

Mt. Morris Consolidated Schools



District Pollution Prevention Plan

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DISTRICT POLLUTION PREVENTION PLAN

Approved & Submitted by

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- A Storm Sewer System Site Maps
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District Pollution Prevention Plan

1.0 Introduction

This District Pollution Prevention Plan (DPPP) has been developed to reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable and protect water quality in accordance with the appropriate water quality requirements of Michigan Act 451, Public Acts of 1994, Part 31, and the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq.). Mt. Morris Consolidated Schools (MMCS) will implement and enforce this DPPP to the Maximum Extent Practicable. MMCS has entered into a Cooperative Intergovernmental Services Agreement (hereinafter referred to as a “Nesting Agreement”) with the Genesee County Drain Commission (GCDC). In order to retain the authorization to discharge, Genesee County is required to submit a plan with the “NPDES Application for Discharge of Stormwater to Surface Waters from a Municipal Separate Storm Sewer System (MS4)”.

This DPPP includes measurable goals for Best Management Practices (BMP), focusing on the six minimum measures. Measurable goals describe the actions MMCS will take to implement each BMP and allow MMCS to evaluate progress toward meeting key objectives outlined in the following sections.

Mt. Morris Consolidated Schools’ owns and operates seven (7) public facilities within the boundaries of the “Flint Urbanized Area”. All of MMCS properties are within the urbanized area based off of the 2010 Census data, and the facilities include:

1. Batterbee Park
2. Elisabeth Ann Johnson High School
3. Montague Elementary School
4. Moore Elementary School
5. Mt. Morris Education & Community Center
6. Mt. Morris Middle School, Administration Building & Maintenance Facility
7. Pinehurst Elementary School

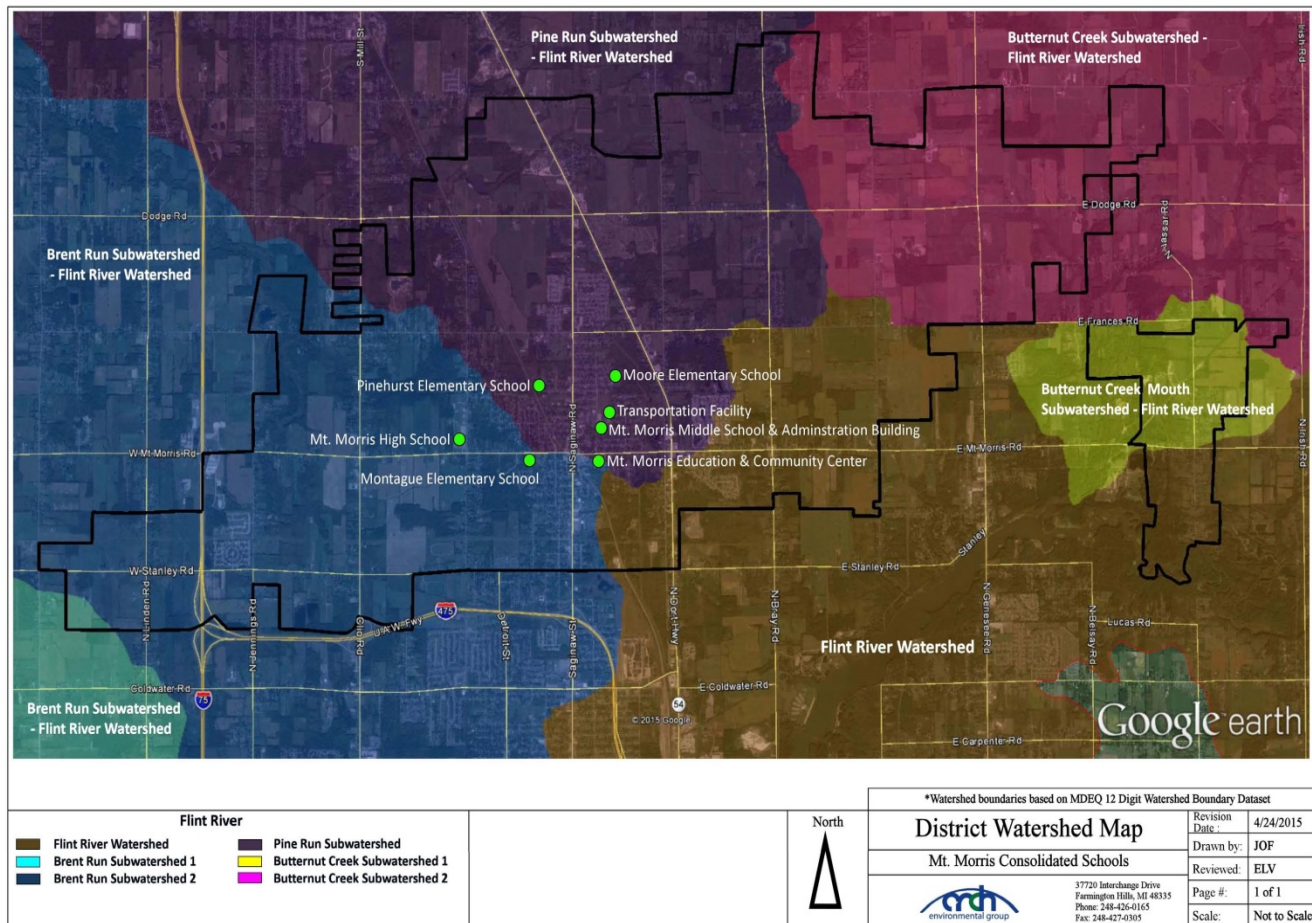
The DPPP program will be reviewed annually to focus and modify activities as well as maximize environmental benefits of the plan.

1.1 Outfalls & Discharge Points/ Receiving Waters

Mt. Morris Consolidated Schools has identified outfalls and discharge points that discharge directly into surface waters of the state and discharge points that discharge into other MS4 drainage systems. Mt. Morris Consolidated Schools’ drainage system discharges directly or indirectly into the Flint River Watershed detailed in Map 1 below.

Mt. Morris Consolidated Schools has developed site specific storm sewer system maps which identifies outfall and discharge locations, discharge point source identification numbers, locations of discharge and receiving waters. Copies of these maps are provided in Appendix “B”.

Map 1 – District Watershed Map¹



2.0 District Pollution Prevention Plan (DPPP) Minimum Control Measures

This DPPP has been developed to describe the Best Management Practices (BMPs) MMCS will implement to meet the six minimum control measures and water quality requirements. The six minimum control measures include:

- **Public Participation/Involvement Program (PPP)**
- **Public Education Program (PEP)**
- **Illicit Discharge Elimination Program (IDEP)**
- **Construction Stormwater Runoff Control Program**
- **Post Construction Stormwater Runoff Program**
- **Pollution Prevention/Good Housekeeping Program**

¹ Watershed boundaries based on Environmental Protection Agency MyWATERS Mapper National Hydrography Dataset Mapper 12-Digit Watersheds.



2.1 Public Involvement/Participation Program (PPP)

Engaging and empowering the public in the effort to reduce the impacts of stormwater runoff is a key element of the public involvement/participation program.

2.1.1 PUBLIC INVOLVEMENT/PARTICIPATION PROGRAM OBJECTIVES

1. Make the DPPP available to the public through stormwater webpage.
2. Process for inviting public involvement and participation in the implementation of DPPP best management practices and periodic review of the DPPP.



2.1.4 PUBLIC INVOLVEMENT & PARTICIPATION PROGRAM (PPP) BMP TABLE

BMP	Implementation of BMP	Measurable Goal	Measure of Assessment
BMP #1 Public Availability of DPPP	Make the DPPP available to the public through stormwater webpage.	DPPP available for review on the district webpage, including contact information for comments.	Verify DPPP available on stormwater webpage, and track changes webpage posting of DPPP.
BMP #2 Stormwater Blog	Post link to stormwater blog on district website.	A link to a stormwater blog established and maintained on the district stormwater webpage to assist in distributing information and updating the public on the watershed and activities.	Copies of monthly stormwater blog postings for reporting period.
BMP #3 Stormwater Education Program Survey	Post survey on district website.	Survey posted on the stormwater webpages and link maintained throughout the permit term to assess community knowledge and provide input into stormwater implementation.	Results of completed surveys.
BMP #4 Participation Activities	Engage in environmental education activities.	Increase public participation in environmental activities and outreach events. Participation activities include water quality issues, stormwater management initiatives, home toxics, recycling, compost and disposal.	Reports of participation.



2.2 Public Education Program (PEP)

Mt. Morris Consolidated Schools' "Public Education Program (PEP)" is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants into the MMCS separate storm sewer system.

The term "Public" as referred to in this program is defined to include all persons who could potentially affect the quality of stormwater discharges from MMCS properties including but not limited to MMCS faculty, staff, contractors, and students of MMCS, as well as area residents, visitors, public employees, local businesses, industries, construction contractors and property developers. This PEP will include a variety of mechanisms and venues to provide watershed awareness and pollution prevention education throughout the MMCS jurisdiction.

2.2.1 PUBLIC EDUCATION PROGRAM OBJECTIVES

- A. Responsibility and stewardship in their watershed.
- B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.
- C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.
- D. Promote preferred cleaning materials and procedures for car, pavement, and power washing.
- E. Inform and educate the public on the proper application and disposal of pesticides, herbicides, and fertilizers.
- F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter the MS4.
- G. Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.
- H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.
- I. Promote methods for managing riparian lands to protect water quality.
- J. Identify and educate commercial, industrial, and institutional facilities about good housekeeping.
- K. Provide training for staff.



2.2.3 PUBLIC EDUCATION PROGRAM BMP TABLE

BMP Topic	Description of BMP	Measurable Goal & Key Messages	Measure of Assessment
BMP #1 (A) Promote public responsibility and stewardship in watershed.	Watershed website. Watershed specific website hosted by district; featuring watershed map, description of watershed, and links to watershed groups.	Supply watershed information and promote watershed membership information. Educate the public on local water body health.	Update webpages as necessary. Confirm posting & track webpage reviews. Provide watershed membership information.
	Place SEMCOG "7 Simple Steps to Clean Water" information on stormwater webpages.	SEMCOG "7 Simple Steps to Clean Water" information and links.	Update webpages as necessary. Confirm posting & track webpage reviews.
	Review K-12 Science Curriculum to highlight items applicable to this program plan.	Review and update curriculum table, detailing number of students/grades level participating within each identified curriculum topic.	Documentation of communication with faculty.
		Communicate with faculty regarding the resources available to reach the student audience.	Documentation of communication with faculty.
	Publicize environmental related events through email, newsletters or social media.	Promote public awareness on environmental issues and increase district environmental participation.	Date, time location and name of event attended.
			Maintain copies of email notices (watershed announcement) of educational materials provided to district staff.



BMP Topic	Description of BMP	Measurable Goal & Key Messages	Measure of Assessment
BMP #2 (B) Educate the public about the connection of the MS4 to the area waterbodies and the potential impacts discharges could have on surface waters of the state.	Posting of the training video “When it Rains, it Drains...The Stormwater Question” on the district webpage.	Educate the public on local water bodies, water quality issues, and impacts of discharges on surface waters through visual media.	Update webpages as necessary. Confirm posting & track webpage reviews.
	Include information and links to USEPA and MDEQ Stormwater information on district stormwater webpage.	Provide resources to water quality issues and impacts of discharges on surface waters.	Update webpages as necessary. Confirm posting of links & track webpage reviews.
	SEMCOG posters placed strategically throughout the district.	Maintain SEMCOG posters at each operational facility.	Annual review of postings. Number of posters placed throughout district.
	General Stormwater Awareness Training (Level I Training further described in Sec. 3.0 of this DPPP)	Provide training to teachers, administrative and support staff not conducting Illicit discharge/pollution prevention training.	Copy of sign in sheets and Agenda (if available).
		Post stormwater training video on stormwater webpage.	Update webpages as necessary. Confirm posting & track webpage reviews.
BMP #3 (C) Educate the Public on Illicit Discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.	Publicize 24-hour environmental hot-line phone numbers and instructions for reporting spills, illicit discharges, or connections.	Track # of calls received on hotline per year. All calls to be addressed-outcome of calls.	Number of calls to the Stormwater Manager.
		Place 24-hour environmental hot-line posters throughout the district.	Promotion/ publicizing efforts; number of posters placed throughout district.
	Pollutants & Illicit Discharges webpage; featuring information regarding sources of pollution, how pollutants cause damage, illicit discharges, and how to report illicit discharges.	Promote public reporting and importance of proper disposal. Goal of one (1) poster per building.	Annual review of postings. Number of posters placed throughout district.
	SEMCOG posters placed strategically throughout the district.	Maintain SEMCOG posters at each operational facility.	Annual review of postings. Number of posters placed throughout district.



