

St. Clair County's Storm Water Permit Application Attachment

SECTION IV REGULATED AREA

A few maps of the urbanized area within St. Clair County (SCC), as defined by the 2010 census, are provided as **Attachment A**. They include the following:

- SCC Drain Office's (DO) Municipal Separate Storm Sewer System's (MS4) discharge points,
- SCC Road Commission's (RC) MS4 discharge points,
- SCC's facilities/ properties, and
- SCC's nested jurisdictions' facilities/ properties

The direct link to the urbanized area that the county application is applicable to is the following:

http://www.michigan.gov/documents/deq/wb-stormwater-MS4-PortHuron_248489_7.pdf

Please see **Attachment A** for the provided urbanized area map.

SECTION V OUTFALLS AND POINTS OF DISCHARGE

Identification numbers for discharge points/ outfalls, their receiving waters, and their latitude and longitude are provided as **Attachment B**. These include discharge points/ outfalls for St. Clair County and its nested jurisdiction's Municipal Separate Storm Sewer System (MS4) within the urbanized area as defined by the 2010 census:

- St. Clair County
 - SCC Drain Office's (DO),
 - SCC Road Commission's (RC),
 - SCC's facilities/ properties, and
- SCC's nested jurisdictions
 - Algonac Community School District (ACSD)
 - East China School District (ECSD)
 - Marysville Public Schools District (MPSD)
 - Port Huron Area School District (PHASD)
 - St. Clair County Regional Education Service Agency (RESA)
 - St. Clair County Community College (SC4)

SECTION VI NESTED JURISDICTIONS AND GENERAL DESCRIPTIONS

See Table 2 starting on page 14 for a full list of all properties owned/operated by each nested jurisdiction.

SECTION VII STORMWATER MANAGEMENT PROGRAM

QUESTION 1) ENFORCEMENT RESPONSE PROCEDURE (ERP)

St. Clair County's Storm Water Permit Application Attachment

The following programs have ERPs that apply to this permit application's requirements:

- A) Illicit Discharge Elimination Program
- B) Post Construction Program

A) ILLICIT DISCHARGE ELIMINATION PROGRAM ERPs:

St. Clair County:

- HD: The SCCHD's Environmental Health (EH) Code: SCC's resolution 02-30 was adopted November 2002 which provides an enforcement mechanism for the EH code. Please refer to the attached Environmental Health Code for St. Clair County within **Attachment F**.
 - The HD shall serve a violation notice to the responsible person who has violated the EH code. The violation notice shall describe the violation, order the correction or abatement of the violation, and state that failure to correct or abate the violation in the prescribed manner shall result in the issuance of a municipal civil infraction citation to appear in court.
 - The general procedures EH uses are to issue the violation notice with a requirement to correct the problem within 90 days. In 45 days, a reminder letter is issued, and at 90 days a municipal civil infraction citation is issued.
- RC: The RC's Policy # 99, Illicit Discharge Elimination Policy (copy provided as part of the IDEP plan)
 - The RC refers all sewage related complaints/ violations found in their MS4 to the HD for correction and enforcement under the EH code. Complaints are referred to the HD via telephone or in person at which time the HD staff who receives the complaint enters it into the HD's complaint log for follow-up.
 - For all other non-sewage related complaints/ violations, the RC's procedures are as follows:
 - 1) All non-sewage related complaints/ violations are received and entered into an excel spread sheet.
 - 2) RC staff confirms the suspected illicit discharge.
 - 3) If the illicit discharge is confirmed, the RC will send a letter notifying the landowner of the discharge, requirement to correct it within 90 days of the letter's date, and the correction and enforcement procedures that could be used if the illicit discharge is uncorrected after 90 days.
 - 4) At 45 days from the issuance of the first notification, a reminder letter is sent.
 - 5) At 90 days, a final letter is sent notifying the homeowner that 90 days have expired and that the RC will either correct the illicit discharge and bill the homeowner or refer it to the EGLE for enforcement.
- DO: The DO's Drain Rules and the Drain Code
 - The DO refers all sewage related complaints/ violations found in their MS4 to the HD for correction and enforcement under the EH code. Complaints are referred to the HD via telephone or in person at which time the HD staff who receives the complaint enters it into the HD's complaint log for follow-up.
 - For all other non-sewage related complaints/ violations, the DO's procedures are as follows:
 - 1) All non-sewage related violations are entered into the Drain Inquiry Logbook.
 - 2) DO staff confirm the suspected illicit discharge.

St. Clair County's Storm Water Permit Application Attachment

- 3) If the illicit discharge is confirmed, the DO will call, visit or send the homeowner a letter notifying he/she of the discharge, requirement to correct it within 5 days, and the correction and enforcement procedures that could be used if the illicit discharge is uncorrected after 5 days.
- 4) If the illicit discharge is not corrected, or there is not significant progress towards correction, within 5 days, the Drain Commissioner will notify the homeowner that he will correct the problem and assess the costs of correction back to the homeowner.

Tracking violations of each agency's illicit discharge elimination regulatory mechanisms are performed by each respective agency by use of reporting programs, spreadsheets, log books, and/or GIS programs. Each agency's tracking mechanism includes the following information: name, date, location of violation (address, cross streets, etc.), business/agency/organization (as appropriate), description of violation, description of enforcement response, schedule for returning to compliance, and date the violation was resolved.

Nested Jurisdictions

SCC's nested jurisdictions have IDEP policies in place. The nested jurisdictions are in control of all the drainage from their own properties and therefore do not have to enforce their policy on anyone but themselves. These policies provide support for implementing an Illicit Discharge Elimination Program on their own properties along with the understanding of performing regular inspections of their storm water discharge points and correcting any pollution sources that may be found discharging their properties. An example of the policy is provided in **Attachment F**.

B) POST CONSTRUCTION REGULATORY MECHANISM ERPs:

St. Clair County

Please refer to the St. Clair County Enforcement Response Procedure document within **Attachment F**. Additionally, when the permit is issued the St. Clair County Drain office will make the final changes to the wording of the Rules of the St. Clair County Drain Commissioner where deemed necessary.

QUESTIONS 2), 3) PUBLIC PARTICIPATION PROGRAM (PPP)

SCC, its nested jurisdictions, and the local municipalities that are also permittees in the Northeastern Watersheds Advisory Group (NEWAG) will be working collaboratively to implement the activities included in the PPP plan. This plan has been attached as **Attachment C**.

QUESTIONS 4) – 6) PUBLIC EDUCATION PROGRAM (PEP)

SCC, its nested jurisdictions, and the local municipalities that are also permittees in the Northeastern Watersheds Advisory Group (NEWAG) will be working collaboratively to implement the activities included in the PEP plan. This plan has been attached as **Attachment D**.

