

STORM WATER MANAGEMENT PROGRAM PLAN

FOR

THE CITY OF TRENTON

REVISED JULY 2006 PER MDEQ REVIEW
UPDATED OCTOBER 2022

**Public Education Plan
Public Participation Plan
Illicit Discharge Elimination Plan
Post Construction Storm Water Management
Construction Storm Water Runoff
Pollution Prevention/Good Housekeeping for Municipal Operations**

**PREPARED IN COMPLIANCE WITH
MICHIGAN DEPARTMENT OF ENVIRONMENT,
GREAT LAKES, AND ENERGY
INDIVIDUAL NPDES PERMIT NO. MI0060189**

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Public Education Plan (PEP)

I. Introduction

Pursuant to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Storm Water Discharge Permit No. MI0060189, the City of Trenton has developed this Public Education Plan (PEP) to promote, publicize, and facilitate watershed education. The PEP will encourage public participation, demonstrate the impact of storm water pollution, and instruct the public on proper use and disposal of chemicals, detergents and other forms of contamination to waters of the State.

The City of Trenton is located on the Detroit River and this location has provided many unique opportunities for the City of Trenton to highlight environmental issues. The City of Trenton has historically depended on its proximity to the Detroit River for industry and recreation and will continue to depend on the River to provide a vital aspect of the community. Currently, the City of Trenton offers many services to its residents that benefit both the community and environment (i.e. brush pick-up, street sweeping, shoreline rehabilitation, etc.). The City also plans and designs construction projects to enhance the environment. The City is currently undertaking development of several expansions of non-motorized paths to encourage travel by bicycle or walking, and is a partner in the development of the Detroit-International Wildlife Refuge which will guard and stabilize the habitat for numerous indigenous plant and animal species. The City recognizes that without continuing public support and education, the benefits realized by these types of projects are not fully realized.

Within this PEP, the City of Trenton's aggressive stance of having a cleaner environment will be taken one step further. Under this Storm Water NPDES Permit, the City of Trenton and Trenton Public Schools continues to be involved in a partnership to educate the general public. Through this educational process, it is hoped the residents will become good environmental stewards. This partnership will allow information to be quickly, economically, and efficiently developed, produced, and distributed through web based technologies, City mailings, the School paper, and public cable access.

In addition to working with Trenton Public Schools, partnerships may be formed with various other agencies such as Wayne County, SEMCOG, and possibly the ADW. Together, these partnerships will use the internet, brochures, newsletters, flyers, public assemblies, and cable television to distribute information and educate the public.

1. Participation in Private Organizations.

- The City Engineer of the City of Trenton is required to participate in the Environmental Advisory Board. This Board is comprised of citizen and employee representation. The employee will actively seek the involvement of the Board in all aspects of the storm water management program. Participation is ongoing as meetings are called. All meetings are public and advertised through local papers and the cable channel.
- The City of Trenton has and will continue to collaborate and pursue input and ideas with SEMCOG and Wayne County Water Quality Division. This collaboration includes telephone calls, e-mails, meetings, surveys and letters.

The City of Trenton will continue to work closely with The Friends of the Detroit River during the annual Detroit River Cleanup Day. This annual event is held at a City public park located on the Detroit River. The City of Trenton has hosted the event, organized by the Friends of the Detroit River for several years now. The City has provided and will continue to provide the location and some equipment required for this annual event. This event is advertised to the public through various outlets including the Friends of the Detroit River website, at City Council meetings, the local papers, etc.

II. Targeted Participants

- Local Civic Organizations
- Environmental Advisory Board
- Friends of the Detroit River
- Trenton Public Schools
- City of Trenton Engineering Department
- City of Trenton Department of Public Works
- City of Trenton Wastewater Treatment Plant
- Wayne County – Water Quality Management Division
- Persons living, working or visiting the City of Trenton
- Businesses within the City Limits

III. Outline of Efforts for Public Education

- 1. Encourage the public to report the presence of illicit discharges or improper disposal of materials into the City's separate storm water drainage system and develop and publicize a hotline for public reporting.**
 - Residents can contact the City of Trenton Engineering Department or use the Wayne County 24 hour environmental hotline to call to report any illicit discharges into the storm system. Information will be handed out, placed on mailings and on the City and School District websites to describe what illicit discharges are and how to report them. This information will be provided on a continuous basis.
 - Storm structures have been clearly identified to discourage illicit discharges and a program to maintain the identification properly including in the City of Trenton Engineering Storm Sewer Standards for all new structures, repairs and replacements.
 - Information about the effects of illicit discharges has been made available to the public through various sources, such as local newspapers and the City's web page. The City in 2022 will update content on the City's Website Storm Water Public Education page to include an educational content focusing on the effects of illicit discharges **ITEM 5C**

2. Education of the public on the location of residential separate storm water drainage structures and the water bodies that they discharge to and potential contaminants that could impact the storm system.

- Historically, the City of Trenton has painted the collection structures of the storm system with yellow arrows to easily identify the structures. This program was discontinued as a use of storm identification by the public due to the vagueness of the painting. Currently, the painting program has evolved to a more permanent type of marking with a representative emblem through the Engineering Department Standards for Storm Sewer construction. Residents are notified of the new markings through the public cable access and website publications. *The “Water Quality It’s In Our Hands” video PSA / Video commercial will be broadcasted bi-monthly starting in 2022 on the City Website as well as in conjunction with our City Council Meetings on our YOU TUBE channel in an effort to target our older age groups. The intention of the video will be to both inform and educate the public on the relationship between our actions and our impacts on the storm system, as well inform the public of sources of contamination which enter the system and various actions to take to reduce pollutants entering the system. Various organizations will be asked to assist in this program (i.e. School, environmental advisory board, local businesses and other volunteer groups). The pilot program that included the decals took place in 2006 and the permanent emblem in the storm structure covers started in 2009 and has continued for the past 8 years on all new structures and repairs/replacements.*
- The City of Trenton will provide on its web page and Facebook information as to how an illicit discharge or dumping of wastes into the storm system will directly impact the communities open waterways. The City will also provide a link to a map indicating the City of Trenton Outfalls including identification nomenclature/numbering for residents to better identify the outfall for reporting to the City any unusual or possible pollution occurrences. The Trenton Public School District will provide a link from the District Website to this information **ITEM 5 B.**

3. Education of the public on the availability, location and requirements of facilities for disposal or drop-off of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.

- The City of Trenton continues to reach City residents through the City’s Website content under the Department of Public Works General Info linked sections as well as the Storm Water Public Education page under Tips & Useful Information Recreational Vehicle. It contains information detailing the location, times, and list of acceptable items (i.e. batteries, oil, aerosol cans, etc.) for disposal and also lists specific items which cannot be dropped off at the City-owned solid waste transfer station. Some of the refused items may be picked-up by City workers as part of a special pick-up program (i.e. tires, refrigerators, freezers, etc.). A phone number is listed for questions and most of these services are free of charge or require a minimal fee. This service has been offered to City residents for in excess of 10 years.

- The City of Trenton, in cooperation with Wayne County, the Downriver Community Conference (DCC) and the City of Taylor, holds several household hazardous waste collection days when residents can properly dispose of household chemicals not normally accepted at the City's transfer station. The program is currently running and occurs several times a year. It is also announced at the Council meetings and through the local cable channel.
- Organic debris (i.e. wood, brush, leaves, grass clippings, etc.) are kept separate and picked up weekly by the City for composting. This coincides with normal trash pickup and is an on going project. The City requires the use of 96 gallon containers that separate household waste from yard waste.
- Private commercial facilities are located within the community for sanitary waste disposal from recreational vehicles and related information will continue to be available for residents to refer to under the heading Recreational Vehicle information under Tips & Useful Information currently on the website. Which lists the Marathon gas station at the northwest corner of Van Horn Road and W Jefferson Avenue as a location in the City for Boat/RV wash and cleanout stations.
- The Trenton Public School District will also provide a link to the City Website Content from the School District Website for promoting to the public the listed information above **ITEM 5 F & G.**

4. Education of the public on the proper application and disposal of pesticides, herbicides and fertilizers.

- Information regarding the proper application and disposal of fertilizers, pesticides, and herbicides will continue to be available on the City Website, as well as updated information added in 2022 to bolster the information available currently on the Storm Water Public Education webpage under Tips & Useful Information Lawn and Garden.
- In cooperation with the Wayne County Water Quality Division and SEMCOG, a series of educational brochures has been made available to the public to outline the proper way to use fertilizers and chemicals. This information has been placed on a large table top display at the City Hall and is updated periodically. The information is also available on the City's website.
- The Trenton Public School District will also provide a link to the City Website Content from the School District Website for promoting to the public the listed information above **ITEM 5 E.**

5. Education of the public on the importance of preferred car cleaning agents and procedures for non-commercial car washing.

- Information regarding car wash water in the past had been placed in *The Buzz* on an annual basis. This publication was delivered to every household in Trenton, but has been since discontinued. The City will now post this information on the City Website.
- In cooperation with the Wayne County Water Quality Division and SEMCOG, a series of educational brochures has been made available to the public to outline the proper way to use fertilizers, wash cars, compost, dispose of household hazardous waste and chemicals. This information has been placed on a large table top display at the City Hall. The information has also been placed on the City's website.
- Storm structures have been provided with an emblem or paint scheme to make the public aware that storm structures drain directly to the River without treatment. Use of the public access cable and school channels can further show the public the effects of wastes washed into the storm system.
- The Trenton Public School District will also provide a link to the City Website Content from the School District Website for promoting to the public the listed information above **ITEM 5D**.

6. Education of the public about the proper maintenance of septic sewer systems.

- The City of Trenton is an established community with a separated sanitary sewer servicing every home and business. It is in violation of the City Building Code to develop or use property without connecting to the sanitary sewer system. Septic fields are not permitted within the City of Trenton by City Ordinance. **ITEM H**.

7. Education of the public concerning management of riparian lands to protect water quality.

- The City of Trenton continually works to restore and improve habitat along the Detroit River and Frank & Poet shoreline. This includes street end parks, tree planting, native vegetation and general maintenance. Signs with information concerning the project, habitat concerns, and importance of these areas are posted as significant projects are completed.
- City personnel will continue to work with the schools through activities sponsored by the Friends of the Detroit River to support the development and implementation of a hands-on approach to demonstrate the importance of these parks to water quality, wildlife habitat, and overall aesthetic beauty. These types of activities have been regular occurrences and continue to have excellent attendance.

- The City of Trenton will continue to enhance and protect the street-end parks with the financial assistance and participation of the Downtown Developmental Authority and the City Beautification Committee. These partnerships will inform businesses and the visiting public through flyers, signage, and announcements at City Council meetings.
- Information about riparian land management has been made available at City Hall and other public facilities in the form of brochures and on the City webpage. This information will continue to be made available.
- Additional information can be available to the interested public through web sites and more detailed publications. This information will be updated as new information is collected.
- Promote the use of soft engineering BMPs to owners of private riparian lands, including residential and commercially owned, through targeted mailings of brochures and information packets. Starting in 2009, all riparian land owners within the City were specifically targeted through a mailing. This topic will continue using education materials on the City website.

8. Education of the public about their responsibility and stewardship concerning storm water.

- The City is cooperating with local nested jurisdictions, Wayne County Water Quality Management Division and SEMCOG to establish the best avenue to pursue. This is an ongoing effort and has been successful thus far.
- Information has been made available in flyers and displays at Trenton's City Hall and other publicly owned facilities. Distribution of the flyers began in early 2005 and continues today. A large table top display was prepared in 2006 and will continue to be displayed at City Hall throughout the year. In addition to flyers being posted, brochures from SEMCOG's "Our Water. Our Future. Ours to Protect. – Seven Simple Steps to Clean Water" public education campaign have been made available to the public in the Westfield Community Center, Trenton Department of Public Services, Trenton Public Library and Trenton City Hall.
- The City of Trenton has developed a strong relationship with the Trenton Public Schools and together will develop a strategy to distribute additional information. Information is placed in the *Trenton School Reporter* (Annual), water quality reports (Mailed to all addresses within the City), and the City Website with links to the content also available from the School District Website. Information has been mailed to residents since January 2005. These mailings included content regarding car wash water, watering lawns, hazard chemical disposal information, illicit discharge hotline number, etc. These messages will be continued as indicated above.
- In addition to publications, Trenton Schools will provide a link to The "Water Quality It's In Our Hands" video PSA / Video commercial.

- City employees within the Department of Public Works have attended seminars periodically about storm water and soil erosion issues. Topics discussed included the IDEP program, good housekeeping/pollution prevention and construction storm water runoff/soil erosion control program. All DPW supervisors will continue to attend and participate in other locally sponsored seminars such as the “Keeping it Clean” seminar hosted by SEMCOG as well as in-house training.
- The City will continue to work closely with the Schools to develop methods of reaching school age children about the value of being good stewards on an annual basis. This includes handouts and activity sheets for the schools from the Engineering Department. The City and schools are working together to continually develop programs which will highlight storm water and water related issues.
The program will include hands-on activities and handouts. Trenton High School students previously developed a storm water video that has been played several times on the local cable channel. The City Engineering Department continues to forward handouts to each of the schools that include fun activities (mazes, word searches, puzzles, etc.) centered on the watershed and stewardship with storm water. This will continue over the permit.
- The City of Trenton will continue to assist The Friends of the Detroit River during the annual Detroit River Cleanup Day. This annual event is held at a City public park located on the Detroit River. The City of Trenton will also continue to support and partner with Wayne County Water Quality Division and SEMCOG to perform stream bank stabilization and demonstration projects, public distribution of information or any other storm related project. Public participation will be used to determine the effectiveness of the program.

