

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

version 1.8

(Submission #: 2PH-E18F-ZWA2, version 4)

Details

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

Submission # 2PH-E18F-ZWA2

Submission Reason Renewal

Status Submitted

Form Input

Existing Permit Details

Existing Permit ID (Read Only)
-5816854386928020065

Existing Permit Number (Read Only)
MIG610021

Section 1. Applicant Information

Applicant Information

Prefix

NONE PROVIDED

First Name

NONE PROVIDED

Last Name

NONE PROVIDED

Title

NONE PROVIDED

Organization Name

Charter Township of Van Buren

Phone Type

Business

Number

7346998900

Extension

Email

NONE PROVIDED

Fax

NONE PROVIDED

46425 Tyler Road

Belleville, MI 48111

US

Section 2. MS4 Location Information

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

Van Buren Twp MS4-Wayne

Identify the Primary Municipal Facility or the Mailing Address Location

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

Facility Location

42.2336,-83.4947

Section 3. MS4 Contacts (1 of 1)

CONTACTS

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

Contact

Application Contact

Contact

Prefix

Mr.

First Name

Matthew

Last Name

Best

Title

Deputy Director

Organization Name

Charter Township of Van Buren

Phone Type

Business

Number

7346998913

Extension

Email

mbest@vanburen-mi.org

Fax

NONE PROVIDED

46425 Tyler Road

Belleville, MI 48111

US

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

Regulated Area

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

[Urbanized Area Link](#)

Select an Urbanized Area

Ann Arbor

Outfall and Point of Discharge Information

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

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

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

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

An example table is available at the link below.

[Outfall and Point of Discharge example table link](#)

OUTFALL AND POINT OF DISCHARGE INFORMATION

wrd-stormwater-MS4-App_Table_1_VBT.pdf - 03/28/2017 09:07 AM

Comment

NONE PROVIDED

NOTE (CREATED)

Outfall Info APPROVED

Created on 4/9/2020 2:48 PM by **Erica Stevenson**

Nested Jurisdictions

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

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

Nested Jurisdiction

Prefix

NONE PROVIDED

First Name

NONE PROVIDED

Last Name

NONE PROVIDED

Title

NONE PROVIDED

Organization Name

NONE PROVIDED

Phone Type

NONE PROVIDED

Number

Extension

Email

NONE PROVIDED

Fax

NONE PROVIDED

[NO STREET ADDRESS SPECIFIED]

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

USA

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

STORM WATER MANAGEMENT PROGRAM (SWMP)

This Application requires a description of the Best Management Practices (BMPs) the applicant will implement for each minimum control measure and the applicable water quality requirements during this permit cycle. The applicant shall incorporate the BMPs to develop a SWMP as part of the Application. The SWMP shall be developed, implemented, and enforced to reduce

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

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

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

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

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

[USEPA measurable goals guidance document link](#)

Enforcement Response Procedure (ERP)

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

ERP

[ADW_ERP_VBT_Final.docx - 10/21/2019 08:37 AM](#)

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

ERP is deficient.

Please clarify the timeframe for notifying the responsible party of violations. The recommended timeframe for notifying violators of violations is within 1-2 business days and it is recommended that violations are corrected within 30 days. Provide established timelines to return to compliance.

Created on 10/16/2019 12:47 PM by **Erica Stevenson**

2 COMMENTS

Erica Stevenson (StevensonE@michigan.gov) (12/16/2019 4:44 PM)

The ERP applies to the entire Stormwater Management Program. In this case, I was asking for clarification on the response procedure in the case that any illicit discharges occurred on Township property.

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 8:33 AM)

The ERP refers to Wayne County Part 91 Soil Erosion program that is not under Van Buren Township jurisdiction, I have made the change you requested to the section, but note that the Township does not have the ability to make the County notify violators within 1-2 days.

NOTE (CREATED)

APPROVED

Created on 12/16/2019 4:44 PM by **Erica Stevenson**

Public Participation/Involvement Program (PPP)

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the PPP to

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

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

Yes

PPP Procedures

[ADW Public Participation Program_VBT_030917.docx - 03/20/2017 07:45 AM](#)

Comment

NONE PROVIDED

NOTE (CREATED)

APPROVED

Created on 10/16/2019 12:47 PM by **Erica Stevenson**

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

Page 2, Section III of the ADW Public Participation Program - VBT

3. Provide the reference to the procedure submitted above for inviting public involvement and participation in the implementation and periodic review of the SWMP. (page and paragraph of attachments):

Page 2, Section III of the ADW Public Participation Program - VBT

Section 6. Public Education Program

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

Yes

PEP Procedures

[adw_stormwater_discharge_permit_app_pep_04192019_approved Final.pdf - 10/23/2019 08:35 AM](#)

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

Upload approved ADW PEP and associated table.

The ADW's PEP documents were approved in May 2019. Please upload the final approved documents and remove the old documents. Be sure to update any appropriate references in applicable questions.

Created on 10/16/2019 12:49 PM by **Erica Stevenson**

NOTE (CREATED)

APPROVED

Created on 12/16/2019 4:49 PM by **Erica Stevenson**

4. PEP activities may be prioritized based on the assessment of high priority, community-wide issues and targeted issues to reduce pollutants in storm water runoff. If prioritizing PEP activities, provide the reference to the procedure submitted above with the assessment and list of the priority issues (e.g., Attachment A, Section 1).

NONE PROVIDED

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

For each applicable PEP topic below, identify in the procedure the target audience; key message; delivery mechanism; year

and frequency the BMP will be implemented; and the responsible party. If a PEP topic is determined to be not applicable or a priority issue, provide an explanation.

An example PEP table is available at the link below.

[PEP table example link](#)

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

ADW Collaborative PEP Section IV

CORRECTION REQUEST (APPROVED)

Please provide references for Q. 5.

A-J under Q. 5 must have references to the ADW PEP document that answer the specific question.
Created on 10/16/2019 12:50 PM by **Erica Stevenson**

B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV

C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 9

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

ADW Collaborative PEP Section IV Activity 2

E. Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 2

F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 2

G. Identify and promote the availability, location, and requirement of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 10

H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 2

I. Educate the public on, and promote the benefits of, green infrastructure and low impact development. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 9

J. Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to storm water runoff. Provide the reference to the procedure submitted above or explanation as to why the topic is not applicable.

ADW Collaborative PEP Section IV Activity 9

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

Section VII, Pg 15 Evaluation of Effectiveness

Section 7. Illicit Discharge Elimination Program

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

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

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

Yes

Illicit Discharge Elimination Program Procedures

[adw_collaborative_idep_approved.pdf - 04/13/2020 01:23 PM](#)

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

Upload approved ADW IDEP.

The ADW collaborative IDEP was approved May 2019. Please upload this version of the document. It should include all of the field forms as attachments.

Created on 10/16/2019 12:51 PM by **Erica Stevenson**

Storm Sewer System Map

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

The Developmental Services Office at Van Buren Township Hall.

Illicit Discharge Identification and Investigation

8. The MS4 may be prioritized for detecting non-storm water discharges during the permit cycle. The goal of the prioritization process is to target areas with high illicit discharge potential. If prioritizing, provide the reference to the procedure submitted above with the process for selecting each priority area using the list below. (e.g., Attachment A, page 3, Section b.)

- Areas with older infrastructure
- Industrial, commercial, or mixed use areas
- Areas with a history of past illicit discharges
- Areas with a history of illegal dumping
- Areas with septic systems
- Areas with older sewer lines or with a history of sewer overflows or cross-connections
- Areas with sewer conversions or historic combined sewer systems
- Areas with poor dry-weather water quality
- Areas with water quality impacts, including waterbodies identified in a Total Maximum Daily Load
- Priority areas applicable to the applicant not identified above

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

ADW Collaborative IDEP - Final, Section II

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

ADW Collaborative IDEP - Final, Section II, Figure 1

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

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

The focus of the field observation shall be to observe the following:

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

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

ADW Collaborative IDEP - Final, Section III IDEP #1

11. Provide the reference to the procedure submitted above for performing field screening if flow is observed at an outfall or point of discharge and the source of an illicit discharge is not identified during the field observation. Field screening shall include analyzing the discharge for indicator parameters (e.g., ammonia, fluoride, detergents, and pH). The procedure shall include a schedule for performing field screening.

ADW Collaborative IDEP - Final, Section III, IDEP #3

12. Provide the reference to the procedure submitted above for performing a source investigation if the source of an illicit discharge is not identified by field screening. The procedure shall include a schedule for performing a source investigation.

ADW Collaborative IDEP - Final, Section III, IDEP #3

13. Provide the reference to the procedure submitted above for responding to illegal dumping/spills. The procedure shall include a schedule for responding to complaints, performing field observations, and follow-up field screening and source investigations as appropriate.

ADW Collaborative IDEP - Final, Section III, IDEP #2

14. If prioritizing, provide the reference to the procedure submitted above for responding to illicit discharges upon becoming aware of such a discharge outside of the priority areas. The procedure shall include a schedule for performing field observations, and follow-up field screening and source investigation as appropriate. If not prioritizing, enter Not Applicable .

ADW Collaborative IDEP - Final, Section III, IDEP #2

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

ADW Collaborative IDEP - Final, Section III, IDEP #2 and #8

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

N/A

17. Provide the reference to the procedure submitted above for responding to illicit discharges once the source is identified. The procedure shall include a schedule to eliminate the illicit discharge and pursue enforcement actions. The procedure shall also address illegal spills/dumping.

