1.0 GENERAL FACILITY INFORMATION

Name of Facility: Sun Steel Treating Inc

Facility Address: 550 N Mill St, South Lyon, MI 48178

Standard Industrial Classification (SIC) Code: 3398 (332811)

Owner or Authorized Representative:

Facility Contact

Name:

Title:

Telephone: 877-471-0840 ext

Mailing Address: 550 N Mill St, South Lyon, MI 48178

Certified Storm Water Operator

Name & Certification Number: Described Palmane

Permit Information

Certificate of Coverage Number: MIS410178

Effective Date of Coverage:

Receiving Waters: Yerkes Drain to Huron River

Brief Industrial Activity Description

Sun Steel Treating, Inc. is a commercial steel heat treat facility servicing the automotive and tool & die industries. We have a 36,000 sq ft building for salt bath and ion nitriding processes, as well as a 6,600 sq ft building for vacuum processing. We operate on a 24 hour, 365 day work schedule.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for developing, implementing, maintaining, and revising this SWPPP. The members of the team and their primary responsibilities (i.e. implementing, maintaining, record keeping, submitting reports, conducting inspections, employee training, conducting the annual compliance evaluation, testing for non-storm water discharges, signing the required certifications) are as follows:

RESPONSIBILITY
Implementation, documentation, responsible for all reporting requirements
Inspections, maintenance of equipment and
facilities

3.0 SITE MAP

Preparing a site map or sketch is the first step in assessing the facility. (See the DEQ Industrial Certified Operator Training Manual for additional information)

The facility's site map includes all applicable items listed in the permit, which include:

SEE FIGURE 1 FOR FACILITY SITE MAP

- 1) Buildings and other permanent structures
- 2) Storage or disposal areas for significant materials
- 3) Secondary containment structures and descriptions of what they contain in the primary containment structures
- 4) Storm water discharge outfalls (numbered or other wise labeled for reference)
- 5) Location of storm water and non-storm water inlets contributing to each outfall (catch basins, roof drains, conduits, drain tiles, detention pond riser pipes, sump pumps, etc.) (numbered or other wise labeled for reference
- 6) Location of NPDES permitted discharges other than storm water
- 7) Outlines of the drainage areas contributing to each outfall
- 8) Structural runoff controls or storm water treatment facilities
- 9) Areas of vegetation (with brief description such as lawn, old field, marsh, wooded, etc.)
- 10) Areas of exposed and/or erodible soils
- 11) Impervious surfaces (roofs, asphalt, concrete, etc.)
- 12) Name and location of receiving waters
- 13) Areas of known or suspected impacts on surface waters as designated under Par 201 (Environmental Response) of the Michigan Act.

23.0 ANNUAL SWPPP REVIEW REPORT FORM

Facility Information					
Designated Name: Sun Steel Treating Inc	erage N	No.: MIS	3410178		
Facility Contact Information					
Name: Country Fall to	Telephone No.: 8	877-471	I-0840 e	xt 254	
Email Address:	Certific	cation No	o: I-1178	4	
a house from helbreating.com					
Backup Facility Contact Information	Talankana Na				
Name: None	Telephone No.:				
Email Address:		Certific	cation No	D:	
Certified Operator Information					
Name: Dennis C Palmiter	Telephone No.: 8	377-471	-0840 e	xt 254	
Email Address:	cation No	o: I-1178	4		
dpalmiter@sunsteeltreating.com					
Facility general information is current and	Review Checklist accurate		Yes	No	
2) Site map is current and accurate		Yes	No	Acet Constitution	
3) Significant material inventory is current ar			Yes	No	
4) New exposures, processes and related co- documented appropriately in the SWPPP	ontrols have been		Yes	No	NA
5) Spills have been recorded and reported a	s appropriate		Yes	No	NA
6) Employee SWPPP training was conducted	d and documented		Yes	No	
7) Records of routine preventative maintenal inspections are available in the SWPPP file	ng	Yes	No		
8) Comprehensive site inspections have bee filed in the SWPPP file	Yes	No			
9) Corrective actions noted in the inspection completed		Yes	No		
10) SWPPP has been reviewed and signed I	n	Yes	No	A Ballahar	
Water Operator and the Permittee or designation	ated representative				
Additional Comments (use additional sheets if ne	ocessary).				
Additional Comments (use additional sheets if he	ocosary).				

SUBMIT THIS FORM TO THE DISTRICT OFFICE IDENTIFIED ON YOUR CERTIFICATE OF COVERAGE ON OR BEFORE $\underline{{\bf JANUARY~10}^{\rm TH}}$ OF EACH YEAR

Signature / Date:

I certify that the above information is correct

Name: Dennis C Palmiter

FACILITY NAME: SUN STEEL TREATING INC

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

DEQ SWPPP Template (Revised 9/13/2012)

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	 4.1 Inventory of Exposed Significant Materials 4.2 Description of Industrial Activities & Significant Material Storage Areas 4.3 List of Significant Spills 4.4 Summary of Sampling Data
5.0	Non-Structural Controls
	 5.1 Preventative Maintenance Program 5.2 Comprehensive Site Inspection 5.3 Housekeeping Procedures 5.4 Material Handling & Spill Prevention / Clean-Up Procedures 5.5 Soil Erosion & Sedimentation Control Measures 5.6 Employee Training Program 5.7 TMDL Requirements 5.8 List of Significant Materials Still Present
6.0 7.0 8.0 9.0 10.0 11.0 12.0 13.0 14.0 15.0 16.0 17.0 19.0 20.0 21.0 22.0 23.0 24.0 25.0 26.0	Structural Controls Non-Storm Water Discharges Annual Review Certified Storm Water Operator Update Record Keeping SWPPP Certification Figure 1 – Facility Site Map Table 1 – Significant Material Inventory and Description of Industrial Activity or Significant Material Storage Areas Table 2 – List of Significant Spills Table 3 – Description of Preventative Maintenance / Routine Housekeeping Inspections Table 4 – Material Handling & Spill Prevention / Clean-Up Procedures Table 5 – Spill Kit Inventory Table 6 – Structural Controls used at the Facility Preventative Maintenance Inspection Form Comprehensive Site Inspection Form Housekeeping Inspection Form Employee Training Form Annual SWPPP Review Form DEQ Spill or Release Report Sample Site Map Sample Table 1

