

# **WOODHAVEN-BROWNSTOWN SCHOOL DISTRICT**

## **STORM WATER MANAGEMENT PROGRAM (SWMP) &**

**PERMIT NO. MI0060064**

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



## **AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

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

**Woodhaven-Brownstown School District**  
24975 Van Horn Road  
Flat Rock, MI 48134

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

version 1.8

(Submission #: 2Q0-GZNX-BWJC, version 3)

## Details

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**Submission ID** 2Q0-GZNX-BWJC  
**Submission Reason** Renewal  
**Status** Complete

## Form Input

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### Existing Permit Details

**Existing Permit ID (Read Only)**  
5680707939689638042

**Existing Permit Number (Read Only)**  
MIG610359

### Section 1. Applicant Information

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#### Applicant Information

<b>Prefix</b> <i>Mr.</i>		
<b>First Name</b> Michael	<b>Last Name</b> <i>Belcher</i>	
<b>Title</b> <i>Director of Contracted Services</i>		
<b>Organization Name</b> <i>Woodhaven-Brownstown School District</i>		
<b>Phone Type</b> Business	<b>Number</b> 7347892862	<b>Extension</b>
<b>Email</b> belchem@wbsdweb.com		
<b>Fax</b> NONE PROVIDED		
<b>Address</b> 24821 Hall Rd Woodhaven, MI 48183 US		

### Section 2. MS4 Location Information

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

Woodhvn-Brownstwn PS MS4-Wayne

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

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

**Facility Location**

42.1258066,-83.2460461

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

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**CONTACTS**

---

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

**Contact**

Storm Water Billing Contact  
Storm Water Program Manager  
Application Contact

**Contact**

**Prefix**

Mr.

**First Name**

Michael

**Last Name**

Belcher

**Title**

Director of Contracted Services

**Organization Name**

Woodhaven-Brownstown School District

**Phone Type**

Business

**Number**

7347892862

**Extension**

**Email**

belchem@wbsdweb.com

**Fax**

NONE PROVIDED

**Address**

24821 Hall Rd

Woodhaven, MI 48183

USA

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

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**CONTACTS**

---

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

**Contact**

Storm Water Billing Contact  
Storm Water Program Manager  
Application Contact



## Contact

**Prefix**

Mr.

**First Name**

Michael

**Last Name**

Belcher

**Title**

Director of Contracted Services

**Organization Name**

Woodhaven-Brownstown School District

**Phone Type****Number****Extension**

Business

7347892862

**Email**

belchem@wbsdweb.com

**Fax**

NONE PROVIDED

**Address**

24821 Hall Rd

Woodhaven, MI 48183

USA

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

### Regulated Area

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

[Urbanized Area Link](#)

**Select an Urbanized Area**

Detroit

### Outfall and Point of Discharge Information

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

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

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

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

An example table is available at the link below.

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

**OUTFALL AND POINT OF DISCHARGE INFORMATION**

[Appendix A Outfall Table WBSD.pdf - 03/25/2017 11:33 AM](#)

**Comment**

See Appendix A

**NOTE (CREATED)**

**APPROVED**

Created on 10/22/2019 12:47 PM by **Erica Volansky**

## Nested Jurisdictions

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

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

### Nested Jurisdiction

**Prefix**

NONE PROVIDED

**First Name**

NONE PROVIDED

**Last Name**

NONE PROVIDED

**Title**

NONE PROVIDED

**Organization Name**

NONE PROVIDED

**Phone Type****Number****Extension**

NONE PROVIDED

**Email**

NONE PROVIDED

**Fax**

NONE PROVIDED

**Address**

[NO STREET ADDRESS SPECIFIED]

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

USA

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

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### STORM WATER MANAGEMENT PROGRAM (SWMP)

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

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

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

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

When answering the questions in this section of the Application, the applicant's MS4 encompasses what the applicant

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

[USEPA measurable goals guidance document link](#)

## Enforcement Response Procedure (ERP)

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

### ERP

APPENDIX B ERP\_WBSD.pdf - 03/25/2017 12:01 PM

#### Comment

See Appendix B

NOTE (CREATED)

APPROVED

Created on 10/23/2019 10:17 AM by Erica Volansky

## Public Participation/Involvement Program (PPP)

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

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

Yes

### PPP Procedures

APPENDIX C Public Participation Program WBSD.pdf - 03/13/2017 01:26 PM

#### Comment

See Appendix C for the Collaborative PPP

NOTE (CREATED)

APPROVED

Created on 10/22/2019 1:07 PM by Erica Volansky

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

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

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

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

## Section 6. Public Education Program

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

Yes

## PEP Procedures

Appendix D-ADW\_PEP\_04192019\_approved(1).pdf - 01/02/2020 09:52 AM

### Comment

See Appendix D: COLLABORATIVE PUBLIC EDUCATION PLAN

#### CORRECTION REQUEST (APPROVED)

##### Upload approved ADW PEP document.

The ADW's final PEP was approved in May 2019. This document needs to be uploaded before a permit can be issued.

Please also make sure that any application references are updated, if necessary.

Created on 10/22/2019 1:18 PM by **Erica Volansky**

#### NOTE (CREATED)

##### APPROVED

Created on 2/9/2021 4:48 PM by **Erica Volansky**

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

See Appendix D, Pg 6-7 Section III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

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

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

An example PEP table is available at the link below.

[PEP table example link](#)

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

See Collaborative Public Education Plan Table and Appendix D: Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3 & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity 8, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #10: Promote county household hazardous waste reduction program, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #9: Promote water resource protection workshops, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #4: Support green schools program with incentives to qualifying ADW schools, & PEP Table

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

See Appendix D: pg 15, Section VII. EVALUATION OF EFFECTIVENESS

## **Section 7. Illicit Discharge Elimination Program**

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

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

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

Yes

### **Illicit Discharge Elimination Program Procedures**

[Appendix E -ADW\\_Collaborative\\_IDEP\\_approved Feb 2019.pdf - 01/02/2020 09:54 AM](#)

[Illicit Discharge Elimination Policy - memo - 2020.01.07.pdf - 01/07/2020 01:54 PM](#)

#### **Comment**

See Appendix E

#### **CORRECTION REQUEST (APPROVED)**

##### **Upload approved ADW IDEP.**

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

Created on 10/22/2019 1:20 PM by **Erica Volansky**

#### **NOTE (CREATED)**

##### **APPROVED**

See uploaded IDEP policy in addition to collaborative IDEP in the application.

Created on 2/9/2021 4:49 PM by **Erica Volansky**

## Storm Sewer System Map

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

District Support Services Office

### **Illicit Discharge Identification and Investigation**

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

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

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

See Appendix E: 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.**

See Appendix E: 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.**

See Appendix E: IDEP #7 "The District additionally will perform one full dry weather screening of all district owned outfalls during the permit cycle."

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

See Appendix E: Protocol Flow Chart & Field Screening Procedure

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

See Appendix E: IDEP #6

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

See Appendix E: IDEP #2 & #7

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

See Appendix E: IDEP #7

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

See Appendix E: Release Notification Requirements

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

NONE PROVIDED

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

See Appendix E: Protocol Flow Chart

## **IDEP Training and Evaluation**

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

- Techniques for identifying an illicit discharge or connection, including field observation, field screening, and source investigation.
- Procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.
- The schedule and requirement for training at least once during the term of this permit cycle for existing staff and within the first year of hire for new staff.

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

See Appendix E: IDEP #4

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

See Appendix E: IDEP #10

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

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

See Appendix E: Legal Authority

**CORRECTION REQUEST (APPROVED)**

**The school district must submit a regulatory mechanism that addresses Q. 20 - 26.**

Please see Page 11 of the attached IDEP guidance document. Public institutions, such as school systems, are required to develop a regulatory mechanism that prohibit non-stormwater discharges, regulate the contribution of pollutants, prohibit illicit discharges, and require enforcement of illicit discharges. The School Board should then approve the SWMP. Please see attached examples of acceptable regulatory mechanisms developed by other school systems as well as an example board resolution.

Created on 10/22/2019 1:52 PM by **Erica Volansky**

**1 COMMENT**

**Brent Florek (bflorek@charlesraines.com) (1/7/2020 1:53 PM)**

The District is in the process of adopting the WBSD ILLICIT DISCHARGE ELIMINATION POLICY, which is crafted from the example language you have provided as attached reference (Troy Example)- See attached District Superintendent Memo

**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.**

N/A - See Appendix B ERP

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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP



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.

N/A - See Appendix B ERP

## Section 8. Construction Storm Water Runoff Control Program

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

No

### Qualifying Local Soil Erosion and Sedimentation Control Programs

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

27. Is the applicant a Part 91 Agency?

No

If yes, choose type

NONE PROVIDED

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

Wayne County Land Resources Management Division (LRMD)

### Construction Storm Water Runoff Control

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

[Appendix F-Part91 WBSD.pdf - 01/02/2020 10:19 AM](#)

##### Comment

Appendix F

NOTE (CREATED)

**APPROVED**

Created on 2/9/2021 5:00 PM by Erica Volansky

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

See Appendix F, Page 2, Section B

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

See Appendix F, Page 2, Section B & Page 3, Section D

**CORRECTION REQUEST (APPROVED)**

**Indicate when EGLE will be contacted.**

Please state in Section D how soon after a discharge is identified that EGLE will be contacted. EGLE recommends that the PEAS hotline is called immediately after becoming aware of a reportable discharge event. Also update App H - Spill Response Section C with this information.

Created on 10/28/2019 11:47 AM by **Erica Volansky**

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

See Appendix F, Page 2, Section B

**CORRECTION REQUEST (APPROVED)**

**Include construction activity within 500 feet of waterbody.**

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

Created on 10/28/2019 11:26 AM by **Erica Volansky**

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

See Appendix F, Page 3, Section E

## **Section 9. Post-Construction Storm Water Runoff Program**

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

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

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

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

[Appendix G\\_POSTCONSTRUCTION\\_WBSD.pdf - 03/30/2017 11:20 AM](#)

[Existing Controls\\_Storm Water Resolution.pdf - 03/30/2017 11:20 AM](#)

[Existing -Storm\\_Water\\_Ordinance06.pdf.pdf - 03/30/2017 11:20 AM](#)

**Comment**

See Appendix G & Existing Stm Water Runoff Program

**NOTE (CREATED)**

**APPROVED - New resolution required 2020**

When the school district does adopt the new Wayne County post-construction ordinance, just the signed board resolution will need to be provided.

Created on 10/28/2019 12:55 PM by **Erica Volansky**

## **Ordinance or Other Regulatory Mechanism**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Federal Facilities**

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

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

No, skip to Question 36

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

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

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

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

NONE PROVIDED

#### **Water Quality Treatment Performance Standard**

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

NONE PROVIDED

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

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

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

#### **Sources**

NONE PROVIDED

**Other rainfall data source (page and paragraph of attachments)**

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Channel Protection Performance Standard**

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

or redevelopment. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

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

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

### **Site-Specific Requirements**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Site Plan Review**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

NONE PROVIDED

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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## Pollution Prevention and Good Housekeeping Program Procedures

[Appendix H Inventory 2of3.pdf](#) - 03/30/2017 05:29 PM

[WBSD Vehicle Fueling Procedure.pdf](#) - 03/30/2017 05:30 PM

[Appendix H PPGH\\_3of3 WBSD.pdf](#) - 01/02/2020 10:16 AM

[WBSD MS4 Inspection and Maintenance Field Sheets.pdf](#) - 01/03/2020 09:17 AM

[Appendix H PPGH\\_GENERAL\\_1of3 WBSD.pdf](#) - 01/08/2020 10:40 AM

[Support Services Building SWPPP SPCC PIPP.pdf](#) - 01/08/2020 10:41 AM

[Environmental Awareness Training.pdf](#) - 01/08/2020 10:41 AM

[Spill Prevention Training.pdf](#) - 01/08/2020 10:42 AM

### Comment

See Appendix H

NOTE (CREATED)

APPROVED

Created on 2/9/2021 5:02 PM by Erica Volansky

## Municipal Facility and Structural Storm Water Control Inventory

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

See Appendix H: PPGH General Table 1 & Appendix H Inventory

CORRECTION REQUEST (APPROVED)

**Location of facilities is missing.**

Each facility needs to have an address. Please correct.

Created on 10/28/2019 5:03 PM by Erica Volansky

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

Bus Stations and Garages

Fleet maintenance facilities

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

Public parking lots

Public schools

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

Catch basins

Detention basins

Oil/water separators

Secondary containment

**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)**

The Support Services Office 23793 Van Horn Road, Brownstown, MI 48134-9231

**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.**

See Appendix H: PPGH General, Section C



**CORRECTION REQUEST (APPROVED)**

**Timeframe for updating inventory is too long.**

The timeframe for updating/revising the inventory is too long. EGLE recommends a timeframe of 30 days. Please correct.  
Created on 10/28/2019 4:35 PM by **Erica Volansky**

**Facility-Specific Storm Water Management**

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

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

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

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

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

See Appendix H: PPGH General, Section B, Section D & Table 1

**If not applicable**

NONE PROVIDED

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

See Appendix H: PPGH General, Section D & Table 1

**CORRECTION REQUEST (APPROVED)**

**The Support Services Facility should be considered a high priority facility.**

Although bus washing and all equipment repairs are conducted inside the building, there are stockpiles stored on-site as well as above-ground storage tanks. This would qualify the Facility for site-specific operating procedures. Please update Section D and Table 1 to state this.

Created on 10/28/2019 5:30 PM by **Erica Volansky**

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

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



**CORRECTION REQUEST (APPROVED)**

**Please provide a SOP for the Support Services Facility.**

See correction request for Q. 64.

Created on 10/28/2019 5:33 PM by Erica Volansky

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

**CORRECTION REQUEST (APPROVED)**

**Update references for Q. 65 - 69.**

After submitting the SOP for the Support Facility, please update the references for Q. 65 - 69 to refer to the appropriate sections of the SOP.

Created on 10/28/2019 5:35 PM by Erica Volansky

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Appendix H: PPGH General, Section D & Table 1

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

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

See Appendix H: PPGH General, Section F, Section G, & Section H

**CORRECTION REQUEST (APPROVED)**

**Missing Section H.**

Please include Section H in the General Procedures SOP.  
Created on 10/29/2019 11:10 AM by **Erica Volansky**

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

See Appendix H: PPGH General, Section F

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Appendix H - Structural Control Inventory provides the geographic location of the catch basins. Please edit the reference to state this.

Created on 10/29/2019 11:12 AM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section F, Section G, Section H, and attached WBSD MS4 Inspection and Maintenance Field Sheets

**CORRECTION REQUEST (APPROVED)**

**Provide standardized form used in catch basin inspections.**

Under Section G a standardized form is referenced when inspecting catch basins. Please provide this form for review.

Created on 10/29/2019 11:20 AM by **Erica Volansky**

**CORRECTION REQUEST (APPROVED)**

**Measurable goals are missing.**

Under Section G of the General SOP, there is a space for measurable goals but it has none listed. Please edit the document to include measurable goals.

Created on 10/29/2019 11:15 AM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section G & Section H

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

See Appendix H: PPGH General, Section J

**CORRECTION REQUEST (APPROVED)**

**Missing Section J.**

Please include Section J in the General Procedures SOP.  
Created on 10/29/2019 11:13 AM by **Erica Volansky**

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

See Appendix H: PPGH General, Section K and Section J

**CORRECTION REQUEST (APPROVED)**

**Missing Section K.**

Please include Section K in the General Procedures SOP.  
Created on 10/29/2019 11:16 AM by **Erica Volansky**

## **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):**

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

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

See Appendix H: PPGH General, Section E

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Please refer to the WBSD Vehicle Fueling SOP.  
Created on 10/29/2019 11:22 AM by **Erica Volansky**

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

See Appendix H: PPGH General, Section I & H

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

See Appendix H: PPGH General, Section I & H

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

See Appendix H: PPGH General, Section I & H

**CORRECTION REQUEST (APPROVED)**

**Measurable goals are missing.**

Under Section G of the General SOP, there is a space for measurable goals but it has none listed. Please edit the document to include measurable goals.

Created on 10/29/2019 11:42 AM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section H

### **Managing Vegetated Properties**

---

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

[Commercial Pesticide Application Certification Categories](#)

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

See Appendix H: PPGH General, Section L

### **Contractor Requirements and Oversight**

---

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

See Appendix H: PPGH General, Section N

### **Employee Training**

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

See Appendix H: PPGH General, Section M

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

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

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

## Total Maximum Daily Load Implementation Plan

Appendix I-adw\_tmdl\_plan\_2019\_final egle.pdf - 01/02/2020 11:22 AM

WBSD-ADW-TMDL-MS4-Plan-Priority-Action-Table (1).pdf - 02/11/2020 07:50 AM

### Comment

See Appendix I

#### CORRECTION REQUEST (APPROVED)

##### Upload most recent TMDL.

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

Created on 10/28/2019 12:57 PM by **Erica Volansky**

#### NOTE (CREATED)

##### APPROVED

Created on 2/9/2021 5:02 PM by **Erica Volansky**

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

Yes

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

See Appendix I: Section I. TMDL AND MS4 COVERAGE- Detroit River-TMDL for E.coli, Wayne, Oakland, and Washtenaw Counties

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

See Appendix I: Section II. PRIORITIZING AND IMPLEMENTATION BMPS

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

See Appendix I: SWMP Priority Actions for TMDL Progress

#### CORRECTION REQUEST (APPROVED)

##### Provide the list of BMPs implemented.

The ADW TMDL should have a BMP table for the school district's use. The table prioritizes the BMPs over the whole watershed area but the school district needs to indicate how they intend to prioritize the BMPs. Please complete and upload.

Created on 2/6/2020 4:51 PM by **Erica Volansky**

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

See Appendix I: Section III Monitoring Plan

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

## Industrial Facility Inspection Program Procedures

NONE PROVIDED

### Comment

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

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

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

NONE PROVIDED

## Section 13. Certify and Submit

### Comments (As needed)

NONE PROVIDED

### Additional Documents (As needed)

NONE PROVIDED

#### Comment

NONE PROVIDED

## Attachments

Date	Attachment Name	Context	User
2/11/2020 7:50 AM	WBSD-ADW-TMDL-MS4-Plan-Priority-Action-Table (1).pdf	Attachment	Brent Florek
1/8/2020 10:42 AM	Spill Prevention Training.pdf	Attachment	Brent Florek
1/8/2020 10:41 AM	Envirnmental Awareness Training.pdf	Attachment	Brent Florek
1/8/2020 10:41 AM	Support Services Building SWPPP SPCC PIPP.pdf	Attachment	Brent Florek
1/8/2020 10:40 AM	Appendix H PPGH_GENERAL_1of3 WBSD.pdf	Attachment	Brent Florek
1/7/2020 1:54 PM	Illicit Discharge Elimination Policy - memo - 2020.01.07.pdf	Attachment	Brent Florek
1/3/2020 9:17 AM	WBSD MS4 Inspection and Maintenance Field Sheets.pdf	Attachment	Brent Florek
1/2/2020 11:22 AM	Appendix I -adw_tmdl_plan_2019_final egle.pdf	Attachment	Brent Florek
1/2/2020 10:19 AM	Appendix F-Part91 WBSD.pdf	Attachment	Brent Florek
1/2/2020 10:16 AM	Appendix H PPGH_3of3 WBSD.pdf	Attachment	Brent Florek
1/2/2020 9:54 AM	Appendix E -ADW_Collaborative_IDEP_approved Feb 2019.pdf	Attachment	Brent Florek
1/2/2020 9:52 AM	Appendix D-ADW_PEP_04192019_approved(1).pdf	Attachment	Brent Florek
10/28/2019 11:26 AM	Permit by Rule deq-wrd-stormwater-construction-NPTDguidance_453910_7.pdf	Correction Request	Erica Volansky
10/22/2019 3:47 PM	EXAMPLE Board Resolution.pdf	Correction Request	Erica Volansky
10/22/2019 3:47 PM	EXAMPLE IDEP Regulatory Mechanism.pdf	Correction Request	Erica Volansky
10/22/2019 1:52 PM	wrd-storm-MS4-IDEP-ComplianceAssistance_473378_7.pdf	Correction Request	Erica Volansky
3/30/2017 5:30 PM	WBSD Vehicle Fueling Procedure.pdf	Attachment	Brent Florek
3/30/2017 5:29 PM	Appendix H Inventory 2of 3.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Existing -Storm_Water_Ordinance06.pdf.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Existing Controls _Storm Water Resolution.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Appendix G _POSTCONSTRUCTION_ WBSD.pdf	Attachment	Brent Florek
3/25/2017 12:01 PM	APPENDIX B ERP_ WBSD.pdf	Attachment	Brent Florek

Date	Attachment Name	Context	User
3/25/2017 11:33 AM	Appendix A Outfall Table WBSD.pdf	Attachment	Brent Florek
3/13/2017 1:26 PM	APPENDIX C Public Participation Program WBSD.pdf	Attachment	Brent Florek

## Status History

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	User	Processing Status
2/11/2020 7:48:45 AM	Brent Florek	Draft
1/11/2021 1:16:17 PM	Michael Belcher	Submitted
7/30/2021 4:56:10 PM	Kathryn Gallagher	Complete

## Audit

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Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Volansky	10/22/2019 12:48 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	10/29/2019 11:44 AM

## Revisions

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Revision	Revision Date	Revision By
Revision 1	3/13/2017 1:06 PM	Brent Florek
Revision 2	1/2/2020 9:06 AM	Brent Florek
Revision 3	2/11/2020 7:48 AM	Brent Florek



# Appendix A

Table 1

## Discharge Point Identification

A unique ID number shall be provided for all discharge points, whether they discharge directly to waters of the state or to another jurisdiction's MS4.

If more space is needed, please make copies of this page for submission.

A. Discharge Point #/ Receiving Water:	Discharge Point # #1 (Gudith)	Receiving Water (24" STM) VAN KLEEF DRAIN			
B. Street / County:	Street 22700 Sibley Road, Brownstown, MI 48192				County Wayne
	1/4	1/4	Section	Town	Range
C. State Planar Coordinates:	Latitude N 42° 10' 10.4"		Longitude W 083° 15' 08.2"		

A. Discharge Point #/ Receiving Water:	Discharge Point # #2 (Yake)	Receiving Water (24" STM) to Carter Road WCDPS 84" STM			
B. Street / County:	Street 16400 Carter Road, Woodhaven, MI 48183				County Wayne
	1/4	1/4	Section	Town	Range
C. State Planar Coordinates:	Latitude N 42° 08' 54.0"		Longitude W 083° 13' 17.0"		

A. Discharge Point #/ Receiving Water:	Discharge Point # #3 (Woodhaven High AND Bus Garage/Support Services)	Receiving Water (15" Restricted STM) from on site detention basin to tributary to Smith Creek			
B. Street / County:	Street 24793 Van Horn Road, Brownstown, MI 48134				County Wayne
	1/4	1/4	Section	Town	Range
C. State Planar Coordinates:	Latitude N 42° 07' 9.0"		Longitude W 083° 16' 18.5"		

A. Discharge Point #/ Receiving Water:	Discharge Point # #4 (Wegienka)	Receiving Water (15" STM) to Timber Creek Blvd. 42" STM			
B. Street / County:	Street 23925 Arsenal Road, Brownstown, MI, 48134				County Wayne
	1/4	1/4	Section	Town	Range
C. State Planar Coordinates:	Latitude N 42° 07' 51.1"		Longitude W 083° 17' 20.2"		

A. Discharge Point #/ Receiving Water:	Discharge Point # #5 (Bates)	Receiving Water (12"STM) to Gudith Road 54" STM			
B. Street / County:	Street 22811 Gudith Road, Woodhaven, MI, 48183				County Wayne
	1/4	1/4	Section	Town	Range
C. State Planar Coordinates:	Latitude N 42° 08' 24.5"		Longitude W 083° 15' 04.9"		

A. Discharge Point #/ Receiving Water:	Discharge Point # #6 (Bates)	Receiving Water (18"STM) Underground Detention Emergency Overflow to Brownstown Creek			
B. Street / County:	Street 22811 Gudith Road, Woodhaven, MI, 48183				County Wayne
	Latitude N 42° 08' 24.6"		Longitude W 083° 15' 00.1"		

Table 1

## Discharge Point Identification

A unique ID number shall be provided for all discharge points, whether they discharge directly to waters of the state or to another jurisdiction's MS4. If more space is needed, please make copies of this page for submission.

A. Discharge Point #/ Receiving Water:	Discharge Point # #7 (Patrick Henry)	Receiving Water (18" STM) to Hall Road 72" STM			
B. Street / County:	Street 24825 Hall Road, Woodhaven, MI 48183				County Wayne
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude N 42° 07' 41.6"			Longitude W 083° 14' 46.2"	

A. Discharge Point #/ Receiving Water:	Discharge Point # #8 (Patrick Henry)	Receiving Water (18"STM) to Hall Road 72" STM			
B. Street / County:	Street 24825 Hall Road, Woodhaven, MI 48183				County Wayne
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude N 42° 07' 34.6"			Longitude W 083° 14' 45.3"	

A. Discharge Point #/ Receiving Water:	Discharge Point # #9 (Erving)	Receiving Water (12"STM) to Hall Road 72" STM			
B. Street / County:	Street 24175 Hall Road, Woodhaven, MI 48183				County Wayne
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude N 42° 07' 43.4"			Longitude W 083° 14' 44.4"	

A. Discharge Point #/ Receiving Water:	Discharge Point # #10 (Erving)	Receiving Water (12"STM) to Hall Road 72" STM			
B. Street / County:	Street 24175 Hall Road, Woodhaven, MI 48183				County Wayne
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude N 42° 07' 41.4"			Longitude W 083° 14' 44.7"	

A. Discharge Point #/ Receiving Water:	Discharge Point # #11(Brownstown Middle)	Receiving Water (8"STM) to Sherman Drain to Smith Creek			
B. Street / County:	Street 20135 Inkster Road, Brownstown, MI 48174				County Wayne
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude N 42° 08' 24.5"			Longitude W 083° 15' 04.9"	

A. Discharge Point #/ Receiving Water:	Discharge Point #	Receiving Water			
B. Street / County:	Street				County
C. State Planar Coordinates:	1/4	1/4	Section	Town	Range
D. Latitude/Longitude:	Latitude			Longitude	

# Appendix B

# STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



APRIL 2017

## **SECTION A – PURPOSE**

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

## **SECTION B –**

The District has full Authority of District owned Properties and will rely on City, County, State, and Federal regulatory authority for enforcement. The District will notify the appropriate agencies in the event of a violation/ pollutant incident.

## **SECTION C – ENFORCEMENT TRACKING**

The District will track the number of incidents reported to authorities. The following information will be collected and used for tracking records for each incident.

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. Agency Contacted
8. Key Dates

## **SECTION D – PROCESS FOR REVISION**

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

# Appendix C

# Public Participation Program for the Alliance of Downriver Watersheds MS4s



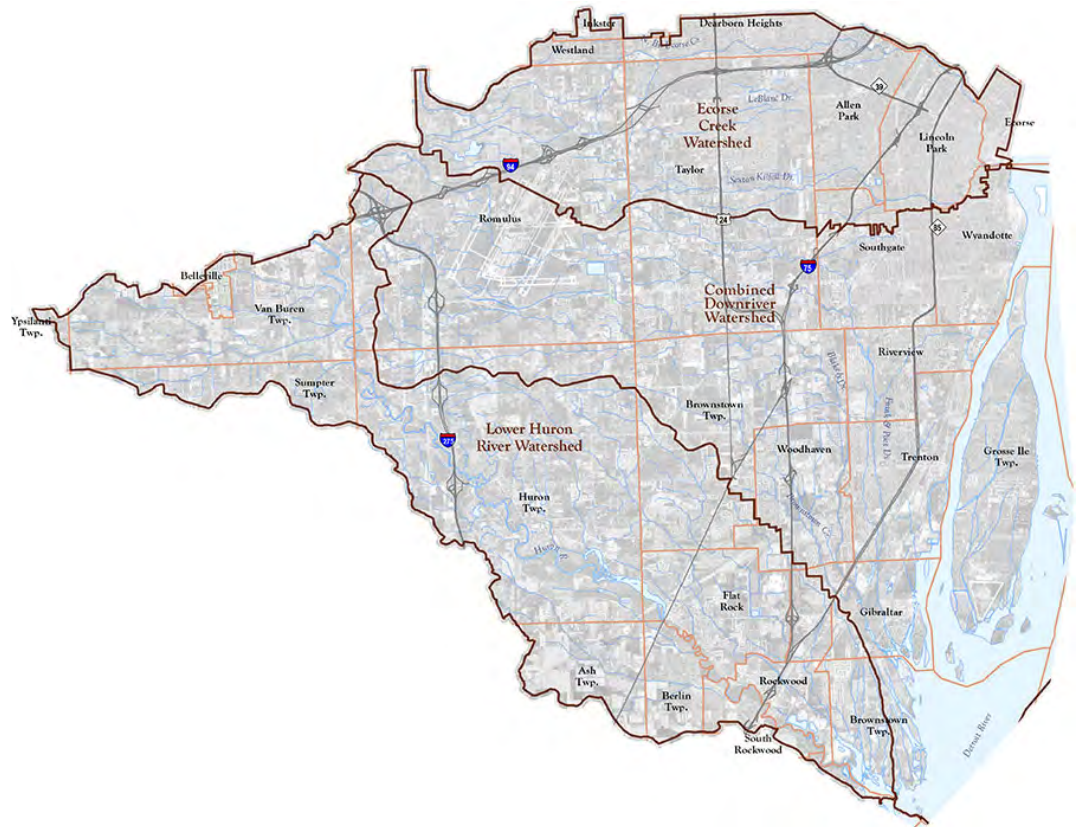
The Public Participation/Involvement Program (PPP) is required by the State of Michigan National Pollutant Discharge Elimination System (NPDES) Permit Application for Discharge of Stormwater to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4).

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

## I. GENERAL INFORMATION

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

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





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

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

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

## **II. COMMUNICATION DURING THE SWMP DEVELOPMENT PROCESS**

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

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

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

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

### **BMP 1.1. Public Notice**

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

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

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

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

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

### **BMP 1.2 Public Access to SWMPs**

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

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

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

**Responsible Parties:** The ADW and individual MS4s.

### **BMP 1.3 SWMP Implementation**

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

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

**Evaluation:** Document MS4 representative and citizen participation in meetings.

**Responsible Parties:** MS4 representatives, ADW.

### **BMP 1.4 SWMP Review**

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

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

**Evaluation:** Comments from the general public.

**Responsible Parties:** ADW and MS4s.

# Appendix D

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



## **For the Alliance of Downriver Watersheds MS4s**

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

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

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Exhibit A – Table of PEP Tasks by Topic and Activity

## I. INTRODUCTION

### Purpose of Public Education Plan

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

### Federal Phase II Storm Water Regulations

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

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

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

### Required Public Education Plan Elements

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

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

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

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

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

For all applicable topics, the PEP shall identify:

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

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

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

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

## II. COLLABORATION OF WATERSHED PARTNERS

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

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

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

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

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

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

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



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

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

### III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

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

#### Watershed-Wide Priority Topics

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

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

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

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

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

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

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

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

## IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs

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

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

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

<b>Delivery Mechanism:</b>	Coordinated by the ADW, permittees will participate in the bulk printing and distribution of a Watershed Community Calendar to residents. The calendar will include a social media-driven photo contest where residents will be encouraged to post and tag photos related to stormwater pollution-reducing behaviors on social media.
<b>Key Messages:</b>	Calendars typically feature a different tip each month for increasing public awareness of watershed issues and improving personal actions affecting the health of their watershed. Topics/messages are likely to include key messages associated with A-J of the PEP topics that are suited for homeowners, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; green infrastructure and LID; and illegal dumping in storm drains.
<b>Target Audience:</b>	Residents.
<b>Year/Frequency:</b>	Biannually (even calendar years).
<b>Goal:</b>	During the permit cycle, the ADW will collaboratively produce a biannual print calendar in even calendar years that permittees will distribute to residents. To promote a calendar-related public photo contest during even calendar years, the ADW will also produce and permittees will distribute monthly social media posts/digital ads/content. The calendar and photo contest will be posted to the ADW website and permittees will provide links from their websites to the ADW website.
<b>Assessment:</b>	Number of calendars distributed by the ADW and permittees; Number of posts/views on ADW social media sites and on the ADW website; Number of photo contest participants.

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

**Topics Addressed:** A-J

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

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

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

**Target Audience:** Residents.

**Year/Frequency:** Biannually (odd calendar years).

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

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

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

**Topics Addressed:** A-J

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

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

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

**Target Audience:** Residents, visitors, community leaders.

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

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

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

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

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

#### **Activity #6: Stream and river crossing road signs**

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

Number of new and replacement signs produced by the ADW;  
Permittees will report installation and maintenance activities.

**Responsible Parties:** ADW and local community officials, permittees.

**Topics Addressed:** A

#### **Activity #7: Participate in regional partnership activities**

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

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

**Target Audience:** Stakeholders of partner organizations.

**Year/Frequency:** 3-4 meetings annually.

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

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

**Responsible Parties:** ADW and individual permittees.

**Topics Addressed:** A-K

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

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

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

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

**Year/Frequency:** Ongoing promotional efforts.

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

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



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

#### **Activity #9: Promote water resource protection workshops**

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

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

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

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

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

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

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

#### **Activity #10: Promote county household hazardous waste reduction program**

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

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



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

## V. EXISTING AND PROPOSED INDIVIDUAL PUBLIC EDUCATION BMPs

Reported above and as follows:

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

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

## VI. OTHER INVOLVED ORGANIZATIONS

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

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

## **VII. EVALUATION OF EFFECTIVENESS**

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

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

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

## **VIII. PERIODIC PROGRESS REPORT**

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

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

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

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

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

**Permittees in the Alliance of Downriver Watersheds:**

Allen Park

Belleville

Dearborn Heights

Ecorse

Flat Rock

Gibraltar

Grosse Ile Township

Inkster

Lincoln Park

Melvindale

Riverview

Rockwood

Romulus

Southgate

Sumpter Township

Taylor

Van Buren Township

Wayne County

Westland

Woodhaven

Woodhaven-Brownstown School District

Wyandotte

STORMWATER DISCHARGE PERMIT APPLICATION  
COLLABORATIVE PUBLIC EDUCATION PLAN TABLE

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

# Appendix E



# **STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN**



## **For the Alliance of Downriver Watersheds MS4s**

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

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

Inkster  
Lincoln Park  
Melvindale  
Riverview  
Rockwood  
Romulus  
Southgate  
Sumpter Township

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

May 31, 2019

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### ATTACHMENTS

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

## I. INTRODUCTION

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

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

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

## II. PRIORITY AREAS

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

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

The criteria used to identify them as a priority included:

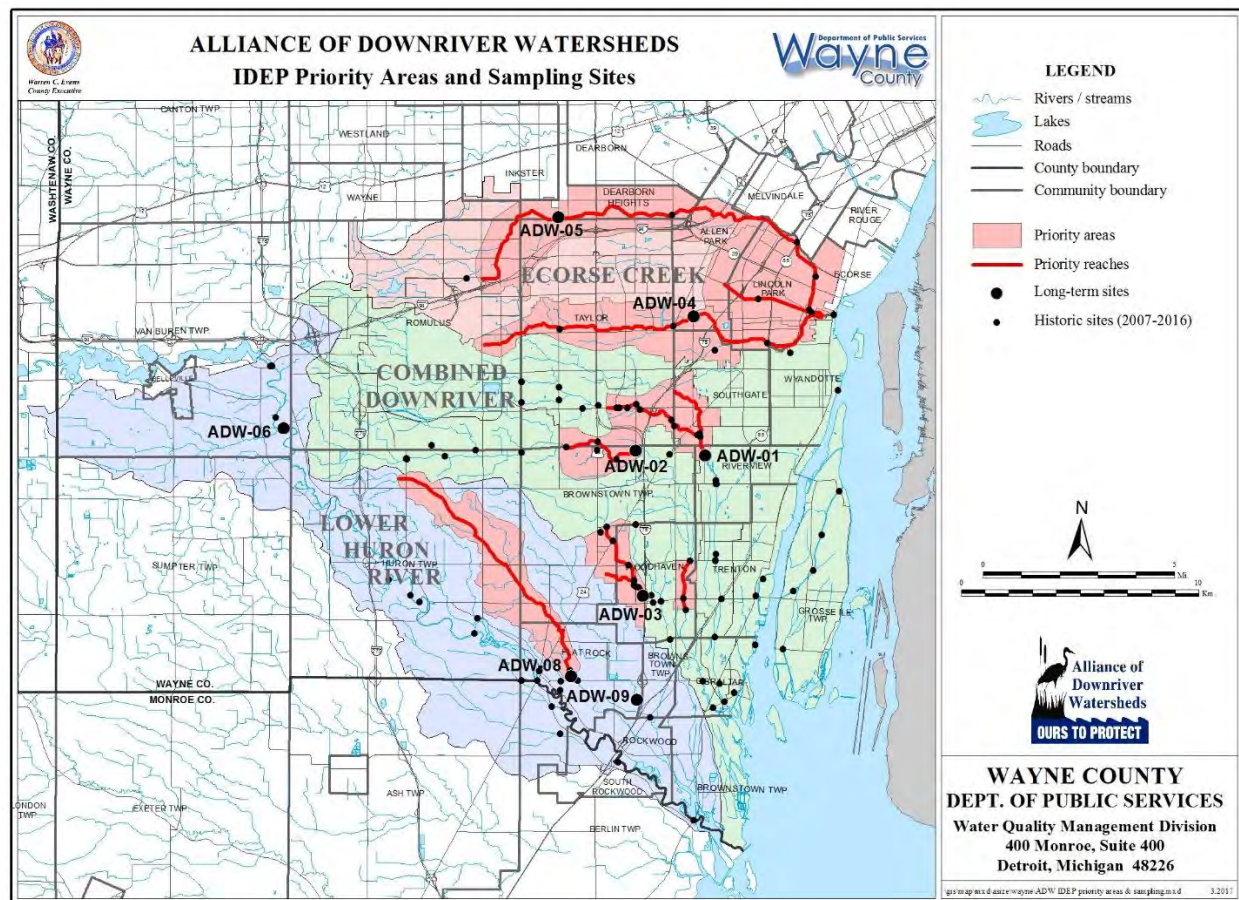
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling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

### **Priority IDEP Work Areas**

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

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

**Figure 1: IDEP Priority Work Areas and Monitoring Sites**



### Routine IDEP Areas

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

## III. COLLABORATIVE IDEP ACTIVITIES

### IDEP# 1: IDEP Investigative & Progress Evaluation Monitoring

Funding: ADW

Activity Description: Consistent with the ADW's 5-year monitoring strategy, the ADW will utilize HRWC, Wayne County, and volunteers to perform instream water quality monitoring to identify problem 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](http://www.YouTube.com). The Alert Observer Training Workshop will be included in the municipal pollution prevention training every other year according to the IDEP Training Plan (See Attachment C). Additional training opportunities can be arranged if demand warrants. The Tip Card will be distributed at the Investigator and Alert Observer trainings and can be obtained on the ADW's website.

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

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of staff trained

BMP Goals:

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

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

Funding: ADW

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

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

### ADW Member Responsibilities:

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

### Measures of Assessment:

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

### BMP Goals:

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

## **IDEP #6: Visual Inspection during Routine Field Operations**

Funding: ADW, Wayne County, and Communities

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

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

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

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

Schedule:

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

ADW Member Responsibilities:

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

Measures of Assessment:

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

BMP Goals:

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

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

Funding: Communities and nested school districts

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

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

### ADW Member Responsibilities:

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

### Measures of Assessment:

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

### BMP Goals:

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

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

Funding: ADW with Wayne County providing GIS data management

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

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

### ADW Member Responsibilities:

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

### Measures of assessment:

- Portion of watershed area with known outfalls mapped in GIS

### BMP Goal:

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

## **IDEP #9: Volunteer Training**

Funding: ADW via Public Education and Progress Evaluation budgets

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

Schedule: Annually as volunteer monitoring training occurs.

ADW Member Responsibilities:

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

Measures of Assessment:

- Number of volunteers trained

BMP Goal:

- Training held annually during each year of the permit cycle

**IDEP #10: Method to Evaluate IDEP Effectiveness**

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

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

Schedule: Continuous with summary report submitted biennially.

ADW Member Responsibilities:

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

## IV. CORRECTIVE ACTION NOTIFICATION

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

### **Discharges from Private Sources to MS4s**

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

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

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

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

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

### *Corrections/Repairs:*

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

### **Discharges from Public Properties to MS4s**

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

### **Discharges from Permittee's Properties**

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

### **Discharges from Septic Systems**

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

## **V. LEGAL AUTHORITY**

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



**Table 1. IDEP Regulatory Mechanisms Available to Permittees**

<b>Discharge Type or Source</b>	<b>Lead Enforcement Agency</b>	<b>Regulatory Authority</b>
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:  <a href="http://legislature.mi.gov/doc.aspx?mcl-280-423">http://legislature.mi.gov/doc.aspx?mcl-280-423</a></p> <p>See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at:  <a href="http://www.legislature.mi.gov/%28S%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&amp;objectName=mcl-280-421">http://www.legislature.mi.gov/%28S%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&amp;objectName=mcl-280-421</a></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><a href="http://www.waynecounty.com/hhs/onsite_sewage.htm">http://www.waynecounty.com/hhs/onsite_sewage.htm</a></p> <p><i>Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta as follows:</i></p> <ul style="list-style-type: none"> <li>-Prohibit discharges: Article III, Sec. 3.13.2</li> <li>-Right to inspect: Article IV, Sec. 4.3</li> <li>-Corrective action: Article IV, Sec. 4.5-4.7</li> <li>-Penalties: Article XVI, Sec. 16.1</li> </ul> <p><i>Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance as follows:</i></p> <ul style="list-style-type: none"> <li>-Right to inspect: Sec. 803</li> <li>-Corrective action: Sec. 802</li> <li>-Penalties: Sec. 804-815</li> </ul>

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**

<b>Discharge Type or Source</b>	<b>State or Federal Enforcement Agency</b>	<b>Regulatory Authority</b>
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987 <a href="http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-96of-1987.pdf">http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-96of-1987.pdf</a>
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:		
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

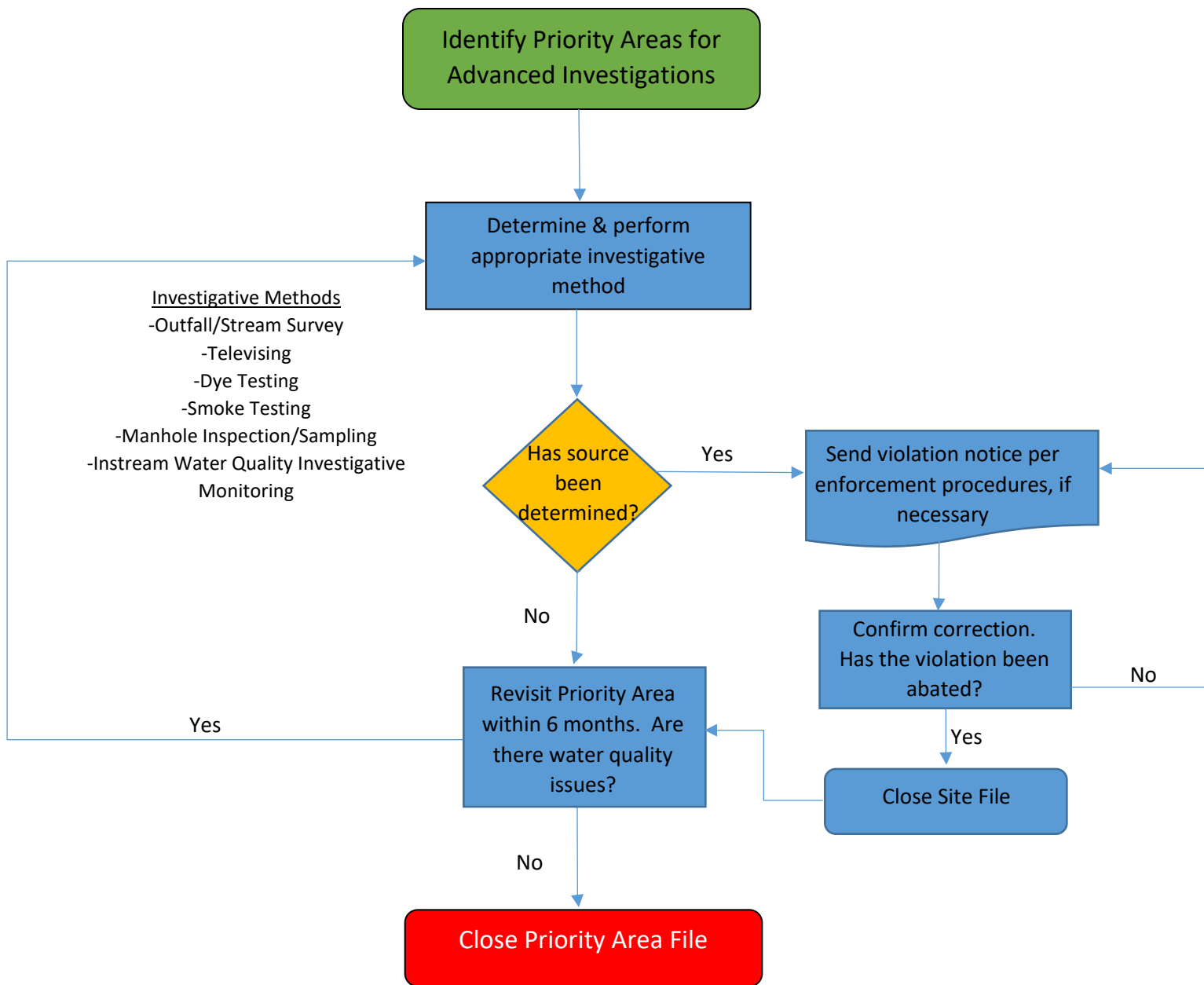
## Attachment B

- 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:

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### ***Field Inspection Results***

Date \_\_\_\_\_

**Facility:** \_\_\_\_\_

## Information to Document:

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

[illegible]







# **STORMWATER DISCHARGE PERMIT APPLICATION**



## **Regional IDEP Training Program**

**For the Alliance of Downriver Watersheds MS4s**

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

**Introduction**

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

**Background**

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

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

**Objective**

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

**Plan**

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

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

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

### Cost Sharing

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

**Table 1: Traditional IDEP Training Schedule and Responsibilities**

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

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

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

Year	Staff Cost	Facility/Refreshments <sup>3</sup>	Registration <sup>4</sup>
2014	Host County <sup>1</sup> , SEMCOG <sup>2</sup>	St. Clair County	SEMCOG
2016	Host County <sup>1</sup> , SEMCOG <sup>2</sup>	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. Mustertovich W. MUSTERTOVICH CHIEF DEPUTY MACOMB 05-17-2013  
Signature Name/Title COUNTY PUBLIC WORKS Commissioner Date

**Oakland County Representative**

James A. Winkler JAMES WINKLER 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 11 APRIL 13  
Signature Name/Title COORDINATOR 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 colormetric method such as CHEMets kit # K-9400 ([www.chemetrics.com](http://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"/> Dark				
	<input type="checkbox"/> Clear	<input type="checkbox"/> Cloudy	Brown/ Tannic	<input type="checkbox"/> Muddy	<input type="checkbox"/> Other_____		
Floatables (not including trash)			<input type="checkbox"/> Petroleum				
	<input type="checkbox"/> Paint	(oil sheen)	<input type="checkbox"/> Algae	<input type="checkbox"/> Other_____			
	<input type="checkbox"/> None	<input type="checkbox"/> Sewage	<input type="checkbox"/> Suds/bubbles				
Trash/debris	<input type="checkbox"/> Glass	<input type="checkbox"/> Yard Waste	<input type="checkbox"/> Paper	<input type="checkbox"/> Plastics			
	<input type="checkbox"/> None	<input type="checkbox"/> Mixed 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**

