### **VILLAGE OF BEVERLY HILLS**

### **DEPARTMENT OF PUBLIC SERVICES**

# STORM WATER POLLUTION PREVENTION PLAN (SWPPP) POLLUTION INCIDENT PREVENTION PLAN (PIPP)



**MARCH 2016** 

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## STORM WATER POLLUTION PREVENTION PLAN/POLLUTION INCIDENT PREVENTION PLAN (SWPPP/PIPP)

The Storm Water Pollution Prevention/Pollution Incident Prevention Plan provides a response plan as required by the State of Michigan's Part 5 Rules. This plan provides spill response procedures and is intended to provide guidance in the event of a release of polluting materials to air, soil, or surface water at the Village of Beverly Hills Department of Public Services (DPS) Facility. The provisions of this plan must be carried out immediately in the event of a release of polluting materials that could threaten human health or the environment. The Part 5 Rules require facilities that receive, process, manufacture, store, or ship polluting materials above the threshold amounts to develop and implement a PIP Plan and to provide containment for potentially polluting materials. Michigan Part 5 Rules defines "polluting material" as oil, salt, and any material listed on the Polluting Materials list.

Updated Material Safety Data Sheets (MSDSs) are continually tracked and filed and made readily available for review by employees at the facility. These are located inside the DPS Garage.

#### 1.1 EMERGENCY CONTACTS

POLICE DEPARTMENT/DIPSATCH: 911

Michigan Department of Environmental Quality (MDEQ) – Southeast Michigan District Office	27700 Donald Court Warren, MI 48092-2793 Phone: 586.753.3775 Fax: 586.751.4690
MDEQ 24-Hour Pollution Emergency Alert System (PEAS)	800.292.4706
OCWRC 24-Hour Pollution Prevention Hotline	248.858.0931
Oakland County Local Emergency Planning Committee	1200 N. Telegraph Road Building 47W Pontiac, MI 48341-0410 248.858.5300
Detroit Water and Sewerage Department (DWSD)	313.267.8000 313.267.7401 (emergency)
State Emergency Response Commission	517.373.8481 517.335.4650
National Emergency Response Center	800.424.8802
U.S. EPA Region 5 Office 24-Hour Number	312.353.2318
CHEMTREC (chemicals, spills, fires information)	800.262.8200

**Statement of Compliance:** This facility is currently in compliance with the Part 5 PIPP Rules.

### 1.2 SWPPP/PIPP Distribution

The Department of Public Services Director maintains a copy of this Plan. The Plan is available to all personnel who are authorized to have access to it.

A letter certifying that the facility is in compliance with the Part 5 Rules will be sent to the MDEQ – Water Resources Division within 30 days of finalizing the completion or updates to this Plan.

Copies of this Plan and future revised Plans will be available upon request to the list below:

- 1. US EPA Regional Administrator
- 2. MDEQ Water Resources Division, SE Michigan District
- 3. Village of Beverly Hills Police Department
- 4. Emergency Response Contractor
- 5. Oakland County Local Emergency Planning Committee (LEPC)
- 6. Oakland County Health Department
- 7. State of Michigan Emergency Response Commission-MDEQ Waste Management Div.

### 1.3 PIPP Amendments

This Plan will be reviewed and updated annually, or when facility personnel, processes, or procedures identified in the Plan change or as otherwise necessary to maintain compliance with the Part 5 Rules. Upon completion of the updated Plan, the owner shall recertify the Plan and notify MDEQ, the local LEPC, and the local Health Department (with a letter) of compliance with the Part 5 Rules.

### 1.3 Facility Description

The DPS administrative offices and DPS complex are located at: 18500 W. 13 Mile Road, Beverly Hills.

The DPS Facility has 5 full-time employees. Mowing, fertilizing, catch basin cleaning, and street sweeping services are contracted out.

The DPS site includes a 5,000 sq. ft. building with three overhead doors facing east, with a separate shed on the west side for salt storage. The main building is metal, with a mildly sloped roof, approximately 20 feet high at its peak. The main building was constructed in 1952. The salt storage shed was built in 1952.

The site is paved with asphalt. Erosion potential is very low, as the area is relatively flat. Surface runoff flows either onto the adjacent grassed area or onto the gravel/dirt drive. One (1) storm water catch basin is located on the west side of the property, approximately 50 feet from the DPS garage and 30 feet from the salt storage shed. A sanitary sewer drain is located on the west side near the salt shed.

Approximately 300 tons of salt are stored at any given time and 800 tons are applied annually.

Receiving Waters: Rouge River

### 1.3.1 Operations

The DPS Facility is utilized for the storage of salt, sand, gravel, mulch, compost, and asphalt cold patch. Most materials are well contained on site.

Minor vehicle maintenance is carried out at the DPS site. However, most repairs are performed by a commercial maintenance shop (which includes: lubrication, oil changes, tire changes, etc.).

Vehicles and equipment are washed outside the garage, near the catch basin that is connected to the sanitary sewer.

The yard provides the storage space for the various road maintenance equipment, materials and miscellaneous equipment.

A DPS Facility Site Map is included in Appendix A.

### 1.4 Significant Materials

### 1.4.1 Definition

Significant Materials are any material which could degrade or impair water quality including but not limited to:

- A. Raw materials
- B. Fuels
- C. Solvents
- D. Detergents
- E. Finished materials (metallic products)
- F. Hazardous substances designated under Section 101(14) of CERCLA Act
- G. Polluting materials oil and any material, in solid or liquid form, identified as polluting under the Part 5 Rules
- H. Hazardous wastes as defined in Part 111 of the Michigan Act
- I. Fertilizers
- J. Pesticides
- K. Waste products (ashes, slag, sludge, plant waste, animal waste)

Both the inside and outside of the facility is inventoried to determine the materials and practices that may be sources of contamination to stormwater runoff. See Table 1.3 for a list of significant materials located at the DPS facility.

### 1.4.2 Description of Industrial Activities & Significant Materials Storage Area

The permit requires industrial facilities to evaluate the reasonable potential for contribution of significant materials to storm water runoff from at least the following areas or activities:

- A. Loading, unloading, and other material handling operations
- B. Outdoor storage including secondary containment structures
- C. Outdoor manufacturing or processing activities
- D. Significant dust or particulate generating processes
- E. On-site waste disposal practices
- F. Maintenance and cleaning of vehicles, machines, and equipment
- G. Areas of exposed and/or erodible soils
- H. Sites of Environmental Contamination listed under Part 201 (Environmental Response) of the Michigan Act
- I. Areas of significant material residues

- J. Areas where animals congregate (wild or domestic) and deposit wastes
- K. Other areas where stormwater may contact significant materials

For each applicable item, the permit requires a written description of the specific activity or storage area. Along with the written description of the activities or storage areas, a description of the significant materials associated with those items must be included.

### 1.5 Past Pollution Incidents/Significant Spills

There has not been a reportable oil spill or chemical release incident in the past 3 years.

**Table 1.1 Significant Spills Incidents** 

Date	Location	Description of Incident

### 1.6 TMDL Requirements

The permit requires that if there is a Total Maximum Daily Load (TMDL) established by the Department for the receiving water, which restricts the discharge of any of the identified significant materials or constituents of those materials, then the SWPPP/PIPP shall identify the level of control for those materials necessary to comply with the TMDL, and an estimate of the current annual load of those materials via storm water discharges to the receiving stream.

The TMDL means the amount of pollutant load a water body, such as a lake or stream, can assimilate and still meet water quality standards. If a receiving water body does not meet the water quality standards for a specific pollutant, the MDEQ will establish the appropriate daily maximum load for that pollutant to allow the water body to again meet water quality standards. If a permitted facility is expected to discharge that specific pollutant in its storm water to that water body, the General Permit requires the facility to list actions it will take to meet that TMDL requirement. For example, if the TMDL calls for storm water dischargers to reduce their phosphorus inputs by 50%, the permittee would need to identify phosphorus sources at their facility and estimate their current annual load. The permittee must list actions to reduce storm water phosphorus discharges from their facility by 50%.

Table 1.2 Applicable TMDL Pollutants

TMDL Pollutant	Numeric Target	BMP Practices
E. coli	Target concentration is 130 mg/L MGM or 300 mg/L DGM.	The pavement is swept regularly which removes sediment and possible feces from wild animals. The onsite sanitary sewer is checked periodically for issues.
Sediment	Primary: Reestablishment of fish and macroinvertebrate communities. Secondary: 80 mg/L SS for wet weather.	The pavement is swept regularly which removes sediment. Onsite catch basins are cleaned regularly.

### 1.7 Emergency Response Personnel

### 1.7.1 Emergency Response Coordinator Responsibilities

The Emergency Response Coordinator (ERC) has a wide range of responsibilities including employee training, conducting facilities inspections, and committing Village resources to respond to emergency situations. The ERC must be thoroughly familiar with facility operations and the Plan contents and must be either at the facility or on call and be able to respond to an emergency in a short period of time. Specific ERC responsibilities are outline below. The ERC may delegate these responsibilities to an alternate ERC at his/her discretion.

- A. Ensuring that emergency response equipment inspections are conducted quarterly.
- B. Activating internal facility alarms or communication systems to notify all facility personnel of an emergency situation.
- C. Assessing the nature and extent of emergency situations and committing the resources necessary for proper response.
- D. Ensuring that injured personnel are given appropriate medical attention and/or arranging transportation to a hospital when necessary.
- E. Maintaining adequate space for the movement of emergency response personnel and equipment.
- F. Ensuring that waste materials generated from emergency response activities are handled, stored, and disposed of in accordance with state and federal regulations.
- G. Notifying the appropriate local, state, and federal agencies of releases and emergencies.
- H. Minimizing the likelihood of an emergency situation recurring by evaluating incidents, critiquing response, and implementing improved procedures as necessary.

### 1.7.2 Emergency Response Coordinator

Primary Coordinator: **Tom Meszler** 

Title: Director of Public Services

Responsibility: Signing required certifications, Program implementation, Employee Training,

Monthly Inspections

Telephone: (248) 646-6404

Email: tmeszler@villagebeverlyhills.com

Alternate Coordinator: Hubbell, Roth & Clark, Inc., Environmental Engineering Department

Responsibility: Bi-Annual PIPP Inspections

Telephone: (248) 454-6300

### 1.7.3 Spill Contractor

In case of a spill that requires a clean-up contractor, the Village contacts the Fire Department for assistance.

### 1.8 Emergency Response Equipment

### 1.8.1 Spill Control and Personal Protection Equipment

Village staff are trained to clean up small spills or releases in their work areas. In the event of an emergency, a spill contractor is on call to respond to spills and releases at the facility. Table 1.1 lists the available emergency response equipment. The equipment is stored near areas of concern and is immediately available.

**Table 1.3 Spill Control and Personal Protection Equipment** 

Equipment	Location	Intended Use
Shovels/brooms	Located in DPS Facility	Used to clean up spill absorbents and solid pollutants
First Aid Kits	Located in DPS Facility	Available for use and treatment of minor medical emergencies
Fire extinguishers	Located in DPS Facility – Various Locations	Available to assist in fire control
Spill kits/absorbents	Located in DPS Facility	Contain and clean up minor spills

### 1.9 Spill Prevention and Control

Material storage, spill training, and preventative maintenance practices will be the primary methods used at the DPS Facility to minimize the potential for spills of salt, oil, and other polluting materials.

Significant spills occurring at the facility property will be recorded on the *DEQ Spill or Release Report* form located in Appendix B. Section 1.4 of this Plan will be updated if a significant spill or leak occurs. In addition, the spill prevention and response procedures will be evaluated to determine if the planned response was adequate. If necessary, the spill prevention and response procedures will be modified to include additional or alternative practices to minimize future spills.

The following items outline some of the general spill prevention procedures and practices implemented at the DPS Facility:

### 1.9.1 Good Housekeeping

RETAP performed a facilities assessment in 2007. In addition, Hubbell, Roth & Clark, Inc. (HRC), the Village's Engineering Consultant, performed an Environmental Assessment at the DPS Facility in August 2013.

Most repairs are handled by a commercial repair/maintenance station. Specifically;

- Detailed maintenance logs are kept on all vehicles.
- Spare parts and some chemicals are located on shelving units.
- Solvents, cleaners, and miscellaneous chemicals are stored in designated cabinet or on the floor of the DPS Garage.
- Motor oil, power steering fluid, and other automotive fluids are stored in fifty-five (55) gallon drums along the wall. No secondary containment exists for spill control.
- Used antifreeze is placed in five (5) gallon pails and stored along the wall.

- Recyclable parts, materials, and fluids are recycled through a third party vendor.
- DPS Staff visually inspects all vehicles and equipment for leaks and maintenance issues at least monthly, and/or on rainy days when more time allows.
- Drip pans, containers, and 'quick-dry' agents are readily available for known leaks and repairs.
- Two (2) sanitary manholes, located inside the DPS Garage drain directly to the sanitary sewer system. The drains are cleaned out as needed.
- Most chemicals and miscellaneous fluids are located and stored on shelving units in the DPS Garage. Aerosol sprays and other hazardous materials are stored in a cabinet along the wall.
- The Village utilizes a pre-wetting agent during the winter season.

