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Grand Rapids Industrial Stormwater Program: Introduction

Brian Bradley



Presentation Outline



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- 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



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Overview of ISW Program



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- 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



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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?



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- 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



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

Program Process Overview



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- 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

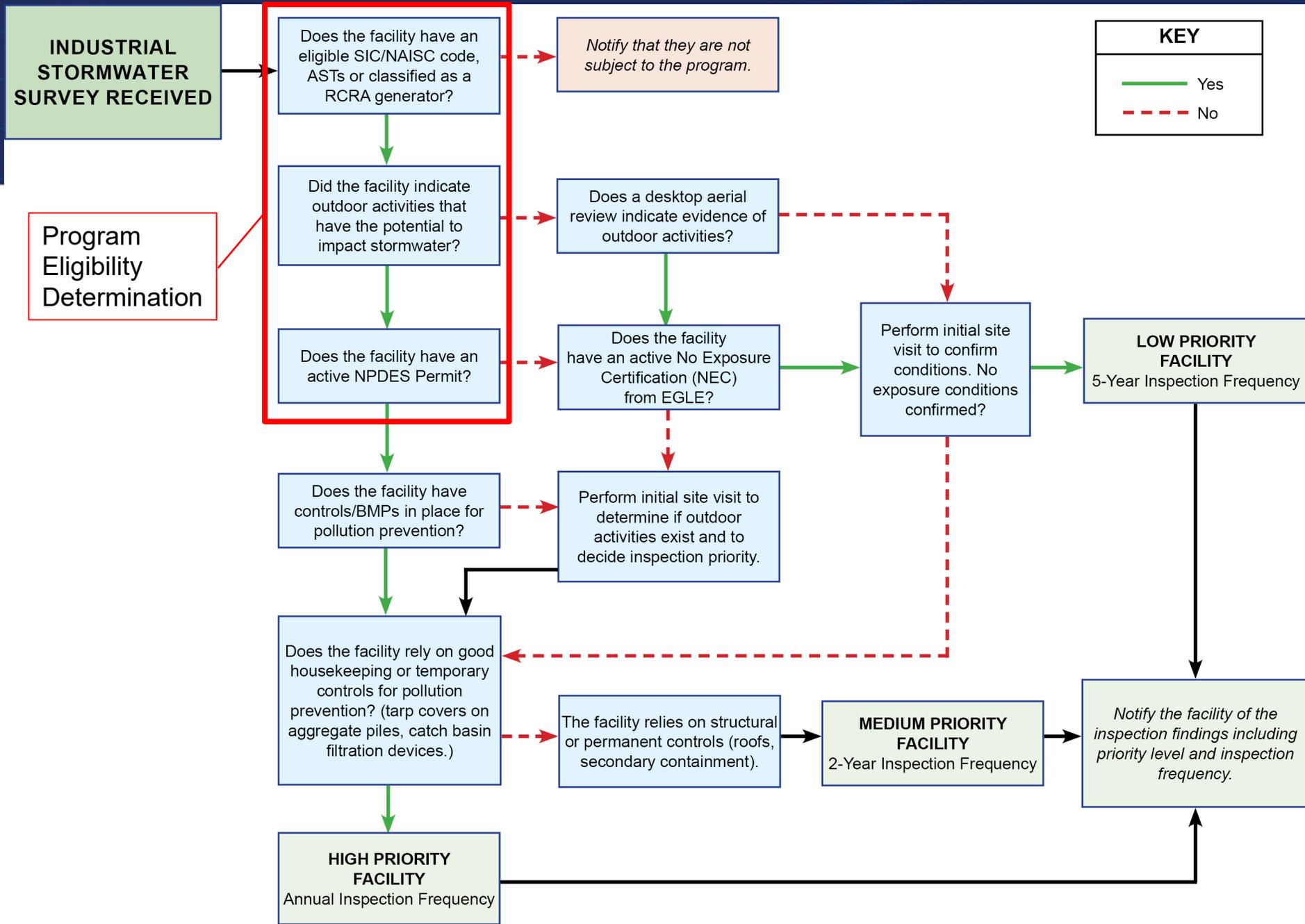
Program Eligibility Determined

- 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?



