Ann Arbor Public Schools
Stormwater Management Plan

Municipal Separate Storm Sewer System (MS4)
National Pollutant Discharge Elimination System (NPDES)
Stormwater Discharge Permit

PERMIT NO. MI0060234

Prepared By:

Arch Environmental Group, Inc.
37720 Interchange Drive
Farmington Hills, Michigan 48335

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Stormwater Management Program Plan

1.0 Introduction

Ann Arbor Public Schools is a public school district based in Ann Arbor, Michigan that owns or operates a regulated Municipal Separate Storm Sewer System (MS4). This Stormwater Management Plan (SWMP) has been developed to retain authorization to discharge stormwater to surface waters and reduce the discharge of pollutants from the MS4 to the Maximum Extent Practicable and protect water quality. Ann Arbor Public Schools will implement and enforce this SWMP to the Maximum Extent Practicable.

This Stormwater Management Plan commits to actions throughout the permit cycle. This SWMP includes measurable goals for Best Management Practices (BMP), focusing on the six minimum measures. Measurable goals describe the actions Ann Arbor Public Schools will take to implement each BMP and allow Ann Arbor Public Schools to evaluate progress toward meeting key objectives outlined in the following sections.

Ann Arbor Public Schools owns and operates thirty-three (33) properties within the boundaries of the "Ann Arbor Urbanized Area". All of Ann Arbor Public Schools properties are within the urbanized area based off the 2010 Census data, and the facilities include:

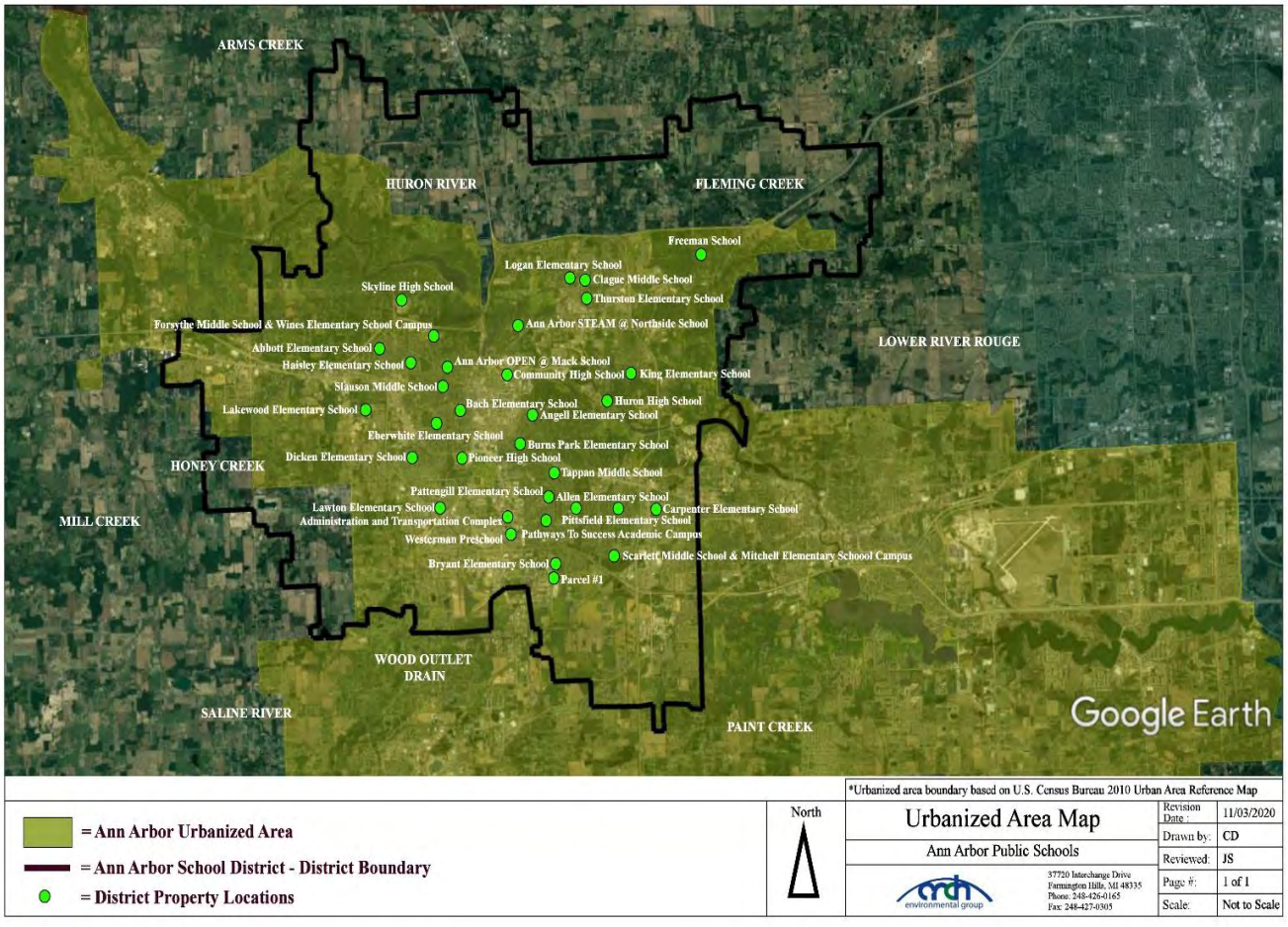
1. Abbot Elementary School, 2670 Sequoia Parkway, Ann Arbor, MI 48103
2. Administration & Transportation CAMPUS, 2555 S. State, Ann Arbor, MI 48104/2400 Boardwalk St, Ann Arbor, MI 48104
3. Allen Elementary School, 2560 Towner Blvd, Ann Arbor, MI 48104
4. Angell Elementary School, 1608 S. University, Ann Arbor, MI 48104
5. Ann Arbor Open @ Mack School, 920 Miller, Ann Arbor, MI 48103
6. Ann Arbor STEAM @ Northside School, 912 Barton Dr, Ann Arbor, MI 48105
7. Bach Elementary School, 600 Jefferson W, Ann Arbor, MI 48103
8. Bryant Elementary School, 2150 Santa Rosa, Ann Arbor, MI 48108
9. Burns Park Elementary School, 1414 Wells, Ann Arbor, MI 48104
10. Carpenter Elementary School, 4250 Central Blvd, Ann Arbor, MI 48104
11. Clague Middle School, 2616 Nixon Rd, Ann Arbor, MI 48105
12. Community High School, 401 Division N, Ann Arbor, MI 48104
13. Dicken Elementary School, 2135 Runnymede, Ann Arbor, MI 48104
14. Eberwhite Elementary School, 800 Soule Blvd, Ann Arbor, MI 48103
15. Forsythe Middle School, 1655 Newport Rd, Ann Arbor, MI 48103, Wines Elementary School, 1701 Newport, Ann Arbor, MI 48103 COMPLEX
16. Freeman School, 3540 Dixboro Lane, Ann Arbor MI 48105
17. Haisley Elementary School, 825 Duncan, Ann Arbor, MI 48103
18. Huron High School, 2727 Fuller Rd, Ann Arbor, MI 48105
19. King Elementary School, 3800 Waldenwood Dr., Ann Arbor, MI 48105
20. Lakewood Elementary School, 344 Gralake, Ann Arbor, MI 48103
21. Lawton Elementary School, 2250 S Seventh St, Ann Arbor, MI 48104
22. Logan Elementary School, 2685 Traver Blvd, Ann Arbor, MI 48105
23. Pathways To Success Academic Campus, 2800 Stone School Rd, Ann Arbor, MI 48104

24. Pattengill Elementary School, 2100 Crestland, Ann Arbor, MI 48104
25. Pioneer High School, 601 Stadium Blvd W., Ann Arbor, MI 48104
26. Pittsfield Elementary School, 2543 Pittsfield, Ann Arbor, MI 48104
27. Scarlett Middle School, 3300 Lorraine Ave, Ann Arbor, MI 48108, Mitchell Elementary School, 3550 Pittsview Dr., Ann Arbor, MI 48104 COMPLEX
28. Skyline High School, 2552 N Maple Rd, Ann Arbor, MI 48103
29. Slauson Middle School, 1019 Washington W, Ann Arbor, MI 48103
30. Tappan Middle School, 2251 Stadium Blvd, Ann Arbor, MI 48104
31. Thurston Elementary School, 2300 Prairie, Ann Arbor, MI 48105
32. Westerman Preschool and Family Center, 2775 Boardwalk, Ann Arbor, MI 48104
33. Parcel #09-12-10-304-099, 2081 East Ellsworth Road, Ann Abor, MI, 48103

1.1 Regulated Area

A map identifying the urbanized area within the Ann Arbor Public Schools urbanized area as defined by the 2000 Census is provided below in Map 1.

Map 1 – District Jurisdictional Boundary Map – Urbanized Area[1]



[1] Urbanized area boundary based on U.S. Census Bureau 2010 Urban Area Reference Maps.

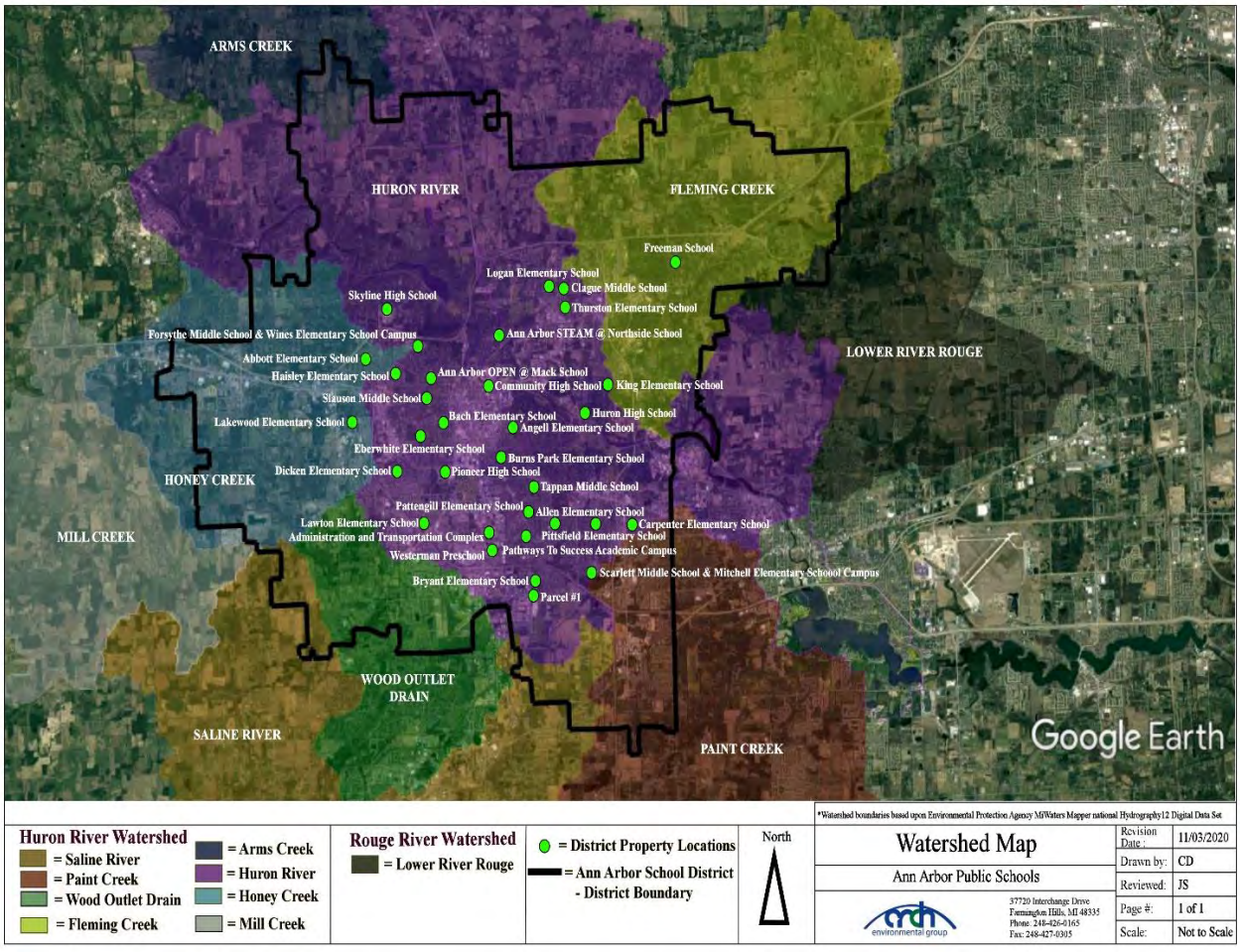
1.2 Outfalls & Discharge Points/ Receiving Waters

The permit authorizes the discharge of stormwater from municipal separate stormwater drainage systems to waters of the state from all existing outfalls or points of discharge.

Ann Arbor Public Schools is in the process of verifying outfalls that discharge directly into surface waters of the state and discharge points that discharge into other MS4 drainage systems. All outfall and discharge points shall be verified by June 30, 2021. The Ann Arbor Public Schools drainage system discharges directly or indirectly into the Fleming Creek, Honey Creek, Huron River, and Paint Creek watershed as detailed in Map 2 below.

Ann Arbor Public Schools has completed site specific storm sewer system maps which identify outfall and discharge point locations, discharge point source identification numbers, and receiving waters. A receiving water table and site specific storm sewer system maps are provided in Appendix "A". Any changes to the Ann Arbor Public Schools storm sewer system will be reflected on the storm sewer system maps and reported provided to the EGLE during progress reporting. The district watershed boundary map is provided in below in the map listed as "Map 2".

Map 2 – District Watershed Map[2]



[2] Watershed boundaries based on Environmental Protection Agency MiWaters Mapper National Hydrography Dataset Mapper 12-Digit Watersheds.

1.3 Enforcement Response Procedures

The Ann Arbor Public Schools properties are regulated as an MS4 under the NPDES Permit program. Environmental compliance staff members from Ann Arbor Public Schools have the authority to inspect and monitor stormwater-related activities on campus and require full compliance with all stormwater permit requirements. Enforcement of Ann Arbor Public Schools policies, procedures, and best management practices (BMPs) outlined in this SWMP is the responsibility of the Stormwater Program Manager or their designee. Any questions regarding this policy and procedure will be directed to the Stormwater Program Manager.

The primary role of the Superintendent or their designee is to ensure that the ERP is followed in a timely and consistent manner and track compliance issues and schedules. To achieve compliance, the following steps may be conducted:

1. Reviews reported violation.
2. Contact business or non-district individual responsible for the violation.
3. Ensures that compliance actions taken are consistent and timely.
4. Tracks instances of noncompliance.
5. Reviews compliance reports and schedules to ensure that appropriate enforcement actions are taken, and compliance goals are met.
6. Conduct follow-up inspection(s) to verify the violation has been corrected.
7. Legal action may be pursued for the most serious violations including where the response to previous enforcement actions is inadequate.

The tracking of instances of noncompliance 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
- Date Violation was Resolved

Information shall be placed into the Districts Noncompliance Enforcement Tracking Sheet.

This procedure will be reviewed on an annual basis by the Stormwater Manager for any updates. A copy of the SW Illicit Discharge Regulatory Policy is included with and an example of the Municipal Separate Storm Sewer System Noncompliance Enforcement Tracking Sheet in Appendix “B”.

2.0 Stormwater Management Program Plan (SWMP) Minimum Control Measures

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

- **Public Participation/Involvement Program (PPP)**

To promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants to stormwater to the maximum extent practicable.

- **Public Education Program (PEP)**
  To share components of the SWMP and encourage participation in its review and implementation.
- **Illicit Discharge Elimination Program (IDEP)**
  To detect and eliminate illicit connections and discharges to the MS4.
- **Construction Stormwater Runoff Control Program**
  To augment Part 91 rules dealing with soil erosion, offsite sedimentation and other construction-related wastes.
- **Post-Construction Stormwater Runoff Program**
  To address post-construction stormwater runoff from projects that disturb one acre or more, including projects less than one acre that are part of a larger common plan of development that would disturb one acre or more.
- **Pollution Prevention/Good Housekeeping Program**
  To minimize pollutant runoff to the maximum extent practicable from municipal operations that discharge stormwater to the surface waters of the state.

Each BMP includes a measurable goal, implementation schedule, and measure of assessment.

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. Ann Arbor Public Schools has partnered with the Huron River Watershed Council (HRWC) and the HRWC PPP Program. A copy of the HRWC Public Participation Program is in Appendix "C".

2.1.1 Public Involvement/Participation Program Objectives

The purpose of this Public Participation Program (PPP) is to facilitate the involvement of Municipal Separate Stormwater Sewer Systems (MS4s) in the watershed, and the general public in the revision of MS4 Storm Water Management Plans (SWMPs). This PPP is designed to involve all entities in the watershed with the authority, ability, and desire to carry out the implementation of SWMPs in commenting and implementing those plans.

2.1.2 Public Involvement& Participation Best Management Practices

1. Public Notice (HRWC BMP 1.1)
   - Provide electronic copies of SWMP to HRWC.
2. Public Access to Storm Water Management Plans (HRWC BMP 1.2)
   - Post SWMP on the Ann Arbor Public Schools Stormwater webpage.
3. Watershed Groups (HRWC BMP 1.3)
   - Attend the Middle Huron Partners Group Meetings.
4. SWMP Review (HRWC BMP 1.4)
   - Notification for comment on district stormwater webpage.
   - Ann Arbor Public Schools will review comments from the general public and EGLE.

2.1.3 Public Involvement & Participation Program (PPP) BMP Table

BMP	Implementation of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.1.3.1 Public Notice **(HRWC PPP BMP 1.1)**	Provide electronic copy of the final Ann Arbor Public Schools MS4 NPDES Permit to HRWC.	When approved by EGLE	Digital copy of the Ann Arbor Public Schools MS4 NPDES Permit provided to the HRWC.	Copy of email to HRWC with copy of Ann Arbor Public Schools MS4 NPDES Permit.	Ann Arbor Public Schools
BMP #2.1.3.2 Public Access to Storm Water Management Plans **(HRWC PPP BMP 1.2)**	Make SWMP available for public review through stormwater webpage.	Annually Throughout Permit Cycle	Availability of the SWMP for review, including contact information for comments.	Verify SWMP available on stormwater webpage, and track changes webpage posting of SWMP.	Ann Arbor Public Schools
	Contact information will be available on the stormwater webpages to forward comments regarding the SWMP.			Compile and track comments from the public.	
BMP #2.1.3.3 Participation Activities **(HRWC PPP BMP 1.3)**	Attend the Middle Huron Partners Group Meetings.	Ongoing Throughout Permit Cycle	Attend Huron Partners Group Meetings when available.	Reports of participation.	Ann Arbor Public Schools
BMP #2.1.3.4 SWMP Review **(HRWC PPP BMP 1.4)**	Ann Arbor Public Schools will review comments from the general public. Notification for comment on district stormwater webpage.	Annually Throughout Permit Cycle	SWMP comments reviewed and SWMP updated as necessary.	Compile and track comments from the public and EGLE.	Ann Arbor Public Schools

2.2 Public Education Program (PEP)

The PEP program is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in stormwater to the maximum extent practicable. The plan describes current and proposed best management practices (BMPs) to meet the minimum control measure requirements in a Public Education Plan (PEP). Ann Arbor Public Schools has partnered with the Huron River Watershed Council (HRWC) and the HRWC Stormwater Discharge Permit Application Collaborative Public Education Plan. A copy of the HRWC Stormwater Discharge Permit Application Collaborative Public Education Plan is in Appendix "C".

2.2.1 Public Education Program Objectives

A. Promote 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. Educate the public on and promote the benefits of green infrastructure and Low Impact Development.
J. Promote methods for managing riparian lands to protect water quality.
K. Identify and educate commercial, industrial, and institutional facilities about good housekeeping.

2.2.2 Public Education Program Procedure

To address each of the PEP requirements, the district will, individually or collaboratively, implement the following specific activities, which include a description, timeline, evaluation component, and the required topic that the activity meets. Activities will be completed with the involvement of responsible parties as noted in each activity description, and/or in cooperation with identified permitted communities.

Activity 1: Distribute Informational Materials
Activity 2: Distribute Community Watershed Calendar
Activity 3: Content in Community Newsletter, Website, or Social Media
Activity 4: Advertisements
Activity 5: Promote Water Resource Protection Workshops
Activity 6: Promote and Support Volunteer Stream Monitoring
Activity 7: Promote and Support Storm Drain Labeling
Activity 8: Promote Riparian Land Management Information
Activity 9: Conduct Outreach at Local and Regional Fairs and Community Events
Activity 10: Promote County-Wide Complaint Tracking and Response Systems.
Activity 11: Livingston County Household Hazardous Waste Reduction Program;
Not Applicable for Ann Arbor Public Schools

Activity 12: Livingston County Prescription Drugs and Personal Care Products Disposal Program;
Not Applicable for Ann Arbor Public Schools

Activity 13: Livingston County Electronic Waste Reduction Program;
Not Applicable for Ann Arbor Public Schools

Activity 14: Stream and River Crossing Road Signs Livingston and Washtenaw Counties;
Not Applicable for Ann Arbor Public Schools

Activity 15: Washtenaw County Community Partners for Clean Streams

Activity 16: Washtenaw County Pollution Prevention Inspections

Activity 17: Washtenaw County Issues of the Environment Radio Show

Activity 18: *Washtenaw County Environmental Excellence Awards*
Not Applicable for Ann Arbor Public Schools

Activity 19: *Washtenaw County Fats, Oils, and Grease and Litter Reduction*

Activity 20: *Washtenaw County River Safe Homes Program*

Activity 21: *Washtenaw County/Ann Arbor Residential Rain Garden Program*

Activity 22: *Washtenaw County Home Toxics Reduction Program*

Activity 23: *Washtenaw County Drug Take-Back Program*

2.2.3 Public Education Program Effectiveness

Ann Arbor Public Schools will collaboratively administer a broader survey once during the permit cycle in conjunction with Activity #2, the watershed community calendar. The survey's target audience will be residents of the permitted entities. The survey will measure public awareness of stormwater pollution and possible solutions, environmental attitudes, capacity, constraints, behaviors and, when appropriate, effectiveness of specific public education activities. The survey will primarily be conducted over the web with respondents recruited by mail and e-mail, through advertising, direct in-person contact and/or social media.

2.2.4 Public Education Program Periodic Progress Report

Ann Arbor Public Schools will provide documentation of PEP efforts, a summary of the evaluation of its effectiveness when appropriate.

2.2.5 Public Education Program BMP Table

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.1 Distribute Informational Materials **(HRWC PEP Activity #1)**	SEMCOG posters placed strategically throughout the district.	Ongoing Throughout Permit Cycle	Maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Number of posters placed throughout district.	Students, faculty and community	Ann Arbor Public Schools
	Place SEMCOG "7 Simple Steps to Clean Water" information on the district webpage.		SEMCOG "7 Simple Steps to Clean Water" information and links.	Confirm posting and update as necessary.		
	Place watershed specific information on the district webpage.		Supply watershed information and promote watershed membership information.	Confirm posting and update as necessary.		
	Include HRWC links on the district webpage.		Visible HRWC links on the stormwater webpage.	Confirm posting and update as necessary.		

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.2 Distribute Watershed Calendar **(HRWC PEP Activity #2)**	Place calendars in the lobby of the Administration Building as we as in the Main Office at school buildings.	Once per Year	Calendars typically feature a different tip each month for increasing public awareness of watershed issues and improving personal actions affecting the health of their watershed.	Calendars available to Students, faculty and community. Email HRWC to AAPS regarding date calendar sent.	Students, faculty and community	Ann Arbor Public Schools
	Ann Arbor Public Schools will collaboratively administer a broader survey once during the permit cycle in conjunction with the watershed community calendar.	Once per Permit Cycle	The survey will measure public awareness of stormwater pollution and possible solutions, environmental attitudes, capacity, constraints, behaviors and, when appropriate, effectiveness of specific public education activities. The survey will primarily be conducted over the web with respondents recruited by mail and e-mail, through advertising, direct in-person contact and/or social media.	Copy of survey provided.		
BMP #2.2.4.3 Content in Community Newsletters, Websites, Social Media **(HRWC PEP Activity #3)**	Place SEMCOG "7 Simple Steps to Clean Water" information on the district webpage.	Ongoing Throughout Permit Cycle	SEMCOG "7 Simple Steps to Clean Water" information and links.	Confirm posting and update as necessary	Students, faculty and community	Ann Arbor Public Schools

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.4 Local Newspaper and Web Advertisements **(HRWC PEP Activity #4)**	Include HRWC website link on the district webpage. https://www.hrwc.org/	Ongoing Throughout Permit Cycle	HRWC links visible on the stormwater webpage.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.5 Promote Water Resource Protection Workshop **(HRWC PEP Activity #5)**	Link to SEMCOG on the district webpage. https://semcog.org/	Ongoing Throughout Permit Cycle	SEMCOG links visible on the stormwater webpage.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.6 Promote and Support Volunteer Stream Monitoring **(HRWC PEP Activity #6)**	Link to the HRWC volunteer program on the district webpage. https://www.hrwc.org/volunteer/	Ongoing Throughout Permit Cycle	Volunteers assess habitat, water quality, and aquatic life in the Huron River and its tributaries as part of an ongoing scientific study.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.7 Promote and Support Storm Drain Labeling **(HRWC PEP Activity #7)**	Link to the HRWC Adopt-A-Storm drain on the district webpage. https://www.hrwc.org/volunteer/adoptastormdrain/	Ongoing Throughout Permit Cycle	The connection of storm drains to local waterways and the impacts of dumping pollutants into these drains.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.8 Promote Riparian Land Management Information **(HRWC PEP Activity #8)**	Link to Waterfront Wisdom, 7 Tips for creating and maintain a beautiful and healthy waterfront on the district webpage. https://www.hrwc.org/wp-content/uploads/HRWC-Waterfront-Wisdom-Web.pdf	Ongoing Throughout Permit Cycle	Educate on why riparian zones are important and educate on best management practices such as landscaping with native plants, buffer zones and minimizing impervious surfaces.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.9 Conduct Outreach at Local and Regional Fairs and Community Events **(HRWC PEP Activity #9)**	Forward HRWC event notices to school staff.	Three (3) Per year	Promote community Earth Day Festivals, Green Fairs, Huron River Days and others.	Maintain emails to staff.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.10 Provide County-Wide Complaint Tracking and Response Systems **(HRWC PEP Activity #10)**	Place How to Report/Hotline Numbers poster at district facilities. Poster describes illicit discharges and how to report illicit discharges.	Ongoing Throughout Permit Cycle	Place "How to spot illicit discharge/ How to Report-Hotline Numbers" posters placed in Receiving Rooms at each Ann Arbor Public Schools facility. Goal is to have one poster at each facility.	Annual review of postings. Number of posters placed throughout district.	Students, faculty and community	Ann Arbor Public Schools
	Post copy of AAPS SW Illicit Discharge Regulatory Policy on the district webpage.		Promotion of districts illicit discharge regulatory policy.	Confirm posting and update as necessary.		

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.11 Livingston County Household Hazardous Waste Reduction Program **(HRWC PEP Activity #11)**	Not applicable to Ann Arbor Public Schools.					
BMP #2.2.4.12 Livingston County Prescription Drugs and Personal Care Products Disposal Program **(HRWC PEP Activity #12)**	Not applicable to Ann Arbor Public Schools.					
BMP #2.2.4.13 Livingston County Electronic Waste Reduction Program **(HRWC PEP Activity #13)**	Not applicable to Ann Arbor Public Schools.					
BMP #2.2.4.14 Stream and River Crossing Road Signs Livingston and Washtenaw Counties **(HRWC PEP Activity #14)**	Not applicable to Ann Arbor Public Schools.					

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.15 Washtenaw County Community Partners for Clean Streams **(HRWC PEP Activity #15)**	Link to Washtenaw County Community Partners for Clean Streams on the district webpage. https://www.washtenaw.org/409/Community-Partners-for-Clean-Streams	Ongoing Throughout Permit Cycle	Promote protect water quality through on-site daily activities.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.16 Washtenaw County Pollution Prevention Inspections **(HRWC PEP Activity #16)**	Link to Washtenaw County Pollution Prevention information on the district webpage. https://www.washtenaw.org/1573/Pollution-Prevention	Ongoing Throughout Permit Cycle	Utilize and dispose of hazardous materials properly, thereby preventing environmental contamination.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.17 Washtenaw County Issues of the Environment Radio Show **(HRWC PEP Activity #X)**	Link to Washtenaw County radio show on the district webpage. https://www.washtenaw.org/341/The-Green-Room---TV-Radio	Ongoing Throughout Permit Cycle	Promotes public awareness of environmental issues, programs and news impacting our community.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.18 Washtenaw County Environmental Excellence Awards **(HRWC PEP Activity #18)**	Not applicable to Ann Arbor Public Schools.					

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.19 Washtenaw County Fats, Oils, and Grease and Litter Reduction **(HRWC PEP Activity #19)**	Link to Washtenaw County Fats, Oils, and Grease information on the district webpage. https://www.washtenaw.org/838/Fats-Oils-Grease	Ongoing Throughout Permit Cycle	Proper disposal of cooking fats, kitchen maintenance practices and recycling best management practices.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.20 Washtenaw County River Safe Homes Program **(HRWC PEP Activity #20)**	Link to Washtenaw County RiverSafe Homes information on the district webpage. https://www.washtenaw.org/632/Green-Living Link to Washtenaw County survey. https://www.surveymonkey.com/r/riversafe	Ongoing Throughout Permit Cycle	Protecting water quality around the home is easy to do and produces significant results.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.21 Washtenaw County/Ann Arbor Residential Rain Garden Program **(HRWC PEP Activity #21)**	Link to Washtenaw County Rain Garden information on the district webpage. https://www.washtenaw.org/647/Rain-Gardens	Ongoing Throughout Permit Cycle	Protecting water quality and preventing stormwater runoff through the use of rain gardens with native plants.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools
BMP #2.2.4.22 Washtenaw County Home Toxics Reduction Program **(HRWC PEP Activity #22)**	Link to Washtenaw County Home Toxics information on the district webpage. https://www.washtenaw.org/287/Home-Toxics-Center-Paint-Oil-Pesticides-	Ongoing Throughout Permit Cycle	The program seeks to address the environmental (including water quality) and public health effects resulting from improper handling and disposal of home toxics and is committed to reducing the use of home toxics and keeping citizens informed about the choices and responsibilities associated with purchasing, handling and disposing of toxic substances.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.23 Washtenaw County Drug Take-Back Program **(HRWC PEP Activity #23)**	Link to Washtenaw County "Don't Flush the Drugs" information on the district webpage. https://www.washtenaw.org/310/Medication-Disposal	Ongoing Throughout Permit Cycle	"Don't rush to flush," keep Rx Drugs and personal care products out of our water systems, proper medication disposal.	Confirm posting and update as necessary.	Students, faculty and community	Ann Arbor Public Schools

2.3 Illicit Discharge Elimination Program (IDEP)

The following Ann Arbor Public Schools Illicit Discharge Elimination Program is designed to identify, locate, prohibit and effectively eliminate illicit discharges, including discharges of sanitary wastewaters, to the permitted separate stormwater drainage systems. Ann Arbor Public Schools has partnered with the Huron River Watershed Council (HRWC) and the Memorandum of Understanding (MOU) and has agreed to abide by the MOU terms and Guidelines. A copy of the HRWC Memorandum of Understanding (MOU) is in Appendix "C".

