TOWNSHIP OF GROSSE ILE

STORM WATER
MANAGEMENT PROGRAM (SWMP)
&

PERMIT NO. MI0060062

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

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act (33 U.S.C. 1251 *et seq*., as amended; the "Federal Act"); Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); Part 41, Sewerage Systems, of the NREPA; and Michigan Executive Order 2019-06,

Township of Grosse Ile
9601 Groh Road
Grosse Ile, MI 48138

Table of Contents

National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Application Form (Reissuance)

version 1.8

(Submission #: 2PX-A2BD-BMS2, version 2)

Details

Submission ID	2PX-A2BD-BMS2
Submission Reason	Renewal
Status	Complete

Form Input

Existing Permit Details

Existing Permit ID (Read Only)
466560217908653213

Existing Permit Number (Read Only)
MIG610344

Section 1. Applicant Information

Applicant Information

Prefix
Mr.

First Name	Last Name
Derek	*Thiel*

Title
DPS Dierctor

Organization Name
Township of Grosse Ile

Phone Type	Number	Extension
Business	7346764422	228

Email
derekt@grosseile.com

Fax
NONE PROVIDED

Address

9601 Groh Road
Grosse Ile, MI 48138
US

Section 2. MS4 Location Information

Municipal Entity Name (e.g., City of Lansing)
Grosse Ile Twp MS4-Wayne

Identify the Primary Municipal Facility or the Mailing Address Location

A site needs to be identified as part of the application. Identify the physical address for the municipal entity, such as the primary municipal facility (e.g., City Hall).

Facility Location
42.1066703,-83.16417509999997

Section 3. MS4 Contacts (1 of 1)

CONTACTS

A contact must be provided for each of the roles listed below. You may assign more than one role to a single contact by holding down the 'Ctrl' key while selecting each role. Use the "+" (repeat section) button to add an additional contact.

Contact
Storm Water Billing Contact
Storm Water Program Manager
Application Contact

Contact

Prefix
Mr.

First Name	Last Name
Derek	*Thiel*

Title
DPS Director

Organization Name
NONE PROVIDED

Phone Type	Number	Extension
Business	7346764422	228

Email
derekt@grosseile.com

Fax
NONE PROVIDED

Address

9601 Groh Road

Grosse Ile, MI 48138

USA

Section 4: Regulated Area, Outfalls/Points of Discharge, and Nested Jurisdictions (1 of 1)

Regulated Area

Identify the urbanized area within the applicant's jurisdictional boundary as defined by the 2010 Census. The regulated MS4 means an MS4 owned or operated by a city, village, township, county, district, association, or other public body created by or pursuant to state law and the nested MS4 identified below that is located in an urbanized area and discharges storm water into surface waters of the state. The 2010 Census maps are located at the Urbanized Area Link below.
Urbanized Area Link

Select an Urbanized Area
Detroit

Outfall and Point of Discharge Information

Provide the following information for each of the applicant's MS4 outfalls and points of discharge within the regulated area: identification number, description of whether the discharge is from an outfall or point of discharge, and the surface water of the state that receives the discharge.

An outfall means a discharge point from an MS4 directly to surface waters of the state.

A point of discharge means a discharge from an MS4 to an MS4 owned or operated by another public body. In the case of a point of discharge, the surface water of the state is the ultimate receiving water from the final outfall.

Please note than an MS4 is not a surface water of the state. For example, an open county drain that is a surface water of the state is not an MS4.

An example table is available at the link below.
Outfall and Point of Discharge example table link

OUTFALL AND POINT OF DISCHARGE INFORMATION

GI-438 Table 1 Outfalls app v2.pdf - 10/17/2019 09:31 AM

Comment
See Appendix A

CORRECTION REQUEST *(APPROVED)*

Outfall Table needs more information.

Please indicate whether each discharge point is an "outfall" or a "point of discharge." Please see the definition of each above.
Created on 8/2/2019 1:31 PM by **Erica Volansky**

Nested Jurisdictions

Submit the name and general description of each nested MS4 for which a cooperative agreement has been reached to carry out the terms and conditions of the permit for the nested jurisdiction. The applicant shall be responsible for assuring compliance with the permit for those nested jurisdictions with which they have entered into an agreement and listed as part of the Application. If the primary jurisdiction and the nested jurisdiction agree to cooperate so that the terms and conditions of the permit are met for the nested MS4, the nested jurisdiction does not need to apply for a separate permit. A city, village, or township shall not be a nested jurisdiction.

Use the "+" (repeat section) button to add an additional Jurisdiction contact.

Nested Jurisdiction

Prefix
Ms.

First Name	Last Name
Linda	*Drzyzga*

Title
Business Manager

Organization Name
Grosse Ile Township Schools

Phone Type	Number	Extension
Business	7343622578	

Email
NONE PROVIDED

Fax
NONE PROVIDED

Address

[NO ADDRESS LINE 1 SPECIFIED]
23276 East River Road
Grosse Ile, MI 48138
USA

Section 5: General SWMP, Enforcement Response Procedure, and Public Participation/Involvement Program

STORM WATER MANAGEMENT PROGRAM (SWMP)

This Application requires a description of the Best Management Practices (BMPs) the applicant will implement for each minimum control measure and the applicable water quality requirements during this permit cycle. The applicant shall incorporate the BMPs to develop a SWMP as part of the Application. The SWMP shall be developed, implemented, and enforced to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable and protect water quality in accordance with the appropriate water quality requirements of the NREPA 451, Public Acts of 1994, Part 31, and the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq.). The Maximum Extent Practicable may be met by implementing the BMPs identified in the SWMP and demonstrating the effectiveness of the BMPs. The applicant shall attach any appropriate and necessary documentation to demonstrate compliance with the six minimum control measures and applicable water quality requirements as part of the Application.

The applicant shall complete this Application to the best of its knowledge and ensure that it is true, accurate, and meets the minimum requirements for a SWMP to the Maximum Extent Practicable.

Several minimum control measures include a statement requesting the applicant to indicate in the response if you are, or will be, working collaboratively with watershed or regional partners on any or all activities to meet the minimum control measure requirements. If the applicant chooses to work collaboratively with watershed or regional partners to implement parts of the SWMP, each applicant will be responsible for complying with the minimum permit requirements.

For purposes of this Application, a procedure means a written process, policy or other mechanism describing how the applicant will implement minimum requirements.

When answering the questions in this section of the Application, the applicant's MS4 encompasses what the applicant identified in Sections 4. The applicant shall include a measurable goal for each BMP. Each measurable goal shall include, as appropriate, a schedule for BMP implementation (months and years), including interim milestones and the frequency of the action. Each measurable goal shall have a measure of assessment to measure progress towards achieving the measurable goal. A United States Environmental Protection Agency (USEPA) guidance document on measurable goals is available at the link below.
USEPA measurable goals guidance document link

Enforcement Response Procedure (ERP)

The applicant shall describe the current and proposed enforcement responses to address violations of the applicant's ordinances and regulatory mechanisms identified in the SWMP. The following question represents the minimum requirement for the ERP. Please complete the question below.

ERP

APPENDIX B ERP_2of2 GI.pdf - 03/10/2017 10:18 AM
APPENDIX B ERP_1of2 GI v2.pdf - 10/17/2019 12:39 PM

Comment

See APPENDIX B for Enforcement Response Procedures (ERP)

CORRECTION REQUEST *(APPROVED)*

Where will enforcement tracking be stored?

Please state in the ERP where enforcement tracking will be stored. Indicate whether it will be electronic or hard copy form.
Created on 8/2/2019 1:41 PM by **Erica Volansky**

Public Participation/Involvement Program (PPP)

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the PPP to the maximum extent practicable, which shall be incorporated into the SWMP. Please indicate in your response if you are, or will be, working collaboratively with watershed or regional partners on any or all activities in the PPP during the permit cycle (i.e., identify collaborative efforts in the procedures). The following questions represent the minimum control measure requirements for the PPP. Please complete all the questions below. A measurable goal with a measure of assessment shall be included for each BMP, and, as appropriate, a schedule for implementation (months and years), including interim milestones and the frequency of the BMP. The responses shall reflect the nested MS4s identified in Section 4.

Proposing to work collaboratively on any or all activities in the PPP during the permit cycle?
Yes

PPP Procedures
APPENDIX C Public Participation Program GI.pdf - 03/10/2017 09:04 AM
Comment
See Appendix C for the Collaborative PPP

NOTE *(CREATED)*
APPROVED

Created on 8/2/2019 1:42 PM by **Erica Volansky**

2. Provide the reference to the procedure submitted above for making the SWMP available for public inspection and comment. The procedure shall include a process for notifying the public when and where the SWMP is available and of opportunities to provide comment. The procedure shall also include a process for complying with local public notice requirements, as appropriate. (page and paragraph of attachments): e.g., Attachment A, Page 3, Section b.
APPENDIX C, Page 2, II Communication Durring the SWMP Development Process, 1. & 2.

APPENDIX C, Page 2-3, III Procedures for Public Inspection, Comment and Participation in Implementation and Review, BMP 1.1 - BMP 1.4

3. Provide the reference to the procedure submitted above for inviting public involvement and participation in the implementation and periodic review of the SWMP. (page and paragraph of attachments):
APPENDIX C, Page 2-3, III Procedures for Public Inspection, Comment and Participation in Implementation and Review, BMP 1.1 - BMP 1.4

Section 6. Public Education Program

Proposing to work collaboratively on any or all activities in the PEP during the permit cycle?
Yes

PEP Procedures
Appendix D-ADW_PEP_04192019_approved(1).pdf - 10/14/2019 02:10 PM
Comment
See Appendix D: COLLABORATIVE PUBLIC EDUCATION PLAN

CORRECTION REQUEST *(APPROVED)*
Upload approved ADW PEP.

The ADW's PEP document was approved in April 2019. Please upload the final approved document. Be sure to update any appropriate references in applicable questions.
Created on 8/2/2019 1:42 PM by **Erica Volansky**

4. PEP activities may be prioritized based on the assessment of high priority, community-wide issues and targeted issues to reduce pollutants in storm water runoff. If prioritizing PEP activities, provide the reference to the procedure submitted above with the assessment and list of the priority issues (e.g., Attachment A, Section 1).
See Appendix D, Pg 6-7 Section III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

5. Provide the reference to the procedure submitted above identifying applicable PEP topics and the activities to be implemented during the permit cycle. If prioritizing, prioritize each applicable PEP topics as high, medium, or low based on the assessment in Question 4.

For each applicable PEP topic below, identify in the procedure the target audience; key message; delivery mechanism; year and frequency the BMP will be implemented; and the responsible party. If a PEP topic is determined to be not applicable or a priority issue, provide an explanation.

An example PEP table is available at the link below.
PEP table example link

A. Promote public responsibility and stewardship in the applicant's watershed(s). Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Collaborative Public Education Plan Table and Appendix D: Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3

B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3

C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity 8

D. Promote preferred cleaning materials and procedures for car, pavement, and power washing. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3,

E. Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3,

F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3,

G. Identify and promote the availability, location, and requirement of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #10: Promote county household hazardous waste reduction program

H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3,

I. Educate the public on, and promote the benefits of, green infrastructure and low impact development. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #9: Promote water resource protection workshops

J. Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to storm water runoff. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.
See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #4: Support green schools program with incentives to qualifying ADW schools

6. Provide the reference to the procedure submitted above for evaluating and determining the effectiveness of the overall PEP. The procedure shall include a method for assessing changes in public awareness and behavior resulting from the implementation of the PEP and the process for modifying the PEP to address ineffective implementation. e.g., Attachment A, Page 3, Section b.
See Appendix D: pg 15, Section VII. EVALUATION OF EFFECTIVENESS

Section 7. Illicit Discharge Elimination Program

>>Click here to access the MDEQ IDEP Compliance Assistance Document

>>Click here to access the Center for Watershed Protection guide

Proposing to work collaboratively on any or all BMPs in the IDEP during the permit cycle?
Yes

Illicit Discharge Ellimination Program Procedures
Appendix E -ADW_Collaborative_IDEP_approved Feb 2019.pdf - 10/14/2019 02:25 PM
Comment
See Appendix E

CORRECTION REQUEST ***(APPROVED)***
Upload approved ADW IDEP.

The ADW's IDEP document was approved in February 2019. Please upload the final approved document. Be sure to update any appropriate references in applicable questions.
Created on 8/2/2019 1:44 PM by **Erica Volansky**

Storm Sewer System Map

7. Provide the location where an up-to-date storm sewer system map(s) is available. The map(s) shall identify the following: the storm sewer system, the location of all outfalls and points of discharge, and the names and location of the surface waters of the state that receive discharges from the permittee's MS4 (for both outfalls and points of discharge). A separate storm sewer system includes: roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, and man-made channels. A storm sewer system map(s) may include available diagrams, such as certification maps, road maps showing rights-of-way, as-built drawings, or other hard copy or digital representation of the storm sewer system. (e.g., The Department of Public Works office)
Grosse Ile Township Department of Public Services Office and Township Engineers Office

Illicit Discharge Identification and Investigation
8. The MS4 may be prioritized for detecting non-storm water discharges during the permit cycle. The goal of the prioritization process is to target areas with high illicit discharge potential. If prioritizing, provide the reference to the procedure submitted above with the process for selecting each priority area using the list below. (e.g., Attachment A, page 3, Section b.)
- Areas with older infrastructure
- Industrial, commercial, or mixed use areas
- Areas with a history of past illicit discharges
- Areas with a history of illegal dumping
- Areas with septic systems
- Areas with older sewer lines or with a history of sewer overflows or cross-connections
- Areas with sewer conversions or historic combined sewer systems
- Areas with poor dry-weather water quality
- Areas with water quality impacts, including waterbodies identified in a Total Maximum Daily Load
- Priority areas applicable to the applicant not identified above

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix E: II. Priority Areas

9. If prioritizing dry-weather screening, provide the reference to the document submitted above with the geographical location of each prioritized area using either a narrative description or map and identify the prioritized areas that will be targeted during the permit cycle.
See Appendix E: IDEP #3 & IDEP #7

10. Provide the procedure for performing field observations at all outfalls and points of discharge in the priority areas as identified in the procedure above or for the entire MS4 during dry-weather at least once during the permit cycle. The procedure shall include a schedule for completing the field observations during the permit cycle or more expeditiously if the applicant becomes aware of a non-storm water discharge.

As part of the procedure, the applicant may submit an interagency agreement with the owner or operator of the downstream MS4 identifying responsibilities for ensuring an illicit discharge is eliminated if originating from the applicant's point(s) of discharge. The interagency agreement would eliminate the requirement for performing a field observation at that point(s) of discharge. Areas not covered by the interagency agreement shall be identified with a schedule for performing field observations included in the procedure.

The focus of the field observation shall be to observe the following:
- Presence/absence of flow
- Water clarity

- Deposits/stains on the discharge structure or bank
- Color
- Vegetation condition
- Odor
- Structural condition
- Floatable materials
- Biology, such as bacterial sheens, algae, and slimes

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix E: II. IDEP #3: Priority Area IDEP Advanced Investigations & Field Screening Procedure For Identifying Potential Illicit Discharges

11. Provide the reference to the procedure submitted above for performing field screening if flow is observed at an outfall or point of discharge and the source of an illicit discharge is not identified during the field observation. Field screening shall include analyzing the discharge for indicator parameters (e.g., ammonia, fluoride, detergents, and pH). The procedure shall include a schedule for performing field screening.
See Appendix E: II. IDEP #3: Priority Area IDEP Advanced Investigations; Advanced Investigation Flow Chart; & Field Screening Procedure For Identifying Potential Illicit Discharges

12. Provide the reference to the procedure submitted above for performing a source investigation if the source of an illicit discharge is not identified by field screening. The procedure shall include a schedule for performing a source investigation.
See Appendix E: IDEP #6: Visual Inspection during Routine Field Operations; Advanced Investigation Flow Chart

13. Provide the reference to the procedure submitted above for responding to illegal dumping/spills. The procedure shall include a schedule for responding to complaints, performing field observations, and follow-up field screening and source investigations as appropriate.
See Appendix E: IDEP #2: Environmental Hotline and Coordinated Complaint Response, Pollution Complaint Tracking Form

14. If prioritizing, provide the reference to the procedure submitted above for responding to illicit discharges upon becoming aware of such a discharge outside of the priority areas. The procedure shall include a schedule for performing field observations, and follow-up field screening and source investigation as appropriate. If not prioritizing, enter "Not Applicable."
See Appendix E: IDEP #3: Priority Area IDEP Advanced Investigations

15. Provide the reference to the procedure submitted above which includes a requirement to immediately report any release of any polluting materials from the MS4 to the surface waters or groundwaters of the state, unless a determination is made that the release is not in excess of the threshold reporting quantities in the Part 5 Rules, by calling the appropriate MDEQ District Office, or if the notice is provided after regular working hours call the MDEQ's 24-Hour Pollution Emergency Alerting System telephone number: 800-292-4706. (Example threshold reporting quantities: a release of 50 pounds of salt in solid form or 50 gallons in liquid form to waters of the state unless authorized by the MDEQ for deicing or dust suppressant.)
See Appendix E: IDEP #2: Environmental Hotline and Coordinated Complaint Response, IV. Legal Authority & State and Federal Regulatory Mechanisms

16. If the procedures requested in Questions 8 through 14 do not accurately reflect the applicant's procedure(s), provide the reference to the procedure(s) submitted above describing the alternative approach to meet the minimum requirements.
8-14 reflect procedures

17. Provide the reference to the procedure submitted above for responding to illicit discharges once the source is identified. The procedure shall include a schedule to eliminate the illicit discharge and pursue enforcement actions. The procedure shall also address illegal spills/dumping.
See Appendix E: IDEP #2: Environmental Hotline and Coordinated Complaint Response; IV Legal Authority; Advanced Investigation Flow Chart

IDEP Training and Evaluation

18. Provide the reference to the program submitted above to train staff employed by the applicant, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge to the regulated MS4, on the following topics. The program shall include a training schedule for this permit cycle. It is recommended that staff be trained more than once per permit cycle.
- Techniques for identifying an illicit discharge or connection, including field observation, field screening, and source investigation.
- Procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement

response.
- The schedule and requirement for training at least once during the term of this permit cycle for existing staff and within the first year of hire for new staff.

Provide the reference to the program submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix E: IDEP #4: Staff Training, IDEP #9: Volunteer Training

19. Provide the reference to the procedure submitted above for evaluating and determining the overall effectiveness of the IDEP. The procedure shall include a schedule for implementation. Examples of evaluating overall effectiveness include, but are not limited to, the following: evaluate the prioritization process to determine if efforts are being maximized in areas with high illicit discharge potential; evaluate the effectiveness of using different detection methods; evaluate the number of discharges and/or quantity of discharges eliminated using different enforcement methods; and evaluate program efficiency and staff training frequency.
See Appendix E: IDEP #10: Method to Evaluate IDEP Effectiveness

Illicit Discharge Ordinance or Other Regulatory Mechanism

20. Provide the reference to the in effect ordinance or regulatory mechanism submitted above that prohibits non-storm water discharges into the applicant's MS4 (except the non-storm water discharges addressed in Questions 21 and 22).
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

NOTE ***(CREATED)***
In effect ordinance is OK!

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21. Provide the reference to the ordinance or other regulatory mechanism submitted above that excludes prohibiting the discharges or flows from firefighting activities to the applicant's MS4 and requires that these discharges or flows only be addressed if they are identified as significant sources of pollutants to waters of the State. The ordinance shall not authorize illicit discharges; however, the applicant may choose to exclude prohibiting the discharges and flows from firefighting activities if they are identified as not being significant sources of pollutants to waters of the state.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

22. Provide the reference to the ordinance or other regulatory mechanism submitted above that excludes prohibiting the following categories of non-storm water discharges or flows if identified as significant contributors to violations of Water Quality Standards. The ordinance shall not authorize illicit discharges; however, the applicant may choose to exclude prohibiting the following discharges or flows if they are identified as not being a significant contributor to violations of Water Quality Standards.
a. Water line flushing and discharges from potable water sources
b. Landscape irrigation runoff, lawn watering runoff, and irrigation waters
c. Diverted stream flows and flows from riparian habitats and wetlands
d. Rising groundwaters and springs
e. Uncontaminated groundwater infiltration and seepage
f. Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits
g. Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
h. Air conditioning condensation
i. Waters from noncommercial car washing
j. Street wash water
k. Dechlorinated swimming pool water from single, two, or three family residences. (A swimming pool operated by the permittee shall not be discharged to a separate storm sewer or to surface waters of the state without NPDES permit authorization from the MDEQ.)

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

23. Provide the reference to the ordinance or regulatory mechanism submitted above that regulates the contribution of pollutants to the applicant's MS4 in the attachment above.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

24. Provide the reference to the ordinance or regulatory mechanism submitted above that prohibits illicit discharges, including illicit connections and the direct dumping or disposal of materials into the applicant's MS4 in the attachment above.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

25. Provide the reference to the ordinance or regulatory mechanism submitted above with the authority established to inspect, investigate, and monitor suspected illicit discharges into the applicant's MS4 in the attachment above.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

26. Provide the reference to the ordinance or regulatory mechanism submitted above that requires and enforces elimination of illicit discharges into the applicant's MS4, including providing the applicant the authority to eliminate the illicit discharge in the attachment above.
See Appendix E: IV Legal Authority; Advanced Investigation Flow Chart & Appendix B: ERP, the Township in the first year of the Permit will review the current Ordinance for improvement in language to explicitly address this item.

Section 8. Construction Storm Water Runoff Control Program

Proposing to work collaboratively on any or all requirements of the Construction Storm Water Runoff Control Program during the permit cycle?
No

Qualifying Local Soil Erosion and Sedimentation Control Programs

Click here to access the list of approved Part 91 Agencies

27. Is the applicant a Part 91 Agency?
No

If yes, choose type
NONE PROVIDED

No the applicant relies on the following Qualifying Local Soil Erosion and Sedimentation Control Program (Part 91 Agency)
Wayne County Land Resources Management Division (LRMD)

Construction Storm Water Runoff Control

Construction Storm Water Runoff Control Program Procedure Attachment
Appendix F-Part91 GI.pdf - 03/24/2017 02:46 PM
Comment
See Appendix F STANDARD OPERATING PROCEDURE CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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APPROVED
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28. Provide the reference to the procedure submitted above with the process for notifying the Part 91 Agency or appropriate staff when soil or sediment is discharged to the applicant's MS4 from a construction activity, including the notification timeframe. The procedure shall allow for the receipt and consideration of complaints or other information submitted by the public or identified internally as it relates to construction storm water runoff control. For non-Part 91 agencies, consideration of complaints may include referring the complaint to the qualifying local Soil Erosion and Sedimentation Control Program as appropriate. Construction activity is defined pursuant to Part 21, Wastewater Discharge Permits, Rule 323.2102 (K). The applicant may consider as part of their procedure when and under what circumstances the Part 91 Agency or appropriate staff will be contacted.
See Appendix F, Page 2, Section B

29. Provide the reference to the procedure submitted above with the requirement to notify the MDEQ when soil, sediment, or other pollutants are discharged to the applicant's MS4 from a construction activity, including the notification timeframe. Other pollutants include pesticides, petroleum derivatives, construction chemicals, and solid wastes that may become mobilized when land surfaces are disturbed. The applicant may consider as part of their procedure when and under what circumstances the MDEQ will be contacted.
See Appendix F, Page 3, Section D

30. Provide the reference to the procedure submitted above for ensuring that construction activity one acre or greater in total earth disturbance with the potential to discharge to the applicant's MS4 obtains a Part 91 permit, or is conducted by an approved Authorized Public Agency as appropriate. Note: For applicants that conduct site plan review, the procedure must be triggered at the site plan review stage.
See Appendix F, Page 2, Section B

31. Provide the reference to the procedure submitted above to advise the landowner or recorded easement holder of the property where the construction activity will occur of the State of Michigan Permit by Rule (Rule 323.2190).
See Appendix F, Page 3, Section E

Section 9. Post-Construction Storm Water Runoff Program

>>Click here to access the Low Impact Development Manual for Michigan. Chapter 9 of the manual provides a methodology for addressing post-construction storm water runoff.

The MDEQ has the following resources available to assist with development of a Post-Construction Storm Water Runoff Program.
>>Click here to access the Post-Construction Storm Water Runoff Program Compliance Assistance Document

Post-Construction Storm Water Runoff Program Procedures, Ordinances, and Regulatory Mechanisms
Appendix G _POSTCONSTRUCTION_ GI.pdf - 03/24/2017 03:07 PM
Comment
See Appendix G

NOTE ***(CREATED)***
APPROVED
Created on 8/2/2019 1:47 PM by **Erica Volansky**

Ordinance or Other Regulatory Mechanism

32. Provide the reference to the in-effect ordinance or regulatory mechanism submitted above to address post-construction storm water runoff from new development and redevelopment projects, including preventing or minimizing water quality impacts. The ordinance or other regulatory mechanism shall apply to private, commercial, and public projects, including projects where the applicant is the developer. This requirement may be met using a single ordinance or regulatory mechanism or a combination of ordinances and regulatory mechanisms. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

33. Provide the reference to the ordinance or other regulatory mechanism submitted above that applies to projects that disturb at least one or more acres, including projects less than an acre that are part of a larger common plan of development or sale and discharge into the applicant's MS4. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Federal Facilities
Federal facilities are subject to the Energy Independence and Security Act of 2007. Section 438 of this legislation establishes post-construction storm water runoff requirements for federal development and redevelopment projects.

34. Is the applicant the owner or operator of a federal facility with a storm water discharge
No, skip to Question 36

35. Provide the reference to the regulatory mechanism submitted above with the requirement to implement the post-construction storm water runoff control requirements in Section 438 of the Energy Independence and Security Act. If not available at this time,

provide the date the regulatory mechanism will be available.

The United States Environmental Protection Agency (USEPA) has a technical guidance available at the following link.
USEPA Technical Guidance on Implementing the Stormwater Runoff Requirements

Provide the reference to the regulatory mechanism submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
NONE PROVIDED

Water Quality Treatment Performance Standard
36. Does the ordinance or other regulatory mechanism include one or more of the following water quality treatment standards?

Treat the first one inch of runoff from the entire project site. Provide the ordinance or regulatory mechanism reference in the attachment above (page and paragraph of attachments): e.g., Attachment A, Pages 1-15
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Treat the runoff generated from 90 percent of all runoff-producing storms for the project site. Provide the ordinance or regulatory mechanism reference in the attachment above (page and paragraph of attachments): e.g., Attachment A, Pages 1-15
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

If no, provide the date the ordinance or regulatory mechanism will be submitted.
NONE PROVIDED

37. If the applicant has chosen the water quality treatment standard of requiring treatment of the runoff generated from 90 percent of all runoff-producing storms, what is the source of the rainfall data?

The MDEQ memo included in the sources below is available at the following link.
March 24, 2006 MDEQ memo providing the 90 percent annual non-exceedance storm statistics

Sources
NONE PROVIDED

Other rainfall data source (page and paragraph of attachments)
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

38. Provide the reference to the ordinance or regulatory mechanism submitted above with the requirement that BMPs be designed on a site-specific basis to reduce post-development total suspended solids loadings by 80 percent or achieve a discharge concentration of total suspended solids not to exceed 80 milligrams per liter. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Channel Protection Performance Standard
39. Provide the reference to the ordinance or regulatory mechanism submitted above with the requirement that the post-construction runoff rate and volume of discharges not exceed the pre-development rate and volume for all storms up to the two-year, 24-hour storm at the project site. At a minimum, pre-development is the last land use prior to the planned new development or redevelopment. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

A MDEQ spreadsheet is available to assist with these calculations at the following link.
Calculations for Storm Water Runoff Volume Control Spreadsheet

Provide the reference to the ordinance or regulatory mechanism submitted above.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

If pursuing an alternative approach, provide the reference to the ordinance or other regulatory mechanism submitted above describing the alternative to meet the minimum requirements, including an explanation as to how the channel protection standard will prevent or minimize water quality impacts.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

40. The channel protection performance standard is not required for the following waterbodies: the Great Lakes or connecting channels of the Great Lakes; Rouge River downstream of the Turning Basin; Saginaw River; Mona Lake and Muskegon Lake (Muskegon County); and Lake Macatawa and Spring Lake (Ottawa County). If applicable, provide the reference to the ordinance or regulatory mechanism submitted above that excludes any waterbodies from the channel protection performance standard. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Site-Specific Requirements

41. Provide the reference to the procedure submitted above for reviewing the use of infiltration BMPs to meet the water quality treatment and channel protection standards for new development or redevelopment projects in areas of soil or groundwater contamination in a manner that does not exacerbate existing conditions. The procedure shall include the process for coordinating with MDEQ staff as appropriate.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

42. Provide the reference to the ordinance or regulatory mechanism submitted above that requires BMPs to address the associated pollutants in potential hot spots as part of meeting the water quality treatment and channel protection standards for new development or redevelopment projects. Hot spots include areas with the potential for significant pollutant loading such as gas stations, commercial vehicle maintenance and repair, auto recyclers, recycling centers, and scrap yards. Hot spots also include areas with the potential for contaminating public water supply intakes. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Off-Site Mitigation and Payment in Lieu Programs

43. An applicant may choose to allow for the approval of off-site mitigation for redevelopment projects that cannot meet 100 percent of the performance standards on-site after maximizing storm water retention. Off-site mitigation refers to BMPs implemented at another location within the same jurisdiction and watershed/sewershed as the original project. A watershed is the geographic area included in a10-digit Hydrologic Unit Code and a sewershed is the area where storm water is conveyed by the applicant's MS4 to a common outfall or point of discharge. If proposing to allow for off-site mitigation, provide the reference to the ordinance or regulatory mechanism submitted above with the off-site mitigation requirements. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

44. An applicant may choose to allow for the approval of payment in lieu for projects that cannot meet 100 percent of the performance standards on-site after maximizing storm water retention. A payment in lieu program refers to a developer paying a fee to the applicant that is applied to a public storm water management project within the same jurisdiction and watershed/sewershed as the original project in lieu of installing the required BMPs onsite. The storm water management project may be either a new BMP or a retrofit to an existing BMP and shall be developed in accordance with the applicant's performance standards. A watershed is the geographic area included in a 10-digit Hydrologic Unit Code and a sewershed is the area where storm water is conveyed by the applicant's MS4 to a common outfall or point of discharge. If proposing to allow for payment in lieu, provide the reference to the ordinance or regulatory mechanism submitted above with the payment in lieu requirements. If not available at this time, provide the date the ordinance or regulatory mechanism will be available. If not pursuing the options available in Questions 43 and 44, skip to Question 52.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

45. Provide the reference the the ordinance or regulatory mechanism submitted above that establishes criteria for determining the conditions under which off-site mitigation and/or payment in lieu are available and require technical justification as to the infeasibility of on-site management. The determination that performance standards cannot be met on-site shall not be based solely on the difficulty or cost of implementing, but shall be based on multiple criteria related to the physical constraints of the project site, such as: too small of a lot outside of the building footprint to create the necessary infiltrative capacity even with amended soils; soil instability as documented by a thorough geotechnical analysis; a site use that is inconsistent with the capture and reuse of storm water; too much shade or other physical conditions that preclude adequate use of plants. The criteria shall also include consideration of the stream order and location within the watershed/sewershed as it relates to the water quality impacts from the original project site (e.g., the water quality impact from a project site with a discharge to a small-sized stream would be greater than a project site on a large river and an offset downstream of the project site may provide less water quality benefit.) The highest preference for off-site mitigation and in lieu projects shall be given to locations that yield benefits to the same receiving water that received runoff from the original project site. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

46. Provide the reference to the ordinance or regulatory mechanism submitted above that establishes a minimum amount of storm water to be managed on-site as a first tier for off-site mitigation or payment in lieu. A higher offset ratio is required if off-site mitigation or payment in lieu is requested for the amount of storm water identified as the first tier. For example, a minimum of 0.4 inches of storm water runoff shall be managed on-site as a first tier. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

47. Provide the reference to the ordinance or regulatory mechanism submitted above that requires an offset ratio of 1:1.5 for the amount of storm water above the first tier (identified in Question 46) not managed on-site to the amount of storm water required to be mitigated at another site or for which in-lieu payments shall be made. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

48. Provide the reference to the ordinance or regulatory mechanism submitted above requiring that if demonstrated by the developer to the applicant that it is completely infeasible to manage the first tier of storm water identified in Question 47 on-site, the offset ratio for the unmanaged portion is 1:2. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

49. Provide the reference to the ordinance or regulatory mechanism submitted above that requires a schedule for completing off-site mitigation and in-lieu projects. Off-site mitigation and in-lieu projects should be completed within 24 months after the start of the original project site construction. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

50. Provide the reference to the ordinance or regulatory mechanism submitted above that requires that offsets and in-lieu projects be preserved and maintained in perpetuity, such as deed restrictions and long-term operation and maintenance. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

51. Describe the tracking system implemented, or to be implemented, to track off-site mitigation and/or in-lieu projects.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

52. If there are any other exceptions to the performance standards (other than off-site mitigation and payment in lieu) being implemented or to be implemented during the permit cycle, provide the reference to the document submitted above describing the exception(s). The applicant shall demonstrate how the exception provides an equivalent or greater level of protection as the performance standards.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Site Plan Review

53. Provide the reference to the ordinance or regulatory mechanism submitted above that includes a requirement to submit a site plan for review and approval of post-construction storm water runoff BMPs. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

54. Provide the reference to the procedure submitted above for site plan review and approval. If not available at this time, provide the date the procedure will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

55. Provide the reference to the site plan review and approval procedure submitted above describing the process for determining how the developer meets the performance standards and ensures long-term operation and maintenance of BMPs in the attachment above. If not available at this time, provide the date the procedure will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Long-Term Operation and Maintenance of BMPs

56. Provide the reference to the ordinance or regulatory mechanism submitted above that requires the long-term operation and maintenance of all structural and vegetative BMPs installed and implemented to meet the performance standards in perpetuity. If not available at this time, provide the date the procedure will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

57. Provide the reference to the ordinance or regulatory mechanism submitted above that requires a maintenance agreement between the applicant and owners or operators responsible for the long-term operation and maintenance of structural and vegetative BMPs installed and implemented to meet the performance standards. If not available at this time, provide the date the procedure will be available.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

58. Does the maintenance agreement or other legal mechanism allow the applicant to complete the following? (Check if yes)
NONE PROVIDED

If any of the boxes above were not checked, provide a response explaining how the maintenance agreement or other legal mechanism allows the applicant to verify and ensure maintenance of the BMP.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

59. Provide the reference to the procedure submitted above for tracking compliance with a maintenance agreement or other legal mechanism to ensure the performance standards are met in perpetuity in the attachment above.
The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available within 6 months of being finalized.

Section 10. Pollution Prevention and Good Housekeeping Program

Pollution Prevention and Good Housekeeping Program Procedures

Appendix H PPGH_GENERAL_1of5 GI V2.0.pdf - 10/28/2019 03:38 PM
Appendix H PPGH_DPS_SOP 2 of 5 GI v2.0.pdf - 10/28/2019 03:38 PM
Appendix H School Trans. Bld. SPCC _3of5.pdf - 10/28/2019 03:38 PM
Appendix H P2GH_4of5 GI V2.pdf - 10/28/2019 03:38 PM
Appendix H PPGH_Checklist 5of 5.pdf - 10/28/2019 03:38 PM

Comment
See Appendix H

Municipal Facility and Structural Storm Water Control Inventory

60. Provide the reference to the up-to-date inventory submitted above identifying applicant-owned or operated facilities and storm water structural controls with a discharge of storm water to surface waters of the state. The inventory shall include the location of each facility. Provide an estimate of the number of structural storm water controls throughout the entire MS4 for each applicable category below (e.g., 100 catch basins and 7 detention basins). For example, Attachment A, Page 3, Section B.
See Appendix H: PPGH General, Table 1 & Checklist

CORRECTION REQUEST *(APPROVED)*
Location of facilities missing.

Each facility needs to have an address. Please correct.
Created on 8/2/2019 1:56 PM by **Erica Volansky**

Facilities that may have the high potential to discharge pollutants:
Bus Stations and Garages
Equipment storage and maintenance facilities
Materials storage and Public Works yards
Outdoor wash areas
Salt storage facilities

Check all applicant-owned or operated facilities with a discharge of storm water to surface waters of the state:
Administration buildings and libraries
Animal Control Building
Airports
Fire Stations
Police Stations
Public golf courses
Public parking lots
Public schools

Check all applicant-owned or operated structural storm water controls with a discharge of storm water to surface waters of the state:
Catch basins
Detention basins
Secondary containment
Vegetated swales

CORRECTION REQUEST *(APPROVED)*
Where are the other structural controls?

Detention basins and vegetated swales are listed as a structural controls but are not listed in Appendix H Table 1. Please review structural control table and correct as necessary.
Created on 8/2/2019 1:59 PM by **Erica Volansky**

61. Provide the location where an up-to-date map (or maps) is available with the location of the facilities and structural storm water controls identified in Question 60. The location of the facilities and structural storm water controls may be included on the storm sewer system map maintained for the IDEP. The map (or maps) is available at the following location: (e.g., The Department of Public Works office)
Grossse Ile Township Hall, DPS Building, Grosse Ile School District Central Office, and Township Engineer's Office

62. Provide the reference to the procedure submitted above for updating and revising the inventory in Question 60 and map (or maps) identified in Question 61 as facilities and structural storm water controls are added, removed, or no longer owned or operated by the applicant in the attachment above. A suggested timeframe for updating/revising the inventory and map(s) is 30 days following adding/removing a facility or structural storm water control.
Appendix H PPGH General Section C

CORRECTION REQUEST *(APPROVED)*

Update inventory timeframe is too long.

The timeframe for updating/revising the inventory is too long. EGLE recommends a timeframe of 30 days. Please correct.
Created on 8/2/2019 2:03 PM by **Erica Volansky**

Facility-Specific Storm Water Management

63. Provide the reference to the procedure submitted above for assessing each facility identified in Question 60 for the potential to discharge pollutants to surface waters of the state. The procedure shall include a process for updating and revising the assessment. A recommended timeframe for updating/revising the assessment is 30 days prior to discharging storm water from a new facility and within 30 days of determining a need to update/revise the facility assessment.

The applicant should consider the following factors when assessing each facility:
- Amount of urban pollutants stored at the site (e.g., sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
- Identification of improperly stored materials
- The potential for polluting activities to be conducted outside (e.g., vehicle washing)
- Proximity to waterbodies
- Poor housekeeping practices
- Discharge of pollutants of concern to impaired waters

If the applicant does not own a facility that discharges storm water to surface waters of the state in the urbanized area, skip to Question 71.

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
Appendix H PPGH General Section B

If not applicable
NONE PROVIDED

64. Provide the reference to the list of prioritized facilities submitted above using the assessment in Question 63. Each facility shall be prioritized based on having the high, medium, or low potential to discharge pollutants to surface waters of the state. Facilities with the high potential for pollutant runoff shall include, but are not limited to, the applicant's fleet maintenance and storage yards. The applicant may choose to demonstrate how a fleet maintenance/storage yard has the low potential to discharge pollutants to surface waters of the state. If demonstrating a low potential, provide the reference to the demonstration submitted above for the fleet maintenance and/or storage yard.
See Appendix H: PPGH General, Section D

CORRECTION REQUEST *(APPROVED)*

Correct application question.

This should read Appendix H Section D.
Created on 8/2/2019 2:04 PM by **Erica Volansky**

65. Is a site-specific standard operating procedure (SOP) available identifying the structural and non-structural storm water controls implemented and maintained to prevent or reduce pollutant runoff at each facility with the high potential for pollutant runoff? The SOP shall be available at each facility with the high potential for pollutant runoff and upon request from the MDEQ. The SOP shall identify the person responsible for oversight of the facility. The MDEQ may request the submission of the SOP during the application review process.
Yes, a site-specific SOP is available at each facility with the high potential for pollutant runoff

66. Provide the reference in the SOP, for each facility with the high potential for pollutant runoff, to the following: the list of significant materials stored on-site that could pollute storm water; the description of the handling and storage requirements for each significant material; and the potential to discharge the significant material. (SOP Reference Example: DPW Yard SOP Section 2)
See Appendix H: PPGH General, Section E, DPS SOP , & School Trans SPCC

CORRECTION REQUEST *(APPROVED)*

Indicate potential to discharge.

The list of significant materials stored on-site that need to indicate the potential to discharge for each significant material. Please correct in the DPS SOP.
Created on 8/5/2019 3:03 PM by **Erica Volansky**

67. Provide the reference in the SOP, for each facility with the high potential for pollutant runoff, identifying the good housekeeping practices implemented at the site. Good housekeeping practices include keeping the facility neat and orderly, properly storing and covering materials, and minimizing pollutant sources to prevent or reduce pollutant runoff. (SOP Reference Example: DPW Yard SOP ⁄ Section 2)
See Appendix H PPGH DPS SOP Section H

68. Provide the reference in the SOP, for each facility with the high potential for pollutant runoff, to the description and schedule for conducting routine maintenance and inspections of storm water management and control devices to ensure materials and equipment are clean and orderly and to prevent or reduce pollutant runoff. A biweekly schedule is recommended for routine inspections. (SOP Reference Example: DPW Yard SOP ⁄ Section 2)
See Appendix H PPGH DPS SOP Section H

CORRECTION REQUEST *(APPROVED)*

Provide routine inspection schedule.

Need a schedule for conducting routine inspections of storm water management and control devices at the DPS facility. A biweekly schedule is recommended for routine inspections.
Created on 8/5/2019 3:22 PM by **Erica Volansky**

69. Provide the reference in the SOP, for each facility with the high potential for pollutant runoff, to the description and schedule for conducting a comprehensive site inspection at least once every six months. The comprehensive inspection shall include an inspection of all structural storm water controls and a review of non-structural storm water controls to prevent or reduce pollutant runoff. (SOP Reference Example: DPW Yard SOP ⁄ Section 2)
See Appendix H PPGH DPS SOP Section H

70. Provide the reference to the procedure submitted above identifying the BMPs currently implemented or to be implemented during the permit cycle to prevent or reduce pollutant runoff at each facility with the medium and lower potential for the discharge of pollutants to surface waters of the state using the assessment and prioritized list in Questions 63 and 64.
See Appendix H PPGH General Section Table 1

Structural Storm Water Control Operation and Maintenance Activities

71. Provide the reference to the procedure submitted above for prioritizing each catch basin for routine inspection, maintenance, and cleaning based on preventing or reducing pollutant runoff. The procedure shall include assigning a priority level for each catch basin and the associated inspection, maintenance and cleaning schedule based on preventing or reducing pollutant runoff. The procedure shall include a process for updating/revising the priority level for a catch basin giving consideration to inspection findings and citizen complaints. A recommended timeframe for updating/revising the procedure is 30 days following the construction of a catch basin or a change in priority level. If the applicant does not own or operate catch basins skip to Question 75.
See Appendix H PPGH General Section Section G

CORRECTION REQUEST *(APPROVED)*

Need a maintenance and cleaning schedule for each priority level.

An inspection frequency of "as needed" does not meet permit requirements. In the event the City identifies a medium or high priority catch basin(s), the City will need a schedule for how often they will be inspected. Please provide these schedules.
Created on 8/5/2019 4:45 PM by **Erica Volansky**

CORRECTION REQUEST *(APPROVED)*

Update procedure timeframe is too long.

The timeframe for updating/revising this procedure is too long. EGLE recommends a timeframe of 30 days. Please correct.
Created on 8/5/2019 3:59 PM by **Erica Volansky**

72. Provide the reference to the narrative description or map submitted above with the geographic location of the catch basins in each priority level.
See Appendix H PPGH General, Section G

73. Provide the reference to the procedure submitted above for inspecting, cleaning, and maintaining catch basins to ensure proper performance. Proper cleaning methods include ensuring accumulated pollutants are not discharged during cleaning and are removed prior to discharging to surface waters of the state. An MDEQ Catch Basin Cleaning Activities guidance document is available at the following link.
Catch Basin Cleaning Activities Guidance Document

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix H PPGH General, Sections G &H

CORRECTION REQUEST *(APPROVED)*

Clarify when visual inspections occur.

Need to have an actual timeframe here. During normal work activities is not clear enough.
Created on 8/6/2019 10:29 AM by **Erica Volansky**

CORRECTION REQUEST *(APPROVED)*

Correct catch basin cleaning criteria.

Catch basins should be cleaned out when they are determined to be 50% full. Please include this in Appendix H Section G.
Created on 8/6/2019 10:27 AM by **Erica Volansky**

74. Provide the reference to the procedure submitted above for dewatering, storage, and disposal of materials extracted from catch basins. An MDEQ Catch Basin Cleaning Activities guidance document is available at the following link.
Catch Basin Cleaning Activities Guidance Document

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix H PPGH General, Sections G &H

75. If the applicant owns or operates structural storm water controls identified in Question 60, excluding the structural storm water controls included in an SOP as part of Question 65 and catch basins, provide the reference to the procedure submitted above for inspecting and maintaining the structural storm water controls. The procedure shall include a description and schedule for inspecting and maintaining each structural storm water control and the process for disposing of maintenance waste materials. The procedure shall require that controls be maintained to reduce to the maximum extent practicable the contribution of pollutants to storm water. The procedure shall include a process for updating/revising the procedure to ensure a maintenance and inspection program for each structural storm water control. A recommended timeframe for updating/revising the procedure is 30 days following the implementation of a new structural storm water control.
See Appendix H PPGH General, Sections G &H

CORRECTION REQUEST ***(APPROVED)***

Please address other structural stormwater controls.

In Q. 60, vegetated swales are listed as a structural controls. Please include a description and schedule for inspecting and maintaining these structural controls. Include the process for disposing of maintenance waste materials. The procedure shall also include a process for updating/revising the procedure to ensure a maintenance and inspection program for each structural storm water control. A recommended timeframe for updating/revising the procedure is 30 days following the implementation of a new structural storm water control.
Created on 8/6/2019 10:58 AM by **Erica Volansky**

76. Provide the reference to the procedure submitted above requiring new applicant-owned or operated facilities or new structural storm water controls for water quantity be designed and implemented in accordance with the post-construction storm water runoff control performance standards and long-term operation and maintenance requirements.
See Appendix H PPGH General, Section K

Municipal Operations and Maintenance Activities

77. Provide the reference to the procedure(s) submitted above with the assessment of the following operation and maintenance activities, if applicable, for the potential to discharge pollutants to surface waters of the state. The assessment shall identify all pollutants that could be discharged from each applicable operation and maintenance activity and the BMPs being implemented or to be implemented to prevent or reduce pollutant runoff. The procedure shall include a process for updating and revising the assessment. A suggested timeframe for updating/revising the assessment is 30 days following adding/removing BMPs to address new and existing operation and maintenance activities.

