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

version 1.8

(Submission #: 2PW-MBN8-K2P3, version 5)

Details

Submission ID 2PW-MBN8-K2P3

Submission Reason Renewal

Status Complete

Form Input

Existing Permit Details

Existing Permit ID (Read Only)

6659833965751995494

Existing Permit Number (Read Only)

MIG610017

Section 1. Applicant Information

Applicant Information

Prefix

NONE PROVIDED

First Name

NONE PROVIDED

Last Name

NONE PROVIDED

Title

NONE PROVIDED

Organization Name

City of Romulus

Phone Type

Business

Number

7349427569

Extension

Email

NONE PROVIDED

Fax

NONE PROVIDED

Address

11111 Wayne Road

Romulus, MI 48174

US

Section 2. MS4 Location Information

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

Romulus MS4-Wayne

Identify the Primary Municipal Facility or the Mailing Address Location

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

Facility Location

42.22270130334307,-83.38453933596611

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

NONE PROVIDED

First Name

Kathy

Last Name

Hood

Title

NONE PROVIDED

Organization Name

City of Romulus

Phone Type

Main

Number

7349427579

Extension

Email

khood@romulusgov.com

Fax

NONE PROVIDED

Address

11111 Wayne Road

Romulus, MI 48174

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

Storm Water Billing Contact

Storm Water Program Manager

Contact

Prefix

NONE PROVIDED

First Name

Roberto

Last Name

Scappaticci

Title

DPW Director

Organization Name

City of Romulus

Phone Type

Main

Number

734-942-7579

Extension**Email**

rscappaticci@ci.romulus.mi.us

Fax

NONE PROVIDED

Address

12600 Wayne Road

Romulus, MI 48174

USA

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

Regulated Area

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

[Urbanized Area Link](#)

Select an Urbanized Area

Detroit

Outfall and Point of Discharge Information

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

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

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

Please note 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

[Outfalls_DischargePts.xlsx - 09/19/2019 01:51 PM](#)

[Outfalls_Facilities.pdf - 10/30/2019 12:58 PM](#)

Comment

Downloaded spreadsheet identifying requested information. Removed the map as it is still being updated to reflect spreadsheet.

CORRECTION REQUEST (APPROVED)

Upload outfall and facility map.

Please upload the outfall and facility map when it is finished being updated.
Created on 10/15/2019 10:11 AM by **Erica Volansky**

CORRECTION REQUEST (APPROVED)

Outfall map is missing some information.

Each discharge point needs to be categorized as either an outfall or a point of discharge. The definition of each is listed above. Please clarify. Also the receiving water for each discharge point needs to be listed.

Created on 8/26/2019 12:06 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (9/12/2019 10:40 AM)

I am waiting for this to be revised by our GIS coordinator.

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

Bill

Last Name

Garland

Title

NONE PROVIDED

Organization Name

Romulus Community Schools

Phone Type

NONE PROVIDED

Number

NONE PROVIDED

Extension

Email

NONE PROVIDED

Fax

NONE PROVIDED

Address

36540 Grant Road

Romulus, MI 48174

US

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

STORM WATER MANAGEMENT PROGRAM (SWMP)

This Application requires a description of the Best Management Practices (BMPs) the applicant will implement for each minimum control measure and the applicable water quality requirements during this permit cycle. The applicant shall incorporate

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

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

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

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

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

[USEPA measurable goals guidance document link](#)

Enforcement Response Procedure (ERP)

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

ERP

[ADW_ERP_TEMPLATE.docx - 10/25/2019 09:22 AM](#)

Comment

Added time frame language Section B

CORRECTION REQUEST (APPROVED)

ERP and ordinance do not match.

The ERP was edited to include an acceptable enforcement schedule but the ordinance it references does not match it. Please have the ERP match the DRAFT ordinance provided.

Created on 10/16/2019 10:04 AM by **Erica Volansky**

CORRECTION REQUEST (APPROVED)

What is the City's expected response to violations?

The ERP shall include the applicant's expected response to violations to compel compliance with an ordinance or regulatory mechanism implemented by the applicant in the SWMP (e.g., written notices, citations, fines). Will the City use a tiered approach, first offense, 2nd attempt and/or 3rd attempt? Provide established timelines to return to compliance.

Created on 8/26/2019 1:05 PM by **Erica Volansky**

1 COMMENT

Erica Volansky (VolanskyE@michigan.gov) (10/16/2019 11:37 AM)

Please include the enforcement response procedure that is listed in the draft ordinance.

CORRECTION REQUEST (APPROVED)

The ERP needs to have more specific timeframes.

Please clarify the timeframe for notifying the responsible party of violations. The recommended timeframe for notifying violators of violations is within 1-2 business days and it is recommended that violations are corrected within 30 days. Please confirm that the ERP is applicable to all components of the Storm Water Management Plan (SWMP).

Created on 8/26/2019 1:03 PM by **Erica Volansky**

Public Participation/Involvement Program (PPP)

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

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

Yes

PPP Procedures

[ADW Public Participation Program.docx - 03/20/2017 10:16 AM](#)

Comment

NONE PROVIDED

NOTE (CREATED)

APPROVED

Created on 8/26/2019 1:19 PM by **Erica Volansky**

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

Attachment - Page 3 BMP 1.2 Public Access to SWMP's

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):

Attachment - Page 3 BMP 1.3 SWMP Implementation and BMP 1.4 SWMP Review

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 - 09/09/2019 01:48 PM](#)

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

Upload approved ADW PEP.

The ADW's PEP document was approved in May 2019. Please upload the final approved document. Be sure to update any appropriate references in applicable questions.

Created on 8/26/2019 1:22 PM by **Erica Volansky**

NOTE (CREATED)
APPROVED

Created on 10/16/2019 9:09 AM 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).

Attachment - Collaborative PEP - Pages 6 III. Procedure for Identifying and Prioritizing Pep Topics

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

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

An example PEP table is available at the link below.

[PEP table example link](#)

A. Promote public responsibility and stewardship in the applicant's watershed(s). Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

Attachment - Collaborative PEP - Page 8 thru 13 - Activities 1 thru 10

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.

Attachment - Collaborative PEP - Pages 10 - 12 - Activities #4, 5 and 8

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.

Attachment - Collaborative PEP - Page 12 - Activity #8

D. Promote preferred cleaning materials and procedures for car, pavement, and power washing. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

Attachment - Collaborative PEP - Page14 - Activity #11

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.

Attachment - Collaborative PEP - Page14 - Activity #11

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.

Attachment - Collaborative PEP - Page14 - Activity #11

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.

Attachment - Collaborative PEP - Page 14 - Activity #10

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.

not applicable - septic handled by Wayne County

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.

Attachment - Collaborative PEP - Pages 8 - 10 Activities 1 thru 4

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.

Attachment - Collaborative PEP - Pages 8 and 9 - Activity #2

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.

Attachment - Collaborative PEP - Page 16 - VII. Evaluation of effectiveness

Section 7. Illicit Discharge Elimination Program

[>>Click here to access the MDEQ IDEP Compliance Assistance Document](#)

[>>Click here to access the Center for Watershed Protection guide](#)

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

Yes

Illicit Discharge Elimination Program Procedures

[Romulus Ordinance.pdf - 03/27/2017 10:50 AM](#)

[adw_collaborative_idep_approved.pdf - 09/09/2019 01:20 PM](#)

[DRAFT -Ordinance to Add Illicit Discharge & Connection Stormwater Control. Ver 9-17-19.docx - 09/19/2019 11:14 AM](#)

Comment

Study Session for draft Ordinance is scheduled with City Council on 11/4/19. First reading of the Draft Ordinance will take place on 11/12/19. Second Reading and Final adoption of Draft Ordinance will take place on 11/25/19.

CORRECTION REQUEST (APPROVED)

DRAFT Illicit Discharge ordinance meets permit requirements.

The ordinance must be approved by the City and in effect before a permit can be issued.

Created on 10/16/2019 11:20 AM by **Erica Volansky**

CORRECTION REQUEST (APPROVED)

Upload approved ADW IDEP.

The ADW's IDEP document was approved in May 2019. Please upload the final approved document. Be sure to update any appropriate references in applicable questions.

Created on 8/26/2019 1:25 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (9/9/2019 1:29 PM)

I am meeting with City Attorney regarding language referenced for Question 20. Romulus Ordinance Language will need to be changed.

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)

City of Romulus Department of Public Works. Inspections and Utilities Office Flat Files.

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.

Attachment ADW IDEP FINAL - Page 3 - SECTION II PRIORITIES - PRIORITY IDEP WORK AREAS

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

Attachment ADW IDEP FINAL - Page 4 - Figure 1 IDEP Priority Work Areas and Monitoring Sites

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.

Attachment ADW IDEP FINAL - Pages 12 - IDEP #7 Point of Storm Water Discharge - Dry Weather Screening. Schedule language included.

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.

Attachment - Page 10 - IDEP #6 Visual Inspection during Routine Field Operations

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.

Attachment - Page 10 - IDEP #6 Visual Inspection during Routine Field Operations

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.

Attachment - Page 6 - IDEP #2 Environmental Hotline and Coordinated Complaint Response

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.

Attachment - Page 10 - IDEP #6 Visual Inspection during Routine Field Operations

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.)

Attachment - Page 5 and 6 - IDEP #2 Environmental Hotline and Coordinated Complaint Response

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.

NONE PROVIDED

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.

Attachment - Page 5 and 6 - IDEP #2 Environmental Hotline and Coordinated Complaint Response

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.

Attachment - ADW IDEP FINAL - Page 8 IDEP #4 Staff Training

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

Attachment - ADW IDEP FINAL - Pages 14 - IDEP #10 Method to Evaluate IDEP Effectiveness

Illicit Discharge Ordinance or Other Regulatory Mechanism

20. Provide the reference to the in effect ordinance or regulatory mechanism submitted above that prohibits non-storm water discharges into the applicant's MS4 (except the non-storm water discharges addressed in Questions 21 and 22).

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control

Sec. 62-121 Purpose (2)

CORRECTION REQUEST (APPROVED)

Ordinance does not meet permit requirements.

All non-storm water discharges must be prohibited from entering the City's MS4. No treated non-stormwater discharges should be allowed to enter the MS4. Also this section only states that it is unlawful to discharge into any natural outlet within the City. This would not cover manmade conveyances.

Created on 8/26/2019 1:51 PM 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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
Sec. 62-125 (b) Exempt discharges.

CORRECTION REQUEST (APPROVED)

Does the City intend to exclude firefighting discharges?

If so, this must be stated within an ordinance or regulatory mechanism. Please clarify.

Created on 8/26/2019 1:55 PM by **Erica Volansky**

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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
Sec. 62-125 (b) Exempt discharges.

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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
62-121 Purpose - (1)

CORRECTION REQUEST (APPROVED)

Ordinance does not answer questions 23-26

The ordinance provided does not meet permit requirements. Please provide an ordinance or regulatory mechanism that answers questions 23 through 26.

Created on 8/26/2019 5:10 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (9/9/2019 1:54 PM)

Meeting with city attorney on 9/11/19 to discuss updating Romulus' Ordinance for Illicit Discharges

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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
62-121 (2)

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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
62-121 (3)

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.

DRAFT City of Romulus Ordinance - Illicit Discharge and Connection Stormwater Control
ENFORCEMENT
Sec. 62-132 Notice of violation

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

Authorized Public Agency

No the applicant relies on the following Qualifying Local Soil Erosion and Sedimentation Control Program (Part 91 Agency)

Wayne County Land Resource Management Division

Construction Storm Water Runoff Control

Construction Storm Water Runoff Control Program Procedure Attachment

[ADW_CSWRCP_TEMPLATE-County-Part91 \(002\) \(1\).docx - 09/09/2019 01:57 PM](#)

Comment

NONE PROVIDED

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.

Attachment - Page 2 - Section B Notification Procedure - 1st Paragraph

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.

Attachment - Page 3 - Section D - Reportable Discharges

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.

Attachment - Page 2 - Section B Notification Procedure - 2nd Paragraph

CORRECTION REQUEST (APPROVED)

Include construction activity within 500 feet of waterbody.

Please include in this paragraph that any construction activity one acre or greater or located within 500 feet of the water's edge of a lake or stream must obtain a Part 91 permit. See attached rule requiring this.

Created on 8/26/2019 5:37 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (9/9/2019 1:58 PM)

Edited document and uploaded revised copy

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).

Attachment - Page 3 - Section E - State of Michigan Permit by Rule

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_TEMPLATE.docx - 03/21/2017 02:22 PM

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

APPROVED

Created on 8/26/2019 5:39 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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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)

NONE PROVIDED

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

Site-Specific Requirements

41. Provide the reference to the procedure submitted above for reviewing the use of infiltration BMPs to meet the water quality treatment and channel protection standards for new development or redevelopment projects in areas of soil or groundwater contamination in a manner that does not exacerbate existing conditions. The procedure shall include the process for coordinating with MDEQ staff as appropriate.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

Off-Site Mitigation and Payment in Lieu Programs

43. An applicant may choose to allow for the approval of off-site mitigation for redevelopment projects that cannot meet 100 percent of the performance standards on-site after maximizing storm water retention. Off-site mitigation refers to BMPs implemented at another location within the same jurisdiction and watershed/sewershed as the original project. A watershed is the geographic area included in 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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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

NONE PROVIDED

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.

NONE PROVIDED

Site Plan Review

53. Provide the reference to the ordinance or regulatory mechanism submitted above that includes a requirement to submit a site plan for review and approval of post-construction storm water runoff BMPs. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

Long-Term Operation and Maintenance of BMPs

56. Provide the reference to the ordinance or regulatory mechanism submitted above that requires the long-term operation and maintenance of all structural and vegetative BMPs installed and implemented to meet the performance standards in perpetuity. If not available at this time, provide the date the procedure will be available.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

58. Does the maintenance agreement or other legal mechanism allow the applicant to complete the following?

(Check if yes)

NONE PROVIDED

If any of the boxes above were not checked, provide a response explaining how the maintenance agreement or other legal mechanism allows the applicant to verify and ensure maintenance of the BMP.

NONE PROVIDED

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.

Attachment POST CONSTRUCTION - SECTION B - Adoption of County Standards

Section 10. Pollution Prevention and Good Housekeeping Program

Pollution Prevention and Good Housekeeping Program Procedures

[CITY MAP.PDF - 03/24/2017 01:16 PM](#)

[Addendum.pdf - 03/24/2017 03:08 PM](#)

[SOP.DOCX - 01/03/2020 09:38 AM](#)

[PIPP-romulus.doc - 02/07/2020 03:17 PM](#)

Comment

Updated SOP for correction requests

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.

Attachment SOP - Page 4 - Table 1 City of Romulus Operated Properties

Facilities that may have the high potential to discharge pollutants:

Materials storage and Public Works yards

Salt storage facilities

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

Administration buildings and libraries

Animal Control Building

Fire Stations

Parks

Public parking lots

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

Catch basins

Detention basins

Vegetated swales

Pump Stations

Rain gardens

Oil/water separators

CORRECTION REQUEST (APPROVED)

Structural control locations missing.

Some of the listed structural stormwater controls are not listed in Section D Table 1. Please indicate in the table or in a narrative, where these structural controls are.

Created on 8/27/2019 1:52 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)

DPW Offices

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.

Attachment SOP - Page 3 - Section C - Updates and Priority Revision

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.

Attachment SOP - Page 3 Section B - Facility Assessment and Prioritization

Attachment PIPP - Page 7 and 8 - Chapter 4

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.

Attachment SOP - Page 4 - Table 1 City of Romulus Operated Properties

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

Yes, a site-specific SOP is available at each facility with the high potential for pollutant runoff

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

Attachment - SOP - Page 5 Section E - Site Specific SOP for High Priority Sites - E.1

Attachment - PIPP - Page 7 and 8 - Chapter 4 and Chapter 5

CORRECTION REQUEST (APPROVED)

List of significant materials is missing information.

All listed significant materials are required to be evaluated for their potential to discharge. The PIPP concentrates on salt but for the MS4 permit, all of the materials need to be evaluated. Please correct.

Created on 8/27/2019 1:09 PM by **Erica Volansky**

4 COMMENTS

Erica Volansky (VolanskyE@michigan.gov) (2/5/2020 3:45 PM)

Please add a column to the PIPP table the potential to discharge (low, medium, or high) to the MS4 for each listed material. This is a requirement for the MS4 permit.

Kathryn Ritter (khood@romulusgov.com) (1/3/2020 10:19 AM)

Complete.....

Erica Volansky (VolanskyE@michigan.gov) (12/30/2019 12:27 PM)

For each significant material please include: 1) a description of the handling and storage requirements and, 2) the potential to discharge to the City's MS4.

Erica Volansky (VolanskyE@michigan.gov) (10/16/2019 11:41 AM)

SOP Pg. 5 Section E states that the DPW facility has 7 stockpiles and 2 dumpsters. These must be listed out as significant materials and evaluated for their potential to discharge to the City's MS4. This is not included in the PIPP. Please edit the PIPP or provide a separate document that includes the information required for the MS4 permit.

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)

Attachment PIPP - Page 8 Chapter 5 Routine Inspections

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)

Attachment PIPP Addendum - Page 11 - Routine Maintenance

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)

Attachment PIPP Addendum - Page 11 - Comprehensive Inspections

Attachment SOP Page 6 Section E High Priority Sites and Page 10 Section M Employee Training

CORRECTION REQUEST (APPROVED)

Need to include non-structural controls.

The comprehensive inspection shall include an inspection of all structural storm water controls and a review of non-structural storm water controls, i.e., employee training records, routine inspection reports, etc. Please correct.

Created on 8/27/2019 1:25 PM by **Erica Volansky**

2 COMMENTS

Kathryn Ritter (khood@romulusgov.com) (1/3/2020 10:20 AM)

Edited

Erica Volansky (VolanskyE@michigan.gov) (10/16/2019 11:48 AM)

The comprehensive inspection needs to include a review of all structural stormwater controls AND the non-structural controls (the routine inspection paperwork). Please state this.

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.

Attachment - SOP - Page 4 - Section D Table 1
Attachment - PIPP Pages 10 and 11

CORRECTION REQUEST (APPROVED)

Incorrect reference.

This question is asking for the BMPs being implemented at the medium to low priority facilities. Section D Table 1 lists them. Please correct this reference.

Created on 8/27/2019 1:17 PM by **Erica Volansky**

Structural Storm Water Control Operation and Maintenance Activities

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

Attachment SOP - Pages 6 and 7 - Section F Catch Basin Maintenance Priority
1st paragraph and priority points

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

Attachment SOP - Page 5 Section F - 2nd Paragraph

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.

Attachment SOP Page 7 - Section G -

CORRECTION REQUEST (APPROVED)

Cleaning criteria?

When will staff clean out catch basins? Every time they inspect or when they are full? EGLE recommends that the City cleans out a catch basin when it is observed to be 50% full. Please clarify what the City's cleaning procedure is.

Created on 8/27/2019 1:49 PM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

Attachment SOP Page 7 - Section H

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

Attachment SOP - Page 8 and 9 - SECTION J

CORRECTION REQUEST (APPROVED)

Missing some structural controls procedures.

In Question 60, the City lists infiltration basins and trenches, oil/water separators, porous pavement, and vegetated swales as structural stormwater controls. It is required to develop a procedure for inspecting and maintaining these controls.

Please review what structural controls the City has and correct.

Created on 8/27/2019 2:04 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.

Attachment SOP Page 9 - Section K

Municipal Operations and Maintenance Activities

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

At a minimum, the procedure shall include assessing the following municipal operation and maintenance activities if applicable (check all that apply):

Road, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)

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

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

SOP Attachment page 11 Sections P and Q

CORRECTION REQUEST (APPROVED)

The procedure for salting roads/cold-weather operations needs to be developed further.

When and how often are the salt trucks calibrated? What are the salt storage and loading procedures? Does the City sweep up excess salt in their parking lots or on their sidewalks? Please provide more information.

Created on 12/30/2019 12:28 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (1/3/2020 10:20 AM)

Edited.

CORRECTION REQUEST (APPROVED)

These procedures must be included in the SWMP.

Procedures for the listed maintenance activities are required to be developed and included in the City's SWMP not just listed as a response to a question in the application. Please develop and include.

Created on 8/27/2019 2:08 PM by **Erica Volansky**

1 COMMENT

Erica Volansky (VolanskyE@michigan.gov) (10/16/2019 12:03 PM)

The procedure for salting roads/cold-weather operations needs to be developed further. When and how often are the salt trucks calibrated? What are the salt storage and loading procedures? Does the City sweep up excess salt in their parking lots or on their sidewalks? Please provide more information.

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.

Attachment SOP - Page 7 - SECTION I

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.

Attachment - City of Romulus Streets Map

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.

Attachment SOP - SECTION I Page 8 4th Paragraph

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.

Attachment SOP - Section H - Disposal of Collected Materials

Managing Vegetated Properties

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

[Commercial Pesticide Application Certification Categories](#)

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

Not applicable

Contractor Requirements and Oversight

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

SOP Section N

CORRECTION REQUEST (APPROVED)

Incorrect reference.

Please change reference to SOP Section N.

Created on 8/27/2019 2:15 PM by **Erica Volansky**

Employee Training

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

Attachment SOP - Page 10 - SECTION M - Employee Training

Section 11. Total Maximum Daily Load Implementation Plan

The USEPA has a document to assist with developing a TMDL Implementation Plan available at the following link.

[Understanding Impaired Waters and Total Maximum Daily Load \(TMDL\) Requirements for Municipal Stormwater Programs](#)

Total Maximum Daily Load Implementation Plan

[adw_tmdl_plan_2019_final.pdf](#) - 09/12/2019 11:28 AM

[ADW-TMDL-MS4-Plan-Priority-Action-Table.xlsx](#) - 09/12/2019 11:30 AM

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

Upload most recent TMDL.

The ADW TMDL plan was approved in August 2019. Please upload the most recent TMDL and associated community specific table. Make sure to update any references if applicable.

Created on 8/27/2019 2:21 PM by **Erica Volansky**

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

Yes

85. If a TMDL(s) was included in the applicant's application notice, provide the name(s) below. If no TMDL was identified, skip to the next section.

Attachment - Page 1 - 1. TMDL AND MS4 Coverage - A., B., C., E.

CORRECTION REQUEST (APPROVED)

Update reference.

The City of Romulus is not in TMDL area for the Smith and Silver Creeks. Please updated this reference to refer to TMDL A, B, C, and E.

Created on 10/16/2019 12:08 PM by **Erica Volansky**

1 COMMENT

Kathryn Ritter (khood@romulusgov.com) (10/25/2019 9:31 AM)

I'm still waiting for our GIS agent to finish updating the map to reflect the spreadsheet I've added. He said he'd have it done by the your deadline of October 31st.

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.

Attachment Page 2 and 3 - II. Prioritizing and Implementation BMPS

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.

Attachment Page 2-3 - II. Prioritizing and Implementation BMPS

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.