12/18/2018

## 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 (<b>EHS &amp; Hazardous Substances</b>)</p>	<p>Release of a CERCLA <b>hazardous</b> substance (40 CFR 302, Table 302.4) or <b>Extremely Hazardous</b> 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 &lt; 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 &amp; LEPC contact information, contact Michigan SARA Title III Program 517-284-7272</p>
<p>CERCLA Section 103 40 CFR 302 (<b>Hazardous Substances</b>)</p>	<p>Release into the environment of a CERCLA <b>hazardous</b> 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 &lt; 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 &amp; 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 <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a></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
NREPA 1994 PA 451 Part 201, <b>Environmental Remediation</b>	<p>(i) Unpermitted release into the environment over a 24-hour period of a <b>hazardous</b> 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 &amp; 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>
NREPA 1994 PA 451 Part 201, <b>Environmental Remediation</b> (Continued)	<p>(ii) The owner or operator has reason to believe that one or more <b>hazardous</b> 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 <b>hazardous</b> 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>
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (Agricultural)	<p>Release to the environment of a commercial <b>pesticide</b> &gt;5 gallons or 100 pounds.</p> <p>Reportable agrichemical spills as defined in the provisions of SARA Title III section 304 and CERCLA section 103 shall be immediately reported to PEAS and the NRC.</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 &amp; 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
NREPA 1994 PA 451 Part 85, Fertilizers Regulation 641 Commercial Fertilizer Bulk Storage Regulation 642, On Farm Fertilizer Bulk Storage (Agricultural)	Release to the environment of a commercial <b>fertilizer</b> >55 gallons liquid or 650 pounds dry, or tank overfills; or an on farm fertilizer > 55 gallons liquid.  For storage tank with bladder system instead of diking: also report all overfills and internal spills.  The term "release" excludes normal agricultural practices. The term "liquid fertilizer" excludes anhydrous ammonia.	Immediate: to MDARD by commercial bulk storage facility personnel  (For farms, the regulation does not specify who makes the report.)	Not required.	MDARD Agriculture Pollution Emergency Hotline: 800-405-0101  For further information contact MDARD 517-284-5644
<b>Fire Prevention Code</b> 1941 PA 207 Section 29.5g	A fire, explosion, spill, leak, accident, or related occurrence that involves the transportation, storage, handling, sale, use, or processing of hazardous material by a firm, person, or vehicle.  <b>Hazardous</b> material = explosives, pyrotechnics, flammable gas, flammable compressed gas, flammable liquid, nonflammable compressed gas, combustible liquid, oxidizing material, poisonous gas or liquid, LPG, or irritating, etiologic, radioactive, or corrosive material.  Act 207 amended 6/19/2006. The State Fire Marshall is in LARA, Bureau of Fire Services.	Immediately following incident, report known details regarding incident: to LARA Bureau of Fire Services <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.	Not required.	Contact LARA Bureau of Fire Services by calling the MSP HazMat hotline: 800-525-5555  For further information: contact local fire department
<b>Fire Prevention Code</b> 1941 PA 207 Part 2 of Storage and Handling of Flammable and Combustible Liquids rules (FL/CL code)	A release from an <b>AST</b> system of > 55 gal of any <b>flammable or combustible liquid</b> (flash point < 200°F) to the ground or within a secondary containment area during any 24 hour period.  Note: Many liquid pesticides are combustible (flash point between 100 and 200°F).	As soon as practicable after detection of release: to PEAS by owner or operator.	Within 10 days after release: to LARA Bureau of Fire Services, Storage Tank Division outlining cause, discovery, response to prevent recurrence.	PEAS: 800-292-4706  For further information: contact LARA Bureau of Fire Services, Storage Tank Division 517-335-7211

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

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

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





## Release Notification Requirements in Michigan\*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 171 (Transportation of Hazardous Materials)	<p>Initial verbal notice: Incident during transportation (including loading, unloading, temporary storage) involving (1) <b>hazardous</b> material and resulting in death, injury requiring hospitalization, public evacuation <math>\geq</math> 1 hour, major transportation artery or facility closure <math>\geq</math> 1 hour, or flight pattern alteration; (2) fire, breakage, spillage, or suspected radioactive contamination occurs involving a <b>radioactive</b> material; (3) fire, breakage, spillage or suspected contamination involving an <b>infectious</b> substance other than a regulated medical waste; (4) <b>marine pollutant</b> 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 <math>\geq</math> 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 <a href="https://hazmatonline.phmsa.dot.gov/incident/">https://hazmatonline.phmsa.dot.gov/incident/</a></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 <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a></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 <a href="http://www.phmsa.dot.gov/hazmat">www.phmsa.dot.gov/hazmat</a></p>
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to <b>surface of ground, surface water, groundwater or public sewer system</b> )	<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 "<b>polluting material</b>" (<b>oil, salt</b>, 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 &amp; 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
CWA Section 311 33 CFR 153 ( <b>Navigable waters</b> – Coast Guard/DOT) Control of Pollution by <b>Oil</b> and <b>Hazardous</b> Substances, Discharge Removal	<p>Discharge of a harmful quantity of <b>oil</b> or a <b>hazardous</b> substance from a vessel or onshore or offshore facility into or upon navigable <b>waters</b> of the United States or adjoining <b>shorelines</b>.</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>	Not required.	<p>NRC 800-424-8802 or online at <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a></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>
CWA Section 311 40 CFR 110 ( <b>Discharge of Oil</b> )	<p>Discharges of <b>oil</b> that violate applicable <b>water</b> quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining <b>shorelines</b>, 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>	Not required.	<p>NRC 800-424-8802 or online at <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a></p> <p>For further information contact DEQ-WRD</p>
NREPA 1994 PA 451 Part 31, Water Resources Protection ( <b>Sewer Systems</b> )	<p>Discharge of untreated sewage or partially treated sewage from a <b>sewer system</b> 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 &amp; affected counties; &amp; 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>
NREPA 1994 PA 451 Part 41, <b>Sewerage Systems</b>	<p>Discharges of pollutants from <b>sewerage systems</b> (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
NREPA 1994 PA 451 Part 211, <b>Underground Storage Tanks</b> Part 213, Leaking Underground Storage Tanks	Releases of a <b>regulated substance</b> of any amount from underground storage tank (UST) systems (includes the emergency shutoff valve on down) subject to registration; overfill from UST fillpipe or vent onto ground; release from aboveground pipe attached to UST system.  Regulated substance = petroleum or CERCLA hazardous substance (40 CFR 302, Table 302.4) or substance listed in CAA title 1 part A sect 112. Petroleum includes, but is not limited to, crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents.	(Part 211) Within 24 hours after discovery: to LARA Bureau of Fire Services, Storage Tank Division by email, or fax on Form EQP 3826 (Rev. 4/12) If free product, Form EQP 3800 (Rev 02/2003) required by UST owner or operator, or employee of owner or operator.  Includes releases discovered years after UST system removed	(Part 213) At 180 days Initial Assessment Report on Form EQP3841 (Rev. 02/2003) if not closed; at 365 days Final Assessment Report on Form EQP3842 (Rev. 11/2006) if still not closed; at closure Closure Report on Form EQP3843 (Rev. 02/2003) to DEQ-RRD district project manager.	Email: <a href="mailto:deq-std-tanks@michigan.gov">deq-std-tanks@michigan.gov</a>  Fax: 517-335-2245  For further information contact DEQ-RRD or phone 800-MICHUST
NREPA 1994 PA 451 Part 111, <b>Hazardous Waste Management</b> (Generators; Treatment, Storage & Disposal Facilities (TSDF); Transporters)	Any amount of characteristic <b>hazardous waste</b> or listed hazardous waste (as defined in R 299.9203 "Hazardous Waste Rule 203") reaches the surface water or groundwater, or A fire, explosion, or other release of hazardous waste or hazardous waste constituent occurs that could threaten human health or the environment. or A release of >1lb (or ≤1lb if not immediately cleaned up) hazardous waste to the environment from a tank system or associated secondary containment system.  Additional hazardous waste reporting requirements under NREPA Part 201 and CERCLA.  NREPA Part 111 requires transporters to comply with 49 CFR 171 and 33 CFR 153.	Immediate: to PEAS (or for Tank systems/secondary containment, within 24 hours of discovery: to DEQ-OWMRP)  and to NRC if threat to human health or environment outside facility by generator, or owner or operator of TSDF, or transporter.	For large quantity generators and TSDF: Within 15 days after incident IF the contingency plan had to be implemented: to DEQ-OWMRP.  For tank/secondary containment systems: Within 30 days of discovery: to DEQ-OWMRP.  For transporters: to US DOT if required per 49 CFR 171.	PEAS: 800-292-4706  NRC 800-424-8802 or online at <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a>  For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 121, <b>Liquid Industrial Waste</b>	The <b>liquid industrial waste</b> spill could threaten public health, safety, welfare, or the environment, or has reached surface water or groundwater.  Liquid industrial waste includes nonhazardous brine, by-product, industrial wastewater, leachate, off-spec commercial chemical product, sludge, sanitary or storm sewer clean-out residue, grease trap clean-out residue, spill residue, used oil, or other liquid waste not regulated by other laws.	Immediate: to PEAS and local authorities by generator, transporter, or owner or operator of facility.  Refer to MCL 324.12111(1) for required report elements	Prepare within 30 days after incident. Submit upon request: to DEQ-OWMRP district supervisor.  Refer to MCL 324.12111(1) for required report elements	PEAS: 800-292-4706  For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 55, <b>Air Pollution Control</b>	Abnormal condition, start-up, shutdown, or malfunction that results in emissions exceeding permissible (in rule, permit or order) levels of <b>hazardous air pollutants</b> (HAPs) (CAA Sect. 112(b)) or <b>toxic air contaminants</b> (as specified in permit) for > 1 hour, or any air contaminant for > 2 hours.  Written follow-up report only required for emission exceedences lasting > 2 hours.	As soon as possible, but not later than 2 business days after discovery: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 10 days after start-up, shutdown, or abnormal condition, malfunction corrected. Or within 30 days of abnormal condition, malfunction discovery- whichever first: to DEQ-AQD district supervisor.	PEAS: 800-292-4706  For further information contact DEQ-AQD

## SECTION ONE: Environmental Regulations

### Release Notification Requirements in Michigan\*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 55, <b>Air Pollution Control</b> (Permit to Install Exemptions)	Emergency venting of <b>natural gas</b> from transmission and distributions systems or <b>field gas</b> 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, <b>Dry Cleaning</b>	Condition or incident presents a threat or hazard to <b>public health</b> 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 ( <b>oil and gas production fields</b> )	A loss, spill or release of (1) any amount of <b>brine, crude oil, or oil or gas field waste</b> <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 <b>natural gas</b> , or (3) <b>chemicals</b> 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 <b>Gas by Pipeline</b>	An incident, meaning: (1) Event that involves a release of <b>gas</b> from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility that results in: Death or hospitalization; or Property damage ≥ \$50,000; or estimated gas loss of ≥ three million cubic feet. (2) Event that results in emergency shutdown of LNG facility. (3) Significant event per operator.  Written Incident reports not required for LNG facilities.  Applies to pipeline systems and the transportation of gas through those systems in or affecting interstate or foreign commerce. (See 49 CFR 191.3 for details.)	Earliest practicable moment following discovery: to NRC by operator.  Notification must be electronic unless there is a safety-related condition to report.	As soon as practicable, and within 30 days after discovery: to US DOT. on DOT Form PHMSA F 7100.1 "Incident Report – Gas Distribution System." or PHMSA F 7100.2 "Incident Report – Gas Transmission and Gathering Systems" or PHMSA F 7100.3 "Incident Report – Liquefied Natural Gas (LNG) Facilities"  Supplemental report filed as necessary as soon as practicable.	NRC 800-424-8802 or online at <a href="http://www.nrc.uscg.mil">www.nrc.uscg.mil</a>  For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at <a href="http://ops.dot.gov">http://ops.dot.gov</a>

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

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

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



## Release Notification Requirements in Michigan\*

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

## SECTION ONE: Environmental Regulations

### Release Notification Requirements in Michigan\*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
TSCA 40 CFR 761.125 (PCBs)	Spills of <b>PCBs</b> 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 ( <b>Toxic chemical</b> release reporting)	Covered facilities as defined in 40 CFR 372 subpart B are subject to <b>toxic</b> 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.







## WOODHAVEN-BROWNSTOWN SCHOOL DISTRICT

*Learning and Leading for Tomorrow*

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**Administration Offices and Board of Education**

24821 Hall Road, Woodhaven, MI 48183

Phone 734.783.3300 • Fax 734.676.3262

mark.greathead@wbsdweb.com

Mark Greathead  
Superintendent

To: Erica Stevenson, Environmental Quality Analyst, EGLE

From: Mark Greathead, Superintendent

Subject: WBSD ILLICIT DISCHARGE ELIMINATION POLICY

Date: January 7, 2020

cc:

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The Woodhaven-Brownstown School District is in the process of adopting the WBSD ILLICIT DISCHARGE ELIMINATION POLICY, the regulatory mechanism that prohibits non-stormwater discharges, regulates the contribution of pollutants, prohibits illicit discharges, and requires enforcement of illicit discharges.

The current plan is to have this adopted at the January 28, 2020 meeting of the Board of Education.

## ILLICIT DISCHARGE ELIMINATION PROGRAM POLICY

Prevention of pollution from stormwater runoff and the protection of the quality of the waters of the State of Michigan are of utmost importance to Woodhaven-Brownstown School District. WBSD does not have regulatory authority to create or enforce ordinances. WBSD has developed a Board Policy Resolution to direct compliance and identify specific actions to be taken by WBSD to ensure compliance with applicable NPDES permit Standards.

Woodhaven-Brownstown School District has a board policy resolution to direct compliance with these requirements. The WBSD updated School Board Resolution will be reviewed and passed in 2020. A copy of the School Board Policy Resolution is provided in Attachment ###.

The WBSD Stormwater Manager or designee will be provided full access to all WBSD facilities and properties owned and operated by the district as required to inspect, investigate, and monitor suspected or confirmed illicit discharges or connections to the MS4.

Illicit Discharge means any discharge to, or seepage into the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater except discharges pursuant to an NPDES permit. Illicit discharges include but are not limited to the following:

- Dumping of motor vehicle fluids
- Improper disposal of household hazardous wastes
- Grass clippings
- Leaf litter
- Pet & other animal wastes
- Unauthorized discharges of sewage
- Industrial wastes
- Restaurant wastes
- Vehicle & equipment wash waters
- Any non-stormwater waste

Document all activities utilizing the Illicit Discharge Elimination Program Pollution Complaint Tracking Reporting Form.

Illicit Connection means a physical connection to the MS4 separate stormwater system that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4 separate storm sewer system; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

Woodhaven-Brownstown School District (WBSD) policy is to eliminate all illicit connections or discharges from their facilities and restrict the discharge of polluting substances to the separate storm sewer system. The process to achieve these goals will consist of the inspection and screening of all storm sewer systems and elimination of any improper connection from any WBSD facility to any waterway or the municipally owned separate storm sewer system (MS4).



## Discharge Prohibitions

1. Prohibition of Illicit Discharges. WBSD prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.
2. The following discharge is not prohibited.
  - a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the WBSD MS4. Discharge or flows from firefighting activities will be addressed only if they are identified as significant sources of pollutants to surface waters of the state.
  - b. The following activities are not prohibited under this policy unless they are determined to be significant sources of pollutants to surface waters of the state:
    - Water line flushing and discharges from potable water sources.
    - Landscape irrigation runoff, lawn water runoff, and irrigation waters.
    - Diverted stream flows and flows from riparian habitats and wetlands.
    - Rising groundwater and springs.
    - Uncontaminated groundwater infiltration and seepage.
    - Uncontaminated pumped groundwater, except groundwater cleanups specifically authorized by NPDES permits.
    - Foundation drains, water from crawl space sumps, footing drains, and basement sump pumps.
    - Air conditioning condensation.
    - De-chlorinated swimming pool water from single, two, or three family residences.  
(swimming pools operated by WBSD shall not be discharges to the separate storm sewer system or a surface water of the state without NPDES permit authorization).

## Prohibition of Illicit Connections

1. Improper connections in violation of this regulatory mechanism must be disconnected and redirected.
2. Illicit discharge and connections will be eliminated.
3. The construction, use, maintenance or continued existence of illicit connections to the storm drain system is prohibited by WBSD. 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.

# Appendix F

# STANDARD OPERATING PROCEDURE CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



APRIL 2017  
V2

## SECTION A – PURPOSE

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a **description of current and proposed BMPs** to meet the minimum control measure requirements for the construction stormwater runoff control program to the maximum extent practicable. **The Woodhaven-Brownstown School District does not administer a Part 91 program and is not a designated enforcement agency.** The following standard operating procedure provides a description of the procedures the District employs for construction site runoff control that includes notification procedures and ensuring proper permits are obtained when disturbing greater than one acre of soil or construction activity located within 500 feet of the water's edge of a lake or stream.

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

## SECTION B – NOTIFICATION PROCEDURE

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

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

## SECTION C – MEASUREABLE GOALS

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

- Number of Part 91 permits issued to the District.

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

## **SECTION D – REPORTABLE DISCHARGES**

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

## **SECTION E –STATE OF MICHIGAN PERMIT BY RULE**

The District will follow the State of Michigan Permit by Rule (Rule 323.2190) for storm water discharge from construction activity if the area of the disturbance is greater than 5 acres.

## **SECTION F – PROCESS FOR REVISION**

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

# Appendix G

# STANDARD OPERATING PROCEDURE POST CONSTRUCTION STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



APRIL 2017

## **SECTION A – PURPOSE**

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

## **SECTION B – ADOPTION OF COUNTY STANDARDS**

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

## **SECTION C – MEASURABLE GOALS**

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

- Number of projects completed requiring post-construction stormwater runoff control

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

## **SECTION D – PROCESS FOR REVISION**

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



**WOODHAVEN-BROWNSTOWN SCHOOL  
DISTRICT WAYNE COUNTY, MICHIGAN**

At a Regular Meeting of the Woodhaven-Brownstown School District Board of Education held on Tuesday, February 8, 2022, the following resolution was adopted:

**RESOLUTION**

**STORM WATER MANAGEMENT ORDINANCE  
FOR POST-CONSTRUCTION CONTROLS**

WHEREAS, the Michigan Department of Environmental Quality Phase II Storm Water Regulations Storm Water Permit MI0060064v1.0, requires a regulatory storm water management mechanism for post construction to minimize flooding, stream bank erosion, and loss of or damage to natural resources within the district;

WHEREAS, certain local units of government within Wayne County that own and/or operate small separate storm sewers also are required by federal law to establish storm water management programs. Ideally, to achieve maximum flood control and water resources benefits with the least burden and cost to contractors and property owners, storm water controls to be enacted by the local units of government should be coordinated with the Wayne County program and with other programs within Wayne County.

WHEREAS, one compliance option for local units of government required to implement storm water management programs may be to adopt the Wayne County Storm Water Management Standards by reference. Newly enacted or amended ordinances generally must be published in at least one local newspaper before they become effective and have the force of law.

WHEREAS, The Woodhaven Brownstown School District has agreed to officially adopt the new Wayne County Storm Water Management Standards Adopted by Wayne County September 2021 as the District's official regulatory mechanism for post-construction controls, which will replace the previous Wayne County Ordinance (Enrolled Ordinance No. 2006-1114A), and Administrative Rules (Resolution No. 2006-1114B) for which the District Architects have been previously following for new development and redevelopment projects.

NOW THEREFORE BE IT RESOLVED, that the Woodhaven-Brownstown School District has agreed to adopt the Wayne County Storm Water Management Standards Adopted by Wayne County September 2021 as the District's official regulatory mechanism for post-construction controls for all District development and redevelopment construction projects that disturb one (1) or more acres, including projects less than one (1) acre that are a part of a larger plan when combined disturb in total one (1) acre of land or more and will require architects/engineers contracted by the District to incorporate post construction controls into the design pursuant to the Wayne County Storm Water Management Standards. The District also agrees to perform long-term operation and maintenance of all structural and vegetative best management (BMPs) implemented on all District properties to meet storm water performance standards.

BE IT FURTHER RESOLVED, that the approval be and is hereby granted, requiring architects/ engineers contracted by the Woodhaven Brownstown School District to follow the Wayne County Storm Water Management Standards Adopted by Wayne County September 2021 for new development and redevelopment design for storm water management systems designed on or after December 1, 2021 for the Woodhaven-Brownstown School District.

The following preamble and resolution were offered by Member Harris and supported by Member Berry.

YEAS: Padgett, Pimer, Berry, Burke, Harris, Bauer-Perry

NAYS: none

ABSTAIN: none

ABSENT: Bertin-Kelsay

APPROVED AND ADOPTED by the Woodhaven-Brownstown School District Board of Education on this the 8<sup>th</sup> day of February, 2022.

Motion unanimously carried.

  
\_\_\_\_\_  
Cara Pimer, Board Secretary

# Appendix H

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

## GENERAL PROCEDURES

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



APRIL 2017

V2

## 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

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

## SECTION D – DISTRICT INVENTORY AND ASSESSMENT

The following table identifies the District’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 District that has stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state. In addition to the attached Structural Control Inventory providing geographic location, up-to-date maps showing the location of the facilities and structural storm water controls is available at Support Services Building.

**Table 1: District Owned and Operated Properties with Stormwater Controls**

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
Support Services Facility 24793 Van Horn Rd Brownstown MI 48134	Dumpsters Aboveground Storage Tank (2) Oil Water Separator (1) Stockpiles (2) Also see Appendix H: Storm Water Controls Inventory	High	1	Catch basin cleaning Part 5 Rules / Secondary Containment
Erving Elementary 24175 Hall Rd Woodhaven MI 48183	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Gudith Elementary 22700 Sibley Rd Brownstown MI 48193	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Yake Elementary 16400 Carter Rd Woodhaven MI 48183	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Wegienka Elementary 23925 Arsenal Rd Brownstown MI 48134	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Bates Elementary 22811 Gudith Rd Woodhaven MI 48183	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Woodhaven High School 24787 Van Horn Rd Brownstown MI 48134	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Brownstown Middle School 20135 Inkster Rd Brownstown MI 48174	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule
Patrick Henry Middle School/Administration Building 24825 Hall Rd Woodhaven MI 48183	Dumpsters Appendix H: Storm Water Controls Inventory	Low	1	Catch basin Inspection and cleaning & Storm Sewer System Inspection & Maintenance Schedule

In addition to the properties in Table 1, see Appendix H District Inventory.

## 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. The District assessed the Support Services Buildings a high potential for pollutant runoff. Bus washing is completed inside the Support Services Building at the indoor bus/ vehicle washing station, all equipment repairs are conducted inside the building where all floor drains connect to sanitary sewer system with oil water separator, etc. See Attached Fueling SOP for District Fueling operations.

### E.1 Inventory and Description of Materials and Activities

The District Bus Fleet Maintenance operations are conducted at their Support Services Facility at 24793 Van Horn Rd. This is the site considered high priority due to the following operations:

#### **Support Services Facility – 24793 Van Horn Rd**

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

## SECTION F –CATCH BASIN MAINTENANCE

All of the District's catch basins have very little sediment accumulation rates and require little maintenance. Catch basins that are subject to isolated instances where structures are plugged or damaged are identified during GCA Services (Contract Employees of the District) scheduled maintenance Inspections, on a quarterly basis. Sediment control structures are also inspected for sediment levels and cleaned per manufactures recommendations. The District contracts out all catch basin and sediment control structure cleaning to a licensed industrial maintenance contractor.

## SECTION G – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING

Catch basins are visually inspected quarterly or if a complaint is registered. 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 GCA staff. Structure repairs are prioritized based on public safety concerns. The District contracts out all catch basin and sediment control structure cleaning to licensed industrial maintenance contractors which utilize vacuor trucks 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. Material collected from licensed industrial maintenance contractor catch basin & sediment control structure cleaning activities becomes property of the licensed contractor and is transported and disposed of by the contractor. Catch basins that are located on non-District property are not inspected, cleaned, or maintained by the District.

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

- Number of catch basins repaired/cleaned with a goal of 100% of catch basins inspected over the reporting period

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

## **SECTION H – DISPOSAL OF COLLECTED MATERIAL**

Material collected from licensed industrial maintenance contractor catch basin & sediment control structure cleaning and parking lot sweeping activities becomes property of the licensed contractor and is transported and disposed of by the contractor.

## **SECTION I –PARKING LOT SWEEPING**

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

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

- Summary of frequency of sweeping, number of lots swept with a goal of 100% District Parking Lots swept at a minimum of once over the reporting period

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

## **SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS**

In addition to implementing the catch basin/ sediment control structure, inspection, maintenance, and paved parking lot sweeping programs, the District also maintains a Forebay Detention Pond at the Woodhaven High School Facility; Green Roofs at Brownstown Middle School, District Administration Building, Erving Elementary School; and Grow Zones at Gudith and Yake Elementary Schools. Also see inventory list identifying installed underground detention systems installed on all District properties to improve water quality exiting the sites. All controls are inspected and maintained per the maintenance schedule.

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

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

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



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

### **Detention Basins**

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

### **Oil/Water Separators**

Oil/Water Separators are visually during biweekly housekeeping inspections. Oils are removed at a minimum annually or when level of oil reaches 4 inches below invert of effluent pipe in structure. Cleaning is performed by the District's used oil removal contractor while collecting used oil for re-refining.

### **Secondary Containment**

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

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

## **SECTION K – NEW APPLICANT OWNED FACILITIES**

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

## **SECTION L – CERTIFIED PESTICIDE APPLICATOR**

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

## **SECTION M – EMPLOYEE TRAINING**

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The District

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 District includes:

Employees Trained	Training Description and Frequency
New Support Services/ Contracted Services (1 <sup>st</sup> Student & GCA Services) Employees	Upon hire, employees will: <ul style="list-style-type: none"> <li>• View the Municipal Storm Water Pollution Prevention Storm Watch training video.</li> <li>• Read and become familiar with the District’s SOPs.</li> </ul>
All Support Services / Contracted Services- Field Employees (GCA)	Annually, employees will: <ul style="list-style-type: none"> <li>• View the Municipal Stormwater Pollution Prevention Storm Watch training video.</li> <li>• Review proper materials storage and handling.</li> <li>• Review good housekeeping and pollution prevention practices.</li> <li>• Review examples of illicit discharges to the storm sewer system</li> <li>• Review District Spill Response Procedures</li> </ul>
Key staff	Once per permit cycle: <ul style="list-style-type: none"> <li>• Attendance of key staff to relevant training workshops by the Alliance of Downriver Watersheds, Wayne County, SEMCOG, MDEQ, or others, when available.</li> </ul>

*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 District’s Certificate of Coverage.

## SECTION N –CONTRACT REQUIREMENTS AND OVERSIGHT

The contractors hired by the District to perform municipal operations that potentially impact stormwater are required to follow appropriate pollution prevention BMPs indicated in the District’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 District staff through daily observation to ensure quality of work, adherence to the specified contract language, and to ensure that potential impacts to stormwater are minimized.

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

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

These metrics will be tracked over the reporting cycle that is specified in the District'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.

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
ERVING ELEMENTARY**

Storm Sewer Structures		
Size	Type	Quantity
2FT DIA	INLET	3
4FT DIA	CATCH BASIN	4
4FT DIA	MANHOLE	1
8FT DIA	CONTROL STRUCTURE	1
6FT DIA	BYPASS MANHOLE	1
24 INCH	DETENTION ACCESS RISER	3
	STORMCEPTER MODEL # 7200	1
	STORMCEPTER MODEL # 450i	1
TOTAL		15

Underground Detention
48" Diameter Pipe: 14 Runs @ 125' Each Total Length of Underground Pipe Storage= 1,839 LF

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
GUDITH ELEMENTARY**

Storm Sewer		
Size	Type	Quantity
4FT DIA	CATCH BASIN	13
5FT DIA	CATCH BASIN	1
4FT DIA	MANHOLE	1
5FT DIA	MANHOLE	1
8FT DIA	CONTROL STRUCTURE	1
24 INCH	DETENTION ACCESS RISER	4
	STORMCEPTER MODEL # 6000	1
TOTAL		22

Underground Detention
48" Diameter Pipe: 12 Runs @ 210' Each Total Length of Underground Pipe Storage= 2,520 LF

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
YAKE ELEMENTARY**

Storm Sewer		
Size	Type	Quantity
4FT DIA	CATCH BASIN	7
4FT DIA	MANHOLE	5
4FT DIA	WEIR RESTRICTED MANHOLE B	1
24 INCH	DETENTION ACCESS RISER	4
	STORMCEPTER MODEL # 6000	1
TOTAL		13

Underground Detention
60" Diameter Pipe: 10 Runs @ 150' Each Total Length of Underground Pipe Storage= 1,500 LF

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
WEGIENKA ELEMENTARY**

Storm Sewer		
Size	Type	Quantity
4FT DIA	CATCH BASIN	13
4FT DIA	MANHOLE	1
8FT DIA	MANHOLE	1
24 INCH	DETENTION ACCESS RISER	4
	STORMCEPTER MODEL # 4800	1
TOTAL		20

Underground Detention
48" Diameter Pipe: 5 Runs @ 110' Each Total Length of Underground Pipe Storage= 550 LF

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
BATES ELEMENTARY**

Storm Sewer		
Size	Type	Quantity
2FT DIA	INLET	2
4FT DIA	CATCH BASIN	9
4FT DIA	MANHOLE	3
8FT DIA	MH OVERFLOW STRUCTURE	1
24 INCH	DETENTION ACCESS RISER	2
	STORMCEPTER MODEL # 7200	1
	STORMCEPTER MODEL # 450i	1
TOTAL		16

Underground Detention
48" Diameter Pipe: 16 Runs @ 115' Each
Total Length of Underground Pipe Storage= 1942 LF

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
SUPPORT SERVICES**

Storm Sewer Structures		
Size	Type	Quantity
4FT DIA	CATCH BASIN	7
	OUTDOOR PAVEMENT DRAIN	1
TOTAL		8

Other Controls Installed
Bus Wash Reclamation System (Indoor)
Oil Water Separator / Sanitary Sewer System

\* NOTE: Support Services Site drainage is connected to and part of the Woodhaven High School storm water sewer system.

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & STORM SYSTEM STORAGE INVENTORY  
WOODHAVEN HIGH SCHOOL**

Storm Sewer Structures		
Size	Type	Quantity
4FT DIA	CATCH BASIN	46
5FT DIA	MANHOLE	8
6FT DIA	MANHOLE	5
8FT DIA	MANHOLE	1
9FT DIA	MANHOLE	1
3FT DIA	CMP RISER 1" DIA HOLES @ 4" OC w/ 15" DIA OUTLET	2
TOTAL		<u>63</u>

Underground Detention
FOREBAY -DETENTION BASIN
TOTAL STORAGE VOLUME=371,022 FT^3

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
BROWNSTOWN MIDDLE SCHOOL**

Storm Sewer Structures		
Size	Type	Quantity
4FT DIA	CATCH BASIN	5
	STORMTECH - SC-740 Chamber System	3
TOTAL		<u>8</u>

Underground Detention
Stormtech SC-740 Chambers: 3 Locations 9 chambers+16 chambers+8 chambers= 33 Total chambers

**WOODHAVEN BROWNSTOWN SCHOOL DISTRICT  
STORM STRUCTURE & UNDERGROUND STORAGE INVENTORY  
PATRICK HENRY MIDDLE SCHOOL & ADMINISTRATION BUILDING**

Storm Sewer Structures		
Size	Type	Quantity
4FT DIA	CATCH BASIN	5
5FT DIA	MANHOLE	5
30IN DIA	ACCESS RISER	1
8FT DIA	OUTLET CONTROL	1
	STORMCEPOR 1800	1
TOTAL		<u>13</u>

Underground Detention
42" Diameter Pipe: 4 Runs @ 60' Each Total Length of Underground Pipe Storage= 259 LF



# STANDARD OPERATING PROCEDURE

## POLLUTION PREVENTION AND GOOD HOUSEKEEPING

### SPILL RESPONSE

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



APRIL 2017

V2

## SECTION A – PERSONNEL

The following School District personnel have been identified as key staff in charge of spill response planning, implementation and maintenance of the Spill Response Plan.

Name	Phone
Mark Greathead– District Superintendent	(734) 778-1435
Michael Belcher – Director of Contracted Services	(734) 891-7337

### A.1 Responsibilities

- The **Facility Responsible Person** has primary responsibility for coordinating the response to emergencies, including chemical spills
- **Supervisors** should ensure that employees are familiar with these procedures and receive the necessary training
- **All employees** should follow these procedures in the event of a chemical spill

### A.2 Emergency Contact Numbers

The following telephone numbers should be posted near telephones and in other conspicuous locations:

Name	Affiliation	Phone
Mike Clark– Woodhaven Fire Chief	Woodhaven Fire Department	(734) 675-4918
Jeff Drouillard- Brownstown Fire Chief	Brownstown Fire Department	(734) 675-1300
Mark Greathead– District Superintendent	Woodhaven-Brownstown School District	(734) 676-0935
Michael Belcher – Director of Contracted Services	Woodhaven-Brownstown School District	(734) 891-7337
MDEQ 24-Hour Pollution Emergency Alerting System (PEAS)		1-800-292-4706
MDEQ Southeast Michigan District Office		(586) 753-3794
National Response Center		1-800-424-8802
Inland Waters Pollution Control	Environmental Contractor	(734) 841-5800
Marine Pollution Control	Environmental Contractor	1-800-521-8232

## SECTION B – CLEAN-UP PROCEDURES

Spilled chemical should be effectively and quickly contained and cleaned up. Employees should clean up spills themselves **only if properly trained and protected**. Employees who are not trained in spill cleanup procedures should report the spill to the Responsible Person(s) listed above, warn other employees, and leave the area.

The following general guidelines should be followed for evacuation, spill control, notification of proper authorities, and general emergency procedures in the event of a chemical incident in which there is potential for a significant release of hazardous materials.

### B.1 Evacuation

Persons in the immediate vicinity of a spill should *immediately evacuate* the premises (except for employees with training in spill response in circumstances described below). If the spill is of “medium” or “large” size, or if the spill seems hazardous, immediately notify emergency response personnel.

### B.2 Spill Control Techniques

Once a spill has occurred, the employee needs to decide whether the spill is small enough to handle without outside assistance. Only employees with training in spill response should attempt to contain or clean up a spill.

NOTE: If you are cleaning up a spill yourself, make sure you are aware of the hazards associated with the materials spilled, have adequate ventilation, and proper personal protective equipment. Treat all residual chemical and cleanup materials as hazardous waste.

Spill control equipment should be located wherever significant quantities of hazardous materials are received or stored. Material Safety Data Sheets (SDSs), absorbents, over-pack containers, container patch kits, spill dams, shovels, floor dry, acid/base neutralizers, and “caution-keep out” signs are common spill response items.

### B.3 Spill Response and Clean-up

Chemical spills are divided into three categories: Small, Medium, and Large. Response and cleanup procedures vary depending on the size of the spill.

**Small Spills:** Any spill where the major dimension is less than 18 inches in diameter. Small spills are generally handled by internal personnel and usually do not require an emergency response by police or fire department HAZMAT teams.

- Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder.
- Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and (nearby electrical

equipment). If serious hazards are present leave the area and call 911. When in doubt consult the SDS for hazards.

- Stop source of spill (plug hole, up-right the container, shut off valve).
- Notify Spill Response Coordinator.
- Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
- If spilled material has entered a storm sewer, check catch basins and attempt to isolate contaminated material. Also, contact **Michael Belcher, Director of Contracted Services, at (734) 891-7337** with a location and description of the spill.
- Clean up spilled material/absorbent (do not flush with water).
- Dispose of cleaned material/absorbent into secure container for proper disposal as required by state and federal law.
- Ensure entire spill area is properly cleaned and all hazards have been removed.
- Complete a Spill Reporting Sheet.

**Medium Spills:** Spills where the major dimension exceeds 18 inches, but is less than 6 feet. Outside emergency response personnel (police and fire department HAZMAT teams) may be called for medium spills. Common sense, however, will dictate when it is necessary to call them.

- Immediately try to help contain the spill at its source by simple measures only. This means quickly up-righting a container, or putting a lid on a container, if possible. Do not use absorbents unless they are immediately available. Once you have made a quick attempt to contain the spill, or once you have quickly determined you cannot take any brief containment measures, leave the area and alert Emergency Responders at 911. Closing doors behind you while leaving helps contain fumes from spills. Give police accurate information as to the location, chemical, and estimated amount of the spill.
- Evaluate the area outside the spill. Engines and electrical equipment near the spill area must be turned off. This eliminates various sources of ignition in the area. Advise Emergency Responders on how to turn off engines or electrical sources. Do not go back into the spill area once you have left. Help emergency responders by trying to determine how to shut off heating, air conditioning equipment, or air circulating equipment, if necessary.
- If emergency responders evacuate the spill area, follow their instructions in leaving the area.
- After emergency responders have contained the spill, be prepared to assist them with any other information that may be necessary, such as SDSs and questions about the facility. Emergency responders or trained personnel with proper personal protective equipment will then clean up the spill residue. Do not re-enter the area until the responder in charge gives the all clear. Be

prepared to assist these persons from outside the spill area with SDSs, absorbents, and containers.

- Reports must be filed with proper authorities. It is the responsibility of the spiller to inform both his/her supervisor and the emergency responders as to what caused the spill. The response for large spills is similar to the procedures for medium spills, except that the exposure danger is greater.

**Large Spills:** Any spill involving flammable liquid where the major dimension exceeds 6 feet in diameter; and any “running” spill, where the source of the spill has not been contained or flow has not been stopped.

- Leave the area and notify Emergency Responders (911). Give the operator the spill location, chemical spilled, and approximate amount.
- From a safe area, attempt to get SDS information for the spilled chemical for the emergency responders to use. Also, be prepared to advise responders as to any ignition sources, engines, electrical power, or air conditioning/ventilation systems that may need to be shut off. Advise responders of any absorbents, containers, or spill control equipment that may be available. This may need to be done from a remote area, because an evacuation that would place the spiller far from the scene may be needed. Use radio or phone to assist from a distance, if necessary.
- Only emergency response personnel, in accordance with their own established procedures, should handle spills greater than 6 feet in any dimension or that are continuous. Remember, once the emergency responders or HAZMAT team is on the job cleaning up spills or putting out fires, the area is under their control and no one may re-enter the area until the responder in charge gives the all clear.
- Provide information for reports to supervisors and responders, just as in medium spills.

## **SECTION C – REPORTING SPILLS**

All chemical spills, regardless of size, should be reported as soon as possible to the Facility Responsible Person. The Responsible Person will determine whether the spill has the potential to affect the environment outside of the facility and must be reported to local, state, or federal agencies. Examples of spills that could affect the outside environment include spills that are accompanied by fire or explosion and spills that could reach nearby water bodies.

### **C.1 Reporting Thresholds**

The spill coordinator will report spills to MDEQ PEAS for spills that involve the following:

- Salt spills over 50 pounds or 50 gallons of brine onto the ground or into water (required by Part 5 rules)

- Gasoline release of 32 gallons or more onto the ground (required by Part 201)
- Oil release of 50 pounds (approximately 7½ gallons) onto the ground (required by Part 5 rules)
- Any amount of oil or fuel that reaches surface water or shorelines, call MDEQ PEAS and the National Response Center (as required by the Clean Water Act and Part 31)
- Any spill that is in doubt about reporting

## **C.2 Reporting Requirements**

PEAS hotline is called immediately after becoming aware of a reportable discharge event, followed by submission of a written report within ten (10) days of release, for the reportable releases to the following:

- MDEQ Water Resources Division Field Operations Chief, PO Box 30273, Lansing, Michigan 48909-7773
- Wayne County Department of Public Health, 33030 Van Born Road, Wayne, Michigan 48184

Note: the optional report form EPQ 3465 can be found at:

[http://www.michigan.gov/deg/0,4561,7-135-3307\\_29894\\_5959-20341--,00.html](http://www.michigan.gov/deg/0,4561,7-135-3307_29894_5959-20341--,00.html)

The MDEQ may request other follow-up reports depending on the situation.

## **SECTION D – SPILL KIT INVENTORY**

The following is a list of spill response equipment that will be maintained by the designated spill response coordinators at all locations where fuel products are stored and dispensed.

### **D.1 Minimum Spill Response Equipment**

- 20 pounds of floor dry
- 1 shovel
- 1 broom
- Caution tape
- 1 Absorbent boom
- Absorbent Socks
- Container for clean-up (30 gallons)
- Sample bottles

## **SECTION E – PROCESS FOR REVISION**

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

# **Storm Water Pollution Prevention Plan (SWPPP)**

**SWPPP  
Transportation/  
Support Services**

November 2021

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Attachment B	NPDES Storm Water Permit MI0060064
Attachment C	Record of SWPPP Changes
Attachment D	Employee Training, Education Program Outline, & Trainee Signature Sheet
Attachment E	Plan Certifications
Attachment F	Incident/Spill Report Form
Attachment G	Record of Reportable Spills & Leaks
Attachment H	Facility Comprehensive Inspection & Inspection Forms

## Acronyms

ASTs	Aboveground Storage Tanks
BMPs	Best Management Practices
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EPA	Environmental Protection Agency
LEPC	Local Emergency Planning Committee
MSGP	Michigan Storm Water Multi-Sector General Permit for Industrial Activities
MiWaters	Michigan Online Reporting and Submittals Database
MS4	Municipal Separate Storm Sewer System
NEC	No Exposure Certification
NOT	Notice of Termination
NRC	National Response Center
NREPA	Natural Resources and Environmental Protection Act
PIPP	Pollution and Incident Prevention Plan
PPT	Pollution Prevention Team
PRD	Permit Registration Documents
RQ	Reportable Quantity
SERC	State Emergency Response Commission
SIC	Standard Industrial Classification
SPCC	Spill Prevention, Control, and Countermeasure
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Load

## Summary of Requirements

Frequency	Requirement	Compliance Date	Section	Form	File In
Once	Sign the SWPPP Certification of Accuracy	Upon SWPPP implementation	2.12	Attachment E	Attachment E
	Record Reportable Spills/Leaks	Prior to MIS410000 Permit Issuance	7.4	Attachment G	Attachment G
	Submit Permit Application for Renewal	Completed 2019	1.2	Attachment A	Attachment A
	Receive Permit	NPDES Permit no. MI0060064 Issued July 30, 2021	1.2	Attachment B	Attachment B
	Notice of Termination (NOT)	Once discharges cease under the Permit	2.5	N/A	N/A
Quarterly	Management to obtain Industrial Storm Water Operator Certification	Upon change of Certified Personnel	3.1	N/A	Compliance Binder
	Comprehensive Site Inspection	Once per calendar quarter: Jan-March; Apr-June; July-Sept; Oct-Dec	8.3	Attachment H	Compliance Binder
	Visual examination of storm water quality	Twice per calendar quarter during a storm event: Jan -June; July -Dec <i>Required within 30 days of Comprehensive Site Inspection</i>	8.4	Attachment H	Compliance Binder
	Review and modify SWPPP document accordingly	On or before January 10 <sup>th</sup> of each year or whenever there is a change to the specifics of the site	9.1	Attachment C	Attachment C
	Biennial Progress Report to EGLE	Submit Progress Report to MDEQ before April 1 <sup>st</sup> every two years	9.1	MIWaters Online Database	Compliance Binder
Annually or Biennial	Annual Permit Renewal Fee	January, no later than 45 days after receipt of invoice from EGLE	2.8	N/A	N/A
	Employee Training	Annually, every calendar year	2.10	Attachment D	Compliance Binder
	Changes to Facility Management	Written notification required to EGLE within 10 days	2.4	N/A	Compliance Binder
	SWPPP revisions identified by MDEQ	Within 30 calendar days of notification	1.3	Attachment C	Attachment C
	Update Record of Reportable Spills and Leaks and revise SWPPP	Within 14 calendar days of spill event	7.4	Attachment G	Attachment G
As Necessary	Retain all Inspection Forms, Notices, and SWPPP	Minimum of 3 Years	2.11	File In Compliance Binder	
	File a request for continued authorization to discharge under the Permit (i.e. Permit Renewal)	On or before October 1, 2024	2.7	MIWaters Online Database	Attachment A
	Notification of changes to on-site Industrial Storm Water Certified Operator	None specified	3.2	MIWaters Online Database	N/A
Every 5 Years	Industrial Storm Water Operator Recertification	Before August 31 of the year of expiration	3.1	N/A	N/A

Woodhaven-Brownstown PS Permit No. MI0060064 - expires October 1, 2024

**Conduct tasks under each section to which your spill applies.**

(Example: A first-time 50-gallon spill [not to navigable waters] requires that all tasks under parts A and C be completed.)

**Site personnel shall perform the following:**☐ **A. Any Spill:**

- > Contain and isolate spill.
- > Fix the spill source.
- > Properly remove any spilled or contaminated substances as hazardous waste.

**The Environmental Compliance Manager (Michael Belcher) will perform the following:**☐ **B. Any spill to navigable waters:**

- > Immediately notify the National Response Center (NRC) at (800) 424-8802.
- > Contact the Michigan Pollution Emergency Alerting System (PEAS) at (800) 292-4706 (calls from out-of-state dial 1(517)373-7660).

☐ **C. Any spill of 42 gallons or more not contained and not cleaned up:**

- > Contact Michigan Pollution Emergency Alerting System (PEAS) at (800) 292-4706 (calls from out-of-state dial 1 (517) 373-7660).
- > As soon as practicable, submit a written follow-up report to the Local Emergency Planning Committee (LEPC) and State Emergency Response Commission (SERC) Spill report form here:
  - [http://www.michigan.gov/documents/deq/deq-oea-sara-eqp3465e\\_370548\\_7.pdf](http://www.michigan.gov/documents/deq/deq-oea-sara-eqp3465e_370548_7.pdf)

☐ **D. Any spill of 1,000 gallons or more or any second or subsequent spill of 42 gallons or more within a 12-month period:**

- > Contact Michigan Pollution Emergency Alerting System (PEAS) at (800) 292-4706 (calls from out-of-state dial 1 (517) 373-7660).
- > Contact National Response Center (NRC) at (800) 424-8802.
- > Submit a written notice to the EPA Regional Administrator.
- > U.S. EPA Region 5 at (312) 353-2000.

For more information, see Section 7 of this report.



# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

## SPILL RESPONSE

PREPARED FOR:

THE Woodhaven-Brownstown School District  
24821 Hall ROAD, Woodhaven, MICHIGAN 48183



November 2021

## SECTION A – PERSONNEL

The following School District personnel have been identified as key staff in charge of spill response planning, implementation and maintenance of the Spill Response Plan.

Name	Phone
Mark Greathead– District Superintendent	(734) 789-2357
Michael Belcher – Director of Contracted Services	(734) 891-7337

### A.1 Responsibilities

- The **Facility Responsible Person** has primary responsibility for coordinating the response to emergencies, including chemical spills
- **Supervisors** should ensure that employees are familiar with these procedures and receive the necessary training
- **All employees** should follow these procedures in the event of a chemical spill

### A.2 Emergency Contact Numbers

The following telephone numbers should be posted near telephones and in other conspicuous locations:

Name	Affiliation	Phone
Brad Myles– Woodhaven Fire Chief	Woodhaven Fire Department	(734) 675-4918
Jeff Drouillard- Brownstown Fire Chief	Brownstown Fire Department	(734) 675-1300
Mark Greathead– District Superintendent	Woodhaven-Brownstown School District	(734) 789-2357
Michael Belcher – Director of Contracted Services	Woodhaven-Brownstown School District	(734) 891-7337
EGLE 24-Hour Pollution Emergency Alerting System (PEAS)		1-800-292-4706
EGLE Southeast Michigan District Office		(586) 753-3794
National Response Center		1-800-424-8802
Inland Waters Pollution Control	Environmental Contractor	(734) 841-5800
Marine Pollution Control	Environmental Contractor	1-800-521-8232

## SECTION B – CLEAN-UP PROCEDURES

Spilled chemical should be effectively and quickly contained and cleaned up. Employees should clean up spills themselves ***only if properly trained and protected***. Employees who are not trained in spill cleanup procedures should report the spill to the Responsible Person(s) listed above, warn other employees, and leave the area.

The following general guidelines should be followed for evacuation, spill control, notification of proper authorities, and general emergency procedures in the event of a chemical incident in which there is potential for a significant release of hazardous materials.