9. Education of the public concerning the impact of residential deicers.

- Information concerning the proper application of deicers will be available to the public on the City of Trenton’s website. The information will be updated in 2022 to also speak to the impact of deicers on the watershed.

10. Education of the role of native vegetation on residential properties as a ground cover alternative to turfgrass.

- A flyer will be developed for distribution to the public providing information on the use of native vegetation in lieu of turf grass. This information was part of the riparian information package directly mailed to the residents living along a water-course in 2009. This information will continue to be available on the City Website.

11. Education of commercial, industrial and institutional entities likely to have a significant storm water impact.

- The City of Trenton distributed a BMP that was developed by the Alliance of Rouge Communities by mailing in 2010. This continues to be an annual notice sent to every licensed commercial food service. The brochure included a fact sheet for the BMP and a fact sheet covering restaurant oil and grease rendering to explain the problems with disposing oil and grease improperly. The transmittal letter that introduced the brochure also included a link to the FOG prevention at the EPA site. The effectiveness of this information will be determined from the number of violations reported in the annual report of the existing Fats, Oils, and Grease (FOG) program. **ITEMS 5 A & J.**

12. Educate the public on, and promote the benefits of, green infrastructure and low impact development.

- The City of Trenton in 2022 will update the City's Storm Water Public Education web page to include information as well as promoting Residential rain gardens and rain barrels for a way for residents to do their part in managing runoff.

IV. Priorities

In order to make the largest impact as quickly as possible on water quality, the City of Trenton continues to educate its own employees first, then the groups in partnership with the City of Trenton, followed by the general public and the business community. Employee education continues as a top priority and will continue to play an important role to meet this PEP.

Since the objective of this plan is to educate, the City of Trenton continues to work with the schools to also educate the students. In order to accomplish this, the City will work closely with the Trenton Public Schools to establish the best method of introducing the information to various ages. When the material is prepared, City personnel will assist the Schools in presenting this information.

The City intends to properly educate and inform everyone who works and/or lives in the City of Trenton. We have the following objectives to attempt to obtain our goals.

- *Employees training will be implemented to inform appropriate personnel of the responsibility of safety, environmental impacts, how to identify an illicit discharge, positive reinforcement for protecting the existing storm water infrastructure, and outline the negative impacts of not protecting our environment. (Measurable Goal of Completion of Training once per permit cycle)*
- *A worksheet exercise will be generated and distributed throughout the Trenton School system in an effort to educate our future stewards of our environment. (Measurable Goal of Improving Awareness for K-12)*
- *A video commercial will be generated and broadcasted bi-monthly in conjunction with our City Council Meetings on our YOU TUBE channel in an effort to target all Citizen groups. (Measurable Goal of Improving Awareness for post K-12)*

ITEM 4.

V. Plan for Evaluating Impacts of the PEP

The impact of the Public Education Plan will be measured in several ways:

1. Volunteer participation in storm water activities.
2. Number of brochures mailed or picked up at public facilities.
3. Number of “hits” on City website.

The impacts will be evaluated as they pertain to the objectives outlined in the PEP. Public involvement and participation will be very important to the longevity and posterity of any storm water program. It is hoped that as the PEP evolves, the public participation will increase. In addition, the City of Trenton will compare its progress to that of the neighboring watersheds. Through cooperation with this group, the effectiveness of our PEP will be evaluated from the public participation during storm water activities aimed at cleaning and protecting our receiving waters.

The City of Trenton will consider any study which it feels is required to accurately gauge the effectiveness and impacts of the PEP. When a study is beyond the City’s capability, Wayne County and outside resources will be enlisted to assist in the study, development and execution as long as costs can be covered by City funding. When a study is necessary, the results can be made available to the public. An overview of the results from these reports can also be included in progress reports required by the storm water permit. **ITEM 6.**

Public Involvement and Participation

Introduction

Pursuant to the Michigan Department of Environment, Great Lakes, and Energy Storm Water Discharge Permit No. MI0060189, the City of Trenton has developed this Public Involvement and Participation Plan to encourage public input and participation in the development of all aspects of the Phase II Storm Water requirements.

The City shall follow local public notice requirements, as appropriate, when notifying the public that a storm water 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.

It is the City’s intention to have this plan progress as time passes. This will allow the City to better accommodate the changing environment. Also, by allowing the plan to develop over time, the plan will be better equipped to encourage the participation of different groups of people instead of always appealing to the same group over and over. Ideally, the City would like to reach each and every household in the city and every visitor to the city.

II. Targeted Participants

- Residents
- Environmental Advisory Board
- Civic Organizations
- Friends of the Detroit River

- Trenton Public Schools
- Employees of the City of Trenton
- Businesses within the City of Trenton
- Visitors

III. Outline of Efforts for Public Involvement and Participation

Public Notification of the Requirement to Implement a Storm Water Management Program. ITEM 3.

The City Clerk notified community residents of the requirements of the storm water management program to be implemented. Additional notifications to the community will be published as needed.

Information regarding the SWMP will be included on the City's Facebook Page and Website to notify the Public when changes occur.

A notice to the public on how to inspect the SWMP and comment has been posted on the City's web page and posted at the City Clerks display board. **ITEM 2**

The City's SWMP will be posted on the City website. An email address and/or phone number will be posted that citizens can use to contact City officials with any questions or comments they have. Copies of the storm water management program and permit information is available to the public upon request from the Engineering Department. **ITEM 3**

Illicit Discharge Elimination Program (IDEP)

I. Introduction

The City of Trenton continues to work with Wayne County Water Quality Division to address water quality issues. This Illicit Discharge Elimination Plan (IDEP) is dependent on the cooperation of various organizations and departments within the City and surrounding communities (i.e. Wayne County, Michigan Department of Environment, Great Lakes, and Energy, nested jurisdictions, Frank & Poet/ Blakely Watershed community, etc.). This IDEP will describe specific elements to be completed by the City and by these other organizations.

Since prevention is more cost effective than working to find and eliminate pollution sources, the Public Education Plan (PEP) will be a very important part to water quality protection. This IDEP will take an aggressive approach to the identification and elimination of pollution infiltration into the storm sewer system.

Over the past 15 years, the City of Trenton has spent substantial amounts of time and money investigating illicit connections into the sanitary system and has conducted a sanitary sewer evaluation survey (SSES). When a problem is discovered in the storm system, the experience and techniques (i.e. smoke testing, dye testing, video inspection, etc.) used during the SSES will be utilized to investigate the source of the pollution within the storm system.

The City has started developing a GIS (Geographical Information System) for the City's Storm Sewer System which will eventually be used to locate and assess the condition of all City and School District owned storm water facilities, allowing the City to better monitor the storm system and identify pollution sources and how best to eliminate pollution.

II. Legal Basis

The City of Trenton Ordinance 743, "Illicit Discharge and Storm Water Connections", gives the City legal standing to investigate and eliminate illicit discharges. These provide for any legal action required, from fines to imprisonment. In cases where the problem is outside of the City's jurisdiction, the City will cooperate with the Michigan Department of Environment, Great Lakes, and Energy and Wayne County to resolve the issue as efficiently as possible. If required in the future, new ordinances can be passed to address the needs of meeting storm water issues.

III. Detection, Part One: Locating Problem Areas

1. The City of Trenton will begin Facility Dye Testing all City Buildings and School District Buildings to verify internal plumbing is appropriately plumbed to the Sanitary Sewer system, to insure no illicit connections from City or School Properties are entering the Storm Sewer System.
2. Visual inspection of 100% of the outfalls in the storm system under the City of Trenton's control will be performed every 5 years under dry weather condition.
3. Dry-weather screening is to be performed a minimum of 48 hours or longer after a rain event. The visual inspection will consist of documenting the presence or absence of storm water flow. The presence of deposits and/or stains on the discharge structural device will be documented. The color of the discharge (if applicable) and the existing condition of the adjacent vegetation will also be documented. Biological items to be documented (if applicable) will include bacterial sheens, algae, and slimes. All of the

above referenced items may be an indicator of an illicit discharge. Outfalls or points of discharge observed to have flow will be revisited within 24hrs to collect samples for laboratory analysis. Laboratory analysis shall include pH, Temperature, Conductivity, Ammonia, TSS, and Ecoli. (SEE Dry Weather Screening Field Sheet)

4. Designated City employees will conduct visual inspections and compile photos of the storm system and outfalls as well as test outfalls. In addition, City employees will be trained to be observant for any illicit discharge during their daily job functions. **ITEM 10.**
5. Locations identified through visual screening, complaints, and water quality testing that require further analysis will be prioritized and evaluated within 24 hours, as per the procedure outlined under Section V. Outfalls potentially discharging polluted material will be sampled and tested by the City of Trenton's Waste Water Treatment Plant (WWTP) personnel or will be delivered to contracted labs for testing.
6. A telephone hotline through the Wayne County Water Quality Division allows 24-hour access to the community for reporting suspicious discharges. This hotline will be advertised throughout the community on the local cable channel several times a year as well as on the City of Trenton Website. The City of Trenton Engineering Department can be called during business hours and in addition to the hotline, the City of Trenton Police Department can also be called 24 hours a day.
7. In addition to reactive approaches already in place the City of Trenton will receive a digital file locating aspects of the entire storm system. Records will be updated to include changes in the system with the updated data being included into a digital file. This will allow the City of Trenton to more readily identify any possible illicit connections. Furthermore, this electronic file will be the basis for a future database to store all storm sewer related information.

IV. Detection, Part Two: Finding the Source

1. Complaints related to illicit discharges will be promptly investigated as reported, typically no later than the day after receipt. In addition, as the storm system mapping continues unknown connections will be investigated to ensure that they are compliant.
2. The City of Trenton is committed to Facility Dye Testing City and School District Building over the Permit Cycle to verify all plumbing is entering the appropriate sewer.
3. Outfalls which are tested and found to contain pollutants will be further investigated by source-tracking the pollution upstream through the drainage system. Supplementary sampling and testing, televising, trace dyes, and smoke are possible methods that will be used to locate the source of the contamination. All methods and materials used shall be approved by the EGLE. These traces and tests are to be accomplished no later than two weeks after receipt of the initial complaint or observation by City personnel. **ITEM 12.**

V. Removing/Correcting Illicit Connections

1. Existing State laws, local ordinances, current plumbing codes and rules and regulations will be used to correct illicit discharges and connections. Any ordinances or codes which need enhancement will be revised and presented to the City Council after it has been determined that the current code or ordinance is inadequate to meet the required goal.

2. With the assistance of the Administration, the City Attorney and the Department of Public Works, the Engineering Department will administer the City's IDEP (Illicit Discharge and Elimination Program). Any or all of the staff within these departments may be used to conduct illicit discharge surveys and enforcement of the applicable laws against violators.

3. The procedure typically followed to respond to complaints or observations of an illicit discharge is as follows:
 - Go to the site of the alleged violation within 24 hours of receipt of the complaint
 - Take photos, measurements and record any observations made.
 - If appropriate, provide testing of the illicit discharge and make an attempt to identify pollutants within 72 hours of initial observation. Some tests are sent for lab work and may take substantially longer than 72 hours.
 - Additional testing such as dye testing or smoke testing may be used to identify the source of the discharge. **ITEM 14.**

4. The procedure for reporting any illicit discharge includes immediately contacting EGLE Water Resources Division and if appropriate, the Wayne County Department of Public Services. After hours reporting is directed to the EGLE 24-hour Emergency Alerting System. (800-292-4706).
 - Any illicit discharge that may be in excess of threshold reporting quantities identified in the Part 5 Rules is reported immediately to EGLE Water Resources Division. **ITEM 15.**

5. Employee training for Trenton DPS employees and Trenton Public Schools Maintenance Staff occurs according to the schedule below. Engineering Department employees are required to keep current on any NPDES alterations or any SESC law changes and will frequently follow the same training regimen as DPS employees. **ITEM 18.**

DPS & School Maintenance Employee Training Program

Employees Trained	Training Description and Frequency
New DPS / School Maintenance Employees	Upon hire, employees will: <ul style="list-style-type: none"> • View the MDNRE online employee training video “Stormwater Employee Training” during the Phase II permit cycle. • Documentation of employee training, topics covered, who attended and date of training will be recorded on a Training Sign-in Sheet

All DPS and School Maintenance Staff (involved with stormwater activities)	<ul style="list-style-type: none"> • Review Spill Response Plan • View SEMCOG stormwater training during the Phase II permit cycle • View the MDNRE online employee training video “Stormwater Employee Training” during the Phase II permit cycle. • Documentation of employee training, topics covered, who attended and date of training will be recorded on a Training Sign-in Sheet
All Staff that apply pesticides or herbicides	<ul style="list-style-type: none"> • Obtain and maintain Michigan Department of Agriculture pesticide certification and training to handle, mix, and apply pesticides on municipal property. • Copy of Certification will be provided for proof of training

VI. IDEP Evaluation and Effectiveness

1. The evaluation of the City’s IDEP will occur annually and will involve comparison of the number of illicit discharges located versus the number eliminated. Other tools used for measuring effectiveness of the IDEP includes the time needed to correct an illicit discharge and discerning whether or not resources are sufficient.

Post Construction Storm Water Management

I. Introduction

Pursuant to the Michigan Department of Environment, Great Lakes, and Energy Storm Water Discharge Permit No. MI0060189, the City of Trenton will adopt Wayne County’s Post Construction Storm Water Management Program for new development and redevelopment projects to prevent or minimize water quality impacts.

