PLYMOUTH TOWNSHIP STORMWATER MANAGMENT PLAN (Stormwater Discharge Permit Application)

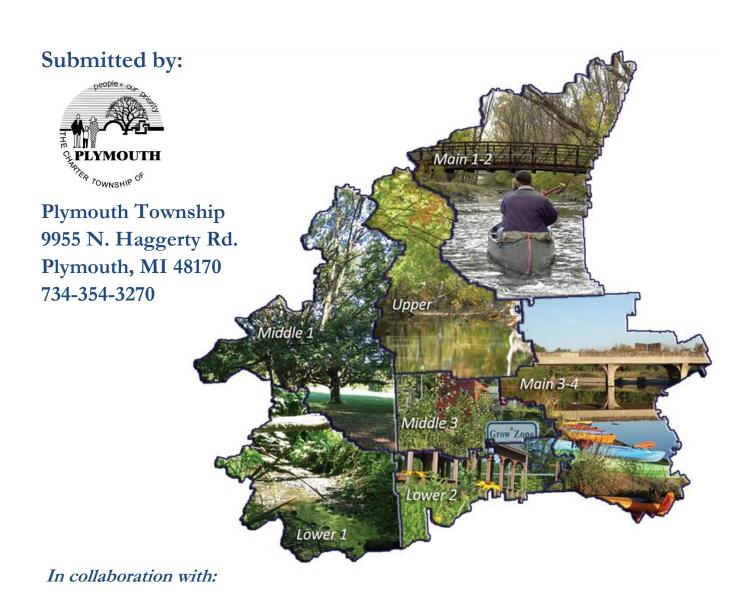




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National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Application Form (Reissuance)

version 1.4

(Submission #: 2EB-52FR-R5RS, version 4)

Details

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

Application Form (Reissuance)

Submission # 2EB-52FR-R5RS

Renewal

Submission

Reason

on

Status Submitted

Form Input

Existing Permit Details

Existing Permit ID (Read Only)

NONE PROVIDED

Existing Permit Number (Read Only)

NONE PROVIDED

Section 1. Applicant Information

Applicant Information

Prefix

NONE PROVIDED

First NameNONE PROVIDED

Last Name
NONE PROVIDED

Title

NONE PROVIDED

Organization Name

Plymouth Charter Township

Phone Type Number Extension

Business 734-354-3270

Email

pfellrath@plymouthtwp.org

Fax

734-453-4793

9955 North Haggerty Road

Plymouth, MI 48170

US

Section 2. MS4 Location Information

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

Charter Township of Plymouth

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

42.3614125,-83.4476866

, ,

Section 3. MS4 Contacts (1 of 1)

CONTACTS

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

Contact

Storm Water Billing Contact Storm Water Program Manager Application Contact

Contact

Prefix

Mr.

First Name
Patrick

Last Name
Fellrath

Title

Director of Public Services

Organization Name

Charter Township of Plymouth

Phone Type Number Extension

Business 734-354-3270

Email

pfellrath@plymouthtwp.org

Fax

734-453-4793

9955 N. Haggerty Rd.

Plymouth, MI 48170

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

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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 than 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

PT Appendix A 1of2.pdf - 07/09/2018 03:36 PM PT App A 2of2.pdf - 10/15/2018 02:31 PM

Comment See Appendix A

Nested Jurisdictions

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

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

Nested Jurisdiction

Prefix

NONE PROVIDED

First Name Last Name NONE PROVIDED

NONE PROVIDED

Title

NONE PROVIDED **Organization Name**

NONE PROVIDED

Phone Type Number **Extension**

NONE PROVIDED NONE PROVIDED

Email

NONE PROVIDED

NONE PROVIDED

[NO STREET ADDRESS SPECIFIED]

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

[NO COUNTRY SPECIFIED]

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

STORM WATER MANAGEMENT PROGRAM (SWMP)

This Application requires a description of the Best Management Practices (BMPs) the applicant will implement for each minimum control measure and the applicable water quality requirements during this permit cycle. The applicant shall incorporate the BMPs to develop a SWMP as part of the Application. The SWMP shall be developed, implemented, and enforced to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable and protect water quality in accordance with the

2/4/2020 1:52:13 PM Page 4 of 21 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 so ordinances and regulatory mechanisms identified in the SWMP. The following question represents the minimum requirement for the ERP. Please complete the question below.

ERP

PT App B ERP.pdf - 07/09/2018 03:36 PM Comment See Appendix B

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

App C Final PPP 02-27-17.pdf - 07/09/2018 03:37 PM Comment

See Appendix C

- 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. See Appendix C, Section B
- 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): See Appendix C, Section D

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Section 6. Public Education Program

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

PEP Procedures

App D Final ARC Collaborative PEP 03-21-17.pdf - 07/09/2018 03:43 PM Comment

See Appendix D

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, Section A

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.

High. See Appendix D, Section C

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.

High. See Appendix D, Section C

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.

High. See Appendix D, Section C

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. Medium. See Appendix D, Section C

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. High. See Appendix D, Section C

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. High. See Appendix D, Section C

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.

High. See Appendix D, Section C

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. High. See Appendix D, Section C

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.

High. See Appendix D, Section C

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- 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. Low. See Appendix D, Section C
- 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, Section D

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 Ellimination Program Procedures

PT_Appendix E_IDEP_2of2.pdf - 03/31/2016 02:48 PM App E Final Collaborative IDEP 09 25 2017.pdf - 07/10/2018 09:30 AM Comment

Appendix E

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 permittees 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)

Division of Public Services, Township Hall, 9955 N. Haggerty Rd., Plymouth

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 C

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 C

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.

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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 so 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, Section D

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, Section D

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, Section D

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, Section D

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, Section D

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 statement at the state unless 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 H, Spill Response Procedure, Section C

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.

This Collaborative and Alternative approach meets and/or exceeds the expected results from minimum control measure requirements as described in Attachment E, Section B.

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, Section E

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

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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, Section D

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, Section F

Illicit Discharge Ordinance or Other Regulatory Mechanism

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

See Appendix E, Attachment E, Table 1

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.

See Appendix E, Attachment E, Table 1

- 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.

See Appendix E, Attachment E, Table 1

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.

See Appendix E, Attachment E, Table 1

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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.

See Appendix E, Attachment E, Table 1

- 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. See Appendix E, Attachment E, Table 1
- 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.

See Appendix E, Attachment E, Table 1

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 Water Quality Management Division

Construction Storm Water Runoff Control

Construction Storm Water Runoff Control Program Procedure Attachment

PT Appendix F Construction 1of1.pdf - 03/31/2016 02:49 PM

Comment

See Appendix F

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, 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, Section D

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, Section B

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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, 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

PT App G PCC.pdf - 07/10/2018 09:37 AM

Comment

See Appendix G

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.