### B.1 Evacuation

Persons in the immediate vicinity of a spill should *immediately evacuate* the premises (except for employees with training in spill response in circumstances described below). If the spill is of “medium” or “large” size, or if the spill seems hazardous, immediately notify emergency response personnel.

### B.2 Spill Control Techniques

Once a spill has occurred, the employee needs to decide whether the spill is small enough to handle without outside assistance. Only employees with training in spill response should attempt to contain or clean up a spill.

NOTE: If you are cleaning up a spill yourself, make sure you are aware of the hazards associated with the materials spilled, have adequate ventilation, and proper personal protective equipment. Treat all residual chemical and cleanup materials as hazardous waste.

Spill control equipment should be located wherever significant quantities of hazardous materials are received or stored. Material Safety Data Sheets (SDSs), absorbents, over-pack containers, container patch kits, spill dams, shovels, floor dry, acid/base neutralizers, and “caution-keep out” signs are common spill response items.

### B.3 Spill Response and Clean-up

Chemical spills are divided into three categories: Small, Medium, and Large. Response and cleanup procedures vary depending on the size of the spill.

**Small Spills:** Any spill where the major dimension is less than 18 inches in diameter. Small spills are generally handled by internal personnel and usually do not require an emergency response by police or fire department HAZMAT teams.

- Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder.
- Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and (nearby electrical

prepared to assist these persons from outside the spill area with SDSs, absorbents, and containers.

- Reports must be filed with proper authorities. It is the responsibility of the spiller to inform both his/her supervisor and the emergency responders as to what caused the spill. The response for large spills is similar to the procedures for medium spills, except that the exposure danger is greater.

**Large Spills:** Any spill involving flammable liquid where the major dimension exceeds 6 feet in diameter; and any “running” spill, where the source of the spill has not been contained or flow has not been stopped.

- Leave the area and notify Emergency Responders (911). Give the operator the spill location, chemical spilled, and approximate amount.
- From a safe area, attempt to get SDS information for the spilled chemical for the emergency responders to use. Also, be prepared to advise responders as to any ignition sources, engines, electrical power, or air conditioning/ventilation systems that may need to be shut off. Advise responders of any absorbents, containers, or spill control equipment that may be available. This may need to be done from a remote area, because an evacuation that would place the spiller far from the scene may be needed. Use radio or phone to assist from a distance, if necessary.
- Only emergency response personnel, in accordance with their own established procedures, should handle spills greater than 6 feet in any dimension or that are continuous. Remember, once the emergency responders or HAZMAT team is on the job cleaning up spills or putting out fires, the area is under their control and no one may re-enter the area until the responder in charge gives the all clear.
- Provide information for reports to supervisors and responders, just as in medium spills.

## **SECTION C – REPORTING SPILLS**

All chemical spills, regardless of size, should be reported as soon as possible to the Facility Responsible Person. The Responsible Person will determine whether the spill has the potential to affect the environment outside of the facility and must be reported to local, state, or federal agencies. Examples of spills that could affect the outside environment include spills that are accompanied by fire or explosion and spills that could reach nearby water bodies.

### **C.1 Reporting Thresholds**

The spill coordinator will report spills to EGLE PEAS for spills that involve the following:

- Salt spills over 50 pounds or 50 gallons of brine onto the ground or into water (required by Part 5 rules)



- Gasoline release of 32 gallons or more onto the ground (required by Part 201)
- Oil release of 50 pounds (approximately 7½ gallons) onto the ground (required by Part 5 rules)
- Any amount of oil or fuel that reaches surface water or shorelines, call MDEQ PEAS and the National Response Center (as required by the Clean Water Act and Part 31)
- Any spill that is in doubt about reporting

## **C.2 Reporting Requirements**

PEAS hotline is called immediately after becoming aware of a reportable discharge event, followed by submission of a written report within ten (10) days of release, for the reportable releases to the following:

- EGLE Water Resources Division Field Operations Chief, PO Box 30273, Lansing, Michigan 48909-7773
- Wayne County Department of Public Health, 33030 Van Born Road, Wayne, Michigan 48184

Note: the optional report form EPQ 3465 can be found at:

[https://www.michigan.gov/egle/0,9429,7-135-3307\\_29894\\_5959-20341--,00.html](https://www.michigan.gov/egle/0,9429,7-135-3307_29894_5959-20341--,00.html)

EGLE may request other follow-up reports depending on the situation.

## **SECTION D – SPILL KIT INVENTORY**

The following is a list of spill response equipment that will be maintained by the designated spill response coordinators at all locations where fuel products are stored and dispensed.

### **D.1 Minimum Spill Response Equipment**

- 20 pounds of floor dry
- 1 shovel
- 1 broom
- Caution tape
- 1 Absorbent boom
- Absorbent Socks
- Container for clean-up (30 gallons)
- Sample bottles

## **SECTION E – PROCESS FOR REVISION**

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



# 1 Introduction

---

The goal of this site-specific Storm Water Pollution Prevention Plan (SWPPP) is to identify potential pollutant sources on-site which may contribute to contaminated storm water discharges and to implement effective pollution prevention measures and Best Management Practices (BMPs) for reducing or eliminating those contamination sources. This SWPPP has been prepared in accordance with good engineering practices and the current Michigan Storm Water Permit Requirements

## 1.1 Facility Information

Woodhaven Brownstown School District Transportation Support Services (hereinafter referred to as "facility") is a school bus parking, fueling, and maintenance facility located at 24793 Van Horn Road, located in Brownstown, Michigan, in Wayne County, as shown in **Figure 1**. The facility covers approximately 4.0 acres and maintains approximately 45 school buses. Bus washing and maintenance takes place indoors, while parking and fueling occurs outside, without an overhead canopy. The entire property is asphalt with grassy or vegetated areas surrounding the perimeter boundary, as show in **Figure 2**. The property is owned by the district which conducts fueling and maintenance on service pickup trucks.

The surrounding properties consist of the local school, athletic fields, residential homes, and some commercial use. The property and surrounding area is relatively flat, with a slight slope to the south, at an elevation of approximately 605 feet above mean sea level. Vegetation surrounds the property on all sides with the exception of the eastern entrance gate.

## 1.2 Permit Applicability

The Woodhaven-Brownstown PS MS4-Wayne Permit No. MI0060064 provides authorization for point source discharges of storm water associated with District activities to waters of the State. Coverage under the Permit is only authorized after submittal of a complete National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Application and receipt by the submitter of a department-issued Individual Permit, such authorization granted as of the effective date on the Permit. A copy of the facility's Application (or MiWaters electronic submit notice) can be found as **Attachment A**.

The facility's primary function is the operation and maintenance of passenger transportation, specifically related to transportation of pupils to and from school, which has been deemed a high potential site.

Woodhaven-Brownstown PS MS4-Wayne Permit No. MI0060064 can be found in **Attachment B**.

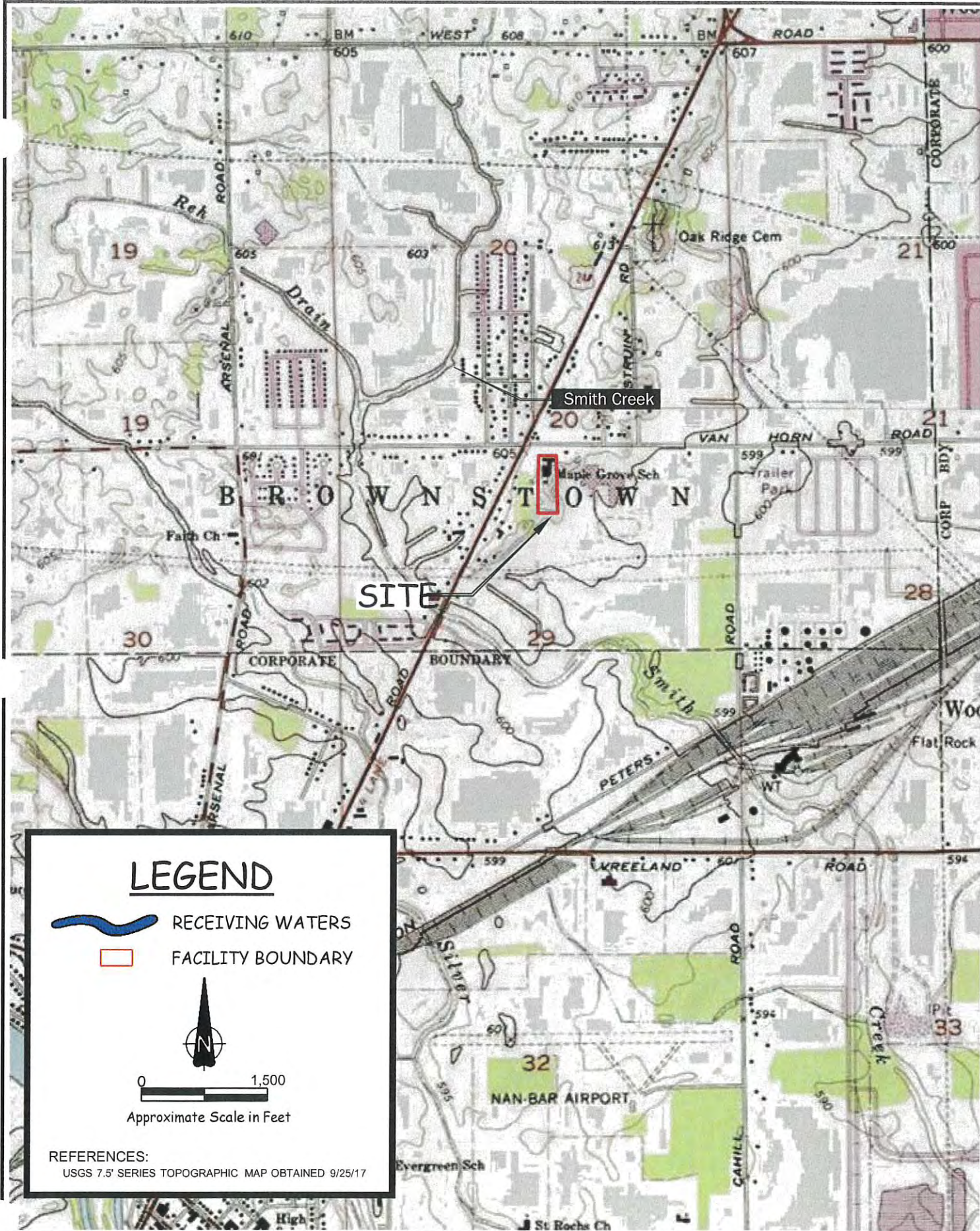
Woodhaven Brownstown School District, has prepared and implemented this site-specific SWPPP and was Issued their NPDES Individual Permit on July 30, 2021.

## 1.3 Facility Compliance for Permit Coverage

This Plan identifies the potential sources of pollution that may reasonably be expected to affect the quality of storm water discharges associated with industrial activities conducted at the facility. In addition, this Plan describes and ensures the implementation of BMPs used to reduce pollutants that may affect permitted storm water discharges from the facility and ensure compliance with the terms and conditions of the Permit for District activities.

This Plan will be updated whenever there is a change in design, personnel, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to the waters of the State. It will also be reviewed and modified, as necessary, if the SWPPP proves to be ineffective in eliminating or significantly minimizing pollutant volumes from sources identified in the Permit, or in otherwise achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. It will be reviewed for accuracy and effectiveness, at a minimum, every 12 months. All changes to this Plan will be recorded in **Attachment C** and revisions to the SWPPP implemented within 30 calendar days of changes in facility operations or of notification from the EGLE.





**Woodhaven Brownstown School District**  
 Transportation Support Services Facility  
 24793 Van Horn Rd,  
 Brownstown, Michigan

DATE: 09/25/17 FIGURE  
 DRAWN BY: CO 1

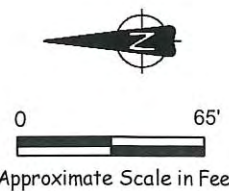
**national  
express**





# LEGEND

- Maintenance Shop Office/
- Parts Storage
- Washing Bay
- Site Boundary Fence (4 acres)
- Diesel ASTs (10,000-gal)
- Gasoline AST (500-gal)
- Used Oil AST
- New Oil AST
- Dumpster
- Drums Storage Area
- Spill Kit
- Discharge Point (SW-#) Runoff
- Path
- Oil Water Separator
- Interior Floor Drain (To Sewer)
- Storm Drain
- Fuel Dispensers
- School District Storage Areas
- Emergency Shutoff Switch
- Fluid Dispensing Room



REFERENCES:  
Google Earth Pro Image obtained  
9/25/17

Woodhaven Brownstown School District  
Transportation Support Services Facility  
24793 Van Horn Rd, Brownstown, MI



## 2 Permit Requirements

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The Federal Water Pollution Control Act (Clean Water Act), Parts 31 (Water Resources Protection) and 41 (Sewerage Systems) of the Natural Resources and Environmental Protection Act (NREPA), and Michigan Executive Order 2019-06, establish the rules, procedures, and technical criteria required to operate and discharge storm water from sites where transportation-related activities are conducted.

EGLE has implemented a four year timetable for reissuance of permits. The Woodhaven-Brownstown PS MS4-Wayne Permit No. MI0060064 became effective on August 1, 2021 and is set to expire on October 1, 2024.

### 2.1 Receiving Water Determination

The facility is located in the Huron Watershed. Run-off from the property is conveyed as sheetflow to either six drop inlet drains located in the parking areas or as sheetflow to the eastern gate entrance where it discharges to a drop inlet in the school parking lot. All discharges eventually discharge to Smith Creek located 0.35 miles southwest of the property.

Water from the building roof, eastern shop driveway entrance, and fuel tank storage area flows as sheetflow towards the eastern gate entrance. All other discharges, including parking areas and the fueling area discharge to six drop inlets located throughout the property, as show in **Figure 2**.

#### 2.1.1 Impaired Waters and Total Maximum Daily Load Requirements

Currently a TMDL Pollutant of Concern E.coli has been established for the Detroit River, the District will continue to implement the submitted TMDL Implementation plan with assistance from the Alliance of Downriver Watersheds, for which the District is an active member.

Discharges to water bodies listed as impaired under the 303(d) list are eligible for coverage under this permit, provided the facility can document that it can prevent exposure to the impaired constituent, the constituent for the impairment is not present at the facility, or provide data documenting the facilities discharge is not expected to cause or contribute to an exceedance of the water quality standard. PCB containing equipment or their use are not considered part of industrial operations onsite and were additionally not found in remnant infrastructure on the property. As such, this facility is not expected to contribute storm water runoff contaminated with any of the impairment constituents for Smith Creek or the Detroit River.

#### 2.1.2 EGLE Notifications

It is assumed by this Plan that no notification has been received from the EGLE regarding additional effluent limitations and/or stricter monitoring standards required for this facility. If notification is received, changes will be implemented to the SWPPP accordingly to maintain compliance with modified standards and such changes will be recorded in **Attachment C**.

## **2.2 Non-Permitted Discharges**

The following storm water discharges are not authorized for discharge as referenced by the General Permit:

- > Any discharge that results in the receiving waters having any of the following unnatural physical properties in quantities that are, or may become, injurious to any designated use:
  - Turbidity;
  - Color;
  - Oil films;
  - Floating solids;
  - Foams;
  - Settled solids;
  - Suspended solids; or,
  - Deposits.
- > Any discharge containing any pollutant for which a level of control is specified to meet a TMDL established by the EGLE in a concentration that exceeds the TMDL; and,
- > Discharge containing tracer dye, without approval from the EGLE.

Any unusual discharge characteristics will be reported within 24 hours to the EGLE, followed by a written report within five days detailing the findings of the investigation and the steps taken to correct the condition.

## **2.3 Non-Storm Water Discharges Allowed by the MDEQ**

Discharges are defined as any fluid/water that leaves the facility property. The most common source is a rain or snow event that causes storm water run-off. All other discharges from the site are considered non-storm water discharges. A list of allowable non-storm water discharges is listed in Part I.D.3. and is summarized below:

- > Fire hydrant flushing;
- > Potable water, including water line flushing;
- > Water from fire system testing without burned materials or chemical fire suppressants;
- > Irrigation drainage;
- > Lawn watering;
- > Pavement wash waters where contamination by toxic or hazardous materials has not occurred (unless all contamination by toxic or hazardous materials has been removed) and where detergents are not used;
- > Routine external building wash down that does not use detergents;
- > Uncontaminated condensate from air conditioners, coolers and other compressors, and from the outside;
- > Storage of refrigerated gases or liquids;
- > Foundation or footing drainage not contaminated with process materials such as solvents;
- > Springs;
- > Uncontaminated groundwater;
  - > Discharges from fire-fighting activities. Discharges from fire-fighting activities are exempted from the requirement to be identified in the SWPPP.



**2.3.1      Notice of Intent and Certification of Compliance**

N/A

**2.3.2      Stormwater Pollution Prevention Plan**

Coverage under the Permit requires implementation of this SWPPP document or other application to be covered under the General Permit. It is not necessary to submit the SWPPP to the EGLE unless requested by the Department.

**2.3.3      No Exposure Certification**

A facility regulated under the Permit may be excluded from permit requirements if there is no exposure of industrial materials or activities from precipitation or run-off. To qualify for a No Exposure exclusion from permit requirements, the operator of the facility must fill out the EGLE No Exposure Certification Application form certifying that industrial activities and materials at the facility are isolated from storm water and storm water run-off. The facility is subject to inspection by authorized EGLE personnel to determine compliance with the No Exposure Certification.

**2.4          Notice of Change**

Any anticipated action or activity, including, but not limited to, facility expansion, production increases, or process modification, which will result in new or increased loadings of pollutants to the receiving waters, will be reported to the EGLE prior to implementation.

Changes in facility management must be reported to the EGLE in writing within 10 days of the change.

**2.5          Notice of Termination**

A permittee may terminate coverage under the Permit, or may terminate the conditional No Exposure Certification, by submitting a written request for termination of the Permit once all storm water discharges are eliminated or activities have ceased.

**2.7          Permit Renewal Requirements**

The permit and authorization to discharge shall expire at midnight, October 1, 2024. In order to receive authorization to discharge beyond the date of expiration, the District shall submit an application which contains such information, forms, and fees as required by EGLE by April 4, 2024.

**2.8          Fees**

The annual fee for the Permit will be billed each January directly to the facility until permit termination or expiration is declared.

**2.9          Permit Expiration**

Permit MI0060064 expires October 1, 2024. Continuation of coverage must be applied for, in writing, along with the required fees, forms, and information, by April 4, 2024.

**2.10        Training**

All employees who are responsible for implementing activities identified in the SWPPP and who work in areas where activities are exposed to precipitation are required to complete training of the components and goals of the SWPPP.

At a minimum, training must be held annually (once per calendar year). Employee training must, at a minimum, address the following areas when applicable to a facility:

- > Summary of the facility's pollution prevention plan requirements;
- > Used oil management;
- > Spent solvent management;
- > Spill prevention, response, and control;
- > General good housekeeping practices;
- > Proper painting procedures; and,
- > Used battery management.

The employee storm water training program is included as **Attachment D** along with a blank form for use in documenting employee completion of the training program.

All employees that receive the SWPPP training will be identified in the Completed Annual Storm Water Training Program Signature Sheets and the Employee Education Signature Sheets located in **Attachment D**.

## **2.11 Recordkeeping**

All monitoring and reporting records must be retained at the facility, including:

- > Routine preventive maintenance inspection reports;
- > Routine good housekeeping inspection reports;
- > Comprehensive site inspection reports;
- > Visual assessment of storm water documentation;
- > Employee training records; and,
- > Written summaries of the annual SWPPP review.

All records and reports must be retained at the facility and be readily available for review by a MDEQ representative for a period of 3 years from the date of the record, measurement, report, application, or certification unless otherwise specified in the permit.

## **2.12 Plan Certification**

This SWPP Plan has been certified in **Attachment E** by both the acting management authority, Michael Belcher, and the on-site Certified Operator as being accurate and complete.

### 3 Pollution Prevention Response Team Description

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**Table 3-1** lists the Pollution Prevention Team (PPT) and summarizes each PPT member's responsibilities at this facility. These team members are responsible for SWPPP development and for assisting the operator or the operator's designee in the implementation, maintenance, and revisions of the Plan.

The intent of the organization of this PPT is to provide a good cross-section of appropriate supervisory and operational staff to assure compliance with the SWPPP and storm water pollution prevention measures. A manager can designate facility staff for the individual responsibilities of day-to-day storm water pollution prevention activities, as necessary.

#### 3.1 Certified Operator

All facilities that require industrial storm water permit coverage are required to have an operator certified by the EGLE, as required by Section 3110 of the NREPA. The Industrial Storm Water Certified Operator Training is conducted in the district offices. Attendance at one of the EGLE training sessions, successful completion of the certified operator exam, submission of a certification application, and payment of the certification fee to the EGLE must be completed in order to obtain the certification. Industrial Storm Water Certified Operator Certification is valid for 5 years from the year that it is issued and expires on July 1<sup>st</sup> of the fifth year. The operator must complete recertification training and postmark their recertification form, including a renewal fee to the EGLE, no later than August 31<sup>st</sup> of the year of expiration.

The Industrial Storm Water Certified Operator is responsible for;

- > Certification and updates to the SWPPP;
- > Supervision over the facility's storm water treatment and control measures included in the SWPPP;
- > Conducting inspections, monitoring, and sampling (if required); and,
- > Meeting reporting requirements.

Any changes to the on-site Certified Operator are required to be reported to the EGLE.

#### 3.2 Changes in Certified Operator

In the event the Industrial Storm Water Certified Operator at the facility changes or a new Certified Operator is added, the permittee will notify the EGLE of the change and provide the certification number for the new Certified Operator, if applicable. If the facility has more than one Industrial Storm Water Certified Operator, all of their names and certification numbers will be included in the SWPPP.

Table 3-1 Storm Water Pollution Prevention Team &amp; Contact List

Organization	Responsibility	Phone Number
<b>Senior Management Authority</b> Title: Transportation & Support Services Director / Environmental Compliance Manager Name: Michael Belcher	Provide support; sign all certifications; ensure compliance with the Permit; provide support for SWPPPP implementation; ensure regularly scheduled employee training.	Phone: (734) 783-0255 Cell: (734) 891-7337 Email: <a href="mailto:belchem@wbsdweb.com">belchem@wbsdweb.com</a>
<b>Management Authority</b> Title: Facility Manager Name: Ryan Burke	Assist in implementation of the SWPPPP; ensure compliance with the Permit; provide support for SWPPPP implementation; ensure regularly scheduled employee training.	Phone: 734-502-3678 Email: <a href="mailto:burker@wbsdweb.com">burker@wbsdweb.com</a>
<b>Certified Operator(s)</b> Certification #: PENDING / Exam Submitted to EGLE Expires: Title: Transportation & Support Services Director Name: Michael Belcher	Overall SWPPPP implementation on a daily basis; conduct periodic site inspections; conduct visual examinations of storm water quality; collect storm water samples for pollutant monitoring; complete non-storm water discharge assessment; record reportable spills/leaks of hazardous substances; conduct comprehensive site compliance evaluation; review and modify the Plan to keep it current; ensure record keeping and regularly scheduled employee training.	Phone: (734) 783-0255 Cell: (734) 891-7337 Email: <a href="mailto:belchem@wbsdweb.com">belchem@wbsdweb.com</a>
<b>Certified Operator(s)</b> Certification #: PENDING / Exam Submitted to EGLE Expires: Title: Facility Manager Name: Ryan Burke	Overall SWPPPP implementation on a daily basis; conduct periodic site inspections; conduct visual examinations of storm water quality; collect storm water samples for pollutant monitoring; complete non-storm water discharge assessment; record reportable spills/leaks of hazardous substances; conduct comprehensive site compliance evaluation; review and modify the Plan to keep it current; ensure record keeping and regularly scheduled employee training.	Phone: 734-502-3678 Email: <a href="mailto:burker@wbsdweb.com">burker@wbsdweb.com</a>

## 4 Non-Storm Water Discharges

There is no known or reported history of non-storm water discharges at this facility. Vehicle and equipment wash water is discharged to the sewer using a dedicated and covered washing bay; the operator of the sewer (City of Brownstown) has been notified and granted approval for such discharges.

Activities that have the potential for non-storm water discharges if conducted outside of designated areas are listed in the table below:

Area	Discharge Source	Discharge Characteristics	Quantity and Frequency of Discharge	Discharge Prevention Measures
Wash Bay	Bus Washing	Wash/Rinse Run-off	Intermittent	In designated wash area, wash water drains to sewer

Additionally, the facility does not have any illicit connections to a Municipal Separate Storm Sewer System (MS4) or waters of the State. Such connections will be permanently plugged or rerouted to an approved disposal method if identified in the future.

## 5 Potential Pollutant Sources

### 5.1 Site Drainage and Receiving Waters

**Figure 2** is a detailed facility site map indicating the location of the storm water outfalls. **Figure 2** also indicates the direction of storm water flow within facility boundaries, locations where significant materials are exposed to precipitation, and existing structural control measures implemented to reduce pollutants in storm water run-off.

The site map of the facility (**Figure 2**) shows the following:

- > Maintenance shop;
- > Wash bay;
- > Fluids storage room;
- > Parts storage areas;
- > Parking areas;
- > Dumpster;
- > Drum storage areas;
- > 330-gallon diesel exhaust fluid totes;
- > Fuel tanks (two 10,000-gal diesel and one 500-gal gasoline);
- > 275-used oil AST

Water from the building roof, eastern shop driveway entrance, and fuel tank storage area flows as sheetflow towards the eastern gate entrance. All other discharges, including parking areas and the fueling area discharge to six drop inlets located throughout the property, as show in **Figure 2**.

### 5.2 Evaluation of Reasonable Potential for Contribution

The following areas have been assessed for their potential contribution to storm water from the facility:

- > Loading and Unloading Areas – This activity is primarily conducted indoors, but precautions are outlined in Section 6 if alternative emergency operations are required.
- > Outdoor Storage and Secondary Containment Structures – All exterior tanks are double walled or stored under a canopy along the south side of the building. In addition, any tanks or drums under the canopy area that are not double walled are stored within secondary containment structures. Materials storage management practices are outlined in Section 6.2.1 of this Plan.
- > Outdoor Manufacturing or Processing Activities – There are no outdoor manufacturing or processing activities at this facility.
- > Significant Dust or Particulate Generation – There are no processes at this facility that generate significant dust.
- > Discharges from Vents, Stacks, and Air Emission Controls – Not applicable to the operations of this facility.
- > On-Site Waste Disposal – All waste management is conduct inside the maintenance shop using appropriate secondary containment practices. Precautions for this activity are outlined in Section 6.2 and 6.3 of this Plan.



- > Maintenance and Cleaning of Vehicles, Machines, and Equipment – Maintenance and cleaning of vehicles and equipment is conducted indoors within the shop or in the washing bay. Precautions for this activity are outlined in Sections 6.2 and 6.3 of this Plan.
- > Areas of Exposed and/or Erodible Soils – All industrial areas of the exterior grounds of the facility consist of pavement (asphalt or concrete). A grassy area of vegetated borders the property but is not exhibiting any significant signs of erosion. Detailed precautions for sediment erosion are outlined in Section 6.4 of this Plan.
- > Sites of Environmental Contamination listed under Part 201 of the NREPA – Not applicable to the operations of this facility.
- > Areas of Significant Material Residue – Maintenance operations occur within the shop which limits the area of potential significant residue to indoor areas. Some residue accumulation may occur in the parking lot area related to the general operation of adequately maintained vehicles. Precautions for this activity are outlined in Sections 6.2 and 6.3 of this Plan.
- > Areas where Animals Congregate and Deposit Wastes – Not applicable to the operations of this facility.
- > Other Areas where Storm Water may come into Contact with Significant Materials – Section 5 describes any additional exposed activities that could come into contact with storm water.

### 5.3 Inventory of Exposed Materials and Narrative Description of Activities and Potential Sources of Pollution

An inventory of the materials handled, stored, processed, treated, or disposed of in a manner that may be exposed to precipitation or run-off is summarized in Table 5-1. In many instances contact with storm water is unlikely, however the possibility of storm water contamination exists; therefore, materials associated with possible storm water contamination are also listed below. The inventory includes specific pollutants that may be attributed to these materials.

Table 5-1 Inventory of Materials/Activities Exposed to Precipitation

Exposed Material	Activity	Pollutants of Concern	Run-on	Past Spill Activity
Dumpsters (1)	Waste Storage	Municipal Waste	None	None
Fuel tanks ([2] 10,000-gal diesel, [1] 500-gal gasoline)	Fueling	Diesel and gasoline fuels and residue	Yes, due to shared site	None
Adequately Maintained Vehicles (School Buses)	Parking	Oils, Iron Oxides, Residual Automotive Materials	None	None
School district storage areas and vehicle parking (southern area of parking lot)	Material storage	Iron Oxides, Residual Automotive Materials	Yes, due to shared site	None

**Table 5-1** should be updated as necessary. Updates are to be made within thirty (30) days following a significant change that may affect the exposure of a material to precipitation and/or run-off and may reasonably be expected to add pollutants to storm water discharges. These may include changes in either:

- > The types or quantities of materials exposed to precipitation or run-off, or
- > Material management practices.

#### **5.4 Exiting Storm Water Discharge Sampling Data**

The facility has not previously collected storm water analytical data that can be included as part of this SWPPP.



## 6 Pollution Prevention Measures & Controls

The facility has developed and implemented appropriate storm water management controls, BMPs, and good housekeeping practices in order to reduce or eliminate the potential for storm water run-off contamination. Potential storm water pollutant sources at this facility are identified in Section 5.2 of this Plan, and their locations are shown on **Figure 2**. BMPs include processes, procedures, schedule of activities, elimination of practices, and other management practices, short of actual treatment methods, to reduce storm water impacts.

Pollution prevention measures are implemented for activities that are both directly and indirectly exposed to storm water to ensure storm water contamination does not occur from any areas or activities. The BMPs for this facility are discussed in the following subsections.

### 6.1 Good Housekeeping Measures

Often, the most effective first step toward preventing storm water contamination from industrial sites simply involves using good common sense to improve the facility's basic housekeeping methods. A clean and orderly work area will reduce the possibility of accidental spills caused by mishandling of chemicals and equipment, as well as reduce facility personnel exposure to safety hazards. Good housekeeping BMPs implemented at the facility will reduce the amount of pollutants generated on-site, including those that may come into contact with storm water.

The following good housekeeping procedures should be implemented, as applicable:

- > Store materials for the shortest period of time possible to avoid corrosion that could happen from long-term exposure;
- > Cover used tire storage area to the maximum extent practicable until taken off-site for proper disposal;
- > Conduct checks for corrosion and leaks of storage tanks, drums, totes, waste disposal containers, and vehicles located both inside and outside the facility;
- > Dispose of or recycle grease rags properly;
- > Promptly transfer used fluids to the proper container;
- > Use drip pans while loading/unloading diesel tanks or conducting vehicle maintenance;
- > Empty and clean drip pans and containers regularly;
- > Keep lids closed on garbage and recycling containers stored outdoors;
- > Inspect the facility regularly for proper implementation of control measures; and
- > Keep areas swept, neat, and orderly.

### 6.2 Best Management Practices

Each industrial activity that occurs on-site that has the potential to be exposed to storm water is discussed below, followed by a descriptive summary of BMPs that will be employed.

#### 6.2.1 Material Storage Areas

Most materials are kept within the building. There is one solid waste dumpster with lid located in the parking lot to the southeast of the maintenance building. Used batteries are stored indoors, on the south wall toward the east end of the maintenance building. Greases, lubricants, paints, and other liquids are kept indoors in flammables storage cabinets or on shelves. Adequately maintained buses are parked in the

outdoor, uncovered, parking area. Storm water from the parking areas can be contaminated with metals, oil, grease, fuel, and solvents when materials are contacted by precipitation or are carried by storm water run-off, or by spills or leaks in exposed areas.

- > All containers should be kept closed at all times, except when adding or removing materials.
- > Employees responsible for loading or unloading wastes, chemicals, and other materials should be properly trained and familiar with emergency spill cleanup procedures.
- > Safety Data Sheets (SDS) for substances stored on-site should be readily accessible in the event of an emergency.
- > Spill containment equipment appropriate to the size of the operation should be located where maintenance activities are performed or materials are stored. Such equipment includes waste material storage containers, drip pans, and absorbent materials. Spills should be cleaned up and reported to the appropriate environmental staff immediately.
- > Drums should be kept tightly sealed and indoors, if possible.
- > Containment structures and/or containment pallets should be used for drums, tanks, and other containers that are periodically accessed. Containment structures or containment pallets should also be used for drums and containers where waste products are stored prior to transport and off-site disposal.
- > Lubricating oils, used oil, and other material containers should be stored indoors whenever possible. If stored outdoors, containers should be kept in a covered area on spill containment pallets and/or in an area equipped with adequate secondary containment and transfer drip pans. All containers should be clearly labeled with the container's contents.
- > Sweep and clean up any sediment transfer from traffic through the parking lot.
- > The operator should have spill cleanup materials for use in a readily accessible location.
- > Spills should be cleaned up and reported to the Facility Manager and Director immediately.

#### **6.2.2 Fueling Area**

Accidental releases from the tanks during fuel transfer could contaminate storm water.

- > The tanks, valves, and all other refueling equipment (e.g., hoses, pumps, etc.) should be visually inspected for leaks and mechanical deficiencies by the operator before refueling activities begin.
- > The operator should have spill cleanup materials for use in a readily accessible location.
- > Spills should be cleaned up and reported to the Facility Manager and Director immediately.

#### **6.2.3 Bus Washing**

Bus washing takes place inside the enclosed wash bay. Wash water is directed to a floor drain leading to an oil water separator and is discharged to the sanitary sewer.

- > Prior to beginning washing, the oil/water separator should be inspected to insure wash water will be collected in the oil/water separator for removal and off-site disposal.
- > If the oil/water separator is not functioning properly, prior to beginning washing, areas downslope of the bus should be blocked off with a boom to contain water and water vacuumed up for off-site disposal.

#### **6.2.4 Bus Maintenance and Storage**

Maintenance is performed indoors; however, if maintenance must occur outdoors, precautions will be taken to prevent oil, grease, and other fluids from contacting the ground and potentially contaminating storm water run-off.

- > Daily visual inspections of buses should be performed to verify that fuel, oil, and grease are not entering into storm water drainage areas.
- > Bus drivers should be reminded to use dry cleaning techniques on the exterior of the buses and to dispose of mop water to shop drains (which discharge to the sewer).

### **6.3 Preventive Maintenance Program**

Permanent structural BMPs are used to divert, infiltrate, reuse, or otherwise reduce pollutants in storm water discharges from the site. Facility operators will implement a preventive maintenance program to inspect all structural controls, such as secondary containment, drip pans, and storm water drainage pathways in place at the facility during routine site inspections. Structural controls will be maintained at intervals necessary to prevent failures that could result in a discharge of pollutants. Cleaning and maintenance of the structural controls will also be recorded in facility maintenance records.

Maintenance records must include documentation of the estimated volume of solids removed from each control structure. These estimates aid in assessing the effectiveness of existing structural controls.

#### **6.3.1 Secondary Containment Structures and Oil/Water Separator**

Secondary containment devices should be inspected regularly and cleaned as necessary. All standing liquid will be removed from any containment structures to maintain maximum holding capacity. Secondary containment structures will be officially inspected during the quarterly inspection, but will also be monitored during routine operations onsite.

The facility is also equipped with an oil-water separator (OWS), which is designed to collect sediment and debris from runoff, and also collects runoff from the wash bay areas. The OWS should be checked for accumulated sediment and debris during routine facility inspections and cleaned as necessary. The OWS will be maintained at least annually to remove accumulated debris and maintain efficiency.

#### **6.3.2 Vehicle Inspections**

Routine inspection of each vehicle is completed daily by the drivers to ensure there are no fluid leaks within the facility's fleet. Vehicles identified to have leaks will be immediately be taken out of service and leak prevention devices (e.g., drip pans, etc.) will be implemented to prevent discharged contaminants from reaching the ground.

### **6.4 Structural Control for Sediment and Erosion**

All of the exterior grounds of the facility consist of pavement (asphalt or concrete). A grassy boundary is present surrounding the property but is not exhibiting any significant signs of erosion. If any signs of erosion are noticed, the facility will implement structural and/or stabilization measures necessary to minimize its effects. The facility is graded in a manner to reduce the interaction of rainwater with exposed industrial activities. The facility has evaluated the use of additional grading, berms, and curbing and found the facility is already adequately designed to assist in storm water management. As such, the installation of additional structural controls was deemed not necessary at the time of this report.

### **6.5 Spill Response Procedures**

The facility will immediately clean up any spills or leaks that occur on-site using absorbents or vacuuming techniques to prevent the discharge of pollutants. This plan includes a detailed Spill Prevention Procedures Protocol chapter that includes spill response actions and notification requirements, included as Section 7 of this report.

Other spill-related BMPs implemented at the facility include:

- > Labeling of materials, including "used oil" and "spent solvents," and

> Preventative maintenance.

## **6.6 Employee Training**

The employee training program is outlined in Section 2.10 of this plan and included as **Attachment D**.

## **6.7 Best Management Practices (BMPs) Support for TMDL**

Currently a TMDL Pollutant of Concern E.coli has been established for the Detroit River, the District will continue to implement the submitted TMDL Implementation plan with assistance from the Alliance of Downriver Watersheds, for which the District is an active member.

## 7 Spill Prevention & Emergency Cleanup Plan

The facility has developed and implemented spill prevention and response measures to adequately respond to a spill.

Spill prevention and response measures include the following, as applicable:

- > Notification to management - the first person on the scene should immediately notify the Director/ Environmental Manager and Facility Manager using established facility procedures for emergency contact. Once notified, the Environmental Manager must determine the need to notify authorities and regulatory agencies, as well as the actions required to safeguard personnel (e.g., evacuation, personal protection, etc.).
- > Identification of areas where a spill could contribute pollutants to storm water discharges;
- > Implementation of procedures to minimize or prevent contamination of storm water from spills (e.g., periodic equipment inspections for leaks; installation of secondary containment structures around liquid storage tanks and drums; modification of material handling techniques; monitoring of tank alarm systems; and routine inspections of drums, tanks, and other storage containers);
- > Clear labeling of drums, tanks, and other containers;
- > Clear labeling of hazardous waste containers that require special handling, storage, use, and disposal;
- > Implementation of specific spill prevention and cleanup techniques;
- > Availability of material and equipment necessary for spill cleanup;
- > Inventory maintenance of spill cleanup materials and equipment; and
- > Completion of regularly scheduled employee training.

### 7.1 Potential Spill Areas

The following areas have been identified as areas where spills could contribute pollutants to storm water discharges:

- > Liquid storage area(s) (indoors);
- > Maintenance bays (indoors); and
- > Bus wash areas (indoors).

### 7.2 BMPs to Prevent Contamination of Stormwater from Spills

#### 7.2.1 Automotive Fluid Transfer and Storage

All tanks and containers storing liquids at the facility are compatible with the contents held, clearly labeled, and meet applicable state and federal regulations. Secondary containment is used for all ASTs to prevent spills and leaks from leaving the building and coming in contact with the ground and storm water run-off. Liquid storage, transfer, and use is performed inside of the building. Spill materials are stored nearby in case of a spill or leak.

#### 7.2.2 Maintenance Area Loading/Unloading

All containers storing lubricant, oil, or other automotive fluids are compatible with the contents held and meet applicable state and federal regulations. Liquids are unloaded directly inside the building. Liquid materials

are stored in their original containers, tightly sealed, and clearly labeled. Spill materials are stored nearby in case of a spill or leak.

### 7.3 Spill Notification and Emergency Response Procedures

In the event of a spill, all facility personnel should be aware of and able to implement the spill response procedures discussed above and in the quick reference section in the beginning of this Plan. **Attachment F** includes a summary recording sheet to be used during the agency notification process.

### 7.4 Spill Records

The facility will keep a record of all spills that occurred during the past 3 years that document the time, volume, exact location of each release, and the action taken to clean up the spilled materials. Recordable spills will be documented in **Attachment G**. The facility must update the SWPPP within 14 days of obtaining knowledge of any spills at the facility.

### 7.5 Spill Equipment

Spill equipment is stored in various areas around the facility. An inventory of spill cleanup materials at the facility should be maintained and cleanup equipment should be restocked as necessary.

#### Spill Cleanup Materials Inventory

Spill Cleanup Materials	Location
55-gallon drums containing various spill materials	Maintenance building, fueling area, and fuel tank area
Additional Absorbent pads	Maintenance building
Additional Floor-Dry absorbent	Maintenance building

## **7.6 Pollution Incident Prevention Plan (PIPP)**

The facility is subject to the Pollution and Incident Prevention Plan (PIPP) requirements and subject to the Spill Prevention Control Countermeasure (SPCC) requirements under 40 CFR 122.22. PIPP requirements have been integrated into the on-site site-specific SPCC plan.

## 8 Quarterly Inspections

### 8.1 Stormwater Discharge Locations

As part of this plan, local topography and storm water drainage pathways were reviewed. The drainage of rainwater from all areas of facility operations is anticipated to be captured by the following discharge locations:

**Drainage #1 (SW-1):** Captures water from the building roof, eastern shop driveway entrance, and fuel tank storage area, flowing as sheetflow towards the eastern gate entrance where it discharges to the school parking lot. The sampling location is labeled as SW-1 on **Figure 2**. Stormwater from this location eventually discharges to the drop inlet in the school parking lot. Discharges from this drainage contact the building roof, garage driveway entrance, and fuel storage tanks. There are no structural BMPs implement for this drainage. The anticipated run-off coefficient from this drainage is considered high at 100%.

**Drainage #2 (SW-2):** Captures water from the fueling area and parking area located to the south of the facility building, discharging directly to an adjacent drop inlet. The sampling location is labeled as SW-2 on **Figure 2**. Discharges from this drainage contact the fuel dispensers and a portion of the parking lot with adequately maintained buses. There are no structural BMPs implemented for this drainage. The anticipated run-off coefficient from this drainage is considered high at 100%

**Drainage #3, 4, 5, 6, and 7 (SW-2, 3, 4, 5, 6 and 7):** Captures water from the parking areas located throughout the property, discharging directly to drop inlets labeled as SW-3 through SW-7 on **Figure 2**. Discharges from the drainages contact the parking lot and adequately maintained buses. There are no structural BMPs implemented for this drainage. The anticipated run-off coefficient from this drainage is considered high at 100%

### 8.2 Quarterly Timeframes

The quarterly inspections are required to be completed within the following time intervals:

- > Quarter 1: January through March;
- > Quarter 2: April through June;
- > Quarter 3: July through September; and,
- > Quarter 4: October through December.

### 8.3 Quarterly Comprehensive Site Inspection

Comprehensive site inspections are to be conducted quarterly by the facility's Industrial Storm Water Certified Operator (or other qualified and properly trained person). Areas contributing to a storm water discharge associated with industrial activity are visually inspected for evidence of, or the potential for, pollutants entering the drainage system. Measures to reduce pollutant loadings are evaluated to determine whether they are adequate and are properly implemented. Structural storm water management measures, sediment and erosion control measures, and other structural pollution prevention measures identified in the Plan are observed to ensure that they are operating correctly. These inspections also include a review of the routine preventive maintenance operations, good housekeeping inspection reports, and any other paperwork associated with the SWPPP.

The results of the evaluation will determine whether the Plan requires revision, which should be implemented no later than 12 weeks after the evaluation or prior to the next evaluation, whichever occurs first.

A report summarizing the scope of the evaluation, the personnel making the evaluation, the dates of the evaluation, major observations relating to the implementation of the SWPPP, and actions taken to revise the SWPPP should be made and retained for at least 3 years. The report will identify any needed maintenance or



repairs and areas of non-compliance. In the event there are no areas of non-compliance, the report will contain any corrective actions taken and a certification that the facility is in compliance with the SWPPP and the permit.

**Attachment H** includes a copy of the inspection report that is completed quarterly. Follow-up procedures are used to ensure that appropriate actions are taken in response to the inspections. The following areas are included in all inspections:

- > Structural controls;
- > Storage area for vehicles and equipment awaiting maintenance;
- > Material storage areas; and,
- > Loading and unloading areas.

## **8.4 Wet Weather Observations**

Facility operators will collect an observation sample from storm water discharges from two storm events per year. To ensure the sample is representative of the discharge, the sample collection container will be cleaned prior to use.

Examinations will be made of samples collected within the first 30 minutes (or as soon thereafter as practical, but not to exceed 1 hour) of when the run-off or snowmelt begins discharging. The examinations will document observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution. Visual review of the water must be made within 48 hours of collecting the sample.

The examination must be conducted in a well-lit area. No analytical tests are required to be performed. All observation samples will be collected from discharge resulting from a storm event that is greater than 0.1 inch in magnitude and occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Photographic evidence of each sample against a white background should be maintained along with the written report. Where practicable, the same individual should carry out the collection and examination of discharges for the entire permit term. Observations are only required during daylight hours, unless there is insufficient rainfall or snow melt to produce a run-off event. Use the Wet Weather Observation Form in **Attachment H** to record all required information and attach a photo of the sample against a white background.

Where samples cannot be obtained due to adverse weather such as tornados or hurricanes, this reason must be documented in the Wet Weather Observation Form and retained on-site.

### **8.4.1 Exceptions to Monitoring**

Where samples cannot be obtained due to adverse weather such as tornados or hurricanes, this reason must be documented in the Wet Weather Observation Form and retained on-site.

If no storm event resulted in run-off during daylight hours from the facility, the monitoring schedule may be redistributed; however, two monitoring events will still be required throughout the year

### **8.4.2 Sample Collection Location(s)**

Each storm water discharge point, outlined in Section 8.1 above, should be included as a routine sampling location. If the facility has two or more discharge points that are believed to discharge substantially identical storm water effluents, the facility may conduct visual assessments of the discharge at just one of the discharge points and report that the results also apply to the other substantially identical discharge points. **Figure 2** outlines the facility's sampling locations, SW-1 in the parking area to the west of the maintenance building and SW-2 in the parking area to the east of the maintenance building.

**8.4.3      Substantially Identical Discharges**

Based on the industrial activities present at the drainage locations outlined in Section 8.1 above, drainages SW-3 through SW-7 are considered substantially identical outfalls at this facility. As such, monitoring will be conducted at only one of these outfalls. The facility will continually switch which outfall they use to conduct monitoring as outlined in the General Permit. Documentation will be recorded in the monitoring forms that the facility is sampling substantially identical outfalls.

**Summary of outfalls to be monitored:**

- > SW-1 (east gate entrance); and
- > SW-2 (drain south of fuel dispenser area, directly east of fuel ASTs); and
- > One outfall from SW-3 through SW-7 (parking lot drains), switching outfall each monitoring event.

## 9 SWPPP Review and Reporting Requirements

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### 9.1 Progress Report and SWPPP Review

The District is required to submit an electronic Progress Report to the EGLE by April 1<sup>st</sup> every two years. The report is intended to document that a review of the SWPPP and overall District compliance has been completed. Annually the SWPPP must be reviewed to document if any updates or changes were necessary to ensure the plan's effectiveness and compliance with conditions set forth in the Permit. The review will be completed by the Industrial Storm Water Certified Operator. Any amendments or changes to the SWPPP will be recorded in **Attachment C**.

Access to the MiWaters database must be obtained by creating an ID and requesting access to the facility through the online portal (<https://miwaters.deq.state.mi.us/miwaters/>).

### 9.2 Facility Changes

In addition to receiving the Progress Report, EGLE must be notified whenever changes at the facility have the potential to increase the exposure of significant materials to storm water, significant spills occur at the facility, or when the SWPPP is determined to be ineffective by the permittee or the EGLE. The facility shall incorporate necessary changes to the SWPPP within 30 days of the finding of noncompliance and submit written certification of these changes to the EGLE.

### 9.3 Noncompliance Notifications

A report of noncompliance shall be submitted to the EGLE anytime the conditions outlined below are exceeded. The written reporting shall include:

- > A description of the discharge and cause of noncompliance; and,
- > The period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue, and the steps taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Reports are required to be submitted through the MiWaters database unless specifically outlined below.

