



# MS4 Permitting

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Water Resources Division – DEQ

# What to expect today

- Walk through with examples
- Ask questions
- Understand the process and next steps



# MIWATERS

- HAVE YOU CREATED YOUR ACCOUNT?
- ACCOUNT USERS
- HAVE YOU SUBMITTED YOUR CERTIFIER AGREEMENT FORM?
- WHERE DO I LOCATE THE APPLICATION?



# THE APPLICATION



- ALL ONLINE
- ATTACHMENT AND REFERENCE STYLE QUESTIONS
- \*\*\*REQUIRED QUESTIONS\*\*\*



# MS4 Individual Permits

- Considers permittee type and complexity of the MS4
- Builds on existing efforts/activities
- Alternatives approved at time of application
- Application aligns with audit process

# Reissuance Timing

## FY18 Basin Year Cycle

October 2016	Application notice letters mailed
April 3, 2017	Application due in MiWaters
After April 2017	Application reviewed and approved Permit issued

# Application Format

Application produces a SWMP

- ✓ 6 minimum control measures
- ✓ Water quality requirements

**Complete Application = SWMP**

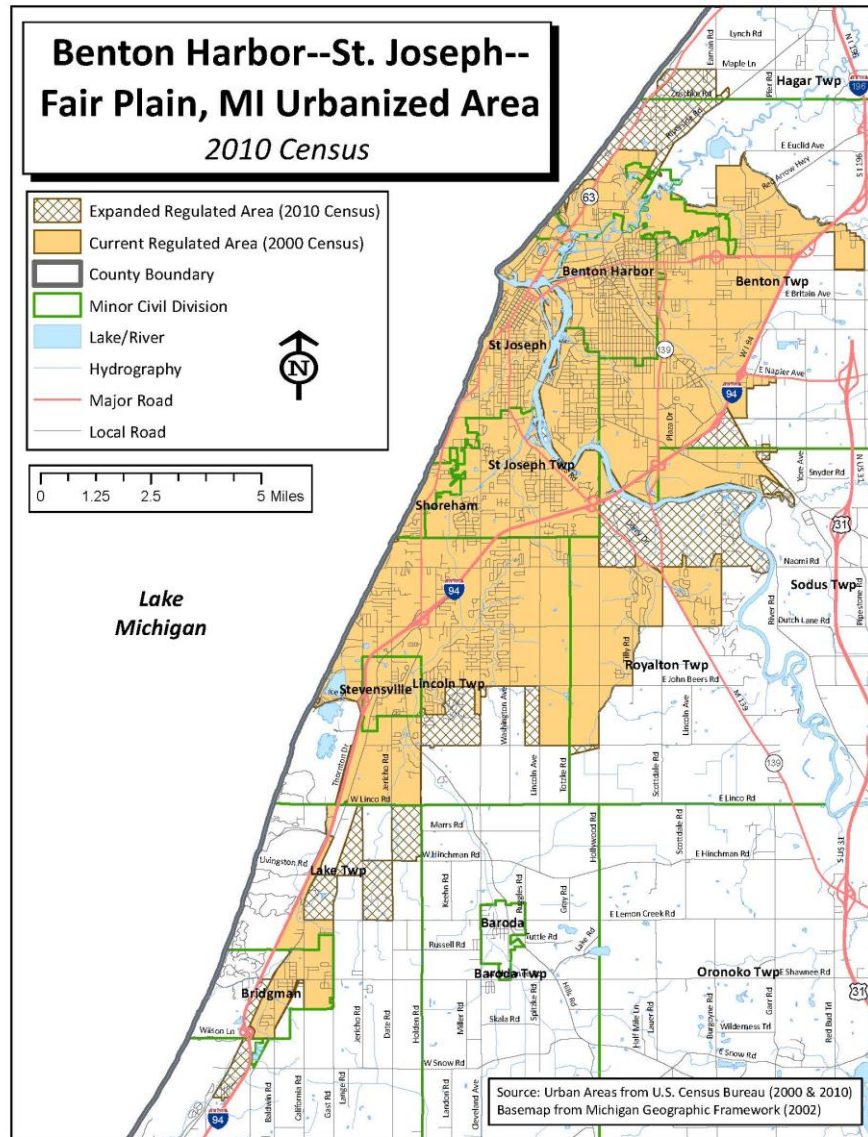


# Application Format

- Minimum Control Measures
  - Public Participation/Involvement Program
  - Public Education Program
  - Illicit Discharge Elimination Program
  - Construction Stormwater Runoff Control Program
  - Post-Construction Stormwater Runoff Program
  - Pollution Prevention and Good Housekeeping Program
- Water Quality Requirements
  - Total Maximum Daily Load Implementation Plan



# Regulated Area



# Scope of the MS4 Permit



MS4 or surface water of the state?

# MS4

**System designed or used to collect or convey stormwater**

Enclosed pipes, road side  
ditches, swales, roads,  
and parking lots

Structural controls



# Surface Waters of the State

Lakes, rivers, streams,  
wetlands, and open drains

**Not** a system constructed  
solely to convey stormwater



# Outfalls and Points of Discharge

## *Outfall*

Discharge from an MS4 directly to surface waters

## *Point of Discharge*

Discharge from an MS4 to another MS4



# Nested Jurisdictions

**Nested Jurisdictions:** Permit holder assumes responsibility for permit requirements

Answer application requirements to include nested MS4



# Stormwater Management Program

Structural and nonstructural BMPs to be implemented during the permit cycle

Designed to reduce the discharge of pollutants to the **maximum extent practicable (MEP)**



# Collaborative Efforts

Option to collaborate:

- PPP
- PEP
- IDEP
- Construction Storm Water
- TMDL Implementation Plan



*SAW grant funding supports collaborative efforts*



# Options Available

Option to prioritize:

- PEP
- IDEP
- Pollution Prevention & Good Housekeeping

Alternative options included:

- IDEP
- Post-Construction



# Measurable Goals

## Include a measurable goal for each BMP

- Schedule for implementation (months and years)
- Interim milestones
- Frequency of the BMP



# Measurable Goals

## Measure of Assessment

May use the same assessment to measure several BMPs



# Measurable Goals

Measure success of the BMP at reducing pollutants to the MEP?