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. Conduct routine dry weather screening.
7. Conduct source investigations if the source of an illicit discharge/connection is not identified by field screening.
8. Illicit discharge identification and elimination program performance & effectiveness.

2.3.2 Facility Site Storm Sewer System Maps and Lists

Ann Arbor Public Schools and consultants completed storm sewer system mapping at each of the owner operated properties identified in Section 1.0 of this Stormwater Management Plan. Storm sewer system maps include detailed information of the storm sewer system, including the locations of outfalls, points of discharge, and waters of the State that receive the discharges. The maps include a unique identification number for each storm sewer location identified on the map. Latitude and longitude are also noted for outfall and points of discharge location. Storm sewer system information will be maintained and updated and reported in Progress Reports.

Outfalls are discharge points where stormwater is discharged directly to surface waters of the state. Surface waters of the state include streams, lakes, ponds, county drains, and wetlands. Outfalls can be pipes, ditches, or even sheet flow from the facility. Some facilities will have an outfall where they can manually control the discharge.

Points of Discharge are discharge points where stormwater is discharged to a municipal or private separate storm sewer system. The visual assessment will be conducted as close to the point of discharge as possible before the storm water enters the municipal or private separate storm sewer system. Points of discharge include on-site catch basins and trench drains, in-street catch basins, and conveyances to roadside ditches.

Copies of the current facility storm sewer system maps are available at the Balas Administration Building, 2555 S. State, Ann Arbor, MI. Additionally, copies of the storm sewer system maps and a list of the outfalls and points of discharge are provided in Appendix "A".

2.3.3 Illicit Discharge Identification & Investigation Procedure – Field Observations

Ann Arbor Public Schools will conduct field observations for 100% of all outfalls and points of discharge locations during dry weather or more expeditiously if Ann Arbor Public Schools becomes aware of a non-stormwater discharge. Outfalls and points of discharge will be inspected by personnel trained to recognize all signs of possible illicit discharges. Dry weather screening will occur at least once every 5 years. Ann Arbor Public Schools next 5 year

dry weather screening cycle will be conducted in 2022 & 2023. Preferably, each outfalls and points of discharge will be inspected and evaluated following a period of at least 48-72 hours of dry weather.

The field observations will focus on visual inspection for the following:

- Outfall/point of discharge number
- Date/name of inspector
- Date of last rainfall
- Presence or absence of flow
- Presence or absence of standing water
- Water clarity and color
- Presence of oil sheen, trash and or other floatable materials
- Presence of bacterial sheen or slimes
- Excessive vegetative growth
- Odor
- Suds
- Floatables
- Presence of oil
- ❖ These characteristics are documented even if no flow is observed at the time of the inspection.

All field observations are detailed on a *"*Screening Inspection Log*"*. A copy of the Screening Inspection Log is provided in Appendix "D".

During field observations, in instances where the storm sewer outfalls and points of discharge is submerged or is connected to another enclosed sewer, the inspector will observe the nearest upstream storm sewer location or access point. Additionally, if dry weather flow is observed and it is obvious that an illicit discharge is present and the source of the discharge is obvious, Ann Arbor Public Schools will document the observations and the source and follow-up with applicable parties. Once a potential discharge is indicated at an outfall or point of discharge, additional inspection, field screening and source investigation activities are conducted.

2.3.4 Illicit Discharge Identification & Investigation Procedure – Field Screening & Source Investigation

At the time of the outfall or discharge point inspection, if dry weather flow is observed and the source is not obvious, the inspector who identified the discharge shall continue and conduct an upstream source investigation to determine the origin of the flow. The initial investigation includes visual and olfactory observations upstream from the outfall/point of discharge. If necessary, relevant indicator field screening or dye tracing will be conducted.

If the origin of the flow is not identified during the visual upstream investigation, a grab sample is collected from the discharge for indicator field screening analysis. Indicator monitoring/field screening is the secondary tool utilized for dry weather flow without obvious indicators such as very high turbidity, strong odors or visible discharge. Screening may include some or all of the indicator parameters:

- Temperature
- pH
- Detergents (i.e., surfactants)
- Chlorine
- Ammonia

- Turbidity
- Conductivity

Indicator parameters used to assess the dry weather flow shall be determined by the visual and olfactory observations and upstream source investigation.

Additional grab samples may be collected and delivered for external laboratory analysis, only if additional test parameters are required for the source investigation. The laboratory analysis parameters for grab samples are determined by the type of contamination suspected at the time of the source investigation.

Laboratory indicator parameters are based on EGLE guidance and as specified in the reference sources identified above. The selected laboratory parameters are:

- Fluoride
- Coliform
- E-coli
- Potassium
- Color
- Ammonia

The exact procedure for tracking the illicit discharge will depend on the particular facts of each incident. At the time of the identification of the observed dry weather flow, the flow will be tracked upstream until the source is isolated. Once the source has been isolated down to a specific site location, the work will become source confirmation. If the source is not confirmed, additional fieldwork, building evaluation, or dye testing may be necessary. Additional source investigations will be conducted within 30 days of the original observed dry weather flow.

Once the elimination of an illicit connection or illicit discharge has occurred, an elimination report detailing the corrective actions with attached work orders, photos or dye tracing results will be compiled for documentation purposes. Field inspections will continue until it can be reported that no illicit connection or discharge is present at that outfall/point of discharge.

2.3.5 Illicit Discharge/Connection Elimination Procedure

Illicit discharges and connections are identified through reporting, routine storm sewer system inspections and dry weather screening inspections. A “How to Spot Illicit Discharges” poster along with a “How to Report/Hotline Numbers” posters are placed in the receiving/custodial areas in each facility to report concerns. Ann Arbor Public Schools goal is to evaluate all 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., EGLE, local drain commission, etc.) within the required time period(s).

Ann Arbor Public Schools will evaluate and conduct the following actions regarding reported or observed illicit discharges/illegal dumping spills into the storm drainage system.

- If, in the opinion of Ann Arbor Public Schools, immediate action to address the suspected discharge is indicated, Ann Arbor Public Schools will ensure that the site is investigated within 7 days.
- Conduct source investigations, including applicable field screening to trace the origin of the materials within 30 days of the reported/observed illicit discharge.

  - Ann Arbor Public Schools will follow existing spill response procedures outlined in Section 2.3.10, under Spill Response, Policy & Procedures, if required.
- Once the source has been isolated down to a specific site location, the work will become source confirmation.
- If the responsible party is identified, educate the party on the impacts of their actions, explain the stormwater requirements and provide information regarding Best Management Practices.
- Evidence of illicit discharges traced to other MS4 jurisdictions will be provided to the responsible MS4 operator along with any collected data to assist that MS4 operator in completing their investigations to correct the illicit discharge or connection.
- Ann Arbor Public Schools will cooperate with the MS4 operator in determining the source or type of illicit discharge and/or connection and will follow-up to ensure that appropriate action has been completed by the MS4 operator to eliminate the discharge.
- Continue inspection and follow-up activities until the illicit discharge activity has ceased.
- Document all activities utilizing the Illicit Discharge/Illegal Dumping Reporting form.

A copy of the Illicit Discharge/Illegal Dumping Reporting form is in Appendix "B".

Once an illicit discharge has been confirmed from an Ann Arbor Public Schools facility, the discharge will be corrected using the most expedient method possible based on the type and configuration of the discharge or connections. Other 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.

Within 60 days of a confirmed illicit connection from a Ann Arbor Public Schools facility, Ann Arbor Public Schools will take steps to fix or eliminate the illicit connection. These steps include a review of corrective methods to be used to repair or eliminate the connection, determine the length of time the repair or elimination will take to complete, the cost of the elimination, the pollution potential and consider how the removal of the illicit connection will be confirmed. Corrective methods include capping, closing, or re-routing illicit connections to the sanitary sewer or other collection systems.

2.3.6 Illicit Discharge Regulatory Mechanism

The district developed a "Stormwater Management – Illicit Discharge Regulatory Policy". This illicit discharge regulatory policy was developed as a regulatory policy for prevention of pollution from storm water runoff and to protect the quality of the waters of the State of Michigan through the regulation of non-stormwater discharges to the municipal separate storm sewer system (MS4) to the maximum extent practicable as required by federal and state law. This regulatory mechanism establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit through the Michigan Department of Environment, Great Lakes, and Energy (EGLE). The objectives of the regulatory mechanism are:

1. To regulate the contribution of pollutants to the MS4 by stormwater discharges by any user.
2. To prohibit illicit connections and discharges into the MS4.
3. To establish authority to investigate, inspect, and monitor suspected illicit discharges.

The Stormwater Program Manager or designee will be provided full access to all district facilities and properties owned and operated by the district as required to inspect, investigate, and monitor suspected or confirmed illicit discharges or connections to the MS4.

This policy is posted on the district stormwater webpage. Additionally, the district stormwater webpage includes information on how to notify district if a discharge is witnessed taking place. Finally, the "Stormwater Management Illicit Discharge Regulatory Policy" will be emailed to district staff members. The "Stormwater Management Illicit Discharge Regulatory Policy" is available in Appendix "B".

Illicit Discharge means any discharge to, or seepage into the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater except discharges pursuant to an NPDES permit. Illicit discharges include but are not limited to the following:

- Dumping of motor vehicle fluids
- Improper disposal of household hazardous wastes
- Grass clippings
- Leaf litter
- Pet & other animal wastes
- Unauthorized discharges of sewage
- Industrial wastes
- Restaurant wastes
- Vehicle & equipment wash waters
- Any non-stormwater waste

All activities are documented utilizing the Illicit Discharge/Illegal Dumping Reporting form.

Illicit Connection means a physical connection to the MS4 separate stormwater system that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4 separate storm sewer system; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

Ann Arbor Public Schools' policy is to eliminate all illicit connections or discharges from their facilities and restrict the discharge of polluting substances to the separate storm sewer system. The process to achieve these goals will consist of the inspection and screening of all storm sewer systems and elimination of any improper connection from any Ann Arbor Public Schools facility to any waterway or the municipally owned separate storm sewer system (MS4).

Prohibitions of Illicit Discharges

1. Prohibition of Illicit Discharges:
    a. Ann Arbor Public Schools prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.
2. The following discharges are NOT prohibited:
    a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the Ann Arbor Public Schools MS4. Discharge or flows from firefighting activities will be addressed only if they are identified as significant sources of pollutants to surface waters of the state.
    b. The following activities are not prohibited under this policy unless they are determined to be significant sources of pollutants to surface waters of the state:

- Water line flushing and discharges from potable water sources.
- Landscape irrigation runoff, lawn water runoff, and irrigation waters.
- Diverted stream flows and flows from riparian habitats and wetlands.
- Rising groundwater and springs.
- Uncontaminated groundwater infiltration and seepage.
- Uncontaminated pumped groundwater, except groundwater cleanups specifically authorized by NPDES permits.
- Air conditioning condensation.
- Street wash water.

Identifying a discharge or flow as a significant contributor is completed on a case-by-case basis and is dependent on many factors, including the type of pollutant, amount discharged, and impacts to surface waters of the state.

Prohibition of Illicit Connections

1. Improper connections in violation of this regulatory mechanism must be disconnected and redirected.
2. Illicit discharge and connections will be eliminated.
3. The construction, use, maintenance, or continued existence of illicit connections to the storm drain system is prohibited by Ann Arbor Public Schools. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

2.3.7 Illicit Discharge Elimination Training

A training program is an important component of to an effective IDEP. 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. Training is discussed in detail in Section 3.0 of this SWMP.

2.3.8 Illicit Discharge Elimination Program Effectiveness

Ann Arbor Public Schools is required to track implementation of the illicit discharge elimination program stormwater management items and evaluate its effectiveness. Documentation of these items includes documentations of actions taken to eliminate illicit discharges. The following are examples of the types of performance measures and effectiveness measures that may be used to evaluate the effectiveness of the IDEP program. The following information will be reviewed annually, and will be used to focus and modify activities to maximize environmental benefits of the plan:

- Verify the distribution of public education posters.
- Number of outfalls/discharge points screened.
- Number of illicit connections found.
- Number of illicit connections eliminated.
- Number and type of discharges that are investigated.
- Actions conducted to follow-up discharges that are identified or reported.
- Number of scheduled clean-outs and routine maintenance work conducted.

The District shall evaluate:

1. Evaluate the number of illicit discharges and determine if discharges have decreased throughout the permit cycle.

2. Evaluate if the number of reported potential discharges has increased due to improved awareness.
3. Evaluate dry weather screening monitoring data to measure changes in water quality.

2.3.9 Illicit Discharge Elimination Program – BMP Table

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.9.1 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.	Maps Completed in 2021 Updates Ongoing as Needed Within 30 days of new outfalls, discharge points, structures and conveyances.	100% of facilities mapped, and 100% of storm sewer system updates mapped.	Maintain facility site maps at Facility Operations Building.	Ann Arbor Public Schools
				Update facility map with sewer system updates. Maintain maps for progress report submittal.	Ann Arbor Public Schools
BMP#2.3.9.2 Enforcement	Written policy to enforce elimination of illicit discharges into MS4 owned by the Permittee.	Illicit Discharge Regulatory Policy Developed and Implemented	Illicit Discharge Regulatory Policy developed and implemented.	Copy of the Illicit Discharge Regulatory Policy and distribution to staff.	Ann Arbor Public Schools
				Copy of policy available on the district stormwater webpage.	
BMP #2.3.9.3 Dry Weather Screening	Dry Weather Screening conducted every 5 years. Dry weather screening will be conducted by personnel trained to recognize all signs of possible illicit discharges.	Subsequent round of DWS Scheduled for 2022 and 2023	100% of outfalls and point of discharges inspected and evaluated following a period of 48-72 hours of dry weather. Outfalls/points of discharges re-inspected if necessary.	Maintain dry weather screening inspection logs/reports.	Ann Arbor Public Schools
BMP #2.3.9.4 Illicit Discharge Reporting	Eliminate illicit discharges and connections through reporting, routine storm sewer system inspections and dry weather screening inspections.	Ongoing Throughout Permit Cycle	Place "How to spot illicit discharge/ How to Report-Hotline Numbers" posters placed in Receiving Rooms at each Ann Arbor Public Schools facility. Goal is to have one poster at each facility.	Annually verify number of posters in place throughout the district.	Ann Arbor Public Schools
			Illicit Discharge Regulatory Policy developed and Copy of policy available on the district stormwater webpage.	Track number of calls and document calls onto Illicit Discharge/Illegal Dumping Reporting form. (Appendix "B").	

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.9.5 Unauthorized Discharge/ Illicit Discharge Complaint Response	The District 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., EGLE, local drain commission, etc.) within the required time period(s). This procedure is outlined in Section 2.3.10 Polluting Materials Emergency and Spill Response Policy & Procedures.	If, in the opinion of the District, immediate action to address the suspected discharge is indicated, the District will follow up within 7 days. Within 30 days of reported suspected discharge.	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.	Ann Arbor Public Schools
BMP #2.3.9.6 Illicit Connections	Reroute, repair, or disconnect any illicit connections.	Within 60 days of identified illicit connection	Take steps to eliminate 100% of identified illicit connections.	Work order, receipt or report detailing the illicit connection correction activities.	Ann Arbor Public Schools
BMP #2.3.9.7 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.	Once per permit cycle or during the 1st year of employment Throughout Permit Cycle	Goal of providing illicit discharge elimination training to all maintenance, transportation, custodial and skilled trade staff who work for Ann Arbor Public Schools. **[All Stormwater Training is outlined in Section 3.0 Training]**	Copy of sign in sheets and Agenda (if available).	Ann Arbor Public Schools
BMP #2.3.9.8 Notice of Intent to Discharge Tracer Dyes	Maintain approval from the EGLE for authorization to discharge tracer dyes in surface waters per General Rule 97 to conduct source investigations.	As needed Throughout Permit Cycle	EGLE approval to discharge tracer dyes.	Documentation of EGLE approval.	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.9.9 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.	Annually Throughout Permit Cycle	Annual review of SWMP IDEP program performed. Evaluate reduced illicit discharges, increase reporting and evaluate dry weather screening data.	Maintain copy of SWMP annual review and evaluation information for progress reporting.	Ann Arbor Public Schools

2.3.10 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 Ann Arbor Public School facilities.

Policy

Only trained and authorized personnel are permitted to respond to hazardous materials incidents! Employees must be trained in the safe use of chemicals or chemical management prior to working in a lab or cleaning up minor spills. The Stormwater Program Manager 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 and comply with all Federal, State, and local regulatory requirements for the management and reporting of all hazardous materials and/or waste releases.

If it is determined that the release poses a threat to the safety or the environment outside the facility or in excess of the threshold reporting quantities, the Stormwater Program Manager will report the release immediately or within 24 hours of knowledge of the release to:

- The EGLE Jackson District Office at (517)-780-7960 during regular working hours.
- The 24-hour Michigan Pollution Emergency Alerting System (PEAS) at 1-800-292-4706 after working hours.

Any release of oil (includes gasoline, diesel fuel, used oil and mineral spirits) to navigable waters or adjoining shorelines will be reported to the immediately or within 24 hours of knowledge of the release to:

1. The 24-hour National Response Center (NRC) at 1-800-424-8802

The Stormwater Program Manager 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 Stormwater Program Manager.

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. Minor Spill or Leak

- Attempt to contain the spill.
- Wear proper Personal Protective Equipment (PPE) while cleaning up the spill/leak.
- Notify supervisor and call Stormwater Program Manager at 734-994-8118.

2. Major Spill or Leak

- Call the Stormwater Program Manager immediately at 734-994-8118.

- Do not attempt to clean up the spill yourself.
- Provide clean-up/rescue personnel with appropriate Safety Data Sheets (SDS) and other important information.

Refer to sections **2.3.4 Illicit Discharge Identification & Investigation Procedure – Field Screening & Source Investigation** and **2.3.5 Illicit Discharge/Connection Elimination Procedure** for implementation timeframes.

This guidance has been developed in anticipation of potential releases of hazardous materials and substances. The procedures outlined in this guidance will 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. The district will conduct follow-up inspections and sampling as needed to ensure that appropriate action has been completed.

2.4 Construction Site Stormwater Runoff Control Program

Ann Arbor Public Schools' goal is to establish procedures for construction stormwater runoff control to meet minimum measure requirements to 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. 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.
B. Procedure for when to notify the EGLE 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.
C. Procedure for ensuring that construction activity one (1) acre or greater in total land disturbance obtains a Part 91 Permit.

2.4.2 Construction Notification Procedure

The EGLE certified construction stormwater operator inspector conducting site inspections will normally detect any soil or sediment entering the MS4.

In the event an inspector identified a discharge during an inspection:

1. The inspector shall document all details of the soil erosion and sedimentation control deficiency and report to the Ann Arbor Public Schools Stormwater Manager.

2. The Ann Arbor Public Schools Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency.
3. Ann Arbor Public Schools will notify the local Part 91 agency and EGLE when significant runoff of soil, sediment, or other pollutants such as pesticides, petroleum derivatives, construction chemicals, or solid wastes from the construction site discharges to the MS4 or surface waters of the state within 24 hours of discovery or as otherwise required by the issuing agency.

In the event of a public complaint:

Ann Arbor Public Schools will track the receipt of 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.

The tracking will include:

- 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).

Ann Arbor Public Schools will notify the Part 91 Agency, when soil, sediment, and other pollutants such as pesticides, petroleum derivatives, construction chemicals, and solid wastes are discharged into MS4.

Ann Arbor Public Schools ensures that construction activity one acre of greater in total earth disturbance with the potential to discharge to the MS4 does obtain a Part 91 Permit and State of Michigan Permit by Rule.

2.4.3 Part 91 Permit

Ann Arbor Public Schools will ensure that any construction activity that result 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.

Will obtain a Part 91 Permit through the site plan review process with the appropriate permitting agency.

2.4.4 Permit by Rule Compliance

Ann Arbor Public Schools 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 storm water coverage upon securing a SESC permit from the appropriate Part 91 recognized County Enforcing Agency, Municipal Enforcing Agency, or 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 EGLE 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 EGLE.

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	Responsible Party
BMP #2.4.5.1 Notification of Deposit during Inspection	Ann Arbor Public Schools will notify the local part 91 agencies or EGLE 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 Ann Arbor Public Schools Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency. (Refer to section 2.4.2)	As necessary Throughout Permit Cycle	100% discharges identified and appropriate agencies notified. Control of potential system failure.	Documentation of Construction Stormwater Operator site inspection.	Ann Arbor Public Schools
	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]).	Ann Arbor Public Schools
BMP #2.4.5.2 Part 91 Permit	Ann Arbor Public Schools will ensure that any construction activity that result in a land disturbance 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 will obtain a Part 91 Permit through the site plan review process.	As necessary Throughout Permit Cycle	100% of permits obtained.	Copy of permit and associated soil erosion and sedimentation control plans.	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.4.5.3 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 EGLE of the construction activity.	As necessary Throughout Permit Cycle	Goal of 100% of weekly and precipitation event inspection completed by certified Construction Stormwater Operator.	Copy of inspections.	Ann Arbor Public Schools
	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 EGLE.		Goal of 100% of weekly and precipitation event inspection completed by certified Construction Stormwater Operator.	Copy of inspections.	Ann Arbor Public Schools
			100% NOC obtained.	Copy of NOC	Ann Arbor Public Schools

2.5 Post-Construction Stormwater Controls for New Developments & Redevelopments

Post-construction storm water runoff is the storm water that would flow from a project site to the Municipal Separate Storm Sewer System (MS4) after completion of a development or redevelopment project (not during the project).

A post-construction stormwater runoff program compliance assistance document is available via the internet at https://www.michigan.gov/documents/deq/wrd-storm-MS4-ComplianceAssistance_470350_7.pdf.

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.

Projects that change the existing footprint (e.g., increase impervious surface) or offer new opportunities for storm water control (e.g., reconstruction to the subbase layer with a change in underdrainage) are considered redevelopment projects.

The objects of this program and associated procedures are to:

- Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impacts.
- 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.
- Ensure post construction controls to minimize water quality impacts by following water quality treatment standards.
- Require that BMPs be designed on a site-specific basis to reduce post-development total suspended solids loading.
- Procedure to meet water quality treatment and channel protection standards of new development or redevelopment projects.
- Address “hot spots”.
- Submit site development plans for review and approval.
- Require adequate long-term O&M of BMPs by ordinance or other regulatory means.

2.5.2 Post-Construction Policy and Procedure

The district has developed a Stormwater Management - Post-Construction Policy & Procedure to direct compliance with these requirements. The Stormwater Management - Post-Construction Policy & Procedure is in Appendix “B”.

Development and redevelopment projects on district properties are regulated under and must comply with the Ann Arbor Public Schools individual NPDES permit for stormwater discharges, as issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Stormwater Management Post-Construction Policy & Procedure has been developed to provide guidance regarding responsibilities and actions to meet the NPDES permit conditions for development and redevelopment projects on Ann Arbor Public School properties.

The post-construction plan for stormwater management on regulated sites **must** include:

- A minimum treatment volume standard to address water quality impacts.
- Channel protection criteria to address resource impairment resulting from flow volumes and rates.
- Review 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 to ensure that infiltration BMPs do not exacerbate existing conditions. 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.
- Drawings showing the location of stormwater control measures and the storm system.
- Details on the proposed stormwater control measures.
- Operation & Maintenance (O&M) requirements.
- Supporting information:

    - Calculations used for designing all components of the stormwater management systems.
    - Total suspended Solids (TSS) design removal rates and supporting manufacturer documentation, if applicable.
    - Geotechnical report including soil boring and infiltration test data.

The project team [Architecture, Engineering & Construction, Other Project Manager, Project Developer and/or Contractors] shall develop the post-construction stormwater management plan in accordance with this guideline and the NPDES permit.

The Stormwater Program Manager will administer and enforce the stormwater management program, including maintaining procedures, guidance, information, etc. to aid district staff and contractors in complying with the post- construction requirements for stormwater management.

2.5.3 Water Quality Treatment Standard

Ann Arbor Public Schools 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 will be included as part:

1. Treat the first one inch of runoff from the entire 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 EGLE memo dated March 24, 2006, which is available via the internet at http://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent_557709_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

2.5.4 Channel Protection Performance Standard

Ann Arbor Public Schools 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. More restrictive channel protection criteria may be utilized on a case-by-case basis, as appropriate.

Rainfall Data

The rainfall data for calculating runoff volume and peak flow rate shall be the 2013 NOAA Rainfall Frequency Atlas, Volume 8. https://www.weather.gov/media/owp/oh/hdsc/docs/Atlas14_Volume8.pdf.

There may be instances where site conditions (e.g., space limitations or tight soils that prevent infiltration) challenge or prohibit feasibility of maintaining the project site's pre-development runoff levels for all storms up to the 2-year, 24-hour event. The district shall consider off-site mitigation (Section 2.6.7) or increase the required detention volume by up to an additional 20%. To manage that portion of proposed runoff that is not managed through infiltration or other upline BMPs, detention basins will be designed to capture and treat up to a 100-year recurrence interval storm event. Retention basins with no outlet will be capable of storing two consecutive 100-year recurrence interval storms.

2.5.5 Off-site Mitigation for Redevelopment Projects

Ann Arbor Public Schools shall seek alternative compliance where unable to fully implement stormwater controls on-site due to poor site conditions.

- **Off-site mitigation** refers to BMPs implemented at a location different from the original project site.
- **Watershed** refers to the area represented by a 10-digit Hydrologic Unit Code.
- **Sewershed** refers to the area where stormwater is conveyed by an MS4 to a common outfall or point of discharge.

Off-site mitigation requires that off-site location be located within the same jurisdiction and watershed/sewershed as the original project. The highest preference shall be given to locations that yield benefits to the same receiving water that received runoff from the original site.

The following criteria will be considered when determining the physical constraints of the project site:

- Limited size of the lot outside of the building footprint to create the necessary infiltration capacity even

with amended soils. The district shall consider small BMPs spread across the entire site rather than on large BMP prior to offsite mitigation.

- Soil instability as documented by a thorough geotechnical analysis.
- A site use that is inconsistent with capture and reuse of storm water.
- The potential water quality impact from the original project site and the benefits realized at the off-site location. For example, the water quality impact from a site with a discharge to a small-sized stream would be greater than a site on a larger river and an offset downstream of the project site may provide less water quality benefit.

A second set of infeasibility criteria include:

- Poorly draining soils
- Bedrock
- High groundwater, or the potential of mounded groundwater to impair other uses
- Stormwater hot spots (includes Part 201 and Part 213 sites, and areas of soil or groundwater contamination)

Ann Arbor Public Schools shall prepare a justification as to the infeasibility of fully meeting the post-construction storm water runoff control requirements on site and submit during progress reporting.

When site conditions enable the district to retain at least the volume of stormwater associated with a 0.4 inch rain event, remaining off-site compliance will be provided at a 1:1.5 ratio. When this minimum cannot be met onsite, a 1:2 ratio applies. Off-site mitigation projects be completed within 24 months after the start of the original project site construction.

2.5.6 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 to ensure that infiltration BMPs do not exacerbate existing conditions. 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 of 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

2.5.7 Site Plan Review

This policy is to establish requirement to submit a site plan for review as required by the EGLE NPDES Stormwater Discharge Permit. Ann Arbor Public Schools 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 site plan will be reviewed by the Ann Arbor Public Schools contracted civil engineering firm. The review of the stormwater site plan will provide the state with the ability to ensure that water quality objectives, erosion and sediment control requirements, and BMP maintenance are adequately considered. Additionally, Ann Arbor Public Schools will submit to the City of Ann Arbor for review and comment.

The goal of the site plan review is to:

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

2.5.8 Long-Term Operation & Maintenance of Stormwater Controls

Ongoing operation and maintenance of the stormwater BMPs is a critical component of the Stormwater Management Plan. All structural and vegetative stormwater control measures installed as a requirement under

this section of the permit shall include guidance for maintaining maximum design performance through long-term operation and maintenance.

- 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.
- Follow long-term guidance for inspection and operation to maintain maximum design performance.
- Stormwater runoff facilities shall be maintained in good condition, in accordance with the approved storm water plan.

Trained staff or certified contractors will conduct routine inspection of all identified structural controls and complete maintenance, repair, or replacement, as necessary.

2.5.9 Post-Construction Stormwater Management-BMP Table

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.5.7.1 Regulatory Mechanism	Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impact. 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.	Post-Construction Policy & Procedure Developed & Implemented	Post-Construction Policy & Procedure adopted by the district.	Copy of the Post-Construction Policy and Procedure.	Ann Arbor Public Schools
BMP #2.5.7.2 Post Construction Standards	Ensure post-construction channel protection standards and water quality treatment standards are met.	As necessary Throughout Permit Cycle	All applicable site plan is reviewed by the State of Michigan.	Copy of site plan.	Ann Arbor Public Schools
BMP #2.5.7.3 Off-Site Mitigation	Ann Arbor Public Schools shall seek alternative compliance where unable to fully implement stormwater controls on-site due to poor site conditions.	Off-site mitigation projects completed within 24 months after the start of the original project site construction.	Approval from Water Resources Division, Jackson District Office.	Approval from Water Resources Division, Jackson District Office. Documentation of completed off-site mitigation.	Ann Arbor Public Schools
BMP #2.5.7.4 Site Specific	Ann Arbor Public Schools 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 Throughout Permit Cycle	Reduce or eliminate discharge of pollutants during construction on contaminated sites.	Documentation of additional stormwater controls.	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.5.7.5 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 where the area of disturbance meets or exceeds one (1) acre.	As necessary Throughout Permit Cycle	All applicable site plan is reviewed by the State of Michigan.	Copy of reviewed plans.	Ann Arbor Public Schools
BMP #2.5.7.6 Long-Term Operation & Maintenance of Stormwater Controls	All structural and vegetative stormwater control measures installed as a requirement under this section of the permit shall include guidance for maintaining maximum design performance through long-term operation and maintenance.	Within 30 days of following the completion a new facility or redevelopment site project. Throughout Permit Cycle	Follow long-term guidance for inspection and operation to maintain maximum design performance. Stormwater runoff facilities shall be maintained in good condition, in accordance with the approved storm water plan.	All storm sewer site maps updated. Maintain all inspection, maintenance, and repair reports conducted by staff or contractors.	Ann Arbor Public Schools

2.6 Pollution Prevention & Good Housekeeping Program

Develop, implement, and ensure compliance through a program of operation & maintenance of BMPs, with the ultimate goal of preventing or reducing pollutant runoff to the maximum extent practicable from operation 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. Procedure for updating and revising inventory of stormwater structural controls.
c. Procedure for assessing each facility for the potential to discharge pollutants.
d. Develop an SOP (SWPPP) for all facilities with a high potential for pollutant runoff.
e. Procedure 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. Procedure for prioritizing of 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. Procedure for inspecting and maintaining storm water controls.
k. Procedure for 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 Ann Arbor Public Schools to prevent and reduce pollutant/contaminant runoff from Ann Arbor Public Schools 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

No prioritization will be needed, as all structures are to be inspected and maintained equally. 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.