BMP Topic	Description of BMP	Measurable Goal & Key Messages	Measure of Assessment
BMP #4 (D) Promote preferred cleaning materials and procedures for car, pavement, and power washing.	SEMCOG posters placed strategically throughout the district.	Maintain SEMCOG posters at each operational facility.	Annual review of postings. Number of posters placed throughout district.
	Discontinue practice of allowing school or other private groups from holding car wash fund raising project on school property.	Send notice to all school principals, non-profit groups, and school club presidents informing them of the new policy.	Copy of annual notice.
BMP #5 (E) Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.	Maintain a district “Good Housekeeping” informational page on stormwater management webpages.	Address the environmental (including water quality) and resulting from improper handling and disposal of pesticides, herbicides, and fertilizers.	Update webpages as necessary. Confirm posting & track webpage reviews.
	SEMCOG posters placed strategically throughout the district.	Maintain SEMCOG posters at each operational facility.	Annual review of postings. Number of posters placed throughout district.
BMP #6 (F) Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4	SEMCOG posters placed strategically throughout the district.	Maintain SEMCOG posters at each operational facility.	Annual review of postings. Number of posters placed throughout district.
BMP #7 (G) Identify and promote the availability, location and requirements of facilities for collection and disposal of household hazardous wastes, travel trailer wastes, chemicals, and motor vehicle fluids.	Maintain a district “Household Hazardous Waste” informational page on stormwater management webpages.	Address the environmental (including water quality) and public health effects resulting from improper handling and disposal of household hazardous waste, reduce the use of home toxics, keep citizens informed about the choices and responsibilities associated with purchasing, handling and disposing of toxic substances. Increase the number of residents using the program to dispose of home toxics.	Update webpages as necessary. Confirm posting & track webpage reviews.



BMP Topic	Description of BMP	Measurable Goal & Key Messages	Measure of Assessment
BMP #8 (H) Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.	Maintain a district “Sewer Overflows and Septic Systems” informational page on stormwater management webpages.	Educate why sewer overflows and septic systems are pollution issues. Promote proper and consistent maintenance of septic systems.	Update webpages as necessary. Confirm posting & track webpage reviews.
BMP #9 (I) Promote methods for managing riparian lands to protect water quality.	Maintain a district “Riparian Zone Management” informational page on stormwater management webpages.	Educate on why riparian zones are important, what riparian zone management is (river friendly lawn care, riparian buffer zones, stream bank stabilization, woody debris management, river maintenance). Increase number of riparian landowners who implement BMPs	Update webpages as necessary. Confirm posting & track webpage reviews.
	Encourage teachers and students to participate in stream bank monitoring programs.	Increase awareness; inspire people to take actions that lead to better river protection at home and in their communities.	Report on schools that participated in monitoring programs.
BMP #9 (J) Promote methods for managing riparian lands to protect water quality. Cont.	Include guidance and links on Stormwater webpage on native vegetation.	Maintain a district “Native, Non-Native, & Invasive Species” and “Why Use Native Plants?” informational page on stormwater management webpages. Increase the use of native plants and encourage the use of gardens at school facilities.	Update webpages as necessary. Confirm posting & track webpage reviews.
BMP #10 (K) Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.	Require contractors or vendors whose activities have potential to impact water quality to train applicable staff and follow the requirements of the DPPP. Direct contractors to online training. [All Stormwater Training is outlined in Section 3.0 Training].	Contractors training and informed of pollution prevention and good housekeeping techniques.	Copy of sign in sheets, pre-project meeting notes or inspections.
BMP #11 Stormwater Education Program Effectiveness Survey	Post survey on district website	A survey has been posted on the stormwater webpages and will be posted throughout the permit term to ascertain behavioral changes.	Annual results of survey.



BMP Topic	Description of BMP	Measurable Goal & Key Messages	Measure of Assessment
BMP #12 Public Education Program Assessment	Summary of annual public education activities for the "Public Education" component to evaluate the effectiveness.	Determine the level of education provided and identify areas of improvement.	Annual DPPP review. Summary of public education activities.



2.3 Illicit Discharge Elimination Program (IDEP)

MMCS has entered into a Nesting Agreement with the Genesee County Drain Commission (GCDC). GCDC will conduct the IDEP activities required by the permit on behalf of its nested entities.

2.3.1 ILLICIT DISCHARGE ELIMINATION PROGRAM (IDEP) PROGRAM OBJECTIVES

1. Establish authority to investigate, inspect and monitor suspected illicit discharges.
2. Maintain maps of the MS4, points of discharge, and outfalls.
3. Prohibit non-stormwater discharge into the MS4.
4. Provide regular training to staff.
5. Instruct contractors to prevent dumping into the MS4.
6. Illicit discharge identification and elimination program performance & effectiveness.

2.3.2 DRY WEATHER SCREENING

As part of the nesting agreement, GCDC shall perform all required monitoring activities for each Municipal Separate Storm Sewer System (MS4) that is owned by the District.

2.3.3 POLLUTING MATERIALS EMERGENCY AND SPILL RESPONSE POLICY AND PROCEDURES

Purpose

This policy and associated procedures have been developed to define appropriate and safe response procedures for spill or accidental releases of hazardous materials or substances at all Mt. Morris Consolidated Schools' facilities.

Policy

MMCS will comply with all Federal, State, and local regulatory requirements for the management and reporting of all hazardous materials and/or waste releases.

The Transportation or Administrative Office will maintain responsibility for monitoring any changes in regulatory requirements regarding hazardous materials and waste spills or accidental releases. This policy will be revised as necessary based upon any changes in the regulatory requirements or internal experiences. All hazardous materials spills or releases will be thoroughly investigated by the Transportation or Administrative Office. The Transportation or Administrative Office will be responsible for developing, maintaining, and implementing procedures for managing significant or hazardous materials spill response and associated employee education and training for compliance with the policy and procedures.

The Administrative Office will immediately report any release of any polluting materials from the MS4 to surface waters or groundwater of the state, unless a determination is made that the release is not in excess of the threshold reporting quantities in the Part 5 Rules.

If it is determined that the release poses a threat to the safety or the environment outside the facility, the Director of Finance and Operations will report the release to the 24-hour **Michigan Pollution Emergency Alerting System (PEAS) at 1-800-292-4706** immediately or within 24 hours of knowledge of the release. Any release of oil (includes gasoline, diesel fuel, used oil and mineral spirits) to navigable waters or adjoin shorelines will be reported to the 24-hour **National Response Center (NRC) at 1-800-424-8802** immediately or within 24 hours of knowledge



of the release. In the event the spill takes place after working hours, site personnel will contact the assigned coordinator to notify the Administrative Office that an incident has occurred.

The Transportation or Administrative Office will be responsible for developing, maintaining, and implementing procedures for managing significant or hazardous materials spill response and associated employee education and training for compliance with the policy and procedures. The Administrative Office is responsible for notifying the MDEQ and/or other local, state, or federal regulatory agencies in the event that a release to the MS4 or surface waters occurs at levels above the threshold reporting quantities referenced in the PA 451 Part 5 rules.

Emergency Spill Response Procedures

Each facility having the potential for the release of a hazardous material or substance shall have trained and knowledgeable staff members to respond and/or implement spill response procedures for that facility. Spill containment materials such as absorbent pigs, pads, booms, diking materials, storm drain covers, etc. are to be stored and maintained at all facilities for use by trained employees in the event of a spill or accidental release. The following general guidelines are to be implemented as applicable in managing spills and accidental releases:

- 1) For spills in which there is no immediate dangers to employees, students, or the general public and does not represent a danger of contamination to a sanitary sewer, storm sewer, of the ground:**
 - A. Contain spill to the smallest area possible.
 - B. Review the Material Safety Data Sheet for determination of proper spill handling, and appropriate personal protective equipment selection.
 - C. Place compatible absorbent material or spill pads on the area.
 - D. Clean up and containerize the absorbent materials.
 - E. Contact the Transportation and Administrative Office for waste disposal instructions and additional cleaning requirements.
- 2) For a spill that represents an immediate danger to employees, students, or the general public and/or has the potential to impact the sanitary sewer, storm sewer, or the ground:**
 - A. Notify the Administrative Office.
 - B. If there is the treat of fire, explosion, or if any person(s) exhibits severe symptoms of exposure, contact 911 to initiate local emergency services.
 - C. Alert anyone in the area and begin evacuation procedures.
 - D. Use absorbent socks, booms, or other absorbents to dike the spill area if safe to do so and secure the area from unauthorized personnel. Refer to the Material Safety Data Sheet to determine the proper personal protective equipment.
 - E. Remove all sources of ignition for releases of flammable or combustible materials.
 - F. The Administrative Office will initiate all notification procedures and contact the contracted emergency response contractor to mitigate and remediate the release.
 - G. Complete the "Hazardous Material or Waste Spill Exposure Form" for all exposed persons.
 - H. The Administrative Office will assess the spill and notify all agencies as required.
- 3) Spills of Elemental Mercury**
 - A. Contact the Administrative Office immediately.



- B. Remove all personnel from the immediate spill area without traveling through the spill area, and if possible, close the door and lower the thermostat in the affected room.
- C. Keep all potential contaminated persons in a close area to the spill but outside of the affected area to minimize additional exposure to mercury vapors.
- D. Remove and containerize any potentially contaminated clothing or other articles from affected persons.
- E. The Administrative Office will contact the appropriate emergency response contractor to clean-up the spill and properly decontaminate and/or dispose of all contaminated articles.

This guidance has been developed in anticipation of potential releases of hazardous materials and substances. The procedures outlined in this guidance should only be implemented by those persons who have received sufficient training and are competent in the handling of the released material.

As appropriate, illicit discharges or releases of polluting materials will be corrected through administrative measures including employee training, placement of signs or markings, policy revisions, or any other steps necessary to eliminate the continued release of polluting materials to the MS4. MMCS will conduct follow-up inspections and sampling as needed to ensure that appropriate action has been completed.