Currently, the City of Trenton regulates environmental impact from development according to Part 91 of Public Act 451 of 1994 for soil erosion and sedimentation control with EGLE approved MEA and APA programs. This covers all development and redevelopment projects which disturb more than one acre or are within 500 feet of waters of the state. Additionally, if there appears to be an issue with sewer capacity, the developments are required to detain their storm water for regulated release. These developments and redevelopments are also required to treat their storm water to ensure the released water is free of sediment and contaminants to the maximum extent practical.

Public Education will be vital to an effective post construction storm water management program. All efforts will be made to coordinate the two programs. In addition, the City of Trenton will adopt the Wayne County Stormwater Standards for post construction and refer to manuals which relate to storm water, shoreline protection, and other publications which will help run an effective program. Such manuals include “Best Management Practices for soft engineering of Shorelines.”

II. Outline of Efforts for Post Construction Storm Water Management

Under current laws, sites are required to make use of detention ponds, retention ponds, restricted outfalls, or any other means to reduce the effects of the development on the receiving waters. Future developments may be required by the City to install water treatment controls. Vegetative buffers are highly recommended by the City for all developments and the City works hard with the developer to build in phases, if possible, to reduce the amount of disturbed land at any one time. Developments

are encouraged to provide vegetative buffers and biological filters whenever possible.

III. Legal Basis

- x. The City of Trenton has adopted a storm water ordinance, Section 98- 320, et seq., to address storm water management post-construction of all new developments and redevelopments. This ordinance requires a signed agreement with the developer/owners of the site for future maintenance of the new storm system. This agreement becomes part of the recorded deed and continues with the land as binding on subsequent owners. The City is researching work within the watersheds and the County to implement a consistent inspection process for all developments.

Construction Storm Water Runoff Control

I. Introduction

Pursuant to the Michigan Department of Environment, Great Lakes, and Energy Storm Water Discharge Permit No. MI0060189, the City of Trenton has developed this Construction Storm Water Runoff Control Program for new development and redevelopment projects to prevent or minimize water quality impacts. This plan is closely related to the City's current soil erosion and sedimentation control program which is under the oversight of the Engineering department.

II. Outline of Efforts for Construction Storm Water Runoff Control

Any construction project over one acre or within 500 feet of any waters of the state currently require a permit from the City of Trenton for Soil Erosion and Sedimentation Control (SESC) per the requirements of Part 91. All permits require a thorough SESC plan review, including all measures to be undertaken to protect the environment from soil erosion. The City of Trenton maintains a MEA and APA status with the State of Michigan under Part 91. This program has been approved by the EGLE.

Sites that do not require a Soil Erosion and Sedimentation Control permit will be reviewed to verify that the contractors and developers responsible for construction within a site shall maintain control of waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary wastes that may cause adverse impacts to water quality.

Construction sites which have soil erosion permits are inspected weekly and after every major rainfall event. All complaints regarding soil erosion issues are investigated by the Engineering Department within in 48 hours.

Should a construction activity result in a discharge of soil, sediment, or other pollutants into the City's MS4, the Engineering Department will take immediate action to correct the discharge as well as report the occurrence to EGLE within 24 hours of discovery of the discharge.

Construction activities that proceed in defiance of SESC laws will be halted and fully prosecuted. The City pledges to work with other agencies such as EGLE or Wayne County should other laws or ordinances be violated concurrently.

The landowner or recorded easement holder of the property where the construction activity will occur will be notified during the SESC permit application process per the State of Michigan Permit by Rule (Rule 323.2190).

Pollution Prevention/ Good Housekeeping for Municipal Operations

I. Introduction

Pursuant to the Michigan Department of Environment, Great Lakes, and Energy Storm Water Discharge Permit No. MI0060189, the City of Trenton has developed this Pollution Prevention/ Good Housekeeping for Municipal Operations Plan for city property, equipment, and handling of wastes.

The City currently performs all of the services required to maintain the City infrastructure. This includes maintenance of the utilities, the fleet of vehicles, equipment, parks, and buildings. Employees receive training to show how each of their duties can affect storm water quality. This training addresses soil erosion and sedimentation control, proper use and storage of de-icers and chemicals, properly handling wastes, recyclables, chemicals, maintaining the work area, effects of pollution to aquatic life and proper procedures for reporting problem areas.

II. Outline of Efforts for Pollution Prevention/ Good Housekeeping for Municipal Operations

xi. Structural Controls –

- xii.** Catch basins, inlets, and sewers will be regularly cleaned when possible, or as needed. Catch basins will be cleaned when 50% full per section IV-B. The effectiveness of the program will be linked to the effectiveness of the other aspects of the storm water management plan. Filters will be used in inlets and catch basins which are determined to be the largest contributors to poor storm water quality. Sections of sewer requiring frequent heavy cleaning will result in an investigation into the cause which may lead to increased street sweeping, public education, or other corrective actions. The effectiveness of these efforts will be measured on an on-going basis through storm water outfall analysis at the Waste Water Treatment Plant (WWTP). If water quality decreases, then the IDEP will be implemented. These structures will be inspected at least every five years unless conditions require more frequent inspection. All inspections will be recorded and maintained for future reference.

xiii.

The storm structures located near stockpiles of sand and stone have been fitted with filters to prevent any soils from entering the storm system at this point. These filters will be cleaned yearly, or more frequently as may be necessary. Additionally, the area around the salt barn is maintained daily during snowy or icy weather events so all salt is kept in the vicinity of the barn and will not wash into any storm structure.

xxiv. Storm Sewer Labeling –

- xxv. The City of Trenton Engineering Department has changed their standard details for all storm structures back in 2002. All new covers must have a fish emblem, storm sewer stamp, and drains to river stamp. The labels will reinforce that these structures drain directly to the river without treatment and no waste should be dumped into them. This aspect will tie into public awareness.

xxvii. Flood Control Projects –

- xxviii. Any existing project will be reviewed for the incorporation of storm water quality protection which may be required in addition to the proposed structures. All future projects will be assessed to ensure they have no impact on the water quality of the receiving waters.

III. Inventory

A. Applicant owned and nested jurisdiction facilities.

See TR Facility & TR Schools Tables for Addresses and Structural Controls Inventory **ITEM 64.**

1. Trenton Department of Public Services – 23 Storm Structures (High)
2. Kennedy Aquatic Center / Pool – 0 Storm Structures (Low)
3. Kennedy Recreation Center / Ice Arena – 16 Storm Structures (Low)
4. Trenton City Hall – 1 Storm Structure (Low)
5. Trenton Department of Public Safety– 1 Storm Structure (Low)
6. Trenton Library / Administration – 6 Storm Structures (Low)
7. Trenton Cultural Center – 1 Storm Structure (Low)
8. Westfield Center– 0 Storm Structures (Low)
9. Trenton Fire Hall No. 2 – 0 Storm Structures (Low)
10. Affholter Park – 2 Storm Structures (Low)
11. Hass Park– 0 Storm Structures (Low)
12. Kennedy Park– 0 Storm Structures (Low)
13. Lathrop Park– 0 Storm Structures (Low)
14. Lexington Park– 0 Storm Structures (Low)
15. Lions Park– 0 Storm Structures (Low)
16. MacArthur Park– 0 Storm Structures (Low)
17. Meyer Ellias Park– 0 Storm Structures (Low)
18. North McLouth Park – 1 Storm Structure (Low)
19. Rotary Park– 5 Storm Structures (Low)
20. South McLouth Park – 2 Storm Structures (Low)
21. Slocum Truax Park– 0 Storm Structures (Low)
22. Tefend Park– 0 Storm Structures (Low)

23. Teifer Park– 2 Storm Structures (Low)
24. Williamson Park– 0 Storm Structures (Low)
25. Trenton High School/ Board of Education – 53 Storm Structures (Low)
26. Authers Middle School/ Maintenance Bld– 14 Storm Structures (Medium)
27. Anderson Elementary School – 12 Storm Structures
28. Hedke Elementary – 16 Storm Structures
29. Police Storage & Gun Range– 3 Storm Structures (Medium)
30. Elizabeth Park Sanitary Pump Station– 0 Storm Structures (Low)
31. Jefferson Sanitary Pump Station– 0 Storm Structures (Low)
32. Brookview Sanitary Pump Station– 0 Storm Structures (Low)
33. George St. Storm Water Pump Station– 1 Storm Structure (Low)
34. Van Horn Sanitary Pump Station– 0 Storm Structures (Low)
35. Third St. Sanitary Pump Station– 3 Storm Structures (Low)
36. Elm St. Parking Lot– 0 Storm Structures (Low)
37. Birchwood Parking Lot– 1 Storm Structure (Low)
38. Parkside Green Space– 0 Storm Structures (Low)
39. Bloomdale Cemetery– 0 Storm Structures (Low)
40. Masonic Cemetery– 0 Storm Structures (Low)
41. Syckelmoore Tot Lot– 0 Storm Structures (Low)
42. Cora Tot Lot– 0 Storm Structures (Low)
43. Fox Ct. Tot Lot– 0 Storm Structures (Low)
44. Water Building – 0 Storm Structures (Low)

B. Applicant owned structural controls.

See TR Facility & TR Schools Tables for Addresses and Structural Controls Inventory

ITEM 60.

C. Currently, revisions to the City's inventory is made by hand, typically upon completion of a construction project and after as-built plans and inspection reports are finalized. Upon full installation of the City's GIS system, all new construction or other alteration of the City's infrastructure will be digitized as part of the submittal of as-built documents. This will normally take less than 30 Days. **ITEM 62.**

D. All City and Schools facilities will be evaluated on a regular basis for the potential to discharge pollutants to water of the MS4. New construction will be carefully reviewed prior to construction and during the construction process to minimize or eliminate the chance of an illicit discharge. Existing facilities will be evaluated when determining the need for repairs or reconstruction and again during the design process for said reconstruction. The City's target for completion of an evaluation is within 30 days the determination being made. The following factors will be considered when making such assessments:

- Poor housekeeping practices
- Proximity to waterbodies
- The potential for polluting activities outside of the facility
- Identification of improperly stored materials
- Pollutants stored at the site, such as metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, etc. **ITEM 63.**

E. All fleet maintenance is conducted inside the DPW building. Storage of any possible pollutants is also kept indoors. The salt storage facility has no drainage structure nearby with a direct connection to the MS4. Mr. Kevin Sargent is the director of the facility.

F. For potential pollutants listed above, the means of handling and storage for each facility is as described in the PIPP/SOP for the Department of Public Services garage and yard. The following materials are stored and/or dispensed outside of the DPW garage:

Waste Oils, Diesel Fuel, Gasoline, Salt. **ITEM 66.**

G. As a means of minimizing pollutant runoff of the materials identified above, good housekeeping practices are consistently enforced by senior staff. All materials other than gasoline, diesel fuel and salt are kept indoors and are stored in appropriate containers which are regularly checked for soundness. Absorbent spill material is easily available to minimize the likelihood of any pollutant entering the floor drain system, which leads to the sanitary sewer system. **ITEM 67.**

- H. All storm drains at the DPW facility are to be inspected monthly to ensure the sumps are clear and no material has collected within the storm system. At 6 month increments, on site storm sewers shall be vactored out if necessary to ensure sediment does not enter the MS4. Fuel tanks are inspected every 6 months to ensure soundness of the triple walled tanks. During cold weather months and especially when the salt shed is in use, daily maintenance is undertaken, and all salt is shoveled or broomed into the salt storage facility. The waste oil depository is to be thoroughly checked for leaks and soundness and cleaned thoroughly. The site is checked daily for spills and will be checked monthly for any potential pollutant runoff. **ITEM 68.**
- I. The High ranked facilities will have a routine and comprehensive inspection schedule. Routine inspections will occur monthly and will include inspections of the salt storage area, gasoline and diesel storage area, oil storage area, and structural storm water controls. Comprehensive site inspections will be conducted once every 6 months and will inspect all of the areas in a routine inspection as well as review documentation of routine inspections and any follow-up investigations triggered by an inspection. Forms can be found as an attachment to the DPW SOP.
- J. Low potential sites parking areas will be cleaned by street sweepers on a regular basis and during winter months, salt will be applied sparingly to minimize introduction of salt to the MS4. Dumpsters will be monitored for leakage and no outside storage will be permitted. School Parking lots will be swept two times per year.