The structural Control Inventory and Schedule tables for each property are in Appendix E.

2.6.3 Facility Assessment & Prioritization

Ann Arbor Public Schools has identified all applicant owned facilities with a discharge of stormwater to surface waters of the state, and during mapping of each facility, inventoried the number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site. Each location was assessed to determine high, medium and low potential to discharge pollutants to surface waters of the state.

Ann Arbor Public Schools considered the following when assessing each facility:

- Absence of any factors,
- Presence of urban pollutants stored at the site (i.e. sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants,
- Identification of improperly stored materials,
- Potential for polluting activities to be conducted outside (i.e. vehicle washing),
- Proximity to water bodies,
- Poor housekeeping practices,
- Discharge of pollutants of concern to impaired waters.

For facilities that have a high potential to discharge pollutants to surface waters of the state, a Stormwater Pollution Prevention Plan (SWPPP) and/or Pollution Incident Prevention Plan (PIPP) for salt storage facilities will continue to be implemented.

BMPs currently implemented by Ann Arbor Public Schools at facilities with medium and lower potential for the discharge of pollutants to surface waters of the state include:

1. Good housekeeping practices,
2. Employee training,
3. Routine visual inspections,
4. Spill prevention and response.

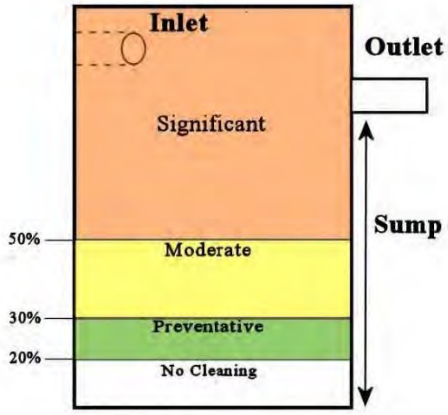
This inventory will be updated as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant following routine inspections or following new construction or redevelopment projects. Priority level assessments will be revised within 30 days following the completion a new facility or reconstruction/redevelopment.

2.6.4 Storm Sewer Structure Controls Inspection & Maintenance Policy & Procedure

1. Develop a schedule for inspecting and maintaining catch basins and stormwater controls at each facility, for the reduction of pollutant runoff. Schedules are included in Appendix “E”.
2. Visually inspect all stormwater controls identified on facility maps. Inspection includes:

a. Structural integrity of the structure.
    - Areas of significant cracking or sinkholes.

b. Sediment build-up.
    - Areas with high amounts of build-up sediment. A build-up of accumulated solid material that is greater than or equal to the one-third guideline established by the EPA or between 30 and 50% of the total sump depth, as established by the EGLE[3].



c. Color, odor, sheen, and flow.
d. Overall functionality and presence of erosion.
e. Pond evaluation.

3. Note inspection information on the inspection form. A copy of the inspection form "Structural BMP Table" is located in Appendix "D".
4. When inspecting stormwater controls, review the site for non-structural BMPs currently implemented to prevent or reduce pollutant runoff at each facility. BMPs include:
    a. Review of "No Dumping" stencils at storm drains.
    b. Review of catch basins/manholes cleaned.
    c. Dumpster good housekeeping practices.
    d. Garden, green space and signage inventories.
    e. "SEMCOG" poster placement at facilities.
    f. Illicit discharge reporting numbers poster placement at facilities.
    g. "How to spot illicit discharge/ How to Report-Hotline Numbers" poster placement at facilities.
    h. Spill kit availability at facilities.
5. Following the inspection, the stormwater controls will be prioritized for cleaning and maintenance in a timely manner. Prioritize locations based on the following:
    - Drainage structures that are designated as consistently generating the highest volumes of trash and/or debris.
    - Areas with high amounts of build-up sediment. Refer to number 2 (b) above.
    - Areas of significant erosion.
    - Areas of significant cracking or sinkholes.
6. Once the inspection is complete, the stormwater manager or designated person will review the report and determine if a work order or other item is needed to needed to work with relevant departments or contractors to fix any problems.

[3] Michigan Department of Environment, Great Lakes, and Energy EGLE NPS BMP Manual – Catch Basins

7. If an illicit discharge is suspected, follow the procedure outlined in Section 2.3 Illicit Discharge Elimination Program.
8. Retain inspection forms for each stormwater structural control inspected.
9. Retain documentation regarding the scheduling or completion of the repair/maintenance if completed.
10. Debris and maintenance waste removed as part of the maintenance and/or repairs shall be disposed of in accordance with the Structural BMP Operation & Maintenance Waste Disposal procedures.

Furthermore, staff members conducting maintenance and grounds activities are provided IDEP and pollution prevention/good housekeeping training. 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. This procedure will be reviewed on an annual basis and updated as needed or 30 days following the implementation of a new stormwater structural control.

2.6.5 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 By-products" pursuant to Part 121, Liquid Industrial By-products (Part 121) of NREPA.

Ann Arbor Public Schools 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 by-products), 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.

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 methods 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 will be collected into a vacuum truck and treated as Liquid Industrial By-Products 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:
    - Sanitary system (with prior approval from local sewer authority).
    - Curb and gutter.
    - 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.
    - 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 will be collected with a vacuum truck and disposed of off-site in accordance with MI P.A. 451 Parts 115 or 121.

Ann Arbor Public Schools does not currently own or operate storm sewer cleaning or transportation equipment. If Ann Arbor Public Schools 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 By-Product 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 liquid industrial by-product under Part 121 or Part 115 of PA 451 (NREPA).

2.6.6 Pollution Prevention/Good Housekeeping – Municipal Operations & Maintenance Activities

Ann Arbor Public Schools recognizes the importance of reducing pollutant runoff from maintenance activities. The following procedure will include an assessment of the potential activities for the potential to discharge pollutants. The assessment shall identify the pollutants that could be discharged from the applicable operation and maintenance activity and the BMPs implemented or to be implemented to prevent or reduce pollutant runoff.

PROCEDURE

Applicable operations and maintenance activities include parking lot and sidewalk maintenance, cold weather operations, vehicle washing, maintenance of vehicles, land disturbance and landscape. Bridge maintenance, right-of-way maintenance and unpaved road maintenance do not apply to Ann Arbor Public Schools.

Roadways/Parking Lots

Maintenance: Pothole, sidewalk, curb, and gutter repair.
Possible Pollutants: Fuel, oil, sediment, concrete.
BMPs to address Pollutants:

1. Contractors and in-house staff contracted to complete for these jobs are informed of stormwater management practices to reduce pollution in stormwater.
2. Avoid mixing excess amounts of fresh concrete or cement.
3. Never dispose of washout into the street, storm drains, ditches or creeks.
4. Stencil storm drains to prevent disposal of wash water.
5. Schedule patching, resurfacing and surface sealing during dry weather.
6. If it rains unexpectedly, take appropriate action to prevent pollution of stormwater runoff (e.g., divert runoff around work areas, cover materials).

7. Maintain pollution prevention/good housekeeping practices, which is to remove stockpiles (asphalt materials, sand, etc.) by the end of the day to a covered location. Alternatively, cover the piles if they cannot be moved.

Process for updating assessment: Contractor or project is assessed on an ongoing basis, and problems are addresses when found.

Cold Weather Operations

Maintenance: Plowing, sanding, deicing, snow pile disposal.

Possible Pollutants: Sodium, magnesium, calcium, potassium, chloride, turbidity.

BMPs to address Pollutants:

1. Keep all deicing material under covered or enclosed areas and on impervious surfaces. Inspect salt storage shed for leaks, structural problems.
2. Frequently sweep near the storage/loading areas to reduce the amount of salt, sand, or other materials that is tracked out.
3. Do not overfill trucks with deicing materials as it may lead to spill and Inspect for excessive amounts of salt on roads to prevent deicer drainage to storm sewers.
4. Mechanical removal of as much snow or ice as possible prior to applying deicing chemicals.
5. When possible, utilize on-board application regulators.
6. Service trucks and calibrate spreaders regularly to ensure accurate, efficient distribution of salt.

Process for updating assessment: BMPs will be assessed for effectiveness within 30 days following their addition or removal.

Vehicle Washing

Maintenance: Washing of buses, staff vehicles and maintenance equipment.

Possible Pollutants: Petroleum based wastes, metals, and nutrients.

BMPs to address Pollutants:

1. All vehicle washing and maintenance is to be performed indoors where drains connecting to the sanitary system can receive all wastes. The District has an interior bus wash on site.
2. Alternatively, vehicle washing can be performed at a commercial auto wash facility.
3. Alternatively, rinse grass from lawn care equipment on permeable (grassed) areas.
4. School car wash fundraising events will not be permitted on school grounds.

Process for updating assessment: BMPs will be assessed for effectiveness within 30 days following their addition or removal.

Vehicle Maintenance

Possible Pollutants: Petroleum based wastes, metals, and nutrients.

BMPs to address Pollutants:

1. Oil-water separators will be inspected routinely and serviced as necessary to maintain efficiency.
2. All vehicle or equipment maintenance will take place inside or away from storm drains where drains connecting to the sanitary system can receive all wastes.
3. All drains within maintenance garages will be dye tested to assure that no drains flow into the separate storm sewer system.
4. Recycle used motor oil, diesel oil, other vehicle fluids, and vehicle parts whenever possible.

Process for updating assessment: BMPs will be assessed for effectiveness within 30 days following their addition or removal.

Landscaping

Possible Pollutants: Wood chips, sediment, sand, and compost.

BMPs to address Pollutants:

1. Place temporary stockpiled material away from storm drains, and berm or cover stockpiles to prevent material releases into the storm drain. Alternatively, place stockpiles on permeable (grassed) areas.
2. Conduct annual stream back inspections.
3. Provide adequate buffer areas at stream banks.
4. Proper Storage, handling, and use of pesticides, herbicides, and fertilizers.

Process for updating assessment: BMPs will be assessed for effectiveness within 30 days following their addition or removal.

Land Disturbance

Possible Pollutants: Sediment runoff.

BMPs to address Pollutants:

1. Plan land clearing so soil is not exposed for long periods of time.
2. Place temporary stockpiled material away from storm drains, and berm or cover stockpiles to prevent material releases into the storm drain.
3. Protect against sediment flowing into drains.
4. Install sediment barriers.

Process for updating assessment: BMPs will be assessed for effectiveness within 30 days following their addition or removal.

ASSESSMENT

Pollution prevention inspections ensure that these BMPs are carried out properly. Any issues identified during the inspections will be reviewed and addressed by the Stormwater Manager.

2.6.7 Street Sweeping Procedure, Prioritization & Schedule

PRIORITIZATION

The EGLE NPDES Phase II Stormwater Discharge Permit requires a procedure for prioritizing owned streets, parking lots, and other impervious infrastructure for street sweeping based on the potential to discharge pollutants. Ann Arbor Public Schools evaluated each facility for the presence of the following factors:

- Potential for polluting activities to be conducted outside.
- Proximity to water bodies
- Traffic volume
- Land use
- Absence of any factors

PROCEDURE

Ann Arbor Public Schools does not own or operate sweeping equipment. However, Ann Arbor Public Schools will be proactive and undertake the following activities to reduce the potential to discharge pollutants to surface waters of the state from parking lots and other impervious infrastructures.

1. Conduct seasonal efforts to remove leaves.
2. Inspect parking lot and street areas.
3. Conduct hand sweeping of debris to prevent accumulated wastes.
4. Waste disposal areas will be kept free of litter and debris.

5. Analyze sediment, removed from an inlet cleaning if it is suspected of being contaminated with a hazardous material, prior to disposal. Sediment or materials determined to be hazardous waste will be disposed of in accordance with the Structural BMP Operation & Maintenance Waste Disposal procedures.
6. Contract out street cleaning when appropriate.

This prioritization will be updated as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant following routine inspections, or as traffic volume, land use or sediment and trash accumulation increases.

PRIORITIZATION LEVELS & SCHEDULE

All low, medium, and high prioritized parking lots and streets are inspected on the same schedule in an effort to reduce pollutants.

Facility Name	Priority Level of Potential Discharge* (High, Med, Low)	Street Sweeping Schedule
Administration & Transportation Complex	High	Monthly Inspections, Hand Sweep as Needed
Abbot Elementary School	Low	Hand Sweeping, Spring and Fall
Allen Elementary School	Low	Hand Sweeping, Spring and Fall
Angell Elementary School	Low	Hand Sweeping, Spring and Fall
Ann Arbor Open @ Mack School	Low	Hand Sweeping, Spring and Fall
Ann Arbor STEAM @ Northside School	Low	Hand Sweeping, Spring and Fall
Bach Elementary School	Low	Hand Sweeping, Spring and Fall
Bryant Elementary School	Low	Hand Sweeping, Spring and Fall
Burns Park Elementary School	Low	Hand Sweeping, Spring and Fall
Carpenter Elementary School	Low	Hand Sweeping, Spring and Fall
Clague Middle School	Low	Hand Sweeping, Spring and Fall
Community High School	Low	Hand Sweeping, Spring and Fall

Facility Name	Priority Level of Potential Discharge* (High, Med, Low)	Street Sweeping Schedule
Dicken Elementary School	Low	Hand Sweeping, Spring and Fall
Eberwhite Elementary School	Low	Hand Sweeping, Spring and Fall
Freeman School	Low	Hand Sweeping, Spring and Fall
Forsythe Middle School/ Wines Elementary School COMPLEX	Low	Hand Sweeping, Spring and Fall
Haisley Elementary School	Low	Hand Sweeping, Spring and Fall
Huron High School	Medium	Hand Sweeping, Spring and Fall
King Elementary School	Low	Hand Sweeping, Spring and Fall
Lakewood Elementary School	Low	Hand Sweeping, Spring and Fall
Lawton Elementary School	Low	Hand Sweeping, Spring and Fall
Logan Elementary School	Low	Hand Sweeping, Spring and Fall
Pathways To Success Academic Campus	Low	Hand Sweeping, Spring and Fall
Pattengill Elementary School	Low	Hand Sweeping, Spring and Fall
Pioneer High School	Medium	Hand Sweeping, Spring and Fall
Pittsfield Elementary School	Low	Hand Sweeping, Spring and Fall
Scarlett Middle School/ Mitchell Elementary School COMPLEX	Low	Hand Sweeping, Spring and Fall
Skyline High School	Medium	Hand Sweeping, Spring and Fall

Facility Name	Priority Level of Potential Discharge* (High, Med, Low)	Street Sweeping Schedule
Slauson Middle School	Low	Hand Sweeping, Spring and Fall
Tappan Middle School	Low	Hand Sweeping, Spring and Fall
Thurston Elementary School	Low	Hand Sweeping, Spring and Fall
Westerman Preschool and Family Center	Low	Hand Sweeping, Spring and Fall
Parcel #1	NA	NA

If required, following inspections indicating higher traffic volume, land use or sediment and trash accumulation at all low, medium and high prioritized parking lots and streets, the District shall contract a commercial street sweeping company.

DISPOSAL

If a commercial street sweeper is contracted to clean a parking lot and street areas for Ann Arbor Public Schools, the street sweeping activities are subject to the solid waste requirements. Solid waste must be managed under Part 115 requirements. Dispose of the solid waste in a licensed landfill. The contractor hired to do the street sweeping is responsible for proper disposal of the waste material. The contracted sweeping will not be completed when streets are wet, so dewatering of the collected debris will not be required.

2.6.8 Managing Vegetated Properties

Ann Arbor Public Schools has established this policy to prevent or reduce pollutant runoff from vegetated land:

1. Ann Arbor Public Schools requires all contracted personnel who participate in the application of pesticides, to 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.
2. Whenever practicable, integrated pest management techniques will be implemented.

2.6.9 Contractor Requirements & Oversight

Ann Arbor Public Schools requires contractors to comply with pollution prevention and good housekeeping BMPs. Ann Arbor Public Schools will perform all of the following activities for applicable contractors and projects to comply with all pollution prevention and good housekeeping BMPs as appropriate and comply with pollution as well as provide oversight to ensure compliance:

- Contractor Notification
- Contractor Training
- Pre-project Meeting/Review

- Periodic Inspections

Ann Arbor Public Schools shall utilize a "Stormwater Contractor Oversight Record" form to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures. The "Stormwater Contractor Oversight Record" form is located in Appendix "F".

2.6.10 Pollution Prevention/Good House Keeping Training

A training program is an important component to effective pollution prevention. Training is required for all employees whose job responsibilities involve municipal or maintenance activities. Training is discussed in detail in Section 3.0 of this SWMP.

2.6.11 Pollution Prevention/Good Housekeeping –BMP Table

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.1 Structural Control Inventory	Provide an up-to-date inventory of the number of stormwater structural controls for each facility's (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. Ongoing Throughout Permit Cycle	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.	Ann Arbor Public Schools
BMP #2.6.11.2 SWPPP development & implementation (SOP)	Develop a "Stormwater Pollution Prevention Plan (SWPPP)" for maintenance, transportation, and storage facilities/Implement policies & procedures.	Developed & Implemented Ongoing Throughout Permit Cycle	SWPPP completed and 100% of inspections implemented.	Copy of SWPPP and copy of inspections.	Ann Arbor Public Schools
BMP #2.6.11.3 Stormwater Structural Control Inspections	Visually inspect stormwater controls identified on facility maps.	Annual Throughout Permit Cycle	Routine schedule implemented and inspections reviewed by stormwater manager.	Maintain inspection forms/reports.	Ann Arbor Public Schools
BMP #2.6.11.4 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, and Illicit discharge education posters.	Annually Throughout Permit Cycle	Annual inspections completed and reviewed by stormwater manager.	Documentation of inspection findings (number of posters, number of spill kits, inventory of gardens, and pictures of stencils).	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.5 Prioritization of Storm Sewer Locations for Maintenance & Cleaning	Following the inspection, the stormwater controls will 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 Throughout Permit Cycle	Prioritization locations identified.	Copy of prioritization.	Ann Arbor Public Schools
BMP #2.6.11.6 Cleaning & Maintenance (Catch Basin/ Manhole Cleaning)	Ann Arbor Public Schools will ensure that cleaning of the catch basins/manholes occur, and 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 By-Products), and Part 115 (solid wastes).	Once per permit cycle Or More often if prioritized due to a build-up of accumulated solid material that is greater than or equal to the one-third guideline outlined in the Storm Sewer Structure Controls Inspection & Maintenance Policy & Procedure	Prioritized locations cleaned once per permit cycle. All waste disposed as required.	Copies of Waste Manifests.	Ann Arbor Public Schools
BMP #2.6.11.7 Roadways & Parking Lots	Storm drains stenciled to prevent disposal of wash water into storm drains.	As needed Throughout Permit Cycle	Storm drain stencils inspected and maintained as need.	Copy of work order. Photos of stenciling.	Ann Arbor Public Schools
BMP #2.6.11.8 Cold Weather Operations	Proper salt storage management. Maintain storage bags and equipment in good working condition.	Ongoing Throughout Permit Cycle	Continue proper salt storage and management as previously implemented.	Copy of SWPPP comprehensive inspection report.	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.9 Vehicle Washing	All vehicle washing and maintenance is to be performed indoors where drains connecting to the sanitary system can receive all wastes.	Ongoing Throughout Permit Cycle	100 % of applicable staff trained on were to wash vehicles.	Copy of sign-in sheets and Agenda (if available).	Ann Arbor Public Schools
	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 e-mail or policy.	
BMP #2.6.11.10 Vehicle Maintenance	All drains within maintenance garages will be dye tested to assure that no drains flow into the separate storm sewer system.	As Needed Throughout Permit Cycle	100% of floor drains inspected.	Copy of inspection report.	Ann Arbor Public Schools
	Oil-water separators will be inspected routinely and serviced as necessary to maintain efficiency.	Annually Throughout Permit Cycle	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 Throughout Permit Cycle	Reduction in amount of disposed material and amount of material shipped for off-site disposal.	Copy of invoices or shipping papers.	
BMP #2.6.11.11 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 Throughout Permit Cycle	100% of bank inspections completed.	Copy of inspection sheets/reports.	Ann Arbor Public Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.12 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 Throughout Permit Cycle	100 % of applicable staff trained.	Copy of sign-in sheets and Agenda (if available).	Ann Arbor Public Schools
BMP #2.6.11.13 Street Sweeping	Conduct hand sweeping in the parking lots/roadways in the spring and fall.	Spring & Fall Throughout Permit Cycle	Inspections completed.	Copy of work order or schedule.	Ann Arbor Public Schools
	Street sweeping conducted by a professional sweeping company.	As needed Throughout Permit Cycle		Copy of invoice or disposal documentation.	
BMP #2.6.11.14 Vegetated Properties (Pesticides)	Ann Arbor Public Schools 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 Throughout Permit Cycle	Application of pesticides will only be completed by trained and licensed applicators.	Documentation of in-house staff license or copy of contractor receipt.	Ann Arbor Public Schools
BMP #2.6.11.15 Contractor Oversight	Ann Arbor Public Schools requires contractors to comply with pollution prevention and good housekeeping BMPs.	As needed Throughout Permit Cycle	Contractors informed of pollution prevention and good housekeeping techniques.	Copy of Stormwater Contractor Oversight Records.	Ann Arbor Public Schools & Contractors/ Vendors
	Utilize a Stormwater Contractor Oversight Record form to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures.				

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.12.16 Training	Pollution prevention and good housekeeping training.	Once per permit cycle or during the 1st year of employment Throughout Permit Cycle	Goal of providing training to maintenance staff who work for Ann Arbor Public Schools. **[All Stormwater Training is outlined in Section 3.0 Training]**	Copy of sign-in sheets and Agenda (if available).	Ann Arbor Public Schools
BMP #2.6.12.17 Pollution Prevention & Good Housekeeping Activities Review	Summary of annual activities for the "Pollution Prevention and Good Housekeeping".	Annually Throughout Permit Cycle	Annual review of SWMP performed. Maintain copy of SWMP annual review. Determine the level of district involvement and identify areas of improvement.	Maintain copy of SWMP annual review and evaluation information for progress reporting.	Ann Arbor Public Schools

3.0 Training

Ann Arbor Public Schools 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 Ann Arbor Public Schools employees will be required to have general awareness training on the topics included in the PEP. All applicable Ann Arbor Public Schools 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.

Ann Arbor Public Schools 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 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 districts Stormwater Management Program 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 (Optional)
Level III training is provided in the form of videos, PowerPoint presentations, and hands-on training. This training is provided to district supervisors, maintenance, and lawn service staff.

LEVEL IV TRAINING (CONTRACTORS) – Contractor Training/Oversight
Contractors employed by Ann Arbor Public Schools to conduct activities with a potential to impact water quality. Contractor training is provided in the form of an online video produced by Arch Environmental Group titled, **"Stormwater Awareness & Pollution Prevention Training for Contracted Public School District Vendors & Employees".**

The "Stormwater Contractor Oversight Record" form and Pollution Prevention Good Housekeeping sign in sheet are located in Appendix "F".

3.1 Training Table

BMP	Description	Measurable Goal	Target Audience	Timeframe
II **IDEP & PPGH Training** **Required**	General Awareness, Pollution Prevention & Good Housekeeping, and Illicit Discharge Elimination Program	Record attendance with sign-in sheets for each training session. Ann Arbor Public Schools will retain records of trainings for future review regarding SWMP.	In-house custodial, maintenance, transportation, and food service employees.	Required once during permit cycle current employees and during the 1st year of employment for new employees. Throughout Permit Cycle
III **Routine Storm Sewer Inspection Training** **Optional**	Train appropriate employees how to conduct a storm sewer system inspection. Only required if district staff will conduct storm sewer inspections.	Record attendance with sign-in sheets for each training session. Ann Arbor Public Schools will retain records of trainings for future review regarding SWMP.	District supervisors, in-house maintenance, and lawn service staff.	As needed. Throughout Permit Cycle
IV **Contractor Training/ Oversight** **Required**	Stormwater specific instruction for on-site contractors.	Utilize a "Stormwater Contractor Oversight Record" form to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures.	Contractors employed by Ann Arbor Public Schools to conduct activities with a potential to impact water quality.	Required at the time of employment. Throughout Permit Cycle

4.0 Total Maximum Daily Load (TMDL) Restrictions

Ann Arbor Public Schools has partnered with the Huron River Watershed Council (HRWC) and the Total Maximum Daily Load (TMDL) Implementation Plan for the Huron River Watershed MS4s in Washtenaw County. A copy of the Total Maximum Daily Load (TMDL) Implementation Plan for the Huron River Watershed MS4s in Washtenaw County is in Appendix "C". The HRWC will complete the two (2) rounds of wet weather monitoring as part of this collaborative agreement.

Ann Arbor Public Schools will put forth effort and resources to reduce the sources of impairments related to the TMDLs Phosphorus, *E. coli*, and Aquatic biota.

4.1 What are TMDLs

When a lake or stream fails to meet federal water quality standards, the Clean Water Act requires that a "Total Maximum Daily Load (TMDL)" limit be developed. Studies are completed to determine the sources impacting the water body and to develop goals so that the water body can meet the applicable standards.

A TMDL describes the process used to determine how much of a particular pollutant a lake or stream can assimilate and sets pollution reduction targets for the water body.

4.2 TMDL BMPs

The table below lists stormwater BMPs that are targeted to improve water quality impairments listed by TMDL affected, and the SWMP section they apply to. If the BMP addresses a TMDL, high (H), medium (M) or low (L) priority is indicated, or G indicates general implementation.