Dennis Palmiter

From:

MiWaters Support <EGLE-WRD-MiWaters@michigan.gov>

Sent:

Friday, January 3, 2020 2:03 AM

To:

Dennis Palmiter

Subject:

Schedule Due Soon Reminder - 7 day - Annual SWPPP Review Report

This message is to notify you that the following schedule is due within the next 7 days:

Relates to: Permit MIS410178 v4.0

Site Name: Sun Steel Treating-South Lyon

Schedule: Storm Water - Industrial/Commercial - Annual SWPPP Review Report

Due Date: 01/10/2020

Instructions: Annual SWPPP Review Report

Access MiWaters and submit your schedule using the URL below:

https://miwaters.deq.state.mi.us/miwaters/

Upon logging in, locate and submit the schedule using the following instructions:

- 1. Select **Sun Steel Treating-South Lyon** from the navigation menu.
- 2. Click the 'Apps, Requests and Reports' link for the navigation menu
- 3. Click the "New and Draft Compliance Reports" heading
- 4. Locate the schedule in the list of schedules and click the Begin Submission button
- 5. Fill out and submit the schedule form

A receipt acknowledgement notification will be sent upon submission of your schedule.

This is an automated email sent by the MiWaters System

Dennis Palmiter

From:

MiWaters Support < EGLE-WRD-MiWaters@michigan.gov>

Sent:

Thursday, January 9, 2020 11:01 AM

To:

Dennis Palmiter

Subject:

Compliance Schedule Submission Receipt Notification - HNW-N368-AVBCY, Sun Steel

Treating-South Lyon

This is to notify you that the Michigan Department of Environment, Great Lakes, and Energy (EGLE) has received your submission. Details of your submission are presented below:

Schedule Name: Annual SWPPP Review Report

Submission Reference Number: HNW-N368-AVBCY

Entered by: Dennis Palmiter

System Receipt Date: 01/09/2020 10:45AM

Facility, Site, or Project Name: Sun Steel Treating-South Lyon

Permit Number: MIS410178 v4.0

Additional notifications will be sent when key events are recorded or when submission processing milestones are achieved.

You can access MiWaters using the link below if you need to modify your submission.

https://miwaters.deq.state.mi.us/miwaters/

This is an automated email sent by the MiWaters system

Dennis Palmiter

From:

MiWaters Support < EGLE-WRD-MiWaters@michigan.gov>

Sent:

Thursday, January 9, 2020 10:46 AM

To:

Dennis Palmiter

Subject:

MiWaters Account Password Updated - Dennis Palmiter

Dennis Palmiter,

This notification is to inform you that you've successfully updated your password.

If you did not change your password, your account may have been compromised. In this case, please contact MiWaters support at: EGLE-WRD-MiWaters@michigan.gov.

This is an automated email sent by the MiWaters system.



STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



November 14, 2019

Joseph R. McGuirk 2016 Oakview Drive Canton, Michigan 48178

Your examination for certification as a Storm Water Management Operator has been graded and the results presented to the Board of Examiners. The Board has recommended to the Michigan Department of Environment, Great Lakes, and Energy issuance of a certificate based on a passing score of 70%. Your examination results, as reported to and approved by the Board of Examiners, follow:

A-1i Storm Water Management Industrial Site - 96 %

Congratulations on behalf of the Director of the Michigan Department of Environment, Great Lakes, and Energy.

Your certificate number is **I-17064**. Please retain this certificate on file as your record of certification.

Please note that the certification remains in effect until **July 1, 2025**. Shortly before that date, information regarding renewal will be sent to your most recent home address in our files. A certified operator who changes his/her address must notify the Operator Training and Certification Unit within 30 days of the change. Please contact Alyssa Sarver at sarvera@michigan.gov or 517-284-5486 to report address changes.

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

This is to certify that

Joseph R. McGuirk

is qualified under the rules governing certification to operate any facility listed under the classification

STORM WATER MANAGEMENT - INDUSTRIAL SITE

A-1i

CERTIFICATE NO. I- 17064

EXPIRES JULY 1, 2025

Issued by the Director of the Department of Environment, Great Lakes, and Energy Under Authority of Act 451 P.A. 1994, Part 31 as amended

EQC 3450-1 (Rev 3/24/2011)

23.0 ANNUAL SWPPP REVIEW REPORT FORM

Designated Name: Sun Steel Treating Inc	Cartificate of C	OVOROGO	Na . NAI	0440470	
	Certificate of Co	overage	NO.: IVII	5410178	
Facility Contact Information		ug Tarangan			
Name: Joe McGairk	Telephone No.:	877-47	1-0840	ext 254	
Email Address		Certif	ication N	lo: 1-11/6	- 1
Backup Facility Contact Information	cm			1-17	064
Sackup Facility Contact Information					1
Name: None	Telephone No.:				
Email Address:		Certifi	ication N	0:	
Certified Operator Information					1000
Name: Delimier	Telephone No.:	877-47	1-0840 e	ext 254	
Loe McGW/R	·				
Email Address:		Certifi	cation N	0:	
Jee @sunsteeltreating.com		1-	1706	1	
) Facility general information is current and a	accurate		Yes	No	
 Site map is current and accurate 		Yes	No		
) Significant material inventory is current and	d accurate		Yes	No	
) New exposures, processes and related con	ntrols have been		Yes	No	NA
ocumented appropriately in the SWPPP					
) Spills have been recorded and reported as	appropriate		Yes	No	NA
) Employee SWPPP training was conducted	and documented		Yes	No	
Records of routine preventative maintenan	ce and housekeepi	ng	Yes	No	
aspections are available in the SWPPP file					
) Comprehensive site inspections have been led in the SWPPP file		d and	Yes	No	
Corrective actions noted in the inspection re	eports have been		Yes	No	
ompieted		*			
O) SWPPP has been reviewed and signed by	y the Certified Storn	n	Yes	No	
later Operator and the Permittee or designat	ed representative				
dditional Comments (use additional sheets if nece					
manuscriation de additional sileets il fiece	essary).				
certify that the above information is corre		Tografi magangganika			
ame:					
Arrayana ar	Signature / Date:				

SUBMIT THIS FORM TO THE DISTRICT OFFICE IDENTIFIED ON YOUR CERTIFICATE OF COVERAGE ON OR BEFORE $\underline{\textbf{JANUARY 10}^{\text{TH}}}$ OF EACH YEAR