Attachment Page 3 - 5 - III. Monitoring Plan

Section 12. Phase I only **Industrial Facility Inspection Program**

Industrial Facility Inspection Program Procedures

NONE PROVIDED

Comment

NONE PROVIDED

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

Industrial facilities include, but are not limited to, the following:

- Industrial facilities that the applicant determines are contributing a substantial pollutant loading to the MS4
- Industrial facilities subject to the Superfund Amendments and Reauthorization Act (SARA)
- Hazardous waste treatment, disposal, storage, and recovery facilities

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

NONE PROVIDED

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

NONE PROVIDED

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

The applicant should consider the following factors when prioritizing an industrial facility:

- Pollutant sources stored on site
- Pollutants of concern
- Proximity to impaired surface waters of the state
- The applicant's violation or complaint history with the facility

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

[Click here to access the State of Michigan Industrial Stormwater program page](#)

Provide the reference to the program submitted above (page and paragraph of attachments): e.g., Attachment A, Page 3, Section b.

NONE PROVIDED

Section 13. Certify and Submit

Comments (As needed)

Updated requests have been completed, however, the Illicit Discharge Ordinance will not be formally adopted until November 25th. Which is the 2nd reading final adoption of it by City Council.

Comment #2 January 3, 2020

Updates have been made and edited PIPP AND SOP downloaded.

Additional Documents (As needed)

NONE PROVIDED

Comment

NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
2/7/2020 3:17 PM	PIPP-romulus.doc	Attachment	Kathryn Ritter
1/3/2020 9:38 AM	SOP.DOCX	Attachment	Kathryn Ritter
10/30/2019 12:58 PM	Outfalls_Facilities.pdf	Attachment	Kathryn Ritter
10/25/2019 9:22 AM	ADW_ERP_TEMPLATE.docx	Attachment	Kathryn Ritter
9/19/2019 1:51 PM	Outfalls_DischargePts.xlsx	Attachment	Kathryn Ritter
9/19/2019 11:14 AM	DRAFT -Ordinance to Add Illicit Discharge & Connection Stormwater Control. Ver 9-17-19.docx	Attachment	Kathryn Ritter
9/12/2019 11:30 AM	ADW-TMDL-MS4-Plan-Priority-Action-Table.xlsx	Attachment	Kathryn Ritter

Date	Attachment Name	Context	User
9/12/2019 11:28 AM	adw_tmdl_plan_2019_final.pdf	Attachment	Kathryn Ritter
9/9/2019 1:57 PM	ADW_CSWRCP_TEMPLATE-County-Part91 (002) (1).docx	Attachment	Kathryn Ritter
9/9/2019 1:48 PM	adw_stormwater_discharge_permit_app_pep_04192019_approved.pdf	Attachment	Kathryn Ritter
9/9/2019 1:20 PM	adw_collaborative_iddep_approved.pdf	Attachment	Kathryn Ritter
8/26/2019 5:37 PM	Part 17 SESC_1645_2016-037EQ_AdminCode_500 feet rule.pdf	Correction Request	Erica Volansky
3/27/2017 10:50 AM	Romulus Ordinance.pdf	Attachment	Kathryn Ritter
3/24/2017 3:08 PM	Addendum.pdf	Attachment	Kathryn Ritter
3/24/2017 1:16 PM	CITY MAP.PDF	Attachment	Kathryn Ritter
3/21/2017 2:22 PM	ADW_POSTCONSTRUCTION_TEMPLATE.docx	Attachment	Kathryn Ritter
3/20/2017 10:16 AM	ADW Public Participation Program.docx	Attachment	Kathryn Ritter

Status History

	User	Processing Status
2/7/2020 3:16:09 PM	Kathryn Ritter	Draft
2/7/2020 3:19:11 PM	Kathryn Ritter	Submitted
4/28/2021 8:33:46 AM	Elaine Wild	Complete

Audit

Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Volansky	8/26/2019 12:06 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	8/27/2019 2:58 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	10/16/2019 12:08 PM

Revisions

Revision	Revision Date	Revision By
Revision 1	3/30/2017 11:09 AM	Kathryn Ritter
Revision 2	9/9/2019 1:10 PM	Kathryn Ritter
Revision 3	10/25/2019 9:21 AM	Kathryn Ritter
Revision 4	1/3/2020 9:02 AM	Kathryn Ritter
Revision 5	2/7/2020 3:16 PM	Kathryn Ritter

CITY OF ROMULUS – DPW

SOP for DPW Facility High Priority Area– PIPP ADDENDUM

COMPREHENSIVE SITE INSPECTIONS – 6 MONTH BASIS

The DPW will inspect all catch basins within the influence of the yard maintenance area bi-yearly for sedimentation control. Inlet filters will be used to control migrating sediment into the system. Upon inspection of the Catch Basin, the vector truck shall be used to remove any debris and sedimentation from the structure as replacement of the inlet filter.

BI-WEEKLY ROUTINE MAINTENANCE

Bi-weekly inspections of the catch basins will be performed to ensure that control measures are sufficiently working to prevent stormwater pollutant runoff.

Public Participation Program for the Alliance of Downriver Watersheds MS4s



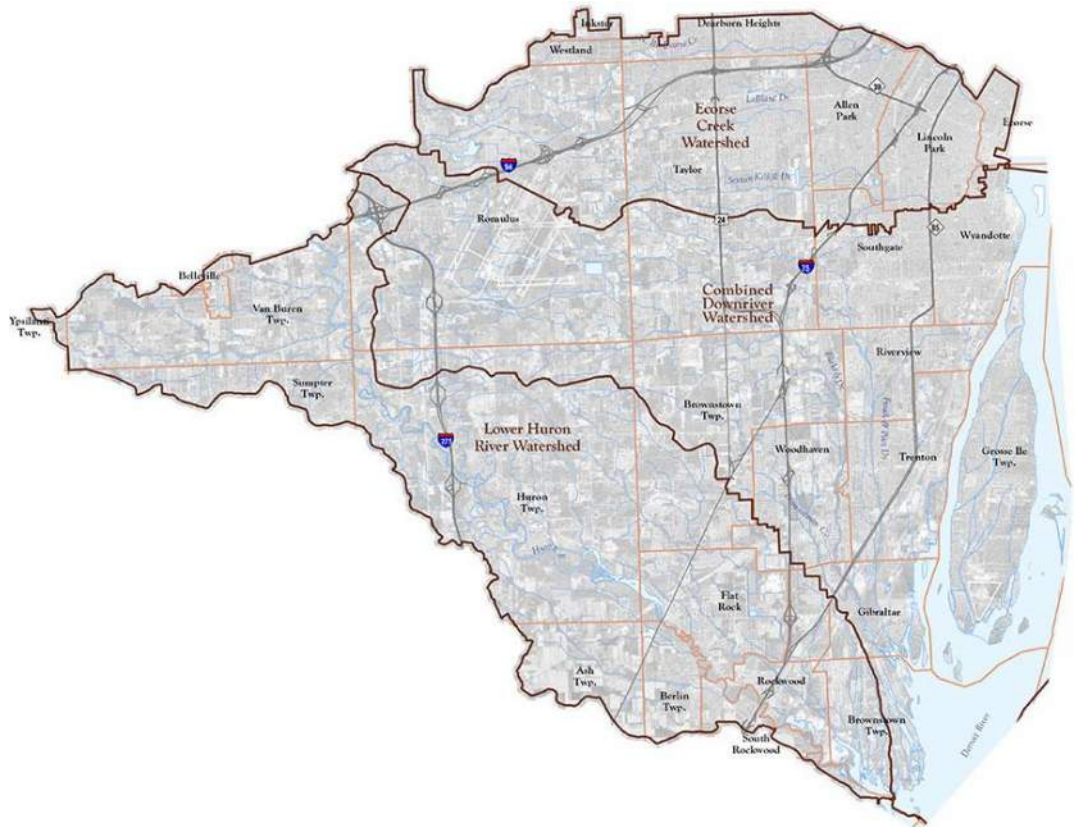
The Public Participation/Involvement Program (PPP) is required by the State of Michigan National Pollutant Discharge Elimination System (NPDES) Permit Application for Discharge of Stormwater to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4).

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

I. GENERAL INFORMATION

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

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



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

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

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

II. COMMUNICATION DURING THE SWMP DEVELOPMENT PROCESS

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

1. Each individual MS4 shall follow local public notice requirements, as appropriate, when informing the public that a stormwater management program must be implemented. Copies of the SWMP shall be available for public inspection, and the public shall be notified of when and where it is available.
2. Each individual MS4 shall participate in and cooperate with the ADW by informing it of activities under their SWMPs, providing copies of the SWMPs and pursuing public input on them, and seeking ways to meet general permit requirements through ongoing programs for water resource protection and enhancement, including water quality monitoring.

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

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

BMP 1.1. Public Notice

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

SWMPs at their individual MS4 websites. Additionally, other means of communication will be used for announcing progress on SWMP elements and soliciting input. These may include publication in local news media outlets, announcements to local boards, associations, other interested groups, at public meetings or major public events, articles in local newsletters, or posts on web sites and social networking sites. Each MS4 will follow any public notice requirements specific to their local jurisdiction. The same public notice procedure will be used following any major SWMP revision.

Timeline: Notice will be provided upon release of a draft permit.

Evaluation: Publication of notice in news media, impressions on ADW website.

Responsible Parties: Listed MS4s will provide SWMPs and the ADW will notify the public within the ADW area via email distribution and posting to the ADW website. Each MS4 will notify the public in their local jurisdictions.

BMP 1.2 Public Access to SWMPs

Description: The ADW and the MS4s will publish and make available copies of the SWMPs on the ADW website, each MS4 website and at each MS4 office.

Timeline: Following review by MDEQ and revision by MS4s, SWMPs will be made available when the draft permit becomes available for public review.

Evaluation: Number of views each of the plans get at each website.

Responsible Parties: The ADW and individual MS4s.

BMP 1.3 SWMP Implementation

Description: The ADW is a watershed implementation group that is open to and encourages public participation. This group meets three times a year (on average). Meeting schedules are posted to the ADW web site and via e-mail distribution lists. Meetings of this group will be the primary point of public input into SWMP implementation and for providing feedback to MS4 representatives.

Timeline: On-going; start in year one of permit.

Evaluation: Document MS4 representative and citizen participation in meetings.

Responsible Parties: MS4 representatives, ADW.

BMP 1.4 SWMP Review

Description: Following public notice of the SWMPs, the ADW and MS4s will accept and consider comments from the public and MDEQ. After revising SWMPs, the ADW and MS4s will post revised drafts and accept public comments before each MS4 finalizes their SWMP.

Timeline: Review completed following initial application and prior to permit issuance.

Evaluation: Comments from the general public.

Responsible Parties: ADW and MS4s.

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN



For the Alliance of Downriver Watersheds MS4s

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

Allen Park
Belleville
Dearborn Heights
Ecorse
Flat Rock
Gibraltar
Grosse Ile Township

Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township

Taylor
Van Buren Township
Wayne County
Westland
Woodhaven
Woodhaven-Brownstown
School District
Wyandotte

May 31, 2019

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ATTACHMENTS

- ATTACHMENT A: Complaint Track Form & Routine Field Work Log
- ATTACHMENT B: Advanced Investigation Procedure for Locating the Source of Suspicious Discharges
- ATTACHMENT C: Regional IDEP Training Program
- ATTACHMENT D: ADW Member Facilities to be Dye-Tested
- ATTACHMENT E: Outfall Screening Procedure for Identifying Potential Illicit Discharges
- ATTACHMENT F: Corrective Action Notification Letter
- ATTACHMENT G: State and Federal Regulatory Mechanisms

I. INTRODUCTION

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

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

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

II. PRIORITY AREAS

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

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

The criteria used to identify them as a priority included:

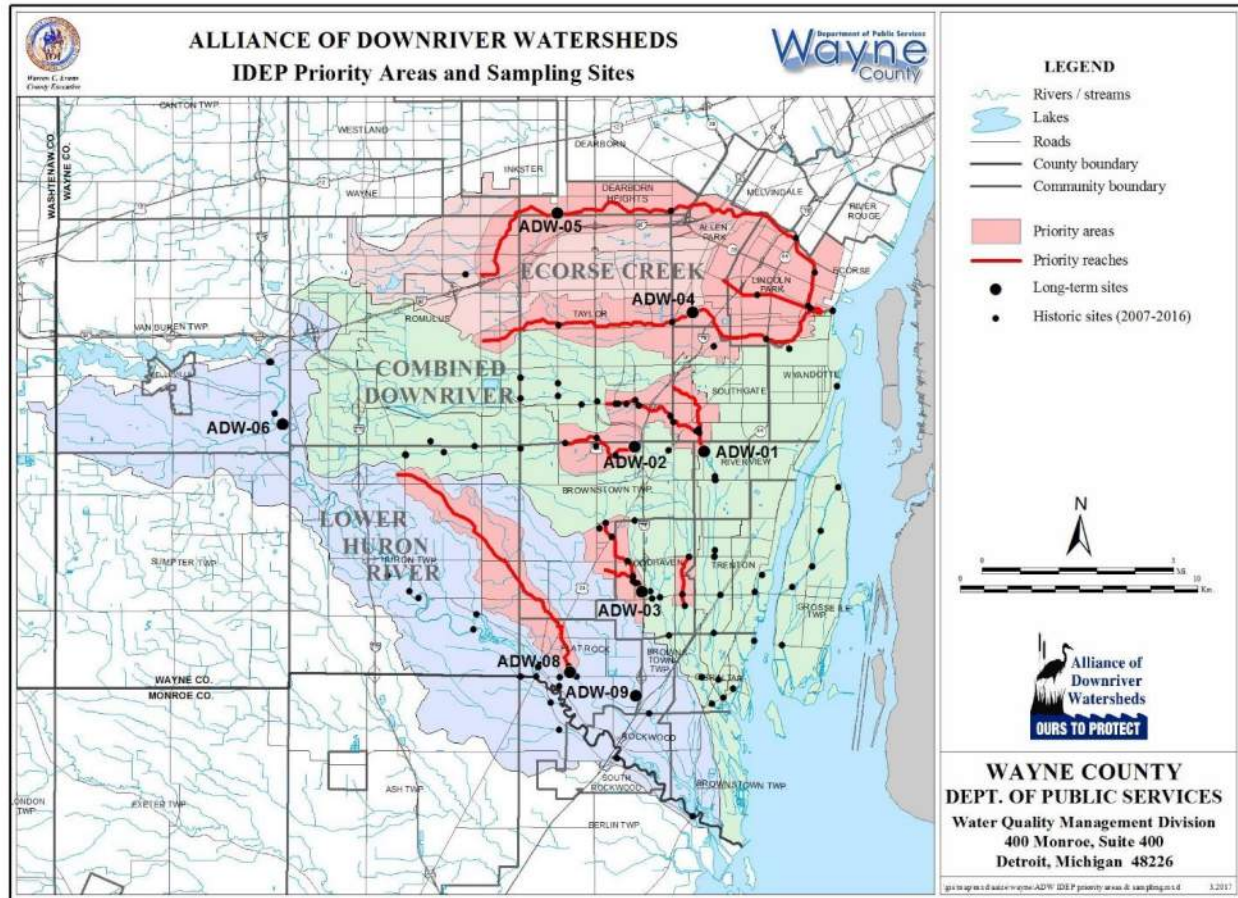
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling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

Priority IDEP Work Areas

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

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

Figure 1: IDEP Priority Work Areas and Monitoring Sites



Routine IDEP Areas

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

III. COLLABORATIVE IDEP ACTIVITIES

IDEP# 1: IDEP Investigative & Progress Evaluation Monitoring

Funding: ADW

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

Schedule: Annually, April – September

ADW Member Responsibilities:

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

Measure of Assessment:

- Number/portion of sites sampled

BMP Goal:

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

IDEP #2: Environmental Hotline and Coordinated Complaint Response

Funding: Wayne County, ADW Members

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

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

Schedule: Continuous

ADW Member Responsibilities:

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

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

Measures of Assessment:

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

BMP Goal:

- 100% of complaints addressed and plan for resolution identified

IDEP #3: Priority Area IDEP Advanced Investigations

Funding: ADW

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

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

ADW Member Responsibilities:

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

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

Measures of Assessment:

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

BMP Goals:

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

IDEP #4: Staff Training

Funding: ADW

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

Investigator Level

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

Alert Observer Level

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

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

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

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

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

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

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of staff trained

BMP Goals:

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

IDEP #5: Inspection of ADW Member Owned Facilities

Funding: ADW

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

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

ADW Member Responsibilities:

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

Measures of Assessment:

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

BMP Goals:

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

IDEP #6: Visual Inspection during Routine Field Operations

Funding: ADW, Wayne County, and Communities

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

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

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

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

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

ADW Member Responsibilities:

- ADW
 - Develop and distribute a consistent procedure and forms for ADW members to appropriately document their response to potential illicit discharge complaints and corrective actions taken to eliminate illicit discharges. See Attachment A.
 - Develop and distribute a log sheet that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities (log to include Wayne County hotline number). See Attachment A.
- Communities, Wayne County and nested school districts
 - Train appropriate field staff to identify signs of illicit discharges and respond accordingly.
 - Require field staff to use the ADW's illicit discharge checklist to document that illicit discharges were looked for during routine MS4 maintenance activities.
 - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
 - For Priority IDEP Work Areas, notify field staff that there is an *E. coli* issue and instruct them to be especially observant and report any suspicious areas to ADW or county staff.

Measures of Assessment:

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

BMP Goals:

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

IDEP #7: Point of Storm Water Discharge – Dry Weather Screening

Funding: Communities and nested school districts

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

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

ADW Member Responsibilities:

- ADW
 - Develop and distribute a consistent procedure and forms for ADW members to appropriately document dry weather screening activities (Attachment E).
 - Maintain a list of community contacts and update annually.
 - Review of reported issues at quarterly ADW Technical Committee meetings.
- Communities and nested school districts
 - Document dry weather screening inspections
 - Track status of complaints handled internally or those referred to them.
 - Track and record follow up communication from resident complaints as appropriate.
 - Investigate and resolve complaints within their MS4.
 - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
 - Perform dry weather screening of new outfalls within 6 months of construction or taking ownership.
- Wayne County
 - Provide technical guidance as requested by local communities.
 - Track the status of any pollution complaints that they investigate.
 - Track and record follow up communication regarding complaints as appropriate.
 - Investigate and resolve complaints within their MS4.
 - Perform dry weather screening of 10% of County/stream crossings using ARC/ADW dry weather screening procedures.

Measures of Assessment:

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

BMP Goals:

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

IDEP #8: Mapping of Storm Water Outfalls to Waters of the State

Funding: ADW with Wayne County providing GIS data management

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

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

ADW Member Responsibilities:

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

Measures of assessment:

- Portion of watershed area with known outfalls mapped in GIS

BMP Goal:

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

IDEP #9: Volunteer Training

Funding: ADW via Public Education and Progress Evaluation budgets

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

Schedule: Annually as volunteer monitoring training occurs.

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of volunteers trained

BMP Goal:

- Training held annually during each year of the permit cycle

IDEP #10: Method to Evaluate IDEP Effectiveness

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

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

Schedule: Continuous with summary report submitted biennially.

ADW Member Responsibilities:

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

IV. CORRECTIVE ACTION NOTIFICATION

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

Discharges from Private Sources to MS4s

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

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

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

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

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

Corrections/Repairs:

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

Discharges from Public Properties to MS4s

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

Discharges from Permittee's Properties

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

Discharges from Septic Systems

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

V. LEGAL AUTHORITY

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

Table 1. IDEP Regulatory Mechanisms Available to Permittees

Discharge Type or Source	Lead Enforcement Agency	Regulatory Authority
Discharges to city and village MS4s (except as noted below)	Local DPWs and Building Depts.	Varies by community. See individual stormwater management plans.
Discharges to school or township MS4s	School or Township	See individual stormwater management plans
Sanitary sewage and waste matter into County Drains	County Drain or Water Resource Commissions	<p>Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of \$25,000 or imprisonment.</p> <p>See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code at: http://legislature.mi.gov/doc.aspx?mcl280-423</p> <p>See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: http://www.legislature.mi.gov/%28S%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&objectName=mcl-280-421</p>
Discharges to County Road Drains	Road Agencies	Public Highways and Private Roads Act 283, 1909 Sect. 224.19b
Soil Erosion from Construction Sites	Part 91 Authority	Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994
Discharges from Onsite Sewage Disposal Systems (OSDS)	Wayne County Dept. of Health	<p>http://www.waynecounty.com/hhs/onsitesewage.htm</p> <p><i>Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta as follows:</i></p> <ul style="list-style-type: none"> -Prohibit discharges: Article III, Sec. 3.13.2 -Right to inspect: Article IV, Sec. 4.3 -Corrective action: Article IV, Sec. 4.5-4.7 -Penalties: Article XVI, Sec. 16.1 <p><i>Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance as follows:</i></p> <ul style="list-style-type: none"> -Right to inspect: Sec. 803 -Corrective action: Sec. 802 -Penalties: Sec. 804-815

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

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

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

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

Source: Oakland County Water Resources Commissioner’s Office

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**Complaint Tracking Form &
Routine Field Work Log**

For the Alliance of Downriver Watersheds MS4s

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Community Name: _____

Complaint made by: _____ Phone #: _____

Date: _____ Time: _____

Location of Problem: _____

Offending Party (if known) _____

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

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

Nature of Emergency: _____

Initial contact made to: 911 City Dept _____
 Wayne County 888-223-2363 PEAS Hotline (State) 800-292-4706
 Other _____

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Investigation Summary Initial Investigation Follow-up Investigation

Date of Investigation: _____ Investigating Agency: _____

Crew Members _____

Location of Discharge: _____

Investigation Location: _____

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

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

Were photos taken? No Yes

Agency Referred to: _____ Agency Contact: _____

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

Content of Communication: _____

Date Corrected or Resolved: _____

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

Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**Advanced Investigation Procedure for Locating the
Source of Suspicious Discharges**

For the Alliance of Downriver Watersheds MS4s

Attachment B

I. Purpose

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

II. Performing Source Investigations

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

Determining Ownership

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

For investigations based on outfall screening results, the ownership step is not required because it is assumed that outfall screening was completed by the owner/operator.

