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

version 1.8

(Submission #: 2QC-AXV8-46ZW, version 5)

## Details

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**Submission ID** 2QC-AXV8-46ZW

**Submission Reason** Renewal

**Status** Complete

## Form Input

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### Existing Permit Details

**Existing Permit ID (Read Only)**

2643678287753082527

**Existing Permit Number (Read Only)**

MIG610350

### Section 1. Applicant Information

#### Applicant Information

**Prefix**

Mr.

**First Name**

John

**Last Name**

Kozuh

**Title**

DPW Director

**Organization Name**

City of Lincoln Park

**Phone Type**

Business

**Number**

3133869000

**Extension**

**Email**

jkozuh@citylp.com

**Fax**

NONE PROVIDED

**Address**

1355 Southfield Road

Lincoln Park, MI 48146

US

### Section 2. MS4 Location Information

**Municipal Entity Name (e.g., City of Lansing)**

Lincoln Park MS4-Wayne

**Identify the Primary Municipal Facility or the Mailing Address Location**

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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**

42.2503515,-83.1792484

**Section 3. MS4 Contacts (1 of 2)**

---

**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**

Application Contact

**Contact**

**Prefix**

*Mr.*

**First Name**

John

**Last Name**

*Kozuh*

**Title**

*DPW Director*

**Organization Name**

*City of Lincoln Park*

**Phone Type**

Business

**Number**

3133861800

**Extension**

**Email**

*jkozuh@citylp.com*

**Fax**

NONE PROVIDED

**Address**

1355 Southfield Road

Lincoln Park, MI 48146

US

**Section 3. MS4 Contacts (2 of 2)**

---

**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**

Application Contact

## Contact

**Prefix**

Mr.

**First Name**

John

**Last Name**

Kozuh

**Title**

DPW Director

**Organization Name**

City of Lincoln Park

**Phone Type**

Business

**Number**

3133861800

**Extension****Email**

jkozuh@citylp.com

**Fax**

NONE PROVIDED

**Address**

1355 Southfield Road  
Lincoln Park, MI 48146  
US

## 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 that 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

[Lincoln Park Outfall Locations - Ecorse Creek.pdf - 01/03/2020 03:41 PM](#)

[Lincoln Park Outfall Locations - Sexton-Kilfoil Drain.pdf - 01/03/2020 03:42 PM](#)

**Comment**

Updated Ecorse Creek and Sexton Kilfoil Drain outfall location tables are attached as part of the permit application.

**CORRECTION REQUEST (APPROVED)**

**A map is not asked for here.**

You do not need to provide a map of the outfall locations here. These images are not required and can be removed.  
Created on 10/21/2019 3:58 PM by **Erica Volansky**

**CORRECTION REQUEST (APPROVED)**

**Provide an outfall/point of discharge table.**

Please put the 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. The outfall inspection forms do not contain any info about receiving waters or whether it is an outfall or point of discharge. Please see attached template. Fill it out with the required information and submit.

Created on 10/21/2019 1:55 PM by **Erica Volansky**

**CORRECTION REQUEST (APPROVED)**

**Has this information been updated?**

When this application was submitted in 2017, a comment was included here stating that a map and table was being developed. Has this been completed? Please provide for review.

Created on 8/29/2019 10:44 AM by **Erica Volansky**

**NOTE (CREATED)**

**APPROVED**

Created on 5/28/2020 4:26 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**

NONE PROVIDED

**First Name**

NONE PROVIDED

**Last Name**

NONE PROVIDED

**Title**

NONE PROVIDED

**Organization Name**

NONE PROVIDED

**Phone Type**

**Number**

**Extension**

NONE PROVIDED

**Email**

NONE PROVIDED

**Fax**

NONE PROVIDED

**Address**

[NO STREET ADDRESS SPECIFIED]

[NO CITY SPECIFIED], MI [NO ZIP CODE SPECIFIED]

USA

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

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### STORM WATER MANAGEMENT PROGRAM (SWMP)

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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)

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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

[ADW ERP - Lincoln Park.docx - 04/05/2017 03:35 PM](#)

[Chapter 603 - Municipal Civil Infractions - Lincoln Park Code of Ordinances.pdf - 09/19/2019 10:52 AM](#)

#### Comment

NONE PROVIDED

#### CORRECTION REQUEST (APPROVED)

**Please provide Chapter 603 ordinance for review.**

Chapter 603 is referenced in Section B of the ERP. Please provide the ordinance as an attachment to the ERP.