2.3.4 ILLICIT DISCHARGE ELIMINATION PROGRAM – BMP TABLE

BMP	Description of BMP	Measurable Goal	Measure of Assessment
BMP #1 Facility Storm Sewer System Maps	Provide an up to date storm sewer system map. The maps shall identify the storm sewer system, location of outfalls and points of discharge, and names and locations of the surface waters of the state receive the discharge.	100% of facilities mapped, and 100% of storm sewer system updates mapped.	Maintain facility site maps at Administrative Building.
			Update facility map with sewer system updates. Maintain maps for progress report submittal.
BMP#2 Enforcement	Written policy to enforce elimination of illicit discharges into MS4 owned by the Permittee.	Approval of Board Policy Resolution.	Copy of Board Policy Resolution.
BMP #4 Illicit Discharge Reporting	Eliminate illicit discharges and connections through reporting, routine storm sewer system inspections and dry weather screening inspections.	Place “How to spot illicit discharge/ How to Report-Hotline Numbers” posters placed in Receiving Rooms at each MMCS operational facility. Goal is to have one poster at each facility.	Annually verify number of posters in place throughout the district.
		Advertise reporting hotline on district webpage.	Track number of calls and document calls onto Illicit Discharge/Illegal Dumping Reporting form. (Attachment “C”).
BMP #5 Unauthorized Discharge/ Illicit Discharge Complaint Response	MMCS will immediately evaluate any potential unauthorized or suspected illicit discharge to the municipal separate storm sewer system (MS4) and perform any necessary notifications and reporting to the applicable agencies (i.e., MDEQ, local drain commission, etc.) within the required time period(s).	100% of unauthorized or suspected illicit discharges evaluated (field observation, field screening, and source investigation) and eliminated.	Documentation of relevant field observations, field screening or source investigations.
BMP #6 Illicit Connections	Reroute, repair, or disconnect any illicit connections.	Take steps to eliminate 100% of identified illicit connections.	Work order, receipt or report detailing the illicit connection correction activities.



BMP	Description of BMP	Measurable Goal	Measure of Assessment
BMP #7 Illicit Discharge Elimination Training	Train staff on the identification and reporting of illicit discharges or improper connections and the cleanup/notification procedures for spills of polluting materials.	Goal of providing illicit discharge elimination training to all maintenance, transportation, custodial and skilled trade staff who work for MMCS. [All Stormwater Training is outlined in Section 3.0 Training]	Copy of sign in sheets and Agenda (if available).
BMP #8 Notice of Intent to Discharge Tracer Dyes	Maintain approval from the MDEQ for authorization to discharge tracer dyes in surface waters per General Rule 97 to conduct source investigations.	MDEQ approval to discharge tracer dyes.	Documentation of MDEQ approval.
BMP #10 IDEP program Performance & Effectiveness	Review performance measures to evaluate the effectiveness of the IDEP program. Items include; posting of IDEP public education posters, number of outfalls/discharge points screened, number of illicit connections found, number of illicit connections eliminated, number and type of violations investigated, and number of scheduled clean-outs and routine maintenance work conducted.	Annual review of SWMP IDEP program performed.	Maintain copy of DPPP annual review and evaluation information for progress reporting.



2.4 Construction Site Stormwater Runoff Control Program

MMCS goal is to establish procedures for construction stormwater runoff control to meet minimum measure requirements to the maximum extent practicable.

Construction refers to actions that result in a disturbance of the land, including clearing, grading, excavating, and other similar activities.

Construction-related activities are activities that support the construction project such as stockpiles, borrow areas, concrete truck washouts, fueling areas, material storage areas and equipment storage areas.

2.4.1 CONSTRUCTION SITE STORMWATER MANAGEMENT PROGRAM OBJECTIVES

- A. MMCS shall require that its architects, engineers and contractors comply with the best management practices approved by GCDCC for design and construction of ALL construction projects undertaken by the District and that it shall not proceed with any construction projects until the proposed project has been submitted to and approved by GCDCC.
- B. Process for notify the Part 91 Agency appropriate staff when soil or sediment is discharged to the MS4 from a construction activity.
 - The procedure shall allow for the receipt and consideration of complaints or other information submitted by the public or identified internally as it relates to construction stormwater runoff control.
- C. Procedure for when to notify the MDEQ when soil, sediment, or other pollutants are discharged to the MS4.
 - Other pollutants include pesticides, petroleum derivatives, construction chemicals, and solid wastes that may become mobilized when land surfaces are disturbed.
- D. Procedure for ensuring that construction activity one acre or greater in total land disturbance obtains a Part 91 Permit.

2.4.2 GENESEE COUNTY DRAIN COMMISSION

MMCS will ensure that all construction activities will not proceed, regardless of size, until the proposed project has been submitted to and approved by GCDCC.

2.4.3 PART 91 PERMIT

MMCS will ensure that any construction activity that results in a land disturbance meeting the following criteria:

- Greater than or equal to one (1) acre, or
- Disturb less than one (1) acre that is part of a common plan of development or sale.

MMCS will obtain a Part 91 Permit through the site plan review process with the appropriate county or municipal permitting agency.

2.4.4 PERMIT BY RULE COMPLIANCE

MMCS shall comply with the State of Michigan Permit by Rule (Rule 323.2190) for stormwater discharge from construction activity. Sites disturbing one (1) to five (5) acres with a point source discharge to the waters of the



state receive automatic stormwater coverage upon securing a SESC permit from the appropriate county or municipal permitting agency or being designated an Authorized Public Agency (APA) under the authority of Part 91.

1. Construction sites with at least one (1) acre but less than five (5) acres of soil disturbance with a surface water discharge, must obtain a county or municipal SESC permit, and are required to follow the provisions of the Permit by Rule, but do not need to notify the MDEQ of the construction activity.
2. Construction sites disturbing over five (5) acres with a point source discharge to the waters of the state must obtain a county or municipal SESC permit and submit a Notice of Coverage (NOC) and other pertinent documents and the appropriate fee to the MDEQ.

Requirements of Permit by Rule include, but are not limited to:

- Weekly site inspections conducted by a Certified Construction Stormwater Operator.
- Inspection within 24 hours of a precipitation event that results in a discharge from the site by a Certified Construction Stormwater Operator.



2.4.5 CONSTRUCTION SITE STORMWATER MANAGEMENT-BMP TABLE

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #1 Notification of Deposit during Inspection	MMCS will notify the local part 91 agencies or MDEQ when runoff from the construction site discharges significant pollutants to the MS4 or surface waters of the state within 24 hours of discovery or as otherwise required by the issuing agency. The MMCS Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency.	As Necessary	100% discharges identified and appropriate agencies notified. Control of potential system failure.	Documentation of Construction Stormwater Operator site inspection.
	Track complaints submitted by the public or noted by staff during regular course of business of soil, sediment, or other pollutants such as pesticides, petroleum derivatives, construction chemicals, and solid wastes are being discharged into the MS4.			Documentation of public complaint (Name of person providing the complaint, location [address or nearest cross street] description of follow up [e.g., date referred to the Part 91 enforcing agency]).
BMP #2 Genesee County Drain Commission	MMCS will ensure that all construction activities will not proceed, regardless of size, until the proposed project has been submitted to and approved by GCDC.	With each Construction Project	100% of projects submitted	Documentation of approval.
BMP #2 Part 91 Permit	MMCS will ensure that any construction activity that result in a land disturbance greater than or equal to one (1) acre or	As Necessary	100% of permits obtained.	Copy of permit and associated soil erosion and sedimentation control plans.



BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
	disturb less than one (1) acre that is part of a common plan of development or sale will obtain a Part 91 Permit through the site plan review process.			
BMP #3 Permit by Rule	Construction sites between (1) acre but and five (5) acres of soil disturbance follow the provisions of the Permit by Rule, but do not need to notify the MDEQ of the construction activity.	As Necessary	Goal of 100% of weekly and precipitation event inspection completed by certified Construction Stormwater Operator.	Copy of inspections.
	Construction sites disturbing over five (5) acres with a point source discharge to the waters of the state must follow provisions of the Permit by Rule and submit a Notice of Coverage (NOC) and other pertinent documents and the appropriate fee to the MDEQ.		Goal of 100% of weekly and precipitation event inspection completed by certified Construction Stormwater Operator.	Copy of inspections.
			100% NOC obtained.	Copy of NOC



2.5 Post Construction Stormwater Controls for New Developments & Redevelopments

The following MMCS Post Construction Management Program is designed to implement and enforce a program to minimize stormwater discharged and to increase the water quality into the drainage system from new development and redevelopment projects.

2.5.1 POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM OBJECTIVES

The post-construction stormwater run-off controls are necessary to maintain or restore stable hydrology in receiving waters by limiting surface runoff rates and volumes and reducing pollutant loadings from sites that undergo development or significant redevelopment.

The objects of this program and associated procedures are to:

- a. Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impacts.
- b. Develop and implement regulatory mechanisms for projects that disturb one or more acre, including projects less than an acre that are part of a larger common plan of development or sale and discharge into the applicants MS4.
- c. Ensure post construction controls to minimize water quality impacts by following water quality treatment standards.
- d. Require that BMP's be designed on a site-specific basis to reduce post-development total suspended solids loading.
- e. Procedure for the use of Infiltration BMP's to meet water quality treatment and channel protection standards of new development or redevelopment projects.
- f. Address "hot spots".
- g. Submit site development plans for review and approval to Genesee County and other applicable regulatory agencies.
- h. Require adequate long-term O&M of BMPs by ordinance or other regulatory mean.

MMCS is in the process of developing a board policy resolution, to direct compliance with these requirements. In addition to the board policy resolution, the following sections identify specific actions to be taken by MMCS to ensure compliance with the applicable standards. A copy of the approved MMCS School Board Policy Resolution will be provided in the following progress report.

2.5.2 WATER QUALITY TREATMENT STANDARD

MMCS goal is to include water quality treatment volume standards for each new construction or redevelopment of projects where the area of disturbance exceeds one (1) acre. One or more of the following treatment standards should be included as part:

- 1) Treat the first one inch of runoff from the area of new construction or redevelopment.
- 2) Treat the runoff generated ninety percent (90%) of all runoff-producing storms for the project site.

The source of the rainfall data for the water quality treatment standard of requiring the treatment of the runoff generated from the ninety percent (90%) of all runoff-producing storms is:



- The MDEQ memo dated March 24, 2006, which is available via the internet at www.michigan.gov/documents/deq/lwm-hsu-nps-ninety-percent_198401_7.pdf.

Treatment methods shall be designed on a site-specific basis to achieve the following:

1. A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff, or
2. Discharge concentrations of TSS not to exceed 80 milligrams per liter (80mg/L).

A minimum treatment volume standard is not required where site conditions are such that TSS concentrations in storm water discharges will not exceed 80mg/L.

Treatment methods shall be designed on a site-specific basis to reduce the discharge of sedimentation or TSS from the site. Such methods may include:

1. Stand pipe filters in storm water detention basins
2. Sediment filter tanks
3. Catch basin sumps
4. Aqua-Swirls®
5. Treatment trains
6. Rain Gardens
7. Pervious pavement systems

2.5.3 CHANNEL PROTECTION PERFORMANCE STANDARD

MMCS understands that channel protection criteria are necessary to maintain post-development stormwater runoff volumes and peak flow rates at or below existing levels for all storms up to the 2-year, 24-hour event. "Existing Levels" means the runoff volume and peak flow rate for the last land use prior to the planned new development or redevelopment.

Where more restrictive channel protection criteria already exist or is needed to meet the goals of reducing runoff volume and peak flows to less than existing levels on lands being developed or redeveloped, MMCS will consider use of the more restrictive criteria rather than the standard permit requirements.

A post-construction stormwater runoff program compliance assistance document is available via the internet at www.michigan.gov/documents/deq/wb-storm-ms4-runoffvolume_331235_7.xls.

2.5.4 SITE –SPECIFIC REQUIREMENTS

Because each site has its' own special circumstances and conditions the following BMPs will be considered as appropriate according to site conditions.

- Reduce runoff from the site to greatest extent possible (provide holding basins, divert water through grassed swales).
- Prevent spills and discharges.
- Control waste such as building materials, concrete washout, chemicals, litter, and sanitary waste.
- Phasing will be considered to limit amount of exposed soils.
- Interim soils stabilization methods are to be considered (temporary seeding, mulching etc.).



- Buffer preservation (avoid exposing soils to property limits).
- Inspection staff will be trained in the proper maintenance and operation of Soil Erosion and Silt Prevention measures.