St. Clair County's Storm Water Permit Application Attachment

QUESTION 7) Location of MS4 Maps

Maps for SCC and its nested jurisdictions' MS4s have been included in SCC's NEW IDEP plan. These maps provide the location of each facility, its storm water structural controls, the MS4 point(s) of discharge(s)/ outfall(s), and their receiving waters. The location of detailed design maps and/or blueprints for SCC and its nested jurisdictions' facilities and MS4s within the urbanized area, as defined by the 2010 census, are indicated below:

TABLE 1 – LOCATION OF MS4 MAPS	
Facility and/or Jurisdiction	Location of blueprints/ design maps
SCC Drain Office	SCC Drain Office, 21 Airport Drive, St. Clair – maps are located throughout the office
SCC Road Commission	SCC Road Commission, 21 Airport Drive, St. Clair - Engineering Department
SCC Fort Gratiot County Park	SCC Parks and Recreation Commission's Main Office, 200 Grand River Ave, Port Huron
SCC Fort Gratiot Light Station	
SCC Library	Building and Operations Department Office, 200 Grand River Ave. Port Huron
SCC Courthouse	
SCC Administrative Offices	
SCC Health Department	
SCC Animal Shelter	
SCC Intervention Center/ Sheriff's Office and Day Treatment/Night Watch	Building and Operations Department Office at the Intervention Center at 1170 Michigan Road, Port Huron Twp.
SCCRC Marine City Warehouse	SCC Road Commission, 21 Airport Drive, St. Clair - Engineering Department
SCC Department of Public Works Algonac Wastewater Treatment Plant	SCC Road Commission, 21 Airport Drive, St. Clair - Green file cabinet across from the RC Director's Office
ACSD	"Blueprint Room", Algonac Operations Department, 5202 Taft Road, Algonac
ECSD	Operations Department, 1585 Meisner Road, East China Township,
MPSD	Facilities Office, Marysville High School, 1325 Michigan Ave., Marysville, MI
PHASD	Director's Office. Transportation and Maintenance Facility, 4035 Dove Rd., Port Huron
RESA	Maintenance Building, RESA Main Campus, 499 Range Rd., Marysville, MI
SC4	Director's Office, Physical Plant Warehouse, 323 Erie Street, Port Huron

QUESTIONS 8) – 19) ILLICIT DISCHARGE ELIMINATION PROGRAM (IDEP)

SCC will be working collaboratively with its nested jurisdictions and the local municipality permittees of the Northeastern Watersheds (NEW) to comply with the IDEP requirements of this permit application. The City of Port Huron is the only local municipal permittee in the NEW that is not

St. Clair County's Storm Water Permit Application Attachment

working collaboratively with SCC as part of the NEW's collaborative IDEP plan. The submission of this plan by each permittee signifies that all permittees and partners listed in this plan are in agreement with this interagency agreement and nullifies the need for separate agreements between each. This IDEP Plan is included in **Attachment E**.

QUESTIONS 20) - 27) ILLICIT DISCHARGE ORDINANCE: IDEP Regulatory Mechanism

St. Clair County:

SCC has the following regulatory mechanisms that regulate the contribution of pollutants into SCC's MS4. Please additionally refer to **Attachment F**.

- HD: SCC's resolution 02-30, adopted November 2002.
- RC: The RC's IDEP Policy #99, adopted in 2010.
- DO: Section 2.6 of the 2004 SCC Drain Commissioner's Drain Rules which refers to section 423 of the Drain Code for the authority to prohibit illicit discharges.

Nested Jurisdictions:

SCC's nested jurisdictions have IDEP policies in place. The nested jurisdictions are in control of all the drainage from their own properties and therefore do not have to enforce their policy on anyone but themselves. These policies provide support for implementing an Illicit Discharge Elimination Program on their own properties along with the understanding of performing regular inspections of their storm water discharge points and correcting any pollution sources that may be found discharging their properties. An example of the policy is provided in **Attachment F**.

CONSTRUCTION STORMWATER RUNOFF PROGRAM QUALIFYING LOCAL SOIL EROSION AND SEDIMENTATION CONTROL PROGRAMS

QUESTION 28) The HD is the Part 91 Agency for SCC. The RC and DO are each an Authorized Public Agency.

QUESTION 29) Procedures for receipt of SESC complaints

St. Clair County

- HD
 1. SESC complaints are recorded by staff on a complaint form which is then given to an EH clerk.
 2. The EH clerk gives the form a complaint #, logs it into a file on the computer, and gives the complaint to the appropriate sanitarian for follow up.
 3. The sanitarian resolves the complaint, writes his/ her actions on the complaint form, and gives it back to the clerk to record in the computer system and close the complaint.

St. Clair County's Storm Water Permit Application Attachment

- RC
 1. The receptionist will provide a caller, who is complaining about SESC on a construction site under the jurisdiction of the HD, the phone number of the Environmental Health Division of the HD to file a complaint.
 2. If the caller is complaining about SESC under the RC's jurisdiction, the receptionist records the complaint, aka the "service request", into a service request form.
 3. The service request form is forwarded to the appropriate district foreman for investigation and resolution.
 4. The foreman writes his actions on the service request form and gives the form back to the receptionist for closure of service request and input into the computer.
 5. RC staff perform inspections of their construction sites and file reports as part of their APA requirements on a weekly basis and/or after significant rain events.
- DO:
 1. The DO staff will provide a caller, who is complaining about SESC on a construction site under the jurisdiction of the HD, the phone number of the Environmental Health Division of the HD to file a complaint.
 2. If the DO staff receive a complaint that is applicable to their own project(s), the complaint is logged in the DO's "Drain Inquiry Report Log". The Drain Inquiry Log has sections for the following information: a) Complaint #, b) Drain/ Twp., c) Staff Initials, d) Date, e) Caller, f) Problem/ inquiry, g) Status (closed or open).
 3. A DO staff person will evaluate and confirm the SESC complaint through a site visit and communicate corrective actions necessary to pertinent staff managing the contractor working on that job. If necessary, the DO will withhold a certain percentage of payment on a contract if SESC measures are not to satisfaction.
 4. The DO construction manager performs inspections of the DO's construction sites and file reports as part of their APA requirements on a weekly basis and/or after significant rain events.

Nested Jurisdictions:

The Nested Jurisdictions record all complaints and follow up actions via a work order system. Each work order has a number associated with it, and background explanation as to what and who generated the work order. The maintenance and operation supervisors check the work order systems on a regular basis to ensure each work order is closed on a timely basis. Once each work order is closed it is filed for record keeping. This is the mechanism that will be used for any SESC complaints the school may receive on future land disturbance activities.

QUESTION 30) Procedure for notification to EGLE of soil, sediment or other pollutants from construction sites
St. Clair County and its nested jurisdictions will notify the EGLE when soil, sediment, or other pollutants are discharged to SCC's MS4 or the nested jurisdiction's MS4s from a construction activity when any of the agencies or nested jurisdictions feel that Part 91 is not being enforced properly and/or when hazardous pollutants are in significant enough quantities to warrant calling the EGLE.