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

Source Investigations

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

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

Attachment B

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

III. Closed Circuit Televising (CCTV)

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

IV. Smoke Testing

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

V. Dye Testing

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

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

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

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

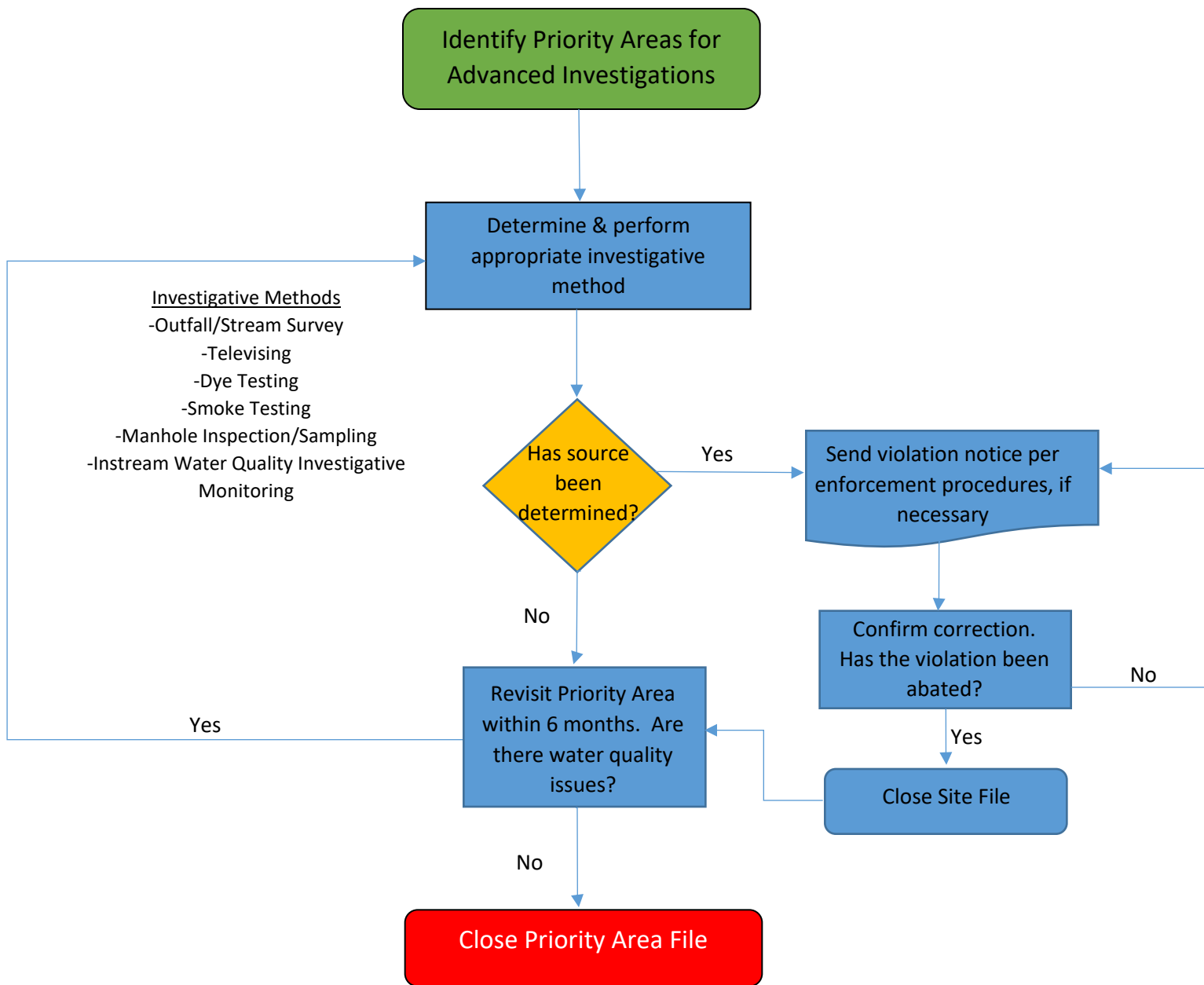
Attachment B

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

Sample dye test forms are included with this Attachment.

VI. Process for Revision

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





Alliance of Downriver Watersheds

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

Facility Information Sheet

Field Inspection Survey WMD Complaint, # _____

Date: _____

Address: _____ Community: _____

Name of Facility: _____

Type of Business: _____

Contact Person: _____ Phone Number: _____

Title: _____

SIC Code: _____ Priority: _____

Watershed: _____ Subwatershed: _____ Subarea: _____

Field Representative(s): _____

River Friendly Partners Program Information Requested: _____



Alliance of Downriver Watersheds

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

Field Inspection Results

Date: _____

Address: _____ Community: _____

Name of Facility: _____

- Proper Connection - The Fixtures “dye tested” in this establishment have been found to be properly connected to the sanitary sewer system. No problems were noticed at time of inspection.

- Incomplete: _____
reason

- No Show - Unsuccessful attempt, unable to detect “dye” in the sanitary sewer.

- Violation/Illicit Connection/Improper discharge - Situation resulting in pollution of surface waters.
 - Illicit Connection
 - Improper Discharge
 - House Keeping

LIST ALL FIXTURES DYE TESTED:

Field Inspection Results

Date _____

Facility: _____

Information to Document:

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



Alliance of Downriver Watersheds

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

Field Notes & Observations

Date: _____ Complaint Number: _____

Address: _____ Community: _____

Name of Facility: _____

Follow Up Inspection

Survey

Complaint

Notes: _____

**STORMWATER DISCHARGE
PERMIT APPLICATION**



Regional IDEP Training Program

For the Alliance of Downriver Watersheds MS4s

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

Introduction

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

Background

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

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

Objective

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

Plan

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

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

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

Cost Sharing

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

Table 1: Traditional IDEP Training Schedule and Responsibilities

Year	Staff Cost¹	Facility/Refreshments²	Registration³	Print and Mail Certificates
2013	ADW, ARC	Wayne County	Wayne County	Wayne County
2015	ADW, ARC	Washtenaw County	Washtenaw County	Wayne County
2017	ADW, ARC	Macomb County	Macomb County	Wayne County

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

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

Year	Staff Cost	Facility/Refreshments³	Registration⁴
2014	Host County ¹ , SEMCOG ²	St. Clair County	SEMCOG
2016	Host County ¹ , SEMCOG ²	Oakland County	SEMCOG

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

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

Macomb County Representative

W. Musterdovich W. MUSTERDOVICH CHIEF DEPUTY MACOMB COUNTY PUBLIC WORKS 05-17-2013
Signature Name/Title COMMISSIONER Date

Oakland County Representative

James W. Wierka JAMES WIERKA / ASST. CHIEF ENG. 4/17/13
Signature Name/Title Date

Saint Clair County Representative

Steve French Steve French DIRECTOR 4-29-13
Signature Name/Title Date

Washtenaw County Representative

Evan Pratt EVAN PRATT Water Resources Commissioner 8/8/12
Signature Name/Title Date

Wayne County Representative

Kelly A. Cave KELLY A CAVE WAYNE CO STORM WATER COORDINATOR 11 APRIL 13
Signature Name/Title Date

SEMCOG Representative

Kathleen Lomako Kathleen Lomako 8/14/2013
Signature Name/Title Date

Alliance of Rouge Communities Representative

Kevin L. Buford Kevin Buford, ARC Chair 3/28/13
Signature Name/Title Date

Alliance of Downriver Watersheds Representative

Mark Gahry Mark Gahry, Chairman May 7, 2013
Signature Name/Title Date

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**ADW Member Facilities
To be Dye-Tested**

For the Alliance of Downriver Watersheds MS4s

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**Outfall Screening Procedure for
Identifying Potential Illicit Discharges**

For the Alliance of Downriver Watersheds MS4s

Attachment E

I. Purpose

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

II. Performing Field Observations at Outfalls

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

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

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

III. Performing Field Screening

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

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

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

Attachment E

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

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

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

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

Table 1 – Guidance for Screening Results

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

IV. Process for Revision

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

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**Corrective Action Notification
Sample Letter**

For the Alliance of Downriver Watersheds MS4s

Attachment F

NOTICE OF ILLEGAL DISCHARGE OR CONNECTION SAMPLE LETTER

<Person or Business Name>

<Address Line 1>

<Address Line 2>

Dear <Property Owner>:

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

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

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

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

Sincerely,

<Name>

<Title>

**STORMWATER DISCHARGE
PERMIT APPLICATION**



State and Federal Regulatory Mechanisms

For the Alliance of Downriver Watersheds MS4s

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.**



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.**



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.**



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.**



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

Acronyms used in table:

AQD = Air Quality Division

AST = Above Ground Storage Tank

CAA = Clean Air Act

CAFO = Concentrated Animal Feeding Operation

CERCLA = Comprehensive Environmental Response, Compensation

and Liability Act of 1980

CFR = Code of Federal Regulations

CWA = Clean Water Act

DEQ = Michigan Department of Environmental Quality

DOT = Department of Transportation

EHS = Extremely Hazardous Substance

EPA = U. S. Environmental Protection Agency

EPCRA = Emergency Planning & Community Right-to-Know Act

FIFRA = Federal Insecticide, Fungicide, & Rodenticide Act

FL/CL = Flammable and combustible liquids

FR = Federal Register

HAP = Hazardous Air Pollutant

HazMat = Hazardous Materials

HB = House Bill

LARA = Michigan Department of Licensing & Regulatory Affairs

LEPC = Local Emergency Planning Committee

LNG = Liquefied Natural Gas

LPG = Liquefied Petroleum Gas

MCL = Michigan Compiled Laws

MDARD = Michigan Department of Agriculture & Rural Development

MIOSHA = Michigan Occupational Safety and Health Administration

MSP = Michigan Department of State Police

NRC = National Response Center (U.S. Coast Guard)

NREPA = Natural Resources & Environmental Protection Act

ODWMA = Office of Drinking Water & Municipal Assistance

OOGM = Office of Oil, Gas, and Minerals

OPS = Office of Pipeline Safety (US DOT)

OSC = On Scene Coordinator

OWMRP = Office of Waste Management & Radiological Protection

PA = Public Act (Michigan)

PCB = Polychlorinated biphenyl

PEAS = Pollution Emergency Alerting System

PHMSA = Pipeline & Hazardous Materials Safety Administration

RMP = Risk Management Program

RRD = Remediation and Redevelopment Division

SARA = Superfund Amendments and Reauthorization Act of 1986

SERC = State Emergency Response Commission

TRI = Toxic Chemical Release Inventory

TSCA = Toxic Substance Control Act

TSDF = Treatment, Storage & Disposal Facility

US DOT = U.S. Department of Transportation

USNRC = U. S. Nuclear Regulatory Commission

UST = Underground Storage Tank

WRD = Water Resources Division

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Additional reporting requirements might be found in **permits, licenses, registrations, contingency and pollution prevention plans,** and local ordinances.



STANDARD OPERATING PROCEDURE CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

CITY OF ROMULUS
12600 WAYNE ROAD
ROMULUS, MICHIGAN 48174



APRIL 2017
STANDARD OPERATING PROCEDURE
CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

SECTION A – PURPOSE

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

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

SECTION B – NOTIFICATION PROCEDURE

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

Through the site plan review process, the City Romulus ensures that construction activity one acre or greater in total earth disturbance or located within 500 feet of the water's edge of a lake or stream with the potential to discharge to the MS4 does obtain a Part 91 Permit and/or a State of Michigan Permit by Rule or is reviewed by an approved Authorized Public Agency through the site plan review process.

SECTION C – MEASUREABLE GOALS

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

- Number of Part 91 related complaints received and referred to the County by the City of Romulus Building Inspector.
- Number of Part 91 permits issued by the County within the City of Romulus.

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

SECTION D – REPORTABLE DISCHARGES

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

SECTION E –STATE OF MICHIGAN PERMIT BY RULE

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

SECTION F – PROCESS FOR REVISION

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

STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

CITY OF ROMULUS
12600 WAYNE ROAD
ROMULUS, MICHIGAN 48174



APRIL 2017

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires an Enforcement Response Procedure (ERP) to address violations of the ordinance(s) or regulatory mechanism(s) identified in the Stormwater Management Plan.

SECTION B – GENERAL PENALTY

Chapter 62, Article II, Section 62, Division 4A. Illicit Discharge and Connection Stormwater Control Ordinance. Specifically Chapter 62, Section 62-404 – PENALTIES:

- (a) Any person found to be violating any provisions of this article except section 62-402 shall be served by the city with written notice within 1-2 business days stating the nature of the violation and providing a 5 day time limit for the satisfactory correction thereof. If correction has not been made within the 5 day time frame a second notice will be sent and another 5 days will be given to correct the issue. If corrections are still not met from the second attempt, a third notice will be sent of potential misdemeanor if corrections are not made within 5 days. The offender shall, within the period of time stated in such notice, permanently cease all violations.
- (b) Any person who shall knowingly continue any violation beyond the time limit provided for in subsection (a) of this section shall be guilty of a misdemeanor.
- (c) Any person violating any of the provision of this article shall become liable to the city for any expense, loss, or damage occasioned the city by reason of such violation

SECTION C – PART 91 COUNTY ENFORCEMENT AGENCY

Wayne County is an approved County Enforcement Agency under the Part 91 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as Amended, and the Wayne County Soil Sedimentation Control Ordinance No. 2001-759 in 35 communities, including the City of Romulus.

C.1 Section 94-1 Wayne County, Michigan Code of Ordinances – Designation of County Enforcement Agency

“The Department of Environment shall be the county enforcing agency, and shall be responsible for administration and enforcement of Part 91, Soil Erosion and Sedimentation Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (“Part 91”), and the regulations promulgated thereunder in Wayne County.”

C.2 Section 94-5 Wayne County, Michigan Code of Ordinances – Municipal Civil Infractions

“(a) Violation; municipal civil infraction. A person who violates any provision of Part 91, the regulations promulgated thereunder, or this chapter (including, without limitation, any notice, order, permit, agreement or determination promulgated, issued, made or entered by the county under this chapter, Part 91 or the regulations promulgated thereunder) is responsible for a municipal civil infraction, subject to payment of a civil fine of not less than \$250.00 per day and not more than \$2,500.00 per day for each infraction, plus costs and other sanctions.

(b) Repeat offenses; increased fines. Increased fines may be imposed for repeat offenses. As used in this section, “repeat offense” means a second (or any subsequent) municipal civil infraction violation of the same requirement or provision of this chapter (i) committed by the person within any 12-month period and (ii) for which the person admits responsibility or is determined to be responsible. The increased fine for a repeat offense under this chapter shall be as follows:

- (1) The fine for any offense that is a first repeat offense shall be not less than \$500.00, plus costs.*
- (2) The fine for any offense that is a second repeat offense or any subsequent repeat offense shall be not less than \$1,000.00, plus costs.*

(c) Amount of fines.

(1) Municipal civil infraction citations. Subject to the minimum fine amounts specified in subsections 94-5(a) and (b), the following factors shall be considered in determining the amount of a municipal civil infraction fine following the issuance of a municipal civil infraction citation for a violation of this chapter: the type, nature, gravity, magnitude, severity, frequency, duration, preventability, potential and actual effect, cause (including whether negligent or intentional) and economic benefit to the violator (such as delayed or avoided costs or competitive advantage) of a violation; the violator’s recalcitrance, cooperation or efforts to comply; the violator’s compliance history (regardless whether prior enforcement proceedings were commenced); the economic impacts of the fine on the violator; and such other matters as justice may require. A violator shall bear the burden of demonstrating the presence and degree of any mitigating factors to be considered in determining the amount of a fine. However, mitigating factors shall not be considered unless it is determined that the violator has made all good faith efforts to correct and terminate all violations.

(2) Municipal civil infraction notices; schedule of fines. Notwithstanding any provision of this chapter to the contrary, the amount of a municipal civil infraction fine due in response to the issuance of a municipal civil infraction notice for a violation as provided by subsection 94-5(a) shall be according to the following schedule:

For violation of any provision of this ordinance:

First offense\$250.00

First repeat offense\$500.00

Second repeat offense (or any subsequent repeat offense)\$1,000.00

For any fine not paid in full at the Bureau within 30 days of the time specified for appearance in the municipal civil infraction violation notice, the fine amount due shall automatically be double the amounts listed immediately above. A copy of this schedule shall be posted at the Wayne County Municipal Ordinance Violations Bureau.

(d) Authorized county officials. The following persons are "authorized county officials" for purposes of issuing municipal civil infraction citations (directing alleged violators to appear in district court) or municipal civil infraction violation notices (directing alleged violators to appear at the Wayne County Municipal Ordinance Violations Bureau) for violations under this chapter: the Director of the Department of Environment and his or her designees and authorized representatives; the Land Resource Management Division Director and his or her designees and authorized representatives; and the Wayne County Sheriff and his or her designees and authorized representatives.

(e) Except as otherwise provided by this section, the procedures for municipal civil infraction actions shall be as set forth in Chapter 2 ("Municipal Civil Infractions") of the Wayne County Code.

SECTION D – ENFORCEMENT TRACKING

The City of Romulus will track all violations and issued permits. The following information will be collected and used for tracking records for each violation that is imposed by the City of Romulus.

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

SECTION E – PROCESS FOR REVISION

Any questions on this policy and procedure should be directed to the Stormwater Manager or the DPS/DPW Director/Other. This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.

STANDARD OPERATING PROCEDURE POST CONSTRUCTION STORMWATER RUNOFF CONTROL

CITY OF ROMULUS
12600 WAYNE ROAD
ROMULUS, MICHIGAN 48174



APRIL 2017

SECTION A – PURPOSE

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

SECTION B – ADOPTION OF COUNTY STANDARDS

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

SECTION C – MEASURABLE GOALS

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

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

These metrics will be tracked over the reporting cycle that is specified in the City of Romulus Certificate of Coverage.

SECTION D – PROCESS FOR REVISION

This procedure shall be reviewed every two years by the City of Romulus DPW Director for any updates to streamline the requirements.

**STORMWATER DISCHARGE
PERMIT APPLICATION
COLLABORATIVE
PUBLIC EDUCATION PLAN**



For the Alliance of Downriver Watersheds MS4s

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

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

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Exhibit A – Table of PEP Tasks by Topic and Activity

I. INTRODUCTION

Purpose of Public Education Plan

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

Federal Phase II Storm Water Regulations

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

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

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

Required Public Education Plan Elements

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

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

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

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

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

For all applicable topics, the PEP shall identify:

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

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

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

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

II. COLLABORATION OF WATERSHED PARTNERS

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

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

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

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

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

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

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

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

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

III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

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

Watershed-Wide Priority Topics

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

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

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



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

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

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

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



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

IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs

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



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

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

Delivery Mechanism: Coordinated by the ADW, permittees will participate in the bulk printing and

distribution of a Watershed Community Calendar to residents. The calendar will include a social media-driven photo contest where residents will be encouraged to post and tag photos related to stormwater pollution-reducing behaviors on social media.

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

Target Audience: Residents.

Year/Frequency: Biannually (even calendar years).

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

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

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

Topics Addressed: A-J

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

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

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

Target Audience: Residents.

Year/Frequency: Biannually (odd calendar years).

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

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

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

Topics Addressed: A-J

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

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

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

Target Audience: Residents, visitors, community leaders.

- Year/Frequency:** 2-3 events annually for the ADW collaboratively. Permittee placement of ADW educational posters or pop-up display in at least 1 permittee location or public venue or meeting or event in the permittee's community per year.
- Goal:** The ADW will produce/provide a pop-up display for ADW and permittee use and a set of educational posters for each permittee during the permit cycle. The ADW will collaboratively host the pop-up display at two regional events annually. Permittees will display posters or host the pop-up display in at least one location or at one community event annually.
- Assessment:** Name, date and location of event where the ADW hosted the pop-up display; Permittees will also report the location, date and name of meeting/event (if applicable) where they placed posters or hosted the pop-up display in their permittee locations, public venues, meetings/events.
- Responsible Parties:** ADW and permittees.
- Topics Addressed:** A-J

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

- Delivery Mechanism:** The ADW supports the Michigan Green Schools Program by providing incentives and recognition to participating schools in the ADW area who strive to earn and maintain Green School status. Past incentives have included trees for planting at school locations and educational materials featuring their stormwater benefits. More recently the ADW provided professionally run, curriculum-based in-school watershed workshops and educational signage for five schools earning the Green School designation. The ADW will continue to offer these incentives and educational opportunities to Green Schools annually throughout the permit cycle.
- Key Message:** Watershed awareness and stewardship.
- Target Audience:** Wayne county elementary, middle and high school students and teachers
- Year/Frequency:** Annually.
- Goal:** The ADW will engage at least three Green Schools in the ADW area each year during the permit cycle in incentives and educational opportunities.
- Assessment:** ADW will report a list of schools with number of students participating in tree plantings, watershed workshops or other ADW incentives and educational opportunities;
List of schools displaying ADW-provided educational signage or distributing ADW materials;
Number of schools including water-related activities in their Green Schools applications.
- Responsible Parties:** Wayne County (Green Schools program coordinator) and ADW
- Topics Addressed:** A, B, I

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

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

from regional cooperating partners to distribute these materials. Permittees will help promote these programs by distributing materials individually within their communities, providing literature and posting volunteer event opportunities at customer service locations, on web sites, on social media outlets and in newsletters. The ADW will collect and provide information ongoing to permittees on volunteer opportunities prior to events.

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

Activity #6: Stream and river crossing road signs

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

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

Activity #7: Participate in regional partnership activities

Delivery Mechanism: The ADW and permittees will seek to participate and collaborate with regional partners such as SEMCOG, the Alliance of Rouge Communities, Great Lakes Commission, Friends of the Detroit River, Detroit International Wildlife Refuge and others in activities that further public education on watershed awareness and stormwater issues. The ADW will attend regional partner meetings and report potential opportunities to ADW members.

Key Messages: Collaborative efforts are effective at reaching a greater number of target audiences with persuasive messaging that works.

Target Audience: Stakeholders of partner organizations.

Year/Frequency: 3-4 meetings annually.

Goal: The ADW collaboratively will identify opportunities to build upon and improve collaborative public education efforts by seeking out and attending at least three meetings annually with regional groups working on watershed awareness and stormwater issues.

Assessment: ADW provided list of meetings with date, location, meeting topic and participating groups and any resulting opportunities identified and reported to permittees.

Responsible Parties: ADW and individual permittees.

Topics Addressed: A-K

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

Delivery Mechanism: Permittees will educate the public on illicit discharges and work with Wayne County to publicize county-wide public reporting and response system for illicit discharges or improper disposal of materials into local storm drain systems. A 24- Hour Environmental Hotline is in place and administered by the Wayne County Department of Public Services. The County promotes the use of the 24-Hour Environmental Hotline on County web sites. Permittee efforts will include providing public information and promoting the Hotline at their customer service locations, on web sites and social media outlets and in newsletters.

Key Messages: Prevention and reporting of illicit discharges and/or improper disposal of materials into MS4s.

Target Audience: Residents, visitors, commercial and industrial businesses, local government officials and employees.

Year/Frequency: Ongoing promotional efforts.

Goal: The ADW and permittees will annually distribute materials with the hotline number referenced and will promote the hotline on the ADW and permittee websites and social media outlets or newsletters.

Assessment: Number of materials distributed annually with hotline number referenced reported by ADW for collaborative efforts and reported by permittees for permittee efforts.