Construction plans will be reviewed for sites with known soil and/or groundwater contamination, including potential “hot spots” and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria. Hot spots include areas with the potential for significant pollutant loading such as vehicle service and maintenance facilities, vehicle equipment cleaning facilities, fleet storage areas for buses, and outdoor liquid container storage.

Additional water quality standards or pretreatment measures may be required in addition to those included in the water quality criteria in order to remove potential pollutant loadings from entering either groundwater or surface water systems.

Pretreatment measures include:

Stormwater Hot Spots	Minimum Pre-Treatment Options
Vehicle service and maintenance facilities	1. Oil/Water Separators/Hydrodynamic Devices 2. Use of Drip Pans and/or Dry Sweep Material under Vehicles/Equipment 3. Use of Absorbent Devices to Reduce Liquid Releases 4. Spill Prevention Response Program
Fleet storage areas for buses	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
Vehicle Fueling Stations	1. Oil/Water Separators/Hydrodynamic Devices 2. Water Quality Inserts for Inlets 3. Spill Prevention Response Program
Vehicle equipment cleaning facilities	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
Outdoor liquid container storage	Spill Prevention Response Program

2.5.5 SITE PLAN REVIEW

This policy is to establish requirement to submit a site plan for review as required by the MDEQ NPDES Phase II Stormwater Discharge Permit. MMCS will prepare and submit a written application, including a site plan for review and approval of post-construction stormwater runoff BMPs, for all new construction or redevelopment projects where the area of disturbance exceeds one (1) acre. The application will be completed in a form and manner as prescribed by the local municipality or governing unit in which the property is located. The site plan will be reviewed by Genesee County and the appropriate local municipal, county, state or other governmental agency. MMCS will submit all proposed construction projects to Genesee County for approval.

The goal of the site plan review is to:



- Minimize clearing and grading.
- Protect waterways.
- Limit soil exposure.
- Protect steep slopes and cuts.

2.5.6 LONG-TERM OPERATION & MAINTENANCE OF STORMWATER CONTROLS

MMCS will identify all stormwater controls and mechanisms for all new construction or redevelopment projects where the area of disturbance exceeds one (1) or more acres. MMCS will develop “BMP Operation and Maintenance” guidance manuals for each property, including:

- Develop a map of each facility identifying the location and type of structural controls, if any exist.
- Develop a guidance manual that will provide a listing of structural controls including a site diagram showing the location of each control, instructions for inspection and operation, and the inspection and/or maintenance schedules for each control mechanism.
- Stormwater runoff facilities, after construction and approval, shall be maintained in good condition, in accordance with the approved storm water plan.
- Update and revise the stormwater structural controls on facility site diagrams as identified during scheduled inspections or within 30 days following the completion a new facility or reconstruction/redevelopment site project.

The Director of Finance will ensure that local work instructions are developed based on BMP and O&M Guidance Manuals. MMCS trained staff or certified contractors will conduct routine inspection of all identified structural controls and complete maintenance, repair, or replacement as necessary.



2.5.7 POST CONSTRUCTION STORMWATER MANAGEMENT-BMP TABLE

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #1 Post Construction Standards	Ensure post-construction channel protection standards and water quality treatment standards are met.	As Necessary	All applicable site plan are reviewed by the appropriate local municipal, county, state or other governmental agency.	Copy of site plan.
BMP #2 Site Specific	MMCS will review construction plans for sites with known soil and/or groundwater contamination, including potential “hot spots” and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria.	As Necessary	Reduce or eliminate discharge of pollutants during construction on contaminated sites.	Documentation of additional stormwater controls.
BMP #3 Site Plan Review	Prepare and submit a written application, including site plan for construction of storm water management systems for all new construction or redevelopment projects.	As Necessary	All applicable site plan are reviewed by the appropriate local municipal, county, state or other governmental agency.	Copy of reviewed plans.
BMP #4 Operation & Maintenance	All MMCS owned sites will have an O&M guidance manual including location, description, instructions for inspection, repair, and maintenance, and a schedule for each BMP.	O&M guidance manuals will be evaluated for completion in the 2016-17 fiscal year. Within 30 days of following the completion a new facility or reconstruction/redevelopment site project.	Ensure O&M requirements are met for all MMCS owned BMPs.	Keep copies of BMP O&M plans and all inspection, maintenance, and repair reports conducted by staff or contractors.



2.6 Pollution Prevention & Good Housekeeping Program

Develop, implement, and ensure compliance through a program of operation & maintenance BMPs, with the ultimate goal of preventing or reducing pollutant runoff to the maximum extent practicable from operations that discharge stormwater to surface waters of the state.

2.6.1 POLLUTION PREVENTION & GOOD HOUSEKEEPING PROGRAM OBJECTIVES

- a. Maintain an up-to-date inventory of owned facilities and stormwater structural controls.
- b. Update and revise inventory of stormwater structural controls when necessary.
- c. Assess each facility for the potential to discharge pollutants.
- d. Develop an SOP (SWPPP) for all facilities with a high potential for pollutant runoff.
- e. Identifying BMPs currently implemented or to be implemented to prevent or reduce pollutant runoff at each facility with medium and lower potential to discharge.
- f. Prioritize catch basins/manholes for maintenance and cleaning.
- g. Schedule for routine catch basin/manhole inspection, maintenance and cleaning.
- h. Provide the geographic location of stormwater structures.
- i. Procedure for dewatering, storage and disposal of materials extracted from storm sewer cleaning.
- j. Schedule for inspecting and maintaining storm water controls.
- k. New structural controls to be designed and implemented in accordance with post-construction stormwater runoff control performance standards.
- l. Best management practices for operation and maintenance activities.
- m. Procedure for street sweeping.
- n. Procedure for pesticide application.
- o. Training.
- p. Contractor requirements and oversight.

It is the ultimate goal of MMCS to prevent and reduce pollutant/contaminant runoff from MMCS facilities to the maximum extent practicable. All BMPs are implemented at all low, medium and high priority facilities.



2.6.2 STRUCTURAL CONTROL INVENTORY & SCHEDULE TABLE

All structural controls will have routine inspection, maintenance schedules, and long-term procedures which adequately control, to the maximum extent practicable, pollution removal and control. Structural control effectiveness will be determined based on the results of these inspections and repaired, upgraded, or replaced as indicated.

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Batterbee Park 12701 North Saginaw Street, Mount Morris, Michigan 48458	Low	Catch Basins	1	Inspect Annually, Clean Once per Permit Cycle
		Open Pipe Outlet	12	Inspect Annually, Maintain as Needed
		Drainage Receptor	11	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	8	Inspect Annually, Maintain as Needed
Elisabeth Ann Johnson High School 8041 Neff Road, Mount Morris, Michigan 48458	Medium	Catch Basin/Manholes	50	Inspect Annually, Clean Once per Permit Cycle
		Infiltration Basin	2	Inspect Annually, Clean Once per Permit Cycle
		Flow Splitter	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Open Pipe Outlets	3	Inspect Annually, Maintain as Needed



Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed
Montague Elementary School 344 Mount Morris Street, Mount Morris, Michigan 48458	Low	Catch Basin	5	Inspect Annually, Clean Once per Permit Cycle
		Infiltration Basin	3	Inspect Annually, Clean Once per Permit Cycle
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed
Moore Elementary School 1201 Wisner, Mount Morris, Michigan 48458	Low	Catch Basins	2	Inspect Annually, Clean Once per Permit Cycle
		Open Pipe Outlet	3	Inspect Annually, Maintain as Needed
		Drainage Receptor	4	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	3	Inspect Annually, Maintain as Needed
		Detention Pond	1	Inspect Annually, Maintain as Needed



Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed
Mt. Morris Education & Community Center 1000 East Mount Morris Road, Mount Morris, Michigan 48458	Low	Catch Basin/Manholes	8	Inspect Annually, Clean Once per Permit Cycle
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed
Mount Morris Middle School & Administration Building & Transportation and Maintenance Facility 12356 Walter Street, Mount Morris, Michigan 48458	High	Catch Basin/Manhole	31	Inspect Annually, Clean Once per Permit Cycle
		Trench Drain	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed



Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pinehurst Early Elementary 1013 Pinehurst Boulevard, Mount Morris, Michigan 48458	Low	Catch Basins/Manholes	11	Inspect Annually, Clean Once per Permit Cycle
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Open Pipe Outlet	3	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		SEMCOG Posters	1-3	Replace as Needed
		Illicit Discharge Reporting Numbers Poster	1	Replace as Needed



2.6.3 STRUCTURAL BMP OPERATION & MAINTENANCE WASTE DISPOSAL PROCEDURES

Waste materials generated from operation, maintenance, and cleaning activities associated with storm sewer systems has typically been discharged back into the storm sewer system. This type of discharge is unauthorized per Part 31, Water Resources Protection (Part 31) of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) and is therefore illegal. The combined solid and liquid waste stream (solid/liquid waste) from cleaning storm sewer systems is legally defined as “Liquid Industrial Waste” pursuant to Part 121, Liquid Industrial Wastes (Part 121) of NREPA.

MMCS will ensure that all waste materials generated during operation and maintenance of structural stormwater controls are properly characterized, transported, and disposed as required under State of Michigan PA 451 Part 111 (hazardous wastes), Part 121 (liquid industrial wastes), and Part 115 (solid wastes). At a minimum, the following procedures will be implemented for wastes generated from cleaning or maintaining storm sewer structural controls.

Structural BMP Operation & Maintenance Waste Characterization

Prior to conducting cleaning or maintenance to storm sewer structural controls, a certified stormwater operator will complete a waste generation determination. This determination will include a visual inspection of the structure and identification of any waste materials to be generated during the cleaning or maintenance process. The certified operator will document a description of materials currently in the structure and other observations used to determine if potential contaminants are present.

Visual observations and physical characteristics to be examined and documented as part of the waste characterization protocols include identification or the presence of:

- Oil or petroleum sheens
- Sedimentation or solids
- Odors
- Color
- Staining
- Vegetation conditions
- Floatables
- Other damage to the structure or observations identifying potential contaminants

Visual observations will be recorded and an assessment completed determining if additional evaluation or testing will be required prior to removal of the wastes. Contaminated materials will be characterized using physical & chemical analysis as required to determine if the resulting wastes are hazardous wastes regulated under part 111 of PA 451 (NREPA). Non-hazardous contaminated materials will be removed and managed as “Liquid Industrial Waste” as required under part 121 of PA 451 (NREPA).

Waste Disposal Methods for Non-Contaminated Materials

Non-contaminated waste materials generated during cleaning or maintenance of storm sewer structures will be properly disposed using one of the following methods:



1. Have the waste transported to drying beds to separate the solid/liquid waste. This is usually performed at a publicly owned treatment plant or at a privately owned permitted facility where the liquid portion of the waste stream is separated from the solids and treated.
2. Request permission from the local wastewater treatment plant operator to discharge the combined solid/liquid waste into the sanitary system. Most treatment plants will require pre-treatment prior to the discharge. All applicable local ordinance provisions must be followed.
3. When conducting catch basin maintenance activities where the above options are not available, the following method can be used as long as there are no discharges to surface waters during dry weather conditions.
 - Conduct visual inspection to ensure the water in the sump has not been contaminated. If necessary, collect a grab sample of the water and look for signs of contamination such as visible sheen, discoloration, obvious odor, etc. If there is any doubt of the quality of the water, it should be collected into a vacuum truck and treated as waste under Part 121 or Part 115 of PA 451 (NREPA).
 - Using a sump pump, or any other pumping mechanism, remove the majority of water in the sump of the basin without disturbing the solid material below. Do not use pumps connected to the vacuum truck's holding tank.
 - The clear water may then be directly discharged to one of the following:
 - o Sanitary system (with prior approval from local sewer authority).
 - o Curb and gutter.
 - o Back into the storm sewer system as long as it is contained within the system during dry weather condition to ensure no discharge into surface water.
 - o Applied to the ground adjacent to the catch basin (evenly distributed at a maximum rate of 250 gallons/acre/year).
 - The remaining liquid/solid in the sump should be collected with a vacuum truck and disposed of off-site in accordance with MI P.A. 451 Parts 115 or 121.