- ✓ Changes in behavior
- ✓ Track number of BMPs
- ✓ Documented water quality improvements

EPA guidance document

*"Measurable Goals Guidance for Phase II Small MS<sub>4</sub>s"*

# What is a Procedure?

- **Written Process**
  - **Policy**
  - **Other mechanism describing how the minimum requirement will be implemented**
- 
- A photograph of a grassy field with yellow wildflowers and a road in the background. The field is in the foreground, and the road is on the right side. There are trees in the background.

# Referenced Information

MiWaters continues to allow:

- Referenced information in any format
- Prompts applicant to include a specific reference within the procedure/ordinance/regulatory mechanism

# Public Participation/Involvement Program

## Procedure: Make SWMP available for public inspection and comment

The screenshot shows the City of Lansing Public Service website. The header includes the City of Lansing logo, the tagline "Where Michigan Works!", a search bar, and a welcome message from Mayor Virg Bernero. The main navigation menu includes "Visitors", "Residents", "Work", "Departments", and "Contact". The "Public Service" section is active, and the "Stormwater Management Plan" is highlighted. The page content includes a list of attachments, contact information for Chad Gamble, and sections for "Help Us Implement the Stormwater Management Plan" and "Help Us Improve the Stormwater Management Plan".

Where Michigan Works!  
**City of Lansing**  
Welcome. Please contact me if I can help you in any way.  
-Mayor Virg Bernero

Visitors Residents Work Departments Contact

Public Service

Divisions

Projects

Current Traffic Advisories

CART: Capital Area Trash and Recycling

Streets

Sidewalks

Biking and Walking the City

SeeClickFix and Nixie

Wet Weather Control Program

**Stormwater**

- Stormwater Management Plan
- Stormwater Controls for Development
- Stormwater Pollution Prevention Initiative
- Annual Reports

**Stormwater Management Plan**

The City of Lansing's Stormwater Management Plan is comprised of its National Pollutant Discharge Elimination System Permit Application and the following attachments:

1. Table 1-MS4 Outfall Locations
2. Enforcement Response Procedure
3. Attachment A-Public Education Plan
4. Attachment A-Action Plan
5. Attachment B-IDEP
6. IDEP Prioritized Areas
7. Attachment C-SOPs
8. Attachment D-SESC Procedures
9. Attachment E-Construction SW Runoff Control
10. Attachment F-Post Construction
11. Post-Construction Design Manual
12. Post-Construction Policy Manual
13. Attachment G-Good Housekeeping

Chad Gamble  
Public Service

Contact  
7th Floor City Hall  
124 W Michigan Ave  
Lansing, MI 48933  
Ph: 517-483-4455  
Fax: 517-483-6082  
cgamble@lansingmi.gov

HOURS  
Monday through Friday  
8:00 a.m. to 5:00 p.m.

Recycling  
Monday through Thursday  
8:00 a.m. to 4:00 p.m.

Capital Area Recycling & Trash  
Monday through Thursday  
8:00 a.m. to 4:00 p.m.

Help Us Implement the Stormwater Management Plan

Explore the articles and brochures included on this website to help discover what you can do to help preserve and protect our lakes, rivers and streams.

Volunteer. Many organizations have volunteer opportunities, such as river cleanup events (Board of Water & Light) and macroinvertebrate sampling (Mid-Michigan Environmental Action Council). See Stormwater Links. Hop on over to the GLRC website for more information.

Help Us Improve the Stormwater Management Plan

Send or email us your comments and suggestions

The screenshot shows the Waverly Community Schools website. The header includes the school district logo, the name "WAVERLY COMMUNITY SCHOOLS", and a search bar. The main navigation menu includes "Departments", "Board Of Education", "Parents & Students", "Information", and "Contact Us". The "Stormwater Management" page is active, and the page content includes a "Why worry about stormwater?" section, a "Why Worry About Stormwater?" link, and a "Do not pour anything" warning.

DISTRICT HIGH SCHOOL MIDDLE SCHOOL EAST ELMWOOD WINANS

**WAVERLY**  
COMMUNITY SCHOOLS

Departments Board Of Education Parents & Students Information Contact Us

Home > Stormwater Management

### Stormwater Management

Stormwater Management

**Why worry about stormwater?** Click here to learn more about the importance of stormwater.  
[Why Worry About Stormwater?](#)

The District has developed a comprehensive Storm Water Management Program as required by the Environmental Protection Agency. The program is designed to help the District improve the quality of the storm water discharged from District facilities. The written plan is available for review through the Custodial, Grounds, and Maintenance Office, 3809 W. St. Joseph, Lansing, MI. If you have any questions or wish to review the plan, please call 517.321.1088 ext. 3402.

Storm Water drains are for rain water. Drains which may be near curbs in the streets or in field areas carry rainwater and other items that wash off the streets are called storm drains. The grate that prevents large objects from flowing into the storm system is called a catch basin. Storm drains are located outside and are not connected to the system of pipes that carries waste water to a treatment plant.

Anything dumped into the storm drains flows directly into a pond, stream, river, or some other body of surface water without any treatment.

Sanitary Sewers are for waste water. Indoor drains (sinks, bathtubs, washing machines, toilets, etc.) go to a sanitary sewer. These drains are connected to a series of piping that carries waste water to treatment plant. Once at the treatment plant the harmful materials are removed so that the water leaving the plant is safe for the environment. Sanitary sewers are not designed to carry storm water.

We make a difference. What can we do? Do not pour anything (motor oil, gas, fertilizer, cleaning agents, etc.) in a storm drain that would have a negative impact on the quality of our water system.