 See Appendix G
- 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.

 See Appendix G

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. <u>USEPA Technical Guidance on Implementing the Stormwater Runoff Requirements</u>

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 See Appendix G

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

See Appendix G

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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)

See Appendix G

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.

See Appendix G

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.

See Appendix G

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

NONE PROVIDED

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

NONE PROVIDED

Site-Specific Requirements

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

 See Appendix G
- 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. See Appendix G

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 a10-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.

NONE PROVIDED

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 applicants 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 applicants 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.

NONE PROVIDED

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.

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.

NONE PROVIDED

- 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.

 NONE PROVIDED
- 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.

 NONE PROVIDED
- 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.

NONE PROVIDED

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- 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. NONE PROVIDED
- 51. Describe the tracking system implemented, or to be implemented, to track off-site mitigation and/or in-lieu projects.

NONE PROVIDED

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

NONE PROVIDED

Site Plan Review

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

 See Appendix G
- **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.

 See Appendix G
- 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.

See Appendix G

Long-Term Operation and Maintenance of BMPs

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

 See Appendix G
- 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.

See Wayne County Stormwater Management Standards, Chapter 9

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. See Wayne County Stormwater Management Standards, Chapter 9

Section 10. Pollution Prevention and Good Housekeeping Program

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Pollution Prevention and Good Housekeeping Program Procedures

PT Appendix H P2GH Attach 1of6.pdf - 03/31/2016 02:52 PM

PT_Appendix H_P2GH_Attach_2of6.pdf - 03/31/2016 02:52 PM

PT_Appendix H_P2GH_Attach_3of6.pdf - 03/31/2016 02:52 PM

PT_Appendix H_P2GH_Attach_4of6.pdf - 03/31/2016 02:53 PM

PT Appendix H P2GH Attach 5of6.pdf - 03/31/2016 02:53 PM

PT Appendix H P2GH Attach 6of6.pdf - 03/31/2016 02:53 PM

PT App.H2 P2GH SpillResponse.pdf - 07/10/2018 09:43 AM

PT App.H1.P2GH General.pdf - 10/15/2018 02:31 PM

Comment

See Appendix H

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 H1, Section D, Table 1

Facilities that may have the high potential to discharge pollutants:

Equipment storage and maintenance facilities Materials storage and Public Works yards

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

Administration buildings and libraries

Fire Stations

Parks

Police Stations

Public golf courses

Public parking lots

Vacant land and open space

Vehicle storage

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

Catch basins Detention basins Vegetated swales

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)

Division of Public Services, Township Hall, 9955 N. Haggerty Rd., Plymouth

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.

Appendix H1, Section C

Facility-Specific Storm Water Management

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

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

- Amount of urban pollutants stored at the site (e.g., sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
- Identification of improperly stored materials

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- 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.

Appendix H1, Section B and C

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 so 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.

Appendix H1, Section D

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

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

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

See Appendix H1, Section D, E, K, L, M, N

- 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 Appendix H1, Section H-P
- 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 Appendix H1, Section P.1
- 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 Appendix H1, Section P.2
- 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 H1, Section H-O

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 H1, Section F & G

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 H1, Section G

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 H1, Section H

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.

<u>Catch Basin Cleaning Activities Guidance Document</u>

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

See Appendix H1, Section J

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 H1, Section O

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 H1, Section Q

Municipal Operations and Maintenance Activities

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

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

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

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

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

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

See Appendix H1, Section J-N

- 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 H1, Section F
- 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 H1, Section G
- 80. Provide the reference to the procedure submitted above identifying the sweeping methods based on the applicant 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 H1, Section I

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 H1, Section J

Managing Vegetated Properties

82. If the applicant specified applicator does not exclusively use ready-to-use products from the original container, provide the reference to the procedure submitted above requiring the applicant specified 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 H1, Section R

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 H1, Section T

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 H1, Section S

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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.

<u>Understanding Impaired Waters and Total Maximum Daily Load (TMDL) Requirements for Municipal Stormwater Programs</u>

Total Maximum Daily Load Implementation Plan

Collaborative TMDL 09 2019 approved.pdf - 09/12/2019 10:55 AM

Comment

See Appendix I

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 sapplication notice, provide the name(s) below. If no TMDL was identified, skip to the next section.

Rouge River Watershed (Biota, E. coli) and Johnson Creek (DO)

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

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

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 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

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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 shall be shaded in the priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities and the priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified with the highest priority facilities because the priority facilities are concerning to the priority facilities based on complaints concerning pollutants discharged to the applicant shall be identified by the priority facilities because the priority facilities are concerning to the priority facilities because the priority facilities are concerning to the priority facilities because the priority facilities because the priority facilities are concerning to the priority facilities because the priority facilities are concerning to the priority facilities because the priority facilities are concerned to the priority facilities are concerned to th

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

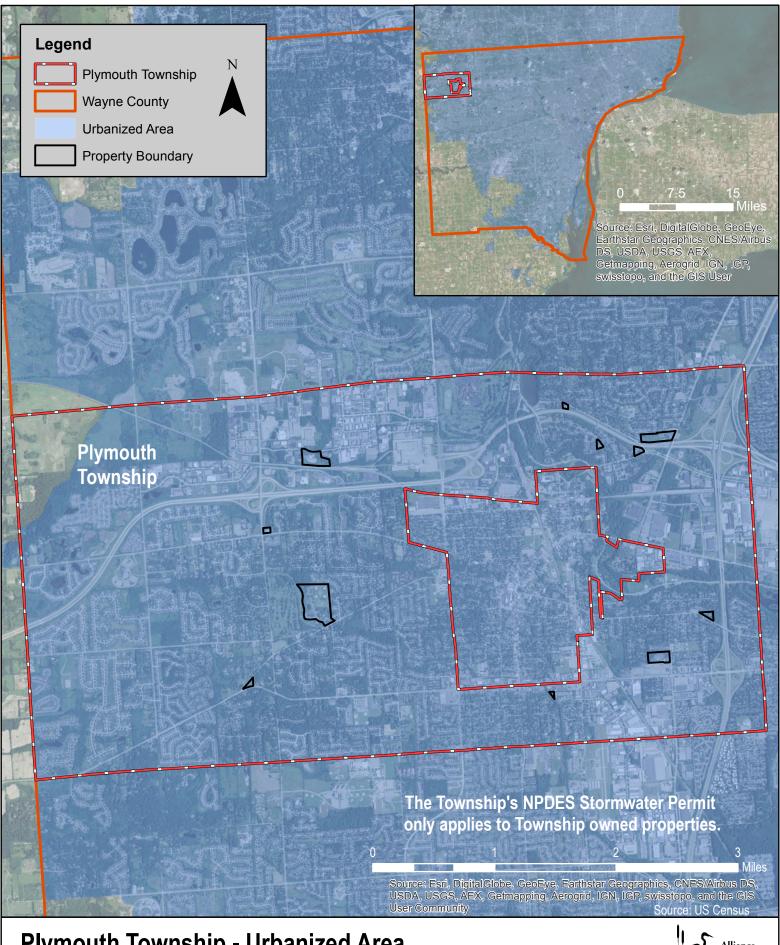
Date	Attachment Name	Context	User
9/12/2019 10:55 AM	Collaborative TMDL 09 2019 approved.pdf	Attachment	Patrick Fellrath
10/15/2018 2:31 PM	PT_App.H1.P2GH_General.pdf	Attachment	Meghan Price
10/15/2018 2:31 PM	PT App A 2of2.pdf	Attachment	Meghan Price