MMCS does not currently own or operate storm sewer cleaning or transportation equipment. If MMCS contracts with a private contractor to transport liquids generated from cleaning of catch basins or other structures, that contractor must be registered and permitted as a Uniform Liquid Industrial Waste Hauler under the provisions of HMTA.

Waste Disposal Methods for Contaminated Materials

Waste materials generated during operation and maintenance of storm sewer systems found or suspected to be contaminated with pollutants or hazardous substances will be characterized, packaged, marked, labeled, stored, transported, and disposed as a regulated waste under Part 121 or Part 115 of PA 451 (NREPA).



2.6.4 POLLUTION PREVENTION/GOOD HOUSEKEEPING –BMP TABLE

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #1 Structural Control Inventory	Provide an up to date inventory of the number of stormwater structural controls for each facility (i.e. catch basins, detention ponds). Update facilities potential to discharge pollutants (high, medium, low) following the update.	Initial Update Completed Further Updates as Needed Within 30 days following the completion a new facility or reconstruction/redevelopment.	100% of stormwater structural controls inventoried.	Maintain list of inventory and potential to discharge priority level. Submit updated list with progress report, noting if priority levels have changed.
BMP #2 SWPPP development & implementation (SOP)	Develop a “Stormwater Pollution Prevention Plan (SWPPP)” for maintenance, transportation, and storage facilities/Implement policies & procedures.	Developed & Implemented Inspections required every 6 Months	SWPPP completed and 100% of inspections implemented.	Copy of SWPPP.
BMP #3 Stormwater Structural Control Inspections	Visually inspect stormwater controls identified on facility maps.	(Inspections detailed in Section 2.6.2)	Routine schedule implemented and inspections reviewed by stormwater manager.	Maintain inspections form/reports regarding inspections.
BMP #4 Review for BMP’s Implemented	While inspecting stormwater controls, review the site for BMPs currently implemented to prevent or reduce pollutant runoff at each facility; such as storm drain stencils, garden areas, areas cleaned, areas repaired, SEMCOG poster placement, Illicit discharge education posters, and spill kits.	Annually	Annual inspections completed and reviewed by stormwater manager.	Documentation of inspection findings (number of posters, number of spill kits, inventory of gardens, pictures of stencils, pictures of spill kits).



BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #5 Prioritization of Storm Sewer Locations for Maintenance & Cleaning	Following the inspection, the stormwater controls should be prioritized for cleaning and maintenance. Prioritize locations based on (1) drainage structures that are designated as consistently generating the highest volumes of trash and/or debris, (2) areas with high amounts of build-up sediment, (3) areas of significant cracking or sinkholes.	Annually	Prioritization locations identified.	Copy of prioritization.
BMP #6 BMP Operation & Maintenance (O&M) Guidance Manuals	Maintain existing schedules, maps and inspection reports in current Operation & Maintenance Manuals. Development of manuals for all facilities.	Annually	Manuals reviews and updated annually.	Manuals up to date and available for review.
BMP #7 Roadways & Parking Lots	Storm drains stenciled to prevent disposal of wash water into storm drains.	As Needed	Storm drain stencils inspected and maintained as need.	Copy of work order. Photos of stenciling.
BMP #8 Cold Weather Operations	Proper salt storage management. Maintain storage bags and equipment in good working condition.	Ongoing	Continue proper salt storage and management as previously implemented.	Copy of SWPPP comprehensive inspection report.
BMP #9 Vehicle Washing	Vehicle washing shall be performed at a commercial auto wash facility.	Ongoing	100 % of applicable staff trained on were to wash vehicles.	Copy of sign in sheets and Agenda (if available).
	Alternatively, rinse grass from lawn care equipment on permeable (grassed) areas.		100 % of applicable staff trained on were to wash vehicles.	Copy of sign in sheets and Agenda (if available).
	School car wash fundraising events will not be permitted on school grounds.		Notice sent to staff regarding policy.	Copy of email or policy.



BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #10 Vehicle Maintenance	All drains within maintenance garages will be dye tested to assure that no drains flow into the separate storm sewer system.	Completed	100% of floor drains inspected.	Copy of inspection report.
	Oil-water separators will be inspected routinely and serviced as necessary to maintain efficiency.	Annually	Oil-water separators cleaned and functioning properly.	Copy of invoices or shipping papers.
	Recycle used motor oil, diesel oil, other vehicle fluids, and vehicle parts whenever possible.	As Needed	Reduction in amount of disposed material and amount of material shipped for off-site disposal.	Copy of invoices or shipping papers.
BMP #11 Stream Bank Inspection	Conduct stream bank inspections. Inspect banks along properties to identify erosion or potential erosion problems and check for water clarity conditions. Properly maintain buffer areas.	Annually	100% of bank inspections completed.	Copy of inspection sheets/reports.
BMP #12 Land Disturbance	Place temporary stockpiled material away from storm drains, and berm or cover stockpiles to prevent material releases into the storm drain. Protect against sediment flowing into drains.	As Needed	100 % of applicable staff trained.	Copy of sign in sheets and Agenda (if available).
BMP #13 Street Sweeping	Routine inspection of streets and parking lots; clean as needed.	Bimonthly	Inspections completed.	Copy of work order or schedule.
	Street sweeping conducted by a professional sweeping company.	As Needed		Copy of invoice or disposal documentation.



BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment
BMP #14 Vegetated Properties (Pesticides)	MMCS requires all contracted personnel who participate in the application of pesticides will be trained and licensed by the State of Michigan under the Commercial Pesticide Application Certification Program for relevant categories as applicable, to prevent or reduce pollutant runoff from vegetated land.	Ongoing	Application of pesticides will only be completed by trained and licensed applicators.	Documentation of in-house staff license or copy of contractor receipt.
BMP #15 Contractor Oversight	MMCS requires contractors to comply with pollution prevention and good housekeeping BMPs. MMCS will complete contractor notification, pre-project meeting and periodic inspections to provide oversight to ensure compliance.	As Needed	Contractors training and informed of pollution prevention and good housekeeping techniques.	Copy of sign in sheets, pre-project meeting notes or inspections.
	Direct contractors to online "Contractor Training" prior to conducting work. [All Stormwater Training is outlined in Section 3.0 Training]			
BMP #16 Training	Pollution prevention and good housekeeping training.	Once per permit cycle or during the 1 st year of employment	Goal of providing training to maintenance staff who work for MMCS. [All Stormwater Training is outlined in Section 3.0 Training]	Copy of sign in sheets and Agenda (if available).
BMP #17 Pollution Prevention & Good Housekeeping Activities Review	Summary of annual activities for the "Pollution Prevention and Good Housekeeping" component.	Annually	Annual review of DPPP performed. Maintain copy of DPPP annual review. Determine the level of district involvement and identify areas of improvement.	Maintain copy of DPPP annual review and evaluation information for progress reporting.



2.7 Curriculum

Mount Morris Consolidated Schools has conducted a review of the current State of Michigan K-12 science curriculum to determine which topics and grade levels have applicability toward the goals of the SWMP. The Mount Morris Consolidated Schools K-12 science curriculum has been developed as required under Michigan Department of Education “Grade Level Content Expectations”. Mount Morris Consolidated Schools encourages schools to incorporate watershed awareness, pollution prevention, recycling, ecology, and energy conservation into the core curriculum throughout the district.

The current K-12th grade Earth Science curriculum provides students with a wide range of topics specifically related to this permit. A listing of current K-12 grade level curriculum topics including grade level, curriculum code, description, and any additional activities included in the specific course work is provided in the table below.

Stormwater Program Related Science Curriculum K-12th Grade

Grade	Code	Description
K	K-ESS3-3	Communicate solutions that will reduce the impact of humans on the land, water, air, and/or other living things in the local environment.
2	2-ESS1-1	Use information from several sources to provide evidence that Earth events can occur quickly or slowly
2	2-ESS2-2	Develop a model to represent the shapes and kinds of land and bodies of water in an area.
2	2-ESS2-3	Obtain information to identify where water is found on Earth and that it can be solid or liquid.
4	4-ESS2-1	Make observations and/or measurements to provide evidence of the effects of weathering or the rate of erosion by water, ice, wind, or vegetation
5	5-ESS2-2	Describe and graph the amounts and percentages of water and fresh water in various reservoirs to provide evidence about the distribution of water on Earth.
5	5-ESS3-1	Obtain and combine information about ways individual communities use science ideas to protect the Earth’s resources and environment.
6-8	MS-ESS2-4	Develop a model to describe the cycling of water through Earth’s systems driven by energy from the sun and the force of gravity.
6-8	MS-ESS3-1	Construct a scientific explanation based on evidence for how the uneven distributions of Earth’s mineral, energy, and groundwater resources are the result of past and current geoscience processes.



6-8	MS-ESS3-3	Apply scientific principles to design a method for monitoring and minimizing a human impact on the environment.
6-8	MS-ESS3-4	Construct an argument supported by evidence for how increases in human population and per-capita consumption of natural resources impact Earth's systems.
9-12	HS-ESS2-5	Plan and conduct an investigation of the properties of water and its effects on Earth materials and surface processes.
9-12	HS-ESS3-1	Construct an explanation based on evidence for how the availability of natural resources, occurrence of natural hazards, and changes in climate have influenced human activity
9-12	HS-ESS3-6	Use a computational representation to illustrate the relationships among Earth systems and how those relationships are being modified due to human activity.



3.0 Training

MMCS will provide education and training for applicable employees and contractors using a variety of methods depending on their specific job function. At a minimum, all applicable MMCS employees will be required to have general awareness training on the topics included in the PEP. All applicable MMCS employees will be required to attend or otherwise obtain general awareness training at least once per permit cycle or during the 1st year of employment.

MMCS has implemented a comprehensive staff training program based on each employee's participation and responsibilities under this program. The employee training program is categorized in three (3) separate levels summarized as follows:

LEVEL I TRAINING-General Awareness Training

Level I training is required for all district employees at least once every 5 years for current employees and during the 1st year of employment for new employees. General Awareness training is provided in the form of an 11-minute video produced by the Arch Environmental Group, Inc. titled **"When it Rains, It Drains...The Stormwater Question"**. This video is also used in various classrooms as part of ongoing science curriculum as requested by specific faculty members.

LEVEL II TRAINING-General Awareness, Pollution Prevention & Good Housekeeping, and Illicit Discharge Reporting

Level II training is required for all employees whose job responsibilities involve illicit discharge related activities, or indicate a potential to cause, witness, or report and illicit discharge or connection. This training includes the previously described video as well as a review of the District Pollution Prevention Plan and instruction on identification and notification of illicit discharges or connections. This training is provided to applicable transportation, maintenance, custodial, and food service employees.

LEVEL III TRAINING-Maintenance and Storage Facility Stormwater Pollution Prevention Plans, Lawn Maintenance, and Structural Control Inspection, Maintenance, and Repair Training

Level III training is provided in the form of videos, PowerPoint presentations, and hands-on training. This training will be provided to district supervisors, maintenance, and lawn service staff. Applicable employees with specific responsibilities under this program will be provided training at least once every three (3) years for current applicable employees or prior to conducting activities outlined in the SWMP.

LEVEL IV TRAINING (CONTRACTORS) – Contractor Training

Contractors employed by MMCS to conduct activities with a potential to impact water quality. Contractors training is provided in the form of an online video produced by the Arch Environmental Group, Inc. titled **"Stormwater Awareness & Pollution Prevention Training for Contracted Public School District Vendors & Employees"**.