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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



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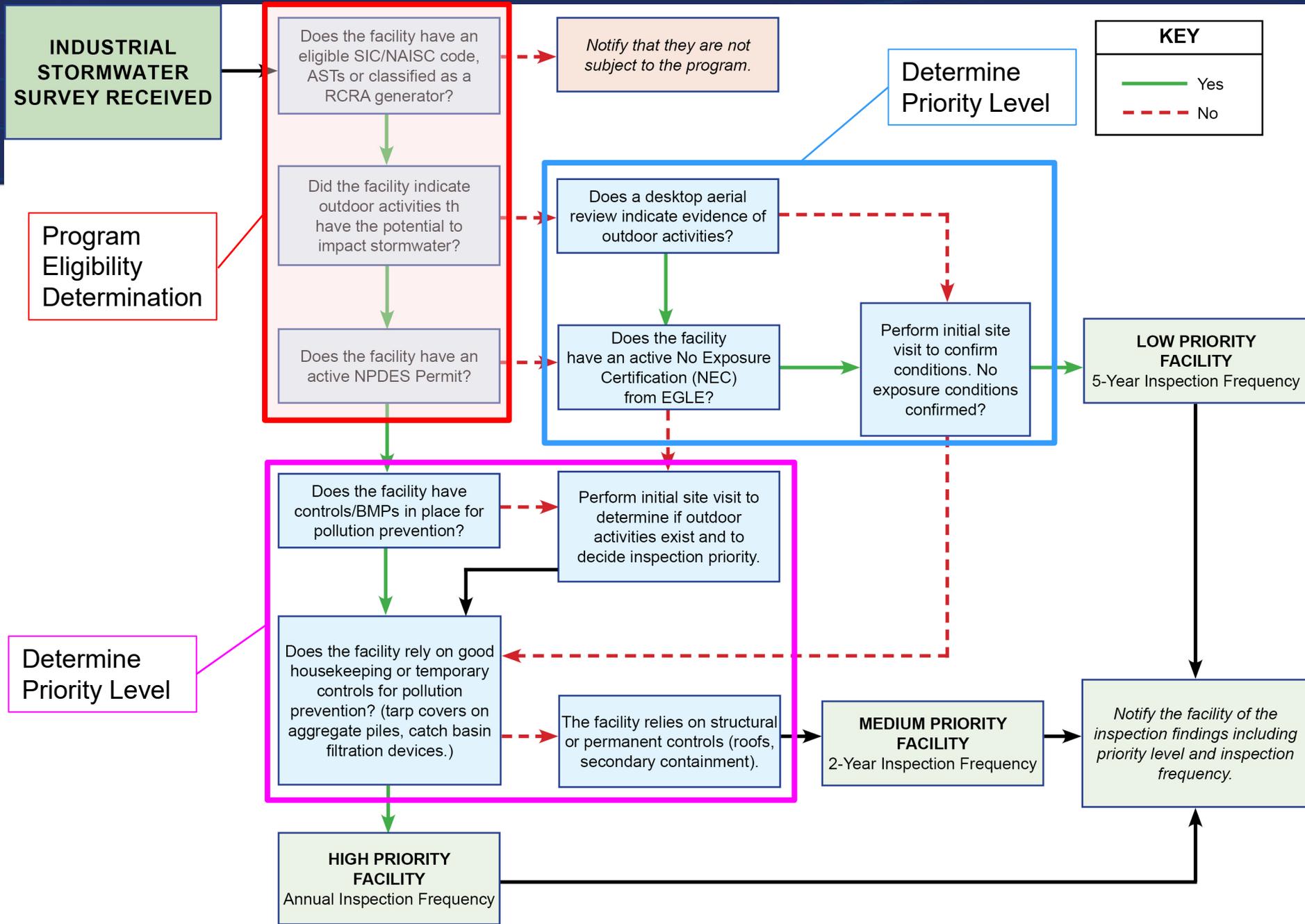
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When exposed to the elements:

- 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



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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

