



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

Grand Rapids Industrial Stormwater Permitting Program: An Introduction

Brian Bradley



Presentation Outline



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

- 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
- Permit Fees
- What to Expect Next
- Key Contacts & Resources
- Questions



Stormwater Regulation



CITY OF
GRAND
RAPIDS

Environmental
Services
Department



Clean Water Act



Overview of ISW Program



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

- 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



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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?



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

- 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:

https://www.michigan.gov/documents/deq/wrd-isw-nec-compliance-assistance_577118_7.pdf



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

**Compliance with a State Industrial Stormwater Permit =
Compliance with the City's Industrial Stormwater
Program**

Program Process Overview



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

- 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

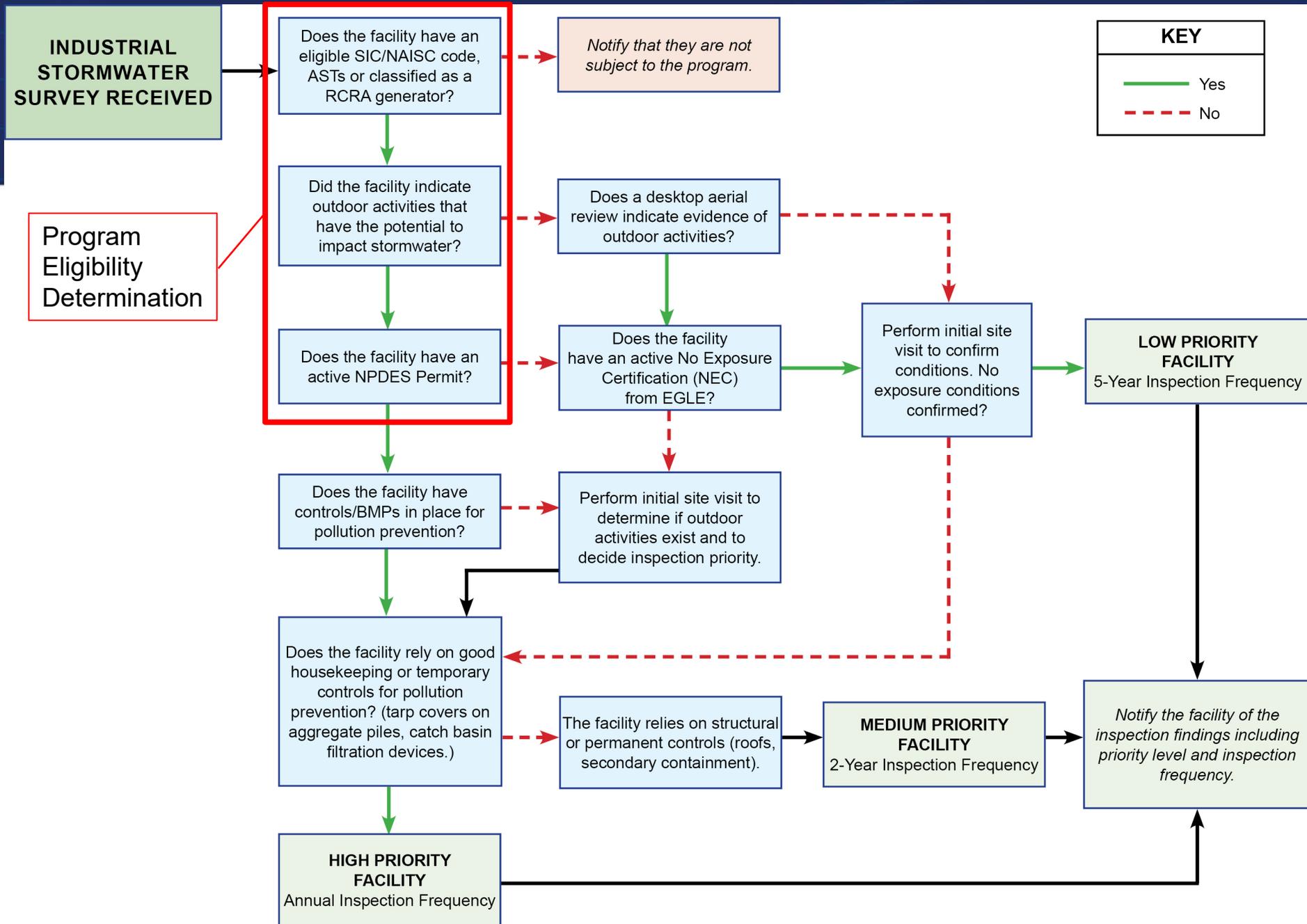
Program Eligibility Determined

- Based on survey responses and site visits
- Some facilities will not be subject to the Program

Permit Issued

- Priority level assigned
- Inspection frequency noted

Program Process



Who needs a City ISW Permit?