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Date	Attachment Name	Context	User
7/10/2018 9:43 AM	PT_App.H2_P2GH_SpillResponse.pdf	Attachment	Meghan Price
7/10/2018 9:37 AM	PT App G PCC.pdf	Attachment	Meghan Price
7/10/2018 9:30 AM	App E Final Collaborative IDEP 09 25 2017.pdf	Attachment	Meghan Price
7/9/2018 3:43 PM	App D Final ARC Collaborative PEP 03-21-17.pdf	Attachment	Meghan Price
7/9/2018 3:37 PM	App C Final PPP 02-27-17.pdf	Attachment	Meghan Price
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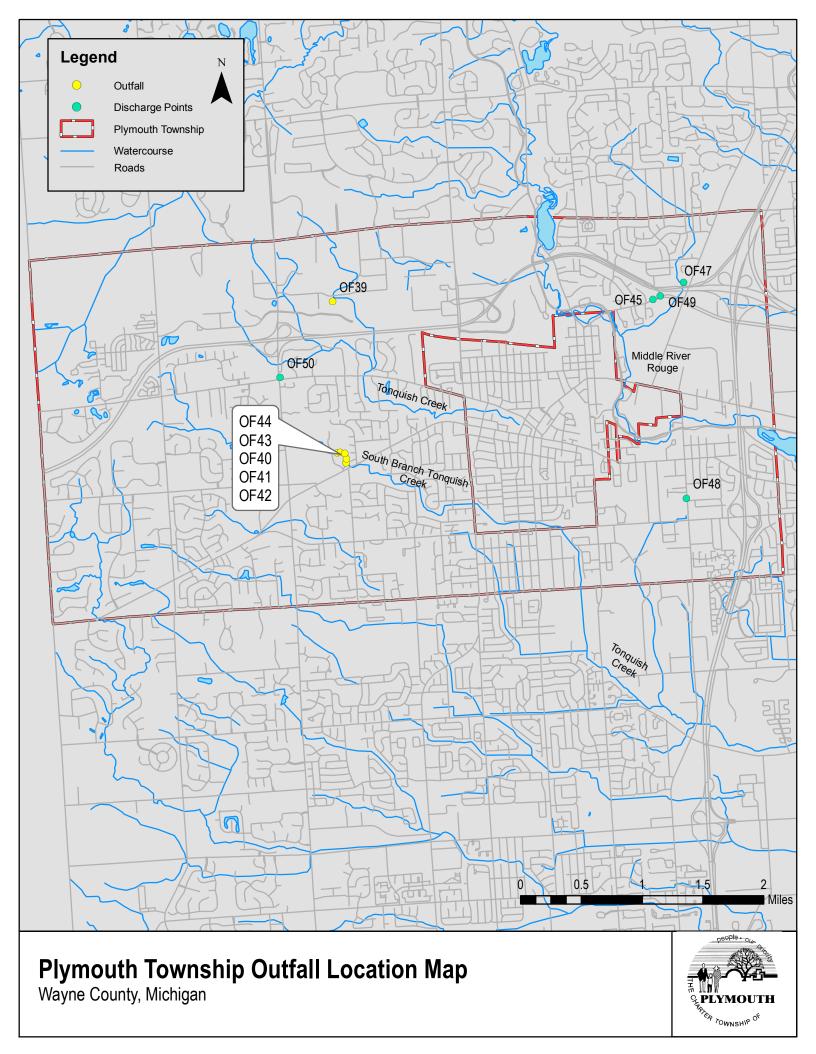
APPENDIX A Outfall and Point of Discharge Information



Plymouth Township - Urbanized Area

Detroit Area Cluster Alliance of Rouge Communities





Plymouth Township Outfall List

Outfall ID	Туре	Receiving Water
OF39	Outfall	Tributary to Tonquish Creek
OF44	Outfall	South Branch Tonquish Creek
OF43	Outfall	South Branch Tonquish Creek
OF40	Outfall	South Branch Tonquish Creek
OF41	Outfall	South Branch Tonquish Creek
OF42	Outfall	South Branch Tonquish Creek
OF45	DischargePoint	Tributary to Middle Rouge River
OF47	DischargePoint	Tributary to Middle Rouge River
OF48	DischargePoint	Tributary to South Branch Tonquish Creek
OF49	DischargePoint	Tributary to Middle Rouge River
OF50	DischargePoint	Tributary to Tonquish Creek

APPENDIX B Enforcement Response Procedure

STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

PREPARED FOR:

THE CHARTER TOWNSHIP OF PLYMOUTH
9955 NORTH HAGGERTY ROAD, PLYMOUTH, MICHIGAN 48170



REVISED: JUNE 2018

SECTION A – PURPOSE

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a procedure for Enforcement Response to address violations of the ordinances or regulatory mechanism identified in the Stormwater Management Plan.

SECTION B – GENERAL PENALTY

Section 1.120 of the General Provisions chapter of the Plymouth Township Code of Ordinances defines the penalties levied by the Township for ordinance violations. The section specifically defines penalties for misdemeanors or civil infractions and continuing violations.

B.1 Section 1.120 – Penalty

"Unless another penalty is expressly provided by this Code for any particular provision or section, every person convicted of a violation of any provision of this Code or any rule or regulation adopted or issued pursuant thereto shall be a misdemeanor and shall be punished by a fine of not more than Five Hundred (\$500) Dollars and costs of prosecution or by imprisonment for not more than Ninety (90) days or by both such fine and imprisonment. Each act of violation and every day upon which any such violation shall occur shall constitute a separate offense. The penalty provided by this section, unless another penalty is expressly provided, shall apply to the amendment of any Section of this Code, whether or not such penalty is re-enacted in the amendatory ordinance."

SECTION C – IDEP ENFORCEMENT RESPONSE PROCEDURE

The enforcement response procedure related to IDEP enforcement can be found in Section E of the River Rouge Collaborative Illicit Discharge and Elimination Plan. As part of this enforcement procedure, Section 1.120 of the Charter Township of Plymouth Code of Ordinances will be used as an enforcement mechanism to extent necessary to ensure corrective action of an illicit discharge by the responsible party.