Responsible Parties: -Number of views on ADW website and social media reported by ADW
ADW, Wayne County, permittees.
Topics Addressed: B, C, K

Activity #9: Promote water resource protection workshops

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

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

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

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

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

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

Responsible Parties: Permittees will promote workshop events as developed by outside agencies.
Topics Addressed: K in particular, but also A-J

Activity #10: Promote county household hazardous waste reduction program

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

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

Approved by EGLE May 2019

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

V. EXISTING AND PROPOSED INDIVIDUAL PUBLIC EDUCATION BMPs

Reported above and as follows:



Activity #X: Educational Brochures and Videos

Delivery Mechanism: City Website, City Cable Channel, Social Media
Pamphlets at City Buildings

Key Messages:

Target Audience:

Year and Frequency:

Goal:

Assessment:

Responsible Parties:

Topics Addressed:

VI. OTHER INVOLVED ORGANIZATIONS

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

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

VII. EVALUATION OF EFFECTIVENESS

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

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

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

VIII. PERIODIC PROGRESS REPORT

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

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

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

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

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

Permittees in the Alliance of Downriver Watersheds:

Allen Park

Belleville

Dearborn Heights

Ecorse

Flat Rock

Gibraltar

Grosse Ile Township

Inkster

Lincoln Park

Melvindale

Riverview

Rockwood

Romulus

Southgate

Sumpter Township

Taylor

Van Buren Township

Wayne County

Westland

Woodhaven

Woodhaven-Brownstown School District

Wyandotte

STORMWATER DISCHARGE PERMIT APPLICATION
 COLLABORATIVE PUBLIC EDUCATION PLAN TABLE

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

Total Maximum Daily Load (TMDL) Implementation Plan for the Alliance of Downriver Watersheds MS4s in Wayne County



*TMDL Plan Approved by Water Resources Division on May 31, 2019
Detroit River TMDL added on August 19, 2019 and approved August 26, 2019*

The Michigan Department of Environmental Quality (MDEQ), under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit application, requires a plan or other documentation outlining how each Municipal Separate Stormwater Sewer System (MS4) will "make progress toward achieving the pollutant load reduction requirement" in each TMDL listed in each applicant's application notice. The purpose of this document is to provide the collective watershed plan for **addressing relevant TMDLs in the Alliance of Downriver Watersheds in Wayne County by MS4s** for the purpose of stormwater permit compliance through the permit cycle starting after 2016. This document addresses the permit application sections VII.86 through VII.88. It should be noted that this plan addresses only stormwater sources of impairments related to TMDLs and is not a *comprehensive* TMDL implementation plan.

I. TMDL AND MS4 COVERAGE

This TMDL Plan is submitted on behalf of the following Phase I and II MS4s within the Alliance of Downriver Watersheds, for each of the below-listed TMDLs, with their target loads included:

A. *Excessive bacteria (E. coli), and sediment in the Ecorse River*

Targets: For bacteria, May-October – 300 E. coli per 100 ml daily maximum and 130 E. coli per 100 ml as a 30-day geometric mean. November-April – 1,000 E. coli per 100 ml daily maximum. For sediment, Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Allen Park	Romulus
Dearborn Heights	Southgate
Ecorse	Taylor
Inkster	Wayne County
Lincoln Park	Westland
Melvindale	Wyandotte

B. *Sediment in Brownstown Creek and Blakely Drain – Marsh Creek*

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of "acceptable." Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Gibraltar	Trenton
Riverview	Wayne County
Romulus	Woodhaven
Taylor	

C. *Sediment in Frank and Poet Drain*

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of “acceptable.”

Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Gibraltar	Taylor
Riverview	Trenton
Romulus	Wayne County
Southgate	Woodhaven

D. *Habitat and Flow Alterations in Smith and Silver Creeks*

Note: These creeks are listed on the impaired waters list, but do not have a TMDL developed. While no additional stormwater management effort is required for these, the ADW partners will endeavor to meet the below targets that are used in drainages with existing TMDLs.

Target: Primary – macroinvertebrate Procedure 51 score of at least -4, or a rating of “acceptable.”

Secondary – Annual mean wet-weather TSS concentration of 80 mg/l or less.

Flat Rock	Wayne County
Gibraltar	Woodhaven
Rockwood	

E. *Excessive bacteria (E. coli) in the Detroit River*

Targets: May-October – 300 *E. coli* per 100 ml daily maximum and 130 *E. coli* per 100 ml as a 30-day geometric mean. November-April – 1,000 *E. coli* per 100 ml daily maximum.

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

II. PRIORITIZING AND IMPLEMENTATION BMPS

The MS4s in the Alliance of Downriver Watersheds have put forth substantial effort and resources to reduce the sources of impairments related to the TMDLs listed in the previous section. These partner organizations, along with non-MS4 entities have developed a number of general and specific plans to address watershed impairments. These plans direct the current and future project and program priorities. The suite of projects and programs already put in place contributed to significant impairment reduction, as evidenced by data collected through on-going monitoring (see [monitoring report](#) for

details, or in Appendix B for example).

To comply with NPDES stormwater permit requirements, the above-listed MS4s submit that the suite of Best Management Practices (BMPs) contained in the attached Priority Actions table represents each MS4's project priorities that will be implemented during the permit cycle to collectively make progress toward achieving each of the TMDL pollutant load reduction targets. Each MS4 has attached a table of BMPs that identifies the targeted TMDL pollutants (i.e. sediments, flow alterations or bacteria where relevant) and the priority of the BMP. In many cases, no additional prioritization is needed, as the activity is a general (G) stormwater treatment BMP and will be applied across the MS4 and watershed, and not specific to a particular drainage or impairment. For those BMPs that are area or pollutant specific, data from the monitoring program will be used to help establish priorities for implementation. In these cases, BMPs are classified as high (H), medium (M) or low (L) priority for each TMDL. The high priority BMPs will first be implemented in creeksheds or drainage areas that are determined (through monitoring) to be greater sources of the TMDL pollutant or impairment. Conversely, medium and low priority BMPs will be implemented in these TMDL-pollutant source areas after high priority BMPs are implemented.

III. MONITORING PLAN

A summary of past monitoring results and conclusions related to TMDLs in the watershed is included in monitoring reports found on the [ADW Initiatives page](#). The most recent published report is included in Appendix B, but updated monitoring results will be found on the webpage above. The summaries provided are based primarily on data collected through HRWC's Water Quality Monitoring Program, which has been funded in part by MS4s. Currently the MS4s and other watershed partners plan to continue to support this program to seasonally monitor ADW tributaries for TMDL pollutants. However, for the purposes of NPDES stormwater permit compliance, the MS4s commit to the following Monitoring Plan.

1. MS4s will support the collection of water quality samples from sites that are located at or near major tributary mouths. Figure 1 shows a map of the original long-term monitoring sites. An additional site was added as an investigative site in 2016 and then converted to a long-term site thereafter, bringing the total number of long-term sites to nine. The added site is located on the Huron River at the Fort Street bridge crossing. A current map of all water quality monitoring sites is located at the [Chemistry and Flow Monitoring website](#).
2. Samples will be collected at least twice during the permit cycle, not including the data included from previous monitoring. Sampling years will be in year one and year four. At least one sampling event will take place at each of the nine sites. An effort will be made to sample water quality parameters during a representative (i.e. >0.25" and <1.5") wet-weather event. For these wet-weather events, samples will be collected during the rising period of the flow hydrograph or within 6 hours of the peak storm flow. Currently, sampling under the ADW monitoring program occurs much more frequently than this – twice per month, April through September each year, with additional sampling at 3-4 upstream investigative sites each year. Several wet-weather events are sampled during this schedule, plus an autosampler is used to sample multiple times during wet weather events from the beginning of the storm to after peak flow. The ADW plans to continue this monitoring regime, though it commits to twice during the permit cycle.

3. Samples will be collected following procedures identified in ADW's Monitoring Program QAPP (see Appendix A). Samples will be analyzed by the Ypsilanti Community Utility Authority Laboratory or other certified lab for the following concentrations: Total Phosphorus (TP), Total Suspended Solids (TSS), and *E. coli*.
4. Stream flow estimates will be obtained from existing stations during the dates and times water quality samples are collected.
5. The pollutant concentrations and stream flow estimates will be used to update pollutant loading models and estimate pollutant load reductions. These results will be summarized in a brief report to be shared with the public via HRWC and/or MS4 websites at least twice during the permit cycle.
6. Depending on the results from long-term monitoring sites, additional short-term investigative sites will be selected upstream in attempt to identify potential source areas. These sites will be sampled within an hour of sampling at the downstream site so that results can be compared and better define pollutant source locations. Results from this investigation will be shared with the appropriate contacts under the Illicit Discharge Elimination Program (see separate IDEP plan).
7. Any sites with sample results above the previously listed TMDL targets will be resampled to confirm and average results.
8. A plan for implementing BMPs in TMDL areas was developed and described in section II and a list of BMPs to be implemented by MS4s was included with each MS4's permit application. BMP implementation will begin within a year in these areas. If after implementation of high-priority BMPs TMDL targets continue to be exceeded or target parameter values increase in severity, MS4s will re-evaluate the plan and begin implementing additional high or medium-priority BMPs within a year after making this determination. BMPs will be selected for implementation according to the strategy described in section II.
9. Based on a review of year one and year four data and summary reports, BMP implementation will be reviewed and BMP implementation plans may be updated or revised to ensure progress toward achieving TMDL pollutant load reductions. BMPs that are employed will be evaluated using a before and after analysis of the parameter that is deemed impaired in a given TMDL. For bacteria TMDL areas, a sampling event with levels exceeding the single-sample *E. coli* standard will be compared to dry-weather sampling results (during warm-weather, productive months, or other conditions similar to original samples) after the BMP (or suite of BMPs) is deployed.

For sediment-based TMDLs, wet-weather TSS sample results from before and after BMP implementation will be compared. Ideally, multiple samples will be collected before and several years after BMPs are implemented. A before-after decrease in target parameters will be considered "progress" toward TMDL targets. If the after-implementation results are below target water quality standards, the BMPs will be considered successful at meeting the TMDL targets for the waterbody sampled and the MS4s in the contributing area (watershed). If multiple samples are collected, trend lines will be established to determine the degree of progress towards TMDL targets. Geometric means of qualified (i.e. meeting sampling condition

requirements) post-implementation results will be used for *E. coli*, and simple means will be used for TSS results. Ultimately, to delist an impairment, additional sampling will be needed, which is beyond the scope of MS4 permit requirements to comply with water quality standards.

In addition to this stormwater sampling plan, ADW partners currently collect macroinvertebrates three times a year at sites throughout the Watershed (see Figure 2), which helps track progress towards the primary target of biota (sediment) TMDLs. Improvements in macroinvertebrate diversity (i.e. Procedure 51) will ultimately be necessary for delisting biota impairments. Sampling protocols for macroinvertebrates are also included in Appendix A, and results are reported along with water quality results in summary reports on the [ADW Initiatives page](#). The most recent published complete report (2013) is included in Appendix B. Figure 2 illustrates the Fall 2014 status and trends of macroinvertebrate sampling sites.

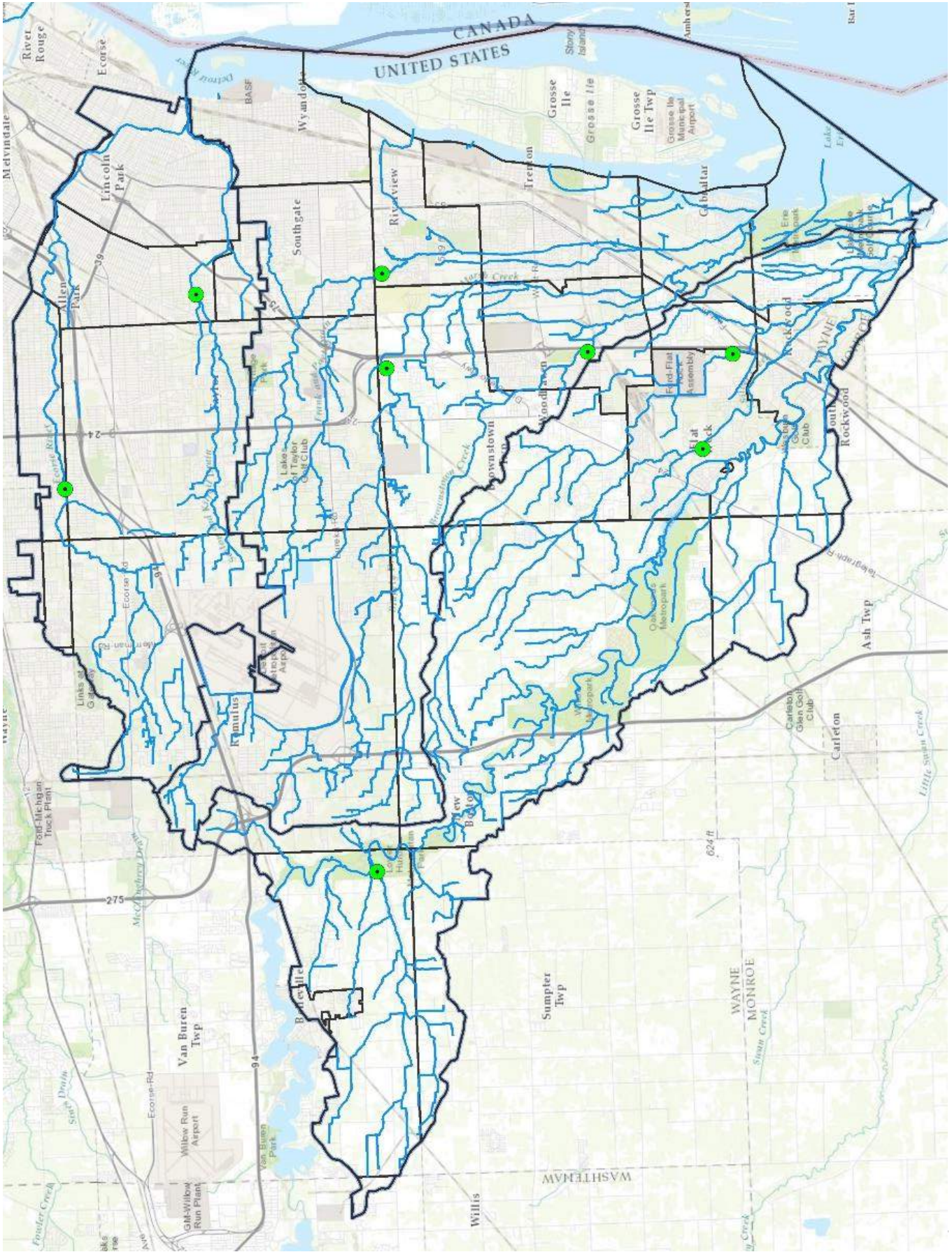


Figure 1. Long-term water quality monitoring stations in the Alliance of Downriver Watersheds

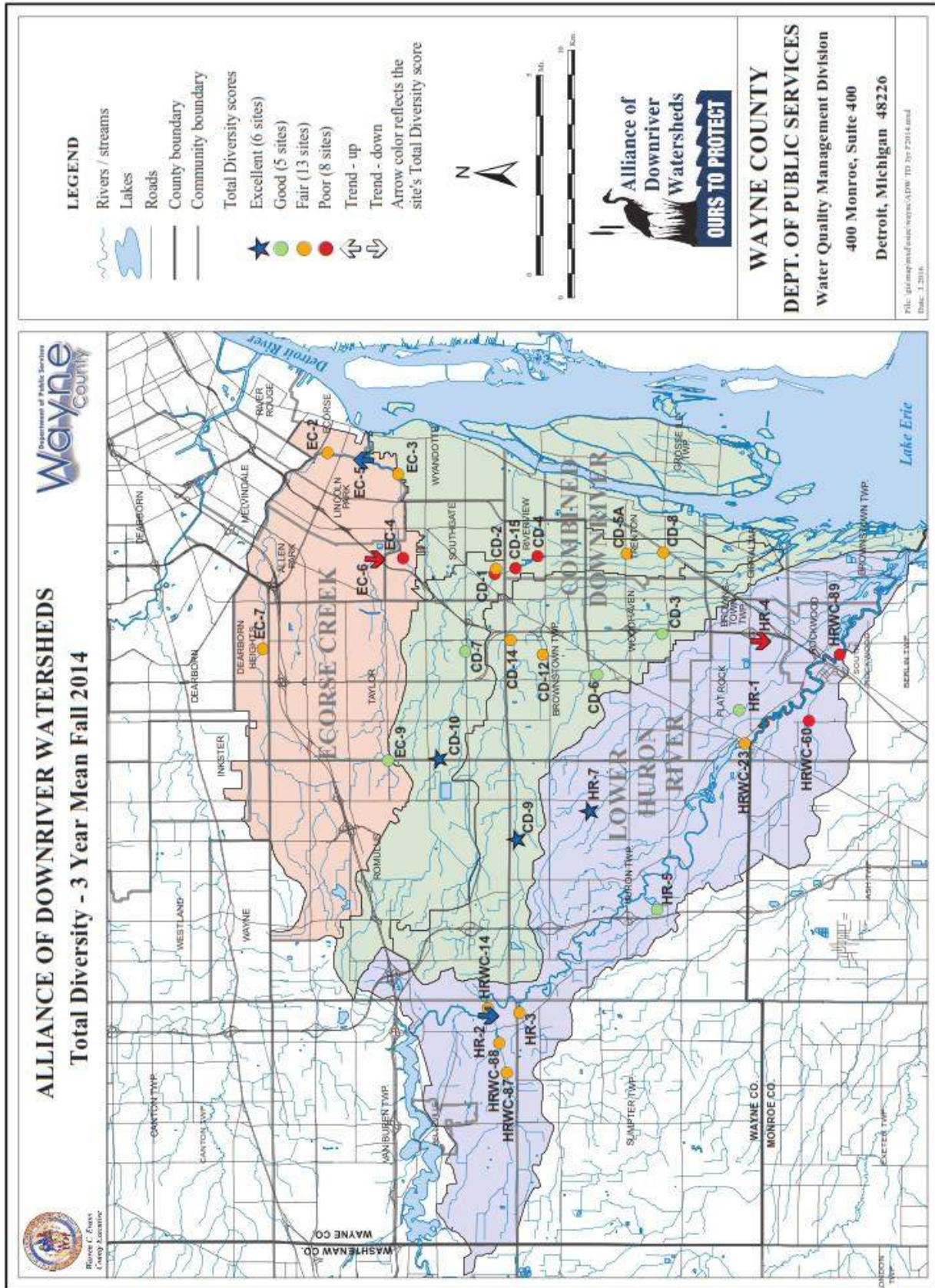


Figure 2. 2014 macroinvertebrate sampling locations and results in ADW.

SWMP Priority Actions for Total Maximum Daily Load (TMDL) Progress

The table below lists stormwater BMPs that are targeted to improve water quality impairments listed by TMDL affected, and the SWMP section they apply to. If the BMP addresses a TMDL, high (H), medium (M) or low (L) priority is indicated, or (G) indicates general implementation.

[Insert MS4 Name]

Section*	SWMP Actions for (City of Romulus)	Biota (Flow, sedimentation) TMDL	Bacteria (E.coli) TMDL
ERP	<i>Track instances of non-compliance as required under the permit</i>	G	G
PPP	<i>Access to the stormwater management plan</i>	G	G
PPP	<i>Alliance of Downriver Watersheds (Watershed group), and</i>	G	G
PPP	<i>Stormwater Management Program (SWMP) review.</i>	G	G
PPP	<i>Participation in Watershed Groups</i>	G	G
PEP	<i>Distribute Informational Materials</i>	H	H
PEP	<i>Watershed Community Calendar</i>	G	G
PEP	<i>Information in Community Newsletters and on Websites - Educational Content</i>	G	G
PEP	<i>Local Newspaper and Web/Other Advertisements</i>	G	G
PEP	<i>Promote Water Resource Protection Workshops</i>	H	H
PEP	<i>Volunteer Stream Monitoring</i>	G	G
PEP	<i>Catchbasin/Storm Drain Labeling</i>	M	H
PEP	<i>Riparian Land Management Information</i>	H	H
PEP	<i>Displays and Outreach at Local and Regional Fairs and Community Events</i>	G	G
PEP	<i>Promote County-wide Compliant Tracking and Response System</i>	G	G
PEP	<i>Stream and River Crossing Road Signs</i>	G	G
PEP	<i>Wayne County Home Toxics Reduction Program</i>	G	G
PEP	<i>Promote Drug Take Back Programs</i>	G	G
IDEP	<i>Dry Weather Screening Program & Data Collection</i>	L	H
IDEP	<i>Illegal Dumping/Spill Response & Database</i>	G	G
IDEP	<i>Environmental reporting line / Tracking</i>	G	G
IDEP	<i>Time of Sale & Field Inspections</i>		H
IDEP	<i>Pollution Prevention (P2) Program</i>	L	H
IDEP	<i>Staff Training</i>	L	H
IDEP	<i>Dye Testing</i>	L	H
SESC	<i>Soil Erosion and Sedimentation Control (SESC) Programs</i>	H	L
SESC	<i>SESC Inspections</i>	H	L
SESC	<i>Discharge notifications</i>	H	H
SESC	<i>State of Michigan – Permit-by-Rule Notification</i>	H	H
PCSW	<i>Require PCSW controls within jurisdiction on both public and private developments</i>	H	G
P2GH	<i>Municipal Facility & Structural Stormwater Control Inventory</i>	G	G

SWMP Priority Actions for Total Maximum Daily Load (TMDL) Progress

Section*	SWMP Actions for (City of Romulus)	Biota (Flow, sedimentation) TMDL	Bacteria (E.coli) TMDL
P2GH	<i>Regulated Municipal Facility – Assessment of Potential for Pollutant Discharge</i>	G	G
P2GH	<i>Catch basin cleaning</i>	H	M
P2GH	<i>Lot sweeping</i>	M	L
P2GH	<i>Litter collection</i>	G	G
P2GH	<i>Proper Handling & Disposal of Operation and Maintenance Waste</i>	M	L
P2GH	<i>Employee/Contractor Training</i>	G	G
P2GH	<i>Staff Certifications</i>	G	G
P2GH	<i>IDEP Training</i>	G	G
P2GH	<i>Management of publicly-owned, vegetated properties</i>	M	L
Other	<i>Green Street Projects</i>	H	H
Other	<i>Porous Pavement Projects</i>	H	H
Other	<i>Grow Zone Projects</i>	H	M
Other	<i>Streambank Stabilizations</i>	H	L
Other	<i>Culvert/Bridge Replacements</i>	H	H
Other	<i>Detention/Retention Projects</i>	H	H
Other	<i>Increase Floodplain Projects</i>	H	H
Other	<i>Land Acquisition Projects</i>	M	L
Other	<i>Water Efficiency Projects</i>	H	M
Other	<i>Tree Plantings</i>	H	H
Other	<i>Water Harvesting Projects</i>	H	H

* Key:

ERP	Enforcement Response Procedure
PPP	Public Participation Plan
PEP	Public Education Plan
IDEP	Illicit Discharge and Elimination Plan
SESC	Construction Soil Erosion and Sediment Control
PCSW	Post-Construction Stormwater Runoff Program
P2GH	Pollution Prevention and Good Housekeeping

**CITY OF ROMULUS
ORDINANCE NO. _____**

AN ORDINANCE TO AMEND THE CITY OF ROMULUS CODE OF ORDINANCES:
CHAPTER 62, ARTICLE II, SECTION 62, TO ADD DIVISION 4A.

