

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 2000 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

SECTION V. OUTFALLS AND POINTS OF DISCHARGE

Identification numbers for discharge points/ outfalls, their receiving waters, and their latitude 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 2000 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:

- 1) ACSD: The ACSD has 4 schools and 1 complex that have an MS4 which are also located within the urbanized area as defined by the 2000 census.
- 2) ECSD: The ECSD has 8 properties that have an MS4 which are also located within the urbanized area as defined by the 2000 census.
- 3) MPSD: The MPSD has 5 properties that have an MS4 which are also located within the urbanized area as defined by the 2000 census.

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- 4) PHASD: The PHASD has 15 schools, 1 administration building and 1 operation and maintenance property that have an MS4 which are also located within the urbanized area as defined by the 2000 census.
- 5) RESA: The RESA has 3 properties that have an MS4 which are also located within the urbanized area as defined by the 2000 census.
- 6) SC4: The SC4 has one complex that has an MS4 which are also located within the urbanized area as defined by the 2000 census.

SECTION VII STORMWATER MANAGEMENT PROGRAM

QUESTION 1) ENFORCEMENT RESPONSE PROCEDURE (ERP)

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

- A) Illicit Discharge Elimination Program and
- 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.
 - 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.

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- 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 MDEQ 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 confirms the suspected illicit discharge.
 - 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 is 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

The nested jurisdictions have IDEP policies, but they do not have ERPs for them. They are in control of all the drainage from their own properties and therefore do not have to enforce their policy on anyone but themselves.

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B) POST CONSTRUCTION REGULATORY MECHANISM ERPs:

St. Clair County

Additional ERPs associated with the SCCRC and SCCDO's Post Construction requirements of this permit application will be submitted to the MDEQ by October 1, 2013. These include updates of ERPs for the following regulatory mechanisms:

- The SCC Road Commission's Procedures for Plat Street Development
- Rules of the St. Clair County Drain Commissioner

QUESTION 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.**

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 2000 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	Huron

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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 Waste Water 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 permittee's 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 working collaboratively with SCC as part of the NEW's collaborative IDEP plan. 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. These have been provided as **Attachment F**.

- HD: SCC's resolution 02-30, adopted November, 2002.
- RC: The RC's IDEP Policy #99, adopted in 2010.

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- 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.

These regulatory mechanisms currently do not meet all of the IDEP requirements listed in the Permit Applications' questions 21, 22, 23, 24, 25 and 26. These regulatory mechanisms will be updated to meet these requirements and resubmitted to the MDEQ by October 1, 2013.

Nested Jurisdictions:

SCC's nested jurisdictions have IDEP policies but they currently do not meet all of the Permit Application's requirements. These IDEP policies will be updated to meet the permit application requirements and submitted to the MDEQ by October 1, 2013.

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.
- 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.

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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 complaints 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 MDEQ of soil, sediment or other pollutants from construction sites

St. Clair County and its nested jurisdictions will notify the MDEQ 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 MDEQ.

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

St. Clair County

- HD

The HD notifies potential SESC permit applicants of the requirement to provide a Notification of Coverage to the MDEQ for all construction sites > 5 acres via their information packet titled, "Information Required to Process a SESC Permit:" Within this packet,

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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 \geq 5 acres obtains a SESC permit from the SCC Health Department, they are also required to submit a Notice of Coverage (NOC) to the MDEQ 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

QUESTIONS 33) – 37), 38) 39), 40), 41), 43)

St. Clair County

- RC and DO: The RC and DO are both updating their engineering standards to meet the post-construction stormwater runoff permit application requirements. They will submit these standards to the MDEQ by October 1, 2013.

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 2000 census.

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SITE SPECIFIC REQUIREMENTS

QUESTION 42) Reviewing the use of infiltration BMPs and ensuring lack of contaminated soils

St. Clair County

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

Off-Site Mitigation and Payment in Lieu Programs

QUESTIONS 44) – 53) The RC and DO are not pursuing these options at this time. Should any of these options become pertinent to the DO or RC's revised engineering standards; each agency will submit these procedures/ requirements to the MDEQ by October 1, 2013.