SECTION D – POST CONSTRUCTION STORMWATER RUNOFF CONTROL ENFORCEMENT RESPONSE PROCEDURE

As stated in the Post Construction Stormwater Runoff Control Standard Operating Procedure, the Township's regulated MS4 is limited to Township owned properties only. Connections to, or the discharge of stormwater to the Township's MS4 is not allowed, therefore, the Township is the only user of their MS4. In the event an unauthorized, physical connection to the Township's MS4 is identified, the Township will deem it as an illicit connection as defined in the Illicit Discharge Prohibition Policy and implement the procedures in Section C above to require its disconnection from the Township's MS4.

SECTION E – ENFORCEMENT TRACKING

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

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

SECTION F - PROCESS FOR REVISION

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

GENERAL PROVISIONS

GENERAL PROVISIONS

1.010. Publication and Distribution of Code.

Publication of the within codification of the ordinances of the Charter Township of Plymouth is hereby directed.

Twenty-one (21) copies of the Code shall be printed and distributed as follows:

Officer	No. of Copies
Supervisor	1
Clerk	2
Treasurer	1
Each Board Member	1
Attorney	1
Chief of Police	2
Fire Chief	1
Dept. of Public Works Manager	1
Community Development	1
Building Official	2
Ordinance Enforcement Officer	1
Director Public Services	1
Each 35th District Court Judge	1

Copies of the original printing of this Code shall be published and made available to the public at a reasonable charge. In addition, the Clerk shall keep one (1) copy of the Code available for public inspection during office hours.

1.020. Amendment Procedure.

This Code shall be amended by ordinance. The title of each amendatory ordinance; adapted to the particular circumstances and purposes of the amendment, shall be substantially as follows:

A.	To amend any section:	
	AN ORDINANCE TO AMEND SECTION OF PART THE CODE OF THE CHARTER TOWNSHIP OF PLYMOUTH.	(or SECTIONS OF
B.	To insert a new section, chapter or part:	
	AN ORDINANCE TO AMEND THE CODE OF THE CHARTER OF PLYMOUTH BY ADDING A NEW SECTION (V SECTIONS, A NEW SECTION AS SECTION OF
C.	To repeal a section, chapter or part:	
	AN ORDINANCE TO REPEAL SECTION, CHAPTER, (as the case may be) OF THE CODE OF THE CHARTER TOWNSHIP OF	, PART

1.030. Publication and distribution of amendments.

Amendments to the Code shall be published as required by law and not less than twenty-one (21) copies of each amendment shall be published suitable for insertion in the copies of the Code. The Township Clerk shall distribute such copies to the officers of the Township having copies of the Code assigned to them. Each officer assigned a copy of the Code shall be responsible for maintaining the same and for the proper insertion of amendatory pages as received. Each copy of said Code shall remain the property of the Township and shall be turned over by each officer having custody thereof upon expiration of his term of office to his successor or to the Township Clerk, in case he shall have no successor.

1.040. Contents of code.

This Code contains all ordinances of a general and permanent nature of the Charter Township of Plymouth dealing with municipal administration, utilities and services; fire prevention; parks and public grounds; streets and sidewalks planning and zoning; energy conservation, subdivision, the State Construction Code; police and traffic regulations; and nuisances.

The adoption of this Code shall not be interpreted as repealing or in any way affecting the Zoning Ordinance as authorizing or permitting any use or the continuance of any use of a structure or premises in violation of any ordinance of the Township in effect on the date of adoption of this Code. All ordinances

of a general and permanent nature in effect on the effective date of this Code are hereby repealed except as otherwise provided herein; provided, however, that any sections or parts of any such ordinance which are not permanent and general in nature as herein defined and which are severable from the remainder of such ordinances are saved from repeal.

1.050. Short title.

This ordinance may be known and cited as the "Charter Township of Plymouth Code".

1.060. Headings.

No provision of this Code shall be held invalid by reason of deficiency in any Chapter or Section heading.

1.070. Responsibility.

Whenever any act is prohibited by this Code, by an amendment thereof or by any rule or regulation adopted thereunder, such prohibition shall extend to and include the causing, securing, aiding or abetting of another person to do said act.

1.080. Definitions.

The following words and phrases, when used in this Code and any amendment thereto, shall for the purposes of this Code have the meanings respectively ascribed to them in this section except in those instances where the contest clearly indicates a different meaning.

- A. "Person" shall include any individual, co-partnership, corporation, association, club, joint adventure, estate, trust and any other group or combination acting as a unit and the individuals constituting such group or unit.
- B. "Public Place" shall mean any place to or upon which the public resorts or travels, whether such place is owned or controlled by the Township or any agency of the State of Michigan or is a place to or upon which the public resorts or travels by custom or by invitation, express or implied.
- C. "Street", "Highway" and "Alley" shall mean the entire width subject to an easement for public right of way or owned in fee by the Township, County or State, of every way or place, of whatever nature, whenever any part thereof is open to the use of the public as a matter of right for purposes of public travel. The word "alley" shall mean any such way or place providing a secondary means of ingress and egress from a property.
- D. "Sidewalk" shall mean that portion of a street between the curb lines or lateral lines and the right of way lines which is intended for the use of pedestrians.
 - E. "Township" shall mean the Charter Township of Plymouth.

1.090. <u>Title of officer to include deputy or subordinate.</u>

Whenever, by the provisions of this Code, any officer of the Charter Township of Plymouth is assigned any duty or empowered to perform any act or duty, the title of said officer shall mean and include such officer or his deputy or authorized subordinate.

1.100. Tense/gender.

Except as otherwise specifically provided or indicated by the content, all words used in this Code indicating the present tense shall not be limited to time of adoption of this Code but shall extend to and include the time of the happening of any act, event or requirements for which provision is made herein, either as a power, immunity, requirement or prohibition and any words denoting masculine gender shall include the feminine gender.

<u>1.110.</u> Notice.

Notice regarding sidewalk repairs, sewer or water connections, dangerous structures, abating nuisances or any other act, the expansion of which if performed by the township may be assessed against the premises under the provisions of this Code shall be served:

- A. by delivering the notice to the owner personally or by leaving the same at his residence, office or place of business with some person of suitable age and discretion;
 - B. by mailing said notice by certified or registered mail to such owner at his last known address;
- C. if the owner is unknown, by posting said notice in some conspicuous place on the premises at least five (5) days before the act or action concerning which the notice is given. No person shall interfere with, obstruct, mutilate, conceal or tear down any official notice or placard posted by a Township officer, unless permission is given by said officer to remove said notice; or,
 - D. as otherwise specified in this Code.

<u>1-120.</u> Penalty.