1.0 GENERAL FACILITY INFORMATION

Name of Facility: Sun Steel Treating Inc

Facility Address: 550 N Mill St, South Lyon, MI 48178

Standard Industrial Classification (SIC) Code: 3398 (332811)

Owner or Authorized Representative:

Facility Contact

Name: Joe McGuirk

Title: 200

Telephone: 877-471-0840 ext 210

Mailing Address: 550 N Mill St, South Lyon, MI 48178

Certified Storm Water Operator

Name & Certification Number Joseph 12 McGwrk No. 1-17064

Permit Information

Certificate of Coverage Number: MIS410178

Effective Date of Coverage: 1-9-2020

Receiving Waters: Yerkes Drain to Huron River

Brief Industrial Activity Description

Sun Steel Treating, Inc. is a commercial steel heat treat facility servicing the automotive and tool & die industries. We have a 36,000 sq ft building for salt bath and ion nitriding processes, as well as a 6,600 sq ft building for vacuum processing. We operate on a 24 hour, 365 day work schedule.

2.0 STORM WATER POLLUTION PREVENTION TEAM

The storm water pollution prevention team is responsible for developing, implementing, maintaining, and revising this SWPPP. The members of the team and their primary responsibilities (i.e. implementing, maintaining, record keeping, submitting reports, conducting inspections, employee training, conducting the annual compliance evaluation, testing for non-storm water discharges, signing the required certifications) are as follows:

Add additional spaces as necessary	
NAME & TITLE	RESPONSIBILITY
JOE MEGGIRK	Implementation, documentation, responsible for all reporting requirements
Michael Gray Maintenance Manager	Inspections, maintenance of equipment and facilities

3.0 SITE MAP

Preparing a site map or sketch is the first step in assessing the facility. (See the DEQ Industrial Certified Operator Training Manual for additional information)

The facility's site map includes all applicable items listed in the permit, which include:

SEE FIGURE 1 FOR FACILITY SITE MAP

- 1) Buildings and other permanent structures
- 2) Storage or disposal areas for significant materials
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- 10) Areas of exposed and/or erodible soils
- 11) Impervious surfaces (roofs, asphalt, concrete, etc.)
- 12) Name and location of receiving waters
- 13) Areas of known or suspected impacts on surface waters as designated under Par 201 (Environmental Response) of the Michigan Act.

4.0 SIGNIFICANT MATERIALS

Definition: Significant materials are any material which could degrade or impair water quality, including but not limited to:

- √ Raw Materials
- √ Fuels
- ✓ Solvents
- ✓ Detergents
- ✓ Plastic pellets
- ✓ Finished materials (i.e. metallic products)
- √ Hazardous Substances designated under section 101(14) of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), see 40 CFR 372.65
- ✓ Any chemical the facility is required to report pursuant to section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA)
- ✓ Polluting Materials Oil and any material, in solid or liquid form, identified as polluting material under the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code)
- ✓ Hazardous Wastes as defined in Part 111 of the Michigan Act
- √ Fertilizers
- ✓ Pesticides
- ✓ Waste Products (i.e. ashes, slag, sludge, plant waste, animal waste)

During the significant materials identification phase, all sources of potential storm water contamination need to be identified. Both the inside and outside of the facility must be inventoried to determine the materials and practices that may be sources of contamination to storm water runoff. Note the identification phase must address residual contaminants which may be found on items stored outside.

4.1 Inventory of Exposed Significant Materials

The permit requires a general inventory of significant materials that could enter storm water. For each material listed the SWPPP shall include the ways in which each type of material has been or has reasonable potential to become exposed to storm water (e.g. spillage during handling; leaks from pipes, pumps, or vessels; contact with storage piles, contaminated materials or soils; waste handling and disposal; deposits from dust or overspray; etc.). In addition, the SWPPP must identify the inlet(s) spilled significant materials may enter and the outfall(s) through which the spilled significant material may be discharged.

SEE TABLE 1 FOR SIGNIFICANT MATERIAL INVENTORY

4.2 Description of Industrial Activities & Significant Material Storage Areas

The permit requires industrial facilities to evaluate the reasonable potential for contribution of significant materials to storm water runoff from at least the following areas or activities:

- 1) Loading, unloading, and other material handling operations
- 2) Outdoor storage including secondary containment structures
- 3) Outdoor manufacturing or processing activities
- 4) Significant dust or particulate generating processes
- 5) Discharge from vents, stacks, and air emission controls
- 6) On-site waste disposal practices
- 7) Maintenance and cleaning of vehicles, machines, and equipment
- 8) Areas of exposed and/or erodible soils
- 9) Sites of Environmental Contamination listed under Part 201 (Environmental Response) of the Michigan Act
- 10) Areas of significant material residues
- 11) Areas where animals congregate (wild or domestic) and deposit wastes
- 12) Other areas where storm water may contact significant materials

For each applicable item, the permit requires a written description of the specific activity or storage area. Along with the written description of the activities or storage areas, a description of the significant materials associated with those items must be included.

SEE TABLE 1 FOR INDUSTRIAL ACTIVITY AND SIGNIFICANT MATERIAL STORAGE AREA DESCRIPTIONS

4.3 List of Significant Spills

The permit requires a list of significant spills and significant leaks of polluting materials that occurred at areas that are exposed to precipitation or that otherwise discharge to a point source at the facility. The listing shall include spills that occurred over the three years prior to the effective date of a certificate of coverage authorizing discharge under the General Permit. The listing shall include the date, volume, exact location of release, and actions taken to clean up the material and/or prevent exposure to storm water runoff or contamination of surface waters of the state. Any release that occurs after the SWPPP has been developed shall be controlled in accordance with the SWPPP and is cause for the SWPPP to be updated as appropriate within 14 calendar days of obtaining knowledge of the spill or loss. (If there have been no spills of polluting materials, state that in this section.)