Do not pour anything (motor oil, gas, fertilizer, cleaning agents, etc.) in a storm drain that would have a negative impact on the quality of our water

# Public Participation/Involvement Program

**Procedure:** Invite the public to participate in the implementation and review of the SWMP

- ✓ Website
- ✓ Meetings
- ✓ Watershed Groups

**GREATER LANSING REGIONAL COMMITTEE FOR STORMWATER MANAGEMENT**

HOME ABOUT

### EVENTS

Search

Date/Time	Event
11/16/2015	GLRC PEP Committee Meeting
2:00 pm - 3:30 pm	Tri-County Regional Planning C
12/02/2015	MWEA Watershed & Stormwater
8:30 am - 4:00 pm	Eagle Eye Banquet Facility, East
12/03/2015	GLRC IDEP Committee Meeting
1:30 pm - 3:30 pm	Tri-County Regional Planning C
12/10/2015	GLRC Executive Committee Meeting
8:00 am - 9:30 am	Tri-County Regional Planning C
12/10/2015	GLRC Full Committee Meeting
9:30 am - 11:00 am	Tri-County Regional Planning C

Powered by Events Manager

**NORTHVILLE TOWNSHIP, Michigan**

Welcome Government Services Agendas I Want To...

Search

### ROUGE RIVER WATERSHED

Events in the Watershed

- Catch Basins
- Septic System Maintenance
- Tree Gardens, Pops, Barrels
- Storm Water Management
- Maps

#### Where Does the Water Go?

All rain water that falls on your yard eventually ends up in the Johnson Creek/Rouge River and finally the Lake Erie. Keeping your yard free of contaminants helps prevent pollution. The tip cards to the right identify simple steps you can take to help improve the local water quality.

To follow the rain water from your home - click [here](#) to be directed to our mast!

#### Events in the Watershed

Many opportunities are available to volunteer or become educated in the environment, specifically as it relates to storm water quality and improvement. Below, check out the upcoming events. Be sure to also check out our partner's links for their upcoming events and opportunities.

#### Alliance of Rouge Communities

Northville Township is a member of the Alliance of Rouge Communities. This nonprofit group was established out of numerous communities in the watershed to help improve water quality in our creeks, rivers and the lakes. Please [click here](#) to visit their website for upcoming events.

The ARC will be hosting a septic system workshop. This is a beneficial event for those new to septic systems or those concerned with the operation of their existing system.

#### Friends of the Rouge

The Friends of the Rouge is another nonprofit organization in the Rouge River Watershed that supports improvement in water quality. They provide various events and educational opportunities throughout the year. Please [click here](#) to visit their website to learn more and get involved in protecting our environment.

Find out how to save your property from erosion, protect water quality and maintain the value of your home. [Click here](#) for more information on workshops provided by the Friends of the Rouge.

#### Rouge Rescue 2015

Thank you to our friends at ASSIN, FOTR and the Northville Swim Team! We had wonderful

#### Mailing Lists

##### Water Quality Management

This Mailing List receives various education materials for Water Quality Management. [Click here to subscribe.](#)

#### WHAT YOU CAN DO WITH LANDSCAPING

The chemicals in herbicides and pesticides pollute our waterways if washed from lawns and gardens into storm drains and roadside ditches.

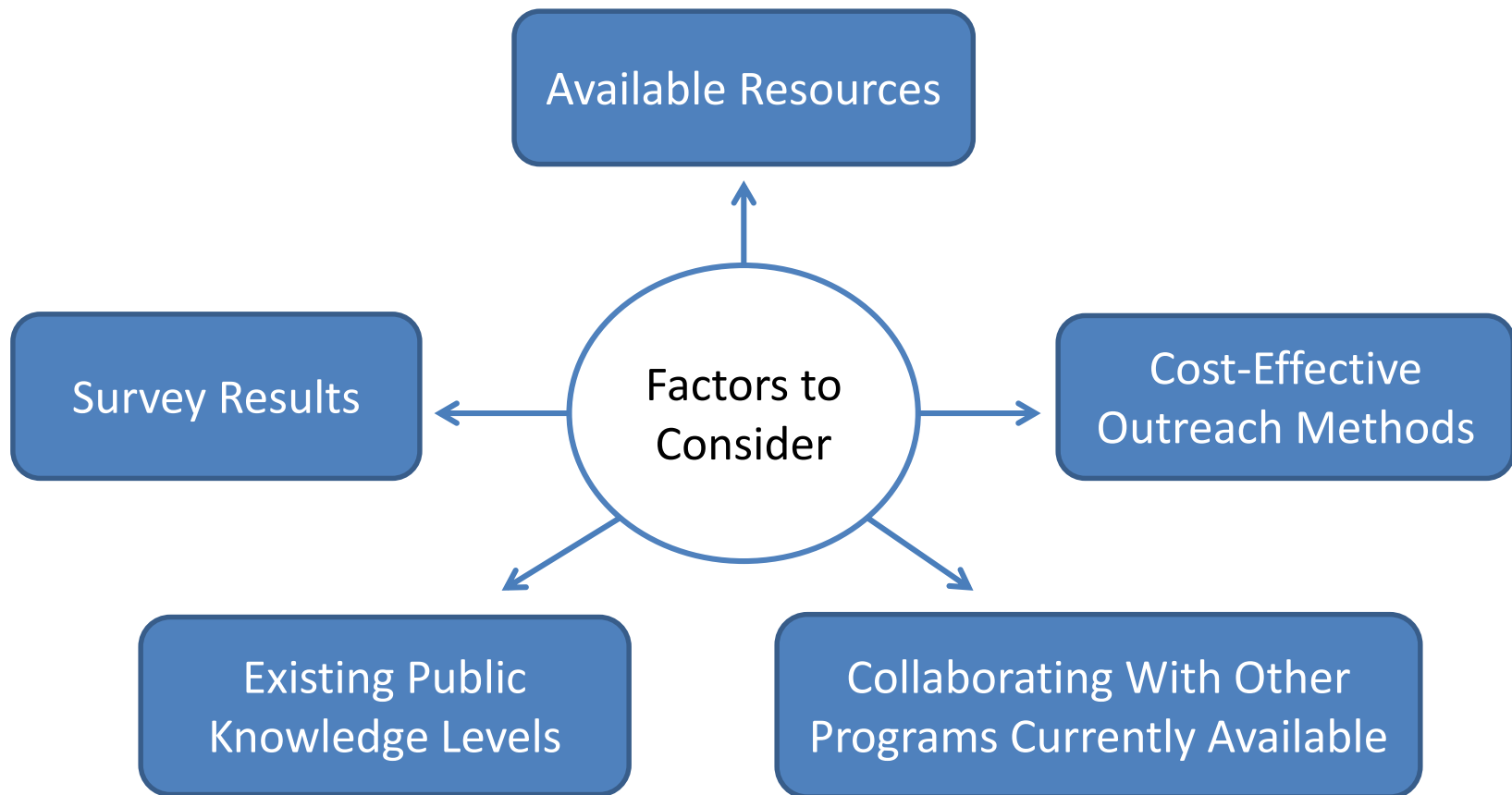
**Help keep our rivers, lakes, and beaches clean**