Created on 8/29/2019 11:06 AM by **Erica Volansky**

#### NOTE (CREATED)

**APPROVED**

Created on 10/18/2019 4:27 PM by **Erica Volansky**

### Public Participation/Involvement Program (PPP)

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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**

[ADW Public Participation Program - Lincoln Park.docx - 04/05/2017 03:38 PM](#)

**Comment**

NONE PROVIDED

NOTE (CREATED)

**APPROVED**

Created on 8/29/2019 11:10 AM 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.**

Refer to III. Procedures For Public Inspection, Comment And Participation In Implementation And Review on Page 2 of the above document.

**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):**

Refer to III. Procedures For Public Inspection, Comment And Participation In Implementation And Review on Page 2 of the above document.

**Section 6. Public Education Program**

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

Yes

**PEP Procedures**

[adw\\_stormwater\\_discharge\\_permit\\_app\\_pep\\_04192019\\_approved.pdf - 09/19/2019 10:55 AM](#)

**Comment**

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

**Upload approved ADW PEP**

The ADW's final PEP was approved in May 2019. This document needs to be uploaded before a permit can be issued. Please also make sure that any application references are updated, if necessary.

Created on 8/29/2019 11:18 AM by **Erica Volansky**

NOTE (CREATED)

**APPROVED**

Created on 10/18/2019 4:24 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).**

Refer to III. Procedure For Identifying And Prioritizing Applicable PEP Topics on Page 6 of the above attached document

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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13.

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to IV. Existing And Proposed Collaborative Public Education BMP'S on Pages 8 through 13

**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.**

Refer to VII. Evaluation Of Effectiveness as found on Page 15 of the attached document.

## **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 Elimination Program Procedures

[adw\\_collaborative\\_idep\\_approved.pdf - 09/19/2019 11:00 AM](#)  
[Title Four - Utilities - Lincoln Park Code of Ordinances.pdf - 09/19/2019 11:09 AM](#)  
[Aerial Outfalls 16-17 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 25-31 Ecorse Creek-1.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 12-15 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 1-12 Ecorse Creek-1.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 18-25 Ecorse Creek-1.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 60-61 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 39-44 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 48-52-1 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 45-47 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 53-56 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 32-38-1 Ecorse Creek-1.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 57-59-1 Ecorse Creek.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 1 Sexton Kilfoil Drain.jpg - 01/03/2020 10:44 AM](#)  
[Aerial Outfalls 5 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 4 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 2-3 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 8-10 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 6-7 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 18-23 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Aerial Outfalls 11-17 Sexton Kilfoil Drain.jpg - 01/03/2020 10:45 AM](#)  
[Lincoln Park Street Map.pdf - 01/03/2020 10:45 AM](#)

### Comment

NONE PROVIDED

### CORRECTION REQUEST (APPROVED)

#### Upload approved ADW IDEP

The ADW's final IDEP was approved in May 2019. This document needs to be uploaded before a permit can be issued. Please also make sure that any application references are updated, if necessary.  
Created on 8/29/2019 11:35 AM by **Erica Volansky**

### NOTE (CREATED)

#### APPROVED

Created on 10/18/2019 4:23 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)

The City of Lincoln Park overall storm sewer map is available for review at the City of Lincoln Park DPW. The City hired an outside firm to place the storm sewer system on an overall GIS. As of March 2020 this mapping has been completed.

**CORRECTION REQUEST (APPROVED)**

**When will this be complete?**

The City of Lincoln Park should have been awarded \$2 million in SAW grant funding. This money should be used to develop this map. An up-to-date map is required for permit issuance. Please provide the date that this map will be complete and provide for review.

Created on 10/21/2019 4:15 PM by **Erica Volansky**

**2 COMMENTS**

**Erica Volansky (VolanskyE@michigan.gov) (2/20/2020 4:12 PM)**

An up-to-date storm sewer system map(s) is required for permit issuance. Please inform EGLE when the map is updated and where it is stored when available.

**Mark Gaworecki (mfgaworecki@hengineers.com) (1/3/2020 10:43 AM)**

Currently, the City has plans from the sewer separation project from the 1980's which shows storm sewer locations. Also, the outfall maps for the Ecorse Creek and Sexton-Kilfoil are available. As for the SAW Grant money there was no money asked for storm sewer just for sanitary sewer work. The City of Lincoln Park has hired a firm to setup a GIS for the storm sewer and water main. The exact timetable of completion is not known.

**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.**

Refer to II. Priority Areas as found in the attached document on Page 3

**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.**

Refer to II. Priority Areas as found in the attached document on Page 3

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.**

Refer to III. Collaborative IDEP Activities as found on Pages 4 through 12. If advanced investigations are necessary Wayne County will take the lead.