THE CITY OF ROMULUS, WAYNE COUNTY, MICHIGAN HEREBY ORDAINS:

ARTICLE II.

DIVISION 4A. - ILLICIT DISCHARGE AND CONNECTION STORMWATER CONTROL

GENERALLY

Sec. 62-120. - Definitions.

Authorized enforcement agency means the city and his/her authorized representatives, which shall specifically include all inspectors and article enforcement, and any other individual designated by the Mayor of Romulus to enforce this article. Where applicable the terms may also mean the Director of the Michigan Department of Environmental Quality or his/her designated official, and/or the United States EPA Administrator or his/her designated official.

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

City means the City of Romulus.

Clean Water Act means the Federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.), and any subsequent amendments thereto.

Construction activity means activities subject to NPDES construction permits. These include construction projects resulting in land disturbance of five acres or more requiring an issued permit and small construction activities impacting one to five acres of land deemed to operate under a national permit. Such activities include but are not limited to, clearing and grubbing, grading, excavating and demolition.

County means the County of Wayne.

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

Illegal discharge means any direct or indirect non-stormwater discharge to the storm drain system, except as exempted in section 50-161 of this article.

Illicit connections means either of the following: (1) any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the storm drain system including but not limited to, any conveyances which allow any non-stormwater discharge including sewage, process wastewater, and wash water to enter the storm drain system and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by an authorized enforcement agency; or (2) any drain or conveyance connected from a commercial or industrial land use to the storm drain system which has not been documented in plans, maps, or equivalent records and approved by an authorized enforcement agency.

Industrial activity means activities subject to NPDES industrial permits as defined in 40 CFR, Section 122.26 (b)(14).

MS4 means a municipal separate storm sewer system.

National pollutant discharge elimination system (NPDES) stormwater discharge permit means a permit issued by United States Environmental Protection Agency (EPA), or by the State of Michigan under authority delegated pursuant to 33 USC § 1342(b) and codified in the Michigan Natural Resources and Environmental Protection Act Protection at MCL 324.101 et seq, that authorizes the discharge of pollutants to waters of the United States or State of Michigan, whether the permit is applicable on an individual, group, or general area-wide basis.

Non-stormwater discharge means any discharge to the storm drain system that is not composed entirely of stormwater.

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

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

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

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

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

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

Wastewater means any water or other liquid, other than uncontaminated stormwater, discharged from a facility.

Sec. 62-121. - Purpose.

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

- (1) To regulate the contribution of pollutants to the municipal storm sewer system by stormwater discharges by any user.
- (2) To prohibit illicit connections and discharges to the municipal storm sewer system.
- (3) To establish legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance with this article.

ADMINISTRATION

Sec. 62-122. - Applicability.

This article shall apply to all water entering the storm drain system generated on any developed or undeveloped lands unless expressly exempted by an authorized enforcement agency.

Sec. 62-123. - Enforcement, responsibility for administration.

This article shall be enforceable by the city or other authorized enforcement agency.

Sec. 62-124. - Minimum standards.

The standards set forth herein and promulgated pursuant to this article are minimum standards; therefore, this article does not intend, nor imply that compliance by any person will ensure that there will be no contamination, pollution, nor unauthorized discharge of pollutants.

Sec. 62-125. - Discharge prohibitions.

(a) Prohibition of illegal discharges. No person shall discharge or cause to be discharged into the storm drain system or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater. The commencement, conduct or continuance of any illegal discharge to the storm drain system is prohibited except as described as follows:

- (1) Discharges from footing drains (not including active groundwater dewatering systems), crawl space pumps, air conditioning condensation, springs, noncommercial washing of

vehicles, natural riparian habitat or wetland flows, swimming pools (if dechlorinated - typically less than one PPM chlorine), firefighting activities.

(2) Discharges specified in writing by the city as being necessary to protect public health and safety.

(3) Dye testing is an allowable discharge, but requires a verbal notification to the city prior to the time of the test.

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

(b) *Exempt discharges.* The following discharges are exempt from the discharge prohibitions established by this article: [Firefighting discharges](#), [wWater line flushing](#) or other potable water sources, landscape irrigation or lawn watering, diverted stream flows, rising groundwater, groundwater infiltration to storm drains, uncontaminated pumped groundwater, foundation or and any other water source not containing pollutants.

(c) *Prohibition of illicit connections.*

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

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

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

Sec. 62-126. - Suspension of storm sewer system access.

(a) *Suspension due to illicit discharges in emergency situations.* The city or other authorized enforcement agency may, without prior notice, suspend storm sewer system discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the storm sewer system or the waters of the United States or State of Michigan. If the violator fails to comply with a suspension order issued in an emergency, the authorized enforcement agency may take such steps as deemed necessary to prevent or minimize damage to the storm sewer system or waters of the United States or State of Michigan, or to minimize danger to persons.

(b) *Suspension due to the detection of illicit discharge.* Any person discharging to the storm sewer system in violation of this article may have their storm sewer system access terminated if such termination would abate or reduce an illicit discharge. The city will notify a violator of the proposed termination of its storm sewer system access. The violator may petition the city for reconsideration and hearing.

(c) *Violation.* A person violates this article if the person reinstates storm sewer system access to premises terminated pursuant to this section, without the prior approval of the city or other authorized enforcement agency.

Sec. 62-127 - Industrial or construction activity discharges.

Any person subject to an industrial or construction activity NPDES stormwater discharge permit shall comply with all provisions of such permit. Proof of compliance with said permit may be required in a form acceptable to the city or other authorized enforcement agency prior to the allowing of discharges to the storm sewer system.

Sec. 62-128. - Monitoring of discharges.

(a) *Applicability.* This section applies to all facilities that have stormwater discharges associated with industrial activity, including construction activity.

(b) *Access to facilities.*

(1) The city and/or representatives of the authorized enforcement agency shall be permitted to enter and inspect facilities subject to regulation under this article as often as may be necessary to determine compliance with this article. If a discharger has security measures in force which require proper identification and clearance before entry into its premises, the discharger shall make the necessary arrangements to allow access to the city or representatives of the authorized enforcement agency.

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

(3) The city and/or representatives of the authorized enforcement agency shall have the right to set up on any permitted facility such devices as are necessary in the opinion of the city or authorized enforcement agency to conduct monitoring and/or sampling of the facility's stormwater discharge.

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

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

(6) Unreasonable delays in allowing the city and/or representatives of the authorized enforcement agency access to a permitted facility is a violation of a stormwater discharge permit and of this article. A person who is the operator of a facility with a NPDES permit to discharge stormwater associated with industrial activity violated this article if the person denies the city or authorized enforcement agency reasonable access to the

permitted facility for the purpose of conducting any activity authorized or required by this article.

- (7) If the city and/or representatives of the authorized enforcement agency has been refused access to any part of the premises from which stormwater is discharged, and he/she is able to demonstrate probable cause to believe that there may be a violation of this article, or that there is a need to inspect and/or sample as part of a routine inspection and sampling program designed to verify compliance with this article or any order issued hereunder, or to protect the overall public health, safety and welfare of the community, then the city and/or authorized enforcement agency may seek issuance of a search warrant from any court of competent jurisdiction.

Sec. 62-129. - Requirement to prevent, control, and reduce stormwater pollutants by the use of best management practices.

The city shall adopt requirements identifying best management practices for any activity, operation or facility which may cause or contribute to pollution or contamination of stormwater, the storm drain system, or waters of the United States or State of Michigan. The owner or operator of a commercial or industrial establishment shall provide, at their own expense, reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses through the use of these structural and nonstructural BMPs. Further, any person responsible for a property or premises, which is, or may be, the source of an illicit discharge, may be required to implement, at said person's expense, additional structural and nonstructural BMPs to prevent the further discharge of pollutants to the storm sewer system. Compliance with all terms and conditions of a valid NPDES permit authorizing the discharge of stormwater associated with industrial activity, to the extent practicable, shall be deemed compliance with the provisions of this section. These BMPs shall be part of a stormwater pollution prevention plan (SWPP) as necessary for compliance with requirements of the NPDES permit.

Sec. 62-130. - Watercourse protection.

Every person owning property through which a watercourse passes, or such person's lessee(s), shall keep and maintain that part of the watercourse within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse. This responsibility does not apply to publicly or privately-owned drains that are not owned by the property owner and are otherwise the responsibility of the drain owner. In addition, the owner or lessee shall maintain existing privately-owned structures within or adjacent to a watercourse, so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse.

Sec. 62-131. - Notification of release or discharge.

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into stormwater, the storm drain system, or water of the United States or State of Michigan said person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch

services. In the event of a release of nonhazardous materials, said person shall notify the authorized enforcement agency in person or by phone or facsimile no later than the next business day. Notifications in person or by phone shall be confirmed by written notice addressed and mailed to the city within three business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least three years.

ENFORCEMENT

Sec. 62-132. - Notice of violation.

- (a) Whenever the city or authorized enforcement agency finds that a person has violated a prohibition or failed to meet a requirement of this article, the city or other authorized enforcement agency may order compliance by written notice of violation to the responsible person. Such notice may require without limitation:
- (1) The performance of monitoring, analyses and reporting;
 - (2) The elimination of illicit connections or discharges;
 - (3) That violating discharges, practices, or operations shall cease and desist;
 - (4) The abatement or remediation of stormwater pollution or contamination hazards and the restoration of any affected property;
 - (5) Payment of a fine to cover administrative and remediation costs; and
 - (6) The implementation of source control or treatment BMPs.
- (b) If abatement of a violation and/or restoration of affected property are required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said notice shall further advise that, should the violator fail to remediate or restore within the established deadline, the work will be done by the city or the authorized enforcement agency or a contractor and the expense thereof shall be charged to the violator.

Sec. 62-133. - Appeal of notice of violation.

Any person receiving a notice of violation may appeal the determination of the city to the mayor. The notice of appeal must be received by the mayor's office within seven days from the date of the notice of violation. A hearing on the appeal before the mayor or his/her designee shall take place within 15 days from the date of receipt of the notice of appeal. The decision of the mayor or designee shall be final.

Sec. 62-134. - Enforcement measures after appeal.

If the violation has not been corrected pursuant to the requirements set forth in the notice of violation, or, in the event of an appeal, within 15 days of the denial of an the appeal, then representatives of the city or authorized enforcement agency shall enter upon the subject private property and are authorized to take any and all measures necessary to abate the violation and/or restore the property. It shall be unlawful for any person, owner, agent or person in possession of

any premises to refuse to allow the government agency or designated contractor to enter upon the premises for the purposes set forth above.

Sec. 62-135. - Cost of abatement of the violation.

(a) Within 30 days after abatement of the violation, the owner of the property will be notified of the cost of abatement, including administrative costs. The property owner may file a written protest objecting to the amount of the assessment within 15 days. If the amount due is not paid within 60 days or by the expiration of the time in which to file an appeal, the charges shall become a special assessment against the property and shall constitute a lien on the property for the amount of the assessment.

(b) Any person violating any of the provisions of this article shall become liable to the city for the cost of the abatement by reason of such violation. The liability shall be paid in not more than 12 equal payments. Interest at the legal rate then applicable shall be assessed on a per annum basis on the balance beginning on the first day following discovery of the violation.

Sec. 62-136. - Injunctive relief.

It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this article. If a person has violated or continues to violate the provisions of this article, the city or authorized enforcement agency may petition for a preliminary or permanent injunction restraining the person from activities which would create further violations or compelling the person to perform abatement or remediation of the violation.

Sec. 62-136(a). - Compensatory action.

In lieu of bringing enforcement proceedings to seek the penalties and remedies authorized by this article, the city or authorized enforcement agency may impose alternative compensatory actions upon a violator, such as storm drain stenciling, attendance at compliance workshops, creek cleanup, etc. The decision to seek alternative compensatory actions does not waive the city or authorized enforcement agency's right to seek legal enforcement from a court of law.

Sec. 62-136(b). - Violations deemed a public nuisance.

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

Sec. 62-136(c). - Criminal prosecution.

(a) All violations of this article shall be municipal civil infractions and upon a determination of responsibility therefor shall be punishable by a civil fine of not more than \$500.00.

(b) The authorized enforcement agency may recover all attorney fees court costs and other expenses associated with enforcement of this article, including sampling and monitoring expenses.

Sec. 62-136(d). - Remedies not exclusive.

The remedies listed in this article are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of the authorized enforcement agency to seek cumulative remedies.

ADOPTED, APPROVED, AND PASSED by the City Council of the City of Romulus this _____ day of _____, 2019.

LEROY BURCROFF, Mayor

ELLEN L. CRAIG- BRAGG, CMC, City Clerk

I hereby certify that the foregoing is a true copy of the Ordinance as passed by the City Council of the City of Romulus at a regular Council Meeting held in the City Council Room in said City on the _____ day of _____, 2019.

ELLEN L. CRAIG-BRAGG, CMC, City Clerk

I further certify that the foregoing was published in _____, a newspaper of general circulation in the City of Romulus, on the _____ day of _____, 2019.

ELLEN L. CRAIG-BRAGG, CMC, City Clerk






Within forty-five (45) days after publication of any ordinance duly passed by the Council, a petition may be presented to the Council protesting against such ordinance continuing in effect. Said petition shall contain the text of such ordinance and shall be signed by not less than six percent (6%) of the registered electors registered at the last preceding election at which a Mayor of the City was elected. Said ordinance shall thereupon and thereby be suspended from operation and the Council shall immediately reconsider such ordinance.

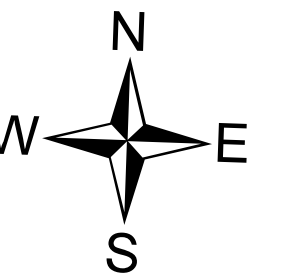
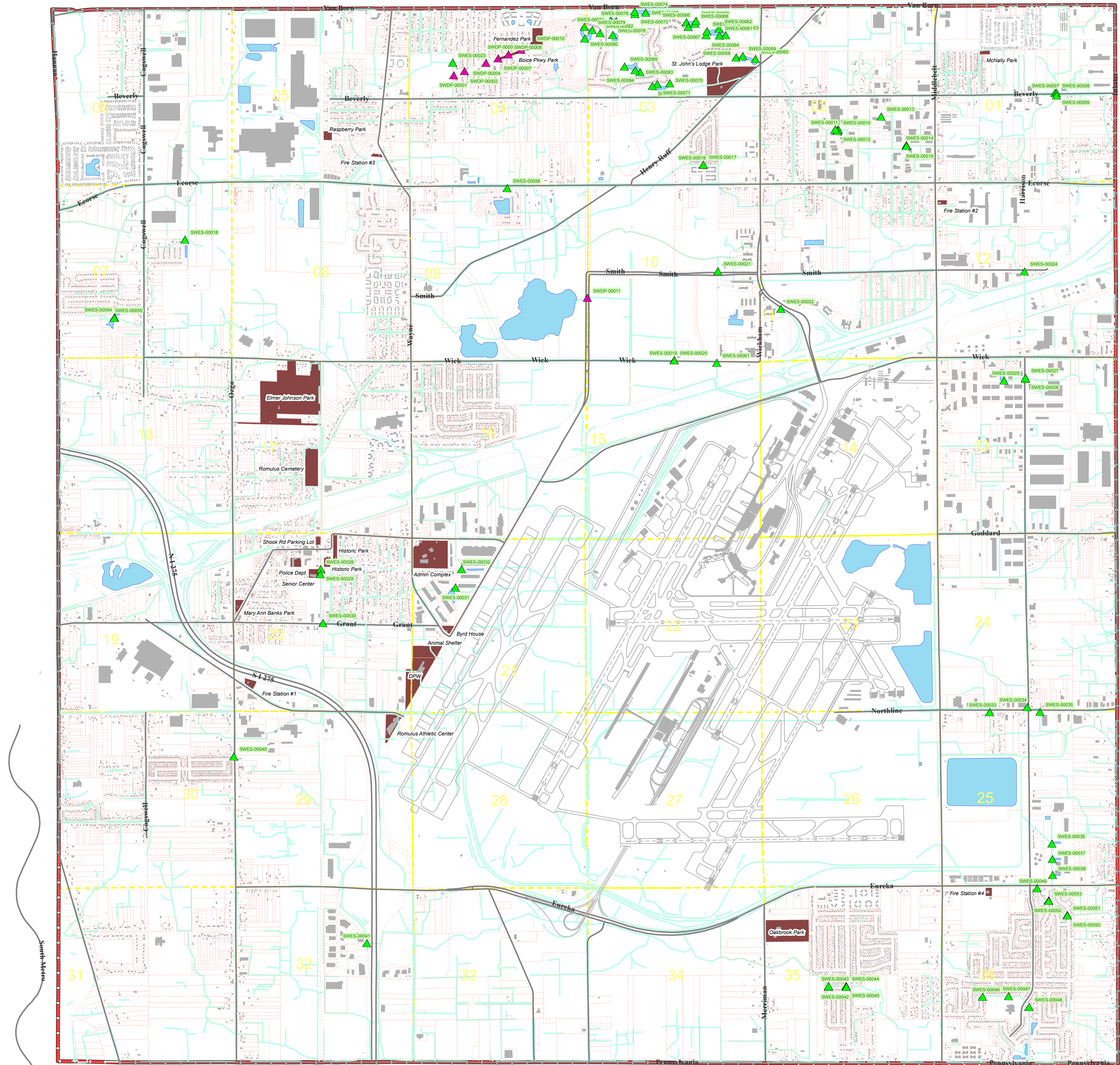
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SWDP-00004	1/18/1972	BOICE ENCLOSED DRAIN	18"	STOF-04-140	Discharge Point
SWDP-00007	1/18/1972	BOICE ENCLOSED DRAIN	30"	STOF-04-150	Discharge Point
SWDP-00008	1/18/1972	BOICE ENCLOSED DRAIN	30"	STOF-04-160	Discharge Point
SWDP-00009	1/18/1972	BOICE ENCLOSED DRAIN	36"	STOF-04-170	Discharge Point
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SWES-00062	<Null>	Black Creek (via det pond)	<Null>		STOF-03-111	Outfall
SWES-00063	<Null>	Black Creek (via det pond)	<Null>		STOF-03-110	Outfall
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SWES-00070	<Null>	Black Creek (via det pond)	<Null>		STOF-03-142	Outfall
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SWES-00073	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-151	Outfall
SWES-00074	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-152	Outfall
SWES-00075	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-150	Outfall
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SWES-00079	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-171	Outfall
SWES-00080	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-173	Outfall
SWES-00081	<Null>	Crocker Drain (via det pond)	<Null>		STOF-03-172	Outfall
SWES-00082	<Null>	Crocker Drain	<Null>		STOF-03-170	Outfall
SWES-00083	<Null>	Black Creek (via det pond)	<Null>		STOF-03-182	Outfall
SWES-00084	<Null>	Black Creek (via det pond)	<Null>		STOF-03-181	Outfall
SWES-00085	<Null>	Black Creek (via det pond)	<Null>		STOF-03-180	Outfall

Outfall & Facility Inventory

- City of Romulus -

-  Discharge Points
-  Outfalls
-  City Facilities
-  Storm Detention Areas
-  Road Centerlines
-  Building Footprints
-  TaxParcel
-  Storm Open Drains
-  Municipal Boundaries
-  Sections



DEPARTMENT OF ENVIRONMENTAL QUALITY

WATER RESOURCE DIVISION

PART 17. SOIL EROSION AND SEDIMENTATION CONTROL

(By authority conferred on the department of environmental quality by sections 9104 and 9114 of 1994 PA 451, MCL 324.9104 and 324.9114)

PART 17. SOIL EROSION AND SEDIMENTATION CONTROL

R 323.1701 Definitions.

Rule 1701. (1) As used in this part:

(a) "Accelerated soil erosion" means the increased loss of the land surface that occurs as a result of human activities.

(b) "Acceptable erosion and sediment control program" means the activities of a county or local enforcing agency or authorized public agency that are conducted in accordance with these rules and part 91 regarding staff training, developing and reviewing plans, issuing permits, conducting inspections, and initiating compliance and enforcement actions to effectively minimize erosion and off-site sedimentation.

(c) "Designated agent" means a person who has written authorization from the landowner to sign the application and secure a permit in the landowner's name.

(d) "Lake" means the Great Lakes and all natural and artificial inland lakes or impoundments that have definite banks, a bed, visible evidence of a continued occurrence of water, and a surface area of water that is equal to, or greater than, 1 acre. "Lake" does not include sediment basins and basins constructed for the sole purpose of storm water retention, cooling water, or treating polluted water.

(e) "Landowner" means a person who fulfills 1 or more of the following requirements:

(i) The person owns or holds a recorded easement on the property.

(ii) The person is engaged in construction in a public right-of-way in accordance with sections 13, 14, 15, and 16 of 1925 PA 368, MCL 247.183, 247.184, 247.185, and 247.186.

(iii) The person is engaged in a project that meets all of the following conditions:

(A) The project is related to 1 or more roads, highways, sidewalks, trails, driveways, parking areas, forms of public transit, forms of nonmotorized transportation, or boating, including all structures, improvements, features, and lands related to the project.

(B) One or more state agency or local unit of government owns, exercises jurisdiction over, or holds a recorded easement on the property in the area where the earth change will occur.

(C) All state agencies or local units of government that own, exercises jurisdiction over, or have a recorded easement on the property in the area where the earth change will

occur grant a permit or written authorization to the person that specifies where the earth change is allowed to occur.

(D) No state agency or local unit of government that owns, exercises jurisdiction over, or holds a recorded easement in the area where the earth change will occur has control over the project during construction. The control prohibited by this subparagraph includes, but is not limited to, paying for or having a financial interest in the project during construction or directing contractors and other individuals engaged in construction work. The control prohibited by this subparagraph does not consist solely of establishing construction requirements or conducting inspections.

(f) "Nonerosive velocity" means a speed of water movement that is not conducive to the development of accelerated soil erosion.

(g) "Part 91" means part 91 of 1994 PA 451, MCL 324.9101 to 324.9123.

(h) "Sediment basin" means a naturally occurring or constructed depression used for the sole purpose of capturing sediment during or after an earth change activity.

(i) "Stabilization" means the establishment of vegetation or the proper placement, grading, or covering of soil to ensure its resistance to soil erosion, sliding, or other earth movement.

(j) "Storm water retention basin" means an area that is constructed to capture surface water runoff and that does not discharge directly to a lake or stream through an outlet. Water leaves the basin by infiltration and evaporation.

(k) "Stream" means a river, creek, or other surface watercourse that may or may not be serving as a drain as defined in 1956 PA 40, MCLs 280.1 to 280.630, and which has definite banks, a bed, and visible evidence of the continued flow or continued occurrence of water, including the connecting waters of the Great Lakes.