ANNUAL REPORTS [View All >](#)



# Public Education Program

Assessment of high priority and targeted issues



# Public Education Program

- 10 topics
- Some topics not applicable for permittee type
- Option to prioritize: high, medium or low



# Public Education Program

## Procedure for evaluating and determining effectiveness

- Method for assessing changes in public awareness/behavior
- Process for modifying the PEP to address ineffective implementation



# Enforcement Response Procedure

**Procedure:** Expected response to violations to compel compliance with IDEP and Post-Construction ordinances or regulatory mechanisms

- ✓ Written notices
- ✓ Citations
- ✓ Fines



# Enforcement Response Procedure

Describe a method for tracking the following information:

- ✓ Name of the person/entity responsible for violation
- ✓ Date of violation
- ✓ Location of violation
- ✓ Description of the violation
- ✓ Description of the enforcement response used
- ✓ Schedule for returning to compliance
- ✓ **Date violation was resolved**



# Illicit Discharge Elimination Program

What is an illicit discharge?  
Who can cause or contribute to one?



# Illicit Discharge Elimination Program

Location of up-to-date storm sewer map

- ✓ Do not submit
- ✓ Could be many maps



# Illicit Discharge Elimination Program

## **Dry-Weather Screening Options:**

1. Screen all outfalls and points of discharge
2. Prioritize screening in areas with high illicit discharge potential
3. Alternative

*Opportunity to collaborate on all options*



# Illicit Discharge Elimination Program

Prioritization Criteria	Key Characteristics to Consider for Prioritization
Poor Dry Weather Water Quality	Areas where TMDLs have been developed to address pollutants that could originate from illicit discharges or where the available data shows dry-weather water quality criteria are exceeded two or more times in a year are high priorities.
Density of Aging On-Site Disposal Systems (OSDS)	Older septic systems that have exceeded their design life may have failure rates of 25 to 30 percent or more. Areas where the OSDS designs would not be permitted today because of poor soils or small lot sizes, but where older OSDS are still in operation, have a high illicit discharge potential.
Aging or Failing Sewer Infrastructure	Areas where sewer age exceeds its design life; and where clusters of pipe breaks, spills, overflows, or infiltration and inflow are known problems should be given a high priority.
Discharge Complaints and Reports	Any MS4s owned or operated by the permittee with a history of discharge complaints should be given a high priority.
Age and Density of Industrial Operations	Older industrial operations often have floor drains, waste handling areas, gray water, and sanitary facilities connected to storm sewers. Industrial areas also commonly have storm water pollutants related to poor housekeeping practices, so a higher density of industrial operations increases the likelihood of contaminated discharges.
Age of Development	Areas where the average age of the majority of the development exceeds 50 years should be given a higher priority.
Sewer Conversion Areas	Areas where sanitary sewers were added in the last 30 years, and people switched from septic systems, have a high potential for illicit taps of sanitary water to MS4s.
Historic Combined Sewer Systems	Sewer systems that were once combined, but were subsequently separated, have a high illicit discharge potential if oversight of the projects was not documented.
Type of Commercial Activity	Businesses not regulated by industrial storm water permits, especially those that handle liquids, including oils and greases (e.g., auto maintenance, food service, and carpet cleaners) may remain unaware of storm water pollution concerns from improper waste disposal and “hopper juice” from the trash bins and compactors they operate.
Other Potential Pollutant Generating Sites	Conditions unique to the permittee’s jurisdiction should be considered.

Excerpted From:  
[\*Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assistance\*](#)

# Illicit Discharge Elimination Program

## Up-to-date storm sewer map



## Narrative

- 2015 – 17 Mud Lake Drain outfalls
- 2016 – 13 Sycamore Creek outfalls and 3 Reynolds Drain outfalls
- 2017 – 18 Red Cedar River outfalls

# Illicit Discharge Elimination Program

## Procedure for performing field *observations*

- Submit a field sheet with the observations
- Include a schedule for the permit cycle
  - % of outfalls and points of discharge screened each year
  - Specific areas to be screened
- Optional Interagency Agreement



**IDEP Compliance Assistance Document available at**  
**[www.michigan.gov/deqstormwater](http://www.michigan.gov/deqstormwater)**

# Illicit Discharge Elimination Program

**Procedure** for performing field *screenings*, include indicator parameters



**Procedure** for performing source *investigation*



Include a schedule for implementing  
(*e.g., 24 hours or within 2 business days*)



# Illicit Discharge Elimination Program

- **Procedure** for responding to illegal dumping/spills
- If prioritizing, **procedure** for responding to illicit discharges outside of priority areas

Include a schedule:



- ✓ Responding to complaints
- ✓ Performing field observations and follow-up field screening and source investigations