At a minimum, the procedure shall include assessing the following municipal operation and maintenance activities if applicable (check all that apply):
Road, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)
Cold weather operations (e.g., plowing, sanding, application of deicing agents, and snow pile disposal)
Vehicle washing and maintenance of applicant-owned vehicles (e.g., police, fire, school bus, public works)

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix H DPS SOP sections D-H & School SPCC

78. Provide the reference to the procedure submitted above for prioritizing applicant-owned or operated streets, parking lots, and other impervious infrastructure for street sweeping based on the potential to discharge pollutants to surface waters of the state. The procedure shall include assigning a priority level for each parking lot and street and the associated cleaning schedule (i.e., sweeping frequency and timing) based on preventing or reducing pollutant runoff. The procedure shall include a process for updating/revising the priority level giving consideration to street sweeping findings and citizen complaints. A recommended timeframe for updating/revising the prioritization is 30 days following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface or within 30 days of identifying a need to revise a priority level. If the applicant does not own or operate any streets, parking lots, or other impervious infrastructure, skip to Question 82.
See Appendix H PPGH General, Sections I &H

CORRECTION REQUEST ***(APPROVED)***

Update priority level timeline is too long.

A recommended timeframe for updating/revising the prioritization is 30 days following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface or within 30 days of identifying a need to revise a priority level.
Created on 8/6/2019 2:13 PM by **Erica Volansky**

79. Provide the reference to the narrative description or map submitted above with the geographic location of the streets, parking lots, and other impervious surfaces in each priority level.
See Appendix H PPGH General, Sections I &H

80. Provide the reference to the procedure submitted above identifying the sweeping methods based on the applicant's sweeping equipment and use of additional resources in sweeping seasonal leaves or pick-up of other materials. Proper sweeping methods include operating sweeping equipment according to the manufacturers' operating instructions and to protect water quality.
See Appendix H PPGH General, Sections I &H

81. Provide the reference to the procedure submitted above for dewatering, storage, and disposal of street sweeper waste material. An MDEQ Catch Basin Cleaning Activities guidance document is available at the following link and includes information on street sweeping requirements.
Catch Basin Cleaning Activities Guidance Document

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix H PPGH General, Section H

Managing Vegetated Properties

82. If the applicant's pesticide applicator does not exclusively use ready-to-use products from the original container, provide the reference to the procedure submitted above requiring the applicant's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land. A description of the certified applicator categories is available at the following link. If the applicant only applies ready-to-use products from the original container, enter "Not Applicable."
Commercial Pesticide Application Certification Categories

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
See Appendix H PPGH General, Section L

Contractor Requirements and Oversight

83. Provide the reference to the procedure submitted above requiring contractors hired by the applicant to perform municipal operation and maintenance activities comply with all pollution prevention and good housekeeping BMPs as appropriate. The procedure shall include the process implemented for providing oversight of contractor activities to ensure compliance.
See Appendix H PPGH General, Section N

Employee Training

84. Provide the reference to the employee training program submitted above to train employees involved in implementing or overseeing the pollution prevention and good housekeeping program. The program shall include the training schedule. At a minimum, existing staff shall be trained once during the permit cycle and within the first year of hire for new staff.
See Appendix H PPGH General, Section M

Section 11. Total Maximum Daily Load Implementation Plan

The USEPA has a document to assist with developing a TMDL Implementation Plan available at the following link.
Understanding Impaired Waters and Total Maximum Daily Load (TMDL) Requirements for Municipal Stormwater Programs

Total Maximum Daily Load Implementation Plan
Appendix I -adw_tmdl_plan_2019_final egle.pdf - 10/17/2019 09:35 AM
Comment
See Appendix I

CORRECTION REQUEST ***(APPROVED)***

Upload approved MAy 2019 ADW TMDL plan.

The ADW's TMDL Plan document was approved in May 2019. Please upload the final approved document. Be sure to update any appropriate references in applicable questions. Also, please make sure that the document provided lists the Detroit River as a TMDL area.
Created on 8/6/2019 3:31 PM by **Erica Volansky**

Proposing to work collaboratively on any or all activities in the TMDL Implementation Plan during the permit cycle.
Yes

85. If a TMDL(s) was included in the applicant's application notice, provide the name(s) below. If no TMDL was identified, skip to the next section.
See Appendix I: Section I, Detroit River-TMDL for E.coli, Wayne, Oakland, and Washtenaw Counties.

86. Provide the reference to the procedure submitted above describing the process for identifying and prioritizing BMPs currently being implemented or to be implemented during the permit cycle to make progress toward achieving the pollutant load reduction requirement in each TMDL identified in Question 85. The procedure shall include a process for reviewing, updating, and revising BMPs implemented or to be implemented to ensure progress in achieving the TMDL pollutant load reduction.
See Appendix I: Section II & IV

87. Provide the reference to the TMDL BMP Priority List submitted above with prioritized BMPs currently being implemented or to be implemented during the permit cycle to make progress toward achieving the pollutant load reduction requirement in each TMDL identified in Question 85. Each BMP shall include a reference to the targeted TMDL pollutant.
See Appendix I: Section IV & Pg 1a-2a, SWMP Priority Actions for TMDL Progress

88. Provide the reference to the TMDL Monitoring Plan submitted above for assessing the effectiveness of the BMPs currently being implemented, or to be implemented, in making progress toward achieving the TMDL pollutant load reduction requirement, including a schedule for completing the monitoring. Monitoring shall be specifically for the pollutant identified in the TMDL. Monitoring may include, but is not limited to, outfall monitoring, in-stream monitoring, or modeling. At a minimum, monitoring shall be conducted two times during the permit cycle or at a frequency sufficient to determine if the BMPs are adequate in making progress toward achieving the TMDL pollutant load reduction. Existing monitoring data may be submitted for review as part of the plan to meet part of the monitoring requirement.
See Appendix I: Pg 2-3, III Monitoring Plan

Note: Please reference Submissions to DEQ Under Grosse Ile Township WWTP WLA for Sanitary Waste Water (Permit/ Certificate of Coverage MI0026191) for lab/ testing results and other details.

Section 12. Phase I only – Industrial Facility Inspection Program

Industrial Facility Inspection Program Procedures
NONE PROVIDED
Comment
NONE PROVIDED

89. Provide the reference to the procedure submitted above describing the process for identifying existing industrial facilities, as defined below, within the applicant's jurisdiction that discharge stormwater to the applicant's MS4.

Industrial facilities include, but are not limited to, the following:
- Industrial facilities that the applicant determines are contributing a substantial pollutant loading to the MS4
- Industrial facilities subject to the Superfund Amendments and Reauthorization Act (SARA)
- Hazardous waste treatment, disposal, storage, and recovery facilities

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
NONE PROVIDED

90. Provide the reference to the inventory of industrial facilities submitted above using the procedure in Question No. 89.
NONE PROVIDED

91. Provide the reference to the procedure submitted above for prioritizing the industrial facilities identified in Question No. 90 for inspection. Each industrial facility shall be evaluated and prioritized based on having a high, medium or low potential to discharge pollutants to the applicant's MS4. The procedure shall include a process for updating and revising the prioritization, including modifying the priority level based on contribution of significant pollutant loading to the MS4, inspection findings, and the potential to discharge pollutants.

The applicant should consider the following factors when prioritizing an industrial facility:
- Pollutant sources stored on site
- Pollutants of concern
- Proximity to impaired surface waters of the state
- The applicant's violation or complaint history with the facility

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
NONE PROVIDED

92. Provide the reference to the list of the prioritized industrial facilities for inspection submitted above.
NONE PROVIDED

93. Provide the reference to the procedure submitted above for inspecting industrial facilities based on the prioritized list in Question No. 92 to evaluate pollutant source controls. The number or percentage of facilities to be inspected (e.g., 20% annually) or the inspection frequency for the different priority levels (e.g., high priority facilities inspected annually) shall be identified with the highest priority facilities receiving more frequent inspections. The procedure shall include a process for inspecting facilities based on complaints concerning pollutants discharged to the applicant's MS4.

At a minimum, inspections shall include an evaluation of BMPs implemented and maintained to control pollutant sources at the industrial facility and for evidence of unauthorized discharges, illicit connections, and potential discharges of pollutants to the applicant's MS4.

The procedure shall include notifying the applicable Water Resources Division District Office if an industrial facility appears to be in violation of the NPDES industrial stormwater program.

Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.
NONE PROVIDED

94. Provide the reference to the employee training program submitted above to train employees whose primary job duties are to implement the industrial facility inspection program. The program shall include the training schedule. At a minimum, existing staff shall be trained once during the permit cycle and new hires within the first year of their hire date. The training shall cover facility inspection procedures.
Click here to access the State of Michigan Industrial Stormwater program page

Provide the reference to the program submitted above (page and paragraph of attachments): e.g., Attachment A, Page 3, Section b.
NONE PROVIDED

Section 13. Certify and Submit

Comments (As needed)
NONE PROVIDED

Additional Documents (As needed)
NONE PROVIDED
Comment
NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
10/28/2019 3:38 PM	Appendix H PPGH_Checklist 5of 5.pdf	Attachment	Brent Florek
10/28/2019 3:38 PM	Appendix H P2GH_4of5 GI V2.pdf	Attachment	Brent Florek
10/28/2019 3:38 PM	Appendix H School Trans. Bld. SPCC _3of5.pdf	Attachment	Brent Florek
10/28/2019 3:38 PM	Appendix H PPGH_DPS_SOP 2 of 5 GI v2.0.pdf	Attachment	Brent Florek
10/28/2019 3:38 PM	Appendix H PPGH_GENERAL_1of5 GI V2.0.pdf	Attachment	Brent Florek
10/17/2019 12:39 PM	APPENDIX B ERP_1of2 GI v2.pdf	Attachment	Brent Florek
10/17/2019 9:35 AM	Appendix I -adw_tmdl_plan_2019_final egle.pdf	Attachment	Brent Florek
10/17/2019 9:31 AM	GI-438 Table 1 Outfalls app v2.pdf	Attachment	Brent Florek
10/14/2019 2:25 PM	Appendix E -ADW_Collaborative_IDEP_approved Feb 2019.pdf	Attachment	Brent Florek
10/14/2019 2:10 PM	Appendix D-ADW_PEP_04192019_approved(1).pdf	Attachment	Brent Florek
3/24/2017 3:07 PM	Appendix G _POSTCONSTRUCTION_ GI.pdf	Attachment	Brent Florek
3/24/2017 2:46 PM	Appendix F-Part91 GI.pdf	Attachment	Brent Florek
3/10/2017 10:18 AM	APPENDIX B ERP_2of2 GI.pdf	Attachment	Brent Florek
3/10/2017 9:04 AM	APPENDIX C Public Participation Program GI.pdf	Attachment	Brent Florek

Status History

	User	Processing Status
10/14/2019 1:41:03 PM	Brent Florek	Draft
10/28/2019 3:45:16 PM	Derek Thiel	Submitted
5/28/2021 1:15:16 PM	Elaine Wild	Complete

Audit

Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Volansky	8/2/2019 1:31 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	8/6/2019 3:48 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	11/18/2019 12:39 PM

Revisions

Revision	Revision Date	Revision By
Revision 1	3/31/2017 12:06 PM	Lorinda Beneteau
Revision 2	10/14/2019 1:41 PM	Brent Florek

Appendix A

TOWNSHIP OF GROSSE ILE

Point Source Identification

#	Receiving Water	Location & Description	Outfall / Point of Discharge
0	Thorofare Canal	N42˚ 08' 07.4" , W083˚ 09' 31.5", 42" RCP	Outfall
1	Trenton Channel	west of West River at Highland, 24" sewer	Outfall
2	Trenton Channel	west of West River at Byromar, 24" sewer	Outfall
3	Thorofare Canal	north of Church and on east side of Thorofare Canal, 30" sewer	Outfall
4	Wayne County sewer	west of Parke on Berkshire, 12" sewer (Jurisdiction Change)	Point of Discharge
5	Wayne County sewer	south of Berkshire on Parke, 12" sewer (Jurisdiction Change)	Point of Discharge
6	Wayne County sewer	east of Parke at Oak River, 12" sewer (Jurisdiction Change)	Point of Discharge
7	Wayne County sewer	south of Country Club on Chicory, 15" sewer (Jurisdiction Change)	Point of Discharge
8	Wayne County sewer	west of Country Club and Calm Meadow Ct, 12" sewer (Jurisdiction Change)	Point of Discharge
9	Wayne County sewer	south side of Chicory, between Calm Meadow and Cloverdale, 12" sewer (Jurisdiction Change)	Point of Discharge
10	Wayne County sewer	southwest corner of Cloverdale Ct, 12" sewer (Jurisdiction Change)	Point of Discharge
11	Wayne County sewer	northeast of Cloverdale on Country Club, 12" sewer (Jurisdiction Change)	Point of Discharge
12	Wayne County sewer	south of Ferry on Country Club, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
13	Wayne County sewer	south of Ferry on Golfpointe, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
14	Wayne County sewer	between Ferry and Shoreline on Golfview, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
15	Wayne County sewer	west of Shoreline and Golfview, 12" sewer (Jurisdiction Change)	Point of Discharge
16	Wayne County sewer	between Fairway and Golfview on Shoreline, 12" sewer (Jurisdiction Change)	Point of Discharge
17	Wayne County sewer	between Ferry and Shoreline on Fairway, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
18	Thorofare Canal	Waterman and Thorofare Canal, 24" sewer	Outfall
19	Wayne County sewer	north of Grays on Rivard Ct, 8" sewer (Jurisdiction Change)	Point of Discharge
20	Wayne County sewer	southwest of Rivard Ct cul-de-sac, 8" sewer (Jurisdiction Change)	Point of Discharge
21	Wayne County sewer	northwest corner of Cadillac Cir, 12" sewer (Jurisdiction Change)	Point of Discharge
22	Wayne County sewer	west of center of Cadillac Cir, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
23	Wayne County sewer	center of Cadillac Cir, 12" sewer (Jurisdiction Change)	Point of Discharge
24	Wayne County sewer	southeast corner of Cadillac Cir, 12" sewer (Jurisdiction Change)	Point of Discharge
25	Wayne County sewer	between Cadillac Cir and Parke on north side of Grays, 15" sewer (Jurisdiction Change)	Point of Discharge
26	Wayne County sewer	south of Prestwick and Marquette, 12" sewer (Jurisdiction Change)	Point of Discharge
27	Wayne County sewer	south of east end of Marquette, 12" sewer (Jurisdiction Change)	Point of Discharge
28	Wayne County sewer	south of west end of La Salle, 12" sewer (Jurisdiction Change)	Point of Discharge
29	Wayne County sewer	between Grays and La Salle on east side of Parke, 12" sewer (Jurisdiction Change)	Point of Discharge
30	Wayne County sewer	north of Grays on east side of Parke, 12" sewer (Jurisdiction Change)	Point of Discharge
31	Wayne County sewer	east of Parke on north side of Macomb, 12" sewer (Jurisdiction Change)	Point of Discharge
32	Wayne County sewer	between Mathias and Grosse Ile Pkwy on Parke, 8" sewer, both sides (Jurisdiction Change)	Point of Discharge
33	Wayne County sewer	north of Grosse Ile Pkwy on Parke, 8" sewer, both sides (Jurisdiction Change)	Point of Discharge
34	Wayne County sewer	northwest of Grosse Ile Pkwy and Parke, 8" sewer (Jurisdiction Change)	Point of Discharge
35	Wayne County sewer	east of Parke on north side of Grosse Ile Pkwy, 8" sewer (Jurisdiction Change)	Point of Discharge
36	Wayne County sewer	north side of Grosse Ile Pkwy at Spur, 8" sewer (Jurisdiction Change)	Point of Discharge
37	Wayne County sewer	between Hazelnut and Sunnybrook on Woodside, 12" sewer (Jurisdiction Change)	Point of Discharge
38	Wayne County sewer	north end of Hazelnut Ct, 8" sewer (Jurisdiction Change)	Point of Discharge
39	Wayne County sewer	between Hazelnut and Parke on Woodside, 12" sewer (Jurisdiction Change)	Point of Discharge
40	Wayne County sewer	between Woodside and Bellevue on Parke, 12" sewer, both sides (Jurisdiction Change)	Point of Discharge
41	Detroit River	east of East River at Bellevue, 48" sewer	Outfall
42	Wayne County sewer	between Thorpe and Parke on Manchester, 12" sewer (Jurisdiction Change)	Point of Discharge
43	Wayne County sewer	between Yorkshire and Cheshire on Manchester, 12" sewer (Jurisdiction Change)	Point of Discharge
44	Wayne County sewer	between Lancashire and Yorkshire on Manchester, 12" sewer (Jurisdiction Change)	Point of Discharge
45	Wayne County sewer	between Waterbury and Lancashire on Manchester, 12" sewer (Jurisdiction Change)	Point of Discharge
46	Wayne County sewer	between Meridian and Waterbury on Manchester, 12" sewer (Jurisdiction Change)	Point of Discharge
47	Wayne County sewer	south of Lake at Meridian, 24"x38" sewer (Jurisdiction Change)	Point of Discharge
48	Frenchman's Creek	northwest of Reo at Frenchman's Creek, 30" sewer	Outfall
49	Frenchman's Creek	south of Reo at Frenchman's Creek, 36" sewer	Outfall

50	Frenchman's Creek	east of Stinson and Johnson, 30" sewer	Outfall
51	Frenchman's Creek	Gloccamorra and Frenchman's Creek, 27" sewer	Outfall
52	Trenton Channel	N42˚ 10' 23.2" , W083˚ 09' 23.5", 24" RCP	Outfall
53	Thorofare Canal	N42˚ 09' 23.0" , W083˚ 09' 01.9" , 24"RCP	Outfall
54A	Thorofare Canal	N42˚ 09' 05.8" , W083˚ 09' 08.8" , 36"RCP	Outfall
54B	Thorofare Canal	Church Rd Open Ditch to Thorofare Canal	Outfall
55	Trenton Channel	N42˚ 08' 37.0" , W083˚ 10' 09.9" , 24"RCP	Outfall
56	Detroit River	N42˚ 08' 37.4" , W083˚ 08' 20.3" , 12"RCP	Outfall
57	Detroit River	N42˚ 07' 52.5" , W083˚ 08' 18.2" , 18" Steel	Outfall
58A	Detroit River	N42˚ 07' 48.0" , W083˚ 08' 20.2" , 60" RCP	Outfall
58B	Detroit River	N42˚ 07' 47.77" , W083˚ 08' 20.2" , 18" RCP	Outfall
59	Trenton Channel	N42˚ 08' 09.4" , W083˚ 10' 13.4" , 12" RCP	Outfall
60	Trenton Channel	N42˚ 06' 47.3" , W083˚ 10' 26.9" , 12" RCP	Outfall
61	Frenchman's Creek	N42˚ 06' 28.5" , W083˚ 10' 15.0" , 60" RCP	Outfall
62	Trenton Channel	N42˚ 05' 38.8" , W083˚ 10' 22.9" , 36" RCP	Outfall
63A	Detroit River	N42˚ 06' 30.4" , W083˚ 08' 58.7" , 36" CMP	Outfall
63B	Detroit River	N42˚ 06' 29.6" , W083˚ 08' 58.7" , 36" RCP	Outfall
63C	Detroit River	N42˚ 06' 30.2" , W083˚ 08' 58.8" , 12" CMP	Outfall
63D	Detroit River	N42˚ 06' 29.8" , W083˚ 08' 58.9" , 18" RCP	Outfall
64	Thorofare Canal	northwest of Ferry Road Bridge, 12" RCP	Outfall
65	Thorofare Canal	Grosse Ile WWTP road, 24" RCP	Outfall
66	Thorofare Canal	Grosse Ile WWTP road, 12" RCP	Outfall
67	Thorofare Canal	Grosse Ile WWTP road, 12" RCP	Outfall
68	Thorofare Canal	Grosse Ile WWTP road, 10" PVC	Outfall
69	Trenton Channel	West River GI PKY Ramp, 12" RCP	Outfall
70	Trenton Channel	West River GI PKY Ramp, 12" RCP	Outfall
71	Trenton Channel	West River Rd and Marlborough Rd, 18" RCP	Outfall
S1	Jurisdiction Change	N42˚ 06' 52.6" , W83˚ 09' 47.0", 18" RCP (Jurisdiction Change) Grosse Ile Meridian School	Point of Discharge
S2	Jurisdiction Change	N42˚ 07' 56.1" , W83˚ 08' 50.7", 18" RCP (Jurisdiction Change) Grosse Ile School Bus Garage	Point of Discharge
S3	Jurisdiction Change	N42˚ 07' 54.7" , W83˚ 08' 50.1", 12" RCP (Jurisdiction Change) Grosse Ile School Bus Garage	Point of Discharge
S4	Jurisdiction Change	N42˚ 07' 53.5" , W83˚ 08' 50.7", 12" RCP (Jurisdiction Change) Grosse Ile School Bus Garage	Point of Discharge
S5	Jurisdiction Change	N42˚ 07' 52.9" , W83˚ 08' 35.8", 12" RCP (Jurisdiction Change) Grosse Ile High School Bus Loop outfall to Lyons Rd Stm System	Point of Discharge
S6	Jurisdiction Change	N42˚ 08' 7.4" , W83˚ 08' 18.3" Bio Retention Grosse Ile Middle School	Outfall
S7	Jurisdiction Change	N42˚ 07' 0.5" , W83˚ 08' 34.9", 15" RCP (Jurisdiction Change) Parke Lane Elementary School Underground detention outfall	Point of Discharge
S8	Jurisdiction Change	N42˚ 07' 56.5" , W83˚ 08' 35.7", 12" RCP (Jurisdiction Change) Parke Lane Elementary School outfall from Bio Filter	Point of Discharge

Appendix B

STANDARD OPERATING PROCEDURE
ENFORCEMENT RESPONSE

PREPARED FOR:

THE Township OF Grosse Ile
9601 Groh Road, Grosse Ile, MICHIGAN 48138

APRIL 2017

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer (MS4) Phase II Stormwater Discharge Permit Application requires a procedure for Enforcement Response to address violations of the ordinances or regulatory mechanisms identified in the Stormwater Management Plan.

SECTION B –PENALTY

Township of Grosse Ile Code of Ordinances 11-02 Chapter 133: Illicit Discharges Section 133-12 – Violations, enforcement, and penalties thru Section 133-317 – Remedies not exclusive and Township of Grosse Ile, Code Of Ordinances Chapter 1- General Provisions Article I: Section 1-3 – General penalty, define the procedural rules and penalties levied by the Township for ordinance violations. The sections specifically define penalties for misdemeanors or civil infractions and continuing violations.

B.1 Sec. 1-3. - General penalty.

(A) "Unless another penalty is expressly provided in this Code or in any amendment thereof, a person convicted of a violation of any section or chapter or provision of this Code or convicted of the commission of any act declared to be a misdemeanor or an offense by this Code shall be punished by a fine which shall not exceed the sum of $500 or by imprisonment for not more than 90 days, or by both such fine and imprisonment. Each act of violation and every day upon which such violation shall occur or continue shall constitute a separate offense.

B. This Code may also be enforced by suit for injunction, action for damages, or by or through any other legal process appropriate to the enforcement thereof"

[Adopted 8-11-1980 by Ord. No. 137 as Ch. 1 of the Grosse Ile Township Code]

B.2 Sec. 133-12. - Violations, enforcement, and penalties.

A. "Violations.

(1) It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this chapter. Any person who has violated or continues to violate the provisions of this chapter may be subject to the enforcement actions outlined in this section or may be restrained by injunction or otherwise abated in a manner provided by law.

(2) In the event the violation constitutes an immediate danger to public health or public safety, Grosse Ile Township and/or the MDEQ is authorized to enter upon the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property. Grosse Ile Township and/or the MDEQ is authorized to seek costs of the abatement as outlined in § 133-15.

B. Warning notice. When Grosse Ile Township and/or the MDEQ finds that any person has violated, or continues to violate, any provision of this chapter or any order issued hereunder, Grosse Ile Township and/or the MDEQ may serve upon that person a written warning notice, specifying the particular violation believed to have occurred and requesting the discharger to immediately investigate the matter and to seek a resolution whereby any offending discharge will cease. Investigation and/or resolution of the matter in response to the warning notice in no way relieves the alleged violator

of liability for any violations occurring before or after receipt of the warning notice. Nothing in this subsection shall limit the authority of Grosse Ile Township and/or the MDEQ to take any action, including emergency action or any other enforcement action, without first issuing a warning notice.

C. Notice of violation. Whenever Grosse Ile Township and/or the MDEQ finds that a person has violated a prohibition or failed to meet a requirement of this chapter, Grosse Ile Township and/or the MDEQ may order compliance by written notice of violation to the responsible person.

(1) The notice of violation shall contain:

(a) The name and address of the alleged violator;

(b) The address, when available, or a description of the building, structure or land upon which the violation is occurring, or has occurred;

(c) A statement specifying the nature of the violation;

(d) A description of the remedial measures necessary to restore compliance with this chapter and a time schedule for the completion of such remedial action;

(e) A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed;

(f) A statement that the determination of violation may be appealed to Grosse Ile Township and/or the MDEQ by filing a written notice of appeal within five days of service of notice of violation; and

(g) A statement specifying that should the violator fail to restore compliance within the established time schedule, the work will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

(2) Such notice may require without limitation:

(a) The performance of monitoring, analyses, and reporting;

(b) The elimination of illicit connections or discharges;

(c) That violating discharges, practices, or operations shall cease and desist;

(d) The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;

(e) Payment of a fine to cover administrative and remediation costs; and

(f) The implementation of source control or treatment BMPs.

D. Compensatory action. In lieu of enforcement proceedings, penalties, and remedies authorized by this chapter, Grosse Ile Township and/or the MDEQ may impose upon a violator alternative compensatory actions, such as storm drain stenciling, attendance at compliance workshops, creek cleanup, etc.

E. Emergency cease and desist orders; suspensions.

(1) Emergency cease and desist orders.

(a) When Grosse Ile Township and/or the MDEQ finds that any person has violated, or continues to violate, any provision of this chapter, or any

order issued hereunder, or that the person's past violations are likely to recur, and that the person's violation(s) has (have) caused or contributed to an actual or threatened discharge to the MS4 or waters of the United States which reasonably appears to present an imminent or substantial endangerment to the health or welfare of persons or to the environment, Grosse Ile Township and/or the MDEQ may issue an order to the violator directing it immediately to cease and desist all such violations and directing the violator to:

[1] Immediately comply with all chapter requirements; and

[2] Take such appropriate preventive action as may be needed to properly address a continuing or threatened violation, including immediately halting operations and/or terminating the discharge.

(b) Any person notified of an emergency order directed to it under this subsection shall immediately comply and stop or eliminate its endangering discharge. In the event of a discharger's failure to immediately comply voluntarily with the emergency order, Grosse Ile Township and/or the MDEQ may take such steps as deemed necessary to prevent or minimize harm to the MS4 or waters of the United States, and/or endangerment to persons or to the environment, including immediate termination of a facility's water supply, sewer connection, or other municipal utility services. Grosse Ile Township and/or the MDEQ may allow the person to recommence its discharge when it has demonstrated to the satisfaction of Grosse Ile Township and/or the MDEQ that the period of endangerment has passed, unless further termination proceedings are initiated against the discharger under this chapter. A person that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the causes of the harmful discharge and the measures taken to prevent any future occurrence, to Grosse Ile Township and/or the MDEQ within three days of receipt of the emergency order. Issuance of an emergency cease and desist order shall not be a bar against, or a prerequisite for, taking any other action against the violator.

(2) Suspension due to illicit discharges in emergency situations. Grosse Ile Township and/or the MDEQ may, without prior notice, suspend MS4 discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the MS4 or waters of the United States. If the violator fails to comply with a suspension order issued in an emergency, Grosse Ile Township and/or the MDEQ may take such steps as deemed necessary to prevent or minimize damage to the MS4 or waters of the United States, or to minimize danger to persons.

(3) Suspension due to the detection of illicit discharge.

(a) Any person discharging to the MS4 in violation of this chapter may have his/her MS4 access terminated if such termination would abate or reduce an illicit discharge. Grosse Ile Township and/or the MDEQ will

notify a violator of the proposed termination of its MS4 access. The violator may petition Grosse Ile Township and/or the MDEQ for a reconsideration and hearing.

(b) A person commits an offense if the person reinstates MS4 access to premises terminated pursuant to this section, without the prior approval of Grosse Ile Township and/or the MDEQ.

F. Civil penalties. In the event a person violates any provision of this chapter, such a violation constitutes a municipal civil infraction which may be punishable by a fine of up to $500 per violation. In addition to any fine and costs imposed under this chapter, the court may assess the additional costs incurred in compelling enforcement of the chapter. Each day that the violation takes place constitutes a separate offense under this chapter. If any person commits a second offense or subsequent violation of any provision of this chapter, such a violation, in the discretion of the Township, may be charged as a misdemeanor punishable by a fine not exceeding $500 and/or imprisonment not exceeding 90 days, provided that the authorized Township official issues an appearance ticket and marks it as a misdemeanor. However, nothing herein requires the Township official to charge a repeat offense of the same ordinance by the same individual as a misdemeanor"

[Adopted by the Township Board of the Township of Grosse Ile 3-28-2011 by Ord. No. 11-02. Amendments noted where applicable.]

B.3 Section 133-17 Remedies not exclusive.

"A. The remedies listed in this chapter are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of Grosse Ile Township and/or the MDEQ to seek cumulative remedies.

B. Grosse Ile Township and/or the MDEQ may recover all attorneys' fees, court costs and other expenses associated with enforcement of this chapter, including sampling and monitoring expenses."

[Adopted by the Township Board of the Township of Grosse Ile 3-28-2011 by Ord. No. 11-02. Amendments noted where applicable.]

SECTION C – ENFORCEMENT TRACKING

The Township will track all violations and issued permits. The following information will be collected, stored in hard copy form with DPS Director, and used for tracking records for each violation that is imposed by the Township.

1. Name
2. Date
3. Location of the Violation (address, cross streets, etc.)
4. Business, Agency, Organization as applicable
5. Description of the Violation
6. Applicable Correspondence
7. Follow-up Actions
8. Key Dates
9. Descriptions of the Township's Enforcement Response
10. Schedules for Achieving Compliance
11. Date the Violation was Resolved

SECTION D – PROCESS FOR REVISION

Any questions on this policy and procedure should be directed to the Stormwater Manager or the Department of Public Services Manager. This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

Township of Grosse Ile, MI
Friday, March 10, 2017

Chapter 133. ILLICIT DISCHARGES

[HISTORY: Adopted by the Township Board of the Township of Grosse Ile 3-28-2011 by Ord. No. 11-02. Amendments noted where applicable.]

GENERAL REFERENCES
Flood control — See Ch. **116**.
Sewage disposal systems — See Ch. **209**.
Sewer use — See Ch. **210**.
Stormwater management — See Ch. **233**.
Wetlands and drainageways — See Ch. **275**.

§ 133-1. Purpose; objectives.

A. The purpose of this chapter is to provide for the health, safety, and general welfare of the citizens of Grosse Ile Township through the regulation of non-stormwater discharges to the storm drainage system to the maximum extent practicable as required by federal and state law. This chapter establishes methods for controlling the introduction of pollutants into the municipal separate storm sewer system (MS4) in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process.

B. The objectives of this chapter are to:

(1) Regulate the contribution of pollutants to the MS4 by stormwater discharges by any user.

(2) Prohibit illicit connections and discharges to the MS4.

(3) Establish legal authority to carry out inspection, surveillance, monitoring, and enforcement procedures necessary for this chapter.

§ 133-2. Definitions.

For the purposes of this chapter, the following shall mean:

BEST MANAGEMENT PRACTICES (BMPs)
Schedules of activities, prohibitions of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or stormwater conveyance systems. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

CLEAN WATER ACT
The Federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.), and any subsequent amendments thereto.

GROSSE ILE TOWNSHIP and/or MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY (MDEQ)
Employees or designees of the municipality or agency designated to enforce this chapter or the regulations herein.

HAZARDOUS MATERIALS

Any material, including any substance, waste, or combination thereof which, because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

ILLEGAL DISCHARGE

Any direct or indirect non-stormwater discharge to the storm drain system, except as exempted in § **133-7** of this chapter.

ILLICIT CONNECTIONS

Either of the following:

A. Any drain or conveyance, whether on the surface or subsurface that allows an illegal discharge to enter the storm drain system, including but not limited to any conveyances that allow any non-stormwater discharge including sewage, process wastewater, and wash water to enter the storm drain system and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by an authorized enforcement agency; or

B. Any drain or conveyance connected from a commercial or industrial land use to the storm drain system that has not been documented in plans, maps, or equivalent records and approved by an authorized enforcement agency.

INDUSTRIAL ACTIVITY

Activities subject to NPDES industrial stormwater permits as defined in 40 CFR, Section 122.26(b)(14).

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

The system of conveyances (including sidewalks, roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned and operated by the Township of Grosse Ile and designed or used for collecting or conveying stormwater, and that is not used for collecting or conveying sewage.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) STORMWATER DISCHARGE PERMIT

A permit issued by the EPA [or by a state under authority delegated pursuant to 33 USC § 1342(b)] that authorizes the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

NON-STORMWATER DISCHARGE

Any discharge to the storm drain system that is not composed entirely of stormwater and that exceeds the established state or federal limits.

PERSON

Any individual, association, organization, partnership, firm, corporation or other entity recognized by law and acting as either the owner or as the owner's agent.

POLLUTANT

Anything which causes or contributes to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; non-hazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations, so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous substances and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.

PREMISES

Any building, lot, parcel of land, or portion of land, whether improved or unimproved, including adjacent sidewalks and parking strips.

STORM DRAINAGE SYSTEM

Publicly owned facilities by which stormwater is collected and/or conveyed, including but not limited to any roads with drainage systems, municipal streets, gutters, curbs, inlets, piped storm drains, pumping facilities, retention and detention basins, natural and human-made or altered drainage channels, reservoirs, and other drainage structures.

STORMWATER

Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

STORMWATER MANAGEMENT PLAN

A document which describes the best management practices and activities to be implemented by a person or business to identify sources of pollution or contamination at a site and the actions to eliminate or reduce pollutant discharges to stormwater, stormwater conveyance systems, and/or receiving waters to the maximum extent practicable.

WASTEWATER

Any water or other liquid, other than uncontaminated stormwater, discharged from a facility.

§ 133-3. Applicability.

This chapter shall apply to all water entering the storm drain system generated on any developed and undeveloped lands unless explicitly exempted by Grosse Ile Township and/or the Michigan Department of Environmental Quality (MDEQ).

§ 133-4. Responsibility for administration.

Grosse Ile Township and/or the MDEQ shall administer, implement, and enforce the provisions of this chapter. Any powers granted or duties imposed upon Grosse Ile Township and/or the MDEQ may be delegated in writing by the Director of Grosse Ile Township and/or the MDEQ to persons or entities acting in the beneficial interest of or in the employ of the agency.

§ 133-5. Effect on other laws.

This chapter is not intended to modify or repeal any other ordinance, rule, regulation, or other provision of law. The requirements of this chapter are in addition to the requirements of any other ordinance, rule, regulation, or other provision of law, and where any provision of this chapter imposes restrictions different from those imposed by any other ordinance, rule, regulation, or other provision of law, whichever provision is more restrictive or imposes higher protective standards for human health or the environment shall control.

§ 133-6. Minimum standards.

The standards set forth herein and promulgated pursuant to this chapter are minimum standards; therefore this chapter does not intend or imply that compliance by any person will ensure that there will be no contamination, pollution, or unauthorized discharge of pollutants.

§ 133-7. Discharge prohibitions.

A. Prohibition of illegal discharges.

(1) No person shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw,

drain, or otherwise discharge into the MS4 any pollutants or waters containing any pollutants, other than stormwater.

(2) The commencement, conduct or continuance of any illegal discharge to the storm drain system is prohibited except as described as follows:

(a) The following discharges are exempt from discharge prohibitions established by this chapter: water line flushing, landscape irrigation, diverted stream flows, rising groundwaters, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air-conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water.

(b) Discharges or flow from firefighting, and other discharges specified in writing by Grosse Ile Township and/or the MDEQ as being necessary to protect public health and safety.

(c) Discharges associated with dye testing, however this activity requires a verbal notification to Grosse Ile Township and/or the MDEQ prior to the time of the test.

(d) The prohibition shall not apply to any non-stormwater discharge permitted under an NPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the United States Environmental Protection Agency (EPA), provided that the discharger is in full compliance with all requirements of the permit, waiver or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the storm drain system.

B. Prohibition of illegal connections.

(1) The construction, use, maintenance or continued existence of illicit connections to the storm drain is prohibited.

(2) This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of the connection.

(3) A person is considered to be in violation of this chapter if the person connects a line conveying sewage to the MS4, or allows such a connection to continue.

(4) Improper connections in violation of this chapter must be disconnected and redirected, if necessary, to an approved on-site wastewater management system or sanitary sewer system upon approval of Grosse Ile Township and/or the MDEQ.

(5) Any drain or conveyance that has not been documented in plans, maps or equivalent, and which may be connected to the storm sewer system, shall be located by the owner or occupant of that property upon receipt of written notice of violation from Grosse Ile Township and/or the MDEQ requiring that such locating be completed. Such notice will specify a reasonable time period within which the location of the drain or conveyance is to be determined, that the drain or conveyance be identified as storm sewer, sanitary sewer, or other, and that the outfall location or point of connection to the storm sewer system, sanitary sewer system or other discharge point be identified. Results of these investigations are to be documented and provided to Grosse Ile Township and/or the MDEQ.

§ 133-8. Watercourse protection.

Every person owning property through which a watercourse passes, or such person's lessee, shall keep and maintain that part of the watercourse within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse. In addition, the owner or lessee shall maintain existing privately owned structures within or adjacent to a

watercourse so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse.

§ 133-9. Compliance monitoring.

A. Right of entry; inspection and sampling. Grosse Ile Township and/or the MDEQ shall be permitted to enter and inspect facilities subject to regulation under this chapter as often as may be necessary to determine compliance with this chapter.

(1) If a discharger has security measures in force which require proper identification and clearance before entry into its premises, the discharger shall make the necessary arrangements to allow access to representatives of Grosse Ile Township and/or the MDEQ.

(2) Facility operators shall allow Grosse Ile Township and/or the MDEQ ready access to all parts of the premises for the purposes of inspection, sampling, examination and copying of records that must be kept under the conditions of an NPDES permit to discharge stormwater, and the performance of any additional duties as defined by state and federal law.

(3) Grosse Ile Township and/or the MDEQ shall have the right to set up on any permitted facility such devices as are necessary in the opinion of Grosse Ile Township and/or the MDEQ to conduct monitoring and/or sampling of the facility's stormwater discharge.

(4) Grosse Ile Township and/or the MDEQ has the right to require the discharger to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the discharger at its own expense. All devices used to measure stormwater flow and quality shall be calibrated to ensure their accuracy.

(5) Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the operator at the written or oral request of Grosse Ile Township and/or the MDEQ and shall not be replaced. The costs of clearing such access shall be borne by the operator.

(6) Unreasonable delays in allowing Grosse Ile Township and/or the MDEQ access to a permitted facility is a violation of a stormwater discharge permit and of this chapter. A person who is the operator of a facility with an NPDES permit to discharge stormwater associated with industrial activity commits an offense if the person denies Grosse Ile Township and/or the MDEQ reasonable access to the permitted facility for the purpose of conducting any activity authorized or required by this chapter.

B. Search warrants. If Grosse Ile Township and/or the MDEQ has been refused access to any part of the premises from which stormwater is discharged, and he/she is able to demonstrate probable cause to believe that there may be a violation of this chapter, or that there is a need to inspect and/or sample as part of a routine inspection and sampling program designed to verify compliance with this chapter or any order issued hereunder, or to protect the overall public health, safety, and welfare of the community, then Grosse Ile Township and/or the MDEQ may seek issuance of a search warrant from any court of competent jurisdiction.

§ 133-10. Requirement to use best management practices.

Any person responsible for a property or premises that is, or may be, the source of an illicit discharge, may be required to implement, at said person's expense, additional structural and nonstructural BMPs to prevent the further discharge of pollutants to the MS4. Compliance with all terms and conditions of a valid NPDES permit authorizing the discharge of stormwater associated with industrial activity, to the extent practicable, shall be deemed compliance with the provisions of this section.

§ 133-11. Notification of spills.

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into stormwater, the storm drain system, or waters of the United States, said person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials, said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of nonhazardous materials, said person shall notify Grosse Ile Township and/or the MDEQ in person or by phone or facsimile no later than the next business day. Notifications in person or by phone shall be confirmed by written notice addressed and mailed to Grosse Ile Township and/or the MDEQ within three business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least seven years. Failure to provide notification of a release as provided above is a violation of this chapter.

§ 133-12. Violations, enforcement and penalties.

A. Violations.

(1) It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this chapter. Any person who has violated or continues to violate the provisions of this chapter may be subject to the enforcement actions outlined in this section or may be restrained by injunction or otherwise abated in a manner provided by law.

(2) In the event the violation constitutes an immediate danger to public health or public safety, Grosse Ile Township and/or the MDEQ is authorized to enter upon the subject private property, without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property. Grosse Ile Township and/or the MDEQ is authorized to seek costs of the abatement as outlined in § **133-15**.

B. Warning notice. When Grosse Ile Township and/or the MDEQ finds that any person has violated, or continues to violate, any provision of this chapter or any order issued hereunder, Grosse Ile Township and/or the MDEQ may serve upon that person a written warning notice, specifying the particular violation believed to have occurred and requesting the discharger to immediately investigate the matter and to seek a resolution whereby any offending discharge will cease. Investigation and/or resolution of the matter in response to the warning notice in no way relieves the alleged violator of liability for any violations occurring before or after receipt of the warning notice. Nothing in this subsection shall limit the authority of Grosse Ile Township and/or the MDEQ to take any action, including emergency action or any other enforcement action, without first issuing a warning notice.

C. Notice of violation. Whenever Grosse Ile Township and/or the MDEQ finds that a person has violated a prohibition or failed to meet a requirement of this chapter, Grosse Ile Township and/or the MDEQ may order compliance by written notice of violation to the responsible person.

(1) The notice of violation shall contain:

(a) The name and address of the alleged violator;

(b) The address, when available, or a description of the building, structure or land upon which the violation is occurring, or has occurred;

(c) A statement specifying the nature of the violation;

(d) A description of the remedial measures necessary to restore compliance with this chapter and a time schedule for the completion of such remedial action;

(e) A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed;

(f) A statement that the determination of violation may be appealed to Grosse Ile Township and/or the MDEQ by filing a written notice of appeal within five days of service of notice of violation; and

(g) A statement specifying that should the violator fail to restore compliance within the established time schedule, the work will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

(2) Such notice may require without limitation:

(a) The performance of monitoring, analyses, and reporting;

(b) The elimination of illicit connections or discharges;

(c) That violating discharges, practices, or operations shall cease and desist;

(d) The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;

(e) Payment of a fine to cover administrative and remediation costs; and

(f) The implementation of source control or treatment BMPs.

D. Compensatory action. In lieu of enforcement proceedings, penalties, and remedies authorized by this chapter, Grosse Ile Township and/or the MDEQ may impose upon a violator alternative compensatory actions, such as storm drain stenciling, attendance at compliance workshops, creek cleanup, etc.

E. Emergency cease and desist orders; suspensions.

(1) Emergency cease and desist orders.

(a) When Grosse Ile Township and/or the MDEQ finds that any person has violated, or continues to violate, any provision of this chapter, or any order issued hereunder, or that the person's past violations are likely to recur, and that the person's violation(s) has (have) caused or contributed to an actual or threatened discharge to the MS4 or waters of the United States which reasonably appears to present an imminent or substantial endangerment to the health or welfare of persons or to the environment, Grosse Ile Township and/or the MDEQ may issue an order to the violator directing it immediately to cease and desist all such violations and directing the violator to:

[1] Immediately comply with all chapter requirements; and

[2] Take such appropriate preventive action as may be needed to properly address a continuing or threatened violation, including immediately halting operations and/or terminating the discharge.

(b) Any person notified of an emergency order directed to it under this subsection shall immediately comply and stop or eliminate its endangering discharge. In the event of a discharger's failure to immediately comply voluntarily with the emergency order, Grosse Ile Township and/or the MDEQ may take such steps as deemed necessary to prevent or minimize harm to the MS4 or waters of the United States, and/or endangerment to persons or to the environment, including immediate termination of a facility's water supply, sewer connection, or other municipal utility services. Grosse Ile Township and/or the MDEQ may allow the person to recommence its discharge when it has demonstrated to the satisfaction of Grosse Ile Township and/or the MDEQ that the period of endangerment has passed, unless further termination proceedings are initiated against the discharger under this chapter. A person that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the causes of the harmful discharge and the measures taken to prevent any future occurrence, to Grosse Ile Township and/or the MDEQ within three days of receipt of the emergency order. Issuance of an emergency cease and desist order shall not be a bar against, or a prerequisite for, taking any other action against the violator.

(2) Suspension due to illicit discharges in emergency situations. Grosse Ile Township and/or the MDEQ

may, without prior notice, suspend MS4 discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the MS4 or waters of the United States. If the violator fails to comply with a suspension order issued in an emergency, Grosse Ile Township and/or the MDEQ may take such steps as deemed necessary to prevent or minimize damage to the MS4 or waters of the United States, or to minimize danger to persons.

(3) Suspension due to the detection of illicit discharge.

(a) Any person discharging to the MS4 in violation of this chapter may have his/her MS4 access terminated if such termination would abate or reduce an illicit discharge. Grosse Ile Township and/or the MDEQ will notify a violator of the proposed termination of its MS4 access. The violator may petition Grosse Ile Township and/or the MDEQ for a reconsideration and hearing.

(b) A person commits an offense if the person reinstates MS4 access to premises terminated pursuant to this section, without the prior approval of Grosse Ile Township and/or the MDEQ.

F. Civil penalties. In the event a person violates any provision of this chapter, such a violation constitutes a municipal civil infraction which may be punishable by a fine of up to $500 per violation. In addition to any fine and costs imposed under this chapter, the court may assess the additional costs incurred in compelling enforcement of the chapter. Each day that the violation takes place constitutes a separate offense under this chapter. If any person commits a second offense or subsequent violation of any provision of this chapter, such a violation, in the discretion of the Township, may be charged as a misdemeanor punishable by a fine not exceeding $500 and/or imprisonment not exceeding 90 days, provided that the authorized Township official issues an appearance ticket and marks it as a misdemeanor. However, nothing herein requires the Township official to charge a repeat offense of the same ordinance by the same individual as a misdemeanor.

§ 133-13. Appeal of notice of violation.

Any person receiving a notice of violation may appeal the determination of Grosse Ile Township and/or the MDEQ. The notice of appeal must be received within five days from the date of the notice of violation. Hearing on the appeal before the appropriate authority or his/her designee shall take place within 10 days from the date of receipt of the notice of appeal. The decision of the municipal authority or its designee shall be final.

§ 133-14. Failure to comply.

If the violation has not been corrected pursuant to the requirements set forth in the notice of violation or, in the event of an appeal, within five days of the decision of the municipal authority upholding the decision of Grosse Ile Township and/or the MDEQ, then representatives of Grosse Ile Township and/or the MDEQ shall enter upon the subject private property and are authorized to take any and all measures necessary to abate the violation and/or restore the property. It shall be unlawful for any person, owner, agent or person in possession of any premises to refuse to allow the government agency or designated contractor to enter upon the premises for the purposes set forth above.

§ 133-15. Cost of abatement.