(l) "Temporary soil erosion and sedimentation control measures" means interim control measures that are installed or constructed to control soil erosion and sedimentation and that are not maintained after project completion.

(m) "Permanent soil erosion and sedimentation control measures" means control measures that are installed or constructed to control soil erosion and sedimentation and that are maintained after project completion.

(2) The terms defined in part 91 have the same meanings when used in these rules.

History: 1979 AC; 1998 AACS; 2017 AACS.

R 323.1702 Earth change requirements generally.

Rule 1702. (1) A person shall conduct an earth change in a manner that will effectively reduce accelerated soil erosion and resulting sedimentation.

(2) A person engaged in an earth change identified in R 323.1704 shall plan, implement, and maintain acceptable soil erosion and sedimentation control measures in conformance with part 91, which effectively reduce accelerated soil erosion and off-site sedimentation.

(3) A person shall set forth soil erosion and sedimentation control measures in a plan as prescribed by R 323.1703. A person shall make the plan available for inspection at all times at the site of the earth change. The department, or its designated representative, may require the county or local enforcing agency to file a copy of the plan with the department.

(4) A person shall obtain a permit containing state prescribed information, as required by R 323.1707, and make the permit available for inspection at the site of the earth change.

History: 1979 AC; 1998 AACCS.

R 323.1703 Soil erosion and sedimentation control plan requirements.

Rule 1703. A person shall prepare a soil erosion and sedimentation control plan for any earth change identified in R 323.1704. A person shall design the plan to effectively reduce accelerated soil erosion and sedimentation and shall identify factors that may contribute to soil erosion or sedimentation, or both. The plan shall include, but not be limited to, all of the following:

(a) A map or maps at a scale of not more than 200 feet to the inch or as otherwise determined by the county or local enforcing agency. A map shall include a legal description and site location sketch that includes the proximity of any proposed earth change to lakes or streams, or both; predominant land features; and contour intervals or slope description.

(b) A soils survey or a written description of the soil types of the exposed land area contemplated for the earth change.

(c) Details for proposed earth changes, including all of the following:

(i) A description and the location of the physical limits of each proposed earth change.

(ii) A description and the location of all existing and proposed on-site drainage and dewatering facilities.

(iii) The timing and sequence of each proposed earth change.

(iv) The location and description for installing and removing all proposed temporary soil erosion and sediment control measures.

(v) A description and the location of all proposed permanent soil erosion and sediment control measures.

(vi) A program proposal for the continued maintenance of all permanent soil erosion and sediment control measures that remain after project completion, including the designation of the person responsible for the maintenance. Maintenance responsibilities shall become a part of any sales or exchange agreement for the land on which the permanent soil erosion control measures are located.

History: 1979 AC; 1998 AACCS.

R 323.1704 Permit requirements.

Rule 1704. (1) A landowner or designated agent who contracts for, allows, or engages in, an earth change in this state shall obtain a permit from the appropriate enforcing agency before commencing an earth change which disturbs 1 or more acres of land or which is within 500 feet of the water's edge of a lake or stream, unless exempted in R 323.1705.

(2) An earth change activity that does not require a permit under subrule (1) of this rule is not exempt from enforcement procedures under part 91 or these rules, if the

activity exempted by subrule (1) of this rule causes or results in a violation of part 91 or these rules.

History: 1979 AC; 1998 AACCS.

R 323.1705 Permit exemptions and waivers.

Rule 1705. (1) A permit is not required for any of the following:

(a) A beach nourishment project permitted under part 325 of Act No. 451 of the Public Acts of 1994, as amended, being § 324.32501 et seq. of the Michigan Compiled Laws.

(b) Normal road and driveway maintenance, such as grading or leveling, that does not increase the width or length of the road or driveway and that will not contribute sediment to lakes or streams.

(c) An earth change of a minor nature that is stabilized within 24 hours of the initial earth disturbance and that will not contribute sediment to lakes or streams.

(d) Installation of oil, gas, and mineral wells under permit from the supervisor of wells if the owner-operator is found by the supervisor of wells to be in compliance with the conditions of part 91.

(2) A county or local enforcing agency may grant a permit waiver for an earth change after receiving a signed affidavit from the landowner stating that the earth change will disturb less than 225 square feet and that the earth change will not contribute sediment to lakes or streams.

(3) Exemptions provided in subrules (1) and (2) of this rule shall not be construed as exemptions from enforcement procedures under part 91 or these rules, if the activities exempted by subrules (1) and (2) cause or result in a violation of part 91 or these rules.

History: 1979 AC; 1998 AACCS.

R 323.1706 Application for permit.

Rule 1706. (1) A landowner or designated agent shall submit an application for a permit to the appropriate enforcing agency.

(2) A landowner or designated agent shall submit, with the application, a soil erosion and sedimentation control plan and any other document that the appropriate enforcing agency may require.

(3) The county or local enforcing agency shall provide an application requiring state prescribed information to an applicant.

(4) An authorized public agency is exempt from obtaining a permit from a county or local enforcing agency, but shall notify the county or local enforcing agency of each proposed earth change.

History: 1979 AC; 1998 AACCS.

R 323.1707 Application review and permit procedures.

Rule 1707. (1) A person who is designated by the county or local enforcing agency who is trained in soil erosion and sedimentation control methods and techniques shall review and approve a soil erosion and sedimentation control plan.

(2) The appropriate enforcing agency shall approve, disapprove, or require modification of an application for an earth change permit within 30 calendar days following receipt of the application. The enforcing agency shall notify an applicant of by first-class mail. If an applicant is disapproved, then the enforcing agency shall advise the applicant by certified mail of its reasons for disapproval and conditions required for approval. The enforcing agency need not notify an applicant of approval or disapproval by mail if the applicant is given written approval or disapproval of the application in person. A permit given to the applicant either in person or by first-class mail constitutes approval.

(3) A permit that contains state prescribed information shall be used by each county or local enforcing agency and shall include any additional provisions required by the county or local enforcing agency. The permit shall be available at the site of the earth change for inspection.

(4) Upon a determination that a permit applicant has met all of the requirements of these rules, Part 91 and the local ordinance, if applicable, the appropriate enforcing agency shall issue a permit for the proposed earth change.

History: 1979 AC; 1998 AACCS; 2007 AACCS.

R 323.1708 Soil erosion and sedimentation control procedures and measures generally.

Rule 1708. A person who applies for an earth change permit shall incorporate the soil erosion and sedimentation control procedures and measures prescribed by R 323.1709 and R 323.1710 into the soil erosion and sedimentation control plan and shall apply the procedures and measures to all earth changes identified in the plan, unless the person preparing the plan shows, to the satisfaction of the appropriate enforcing agency, that altering the control procedures or measures or including other control procedures or measures will prevent accelerated soil erosion and sedimentation during the earth change.

History: 1979 AC; 1998 AACCS.

R 323.1709 Earth change requirements: time; sediment removal; design, installation, and removal of temporary or permanent control measures.

Rule 1709. (1) A person shall design, construct, and complete an earth change in a manner that limits the exposed area of any disturbed land for the shortest possible period of time as determined by the county or local enforcing agency.

(2) A person shall remove sediment caused by accelerated soil erosion from runoff water before it leaves the site of the earth change.

(3) A person shall design a temporary or permanent control measure that is designed and constructed for the conveyance of water around, through, or from the earth change area to limit the water flow to a nonerosive velocity.

(4) A person shall install temporary soil erosion and sedimentation control measures before or upon commencement of the earth change activity and shall maintain the measures on a daily basis. A person shall remove temporary soil erosion and sedimentation control measures after permanent soil erosion measures are in place and the area is stabilized. A person shall stabilize the area with permanent soil erosion control measures under approved standards and specifications as prescribed by R 323.1710.

(5) A person shall complete permanent soil erosion control measures for all slopes, channels, ditches, or any disturbed land area within 5 calendar days after final grading or the final earth change has been completed. If it is not possible to permanently stabilize a disturbed area after an earth change has been completed or if significant earth change activity ceases, then a person shall maintain temporary soil erosion and sedimentation control measures until permanent soil erosion control measures are in place and the area is stabilized.

History: 1979 AC; 1998 AACs.

R 323.1710 Standards and specifications.

Rule 1710. A person shall complete all temporary and permanent erosion and sedimentation control measures according to the approved plan or operating procedures.

(1) A person shall install and maintain control measures in accordance with the standards and specifications of all of the following:

- (a) The product manufacturer.
- (b) The local conservation district.
- (c) The department.
- (d) The Michigan department of transportation.
- (e) The enforcing agency, if applicable and formally adopted.

(2) If a conflict exists between the standards and specifications, then the enforcing agency or authorized public agency shall determine which specifications are appropriate for the project.

History: 1979 AC; 1998 AACs.

R 323.1711 Building permits.

Rule 1711. (1) A local agency or general law township that issues building permits shall notify the county or local enforcing agency immediately upon receipt of an application for a building permit that requires an earth change which disturbs 1 or more acres or which is located within 500 feet of a lake or stream.

(2) A local agency or general law township shall not issue a building permit to a person engaged in an earth change if the change requires a permit under part 91 or these rules until the county or local enforcing agency has issued the required state-prescribed permit for the earth change.

History: 1979 AC; 1998 AACs.

R 323.1712 Enforcement.

Rule 1712. The county or local enforcing agency may issue a cease and desist order or revoke a permit upon its finding that there is a violation of part 91, these rules, or an approved local ordinance or a finding that there is a violation of a permit or an approved soil erosion and sedimentation control plan.

History: 1979 AC; 1998 AACS.

R 323.1713 Periodic review.

Rule 1713. The department shall conduct an ongoing comprehensive review and evaluation of all soil erosion and sedimentation control programs that operate under part 91 and these rules. The department shall notify county and local enforcing agencies and authorized public agencies as to the acceptability of their soil erosion and sedimentation control programs. The department shall make available a report of its findings of the review and evaluation of all enforcing agencies and authorized public agencies.

History: 1979 AC; 1998 AACS.

R 323.1714 Availability of documents.

Rule 1714. Copies of the local conservation district standards and specifications for soil erosion and sedimentation control, as referred to in R 323.1710, are available at each local conservation district office at a nominal cost. Copies of the department's standards are available from the water resources division's Lansing office. Department of transportation standards are available at the Lansing office for a fee. Information on other standards may be available from product manufacturers and the enforcing agencies.

History: 1979 AC; 1998 AACS; 2017 AACS.

City of Romulus
Department of Public Works Facility

MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY
PART 5 RULES

Pollution Incident Prevention Plan

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Chapter 1: General Facility Information

Table 1: General Facility Information

NAME OF FACILITY:	City of Romulus Department of Public Works
FACILITY ADDRESS:	12600 Wayne Road
FACILITY CONTACT INFORMATION	
Name and Title:	Roberto J. Scappaticci, Director of Department of Public Works
Mailing Address:	12600 Wayne Road
Telephone:	734-955-8752
Email:	rscappaticci@romulusgov.com
SPILL PREVENTION AND CONTROL COORDINATOR	
Name and title:	Kathryn Hood, Assistant Director of Department of Public Works
Telephone:	734-955-8755
Email:	khood@romulusgov.com
24-Hour Emergency Telephone:	911

Chapter 2: Spill Response Team

The City of Romulus DPW Maintenance Garage houses vehicles and materials for vehicle road maintenance and outdoor storage piles of aggregate materials. The facility also stores road salt quantities that require the development of a Pollution Incident Prevention Plan (PIPP). The City of Romulus DPW staff identified to assist in pollution incident prevention activities are as follows:

Table 2: Spill Response Team

NAME AND TITLE	RESPONSIBILITY
Roberto J. Scappaticci, Public Works Director	Spill Response Program Oversight
Kathryn Hood, Assistant Public Works Director	Onsite spill prevention and control, Surveillance and monitoring activities

Chapter 3: Site Map

The City of Romulus DPW Facility consists of the following buildings and storage areas and are labeled on Site Map #1:

1. DPW Maintenance Garage
2. DPW Office Building
3. Aluminum Cold Storage Building
4. Salt Dome
5. Fueling Station
6. Aggregate Storage Area
7. Shed

All vehicle and equipment maintenance on the City's 100-vehicle fleet is performed indoors inside the DPW Maintenance Garage (1), which has interior floor drains that lead to the sanitary sewer. Vehicle fluids, tools, and parts are all stored inside this garage. Vehicles are stored inside a majority of the time, or outside in the asphalt parking lot for temporary storage.

The DPW Office building (2) is used as office space for the DPW Director and Administrative staff and no materials are stored here.

The Aluminum Cold Storage Building (3) has a concrete floor without any interior floor drains. This building stores pallets of bagged ice melt, tools, equipment, and vehicles as necessary. No maintenance is performed inside this building.

The Salt Dome (4) has 5,000 cubic yard capacity for salt and has a concrete floor without any floor drains. The onsite PIPP details the construction of this facility.

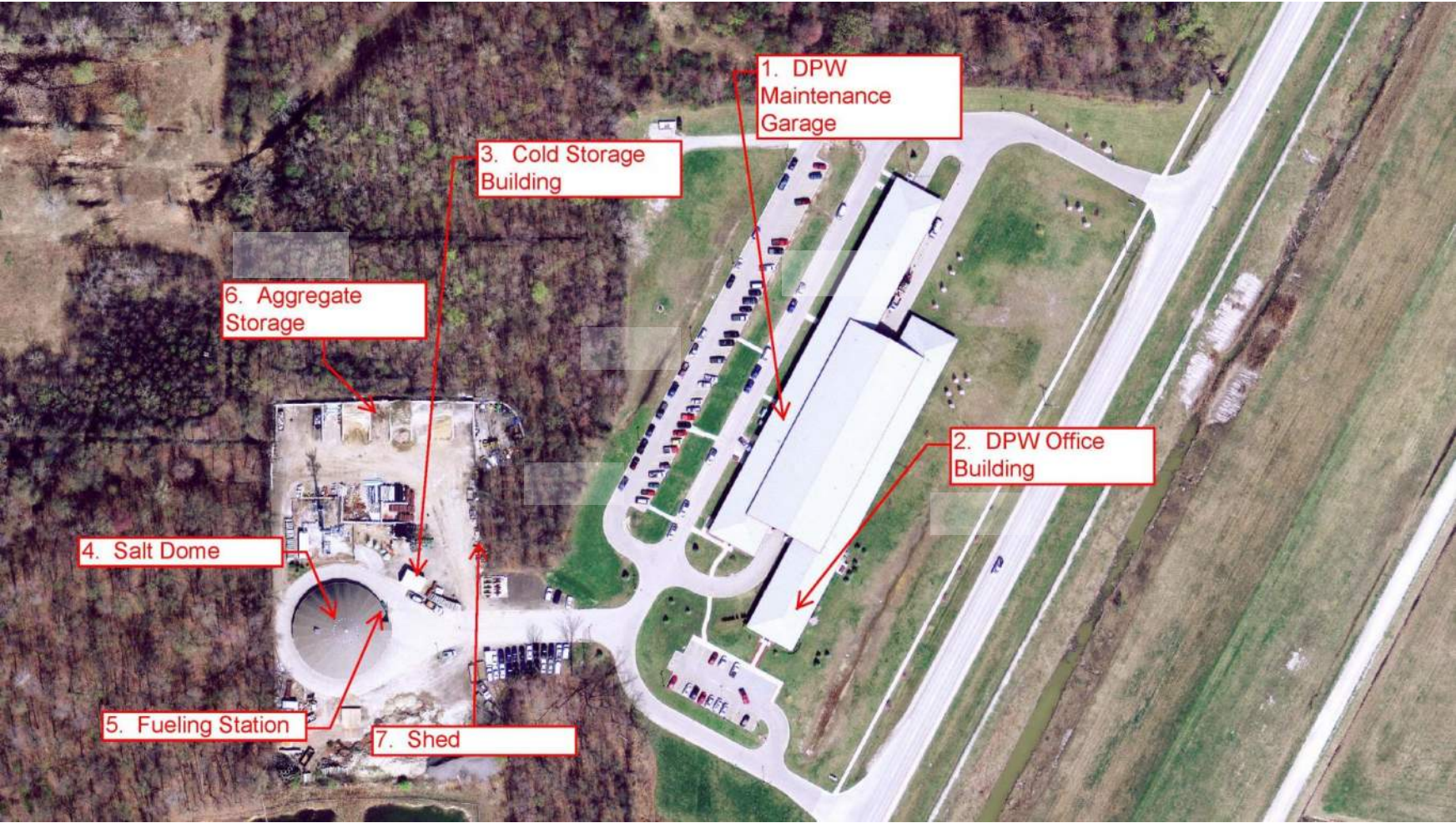
The Fueling Station (5) consists of 1 aboveground storage tanks: 1,000-gallon diesel. The system has leak detection devices with alarms and a well-labeled emergency stop button. There are pumps that have automatic shutoff valves and breakaway hoses to prevent leaks and spills.

The Aggregate Storage Area (6) consists of storage of small aggregate piles for materials as needed. These materials consist of sand, gravel, 21AA, limestone, landscape stone, water main break and excavated soil. Sizes of these piles range from approximately 5-25 yards.

A small Shed (7) is located adjacent to the aggregate piles. The Shed has a raised floor that stores water main parts and traffic control signs.

The two onsite catch basins and drainage lines have been identified and are labeled on the site map, indicating that all stormwater runoff either infiltrates into the pervious gravel areas or discharges to the road ditches.

City of Romulus DPW Facility Site Map #1



Chapter 4: Significant Material Inventory

Inventory and Description of Significant Materials

To identify potential sources of significant materials, City staff, conducted an inventory of municipal buildings, activities and materials that may be identified as polluting materials under Part 5 at the City of Romulus DPW Facility. The MSDS for all materials are located inside the DPW Maintenance Office. The polluting materials stored onsite requiring a PIPP include the following:

Material Name	Quantity Stored	Location	Priority
Salt in aggregate, solid from	5000 ton capacity	Salt Dome	High
Diesel Fuel	1000 gallon	DPW Yard (next to salt dome)	Medium
21AA and 22AA gravel	1300 square yards	Stockpile area	Low
Mulch	1300 square yards	Stockpile area	Low
Sand	1300 square yards	Stockpile area	Low
Top Soil	1300 square yards	Stockpile area	Low
Crushed Limestone	1300 square yards	Stockpile area	Low
Dumpsters	Two 50 square yarders	Stockpile area	Low

Salt Storage Description

The City of Romulus DPW Facility stores road salt inside a covered Salt Dome on the DPW property. The dome has a shingled roof, concrete floor, with wooden slot walls. The capacity of the dome is 5000 tons. There are no interior floor drains inside the dome.

Salt is delivered to the DPW Facility and is placed directly in the dome. A staff person is present onsite during all salt deliveries to direct where and how the salt is delivered. No loads of salt are placed near storm drains or left uncovered. Employees are trained in the procedure to immediately sweep excess salt from track out or spills back into the dome to prevent stormwater runoff.

Salt is loaded into DPW trucks for usage inside the Salt Dome on the concrete floor. A loader scoops material from inside the dome and loads each of the five salting vehicles as they pull inside the Dome.

And spilled salt material falls onto the concrete floor inside the dome is immediately swept back into the dome pile to prevent exposure to stormwater runoff.

The City of Romulus DPW Maintenance Garage performs onsite maintenance for the vehicles and equipment used in the department, including the loader and dumps trucks used for snow and salt activities. When problems occur, the vehicle drivers indicate the problems to the DPW Maintenance Staff. Maintenance is scheduled on the vehicle immediately. If fluid leaks are present, drip pans are used to catch fluids to prevent spills or releases. These vehicles are washed in a dedicated interior wash bay, where the wash water is discharged directly to the sanitary sewer.

The Salt Dome **is not** located within 50 feet of a lake shore, stream bank, or wetland, nor is it located in a 100-year floodplain.

Fuel Tank

The diesel fuel tank is located on the east side of the salt dome. The tank is double lined and is used to fill our Heavy Equipment.

Stock Pile/Dumpster Area

The stockpile/dumpster area is located on the north side of the salt dome. There are several concrete encased bins which stores materials listed for DPW functions and repairs. On most occasions city staff will pick up the materials and store in the stockpile area. Limestone, sand, and gravel are delivered on an as needed basis. Handling of the materials consists of using an endloader to load dump trucks at the stockpile area for material use out in the field.

The dumpsters are used for the disposal of roadside trash and are emptied on an as needed basis by a contracted trash company. The trash from the dumpsters is taken off-site by the contracted trash company.

Spill Response Procedures and Equipment

If the following materials are released to the environment in the identified quantities, the *Spill Response Plan for Large Spills* will be followed:

To The Ground:		To Waters of the State:		To Sanitary Sewer (contact WWTP only):	
Salt	50 pounds	Salt	Any quantity that causes visible sheens, oil films, unnatural turbidity, foams or deposits in water body	Salt	Any quantity not currently authorized by receiving WWTP

A Spill Response Plan for different size spills and a Spill Response Form have been created for the City of Romulus DPW Facility and are located in **Appendix C**.

Chapter 5: Routine Inspections

Preventive maintenance at the DPW Facility involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. A Routine Inspection Form has been created for the City of Romulus DPW Facility and is located in **Appendix A**. The Routine Inspection Form will be used by facility staff during site walk-throughs that will be conducted on a **monthly** basis to observe the salt storage areas. The purpose of these inspections is to identify and prevent conditions that could lead to the release of polluting materials to sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater's of this state. Good housekeeping procedures reduce the potential for pollutants to come into contact with the environment.

Chapter 6: Three-Year Plan Review

The completed PIPP requires that City of Romulus will notify the DEQ Water Bureau District Office within 30 days at:

SE Michigan District Office
27700 Donald CT
Warren MI 48092-2793
(586) 753-3700

City of Romulus will also notify the following agencies that the PIPP requirements have been completed:

- Wayne County Public Health Department:
Health Administration Building
33030 Van Born
Wayne, MI 48184
(734) 727-7000
- Local Emergency Planning Committee:
10250 Middlebelt
Detroit MI 48242
734-942-5289

Part 5 requires that the PIPP be evaluated every three years and after any release requiring implementation of the plan. The Plan will also be updated if any facility personnel, processes, materials, or procedures that were included in the plan change (See **Appendix B** for PIPP Review Form).

Based on the three-year review, the City of Romulus DPW Facility will amend the PIPP as needed to ensure continued compliance with the terms and conditions of Part 5. Recertification and re-notification of updates need to be sent to the MDNRE District Office, the Wayne County Health Department, and the Local Emergency Planning Committee.

City of Romulus DPW Facility will maintain records of all PIPP-related inspections and activities, including Routine Inspections, Three-Year Review, and Spill Reports. Records will also be kept describing other illicit discharges that can affect the quality of stormwater runoff. All such records will be retained for three years.