# Illicit Discharge Elimination Program

**Procedure** for reporting a release of polluting materials from the MS<sub>4</sub> to surface/groundwaters of the State

*Do you store polluting materials above the Part 5 threshold management quantities?*

Salt  
5 tons  
1000 gallons

Oil  
1320 gallons in AST

*Immediately report spills above threshold reporting quantities:*

Salt  
50 pounds  
50 gallons

Oil – Any quantity that causes unnatural turbidity, color, visible sheens, oil films, foams, solids, or deposits in the receiving waterbody

# Illicit Discharge Elimination Program

## **Equivalent Alternative Approaches**

- Option to propose an alternative approach
- Demonstrate how the approach provides an equivalent or greater level of protection as the dry-weather screening application requirements

# Illicit Discharge Elimination Program

**Procedure** for responding to illicit discharges when source identified

- ✓ Specify expected corrective action
- ✓ Include a schedule to eliminate the illicit discharge and pursue enforcement actions
- ✓ Address illegal spills/dumping



Consider a schedule of 30 days to eliminate  
*most* illicit discharges

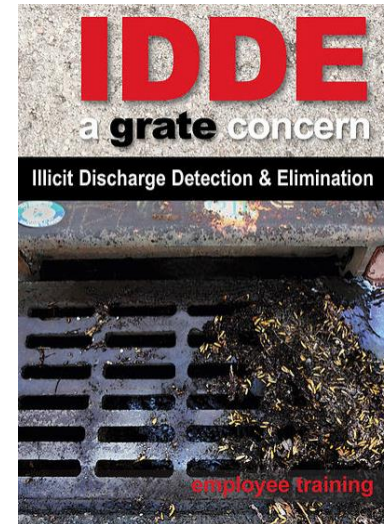


# Illicit Discharge Elimination Program

## IDEP training program

**Staff:** Part of their normal job responsibilities may come into contact with an illicit discharge

**Schedule:** Once during the permit cycle and new hires within first year of hire



How to Spot and Report Stormwater Pollution



NCTCOG ED

Subscribe 63

1,517

# Illicit Discharge Elimination Program

## **Procedure** for evaluating and determining effectiveness

- ✓ Prioritization process
- ✓ Different detection methods
- ✓ Different enforcement methods
- ✓ Program efficiency

Include a schedule for evaluating (e.g., annual review)



# Illicit Discharge Elimination Program

In effect ordinance or regulatory mechanism

- ✓ Prohibits non-stormwater discharges
- ✓ Regulates the contribution of pollutants
- ✓ Prohibits illicit discharges, illicit connections, and direct dumping/disposal
- ✓ Establishes authority to inspect, investigate, and monitor suspected discharges
- ✓ Requires and enforces the elimination of illicit discharges

# Illicit Discharge Elimination Program

## Ordinance or Regulatory Mechanism?

<ul style="list-style-type: none"><li>➤ <b>Cities and villages</b></li><li>➤ <b>Townships with a more complex MS4</b> (e.g., a township that owns or operates roads)</li></ul>	<p>Primary Legal Authority: <b>Ordinance</b></p> <p>Secondary Legal Authority: <b>Policies and procedures for staff to implement IDEP activities</b></p>
<ul style="list-style-type: none"><li>➤ <b>County agencies</b></li><li>➤ <b>Townships with a regulated MS4 limited to township-owned property</b></li><li>➤ <b>Public institutions</b> (e.g., school systems and universities)</li></ul>	<p>Primary Legal Authority: <b>Regulatory Mechanism</b></p>

# Illicit Discharge Elimination Program

Non-stormwater discharges that do not need to be prohibited (Application Requirements #21-22)

## Firefighting Activities

Not a significant contributor of pollutants to surface waters



## Other Non-Stormwater Discharges or Flows

Not a significant contributor to violations of WQS



# Construction Stormwater

Questions focus on identifying existing efforts under other qualifying local programs

Are you a Part 91 agency?

- County Enforcing Agency
- Municipal Enforcing Agency
- Authorized Public Agency
- Rely on another Part 91 Agency

# Construction Stormwater

**Procedure:** Notifying the Part 91 agency or appropriate staff when soil and sediment is discharged to the MS4 from a construction activity

- Complaints
- Notification requirements
- Internal and/or external process



# Construction Stormwater

**Procedure:** Notify the DEQ when soil, sediment, or other pollutants are discharged to the MS<sub>4</sub> from a construction activity



Applicant determines when and under what circumstances the DEQ will be contacted





# Construction Stormwater

**Procedure:** Construction activity  $\geq 1$  acre with the potential to discharge to the MS<sub>4</sub> obtains a Part 91 permit or is conducted by an approved APA

**Procedure:** Advise the landowner or recorded easement holder of the State of Michigan Permit by Rule



# Scope of the MS4 Permit



MS4 or surface water of the state?

# Post-Construction Runoff

Ordinance or regulatory mechanism to address stormwater runoff from new development and redevelopment projects

- Private, commercial & public projects
- Projects that disturb  $\geq 1$  acre projects,  $< 1$  acre that are part of a larger common plan of development