Parklands are to be mowed with mulching mowers during summer hours so grass clippings are less likely to enter the MS4. Waterfowl heavily populate park areas near open drains causing the introduction of fecal pollutants that continue to represent a problem outside the control of the City. **ITEM 70.**

IV Structural Storm Water Control & Maintenance Activities

- A. The City does not currently maintain a regular prioritization schedule for catch basin cleaning, but regularly inspects based on the daily observations of trained staff, historical problem areas and citizen complaints. All newly constructed drainage structures will be added to the City's GIS system and EGLE will be notified within 30 days upon completion of associated as-built plans. **ITEM 71.**
- B. The cleaning of a catch basin is required when its sump is found to be more than 50% full. Catch basin and inlet cleaning will be accomplished by utilizing a vactor truck to remove all settled materials in the bottom of each structure. If necessary, the storm sewer upstream and/or downstream may be cleared using the vactor if found to have any amount of siltation within the pipe. Care must be taken not to introduce flow in the system during cleaning that may suspend solids present which may be washed downstream. The quantity of the contents removed should be measured and documented for future progress reporting. **ITEM 73.**

- C. Material removed during the cleaning process must be disposed of properly. Silt and other solids removed by the vacuor truck are deposited on the drying pad at the City's DPW yard for eventual transport to an appropriate licensed landfill. Liquids from the drying pad drain to a structure connected to the City's sanitary sewer system. As a result, no liquid from this process makes its way to the storm system. Logs are always kept of this process. **ITEM 74.**
- D. The City and Schools own and operate four "Stormceptor" chambers which are inspected every six months and are vacuored at a minimum once every year to remove any sediment build-up or other deleterious material from the lower chamber. Cleaning is done according to the manufacturers specifications per the maintenance guide (attachment F). All material removed from the structures is disposed of following the procedures noted as per subsection C above, for Catch Basin cleaning & material disposal.
- E. Any new applicant-owned or operated facilities or new structural storm water controls will be designed and implemented in accordance with the post- construction storm water runoff control performance standards and long-term operation and maintenance requirements. **ITEM 76.**

V Municipal Operations & Maintenance Activities

- A. Maintenance procedures have the potential to discharge pollutants to the MS4 as follows: **ITEM 77**
 - 1. Roads, parking lots and sidewalks may be responsible for introduction of salt or patching materials that deteriorates over time. The City's regular sweeping program ensures any discharge is kept to a minimum. Salt use is kept to a minimum to limit introduction into the MS4. Cold patch is sparingly applied and compacted to lessen the likelihood of the material eroding and finding its way into the MS4.
 - 2. Right-of-way maintenance typically will involve only mowing operations. The City endeavors to keep all grass clippings in mown areas or rake and collect them for proper disposal and never blow clippings into paved areas where they may be washed into the MS4.
 - 3. The City has very few un-paved roads which are lightly travelled. Un-paved road maintenance involved road grading and application of dust control chemicals. Salt is typically not used for ice and snow control on un-paved roads. Sand is lightly applied in lieu of salt and may settle into adjacent road ditches. Since there are few finely graded components in the material used and the road ditches are vegetated, no suspended material is introduced into the City's MS4.
 - 4. Cold weather operations entail plowing, slagging (unpaved roads only) and salting. Snow removal from some City parking lots is taken to a City park and allowed to melt over time. Melt water is allowed to follow natural drainage courses across vegetated areas allowing suspended material to settle. Salt is applied as sparingly as possible during wintery weather but as is needed to allow safe travel. Typically, salt is spread only on major roads and at intersections. School Trucks are fitted with spreaders and loaded at the City salt Barn as needed for deicing operations.

5. Each fall, prior to the snow season, the City's and School District's fleet of plows/salt spreaders are readied for use in the coming winter. Salt spreaders settings are inspected and output is gaged to be certain salt output matches the spreader's settings. Spreaders are typically set on setting #2 out of 10 in an attempt to minimize the use of salt.
 6. On unpaved roads, sand is spread in lieu of salt during snow events. Sand is applied manually out of the bucket of a front-end loader strictly on an as-needed basis and as sparingly as possible.
 7. Vehicle washing operations are conducted at automated, privately owned car-washes for police and departmental vehicles and inside the DPW garage for DPW trucks or other heavy equipment. All associated runoff is collected in the garage drain. School mowing equipment is blown off in green belt area on site. No material is washed into the MS4.
- B.** Street sweeping occurs on a regular basis between March and December the day after trash collection for the City streets and city owned parking lots. The School District has all district property parking lots swept two times per year. Since no prioritization is followed for street sweeping, there is no map available for this question. In lieu of a map, an example of the City's route schedule has been attached (Attachment G). **ITEM 78 AND 79.**
- C.** The City operates a 2015 Elgin Whirlwind street sweeper which follows the regular street sweeping schedule and typically occurs the day after trash collection. Leaf pick-up generally occurs from the beginning of November until late December but is weather dependent. The City utilizes leaf vacuators for leaf collection which is followed by the street sweeper to collect the remaining debris. The sweeper filters the air to remove airborne pollution after dumping the debris into the dump body. All City owned parking lots are swept a minimum of 4 times per year and all School parking lots 2 times per year **ITEM 80.**
- D.** The contents of the street sweeper are deposited on the drying pad in the DPW yard. Leaf pick-up follows the same procedure with all contents remaining until everything is completely dewatered. The drying pad is designed so all wastewater from material deposited at the DPW drying pad enters the sanitary system. Once dewatered and when there is a significant quantity to warrant it, material is loaded and hauled to an appropriate landfill for disposal. **ITEM 81.**

VI Managing Vegetated Properties

Pesticide application is provided by employees with appropriate licenses. All employees have licenses in 3A, 3B and 6 categories and one employee carries a 5 license for applications near aquatic features. Pesticides are always applied sparingly and never near waterways or storm drains. Licensees receive continuous education as needed to maintain licensure. **ITEM 82.**

VII Contractor Requirements and Oversight

Bid and contract documents for all work to be completed by a hired contractor contain a document titled "Special Provision for Storm Water Management" that requires strict adherence to soil erosion and sedimentation control practices.

In addition, contractors hired to provide such services as lawn mowing, sewer cleaning & vactoring or pipe lining are made aware of the City's standard operating procedures and best management practices as relates to the MS4 and are made aware that those protocols must be adhered to. A pre-construction conference is typically held at which time the contractor is instructed in use of BMP's to ensure no contaminants are introduced into the MS4. **ITEM 83.**

VIII Employee Training

All new and current City and School employees involved in implementing or overseeing the pollution prevention and good housekeeping program are trained at a minimum once during the permit cycle in the proper techniques, disposal methods and safeguards required to limit or eliminate the likelihood of a spill of any petroleum product, pesticide, fertilizer or any other potential pollutant, new employees are trained during the first year of hire. Additional training is provided by senior staff every six-months or yearly, or at seminars when possible. Training will be documented using sign-in sheets which also identify the training administered **ITEM 84.**

Total Maximum Daily Load Implementation Plan

- A. *Blakely Drain* – TMDL for sediment. This drain lies west of the city's westernmost boundary, but the City has 4 outfalls from individual residences. The terrain is relatively flat and heavily vegetated.

Frank & Poet Drain – TMDL for sediment. Numerous outfalls contribute to this drain within City limits. Rear yards of residential properties are considered to be a low priority as most yards are well vegetated and unlikely to contribute to a sediment TMDL. Road basins upstream of an outfall and basins located in park areas will be checked to be certain sumps are cleared of sediment and debris on a regular basis. Denuded areas within parklands must also be re-vegetated. This represents a high priority. Larger diameter outfalls with sediment build-up may require cleaning.

Detroit River - TMDL for E-Coli. The City has strict policies requiring pet owners to clean up after pets and not leave fecal matter in public parks. A plan for reducing the population of water fowl in parklands is being considered. The City has no active septic fields and all CSO's were eliminated during the sewer separation program, so no other possible sources of E-Coli are evident. **ITEM 86.**

- B. *Sediment TMDL* - A visual inspection is to be conducted at six-month intervals for high risk outfalls of the Frank & Poet Drain. The inspections are to ensure catch basin sumps remain clear of sediment and debris and areas near stream banks or within the park are vegetated. Inspections of outlet pipes are to be conducted yearly to check for sediment build-up. Low priority areas will be checked periodically for vegetation growth.

E-Coli - Signage in parklands will be maintained to advise pet owners of ordinances requiring all pet wastes are removed. Periodic checking of trail & RV sanitary waste stations will be instituted to be sure proper procedures are followed. **ITEM 87.**

BMP'S at City Owned, Low or Moderate Risk Areas

1. For City Hall, Public Safety, the Kennedy Recreation Center, the Library and Westfield Center and all park areas, parking areas will be cleaned by street sweepers on a monthly basis. Storm structures will be inspected and cleaned over a five year period.
2. During winter months salt is applied sparingly to minimize introduction of salt to the MS4.
3. Dumpsters are monitored for leakage when emptied. No outside storage is permitted.
4. Parklands are mowed with mulching mowers during summer hours so grass clippings are less likely to enter the MS4.
5. Waterfowl that populate park areas near open drains cause the introduction of fecal pollutants that continue to represent a problem. The City will endeavor to undertake and document the following steps to decrease the impact of waterfowl on the Frank & Poet Drain:
 - Eliminate nests and nesting areas in parklands. Inspect and take corrective action weekly from February thru April.
 - Post and strictly enforce "Do Not Feed the Waterfowl" signs in areas typically populated by waterfowl.
 - Place predatory decoys and rotate at least every week.
 - Employ trained dogs to disperse geese as often as is feasible.

ITEM 87

C. Monitoring Plan

The purpose of the TMDL monitoring plan is to evaluate the applicable TMDLs that may be discharging into the waters of the State from City & Nested School owned outfalls.

- The applicable TMDLS for Trenton include sediment (TSS) in the Blakely Drain-Marsh Creek and the Frank and Poet Drain, and E. coli in the Detroit River. The Blakely Drain-Marsh Creek and the Frank and Poet Drains are tributaries to the Detroit River.
- The TMDL Monitoring Plan is for assessing the effectiveness of the BMPs to be implemented, in making progress toward achieving the TMDL pollutant load reduction requirement for TSS and E. coli, including a schedule for completing the monitoring, is as follows:
 - Outfall Monitoring for the pollutant TSS identified in the TMDL(s) for Blakely Drain-Marsh Creek and the Frank and Poet Drain and Outfall Monitoring for the pollutant E. coli identified in the TMDL for Detroit River

- will be conducted two times during the permit cycle, with the second set of sampling to occur in permit year four.
- Effectiveness of the TMDL BMPs will be reviewed following year four sampling with a review of BMPs implemented to determine if changes are necessary. Fifty percent (50%) of the City of Trenton outfalls entering the Blakely Drain-Marsh Creek, Frank and Poet Drain, and Detroit River will be collected. Two grab samples at each designated outfall during wet weather will be collected within 30 to 60 minutes of the start of a wet weather event (precipitation event that produces at least 0.25" of rain over a 24-hour period) to capture the first flush and will be delivered to Laboratory for analysis same day. Specific Outfall selection will occur in year one after Permit issuance, with a Map identifying the locations submitted to EGLE to insure the selected Outfalls are representative of the watershed. Sampling will occur at these same selected outfalls for both rounds of sampling. If lab report results show E. coli or TSS exceeding the benchmark (1000 cts/100ml for E. coli and 80 mg/L for TSS, respectively) the City will perform additional testing in dry and wet weather and perform investigations to determine the possible causes and or sources contributing to the elevated pollutant loading. **ITEM 88**

ATTACHMENT B

CITY OF TRENTON, MICHIGAN 48183

Non-Structural Best Management Practices Schedule

	BMP ACTIVITY	MEASURABLE GOAL	MEASURE OF ASSESSMENT	SCHEDULE OF IMPLEMENTATION	FREQUENCY
CITY OF TRENTON	Provide a copy of Trenton's SWMP on the City web page for public review and comment. Include information of the SWMP with municipal water bills and/or in "The Buzz", the local bi-yearly document printed by the Trenton Recreation Department	Looking for 50 - 100 website hits per calendar year	Note number of persons viewing the SWMP and how many provide comments	To be implemented 2 weeks after permit is issued by EGLE	The web page is to be examined yearly and updated annually. The web page is to be reviewed for effectiveness biennially
	Provide an e-mail link to allow public input and comment on Trenton's SWMP. The name(s) and contact information of which staff member(s) will be responding to comments, where necessary, will be provided	Approximately 25 responses per year	Examine the number and time lag between receipt of the comment and resolution		
	Identify all events within the City of Trenton such as volunteering for work at the Humbug Marsh or working with the Friends of the Detroit River. Provide a link or other contact information to each group responsible for an event.	Attempt to add an additional event per calendar year	Examine how many responses are received each year and how well events are attended	To be implemented within 6 months after permit is issued by EGLE	Update and revise as is necessary
	Maintain and update any documents, information boards and pamphlets at City Hall, the Kennedy Ice Arena, the Library and the DPS that provides public education and opportunities for public input. Pursue collaborative work with other nearby organizations	Add and update 2 educational documents at each location per year. Add at least one collaborative partner within the duration of the NPDES permit	Determine that the revisions and updates to documents reflect the current state of operations sought by Wayne County and EGLE		Update and revise as is necessary

CITY OF TRENTON
FACILITY LIST WITH STRUCTURAL CONTROLS

FACILITY	ADDRESS	CITY	SUBBASIN/ OUTFALL	IDEP PRIORITY	STRUCTURAL CONTROLS	DYE TESTED
Trenton Department of Public Services	1431 West Rd.	Trenton	Ditch on east side of DPS & Railroad grade on west side/ Detroit River	HIGH	1. Salt Barn 2. Secondary Containment 3. Fuel Farm 4. Dumpsters 5. Stock Pile 6. # Storm Structures/Catch Basins 23	
Kennedy Aquatic Center	3101 West Rd.	Trenton	FP-15 & FP-16	LOW	N/A See Kennedy Rec Center shared parking lot	
Kennedy Recreation Center/ Ice Arena	3101 West Rd.	Trenton	FP-15 & FP-16	LOW	1. Underground Detention / Stormceptor 2. # Storm Structures/Catch Basins 16	
Trenton City Hall	2800 3rd St.	Trenton	DT-15	LOW	1. # Storm Structures/Catch Basins 8	
Trenton Department of Public Safety	2872 W. Jefferson Ave	Trenton	DT-15	LOW	1. # Storm Structures/ Catch Basins 1	