### 1.9.2 Preventative Maintenance and Good Housekeeping Program (Routine Inspections)

The permit requires a description of a program for routine preventive maintenance and good housekeeping procedures to maintain a clean, orderly facility. The Preventative Maintenance and Good Housekeeping procedures include inspection and maintenance of storm water management and control devices monthly (e.g. cleaning of oil/water separators and catch basins) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. These procedures are intended to reduce the potential for significant materials to come in contact with storm water. A log of the inspection and corrective actions shall be maintained on file and shall be retained for three years. The Preventative Maintenance and Good Housekeeping Inspection Form is in Appendix C.

### HOUSEKEEPING PROCEDURE DESCRIPTION:

DPS Facility- Street sweeping the facility parking lot and driveway areas regularly. Catch basin sumps are cleaned annually to remove sediment. Staff visually inspects all vehicles and equipment daily for leaks and maintenance issues. DPS staff visually inspects the garbage dumpsters frequently. Old and leaky dumpsters are replaced as needed.

Inside each facility, staff perform sweeping of work areas on a daily basis. Spills are immediately addressed and chemicals are properly stored with secondary containment where necessary.

### 1.9.3 Comprehensive Site Inspections

The permit requires a schedule for comprehensive site inspection to include but not be limited to, the areas and equipment identified in the preventive maintenance program and good housekeeping procedures. The inspection shall also include a review of the routine preventive maintenance reports, good housekeeping inspections reports, and any other paperwork associated with the SWPPP/PIPP. The comprehensive site inspection shall be conducted by the Certified Storm Water Operator biannually. The permittee may request Department approval of an alternate schedule for comprehensive site inspections. A report of the comprehensive site inspection results shall be prepared and retained for three years. The report shall identify any incidents of non-compliance with the SWPPP/PIPP or this permit. If there are no reportable incidents of non-compliance, the report shall contain a certification that the facility is in compliance with this permit. The Comprehensive Site Inspection Form is in Appendix D.

### COMPREHESIVE SITE INSPECTION SCHEDULE:

DPS Facility- Site inspections are scheduled for spring (March-May) and fall (September-November) of each year. A log shall be maintained and records will be kept for a minimum of three years. Annual inspections and SWPPP/PIPP review will be performed September-November of each year.

### 1.9.4 Employee Training Program

Various DPS staff (primarily the Director) has attended training opportunities provided by SEMCOG and other entities. The Phase II General MS4 Permit requires <u>all</u> DPS staff to attend periodic pollution prevention and good housekeeping training as it is provided. The Village and its storm water consultant work together to ensure that future training opportunities are participated by staff.

### 1.9.5 Best Management Practices

Street sweeping wastes are stockpiled at the DPS facility, and then taken to a proper landfill for disposal.

Currently, no fertilizers or pesticides are utilized on any of the Village-owned properties. The Village has a contract with Comeau for mowing operations.

### 1.10 Non-Stormwater Discharges

The permit requires that all discharge locations be evaluated for the presence of non-storm water discharges. Any unauthorized storm water discharges must be eliminated, or covered under another NPDES permit.

Storm water shall be defined to include all of the following non-storm water discharges provided pollution prevention controls for the non-storm water component are identified in the SWPPP:

- A. Discharges from fire hydrant flushing
- B. Potable water sources including water line flushing
- C. Fire system test water
- D. Irrigation drainage
- E. Lawn watering
- F. Routine building wash down which does not use detergents or other compounds
- G. Pavement wash waters where contamination by toxic or hazardous materials have not occurred (unless all contamination by toxic or hazardous materials have been removed) and where detergents are not used
- H. Air conditioning condensate
- I. Springs
- J. Uncontaminated ground water
- K. Foundations or footing drains where flows are not contaminated with process materials such as solvents

Discharges from firefighting activities are authorized by the permit, but are exempted from the requirement to be identified in the SWPPP.

The table below specifies what non-storm water discharges occur at the facility.

### **Table 1.4 Non-Stormwater Discharges**

### Description #1

### Non-storm water discharge:

Hosing down vehicles/equipment outdoors

### **Pollution Prevention Controls:**

Drain wastewater to sanitary sewer system

### Outfall that receives the discharge:

N/A

### 1.11 Structural Controls

The permit requires that where implementation of non-structural controls does not control storm water discharges in accordance with water quality standards, the SWPPP shall provide a description of the location, function, and design criteria of structural controls for prevention and treatment.

Structural controls may be necessary:

- 1) To prevent uncontaminated storm water from contacting or being contacted by significant materials; or
- 2) If preventive measures are not feasible or are inadequate to keep significant materials at the site from contaminating storm water. Structural controls shall be used to treat, divert, isolate, recycle, reuse, or otherwise manage storm water in a manner that reduces the level of significant materials in the storm water and provides compliance with the Water Quality Standards

### Examples of structural controls:

- A. Signs and Labels
- B. Safety Posts
- C. Fences
- D. Security Systems
- E. Temporary and Permanent Coverings
- F. Storm Water Conveyances
- G. Diversion Dikes
- H. Grading
- Paving
- J. Curbing
- K. Drip Pans
- L. Secondary Containment
- M. Catch Basin Inserts
- N. Detention and Retention Ponds
- O. Vegetative Filters
- P. Sand Filters
- Q. Oil/Water Separators

Below is a description of structural controls used at the facility.

**Table 1.5 Structural Controls** 

Structural Control	Location
Drip pans	Inside DPS Garage
Temporary cover for salt storage	Outside DPS Garage
Catch basin inserts	Outside DPS

### 1.12 Emergency Management Activities

### 1.12.1 Initial Response Procedures

In the event of a spill or the failure of a storage unit, the following steps should be immediately implemented:

- A. Ensure the safety of employees in the area. If an employee is injured, immediately contact the Primary Emergency Response Coordinator or supervisor for further instructions.
- B. If no danger to an employee exists, attempt to stop the spill or leak at its source.
- C. If possible, identify the spilled material. It is important to identify the spilled material so that the MSDS can be used to identify health hazards, environmental warnings, and material compatibility.
- D. **Notify the Primary Emergency Coordinator** as soon as possible. The Primary Emergency Response Coordinator will contact additional Emergency Response Coordinators whenever necessary.
- E. Contain the material in the smallest possible area by using the emergency response equipment provided in this plan. If the spill is small, use a broom or shovel to clean up the spill. Dispose of materials appropriately. Prevent spills from entering the combined sewer system.
- F. **Begin the Notification Procedure.** The Emergency Response Coordinator has authority to determine if outside contractors are needed to help clean a spill and will coordinate with management if agency reporting is required. If the Reportable Quantity of a particular material is released, agency notification must begin as soon as practicable (within 30 minutes of discovery of the incident).
- G. **Recover or cleanup the spilled material.** Remove the spilled material through the use of a shovel or front end loader. As much material as possible should be recovered and reused where appropriate.
- H. After the spill has been cleaned, the Emergency Response Coordinator will complete a report summarizing the details of the incident. This report shall be retained in Appendix B of this Plan.
- I. Evaluate the PIP Plan and amend if necessary. Determine the cause of the incident and evaluate the emergency response procedures. Correct any deficiencies and amend the plan accordingly.

### 1.12.2 Emergency Notifications

This subsection is intended to help the Emergency Response Coordinator to determine whether a spill needs to be reported and to whom the reports must be made. NOTE: Prior to notifying state or federal authorities, the Emergency Response Coordinator must try to make contact with management.

**PIPP (Michigan Part 5 Rules) Emergency Notifications** – These Rules require immediate notification be made to PEAS, the SERC, 911, and the LEPC if oil, salt, or a Polluting Material (see attachment) has reached or has the potential to reach surface or ground waters of the State. This includes indirect discharges through storm or sanitary sewer systems. Note that the discharge of limited concentrations of oil, salt, or Polluting Materials to the waters of the State or to a sanitary sewer may be allowed if the MDEQ or local ordinance has approved the discharge and issued a permit.

If the Emergency Response Coordinator determines that a Polluting material has reached or has the potential to reach surface or groundwaters of the State, verbal notice shall be given as soon as practicable after detection of the release to the MDEQ 24-Hour Pollution Emergency Alert System (PEAS) at (800) 292.4706 and to 911.

Within ten (10) days of the incident, the Emergency Response Coordinator must file a written report with the **MDEQ Southeast Michigan District Office** (586.753.3775) and the Oakland County Health Department. The written report shall outline the cause of the incident, its discovery, and any procedures taken to remove the oil, salt, or Polluting Material(s) from the waters of the State.

### **Additional External Emergency Notifications:**

**Fire Department, Police Department, Ambulance Services** – If a spill incident results in injuries to Village staff, emergency medical services will be contacted immediately. If a spill is the result of vandalism or if police assistance is needed, the Police Department will be contacted. If the spill results in a fire, explosion, or threat thereof, the Fire Department will be immediately notified. The Emergency Response Coordinator shall determine if the outside contractor is needed to help clean up a spill. If the facility has knowledge of any release of a hazardous substance in a quantity equal to or exceeding the reportable Quantity, the National Response Center, the SERC, and the LEPC shall be notified immediately.

Oakland County Local Emergency Planning Committee 248.858.5371

• State Emergency Response Commission 517.373.8481 or 9807

National Response Center (NRC) 800.424.8802

### **Internal Notifications:**

The following Village personnel shall be contacted in the event of a spill incident that requires state or federal agency notification or cleanup assistance from an outside contractor. This contact should normally be made after a spill incident has occurred and the appropriate response has taken place, but before outside agencies are notified. Note that requirements to contact outside agencies are time critical. The agency calls must be made quickly even if management cannot be reached.

Tom Meszler 248.646.6404

### 1.13 Employee Training Program

The following is a description of the employee training programs to be implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the SWPPP.

### 1.13.1 Employee Training Description & Frequency.

Good Housekeeping and Pollution Prevention training is provided by SEMCOG, Hubbell, Roth & Clark, Inc. and other entities. All DPS personnel attend training a minimum of once every five (5) years and within the first year of employment.

**Table 1.6 Significant Materials** 

Material	Location	Container Material	Inside/ Outside	Safety Devices	Secondary Containment	Storage Capacity	Secondary Containmen t Volume
Rock Salt	Salt Shed	Metal	Outside	N/A	Contained inside a building; no doors	300 tons	N/A
Mulch/Dirt Piles	West Side of Property	Asphalt	Outside	N/A	Contained on asphalt lot near storm drain	20 tons each	N/A
Cold Patch	North Side of Property	None	Outside	N/A	Contained on asphalt lot near storm drain	N/A	N/A
Gravel Pile	North Side of Property	None	Outside	N/A	Contained on asphalt lot near storm drain	N/A	N/A
Solid Waste Dumpsters (2)	South Side of Property	Metal	Outside	Lids	N/A	N/A	N/A
Hydraulic, Oil, Misc. Drums	Inside DPS Garage	Metal & Plastic Drums	Inside	Locked DPS Garage	On shelves; On Floor	55-gallon	N/A – Looking into
Waste Fuel & Oil Drums	Inside DPS Garage	Metal & Plastic Drums	Inside	Locked DPS Garage	On Floor	55-gallon	N/A – Looking into
Hazardous/Flammable Materials	Inside DPS Garage	Labeled Cabinet	Inside	Locked DPS Garage	Labeled Cabinet	N/A	N/A
Washing of Vehicles & Equipment	Outside GPS Garage	N/A	Outside	N/A	N/A	N/A	N/A

### APPENDIX A - DEPARTMENT OF PUBLIC SERVICES FACILITY MAP



### APPENDIX B – MDEQ SPILL OR RELEASE REPORT



#### MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

### SPILL OR RELEASE REPORT

NOTE: Some regulations require a specific form to use and procedures to follow when reporting a release. Those forms and procedures MUST be used and followed if reporting under those regulations. This report form is to aid persons reporting releases under regulations that do not require a specific form. This report form is not required to be used. To report a release, some regulations require a facility to call the PEAS Hotline at 800-292-4706, or DEQ District Office that oversees the county where it occurred, and other regulating agencies and provide the following information. A follow-up written report may be required. Keep a copy of this report as documentation that the release was reported. If you prefer to submit this report electronically by FAX or e-mail, contact the regulating agency for the correct telephone number or e-mail address. See the DEQ website on Spill/Release Reporting for more reporting information.