# Post-Construction Runoff

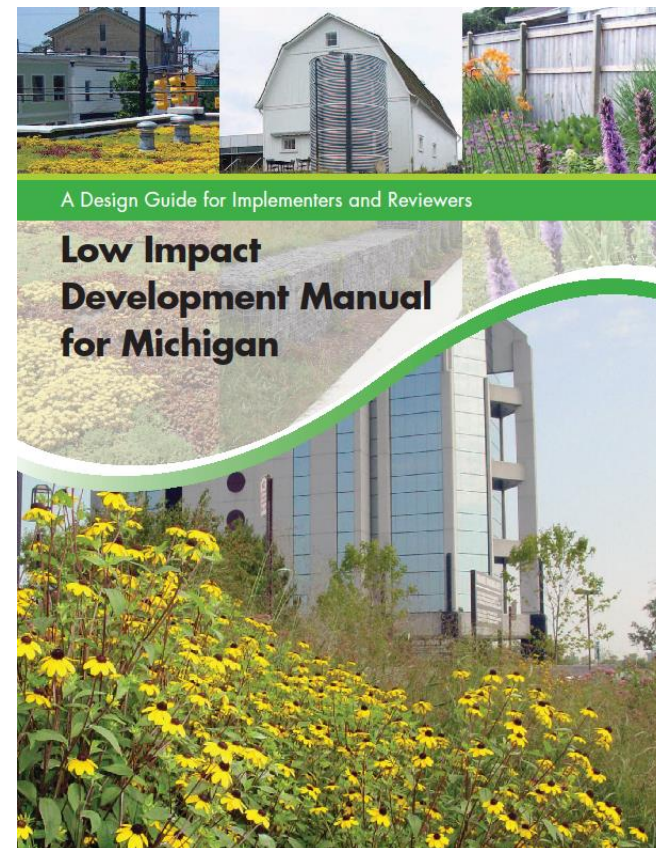
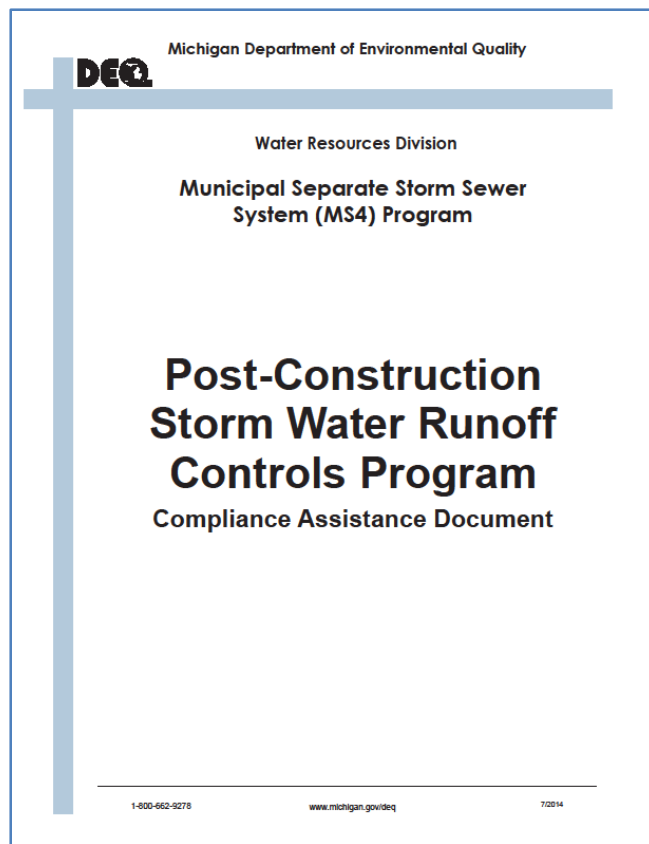
## Ordinance or Regulatory Mechanism Due

- October 1, 2017
- Option for compliance schedule to place ordinance into effect (cities and villages)



# Post-Construction Runoff

## Available Resources



# Post-Construction Runoff

## Ordinance or Regulatory Mechanism?

<b>Likely Scenarios for Applicability of Ordinance and Other Regulatory Mechanisms</b>				
<b>Permit Applicant Type</b>		<b>Ordinance</b>	<b>Other Regulatory Mechanism</b>	
			<b>Local Permit Program</b>	<b>Internal Written Policy</b>
City		◆		◆
Village		◆		◆
Township	With private discharges to its regulated MS4	◆		◆
	Without private discharges to its regulated MS4			◆
County Road Commission			Both	
County Drain Commissioner			Both	
County Administration			Both	
Public Institution				◆

# Post-Construction Runoff

## Format Options

- Reference other technical documents
- Submit a combination of ordinances and regulatory mechanisms



# Post-Construction Runoff

## Water Quality Treatment Performance Standard



- Treat the first 1" of runoff from the entire project site **and/or**
- Treat runoff generated from 90% of all runoff-producing storms for the project site



# Post-Construction Runoff

Treatment: BMPs **designed** to reduce total suspended solids loadings by 80% or achieve a discharge concentration not to exceed 80 mg/l



# Post-Construction Runoff

## Channel Protection Performance Standard

Post-construction runoff rate and volume of discharges not exceed the pre-development rate and volume for all storms up to the 2-year, 24-hour storm at the project site

Predevelopment: *Last land use prior to the planned new development or redevelopment*



# Post-Construction Runoff

<b>Example Linear Projects</b>		
<b>Project</b>	<b>Development or Redevelopment?</b>	<b>Disturbance Area</b>
New road (which may include new adjacent trails or sidewalks)	Development	Linear area of new road project (including any new adjacent trails or sidewalks)
New trail or sidewalk (without a change to an existing adjacent road)	Development	Linear area of new trail or sidewalk project
Re-pave; with re-construction to the subbase layer and a change in drainage	Redevelopment	Linear area of reconstruction plus any new additional impervious surface
Re-pave; overlay with no milling and no increase in impervious area or removal of surrounding vegetation or mill and overlay to the existing subbase layer with no change in drainage	Neither	Not applicable
Pave existing gravel shoulders; no additional center-road work	Redevelopment	Linear area of the shoulder paving (center-road excluded)
Convert raised center island in a boulevard to bioretention (no other changes to boulevard)	Neither. This would be considered a retrofit.	Not applicable

# Post-Construction Runoff

## Options:

- Green infrastructure toolbox
- Extended detention for tight soils
- Off-site and payment in lieu

Utilize: LGROW Green Calculator  
(to be designed)

- Rain Garden
- Bio-Swales
- Infiltration trenches
- Pervious Pavement
- Green Roof
- Landscaping
- Transpiration-Tree Selection
- Storage and reuse