CITY OF TRENTON
FACILITY LIST WITH STRUCTURAL CONTROLS

FACILITY	ADDRESS	OWNER	SUBBASIN	IDEP PRIORITY	STRUCTURAL CONTROLS	DYE TESTED
Trenton Library/ Administration	2790 Westfield	Trenton	Combined Downriver Watershed/ Frank & Poet FP-22	LOW	1. # Storm Structures/ Catch Basins 6	
Trenton Cultural Center	2427 West Rd.	Trenton	FP-12	LOW	1. # Storm Structures/ Catch Basins 1	
Westfield Center	2700 Westfield	Trenton		LOW	N/A	
Trenton Fire Hall No.2	1989 King Rd.	Trenton		LOW	N/A	
Affholter Park	E. of Lodge Ln., N of West Rd.	Trenton	BD-4 - Blakely Drain	LOW	1. # Storm Structures 2	N/A
Haas Park	S. of Sibley, @ Washington Ave.	Trenton		LOW	N/A	N/A
Kennedy Park	Located @ Kennedy Recreation Center	Trenton		LOW	N/A	N/A
Lathrop Park	E. of Lathrop, midway bet. Van Horn & Toledo	Trenton		LOW	N/A	N/A
Lexington Park	N. of Van Horn along Frank & Poet Drain	Trenton		LOW	N/A	N/A
Lions Park	N. of Toledo, E. of Julie Dr.	Trenton		LOW	N/A	N/A
MacArthur Park	N. of West Rd., W. of Newman Dr.	Trenton		LOW	N/A	N/A

CITY OF TRENTON
FACILITY LIST WITH STRUCTURAL CONTROLS

FACILITY	ADDRESS	OWNER	SUBBASIN	IDEP PRIORITY	STRUCTURAL CONTROLS	DYE TESTED
Meyer Ellias Park	E. of W. Jefferson, N. of Helen	Trenton		LOW	N/A	N/A
North McLouth Park	Bet. Harrison and King Rd., @ Frank & Poet Drain	Trenton	FP-33A	LOW	1. # Storm Structure 1	
Rotary Park	S. of Harrison, E. of Riverside	Trenton	Trenton Channel DT-15	LOW	1. # Storm Structure/ Catch Basins 5	
South McLouth Park	Bet. Harrison & West Rd., @ Frank & Poet Drain	Trenton	FP-23 & FP-24	LOW	1. # Storm Structure/ Catch Basins 2	
Slocum – Truax Park	S. of Harrison, bet 3rd & 5th	Trenton		LOW	N/A	
Tefend Park	N.W. of Fort St off of Tomson St.	Trenton		LOW	N/A	
Teifer Park	N. of Clyde, E. of William R.	Trenton	DT-4	LOW	1. # Storm Structure/ Catch Basins 2	
Williamson Park	Adjacent to the Frank & Poet Drain off Coucy Ave.	Trenton		LOW	N/A	
Police Storage & Gun Range	1401 West Rd.	Trenton	Railroad Grade on west side/ Detroit River	MEDIUM	1. # Storm Structure/ Catch Basins 3	
Elizabeth Park Pump Station	3501 West Jefferson	Trenton		LOW	N/A	
Jefferson Pump Station	4735 West Jefferson	Trenton		LOW	N/A	
Brookview Pump Station	East end of Brookview	Trenton		LOW	N/A	
George St. Pump Station - Storm water	East end of George	Trenton	DT-18	LOW	1. # Storm Structure/ Catch Basins 1	

CITY OF TRENTON
FACILITY LIST WITH STRUCTURAL CONTROLS

FACILITY	ADDRESS	OWNER	SUBBASIN	IDEP PRIORITY	STRUCTURAL CONTROLS	DYE TESTED
Van Horn Pump Station	4539 Fort St.	Trenton		LOW	N/A	
Third St. Parking Lot	Third St. & Maple	Trenton	DT-15	LOW	1. # Storm Structure/ Catch Basins 3	
Elm St. Parking Lot	Elm & West Jefferson	Trenton		LOW	N/A	
Birchwood Parking Lot	Birchwood & West	Trenton	FP-20	LOW	1. # Storm Structure/ Catch Basins 1	
Arthurs Court Sub	1632 Arthurs Ct	Trenton	DT-13	Low	1. Underground Detention / Stormcepter 2. # Storm Structures/ Catch Basins 19	
Parkside	Harrison & Edsel - SE corner	Trenton		LOW	N/A	
Bloomdale Cemetery	King Rd. west of Jefferson	Trenton		LOW	N/A	
Masonic Cemetery	Jefferson & 5th	Trenton		LOW	N/A	
Syckelmoore Tot Lot	Syckelmoore & Marian	Trenton		LOW	N/A	
Cora Tot Lot	Cora & Longmeadow	Trenton		LOW	N/A	
Fox Ct. Tot Lot	Fox Ct. & Van Horn	Trenton		LOW	N/A	
Water Bldg.	121 King Rd.	Trenton		LOW	N/A	
Resident Recycling Drop-off / Transfer Facility	1801 Van Horn Rd.	Trenton	DT-1	NA	1. Waste Oil Holding Tank 2. All Structures On Site Enter Sanitary Sewer System / DOES NOT DISCHARGE TO MS4	YES- Verified all structures to discharge to Sanitary Sewer System / WWTP

TRENTON PUBLIC SCHOOLS
FACILITY LIST WITH STRUCTURAL CONTROLS

FACILITY	ADDRESS	CITY	SUBBASIN	IDEP PRIORITY	STRUCTURAL CONTROLS	DYE TESTED
Trenton High School / Board of Education Bldg.	2601 Charlton / 2603 Charlton	Trenton Public Schools	FP-24 & FP-20	LOW	Storm Structure/Catch Basins <u>53</u>	
Arthurs Middle School / Maintenance Building	AMS-4000 Marian/Main. Bldg.-3940 Cora	Trenton Public Schools	FP-9	MEDIUM	Storm Structure/Catch Basins AMS <u>40</u> /Main.Bldg. <u>14</u> . Storm Treatment Structure (TS4) at Maintenance Bldg.	
Anderson Elementary School	2600 Harrison	Trenton Public Schools	FP-30	LOW	Stormtech SC-740 underground detention system Storm Structure/Catch Basin <u>12</u>	
Hedke Elementary School	3201 Marian	Trenton Public Schools	FP-9	LOW	Stormtech SC-740 underground detention system Storm Structure/Catch Basin <u>16</u>	

NOTES

BENCH MARKS



PUBLIC OR PRIVATE UTILITIES AS SHOWN ON THESE DRAWINGS ARE NOT GUARANTEED AS TO ACCURACY FOR LOCATION OR DEPTH.
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DATE	REVISIONS



CITY OF TRENTON
 WAYNE COUNTY, MICHIGAN
 ENGINEERING & BUILDING DEPARTMENT
 2800 THIRD STREET - TRENTON, MI 48188
 PHONE - (734) 675-6251 FAX - (734) 675-4504
 CITY ENGINEER - WILLIAM R. HOGAN, P.E.

OWNER BY	DATE
WM	02-03-2020
DESIGNED BY	DATE
NA	02-03-2020
APPROVED BY	DATE
DJC	02-03-2020

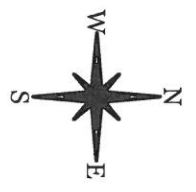
FILE NAME: 2020 MS-4 PERMIT
 SCALE: Not to Scale

Storm Outfall Locations

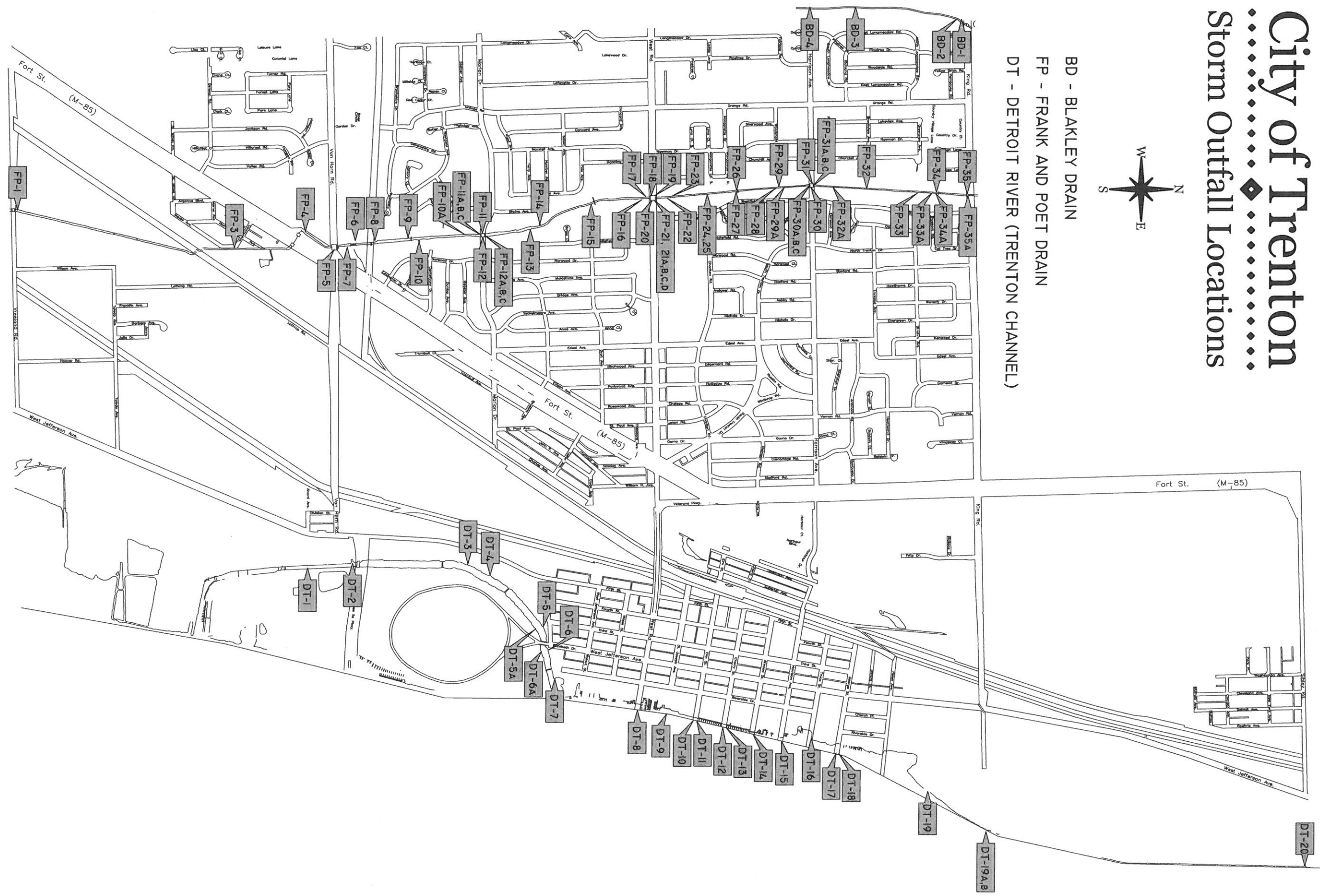
PROJECT No.
 2020 MS-4 PERMIT
 SHEET
 1 OF 1

City of Trenton

Storm Outfall Locations






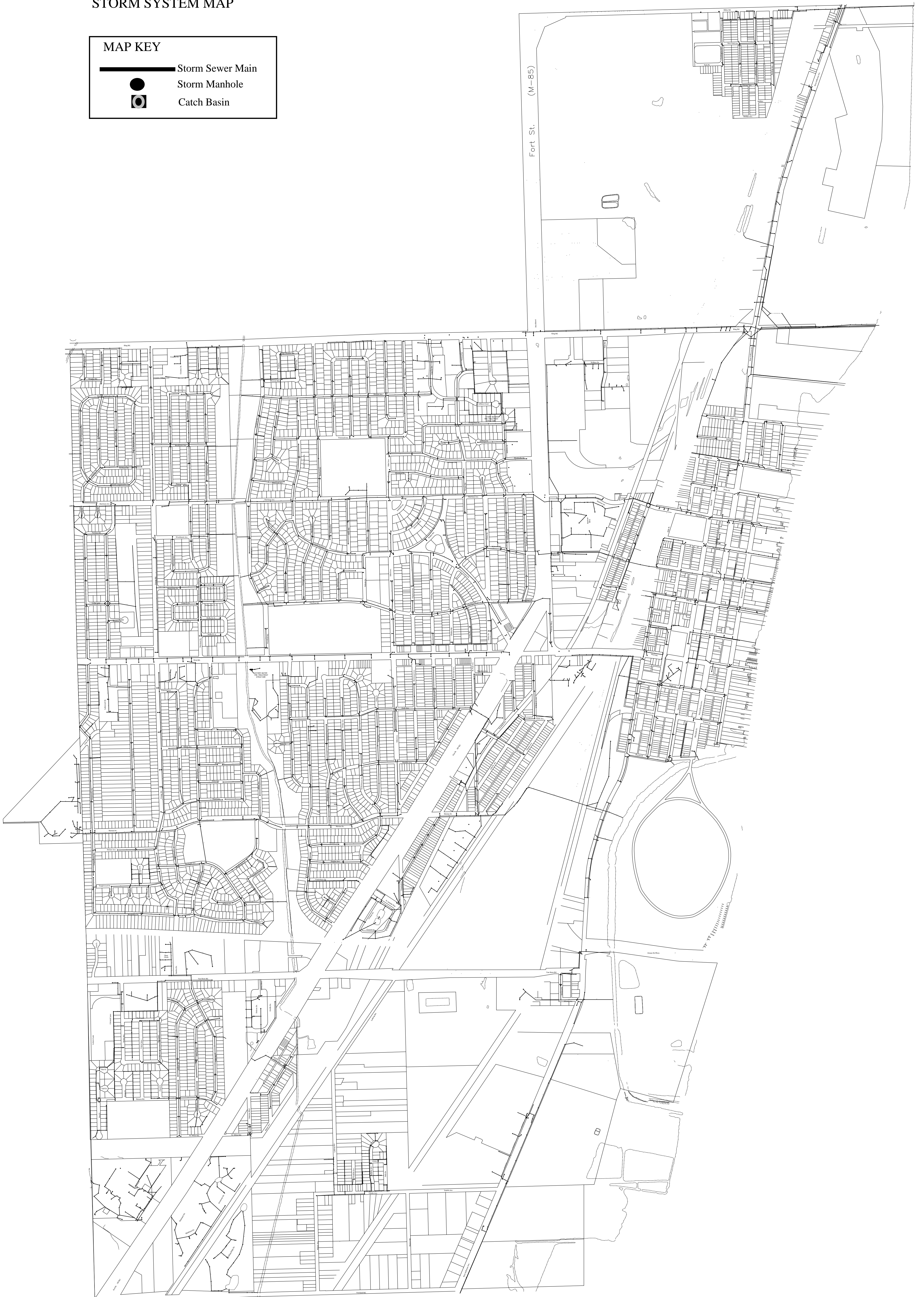
BD - BLAKLEY DRAIN
 FP - FRANK AND POET DRAIN
 DT - DETROIT RIVER (TRENTON CHANNEL)