Please print or type all information. NAME AND TITLE OF PERSON SUBMITTING WRITTEN REPORT TELEPHONE NUMBER (provide area code) NAME OF BUSINESS RELEASE LOCATION (provide address if different than business, if known, and give directions to the spill location. Include nearest highway, town, road intersection, etc.) STREET ADDRESS CITY ZIP CODE BUSINESS TELEPHONE NUMBER (provide area code) SITE IDENTIFICATION NUMBER AND OTHER IDENTIFYING NUMBERS (if applicable) TOWNSHIP TIER/RANGE/SECTION RELEASE DATA. Complete all applicable categories. Check all the boxes that apply to the release. Provide the best available information regarding the release and its impacts. Attach additional pages if necessary. DATE & TIME OF DATE & TIME OF DURATION OF RELEASE (if known) TYPE OF INCIDENT ☐ Pipe/valve leak or rupture ☐ Vehicle accident RELEASE (if known) DISCOVERY ☐ Explosion days Fire hours Leaking container ☐ Other minutes Loading/unloading release am/pm am/pm CAS NUMBER or HAZARDOUS WASTE CODE MATERIAL RELEASED (Chemical or trade name) ESTIMATED QUANTITY PHYSICAL STATE CHECK HERE IF ADDITIONAL MATERIALS LISTED ON ATTACHED PAGE. RELEASED (indicate unit RELEASED e.g. lbs, gals, cu ft or yds) (indicate if solid. liquid, or gas) FACTORS CONTRIBUTING TO RELEASE SOURCE OF LOSS ☐ Training deficiencies
☐ Unusual weather Equipment failure □ Container □ Ship □ Truck Operator error Unusual weather conditions ☐ Railroad car □ Tank □ Other Other ☐ Faulty process design ☐ Pipeline ☐ Tanker TYPE OF MATERIAL RELEASED MATERIAL LISTED ON or DEFINED BY IMMEDIATE ACTIONS TAKEN ☐ Containment ☐ Dilution Agricultural: manure, pesticide, ☐ CAA Section 112(r) list (40 CFR Part 68) Diversion of release to fertilizer ☐ CERCLA Table 302.4 (40 CFR Part 302) treatment Chemicals Evacuation
Hazard removal ☐ EPCRA Extremely Hazardous Substance ☐ Decontamination of ☐ Flammable or combustible liquid (40 CFR Part 355) persons or equipment Michigan Critical Materials Register or permit Hazardous waste Neutralization Monitoring NREPA Part 31, Part 5 Rules polluting material Liquid industrial waste ☐ System shut down ☐ Other NREPA Part 111 or RCRA hazardous waste Oil/petroleum products or waste ☐ Salt NREPA Part 121 liquid industrial waste Sewage Other list ☐ Other Unknown Unknown RELEASE REACHED Distance from spill location to ☐ Surface waters (include name of river, lake, drain involved) surface water, in feet ☐ Drain connected to sanitary sewer (include name of wastewater treatment plant and/or street drain, if known) ☐ Drain connected to storm sewer (include name of drain or water body it discharges into, if known) Groundwater (indicate if it is a known or suspected drinking water source and include name of aquifer, if known) Soils (include type e.g. clay, sand, loam, etc.) Ambient Air Spill contained on impervious surface

EXTENT OF INJURIES, IF ANY		WAS ANYONE HOSPITALIZED?	INJURIES TREATED	
	HOSPITALIZED:	ON-SITE:		
		□ No		
DESCRIBE THE INCIDENT, THE TYPE OF EQUIPMENT INVOLVED IN THE RELEASE, HOW THE VOLUME OF LOSS WAS DETERMINED, ALONG WITH ANY RESULTING ENVIRONMENTAL DAMAGE CAUSED BY THE RELEASE. IDENTIFY WHO IMMEDIATELY RESPONDED TO THE INCIDENT (own employees or contractor — include cleanup company name, contact person, and telephone number). ALSO IDENTIFY WHO DID FURTHER CLEANUP ACTIVITIES, IF PERFORMED OR KNOWN WHEN REPORT SUBMITTED CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCLUDED ON ATTACHED PAGE				
· ·				
ESTIMATED QUANTITY OF ANY RECOVERED MATERIALS AND A DESCRI	PTION OF HOW THOSE MATERIALS WERE MANAGI LUDED ON ATTACHED PAGE	ED (include disposal method if ap	plicable)	
ASSESSMENT OF ACTUAL OR POTENTIAL HAZARDS TO HUMAN HEALTH	t finaluda kasuur asuta ay lamadiata and akusula sa	deleved effects and when a second		
regarding medical attention necessary for exposed individuals.)  CHECK HERE IF DESCRIPTION OR ADDITIONAL COMMENTS ARE INCI		delayed effects, and where appro	priate, advice	
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFIED:  INITIAL CONTACT BY: ☐ Telephone ☐ Fax ☐ Email ☐ Oth	OTHER ENTITIES NOTIFIED:		7	
DATE/TIME INITIAL CONTACT:	□ National Response Center (N		Date: Time:	
DATE HILL WITHE CONTACT.	US Coast Guard Office:			
PEAS: 800-292-4706 Log Number Assigned	Detroit ☐ Grand Haven ☐ S	Sault Ste. Marie		
DEQ District or Field Office Divisions or Offices Contain		-		
☐ Baraga ☐ Gwinn ☐ Air Quality ☐ Bay City ☐ Jackson ☐ Land & Water Manager	US Environmental Protection			
☐ Bay City ☐ Jackson ☐ Land & Water Manager ☐ Cadillac ☐ Kalamazoo ☐ Office Geological Surve	, , , , , , , , , , , , , , , , , ,	answering point)		
☐ Crystal Falls ☐ Lansing ☐ Remediation and	Local Police and/or State Po	lice -		
☐ Detroit ☐ Newberry Redevelopment	☐ Local Emergency Planning C	-		
☐ Gaylord ☐ Warren ☐ Waste and Hazardous	☐ State Emergency Response	Commission		
☐ Grand Rapids ☐ Wyoming Materials	via MI SARA Title III Program			
DEQ Office locations are subject to change Water Bureau	☐ Wastewater Treatment Plant ☐ Hazmat Team	Authority _		
	☐ Local Health Department	-		
NAME AND TITLE OF PERSON MAKING INITIAL REPORT:	☐ Department of Labor & Econ	omic Growth MIOSHA		
	☐ Department of Labor & Econ	omic Growth Fire Safety		
,				
DEQ STAFF CONTACTED & PHONE NUMBER:	PERSON CONTACTED & PHO			
	_			
DATE WRITTEN REPORT SUBMITTED SIGNATURE OF PERSON	ON SUBMITTING WRITTEN REPORT			

# APPENDIX C – PREVENTATIVE MAINTENANCE AND GOOD HOUSEKEEPING (MONTHLY) INSPECTION FORM

Date:	Time:
Inspector	
Inspector Print:	Signature:

Areas Inspected	Method	Comments/Corrective Actions
Facility Floor	Verify that the facility floor is clean of debris, sediment and chemicals/oil.	
Facility Floor Drains	Inspect structures for signs of debris/sediment accumulation.	
Container Labeling	All containers that hold chemicals or oil must be properly labeled.	
Spill Kits	Spill kits must be accessible and properly labeled.	
Chemicals Storage	Chemicals are properly stored off the floor on shelves or in cabinets and all contained are sealed when not in use.	
Parking Lot	Verify that parking lot is clean of debris and sediment.	
Catch Basins	Inspect structures for signs of an illicit discharge or debris/sediment accumulation.	
Dumpster	Dumpster area is clean, lids are closed, and no rusting areas or holes are present.	
Salt Dome	Examine salt dome for roof leaks and salt tracking outside of dome area. Verify broom is present for sweeping.	
Stockpiles Storage	Examine storage pile area for erosion outside of containment area.	
Scrap Metal	Scrap metal storage is indoors or properly covered.	
Compost Area	Examine storage pile area for erosion outside of containment area.	

## APPENDIX D – PREVENTATIVE MAINTENANCE AND GOOD HOUSEKEEPING (MONTHLY) INSPECTION FORM

Date:	Time:
Inspector	
Inspector Print:	Signature:

Are the Facilities in compliance with the General Permit and the SWPPP:

Areas Inspected	Method	Comments/Corrective Actions
Preventative Maintenance and Good Housekeeping Inspections	Conduct inspection as part of Comprehensive Inspection Process and review that inspections have been filed.	
Vehicle and Equipment Maintenance Logs	Review that logs are being completed and filed.	
Spill Reports	Reports of any spills have been completed and filed.	
Spill Response Plan	Review plan for any needed updates	
Spill Response Phone Numbers	Verify that phone numbers are accessible and current.	
Employee Training	Personnel Training records are current.	

### APPENDIX E - SWPPP/PIPP REVIEW FORM (ANNUALLY)

Facility Information					_
Designated Name:	Certificate of Coverage No.:				
Facility Contact Information	T = 1				
Name:	Telephone No.:				
Email Address:	Certification No:				
Backup Facility Contact Information  Name:	Tolophono No.				
Name.	Telephone No.:				
Email Address:	Certification No:				
Certified Operator Information					
Name:	Telephone No.:				
Email Address:		Certific	cation No:		
SWPPP Rev	iew Checklist				
1) Facility general information is current and acc	curate		Yes	No	
2) Site map is current and accurate			Yes	No	
3) Significant material inventory is current and a	ccurate		Yes	No	
4) New exposures, processes and related contr	ols have been		Yes	No	NA
documented appropriately in the PIPP				NI-	NIA.
5) Spills have been recorded and reported as a		otod	Yes Yes	No No	NA
<ul><li>6) Employee SWPPP/PIPP training was conducted</li><li>7) Records of routine preventative maintenance</li></ul>			Yes	No	
inspections are available in the PIPP file	and nousekeepi	ı ıg	103	140	
8) Comprehensive site inspections have been completed, certified and			Yes	No	
filed in the PIPP file					
9) Corrective actions noted in the inspection reports have been			Yes	No	
completed 10) PIPP has been reviewed and signed by the Employee Response			Yes	No	
Coordinator			100	10	
Additional Comments (use additional sheets if necessary):					
I certify that the above information is correct					
Name: Signature / Date:					

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

### **GENERAL PROCEDURES**

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 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 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

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

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

Based on these criteria, the potential for each facility to discharge pollutants to the waters of the state were rated high, medium, or low. For "low" priority facilities where no assessment factors are present, catch basin cleaning and street sweeping will be performed as indicated in the applicable procedures for these activities. For "medium" priority facilities, appropriate BMPs are considered based on the assessment factors present to prevent or minimize the potential for pollutants from entering surface waters of the state. The "High" priority facility has specific procedures that are included in Appendix K of the Storm Water Management Plan (SWMP).

### SECTION C- UPDATES AND PRIORITY REVISION

This inventory shall 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 shall be revised within 120 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

### SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

The following table identifies the Village'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 Village that has stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state. **Table 2** provides a listing of other properties that are owned and operated by the Village but do not have any

stormwater controls. In general, sites listed on Table 2 are vacant, residential parcels, or conservation easements.

Table 1

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented	
DPS Facility	Catch Basins (2) Dumpster (2) Vehicle Wash Area (1)	High	1, 3	See SWPPP/PIPP	
Village Hall	Catch Basins (1)	Med	1	Catch basin cleaning Street Sweeping	
Public Safety Facility	Catch Basins (2)	Low	1	Catch basin cleaning Street sweeping	
Beverly Park	Catch Basins (2) Bioretention Basin (1)	Low	1	Catch basin cleaning Street Sweeping	
Riverside Park	Catch Basins (1)	Low	1	Catch basin cleaning Street sweeping	
Structural Storm Water Controls		Structural Controls			
Village Catch Basins		887		887	
Village Outfalls/Points of Discharge		56		56	
Bioretention		1		1	

In addition, to the properties in Table 1, the Village of Beverly Hills also owns properties with no structural stormwater controls.

Table 2

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
Douglas Evans Nature Preserve	None	Low	0	None
Hidden Rivers Nature Preserve	None	Low	0	None

### 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 Village of Beverly Hills Department of Public Services (DPS) operations are conducted at their 18500 W. Thirteen Mile Road facility. This site is considered a high priority site due the following operations:

### DPS Facility - 18500 W. Thirteen Mile Road

- Maintenance and cleaning of vehicles and equipment
- Salt Storage
- Stockpiled materials

### **E.2** Vehicle Washing and Maintenance

Minor vehicle maintenance activities are conducted by DPS staff for the City's DPS vehicle fleet. Maintenance activities conducted by DPW staff include, but are not limited to, oil changes and other vehicle fluids. These activities are carried out indoors and floor drains are connected to the sanitary sewer system. More complicated maintenance and repairs are conducted by a private maintenance facility. A maintenance log is maintained to document all vehicle maintenance and repair activities.

Vehicle washing activities are conducted at either a commercial car wash or indoors at the DPS facility where the floor drains discharge to the sanitary sewer system.

A site specific standard operating procedure has been developed for this facility and is included. Please see the Storm Water Pollution Prevention Plan / Pollution Incident Prevention Plan (SWPPP/PIPP) for the Department of Public Services.

### SECTION F -CATCH BASIN MAINTENANCE PRIORITY

Catch basins that are inspected and maintained by the Village have been prioritized for routine inspection, maintenance, and cleaning. The criteria for the priority levels that include low, medium, and high are defined as follows:

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

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

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

The Villages' DPW/City Hall parking lot is a medium priority, swept twice a year. Remaining Village's catch basins have very little sediment accumulation rates, require little maintenance and are of low priority. There are currently no catch basins that have been assigned a high priority rating due to the rare occurrence of plugging, structure damage, and resident complaints. Village cleans catch basins when the sediment in the sump is no more than 50 % full. Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPS as needed. 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 medium priority rating. In the event the priority rating of a catch basin is changed, or new catch basins are constructed, this procedure will be updated and revised to reflect the change in priority within 120 days.

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

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. Catch basin structures in need of structural repairs are identified during the inspection and regular maintenance process based on the results of visual assessments conducted by the Village. Structure repairs are prioritized based on public safety concerns. Village owned catch basins are inspected concurrently with cleaning activities between April and November. Village cleans catch basins when the sediment in the sump is no more than 50 % full. The Village contracts with the Oakland County Water Resources Commissioner (OCWRC) to clean catch basins. A vactor truck is utilized to remove all solids and liquids from the structure to the extent possible. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property are not inspected, cleaned, or maintained by the Village.

### SECTION H - DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance is disposed of by OCWRC and wastes from street sweeping activities are disposed of properly at a landfill.

### SECTION I –STREET SWEEPING PRIORITIZATION

Village owned and maintained streets have been prioritized for street sweeping. The criteria for the priority levels that include low, medium, and high are defined as follows:

**Low Priority** – Residential streets within the Village are of low priority due to their minimal sediment accumulation rates. They are generally swept at least once per year.