QUESTIONS 31), 32) Site Plan Review Procedures re: SESC Permit and Permit by Rule's Notification of Coverage

St. Clair County's Storm Water Permit Application Attachment

St. Clair County

- HD

The HD notifies potential SESC permit applicants of the requirement to provide a Notification of Coverage to the EGLE for all construction sites > 5 acres via their information packet titled, "Information Required to Process a SESC Permit:" Within this packet, there is a section labeled, "Commercial Financial requirements and Responsibilities". In this section the following language is included: "Please be aware, once a commercial development ≥ 5 acres obtains a SESC permit from the SCC Health Department, they are also required to submit a Notice of Coverage (NOC) to the EGLE as required by the Permit by Rule regulations." See **Attachment G**.

- RC and DO

The RC and the DO do not require evidence of a SESC permit for regulated construction sites or provide notice to land owners or recorded easement owners of the State of Michigan's Permit by Rule regulation. Both of these departments feel that these permit application requirements are more appropriate for the County Enforcing Agency for Part 91 and the local municipal permittees because of the timing of plan review by these county agencies.

Nested Jurisdictions

Nested jurisdictions all have standard procedures to acquire a SESC permit from the HD as appropriate. The local municipality will not issue a building permit until evidence of a SESC permit from the HD is evident.

POST-CONSTRUCTION STORMWATER RUNOFF PROGRAM

QUESTION 33) Ordinance or Other Regulatory Mechanism (NOTE: this is Question 32 in the Newer MS4 Application (10-2014))

Yes, the Rules of the St. Clair County Drain Commissioner are in effect to address post-construction stormwater runoff from new development and redevelopment projects, including preventing or minimizing water quality impacts. Each site development or re-development is looked at in the site review process to determine how to implement the SCC DO Rules.

QUESTION 34) Ordinance or Other Regulatory Mechanism (NOTE: this is Question 33 in the Newer MS4 Application (10-2014))

Pages 5 & 15; Section 2.0 & 3.1d

QUESTION 35) Federal Facilities (NOTE: this is Question 34 in the Newer MS4 Application (10-2014))

No, skip to Question 37.

QUESTIONS 37)- 39) Water Quality Treatment Performance Standard (NOTE: these are Questions 36-38 in the Newer MS4 Application (10-2014))

St. Clair County's Storm Water Permit Application Attachment

SCCDO does not use specific rainfall data the design criteria on Pgs. 22, 23, 25 (Rational Method); Section 4.8, A. states that the maximum release rate shall be 0.15 cfs / acre or a discharge rate approved by the SCC Drain Commissioner. NOTE: this is a restrictive rate that is less than runoff from a meadow in this county. For example, using the Rational Method (10-year design storm) on one acre of meadow/shrub, with a storm intensity of 3.8 inches/hr.; 1 acre; C = 0.2 (typical in this area for flat slope and heavy soils) $Q = CIA = 0.2 \times 3.8 \times 1 = 0.76$ cfs per acre. St. Clair County restricts to 0.15 cfs/ acre and typically does not allow more. This is a method that is utilized in many areas of the state. It is a simpler method of calculating so design engineers can complete the calculations. As a reviewing engineer, this is an accepted methodology that is easier to explain to design engineers and architects that are submitting site stormwater management designs.

When the permit is issued the St. Clair County Drain office will make the final changes to the wording of the Rules of the St. Clair County Drain Commissioner to reflect that a minimum volume of 900 cubic feet per acre will be required for directly connected disturbed pervious areas. The copy of the Rules will be provided after the permit is issued.

QUESTIONS 40)- 41) Channel Protection Performance Standard (NOTE: these are Questions 39-40 in the Newer MS4 Application (10-2014))

When the permit is issued the St. Clair County Drain office will make the final changes to the wording of the Rules of the St. Clair County Drain Commissioner to reflect that a minimum volume of 900 cubic feet per acre will be required for directly connected disturbed pervious areas. The copy of the Rules will be provided after the permit is issued. The rules of St. Clair County also have conditions in section 4.1 E which state the following:

Stream protection shall be provided for surface water discharges to natural water courses (directly or through pipes or ditches) by retaining onsite the difference in stormwater runoff volume between pre-development and post-development conditions for the 2-year, 24-hour storm (2.26 inches of rain). Stream protection for redevelopments shall be provided through retention of the difference in the 2-year stormwater runoff volume between existing and post-development conditions.

Additionally, St. Clair County County's rules do not allow a discharge rate of more than 0.15 cfs/acre which is significantly more restrictive than the recommendations from the EGLE for water quality. It is felt this restrictive rate, along with detention of the 100-yr design storm is more restrictive and conducive to water quality goals than those proposed by the EGLE.

The Rules of the St. Clair County Drain Commissioner require sites to meet water quality criteria and channel criteria. Please note that on channel criteria, the St. Clair River is exempt as are engineered drains. Discharges to natural surface water streams and rivers in the county must meet channel criteria.

QUESTIONS 42)- 43) Site Specific Requirements (NOTE: these are Questions 41-42 in the Newer MS4 Application (10-2014))

St. Clair County's Storm Water Permit Application Attachment

See Section 2.6 of the current Drain Commissioner's Rules included as **Attachment H**.

Section 4.7 of the Rules of the St. Clair County Drain Commissioner and Section 4.7.1 which deals with Pre-Design Evaluation of Infiltration sites states:

Infiltration structures can present some practical design problems. When planning for an infiltration structure that provides stormwater quality treatment, consideration should be given to soil characteristics, depth to the groundwater table, sensitivity of the region, and runoff water quality. Specifically, infiltration structures must not be used in the following locations:

- *Industrial and commercial areas where solvents and/or petroleum products are loaded, unloaded, stored, or applied or pesticides are loaded, unloaded, or stored.*
- *Areas where hazardous materials are expected to be present in greater than "reportable quantities" as defined by the U.S. Environmental Protection Agency in the Code of Federal Regulations at 40 CFR 302.4.*
- *Areas where infiltration structure use would be inconsistent with an NJDEP-approved remedial action work plan or landfill closure plan.*
- *Areas with high risks for spills of toxic materials such as gas stations and vehicle maintenance facilities.*
- *Areas where industrial stormwater runoff is exposed to "source material." "Source material" means any material(s) or machinery, located at an industrial facility, that is directly or indirectly related to process, manufacturing, or other industrial activities, that could be a source of pollutants in any industrial stormwater discharge to groundwater. Source materials include, but are not limited to raw materials, intermediate products, final products, waste materials, by-products, industrial machinery and fuels, and lubricants, solvents, and detergents that are related to process, manufacturing, or other industrial activities that are exposed to stormwater.*
- *Areas where their installation would create a significant risk for basement seepage or flooding, cause surficial flooding of groundwater, or interfere with the operation of subsurface sewage disposal systems and other subsurface structures. Such adverse impacts must be assessed and avoided by the design engineer.*

The St. Clair County Drain Commissioner will upon issuance of the permit insert a paragraph in this section that will read as follows:

If during a project involving infiltration BMPs the SCCDO becomes aware of an issue with contaminated soils the EGLE will be contacted immediately and the site work will cease until the issue is resolved.