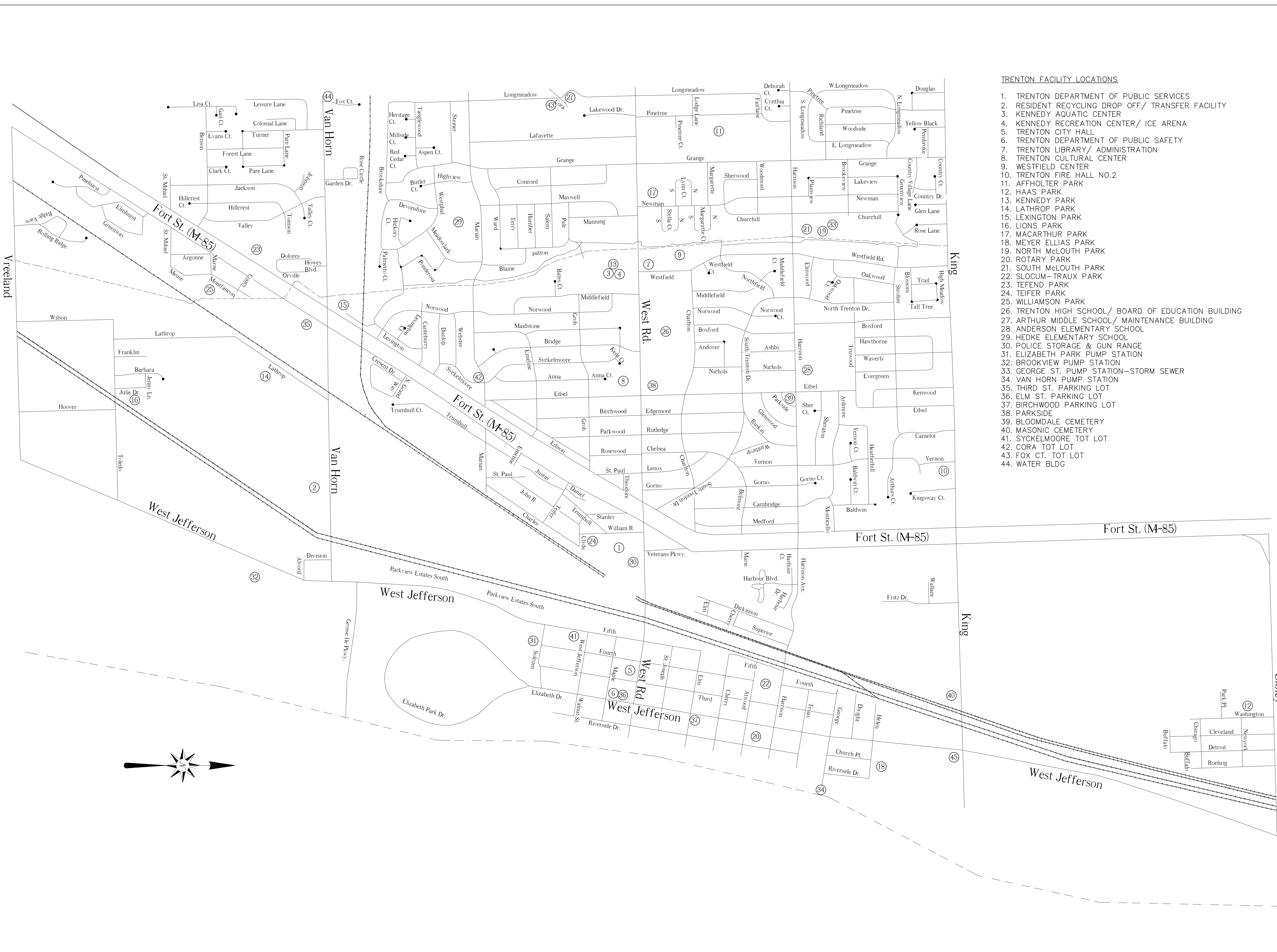


CITY OF TRENTON
STORM SYSTEM MAP

MAP KEY

-  Storm Sewer Main
-  Storm Manhole
-  Catch Basin





TRENTON FACILITY LOCATIONS

1. TRENTON DEPARTMENT OF PUBLIC SERVICES
2. RESIDENT RECYCLING DROP OFF/ TRANSFER FACILITY
3. KENNEDY AQUATIC CENTER
4. KENNEDY RECREATION CENTER/ ICE ARENA
5. TRENTON CITY HALL
6. TRENTON DEPARTMENT OF PUBLIC SAFETY
7. TRENTON LIBRARY/ ADMINISTRATION
8. TRENTON CULTURAL CENTER
9. WESTFIELD CENTER
10. TRENTON FIRE HALL NO.2
11. AFFHOLTER PARK
12. HAAS PARK
13. KENNEDY PARK
14. LATHROP PARK
15. LEXINGTON PARK
16. LIONS PARK
17. MACARTHUR PARK
18. MEYER ELLIAS PARK
19. NORTH McLOUTH PARK
20. ROTARY PARK
21. SOUTH McLOUTH PARK
22. SLOCUM-TRAUX PARK
23. TEFEND PARK
24. TEIFER PARK
25. WILLIAMSON PARK
26. TRENTON HIGH SCHOOL/ BOARD OF EDUCATION BUILDING
27. ARTHUR MIDDLE SCHOOL/ MAINTENANCE BUILDING
28. ANDERSON ELEMENTARY SCHOOL
29. HEDKE ELEMENTARY SCHOOL
30. POLICE STORAGE & GUN RANGE
31. ELIZABETH PARK PUMP STATION
32. BROOKVIEW PUMP STATION
33. GEORGE ST. PUMP STATION-STORM SEWER
34. VAN HORN PUMP STATION
35. THIRD ST. PARKING LOT
36. ELM ST. PARKING LOT
37. BIRCHWOOD PARKING LOT
38. PARKSIDE
39. BLOOMDALE CEMETERY
40. MASONIC CEMETERY
41. SYCKELMOORE TOT LOT
42. CORA TOT LOT
43. FOX CT. TOT LOT
44. WATER BLDG

NOTES

BENCH MARKS



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DATE	REVISIONS



CITY OF TRENTON
WAYNE COUNTY, MICHIGAN
 ENGINEERING & BUILDING DEPARTMENT
 2800 THIRD STREET - TRENTON, MI 48183
 PHONE - (734) 675-8251 FAX - (734) 675-8504
 CITY ENGINEER - WILLIAM R. HOGAN, P.E.

DRAWN BY	DATE
DESIGNED BY	DATE
APPROVED BY	DATE
FILE NAME	

SCALE: NO SCALE
TRENTON CITY MAP

TRENTON FACILITY LOCATIONS

PROJECT No.
 TR-16
 SHEET
1 OF 1

Attachment C

City of Trenton, Trenton Public Schools Property in Acres

Trenton High School- 2601 Charlton Rd.	34.99 acres
Arthurs Middle School- 4000 Marian Dr.	28.11 acres
Anderson Elementary School- 2600 Harrison Ave.	23.38 acres
Hedke Elementary School- 3201 Marian Dr.	<u>18.36 acres</u>
	104.84 Total acres

Outfall ID:		Community: CITY OF TRENTON	
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 <input type="checkbox"/> Brown/ Tannic <input type="checkbox"/> Muddy <input type="checkbox"/> Other _____		
	<input type="checkbox"/> Petroleum		
Floatables (not including trash)	<input type="checkbox"/> Paint (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 Material <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			

City of Trenton
Department of Public Works Facility

STANDARD OPERATING PROCEDURES

Pollution Incident Prevention Plan

June 2022

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Chapter 1: General Facility Information

Table 1: General Facility Information

NAME OF FACILITY:	Trenton Department of Public Works (DPS) Facility
FACILITY ADDRESS:	1411 West Road, Trenton, MI 48183
FACILITY CONTACT INFORMATION	
Name and Title:	Kevin Sargent
Mailing Address:	1411 West Road, Trenton, MI 48183
Telephone:	734-675-8470
Email:	ksargent@trenton-mi.com
SPILL PREVENTION AND CONTROL COORDINATOR	
Name and Title:	Steve Mocerri
Telephone:	734-675-8251
Email:	smocerri@trenton-mi.com
24-Hour Emergency Telephone:	734-676-1313 (Fire Department)

Chapter 2: Spill Response Team

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

Table 2: Spill Response Team

NAME AND TITLE	RESPONSIBILITY
Dennis J. Chegash, Assistant City Engineer	Stormwater Program Oversight
Kevin Sargent, Department of Public Services Superintendent	Spill Response Coordinator, Oversight of Day-to-Day
Steve Mocerri, Motor Pool Supervisor	Onsite Vehicle Maintenance, Routine Inspections.

Chapter 3: Site Map

The Trenton DPS Facility consists of aggregate, sand, topsoil and cold-patch storage piles, a fueling station, a dewatering bed, a salt shed, a covered storage shed, two trailers, a Pole Barn, Steel Building and the DPS Maintenance Garage. The descriptions of stormwater flow through these areas are as follows:

1. Aggregate, Sand, Topsoil and Cold-Patch Storage Piles

Several different types of material are stored inside in a pervious gravel area of the DPS yard. There are no catch basins in the gravel area of the lot. Stormwater either infiltrates into the ground, or occurs as sheetflow towards the south end of the property and infiltrates along the railroad easement, which is heavily vegetated.

2. Fueling Station

The DPS yard has two above ground 6,000 gallon double-walled tanks for gasoline and diesel storage and use. These tanks are covered with a solid roof with spill prevention measures in place. The closest storm drain has a solid manhole covering to prevent any potential spills from reaching the storm drain.

3. Dewatering Bed

A dewatering bed has been created for the decanting of liquids from catch basin cleanings and street sweeping material. This bed consists of a concrete pad with cement curbing that drains directly to the sanitary sewer. All decanted liquid enters the sanitary system. The solid material is then hauled to a landfill for proper disposal.

4. Salt Shed

The Salt Shed has the capacity to hold 1,200 tons of aggregate salt and rests on a concrete pad with a 4' concrete wall, wooden walls that stretch from the cement footing to the shingled roof, and downspouts that direct stormwater away from the open door to the shed. All stormwater runoff is directed to a vegetated area just south of the shed. There are no storm drains near the Salt Shed.

5. Covered Storage Shed

The Covered Storage Shed consists of a gravel floor and metal walls to provide for equipment storage. This covering protects equipment from coming into contact with stormwater. The Covered Storage Shed has no interior floor drains.

6. Trailers

There are two trailers on site in the DPS yard. One stores City holiday decorations, while the other belongs to the local Boy Scout troop and stores scout supplies. No materials stored inside these trailers could lead to stormwater pollution.

7. Pole Barn

The Pole Barn rests on a concrete pad and stores equipment to prevent contact with stormwater. The interior floor drains of the Pole Barn are connected to the storm system, however drip pans are used to capture any equipment leaks and a spill kit is stored inside this building to prevent spills from entering the storm sewer system. All equipment is washed prior to its storage in the pole barn.

8. Steel Building

This building has metal walls and a concrete floor that stores bagged salt on pallets and provides for equipment storage. The interior floor drains are connected to the storm system, however drip pans are used to capture any equipment leaks and a spill kit is stored inside this building to prevent spills from entering the storm sewer system.

9. DPS Maintenance Garage

The DPS Maintenance Garage houses city vehicles, vehicle fluids, and is a site for vehicle and equipment maintenance operations. The interior floor drains are connected directly to the sanitary sewer.