SEE TABLE 2 FOR A LISTING OF SIGNIFICANT SPILLS

4.4 Summary of Sampling Data

The permit requires a summary of existing storm water discharge sampling data (if available) describing pollutants in storm water discharges associated with industrial activity at the facility. The summary shall be accompanied by a description of the suspected sources of the pollutants detected. (If there is no storm water discharge sampling data, state that in this section.)

detected. (If there is no eterm water districtly	o dampling data, diato that in
Add additional spaces as necessary	
SUMMARY OF SAMPLING EVENTS:	

NONE TAKEN

5.0 NON-STRUCTURAL CONTROLS

Non-structural controls are practices that are relatively simple, fairly inexpensive, and applicable to a wide variety of industries or activities. Non-structural controls are intended to reduce the amount of pollution getting into the surface waters of the state and are generally implemented to address the problem at the source. They do not require any structural changes to the facility. These are typically everyday types of activities undertaken by employees at the facility. Many facilities may already have nonstructural controls in place for other reasons. The permit requires that the SWPPP shall, at a minimum, include each of the following non-structural controls.

5.1 Preventative Maintenance Program (Routine Inspection Program)

The permit requires a description of a program for routine preventive maintenance which includes inspection and maintenance of storm water management and control devices (e.g. cleaning of oil/water separators and catch basins) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. A log of the inspection and corrective actions shall be maintained on file and shall be retained for three years. The Preventative Maintenance Inspection Form is in Section 19.0. (See the DEQ Industrial Certified Operator Training Manual for additional information. If this requirement is addressed in other facility procedures, reference those procedures here.)

SEE TABLE 3 FOR PREVENTATIVE MAINTENANCE / ROUTINE HOUSEKEEPING INSPECTION PROGRAM

5.2 Comprehensive Site Inspection

The permit requires a schedule for comprehensive site inspection to include but not be limited to, the areas and equipment identified in the preventive maintenance program and good housekeeping procedures. The inspection shall also include a review of the routine preventive maintenance reports, good housekeeping inspections reports, and any other paperwork associated with the SWPPP. The comprehensive site inspection shall be conducted by the Certified Storm Water Operator quarterly. The permittee may request Department approval of an alternate schedule for comprehensive site inspections. A report of the comprehensive site inspection results shall be prepared and retained for three years. The report shall identify any incidents of non-compliance with the SWPPP or this permit. If there are no reportable incidents of non-compliance, the report shall contain a certification that the facility is in compliance with this permit. The Comprehensive Site Inspection Form is in Section 20.0.

COMPREHESIVE SITE INSPECTION SCHEDULE:

SPRING AND FALL (MARCH - MAY, SEPTEMBER - NOVEMBER)

COMPREHENSIVE SITE INSPECTION DESCRIPTION:

President and Maintenance Manager will perform a site inspection of all process and containment locations checking for any leaks and/or discharges. A log is maintained documenting any findings.

5.3 Housekeeping Procedures

The permit requires that the SWPPP include a description of good housekeeping procedures to maintain a clean, orderly facility. Housekeeping procedures are intended to reduce the potential for significant materials to come in contact with storm water. The Housekeeping Inspection Form is in Section 21.0. (See the DEQ Industrial Certified Operator Training Manual for additional information.)

SEE TABLE 3 FOR PREVENTATIVE MAINTENANCE / ROUTINE HOUSEKEEPING INSPECTION PROGRAM

HOUSEKEEPING PROCEDURE DESCRIPTION:

Floors are swept daily, with sweepings deposited in proper trash or hazardous waste receptacles. Floors are washed weekly with the water being treated in the water treatment tank. In the event of a leak or spill, the use of pig mats or absorbents is required.

5.4 Material Handling & Spill Prevention / Clean-Up Procedures

The permit requires a description of material handling procedures and storage requirements for significant materials. Equipment and procedures for cleaning up spills shall be identified in the SWPPP and made available to the appropriate personnel. The procedures shall identify measures to prevent spilled materials or material residues on the outside of the containers from being discharged into storm water.

The SWPPP may include, by reference, requirements of either a Pollution Incident Prevention Plan (PIPP) prepared in accordance with the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code); a Hazardous Waste Contingency Plan (HWCP) prepared in accordance with 40 CFR 264 and 265 Subpart D, as required by Part 111 of the Michigan Act; or a Spill Prevention Control and Countermeasure (SPCC) plan prepared in accordance with 40 CFR 112.

THE FOLLOWING PLANS ARE ON FILE AT THE FACILITY:

Spills and leaks together are the largest industrial source of storm water pollution. Thus, this SWPPP specifies material handling procedures and storage requirements for significant materials. Equipment and procedures necessary for cleaning up spills and preventing the spilled materials from being discharged have also been identified. All employees have been made aware of the proper procedures. (See the DEQ Industrial Certified Operator Training Manual for additional information.)

SEE TABLE 4 FOR MATERIAL HANDLING & SPILL PREVENTION / CLEAN-UP PROCEDURES

SEE TABLE 5 FOR SPILL KIT INVENTORY

5.5 Soil Erosion & Sedimentation Control Measures

The permit requires the identification of areas which, due to topography, activities, or other factors, have a high potential for significant soil erosion. Areas commonly prone to soil erosion are: gravel lots, bare earth or gravel at material handling areas around storm water inlets, areas with concentrated storm water runoff into streams or ditches, and access roads over open streams or ditches. Control measures must be implemented in areas prone to soil erosion and sedimentation. (More information on soil erosion and sedimentation control may be obtained from the DEQ, Water Bureau District Office.)

AREA OF CONCERN:	CONTROL MEASURE:
N/A	
1477	

5.6 Employee Training Program

The permit requires a description of employee training programs have been implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP. Recent modifications to the General Permits have included a requirement for annual employee training. The SWPPP shall identify periodic dates for such training. DEQ recommends that employees are trained at the time of hire, then annually. An employee training video is available at the DEQ website: http://www.michigan.gov/deq/0,1607,7-135-3308-3333-4168---,00.html

Employee training will be a major component in ensuring the success of the facility's SWPPP. The more knowledgeable all employees are about the facility's SWPPP and what is expected of them, the greater the chance that the plan will be effective. The following is a description of the employee training programs to be implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP (i.e. good housekeeping practices, spill prevention and response procedures, waste minimization practices, informing customers of facility policies, etc.). The Employee Training Form is in Section 22.0.

EMPLOYEE TRAINING DESCRIPTION & FREQUENC	CY	IFN	C	F	FR	ጼ	N	0	T	IF	CF	S	DF	G	N	VI	AII	TR.	E	Έ	Y	C	P	M	E
--	----	-----	---	---	----	---	---	---	---	----	----	---	----	---	---	----	-----	-----	---	---	---	---	---	---	---

New hire orientation and annual training in conjunction with hazwopper training.

