

Attachment 7
To MDEQ Stormwater Discharge Permit Application

(Facility Table 3)
(Pollution Prevention Procedure)

Pollution Prevention Procedure
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Pollution Prevention and Good Housekeeping Program:

61. Provide the procedure for updating and revising the inventory in Question 59 and map (or maps) identified in Question 60 as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. A suggested timeframe for updating/revising the inventory and map(s) is 30 days following adding/removing a facility or structural stormwater control.

Maps will be revised/updated yearly during the annual inspection process.

62. Provide the procedure for assessing each facility identified in Question 59 for the potential to discharge pollutants to surface waters of the state. The procedure shall include a process for updating and revising the assessment.

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

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

The procedure for updating and revising each facility assessment is 30 days prior to discharging stormwater from a new facility and within 30 days of determining a need to update/revise the facility assessment
All of the facilities listed were reviewed for during this process.

69. Provide the procedure 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 62 and 63.

See SWPPP Table 3. The Fuel station is scheduled for monthly inspections and bi-annual inspections. All other facilities have bi-annual inspections.

70. Provide the procedure 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.

Procedure:
During bi-annual inspections any problems should be addressed before the next inspection. Usually all facilities are inspected on the same day.

71. Provide the geographic location of the catch basins in each priority level using either a narrative description or map.

Narrative Description: Medium level priority – see SOP 1 (Fuel Station between two parking areas).
Low Level priority – see SOP 1-4

72. Provide the procedure 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. *A compliance assistance document titled Catch Basin Cleaning Activities Guidance Document is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf.*

*You may have already referenced this for your High Priority Facilities, but now they want to know the procedure for inspecting, cleaning and maintaining ALL your catch basins. If you do not cleanout or maintain your own catchbasins, your procedure needs to explain how you are going to ensure your contractor will meet the requirements in the Guidance Document referenced by the State. **Reference in Application***

Procedure for inspection: The Fuel station is scheduled for monthly inspections and bi-annual inspections. All other facilities have bi-annual inspections.

Procedure for cleaning and maintaining: The Township is seeking bids from outside sources to clean and maintaining the catch basins at our facilities. The successful bidder must comply with the Catch Basin Cleaning Activities Guidance Document referred to above.

73. Provide the procedure for dewatering and disposal of materials extracted from catch basins. *A compliance assistance document titled Catch Basin Cleaning Activities Guidance Document is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf.*

The Township is seeking bids from outside sources to clean and maintaining the catch basins at

our facilities. The successful bidder must comply with the Catch Basin Cleaning Activities Guidance Document referred to above.

74. Provide the procedure for inspecting and maintaining the structural stormwater controls identified in Question 59, excluding the structural stormwater controls included in an SOP as part of Question 64 and catch basins.. The procedure shall include a description and schedule for inspecting and maintaining each structural stormwater 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 stormwater.** The procedure shall include a process for updating/revising the procedure to ensure a maintenance and inspection program for each structural stormwater control.

Not applicable.

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

The Township does not have any structural stormwater controls but in future if we acquire or build any new structural stormwater controls for water quantity they will be designed and implemented in accordance with the post-construction stormwater runoff control performance standards and long term operation and maintenance requirements listed in the Ordinance to be adopted by October 1, 2014. See attachment 2 "G".

76. Provide the procedure with the assessment of the applicant's operation and maintenance activities 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:

- Road, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)
- Bridge maintenance
- Right-of-way maintenance
- Unpaved road maintenance

- 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)

Procedure (with assessment) of operation and maintenance activities:
 See SWPPP Table 3, No pollutants are stored in any of our parking lots. Each driveway is swept manually, as needed. Spill controls are in place at the Fire Department near the fuel station.

77. Provide the procedure 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.*

We do not sweep our lots but we do inspect catch basins bi-annually and we contract maintenance of the catch basins. No pollutants are stored in any of our parking lots. Each driveway is swept manually, as needed. Spill controls are in place at the Fire Department near the fuel station.

78. Provide the geographic location of the streets, parking lots, and other impervious surfaces in each priority level using either a narrative description or map.

See attached Map 1

79. Provide the procedure identifying the sweeping methods based on the applicant's sweeping equipment and use of additional resources in sweeping seasonal leaves or pick-up of other materials.

Not applicable.

80. Provide the procedure for dewatering and disposal of street sweeper waste material. *A compliance assistance document titled Catch Basin Cleaning Activities Guidance Document is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf,*

Not applicable.

81. Provide the procedure requiring the applicant's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land. A description of the categories is located at http://www.michigan.gov/mdard/0,4610,7-125-1569_16988_35289-11992--,00.html

Not Applicable: We do not apply herbicides or pesticides except those ready to use products in their original containers that are not required to be applied by a licensed applicator.

82. Provide the employee training program to train employees involved in implementing 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 new hires within the first year of their hire date.

How does your community make sure your employees get trained. There is a good housekeeping manual available online. The County does provide periodic training. You do not have to have ALL your staff attend training. You can have 1 or 2 staff bring the training back and train in house. Reference in Application:

Program: We have been attending the trainings provided by the Genesee County Drain Commission.

Schedule: Training must be attended at least once every 5 years and new hires are to be trained within 1 year of hire.

83. Provide the procedure 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.

As a provision of any contract, the contractor will be required to provide record of proper disposal.