ADW Collaborative IDEP - Final, Section III, IDEP #2

IDEP Training and Evaluation

18. Provide the reference to the program submitted above to train staff employed by the applicant, who, as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge to the regulated MS4, on the following topics. The program shall include a training schedule for this permit cycle. It is recommended that staff be trained more than once per permit cycle.

- Techniques for identifying an illicit discharge or connection, including field observation, field screening, and source investigation.
- Procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.

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

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

ADW Collaborative IDEP - Final, Section III, IDEP #4

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

ADW Collaborative IDEP - Final, Section III, IDEP #10

Illicit Discharge Ordinance or Other Regulatory Mechanism

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

ADW Collaborative IDEP - Final, Section V and ADW Collaborative IDEP - Final, Attachment H

CORRECTION REQUEST (CORRECTED)

Review the approved ADW IDEP and provide appropriate ordinance/regulatory mechanism.

For discharges to a Twp.'s MS4, the Twp. needs to have something in their individual storm water management program, such as an ordinance or regulatory mechanism. Please provide one of these that prohibits non-storm water discharges into your MS4. The ordinance or regulatory mechanism should also cover the items covered in Q. 21 - 26.

Created on 10/16/2019 4:45 PM by **Erica Stevenson**

5 COMMENTS

Best Matthew (mbest@vanburen-mi.org) (4/13/2020 1:21 PM)

Done.

Erica Stevenson (StevensonE@michigan.gov) (4/9/2020 4:57 PM)

Please call to discuss.

Best Matthew (mbest@vanburen-mi.org) (2/19/2020 6:03 PM)

The legal authority that allows permittees to prohibit, investigate and/or enforce the correction of illicit discharges is established on an individual permittee basis. For most communities, legal authority is granted via the Plumbing Code, Sewer Use Ordinance, Nuisances Ordinance, and Municipal Civil Infraction Ordinance. Van Buren Township does not have an individual stormwater management plan. As a Township, we collectively participate with the ADW and Wayne County for illicit discharge detection and elimination. Wayne County has a IDEP Program that we participate in. I do not understand what exactly you are looking for. It sounds like you are looking for the Township to have their own IDEP Ordinance, but the Township does not, and we were not aware we needed one. Please provide more clear direction of what you require here. I may just be not understanding what you are looking for.

Erica Stevenson (StevensonE@michigan.gov) (12/16/2019 5:01 PM)

Unfortunately, the Michigan Plumbing Code does not satisfy the requirements of this permit. The Twp. needs to provide an ordinance or multiple ordinances to meet permit requirements. EGLE is not requiring the Twp. to enforce stormwater standards on any other jurisdictions, just the Twp.'s own MS4.

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 9:01 AM)

Van Buren is Township. We do not own or maintain any storm water systems that non-Township properties discharge into. We do not own roads, stormwater collection systems nor enforce stormwater standards upon other jurisdictions like Wayne County, who owns and maintains the regional storm water system. The Township relies on the 2012 Michigan Plumbing Code to ensure that only stormwater discharges into the storm systems on township property.

21. Provide the reference to the ordinance or other regulatory mechanism submitted above that excludes prohibiting the discharges or flows from firefighting activities to the applicant's MS4 and requires that these discharges or flows only be addressed if they are identified as significant sources of pollutants to waters of the State. The ordinance shall not authorize illicit discharges; however, the applicant may choose to exclude prohibiting the discharges and flows from firefighting activities if they are identified as not being significant sources of pollutants to waters of the state.

2012 Michigan Plumbing Code

22. Provide the reference to the ordinance or other regulatory mechanism submitted above that excludes prohibiting the following categories of non-storm water discharges or flows if identified as significant contributors to violations of Water Quality Standards. The ordinance shall not authorize illicit discharges; however, the applicant may choose to exclude prohibiting the following discharges or flows if they are identified as not being a significant contributor to violations of Water Quality Standards.

- a. Water line flushing and discharges from potable water sources
- b. Landscape irrigation runoff, lawn watering runoff, and irrigation waters
- c. Diverted stream flows and flows from riparian habitats and wetlands
- d. Rising groundwaters and springs
- e. Uncontaminated groundwater infiltration and seepage
- f. Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits
- g. Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
- h. Air conditioning condensation
- i. Waters from noncommercial car washing
- j. Street wash water
- k. Dechlorinated swimming pool water from single, two, or three family residences. (A swimming pool operated by the permittee shall not be discharged to a separate storm sewer or to surface waters of the state without NPDES permit authorization from the MDEQ.)

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

2012 Michigan Plumbing Code

23. Provide the reference to the ordinance or regulatory mechanism submitted above that regulates the contribution of pollutants to the applicant's MS4 in the attachment above.

ADW Collaborative IDEP - Final, Section IV, 2012 Michigan Plumbing Code

24. Provide the reference to the ordinance or regulatory mechanism submitted above that prohibits illicit discharges, including illicit connections and the direct dumping or disposal of materials into the applicant's MS4 in the attachment above.

ADW Collaborative IDEP - Final, Section IV, 2012 Michigan Plumbing Code

25. Provide the reference to the ordinance or regulatory mechanism submitted above with the authority established to inspect, investigate, and monitor suspected illicit discharges into the applicant's MS4 in the attachment above.

ADW Collaborative IDEP - Final, Section IV, 2012 Michigan Plumbing Code

26. Provide the reference to the ordinance or regulatory mechanism submitted above that requires and enforces elimination of illicit discharges into the applicant's MS4, including providing the applicant the authority to eliminate the illicit discharge in the attachment above.

ADW Collaborative IDEP - Final, Section IV, 2012 Michigan Plumbing Code

Section 8. Construction Storm Water Runoff Control Program

Proposing to work collaboratively on any or all requirements of the Construction Storm Water Runoff Control Program during the permit cycle?

Yes

Qualifying Local Soil Erosion and Sedimentation Control Programs

[Click here to access the list of approved Part 91 Agencies](#)

27. Is the applicant a Part 91 Agency?

No

If yes, choose type

NONE PROVIDED

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

Wayne County SESC PProgram

Construction Storm Water Runoff Control

Construction Storm Water Runoff Control Program Procedure Attachment

ADW_CSWRCP_VBT-County-Part91.docx - 03/13/2017 08:18 AM

Comment

NONE PROVIDED

NOTE (CREATED)

APPROVED

Created on 4/9/2020 4:34 PM by Erica Stevenson

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

Section B - Pg 2 of ADW_CSWRCP_VBT-County-Part91

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

Section D - Pg 3 of ADW_CSWRCP_VBT-County-Part91 As a community that relies on Wayne County to administer Part 91, the Township shall report discharges immediately to Wayne County. Wayne County, who the Township has no jurisdiction over, should report the discharge to EGLE immediately.

CORRECTION REQUEST (APPROVED)

Include timeframe for contacting EGLE (MDEQ).

Please indicate how soon after the discovery of a reportable discharge will the Twp. contact EGLE. EGLE recommends that this timeframe to be immediately.

Created on 10/16/2019 4:28 PM by Erica Stevenson

1 COMMENT

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 9:13 AM)

The Township defers to Wayne County to administer Part 91. They are responsible for reporting to the State. The Township immediately reports Part 91 issues to Wayne County, who in turn, should report to the State

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

Section B - Pg 2 of ADW_CSWRCP_VBT-County-Part91 Any construction activity one acre or greater or located within 500 feet of the water's edge of a lake or stream must obtain a Part 91 permit from Wayne County.

CORRECTION REQUEST (APPROVED)

Include construction activity within 500 feet of a waterbody.

Please include in this paragraph that any construction activity one acre or greater or located within 500 feet of the water's edge of a lake or stream must obtain a Part 91 permit. See R 323.1704 (attached) rule requiring this.
Created on 10/16/2019 4:24 PM by **Erica Stevenson**

1 COMMENT

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 9:15 AM)

Once again, Wayne County enforces Part 91. The Township defers to them in Part 91 related issues.

31. Provide the reference to the procedure submitted above to advise the landowner or recorded easement holder of the property where the construction activity will occur of the State of Michigan Permit by Rule (Rule 323.2190).

Section E - Pg 3 of ADW_CS WRCP_VBT-County-Part91

Section 9. Post-Construction Storm Water Runoff Program

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

The MDEQ has the following resources available to assist with development of a Post-Construction Storm Water Runoff Program.

[>>Click here to access the Post-Construction Storm Water Runoff Program Compliance Assistance Document](#)

Post-Construction Storm Water Runoff Program Procedures, Ordinances, and Regulatory Mechanisms

ADW_POSTCONSTRUCTION_VBT.DOCX - 10/21/2019 09:23 AM

Comment

PLEASE NOTE THAT VAN BUREN TOWNSHIP'S MS4 IS LIMITED TO TOWNSHIP PROPERTY AND THE TOWNSHIP HAS NO PLANS TO DEVELOP OR REDEVELOP THIS PROPERTY WITHIN THE PERMIT CYCLE.

CORRECTION REQUEST (APPROVED)

Please indicate whether the Twp. would adopt Wayne County's standards or develop their own.

I understand that the Twp. does not plan to develop but if that changes, it needs to be clear which course of action the Twp. will take: adopt Wayne County standards or develop their own. Please delete one of the Section B portions of the document.