Within 30 days after abatement of the violation, the owner of the property will be notified of the cost of abatement, including administrative costs. The property owner may file a written protest objecting to the amount of the assessment within five days. If the amount due is not paid within a timely manner as determined by the decision of the municipal authority or by the expiration of the time in which to file an appeal, the charges shall become a special assessment against the property and shall constitute a lien on the property for the amount of the assessment.

§ 133-16. Violations deemed public nuisance.

In addition to the enforcement processes and penalties provided, any condition caused or permitted to exist in violation of any of the provisions of this chapter is a threat to public health, safety, and welfare, and is declared and deemed a nuisance, and may be summarily abated or restored at the violator's expense, and/or a civil action to abate, enjoin, or otherwise compel the cessation of such nuisance may be taken.

§ 133-17. Remedies not exclusive.

A. The remedies listed in this chapter are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of Grosse Ile Township and/or the MDEQ to seek cumulative remedies.

B. Grosse Ile Township and/or the MDEQ may recover all attorneys' fees, court costs and other expenses associated with enforcement of this chapter, including sampling and monitoring expenses.

Township of Grosse Ile, MI
Friday, March 10, 2017

Chapter 1. GENERAL PROVISIONS

Article I. Definitions; Construction; General Penalty

§ 1-3. General penalty.

A. Unless another penalty is expressly provided in this Code or in any amendment thereof, a person convicted of a violation of any section or chapter or provision of this Code or convicted of the commission of any act declared to be a misdemeanor or an offense by this Code shall be punished by a fine which shall not exceed the sum of $500 or by imprisonment for not more than 90 days, or by both such fine and imprisonment. Each act of violation and every day upon which such violation shall occur or continue shall constitute a separate offense.

B. This Code may also be enforced by suit for injunction, action for damages, or by or through any other legal process appropriate to the enforcement thereof.

Appendix C

Public Participation Program for the Alliance of Downriver Watersheds MS4s

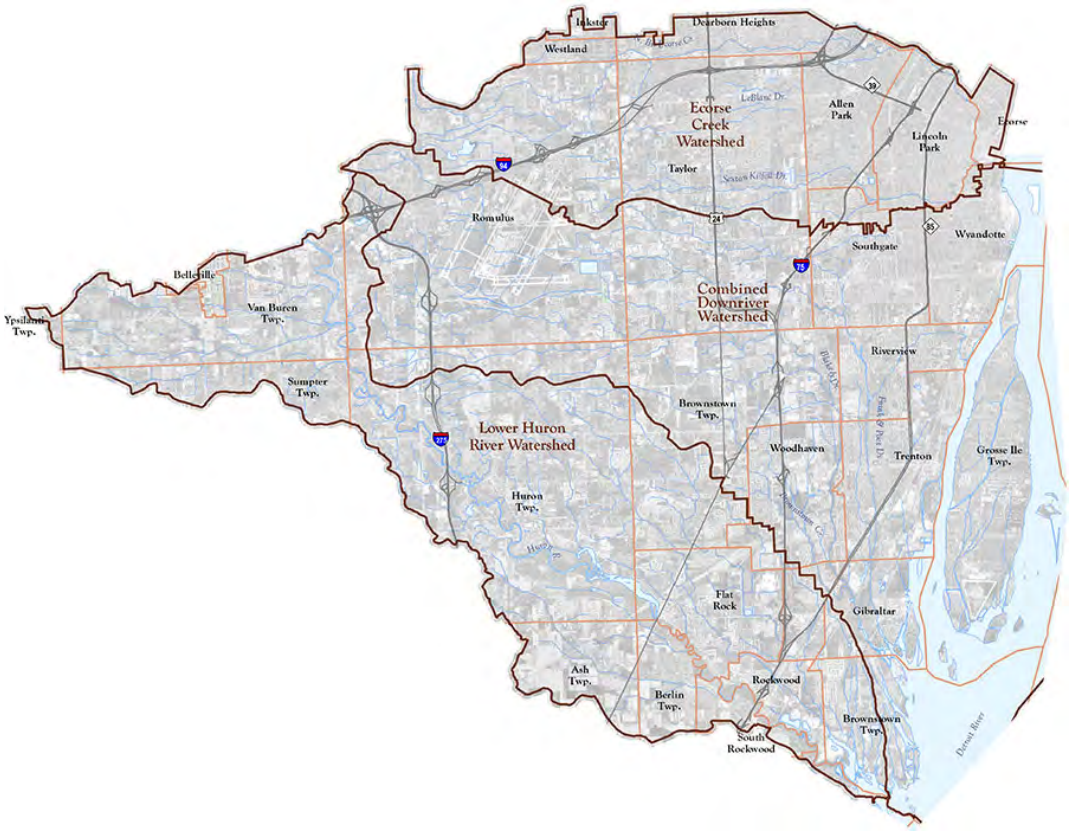
The Public Participation/Involvement Program (PPP) is required by the State of Michigan National Pollutant Discharge Elimination System (NPDES) Permit Application for Discharge of Stormwater to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4).

The purpose of this PPP is to facilitate the involvement of MS4s in the watershed, and the general public in the revision of MS4 Stormwater Management Plans (SWMPs). This PPP is designed to involve all entities in the watersheds identified below with the authority, ability, and desire to carry out the implementation of SWMPs in seeking comment on and implementing those plans.

I. GENERAL INFORMATION

The Alliance of Downriver Watersheds (ADW) is a permanent watershed organization in southeast Michigan and formed under Public Act 517 of the Public Laws of 2004. The ADW was formally established in 2007 but its members have been working together for many years to manage the area's water resources. The ADW consists of 23 public agencies in the Ecorse Creek, Combined Downriver, and Lower Huron River Watersheds within Wayne and Monroe Counties. ADW collaborative efforts include long-term water quality monitoring, stormwater permit compliance and reporting to the State, submittal of grant applications for water quality improvements, and public education.

The ADW is urban in nature consisting of 203.3 square miles and more than 450,000 people (2010 census). Major watercourses within the ADW that drain to the Detroit River and Lake Erie include the Ecorse Creek, Sexton Kilfoil Drain, Frank and Poet Drain, Blakely Drain, Brownstown Creek, Huron River, Smith Creek, Silver Creek and Woods Creek. There are three Watershed Management Plans



for the ADW area, approved by the Michigan Department of Environmental Quality in 2012—Ecorse Creek, Combined Downriver and Lower Huron.

This PPP is submitted by the ADW on behalf of the following Phase I and II MS4s within the Ecorse Creek, Combined Downriver and Lower Huron watersheds. Activities will be implemented collaboratively during the permit cycle by the ADW its cooperating partners and these MS4 permittees:

Allen Park
Belleville
Brownstown Township
Dearborn Heights
Ecorse
Flat Rock
Gibraltar
Grosse Ile Township
Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township
Taylor
Van Buren Township
Wayne County
Westland
Woodhaven
Woodhaven-Brownstown School District
Wyandotte

II. COMMUNICATION DURING THE SWMP DEVELOPMENT PROCESS

The practices listed in this section will be used to solicit public participation during the SWMP development process for each MS4. Public input shall be encouraged in all aspects of the stormwater management program. The following minimum actions shall be taken to encourage public input:

1. Each individual MS4 shall follow local public notice requirements, as appropriate, when informing the public that a stormwater management program must be implemented. Copies of the SWMP shall be available for public inspection, and the public shall be notified of when and where it is available.

2. Each individual MS4 shall participate in and cooperate with the ADW by informing it of activities under their SWMPs, providing copies of the SWMPs and pursuing public input on them, and seeking ways to meet general permit requirements through ongoing programs for water resource protection and enhancement, including water quality monitoring.

III. PROCEDURES FOR PUBLIC INSPECTION, COMMENT AND PARTICIPATION IN IMPLEMENTATION AND REVIEW

The following Best Management Practices (BMPs) will be carried out to meet public participation requirements:

BMP 1.1. **Public Notice**
Description: Each individual MS4 will provide electronic copies of draft SWMPs to the ADW to share with the general public. The ADW will notify the public that SWMPs were developed and encourage public input in the revision process. This will be done primarily through posting SWMPs on the ADW website and sending out an electronic notice to ADW public contact lists and individual MS4s posting

SWMPs at their individual MS4 websites. Additionally, other means of communication will be used for announcing progress on SWMP elements and soliciting input. These may include publication in local news media outlets, announcements to local boards, associations, other interested groups, at public meetings or major public events, articles in local newsletters, or posts on web sites and social networking sites. Each MS4 will follow any public notice requirements specific to their local jurisdiction. The same public notice procedure will be used following any major SWMP revision.
Timeline: Notice will be provided upon release of a draft permit.
Evaluation: Publication of notice in news media, impressions on ADW website.
Responsible Parties: Listed MS4s will provide SWMPs and the ADW will notify the public within the ADW area via email distribution and posting to the ADW website. Each MS4 will notify the public in their local jurisdictions.

BMP 1.2 Public Access to SWMPs
Description: The ADW and the MS4s will publish and make available copies of the SWMPs on the ADW website and at each MS4 office.
Timeline: Following review by MDEQ and revision by MS4s, SWMPs will be made available when the draft permit becomes available for public review.
Evaluation: Number of views each of the plans get at website.
Responsible Parties: The ADW and individual MS4s.

BMP 1.3 SWMP Implementation
Description: The ADW is a watershed implementation group that is open to and encourages public participation. This group meets three times a year (on average). Meeting schedules are posted to the ADW web site and via e-mail distribution lists. Meetings of this group will be the primary point of public input into SWMP implementation and for providing feedback to MS4 representatives.
Timeline: On-going; start in year one of permit.
Evaluation: Document MS4 representative and citizen participation in meetings.
Responsible Parties: MS4 representatives, ADW.

BMP 1.4 SWMP Review
Description: Following public notice of the SWMPs, the ADW and MS4s will accept and consider comments from the public and MDEQ. After revising SWMPs, the ADW and MS4s will post revised drafts and accept public comments before each MS4 finalizes their SWMP.
Timeline: Review completed following initial application and prior to permit issuance.
Evaluation: Comments from the general public.
Responsible Parties: ADW and MS4s.

Appendix D

Approved by EGLE May 2019

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE PUBLIC EDUCATION PLAN

For the Alliance of Downriver Watersheds MS4s

Effective upon NPDES Permit issuance for a period of five (5) years.

Allen Park	Inkster	Taylor
Belleville	Lincoln Park	Van Buren Township
	Melvindale	Wayne County
Dearborn Heights	Riverview	Westland
Ecorse	Rockwood	Woodhaven
Flat Rock	Romulus	Woodhaven-Brownstown
Gibraltar	Southgate	School District Wyandotte
Grosse Ile Township	Sumpter Township	

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I. INTRODUCTION

Purpose of Public Education Plan

In accordance with the permit requirements for Federal Phase II Storm Water Regulations, this Public Education Plan (PEP) was prepared to instill within the residents, businesses, and officials of the communities in regulated watersheds a heightened level of awareness of the connection between individual actions and the health of their watershed and water resources. The objective of this plan is to promote, publicize, and facilitate watershed education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water.

Federal Phase II Storm Water Regulations

A 1987 amendment to the Federal Clean Water Act required the U.S. Environmental Protection Agency (EPA) to develop regulations setting forth National Pollutant Discharge Elimination System (NPDES) permit application requirements for storm water discharges from municipal separate storm sewer systems (MS4s). An MS4 is a drainage system that discharges to waters of the State and is owned or operated by a federal, state, county, city, village, township, district, association or other public body of government. Such drainage systems may include roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels.

Phase I of the NPDES regulations went into effect in 1990, which regulated discharges from communities with populations greater than 100,000. The rules for Phase II of the NPDES regulations were issued in 1999, requiring storm water discharge permits for communities with populations under 100,000 that have MS4s in “urbanized areas” as defined by the U.S. Bureau of the Census.

In Michigan the Michigan Department of Environmental Quality (MDEQ) is administering the federal Phase II permitting process.

Required Public Education Plan Elements

The PEP program is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in stormwater to the maximum extent practicable. The plan describes current and proposed best management practices (BMPs) to meet the minimum control measure requirements in a Public Education Plan (PEP).

The PEP may involve watershed or regional partners collaborating to combine or coordinate existing programs for public stewardship of water resources. Permittees shall indicate if they are or will be working collaboratively with watershed or regional partners on any or all activities in the PEP during the permit cycle, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

The PEP is designed to implement a sufficient amount of educational activities to ensure that the targeted audiences are reached with the appropriate messages to the maximum extent practicable. The permittee shall identify applicable topics from the topics listed below, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

Each applicable topic shall be prioritized based on a procedure for assessing high-priority community-wide issues and targeted issues to reduce pollutants in stormwater runoff, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

A. Promote public responsibility and stewardship in the applicant(s) watershed.

B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.

C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.

D. Promote preferred cleaning materials and procedures for car, pavement, and power washing.

E. Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.

F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.

G. Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.

H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.

I. Educate the public on and promote the benefits of green infrastructure and Low Impact Development.

J. Promote methods for managing riparian lands to protect water quality.

K. Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.

For all applicable topics, the PEP shall identify:

1. Target audience.
2. Key message.
3. Delivery mechanism.
4. Year and frequency the BMP will be implemented.
5. Responsible party.

A **measurable goal with a measure of assessment shall be included for each BMP** and as appropriate, a schedule for implementation (months and years), including interim milestones and the frequency of the BMP, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

The PEP shall provide the procedure for evaluating and determining the effectiveness of the overall PEP. The procedure shall include a method for assessing changes in public awareness and behavior resulting

from the implementation of the PEP and the process for modifying the PEP to address ineffective implementation, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

II. COLLABORATION OF WATERSHED PARTNERS

The permittees identified below have elected to meet the PEP requirements by working with each other and other watershed and regional partners to develop, submit, and implement a PEP that includes both collaborative and individual BMPs:

Allen Park
Belleville
Dearborn Heights
Ecorse
Flat Rock
Gibraltar
Grosse Ile Township
Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township
Taylor
Van Buren Township
Wayne County
Westland
Woodhaven
Woodhaven-Brownstown School District
Wyandotte

These permittees are members of the Alliance of Downriver Watersheds (ADW). The ADW is a permanent watershed organization in Southeast Michigan, formed under Public Act 517 of the Public Laws of 2004. Its membership consists of 22 public agencies in the Ecorse Creek, Combined Downriver, and Lower Huron River Watersheds within Wayne and Monroe Counties.

The ADW was formed in 2007 to build on its members' ongoing efforts to work together in managing the area's water resources. The ADW is relatively urban in nature consisting of 203.3 square miles and more than 450,000 people (2010 census). Major watercourses within the ADW that drain to the Detroit River and Lake Erie include Ecorse Creek, Sexton Kilfoil Drain, Frank and Poet Drain, Blakely Drain, Brownstown Creek, Huron River, Silver Creek and Woods Creek.

The consortium of agencies that make up the ADW meet on a regular basis and work together to cooperatively manage the rivers, lakes and streams within the watershed. Examples of ADW efforts include long-term water quality monitoring, stormwater permit compliance and reporting to the State of Michigan, submittal of grant applications for water quality improvements, and public education on items such as rain barrel use, phosphorus fertilizer, and proper pet waste management.

The consortium is governed by adopted bylaws that set forth its composition, duties and responsibilities. The member agencies assess themselves annually or bi-annually based on population and land areas within the watershed to establish an operating budget that they use to work toward water quality improvements.

Member agencies designate a person to represent them and vote at ADW meetings. Members can be a township, city, village, county, public school district, public college or university, or any other local or regional public agency that meets the following criteria:

- Has been issued a state permit for a water discharge into waterways within the three ADW watersheds
- Whose legal jurisdiction incorporates areas wholly or partially within the watershed boundaries
- Whose governing body by resolution, voluntarily adopts the ADW Bylaws

The ADW also includes Cooperating Partners, who are non-profit organizations, businesses, residents, etc., who provide their time, services, expertise and resources toward the common goal of protecting and restoring the watershed. Cooperating Partners are recognized as non-voting members.

III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

The public education topics A-K listed above in Section II were identified in the permit application. These topics are referred to by their corresponding letter in the Public Education BMPs below as well as on the PEP table.

Watershed-Wide Priority Topics

The procedure for identifying high-priority watershed-wide or targeted issues suited for collaborative public education efforts includes:

- A review of Watershed Management Plans for the Ecorse Creek, Combined Downriver and Lower Huron River watersheds including any established Total Maximum Daily Loads for waterbodies in each area.
- A review of data from on-going Wayne County, Huron River Watershed Council and ADW Stream Monitoring and Water Quality Monitoring Programs.
- A review of public opinion surveys on watershed issues and water quality concerns conducted by the Southeast Michigan Council of Governments (SEMCOG) in 2004 and the ADW in 2016.
- Topics identified by permittees at quarterly group meetings, in periodic subcommittee meetings and in permittee opinion surveys prior to and throughout the permit cycle.
- Discussion and input from the permitted entities regarding individual jurisdictional versus watershed-wide needs, potential public outreach opportunities, and existing and future programs.

Any additional procedural steps for identifying high-priority or targeted issues by individual permittees include:

The ADW's high priority community-wide issues and targeted issues for collaborative efforts are:

- High yet stable levels of phosphorus in stormwater runoff from most monitored streams indicating broad sources;
- High and increasing *E. coli* counts in most monitored streams;
- High conductivity levels (indicating potential dissolved contaminants) in most monitored streams;
- Moderate to high flashy flows in monitored streams indicating the need for infiltration and storage across the watersheds;

- A need for greater protection of riparian areas to reduce erosion and slow and treat stormwater runoff; and
- Target audience research and public survey results indicating a need for continued education about stormwater pollution and specific residential responsibilities.

The high priority community-wide issues and targeted issues were used to **prioritize** topics A-K for **collaborative efforts.** Existing and Proposed Collaborative Public Education BMPs include in some way all topics, but the emphasis will be on Collaborative High Priority Topics. Individual permittees may have additional or other priorities for individual education efforts as shown below and may address these in Existing and Proposed Individual Public Education BMPs (Section V.):

Collaborative Priority Level	Permittee Priority	Topic Letter	Topic Description
High	High	A	Public responsibility and stewardship in the watershed.
High	High	B	The connection of the MS4 to area waterbodies and the potential impacts of discharges.
High	High	C	Illicit discharges and public reporting of illicit discharges and improper disposal of materials.
Med	Med	D	Promote preferred cleaning materials and procedures for car, pavement, and power washing.
High	High	E	Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.
High	High	F	Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4
High	High	G	Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.
Low	Low	H	Proper septic system care and maintenance, and how to recognize system failure.
Med	Med	I	Benefits of green infrastructure and Low Impact Development.
Med	Med	J	Promote methods for managing riparian lands to protect water quality.
Low	Low	K	Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.

IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs

To address each of the PEP requirements, the permittee will, individually or collaboratively, implement the following specific activities, which include a description, timeline, evaluation component, and the required topic that the activity meets. Activities will be completed with the involvement of responsible parties as noted in each activity description, and/or in cooperation with identified permitted communities.

Time lines for implementation of proposed activities extend from permit issuance (year 1) when implementation of the PEP begins for a period of five (5) years.

Activity #1: Produce and distribute a printed watershed community calendar and social media-driven photo contest

Delivery Mechanism: Coordinated by the ADW, permittees will participate in the bulk printing and distribution of a Watershed Community Calendar to residents. The calendar will include a social media-driven photo contest where residents will be encouraged to post and tag photos related to stormwater pollution-reducing behaviors on social media.

Key Messages: Calendars typically feature a different tip each month for increasing public awareness of watershed issues and improving personal actions affecting the health of their watershed. Topics/messages are likely to include key messages associated with A-J of the PEP topics that are suited for homeowners, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; green infrastructure and LID; and illegal dumping in storm drains.

Target Audience: Residents.

Year/Frequency: Biannually (even calendar years).

Goal: During the permit cycle, the ADW will collaboratively produce a biannual print calendar in even calendar years that permittees will distribute to residents. To promote a calendar-related public photo contest during even calendar years, the ADW will also produce and permittees will distribute monthly social media posts/digital ads/content. The calendar and photo contest will be posted to the ADW website and permittees will provide links from their websites to the ADW website.

Assessment: Number of calendars distributed by the ADW and permittees;
Number of posts/views on ADW social media sites and on the ADW website;
Number of photo contest participants.

Responsible Parties: Permittees produce calendars and coordinate and run the photo contest collaboratively through the ADW. Permittees distribute calendars individually and help promote the photo contest within their communities.

Topics Addressed: A-J

Activity #2: Organize and run focused-topic pollution prevention campaigns

Delivery Mechanism: The ADW will organize and run print or digital pollution prevention pledge campaigns that are focused on a single message or topic and that seek commitment from residents for positive action.

Key Messages: Campaigns will feature a different topic each year for increasing public awareness of watershed issues and improving personal actions affecting the health of their watershed. Topics/messages are likely to include key messages associated with A-J of the PEP topics that are suited for homeowners, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; green infrastructure and LID; and illegal dumping in storm drains.

Target Audience: Residents.

Year/Frequency: Biannually (odd calendar years).

Goal: Biannually, the ADW will collaboratively host one print or digital single-topic pledge campaign. The ADW and permittees will distribute print and digital campaign materials that include a flyer, an ad graphic, and at least eight social media posts through local venues and customer service locations, newsletters and/or other publications, social media and websites.

Assessment: Number of print campaign materials distributed by the ADW and permittees; Number of posts/views on ADW social media sites and on the ADW website; Number of pledges collected.

Responsible Parties: ADW to coordinate and run the campaign as a collaborative effort. Permittees to help promote the campaign individually within their communities.

Topics Addressed: A-J

Activity #3: Provide displays for community venues and outreach activities at events

Delivery Mechanism: The ADW will produce and make available a shared pop-up display and educational posters for use at community venues, regional fairs and events, and community meetings and events. The ADW will host the pop-up display at regional fairs/events with a water, green living or a sustainability focus. Individually, permittees will promote and support stormwater education by displaying posters or the pop-up display at their locations and other key public venues in their community such as municipal libraries, city/township halls, or schools or at community meetings, fairs and/or events.

Key Messages: Public awareness of watershed issues and improving personal actions affecting the health of the watershed also including key messages associated with A-K of the PEP topics, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; benefits of native plants; and illegal dumping in storm drains.

Target Audience: Residents, visitors, community leaders.

Year/Frequency: 2-3 events annually for the ADW collaboratively. Permittee placement of ADW educational posters or pop-up display in at least 1 permittee location or public venue or meeting or event in the permittee's community per year.

Goal: The ADW will produce/provide a pop-up display for ADW and permittee use and a set of educational posters for each permittee during the permit cycle. The ADW will collaboratively host the pop-up display at two regional events annually. Permittees will display posters or host the pop-up display in at least one location or at one community event annually.

Assessment: Name, date and location of event where the ADW hosted the pop-up display; Permittees will also report the location, date and name of meeting/event (if applicable) where they placed posters or hosted the pop-up display in their permittee locations, public venues, meetings/events.

Responsible Parties: ADW and permittees.

Topics Addressed: A-J

Activity #4: Support green schools program with incentives to qualifying ADW schools

Delivery Mechanism: The ADW supports the Michigan Green Schools Program by providing incentives and recognition to participating schools in the ADW area who strive to earn and maintain Green School status. Past incentives have included trees for planting at school locations and educational materials featuring their stormwater benefits. More recently the ADW provided professionally run, curriculum-based in-school watershed workshops and educational signage for five schools earning the Green School designation. The ADW will continue to offer these incentives and educational opportunities to Green Schools annually throughout the permit cycle.

Key Message: Watershed awareness and stewardship.

Target Audience: Wayne county elementary, middle and high school students and teachers

Year/Frequency: Annually.

Goal: The ADW will engage at least three Green Schools in the ADW area each year during the permit cycle in incentives and educational opportunities.

Assessment: ADW will report a list of schools with number of students participating in tree plantings, watershed workshops or other ADW incentives and educational opportunities;
List of schools displaying ADW-provided educational signage or distributing ADW materials;
Number of schools including water-related activities in their Green Schools applications.

Responsible Parties: Wayne County (Green Schools program coordinator) and ADW

Topics Addressed: A, B, I

Activity #5: Support and promote volunteer stream and water quality monitoring

Delivery Mechanism: Permittees will support and assist in promoting the volunteer stream and water quality monitoring programs coordinated by the Huron River Watershed Council (HRWC) and others to their residents. The ADW will produce publicity materials including flyers and press releases, seek earned media placement and run digital or print advertising in watershed media outlets. The ADW will also seek help

	from regional cooperating partners to distribute these materials. Permittees will help promote these programs by distributing materials individually within their communities, providing literature and posting volunteer event opportunities at customer service locations, on web sites, on social media outlets and in newsletters. The ADW will collect and provide information ongoing to permittees on volunteer opportunities prior to events.
Key Messages:	Volunteer monitoring for water quality is conducted spring through fall at stream sites in the ADW waterbodies. Additionally, watershed volunteers and students assess habitat, water quality, and aquatic life via benthic macroinvertebrate monitoring. These programs strive to educate participating watershed residents about their connection to the river and the current conditions. A central goal of the programs is to inspire people to take actions that lead to better river protection at home and in their communities.
Target Audience:	Residents, teachers, students.
Year/Frequency:	Stream monitoring occurs annually at unique events in winter, spring, fall. Water quality monitoring is ongoing spring through fall, with a training in the spring.
Goal:	The ADW and permittees will promote three one-day volunteer macro-invertebrate monitoring events in the Huron River watershed and a seasonal volunteer chemistry and flow monitoring program in the Huron River and ADW area that are coordinated by the Huron River Watershed Council.
Assessment:	Compilation of all promotional efforts by the ADW; Number of people participating in events as recorded by HRWC; Resulting stewardship actions taken as reported by participants through event surveys conducted by HRWC; Permittees will also report individual efforts to distribute promotional event materials.
Responsible Parties:	Permittees, ADW, HRWC.
Topics Addressed:	A in particular, but also B-J

Activity #6: Stream and river crossing road signs

Description:	Through an ADW program, permittees have previously installed 80 stream crossing and watershed signs along roads where creeks or streams cross as well as at locations near watershed boundaries. Permittees will maintain these existing signs and the ADW will review and promote the placement of additional signs in areas where a need for signage has been identified and not met, coordinating or facilitating sign production for members.
Target Audience:	Visitors, residents.
Year/Frequency:	Ongoing.
Goal:	The ADW has recently completed a baseline survey and map inventory of existing stream crossing and watershed signs documenting location, type and condition. Based on survey results the ADW will advise permittees regarding maintenance and replacement needs and will recommend additional sign locations to increase visibility and public recognition. The ADW will facilitate the production of replacement signs and at least 5 new signs during the permit cycle. Permittees will install and maintain signage.
Assessment:	Survey results, map inventory and recommendations;

	Number of new and replacement signs produced by the ADW; Permittees will report installation and maintenance activities.
Responsible Parties:	ADW and local community officials, permittees.
Topics Addressed:	A

Activity #7: Participate in regional partnership activities

Delivery Mechanism:	The ADW and permittees will seek to participate and collaborate with regional partners such as SEMCOG, the Alliance of Rouge Communities, Great Lakes Commission, Friends of the Detroit River, Detroit International Wildlife Refuge and others in activities that further public education on watershed awareness and stormwater issues. The ADW will attend regional partner meetings and report potential opportunities to ADW members.
Key Messages:	Collaborative efforts are effective at reaching a greater number of target audiences with persuasive messaging that works.
Target Audience:	Stakeholders of partner organizations.
Year/Frequency:	3-4 meetings annually.
Goal:	The ADW collaboratively will identify opportunities to build upon and improve collaborative public education efforts by seeking out and attending at least three meetings annually with regional groups working on watershed awareness and stormwater issues.
Assessment:	ADW provided list of meetings with date, location, meeting topic and participating groups and any resulting opportunities identified and reported to permittees.
Responsible Parties:	ADW and individual permittees.
Topics Addressed:	A-K

Activity #8: Promote county-wide complaint tracking and response system

Delivery Mechanism:	Permittees will educate the public on illicit discharges and work with Wayne County to publicize county-wide public reporting and response system for illicit discharges or improper disposal of materials into local storm drain systems. A 24- Hour Environmental Hotline is in place and administered by the Wayne County Department of Public Services. The County promotes the use of the 24-Hour Environmental Hotline on County web sites. Permittee efforts will include providing public information and promoting the Hotline at their customer service locations, on web sites and social media outlets and in newsletters.
Key Messages:	Prevention and reporting of illicit discharges and/or improper disposal of materials into MS4s.
Target Audience:	Residents, visitors, commercial and industrial businesses, local government officials and employees.
Year/Frequency:	Ongoing promotional efforts.
Goal:	The ADW and permittees will annually distribute materials with the hotline number referenced and will promote the hotline on the ADW and permittee websites and social media outlets or newsletters.
Assessment:	Number of materials distributed annually with hotline number referenced reported by ADW for collaborative efforts and reported by permittees for permittee efforts.

-Number of views on ADW website and social media reported by ADW

Responsible Parties: ADW, Wayne County, permittees.

Topics Addressed: B, C, K

Activity #9: Promote water resource protection workshops

Delivery Mechanism: The permittees will promote regional educational workshops and programs for residential, business and municipal target audiences that are organized through agencies such as Wayne County, MSU Extension, SEMCOG, the Michigan Water & Environment Association, the Natural Shorelines Partnership, the Friends of the Detroit River, the Alliance of Rouge Communities, Friends of the Rouge and others. Permittee efforts will include providing public information and promoting workshops at their customer service locations, on web sites and social media outlets and in newsletters.

Key Messages: Programs may include the following: Watershed Management Short Course, Master Rain Gardener and Master Composter program, the Michigan Water Stewards program, watershed-friendly golf course management workshop, illicit discharge and connections elimination workshop, road salt BMP/de-icing alternatives workshop, land use/storm water planning workshops, and riparian land management workshops.

Target Audience: Residents, government officials and employees, construction contractors, and developers.

Year/Frequency: Throughout the permit cycle as workshop dates are established and need for promotional assistance are identified by others.

Goal: The ADW and permittees will annually distribute information and promotional materials for at least one regional educational workshop/program through customer service locations websites, social media outlets and newsletters.

Assessment: Number of materials distributed annually reported by ADW for collaborative efforts and reported by permittees for permittee efforts;
Number of views on ADW website and social media reported by ADW.

Responsible Parties: Permittees will promote workshop events as developed by outside agencies.

Topics Addressed: K in particular, but also A-J

Activity #10: Promote county household hazardous waste reduction program

Delivery Mechanism: Permittees will work with Wayne County to publicize residential disposal options for flammable, poisonous, toxic and corrosive materials through community collection events, and informational materials for the public that promote the collection events and proper disposal of household hazardous waste and recycling. Permittee efforts will include providing public information and promoting collection events and information at their customer service locations, on web sites and social media outlets and in newsletters.

Key Messages: The program seeks to address the environmental (including water quality) and public health effects resulting from improper handling and disposal of household hazardous waste, and is committed to reducing the use of home toxics and keeping citizens informed about the choices and responsibilities associated with purchasing, handling and disposing of toxic substances.

Target Audience:	Wayne County residents.
Year/Frequency:	Annually. HHW collections are typically held by the Wayne County Department of Public Services 4 times each year in different communities.
Goal:	The ADW and permittees will annually distribute information and promotional materials for all HHW collections scheduled by Wayne County through customer service locations websites, social media outlets and newsletters.
Assessment:	Number of materials distributed annually reported by ADW for collaborative efforts and reported by permittees for permittee efforts; Number of views on ADW website and social media reported by ADW.
Responsible Parties:	Resource Recovery Guide is produced by Wayne County. Events and informational materials are promoted by Wayne County and permittees.
Topics Addressed:	G

V. EXISTING AND PROPOSED INDIVIDUAL PUBLIC EDUCATION BMPs

Reported above and as follows:

Activity #1: Promote and Provide General Environmental Information to Public

Delivery Mechanism:	Permittee efforts will include providing public information and promoting general environmental events and information at the Township's customer service locations and on the Township of Grosse Ile web site.
Key Messages:	The program seeks to address the environmental (including water quality) and public health effects resulting from a wide range of topics of concern.
Target Audience:	Grosse Ile Residents.
Year/Frequency:	Annually.
Goal:	The Township will provide/have available information and materials for environmental (including water quality) at customer service locations and the Township of Grosse Ile website
Assessment:	Approximate number of materials distributed annually reported by the Township; Number of views on the Township website reported by the Township.
Responsible Parties:	Township of Grosse Ile.
Topics Addressed:	**C**-G

VI. OTHER INVOLVED ORGANIZATIONS

In implementing this Public Education Plan, the permittees will pursue cooperative partnerships plus information and resource sharing with several organizations, including but not limited to:

Organization	Program	Contact If Known
Alliance of Downriver Watersheds	Chairperson Facilitation Team Leader	Jim Gorris, City of Gibraltar Vicki Putala, OHM
Huron-Clinton Metropark Authority, Pointe Mouillée State Game Area (Michigan Department of Natural Resources), Detroit River International Wildlife Refuge, Friends of the Detroit River, Detroit Riverkeeper	Environmental Education and Interpretive Programs	Jennifer Hollenbeck, HCMA; Zach Cooley, Pointe Mouillée State Game Area; Susan White, DRIWR; Robert Burns, Detroit Riverkeeper
Huron River Watershed Council	Water Quality Monitoring Program, Facilitation of Collaborative Permittee Activities, Information and Education Campaign	Ric Lawson Andrea Paine Pam Labadie
Wayne County Department of Public Services, Water Quality Management Division	Workshops, Illicit Discharge & Dumping Response System, water quality monitoring; watershed signs and informational displays; Green Schools program	Noel Mullett Mike Flowers Nancy Gregor
Wayne County Department of Public Services, Land Resource Management Division	Household Hazardous Waste Collection Sites, composting, waste disposal and recycling	John Demerjian
MSU Extension – Wayne County	Horticulture & Natural Resources, Watershed Management, and other programs	Gary Williams, Extension Educator, Natural Resources-Outdoor Education; Mary Bohling, Extension Educator, Sea Grant; Kristine Hahn, Extension Educator, Consumer Horticulture
Michigan Department of Environmental Quality	Water Resources Division, Field Operations Section, MS4 Staff	Lishba Varughese Erica Stevenson
Michigan Water Environment Association	The Michigan Water Network (MWN) information conduit and repository for important news, data, facts, etc. pertaining to the water-related issues of Michigan and the Great Lakes	Allison Wood, Executive Director
Southeast Michigan Council of Governments	Workshops, educational events, and public education materials, SEMCOG Partners for Clean Water	Katherine Grantham

VII. EVALUATION OF EFFECTIVENESS

Evaluation of the overall effectiveness of the PEP will consist of a combination of both the accumulated measures of the effectiveness of the PEP's individual activities and a measure of the effectiveness of the sum of all the activities.

Evaluation of accumulated measures of the effectiveness of the PEP's individual activities success can be categorized in terms of output (i.e., effort or activity) that measures sort-term goals and milestones. Examples of output measurements include tracking web site hits or the number of literature pieces distributed to a target audience.

When practicable, measurements of outcome (i.e., results that indicate actual behavior change) will be incorporated into BMP activity evaluations. Such measures are expected to include public comment and feedback, level of participation in programs and activities, and tools that measure behavior change. When applicable, these measures will be reasonably coordinated with other communities and organizations and will be designed to supplement or provide comparison to the ADW's 2016 Resident Survey on Water Quality. Results will serve to provide a basis for evaluating PEP activities going forward and will provide an opportunity to benchmark social indicators for subsequent permit cycles.

VIII. PERIODIC PROGRESS REPORT

Permittees will provide documentation of PEP efforts, a summary of the evaluation of its effectiveness when appropriate, and any proposed revisions or amendments to the PEP program in the periodic stormwater reports to the MDEQ. Reporting on PEP efforts will reflect data gathered on a calendar year basis.

STORMWATER DISCHARGE PERMIT APPLICATION
COLLABORATIVE PUBLIC EDUCATION PLAN TABLE
For the Alliance of Downriver Watersheds MS4s

Public Education Topic	BMP Activity #	BMP Activity Description	Partner Collaboration	Target Audience	Key Message	Delivery Mechanism	Year	Frequency	Reponsible Party	Goal	Assessment
A-J	1	Watershed community calendar and social media photo contest	Yes	Residents	A-J	Distributed print calendar and photo contest on social media	Even calendar years	Biannually	ADW/Permittees	During the permit cycle, the ADW will collaboratively produce a biannual print calendar in even calendar years that permittees will distribute to residents. To promote a calendar-related public photo contest during even calendar years, the ADW will also produce and permittees will distribute monthly social media posts/digital ads/content. The calendar and photo contest will be posted to the ADW website and permittees will provide links from their websites to the ADW website.	Number of calendars distributed by the ADW and permittees; Number of posts/views on ADW social media sites and on the ADW website; Number of photo contest participants.
A-J	2	Focused topic pollution prevention pledge campaigns	Yes	Residents	A-J	Digital pollution prevention pledge campaign seeking resident commitmen toward a positive action	Odd calendar years	Biannually	ADW/Permittees	Biannually, the ADW will collaboratively host one print or digital single-topic pledge campaign. The ADW and permittees will distribute print and digital campaign materials that include a flyer, an ad graphic, and at least eight social media posts through local venues and customer service locations, newsletters and/or other publications, social media and websites.	Number of print campaign materials distributed by the ADW and permittees; Number of posts/views on ADW social media sites and on the ADW website; Number of pledges collected.
A-J	3	Displays at community venues and outreach activities at events	Yes	Residents, visitors, community leaders	A-J	Pop-up display and educational posters at regional fairs and events and community venues, meetings or events	1-5	2-3 regional fairs and events annually; On-going at community venues	ADW/Permittees	The ADW will produce/provide a pop-up display for ADW and permittee use and a set of educational posters for each permittee during the permit cycle. The ADW will collaboratively host the pop-up display at two regional events annually. Permittees will display posters or host the pop-up display in at least one location or at one community event annually.	Name, date and location of event where the ADW hosted the pop-up display; Permittees will also report the location, date and name of meeting/event (if applicable) where they placed posters or hosted the pop-up display in their permittee locations, public venues, meetings/events.
A, B, I	4	Support county green schools program	Yes	Students, teachers	A, B, I	Incentives, educational opportunities and activities (water-related) for green schools and watershed educational signage	1-5	Annually	Wayne County/ADW	The ADW will engage at least three Green Schools in the ADW area each year during the permit cycle in incentives and educational opportunities.	ADW will report a list of schools with number of students participating in tree plantings, watershed workshops or other ADW incentives and educational opportunities; List of schools displaying ADW-provided educational signage or distributing ADW materials; Number of schools including water-related activities in their Green Schools applications.
A primary, B-K secondary	5	Support/promote volunteer stream and water quality monitoring	Yes	Residents, students, teachers	A, B-K	Permittees promote HRWC volunteer water quality monitoring; and volunteer and student benthic macrointertebrate monitoring	1-5	Annually spring-fall; annually at unique events winter, spring, fall	HRWC/ADW/Permittees	The ADW and permittees will promote three one-day volunteer macro-invertebrate monitoring events in the Huron River watershed and a seasonal volunteer chemistry and flow monitoring program in the Huron River and ADW area that are coordinated by the Huron River Watershed Council.	Compilation of all promotional efforts by the ADW; Number of people participating in events as recorded by HRWC; Resulting stewardship actions taken as reported by participants through event surveys conducted by HRWC; Permittees will also report individual efforts to distribute promotional event materials.

STORMWATER DISCHARGE PERMIT APPLICATION
COLLABORATIVE PUBLIC EDUCATION PLAN TABLE
For the Alliance of Downriver Watersheds MS4s

Public Education Topic	BMP Activity #	BMP Activity Description	Partner Collaboration	Target Audience	Key Message	Delivery Mechanism	Year	Frequency	Reponsible Party	Goal	Assessment
A, B, C	6	Stream and river crossing road signs	Yes (to install and/or maintain)	Residents, visitors	A	Roadside Signage	1-5	On-going	ADW/local community officials/Permittees	The ADW has recently completed a baseline survey and map inventory of existing stream crossing and watershed signs documenting location, type and condition. Based on survey results the ADW will advise permittees regarding maintenance and replacement needs and will recommend additional sign locations to increase visibility and public recognition. The ADW will facilitate the production of replacement signs and at least 5 new signs during the permit cycle. Permittees will install and maintain signage.	Survey results, map inventory and recommendations; Number of new and replacement signs produced by the ADW; Permittees will report installation and maintenance activities.
J, K	7	Participate in regional partnership activities	Yes	Stakeholders of partner organizations; residents	A-K	Participate with regional partners in activities that that further public education of watershed and stormwater issues	1-5	On-going; identify and attend 3-4 partner meetings annually	ADW/Permittees	The ADW collaboratively will identify opportunities to build upon and improve collaborative public education efforts by seeking out and attending at least three meetings annually with regional groups working on watershed awareness and stormwater issues.	ADW provided list of meetings with date, location, meeting topic and participating groups and any resulting opportunities identified and reported to permittees.
A-K	8	Promote county-wide complaint tracking and response systems	Yes (to promote)	Residents; visitors; commercial and industrial businesses; local govt officials and employees	B, C, K	Permittees will publicize and promote regional reporting lines with print and digital promotional information	1-5	On-going	Wayne County/ADW/Permittees	The ADW and permittees will annually distribute materials with the hotline number referenced and will promote the hotline on the ADW and permittee websites and social media outlets or newsletters.	Number of materials distributed annually with hotline number referenced reported by ADW for collaborative efforts and reported by permittees for permittee efforts.
B, C	9	Promote water resource protection workshops	Yes (to promote)	Residents, local govt officials and employees; construction contractors and developers	A-J	Permittees will publicize and promote regional educational workshops at customer service locations, on websites, social media outlets and/or newsletters	1-5	On-going as workshops are organized	ADW/Permittees	The ADW and permittees will annually distribute information and promotional materials for at least one regional educational workshop/program through customer service locations websites, social media outlets and newsletters.	Number of materials distributed annually reported by ADW for collaborative efforts and reported by permittees for permittee efforts; Number of views on ADW website and social media reported by ADW.
A, G	10	Promote county household hazardous waste reduction program	Yes (to promote)	Residents	G	Permittees will publicize and promote county collection events and proper disposal of household hazardous waste and recycling with print and digital promotional information	1-5	Annually	Wayne County/ADW/Permittees	The ADW and permittees will annually distribute information and promotional materials for all HHW collections scheduled by Wayne County through customer service locations websites, social media outlets and newsletters.	Number of materials distributed annually reported by ADW for collaborative efforts and reported by permittees for permittee efforts; Number of views on ADW website and social media reported by ADW.

Permittees in the Alliance of Downriver Watersheds:

Allen Park
Belleville
Dearborn Heights
Ecorse
Flat Rock
Gibraltar
Grosse Ile Township
Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township
Taylor
Van Buren Township
Wayne County
Westland
Woodhaven
Woodhaven-Brownstown School District
Wyandotte

STORMWATER DISCHARGE PERMIT APPLICATION
COLLABORATIVE PUBLIC EDUCATION PLAN TABLE

Public Education Topic	Key Message
A. Promote public responsibility and stewardship in the applicant(s) watershed.	Watershed defininition, location, purpose for protecting, ways to affect, also including recreational and economic benefits of local water resources.
B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.	Recognition of and how to locate. Lack of treatment and flow impacts to water quality and water body to which MS4 is connected.
C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.	What it is, promotion of reporting system and how to use, water quality impacts, indentification of on-site sewage disposal and symptoms of failure, consequences to water quality.
D. Promote preferred cleaning materials and procedures for car, pavement, and power washing.	Preferred cleaning materials and procedures.
E. Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.	Proper application and disposal.
F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.	Proper disposal.
G. Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.	Identification of household hazardous wastes and proper disposal.
H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.	Proper care and maintenance, recognition of failure, water quality impacts.
I. Educate the public on and promote the benefits of green infrastructure and Low Impact Development.	Benefits of green infrastructure and low impact development and implementing landscaping for water quality in residential applications.
J. Promote methods for managing riparian lands to protect water quality.	Benefits of riparian buffers of native plants, shrubs and trees for preventing erosion and runoff into waterbodies.
K. Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.	Storage of chemicals to prevent exposure to stormwater runoff, proper disposal of grease and waste from food preparation, best practices for kitchen maintenance and recycling to prevent improper disposal.

Appendix E

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN

For the Alliance of Downriver Watersheds MS4s

Effective upon NPDES Permit issuance for a period of five (5) years.

Allen Park	Inkster	Taylor
Belleville	Lincoln Park	Van Buren Township
Dearborn Heights	Melvindale	Wayne County
Ecorse	Riverview	Westland
Flat Rock	Rockwood	Woodhaven
Gibraltar	Romulus	Woodhaven-Brownstown
Grosse Ile Township	Southgate	School District
	Sumpter Township	Wyandotte

May 31, 2019

Table of Contents

I. INTRODUCTION

This Collaborative Illicit Discharge Elimination Plan (IDEP) presents **the watershed-wide priority action plan that is being pursued to effectively and efficiently identify and eliminate illicit discharges within the Alliance of Downriver Watersheds** (ADW). This Plan consists of existing and planned activities and strategies, anticipated through the duration of the permit, that ADW members are individually and collectively implementing to identify and eliminate illicit discharges and reduce pathogen levels in Ecorse Creek, Combined Downriver, and Lower Huron River watersheds. This collaborative plan builds on the collective knowledge of the ADW members and implementation team. Specifically, the plan starts by evaluating the status and trends of surface waters in the ADW to identify priorities, followed by investigation and remediation of problem areas. Such a strategy focuses resources on the most likely sources of pollution or illicit discharge, rather than on areas with low likelihoods of problems.

The Alliance of Downriver Watersheds (ADW) is a permanent watershed organization in southeast Michigan and formed under Public Act 517 of the Public Laws of 2004. The ADW formally established themselves in 2007, but members have been working together for many more years to manage the area's water resources. The ADW consists of 23 public agencies in the Ecorse Creek, Combined Downriver, and Lower Huron River Watersheds within Wayne County. The ADW is relatively urban in nature consisting of 203.3 square miles of land mass and more than 450,000 people (2010 census). Major watercourses within the ADW that flow into the Detroit River and Lake Erie include Ecorse Creek, Sexton Kilfoil Drain, Frank and Poet Drain, Blakely Drain, Brownstown Creek, Huron River, Silver Creek, and Woods Creek.

The consortium of agencies that make up the ADW meet on a regular basis and work together to cooperatively manage the rivers, lakes, and streams within the watershed. Examples of ADW efforts include long-term water quality monitoring, stormwater permit compliance and reporting to the State, submittal of grant applications for water quality improvements, public education, and illicit discharge identification and elimination. Collaborative IDEP efforts began in 2007 when the ADW budgeted $101,094 for Wayne County Department of Public Services to provide staff training and to perform problem area identification across the watershed area over a two-year period. Since 2010, the ADW has budgeted over $840,000 for collaborative IDEP activities. Over 150 ADW member staff have received IDEP training and Wayne County alone has performed IDEP advance investigation (specifically facility dye-testing) at over 280 commercial and municipal facilities throughout the ADW watersheds.