**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.**

Refer to III. Collaborative IDEP Activities as found on Pages 4 through 12. If advanced investigations are necessary Wayne County will take the lead.

**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.**

Refer to III. Collaborative IDEP Activities as found on Pages 4 through 12. If advanced investigations are necessary Wayne County will take the lead.

**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.**

Refer to III. Collaborative IDEP Activities as found on Pages 4 through 12.

**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 .**

The City of Lincoln Park does not anticipate prioritizing any area in the City.

**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.)**

Refer to III. Collaborative IDEP Activities as found on Pages 4 through 12.

**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.**

N/A

**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.**

Refer to IV. Legal Authority as found on Page 12.

## **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.**

Refer to IDEP #4: Staff Training on Page 7 of the attached document.

**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.**

The effectiveness will be determined based on the Measures of Assessment as found for the IDEP's found on Pages 4 through 12 of the attached document.

#### **Illicit Discharge Ordinance or Other Regulatory Mechanism**

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**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).**

Refer to Title Four - Utilities - Chapter 1066 Illicit Connection Abatement

**CORRECTION REQUEST (APPROVED)**

**Please state which ordinance and provide.**

This reference is too vague. Please state which of the City ordinances apply to this question and which section of the ordinance. Also upload the ordinance referenced for review.

Created on 8/29/2019 11:39 AM by **Erica Volansky**

**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.**

Refer to Title Four - Utilities - Chapter 1066 Illicit Connection Abatement

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.**

Refer to Title Four - Utilities - Chapter 1066 Illicit Connection Abatement

**CORRECTION REQUEST (APPROVED)**

**Reference is too vague.**

Please state which of the City ordinances apply to this question and which section of the ordinance. Also upload the ordinance referenced for review.

Created on 8/29/2019 11:45 AM by **Erica Volansky**

**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.**

Refer to Title Four - Utilities - Chapter 1066 Illicit Connection Abatement

**CORRECTION REQUEST (APPROVED)**

**Reference is too vague.**

Please state which of the City ordinances apply to this question and which section of the ordinance. Also upload the ordinance referenced for review.

Created on 8/29/2019 11:46 AM by **Erica Volansky**

**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.**

Refer to Title Four - Utilities - Chapter 1066 Illicit Connection Abatement

**CORRECTION REQUEST (APPROVED)**

**Please provide ordinance for review.**

Upload Chapter 1040 ordinance as an attachment to the IDEP. EGLE staff will then review.

Created on 8/29/2019 11:47 AM by **Erica Volansky**

**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.**

Chapter 1040 - Utilities of the City of Lincoln Park Code of Ordinances

**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.**

Chapter 1040 - Utilities of the City of Lincoln Park Code of Ordinances

## **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

**Construction Storm Water Runoff Control**

**Construction Storm Water Runoff Control Program Procedure Attachment**

[ADW CSWRCP County - Part 91 - Lincoln Park.docx - 04/05/2017 05:39 PM](#)

**Comment**

NONE PROVIDED

NOTE (CREATED)  
APPROVED

Created on 10/18/2019 4:29 PM by Erica Volansky

**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.**

City of Lincoln Park Staff and/or Hennessey Engineers, Inc. will contact the County in the event of a complaint from the public and/or a discharge from a site. In addition refer to the SOP Construction Site Storm Water Runoff Control document Section B

CORRECTION REQUEST (APPROVED)

**Please add the consideration of complaints to notification procedure.**

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.

Created on 8/29/2019 11:56 AM by Erica Volansky

CORRECTION REQUEST (APPROVED)

**Reference is incorrect.**

When answering a question in the application please provide a reference to the document and section where the information can be found. An answer written here is not considered to be a part of the City's SWMP. This reference should read SOP Construction Site Stormwater Section B. Please correct.

Created on 8/29/2019 11:55 AM by Erica Volansky

**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.**

Per Section D of the SOP Construction Site Storm Water Runoff Control document the City of Lincoln Park shall notify EGLE through the Pollution Emergency Alert System (PEAS).

CORRECTION REQUEST (APPROVED)

**This question is asking for notification of EGLE (MDEQ)**

Please refer to Section D of the above document.

Created on 8/29/2019 11:57 AM by Erica Volansky

**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.**

Refer to the SOP Construction Site Storm Water Runoff Control document Section B

**CORRECTION REQUEST (APPROVED)**

**Reference is incorrect.**

When answering a question in the application please provide a reference to the document and section where the information can be found. An answer written here is not considered to be a part of the City's SWMP. This reference should read SOP Construction Site Stormwater Section B. Please correct.

