

Attachment 7
To MDEQ Stormwater Discharge Permit Application

(Facility Table 3)
(Pollution Prevention Procedure)

Pollution Prevention Procedure

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Pollution Prevention and Good Housekeeping Program:

61. Provide the procedure for updating and revising the inventory in Question 59 and map (or maps) identified in Question 60 as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. A suggested timeframe for updating/revising the inventory and map(s) is 30 days following adding/removing a facility or structural stormwater control.

All changes to the stormwater control system will be kept on file and at the beginning of each calendar year the City's maps & inventory list will be updated.

62. Provide the procedure for assessing each facility identified in Question 59 for the potential to discharge pollutants to surface waters of the state. The procedure shall include a process for updating and revising the assessment. *A recommended timeframe for updating/revising the assessment is 30 days prior to discharging stormwater from a new facility and within 30 days of determining a need to update/revise the facility assessment.*

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

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

The facilities have been assessed based on the criteria listed in the application.

The time frame for updating/revising the assessment is 30 days prior to discharging stormwater from a new facility and within 30 days of determining a need to update/revise the facility assessment.

3.

69. Provide the procedure identifying the BMPs currently implemented or to be implemented during the permit cycle to prevent or reduce pollutant runoff at each facility with the medium and lower potential for the discharge of pollutants to surface waters of the state using the assessment and prioritized list in Questions 62 and 63.

The facilities with a medium to low potential for discharge have very few catch basins. Our BMP's for these sites is street sweeping.

70. Provide the procedure for prioritizing each catch basin for routine inspection, maintenance, and cleaning based on preventing or reducing pollutant runoff. The procedure shall include assigning a priority level for each catch basin and the associated inspection, maintenance and cleaning schedule based on preventing or reducing pollutant runoff. The procedure shall include a process for updating/revising the priority level for a catch basin giving consideration to inspection findings and citizen complaints. *A recommended timeframe for updating/revising the procedure is 30 days following the construction of a catch basin or a change in priority level.*

Each spring a list of catch basins in need of maintenance or repair is compiled from customer complaints or employee awareness. They are prioritized by the supervisor based on the condition of the structure and the potential for pollutant runoff.

The timeframe for updating/revising the procedure is 30 days following the construction of a catch basin or a change in priority level.

71. Provide the geographic location of the catch basins in each priority level using either a narrative description or map.

725 E. Main St. – 3

723 E. Main St. – 3

601 Chamberlain St. – 1

750 Coutant St. – 2

123 S. Cherry St. – 1

125 S. Maple St. – 4

118 N. Maple St. – 3

120 N. Maple St. – 1

300 S. Cherry St. – 3

220 S. McKinley Rd. – 2

226 S. McKinley Rd. – 2

1525 Coutant St. - 2

4.

72. Provide the procedure for inspecting, cleaning, and maintaining catch basins to ensure proper performance. Proper cleaning methods include ensuring accumulated pollutants are not discharged during cleaning and are removed prior to discharging to surface waters of the state.

A compliance assistance document titled Catch Basin Cleaning Activities Guidance Document is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf.

Conduct a visual inspection to ensure water in sump has not been contaminated.

Basin is vacuumed out and debris is dumped in drying bed.

Remove clear water – discharge into our sanitary system.

Remove solids – place in container for waste contractor to remove.

Make sure lines are clear of debris and structure is sound.

73. Provide the procedure for dewatering and disposal of materials extracted from catch basins.

A compliance assistance document titled Catch Basin Cleaning Activities Guidance Document is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf.

Basin is vacuumed out and dumped at drying bed.

Water is discharged into our sanitary system.

Solids are placed into a container provided by our waste contractor and removed by the same contractor.