SITE PLAN REVIEW

QUESTION 54) The RC and DO are updating their engineering standards to meet the permit application requirements. They will submit these to the MDEQ by October 1, 2013.

QUESTION 55) Procedures for site plan review process

- **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**.

If the site plan review procedures and checklists change because of updates to these agency's post construction standards, these site plan review procedures will be resubmitted to the DEQ by October 1, 2013.

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QUESTION 56) 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)

The RC and DO are both updating their engineering standards to meet the permit application requirements. They will submit these standards to the MDEQ by October 1, 2013.

QUESTION 59) Does the maintenance agreement allow for: 1) Inspection of structural or vegetative BMPs, 2) necessary maintenance or corrective actions, 3) Tracking the transfer of O&M responsibility of the BMPs (i.e. deed restrictions).

- **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.

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 outfalls 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, ACSD's Transportation and Maintenance Facility, and RESA's Transportation Center.

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**. The only PIPP missing is the RESA Transportation Center which is currently being developed.

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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 also be reviewed and revised at the same time. 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 DEQ'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, 4 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 as needed
5	Administrative Offices	16 catch basins	Low	0	
6	Health Department	3 catch basins, 1 manhole	Low	0	
7	Jail, Sheriff's Office	? catch basins, 1 detention basin, 2 bioswales	Low	0	catch basin cleaning, detention basin and bioswale inspection and maintenance

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					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	Algonac Waste Water 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 as needed
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 as needed
5	Millside Elementary		Low	0	
6	Algonac Elementary	1 catch basin	Low	0	
7	Fair Haven Elementary	2 catch basins	Low	0	
East China School District					
1	St. Clair Middle School	16 catch basins, 1 detention basin	Low	0	catch basin cleaning and detention basin inspection/ maintenance
2	Gearing Elementary	7 catch basins	Low	0	catch basin cleaning and sweeping as needed
3	Eddy Elementary	11 catch basins	Low	0	
4	Marine City High School	32 catch basins, 1 detention basin	Low	0	catch basin cleaning and sweeping as needed, detention basin inspection and maintenance as needed
5	Marine City Middle School		Low	0	
6	Belle River Elementary	4 catch basins	Low	0	catch basin cleaning and sweeping as needed
7	Washington Life Center	11 catch basins	Low	0	
Marysville Public School District					
1	Marysville High School & Middle	80 catch basins, 1 underground	Low	8	catch basin cleaning and sweeping as

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	School	detention basin, 2 swales			needed, detention basin inspections and cleaning as needed.
2	Morton Elementary School	17 catch basins, 3 underground detention basins	Low	3	
3	Washington Elementary School	20 catch basins and 1 detention basin	Low	6	
4	Gardens Elementary School	15 catch basins	Low	5	
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 as needed
3	Port Huron High School	29 catch basins	Low	0	
4	Port Huron Northern High School	16 catch basins	Low	0	
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 as needed
2	Virtual Learning Academy	none	Low	0	Sweeping as needed
3	Transportation Center	1000 gallon above ground dbl. walled diesel tank, 3 catch	Medium	1	Develop PIPP, tank inspections, catch basin cleaning and sweeping as needed

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		basins			
St. Clair County Community College					
1	College Campus Complex	38 catch basins, 9 bioswales/rain gardens, 1 detention basin	Low	0	catch basin cleaning, sweeping, and bioswales and detention basin inspections and maintenance as needed
	Maintenance and Receiving Facility	3 catch basins	High	1, 4	SWPPP

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

QUESTION 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, and
- SC4: The SC4 has a SWPPP for its Maintenance and Receiving Facility.
- RESA: The RESA does not have a PIPP developed for its diesel tank at its transportation center but they plan to develop one as soon as possible.

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

All of 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.

RC: The RC currently does not have an inventory of the number of catch basins under its jurisdiction. 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 cleaned once per year. Local roads have a much lower volume of traffic so these catch basins are cleaned out once every two or three years depending on the budget available.