Created on 10/16/2019 4:50 PM by **Erica Stevenson**

3 COMMENTS

Best Matthew (mbest@vanburen-mi.org) (2/10/2020 2:22 PM)

Thank you

Erica Stevenson (StevensonE@michigan.gov) (12/18/2019 4:04 PM)

I am sorry for the confusing comment before. If the Twp. does not plan to develop or redevelop any of its properties during the next permit cycle (5 years) then the Twp. does NOT need to adopt or develop post-construction standards. Please remove language from the attached document stating that the Twp. will be adopting Wayne County standards.

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 9:28 AM)

How can the Township state a clear course of action here when Wayne County has kept it communities in the dark on their proposed post construction standards. The Township does not want to be forced to make a decision here without knowing what the standards are going to be. This is not a fair request of the Township at all. The Twp. has selected a section B because EGLE is forcing the Township to, not because the Township is making an informed decision.

Ordinance or Other Regulatory Mechanism

32. Provide the reference to the in-effect ordinance or regulatory mechanism submitted above to address post-construction storm water runoff from new development and redevelopment projects, including preventing or minimizing water quality impacts. The ordinance or other regulatory mechanism shall apply to private, commercial, and public projects, including projects where the applicant is the developer. This requirement may be met using a single ordinance or regulatory mechanism or a combination of ordinances and regulatory mechanisms. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

Section B - Pg 2 of ADW_PostConstruction_VBT

CORRECTION REQUEST (APPROVED)

Incorrect references.

Please reference the whole document. For questions 33 - 59, please put "Not Applicable".

Created on 10/18/2019 2:48 PM by **Erica Stevenson**

33. Provide the reference to the ordinance or other regulatory mechanism submitted above that applies to projects that disturb at least one or more acres, including projects less than an acre that are part of a larger common plan of development or sale and discharge into the applicant's MS4. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

Not Applicable

Federal Facilities

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

34. Is the applicant the owner or operator of a federal facility with a storm water discharge

No, skip to Question 36

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

The United States Environmental Protection Agency (USEPA) has a technical guidance available at the following link.

[USEPA Technical Guidance on Implementing the Stormwater Runoff Requirements](#)

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

Not Applicable

Water Quality Treatment Performance Standard

36. Does the ordinance or other regulatory mechanism include one or more of the following water quality treatment standards?

Treat the first one inch of runoff from the entire project site. Provide the ordinance or regulatory mechanism reference in the attachment above (page and paragraph of attachments): e.g., Attachment A, Pages 1-15

Section B and C - Pg 2 of ADW_PostConstruction_VBT

Treat the runoff generated from 90 percent of all runoff-producing storms for the project site. Provide the ordinance or regulatory mechanism reference in the attachment above (page and paragraph of attachments): e.g., Attachment A, Pages 1-15

Section B and C - Pg 2 of ADW_PostConstruction_VBT

If no, provide the date the ordinance or regulatory mechanism will be submitted.

If needed, by October 1, 2017.

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

The MDEQ memo included in the sources below is available at the following link.

[March 24, 2006 MDEQ memo providing the 90 percent annual non-exceedance storm statistics](#)

Sources

NONE PROVIDED

Other rainfall data source (page and paragraph of attachments)

NONE PROVIDED

38. Provide the reference to the ordinance or regulatory mechanism submitted above with the requirement that BMPs be designed on a site-specific basis to reduce post-development total suspended solids loadings by 80 percent or achieve a discharge concentration of total suspended solids not to exceed 80 milligrams per liter. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

Channel Protection Performance Standard

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

A MDEQ spreadsheet is available to assist with these calculations at the following link.

[Calculations for Storm Water Runoff Volume Control Spreadsheet](#)

Provide the reference to the ordinance or regulatory mechanism submitted above.

If needed, by October 1, 2017.

If pursuing an alternative approach, provide the reference to the ordinance or other regulatory mechanism submitted above describing the alternative to meet the minimum requirements, including an explanation as to how the channel protection standard will prevent or minimize water quality impacts.

NONE PROVIDED

40. The channel protection performance standard is not required for the following waterbodies: the Great Lakes or connecting channels of the Great Lakes; Rouge River downstream of the Turning Basin; Saginaw River; Mona Lake and Muskegon Lake (Muskegon County); and Lake Macatawa and Spring Lake (Ottawa County). If applicable, provide the reference to the ordinance or regulatory mechanism submitted above that excludes any waterbodies from the channel protection performance standard. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

Site-Specific Requirements

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

Section B and C - Pg 2 of ADW_PostConstruction_VBT

42. Provide the reference to the ordinance or regulatory mechanism submitted above that requires BMPs to address the associated pollutants in potential hot spots as part of meeting the water quality treatment and channel protection standards for new development or redevelopment projects. Hot spots include areas with the potential for significant pollutant loading such as gas stations, commercial vehicle maintenance and repair, auto recyclers, recycling centers, and scrap yards. Hot spots also include areas with the potential for contaminating public water supply intakes. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

Off-Site Mitigation and Payment in Lieu Programs

43. An applicant may choose to allow for the approval of off-site mitigation for redevelopment projects that cannot meet 100 percent of the performance standards on-site after maximizing storm water retention. Off-site mitigation refers to BMPs implemented at another location within the same jurisdiction and watershed/sewershed as the original project. A watershed is the geographic area included in a 10-digit Hydrologic Unit Code and a sewershed is the area where storm water is conveyed by the applicant's MS4 to a common outfall or point of discharge. If proposing to allow for off-site mitigation, provide the reference to the ordinance or regulatory mechanism submitted above with the off-site mitigation requirements. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

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

If needed, by October 1, 2017.

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

If needed, by October 1, 2017.

46. Provide the reference to the ordinance or regulatory mechanism submitted above that establishes a minimum amount of storm water to be managed on-site as a first tier for off-site mitigation or payment in lieu. A higher offset ratio is required if off-site mitigation or payment in lieu is requested for the amount of storm water identified as the first tier. For example, a minimum of 0.4 inches of storm water runoff shall be managed on-site as a first tier. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

47. Provide the reference to the ordinance or regulatory mechanism submitted above that requires an offset ratio of 1:1.5 for the amount of storm water above the first tier (identified in Question 46) not managed on-site to the amount of storm water required to be mitigated at another site or for which in-lieu payments shall be made. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

48. Provide the reference to the ordinance or regulatory mechanism submitted above requiring that if demonstrated by the developer to the applicant that it is completely infeasible to manage the first tier of storm water identified in Question 47 on-site, the offset ratio for the unmanaged portion is 1:2. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

49. Provide the reference to the ordinance or regulatory mechanism submitted above that requires a schedule for completing off-site mitigation and in-lieu projects. Off-site mitigation and in-lieu projects should be completed within 24 months after the start of the original project site construction. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

50. Provide the reference to the ordinance or regulatory mechanism submitted above that requires that offsets and in-lieu projects be preserved and maintained in perpetuity, such as deed restrictions and long-term operation and maintenance. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

If needed, by October 1, 2017.

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

No off-site or in-lieu projects to track. No plan to have those type of projects in the future.

52. If there are any other exceptions to the performance standards (other than off-site mitigation and payment in lieu) being implemented or to be implemented during the permit cycle, provide the reference to the document submitted above describing the exception(s). The applicant shall demonstrate how the exception provides an equivalent or greater level of protection as the performance standards.

NONE PROVIDED

Site Plan Review

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

If needed, by October 1, 2017.

54. Provide the reference to the procedure submitted above for site plan review and approval. If not available at this time, provide the date the procedure will be available.

If needed, by October 1, 2017.

55. Provide the reference to the site plan review and approval procedure submitted above describing the process for determining how the developer meets the performance standards and ensures long-term operation and maintenance of BMPs in the attachment above. If not available at this time, provide the date the procedure will be available.

If needed, by October 1, 2017.

Long-Term Operation and Maintenance of BMPs

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

If needed, by October 1, 2017.

57. Provide the reference to the ordinance or regulatory mechanism submitted above that requires a maintenance agreement between the applicant and owners or operators responsible for the long-term operation and maintenance of structural and vegetative BMPs installed and implemented to meet the performance standards. If not available at this time, provide the date the procedure will be available.

If needed, by October 1, 2017.

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

Inspect the structural or vegetative BMP

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

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

NONE PROVIDED

59. Provide the reference to the procedure submitted above for tracking compliance with a maintenance agreement or other legal mechanism to ensure the performance standards are met in perpetuity in the attachment above.

Section B and C - Pg 2 of ADW_PostConstruction_VBT

Section 10. Pollution Prevention and Good Housekeeping Program

Pollution Prevention and Good Housekeeping Program Procedures

ADW_PPGH_GENERAL_PROC_VBT FINAL.pdf - 04/13/2020 01:14 PM

Comment

NONE PROVIDED

Municipal Facility and Structural Storm Water Control Inventory

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

AWD PPGH General Procedures VBT Final, Section D, Table 1 1 Detention Basin 1 Underground Detention System 1 Underground Storage Tank 9 Catch Basins 1 Vegetation Swale 1 oil/water separator

CORRECTION REQUEST (APPROVED)

Table 1 is missing addresses.

The location of each facility that has a discharge of storm water needs to be included. Please edit Table 1 in the General SOP to include the address of each facility listed.