NOTE: St. Clair County as with other areas such as Monroe, Saginaw, and Bay Counties do very few projects involving infiltration BMPs as these areas have heavy clay soils and a clay layer just below the surface which precludes these types of BMPs. So please note, these are an extreme rarity in these regions. This question is more appropriate for Southwestern Michigan.

RC: The RC focuses on regulation of storm water discharge rate. It does not regulate the types of BMPs implemented on private property, the quality of storm water discharge into its system, nor does it check to see if there is previously contaminated land on-site. These regulatory

St. Clair County's Storm Water Permit Application Attachment

functions are relegated to the local municipalities and Drain Office. The RC only has jurisdiction within its Road Right-of-Way (ROW) and only requires that the rate of discharge in post development does not exceed the pre-development rate.

QUESTIONS 44)– 52) Off-Site Mitigation and Payment in Lieu Programs (NOTE: these are Questions 43-51 in the Newer MS4 Application (10-2014))

The RC and DO are not pursuing these options at this time.

QUESTION 53) (NOTE: this is Question 52 in the Newer MS4 Application (10-2014))

No

The Rules of the St. Clair County Drain Commissioner have this standard in place only at the recommendation of the EGLE. This standard is based on RETENTION as stated in the permit. PLEASE note that DETENTION is used the vast majority of the time in St. Clair County. It is felt that the Rules of the St. Clair County Drain Commissioner in the areas where they are utilized for development and the long-established engineering review process sufficiently. The Rules adequately provide for proper judgement in this area and provide enough information for decision making.

In the permit development process, the municipalities and counties cautioned the EGLE about becoming too prescriptive in these areas as the Post Construction Controls developed for many counties and municipalities have been in development in some cases for over 30 years with both flood and pollutant control in mind.

Site Plan Review

QUESTION 54) (NOTE: this is Question 53 in the Newer MS4 Application (10-2014))

When the permit is issued the St. Clair County Drain office will make the final changes to the wording of the Rules of the St. Clair County Drain Commissioner to meet the permit application requirements.

Nested Jurisdictions

The Nested Jurisdictions do not need to adopt post construction stormwater runoff engineering standards that meet the permit application requirements because any new development or redevelopment project they may initiate within the urbanized area will be subject to these permit requirements via site plan review by a regulated municipality and/or the SCC Drain Office and/or Road Commission. Building permits cannot be issued until site plan approval is received. Therefore, the nested jurisdictions do not need a policy to meet the post construction requirements within the urbanized area as defined by the 2010 census.

St. Clair County's Storm Water Permit Application Attachment

QUESTION 55) Procedures for site plan review process *(NOTE: this is Question 54 in the Newer MS4 Application (10-2014))*

- RC: The following checklists are used by the RC during their site plan review process and are included in their Procedures for Plat Street Development, pages 41 – 45. These have been provided in **Attachment I**. The RC's procedure for site plan review is as follows:
 - 1) Preliminary Plan Review Checklist
 - 2) Construction Plan Review Checklist
 - 3) Subdivision Acceptance Review Checklist
- DO: The Site Plan Review process is outlined in Section 2.6 of current Drain Commissioner's Rules. Checklists used by the DO are provided in **Attachment I**.

QUESTION 56) *(NOTE: this is Question 55 in the Newer MS4 Application (10-2014))*

Reference in site plan review and approval procedure for approving performance standards and long-term operation and maintenance of BMPs.

- RC: The RC's procedures for acquiring a maintenance agreement are provided in their Procedures for Plat Street Development, Section VII, Section G titled, "Maintenance Bond". This has been included in **Attachment J**.
- DO: The DO's procedures for acquiring a maintenance agreement are provided in Section 3.2 of the Drain Commissioner's Rules. This has been included in **Attachment J**.

QUESTIONS 57), 58) Long Term Operation and Maintenance of BMPs *(NOTE: these are Questions 56-57 in the Newer MS4 Application (10-2014))*

The Road Commission and Drain Office do not have the authority to enter private property for inspection of BMPs. This would be more appropriate for the local municipalities who have code enforcement and authority to enter private properties for inspections. The Road Commission and Drain Office do not have authority to enter private property outside the boundaries of their ROW easements. NO county has the right to enter private commercial or industrial sites unless there is an issue which has an effect on public health or safety.

The Rules of the St. Clair County Drain Commissioner has a section for subdivision and condominium developments which cover the residential and industrial areas developed under the Subdivision Control Act of 288 of Public Acts of 1967 (Land Division Act) sets up the necessary legal framework for a Drain Commissioner to enter into a maintenance agreement with a homeowner's / condo association. Also, Public Act 40 of 1956 (Drain Code) has provisions for setting up this type of agreement if these sites discharge to a county drain.

The Drain Office will obtain a maintenance agreement during a stormwater review process which will be signed by the owner and states the owner will maintain the site and provide permission to enter the site if necessary as it relates to storm water issues.

St. Clair County's Storm Water Permit Application Attachment

Please see the attached example of the type of agreement that is to be used in St. Clair County for site development. This agreement is used on private commercial sites in other areas in the state and has not been challenged and compliance is achieved with just a letter to the owner. Please note that this also includes a spill plan as an action item and education for the property owner. This is not addressed in typical maintenance agreements.

QUESTION 59) *(NOTE: this is Question 58 in the Newer MS4 Application (10-2014))*

RC and DO: The RC and DO do not have the authority to enter private property for inspection of BMPs. This would be more appropriate for the local municipalities who have code enforcement and authority to enter private properties for inspections. The RC and DO do not have authority to enter private property outside the boundaries of their ROW easements. NO county has the right to enter private commercial or industrial sites unless there is an issue which has an effect on public health or safety.

The Drain Office will obtain a maintenance agreement during a stormwater review process which will be signed by the owner and states the owner will maintain the site and provide permission to enter the site if necessary as it relates to storm water issues.

Please see the attached example of the type of agreement that is to be used in St. Clair County for site development. This agreement is used on private commercial sites in other areas in the state and has not been challenged and compliance is achieved with just a letter to the owner. Please note that this also includes a spill plan as an action item and education for the property owner. This is not addressed in typical maintenance agreements.

POLLUTION PREVENTION AND GOOD HOUSEKEEPING PROGRAM

QUESTIONS 60), 62) 63), 64), 70) Table 2 lists the facilities and structural controls that are owned by SCC and/or its nested jurisdictions, which are located in urbanized areas, and have discharges of stormwater to the surface waters of the state and/or discharges to another jurisdiction's MS4.