*Washtenaw County Water Resources Commissioner*

## **Rules and Guidelines**

*Procedures & Design Criteria  
For Stormwater Management Systems*

*Issued - August 6, 2014*

# Post-Construction Runoff

**Off-Site Mitigation:** Developer implements BMPs at another location

**Payment in Lieu:** Developer pays a fee to the applicant that is applied to a public stormwater management project

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## Offsets

- 10 digit HUC
- Within urbanized area
- Offsets constructed within 24 months

# Post-Construction Runoff

## **Off-site mitigation and payment in lieu** to address:

- Redevelopment in ultra-urban areas
  - Contaminated sites
  - Tight soils
- Applicant establishes criteria for determining the availability of these options
  - Offset ratio required

# Post-Construction Runoff

Above and beyond the application requirements

- Regulate project sites <1 acre
- Direct discharges to surface water

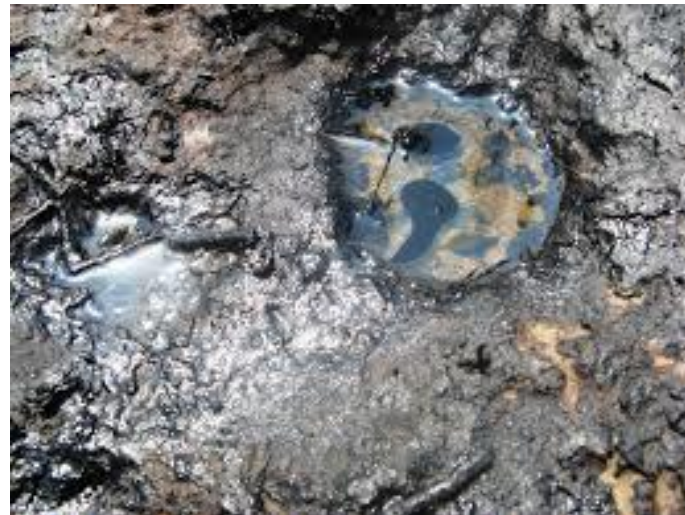
Requires tracking and maintaining in perpetuity



# Post-Construction Runoff

**Procedure** for reviewing the use of infiltration BMPs in areas of contaminated soil or groundwater (Part 201 and 213 sites)

Describe coordination with DEQ staff





# Post-Construction Runoff

Ordinance or regulatory mechanism requiring BMPs to address the associated pollutants in potential hot spots

- ✓ Commercial vehicle maintenance/repair
- ✓ Gas stations
- ✓ Auto recyclers
- ✓ Scrap yards
- ✓ Public water supply intakes



# Post-Construction Runoff

**Ordinance or regulatory mechanism** requirement to submit a site plan for review and approval of post-construction BMPs

**Procedure** for site plan review and approval

- Process for determining how the developer meets the performance standards and ensures long-term O&M

# Post-Construction Runoff

**Ordinance or regulatory requirement** requiring long-term O&M of all BMPs to meet the performance standards in perpetuity

**Ordinance or regulatory mechanism** requirement for a maintenance agreement



# Post-Construction Runoff

Maintenance agreement to allow the applicant to:

- ✓ Inspect structural and vegetative BMPs
- ✓ Perform the necessary maintenance
- ✓ Track the transfer of O&M responsibility



# Pollution Prevention/Good Housekeeping

Inventory of applicant owned/operated facilities and stormwater structural controls



**5 Detention Basins**



**200 Catch Basins**

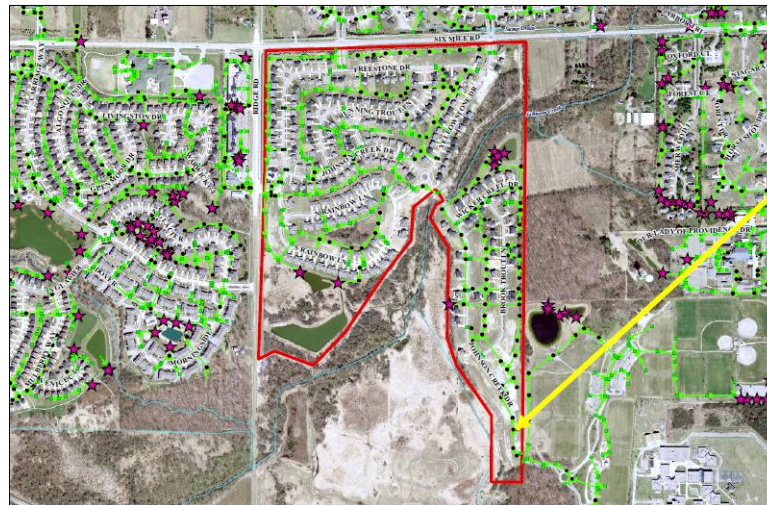


**5 Rain Gardens**

# Pollution Prevention/Good Housekeeping

Location of up-to-date map that identifies each facility and structural control

**Procedure** for updating and revising the inventory and map (*suggested timeframe = 30 days*)



# Pollution Prevention/Good Housekeeping

**Procedure** for assessing each facility for the potential to discharge to surface waters



Community Halls



DPW Yards



# Pollution Prevention/Good Housekeeping

List of prioritized facilities based on the assessment

- ✓ High, medium or low potential to discharge pollutants
- ✓ Fleet maintenance and storage yards have high potential





# Pollution Prevention/Good Housekeeping

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Fleet	A group of vehicles owned or operated as a unit
-------	---

Maintenance	Adding/changing vehicle fluids, fueling, painting, mechanical repairs, vehicle/equipment washing
-------------	--

Storage Yard	Areas where: Vehicles stored longer than overnight/weekend Road maintenance materials stored Vehicle maintenance materials stored Chemicals in bulk stored Catch basin cleaning wastes are stored Maintenance equipment stored
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# Pollution Prevention/Good Housekeeping

Site-specific SOP for each facility designated with a **high** potential to discharge