Created on 10/18/2019 11:31 AM by **Erica Stevenson**

Facilities that may have the high potential to discharge pollutants:

NONE PROVIDED

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

Administration buildings and libraries

Cemeteries

Fire Stations

Parks

Vacant land and open space

Other: Water Tower

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

Catch basins

Detention basins

Oil/water separators

Underground storage vaults or tanks

Vegetated swales

61. Provide the location where an up-to-date map (or maps) is available with the location of the facilities and structural storm water controls identified in Question 60. The location of the facilities and structural storm water controls may be included on the storm sewer system map maintained for the IDEP. The map (or maps) is available at the following location: (e.g., The Department of Public Works office)

Developmental Services Office at Van Buren Township Hall

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

AWD PPGH General Procedures VBT Final, Section C

Facility-Specific Storm Water Management

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

The applicant should consider the following factors when assessing each facility:

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

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

Question 71.

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

AWD PPGH General Procedures VBT Final, Section C,D

If not applicable

NONE PROVIDED

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

AWD PPGH General Procedures VBT Final, Section D, Table 1

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

Not Applicable The applicant does not own or operate any facilities with the high potential for pollutant runoff. Skip to Question 70.

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

NONE PROVIDED

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

NONE PROVIDED

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

NONE PROVIDED

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

NONE PROVIDED

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

NONE PROVIDED

Structural Storm Water Control Operation and Maintenance Activities

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

AWD PPGH General Procedures VBT Final, Section C

CORRECTION REQUEST (APPROVED)

Incorrect reference.

Please change the reference to state Section F.

Created on 10/17/2019 4:00 PM by **Erica Stevenson**

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

Medium - 3 Catch Basins @ Fire Station #1; 6 Catch Basins @ Fire Station #2

CORRECTION REQUEST (APPROVED)

Incorrect reference.

Please refer to a document that has this information. Table 1 in the General SOP would work.

Created on 10/17/2019 4:15 PM by **Erica Stevenson**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

AWD PPGH General Procedures VBT Final, Section G Note that when is it determined that the catch basins need to be cleaned, EGLE recommends that a cleaning criteria of the sump being 50% full.

CORRECTION REQUEST (APPROVED)

What is the cleaning criteria for catch basins?

When is it determined that the catch basins need to be cleaned? EGLE recommends that a cleaning criteria of the sump being 50% full.

Created on 10/17/2019 4:28 PM by **Erica Stevenson**

2 COMMENTS

Best Matthew (mbest@vanburen-mi.org) (2/10/2020 2:39 PM)

I have added "EGLE recommends that a cleaning criteria of the sump being 50% full." to section G

Erica Stevenson (StevensonE@michigan.gov) (12/16/2019 3:44 PM)

This needs to be stated within a document of the Stormwater Management Plan. I would suggest that it is included under Section G of the General Procedures SOP document.

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

AWD PPGH General Procedures VBT Final, Section H If the Township does not contract out cleaning activities, then the collected material from catch basin maintenance and street sweeping activities is transported to, dewatered and disposed of at the South Huron Valley Treatment Facility.

CORRECTION REQUEST (APPROVED)

Does the Twp dewater catch basin waste?

If so, please describe how the waste is dewatered.

Created on 10/18/2019 10:13 AM by **Erica Stevenson**

3 COMMENTS

Best Matthew (mbest@vanburen-mi.org) (2/10/2020 2:54 PM)

If the Township does not contract out cleaning activities, then the collected material from catch basin maintenance and street sweeping activities is transported to, dewatered and disposed of at the South Huron Valley Treatment Facility. I have adjusted Section G

Erica Stevenson (StevensonE@michigan.gov) (12/18/2019 4:08 PM)

If the Twp. contracts out catch basin cleaning then please state that in the SOP. Under Section G it states that Twp. staff utilize a vactor truck to remove solids and liquids. Therefore I assumed that the Twp. did its own cleaning. Remove the language stating that the Twp. does its own cleaning and replace it with some language indicating that the Twp. contracts that work out.

Best Matthew (mbest@vanburen-mi.org) (10/21/2019 9:45 AM)

The Township does not maintain storm water systems nor clean catch basins that would require de watering of catch basin waste. If maintaining a catch basin on Township property becomes necessary, the Township hires a contractor.

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

AWD PPGH General Procedures VBT Final, Section J

CORRECTION REQUEST (APPROVED)

Missing procedure for vegetated swales.

Vegetated swales are listed as a applicant-owned structural control. How does the Twp. inspect and maintain their vegetated swales? Please provide.

Created on 10/18/2019 10:18 AM by **Erica Stevenson**

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

AWD PPGH General Procedures VBT Final, Section K

Municipal Operations and Maintenance Activities

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

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

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

CORRECTION REQUEST (APPROVED)

Select parking lot/street maintenance.

Please review this list of municipal operations and check the ones that the Twp. provides. At a minimum, parking lot maintenance should be selected. Cold weather operations will need to be indicated as well if the Twp. applies salt/brine to any of their parking lots.

Created on 10/18/2019 11:11 AM by **Erica Stevenson**

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

AWD PPGH General Procedures VBT Final, Section I

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

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

This needs to be stated in the General Procedures SOP.

Writing a response in the reference portion of the application does not mean it is included in the Twp. SWMP. Please state this information under Section I of the General SOP.

Created on 10/18/2019 11:28 AM by **Erica Stevenson**

79. Provide the reference to the narrative description or map submitted above with the geographic location of the streets, parking lots, and other impervious surfaces in each priority level.

A map is available for review at the Developmental Services Office at Van Buren Township Hall

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

AWD PPGH General Procedures VBT Final, Section I

CORRECTION REQUEST (CORRECTED)

Please state that the Twp. contracts out street sweeping.

Please edit Section I of the P2/GH document to state, "Township owned parking lots will be evaluated yearly and swept as needed. The Township contracts out the work." or something along those lines.

Created on 4/9/2020 4:41 PM by **Erica Stevenson**

1 COMMENT

Best Matthew (mbest@vanburen-mi.org) (4/13/2020 1:13 PM)

Done.

CORRECTION REQUEST (APPROVED)

This needs to be stated in the General Procedures SOP.

Writing a response in the reference portion of the application does not mean it is included in the Twp. SWMP. Please state this information under Section I of the General SOP.

Created on 10/18/2019 11:38 AM by **Erica Stevenson**

2 COMMENTS

Best Matthew (mbest@vanburen-mi.org) (2/10/2020 3:03 PM)

Township contracts out parking lot cleaning activities, as needed.

Erica Stevenson (StevensonE@michigan.gov) (12/18/2019 4:09 PM)

The Twp. does maintain the parking lots at their own facility. Please indicate if the Twp. has their own sweeper machine, if they sweep by hand, if they contract out, or other procedures that the Twp. has for cleaning their facilities.

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

AWD PPGH General Procedures VBT Final, Section G

Managing Vegetated Properties

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

[Commercial Pesticide Application Certification Categories](#)

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

Section L of the General Procedures SOP.

CORRECTION REQUEST (APPROVED)

Incorrect reference.

Please refer to Section L of the General Procedures SOP.

Created on 10/18/2019 11:48 AM by **Erica Stevenson**

Contractor Requirements and Oversight

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

AWD PPGH General Procedures VBT Final, Section N

Employee Training

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

AWD PPGH General Procedures VBT Final, Section M

Section 11. Total Maximum Daily Load Implementation Plan

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

Total Maximum Daily Load Implementation Plan

[adw_tmdl_plan_2019_final.pdf - 10/23/2019 09:01 AM](#)

[ADW-TMDL-MS4-Plan-Priority-Action-Table.xlsx - 02/10/2020 03:05 PM](#)

Comment

NONE PROVIDED

CORRECTION REQUEST (APPROVED)

TMDL Priority Action Table is in draft form.

It looks like it is still in draft form because there are highlighted portions for the Twp. to add information. Please update the attached TMDL Priority Action Plan with Van Buren's specific information.

Created on 12/16/2019 4:04 PM by **Erica Stevenson**

1 COMMENT

Best Matthew (mbest@vanburen-mi.org) (2/10/2020 3:05 PM)

Thank you for catching that. It has been corrected

CORRECTION REQUEST (APPROVED)

Please upload approved ADW TMDL.

The ADW TMDL plan was revised and re-approved in August 2019. Please upload this plan. Review the MS4 task list for accuracy with the new plan.

Created on 10/18/2019 12:31 PM by **Erica Stevenson**

NOTE (CREATED)

APPROVED

Created on 4/9/2020 4:44 PM by **Erica Stevenson**

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

Yes

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

TMDL Implementation Plan for the ADW Section 1.

CORRECTION REQUEST (APPROVED)

Missing reference.

Please refer to the TMDL Implementation Plan for the ADW Section 1.

Created on 10/18/2019 12:37 PM by **Erica Stevenson**

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

TMDL Implementation Plan for the ADW Section II.

CORRECTION REQUEST (APPROVED)

Missing reference.

Please refer to the TMDL Implementation Plan for the ADW Section II.
Created on 10/18/2019 12:51 PM by **Erica Stevenson**

87. Provide the reference to the TMDL BMP Priority List submitted above with prioritized BMPs currently being implemented or to be implemented during the permit cycle to make progress toward achieving the pollutant load reduction requirement in each TMDL identified in Question 85. Each BMP shall include a reference to the targeted TMDL pollutant.