Appendix A: PIPP Routine Inspection Form

Date:	Facility Name:
Inspector Name:	Training: Yes _____ No _____
Routine Inspection Schedule: Monthly	

Salt Storage Area and Fuel Tank

Check Box	Method	Comment/Action Taken
<input type="checkbox"/>	Inspect roof of Salt Barn for holes and loose shingles. <i>(If defects are detected, schedule roof for necessary repairs.)</i>	
<input type="checkbox"/>	Inspect the outside of the Salt Barn to look for seepage of salt outside of the structure. Inspect joints between the floor and the walls, between the boards, the roof and the walls, and all areas of the ground. <i>(If material is detected, clean up salt immediately and schedule barn for necessary repairs.)</i>	
<input type="checkbox"/>	Inspect loading area for presence of salt. Ensure the approach area is swept regularly to contain trackout, and salt is returned for reuse <i>(don't hose down the area)</i>	
<input type="checkbox"/>	During salt deliveries, ensure staff is present to prevent salt from entering storm drains and to immediately load salt into barn. <i>Do not allow deliveries to stand outside of the barn uncovered.</i>	
<input type="checkbox"/>	Perform an inspection of the loading equipment. Check for leaks, loose connections, and proper operation.	
<input type="checkbox"/>	Ensure equipment and vehicles are washed in designated inside bay where the water goes to the sanitary sewer.	
<input type="checkbox"/>	Inspect Fuel Tank and area for spills and/or leaks	
<input type="checkbox"/>	Inspect Fuel Tank for holes, cracks and any other deficiencies	
<input type="checkbox"/>	Inspect the bowl that the tank sits in for leaks and or cracks	

Appendix B: Three-Year PIPP Review Form

Date of Review:

Reviewer Name	
Print:	Signature:

1) Facility general information and Spill Response Team information is current and accurate	Yes	No
2) Site map is current and accurate	Yes	No
3) Polluting material inventory is current and accurate	Yes	No
4) New exposures, processes and related controls have been documented	Yes	No
5) Spills have been recorded and reported as appropriate	Yes	No
6) Review Routine Inspections to ensure all repairs or actions have been made as necessary	Yes	No
7) Review spill reports (if applicable)	Yes	No
8) Review Spill Response Procedures and phone numbers for updates	Yes	No
10) Ensure Material Safety Data Sheets are up-to-date and available for all chemicals onsite	Yes	No
11) Review Routine Inspections of Catch Basins and Work Orders of cleaning	Yes	No
12) Review Routine Inspections of Non Structural Controls to Assess employee training	Yes	No

Additional Comments:

Appendix C: City of Romulus DPW Facility Spill Response Plan

EMERGENCY NUMBERS (to be posted at key telephones throughout facility)

Agency Name	Phone Number
Local Fire Department	
Emergency	911
Nonemergency	
Police	
Emergency	911
Nonemergency	
Wayne County Environmental Health Department	
Nonemergency	(734) 222-3800
U.S. Coast Guard	
National Response Center	800-424-8802
Michigan Department of Environmental Quality (DEQ)	
8:00 a.m. – 5:00 p.m. Southeast Michigan District Office	(586) 753-3700
After Hours: PEAS Hotline	1-800-292-4706
EMERGENCY SPILL RESPONSE	
To be called for spill response services in the event the City is unable to properly respond, if not the Fire Dept. (i.e., large or hazardous spills)	Western Wayne Hasmat Young's Environmental, 800-496-8647 Terra Contracting, 866-354-8963 Vac-All Emergency Response Group, 734-941-4359 Marine Pollution Control 800-521-8232
Waste Water Treatment Plant	
For spills into the sanitary system, contact the local WWTP	313-267-6000 (DWSD Emergency)

SPILL RESPONSE PLAN - FOR SMALL SPILLS (Less than 5 gallons)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder
2. Stop source of spill (plug hole, upright the container, shut off valve)
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and (nearby electrical equipment). If serious hazards are present leave the area and call 911. When in doubt consult the Material Safety Data Sheets for hazards
4. Notify Supervisor
5. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain)
6. If spilled material has entered a storm sewer, check catch basins and contact Keith Boc at 734-955-8755.
7. Clean up spilled material/absorbent (do not flush with water)
8. Dispose of cleaned material/absorbent into secure container for proper disposal
9. Complete a Spill Reporting Sheet (for internal review purposes)

SPILL RESPONSE EQUIPMENT *[REQUIRED, EDIT AS NECESSARY]*

- 5 lb floor dry
- 1 – Shovel
- 1 - Broom
- 1 – Absorbent Boom
- 5– Absorbent Pads
- Container for clean-up (dustpan, 5-gallon container, etc)

SPILL RESPONSE PLAN - MEDIUM SPILLS (5 < 50 gallons)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder.
2. Stop source of spill (plug hole, upright the container, shut off valve).
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and nearby electrical equipment. If serious hazards are present leave the area and call 911. When in doubt consult the Material Safety Data Sheets for hazards.
4. Contact co-workers and Supervisor for assistance and to make them aware of the spill and potential dangers.
5. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
6. Stop spill from spreading (use absorbent or other material).
7. If spilled material has entered a storm sewer, check catch basins and contact Keith Boc at 734-955-8755.
8. Clean up spilled material/absorbent (do not flush with water) – If outside clean-up service is required contact.
9. Dispose of cleaned material/absorbent into secure container for proper disposal.
10. Complete a Spill Reporting Sheet (for internal review purposes)

SPILL RESPONSE EQUIPMENT [REQUIRED, EDIT AS NECESSARY]

- 20 lb floor dry
- 1 – Shovel
- 1 - Broom
- 2 – Absorbent Booms
- 20 – Absorbent Pads
- Container for clean-up (30 gal)

SPILL RESPONSE PLAN - LARGE SPILLS (Greater than 50 Gallons or 50 pounds)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder
2. Stop source of spill (plug hole, upright the container, shut off valve)
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and nearby electrical equipment. If serious hazards are present leave the area and call 911.
4. Call Keith Boc at 734-955-8755 to make them aware of the spill and potential dangers. Notify police and fire departments if necessary for possible lane closure and need for assistance.
5. **LARGE SPILLS ARE LIKELY TO PRESENT A HAZARD AND WILL REQUIRE SPILL RESPONSE SERVICES FROM ONE OF THE COMPANIES LISTED IN APPENDIX C.**
6. Protect all drains from spilled material (use absorbent or other material as necessary, cover or plug drain)
 - a. A spill kit is located at: Gas Pumps
 - b. The MSDS for salt is kept: City Yards Office
7. Stop spill from spreading (use absorbent or other diking material such as sand, dirt, etc.)
8. For spills of materials indoors, clean up spilled material with absorbents, oil dry, etc. (Do not flush with water). If material is spilled outside, a clean-up service may be required.
9. Spilled salt will be swept up and either transferred to the Salt Barn, or into a truck for road application use. Industry standards will be followed regarding usage concentration and application rates using normally accepted practices.
10. Dispose of cleaned material/absorbent into secure container for proper disposal.
11. A call to the DEQ or PEAS will be made to report the release:

During Regular Business Hours:

SE Michigan District Office
27700 Donald CT
Warren MI 48092-2793
(586) 753-3700

During Non-Business Hours:

Pollution Emergency Alert System (PEAS)
1-800-292-4706

12. A written report **MUST** be submitted within 10 days after the release to:

- a. MDNRE Water Bureau Chief
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

- b. Wayne County Public Health Department:
Health Administration Building
33030 Van Born
Wayne, MI 48184

SPILL RESPONSE EQUIPMENT [*REQUIRED, EDIT AS NECESSARY*]

- 20 lb floor dry
- 1 - Broom
- 1 – Shovel
- Caution Tape
- 5– Absorbent Booms
- 20 – Absorbent Pads
- Sand (100 tons)

Appendix D: SPILL REPORTING SHEET

Date of Incident	
Time of Incident	
Location & Cross Streets	
Type of Spill	
Estimated Quantity	
Reported To	
Time Reported	
Responsible Party	
Address	
Phone Number/Contact	
Describe materials used to clean up spill:	
Describe response measures that have been done, and the schedule for completion of other measures to be taken, or both	
Describe measures taken to prevent recurrence of similar releases	
Completed By:	

Additional Notes:

Secs. 62-381—62-396. Reserved.

ARTICLE III. SEWER USE, CONNECTION AND EXTENSION

Sec. 62-397. Definitions.

The following words, terms and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

B.O.D. (denoting biochemical oxygen demand) means the quantity of oxygen utilized by the biochemical oxidation of organic matter under standard laboratory procedure in five days at 20 degrees Celsius expressed in milligrams per liter.

Building drain means that part of the lowest horizontal piping of a drainage system from the vertical riser most distant from the building sewer to a point five feet from the outside wall of the building, which part receives the discharge from the soil, waste and other drainage pipes inside the walls of the building and conveys it to the building sewer.

Building sewer or house lead means that part of a drainage system extending from the building drain to the public sewer or other place of disposal.

Combined sewer means a sewer receiving both stormwater and sewage.

Garbage means solid wastes from the domestic and commercial preparation, cooking and dispensing of food, and the handling, storage and sale of produce.

Industrial wastes means the liquid or colloidal wastes other than sanitary sewage from industrial, commercial or manufacturing processes.

Natural outlet means any outlet into a watercourse, pond, ditch, lake or other body of surface water or groundwater.

pH means the logarithm of the reciprocal of the weight of hydrogen ions expressed in grams per liter of solution.

Properly shredded garbage means wastes from the preparation, cooking and dispensing of food that have been shredded to such a degree that all particles will be carried freely under the flow conditions normally prevailing in public sewers, and having no particle greater than one-half inch in any diameter.

Public sewer means a sewer that is controlled by public authority.

Sanitary sewer means a sewer that carries sewage and to which stormwaters are not intentionally admitted.

Sewage means a combination of the water-carried wastes from residences, business buildings, institutions, and industrial establishments, together with such groundwaters, surface waters and stormwaters as may have been combined therewith.

Sewage treatment plant means any arrangement of devices and structures used for treating sewage.

Sewer means a pipe or conduit carrying sewage or stormwater.

Sewerage works or sewerage system means all facilities controlled by public authority for collecting, pumping, treating, and disposing of sewage or stormwater.

Slug means any discharge of water, sewage, or industrial waste which, in concentration of any given component or in quantity of flow, exceeds for any period of duration longer than 15 minutes more than five times the average 24-hour concentration or flow during normal operation.

Storm drain or storm sewer means any drain or sewer, either natural or artificial, which is intended expressly for the conveyance of stormwater and uncontaminated industrial wastes.

Stormwater means that part of the rainfall that reaches the sewers as run-off from natural land surfaces, building roofs, pavements or as groundwater infiltration.

Suspended solids means solids that either float on the surface of, or are in suspension in water, sewage, or other liquids, which are removable by laboratory filtering.

Uncontaminated industrial wastes means water that has not come into contact with any substance used in or incidental to industrial processing operations (e.g., unpolluted cooling water).

User means the owner, occupant, or proprietor of any premises connected with and using any of the facilities of the sewer system for the collection and disposal of sewage and other wastes.

Watercourse means a channel through which water or other fluids flow either continuously or intermittently.

(1971 Comp., Ch. VIII, Art. 2, § 1; Code 1999, § 37-103)

Sec. 62-398. Sewer use regulations.

(a) *Required use of public sewers.*

- (1) It shall be unlawful for any person to place, deposit, or permit to be placed or deposited in an unsanitary manner upon public or private property within the city or in any area under the jurisdiction of the city, except in the pursuit of a normally accepted farming or gardening practice, any human or animal excrement, garbage or other objectionable waste.
- (2) It shall be unlawful to discharge into any natural outlet within the city, or in any area under the jurisdiction of the city, any sewage, industrial wastes, or other polluted waters, except where suitable treatment has been provided in accordance with this article.
- (3) Except as hereinafter provided, it shall be unlawful to construct or maintain any privy, privy vault, septic tank, cesspool or other facility intended or used for the disposal of sewage.

- (4) The owners of all houses or other buildings used for human occupancy, employment, recreation or other purpose situated within the city and abutting on any street, alley or right-of-way in which there is now located or shall in the future be located a public sanitary or combined sewer of the city, is hereby required at his expense to install toilet facilities therein, in conformity with law, and to connect such facilities directly with the proper public sewer in accordance with the provisions of this article. If the director of public works and services deems it necessary for reason of public health, a connection shall be made within one year after the date of official notification that the sewer is available; provided that, if a house or building be declared by the city council to be included in a plan of imminent acquisition by the city or by an agency thereof, the city council may, in such case, extend the time within which a connection be made until the land is acquired, the plan terminated or the further order of the city council; and provided, further, in the case of an imminent public health hazard, a connection shall be made within six months after the date of official notice to do so, provided that the public sewer is within 100 feet of the property line.

(b) *Private sewage disposal.*

- (1) Where a public sanitary sewer is not available under the provisions of subsection (a)(4) of this section the building sewer shall be connected to a private sewage disposal system complying with the requirements of the county department of health and any requirements which the city may by ordinance or resolution deem necessary to protect the public health. Temporary use of privies or privy vaults meeting the requirements of the county department of health may be allowed on construction projects with the approval of the city.
- (2) The owner shall operate and maintain the private sewage disposal facilities in a sanitary manner at all times, at no expense to the city.
- (3) At such time as a public sewer becomes available to a property served by a private sewage disposal system, as provided in subsection (b)(1) of this section a direct connection shall be made to the public sewer in compliance with this article and any septic tanks, cesspools and similar private sewage disposal facilities shall be cleaned of sludge and filled with clean bank-run gravel or other suitable material. The connection is to be made within the time provided in subsection (b)(4) of this section.
- (4) No statement contained in this section shall be construed to conflict with any more stringent requirements that may now or hereafter be imposed by the county department of health or any state regulation.

(c) *Allowable use of the public sewers.*

- (1) No person shall intentionally discharge or cause to be discharged any stormwater, surface water, groundwater, roof runoff, subsurface drainage, or uncontaminated industrial waste into any sanitary sewer, excepting only a normal amount of groundwater leakage into footing drains occurring after the backfill of the footing drain and sanitary sewer system. If the city determines that an excessive amount of groundwater

leakage is entering a footing drain, the director of public works and services shall forthwith notify the user of the property of such determination, and the user shall forthwith abate such excessive leakage in a manner approved by the city. In no case shall excavation for footings or basements be drained into a sanitary sewage system. The house lead and building drain, immediately upon being placed, shall be tightly capped and thoroughly leaded, and all interior stacks and openings shall remain in this condition until the basement floor and walls have been laid to grade and exterior footing excavations backfilled to grade. It is anticipated that this requirement will necessitate the use of a temporary sump from which groundwater will be pumped to proper disposal. It is the intent of this requirement that no sand, clay or foreign matter be permitted to reach the city sanitary sewer system or the connections thereto.

- (2) Stormwater and all other unpolluted drainage shall be discharged upon approval of the city, county drain commissioner and other lawful authorities to such sewers as are specifically designated as storm sewers, or to a natural outlet. Uncontaminated industrial waste may be discharged, upon approval of the city, county drain commissioner and state water resources commission and other lawful authorities to a storm sewer or natural outlet.
- (3) No person shall knowingly discharge or cause to be discharged any of the following described waters or wastes into any public sewers:
 - a. Any gasoline, benzene, naphtha, fuel oil, or other flammable or explosive liquid, solid or gas;
 - b. Any waters or wastes containing toxic or poisonous solids, liquids or gases in sufficient quantity, either singly or by reasonably anticipated interaction with other wastes, to injure or interfere with any sewage treatment process, constitute a hazard to humans or animals, create a public nuisance, or create a hazard in the receiving waters of the sewage treatment plant, including, but not limited to, cyanides in excess of two milligrams per liter as CN in the wastes as discharged to the public sewer;
 - c. Any waters or wastes having a pH lower than 5.5, or having any other corrosive property capable of causing damage to structures and equipment, or creating a hazardous condition for personnel of the sewage works;
 - d. Solid or viscous substances such as, but not limited to, ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, unground garbage, whole blood, paunch manure, hair and fleshings, entrails and paper dishes, cups, milk containers, either whole or ground by garbage grinders, in such quantities or of such size as to be capable of causing obstruction to the flow in sewers, or other interference with the proper operation of the sewer works.
- (4) No person shall knowingly discharge or cause to be discharged the following described substances, materials, waters, or wastes into any public sewers unless it is determined

by the city that such wastes cannot harm the sewers, sewage treatment process or equipment, have an adverse effect on the receiving stream, or otherwise endanger life, limb, public property or constitute a nuisance:

- a. Any liquid or vapor having a temperature upon discharge higher than 150 degrees Fahrenheit (65 degrees Celsius);
- b. Any waters or wastes containing fats, wax, grease, or oils, whether emulsified or not in excess of 100 milligrams per liter; or containing substances which solidify or become viscous at temperatures between 32 degrees and 150 degrees Fahrenheit;
- c. Any garbage that has not been properly shredded. The installation and operation of any garbage shredder equipped with a motor of three-fourths horsepower or greater shall be subject to the review and approval of the city;
- d. Any waters or wastes containing acid iron pickling wastes or concentrated plating solutions whether neutralized or not;
- e. Any waters or wastes containing iron, chromium, copper, zinc, and similar objectionable or toxic substances; or wastes exerting excessive chlorine requirement, to such degree that any such material received in the composite sewage at the sewage treatment works exceeds the limits established by the city or county board of public works;
- f. Any waters or wastes containing phenols or other taste- or odor-producing substances in such concentrations exceeding limits which may be established by the city or county board of public works as necessary, after treatment of the composite sewage, to meet the requirements of the state, federal or other public agencies having jurisdiction of such discharge to the receiving waters;
- g. Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the city or county board of public works in compliance with applicable state or federal regulations;
- h. Any wastes or waters having a pH in excess of 9.5;
- i. Materials that exert or cause:
 1. Unusual concentrations of inert suspended solids, such as, but not limited to, Fuller's earth, lime slurries, and lime residues, or of dissolved solids, such as, but not limited to, sodium chloride and sodium sulfate;
 2. Excessive discoloration, such as, but not limited to, dye wastes and vegetable tanning solutions;
 3. Unusual B.O.D., chemical oxygen demand or chlorine requirements in such quantities as to constitute a significant load on the sewage treatment works;

- j. Waters or wastes containing substances that are not amenable to treatment or reduction by the sewage treatment plant only to such degree that the sewage treatment plant effluent cannot meet the requirements of other agencies having jurisdiction over discharge to the receiving waters.
- (5) If any waters or wastes are discharged, or are proposed to be discharged to the public sewers, which contain the substances or possess the characteristics enumerated in subsection (c)(4) of this section, and which in the judgment of the city may have a deleterious effect upon the sewage works, processes, equipment, or receiving waters, or which otherwise create a hazard to life or constitute a public nuisance, the city may:
 - a. Reject the wastes;
 - b. Require pretreatment to an acceptable condition for discharge;
 - c. Require control over the quantities and rates of discharge;
 - d. Require payment to cover the added cost of handling and treating the wastes not covered by existing taxes and charges.

If the city permits the pretreatment or equalization of waste flows, the design and installation of the plants and equipment shall be subject to the review and approval of the city.

- (6) Grease, oil and sand interceptors shall be provided when it is determined by the city that they are necessary for the proper handling of liquid wastes containing grease in excessive amounts, or any flammable wastes, sand and other harmful ingredients; except that such interceptors shall not be required for private living quarters or living units. All interceptors shall be of a type and capacity approved by the city and shall be so located as to be readily and easily accessible for cleaning and inspection. Grease and oil interceptors shall be constructed of impervious materials capable of withstanding abrupt and extreme changes in temperature. They shall be of substantial construction, watertight and equipped with easily removable covers which, when bolted in place, shall be gastight and watertight. Where installed, all grease, oil and sand interceptors shall be maintained by the owner, at his expense, in continuously efficient operation at all times.
- (7) Where preliminary treatment of flow-equalizing facilities are provided for any waters or wastes, they shall be maintained continuously in satisfactory and effective operation by the owner at his expense.
- (8) When required by the city, the user of any property serviced by a building sewer carrying industrial wastes shall install a suitable control manhole together with such necessary meters and other appurtenances in the building sewer as to facilitate observation, sampling and measurement of the wastes. Such a manhole, when required, shall be accessible and safely located, and shall be constructed in accordance with plans approved by the city. The manhole shall be installed by the owner at his expense, and shall be maintained by him so as to be safe and accessible at all times.

- (9) All measurements, tests, and analyses of the characteristics of waters and wastes to which reference is made in these regulations shall be determined in accordance with Standard Methods for the Examination of Water and Sewage and shall be determined at the control manhole provided for, or upon suitable samples taken at the control manhole. In the event that no special manhole has been required, the control manhole shall be considered to be the nearest downstream manhole in the public sewer from the point at which a building sewer is connected.
- (10) Nothing contained in this section shall be construed as preventing any special agreement or arrangement between the city council and any industrial concern whereby an industrial waste of unusual strength or character may be accepted by the city for treatment, subject to payment and indemnity therefor, by the industrial concern.
- (1971 Comp., Ch. VIII, Art. 2, § 2; Code 1999, § 37-105)

Sec. 62-399. Building sewers and connections.

(a) *Permits and connection requirements.* No person shall lay, alter or repair any building sewer or house lead, or make any connections whatsoever with any lateral sewer, trunk sewer, or building drain or do any kind of work connected with the laying of building sewers or house leads or make any repairs, additions or alterations to any drain or sewer connected with or designated to be connected with the sanitary sewer system without first obtaining a written city permit therefor.

- (1) Application for permit shall be made on the application forms furnished by the division of water and sewer of the department of public works and services. All applications for permit, other than a homeowner's permit, shall be made by a contractor who is registered with the city and who is bonded and insured to perform such water/sewer work; such bond and insurance to be as provided in subsection (b)(2) of this section. Each application for a permit shall be assessed an application and inspection fee to defray the cost of processing the application and the subsequent inspections of construction or installation. Should conditions require more than two inspections or should a full-time inspector be required, an additional inspection fee will be charged for all additional time, over and above the normally anticipated two inspections. In the case of commercial, multiple dwelling or industrial developments, a review fee may be charged if the complexity of the waste disposal facilities warrant specific review of the details and plans by the division of water and sewer.
- (2) Application for a permit by a homeowner shall be made on the homeowner's permit form furnished by the city. Homeowners who are not contractors registered to do work in the city may obtain a permit for the laying of building sewers or house leads on premises occupied or to be occupied by the applicant as his residence upon payment of the application and inspection fee and the filing of the proper application forms; provided that the applicant obtains a bond in the amount of \$5,000.00 as a financial guaranty for any damage and complies with the other provisions of this article, including, but not limited to, the payment of any additional inspection or review fees,

the connection and laying of the building sewer in accordance with the rules and regulations of the division of water and sewer and the department of public works and the final inspection and approval of the building sewer prior to the covering of the installation.