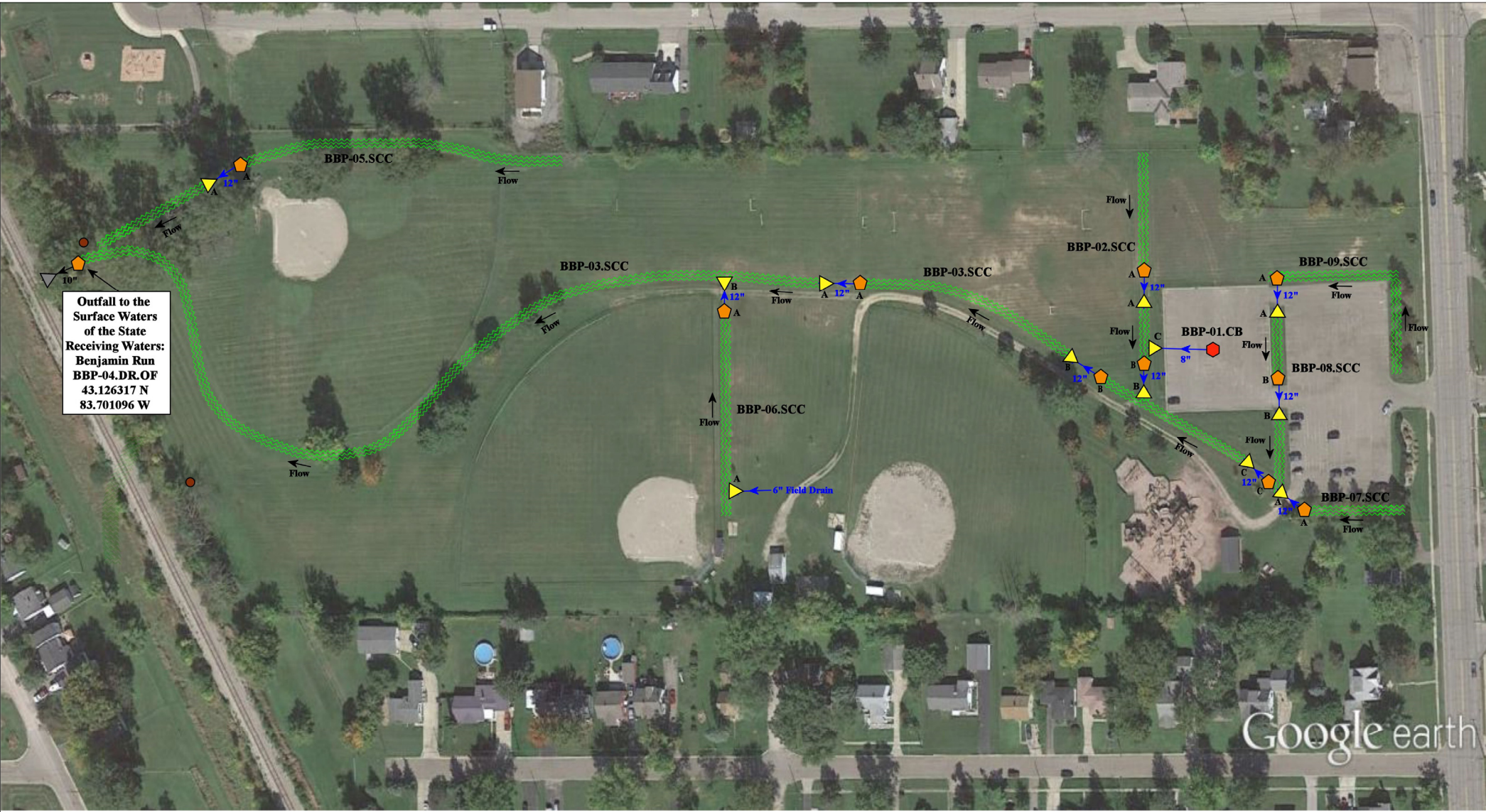
3.1 Training Table

BMP	Description	Measurable Goal	Target Audience	Timeframe
Level I Training	General Awareness Training	Record attendance with sign off sheets for each training session. MMCS will retain records of trainings for future review with regard to SWMP.	All district employees.	Once per permit cycle for current employees and during the 1 st year of employment for new employees.
Level II Training	General Awareness, Pollution Prevention & Good Housekeeping, and Illicit Discharge Reporting	Record attendance with sign off sheets for each training session. MMCS will retain records of trainings for future review with regard to SWMP.	In-house custodial, maintenance, transportation and food service employees.	Once during permit cycle current employees and during the 1 st year of employment for new employees.
Level III Training	General Awareness, Pollution Prevention & Good Housekeeping, Illicit Discharge Reporting, Maintenance and Storage Facility Stormwater Pollution Prevention Plans, Lawn Maintenance, and Structural Control Inspection, Maintenance, and Repair Training	Record attendance with sign off sheets for each training session. MMCS will retain records of trainings for future review with regard to the DPPP.	District supervisors, in-house maintenance, and lawn service staff.	Once every three (3) years within permit cycle for current applicable employees if conducting activities outlined in the DPPP.
Contractor Training	Stormwater specific training for on-site contractors.	Require stormwater-specific training for on-site contractors. MMCS will provide referral information for contractors to obtain stormwater education through private or state training resources. Additionally, the referral will notify contractors of the location of the current MMCS DPPP for review. Obtain records of training for future review of the DPPP.	Contractors employed by MMCS to conduct activities with a potential to impact water quality.	At the time of employment.



Attachment “A”

Site Stormwater Structure Maps



Outfall to the
Surface Waters
of the State
Receiving Waters:
Benjamin Run
BBP-04.DR.OF
43.126317 N
83.701096 W

Google earth

12701 N Saginaw St, Mt. Morris, MI 48458

- = Catch Basin
- ▲ = Open Pipe Outlet
- ◆ = Drainage Receptor
- = Sanitary

== Stormwater Conveyance Channel



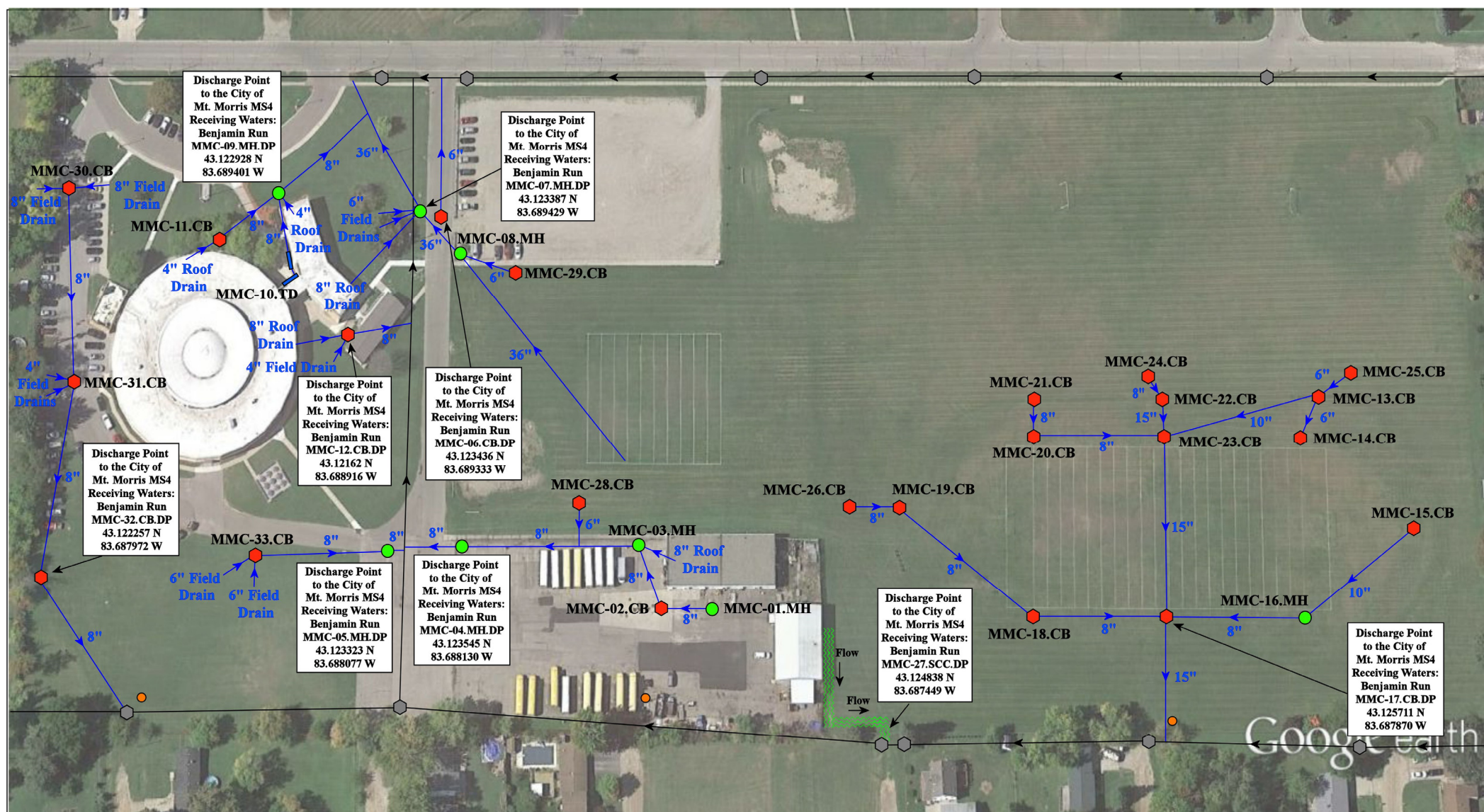
Batterbee Park

Mt. Morris Consolidated Schools

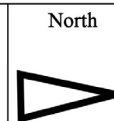


37720 Interchange Drive
Farmington Hills, MI 48335
Phone: 248-426-0165
Fax: 248-427-0305

Revision Date :	04/07/2015
Drawn by:	BJZ
Reviewed:	EV
Page #:	1 of 1
Scale:	Not to Scale