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 cleaned out twice a year. The

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lowest priority catch basins for cleaning are the Department of Human Services side of the Administration Building and the court house building and parking lot. These low priority catch basins will be inspected one time every five years to determine if they even need cleaning. All other catch basins will be cleaned once/ five 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 rip rap areas 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. A complete inventory of these basins will be completed within the first two years of the permit when these basins will be inspected, prioritized and a schedule for their inspection and maintenance will be established. 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.

Table 3 SCCDO Catch Basin Prioritization Areas	
Watershed(s)	Number of County Drains (62 total)
Lake Huron	14
Lower Black	10
St. Clair River, Belle River and Pine River	16
Anchor Bay	22

The catch basins along each drain in each area were evaluated for the presence of the following assessment factors.

0. Absence of any catch basins
1. A current source of sediment, sewage, trash or hydrocarbon pollutants
2. Spill History
3. Safety and Infrastructure concerns
4. Frequency of complaints and reoccurring field visits

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5. Support structure failures at site
6. Number of inlets
7. New construction
8. Lack of knowledge/ information

Table 4 Prioritization of SCCDO Catch Basin Cleaning					
Drain Code	Drain Name	Local Municipality	Estimated # of catch basins	Presence of Assessment Factors	Priority for Cleaning
Lake Huron Direct Drainage Watershed					
216	Dixie Park Plat	Burtchville Township	2	2, 3, 8	#1
596	No. 14		7	2, 5	#3
594	No. 12 Alternate		8	2, 6	
278	Galbraith & Branch 1	Fort Gratiot Twp.	2	7	
132	Carrigan & Branch No. 1		12	2, 7, 8	#2
298	Grace		5	2	
Lake Huron Direct Drainage Watershed Total # of Catch Basins			24		
Lower Black River					
154	Collins & Branches	Fort Gratiot Twp.	2	4, 5, 6	#2
770	Simpson Storm Sewer		5	6, 8	
609	No. 209	Fort Gratiot Twp.	7	5	
296	Gossman & Branches		39	5, 6, 7	
380	How Brandymore & Branches	City of Port Huron	3	1, 2, 5	#3
572	Mueller Farms Storm Sewer		15	4, 6, 8	
622	Oakwood Storm Sewer		67	1, 2, 4, 6, 8	#1
Black River Watershed Total # of Catch Basins			138		
St. Clair River, Belle River and Pine River					
390-9	Bunce Creek Branch 9	Port Huron Twp.	4	1, 2, 3, 4, 5, 6, 7	#1
390	Bunce Creek	City of Marysville	4		
540	Meno	City of St. Clair	2	6	
701	River Ridge Meno Branch	St. Clair Twp.	7	4, 6, 7	
699	River Ridge Branch of Jordan Creek		7	??	
408	Inches	East China Twp.	3	6	

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350	Hathaway		15	1, 3, 5, 6, 7	#2
524	McGregor		1	2, 6, 7	
792	St. Clair Shores		1	3, 5, 6	#3
152	Clippert	Cottreville Twp.	1	3, 5	
168	Cottrell & Extension	Marine City	1	2, 3	
643	Parquette		2	8	
186	Crowley		1	8	
288	Gladys		6	6	
St. Clair River, Belle and Pine River Total # of Catch Basins			55		
Anchor Bay					
282	Geyman	Cottreville Twp.	2	8	
184	Crocker	Clay Twp.	1	?	
156	Colony		1	8	
134	Cartwright		5	2, 5, 6	#3
334	Hammer	Ira Twp.	1	2	#1
649	Pelton		?	7	#2
Anchor bay Total # of Catch Basins			10		
GRAND TOTAL # of SCCDO CATCH BASINS			227		

Table 3 will be updated annually, as part of annual permit progress reports.

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 clean all catch basins 1x/ 5 years. If they find the need to clean them more often than they will report these activities in their permit progress reports.