Unless another penalty is expressly provided by this Code for any particular provision or section, every person convicted of a violation of any provision of this Code or any rule or regulation adopted or issued pursuant thereto shall be a misdemeanor and shall be punished by a fine of not more than Five Hundred (\$500) Dollars and costs of prosecution or by imprisonment for not more than Ninety (90) days or by both such fine and imprisonment. Each act of violation and every day upon which any such violation shall occur shall constitute a separate offense. The penalty provided by this section, unless another penalty is expressly provided, shall apply to the amendment of any Section of this Code, whether or not such penalty is re-enacted in the amendatory ordinance.

1.130. Severability.

It is the legislative intent of the Board in adopting this Code that all provisions and sections of this ordinance be liberally construed to protect and preserve the peace, health, safety and welfare of the inhabitants of the Township; and should any provision or section of this ordinance be held unconstitutional or invalid, such holding shall not be construed as affecting the validity of any of the remaining provisions or sections, it being the intent that this ordinance shall stand, notwithstanding the invalidity of any provision or section thereof.

The provisions of this section shall apply to the amendment of any section of this Code, whether or not the wording of this section is set forth in the amendatory ordinance.

1.140. Effective date.

This ordinance Code shall take effect in accordance with the terms of the ordinance which adopts the ordinance Code.

APPENDIX C

Collaborative Public Participation/Involvement Program (PPP)
Click here for link to Collaborative PPP Plan

APPENDIX D

Collaborative Public Education Program (PEP) Click here for link to Collaborative PEP Plan

APPENDIX E

Collaborative Illicit Discharge Elimination Plan (IDEP)
Click here for link to Collaborative IDEP

APPENDIX F Construction Stormwater Runoff Control

STANDARD OPERATING PROCEDURE CONSTRUCTION STORMWATER RUNOFF CONTROL PROGRAM

PREPARED FOR:

THE CHARTER TOWNSHIP OF PLYMOUTH 9955 N HAGGERTY ROAD, PLYMOUTH, MICHIGAN 48170



APRIL 2016

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 Best Management Practices (BMPs) to meet the minimum control measure requirements for the construction stormwater runoff control program to the maximum extent practicable. The Charter Township of Plymouth does not administer a Part 91 program and is not a designated municipal enforcement agency. The following standard operating procedure provides a description of the procedures the Township employs for construction site runoff control that includes notification procedures and ensuring proper permits are obtained by those disturbing greater than one acre of soil.

SECTION B – NOTIFICATION PROCEDURE

The Township will notify the Wayne County Water Quality Management Division (WCWQMD) when soil or sediment is discharged into the Township's MS4 in a quantity that could negatively impact surface waters of the state. Complaints received by the Township will be referred to WCWQMD within 24 hours.

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

SECTION C – MEASUREABLE GOALS

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

- Number of Part 91 related complaints received and referred to the County by the Township building inspector.
- Number of Part 91 permits issued by the County within the Township.

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

SECTION D – REPORTABLE DISCHARGES

The Township 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 Appendix H of the Stormwater Management Plan (SWMP), the Township will notify the MDEQ through the Pollution Emergency Alert System (PEAS) at 1-800-292-4706.

SECTION E -STATE OF MICHIGAN PERMIT BY RULE

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

SECTION F – PROCESS FOR REVISION

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

APPENDIX G Post-Construction Stormwater Runoff Program

STANDARD OPERATING PROCEDURE POST CONSTRUCTION STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE CHARTER TOWNSHIP OF PLYMOUTH
9955 NORTH HAGGERTY ROAD, PLYMOUTH, MICHIGAN 48170



REVISED: JUNE 2018

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 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 – DESIGN STANDARDS FOR TOWNSHIP PROPERTIES

The Township's regulated MS4 is limited to Township owned and maintained properties only. Connections to, or the discharge of stormwater to the Township's MS4 is not allowed. Therefore, the Township is the only user of their MS4. Township led development or redevelopment projects, that are disturb at least one or more acres, shall comply with the following design requirements for the discharge of stormwater to waters of the state:

B.1 Water Quality Performance Standard

- Provide treatment of the first inch of runoff or 90% of all runoff-producing storms from the tributary area associated with the area of development or redevelopment.
- When needed, rainfall data will be obtained from either the MDEQ memo dated March 24, 2006 or Wayne County's stormwater management standards to determine the runoff generated from 90% of all runoffproducing storms.
- Provide treatment on a site-specific basis to reduce post-development total suspended solids discharge concentration by 80% or achieve a discharge concentration of 80 mg/L or less when compared to pre-development conditions.

B.2 Channel Protection Standard

 Provide storage so there is no net increase in offsite runoff volume and rate for storm events up to the 2-year, 24-hour storm event from that of predevelopment conditions.

B.3 Site Specific Standards

 In areas of known oil or groundwater contamination, stormwater management measures will be specified so that existing conditions are not exacerbated.

Pre-development is defined as the land use immediately prior to the new development/redevelopment.

SECTION C – SITE PLAN REVIEW PROCESS

Site plans associated with development and redevelopment projects undertaken on Township property will be reviewed by the Township Engineer, or their designee, to determine compliance with the design standards contained in this policy.

SECTION D – LONG TERM MAINTENANCE

The long-term maintenance of structural and vegetative best management practices installed as a result of this policy will be maintained in perpetuity. As such, the procedure for the long-term maintenance of these best management practices will be incorporated into the Township's Pollution Prevention/Good Housekeeping standard operating procedure.

SECTION E – 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 maintenance violations of constructed BMPs on Township properties
- Number of instances where the Township had to undertake corrective measures on Township properties

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

SECTION F – PROCESS FOR REVISION

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

APPENDIX H Pollution Prevention and Good Housekeeping

Appendix H1 Standard Operating Procedure Pollution Prevention and Good Housekeeping

GENERAL PROCEDURES

PREPARED FOR:

THE CHARTER TOWNSHIP OF PLYMOUTH
9955 N HAGGERTY ROAD, PLYMOUTH, MICHIGAN 48170



REVISED: SEPTEMBER 2018

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 Best Management Practices (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

Charter Township of Plymouth owned and operated facilities have been assessed for their potential to discharge pollutants to the waters of the state. Each facility will be evaluated based on the following criteria as outlined in the NPDES permit application:

- 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 water bodies
- 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 has been rated high, medium, or low. For low priority facilities where no assessment factors are present, catch basin cleaning and street sweeping will be performed as indicated in the applicable procedures for these activities. For medium 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 that are included in this document.

SECTION C - UPDATES AND PRIORITY REVISION

This inventory will be updated within 120 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments will be revised within 120 days of discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

The following table identifies the Township's owned or operated facilities with a discharge of stormwater to surface waters of the state. **Table 1** includes a list of properties owned or operated by the Township that have stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state.