**Medium Priority** – Major roads throughout the Village are of medium priority due to the higher rate of sediment accumulation rates in comparison to low priority residential streets. Medium priority areas are generally swept twice per year.

High Priority – Areas that are of high priority have a high rate of sediment accumulation and will require regular, frequent sweeping. These areas are typically located in areas where sediment is easily mobilized and transported by runoff. Additionally, areas that prompt resident complaint or are subject to excessive road sediments are also considered a high priority area. There are currently no areas that have been assigned a high priority rating due to excessive road sediments and resident complaints. However, if DPS receives a complaint, a determination of the area will be made by DPS staff to increase sweeping on a more frequent interval as well as a reclassify the area to high priority rating.

In the event a priority rating is changed, or new Village owned streets are constructed, this procedure will be updated and revised to reflect the change in priority within 30 days.

Street sweeping activities are conducted by a private contractor hired by the Village. The contractor may use both mechanical and regenerative air equipment. Collected sediment from street sweeping activities is disposed of as described in Section H. Major Roads with the Village considered Medium Priority over the rest of the Village side streets which are Low Priority. Street sweeping program activities are not implemented under the following conditions:

- Street sweeping is not conducted on County or State roads
- Sweeping activities are not conducted during wet and inclement weather
- Street sweeping activities is not conducted on private streets or uncurbed streets

### SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and street sweeping programs, the City also performs inspections of other storm water structural controls that are located throughout the Village.

### J.1 Bioretention Basin at Beverly Park

The routine procedure for the bioretention basin at Beverly Park is the annual inspection of the basin for sediment accumulation, the inlet and outlet structure for blockages. In most cases, maintenance activities involve the removal of trash/debris in the basin.

The Village does not have any other structural controls that are owned or maintained by the Village. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 30 days.

### SECTION K – NEW APPLICANT OWNED FACILITIES

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

### SECTION L – CERTIFIED PESTICIDE APPLICATOR

The DPS department has does not have a certified pesticide applicator on staff and does not apply or store pesticides, herbicides, or fertilizers on Village properties.

### **SECTION M – EMPLOYEE TRAINING**

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The Village participates in training opportunities that are made available by SEMCOG, Oakland County, the Alliance of Rouge Communities, and others as deemed appropriate. Employee training components for the Village of Beverly Hills DPS Department staff includes:

<b>Employees Trained</b>	Training Description and Frequency		
	Upon hire, employees will:		
New Beverly Hills DPS Employees	<ul> <li>View the Municipal Storm Water Pollution Prevention Storm Water training video.</li> </ul>		
	<ul> <li>Read and become familiar with the Village of Beverly Hills SOPs</li> </ul>		
	Participate in a job shadow program where new staff is paired with		
	a DPS foreman or grounds crewman.		
	<ul> <li>View the Municipal Storm Water Pollution Prevention Storm Water training video.</li> </ul>		
All Beverly Hills Facilities	<ul> <li>Review proper materials storage and handling.</li> </ul>		
Employees	<ul> <li>Review good housekeeping and pollution prevention practices.</li> </ul>		
	<ul> <li>Review samples of illicit discharges to the storm sewer system</li> </ul>		
	<ul> <li>Review Village of Beverly Hills Response Procedures.</li> </ul>		
Key Staff	<ul> <li>Attendance at key staff to relevant training workshops by the Alliance of Rouge Communities, SEMCOG, or others, when available.</li> </ul>		

### SECTION N –CONTRACT REQUIREMENTS AND OVERSIGHT

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

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

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

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

### SECTION O – COMPLAINT PROCEDURE

Complaints received by the public are logged by the Village and then routed to the appropriate department for follow up. Investigation into complaints routed to the DPS department is conducted within 48 hours after the complaint has been received by the Village. At that time, the DPS will make a determination to correct any problems or contact the responsible parties for appropriate action.

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

- o Number of complaints routed to the DPS department for follow up.
- Number of incidents that prompted additional corrective actions by the DPS or other responsible party

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

### SECTION P – PROCESS FOR REVISION

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

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

SPILL RESPONSE

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 2018** 

### **SECTION A – PERSONNEL**

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

Name	Phone
Beverly Hills Public Safety Dispatch	(248) 540-3400
Thomas Meszler – Public Services Director	(248) 646-6404
Chris Wilson – Village Manager	(248) 646-6404
Ellen Marshall – Village Clerk	(248) 646-6404

### A.1 Responsibilities

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

### **A.2 Emergency Contact Numbers**

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

Name	Affiliation	Phone	
Beverly Hills Public Safety Dispatch	Public Safety Department	(248) 540-2863	
Thomas Meszler – Public Services Director	Public Services Department	(248) 646-6404	
Chris Wilson – Village Manager	Village Manager	(248) 646-6404	
Ellen Marshall – Village Clerk	Village Clerk	(248) 646-6404	
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) 297-9400		
National Response Center	1-800-424-8802		

### **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 (MSDSs), 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 MSDS 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 MSDSs 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 MSDSs,
  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 MSDS 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 spilled 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
- Oakland County Health Division, 1200 N. Telegraph Road, Pontiac, Michigan 48341

Note: the optional report form EPQ 3465 can be found at: <a href="http://www.michigan.gov/deq/0,4561,7-135-3307">http://www.michigan.gov/deq/0,4561,7-135-3307</a> 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
- 2 Absorbent booms
- 20 Absorbant 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.

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

STREET MAINTENANCE AND WINTER OPERATIONS

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 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 operation and maintenance activities 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 –INVENTORY AND DESCRIPTION OF MATERIALS AND ACTIVITIES

The Village salt shed and materials stockpiles are located at the Department of Public Services Facility. The Pollution Prevention and Good Housekeeping activities that occur at this facility are located in the DPS Storm Water Pollution Prevention Plan and Pollution Incident Prevention Plan (SWPPP/PIPP). Municipal activities that occur at the facility include the following:

- Salt storage
- Stockpiled materials

#### **SECTION C – WINTER OPERATIONS**

The Village DPS field staff applies rock salt and brine as part of their deicing procedures during the winter months. Bulk storage of road salt and brine is located at the Department of Public Services Facility.

# **C.1** Salt Storage and Loading

The Village of Beverly Hills has a salt storage in a three-sided shed. The floor of the structure is paved. The structure is not located within 50 feet of a lake shore, stream bank, or wetland, nor is it located in a 100-year floodplain.

Loading of salt takes place at the structure entrance on a paved surface. This procedure is followed as there is not enough room to have both a loader and a truck inside the structure at the same time. The loading area is maintained after each use, with excess salt being swept back inside the storage facility.

Salt storage and application training is performed to DPS staff. Staff has been trained to minimize any track-out from loading operations. Salt application vehicles are calibrated before the winter season. Brine is obtained from the Road Commission for Oakland County, and the trucks are filled at their facility. Brine is not stored at the Village of Beverly Hills DPS.

# SECTION D - ROAD, PARKING LOT AND RIGHT-OF-WAY MAINTENANCE

Road and parking lot maintenance activities includes pothole repair, curb and gutter repair, and gravel road maintenance. These services are addressed by DPS field staff as determined in the field on an as needed basis. Materials are purchased in quantities as needed to reduce waste. Left over materials are stored in designated stockpile areas at the Department of Public Services Facility. In cases where a contractor is retained to perform these activities, a Village representative is on site to oversee the work and ensure that left over material, concrete

washout, and other associated pollutants are disposed of property. Disposing of concrete washout and other excess repair materials into the storm sewer is strictly prohibited by the City.

# **D.1** Stockpiled Materials

The stockpile area is located at the Department of Public Services facility. Materials are stockpiled at this location and include topsoil, cold patch, gravel, and other earthen materials as needed.

# **D.2** Unpaved Road Maintenance

Exposed soil areas are stabilized to prevent soil from eroding during rain events. This is particularly important on steep slopes. Dust suppressants are applied by a contractor to minimize airborne transfer of fine aggregates into the air. Quality aggregates are used to minimize transfer of fine aggregates onto paved surfaces.

# D.3 Right-of-Way Maintenance

Grass shoulders are mowed and maintained by the Village DPS.

# **D.4** Bridge Maintenance

Bridge and culvert crossings are inspected by an Engineering Consultant.

## 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.

# STANDARD OPERATING PROCEDURE POST CONSTRUCTION STORMWATER RUNOFF CONTROL

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**MARCH 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 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 site that undergo development or significant redevelopment.

# SECTION B – ADOPTION OF COUNTY STANDARDS

The Village of Beverly Hills currently follows its current ordinances for stormwater management. The Village intends to adopt the Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities (storm water management and water quality) once they have been revised and approved by MDEQ. The OCWRC standards would take effect at the time the MS4 Permit goes into effect.

#### **SECTION C – MEASURABLE GOALS**

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

- Number of stormwater site plan reviews requested and completed
- Number of maintenance violations of constructed BMPs
- Number of instances where the Village had to undertake corrective measures

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

# **SECTION D – PROCESS FOR REVISION**

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

# STANDARD OPERATING PROCEDURE CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**March 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 BMPs to meet the minimum control measure requirements for the construction stormwater runoff control program to the maximum extent practicable.

The Oakland Water Resources Commissioner (OCWRC) is a County Enforcement Agency under the Part 91 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as Amended. As an enforcing agency, the OCWRC is responsible for administering the Soil Erosion and Sedimentation Control Act in Oakland County communities that do not have a local Soil Erosion Control Program.

The following standard operating procedure provides a description of the procedures the Village 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 – APPLICATION PROCEDURE

Prior to any earth disturbance, the Village of Beverly Hills will ensure 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. The requirement to obtain an SESC permit is documented in the Oakland County Water Resources Commissioners SESC Control Manual.

- B.1 OCWRC SESC Control Manual, Implementation Procedures, Section V, Subsection D, Item 1
  - "An application for a review of proposed soil erosion and sedimentation control measures for a site shall be sub mitted to the Office of the Oakland County Water Resources Commissioner by the landowner undertaking the earth change on that property. An owner or developer may have an agent complete a permit application provided an original notarized letter authorizing the agent to represent the owner or developer is to be submitted with the application."
- B.2 OCWRC SESC Control Manual, Implementation Procedures, Section V, Subsection A, Item 5

"The application shall be accompanied by one (1) complete set of the proposed soil erosion and sedimentation control plan, as set forth in Section V, subsection B."

B.3 OCWRC SESC Control Manual, Implementation Procedures, Section V, Subsection A – Permit Exemptions.

"A Permit Exemption Affidavit must be obtained for sites that do not require a permit.

- 1. Projects that are exempt from obtaining a permit are as follows:
  - a. The project is less than one (1) acre of disturbance or is over 500 feet from any open drain, lake, stream, river, pond, or wetland.
  - b. A project engaged in logging. The exemption does not include access roads to and from the project site or any ancillary activities associated with the logging operations.
  - c. A project engaged in metallic or mineral mining. The exemption does not include access roads to and from the project site and mining does not include the removal of clay, gravel, sand, peat, or topsoil or any ancillary activities associated with the mining operations.
  - d. A project engaged in plowing or tilling of the land for the purpose of crop production or harvesting of crops. The exemption does not include access roads to and from the project site.
- 2. Exemptions provided in this section shall not be construed as exemptions from installing and maintaining the soil erosion and sedimentation controls for the project as required by Part 91. All enforcement procedures as described in Section IX, subsection B can be and will be enforced if the activities exempted cause or result in a violation of Part 91 or produce a significant erosion hazard or sedimentation problem.
- 3. Requirements of Section V, subsection A are not applicable to existing projects on which firm bids have been taken or awarded prior to March 1, 1975. However, these requirements will be applicable if it is determined by this office that an earth change project is creating a severe soil erosion or sedimentation problem."

# SECTION C – INSPECTIONS/COMPLAINTS

As the Part 91 regulating authority, the Oakland County Water Resources Commissioner will inspect active construction sites that have obtained a Soil Erosion and Sedimentation Control Permit.

C.1 OCWRC SESC Control Manual, Implementation Procedures, Section IX, Subsection A, Item 1 – Schedule of Inspections.

"On-site inspections before, during and after any earth change activity for which a permit has been issued will be performed as required by the schedule set by the site classification or as necessary due to the extent of erosion and sedimentation activity. Sites where a Notice of Determination of Violation has been issued shall be inspected five (5) working days after said Notice was issued."

Complaints regarding soil erosion and sedimentation issues made by the public will be forward to the Oakland County Water Resources Commissioners office. At that time, the Village will request a site inspection to document any violations of the soil erosion and sedimentation/grading permit within 48 hours and pursue enforcement actions as appropriate. See the Enforcement Response Procedure for a summary of the enforcement protocols to ensure compliance with the OCWRC Part 91 program.

# **SECTION D – MEASUREABLE GOALS**

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

- Number of Part 91 related complaints received.
- Number of Part 91 permits issued.
- Number of enforcement actions taken to achieve compliance with the Part 91 program.

These metrics will be tracked over the reporting cycle that is specified in the Village's Certificate of Coverage for the MS4 Permit.

#### **SECTION E – REPORTABLE DISCHARGES**

The Village 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 Storm Water Management Plan (SWMP), the Village/OCWRC will notify the MDEQ through the Pollution Emergency Alert System (PEAS) at 1-800-292-4706.