Section*	SWMP Actions	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	*E.coli* TMDL
ERP	Track instances of non-compliance as required under the permit	G	G	G
PPP	Access to the stormwater management plan	G	G	G
PPP	Stormwater Advisory Group (Watershed group)	G	G	G
PPP	Stormwater Management Program (SWMP) review.	G	G	G
PPP	Participation in Watershed Groups	G	G	G
PEP	Distribute Informational Materials	H	H	H
PEP	Watershed Community Calendar	G	G	G
PEP	Information in Community Newsletters and on Websites - Educational Content	G	G	G
PEP	Local Newspaper and Web/Other Advertisements	G	G	G
PEP	Promote Water Resource Protection Workshops	H	H	H
PEP	Volunteer Stream Monitoring	G	G	G

Section*	SWMP Actions	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	*E.coli* TMDL
PEP	Catch basin/Storm Drain Labeling	H	M	H
PEP	Riparian Land Management Information	H	H	H
PEP	Displays and Outreach at Local and Regional Fairs and Community Events	G	G	G
PEP	Promote County-wide Compliant Tracking and Response System	G	G	G
PEP	Stream and River Crossing Road Signs	G	G	G
PEP	Washtenaw County Community Partners for Clean Streams	G	G	G
PEP	Washtenaw County Pollution Prevention Inspections	H	L	H
PEP	Washtenaw County Issues of the Environment Radio Show	G	G	G
PEP	Washtenaw County Environmental Excellence Awards	G	G	G
PEP	Washtenaw County Fats, Oil and Grease & Litter Reduction	G	G	G
PEP	Washtenaw County River Safe Homes Program	G	G	G
PEP	Washtenaw County & City of Ann Arbor Residential Rain Garden Program	H	H	M
PEP	Washtenaw County Home Toxics Reduction Program	G	G	G
PEP	Washtenaw County Drug Take Back Program	G	G	G
IDEP	Dry Weather Screening Program & Data Collection	M	L	H
IDEP	Illegal Dumping/Spill Response & Database	G	G	G
IDEP	Environmental reporting line / Tracking	G	G	G
IDEP	Time of Sale & Field Inspections	M		H
IDEP	Pollution Prevention (P2) Program	M	L	H
IDEP	Staff Training	M	L	H
IDEP	Dye Testing	M	L	H
SESC	Soil Erosion and Sedimentation Control (SESC) Programs	H	H	
SESC	SESC Inspections	H	H	
SESC	Discharge notifications	H	H	
SESC	State of Michigan – Permit-by-Rule Notification	H	H	
PCSW	Require PCSW controls within jurisdiction, including on WC projects	G	G	G
P2GH	Municipal Facility & Structural Stormwater Control Inventory	G	G	G

Section*	SWMP Actions	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	*E.coli* TMDL
P2GH	Regulated Municipal Facility – Assessment of Potential for Pollutant Discharge	G	G	G
P2GH	Catch basin cleaning	H	H	M
P2GH	Lot sweeping	H	M	L
P2GH	Litter collection	G	G	G
P2GH	Proper Handling & Disposal of Operation and Maintenance Waste	H	M	L
P2GH	Employee/Contractor Training	G	G	G
P2GH	Staff Certifications	G	G	G
P2GH	IDEP Training	G	G	G
P2GH	Management of County-owned Vegetated Properties	H	M	

*** Key:**

ERP	Enforcement Response Procedure
PPP	Public Participation Plan
PEP	Public Education Plan
IDEP	Illicit Discharge and Elimination Plan
SESC	Construction Soil Erosion and Sediment Control
PCSW	Post-Construction Stormwater Runoff Program
P2GH	Pollution Prevention and Good Housekeeping

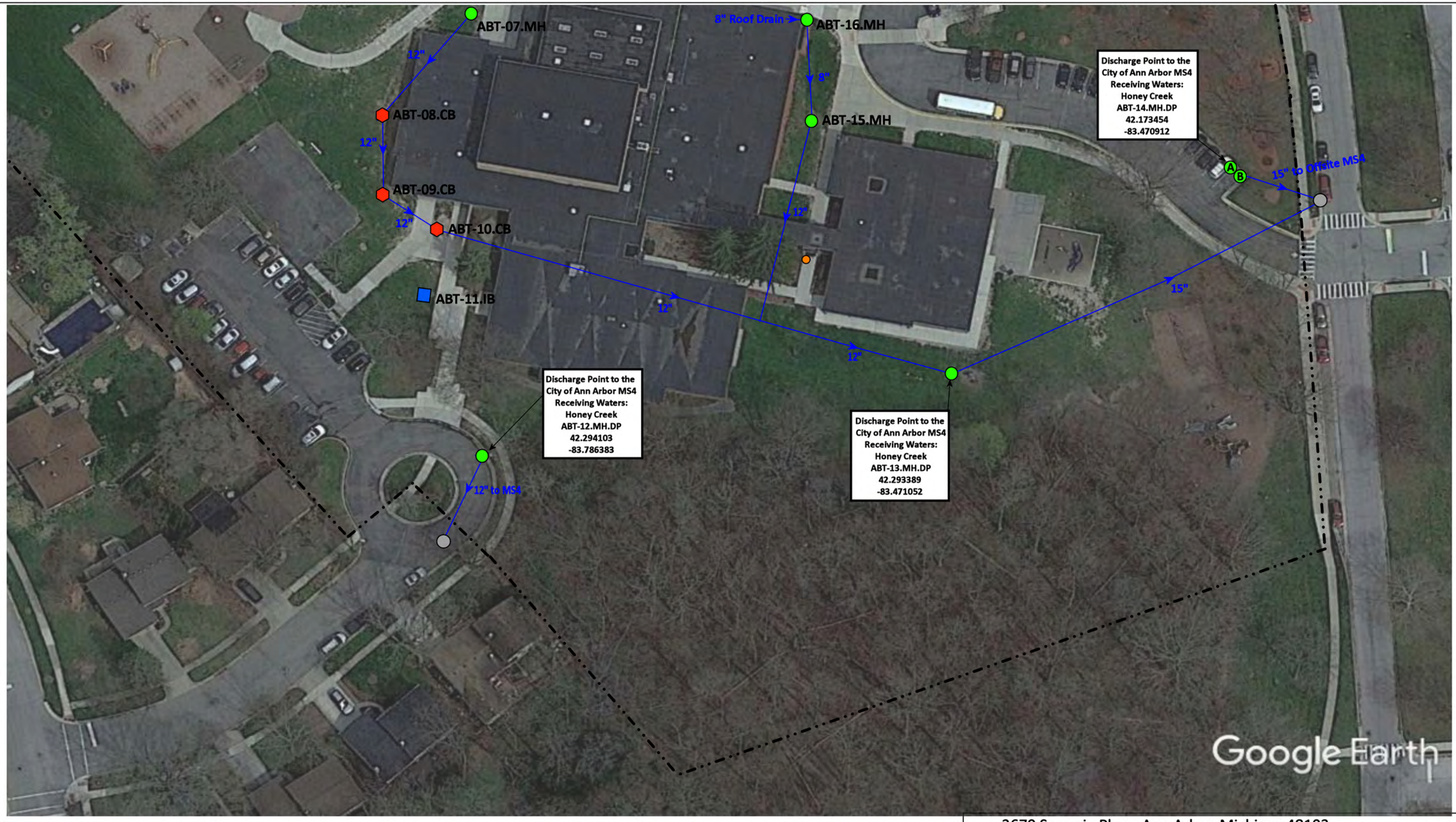
Appendix "A"

Outfall/Discharge Point Receiving Water Table & Site Stormwater Structure Maps

November 1, 2020
Revised: May 23, 2021

Ann Arbor Public Schools
Receiving Waters Table

Facility	Outfall/Point of Discharge	MS4	Receiving Waters	Watershed
Abbot Elementary School	ABT-01.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
	ABT-02.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
	ABT-12.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
	ABT-13.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
	ABT-14.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
Administration & Transportation	ADT-02.OP.OF	Surface Waters of the State	Swift Drain	Huron River
	ADT-09.SCC.OF	Surface Waters of the State	Swift Drain	Huron River
	ADT-12.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Allen Elementary School	ALN-06.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
	ALN-21.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Angell Elementary School	ANG-05.CB.DP	City of Ann Arbor MS4	Huron River	
	ANG-09.MH.DP	City of Ann Arbor MS4	Huron River	
Ann Arbor Open at Mack	Scheduled for review and update by June 30, 2022			
Bach Elementary School	BCH-02.CB.DP	City of Ann Arbor MS4	Barton Pond	Huron River
	BCH-03.CB.DP	City of Ann Arbor MS4	Barton Pond	Huron River
	BCH-05.MH.DP	City of Ann Arbor MS4	Barton Pond	Huron River
Bryant Elementary	BYT-03.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Burns Park Elementary School	Scheduled for review and update by June 30, 2022			
Carpenter Elementary School	CPT-05.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
	CPT-14.CB.DP	City of Ann Arbor MS4	Swift Drain	Huron River
	CPT-15.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Clague Middle School	Scheduled for review and update by June 30, 2022			
Community High School	Scheduled for review and update by June 30, 2022			
Dicken Elementary School	Scheduled for review and update by June 30, 2022			
Eberwhite Elementary School	EBW-07.SCC.DP	City of Ann Arbor MS4	Barton Pond	Huron River
Ellsworth Road Parcel	NONE			
Forsythe Middle School-Wines Elementary School COMPLEX	Scheduled for review and update by June 30, 2022			
Freeman School	Not Outfall or Discharge Point- Drains to Retention Pond			
Haisley Elementary School	HSL-04.CB.DP	City of Ann Arbor MS4	Barton Pond	Huron River
	HSL-06.FS.DP	City of Ann Arbor MS4	Barton Pond	Huron River
	HSL-10.MH.DP	City of Ann Arbor MS4	Honey Creek	Huron River
Huron High School	HRN-29.MH.DP	City of Ann Arbor MS4	Huron River	Huron River
	HRN-38.MH.DP	City of Ann Arbor MS4	Huron River	Huron River
	HRN-39.MH.DP	City of Ann Arbor MS4	Huron River	Huron River
	HRN-64.OP.OF	Surface Waters of the State	Swift Drain	Huron River
	HRN-67.OP.OF	Surface Waters of the State	Swift Drain	Huron River
	HRN-69.OP.OF	Surface Waters of the State	Swift Drain	Huron River
	HRN-102.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
King Elementary School	Scheduled for review and update by June 30, 2022			
Lakewood Elementary School	Scheduled for review and update by June 30, 2022			
Lawton Elementary School	Scheduled for review and update by June 30, 2022			
Logan Elementary School	Scheduled for review and update by June 30, 2022			
Pathways to Success Academic Campus	PTS-02.SCC.OF	Surface Waters of the State	Swift Drain	Huron River
	PTS-05.CB.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Pattengill Elementary School	PTG-06.MH.DP	City of Ann Arbor MS4	Swift Drain	Huron River
Pioneer High School	Scheduled for review and update by June 30, 2022			
Pittsfield Elementary School	Scheduled for review and update by June 30, 2022			
Scarlett Middle School-Mitchell Elementary School COMPLEX	Scheduled for review and update by June 30, 2022			
Slauson Middle School	Scheduled for review and update by June 30, 2022			
Tappan Middle School	Scheduled for review and update by June 30, 2022			
Thurston Elementary School	Scheduled for review and update by June 30, 2022			
Westerman ECC	Scheduled for review and update by June 30, 2022			
Skyline High School	Scheduled for review and update by June 30, 2022			



= Manhole
= Catch Basin
= Inflitration Basin
= Sanitary
= Offsite MS4
= Property Line

North

2670 Sequoia Pkwy, Ann Arbor, Michigan 48103

Abbot Elementary School

Ann Arbor Public Schools

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

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= Manhole
= Drainage Receptor
= Open Pipe Outlet
= Offsite MS4
= Sanitary
= Property Line

North

2670 Sequoia Pkwy, Ann Arbor, Michigan 48103

Abbot Elementary School

Ann Arbor Public Schools

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

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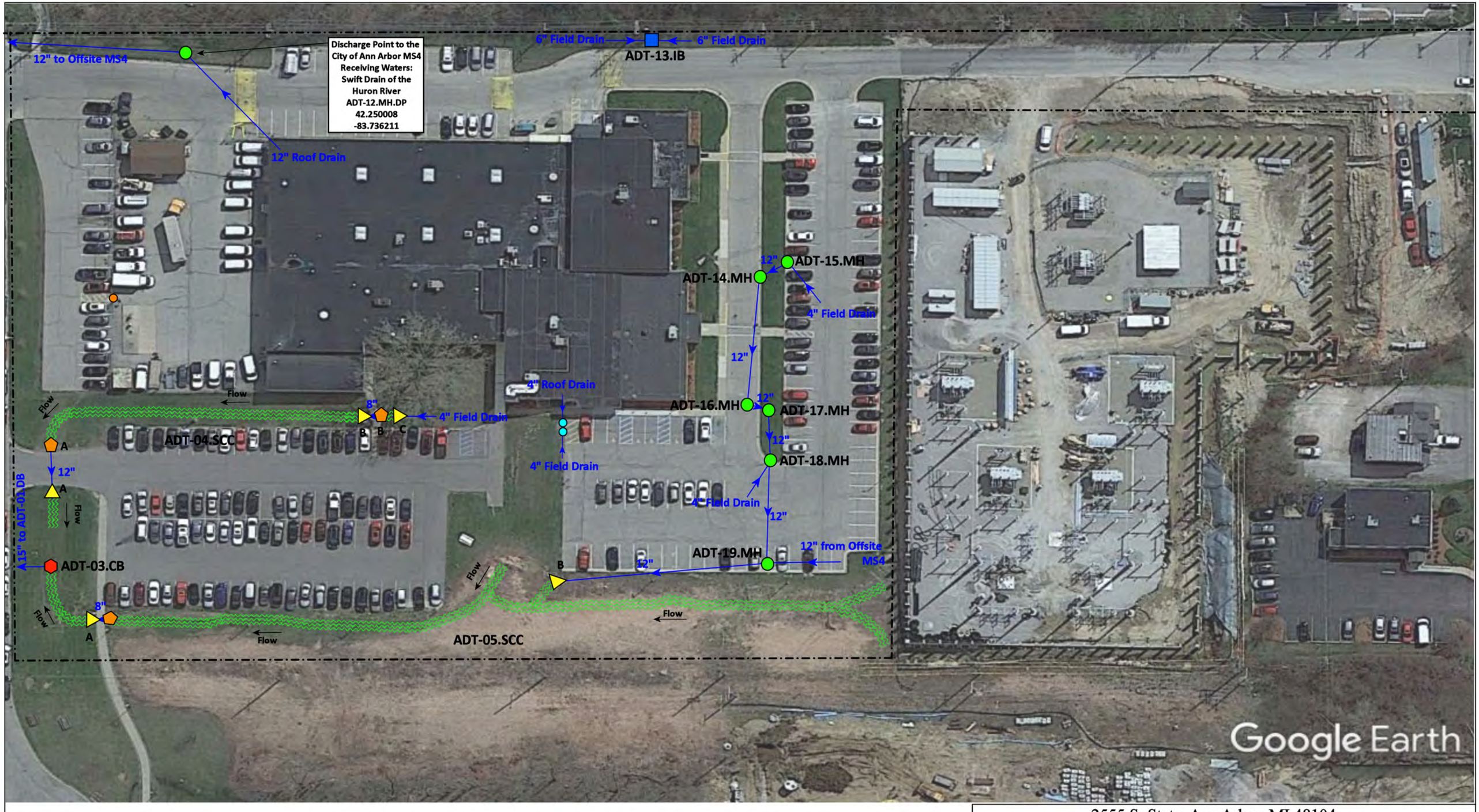

= Property Boundary
= Catch Basin
= Manhole
= Infiltration Basin

= Open Pipe Outlet
= Drainage Receptor
= Landscape Drain
= Sanitary

= Stormwater Conveyance Channel

North

2555 S. State, Ann Arbor, MI 48104

Administration & Transportation

Ann Arbor Public Schools

environmental group
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Farmington Hills, MI 48335
Phone: 248-426-0165
Fax: 248-427-0305

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= Property Boundary
= Sanitary
= Pond
= Open Pipe Outlet
= MS4 Structures
= Drainage Receptor
= MS4 Stormwater Conveyance Channel

North

2400 Boardwalk St, Ann Arbor, MI 48104

Administration & Transportation

Ann Arbor Public Schools

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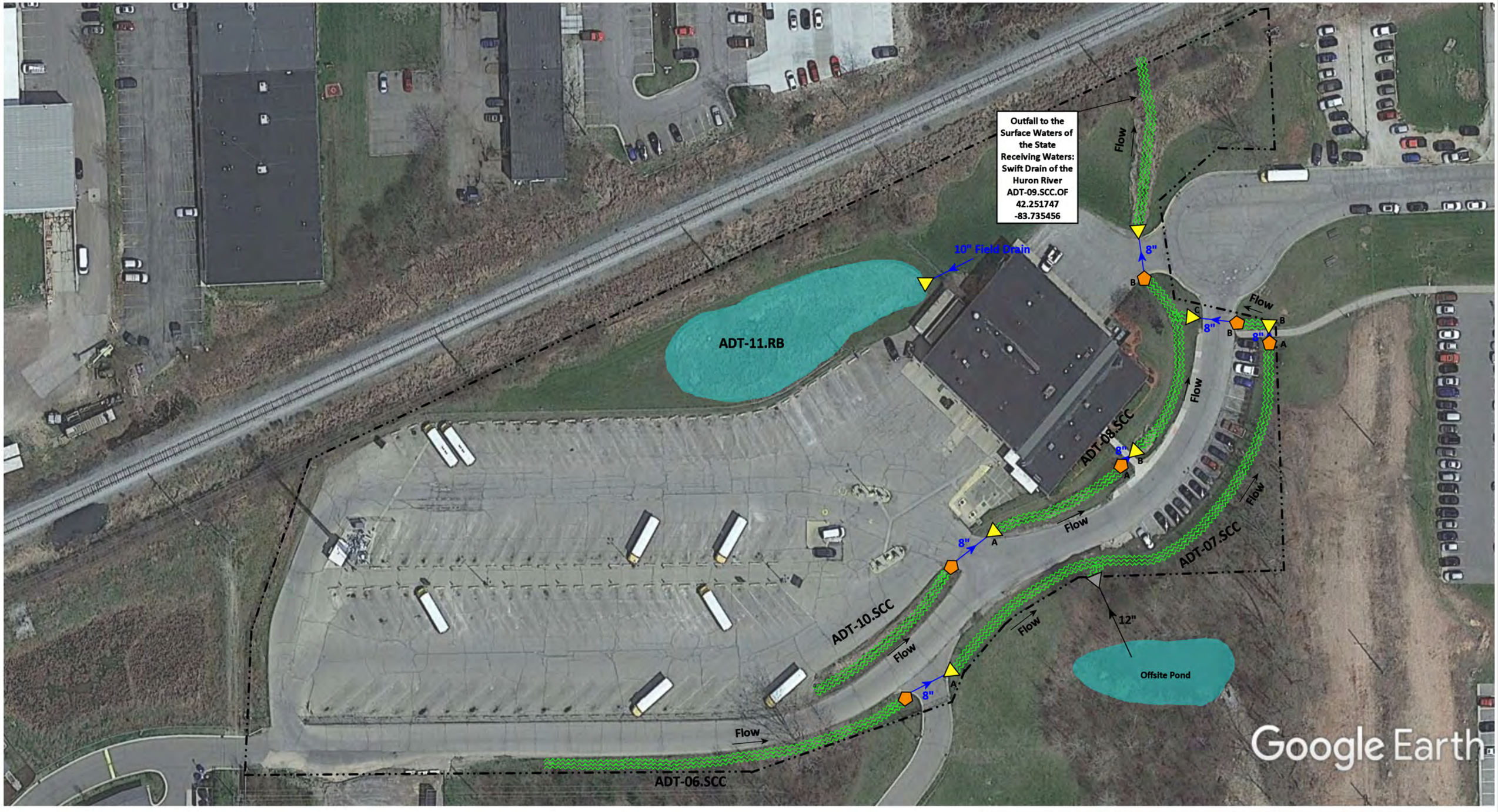

= Property Lines
= Open Pipe Outlet
= Drainage Receptor
= Offsite MS4
= Pond
= Stormwater Conveyance Channel

North

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Administration & Transportation

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environmental group
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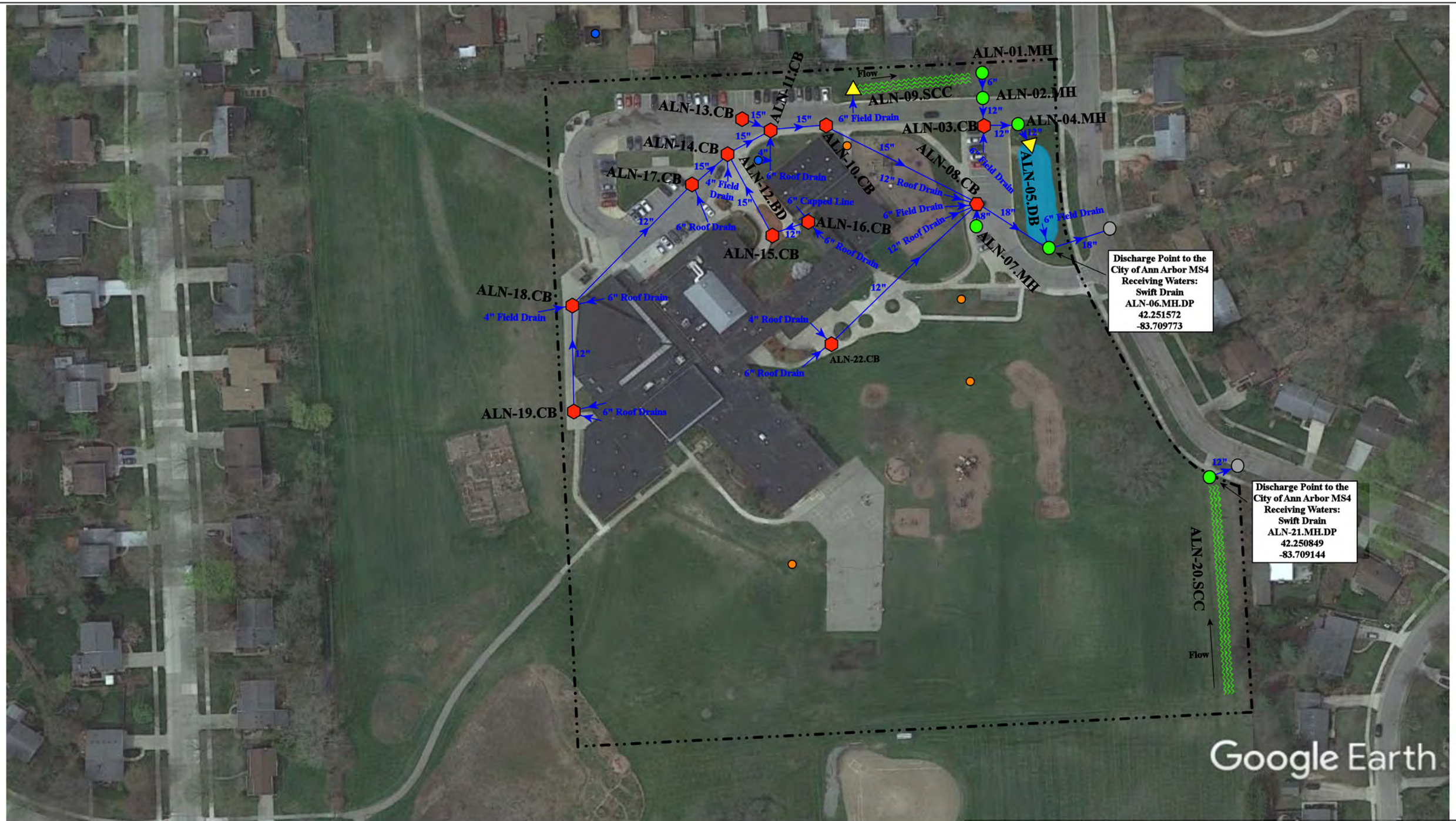

= Catch Basin

= Manhole

= Basin Drain

= Offsite MS4

= Open Pipe Outlet

= Stormwater Conveyance Channel

= Detention Basin

= Sanitary

= Property Boundary

North

2560 Towner Blvd, Ann Arbor, MI 48104

Allen Elementary School

Ann Arbor Public Schools

37720 Interchange Drive
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Angell Elementary School
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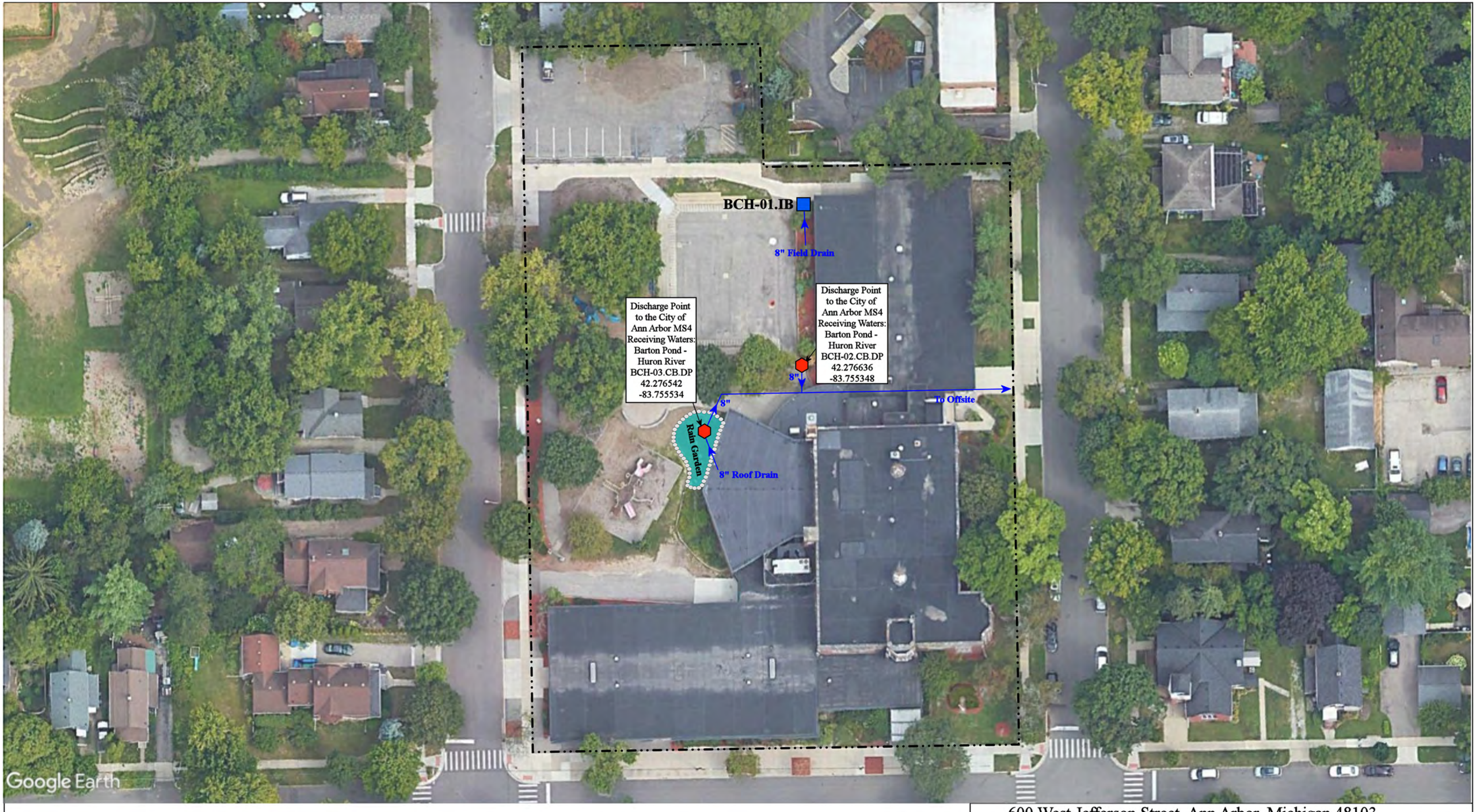
Red Oak Rd
Ann Arbor Open School



600 West Jefferson Street, Ann Arbor, Michigan 48103

= Property Line

= Infiltration Basin

= Catch Basin

North

Bach Elementary School

Ann Arbor Public Schools

37720 Interchange Drive
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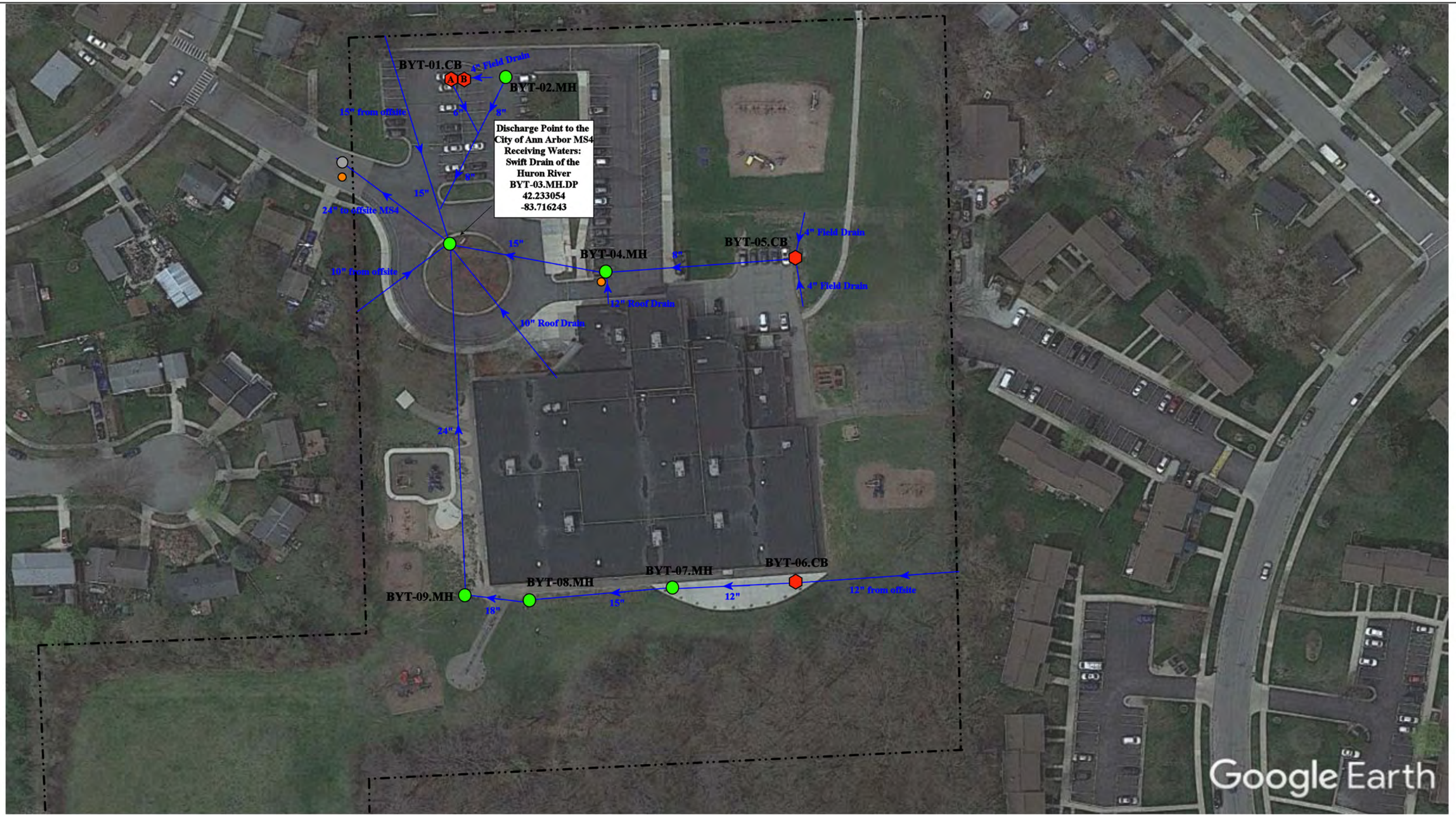

= Property Line
= Offsite MS4
= Manhole
= Sanitary Sewer
= Catch Basin

North

2150 Santa Rosa Drive, Ann Arbor, MI 48108

Bryant Elementary School

Ann Arbor Public Schools

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

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= Property Line

= Sanitary Sewer

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Bryant Elementary School

Ann Arbor Public Schools

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Fax: 248-427-0305

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Burns Park Elementary School
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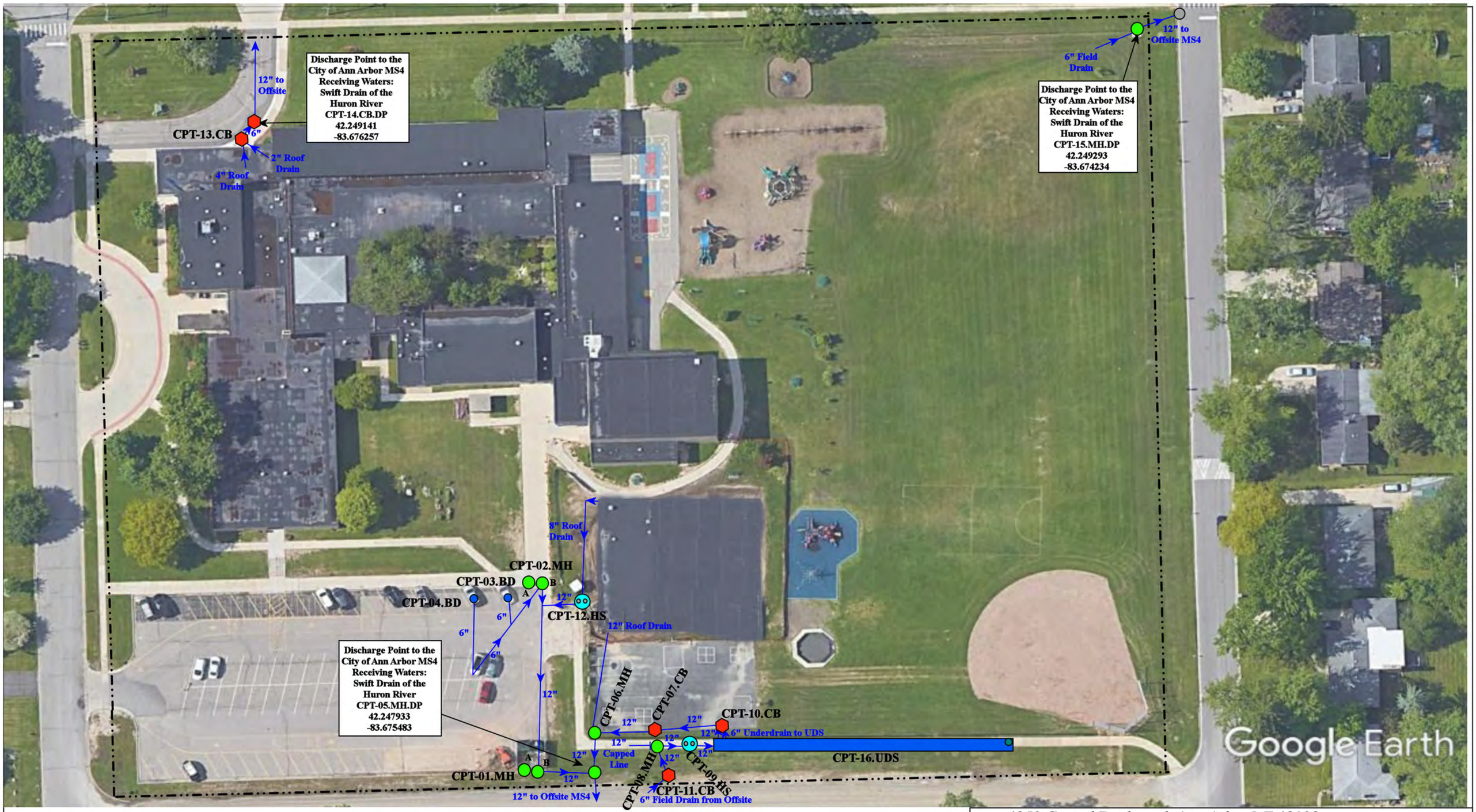