All employees participate and sign an attendance roster.

5.7 TMDL Requirements

The permit requires that if there is a Total Maximum Daily Load (TMDL) established by the Department for the receiving water, which restricts the discharge of any of the identified significant materials or constituents of those materials, then the SWPPP shall identify the level of control for those materials necessary to comply with the TMDL.

The TMDL means the amount of pollutant load a water body, such as a lake or stream, can assimilate and still meet water quality standards. If a receiving water body does not meet the water quality standards for a specific pollutant, the DEQ will establish the appropriate daily maximum load for that pollutant to allow the water body to again meet water quality standards. If a permitted facility is expected to discharge that specific pollutant in its storm water to that water body, the General Permit requires the facility to list actions it will take to meet that TMDL requirement. For example, if the TMDL calls for storm water dischargers to reduce their phosphorus inputs by 50%, the permittee would need to identify phosphorus sources at their facility and estimate their current annual load. The permittee must list actions to reduce storm water phosphorus discharges from their facility by 50%.

See the DEQ website for additional TMDL information at: http://www.michigan.gov/deq/0,1607,7-135-3313 3686 3728-12464--,00.html

IS THERE A TMDL REQUIREMENT FOR THE RECEIVING WATER?	
NO	

Below is the identification of actions to limit the discharge of significant materials in order to comply with TMDL requirements:

TMDL POLLUTANT:	BEST MANAGEMENT PRACTICES IMPLEMENTED ONSITE:
N/A	

5.8 List of Significant Materials Still Present

The permit requires the identification of significant materials expected to be present in storm water discharges following implementation of non-structural preventative measures and source controls. Non-structural controls are used to reduce pollutants at the source before they can get into the storm water runoff. In some cases, these types of controls will not be enough. A list of significant materials expected to be present in storm water discharges after implementation of nonstructural controls must be included in the SWPPP. The materials listed below will be addressed through the use of structural controls. (If there will be no significant materials present after the implementation of non-structural controls, state that in this section.)

SIGNIFICANT MATERIAL & LOCATION:	PLANNED CONTROL MEASURE:	IMPACTED OUTFALL:
Barium salts Throughout the plant	Water is treated for barium before release to city water treatment plant	Water treatment tank in basement

6.0 STRUCTURAL CONTROLS

The permit requires that where implementation of non-structural controls does not control storm water discharges in accordance with water quality standards, the SWPPP shall provide a description of the location, function, and design criteria of structural controls for prevention and treatment.

Structural controls may be necessary:

- 1) To prevent uncontaminated storm water from contacting or being contacted by significant materials; or
- 2) If preventive measures are not feasible or are inadequate to keep significant materials at the site from contaminating storm water. Structural controls shall be used to treat, divert, isolate, recycle, reuse, or otherwise manage storm water in a manner that reduces the level of significant materials in the storm water and provides compliance with the Water Quality Standards

Examples of structural controls:

- √ Signs and Labels
- √ Safety Posts
- √ Fences
- √ Security Systems
- √ Temporary and Permanent Coverings

- ✓ Storm Water Conveyances
- ✓ Diversion Dikes
- ✓ Grading
- ✓ Paving
- ✓ Curbing
- ✓ Drip Pans
- ✓ Secondary Containment
- ✓ Catch Basin Inserts
- ✓ Detention and Retention Ponds
- √ Vegetative Filters
- √ Sand Filters
- ✓ Oil/Water Separators

These types of controls are physical features that control and prevent storm water pollution. They can range from preventive measures to collection structures to treatment systems. Structural controls will typically require construction of a physical feature or barrier. Below is a description of the structural controls used at the facility. (See the DEQ Industrial Storm Water Operator Training Manual for additional details on structural controls. If no structural control measures are needed at the facility, state that in this section.)

SEE TABLE 6 FOR A LIST OF STRUCTURAL CONTROLS USED AT THE FACILITY

7.0 NON-STORM WATER DISCHARGES

The permit requires that all discharge locations be evaluated for the presence of non-storm water discharges. Any unauthorized storm water discharges must be eliminated, or covered under another NPDES permit.

Storm water shall be defined to include all of the following non-storm water discharges provided pollution prevention controls for the non-storm water component are identified in the SWPPP:

- 1) Discharges from fire hydrant flushing
- 2) Potable water sources including water line flushing
- 3) Fire system test water
- 4) Irrigation drainage
- 5) Lawn watering
- 6) Routine building wash down which does not use detergents or other compounds
- 7) Pavement wash waters where contamination by toxic or hazardous materials have not occurred (unless all contamination by toxic or hazardous materials have been removed) and where detergents are not used
- 8) Air conditioning condensate
- 9) Springs
- 10) Uncontaminated ground water
- 11) Foundations or footing drains where flows are not contaminated with process materials such as solvents

Discharges from fire fighting activities are authorized by the permit, but are exempted from the requirement to be identified in the SWPPP.

The table below specifies what non-storm water discharges occur at the facility.

NON-STORM WATER DISCHARGE:	POLLUTION PREVENTION CONTROLS:	IMPACTED OUTFALL:
N/A		
		,

8.0 ANNUAL REVIEW

The permit requires that the permittee shall review the SWPPP annually after it is developed and maintain written summaries of the reviews. Based on the review, the permittee shall amend the SWPPP as needed to ensure continued compliance with the terms and conditions of the permit. The annual review is to be retained on site for three years and depending on the general permit is required to be submitted to the DEQ district office on or before January 10th of each year. The Annual Review Report Form is in Section 23.0.

9.0 CERTIFIED STORM WATER OPERATOR UPDATE

The permit requires that if the Certified Storm Water Operator is changed or an additional Certified Storm Water Operator is added, the permittee shall provide the name and certification number of the new Certified Storm Water Operator to the Department. If a facility has multiple Certified Storm Water Operators, the name and certification number of the Certified Storm Water Operators shall be included in the SWPPP.