#### SECTION F - STATE OF MICHIGAN PERMIT BY RULE

The Village 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 G – PROCESS FOR REVISION

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

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

STREET MAINTENANCE AND WINTER OPERATIONS

THE VILLAGE OF BEVERLY HILLS

18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 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 operation and maintenance activities 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 –INVENTORY AND DESCRIPTION OF MATERIALS AND ACTIVITIES

The Village salt shed and materials stockpiles are located at the Department of Public Services Facility. The Pollution Prevention and Good Housekeeping activities that occur at this facility are located in the DPS Storm Water Pollution Prevention Plan and Pollution Incident Prevention Plan (SWPPP/PIPP). Municipal activities that occur at the facility include the following:

- Salt storage
- Stockpiled materials

#### **SECTION C – WINTER OPERATIONS**

The Village DPS field staff applies rock salt and brine as part of their deicing procedures during the winter months. Bulk storage of road salt and brine is located at the Department of Public Services Facility.

# **C.1** Salt Storage and Loading

The Village of Beverly Hills has a salt storage in a three-sided shed. The floor of the structure is paved. The structure is not located within 50 feet of a lake shore, stream bank, or wetland, nor is it located in a 100-year floodplain.

Loading of salt takes place at the structure entrance on a paved surface. This procedure is followed as there is not enough room to have both a loader and a truck inside the structure at the same time. The loading area is maintained after each use, with excess salt being swept back inside the storage facility.

Salt storage and application training is performed to DPS staff. Staff has been trained to minimize any track-out from loading operations. Salt application vehicles are calibrated before the winter season. Brine is obtained from the Road Commission for Oakland County, and the trucks are filled at their facility. Brine is not stored at the Village of Beverly Hills DPS.

# SECTION D - ROAD, PARKING LOT AND RIGHT-OF-WAY MAINTENANCE

Road and parking lot maintenance activities includes pothole repair, curb and gutter repair, and gravel road maintenance. These services are addressed by DPS field staff as determined in the field on an as needed basis. Materials are purchased in quantities as needed to reduce waste. Left over materials are stored in designated stockpile areas at the Department of Public Services Facility. In cases where a contractor is retained to perform these activities, a Village representative is on site to oversee the work and ensure that left over material, concrete

washout, and other associated pollutants are disposed of property. Disposing of concrete washout and other excess repair materials into the storm sewer is strictly prohibited by the City.

# **D.1** Stockpiled Materials

The stockpile area is located at the Department of Public Services facility. Materials are stockpiled at this location and include topsoil, cold patch, gravel, and other earthen materials as needed.

# **D.2** Unpaved Road Maintenance

Exposed soil areas are stabilized to prevent soil from eroding during rain events. This is particularly important on steep slopes. Dust suppressants are applied by a contractor to minimize airborne transfer of fine aggregates into the air. Quality aggregates are used to minimize transfer of fine aggregates onto paved surfaces.

# D.3 Right-of-Way Maintenance

Grass shoulders are mowed and maintained by the Village DPS.

# **D.4** Bridge Maintenance

Bridge and culvert crossings are inspected by an Engineering Consultant.

## 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.

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

SPILL RESPONSE

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 2018** 

## **SECTION A – PERSONNEL**

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

Name	Phone
Beverly Hills Public Safety Dispatch	(248) 540-3400
Thomas Meszler – Public Services Director	(248) 646-6404
Chris Wilson – Village Manager	(248) 646-6404
Ellen Marshall – Village Clerk	(248) 646-6404

# A.1 Responsibilities

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

# **A.2 Emergency Contact Numbers**

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

Name	Affiliation	Phone
Beverly Hills Public Safety Dispatch	Public Safety Department	(248) 540-2863
Thomas Meszler – Public Services Director	Public Services Department	(248) 646-6404
Chris Wilson – Village Manager	Village Manager	(248) 646-6404
Ellen Marshall – Village Clerk	Village Clerk	(248) 646-6404
MDEQ 24-Hour Pollution Emergency Alerting System (PEAS)		1-800-292-4706
MDEQ Southeast Michigan District Office		(586) 753-3700
City of Detroit Wastewater Treatment Plant		(313) 297-9400
National Response Center		1-800-424-8802

## **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 (MSDSs), 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 MSDS 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 MSDSs 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 MSDSs,
  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 MSDS 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 spilled 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
- Oakland County Health Division, 1200 N. Telegraph Road, Pontiac, Michigan 48341

Note: the optional report form EPQ 3465 can be found at: <a href="http://www.michigan.gov/deq/0,4561,7-135-3307">http://www.michigan.gov/deq/0,4561,7-135-3307</a> 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
- 2 Absorbent booms
- 20 Absorbant 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.

# STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

# **GENERAL PROCEDURES**

THE VILLAGE OF BEVERLY HILLS

18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



**REVISED AUGUST 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 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

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

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

Based on these criteria, the potential for each facility to discharge pollutants to the waters of the state were rated high, medium, or low. For "low" priority facilities where no assessment factors are present, catch basin cleaning and street sweeping will be performed as indicated in the applicable procedures for these activities. For "medium" priority facilities, appropriate BMPs are considered based on the assessment factors present to prevent or minimize the potential for pollutants from entering surface waters of the state. The "High" priority facility has specific procedures that are included in Appendix K of the Storm Water Management Plan (SWMP).

## SECTION C- UPDATES AND PRIORITY REVISION

This inventory shall 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 shall be revised within 120 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

#### SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

The following table identifies the Village'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 Village that has stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state. **Table 2** provides a listing of other properties that are owned and operated by the Village but do not have any

stormwater controls. In general, sites listed on Table 2 are vacant, residential parcels, or conservation easements.

Table 1

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPS Facility	Catch Basins (2) Dumpster (2) Vehicle Wash Area (1)	High	1, 3	See SWPPP/PIPP
Village Hall	Catch Basins (1)	Med	1	Catch basin cleaning Street Sweeping
Public Safety Facility	Catch Basins (2)	Low	1	Catch basin cleaning Street sweeping
Beverly Park	Catch Basins (2) Bioretention Basin (1)	Low	1	Catch basin cleaning Street Sweeping
Riverside Park	Catch Basins (1)	Low	1	Catch basin cleaning Street sweeping
Structural Storm Water Controls		Structural Controls		
Village Catch Basins		887		
Village Outfalls/Points of Discharge		56		
Bioretention		1		

In addition, to the properties in Table 1, the Village of Beverly Hills also owns properties with no structural stormwater controls.

Table 2

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
Douglas Evans Nature Preserve	None	Low	0	None
Hidden Rivers Nature Preserve	None	Low	0	None

# 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 Village of Beverly Hills Department of Public Services (DPS) operations are conducted at their 18500 W. Thirteen Mile Road facility. This site is considered a high priority site due the following operations:

## DPS Facility - 18500 W. Thirteen Mile Road

- Maintenance and cleaning of vehicles and equipment
- Salt Storage
- Stockpiled materials

# **E.2** Vehicle Washing and Maintenance

Minor vehicle maintenance activities are conducted by DPS staff for the City's DPS vehicle fleet. Maintenance activities conducted by DPW staff include, but are not limited to, oil changes and other vehicle fluids. These activities are carried out indoors and floor drains are connected to the sanitary sewer system. More complicated maintenance and repairs are conducted by a private maintenance facility. A maintenance log is maintained to document all vehicle maintenance and repair activities.

Vehicle washing activities are conducted at either a commercial car wash or indoors at the DPS facility where the floor drains discharge to the sanitary sewer system.

A site specific standard operating procedure has been developed for this facility and is included. Please see the Storm Water Pollution Prevention Plan / Pollution Incident Prevention Plan (SWPPP/PIPP) for the Department of Public Services.

## SECTION F -CATCH BASIN MAINTENANCE PRIORITY

Catch basins that are inspected and maintained by the Village have been prioritized for routine inspection, maintenance, and cleaning. The criteria for the priority levels that include low, medium, and high are defined as follows:

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

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

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

The Villages' DPW/City Hall parking lot is a medium priority, swept twice a year. Remaining Village's catch basins have very little sediment accumulation rates, require little maintenance and are of low priority. There are currently no catch basins that have been assigned a high priority rating due to the rare occurrence of plugging, structure damage, and resident complaints. Village cleans catch basins when the sediment in the sump is no more than 50 % full. Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPS as needed. 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 medium priority rating. In the event the priority rating of a catch basin is changed, or new catch basins are constructed, this procedure will be updated and revised to reflect the change in priority within 120 days.

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

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. Catch basin structures in need of structural repairs are identified during the inspection and regular maintenance process based on the results of visual assessments conducted by the Village. Structure repairs are prioritized based on public safety concerns. Village owned catch basins are inspected concurrently with cleaning activities between April and November. Village cleans catch basins when the sediment in the sump is no more than 50 % full. The Village contracts with the Oakland County Water Resources Commissioner (OCWRC) to clean catch basins. A vactor truck is utilized to remove all solids and liquids from the structure to the extent possible. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property are not inspected, cleaned, or maintained by the Village.

# SECTION H - DISPOSAL OF COLLECTED MATERIAL

Collected material from catch basin maintenance is disposed of by OCWRC and wastes from street sweeping activities are disposed of properly at a landfill.

# SECTION I –STREET SWEEPING PRIORITIZATION

Village owned and maintained streets have been prioritized for street sweeping. The criteria for the priority levels that include low, medium, and high are defined as follows:

**Low Priority** – Residential streets within the Village are of low priority due to their minimal sediment accumulation rates. They are generally swept at least once per year.

**Medium Priority** – Major roads throughout the Village are of medium priority due to the higher rate of sediment accumulation rates in comparison to low priority residential streets. Medium priority areas are generally swept twice per year.

High Priority – Areas that are of high priority have a high rate of sediment accumulation and will require regular, frequent sweeping. These areas are typically located in areas where sediment is easily mobilized and transported by runoff. Additionally, areas that prompt resident complaint or are subject to excessive road sediments are also considered a high priority area. There are currently no areas that have been assigned a high priority rating due to excessive road sediments and resident complaints. However, if DPS receives a complaint, a determination of the area will be made by DPS staff to increase sweeping on a more frequent interval as well as a reclassify the area to high priority rating.

In the event a priority rating is changed, or new Village owned streets are constructed, this procedure will be updated and revised to reflect the change in priority within 30 days.

Street sweeping activities are conducted by a private contractor hired by the Village. The contractor may use both mechanical and regenerative air equipment. Collected sediment from street sweeping activities is disposed of as described in Section H. Major Roads with the Village considered Medium Priority over the rest of the Village side streets which are Low Priority. Street sweeping program activities are not implemented under the following conditions:

- Street sweeping is not conducted on County or State roads
- Sweeping activities are not conducted during wet and inclement weather
- Street sweeping activities is not conducted on private streets or uncurbed streets

# SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and street sweeping programs, the City also performs inspections of other storm water structural controls that are located throughout the Village.

# J.1 Bioretention Basin at Beverly Park

The routine procedure for the bioretention basin at Beverly Park is the annual inspection of the basin for sediment accumulation, the inlet and outlet structure for blockages. In most cases, maintenance activities involve the removal of trash/debris in the basin.

The Village does not have any other structural controls that are owned or maintained by the Village. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 30 days.

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

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

# SECTION L – CERTIFIED PESTICIDE APPLICATOR

The DPS department has does not have a certified pesticide applicator on staff and does not apply or store pesticides, herbicides, or fertilizers on Village properties.

#### **SECTION M – EMPLOYEE TRAINING**

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The Village participates in training opportunities that are made available by SEMCOG, Oakland County, the Alliance of Rouge Communities, and others as deemed appropriate. Employee training components for the Village of Beverly Hills DPS Department staff includes:

<b>Employees Trained</b>	Training Description and Frequency
	Upon hire, employees will:
New Beverly Hills DPS Employees	<ul> <li>View the Municipal Storm Water Pollution Prevention Storm Water training video.</li> </ul>
	<ul> <li>Read and become familiar with the Village of Beverly Hills SOPs</li> </ul>
	Participate in a job shadow program where new staff is paired with
	a DPS foreman or grounds crewman.
All Beverly Hills Facilities Employees	<ul> <li>View the Municipal Storm Water Pollution Prevention Storm Water training video.</li> </ul>
	<ul> <li>Review proper materials storage and handling.</li> </ul>
	<ul> <li>Review good housekeeping and pollution prevention practices.</li> </ul>
	<ul> <li>Review samples of illicit discharges to the storm sewer system</li> </ul>
	<ul> <li>Review Village of Beverly Hills Response Procedures.</li> </ul>
Key Staff	<ul> <li>Attendance at key staff to relevant training workshops by the Alliance of Rouge Communities, SEMCOG, or others, when available.</li> </ul>

## SECTION N –CONTRACT REQUIREMENTS AND OVERSIGHT

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

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

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

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

## SECTION O – COMPLAINT PROCEDURE

Complaints received by the public are logged by the Village and then routed to the appropriate department for follow up. Investigation into complaints routed to the DPS department is conducted within 48 hours after the complaint has been received by the Village. At that time, the DPS will make a determination to correct any problems or contact the responsible parties for appropriate action.

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

- o Number of complaints routed to the DPS department for follow up.
- Number of incidents that prompted additional corrective actions by the DPS or other responsible party

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

## SECTION P – PROCESS FOR REVISION

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

# STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

THE VILLAGE OF BEVERLY HILLS 18500 W. THIRTEEN MILE ROAD, BEVERLY HILLS, MICHIGAN 48025



March 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 procedure for Enforcement Response to address violations of the ordinance(s) or regulatory mechanism(s) identified in the Stormwater Management Plan.