= Property Line
= Catch Basin
= Hydrodynamic Seperator
= Basin Drain
= Underground Detention Center
= Offsite MS4
= Manhole
= Underground Detention Center Access Lid

North

4250 Central Boulevard, Ann Arbor MI 48108

Carpenter Elementary School

Ann Arbor Public Schools

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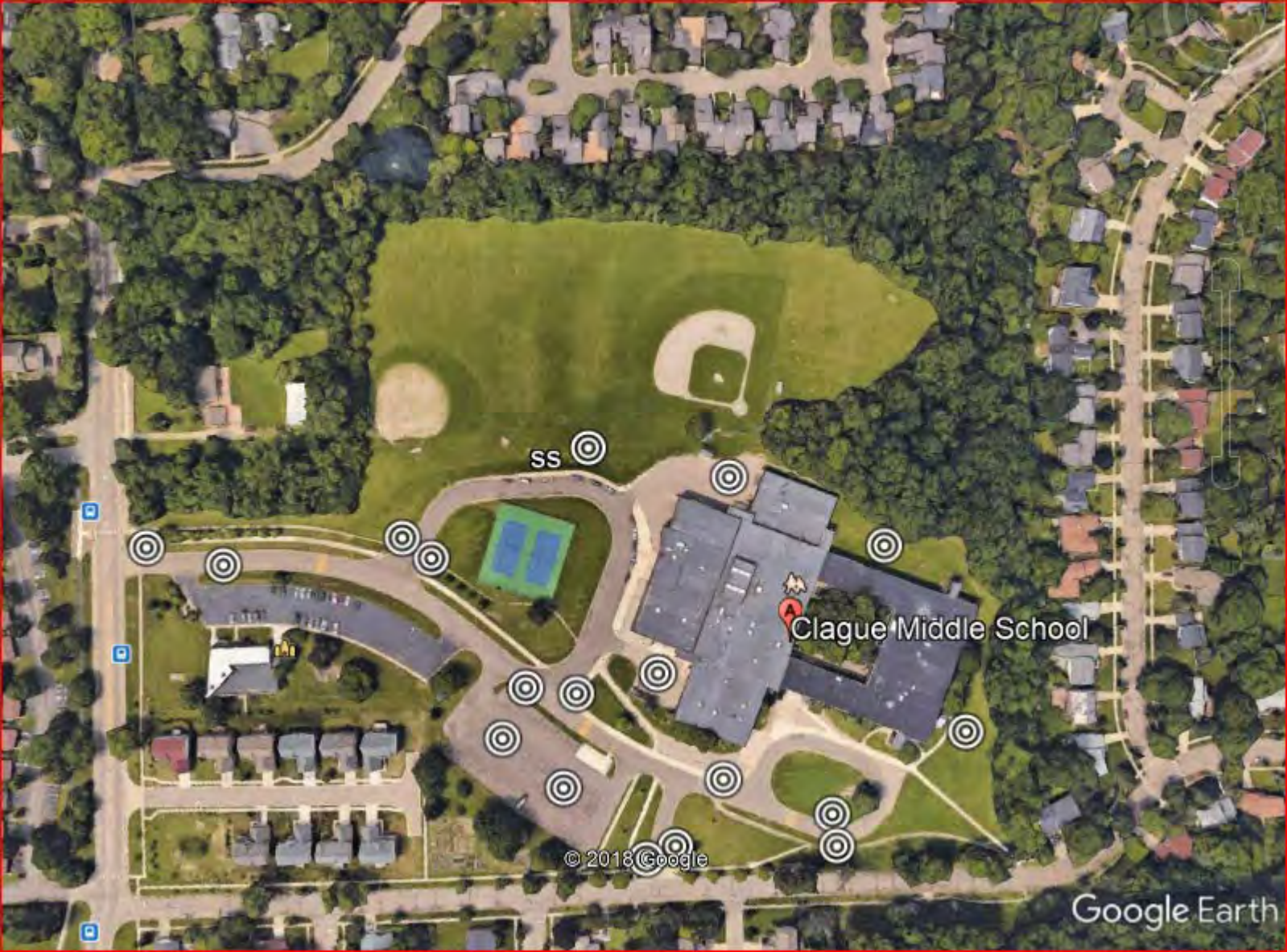
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Clague Middle School
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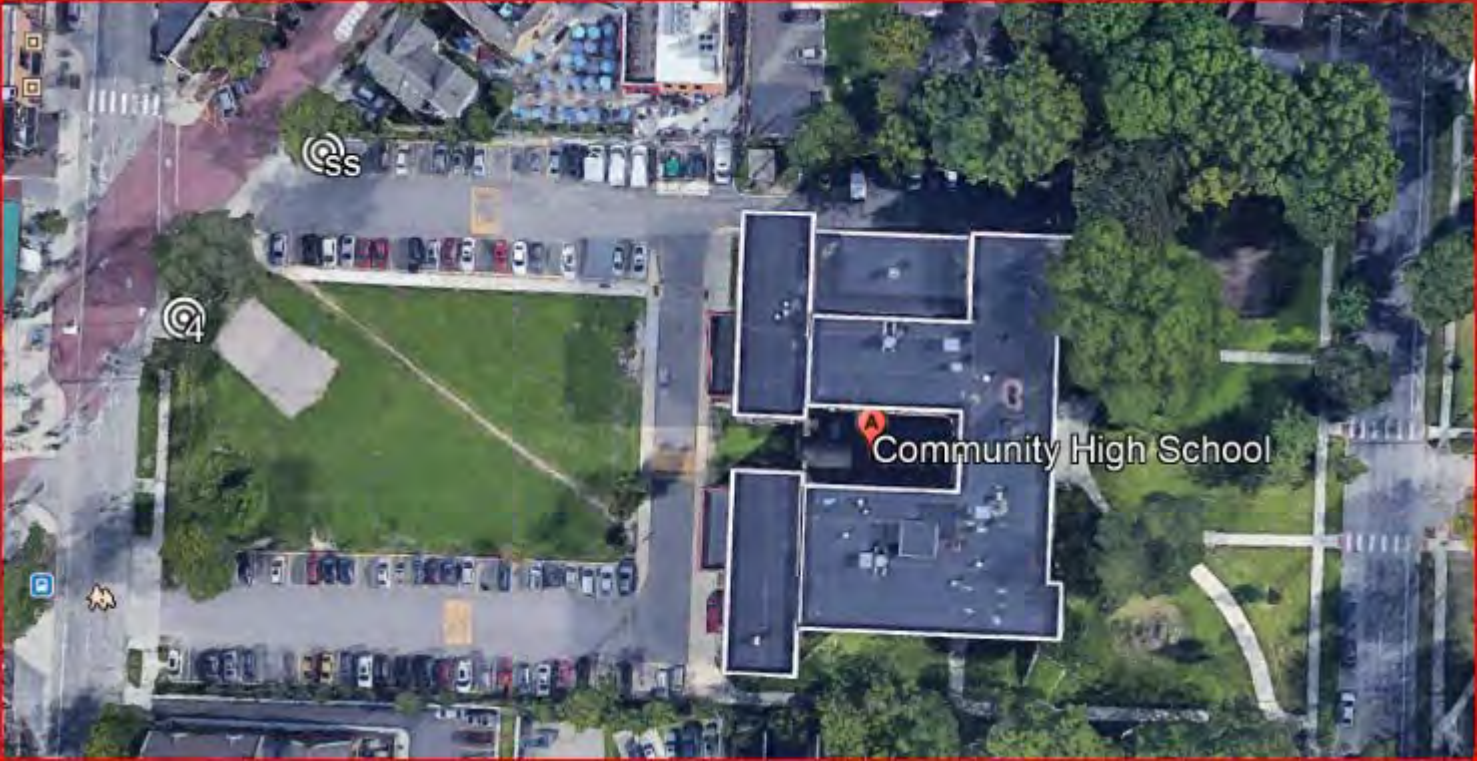
Community High School


Dicken School
© 2018 Google
Google Earth


SS
Eberwhite Elementary School
© 2018 Google
Google Earth

2081 East Ellsworth Road, Ann Arbor, MI 48108

···– = Property Lines

North

Ellsworth Road Parcel

Ann Arbor Public Schools

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

Revision Date :	5/7/2021
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Page #:	1 of 1
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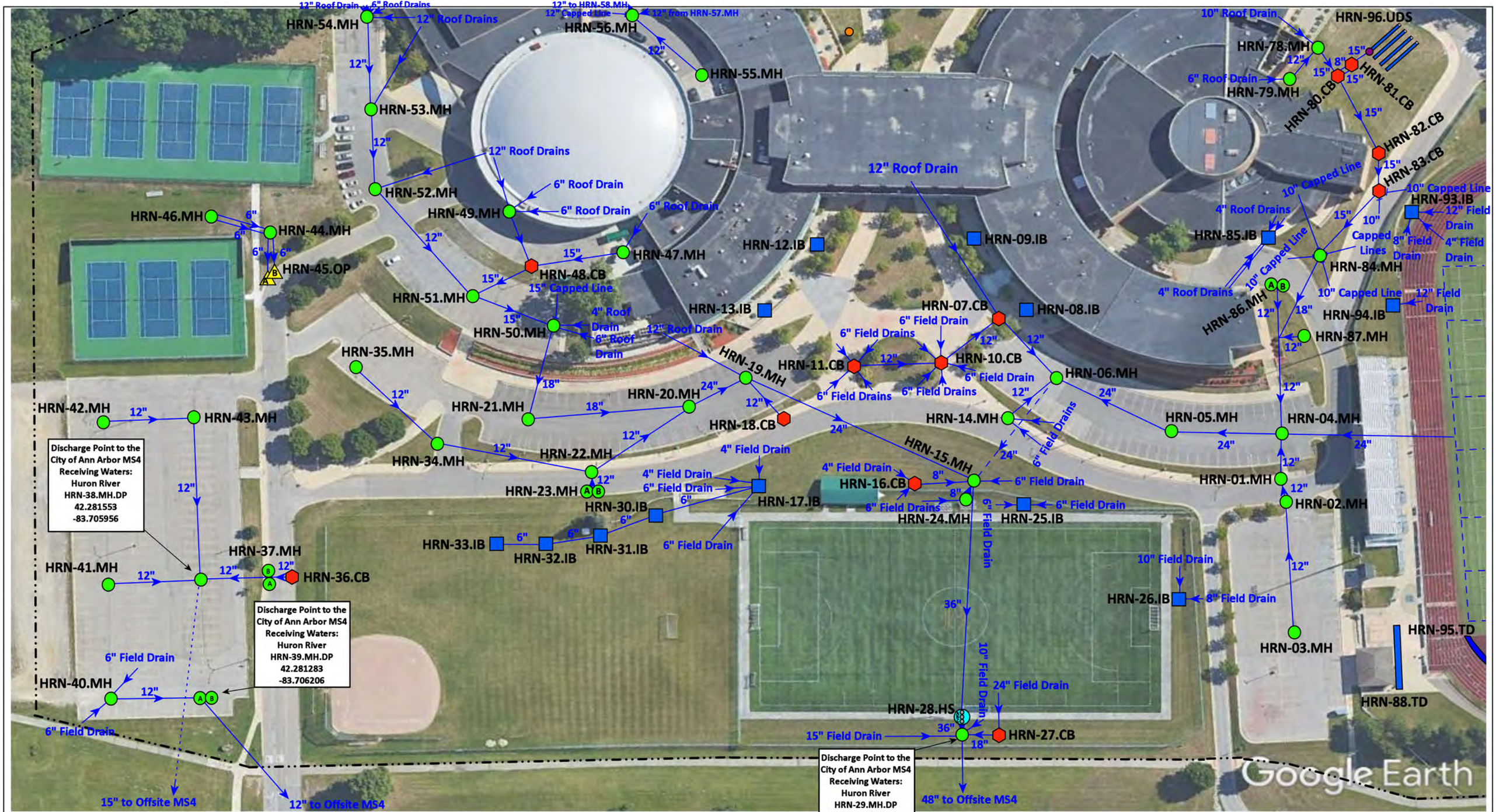
Forsythe Middle School
SS
© 2018 Google
Google Earth


Wines Elementary School
© 2018 Google
Google Earth
SS


Dixboro Ln
Freeman Environmental Education Cent
Deward Rd
Deward Dr
N Dixboro Rd
rd Rd


Haisley Elementary School



= Property Line
= Manhole
= Catch Basin
= Infiltration Basin
= Open Pipe Outlet
= Sanitary
= Hydrodynamic Separator w/ Access Lids
= Trench Drain
= UDS w/ Buried Access Lid and Cleanouts
= Turf Drainage System

North

2727 Fuller Road, Ann Arbor, Michigan 48105

Huron High School

Ann Arbor Public Schools

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

Revision Date :	10/02/2020
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Reviewed:	JP
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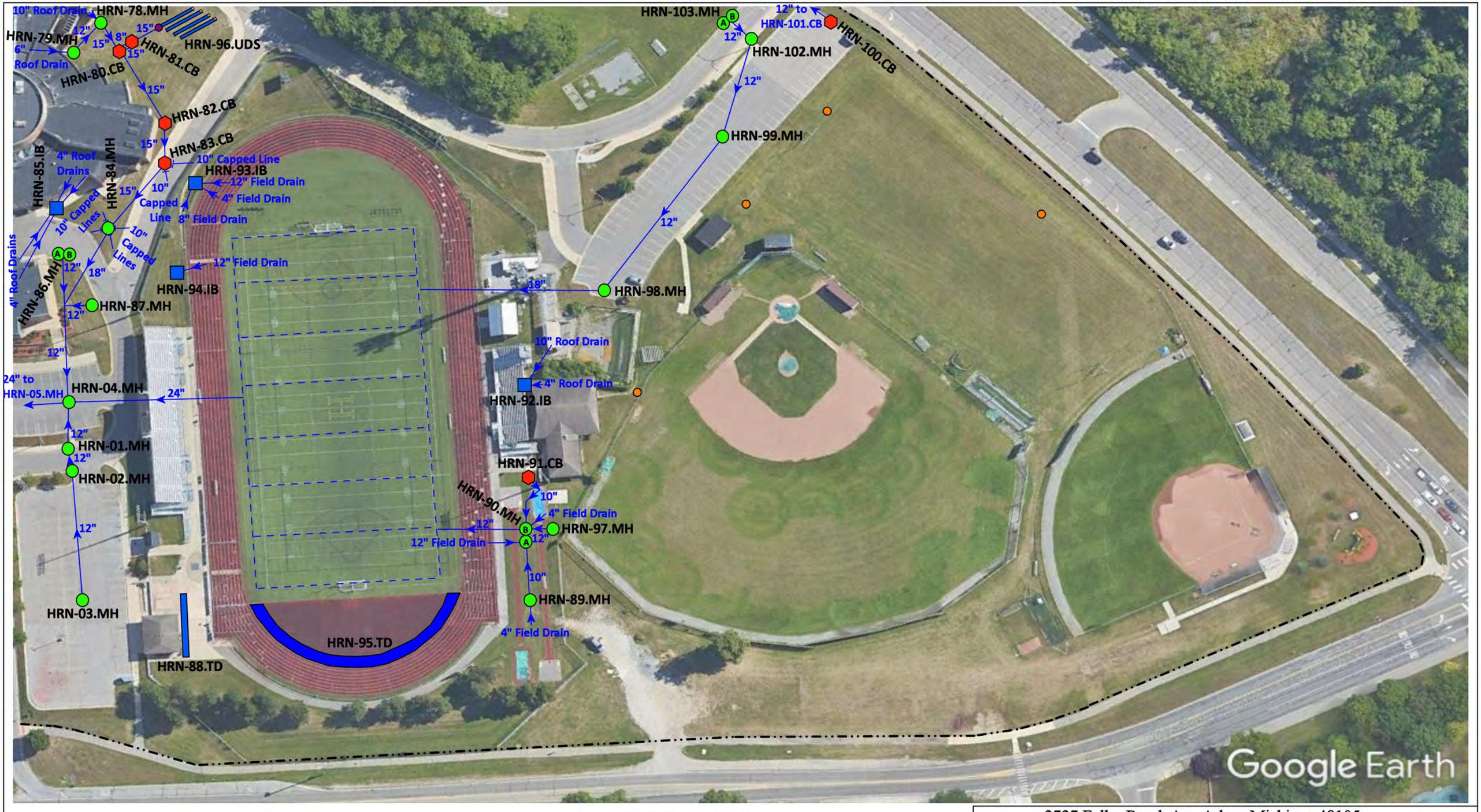

= Property Line
= Catch Basin
= Manhole
= Infiltration Basin
= Trench Drain
= Sanitary
= UDS w/ Buried Access Lid and Cleanouts
= Turf Drainage System

North

2727 Fuller Road, Ann Arbor, Michigan 48105

Huron High School

Ann Arbor Public Schools

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

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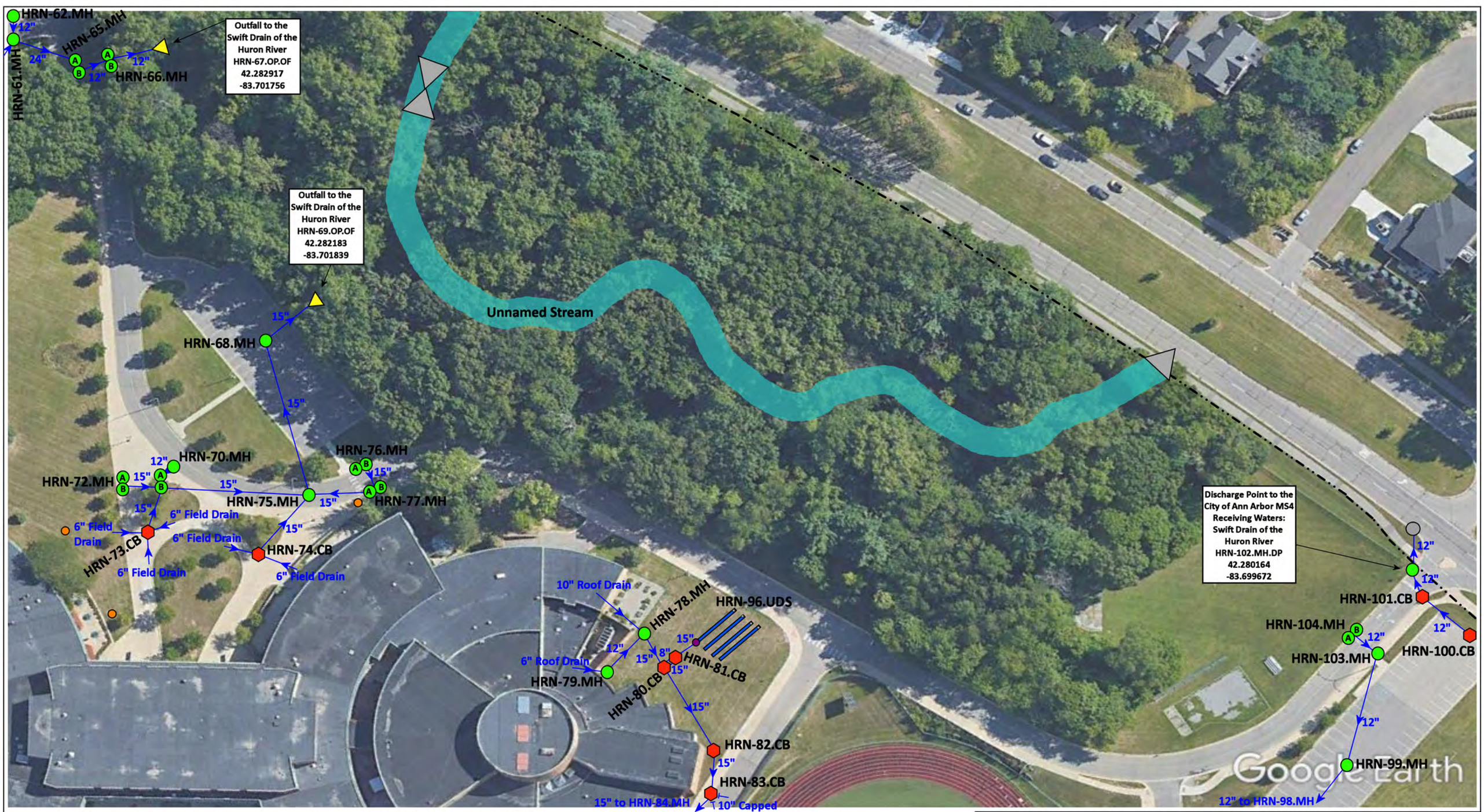

= Property Line
= Catch Basin
= Manhole
= Sanitary
= Open Pipe Outlet
= Offsite MS4
= Stream Culvert
= Stream
= UDS w/ Buried Access Lid and Cleanouts

North

2727 Fuller Road, Ann Arbor, Michigan 48105

Huron High School

Ann Arbor Public Schools

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

Revision Date :	10/02/2020
Drawn by:	KD
Reviewed:	JP
Page #:	3 of 4
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= Property Lines
= Catch Basin
= Manhole
= Open Pipe Outlet
= Sanitary
= Drainage Receptor

North

2727 Fuller Road, Ann Arbor, Michigan 48105

Huron High School

Ann Arbor Public Schools

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

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Martin Luther King Elementary School
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Google Earth


Lakewood Elementary School
SS
© 2018 Google
Google Earth


ss
Lawton Elementary School
© 2018 Google
Google Earth


Logan Elementary School
SS
© 2018 Google
Google Earth

= Property Boundary
= Catch Basin
= Drainage Receptor
= Infiltration Basin
= Offsite MS4
= Open Pipe Outlet
= Stormwater Conveyance Channel

North

2800 Stone School Rd, Ann Arbor, MI 48104

Pathways to Success Academic Campus

Ann Arbor Public Schools

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

Revision Date :	10/02/2020
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Reviewed:	KD
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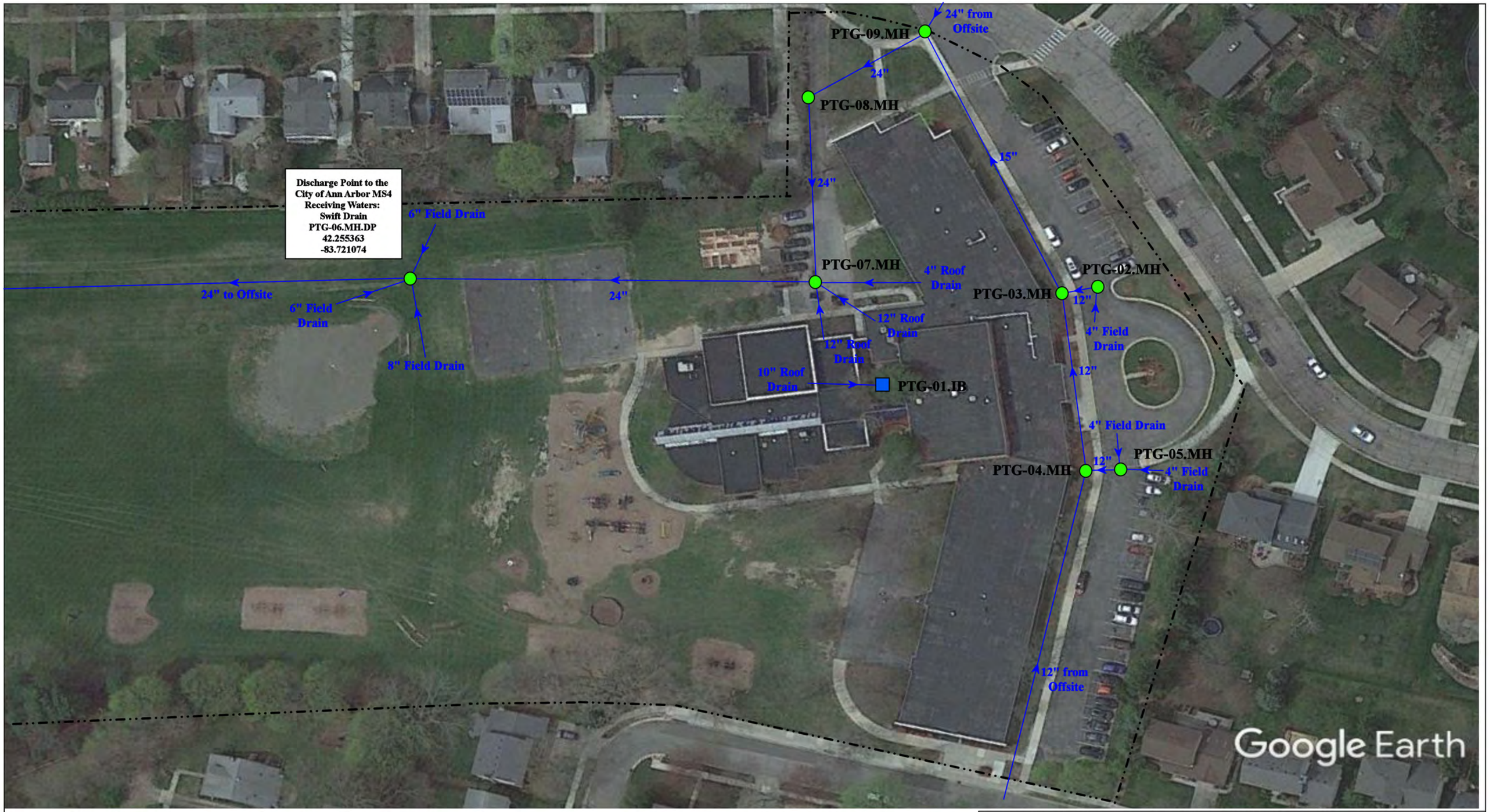

= Property Line

= Manhole

= Infiltration Basin

North

2100 Crestland Dr, Ann Arbor MI 48104

Pattengill Elementary School

Ann Arbor Public Schools

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

Revision Date :	11/13/2020
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= Property Line

North

2100 Crestland Dr, Ann Arbor MI 48104

Pattengill Elementary School

Ann Arbor Public Schools

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

Revision Date :	11/13/2020
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Reviewed:	KD
Page #:	2 of 2
Scale:	Not to Scale


Pioneer High School
© 2018 Google


Pittsfield Elementary School
SS
SS
SS
SS
SS
SS
SS
© 2018 Google
Google Earth
2000
42°15'00.14" N 83°41'30.36" W elev 820 ft eye alt 1548 ft


Scarlett Middle School
© 2018 Google
Google Earth


Mitchell Elementary School
SS
© 2018 Google
Google Earth


Skyline High School
©2018 Google
Google Earth


Slauson Middle School
© 2018 Google
Google Earth


Tappan Middle School
© 2018 Google
Google Earth


Thurston Elementary School
© 2018 Google
Google Earth


Westerman Preschool and Family Center
Oakbrook Dr

-·-·-· = Property Boundary

North

2552 N Maple Rd, Ann Arbor, MI, 48103

Skyline High School

Ann Arbor Public Schools

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

Revision Date :	Date
Drawn by:	Initials
Reviewed:	Initials
Page #:	1 of 1
Scale:	Not to Scale

= Property Boundary

North

2552 N Maple Rd, Ann Arbor, MI, 48103

Skyline High School

Ann Arbor Public Schools

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

Revision Date :	Date
Drawn by:	Initials
Reviewed:	Initials
Page #:	1 of 1
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2552 N Maple Rd, Ann Arbor, MI, 48103

-·-·-·- = Property Boundary

North

Skyline High Shcool

Ann Arbor Public Schools

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

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Appendix "B"

Enforcement Policies and Tracking Forms

November 1, 2020
Revised: May 23, 2021

Municipal Separate Storm Sewer System Noncompliance Enforcement Tracking
Ann Arbor Public Schools
Permit No. MI0060234

Report Number	Name	Date	Location of Violation	Business/ Organization	Description of Violation	Description of Enforcement Response	Compliance Schedule Date	Date Violation Resolved
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								

Stormwater Management – Illicit Discharge Regulatory Policy

Issue date: December 1, 2020
Permit Number: MI0060234
Ann Arbor Public Schools

This illicit discharge regulatory policy was developed as a regulatory policy for prevention of pollution from storm water runoff and to protect the quality of the waters of the State of Michigan through the regulation of non-stormwater discharges to the municipal separate storm sewer system (MS4) to the maximum extent practicable as required by federal and state law. This regulatory mechanism establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit through the Michigan Department of Environment, Great Lakes, and Energy (EGLE). The objectives of the regulatory mechanism are:

1. To regulate the contribution of pollutants to the MS4 by stormwater discharges by any user.
2. To prohibit illicit connections and discharges into the MS4.
3. To establish authority to investigate, inspect, and monitor suspected illicit discharges.

Illicit Discharge means any discharge to, or seepage into the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater except discharges pursuant to an NPDES permit.

Illicit Connection means a physical connection to the MS4 separate stormwater system that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4 separate storm sewer system; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

Prohibitions of Illicit Discharges

1. Prohibition of Illicit Discharges:
    a. Ann Arbor Public Schools prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.
    b. No person shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw, drain, or otherwise discharge into the MS4 any pollutants or waters containing any pollutants, other than stormwater.

2. The following discharge is **not prohibited**:
    a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the Ann Arbor Public Schools MS4. Discharge or flows from firefighting activities will be addressed only if they are identified as significant sources of pollutants to surface waters of the state.

b. The following activities are **not prohibited** under this policy unless they are determined to be significant sources of pollutants to surface waters of the state:
    - Water line flushing and discharges from potable water sources.
    - Landscape irrigation runoff, lawn water runoff, and irrigation waters.
    - Diverted stream flows and flows from riparian habitats and wetlands.
    - Rising groundwater and springs.
    - Uncontaminated groundwater infiltration and seepage.
    - Uncontaminated pumped groundwater, except groundwater cleanups specifically authorized by NPDES permits.
    - Air conditioning condensation.