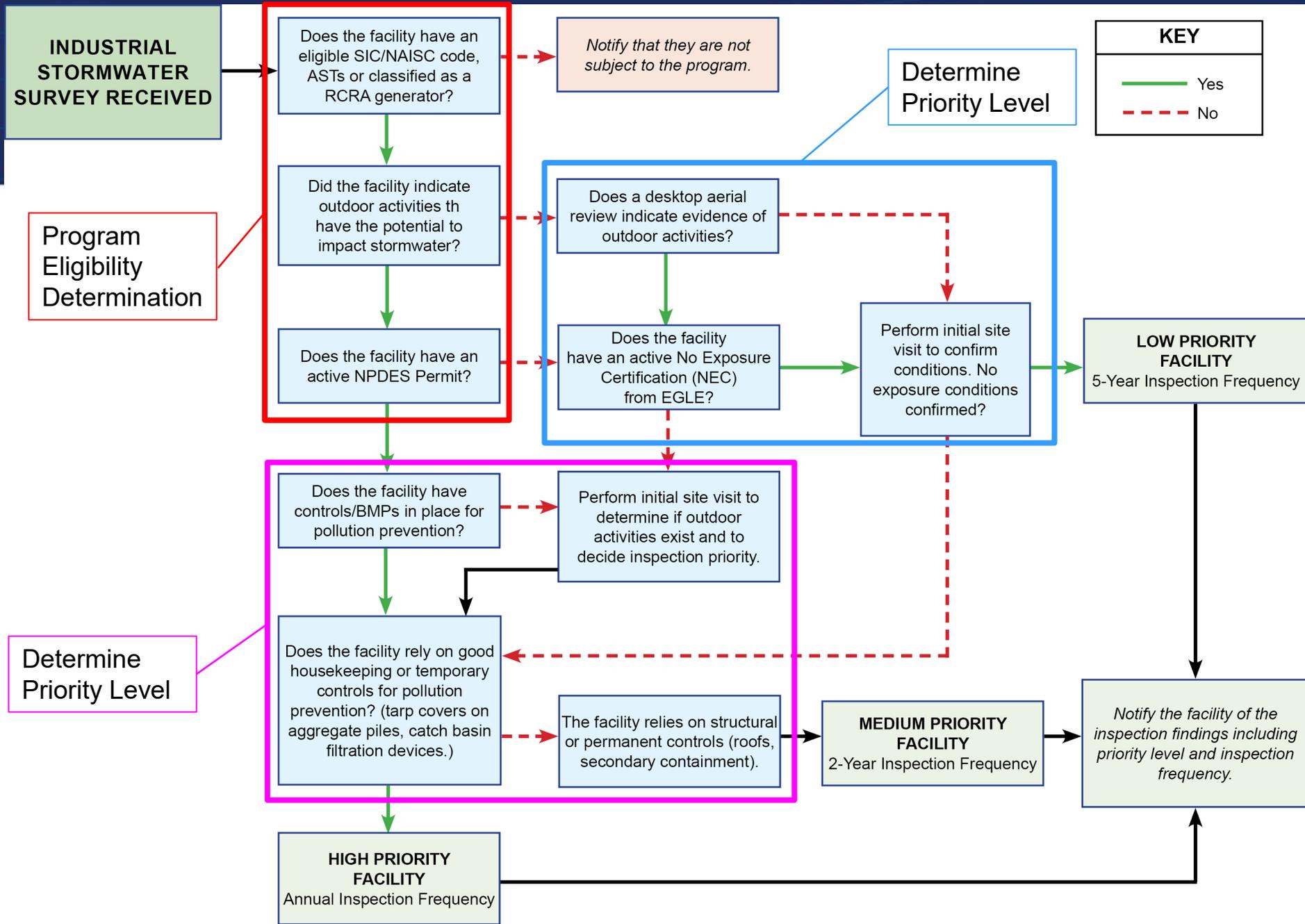
Safeguarding

- 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



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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



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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



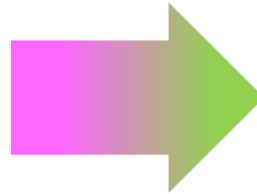
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- Initial inspection to determine the facility priority & eligibility
- Inspection upon renewal to review any changes and to confirm priority

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

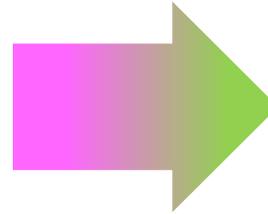


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Exterior Walk Through

- 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?



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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 Fees

- Invoice for Sent
- Must be paid for permit issuance

Permit Issued

- Priority level identified
- Renewal frequency noted

Permit Renewal



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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?



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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
 - <https://www.michigan.gov/egle/about/organization/Water-Resources/industrial-storm-water>