#### **SECTION B – GENERAL PENALTY**

Chapter 1 General Provision of the Village of Beverly Hills Code of Ordinances defines the penalties levied by the Village for ordinance violations in Section 1.06a. The section specifically defines penalties for misdemeanors or civil infractions and continuing violations.

# **B.1** Chapter 1, Section 1.06a – Penalties

"Standard Penalty. Unless another penalty is specifically provided by this code for violation of any particular provision, section or chapter, any person violating any provision of this code, or any rule or regulation adopted or issued in pursuance thereof, or any provision of any code adopted herein by reference, shall be guilty of a misdemeanor, and upon conviction shall be fined not more than \$500 or imprisoned in the County jail for a period not to exceed ninety-three (93) days, or shall be both fined and imprisoned in the discretion of the court and shall pay the costs of prosecution. In addition to the penal provisions contained herein, the Village may resort to a Court of Equity or use any other legal means to enforce the terms and/or accomplish the purpose of this code."

# **B.2** Chapter 1, Section 1.06b – Penalties

"Commitment. The person upon whom any fine or penalty is imposed for violation of any provision of this code or any ordinance of the Village, upon order of the court before whom the conviction is had, may be committed to the Village or County jail as provided by law, or to any other place provided by ordinance for the incarceration of offenders until the fine, penalty, and costs are fully paid. No imprisonment, however, shall exceed ninety-three (93) days for any one offense."

## **SECTION C- Procedure**

Each ordinance/regulatory mechanism within this jurisdiction includes an enforcement response to violations of the ordinance.

# C.1 PART 91 MUNICIPAL ENFORCEMENT AGENCY

The Village of Beverly Hills is not a Municipal Enforcement Agency. The Oakland Water Resources Commissioner (OCWRC) is a County Enforcement Agency under the Part 91 of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451, as Amended. As an enforcing agency, the OCWRC is responsible for administering the Soil Erosion and Sedimentation Control Act in Oakland County communities that do not have a local Soil Erosion Control Program.

# C.1 OCWRC SESC Control Manual, Implementation Procedures, Section I – Legal Authority

"The following procedures are adopted under the authority granted by Part 91 of the Natural Resources and Environmental Protection Act, Act 451 of the Public Acts of 1994, as revised, being Sections 324.9101 to 324.9123 of the Michigan Compiled Laws Annotated ("Part 91"), (Soil Erosion and Sedimentation Control), as amended, Michigan Compiled Laws Annotated 46.11m and 46.10b, and R 323.1701, et seq., of the Michigan Administrative Code, ("State Regulations")."

# C.2 OCWRC SESC Control Manual, Implementation Procedures, Section IX, Item B(1)(a) – Enforcement – Issuance of Notice of Determination of Violation (N of D)

"A N of D requires that the site meet soil erosion control requirements within five working days of receipt of the violation notice. If compliance is not achieved, the alleged violator(s) may be subject to the following:

- i. A civil fine of not less than \$2,500 or more than \$25,000 per day for each violation.
- ii. The issuance of a civil infraction
- iii. The County Enforcing Agent installing the required soil erosion control measures and a lien for the cost of this work filed against the property
- iv. A civil action where fines, penalties, cost, damages and injunctive or other relief will be sought."

# C.3 OCWRC SESC Control Manual, Implementation Procedures, Section IX, Item B(1)(a) – Enforcement – Violation State Civil Infraction

- 1. "A person who violates any provision of Part 91, the regulations promulgated hereunder, including, without limitation, a Notice of Determination of Violation, permit, consent, or other agreement, shall be guilty of a State civil infraction, subject to a fine not to exceed \$2,500 for each infraction in the first 5 days. A civil infraction shall not be issued until the time has elapsed for compliance after a Notice of Determination of Violation."
- 2. "Except as otherwise provided by this section, the procedures for a municipal civil infraction shall be as set forth in Michigan Court Rules, Rule 4.101 et seq."

# C.4 OCWRC SESC Control Manual, Implementation Procedures, Section IX, Item B(1)(a) – Enforcement – Knowing Violations; Penalties

"Any person who knowingly violates Part 91 is subject to a civil fine of not less than \$10,000 per day for each violation."

# **C.5** Chapter 30-Surface Water Drainage

Illicit discharges and connections are to be corrected within 30 days of notice of violation (as practicable) as will be identified in Village's IDEP ordinance, once developed.

# C.6 Chapter 22 Section 22.09 – Site Development Requirements

#### SECTION D – ENFORCEMENT TRACKING

The Village 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 Village and the Oakland County Water Resources Commissioner.

- 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 City's Enforcement Response
- 10. Schedules for Achieving Compliance
- 11. Date the Violation was Resolved

In addition to the enforcement mechanisms that will be noted in the IDEP ordinance, additional tracking of instances of noncompliance occurs and includes information identified in the Spill Notification/Complaint/Outfall Investigation Reporting Form, attachments included.

#### SECTION E - PROCESS FOR REVISION

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

# **Village of Beverly Hills**

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

# **Outfall and Point of Discharge Information**

Provide the following information for each of the applicant's MS4 outfalls and points of discharge within the regulated area: identification number, description of whether the discharge is from an outfall or point of discharge, and the surface water of the state that receives the discharge. An outfall means a discharge point from an MS4 directly to surface waters of the state. A point of discharge means a discharge from an MS4 to an MS4 owned or operated by another public body. In the case of a point of discharge, the surface water of the state is the ultimate receiving water from the final outfall. Please note 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.

Attachment: Appendix A – List of Village Outfalls

Comment:

#### **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.

None

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

STORM WATER MANAGEMENT PROGRAM (SWMP)

This Application requires a description of the Best Management Practices (BMPs) the applicant will implement for each minimum control measure and the applicable water quality requirements during this permit cycle. The applicant shall incorporate the BMPs to develop a SWMP as part of the Application. The SWMP shall be developed, implemented, and enforced to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable and protect water quality in accordance with the appropriate water quality requirements of the NREPA 451, Public Acts of 1994, Part 31, and the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq.). The Maximum Extent Practicable may be met by implementing the BMPs identified in the SWMP and demonstrating the effectiveness of the BMPs. The applicant shall attach any appropriate and necessary documentation to demonstrate compliance with the six minimum control measures and applicable water quality requirements as part of the Application. The applicant shall complete this Application to the best of its knowledge and ensure that it is true, accurate, and meets the minimum requirements for a SWMP to the Maximum Extent Practicable. Several minimum control measures include a statement requesting the applicant to indicate in the response if you are, or will be, working collaboratively with watershed or regional partners on any or all activities to meet the minimum control measure requirements. If the applicant chooses to work collaboratively with watershed or regional partners to implement parts of the SWMP, each applicant will be responsible for complying with the minimum permit requirements. For purposes of this Application, a procedure means a written process, policy or other mechanism describing how the applicant will implement minimum requirements. When answering the questions in this section of the Application, the applicant's MS4 encompasses what the applicant identified in Sections 4. The applicant shall include a measurable goal for each BMP. Each measurable goal shall include, as appropriate, a schedule for BMP implementation (months and years), including interim milestones and the frequency of the action. Each measurable goal shall have a measure of assessment to measure progress towards achieving the measurable goal. A United States Environmental Protection Agency (USEPA) guidance document on measurable goals is available at the link below.

#### **Enforcement Response Procedure (ERP)**

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

1. Provide the ERP. The ERP shall include the applicant's expected response to violations to compel compliance with an ordinance or regulatory mechanism implemented by the applicant in the SWMP (e.g., written notices, citations, and fines). The ERP shall contain a method for tracking instances of non-compliance, including, as appropriate, the entity responsible for violating the applicant's ordinance or regulatory mechanism, the date and location of the violation, a description of the enforcement response used, a schedule for returning to compliance, and the date the violation was resolved. The applicant may keep an electronic file or hard copy file of the enforcement tracking. For best results please upload one document at a time.

Attachment: Appendix B – Enforcement Response Procedure

Comment: The Village provides information on how to report a complaint/concern under the Environmental area on the "Community" tab on the Village website. Copy of the Village Ordinance Chapter 30 Surface Drainage in Appendix

#### 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**

Provide the procedures that describe the current and proposed BMPs to meet the minimum control measure requirements for the PPP to the maximum extent practicable as required below. It is recommended that files be separated and then converted to a PDF format before being attached below to meet the file size limit. For best results please upload one document at a time.

Attachment: Appendix C - Collaborative Public Participation/involvement Program Comment:

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

Appendix C - Collaborative Public Participation/Involvement Program, 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):

Appendix C - Collaborative Public Participation/Involvement Program, Section D

# Section 6: Public Education Program

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the Public Education Program (PEP) 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 PEP during the permit cycle. The following questions represent the minimum requirements for the PEP. 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.

#### **PEP Procedures**

Provide the procedures that describe the current and proposed BMPs to meet the minimum control measure requirements for the PEP to the maximum extent practicable as required below. For best results please upload one document at a time.

Attachment: *Appendix D - Collaborative Public Education Program* Comment:

- 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). Appendix D Collaborative Public Education Program, Section A, Page 2
- 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.
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
  - 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3

- 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 Table 2. Appendix D Collaborative Public Education Program, Section C, Page 3
- 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 Table 2. Appendix D - Collaborative Public Education Program, Section C, Page 3

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.

Appendix D - Collaborative Public Education Program, Section D, Page 13

# Section 7: Illicit Discharge Elimination Program

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the Illicit Discharge Elimination Program (IDEP) to the Maximum Extent Practicable, which shall be incorporated into the SWMP. The following questions represent the minimum control measure requirements for the IDEP. 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. Please indicate in your response if you are or will be working collaboratively with watershed or regional partners on any or all BMPs in the IDEP during the permit cycle (e.g., identify collaborative efforts in the procedures). The following definitions apply to the terms used below: • Illicit Discharge: Any discharge to, or seepage into, an MS4 that is not composed entirely of storm water or uncontaminated groundwater except discharges pursuant to an NPDES permit. A discharge that originates from the applicant's property and meets the illicit discharge definition is considered an illicit discharge. • Illicit Connection: A physical connection to an MS4 that primarily conveys non-storm water discharges other than uncontaminated groundwater into the MS4; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

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

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

Provide the procedure that describes the current and proposed BMPs to meet the minimum control measure requirements for the IDEP to the maximum extent practicable as required below.

Attachments: Appendix E - Collaborative Illicit Discharge Elimination Program, Appendix J - Surface Water Drainage Ordinance, Appendix H - P2GH Spill Response SOP Comment:

# **Storm Sewer System Map**

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

Comment: Appendix E - Rouge River Collaborative IDEP, Section D. As-built plans for utilities and developments are maintained by the Village and can be found at Village Hall.

#### Illicit Discharge Identification and Investigation

8. The MS4 may be prioritized for detecting non-storm water discharges during the permit cycle. The goal of the prioritization process is to target areas with high illicit discharge potential. If prioritizing, provide the reference to

the procedure submitted above with the process for selecting each priority area using the list below. (e.g., Attachment A, page 3, Section b.)

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

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

Appendix E - Rouge River Collaborative IDEP, 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.

Appendix E - Rouge River Collaborative IDEP, 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. As part of the procedure, the applicant may submit an interagency agreement with the owner or operator of the downstream MS4 identifying responsibilities for ensuring an illicit discharge is eliminated if originating from the applicant's point(s) of discharge. The interagency agreement would eliminate the requirement for performing a field observation at that point(s) of discharge. Areas not covered by the interagency agreement shall be identified with a schedule for performing field observations included in the procedure. The focus of the field observation shall be to observe the following:
  - · Presence/absence of flow
  - · Water clarity
  - · Deposits/stains on the discharge structure or bank
  - Color
  - Vegetation condition
  - Odor
  - Structural condition
  - · Floatable materials
  - · Biology, such as bacterial sheens, algae, and slimes

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

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #2

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.

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #3

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

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #3

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

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #5

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."

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #5

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

Appendix H - P2GH Spill Response SOP, 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.
- 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.

Appendix E - Rouge River Collaborative IDEP, 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 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.

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP #4

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

Appendix E - Rouge River Collaborative IDEP, 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).

Appendix E – Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E. Appendix J - Surface Water Drainage Ordinance, Section 30.06.

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.

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Section 30.06.

- 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
  - i. 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.

Appendix E – Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Section 30.06.

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.

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Section 30.07.

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.

Appendix E - Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Section 30.07.

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.

Appendix E – Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Section 30.10.

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.

Appendix E – Rouge River Collaborative IDEP, Section D, IDEP#7 and Attachment E.

Appendix J - Surface Water Drainage Ordinance, Sections 30.11 and 30.12.

#### **Section 8. Construction Storm Water Runoff Control Program**

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

for the construction storm water runoff control program to the maximum extent practicable, which shall be incorporated into the SWMP. Please indicate in your response if you are or will be working collaboratively with watershed or regional partners on any or all requirements of this program during the permit cycle (e.g., identify collaborative efforts in the procedures). The following questions represent the minimum control measure requirements for the construction storm water runoff control program. 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 requirements of the Construction Storm Water Runoff Control Program during the permit cycle? No

## **Qualifying Local Soil Erosion and Sedimentation Control Programs**

27. Is the applicant a Part 91 Agency? No If yes, choose type:

No the applicant relies on the following Qualifying Local Soil Erosion and Sedimentation Control Program (Part 91 Agency) The Oakland County Water Resources Commissioner, a County Enforcement Agency

#### **Construction Storm Water Runoff Control**

Provide the procedures that describe the current and proposed BMPs to meet the minimum control measure requirements for the Construction Storm Water Runoff Control Program to the maximum extent practicable as required below. It is recommended that files be separated and then converted to a PDF format before being attached below to meet the file size limit. For best results please upload one document at a time.