II. PRIORITY AREAS

There is evidence of elevated levels of *E.coli* throughout portions of the ADW. An *E.coli* total maximum daily load (TMDL) allocation plan was developed for the Ecorse Creek watershed by the MDEQ in 2008. ADW member municipalities support a robust program to monitor surface waters for chemistry, biology and stream flow. Monitoring conducted by citizen volunteers, Huron River Watershed Council (HRWC), Wayne County, and MDEQ staff have established baseline conditions, current status and trends over the last six years in the ADW. Analysis of the monitoring data has allowed the ADW Technical committee to prioritize IDEP work areas. The data used includes: MDEQ Bacterial Source Tracking (BST) studies conducted in 2007 within the Ecorse Creek watershed; monitoring conducted by Wayne County across the ADW through the MDEQ grant in 2007-2008; monitoring conducted by Wayne County in 2015 through a SAW grant; and, annual volunteer and staff monitoring funded by the ADW beginning in 2012 that continues through the present. Priority areas may change during the course of the permit based on new data and/or elimination of certain areas based on investigation.

To identify priority IDEP work areas, the ADW Technical Committee uses the following process and criteria. At the end of each sampling season (usually in February or March), the committee evaluates the past year's surface water monitoring results. The monitoring includes a number of long-term sampling stations and 3-5 one-season investigative stations. Investigative stations are used to subdivide watersheds in an attempt to narrow in on potential pollutant sources. New or unusual results are flagged and discussed. The team evaluates the biological and chemical status at each monitoring site and summarizes results for subdrainages across the three watersheds. The direction and amplitude of trends are also evaluated. Drainages with the worst current conditions and trends are listed for prioritization according to the below criteria. Observations by the monitoring team and volunteer collectors about short-term conditions, climatic variables and other influences are also discussed. The criteria are regularly evaluated for revision.

The criteria used to identify them as a priority included:

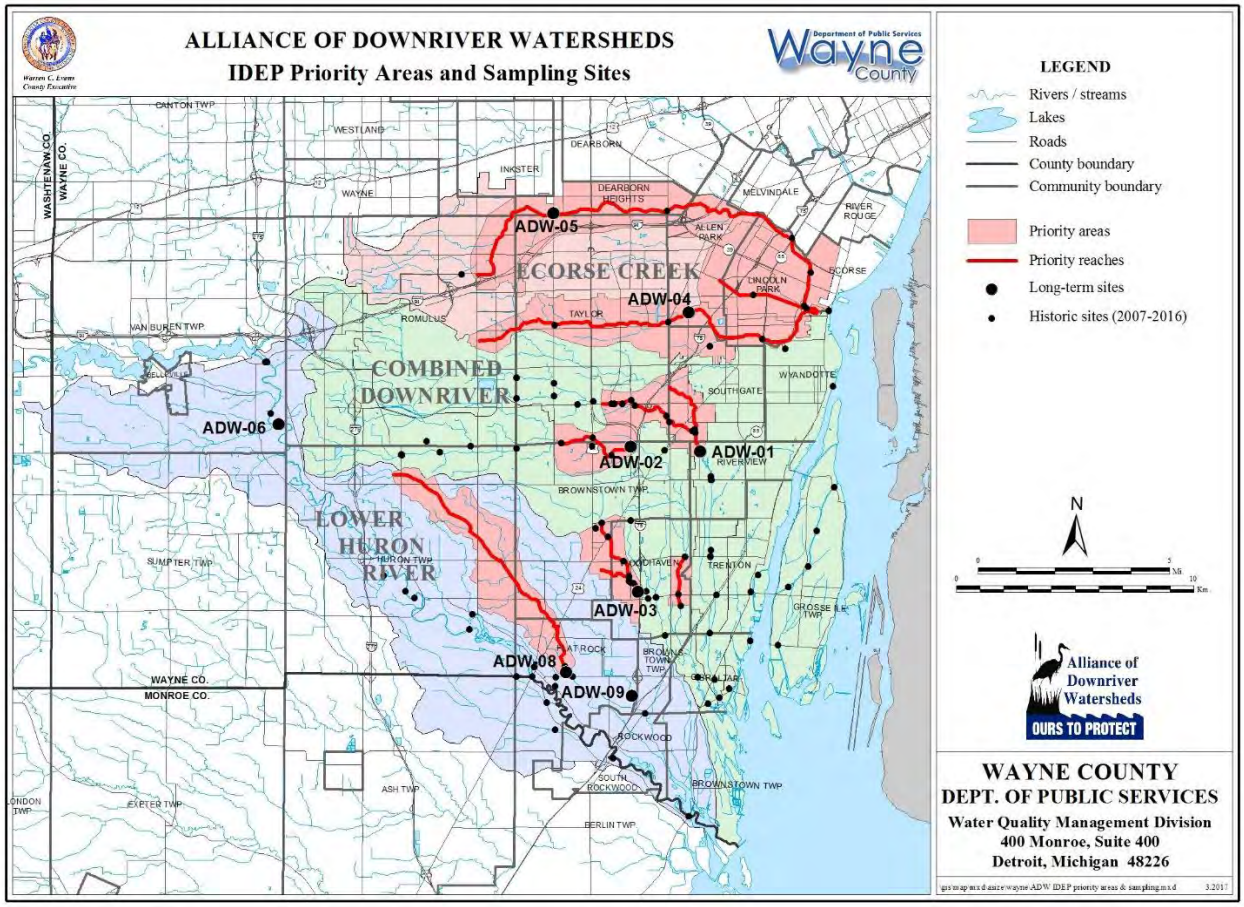
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling
- Wayne County's 2007 IDEP Monitoring found 3 or more monitoring events with one or more elevated IDEP monitoring parameters
- Areas upstream of sites with unexplained, declining macroinvertebrate populations

Priority IDEP Work Areas

Eight stream segments were identified by the ADW Technical Committee as Priority IDEP Work Areas (Figure 1) for the [permit period]. Three of the 8 areas are within the Ecorse Creek watershed (*North Branch Ecorse Creek, LeBlanc Drain, S. Branch Ecorse Creek*); 4 areas are within the Combined Downriver watershed (*Blakely Drain, Frank & Poet Drain and Brownstown Creek*); and 1 of the 8 areas are within the Lower Huron River watershed (*Silver Creek*). The areas that drain to these eight stream segments constitute approximately 28% of the total ADW area. These areas are shown in Figure 1.

Within the Priority Areas, ADW members will implement all of the Collaborative IDEP Activities described below. The ADW will also dedicate the majority of their annual ADW IDEP budget, during the term of the permit, to perform IDEP Advanced Investigations (IDEP#2) and Inspection of ADW Member Facilities (IDEP#6) to aggressively identify and eliminate sources of human sewage and elevated bacteria in these Priority Areas.

Figure 1: IDEP Priority Work Areas and Monitoring Sites



Routine IDEP Areas

All other areas of the ADW are being classified as Routine IDEP Areas. Within these Routine Areas, ADW members will implement the Collaborative IDEP Activities as described below, but little of the annual ADW IDEP budget will be utilized to implement these activities. Collaborative IDEP activities in these routine areas will focus on (IDEP #3: Staff Training) and (IDEP #10: Volunteer Training) to identify and report suspicious discharges including sanitary sewer discharges to storm sewers or surface waters. In addition, the Inspection of ADW Member Facilities (IDEP#6) will also be performed in the Routine IDEP Areas to identify and eliminate sources of human sewage and elevated bacteria.

III. COLLABORATIVE IDEP ACTIVITIES

IDEP# 1: IDEP Investigative & Progress Evaluation Monitoring

Funding: ADW

Activity Description: Consistent with the ADW's 5-year monitoring strategy, the ADW will utilize HRWC, Wayne County, and volunteers to perform instream water quality monitoring to identify problems areas, prioritize advanced investigation activities, and track water quality data trends to assess IDEP progress. Eight (8) long-term sites have been established and will be monitored annually along with four (4) additional annual rotating investigative sites to attempt to identify new problems and/or refine priority action areas and advance investigation activities (see Figure 1).

Schedule: Annually, April – September

ADW Member Responsibilities:

- ADW
    - Review and approve annual budgets and work plans to ensure resources are directed to the appropriate areas
    - Conduct annual monitoring at 8 long-term sites and 4 investigative sites as outlined in the ADW monitoring plan (see TMDL Implementation Plan)

Measure of Assessment:

- Number/portion of sites sampled

BMP Goal:

- 100% of long-term and investigative sites sampled, as outlined in the ADW monitoring plan

IDEP #2: Environmental Hotline and Coordinated Complaint Response

Funding: Wayne County, ADW Members

Activity Description: Wayne County operates an environmental hotline to field and respond to environmental complaints including illegal dumping and suspicious discharges. Local communities also receive pollution complaints directly from residents. Local communities will promote the use of the County hotline number by their residents (as discussed in the ADW Collaborative Public Education Plan) and assist with and/or perform follow up complaint response as appropriate. Community staff may also identify a potential pollution issue during their day-to-day activities. These issues will be handled just like a pollution complaint from a resident.

Investigative responses will range from a site visit that fails to confirm a problem to full scale advanced investigation to identify the source and eliminate the illicit discharge.

Schedule: Continuous

ADW Member Responsibilities:

- ADW
    - Develop and distribute a log sheet that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities. See Attachment A.
    - Develop and distribute a complaint response form to be utilized by ADW members. See Attachment A.
    - Maintain a list of community contacts and update annually via annual ADW membership General Facilitation survey.
- Communities and nested school districts
    - Provide the county with a contact person for addressing pollution complaints.
    - Track status of complaints handled internally or those referred to them.
    - Track and record follow up communication from resident complaints as appropriate.
    - Investigate and resolve complaints within their MS4.

- Wayne County
    - Provide technical guidance as requested by local communities.
    - Track the status of any pollution complaints that they investigate.
    - Track and record follow up communication regarding complaints as appropriate.
    - Investigate and resolve complaints within their MS4.

Measures of Assessment:

- Number of complaints received, referred, and investigated
- Number of issues identified
- Number of issues resolved

BMP Goal:

- 100% of complaints addressed and plan for resolution identified

IDEP #3: Priority Area IDEP Advanced Investigations
Funding: ADW

Activity Description: Using water quality data, system data/knowledge, and/or pollution complaints, the ADW Technical Committee will continue to prioritize areas for advanced investigations to identify and eliminate the source of illicit discharge/poor water quality. Priority areas may change during the course of the permit based on new data and/or elimination of certain areas based on investigation. The Wayne County Water Quality Management Division will lead investigation efforts in the priority areas, as identified in Section II of this plan, with assistance from the local communities. Advanced investigations may include outfall/stream surveys, instream water quality investigative monitoring, manhole inspection or sampling, dye-testing, smoke testing, or televising. Procedures for these investigative methods can be found in Attachment B. When a potential IDEP issue is suspected outside the participating members/ jurisdictions, it will be referred to the appropriate jurisdiction for their follow-up. The referral will occur in writing and include the rationale for the referral.

Schedule: Years 1-5 of permit for IDEP Priority Work Areas

ADW Member Responsibilities:

- ADW
    - Review and approve annual budgets and work plans to ensure resources are directed to the appropriate areas.
    - Hold ADW Technical Committee discussions to review ongoing investigations. The Technical Committee will also provide its recommendations for priority areas to Members. Members will provide feedback on the appropriateness of the selected priority areas and can also nominate areas for priority investigations. Nominations will be taken once every 5 years or more frequently if deemed necessary by the Technical Committee. Nominations will be reviewed by the Technical Committee to determine if they should be included for priority investigation.
    - Facilitate between Wayne County and MS4s on strategies to locate sources.

- Communities and Nested School Districts
    - Assist the County in conducting advanced investigations to locate sources. This may include providing maps and staff, tracking suspicious discharges up their MS4s, and supplying staff/equipment/contractor as the situation requires (e.g. closed circuit televising equipment).
    - Work with property owners to eliminate identified sources and track correction measures.
    - Lead enforcement measures as appropriate.
- Wayne County
    - Lead investigations in priority areas to identify illicit discharge sources.
    - Track investigation efforts and provide reports.

Measures of Assessment:

- Number of outfalls inspected/dry weather screened
- Length of streams surveyed
- Amount of instream water quality investigative monitoring performed
- Number of manhole inspections
- Amount of dye testing performed
- Amount of smoke testing performed
- Amount of televising performed
- Number of illicit connections/discharges found and resolved

BMP Goals:

- Follow the advanced investigation protocol for Priority Area IDEP Advanced Investigations (Attachment B).
- 100% of known illicit connections resolved or plan in place for resolution

IDEP #4: Staff Training

Funding: ADW

Activity Description: There are several mechanisms available for IDEP training for various competencies as described below. Each permittee will have at least one person trained at the Investigator Level and 50% of field staff at the Alert Observer Level. Field staff is defined as those working at least 50% of their day out-of-the-office and includes Department of Public Works/Services staff and community building/plumbing inspectors.

Investigator Level

The Wayne County Illicit Discharge Investigator Training (a half day training workshop) where attendees are taught how to identify and investigate the sources of illicit discharges including failing septic systems, seepage from sanitary sewers, illegal dumping, and suspicious discharges from outfalls. A competency exam is also administered at the end of the workshop.

Alert Observer Level

Training at this level can consist of one of the following:

- The Alert Observer IDEP Training (a 30 minute to 1 hour workshop) which provides the goals of the IDEP program, how to recognize illicit discharges and conduct field screenings, and the mechanisms to report suspicious discharges.
- The Working for Clean Water municipal staff training (a 15-minute video) where attendees are provided a general overview of the IDEP program, how to recognize illicit discharges, encouraged to report suspicious discharges, and provides pollution prevention and good housekeeping best management practices.

In addition, an IDEP Tip Card for Municipal Staff, which was developed by the Southeast Michigan IDEP Work Group, will be provided to field staff for both training programs. The Tip Card provides photographic examples of illicit discharges and phone numbers to report complaints.

Each community and county should have at least one person who is trained at the Investigator Level. If not currently, this will be obtained in Year 1 of the permit. This level of training will be maintained. Wayne County and the ADW will continue to offer the Investigator Training Workshop to ADW membership every other year according to the Southeast Michigan Regional IDEP Training Plan (See Attachment C). ADW staff will look to extend the training plan another 5 years or offer an alternate training program if one is not available.

The Working for Clean Water video will be made available on the ADW's website or by searching "IDEP Municipal Training" on www.YouTube.com. The Alert Observer Training Workshop will be included in the municipal pollution prevention training every other year according to the IDEP Training Plan (See Attachment C). Additional training opportunities can be arranged if demand warrants. The Tip Card will be distributed at the Investigator and Alert Observer trainings and can be obtained on the ADW's website.

Schedule: One person trained at the Investigator Level, confirmed annually
50% of field staff will be trained at the Alert Observer Level by Year 3 of the permit

ADW Member Responsibilities:

- ADW
  - Provide funding for the Investigator Training and Alert Observer Training Workshops
  - Provide Working for Clean Water video on ADW website
  - Provide Tip Card on ADW website
- Communities, Wayne County
  - Provide IDEP training to field staff
  - Provide field staff the IDEP Tip Card for Municipal Staff in conjunction with the training sessions
  - Document and track staff training

Measures of Assessment:

- Number of staff trained

BMP Goals:

- 1 person per MS4 trained at Investigator Level
- 50% of field staff trained at the Alert Observer Level

IDEP #5: Inspection of ADW Member Owned Facilities
Funding: ADW

Activity Description: Dye-testing will be conducted on ADW member-owned or operated facilities by County IDEP staff for the purpose of identifying any illicit connections or illicit discharges. Any identified issues will be corrected by owner. Many of the ADW member-owned facilities have already been dye-tested. A list of facilities that have not yet been dye-tested is included as Attachment D. Any changes to this list during the course of the permit will be submitted to the DEQ.

Schedule: Years 1-2 of permit for Priority IDEP Work Areas
Years 3-5 of permit for Routine IDEP Areas

ADW Member Responsibilities:

- ADW
  - Provide funding for facility dye-testing
- Wayne County
  - Provide staff to conduct facility inspections
- Communities and School Districts:
  - Provide the ADW a list of facilities needing to be dye tested.
  - Provide access to facilities and plans, if available, and storm/ sanitary sewer maps for the immediate area.
  - Repair/correct illicit connections/discharges that were revealed during the site inspection. If the discharge is significant, take immediate steps to stop the illicit discharge

Measures of Assessment:

- Number of facilities dye tested
- Number of issues identified
- Number of issues resolved

BMP Goals:

- Develop a completed list of ADW member-owned facilities
- 100% of ADW member-owned facilities dye tested in priority areas
- 50% of ADW member-owned facilities dye tested in routine areas
- 100% of issues addressed, or a plan in place to address

IDEP #6: Visual Inspection during Routine Field Operations
Funding: ADW, Wayne County, and Communities

Activity Description: Consistent with IDEP#4 & IDEP#9, field staff involved in various work programs have been trained to identify and report suspicious discharges during routine field operations. Routine field operations may include:

- Catch basin cleaning/repairs
- Mosquito treatment of catch basins for West Nile Virus
- Street and parking lot sweeping
- Re-ditching and open ditch maintenance, and
- Sanitary sewer maintenance (cleaning, CCTV, lining)

In order to aid in this activity, the ADW will develop and distribute a consistent procedure and forms for ADW members to appropriately document their response to potential illicit discharge complaints and corrective actions taken to eliminate illicit discharges. A log form will also be developed that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities (form to include Wayne County hotline number).

Community field staff will be reminded to be alert for illicit or suspicious discharges, especially those in Priority Areas. This reminder will include key points in identifying and reporting suspected illicit discharges.

Schedule: Routine Maintenance Field Work - Continuous
Training – see IDEP #4 and IDEP #9
Develop consistent template for IDEP procedures and recommended responses for use by field staff
Develop checklist for ADW field staff to document that illicit discharges were looked for during routine maintenance activities
Reminder to Priority Area Members– two times per year

ADW Member Responsibilities:

- ADW
  - Develop and distribute a consistent procedure and forms for ADW members to appropriately document their response to potential illicit discharge complaints and corrective actions taken to eliminate illicit discharges. See Attachment A.
  - Develop and distribute a log sheet that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities (log to include Wayne County hotline number). See Attachment A.

- Communities, Wayne County and nested school districts
  - Train appropriate field staff to identify signs of illicit discharges and respond accordingly.
  - Require field staff to use the ADW's illicit discharge checklist to document that illicit discharges were looked for during routine MS4 maintenance activities.
  - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
  - For Priority IDEP Work Areas, notify field staff that there is an *E. coli* issue and instruct them to be especially observant and report any suspicious areas to ADW or county staff.

Measures of Assessment:

- Number of IDEP issues referred and investigations completed
- Number of illicit connections/discharges found and resolved

BMP Goals:

- Track all known illicit connections/discharges
- 100% of known illicit connections/discharges resolved, or plan in place to resolve

IDEP #7: Point of Storm Water Discharge – Dry Weather Screening
Funding: Communities and nested school districts

Activity Description: Dry weather screening of points of storm water discharge will occur in Priority IDEP Work Areas when identified as the appropriate IDEP advanced investigation technique. Dry weather screening may also occur in response to suspicious discharge complaints. Any new outfalls identified by permittees will also be screened once. A procedure for performing outfall screening was developed for use by the ADW members as part of the development of this Collaborative IDEP.

Schedule: Years 1-5 of permit for Priority IDEP Work Areas, as part of Priority Area IDEP Advanced Investigations
As needed based on complaints

ADW Member Responsibilities:

- ADW
    - Develop and distribute a consistent procedure and forms for ADW members to appropriately document dry weather screening activities (Attachment E).
    - Maintain a list of community contacts and update annually.
    - Review of reported issues at quarterly ADW Technical Committee meetings.

- Communities and nested school districts
    - Document dry weather screening inspections
    - Track status of complaints handled internally or those referred to them.
    - Track and record follow up communication from resident complaints as appropriate.
    - Investigate and resolve complaints within their MS4.
    - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
    - Perform dry weather screening of new outfalls within 6 months of construction or taking ownership.
- Wayne County
    - Provide technical guidance as requested by local communities.
    - Track the status of any pollution complaints that they investigate.
    - Track and record follow up communication regarding complaints as appropriate.
    - Investigate and resolve complaints within their MS4.
    - Perform dry weather screening of 10% of County/stream crossings using ARC/ADW dry weather screening procedures.

Measures of Assessment:

- Number of inspections
- Number of illicit discharges found/corrected

BMP Goals:

- 100% of known illicit connections/discharges resolved, or plan in place to resolve

IDEP #8: Mapping of Storm Water Outfalls to Waters of the State
Funding: ADW with Wayne County providing GIS data management

Activity Description: A watershed-wide GIS database and map of known outfalls to waters of the State is being compiled and will be maintained. A clearinghouse for ADW digital storm sewer maps will also be established. These maps will be compiled based on available GIS data from ADW members. In addition, field surveys will be performed to fill in data gaps in priority reaches, as shown in Figure 1. This activity to centralize data will be an ongoing effort that will facilitate source-tracking and ease reporting to the MDEQ overtime.

Schedule: Initial mapping completed by December 2019
Annual survey and map/database update

ADW Member Responsibilities:

- ADW/Wayne County
    - Initiate map development of centralized datasets of stormwater outfalls, discharge points and MS4 system assets based on available GIS data from ADW members. A map of outfalls to waters of the State within the ADW will be prepared.
    - Perform field surveys to GPS and fill in data gaps in outfalls to waters of the state, stormwater discharge points and MS4 system assets within IDEP priority reaches. Update centralized database and maps.
    - Update the watershed's outfall/discharge point map on an annual basis.

- Communities and Wayne County
    - Provide existing GIS datasets of storm sewer systems and points of discharge to initiate development of centralized datasets of stormwater outfalls, discharge points and MS4 system assets.
    - Update maps of outfalls/discharge points on an annual basis and provide to the ADW.

Measures of assessment:

- Portion of watershed area with known outfalls mapped in GIS

BMP Goal:

- 100% of available data from ADW members incorporated into centralized dataset

IDEP #9: Volunteer Training
Funding: ADW via Public Education and Progress Evaluation budgets

Activity Description: Participants in the various volunteer monitoring activities being implemented in the ADW have been and will be instructed and given informational materials as part of their training on how to identify and report illegal dumping and suspicious discharges. This will be carried out by Wayne County and/or HRWC staff during training for the various volunteer monitoring programs.

Schedule: Annually as volunteer monitoring training occurs.

ADW Member Responsibilities:

- ADW
    - Financially support volunteer monitoring activities
    - Provide annual volunteer training
- Communities, Wayne County and nested school districts
    - Promote citizen involvement in Volunteer monitoring efforts at which volunteers will receive training on the identification and reporting of suspicious discharges

Measures of Assessment:

- Number of volunteers trained

BMP Goal:

- Training held annually during each year of the permit cycle

IDEP #10: Method to Evaluate IDEP Effectiveness

Funding: ADW, Wayne County, communities, nested school districts

Activity Description: Records for each of the above IDEP activities will be kept and a biennial summary report submitted documenting the output of each activity and the summary number of illicit discharges identified and eliminated. Overall effectiveness will be based on the long-term natural resource response as determined through the progress evaluation monitoring described below (see Progress Evaluation Monitoring below).

Schedule: Continuous with summary report submitted biennially.

ADW Member Responsibilities:

- ADW
    - Conduct instream monitoring for select indicators to determine the effectiveness of IDEP efforts. The monitoring information will be evaluated and assessed during future priority area discussions.
    - Continue watershed-wide monitoring for select parameters to assess the general health of the river.
- Communities, Wayne County and nested school districts
    - Keep records of their activities with respect to the above IDEP activities and provide such information to ADW staff annually to assist with the collaborative reporting and IDEP effectiveness evaluation.

IV. CORRECTIVE ACTION NOTIFICATION

The procedure for responding to illicit discharges will vary depending on the nature of the discharge (ex: illicit connection to a storm sewer, failing septic system, illegal dumping, etc.) and jurisdiction of the discharge. Similarly, the timeline for eliminating a discharge will vary depending on the geographic extent of the issue, the complexity of the corrective action, responsible party's financial constraints, etc. Deviations to the procedures below may be made on a case-by-case basis and will be documented in the Permit Progress Report. In all cases, corrective action measures will be implemented to the maximum extent practicable and as soon as practicable. The status of corrective actions will be included in the Permit Progress Report to the MDEQ.

Discharges from Private Sources to MS4s

If the source of an illicit discharge has been determined to be privately owned, discharging to an MS4 and regulated by the MS4, the MS4 owner (city, village, county) will use the procedure below to notify and correct the illicit discharge.

It should be noted that discharges to drains within townships are typically under the jurisdiction of the county road agency, who is ultimately responsible for elimination. However, corrective action and enforcement for discharges to their MS4 is handled under the local jurisdiction's codes and ordinances, the county health department's sanitary code or other appropriate regulatory authority. In these situations, corrective action notification and enforcement will be led by the township, who will coordinate with the health department or other agencies, as needed.

First Notice: Notification of Problem and Correction Needed Once the source(s) of an illicit discharge has been identified, the MS4 owner will provide the first written notice to the responsible party of the illicit discharge by registered mail within 7 days. The first written notice will notify the responsible party of the illicit discharge, the MS4 owner's regulatory authority to require correction, and the potential enforcement actions if the discharge is not addressed. The responsible party will be required to contact the MS4 owner regarding plans for correction within 14 days. Tracking of all notifications and documentation of registered mail receipts shall be retained by the MS4 owner. A sample letter is included in Attachment F.

Final Notice: If 14 days have passed from the date of the 1st written notice and no response has been received from the responsible party, a second written notice will be sent. The second written notice will remind the responsible party of the illicit discharge, the prior notice, the regulatory authority to require correction, and the potential enforcement actions that will occur if the discharge is not addressed. The responsible party will be given an additional 14 days to contact the MS4 owner regarding plans for correction.

Enforcement: If 30 days have passed from the date of the first written notice, a citation will be issued. The MS4 owner will issue civil infractions as described in the Enforcement Response Procedure (ERP) for the violation of the applicable IDEP-related ordinances as listed in individual permittee stormwater management plans. A citation shall include fines and may require a court appearance.

Corrections/Repairs:

In the event that the owner does not contact the MS4 owner within 14 days of the Final Notice and/or the discharge is not addressed by the owner 30 days after civil infractions have been issued, the MS4 owner will pursue other enforcement actions such as: discontinue water service to the property and designate the property uninhabitable, place a lien on the property, and initiate efforts to complete the necessary repairs, as authorized by law.

Discharges from Public Properties to MS4s
If the discharge is emanating from a public property (other than the permittee's property), the MS4 owner will request correction or a written corrective action plan be submitted within 60 days of notification. If the discharge cannot be corrected within 60 days of notification, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water. The corrective action plan will include a schedule for completion with a goal of completion within 18 months of plan approval. The plan will be reviewed by the MS4 owner within 60 days and approved or denied with explanation. Approval of the plan will not waive any local permitting requirements of the community.

Discharges from Permittee's Properties
For discharges emanating from the permittee's own property, a corrective action plan will be developed within 60 days of discovery of the discharge. The plan will include a schedule for completion with a goal of completion within 18 months of plan completion. If the discharge cannot be corrected within 60 days of discovery, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water.

Discharges from Septic Systems
For illicit discharges from failed septic systems, the corrective action procedures of the Wayne County Health Department will be followed. This procedure is documented in the County's stormwater management plan.

V. LEGAL AUTHORITY

The legal authority that allows permittees to prohibit, investigate and/or enforce the correction of illicit discharges is established on an individual permittee basis. For most communities, legal authority is granted via the Plumbing Code, Sewer Use Ordinance, Nuisances Ordinance, and Municipal Civil Infraction Ordinance as indicated in the table below. Permittees will review their existing codes/ordinances/rules and provide a table that cross references the regulatory mechanism (chapter and section) with the items included in the table below. Table 1 provides the list of regulatory mechanisms by type of illicit discharge that are available to local, school and county agencies to investigate and eliminate illicit discharges. In some cases, permittees can seek the assistance of state and federal agencies to investigate and eliminate illicit discharges. Examples include sewage discharges from mobile home parks, discharges from non-municipal facilities that have a NPDES permit and agricultural properties as shown in Table 2.

Table 1. IDEP Regulatory Mechanisms Available to Permittees

Discharge Type or Source	Lead Enforcement Agency	Regulatory Authority
Discharges to city and village MS4s (except as noted below)	Local DPWs and Building Depts.	Varies by community. See individual stormwater management plans.
Discharges to school or township MS4s	School or Township	See individual stormwater management plans
Sanitary sewage and waste matter into County Drains	County Drain or Water Resource Commissions	Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of $25,000 or imprisonment. See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code at: http://legislature.mi.gov/doc.aspx?mcl280-423 See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: http://www.legislature.mi.gov/%28S%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&objectName=mcl-280-421
Discharges to County Road Drains	Road Agencies	Public Highways and Private Roads Act 283, 1909 Sect. 224.19b
Soil Erosion from Construction Sites	Part 91 Authority	Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994
Discharges from Onsite Sewage Disposal Systems (OSDS)	Wayne County Dept. of Health	http://www.waynecounty.com/hhs/onsitesewage.htm *Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta as follows:* -Prohibit discharges: Article III, Sec. 3.13.2 -Right to inspect: Article IV, Sec. 4.3 -Corrective action: Article IV, Sec. 4.5-4.7 -Penalties: Article XVI, Sec. 16.1 *Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance* as follows: -Right to inspect: Sec. 803 -Corrective action: Sec. 802 -Penalties: Sec. 804-815

Source: Modified from a table included in the Alliance of Rouge Communities Collaborative IDEP

Table 2 – IDEP Regulatory Mechanisms Available to State and Federal Agencies to Assist Permittees

Discharge Type or Source	State or Federal Enforcement Agency	Regulatory Authority
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987 http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-96of-1987.pdf
Discharges from Part 5 facilities and industrial NPDES regulated facilities	MDEQ-WRD	Part 31, NREPA, PA 451 of 1994
Discharges from agricultural properties and livestock facilities	MDARD	Michigan Right to Farm Act, Public Act 93 of 1981
Releases of Oil and Polluting Materials, Sewage, Flammable and Combustible Liquids, Hazardous Materials, Hazardous Substances, Infectious Substances, Hazardous Wastes, Leaking Above Ground and Underground Storage Tanks, Bulk Commercial Fertilizers and Pesticides, and Liquid Industrial Wastes	MDEQ - WRD & RRD, USEPA, USCG, NRCS, USDOT, MSP, Local Police & Fire Depts., LEPC, LARA, MDARD, Local Health Dept., and CDC	See Attachment G for appropriate regulatory authority

Notes: CDC = Center for Disease Control, LARA= Michigan Dept. of Licensing and Regulatory Affairs, LEPC=Local Emergency Planning Commission, MDA=Michigan Dept. of Agriculture & Rural Development, MDEQ WRD=Michigan Dept. of Environmental Quality Water Resources Division, MDEQ RRD= MDEQ Remediation and Redevelopment Division, MDLEG=Michigan Dept. of Labor and Economic Growth, MSP=Michigan State Police, NRCS=Natural Resources Conservation Service, USCG=US Coast Guard, USDOT=US Dept. of Transportation, USEPA=US Environmental Protection Agency.
Source: Oakland County Water Resources Commissioner's Office

Attachment A

STORMWATER DISCHARGE PERMIT APPLICATION

Complaint Tracking Form & Routine Field Work Log

For the Alliance of Downriver Watersheds MS4s

Revised 6/01/2018

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Community Name: _____

Complaint made by: _____ Phone #: _____

Date:_____ Time: _____

Location of Problem: _____

Offending Party (if known) _____

Nature of Problem (i.e. paper waste, odor, color, etc.):

_____

_____

_____

Is this an Emergency? ☐ No ☐ Yes (then call 911)

Nature of Emergency: _____

Initial contact made to: ☐ 911 ☐ City Dept _____

☐ Wayne County 888-223-2363 ☐ PEAS Hotline (State) 800-292-4706

☐ Other _____

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Investigation Summary ☐ Initial Investigation ☐ Follow-up Investigation

Date of Investigation:_____ Investigating Agency: _____

Crew Members _____

Location of Discharge: _____

Investigation Location: _____

Observations (odor, color, volume, etc.): _____

_____

_____

_____

Actions Taken (dye testing, notification letter, etc.): _____

_____

_____

Were photos taken? ☐ No ☐ Yes

Agency Referred to: _____ Agency Contact: _____

Method of Communication: ☐ E-mail* ☐ Letter/memo* ☐ Phone *Attached copies

Content of Communication: _____

_____

Date Corrected or Resolved: _____

Routine Fieldwork Log – Illicit Discharge Elimination Program
Wayne County 24 hr Environmental Hotline 1-888-223-2363

Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		

* If "Yes" is checked, the Pollution Complaint Tracking Form must be completed

Attachment B

STORMWATER DISCHARGE PERMIT APPLICATION

Advanced Investigation Procedure for Locating the Source of Suspicious Discharges

For the Alliance of Downriver Watersheds MS4s

Revised 12/18/2018

Attachment B

I. Purpose

The purpose of this procedure is to describe the protocols to conduct advanced investigations in storm sewer systems to identify the source of a suspicious discharge. These investigations would be performed based on the priority area designation, results of field screening procedures or based on a pollution complaint. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

II. Performing Source Investigations

The investigation parameters will be selected based on the nature of the complaint or initial field screening results according to the parameters and threshold values indicated in the Field Screening Procedure for Identifying Potential Illicit Discharges Standard Operating Procedure. If working within a river/stream/open drain, then samples or observations will be taken at the origin of the suspicious discharge and at upstream locations. This will continue until the source is found or an enclosed storm sewer is located.

Determining Ownership

For complaint-based investigations, the owner/operator of the enclosed storm sewer will be determined. If it is suspected that a discharge originates from another jurisdiction, the other jurisdiction will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within 10 working days of the discovery of the discharge from the other jurisdiction.

For investigations based on outfall screening results, the ownership step is not required because it is assumed that outfall screening was completed by the owner/operator.
For investigations based on instream sampling results and the owner/operator is participating in the ADW Collaborative IDEP Plan, the owner/operator will be notified of the suspicious discharge and storm and sanitary sewer maps will be obtained. Investigations will continue with the assistance of the owner/operator. If the owner/operator is not participating in the ADW Collaborative IDEP Plan, then they will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within a timeframe ranging from immediately/within 24 hours (for sources posing an imminent threat) or for non-emergency issues up to 5 working days of the discovery of the discharge from the other jurisdiction.

Source Investigations

Enclosed drain investigations will proceed, following discovery of a suspicious discharge. The site of the discharge will be resampled during dry conditions for the appropriate indicator parameter. The sample parameters will be the same as those used during the initial field screening. If no flow is present, a second site visit will be conducted within 4 weeks of discovery, weather permitting. If no flow is present during the second site, a third site visit will be conducted within 2 months of the date of the second visit, weather permitting.

Additional sampling/observations will be conducted upstream within the drainage system to narrow down the section of pipe from which the suspicious discharge is emanating. Sampling will be conducted as outlined in the Field Screening Procedure for Identifying Potential Illicit Discharges SOP.

Ideally, the sampling data or observations will allow staff to isolate a section of storm sewer to employ advanced investigation techniques. These techniques include televising the storm sewer, smoke testing, and conducting dye testing of homes, facilities, or sewers to verify a suspected illicit connection or discharge. The lead investigator will determine which of these techniques (or other technique) will be employed.

III. Closed Circuit Televising (CCTV)

CCTV inspections may be performed to determine if illicit connections are present in a storm drain. This allows for inspectors to identify suspicious taps to the drain. This work will be performed by a qualified staff or contractor. If possible, a video recording of the inspection will be performed. If possible, the lead investigator will be present during the CCTV inspection in order to direct additional efforts.

IV. Smoke Testing

Smoke testing may be performed to determine if a residence or facility is illicitly connected to the storm drain. This work will be performed by a qualified staff or contractor. This testing requires homeowner notification to ensure all plumbing traps are filled with water and to make them aware of the potential intrusion of smoke into their homes. The local fire department should also be notified prior to testing. Non-toxic smoke is used. The drain may be plugged at various locations to ensure the testing is limited to the area of interest. Smoke found exiting a building plumbing vent indicates that the home is illicitly connected to the storm sewer. Care must be taken to perform this testing during the appropriate weather conditions in order not to mistaken steam from a heating system or fog as smoke. This testing may also identify improper connections between the storm and sanitary system.

V. Dye Testing

Dye testing may be performed on plumbing fixtures (i.e. sinks, toilets, floor drains, etc.) within facilities/structures that are suspected of illicitly discharging non-stormwater flows into the MS4 to determine if they are properly connected to the appropriate sewer. Prior to administering a tracer dye, the lead investigator will submit a Notice of Intent to the MDEQ under General Rule 97 Certification of Approval Authorizing Tracer Dyes in Surface Waters. In addition, the following agencies shall be notified 48 hours prior to the application:

- Local Municipality
- Local Health Department
- Downstream Municipalities and Health Departments potentially affected
- Local Fire Department

Once approved, tracer dye will be applied to the appropriate plumbing fixture(s) per the manufacturer's recommendations and in a manner that will minimize potential effects to surface water. The following information will be documented when conducting a dye test:

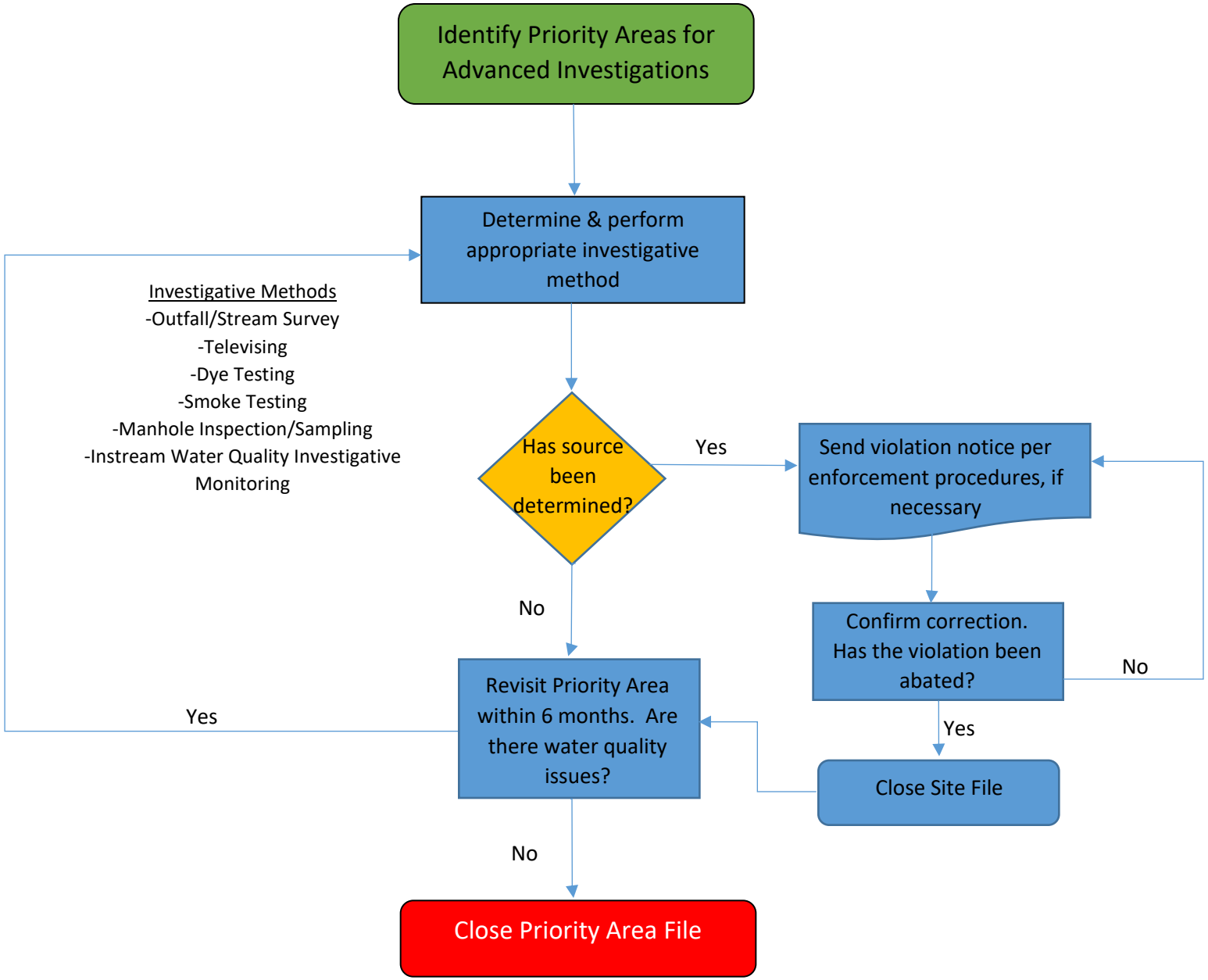
- Facility or Building Name
- Date
- Location where dye is applied (i.e. second floor men's restroom)
- Time the dye is applied
- Time dye is observed in the field

- Location where dye is observed (i.e. sanitary manhole, northeast of building)
- Time of Travel
- Follow up action, if needed

Sample dye test forms are included with this Attachment.

VI. Process for Revision

Any questions on this procedure should be directed to the entity's Stormwater Manager or the ADW Technical Committee. This procedure shall be reviewed once per permit cycle by the ADW Technical Committee for any updates.


Identify Priority Areas for Advanced Investigations
Determine & perform appropriate investigative method
Investigative Methods
-Outfall/Stream Survey
-Televising
-Dye Testing
-Smoke Testing
-Manhole Inspection/Sampling
-Instream Water Quality Investigative Monitoring
Has source been determined?
Yes
Send violation notice per enforcement procedures, if necessary
Confirm correction. Has the violation been abated?
No
Yes
Close Site File
No
Revisit Priority Area within 6 months. Are there water quality issues?
Yes
No
Close Priority Area File

Alliance of Downriver Watersheds

Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division

Facility Information Sheet

❒ Field Inspection ❒ Survey ❒ WMD Complaint, #_____

Date:_____

Address: _____ Community: _____

Name of Facility: _____

Type of Business: _____

Contact Person: _____ Phone Number: _____

Title: _____

SIC Code: _____ Priority: _____

Watershed: _____ Subwatershed: _____ Subarea: _____

Field Representative(s): _____

River Friendly Partners Program Information Requested: _____

Alliance of Downriver Watersheds

Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division

Field Inspection Results

Date: _____

Address: _____ Community: _

Name of Facility: _____

- ☐ Proper Connection - The Fixtures "dye tested" in this establishment have been found to be properly connected to the sanitary sewer system. No problems were noticed at time of inspection.
- ☐ Incomplete: _____
  reason
- ☐ No Show - Unsuccessful attempt, unable to detect "dye" in the sanitary sewer.
- ☐ Violation/Illicit Connection/Improper discharge - Situation resulting in pollution of surface waters.
  - ☐ Illicit Connection
  - ☐ Improper Discharge
  - ☐ House Keeping

LIST ALL FIXTURES DYE TESTED:

_____

_____

_____

_____

_____

_____

Field Inspection Results

Date _____

Facility: _____

Information to Document:

- Location where dye is applied (i.e. second floor men's restroom)
- Time the dye is applied
- Time dye is observed in the field
- Location where dye is observed (i.e. sanitary manhole, northeast of building)
- Time of Travel
- Follow up action, if needed

Alliance of Downriver Watersheds

Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division

Field Notes & Observations

Date: _____ Complaint Number: _____

Address: _____ Community: _____

Name of Facility: _____

❒ Follow Up Inspection ❒ Survey ❒ Complaint

Notes: _____

Alliance of Downriver Watersheds

Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division

Plan Sheet

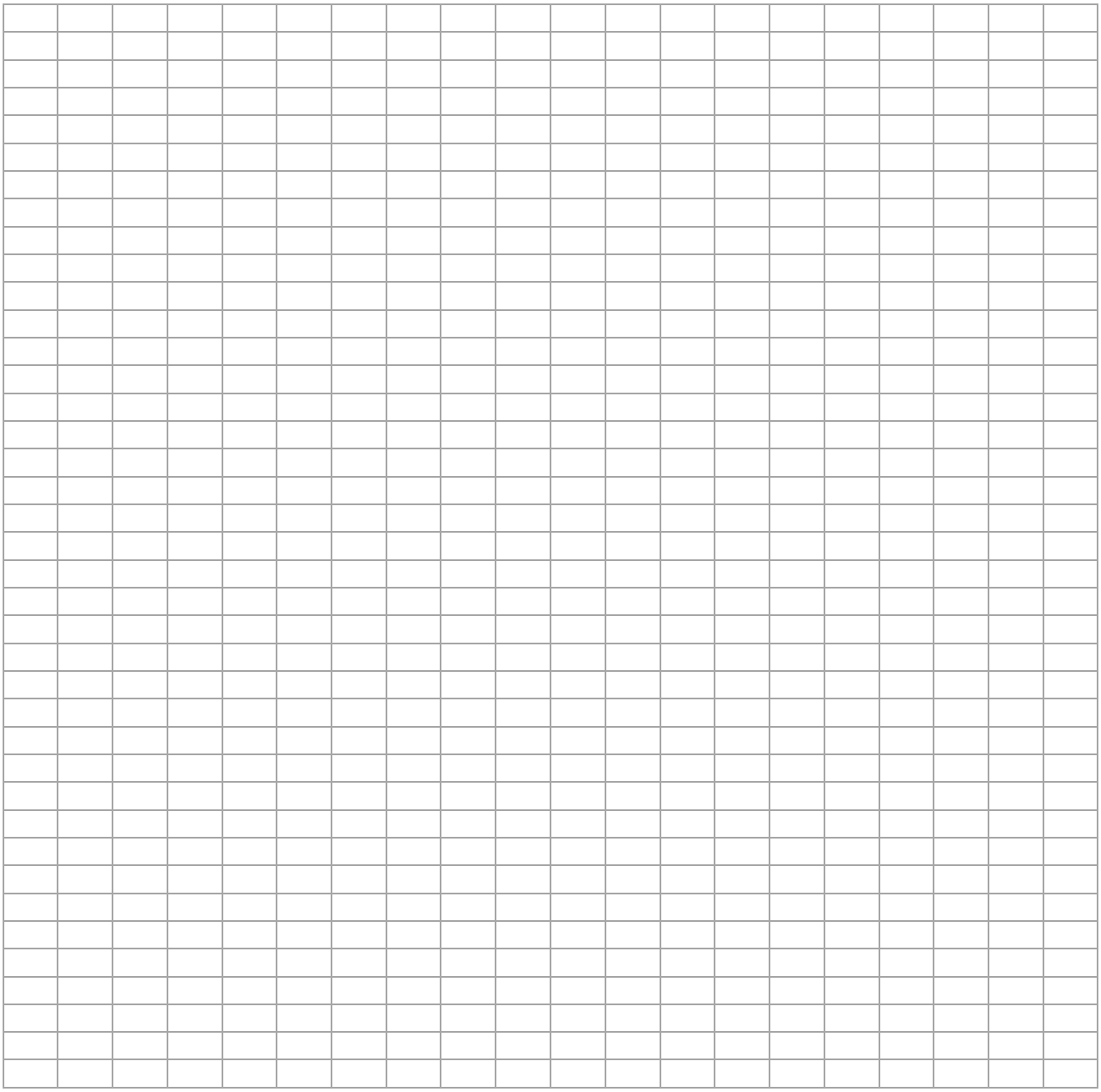
Date: _____

Address: _____Community: _____

Name of Facility: _____

❑ Field Inspection ❑ Survey ❑ Complaint

Indicate manhole location



Attachment C

STORMWATER DISCHARGE PERMIT APPLICATION

Regional IDEP Training Program

For the Alliance of Downriver Watersheds MS4s

Southeast Michigan Regional
Illicit Discharge Elimination Program Training Plan
February 19, 2013

Introduction

Southeast Michigan is a seven county region with a population exceeding 4.7 million and comprising 16 watersheds. Five of the counties (Wayne, Washtenaw, St. Clair, Macomb and Oakland), comprising 11 watersheds, have a stormwater discharge permit. The permit requires training in various aspects of illicit discharge elimination. Recent audits of permittees by the Michigan Department of Environmental Quality have requested documentation of such training. This document lays out a plan for training municipal staff that is consistent with the language in the forth coming stormwater permit. The plan provides background information, objectives, details, and a cost-share arrangement to provide stormwater-related training to the permitted communities.