Created on 8/29/2019 12:04 PM by **Erica Volansky**

**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).**

Refer to the SOP Construction Site Storm Water Runoff Control document Section E

**CORRECTION REQUEST (APPROVED)**

**Reference is incorrect.**

When answering a question in the application please provide a reference to the document and section where the information can be found. An answer written here is not considered to be a part of the City's SWMP. This reference should read SOP Construction Site Stormwater Section E. Please correct.

Created on 8/29/2019 12:28 PM by **Erica Volansky**

## **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**

ADW POSTCONSTRUCTION - Lincoln Park.DOCX - 04/06/2017 09:31 AM

**Comment**

NONE PROVIDED

**NOTE (CREATED)**

**APPROVED**

Created on 8/29/2019 12:40 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.**

Refer to Title Four - Utilities - Chapter 1045 County Storm Water Management

**CORRECTION REQUEST (APPROVED)**

**Does the City have their own ordinance or will they be adopting Wayne County?**

Most of the Post-Construction questions say that the City of Lincoln Park will be adopting Wayne County standards except for Q. 32 & 33. Please clarify.

Created on 8/29/2019 12:42 PM by **Erica Volansky**

**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 City of Lincoln Park defers all projects that disturb at least once acre of land to Wayne County for soil erosion control. As for parcels that are less than an acre

#### **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**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

**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**

N/A

**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)**

N/A

**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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

#### **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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

**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.**

NONE PROVIDED

**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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

### **Site-Specific Requirements**

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**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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

**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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

### **Off-Site Mitigation and Payment in Lieu Programs**

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**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 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 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.**

N/A

**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.**

N/A

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.

N/A

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.

N/A

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.

N/A

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.

N/A

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.

N/A

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.

N/A

51. Describe the tracking system implemented, or to be implemented, to track off-site mitigation and/or in-lieu projects.

N/A

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.

N/A

## Site Plan Review

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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.

As part of the overall review process the developer of land in the City must comply with current planning commission, city and engineering standards that include site plan and engineering plan checklists.

**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.**

As part of the overall review process the developer of land in the City must comply with current planning commission, city and engineering standards that include site plan and engineering plan checklists.

**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.**

Maintenance agreements between the City and the developer are required for any site that is developed

### **Long-Term Operation and Maintenance of BMPs**

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**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.**

Maintenance agreements between the City and the developer are required for any site that is developed

**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.**

Refer to the current Wayne County Storm Water Management Program that has been accepted by the City.

**58. Does the maintenance agreement or other legal mechanism allow the applicant to complete the following? (Check if yes)**

Inspect the structural or vegetative BMP

Perform the necessary maintenance or corrective actions neglected by the BMP owner or operator

**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 community does not track the transfer of operation and maintenance of a private BMP

**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 community does not track the transfer of operation and maintenance of a private BMP

## **Section 10. Pollution Prevention and Good Housekeeping Program**

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### **Pollution Prevention and Good Housekeeping Program Procedures**

[Lincoln Park Street Map.pdf - 01/03/2020 10:32 AM](#)

[City of Lincoln Park Overall Location Map.pdf - 01/03/2020 10:32 AM](#)

[ADW PPGH GENERA PROC - Lincoln Park 2019.docx - 01/03/2020 10:33 AM](#)

[Lincoln Park PIPP 5-2020.doc - 05/11/2020 11:22 AM](#)

#### **Comment**

The City of Lincoln Park's PIPP has been revised per the meeting with EGLE in early March 2020. Revisions have been reviewed and approved by DPW Director John Kozuh

**CORRECTION REQUEST (APPROVED)**

**Please upload site specific SOP for DPS facility.**

In Section E of the General SOP, it states that a PIPP was being developed for the DPS facility. A PIPP can be submitted so long as it satisfies all the requirements of the MS4 program. If the PIPP does not satisfy all the requirements, then a combo PIPP/SOP can be submitted. PERMIT ISSUANCE CAN NOT MOVE FORWARD UNTIL THIS SOP IS RECEIVED.

Created on 10/21/2019 4:18 PM by **Erica Volansky**

**3 COMMENTS**

**Erica Volansky (VolanskyE@michigan.gov) (5/6/2020 1:54 PM)**

Please edit the PIPP to include routine 1) a routine site inspection procedure/schedule, and 2) a comprehensive site inspection procedure/schedule. EGLE recommends that routine site inspections should be conducted bi-weekly and comprehensive inspections be conducted every 6 months.

**Erica Volansky (VolanskyE@michigan.gov) (2/20/2020 4:21 PM)**

The General Procedures document provided does not cover the 4 items listed in my comment below. Please either 1) edit the General Procedures document to include the items required on a site-specific SOP or, 2) provide an edited PIPP/SOP that includes the items required on a site-specific SOP.