Attachment: Appendix J - OCWRC SESC Implementation Program, Appendix F - Construction Site Stormwater Runoff Control SOP

Comment:

- 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.
- Appendix F Construction Site Stormwater Runoff Control SOP, Section C. When an issue is discovered the Village contacts OCWRC for investigation and enforcement of the SESC Permit, and requires clean up.
- 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.

Appendix F - Construction Site Stormwater Runoff Control SOP, Section F. If pollutants like pesticides, petroleum, or construction chemicals are discharged, the MDEQ PEAS Hotline is contacted.

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.

Appendix F - Construction Site Stormwater Runoff Control SOP, Section B.

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). Appendix F - Construction Site Stormwater Runoff Control SOP, Section F. All permits (through Part 91, Permit By Rule) are required prior to the start of construction.

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

Post-Construction Storm Water Runoff Program Procedures, Ordinances, and regulatory Mechanisms
Provide the procedures that describes the current and proposed BMPs to meet the minimum control measure
requirements for the Post-Construction Storm Water Runoff Program to the maximum extent practicable as
required below. It is recommended that files be separated and then converted to a PDF format before being
attached below to meet the file size limit. For best results please upload one document at a time.

Attachment: Appendix G – Post Construction, Appendix J - Zoning Ordinance, Section 22.090.010

Comment: Appendix G – Post Construction Stormwater Runoff Control, Section B. It is the City's understanding
that MDEQ is negotiating the development of stormwater design standards with Oakland County to meet the
MS4 permit requirements. The City is in the process of reviewing the summary of the draft PCC design
standards being proposed by Oakland County Water Resources Commissioner's Office. The City will begin the
process of drafting an ordinance to adopt the standards. Once MDEQ has approved Oakland County's
stormwater design standards, the City will review them to assess their applicability. If revisions are needed, the
City will prepare separate design standards.

## **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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

#### **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

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

#### **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
- 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

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

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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?

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

#### **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.

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

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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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.

Not Applicable

#### **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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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.

Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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

43. An applicant may choose to allow for the approval of off-site mitigation for redevelopment projects that cannot meet 100 percent of the performance standards on-site after maximizing storm water retention. Off-site mitigation refers to BMPs implemented at another location within the same jurisdiction and watershed/sewershed as the original project. A watershed is the geographic area included in 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.

The Village of Beverly Hills does not currently have an ordinance or regulatory mechanism that meets the optional requirements. The Village will not be pursuing this option.

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

The Village of Beverly Hills does not currently have an ordinance or regulatory mechanism that meets the optional requirements. The Village will not be pursuing this option.

- 45. Provide the reference 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.
- 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.

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

#### 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.
- Appendix G Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.
- 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.
- Appendix G Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.
- 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.
- Appendix G Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

#### **Long-term Operation and Maintenance 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. Appendix J Zoning Ordinance, Section 22.090.080. Appendix G Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.
- 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.

Appendix J – Zoning Ordinance, Section 22.090.080. Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

- 58. Does the maintenance agreement or other legal mechanism allow the applicant to complete the following?
  - Inspect the structural or vegetative BMP
  - Perform the necessary maintenance or corrective actions neglected by the BMP owner or operator
  - Track the transfer of operation and maintenance responsibility of the BMP (e.g., deed restrictions)

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.

Appendix J – Zoning Ordinance, Section 22.090.080. Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

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.

Appendix J – Zoning Ordinance, Section 22.090.080. Appendix G – Post Construction Stormwater Runoff Control, Section B. The Village intends to adopt the revised Oakland County Water Resources Commissioner (OCWRC) Engineering Standards for Storm Water Facilities once they are completed and approved by the MDEQ.

## Section 10. Pollution Prevention and Good Housekeeping Program

The applicant shall describe the current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable, which shall be incorporated into the SWMP. The applicant shall develop and implement a Pollution Prevention and Good Housekeeping Program to prevent or reduce the discharge of pollutants from municipal facilities and operations.

The following definitions apply to the terms used below:

- Fleet: A group of vehicles owned or operated as a unit.
- Maintenance (includes, but not limited to): adding/changing vehicle fluids, fueling, lubrication, painting, mechanical repairs, parts degreasing, and vehicle/equipment washing.
- Storage Yard (includes, but not limited to): areas where vehicles are stored longer than
  overnight/weekend; areas where road maintenance materials are stored; areas where vehicle
  maintenance materials are stored; areas where chemicals in bulk are stored; areas where catch basin
  cleaning wastes are stored; and areas where maintenance equipment such as mowers, tractors, vactor
  trucks, and sweepers is stored.

Please complete the questions below as appropriate. A "Not Applicable" response is appropriate in cases where the applicant does not own or operate a municipal facility or storm water structural control or does not perform the operation in the question. 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.

# **Pollution Prevention and Good Housekeeping Procedures**

Provide the procedures that describe the current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable as required below. It is recommended that files be separated and then converted to a PDF format before being attached below to meet the file size limit. For best results please upload one document at a time.

Attachment: Attach Appendix K – Department of Public Services SWPPP/PIPP, Appendix H - P2GH General Procedures SOP, Appendix H - Street Maintenance and Winter Operations SOP Comment:

#### **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.

Appendix H - P2GH General Procedures SOP, Table 1.

Facilities that may have the high potential to discharge pollutants:

Materials Storage and Public Works yards

Salt Storage Facilities

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

**Police Stations** 

**Parks** 

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

**Catch Basins** 

Infiltration Basins and trenches

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)

Appendix E - Rouge River Collaborative IDEP, Section D. As-built plans for utilities and developments are maintained by the Village and can be found at Village Hall.

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

Appendix H - P2GH General Procedures SOP, Section C.

#### **Facility-Specific Storm Water Management**

63. Provide the reference to the procedure submitted above for assessing each facility identified in Question 60 for the potential to discharge pollutants to surface waters of the state. The procedure shall include a process for updating and revising the assessment.

A recommended timeframe for updating/revising the assessment is 30 days prior to discharging storm water from a new facility and within 30 days of determining a need to update/revise the facility assessment.

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

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

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

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

Appendix H - P2GH General Procedures SOP, Section B

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

Appendix H - P2GH General Procedures SOP, 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.

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)

Appendix K – Department of Public Services SWPPP/PIPP, Table 1.6.

- 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)

  Appendix K Department of Public Services SWPPP/PIPP, Section 1.9.
- 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)

Appendix K – Department of Public Services SWPPP/PIPP, Section 1.9.

- 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) Appendix K Department of Public Services SWPPP/PIPP, Section 1.9.
- 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.

Appendix H - P2GH General Procedures SOP, Section D.

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

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

Appendix H - P2GH General Procedures SOP, Section 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.

Appendix H - P2GH General Procedures SOP, Section F

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.

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

Appendix H - P2GH General Procedures SOP, Section G

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.

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

Appendix H - P2GH General Procedures SOP, Section H

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

Appendix H - P2GH General Procedures SOP, Section J

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.

Appendix H - P2GH General Procedures SOP, Section K

#### **Municipal Operations and Maintenance Activities**

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

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)

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

Appendix H - P2GH Street Maintenance and Winter Operations SOP. Appendix K – Department of Public Services SWPPP/PIPP, Section 7.0.

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.

Appendix H - P2GH General Procedures SOP, Section I

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.

Appendix H - P2GH General Procedures SOP, Section I

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

Appendix H - P2GH General Procedures SOP, 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. Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b.

Appendix H - P2GH General Procedures SOP, Section H

## **Managing Vegetated Properties**

82. If the applicant's pesticide applicator does not exclusively use ready-to-use products from the original container, provide the reference to the procedure submitted above requiring the applicant's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land. A description of the certified applicator categories is available at the following link. If the applicant only applies ready-to-use products from the original container, enter "Not Applicable." Provide the reference to the procedure submitted above (page and paragraph of attachments): e.g., Attachment A, Section b. Appendix H - P2GH General Procedures SOP, Section L. The Village does not use fertilizers on properties.

#### **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.

Appendix H - P2GH General Procedures SOP, Section N

#### **Employee Training**

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

Appendix H - P2GH General Procedures SOP, Section M. Appendix K - Department of Public Services SWPPP/PIPP, Section 1.13.

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

The following questions address discharges to impaired waters with a United States Environmental Protection Agency (USEPA) approved Total Maximum Daily Load (TMDL) that includes a pollutant load allocation assigned to the applicant's MS4. BMPs shall be implemented to reduce the discharge of the TMDL pollutant from the MS4 to make progress in meeting Water Quality Standards. Applicable TMDLs are TMDLs approved prior to the

applicant being notified of the need to apply for permit reissuance. Applicable TMDLs for the applicant were provided in the application notice letter.

The applicant shall describe the current and proposed BMPs to meet the minimum requirements for the TMDL Implementation Plan, 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 TMDL Implementation Plan during the permit cycle. The following questions represent the minimum requirements for a TMDL Implementation Plan. Please complete the following questions as appropriate. 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.

#### **Total Maximum Daily Load Implementation Plan**

Provide the procedures that describe the current and proposed BMPs to meet the minimum control measure requirements for the TMDL Implementation Plan to the maximum extent practicable as required below. It is recommended that files be separated and then converted to a PDF format before being attached below to meet the file size limit. For best results please upload one document at a time.

Attachment: Appendix I - Collaborative Total Maximum Daily Load Implementation Plan Comment:

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

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

Appendix I - Collaborative TMDL Implementation Plan, Section A

Rouge River Watershed – E. coli Rouge River Watershed – Biota

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.

Appendix I - Collaborative Total Maximum Daily Load Implementation Plan, Section C

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.

Appendix I - Collaborative Total Maximum Daily Load Implementation Plan, Section D

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.

Appendix I - Collaborative Total Maximum Daily Load Implementation Plan, Section E

# Village of Beverly Hills Outfalls

OUTFALL	LONGITUDE	LATITUDE	MATERIAL	TYPE	Receiving Water
1	-83.24474	42.52411	Concrete	Point of Discharge	Rouge River, Main 1-2
2	-83.24600	42.52412	Concrete	Outfall	Rouge River, Main 1-2
8	-83.24492	42.52489	CMP	Outfall	Rouge River, Main 1-2
9	-83.24467	42.52495	CMP	Outfall	Rouge River, Main 1-2
10	-83.24469	42.52494	Constructed Ditch	Outfall	Rouge River, Main 1-2
15	-83.24217	42.52764	RCP	Outfall	Rouge River, Main 1-2
17	-83.24324	42.52789	RCP	Outfall	Rouge River, Main 1-2
25	-83.24488	42.52634	Concrete	Outfall	Rouge River, Main 1-2
35	-83.26294	42.51586	CMP	Outfall	Rouge River, Main 1-2
36	-83.26315	42.51593	CMP	Outfall	Rouge River, Main 1-2
39	-83.26435	42.51617	CMP	Outfall	Rouge River, Main 1-2
40	-83.26443	42.51627	Constructed Ditch	Outfall	Rouge River, Main 1-2
42	-83.26571	42.51625	Concrete	Outfall	Rouge River, Main 1-2
43	-83.26709	42.51719	Concrete	Outfall	Rouge River, Main 1-2
44	-83.26763	42.51732	Constructed Ditch	Outfall	Rouge River, Main 1-2
46	-83.26838	42.51807	CMP	Outfall	Rouge River, Main 1-2
49	-83.26861	42.51874	CMP	Outfall	Rouge River, Main 1-2
51	-83.26825	42.51917	CMP	Outfall	Rouge River, Main 1-2
52	-83.26809	42.51947	CMP	Outfall	Rouge River, Main 1-2
55	-83.26845	42.52036	PVC	Outfall	Rouge River, Main 1-2
60	-83.26756	42.52141	Concrete	Outfall	Rouge River, Main 1-2
61	-83.26773	42.52230	Concrete	Outfall	Rouge River, Main 1-2
64	-83.26715	42.52447	Concrete	Outfall	Rouge River, Main 1-2
65	-83.26714	42.52505	Concrete	Outfall	Rouge River, Main 1-2
66	-83.26738	42.52568	Concrete	Outfall	Rouge River, Main 1-2
75	-83.26793	42.52745	Concrete	Outfall	Rouge River, Main 1-2
76	-83.26832	42.52757	Clay	Outfall	Rouge River, Main 1-2
78	-83.26752	42.52818	Concrete	Outfall	Rouge River, Main 1-2
81	-83.26742	42.52836	Concrete	Outfall	Rouge River, Main 1-2
82	-83.26716	42.52841	Concrete	Outfall	Rouge River, Main 1-2
88	-83.26660	42.52903	Concrete	Outfall	Rouge River, Main 1-2
90	-83.26659	42.53046	Constructed Ditch	Outfall	Rouge River, Main 1-2
95	-83.26885	42.52624	RCP	Outfall	Rouge River, Main 1-2
105	-83.25238	42.51842	Concrete	Outfall	Rouge River, Main 1-2
108	-83.25199	42.51967	CMP	Outfall	Rouge River, Main 1-2
110	-83.25135	42.51973	Clay	Outfall	Rouge River, Main 1-2
115	-83.25045	42.52055	Natural	Outfall	Rouge River, Main 1-2
117	-83.25131	42.52109	Natural	Outfall	Rouge River, Main 1-2
120	-83.24976	42.52200	Natural	Outfall	Rouge River, Main 1-2
124	-83.24774	42.52169	Concrete	Outfall	Rouge River, Main 1-2
129	-83.26446	42.51683	CMP	Outfall	Rouge River, Main 1-2
131	-83.26418	42.51806	Clay	Outfall	Rouge River, Main 1-2
133	-83.26804	42.50885	Concrete	Outfall	Rouge River, Main 1-2
135	-83.26238	42.51008	Constructed Ditch	Outfall	Rouge River, Main 1-2
136	-83.26215	42.51007	CMP	Outfall	Rouge River, Main 1-2
137	-83.26104	42.51117	Concrete	Outfall	Rouge River, Main 1-2
138	-83.26206	42.51195	HDPE	Outfall	Rouge River, Main 1-2
139	-83.26188	42.51218	Concrete	Outfall	Rouge River, Main 1-2
143	-83.26001	42.51354	Constructed Ditch	Outfall	Rouge River, Main 1-2
145	-83.25678	42.51552	Concrete	Outfall	Rouge River, Main 1-2
146	-83.25736	42.51637	Concrete	Outfall	Rouge River, Main 1-2

