

Industrial Storm Water Permits and No Exposure Certification for Printers

What do you mean my facility needs a storm water permit?

Storm water is runoff from precipitation, including rain, snow, and ice melt that can become contaminated with pollutants in quantities sufficient to adversely affect water quality. To control the amount of pollution that can cause contamination, the industrial stormwater discharge permit program was created. The industrial storm water discharge permit covers the *contamination* of storm water from contact with industrial materials stored outside or activities that may result in contamination. In lieu of this permit, facilities can submit a *No Exposure Certification* form verifying that no materials are exposed to storm water.

Printing facilities either need to apply for a permit or to certify No Exposure

Many printing operations may not realize they need to either obtain a storm water permit for or file a No Exposure certification. The table below shows the Standard Industrial Classification (SIC) codes of printing related industries that need to evaluate whether they need a permit or meet the criteria for no exposure.

Tier 2 Light Manufacturers—SIC & Description			
2650-2659	Paperboard Containers & Boxes	2700-2799	Printing, Publishing, & Allied Industries
2670-2679	Misc. Converted Paper Products		

How would a printing facility impact storm water?

Common sources of industrial storm water contamination include:

- open dumpsters
- open or partially covered compactors or dumpsters (no lids or overhang roofs)
- compressor and cooling system blow down
- hydraulic lines or pumps for compactors
- open empty drums or other containers that contained chemicals
- uncovered drainpipes outside the facility
- outside fuel dispensing operations
- contaminated or oil-soaked pallets
- uncovered loading dock platforms
- petroleum residuals or rusting/oxidation staining on the concrete or ground from past or present industrial activity
- uncovered aboveground storage tanks where chemicals or fuel oils are filled or dispensed
- outside storage of chemicals and/or empty containers
- visible traces of paint residue or process dust on roofs, driveways, or sides of buildings
- scrapped metal press components or other equipment stored outside or uncovered (oils and greases); rusting/oxidation on containers, scrap metal, or machinery
- material or vehicle storage areas, including uncovered dumpsters

Printing facilities may have only one or two, or maybe a few of these activities. If the facility has any of these condition present, an industrial storm water permit is needed and an application should be submitted. However, if all conditions of storm water exposure can be eliminated then it may be possible to qualify for the No Exposure Certification.



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How to eliminate sources of contamination and achieve No Exposure Certification

The first step would be to move all sources of contamination inside, provide a storm-resistant shelter, and/or dispose of unneeded materials. Storm-resistant shelters include completely roofed and walled buildings or structures, as well as structures with only a top cover but no side coverings, provided material under the structure is not otherwise subject to any run-on and subsequent runoff of storm water.

For some common situations that create exposure, here are potential ways to prevent contamination of storm water:

Lidded dumpsters containing waste materials: Containers must be completely covered, with **permanent covers** rather than temporary. There are permanent covers that allow easy open/close while adding or removing waste from the container. Containers must not leak, and should not have drain plugs or valves. Contents or fluids may not drain from containers or be spilled while loading containers onto a garbage truck. Uncovered storage of industrial refuse and trash is not allowed.

Transferring materials/products between buildings: This is allowed, provided the materials/products are protected from precipitation, leaks, and spills.

Particulate emissions from roof stacks and/or vents: Contact between storm water and particles emitted from roof stacks or vents MAY disqualify applicants for No Exposure Certification. Solid material discharged into the air from roof stacks or vents must be in accordance with the following applicable environmental protection regulations (e.g., air quality control standards):

- particles must not come into contact with or contaminate storm water
- deposits of particles or residuals not otherwise regulated must not be allowed to collect, move, or be swept away with storm water runoff
- pollutants from roof stacks or vents must not be “tracked out” or carried on the tires of vehicles
- OR facility must have permit coverage under the DNR’s Air Program

Above ground storage tanks (ASTs): ASTs located outside, but not filled or drained outside are generally allowed and not considered exposed.

- ASTs may fill or drain materials outside without exposure if transfer valves are used. Transfer valves are typically used to dispense heating oil, propane, butane, chemical feedstocks, or fuels such as gasoline, diesel, or compressed natural gas.
- EPA recommends, wherever feasible, that ASTs be surrounded by some type of **physical containment** (e.g., an impervious dike, berm, or concrete retaining structure) to prevent runoff in the event of a structural failure or leaking transfer valve. The containment **should not have a drain**, and when filled with liquid it should be pumped out and disposed properly.

Loading docks: Loading dock and other areas with petroleum residual staining may be covered over with asphalt to eliminate the possibility of contaminants being transported to water bodies or infiltrated into groundwater during storm water runoff events. In addition, use dry clean up methods for any spills from trucks rather than washing down surfaces and provide overhangs or door skirts to enclose trailer ends at truck loading/unloading docks.

Once sources of contamination are eliminated, complete and submit the No Exposure certification form to the DNR, and be sure to provide representative photos of the exterior of the facility. On a case-by-case basis, the DNR may inspect a facility to confirm that it qualifies. **Certification is required to be resubmitted every 5 years.**

The DNR’s No Exposure Certification form can be found at: <https://dnr.wi.gov/files/PDF/forms/3400/3400-188.pdf>.

What if our facility needs a permit?

If you cannot meet the No Exposure criteria, apply for a permit. Walk through the information on the Tier 2 permit on the Industrial storm water permit overview page: <https://dnr.wi.gov/topic/stormwater/industrial/overview.html>. Follow the links to the electronic permit application system. Along with the link to the ePermit system, there are training videos and a PDF help document on the permit forms page: <https://dnr.wisconsin.gov/topic/Stormwater/industrial/forms.html>.

You must meet the requirements in the Tier 2 permit until it is revised by the department. The general permits for storm water discharge have an expiration date, however you do not need to re-apply for the permit. The department will update the permit as appropriate and send you a new version when it is finalized.

In addition to obtaining a permit, you will need to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). DNR has created a manual on SWPPP development <https://dnr.wi.gov/topic/stormwater/documents/WTIndSWPPPManual.pdf>. Other documents to help understand the storm water management requirements are found on the publications page: <https://dnr.wisconsin.gov/topic/Stormwater/publications.html>.

Additional resources/information

Contact the local storm water staff with questions on potential areas of exposure, permits or submitting the No Exposure Certification form: <https://dnr.wi.gov/topic/stormwater/contacts.html>.

EPA has a fact sheet specific to storm water from Printing Facilities: https://www.epa.gov/sites/production/files/2015-10/documents/sector_x_printingpublishing.pdf.

What are some examples of exposure versus no exposure?

The following pictures show examples of similar scenarios where one demonstrates no exposure and the other shows exposure is likely.

Good



Untreated Wood Pallets with no contaminant staining/residuals



55-gallon drums are under cover and have secondary containment



Permanent hard covers on trash receptacle and luger box

Bad



Possible rusting metal materials; due to piling, condition of other materials is unknown



Fueling station does not have secondary containment, potential for damage to hoses, also, a rusting pipeline with valves.



Tarped luger boxes can only be on site during active construction, otherwise must have permanent covers, no rusting, holes, or valves to qualify for No Exposure Certification.

Good **Bad**



Permanent hard covers on trash receptacle and luger box



Lid is permanent, but not working properly—gaps.

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