**Erica Volansky (VolanskyE@michigan.gov) (2/6/2020 3:18 PM)**

A PIPP/SOP has not yet been submitted. Please submit for EGLE review. If the provided SOP is what is also intended to be the document that is kept on-site at the DPW facility, then it must include the information that is required for a high priority facility. Missing information includes: 1) a list of significant materials stored on site, their handling/storage procedures, and their potential to discharge to the MS4, 2) routine site inspection procedure/schedule, 3) comprehensive site inspection procedure/schedule, and 4) a person responsible for the oversight of the facility.

**CORRECTION REQUEST (APPROVED)**

**Please upload site specific SOP for DPS Facility.**

In Section E of the General SOP, it states that a PIPP was being developed for the DPS facility. A PIPP can be submitted so long as it satisfies all the requirements of the MS4 program. If the PIPP does not satisfy all the requirements, then a combo PIPP/SOP can be submitted.

Created on 8/29/2019 12:56 PM by **Erica Volansky**

**NOTE (CREATED)**

**APPROVED**

Created on 5/28/2020 4:21 PM by **Erica Volansky**

**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.**

Refer to Table 1 of the above mentioned document. Table 1 can be found on Page 3

**CORRECTION REQUEST (APPROVED)**

**Need to provide inventory of all structural controls.**

On Table 1 for the DPS yard the number of catch basins is (?). The City must provide the actual number of catch basins located at the DPS yard. Also, the inventory shall provide an estimate of the number of structural storm water controls throughout the ENTIRE MS4 for each applicable category.

Created on 10/21/2019 4:26 PM by **Erica Volansky**

**Facilities that may have the high potential to discharge pollutants:**

Materials storage and Public Works yards

**Check all applicant-owned or operated facilities with a discharge of storm water to surface waters of the state:**

Public parking lots

Parks

Other: Department of Public Services Facility

Administration buildings and libraries

Fire Stations

Police Stations

**CORRECTION REQUEST (APPROVED)**

**Missing facilities.**

Please edit this question to include ALL applicant-owned facilities. I have attached a picture of how to do this. If there are any other types of facilities that should be included, please do so.

Created on 10/18/2019 5:52 PM by **Erica Volansky**

**CORRECTION REQUEST (APPROVED)**

**Missing facilities.**

Table 1 in the General SOP lists more than just public parking lots. Please indicate the types of all applicant-owned or operated facilities with a discharge of storm water to surface waters of the State.

Created on 8/29/2019 12:58 PM by **Erica Volansky**

**Check all applicant-owned or operated structural storm water controls with a discharge of storm water to surface waters of the state:**

Catch basins

**CORRECTION REQUEST (APPROVED)**

**Missing structural storm water controls.**

Please edit this question to include ALL applicant-owned structural storm water controls. I have attached a picture of how to do this. If there are any more types that need to be included, please do so.

Created on 10/18/2019 5:54 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)**

Lincoln Park Owned Facilities Map 2019 is now attached as part of this application. The City of Lincoln Park has NO detention basins located within the City. There is a retention basin that is located at the RTB which is used to wash out the RTB when needed.

**CORRECTION REQUEST (APPROVED)**

**This map is not sufficient.**

The provided map only shows parks, schools (which are not nested under the City so does not need to be provided) and the DPS yard. Please provide a map that includes the location of the City Hall, Fire Dept., Police Dept., 25th District Court, Community Center, and the Museum.

Created on 10/21/2019 2:13 PM by **Erica Volansky**

**1 COMMENT**

**Mark Gaworecki (mfgaworecki@hengineers.com) (1/3/2020 10:36 AM)**

The City of Lincoln Park map showing locations of the requested sites including City Hall, Police, Fire, Court, Community Center and Museum is attached. Also, this map shows schools which are part of the overall City map available to the residents. The schools will remain on the map.

**CORRECTION REQUEST (APPROVED)**

**Is this map complete? Please update General SOP.**

In Section D of the General SOP, the last sentence is incomplete. It is a statement describing where the up-to-date map can be found of the City's facilities. Please correct this sentence. Also, at the time of this submission, this map was still being developed. Has it been completed?

Created on 8/29/2019 2:58 PM by **Erica Volansky**

**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.**

If any control maybe added or deleted by the City of Lincoln Park the updated map will be revised to reflect any and all additions and/or deletions.

