



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

February 16, 2021

VIA E-MAIL

COMPLIANCE COMMUNICATION  
CC No. CC-003160

Mr. John Hicks  
Hajjar Plating-Wayne  
38300 Van Born Road,  
Wayne, Michigan 48184

Dear Mr. Hicks:

SUBJECT: Compliance Communication  
Per- and Polyfluoroalkyl Substances (PFAS)  
National Pollutant Discharge Elimination System (NPDES)  
Certificate of Coverage (COC) No. MIS210285  
Designated Name: Hajjar Plating-Wayne

On January 15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), staff conducted an inspection at the Micro Platers Sales Inc. facility known as Hajjar Plating, located at 38300 Van Born Road, in Wayne, Michigan (facility). The Hajjar Plating facility was issued the COC identified above under NPDES General Permit No. MIS210000 (Permit) to discharge storm water associated with industrial activity to the McClaughrey Drain. The purpose of the inspection was to determine compliance with the COC identified above; the Permit; and Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.3101 *et seq.*

Inspection participants were as follows:

- Mr. Walt Cisco, Hajjar Plating
- Mr. George Saleh, Consultant
- Ms. Maya Faber, EGLE-WRD

The inspection included a visual evaluation of the interior and exterior areas of the facility as well as a review of the facility's Storm Water Pollution Prevention Plan (SWPPP) and related documents.

During the evaluation of the exterior of the facility, the WRD staff observed the following conditions which may contribute pollutants to storm water runoff:

- Chrome-plated bumpers were observed upside-down, collecting storm water, and rusting. Bumpers should be stored so as not to collect storm water.
- Dust was observed collecting around the exterior of the dust collection system. This area must be cleaned up and additional controls must be implemented (such as routine inspections or improved seal) to prevent this material from being washed into the storm sewer system.

### **Storm Water Pollution Prevention Plan (SWPPP)**

A copy of the facility's SWPPP was provided at the time of the inspection and was reviewed by the WRD staff. At this time, the plan is outdated and does not meet the minimum requirements outlined in the Industrial Storm Water General Permit MIS210000. Additionally, the SWPPP did not contain visual assessment procedures as required by Part I.B.3.c.7 of the Permit. Hajjar Plating must develop and implement procedures meeting the requirements listed in the Permit.

For a detailed explanation of the required SWPPP revisions, please see the attached document, titled "EGLE Comments on Hajjar Plating-Wayne SWPPP".

### **Required Action**

**By March 16, 2021**, the Permittee shall submit a response to this letter via MiWaters. At a minimum, the response shall include:

1. **Short-Term Storm Water Characterization Study (STSWCS)**

During the inspection, the WRD staff explained the efforts being taken by the WRD to evaluate storm water discharges from industrial facilities that have used or are still using PFAS containing chemicals, specifically Perfluorooctanesulfonic acid (PFOS) and Perfluorooctanoic acid (PFOA), as part of their industrial processes. Industrial storm water discharges from the Facility have been identified by the WRD as having a high potential to contain elevated concentrations of PFAS chemicals. The WRD's position is based on elevated results of PFOS discovered downstream of the facility in the waterbody, elevated concentrations of PFOS identified in the industrial wastewater generated at the facility, and the historical use of PFAS containing chemicals at the facility.

Due to the information gathered during the inspection, the Facility is required to perform a STSWCS to ensure storm water discharges from the Facility are not causing or contributing to a violation of Water Quality Standards (WQS). Once correctly implemented, the STSWCS will generally align with visual assessment procedures.

A STSWCS [guidance document](#) and [template](#) are attached to this letter and also available on the WRD's Industrial Storm Water Web page at [Michigan.gov/IndustrialStormWater](http://Michigan.gov/IndustrialStormWater), and should be utilized to ensure an approvable plan is developed and submitted.

All laboratory results associated with the STSWCS shall be submitted via MiWaters upon receipt.

The STSWCS plan shall be submitted to the WRD for review and approval prior to implementation. The STSWCS shall include the following components:

- a. Grab samples collected at each regulated storm water discharge point during three separate qualifying rain events. However, if there is dry weather flow (indicative of groundwater infiltrating the storm sewer system after 72 hours from the most recent storm event) from any discharge point included in the STSWCS, the sampling plan shall include two wet weather and two dry weather sampling

events for a total of four separate sampling events.

- b. Provide the area, accurate to tenths of an acre, of the drainage area of each applicable discharge point.
- c. Samples shall be analyzed for:
  - i. PFOS and PFOA; however, the WRD recommends that all PFAS analytes included on EGLE's [PFAS Minimum Laboratory Analyte List](#) be included in the analysis. PFAS samples shall be analyzed using either ASTM D7979 or an isotope dilution method, sometimes referred to as Modified 537. Regardless of the method used, the Permittee should choose a laboratory with sufficient quality assurance/quality control practices and reporting and detection levels to meet the objectives of the STSWCS. All samplings shall be performed in accordance with appropriate sampling procedures for PFAS.

Sampling guidance is provided on the Michigan PFAS Action Response Team (MPART) [Web page](#). For storm water discharges, the [General PFAS Sampling Guidance](#) and [Wastewater PFAS Sampling Guidance](#) should be followed.

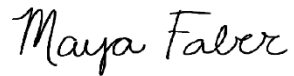
- ii. Hexavalent chromium, total copper, total lead, total nickel, total zinc, total suspended solids, pH, hardness, and chemical oxygen demand. The Permittee shall monitor and analyze the samples using approved United States Environmental Protection Agency methods under Title 40 of the Code of Federal Regulations, Part 136, Guidelines Establishing Procedures for the Analysis of Pollutants, and quantification levels identified in Table 7 of EGLE's [NPDES Appendix to the Permit Application](#).
  - d. An implementation schedule of the STSWCS that does not exceed six months from the WRD's approval of the STSWCS.
2. A copy of the updated SWPPP, including site map, required reporting form templates, and visual assessment procedures, for review by the WRD.
  3. A written description of the corrective actions taken to address the storm water concerns, identified during the site inspection, in the outdoor bumper storage area and the dust collection area. In addition, please provide documentation of the corrective actions including photographs, updates to standard operating procedures, etc.

Please be aware, compliance with the requirements outlined in this letter does not constitute a release or waiver of liability for compliance with the Permit or Part 31 of the NREPA.

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We appreciate your prompt attention to this matter. Should you have any questions regarding this letter or wish to schedule a meeting to discuss it, please contact me at; 248-497-2244 or FaberM@Michigan.gov.

Sincerely,



Maya Faber  
Environmental Quality Analyst  
Warren District Office  
Water Resources Division

Enclosure: EGLE Comments on Hajjar Plating SWPPP

Attachment(s) Short Term Storm Water Characterization Study Plan Template  
Short Term Storm Water Characterization Study Plan Checklist  
Short Term Storm Water Characterization Study Guidance  
EGLE PFAS Minimum Laboratory Analytes List for PFAS  
EGLE General PFAS Sampling Guidance  
EGLE Wastewater PFAS Sampling Guidance

cc: Mr. Walt Cisco, Hajjar Plating  
Mr. George Saleh, Consultant  
Ms. Stephanie Kammer, EGLE  
Ms. Melinda Steffler, EGLE-WRD  
Mr. Brian Zuber, EGLE