Facilities that perform maintenance on vehicles and/or provide storage of significant hazardous materials were assessed as having a high to medium potential to discharge pollutants to surface waters of the state. The following facilities are included in this group:

St. Clair County: SCCRC Marine City Warehouse

Nested Jurisdictions: PHASD's Transportation and Maintenance Facility, SC4's Maintenance and Receiving Facility, and ACSD's Transportation and Maintenance Facility.

St. Clair County's Storm Water Permit Application Attachment

For each of the above “high” or “medium” rated facilities, a standard operating procedure (SOP) has been developed identifying the controls put in place to reduce pollutant runoff. These SOPs are in the form of a Stormwater Pollution Prevention Plan (SWPPP) and/or a Pollution Prevention Incident Plan (PIPP) as applicable. These SWPPP/ PIPPs are attached to this application as **Attachment K**.

For facilities that have a low potential for the discharge of pollutants to surface waters of the state, each facility was evaluated for the presence of the following factors:

0. Absence of any factors
1. Presence of potential pollutants stored at the site (pesticides, fertilizers, herbicides, salt, chlorides or hydrocarbons)
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

For each “low potential” facility, best management practices will be performed as applicable to the facility and as listed in Table 2 and prioritized in Questions 71 and 78. Table 2 will be updated annually, as part of annual permit progress reports. The update to Table 2 will include facilities and structural stormwater controls that have been added, removed, or no longer owner or operated by the applicant during the previous year. Priority level assessments will be updated and revised within 90 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by St. Clair County. As facilities and/or structural storm water controls are added or changed, SCC and its nested jurisdictions will implement appropriate pollution prevention and good housekeeping BMPs to the maximum extent practicable until an annual permit progress report is available for the EGLE’s review.

TABLE 2 – ASSESSMENT OF FACILITIES, STRUCTURAL CONTROLS & POTENTIAL DISCHARGES AND BMPS					
#	Facility Name	Estimated # of storm water structural controls	Priority of potential discharge	Presence of Assessment Factors	BMPs to reduce pollutant runoff
St. Clair County					
1	Fort Gratiot County Park	No structural controls/ sheet runoff	Low	4	No fertilizer or herbicide applications
2	Fort Gratiot Light Station				
3	Library & Merchant Street parking lots	3 bioswales, 6 catch basins, 6 inlets	Low	0	catch basin cleaning and annual bioswale and inlet maintenance
4	Courthouse	13 catch basins	Low	0	catch basin cleaning and sweeping

St. Clair County's Storm Water Permit Application Attachment

TABLE 2 – ASSESSMENT OF FACILITIES, STRUCTURAL CONTROLS & POTENTIAL DISCHARGES AND BMPs					
#	Facility Name	Estimated # of storm water structural controls	Priority of potential discharge	Presence of Assessment Factors	BMPs to reduce pollutant runoff
5	Administrative Offices	13 catch basins	Low	0	
6	Health Department	3 catch basins, 1 manhole	Low	0	
7	Jail, Sheriff's Office	13 catch basins, 1 detention basin, 2 bioswales	Low	0	catch basin cleaning, detention basin and bioswale inspection and maintenance inspection and maintenance
8	Day Treatment/Night Watch	2 bioswales	Low	0	Bioswale maintenance
9	Animal Shelter	No structural controls/ sheet runoff	Low	0	Not applicable
10	RC'S Marine City Warehouse	9 catch basins, salt and equipment/ vehicle storage	High	1, 3	SWPPP/ PIPP
11	District Court 72	No structural controls/ sheet runoff	Low	0	None
12	Blue Water River Walk County Park	4 catch basins	Low	4	catch basin cleaning and sweeping
13	Algonac Wastewater Treatment Plant	Permit requirements are waved because facility already has an NPDES permit			
Algonac Community School District					
1	Pte Tremble Elementary	1 complex - 19 catch basins, 1 oil/ water separator, 1 retention basin	Low	0	catch basin cleaning and sweeping
2	Algonac High School		Low	0	
3	Transportation and Maintenance Facility		High	1	SWPPP
4	Algonquin Middle School	1 complex - 10 catch basins	Low	0	catch basin cleaning and sweeping
5	Millside Elementary		Low	0	catch basin cleaning and sweeping
East China School District					
1	St. Clair Middle School	24 catch basins, 2 detention basin	Low	0	catch basin cleaning and detention basin inspection/ maintenance

St. Clair County's Storm Water Permit Application Attachment

TABLE 2 – ASSESSMENT OF FACILITIES, STRUCTURAL CONTROLS & POTENTIAL DISCHARGES AND BMPs					
#	Facility Name	Estimated # of storm water structural controls	Priority of potential discharge	Presence of Assessment Factors	BMPs to reduce pollutant runoff
2	St. Clair High School	42 catch basins, 4 swales			catch basin cleaning and detention basin inspection/ maintenance
3	Pine River Elementary	6 catch basins	Low	0	catch basin cleaning and sweeping
4	Marine City High School, Marine City Middle School, Riverview East high School Complex	56 catch basins, 1 detention basin, 1 swale	Low	0	catch basin cleaning and sweeping, detention basin inspection and maintenance
5	Belle River Elementary	4 catch basins, 2 swales	Low	0	catch basin cleaning and sweeping
6	Council on Aging Service Servicing St. Clair Co. (Formally Washington Life Center)	11 catch basins	Low	0	catch basin cleaning and sweeping
Marysville Public School District					
1	Marysville High School & Middle School	80 catch basins, 1 underground detention basin, 2 swales	Low	0	catch basin cleaning and sweeping as needed, detention basin inspections and cleaning
2	Morton Elementary School	17 catch basins, 3 underground detention basins	Low	0	
3	Washington Elementary School	20 catch basins and 1 detention basin	Low	0	
4	Gardens Elementary School	15 catch basins	Low	0	
5	Marysville Schools Storage Garage	3 catch basins	Low	1	
Port Huron Area School District					
1	Port Huron Maintenance and Transportation Facility (Bus Garage)	4 catch basins	High	1	SWPPP/ PIPP
2	Administration Building	16 catch basins	Low	0	catch basin cleaning and sweeping
3	Port Huron High School	29 catch basins	Low	0	
4	Port Huron Northern High School	16 catch basins	Low	0	