Prohibition of Illicit Connections

1. The construction, use, maintenance, or continued existence of illicit connections to the MS4 is prohibited.
2. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
3. A person is in violation of this regulatory mechanism if the person connects a line conveying sewage to the MS4 or allows such a connection to continue.
4. Improper connections in violation of this regulatory mechanism must be disconnected and redirected.
5. Illicit discharge and connections will be eliminated immediately.

Enforcement

The District Stormwater Program Manager will administer and enforce the stormwater management program, including investigate, inspect, and monitor suspected illicit discharges or illicit connections.

If you witness or think a discharge is taking place, please contact the Ann Arbor Public Schools Physical Properties at 734-994-8118.

District Illicit Discharge/Illegal Dumping Reporting Form
Ann Arbor Public 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 ENFOREMENT 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:_____

Stormwater Management - Post-Construction Policy & Procedure

Issue date: May 23, 2021

Applies To: As required by the National Pollutant Discharge Elimination System (NPDES) permit for Ann Arbor Public Schools, the scope of this Guideline includes all development and redevelopment projects on District properties that involve either:

a. earth disturbance of one (1) acre or greater,
   OR
b. earth disturbance of less than one (1) acre, but which are part of a larger common plan of development or sale that would disturb one (1) acre or more.

Post-Construction Requirements Policy Statement

Ann Arbor Public Schools development and redevelopment projects on District property are regulated under and must comply with the Ann Arbor Public Schools NPDES permit for stormwater discharges, as issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Stormwater Management Post-Construction Requirements Guideline has been developed to provide guidance regarding responsibilities and actions to meet the NPDES permit conditions for development and redevelopment projects on district properties, which include but are not limited to, all district owned properties.

Post-Construction Plan for Stormwater Management

The post-construction plan for stormwater management on regulated sites **must** include:

- A minimum treatment volume standard to address water quality impacts.
- Channel protection criteria to address resource impairment resulting from flow volumes and rates.
- Review 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 to ensure that infiltration BMPs do not exacerbate existing conditions. 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.
- Drawings showing the location of stormwater control measures and the storm system.
- Details on the proposed stormwater control measures.
- Operation & Maintenance (O&M) requirements.
- Supporting information
    - Calculations used for designing all components of the stormwater management systems.
    - Total Suspended Solids (TSS) design removal rates and supporting manufacturer documentation, if applicable.
    - Geotechnical report including soil boring and infiltration test data.

The project team [Architecture, Engineering & Construction, Other Project Manager, Project Developer and/or Contractors] shall develop the post-construction stormwater management plan in accordance with this guideline and the NPDES permit.

Water Quality Treatment Volume Standard

The minimum treatment volume standard **must** be either:

- Treat the first one (1) inch of runoff from the entire site.

Total Suspended Solids

The treatment methods must be designed on a site-specific basis to achieve the following:

a. A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff.
   OR
b. 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.

Channel Protection Criteria

The channel protection criteria must maintain post-development site runoff volume and peak flow rate 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. More restrictive channel protection criteria may be utilized on a case-by-case basis, as appropriate.

There may be instances where site conditions (e.g., space limitations or tight soils that prevent infiltration) challenge or prohibit feasibility of maintaining the project site's pre-development runoff levels for all storms up to the 2-year, 24-hour event, off-site mitigation or increase the required detention volume by up to an additional 20%. To manage that portion of proposed runoff that is not managed through infiltration or other upline BMPs, detention basins will be designed to capture and treat up to a 100-year recurrence interval storm event. Retention basins with no outlet will be capable of storing two consecutive 100-year recurrence interval storms.

Off-Site Mitigation

Ann Arbor Public Schools shall seek alternative compliance where unable to fully implement stormwater controls on-site due to poor site conditions.

- Off-site mitigation refers to BMPs implemented at a location different from the original project site.
- Watershed refers to the area represented by a 10-digit Hydrologic Unit Code.
- Sewershed refers to the area where stormwater is conveyed by an MS4 to a common outfall or point of discharge.

Off-site mitigation requires that off-site location be located within the same jurisdiction and watershed/sewershed as the original project. The highest preference shall be given to locations that yield benefits to the same receiving water that received runoff from the original site.

The following criteria will be considered when determining the physical constraints of the project site:

- Limited size of the lot outside of the building footprint to create the necessary infiltration capacity even with amended soils. The district shall consider small BMPs spread across the entire site rather than on large BMP prior to offsite mitigation.
- Soil instability as documented by a thorough geotechnical analysis.
- A site use that is inconsistent with capture and reuse of storm water.
- The potential water quality impact from the original project site and the benefits realized at the off-site location. For example, the water quality impact from a site with a discharge to a small-sized stream would be greater than a site on a larger river and an offset downstream of the project site may provide less water quality benefit.

A second set of infeasibility criteria include:

- Poorly draining soils
- Bedrock
- High groundwater, or the potential of mounded groundwater to impair other uses
- Stormwater hot spots (includes Part 201 and Part 213 sites, and areas of soil orgroundwater contamination)

A justification as to the infeasibility of fully meeting the post-construction storm water runoff control requirements on site will be prepared and submitted during the progress report. When site conditions enable the district to retain at least the volume of stormwater associated with a 0.4 inch rain event, remaining off-site compliance will be provided at a 1:1.5 ratio. When this minimum cannot be met onsite, a 1:2 ratio applies. Off-site mitigation projects be completed within 24 months after the start of the original project site construction.

Operations & Maintenance Plans

All structural and vegetative stormwater control measures installed as a requirement under this section of the permit shall include a plan for maintaining maximum design performance through long-term operation and maintenance.

Enforcement

The Ann Arbor Public Schools Stormwater Program Manager will administer and enforce the stormwater management program, including maintaining procedures, guidance, information, etc. to aid district staff and contractors in complying with the post-construction requirements for stormwater management.

Appendix "C"

HRWC Collaborative Plans

November 1, 2020
Revised: May 23, 2021

Memorandum of Understanding

Cooperative Illicit Discharge Elimination Program Elements

November 3, 2020

Note: This Memorandum is being submitted to comply with parts of NPDES stormwater permit (as listed below).

By signing this Memorandum of Understanding (MOU) and including it with a stormwater permit application for the identified Municipal Separate Storm Sewer System (MS4), the MS4 representatives agree, in principle, to abide by the MOU terms and guidelines. For purposes of this MOU, the Huron River Watershed is limited to the census defined urbanized area within the Huron River watershed in Washtenaw County. The primary purpose of the MOU is to establish cooperative elements of dry-weather screening programs to detect and eliminate illicit discharges to MS4s owned or operated by any of the signatories, and ultimately remove pollutants from the river systems (or waters of the State).

This MOU will accompany applications to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for MS4 stormwater discharge permits under the National Pollutant Discharge Elimination System (NPDES). The MOU is submitted to address portions of permit application elements under section VII.10 through VII.17.

We the undersigned acknowledge the importance of illicit discharge elimination programs (IDEP) for improving and protecting surface waters of the State as valuable water resources for the residents, aquatic life, and wildlife, and agree to the following:

1. All signatory MS4 owners or operators have or will develop IDEP plans and will submit details of these plans or programs as part of a Storm Water Management Plan (SWMP), to apply for an NPDES permit to discharge stormwater to waters of the state.

2. As part of the permit application, each IDEP will include procedures for performing field observations at outfalls identified in priority areas. Each MS4 will identify a method for

prioritizing areas or outfalls within their jurisdiction. Watershed-wide priorities will be discussed at watershed group meetings for inclusion in MS4 IDEP programs.

3. On at least an annual basis, the Huron River Watershed Council (HRWC) will share results of its Chemistry and Flow Monitoring Program with signatory MS4s. Results will include data on nutrients and bacteria from short and long-term surface water sites throughout the watershed. HRWC will recommend priority drainages for IDEP. Signatory MS4s will utilize the results to determine or update priority areas and prioritize field observations at outfalls upstream of monitoring sites with water quality impairments (potential illicit discharge areas). The HRWC will review the periodic stormwater reports from signatory MS4s so that HRWC can better identify future monitoring sites.

5. In situations where one MS4 discharges into a downstream MS4, the *downstream MS4* will do the following:
   A. Conduct field observations following procedures and schedules established in its SWMP. Any agreement for sharing the cost of such outfall screening will be made separate to this MOU.
   B. In the event that a potential illicit discharge is observed, downstream MS4 staff will conduct field screening and perform a source investigation following procedures in its SWMP.
   C. If the source of an illicit discharge is traced back to an upstream MS4 point of discharge, downstream MS4 staff will contact the designated upstream MS4 staff and provide them with investigation details and any lab analysis results within 24 hours of receipt by the downstream MS4 staff. Downstream MS4 staff will report any discharge of pollutants to waters of the state to the EGLE following procedures in its IDEP plan.

6. In the event that an illicit discharge is reported by a downstream MS4 as emanating from the upstream MS4, the upstream MS4 will do the following according to schedules and procedures in their IDEP:
   A. MS4 staff will implement the procedure for performing a field observation and source investigation as appropriate in accordance with their IDEP.

B. Following completion of source investigation, MS4 staff will communicate a report of results, including notification to the next upstream MS4 if that is the confirmed origination of the illicit discharge, in their periodic stormwater report to the EGLE.
C. If an illicit discharge source is identified, the upstream MS4 will pursue remedial action with the source, as identified in its IDEP.

7. If an illicit discharge has been eliminated, staff will document the closure of the detection incident according to their agency's procedures.

8. In the event of an unresolved illicit discharge detection that was originally traced to a discharge point from the upstream MS4, the upstream MS4 will assume the responsibility of investigating the discharge and any follow-up actions in accordance with its IDEP.

9. Any signatory may terminate its involvement in this MOU at any time for any reason. Notice of such termination shall be given in writing to all other signatories prior to the effective date of termination. In such an event, the permittee terminating involvement in this MOU shall notify the EGLE prior to terminating and submit a revised application with an updated IDEP.

10. This MOU shall cover the duration of the NPDES permits issued on dates with closest proximity to the signed dates of this MOU. The signatories may agree to renew the MOU.

11. No signatory makes any admission of fact or law, or waives any claim, right, or argument against anyone or any entity by becoming a signatory to this MOU or by acting under it. Nothing in this MOU shall create any claim, right, or argument in any third party.

by [MS4 organization]:

Ann Arbor Public Schools — November 3, 2020

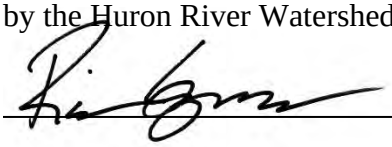
[Name and Title] — Date

by [MS4 organization]:

Ann Arbor Public Schools Stormwater Operator — November 3, 2020

[Name and Title (if necessary)] — Date

by the Huron River Watershed Council:



November 3, 2020

Ric Lawson (Watershed Planner) — Date

Public Participation Program for the Huron River Watershed MS4s in Washtenaw County

Updated November 3, 2020

The Public Participation Program is required by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) NPDES Storm Water Discharge Permit application.

The purpose of this Public Participation Program (PPP) is to facilitate the involvement of Municipal Separate Stormwater Sewer Systems (MS4s) in the watershed, and the general public in the revision of MS4 Storm Water Management Plans (SWMPs). This PPP is designed to involve all entities in the watershed with the authority, ability, and desire to carry out the implementation of SWMPs in commenting and implementing those plans.

I. General Information

This Public Participation Program is submitted by the Huron River Watershed Council (HRWC) on behalf of the following Phase I and II MS4s within the Huron River Watershed:

City of Ann Arbor
Ann Arbor Public Schools
Barton Hills Village
City of Dexter
Eastern Michigan University
Pittsfield Charter Township
City of Ypsilanti
Ypsilanti Charter Township
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission
University of Michigan

II. Communication During the SWMP Revision Process

The MS4s listed in the previous section participate in a watershed group to draft and implement stormwater management plans. MS4s in Washtenaw County formed the Middle Huron River Stormwater Advisory Group (SAG) and Middle Huron Partners (MHP). HRWC facilitates this group. Significant effort was engaged by these entities previous stormwater permits to reach out to potential stakeholders and the public at large. Further, public involvement was considered in the development of a Watershed Management Plans. As part of these efforts and others, a number of on-going citizens groups have been formed. These include creek groups for a number of tributary drainages. The MHP will continue to participate with and recruit representation from these important citizens groups.

The practices listed in this section will be used to solicit public participation during the SWMP development process for each MS4. Public input shall be encouraged in all aspects of the storm water management program. The following minimum actions shall be taken to encourage public input:

1. The watershed permittees shall follow local public notice requirements, as appropriate, when notifying the public that a storm water management program must be implemented. Copies of the SWMP shall be available for public inspection, and the public shall be notified of when and

where it is available.
2. The MS4s shall continue to participate in watershed groups that are open to public participation for the purpose of encouraging public involvement in all aspects of the storm water management program.
3. The MS4s shall cooperate with the HRWC, by informing them of activities under the storm water management program, providing copies of the SMWPs and pursuing input on the plans, seeking volunteer assistance including water quality monitoring assistance, and seeking ways to meet general permit requirements by assisting the local organizations with their ongoing programs for water resource protection and enhancement.

The following Best Management Practices (BMPs) will be carried out to meet public participation requirements:

BMP 1.1. **Public Notice**
Description: MS4s will provide electronic copies of draft SWMPs to HRWC to share with the general public. HRWC will notify the public that SWMPs were developed and encourage public input in the revision process. This will be done primarily through:

- Posting SWMPs on the HRWC website.
- Sending out an electronic notice to Huron River Watershed Council public contact lists.
- Publicizing the SWMP review process via the HRWC newsletter and press releases.
- Posting each SWMP on individual MS4 websites.

In addition, several other means of communication will be utilized for announcing progress and soliciting input. These may include any of the following:

1. Printing a notice in the local news media.
2. Announcements/updates to local boards, associations, and other interested groups by HRWC and watershed group members
3. Articles in local newsletters
4. Public meetings
5. Web site(s), RSS and social networking sites
6. Announcements at major public events

MS4s will follow any public notice requirements specific to their local jurisdiction. The same public notice procedure will be used following any major SWMP revision.
Timeline: Initial notice will be provided no later than 15 days following the release of a draft permit.
Evaluation: Publication of notice in news media, hits on main website.
Responsible Parties: Each listed MS4 will provide SWMPs and HRWC will notify the public within the watershed. MS4s will notify public in their local jurisdiction.

BMP 1.2 Public Access to Storm Water Management Plans
Description: HRWC and the MS4s will publish and make available copies of the SWMPs on the HRWC website, MS4 websites and MS4 offices.
Timeline: Following review by EGLE and revision by MS4s. SWMPs will be made available when the draft permit becomes available for public review.
Evaluation: Number of views each of the plans get at each website
Responsible Parties: HRWC and individual MS4s

BMP 1.3 Watershed Groups
Description: The Middle Huron Partners is a watershed implementation group that is open to and encourages public participation. This group meets three times a year (on average) on an as needed basis. Meeting schedules are shared via e-mail distribution lists. Meetings of this group

will be the primary point of public input into SWMP implementation and provide feedback to MS4 representatives.
Timeline: on-going; start in year one of permit
Evaluation: Document MS4 representative and citizen participation;
Responsible Parties: MS4 representatives, HRWC

BMP 1.4 SWMP Review
Description: Following public notice of the SWMPs, HRWC will share comments with MS4s and MS4s will accept and consider comments from the public and EGLE. After revising SWMPs, HRWC will post revised and final drafts of each MS4's SWMP. Following initial implementation, feedback will be solicited through watershed group meetings. Toward the end of the permit cycle, MS4s will determine if a major revision of SWMPs are necessary. If so, the same public notice and revision process will be followed as with the initial draft and revision.
Timeline: Review completed following initial application and prior to permit issuance. SWMP revision considered by year 5 of permit cycle.
Evaluation: Comments from the general public.
Responsible Parties: HRWC and MS4s

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE PUBLIC EDUCATION PLAN

Effective upon NPDES Permit issuance for a period of five (5) years.

Ann Arbor Public Schools
Barton Hills Village
Brighton Township
Charter Township of Ypsilanti
City of Ann Arbor
City of Brighton
City of Dexter
City of Ypsilanti
Eastern Michigan University
Livingston County Drain Commissioner
Livingston County Road Commission
Pittsfield Charter Township
University of Michigan
VA Ann Arbor Healthcare System
Village of Pinckney
Washtenaw County Road Commission
Washtenaw County Water Resources Commissioner

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I. INTRODUCTION

Purpose of Public Education Plan

In accordance with the permit requirements for Federal Phase II Storm Water Regulations, this Public Education Plan (PEP) was prepared to instill within the residents, businesses, and officials of the communities in regulated watersheds a heightened level of awareness of the connection between individual actions and the health of their watershed and water resources. The objective of this plan is to promote, publicize, and facilitate watershed education for the purpose of encouraging the public to reduce the discharge of pollutants in storm water.

Federal Phase II Storm Water Regulations

A 1987 amendment to the Federal Clean Water Act required the U.S. Environmental Protection Agency (EPA) to develop regulations setting forth National Pollutant Discharge Elimination System (NPDES) permit application requirements for storm water discharges from municipal separate storm sewer systems (MS4s). An MS4 is a drainage system that discharges to waters of the State and is owned or operated by a federal, state, county, city, village, township, district, association or other public body of government. Such drainage systems may include roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels.

Phase I of the NPDES regulations went into effect in 1990, which regulated discharges from communities with populations greater than 100,000. The rules for Phase II of the NPDES regulations were issued in 1999, requiring storm water discharge permits for communities with populations under 100,000 that have MS4s in “urbanized areas” as defined by the U.S. Bureau of the Census.

In Michigan the Michigan Department of Environmental Quality (MDEQ) is administering the federal Phase II permitting process.

Required Public Education Plan Elements

The PEP program is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in stormwater to the maximum extent practicable. The plan describes current and proposed best management practices (BMPs) to meet the minimum control measure requirements in a Public Education Plan (PEP).

The PEP may involve watershed or regional partners collaborating to combine or coordinate existing programs for public stewardship of water resources. Permittees shall indicate if they are or will be working collaboratively with watershed or regional partners on any or all activities in the PEP during the permit cycle, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

The PEP is designed to implement a sufficient amount of educational activities to ensure that the targeted audiences are reached with the appropriate messages to the maximum extent practicable. The

permittee shall identify applicable topics from the topics listed below, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

Each applicable topic shall be prioritized based on a procedure for assessing high-priority community-wide issues and targeted issues to reduce pollutants in stormwater runoff, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

A. Promote public responsibility and stewardship in the applicant(s) 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 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 into 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. Educate the public on and promote the benefits of green infrastructure and Low Impact Development.

J. Promote methods for managing riparian lands to protect water quality.

K. Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.

For all applicable topics, the PEP shall identify:

1. Target audience.
2. Key message.
3. Delivery mechanism.
4. Year and frequency the BMP will be implemented.
5. Responsible party.

A **measurable goal with a measure of assessment shall be included for each BMP** and as appropriate, a schedule for implementation (months and years), including interim milestones and the frequency of the BMP, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

The PEP shall provide the procedure for evaluating and determining the effectiveness of the overall PEP. The procedure shall include a method for assessing changes in public awareness and behavior resulting from the implementation of the PEP and the process for modifying the PEP to address ineffective implementation, (Stormwater Discharge Permit Application, Public Education Program (PEP) p. 3).

II. COLLABORATION OF WATERSHED PARTNERS

The permittees identified below have elected to meet the PEP requirements by working with each other and other watershed and regional partners to develop, submit, and implement a PEP that includes both collaborative and individual BMPs:

- Ann Arbor Public Schools
- Barton Hills Village
- Brighton Township
- Charter Township of Ypsilanti
- City of Ann Arbor
- City of Brighton
- City of Dexter
- City of Ypsilanti
- Eastern Michigan University
- Livingston County Drain Commissioner
- Livingston County Road Commission
- Pittsfield Charter Township
- University of Michigan
- VA Ann Arbor Healthcare System
- Village of Pinckney
- Washtenaw County Road Commission
- Washtenaw County Water Resources Commissioner

III. PROCEDURE FOR IDENTIFYING AND PRIORITIZING APPLICABLE PEP TOPICS

The public education topics A-K listed above in Section II were identified in the permit application. These topics are referred to by their corresponding letter in the Public Education BMPs below as well as on the PEP table.

Watershed-Wide Priority Topics

The procedure for identifying high-priority watershed-wide or targeted issues suited for collaborative public education efforts includes:

- A review of Watershed Management Plans for both the Huron River in the Ann Arbor-Ypsilanti Metropolitan Area (Middle Huron) and the Huron Chain of Lakes including any established Total Maximum Daily Loads for waterbodies in each area.
- A review of data from the Water Quality Monitoring Program.
- A review of the effectiveness of PEP activities (both the accumulated measures of the PEP's individual activities and a measure of the sum of all the activities including results from a survey of residents administered in conjunction with the distribution of a Community Watershed Calendar, Activity #2 below and referenced in Section VIII. Evaluation of Effectiveness).
- Topics identified by permittees at quarterly group meetings and periodic subcommittee meetings prior to and throughout the permit cycle.
- Discussion and input from the permitted entities regarding individual jurisdictional versus watershed-wide needs, potential public outreach opportunities, and existing and future programs.

Any additional procedural steps for identifying high-priority or targeted issues by individual permittees include:

The high priority community-wide issues and targeted issues are:

- High levels of phosphorus in stormwater runoff from most monitored tributaries indicating broad sources;
- High *E. coli* counts in some targeted tributaries in the Middle Huron (Mill and Honey Creeks, and tributaries draining to the Huron River between Argo and Geddes Ponds);
- High conductivity levels (indicating potential dissolved contaminants) in most Middle Huron tributaries;
- Flashy flows in Middle Huron streams indicating the need for infiltration and storage across the watershed;
- A need for greater protection of riparian areas to reduce erosion and slow and treat stormwater runoff; and
- Survey results indicating a need for continued education about stormwater pollution and residential responsibilities.

The high priority community-wide issues and targeted issues were used to **prioritize** topics A-K for **collaborative efforts.** Existing and Proposed Collaborative Public Education BMPs include in some way all topics, but the emphasis will be on Collaborative High Priority Topics. Individual permittees may have additional or other priorities for individual education efforts as shown below and may address these in Existing and Proposed Individual Public Education BMPs:

Collaborative Priority Level	Permittee Priority	Topic Letter	Topic Description
High		A	Public responsibility and stewardship in the watershed.
High		B	The connection of the MS4 to area waterbodies and the potential impacts of discharges.
High		F	Proper disposal practices for grass clippings, leaf litter, and animal wastes.

High		E	Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.
High		I	Benefits of green infrastructure and Low Impact Development.
High		J	Methods for managing riparian lands to protect water quality.
Low		H	Proper septic system care and maintenance, and how to recognize system failure.
Low		C	Illicit discharges and public reporting of illicit discharges and improper disposal of materials.
Low		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.
Low		D	Promote preferred cleaning materials and procedures for car, pavement, and power washing.
Low		K	Identify and educate commercial, industrial and institutional entities likely to contribute pollutants to stormwater runoff.

IV. EXISTING AND PROPOSED COLLABORATIVE PUBLIC EDUCATION BMPs

To address each of the PEP requirements, the permittee will, individually or collaboratively, implement the following specific activities, which include a description, timeline, evaluation component, and the required topic that the activity meets. Activities will be completed with the involvement of responsible parties as noted in each activity description, and/or in cooperation with identified permitted communities.

Timelines for implementation of proposed activities extend from permit issuance (year 1) when implementation of the PEP begins for a period of five (5) years.

Activity #1: Distribute Informational Materials

Delivery Mechanism: Print and digital materials such as tip cards, brochures, posters, website links, or graphics for emails, websites or social media sites developed by the Huron River Watershed Council (HRWC), or created by the Southeast Michigan Council of Governments (SEMCOG), or others will be utilized. Campaign materials will be distributed at municipal offices, events, on web sites, via cable access or direct mailed as appropriate.

Key Messages: Materials contain information that covers required Topics A-K. For example, the SEMCOG campaign promotes key messages on proper use of fertilizer, car care,

	landscaping, storm drain awareness, household hazardous wastes, water conservation, pet care, green infrastructure, and riparian protection.
Target Audience:	Residents, visitors, public employees, businesses, industries, construction contractors and developers.
Year and Frequency:	Materials will be disseminated at least annually throughout the permit cycle.
Goal:	To increase visibility and awareness of watershed issues and the impacts of pollutants discharged to the MS4 among residents, visitors, public employees, businesses, industries, construction contractors, and developers through repeat messaging and information.
Assessment:	Frequency and number, circulation or amount distributed; tracking of web hits to supporting pages; and/or phone calls and e-mails to the permittee for related information.
Responsible Parties:	SEMCOG has materials available free with membership or for purchase, HRWC develops materials under contract for permittees working collaboratively. Permittees will individually ensure distribution of materials to appropriate target audiences through their current channels of distribution, see Section VI Existing and Proposed Individual BMPs.
Topics Addressed:	A-K
Permittee AAPS:	SEMCOG posters placed strategically throughout the district, SEMCOG "7 Simple Steps to Clean Water" information on stormwater webpages, watershed specific information on the stormwater webpage, and include HRWC links on the stormwater webpage.

Activity #2: Distribute a Community Watershed Calendar

Delivery Mechanism:	Coordinated by HRWC, permittees will participate in the bulk printing and distribution of a Community Watershed Calendar to residents. The calendar will, at least once during the permit cycle, include a mechanism for collecting evaluative feedback to measure the effectiveness of the piece itself or that will measure overall PEP effectiveness, see Section VIII Evaluation of Effectiveness.
Key Messages:	Calendars typically feature a different tip each month for increasing public awareness of watershed issues and improving personal actions affecting the health of their watershed. Topics/messages are likely to include key messages associated with A-J of the PEP topics that are suited for homeowners, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; green infrastructure and LID; and illegal dumping in storm drains.
Target Audience:	Residents.
Year/Frequency:	Biannually (even years 2016, 2018, 2020, etc.).
Goal:	Increase in number of recipients reporting willingness to engage in specific MS4 pollution prevention activities and increased awareness of topics.
Assessment:	Number of calendars distributed; web site hits; evaluative results of calendar's impact; and broad survey of overall PEP effectiveness.
Responsible Parties:	Permittees produce collaboratively but distribute individually.
Topics Addressed:	A-J

Permittee AAPS: Place calendars in the lobby of the Administration Building as we as in the Main Office at school buildings.

Activity #3: Content in Community Newsletters, Websites, Social Media

Delivery Mechanism: Permittees will annually publish articles, resources, events and stewardship opportunities in their own newsletters, on websites, through email and/or social media tools. Sources for information include SEMCOG, HRWC, Washtenaw County, and Livingston County, MDEQ and/or EPA, and others. Topics will include watersheds, stewardship activities and events, and individual actions the public can take to protect water resources/prevent the discharge of pollutants to the MS4.

Key Messages: Articles and information will focus on issues represented by all 11 topics.

Target Audience: Residents, visitors, public employees, businesses, industries, construction contractors and developers.

Year/Frequency: Published annually throughout the permit cycle.

Goal: To increase resident awareness of watershed issues and the impacts of pollutants discharged to the MS4 and willingness to engage in pollution prevention activities or watershed stewardship.

Assessment: Frequency and number of articles, circulation or amount distributed, tracking of web hits to supporting pages and/or phone calls and e-mails for related information.

Responsible Parties: The permittees will publish newsletter articles and information through various distribution outlets; Livingston and Washtenaw counties, HRWC and others will provide content and information, see Section VI Existing and Proposed Individual BMPs.

Topics Addressed: A-K

Permittee AAPS: SEMCOG "7 Simple Steps to Clean Water" information on stormwater webpages.

Activity #4: Local Newspaper and Web Advertisements

Delivery Mechanism: Coordinated by HRWC, participating permittees will pay for local print news media and online advertising.

Key Messages: Watershed awareness and protection, connection of storm drains to natural water bodies, hazardous waste disposal, illegal dumping, lawn care, and car washing. Advertisements will use materials developed by Southeast Michigan Partners for Clean Streams, SEMCOG, HRWC and others.

Target Audience: Residents, visitors, businesses, industries, construction contractors, developers.

Year/Frequency: Annually

Goal: To increase visibility of watershed and MS4 pollution issues through repeat messaging.

Assessment: Frequency and number of advertisements run; circulation/amount distributed; number of inquiry calls and web hits received as a result of advertisements.

Responsible Parties: HRWC to coordinate ad development, placement and timing and to track resulting inquiry calls and web hits. Permittees to provide funding.

Topics Addressed: A-J

Permittee AAPS: Include HRWC links on the stormwater webpage.

Activity #5: Promote Water Resource Protection Workshops

Delivery Mechanism: The permittees will assist in promotion of educational workshops and programs for target audiences that will be organized through agencies such as the Washtenaw County Water Resources Commissioner, the Livingston Drain Commissioner, County Road Commissions, MSU Extension, SEMCOG, the Michigan Water & Environment Association, the natural Shorelines Partnership and others.

Key Messages: Programs may include the following: Watershed Management Short Course, Master Rain Gardener and Master Composter program, Michigan Water Stewards program, watershed-friendly golf course management workshop, illicit discharge and connections elimination workshop, road salt BMP/de-icing alternatives workshop, land use/storm water planning workshops, and riparian land management workshops.

Target Audience: Residents, government officials and employees, construction contractors, and developers.

Year/Frequency: 1 per year throughout the permit cycle as workshop dates are established.

Goal: Number of workshop participants.

Assessment: Compilation of all promotional efforts; number of attendees from the communities of the permittees. When possible participants will be surveyed by organizer immediately following workshops.

Responsible Parties: Permittees will promote workshop events as developed by outside agencies.

Topics Addressed: K in particular, but also A-J

Permittee AAPS: SEMCOG links visible on the stormwater webpage.

Activity #6: Promote and Support Volunteer Stream Monitoring

Delivery Mechanism: Permittees will support and assist in promoting the Huron River Watershed Council's Adopt-A-Stream Program. Efforts will include providing Adopt-A-Stream literature and posting volunteer event opportunities at customer service locations, on web sites and social media outlets and in newsletters. HRWC will provide information ongoing to permittees on Adopt-A-Stream volunteer opportunities prior to events.

Key Messages: Adopt volunteers assess habitat, water quality, and aquatic life in the Huron River and its tributaries as part of an ongoing scientific study. The Program strives to educate watershed residents about their connection to the river and also the current conditions of the Huron River and its tributary streams. In addition, a central goal of the program is to inspire people to take actions that lead to better river protection at home and in their communities.

Target Audience: Residents.

Year/Frequency: Annually spring, fall and winter.

Goal: Increase in participation in volunteer stream monitoring events and resulting stewardship activities (as reported).

Assessment: Compilation of all promotional efforts; number of citizens participating in events; resulting stewardship actions taken by participants as reported through a paper evaluation at the end of each event.