- ✓ Retain at the facility
- ✓ Identify person responsible
- ✓ List significant materials, handling/storage requirements, potential to discharge
- ✓ Identify good housekeeping practices
- ✓ Description/schedule for conducting routine maintenance and inspections
- ✓ Comprehensive site inspection at least once every 6 months

# Pollution Prevention/Good Housekeeping

**Procedure** identifying current or future BMPs to be implemented at *medium and low facilities*

- ✓ Proper salt storage (bagged salt)
- ✓ Garbage
- ✓ Minimal Chemical Storage

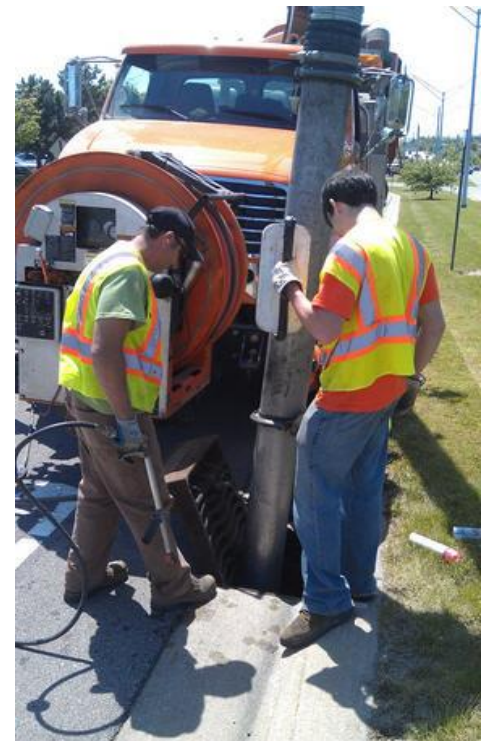


# Pollution Prevention/Good Housekeeping

**Procedure** for prioritizing catch basins for inspection, maintenance, and cleaning

- Process for updating/revising priority level based on inspection results and citizen complaints

Narrative description/map of catch basins in each priority level



# Pollution Prevention/Good Housekeeping

**Procedure** for inspecting, cleaning, and maintaining catch basins



**Procedure** for dewatering, storage and disposal of materials extracted from catch basins

- Combined solid and liquid waste stream from cleaning catch basins is a liquid industrial waste
- Consider referencing the [Catch Basin Cleaning Activities Guidance Document](#)

# Pollution Prevention/Good Housekeeping

## **Procedure** for inspecting and maintaining other stormwater structural controls

- ✓ Description and schedule for inspecting and maintaining
- ✓ Disposal process for maintenance waste materials
- ✓ Process for updating/revising the procedure

Refer to inventory in application requirement #60



# Pollution Prevention/Good Housekeeping

**NEW** water quantity facilities/structural controls will be designed and implemented in accordance with post-construction performance standards

- Your own flood storage projects
- Simple statement that these projects will meet the standards



# Pollution Prevention/Good Housekeeping

Assess applicant's O&M activities for the potential to discharge pollutants and the BMPs being implemented to prevent or reduce pollutant runoff

- ✓ Road, parking lot and sidewalk maintenance
- ✓ Bridge maintenance
- ✓ Right-of-way maintenance
- ✓ Unpaved road maintenance
- ✓ Cold weather operations
- ✓ Vehicle washing and maintenance





# Pollution Prevention/Good Housekeeping

## **Procedure** for prioritizing street sweeping activities

- Assign priority levels and associated cleaning schedule
- Process for updating/revising the priority level

Narrative description or map of streets, parking lots, and other impervious surfaces



# Pollution Prevention/Good Housekeeping

**Procedure** identifying sweeping methods used

**Procedure** for dewatering and disposal of street sweeper waste

- Consider referencing the [Catch Basin Cleaning Activities Guidance Document](#)



# Pollution Prevention/Good Housekeeping

Pesticide applicator to be certified by the State



Require contractors to comply with P2/GH program



- Consider including requirements in contract language (e.g., comply with the SWMP)
- Process for providing oversight of contractor activities

# Pollution Prevention/Good Housekeeping

Employee training program to train employees involved in P2/GH

- Staff trained once during the permit cycle and new hires within first year of hire date



# Total Maximum Daily Load (TMDL) Implementation Plan

*Making progress towards achieving the TMDL  
pollutant load reduction goal*

## **Procedure** for identifying and prioritizing BMPs

- Process for reviewing/updating/revising BMPs

## List of prioritized BMPs

- Include reference to targeted TMDL pollutant (e.g., sediment, E. coli, phosphorus)

# Total Maximum Daily Load (TMDL) Implementation Plan

*Making progress towards achieving TMDL  
pollutant load reduction goal*

Monitoring plan for assessing effectiveness of BMPs

- Schedule for completing monitoring
- Conducted at least two times during the permit cycle



# Final Submittal

Final application submittal may be lengthy if entire documents are submitted

## *Example*

Entire development standards document submitted with only portions referenced in application



# Individual Permit Process

- Application reviewed by District Staff
- When the SWMP appears to meet the minimum requirements, the individual permit is drafted
  - ✓ Draft permit sent to applicant for review
  - ✓ Proposed permit is public noticed for 30 days
- Decision is made on the permit
- Permit is in effect for 5 years, on average



# Individual Permit

- Permit requires implementation of the approved SWMP
- Opportunity to individualize permit language
- Part II Boilerplate Language
- Progress reports due 2 times during permit term
- Opportunity to modify SWMP
- View other SWMPs available in MiWaters

# Application Assistance

- **Contact District Staff**
  - **Schedule a one-on-one meeting**
  - **Start early**
- 

A scenic view of a waterfront promenade. In the foreground, a wooden deck runs along the water's edge, bordered by a green metal railing with a dark blue handrail. A black lamp post with a white globe stands on the deck. In the background, a large brick building with many windows is visible, connected to the promenade by a long, white, elevated walkway. The water is calm and reflects the sky. The sky is clear and blue.

Contact Us

MS4 District Staff –

Click [HERE](#)