St. Clair County's Storm Water Permit Application Attachment

TABLE 2 – ASSESSMENT OF FACILITIES, STRUCTURAL CONTROLS & POTENTIAL DISCHARGES AND BMPs						
#	Facility Name	Estimated # of storm water structural controls	Priority of potential discharge	Presence of Assessment Factors	BMPs to reduce pollutant runoff	
5	Central Middle School	19 catch basins	Low	0		
6	Fort Gratiot Middle School	8 catch basins	Low	0		
7	Holland Woods Middle School	8 catch basins	Low	0		
8	Cleveland Elementary School/ Leonard Learning Center	8 catch basins	Low	0		
9	Howard D. Crull Elementary School	5 catch basins	Low	0		
10	McKinley Elementary School		Low	0		
11	Thomas A. Edison Elementary School	9 catch basins	Low	0		
12	Garfield Elementary School	10 catch basins	Low	0		
13	Keewahdin Elementary School	6 catch basins	Low	0		
14	Michigamme Elementary School	1 catch basin	Low	0		
15	Woodrow Wilson Elementary School	8 catch basins	Low	0		
16	Harrison Elementary School	5 catch basins	Low	0		
17	Roosevelt Elementary School	3 catch basins	Low	0		
St. Clair County Regional Education Service Agency (RESA)						
1	SCC Regional Educational Service Agency & Woodland Dev. Center	26 catch basins, 1 detention basin and 3 swales	Low	0		catch basin cleaning and sweeping
2	Virtual Learning Academy	none	Low	0		Sweeping
3	1111 Delaware Ave. Marysville, MI 48040	2 catch basins	Low	0		catch basin cleaning and sweeping
St. Clair County Community College						
1	College Campus Complex	38 catch basins, 9 bioswales, 1 detention basin	Low	0	catch basin cleaning, sweeping, and bioswales and detention basin inspections and maintenance	
	Maintenance and Receiving Facility	3 catch basins	High	1, 4	SWPPP	

St. Clair County's Storm Water Permit Application Attachment

QUESTION 61) Location of Facility Maps

The locations of detailed design maps for the above facilities are already listed under question #7.

FACILITY- SPECIFIC STORM WATER MANAGEMENT

QUESTIONS 65) - 70)

St. Clair County

- RC: The RC has a Storm Water Pollution Prevention Plan (SWPPP) / Pollution Incident Prevention Plan (PIPP) for the Marine City Warehouse. These plans meet the requirements listed in questions 65) – 70) of the permit application.

Nested Jurisdictions

- PHASD: The PHASD has a SWPPP/ PIPP for its Transportation and Maintenance Facility
- ACSD: The ACSD has a SWPPP for its transportation and maintenance facility.
- SC4: The SC4 has a SWPPP for its Maintenance and Receiving Facility.

These plans meet the requirements listed in questions 65) – 70) of the permit application.

All the PIPP/ SWPPPs mentioned above have been attached to this application as **ATTACHMENT K**.

STRUCTURAL STORM WATER CONTROL OPERATION AND MAINTENANCE ACTIVITIES

QUESTIONS 71) - 72) Prioritization of catch basins for inspection, maintenance and cleaning. The catch basin inventory will be updated within 90 days following the construction of a catch basin or a change in the priority level.

RC: An inventory of catch basins is available at the Road Commission's Engineering Department located at 21 Airport Drive, St. Clair, MI 48079. A digitized inventory of the catch basins on a countywide scale is not practical considering the St. Clair County Road Commission has thousands of catch basin structures county wide under its jurisdiction that are inspected and maintained by the road commission staff. The RC prioritizes catch basin cleaning based on the volume of traffic normally expected on each type of road. Primary roads have the most traffic so their catch basins are inspected and cleaned (if the sump is over 50% full) once per year. Local roads have a much lower volume of traffic so these catch basins are inspected and cleaned (if the sump is over 50% full) out once every two or three years depending on the budget available. An inventory of structural storm water controls on road commission properties has been documented and can be found within ***Table 2-Assessment of Facilities, Structural Controls & Potential Discharges and BMPs and inspection documents for catch basin prioritization/maintenance.***

BOD: The BOD is responsible for cleaning catch basins at all of SCC's building facilities. The catch basins which are the highest priority for cleaning are the Grand River Lot, and the loading docks at the Administration building. These are inspected and cleaned if the sump is over 50%

St. Clair County's Storm Water Permit Application Attachment

full twice a year. The lowest priority catch basins for cleaning are the Department of Human Services side of the Administration Building and the courthouse building and parking lot. These low priority catch basins will be inspected one time every three years. If the sump is 50% full of sediment, the structures will be cleaned. All other catch basins will be inspected and cleaned if the sump is over 50% full once every three years. The BOD is also responsible for cleaning out the sediment forebay at the Day Treatment Night Watch's bioswales and maintaining the rip rap at the Merchant Street bioswales. These bioswales will be cleaned out one time each spring, preferably before heavy spring rains.

DO: None of the detention basins under the DO's jurisdiction are of a higher priority than another. This includes including the jail's detention basin for which the DO will take responsibility for inspection and maintenance. The DO also has responsibility for maintaining the bioswales at the Merchant Street parking lot. These bioswales will be maintained for weeds by the SCCDO once a month, April - October.

For the purposes of prioritizing the DO's catch basin cleaning responsibilities, regulated drains have been divided into four areas (see Table 3). For Table 4, the number of catch basins was estimated for each county drain and each drain was then evaluated based on the assessment factors listed below. Drains without catch basins were not included in Table 4. Drains with catch basins were then further prioritized, based on the assessment factors, into the top three drains for catch basin cleaning. For the first four years of the permit cycle, one area will be addressed for catch basin cleaning and only the top three drains in each area will be cleaned. The other drains in that area will be inspected for cleaning needs. The last year (5th year) of the permit cycle, any catch basins that were evaluated and need to be cleaned will be cleaned by the end of that year.

Nested Jurisdictions

The nested jurisdictions did not see any need for prioritizing catch basins for cleaning. Representatives felt that they were all very similar in that they have low potential for pollutant accumulation. They also said that cleaning them all at once is much more economical than trying to inspect/ clean some and not others on different years. The representatives will inspect all structures every three years at a minimum and clean if the sump is over 50% full for all catch basins. If they find the need to clean them more often than they will report these activities in their permit progress reports.

QUESTIONS 73) and 74) Procedures for inspecting/ cleaning/ maintaining catch basins and dewatering/ disposal of materials SCC and its nested jurisdictions (except ACSO) currently contract their catch basin cleaning, and the dewatering and disposal of materials extracted from this activity. As part of these contracts there is always language that requires contractors to comply with all local, state and federal laws. Until such laws change, the county and the nested jurisdictions will not be liable for dictating the methods contractors use; they will rely on the contractors to follow applicable laws and regulations. SCC and the nested jurisdictions will include the information provided from EGLE <https://www.michigan.gov/-/media/Project/Websites/egle/Documents/Programs/WRD/Storm-Water-Municipal/catchbasin-cleaning-guidance.pdf?rev=187c61f0d424443b86a6401fdf9c48ab> to contractors performing catch basin cleaning and recommend that they follow these procedures. This is as long as the EGLE continues to make such guidance available and does not require activities beyond that currently required

St. Clair County's Storm Water Permit Application Attachment

by state laws and regulations. ACSD will follow the procedures used in the EGLE guidance document aforementioned when they clean their catch basins and dispose of materials. This catch basin guidance is attached as **Attachment L**.

