Grand Rapids Industrial Stormwater Permitting Program: An Introduction

Brian Bradley
Presentation Outline

• Regulatory background and requirements
• City Industrial Stormwater Program Content
  • Who needs a permit
  • Example regulated activities
  • Permit requirements
  • No exposure situations
  • Priority levels: low/med/high
  • Inspection frequency and process
• What to Expect Next
• Key Contacts & Resources
• Questions
Stormwater Regulation

Clean Water Act

National Pollutant Discharge Elimination System (NPDES)

Municipal Separate Storm Sewer System (MS4)

Phase 1 and Phase 2
Overview of ISW Program

• Facilities can be regulated both by the City and State
• Facilities are required to comply with State industrial stormwater permit requirements, if permitted by the State
• City Permits issued to industrial facilities that have the potential to impact stormwater quality
• Facilities classified into 1 of 3 priority levels which will determine requirements and frequency of inspections
• Facilities inspected every 1 to 5 years with permit renewal based on priority level
Requirements of the City’s ISW Program

All permittees shall:

• Source identification requirements
• Prohibition of unauthorized non-storm water discharges
• Nonstructural preventative measures and source controls
• Structural storm water pollution control requirements, as needed
• Report releases of polluting materials to the City Stormwater Drainage System (CSDS)
• Notify the City of any anticipated actions or activities or changes to facility
• Allow for site inspections
• Pay associated fees
• Comply with regulations of any permits issued by the City and State

Facility with ISW Permit/NPDES permit shall:

• Certified Operator requirements
• Prepare and implement a SWPPP
What if my facility has no exposure to stormwater?

- Complete the initial survey provided by the City
  - Provide No Exposure Certification (NEC) from the State, if applicable
- City will review facility information and determine program applicability
  - NEC facilities will be included in the City’s ISW Program
- Maintain a condition of no exposure
- NEC facilities likely classified as low priority in the City ISW Program

State’s No Exposure Certification (NEC) Criteria:
Compliance with a State Industrial Stormwater Permit = Compliance with the City’s Industrial Stormwater Program
Program Process Overview

• An initial list of 121 facilities that may be included in the program.
• Next steps:
  
  **Industrial Stormwater Survey**
  • City issues
  • Facility completes

  **Site Visits**
  • To determine program eligibility
  • Help identify Priority Level

  **Program Eligibility Determined**
  • Based on survey responses and site visits
  • Some facilities will not be subject to the Program

  **Permit Issued**
  • Priority level assigned
  • Inspection frequency noted
Who needs a City ISW Permit?

Facilities that meet one of the following criteria:

- Have a State-issued Industrial Stormwater Permit or No Exposure Certification (NEC)
- Have one of the following primary SIC codes:
  - Manufacturing (SIC 20— through 39—)
  - Public Warehousing (SIC 422-)
  - Transportation (SIC 40— through 45—)
  - Mining (SIC 10— through 14—)
- Have an Aboveground Storage Tanks (AST)
- Are a RCRA Generator
- Have materials and/or activities exposed to stormwater
Example Regulated Activities/Conditions

When exposed to the elements:

• Storage, loading and unloading, transportation or conveyance of raw, intermediate, final, or waste products
• Material handling equipment (bins, boxes, pallets, racking, etc.)
• Industrial machinery, raw materials, intermediate products, byproducts, final products, and waste products
• Equipment and/or vehicle maintenance and washing
Program Process

INDUSTRIAL STORMWATER SURVEY RECEIVED

Program Eligibility Determination

- Does the facility have an eligible SIC/NAICS code, ASTs or classified as a RCRA generator?
- Did the facility indicate outdoor activities that have the potential to impact stormwater?
- Does the facility have an active NPDES Permit?

Determine Priority Level

- Does a desktop aerial review indicate evidence of outdoor activities?
- Does the facility have an active No Exposure Certification (NEC) from EGLE?
- Perform initial site visit to confirm conditions. No exposure conditions confirmed?

Determine Priority Level

- Perform initial site visit to determine if outdoor activities exist and to decide inspection priority.
- Does the facility rely on good housekeeping or temporary controls for pollution prevention? (tarp covers on aggregate piles, catch basin filtration devices.)
- The facility relies on structural or permanent controls (roofs, secondary containment).