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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 materials and/or activities exposed to stormwater
- Have an Aboveground Storage Tanks (AST)
- Are a RCRA Generator

Example Regulated Activities/ Conditions



CITY OF
GRAND
RAPIDS

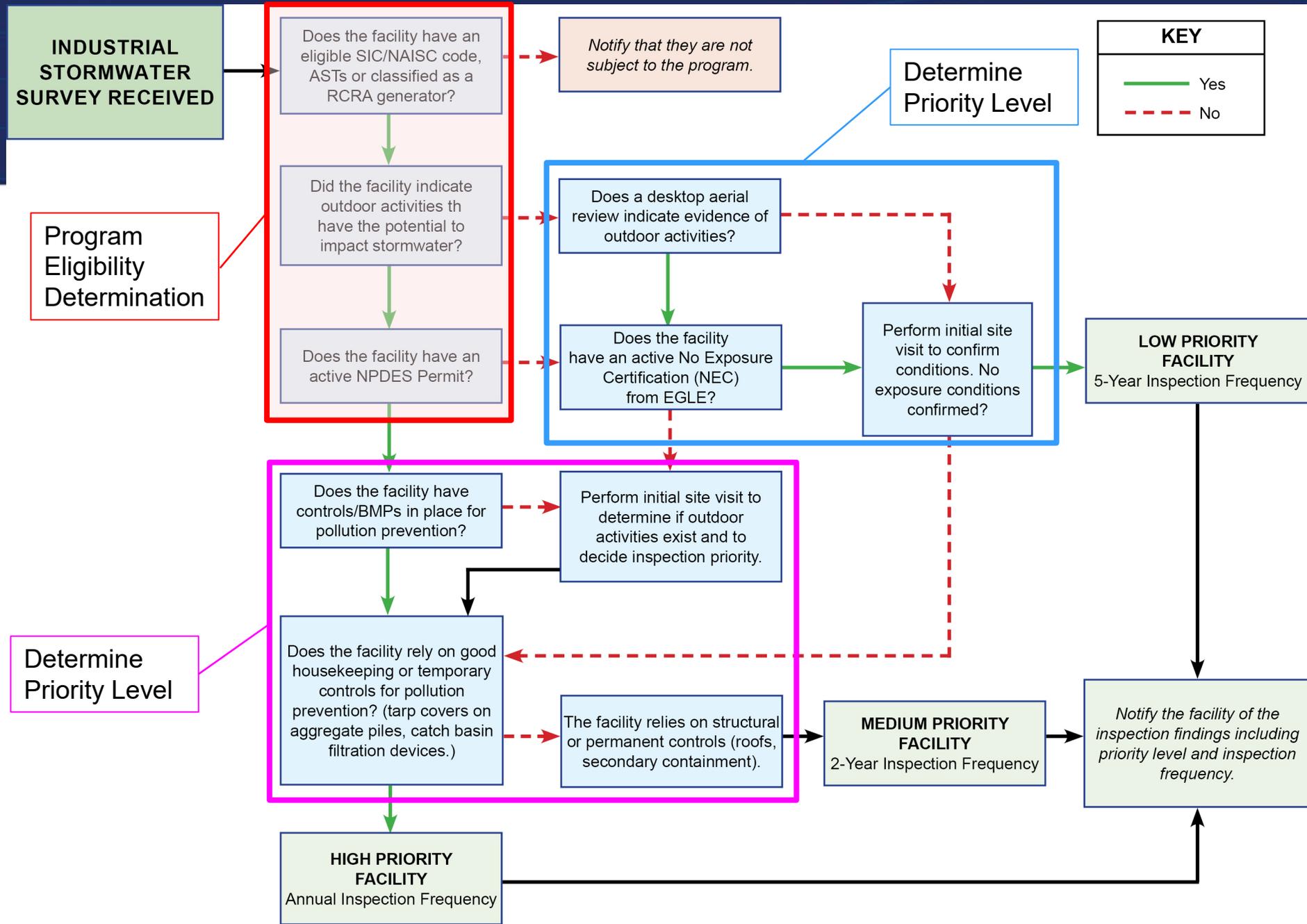
Environmental
Services
Department

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



Good Housekeeping



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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

Coverings

- Partial or full enclosure of an area to prevent rain and snow from coming into contact with pollutants
- Appropriate for outdoor storage of material