Background

The Alliance of Rouge Communities (ARC) has sponsored the Basic/Advanced IDEP Training for the last few years. This training was made available to ARC members without charge. The participation in the training has decreased over the years. Wayne County has provided training to non-ARC members in southeast Michigan on a cost recovery basis, e.g. contracts with Eastern Michigan University, Washtenaw County.

In 2011, SEMCOG sponsored five municipal training sessions across Southeast Michigan that targeted pollution prevention actions at municipal facilities. These ½ day sessions also included an illicit discharge identification component designed to educate a broad audience on basic recognition and reporting techniques. Staff from Washtenaw, Livingston, St. Clair, Oakland, Macomb and Wayne counties helped to develop the content of the training and co-host the session at one of their facilities. The sessions were also co-hosted by the DEQ, which provided Industrial Operator Training at no cost in the afternoon of each session. Over 350 people attended the five training sessions and 107 people took the DEQ Industrial Operator.

Objective

The goal of this plan is to provide training to the southeast Michigan region focused on illicit discharge elimination and storm water pollution prevention. There are three main objectives of this plan. The first objective is to establish a framework that shares responsibility and costs of training on a regional basis. The second objective is to be efficient by maximizing class size not duplicating efforts and spreading the costs over the region. The third objective is to make it unnecessary to charge a fee for the training.

Plan

The plan calls for an alternating five year schedule of training between Wayne County's IDEP training program and SEMCOG's municipal facility training and illicit discharge recognition training provided by the host county. The training would be provided once a year. The period covered by this plan is January 2013 through December 2017.

Every other year beginning with 2013, Wayne County's IDEP Training will be provided to the region. Table 1 lists the responsibilities and schedule for each IDEP training session. In 2014 and 2016, SEMCOG's municipal facility training with illicit discharge recognition training will be provided. Table 2 lists the responsibilities for the SEMCOG municipal facility and illicit discharge recognition training.

Note: This schedule is consistent with the language concerning training in the new State stormwater permit.

Cost Sharing

The goal is to distribute cost among the region by rotating sites for the training, so that the trainings can be offered at no charge. This would reduce the cost to the ARC since the IDEP training registration would be handled by others and since it would be offered every other year. This will also reduce the cost to other permittees, since the IDEP training charge would be offered at no charge (a savings of around $75 per attendee).

Table 1: Traditional IDEP Training Schedule and Responsibilities

Year	Staff Cost[1]	Facility/Refreshments[2]	Registration[3]	Print and Mail Certificates
2013	ADW, ARC	Wayne County	Wayne County	Wayne County
2015	ADW, ARC	Washtenaw County	Washtenaw County	Wayne County
2017	ADW, ARC	Macomb County	Macomb County	Wayne County

1- Will provide trainers for the event at no charge to the municipalities or other counties.
2- Will arrange for a training location and provide refreshments/snack
3- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

Table 2: SEMCOG Municipal Facility and Illicit Discharge Training Schedule and Responsibilities

Year	Staff Cost	Facility/Refreshments[3]	Registration[4]
2014	Host County[1], SEMCOG[2]	St. Clair County	SEMCOG
2016	Host County[1], SEMCOG[2]	Oakland County	SEMCOG

1- Will provide or arrange for trainers for the event in collaboration with SEMCOG.
2- SEMCOG donated time
3- Will arrange for a training location and provide refreshments/snack
4- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

W Mistenovich — W. MISTENOVICH, CHIEF DEPUTY MACOMB COUNTY PUBLIC WORKS COMMISSIONER — 05-17-2013

Signature — Name/Title — Date

Oakland County Representative

James A. Winka — JAMES WINEKA / ASST. CHIEF ENG. — 4/17/13

Signature — Name/Title — Date

Saint Clair County Representative

Steve Frank — Environmental Health Director — 4.29.13

Signature — Name/Tile — Date

Washtenaw County Representative

Evan Pratt — EVAN PRATT, Water Resources Commissioner — 5/8/12

Signature — Name/Title — Date

Wayne County Representative

Kelly A Cave — KELLY A CAVE, WAYNE CO STORM WATER COORDINATOR — 11 APRIL 13

Signature — Name/Title — Date

SEMCOG Representative

Kathleen Lomalco — Kathleen Lomalco — 8/14/2013

Signature — Name/Title — Date

Alliance of Rouge Communities Representative

Kevin L. Buford — Kevin Buford, ARC Chair — 3/28/13

Signature — Name/Title — Date

Alliance of Downriver Watersheds Representative

Mark Gahry — Mark Gahry, Chairman — May 7, 2013

Signature — Name/Title — Date

Attachment D

STORMWATER DISCHARGE PERMIT APPLICATION

ADW Member Facilities
To be Dye-Tested

For the Alliance of Downriver Watersheds MS4s

02/15/2018

ATTACHMENT D

Community	Facilities
Allen Park	Library
	Parks and Rec
	Fire Station
	DPS Building
Belleville	Belleville Fire Department
	Public Golf Courses
Dearborn Heights	No facilities left to test
Ecorse	No facilities in ADW to test
Flat Rock	Animal Shelter
	City Hall
	DPS Mechanic's Garage
	DPS Yard
	Fire Department
	Police Station
	Library
Gibraltar	Community Center - Annex
	School District Transportation & Maintenance Garage with salt storage
	DPW Building
	Carlson High School/Shumate Middle School
	Parsons Elementary School
Grosse Ile	Animal Shelter
	Water's Edge Municipal Golf Course
	DPS Building & Yard
	Recreation/Restaurant Building
	Grosse Ile Township Schools
	Grosse Ile High School
	Grosse Ile Middle School
	Meridian Elementary School
	Parke Lane Elementary School
Inkster	No facilities in ADW to test
Lincoln Park	Historical Museum
	Animal Control
Melvindale	Melvindale Library: 18650 Allen Rd (City reports already dye tested - confirm)
Riverview	Riverview Highland Golf Course Maintenance
	DPW Facility
	Fire Hall
	Forest Elementary School
	Huntington Elementary
	Kennebec Park
	Kingswood Nature Park
	Memorial Elementary
	Riverview High School
	Riverview Schools Operations Building
	Riverview Schools Warehouse
	Seitz Middle School
	GSRP Preschool
Rockwood	Municipal Building (includes Fire & Police Stations)
	Public Works & Salt Storage
	Community Center
Romulus	Animal Shelter
	Romulus Athletic Center
	Romulus Community Schools
	Romulus Elementary School
	Barth Elementary School
	Romulus Senior High School
	Wick Elementary School
	Hale Creek Elementary School
	Romulus Middle School
	Romulus Virtual Learning Center
Southgate	Downriver Animal Control Building
	Southgate Municipal Golf Course
Sumpter Twp	no facilities list
Taylor	Fire Station (Goddard)
	Fire Station (Eureka)
	Lakes of Taylor Golf Course
	Library
	Kinyon Elementary School
	Taylor School District
	Blair Moody Elementary School
	Taylor Parks Elementary School
	Robert J. West Middle School
	Clarence Randall Elem. School
	Bernice McDowell Elem. School
	Holland Elementary School
	Myers Elementary School
	Taylor Virtual Learning Academy
	Eureka Heights Elementary School
	Hoover Middle School
	Taylor High School
	Johnson Preschool
	Taylor SportsPlex
Van Buren	No facilities in ADW to test
Westland	No facilities in ADW to test
Woodhaven	Civic Center
	Animal Shelter
	City Hall
	DPW Yard
	Fire Station 1
	Fire Station 2
	Police Station
	Water Garage
Woodhaven - Brownstown Schools	No facilities left to test
Wyandotte	Recreation Center/Yack Arena
	Police Station
	Wyandotte Animal Pound
	Fire Station #1
	Fire Station #2
	Public Schools Wilson Middle School
	DPW Yard

Attachment E

STORMWATER DISCHARGE PERMIT APPLICATION

Outfall Screening Procedure for Identifying Potential Illicit Discharges

For the Alliance of Downriver Watersheds MS4s

Revised 12/13/2018

Attachment E

I. Purpose

The purpose of this procedure is to describe the protocols to inspect stormwater outfalls for the presence of illicit discharges. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

II. Performing Field Observations at Outfalls

Outfalls will be assessed during dry weather conditions focusing on the criteria listed below. This assessment will be conducted following at least 48 hours with no precipitation.

1. Presence/absence of flow
2. Deposits/stains on the discharge structure or bank
3. Vegetation condition
4. Structural condition
5. Biology, such as bacterial sheens, algae, and slimes
6. Water clarity
7. Color
8. Odor
9. Floatable materials

A field form (provided at the end of this procedure) that documents the condition of the outfall and any discharge will be completed. In addition to the assessment of the field screening criteria, GPS positioning will be obtained for new or previously unscreened outfalls.

III. Performing Field Screening

Only individuals that have been trained to do so will perform field screening activities. Acceptable training includes the following elements: goals of the IDEP program, how to recognize illicit discharges and sampling techniques. Four months of IDEP field experience consisting of outfall screening and/or advanced investigations can be substituted for classroom training.

If the visual observations indicate a potential illicit discharge, flow is observed and the source of the flow is not immediately identifiable then sampling will be performed. Based on the suspected discharge or the pollutant of concern, some or all of the following parameters will be assessed:

1. pH will be sampled if an industrial discharge is suspected. A pH measurement will be obtained using calibrated portable field meter such as pH pen or multi-parameter probe.
2. Detergents will be sampled if flow is observed to have foam or suds or if a sanitary discharge is suspected. The sample will be field screened for surfactants using a colormetric method such as CHEMets kit # K-9400 (www.chemetrics.com). The operating range of the test should be between 0 and 3 mg/L.
3. *E. coli* will be sampled if a sanitary discharge is suspected. These samples will be collected in a sterile 100 mL bottle, stored on ice, and transported to a laboratory for analysis. The analytical range should be between 10 and approximately 24,000 colonies/100 mL. Care should be taken not to disturb any accumulated sediment when collecting the *E. coli* sample.
4. Other parameters – Additional samples may be collected depending on the suspected source.

Disposable gloves will be worn to collect all samples. Gloves will be changed out between sampling sites. *E. coli* samples must be collected directly into the laboratory container, while sample collection cups may be used for pH and surfactants. Decontamination procedures for reusable sample collection containers consists of a triple rinsed with site water prior to taking a measurement.

E. coli samples shall be delivered to the laboratory with sufficient time for the samples to be analyzed within the method specific hold time. Confirmation of method specific hold times shall be obtained from the laboratory at the onset of sampling efforts. For *E. coli* analysis, the goal of the sampling team will be to deliver samples to the laboratory within 6 hours of collection where sample processing will occur within 2 hours for a total hold time of 8 hours. However, as these samples are intended to be used for screening purposes, a total hold time of 24 hours will be acceptable if it is not cost effective to meet the shorter hold time.

If sample result exceeds the threshold(s) provided in Table 1, additional investigations are recommended to locate the source of the suspicious discharge.

Field screenings will be conducted in conjunction with field observation procedures as described in Section II. Screenings may also be conducted on an as needed basis if suspicious discharges are discovered by field staff during day-to-day operations, or if a pollution complaint or referral is received from the public or other agencies.

Table 1 – Guidance for Screening Results

Typical Parameters	
Parameter	**Follow-up Threshold**
pH	>9 or <6.5
Surfactants	>0.75 mg/L
E. coli	>1,000 cfu/100 mL or MPN/100 mL resampled up to two more times within 12 months
	>5,000 cfu/100 mL or MPN/100 mL for advanced investigations
Physical signs	unusual odor, color, clarity, floatables, deposits, stains, vegetation change, outfall structural damage
Additional Parameters	
Parameter	**Follow-up Threshold**
Ammonia	>1 mg/L
Conductivity	>1,000 uS/cm
Turbidity	>5 NTU
TDS	>500 mg/L
Dissolved oxygen	< 5 mg/L
Temperature	+5°F warm water stream +2°F cold water stream

IV. Process for Revision

Any questions on this procedure should be directed to the entity's Stormwater Manager. This procedure shall be reviewed once per permit cycle by the ADW Technical Committee.

Outfall ID:						Community:				
Section 1: BACKGROUND DATA										
Date:			Time:			Inspector:				
Weather:	☐	48 hrs no rain	☐	Sunny	☐	Cloudy	☐	Partly Cloudy	☐	Rainy	☐	Winter Inspection
Photos Taken:						Receving Water:				
Nearest Property Address/Location Description:										
Land Use:	☐	Commercial	☐	Industrial	☐	Residential	☐	Other_____		
Section 2: OUTLET DESCRIPTION										
	Size (in) Width/Height or Diameter:									
	Type/Shape	☐	Round	☐	Arch	☐	Box	☐	Other_____	
Type/Shape/Size	Material:	☐	RCP	☐	PVC	☐	CMP	☐	Concrete	☐	Other_____
	In Water:	☐	No	☐	Partially	☐	Fully			
Submerged	In Sediment:	☐	No	☐	Partially	☐	Fully			
	☐	Yes	☐	Spalling/	☐	Corrosion	☐	Other_____		
Outfall Damage	☐	No								
	☐	Yes	☐	Oily	☐	Flow Line	☐	Paint	☐	Other_____
Deposits/Stains	☐	No								
Turbid/Cloudy Plunge	☐	Yes	☐	Odors	☐	Floatables	☐	Color	☐	Other_____
Pool Below Outlet	☐	No	☐	Oil Sheen	☐	Suds	☐	Excessive Algae		
	☐	Yes	☐	Trickle	☐	Moderate	☐	Substantial		
Flow Present?	☐	No								
Section 3: PHYSICAL INDICATORS FOR OUTFALLS WITH WATER										
	☐	Sewage	☐	Sulfide	☐	Oil/Gas	☐	Other_____		
Odor of Water	☐	None	☐	Rancid/Sour						
					☐	Dark				
Color of Water:	☐	Clear	☐	Cloudy	Brown/ Tannic		☐	Muddy	☐	Other_____
			☐	Petroleum						
Floatables (not	☐	Paint	(oil sheen)		☐	Algae	☐	Other_____		
including trash)	☐	None	☐	Sewage	☐	Suds/bubbles				
	☐	Glass	☐	Yard Waste	☐	Paper	☐	Plastics		
Trash/debris	☐	None	☐	Mixed Mate	☐	Metal	☐	Other_____		
Sample Obtained	☐	Yes	☐	No						
Section 4: PRIMARY SCREENING/SAMPLES COLLECTED										
Screening Parameters	Result		Possible Illicit Discharge?				Equipment			
pH			☐	Yes	☐	No				
Temperature (F)			☐	Yes	☐	No				
Conductivity (μS/cm)			☐	Yes	☐	No				
Ammonia (ppm)			☐	Yes	☐	No				
Detergents (ppm)			☐	Yes	☐	No				
Section 5: ILLICIT DISCHARGE POTENTIAL										
Do the screening results above indicate that an illicit discharge may be present?										
☐ Yes ☐ No										
Section 6: NOTES										

Attachment F

STORMWATER DISCHARGE PERMIT APPLICATION

Corrective Action Notification Sample Letter

For the Alliance of Downriver Watersheds MS4s

12/18/2018

Attachment F

NOTICE OF ILLEGAL DISCHARGE OR CONNECTION
SAMPLE LETTER

<Person or Business Name>
<Address Line 1>
<Address Line 2>

Dear <Property Owner>:

The Michigan Department of Environmental Quality (MDEQ) Municipal Separate Storm Sewer System Permit requires the <CVT> to control the amount of pollutants entering the drainage system. This includes the detection and elimination of illegal discharges or connections to the system that may contain pollutants or are otherwise not allowed. Left uncorrected, any pollutants entering the system will ultimately impact nearby lakes or streams as storm drainage is not treated at any sort of treatment facility. Any discharge/connection without permission is illegal and requires immediate termination of the discharge.

An inspection of the drainage system has occurred in the vicinity of your property and an illegal connection/discharge was discovered entering into the <CVT> system. The discharge/connection was discovered on <date> at <business name and address>. <Description of indicators or source>.

This discharge directly pollutes the surface waters of the State of Michigan. This is a violation of the Federal Clean Water Act, PL 92-500, as amended, State of Michigan Natural Resources and Environmental Protect Act 451, Public Act of 1994, as amended, Part 31, and the Michigan Department of Environmental Quality NPDES Storm Water General Permit (MIG610000). Please contact me within 14 days to report plans for correction of the violation.

A follow-up investigation will be conducted to ensure compliance. If the illegal discharge/connection cannot be removed immediately, you do not understand this notice, or you disagree that an illegal discharge/connection exists at your property, please contact me with further details or explanation by calling <phone number> or via email at <email address>.

Sincerely,

<Name>
<Title>

Attachment G

STORMWATER DISCHARGE PERMIT APPLICATION

State and Federal Regulatory Mechanisms

For the Alliance of Downriver Watersheds MS4s

12/18/2018

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	**Reporting Criteria**	**Initial Notification**	**Written Follow-up Report**	**Notes**
SARA Title III Section 304 40 CFR 355.40 (**EHS & Hazardous Substances**)	Release of a CERCLA **hazardous** substance (40 CFR 302, Table 302.4) or **Extremely Hazardous** Substance (EHS) (40 CFR 355, Appendix A) from a facility (all buildings, equipment, etc. located on a single site or adjacent sites owned or operated by the same person) at which a hazardous chemical (as defined under 29 CFR 1910.1200(c)) is used, produced or stored (including motor vehicles, rolling stock, and aircraft) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hr period that migrates beyond the facility boundaries. Includes continuous release reportable under CERCLA Section 103. Excludes release that is federally permitted or that results in exposure to persons solely within the boundaries of the facility. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA. Excludes release < 1000 lbs of NOx released to the air from combustion or combustion-related activities.	Immediate (within 15 minutes after discovery): to LEPC(s) of any area(s) potentially affected, and SERC (DEQ PEAS line accepts notification on behalf of SERC) by owner or operator. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release. See 73 FR 76948 (12/18/08): Only CAFOs are required to report continuous releases to the air from animal waste. Transportation related releases can be reported to 911.	As soon as practicable (within 30 days) after release: to LEPC(s) and SERC. Not required for releases that occur during transportation or from storage incident to transportation. For continuous releases: Initial written within 30 days after initial telephone notification: to LEPC(s) and SERC. Michigan SARA Title III Program accepts reports on behalf of the SERC.	PEAS: 800-292-4706 Contact your LEPC for a phone number to report releases. Call 911 if your LEPC is not active. For further information & LEPC contact information, contact Michigan SARA Title III Program 517-284-7272
CERCLA Section 103 40 CFR 302 (**Hazardous Substances**)	Release into the environment of a CERCLA **hazardous** substance (40 CFR 302, Table 302.4) or hazardous constituent in a mixture or solution (including hazardous waste streams) from a vessel or facility (any building, structure, etc. including motor vehicles, rolling stock, aircraft, pipe, pipeline, well, pond, lagoon, impoundment, ditch, landfill, or site where a hazardous substance has come to be located) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hour period. Excludes petroleum, including oil, or any fraction thereof. See 40 CFR 302.6 for notification requirements for radionuclide releases. Includes continuous release: occurs without interruption or abatement or that is routine, anticipated, and intermittent and incidental to normal operations or treatment processes. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. See 71 FR 58525 (10/4/06) re Exemption for NOx releases to the air of < 1000 lbs from combustion or combustion-related activities. Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.	Immediate (within 15 minutes after discovery): to NRC by person in charge of vessel or offshore or onshore facility. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release. See 73 FR 76948 (12/18/08) re Exemption from reporting continuous releases to the air from animal waste.	For continuous releases only: Initial written within 30 days after initial telephone notification & Follow-up within 30 days of first anniversary of initial written notification: to EPA Region 5.	NRC 800-424-8802 or online at **www.nrc.uscg.mil** For further information contact Michigan SARA Title III Program 517-284-7272 or EPA's Superfund, TRI, EPCRA, RMP, and Oil Information Center 800-424-9346

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.
*****This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations**.
Additional reporting requirements might be found **in permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 201, **Environmental Remediation**	(i) Unpermitted release into the environment over a 24-hour period of a **hazardous** substance (*July 1, 2012, edition* of the CERCLA list, 40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity. Does not include release solely from UST systems regulated under Part 213, and release solely from disposal area licensed under Part 115 and discovered through disposal area's hydrogeological monitoring plan. Release of substance regulated by MI Dept of Agriculture & Rural Development (MDARD) (fertilizer, soil conditioner, or pesticide) excluding normal agricultural practices: *also* report to MDARD.	Within 24 hours after discovery: to DEQ-RRD district office (PEAS after hours) by owner or operator or person holding easement interest. Report agricultural release to MDARD.	Upon request: Provide a response activity plan to DEQ-RRD district supervisor.	PEAS: 800-292-4706 MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 For further information contact DEQ-RRD
NREPA 1994 PA 451 Part 201, **Environmental Remediation** (Continued)	(ii) The owner or operator has reason to believe that one or more **hazardous** substances are migrating or have migrated from his or her property and are present beyond the property boundary at a concentration in excess of cleanup criteria for unrestricted residential use. (iii) The release is a result of an activity that is subject to permitting under NREPA Part 615 and the owner or operator is not the owner of the surface property and the release results in **hazardous** substance concentrations in excess of cleanup criteria for unrestricted residential use. Hazardous substance means a hazardous substance defined in CERCLA (40 CFR 302), hazardous waste as defined in NREPA part 111, petroleum as defined in NREPA part 213, or any substance demonstrated to pose an unacceptable risk to public health, safety, welfare, or the environment. Cleanup criteria for unrestricted residential use means criteria that satisfy the requirements in section 20120a(1)(a) or (16); or as defined under NREPA part 213.	Within 30 days after discovery: to DEQ-RRD district office and owners of property to which hazardous substances migrated or owner of surface property by owner or operator of property where release occurred. Specific form required for: "Notice of Migration of Contamination" (Form EQP4482).	Upon request: Provide a response activity plan to DEQ-RRD district supervisor.	For further information contact DEQ-RRD
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (**Agricultural**)	Release to the environment of a commercial **pesticide** >5 gallons or 100 pounds. Reportable agrichemical spills as defined in the provisions of SARA Title III section 304 and CERCLA section 103 shall be immediately reported to PEAS and the NRC. The term "release" excludes normal agricultural practices.	Immediate: to PEAS* Also notify NRC for spills reportable under SARA Title III & CERCLA. *MDARD prefers direct notification to their hotline. PEAS forwards all agriculture calls to MDARD.	Within 90 days: to MDARD Pesticide and Plant Pest Management Div. a revised site plan.	MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 PEAS: 800-292-4706 NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact MDARD 517-284-5644

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	**Reporting Criteria**	**Initial Notification**	**Written Follow-up Report**	**Notes**
NREPA 1994 PA 451 Part 85, Fertilizers Regulation 641 Commercial Fertilizer Bulk Storage Regulation 642, On Farm Fertilizer Bulk Storage (**Agricultural**)	Release to the environment of a commercial **fertilizer** >55 gallons liquid or 650 pounds dry, or tank overfills; or an on farm fertilizer > 55 gallons liquid. For storage tank with bladder system instead of diking: also report all overfills and internal spills. The term "release" excludes normal agricultural practices. The term "liquid fertilizer" excludes anhydrous ammonia.	Immediate: to MDARD by commercial bulk storage facility personnel (For farms, the regulation does not specify who makes the report.)	Not required.	MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 For further information contact MDARD 517-284-5644
Fire Prevention Code 1941 PA 207 Section 29.5g	A fire, explosion, spill, leak, accident, or related occurrence that involves the transportation, storage, handling, sale, use, or processing of hazardous material by a firm, person, or vehicle. **Hazardous** material = explosives, pyrotechnics, flammable gas, flammable compressed gas, flammable liquid, nonflammable compressed gas, combustible liquid, oxidizing material, poisonous gas or liquid, LPG, or irritating, etiologic, radioactive, or corrosive material. Act 207 amended 6/19/2006. The State Fire Marshall is in LARA, Bureau of Fire Services.	Immediately following incident, report known details regarding incident: to LARA Bureau of Fire Services *and* organized local fire department by owner of firm or vehicle or the person *and* the chief of first police or organized fire dept upon scene of incident.	Not required.	Contact LARA Bureau of Fire Services by calling the MSP HazMat hotline: 800-525-5555 For further information: contact local fire department
Fire Prevention Code 1941 PA 207 Part 2 of Storage and Handling of Flammable and Combustible Liquids rules (FL/CL code)	A release from an **AST** system of > 55 gal of any **flammable or combustible liquid** (flash point < 200°F) to the ground or within a secondary containment area during any 24 hour period. Note: Many liquid pesticides are combustible (flash point between 100 and 200°F).	As soon as practicable after detection of release: to PEAS by owner or operator.	Within 10 days after release: to LARA Bureau of Fire Services, Storage Tank Division outlining cause, discovery, response to prevent recurrence.	PEAS: 800-292-4706 For further information: contact LARA Bureau of Fire Services, Storage Tank Division 517-335-7211

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.
*****This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations**.
Additional reporting requirements might be found **in permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 171 (**Transportation of Hazardous Materials**)	Initial verbal notice: Incident during transportation (including loading, unloading, temporary storage) involving (1) **hazardous** material and resulting in death, injury requiring hospitalization, public evacuation ≥ 1 hour, major transportation artery or facility closure ≥ 1 hour, or flight pattern alteration; (2) fire, breakage, spillage, or suspected radioactive contamination occurs involving a **radioactive** material; (3) fire, breakage, spillage or suspected contamination involving an **infectious** substance other than a regulated medical waste; (4) **marine pollutant** release exceeding 450 L (119 gal) liquid or 400 kg (882 lbs) solid; (5) other per judgment of person in possession of the hazardous material (e.g., continuing danger to life exists at scene of incident); (6) during transportation by aircraft, a fire, violent rupture, explosion or dangerous evolution of heat occurs as a direct result of a battery or battery-powered device. Hazardous material = CERCLA hazardous substance (40 CFR 302, Table 302.4), hazardous waste (40 CFR 262), marine pollutant (49 CFR 172.101 Appendix B), elevated temperature material, listed on Hazardous Materials Table (49 CFR 172.101), or meets criteria for hazard class/division in 49 CFR 173. Written follow-up report: Required for all of above, plus any unintentional release of hazardous material from a package (including tank); or any quantity of hazardous waste discharged during transportation; or structural damage to lading retention system, even if no release, on specification cargo tank with ≥ 1000 gal capacity containing hazardous material; or undeclared hazardous material discovered.	As soon as practical but no later than 12 hours after occurrence of the incident: to NRC by each person in physical possession of the hazardous material. (A reportable incident *must* be reported by telephone, not online.) For infectious substances, notice may be given to the Director, Centers for Disease Control and Prevention, U.S. Public Health Service instead of NRC.	Within 30 days after discovery: to US DOT on DOT Form F 5800.1 (01-2004) "Hazardous Materials Incident Report." Report online at https://hazmatonline.phmsa.dot.gov/incident/ Report must be updated w/i 1 year of incident if: Death results from injury; hazardous material or package info on prior report misidentified; damage, loss or cost not known on prior report becomes known or changes by $25,000 or 10%. See regulation for exceptions to written report.	NRC 800-424-8802 or online at www.nrc.uscg.mil U.S. Public Health Service 800-232-0124 For further information contact US DOT Hazardous Materials Information Center at 800-467-4922 or online at www.phmsa.dot.gov/hazmat
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to **surface of ground**, **surface water , groundwater** or **public sewer system**)	Unpermitted release directly or indirectly to public sewer system, surface of ground, surface water or groundwater from an oil storage facility or on-land facility of a "**polluting material**" (**oil**, **salt**, or any material specified in table 1 in R 324.2009) in excess of its threshold reporting quantity during any 24-hour period. See Part 5 rules, effective 8/31/01, for details and exemptions. HB 5586 effective 6/15/04 amended the reporting requirements. *Rule revisions pending as of April 2014.*	As soon as practicable after detection: to PEAS *and* 911 by owner, operator or manager. State agencies call 911 if release reported to them by another state or Canada.	Within 10 days after release: to DEQ-WRD district supervisor *and* to the local health department where the release occurred, outlining cause, discovery, response & prevention of recurrence.	PEAS: 800-292-4706 For further information contact DEQ-WRD

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	**Reporting Criteria**	**Initial Notification**	**Written Follow-up Report**	**Notes**
CWA Section 311 33 CFR 153 (**Navigable waters** – Coast Guard/DOT) Control of Pollution by **Oil** and **Hazardous** Substances, Discharge Removal	Discharge of a harmful quantity of **oil** or a **hazardous** substance from a vessel or onshore or offshore facility into or upon navigable **waters** of the United States or adjoining **shorelines**. Harmful quantity = oil discharge that violates applicable water quality standards, or causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or a CERCLA hazardous substance (40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility. If direct reporting to NRC not practicable, may report to district Coast Guard or EPA predesignated OSC.	Not required.	NRC 800-424-8802 or online at **www.nrc.uscg.mil** District 9 Coast Guard 216-902-6117 EPA Region 5 for predesignated OSC 312-353-2318 For further information contact EPA Region 5 at 312-353-8200 or District 9 Coast Guard at 216-902-6045
CWA Section 311 40 CFR 110 (**Discharge of Oil**)	Discharges of **oil** that violate applicable **water** quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining **shorelines**, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility.	Not required.	NRC 800-424-8802 or online at **www.nrc.uscg.mil** For further information contact DEQ-WRD
NREPA 1994 PA 451 Part 31, Water Resources Protection (**Sewer Systems**)	Discharge of untreated sewage or partially treated sewage from a **sewer system** onto land or into the waters of the state. "Sewer system" means a sewer system designed and used to convey sanitary sewage or storm water, or both.	Immediate (within 24 hours): to DEQ-ODWMA district office (PEAS after hours); Local health depts.; Daily newspaper circulated in source & affected counties; & Affected municipalities.	At end of discharge: to same parties notified initially on Form EQP 5857 (Rev. 12/2011) "Report of Discharges of Untreated or Partially Treated Sewage." Includes results of E. coli testing.	PEAS: 800-292-4706 For further information contact DEQ-ODWMA
NREPA 1994 PA 451 Part 41, **Sewerage Systems**	Discharges of pollutants from **sewerage systems** (which can include combined sewers) in excess of those authorized by a discharge permit issued by the DEQ to surface water or groundwater as a result of a facility breakdown or emergency. Sewerage systems handle sanitary sewage or other industrial liquid wastes.	Promptly: to DEQ-ODWMA district office (PEAS after hours) by owner.	Within 72 hours: to DEQ-ODWMA district supervisor, outlining cause, discovery, corrective actions taken to minimize impact, restore operations, and eliminate future unpermitted discharges.	PEAS: 800-292-4706 For further information contact DEQ-ODWMA

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.
***This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations**.
Additional reporting requirements might be found **in permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 211, **Underground Storage Tanks** Part 213, Leaking Underground Storage Tanks	Releases of a **regulated substance** of any amount from underground storage tank (UST) systems (includes the emergency shutoff valve on down) subject to registration; overfill from UST fillpipe or vent onto ground; release from aboveground pipe attached to UST system. Regulated substance = petroleum or CERCLA hazardous substance (40 CFR 302, Table 302.4) or substance listed in CAA title 1 part A sect 112. Petroleum includes, but is not limited to, crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents.	(Part 211) Within 24 hours after discovery: to LARA Bureau of Fire Services, Storage Tank Division by email, or fax on Form EQP 3826 (Rev. 4/12) If free product, Form EQP 3800 (Rev 02/2003) required by UST owner or operator, or employee of owner or operator. Includes releases discovered years after UST system removed	(Part 213) At 180 days Initial Assessment Report on Form EQP3841 (Rev. 02/2003) if not closed; at 365 days Final Assessment Report on Form EQP3842 (Rev. 11/2006) if still not closed; at closure Closure Report on Form EQP3843 (Rev. 02/2003) to DEQ-RRD district project manager.	Email: **deq-std-tanks@michigan.gov** Fax:517-335-2245 For further information contact DEQ-RRD or phone 800-MICHUST
NREPA 1994 PA 451 Part 111, **Hazardous Waste** Management (Generators; Treatment, Storage & Disposal Facilities (TSDF); Transporters)	Any amount of characteristic **hazardous waste** or listed hazardous waste (as defined in R 299.9203 “Hazardous Waste Rule 203”) reaches the surface water or groundwater, or A fire, explosion, or other release of hazardous waste or hazardous waste constituent occurs that could threaten human health or the environment. or A release of >1lb (or ≤1lb if not immediately cleaned up) hazardous waste to the environment from a tank system or associated secondary containment system. Additional hazardous waste reporting requirements under NREPA Part 201 and CERCLA. NREPA Part 111 requires transporters to comply with 49 CFR 171 and 33 CFR 153.	Immediate: to PEAS (or for Tank systems/secondary containment, within 24 hours of discovery: to DEQ-OWMRP) and to NRC if threat to human health or environment outside facility by generator, or owner or operator of TSDF, or transporter.	For large quantity generators and TSDF: Within 15 days after incident IF the contingency plan had to be implemented: to DEQ-OWMRP. For tank/secondary containment systems: Within 30 days of discovery: to DEQ-OWMRP. For transporters: to US DOT if required per 49 CFR 171.	PEAS: 800-292-4706 NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 121, **Liquid Industrial Waste**	The **liquid industrial waste** spill could threaten public health, safety, welfare, or the environment, or has reached surface water or groundwater. Liquid industrial waste includes nonhazardous brine, by-product, industrial wastewater, leachate, off-spec commercial chemical product, sludge, sanitary or storm sewer clean-out residue, grease trap clean-out residue, spill residue, used oil, or other liquid waste not regulated by other laws.	Immediate: to PEAS and local authorities by generator, transporter, or owner or operator of facility. Refer to MCL 324.12111(1) for required report elements	Prepare within 30 days after incident. Submit upon request: to DEQ-OWMRP district supervisor. Refer to MCL 324.12111(1) for required report elements	PEAS: 800-292-4706 For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 55, **Air Pollution** Control	Abnormal condition, start-up, shutdown, or malfunction that results in emissions exceeding permissible (in rule, permit or order) levels of **hazardous air pollutants** (HAPs) (CAA Sect. 112(b)) or **toxic air contaminants** (as specified in permit) for > 1 hour, or any air contaminant for > 2 hours. Written follow-up report only required for emission exceedences lasting > 2 hours.	As soon as possible, but not later than 2 business days after discovery: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 10 days after start-up, shutdown, or abnormal condition, malfunction corrected. Or within 30 days of abnormal condition, malfunction discovery- whichever first: to DEQ-AQD district supervisor.	PEAS: 800-292-4706 For further information contact DEQ-AQD

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	**Reporting Criteria**	**Initial Notification**	**Written Follow-up Report**	**Notes**
NREPA 1994 PA 451 Part 55, **Air Pollution** Control (Permit to Install Exemptions)	Emergency venting of **natural gas** from transmission and distributions systems or **field gas** from gathering lines in amounts > 1,000,000 standard cubic feet per event. Emergency = unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property or the environment if not controlled immediately. See R 336.1285(mm), effective 6/20/2008, for details.	Within 24 hours of the event: to PEAS by owner or operator.	Not required.	PEAS: 800-292-4706 For further information contact DEQ-AQD
Public Health Code 1978 PA 368 Part 133, **Dry Cleaning**	Condition or incident presents a threat or hazard to **public health** or safety.	Immediate: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 30 days after incident: To DEQ-AQD district supervisor.	PEAS: 800-292-4706 For further information contact DEQ-AQD
NREPA 1994 PA 451 Part 615, Supervisor of Wells (**oil and gas production fields**)	A loss, spill or release of (1) any amount of **brine**, **crude oil**, or **oil or gas field waste** *unless* it is less than 42 gallons and occurs while an authorized representative is on site and is completely contained and cleaned up within 1 hour, or (2) any unpermitted amount of **natural gas**, or (3) **chemicals** used in association with oil and gas activities.	Within 8 hours after discovery of: 42 gallons or more of brine, crude oil, or oil or gas field waste, or any amount of chemical or natural gas, or; less than 42 gallons if the spill contacts surface water, groundwater, or other environmentally sensitive resources, or is not completely contained and cleaned up within 48 hours: to DEQ-OOGM district office (PEAS after hours) by permittee.	Within 10 days after discovery of loss or spill: to DEQ-OOGM district supervisor on Form EQP-7233 (Rev 1/2012) "Report of Loss or Spill." by permittee Written report only for less than 42 gallons of brine, crude oil, or oil and gas field waste if spill does not contact surface water, groundwater, or other environmentally sensitive resources, and is completely contained and cleaned up within 48 hours.	PEAS: 800-292-4706 For further information contact DEQ-OOGM
49 CFR 191 Transportation of Natural and Other **Gas by Pipeline**	An incident, meaning: (1) Event that involves a release of **gas** from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility that results in: Death or hospitalization; or Property damage ≥ $50,000; or estimated gas loss of ≥ three million cubic feet. (2) Event that results in emergency shutdown of LNG facility. (3) Significant event per operator. Written Incident reports not required for LNG facilities. Applies to pipeline systems and the transportation of gas through those systems in or affecting interstate or foreign commerce. (See 49 CFR 191.3 for details.)	Earliest practicable moment following discovery: to NRC by operator. Notification must be electronic unless there is a safety-related condition to report.	As soon as practicable, and within 30 days after discovery: to US DOT. on DOT Form PHMSA F 7100.1 "Incident Report – Gas Distribution System." or PHMAS F 7100.2 "Incident Report – Gas Transmission and Gathering Systems" or PHMSA F 7100.3 "Incident Report – Liquefied Natural Gas (LNG) Facilities" Supplemental report filed as necessary as soon as practicable.	NRC 800-424-8802 or online at **www.nrc.uscg.mil** For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.
***This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations**.
Additional reporting requirements might be found **in permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 195 Transportation of **Hazardous Liquids by Pipeline**	Release of hazardous liquid (**petroleum**, **petroleum products**, or **anhydrous ammonia**) or **carbon dioxide** from a pipeline system that results in any of the following: (a) Explosion or fire; (b) Release of ≥ 5 gallons (except if < 5 barrels released due to maintenance and release not otherwise reportable, confined to property, does not pollute water, and cleaned up promptly); (c) Death of any person; (d) Injury requiring hospitalization; or (e) Property damage > $50,000. (See 49 CFR 195.50, revised 1/8/02, for details) Applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate or foreign commerce. (See 49 CFR 195.1 for details.)	Earliest practicable moment following discovery: to NRC by operator if Release caused: Death or hospitalization; Fire or explosion; Property damage; Water pollution; or was Significant per the operator.	As soon as practicable, and within 30 days after discovery: to US DOT on DOT Form PHMSA F 7000-1 "Accident Report – Hazardous Liquid Pipeline Systems" Supplemental report must be filed within 30 days after operator receives changes or additions to original report.	NRC 800-424-8802 or online at **www.nrc.uscg.mil** For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov
1978 PA 368 Part 135, **Radiation** Control	For any emergency. Or for incident involving naturally occurring or accelerator produced **radioactive material**- Immediate notice if: Incident may have caused or threatens to cause: dose to body 25 rems, to skin 150 rems, to extremities 375 rems (per rule 247); 24 hour concentration exceeds 5000 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 week, or property damage >$100,000. Notice within 24 hours if: Incident may have caused or threatens to cause: dose to body 5 rems, to skin 30 rems, to extremities 75 rems (per rule 247); 24 hour concentration exceeds 500 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 day, or property damage >$1000.	Immediate or within 24 hours (see reporting criteria): to DEQ-OWMRP Radiological Protection Section (PEAS after hours) or MSP Operations Division for all **Power Plant** related incidents (day or night). by licensee or registrant.	Within 30 days after release: to DEQ-OWMRP Radiological Protection Section by licensee or registrant. Written report also required if level of radiation or concentration of radioactive material in unrestricted area >10 times any applicable limit. See Rule 250 (R 325.5250) for required report content.	DEQ-OWMRP Radiological Protection Section 517-284-5185 MSP Operations Div 517-241-8000 PEAS: 800-292-4706 For further information contact DEQ-OWMRP Radiological Protection Section
10 CFR 20 (Standards for Protection Against **Radiation**)	For incident involving source, by-product, or special nuclear **radioactive material**- Immediate notice if: Event that may have caused or threatens to cause: effective dose equivalent to individual 25 rems, lens dose equivalent 75 rems, shallow-dose equivalent to skin or extremities 250 rads; individual could receive 5 times annual limit on intake in 24 hours. OR Any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas. Notice within 24 hours if: Event that may have caused or threatens to cause: an individual in 24 hours to receive effective dose equivalent >5 rems, lens dose equivalent >15 rems, shallow-dose equivalent to skin or extremities >50 rems; individual could receive >1 times annual limit on intake in 24 hours.	Immediate or within 24 hours (see reporting criteria): to USNRC by USNRC Licensee responsible for the incident.	Within 30 days of incident: to USNRC by licensee. Report content specified in 10 CFR 20.2003 Written report also required for occurrences as specified in 10 CFR 20 Section 20.2203 and after the occurrence of any lost, stolen, or missing licensed material becomes known to the licensee, and if at the time the report is filed all licensed material in a quantity greater than 10 times the quantity specified in appendix C to part 20 is still missing.	US Nuclear Regulatory Commission (USNRC) 301-816-5100 For further information contact DEQ-OWMRP Radiological Protection Section 517-284-5185
MIOSHA 1974 PA 154 Section 61, Records & Reports; Notice of **Fatalities or Hospitalization**	Any release that results in one **death** or the **hospitalization** of 3 or more persons.	Within 8 hours: to MIOSHA Hotline.	Not required.	MIOSHA Fatality or Catastrophe Hotline 800-858-0397 For further information contact LARA-MIOSHA 517-322-1831

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	**Reporting Criteria**	**Initial Notification**	**Written Follow-up Report**	**Notes**
TSCA 40 CFR 761.125 (**PCBs**)	Spills of **PCB**s at concentrations of 50 ppm or more and subject to decontamination requirements under TSCA that: contaminate surface water, sewers, drinking water supplies, grazing lands or vegetable gardens, or exceed 10 pounds. (TSCA specifies that these requirements are in addition to any under CWA or CERCLA. e.g. CERCLA requires spills of 1 pound or more to be reported to NRC.)	As soon as possible after discovery, and within 24 hours: to EPA Region 5.	Not required to be submitted. Records of cleanup and certification of decontamination shall be documented.	EPA Region 5 Corrective Action Section 312-886-7890 For further information contact EPA Region 5 Corrective Action Section
SARA Title III Section 313 40 CFR 372 (**Toxic chemical** release reporting)	Covered facilities as defined in 40 CFR 372 subpart B are subject to **toxic** chemical release reporting for toxic chemicals and chemical categories listed in 40 CFR 372 subpart D.	Not applicable.	Annually by July 1: to EPA & SERC on EPA's Form R "Toxic Chemical Release Inventory Reporting Form" (EPA Form 9350-1, Rev.10/2011) Report aggregate releases (permitted & unpermitted)	Michigan SARA Title III Program accepts reports on behalf of SERC For further information contact Michigan SARA Title III Program 517-284-7272

Acronyms used in table:

AQD = Air Quality Division
AST = Above Ground Storage Tank
CAA = Clean Air Act
CAFO = Concentrated Animal Feeding Operation
CERCLA = Comprehensive Environmental Response, Compensation and Liability Act of 1980
CFR = Code of Federal Regulations

CWA = Clean Water Act
DEQ = Michigan Department of Environmental Quality
DOT = Department of Transportation
EHS = Extremely Hazardous Substance
EPA = U. S. Environmental Protection Agency
EPCRA = Emergency Planning & Community Right-to-Know Act
FIFRA = Federal Insecticide, Fungicide, & Rodenticide Act
FL/CL = Flammable and combustible liquids
FR = Federal Register
HAP = Hazardous Air Pollutant

HazMat = Hazardous Materials
HB = House Bill
LARA = Michigan Department of Licensing & Regulatory Affairs
LEPC = Local Emergency Planning Committee
LNG = Liquefied Natural Gas

LPG = Liquefied Petroleum Gas
MCL = Michigan Compiled Laws

MDARD = Michigan Department of Agriculture & Rural Development
MIOSHA = Michigan Occupational Safety and Health Administration
MSP = Michigan Department of State Police
NRC = National Response Center (U.S. Coast Guard)
NREPA = Natural Resources & Environmental Protection Act
ODWMA = Office of Drinking Water & Municipal Assistance

OOGM = Office of Oil, Gas, and Minerals
OPS = Office of Pipeline Safety (US DOT)
OSC = On Scene Coordinator
OWMRP = Office of Waste Management & Radiological Protection

PA = Public Act (Michigan)
PCB = Polychlorinated biphenyl
PEAS = Pollution Emergency Alerting System
PHMSA = Pipeline & Hazardous Materials Safety Administration
RMP = Risk Management Program

RRD = Remediation and Redevelopment Division
SARA = Superfund Amendments and Reauthorization Act of 1986
SERC = State Emergency Response Commission
TRI = Toxic Chemical Release Inventory
TSCA = Toxic Substance Control Act
TSDF = Treatment, Storage & Disposal Facility
US DOT = U.S. Department of Transportation
USNRC = U. S. Nuclear Regulatory Commission

UST = Underground Storage Tank
WRD = Water Resources Division

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.
*****This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations**.
Additional reporting requirements might be found **in permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.

Appendix F

STANDARD OPERATING PROCEDURE
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE Township OF Grosse Ile
9601 Groh Road, Grosse Ile, MICHIGAN 48138

APRIL 2017

SECTION A – PURPOSE

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a **description of current and proposed BMPs** to meet the minimum control measure requirements for the construction stormwater runoff control program to the maximum extent practicable. **The Township of Grosse Ile does not administer a Part 91 program and is not a designated municipal enforcement agency.** The following standard operating procedure provides a description of the procedures the Township employs for construction site runoff control that includes notification procedures and ensuring proper permits are obtained by those disturbing greater than one acre of soil.

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the construction storm water runoff control program to the maximum extent practicable, which shall be incorporated into the SWMP.