#### 9.3.1 24-hour Reporting

Any noncompliance which may endanger health or the environment shall be reported, verbally, within 24 hours of the time the permittee becomes aware of the noncompliance. A written submission shall also be provided within five (5) days.

#### 9.3.2 Other Reporting

The permittee shall report, in writing, all other instances of noncompliance not described in 9.2 above at the time monitoring reports are submitted; or, in the case of retained self-monitoring, within five (5) days of the time the permittee becomes aware of the noncompliance.

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**A**

NPDES MS4  
Permit Application

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

version 1.8

(Submission #: 2Q0-GZNX-BWJC, version 3)

## Details

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**Submission ID** 2Q0-GZNX-BWJC

**Submission Reason** Renewal

**Status** Complete

## Form Input

---

### Existing Permit Details

**Existing Permit ID (Read Only)**

5680707939689638042

**Existing Permit Number (Read Only)**

MIG610359

### Section 1. Applicant Information

#### Applicant Information

**Prefix**

Mr.

**First Name**

Michael

**Last Name**

Belcher

**Title**

Director of Contracted Services

**Organization Name**

Woodhaven-Brownstown School District

**Phone Type**

**Number**

**Extension**

Business

7347892862

**Email**

belchem@wbsdweb.com

**Fax**

NONE PROVIDED

**Address**

24821 Hall Rd

Woodhaven, MI 48183

US

### Section 2. MS4 Location Information

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

Woodhaven-Brownstown PS 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**

42.1258066,-83.2460461

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

---

**CONTACTS**

---

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

**Contact**

Storm Water Billing Contact  
Storm Water Program Manager  
Application Contact

**Contact****Prefix**

Mr.

**First Name**

Michael

**Last Name**

Belcher

**Title**

Director of Contracted Services

**Organization Name**

Woodhaven-Brownstown School District

**Phone Type**

Business

**Number**

7347892862

**Extension****Email**

belchem@wbsdweb.com

**Fax**

NONE PROVIDED

**Address**

24821 Hall Rd

Woodhaven, MI 48183

USA

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

---

**CONTACTS**

---

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

**Contact**

Storm Water Billing Contact  
Storm Water Program Manager  
Application Contact

**Contact****Prefix***Mr.***First Name**

Michael

**Last Name***Belcher***Title***Director of Contracted Services***Organization Name***Woodhaven-Brownstown School District***Phone Type****Number****Extension**

Business

7347892862

**Email**

belchem@wbsdweb.com

**Fax**

NONE PROVIDED

**Address**

24821 Hall Rd

Woodhaven, MI 48183

USA

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

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

[Urbanized Area Link](#)**Select an Urbanized Area**

Detroit

**Outfall and Point of Discharge Information**

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

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

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

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

An example table is available at the link below.

[Outfall and Point of Discharge example table link](#)**OUTFALL AND POINT OF DISCHARGE INFORMATION**[Appendix A Outfall Table WBSD.pdf - 03/25/2017 11:33 AM](#)**Comment**

See Appendix A

**NOTE (CREATED)****APPROVED**Created on 10/22/2019 12:47 PM by **Erica Volansky**

## Nested Jurisdictions

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

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

### Nested Jurisdiction

**Prefix**

NONE PROVIDED

**First Name**

NONE PROVIDED

**Last Name**

NONE PROVIDED

**Title**

NONE PROVIDED

**Organization Name**

NONE PROVIDED

**Phone Type****Number****Extension**

NONE PROVIDED

**Email**

NONE PROVIDED

**Fax**

NONE PROVIDED

**Address**

[NO STREET ADDRESS SPECIFIED]

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

USA

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

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### STORM WATER MANAGEMENT PROGRAM (SWMP)

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

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

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

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

When answering the questions in this section of the Application, the applicant's MS4 encompasses what the applicant



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

[USEPA measurable goals guidance document link](#)

### Enforcement Response Procedure (ERP)

---

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

#### ERP

[APPENDIX B ERP\\_WBSD.pdf - 03/25/2017 12:01 PM](#)

##### Comment

See Appendix B

NOTE (CREATED)

APPROVED

Created on 10/23/2019 10:17 AM by Erica Volansky

### Public Participation/Involvement Program (PPP)

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

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

Yes

#### PPP Procedures

[APPENDIX C Public Participation Program WBSD.pdf - 03/13/2017 01:26 PM](#)

##### Comment

See Appendix C for the Collaborative PPP

NOTE (CREATED)

APPROVED

Created on 10/22/2019 1:07 PM by Erica Volansky

**2. Provide the reference to the procedure submitted above for making the SWMP available for public inspection and comment. The procedure shall include a process for notifying the public when and where the SWMP is available and of opportunities to provide comment. The procedure shall also include a process for complying with local public notice requirements, as appropriate. (page and paragraph of attachments): e.g., Attachment A, Page 3, Section b.**  
APPENDIX C, Page 2, II Communication During the SWMP Development Process, 1. & 2. APPENDIX C, Page 2-3, III Procedures for Public Inspection, Comment and Participation in Implementation and Review, BMP 1.1 - BMP 1.4

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

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

### Section 6. Public Education Program

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

Yes

## PEP Procedures

Appendix D-ADW\_PEP\_04192019\_approved(1).pdf - 01/02/2020 09:52 AM

### Comment

See Appendix D: COLLABORATIVE PUBLIC EDUCATION PLAN

#### CORRECTION REQUEST (APPROVED)

##### Upload approved ADW PEP document.

The ADW's final PEP was approved in May 2019. This document needs to be uploaded before a permit can be issued. Please also make sure that any application references are updated, if necessary.  
Created on 10/22/2019 1:18 PM by Erica Volansky

#### NOTE (CREATED)

##### APPROVED

Created on 2/9/2021 4:48 PM by Erica Volansky

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

See Appendix D, Pg 6-7 Section III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

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

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

An example PEP table is available at the link below.

[PEP table example link](#)

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

See Collaborative Public Education Plan Table and Appendix D: Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3 & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity 8, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #10: Promote county household hazardous waste reduction program, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #9: Promote water resource protection workshops, & PEP Table

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

See Appendix D: Collaborative Public Education Plan Table and Section IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs- Activity #1, Activity #2, Activity #3, Activity #4: Support green schools program with incentives to qualifying ADW schools, & PEP Table

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

See Appendix D: pg 15, Section VII. EVALUATION OF EFFECTIVENESS

## **Section 7. Illicit Discharge Elimination Program**

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

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

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

Yes

### **Illicit Discharge Elimination Program Procedures**

[Appendix E -ADW Collaborative IDEP approved Feb 2019.pdf - 01/02/2020 09:54 AM](#)

[Illicit Discharge Elimination Policy - memo - 2020.01.07.pdf - 01/07/2020 01:54 PM](#)

#### **Comment**

See Appendix E

#### **CORRECTION REQUEST (APPROVED)**

**Upload approved ADW IDEP.**

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

Created on 10/22/2019 1:20 PM by **Erica Volansky**

#### **NOTE (CREATED)**

**APPROVED**

See uploaded IDEP policy in addition to collaborative IDEP in the application.

Created on 2/9/2021 4:49 PM by **Erica Volansky**

## Storm Sewer System Map

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

District Support Services Office

### Illicit Discharge Identification and Investigation

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

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

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

See Appendix E: 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.

See Appendix E: 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.

See Appendix E: IDEP #7 "The District additionally will perform one full dry weather screening of all district owned outfalls during the permit cycle."

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

See Appendix E: Protocol Flow Chart & Field Screening Procedure

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

See Appendix E: IDEP #6

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

See Appendix E: IDEP #2 & #7

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

See Appendix E: IDEP #7

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

See Appendix E: Release Notification Requirements

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

NONE PROVIDED

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

See Appendix E: Protocol Flow Chart

#### **IDEP Training and Evaluation**

---

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

- Techniques for identifying an illicit discharge or connection, including field observation, field screening, and source investigation.
- Procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.
- The schedule and requirement for training at least once during the term of this permit cycle for existing staff and within the first year of hire for new staff.

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

See Appendix E: IDEP #4

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

See Appendix E: IDEP #10

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

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

See Appendix E: Legal Authority

**CORRECTION REQUEST (APPROVED)**

**The school district must submit a regulatory mechanism that addresses Q. 20 - 26.**

Please see Page 11 of the attached IDEP guidance document. Public institutions, such as school systems, are required to develop a regulatory mechanism that prohibit non-stormwater discharges, regulate the contribution of pollutants, prohibit illicit discharges, and require enforcement of illicit discharges. The School Board should then approve the SWMP. Please see attached examples of acceptable regulatory mechanisms developed by other school systems as well as an example board resolution.

Created on 10/22/2019 1:52 PM by Erica Volansky

**1 COMMENT**

**Brent Florek (bflorek@charlesraines.com) (1/7/2020 1:53 PM)**

The District is in the process of adopting the WBSD ILLICIT DISCHARGE ELIMINATION POLICY, which is crafted from the example language you have provided as attached reference (Troy Example)- See attached District Superintendent Memo

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

**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.**

N/A - See Appendix B ERP

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.

N/A - See Appendix B ERP

## **Section 8. Construction Storm Water Runoff Control Program**

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

No

### **Qualifying Local Soil Erosion and Sedimentation Control Programs**

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

27. Is the applicant a Part 91 Agency?

No

If yes, choose type

NONE PROVIDED

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

Wayne County Land Resources Management Division (LRMD)

### **Construction Storm Water Runoff Control**

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

[Appendix F-Part91 WBSD.pdf - 01/02/2020 10:19 AM](#)

**Comment**

Appendix F

**NOTE (CREATED)**

**APPROVED**

Created on 2/9/2021 5:00 PM by Erica Volansky

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

See Appendix F, Page 2, Section B

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

See Appendix F, Page 2, Section B & Page 3, Section D

**CORRECTION REQUEST (APPROVED)**

**Indicate when EGLE will be contacted.**

Please state in Section D how soon after a discharge is identified that EGLE will be contacted. EGLE recommends that the PEAS hotline is called immediately after becoming aware of a reportable discharge event. Also update App H - Spill Response Section C with this information.

Created on 10/28/2019 11:47 AM by Erica Volansky

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

See Appendix F, Page 2, Section B

**CORRECTION REQUEST (APPROVED)**

**Include construction activity within 500 feet of waterbody.**

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

Created on 10/28/2019 11:26 AM by Erica Volansky

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

See Appendix F, Page 3, Section E

## **Section 9. Post-Construction Storm Water Runoff Program**

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

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

>>Click here to access the Post-Construction Storm Water Runoff Program Compliance Assistance Document

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

Appendix G\_POSTCONSTRUCTION\_WBSD.pdf - 03/30/2017 11:20 AM

Existing Controls Storm Water Resolution.pdf - 03/30/2017 11:20 AM

Existing Storm Water Ordinance06.pdf.pdf - 03/30/2017 11:20 AM

**Comment**

See Appendix G & Existing Stm Water Runoff Program

**NOTE (CREATED)**

**APPROVED - New resolution required 2020**

When the school district does adopt the new Wayne County post-construction ordinance, just the signed board resolution will need to be provided.

Created on 10/28/2019 12:55 PM by Erica Volansky

## **Ordinance or Other Regulatory Mechanism**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.



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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Federal Facilities**

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

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

No, skip to Question 36

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

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

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

NONE PROVIDED

#### **Water Quality Treatment Performance Standard**

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

NONE PROVIDED

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

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

#### **Sources**

NONE PROVIDED

**Other rainfall data source (page and paragraph of attachments)**

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Channel Protection Performance Standard**

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

or redevelopment. If not available at this time, provide the date the ordinance or regulatory mechanism will be available.

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

#### **Site-Specific Requirements**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

**Site Plan Review**

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

NONE PROVIDED

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

The District intends to adopt the updated Wayne County Stormwater Management Standards. These standards are currently being drafted by Wayne County. The District will review them when available within 6 months of being finalized.

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

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## Pollution Prevention and Good Housekeeping Program Procedures

[Appendix H Inventory 2 of 3.pdf - 03/30/2017 05:29 PM](#)

[WBSD Vehicle Fueling Procedure.pdf - 03/30/2017 05:30 PM](#)

[Appendix H PPGH\\_3 of 3 WBSD.pdf - 01/02/2020 10:16 AM](#)

[WBSD MS4 Inspection and Maintenance Field Sheets.pdf - 01/03/2020 09:17 AM](#)

[Appendix H PPGH\\_GENERAL\\_1 of 3 WBSD.pdf - 01/08/2020 10:40 AM](#)

[Support Services Building SWPPP SPCC PIPP.pdf - 01/08/2020 10:41 AM](#)

[Environmental Awareness Training.pdf - 01/08/2020 10:41 AM](#)

[Spill Prevention Training.pdf - 01/08/2020 10:42 AM](#)

### Comment

See Appendix H

NOTE (CREATED)

**APPROVED**

Created on 2/9/2021 5:02 PM by Erica Volansky

## Municipal Facility and Structural Storm Water Control Inventory

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

See Appendix H: PPGH General Table 1 & Appendix H Inventory

CORRECTION REQUEST (APPROVED)

**Location of facilities is missing.**

Each facility needs to have an address. Please correct.

Created on 10/28/2019 5:03 PM by Erica Volansky

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

Bus Stations and Garages

Fleet maintenance facilities

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

Public parking lots

Public schools

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

Catch basins

Detention basins

Oil/water separators

Secondary containment

**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)**

The Support Services Office 23793 Van Horn Road, Brownstown, MI 48134-9231

**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.**

See Appendix H: PPGH General, Section C

**CORRECTION REQUEST (APPROVED)**

**Timeframe for updating inventory is too long.**

The timeframe for updating/revising the inventory is too long. EGLE recommends a timeframe of 30 days. Please correct.  
Created on 10/28/2019 4:35 PM by Erica Volansky

**Facility-Specific Storm Water Management**

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

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

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

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

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

See Appendix H: PPGH General, Section B, Section D & Table 1

**If not applicable**

NONE PROVIDED

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

See Appendix H: PPGH General, Section D & Table 1

**CORRECTION REQUEST (APPROVED)**

**The Support Services Facility should be considered a high priority facility.**

Although bus washing and all equipment repairs are conducted inside the building, there are stockpiles stored on-site as well as above-ground storage tanks. This would qualify the Facility for site-specific operating procedures. Please update Section D and Table 1 to state this.

Created on 10/28/2019 5:30 PM by Erica Volansky

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

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

**CORRECTION REQUEST (APPROVED)**

**Please provide a SOP for the Support Services Facility.**

See correction request for Q. 64.

Created on 10/28/2019 5:33 PM by Erica Volansky

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

**CORRECTION REQUEST (APPROVED)**

**Update references for Q. 65 - 69.**

After submitting the SOP for the Support Facility, please update the references for Q. 65 - 69 to refer to the appropriate sections of the SOP.

Created on 10/28/2019 5:35 PM by Erica Volansky

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Attached WBSD Vehicle Fueling Procedure, SPCC Plan, and PIPP Plan

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

See Appendix H: PPGH General, Section D & Table 1

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

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

See Appendix H: PPGH General, Section F, Section G, & Section H

**CORRECTION REQUEST (APPROVED)**

**Missing Section H.**

Please include Section H in the General Procedures SOP.  
Created on 10/29/2019 11:10 AM by **Erica Volansky**

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

See Appendix H: PPGH General, Section F

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Appendix H - Structural Control Inventory provides the geographic location of the catch basins. Please edit the reference to state this.

Created on 10/29/2019 11:12 AM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section F, Section G, Section H, and attached WBSD MS4 Inspection and Maintenance Field Sheets

**CORRECTION REQUEST (APPROVED)**

**Provide standardized form used in catch basin inspections.**

Under Section G a standardized form is referenced when inspecting catch basins. Please provide this form for review.

Created on 10/29/2019 11:20 AM by **Erica Volansky**

**CORRECTION REQUEST (APPROVED)**

**Measurable goals are missing.**

Under Section G of the General SOP, there is a space for measurable goals but it has none listed. Please edit the document to include measurable goals.

Created on 10/29/2019 11:15 AM by **Erica Volansky**

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section G & Section H

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

See Appendix H: PPGH General, Section J



**CORRECTION REQUEST (APPROVED)**

**Missing Section J.**

Please include Section J in the General Procedures SOP.  
Created on 10/29/2019 11:13 AM by Erica Volansky

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

See Appendix H: PPGH General, Section K and Section J

**CORRECTION REQUEST (APPROVED)**

**Missing Section K.**

Please include Section K in the General Procedures SOP.  
Created on 10/29/2019 11:16 AM by Erica Volansky

**Municipal Operations and Maintenance Activities**

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

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

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

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

See Appendix H: PPGH General, Section E

**CORRECTION REQUEST (APPROVED)**

**Incorrect reference.**

Please refer to the WBSD Vehicle Fueling SOP.  
Created on 10/29/2019 11:22 AM by Erica Volansky

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

See Appendix H: PPGH General, Section I & H

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

See Appendix H: PPGH General, Section I & H

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

See Appendix H: PPGH General, Section I & H

**CORRECTION REQUEST (APPROVED)**

**Measurable goals are missing.**

Under Section G of the General SOP, there is a space for measurable goals but it has none listed. Please edit the document to include measurable goals.

Created on 10/29/2019 11:42 AM by Erica Volansky

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

[Catch Basin Cleaning Activities Guidance Document](#)

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

See Appendix H: PPGH General, Section H

### **Managing Vegetated Properties**

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

[Commercial Pesticide Application Certification Categories](#)

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

See Appendix H: PPGH General, Section L

### **Contractor Requirements and Oversight**

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

See Appendix H: PPGH General, Section N

### **Employee Training**

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

See Appendix H: PPGH General, Section M

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

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

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

## Total Maximum Daily Load Implementation Plan

[Appendix I-adw\\_tmdl\\_plan\\_2019\\_final egle.pdf - 01/02/2020 11:22 AM](#)

[WBSD-ADW-TMDL-MS4-Plan-Priority-Action-Table \(1\).pdf - 02/11/2020 07:50 AM](#)

### Comment

See Appendix I

#### CORRECTION REQUEST (APPROVED)

##### Upload most recent TMDL.

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

Created on 10/28/2019 12:57 PM by Erica Volansky

#### NOTE (CREATED)

##### APPROVED

Created on 2/9/2021 5:02 PM by Erica Volansky

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

Yes

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

See Appendix I: Section I. TMDL AND MS4 COVERAGE- Detroit River-TMDL for E.coli, Wayne, Oakland, and Washtenaw Counties

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

See Appendix I: Section II. PRIORITIZING AND IMPLEMENTATION BMPS

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

See Appendix I: SWMP Priority Actions for TMDL Progress

#### CORRECTION REQUEST (APPROVED)

##### Provide the list of BMPs implemented.

The ADW TMDL should have a BMP table for the school district's use. The table prioritizes the BMPs over the whole watershed area but the school district needs to indicate how they intend to prioritize the BMPs. Please complete and upload.

Created on 2/6/2020 4:51 PM by Erica Volansky

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

See Appendix I: Section III Monitoring Plan

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

## Industrial Facility Inspection Program Procedures

NONE PROVIDED

### Comment

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

NONE PROVIDED

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

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

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

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

NONE PROVIDED

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

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

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

NONE PROVIDED

## Section 13. Certify and Submit

### Comments (As needed)

NONE PROVIDED

### Additional Documents (As needed)

NONE PROVIDED

#### Comment

NONE PROVIDED

## Attachments

Date	Attachment Name	Context	User
2/11/2020 7:50 AM	WBSD-ADW-TMDL-MS4-Plan-Priority-Action-Table (1).pdf	Attachment	Brent Florek
1/8/2020 10:42 AM	Spill Prevention Training.pdf	Attachment	Brent Florek
1/8/2020 10:41 AM	Envimmental Awareness Training.pdf	Attachment	Brent Florek
1/8/2020 10:41 AM	Support Services Building SWPPP SPCC PIPP.pdf	Attachment	Brent Florek
1/8/2020 10:40 AM	Appendix H PPGH_GENERAL_1of3 WBSD.pdf	Attachment	Brent Florek
1/7/2020 1:54 PM	Illicit Discharge Elimination Policy - memo - 2020.01.07.pdf	Attachment	Brent Florek
1/3/2020 9:17 AM	WBSD MS4 Inspection and Maintenance Field Sheets.pdf	Attachment	Brent Florek
1/2/2020 11:22 AM	Appendix I -adw_tmdl_plan_2019_final egle.pdf	Attachment	Brent Florek
1/2/2020 10:19 AM	Appendix F-Part91 WBSD.pdf	Attachment	Brent Florek
1/2/2020 10:16 AM	Appendix H PPGH_3of3 WBSD.pdf	Attachment	Brent Florek
1/2/2020 9:54 AM	Appendix E -ADW_Collaborative_IDEP_approved Feb 2019.pdf	Attachment	Brent Florek
1/2/2020 9:52 AM	Appendix D-ADW_PEP_04192019_approved(1).pdf	Attachment	Brent Florek
10/28/2019 11:26 AM	Permit by Rule deq-wrd-stormwater-construction-NPTDguidance_453910_7.pdf	Correction Request	Erica Volansky
10/22/2019 3:47 PM	EXAMPLE Board Resolution.pdf	Correction Request	Erica Volansky
10/22/2019 3:47 PM	EXAMPLE IDEP Regulatory Mechanism.pdf	Correction Request	Erica Volansky
10/22/2019 1:52 PM	wrd-storm-MS4-IDEP-ComplianceAssistance_473378_7.pdf	Correction Request	Erica Volansky
3/30/2017 5:30 PM	WBSD Vehicle Fueling Procedure.pdf	Attachment	Brent Florek
3/30/2017 5:29 PM	Appendix H Inventory 2of 3.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Existing -Storm_Water_Ordinance06.pdf.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Existing Controls _Storm Water Resolution.pdf	Attachment	Brent Florek
3/30/2017 11:20 AM	Appendix G _POSTCONSTRUCTION_ WBSD.pdf	Attachment	Brent Florek
3/25/2017 12:01 PM	APPENDIX B ERP_ WBSD.pdf	Attachment	Brent Florek

Date	Attachment Name	Context	User
3/25/2017 11:33 AM	Appendix A Outfall Table WBSD.pdf	Attachment	Brent Florek
3/13/2017 1:26 PM	APPENDIX C Public Participation Program WBSD.pdf	Attachment	Brent Florek

## Status History

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	User	Processing Status
2/11/2020 7:48:45 AM	Brent Florek	Draft
1/11/2021 1:16:17 PM	Michael Belcher	Submitted
7/30/2021 4:56:10 PM	Kathryn Gallagher	Complete

## Audit

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Event	Event Description	Event By	Event Date
Submission Locked	Submission Locked	Erica Volansky	10/22/2019 12:48 PM
Submission Unlocked	Submission Unlocked	Erica Volansky	10/29/2019 11:44 AM

## Revisions

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Revision	Revision Date	Revision By
Revision 1	3/13/2017 1:06 PM	Brent Florek
Revision 2	1/2/2020 9:06 AM	Brent Florek
Revision 3	2/11/2020 7:48 AM	Brent Florek

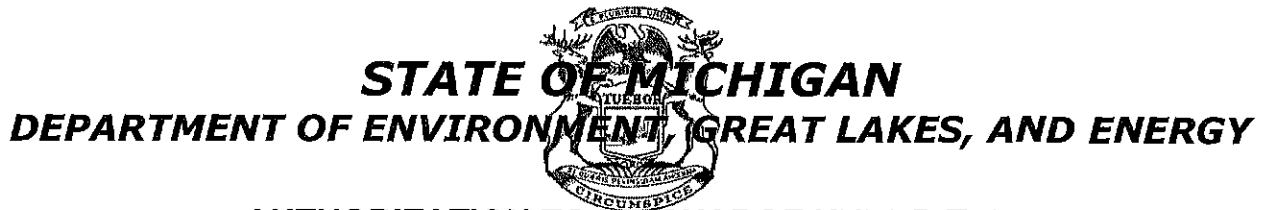
**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**B**

NPDES Permit

PERMIT NO. MI0060064



**AUTHORIZATION TO DISCHARGE UNDER THE  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

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

**Woodhaven-Brownstown School District**  
24975 Van Horn Road  
Flat Rock, MI 48134

is authorized to discharge from the Municipal Separate Storm Sewer System (MS4)

designated as **Woodhvn-Brownstwn PS MS4-Wayne**

to surface waters of the state of Michigan in accordance with effluent limitations, monitoring requirements, and other conditions set forth in this permit.

**This permit takes effect on August 1, 2021.** This permit is based on a complete application submitted on March 11, 2008, as amended through January 11, 2021.

The provisions of this permit are severable. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term in accordance with applicable laws and rules. On its effective date this permit shall supersede Certificate of Coverage No. MIG610359, issued on December 19, 2003, which is hereby revoked upon the effective date of this permit.

This permit and the authorization to discharge shall expire at midnight, **October 1, 2024**. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit an application which contains such information, forms, and fees as are required by the Department of Environment, Great Lakes, and Energy (Department) by **April 4, 2024**.

**Issued:** July 30, 2021.

Original signed by Christine Alexander  
Christine Alexander, Manager  
Permits Section  
Water Resources Division



## PERMIT FEE REQUIREMENTS

In accordance with Section 324.3118 of the NREPA, the permittee shall make payment of an annual storm water fee to the Department for each January 1 the permit is in effect regardless of occurrence of discharge. The permittee shall submit the fee in response to the Department's annual notice. Payment may be made electronically via the Department's MiWaters system. The MiWaters website is located at <https://miwaters.deq.state.mi.us>. Payment shall be submitted or postmarked by March 15 for notices mailed by February 1. Payment shall be submitted or postmarked no later than 45 days after receiving the notice for notices mailed after February 1.

**Annual Permit Fee Classification:** Municipal Storm Water – Institution

## CONTACT INFORMATION

Unless specified otherwise, all contact with the Department required by this permit shall be made to the Warren District Office of the Water Resources Division. The Warren District Office is located at 27700 Donald Court, Warren, MI 48092-2793, Telephone: 586-753-3700, Fax: 586-751-4690.

## CONTESTED CASE INFORMATION

Any person who is aggrieved by this permit may file a sworn petition with the Michigan Administrative Hearing System within the Michigan Department of Licensing and Regulatory Affairs, c/o the Michigan Department of Environment, Great Lakes, and Energy, setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Department of Licensing and Regulatory Affairs may reject any petition filed more than 60 days after issuance as being untimely.

**PART I****Section A. Limitations and Monitoring Requirements****1. Authorized Discharges****a. Authorized Outfalls and Points of Discharge**

This permit authorizes the discharge of storm water from the permittee's MS4 to the surface waters of the state via the outfalls and points of discharge identified in the permittee's application and as modified in accordance with this permit. Such discharges shall be controlled and monitored by the permittee in accordance with this permit.

**b. Nested MS4 Discharges**

This permit authorizes the discharge of storm water to surface waters of the state from a nested MS4 owned or operated by public bodies that include, but are not limited to, public school districts; public universities; airports; or county, state, or federal agencies. The permittee may request to modify permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.

**c. Discharges Authorized Under Other National Pollutant Discharge Elimination System (NPDES) Permits**

This permit does not prohibit the use of an MS4 for other discharges authorized under other NPDES permits, or equivalent Department approval under the NREPA or the Federal Act.

**d. Water Quality Requirements**

Discharges from the permittee's MS4 shall not cause or contribute to an exceedance of water quality standards in the receiving waters. This includes, but is not limited to, the requirement set forth in R 323.1050 of the Water Quality Standards stating that the receiving waters shall not have any of the following unnatural physical properties as a result of the discharge, in quantities which are or may become injurious to any designated use: turbidity, color, oil films, floating solids, foams, settleable solids, suspended solids, or deposits.

**2. Outfall or Point of Discharge Identified, Constructed, or Installed After Permit Issuance****a. Outfall or Point of Discharge Within the Permittee's Regulated Area**

Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located within the permittee's regulated area as identified in the application. For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:

- 1) whether the discharge is from an outfall or point of discharge;
- 2) the outfall or point of discharge identification number assigned by the permittee;
- 3) the surface water of the state receiving the discharge from the outfall or point of discharge;
- 4) a certification statement that the outfall or point of discharge is within the permittee's regulated area as identified in the application;
- 5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes best management practices (BMPs) to comply with the minimum requirements of the permit for the outfall or point of discharge; and

**PART I****Section A. Limitations and Monitoring Requirements**

- 6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map required in Part I.A.3.d.1) of this permit.
- b. **Outfall or Point of Discharge Outside the Permittee's Regulated Area**  
Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located outside the permittee's regulated area as identified in the application (e.g., area served by an expanded MS4 or area previously served by a combined sewer system that is now separated). For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:
  - 1) whether the discharge is from an outfall or point of discharge;
  - 2) the outfall or point of discharge identification number assigned by the permittee;
  - 3) the surface water of the state receiving the discharge from the outfall or point of discharge;
  - 4) a map identifying the expanded regulated area served by the permittee's MS4;
  - 5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes BMPs to comply with the minimum requirements of the permit for the outfall or point of discharge and expanded regulated area; and
  - 6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the expanded regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map as required in Part I.A.3.d.1) of this permit.
- c. Upon review of the request to authorize the discharge from an outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit in accordance with Part I.A.2.a. or Part I.A.2.b. of this permit, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required.

**3. Storm Water Management Program (SWMP)**

The permittee submitted a SWMP with its application for an NPDES permit. The SWMP is approved as submitted. The permittee shall implement the approved SWMP to comply with the minimum requirements identified in this permit. The SWMP shall cover the regulated area served by, or otherwise contributing to discharges from, the MS4 owned or operated by the permittee identified in the application. The permittee shall implement and enforce the SWMP to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the NREPA and the Federal Act. The approved SWMP is an enforceable part of this permit and any Department approved modifications made to the SWMP shall also become enforceable parts of this permit.

- a. **Enforcement Response Procedure (ERP)**  
The permittee shall implement the ERP for violations of the permittee's ordinances or regulatory mechanisms identified in the SWMP to the maximum extent practicable. The ERP shall be implemented to compel compliance with the permittee's ordinances and/or regulatory mechanisms and to deter continuing violations.

**PART I****Section A. Limitations and Monitoring Requirements**

The permittee shall track and document all enforcement conducted pursuant to the permittee's ERP. At a minimum, the permittee shall track and document the following: the name of the person responsible for violating the permittee's ordinance or regulatory mechanism; the date and location of the violation; a description of the violation; a description of the enforcement response used; a schedule for returning to compliance; and the date the violation was resolved.

b. **Public Participation/Involvement Program (PPP)**

The permittee shall implement the PPP to encourage public participation/involvement in the implementation and periodic review of the SWMP to the maximum extent practicable. The permittee shall implement the PPP as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PPP or part of the PPP, therefore each permittee working collaboratively is responsible for complying with the PPP as described in the SWMP.

The PPP requires implementation of the following minimum requirements:

- 1) The procedure for making the SWMP available for public inspection and comment, including complying with local public notice requirements, as appropriate; and
- 2) The procedure for inviting public participation and involvement in the implementation and periodic review of the SWMP.

c. **Public Education Program (PEP)**

The permittee shall implement the PEP as part of the SWMP to the maximum extent practicable. At the minimum, the PEP shall promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water runoff. The PEP shall be implemented to achieve measurable improvements in the public's understanding of storm water pollution and efforts to reduce the impacts of storm water pollution. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PEP or part of the PEP, therefore each permittee working collaboratively is responsible for complying with the PEP as described in the SWMP.

The permittee shall implement the PEP in accordance with the procedure for prioritizing the following PEP topics based on high-priority, community-wide issues and targeted issues to reduce pollutant loads to storm water to the maximum extent practicable.

The PEP requires implementation of the following minimum requirements:

- 1) BMPs to address the following PEP topics:
  - (a) Promote public responsibility and stewardship in the permittee's watershed.
  - (b) Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges can have on surface waters of the state.
  - (c) Educate the public on illicit discharges and promote public reporting on illicit discharges and improper disposal of materials into the MS4.
  - (d) Promote preferred cleaning materials and procedures for car, pavement, and power washing.
  - (e) Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.
  - (f) Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.

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- (g) Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids.
- (h) Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.
- (i) Educate the public on, and promote the benefits of, green infrastructure and Low Impact Development.
- (j) Promote methods for managing riparian lands to protect water quality.
- (k) Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to storm water runoff.

2) The procedure for determining the overall effectiveness of implementation and the process for modifying the PEP to address ineffective implementation. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the PEP. The Department will notify the permittee if a modification is required.

d. **Illicit Discharge Elimination Program (IDEP)**

The permittee shall implement and enforce the IDEP to detect and eliminate illicit discharges and connections to the permittee's MS4. The permittee shall implement the IDEP as part of the SWMP to the maximum extent practicable. The permittee has chosen to work collaboratively with watershed or regional partners to implement the IDEP or part of the IDEP, therefore each permittee working collaboratively is responsible for complying with the IDEP as described in the SWMP.

The IDEP requires implementation of the following minimum requirements:

1) An available, up-to-date storm sewer system map identifying the following: the storm sewer system, location of all outfalls and points of discharge the permittee owns or operates in the regulated area, and the names and location of all surface waters of the state that receive discharges from the permittee's MS4. The map shall be retained by the permittee and made available to the Department upon request. The map shall be maintained and updated as outfalls and points of discharge are identified, constructed, and installed in accordance with Part I.A.2. of this permit.

2) The plan to detect and eliminate non-storm water discharges to the permittee's MS4, including illegal dumping/spills. The plan includes the following:

- a) A procedure for identifying priority areas for field observations. The permittee shall conduct field observations in accordance with the procedure identifying the priority area(s) developed as part of the IDEP.
- b) A procedure for conducting field observations, field screening, and source investigations. The permittee shall conduct a field observation in accordance with the procedure during dry-weather at least once during the term of the permit. Field screening and source investigation shall be conducted in accordance with the schedule in the procedure.

Field observations, field screening, and source investigations shall include the following:

- (1) **Field Observation** – The permittee shall observe the outfall or point of discharge for the following during dry-weather in accordance with the procedure: presence/absence of flow, water clarity, color, odor, floatable materials, deposits/stains on the discharge structure and bank, vegetation condition, structural condition, and biology (e.g. bacterial sheens, algae, and slimes).

**PART I****Section A. Limitations and Monitoring Requirements**

(2) Field Screening – If flow is observed at an outfall or point of discharge, the permittee shall analyze the flow for the indicator parameters identified in the procedure. If the source of an illicit discharge is identified during the field observation, field screening may not be necessary.

(3) Source Investigation – If the source of the illicit discharge was not identified by the field screening, the permittee shall conduct an investigation to identify the source in accordance with the procedure. If the permittee opts to use tracer dyes, the discharge of the dyes shall be authorized in accordance with Part I.A.6. of this permit.

If the permittee is made aware of non-storm water discharges outside the priority areas, illegal dumping/spills, or complaints received, the permittee shall conduct field observations and follow-up field screening and source investigations as appropriate in accordance with the procedure, including the schedule, in the IDEP. The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state in accordance with Part II.C.7. of this permit.

- c) A procedure for responding to illicit discharges and pursuing enforcement action. The permittee shall implement the procedure to respond and pursue enforcement action once the source of the illicit discharge is identified, including the corrective action required to eliminate the illicit discharge. The permittee shall also implement the procedure to respond to illegal spills/dumping. For each illicit discharge not eliminated within 90 days of its discovery, the permittee shall provide, with the next progress report due, a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.

- 3) The employee training program, which includes the following:

- a) Training on techniques for identifying illicit discharges and connections, including field observations, field screening, and source investigations;
- b) Training on procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response; and
- c) A schedule and requirement for training at least once during the term of the permit for existing staff and within the first year of hire for new staff.

- 4) The procedure for IDEP evaluation and determining the overall effectiveness of the IDEP.

e. Construction Storm Water Runoff Control Program

The permittee shall implement the construction storm water runoff control program to address areas of construction activity that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale. The permittee shall implement the construction storm water runoff control program as part of the SWMP to the maximum extent practicable.

The construction storm water runoff control program requires implementation of the following minimum requirements:

- 1) The procedure to notify the Part 91 Agency, or appropriate staff (if the permittee is a Part 91 Agency), when soil or sediment is discharged to the permittee's MS4 from a construction activity.
- 2) The procedure to notify the Department when soil, sediment, or other pollutants are discharged to the permittee's MS4 from a construction activity.

**PART I****Section A. Limitations and Monitoring Requirements**

3) The procedure for ensuring that construction activity one (1) acre or greater in total earth disturbance with the potential to discharge to the permittee's MS4 obtains a Part 91 permit or is conducted by an approved Authorized Public Agency, as appropriate.

4) The procedure to advise the landowner or recorded easement holder of the State of Michigan Permit by Rule (R 323.2190 of the Part 21 Rules promulgated pursuant to Part 31 of the NREPA).

f. **Post-Construction Storm Water Runoff Program**

The permittee shall implement and enforce the program to address post-construction storm water runoff from new development and redevelopment projects that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale, and that discharge into the permittee's MS4. The permittee shall implement and enforce the post-construction storm water control program as part of the SWMP, to the maximum extent practicable and in accordance with the approved ordinance or regulatory mechanism.

1) On or before September 1, 2021, the permittee shall submit to the Department for review a draft Post-Construction Storm Water Control regulatory mechanism. On or before December 1, 2021, the permittee shall submit to the Department for approval an in-effect Post-Construction Storm Water Control regulatory mechanism to achieve the post-construction storm water runoff performance standards set forth in a) and b) below at the project site (including projects where the permittee is the project developer). Upon Department approval of the ordinance, the permittee shall implement and enforce the ordinance requiring implementation of BMPs by the project developer (including the permittee if the permittee is the project developer) to achieve the post-construction storm water runoff performance standards at the project site to the maximum extent practicable.

a) **Water Quality Control (WQC) Performance Standard**

Treat the post-development runoff volume generated from a 1.0-inch rainfall event. BMPs shall be designed on a site-specific basis to achieve a minimum of 80 percent removal of total suspended solids (TSS) as compared with uncontrolled runoff or a discharge concentration of TSS not to exceed 80 milligrams per liter (mg/l).

b) **Channel Protection Control Performance Standard (CPC)**

The CPC shall be implemented to limit the surface runoff rate and volume at the project site to maintain or restore stable hydrology in receiving waters. An alternative CPC was approved as part of the SWMP. The alternative CPC requires implementation of the following at the project site to the maximum extent practicable:

- Channel Protection Volume Control (CPVC): Retain onsite the post-development runoff volume from a 1.0-inch rainfall event, and
- Channel Protection Rate Control (CPRC): Provide extended detention for the post-development runoff volume from a 1.9-inch rainfall event.

On or before April 1, 2022 and on or before April 1 of every year following, as part of the approved alternative, the permittee shall submit an annual report to the Department for the previous calendar year documenting the results of implementing the alternative CPC in the regulated area. The annual report shall tabulate the following for each development or redevelopment project (including projects where the permittee is the project developer) and provide an overall summary for each reporting line:

- (1) Change in impervious area, pervious area by cover type, and total area by site.
- (2) CPVC volume provided at the site.
- (3) Difference between required and provided CPVC volume by site.

**PART I****Section A. Limitations and Monitoring Requirements**

- (4) Percent of site in each Hydrologic Soil Group (Type A, B, C, D).
- (5) Site location in geographic information system (GIS) polygon format, or an approved alternative format.
- (6) Site outfalls and points of discharge in GIS point format, or an approved alternative format.
- (7) Site MS4 outfall drainage area in GIS polygon format, or an approved alternative format, including any offsite drainage that passes through the outfall or points of discharge.
- (8) CPRC volume provided at the site.
- (9) Difference between required and provided CPRC volume by site.
- (10) CPVC volume required for each primary road project with receiving water of the state identified.
- (11) Cumulative CPVC volume provided for all new development and redevelopment projects discharging to the same receiving water of the state with a road project(s) starting December 1, 2021.

The permittee shall submit documentation to support implementation of the alternative CPC upon request. The alternative CPC approval is limited to the permit term. The results from the annual reports will be evaluated as part of permit reissuance using methods agreed to by the permittee and Department, which may result in an updated alternative CPC.

- 2) The permittee shall implement and enforce the following site-specific requirements as part of meeting the post-construction storm water runoff performance standards set forth in a) and b), above:
  - a) The procedure for reviewing the use of infiltration BMPs to achieve the performance standards in areas of soil or groundwater contamination in a manner that does not exacerbate existing conditions.
  - b) The ordinance or regulatory mechanism requiring BMPs to address the associated pollutants in potential hot spots as part of meeting the performance standards. Hot spots include areas with the potential for significant pollutant loading including, but not limited to, the following: gas stations; vehicle maintenance and repair; auto recyclers; recycling centers and scrap yards; landfills; solid waste facilities; and railroads. Hot spots also include areas with the potential for contaminating public water supply intakes.
- 3) All structural and vegetative BMPs installed and implemented to meet the performance standards shall be operated and maintained in perpetuity. The permittee shall implement and enforce the ordinance or regulatory mechanism program to ensure long-term operation and maintenance of BMPs.
- 4) The ordinance or regulatory mechanism and procedures for site plan review and approval for projects that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale, and discharge to the permittee's MS4, including projects where the permittee is the developer. The site plan review and approval shall demonstrate compliance with the performance standards and long-term operation and maintenance requirements of this permit.



**PART I****Section A. Limitations and Monitoring Requirements****g. Pollution Prevention and Good Housekeeping Activities for Municipal Operations**

The permittee shall implement the pollution prevention and good housekeeping program with the goal of preventing or reducing pollutant runoff from municipal facilities and operations that discharge storm water to surface waters of the state. The permittee shall implement the program as part of the SWMP to the maximum extent practicable.

**1) Municipal Facility and Structural Storm Water Control Inventory**

The permittee shall make available to the Department upon request an up-to-date map or maps of the facilities and structural storm water controls owned or operated by the permittee with a discharge to surface waters of the state in the regulated area. In accordance with the procedure for updating and revising the permittee's facility inventory and map(s), the permittee shall submit to the Department the type and location for any new facility obtained or constructed during this permit term with a discharge of storm water to surface waters of the state and the information requested in Part I.A.2. of the permit.

**2) Facility-Specific Storm Water Management**

The permittee shall implement the facility-specific standard operating procedure (SOP) for each facility the permittee identified as having the high potential to discharge pollutants to surface waters of the state. The permittee shall implement the BMPs identified in the procedure to prevent or reduce pollutant runoff at each facility the permittee identified as having the medium or low potential to discharge pollutants to surface waters of the state. The permittee shall assess new facilities for the potential to discharge pollutants to surface waters of the state in accordance with the procedure to determine a priority level. High-priority facilities shall include permittee-owned or operated fleet maintenance and storage yards unless a demonstration is submitted and approved by the Department demonstrating how the permittee's fleet maintenance or storage yard has the low potential to discharge pollutants to surface waters of the state. The assessment shall be submitted in writing to the Department for approval within 30 days of ownership or operation of the new facility. The permittee shall certify in writing to the Department that a facility-specific SOP is being implemented within 90 days of ownership or operation of a new high-priority facility. Within 90 days of ownership or operation, the permittee shall certify in writing to the Department that BMPs are being implemented in accordance with the procedure developed to prevent or reduce pollutant runoff at each new medium- or low-priority facility. For new facilities, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required. The permittee shall document all other changes to the facility assessment as part of the progress report and as an update to the procedure.

The facility-specific SOP shall be kept at the site described in the SOP and made available upon request by the Department. The facility-specific SOP for each high-priority facility shall include implementation of the following.

- a) Structural and non-structural storm water controls to prevent or reduce the discharge of pollutants to surface waters of the state.
- b) Up-to-date list of significant materials stored on-site that could pollute storm water with a description of the handling and storage requirements and potential to discharge for each significant material.
- c) Good housekeeping practices including, but not limited to, maintaining a clean and orderly facility, properly storing and covering materials, and minimizing pollutant sources to prevent or reduce pollutant runoff.
- d) Routine maintenance and inspections of storm water management and control devices to ensure materials and equipment are clean and orderly and prevent or reduce pollutant runoff. The written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.

**PART I****Section A. Limitations and Monitoring Requirements**

- e) Comprehensive site inspections at least once every six (6) months. The comprehensive site inspection shall include an inspection of all structural storm water controls and a review of non-structural storm water controls to prevent or reduce pollutant runoff. A written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.
- 3) **Structural Storm Water Control Operation and Maintenance Activities**
- a) The permittee shall implement the procedures for inspecting, cleaning, and maintaining permittee-owned or operated catch basins in the regulated area using the priority level assigned to each catch basin. The permittee shall document changes to the priority level for a catch basin as part of the progress report and as an update to the procedure.  
  
The permittee shall also implement the procedure for dewatering and disposal of materials extracted from the catch basins in accordance with Part 111 (Hazardous Waste), Part 115 (Solid Waste), and Part 121 (Liquid Industrial Waste) of the NREPA.
  - b) The permittee shall implement the procedure for inspecting and maintaining permittee-owned or operated structural storm water controls other than catch basins in the regulated area. The permittee shall document changes to the procedure as part of the progress report and as an update to the procedure.
  - c) The permittee shall implement the procedure requiring that new permittee-owned or operated facilities or structural storm water controls to address water quantity be designed and implemented in accordance with the post-construction storm water runoff performance standards and long-term operation and maintenance requirements in Part I.A.3.f. of this permit.
- 4) **Municipal Operations and Maintenance Activities**
- a) The permittee shall implement the procedure, including the BMPs identified, to prevent or reduce pollutant runoff from the permittee's operation and maintenance activities identified in the SWMP. The permittee shall document changes to the assessment of operation and maintenance activities for the potential to discharge pollutants to surface waters of the state as part of the progress report and as an update to the procedure.
  - b) The permittee shall implement the procedure for the street sweeping program for permittee-owned or operated streets, parking lots, or other impervious infrastructure in the regulated area using the sweeping methods and assigned priority levels identified in the procedure. The permittee shall document changes to the priority level for a street, parking lot, or other impervious infrastructure as part of the progress report and as an update to the procedure.  
  
The permittee shall also implement the procedure for dewatering and disposal of street sweeper waste material.
- 5) **Managing Vegetated Properties**  
The permittee shall implement the procedure requiring the permittee's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land.
- 6) **Employee Training**  
The permittee shall implement the employee training program to train employees involved in implementing pollution prevention and good housekeeping activities. At a minimum, existing staff shall be trained once during the permit cycle and new hire employees within the first year of their hire date.

**PART I****Section A. Limitations and Monitoring Requirements****7) Contractor Requirements and Oversight**

The permittee shall implement the procedure requiring contractors hired by the permittee to perform municipal operation and maintenance activities that comply with the permittee's pollution prevention and good housekeeping program and contractor oversight to ensure compliance.

**h. Total Maximum Daily Load (TMDL) Implementation Plan**

The permittee shall implement the TMDL Implementation Plan to reduce the discharge of pollutants from the permittee's MS4 to make progress in meeting Water Quality Standards. The permittee shall implement the TMDL Implementation Plan as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement this plan or part of the plan, therefore each permittee is responsible for complying with the plan as described in the SWMP.

The following TMDL is applicable to the discharge from the permittee's MS4:

<u>Name of TMDL</u>	<u>Pollutant of Concern</u>
Detroit River	<i>E. coli</i>

The permittee shall implement the prioritized BMPs included in the TMDL Implementation Plan during the permit cycle to make progress in achieving the pollutant load reduction requirement in the TMDL. The permittee shall review, update, and revise the list of BMPs implemented as part of the TMDL Implementation Plan in accordance with the procedure included in the SWMP. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the TMDL Implementation Plan. The Department will notify the permittee if a modification is required.

The permittee shall implement the monitoring plan included in the TMDL Implementation Plan for assessing the effectiveness of the BMPs implemented in making progress toward achieving the TMDL pollutant load reduction. Available monitoring data shall be submitted with each progress report.

**4. SWMP Modifications****a. SWMP Modifications Requested by the Permittee**

Modifications to the previously approved SWMP may be requested by the permittee as follows:

1) Modifications adding BMPs (but not replacing, subtracting, or affecting the level of implementation of any other BMP) to the previously approved SWMP may be made by the permittee at any time upon written notification to the Department. Notification shall include a description of the modification, which may include a description of a new BMP with a corresponding measurable goal. Upon notification to the Department, the modification is considered an enforceable part of the approved SWMP.