- ⬢ = Catch Basin
- = Manhole
- = Trench Drain
- = City MS4
- ~~~~~ = Stormwater Conveyance Channel
- = Sanitary Sewer



12356 Walter St. Mt. Morris, Michigan 48458

Mt. Morris Middle School, Administration
and Transportation Complex
Mt. Morris Consolidated Schools



37720 Interchange Drive
Farmington Hills, MI 48335
Phone: 248-426-0165
Fax: 248-427-0305

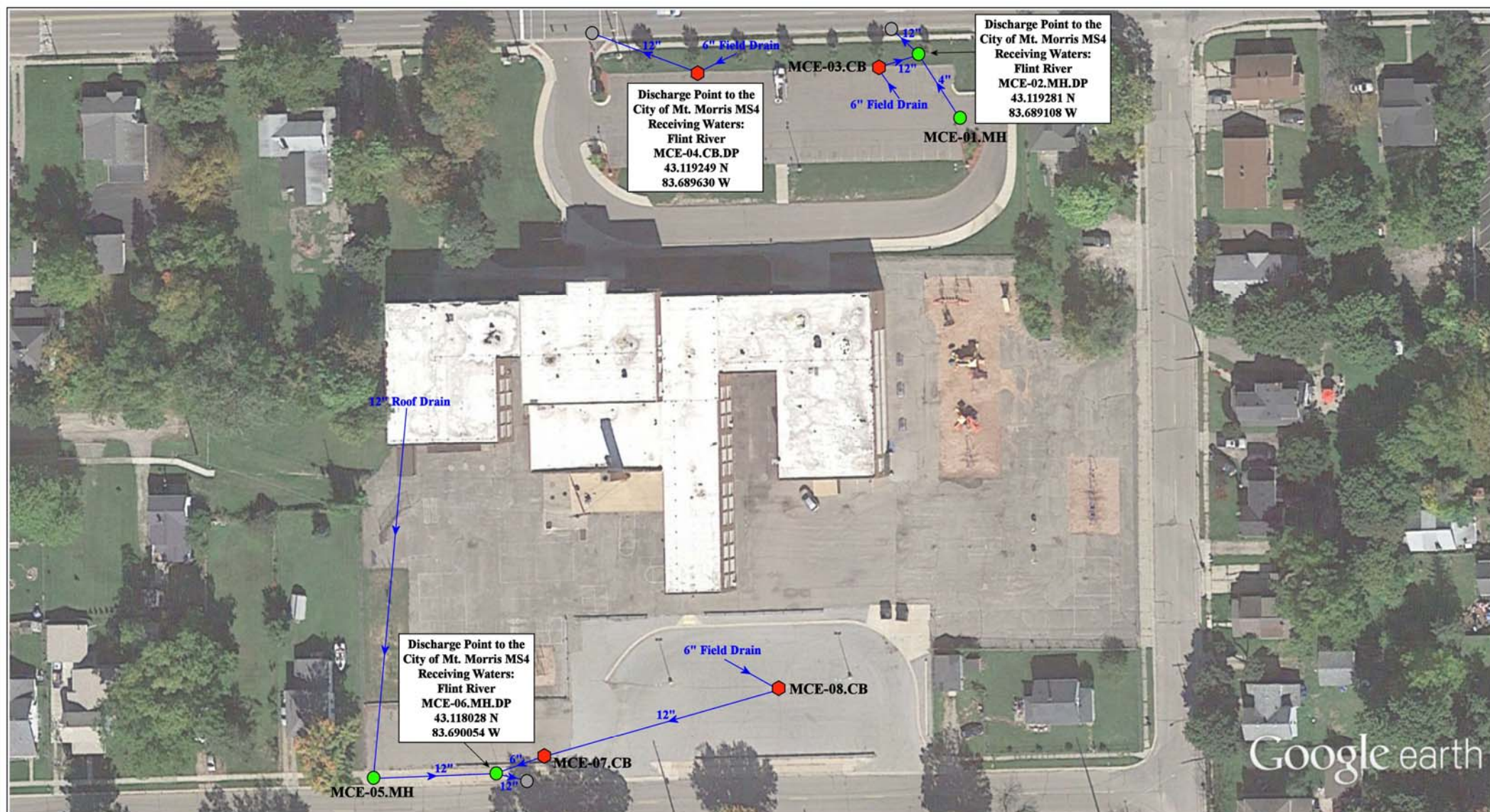
Revision Date :	6/12/2015
Drawn by:	BJZ
Reviewed:	NA
Page #:	1 of 1
Scale:	Not to Scale



Discharge Point
to the
Mt. Morris MS4
Receiving Waters:
Benjamin Run
PHE-15.MH.DP
43.129638 N
83.703266 W

Discharge Point
to the
Mt. Morris MS4
Receiving Waters:
Benjamin Run
PHE-16.SCC.DP
43.128221 N
83.700323 W

1013 Pinehurst Blvd, Mt. Morris, Michigan 48458			
Pinehurst Elementary School			
Mt. Morris Consolidated Schools			
		37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	
		Revision Date :	04/14/2015
		Drawn by:	BJZ
		Reviewed:	EV
		Page #:	1 of 1
		Scale:	Not to Scale



- = Catch Basin
- = Manhole
- = Offsite MS4



1000 E. Mt. Morris Road, Mt. Morris, Michigan 48458

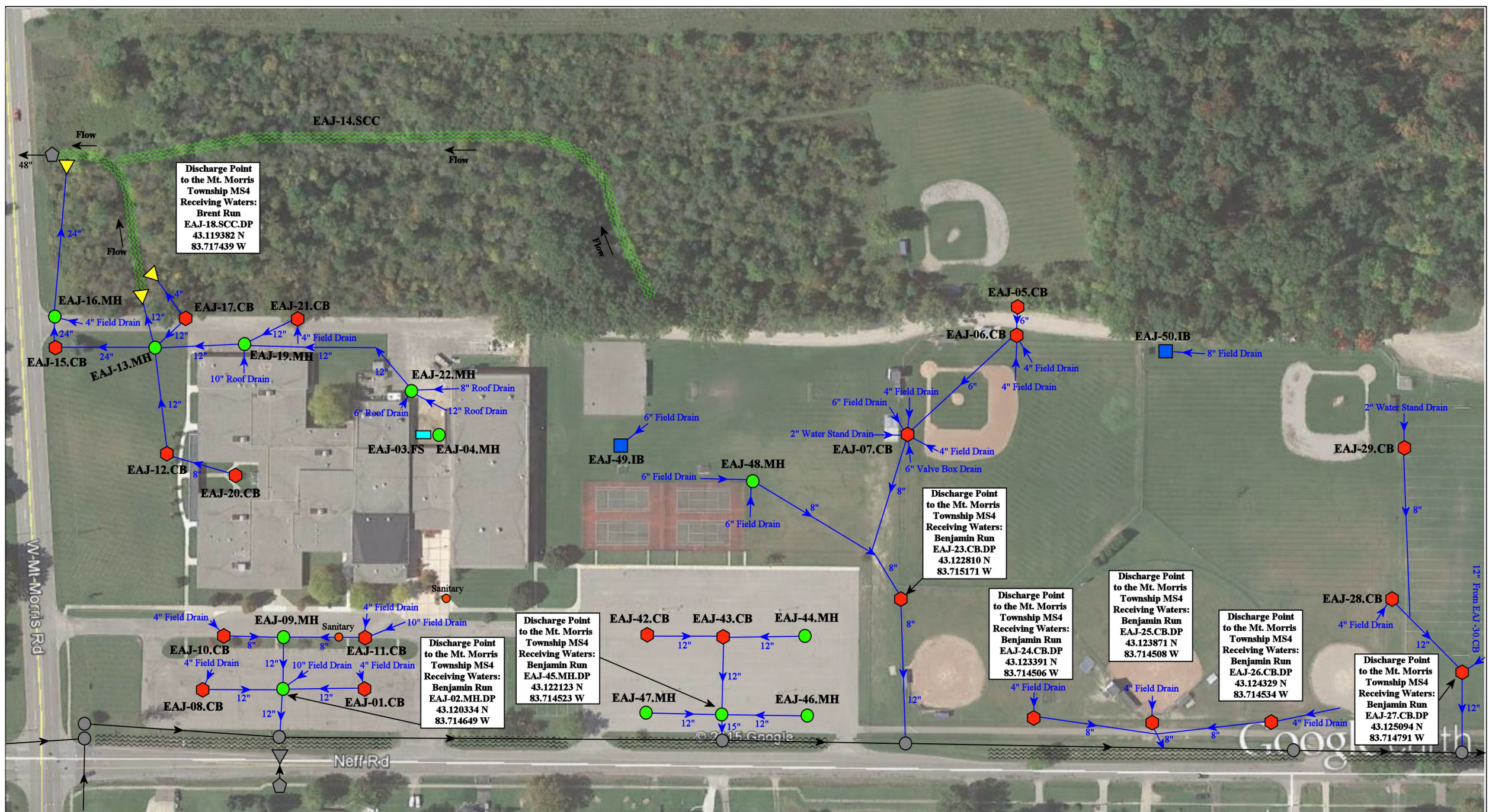
Education & Community Center

Mt. Morris Consolidated Schools

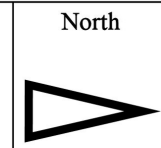


37720 Interchange Drive
Farmington Hills, MI 48335
Phone: 248-426-0165
Fax: 248-427-0305

Revision Date :	04/20/2015
Drawn by:	CMC
Reviewed:	EV
Page #:	1 of 1
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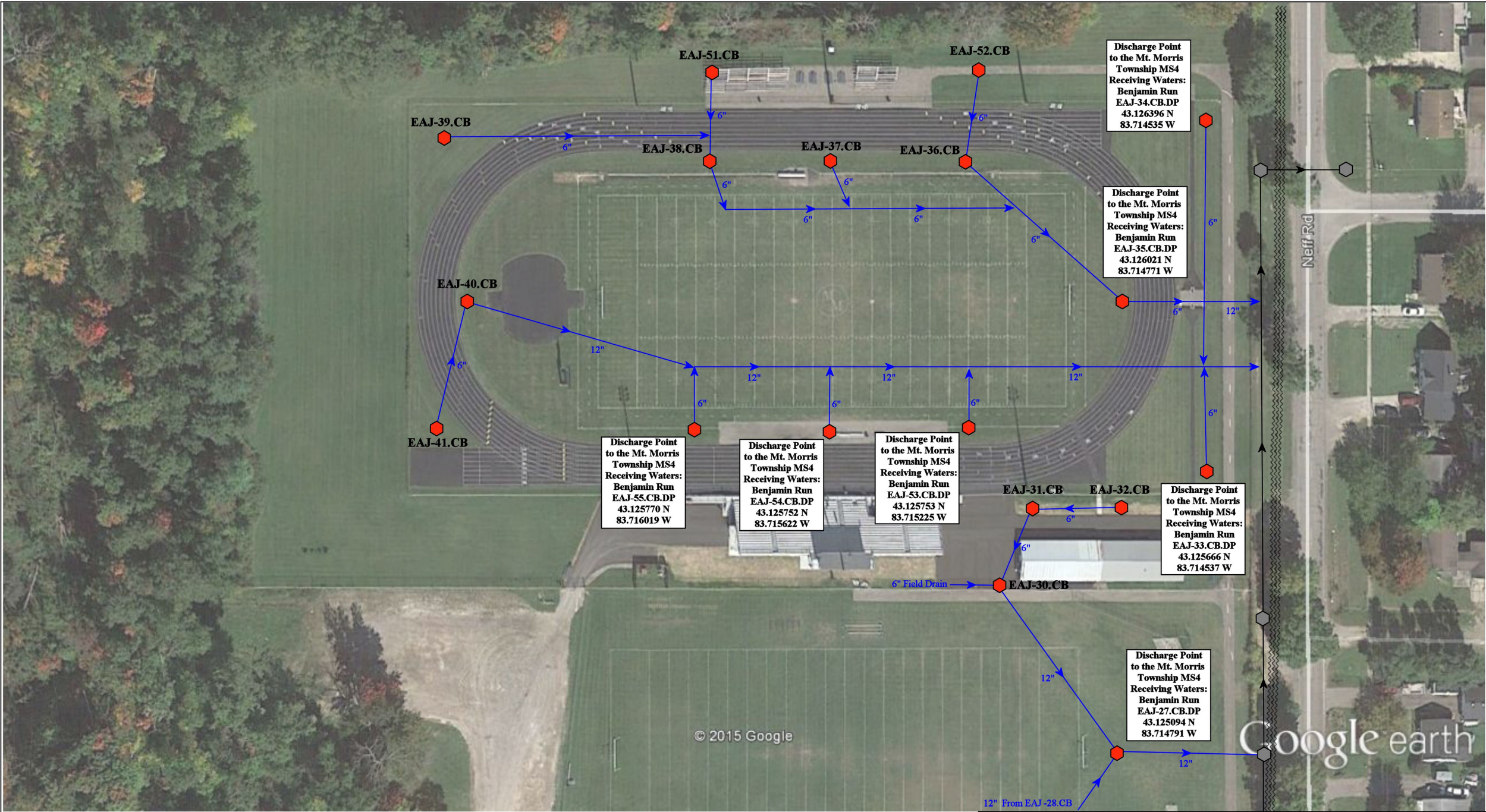


- ⬠ = Catch Basin
- = Manhole
- = Infiltration Basin
- ▭ = Flow Splitter
- ~~~~~ = Stormwater Conveyance Channel
- ▴ = Mt. Morris Township MS4