74. Provide the procedure for inspecting and maintaining the structural stormwater controls identified in Question 59, excluding the structural stormwater controls included in an SOP as part of Question 64 and catch basins.. The procedure shall include a description and schedule for inspecting and maintaining each structural stormwater control and the process for disposing of maintenance waste materials. **The procedure shall require that controls be maintained to reduce to the maximum extent practicable the contribution of pollutants to stormwater.** The

procedure shall include a process for updating/revising the procedure to ensure a maintenance and inspection program for each structural stormwater control. *A recommended timeframe for updating/revising the procedure is 30 days following the implementation of a new structural stormwater control.*

The City owns only one detention basin which has not required any maintenance thus far other than occasional mowing.

The timeframe for updating/revising the procedure is 30 days following implementation of a new structural stormwater control.

5.

75. Provide the procedure requiring new applicant-owned or operated facilities or new structural stormwater controls for water **quantity** be designed and implemented in accordance with the post-construction stormwater runoff control performance standards and long-term operation and maintenance requirements.

City of Flushing Stormwater Ordinance was adopted 3-9-2015.

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

At a minimum, the procedure shall include assessing the following municipal operation and maintenance activities if applicable:

- Road, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)

- Bridge maintenance
- Right-of-way maintenance
- Unpaved road maintenance
- Cold weather operations (e.g., plowing, sanding, application of deicing agents, and snow pile disposal)
- Vehicle washing and maintenance of applicant-owned vehicles (e.g., police, fire, school bus, public works)

See table next page.

6.

77. Provide the procedure for prioritizing applicant-owned or operated streets, parking lots, and other impervious infrastructure for street sweeping based on the potential to discharge pollutants to surface waters of the state. The procedure shall include assigning a priority level for each parking lot and street and the associated cleaning schedule (i.e., sweeping frequency and timing) based on preventing or reducing pollutant runoff. The procedure shall include a process for updating/revising the priority level giving consideration to street sweeping findings and citizen complaints. *A recommended timeframe for updating/revising the prioritization is 30 days following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface or within 30 days of identifying a need to revise a priority level.*

All streets and parking lots are swept a minimum of twice a year. Streets and lots in the downtown area are swept weekly which is the area that accumulates the most trash & debris. Other areas may be done more often as needed.

Updates/revising the prioritization is 30 days following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface or within 30 days of identifying a need to revise a priority level.

78. Provide the geographic location of the streets, parking lots, and other impervious surfaces in each priority level using either a narrative description or map.

See map at the end of this attachment.

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

The City uses a Johnston V-3000 street sweeper in accordance with the manufacturers operating instructions.

In the fall we offer curb side leaf collection. We use a small tractor with a front mounted push broom to push leaves into a rear load garbage truck. The leaves are then hauled away by our waste contractor.

We then follow-up behind with the street sweeper.

80. Provide the procedure for dewatering and disposal of street sweeper waste material. A compliance assistance document titled *Catch Basin Cleaning Activities Guidance Document* is available at http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf,

Street sweeper waste material is put into a container provided by our waste contractor and is removed by the same contractor.

8.

81. Provide the procedure requiring the applicant's pesticide applicator to be certified by the State of Michigan as an applicator in the applicable category, to prevent or reduce pollutant runoff from vegetated land. A description of the categories is located at http://www.michigan.gov/mdard/0,4610,7-125-1569_16988_35289-11992--,00.html

The City has an on-staff Certified Applicator licensed by the Michigan Department of Agriculture in categories 2, 3A, 3B, 6.

82. Provide the employee training program to train employees involved in implementing the pollution prevention and good housekeeping program. The program shall include the training schedule. At a minimum, existing staff shall be trained once during the permit cycle and new hires within the first year of their hire date.

DEQ Industrial Stormwater Certified Operator Training.

Pollution Prevention/Good Housekeeping for Municipal Operations Manual of BMP's.

All current employees have attended one of these training classes.

83. Provide the procedure requiring contractors hired by the applicant to perform municipal operation and maintenance activities comply with all pollution prevention and good housekeeping BMPs as appropriate. The procedure shall include the process implemented for providing oversight of contractor activities to ensure compliance.

Contractor certification of stormwater regulations will be obtained through contract documents.