TMDL Implementation Plan Priority Action Table.

CORRECTION REQUEST (APPROVED)

Missing reference.

Please refer to the TMDL Implementation Plan Priority Action Table.
Created on 10/18/2019 12:58 PM by **Erica Stevenson**

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

TMDL Implementation Plan for the ADW Section III.

CORRECTION REQUEST (APPROVED)

Missing reference.

Please refer to the TMDL Implementation Plan for the ADW Section III.
Created on 10/18/2019 1:09 PM by **Erica Stevenson**

Section 12. Phase I only Industrial Facility Inspection Program

Industrial Facility Inspection Program Procedures

NONE PROVIDED

Comment

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

NONE PROVIDED

91. Provide the reference to the procedure submitted above for prioritizing the industrial facilities identified in Question No. 90

for inspection. Each industrial facility shall be evaluated and prioritized based on having a high, medium or low potential to discharge pollutants to the applicant's MS4. The procedure shall include a process for updating and revising the prioritization, including modifying the priority level based on contribution of significant pollutant loading to the MS4, inspection findings, and the potential to discharge pollutants.

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

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

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

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

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

NONE PROVIDED

Section 13. Certify and Submit

Comments (As needed)

NONE PROVIDED

Additional Documents (As needed)

NONE PROVIDED

Comment

NONE PROVIDED

Status History

	User	Processing Status
4/13/2020 1:12:04 PM	Best Matthew	Draft
4/13/2020 1:27:52 PM	Best Matthew	Submitted

Audit

Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Stevenson	10/16/2019 12:47 PM
Submission Unlocked	Submission Unlocked	Erica Stevenson	10/18/2019 2:55 PM

Revisions

Revision	Revision Date	Revision By
Revision 1	4/5/2017 12:54 PM	Best Matthew
Revision 2	10/21/2019 8:27 AM	Best Matthew
Revision 3	2/10/2020 10:51 AM	Best Matthew
Revision 4	4/13/2020 1:12 PM	Best Matthew

Submission Agreements

Rule 323.2114(1-4), promulgated under the NREPA, requires that this Application be signed by either a principal executive officer or ranking elected official (e.g., mayor, village president, city or village manager, or clerk). Note: If the signatory is not a principal executive officer or ranking elected official, but is authorized to sign the Application, please provide documentation of the authorization.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for having knowledge of violations."

I understand that my signature constitutes a legal agreement to comply with the requirements of the NPDES Permit. I certify under penalty of law that I possess full authority on behalf of the legal owner/permittee to sign and submit this Application. I certify to the best of my knowledge that it is true, accurate and meets the minimum permit requirements for a SWMP to the MEP.

<input checked="" type="checkbox"/>	I am the owner of the account used to perform the electronic submission and signature.
<input checked="" type="checkbox"/>	I have the authority to submit the data on behalf of the facility I am representing.
<input checked="" type="checkbox"/>	I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
<input checked="" type="checkbox"/>	I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

Public Participation Program for the Alliance of Downriver Watersheds MS4s



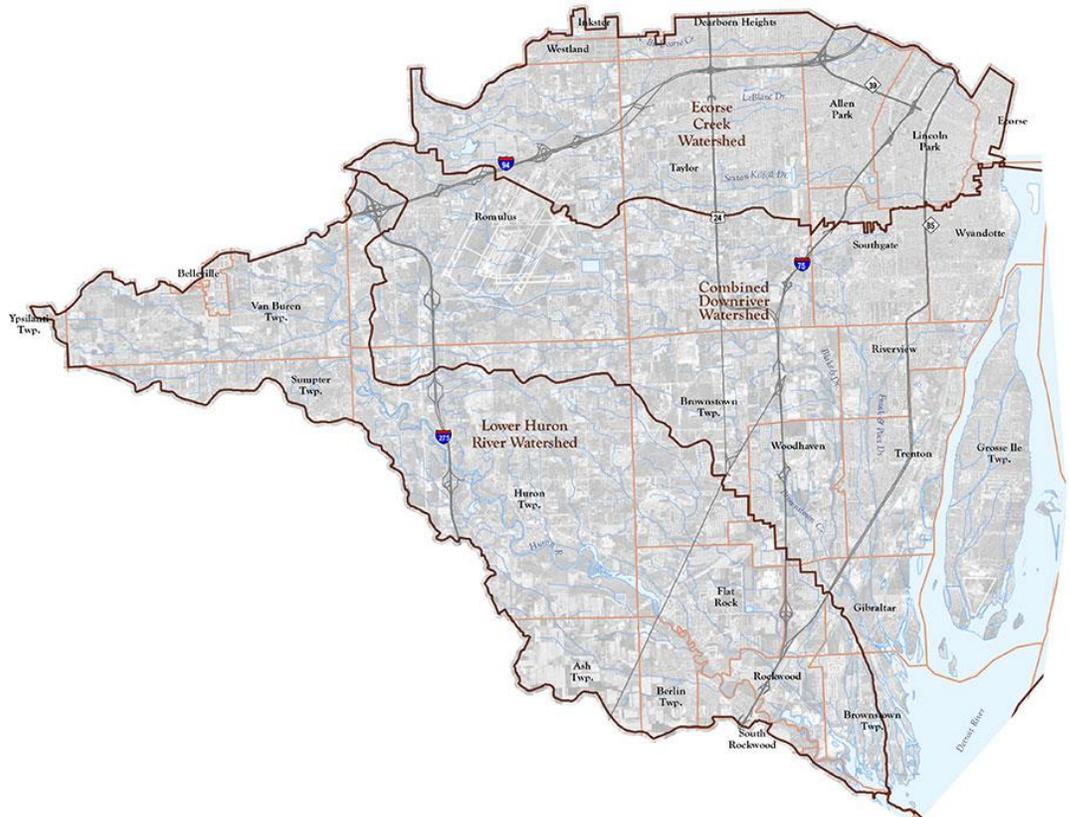
The Public Participation/Involvement Program (PPP) is required by the State of Michigan National Pollutant Discharge Elimination System (NPDES) Permit Application for Discharge of Stormwater to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4).

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

I. GENERAL INFORMATION

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

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



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

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

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

II. COMMUNICATION DURING THE SWMP DEVELOPMENT PROCESS

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

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

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

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

BMP 1.1. Public Notice

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

public contact lists. Individual MS4s will post links to the SWMPs (housed on the ADW website) on their individual MS4 websites. Additionally, other means of communication will be used for announcing progress on SWMP elements and soliciting input. These may include publication in local news media outlets, announcements to local boards, associations, other interested groups, at public meetings or major public events, articles in local newsletters, or posts on web sites and social networking sites. Each MS4 will follow any public notice requirements specific to their local jurisdiction. The same public notice procedure will be used following any major SWMP revision.

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

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

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

BMP 1.2 Public Access to SWMPs

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

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

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

Responsible Parties: The ADW and individual MS4s.

BMP 1.3 SWMP Implementation

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

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

Evaluation: Document MS4 representative and citizen participation in meetings.

Responsible Parties: MS4 representatives, ADW.

BMP 1.4 SWMP Review

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

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

Evaluation: Comments from the general public.

Responsible Parties: ADW and MS4s.

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN



For the Alliance of Downriver Watersheds MS4s

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

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

Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township

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

May 31, 2019
VBT Update April 13, 2020

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ATTACHMENTS

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

I. INTRODUCTION

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

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

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

II. PRIORITY AREAS

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

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

The criteria used to identify them as a priority included:

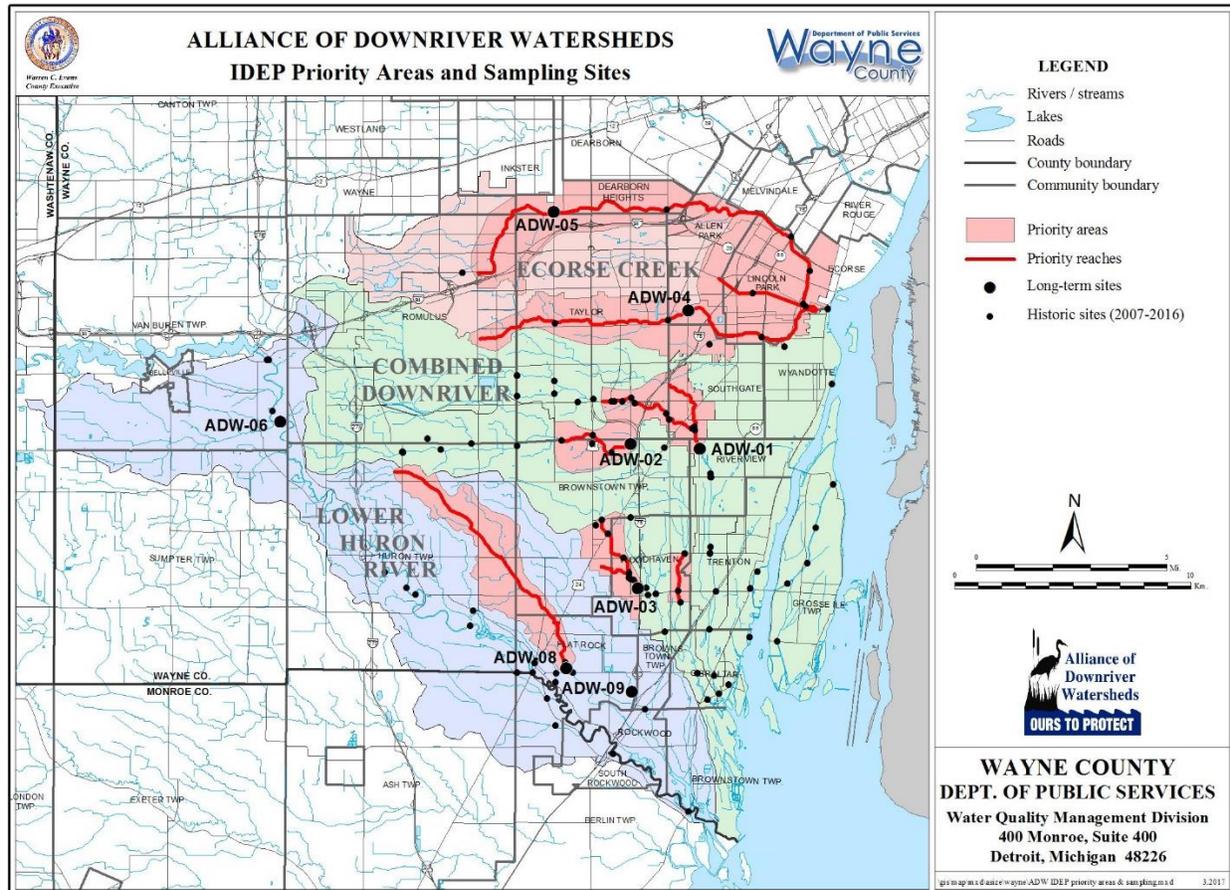
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling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