Table 1

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPW Facility	Catch Basins (9) Dumpsters (3) Stockpiles (6) Underground Storage Tanks (2)	High	1, 3, 4	See Sections G-P
Township Hall & Fire Station #1	Catch Basins (20) Storm Manholes (2) Detention Basin (1)	Low	1	Catch basin cleaning Street sweeping Basin maintenance
Fire Station #2	Catch Basins (3)	Low	1	Catch basin cleaning Street sweeping
Fire Station #3	Catch Basins (15) Detention Basin (1)	Low	1	Catch basin cleaning Street Sweeping Basin maintenance
Township Recreational Park	Catch Basins (40) Storm Manholes (4) Bioswale (1)	Low	1	Catch basin cleaning Street Sweeping Swale maintenance
Lake Pointe Soccer Park	Catch Basins (44) Storm Manholes (3) Detention Basin (1)	Low	1	Catch basin cleaning Street Sweeping Basin maintenance
Friendship Station Senior Center	Dry Wells (2)	Low	1	Dry well cleaning Street Sweeping

In addition to the properties listed in **Table 1**, the Township owns additional properties with no structural stormwater controls installed. These properties are designated low priority and include Township parks and vacant lots.

SECTION E – SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

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

E.1 Inventory and Description of Materials and Activities

The majority of the Township's Division of Public Works (DPW) operations are conducted at their 46555 Port Street facility. Site-specific procedures and inspection forms are incorporated into this General SOP. This site is considered a high priority site due the following operations:

DPW Facility – 46555 Port Street

- Fuel Storage and Use
- Vehicle and Equipment Maintenance and Cleaning
- Stockpiled Materials
- General Refuse and Recycling

SECTION F –PRIORITIZATION CRITERIA OF STREET SWEEPING AND CATCH BASIN INSPECTIONS

The criteria for prioritizing Township parking lot/access drive sweeping and catch basin cleaning activities has been defined as described below.

High Priority have one or more of the following criteria:

- Immediately adjacent to stockpiles or potentially polluting materials that are not equipped with secondary containment measures or other BMPs;
- Frequently used, City-owned and maintained parking lots that have a high potential for pollutant runoff; and/or
- Receive drainage from unpaved roadways and/or parking lots.

Medium Priority basins have one or more of the following criteria:

- Immediately adjacent to stockpiles or potentially polluting materials that have with secondary containment measures or other BMPs;
- Associated with a downtown shopping district;
- Streets within the municipality zoned as industrial with heavy truck traffic; and/or
- City-owned and maintained streets with moderate traffic volumes (speed limit greater than 30 mph).

Low Priority have one or more of the following criteria:

- City-owned parking lots with no material storage or handling;
- Catch basins located within vegetated areas; and/or
- City-owned and maintained streets with low traffic volumes.

SECTION G - SCHEDULE OF STREET SWEEPING AND CATCH BASIN INSPECTIONS

The frequency of parking lot/access drive sweeping and catch basin inspections associated with each priority level is provided in **Table 2** below.

Table 2

Maintenance Activity	Priority Level – Schedule				
	High	Medium	Low		
Street Sweeping (Parking Lots, Access Drive)	4x /year	2x /year	1x /year (Spring)		
Catch Basin Inspections	2x /year	1x /year	1x /permit cycle		

A summary of the municipal properties and their designated priority level is provided in **Table 3** below, followed by the criteria by which the specific priority levels were determined.

Table 3

Maintenance Activity	Priority Level – Municipal Properties				
	High	Low			
Street Sweeping	DPW Facility	None	All Other Township-		
(Parking Lots, Access					
Drive)			Access Drives		
Catch Basin Inspections	DPW Facility	None	All Other Township-		
			Owned Catch Basins		

The DPW Facility is classified a high priority due to the presence of material stockpiles, fuel tanks, and the storage and use of other polluting materials. The Township does not own or operate any major thoroughfares that would be classified a high priority.

The Township does not own or maintain public roads. The Township owns and maintains parking lots and driveways on Township-owned parcels only, such as Township Recreational Park and Lake Pointe Soccer Park. All Township-owned parking lots and catch basins, except for the DPW Facility, are classified as low priority due to their limited potential for pollutant runoff or other environmental impacts.

If the DPW receives a complaint, a determination of the area will be made by DPW staff to increase sweeping on a more frequent interval as well as to reclassify the area to a higher priority rating. Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPW if on Township property. At that time, it will be determined if the catch basin will require maintenance on a more frequent interval and warrants a reclassification to a higher priority rating.

In the event a priority rating is changed for catch basin inspections or parking lot/access drive sweeping, this procedure will be updated within 120 days.

SECTION H – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING METHODOLOGY

Catch basins are visually inspected during normal work activities or if a complaint is registered by a resident. A visual inspection of the structure will identify any structural defects which may include collapse, cracking, frame damage, pipe collapse, blockage, etc. and will be documented using a standardized form. Structural repairs are prioritized based on public safety concerns. During the inspection, if it is determined that the catch basin sump is 50% full of accumulated sediment and debris, it will be cleaned promptly and advanced to the next higher priority inspection level. DPW staff utilizes a Vactor truck to remove all solids and liquids from the structure to the extent possible. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property or within Wayne County or Michigan Department of Transportation (MDOT) right of way (ROW) are not inspected, cleaned, or maintained by the Township.

The catch basins at the DPW Facility that are located near the material storage areas are equipped with a filter insert (or "silt sack") to prevent sediment and debris from entering the storm sewer. The filter inserts are inspected for integrity and amount of sediment accumulated during the monthly routine inspection.

SECTION I – STREET SWEEPING METHODOLOGY

Street sweeping activities are conducted by the Township's DPW staff using mechanical street sweeping equipment according to the manufacturers operating instructions. Collected sediment from street sweeping activities is disposed of as described in Section J.

SECTION J – DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance and street sweeping activities is stored temporarily at the DPW facility in a roll-off dumpster before being disposed of by a licensed hauler. Dewatering of these waste materials is not conducted at Township property. Two (2) other dumpsters at the DPW facility are kept on site for recycling only. The dumpsters are not used for the disposal of hazardous materials and are to be closed or covered at all times.

SECTION K – ROAD, PARKING LOT, AND SIDEWALK MAINTENANCE

Driveway, parking lot, and sidewalk maintenance activities includes pothole repair, sidewalk repair/replacement, and curb and gutter repair. These services are addressed by DPW field staff or Township contractor on an as needed basis. If performed by DPW field staff, bagged materials are purchased in quantities as needed to reduce waste. Left over supplies are stored in bags indoors; however, broken concrete and earthen materials are temporarily stored in the outside yard in designated stockpile areas at the Township DPW facility and covered with a tarp. In cases where a contractor is retained to perform these activities, a Township representative is on site to oversee the work and ensure that left over material, concrete washout, and other associated pollutants are disposed of properly. Disposing of concrete washout and other excess repair materials into the storm sewer is strictly prohibited by the Township.