Chapter 4: Material Inventory

Inventory and Description of Polluting Materials

To identify potential sources of significant materials, City staff, with the assistance of the Southeast Michigan Council of Governments (SEMCOG) conducted an inventory of municipal buildings, activities and materials that may be identified as polluting materials under Part 5 at the City of Trenton DPS facility. The MSDS for all materials are located inside the DPS Maintenance Office. The polluting materials stored onsite requiring a PIPP include the following:

Material Name	Quantity Stored	Location
Salt in aggregate, solid form	1,200 tons	Salt Shed
Fuel (gasoline, diesel)	6,000 gallons (gasoline) 6,000 gallons (diesel)	Each tank is located aboveground
Oil	1,350 total gallons Of the following: (2) 275-gallon tank 15W40 (1) 275 gallon tank AW-46 (1) 250 gallon tank used oil (7) 55 gallon drums of a combination of 30W oil, tractor oil, 10W40, 10W30	Inside the maintenance garage

Salt Storage & Vehicle Wash Description

The City of Trenton DPS Facility stores road salt inside a covered Salt Shed on the south side of the Property. The shed has a concrete floor, 4' cement walls that are topped with wooden slot walls, and a shingled roof. The Salt Shed roof also has a two foot overhang to provide covering for a loading area. The roof also has gutters with downspouts located on the corners of the shed. All downspouts are directed away from the front of the Salt Shed (to avoid picking up any potential excess salt from the loading area) which outlet to the vegetated area. The capacity of the shed is 1,200 tons. There are no interior floor drains inside the shed.

The Salt Shed is surrounded by a concrete loading area and DPS lot. Salt is delivered to the Trenton DPS Facility and is placed on concrete loading area just outside the shed. 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. Trenton staff immediately load all delivered salt into the shed using a front end loader. Employees are trained in the procedure to immediately sweep excess salt from track out or spills back into the shed to prevent stormwater runoff.

Salt is loaded into DPS trucks for usage just outside the Salt Shed. The two foot overhang provides cover for loading during precipitation events. A loader scoops material from inside the shed and loads each vehicle as it pulls in front of the Shed. Any spilled salt material is immediately swept back into the shed to prevent exposure to stormwater runoff.

City of Trenton DPS Maintenance Staff performs onsite maintenance for the vehicles and equipment used in the department, including the loader and dump trucks used for snow and salt activities. When problems occur, the vehicle drivers indicate the problems to the DPS Maintenance Staff. Maintenance is immediately scheduled on the vehicle. 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 DPS Facility is completely fenced with a gate that remains locked when not in use and during non-business hours.

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

Fuel Storage Description

The City of Trenton DPS stores gasoline and diesel fuel onsite in two above-ground storage tanks. Each tank is a 6,000 gallon double-walled metal tank with automatic leak detection monitoring devices. The gasoline stored onsite is Sunoco regular with 10% ethanol. The diesel stored onsite is HWY Dyed Diesel #2 15 MV. The leak detection system on the tanks monitors the interstitial space between the tanks on a monthly basis using a probe. It also provides automatic daily reads on the volume of material in each tank. These reads are evaluated for potential fuel losses, spills, and leaks. Each pump has automatic shut-off valves to stop the flow of fuel when the tank reaches capacity. The hoses on each pump are all breakaway hoses, to ensure that the hose will automatically detach during an emergency situation.

The tanks are located on a concrete pad with a shingled roof and surrounded by bollards.

There is a spill kit located at the fuel pumps to assist in smaller spills from everyday use.

There are also large amounts of sand on hand to create dikes in the case of a large emergency spill. A fire extinguisher is located at the pump, along with a well-labeled emergency stop button, located on the north-facing exterior wall of the Salt Shed.

The fuel tanks are loaded by a commercial hauler when quantities being to run low. The tanker fuel directly into the tank at a filling port, which has a secondary containment trough to capture leaks and small spills during loading activities.

Multiple city staff, use the DPS fuel pumps to fuel their vehicles including DPS, Trenton City Police and Trenton Fire staff.

Oil Storage Description

The City of Trenton DPS Facility has met the Part 5 requirements of designing, constructing, maintaining, and operating indoor storage areas for oil to prevent the release of polluting materials through sewers, drains, or otherwise directly or indirectly into any public sewer system on to the surface or groundwater's of this state through the proper storage and pollution prevention method currently in place. The vehicle fluid materials currently stored onsite include the following:

<u>PART NUMBER</u>	<u>DESCRIPTION</u>	<u>LOCATION</u>	<u>QUANTITY</u>	<u>UNIT</u>
#46 Hyd. Oil	Hydraulic Oil Chevron	Shop Wall	275	Gallons
15W40	Motor Oil Chevron	Shop Wall	275	Gallons
5W20	Motor Oil Chevron	Shop Wall	275	Gallons
Used Oil	Used Motor oil Generated onsite	Shop Wall	250	Gallons
Anti-Freeze	Full Strength Gal. Chevron Supreme	Shop wall	55	Gallons
Anti-Freeze Mix	50/50 Mix Gal.	Shop Wall	110	Gallons
ATF	Auto Trans. Fluid Chevron MD-3	Shop Wall	55	Gallons
Chevron 1000 THT	Tractor Hyd. Oil	Shop Wall	55	Gallons
Chevron 80W90	Gear Oil	Shop Wall	55	Gallons
Chevron MV	Rando HDZ ISO 22 Plow Oil	Shop Wall	55	Gallons

Chevron SAE 30	30 WT. HD Motor Oil	Shop Wall	55	Gallons
Delo 85W140	Gear Lube Qt. Synthetic	Parts Room	20	Gallons
Delo EP2 LB. Grease	Grease Lb.	Shop Wall	120	Lbs.
Delo ESI 85W40	Gear Lube Lb.	Shop Wall	56	Quarts
Havoline/DEX COOL	50/50 Antifreeze Extended Life	Shop Wall	55	Gallons
Chevron ATF	ATF Dextron III Mercon	Shop Wall	55	Gallons
Wind/Washer Solvent	Blue King Concentrate	Shop Wall	30	Gallons
Chevron SAE 30 HD	HD 30 TRANSOIL	Shop Wall	55	Gallons
ATI Purity	142 Solvent	Shop Wall	55	Gallons
Chevron 10W-30	Motor Oil Chevron	Shop Wall	55	Gallons
Chevron Gear Lube	80 W-90 Lube	Shop Wall	55	Gallons
Permalube	Grease	Shop Floor	360	Lbs.
Zep Solvent	Dyna 143	Shop Floor	55	Gallons

Truck Wash	Zep Touch Free Detergent	Wash Rack	55	Gallons
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All vehicle fluids are stored inside the DPS Maintenance Garage in clean, well-labeled containers. The interior floor drains of the Maintenance Garage discharge to the sanitary sewer. All interior floor drains are vacuored by City DPS staff approximately four times per year to help prevent material from entering the sanitary system.

All vehicle maintenance activities are tracked, with inspections performed on a routine basis. Preventative maintenance is performed on vehicles and equipment to help reduce costs and maintain a healthy fleet, while preventing potential spills and leaks of fluids.

- Storage of three (3) 275-gallon metal tanks of new oil inside the DPS Maintenance Garage.
Each of the three (3) 275-gallon metal tanks storing oil are single walled, but stored inside the Maintenance Garage and away from any interior floor drains. When new material is loaded into these tanks, the manufacturer drives the material into the DPS garage and pumps the material directly from truck inside the tank to minimize exposure of potential spills.
- Storage of one (1) 250-gallon metal tank of used oil inside the DPS Maintenance Garage.
The used oil tank stores the oil drained from oil filters that are changed in the Maintenance Garage along with the used oil drained from the motors during oil changes of City vehicles and equipment. The oil is drained into a holding port which is pumped into the used oil tank to minimize spills. When full, DPS staff contact Buck's Oil who is a licensed hauler contracted by the City to transport and dispose of the City's used oil material.
- Storage of 55-gallon drums of oil-based materials inside the DPS Maintenance Garage.
The 55-gallon drums are stored inside the Maintenance Garage, on secondary containment moveable pallets that capture drips, leaks, and spills. These pallets are emptied whenever leaks occur, although it is rather infrequently. All drums are labeled with clear, readable labels and a spill kit is located nearby to capture leaks or drips that occur on the garage floor to prevent trackout of material or discharge to the sanitary system.

Spill Response Procedures and Equipment

If the following materials are released to 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):	
Diesel	7 gallons	Salt, oil gas or diesel, any significant material	Any quantity that causes visible sheens, oil films, unnatural turbidity, foams or deposits in water body	Salt, gas, diesel, oil, any significant material	Any quantity not currently authorized by receiving WWTP
Gasoline	8 gallons				
Salt	50 pounds				
Oil (new or Used)	7 gallons				

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

Chapter 5: Routine Inspections

Preventive maintenance at the City of Trenton DPS 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 Trenton DPS 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 area, oil storage area, and fuel storage area. 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 the state. Good housekeeping procedures reduce the potential for pollutants to come into contact with the environment. A log of the routine inspections and corrective actions shall be maintained on file and shall be retained for three years. Comprehensive Site Inspections will occur at a minimum of once per 6 months for the whole facility. The Comprehensive Site Inspection shall include the areas and equipment identified in the good housekeeping procedures, a review of the Routine Inspection Forms, and any other paperwork associated with storm water at the Facility, as well as an assessment of good housekeeping and maintenance of the School District.

Chapter 6: Annual Plan Review

The completed SOP/PIPP requires that the City of Trenton will notify the EGLE Water Resources Division District Office within 30 days at:

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

City of Trenton will also notify the following agencies that the SOP/PIPP requirements have been completed:

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

Part 5 requires that the SOP/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 are included in the plan change (See **Appendix C** for SOP/PIPP Review Form).

Based on the three-year review, the City of Trenton DPS 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 Trenton DPS 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 Forms

Date:	Facility Name:
Inspector Name:	
Routine Inspection Schedule: Monthly	

Salt Storage Area

Check Box	Method	Comment/Action Taken
	Inspect roof of Salt Shed for holes and loose shingles. <i>(If defects are detected, schedule roof for necessary repairs.)</i>	
	Inspect the outside of the Salt Shed 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 shed for necessary repairs.)</i>	
	During salt deliveries, ensure staff is present to prevent salt from entering storm drains and to immediately load salt into bays. <i>Do not allow deliveries to stand outside of the barn uncovered.</i>	
	Inspect loading area for presence of salt. Ensure the approach area is swept regularly to contain trackout, and salt is returned for reuse (don't hose down the area.)	
	Perform an inspection of the loading equipment. Check for leaks, loose connections, and proper operations.	
	Ensure equipment and vehicles are washed in designated inside bay where the water goes to the sanitary sewer.	

Gasoline and Diesel Storage Area

Check Box	Method	Comment/Action Taken
	Inspect spill kit located at the pumps to ensure supplies are stocked and the kit is clearly accessible to employees.	
	Inspect fuel pump automatic shutoff valves to ensure they are working properly.	
	Inspect each tank for cracks, holes, or leaks. <i>(If present, repair immediately.)</i>	
	Inspect the ground surrounding each tank for presence of fuel or oily sheen. If found, identify source of the spill or leak and make repairs immediately.	
	Inspect the Vendor Root Monitoring System to ensure it is functioning properly.	
	Review Vendor Root monthly reports to ensure interstitial space for each tank remains free of leaks or spills.	
	Procedures are in place to have employees avoid topping off tank to prevent spills.	
	Employees are trained (or signs are posted) to report fuel leaks as soon as possible.	

Oil Storage Area

Check Box	Method	Comment/Action Taken
	Inspect garage for spill clean-up materials (<i>oil dry absorbent pads, oil dry, brooms, shovels, etc.</i>). Ensure supplies are stocked and clearly accessible to employees.	
	Inspect garage floors for debris (oil dry, etc.). Sweep floors as necessary and dispose of debris in dumpster (<i>floors are not hosed down</i>).	
	<i>Inspect fluid filling area for funnels. Ensure they are used when transferring fluids.</i>	
	Inspect each tank and drum containing oil for leaks or cracks (<i>make any needed repairs immediately</i>).	
	Inspect each tank and drum for clear, readable labels, including Used Oil tank and Used Antifreeze drum.	
	Inspect each tank and drum for fluid residue (use spill pads and absorbents to clean and prevent leaks).	
	Inspect the openings of each tank and drum to ensure all lids are kept closed at all times, except when filling.	
	Inspect the used oil filter container for leaks or cracks. Ensure no used oil is being spilled onto the ground nearby.	
	Inspect the fluid drum secondary containment pallets for presence of material. Ensure the pallets are emptied as needed to avoid overflow and to maintain capacity.	

Structural Stormwater Controls

Check Box	Method	Comment/Action Taken
	Inspect catch basin sumps and, if full, examine connecting sewers for siltation. <i>(Only required where storm sewer is present, not where structures connect to the sanitary system.)</i>	
	Where appropriate, check filter fabric in catch basin/inlet structures.	
	In paved areas, check for cleanliness of pavement/presence of particulates that may wash into storm sewer. Note when street sweeper last cleaned area/check for adherence to sweeping schedule.	
	Examine areas adjacent to property lines where storm water may sheet flow from site. Check for presence of vegetated strip or silt fence.	