2) Modifications replacing an ineffective or unfeasible BMP identified in the previously approved SWMP with an alternative BMP may be requested at any time by written notification to the Department. The ineffective or unfeasible BMP identified shall not be replaced in the previously approved SWMP unless the replacement is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:

- a) an analysis of why the BMP is ineffective or unfeasible (including cost-prohibitive);
- b) a measurable goal for the replacement BMP; and
- c) an analysis of why the replacement BMP is expected to achieve the intent of the BMP to be replaced.

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- 3) Modifications subtracting an ineffective or unfeasible BMP identified in the previously approved SWMP may be requested by written notification to the Department. The identified BMP shall not be subtracted from the previously approved SWMP unless the subtraction is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:
- a) an analysis of why the BMP is ineffective or unfeasible (including cost prohibitive); and
  - b) a determination of why the removal of the BMP will not change the permittee's ability to comply with the permit requirements.
- b. Modifications Required by the Department  
The Department may require the permittee to modify the SWMP as needed to:
- 1) address contributions from the permittee's MS4 discharge that impair receiving water quality;
  - 2) include more stringent requirements necessary to comply with new state or federal statutory or regulatory requirements; and/or
  - 3) include such other conditions deemed necessary by the Department to comply with the goals and requirements of the Federal Act or the NREPA, including the requirement to reduce the discharge of pollutants from the MS4 to the maximum extent practicable.

**5. Request for Approval to Use Water Treatment Additives**

This permit does not authorize the use of any water treatment additive without prior written approval from the Department. Such approval is authorized under separate correspondence. Water treatment additives include any materials that are added to water used at the facility, or to wastewater generated by the facility, to condition or treat the water. Permittees proposing to use water treatment additives, including a proposed increased concentration of a previously approved water treatment additive, shall submit a request for approval via the Department's MiWaters system. The MiWaters website is located at <https://miwaters.deq.state.mi.us>. Instructions for submitting such a request may be obtained at <http://www.michigan.gov/eglenpdes> (near the bottom of that page, click on one or both of the links located under the Water Treatment Additives banner). Additional monitoring and reporting may be required as a condition of approval to use the water treatment additive.

A request for approval to use water treatment additives shall include all of the following usage and discharge information for each water treatment additive proposed to be used:

- a. The Safety Data Sheet (SDS);
- b. Ingredient information, including the name of each ingredient, CAS number for each ingredient, and fractional content by weight for each ingredient;
- c. The proposed water treatment additive discharge concentration with supporting calculations;
- d. The discharge frequency (i.e., number of hours per day and number of days per year);
- e. The outfall(s) and monitoring point(s) from which the water treatment additive is to be discharged;
- f. The type of removal treatment, if any, that the water treatment additive receives prior to discharge;
- g. The water treatment additive's function (i.e., microbiocide, flocculant, etc.);

**PART I****Section A. Limitations and Monitoring Requirements**

- h. The SDS shall include a 48-hour LC50 or EC50 for a North American freshwater planktonic crustacean (either *Ceriodaphnia* sp., *Daphnia* sp., or *Simocephalus* sp.); The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated; and
- i. The SDS shall include the results of a toxicity test for one (1) other North American freshwater aquatic species (other than a planktonic crustacean) that meets a minimum requirement of R 323.1057(2) of the Water Quality Standards. The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated. Examples of tests that would meet this requirement include a 96-hour LC50 for rainbow trout, bluegill, or fathead minnow.

**6. Tracer Dye Discharges**

This permit does not authorize the discharge of tracer dyes without approval from the Department. Requests to discharge tracer dyes shall be submitted to the Department in accordance with Rule 1097 (R 323.1097 of the Michigan Administrative Code).

**7. Storm Water Program Manager (Facility Contact)**

The "Facility Contact" was specified in the application. The permittee may replace the facility contact at any time, and shall notify the Department in writing within 10 days after replacement (including the name, address and telephone number of the new facility contact).

- a. The facility contact shall be (or a duly authorized representative of this person):
  - for a corporation, a principal executive officer of at least the level of vice president; or a designated representative if the representative is responsible for the overall operation of the facility from which the discharge originates, as described in the permit application or other NPDES form,
  - for a partnership, a general partner,
  - for a sole proprietorship, the proprietor, or
  - for a municipal, state, or other public facility, either a principal executive officer, the mayor, village president, city or village manager or other duly authorized employee.
- b. A person is a duly authorized representative only if:
  - the authorization is made in writing to the Department by a person described in paragraph a. of this section; and
  - the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the facility (a duly authorized representative may thus be either a named individual or any individual occupying a named position).

Nothing in this section obviates the permittee from properly submitting reports and forms as required by law.

**PART I****Section B. Program Assessment and Reporting****1. Progress Reports**

Progress reports shall be submitted on or before November 1, 2021, April 1, 2023, and on or before April 1 every two (2) years following. The Department may approve alternate dates for progress report submittal if requested and adequately justified by the permittee. Each progress report shall contain the following information for the entire period that has elapsed since the last progress report submittal (i.e., the reporting cycle):

- a. **Compliance Assessment**  
The permittee shall describe the status of compliance with the approved SWMP identified in Part I.A.3 of this permit. The permittee shall assess and describe the appropriateness of the BMPs identified in the SWMP. The report shall describe the progress made towards achieving the identified measurable goals for each of the BMPs, and specific evaluation criteria as follows:
  - 1) For the PEP, provide a summary of the evaluation of the overall effectiveness of the PEP, using the evaluation methods described in the PEP.
  - 2) For the IDEP, provide a summary of the evaluation and determination of the overall effectiveness of the IDEP, using the evaluation methods described in the IDEP. For each illicit discharge that was not eliminated within 90 days of its discovery the permittee shall provide a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.
  - 3) If applicable, the permittee shall submit to the Department any new outfall or point of discharge information as required in Part I.A.2. of this permit.
  - 4) For the TMDL Implementation Plan, if monitoring data is available in accordance with the monitoring plan, provide an assessment of progress made toward achieving the TMDL pollutant load reduction requirement.
- b. **Data and Results**  
The permittee shall provide a summary of all of the information collected and analyzed, including monitoring data, if any, during the reporting cycle.
- c. **Upcoming Activities**  
The permittee shall provide a summary of the BMPs to be implemented during the next reporting cycle.
- d. **Changes to BMPs and Measurable Goals**  
The permittee shall describe any changes to BMPs or measurable goals in the approved SWMP. In accordance with the permit, these changes will be reviewed to determine if a permit modification is necessary. The Department will notify the permittee if a permit modification is required.
- e. **Notice of Changes in Nested Jurisdiction Agreements**  
The permittee shall identify any nested jurisdictions that enter into or terminate permit agreements with the permittee which were not identified in the SWMP. The permittee may request to modify the permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval in accordance with Part I.A.1.b. of this permit. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.
- f. **Required Signatures**  
All reports required by this permit, and other information requested by the Department, shall be signed by either a principal executive officer or ranking elected official, or by a duly authorized representative of that person in accordance with 40 CFR 122.22(b).

## PART II

Part II may include terms and /or conditions not applicable to discharges covered under this permit.

### Section A. Definitions

**Acute toxic unit (TU<sub>A</sub>)** means  $100/LC_{50}$  where the  $LC_{50}$  is determined from a whole effluent toxicity (WET) test which produces a result that is statistically or graphically estimated to be lethal to 50% of the test organisms.

**Annual monitoring frequency** refers to a calendar year beginning on January 1 and ending on December 31. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Authorized public agency** means a state, local, or county agency that is designated pursuant to the provisions of Section 9110 of Part 91, Soil and Sedimentation Control, of the NREPA, to implement soil erosion and sedimentation control requirements with regard to construction activities undertaken by that agency.

**Best management practices (BMPs)** means structural devices or nonstructural practices that are designed to prevent pollutants from entering into storm water, to direct the flow of storm water, or to treat polluted storm water.

**Bioaccumulative chemical of concern (BCC)** means a chemical which, upon entering the surface waters, by itself or as its toxic transformation product, accumulates in aquatic organisms by a human health bioaccumulation factor of more than 1000 after considering metabolism and other physiochemical properties that might enhance or inhibit bioaccumulation. The human health bioaccumulation factor shall be derived according to R 323.1057(5). Chemicals with half-lives of less than 8 weeks in the water column, sediment, and biota are not BCCs. The minimum bioaccumulation concentration factor (BAF) information needed to define an organic chemical as a BCC is either a field-measured BAF or a BAF derived using the biota-sediment accumulation factor (BSAF) methodology. The minimum BAF information needed to define an inorganic chemical as a BCC, including an organometal, is either a field-measured BAF or a laboratory-measured bioconcentration factor (BCF). The BCCs to which these rules apply are identified in Table 5 of R 323.1057 of the Water Quality Standards.

**Biosolids** are the solid, semisolid, or liquid residues generated during the treatment of sanitary sewage or domestic sewage in a treatment works. This includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes and a derivative of the removed scum or solids.

**Bulk biosolids** means biosolids that are not sold or given away in a bag or other container for application to a lawn or home garden.

**CAFO** means concentrated animal feeding operation.

**Certificate of Coverage (COC)** is a document, issued by the Department, which authorizes a discharge under a general permit.

**Chronic toxic unit (TU<sub>C</sub>)** means  $100/MATC$  or  $100/IC_{25}$ , where the maximum acceptable toxicant concentration (MATC) and  $IC_{25}$  are expressed as a percent effluent in the test medium.

**Class B biosolids** refers to material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PSRP) in accordance with the Part 24 Rules, Land Application of Biosolids, promulgated under Part 31 of the NREPA. Processes include aerobic digestion, composting, anaerobic digestion, lime stabilization and air drying.

**Combined sewer system** is a sewer system in which storm water runoff is combined with sanitary wastes.

**Composite sample** is a sample collected over time, either by continuous sampling or by mixing discrete samples. A composite sample represents the average wastewater characteristics during the compositing period. Various methods for compositing are available and are based on either time or flow-proportioning, the choice of which will depend on the permit requirements.

## PART II

### Section A. Definitions

**Continuous monitoring** refers to sampling/readings that occur at regular and consistent intervals throughout a 24-hour period and at a frequency sufficient to capture data that are representative of the discharge. The maximum acceptable interval between samples/readings shall be one (1) hour.

**Daily concentration**

FOR PARAMETERS OTHER THAN pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – Daily concentration is the sum of the concentrations of the individual samples of a parameter taken within a calendar day divided by the number of samples taken within that calendar day. The daily concentration will be used to determine compliance with any maximum and minimum daily concentration limitations. For guidance and examples showing how to perform calculations using results below quantification levels, see the document entitled "Reporting Results Below Quantification," available at [https://www.michigan.gov/documents/deq/wrd-mpdes-results-quantification\\_620791\\_7.pdf](https://www.michigan.gov/documents/deq/wrd-mpdes-results-quantification_620791_7.pdf).

FOR pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – The daily concentration used to determine compliance with maximum daily pH, temperature, and conductivity limitations is the highest pH, temperature, and conductivity readings obtained within a calendar day. The daily concentration used to determine compliance with minimum daily pH and dissolved oxygen limitations is the lowest pH and dissolved oxygen readings obtained within a calendar day.

**Daily loading** is the total discharge by weight of a parameter discharged during any calendar day. This value is calculated by multiplying the daily concentration by the total daily flow and by the appropriate conversion factor. The daily loading will be used to determine compliance with any maximum daily loading limitations. When required by the permit, report the maximum calculated daily loading for the month in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMRs.

**Daily monitoring frequency** refers to a 24-hour day. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Department** means the Michigan Department of Environment, Great Lakes, and Energy.

**Detection level** means the lowest concentration or amount of the target analyte that can be determined to be different from zero by a single measurement at a stated level of probability.

**Discharge** means the addition of any waste, waste effluent, wastewater, pollutant, or any combination thereof to any surface water of the state.

**EC<sub>50</sub>** means a statistically or graphically estimated concentration that is expected to cause 1 or more specified effects in 50% of a group of organisms under specified conditions.

**Fecal coliform bacteria monthly**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a discharge event. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR. If the period in which the discharge event occurred was partially in each of two months, the calculated monthly value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a reporting month. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR.



## PART II

### Section A. Definitions

#### **Fecal coliform bacteria 7-day**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days of discharge during a discharge event. If the number of daily concentrations determined during the discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean value for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs. If the 7-day period was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days in a reporting month. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs. The first calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

**Flow-proportioned composite sample** is a composite sample in which either a) the volume of each portion of the composite is proportional to the effluent flow rate at the time that portion is obtained, or b) a constant sample volume is obtained at varying time intervals proportional to the effluent flow rate.

**General permit** means an NPDES permit authorizing a category of similar discharges.

**Geometric mean** is the average of the logarithmic values of a base 10 data set, converted back to a base 10 number.

**Grab sample** is a single sample taken at neither a set time nor flow.

**IC<sub>25</sub>** means the toxicant concentration that would cause a 25% reduction in a nonquantal biological measurement for the test population.

**Illicit connection** means a physical connection to a municipal separate storm sewer system that primarily conveys non-storm water discharges other than uncontaminated groundwater into the storm sewer; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

**Illicit discharge** means any discharge to, or seepage into, a municipal separate storm sewer system that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or litter; collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

**Individual permit** means a site-specific NPDES permit.

**Inlet** means a catch basin, roof drain, conduit, drain tile, retention pond riser pipe, sump pump, or other point where storm water or wastewater enters into a closed conveyance system prior to discharge off site or into waters of the state.

## PART II

### Section A. Definitions

**Interference** is a discharge which, alone or in conjunction with a discharge or discharges from other sources, both: 1) inhibits or disrupts a POTW, its treatment processes or operations, or its sludge processes, use or disposal; and 2) therefore, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or, of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including state regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act. [This definition does not apply to sample matrix interference].

**Land application** means spraying or spreading biosolids or a biosolids derivative onto the land surface, injecting below the land surface, or incorporating into the soil so that the biosolids or biosolids derivative can either condition the soil or fertilize crops or vegetation grown in the soil.

**LC<sub>50</sub>** means a statistically or graphically estimated concentration that is expected to be lethal to 50% of a group of organisms under specified conditions.

**Maximum acceptable toxicant concentration (MATC)** means the concentration obtained by calculating the geometric mean of the lower and upper chronic limits from a chronic test. A lower chronic limit is the highest tested concentration that did not cause the occurrence of a specific adverse effect. An upper chronic limit is the lowest tested concentration which did cause the occurrence of a specific adverse effect and above which all tested concentrations caused such an occurrence.

**Maximum extent practicable** means implementation of best management practices by a public body to comply with an approved storm water management program as required by a national permit for a municipal separate storm sewer system, in a manner that is environmentally beneficial, technically feasible, and within the public body's legal authority.

**MBTU/hr** means million British Thermal Units per hour.

**MGD** means million gallons per day.

**Monthly concentration** is the sum of the daily concentrations determined during a reporting period divided by the number of daily concentrations determined. The calculated monthly concentration will be used to determine compliance with any maximum monthly concentration limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly concentration in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR.

For minimum percent removal requirements, the monthly influent concentration and the monthly effluent concentration shall be determined. The calculated monthly percent removal, which is equal to 100 times the quantity [1 minus the quantity (monthly effluent concentration divided by the monthly influent concentration)], shall be reported in the "MINIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs.

**Monthly loading** is the sum of the daily loadings of a parameter divided by the number of daily loadings determined during a reporting period. The calculated monthly loading will be used to determine compliance with any maximum monthly loading limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly loading in the "AVERAGE" column under "QUANTITY OR LOADING" on the DMR.

**Monthly monitoring frequency** refers to a calendar month. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Municipal separate storm sewer** means a conveyance or system of conveyances designed or used for collecting or conveying storm water which is not a combined sewer and which is not part of a POTW as defined in the Code of Federal Regulations at 40 CFR 122.2.

**PART II****Section A. Definitions**

**Municipal separate storm sewer system (MS4)** means all separate storm sewers that are owned or operated by the United States, a state, city, village, township, county, district, association, or other public body created by or pursuant to state law, having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law, such as a sewer district, flood control district, or drainage district, or similar entity, or a designated or approved management agency under Section 208 of the Clean Water Act that discharges to the waters of the state. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

**National Pretreatment Standards** are the regulations promulgated by or to be promulgated by the Federal Environmental Protection Agency pursuant to Section 307(b) and (c) of the Clean Water Act. The standards establish nationwide limits for specific industrial categories for discharge to a POTW.

**No observed adverse effect level (NOAEL)** means the highest tested dose or concentration of a substance which results in no observed adverse effect in exposed test organisms where higher doses or concentrations result in an adverse effect.

**Noncontact cooling water** is water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product or finished product.

**Nondomestic user** is any discharger to a POTW that discharges wastes other than or in addition to water-carried wastes from toilet, kitchen, laundry, bathing or other facilities used for household purposes.

**Nonstructural controls** are practices or procedures implemented by employees at a facility to manage storm water or to prevent contamination of storm water.

**NPDES** means National Pollutant Discharge Elimination System.

**Outfall** is the location at which a point source discharge first enters a surface water of the state.

**Part 91 agency** means an agency that is designated by a county board of commissioners pursuant to the provisions of Section 9105 of Part 91 of the NREPA; an agency that is designated by a city, village, or township in accordance with the provisions of Section 9106 of Part 91 of the NREPA; or the Department for soil erosion and sedimentation control activities under Part 615, Supervisor of Wells; Part 631, Reclamation of Mining Lands; or Part 632, Nonferrous Metallic Mineral Mining, of the NREPA, pursuant to the provisions of Section 9115 of Part 91 of the NREPA.

**Part 91 permit** means a soil erosion and sedimentation control permit issued by a Part 91 agency pursuant to the provisions of Part 91 of the NREPA.

**Partially treated sewage** is any sewage, sewage and storm water, or sewage and wastewater, from domestic or industrial sources that is treated to a level less than that required by the permittee's NPDES permit, or that is not treated to national secondary treatment standards for wastewater, including discharges to surface waters from retention treatment facilities.

**Point of discharge** is the location of a point source discharge where storm water is discharged directly into a separate storm sewer system.

**Point source discharge** means a discharge from any discernible, confined, discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, or rolling stock. Changing the surface of land or establishing grading patterns on land will result in a point source discharge where the runoff from the site is ultimately discharged to waters of the state.

## PART II

### Section A. Definitions

**Polluting material** means any material, in solid or liquid form, identified as a polluting material under the Part 5 Rules, Spillage of Oil and Polluting Materials, promulgated under Part 31 of the NREPA (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

**POTW** is a publicly owned treatment work.

**Predevelopment** is the last land use prior to the planned new development or redevelopment.

**Pretreatment** is reducing the amount of pollutants, eliminating pollutants, or altering the nature of pollutant properties to a less harmful state prior to discharge into a public sewer. The reduction or alteration can be by physical, chemical, or biological processes, process changes, or by other means. Dilution is not considered pretreatment unless expressly authorized by an applicable National Pretreatment Standard for a particular industrial category.

**Public** (as used in the MS4 individual permit) means all persons who potentially could affect the authorized storm water discharges, including, but not limited to, residents, visitors to the area, public employees, businesses, industries, and construction contractors and developers.

**Public body** means the United States; the state of Michigan; a city, village, township, county, school district, public college or university, or single-purpose governmental agency; or any other body which is created by federal or state statute or law.

**Qualified Personnel** means an individual who meets qualifications acceptable to the Department and who is authorized by an Industrial Storm Water Certified Operator to collect the storm water sample.

**Qualifying storm event** means a storm event causing greater than 0.1 inch of rainfall and occurring at least 72 hours after the previous measurable storm event that also caused greater than 0.1 inch of rainfall. Upon request, the Department may approve an alternate definition meeting the condition of a qualifying storm event.

**Quantification level** means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.

**Quarterly monitoring frequency** refers to a three month period, defined as January through March, April through June, July through September, and October through December. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Regional Administrator** is the Region 5 Administrator, U.S. EPA, located at R-19J, 77 W. Jackson Blvd., Chicago, Illinois 60604.

**Regulated area** means the permittee's urbanized area, where urbanized area is defined as a place and its adjacent densely-populated territory that together have a minimum population of 50,000 people as defined by the United States Bureau of the Census and as determined by the latest available decennial census.

**Secondary containment structure** means a unit, other than the primary container, in which significant materials are packaged or held, which is required by state or federal law to prevent the escape of significant materials by gravity into sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface waters or groundwaters of the state.

**Separate storm sewer system** means a system of drainage, including, but not limited to, roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels, which is not a combined sewer where storm water mixes with sanitary wastes, and is not part of a POTW.

## PART II

### Section A. Definitions

**Significant industrial user** is a nondomestic user that: 1) is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; or 2) discharges an average of 25,000 gallons per day or more of process wastewater to a POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the permittee as defined in 40 CFR 403.12(a) on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's treatment plant operation or violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

**Significant materials** means any material which could degrade or impair water quality, including but not limited to: raw materials; fuels; solvents, detergents, and plastic pellets; finished materials such as metallic products; hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (see 40 CFR 372.65); any chemical the facility is required to report pursuant to Section 313 of Emergency Planning and Community Right-to-Know Act (EPCRA); polluting materials as identified under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code); Hazardous Wastes as defined in Part 111, Hazardous Waste Management, of the NREPA; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges.

**Significant spills and significant leaks** means any release of a polluting material reportable under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

**Special-use area** means storm water discharges for which the Department has determined that additional monitoring is needed from: secondary containment structures required by state or federal law; lands on Michigan's List of Sites of Environmental Contamination pursuant to Part 201, Environmental Remediation, of the NREPA; and/or areas with other activities that may contribute pollutants to the storm water.

**Stoichiometric** means the quantity of a reagent calculated to be necessary and sufficient for a given chemical reaction.

**Storm water** means storm water runoff, snow melt runoff, surface runoff and drainage, and non-storm water included under the conditions of this permit.

**Storm water discharge point** is the location where the point source discharge of storm water is directed to surface waters of the state or to a separate storm sewer. It includes the location of all point source discharges where storm water exits the facility, including *outfalls* which discharge directly to surface waters of the state, and *points of discharge* which discharge directly into separate storm sewer systems.

**Structural controls** are physical features or structures used at a facility to manage or treat storm water.

**SWPPP** means the Storm Water Pollution Prevention Plan prepared in accordance with this permit.

**Tier I value** means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier I toxicity database.

**Tier II value** means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier II toxicity database.

**Total maximum daily loads (TMDLs)** are required by the Clean Water Act for waterbodies that do not meet water quality standards. TMDLs represent the maximum daily load of a pollutant that a waterbody can assimilate and meet water quality standards, and an allocation of that load among point sources, nonpoint sources, and a margin of safety.

## PART II

### Section A. Definitions

**Toxicity reduction evaluation (TRE)** means a site-specific study conducted in a stepwise process designed to identify the causative agents of effluent toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in effluent toxicity.

**Water Quality Standards** means the Part 4 Water Quality Standards promulgated pursuant to Part 31 of the NREPA, being R 323.1041 through R 323.1117 of the Michigan Administrative Code.

**Weekly monitoring frequency** refers to a calendar week which begins on Sunday and ends on Saturday. When required by this permit, an analytical result, reading, value, or observation shall be reported for that period if a discharge occurs during that period. If the calendar week begins in one month and ends in the following month, the analytical result, reading, value, or observation shall be reported in the month in which monitoring was conducted.

**WWSL** is a wastewater stabilization lagoon.

**WWSL discharge event** is a discrete occurrence during which effluent is discharged to the surface water up to 10 days of a consecutive 14-day period.

**3-portion composite sample** is a sample consisting of three equal-volume grab samples collected at equal intervals over an 8-hour period.

#### **7-day concentration**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily concentrations determined. If the number of daily concentrations determined during the WWSL discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations. When required by the permit, report the maximum calculated 7-day concentration for the WWSL discharge event in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days in a reporting month divided by the number of daily concentrations determined. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations in the reporting month. When required by the permit, report the maximum calculated 7-day concentration for the month in the "MAXIMUM" column under "QUALITY OR CONCENTRATION" on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

**PART II****Section A. Definitions****7-day loading**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily loadings determined. If the number of daily loadings determined during the WWSL discharge event is less than 7 days, the number of actual daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations. When required by the permit, report the maximum calculated 7-day loading for the WWSL discharge event in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days in a reporting month divided by the number of daily loadings determined. If the number of daily loadings determined is less than 7, the actual number of daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations in the reporting month. When required by the permit, report the maximum calculated 7-day loading for the month in the "MAXIMUM" column under "QUANTITY OR LOADING" on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

**24-hour composite sample** is a flow-proportioned composite sample consisting of hourly or more frequent portions that are taken over a 24-hour period and in which the volume of each portion is proportional to the discharge flow rate at the time that portion is taken. A time-proportioned composite sample may be used upon approval from the Department if the permittee demonstrates it is representative of the discharge.

**PART II****Section B. Monitoring Procedures****1. Representative Samples**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

**2. Test Procedures**

Test procedures for the analysis of pollutants shall conform to regulations promulgated pursuant to Section 304(h) of the Clean Water Act (40 CFR Part 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants), unless specified otherwise in this permit. **Test procedures used shall be sufficiently sensitive to determine compliance with applicable effluent limitations.** For lists of approved test methods, go to <https://www.epa.gov/cwa-methods>. Requests to use test procedures not promulgated under 40 CFR Part 136 for pollutant monitoring required by this permit shall be made in accordance with the Alternate Test Procedures regulations specified in 40 CFR 136.4. These requests shall be submitted to the Manager of the Permits Section, Water Resources Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30458, Lansing, Michigan, 48909-7958. The permittee may use such procedures upon approval.

The permittee shall periodically calibrate and perform maintenance procedures on all analytical instrumentation at intervals to ensure accuracy of measurements. The calibration and maintenance shall be performed as part of the permittee's laboratory Quality Assurance/Quality Control program.

**3. Instrumentation**

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring instrumentation at intervals to ensure accuracy of measurements.

**4. Recording Results**

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information: 1) the exact place, date, and time of measurement or sampling; 2) the person(s) who performed the measurement or sample collection; 3) the dates the analyses were performed; 4) the person(s) who performed the analyses; 5) the analytical techniques or methods used; 6) the date of and person responsible for equipment calibration; and 7) the results of all required analyses.

**5. Records Retention**

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Department.



**PART II****Section C. Reporting Requirements****1. Start-Up Notification**

The permittee shall notify the Department of start-up if one of the following conditions applies and in accordance with the applicable condition:

**a. Non-CAFOs**

1) **If this is an individual permit** and the permittee will not discharge during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to commencement of the discharge.

2) **If this is a general permit** and the permittee will not discharge during the first 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to commencement of the discharge.

**b. CAFOs**

1) **If this is an individual permit** and the permittee will not populate with animals during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to populating with animals.

2) **If this is a general permit** and the permittee will not populate with animals during 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to populating with animals.

**2. Submittal Requirements for Self-Monitoring Data**

Part 31 of the NREPA (specifically Section 324.3110(7)); and R 323.2155(2) of Part 21, Wastewater Discharge Permits, promulgated under Part 31 of the NREPA, allow the Department to specify the forms to be utilized for reporting the required self-monitoring data. Unless instructed on the effluent limitations page to conduct "Retained Self-Monitoring," the permittee shall submit self-monitoring data via the Department's MiWaters system.

The permittee shall utilize the information provided on the MiWaters website, located at <https://miwaters.deq.state.mi.us>, to access and submit the electronic forms. Both monthly summary and daily data shall be submitted to the Department no later than the 20<sup>th</sup> day of the month following each month of the authorized discharge period(s). The permittee may be allowed to submit the electronic forms after this date if the Department has granted an extension to the submittal date.

## PART II

### Section C. Reporting Requirements

#### 3. Retained Self-Monitoring Requirements

If instructed on the effluent limits page (or otherwise authorized by the Department in accordance with the provisions of this permit) to conduct retained self-monitoring, the permittee shall maintain a year-to-date log of retained self-monitoring results and, upon request, provide such log for inspection to the staff of the Department. Retained self-monitoring results are public information and shall be promptly provided to the public upon request.

The permittee shall certify, in writing, to the Department, on or before January 10th (April 1st for animal feeding operation facilities) of each year, that: 1) all retained self-monitoring requirements have been complied with and a year-to-date log has been maintained; and 2) the application on which this permit is based still accurately describes the discharge. With this annual certification, the permittee shall submit a summary of the previous year's monitoring data. The summary shall include maximum values for samples to be reported as daily maximums and/or monthly maximums and minimum values for any daily minimum samples.

Retained self-monitoring may be denied to a permittee by notification in writing from the Department. In such cases, the permittee shall submit self-monitoring data in accordance with Part II.C.2., above. Such a denial may be rescinded by the Department upon written notification to the permittee. Reissuance or modification of this permit or reissuance or modification of an individual permittee's authorization to discharge shall not affect previous approval or denial for retained self-monitoring unless the Department provides notification in writing to the permittee.

#### 4. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report. Such increased frequency shall also be indicated.

Monitoring required pursuant to Part 41 of the NREPA or Rule 35 of the Mobile Home Park Commission Act, 1987 PA 96, as amended, for assurance of proper facility operation, shall be submitted as required by the Department.

#### 5. Compliance Dates Notification

Within 14 days of every compliance date specified in this permit, the permittee shall submit a written notification to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) indicating whether or not the particular requirement was accomplished. If the requirement was not accomplished, the notification shall include an explanation of the failure to accomplish the requirement, actions taken or planned by the permittee to correct the situation, and an estimate of when the requirement will be accomplished. If a written report is required to be submitted by a specified date and the permittee accomplishes this, a separate written notification is not required.

**PART II****Section C. Reporting Requirements****6. Noncompliance Notification**

Compliance with all applicable requirements set forth in the Clean Water Act, Parts 31 and 41 of the NREPA, and related regulations and rules is required. All instances of noncompliance shall be reported as follows:

- a. **24-Hour Reporting**  
Any noncompliance which may endanger health or the environment (including maximum and/or minimum daily concentration discharge limitation exceedances) shall be reported, verbally, within 24 hours from the time the permittee becomes aware of the noncompliance by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC). A written submission shall also be provided via MiWaters (<https://miwaters.deq.state.mi.us>) within five (5) days.
- b. **Other Reporting**  
The permittee shall report, in writing via MiWaters (<https://miwaters.deq.state.mi.us>), all other instances of noncompliance not described in a. above at the time monitoring reports are submitted; or, in the case of retained self-monitoring, within five (5) days from the time the permittee becomes aware of the noncompliance.

Reporting shall include: 1) a description of the discharge and cause of noncompliance; 2) the period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue; and 3) the steps taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

**7. Spill Notification**

The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state, unless the permittee has determined that the release is not in excess of the threshold reporting quantities specified in the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code), by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if the notice is provided after regular working hours, by calling the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

Within 10 days of the release, the permittee shall submit to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) a full written explanation as to the cause of the release, the discovery of the release, response measures (clean-up and/or recovery) taken, and preventive measures taken or a schedule for completion of measures to be taken to prevent reoccurrence of similar releases.

**PART II****Section C. Reporting Requirements****8. Upset Noncompliance Notification**

If a process "upset" (defined as an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee) has occurred, the permittee who wishes to establish the affirmative defense of upset shall notify the Department by telephone within 24 hours of becoming aware of such conditions; and within five (5) days, provide in writing, the following information:

- a. that an upset occurred and that the permittee can identify the specific cause(s) of the upset;
- b. that the permitted wastewater treatment facility was, at the time, being properly operated and maintained (note that an upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation); and
- c. that the permittee has specified and taken action on all responsible steps to minimize or correct any adverse impact in the environment resulting from noncompliance with this permit.

No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

In any enforcement proceedings, the permittee, seeking to establish the occurrence of an upset, has the burden of proof.

**9. Bypass Prohibition and Notification**

- a. **Bypass Prohibition**  
Bypass is prohibited, and the Department may take an enforcement action, unless:
  - 1) bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
  - 2) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass; and
  - 3) the permittee submitted notices as required under b. or c. below.
- b. **Notice of Anticipated Bypass**  
If the permittee knows in advance of the need for a bypass, the permittee shall submit written notification to the Department before the anticipated date of the bypass. This notification shall be submitted at least 10 days before the date of the bypass; however, the Department will accept fewer than 10 days advance notice if adequate explanation for this is provided. The notification shall provide information about the anticipated bypass as required by the Department. The Department may approve an anticipated bypass, after considering its adverse effects, if it will meet the three (3) conditions specified in a. above.
- c. **Notice of Unanticipated Bypass**  
As soon as possible but no later than 24 hours from the time the permittee becomes aware of the unanticipated bypass, the permittee shall notify the Department by calling the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if notification is provided after regular working hours, call the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

**PART II****Section C. Reporting Requirements****d. Written Report of Bypass**

A written submission shall be provided within five (5) working days of commencing any bypass to the Department, and at additional times as directed by the Department. The written submission shall contain a description of the bypass and its cause; the period of bypass, including exact dates and times, and if the bypass has not been corrected, the anticipated time it is expected to continue; steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass; and other information as required by the Department.

**e. Bypass Not Exceeding Limitations**

The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to ensure efficient operation. These bypasses are not subject to the provisions of a., b., c., and d., above. This provision does not relieve the permittee of any notification responsibilities under Part II.C.11. of this permit.

**f. Definitions**

1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

**10. Bioaccumulative Chemicals of Concern (BCC)**

Consistent with the requirements of R 323.1098 and R 323.1215 of the Michigan Administrative Code, the permittee is prohibited from undertaking any action that would result in a lowering of water quality from an increased loading of a BCC unless an increased use request and antidegradation demonstration have been submitted and approved by the Department.

## PART II

### Section C. Reporting Requirements

#### 11. Notification of Changes in Discharge

The permittee shall notify the Department, via MiWaters (<https://miwaters.deq.state.mi.us>), as soon as possible but within no more than 10 days of knowing, or having reason to believe, that any activity or change has occurred or will occur which would result in the discharge of: 1) detectable levels of chemicals on the current Michigan Critical Materials Register, priority pollutants or hazardous substances set forth in 40 CFR 122.21, Appendix D, or the Pollutants of Initial Focus in the Great Lakes Water Quality Initiative specified in 40 CFR 132.6, Table 6, which were not acknowledged in the application or listed in the application at less than detectable levels; 2) detectable levels of any other chemical not listed in the application or listed at less than detection, for which the application specifically requested information; or 3) any chemical at levels greater than five times the average level reported in the complete application (see the first page of this permit, for the date(s) the complete application was submitted). Any other monitoring results obtained as a requirement of this permit shall be reported in accordance with the compliance schedules.

#### 12. Changes in Facility Operations

Any anticipated action or activity, including but not limited to facility expansion, production increases, or process modification, which will result in new or increased loadings of pollutants to the receiving waters must be reported to the Department by a) submission of an increased use request (application) and all information required under R 323.1098 (Antidegradation) of the Water Quality Standards or b) by written notice if the following conditions are met: 1) the action or activity will not result in a change in the types of wastewater discharged or result in a greater quantity of wastewater than currently authorized by this permit; 2) the action or activity will not result in violations of the effluent limitations specified in this permit; 3) the action or activity is not prohibited by the requirements of Part II.C.10.; and 4) the action or activity will not require notification pursuant to Part II.C.11. Following such written notice, the permit or, if applicable, the facility's COC, may be modified according to applicable laws and rules to specify and limit any pollutant not previously limited.

#### 13. Transfer of Ownership or Control

In the event of any change in ownership or control of facilities from which the authorized discharge emanates, the following requirements apply: Not less than 30 days prior to the actual transfer of ownership or control – for non-CAFOs, or within 30 days of the actual transfer of ownership or control – for CAFOs, the permittee shall submit to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) a written agreement between the current permittee and the new permittee containing: 1) the legal name and address of the new owner; 2) a specific date for the effective transfer of permit responsibility, coverage and liability; and 3) a certification of the continuity of or any changes in operations, wastewater discharge, or wastewater treatment.

If the new permittee is proposing changes in operations, wastewater discharge, or wastewater treatment, the Department may propose modification of this permit in accordance with applicable laws and rules.

#### 14. Operations and Maintenance Manual

For wastewater treatment facilities that serve the public (and are thus subject to Part 41 of the NREPA), Section 4104 of Part 41 and associated Rule 2957 of the Michigan Administrative Code allow the Department to require an Operations and Maintenance (O&M) Manual from the facility. An up-to-date copy of the O&M Manual shall be kept at the facility and shall be provided to the Department upon request. The Department may review the O&M Manual in whole or in part at its discretion and require modifications to it if portions are determined to be inadequate.

At a minimum, the O&M Manual shall include the following information: permit standards; descriptions and operation information for all equipment; staffing information; laboratory requirements; record keeping requirements; a maintenance plan for equipment; an emergency operating plan; safety program information; and copies of all pertinent forms, as-built plans, and manufacturer's manuals.

## PART II

### Section C. Reporting Requirements

Certification of the existence and accuracy of the O&M Manual shall be submitted to the Department at least sixty days prior to start-up of a new wastewater treatment facility. Recertification shall be submitted sixty days prior to start-up of any substantial improvements or modifications made to an existing wastewater treatment facility.

#### 15. Signatory Requirements

All applications, reports, or information submitted to the Department in accordance with the conditions of this permit and that require a signature shall be signed and certified as described in the Clean Water Act and the NREPA.

The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

The NREPA (Section 3115(2)) provides that a person who at the time of the violation knew or should have known that he or she discharged a substance contrary to this part, or contrary to a permit, COC, or order issued or rule promulgated under this part, or who intentionally makes a false statement, representation, or certification in an application for or form pertaining to a permit or COC or in a notice or report required by the terms and conditions of an issued permit or COC, or who intentionally renders inaccurate a monitoring device or record required to be maintained by the Department, is guilty of a felony and shall be fined not less than \$2,500.00 or more than \$25,000.00 for each violation. The court may impose an additional fine of not more than \$25,000.00 for each day during which the unlawful discharge occurred. If the conviction is for a violation committed after a first conviction of the person under this subsection, the court shall impose a fine of not less than \$25,000.00 per day and not more than \$50,000.00 per day of violation. Upon conviction, in addition to a fine, the court in its discretion may sentence the defendant to imprisonment for not more than 2 years or impose probation upon a person for a violation of this part. With the exception of the issuance of criminal complaints, issuance of warrants, and the holding of an arraignment, the circuit court for the county in which the violation occurred has exclusive jurisdiction. However, the person shall not be subject to the penalties of this subsection if the discharge of the effluent is in conformance with and obedient to a rule, order, permit, or COC of the Department. In addition to a fine, the attorney general may file a civil suit in a court of competent jurisdiction to recover the full value of the injuries done to the natural resources of the state and the costs of surveillance and enforcement by the state resulting from the violation.

#### 16. Electronic Reporting

Upon notice by the Department that electronic reporting tools are available for specific reports or notifications, the permittee shall submit electronically via MiWaters (<https://miwaters.deq.state.mi.us>) all such reports or notifications as required by this permit, on forms provided by the Department.

**PART II****Section D. Management Responsibilities****1. Duty to Comply**

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit, more frequently than, or at a level in excess of, that authorized, shall constitute a violation of the permit.

It is the duty of the permittee to comply with all the terms and conditions of this permit. Any noncompliance with the Effluent Limitations, Special Conditions, or terms of this permit constitutes a violation of the NREPA and/or the Clean Water Act and constitutes grounds for enforcement action; for permit or COC termination, revocation and reissuance, or modification; or denial of an application for permit or COC renewal.

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**2. Operator Certification**

The permittee shall have the waste treatment facilities under direct supervision of an operator certified at the appropriate level for the facility certification by the Department, as required by Sections 3110 and 4104 of the NREPA. Permittees authorized to discharge storm water shall have the storm water treatment and/or control measures under direct supervision of a storm water operator certified by the Department, as required by Section 3110 of the NREPA.

**3. Facilities Operation**

The permittee shall, at all times, properly operate and maintain all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures.

**4. Power Failures**

In order to maintain compliance with the effluent limitations of this permit and prevent unauthorized discharges, the permittee shall either:

- a. provide an alternative power source sufficient to operate facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit; or
- b. upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce or otherwise control production and/or all discharge in order to maintain compliance with the effluent limitations and conditions of this permit.

**5. Adverse Impact**

The permittee shall take all reasonable steps to minimize or prevent any adverse impact to the surface waters or groundwaters of the state resulting from noncompliance with any effluent limitation specified in this permit including, but not limited to, such accelerated or additional monitoring as necessary to determine the nature and impact of the discharge in noncompliance.



**PART II****Section D. Management Responsibilities****6. Containment Facilities**

The permittee shall provide facilities for containment of any accidental losses of polluting materials in accordance with the requirements of the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code). For a POTW, these facilities shall be approved under Part 41 of the NREPA.

**7. Waste Treatment Residues**

Residuals (i.e. solids, sludges, biosolids, filter backwash, scrubber water, ash, grit, or other pollutants or wastes) removed from or resulting from treatment or control of wastewaters, including those that are generated during treatment or left over after treatment or control has ceased, shall be disposed of in an environmentally compatible manner and according to applicable laws and rules. These laws may include, but are not limited to, the NREPA, Part 31 for protection of water resources, Part 55 for air pollution control, Part 111 for hazardous waste management, Part 115 for solid waste management, Part 121 for liquid industrial wastes, Part 301 for protection of inland lakes and streams, and Part 303 for wetlands protection. Such disposal shall not result in any unlawful pollution of the air, surface waters or groundwaters of the state.

**8. Right of Entry**

The permittee shall allow the Department, any agent appointed by the Department, or the Regional Administrator, upon the presentation of credentials and, for animal feeding operation facilities, following appropriate biosecurity protocols:

- a. to enter upon the permittee's premises where an effluent source is located or any place in which records are required to be kept under the terms and conditions of this permit; and
- b. at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect process facilities, treatment works, monitoring methods and equipment regulated or required under this permit; and to sample any discharge of pollutants.

**9. Availability of Reports**

Except for data determined to be confidential under Section 308 of the Clean Water Act and Rule 2128 (R 323.2128 of the Michigan Administrative Code), all reports prepared in accordance with the terms of this permit and required to be submitted to the Department shall be available for public inspection via MiWaters (<https://miwaters.deq.state.mi.us>). As required by the Clean Water Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Clean Water Act and Sections 3112, 3115, 4106 and 4110 of the NREPA.

**10. Duty to Provide Information**

The permittee shall furnish to the Department via MiWaters (<https://miwaters.deq.state.mi.us>), within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or the facility's COC, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

**PART II****Section E. Activities Not Authorized by This Permit****1. Discharge to the Groundwaters**

This permit does not authorize any discharge to the groundwaters. Such discharge may be authorized by a groundwater discharge permit issued pursuant to the NREPA.

**2. POTW Construction**

This permit does not authorize or approve the construction or modification of any physical structures or facilities at a POTW. Approval for the construction or modification of any physical structures or facilities at a POTW shall be by permit issued under Part 41 of the NREPA.

**3. Civil and Criminal Liability**

Except as provided in permit conditions on "Bypass" (Part II.C.9. pursuant to 40 CFR 122.41(m)), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond the permittee's control, such as accidents, equipment breakdowns, or labor disputes.

**4. Oil and Hazardous Substance Liability**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee may be subject under Section 311 of the Clean Water Act except as are exempted by federal regulations.

**5. State Laws**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

**6. Property Rights**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize violation of any federal, state or local laws or regulations, nor does it obviate the necessity of obtaining such permits, including any other Department of Environment, Great Lakes, and Energy permits, or approvals from other units of government as may be required by law.

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**C**

Record of SWPPP Changes

## Record of SWPPP Changes

Date of Change	Page or Section Changed	Nature of Change	Authorized By

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**D**

Employee Training, Education Program Outline, and  
Trainee Signature Pages

# Annual Stormwater Pollution Prevention Employee Training Program Outline

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- > Permitting of Stormwater Discharges Associated with Industrial Activities
  - Objective of the General Permit
    - > As rainfall moves over and through the ground, it picks up and carries with it natural and human-made pollutants. Final deposition of these pollutants is usually into lakes, rivers, wetlands, coastal waters, or underground drinking water sources. To minimize the potential for pollutants in State water bodies, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) under authority granted by the U.S. Environmental Protection Agency (EPA), developed Individual Permit MI0060064 for District storm water discharges in the State of Michigan. The District's Permit became effective on August 1, 2021 and will expire on October 1, 2024.
  - Sector-specific requirements of the Multi-Sector General Permit
    - > Woodhaven Brownstown School District has obtained coverage under this Permit and is therefore required to implement certain operational procedures to minimize the potential for pollutant contact with storm water as well as prepare a Plan, conduct inspections, maintain records, implement Best Management Practices (BMPs), and conduct reporting related to appropriate on-site storm water management. A site-specific SWPPP has been prepared and is maintained in the Facility environmental files. The Plan addresses the following:
      - Storm Water Pollution Prevention Team (PPT) Members;
      - Industrial activities conducted on-site that are exposed to precipitation;
      - Site-specific storm water drainage features;
      - Locations of storm water outfalls;
      - On-site significant material handling and management practices;
      - BMPs implemented to minimize and/or prevent contamination of storm water run-off; and
      - Inspections, examinations, monitoring, and recordkeeping requirements.
- > Overview of Stormwater Pollution Prevention Plan (SWPPP)
  - Identify the Facility pollution prevention team and their responsibilities;
  - Identify Facility areas of industrial activities exposed to storm water, storm water drainage features, and locations of outfalls; and
  - Discuss the importance of good housekeeping and maintenance of equipment in reducing the potential for storm water pollution.
- > Review of Proper Material Management and Handling Practices
  - Review hazardous materials, chemicals, and fluids handled on-site;
  - Identify locations where hazardous materials are stored on-site and exposed to precipitation;
  - Identify management practices that have been instituted to reduce contact of hazardous materials with storm water; and
  - Describe structural (e.g., secondary containments, vegetation, retention pond, etc.) and non-structural controls (e.g., best management practices, good housekeeping, inspections, monitoring, etc.) used to eliminate and/or reduce release of pollutants into storm water run-off.
- > Stormwater Inspections and Monitoring

- Discuss procedures for inspection of storm water controls and areas of the Facility that could be potential sources of storm water pollution;
  - Identify methods that will be used to follow up on items identified during inspections to make sure that corrections have been made;
  - Discuss procedures for collection of samples from a representative storm water discharge; and
    - Discuss proper completion and timely submission of sampling and Progress Reports.
- > Discharge Response Procedures

In the event of a spill, all Facility personnel should be aware of and be able to implement the following spill response procedures:

- > **Notify management.** The first person on the scene should immediately notify the Director and Facility Manager using established Facility procedures for emergency contact. Once notified, the responsible person must notify the primary contact. The management team will determine the need to notify authorities and regulatory agencies and the actions required to safeguard personnel (i.e., evacuation, personal protection, etc.).
- > **Provide spill information.** Location of the spill, what material is spilled, cause of the spill, amount of the spilled material, and what actions are being taken.
- > **Stop flow at source.** After all required safety-related measures have been implemented, further release will be prevented to the extent possible by cutting flow off at the source.
- > **Contain spill.** After required safety precautions and containment equipment are determined, containment procedures will be implemented. Portable booms, sand, and absorbent may be placed around containment points.
- > **Cleanup spill.** To the extent practicable, spilled material should be retrieved and stored in leak-proof containers until proper disposal takes place. Contaminated cleanup equipment should be properly decontaminated or disposed.
- > **Disposal of contaminated material.** Contaminated material will be disposed of off-site in accordance with all federal, state, and local regulations. Exact means of disposal will depend upon the nature and volume of the contaminated material.
- > **Record spill event information.** Ensure that a record of the spill event is completed as soon as practicable in order to include as much detail as possible. The record should list spill location, date, time, duration, and weather conditions. In addition, an estimate of the type and amount of material spilled and recovered, brief description of the cause of the spill, summary of any environmental damage, list of parties notified, and description of implemented response procedures should be included.
- > **Replace used spill equipment.** The inventory of response materials and equipment should be assessed and restocked as necessary.