Priority IDEP Work Areas

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

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

Figure 1: IDEP Priority Work Areas and Monitoring Sites



Routine IDEP Areas

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

III. COLLABORATIVE IDEP ACTIVITIES

IDEP# 1: IDEP Investigative & Progress Evaluation Monitoring

Funding: ADW

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

Schedule: Annually, April – September

ADW Member Responsibilities:

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

Measure of Assessment:

- Number/portion of sites sampled

BMP Goal:

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

IDEP #2: Environmental Hotline and Coordinated Complaint Response

Funding: Wayne County, ADW Members

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

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

Schedule: Continuous

ADW Member Responsibilities:

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

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

Measures of Assessment:

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

BMP Goal:

- 100% of complaints addressed and plan for resolution identified

IDEP #3: Priority Area IDEP Advanced Investigations

Funding: ADW

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

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

ADW Member Responsibilities:

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

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

Measures of Assessment:

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

BMP Goals:

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

IDEP #4: Staff Training

Funding: ADW

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

Investigator Level

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

Alert Observer Level

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

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

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

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

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

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

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of staff trained

BMP Goals:

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

IDEP #5: Inspection of ADW Member Owned Facilities

Funding: ADW

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

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

ADW Member Responsibilities:

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

Measures of Assessment:

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

BMP Goals:

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

IDEP #6: Visual Inspection during Routine Field Operations

Funding: ADW, Wayne County, and Communities

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

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

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

Funding: Communities and nested school districts

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

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

ADW Member Responsibilities:

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

Measures of Assessment:

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

BMP Goals:

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

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

Funding: ADW with Wayne County providing GIS data management

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

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

ADW Member Responsibilities:

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

Measures of assessment:

- Portion of watershed area with known outfalls mapped in GIS

BMP Goal:

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

IDEP #9: Volunteer Training

Funding: ADW via Public Education and Progress Evaluation budgets

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

Schedule: Annually as volunteer monitoring training occurs.

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of volunteers trained

BMP Goal:

- Training held annually during each year of the permit cycle

IDEP #10: Method to Evaluate IDEP Effectiveness

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

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

Schedule: Continuous with summary report submitted biennially.

ADW Member Responsibilities:

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

IV. CORRECTIVE ACTION NOTIFICATION

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

Discharges from Private Sources to MS4s

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

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

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

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

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

Corrections/Repairs:

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

Discharges from Public Properties to MS4s

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

Discharges from Permittee's Properties

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

Discharges from Septic Systems

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

V. LEGAL AUTHORITY

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

Table 1. IDEP Regulatory Mechanisms Available to Permittees

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

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

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

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

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

Source: Oakland County Water Resources Commissioner’s Office

**STORMWATER DISCHARGE
PERMIT APPLICATION**



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

For the Alliance of Downriver Watersheds MS4s

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Community Name: _____

Complaint made by: _____ Phone #: _____

Date: _____ Time: _____

Location of Problem: _____

Offending Party (if known) _____

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

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

Nature of Emergency: _____

Initial contact made to: 911 City Dept _____

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

Other _____

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Investigation Summary Initial Investigation Follow-up Investigation

Date of Investigation: _____ Investigating Agency: _____

Crew Members _____

Location of Discharge: _____

Investigation Location: _____

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

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

Were photos taken? No Yes

Agency Referred to: _____ Agency Contact: _____

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

Content of Communication: _____

Date Corrected or Resolved: _____

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

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

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



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

For the Alliance of Downriver Watersheds MS4s

Attachment B

I. Purpose

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

II. Performing Source Investigations

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

Determining Ownership

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

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

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

Source Investigations

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

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

Attachment B

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

III. Closed Circuit Televising (CCTV)

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

IV. Smoke Testing

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

V. Dye Testing

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

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

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

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

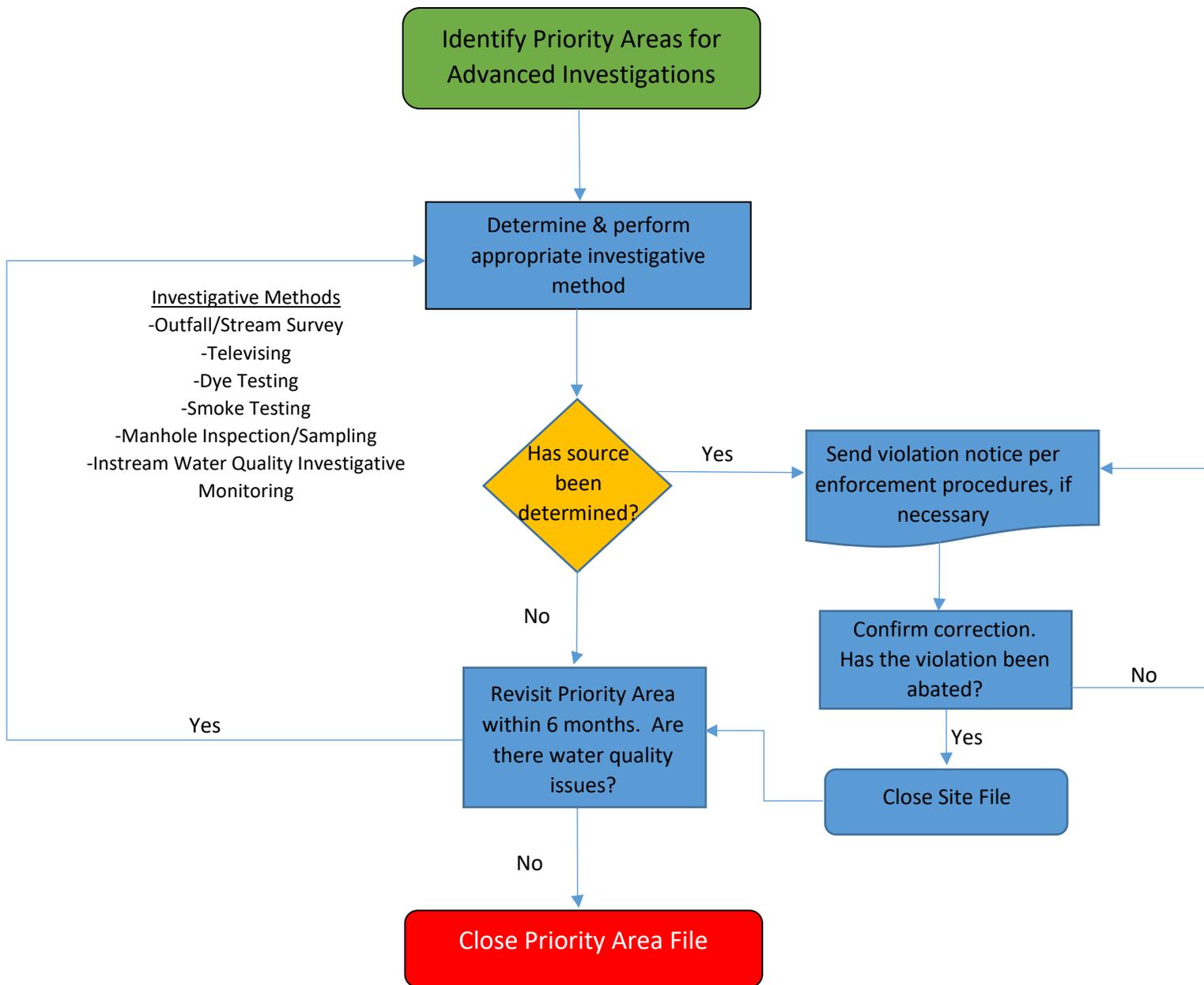
Attachment B

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

Sample dye test forms are included with this Attachment.