### **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.**

Based on the factors listed above the DPW facility is considered a high priority site. The City is in the process of preparing a PIPP for the City of Lincoln Park DPW Facility. Once completed it will be forwarded to the MDEQ

**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.**

Refer to Section E - Site Specific SOP For High Priority Sites on Page 4 of the above attached document

**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.**

NONE PROVIDED

**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)**

Refer to Section E - Site Specific SOP For High Priority Sites on Page 4 of the above attached document

**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)**

Refer to Section E - Site Specific SOP For High Priority Sites on Page 4 of the above attached document. The City is in the process of preparing a PIPP for the City of Lincoln Park DPW Facility. Once completed it will be forwarded to the MDEQ

**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)**

The City is in the process of preparing a PIPP for the City of Lincoln Park DPW Facility. Once completed it will be forwarded to the MDEQ

**CORRECTION REQUEST (APPROVED)**

**Provide routine inspection procedure/schedule in DPS PIPP.**

Edit the PIPP to include the following language: "Preventive maintenance involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. A routine inspection is conducted by facility staff during site walkthroughs every two weeks. 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."

Created on 5/6/2020 4:29 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)**

The City is in the process of preparing a PIPP for the City of Lincoln Park DPW Facility. Once completed it will be forwarded to the MDEQ

**CORRECTION REQUEST (APPROVED)**

**Provide comprehensive inspection procedure/schedule in DPS PIPP.**

Edit the PIPP to include the following language: "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 DPS related activities will be evaluated during the comprehensive inspection. The comprehensive site inspection for DPS areas will be conducted every (six) 6 months. Documentation of the comprehensive site inspection results will be prepared and kept on file."

Created on 5/6/2020 4:31 PM by **Erica Volansky**

**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.**

The City is in the process of preparing a PIPP for the City of Lincoln Park DPW Facility. Once completed it will be forwarded to the MDEQ

### **Structural Storm Water Control Operation and Maintenance Activities**

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**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.**

Catch basins are not prioritized in the city. During a normal day the DPS crews may encounter a catch basin that has failed and or is draining poorly. If that is the case, then the basin will be placed on a list or cleaned. Refer to Section F of General SOP.

**CORRECTION REQUEST (APPROVED)**

**Inspection/cleaning schedule does not meet permit requirements.**

Catch basins should not be left un-maintained until the point of clogging. All city-owned and operated catch basins should be inspected at least once every 3 years. If a catch basin is found to be 50% full, it should be cleaned out. Also, a specific schedule for inspections should be developed. Please revise the General SOP to state this.

Created on 8/29/2019 3:13 PM by **Erica Volansky**

**1 COMMENT**

**Erica Volansky (VolanskyE@michigan.gov) (10/21/2019 4:27 PM)**

Please put in the General SOP the following. "All city-owned and operated catch basins will be inspected at least once every 3 years. If a catch basin is found to be 50% full, it will be cleaned out."

**CORRECTION REQUEST (APPROVED)**

**Reference incorrect.**

Please refer to Section F in General SOP.

Created on 8/29/2019 3:07 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.**

Catch basins are not prioritized in the city. They are inspected during routine maintenance and if one is found in need of repair or cleaned a list is compiled by the DPS Director. There are no maps produced with the locations. A street map is provided as an attachment.

**CORRECTION REQUEST (APPROVED)**

**This is missing.**

Provide the reference to the narrative description or map submitted above with the geographic location of the catch basins in each priority level.

Created on 8/29/2019 3:08 PM by **Erica Volansky**

**2 COMMENTS**

**Mark Gaworecki (mfgaworecki@hengineers.com) (1/3/2020 10:30 AM)**

Catch basins are located in each and every street throughout the City. These basins are located at low points in the road network. Information has been added to Table 1 of the SOP.

**Erica Volansky (VolanskyE@michigan.gov) (10/18/2019 5:56 PM)**

I understand the City is not prioritizing. The City still needs to provide a map or a narrative description of the location of its catch basins. This could be listed on Table 1 of the General Procedures SOP (for example: Streets and publicly owned parking lots, Catch basins (300)).

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.**

Refer to Section F - Catch Basin Maintenance Priority on Page 4 of the above document.

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.**

Refer to Section H - Disposal of Collected Material



CORRECTION REQUEST (APPROVED)

**Incorrect reference.**

Please refer to Section H of General SOP.  
Created on 8/29/2019 3:10 PM by **Erica Volansky**

**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.**

Refer to Section J - Other Structural Storm Water Controls. At the present time the only detention basin facility that is owned by the City of Lincoln Park is located at their RTB. The basin is a retention basin used to clean the cells of the facility.