K.1 Stockpiled Materials

Designated stockpile areas are located in the outside storage area at the DPW facility. Materials are stockpiled at this location infrequently and include topsoil, sand, gravel, mulch, and other earthen materials as needed. When not in use, the stockpiles are covered with a tarp to minimize erosion.

SECTION L – WINTER OPERATIONS

The Township applies bagged salt purchased in as-needed quantities only. There is no bulk storage of road salt or brine located on Township property. Rock salt is applied via usage of a riding tractor and/or a passenger truck with an attached broadcast spreader that is calibrated at the commencement of the season. Only sidewalks and walkways at Township property are treated by DPW personnel or occupants of the Township building. A third-party contractor is utilized for snow removal throughout the Township. Snow storage areas will be designated in locations that enable runoff to be directed to landscaped areas for infiltration, be filtered through

a vegetated buffer, or be otherwise treated prior to entering streams, wetlands or the storm sewer system.

SECTION M – FUEL STORAGE AND USE

Two underground storage tanks (USTs) are installed at the Township DPW Facility; these include a 2,000-gallon gasoline UST and a 1,000-gallon diesel fuel UST. Part 5 Rules indicate that fuel storage areas "shall be designed, constructed, maintained, and operated to prevent the release of polluting materials through sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater's of this state." The Township has met this requirement through the proper storage and pollution prevention methods currently in place. These include the following:

- The fuel USTs are located outside within a designated fueling area. They are equipped with an emergency power shut-off and an automated leak detection and volume monitoring controls system. The tanks are only filled on an as-needed basis.
- Bulk liquid tanker delivery vehicles will only be allowed on site if contact has been made with properly trained (certified) personnel and it has been confirmed that these personnel will be present at the delivery point.
- Properly trained personnel will be in attendance to monitor the entire fuel transfer process. They are authorized to terminate or to order the driver to terminate the transfer and have the driver move the tanker in case of an emergency. Attending personnel will be alert, have an unobstructed view of the cargo tank connections and be within 25 feet of the cargo tank during transfer operations.
- Properly trained DPW staff will direct the tanker for proper positioning, verify, and provide access to the correct fill port. Access to other fill ports or unlocking pipeline caps in anticipation of other delivery vehicles is strictly prohibited.
- Wheel chocks or other approved methods to prevent the tanker from moving during the transfer process or driving off without following proper disconnection practices will be required.
- Inspection of the truck to ensure that there are no leaks will be conducted before and after the transfer operation.
- Hose connections will be reviewed and verified prior to the transfer.
- The available volume of the tank will be verified prior to transfer to prevent overfilling.
- During removal of the transfer lines, trained staff will ensure that excess material is drained into the appropriate receiving tank or receptor to prevent a release of materials to the environment.
- Trained staff will monitor the termination process and inspect the lower most tanker manifold for evidence of leaks or damage prior to the tanker's departure.
- A spill kit will be stationed next to the storage tanks at all times.

A fueling log is maintained to track and record the volume of fuel dispersed for Township vehicles and equipment. Completion of these logs is mandatory and used as a secondary control to track the volume of fuel stored in the tanks.

All other vehicle fluids are stored the DPW garage in minimal quantities in an area that is connected to the sanitary sewer. Vehicle maintenance activities are contracted out to a third party.

SECTION N – VEHICLE WASHING

All vehicle washing activities are conducted inside the DPW garage. Vehicle wash water is discharged to the sanitary sewer system via floor drains which are directed through an oil/water separator before entering the sanitary sewer system.

Vehicle maintenance activities are contracted to a third party and performed off-site for the Township's entire vehicle fleet. A maintenance log is maintained by the Township which is used to document all vehicle maintenance and repair activities.

SECTION O – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and pavement sweeping programs, the Township also performs inspections of Township owned detention basins and swales.

O.1 Detention Basin Inspection and Maintenance

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

O.2 Swale Inspection and Maintenance

Vegetated swales are inspected annually to evaluate erosion problems, damaged vegetation, and sedimentation and debris accumulation. Sediment and debris removal is needed if it is inhibiting drainage. Annual mowing is conducted to ensure safety, aesthetics, proper swale operation, and to suppress weeds and invasive vegetation.

The Township does not have any other structural controls that are owned or maintained by the Township. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 120 days.

SECTION P – NON-STRUCTURAL CONTROLS

The Township is committed to employing preventive maintenance practices through the use of several nonstructural controls to prevent stormwater pollution. These nonstructural controls are

everyday types of activities undertaken by employees at the DPW facility. The non-structural controls implemented at the DPW facility are as follows:

P.1 Routine Inspections and Good Housekeeping Procedures

Preventive maintenance involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. DPW foremen meet with field staff daily to discuss daily assignments and objectives. Good housekeeping practices include keeping the facility neat and orderly, properly storing and covering materials, and minimizing pollutant sources to prevent or minimize pollutant runoff. The purpose of these inspections is to identify and prevent conditions that could lead to stormwater pollution. A log of corrective actions will be kept on file at the DPW facility.

Routine inspections of stormwater management and control structures are conducted to ensure materials and equipment are clean and orderly and to prevent or minimize pollutant runoff. These routine inspections are conducted and documented on a monthly basis. A Routine Inspection Form has been created for the facility and is included at the end of this SOP. Completed routine inspection forms are kept on file at the DPW facility.

Staff inspect all vehicles consistent with Commercial Driver's License Procedures and performs detailed vehicle inspections every two weeks. Completed vehicle maintenance records and fueling logs are kept on file at the DPW facility.

P.2 Comprehensive Site Inspections

The comprehensive site inspection will include but not be limited to the areas and equipment identified in the preventive maintenance program, good housekeeping procedures, structural and non-structural controls, a review of the routine preventive maintenance reports, and any other paperwork associated with this SOP. The entire DPW facility will be evaluated during the comprehensive inspection. In contrast to the routine inspections, comprehensive inspections will focus on areas that have a reasonable potential for significant materials to contaminate stormwater runoff. The comprehensive site inspection for DPW areas will be conducted once every six (6) months. Documentation of the comprehensive site inspection results will be prepared and kept on file for three years. The report shall identify any incidents of non-compliance with the SOPs. If there are no reportable incidents of non-compliance, the report shall contain a certification that the facility is in compliance. The Comprehensive Site Inspection and Report Form that will be used for each inspection is included at the end of this SOP.