- (3) The application and inspection fee, the additional inspection fee and the review fee shall be prescribed from time to time by resolution of the city council.
 - (4) In addition to the application and inspection fee, the additional inspection fee and the review fee all applicants for a sewer connection permit shall be required to pay the applicable capital charge, front-foot charge, connection charge and any other charge provided by city ordinance or by subsequent resolution of the city council.
 - (5) No openings shall be made into the sewer system without first obtaining a sewer connection permit as specified under subsections (a)(1) and (2) of this section. The removal of the cookie or stopper or any other type of connection to the sanitary sewer system shall be performed only in the immediate presence of the department of public works and services inspector. Upon failure to comply with this requirement, the contractor or any other person responsible for the work shall be served with a notice of violation as provided for under sections 62-403 and 62-404. Any contractor who shall knowingly neglect or refuse to comply with the requirements of this article, other rules and regulations hereinafter established or with the conditions of the permit shall be subject to the immediate revocation of his registration by the city, in addition to the other penalties set forth in this article. Any violation by agents, servants or employees of a contractor under the terms of these regulations shall be deemed to be a violation by the contractor in whose name the permit is issued.
 - (6) It shall be unlawful for any person, performing work under a permit for the laying of building sewer, to cover any portion of a building sewer until such time as it has been inspected and approved by the department of public works inspector or his authorized agent. Such person shall give the city written notice when the work is ready for inspection and shall leave the premises in a condition convenient for inspection by the inspector. The licensee shall remove and replace all rejected work, restore all public streets and alleys to a similar condition as existed prior to excavation, and shall make all adjustments necessary to fully meet the requirements under this article, other rules and regulations hereinafter established and the conditions of the permit to the reasonable satisfaction of the city.
 - (7) Old building sewers may be used in connection with new buildings only when they are found, on examination and test by the city, to meet all requirements of these regulations.
- (b) *License, insurance and bonds.*
- (1) Each person or company other than a homeowner applying for sewer connection permits shall be registered with the city. This registration shall contain the following information:
 - a. The legal name of the person or company;

- b. The type of ownership of the company;
 - c. The principals of the company;
 - d. The legal address and business phone number of the person or company;
 - e. The name, address and state plumbing license number of the principal licensed master plumber in the company;
 - f. The name, address and phone number of an individual in responsible charge who can be contacted in the event of an emergency on the project.
- (2) Each person or company acting as principal contractor in the installation, alteration or repair of any building sewer or house lead shall, prior to commencing work, place on file with the division of water and sewer of the department of public works and services, evidence of the following insurance and bonds. All such insurance shall be written with an insurance company licensed to do business and maintaining an office within the state, which office shall have the authority to process and settle claims.
- a. Employer's liability and worker's compensation insurance for all employees to be engaged in work on the project, as provided by the Michigan Workman's Compensation Law.
 - b. Contractor's public liability insurance in an amount not less than \$100,000.00 for injuries to each person and \$300,000.00 for each occurrence, and contractor's property damage insurance in an amount not less than \$50,000.00 for each occurrence and \$100,000.00 aggregate.
 - c. Contractor's motor vehicle bodily injury insurance in an amount not less than \$100,000.00 for injuries to each person and \$300,000.00 for each occurrence and contractor's motor vehicle property damage insurance in an amount not less than \$50,000.00 for each occurrence.
 - d. Owner's and contractor's protective public liability and property damage insurance in the name of the city in an amount not less than \$100,000.00 for injuries to each person, \$300,000.00 for each occurrence and property damage in an amount not less than \$50,000.00 for each occurrence and \$100,000.00 aggregate. Such insurance shall include the so-called explosion, collapse and underground hazards coverage.
 - e. Each such person or company shall procure or cause to be procured insurance coverage as provided in subsection (b)(2)a through d of this section with respect to each subcontractor with whom it contracts.
 - f. A license bond in favor of the city in an amount of not less than \$5,000.00. The license bond shall be prepared on the form prescribed by the department of public works and services and shall be renewed at least once each year. It is the intent of the bond to guarantee that the contractor shall faithfully observe and honestly comply with such ordinances, rules and regulations, and amendments thereto as may apply to the installation, alteration or repair of any building sewer or house lead and, further, that the contractor shall keep all work undertaken within the

period of the bond, whether done by himself or by someone for him, free of defects due to faulty workmanship or defective materials, for a period of one year from completion of work. This work shall be done at no expense to the city. The city shall give the contractor written notice of corrections needed on the project and in the event the contractor fails to undertake the correction of the work, as indicated in the notice, within one week, after the date of such notice, the city may cause the corrections to be made and charge all expenses therefor to the contractor or the surety.

- g. A security cash deposit in the amount of \$100.00 shall be deposited with the city by each person or company. The cash deposit shall be a security deposit for indemnification arising from minor surface damage to adjacent lands. If there is damage, the city shall give the contractor written notice of corrections needed on the project and if the contractor fails to undertake the correction of the damage, as indicated in the notice, within one week, after the date of such notice, the city may cause the corrections to be made and deduct all expenses therefor from the security cash deposit. If the security cash deposit falls below \$50.00, the contractor will be required to renew the cash deposit to the full \$100.00 amount before additional sewer connection permits will be issued to him.

(c) *Use regulations requiring separate building sewer or house lead.* As provided in the county board of public works regulations, the state department of health regulations and the state plumbing code, there shall be a separate building sewer or house lead, independent of that for any other building, for every building connected to the sanitary sewer system, except for those instances where the city determines that one of the following conditions prevails, in which case a multiple connection may be allowed:

- (1) Where one building stands in the rear of a residential building on an interior lot and no sewer is available or can be made available for the rear building through an adjoining alley, court, yard or driveway and where both buildings are under common ownership.
- (2) Where a complex of commercial establishments or multiple dwelling units are situated under a common roof and share common interior walls. The interconnection of adjacent units by companionways or underground utility tunnels does not constitute sufficient physical connection to allow the use of a single building sewer or house lead.
- (3) Where an industrial complex consists of several adjacent buildings that are an integral part of an industrial process or production sequence and where all portions of the complex are under a common ownership. If there is a sale of a portion of the complex, a separate and independent building sewer or house lead will be required for each portion of the divided complex.

(d) *Building sewer or house lead construction methods, materials and standards.* The city council may adopt by resolution from time to time such rules and regulations relating to building sewer or house lead construction methods, materials and standards as it may deem advisable, which rules and regulations shall be published and copies of which shall at all times be available at the department of public works and services.

(1971 Comp., Ch. VIII, Art. 2, § 3; Code 1999, § 37-106; Ord. of 6-24-1991, § 2)

Sec. 62-400. Sanitary sewer and storm drain extensions.

(a) *Use regulations requiring public sanitary extensions.* Except in those instances provided for in section 62-399(c), all sanitary sewers serving more than one building shall be public sanitary sewers.

(b) *Sanitary sewer extension procedure.* All public sanitary sewers installed within the city shall be constructed under contract awarded by the city council. When a person wishes to sponsor the construction of public sanitary sewers, he shall proceed as follows:

- (1) The project sponsor shall submit preliminary plans to the department of public works and services for their tentative approval (approval in principle).
- (2) Upon the giving of tentative approval, the department of public works and services shall refer construction plans to the city engineer for technical review.
- (3) Prior to each review by the city engineer, the project sponsor shall remit to the department of public works and services a sanitary sewer review fee based on the cost of construction as estimated by the city engineer. This remittance is to cover the cost of examination and preliminary engineering work required to determine the adequacy of the plans, the obtaining of the necessary permits from the county board of public works and the state department of health, and the division of water and sewer administration. The schedule or amount of the sanitary sewer review fee shall be prescribed from time to time by resolution of the city council.
- (4) When the department of public works and services, upon the advice of the city engineer shall have declared the plans adequate and all the necessary permits have been obtained, the project sponsor shall submit a complete set of reproducible original drawings for the project along with the evidence of all necessary permits, other than those listed under subsection (b)(3) of this section.
- (5) The department of public works and services shall, upon receipt of the drawings and permits, refer the project to the city council, together with their recommendations regarding construction of the project.
- (6) At such time as the city council may elect to establish a date for receipt of bids, the project sponsor shall be directed to remit to the city or to deposit or secure in such manner as is acceptable to the city council an amount equal to the entire project cost, including construction contingencies, field supervision, staking, inspecting and administration as estimated by the city engineer.

- (7) Upon receipt of the full remittance as defined under subsection (b)(6) of this section, the city clerk shall cause an advertisement for bid to be placed in the appropriate trade publications and direct the city engineer to prepare the necessary bid documents for use by the prospective bidders.
- (8) Following the receipt and tabulation of bids, but prior to the award of a contract, the project costs shall be reviewed to determine if the construction funds previously deposited with the city are adequate to construct the project. If the construction deposit exceeds the adjusted project cost, the surplus shall be refunded to the project sponsor. If the construction deposit is less than the adjusted project cost, the project sponsor shall be given the option of either remitting sufficient additional funds to the city to cover the difference or directing that the bids be rejected, in which case an amount of money equal to the actual administrative, engineering and publishing cost incurred by the city in bidding the project, but in no case less than \$100.00, will be charged to the project sponsor by the city council.
- (9) The city council shall act on the formal award and signing of the contract or the rejection of bids as outlined in subsection (b)(8) of this section.
- (10) Upon completion of the project, the project costs shall be audited and all surplus funds returned to the project sponsor.

(c) *Alternate procedure.* In lieu of the procedure set forth in subsection (b)(1) and (2) of this section, the project sponsor may elect to request the department of public works and services to handle the entire project. In this case, the project sponsor shall remit to the department of public works and services ten percent of the estimated project cost as a good faith deposit. The department of public works and services shall cause engineering drawings to be prepared and the necessary approvals and permits obtained. If the sponsor elects not to proceed with the project, the deposit, or so much as is necessary, shall be used to defray engineering and administrative costs incurred and the balance if any shall be refunded to the sponsor.

(d) *Sewer construction methods, materials, standards and permit procedures.* The city council may adopt from time to time such rules and regulations relating to sewer construction methods, materials and permit procedures as it may deem advisable.

(1971 Comp., Ch. VIII, Art. 2, § 4; Code 1999, § 37-107)

Sec. 62-401. Storm sewers.

(a) No person shall construct, alter, divert, enlarge, enclose, tap into, connect to, or in any manner tamper with any storm sewer, drain or outlet over which the city has ownership, control, regulation, or maintains either in the name of the city or by contract with any other municipality, commission or public body, without first obtaining a permit therefor from the department of public works and services.

(b) Because the storm sewers, drains and outlets possess unique characteristics that do not lend themselves to categorical regulation, it is hereby required that specific plans and specifications be submitted to the department of public works and services setting forth the

design criteria and construction details. The department of public works and services shall then alter, amend or approve plans and issue a permit therefor. The department of public works and services shall set a fee for a permit sufficient to defray the costs of review, inspections and supervision of the permit.

(1971 Comp., Ch. VIII, Art. 2, § 5; Code 1999, § 37-108)

Sec. 62-402. Protection from damage.

No unauthorized person shall maliciously, willfully, or recklessly break, damage, destroy, uncover, deface or tamper with any structure, appurtenances, or equipment that is a part of the sewage works.

(1971 Comp., Ch. VIII, Art. 2, § 6; Code 1999, § 37-109)

Sec. 62-403. Powers and authority of inspectors.

(a) The director of public works and services and other duly authorized employees and agents, bearing proper credentials and identification, shall be permitted to enter all properties for the purposes of inspection, observation, measurement, sampling and testing in accordance with the provisions of this article and shall be empowered to procure all necessary legal process to gain entry to other properties. The director of public works and services shall have no authority to inquire into any processes including metallurgical, chemical, oil, refining, ceramic, paper, or other industries beyond that point having a direct bearing on the kind and source of discharge to the sewers or waterways or facilities for waste treatment.

(b) While performing the necessary work on private properties referred to in subsection (a) of this section, the director of public works and services or duly authorized employees or agents, shall observe all safety rules applicable to the premises.

(c) The director of public works and services and other duly authorized employees and agents of the city bearing proper credentials and identification shall, subject to any pertinent restrictions to the easement, be permitted to enter all private properties through which the city holds an easement for the purposes of, but not limited to, inspection, observation, measurement, sampling, repair and maintenance of any portion of the sewage works lying within the easement. All entry and subsequent work, if any, on any easement, shall be done in full accordance with the terms of the easement pertaining to the private property involved.

(1971 Comp., Ch. VIII, Art. 2, § 7; Code 1999, § 37-110)

Sec. 62-404. Penalties.

(a) Any person found to be violating any provisions of this article except section 62-402 shall be served by the city with written notice stating the nature of the violation and providing a reasonable time limit for the satisfactory correction thereof. The offender shall, within the period of time stated in such notice, permanently cease all violations.

(b) Any person who shall knowingly continue any violation beyond the time limit provided for in subsection (a) of this section shall be guilty of a misdemeanor.

(c) Any person violating any of the provisions of this article shall become liable to the city for any expense, loss, or damage occasioned the city by reason of such violation.
(1971 Comp., Ch. VIII, Art. 2, § 8; Code 1999, § 37-111)

Sec. 62-405. User charges for sewer service.

(a) Rates and charges for the use of the wastewater system of the city are hereby established and made against each lot, parcel of land or premises which may have direct or indirect connections to the system or which may otherwise discharge wastewater either directly or indirectly into the system.

(b) The rates and charges hereby established shall be based upon a methodology which complies with applicable federal and state statutes and regulations. The amount of the rate and charges shall be sufficient to provide for debt service and for the expenses of operations, maintenance and replacement of the system as necessary to preserve the same in good repair and working order. The amount of the rates and charges shall be reviewed annually and revised when necessary to ensure system expenses are met and that all users pay their proportionate share of operation, maintenance and equipment replacement expenses.

(c) The amount of such rates and charges and the intervals at which users of the wastewater system are billed shall be determined no less than annually by the administration and presented to city council for their notification and review. The determination of the administration shall take effect ten days following the date of the meeting in which city council was presented with official notice of such determination unless rejected by a two-thirds majority of the city council.

(d) The rates and charges for operation, maintenance and replacement hereby established shall be uniform within the area serviced by the city. No free service shall be allowed for any user of the wastewater system.

(e) All customers of the city wastewater system shall receive an annual notification, either printed on the bill or enclosed in a separate letter, which will show the breakdown into its component for:

(1) Operation, maintenance and replacement.

(2) Debt service.

(Ord. of 2-1-1993, § 2; Code 1999, § 37-112)

Sec. 62-406. User charges for water service.

(a) Rates and charges for the use of the water system of the city are hereby established and made against each lot, parcel of land or premises which may have direct or indirect connections to the system.

(b) The rates and charges hereby established shall be based upon a methodology which complies with applicable federal and state statutes and regulations. The amount of the rate and charges shall be sufficient to provide for debt service and for the expenses of operations,

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

GENERAL PROCEDURES

CITY OF ROMULUS
12600 WAYNE ROAD
ROMULUS, MICHIGAN 48174



APRIL 2017

SECTION A – PURPOSE

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

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

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

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

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

SECTION C – UPDATES AND PRIORITY REVISION

This inventory shall be updated within 60 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments shall be revised within 60 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

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

Table 1: City of Romulus or Operated Properties with Stormwater Controls

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPW Facility	Catch Basins (2) Salt Dome (1) Stockpiles (7) Dumpsters (2) Diesel Gas Tank (1) Detention Basin (1) Parking Lot Pavement Swales	High	1,3	See Section E
City Hall, Library,Court	Example: Catch Basins (13) Detention Basin (1) Parking Lot Pavement Rain Garden	Low	1	Catch basin cleaning Street sweeping
Animal Shelter	Catch Basins (1) Detention Basin (1) Dumpster (1) Parking Lot Pavement Swales	Low	1	Catch basin cleaning
Fire Station #4	Catch Basins (4) Dumpster (1) Parking Lot Pavement	Low	1	Catch basin cleaning
Mary Ann Banks Park	Catch Basins (2)	Low	1	Catch basin cleaning
OakBrook Park	Catch Basins (4)	Low	1	Catch basin cleaning
Romulus Athletic Center	Catch Basins (7) Detention Basin (1) Bio Retention Basins (2) Dumpster (1) Parking Lot Pavement Swales	Low	1	Catch basin cleaning Sweep parking areas
Senior Center	Catch Basins (3) Detention Basin (1) Dumpster (1) Parking Lot Pavement	Low	1	Catch Basin cleaning
Shook Road Parking Lot	Catch Basins (4) Parking Lot Pavement	Low	1	Catch Basin cleaning Sweep Parking Lot
St. John's Lodge Park	Catch Basins (2) Swales	Low	1	Catch Basin cleaning
Northline Road Pump Station	Pump Station			

In addition to the properties in Table 1, the City of Romulus also owns other property/lots with no structural stormwater controls. These include: Romulus Police Department, Elmer Johnson Park, McAnally Park, Fernandez Park, Raspberry Park, Fire Stations #1, #2, and #3.

SECTION E –SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

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

E.1 Inventory and Description of Materials and Activities

The City of Romulus DPW operations are conducted at 12600 Wayne Road, Romulus, Michigan 48174. This site is considered HIGH priority due to the following operations:

DPW Facility – 12600 Wayne Road

- Fuel/Oil Storage and Fueling
- Salt Storage
- Stockpiled materials
- Dumpsters

Site specific standard operating procedures have been developed for the DPW and are included within this document and as a separate document. Please see the PIPP – Romulus DPW.

SECTION F –CATCH BASIN MAINTENANCE PRIORITY

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

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

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

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

The majority of the City's catch basins have very little sediment accumulation rates, require little maintenance and are of low priority. The industrial area of the City that is located between Wick and Northline Roads and Middlebelt and Inkster Roads is considered medium priority due to the sediment associated with industrial activities in the area and is regularly maintained and inspected twice a year. The City does not have any high priority areas for catch basin cleaning.

Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPW/DPS as needed. At that time, it will be

determined if the catch basin will require maintenance on a more frequent interval and warrants a reclassification to a higher priority rating. In the event the priority rating of a catch basin is changed, or new catch basins are constructed, this procedure will be updated and revised to reflect the change in priority within 60 days.

SECTION G – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING

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

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

- Number of catch basins repaired/cleaned

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

SECTION H – DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance and street sweeping activities is transported to the DPW facility at 12600 Wayne Road where liquid is conveyed to sanitary sewer and solids are dried on drying bed then placed in dumpsters.

SECTION I –STREET SWEEPING PRIORITIZATION

City of Romulus owned and maintained streets/parking lots have been prioritized for street sweeping. The criteria for the priority levels that include low, medium, and high are defined as follows:

Low Priority – Residential streets within the City of Romulus are of low priority due to their minimal sediment accumulation rates. They are generally swept at least one (1) or more times per year.

Medium Priority – Major roads throughout the City of Romulus are of medium priority due to the higher rate of sediment accumulation rates in comparison to low priority residential streets. Medium priority areas are generally swept two (2) or more times per year.

High Priority – Areas that are of high priority have a high rate of sediment accumulation and will require regular, frequent sweeping. These areas are typically located in areas where sediment is easily mobilized and transported by runoff. Additionally, areas that prompt resident complaint or are subject to excessive road sediments are also considered a high priority area. High priority areas are swept as often as required based on inspection.

If the DPW receives a complaint, a determination of the area will be made by DPW staff on whether to increase sweeping on a more frequent interval as well as a reclassify the area to higher priority rating. In the event a priority rating is changed, or new City of Romulus owned streets are constructed, this procedure will be updated and revised to reflect the change in priority within 60 days.

Street sweeping activities are conducted by the City of Romulus DPW staff using Wet Sweeper in accordance with manufacturers operating instructions. Collected sediment from street sweeping activities is disposed of as described in Section H. Street sweeping program activities are not implemented under the following conditions:

- Street sweeping is not conducted on County or State roads
- Sweeping activities are not conducted during wet and inclement weather
- Street sweeping activities is not conducted on private streets, private parking lots, uncurbed streets

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

- Summary of frequency of street sweeping, or total miles swept

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

SECTION – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and street sweeping programs, the City of Romulus also performs inspections of detention basins and pump stations that are maintained by the City.

J.1 Detention Basin Inspections and Oil/Water Separators

Detention basins and oil/water separators that are owned and operated by the City are inspected on a 5-year cycle. If it is determined that maintenance activities are needed, the City will document the needed maintenance actions using a standardized inspection form and perform any maintenance activities as needed.

J.2 Pump Stations

The City currently owns and operates one storm water pump station, which is located between Huron River Drive and Northline Roads. Routine inspection of the pump station is conducted on a bi-weekly basis. Any maintenance is conducted on an as needed basis and documented using the City's log.

J.3 Open and Enclosed Drain Inspections

The routine procedure for open drains consists of the inspection of the inlet grates for blockages every other month, or when complaints received by the City warrant an inspection. In most cases, follow up maintenance activities involve the removal of logjams or other debris that has accumulated on the inlet grate. For enclosed drains, inspections are conducted on an emergency basis only.

J.4 Rain Gardens and Vegetative Swales

Rain Gardens and Vegetative Swales are maintained by the City's Grounds Maintenance Department. Any deficiencies are noted when observed while routinely maintaining. Noted deficiencies are then scheduled for correction.

The City of Romulus does not have any other structural controls that are owned or maintained by the City of Romulus. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 60 days.

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

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

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

SECTION K – NEW APPLICANT OWNED FACILITIES

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

SECTION L – CERTIFIED PESTICIDE APPLICATOR

The DPW Department does not have a certified pesticide applicator on staff and does not apply or store pesticides or fertilizers. In the event the application of pesticides or fertilizers is needed, the City of Romulus retains the services of a licensed applicator.

SECTION M – EMPLOYEE TRAINING

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

Employees Trained	Training Description and Frequency
New DPW Employees	Upon hire, employees will: <ul style="list-style-type: none"> • View the Municipal Storm Water Pollution Prevention Storm Watch training video. • Read and become familiar with the City of Romulus’ SOPs. • Participate in a job shadow program where new staff is paired with an experienced staff member for 30 days.
All DPW Field Employees	Annually, employees will: <ul style="list-style-type: none"> • View the Municipal Stormwater Pollution Prevention Storm Watch training video. • Review proper materials storage and handling. • Review good housekeeping and pollution prevention practices. • Review examples of illicit discharges to the storm sewer system • Review City of Romulus Spill Response Procedures
Key staff	Once per permit cycle: <ul style="list-style-type: none"> • Attendance of key staff to relevant training workshops by the Alliance of Downriver Watersheds, Wayne County, SEMCOG, MDEQ, or others, when available.

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

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

These metrics will be tracked over the reporting cycle that is specified in the City of Romulus Certificate of Coverage.

SECTION N – CONTRACT REQUIREMENTS AND OVERSIGHT

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

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

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

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

SECTION O – PROCESS FOR REVISION

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

SECTION P – SALTING

Salt is distributed at the minimum required rate for cold weather operation. The salt spreaders on the trucks are set for a achieving minimum distribution and are calibrated on yearly basis. Any excess salt will be swept on an as needed basis.

SECTION Q – POTHOLES

Pothole filling is done on an as needed basis and performed in house by the DPW Roads Crew. Cold Patch is picked up at the facility the City is contracted with to purchase.