**NOTE:** the outline above is provided for guidance purposes only. Parts 1 and 2 of this outline should be covered during an employee education program provided to the employees who do not have direct responsibility for the SWPPP implementation at this Facility.

**Michael Belcher** is responsible for ensuring appropriate implementation of the Plan and all matters related to compliance with the permit and should be contacted if there are any questions or comments regarding this program.

## Employee Education Program Signature Sheet

Copy this form as needed. Retain complete records for 3 years. File completed forms in the on-site compliance binder.



.....

Date of Session:

## Trainer

Print:

Signature: \_\_\_\_\_

Topics Covered:

## STORM WATER EMPLOYEE TRAINING VIDEOS

- IDEP Working for Clean Water Training Video Website link

<https://www.youtube.com/watch?v=qRljMX4eaS8>

- EGLE Industrial Storm Water Annual Training Video

<https://www.youtube.com/watch?v=GyOFmXViQ4I>

- DEQ STORM WATER EMPLOYEE TRAINING VIDEO- Website link

<https://www.youtube.com/watch?v=IGqvsztguRA&feature=youtu.be>

[illegible]



# IMPORTANT NUMBERS

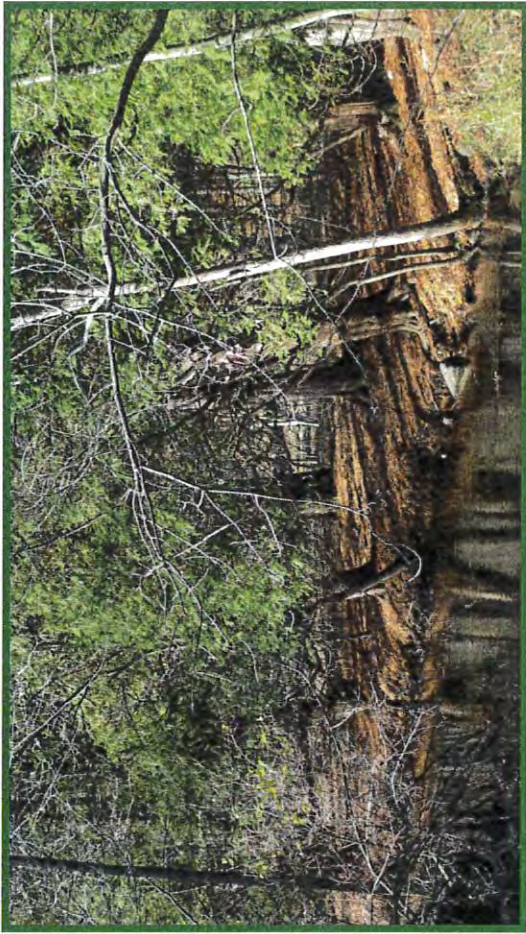
EMERGENCIES			
Police/fire	911		24-hour
MDEQ Pollution Alert Systems (PEAS)	800-292-4706		24-hour
NON-EMERGENCIES			
Livingston County Health Department Drain Office	517-546-9858 517-546-0040		8 a.m.-5 p.m.
Macomb County	877-679-4337		24-hour
Monroe County Drain Commissioner	734-240-3115		24-hour
Oakland County	248-858-0931		24-hour
St. Clair County	877-504-SWIM		24-hour
Washtenaw County	734-222-3800		8:30 a.m.-5 p.m.
Wayne County	888-223-2363		24-hour
Local IDEP Coordinator:			
Local Soil Erosion Control Agency:			

Developed by the Southeast Michigan Regional IDEP Work Group

Available for download at:

<http://www.allianceofroutecommunities.com/PDFs/technical/IDEP%20Tip%20Card2.pdf>

# HOW TO SPOT ILLICIT DISCHARGES A Tip Card for Municipal Staff



An illicit discharge is any discharge containing polluting material, such as sediment, nutrients, oil and bacteria. These discharges can drain to lakes and streams via storm drains. The communities in Southeast Michigan are required to prevent illicit discharges from entering storm water. You can do your part by notifying the appropriate agency when you spot a potential illicit discharge.

## WHAT SHOULD YOU REPORT?

- Spills and contamination to lakes, rivers and streams
- Suspicious dumping to catch basins or waterways
- Unusual discharges from pipes
- Sewage on the ground or draining to surface water
- Large number of dead fish in waterways
- Failing or leaky septic systems
- Polluted runoff from storage piles or dumpsters to catch basins or waterways
- Sewage, detergent, chemical, petroleum or rotten egg odors
- Soil erosion from construction sites



# WHAT ARE THE SIGNS OF AN ILLICIT DISCHARGE?

## SANITARY SEWER DISCHARGE

### Signs:

- Sanitary debris
- Staining on pipe
- Soap suds
- Gray or discolored water
- Smells like sewage, rotten eggs or detergents



Soap suds



Gray staining



Broken sanitary sewer

### Contact:

IDEP coordinator and/or DPW

## FAILED SEPTIC SYSTEMS

### Signs:

- Overgrown or wet patch of grass
- Cheater pipe to ditch
- Soap suds
- Gray or discolored water
- Smells like sewage, rotten eggs or detergents



Overgrown septic field



Cheater pipe from septic field

### Contact:

Health Department and/or IDEP coordinator

## ILLEGAL DUMPING, SPILLS OR FLOOR DRAIN CONNECTIONS

### Signs:

- Oil sheen
- Stained sediment, rocks or vegetation
- Smells like petroleum or chemicals

### Contact:

IDEP coordinator or MDEQ



Oil sheen

## INDUSTRIAL DISCHARGES

### Signs:

- Discolored water or vegetation
- Smells like petroleum or chemicals

### Contact:

IDEP coordinator and/or DPW



White foam

## AGRICULTURAL RUNOFF, FERTILIZERS OR SANITARY SEWER WASTE

### Signs:

- Algae growth near drain outlet or in a ditch

### Contact:

IDEP coordinator, DPW and/or Drain Office



Excessive algae

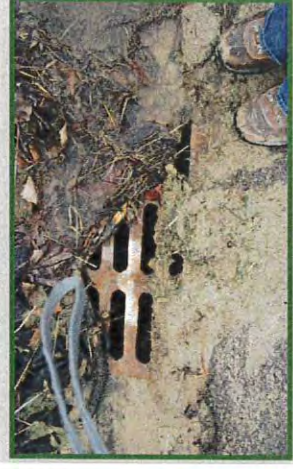
## SOIL EROSION FROM CONSTRUCTION SITES

### Signs:

- Bare soils or banks with no soil erosion control fencing
- Muddy discharge from an outfall

### Contact:

Local soil erosion control agency (local community or county)



Soil erosion



# SEMU Webinar: Alert Observer Training - October 2021



October 27, 2021

[Join the Meeting](#) **(Type in your name and email, then click the big blue button in the bottom left-hand corner that says Register or Join Meeting in Progress to login.)**

You are invited to attend this virtual training focused on being an illicit discharge alert observer. During this training, attendees will learn about signs of illicit discharges, tools for reporting these problems, and how to engage in public outreach on this topic. This training will meet the requirements in your local Municipal Separate Storm Sewer System (MS4) permit and is offered in partnership with the Partners for Clean Water, our member counties and the Alliance of Rouge Communities.

For meeting information, contact Katie Grantham at (313) 296-9096 [grantham@semcog.org](mailto:grantham@semcog.org)

Click the register button below to register. For registration assistance, e-mail SEMCOG at [register@semcog.org](mailto:register@semcog.org) or call (313) 961-4266. **After registering, you will receive two confirmation emails – an initial message from [register@semcog.org](mailto:register@semcog.org) and also a message generated by Zoom (this typically comes a little later; please allow at least 30 minutes) with information about logging into the event. When you receive the Zoom email, please click on the link to add this event to your calendar so you have it handy on the day of the event.**

## When

10/27/2021 10:30 AM - 11:30 AM

# Illicit Discharge Elimination Program Investigator Training



October 27, 2021

[Join the Meeting](#) **(Type in your name and email, then click the big blue button in the bottom left-hand corner that says Register or Join Meeting in Progress to login.)**

You are invited to attend a virtual Illicit Discharge Elimination Program and Pollution Prevention training. The IDEP Investigator Training is targeted towards those who work directly with identifying and eliminating illicit discharges and connections. This training will meet the requirements in your local Municipal Separate Storm Sewer System (MS4) permit and is offered in partnership with the Partners for Clean Water, our member counties and the Alliance of Rouge Communities.

For meeting information, contact Katie Grantham at (313) 296-9096 or [grantham@semcog.org](mailto:grantham@semcog.org)

Click the register button below to register. For registration assistance, e-mail SEMCOG at [register@semcog.org](mailto:register@semcog.org) or call (313) 961-4266. **After registering, you will receive two confirmation emails – an initial message from [register@semcog.org](mailto:register@semcog.org) and also a message generated by Zoom (this typically comes a little later; please allow at least 30 minutes) with information about logging into the event. When you receive the Zoom email, please click on the link to add this event to your calendar so you have it handy on the day of the event.**

## When

10/27/2021 1:00 PM - 3:00 PM



# SEMU Webinar: Pollution Prevention and Good Housekeeping



October 28, 2021

[Join the Meeting](#) **(Type in your name and email, then click the big blue button in the bottom left-hand corner that says Register or Join Meeting in Progress to login.)**

During this training, attendees will learn about procedures for municipal facilities (i.e., fleet maintenance, public works) for proper stormwater management and permit compliance. This training is recommended for public works staff who are interested in learning good housekeeping procedures at their maintenance facilities. This training will meet the requirements in your local Municipal Separate Storm Sewer System (MS4) permit and is offered in partnership with the Partners for Clean Water, our member counties and the Alliance of Rouge Communities.

For meeting information, contact Katie Grantham at (313) 296-9096 [grantham@semcog.org](mailto:grantham@semcog.org)

Click the register button below to register. For registration assistance, e-mail SEMCOG at [register@semcog.org](mailto:register@semcog.org) or call (313) 961-4266. **After registering, you will receive two confirmation emails – an initial message from [register@semcog.org](mailto:register@semcog.org) and also a message generated by Zoom (this typically comes a little later; please allow at least 30 minutes) with information about logging into the event. When you receive the Zoom email, please click on the link to add this event to your calendar so you have it handy on the day of the event.**

## When

10/28/2021 10:30 AM - 11:30 AM

[illegible]

Training Conducted by (Signature):\_\_\_\_\_

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**E**

Plan Certifications



## Certification of Accuracy of the SWPPP by Authorized Representative and Certified Storm Water Operator

The permit requires that the SWPPP will be reviewed and signed by the Certified Storm Water Operator(s) and by either the permittee or an authorized representative in accordance with 40 CFR 122.22. The SWPPP will be retained on-site at the Facility which generates the storm water discharge.

I certify under penalty of law that the storm water drainage system in this SWPPP has been tested or evaluated for the presence of non-storm water discharges either by me, or under my direction and supervision. I certify under penalty of law that this SWPPP has been developed in accordance with the General Permit and with good engineering practices. To the best of my knowledge and belief, the information submitted is true, accurate, and complete. At the time this plan was completed no unauthorized discharges were present. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations.

### Permittee or Authorized Representative

Printed Name & Title:

Michael Belcher Director of Transportation & Support Services / Environmental Compliance Manager

Signature and Date:

### Industrial Storm Water Certified Operator

Printed Name & Title:

Michael Belcher Director of Transportation & Support Services / Environmental Compliance Manager

Signature and Date:

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**F**

Incident/Spill Reporting Forms



## SPILL OR RELEASE REPORT

NOTE: Some State and Federal regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures MUST be used and followed if reporting under those regulations. Please refer to the Michigan Reporting Requirements Tool to aid you in determining the proper form to use. This report form, although not required to be used, is designed to aid person to report releases under regulations. To report a release, some regulations require a facility to call the EGLE PEAS Hotline at 800-292-4706 (or the EGLE District Office that oversees the county where it occurred) and other agencies and provide information that is included in this form. This form may also be used for the written follow-up report to the department. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. Go to [www.michigan.gov/chemrelease](http://www.michigan.gov/chemrelease) for more information.

Please print or type all information.

Name of Person Submitting Written Report		Title of Person Submitting Written Report		Telephone Number (provide area code)		
Name of Business		Release Location (Provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.)				
Street Address						
City	State					ZIP
Business Telephone Number (provide area code)						
Site Identification Number and Other Identifying Numbers (if applicable)		County	Township	Tier/Range/Section (if known)		
<b>Release Data:</b> Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary.						
<b>Date of Release</b> (if known)	<b>Date of Discovery</b>	<b>Duration of Release</b> (if known)	<b>Type of Incident</b>			
<b>Time of Release</b> (if known)	<b>Time of Discovery</b>	<input type="text"/> days <input type="text"/> hours <input type="text"/> minutes	<input type="checkbox"/> Explosion <input type="checkbox"/> Loading/unloading release <input type="checkbox"/> Fire <input type="checkbox"/> Pipe/valve leak or rupture <input type="checkbox"/> Leaking container <input type="checkbox"/> Vehicle accident <input type="checkbox"/> Other <input type="text"/>			
Material Released (chemical or trade name)		CAS Number or Hazardous Waste Code	Estimated Quantity Released (indicate unit e.g. lbs, gals, cu ft or yds)	Physical State Released (indicate if solid, liquid, or gas)		
<input type="checkbox"/> Check here if additional materials listed on the attached page						

Factors Contributing to Release		Source of Loss	
<input type="checkbox"/> Equipment failure <input type="checkbox"/> Operator error <input type="checkbox"/> Faulty process design	<input type="checkbox"/> Training deficiencies <input type="checkbox"/> Unusual weather conditions <input type="checkbox"/> Other <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>	<input type="checkbox"/> Container <input type="checkbox"/> Railroad car <input type="checkbox"/> Pipeline <input type="checkbox"/> Ship	<input type="checkbox"/> Tanker <input type="checkbox"/> Tank <input type="checkbox"/> Truck <input type="checkbox"/> Other <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>
<b>Type of Material Released</b>  <input type="checkbox"/> Agricultural: manure, pesticide, fertilizer <input type="checkbox"/> Chemicals <input type="checkbox"/> Flammable or combustible liquid <input type="checkbox"/> Hazardous waste <input type="checkbox"/> Liquid industrial waste <input type="checkbox"/> Oil/petroleum products or waste <input type="checkbox"/> Salt <input type="checkbox"/> Sewage <input type="checkbox"/> Unknown <input type="checkbox"/> Other <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>	<b>Material Listed on or Defined by</b>  <input type="checkbox"/> CAA Section 112(r) list (40 CFR Part 68) <input type="checkbox"/> CERCLA Table 302.4 (40 CFR Part 302) <input type="checkbox"/> EPCRA Extremely Hazardous Substance (40 CFR Part 355) <input type="checkbox"/> NREPA Part 31, Part 5 Rules polluting material <input type="checkbox"/> NREPA Part 111 or RCRA hazardous waste <input type="checkbox"/> NREPA Part 121 liquid industrial waste <input type="checkbox"/> Unknown <input type="checkbox"/> Other <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>	<b>Immediate Actions Taken</b>  <input type="checkbox"/> Containment <input type="checkbox"/> Diversion of release to treatment <input type="checkbox"/> Dilution <input type="checkbox"/> Evacuation <input type="checkbox"/> Decontamination of persons or equipment <input type="checkbox"/> Hazard removal <input type="checkbox"/> Neutralization <input type="checkbox"/> Monitoring <input type="checkbox"/> System shut down <input type="checkbox"/> Other <div style="border: 1px solid black; height: 20px; margin-top: 5px;"></div>	
<b>Release Reached</b> <input type="checkbox"/> Surface waters (include name of river, lake, drain involved) <div style="border: 1px solid black; width: 300px; height: 20px; display: inline-block;"></div> <input type="checkbox"/> Distance from spill location to surface water, in feet <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> <input type="checkbox"/> Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) <div style="border: 1px solid black; width: 400px; height: 20px; display: inline-block;"></div> <input type="checkbox"/> Drain connected to storm sewer (include name of drain or water body it discharges into, if known) <div style="border: 1px solid black; width: 470px; height: 20px; display: inline-block;"></div> <input type="checkbox"/> Groundwater: <div style="margin-left: 40px;">Is it a known or suspected drinking water source? Yes <input type="checkbox"/> No <input type="checkbox"/></div> <div style="margin-left: 40px;">What is the name of aquifer, if known? <div style="border: 1px solid black; width: 230px; height: 20px; display: inline-block;"></div></div> <div style="margin-left: 40px;"><input type="checkbox"/> Soils (include type e.g. clay, sand, loam, etc.) <div style="border: 1px solid black; width: 230px; height: 20px; display: inline-block;"></div></div> <div style="margin-left: 40px;"><input type="checkbox"/> Ambient Air</div> <div style="margin-left: 40px;"><input type="checkbox"/> Spill contained on impervious surface</div>			
<b>Extent of Injuries(if any)</b>  <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>		<b>Was Anyone Hospitalized?</b> <input type="checkbox"/> Yes Number Hospitalized: <div style="border: 1px solid black; width: 40px; height: 20px; display: inline-block;"></div> <input type="checkbox"/> No	<b>Number of Injuries Treated Onsite:</b>  <div style="border: 1px solid black; width: 40px; height: 20px; display: inline-block;"></div>

Describe the incident, the type of equipment involved in the release, how the volume of loss was determined, along with any resulting environmental damage caused by the release. Identify who immediately responded to the incident (own employees or contractor — include cleanup company name, contact person, and telephone number). Also identify who did further cleanup activities if performed or known when report submitted.

☐ Check here if description or additional comments are included on attached page

Estimated quantity of any recovered materials and a description of how those materials were managed (include disposal method if applicable)

☐ Check here if description or additional comments are included on attached page

Assessment of actual or potential hazards to human health (Include known acute or immediate and chronic or delayed effects, and where appropriate, advice regarding medical attention necessary for exposed individuals.)

☐ Check here if description or additional comments are included on attached page

**Michigan Department of Environment, Great Lakes, and Energy Notified**

Initial Contact by: ☐ Phone ☐ FAX  
☐ Email ☐ Other

Date of Initial Contact

Time of Initial Contact

All EGLE Staff Contacted

Telephone Number


Name of Person Making Initial Report

Title of Person Making Initial Report

Contact made by calling EGLE Pollution Emergency Alerting System (PEAS):  
800-292-4706

Log Number Assigned

EGLE District or Field Office:

☐ Bay City ☐ Cadillac ☐ Calumet  
☐ Crystal Falls ☐ Detroit ☐ Gaylord  
☐ Grand Rapids ☐ Jackson ☐ Kalamazoo  
☐ Lansing ☐ Marquette ☐ Newberry  
☐ Warren

**Note:** EGLE Office locations are subject to change

**Divisions or Offices Contacted**

☐ Air Quality Division  
☐ Drinking Water and Environmental Health Division  
☐ Environmental Support Division  
☐ Materials Management Division  
☐ Office of Climate and Energy  
☐ Office of the Clean Water Public Advocate  
☐ Office of the Environmental Justice Public Advocate  
☐ Office of the Great Lakes  
☐ Oil, Gas, and Minerals Division  
☐ Remediation and Redevelopment Division  
☐ Water Resources Division

Date: Time:

[illegible]

Telephone Number:

\_\_\_\_\_

\_\_\_\_\_

**Signature of Person Submitting Written Report**

This form and its contents are subject to the Freedom of Information Act and may be released to the public.

**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**G**

Recordable Spills and Leaks

# Recordable Spill Log

Time/Date	Name of Person Involved in Spill and Actions that Led to Spill	Quantity of Spill (Gallons)	Date Cleanup Started	Damage to Property or Environment (give details)	Provide Detail of how the Spill was Remediated



**SWPPP |**  
**Woodhaven Brownstown**  
**School District**

Attachment

**H**

Facility Comprehensive Inspection and  
Inspection Forms

# Visual Storm Water Assessment Form (Wet Weather Visual Sampling)

<b>Quarterly Inspection:</b>  <b>Inspection Date:</b>  <b>Inspection Time:</b>  <b>Nature of discharge:</b>  <b>Were samples taken within first 30 minutes of event?</b>	<input type="checkbox"/> Jan – March		<input type="checkbox"/> April - June		<input type="checkbox"/> July - Sept		<input type="checkbox"/> Oct - Dec			
			<b>Inspector Name and Certification #:</b>  <b>Storm Event information:</b>  <b>If 'No', why not?</b>							
					Duration (hrs.)		Size (inches)		# Days since previous event	
	Rain <input type="checkbox"/>	Snowmelt <input type="checkbox"/>								
	Yes <input type="checkbox"/>	No <input type="checkbox"/>								
<b>Has the Facility attached a full color photo of all water samples collected (required)?</b> <i>Attach photo of sample against a white background</i>					Yes <input type="checkbox"/> No <input type="checkbox"/>					
<b>Has this visual inspection been conducted within 30 days of the Comprehensive Facility Inspection (required)?</b>					Yes <input type="checkbox"/> No <input type="checkbox"/>					

### Discharge Location Observations

		N/A	Yes	No
<b>Discharge Location 1: Eastern entrance gate (SW-1).</b>				
Have the following indicators been observed within storm water discharge?				
> Loose litter, debris, floating materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Discolorations, odors, oil and grease, other pollutants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Turbidity, sediment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Discharge Location 2: Drain south of fuel pumps, directly west of fuel tanks (SW-2).</b>				
Have the following indicators been observed within storm water discharge?				
> Loose litter, debris, floating materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Discolorations, odors, oil and grease, other pollutants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Turbidity, sediment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Discharge Location (Alternate between SW-3 through SW-7): _____ (Record location here)</b>				
Have the following indicators been observed within storm water discharge?				
> Loose litter, debris, floating materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Discolorations, odors, oil and grease, other pollutants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Turbidity, sediment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>I certify that the above information is correct and that the Facility is in compliance with the SWPPP:</b>				
Name:		Signature / Date:		
(Certified Inspector Must Sign)				

**Corrective Actions****Note any incidents of non-compliance:****Note any corresponding corrective actions:****Note any resulting SWPPP amendments needed:****Note any BMP clean-up maintenance conducted and amount of debris cleaned:**

Attach additional pages as necessary.

# Quarterly Comprehensive Site Inspection Form

<b>Quarterly Inspection:</b>	<input type="checkbox"/> Jan -- March	<input type="checkbox"/> April - June	<input type="checkbox"/> July - Sept	<input type="checkbox"/> Oct - Dec
<b>Inspection Date:</b>		<b>Inspector Name and Certification #:</b>		
<b>Inspection Time:</b>		<b>Weather Conditions:</b>		
<b>Recent Precipitation Description (if any):</b>				

		N/A	Yes	No
<b>Bus Services Building</b>				
Have the following indicators been observed within the drainage area?				
> Discolorations, stains, odors, floating materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Non-storm water discharges	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Loose litter and/or debris	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Parking Area</b>				
Have the following indicators been observed within the drainage area?				
> Discolorations, stains, odors, floating materials	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Non-storm water discharges	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Loose litter and/or debris	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Records Review</b>				
Have the following records been maintained and up-to-date over the past quarter?				
> Routine preventive maintenance and housekeeping reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Quarterly discharge sampling reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
> Annual SWPPP review report to MDEQ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>I certify that the above information is correct and that the Facility is in compliance with the SWPPP:</b>				
Name:		Name:		
(Certified Inspector Must Sign)		(Certified Inspector Must Sign)		

**Corrective Actions**

<b>Note any incidents of non-compliance:</b>
<b>Note any corresponding corrective actions:</b>
<b>Note any resulting SWPPP amendments needed:</b>
<b>Note any BMP clean-up maintenance conducted and amount of debris cleaned:</b>

Attach additional pages as necessary.

# SPCC INSPECTION FORM

Inspector Name:		Inspection Date:	
Inspector Title:		Inspector Signature:	

Tank Setting(s) Inspected:


## STORAGE TANKS

Inspection Results		YES	NO	NA
1.	Is there any evidence of leakage at the tank seams, connections, or bolts on the tank? Evidence may include drip marks; discoloration; puddles containing spilled or leaked material; corrosion; cracks; and/or localized dead/stressed vegetation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Is the paint coating in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Is there any leakage at joints, connections, pumps, or valves in the transfer hoses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Is there any damage to transfer hose supports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is the secondary containment free of standing liquids?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Is there any evidence of leaks (discoloration, stressed vegetation, drip marks, corrosion, etc.) or accumulation of oil within the secondary containment system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Is there any damage to the secondary containment system (erosion, cracking, punctures, etc.) that could affect its capability to contain an oil spill?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Is the containment area free of debris, equipment, containers, and other extraneous materials so as to maximize the volume available for spill containment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Is the level gauge on the tanks tested regularly and maintained in proper working order? If so, when was it last tested? _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Are there any signs of settlement or distortion in the tank system or foundation that has not been previously evaluated by a qualified tank inspector?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Is appropriate spill response equipment stored in the location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	Does the on-site inventory (items and quantity) of spill response equipment in the product testing area match	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13.	Is the spill response equipment maintained in operational condition and easily accessible to all employees that may be expected to use it (i.e. shed unlocked)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	Does the piping have any punctures or cracks that indicate any leakage is occurring?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## CONTAINERS/DRUMS/TOTES

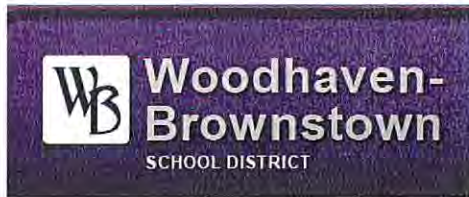
Inspection Results	YES	NO	NA
15. Were all of the following small bulk oil storage containers (i.e.: drums, tanks, and totes) elevated from the ground surface and inspected from all sides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16. Does the integrity of any of the small bulk oil storage containers (i.e.: drums and totes) appear to be compromised? If so, list specific containers:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Are the secondary containment systems free of standing liquids? If not, list specific containers:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18. Is there any damage to the secondary containment system (erosion, cracking, punctures, etc.) that could affect its capability to contain an oil spill? If so, list specific containers:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Is there any evidence of leaks (discoloration, stressed vegetation, drip marks, corrosion, etc.) or accumulation of oil within the secondary containment system? If so, list specific containers:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Is the containment area free of debris, equipment, containers, and other extraneous materials so as to maximize the volume available for spill containment? If not, list specific containers:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
21. Is appropriate indoor spill response equipment stored in the locations identified	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
22. Does the on-site inventory (items and quantity) of spill response equipment located inside the building match	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
23. Is the spill response equipment maintained in operational condition and in an easily accessible location to all employees that may be expected to use it?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## OIL SPILLS

Inspection Results	YES	NO	NA
24. Did any spills of oil occur at the Facility since the last inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. If yes, did the spill reach the perimeter drainage ditches?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26. Was the incident properly reported, responded to, and adequately remediated and the records maintained on-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

[illegible]





## Storm Water Catch Basin Inspection & Cleaning Procedure

### *Cleaning Procedure*

Catch basin inspection cleaning procedures should address both the grate opening and the basin's sump. Document any and all observations about the condition of the catch basin structure and water quality on the Catch Basin Inspection Form (attached).

Catch basin inspection and cleaning procedures include the following:

1. Work upstream to downstream.
2. Clean sediment and trash off grate.
3. Visually inspect the outside of the grate.
4. Visually inspect the inside of the catch basin to determine cleaning needs.
5. Inspect catch basin for structural integrity.
6. Determine the amount of sediment in sump and record in document; report this information to Director of Support Services when sump is 2/3 full for scheduling cleaning with contractor.
7. If contamination is suspected, chemical analysis will be required to determine if the materials comply with the Federal and State hazardous waste rules. Chemical analysis required will depend on suspected contaminants. Note the identification number of the catch basin on the sample label, and note sample collection on the Catch Basin Inspection Form.
8. Manifest copy to be provided by contractor for record keeping to insure collected sediments are disposed of at approved landfill.
9. If fluids collected during catch basin cleaning are not being handled and disposed of by a third party, dispose of these fluids to a sanitary sewer system, with permission of the system operator.
10. If illicit discharges are observed or suspected, notify the Support Services Director.
11. At the end of each day, document location and number of catch basins cleaned, amount of waste collected, and disposal method for all screenings.
12. Report additional maintenance or repair needs to the Support Services Director.

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_



### CATCH BASIN INSPECTION FORM

<b>Catch Basin I.D.</b>		<b>Final Discharge from Structure?</b> Yes <input type="checkbox"/> No <input type="checkbox"/> <b>If Yes, Discharge to Outfall No:</b> _____	
<b>Catch Basin Label:</b>	Stencil <input type="checkbox"/> Ground Inset <input type="checkbox"/> Sign <input type="checkbox"/> None <input type="checkbox"/> Other _____		
<b>Basin Material:</b>	Concrete <input type="checkbox"/> Corrugated metal <input type="checkbox"/> Stone <input type="checkbox"/> Brick <input type="checkbox"/> Other: _____ <input type="checkbox"/>	<b>Catch Basin Condition:</b>	Good <input type="checkbox"/> Poor <input type="checkbox"/> Fair <input type="checkbox"/> Crumbling <input type="checkbox"/>
<b>Pipe Material:</b>	Concrete <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Clay Tile <input type="checkbox"/> Other: _____ <input type="checkbox"/>	<b>Pipe Measurements:</b>	Inlet Dia. (in): d= _____ Outlet Dia. (in): D= _____
<b>Required Maintenance/ Problems (check all that apply):</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> Tree Work Required  <input type="checkbox"/> New Grate is Required  <input type="checkbox"/> Pipe is Blocked  <input type="checkbox"/> Frame Maintenance is Required  <input type="checkbox"/> Remove Accumulated Sediment  <input type="checkbox"/> Pipe Maintenance is Required  <input type="checkbox"/> Basin Undermined or Bypassed </div> <div style="width: 48%;"> <input type="checkbox"/> Cannot Remove Cover  <input type="checkbox"/> Ditch Work  <input type="checkbox"/> Corrosion at Structure  <input type="checkbox"/> Erosion Around Structure  <input type="checkbox"/> Remove Trash &amp; Debris  <input type="checkbox"/> Need Cement Around Grate  <b>Other:</b> _____ </div> </div>			
<b>Catch Basin Grate Type :</b>	<b>Sediment Buildup Depth :</b>	<b>Description of Flow: (Dry Weather)</b>	<b>Street Name/ Structure Location:</b>
Bar: <input type="checkbox"/> Cascade: <input type="checkbox"/> Other: _____  Properly Aligned: Yes <input type="checkbox"/> No <input type="checkbox"/>	0-6 (in): _____ 6-12(in): _____ 12-18 (in): _____ 18-24 (in): _____ 24 + (in): _____	Heavy <input type="checkbox"/> Moderate <input type="checkbox"/> Slight <input type="checkbox"/> Trickling <input type="checkbox"/>	
<b>*If the outlet is submerged check yes and indicate approximate height of water above the outlet invert. h above invert (in):</b> _____		Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/> Flow <input type="checkbox"/> Standing Water <b>(check one or both)</b>	<b>Observations:</b> Color: _____ Odor: _____	<b>Circle those present:</b> Foam Sanitary Waste Orange Staining Excessive sediment Other: _____	
<b>Weather Conditions :</b> Dry > 24 hours <input type="checkbox"/> Wet <input type="checkbox"/>			
<b>Sample of Screenings Collected for Analysis?</b> Yes <input type="checkbox"/> No <input type="checkbox"/>			
<b>Comments:</b>   		Oil Sheen Bacterial Sheen Floatables Pet Waste Other: _____	

## Inspection and Maintenance Checklist

Field Inspector(s): \_\_\_\_\_ Reason for Inspection: \_\_\_\_\_

[illegible]

- 1 – Accumulated Sediment
- 2 – Trash & Debris
- 3 – Vegetation Concerns
- 4 – Water Quality Concerns

9 – Damaged Pipes  
10 – Mosquito/Vector Breeding  
11 – Other  
12 – Could Not Locate

**Make additional copies of this page as needed for field inspections.**

## MH Structures

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment exceeds 60% of sump depth. Sediment depth within 6 inches of the invert of the lowest pipe.
2	Trash & Debris	Trash or debris in front of catch basin opening or blocking inlet by more than 10%. Trash or debris exceeds 60% of sump depth. Trash or debris within 6 inches of the invert of the lowest pipe. Trash or debris blocking more than 1/3 of any inlet or outlet pipe. Trash and debris blocking more than 20% of grate surface. Dead animals or vegetation that generate odors and cause complaints or dangerous gases (e.g., methane).
3	Vegetation	Vegetation growing across and blocking more than 10% of the grate opening. Vegetation growing in inlet/outlet pipe joints that is more than six inches tall.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants. Water flowing in catch basin during dry weather – report as potential illicit discharge concern.
5	Water Flow	Impeded water flow due to vegetation or sediment (use appropriate code from above).
6	Erosion	N/A
7	Cover/Frame/Grate	Cover is missing or only partially in place. One maintenance person cannot remove lid after applying normal lifting pressure. Frame separated by more than 3/4 inch from top slab. Frame not securely attached. Locking mechanism cannot be opened by one maintenance person with proper tools. Bolts into frame have less than 1/2 inch of thread. Grate with opening wider than 7/8 inch. Grate damaged or missing.
8	Structure	Top slab with holes larger than 2 square inches or cracks wider than 1/4 inch. Fractures or cracks in basin walls or bottom. Grout at inlet/outlet pipes has separated or cracked wider than 1/2 inch and longer than one foot. Soil is entering the catch basin through cracks in the structure. Settlement has created a safety, function, or design problem. Field inspector judges that structure is unsound.
9	Damaged Pipes	Inlet or outlet piping damaged or broken and in need of repair.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)

Maintenance Code	Type	Conditions When Maintenance Is Needed
11	Other	<p>Ladder is unsafe due to missing rungs, not securely attached to basin wall, misalignment, rust, cracks, or sharp edges.</p> <p>Catch basin insert requires replacement if:</p> <ul style="list-style-type: none"> <li>• Sediment, trash or debris blocks water flow through the insert,</li> <li>• Effluent water from the insert has a visible sheen, or</li> <li>• Insert is saturated with water or oil and can no longer absorb.</li> </ul>
12	Could Not Locate	Field inspectors are unable to locate the catch basin or manhole.

### Conveyance Systems (Pipes and Ditches)

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment or debris exceeds 20% of pipe diameter or 20% of debris barrier openings. Accumulated sediment that exceeds 20% of the design depth of the ditch.
2	Trash & Debris	Trash and debris accumulated in pipe or ditch. Visual evidence of dumping
3	Vegetation	Vegetation reduces movement of water through pipes. Excessive vegetation that reduces free movement of water through ditches.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants. Water flowing in pipes or ditch during dry weather – report as potential illicit discharge concern.
5	Water Flow	Impeded water flow due to vegetation or sediment (use appropriate code from above). Standing water in the pipe or swale between storm events.
6	Erosion	Erosion damage over 2 inches deep where cause is still present or there is potential for continued erosion. Native soil is visible beneath the rock lining of a conveyance ditch.
7	Cover/Frame/Grate	N/A
8	Structure	Debris barrier/trash rack is missing or not attached to pipe. Debris barrier/trash rack bars are bent by more than 3 inches. Debris barrier/trash rack bars are loose or rust is causing 50% deterioration to any part of the barrier.
9	Damaged Pipes	Protective coating is damaged or rust is causing more than 50% deterioration to any part of pipe. Any dent that decreases the flow area by more than 20% or puncture that impacts performance.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	
12	Could Not Locate	Field inspectors are unable to locate the pipe or ditch.

### Green Roofs (or Roof Gardens)

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Inlets to roof drainage system clogged with sediment.
2	Trash & Debris	Inlets to roof drainage system clogged with trash or debris. Trash and debris accumulated on the roof.
3	Vegetation	Planted vegetation becomes excessively tall. Presence of poisonous or nuisance vegetation or noxious weeds. Planted vegetation is sparse or bare or eroded patches occur in more than 10% of roof garden.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants.
5	Water Flow	Water stands in the green roof between storms and does not drain freely.
6	Erosion	Eroded or scoured areas due to wind or water.
7	Cover/Frame/Grate	N/A
8	Structure	Membrane or roof structure is compromised by either roots and/or water damage.
9	Damaged Pipes	N/A
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g., standing water for more than 72 hours in areas accessible to mosquitoes)
11	Other	Irrigation system leaking or malfunctioning.
12	Could Not Locate	Field inspectors are unable to locate the facility.

## Infiltration Trenches

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Two inches or more of accumulated sediment. Percolation test indicates infiltration rate is less than 90% of design capacity. Inlet pipe is clogged with sediment.
2	Trash & Debris	Trash or debris impeding water flow. Visual evidence of dumping. Inlet pipe is clogged with trash and debris.
3	Vegetation	Poisonous or nuisance vegetation constituting a hazard to maintenance personnel or the public. Evidence of noxious weeds.
4	Water Quality	Evidence of oil, gasoline, contaminants, or other pollutants.
5	Water Flow	Little or no water visibly flows through trench during heavy rain storms.
6	Erosion	Erosion damage over 2 inches deep where cause is still present or there is potential for continued erosion.
7	Cover/Frame/Grate	N/A
8	Structure	N/A
9	Damaged Pipes	Protective coating is damaged or rust is causing more than 50% deterioration to any part of pipe. Any dent that decreases the flow area by more than 20% or puncture that impacts performance.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	
12	Could Not Locate	Field inspectors are unable to locate the trench.



## Sediment Control Structures

*Note: Manufacturer maintenance standards should supersede those shown below.*

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment depth on filters exceeds 1/4-inch. Sediment depth in vault exceeds 6-inches in first chamber. Drain pipes and/or clean-outs become full with sediment.
2	Trash & Debris	Trash and debris accumulated on compost filter bed. Drain pipes and/or clean-outs become full with trash or debris.
3	Vegetation	Root systems entering the structure.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants. Water flowing into the system during dry weather – report as potential illicit discharge concern.
5	Water Flow	Drawdown of water through the media takes longer than 1 hour and overflow occurs frequently. Flows do not properly enter filter cartridges.
6	Erosion	N/A
7	Cover/Frame/Grate	Cover is missing or only partially in place. One maintenance person cannot remove lid after applying normal lifting pressure. Locking mechanism cannot be opened by one maintenance person with proper tools. Bolts into frame have less than 1/2 inch of thread.
8	Structure	Cracks wider than 1/2-inch. Evidence of soil particles entering structure through cracks. The vault is not structurally sound. Baffles corroding, cracking, warping and/or showing signs of failure.
9	Damaged Pipes	Any part of the pipes that are crushed or damaged due to corrosion and/or settlement. Inlet piping damaged or broken and in need of repair.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	Ladder is corroded or deteriorated, not functioning properly, not securely attached to structural wall, missing rungs, has cracks and/or is misaligned.
12	Could Not Locate	Field inspectors are unable to locate the facility.

## Oil/Water Separators

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment depth in bottom of structure exceeds 6-inches.
2	Trash & Debris	Trash and debris accumulation in vault, or pipe inlet/outlet, floatables and non-floatables.
3	Vegetation	Root systems entering the structure.
4	Water Quality	Discharge shows obvious signs of poor water quality. Oil accumulations that exceed 1-inch at the surface of the water. Water flowing into the system during dry weather -- report as potential illicit discharge concern.
5	Water Flow	Water is not flowing properly through the facility.
6	Erosion	N/A
7	Cover/Frame/Grate	Cover is missing or only partially in place. One maintenance person cannot remove lid after applying normal lifting pressure. Locking mechanism cannot be opened by one maintenance person with proper tools. Bolts into frame have less than 1/2 inch of thread.
8	Structure	Cracks wider than 1/2-inch. Any evidence of soil entering the structure through cracks. The vault is not structurally sound. Baffles or walls corroding, cracking, warping and/or showing signs of failure.
9	Damaged Pipes	Inlet or outlet piping damaged or broken and in need of repair.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	Ladder is corroded or deteriorated, not functioning properly, not securely attached to structural wall, missing rungs, has cracks and/or is misaligned.
12	Could Not Locate	Field inspectors are unable to locate the facility.

## Ponds: Detention, Infiltration, Evaporation, Water Quality

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Inlet/Outlet pipe clogged with sediment. Sediment accumulation in pond bottom exceeds 6 inches or 10% of the designed pond depth unless otherwise specified.
2	Trash & Debris	Trash and debris exceeding 5 cubic feet (equivalent to one standard size garbage can) per 1,000 square feet of pond area. Visual evidence of dumping. Inlet/Outlet pipe clogged with trash or debris.
3	Vegetation	Poisonous or nuisance vegetation constituting a hazard to maintenance personnel or the public. Evidence of noxious weeds. Tree growth does not allow access or interferes with slope mowing, silt removal, vactoring, or equipment movements. Dead, diseased, or dying trees identified by a certified Arborist. Tree growth on berms over 4 feet high that may lead to piping and eventual berm failure. Tree growth on emergency spillways.
4	Water Quality	Prevalent and visible oil sheen. Evidence of oil, gasoline, contaminants or other pollutants.
5	Water Flow	First cell (if applicable) is empty, doesn't hold water.
6	Erosion	Erosion of the pond's side slopes exceeding 2 inches deep where there is potential for continued erosion. Scouring of the pond bottom exceeding 6-inches deep, or where continued erosion is prevalent.
7	Cover/Frame/Grate	See Control Structures for additional maintenance standards.
8	Structure	See Control Structures for additional maintenance standards. Liner is visible and has more than three 1/4-inch holes in it. Any part of the berm or emergency spillway that has settled 4 inches lower than the design elevation. Discernable water flow through pond berm. (Consult with Geotechnical Engineer to evaluate condition and recommend repair.) Emergency spillway: only one layer of rock exists above native soil in area five square feet or larger, or any exposure of native soil at the top of flow path of spillway. (Rip-rap on inside slopes need not be replaced.) Internal spillway not level.
9	Damaged Pipes	See Conveyance System standards for pipes and debris barriers/trash racks.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)

Maintenance Code	Type	Conditions When Maintenance Is Needed
11	Other	<p>Evidence of rodent holes or any evidence of water piping through dam or berm via rodent holes. (Consult with Geotechnical Engineer to evaluate condition and recommend repair.)</p> <p>Beaver dam within the pond, resulting in change or function of the facility.</p> <p>Insects such as wasps and hornets that interfere with maintenance activities.</p>
12	Could Not Locate	Field inspectors are unable to locate the pond.

## Sedimentation Manholes

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Accumulated sediment exceeding 12 inches or impeding flow from inlet or outlet pipes.
2	Trash & Debris	Accumulated trash or debris exceeding 12 inches or impeding flow from inlet or outlet pipes.
3	Vegetation	N/A
4	Water Quality	Discharge shows obvious signs of poor water quality. Water flowing into the system during dry weather – report as potential illicit discharge concern.
5	Water Flow	N/A
6	Erosion	N/A
7	Cover/Frame/Grate	Cover is missing or only partially in place. One maintenance person cannot remove lid after applying normal lifting pressure. Locking mechanism cannot be opened by one maintenance person with proper tools. Bolts into frame have less than 1/2 inch of thread.
8	Structure	Any openings or voids allowing material to be transported into facility. Cracks wider than 1/2-inch and any evidence of soil particles entering the structure through the cracks. Field inspector determined the vault is not structurally sound.
9	Damaged Pipes	Inlet or outlet piping damaged or broken and in need of repair.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	Ladder is unsafe due to missing rungs, misalignment, not securely attached to structure wall, rust, or cracks.
12	Could Not Locate	Field inspectors are unable to locate the facility.

### Swales: Biofiltration, Grassy, Infiltration

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment depth exceeds 2 inches. Inlet/outlet areas clogged with sediment.
2	Trash & Debris	Trash and debris accumulated in the swale. Inlet/outlet areas clogged with trash and debris.
3	Vegetation	Grass is sparse or bare or eroded patches occur in more than 10% of the bottom of the swale. Grass is taller than 10 inches. Nuisance weeds or other vegetation starting to take over. Excessive shading causing poor grass growth.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants. Water flowing through facility during dry weather – report as potential illicit discharge concern.
5	Water Flow	Standing water in swale between storms does not drain freely. Flow spreader uneven or clogged where flows are not uniformly distributed through the swale.
6	Erosion	Small quantities of water continually flow causing an eroded, muddy channel at the bottom. Eroded or scoured grassy swale bottom due to flow channelization, or higher flows.
7	Cover/Frame/Grate	N/A
8	Structure	N/A
9	Damaged Pipes	See Conveyance System standards for pipes and debris barriers/trash racks.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	
12	Could Not Locate	Field inspectors are unable to locate the swale.

## Vaults, Tanks, and Storage Pipes

Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment depth exceeds 10% of diameter of storage area for half length of storage vault or any point depth exceeds 15% of diameter. (Example: 72-inch storage tank would require cleaning when sediment reaches depth of 7 inches for more than 1/2 length of tank.)
2	Trash & Debris	Trash or debris exceeds the limits for sediment described above.
3	Vegetation	N/A
4	Water Quality	Prevalent and visible oil sheen. Evidence of oil, gasoline, contaminants or other pollutants.
5	Water Flow	First cell (if applicable) is empty, doesn't hold water.
6	Erosion	N/A
7	Cover/Frame/Grate	Cover is missing or only partially in place. One maintenance person cannot remove lid after applying normal lifting pressure. Locking mechanism cannot be opened by one maintenance person with proper tools. Bolts into frame have less than 1/2 inch of thread.
8	Structure	See Control Structures for additional maintenance standards. Openings or voids between tank or pipe sections allowing material to be transported into facility. Tank/pipe is bent more than 10% of its design shape. Cracks wider than 1/2-inch. Evidence of soil particles entering structure through cracks. The vault is not structurally sound. One-half of the cross section of an air vent is blocked or vent is damaged.
9	Damaged Pipes	Inlet or outlet piping damaged or broken and in need of repair.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	Ladder is unsafe due to missing rungs, misalignment, not securely attached to structure wall, rust, or cracks.
12	Could Not Locate	Field inspectors are unable to locate the facility.

## Vegetated Filter Strips

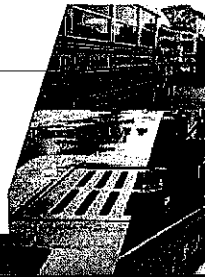
Maintenance Code	Type	Conditions When Maintenance Is Needed
1	Sediment	Sediment depth exceeds 2 inches.
2	Trash & Debris	Trash and debris accumulated on the filter strip.
3	Vegetation	Grass taller than 10-inches. Nuisance weeds or other vegetation starts to take over. Planted vegetation is sparse or bare or eroded patches occur in more than 10% of the filter strip area.
4	Water Quality	Any evidence of oil, gasoline, contaminants or other pollutants. Water flowing through facility during dry weather – report as potential illicit discharge concern.
5	Water Flow	Visual evidence of water discharging at concentrated points (rather than sheet flow) onto the filter strip.
6	Erosion	Eroded or scoured areas due to flow channelization or higher flows.
7	Cover/Frame/Grate	N/A
8	Structure	Flow spreader uneven or clogged so that flows are not uniformly distributed through filter width.
9	Damaged Pipes	See Conveyance System standards for pipes and debris barriers/trash racks.
10	Mosquito Vector Breeding	Suitable habitat exists for mosquito production (e.g. standing water for more than 72 hours in areas accessible to mosquitoes.)
11	Other	
12	Could Not Locate	Field inspectors are unable to locate the filter strip.





## Spill Prevention and Control Training Program

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## Spill Prevention, Control, and Countermeasure Plans

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- SPCC plans are required at facilities with oil storage capacity greater than 1320 gallons in containers or tanks of 55 gallons or more.
- Plan identifies areas in a facility where spills may occur.
- Plan includes actions to prevent spills and measures to minimize spills.