# Village of Beverly Hills Outfalls

OUTFALL	LONGITUDE	LATITUDE	MATERIAL	TYPE	Receiving Water
148	-83.25366	42.51776	Concrete	Outfall	Rouge River, Main 1-2
149	-83.25290	42.51964	Natural	Outfall	Rouge River, Main 1-2
150	-83.25265	42.51951	Clay	Outfall	Rouge River, Main 1-2
151	-83.26323	45.51590	CMP	Outfall	Rouge River, Main 1-2
152	-83.26821	45.52050	CMP	Outfall	Rouge River, Main 1-2

# Spill Notification & Complaint Reporting Form Illicit Discharge Elimination Program Village of Beverly Hills, Oakland County

<del></del>	Phone #:					
Offending Party (if known)						
c.):						
	7					
Date of Observation:  Investigating Agency:  Location of Discharge:  Initial Investigation  Follow-up Investigation	Actions Taken:  Were photos taken: Yes* No Date Corrected:  * Please attach copies					
Investigation Location:  Observations (odor, color, volume, etc):	If necessary: Agency Referred to: Agency Contact: Method of Communication:  E-mail Letter/memo Phone  Content of Communication:					
	Offending Party (if kn c.):    Site Investigation					

# Spill Notification & Complaint Reporting Form Illicit Discharge Elimination Program Village of Beverly Hills, Oakland County

Compliance Information & Schedule:
Date Violation Was Resolved:

- 1. Take down complaint information.
- 2. Fill out the Spill Notification form for the Illicit Discharge Elimination Reporting System.
- 3. Inform the caller that the problem will be further investigated and thank him/her for calling in.
- 4. If the problems are related to sanitary please contact the Oakland County Water Resources Commission at (248) 858-5248.
- 5. If the problem is related to oil, please phone 911.
- 6. If the Problem is related to a construction site and there is sediment leaving that site, please contact Oakland County Water Resources Commission at (248) 858-5248
- 7. Please fax/email completed form to:
  - (i) Michigan Department of Environmental Quality (MDEQ) Southeast Michigan District Office Industrial and Storm Water Unit Fax #: (586) 753-3751 Phone #: (586) 753-3700

(ii) Hubbell, Roth & Clark, Inc. Environmental Engineering Department Fax #: (248) 338-2592 Phone #: (248) 454-6300

Table 1 – Village of Beverly Hills Ordinances as they relate to IDEP enforcement

Permit Item	Permit Item Description	Corresponding Ordinance/Code
20	Prohibits non-stormwater discharges.	Section 30.07 – Discharge Prohibitions Section 30.08 – Waste Disposal Prohibitions Section 30.09 – Watercourse Protection Section 30.010 – Discharges in Violation of Industrial or Construction Activity NPDES Storm Water Discharge Permit
21	Allows flows from firefighting activities unless they are significant pollution source to waters	Section 30.07 – Discharge Prohibitions
22	Allow flows from various activities unless they are significant pollution source to a MS4	Section 30.07 – Discharge Prohibitions
23	Regulates the contribution of pollutants.	Section 30.07 – Discharge Prohibitions Section 30.08– Waste Disposal Prohibitions Section 30.09 – Watercourse Protection Section 30.10 – Discharges in Violation of Industrial or Construction Activity NPDES Storm Water Discharge Permit
24	Prohibits IDs and direct dumping to the MS4.	Section 30.07 – Discharge Prohibitions Section 30.08 – Waste Disposal Prohibitions Section 30.09 – Watercourse Protection Section 30.10 – Discharges in Violation of Industrial or Construction Activity NPDES Storm Water Discharge Permit Section 30.11 – Monitoring of Discharges
25	Establishes authority to inspect, investigate, and monitor suspected IDs to the MS4.	Section 30.11 – Monitoring of Discharges
26	Requires the elimination of ID and provide the MS4 the authority for enforcement.	Section 30.13 – Monitoring of Discharges Section 30.14 – Notice of Violation Section 30.14 – Requirement to Remediate Section 30.16 – Enforcement, Penalties and Remedies

Based on review of the following City Codes/Ordinances/Regulations: Chapter 30 – Surface Water Drainage

# Michigan Department of Environmental Quality – Water Resources Division

# STORM WATER DISCHARGE PERMIT APPLICATION

Table 2: Public Education Program Best Management Practices (BMPs)

PEP	BMP	BMP	Partner	Target	Key Messages	Delivery	Year	Frequency	Responsible	Measurable Goal
Topic	Identifier	Descriptor	Collaboration	Audience	,	Mechanism		. ,	Party	
A B C D E F G H I	1	Distribute pollution prevention literature on various topics through brochures, educational materials and other media	ARC member communities, counties and cooperative partners	General public	Educating on public connection of MS4 to area waterbodies, public reporting illicit discharge, septic system care and failure, proper disposal of pesticides, herbicides and fertilizers, public responsibility and stewardship in the Rouge River watershed, proper disposal of grass, leaf and animal wastes, promote HHHW including trailer, motor vehicle and chemical waste, GI and LID, cleaning materials and proper car, pavement and power washing.	Brochures, educational materials and electronic media	Ongoing	Current and new items annually	ARC member communities listed in Appendix D, Attachment A	Amount of materials distributed, number of views through electronic media
A B C D E F G H I J	2	Coordinate existing and create new community articles and ad graphics on pollution prevention and watershed restoration and stewardship	ARC member communities, counties and cooperative partners	General public, businesses	Educating on connection of MS4 to area waterbodies, public reporting illicit discharge, septic system care and failure, proper disposal of pesticides, herbicides and fertilizers, public responsibility and stewardship in the Rouge River watershed, proper disposal of grass, leaf and animal wastes, promote HHHW including trailer, motor vehicle and chemical waste, GI and LID, cleaning materials and proper car, pavement and power washing and educate commercial, industrial and educational institutional entities about pollution prevention.	Articles and ad graphics	Ongoing	Current items annually; five new articles and/or ad graphics during the permit cycle	ARC member communities listed in Appendix D, Attachment A	List of articles/ad graphics distributed, number of views on websites/social media
A B C	3	Provide static displays and posters on pollution	ARC member communities, counties and	General public	Educating on connection of MS4 to area waterbodies, public reporting illicit	Static displays and posters	Current displays – ongoing;	Current displays annually; up to 4 new	ARC member communities listed in	Date and title of events static displays used at, number of posters distributed annually and
ע		Politilori			discharge, septic system care		new	IO 4 HEW		ulatilibuted affilially affu

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PEP Topic	BMP Identifier	BMP Descriptor	Partner Collaboration	Target Audience	Key Messages	Delivery Mechanism	Year	Frequency	Responsible Party	Measurable Goal
E F G H I		prevention and watershed restoration and stewardship	cooperative partners		and failure, proper disposal of pesticides, herbicides and fertilizers, public responsibility and stewardship in the Rouge River watershed, proper disposal of grass, leaf and animal wastes, promote HHHW including trailer, motor vehicle and chemical waste, GI and LID, cleaning materials and proper car, pavement and power washing.		posters in 2016 and new displays during the permit cycle	posters in 2016 and then annually; new static displays annually upon completion	Appendix D, Attachment A	where posters were displayed
A B C E G J	4	Promote environmental hotlines to educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4	ARC member communities, Wayne County, Oakland County, Washtenaw County, State of Michigan	General public, municipal employees and businesses	Educating on connection of MS4 to area waterbodies, public reporting illicit discharge, public responsibility and stewardship in the Rouge River watershed, proper disposal of pesticides, herbicides and fertilizers, promote HHHW including trailer, motor vehicle and chemical waste, educate commercial, industrial and educational institutional entities about pollution prevention.	Websites, social media, brochures, electronic media, at events and trainings	Ongoing	Annually	ARC member communities listed in Appendix D, Attachment A	Number of materials distributed and number of views on website/social media
A B C D E F G H	5	Development of "homeowners" materials to promote the importance of pollution prevention and watershed restoration and stewardship	ARC member communities, counties and cooperative partners	General public	Educating on connection of MS4 to area waterbodies, public reporting illicit discharge, septic system care and failure, proper disposal of pesticides, herbicides and fertilizers, public responsibility and stewardship in the Rouge River watershed, proper disposal of grass, leaf and animal wastes, promote HHHW including trailer, motor vehicle and chemical waste, GI and LID, and cleaning materials and proper car, pavement and power washing	Brochure	During the permit cycle	Annually	ARC member communities listed in Appendix D, Attachment A	Number of materials distributed
A B C D E F G H	6	Develop and promote educational workshops and presentations	ARC member communities, Friends of the Rouge and counties and cooperative partners	General public, businesses	Educating on connection of MS4 to area waterbodies, public reporting illicit discharge, septic system care and failure, proper disposal of pesticides, herbicides and fertilizers, public responsibility and stewardship in the Rouge River watershed, proper	Workshops and presentations	Ongoing	6 during the permit cycle	ARC member communities listed in Appendix D, Attachment A	Sign-in sheets and topics from workshops/presentations and number of materials distributed

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PEP Topic	BMP Identifier	BMP Descriptor	Partner Collaboration	Target Audience	Key Messages	Delivery Mechanism	Year	Frequency	Responsible Party	Measurable Goal
J					disposal of grass, leaf and animal wastes, promote HHHW including trailer, motor vehicle and chemical waste, GI and LID, cleaning materials and proper car, pavement and power washing and educate commercial, industrial and educational institutional entities about pollution prevention.					
A B C D E F G H L J	7	Promote and support volunteer activities	ARC member communities, Wayne County, Oakland County, Washtenaw County, Friends of the Rouge, Cranbrook Institute of Science, University of Michigan - Dearborn	General public, businesses and schools	Promoting the importance of volunteer activities in the Rouge River Watershed such as River Day, Rouge Rescue, workdays, water festivals and green schools programs will encourage public responsibility and stewardship in the Rouge River.	Website/social media, materials distributed and presentations and workdays	Ongoing	Promotion of activities will be annually and up to 4 workdays may be hosted during the permit cycle	ARC members listed in Appendix D, Attachment A	Number of views on website/social media, number of volunteers attending various events and survey results from various events
A B C I J	8	Promotion and support volunteer monitoring activities within the Rouge River Watershed	ARC member communities, Wayne County, Oakland County, Washtenaw County, Friends of the Rouge	General public and businesses	Promote the importance of pollution prevention and watershed restoration and stewardship through volunteer monitoring. This monitoring may include general macroinvertebrates, stoneflies, and frogs and toads and/or fish. Volunteer monitoring will provide education, build stewardship and provided valuable data for the protection and restoration of the Rouge River.	Website/social media, materials distributed and presentations	Ongoing	Minimum of once during the permit cycle with 1 Winter Stonefly Search and 1 Spring Bug Hunt or other like programs, 1 Fall Bug Hunt and 2 other volunteer monitoring training exercises and/or workshops	ARC members listed in Appendix D, Attachment A	Number of public and businesses attending monitoring events and survey results from various events

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PEP	ВМР	ВМР	Partner	Target	Key Messages	Delivery	Year	Frequency	Responsible	Measurable Goal
Topic	Identifier	Descriptor	Collaboration	Audience	_	Mechanism			Party	
A B F I	O	Rouge River Watershed signage	ARC member communities, Wayne County, Oakland County, and Washtenaw County	General public	River/Road Crossing signs, Don't Feed the Geese/Waterfowl signs, and Grow Zone signs and disposal practices of animal waste or other pollution prevention topic. This activity helps to educate and increase public awareness about the interconnectedness of the watershed and the storm sewer system.	Signs and sticker	Ongoing and one new sign and/or bumper sticker during the permit cycle	Annually	ARC members listed in Appendix D, Attachment A	Documentation of current signage, maintenance required, and future signage placement and the number of new signs/stickers distributed
A B C D E F G H L J	10	Continued participation in regional partnership activities	ARC member communities, Wayne County, Oakland County, Washtenaw County, SEMCOG, and various other organizations as opportunities arise	Organizations, businesses and governmental agencies	To build partnerships with organizations like the Alliance of Downriver Watersheds, SEMCOG, Great Lakes Commission and other regional partners to coordinate storm water permit related public education and other storm water related initiatives.	Participate and collaborate with regional partners	Ongoing	Annually	ARC members listed in Appendix D, Attachment A	Meeting dates, summaries of activities and partner annual reports

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