10.0 RECORD KEEPING

The permit requires that the permittee shall maintain records of all SWPPP related inspection and maintenance activities. Records shall also be kept describing incidents such as spills or other discharges that can affect the quality of storm water runoff. All such records shall be retained for three years. The following records are required by the permit:

- ✓ Routine preventive maintenance inspection reports
- ✓ Routine good housekeeping inspection reports
- ✓ Comprehensive site inspection reports
- ✓ Employee training records
- ✓ Written summaries of the annual SWPPP review

11.0 SWPPP CERTIFICATION

The permit requires that the SWPPP shall be reviewed and signed by the Certified Storm Water Operator(s) and by either the permittee or an authorized representative in accordance with 40 CFR 122.22. The SWPPP shall be retained on-site at the facility which generates the storm water discharge.

I certify under penalty of law that the storm water drainage system in this SWPPP has been tested or evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. I certify under penalty of law that this SWPPP has been developed in accordance with the General Permit and with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. At the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

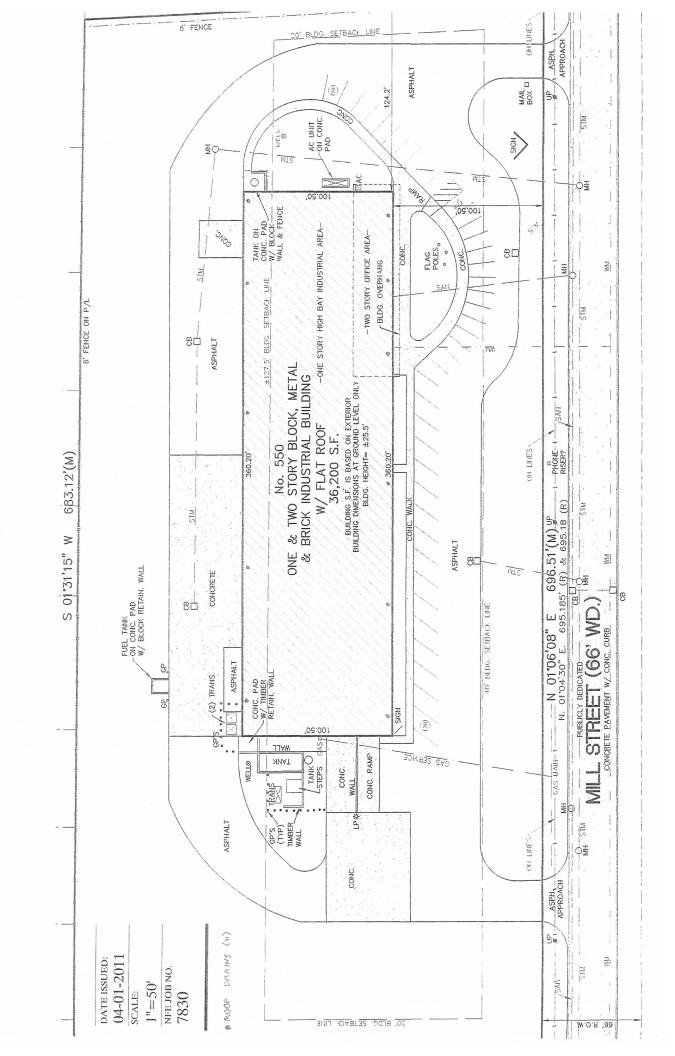
Permittee or Authori	zed Representative	
Printed Name & Title:	Dennis C Palmiter	
	President and CFO	
Signature & Date:		

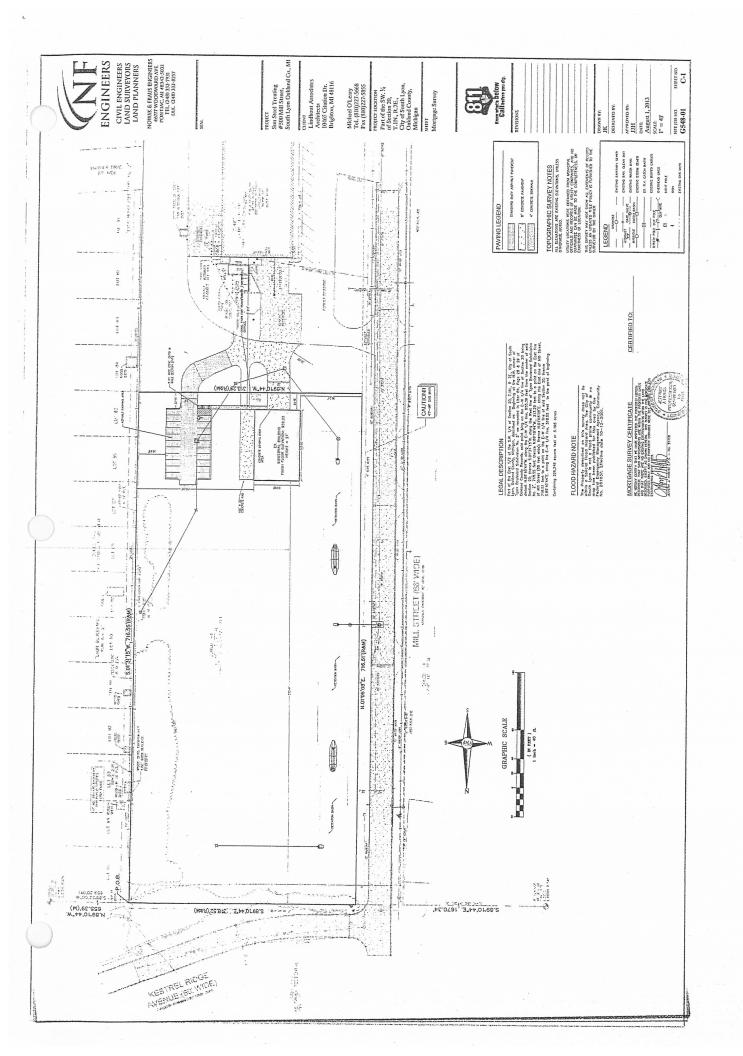
Certified Storm Water Operator	
Printed Name & Certification Number:	Dennis C Palmiter
	I-11784
Signature & Date:	

12.0 FIGURE 1 – FACILITY SITE MAP

SUN STEEL TREATING INC.