LOW PRIORITY FACILITY
5-Year Inspection Frequency

MEDIUM PRIORITY FACILITY
2-Year Inspection Frequency

HIGH PRIORITY FACILITY
Annual Inspection Frequency

Notify the facility of the inspection findings including priority level and inspection frequency.
Vehicle/Equipment
- Stored inside if possible. If not possible, store away from storm drains
- Floor drains should be connected to sanitary sewer
- Maintenance should occur inside
- Avoid hosing down maintenance areas
- Use drip pans during maintenance
- Proper fluid disposal
- Spill Kits available in area

Outdoor Material Storage
- Covered if possible
- Away from storm drains
- Watch for trackout
- Sweep paved areas regularly

Dumpsters
- Store away from storm drains
- Store on impervious surface
- Condition of container
## Structural Controls

<table>
<thead>
<tr>
<th>Coverings</th>
<th>Safeguarding</th>
<th>Secondary Containment</th>
</tr>
</thead>
</table>
| • Partial or full enclosure of an area to prevent rain and snow from coming into contact with pollutants  
  • Appropriate for outdoor storage of material | • Safety posts, barriers, or fences around high-risk areas  
  • Help eliminate accidental spills due to human error | • Recommended to be able to store 100% of total volume plus additional for storm water  
  • Additional volume of a 25-yr, 24-hr storm rainfall  
  • Must be impervious  
  • Provide way to safely drain collected stormwater |
### City ISW Program: Facility Priority Levels

<table>
<thead>
<tr>
<th>High Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Facilities with outdoor activities/material storage that rely on nonstructural controls to manage stormwater pollution.</td>
</tr>
<tr>
<td>• Will generally hold a state issued NPDES Industrial Stormwater Permit.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Medium Priority</th>
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<tbody>
<tr>
<td>• Facilities with outdoor activities/material storage that rely on structural controls to manage stormwater pollution.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Low Priority</th>
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<tbody>
<tr>
<td>• Facilities that don’t currently have outdoor activities/material storage that is impacting stormwater, but they could have as part of their operations.</td>
</tr>
<tr>
<td>• May hold a No Exposure Certification (NEC) with the State.</td>
</tr>
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</table>
City ISW Program: Inspection, Renewal & Fee Schedule

<table>
<thead>
<tr>
<th>Priority</th>
<th>Permit Renewal</th>
<th>Inspection</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Priority</td>
<td>every year</td>
<td>Upon Permit Renewal</td>
<td>$1,800</td>
</tr>
<tr>
<td>Medium Priority</td>
<td>every 2-years</td>
<td>Upon Permit Renewal</td>
<td>$1,600</td>
</tr>
<tr>
<td>Low Priority</td>
<td>every 5-years</td>
<td>Upon Permit Renewal</td>
<td>$1,200</td>
</tr>
</tbody>
</table>

Re-Inspections
- Inspection: As Needed
- Fee: $600 per inspection

Your facility may be inspected more frequently if you have a reportable spill, complaints and/or violations.
City ISW Program:
Permit Inspection Process

- Initial inspection to determine the facility priority & eligibility
- Inspection upon renewal to review any changes and to confirm priority

Exterior Walk Through

- Verify information from survey
- Determine the presence of any industrial materials and/or activities exposed to stormwater.
- Verify if the facility has controls in place for the prevention of pollution.
- Verify the availability of a SWPPP, if applicable.

Advise of Results

- Advise the facility of the inspection results
  - Subject to the City’s ISW Program?
  - Anticipated facility priority?
  - Subject to State Industrial Stormwater Program?
City ISW Program: Re-Inspection Process

Exterior Walk Through

- Review cause of Re-Inspection
  - Permit violation
  - Reportable Spill or
  - Received Complaint.
- Review clean-up measures.
- Review corrective actions for future prevention.
- Verify update to SWPPP, if applicable.

Advising of Results

- Advise the facility of the inspection results
  - Additional work required?
  - Additional inspection required?
  - Special Action Closed?
- Advise on Assessed Fee.
## What to expect next?

<table>
<thead>
<tr>
<th>Stage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Industrial Stormwater Survey</strong></td>
<td>• City distributes&lt;br&gt;• Facility completes within 14 days</td>
</tr>
<tr>
<td><strong>Permit Inspection</strong></td>
<td>• Contact to schedule Site Visit within 90 days of receipt of survey</td>
</tr>
<tr>
<td><strong>Program Eligibility Determined</strong></td>
<td>• Based on survey responses and site visits&lt;br&gt;• Some facilities will not be subject to the ISW Program</td>
</tr>
<tr>
<td><strong>Permit Issued</strong></td>
<td>• Priority level identified&lt;br&gt;• Renewal frequency noted</td>
</tr>
<tr>
<td><strong>Permit Fees</strong></td>
<td>• Must be paid for permit issuance</td>
</tr>
</tbody>
</table>
Permit Renewal

- Notification of Permit Expiration 90 days prior to expiration
- Survey to submitted no later than 60 days prior to permit expiration
- A Permit Inspection will be completed with each renewal
- Permit Fees due at issuance of renewed permit
City of Grand Rapids Program Contacts
• Phone: 616-456-3000 / 311    Email: industrialsw@grcity.us
• Industrial Stormwater Program webpage
  • www.grandrapidsmi.gov/ISW

State of Michigan Information
• EGLE Industrial Stormwater Program
  • EGLE - Industrial Storm Water Program (michigan.gov)