SECTION Q – NEW APPLICANT OWNED FACILITIES

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

SECTION R – CERTIFIED PESTICIDE APPLICATOR

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

SECTION S – 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 Township participates in training opportunities that are made available by SEMCOG, Wayne County, the Alliance of Rouge Communities, and others as deemed appropriate. Employee training components for the Township's DPW field staff includes:

Employees Trained	Training Description and Frequency
	Upon hire, employees will:
	 View the Municipal Storm Water Pollution Prevention Storm Watch training video.
New Township DPW	 Read and become familiar with the Township's SOPs.
Employees	 Perform at least one Routine Inspection and one Comprehensive Inspection with a current Township employee.
	Participate in a job shadow program where new staff is paired with
	an experienced staff member for 30 days.
	Once per permit cycle:
	View the Municipal Stormwater Pollution Prevention Storm Watch
All Township DPW	training video.
Employees	Review proper materials storage and handling.
Limployees	 Review good housekeeping and pollution prevention practices.
	Review examples of illicit discharges to the storm sewer system
	Review Township's Spill Response Procedures
Vov.staff	Attend relevant training workshops by the Alliance of Rouge
Key staff	Communities, SEMCOG, or others, when available.

SECTION T – CONTRACT REQUIREMENTS AND OVERSIGHT

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

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

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

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

Contractor training will be conducted during project kick-off or pre-construction meetings. Training will include instruction and informational hand-outs such as the attached "General Construction Site Waste Management" fact sheet adapted from the US Environmental Protection Agency website. Training will be focused on project work as much as possible; available fact sheets on specific work activities such as the attached "Silt Fences" and "Concrete Washout" will be used if applicable.

SECTION U – PROCESS FOR REVISION

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

INSPECTION FORMS

Dept. of Public Works

Charter Township of Plymouth ROUTINE PREVENTIVE MAINTENANCE AND GOOD HOUSEKEEPING INSPECTION FORM

NPDES MS4 Permit

*Complete this inspection every month. It is not necessary to complete this inspection during the same month the Comprehensive Inspection is conducted. Maintain completed copy in site files.

Name:			Date/Time:				
Title:			Weather:				
Significant Materials / Activity	Location		Status, Corrective Action Needed?			Corrective Action Date, Initials	
Fueling Area (Gasoline, Diesel; spill kit)	Exterior						
Stockpiled Materials	Exterior						
General Refuse and Recyclable Materials, Dumpsters	Exterior						
Street Sweeping Debris, Roll-Off Dumpster	Exterior						
Storm Water Catch Basins and Silt Sacks	Exterior						
Other Inspection Notes:							
			YES	NO	Follow-Up Requi	ired?	
Are good housekeeping practices being maintained?							
Is all preventive maintenance of equipment performed in areas that will not release pollutant into storm water run-off?							
Do any areas of exposed soil and/or erosion need to be addressed?							
	Signature:						

Charter Township of Plymouth Dept. of Public Works

COMPREHENSIVE SITE INSPECTION AND REPORT FORM (EVERY 6 MONTHS)

NPDES MS4 Permit

*Complete this inspection every 6 months. It is not necessary to complete the Routine Preventive Maintenance and Good Housekeeping Inspection during the same month this inspection is conducted. Maintain completed copy in site files.

Name:			Date/	Time	:			
Title:			Weather:					
Significant Materials / Activity	Location		Statu: Need		Corre	ective	Action	Corrective Action Date, Initials
Fueling Area (Gasoline, Diesel; spill kit)	Exterior							
Stockpiled Materials	Exterior							
General Refuse and Recyclable Materials, Dumpsters	Exterior							
Street Sweeping Debris, Roll-Off Dumpster	Exterior							
Storm Water Catch Basins and Silt Sacks	Exterior							
Storm Water Detention Basins	Exterior							
Vehicle and Equipment Wash Area	Interior, Garage							
Other Inspection Notes:								
			YES	N	10	Follow	-Up Requi	red?
Are good housekeeping practices being maintained?								
Is all preventive maintenance of equipment performed in areas that will not release pollutant into storm water run-off?								
Do records exist of preventive maintenance activities conducted during the past 6 months since the last Comprehensive Inspection?								
Do any areas of exposed soil and/addressed?	or erosion need to be							

Charter Township of Plymouth Dept. of Public Works

COMPREHENSIVE SITE INSPECTION AND REPORT FORM (EVERY 6 MONTHS)

NPDES MS4 Permit

	YES	NO	Follow-Up Required?		
Are there any non-storm water discharges?					
Has any training been completed in past 6 months concerning stormwater controls and preventive maintenance? If so, what?					
I certify that the facility is in compliance with the Storm Water Pollution Prevention Planning SOP.					
Signature:			Date:		

Appendix H2 Standard Operating Procedure Pollution Prevention and Good Housekeeping

SPILL RESPONSE

PREPARED FOR:

THE CHARTER TOWNSHIP OF PLYMOUTH
9955 N HAGGERTY ROAD, PLYMOUTH, MICHIGAN 48170



REVISED: MAY 2018

SECTION A – PERSONNEL

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

Name	Phone
Township Police Dispatch – Spill Coordinator	(734) 354-3248
Township Fire Chief – Spill Coordinator	(734) 354-3221
Township DPS Director – Spill Coordinator	(734) 354-3270
Township DPW Foreman – Spill Coordinator	(734) 564-2853

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	
Township Police Dispatch – Spill Coordinator	Plymouth Township Police Department	(734) 354-3248
Township Fire Chief – Spill Coordinator	nip Fire Chief – Spill Coordinator Plymouth Township Fire Department	
Township DPS Director – Spill Coordinator	Plymouth Township DPS	(734) 354-3270
Township DPW Foreman – Spill Coordinator	Plymouth Township DPW	(734) 564-2853
MDEQ 24-Hour Pollution Emergency Alerti	1-800-292-4706	
MDEQ Southeast Michigan District Office	(586) 753-3700	
City of Detroit Wastewater Treatment Plan	(313) 267-7401	
National Response Center	1-800-424-8802	

The Township's Fire Department has its own hazardous material response procedure that will be used in conjunction with this procedure for general Township staff.

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, overpack 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.

<u>Small Spills:</u> 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.

- Quickly control the spill by stopping or securing the spill source. This could be
 as simple as up-righting a container and using floor-dry or absorbent pads to
 soak up spilled material. Wear gloves and protective clothing, if necessary.
- Put spill material and absorbents in secure containers if any are available.
- Consult with the Facility Responsible Person and the SDS for spill and waste disposal procedures.
- Use Dry Cleanup Methods and **never** wash spills down the drain, onto a storm drain or onto the driveway or parking lot.
- Both the spilled material and the absorbent may be considered hazardous waste and must be disposed of in compliance with state and federal environmental regulations.

<u>Medium Spills:</u> 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.

<u>Large Spills:</u> 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

Within ten (10) days of release, submit a written report 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/deq/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
- 20 Absorbent Pads
- 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.

APPENDIX I

Total Maximum Daily Loads (TMDL) Click here for link to Collaborative TMDL