SWPPP SITE MAP





13.0 TABLE 1 – SIGNIFICANT MATERIAL INVENTORY AND DESCRIPTION OF INDUSTRIAL ACTIVITY OR SIGNIFICANT MATERIAL STORAGE AREAS

Instructions - The intent of this table is to ensure that facilities comply with Part I, Section C.1.b. of their industrial storm water permit. See sample table in Section 26 for reference. Fill out the applicable areas or activities in the corresponding sections. Add more lines as needed. Once you have described the area or activity, list the significant materials that are associated with the areas or activities, the exposure methods, and evaluate the level of exposure. Once that is completed indicate the inlet(s) and outfall(s) that would be impacted if significant materials were discharged from the areas or activities described.

Section Listed in General Permit	Storage Areas / Activity Areas	Significant Materials	Exposure Method	Reasonable Potential Evaluation	Inlet(s)	Outfalls(s)
1) Loading, unloading, and other material handling operations	N/A			(nigh,medium,low)		
2) Outdoor storage including secondary containment structures	North side of building, east corner outside 5000 gal tank, in containment	Diesel fuel for generators	Spring a leak.	Low		
	North end, east side of building, outside 500 gal tank, in containment	Diesel fuel for trucks	Spillage during fueling activities	High		
Section Listed in General Permit	Storage Areas / Activity Areas	Significant Materials	Exposure Method	Reasonable Potential Evaluation (high, medium, low)	Inlet(s)	Outfalls(s)
Outdoor manufacturing or processing activities	N/A					
4) Significant dust or particulate generating processes	Blast shed at north end of building, east side	Walnut shell dust	Outdoor cleanup of shed, particles that escape filters	High		

controls	Dust collector exhaust stack, on roof at NE corner	Salt bath processing dust	Particles that escape in-line filters	High	
	Dust collector exhaust stack, On roof at NW corner	Salt bath processing dust	Particles that escape in-line filters	High	
Section Listed in General Permit	Storage Areas / Activity Areas	Significant Materials	Exposure Method	Reasonable Inlet(s) Potential Evaluation (high medium low)	(s) Outfalls(s)
6) On-site waste disposal practices	Dumpster staging area, lower level, north end, east side of building, indoor 10 yard dumpster	General refuse	Spillage during loading and unloading	High	
	Dumpster staging area, outside, east side of building, north of center, 20 yard dumpster	Scrap metal	Spillage during loading and unloading	High	
	Dumpster staging area, inside, east side of building, lower level, north of center, 10 yard dumpster	Waste salt	Spillage during loading and unloading	High	
	600 gallon tank, inside, east side of building, lower level, south of center	Waste oil	Spillage during loading and pump-out	High	
	Water treatment tank, inside, lower level, north end, next to refuse dumpster	Waste water and precipitated sludge	Spillage during loading and pump-out	High	
					3

7) Maintenance and cleaning of vehicles, machines and equipment	N/A					
-						
8) Areas of exposed	N/A					
מומיסו פוסמוטופ אסווא						
13.0 TABLE 1 CONTINUED	CONTINUED					
Section Listed in General Permit	Storage Areas / Activity Areas	Significant Materials	Exposure Method	Reasonable Potential Evaluation (high medium low)	Inlet(s)	Outfalls(s)
9) Sites of Environmental Contamination listed under Part 201	N/A					
10) Areas of significant material residues	N/A					
11) Areas where animals congregate (wild or domestic) and deposit wastes	N/A					
12) Other areas where storm water may contact significant materials	Retention ponds, west side, 600 N Mill St	Storm water runoff	Heavy rainfall	High		

15.0 TABLE 3 – DESCRIPTION OF PREVENTATIVE MAINTENANCE / ROUTINE HOUSEKEEPING INSPECTIONS

Description of Area or Equipment	Tasks	Frequency
5000 Gal diesel fuel tank	Check for leaks	Weekly
500 Gal diesel fuel tank	Check for leaks and spills Check spill kit contents	Daily
Scrap steel dumpster, 20 yard	Check for leaks and spills, inspect cleanliness of area	Daily
General refuse dumpster, 10 yard	Check for spills, inspect cleanliness of area	Daily
Waste salt dumpster, 10 yard	Check for spills, inspect cleanliness of area	Daily
Water treatment tank	Check for leaks	Daily
600 Gal waste oil tank	Check for leaks and spills Check spill kit contents	Daily

16.0 TABLE 4 - MATERIAL HANDLING & SPILL PREVENTION / CLEAN-UP PROCEDURES

Potential Spill Area	Material Handling & Storage Procedures	Spill Response Procedures & Equipment
Waste salt dumpster, indoors	Disposal of waste salt into hazardous waste dumpster, pick-up of dumpster by waste hauler	Clean-up with shovel and broom
Refuse dumpster, indoors	Disposal of refuse into dumpster, pick- up of dumpster by waste hauler	Clean-up with shovel and broom
5000 gallon diesel fuel tank for generators	Spillage while filling, or leaks from tank or fittings	Self-containment area, use of absorbents, pig mats, or pump to an acceptable container. Notify management if necessary.
500 gallon diesel fuel tank for trucks	Spillage while refilling tank or refueling trucks	Protect nearby storm drain. Clean up spills utilizing the spill kit materials located in the generator area. Notify management if necessary.
600 gallon used oil tank	Spillage while filling or pump-out by waste hauler	Clean up spills using pig mats or absorbents. Dispose of properly. Notify management if necessary.
Water treatment tank	Spillage while filling or pump-out by waste hauler	Protect nearby storm drain. Clean up spills using pig mats or absorbents. Dispose of properly. Notify management if necessary.

17.0 TABLE 5 – SPILL KIT INVENTORY

List the spill response equipment that will be maintained in each location or locker (refer to MSDSs to determine recommended clean-up methods and supplies):

Person responsible for maintaining this inventory: _Dennis C Palmiter___

Locker number or	Absorbents (pads,	Tools (shovels,	Personal Protective	Other Supplies (warning	
location	booms, kitty litter,	brooms,	Equipment (rubber	tape, labels, markers,	
		(100) (200) (200)	etc.)		
Generator area	2 packages of pig	1 flat shovel	1 package of rubber	Warning tape	
	mats	1 push broom	gloves		
	2 50lb bags of	1 squeegee			
	absorbent material				

Label each spill kit with the words "SPILL KIT" and the necessary emergency telephone number(s) or pager number(s) of persons to be contacted in case of a spill or leak that is beyond the training and equipment available on or near each spill locker:

Facility Responsible Person/Phone Number: _Dennis C Palmiter_ Spill Response Contractor (if any)/Phone Number: _N/A_

DEQ District Office Phone Number:

DEQ 24-Hour Emergency Spill Reporting Hot-Line: 1-800-292-4706

Stencil the following warning on each spill kit:

CLEAN IT UP PROMPTLY AND DISPOSE OF THE WASTE PROPERLY." WARNING: NEVER HOSE DOWN A SPILL!