8041 Neff Rd Mt Morris, Michigan 48458

Elisabeth Ann Johnson High School Mt. Morris Consolidated Schools  37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Revision Date :	9/30/2015
	Drawn by:	BJZ
	Reviewed:	LK
	Page #:	1 of 2
Scale:		Not to Scale



8041 Neff Rd Mt. Morris, Michigan 48458		Revision Date :	10/1/2015
Elisabeth Ann Johnson High School		Drawn by:	BJZ
Mt. Morris Consolidated Schools		Reviewed:	LK
 37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Page #:	1 of 2	
	Scale:	Not to Scale	

 = Catch Basin

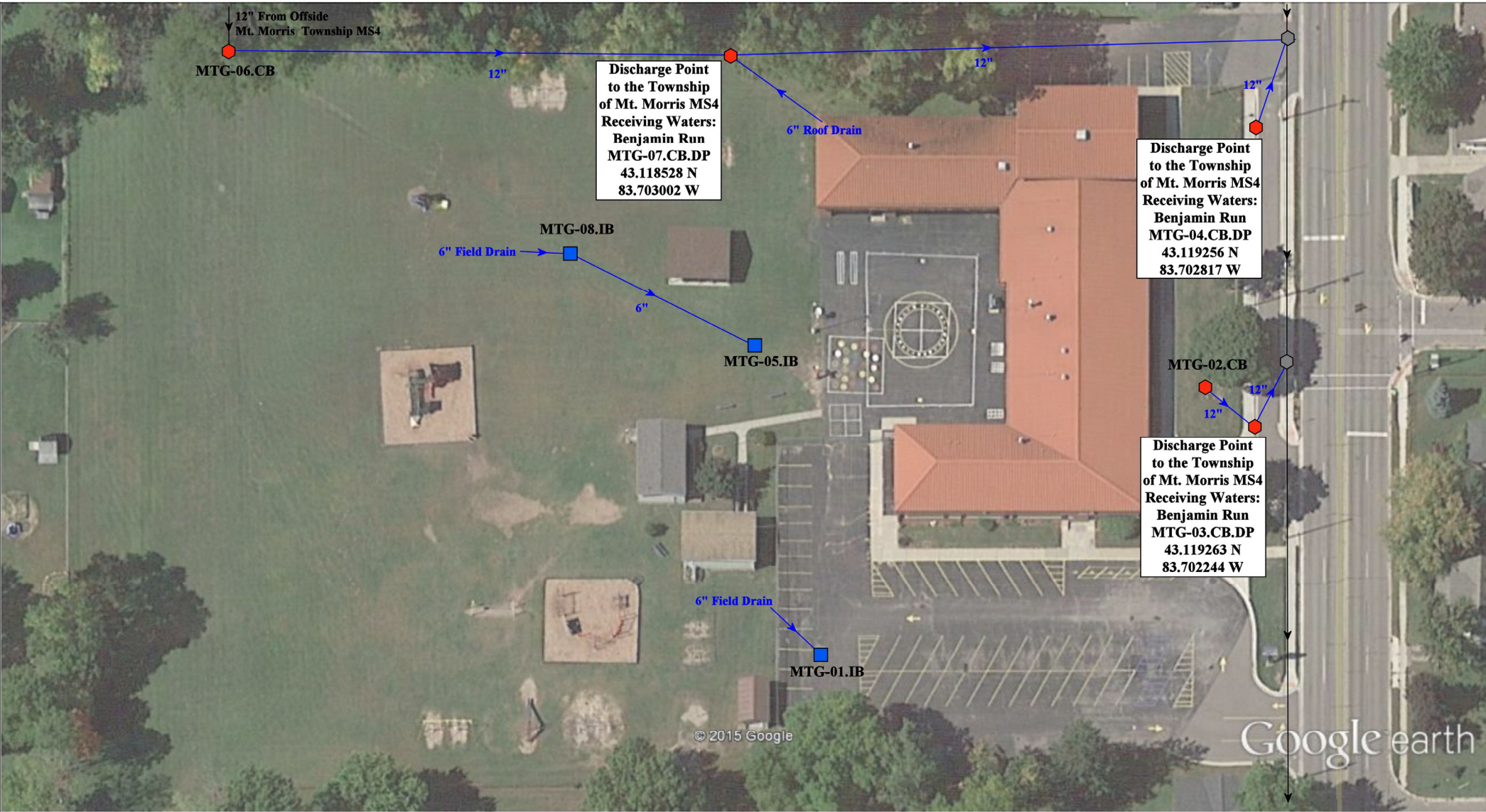
   = Mt. Morris Township MS4

 = Manhole

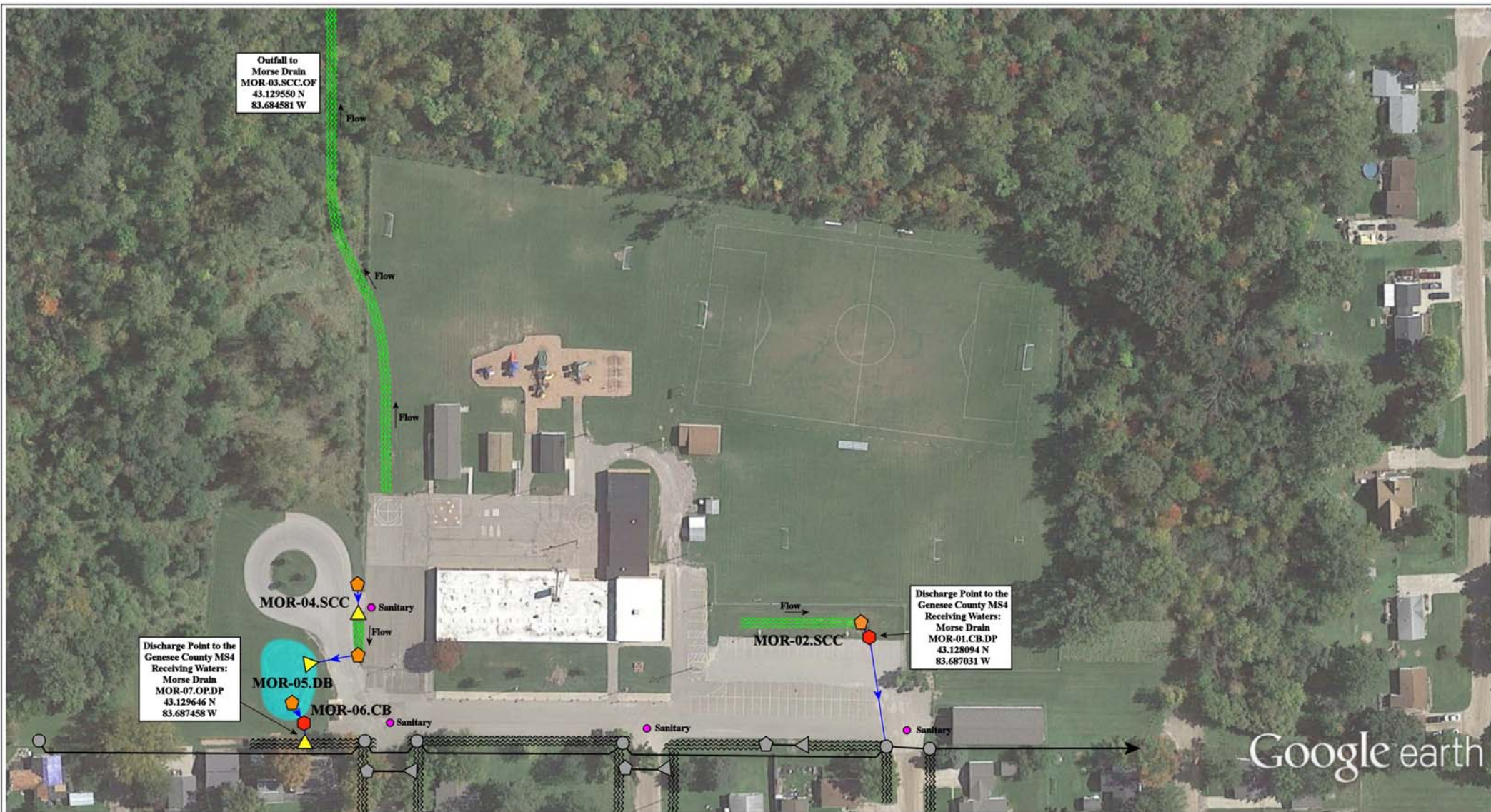
 = Stormwater Conveyance Channel

North

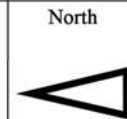




		344 Mt. Morris Street Mt. Morris, Michigan 48458	
 = Catch Basin  = Infiltration Basin  = Mt. Morris Township MS4	North 	Montague Elementary School	Revision Date : 10/1/2015
		Mt. Morris Consolidated Schools	Drawn by: BJZ
		 37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Reviewed: LK
			Page #: 1 of 1
			Scale: Not to Scale



- = Catch Basin
- ▲ = Open Pipe Outlet
- ◆ = Drainage Receptor
- = Offsite MS4
- = Detention Basin
- = Stormwater Conveyance Channel



1201 Wisner, Mt. Morris, Michigan 48458	
Moore Elementary School	
Mt. Morris Consolidated Schools	
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	
Revision Date :	04/27/2015
Drawn by:	CMC
Reviewed:	EV
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Scale:	Not to Scale



 = Stormwater Conveyance Channel

North



1201 Wisner, Mt. Morris, Michigan 48458

Moore Elementary School

Mt. Morris Consolidated Schools



37720 Interchange Drive
Farmington Hills, MI 48335
Phone: 248-426-0165
Fax: 248-427-0305

Revision Date :	04/22/2015
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Page #:	2 of 2
Scale:	Not to Scale



Attachment “B”

Illicit Discharge/Illegal Dumping Reporting Form

District Illicit Discharge/Illegal Dumping Reporting Form
Mt. Morris Community Schools

Date:_____ Time_____

Inspectors: _____

I. ORIGIN OF REPORT

1. Describe the reason for conducting the investigation.

- | | |
|---|---|
| ☐ Illicit Discharge Inspection (Routine) | ☐ Facility Staff |
| ☐ Citizen Complaint | |
| ☐ Other _____ | |

II. SOURCE

1. Describe location of source of discharge (company name, address, cross streets, physical features, etc.)

2. Describe the Source:

- | | |
|--|--|
| ☐ Residential | ☐ Transportation Facility |
| ☐ Construction Site | ☐ Custodial |
| ☐ Other _____ | |

3. Facility of the Source: _____

III. TYPE

1. Describe the type of material discharged:

- | | |
|--|---|
| ☐ Sanitary Leak/Spill | ☐ Paint Discharge |
| ☐ Dumpster Discharge | ☐ Cleaning Discharge |
| ☐ Unhardened Cement Discharge | ☐ Paint Discharge |
| ☐ Vehicle Repair | ☐ Vehicle Washing |
| ☐ Grey Water Discharge | ☐ Landscape Material Dumping |
| ☐ Cooling Water Discharge | ☐ Allowable Discharge |
| ☐ Other _____ | |

Provide Additional Information: _____

2. Other Sources:

- | |
|---|
| ☐ Illicit Connection |
| ☐ Construction Site |
| ☐ Other _____ |

IV. FOLLOW-UP AND ENFORCEMENT ACTIVITIES

1. Describe Corrective Actions: _____

2. Describe Enforcement Action:

- | | |
|---|---|
| ☐ None/Incident Resolved | ☐ Verbal Notice |
| ☐ Administrative Action | ☐ Cleaning Discharge |

3. Date Resolved: _____

4. Responsible Party

Signature: _____