CORRECTION REQUEST (APPROVED)

**This reference does not answer the question.**

I think Section J of the General SOP answers this question but it refers to a detention basin that isn't listed as a structural control in Q. 60. Please review what structural controls the City owns and maintains and correct the SOP.  
Created on 8/29/2019 3:27 PM 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.**

Refer to Section K - New Applicant Owned Facilities of the General SOP

CORRECTION REQUEST (APPROVED)

**Reference incorrect.**

Please refer to Section K of the General SOP.  
Created on 8/29/2019 3:04 PM by **Erica Volansky**

## **Municipal Operations and Maintenance Activities**

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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):**

Right-of-way maintenance

Vehicle washing and maintenance of applicant-owned vehicles (e.g., police, fire, school bus, public works)

Cold weather operations (e.g., plowing, sanding, application of deicing agents, and snow pile disposal)

**CORRECTION REQUEST (APPROVED)**

**Cold weather operations? Vehicle washing?**

Table 1 in the General SOP state that the DPS facility has salt storage which implies that the City applies salt in the winter time. Also, Table 1 states that the Lincoln Park Fire Department conducts vehicle washing. Please develop procedures for both of these activities and provide in an SOP.

Created on 8/29/2019 3:32 PM by **Erica Volansky**

**2 COMMENTS**

**Mark Gaworecki (mfgaworecki@hengineers.com) (11/4/2019 10:25 AM)**

Information has been added to the Lincoln Park SOP. It should be noted that the Fire Department and DPS wash all vehicles within their buildings. As for the Police Department all vehicles are washed at a local car wash.

**Erica Volansky (VolanskyE@michigan.gov) (10/18/2019 5:58 PM)**

Please develop procedures for both cold weather operations and vehicle washing/maintenance and include them in the SOP under Section J. Examples are provided in a separate Note.

**NOTE (CREATED)**

**PROCEDURE EXAMPLES**

Created on 10/21/2019 4:55 PM by **Erica Volansky**

**Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.**

Refer to Section F - Catch Basin Maintenance Priority and Section G - Catch Basin Inspection, Maintenance And Cleaning as found on Page 4 and 5 of the above document.

**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.**

Refer to Section I - Street Sweeping Prioritization of the General SOP

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Please refer to Section I of General SOP.

Created on 8/29/2019 3:42 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.**

There are no priority levels established for streets, parking lots and other impervious areas. As part of the application a City of Lincoln Park street map is included.

**CORRECTION REQUEST (APPROVED)**

**Please provide a narrative description or map.**

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. This map can be any of the other maps need for the permit application so long as they show the locations of city-owned streets.

Created on 8/29/2019 3:43 PM by **Erica Volansky**

**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.**

Refer to Section I - Street Sweeping Prioritization as found on Page 5

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.**

Refer to Section H - Disposal Of Collected Material section of the General SOP

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Please refer to Section H of the General SOP.

Created on 8/29/2019 3:45 PM by **Erica Volansky**

## **Managing Vegetated Properties**

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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.**

Refer to Section L - Certified Pesticide Applicator section of the General SOP

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Please refer to Section L of the General SOP.

Created on 8/29/2019 3:29 PM by **Erica Volansky**

## **Contractor Requirements and Oversight**

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**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.**

Refer to Section N - Contract Requirements And Oversight found on Page 9 of the above document

## **Employee Training**

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**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.**

Refer to Section M - Employee Training on Page 8 of the above document

## **Section 11. Total Maximum Daily Load Implementation Plan**

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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

ADW TMDL MS4 Task List-FINAL - Lincoln Park.xlsx - 04/06/2017 03:47 PM

[adw\\_tmdl\\_plan\\_2019\\_final.pdf](#) - 09/19/2019 02:05 PM

#### Comment

NONE PROVIDED

**CORRECTION REQUEST (APPROVED)**

**Please upload approved ADW TMDL.**

The ADW TMDL plan was revised and re-approved in August 2019. Please upload this plan.  
Created on 8/29/2019 3:48 PM by **Erica Volansky**

**Proposing to work collaboratively on any or all activities in the TMDL Implementation Plan during the permit cycle.**  
NONE PROVIDED

**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.**

Excessive bacteria (E. coli), and sediment in the Ecorse Riveer

**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.**

Refer to II. Prioritizing And Implementation BMP's on Page 2 of the attached document.

**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.**

Refer to III. Monitoring Plan on Page 2 and 3 of the attached document.

**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.**

Refer to III. Monitoring Plan on Page 2 and 3 of the attached document.