18.0 TABLE 6 - STRUCTURAL CONTOLS USED AT THE FACILITY

Description of Structural Control	Location of Structural Control	Significant Materials intended to be managed
N/A		

24.0 DEQ SPILL OR RELEASE REPORT



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

SPILL OR RELEASE REPORT

NOTE: Some regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures MUST be used and followed if reporting under those regulations. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706, or DEQ District Office that oversees the county where it occurred, and other regulating agencies and provide the following information. A follow-up written report may be required. Keep a copy of this report as documentation that the release was reported. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. See the DEQ website on Spill/Release Reporting for more reporting information.

Please print or type all information. NAME AND TITLE OF PERSON SUBMITTING WRITTEN REPORT TELEPHONE NUMBER (provide area code) NAME OF BUSINESS RELEASE LOCATION (provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.) STREET ADDRESS STATE ZIP CODE BUSINESS TELEPHONE NUMBER (provide area code) SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS (if applicable) COUNTY TIER/RANGE/SECTION TOWNSHIP RELEASE DATA. Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary. TYPE OF INCIDENT DATE & TIME OF RELEASE (if known) DATE & TIME OF DISCOVERY DURATION OF RELEASE (if known) ☐ Pipe/valve leak or rupture ☐ Vehicle accident ☐ Explosion days Fire hours Leaking container ☐ Other minutes ☐ Loading/unloading release am/pm am/pm MATERIAL RELEASED (Chemical or trade name) CAS NUMBER PHYSICAL STATE ESTIMATED QUANTITY RELEASED HAZARDOUS WASTE CODE RELEASED (indicate unit CHECK HERE IF ADDITIONAL MATERIALS LISTED ON ATTACHED PAGE. (indicate if solid, e.g. lbs, gals, cu ft or yds) liquid, or gas) FACTORS CONTRIBUTING TO RELEASE SOURCE OF LOSS □ Container Ship
Tank
Tanker ☐ Equipment failure □ Training deficiencies ☐ Truck Operator error ☐ Unusual weather conditions Railroad car ☐ Other ☐ Pipeline ☐ Faulty process design ☐ Other TYPE OF MATERIAL RELEASED MATERIAL LISTED ON or DEFINED BY IMMEDIATE ACTIONS TAKEN Agricultural: manure, pesticide, ☐ CAA Section 112(r) list (40 CFR Part 68) ☐ Containment Diversion of release to fertilizer CERCLA Table 302.4 (40 CFR Part 302) Dilution treatment Evacuation ☐ Chemicals EPCRA Extremely Hazardous Substance ☐ Decontamination of Flammable or combustible liquid (40 CFR Part 355) Hazard removal persons or equipment ☐ Neutralization ☐ System shut down Hazardous waste Michigan Critical Materials Register or permit ☐ Morno Monitoring Liquid industrial waste NREPA Part 31, Part 5 Rules polluting material Oil/petroleum products or waste NREPA Part 111 or RCRA hazardous waste NREPA Part 121 liquid industrial waste ☐ Sewage Other list Other_ Unknown Unknown RELEASE REACHED Distance from spill location to ☐ Surface waters (include name of river, lake, drain involved) _ surface water, in feet ☐ Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) ☐ Drain connected to storm sewer (include name of drain or water body it discharges into, if known) Groundwater (indicate if it is a known or suspected drinking water source and include name of aquifer, if known) Soils (include type e.g. clay, sand, loam, etc.) Ambient Air ☐ Spill contained on impervious surface

EXTENT OF INJURIES, IF ANY		WAS ANYONE HOSPITALIZED? Yes NUMBER HOSPITALIZED:	TOTAL NUMBER OF INJURIES TREATED ON-SITE:
		□ No	***************************************
DESCRIBE THE INCIDENT, THE TYPE OF EQUIPMENT INVOLVED IN THE RELEASE ENVIRONMENTAL DAMAGE CAUSED BY THE RELEASE. IDENTIFY WHO IMMEDIA name, contact person, and telephone number). ALSO IDENTIFY WHO DID FURTHED CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED OF	TELY RESPONDED TO THE INCIDENT (own ER CLEANUP ACTIVITIES, IF PERFORMED O	employees or contractor - inclu-	de cleanuo company
ESTIMATED QUANTITY OF ANY RECOVERED MATERIALS AND A DESCRIPTION OF CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED OF ASSESSMENT OF ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH (include regarding medical attention necessary for exposed individuals.)	o known acute or immediate and chronic or the second seco		
ICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED:	OTHER ENTITIES NOTIFIED:		
NTIAL CONTACT BY: ☐ Telephone ☐ Fax ☐ Email ☐ Other ATE/TIME INITIAL CONTACT:	☐ National Response Center (N☐ US Coast Guard Office:		ate: Time
PEAS: 800-292-4706 Log Number Assigned	□ Detroit □ Grand Haven □ Si □ US Department of Transporta □ US Environmental Protection □ 911 (or primary public safety signals)	tion Agency	
□ Cadillac □ Kalamazoo □ Office Geological Survey □ Crystal Falls □ Lansing □ Remediation and □ Detroit □ Newberry Redevelopment □ Gaylord □ Warren □ Waste and Hazardous	☐ Local Fire Department ☐ Local Police and/or State Poli ☐ Local Emergency Planning Co	ce	
☐ Grand Rapids ☐ Wyoming Materials DEO Office locations are subject to change ☐ Water Bureau	via MI SARA Title III Program Wastewater Treatment Plant Hazmat Team Local Health Department	Authority	
AME AND TITLE OF PERSON MAKING INITIAL REPORT:	□ Department of Labor & Econo □ Department of Labor & Econo □ Michigan Department of Agric □ Other	mic Growth Fire Safety	
EQ STAFF CONTACTED & PHONE NUMBER:	PERSON CONTACTED & PHON	E NUMBER:	
TE WRITTEN REPORT SUBMITTED SIGNATURE OF PERSON SUBMI			