Responsible Parties: Permittees, HRWC.
Topics Addressed: A in particular, but also B-J

Permittee AAPS: Link to the HRWC volunteer program on stormwater webpage.

Activity #7: Promote and Support Storm Drain Labeling *(for communities with storm drains)*

Delivery Mechanism: Permittees will support and assist in promoting the Huron River Watershed Council's Adopt-A-Stormdrain program. The program encourages both group and individual homeowner catch basin maintenance and labeling and distribution of information to residential neighbors. Permittee efforts will include designating stormdrains for adoption and recruiting public participation through distribution of promotional information and materials.
Additionally The Water Resources Commissioner's Office actively implements a catch basin marker program through the Community Partners for Clean Streams Program and the Homeowner's Handbook. Subdivision/ condominium developments, businesses and institutional landowners must have final approval of the WRC as a Community Partner for Clean Streams (where appropriate) to be eligible. The markers are installed by Homeowner Associations/residents/businesses. Permittees may also implement storm drain labeling with the use of school and community volunteers to assist in affixing labels to storm drains. Along streets where storm drains are affixed, communities will distribute flyers to residential units. Limited to locations with occupancy rates of over 80% (i.e. areas not under recent construction).
Key Messages: The connection of storm drains to local waterways and the impacts of dumping pollutants into these drains.
Target Audience: Residents, visitors, and commercial businesses and institutions.
Year/Frequency: Ongoing throughout permit cycle.
Goal: Increase in number of catch basins labeled and/or maintained by residents and number of residents who can identify the connection between MS4s and waterbodies.
Assessment: Participation level in HRWC Adopt-A-Stormdrain program, number of drains labeled and flyers distributed.
Responsible Parties: Washtenaw County Water Resources Commissioner, permittees in Washtenaw County, school and community volunteers, HRWC. (The Adopt-A-Stormdrain program is currently in Washtenaw County only).
Topics Addressed: A, B, C in particular

Permittee: Link to the HRWC Adopt-A-Stormdrain on stormwater webpage.

Activity #8: Promote Riparian Land Management Information

Delivery Mechanism: Coordinated by HRWC, the permittees will distribute a brochure promoting riparian best management practices to riparian landowners via local realtors and nursery/garden retail businesses. Brochures will also be available at municipal offices and distributed by government officials and employees who work with riparian landowners or direct mailed to landowners.
Key Messages: Brochures will emphasize BMPs such as landscaping with native plants, buffer zones, and minimizing impervious surfaces to facilitate on-site water retention.

Target Audience:	Riparian landowners, realtors, government officials and employees.
Year/Frequency:	Brochures available throughout the permit cycle.
Goal:	Increase number of riparian landowners who implement BMPs.
Assessment:	Number of brochures distributed, number of hits to supporting web page or phone calls received by HRWC for additional information. Increase in number of riparian landowners reporting willingness to implement BMPs.
Responsible Parties:	Permittees produce collaboratively and distribute individually, HRWC.
Topics Addressed:	J
Permittee:	Link to Waterfront Wisdom, 7 Tips for creating and maintain a beautiful and healthy waterfront.

Activity #9: Conduct Outreach at Local and Regional Fairs and Community Events

Delivery Mechanism:	Coordinated by HRWC and done individually, permittees will promote and support stormwater education displays and outreach at local fairs and community events such as community Earth Day Festivals, Green Fairs, Huron River Days and others. They will also help promote these events through their newsletters and on websites.
Key Messages:	Public awareness of watershed issues and improving personal actions affecting the health of the watershed also including key messages associated with A-J of the PEP topics, such as general watershed stewardship; household hazardous waste disposal; proper lawn care; car washing; storm drain pollutants; pet waste; riparian land management; benefits of native plants; and illegal dumping in storm drains.
Target Audience:	Residents, visitors, community leaders.
Year/Frequency:	3 per year.
Goal:	To increase resident awareness of watershed and MS4 pollution issues and willingness to engage in pollution prevention activities or watershed stewardship.
Assessment:	Number of events; number of materials distributed and contacts made, e-mail addresses collected for HRWC or permittee newsletter distribution.
Parties involved:	Permittees and HRWC. See Section VI Existing and Proposed Individual BMPs.
Topics Addressed:	A-J
Permittee:	Forward HRWC event notices to school staff.

Activity #10: Promote County-Wide Complaint Tracking and Response Systems

Delivery Mechanism:	Permittees will educate the public on illicit discharges and work with the counties to publicize county-wide public reporting and response system for illicit discharges or improper disposal of materials into local storm drain systems. Environmental Reporting Lines are in place in both Washtenaw and Livingston counties. Washtenaw County Environmental Health administers the Reporting Line for Washtenaw County and Livingston County Health Department administers it in Livingston County. The programs are logged and have an updated brochure ready for distribution. The Counties promote the use of their Environmental Reporting Lines through partner newsletters, cable TV, and web sites.

Key Messages:	Prevention and reporting of illicit discharges and/or improper disposal of materials into MS4s.
Target Audience:	Residents, visitors, commercial and industrial businesses, local government officials and employees.
Year/Frequency:	Ongoing promotional efforts.
Goal:	Decrease in the number of illicit discharges and improper disposal of materials into MS4s.
Assessment:	Promotion/publicizing efforts; Number of calls to Environmental Reporting Line; results of the tracking and response system.
Responsible Parties:	Washtenaw County Health Department, Water Resources Commissioner, Livingston County Health Department, Livingston County Drain Commissioner, Permittees.
Topics Addressed:	B, C
Permittee:	Place How to Report/Hotline Numbers poster at district facilities and post copy of AAPS SW Illicit Discharge Regulatory Policy on the district webpage.

V. EXISTING AND PROPOSED COUNTY-WIDE PUBLIC EDUCATION BMPs

Activity #11: Livingston County Household Hazardous Waste Reduction Program

Delivery Mechanism:	Permittees will work with the County to publicize. Provides the residents of Livingston County with a disposal option for flammable, poisonous, toxic and corrosive materials by providing quarterly county-wide collections at an established center in Howell, along with informational materials for the public that promote the collection center and proper disposal of household hazardous waste, and information related to recycling. LCDC's Solid Waste Program developed a "Waste Reduction Guide" to help residents and local businesses dispose of items ranging from batteries to printer cartridges to tires. The LCDC website also identifies services, informational publications, updates on locations and times for disposal and resource links. The LCDC Solid Waste Program gives detailed information on its website on paint disposal and oil recycling. LCDC also sponsors a Mercury Thermometer Exchange to educate residents on the dangers of mercury and reduce the amount being discarded in residential trash. LCDC will also provide information displays for area banks, post offices and public libraries that offer information on travel trailer, vehicle maintenance and other household hazardous waste disposal.
Key Messages:	The program seeks to address the environmental (including water quality) and public health effects resulting from improper handling and disposal of household hazardous waste, and is committed to reducing the use of home toxics and keeping citizens informed about the choices and responsibilities associated with purchasing, handling and disposing of toxic substances.
Target Audience:	Livingston County residents.
Year/Frequency:	On-going quarterly collections.
Goal:	Increase the number of residents using the program to dispose of home toxics.

Assessment: Promotion/publicizing efforts including display use; Number of drop offs/quantity of disposal materials; web site hits.
Party Involved: Coordinated by Livingston County Solid Waste Department and LCDC. Promoted by permittees in Livingston County.
Topics Addressed: G

Permittee: Not applicable for Ann Arbor Public Schools

Activity #12: Livingston County Prescription Drugs and Personal Care Products Disposal Program

Delivery mechanism: Permittees will work with the county to publicize. County website and brochure outlining proper disposal of unused prescription drugs and personal care products. Permanent collection sites and system established via the Big Red Barrel project.
Key Messages: Keep Rx Drugs and personal care products out of our water systems, proper medication disposal.
Target Audience: Livingston County residents.
Year/Frequency: Ongoing throughout permit cycle.
Goal: Increase the number of residents using the program to dispose of prescription drugs and personal care products.
Assessment: Promotion/publicizing efforts; web site hits; Quantity of pharmaceuticals collected at events.
Party Involved: Livingston County Solid Waste Department, Livingston County Sheriff's Office, Livingston Community Alliance. Promoted by permittees in Livingston County.
Topics Addressed: A, G

Permittee: Not applicable for Ann Arbor Public Schools

Activity #13: Livingston County Electronic Waste Reduction Program

Delivery Mechanism: County-wide annual event to properly dispose/recycle used electronics (TVs, computers, etc.). Promote proper disposal of used electronic devices to keep out of waste stream. Information distributed to public through brochures, website, and various public events.
Key Message: Keep electronic devices out of landfills by properly recycling.
Target Audience: Livingston County residents
Year/Frequency: Annually.
Goal: Increase the number of residents using the program to dispose of electronic waste.
Assessment: Promote/publicize efforts; web site hits; Quantity of devices collected at events.
Party Involved: Livingston County Solid Waste Department. Promoted by permittees in Livingston County.
Topics Addressed: A

Permittee: Not applicable for Ann Arbor Public Schools

Activity #14: Stream and River Crossing Road Signs Livingston and Washtenaw Counties

Description: The Washtenaw County Road Commission and the Livingston County Road Commission each will coordinate the design and placement of stream and road crossing signs on primary roads in their respective county in areas where a need for signage has been identified and not met. Existing signs will also be maintained.
Target Audience: Visitors, residents.
Year/Frequency: Ongoing.
Goal: Raise public awareness of area watersheds and creeksheds.
Assessment: Number of signs, maintenance activities; increase in number of people reporting seeing signs over permit cycle as indicated in the measure overall PEP effectiveness, see Section VII Evaluation of Effectiveness.
Parties involved: WCRC, LCRC and local community officials, permittees.
Topics Addressed: A

Permittee: Not applicable for Ann Arbor Public Schools

Activity #15: Washtenaw County Community Partners for Clean Streams

Delivery Mechanism: Community Partners for Clean Streams is a voluntary, no cost to participants, cooperative water quality protection program between the Washtenaw County Water Resources Commissioner's office and Washtenaw County businesses, institutions and multi-complex land owners. Partners assess how their daily site activities affect stormwater quality and commit to proactive ways to improve their activities by way of a Water Quality Action Plan. Partners are recognized for their stewardship in online and newspaper ads. Permittees will promote program in newsletters, make referrals to WCWRC regarding potential partners, and display brochures, supplied by WCWRC, promoting the program.
Key Messages: Commitment to protect water quality through on-site daily activities.
Target Audience: Washtenaw County businesses, institutions, multi-complex land owners.
Year/Frequency: On-going.
Goal: Increase in number of participants in program.
Assessment: Number of participants.
Parties Involved: WCWRC. Promoted by permittees in Washtenaw County.
Topics Addressed: A-J

Permittee: Link to Washtenaw County Community Partners for Clean Streams webpage.

Activity #16: Washtenaw County Pollution Prevention Inspections

Delivery Mechanism: The Pollution Prevention Program is responsible for inspecting facilities that store, manufacture, or use hazardous, toxic, or polluting materials.
Key Messages: Inspectors ensure that facilities utilize and dispose of hazardous materials properly, thereby preventing environmental contamination. This program operates in accordance with the Washtenaw County Pollution Prevention Regulation.
Target Audience: Facilities that store, manufacture or use hazardous, toxic, or polluting materials.
Year/Frequency: On-going. Washtenaw County staff routinely inspects businesses storing 56 gallons or more of hazardous materials. Frequency of inspection depends on the

	quantity of materials stored and the level of compliance achieved, and varies from once a year to once every four years. However, staff may make site visits as needed to ensure compliance with the P2 Regulation.
Goal:	Increase in improvements made as a result of inspection.
Assessment:	Number of inspections..
Parties involved:	Washtenaw County Environmental Health and Water Resources Commissioner.
Topics Addressed:	K
Permittee:	Link to Washtenaw County Pollution Prevention webpage.

Activity #17: Washtenaw County Issues of the Environment Radio Show

Delivery Mechanism:	Weekly radio shows; every Wednesday morning from 8:20-8:30am the Washtenaw County Division of Public Works hosts a special guest speaker on the Issues of the Environment Radio Show on WEMU (89.1 FM).
Key Messages:	Varies by show topic, but generally addresses environmental stewardship and related issues. Promotes public awareness of environmental issues, programs and news impacting our community.
Target Audience:	Washtenaw County residents and businesses.
Year/Frequency:	Ongoing weekly show, frequency of water quality related topics will be quarterly.
Goal:	Increase in number of listeners recognizing watershed and taking steps to protect and participating in programs.
Assessment:	Number of water quality related program topics covered.
Parties involved:	Washtenaw County Environmental Health Division. Promoted by permittees in Washtenaw County.
Topics Addressed:	A-K
Permittee:	Link to Washtenaw County radio show on the district webpage.

Activity #18: Washtenaw County Environmental Excellence Awards

Delivery Mechanism:	The Environmental Excellence Awards Program recognizes businesses and non-profit organizations in Washtenaw County that practice environmentally sound behavior in the areas of water quality protection, waste reduction and recycling, and pollution prevention. This award is provided once year.
Key Messages:	Water quality protection, waste reduction and recycling, and pollution prevention.
Target Audience:	Businesses, institutions, multi-complex developments.
Year/Frequency:	Annually.
Goal:	Increase in number of applicants/participants and award recipients.
Assessment:	Number of award recipients.
Parties involved:	Washtenaw County Water Resources Commissioner, Environmental Health Division, and Solid Waste Management. Promoted by permittees in Washtenaw County.
Topics Addressed:	A-K
Permittee:	Not applicable for Ann Arbor Public Schools.

Activity #19: Washtenaw County Fats, Oils, and Grease and Litter Reduction

Delivery Mechanism: Community Partners for Clean Streams – Handbook Section 9; Fats, Oil and Grease brochure; and FOG presentations. FOG material distribution and presentations are coordinated through the Washtenaw County Environmental Health Department and Water Resources Commissioner's Office.

Key Messages: Proper disposal of cooking fats, kitchen maintenance practices and recycling best management practices.

Target Audience: Washtenaw County businesses.

Year/Frequency: On-going. Materials are available at County offices, distributed by staff, online and at events/presentations. FOG presentations are provided upon request.

Goal: Decrease the number of actions or corrections needed.

Assessment: Number of participants and materials distributed.

Parties involved: Washtenaw County Water Resources Commissioner, Environmental Health Division.

Topics Addressed: K

Permittee: Link to Washtenaw County Fats, Oils, and Grease on the district webpage.

Activity #20: Washtenaw County River Safe Homes Program

Delivery Mechanism: Online and hard copy surveys determine how activities around the home protect water quality. Improvement resources are included. Participants receive a RiverSafe Homes plaque for satisfactorily completing the survey and periodic environmental news via email, website or social media posts.

Key Messages: Protecting water quality around the home is easy to do and produces significant results.

Target Audience: Washtenaw County residents. Business, industries.

Year/Frequency: On-going.

Goal: Increase number of participants.

Assessment: Number of participants; results of survey.

Parties Involved: Washtenaw County Water Resources Commissioner. Promoted by permittees in Washtenaw County.

Topics Addressed: A-K

Permittee: Link to Washtenaw County RiverSafe Homes on the district webpage and Link to Washtenaw County survey.

Activity #21: Washtenaw County/Ann Arbor Residential Rain Garden Program

Delivery Mechanism: The City of Ann Arbor and the Washtenaw County Water Resources Commissioner works with several families each year to plan, design and install rain gardens on their properties as funding is available. The WCWRC's website provides extensive information to promote and support "do-it-yourself" rain gardeners.

Key Messages: Protecting water quality and preventing stormwater runoff through the use of rain gardens with native plants.

Target Audience: Washtenaw County residents.

Year/Frequency: Annually.

Goal: Increase number of participants in program.

Assessment: Number of participants and number of rain gardens installed and maintained.
Parties Involved: Washtenaw County Water Resources Commissioner, City of Ann Arbor. Promoted by permittees in Washtenaw County.
Topics Addressed: A, B, I, J

Permittee: Link to Washtenaw County Rain Garden information on the district webpage.

Activity #22: Washtenaw County Home Toxics Reduction Program

Delivery Mechanism: Provides the residents of Washtenaw County with a disposal option for flammable, poisonous, toxic and corrosive materials by providing the Washtenaw County Home Toxics Collection Center in Scio Township, along with informational materials for the public that promote the collection center and proper disposal of home toxics.
Key Messages: The program seeks to address the environmental (including water quality) and public health effects resulting from improper handling and disposal of home toxics and is committed to reducing the use of home toxics and keeping citizens informed about the choices and responsibilities associated with purchasing, handling and disposing of toxic substances.
Target Audience: Washtenaw County residents.
Year/Frequency: On-going.
Goal: Increase the number of residents using the program to dispose of home toxics.
Assessment: Promoting/publicizing efforts; web site hits; informational materials distributed; Number of drop offs/quantity of disposal materials.
Party Involved: Washtenaw County and Permittees who promote the Home Toxic Reduction Program. Promoted by permittees in Washtenaw County.
Topics Addressed: G

Permittee: Link to Washtenaw Home Toxics information on the district webpage.

Activity #23: Washtenaw County Drug Take-Back Program

Delivery mechanism: County website, brochure, video, outlining proper disposal of unused prescription drugs and personal care (PDPC) products; network of local pharmacies participating in a drug-take-back program. County funded contractor to provide drug pick up from participating pharmacies, and proper disposal. Brochures are placed at various local pharmacies, doctors' offices, government buildings. (web site : http://www.ewashtenaw.org/government/departments/planning_environment/environmental_issues/medications_disposal/).
Key Messages: "Don't rush to flush," keep Rx Drugs and personal care products out of our water systems, proper medication disposal.
Target Audience: Washtenaw County residents.
Year/Frequency: On-going.
Goal: Increase the number of residents using the program for disposal of PDPC.
Assessment: Promotional efforts; Quantity of pharmaceuticals brought into participating pharmacies.
Party Involved: Washtenaw County Environmental Health and Water Resources Commissioner. Promoted by permittees in Washtenaw County.

Topics Addressed: A, G

Permittee: Link to Washtenaw County "Don't Flush the Drugs" information on the district webpage.

VI. EXISTING AND PROPOSED INDIVIDUAL PUBLIC EDUCATION BMPs

NONE

VII. OTHER INVOLVED ORGANIZATIONS

In implementing this Public Education Plan, the permittees will pursue cooperative partnerships plus information and resource sharing with several organizations, including but not limited to:

Organization	Program	Contact If Known
Huron-Clinton Metropark Authority and Michigan State Parks	Environmental Education and Interpretive Programs	Jennifer Jaworski, HCM and XXXX, MDNR
Huron River Watershed Council	Water Quality Monitoring Program, Facilitation of Collaborative Permittee Activities, Information and Education Campaign	Ric Lawson and Pam Labadie
Livingston County Drain Commissioner	Workshops, Illicit Discharge & Dumping Response System, Educational Literature	Mitch Dempsey
Livingston County Health Department	Waste Water Management Program, Water Quality Monitoring Program	Matt Bolang
Livingston County Road Commission	Watershed signs	Kim Hiller
Livingston Solid Waste Management	Household Hazardous Waste Collection Site, composting, waste disposal and recycling	Robert Spaulding
MSU Extension – Livingston County	Horticulture & Natural Resources, Watershed Management, Lawn Care and other programs	Irene Donne
MSU Extension -- Washtenaw County	Horticulture & Natural Resources, Watershed Management, Lawn Care and other programs	Bob Bricault
Michigan Department of Environmental Quality	Water Resources Division, Field Operations Section	Christe Alwin (Livingston County) Deb Snell (Washtenaw County)
Michigan Water Environment Association	Water Source Book	Allison Wood, Executive Director
Southeast Michigan Council of Governments	Workshops, educational events, and public education materials	Katherine Grantham

Washtenaw County Environmental Health Department	Water Quality Monitoring Program, Septic systems; Environmental Reporting Hotline	Dave Dean
Washtenaw County Road Commission	Watershed Signs	Steve Puuri
Washtenaw County Solid Waste Program	Household Hazardous Waste Collection, composting, waste disposal and recycling	Jonathon Pelukas
Washtenaw County Water Resources Commissioner	Community Partners for Clean Streams, Environmental Reporting Hotline, Educational Literature, River Safe Homes, Rain Garden Program	Evan Pratt

VIII. EVALUATION OF EFFECTIVENESS

Evaluation of the overall effectiveness of the PEP will consist of a combination of both the accumulated measures of the effectiveness of the PEP's individual activities and a measure of the effectiveness of the sum of all the activities through a coordinated survey conducted by the permitted entities.

Evaluation of accumulated measures of the effectiveness of the PEP's individual activities success can be categorized in terms of output (i.e., effort or activity) that measures sort-term goals and milestones. Examples of output measurements include tracking web site hits or the number of literature pieces distributed to a target audience. When practicable, measurements of outcome (i.e., results that indicate actual behavior change) will be incorporated into BMP evaluations. Such measures are expected to include public comment and feedback, level of participation in programs and activities, and tools that measure behavior change. When applicable, these measures will be reasonably coordinated with other communities and organizations.

Permittees will collaboratively administer a broader survey once during the permit cycle in conjunction with Activity #2, the watershed community calendar. The survey's target audience will be residents of the permitted entities. The survey will measure public awareness of stormwater pollution and possible solutions, environmental attitudes, capacity, constraints, behaviors and, when appropriate, effectiveness of specific public education activities. The survey will primarily be conducted over the web with respondents recruited by mail and e-mail, through advertising, direct in-person contact and/or social media. Results will serve to provide a basis for evaluating PEP activities going forward, and will provide an opportunity to benchmark social indicators for subsequent permit cycles. Questions will be designed to reasonably compare with previous survey efforts.

IX. PERIODIC PROGRESS REPORT

Permittees will provide documentation of PEP efforts, a summary of the evaluation of its effectiveness when appropriate, and any proposed revisions or amendments to the PEP program in the periodic stormwater reports to the MDEQ. Reporting on PEP efforts will reflect data gathered on a calendar year basis.

Total Maximum Daily Load (TMDL) Implementation Plan for the Huron River Watershed MS4s in Washtenaw County

Updated November 3, 2020

The Michigan Department of Environment, Great Lakes, and Energy (ELGE), under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit application, requires a plan or other documentation outlining how each Municipal Separate Stormwater Sewer System (MS4) will "make progress toward achieving the pollutant load reduction requirement" in each TMDL listed in each applicant's application notice. The purpose of this document is to provide the collective watershed plan for addressing relevant TMDLs in the Huron River Watershed in Washtenaw County by MS4s for the purpose of stormwater permit compliance through a complete permit cycle. This document addresses the permit application sections VII.86 through VII.88.

I. TMDL and MS4 Coverage

This TMDL plan is submitted on behalf of the following Phase I and II MS4s within the Huron River Watershed, for each of the below-listed TMDLs:

A. *Excessive nutrients (phosphorus) and algae in Ford Lake and Belleville Lake*

City of Ann Arbor
Ann Arbor Public Schools
Barton Hills Village
City of Dexter
Eastern Michigan University
Pittsfield Charter Township
City of Ypsilanti
Ypsilanti Charter Township
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission
University of Michigan

B. *Excessive bacteria (E. coli) in the Huron River and tributaries downstream of Argo Dam to Geddes Dam*

City of Ann Arbor
Ann Arbor Public Schools
Pittsfield Charter Township
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission
University of Michigan

C. *Excessive bacteria (E. coli) in Honey Creek*

City of Ann Arbor
Ann Arbor Public Schools
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission

D. *Aquatic biota impairment in Malletts Creek*

City of Ann Arbor
Ann Arbor Public Schools
Pittsfield Charter Township
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission
University of Michigan

E. *Aquatic biota impairment in Swift Run*

City of Ann Arbor
Ann Arbor Public Schools
Pittsfield Charter Township
Ypsilanti Charter Township
Washtenaw County Water Resources Commissioner
Washtenaw County Road Commission

II. Prioritizing and Implementation BMPs

The MS4s in the Middle Huron River Watershed have put forth substantial effort and resources to reduce the sources of impairments related to the TMDLs listed in the previous section. These partner organizations, along with non-MS4 entities have developed a number of general and specific plans to address watershed impairments. These plans direct the current and future project and program priorities. The suite of projects and programs already put in place contributed to significant impairment reduction, as evidenced by data collected through on-going monitoring (see Appendix A for details).

To comply with NPDES stormwater permit requirements, the above-listed MS4s submit that the suite of Best Management Practices (BMPs) contained in the attached table represents each MS4's project priorities that will be implemented during the permit cycle to collectively make progress toward achieving each of the TMDL pollutant load reduction targets. The attached table of BMPs identifies the targeted TMDL pollutants (i.e. phosphorus, sediments, or bacteria where relevant) and the priority of the BMP. In many cases, no additional prioritization is needed, as the activity is a general (G) stormwater treatment BMPs and will be applied across the MS4 and watershed, and not specific to a particular drainage or impairment. For those BMPs that are area or pollutant specific, data from the monitoring program will be used to help establish priorities for implementation. In these cases, BMPs are classified as high (H), medium (M) or low (L) priority for each TMDL. The high priority BMPs will first be implemented in creeksheds or drainage areas that are determined (through monitoring) to be greater sources of the TMDL pollutant or impairment. Conversely, medium and low priority BMPs will be implemented in these TMDL-pollutant source areas after high priority BMPs are implemented.

III. Monitoring Plan

A summary of past monitoring results and conclusions related to TMDLs in the watershed is included in Appendix A. The summaries provided are based primarily on data collected through HRWC's Chemistry and Flow Monitoring Program, which has been funded in part by MS4s. Currently the MS4s and other watershed partners plan to continue to support this program to seasonally monitor Middle Huron River tributaries for TMDL pollutants. However, for the

purposes of NPDES stormwater permit compliance, the MS4s commit to the following monitoring plan.

1. MS4s will support the collection of water quality samples from sites that are located at or near major tributary mouths. Figure 1 shows a map of long-term monitoring sites at the time of publication. A current map of monitoring sites is located at https://www.hrwc.org/chemistryandflow/.

2. Samples will be collected at least twice during the permit cycle, not including the data included from previous monitoring. Sampling years will be permit year 2 and year 5. At least one sampling event will take place at each of the nine sites. An effort will be made to sample water quality parameters during a representative (i.e. >0.25" and <1.5") wet weather event.

3. Samples will be collected following procedures identified in HRWC's Chemistry and Flow Monitoring Program QAPP (see Appendix B). Samples will be analyzed by the Ann Arbor Water Treatment Plant Laboratory or other certified lab for the following concentrations: Total Phosphorus (TP), Total Suspended Solids (TSS), and *E. coli.*

4. Stream flow estimates will be obtained from existing stations during the dates and times water quality samples are collected.

5. The pollutant concentrations and stream flow estimates will be used to update pollutant loading models and estimate pollutant load reductions. These results will be summarized in a brief report to be shared with the public via HRWC and/or MS4 websites at least once during the permit cycle, but currently is done annually.

6. Depending on the results from long-term monitoring sites, additional short-term investigative sites may be selected upstream. These sites will be sampled within an hour of sampling at the downstream site so that results can be compared and better define pollutant source locations.

7. Based on a review of year 2 and year 5 data and summary reports, BMP implementation will be reviewed and BMPs may be updated or revised to ensure progress toward achieving TMDL pollutant load reductions.

In addition to this stormwater sampling plan, HRWC currently collects macroinvertebrates three times a year at sites throughout the Huron River Watershed. A number of these sites (see Figure 2) are in Malletts Creek and Swift Run watersheds, which are impaired for low biota diversity. This monitoring is not required, and MS4s do not commit to continue such sampling, but HRWC plans to continue doing so on behalf of all MS4s.

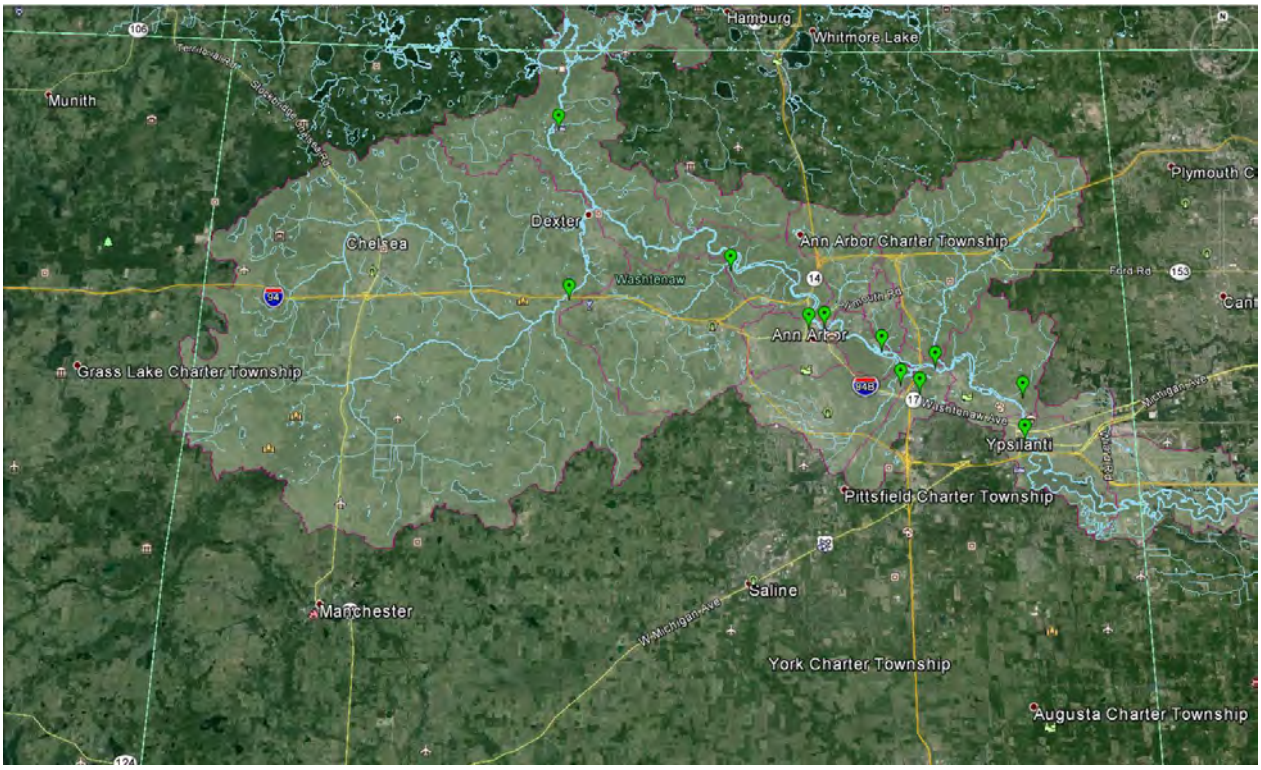


Figure 1. Long-term water quality monitoring stations in the Middle Huron River watershed.