Appendix B: Annual-Year PIPP Review Form

Date of Review:

Reviewer Name: <i>Please Print</i>	Signature:
-------------------------------------------	-------------------

1) Facility general information and Spill Response Team information is current and accurate.	Yes	No
2) Site Map is current 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
9) Ensure Material Safety Data Sheets are up-to-date and available for all chemicals onsite.	Yes	No
10) Review of Structural Stormwater Controls	Yes	No

Additional Comments:

Appendix C: City of Trenton DPS Facility Spill Response Plan

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

Agency Name	Phone Number
Local Fire Department	
Emergency	911
Nonemergency	1-734-676-1315
Police	
Emergency	911
Nonemergency	1-734-676-3737
Wayne County Environmental Health Department	
Nonemergency	1-734-727-7400
U. S. Coast Guard	
National Response Center	1-800-424-8802
Environment, Great Lakes and Energy (Formerly MDEQ)	
<u>8:00am – 5:00pm</u> Southeast District Office	1-586-753-3700
<u>After Hours:</u> PEAS Hotline	1-800-292-4706
Marine Pollution Control	
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 hazardous spills).	1-313-849-2333 1-800-521-8232
Waste Water Treatment Plant	
For spills into the sanitary system, contact the local WWTP	1-734-676-0646 or 1-734-675-5381 (after hours)

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: Kevin Sargent at 1-734-341-8802.
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

- ✓ **5 lb. floor dry**
- ✓ **1 – Shovel**
- ✓ **1 – Broom**
- ✓ **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: Kevin Sargent at 1-734-341-8802.
8. Clean up spilled material/absorbent (do not flush with water). If outside clean-up services 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

- ✓ **20 lb. Floor Dry**
- ✓ **1 – Shovel**
- ✓ **1 – Broom**
- ✓ **Absorbent Pads**
- ✓ **Container for clean-up (30 gallon)**

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 Kevin Sargent @ 734-341-8802 to make him aware of the spill and potential dangers. Notify police And fire departments if necessary for possible lane closure and need for assistance.

LARGE SPILLS ARE LIKELY TO PRESENT A HAZARD AND WILL REQUIRE SPILL RESPONSE SERVICES FROM MARINE POLLUTION CONTROL AT 1-313-849-2333 AND THE TRENTON FIRE DEPARTMENT.

5. Protect all drains from spilled material (use absorbent or other material as necessary, cover or Plug drain).
 - a. A spill kit is located at: Fuel Island and DPS Garage and consists of absorbent Pads and floor dry.
 - b. The MSDS for all materials are kept: In the DPS Supervisors office and garage.
6. Stop spill from spreading (use absorbent or other diking material such as sand, dirt, etc.a0
7. 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.
8. 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.

9. Dispose of cleaned material/absorbent into secure container for proper disposal.

10. A call to EGLE 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

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

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

Wayne County Public Health Department
Health Administration Building
33030 Van Born
Wayne, MI 48184

SPILL RESPONSE EQUIPMENT

- ✓ **250 LB. FLOOR DRY**
- ✓ **Brooms**
- ✓ **Shovels**
- ✓ **Caution Tape**
- ✓ **Absorbent Pads**
- ✓ **Sand and truck spreader**
- ✓ **Front Loader**
- ✓ **Lined dumpster boxes**
- ✓ **Container for clean-up (30 gallon)**

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:	

Appendix E: Comprehensive Inspection Report

Date:	Facility Name:
Inspector Name:	
Comprehensive Inspection Schedule: Every six months	

The permit requires a schedule for comprehensive site inspection to include but not be limited to, the areas and equipment identified in the preventive maintenance program and good housekeeping procedures, a review of the routine preventive maintenance reports, and any other paperwork associated with the stormwater at the facility. The whole facility should be evaluated during the comprehensive inspection. In contrast to the routine inspections, comprehensive inspections should focus on areas that have a reasonable potential for significant materials to contaminate stormwater runoff.

Check Box	Method	Comment/Action Taken
	Review Routine Inspection and Good Housekeeping Forms	
	Review vehicle and equipment maintenance logs	
	Review spill reports (if applicable)	
	Review Spill Response Procedures and phone numbers for updates	
	Check high risk areas for need of safety posts, barriers, or fences to eliminate accidental spills due to human error. Many of these types of structures may already be required under other regulations.	
	Review facility operations and determine if additional structural controls are needed to prevent releases of materials to the environment.	

The Facility is in compliance.

Printed Name and Title

Signature and Date

SOP: Catch Basin Inspection and Cleaning

Introduction

Catch basins help minimize flooding and protect water quality by removing trash, sediment, decaying debris, and other solids from stormwater runoff. These materials are retained in a sump below the invert of the outlet pipe (older catch basins may not have a sump). Catch basin cleaning reduces foul odors, prevents clogs in the storm drain system, and reduces the loading of trash, suspended solids, nutrients, bacteria, and other pollutants to receiving waters. The goal of this written Standard Operating Procedure (SOP) is to provide guidance to municipal employees on catch basin inspection and cleaning to reduce the discharge of pollutants from the MS4. If services are contracted, this SOP should be provided to the contractor. The contract should specify that the contractor is responsible for compliance with all applicable laws.

This SOP can also be used for inspection of catch basins or manholes for the purpose of conducting catchment investigations as part of the municipality's Illicit Discharge Detection and Elimination program.

Trenton DPW and School Maintenance staff perform routine inspections, cleaning, and maintenance of the approximately 1200 catch basins that are located within the MS4 regulated area. All of the community's catch basins have very little sediment accumulation rates, require little maintenance and are of low priority. Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPW and School Maintenance as needed. At that time, it will be determined if the catch basin will require maintenance on a more frequent interval and warrants a reclassification to a medium priority rating.

The City of Trenton and Schools will implement the following catch basin inspection and cleaning procedures to reduce the discharge of pollutants from the MS4:

Procedures

Inspection and Cleaning Frequency

- The Goal is to inspect 20% of City owned Catch Basins annually.
- Catch basins near construction activities (roadway construction, residential, commercial, or industrial development or redevelopment) or high-use areas should be inspected and cleaned more frequently if inspection finds excessive sediments or debris loadings.
- Catch basins should be cleaned to ensure that they are no more than 50 percent full at any time. A catch basin sump is more than 50 percent full if the contents within the sump exceed one half the distance between the bottom interior of the catch basin to the invert of the deepest outlet of the catch basin. Establish inspection and maintenance frequencies needed to meet this "50 percent" goal. If a catch basin sump is more than 50 percent full during two consecutive inspections, document the findings, investigate the contributing drainage area for sources of excessive sediment loading, and, if possible, address the contributing sources. If no contributing sources are found, increase the inspection and cleaning frequencies of the sump.

Standard Operating Procedures

- Street sweeping performed on an appropriate schedule will reduce the amount of sediment, debris, and organic matter entering the catch basins, which will in turn reduce the frequency with which they need to be cleaned.

Inspection and Cleaning Procedures

Catch basin inspection and cleaning procedures should address both the grate opening and the catch basin structure, including the sump and any inlet and outlet pipes. Document any and all observations about the condition of the catch basin structure and water quality (an inspection form and log of catch basins cleaned or inspected are included in the attachments). Collect data on the condition of the physical basin structure, its frame, and the grate, as well as on the quality of stormwater conveyed by the structure. Observations like those below can indicate sources of pollution within the storm drain system:

- Oil sheen
- Discoloration
- Trash and debris

Both oil and bacteria can create a sheen on the water's surface. The source of a sheen can be differentiating by disturbing it (e.g., with a pole). A sheen caused by oil will remain intact and move in a swirl pattern, while a sheen caused by bacteria will separate and appear "blocky." The bacteria that cause this sheen are naturally occurring iron bacteria – they are not considered a pollutant but should be noted. Other types of bacteria, such as fecal bacteria, are considered pollutants and their discovery should be recorded.

Observations like those below can indicate a potential connection of a sanitary sewer to the storm drain system, which is an illicit discharge:

- Indications of sanitary sewage, including fecal matter or sewage odors
- Foaming, such as from detergent
- Optical enhancers, fluorescent dye added to laundry detergent

In general, adhere to the following procedures when inspecting and cleaning catch basins. Record the findings in the log in the attachments:

1. Implement appropriate traffic safety procedures (e.g., traffic cones) prior to and during the catch basin inspection and cleaning process.
2. Work upstream to downstream in a given drainage network.
3. Clean sediment and trash off of the grate.
4. Visually inspect the outside of the grate.
5. Remove the grate and visually inspect the inside of the catch basin to determine cleaning needs.
6. Inspect the catch basin for structural integrity.
7. Determine the most appropriate equipment and method for cleaning the basin:
 - a. Manually use a shovel to remove accumulated sediments.
 - b. Use a bucket loader to remove accumulated sediments.
 - c. Use a high pressure washer to clean any remaining material out of the catch basin while capturing the slurry with a vacuum.
 - d. If necessary, after the catch basin is cleaned, use the rodder of the vacuum truck to clean the downstream pipe and pull back sediment that might have entered it.

Standard Operating Procedures

8. If contamination is suspected, chemical analysis will be required to determine if the materials comply with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) regulations. The chemical analysis required will depend on suspected contaminants. Note the identification number of the catch basin on the sample label and note sample collection on the Catch Basin Inspection Form.

Handling and Disposal of Catch Basin Cleanings

- Properly dispose of collected sediments and catch basin cleanings (solid material, such as leaves, sand, and twigs removed from stormwater collection systems during cleaning operations).
- Dewatering from stormwater-only drainage system cleaning may be discharged into the Sanitary Sewer System after contacting and receiving permission from the City of Trenton WWTP Superintendent (Julie Willison 734-676-0646).
- Cleanings from stormwater-only drainage systems may be disposed at any landfill that is permitted by to accept solid waste. EGLE does not routinely require stormwater-only catch basin cleanings to be tested before disposal, unless there is evidence that they have been contaminated by a spill or some other means.
- Catch basin cleanings must be handled and disposed in accordance with compliance with the applicable EGLE regulations, policies, and guidance.

Documentation and Reporting

The following information should be documented and included in the municipality's annual report – use the catch basin inspection log provided in the attachments to document the information to include in the report (alternatively, obtain records of volume of debris removed to include in the report):

- Metrics and other information used to reach the determination that the established plan for cleaning and maintenance is optimal for the MS4 (include in the SWMP and first annual report)
- Any action taken in response to excessive sediment or debris loadings
- Total number of catch basins
- Number of catch basins inspected
- Number of catch basins cleaned
- Total volume or mass of material removed from catch basins.

Employee Training

- Employees who perform catch basin cleaning and inspection are trained annually on these procedures and the proper operation of related equipment.
- Employees are also trained on stormwater pollution prevention, illicit discharge detection and elimination (IDEP) procedures, and spill and response procedures, per the SWMP frequency schedule.
- If services are contracted, the contractor should be given a copy of this and any applicable SOPs to ensure compliance with MS4 regulations.

Attachments

1. Catch Basin Inspection Form and Log
2. Catch Basin Inventory

CATCH BASIN INSPECTION FORM

Inspector: _____ Date: _____

Catch Basin I.D.		Final Discharge from Structure? Yes <input type="checkbox"/> No <input type="checkbox"/> If Yes, Discharge to Outfall No: _____		
Catch Basin Label:	Stencil <input type="checkbox"/>	Ground Inset <input type="checkbox"/>	Sign <input type="checkbox"/>	None <input type="checkbox"/> Other _____
Basin Material:	Concrete <input type="checkbox"/> Corrugated metal <input type="checkbox"/> Stone <input type="checkbox"/> Brick <input type="checkbox"/> Other: <input type="checkbox"/>	Catch Basin Condition:		Good <input type="checkbox"/> Poor <input type="checkbox"/> Fair <input type="checkbox"/> Crumbling <input type="checkbox"/>
Pipe Material:	Concrete <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Clay Tile <input type="checkbox"/> Other: _____	Pipe Measurements:		Inlet Dia. (in): d= _____ Outlet Dia. (in): D= _____
Required Maintenance/ Problems (check all that apply):				
<input type="checkbox"/> Tree Work Required <input type="checkbox"/> New Grate is Required <input type="checkbox"/> Pipe is Blocked <input type="checkbox"/> Frame Maintenance is Required <input type="checkbox"/> Remove Accumulated Sediment <input type="checkbox"/> Pipe Maintenance is Required <input type="checkbox"/> Basin Undermined or Bypassed		<input type="checkbox"/> Cannot Remove Cover <input type="checkbox"/> Ditch Work <input type="checkbox"/> Corrosion at Structure <input type="checkbox"/> Erosion Around Structure <input type="checkbox"/> Remove Trash & Debris <input type="checkbox"/> Need Cement Around Grate Other: _____		
Catch Basin Grate Type:	Sediment Buildup Depth:	More than 50% full?	Description of Flow:	Street Name/ Structure Location:
Bar: <input type="checkbox"/> Cascade: <input type="checkbox"/> Other: _____ Properly Aligned: Yes <input type="checkbox"/> No <input type="checkbox"/>	0-6 (in): _____ 6-12(in): _____ 12-18 (in): _____ 18-24 (in): _____ 24 + (in): _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	Heavy <input type="checkbox"/> Moderate <input type="checkbox"/> Slight <input type="checkbox"/> Trickling <input type="checkbox"/>	
*If the outlet is submerged check yes and indicate approximate height of water above the outlet invert. height above invert (in): _____			Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/> Flow	Observations:		Circle those present:	
<input type="checkbox"/> Standing Water (check one or both)	Color: _____		Foam	Oil Sheen
	Odor: _____		Sanitary Waste	Bacterial Sheen
Weather Conditions :	Dry > 24 hours <input type="checkbox"/>	Wet <input type="checkbox"/>	Orange Staining	Floatables
Sample of Screenings Collected for Analysis? Yes <input type="checkbox"/> No <input type="checkbox"/>			Excessive sediment	Pet Waste
Amount of sediment removed:			Other: _____	Optical Enhancers
Comments:				