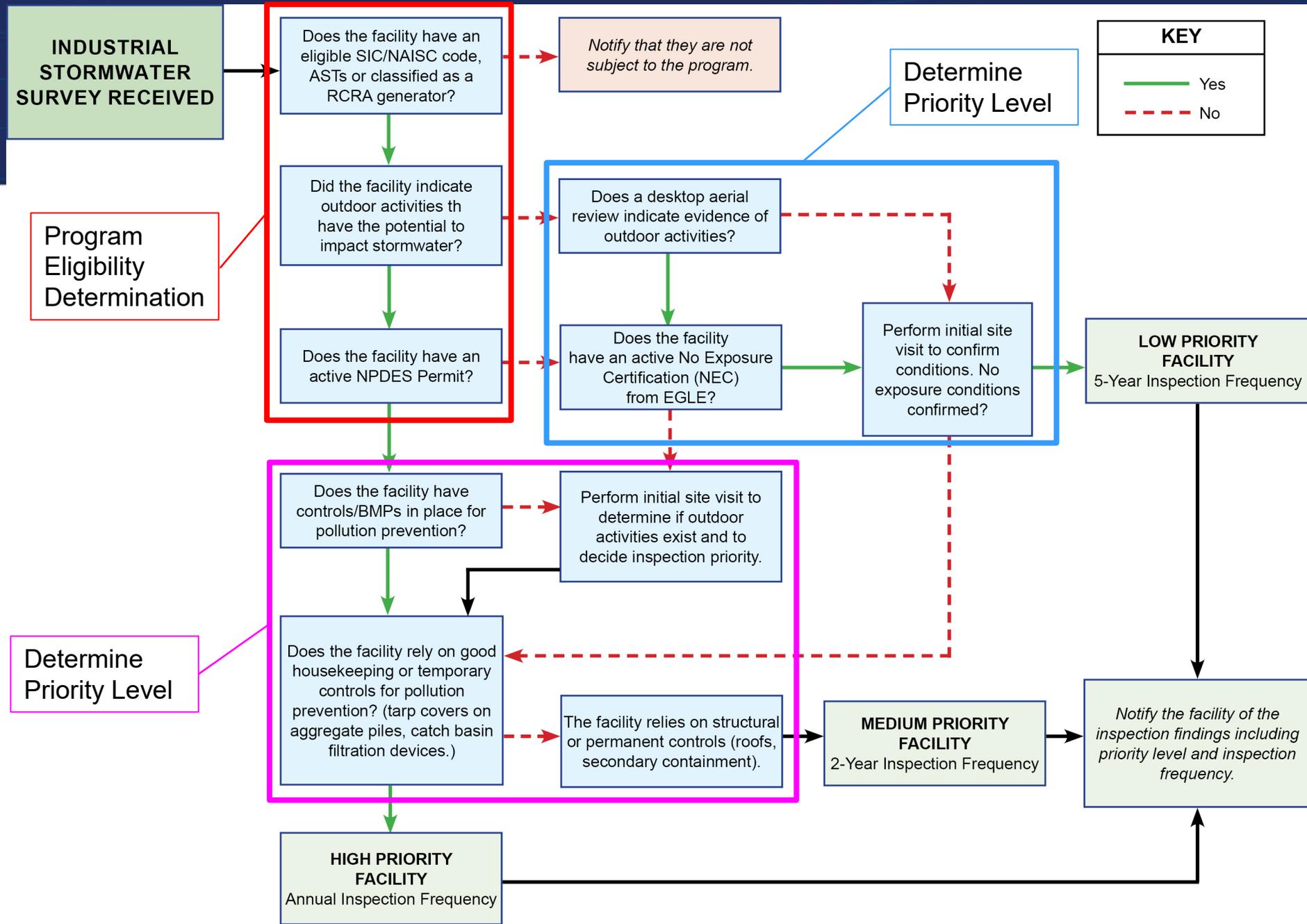
Safeguarding

- Safety posts, barriers, or fences around high-risk areas
- Help eliminate accidental spills due to human error

Secondary Containment

- 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

Program Process



City ISW Program: Facility Priority Levels



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

High Priority

- Facilities with outdoor activities/material storage that rely on nonstructural controls to manage stormwater pollution.
- Will generally hold a state issued NPDES Industrial Stormwater Permit.

Medium Priority

- Facilities with outdoor activities/material storage that rely on structural controls to manage stormwater pollution.

Low Priority

- Facilities that don't currently have outdoor activities/material storage that is impacting stormwater, but they could have as part of their operations.
- May hold a No Exposure Certification (NEC) with the State.

City ISW Program: Inspection, Renewal & Fee Schedule



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

High Priority

- Permit Renewal: every year
- Inspection: Upon Permit Renewal
- Fee: \$1,800

Medium Priority

- Permit Renewal: every 2-years
- Inspection: Upon Permit Renewal
- Fee: \$1,600

Low Priority

- Permit Renewal: every 5-years
- Inspection: Upon Permit Renewal
- Fee: \$1,200

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



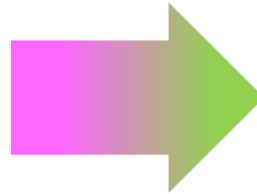
CITY OF
GRAND
RAPIDS

Environmental
Services
Department

- Initial inspection to determine the facility priority
- 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

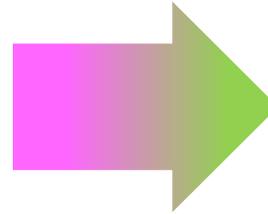


CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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.



Advise 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?



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

Industrial Stormwater Survey

- City distributes
- Facility completes within 14 days

Permit Inspection

- Contact to schedule Site Visit within 90 days of receipt of survey

Program Eligibility Determined

- Based on survey responses and site visits
- Some facilities will not be subject to the ISW Program

Permit Issued

- Priority level identified
- Renewal frequency noted

Permit Fees

- Must be paid for permit issuance

Permit Renewal



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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

Key Contacts & Resources Questions?



CITY OF
GRAND
RAPIDS

Environmental
Services
Department

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 \(michigan.gov\)](http://EGLE - Industrial Storm Water Program (michigan.gov))