Figure 2. Current HRWC macroinvertebrate sampling locations in Malletts Creek and Swift Run watersheds.

SWMP Priority Actions for Total Maximum Daily Load (TMDL) Progress

The table below lists stormwater BMPs that are targeted to improve water quality impairments listed by TMDL affected, and the SWMP section they apply to. If the BMP addresses a TMDL, high (H), medium (M) or low (L) priority is indicated, or G indicates general implementation.

Section*	SWMP Actions for (insert municipality name here)	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	E.coli TMDL
ERP	*Track instances of non-compliance as required under the permit*	G	G	G
PPP	*Access to the stormwater management plan*	G	G	G
PPP	*Stormwater Advisory Group (Watershed group), and*	G	G	G
PPP	*Stormwater Management Program (SWMP) review.*	G	G	G
PPP	*Participation in Watershed Groups*	G	G	G
PEP	*Distribute Informational Materials*	H	H	H
PEP	*Watershed Community Calendar*	G	G	G
PEP	*Information in Community Newsletters and on Websites - Educational Content*	G	G	G
PEP	*Local Newspaper and Web/Other Advertisements*	G	G	G
PEP	*Promote Water Resource Protection Workshops*	H	H	H
PEP	*Volunteer Stream Monitoring*	G	G	G
PEP	*Catchbasin/Storm Drain Labeling*	H	M	H
PEP	*Riparian Land Management Information*	H	H	H
PEP	*Displays and Outreach at Local and Regional Fairs and Community Events*	G	G	G
PEP	*Promote County-wide Compliant Tracking and Response System*	G	G	G
PEP	*Stream and River Crossing Road Signs*	G	G	G
PEP	*Washtenaw County Community Partners for Clean Streams*	G	G	G
PEP	*Washtenaw County Pollution Prevention Inspections*	H	L	H
PEP	*Washtenaw County Issues of the Environment Radio Show*	G	G	G
PEP	*Washtenaw County Environmental Excellence Awards*	G	G	G
PEP	*Washtenaw County Fats, Oil and Grease & Litter Reduction*	G	G	G
PEP	*Washtenaw County River Safe Homes Program*	G	G	G

SWMP Priority Actions for Total Maximum Daily Load (TMDL) Progress

Section*	SWMP Actions for (insert municipality name here)	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	E.coli TMDL
PEP	*Washtenaw County & City of Ann Arbor Residential Rain Garden Program*	H	H	M
PEP	*Washtenaw County Home Toxics Reduction Program*	G	G	G
PEP	*Washtenaw County Drug Take Back Program*	G	G	G
IDEP	*Dry Weather Screening Program & Data Collection*	M	L	H
IDEP	*Illegal Dumping/Spill Response & Database*	G	G	G
IDEP	*Environmental reporting line / Tracking*	G	G	G
IDEP	*Time of Sale & Field Inspections*	M		H
IDEP	*Pollution Prevention (P2) Program*	M	L	H
IDEP	*Staff Training*	M	L	H
IDEP	*Dye Testing*	M	L	H
SESC	*Soil Erosion and Sedimentation Control (SESC) Programs*	H	H	
SESC	*SESC Inspections*	H	H	
SESC	*Discharge notifications*	H	H	
SESC	*State of Michigan – Permit-by-Rule Notification*	H	H	
PCSW	*Require PCSW controls within jurisdiction, including on WC projects*	G	G	G
P2GH	*Municipal Facility & Structural Stormwater Control Inventory*	G	G	G
P2GH	*Regulated Municipal Facility – Assessment of Potential for Pollutant Discharge*	G	G	G
P2GH	*Catch basin cleaning*	H	H	M
P2GH	*Lot sweeping*	H	M	L
P2GH	*Litter collection*	G	G	G
P2GH	*Proper Handling & Disposal of Operation and Maintenance Waste*	H	M	L
P2GH	*Employee/Contractor Training*	G	G	G
P2GH	*Staff Certifications*	G	G	G
P2GH	*IDEP Training*	G	G	G
P2GH	*Management of County-owned Vegetated Properties*	H	M	

* Key:

ERP	Enforcement Response Procedure
PPP	Public Participation Plan
PEP	Public Education Plan
IDEP	Illicit Discharge and Elimination Plan

SWMP Priority Actions for Total Maximum Daily Load (TMDL) Progress

Section*	SWMP Actions for (insert municipality name here)	Phosphorus TMDL	Biota (Flow, sedimentation) TMDL	E.coli TMDL
SESC	Construction Soil Erosion and Sediment Control			
PCSW	Post-Construction Stormwater Runoff Program			
P2GH	Pollution Prevention and Good Housekeeping			

Appendix "D"

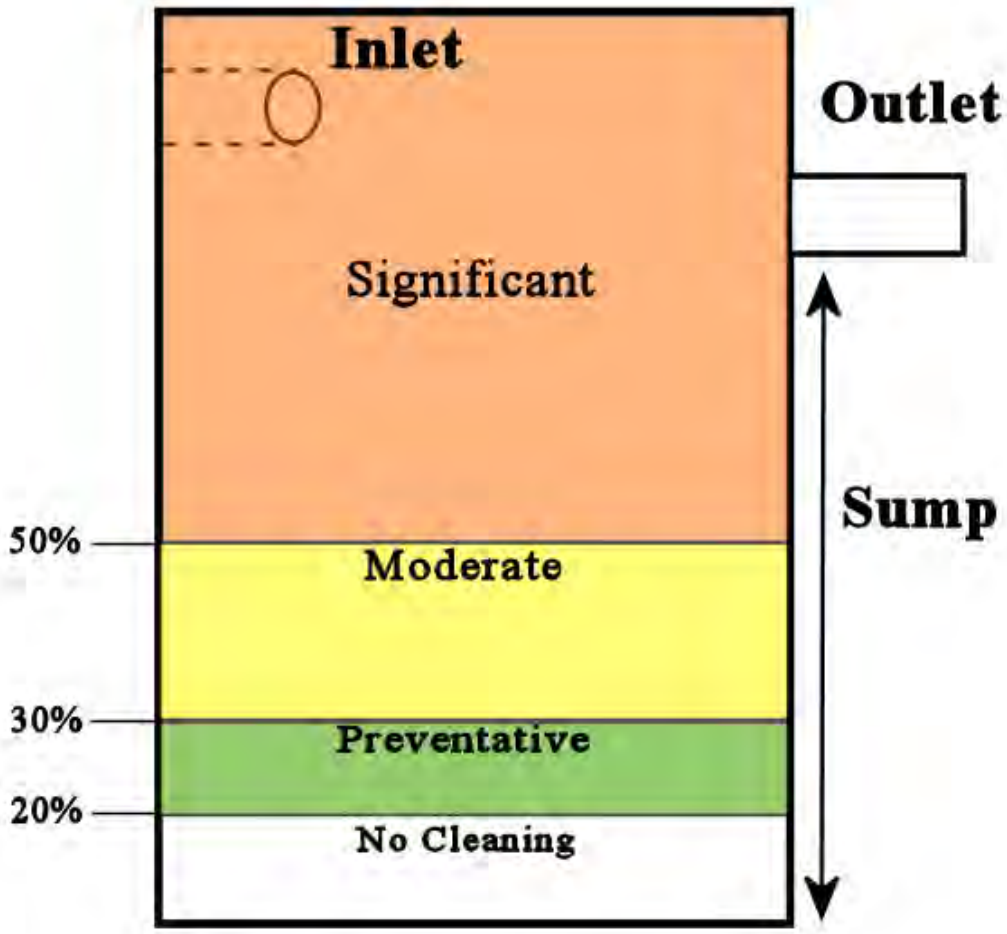
Inspection Field Worksheets

Routine Storm Sewer System Inspection Table

Building:	"School/Location"		**Client:**	"School District"
Inspectors:	"Inspectors Name"		**Start Date:**	"Start Date"	"End Date"
			Inspection Type:	"Routine Storm Sewer Inspection or other"

ID #	Type	Inspected	Standing Water	Color	Odor	Structure Staining	Suds	Oil Sheen	Bacterial Sheen	Sewage	Algae	Slimes	Abnormal Vegetation	Flow Observed	Velocity of Flow	Color of Flow	Blockages	Erosion	Needs Cleaning?	Structural Issues	Structural Trend	Stenciled
"Storm Structure ID" Ex. ADM-01.CB(ADM represents building such as Admin, 01=number of structure, and CB=structure type.	Type of Structure (Catch Basin, Manhole, Pond, Swale, Pipe, etc.)	Was it inspected this round. (Yes or No)	Was there standing water in the structure? (Yes or No)	What color is the standing water if present? (Clear, Cloudy, Brown, White, etc.)	Does the basin have a noticeable odor? (Yes or No)	Is there staining on the interior of the structure? (Yes or No) This could be staining caused by a current illicit discharge, remnants of a past illicit discharge, or natural staining from iron oxidizing bacteria etc.	Are there suds present in the structure (organic suds - caused by aeration/natural causes, soapy suds, or no)	Is there oil sheen present on the water surface in the structure? (Significant - indicative of an illicit discharge, OR No)	Is there bacterial sheen on water surface of the structure? (Yes or No) - We ask this to confirm that a sheen in a photo was bacterial instead of oil.	Is evidence of sewage present in water in structure? (toilet paper, poo, etc.) - (Yes or No)	Is Algae growth present in the structure? (Yes or No)	Are there slimes present in the structure? (Yes or No)	Is there abnormal veg. growth in structure? (Yes or No)	Was there water flow observed in the structures pipes? (No, Trickle(light flow), Intermittent(Indicative of a sump), or continuous(usually occurs during/after a rain event))	What is the estimated velocity of the water flow if present? (N/A, Trickle, slow, moderate, or substantial) Substantial occurs during or after a rain event.	What is the color of the flow within the structure? (N/A, Brown, Yellow, Clear, Cloudy, etc.) Used to be sure there is no evidence of illicit activities during or after rain events.	Are any pipes blocked? (Yes or No) This would be evident if there was a visible blockage in a pipe OR if the water level in the structure is high.	Is there erosion occurring around the structure? (Yes or No)	Does the structure have sediment build-up in the sump or bottom? (Significant - for 50% full sump depth below outpipe or higher, moderate - for 30% to 50% sump depth below outpipe, preventative - for 20% to 30% sump depth, OR no cleaning for below 20%. Or Cleaned)	Are there any issues with the structure itself and how severe is it? - This could be for cracking on the interior/exterior, sink holes, erosion, etc. (Significant, Moderate, Preventative, or None, Repaired-since last inspection, or Partial Repair)	If there is a structural issue, is the structural issue worsening since the previous inspection? (Stable - appears the same/hasn't worsened, Improving - appears better/usually for a repair or for erosion lessening, OR deteriorating - the condition has worsened)	Does the structure have a "No Dumping - Drains to River" stencil in place? (No - means it needs one, Yes - it has one, Update - it has one, but it is fading, OR N/A - the structure is in the grass)

environmental group


Inlet
Outlet
Significant
Sump
50%
Moderate
30%
Preventative
20%
No Cleaning

Routine Storm Sewer System Inspection Table

Building:			**Client:**	
Inspectors:			**Start Date:**	
			Inspection Type:	

ID #	Type	Inspected	Standing Water	Color	Odor	Structure Staining	Suds	Oil Sheen	Bacterial Sheen	Sewage	Algae	Slimes	Abnormal Vegetation	Flow Observed	Velocity of Flow	Color of Flow	Blockages	Erosion	Needs Cleaning?	Structural Issues	Structural Trend	Stenciled

environmental group

Detention BMP Inspection Checklist*

Project Location:_____

Date/Time: _____

Inspector:_____

Maintenance Item	Satisfactory/ Unsatisfactory	Recommended Inspection Frequency	Comments
Inlet/Outlet Pipes			
Structural integrity of inlet/outlet (Are any inlet pipes broken, crumbling, separated?) List Inlet Pipes Approximate Diameter and Type of Material Inlet Pipe 1 _____ Inlet Pipe 2 _____ Inlet Pipe 3 _____ Outlet Pipe Size/Type _____		A	
Riprap at inlet pipe (Is the riprap still present? Is it visible and not covered with sediment?		A	
Stone around outlet pipe (Is the stone clogged with debris and/or sediment?)		A	
Trash or debris blocking inlet/outlet (Inspect to ensure no major obstructions hindering general functionality)		M	
Inspect/clean catch basin upstream of the BMP if accessible.		A	
Inspect inlets and outlet for erosion (Are there eroded areas around the pipes?)		A	
Inspect overflow spillway for signs of erosion.		A	
Pretreatment (if applicable) (Might include sediment forebay, upstream catch basin, bioswale, rain garden, swirl concentrator)			
Device functioning to trap/collect sediment		A	
Remove accumulated sediment as appropriate for the pretreatment device. forebay		A	
Detention Pond		A	

Inspection frequency key — A = Annual, M = Monthly, S = After major storm
*It is recommended to review and inspect the basin with the engineering as-built plans.

Maintenance Item	Satisfactory/ Unsatisfactory	Recommended Inspection Frequency	Comments
Inspect side slopes, berms and emergency overflow for erosion		A	
Reestablish permanent native vegetation on eroded slopes		As needed	
Inspect for excess sediment accumulation in pond if not pretreatment device is present		A	
Overall functionality			
Ensure pond is functioning properly (Professional Civil Engineer is recommended)		A	
Ensure the outlet is functioning properly (Professional Civil Engineer is recommended)		A	
Optional/Enhancements			
Maintain 15-20 feet “no mow and chemical free” zone		A	
Mow (or burn) the “no mow” zone		A	
Inspect basin and “no mow” zone for invasive species.		A	
Qualified professional applicator selectively herbicide invasive species		A	
Increase plant diversity by planting additional vegetation in and around pond.		A	
Complaints from residents (note on back)		S	
Encroachment on pond/no- mow zone.		A	
Unauthorized plantings		A	
Aesthetics (e.g., graffiti, unkept maintenance)		A	

Inspection frequency key — A = Annual, M = Monthly, S = After major storm
*It is recommended to review and inspect the basin with the engineering as-built plans.

Summary

Inspector’s remarks: _____

_____

Overall condition of facility (acceptable or unacceptable): Acceptable

Dates any maintenance must be completed by: _____

Inspection frequency key — A = Annual, M = Monthly, S = After major storm
*It is recommended to review and inspect the basin with the engineering as-built plans.

Screening Inspection Log

Building:		**Client:**	
Inspectors:		**Date**	
		Inspection Type:	

Structure Information:

ID Number:		Structure Type		Lat:		Long:	
Type:		Location:					
Outfall Dimensions							

Observations:

Standing Water Characteristics

Standing Water:	
Color:	
Odor:	
Suds:	
Staining:	
Oil Sheen:	
Sewage:	
Bacterial Sheen:	
Floatables:	
Slimes:	
Abnormal Growth:	

Flow Characteristics

Flow Observed:	
Source of Flow:	
Velocity of Flow:	
Color of Flow:	
Flow Odor	

Maintenance

Cleaning:	
Blockages	
Structural Issues	
Structural Trend	
Stenciling:	

Additional Comments:

Sample ID And Information	
Sample Collected?	
Round:	
Last Rain Event:	
Current Weather:	
Sample Location Type:	
Other Screening Activities Conducted:	
Outfall Characterization:	
Sample sent to Lab:	

Field Analysis:	**Results:**	**Units:**	**Initials:**
pH:		pH units	
Temperature:		Celsius	
Surfactants:		mg/L	
Ammonia:		mg/L	
Chlorine:		mg/L	
Turbidity:		NTU	
Conductivity:		uohm/cm	

Equipment Calibration:

Date: 1/1/2013 Cal. By:

Photo ID:

Arch Environmental Group
37720 Interchange Drive,
Farmington Hills MI 48370

Phone: (248) 426-0135
Fax: (248) 426-0136
www.archenvgroup.com

DMB-SESC_Eform

SOIL EROSION AND SEDIMENTATION CONTROL (SESC) INSPECTION REPORT

DEPARTMENT OF MANAGEMENT AND BUDGET
INFRASTRUCTURE SERVICES, DESIGN AND CONSTRUCTION DIVISION
Second Floor, Stevens T. Mason Building
P.O. Box 30026, Lansing, Michigan 48909
This report is required to document soil erosion and sedimentation control on State of Michigan projects. (Authority: Part 91, PA 451)

REPORT NUMBER	SESC PERMIT NUMBER	REPORT DATE		PERIOD (FROM WHEN - TO WHEN)
INDEX NUMBER(S)	AGENCY NUMBER	FILE NUMBER	CONTRACT NUMBER	DEPARTMENT/UNIVERSITY/COLLEGE
PROJECT NAME				
CONTRACTOR				
PROFESSIONAL				

A. REASON FOR INSPECTION: ☐ Regular Inspection ☐ Post-Rain Event Inspection (explain below)

☐ Weekly ☐ Daily

B. CURRENT WEATHER CONDITIONS:

☐ Sunny ☐ Cloudy ☐ Partly Cloudy ☐ Windy Temperature_____

Precipitation: ☐ Rain ☐ Snow ☐ Sleet ☐ Hail Other (explain) _____

C. DESCRIBE SEVERE WEATHER (if applicable):

D. DESCRIBE WEATHER CONDITIONS SINCE LAST INSPECTION (Date of Last Inspection _____):

E. ARE THE CONTROLS INSTALLED ACCORDING TO THE PLANS AND SPECIFICATIONS? ☐ Yes ☐ No (Describe):

F. ARE THE CONTROLS IN PLACE FUNCTIONING PROPERLY? ☐ Yes ☐ No (Describe):

G. ARE THE CONTROLS BEING PROPERLY MAINTAINED? ☐ Yes ☐ No (Describe):

H. INDICATE THE SESC CONTROLS IN PLACE ON SITE (According to the DMB SESC Keying System):

Best Management Practice	Present (check)	Number or Lin Ft of Controls	Best Management Practice	Present (check)	Number or Lin Ft of Controls
Erosion Controls:			**Erosion/Sediment Controls:**		
(E1) Selective Grading & Shaping	☐		(ES31) Check Dam	☐	
(E2) Grubbing Omitted	☐		(ES32) Stone Filter Berm	☐	
(E3) Slope Roughening & Scarification	☐		(ES33) Filter Rolls	☐	
(E4) Terraces	☐		(ES34) Sand Fence	☐	
(E5) Dust Control	☐		(ES35) Dewatering	☐	
(E6) Mulch	☐		(ES36) Diversion Dike/Berm	☐	
(E7) Temporary Seeding	☐		(ES37) Diversion Ditch	☐	
(E8) Permanent Seeding	☐		(ES38) Cofferdam/Sheet Pilings	☐	
(E9) Mulch Blankets	☐		(ES39) Streambank Biostabilization	☐	
(E10) Sodding	☐		(ES40) Polymers	☐	
(E11) Vegetated Channels	☐		(ES41) Wattles	☐	
(E12) Rip Rap	☐		**Sediment Controls:**		
(E13) Gabion Walls	☐		(S51) Silt Fence	☐	
(E14) Energy Dissipator	☐		(S52) Catch Basin Sediment Guard	☐	
(E15) Temporary Slope Drain	☐		(S53) Stabilized Construction Access	☐	
(E16) Slope Drain	☐		(S54) Tire Wash	☐	
(E17) Cellular Confinement Systems	☐		(S55) Sediment Basin	☐	
(E18) Plastic Sheets	☐		(S56) Sediment Trap	☐	
(E19) Temporary Drainageway/ Stream Crossing	☐		(S57) Vegetated Buffer/Filter Strip	☐	
(E20) Temporary Bypass Channel	☐		(S58) Inlet Protection Fabric Drop	☐	
(E21) Live Staking	☐		(S59) Inlet Protection Fabric Fence	☐	
OTHER	☐		(S60) Inlet Protection Stone	☐	

I. WHAT CORRECTIVE ACTIONS SHOULD BE TAKEN BY THE CONTRACTOR?

J. BY WHAT DATE MUST THESE ACTIONS BE IMPLEMENTED: _____

K. OBSERVATIONS / COMMENTS:

_____ _____

Signature of Inspector Date

cc:

Appendix "E"

Property Structural Controls Inventory, Inspection, & Maintenance Schedule

November 1, 2020
Revised: May 23, 2021

Ann Arbor Public Schools – Abbot Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Abbot Elementary School 2670 Sequoia Pkwy, Ann Arbor, Michigan 48103	Low	Catch Basin/Manholes	13	Inspect Annually, Clean Once per Permit Cycle
		Open Pipe Outlet	1	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed

Revision Date: May 26, 2020

Ann Arbor Public Schools – Administration & Transportation
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Administration & Transportation 2555 S. State St., Ann Arbor, Michigan 48104	High	Catch Basin/Manholes	8	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	15	Inspect Annually, Maintain as Needed
		Drainage Receptor	10	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Retention Basin	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	7	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Landscape Drains	2	Inspect Annually, Maintain as Needed
		Oil Water Separator	1	Inspect Annually, Maintain as Needed

Revision Date: June 26, 2020

Ann Arbor Public Schools – Administration & Transportation
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
		Bus Wash	1	Inspect as part of the SWPPP 6 Month comprehensive Inspection
		UST	2	Inspect as part of the UST program.

Revision Date: June 26, 2020

Ann Arbor Public Schools – Allen Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Allen Elementary School 2560 Towner Blvd, Ann Arbor, Michigan 48104	Low	Catch Basin/Manholes	18	Inspect Annually, Clean Once per Permit Cycle
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Basin Drain	1	Inspect Annually, Maintain as Needed

Revision Date: May 26, 2020

Ann Arbor Public Schools – Angell Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Angell Elementary School 1608 S. University, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	8	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.20

Ann Arbor Public Schools – Bach Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Bach Elementary School 600 West Jefferson Street, Ann Arbor, Michigan 48103	Low	Catch Basin/Manholes	2	Inspect Annually, Clean Once per Permit Cycle
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Rain Garden	1	Inspect Annually, Maintain as Needed

Revision Date: May 26, 2020

Ann Arbor Public Schools – Bryant Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Bryant Elementary School 2150 Santa Rosa Drive, Ann Arbor, Michigan 48108	Low	Catch Basin/Manholes	9	Inspect Annually, Clean Once per Permit Cycle

Revision Date: October 27, 2020

Ann Arbor Public Schools – Burns Park Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Burns Park Elementary School 1414 Wells, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	5	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Carpenter Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Carpenter Elementary School 4250 Central Boulevard, Ann Arbor MI 48108	Low	Catch Basin/Manholes	11	Inspect Annually, Clean Once per Permit Cycle
		Basin Drain	2	Inspect Annually, Maintain as Needed
		Hydrodynamic Separator	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed

Revision Date: October 1, 2020

Ann Arbor Public Schools – Clague Middle School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Clague Middle School 2616 Nixon Rd, Ann Arbor, MI 48105	Low	Catch Basin/Manholes	18	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools – Community High School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Community High School 401 Division N, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	5	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Dicken Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Dicken Elementary School 2135 Runnymede, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	7	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – <SCHOOL>

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Eberwhite Elementary School 800 Soule Blvd, Ann Arbor, MI 48103	Low	Catch Basin/Manholes	4	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools

Forsyth Middle School-Wines Elementary School COMPLEX

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Forsythe Middle School 1655 Newport Rd, Ann Arbor, MI 48103 **Wines Elementary School** 1701 Newport, Ann Arbor, MI 48103 **COMPLEX**	Low	Catch Basin/Manholes	19	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – <SCHOOL>

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Freeman School 3540 Dixboro Lane, Ann Arbor MI 48105	Low	Catch Basin/Manholes	3	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools – Haisley Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Haisley Elementary School 825 Duncan, Ann Arbor, MI 48103	Low	Catch Basin/Manholes	4	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools – Huron High School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Huron High School 2727 Fuller Road, Ann Arbor, Michigan 48105	Medium	Catch Basin/Manholes	80	Inspect Annually, Clean Once per Permit Cycle
		Infiltration Basin	15	Inspect Annually, Maintain as Needed
		Hydrodynamic Separator	1	Inspect Annually, Maintain as Needed
		Open Pipe Outlet	5	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Trench Drain	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Streambank	1	Inspect Annually, Maintain as Needed

Revision Date: June 26, 2020

Ann Arbor Public Schools – King Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
King Elementary School 3800 Waldenwood Dr., Ann Arbor, MI 48105	Low	Catch Basin/Manholes	7	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Lakewood Elementary Schools
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Lakewood Elementary Schools 344 Gralake, Ann Arbor, MI 48103	Low	Catch Basin/Manholes	<Number>	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Lawton Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Lawton Elementary School 2250 S Seventh St, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	12	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Logan Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Logan Elementary School 2685 Traver Blvd, Ann Arbor, MI 48105	Low	Catch Basin/Manholes	19	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Parcel #09-12-10-304-099

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Parcel #09-12-10-304-099 2081 East Ellsworth Road, Ann Abor, MI, 48103	Low	NONE	NONE	N/A

Revision Date: 01.12.21

Ann Arbor Public Schools – Pathways to Success Academic Center
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pathways to Success Academic Center 2800 Stone School Road, Ann Arbor, Michigan 48104	Low	Catch Basin/Manholes	4	Inspect Annually, Clean Once per Permit Cycle
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Open Pipe Outlet	3	Inspect Annually, Maintain as Needed

Revision Date: July 7, 2020

Ann Arbor Public Schools – Pattengill Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pattengill Elementary School 2100 Crestwood Drive, Ann Arbor, Michigan 48104	Low	Manholes	8	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed

Revision Date: November 13, 2020

Ann Arbor Public Schools – Pioneer High School

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pioneer High School 601 Stadium Blvd W., Ann Arbor, MI 48104	Low	Catch Basin/Manholes	92	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Pioneer High School Maintenance Area
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pioneer High School Maintenance Area 601 Stadium Blvd W., Ann Arbor, MI 48104		Oil Water Separator	2	Inspect Annually, Maintain as Needed
		AST	1	Inspect as part of the SWPPP 6 Month comprehensive Inspection
		Salt Storage	1 Barn	Inspect as part of the SWPPP 6 Month comprehensive Inspection
		Aggregate Storage	1	Inspect as part of the SWPPP 6 Month comprehensive Inspection

Ann Arbor Public Schools – Pittsfield Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Pittsfield Elementary School 2543 Pittsfield, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	6	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools

Scarlett Middle School-Mitchell Elementary School COMPLEX

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Scarlett Middle School 3300 Lorraine Ave, Ann Arbor, MI 48108 **Mitchell Elementary School** 3550 Pittsview Dr., Ann Arbor, MI 48104 **COMPLEX**	Low	Catch Basin/Manholes	21	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Skyline High School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Skyline High School 2552 N Maple Rd, Ann Arbor, MI 48103	Low	Catch Basin/Manholes	35	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Detention Pond	3	Inspect Annually, Maintain as Needed
		Stabilized Outlet	1	Inspect Annually, Maintain as Needed

Revision Date: 01.12.21

Ann Arbor Public Schools – Slauson Middle School

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Slauson Middle School 1019 Washington W, Ann Arbor, MI 48103	Low	Catch Basin/Manholes	15	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools – Tappan Middle School

Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Tappan Middle School 2251 Stadium Blvd, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	12	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Ann Arbor Public Schools – Thurston Elementary School
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Thurston Middle School 2300 Prairie, Ann Arbor, MI 48105	Low	Catch Basin/Manholes	10	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Ann Arbor Public Schools – Westerman Early Childhood Center
Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Westerman Early Childhood 2775 Boardwalk, Ann Arbor, MI 48104	Low	Catch Basin/Manholes	1	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.

Revision Date: 01.12.21

Appendix "F"

Contractor Oversight & Employee Training Documentation

November 1, 2020
Revised: May 23, 2021

IDEP/PPGH STORMWATER TRAINING RECORD

Client	Location	Date
Ann Arbor Public Schools (Permit MI0060234)		

Illicit Discharge Elimination Program (IDEP): Training on techniques for identifying illicit discharges and connections, Training on procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.
Pollution Prevention & Good Housekeeping: Training on BMPs that are important such as good housekeeping, spill response, materials storage and handling, landscape maintenance, street maintenance, fleet maintenance, and garages.

Employee Name	Employee Signature	Job Title/Department

Instructor Name	Instructor Signature

Arch Environmental Group, Inc.
248-426-0165

Ann Arbor Public Schools
STORMWATER CONTRACTOR OVERSIGHT RECORD

Ann Arbor Public Schools (AAPS) shall implement the procedure requiring contractors hired by the AAPS to perform municipal operation and maintenance activities that comply with the AAPS pollution prevention and good housekeeping program and contractor oversight to ensure compliance with the AAPS National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Storm Water Discharge Permit, Section A. Limitations and Monitoring Requirements, #7 Contractor Requirements and Oversight.

1. Identify the potential pollutant-generating activities and pollutants expected to be exposed to stormwater.
2. Describe the location where the potential pollutant-generating activities will occur.
3. Identify the person responsible for implementing the pollution prevention practice or practices for each pollutant-generating activity.

Please initial each line of the procedure.

_____ Prevent and respond to leaks, spills and other releases;

_____ Prevent the discharge of spilled and leaked fuels and chemicals from vehicle fueling and maintenance activities;

_____ Prevent the discharge of soaps, solvents, detergents, and wash water from construction materials, including the clean-up of stucco,
paint, form release oils, and curing compounds. Collection and proper disposal in a manner to prevent contact with stormwater and prevent discharge of these pollutants.

_____ Minimize the discharge of pollutants from vehicle and equipment washing, wheel wash water and other types of washing (e.g., locating activities away from surface waters and stormwater inlets or conveyance and directing wash waters to sediment basins or traps, using filtration devices such as filter bags or sand filters or using similarly effective controls);

_____ Direct concrete wash water into a leak-proof container or leak-proof settling basin. The container or basin shall be designed so that no overflows can occur due to inadequate sizing or precipitation. Hardened concrete wastes shall be removed and disposed of in a manner consistent with the handling of other construction wastes. Liquid concrete wastes shall be removed and disposed of in a manner consistent with the handling of other construction wash waters and shall not be discharged to surface waters;

_____ Minimize the discharge of pollutants from storage, handling, and disposal of construction products, materials and wastes including (i) building products such as asphalt sealants, copper flashing, roofing materials, adhesives, concrete admixtures; (ii) pesticides, herbicides, insecticides, fertilizers, and landscape materials; and (iii) construction and domestic wastes such as packaging materials, scrap construction materials, masonry products, timber, pipe and electrical cuttings, plastics, Styrofoam, concrete, and other trash or building materials;

_____ Prevent the discharge of fuels, oils, and other petroleum products, hazardous or toxic wastes, and sanitary wastes.

_____ Report any other discharge from the potential pollutant-generating activities not addressed above to Ann Arbor Public Schools.

_____
Name of Business

_____ _____
Business Representative Date