QUESTIONS 73) and 73) Procedures for inspecting/ cleaning/ maintaining catch basins and dewatering/ disposal of materials SCC and its nested jurisdictions (except ACSD) 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 the MDEQ <http://www.michigan.gov/documents/deg/wb-stormwater->

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[CatchBasinGuidance 216198 7.pdf](#) to contractors performing catch basin cleaning and recommend that they follow these procedures. This is as long as the MDEQ continues to make such guidance available and does not require activities beyond that currently required by state laws and regulations. ACSD will follow the procedures used in the MDEQ 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 MDEQ and/or develop an inspection and maintenance procedure within the first year of SCC's permit.

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 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.

The RC has procedural standards for several of its maintenance activities within the ROW. These standards aim to conduct activities as efficiently as possible with the safety of the motoring public as its primary objective. When DEQ has guidance for the pollution prevention activities it would like to see incorporated into these standards the RC will be open to incorporating them as it economically feasible and if it does 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 4 – 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	Debris and	Low	<u>RC</u> : see work activity description narrative above.

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maintenance (pothole, sidewalk, and curb/gutter repair)	pollutants from the road, sediment, left over materials		<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>: see work activity description narrative above.</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>
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.</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 DEQ guidance in contract information packets if provided.</p> <p><u>RC</u>: see work activity description narrative above.</p> <p><u>Nested Jurisdictions</u>: Plowing is done as to minimize scrapping 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 availalbe.</p> <p><u>Nested Jurisdictions</u>: Only salt is applied. Employees receive education re: the need to minimize salt applications for pollution prevention.</p>
Cold weather operations - snow pile disposal	Debris and pollutants from the road, chloride and salt	Low	<p><u>RC</u>: Snow is stored along roadways with the public's safety as its primary concern.</p> <p><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.</p>
Vehicle Washing and maintenance	Detergents and debris from trucks	Low - High	<p><u>BOD</u>: All county vehicles are washed at a private facility where waste water is directed to he sanitary.</p> <p><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.</p> <p><u>DO</u>: The DO washes all of its vehicles at a private car wash.</p> <p><u>Nested Jurisdictions</u>: All nested jurisdictions, except for the ECSD, wash vehicles at their own facilities where the waste water is directed to the sanitary system. ECSD is currently investigating options for properly disposing of its wash water from washing its buses.</p>

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This procedure will be updated when specific guidance from the DEQ is available and on an annual basis during annual progress reporting for the permit.

QUESTION 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 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.

QUESTION 80) SWEEPING METHODS

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. When the DEQ 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.

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MANAGING VEGETATED PROPERTIES

QUESTION 82)

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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.

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

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- SC4's Winter Maintenance Manual
- Low Salt Diet fact sheet available from the SCCHD
- Storm Water Operator Certification available from the MDEQ
- 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

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 MDEQ 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.

TOTAL MAXIMUM DAILY LOAD (TMDL) IMPLEMENTATION PLAN QUESTIONS 85) – 88)

SCC has jurisdiction over an MS4 within the watershed of the Black River *E.coli* TMDL.

The Howe Brandymore and Stocks Creek Drains are the two primary tributaries within this TMDL watershed. Investigative IDEP work has been proposed in these two drains as part of the IDEP plan. The prioritization process for these investigations and the monitoring plan for these BMPs are also included in the IDEP plan.

Nested Jurisdictions: The PHASD and SC4 have jurisdiction over an MS4 within the watershed of the Black River *E.coli* TMDL. As discussed in the IDEP plan, all PHASD and SC4 facilities have been dye tested to ensure that there are no cross connections between the sanitary and MS4. There are no other *E.coli* sources at these facilities to the knowledge of these educational institutions. Pets are not allowed and wildlife is not a problem on these campuses. Therefore these entities do not have any response to the following Permit Application requirements:

- Identifying and prioritizing BMPs currently being implemented or to be implemented to reduce *Ecoli* pollutant loadings.
- List of BMPs currently being implemented to make progress toward achieving Ecoli pollutant load reductions;
- Monitoring Plan for assessing the effectiveness of TMDL BMPs.