QUESTION 75) Procedure for inspecting and maintaining structural storm water controls (other than catch basins)

The SCCDO and nested jurisdictions will use the Alliance for Rouge Communities' "Detention Pond Inspection and Maintenance Record" for inspecting and maintaining their above ground detention ponds/ basins procedures.

<http://www.allianceofrougecommunities.com/PDFs/PI/detention%20pond%20manual%2081-2%20x%2011.pdf> The checklist for inspections is provided on pgs. 17-18 and has been provided as **Attachment M**.

For MPSD's underground detention basins, the ARC's inspection and maintenance record will be used to the extent it is applicable. MPSD will follow inspection and maintenance recommendations for underground detention basins as it is provided by the EGLE and/or develop an inspection and maintenance procedure within the first year of SCC's permit. The "Drainage System Maintenance" Standard Operating Procedure will be additionally utilized for inspecting and maintaining their underground detention basins.

The "Drainage System Maintenance" Standard Operating Procedure will be utilized for inspecting and maintaining bioswales and all other structural storm water controls other than catch basins (i.e. oil/water separators, vegetated swales, etc.) a minimum of annually. This procedure requires that all controls be maintained to reduce to the maximum extent practicable the contribution of pollutants to stormwater. This maintenance standard operation procedure shall be reviewed and updated/ revised following the implementation of a new structural storm water control. Please refer to the attached Standard Operating Procedure.

QUESTION 76) Procedure for new applicant owned/ operated facilities/ new structural storm water controls to be designed in accordance with post construction procedures.

When SCC and its nested jurisdictions design new facilities or structural storm water controls that are part of a development or redevelopment one (1) acre or larger and within the urbanized area, these design plans will be reviewed by the local municipality. This local municipality must ensure all new facilities adhere to the post construction requirements of this Permit Application before issuing a building permit. Therefore, a separate policy for ensuring this requirement is met by SCC and its nested jurisdictions is not needed.

MUNICIPAL OPERATIONS AND MAINTENANCE ACTIVITIES

QUESTION 77) Assessment of Operation and Maintenance (O&M) Activities

SCC and its nested jurisdictions do not apply sand.

St. Clair County's Storm Water Permit Application Attachment

The RC aims to conduct maintenance activities within County right of way (ROW) as efficiently as possible with the safety of the motoring public as its primary objective. When EGLE has guidance for the pollution prevention activities it would like to see incorporated into these standards, the RC will be open to incorporating them if they are economically feasible and do not threaten the safety of the motoring public. A list of the activities for which the RC has work activity descriptions is provided as **Attachment N**.

TABLE 3 – O&M ACTIVITIES – ASSESSMENT AND BMPs			
<i>Municipal Operation and Maintenance Activity</i>	<i>Pollutants that could be discharged</i>	<i>Pollution Potential (high, med, low)</i>	<i>BMPs to reduce pollutant runoff</i>
Road, parking lot and sidewalk maintenance (pothole, sidewalk, and curb/gutter repair)	Debris and pollutants from the road, sediment, left over materials	Low	<p><u>RC</u>: Self-implement part 91 BMPs for SESC using authority as an Authorized Public Agency.</p> <p>SCCRC has adopted the following procedure:</p> <ul style="list-style-type: none"> • Construct, Operate, and Maintain Streets, Roads, Highways, and Parking Lots <p><u>Nested Jurisdictions</u>: Large parking lot resurfacing jobs are contracted out. Small pothole repair is done by staff and excess material is returned to supplier. Contracts require contractors to follow all local, state and federal laws. If guidance material is provided, the RC will include provide this information to contractors as guidance materials.</p>
Bridge Maintenance			<p><u>RC</u>: Self-implement part 91 BMPs for SESC using authority as an Authorized Public Agency.</p>
Right-of-Way Maintenance	sediment		<p>The RC and DO are both APAs and implement part 91 requirements for SESC on their own projects.</p> <p>RC: Self-implement part 91 BMPs for SESC using authority as an Authorized Public Agency.</p> <p>Vegetation management BMPs are implemented as needed to minimize discharge of pollutants to storm sewers and public waterways.</p> <p>Fertilizers are not used on County road ROWs.</p>

St. Clair County's Storm Water Permit Application Attachment

			<p>SCCRC has adopted the following procedures:</p> <ul style="list-style-type: none"> • Ditch Maintenance • Managing vegetation and fertilizing in County Road ROW Property
Unpaved road maintenance	Sediment		<p><u>RC</u>: Chloride for dust control is applied upon local municipality's requests. Chloride is applied at a controlled rate. The application frequency is based on weather conditions and varies annually.</p> <p><u>Nested Jurisdictions</u>: Very few unpaved lots and those in existence are compacted and do not require dust control</p>
Cold weather operations - plowing	Debris and pollutants from the road, sediment		<p><u>BOD</u>: Contracts plowing. Will include EGLE guidance in contract information packets if provided.</p> <p><u>RC</u>: Plowing is for public safety. Salt/sand trucks and spreaders are ground controlled and calibrated to ensure accurate application; salt is stored in a dedicated building with the door kept closed; salt and sand are mixed on a concrete pad to minimize runoff.</p> <p>SCCRC has adopted the following procedure:</p> <ul style="list-style-type: none"> • Prevent Salt and Sand from entering Receiving Streams <p><u>Nested Jurisdictions</u>: Plowing is done as to minimize scapping of the pavement.</p>
Cold weather operations - application of deicing agents	Chloride and salt	High	<p><u>BOD</u>: Salt applications in parking lots are contracted out. Salt on sidewalks is applied by staff through modified drop spreaders which focus and limit the amount of salt application. Staff receive salting BMP education at least 1x/ 5 yrs.</p> <p><u>RC</u>: Chloride and salt are applied by staff at controlled rates through the use of calibrated distribution mechanisms. All chloride trucks have shut mechanisms to control distribution at all times and all drivers must be certified as to volume by the supplier. Employees watch training videos every winter to ensure salt and/or chloride is applied at a minimum rate which also protects the safety of the public. Staff also attends SEMCOG winter maintenance workshops as feasible and when made available.</p>

St. Clair County's Storm Water Permit Application Attachment

			<u>Nested Jurisdictions</u> : Only salt is applied. Employees receive education re: the need to minimize salt applications for pollution prevention.
Cold weather operations - snow pile disposal	Debris and pollutants from the road, chloride and salt	Low	<u>RC</u> : Snow is stored along roadways with the public's safety as its primary concern. <u>BOD and nested jurisdictions</u> : Snow is stored where there is space; it is safe for the public and in locations where it is as far from waterbodies or catch basins as feasible.
Vehicle Washing and maintenance	Detergents and debris from trucks	Low - High	<u>BOD</u> : All county vehicles are washed at a private facility where wastewater is directed to the sanitary. <u>RC</u> : The RC primarily washes its trucks at its main warehouse (outside the urbanized area) where all waste wash water is contained and goes to the sanitary system for treatment. Some trucks are washed at the Marine City Warehouse which also directs waste wash water to the sanitary system. <u>DO</u> : The DO washes all of its vehicles at a private car wash. <u>Nested Jurisdictions</u> : All nested jurisdictions wash vehicles at their own facilities where the wastewater is directed to the sanitary system.