VI. Process for Revision

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





Alliance of Downriver Watersheds

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

Facility Information Sheet

Field Inspection Survey WMD Complaint, # _____

Date: _____

Address: _____ Community: _____

Name of Facility: _____

Type of Business: _____

Contact Person: _____ Phone Number: _____

Title: _____

SIC Code: _____ Priority: _____

Watershed: _____ Subwatershed: _____ Subarea: _____

Field Representative(s): _____

River Friendly Partners Program Information Requested: _____



Alliance of Downriver Watersheds

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

Field Inspection Results

Date: _____

Address: _____ Community: _____

Name of Facility: _____

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

- Incomplete: _____
reason

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

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

LIST ALL FIXTURES DYE TESTED:

**STORMWATER DISCHARGE
PERMIT APPLICATION**



Regional IDEP Training Program

For the Alliance of Downriver Watersheds MS4s

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

Introduction

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

Background

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

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

Objective

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

Plan

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

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

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

Cost Sharing

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

Table 1: Traditional IDEP Training Schedule and Responsibilities

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

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

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

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

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

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

Macomb County Representative

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

Oakland County Representative

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

Saint Clair County Representative

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

Washtenaw County Representative

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

Wayne County Representative

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

SEMCOG Representative

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

Alliance of Rouge Communities Representative

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

Alliance of Downriver Watersheds Representative

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



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

For the Alliance of Downriver Watersheds MS4s

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



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

For the Alliance of Downriver Watersheds MS4s

Attachment E

I. Purpose

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

II. Performing Field Observations at Outfalls

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

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

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

III. Performing Field Screening

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

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

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

Attachment E

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

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

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

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

Table 1 – Guidance for Screening Results

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

IV. Process for Revision

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

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

**STORMWATER DISCHARGE
PERMIT APPLICATION**



**Corrective Action Notification
Sample Letter**

For the Alliance of Downriver Watersheds MS4s

Attachment F

NOTICE OF ILLEGAL DISCHARGE OR CONNECTION SAMPLE LETTER

<Person or Business Name>

<Address Line 1>

<Address Line 2>

Dear <Property Owner>:

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

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

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

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

Sincerely,

<Name>

<Title>

**STORMWATER DISCHARGE
PERMIT APPLICATION**



State and Federal Regulatory Mechanisms

For the Alliance of Downriver Watersheds MS4s

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

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

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

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



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

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

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

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



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

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

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

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



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

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

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

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



Release Notification Requirements in Michigan*

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

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

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

Acronyms used in table:

AQD = Air Quality Division

AST = Above Ground Storage Tank

CAA = Clean Air Act

CAFO = Concentrated Animal Feeding Operation

CERCLA = Comprehensive Environmental Response, Compensation

and Liability Act of 1980

CFR = Code of Federal Regulations

CWA = Clean Water Act

DEQ = Michigan Department of Environmental Quality

DOT = Department of Transportation

EHS = Extremely Hazardous Substance

EPA = U. S. Environmental Protection Agency

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

FIFRA = Federal Insecticide, Fungicide, & Rodenticide Act

FL/CL = Flammable and combustible liquids

FR = Federal Register

HAP = Hazardous Air Pollutant

HazMat = Hazardous Materials

HB = House Bill

LARA = Michigan Department of Licensing & Regulatory Affairs

LEPC = Local Emergency Planning Committee

LNG = Liquefied Natural Gas

LPG = Liquefied Petroleum Gas

MCL = Michigan Compiled Laws

MDARD = Michigan Department of Agriculture & Rural Development

MIOSHA = Michigan Occupational Safety and Health Administration

MSP = Michigan Department of State Police

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

NREPA = Natural Resources & Environmental Protection Act

ODWMA = Office of Drinking Water & Municipal Assistance

OOGM = Office of Oil, Gas, and Minerals

OPS = Office of Pipeline Safety (US DOT)

OSC = On Scene Coordinator

OWMRP = Office of Waste Management & Radiological Protection

PA = Public Act (Michigan)

PCB = Polychlorinated biphenyl

PEAS = Pollution Emergency Alerting System

PHMSA = Pipeline & Hazardous Materials Safety Administration

RMP = Risk Management Program

RRD = Remediation and Redevelopment Division

SARA = Superfund Amendments and Reauthorization Act of 1986

SERC = State Emergency Response Commission

TRI = Toxic Chemical Release Inventory

TSCA = Toxic Substance Control Act

TSDF = Treatment, Storage & Disposal Facility

US DOT = U.S. Department of Transportation

USNRC = U. S. Nuclear Regulatory Commission

UST = Underground Storage Tank

WRD = Water Resources Division

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

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

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



ATTACHMENT H

ILLICIT DISCHARGE PROHIBITION POLICY

PREPARED FOR:

CHARTER TOWNSHIP OF VAN BUREN TOWNSHIP
46425 TYLER, VAN BUREN TOWNSHIP, MICHIGAN 48111



APRIL 2019

SECTION A – PURPOSE

This procedure demonstrates that Van Buren Township has adequate mechanisms in place to prohibit unauthorized, non-stormwater discharges into their storm sewer as required by the state in the municipal separate stormwater sewer system (MS4) permit program. All Township owned MS4s are located on Township property. As other entities are not allowed to connect, only Township-managed property discharge to their MS4. As such, the Township is solely responsible for the investigation, inspection, monitoring, and elimination of all suspected illicit discharges.

SECTION B - DEFINITIONS

Illicit Discharge

An illicit discharge is any discharge to, or seepage into, an MS4 that is not composed entirely of stormwater or uncontaminated groundwater except discharges that are authorized under a NPDES permit. A discharge that originates from the applicant's property and meets the illicit discharge definition is an illicit discharge.

Illicit Connection

A physical connection to an MS4 that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4; or a physical connection not authorized or permitted by the Township.

SECTION C – ALLOWABLE NON-STORMWATER DISCHARGES

The following non-stormwater flows can be discharged to the MS4 so long as they are not a significant contributor to violations of water quality standards:

- a. Discharges and flows from firefighting activities;
- b. Water line flushing and discharges from potable water sources;
- c. Landscape irrigation runoff, lawn watering runoff, and irrigation waters;
- d. Diverted stream flows and flows from riparian habitats and wetlands;
- e. Rising groundwaters and springs;
- f. Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits;
- g. Foundation drains, water from crawl space pumps, footing drains and basement sump pumps;
- h. Air conditioning condensation;
- i. Waters from noncommercial car washing; and
- j. Street/parking lot wash water.

SECTION D – PROHIBITION OF ILLICIT DISCHARGES

The Township prohibits illicit discharges, including illicit connections, direct dumping or disposal of materials, into the Township's storm sewer system. This includes the construction or continued existence of illicit connections to the Township's MS4. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the

connection was permissible under law or practices applicable or prevailing at the time of connection.

A person is considered to be in violation of this procedure if the person connects a line conveying sewage to the Township's MS4 or allows such a connection to continue. If an illicit discharge or illicit connection is found emanating from the Township's property, it will be removed/corrected. Improper connections must be disconnected and redirected, if necessary, to an approved onsite wastewater management system or the sanitary sewer system upon approval of the Township.

Any drain or conveyance that has not been documented in plans, maps or equivalent, and which may be connected to the Township's MS4, shall be located by the owner or occupant of the property upon receipt of written notice of violation from the Township requiring that such locating be completed. Such notice will specify reasonable time within which the location of the drain or conveyance is to be determined, that the drain or conveyance be identified as storm sewer, sanitary sewer or other, that a point of connection to the proper storm or sanitary sewer system be identified and that the proper connection be completed. Results of these investigations are to be documented and provided to the Township.

SECTION E – PROCESS FOR REVISION

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

STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

VAN BUREN TOWNSHIP
46425 TYLER,
VAN BUREN TOWNSHIP, MICHIGAN 48187



APRIL 2017 (REVISED OCT 2019)

STANDARD OPERATING PROCEDURE
ENFORCEMENT RESPONSE

SECTION A – PURPOSE

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

SECTION B – GENERAL PENALTY

This section describes the general penalties in place for municipal civil infractions and/or any ordinance or regulatory mechanism violations.

Sec. 1-13. - General penalty for violation of Code; continuing violations.

- (a) Unless another penalty is expressly provided by this Code for any particular provision or section, every person convicted of a violation of any provision of this Code, or any rule or regulation adopted or issued pursuant thereto, shall be punished by a fine of not more than \$500.00 and costs of prosecution, or by imprisonment for a term not exceeding 90 days, or by both such fine and imprisonment. Each act of violation and every day upon which any such violation shall occur shall constitute a new and separate offense.
- (b) In addition to the penalties provided in subsection (a) of this section, the township may enjoin or abate any violation of this Code by appropriate action.
- (c) Any person under 17 years of age convicted of a violation of this Code shall be guilty of a municipal civil infraction (except for violations of Chapter 82, Traffic and Vehicles), punishable by a fine of not more than \$500.00 in the discretion of the court regardless of any penalty provisions that may be stated in a specific chapter, section or subsection of this Code.

SECTION C – PART 91 COUNTY ENFORCEMENT AGENCY

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

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

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

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

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

(b) Repeat offenses; increased fines. Increased fines may be imposed for repeat offenses. As used

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

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

(c) Amount of fines.