SECTION B – NOTIFICATION PROCEDURE

The Township of Grosse Ile will notify the Wayne County Land Resources Management Division (LRMD) when soil or sediment is discharged into the Township's MS4 in a quantity that could negatively impact surface waters of the state. Complaints received by the Township will be referred to WCLRMD within 24 hours.

Through the site plan review process, the Township ensures that construction activity one acre or greater in total earth disturbance with the potential to discharge to the MS4 does obtain a Part 91 Permit and/or a State of Michigan Permit by Rule or is reviewed by an approved Authorized Public Agency through the site plan review process.

SECTION C – MEASUREABLE GOALS

To demonstrate the effectiveness of the County's Part 91 program, the following metrics will be tracked for reporting purposes:

- Number of Part 91 related complaints received and referred to the County by the Township.
- Number of Part 91 permits issued by the County within the Township.

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION D – REPORTABLE DISCHARGES

The Township will not report instances of *de minimis* soil discharges to MDEQ. For instances where the discharge of sediment cannot be immediately contained on site, or if there are other pollutants that include pesticides, petroleum derivatives, construction chemicals, and solid waste associated with the discharge in quantities that are consistent with the spill response plan as defined in the collaborative IDEP, the Township will notify the MDEQ through the Pollution Emergency Alert System (PEAS) at 1-800-292-4706.

SECTION E –STATE OF MICHIGAN PERMIT BY RULE

The Township shall advise the landowner or recorded easement holder of the State of Michigan Permit by Rule (Rule 323.2190) for storm water discharge from construction activity if the area of the disturbance is greater than 5 acres. These criteria will be identified during the site plan review process and will be included in correspondence with the landowner as appropriate.

SECTION F – PROCESS FOR REVISION

Any questions on this policy and procedure should be directed to the Stormwater Manager or the Township Building Official. This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

Appendix G

STANDARD OPERATING PROCEDURE
POST CONSTRUCTION STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE Township OF Grosse Ile
9601 Groh Road, Grosse Ile, MICHIGAN 48138

APRIL 2017

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the post-construction stormwater runoff control program to the maximum extent practicable. Post-construction stormwater runoff controls are necessary to maintain or restore stable hydrology in receiving waters by limiting surface runoff rates and volumes and reducing pollutant loadings from sites that undergo development or significant redevelopment.

SECTION B – ADOPTION OF COUNTY STANDARDS

The Township of Grosse Ile intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The Township will review them when available. Any necessary updates to these standards will be drafted and adopted within 6 months of being finalized by Wayne County.

SECTION C – MEASURABLE GOALS

To demonstrate the effectiveness of the post construction stormwater runoff control program, the following metrics will be tracked for reporting purposes:

- Number of stormwater site plan reviews requested and completed
- Number of maintenance violations of constructed BMPs
- Number of instances where the Township had to undertake corrective measures

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION D – PROCESS FOR REVISION

This procedure shall be reviewed every two years by the Stormwater Manager for any updates to streamline the requirements.

Appendix H

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

GENERAL PROCEDURES

PREPARED FOR:

THE Township OF Grosse Ile
9601 Groh Road, Grosse Ile, MICHIGAN 48138

APRIL 2017

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable to prevent or reduce the discharge of pollutants from municipal facilities and operations.

SECTION B –FACILITY ASSESSMENT AND PRIORITIZATION

Township owned and operated facilities have been assessed for their potential to discharge pollutants to the waters of the state. Each facility was evaluated based on the following criteria:

1. Amount of urban pollutants stored at the site (i.e. sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
2. Identification of improperly stored materials
3. Potential for polluting activities to be conducted outside (i.e. vehicle washing)
4. Proximity to waterbodies
5. Poor housekeeping practices
6. Discharge of pollutants of concern to impaired waters

Based on these criteria, the potential for each facility to discharge pollutants to the waters of the state were rated high, medium, or low. For **"low" priority facilities** where no assessment factors are present, catch basin cleaning and street sweeping will be performed as indicated in the applicable procedures for these activities. For **"medium" priority facilities**, appropriate BMPs are considered based on the assessment factors present to prevent or minimize the potential for pollutants from entering surface waters of the state. **"High" priority facilities** have specific procedures in place in order to ensure that proper steps are followed in order to minimize and prevent the discharge of pollutants to storm water from the site.

SECTION C– UPDATES AND PRIORITY REVISION

This inventory shall be updated within 30 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments shall be revised within 30 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

The following table identifies the Township's owned or operated facilities with a discharge of stormwater to surface waters of the state. **Table 1** includes a list of properties owned or operated by the Township that has stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state. An up-to-date map(s) showing the location of the facilities and structural storm water controls is available at Grosse Ile Township Hall Building Department or the Township Engineers Office.

Table 1: Township or Operated Properties with Stormwater Controls

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPS Facility 8555 Groh Rd.	Catch Basins (3) Dumpsters (2) Aboveground Storage Tank (2) Stockpiles (7)	High	1, 3	See Section E
Grosse Ile Community Schools Maintenance Building 7900 Grays Dr.	Catch Basins (3) Dumpsters (1) Salt Barn (1)	High	1,3	See Attached SWPPP And Appendix E
Waters Edge Maintenance Building 25215 West River Rd.	Catch Basins (0) Stockpiles (3) Dumpsters (2) Detention Ponds (2)	Medium	1,3	Part 5 Rules / Secondary Containment Detention Pond Maintenance
Centennial Farm 25797 3rd St.	Catch Basins (6) Dumpsters (4) Vegetated Swales (3)	Medium	1	Catch basin cleaning Animal Waste Disposal
Township Hall 9601 Groh Rd.	Catch Basins (11) Dumpsters (2)	Low	1	Catch basin cleaning Parking Lot sweeping
Public Safety Building 24535 Meridian Rd.	Catch Basins (1) Dumpsters (1)	Low	1	Catch basin cleaning Parking Lot sweeping
Macomb Street Township Parking Lots No address	Catch Basins (3)	Low	1	Catch basin cleaning Parking Lot sweeping
Grosse Ile Community Schools 23276 East River Rd.	Catch Basins (6) Detention Ponds (7) Vegetated Swales (3) Dumpsters (2)	Medium	1	Catch basin cleaning Parking Lot sweeping Detention Pond Maintenance
Grosse Ile Wastewater Treatment Facility 24975 West River Rd.	Covered under NPDES Permit MI0026191	NA	NA	NA
Grosse Ile Airport 9601 Groh Rd.	Covered under NPDES Permit MIS310000 COC: MIS310668	NA	NA	NA

In addition to the properties in Table 1, see attached GI Properties Check List and Survey Documents.

SECTION E –SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a standard operating procedure (SOP) for identifying the structural and non-structural stormwater controls implemented and maintained to prevent or reduce pollutant runoff at each facility with the high potential for pollutant runoff.

E.1 Inventory and Description of Materials and Activities

The Township's Department of Public Works (DPS) operations are conducted at their facility at 8555 Groh Road. The Nested School District also operates a Bus/Maintenance Facility at 7900 Grays Drive. Both of these sites are considered high priority sites due to the following operations:

DPS Facility – 8555 Groh Road

- Fuel Storage and Fueling
- Stockpiled materials
- Maintenance and cleaning of vehicles and equipment

Grosse Ile Schools Bus /Maintenance Facility – 7900 Grays Drive

- Fuel/Oil Storage and Fueling
- Salt Storage
- Stockpiled materials
- Maintenance and cleaning of vehicles and equipment

Site specific standard operating procedures have been developed for the above facilities and are included as separate documents.

SECTION F –CATCH BASIN MAINTENANCE PRIORITY

Catch basins that are inspected and maintained by the Township will be prioritized for routine inspection, maintenance, and cleaning. The criteria for the priority levels that include low, medium, and high are defined as follows:

Low Priority – Catch basins that are of low priority have very little sediment accumulation and do not require routine maintenance. Low priority catch basins are inspected on an as needed basis based on complaints or by DPS staff during normal work activities.

Medium Priority – Catch basins that are of medium priority have a higher rate of sediment accumulation and will require quarterly maintenance more frequently than low priority catch basins.

High Priority – Catch basins that are of high priority have a high rate of sediment accumulation and will require regular monthly routine maintenance and inspection. These catch basins are typically located in areas where sediment is easily mobilized and transported by runoff.

All of the community's catch basins have very little sediment accumulation rates, require little maintenance and are of low priority. Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPS as needed. At that time, it will be determined if the catch basin will require maintenance on a more

frequent interval and warrants a reclassification to a medium priority rating. In the event the priority rating of a catch basin is changed, or new catch basins are constructed, this procedure will be updated and revised to reflect the change in priority within 30 days.

SECTION G – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING

Catch basins are visually inspected during normal work activities or if a complaint is registered by a resident. A visual inspection of the structure will identify any structural defects which may include collapse, cracking, frame damage, pipe collapse, blockage, etc. and will be documented using a standardized form. Catch basin structures in need of structural repairs are identified during the inspection and regular maintenance process based on the results of visual assessments conducted by the Township. With a goal of completing inspections on 20% of Township owned catch basins annually. Structure repairs and maintenance are prioritized based on public safety concerns and after inspections determine the sump to be 50% full of sediment and debris. DPS field staff utilize a vactor truck to remove all solids and liquids from the structure to the extent possible. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property or Wayne County jurisdiction are not inspected, cleaned, or maintained by the Township.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of catch basins repaired/cleaned

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION H – DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance remains in the Vactor Truck and is driven by DPS staff to the Grosse Ile Waste Water Treatment Plant for disposal. Material collected from paved parking lot sweeping activities becomes property of the contracted sweeping contractor and is transported and disposed of by the contractor.

SECTION I –PARKING LOT SWEEPING PRIORITIZATION

Township and Grosse Ile School District owned and maintained parking lots have been prioritized for sweeping. The criteria for the priority levels that include low, medium, and high are defined as follows:

Low Priority – Parking Lots within the Township are of low priority due to their minimal sediment accumulation rates. They are generally swept one time per year.

Medium Priority –Parking Lots of medium priority due to the higher rate of sediment accumulation rates in comparison to low priority lots. Medium priority areas that have been identified by the Township would be swept at least twice, or as needed.

High Priority – Areas that are of high priority have a high rate of sediment accumulation and will require regular, frequent sweeping. These areas are typically located in areas where sediment is

easily mobilized and transported by runoff. There are currently no areas that have been assigned a high priority rating due to excessive sediments and complaints. However, if DPS receives a complaint, a determination of the area will be made by DPS staff to increase sweeping on a more frequent interval as well as a reclassify the area to high priority rating.

If the DPS receives a complaint, a determination of the area will be made by DPS staff on whether to increase sweeping on a more frequent interval as well as a reclassify the area to higher priority rating. In the event a priority rating is changed, or new Township owned parking lots are constructed, this procedure will be updated and revised to reflect the change in priority within 30 days.

Paved Parking Lot areas are designated as low priority for which sweeping activities are conducted by an outside contracted Sweeping Contractor one time per year using Mechanical Sweeper in accordance with manufacturers operating instructions. Collected sediment from street sweeping activities is disposed of as described in Section H.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Summary of frequency of street sweeping, number of lots swept

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and paved parking lot sweeping programs, the Township School District also maintains a Forebay Detention Ponds. This is inspected and maintained per the long-term maintenance schedule. The catch basins located on the DPS facility site that are in proximity to materials stored outdoors have Flex storm catch basin inserts to prevent the excessive accumulation of sediment in the catch basin sump. Visual inspections of the covers are inspected on a weekly basis over the course of daily operations. Insert catchment bags that are torn or otherwise damaged are replaced.

Detention Basins

Township and School District owned Detention Basin inspections occur on a biweekly basis which includes assessment of condition of the stand pipe, inlet pipe, and rip-rap in the surrounding areas, as well as observing the general condition of the banks, noting any erosion, and amount of sedimentation of the basin overall. Maintenance consists of mowing banks and surrounding areas on an as needed basis, mechanical removal of vegetation as needed around the basin inlet, and stand pipe.

Oil/Water Separators

Oil/Water Separators are visually during weekly housekeeping inspections. Oils are removed at a minimum annually or when level of oil reaches 4inches below invert of effluent pipe in structure. Cleaning is performed by the Township's and District's used

oil removal contractor while collecting used oil for re-refining.

Vegetative Swales

Township and School District owned vegetative swales inspections occur on a biweekly basis which includes assessment of condition of the surrounding areas, as well as observing the general condition of the swales, noting any erosion, and amount of sedimentation. Maintenance consists of mowing swales and surrounding areas on an as needed basis, mechanical removal of vegetation as needed.

Secondary Containment

Secondary Containment is inspected during weekly housekeeping inspections for any unusual changes in volume of the contained product, as well as monitoring the ratio of product stored to containment capacity . Transfer any excess contained liquid to a suitable container, or arrange for removal by the Township's and District's used oil removal contractor.

Catch Basin Inserts

The catch basins located on the DPS and District Maintenance facility sites that are in proximity to materials stockpiles are equipped with FlexStorm inserts fabric to prevent the excessive accumulation of sediment in the catch basin sump. Visual inspections of the inserts are inspected on a daily basis over the course of daily operations. Fabric that is torn or otherwise damaged is replaced.

In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 30 days.

In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 30 days.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of inspections of storm water controls as identified above
- Number of problems identified
- Number of problems resolved

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION K – NEW APPLICANT OWNED FACILITIES

In the event the Township acquires or constructs new structural stormwater controls, the design of these structures will comply with the stormwater standards that have been adopted by the Township and Wayne County. Site plans will be reviewed by the Township, or its consultants, to ensure the appropriate standards are met.

SECTION L – CERTIFIED PESTICIDE APPLICATOR

The Township does not have any certified pesticide applicators on staff; the Township will retain the services of a pesticide application contractor that possesses a state applicator's license. Any application activities that occur are overseen by a Township or District representative to ensure quality of work and proper application and disposal.

SECTION M – EMPLOYEE TRAINING

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The Township participates in training opportunities that are made available by SEMCOG, Wayne County, the Alliance of Downriver Watersheds, and others as deemed appropriate. Employee training components for the Township DPS Department includes:

Employees Trained	**Training Description and Frequency**
New DPS Employees	Upon hire, employees will: • View the Municipal Storm Water Pollution Prevention Storm Watch training video. • Read and become familiar with the Township's SOPs.
All DPS Field Employees	Annually, employees will: • View the Municipal Stormwater Pollution Prevention Storm Watch training video. • Review proper materials storage and handling. • Review good housekeeping and pollution prevention practices. • Review examples of illicit discharges to the storm sewer system • Review Township Spill Response Procedures
Key staff	Once per permit cycle: • Attendance of key staff to relevant training workshops by the Alliance of Downriver Watersheds, Wayne County, SEMCOG, MDEQ, or others, when available.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of new employees trained
- Number of existing field employees trained
- Number of key staff trained

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION N –CONTRACT REQUIREMENTS AND OVERSIGHT

The contractors hired by the Township to perform municipal operations that potentially impact stormwater are required to follow appropriate pollution prevention BMPs indicated in the Township's contract language. In cases where an outside contractor is hired to perform services that could impact stormwater, the contracting company will be required to follow appropriate pollution prevention BMPs. All work performed by outside contractors are monitored by Township staff through daily observation to ensure quality of work, adherence to the specified contract language, and to ensure that potential impacts to stormwater are minimized.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of stormwater pollution related incidents pertaining to activities or work performed by the contractor.
- Number of incidents where the Township required corrective action by the contractor

These metrics will be tracked over the reporting cycle that is specified in the Township's Certificate of Coverage.

SECTION O – PROCESS FOR REVISION

This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

Standard Operating Procedure Pollution Prevention and Good Housekeeping

Grosse Ile Public Services Facility

8555 Groh Road

Prepared For:

Township of Grosse Ile
8555 Groh Road Grosse Ile, MI

April 2017

V2.0

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable to prevent or reduce the discharge of pollutants from municipal facilities and operations. The following standard operating procedure (SOP) is intended for the **Township of Grosse Ile Public Services facility**, which has been deemed as a high priority based on the operations that are conducted at the site.

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires an SOP for identifying the structural and non-structural stormwater controls implemented and maintained to prevent or reduce pollutant runoff at each facility with the high potential for pollutant runoff. The Public Services was assessed for its potential to discharge pollutants to the waters of the state and as deemed a high priority based on the following applicable criteria:

1. Amount of urban pollutants stored at the site (i.e. sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
2. Potential for polluting activities to be conducted outside (i.e. vehicle washing)

Based on these criteria, the Public Services facility has been deemed a high priority site, which has prompted the need for a site-specific standard operating procedure to prevent or minimize the potential for pollutants from entering surface waters of the state as outlined in the NPDES permit application.

SECTION C –INVENTORY AND ASSESSMENT

The following is an inventory and assessment of stormwater controls (i.e. catch basins, detention basins, etc.) and facility operations that occur on site.

- Stormwater catch basins (3)
- 5 yard Dumpster (2)/ Low Potential Discharge
- 500 gallon diesel above ground fuel tank (1)/ Low Potential Discharge
- 500 gallon gasoline above ground fuel tank (1) /Low Potential Discharge
- Grease Tubes/ Low Potential Discharge
- 55 gallon Anti-freeze (1) / Low Potential Discharge
- Stockpile (7) / Low Potential Discharge

C.1 Public Services Inventory and Description of Materials and Activities

The Township of Grosse Ile Public Services Facility is located at 8555 Groh Road Grosse Ile, MI and consists of Public Services administration, fleet maintenance, maintenance material and general storage. Municipal activities that occur at the facility include the following:

- Fuel Storage and Fueling / Low Potential Discharge
- Maintenance and cleaning of vehicles and equipment / Low Potential Discharge
- Stockpiling / Low Potential Discharge

SECTION D – FUEL STORAGE AND FUELING

The Township's Public Services Facility currently has two above ground storage tanks with maximum capacities of 500 gallons each. Part 5 Rules indicate that fuel storage areas "shall be designed, constructed, maintained, and operated to prevent the release of polluting materials through sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater's of this state." The Township has met this requirement through the proper storage and pollution prevention methods currently in place. These include the following:

- The diesel and gasoline fuel tanks are 500-gallon tanks that are comprised of steel and are doubled walled. The above ground tanks are located on an impervious concrete pad.
- All bulk liquid tanker delivery vehicles will only be allowed on site after contact has been made with Township personnel and it has been confirmed that these personnel will be present at the delivery point.
- A spill kit will be stationed in close proximity to the storage tanks at all times.
- The fuel station is not located in close proximity to a waterway or catch basin.

A fueling log is maintained to track and record the volume of fuel dispersed for Township vehicles and equipment. Completion of these logs is mandatory and used as secondary control to track the volume of fuel stored in the tanks.

All other vehicle fluids, including the antifreeze and grease, are stored indoors. Floor drains within the Public Services building are connected to the sanitary sewer. Vehicle maintenance activities, including washing, are conducted indoors.

SECTION E – ON SITE WASTE DISPOSAL

Two (2) 5-yard dumpsters are kept onsite for office trash and construction refuse. The dumpsters are not used for the disposing of hazardous materials. The lids of the dumpsters are to be closed at all times.

E.1 Household Hazardous Waste

The Township relies on the services of the Wayne County Department of Public Services' Household Hazardous Waste Program. The County hosts 4 Household Hazardous Waste Collection Days per year, which are open to Wayne County residents. The Township advertises this service to its residents. http://www.waynecounty.com/doe/household-hazardous-waste-program.htm.

SECTION F – VEHICLE WASHING AND MAINTENANCE

Vehicle maintenance activities are conducted by Public Services staff for the Township of Grosse Ile's entire vehicle fleet, but no vehicles in use by the police and fire departments. Maintenance activities conducted by Public Services staff include, but are not limited to, oil changes and other vehicle fluids, brakes, tune ups, and general repair tasks. A maintenance log is maintained by Public Services staff to document all vehicle maintenance and repair activities.

Vehicle washing activities is conducted indoors in a designated area inside the main Public Services building. The area is sloped inward to contain wash water to prevent wash water from flowing outside of the designated washing area. Wash water is collected by a catch basin located within the vehicle washing area and is connected to the sanitary sewer.

SECTION G – ROAD, PARKING LOT, AND SIDEWALK MAINTENANCE

Parking lot, and sidewalk maintenance activities include cold patching of surfaces that have been removed for water and sanitary line maintenance. These services are addressed by Public Services field staff as determined in the field on an as needed basis. Materials are purchased in quantities as needed to reduce waste. Leftover materials are stored in designated stockpile areas at the Public Services Storage Yard with the exception of cold patch material, which is stored at the main Public Services facility. In cases where a contractor is retained to perform these activities, a Township representative is on site to oversee the work and ensure that leftover material, concrete washout, and other associated pollutants are disposed of properly. Disposing of concrete washout and other excess repair materials into the storm sewer is strictly prohibited by the Township.

Stockpiled materials including gravel, topsoil, woodchips, sand, concrete, and stone are stored on site. Excess material is swept back to piles and kept on impervious surfaces away from any catch basin, or body of water. As a precaution, there are sediment sleeves installed at all catch basins to catch any potential sediment from entering the system.

SECTION H – NON-STRUCTURAL CONTROLS

The Township of Grosse Ile is committed to employing preventative maintenance practices through the use of several non-structural controls to prevent stormwater pollution. These non-structural controls are everyday types of activities undertaken by employees at the facility. The non-structural controls implemented at the Public Services facility are as follows:

H.1 Routine Inspections and Good Housekeeping Procedures

Preventive maintenance involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. Public Services foremen meet with Public Services field staff on a daily basis to discuss daily assignments and objectives. A routine inspection is conducted biweekly by facility staff during site walkthroughs during normal operations activities. The purpose of these inspections is to identify and prevent conditions that could lead to stormwater pollution. A log of corrective actions will be kept on file using the Township's computer system.

Staff inspects all vehicles consistent with Commercial Driver's License Procedures, and performs detailed vehicle inspections every month. Completed vehicle maintenance records and fueling logs are kept on file at the Public Services facility.

Part 5 rules also require surveillance of polluting materials. The routine inspections will include this information for the salt storage and fueling areas.

H.2 Comprehensive Site Inspections

The comprehensive site inspection will include the areas and equipment identified in the preventive maintenance program, good housekeeping procedures, a review of the routine preventive maintenance reports, and any other paperwork associated with this SOP. All Public Services related activities will be evaluated during the comprehensive inspection. In contrast to the routine inspections, comprehensive inspections will focus on areas that have a reasonable potential for significant materials to contaminate stormwater runoff. The comprehensive site inspection for Public Services areas will be conducted every (six) 6 months which generally coincides with a planned cleaning of the entire facility. Documentation of the comprehensive site inspection results will be prepared and kept on file.

H.3 Employee Training Program

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The standard operating procedure for employee training can be found in the Township's general Pollution Prevention and Good Housekeeping Standard Operating Procedure.

SECTION I – PROCESS FOR REVISION

This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

GROSSE ILE TOWNSHIP SCHOOLS

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

TRANSPORTATION FACILITY

7900 Grays Drive
Grosse Ile, MI 48138

2016

Prepared by
C.E. Raines Company
Riverview, Michigan, 48193

Version 2.0, 2016

TABLE OF CONTENTS

Part 5: Discharge Response

List of Tables

Appendices

LIST OF ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
EPA	U.S. Environmental Protection Agency
MDEQ	Michigan Department of Environmental Quality
NPDES	National Pollutant Discharge Elimination System
PE	Professional Engineer
PEAS	Pollution Emergency Alerting System
SPCC	Spill Prevention, Control, and Countermeasure
STI	Steel Tank Institute
UST	Underground Storage Tank
WWTP	Waste Water Treatment Plant

INTRODUCTION

Purpose

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by the Grosse Ile School District to prevent oil discharges from occurring, and to prepare the Grosse Ile School District transportation staff to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations*, Part 112 (40 CFR part 112), and supercedes the earlier Plan developed to meet provisions in effect since 1974.

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

The Grosse Ile School District has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that the Grosse Ile School District Transportation staff must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.

- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.

- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.

- If either of the following occurs, submit the SPCC Plan to the EPA Region 5 Regional Administrator (RA) and the Michigan Department of Environmental Quality (MDEQ), along with other information as detailed in Section 5.4 of this Plan:

  - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or

- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.

Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments can be recertified by the facility response coordinator on the certification page in Section 1.2 of this Plan.

Amend the SPCC Plan within six (6) months whenever where is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified.

Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan.

Part 1: Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

The Grosse Ile School District is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan has the full approval of Grosse Ile School District management. The Grosse Ile School District has committed the necessary resources to implement the measures described in this Plan.

The Grosse Ile School District Business / Transportation Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Authorized Facility Representative (facility response coordinator): Linda Drzyzga

Signature: Linda Drzyzga Date: 3/29/17

Name: Linda Drzyzga Title: Business Manager

1.2 Self-Certification Statement (112.6(a)(1))

The owner or operator is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with accepted and sound industry practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility.

This facility meets the following qualification criteria for self certification, an onshore facility with aboveground oil storage capacity of less than 10,000 U.S. gallons, has had no single discharge exceeding 1,000 U.S. gallons, and no two discharges each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 (not including oil discharges as described in 112(b) that are the result of natural disasters, acts of war, or terrorism), and there is no individual oil storage container at the facility with an above ground capacity greater than 5,000 U.S. gallons.

Linda Drzyzga — Signature
3/29/17 — Date

Linda Drzyzga — Name
Business Manager — Title

1.3 Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the Bus / Transportation facility. The Hours of Operation - 5:45 a.m. - 4:45 p.m., 5 days per week.

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), the Grosse Ile School District periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- commissioning of containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures; or
- changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments. Both Technical and Non-technical amendments must be documented in this section by the facility owner and/or operator. Non-technical amendments include the following:

- change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- change in the name or contact information of spill response or cleanup contractors.

The Grosse Ile School District must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), The Manager reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. The owner or Manager certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3 self-certification criteria. This Plan is dated *April 1, 2011*. The next plan review is therefore scheduled to take place on or prior to *April 1, 2016*.

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by *April 1, 2016*.

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

Bulk storage containers at this facility have never been tested for integrity since their installation. Section 4.2.6 of this Plan describes the inspection program to be implemented by the facility following a regular schedule, including the dates by which each of the bulk storage containers must be tested.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

This SPCC Plan does not follow the exact order presented in 40 CFR part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR part 112.

Table 1-1: Plan Review Log

By	Date	Activity	Comments
Brent Florek CERCO	4/1/2011	Prepare Plan Start of Operations	Initial SPCC Plan.
	4/1/2016	Scheduled review	
		Plan amendment	

Date	Scope	Name	Licensing State and Registration No.
1995	AST Tank Installed- Double Walled Secondary Containment Construction	Tank Info One 1,500 Gal Diesel Fuel Tank	
	AST Tank Installed- Double Walled Secondary Containment Construction	Tank Info One 500 Gal Gasoline Tank	

Table 1-2: SPCC Cross-Reference

Provision	Plan Section	Page
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112.3(e)	Location of SPCC Plan	4
112.5	Plan Review	4 Table 1-1
112.7	Management Approval	3
112.7	Cross-Reference with SPCC Rule	Table 1-2
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112.7(a)(4)	5.4 Discharge Notification	Appendix G Appendix I
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112.7(c)	3.5 Containment and Diversionary Structures	12
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112.7(g)	3.9 Security	15

Provision	Plan Section	Page
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112.7(j)	3.12 Conformance with Applicable State and Local Requirements	18
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112.8(c)(1)	4.2.1 Construction	19
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112.8(c)(8)	4.2.8 Overfill Prevention System	21
112.8(c)(10)	4.2.10 Visible Discharges	21
112.8(c)(11)	4.2.11 Mobile and Portable Containers	21
112.8(d)	4.3 Transfer Operations, Pumping and In-Plant Processes	21
112.20(e)	Certification of Substantial Harm Determination	Appendix B

* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

MDEQ Part 5 Rules – PIPP Documents	
MDNRE Water Resources Protection Part 5 Rules: Spillage of Oil and Polluting Materials	Appendix J
MDEQ Salt and Brine Storage Guidance	Appendix K
MDEQ Reporting Releases Per Part 5 Rules	Appendix L
MDEQ Spill or Release Report	Appendix M
MDEQ PIPP and Part 5 Rules Staff Map	Appendix N
Grosse Ile School District Material Inventory	Appendix O

Part 2: General Facility Information

Name:	Grosse Ile School District Transportation Facility
Address:	7900 Grays Drive Grosse Ile Twp, MI 48138 (734) 362-2455
Type:	On Shore- Bus / Transportation Building
Date of Initial Operations:	1974
Owner/Operator:	Grosse Ile School District 23276 East River Road Grosse Ile Twp, MI 48138
Primary contact:	Linda Drzyzga, Business Manager Work: (734) 362-2578 Cell: (734) 564-7316

2.1 Facility Description (40 CFR 112.7(a)(3))

2.1.1 Location and Activities

Grosse Ile School District Transportation handles, stores, and uses petroleum products in the form of diesel, motor oil, gear oil, and grease. The Bus / Transportation Facility receives products by common carrier via tanker truck. The products are stored in one split 1,500 gallon double walled aboveground storage tank (AST), one 500 gallon double walled aboveground storage tank (AST) and various drums. The facility uses these products for fuel and lubrication.

Hours of operation are between 5:45 AM and 4:45 PM, 5 days per week. Personnel at the facility include the Mechanic and Transportation Staff.

The Site Plan and Facility Diagram included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (SEE PLAN SITE MAP) shows the location of oil containers (Split Fuel Tank), buildings, and structures.

The Grosse Ile School District Transportation Facility is located in a primarily semi-urban area at 7900 Grays Drive in Grosse Ile Twp, Michigan.

The site includes a Bus / Transportation building, one 500 gal double walled gasoline fuel tank, and one 1500 gallon double walled diesel fuel tank. Petroleum products are stored within the Transportation building in 55 gallon containers and within the outdoor fuel tanks located to the north of the Bus / Transportation building.

2.1.2 Oil Storage

Oil storage at the facility consists of 1 split tank: one double walled 500 gallon gasoline tank, and one 1500 gallon diesel fuel AST.

The capacities of significant materials present at the site are listed below. All containers with capacity of 55 gallons or more are included.

Table 2-1: Oil Containers

ID	Storage capacity	Content	Description
Fixed Storage			
1	500 gallons	Gasoline	Aboveground Double-walled tank
2	1500 gallons	Diesel	Aboveground Double-walled tank
3	55 gallons	Motor Oil 15w40	(1) 55 Gallon Drum
4	220 gallons	Used Oil	(4) 55 Gallon Drum
5	55 gallons	Red Grease	(1) 55 Gallon Drum
Salt Storage			
6	5 Tons	Salt –in solid form	Salt Barn

Total Storage:	**2,330 gallons Oil & 5 Tons Salt**

*See attached Inventory for significant material storage in containers less than 55gal or 100lbs

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located on relatively level terrain. Drainage on the Transportation Property is collected by storm water catch basins which flow to the Wayne County Storm Sewer System which empties into the Detroit River.

Approximately 75% of the facility's ground surface area is impervious. The remainder consists of Green Belt / Detention Basin.

2.2.2 Discharge History

Table 2-2 summarizes the facility's discharge history.

Table 2-2: Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
ZERO DISCHARGES		

PART 3: Discharge Prevention - General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

The Split Tank has double-wall construction and is elevated off the ground. The tanks are inspected regularly and follow a regular schedule in accordance with the (Michigan Fire Prevention Code, 1941 PA 207, as amended (Act 207), and the applicable sections of the rules for the Storage and Handling of Flammable and Combustible Liquids, 2003 AACS R 29.5101 et seq. Any leakage from the primary container would be detected through the alarm system which monitors the tanks interstitial space. Any leakage from the secondary shell would be detected visually during scheduled visual inspections by Transportation Personnel.

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

SEE PLAN SITE MAP

3.3 Spill Reporting (40 CFR 112.7(a)(4))

The discharge notification form included in Appendix G will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 3-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

Table 3-1: Potential Discharge Volumes and Direction of Flow

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Aboveground Fuel Storage Tanks				
Failure of aboveground Diesel tank (collapse or puncture below product level of both shells)	1,500	Gradual to instantaneous	SEE PLAN In the northerly direction of Bus Parking Lot near CB A2 and CB A2.1	Double walled Tank Construction with alarm and Land-based spill response capability (spill kit)

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Failure of aboveground Gasoline tank (collapse or puncture below product level of both shells)	500	Gradual to instantaneous	SEE PLAN In the northerly direction of Bus Parking Lot near CB A2 and CB A2.1	Double walled Tank Construction with alarm and Land-based spill response capability (spill kit)
Puncture or Spill of 55 gal Drum	55 Gal Per Drum	Gradual to instantaneous	Contained inside Bus/ Transportation Bld.	Spill Pallet and Land-based spill response capability (spill kit)
Tank overfill	1 to 10	instantaneous	SEE PLAN In the northerly direction of Bus Parking Lot near CB A2 and CB A2.1	High Level Alarm And Land-based spill response capability (spill kit)
Salt	NA	NA	Parking Lot CBs	NA- Covered in Salt Barn

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

Methods of secondary containment at this facility include structures (e.g. built-in secondary containment), drainage systems (e.g., sanitary system treatment), and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

< For bulk storage containers (refer to Section 4.2.2 of this Plan):

  < **Double-wall tank construction.** (AST) have double-wall design with a secondary shell designed to contain fuel from the inner shell and equipped with a notification alarm if the inner shell is compromised.

< In transfer areas and other parts of the facility where a discharge could occur:

- **Drip pans.** Fill ports for all ASTs are equipped with drip pans to contain small leaks from the piping/hose connections.

- **Sorbent material.** Spill cleanup kits that include absorbent material and other portable barriers are located at the fuel dispensing station and with in the Transportation building, as shown on the Facility Diagram in Appendix A. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. Sorbent material and other portable barriers are also on hand for quick deployment in the event of a discharge during activities or any other accidental discharge outside the building, such as from gasoline or diesel filling operations or fuel delivery. The response equipment inventory for the facility is listed in Appendix H of this Plan. The inventory is checked monthly to ensure that used material is replenished.

- **Drainage system.** The facility surface drainage is engineered for detention, spill kits and sorbent materials are used to prevent oil from discharging outside of the facility. Booms and CB covers protect the system from oil entering the system.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

Grosse Ile School District Bus / Transportation management has determined that secondary containment is practicable for containers 55 gallons or greater at this facility.

3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

As required by the SPCC rule, Grosse Ile School District Transportation performs the inspections, tests, and evaluations listed in the following table. Table 3-2 summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

Table 3-2: Inspection and Testing Program

Facility Component	Action	Frequency/Circumstances
Aboveground containers	Test container integrity. Combine visual inspection with another testing technique (non-destructive shell testing). Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.

Facility Component	Action	Frequency/Circumstances
Container supports and foundation	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly

3.7.1 Daily Inspection

The Grosse Ile School District Bus / Transportation mechanic performs a complete walk-through of the facility each day. This daily visual inspection involves looking for tank damage or leakage, stained or discolored soils, or excessive accumulation of water in the storm water system.

3.7.2 Monthly Inspection

The checklist provided in Appendix C is used for monthly inspections by Grosse Ile School District Bus / Transportation personnel. The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, hoses, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill hoses for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Verifying the proper functioning of overfill prevention systems.
- Verifying salt is completely covered in the salt barn away from precipitation.
- Checking the inventory of discharge response equipment and restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Manager. Visible oil leaks from tank walls or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Mechanic and maintained with this SPCC Plan for a period of three years.

3.7.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in March of each year using the checklist provided in Appendix C of this Plan.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage systems.

Written annual inspection records are signed by the Mechanic and maintained with this SPCC Plan for a period of three years.

3.7.4 Periodic Integrity Testing

In addition to the above monthly and annual inspections by facility personnel, Tanks are periodically evaluated by a State Hazardous Materials Storage Inspector, as described in Section 4.2.6 of this Plan.

3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))

The Manager is the facility designee and is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

Grosse Ile School District Bus / Transportation management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

A simulation of an on-site discharge has been conducted, and future training exercises will be periodically held to prepare for possible discharge responses.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix D and maintained with this SPCC Plan for a period of three years.

3.9 Security (40 CFR 112.7(g))

The facility is fenced and patrolled by the Grosse Ile Twp Police when the facility is unattended.

Lights illuminate the Grosse Ile School District Bus / Transportation Facility to allow for the discovery of discharges and to deter acts of vandalism.

Fuel Pumps have locked hatches and a security system for dispensing fuel.

3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7(h))

The potential for discharges during tank truck unloading operations is monitored at this facility. Grosse Ile School District Bus / Transportation management is committed to ensuring the safe transfer of material to and from the fuel storage tanks. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

3.10.2 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. The Grosse Ile School District Bus / Transportation ensure that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Manager or his designee (Mechanic) supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

All loading and unloading of tank vehicles takes place only in the designated fuel tank area.

Transfer operations are performed according to the minimum procedures outlined in Table 3-3.

Table 3-3: Fuel Transfer Procedures

Stage	Tasks
Prior to loading/ unloading	☐ Visually check all hoses for leaks and wet spots. ☐ Verify that sufficient volume is available in the storage tank or truck. ☐ Ensure that the vehicle's parking brakes are set. ☐ Verify proper alignment of valves and proper functioning of the pumping system.
During loading/ unloading	☐ Driver must stay with the vehicle at all times during loading/unloading activities. ☐ Periodically inspect all systems, hoses and connections. ☐ When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. ☐ Monitor the liquid level in the receiving tank to prevent overflow. ☐ When topping off the tank, reduce flow rate to prevent overflow.
After loading/ unloading	☐ Make sure the transfer operation is completed. ☐ Close all tank and loading valves before disconnecting. ☐ Securely close all vehicles internal, external, and dome cover valves before disconnecting. ☐ Secure all hatches. ☐ Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. ☐ Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

Salt Transfer Procedures

Stage	Tasks
During loading/ unloading	☐ Visually check salt barn for leaks or wet spots. ☐ Verify that sufficient volume is available in the barn or truck when loading.
& After loading/ unloading	☐ Visually verify all salt is inside the salt barn away from any precipitation ☐ Ensure all salt is transferred from truck to barn or from barn to tuck --any spilled salt is immediately swept back into the barn away from drainage area. ☐ Periodically visually inspect salt barn area to insure no salt is leaving the building unintentionally or in contact with precipitation.

3.11 Brittle Fracture Evaluation (40 CFR 112.7(i))

Gasoline and Diesel Fuel Tanks at the facility were shop-built.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))

All storage tanks at this facility are registered with the state and local authorities and have current certificates of registration.

Grosse Ile School District Bus / Transportation Tanks at the facility meet all requirements of Michigan AST regulation, including double-wall construction, and monitoring systems.

Storm water runoff is discharged to the tributary of the Detroit River as permitted under Grosse Ile Township NPDES permit #MIG 619000 COC #MIG610344. Grab samples are taken, following the monitoring requirements specified in the NPDES permit.

PART 4: Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Production Facilities)

4.1 Facility Drainage (40 CFR 112.8(b))

Any potential discharge from ASTs will be restrained by secondary containment structures or land based spill prevention methods. Discharges occurring during loading/unloading operations will be restrained by spill prevention methods (booms, catch basin covers etc).

4.2 Bulk Storage Containers (40 CFR 112.8(c))

Table 4-1 summarizes the construction, volume, and content of bulk storage containers at Grosse Ile School District Bus / Transportation facility.

Table 4-1: List of Oil Containers

Tank	Location	Type (Construction Standard)	Capacity (gallons)	Content	Quantity	Discharge Prevention & Containment
#1	Outside	AST horizontal	1500	Diesel	1	Double-wall. Liquid level gauge. Secondary Containment Alarm
#2	Outside	AST horizontal	500	Gasoline	1	Double-wall. Liquid level gauge. Secondary Containment Alarm

4.2.1 Construction (40 CFR 112.8 (c)(1))

All oil tanks used at this facility are constructed of steel, in accordance with industry specifications. The design and construction of all storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

The AST tanks are of double-wall construction and provide intrinsic secondary containment for the tanks capacity. Since the secondary containment is not open to precipitation, this volume is sufficient to fully contain the product in the event of a leak from the primary container. The container is equipped to prevent overfills as required by EPA policy in its memorandum on double-walled tanks.

4.2.6 Inspections and Tests (40 CFR 112.8(c)(6))

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in The Michigan Fire Prevention Code and STI Standard SP-001. The external inspection includes ultrasonic testing of the shell, as specified in the standard, or if recommended by the certified tank inspector to assess the integrity of the tank for continued oil storage.

Records of certified tank inspections are kept at the facility for at least three years. Shell test comparison records are retained for the life of the tanks.

Table 4-2 summarizes inspections and tests performed on bulk storage containers ("EE" indicates that an environmentally equivalent measure is implemented in place of the inspection/test, as discussed in Section 3.1 of this Plan).

Table 4-2: Scope and Frequency of Bulk Storage Containers Inspections and Tests

	Tank ID	
Inspection/Test	**#1**	**#2**
Visual inspection by facility personnel (as per checklist of Appendix C)	M A	M A
External inspection by certified inspector (as per STI Standard SP-001)	20 yr	20 yr
Internal inspection by certified inspector (as per STI Standard SP-001)	†	†

Legend: M: Monthly
A: Annual
EE: Inspection not required given use of environmentally equivalent measure (refer to Section 3.1 of this Plan).
* Or earlier, as recommended by the certified inspector based on findings from an external inspection.
† Internal inspection may be recommended by the certified inspector based on findings from the external inspection.

The frequency above is based on implementation of a scheduled inspection/testing program. To initiate the program, ASTs will be inspected by the following dates:

< Tank #1 (Diesel): external inspection to be performed by 12-31-2015
< Tank #2 (Gasoline): external inspection to be performed by 12-31-2015

4.2.7 Heating Coils (40 CFR 112.8(c)(7))

N/A

4.2.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))

Tank #1 & #2 is equipped with a level gauge and are equipped with a high level alarm.

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are quickly corrected upon discovery.

Oil is promptly removed from the area and disposed of according to the waste disposal method described in Part 5 of this Plan.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Small portable oil storage containers, which are less than 55 gallons, are stored inside the Transportation building, the floor is sloped to drain away from the door and into floor drains which are part of the sanitary system. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

Transfer operations at this facility include:

< The transfer of oil into or from trucks at the tank location.

Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin.

Part 5: Discharge Response

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- Contact the Manager or his/her alternate;
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix F. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix H.

5.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Grosse Ile School District Bus / Transportation personnel. The following guidelines apply:

- Immediately notify the Manager.
- Under the direction of the Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Manager will complete the discharge notification form (Appendix G) and attach a copy to this SPCC Plan.
- If the discharge involves more than 10 gallons of oil, the Manager will call the Michigan Department of Environmental Protection PEAS number(1-800-292-4706)

5.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge.
- If the Manager is not present at the facility, the senior on-site person notifies the Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. A discharge that threatens the Detroit River may require immediate notification to downstream users such as the drinking water plant, which has an intake located on the Detroit River.
- The Manager (or senior on-site person) must call for medical assistance if workers are injured.
- The Manager (or senior on-site person) must notify the Fire Department or Police Department.
- The Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix F.
- The Manager (or senior on-site person) must immediately contact the Michigan Department of Environmental Quality PEAS (1-800-292-4706) and the National Response Center (1-800-424-8802).

- The Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
- The Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

5.3 Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The Manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor.

5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in Appendix I to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix F and is also posted in prominent locations throughout the facility (e.g. in the Grosse Ile School District Bus / Transportation building).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix F) whenever the facility discharges (as defined in 40 CFR 112.1(b)) *more than 1,000 gallons of oil in a single event,* or discharges (as defined in 40 CFR 112.1(b)) *more than 42 gallons of oil in each of two discharge incidents within a 12-month period.* The following information must be submitted to the EPA Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to MADEP is included in Appendix I of this Plan.

5.5 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors are provided in Appendix F. These contractors have the necessary equipment to respond to a discharge of oil that affects the Detroit River or adjoining shorelines, including floating booms and oil skimmers.

Spill kits are located inside the Bus / Transportation building. The inventory of response supplies and equipment is provided in Appendix H of this Plan. The inventory is verified on a monthly basis. Additional supplies and equipment may be ordered from the following sources:

Inland Waters Pollution Control	(313) 841-5800
Marine Pollution Control	(800) 521-8232

Appendix A
Site Plan and Facility Diagram

Figure A-1: Site Plan.

Figure A-2: Facility Diagram.

SEE SPCC PLAN SITE MAP

Appendix B
Substantial Harm Determination

Facility Name: Grosse Ile School District Bus / Transportation Facility
Facility Address: 790 Grays Drive Grosse Ile Township, MI 48138

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes ○ No ✓

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
Yes ○ No ✓

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes ○ No ●

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
Yes ○ No ●

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes ○ No ●

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name
Signature Linda Drzyzga

Title: *Business /Transportation Manager*

3/29/17
Date

Linda Drzyzga
Name (type or print)

APPENDIX C
Facility Inspection Checklists

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

Monthly Inspection Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
Tank surfaces show signs of leakage			
Tanks are damaged, rusted or deteriorated			
Bolts, rivets, or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Secondary containment is damaged or stained			
Water/product in interstice of double-walled tank			
Piping/Hoses			
Valve seals, gaskets, or other appurtenances are leaking			
Pipelines or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Security			
lighting is non-functional			
Response Equipment			
Response equipment inventory is complete			
Salt Storage			
Salt Barn show signs of leakage			
Salt Barn is damaged or deteriorated			
Salt is outside Salt Barn Structure			
Bus / Transportation Facility Storm Water Management Long-Term Maintenance			
Inspection for sediment accumulation clogging of stone filter			
Inspection -floatables, dead vegetation and debris present			
Erosion and integrity of banks and berms are could be issue			
Review Long term Maintenance schedule and Long Term Maintenance Plan to insure all components are addressed and completed : Including Preventative Maintenance and Remedial Actions			

Date: _____ **Signature:** _____

Annual Facility Inspection Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
Tank 1			
Tank surfaces show signs of leakage			
Tank is damaged, rusted or deteriorated			
Bolts, rivets or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Piping/Hoses			
Valve seals or gaskets are leaking			
hoses or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Warning signs are missing or damaged			
Loading/unloading and transfer equipment			
Drip pans have accumulated oil or are leaking			
Security			
lighting is non-functional			
Response equipment			
Response equipment inventory is incomplete			

Storage tanks			
Tank 2			
Tank surfaces show signs of leakage			
Tank is damaged, rusted or deteriorated			
Bolts, rivets or seams are damaged			
Tank supports are deteriorated or buckled			
Tank foundations have eroded or settled			
Level gauges or alarms are inoperative			
Vents are obstructed			
Piping/Hoses			
Valve seals or gaskets are leaking			
hoses or supports are damaged or deteriorated			
Joints, valves and other appurtenances are leaking			
Warning signs are missing or damaged			

Loading/unloading and transfer equipment			
Drip pans have accumulated oil or are leaking			
Security			
lighting is non-functional			
Response equipment			
Response equipment inventory is incomplete			
Salt Storage			
Salt Barn shows signs of leakage			
Salt Barn is damaged or deteriorated			
Salt is outside Salt Barn Structure			
Bus / Transportation Facility Storm Water Management Long-Term Maintenance			
Review Table Below – All Activities Completed and Implemented			

Table **Storm Water Management System** **Long-Term Maintenance Schedule System Component**	Catch Basins, Inlets & Storm Sewers	Channels & Vegetated Swales	Forebays	Open Detention Basin	Flow Restrictions and Outlet Pipes	Spillways	Rip-rap	Buffer Strip	
Monitoring/Inspection									
Inspect for sediment accumulation**/clogging of stone filter	X	X	X	X	X	X			Annually
Inspect for floatables, dead vegetation and debris	X	X	X	X	X				Annually and after major events
Inspect for erosion and integrity of banks and berms		X	X	X		X	X	X	Annually and after major events
Inspect all components during wet weather and compare to as-built	X	X	X	X	X	X	X	X	Annually
Monitor plantings/vegetation		X	X	X		X		X	2 times per year
Ensure means of access for maintenance remain clear/open	X	X	X	X	X	X	X	X	Annually
Preventive Maintenance									
Mowing		X		X	X	X			Up to 2 times/per, select area only*
Remove and accumulate sediment	X	X	X	X	X				As needed**
Remove floatables, dead vegetation and debris	X	X	X			X			As needed
Replace or wash/reuse stone riser filters					X	X	X		Every 3 years; more frequently as needed***
Remove invasive plant species		X	X	X					Annually
Sweeping of paved surfaces (streets and parking lots)									2 times per year

Remedial Actions									
Repair/stabilize areas of erosion		X	X	X		X	X	X	As needed
Replaced dead plantings, bushes, trees		X	X	X				X	As needed
Reseed bare areas		X	X	X		X		X	As needed
Structural repairs	X				X	X	X		As needed
Make adjustments/repairs to ensure proper functioning	X	X	X	X	X	X	X	X	As needed

* Not to exceed length allowed by local community ordinance.