## SPCC Plan Measures

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- Facility diagram showing locations and amounts of oil storage
- Secondary containment (Tanks AND Drums)
- Inspections and tests
- Security
- Tank loading and unloading procedures
- Product transfer
- Spill Response



## Secondary Containment

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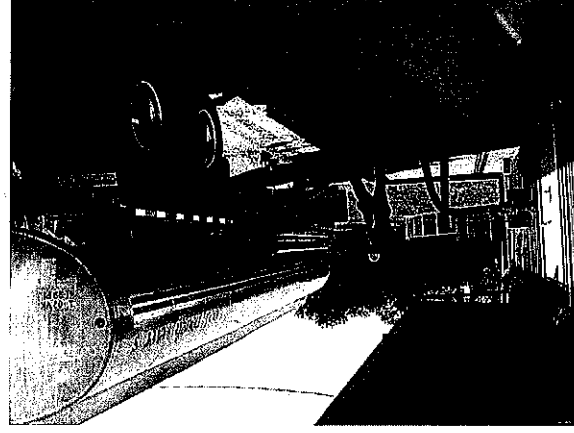
- Secondary containment required for all oil storage in containers/tanks of 55 gallons or more (> largest container).
- Plan verifies presence of secondary containment for ASTs.
- Secondary containment must be kept free of product, solid materials, and precipitation.
- Storm water released from dike area is inspected and sampled prior to disposal and records kept of drainage events.

## Security

SPCC Plan states that lighting is maintained during hours of darkness.

Lighting is important:

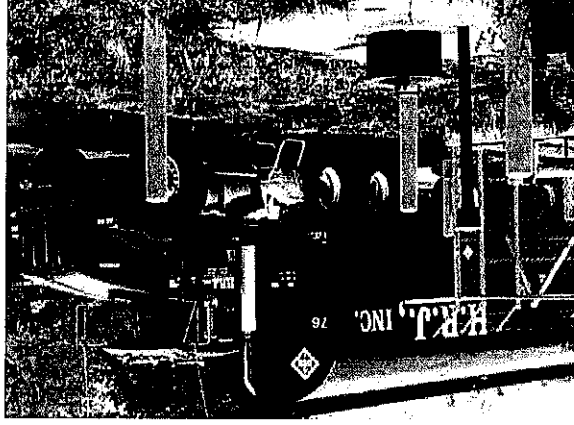
- Discovery of spills
- Response to spills
- Discourage acts of vandalism



Contractor doing his job properly

## Unloading/Loading Procedures

- ✓ Verify tank trailer positioned at the proper loading/unloading spot.
- ✓ Tank trailer brakes should be set and wheels chocked to ensure that the truck will not move.
- ✓ Visually inspect the AST and reliably determine the quantity of product in the AST.
- ✓ Ensure no ignition sources are present.



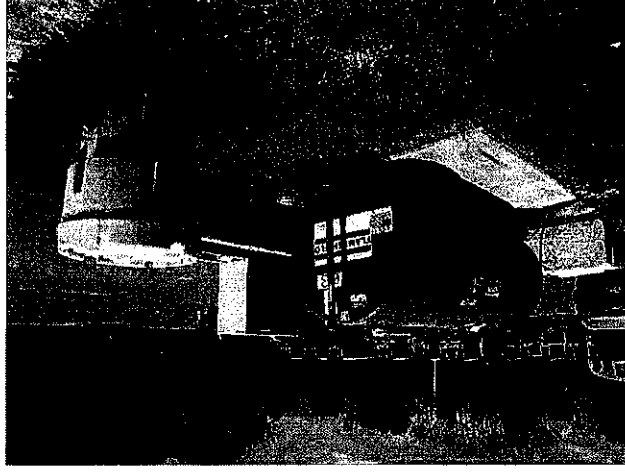
Contractor **NOT** doing his job properly

## Fueling Procedures

- ✓ Only perform fueling in designated areas.
- ✓ Make sure that spill response supplies are readily available.
- ✓ Fueling equipment should be maintained so that it does not leak during normal operations.
- ✓ Report alarms indicating oil/water separator and/or used oil tank are reaching capacity.

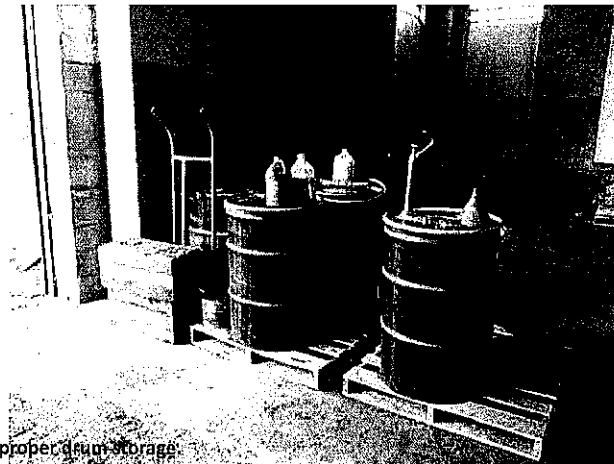
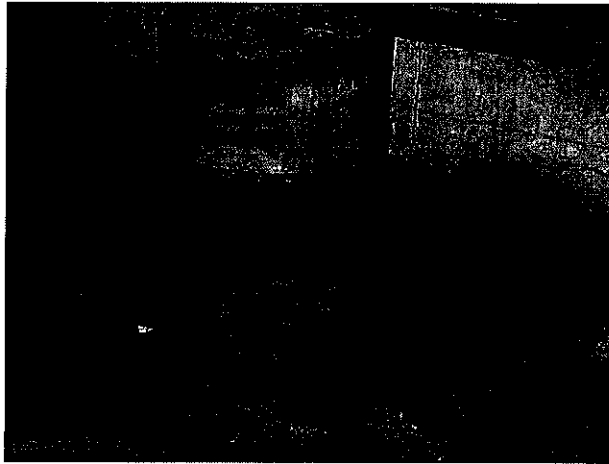
## Inspections

- Formal inspections conducted and documented regularly.
- Employees perform informal inspections on a daily basis. Issues should be reported to Supervisors.
- Informal inspections cover:
  - Storage conditions and practices
  - Leaks and spills
  - Loading/unloading
  - Locomotive fueling
  - Materials/water in diked or contained areas
  - Corrosion on tanks or piping
  - Any unusual occurrences

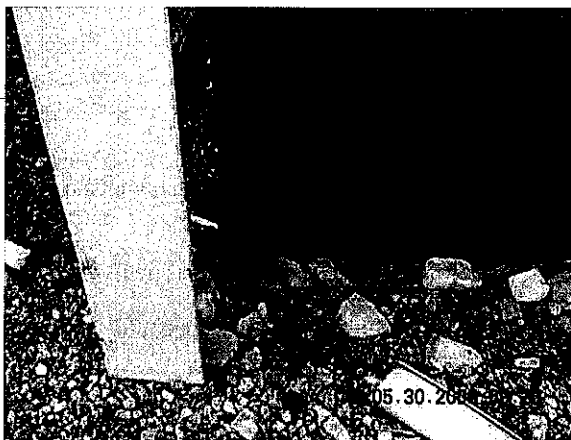


## Other Requirements

- Vehicle Protection**
- ASTs, piping, and product transfer / dispenser systems protected against vehicular impact
- Labeling**
- Name of product on two sides of the tank visible from 15 feet or from outside of the dike
- On larger tanks



Improper drum storage



Corroded container.



Secondary containment filled with stormwater.

## Spill Response Training



## Training Objectives

- Spill response procedures
- Spill response equipment
- Disposal procedures for spill response materials



The objective of this training session is to learn about

Leaking AST, in need of paint.



**IMPORTANT!**



- Only store oil in designated areas with appropriate secondary containment.
- Ensure that contractors transferring materials are doing their jobs.
- Inform members of the Pollution Prevention Team of changes that could impact oil storage.

## Definition of a Spill

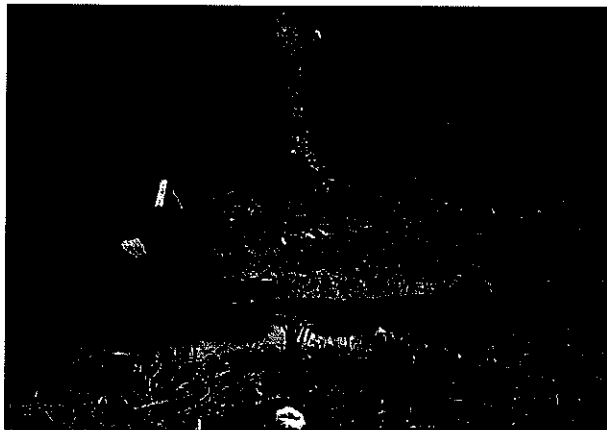
A "spill" is any oil or petroleum products, chemicals, wastes or other materials that are released in any manner, which may have negative impacts on the environment or on human health and safety.

*Examples:*

- An overflow of diesel fuel onto the ground
- Spill of oil from a ruptured hydraulic line
- Pouring lube oil on the track after machine repair
- A leak from a stored drum



Improper waste storage causes soil contamination



Soil and stream contamination by oil

## What to do when a spill occurs?

Assess situation based on the following questions:

- What kind of material is spilled?
- How extensive is the spill?
- What hazards does it represent?
- Are there water courses, drains, roads, residential areas, potable water sources nearby?
- Are these down-gradient from the spill?



## Who will cleanup the spill?

Small spills that will not result in contamination of the environment can be cleaned up by facility personnel. In cases of major environmental incidents, all spill cleanup, restoration, and decontamination is performed primarily by specially-trained contractors.

Employees may be involved as support personnel.

## Types of Spills That Can Cleaned Up By On-Site Personnel

- Minor spills that can be controlled to prevent any threat to the environment.
- For all spills larger than 10 gallons OR that reach the environment, the Environmental Compliance Manager must be notified in order to meet applicable reporting requirements.
- Any amount of oil that reaches or will discharge to a surface water causing a sheen is reportable!



## Cleanup Measures For Minor Spills

- ✓ Put on appropriate emergency protective clothing and safety equipment prior to completing physical spill control activities.
- ✓ Prevent further spillage.
- ✓ Attempt to control the spilled substance utilizing appropriate diking, curbing, or absorbent materials.



## Examples of Spills That Are Not Minor

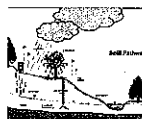
- Release of one drum of diesel fuel into the environment.
- Release of a carload of salt into a waterway.
- Spill from storage tanks on to ground surface.





## Initial Spill Response – Safety Measures

- ✓ Clear area of all non-essential personnel.
- ✓ Stay up wind of the spill to avoid breathing vapors.
- ✓ Prevent access to the area.
- ✓ Eliminate all existing or potential ignition sources.



## Initial Spill Response – Mitigation Measures

- ✓ Block off all floor drains, storm sewers, and manholes located within or near the spill area.
- ✓ Utilize appropriate diversionary structures or equipment to prevent contamination of any land or water environments.



## Internal/External Notification

Contact the General Manager or Maintenance Lead

General Manager will notify the Environmental Compliance Manager.

All notification of regulatory agencies will be performed by the Environmental Compliance Manager.

## Initial Spill Response



- Common sense should be exercised in responding to all spills.
- Order of initial response actions may vary depending on the nature of the accident.

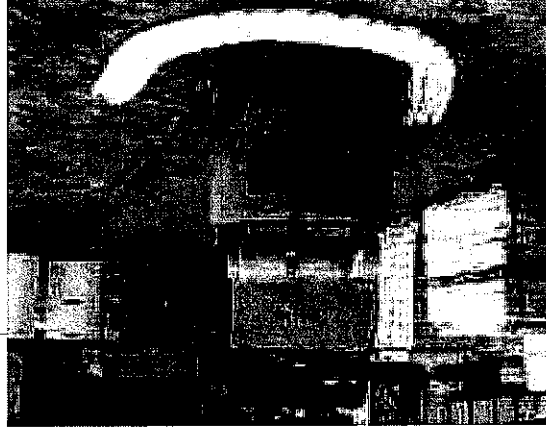


*The health and safety of all employees and the public is the number one priority when dealing with spills!!*

Granular sorbent should be spread over the spilled liquid. The soiled sorbent should be collected and disposed of along with other materials contaminated by the spill.



Polypropylene booms used to contain spill around leaking equipment



Absorbent booms and pads used to intercept spilled oil. Polypropylene booms and pads can be used to contain spills on water, since they float and do not absorb water.



Polypropylene booms used to contain spill from leaking drums



## Cleanup Measures For Minor Spills



- ✓ Recover any liquid material, if possible.
- ✓ Contain and absorb spillage with absorbent material contained in spill kit.
- ✓ Shovel into open-top containers.
- ✓ Cover and label containers; seal when full.
- ✓ Remove and decontaminate all equipment used.
- ✓ Dispose of waste materials in accordance with applicable laws.

## Spill Control of a Liquid Product: Tools and Techniques

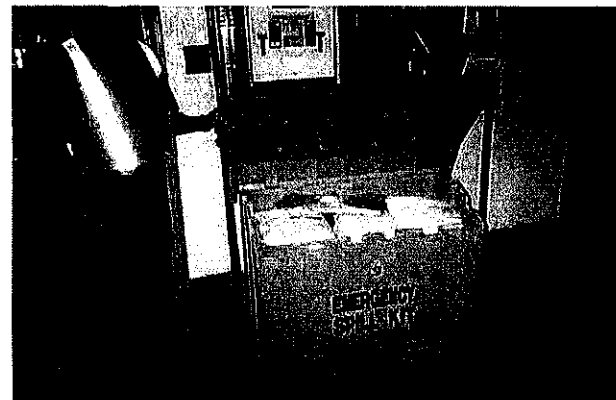
Spill response kits:

- 1) A mobile kit in a nylon bag for vehicles
- 2) A large facility kit in a plastic container
- 3) A battery spill kit



## Spill Response Kit Contents

- Neoprene mat (manhole cover)
- Epoxy sticks
- Polypropylene booms
- Polypropylene sorbent pads
- Universal granular sorbent
- Plastic disposal bag
- Personal protective equipment, etc.



Spill response kit

## IMPORTANT!



- DO NOT assume that a spill will be cleaned up by others!
- The longer a spill is left unaddressed the more difficult (and costly) it is to clean up.
- Determine the cause of a spill and fix it.
- Don't forget to restock depleted spill supplies following a response action!!

## Disposal Procedures for Spill Materials

- Liquids, solids, and used absorbent require special disposal as determined by the Environmental Compliance Manager.
- All tools or equipment should be decontaminated by a method approved by the Environmental Compliance Manager.

## Final Thoughts...

*Good housekeeping conducted on a daily basis is the best method for reducing negative impacts to the environment.*

*All employees should look for potential problems and report them to supervisors and the Environmental Compliance Manager.*



*Improper storage of spill cleanup materials.*

# Appendix I

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



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

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

## I. TMDL AND MS4 COVERAGE

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

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

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

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

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

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

Gibraltar	Trenton
Riverview	Wayne County
Romulus	Woodhaven
Taylor	

C. *Sediment in Frank and Poet Drain*

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

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

Gibraltar	Taylor
Riverview	Trenton
Romulus	Wayne County
Southgate	Woodhaven

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

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

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

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

Flat Rock	Wayne County
Gibraltar	Woodhaven
Rockwood	

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

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

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

## II. PRIORITIZING AND IMPLEMENTATION BMPS

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

details, or in Appendix B for example).

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

### III. MONITORING PLAN

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

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



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

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

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

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

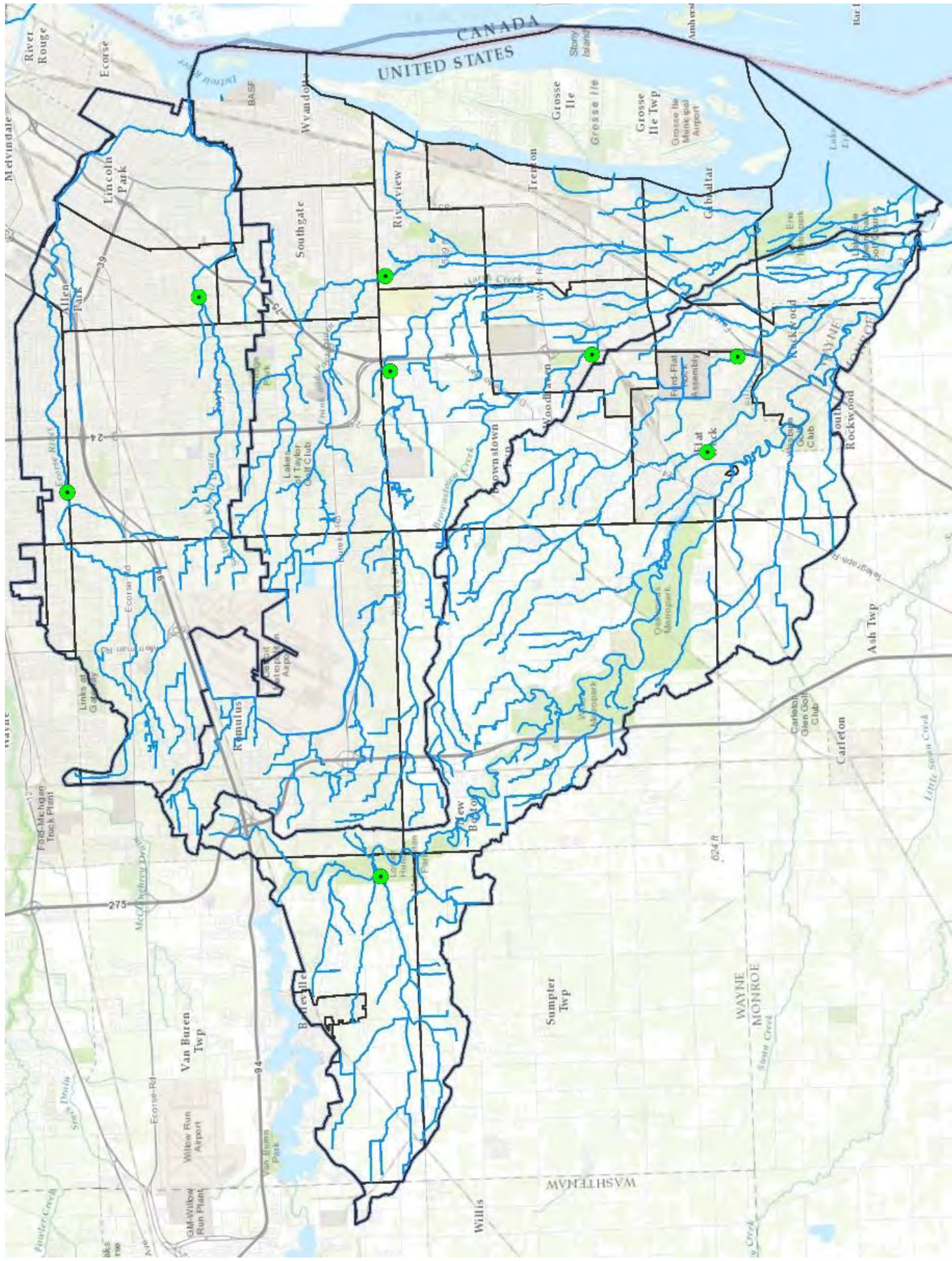
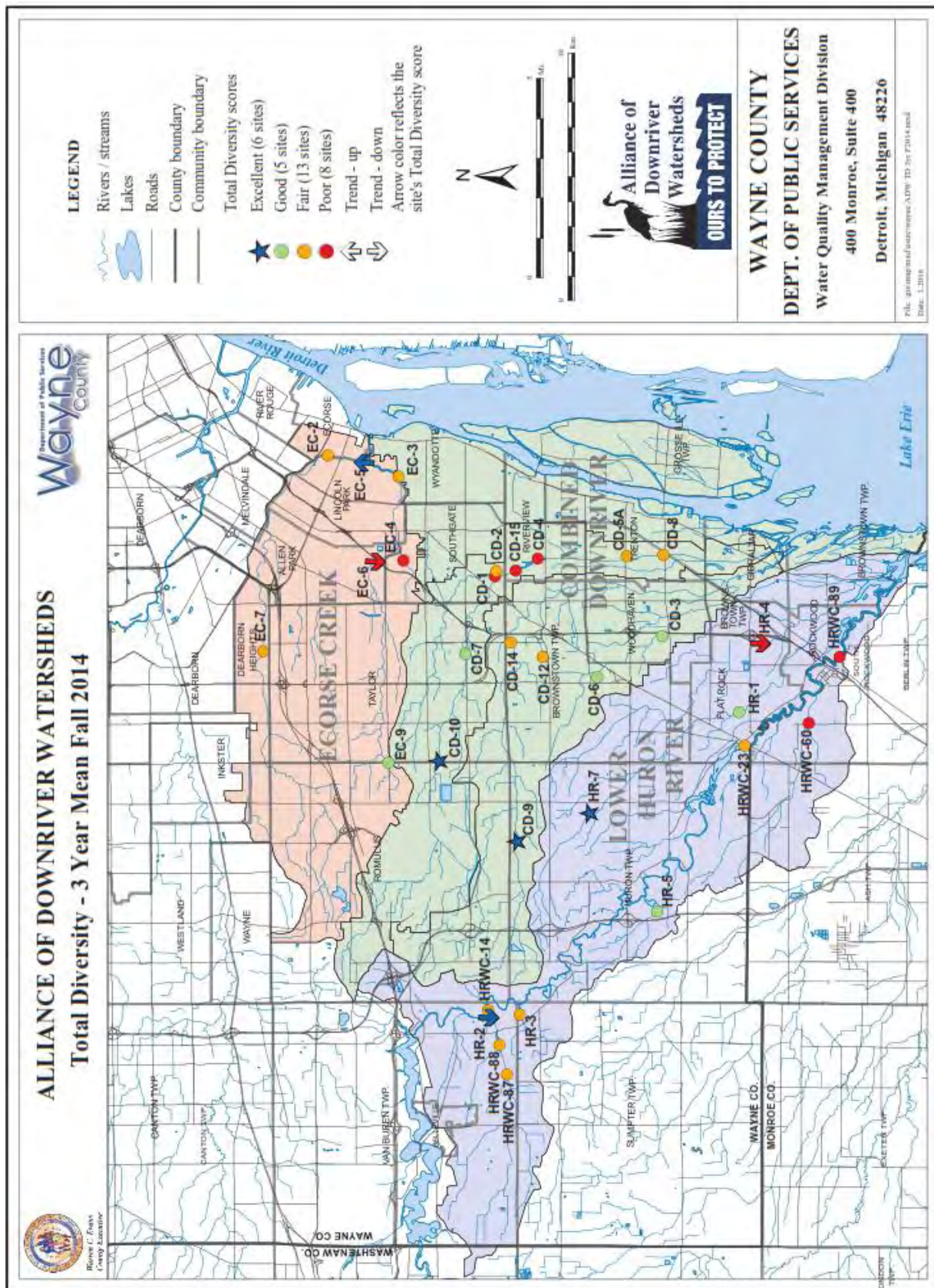


Figure 1. Long-term water quality monitoring stations in the Alliance of Downriver Watersheds





## 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.

### WOODHAVEN BROWNSTOWN SCHOOL DISTRICT

Section*	SWMP Actions for WOODHAVEN BROWNSTOWN SCHOOL DISTRICT	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 &amp; Data Collection</i>	L	H
IDEP	<i>Illegal Dumping/Spill Response &amp; Database</i>	G	G
IDEP	<i>Environmental reporting line / Tracking</i>	G	G
IDEP	<i>Time of Sale &amp; Field Inspections</i>		H
IDEP	<i>Pollution Prevention (P2) Program</i>	L	H
IDEP	<i>Staff Training</i>	L	H
IDEP	<i>Dye Testing</i>	L	H
SESC	<i>Soil Erosion and Sedimentation Control (SESC) Programs</i>	H	L
SESC	<i>SESC Inspections</i>	H	L
SESC	<i>Discharge notifications</i>	H	H
SESC	<i>State of Michigan – Permit-by-Rule Notification</i>	H	H
PCSW	<i>Require PCSW controls within jurisdiction on both public and private developments</i>	H	G

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

Section*	SWMP Actions for WOODHAVEN BROWNSTOWN SCHOOL DISTRICT	Biota (Flow, sedimentation) TMDL	Bacteria (E.coli) TMDL
P2GH	<i>Municipal Facility &amp; Structural Stormwater Control Inventory</i>	G	G
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 &amp; 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
PCSW	Post-Construction Stormwater Runoff Program
P2GH	Pollution Prevention and Good Housekeeping

**PERMIT NO. MI0060064**



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

**AUTHORIZATION TO DISCHARGE UNDER THE  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

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

**Woodhaven-Brownstown School District**  
24975 Van Horn Road  
Flat Rock, MI 48134

is authorized to discharge from the Municipal Separate Storm Sewer System (MS4)

designated as **Woodhvn-Brownstwn PS MS4-Wayne**

to surface waters of the state of Michigan in accordance with effluent limitations, monitoring requirements, and other conditions set forth in this permit.

**This permit takes effect on August 1, 2021.** This permit is based on a complete application submitted on March 11, 2008, as amended through January 11, 2021.

The provisions of this permit are severable. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term in accordance with applicable laws and rules. On its effective date this permit shall supersede Certificate of Coverage No. MIG610359, issued on December 19, 2003, which is hereby revoked upon the effective date of this permit.

This permit and the authorization to discharge shall expire at midnight, **October 1, 2024**. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit an application which contains such information, forms, and fees as are required by the Department of Environment, Great Lakes, and Energy (Department) by **April 4, 2024**.

**Issued:** July 30, 2021.

Original signed by Christine Alexander  
Christine Alexander, Manager  
Permits Section  
Water Resources Division

## PERMIT FEE REQUIREMENTS

In accordance with Section 324.3118 of the NREPA, the permittee shall make payment of an annual storm water fee to the Department for each January 1 the permit is in effect regardless of occurrence of discharge. The permittee shall submit the fee in response to the Department's annual notice. Payment may be made electronically via the Department's MiWaters system. The MiWaters website is located at <https://miwaters.deq.state.mi.us>. Payment shall be submitted or postmarked by March 15 for notices mailed by February 1. Payment shall be submitted or postmarked no later than 45 days after receiving the notice for notices mailed after February 1.

**Annual Permit Fee Classification:** Municipal Storm Water – Institution

## CONTACT INFORMATION

Unless specified otherwise, all contact with the Department required by this permit shall be made to the Warren District Office of the Water Resources Division. The Warren District Office is located at 27700 Donald Court, Warren, MI 48092-2793, Telephone: 586-753-3700, Fax: 586-751-4690.

## CONTESTED CASE INFORMATION

Any person who is aggrieved by this permit may file a sworn petition with the Michigan Administrative Hearing System within the Michigan Department of Licensing and Regulatory Affairs, c/o the Michigan Department of Environment, Great Lakes, and Energy, setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Department of Licensing and Regulatory Affairs may reject any petition filed more than 60 days after issuance as being untimely.



**PART I****Section A. Limitations and Monitoring Requirements****1. Authorized Discharges**

- a. **Authorized Outfalls and Points of Discharge**  
This permit authorizes the discharge of storm water from the permittee's MS4 to the surface waters of the state via the outfalls and points of discharge identified in the permittee's application and as modified in accordance with this permit. Such discharges shall be controlled and monitored by the permittee in accordance with this permit.
- b. **Nested MS4 Discharges**  
This permit authorizes the discharge of storm water to surface waters of the state from a nested MS4 owned or operated by public bodies that include, but are not limited to, public school districts; public universities; airports; or county, state, or federal agencies. The permittee may request to modify permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.
- c. **Discharges Authorized Under Other National Pollutant Discharge Elimination System (NPDES) Permits**  
This permit does not prohibit the use of an MS4 for other discharges authorized under other NPDES permits, or equivalent Department approval under the NREPA or the Federal Act.
- d. **Water Quality Requirements**  
Discharges from the permittee's MS4 shall not cause or contribute to an exceedance of water quality standards in the receiving waters. This includes, but is not limited to, the requirement set forth in R 323.1050 of the Water Quality Standards stating that the receiving waters shall not have any of the following unnatural physical properties as a result of the discharge, in quantities which are or may become injurious to any designated use: turbidity, color, oil films, floating solids, foams, settleable solids, suspended solids, or deposits.

**2. Outfall or Point of Discharge Identified, Constructed, or Installed After Permit Issuance**

- a. **Outfall or Point of Discharge Within the Permittee's Regulated Area**  
Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located within the permittee's regulated area as identified in the application. For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:
  - 1) whether the discharge is from an outfall or point of discharge;
  - 2) the outfall or point of discharge identification number assigned by the permittee;
  - 3) the surface water of the state receiving the discharge from the outfall or point of discharge;
  - 4) a certification statement that the outfall or point of discharge is within the permittee's regulated area as identified in the application;
  - 5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes best management practices (BMPs) to comply with the minimum requirements of the permit for the outfall or point of discharge; and

**PART I****Section A. Limitations and Monitoring Requirements**

- 6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map required in Part I.A.3.d.1) of this permit.
- b. **Outfall or Point of Discharge Outside the Permittee's Regulated Area**  
Authorization from the Department is required to discharge storm water to a surface water of the state from a permittee owned or operated outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit and located outside the permittee's regulated area as identified in the application (e.g., area served by an expanded MS4 or area previously served by a combined sewer system that is now separated). For each outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit, the permittee shall request authorization to discharge storm water by providing the following to the Department in a written request:
- 1) whether the discharge is from an outfall or point of discharge;
  - 2) the outfall or point of discharge identification number assigned by the permittee;
  - 3) the surface water of the state receiving the discharge from the outfall or point of discharge;
  - 4) a map identifying the expanded regulated area served by the permittee's MS4;
- 5) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) includes BMPs to comply with the minimum requirements of the permit for the outfall or point of discharge and expanded regulated area; and
- 6) a certification statement that the previously approved Storm Water Management Program (Part I.A.3. of this permit) is being implemented in the expanded regulated area served by the outfall or point of discharge, including having available an up-to-date storm sewer system map as required in Part I.A.3.d.1) of this permit.
- c. Upon review of the request to authorize the discharge from an outfall or point of discharge identified, constructed, or installed after issuance but during the term of this permit in accordance with Part I.A.2.a. or Part I.A.2.b. of this permit, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required.

**3. Storm Water Management Program (SWMP)**

The permittee submitted a SWMP with its application for an NPDES permit. The SWMP is approved as submitted. The permittee shall implement the approved SWMP to comply with the minimum requirements identified in this permit. The SWMP shall cover the regulated area served by, or otherwise contributing to discharges from, the MS4 owned or operated by the permittee identified in the application. The permittee shall implement and enforce the SWMP to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the NREPA and the Federal Act. The approved SWMP is an enforceable part of this permit and any Department approved modifications made to the SWMP shall also become enforceable parts of this permit.

- a. **Enforcement Response Procedure (ERP)**  
The permittee shall implement the ERP for violations of the permittee's ordinances or regulatory mechanisms identified in the SWMP to the maximum extent practicable. The ERP shall be implemented to compel compliance with the permittee's ordinances and/or regulatory mechanisms and to deter continuing violations.

## PART I

### Section A. Limitations and Monitoring Requirements

The permittee shall track and document all enforcement conducted pursuant to the permittee's ERP. At a minimum, the permittee shall track and document the following: the name of the person responsible for violating the permittee's ordinance or regulatory mechanism; the date and location of the violation; a description of the violation; a description of the enforcement response used; a schedule for returning to compliance; and the date the violation was resolved.

b. **Public Participation/Involvement Program (PPP)**

The permittee shall implement the PPP to encourage public participation/involvement in the implementation and periodic review of the SWMP to the maximum extent practicable. The permittee shall implement the PPP as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PPP or part of the PPP, therefore each permittee working collaboratively is responsible for complying with the PPP as described in the SWMP.

The PPP requires implementation of the following minimum requirements:

- 1) The procedure for making the SWMP available for public inspection and comment, including complying with local public notice requirements, as appropriate; and
- 2) The procedure for inviting public participation and involvement in the implementation and periodic review of the SWMP.

c. **Public Education Program (PEP)**

The permittee shall implement the PEP as part of the SWMP to the maximum extent practicable. At the minimum, the PEP shall promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water runoff. The PEP shall be implemented to achieve measurable improvements in the public's understanding of storm water pollution and efforts to reduce the impacts of storm water pollution. The permittee has chosen to work collaboratively with watershed or regional partners to implement the PEP or part of the PEP, therefore each permittee working collaboratively is responsible for complying with the PEP as described in the SWMP.

The permittee shall implement the PEP in accordance with the procedure for prioritizing the following PEP topics based on high-priority, community-wide issues and targeted issues to reduce pollutant loads to storm water to the maximum extent practicable.

The PEP requires implementation of the following minimum requirements:

- 1) BMPs to address the following PEP topics:
  - (a) Promote public responsibility and stewardship in the permittee's watershed.
  - (b) Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges can have on surface waters of the state.
  - (c) Educate the public on illicit discharges and promote public reporting on illicit discharges and improper disposal of materials into the MS4.
  - (d) Promote preferred cleaning materials and procedures for car, pavement, and power washing.
  - (e) Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.
  - (f) Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.

**PART I****Section A. Limitations and Monitoring Requirements**

- (g) Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids.
- (h) Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.
- (i) Educate the public on, and promote the benefits of, green infrastructure and Low Impact Development.
- (j) Promote methods for managing riparian lands to protect water quality.
- (k) Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to storm water runoff.

2) The procedure for determining the overall effectiveness of implementation and the process for modifying the PEP to address ineffective implementation. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the PEP. The Department will notify the permittee if a modification is required.

d. **Illicit Discharge Elimination Program (IDEP)**

The permittee shall implement and enforce the IDEP to detect and eliminate illicit discharges and connections to the permittee's MS4. The permittee shall implement the IDEP as part of the SWMP to the maximum extent practicable. The permittee has chosen to work collaboratively with watershed or regional partners to implement the IDEP or part of the IDEP, therefore each permittee working collaboratively is responsible for complying with the IDEP as described in the SWMP.

The IDEP requires implementation of the following minimum requirements:

1) An available, up-to-date storm sewer system map identifying the following: the storm sewer system, location of all outfalls and points of discharge the permittee owns or operates in the regulated area, and the names and location of all surface waters of the state that receive discharges from the permittee's MS4. The map shall be retained by the permittee and made available to the Department upon request. The map shall be maintained and updated as outfalls and points of discharge are identified, constructed, and installed in accordance with Part I.A.2. of this permit.

2) The plan to detect and eliminate non-storm water discharges to the permittee's MS4, including illegal dumping/spills. The plan includes the following:

- a) A procedure for identifying priority areas for field observations. The permittee shall conduct field observations in accordance with the procedure identifying the priority area(s) developed as part of the IDEP.
- b) A procedure for conducting field observations, field screening, and source investigations. The permittee shall conduct a field observation in accordance with the procedure during dry-weather at least once during the term of the permit. Field screening and source investigation shall be conducted in accordance with the schedule in the procedure.

Field observations, field screening, and source investigations shall include the following:

(1) **Field Observation** – The permittee shall observe the outfall or point of discharge for the following during dry-weather in accordance with the procedure: presence/absence of flow, water clarity, color, odor, floatable materials, deposits/stains on the discharge structure and bank, vegetation condition, structural condition, and biology (e.g. bacterial sheens, algae, and slimes).

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### Section A. Limitations and Monitoring Requirements

(2) Field Screening – If flow is observed at an outfall or point of discharge, the permittee shall analyze the flow for the indicator parameters identified in the procedure. If the source of an illicit discharge is identified during the field observation, field screening may not be necessary.

(3) Source Investigation – If the source of the illicit discharge was not identified by the field screening, the permittee shall conduct an investigation to identify the source in accordance with the procedure. If the permittee opts to use tracer dyes, the discharge of the dyes shall be authorized in accordance with Part I.A.6. of this permit.

If the permittee is made aware of non-storm water discharges outside the priority areas, illegal dumping/spills, or complaints received, the permittee shall conduct field observations and follow-up field screening and source investigations as appropriate in accordance with the procedure, including the schedule, in the IDEP. The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state in accordance with Part II.C.7. of this permit.

c) A procedure for responding to illicit discharges and pursuing enforcement action. The permittee shall implement the procedure to respond and pursue enforcement action once the source of the illicit discharge is identified, including the corrective action required to eliminate the illicit discharge. The permittee shall also implement the procedure to respond to illegal spills/dumping. For each illicit discharge not eliminated within 90 days of its discovery, the permittee shall provide, with the next progress report due, a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.

3) The employee training program, which includes the following:

- a) Training on techniques for identifying illicit discharges and connections, including field observations, field screening, and source investigations;
- b) Training on procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response; and
- c) A schedule and requirement for training at least once during the term of the permit for existing staff and within the first year of hire for new staff.

4) The procedure for IDEP evaluation and determining the overall effectiveness of the IDEP.

e. Construction Storm Water Runoff Control Program

The permittee shall implement the construction storm water runoff control program to address areas of construction activity that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale. The permittee shall implement the construction storm water runoff control program as part of the SWMP to the maximum extent practicable.

The construction storm water runoff control program requires implementation of the following minimum requirements:

1) The procedure to notify the Part 91 Agency, or appropriate staff (if the permittee is a Part 91 Agency), when soil or sediment is discharged to the permittee's MS4 from a construction activity.

2) The procedure to notify the Department when soil, sediment, or other pollutants are discharged to the permittee's MS4 from a construction activity.

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### Section A. Limitations and Monitoring Requirements

3) The procedure for ensuring that construction activity one (1) acre or greater in total earth disturbance with the potential to discharge to the permittee's MS4 obtains a Part 91 permit or is conducted by an approved Authorized Public Agency, as appropriate.

4) The procedure to advise the landowner or recorded easement holder of the State of Michigan Permit by Rule (R 323.2190 of the Part 21 Rules promulgated pursuant to Part 31 of the NREPA).

f. Post-Construction Storm Water Runoff Program

The permittee shall implement and enforce the program to address post-construction storm water runoff from new development and redevelopment projects that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale, and that discharge into the permittee's MS4. The permittee shall implement and enforce the post-construction storm water control program as part of the SWMP, to the maximum extent practicable and in accordance with the approved ordinance or regulatory mechanism.

1) On or before September 1, 2021, the permittee shall submit to the Department for review a draft Post-Construction Storm Water Control regulatory mechanism. On or before December 1, 2021, the permittee shall submit to the Department for approval an in-effect Post-Construction Storm Water Control regulatory mechanism to achieve the post-construction storm water runoff performance standards set forth in a) and b) below at the project site (including projects where the permittee is the project developer). Upon Department approval of the ordinance, the permittee shall implement and enforce the ordinance requiring implementation of BMPs by the project developer (including the permittee if the permittee is the project developer) to achieve the post-construction storm water runoff performance standards at the project site to the maximum extent practicable.

a) Water Quality Control (WQC) Performance Standard

Treat the post-development runoff volume generated from a 1.0-inch rainfall event. BMPs shall be designed on a site-specific basis to achieve a minimum of 80 percent removal of total suspended solids (TSS) as compared with uncontrolled runoff or a discharge concentration of TSS not to exceed 80 milligrams per liter (mg/l).

b) Channel Protection Control Performance Standard (CPC)

The CPC shall be implemented to limit the surface runoff rate and volume at the project site to maintain or restore stable hydrology in receiving waters. An alternative CPC was approved as part of the SWMP. The alternative CPC requires implementation of the following at the project site to the maximum extent practicable:

- Channel Protection Volume Control (CPVC): Retain onsite the post-development runoff volume from a 1.0-inch rainfall event, and
- Channel Protection Rate Control (CPRC): Provide extended detention for the post-development runoff volume from a 1.9-inch rainfall event.

On or before April 1, 2022 and on or before April 1 of every year following, as part of the approved alternative, the permittee shall submit an annual report to the Department for the previous calendar year documenting the results of implementing the alternative CPC in the regulated area. The annual report shall tabulate the following for each development or redevelopment project (including projects where the permittee is the project developer) and provide an overall summary for each reporting line:

- (1) Change in impervious area, pervious area by cover type, and total area by site.
- (2) CPVC volume provided at the site.
- (3) Difference between required and provided CPVC volume by site.

**PART I****Section A. Limitations and Monitoring Requirements**

- (4) Percent of site in each Hydrologic Soil Group (Type A, B, C, D).
- (5) Site location in geographic information system (GIS) polygon format, or an approved alternative format.
- (6) Site outfalls and points of discharge in GIS point format, or an approved alternative format.
- (7) Site MS4 outfall drainage area in GIS polygon format, or an approved alternative format, including any offsite drainage that passes through the outfall or points of discharge.
- (8) CPRC volume provided at the site.
- (9) Difference between required and provided CPRC volume by site.
- (10) CPVC volume required for each primary road project with receiving water of the state identified.
- (11) Cumulative CPVC volume provided for all new development and redevelopment projects discharging to the same receiving water of the state with a road project(s) starting December 1, 2021.

The permittee shall submit documentation to support implementation of the alternative CPC upon request. The alternative CPC approval is limited to the permit term. The results from the annual reports will be evaluated as part of permit reissuance using methods agreed to by the permittee and Department, which may result in an updated alternative CPC.

- 2) The permittee shall implement and enforce the following site-specific requirements as part of meeting the post-construction storm water runoff performance standards set forth in a) and b), above:
  - a) The procedure for reviewing the use of infiltration BMPs to achieve the performance standards in areas of soil or groundwater contamination in a manner that does not exacerbate existing conditions.
  - b) The ordinance or regulatory mechanism requiring BMPs to address the associated pollutants in potential hot spots as part of meeting the performance standards. Hot spots include areas with the potential for significant pollutant loading including, but not limited to, the following: gas stations; vehicle maintenance and repair; auto recyclers; recycling centers and scrap yards; landfills; solid waste facilities; and railroads. Hot spots also include areas with the potential for contaminating public water supply intakes.
- 3) All structural and vegetative BMPs installed and implemented to meet the performance standards shall be operated and maintained in perpetuity. The permittee shall implement and enforce the ordinance or regulatory mechanism program to ensure long-term operation and maintenance of BMPs.
- 4) The ordinance or regulatory mechanism and procedures for site plan review and approval for projects that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale, and discharge to the permittee's MS4, including projects where the permittee is the developer. The site plan review and approval shall demonstrate compliance with the performance standards and long-term operation and maintenance requirements of this permit.

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### Section A. Limitations and Monitoring Requirements

g. Pollution Prevention and Good Housekeeping Activities for Municipal Operations

The permittee shall implement the pollution prevention and good housekeeping program with the goal of preventing or reducing pollutant runoff from municipal facilities and operations that discharge storm water to surface waters of the state. The permittee shall implement the program as part of the SWMP to the maximum extent practicable.

1) Municipal Facility and Structural Storm Water Control Inventory

The permittee shall make available to the Department upon request an up-to-date map or maps of the facilities and structural storm water controls owned or operated by the permittee with a discharge to surface waters of the state in the regulated area. In accordance with the procedure for updating and revising the permittee's facility inventory and map(s), the permittee shall submit to the Department the type and location for any new facility obtained or constructed during this permit term with a discharge of storm water to surface waters of the state and the information requested in Part I.A.2. of the permit.

2) Facility-Specific Storm Water Management

The permittee shall implement the facility-specific standard operating procedure (SOP) for each facility the permittee identified as having the high potential to discharge pollutants to surface waters of the state. The permittee shall implement the BMPs identified in the procedure to prevent or reduce pollutant runoff at each facility the permittee identified as having the medium or low potential to discharge pollutants to surface waters of the state. The permittee shall assess new facilities for the potential to discharge pollutants to surface waters of the state in accordance with the procedure to determine a priority level. High-priority facilities shall include permittee-owned or operated fleet maintenance and storage yards unless a demonstration is submitted and approved by the Department demonstrating how the permittee's fleet maintenance or storage yard has the low potential to discharge pollutants to surface waters of the state. The assessment shall be submitted in writing to the Department for approval within 30 days of ownership or operation of the new facility. The permittee shall certify in writing to the Department that a facility-specific SOP is being implemented within 90 days of ownership or operation of a new high-priority facility. Within 90 days of ownership or operation, the permittee shall certify in writing to the Department that BMPs are being implemented in accordance with the procedure developed to prevent or reduce pollutant runoff at each new medium- or low-priority facility. For new facilities, the Department may determine that a permit modification is required, after opportunity for public comment. The Department will notify the permittee if a modification is required. The permittee shall document all other changes to the facility assessment as part of the progress report and as an update to the procedure.

The facility-specific SOP shall be kept at the site described in the SOP and made available upon request by the Department. The facility-specific SOP for each high-priority facility shall include implementation of the following.

- a) Structural and non-structural storm water controls to prevent or reduce the discharge of pollutants to surface waters of the state.
- b) Up-to-date list of significant materials stored on-site that could pollute storm water with a description of the handling and storage requirements and potential to discharge for each significant material.
- c) Good housekeeping practices including, but not limited to, maintaining a clean and orderly facility, properly storing and covering materials, and minimizing pollutant sources to prevent or reduce pollutant runoff.
- d) Routine maintenance and inspections of storm water management and control devices to ensure materials and equipment are clean and orderly and prevent or reduce pollutant runoff. The written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.



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- e) Comprehensive site inspections at least once every six (6) months. The comprehensive site inspection shall include an inspection of all structural storm water controls and a review of non-structural storm water controls to prevent or reduce pollutant runoff. A written report of the inspection and corrective actions shall be retained in accordance with Part II.B.5. of this permit.
- 3) Structural Storm Water Control Operation and Maintenance Activities
- a) The permittee shall implement the procedures for inspecting, cleaning, and maintaining permittee-owned or operated catch basins in the regulated area using the priority level assigned to each catch basin. The permittee shall document changes to the priority level for a catch basin as part of the progress report and as an update to the procedure.  
  
The permittee shall also implement the procedure for dewatering and disposal of materials extracted from the catch basins in accordance with Part 111 (Hazardous Waste), Part 115 (Solid Waste), and Part 121 (Liquid Industrial Waste) of the NREPA.
  - b) The permittee shall implement the procedure for inspecting and maintaining permittee-owned or operated structural storm water controls other than catch basins in the regulated area. The permittee shall document changes to the procedure as part of the progress report and as an update to the procedure.
  - c) The permittee shall implement the procedure requiring that new permittee-owned or operated facilities or structural storm water controls to address water quantity be designed and implemented in accordance with the post-construction storm water runoff performance standards and long-term operation and maintenance requirements in Part I.A.3.f. of this permit.
- 4) Municipal Operations and Maintenance Activities
- a) The permittee shall implement the procedure, including the BMPs identified, to prevent or reduce pollutant runoff from the permittee's operation and maintenance activities identified in the SWMP. The permittee shall document changes to the assessment of operation and maintenance activities for the potential to discharge pollutants to surface waters of the state as part of the progress report and as an update to the procedure.
  - b) The permittee shall implement the procedure for the street sweeping program for permittee-owned or operated streets, parking lots, or other impervious infrastructure in the regulated area using the sweeping methods and assigned priority levels identified in the procedure. The permittee shall document changes to the priority level for a street, parking lot, or other impervious infrastructure as part of the progress report and as an update to the procedure.  
  
The permittee shall also implement the procedure for dewatering and disposal of street sweeper waste material.
- 5) Managing Vegetated Properties  
The permittee shall implement the procedure requiring the permittee's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land.
- 6) Employee Training  
The permittee shall implement the employee training program to train employees involved in implementing pollution prevention and good housekeeping activities. At a minimum, existing staff shall be trained once during the permit cycle and new hire employees within the first year of their hire date.

**PART I****Section A. Limitations and Monitoring Requirements****7) Contractor Requirements and Oversight**

The permittee shall implement the procedure requiring contractors hired by the permittee to perform municipal operation and maintenance activities that comply with the permittee's pollution prevention and good housekeeping program and contractor oversight to ensure compliance.

**h. Total Maximum Daily Load (TMDL) Implementation Plan**

The permittee shall implement the TMDL Implementation Plan to reduce the discharge of pollutants from the permittee's MS4 to make progress in meeting Water Quality Standards. The permittee shall implement the TMDL Implementation Plan as part of the SWMP. The permittee has chosen to work collaboratively with watershed or regional partners to implement this plan or part of the plan, therefore each permittee is responsible for complying with the plan as described in the SWMP.

The following TMDL is applicable to the discharge from the permittee's MS4:

<u>Name of TMDL</u>	<u>Pollutant of Concern</u>
Detroit River	<i>E. coli</i>

The permittee shall implement the prioritized BMPs included in the TMDL Implementation Plan during the permit cycle to make progress in achieving the pollutant load reduction requirement in the TMDL. The permittee shall review, update, and revise the list of BMPs implemented as part of the TMDL Implementation Plan in accordance with the procedure included in the SWMP. The Department may determine that a permit modification is required, after opportunity for public comment, based on modifications to the TMDL Implementation Plan. The Department will notify the permittee if a modification is required.