## **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.**

N/A

**90. Provide the reference to the inventory of industrial facilities submitted above using the procedure in Question No. 89.**

N.A

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.**

N/A

**92. Provide the reference to the list of the prioritized industrial facilities for inspection submitted above.**

N/A

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.**

N/A

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.**

N/A

## **Section 13. Certify and Submit**

### **Comments (As needed)**

MS4 Application Prepared For By Hennessey Engineers, Inc. On Behalf Of The City Of Lincoln Park

### **Additional Documents (As needed)**

NONE PROVIDED

**Comment**

NONE PROVIDED

## Attachments

Date	Attachment Name	Context	User
5/11/2020 11:22 AM	Lincoln Park PIPP 5-2020.doc	Attachment	Mark Gaworecki
1/3/2020 3:42 PM	Lincoln Park Outfall Locations - Sexton-Kilfoil Drain.pdf	Attachment	Mark Gaworecki
1/3/2020 3:41 PM	Lincoln Park Outfall Locations - Ecorse Creek.pdf	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Lincoln Park Street Map.pdf	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 8-10 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 6-7 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 18-23 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 11-17 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 5 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 4 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:45 AM	Aerial Outfalls 2-3 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 1 Sexton Kilfoil Drain.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 60-61 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 39-44 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 48-52-1 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 45-47 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 53-56 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 32-38-1 Ecorse Creek-1.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 57-59-1 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 16-17 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 25-31 Ecorse Creek-1.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 12-15 Ecorse Creek.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 1-12 Ecorse Creek-1.jpg	Attachment	Mark Gaworecki
1/3/2020 10:44 AM	Aerial Outfalls 18-25 Ecorse Creek-1.jpg	Attachment	Mark Gaworecki
1/3/2020 10:33 AM	ADW PPGH GENERA PROC - Lincoln Park 2019.docx	Attachment	Mark Gaworecki

Date	Attachment Name	Context	User
1/3/2020 10:32 AM	City of Lincoln Park Overall Location Map.pdf	Attachment	Mark Gaworecki
1/3/2020 10:32 AM	Lincoln Park Street Map.pdf	Attachment	Mark Gaworecki
10/21/2019 4:55 PM	Winter Operations Procedure.pdf	Note	Erica Volansky
10/21/2019 4:55 PM	Vehicle Maintenance Procedure.pdf	Note	Erica Volansky
10/18/2019 5:54 PM	applicant owned structures question.JPG	Correction Request	Erica Volansky
10/18/2019 5:52 PM	applicant owned facilities question.JPG	Correction Request	Erica Volansky
9/19/2019 2:05 PM	adw_tmdl_plan_2019_final.pdf	Attachment	Mark Gaworecki
9/19/2019 11:09 AM	Title Four - Utilities - Lincoln Park Code of Ordinances.pdf	Attachment	Mark Gaworecki
9/19/2019 11:00 AM	adw_collaborative_iddep_approved.pdf	Attachment	Mark Gaworecki
9/19/2019 10:55 AM	adw_stormwater_discharge_permit_app_pep_04192019_approved.pdf	Attachment	Mark Gaworecki
9/19/2019 10:52 AM	Chapter 603 - Municipal Civil Infractions - Lincoln Park Code of Ordinances.pdf	Attachment	Mark Gaworecki
4/6/2017 3:47 PM	ADW TMDL MS4 Task List-FINAL - Lincoln Park.xlsx	Attachment	Mark Gaworecki
4/6/2017 9:31 AM	ADW POSTCONSTRUCTION - Lincoln Park.DOCX	Attachment	Mark Gaworecki
4/5/2017 5:39 PM	ADW CSWRCP County - Part 91 - Lincoln Park.docx	Attachment	Mark Gaworecki
4/5/2017 3:38 PM	ADW Public Participation Program - Lincoln Park.docx	Attachment	Mark Gaworecki
4/5/2017 3:35 PM	ADW ERP - Lincoln Park.docx	Attachment	Mark Gaworecki

## Status History

	User	Processing Status
5/11/2020 11:17:28 AM	Mark Gaworecki	Draft
5/11/2020 11:27:22 AM	Mark Gaworecki	Submitted
6/29/2021 2:48:35 PM	Kathryn Gallagher	Complete

## Audit

Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Volansky	8/29/2019 10:44 AM
Submission Unlocked	Submission Unlocked	Erica Volansky	8/29/2019 4:10 PM
Submission Locked	Submission Locked	Erica Volansky	10/18/2019 4:51 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	10/21/2019 4:55 PM

## Revisions

<b>Revision</b>	<b>Revision Date</b>	<b>Revision By</b>
Revision 1	3/28/2017 1:50 PM	Mark Gaworecki
Revision 2	9/19/2019 10:44 AM	Mark Gaworecki
Revision 3	11/4/2019 9:53 AM	Mark Gaworecki
Revision 4	4/16/2020 9:32 AM	Mark Gaworecki
Revision 5	5/11/2020 11:17 AM	Mark Gaworecki