** Forebays, open detention basins and retention basins to be cleaned whenever sediment accumulates to a depth of 6-12 inches or if sediment resuspention is observed.

*** Replace stone if it cannot be adequately cleaned

NOTE: Chemicals should not be applied to the forebay, detention basin, 25' buffer strip or watercourses.

Annual reminders:

< Hold SPCC Briefing for all oil-handling and salt handling personnel (and update briefing log in the Plan);

< Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed;

Additional Remarks:

Date: _____ Signature: _____

APPENDIX D
Record of Annual Discharge Prevention Briefings and Training

Briefings will be scheduled and conducted by the facility Manager or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Training records available upon request.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX E
Records of Tank Integrity and Pressure Tests

Attach copies of official records of tank integrity and pressure tests.

APPENDIX F
Pollution/ Spill Emergency Contacts

Designated person responsible for spill prevention: ***Linda Drzyzga, Manager 734-564-7316***

EMERGENCY TELEPHONE NUMBERS:

Facility	
Linda Drzyzga, Business Manager	(734) 564-7316
Sue Richardson, Transportation Contact	(734) 558-7025
Bob Newberry, Mechanic	(734) 320-3889
Local Emergency Response	
Grosse Ile Police & Fire Department	911
Oakwood Southshore Hospital	(734) 671- 3800
Henry Ford Wyandotte Hospital	(734) 246- 6000
Response/Cleanup Contractors	
Inland Waters Pollution Control	(734) 841- 5800
Marine Pollution Control	1-800-521- 8232
Notification	
Linda Drzyzga, Business Manager	(734) 564-6405
Wayne County Environmental Hotline	1-888-223-2363
Michigan Department of Environmental Quality, PEAS	1-800-292-4706
National Response Center	1-800-424-8802
United States Environmental Protection Agency, Region 5	1-800-621-8431

APPENDIX G
Discharge Notification Form

Part A: Discharge Information	
General information when reporting a spill to outside authorities: Name: Grosse Ile School District Bus / Transportation Facility Address: 7900 Grays Drive Grosse Ile Township, MI 48138 Telephone: (734) 362-2455 Owner/Operator: Grosse Ile School District 23267 East River Rd Grosse Ile Township, MI 48138 Primary Contact: Linda Drzyzga, Business Manager Work: (734) 362-2578 Cell : (734) 564-7316	
Type of oil:	Discharge Date and Time:
Quantity released:	Discovery Date and Time:
Quantity released to a water body:	Discharge Duration:
Location/Source:	
Actions taken to stop, remove, and mitigate impacts of the discharge:	
Affected media: O air O water O soil	O storm water sewer/POTW O other: _____
Notification person:	Telephone contact: Business: 24-hr:
Nature of discharges, environmental/health effects, and damages: Injuries, fatalities or evacuation required?	

Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Linda Drzyzga, Business Manager (734) 564-7316		

Discharge in amount exceeding 10 gallons and *not affecting a waterbody or groundwater*		
Local Fire Department Fire Chief: Duncan Murdock (734) 676-7157 or 911		
Michigan Department of Environmental Quality Phone 1-800-662-9278		
Grosse Ile Township NPDES Contact DPS Director: Lorinda Beneteau (734) 676-4422 ext 228		
Discharge in any amount and affecting (or threatening to affect) a waterbody		
Local Fire Department Fire Chief: Duncan Murdock (734) 676-7157 or 911		
Wayne County Department of Environment Phone (734) 326-3936		
Michigan Department of Environmental Quality PEAS Phone 1-800-292-4706		
US Coast Guard -National Response Center (800) 424-8802		

APPENDIX H
Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

○	Empty 55-gallons drums to hold contaminated material	_____
○	Loose absorbent material	_____pounds
○	Absorbent pads	_____boxes
○	Nitrile gloves	_____pairs
○	Neoprene gloves	_____pairs
○	Vinyl/PVC pull-on overboots	_____pairs
○	Non-sparking shovels	_____
○	Brooms	_____

APPENDIX I
Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 5 Regional Administrator, and to MADEP, within 60 days of the qualifying discharge incident.

Facility:	*Grosse Ile School District Bus/ Transportation Facility*
Owner/operator:	*Grosse Ile School District* *23276 East River Road* *Grosse Ile, MI 48138*
Name of person filing report:	
Location:	*Grosse Ile School District Bus / Transportation Facility* *7900 Grays Drive* *Grosse Ile, MI 48138*
Maximum storage capacity:	*gallons*
Daily throughput:	*gallons*
Nature of qualifying incident(s): Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons Second discharge exceeding 42 gallons within a 12-month period.	
Description of facility (attach maps, flow diagrams, and topographical maps):	

Agency Notification Standard Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information:

STANDARD OPERATING PROCEDURE
POLLUTION PREVENTION AND GOOD HOUSEKEEPING

SPILL RESPONSE

PREPARED FOR:

THE Township OF Grosse Ile
9601 Groh Road, Grosse Ile, MICHIGAN 48138

APRIL 2017
V2

SECTION A – PERSONNEL

The following Township of Grosse Ile personnel have been identified as key staff in charge of spill response planning, implementation and maintenance of the Spill Response Plan.

Name	Phone
Mark Warnick– Chief of Police	(734) 676-7100
Duncan F. Murdock – Fire Chief	(734) 676-7157
Dale Reaume – Township Manager	(734) 676-4422 Ex. # 236/210

A.1 Responsibilities

- The **Facility Responsible Person** has primary responsibility for coordinating the response to emergencies, including chemical spills
- **Supervisors** should ensure that employees are familiar with these procedures and receive the necessary training
- **All employees** should follow these procedures in the event of a chemical spill

A.2 Emergency Contact Numbers

The following telephone numbers should be posted near telephones and in other conspicuous locations:

Name	Affiliation	Phone
Mark Warnick – Chief of Police	Township Police Department	(734) 676-7100
Duncan F. Murdock – Fire Chief	Township Fire Department	(734) 676-7157
Derek Thiel – DPS Director	Township DPS	(734) 676-4422 Ext # 228
Jon T. Keim, DPS Lead Maintenance	Township DPS	(734) 260-3246
MDEQ 24-Hour Pollution Emergency Alerting System (PEAS)		1-800-292-4706
MDEQ Southeast Michigan District Office		(586) 753-3794
SHVUA Wastewater Treatment Plant		(734) 379-3855
National Response Center		1-800-424-8802
Inland Waters Pollution Control	Environmental Contractor	(734) 841-5800
Marine Pollution Control	Environmental Contractor	1-800-521-8232

SECTION B – CLEAN-UP PROCEDURES

Spilled chemical should be effectively and quickly contained and cleaned up. Employees should clean up spills themselves ***only if properly trained and protected.*** Employees who are not trained in spill cleanup procedures should report the spill to the Responsible Person(s) listed above, warn other employees, and leave the area.

The following general guidelines should be followed for evacuation, spill control, notification of proper authorities, and general emergency procedures in the event of a chemical incident in which there is potential for a significant release of hazardous materials.

B.1 Evacuation

Persons in the immediate vicinity of a spill should *immediately evacuate* the premises (except for employees with training in spill response in circumstances described below). If the spill is of "medium" or "large" size, or if the spill seems hazardous, immediately notify emergency response personnel.

B.2 Spill Control Techniques

Once a spill has occurred, the employee needs to decide whether the spill is small enough to handle without outside assistance. Only employees with training in spill response should attempt to contain or clean up a spill.

NOTE: If you are cleaning up a spill yourself, make sure you are aware of the hazards associated with the materials spilled, have adequate ventilation, and proper personal protective equipment. Treat all residual chemical and cleanup materials as hazardous waste.

Spill control equipment should be located wherever significant quantities of hazardous materials are received or stored. Material Safety Data Sheets (SDSs), absorbents, over-pack containers, container patch kits, spill dams, shovels, floor dry, acid/base neutralizers, and "caution-keep out" signs are common spill response items.

B.3 Spill Response and Clean-up

Chemical spills are divided into three categories: Small, Medium, and Large. Response and cleanup procedures vary depending on the size of the spill.

Small Spills: Any spill where the major dimension is less than 18 inches in diameter. Small spills are generally handled by internal personnel and usually do not require an emergency response by police or fire department HAZMAT teams.

- Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder.
- Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and (nearby electrical

equipment). If serious hazard are present leave the area and call 911. When in doubt consult the SDS for hazards.

- Stop source of spill (plug hole, up-right the container, shut off valve).
- Notify Spill Response Coordinator.
- Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
- If spilled material has entered a storm sewer, check catch basins and attempt to isolate contaminated material. Also, contact **Dale Reaume, Township Manager at 734-676-4422 Ex 236 /210** with a location and description of the spill.
- Clean up spilled material/absorbent (do not flush with water).
- Dispose of cleaned material/absorbent into secure container for proper disposal as required by state and federal law.
- Ensure entire spill area is properly cleaned and all hazards have been removed.
- Complete a Spill Reporting Sheet.

Medium Spills: Spills where the major dimension exceeds 18 inches, but is less than 6 feet. Outside emergency response personnel (police and fire department HAZMAT teams) may be called for medium spills. Common sense, however, will dictate when it is necessary to call them.

- Immediately try to help contain the spill at its source by simple measures only. This means quickly up-righting a container, or putting a lid on a container, if possible. Do not use absorbents unless they are immediately available. Once you have made a quick attempt to contain the spill, or once you have quickly determined you cannot take any brief containment measures, leave the area and alert Emergency Responders at 911. Closing doors behind you while leaving helps contain fumes from spills. Give police accurate information as to the location, chemical, and estimated amount of the spill.
- Evaluate the area outside the spill. Engines and electrical equipment near the spill area must be turned off. This eliminates various sources of ignition in the area. Advise Emergency Responders on how to turn off engines or electrical sources. Do not go back into the spill area once you have left. Help emergency responders by trying to determine how to shut off heating, air conditioning equipment, or air circulating equipment, if necessary.
- If emergency responders evacuate the spill area, follow their instructions in leaving the area.
- After emergency responders have contained the spill, be prepared to assist them with any other information that may be necessary, such as SDSs and questions about the facility. Emergency responders or trained personnel with proper personal protective equipment will then clean up the spill residue. Do not re-enter the area until the responder in charge gives the all clear. Be

prepared to assist these persons from outside the spill area with SDSs, absorbents, and containers.

- Reports must be filed with proper authorities. It is the responsibility of the spiller to inform both his/her supervisor and the emergency responders as to what caused the spill. The response for large spills is similar to the procedures for medium spills, except that the exposure danger is greater.

Large Spills: Any spill involving flammable liquid where the major dimension exceeds 6 feet in diameter; and any "running" spill, where the source of the spill has not been contained or flow has not been stopped.

- Leave the area and notify Emergency Responders (911). Give the operator the spill location, chemical spilled, and approximate amount.
- From a safe area, attempt to get SDS information for the spilled chemical for the emergency responders to use. Also, be prepared to advise responders as to any ignition sources, engines, electrical power, or air conditioning/ventilation systems that may need to be shut off. Advise responders of any absorbents, containers, or spill control equipment that may be available. This may need to be done from a remote area, because an evacuation that would place the spiller far from the scene may be needed. Use radio or phone to assist from a distance, if necessary.
- Only emergency response personnel, in accordance with their own established procedures, should handle spills greater than 6 feet in any dimension or that are continuous. Remember, once the emergency responders or HAZMAT team is on the job cleaning up spills or putting out fires, the area is under their control and no one may re-enter the area until the responder in charge gives the all clear.
- Provide information for reports to supervisors and responders, just as in medium spills.

SECTION C – REPORTING SPILLS

All chemical spills, regardless of size, should be reported as soon as possible to the Facility Responsible Person. The Responsible Person will determine whether the spill has the potential to affect the environment outside of the facility and must be reported to local, state, or federal agencies. Examples of spills that could affect the outside environment include spills that are accompanied by fire or explosion and spills that could reach nearby water bodies.

C.1 Reporting Thresholds

The spill coordinator will report spills to MDEQ PEAS for spills that involve the following:

- Salt spills over 50 pounds or 50 gallons of brine onto the ground or into water (required by Part 5 rules)

- Gasoline release of 32 gallons or more onto the ground (required by Part 201)
- Oil release of 50 pounds (approximately 7½ gallons) onto the ground (required by Part 5 rules)
- Any amount of oil or fuel that reaches surface water or shorelines, call MDEQ PEAS and the National Response Center (as required by the Clean Water Act and Part 31)
- Any spill that is in doubt about reporting

C.2 Reporting Requirements

Within ten (10) days of release, submit a written report for the reportable releases to the following:

- MDEQ Water Resources Division Field Operations Chief, PO Box 30273, Lansing, Michigan 48909-7773
- Wayne County Department of Public Health, 33030 Van Born Road, Wayne, Michigan 48184

Note: the optional report form EPQ 3465 can be found at:
http://www.michigan.gov/deq/0,4561,7-135-3307_29894_5959-20341--,00.html
The MDEQ may request other follow-up reports depending on the situation.

SECTION D – SPILL KIT INVENTORY

The following is a list of spill response equipment that will be maintained by the designated spill response coordinators at all locations where fuel products are stored and dispensed.

D.1 Minimum Spill Response Equipment

- 20 pounds of floor dry
- 1 shovel
- 1 broom
- Caution tape
- 1 Absorbent boom
- Absorbent Socks
- Container for clean-up (30 gallons)
- Sample bottles

SECTION E – PROCESS FOR REVISION

This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

Appendix I

Total Maximum Daily Load (TMDL) Implementation Plan for the Alliance of Downriver Watersheds MS4s in Wayne County

TMDL Plan Approved by Water Resources Division on May 31, 2019
Detroit River TMDL added on August 19, 2019 and approved August 26, 2019

The Michigan Department of Environmental Quality (MDEQ), under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit application, requires a plan or other documentation outlining how each Municipal Separate Stormwater Sewer System (MS4) will "make progress toward achieving the pollutant load reduction requirement" in each TMDL listed in each applicant's application notice. The purpose of this document is to provide the collective watershed plan for **addressing relevant TMDLs in the Alliance of Downriver Watersheds in Wayne County by MS4s** for the purpose of stormwater permit compliance through the permit cycle starting after 2016. This document addresses the permit application sections VII.86 through VII.88. It should be noted that this plan addresses only stormwater sources of impairments related to TMDLs and is not a *comprehensive* TMDL implementation plan.

I. TMDL AND MS4 COVERAGE

This TMDL Plan is submitted on behalf of the following Phase I and II MS4s within the Alliance of Downriver Watersheds, for each of the below-listed TMDLs, with their target loads included:

A. *Excessive bacteria (E. coli), and sediment in the Ecorse River*

Targets: For bacteria, May-October – 300 E. coli per 100 ml daily maximum and 130 E. coli per 100 ml as a 30-day geometric mean. November-April – 1,000 E. coli per 100 ml daily maximum. For sediment, Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

- Allen Park
- Dearborn Heights
- Ecorse
- Inkster
- Lincoln Park
- Melvindale
- Romulus
- Southgate
- Taylor
- Wayne County
- Westland
- Wyandotte

B. *Sediment in Brownstown Creek and Blakely Drain – Marsh Creek*

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

- Gibraltar
- Riverview
- Romulus
- Taylor
- Trenton
- Wayne County
- Woodhaven

C. *Sediment in Frank and Poet Drain*

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Gibraltar	Taylor
Riverview	Trenton
Romulus	Wayne County
Southgate	Woodhaven

D. *Habitat and Flow Alterations in Smith and Silver Creeks*

Note: These creeks are listed on the impaired waters list, but do not have a TMDL developed. While no additional stormwater management effort is required for these, the ADW partners will endeavor to meet the below targets that are used in drainages with existing TMDLs.

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Flat Rock	Wayne County
Gibraltar	Woodhaven
Rockwood	

E. Excessive bacteria (E. coli) in the Detroit River

Targets: May-October – 300 E. coli per 100 ml daily maximum and 130 E. coli per 100 ml as a 30-day geometric mean. November-April – 1,000 E. coli per 100 ml daily maximum.

Allen Park	Southgate
Dearborn Heights	Taylor
Ecorse	Van Buren Township
Gibraltar	Wayne County
Grosse Ile Township	Westland
Inkster	Woodhaven
Lincoln Park	Woodhaven-Brownstown School
Melvindale	District
Riverview	Wyandotte
Romulus	

II. PRIORITIZING AND IMPLEMENTATION BMPS

The MS4s in the Alliance of Downriver Watersheds have put forth substantial effort and resources to reduce the sources of impairments related to the TMDLs listed in the previous section. These partner organizations, along with non-MS4 entities have developed a number of general and specific plans to address watershed impairments. These plans direct the current and future project and program priorities. The suite of projects and programs already put in place contributed to significant impairment reduction, as evidenced by data collected through on-going monitoring (see monitoring report for

details, or in Appendix B for example).

To comply with NPDES stormwater permit requirements, the above-listed MS4s submit that the suite of Best Management Practices (BMPs) contained in the attached Priority Actions table represents each MS4's project priorities that will be implemented during the permit cycle to collectively make progress toward achieving each of the TMDL pollutant load reduction targets. Each MS4 has attached a table of BMPs that identifies the targeted TMDL pollutants (i.e. sediments, flow alterations or bacteria where relevant) and the priority of the BMP. In many cases, no additional prioritization is needed, as the activity is a general (G) stormwater treatment BMP and will be applied across the MS4 and watershed, and not specific to a particular drainage or impairment. For those BMPs that are area or pollutant specific, data from the monitoring program will be used to help establish priorities for implementation. In these cases, BMPs are classified as high (H), medium (M) or low (L) priority for each TMDL. The high priority BMPs will first be implemented in creeksheds or drainage areas that are determined (through monitoring) to be greater sources of the TMDL pollutant or impairment. Conversely, medium and low priority BMPs will be implemented in these TMDL-pollutant source areas after high priority BMPs are implemented.

III. MONITORING PLAN

A summary of past monitoring results and conclusions related to TMDLs in the watershed is included in monitoring reports found on the ADW Initiatives page. The most recent published report is included in Appendix B, but updated monitoring results will be found on the webpage above. The summaries provided are based primarily on data collected through HRWC's Water Quality Monitoring Program, which has been funded in part by MS4s. Currently the MS4s and other watershed partners plan to continue to support this program to seasonally monitor ADW tributaries for TMDL pollutants. However, for the purposes of NPDES stormwater permit compliance, the MS4s commit to the following Monitoring Plan.

1. MS4s will support the collection of water quality samples from sites that are located at or near major tributary mouths. Figure 1 shows a map of the original long-term monitoring sites. An additional site was added as an investigative site in 2016 and then converted to a long-term site thereafter, bringing the total number of long-term sites to nine. The added site is located on the Huron River at the Fort Street bridge crossing. A current map of all water quality monitoring sites is located at the Chemistry and Flow Monitoring website.

2. Samples will be collected at least twice during the permit cycle, not including the data included from previous monitoring. Sampling years will be in year one and year four. At least one sampling event will take place at each of the nine sites. An effort will be made to sample water quality parameters during a representative (i.e. >0.25" and <1.5") wet-weather event. For these wet-weather events, samples will be collected during the rising period of the flow hydrograph or within 6 hours of the peak storm flow. Currently, sampling under the ADW monitoring program occurs much more frequently than this – twice per month, April through September each year, with additional sampling at 3-4 upstream investigative sites each year. Several wet-weather events are sampled during this schedule, plus an autosampler is used to sample multiple times during wet weather events from the beginning of the storm to after peak flow. The ADW plans to continue this monitoring regime, though it commits to twice during the permit cycle.

3. Samples will be collected following procedures identified in ADW's Monitoring Program QAPP (see Appendix A). Samples will be analyzed by the Ypsilanti Community Utility Authority Laboratory or other certified lab for the following concentrations: Total Phosphorus (TP), Total Suspended Solids (TSS), and *E. coli.*

4. Stream flow estimates will be obtained from existing stations during the dates and times water quality samples are collected.

5. The pollutant concentrations and stream flow estimates will be used to update pollutant loading models and estimate pollutant load reductions. These results will be summarized in a brief report to be shared with the public via HRWC and/or MS4 websites at least twice during the permit cycle.

6. Depending on the results from long-term monitoring sites, additional short-term investigative sites will be selected upstream in attempt to identify potential source areas. These sites will be sampled within an hour of sampling at the downstream site so that results can be compared and better define pollutant source locations. Results from this investigation will be shared with the appropriate contacts under the Illicit Discharge Elimination Program (see separate IDEP plan).

7. Any sites with sample results above the previously listed TMDL targets will be resampled to confirm and average results.

8. A plan for implementing BMPs in TMDL areas was developed and described in section II and a list of BMPs to be implemented by MS4s was included with each MS4's permit application. BMP implementation will begin within a year in these areas. If after implementation of high-priority BMPs TMDL targets continue to be exceeded or target parameter values increase in severity, MS4s will re-evaluate the plan and begin implementing additional high or medium-priority BMPs within a year after making this determination. BMPs will be selected for implementation according to the strategy described in section II.

9. Based on a review of year one and year four data and summary reports, BMP implementation will be reviewed and BMP implementation plans may be updated or revised to ensure progress toward achieving TMDL pollutant load reductions. BMPs that are employed will be evaluated using a before and after analysis of the parameter that is deemed impaired in a given TMDL. For bacteria TMDL areas, a sampling event with levels exceeding the single-sample *E. coli* standard will be compared to dry-weather sampling results (during warm-weather, productive months, or other conditions similar to original samples) after the BMP (or suite of BMPs) is deployed.

   For sediment-based TMDLs, wet-weather TSS sample results from before and after BMP implementation will be compared. Ideally, multiple samples will be collected before and several years after BMPs are implemented. A before-after decrease in target parameters will be considered "progress" toward TMDL targets. If the after-implementation results are below target water quality standards, the BMPs will be considered successful at meeting the TMDL targets for the waterbody sampled and the MS4s in the contributing area (watershed). If multiple samples are collected, trend lines will be established to determine the degree of progress towards TMDL targets. Geometric means of qualified (i.e. meeting sampling condition

requirements) post-implementation results will be used for *E. coli*, and simple means will be used for TSS results. Ultimately, to delist an impairment, additional sampling will be needed, which is beyond the scope of MS4 permit requirements to comply with water quality standards.

In addition to this stormwater sampling plan, ADW partners currently collect macroinvertebrates three times a year at sites throughout the Watershed (see Figure 2), which helps track progress towards the primary target of biota (sediment) TMDLs. Improvements in macroinvertebrate diversity (i.e. Procedure 51) will ultimately be necessary for delisting biota impairments. Sampling protocols for macroinvertebrates are also included in Appendix A, and results are reported along with water quality results in summary reports on the ADW Initiatives page. The most recent published complete report (2013) is included in Appendix B. Figure 2 illustrates the Fall 2014 status and trends of macroinvertebrate sampling sites.

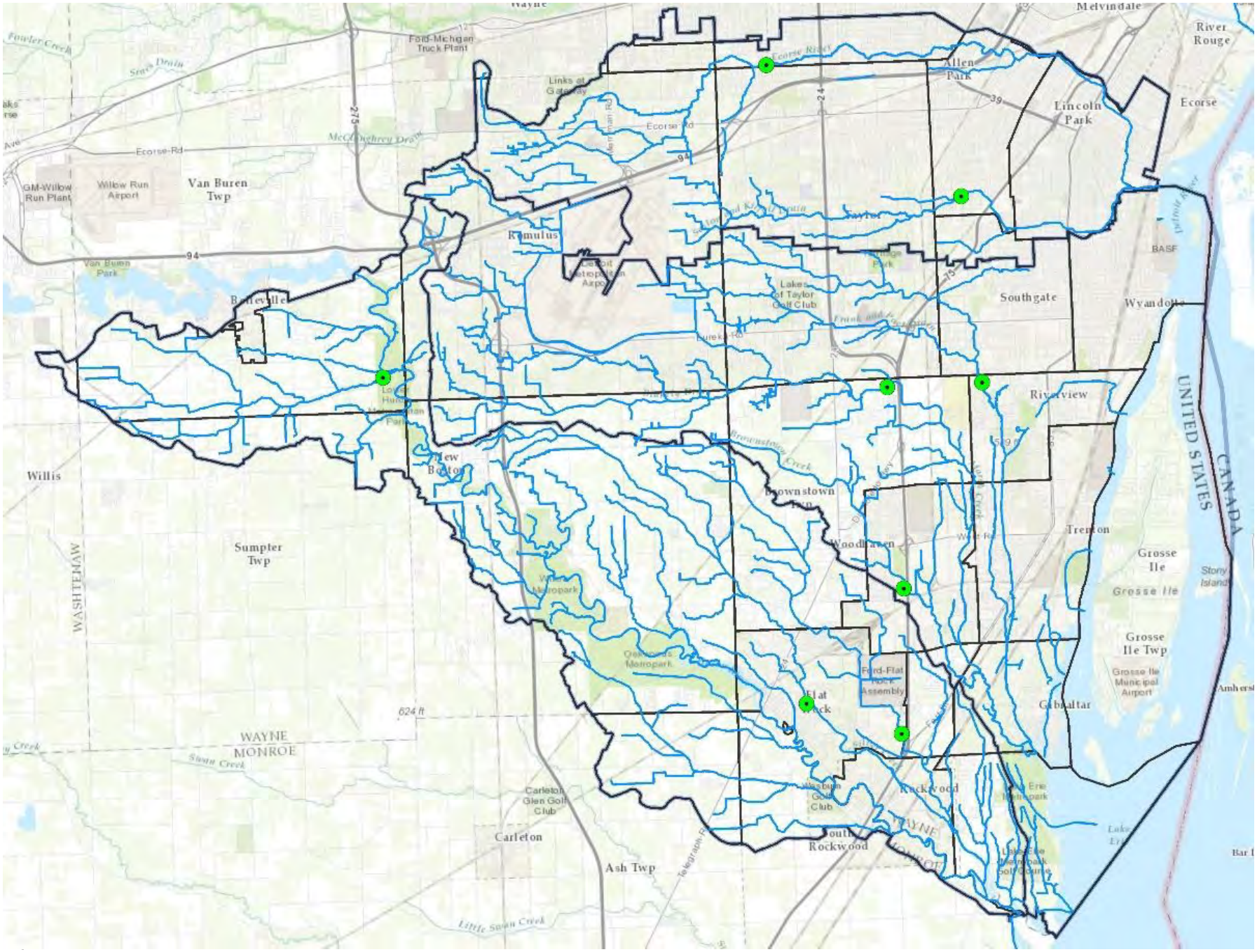

Figure 1. Long-term water quality monitoring stations in the Alliance of Downriver Watersheds

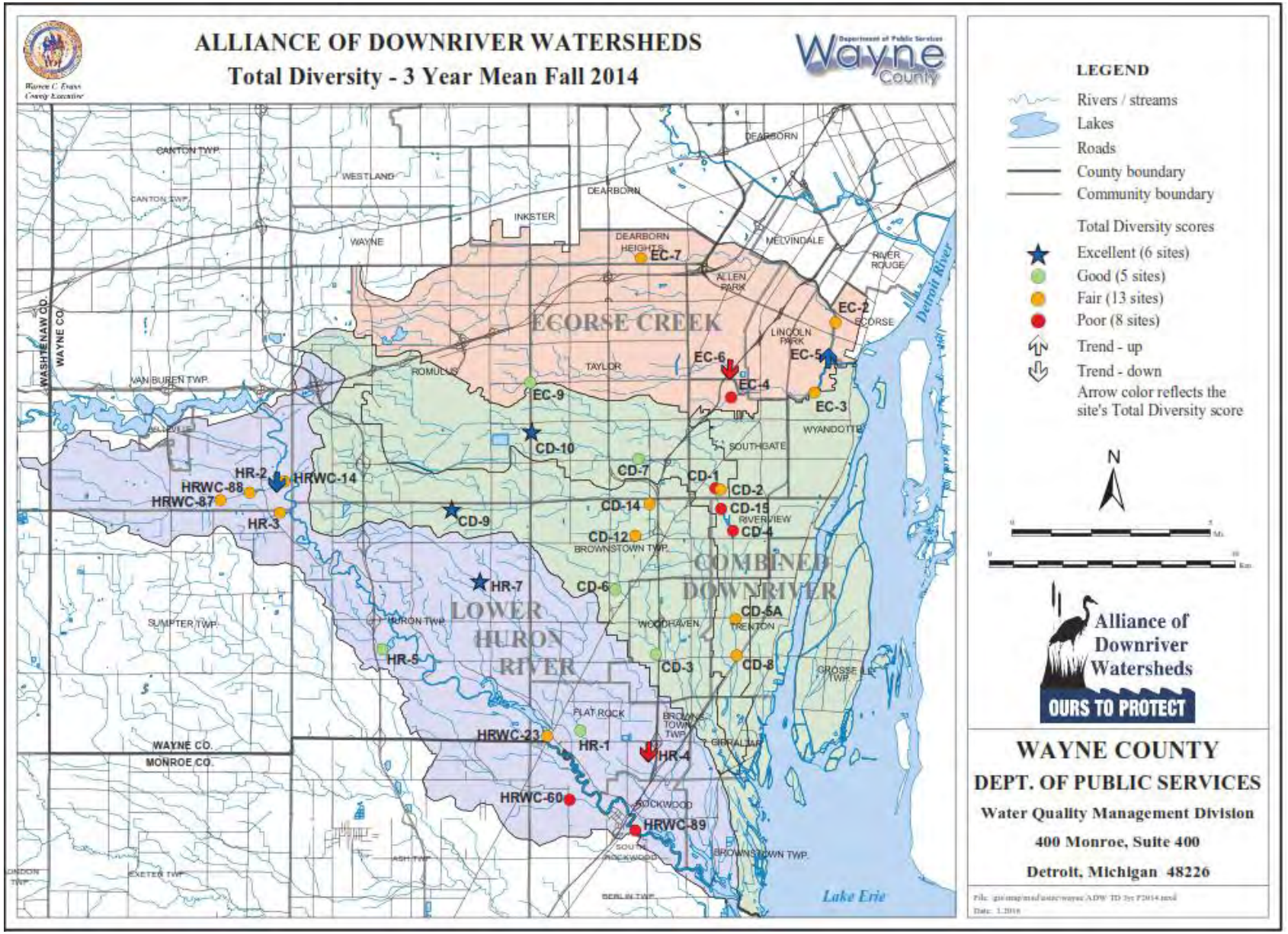

Figure 2. 2014 macroinvertebrate sampling locations and results in ADW.

PERMIT NO. MI0060062

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

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act (33 U.S.C. 1251 *et seq*., as amended; the "Federal Act"); Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); Part 41, Sewerage Systems, of the NREPA; and Michigan Executive Order 2019-06,

Township of Grosse Ile
9601 Groh Road
Grosse Ile, MI 48138

is authorized to discharge from the Municipal Separate Storm Sewer System (MS4)

designated as **Grosse Ile Twp MS4-Wayne**

to surface waters of the state of Michigan in accordance with effluent limitations, monitoring requirements, and other conditions set forth in this permit.

This permit takes effect on June 1, 2021. This permit is based on a complete application submitted on March 18, 2008, as amended through October 28, 2019.

The provisions of this permit are severable. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term in accordance with applicable laws and rules. On its effective date this permit shall supersede Certificate of Coverage No. MIG610344, issued on December 17, 2003, which is hereby revoked upon the effective date of this permit.

This permit and the authorization to discharge shall expire at midnight, **October 1, 2024**. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit an application which contains such information, forms, and fees as are required by the Department of Environment, Great Lakes, and Energy (Department) by **April 4, 2024**.

Issued: May 27, 2021.

Original signed by Christine Alexander
Christine Alexander, Manager
Permits Section
Water Resources Division

PERMIT FEE REQUIREMENTS

In accordance with Section 324.3118 of the NREPA, the permittee shall make payment of an annual storm water fee to the Department for each January 1 the permit is in effect regardless of occurrence of discharge. The permittee shall submit the fee in response to the Department's annual notice. Payment may be made electronically via the Department's MiWaters system. The MiWaters website is located at https://miwaters.deq.state.mi.us. Payment shall be submitted or postmarked by March 15 for notices mailed by February 1. Payment shall be submitted or postmarked no later than 45 days after receiving the notice for notices mailed after February 1.

Annual Permit Fee Classification: Municipal Storm Water – Population Range of more than 1,000 people, but fewer than 3,001

CONTACT INFORMATION

Unless specified otherwise, all contact with the Department required by this permit shall be made to the Warren District Office of the Water Resources Division. The Warren District Office is located at 27700 Donald Court, Warren, MI 48092-2793, Telephone: 586-753-3700, Fax: 586-751-4690.

CONTESTED CASE INFORMATION

Any person who is aggrieved by this permit may file a sworn petition with the Michigan Administrative Hearing System within the Michigan Department of Licensing and Regulatory Affairs, c/o the Michigan Department of Environment, Great Lakes, and Energy, setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Department of Licensing and Regulatory Affairs may reject any petition filed more than 60 days after issuance as being untimely.

PART I

Section A. Limitations and Monitoring Requirements

1. Authorized Discharges

a. Authorized Outfalls and Points of Discharge
This permit authorizes the discharge of storm water from the permittee's MS4 to the surface waters of the state via the outfalls and points of discharge identified in the permittee's application and as modified in accordance with this permit. Such discharges shall be controlled and monitored by the permittee in accordance with this permit.

b. Nested MS4 Discharges
This permit authorizes the discharge of storm water to surface waters of the state from a nested MS4 owned or operated by public bodies that include, but are not limited to, public school districts; public universities; airports; or county, state, or federal agencies. The permittee is responsible for the permit requirements for the nested MS4 associated with the following public body and identified in the application submitted by the permittee: Grosse Ile Township Schools. The permittee may request to modify permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.

c. Discharges Authorized Under Other National Pollutant Discharge Elimination System (NPDES) Permits
This permit does not prohibit the use of an MS4 for other discharges authorized under other NPDES permits, or equivalent Department approval under the NREPA or the Federal Act.

d. Water Quality Requirements
Discharges from the permittee's MS4 shall not cause or contribute to an exceedance of water quality standards in the receiving waters. This includes, but is not limited to, the requirement set forth in R 323.1050 of the Water Quality Standards stating that the receiving waters shall not have any of the following unnatural physical properties as a result of the discharge, in quantities which are or may become injurious to any designated use: turbidity, color, oil films, floating solids, foams, settleable solids, suspended solids, or deposits.

2. Outfall or Point of Discharge Identified, Constructed, or Installed After Permit Issuance

a. Outfall or Point of Discharge Within the Permittee's Regulated Area
Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located within the permittee's regulated area as identified in the application. For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:

1) whether the discharge is from an outfall or point of discharge;

2) the outfall or point of discharge identification number assigned by the permittee;

3) the surface water of the state receiving the discharge from the outfall or point of discharge;

4) a certification statement that the outfall or point of discharge is within the permittee's regulated area as identified in the application;

5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes best management practices (BMPs) to comply with the minimum requirements of the permit for the outfall or point of discharge; and

6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map required in Part I.A.3.d.1) of this permit.

b. Outfall or Point of Discharge Outside the Permittee's Regulated Area
Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located outside the permittee's regulated area as identified in the application (e.g., area served by an expanded MS4 or area previously served by a combined sewer system that is now separated). For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:

1) whether the discharge is from an outfall or point of discharge;

2) the outfall or point of discharge identification number assigned by the permittee;

3) the surface water of the state receiving the discharge from the outfall or point of discharge;

4) a map identifying the expanded regulated area served by the permittee's MS4;

5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes BMPs to comply with the minimum requirements of the permit for the outfall or point of discharge and expanded regulated area; and

6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the expanded regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map as required in Part I.A.3.d.1) of this permit.

c. Upon review of the request to authorize the discharge from an outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit in accordance with Part I.A.2.a. or Part I.A.2.b. of this permit, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required.

3. Storm Water Management Program (SWMP)

The permittee submitted a SWMP with its application for an NPDES permit. The permittee shall implement the approved SWMP to comply with the minimum requirements identified in this permit. The SWMP shall cover the regulated area served by, or otherwise contributing to discharges from, the MS4 owned or operated by the permittee identified in the application, including nested MS4s. The permittee shall implement and enforce the SWMP to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the NREPA and the Federal Act. The approved SWMP is an enforceable part of this permit and any Department approved modifications made to the SWMP shall also become enforceable parts of this permit.

a. Enforcement Response Procedure (ERP)
The permittee shall implement the ERP for violations of the permittee's ordinances or regulatory mechanisms identified in the SWMP to the maximum extent practicable. The ERP shall be implemented to compel compliance with the permittee's ordinances and/or regulatory mechanisms and to deter continuing violations.

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The permittee shall track and document all enforcement conducted pursuant to the permittee's ERP. At a minimum, the permittee shall track and document the following: the name of the person responsible for violating the permittee's ordinance or regulatory mechanism; the date and location of the violation; a description of the violation; a description of the enforcement response used; a schedule for returning to compliance; and the date the violation was resolved.

b. Public Participation/Involvement Program (PPP)
The permittee shall implement the PPP to encourage public participation/involvement in the implementation and periodic review of the SWMP to the maximum extent practicable. The permittee shall implement the PPP as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PPP or part of the PPP, therefore each permittee working collaboratively is responsible for complying with the PPP as described in the SWMP.

The PPP requires implementation of the following minimum requirements:

1) The procedure for making the SWMP available for public inspection and comment, including complying with local public notice requirements, as appropriate; and

2) The procedure for inviting public participation and involvement in the implementation and periodic review of the SWMP.

c. Public Education Program (PEP)
The permittee shall implement the PEP as part of the SWMP to the maximum extent practicable. At the minimum, the PEP shall promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water runoff. The PEP shall be implemented to achieve measurable improvements in the public's understanding of storm water pollution and efforts to reduce the impacts of storm water pollution. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PEP or part of the PEP, therefore each permittee working collaboratively is responsible for complying with the PEP as described in the SWMP.

The permittee shall implement the PEP in accordance with the procedure for prioritizing the following PEP topics based on high-priority, community-wide issues and targeted issues to reduce pollutant loads to storm water to the maximum extent practicable.

The PEP requires implementation of the following minimum requirements:

1) BMPs to address the following PEP topics:

(a) Promote public responsibility and stewardship in the permittee's watershed.

(b) Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges can have on surface waters of the state.

(c) Educate the public on illicit discharges and promote public reporting on illicit discharges and improper disposal of materials into the MS4.

(d) Promote preferred cleaning materials and procedures for car, pavement, and power washing.

(e) Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.

(f) Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.

(g) Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids.

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(h) Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.

(i) Educate the public on, and promote the benefits of, green infrastructure and Low Impact Development.

(j) Promote methods for managing riparian lands to protect water quality.

(k) Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to storm water runoff.

2) The procedure for determining the overall effectiveness of implementation and the process for modifying the PEP to address ineffective implementation. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the PEP. The Department will notify the permittee if a modification is required.

d. Illicit Discharge Elimination Program (IDEP)
The permittee shall implement and enforce the IDEP to detect and eliminate illicit discharges and connections to the permittee's MS4. The permittee shall implement the IDEP as part of the SWMP to the maximum extent practicable. The permittee has chosen to work collaboratively with watershed or regional partners to implement the IDEP or part of the IDEP, therefore each permittee working collaboratively is responsible for complying with the IDEP as described in the SWMP.

The IDEP requires implementation of the following minimum requirements:

1) An available, up-to-date storm sewer system map identifying the following: the storm sewer system, location of all outfalls and points of discharge the permittee owns or operates in the regulated area, and the names and location of all surface waters of the state that receive discharges from the permittee's MS4. The map shall be retained by the permittee and made available to the Department upon request. The map shall be maintained and updated as outfalls and points of discharge are identified, constructed, and installed in accordance with Part I.A.2. of this permit.

2) The plan to detect and eliminate non-storm water discharges to the permittee's MS4, including illegal dumping/spills. The plan includes the following:

a) A procedure for identifying priority areas for field observations. The permittee shall conduct field observations in accordance with the procedure identifying the priority area(s) developed as part of the IDEP.

b) A procedure for conducting field observations, field screening, and source investigations. The permittee shall conduct a field observation in accordance with the procedure during dry-weather at least once during the term of the permit. Field screening and source investigation shall be conducted in accordance with the schedule in the procedure.

Field observations, field screening, and source investigations shall include the following:

(1) Field Observation – The permittee shall observe the outfall or point of discharge for the following during dry-weather in accordance with the procedure: presence/absence of flow, water clarity, color, odor, floatable materials, deposits/stains on the discharge structure and bank, vegetation condition, structural condition, and biology (e.g. bacterial sheens, algae, and slimes).

(2) Field Screening – If flow is observed at an outfall or point of discharge, the permittee shall analyze the flow for the indicator parameters identified in the procedure. If the source of an illicit discharge is identified during the field observation, field screening may not be necessary.

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(3) Source Investigation – If the source of the illicit discharge was not identified by the field screening, the permittee shall conduct an investigation to identify the source in accordance with the procedure. If the permittee opts to use tracer dyes, the discharge of the dyes shall be authorized in accordance with Part I.A.6. of this permit.

If the permittee is made aware of non-storm water discharges outside the priority areas, illegal dumping/spills, or complaints received, the permittee shall conduct field observations and follow-up field screening and source investigations as appropriate in accordance with the procedure, including the schedule, in the IDEP. The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state in accordance with Part II.C.7. of this permit.

c) A procedure for responding to illicit discharges and pursuing enforcement action. The permittee shall implement the procedure to respond and pursue enforcement action once the source of the illicit discharge is identified, including the corrective action required to eliminate the illicit discharge. The permittee shall also implement the procedure to respond to illegal spills/dumping. For each illicit discharge not eliminated within 90 days of its discovery, the permittee shall provide, with the next progress report due, a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.

3) The employee training program, which includes the following:

a) Training on techniques for identifying illicit discharges and connections, including field observations, field screening, and source investigations;

b) Training on procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response; and

c) A schedule and requirement for training at least once during the term of the permit for existing staff and within the first year of hire for new staff.

4) The procedure for IDEP evaluation and determining the overall effectiveness of the IDEP.

e. Construction Storm Water Runoff Control Program

The permittee shall implement the construction storm water runoff control program to address areas of construction activity that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale. The permittee shall implement the construction storm water runoff control program as part of the SWMP to the maximum extent practicable.

The construction storm water runoff control program requires implementation of the following minimum requirements:

1) The procedure to notify the Part 91 Agency, or appropriate staff (if the permittee is a Part 91 Agency), when soil or sediment is discharged to the permittee's MS4 from a construction activity.

2) The procedure to notify the Department when soil, sediment, or other pollutants are discharged to the permittee's MS4 from a construction activity.

3) The procedure for ensuring that construction activity one (1) acre or greater in total earth disturbance with the potential to discharge to the permittee's MS4 obtains a Part 91 permit or is conducted by an approved Authorized Public Agency, as appropriate.

4) The procedure to advise the landowner or recorded easement holder of the State of Michigan Permit by Rule (R 323.2190 of the Part 21 Rules promulgated pursuant to Part 31 of the NREPA).

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f. Post-Construction Storm Water Runoff Program

The permittee certified in its application for this permit that no new development or redevelopment projects that disturb (1) or more acres, including projects less than one (1) acre that are a part of a larger common plan of development or sale, and that discharge to the permittee's MS4 will occur during the permit term. As such, the permittee is not authorized to implement a Post-Construction Storm Water Runoff Program as part of this permit.

If the permittee chooses to develop a site, either as new development or redevelopment, that disturbs (1) or more acres, including projects less than one (1) acre that are a part of a larger common plan of development or sale, and that discharge to the permittee's MS4 during the permit term, the permittee shall submit a Post-Construction Storm Water Runoff Program for approval at least 180 days prior to commencement of site development. The proposed Post-Construction Storm Water Program shall meet the requirements of the current MS4 application form available at the time of the submittal and include a draft ordinance or regulatory mechanism. If the Department determines that the Post-Construction Storm Water Program is approvable, the permit shall be modified in accordance with applicable laws and rules to modify the previously approved SWMP.

g. Pollution Prevention and Good Housekeeping Activities for Municipal Operations

The permittee shall implement the pollution prevention and good housekeeping program with the goal of preventing or reducing pollutant runoff from municipal facilities and operations that discharge storm water to surface waters of the state. The permittee shall implement the program as part of the SWMP to the maximum extent practicable.

1) Municipal Facility and Structural Storm Water Control Inventory

The permittee shall make available to the Department upon request an up-to-date map or maps of the facilities and structural storm water controls owned or operated by the permittee with a discharge to surface waters of the state in the regulated area. In accordance with the procedure for updating and revising the permittee's facility inventory and map(s), the permittee shall submit to the Department the type and location for any new facility obtained or constructed during this permit term with a discharge of storm water to surface waters of the state and the information requested in Part I.A.2. of the permit.

2) Facility-Specific Storm Water Management

The permittee shall implement the facility-specific standard operating procedure (SOP) for each facility the permittee identified as having the high potential to discharge pollutants to surface waters of the state. The permittee shall implement the BMPs identified in the procedure to prevent or reduce pollutant runoff at each facility the permittee identified as having the medium or low potential to discharge pollutants to surface waters of the state. The permittee shall assess new facilities for the potential to discharge pollutants to surface waters of the state in accordance with the procedure to determine a priority level. High-priority facilities shall include permittee-owned or operated fleet maintenance and storage yards unless a demonstration is submitted and approved by the Department demonstrating how the permittee's fleet maintenance or storage yard has the low potential to discharge pollutants to surface waters of the state. The assessment shall be submitted in writing to the Department for approval <u>within 30 days</u> of ownership or operation of the new facility. The permittee shall certify in writing to the Department that a facility-specific SOP is being implemented <u>within 90 days</u> of ownership or operation of a new high-priority facility. <u>Within 90 days</u> of ownership or operation, the permittee shall certify in writing to the Department that BMPs are being implemented in accordance with the procedure developed to prevent or reduce pollutant runoff at each new medium- or low-priority facility. For new facilities, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required. The permittee shall document all other changes to the facility assessment as part of the progress report and as an update to the procedure.

The facility-specific SOP shall be kept at the site described in the SOP and made available upon request by the Department. The facility-specific SOP for each high-priority facility shall include implementation of the following.

a) Structural and non-structural storm water controls to prevent or reduce the discharge of pollutants to surface waters of the state.

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b) Up-to-date list of significant materials stored on-site that could pollute storm water with a description of the handling and storage requirements and potential to discharge for each significant material.

c) Good housekeeping practices including, but not limited to, maintaining a clean and orderly facility, properly storing and covering materials, and minimizing pollutant sources to prevent or reduce pollutant runoff.

d) Routine maintenance and inspections of storm water management and control devices to ensure materials and equipment are clean and orderly and prevent or reduce pollutant runoff. The written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.

e) Comprehensive site inspections at least once every six (6) months. The comprehensive site inspection shall include an inspection of all structural storm water controls and a review of non-structural storm water controls to prevent or reduce pollutant runoff. A written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.

3) Structural Storm Water Control Operation and Maintenance Activities

a) The permittee shall implement the procedures for inspecting, cleaning, and maintaining permittee-owned or operated catch basins in the regulated area using the priority level assigned to each catch basin. The permittee shall document changes to the priority level for a catch basin as part of the progress report and as an update to the procedure.

The permittee shall also implement the procedure for dewatering and disposal of materials extracted from the catch basins in accordance with Part 111 (Hazardous Waste), Part 115 (Solid Waste), and Part 121 (Liquid Industrial Waste) of the NREPA.

b) The permittee shall implement the procedure for inspecting and maintaining permittee-owned or operated structural storm water controls other than catch basins in the regulated area. The permittee shall document changes to the procedure as part of the progress report and as an update to the procedure.

c) The permittee shall implement the procedure requiring that new permittee-owned or operated facilities or structural storm water controls to address water quantity be designed and implemented in accordance with the post-construction storm water runoff performance standards and long-term operation and maintenance requirements in Part I.A.3.f. of this permit.

4) Municipal Operations and Maintenance Activities

a) The permittee shall implement the procedure, including the BMPs identified, to prevent or reduce pollutant runoff from the permittee's operation and maintenance activities identified in the SWMP. The permittee shall document changes to the assessment of operation and maintenance activities for the potential to discharge pollutants to surface waters of the state as part of the progress report and as an update to the procedure.

b) The permittee shall implement the procedure for the street sweeping program for permittee-owned or operated streets, parking lots, or other impervious infrastructure in the regulated area using the sweeping methods and assigned priority levels identified in the procedure. The permittee shall document changes to the priority level for a street, parking lot, or other impervious infrastructure as part of the progress report and as an update to the procedure.

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The permittee shall also implement the procedure for dewatering and disposal of street sweeper waste material.

5) Managing Vegetated Properties

The permittee shall implement the procedure requiring the permittee's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land.

6) Employee Training

The permittee shall implement the employee training program to train employees involved in implementing pollution prevention and good housekeeping activities. At a minimum, existing staff shall be trained once during the permit cycle and new hire employees within the first year of their hire date.

7) Contractor Requirements and Oversight

The permittee shall implement the procedure requiring contractors hired by the permittee to perform municipal operation and maintenance activities that comply with the permittee's pollution prevention and good housekeeping program and contractor oversight to ensure compliance.

h. Total Maximum Daily Load (TMDL) Implementation Plan

The permittee shall implement the TMDL Implementation Plan to reduce the discharge of pollutants from the permittee's MS4 to make progress in meeting Water Quality Standards. The permittee shall implement the TMDL Implementation Plan as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement this plan or part of the plan, therefore each permittee is responsible for complying with the plan as described in the SWMP.

The following TMDL is applicable to the discharge from the permittee's MS4:

Name of TMDL	Pollutant of Concern
Detroit River	*E. coli*

The permittee shall implement the prioritized BMPs included in the TMDL Implementation Plan during the permit cycle to make progress in achieving the pollutant load reduction requirement in the TMDL. The permittee shall review, update, and revise the list of BMPs implemented as part of the TMDL Implementation Plan in accordance with the procedure included in the SWMP. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the TMDL Implementation Plan. The Department will notify the permittee if a modification is required.

The permittee shall implement the monitoring plan included in the TMDL Implementation Plan for assessing the effectiveness of the BMPs implemented in making progress toward achieving the TMDL pollutant load reduction. Available monitoring data shall be submitted with each progress report.

4. SWMP Modifications

a. SWMP Modifications Requested by the Permittee

Modifications to the previously approved SWMP may be requested by the permittee as follows:

1) Modifications adding BMPs (but not replacing, subtracting, or affecting the level of implementation of any other BMP) to the previously approved SWMP may be made by the permittee at any time upon written notification to the Department. Notification shall include a description of the modification, which may include a description of a new BMP with a corresponding measurable goal. Upon notification to the Department, the modification is considered an enforceable part of the approved SWMP.

2) Modifications replacing an ineffective or unfeasible BMP identified in the previously approved SWMP with an alternative BMP may be requested at any time by written notification to the Department. The ineffective or unfeasible BMP identified shall not be replaced in the previously approved SWMP unless the replacement is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:

a) an analysis of why the BMP is ineffective or unfeasible (including cost-prohibitive);

b) a measurable goal for the replacement BMP; and

c) an analysis of why the replacement BMP is expected to achieve the intent of the BMP to be replaced.

3) Modifications subtracting an ineffective or unfeasible BMP identified in the previously approved SWMP may be requested by written notification to the Department. The identified BMP shall not be subtracted from the previously approved SWMP unless the subtraction is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:

a) an analysis of why the BMP is ineffective or unfeasible (including cost prohibitive); and

b) a determination of why the removal of the BMP will not change the permittee's ability to comply with the permit requirements.

b. Modifications Required by the Department
The Department may require the permittee to modify the SWMP as needed to:

1) address contributions from the permittee's MS4 discharge that impair receiving water quality;

2) include more stringent requirements necessary to comply with new state or federal statutory or regulatory requirements; and/or

3) include such other conditions deemed necessary by the Department to comply with the goals and requirements of the Federal Act or the NREPA, including the requirement to reduce the discharge of pollutants from the MS4 to the maximum extent practicable.

5. Request for Approval to Use Water Treatment Additives

This permit does not authorize the use of any water treatment additive without prior written approval from the Department. Such approval is authorized under separate correspondence. Water treatment additives include any materials that are added to water used at the facility, or to wastewater generated by the facility, to condition or treat the water. Permittees proposing to use water treatment additives, including a proposed increased concentration of a previously approved water treatment additive, shall submit a request for approval via the Department's MiWaters system. The MiWaters website is located at https://miwaters.deq.state.mi.us. Instructions for submitting such a request may be obtained at http://www.michigan.gov/npdes (near the bottom of that page, click on one or both of the links located under the Water Treatment Additives banner). Additional monitoring and reporting may be required as a condition of approval to use the water treatment additive.

A request for approval to use water treatment additives shall include all of the following usage and discharge information for each water treatment additive proposed to be used:

a. The Safety Data Sheet (SDS);

b. Ingredient information, including the name of each ingredient, CAS number for each ingredient, and fractional content by weight for each ingredient;

c. The proposed water treatment additive discharge concentration with supporting calculations;

d. The discharge frequency (i.e., number of hours per day and number of days per year);

e. The outfall(s) and monitoring point(s) from which the water treatment additive is to be discharged;

f. The type of removal treatment, if any, that the water treatment additive receives prior to discharge;

g. The water treatment additive's function (i.e., microbiocide, flocculant, etc.);

h. The SDS shall include a 48-hour LC50 or EC50 for a North American freshwater planktonic crustacean (either *Ceriodaphnia* sp., *Daphnia* sp., or *Simocephalus* sp.); The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated; and

i. The SDS shall include the results of a toxicity test for one (1) other North American freshwater aquatic species (other than a planktonic crustacean) that meets a minimum requirement of R 323.1057(2) of the Water Quality Standards. The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated. Examples of tests that would meet this requirement include a 96-hour LC50 for rainbow trout, bluegill, or fathead minnow.

6. Tracer Dye Discharges

This permit does not authorize the discharge of tracer dyes without approval from the Department. Requests to discharge tracer dyes shall be submitted to the Department in accordance with Rule 1097 (R 323.1097 of the Michigan Administrative Code).

7. Storm Water Program Manager (Facility Contact)

The "Facility Contact" was specified in the application. The permittee may replace the facility contact at any time, and shall notify the Department in writing within 10 days after replacement (including the name, address and telephone number of the new facility contact).

a. The facility contact shall be (or a duly authorized representative of this person):
- for a corporation, a principal executive officer of at least the level of vice president; or a designated representative if the representative is responsible for the overall operation of the facility from which the discharge originates, as described in the permit application or other NPDES form,
- for a partnership, a general partner,
- for a sole proprietorship, the proprietor, or
- for a municipal, state, or other public facility, either a principal executive officer, the mayor, village president, city or village manager or other duly authorized employee.

b. A person is a duly authorized representative only if:
- the authorization is made in writing to the Department by a person described in paragraph a. of this section; and
- the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the facility (a duly authorized representative may thus be either a named individual or any individual occupying a named position).

Nothing in this section obviates the permittee from properly submitting reports and forms as required by law.

PART I

Section B. Program Assessment and Reporting

1. Progress Reports

Progress reports shall be submitted on or before November 1, 2021, April 1, 2023, and on or before April 1 every two (2) years following. The Department may approve alternate dates for progress report submittal if requested and adequately justified by the permittee. Each progress report shall contain the following information for the entire period that has elapsed since the last progress report submittal (i.e., the reporting cycle):

a. Compliance Assessment
The permittee shall describe the status of compliance with the approved SWMP identified in Part I.A.3 of this permit. The permittee shall assess and describe the appropriateness of the BMPs identified in the SWMP. The report shall describe the progress made towards achieving the identified measurable goals for each of the BMPs, and specific evaluation criteria as follows:

1) For the PEP, provide a summary of the evaluation of the overall effectiveness of the PEP, using the evaluation methods described in the PEP.

2) For the IDEP, provide a summary of the evaluation and determination of the overall effectiveness of the IDEP, using the evaluation methods described in the IDEP. For each illicit discharge that was not eliminated within 90 days of its discovery the permittee shall provide a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.

3) If applicable, the permittee shall submit to the Department any new outfall or point of discharge information as required in Part I.A.2. of this permit.

4) For the TMDL Implementation Plan, if monitoring data is available in accordance with the monitoring plan, provide an assessment of progress made toward achieving the TMDL pollutant load reduction requirement.

b. Data and Results
The permittee shall provide a summary of all of the information collected and analyzed, including monitoring data, if any, during the reporting cycle.

c. Upcoming Activities
The permittee shall provide a summary of the BMPs to be implemented during the next reporting cycle.

d. Changes to BMPs and Measurable Goals
The permittee shall describe any changes to BMPs or measurable goals in the approved SWMP. In accordance with the permit, these changes will be reviewed to determine if a permit modification is necessary. The Department will notify the permittee if a permit modification is required.

e. Notice of Changes in Nested Jurisdiction Agreements
The permittee shall identify any nested jurisdictions that enter into or terminate permit agreements with the permittee which were not identified in the SWMP. The permittee may request to modify the permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval in accordance with Part I.A.1.b. of this permit. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.

f. Required Signatures
All reports required by this permit, and other information requested by the Department, shall be signed by either a principal executive officer or ranking elected official, or by a duly authorized representative of that person in accordance with 40 CFR 122.22(b).

PART II

Part II may include terms and /or conditions not applicable to discharges covered under this permit.

Section A. Definitions

Acute toxic unit (TU_A) means $100/LC_{50}$ where the LC_{50} is determined from a whole effluent toxicity (WET) test which produces a result that is statistically or graphically estimated to be lethal to 50% of the test organisms.

Annual monitoring frequency refers to a calendar year beginning on January 1 and ending on December 31. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

Authorized public agency means a state, local, or county agency that is designated pursuant to the provisions of Section 9110 of Part 91, Soil and Sedimentation Control, of the NREPA, to implement soil erosion and sedimentation control requirements with regard to construction activities undertaken by that agency.

Best management practices (BMPs) means structural devices or nonstructural practices that are designed to prevent pollutants from entering into storm water, to direct the flow of storm water, or to treat polluted storm water.

Bioaccumulative chemical of concern (BCC) means a chemical which, upon entering the surface waters, by itself or as its toxic transformation product, accumulates in aquatic organisms by a human health bioaccumulation factor of more than 1000 after considering metabolism and other physiochemical properties that might enhance or inhibit bioaccumulation. The human health bioaccumulation factor shall be derived according to R 323.1057(5). Chemicals with half-lives of less than 8 weeks in the water column, sediment, and biota are not BCCs. The minimum bioaccumulation concentration factor (BAF) information needed to define an organic chemical as a BCC is either a field-measured BAF or a BAF derived using the biota-sediment accumulation factor (BSAF) methodology. The minimum BAF information needed to define an inorganic chemical as a BCC, including an organometal, is either a field-measured BAF or a laboratory-measured bioconcentration factor (BCF). The BCCs to which these rules apply are identified in Table 5 of R 323.1057 of the Water Quality Standards.

Biosolids are the solid, semisolid, or liquid residues generated during the treatment of sanitary sewage or domestic sewage in a treatment works. This includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes and a derivative of the removed scum or solids.

Bulk biosolids means biosolids that are not sold or given away in a bag or other container for application to a lawn or home garden.

CAFO means concentrated animal feeding operation.

Certificate of Coverage (COC) is a document, issued by the Department, which authorizes a discharge under a general permit.

Chronic toxic unit (TU_C) means 100/MATC or $100/IC_{25}$, where the maximum acceptable toxicant concentration (MATC) and IC_{25} are expressed as a percent effluent in the test medium.

Class B biosolids refers to material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PSRP) in accordance with the Part 24 Rules, Land Application of Biosolids, promulgated under Part 31 of the NREPA. Processes include aerobic digestion, composting, anaerobic digestion, lime stabilization and air drying.

Combined sewer system is a sewer system in which storm water runoff is combined with sanitary wastes.

Composite sample is a sample collected over time, either by continuous sampling or by mixing discrete samples. A composite sample represents the average wastewater characteristics during the compositing period. Various methods for compositing are available and are based on either time or flow-proportioning, the choice of which will depend on the permit requirements.

Continuous monitoring refers to sampling/readings that occur at regular and consistent intervals throughout a 24-hour period and at a frequency sufficient to capture data that are representative of the discharge. The maximum acceptable interval between samples/readings shall be one (1) hour.

PART II

Section A. Definitions

Daily concentration
FOR PARAMETERS OTHER THAN pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – Daily concentration is the sum of the concentrations of the individual samples of a parameter taken within a calendar day divided by the number of samples taken within that calendar day. The daily concentration will be used to determine compliance with any maximum and minimum daily concentration limitations. For guidance and examples showing how to perform calculations using results below quantification levels, see the document entitled "Reporting Results Below Quantification," available at https://www.michigan.gov/documents/deq/wrd-npdes-results-quantification_620791_7.pdf.

FOR pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – The daily concentration used to determine compliance with maximum daily pH, temperature, and conductivity limitations is the highest pH, temperature, and conductivity readings obtained within a calendar day. The daily concentration used to determine compliance with minimum daily pH and dissolved oxygen limitations is the lowest pH and dissolved oxygen readings obtained within a calendar day.

Daily loading is the total discharge by weight of a parameter discharged during any calendar day. This value is calculated by multiplying the daily concentration by the total daily flow and by the appropriate conversion factor. The daily loading will be used to determine compliance with any maximum daily loading limitations. When required by the permit, report the maximum calculated daily loading for the month in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMRs.

Daily monitoring frequency refers to a 24-hour day. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

Department means the Michigan Department of Environment, Great Lakes, and Energy.

Detection level means the lowest concentration or amount of the target analyte that can be determined to be different from zero by a single measurement at a stated level of probability.

Discharge means the addition of any waste, waste effluent, wastewater, pollutant, or any combination thereof to any surface water of the state.

EC_{50} means a statistically or graphically estimated concentration that is expected to cause 1 or more specified effects in 50% of a group of organisms under specified conditions.

Fecal coliform bacteria monthly
FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a discharge event. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR. If the period in which the discharge event occurred was partially in each of two months, the calculated monthly value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a reporting month. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR.

PART II

Section A. Definitions

Fecal coliform bacteria 7-day
FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days of discharge during a discharge event. If the number of daily concentrations determined during the discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean value for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs. If the 7-day period was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days in a reporting month. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs. The first calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

Flow-proportioned composite sample is a composite sample in which either a) the volume of each portion of the composite is proportional to the effluent flow rate at the time that portion is obtained, or b) a constant sample volume is obtained at varying time intervals proportional to the effluent flow rate.

General permit means an NPDES permit authorizing a category of similar discharges.

Geometric mean is the average of the logarithmic values of a base 10 data set, converted back to a base 10 number.

Grab sample is a single sample taken at neither a set time nor flow.

IC_{25} means the toxicant concentration that would cause a 25% reduction in a nonquantal biological measurement for the test population.

Illicit connection means a physical connection to a municipal separate storm sewer system that primarily conveys non-storm water discharges other than uncontaminated groundwater into the storm sewer; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

Illicit discharge means any discharge to, or seepage into, a municipal separate storm sewer system that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or litter; collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

Individual permit means a site-specific NPDES permit.

Inlet means a catch basin, roof drain, conduit, drain tile, retention pond riser pipe, sump pump, or other point where storm water or wastewater enters into a closed conveyance system prior to discharge off site or into waters of the state.

PART II

Section A. Definitions

Interference is a discharge which, alone or in conjunction with a discharge or discharges from other sources, both: 1) inhibits or disrupts a POTW, its treatment processes or operations, or its sludge processes, use or disposal; and 2) therefore, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or, of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including state regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act. [This definition does not apply to sample matrix interference].

Land application means spraying or spreading biosolids or a biosolids derivative onto the land surface, injecting below the land surface, or incorporating into the soil so that the biosolids or biosolids derivative can either condition the soil or fertilize crops or vegetation grown in the soil.

LC_{50} means a statistically or graphically estimated concentration that is expected to be lethal to 50% of a group of organisms under specified conditions.

Maximum acceptable toxicant concentration (MATC) means the concentration obtained by calculating the geometric mean of the lower and upper chronic limits from a chronic test. A lower chronic limit is the highest tested concentration that did not cause the occurrence of a specific adverse effect. An upper chronic limit is the lowest tested concentration which did cause the occurrence of a specific adverse effect and above which all tested concentrations caused such an occurrence.

Maximum extent practicable means implementation of best management practices by a public body to comply with an approved storm water management program as required by a national permit for a municipal separate storm sewer system, in a manner that is environmentally beneficial, technically feasible, and within the public body's legal authority.

MBTU/hr means million British Thermal Units per hour.

MGD means million gallons per day.

Monthly concentration is the sum of the daily concentrations determined during a reporting period divided by the number of daily concentrations determined. The calculated monthly concentration will be used to determine compliance with any maximum monthly concentration limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly concentration in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR.

For minimum percent removal requirements, the monthly influent concentration and the monthly effluent concentration shall be determined. The calculated monthly percent removal, which is equal to 100 times the quantity [1 minus the quantity (monthly effluent concentration divided by the monthly influent concentration)], shall be reported in the "MINIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs.

Monthly loading is the sum of the daily loadings of a parameter divided by the number of daily loadings determined during a reporting period. The calculated monthly loading will be used to determine compliance with any maximum monthly loading limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly loading in the "AVERAGE" column under "QUANTITY OR LOADING" on the DMR.

Monthly monitoring frequency refers to a calendar month. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

Municipal separate storm sewer means a conveyance or system of conveyances designed or used for collecting or conveying storm water which is not a combined sewer and which is not part of a POTW as defined in the Code of Federal Regulations at 40 CFR 122.2.

PART II

Section A. Definitions

Municipal separate storm sewer system (MS4) means all separate storm sewers that are owned or operated by the United States, a state, city, village, township, county, district, association, or other public body created by or pursuant to state law, having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law, such as a sewer district, flood control district, or drainage district, or similar entity, or a designated or approved management agency under Section 208 of the Clean Water Act that discharges to the waters of the state. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

National Pretreatment Standards are the regulations promulgated by or to be promulgated by the Federal Environmental Protection Agency pursuant to Section 307(b) and (c) of the Clean Water Act. The standards establish nationwide limits for specific industrial categories for discharge to a POTW.

No observed adverse effect level (NOAEL) means the highest tested dose or concentration of a substance which results in no observed adverse effect in exposed test organisms where higher doses or concentrations result in an adverse effect.

Noncontact cooling water is water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product or finished product.

Nondomestic user is any discharger to a POTW that discharges wastes other than or in addition to water-carried wastes from toilet, kitchen, laundry, bathing or other facilities used for household purposes.

Nonstructural controls are practices or procedures implemented by employees at a facility to manage storm water or to prevent contamination of storm water.

NPDES means National Pollutant Discharge Elimination System.

Outfall is the location at which a point source discharge first enters a surface water of the state.

Part 91 agency means an agency that is designated by a county board of commissioners pursuant to the provisions of Section 9105 of Part 91 of the NREPA; an agency that is designated by a city, village, or township in accordance with the provisions of Section 9106 of Part 91 of the NREPA; or the Department for soil erosion and sedimentation control activities under Part 615, Supervisor of Wells; Part 631, Reclamation of Mining Lands; or Part 632, Nonferrous Metallic Mineral Mining, of the NREPA, pursuant to the provisions of Section 9115 of Part 91 of the NREPA.

Part 91 permit means a soil erosion and sedimentation control permit issued by a Part 91 agency pursuant to the provisions of Part 91 of the NREPA.

Partially treated sewage is any sewage, sewage and storm water, or sewage and wastewater, from domestic or industrial sources that is treated to a level less than that required by the permittee's NPDES permit, or that is not treated to national secondary treatment standards for wastewater, including discharges to surface waters from retention treatment facilities.

Point of discharge is the location of a point source discharge where storm water is discharged directly into a separate storm sewer system.

Point source discharge means a discharge from any discernible, confined, discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, or rolling stock. Changing the surface of land or establishing grading patterns on land will result in a point source discharge where the runoff from the site is ultimately discharged to waters of the state.

Polluting material means any material, in solid or liquid form, identified as a polluting material under the Part 5 Rules, Spillage of Oil and Polluting Materials, promulgated under Part 31 of the NREPA (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

POTW is a publicly owned treatment work.

PART II

Section A. Definitions

Predevelopment is the last land use prior to the planned new development or redevelopment.
Pretreatment is reducing the amount of pollutants, eliminating pollutants, or altering the nature of pollutant properties to a less harmful state prior to discharge into a public sewer. The reduction or alteration can be by physical, chemical, or biological processes, process changes, or by other means. Dilution is not considered pretreatment unless expressly authorized by an applicable National Pretreatment Standard for a particular industrial category.

Public (as used in the MS4 individual permit) means all persons who potentially could affect the authorized storm water discharges, including, but not limited to, residents, visitors to the area, public employees, businesses, industries, and construction contractors and developers.

Public body means the United States; the state of Michigan; a city, village, township, county, school district, public college or university, or single-purpose governmental agency; or any other body which is created by federal or state statute or law.

Qualified Personnel means an individual who meets qualifications acceptable to the Department and who is authorized by an Industrial Storm Water Certified Operator to collect the storm water sample.

Qualifying storm event means a storm event causing greater than 0.1 inch of rainfall and occurring at least 72 hours after the previous measurable storm event that also caused greater than 0.1 inch of rainfall. Upon request, the Department may approve an alternate definition meeting the condition of a qualifying storm event.

Quantification level means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.

Quarterly monitoring frequency refers to a three month period, defined as January through March, April through June, July through September, and October through December. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

Regional Administrator is the Region 5 Administrator, U.S. EPA, located at R-19J, 77 W. Jackson Blvd., Chicago, Illinois 60604.

Regulated area means the permittee's urbanized area, where urbanized area is defined as a place and its adjacent densely-populated territory that together have a minimum population of 50,000 people as defined by the United States Bureau of the Census and as determined by the latest available decennial census.

Secondary containment structure means a unit, other than the primary container, in which significant materials are packaged or held, which is required by state or federal law to prevent the escape of significant materials by gravity into sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface waters or groundwaters of the state.

Separate storm sewer system means a system of drainage, including, but not limited to, roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels, which is not a combined sewer where storm water mixes with sanitary wastes, and is not part of a POTW.

Significant industrial user is a nondomestic user that: 1) is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; or 2) discharges an average of 25,000 gallons per day or more of process wastewater to a POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the permittee as defined in 40 CFR 403.12(a) on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's treatment plant operation or violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

PART II

Section A. Definitions

Significant materials means any material which could degrade or impair water quality, including but not limited to: raw materials; fuels; solvents, detergents, and plastic pellets; finished materials such as metallic products; hazardous substances designated under Section 101(14) of the 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 Emergency Planning and Community Right-to-Know Act (EPCRA); polluting materials as identified under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code); Hazardous Wastes as defined in Part 111, Hazardous Waste Management, of the NREPA; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges.

Significant spills and significant leaks means any release of a polluting material reportable under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

Special-use area means storm water discharges for which the Department has determined that additional monitoring is needed from: secondary containment structures required by state or federal law; lands on Michigan's List of Sites of Environmental Contamination pursuant to Part 201, Environmental Remediation, of the NREPA; and/or areas with other activities that may contribute pollutants to the storm water.

Stoichiometric means the quantity of a reagent calculated to be necessary and sufficient for a given chemical reaction.

Storm water means storm water runoff, snow melt runoff, surface runoff and drainage, and non-storm water included under the conditions of this permit.

Storm water discharge point is the location where the point source discharge of storm water is directed to surface waters of the state or to a separate storm sewer. It includes the location of all point source discharges where storm water exits the facility, including *outfalls* which discharge directly to surface waters of the state, and *points of discharge* which discharge directly into separate storm sewer systems.

Structural controls are physical features or structures used at a facility to manage or treat storm water.

SWPPP means the Storm Water Pollution Prevention Plan prepared in accordance with this permit.

Tier I value means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier I toxicity database.

Tier II value means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier II toxicity database.

Total maximum daily loads (TMDLs) are required by the Clean Water Act for waterbodies that do not meet water quality standards. TMDLs represent the maximum daily load of a pollutant that a waterbody can assimilate and meet water quality standards, and an allocation of that load among point sources, nonpoint sources, and a margin of safety.

Toxicity reduction evaluation (TRE) means a site-specific study conducted in a stepwise process designed to identify the causative agents of effluent toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in effluent toxicity.

Water Quality Standards means the Part 4 Water Quality Standards promulgated pursuant to Part 31 of the NREPA, being R 323.1041 through R 323.1117 of the Michigan Administrative Code.

PART II

Section A. Definitions

Weekly monitoring frequency refers to a calendar week which begins on Sunday and ends on Saturday. When required by this permit, an analytical result, reading, value, or observation shall be reported for that period if a discharge occurs during that period. If the calendar week begins in one month and ends in the following month, the analytical result, reading, value, or observation shall be reported in the month in which monitoring was conducted.

WWSL is a wastewater stabilization lagoon.

WWSL discharge event is a discrete occurrence during which effluent is discharged to the surface water up to 10 days of a consecutive 14-day period.

3-portion composite sample is a sample consisting of three equal-volume grab samples collected at equal intervals over an 8-hour period.

7-day concentration
FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily concentrations determined. If the number of daily concentrations determined during the WWSL discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations. When required by the permit, report the maximum calculated 7-day concentration for the WWSL discharge event in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days in a reporting month divided by the number of daily concentrations determined. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations in the reporting month. When required by the permit, report the maximum calculated 7-day concentration for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

PART II

Section A. Definitions

7-day loading
FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily loadings determined. If the number of daily loadings determined during the WWSL discharge event is less than 7 days, the number of actual daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations. When required by the permit, report the maximum calculated 7-day loading for the WWSL discharge event in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days in a reporting month divided by the number of daily loadings determined. If the number of daily loadings determined is less than 7, the actual number of daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations in the reporting month. When required by the permit, report the maximum calculated 7-day loading for the month in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

24-hour composite sample is a flow-proportioned composite sample consisting of hourly or more frequent portions that are taken over a 24-hour period and in which the volume of each portion is proportional to the discharge flow rate at the time that portion is taken. A time-proportioned composite sample may be used upon approval from the Department if the permittee demonstrates it is representative of the discharge.

PART II

Section B. Monitoring Procedures

1. Representative Samples

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations promulgated pursuant to Section 304(h) of the Clean Water Act (40 CFR Part 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants), unless specified otherwise in this permit. **Test procedures used shall be sufficiently sensitive to determine compliance with applicable effluent limitations**. For lists of approved test methods, go to https://www.epa.gov/cwa-methods. Requests to use test procedures not promulgated under 40 CFR Part 136 for pollutant monitoring required by this permit shall be made in accordance with the Alternate Test Procedures regulations specified in 40 CFR 136.4. These requests shall be submitted to the Manager of the Permits Section, Water Resources Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30458, Lansing, Michigan, 48909-7958. The permittee may use such procedures upon approval.

The permittee shall periodically calibrate and perform maintenance procedures on all analytical instrumentation at intervals to ensure accuracy of measurements. The calibration and maintenance shall be performed as part of the permittee's laboratory Quality Assurance/Quality Control program.

3. Instrumentation

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring instrumentation at intervals to ensure accuracy of measurements.

4. Recording Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information: 1) the exact place, date, and time of measurement or sampling; 2) the person(s) who performed the measurement or sample collection; 3) the dates the analyses were performed; 4) the person(s) who performed the analyses; 5) the analytical techniques or methods used; 6) the date of and person responsible for equipment calibration; and 7) the results of all required analyses.

5. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Department.

PART II

Section C. Reporting Requirements

1. Start-Up Notification

The permittee shall notify the Department of start-up if one of the following conditions applies and in accordance with the applicable condition:

a. Non-CAFOs

1) **If this is an individual permit** and the permittee will not discharge during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to commencement of the discharge.

2) **If this is a general permit** and the permittee will not discharge during the first 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to commencement of the discharge.

b. CAFOs

1) **If this is an individual permit** and the permittee will not populate with animals during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to populating with animals.

2) **If this is a general permit** and the permittee will not populate with animals during 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to populating with animals.

2. Submittal Requirements for Self-Monitoring Data

Part 31 of the NREPA (specifically Section 324.3110(7)); and R 323.2155(2) of Part 21, Wastewater Discharge Permits, promulgated under Part 31 of the NREPA, allow the Department to specify the forms to be utilized for reporting the required self-monitoring data. Unless instructed on the effluent limitations page to conduct "Retained Self-Monitoring," the permittee shall submit self-monitoring data via the Department's MiWaters system.

The permittee shall utilize the information provided on the MiWaters website, located at https://miwaters.deq.state.mi.us, to access and submit the electronic forms. Both monthly summary and daily data shall be submitted to the Department no later than the 20th day of the month following each month of the authorized discharge period(s). The permittee may be allowed to submit the electronic forms after this date if the Department has granted an extension to the submittal date.

PART II

Section C. Reporting Requirements

3. Retained Self-Monitoring Requirements

If instructed on the effluent limits page (or otherwise authorized by the Department in accordance with the provisions of this permit) to conduct retained self-monitoring, the permittee shall maintain a year-to-date log of retained self-monitoring results and, upon request, provide such log for inspection to the staff of the Department. Retained self-monitoring results are public information and shall be promptly provided to the public upon request.

The permittee shall certify, in writing, to the Department, on or before January 10th (April 1st for animal feeding operation facilities) of each year, that: 1) all retained self-monitoring requirements have been complied with and a year-to-date log has been maintained; and 2) the application on which this permit is based still accurately describes the discharge. With this annual certification, the permittee shall submit a summary of the previous year's monitoring data. The summary shall include maximum values for samples to be reported as daily maximums and/or monthly maximums and minimum values for any daily minimum samples.

Retained self-monitoring may be denied to a permittee by notification in writing from the Department. In such cases, the permittee shall submit self-monitoring data in accordance with Part II.C.2., above. Such a denial may be rescinded by the Department upon written notification to the permittee. Reissuance or modification of this permit or reissuance or modification of an individual permittee's authorization to discharge shall not affect previous approval or denial for retained self-monitoring unless the Department provides notification in writing to the permittee.

4. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report. Such increased frequency shall also be indicated.

Monitoring required pursuant to Part 41 of the NREPA or Rule 35 of the Mobile Home Park Commission Act, 1987 PA 96, as amended, for assurance of proper facility operation, shall be submitted as required by the Department.

5. Compliance Dates Notification

Within 14 days of every compliance date specified in this permit, the permittee shall submit a written notification to the Department via MiWaters (https://miwaters.deq.state.mi.us) indicating whether or not the particular requirement was accomplished. If the requirement was not accomplished, the notification shall include an explanation of the failure to accomplish the requirement, actions taken or planned by the permittee to correct the situation, and an estimate of when the requirement will be accomplished. If a written report is required to be submitted by a specified date and the permittee accomplishes this, a separate written notification is not required.

PART II

Section C. Reporting Requirements

6. Noncompliance Notification

Compliance with all applicable requirements set forth in the Clean Water Act, Parts 31 and 41 of the NREPA, and related regulations and rules is required. All instances of noncompliance shall be reported as follows:

a. 24-Hour Reporting
Any noncompliance which may endanger health or the environment (including maximum and/or minimum daily concentration discharge limitation exceedances) shall be reported, verbally, within 24 hours from the time the permittee becomes aware of the noncompliance by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC). A written submission shall also be provided via MiWaters (https://miwaters.deq.state.mi.us) within five (5) days.

b. Other Reporting
The permittee shall report, in writing via MiWaters (https://miwaters.deq.state.mi.us), all other instances of noncompliance not described in a. above at the time monitoring reports are submitted; or, in the case of retained self-monitoring, within five (5) days from the time the permittee becomes aware of the noncompliance.

Reporting shall include: 1) a description of the discharge and cause of noncompliance; 2) the period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue; and 3) the steps taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

7. Spill Notification

The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state, unless the permittee has determined that the release is not in excess of the threshold reporting quantities specified in the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code), by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if the notice is provided after regular working hours, by calling the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

Within 10 days of the release, the permittee shall submit to the Department via MiWaters (https://miwaters.deq.state.mi.us) a full written explanation as to the cause of the release, the discovery of the release, response measures (clean-up and/or recovery) taken, and preventive measures taken or a schedule for completion of measures to be taken to prevent reoccurrence of similar releases.

PART II

Section C. Reporting Requirements

8. Upset Noncompliance Notification

If a process "upset" (defined as an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee) has occurred, the permittee who wishes to establish the affirmative defense of upset shall notify the Department by telephone within 24 hours of becoming aware of such conditions; and within five (5) days, provide in writing, the following information:

a. that an upset occurred and that the permittee can identify the specific cause(s) of the upset;

b. that the permitted wastewater treatment facility was, at the time, being properly operated and maintained (note that an upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation); and

c. that the permittee has specified and taken action on all responsible steps to minimize or correct any adverse impact in the environment resulting from noncompliance with this permit.

No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

In any enforcement proceedings, the permittee, seeking to establish the occurrence of an upset, has the burden of proof.

9. Bypass Prohibition and Notification

a. Bypass Prohibition
Bypass is prohibited, and the Department may take an enforcement action, unless:

1) bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

2) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass; and

3) the permittee submitted notices as required under b. or c. below.

b. Notice of Anticipated Bypass
If the permittee knows in advance of the need for a bypass, the permittee shall submit written notification to the Department before the anticipated date of the bypass. This notification shall be submitted at least 10 days before the date of the bypass; however, the Department will accept fewer than 10 days advance notice if adequate explanation for this is provided. The notification shall provide information about the anticipated bypass as required by the Department. The Department may approve an anticipated bypass, after considering its adverse effects, if it will meet the three (3) conditions specified in a. above.

c. Notice of Unanticipated Bypass
As soon as possible but no later than 24 hours from the time the permittee becomes aware of the unanticipated bypass, the permittee shall notify the Department by calling the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if notification is provided after regular working hours, call the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

d. Written Report of Bypass
A written submission shall be provided within five (5) working days of commencing any bypass to the Department, and at additional times as directed by the Department. The written submission shall contain a description of the bypass and its cause; the period of bypass, including exact dates and times, and if the bypass has not been corrected, the anticipated time it is expected to continue; steps taken or

planned to reduce, eliminate, and prevent reoccurrence of the bypass; and other information as required by the Department.

e. Bypass Not Exceeding Limitations
The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to ensure efficient operation. These bypasses are not subject to the provisions of a., b., c., and d., above. This provision does not relieve the permittee of any notification responsibilities under Part II.C.11. of this permit.

f. Definitions

1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

10. Bioaccumulative Chemicals of Concern (BCC)

Consistent with the requirements of R 323.1098 and R 323.1215 of the Michigan Administrative Code, the permittee is prohibited from undertaking any action that would result in a lowering of water quality from an increased loading of a BCC unless an increased use request and antidegradation demonstration have been submitted and approved by the Department.

PART II

Section C. Reporting Requirements

11. Notification of Changes in Discharge

The permittee shall notify the Department, via MiWaters (https://miwaters.deq.state.mi.us), as soon as possible but within no more than 10 days of knowing, or having reason to believe, that any activity or change has occurred or will occur which would result in the discharge of: 1) detectable levels of chemicals on the current Michigan Critical Materials Register, priority pollutants or hazardous substances set forth in 40 CFR 122.21, Appendix D, or the Pollutants of Initial Focus in the Great Lakes Water Quality Initiative specified in 40 CFR 132.6, Table 6, which were not acknowledged in the application or listed in the application at less than detectable levels; 2) detectable levels of any other chemical not listed in the application or listed at less than detection, for which the application specifically requested information; or 3) any chemical at levels greater than five times the average level reported in the complete application (see the first page of this permit, for the date(s) the complete application was submitted). Any other monitoring results obtained as a requirement of this permit shall be reported in accordance with the compliance schedules.

12. Changes in Facility Operations

Any anticipated action or activity, including but not limited to facility expansion, production increases, or process modification, which will result in new or increased loadings of pollutants to the receiving waters must be reported to the Department by a) submission of an increased use request (application) and all information required under R 323.1098 (Antidegradation) of the Water Quality Standards or b) by written notice if the following conditions are met: 1) the action or activity will not result in a change in the types of wastewater discharged or result in a greater quantity of wastewater than currently authorized by this permit; 2) the action or activity will not result in violations of the effluent limitations specified in this permit; 3) the action or activity is not prohibited by the requirements of Part II.C.10.; and 4) the action or activity will not require notification pursuant to Part II.C.11. Following such written notice, the permit or, if applicable, the facility's COC, may be modified according to applicable laws and rules to specify and limit any pollutant not previously limited.

13. Transfer of Ownership or Control

In the event of any change in ownership or control of facilities from which the authorized discharge emanates, the following requirements apply: Not less than 30 days prior to the actual transfer of ownership or control – for non-CAFOs, or within 30 days of the actual transfer of ownership or control – for CAFOs, the permittee shall submit to the Department via MiWaters (https://miwaters.deq.state.mi.us) a written agreement between the current permittee and the new permittee containing: 1) the legal name and address of the new owner; 2) a specific date for the effective transfer of permit responsibility, coverage and liability; and 3) a certification of the continuity of or any changes in operations, wastewater discharge, or wastewater treatment.

If the new permittee is proposing changes in operations, wastewater discharge, or wastewater treatment, the Department may propose modification of this permit in accordance with applicable laws and rules.

14. Operations and Maintenance Manual

For wastewater treatment facilities that serve the public (and are thus subject to Part 41 of the NREPA), Section 4104 of Part 41 and associated Rule 2957 of the Michigan Administrative Code allow the Department to require an Operations and Maintenance (O&M) Manual from the facility. An up-to-date copy of the O&M Manual shall be kept at the facility and shall be provided to the Department upon request. The Department may review the O&M Manual in whole or in part at its discretion and require modifications to it if portions are determined to be inadequate.

At a minimum, the O&M Manual shall include the following information: permit standards; descriptions and operation information for all equipment; staffing information; laboratory requirements; record keeping requirements; a maintenance plan for equipment; an emergency operating plan; safety program information; and copies of all pertinent forms, as-built plans, and manufacturer's manuals.

PART II

Section C. Reporting Requirements

Certification of the existence and accuracy of the O&M Manual shall be submitted to the Department at least sixty days prior to start-up of a new wastewater treatment facility. Recertification shall be submitted sixty days prior to start-up of any substantial improvements or modifications made to an existing wastewater treatment facility.

15. Signatory Requirements

All applications, reports, or information submitted to the Department in accordance with the conditions of this permit and that require a signature shall be signed and certified as described in the Clean Water Act and the NREPA.

The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

The NREPA (Section 3115(2)) provides that a person who at the time of the violation knew or should have known that he or she discharged a substance contrary to this part, or contrary to a permit, COC, or order issued or rule promulgated under this part, or who intentionally makes a false statement, representation, or certification in an application for or form pertaining to a permit or COC or in a notice or report required by the terms and conditions of an issued permit or COC, or who intentionally renders inaccurate a monitoring device or record required to be maintained by the Department, is guilty of a felony and shall be fined not less than $2,500.00 or more than $25,000.00 for each violation. The court may impose an additional fine of not more than $25,000.00 for each day during which the unlawful discharge occurred. If the conviction is for a violation committed after a first conviction of the person under this subsection, the court shall impose a fine of not less than $25,000.00 per day and not more than $50,000.00 per day of violation. Upon conviction, in addition to a fine, the court in its discretion may sentence the defendant to imprisonment for not more than 2 years or impose probation upon a person for a violation of this part. With the exception of the issuance of criminal complaints, issuance of warrants, and the holding of an arraignment, the circuit court for the county in which the violation occurred has exclusive jurisdiction. However, the person shall not be subject to the penalties of this subsection if the discharge of the effluent is in conformance with and obedient to a rule, order, permit, or COC of the Department. In addition to a fine, the attorney general may file a civil suit in a court of competent jurisdiction to recover the full value of the injuries done to the natural resources of the state and the costs of surveillance and enforcement by the state resulting from the violation.

16. Electronic Reporting

Upon notice by the Department that electronic reporting tools are available for specific reports or notifications, the permittee shall submit electronically via MiWaters (https://miwaters.deq.state.mi.us) all such reports or notifications as required by this permit, on forms provided by the Department.

PART II

Section D. Management Responsibilities

1. Duty to Comply

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit, more frequently than, or at a level in excess of, that authorized, shall constitute a violation of the permit.

It is the duty of the permittee to comply with all the terms and conditions of this permit. Any noncompliance with the Effluent Limitations, Special Conditions, or terms of this permit constitutes a violation of the NREPA and/or the Clean Water Act and constitutes grounds for enforcement action; for permit or COC termination, revocation and reissuance, or modification; or denial of an application for permit or COC renewal.

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2. Operator Certification

The permittee shall have the waste treatment facilities under direct supervision of an operator certified at the appropriate level for the facility certification by the Department, as required by Sections 3110 and 4104 of the NREPA. Permittees authorized to discharge storm water shall have the storm water treatment and/or control measures under direct supervision of a storm water operator certified by the Department, as required by Section 3110 of the NREPA.

3. Facilities Operation

The permittee shall, at all times, properly operate and maintain all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures.

4. Power Failures

In order to maintain compliance with the effluent limitations of this permit and prevent unauthorized discharges, the permittee shall either:

a. provide an alternative power source sufficient to operate facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit; or

b. upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce or otherwise control production and/or all discharge in order to maintain compliance with the effluent limitations and conditions of this permit.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize or prevent any adverse impact to the surface waters or groundwaters of the state resulting from noncompliance with any effluent limitation specified in this permit including, but not limited to, such accelerated or additional monitoring as necessary to determine the nature and impact of the discharge in noncompliance.

PART II

Section D. Management Responsibilities

6. Containment Facilities

The permittee shall provide facilities for containment of any accidental losses of polluting materials in accordance with the requirements of the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code). For a POTW, these facilities shall be approved under Part 41 of the NREPA.

7. Waste Treatment Residues

Residuals (i.e. solids, sludges, biosolids, filter backwash, scrubber water, ash, grit, or other pollutants or wastes) removed from or resulting from treatment or control of wastewaters, including those that are generated during treatment or left over after treatment or control has ceased, shall be disposed of in an environmentally compatible manner and according to applicable laws and rules. These laws may include, but are not limited to, the NREPA, Part 31 for protection of water resources, Part 55 for air pollution control, Part 111 for hazardous waste management, Part 115 for solid waste management, Part 121 for liquid industrial wastes, Part 301 for protection of inland lakes and streams, and Part 303 for wetlands protection. Such disposal shall not result in any unlawful pollution of the air, surface waters or groundwaters of the state.

8. Right of Entry

The permittee shall allow the Department, any agent appointed by the Department, or the Regional Administrator, upon the presentation of credentials and, for animal feeding operation facilities, following appropriate biosecurity protocols:

a. to enter upon the permittee's premises where an effluent source is located or any place in which records are required to be kept under the terms and conditions of this permit; and

b. at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect process facilities, treatment works, monitoring methods and equipment regulated or required under this permit; and to sample any discharge of pollutants.

9. Availability of Reports

Except for data determined to be confidential under Section 308 of the Clean Water Act and Rule 2128 (R 323.2128 of the Michigan Administrative Code), all reports prepared in accordance with the terms of this permit and required to be submitted to the Department shall be available for public inspection via MiWaters (https://miwaters.deq.state.mi.us). As required by the Clean Water Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Clean Water Act and Sections 3112, 3115, 4106 and 4110 of the NREPA.

10. Duty to Provide Information

The permittee shall furnish to the Department via MiWaters (https://miwaters.deq.state.mi.us), within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or the facility's COC, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

PART II

Section E. Activities Not Authorized by This Permit

1. Discharge to the Groundwaters

This permit does not authorize any discharge to the groundwaters. Such discharge may be authorized by a groundwater discharge permit issued pursuant to the NREPA.

2. POTW Construction

This permit does not authorize or approve the construction or modification of any physical structures or facilities at a POTW. Approval for the construction or modification of any physical structures or facilities at a POTW shall be by permit issued under Part 41 of the NREPA.

3. Civil and Criminal Liability

Except as provided in permit conditions on "Bypass" (Part II.C.9. pursuant to 40 CFR 122.41(m)), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond the permittee's control, such as accidents, equipment breakdowns, or labor disputes.

4. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee may be subject under Section 311 of the Clean Water Act except as are exempted by federal regulations.

5. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

6. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize violation of any federal, state or local laws or regulations, nor does it obviate the necessity of obtaining such permits, including any other Department of Environment, Great Lakes, and Energy permits, or approvals from other units of government as may be required by law.