This procedure will be updated within 45 days of the addition or removal of a BMP to address new and existing operation and maintenance activities. The procedure will be reviewed on an annual basis during the annual internal progress reporting for the MS4 permit to assure there have been no changes in O&M practices in county departments. This review process is started at St. Clair County NPDES MS4 Group Meetings and is an established process that has been ongoing with this group.

QUESTIONS 78), 79) PRIORITIZATION OF SWEEPING

RC: The RC prioritizes the sweeping of its roads based on the volume of traffic. All primary roads have a higher volume of traffic than the local roads and therefore are swept more often. Primary roads are swept 3xs/ year and local roads are swept 2xs/ year. A map of the local and primary roads within the urbanized area is available from the RC upon request.

BOD: The highest priority parking lot for sweeping is the Grand River Parking Lot. This lot is hand swept at least twice a year. All other parking lots are inspected in the spring and areas where debris accumulates are swept by hand and by community service workers. Staff ensures that debris is not in liquid form before it is disposed of in the dumpster.

Nested Jurisdictions: None of the nested jurisdictions think their parking lots are a high priority for sweeping. All parking lots will be inspected annually in the spring and hand swept in areas where sediment and garbage accumulate. Staff will ensure that material swept is not in liquid form before disposing of it in their dumpster.

St. Clair County's Storm Water Permit Application Attachment

SWEEPING METHODS QUESTION 80)

RC: The RC contracts all of its sweeping and does not specify the type of sweeper to be used. The following language is from the SCCRC's specifications for sweeping contracts, "Bidder shall be required to use fully up to date equipment capable of completing the work described herein on the prescribed schedule through the life of this contract. Bidders must submit a list describing the numbers, make, year and type of equipment available which is to be demonstrated and approved prior to the award of this contract. All sweepers must be dual controlled and equipped with right and left gutter brooms. Sweepers must be equipped with flashing traffic control arrow and rotating (360 degree) amber lights visible front and rear for safety purposes, and any other devices necessary for a safe operation. At least one additional flashing traffic control arrow will be required behind the last sweeper when sweeping multi-lane roads.

The following contract language will be added to contracts "***Contractors must operate their sweeping equipment according to the manufacturers operating instructions to protect water quality.***"

When the EGLE provides guidance on the BMPs and specifications it would like to see as part of sweeping contracts, the RC will be open to adding those specifications to its contracts as long as it is economically feasible.

BOD and Nested Jurisdictions:

As discussed in questions 78) and 79), the nested jurisdictions do not use mechanical sweepers because it is not needed. The hand sweep areas where debris accumulates each spring.

QUESTION 81)

Please refer to the "Street/Parking Lot Sweeping" Standard Operating Procedure for the proper dewatering and disposal methods of street sweeper waste material. Additionally, SCC will utilize the "Catch Basin Cleaning Activities Guidance Document" in which was referenced within the MS4 application.

MANAGING VEGETATED PROPERTIES QUESTION 82)

St. Clair County

The RC and DO contract out spraying of herbicides within their ROW. All contracts contain specifications that require contractors to have applicator licenses appropriate to work performed and as required by state law.

St. Clair County's Storm Water Permit Application Attachment

Nested Jurisdictions

Spot treatment using round up. Concentrated is commercially available and more economical.

- ACSD – Contract all spraying. All contracts contain specifications that require contractors to have applicator licenses appropriate to work performed and as required by state law.
- ECSD – All pesticides and herbicides are applied by two staff persons that are licensed applicators. These staff persons are take a refresher course every year to maintain their license as required by the state.
- PHASD – 1 staff is a licensed pesticide applicator. Only commercial grade Round up is used for spot treatment of weeds.
- RESA – Contract all spraying. All contracts contain specifications that require contractors to have applicator licenses appropriate to work performed and as required by state law.
- MPSD – Contract all spraying. All contracts contain specifications that require contractors to have applicator licenses appropriate to work performed and as required by state law.
- SC4 – Contract all spraying. All contracts contain specifications that require contractors to have applicator licenses appropriate to work performed and as required by state law. Minimal spot treatment is performed by staff but only using commercial grade product.

QUESTION 83) Employee Training

SCC and its nested jurisdictions will ensure staff (with jobs related to implementation of measures required by this Permit Application) is trained in IDEP and/or Good Housekeeping practices as appropriate to their job. This training shall occur within the first year of employment and at least one time every five years. Employee training that will be conducted by SCC and its nested jurisdictions may include any of the following activities as appropriate to the staff's particular job tasks:

- IDEP Training Workshops available through the Alliance of Rouge Communities.
- Pollution Prevention and Good Housekeeping Workshops available through the Alliance of Rouge Communities.
- Storm Watch training video available from the SCCHD
- SEMCOG's winter training workshops
- Winter Maintenance videos available from the SCCRC
- SC4's Winter Maintenance Manual
- Low Salt Diet fact sheet available from the SCCHD
- Storm Water Operator Certification available from the EGLE
- SEMCOG posters in maintenance facilities
- Spill Response Emergency Phone numbers posted in maintenance facilities
- Appropriately trained staff for facilities with Underground Storage Tanks (A & B license and training of staff who pump gas.)
- Staff Training via conferences and workshops related to MS4 management

St. Clair County's Storm Water Permit Application Attachment

QUESTION 84)

Contractor Requirements and Oversight

All contracts of SCC and its nested jurisdictions require private contractors to follow local, state and federal laws including those related to pollution prevention and good housekeeping regulations. SCC and its nested jurisdictions also conduct regular oversight (daily and weekly inspections) on all private contract jobs to ensure that contracted activities are being performed in an appropriate manner. When the EGLE provides more specific guidance re: the specifications it would like to see in contracts, SCC and its nested jurisdictions will include these as guidance documents in their contract's information packages.

Please additionally refer to the "Contractor Requirements and Oversight Procedure" attachment that establishes procedures for requiring contractors working for St. Clair County to comply with pollution prevention and good housekeeping BMPs while working on projects for St. Clair County government agencies and providing oversight to ensure compliance.

TOTAL MAXIMUM DAILY LOAD (TMDL) IMPLEMENTATION PLAN

QUESTIONS 85) – 88)

SCC has jurisdiction over an MS4 within the watershed of the Statewide *E. coli* TMDL. A TMDL plan has been developed and to address updates questions specific to the implantation of monitoring and BMPs.