The permittee shall implement the monitoring plan included in the TMDL Implementation Plan for assessing the effectiveness of the BMPs implemented in making progress toward achieving the TMDL pollutant load reduction. Available monitoring data shall be submitted with each progress report.

**4. SWMP Modifications****a. SWMP Modifications Requested by the Permittee**

Modifications to the previously approved SWMP may be requested by the permittee as follows:

1) Modifications adding BMPs (but not replacing, subtracting, or affecting the level of implementation of any other BMP) to the previously approved SWMP may be made by the permittee at any time upon written notification to the Department. Notification shall include a description of the modification, which may include a description of a new BMP with a corresponding measurable goal. Upon notification to the Department, the modification is considered an enforceable part of the approved SWMP.

2) Modifications replacing an ineffective or unfeasible BMP identified in the previously approved SWMP with an alternative BMP may be requested at any time by written notification to the Department. The ineffective or unfeasible BMP identified shall not be replaced in the previously approved SWMP unless the replacement is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:

- a) an analysis of why the BMP is ineffective or unfeasible (including cost-prohibitive);
- b) a measurable goal for the replacement BMP; and
- c) an analysis of why the replacement BMP is expected to achieve the intent of the BMP to be replaced.

**PART I****Section A. Limitations and Monitoring Requirements**

3) Modifications subtracting an ineffective or unfeasible BMP identified in the previously approved SWMP may be requested by written notification to the Department. The identified BMP shall not be subtracted from the previously approved SWMP unless the subtraction is approved by the Department. Modifications to the previously approved SWMP may result in a permit modification after opportunity for public comment. Such requests shall include the following:

- a) an analysis of why the BMP is ineffective or unfeasible (including cost prohibitive); and
- b) a determination of why the removal of the BMP will not change the permittee's ability to comply with the permit requirements.

b. Modifications Required by the Department

The Department may require the permittee to modify the SWMP as needed to:

- 1) address contributions from the permittee's MS4 discharge that impair receiving water quality;
- 2) include more stringent requirements necessary to comply with new state or federal statutory or regulatory requirements; and/or
- 3) include such other conditions deemed necessary by the Department to comply with the goals and requirements of the Federal Act or the NREPA, including the requirement to reduce the discharge of pollutants from the MS4 to the maximum extent practicable.

**5. Request for Approval to Use Water Treatment Additives**

This permit does not authorize the use of any water treatment additive without prior written approval from the Department. Such approval is authorized under separate correspondence. Water treatment additives include any materials that are added to water used at the facility, or to wastewater generated by the facility, to condition or treat the water. Permittees proposing to use water treatment additives, including a proposed increased concentration of a previously approved water treatment additive, shall submit a request for approval via the Department's MiWaters system. The MiWaters website is located at <https://miwaters.deq.state.mi.us>. Instructions for submitting such a request may be obtained at <http://www.michigan.gov/eglenpdcs> (near the bottom of that page, click on one or both of the links located under the Water Treatment Additives banner). Additional monitoring and reporting may be required as a condition of approval to use the water treatment additive.

A request for approval to use water treatment additives shall include all of the following usage and discharge information for each water treatment additive proposed to be used:

- a. The Safety Data Sheet (SDS);
- b. Ingredient information, including the name of each ingredient, CAS number for each ingredient, and fractional content by weight for each ingredient;
- c. The proposed water treatment additive discharge concentration with supporting calculations;
- d. The discharge frequency (i.e., number of hours per day and number of days per year);
- e. The outfall(s) and monitoring point(s) from which the water treatment additive is to be discharged;
- f. The type of removal treatment, if any, that the water treatment additive receives prior to discharge;
- g. The water treatment additive's function (i.e., microbiocide, flocculant, etc.);

## PART I

### Section A. Limitations and Monitoring Requirements

- h. The SDS shall include a 48-hour LC50 or EC50 for a North American freshwater planktonic crustacean (either *Ceriodaphnia* sp., *Daphnia* sp., or *Simocephalus* sp.); The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated; and
- i. The SDS shall include the results of a toxicity test for one (1) other North American freshwater aquatic species (other than a planktonic crustacean) that meets a minimum requirement of R 323.1057(2) of the Water Quality Standards. The results shall be based on the whole water treatment additive, shall not be results based on a similar product, and shall not be estimated. Examples of tests that would meet this requirement include a 96-hour LC50 for rainbow trout, bluegill, or fathead minnow.

### 6. Tracer Dye Discharges

This permit does not authorize the discharge of tracer dyes without approval from the Department. Requests to discharge tracer dyes shall be submitted to the Department in accordance with Rule 1097 (R 323.1097 of the Michigan Administrative Code).

### 7. Storm Water Program Manager (Facility Contact)

The "Facility Contact" was specified in the application. The permittee may replace the facility contact at any time, and shall notify the Department in writing within 10 days after replacement (including the name, address and telephone number of the new facility contact).

- a. The facility contact shall be (or a duly authorized representative of this person):
  - for a corporation, a principal executive officer of at least the level of vice president; or a designated representative if the representative is responsible for the overall operation of the facility from which the discharge originates, as described in the permit application or other NPDES form,
  - for a partnership, a general partner,
  - for a sole proprietorship, the proprietor, or
  - for a municipal, state, or other public facility, either a principal executive officer, the mayor, village president, city or village manager or other duly authorized employee.
- b. A person is a duly authorized representative only if:
  - the authorization is made in writing to the Department by a person described in paragraph a. of this section; and
  - the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the facility (a duly authorized representative may thus be either a named individual or any individual occupying a named position).

Nothing in this section obviates the permittee from properly submitting reports and forms as required by law.

## PART I

### Section B. Program Assessment and Reporting

#### 1. Progress Reports

Progress reports shall be submitted on or before November 1, 2021, April 1, 2023, and on or before April 1 every two (2) years following. The Department may approve alternate dates for progress report submittal if requested and adequately justified by the permittee. Each progress report shall contain the following information for the entire period that has elapsed since the last progress report submittal (i.e., the reporting cycle):

a. Compliance Assessment

The permittee shall describe the status of compliance with the approved SWMP identified in Part I.A.3 of this permit. The permittee shall assess and describe the appropriateness of the BMPs identified in the SWMP. The report shall describe the progress made towards achieving the identified measurable goals for each of the BMPs, and specific evaluation criteria as follows:

1) For the PEP, provide a summary of the evaluation of the overall effectiveness of the PEP, using the evaluation methods described in the PEP.

2) For the IDEP, provide a summary of the evaluation and determination of the overall effectiveness of the IDEP, using the evaluation methods described in the IDEP. For each illicit discharge that was not eliminated within 90 days of its discovery the permittee shall provide a written certification that the illicit discharge was eliminated or a description of how the illicit discharge will be eliminated.

3) If applicable, the permittee shall submit to the Department any new outfall or point of discharge information as required in Part I.A.2. of this permit.

4) For the TMDL Implementation Plan, if monitoring data is available in accordance with the monitoring plan, provide an assessment of progress made toward achieving the TMDL pollutant load reduction requirement.

b. Data and Results

The permittee shall provide a summary of all of the information collected and analyzed, including monitoring data, if any, during the reporting cycle.

c. Upcoming Activities

The permittee shall provide a summary of the BMPs to be implemented during the next reporting cycle.

d. Changes to BMPs and Measurable Goals

The permittee shall describe any changes to BMPs or measurable goals in the approved SWMP. In accordance with the permit, these changes will be reviewed to determine if a permit modification is necessary. The Department will notify the permittee if a permit modification is required.

e. Notice of Changes in Nested Jurisdiction Agreements

The permittee shall identify any nested jurisdictions that enter into or terminate permit agreements with the permittee which were not identified in the SWMP. The permittee may request to modify the permit coverage to add or remove a nested MS4 by submitting a request to the Department for approval in accordance with Part I.A.1.b. of this permit. Modifications to the permit coverage may result in a permit modification, after opportunity for public comment.

f. Required Signatures

All reports required by this permit, and other information requested by the Department, shall be signed by either a principal executive officer or ranking elected official, or by a duly authorized representative of that person in accordance with 40 CFR 122.22(b).

## PART II

Part II may include terms and /or conditions not applicable to discharges covered under this permit.

### Section A. Definitions

**Acute toxic unit (TU<sub>A</sub>)** means  $100/LC_{50}$  where the  $LC_{50}$  is determined from a whole effluent toxicity (WET) test which produces a result that is statistically or graphically estimated to be lethal to 50% of the test organisms.

**Annual monitoring frequency** refers to a calendar year beginning on January 1 and ending on December 31. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Authorized public agency** means a state, local, or county agency that is designated pursuant to the provisions of Section 9110 of Part 91, Soil and Sedimentation Control, of the NREPA, to implement soil erosion and sedimentation control requirements with regard to construction activities undertaken by that agency.

**Best management practices (BMPs)** means structural devices or nonstructural practices that are designed to prevent pollutants from entering into storm water, to direct the flow of storm water, or to treat polluted storm water.

**Bioaccumulative chemical of concern (BCC)** means a chemical which, upon entering the surface waters, by itself or as its toxic transformation product, accumulates in aquatic organisms by a human health bioaccumulation factor of more than 1000 after considering metabolism and other physiochemical properties that might enhance or inhibit bioaccumulation. The human health bioaccumulation factor shall be derived according to R 323.1057(5). Chemicals with half-lives of less than 8 weeks in the water column, sediment, and biota are not BCCs. The minimum bioaccumulation concentration factor (BAF) information needed to define an organic chemical as a BCC is either a field-measured BAF or a BAF derived using the biota-sediment accumulation factor (BSAF) methodology. The minimum BAF information needed to define an inorganic chemical as a BCC, including an organometal, is either a field-measured BAF or a laboratory-measured bioconcentration factor (BCF). The BCCs to which these rules apply are identified in Table 5 of R 323.1057 of the Water Quality Standards.

**Biosolids** are the solid, semisolid, or liquid residues generated during the treatment of sanitary sewage or domestic sewage in a treatment works. This includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes and a derivative of the removed scum or solids.

**Bulk biosolids** means biosolids that are not sold or given away in a bag or other container for application to a lawn or home garden.

**CAFO** means concentrated animal feeding operation.

**Certificate of Coverage (COC)** is a document, issued by the Department, which authorizes a discharge under a general permit.

**Chronic toxic unit (TU<sub>C</sub>)** means  $100/MATC$  or  $100/IC_{25}$ , where the maximum acceptable toxicant concentration (MATC) and  $IC_{25}$  are expressed as a percent effluent in the test medium.

**Class B biosolids** refers to material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PSRP) in accordance with the Part 24 Rules, Land Application of Biosolids, promulgated under Part 31 of the NREPA. Processes include aerobic digestion, composting, anaerobic digestion, lime stabilization and air drying.

**Combined sewer system** is a sewer system in which storm water runoff is combined with sanitary wastes.

**Composite sample** is a sample collected over time, either by continuous sampling or by mixing discrete samples. A composite sample represents the average wastewater characteristics during the compositing period. Various methods for compositing are available and are based on either time or flow-proportioning, the choice of which will depend on the permit requirements.

## PART II

### Section A. Definitions

**Continuous monitoring** refers to sampling/readings that occur at regular and consistent intervals throughout a 24-hour period and at a frequency sufficient to capture data that are representative of the discharge. The maximum acceptable interval between samples/readings shall be one (1) hour.

**Daily concentration**

FOR PARAMETERS OTHER THAN pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – Daily concentration is the sum of the concentrations of the individual samples of a parameter taken within a calendar day divided by the number of samples taken within that calendar day. The daily concentration will be used to determine compliance with any maximum and minimum daily concentration limitations. For guidance and examples showing how to perform calculations using results below quantification levels, see the document entitled “Reporting Results Below Quantification,” available at [https://www.michigan.gov/documents/deq/wrd-npdes-results-quantification\\_620791\\_7.pdf](https://www.michigan.gov/documents/deq/wrd-npdes-results-quantification_620791_7.pdf).

FOR pH, DISSOLVED OXYGEN, TEMPERATURE, AND CONDUCTIVITY – The daily concentration used to determine compliance with maximum daily pH, temperature, and conductivity limitations is the highest pH, temperature, and conductivity readings obtained within a calendar day. The daily concentration used to determine compliance with minimum daily pH and dissolved oxygen limitations is the lowest pH and dissolved oxygen readings obtained within a calendar day.

**Daily loading** is the total discharge by weight of a parameter discharged during any calendar day. This value is calculated by multiplying the daily concentration by the total daily flow and by the appropriate conversion factor. The daily loading will be used to determine compliance with any maximum daily loading limitations. When required by the permit, report the maximum calculated daily loading for the month in the “MAXIMUM” column under “QUANTITY OR LOADING” on the DMRs.

**Daily monitoring frequency** refers to a 24-hour day. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Department** means the Michigan Department of Environment, Great Lakes, and Energy.

**Detection level** means the lowest concentration or amount of the target analyte that can be determined to be different from zero by a single measurement at a stated level of probability.

**Discharge** means the addition of any waste, waste effluent, wastewater, pollutant, or any combination thereof to any surface water of the state.

**EC<sub>50</sub>** means a statistically or graphically estimated concentration that is expected to cause 1 or more specified effects in 50% of a group of organisms under specified conditions.

**Fecal coliform bacteria monthly**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a discharge event. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the “AVERAGE” column under “QUALITY OR CONCENTRATION” on the DMR. If the period in which the discharge event occurred was partially in each of two months, the calculated monthly value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria monthly is the geometric mean of all daily concentrations determined during a reporting month. Days on which no daily concentration is determined shall not be used to determine the calculated monthly value. The calculated monthly value will be used to determine compliance with the maximum monthly fecal coliform bacteria limitations. When required by the permit, report the calculated monthly value in the “AVERAGE” column under “QUALITY OR CONCENTRATION” on the DMR.

## PART II

### Section A. Definitions

#### **Fecal coliform bacteria 7-day**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days of discharge during a discharge event. If the number of daily concentrations determined during the discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean value for the month in the “MAXIMUM” column under “QUALITY OR CONCENTRATION” on the DMRs. If the 7-day period was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – Fecal coliform bacteria 7-day is the geometric mean of the daily concentrations determined during any 7 consecutive days in a reporting month. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. Days on which no daily concentration is determined shall not be used to determine the value. The calculated 7-day value will be used to determine compliance with the maximum 7-day fecal coliform bacteria limitations. When required by the permit, report the maximum calculated 7-day geometric mean for the month in the “MAXIMUM” column under “QUALITY OR CONCENTRATION” on the DMRs. The first calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

**Flow-proportioned composite sample** is a composite sample in which either a) the volume of each portion of the composite is proportional to the effluent flow rate at the time that portion is obtained, or b) a constant sample volume is obtained at varying time intervals proportional to the effluent flow rate.

**General permit** means an NPDES permit authorizing a category of similar discharges.

**Geometric mean** is the average of the logarithmic values of a base 10 data set, converted back to a base 10 number.

**Grab sample** is a single sample taken at neither a set time nor flow.

**IC<sub>25</sub>** means the toxicant concentration that would cause a 25% reduction in a nonquantal biological measurement for the test population.

**Illicit connection** means a physical connection to a municipal separate storm sewer system that primarily conveys non-storm water discharges other than uncontaminated groundwater into the storm sewer; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

**Illicit discharge** means any discharge to, or seepage into, a municipal separate storm sewer system that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or litter; collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

**Individual permit** means a site-specific NPDES permit.

**Inlet** means a catch basin, roof drain, conduit, drain tile, retention pond riser pipe, sump pump, or other point where storm water or wastewater enters into a closed conveyance system prior to discharge off site or into waters of the state.



## PART II

### Section A. Definitions

**Interference** is a discharge which, alone or in conjunction with a discharge or discharges from other sources, both: 1) inhibits or disrupts a POTW, its treatment processes or operations, or its sludge processes, use or disposal; and 2) therefore, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or, of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent state or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including state regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act. [This definition does not apply to sample matrix interference].

**Land application** means spraying or spreading biosolids or a biosolids derivative onto the land surface, injecting below the land surface, or incorporating into the soil so that the biosolids or biosolids derivative can either condition the soil or fertilize crops or vegetation grown in the soil.

**LC<sub>50</sub>** means a statistically or graphically estimated concentration that is expected to be lethal to 50% of a group of organisms under specified conditions.

**Maximum acceptable toxicant concentration (MATC)** means the concentration obtained by calculating the geometric mean of the lower and upper chronic limits from a chronic test. A lower chronic limit is the highest tested concentration that did not cause the occurrence of a specific adverse effect. An upper chronic limit is the lowest tested concentration which did cause the occurrence of a specific adverse effect and above which all tested concentrations caused such an occurrence.

**Maximum extent practicable** means implementation of best management practices by a public body to comply with an approved storm water management program as required by a national permit for a municipal separate storm sewer system, in a manner that is environmentally beneficial, technically feasible, and within the public body's legal authority.

**MBTU/hr** means million British Thermal Units per hour.

**MGD** means million gallons per day.

**Monthly concentration** is the sum of the daily concentrations determined during a reporting period divided by the number of daily concentrations determined. The calculated monthly concentration will be used to determine compliance with any maximum monthly concentration limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly concentration in the "AVERAGE" column under "QUALITY OR CONCENTRATION" on the DMR.

For minimum percent removal requirements, the monthly influent concentration and the monthly effluent concentration shall be determined. The calculated monthly percent removal, which is equal to 100 times the quantity [1 minus the quantity (monthly effluent concentration divided by the monthly influent concentration)], shall be reported in the "MINIMUM" column under "QUALITY OR CONCENTRATION" on the DMRs.

**Monthly loading** is the sum of the daily loadings of a parameter divided by the number of daily loadings determined during a reporting period. The calculated monthly loading will be used to determine compliance with any maximum monthly loading limitations. Days with no discharge shall not be used to determine the value. When required by the permit, report the calculated monthly loading in the "AVERAGE" column under "QUANTITY OR LOADING" on the DMR.

**Monthly monitoring frequency** refers to a calendar month. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Municipal separate storm sewer** means a conveyance or system of conveyances designed or used for collecting or conveying storm water which is not a combined sewer and which is not part of a POTW as defined in the Code of Federal Regulations at 40 CFR 122.2.

## PART II

### Section A. Definitions

**Municipal separate storm sewer system (MS4)** means all separate storm sewers that are owned or operated by the United States, a state, city, village, township, county, district, association, or other public body created by or pursuant to state law, having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law, such as a sewer district, flood control district, or drainage district, or similar entity, or a designated or approved management agency under Section 208 of the Clean Water Act that discharges to the waters of the state. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

**National Pretreatment Standards** are the regulations promulgated by or to be promulgated by the Federal Environmental Protection Agency pursuant to Section 307(b) and (c) of the Clean Water Act. The standards establish nationwide limits for specific industrial categories for discharge to a POTW.

**No observed adverse effect level (NOAEL)** means the highest tested dose or concentration of a substance which results in no observed adverse effect in exposed test organisms where higher doses or concentrations result in an adverse effect.

**Noncontact cooling water** is water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product or finished product.

**Nondomestic user** is any discharger to a POTW that discharges wastes other than or in addition to water-carried wastes from toilet, kitchen, laundry, bathing or other facilities used for household purposes.

**Nonstructural controls** are practices or procedures implemented by employees at a facility to manage storm water or to prevent contamination of storm water.

**NPDES** means National Pollutant Discharge Elimination System.

**Outfall** is the location at which a point source discharge first enters a surface water of the state.

**Part 91 agency** means an agency that is designated by a county board of commissioners pursuant to the provisions of Section 9105 of Part 91 of the NREPA; an agency that is designated by a city, village, or township in accordance with the provisions of Section 9106 of Part 91 of the NREPA; or the Department for soil erosion and sedimentation control activities under Part 615, Supervisor of Wells; Part 631, Reclamation of Mining Lands; or Part 632, Nonferrous Metallic Mineral Mining, of the NREPA, pursuant to the provisions of Section 9115 of Part 91 of the NREPA.

**Part 91 permit** means a soil erosion and sedimentation control permit issued by a Part 91 agency pursuant to the provisions of Part 91 of the NREPA.

**Partially treated sewage** is any sewage, sewage and storm water, or sewage and wastewater, from domestic or industrial sources that is treated to a level less than that required by the permittee's NPDES permit, or that is not treated to national secondary treatment standards for wastewater, including discharges to surface waters from retention treatment facilities.

**Point of discharge** is the location of a point source discharge where storm water is discharged directly into a separate storm sewer system.

**Point source discharge** means a discharge from any discernible, confined, discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, or rolling stock. Changing the surface of land or establishing grading patterns on land will result in a point source discharge where the runoff from the site is ultimately discharged to waters of the state.

## PART II

### Section A. Definitions

**Polluting material** means any material, in solid or liquid form, identified as a polluting material under the Part 5 Rules, Spillage of Oil and Polluting Materials, promulgated under Part 31 of the NREPA (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

**POTW** is a publicly owned treatment work.

**Predevelopment** is the last land use prior to the planned new development or redevelopment.

**Pretreatment** is reducing the amount of pollutants, eliminating pollutants, or altering the nature of pollutant properties to a less harmful state prior to discharge into a public sewer. The reduction or alteration can be by physical, chemical, or biological processes, process changes, or by other means. Dilution is not considered pretreatment unless expressly authorized by an applicable National Pretreatment Standard for a particular industrial category.

**Public** (as used in the MS4 individual permit) means all persons who potentially could affect the authorized storm water discharges, including, but not limited to, residents, visitors to the area, public employees, businesses, industries, and construction contractors and developers.

**Public body** means the United States; the state of Michigan; a city, village, township, county, school district, public college or university, or single-purpose governmental agency; or any other body which is created by federal or state statute or law.

**Qualified Personnel** means an individual who meets qualifications acceptable to the Department and who is authorized by an Industrial Storm Water Certified Operator to collect the storm water sample.

**Qualifying storm event** means a storm event causing greater than 0.1 inch of rainfall and occurring at least 72 hours after the previous measurable storm event that also caused greater than 0.1 inch of rainfall. Upon request, the Department may approve an alternate definition meeting the condition of a qualifying storm event.

**Quantification level** means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.

**Quarterly monitoring frequency** refers to a three month period, defined as January through March, April through June, July through September, and October through December. When required by this permit, an analytical result, reading, value or observation shall be reported for that period if a discharge occurs during that period.

**Regional Administrator** is the Region 5 Administrator, U.S. EPA, located at R-19J, 77 W. Jackson Blvd., Chicago, Illinois 60604.

**Regulated area** means the permittee's urbanized area, where urbanized area is defined as a place and its adjacent densely-populated territory that together have a minimum population of 50,000 people as defined by the United States Bureau of the Census and as determined by the latest available decennial census.

**Secondary containment structure** means a unit, other than the primary container, in which significant materials are packaged or held, which is required by state or federal law to prevent the escape of significant materials by gravity into sewers, drains, or otherwise directly or indirectly into any sewer system or to the surface waters or groundwaters of the state.

**Separate storm sewer system** means a system of drainage, including, but not limited to, roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels, which is not a combined sewer where storm water mixes with sanitary wastes, and is not part of a POTW.

## PART II

### Section A. Definitions

**Significant industrial user** is a nondomestic user that: 1) is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N; or 2) discharges an average of 25,000 gallons per day or more of process wastewater to a POTW (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the permittee as defined in 40 CFR 403.12(a) on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's treatment plant operation or violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

**Significant materials** means any material which could degrade or impair water quality, including but not limited to: raw materials; fuels; solvents, detergents, and plastic pellets; finished materials such as metallic products; hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (see 40 CFR 372.65); any chemical the facility is required to report pursuant to Section 313 of Emergency Planning and Community Right-to-Know Act (EPCRA); polluting materials as identified under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code); Hazardous Wastes as defined in Part 111, Hazardous Waste Management, of the NREPA; fertilizers; pesticides; and waste products such as ashes, slag, and sludge that have the potential to be released with storm water discharges.

**Significant spills and significant leaks** means any release of a polluting material reportable under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

**Special-use area** means storm water discharges for which the Department has determined that additional monitoring is needed from: secondary containment structures required by state or federal law; lands on Michigan's List of Sites of Environmental Contamination pursuant to Part 201, Environmental Remediation, of the NREPA; and/or areas with other activities that may contribute pollutants to the storm water.

**Stoichiometric** means the quantity of a reagent calculated to be necessary and sufficient for a given chemical reaction.

**Storm water** means storm water runoff, snow melt runoff, surface runoff and drainage, and non-storm water included under the conditions of this permit.

**Storm water discharge point** is the location where the point source discharge of storm water is directed to surface waters of the state or to a separate storm sewer. It includes the location of all point source discharges where storm water exits the facility, including *outfalls* which discharge directly to surface waters of the state, and *points of discharge* which discharge directly into separate storm sewer systems.

**Structural controls** are physical features or structures used at a facility to manage or treat storm water.

**SWPPP** means the Storm Water Pollution Prevention Plan prepared in accordance with this permit.

**Tier I value** means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier I toxicity database.

**Tier II value** means a value for aquatic life, human health or wildlife calculated under R 323.1057 of the Water Quality Standards using a tier II toxicity database.

**Total maximum daily loads (TMDLs)** are required by the Clean Water Act for waterbodies that do not meet water quality standards. TMDLs represent the maximum daily load of a pollutant that a waterbody can assimilate and meet water quality standards, and an allocation of that load among point sources, nonpoint sources, and a margin of safety.

## PART II

### Section A. Definitions

**Toxicity reduction evaluation (TRE)** means a site-specific study conducted in a stepwise process designed to identify the causative agents of effluent toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in effluent toxicity.

**Water Quality Standards** means the Part 4 Water Quality Standards promulgated pursuant to Part 31 of the NREPA, being R 323.1041 through R 323.1117 of the Michigan Administrative Code.

**Weekly monitoring frequency** refers to a calendar week which begins on Sunday and ends on Saturday. When required by this permit, an analytical result, reading, value, or observation shall be reported for that period if a discharge occurs during that period. If the calendar week begins in one month and ends in the following month, the analytical result, reading, value, or observation shall be reported in the month in which monitoring was conducted.

**WWSL** is a wastewater stabilization lagoon.

**WWSL discharge event** is a discrete occurrence during which effluent is discharged to the surface water up to 10 days of a consecutive 14-day period.

**3-portion composite sample** is a sample consisting of three equal-volume grab samples collected at equal intervals over an 8-hour period.

#### **7-day concentration**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily concentrations determined. If the number of daily concentrations determined during the WWSL discharge event is less than 7 days, the number of actual daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations. When required by the permit, report the maximum calculated 7-day concentration for the WWSL discharge event in the “MAXIMUM” column under “QUALITY OR CONCENTRATION” on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day concentration is the sum of the daily concentrations determined during any 7 consecutive days in a reporting month divided by the number of daily concentrations determined. If the number of daily concentrations determined is less than 7, the actual number of daily concentrations determined shall be used for the calculation. The calculated 7-day concentration will be used to determine compliance with any maximum 7-day concentration limitations in the reporting month. When required by the permit, report the maximum calculated 7-day concentration for the month in the “MAXIMUM” column under “QUALITY OR CONCENTRATION” on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

## PART II

### Section A. Definitions

#### **7-day loading**

FOR WWSLs THAT COLLECT AND STORE WASTEWATER AND ARE AUTHORIZED TO DISCHARGE ONLY IN THE SPRING AND/OR FALL ON AN INTERMITTENT BASIS – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days of discharge during a WWSL discharge event divided by the number of daily loadings determined. If the number of daily loadings determined during the WWSL discharge event is less than 7 days, the number of actual daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations. When required by the permit, report the maximum calculated 7-day loading for the WWSL discharge event in the “MAXIMUM” column under “QUANTITY OR LOADING” on the DMR. If the WWSL discharge event was partially in each of two months, the value shall be reported on the DMR of the month in which the last day of discharge occurred.

FOR ALL OTHER DISCHARGES – The 7-day loading is the sum of the daily loadings determined during any 7 consecutive days in a reporting month divided by the number of daily loadings determined. If the number of daily loadings determined is less than 7, the actual number of daily loadings determined shall be used for the calculation. The calculated 7-day loading will be used to determine compliance with any maximum 7-day loading limitations in the reporting month. When required by the permit, report the maximum calculated 7-day loading for the month in the “MAXIMUM” column under “QUANTITY OR LOADING” on the DMR. The first 7-day calculation shall be made on day 7 of the reporting month, and the last calculation shall be made on the last day of the reporting month.

**24-hour composite sample** is a flow-proportioned composite sample consisting of hourly or more frequent portions that are taken over a 24-hour period and in which the volume of each portion is proportional to the discharge flow rate at the time that portion is taken. A time-proportioned composite sample may be used upon approval from the Department if the permittee demonstrates it is representative of the discharge.

## PART II

### Section B. Monitoring Procedures

#### 1. Representative Samples

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

#### 2. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations promulgated pursuant to Section 304(h) of the Clean Water Act (40 CFR Part 136 – Guidelines Establishing Test Procedures for the Analysis of Pollutants), unless specified otherwise in this permit. **Test procedures used shall be sufficiently sensitive to determine compliance with applicable effluent limitations.** For lists of approved test methods, go to <https://www.epa.gov/cwa-methods>. Requests to use test procedures not promulgated under 40 CFR Part 136 for pollutant monitoring required by this permit shall be made in accordance with the Alternate Test Procedures regulations specified in 40 CFR 136.4. These requests shall be submitted to the Manager of the Permits Section, Water Resources Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30458, Lansing, Michigan, 48909-7958. The permittee may use such procedures upon approval.

The permittee shall periodically calibrate and perform maintenance procedures on all analytical instrumentation at intervals to ensure accuracy of measurements. The calibration and maintenance shall be performed as part of the permittee's laboratory Quality Assurance/Quality Control program.

#### 3. Instrumentation

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring instrumentation at intervals to ensure accuracy of measurements.

#### 4. Recording Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information: 1) the exact place, date, and time of measurement or sampling; 2) the person(s) who performed the measurement or sample collection; 3) the dates the analyses were performed; 4) the person(s) who performed the analyses; 5) the analytical techniques or methods used; 6) the date of and person responsible for equipment calibration; and 7) the results of all required analyses.

#### 5. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Department.

## PART II

### Section C. Reporting Requirements

#### 1. Start-Up Notification

The permittee shall notify the Department of start-up if one of the following conditions applies and in accordance with the applicable condition:

a. Non-CAFOs

1) **If this is an individual permit** and the permittee will not discharge during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to commencement of the discharge.

2) **If this is a general permit** and the permittee will not discharge during the first 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to commencement of the discharge.

b. CAFOs

1) **If this is an individual permit** and the permittee will not populate with animals during the first 60 days following the effective date of this permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of this permit, and then again 60 days prior to populating with animals.

2) **If this is a general permit** and the permittee will not populate with animals during 60 days following the effective date of the Certificate of Coverage (COC) issued under this general permit, the permittee shall notify the Department via MiWaters within 14 days following the effective date of the COC, and then again 60 days prior to populating with animals.

#### 2. Submittal Requirements for Self-Monitoring Data

Part 31 of the NREPA (specifically Section 324.3110(7)); and R 323.2155(2) of Part 21, Wastewater Discharge Permits, promulgated under Part 31 of the NREPA, allow the Department to specify the forms to be utilized for reporting the required self-monitoring data. Unless instructed on the effluent limitations page to conduct "Retained Self-Monitoring," the permittee shall submit self-monitoring data via the Department's MiWaters system.

The permittee shall utilize the information provided on the MiWaters website, located at <https://miwaters.deq.state.mi.us>, to access and submit the electronic forms. Both monthly summary and daily data shall be submitted to the Department no later than the 20<sup>th</sup> day of the month following each month of the authorized discharge period(s). The permittee may be allowed to submit the electronic forms after this date if the Department has granted an extension to the submittal date.



## PART II

### Section C. Reporting Requirements

#### 3. Retained Self-Monitoring Requirements

If instructed on the effluent limits page (or otherwise authorized by the Department in accordance with the provisions of this permit) to conduct retained self-monitoring, the permittee shall maintain a year-to-date log of retained self-monitoring results and, upon request, provide such log for inspection to the staff of the Department. Retained self-monitoring results are public information and shall be promptly provided to the public upon request.

The permittee shall certify, in writing, to the Department, on or before January 10th (April 1st for animal feeding operation facilities) of each year, that: 1) all retained self-monitoring requirements have been complied with and a year-to-date log has been maintained; and 2) the application on which this permit is based still accurately describes the discharge. With this annual certification, the permittee shall submit a summary of the previous year's monitoring data. The summary shall include maximum values for samples to be reported as daily maximums and/or monthly maximums and minimum values for any daily minimum samples.

Retained self-monitoring may be denied to a permittee by notification in writing from the Department. In such cases, the permittee shall submit self-monitoring data in accordance with Part II.C.2., above. Such a denial may be rescinded by the Department upon written notification to the permittee. Reissuance or modification of this permit or reissuance or modification of an individual permittee's authorization to discharge shall not affect previous approval or denial for retained self-monitoring unless the Department provides notification in writing to the permittee.

#### 4. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report. Such increased frequency shall also be indicated.

Monitoring required pursuant to Part 41 of the NREPA or Rule 35 of the Mobile Home Park Commission Act, 1987 PA 96, as amended, for assurance of proper facility operation, shall be submitted as required by the Department.

#### 5. Compliance Dates Notification

Within 14 days of every compliance date specified in this permit, the permittee shall submit a written notification to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) indicating whether or not the particular requirement was accomplished. If the requirement was not accomplished, the notification shall include an explanation of the failure to accomplish the requirement, actions taken or planned by the permittee to correct the situation, and an estimate of when the requirement will be accomplished. If a written report is required to be submitted by a specified date and the permittee accomplishes this, a separate written notification is not required.

## PART II

### Section C. Reporting Requirements

#### 6. Noncompliance Notification

Compliance with all applicable requirements set forth in the Clean Water Act, Parts 31 and 41 of the NREPA, and related regulations and rules is required. All instances of noncompliance shall be reported as follows:

- a. **24-Hour Reporting**  
Any noncompliance which may endanger health or the environment (including maximum and/or minimum daily concentration discharge limitation exceedances) shall be reported, verbally, within 24 hours from the time the permittee becomes aware of the noncompliance by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC). A written submission shall also be provided via MiWaters (<https://miwaters.deq.state.mi.us>) within five (5) days.
- b. **Other Reporting**  
The permittee shall report, in writing via MiWaters (<https://miwaters.deq.state.mi.us>), all other instances of noncompliance not described in a. above at the time monitoring reports are submitted; or, in the case of retained self-monitoring, within five (5) days from the time the permittee becomes aware of the noncompliance.

Reporting shall include: 1) a description of the discharge and cause of noncompliance; 2) the period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue; and 3) the steps taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

#### 7. Spill Notification

The permittee shall immediately report any release of any polluting material which occurs to the surface waters or groundwaters of the state, unless the permittee has determined that the release is not in excess of the threshold reporting quantities specified in the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code), by calling the Department at the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if the notice is provided after regular working hours, by calling the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

Within 10 days of the release, the permittee shall submit to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) a full written explanation as to the cause of the release, the discovery of the release, response measures (clean-up and/or recovery) taken, and preventive measures taken or a schedule for completion of measures to be taken to prevent reoccurrence of similar releases.

## PART II

### Section C. Reporting Requirements

#### 8. Upset Noncompliance Notification

If a process "upset" (defined as an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee) has occurred, the permittee who wishes to establish the affirmative defense of upset shall notify the Department by telephone within 24 hours of becoming aware of such conditions; and within five (5) days, provide in writing, the following information:

- a. that an upset occurred and that the permittee can identify the specific cause(s) of the upset;
- b. that the permitted wastewater treatment facility was, at the time, being properly operated and maintained (note that an upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation); and
- c. that the permittee has specified and taken action on all responsible steps to minimize or correct any adverse impact in the environment resulting from noncompliance with this permit.

No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

In any enforcement proceedings, the permittee, seeking to establish the occurrence of an upset, has the burden of proof.

#### 9. Bypass Prohibition and Notification

- a. Bypass Prohibition  
Bypass is prohibited, and the Department may take an enforcement action, unless:
  - 1) bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
  - 2) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass; and
  - 3) the permittee submitted notices as required under b. or c. below.
- b. Notice of Anticipated Bypass  
If the permittee knows in advance of the need for a bypass, the permittee shall submit written notification to the Department before the anticipated date of the bypass. This notification shall be submitted at least 10 days before the date of the bypass; however, the Department will accept fewer than 10 days advance notice if adequate explanation for this is provided. The notification shall provide information about the anticipated bypass as required by the Department. The Department may approve an anticipated bypass, after considering its adverse effects, if it will meet the three (3) conditions specified in a. above.
- c. Notice of Unanticipated Bypass  
As soon as possible but no later than 24 hours from the time the permittee becomes aware of the unanticipated bypass, the permittee shall notify the Department by calling the number indicated on the second page of this permit (or, if this is a general permit, on the COC); or, if notification is provided after regular working hours, call the Department's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706.

## PART II

### Section C. Reporting Requirements

d. Written Report of Bypass

A written submission shall be provided within five (5) working days of commencing any bypass to the Department, and at additional times as directed by the Department. The written submission shall contain a description of the bypass and its cause; the period of bypass, including exact dates and times, and if the bypass has not been corrected, the anticipated time it is expected to continue; steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass; and other information as required by the Department.

e. Bypass Not Exceeding Limitations

The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to ensure efficient operation. These bypasses are not subject to the provisions of a., b., c., and d., above. This provision does not relieve the permittee of any notification responsibilities under Part II.C.11. of this permit.

f. Definitions

1) Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

### 10. Bioaccumulative Chemicals of Concern (BCC)

Consistent with the requirements of R 323.1098 and R 323.1215 of the Michigan Administrative Code, the permittee is prohibited from undertaking any action that would result in a lowering of water quality from an increased loading of a BCC unless an increased use request and antidegradation demonstration have been submitted and approved by the Department.

## PART II

### Section C. Reporting Requirements

#### 11. Notification of Changes in Discharge

The permittee shall notify the Department, via MiWaters (<https://miwaters.deq.state.mi.us>), as soon as possible but within no more than 10 days of knowing, or having reason to believe, that any activity or change has occurred or will occur which would result in the discharge of: 1) detectable levels of chemicals on the current Michigan Critical Materials Register, priority pollutants or hazardous substances set forth in 40 CFR 122.21, Appendix D, or the Pollutants of Initial Focus in the Great Lakes Water Quality Initiative specified in 40 CFR 132.6, Table 6, which were not acknowledged in the application or listed in the application at less than detectable levels; 2) detectable levels of any other chemical not listed in the application or listed at less than detection, for which the application specifically requested information; or 3) any chemical at levels greater than five times the average level reported in the complete application (see the first page of this permit, for the date(s) the complete application was submitted). Any other monitoring results obtained as a requirement of this permit shall be reported in accordance with the compliance schedules.

#### 12. Changes in Facility Operations

Any anticipated action or activity, including but not limited to facility expansion, production increases, or process modification, which will result in new or increased loadings of pollutants to the receiving waters must be reported to the Department by a) submission of an increased use request (application) and all information required under R 323.1098 (Antidegradation) of the Water Quality Standards or b) by written notice if the following conditions are met: 1) the action or activity will not result in a change in the types of wastewater discharged or result in a greater quantity of wastewater than currently authorized by this permit; 2) the action or activity will not result in violations of the effluent limitations specified in this permit; 3) the action or activity is not prohibited by the requirements of Part II.C.10.; and 4) the action or activity will not require notification pursuant to Part II.C.11. Following such written notice, the permit or, if applicable, the facility's COC, may be modified according to applicable laws and rules to specify and limit any pollutant not previously limited.

#### 13. Transfer of Ownership or Control

In the event of any change in ownership or control of facilities from which the authorized discharge emanates, the following requirements apply: Not less than 30 days prior to the actual transfer of ownership or control – for non-CAFOs, or within 30 days of the actual transfer of ownership or control – for CAFOs, the permittee shall submit to the Department via MiWaters (<https://miwaters.deq.state.mi.us>) a written agreement between the current permittee and the new permittee containing: 1) the legal name and address of the new owner; 2) a specific date for the effective transfer of permit responsibility, coverage and liability; and 3) a certification of the continuity of or any changes in operations, wastewater discharge, or wastewater treatment.

If the new permittee is proposing changes in operations, wastewater discharge, or wastewater treatment, the Department may propose modification of this permit in accordance with applicable laws and rules.

#### 14. Operations and Maintenance Manual

For wastewater treatment facilities that serve the public (and are thus subject to Part 41 of the NREPA), Section 4104 of Part 41 and associated Rule 2957 of the Michigan Administrative Code allow the Department to require an Operations and Maintenance (O&M) Manual from the facility. An up-to-date copy of the O&M Manual shall be kept at the facility and shall be provided to the Department upon request. The Department may review the O&M Manual in whole or in part at its discretion and require modifications to it if portions are determined to be inadequate.

At a minimum, the O&M Manual shall include the following information: permit standards; descriptions and operation information for all equipment; staffing information; laboratory requirements; record keeping requirements; a maintenance plan for equipment; an emergency operating plan; safety program information; and copies of all pertinent forms, as-built plans, and manufacturer's manuals.

## PART II

### Section C. Reporting Requirements

Certification of the existence and accuracy of the O&M Manual shall be submitted to the Department at least sixty days prior to start-up of a new wastewater treatment facility. Recertification shall be submitted sixty days prior to start-up of any substantial improvements or modifications made to an existing wastewater treatment facility.

#### 15. Signatory Requirements

All applications, reports, or information submitted to the Department in accordance with the conditions of this permit and that require a signature shall be signed and certified as described in the Clean Water Act and the NREPA.

The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance, shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

The NREPA (Section 3115(2)) provides that a person who at the time of the violation knew or should have known that he or she discharged a substance contrary to this part, or contrary to a permit, COC, or order issued or rule promulgated under this part, or who intentionally makes a false statement, representation, or certification in an application for or form pertaining to a permit or COC or in a notice or report required by the terms and conditions of an issued permit or COC, or who intentionally renders inaccurate a monitoring device or record required to be maintained by the Department, is guilty of a felony and shall be fined not less than \$2,500.00 or more than \$25,000.00 for each violation. The court may impose an additional fine of not more than \$25,000.00 for each day during which the unlawful discharge occurred. If the conviction is for a violation committed after a first conviction of the person under this subsection, the court shall impose a fine of not less than \$25,000.00 per day and not more than \$50,000.00 per day of violation. Upon conviction, in addition to a fine, the court in its discretion may sentence the defendant to imprisonment for not more than 2 years or impose probation upon a person for a violation of this part. With the exception of the issuance of criminal complaints, issuance of warrants, and the holding of an arraignment, the circuit court for the county in which the violation occurred has exclusive jurisdiction. However, the person shall not be subject to the penalties of this subsection if the discharge of the effluent is in conformance with and obedient to a rule, order, permit, or COC of the Department. In addition to a fine, the attorney general may file a civil suit in a court of competent jurisdiction to recover the full value of the injuries done to the natural resources of the state and the costs of surveillance and enforcement by the state resulting from the violation.

#### 16. Electronic Reporting

Upon notice by the Department that electronic reporting tools are available for specific reports or notifications, the permittee shall submit electronically via MiWaters (<https://miwaters.deq.state.mi.us>) all such reports or notifications as required by this permit, on forms provided by the Department.

## PART II

### Section D. Management Responsibilities

#### 1. Duty to Comply

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit, more frequently than, or at a level in excess of, that authorized, shall constitute a violation of the permit.

It is the duty of the permittee to comply with all the terms and conditions of this permit. Any noncompliance with the Effluent Limitations, Special Conditions, or terms of this permit constitutes a violation of the NREPA and/or the Clean Water Act and constitutes grounds for enforcement action; for permit or COC termination, revocation and reissuance, or modification; or denial of an application for permit or COC renewal.

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### 2. Operator Certification

The permittee shall have the waste treatment facilities under direct supervision of an operator certified at the appropriate level for the facility certification by the Department, as required by Sections 3110 and 4104 of the NREPA. Permittees authorized to discharge storm water shall have the storm water treatment and/or control measures under direct supervision of a storm water operator certified by the Department, as required by Section 3110 of the NREPA.

#### 3. Facilities Operation

The permittee shall, at all times, properly operate and maintain all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures.

#### 4. Power Failures

In order to maintain compliance with the effluent limitations of this permit and prevent unauthorized discharges, the permittee shall either:

- a. provide an alternative power source sufficient to operate facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit; or
- b. upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce or otherwise control production and/or all discharge in order to maintain compliance with the effluent limitations and conditions of this permit.

#### 5. Adverse Impact

The permittee shall take all reasonable steps to minimize or prevent any adverse impact to the surface waters or groundwaters of the state resulting from noncompliance with any effluent limitation specified in this permit including, but not limited to, such accelerated or additional monitoring as necessary to determine the nature and impact of the discharge in noncompliance.

## PART II

### Section D. Management Responsibilities

#### 6. Containment Facilities

The permittee shall provide facilities for containment of any accidental losses of polluting materials in accordance with the requirements of the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code). For a POTW, these facilities shall be approved under Part 41 of the NREPA.

#### 7. Waste Treatment Residues

Residuals (i.e. solids, sludges, biosolids, filter backwash, scrubber water, ash, grit, or other pollutants or wastes) removed from or resulting from treatment or control of wastewaters, including those that are generated during treatment or left over after treatment or control has ceased, shall be disposed of in an environmentally compatible manner and according to applicable laws and rules. These laws may include, but are not limited to, the NREPA, Part 31 for protection of water resources, Part 55 for air pollution control, Part 111 for hazardous waste management, Part 115 for solid waste management, Part 121 for liquid industrial wastes, Part 301 for protection of inland lakes and streams, and Part 303 for wetlands protection. Such disposal shall not result in any unlawful pollution of the air, surface waters or groundwaters of the state.

#### 8. Right of Entry

The permittee shall allow the Department, any agent appointed by the Department, or the Regional Administrator, upon the presentation of credentials and, for animal feeding operation facilities, following appropriate biosecurity protocols:

- a. to enter upon the permittee's premises where an effluent source is located or any place in which records are required to be kept under the terms and conditions of this permit; and
- b. at reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect process facilities, treatment works, monitoring methods and equipment regulated or required under this permit; and to sample any discharge of pollutants.

#### 9. Availability of Reports

Except for data determined to be confidential under Section 308 of the Clean Water Act and Rule 2128 (R 323.2128 of the Michigan Administrative Code), all reports prepared in accordance with the terms of this permit and required to be submitted to the Department shall be available for public inspection via MiWaters (<https://miwaters.deq.state.mi.us>). As required by the Clean Water Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Clean Water Act and Sections 3112, 3115, 4106 and 4110 of the NREPA.

#### 10. Duty to Provide Information

The permittee shall furnish to the Department via MiWaters (<https://miwaters.deq.state.mi.us>), within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or the facility's COC, or to determine compliance with this permit. The permittee shall also furnish to the Department, upon request, copies of records required to be kept by this permit.

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.



**PART II****Section E. Activities Not Authorized by This Permit****1. Discharge to the Groundwaters**

This permit does not authorize any discharge to the groundwaters. Such discharge may be authorized by a groundwater discharge permit issued pursuant to the NREPA.

**2. POTW Construction**

This permit does not authorize or approve the construction or modification of any physical structures or facilities at a POTW. Approval for the construction or modification of any physical structures or facilities at a POTW shall be by permit issued under Part 41 of the NREPA.

**3. Civil and Criminal Liability**

Except as provided in permit conditions on "Bypass" (Part II.C.9. pursuant to 40 CFR 122.41(m)), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond the permittee's control, such as accidents, equipment breakdowns, or labor disputes.

**4. Oil and Hazardous Substance Liability**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee may be subject under Section 311 of the Clean Water Act except as are exempted by federal regulations.

**5. State Laws**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

**6. Property Rights**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize violation of any federal, state or local laws or regulations, nor does it obviate the necessity of obtaining such permits, including any other Department of Environment, Great Lakes, and Energy permits, or approvals from other units of government as may be required by law.