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

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

For violation of any provision of this ordinance:

First offense\$250.00

First repeat offense\$500.00

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

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

- (d) Authorized county officials. The following persons are "authorized county officials" for purposes of issuing municipal civil infraction citations (directing alleged violators to appear in district court) or municipal civil infraction violation notices (directing alleged violators to appear at the Wayne County Municipal Ordinance Violations Bureau) for violations under this chapter: the Director of the Department of Environment and his or her designees and authorized representatives; the Land Resource Management Division Director and his or her designees and authorized representatives; and the Wayne County Sheriff and his or her designees and authorized representatives.*
- (e) Except as otherwise provided by this section, the procedures for municipal civil infraction actions shall be as set forth in Chapter 2 ("Municipal Civil Infractions") of the Wayne County Code.*
- (f) The recommended timeframe for notifying violators of violations is within 1-2 business days and it is recommended that violations are corrected within 30 days.*

SECTION D – ENFORCEMENT TRACKING

Van Buren Township will track all violations and issued permits. The following information will be collected and used for tracking records for each violation that is imposed by Van Buren Township.

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

SECTION E – PROCESS FOR REVISION

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

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

GENERAL PROCEDURES

VAN BUREN TOWNSHIP
46425 TYLER ROAD
VAN BUREN TOWNSHIP, MICHIGAN 48187



APRIL 2017

SECTION A – PURPOSE

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

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

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

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

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

SECTION C– UPDATES AND PRIORITY REVISION

This inventory shall be updated within 60 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments shall be revised within 60 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

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

Table 1: Van Buren Township Owned or Operated Properties with Stormwater Controls*

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPS Facility	Underground Storage Tank (1)	Med	1	Secondary Containment, Tertiary Containment.
Township Hall	Detention Basin (1)	Low	1	Detention Basin Maintenance
Fire Station 1	Catch Basins (3) Underground Detention (1) Oil/Water Separator (1)	Med	1,3	Catch Basin/Separator Cleaning Detention Basin Maintenance
Fire Station 2	Catch Basins (6) Detention Basin (1)	Med	1,3	Catch Basin Cleaning Detention Basin Maintenance
Beck Ball Fields	Vegetated Swale	Low		Swale Maintenance

*Addresses below

In addition to the properties in Table 1, Van Buren Township also owns other property/lots with no structural stormwater controls. These include: Belleville Area Museum, Soop Cemetery, Denton Cemetery, Otisville Cemetery, Tyler Cemetery, Old Fire Station 2, Fire Station 3, Van Buren Park, French Landing Park, Haggerty Neighborhood Park, Riggs Heritage Park, Quirk Park, and the VBT Water Tower.

DPS Facility – 46425 Tyler Road, Van Buren, Michigan 48111

Township Hall – 46425 Tyler Road, Van Buren, Michigan 48111

Fire Station #1 – 45400 Hull Rd, Van Buren, Michigan 48111

Fire Station #2 – 7981 Belleville Rd, Van Buren, Michigan 48111

Beck Ball Fields – 10200 Beck Road, Van Buren, Michigan 48111

SECTION E –SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

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

Van Buren Township does not operate any high priority sites with high potential for pollutant runoff.

SECTION F –CATCH BASIN MAINTENANCE PRIORITY

As a Township, Van Buren is only responsible for catch basin maintenance at our own facilities.

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

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

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

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

SECTION G – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING

Catch basins are visually inspected during normal work activities. A visual inspection of the structure will identify any structural defects which may include collapse, cracking, frame damage, pipe collapse, blockage, etc. and will be documented using a standardized form. Catch basin structures in need of structural repairs are identified during the inspection and regular maintenance process based on the results of visual assessments conducted by the Township. Structure repairs are prioritized based on public safety concerns. Staff utilize a vactor truck to remove all solids and liquids from the structure to the extent possible. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property are not inspected, cleaned, or maintained by the Township. EGLE recommends that a cleaning criteria of the sump being 50% full.

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

- Number of catch basins repaired/cleaned

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

SECTION H – DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance and street sweeping activities is transported to, dewatered and disposed of at the South Huron Valley Treatment Facility.

SECTION I – STREET SWEEPING PRIORITIZATION

Van Buren Township is only responsible for street sweeping at our own facilities. Township owned parking lots will be evaluated yearly and swept as needed.

SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS

Van Buren Township maintains only our own limited facilities.

J.1 Detention Basin/Underground Detention Inspections

Detention basins that are owned and operated by the Township are inspected on a 5-year cycle. Inspections should assess the vegetation, erosion, flow channelization, bank stability, inlet/outlet conditions, embankment, and sediment and debris accumulations. Sediment should be removed from the basin forebay. If it is determined that maintenance activities are needed, the Township will document the needed maintenance actions using a standardized inspection form and perform any maintenance activities as needed.

J.2 Underground Detention Inspections

Underground detention systems that are owned and operated by the Township are inspected on a 5-year cycle. Inspections should assess the inlet/outlet conditions and sediment and debris accumulations. Sediment should be removed from the system. If it is determined that maintenance activities are needed, the Township will document the needed maintenance actions using a standardized inspection form and perform any maintenance activities as needed.

J.3 Vegetated Swales

Vegetated Swales that are owned and operated by the Township are inspected on a yearly cycle. Inspections should assess the inlet/outlet conditions and sediment and debris accumulations. Sediment should be removed from the system. If it is determined that maintenance activities are needed, the Township will document the needed maintenance actions using a standardized inspection form and perform any maintenance activities as needed.

The Township does not have any other structural controls that are owned or maintained by the Township. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 60 days.

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

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

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

SECTION K – NEW APPLICANT OWNED FACILITIES

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

SECTION L – CERTIFIED PESTICIDE APPLICATOR

The DPS Department does not have a certified pesticide applicator on staff and does not apply or store commercial grade pesticides or fertilizers. In the event the application of pesticides or fertilizers is needed, the Township retains the services of a licensed applicator.

SECTION M – EMPLOYEE TRAINING

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

Employees Trained	Training Description and Frequency
New DPS Employees	Upon hire, employees will: <ul style="list-style-type: none"> • View the Municipal Storm Water Pollution Prevention Storm Watch training video. • Read and become familiar with the Township’s SOPs. • Participate in a job shadow program where new staff is paired with an experienced staff member for 30 days.
All DPS Field Employees	Annually, employees will: <ul style="list-style-type: none"> • View the Municipal Stormwater Pollution Prevention Storm Watch training video. • Review proper materials storage and handling. • Review good housekeeping and pollution prevention practices. • Review examples of illicit discharges to the storm sewer system • Review Township Spill Response Procedures
Key staff	Once per permit cycle: <ul style="list-style-type: none"> • Attendance of key staff to relevant training workshops by the Alliance of Downriver Watersheds, Wayne County, SEMCOG, MDEQ, or others, when available.

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

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

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

SECTION N – CONTRACT REQUIREMENTS AND OVERSIGHT

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

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

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

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

SECTION O – PROCESS FOR REVISION

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

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

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

Van Buren Township - MS4

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

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

Section*	SWMP Actions for Buren Township	Van	Biota (Flow, sedimentation) TMDL	Bacteria (E.coli) TMDL
P2GH	<i>Regulated Municipal Facility – Assessment of Potential for Pollutant Discharge</i>		G	G
P2GH	<i>Catch basin cleaning</i>		H	M
P2GH	<i>Lot sweeping</i>		M	L
P2GH	<i>Litter collection</i>		G	G
P2GH	<i>Proper Handling & Disposal of Operation and Maintenance Waste</i>		M	L
P2GH	<i>Employee/Contractor Training</i>		G	G
P2GH	<i>Staff Certifications</i>		G	G
P2GH	<i>IDEP Training</i>		G	G
P2GH	<i>Management of publicly-owned, vegetated properties</i>		M	L

* Key:

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

Michigan Department of Environmental Quality – Water Resources Division
STORMWATER DISCHARGE PERMIT APPLICATION

Table 1 – Outfall and Point of Discharge Information

An identification number shall be provided for each outfall and point of discharge. Please note that the latitude and longitude is not required as part of the application. When entering a point of discharge, the receiving water is the point where the stormwater enters a surface water of the state. The following definitions apply to these terms:

- **Outfall** means a discharge point from an MS4 directly to surface waters of the state
- **Point of Discharge** means a discharge from an MS4 to an MS4 owned or operated by another public body

A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input checked="" type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.: VBT-001 - Van Buren Township Hall
B. Receiving Water:	Receiving Water : Wayne County Roads Storm Sewer	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input checked="" type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.: VBT-002 - Fire Station #1
B. Receiving Water:	Receiving Water : Wayne County Roads Storm Sewer	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input checked="" type="checkbox"/> Outfall <input type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.: VBT-003 - Fire Station #2
B. Receiving Water:	Receiving Water : Wayne County Drain - Strong Drain	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.:
B. Receiving Water:	Receiving Water:	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.:
B. Receiving Water:	Receiving Water :	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.:
B. Receiving Water:	Receiving Water :	
C. Latitude/Longitude (Optional)	Latitude:	Longitude:
A. Outfall/ Point of Discharge No.:	<input type="checkbox"/> Outfall <input type="checkbox"/> Point of Discharge	Outfall/Point of Discharge Identification No.:
B. Receiving Water:	Receiving Water :	
C. Latitude/Longitude (Optional)	Latitude:	Longitude: