# STORM WATER MANAGEMENT PROGRAM

**FOR**

# THE CITY OF GROSSE POINTE PARK

**MUNICIPAL SEPARATE STORM SEWER SYSTEM**

**PREPARED FOR:**

**THE CITY OF GROSSE POINTE PARK**

**by Cowles Environmental**

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# Abbreviations & Acronyms

| | |
|---|---|
| BMPs | Best Management Practices |
| City | City of Grosse Pointe Park |
| CRWC | Clinton River Watershed Council |
| DPW | Department of Public Works |
| *E. coli* | Escherichia coli |
| EGLE | Michigan Department of Environment, Great Lakes & Energy |
| Federal Act | Federal Water Pollution Control Act, as amended (33 USC 1251 et seq) |
| IDEP | Illicit Discharge Elimination Program |
| MEP | Maximum Extent Practicable |
| MS4 | Municipal Separate Storm Sewer System |
| NPDES | National Pollutant Discharge Elimination System |
| O&M | Operation and Maintenance |
| OSDS | Onsite Sewage Disposal Systems |
| PEAS | Pollution Emergency Alerting System |
| PEP | Public Education Plan |
| SEMCOG | Southeast Michigan Council of Governments |
| SESC | Soil Erosion and Sedimentation Control |
| State Act | Michigan Act 451, Public Acts of 1994, as amended |
| SWMP | Storm Water Management Program |
| TMDL | Total Maximum Daily Load |
| WQS | Water Quality Standards |

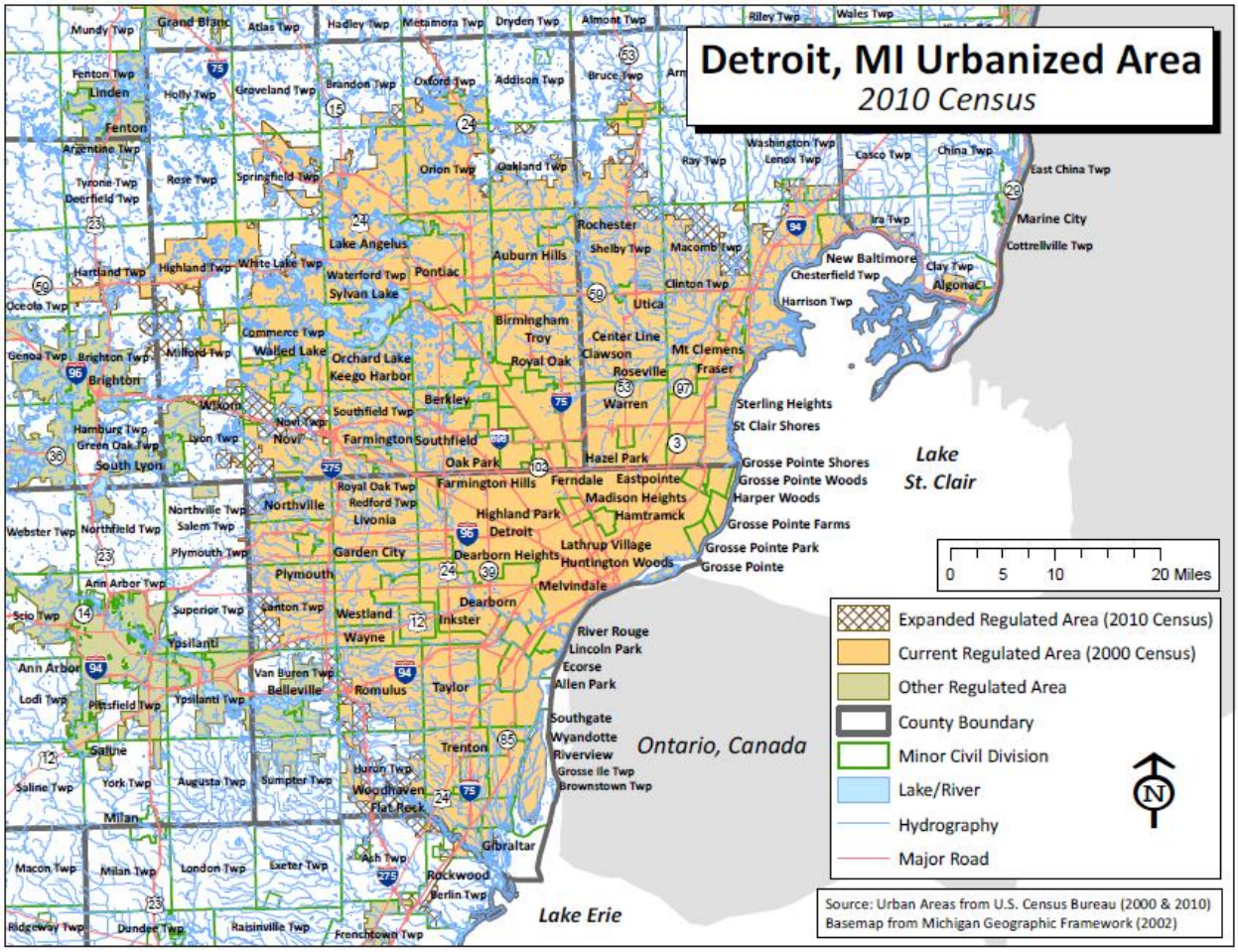
# 1 Purpose

The purpose of this Storm Water Management Program (SWMP) is to comply with the provisions of the Federal Water Pollution Control Act, as amended (33 USC 1251 et seq; the "Federal Act"), Michigan Act 451, Public Acts of 1994, as amended (the "State Act") Part 31, and the Michigan Part 21 Rules, Wastewater Discharge Permits (R 323.2101 et seq.). The SWMP is designed to do both of the following:

(a) Reduce the discharge of storm water pollutants to the maximum extent practicable (MEP), and

(b) Protect water quality and satisfy the appropriate water quality requirements of the Federal and State Acts.

**Figure 1 – Map of the Detroit Urbanized Area**



# 2 Background

The City of Grosse Pointe Park (City) lies entirely within the Detroit Urbanized Area (See Figure 1) designated by the US Census Bureau and therefore is required to obtain a National Pollutant Discharge Elimination System (NPDES} discharge permit. Most of the City is served by a Municipal Separate Storm Sewer System (MS4), but the Department of Public Works (DPW) facility located at 1005 Wayburn Street, most of Patterson Park, and most of Windmill Pointe Park are served by combined sewers. Only the portion of the City served by the MS4 comprises the "regulated area" (See Figure 2). As a waterfront community, having many water-oriented active and passive recreational opportunities, the City recognizes the importance of proper storm water management. This direct stormwater drainage can have a significant impact on waterfront activities in the City as well as in Lake St. Clair as a whole.

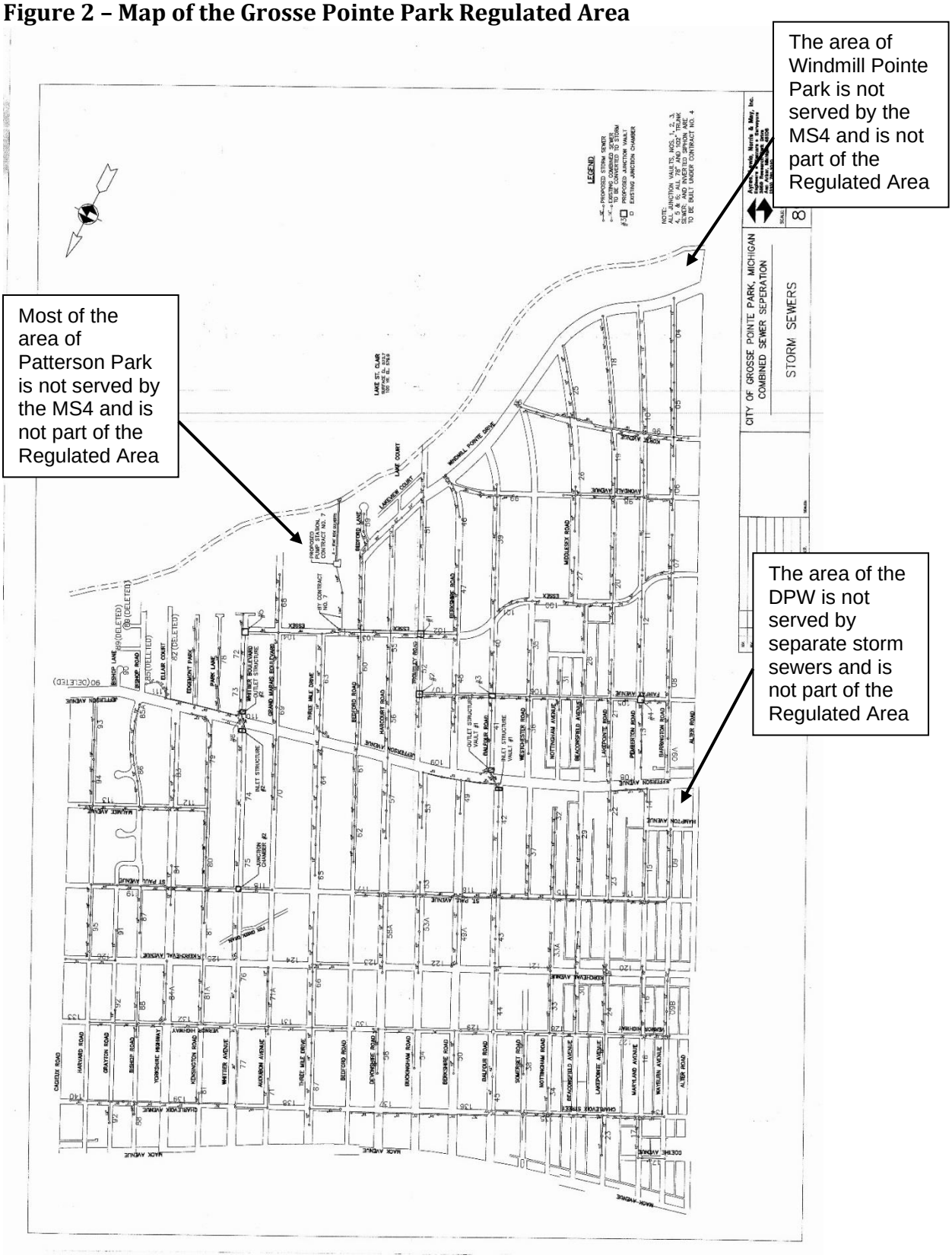
The City is committed to minimizing the impact of its drainage through the implementation of this Storm Water Management Program.

Grosse Pointe Park is an affluent city in Wayne County in the U.S. state of Michigan. The population was 11,555 at the 2010 census. Bordering on Detroit with frontage on southern Lake Saint Clair, it is the westernmost of the noted Grosse Pointe suburbs, with the oldest overall housing stock of the five cities. Grosse Pointe Park is 6 miles (9.7 km) east of downtown Detroit and thus is home to many who commute to the city on a daily basis.

The City has a total area of 3.71 square miles, of which, 2.17 square miles is land and 1.54 square miles is water. The water is part of Lake St. Clair. There are no other surface waters within the City.

As a commercial waterway, Lake St. Clair is a vital link to the world for the distribution of the invaluable natural resources of Michigan and Canada providing an anchor to the economic influence in the region. Waterborne commerce exceeds 60 million shipping tons per year; of which nearly 40 million originates in Michigan and includes iron ore, limestone, coal, and grain.

## Figure 2 – Map of the Grosse Pointe Park Regulated Area



The neighborhoods in Grosse Pointe Park are built on a standard grid street pattern which flows out of Detroit, and housing ranges from tightly-packed single- and multi-family brick houses, often rentals, on the far west side of the Park, to rows of traditionally-styled single family homes generally averaging over 3,000 square feet, to multi-million dollar mansions, some of which are found on the lakeshore. The west side of the city features mixed-use neighborhoods, where retail, schools, and churches are within close walking distance. The rest of the city is basically residential, but at the eastern edge residents are in close walking distance to "the Village" shopping district in Grosse Pointe. Many of the houses in the Park were built prior to World War II, and many of these were designed by noted architects using the finest materials. Windmill Pointe Drive, and streets such as Bishop, Kensington, Yorkshire, Edgemont Park, Three Mile Drive, Devonshire, Buckingham, Berkshire, Balfour, and Nottingham among others, each have dozens of large, architecturally significant homes. These mansions and mini-manses were often placed on large lots which were often split up, the result being that some post-war ranch style homes are mixed in with homes of traditional design.

Grosse Pointe Park includes a large neighborhood located on Windmill Pointe, a once-swampy piece of land roughly south of Jefferson Avenue, the edge of which marks the entrance to the Detroit River and the end of Lake St. Clair.

Windmill Pointe Park, Grosse Pointe Park's active park, is located at Barrington and Windmill Pointe Drive. This is where the majority of recreational programs originate and are carried out. Facilities include an Olympic size swimming pool, wading pool, bath house, the marina, a fishing pier, a privately operated concession stand, four lighted tennis courts, two sand volleyball courts, two horseshoe pits, playground equipment, picnic tables and grills. Also located at Windmill Pointe Park are the Tompkins Community Center and the Lavins Activity Center. The Lavins Activity Center houses a theater, fitness center, and gymnasium. At the foot of Three Mile Drive, is another large park, Patterson Park, which is known for its skating rink and walking trails.

As citizens use Lake St. Clair for both active and passive recreational enjoyment, they take responsibility to do what they can to protect this precious natural resource. Boaters already know that Lake St. Clair is a relatively shallow lake. The lake, averaging only 10 foot in depth with many areas as low as 3 feet, requires periodic dredging. This shallow depth makes it vulnerable to outside unnatural influences.

Grosse Pointe Park actively participates in the Clinton River Watershed Council as one of the communities in the Lake St. Clair Direct Drainage Sub-watershed. As evidenced by improved water quality and vibrant habitat, the City has made great progress in meeting the early goals. The Watershed Council is a consortium of Cities, Townships, Counties, School Districts, and other environmental interests that directly contribute to the water quality of Lake St. Clair. Along with these other organizations, the City continues to strive for the highest quality of water for our continued use and for future generations.

The entire City was once served by combined sewers and during wet weather raw sewage was discharged directly to Fox Creek and/or Lake St. Clair. However the City's Sewer Separation Program eliminated all of the Combined Sewer Overflows leaving only the DPW, most of Patterson Park, and most of Windmill Pointe Park with combined sewers. A very discrete area of the south parking lot in Windmill Pointe Park has two very small separate storm sewers discharging to Fox Creek. Most of the roof drainage of Tompkins Community Center and the Lavins Activity Center in Windmill Pointe Park is directed to the combined sewer. The remainder discharges to the ground surface. The north parking lot drains to the combined sewer. None of the stormwater generated in Windmill Pointe Park enters the MS4. In Patterson Park four catchbasins near the entrance drain to the combined sewer to the north. The skating rink, tennis courts, and Lindell Lodge drain to the combined sewer to the west. The parking lot and restrooms drain to the combined sewer to the east. The children's splash pad and play area drain to the MS4 outfall. The remainder simply soaks into the ground.

The Municipal Separate Storm Sewer System has exactly one discharge point or "outfall" (See Figure 3) that discharges to Lake St. Clair via a stormwater pumping station located in Patterson Park. See Table 1.

## Table 1 – Listing of Outfalls and Points of Discharge

| Outfall No. | Name | Latitude | Longitude | Receiving Water |
|---|---|---|---|---|
| 001 | Patterson Park | N42° 22.314' | W82° 55.224' | Lake St. Clair |

## Figure 3 – Outfall 001

# 3 Storm Water Management Program

## 3.1 Enforcement Response Procedure

The Storm Water Management Program (SWMP) is implemented by the City of Grosse Pointe Park utilizing the following Enforcement Response Procedure. Actions will be taken to control storm water pollution to the maximum extent practicable, including, where appropriate, enforcement action. Instances of non-compliance will be tracked from initial report/discovery to verification of resolution. An example tracking sheet is included in Appendix 1.

The City uses education, assistance, and enforcement to assure compliance with the SWMP. The City views enforcement as only one tool available to achieve compliance. In general, the least onerous remedies will be utilized to achieve compliance. Enforcement in and of itself is not a goal – compliance is the goal.

- Enforcement actions must be timely.
- Enforcement actions must be appropriate to the violations alleged.
- Enforcement actions must be consistent for like violations.
- Enforcement actions in response to repeat or continuing violations must be progressive in nature.
- Enforcement actions must be responsive to program priorities and needs.

By judiciously using education, assistance, and enforcement tools, the goals of reducing the discharge of storm water pollutants to the maximum extent practicable (MEP) and protecting water quality should be met.

It is not wise to be overly prescriptive regarding responses because every instance of a violation is unique. Obtaining cooperation and compliance through communication and understanding is far superior to resentful compliance gained through citations and fines. The remedies are likely to be longer lasting and result in fewer violations in the long term.

The following are examples of education, assistance, and enforcement that will be considered with suggested timelines:

- A landscaper is observed blowing lawn clippings into the street. The city staff member stops what they are doing and immediately seeks the job foreman on the site. The job foreman is informed that the lawn clippings are pollutants and that they will result in pollution of Lake St. Clair unless properly handled. A copy of “What Every Landscaper Must Know About Stormwater” is provided to the foreman. The landscaper sweeps up the clippings and removes them from the site for proper

disposal. The city staff member fills out the "Water Pollution Report - Non-Compliance and Illicit Discharge Tracking Sheet" (see Appendix 1) and forwards it to the Stormwater Coordinator.

- A homeowner is attempting to repair a broken section of his driveway with ready-mix concrete prepared in a rented mixer. Things go wrong and matters get out of control. Diluted concrete starts flowing into the street. City DPW staff observes the potential disaster and offers assistance. The City Vactor is called in to prevent the concrete from entering the storm sewer. The homeowner is informed that the concrete could have damaged the storm sewer and/or polluted Lake St. Clair. Had the homeowner been a contractor, the contractor would have been billed for the city services and potentially fined. Since the homeowner had no prior incidents, he was only given a warning. The city staff member fills out the "Water Pollution Report - Non-Compliance and Illicit Discharge Tracking Sheet" (see Appendix 1) and forwards it to the Stormwater Coordinator.
- A contractor is building a home expansion, pool, pool-house, garage, and driveway that disturbs more than one acre of land. During a rain event muddy water is observed leaving the construction site and entering the city storm sewer. The city staff member calls the Stormwater Coordinator and reports on the situation. The Stormwater Coordinator immediately investigates and confirms the illicit discharge. The contractor is ordered to immediately stop the discharge of pollutants. The contractor, not knowing what to do, asks for help from the city. The Stormwater Coordinator recommends that the contractor hire one of several pollution emergency abatement companies active in the area. Mobilization of the abatement company is not instantaneous thus sediment reaches Lake St. Clair. The Stormwater Coordinator notifies EGLE and Wayne County Soil Erosion staff. Since a Wayne County Soil Erosion Control permit was not issued, Wayne County commences enforcement action. The city requires the contractor to sweep the sediment off the street and to clean the storm sewer. The Stormwater Coordinator fills out the "Water Pollution Report - Non-Compliance and Illicit Discharge Tracking Sheet" (see Appendix 1). The matter is referred to the city attorney for civil action regarding the violation of several city ordinances including unauthorized use of the storm sewer, building permit violations, and planning and zoning violations.

## 3.2 Nested Jurisdictions

A city, village, or township (primary jurisdiction) may have, within its political or territorial boundaries, "nested" drainage systems owned or operated by public bodies that include, but are not limited to, public school districts; public universities; or county, state, or federal agencies. If the primary jurisdiction and the nested jurisdiction agree to cooperate in carrying out the responsibilities for control of the drainage system, the nested jurisdiction does not need to apply for a separate storm water drainage system permit. Otherwise, the nested jurisdiction shall apply for a permit.

The City has NOT entered into a cooperative agreement to carry out the terms and conditions of the Federal and State Acts with any jurisdiction.

# 4 Public Participation/Involvement Program

## 4.1 Public Notification

The City will comply with state and local public notice requirements when implementing a public involvement/participation program related to the stormwater management program. Currently there are no state or local public notice requirements when implementing a public involvement/participation program related to the stormwater management program.

## 4.2 Opportunity for Public Participation and Involvement

The City intends to have the SWMP document available for public inspection and comment at the City Hall and on the City website within 2 months of being approved by EGLE. The public will be notified of its availability in the following quarterly newsletter sent to all residents. It will state that public comments should be directed to the City Manager. Pertinent comments will be addressed in a timely manner, possibly resulting in modification of the SWMP.

# 5 Public Education Program

## 5.1 Public Education Program Collaboration

A storm water management program for a regulated MS4 shall include a plan for implementing a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.

The City is collaborating with the Clinton River Watershed Council (CRWC), along with many other municipalities, to implement an effective Public Education Program for the entire Clinton River/Lake St. Clair Direct Drainage Watershed.

The CRWC completed a watershed wide Collaborative Public Education Plan (PEP) to inform the public within the Clinton River Watershed about their role in protecting water quality and preventing storm water pollution. This plan was created by the municipalities and other partners in the Clinton River Watershed with the input of stakeholders and professionals in the environmental education field. This plan outlines the public education goals and messages that must be communicated under the requirements of the National Pollutant Discharge Elimination System (NPDES) Phase I and Phase II regulations. The PEP also describes the existing and future efforts the communities and other partners will undertake to achieve these education goals, and how these efforts will be evaluated. The PEP was approved by EGLE on February 4, 2019 and is included here as referenced in Appendix 4.

## 5.2 Permittee Specific Activity and Actions

The Collaborative Public Education Plan calls on each of the participating municipalities to fulfill certain activities and actions individually. The City commits to the following activities and actions.

### 5.2.1 Presentations and Displays

Provide displays at permittee building(s) or events to the public at least once in the next 5 years. Provide presentations for water quality-related events upon request and availability of staff time.

### 5.2.2 Regional Public Education Efforts

Continue to participate in the Southeast Michigan Partners for Clean Water group facilitated by the Southeast Michigan Council of Governments (SEMCOG) and support/share the resources available from this group, including: Seven Simple Steps to Clean Water brochures, tip cards and kids activity sheets.

Topics include: fertilizer, car care, pet care, household hazardous waste disposal, earth-friendly landscaping, water conservation and storm drain awareness. Materials from the "Our Water. Our Future. Ours to Protect" campaign will be distributed to MS4 permittees on an ongoing basis via mailings, website, and events or at permittee facilities.

### 5.2.3 Subwatershed Website

Hosted by CRWC website; features subwatershed map, photos, description, events and links to education resources. MS4 permittees will provide links to the CRWC website on their own websites.

### 5.2.4 Community Information

Write or distribute articles about watersheds, green infrastructure, watershed friendly practices for homeowners, and other stormwater pollution related topics for publication into existing municipal newsletters, e-newsletters and websites; Four articles per year will be given to MS4 permittees from CRWC for publication in newsletters and other publications. MS4 permittees will distribute these articles to the public each year via print or digital media.

### 5.2.5 Household Hazardous Waste Information

Continue to publicize information on proper Household Hazardous Waste Disposal via web links, newsletters, or brochures. For Wayne County: https://www.waynecounty.com/departments/environmental/landresources/household-hazardous-waste.aspx .

### 5.2.6 Recreational Vehicle Waste Dumpsites

Post links and/or locations to recreational vehicle (RV) waste dumpsites in the region and the State of Michigan. One such link is http://www.rvdumps.com/dumpstations/michigan .

### 5.2.7 Riparian Information Distribution

Distribute riparian landowner educational material such as the Waterfront Wisdom brochure, or other information. Make available to their public via mailings or through web links, events, meetings, and through mailings.

### 5.2.8 Stormwater Education for Industrial and Commercial Facilities

Provide educational materials and BMP fact sheets to industrial and commercial facilities. Target 2 sectors per year. Distribute BMP information via email or other means that is created specifically for each sector.

## 5.3 Procedure for Evaluating and Determining Effectiveness

A variety of mechanisms will be employed to determine effectiveness. Some will quantify the usage of materials (e.g. number of materials distributed, website hits) and participation in events (e.g. number of attendees at a presentation or workshop, number of participants at an event). These mechanisms can be useful in determining whether the education effort is reaching the audience; however, it is difficult to evaluate behavior change resulting from the education activity using these purely quantitative methods. The Clinton River Watershed Council will use an online survey tool to measure post contact behavioral changes. For example; email addresses will be collected from all CRWC facilitated event attendees, 60-90 days following the event an email with a link to the online survey will be sent asking the participant some questions about their general knowledge and behavior changes. While the surveys are not scientifically significant the results of the survey can help mold the Public Education Efforts throughout the Region.

# 6 Illicit Discharge Elimination Program

Under the illicit discharge elimination program, the City performs all of the following:

(i) Maintains a storm sewer system map, showing the location of all outfalls the City owns or operates, or points of discharge into an MS4 owned or operated by another public body, and the names and location of all waters of the state that receive discharges from the City's MS4.

(ii) Implements a plan to detect and address non-storm water discharges to the municipal separate storm sewer system, including illegal dumping and failing on-site sewage disposal systems as appropriate.

(iii) Informs public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste into the municipal separate storm sewer system.

(iv) To the extent allowable under state or local law, effectively prohibits, through ordinance, or other regulatory mechanism, non-storm water discharges into the municipal separate storm sewer system and implements appropriate enforcement procedures and actions. Discharges already authorized under an NPDES permit are excluded from this requirement. Discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the state. The following categories of non-storm water discharges or flows are prohibited only if identified as significant contributors to violations of state water quality standards:

(A) Water line flushing.
(B) Landscape irrigation.
(C) Diverted stream flows.
(D) Rising ground waters.
(E) Uncontaminated ground water seepage into storm sewers.
(F) Uncontaminated pumped ground water, except for groundwater cleanups.
(G) Discharges from potable water sources.
(H) Foundation drains.
(I) Air conditioning condensation.
(J) Irrigation water.
(K) Springs.
(L) Water from crawl space pumps.
(M) Footing drains.
(N) Lawn watering.
(O) Water from noncommercial car washing.
(P) Flows from riparian habitats and wetlands.
(Q) Residential swimming pool discharges and dechlorinated swimming pool discharges.
(R) Street wash water.

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

"Illicit discharge" means any discharge to, or seepage into, a separate storm sewer that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or litter; collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

The City has implemented and continues to implement a program to find, prioritize, and eliminate illicit discharges as described in the following sections.

## 6.1 Methods for Finding Point Source Discharges

### 6.1.1 Field Verification of Point Sources

During the design stages of the City's Sewer Separation Program, historical blueprints, maps and site plans were reviewed and field surveys were conducted to identify all point source discharges to Lake St. Clair. Upon completion of the City's Sewer Separation Program initial testing of the outfall was performed and no problems and or issues were identified. Inspection of the outfall is performed after every significant wet weather event and removal of any sediment and debris is conducted yearly. The storm sewer system is routinely cleaned and televised upon need.

The City will continue to inspect the outfall and also survey the Lake St. Clair shoreline for any previously undetected storm water outfalls. Each outfall will be located using a handheld global positioning system (GPS), photographed and surveyed for signs of an illicit discharge. This survey will include an olfactory and visual screening of the discharge, the surrounding lake shore condition, if applicable, and the outfall structure and vegetation conditions.

### 6.1.2 Staff Training

Staff participating in IDEP activities, including outfall surveyors and field staff, will be trained on the following topics:

- Definition of illicit discharges and illicit connections
- Techniques for finding and identifying illicit discharges and illicit connections
- Recognizing naturally occurring phenomena and their sources (i.e. bacterial sheens, slimes, films, etc.)
- Techniques for sampling, analyzing and recording results

- Proper methods and procedures for eliminating the illicit discharges and illicit connections
- Safety issues associated with IDEP activities

### 6.1.3 Complaint Line

Continuing efforts to identify new and/or previously unidentified point sources of illicit discharges will be enhanced through the continued utilization of observations made by the public. Pollution reports from the public are typically made to the City's Public Service Department (313-822-6200) and to the 24-hour Public Safety Department hotline (313-822-7400) for emergency situations. The personnel responding to citizen reports have received training on how to properly respond to pollution concerns. This effort, coupled with an expanded public education effort allows the public to assist in identifying illegal dumping. As part of the effort, the City will follow-up on these reports. The target response time will recognize that some complaints are not immediate concerns (e.g. the neighbor occasionally blows lawn clippings into the street), while others may demand immediate actions (e.g. a landscaper's tank ruptured, and hundreds of gallons of nitrogen fertilizer are pouring into the street). Obviously, the latter example requires immediate attention while the former may take a week to respond.

In addition to the City's self-supported resources, the City also relies on the Wayne County's 24-hr environmental hotline (888-223-2363) to handle pollution complaints.

The City will maintain a database (See Appendix 1) of all pollution reports received. This database will record both status and outcome, and will serve to evaluate the effectiveness of illicit discharge elimination efforts. Effectiveness will be determined on the number of calls received and the number of discharges eliminated. This information will be included in the progress report.

### 6.1.4 Outfall Survey

A dry weather outfall survey was last completed in 2013 and will be repeated during the term of each five year permit. Screening will include noting observations of the following physical characteristics:

- Flows during dry weather conditions
- Water clarity and color
- Presence of foam, oil sheen, trash, and/or floatable materials
- Presence of bacterial sheen or slimes
- Staining of the banks, outfall structure, and/or vegetation
- Excessive vegetative growth
- Odor

Any outfall discharging during dry weather will be sampled for conductivity and *E. coli*. The sample may be screened for surfactants if it has signs of soap suds or foam. The data collected during these surveys will be organized in a database. Effectiveness of the City's efforts will be based on the number of drains inspected, the number sampled, and the number placed on the priority list. This information will be included in the progress report.

### 6.1.5 Prioritizing of Illicit Discharges/Illicit Connections for Elimination

If a potential illicit discharge is identified, the drain will be placed on a priority list for follow-up and corrective action. Discharges having the greatest impact on the lake will have top priority if multiple events occur simultaneously. Illicit discharges will likely be identified through different methods, thus each discharge will have different information available regarding it. In each case, the best, most immediate, and permanent resolution will be identified and pursued. Factors in determining the solution will consider any and all information regarding the specific illicit discharge, and may include:

- Ambient water quality analysis;
- Dry weather observations;
- Chemical and bacterial analysis;
- Video observations of sewers;
- Dye testing (with EGLE permit) and smoke testing results; and
- Evaluation of impacts on receiving waters, fauna, or flora.

Effectiveness will be determined on a biennial basis. The City will actively maintain an inspection record of illicit discharges and review and improve the prioritization between illicit discharges. This review, and an estimate of volume, loading, and location, will be included in the progress report.

## 6.2 Source Investigations

The City will investigate suspicious discharges that are found to be utilizing the MS4. First, a visual survey of the drain will be completed attempting to trace the path of the discharge, thus identifying the source of such a discharge. Although various methods may be used, the City anticipates that the most effective method will be to observe and/or sample various manholes along the drain.

Investigative techniques will be adapted to the investigation at hand and the most effective but least environmentally obtrusive method will be sought in each case. These techniques may include but will not be limited to:

- Visual and olfactory surveys;
- Televising;
- Dye Testing (with EGLE permit); and

- Smoke Testing.

Once a source has been identified, the property owner will be notified within 30 days of discovery. The City will track the status of each suspected suspicious discharge that has been identified. Tracking will consist of a dated log of activities that have been performed to locate the source(s) of the problem. The City's goal is to have each illicit connection corrected within 90 days of notification to the property owner if a sanitary sewer is readily available and the cost for correction is not prohibitive for the property owner. However, if more complicated solutions are required, the City will set up a schedule for correction with each individual property owner. In the event that the property owner does not correct the problem within the agreed to time frame, the City will pursue legal action if necessary.

## 6.3 Progressive Enforcement Procedures for Eliminating Illicit Discharges

In past practice, the City has found that proactive cooperation and communication with property owners works better than heavy-handed enforcement. However, the City is prepared to pursue enforcement techniques when necessary. The City has developed and enforces a Stormwater Discharge Control ordinance, Ordinance No. 216 adopted on March 9, 2020, that specifically addresses illicit discharges. Several other ordinances complement these efforts. These ordinances include but are not limited to:

| | |
|---|---|
| Chapter 7 | BUILDINGS AND BUILDING REGULATIONS |
| Chapter 11 | FLOOD PREVENTION AND PROTECTION |
| Chapter 12 | GARBAGE AND REFUSE |
| Chapter 15 | NUISANCES |
| Chapter 16 | OFFENSES |
| Chapter 21 | STREETS, SIDEWALKS AND OTHER PUBLIC PROPERTY |
| Chapter 23 | UTILITIES |
| Chapter 27 | ZONING |

In each case, specific existing administrative procedures and enforcement efforts will be utilized and all efforts will be documented for the purposes of compliance with the IDEP.

If a drain outside the jurisdiction of the City is suspected to be improperly discharging into a City drain, the City will notify the appropriate jurisdiction in writing within 30 days of the discovery of the suspected discharge including any pertinent information pertaining to the suspected discharge. The City will track these notifications and do follow-up as necessary to assure that the responsible jurisdiction corrects the problem.

In addition, the City may also utilize the local enforcement options available in the Michigan Natural Resources and Environmental Protection Act (451 PA 1994, as amended) and/or the federal Clean Water Act.

Elimination of illicit discharges and illicit connections will be verified through onsite inspections by City personnel. If experience demonstrates that existing legal authority is not sufficient, the City will pursue appropriate ordinance revisions.

## 6.4 Methods to Minimize Seepage from Sanitary Sewers

During the course of follow-up investigations on a suspected illicit discharge, investigators may find that the source of an illicit discharge is a cross-connected or leaky sanitary sewer. If this is found, the appropriate steps will be undertaken by the City to eliminate the illicit discharge. If wet weather overflows of the sanitary sewer are detected during field investigations, they will be reported to the EGLE as required by Part 31, Section 3112a of the Natural Resources and Environmental Protection Act, Act 451 (PA 1994), as amended. Other discharges of polluting materials are discussed in Section 6.6.

As part of the City's sanitary sewer maintenance program, the City has developed and implemented a routine Sanitary Sewer Cleaning and Inspection Program for all sanitary sewers. Through this program all sanitary sewer lines are cleaned by city personnel. Upon completion of the cleaning, the sanitary sewer system is evaluated for structural integrity. The City will correct sanitary sewer problems within 180 days of discovery if funding is available. In any case where seepage is discovered, the City will place the problem on a schedule for correction and ask for funding in the following fiscal year.

## 6.5 Onsite Sewage Disposal Systems (OSDS)

Sanitary sewer service is available to all properties in the City, and the City is unaware of any properties that discharge sanitary waste to OSDS. If OSDS are found during the City's day-to-day operations, the Wayne County Department of Public Health will be notified for inclusion in their database. The City will uphold the Wayne County Department of Environmental Health Division Onsite Sewage Disposal System Evaluation and Maintenance Ordinance, effective countywide in September 2003. Any OSDS found within the City will be inspected under the guidelines of this ordinance.

## 6.6 Reporting Illicit Discharges to EGLE

In addition to sanitary sewer overflows discussed in Section 6.4, discharges of polluting materials from the city’s storm sewers will be reported to EGLE when such discharges are suspected to be capable of environmental impacts to Lake St. Clair based on professional judgment. Immediate reporting should be made to the EGLE Warren Michigan District Office at 586-753-3700 during daytime hours. After hours reporting should be made to the 24-hour Pollution Emergency Alerting System at 1 800-292-4706.

# 7 Construction Stormwater Runoff Control Program

The EGLE has determined that the Part 91 of the State Act and Michigan's Permit by Rule (Rule 323.2190) programs are "qualifying local programs" for the control of wet weather discharges from construction activities that result in a land disturbance of greater than or equal to one acre, or disturb less than one acre that is part of a larger common plan of development or sale. A "qualifying local program" provides control for soil erosion, offsite sedimentation, and other construction-related wastes, consistent with Federal storm water control requirements for MS4 permittees.

The Wayne County Department of the Environment is the approved "qualifying local program" for Wayne County. The following is the current contact information:

**Table 2 – Wayne County Soil Erosion Contact Information**

| Part 91 Agency | Contact Person | Phone | Fax |
|---|---|---|---|
| Wayne County Department of the Environment<br>3600 Commerce<br>Court Building E<br>Wayne, MI 48184 | **Patrick Cullen**<br>Division Director<br>pcullen@waynecounty.com | 734-326-3936 | 734-326-4421 |

The City has developed and is implementing procedures to ensure adequate protection of the MS4 from construction storm water runoff. The City's Building Permit Application includes a certification by the Building Permit applicant that the applicant is aware that a Soil Erosion and Sedimentation Control Permit may be needed from the County and that a National permit for storm water discharge from construction activity may be needed from the EGLE.

When pollutants are discharged from construction site activity in violation of Michigan law, and the pollutants enter the City's MS4:

- The City will notify the Part 91 agency (above) and the EGLE when soil or sediment is discharged.
- The City will notify the EGLE when other pollutants are discharged.

If the City suspects the discharge may endanger public health or the environment, the discharge will be reported to EGLE within 24 hours of becoming aware of the discharge. The notification will include (if known) the name of the person responsible for the discharge, the location of the discharge into the MS4, the location where the MS4 discharges to the surface waters, the nature of the discharge and the pollutants, and clean-up and recovery measures taken or planned.

Notice to EGLE will be given to:

Ms. Melinda Steffler
Warren District Supervisor
EGLE Water Resources Division
27700 Donald Court
Warren, MI 48092-2793

stefflerm@michigan.gov
(586) 208-5075

If the notice is provided after regular working hours, the EGLE's 24-Hour Pollution Emergency Alerting System (PEAS) will be used: PEAS telephone number: 1-800-292-4706.

The procedures ensure adequate allowance for soil erosion and sedimentation controls (SESC) on preliminary site plans, as applicable. The procedures ensure proper handling of complaints or other information submitted by the public regarding construction activities discharging wastes to the MS4.

# 8 Post-Construction Stormwater Runoff Program

The City has adopted Ordinance No. 216 to regulate treatment of stormwater for water quality. The ordinance recognizes that channel protection criteria shall not be required for discharges to Lake St. Clair. Currently, the only MS4 discharge is directly to Lake St. Clair.

**Figure 4 – Ordinance to Regulate Post-Construction Stormwater Runoff - Excerpts**

**Sec. 23-114. Purpose**.
(a) The purpose of this ordinance is to provide for the health, safety, and general welfare of the citizens of the City of Grosse Pointe Park through the regulation of stormwater and non-stormwater discharges to the municipal separate storm sewer system to the maximum extent practicable as required by federal and state law.

**Sec. 23-121 Requirements to prevent, control, and reduce stormwater pollutants by the use of best management practices**.

(a) The City may impose requirements identifying Best Management Practices (BMPs) for any activity, operation, or facility which may cause or contribute to pollution or contamination of stormwater, the MS4, or waters of the United States.

(e) New development and redevelopment projects that disturb one (1) or more acres, including projects less than one (1) acre that are part of a larger common plan of development or sale, and that discharge into the MS4, shall provide BMPs capable to treat the first one inch of runoff from the entire site such that the discharge does not exceed a concentration of Total Suspended Solids of 80 milligrams per liter (mg/l). The owner shall ensure long-term operation, maintenance, repair, and replacement of all necessary BMPs in perpetuity.

Wayne County's stormwater management program will be used as guidance in determining what BMPs will be required and the criteria for BMP design.

Wayne County Ordinance No. 2006-1114A is available at:

https://www.waynecounty.com/documents/environmental/Storm_Water_Ordinance06.pdf .

Wayne County Stormwater Administrative Rules are available at:

https://www.waynecounty.com/documents/environmental/Aministrative_rules.pdf

The Wayne County Storm Water Standards Manual is available at:

https://www.waynecounty.com/departments/environmental/waterquality/standards-manual.aspx

The City has developed and enforces several ordinances that will complement these efforts. These ordinances include but are not limited to:

Chapter 7 BUILDINGS AND BUILDING REGULATIONS

Chapter 11 FLOOD PREVENTION AND PROTECTION
Chapter 12 GARBAGE AND REFUSE
Chapter 15 NUISANCES
Chapter 16 OFFENSES
Chapter 21 STREETS, SIDEWALKS AND OTHER PUBLIC PROPERTY
Chapter 23 UTILITIES
Chapter 27 ZONING

Chapter 7 of the City Code Book adopts the State Construction Code which is administered by the City.

Sec. 7-1. Enforcement of State Construction Code Act

The City of Grosse Pointe Park assumes responsibility for administration and enforcement of the Stille-DeRossett-Hale Single State Construction Code Act and the Code promulgated thereunder.

The State Construction Code (STILLE-DEROSSETT-HALE SINGLE STATE CONSTRUCTION CODE ACT, Act 230 of 1972) requires that building permits be issued prior to start of construction of any building or structure. MCL 125.1510.

Sec. 10. (1) Except as otherwise provided in the code, before construction of a building or structure, the owner, or the owner's builder, architect, engineer, or agent, shall submit an application in writing to the appropriate enforcing agency for a building permit.

In the event that an infiltration Best Management Practice (BMP) is proposed as part of new development or re-development that disturbs one or more acre of soil where soil/groundwater contamination exists, a building permit will not be issued until it can be demonstrated that the BMP will not exacerbate the contamination. Developments in “areas with the potential for significant pollutant loading” will need to be addressed in the building permit application.

Long-term maintenance of stormwater Best Management Practices (BMPs) will be assured by requiring the applicant to comply with Chapter 10 of the Wayne County Ordinance, which states in part:

“(A) An applicant shall submit a long term maintenance plan as part of an application for storm water construction approval. At a minimum, the long term maintenance plan shall set forth

(1) the preventative maintenance activities necessary to ensure that the storm water management system will function properly as designed;

(2) a schedule describing the frequency with which preventative maintenance activities shall occur;

(3) the manner in which the applicant shall assure, through a legally binding instrument, that the storm water management system shall be maintained in perpetuity.

(B) Long-term maintenance shall include site monitoring to ensure that a storm water management system is functioning properly as designed; remedial actions necessary to repair, modify, or

reconstruct the system in the event the system does not function properly as designed at any time; notification to subsequent owners of limitations or restrictions on the property; actions necessary to enforce the terms of restrictive covenants or other instrument applicable to the property pursuant to the Ordinance and these rules and such other actions as may be set forth in the Ordinance or these rules promulgated hereto.

(C) As a condition of final approval of the storm water management system, an applicant for storm water construction approval shall demonstrate to the County that the storm water management system shall be maintained in perpetuity."

# 9 Pollution Prevention and Good Housekeeping for Municipal Operations

Municipal operations cover a wide variety of activities and land uses that are potential sources of storm water pollutants. These include: roadways; parking lots; transportation and equipment garages; fueling areas; warehouses; stockpiles of salt and other raw materials; open ditches and storm sewers; turf and landscaping for all municipal properties, including parks; and waste handling and disposal areas.

The City has developed and is implementing procedures to ensure compliance with a program of operation and maintenance (O&M) of Best Management Practices (BMPs), with the ultimate goal of minimizing pollutant runoff to the maximum extent practicable from municipal operations. The procedures use BMP guidance and training materials that are available from federal, state, or local agencies, or other organizations. Specific actions and implementation schedules for the BMP O&M program are provided.

## 9.1 Municipal Facility and Structural Stormwater Control Inventory

The City has completed an inventory of all 41 municipally-owned properties. The inventory identified no structural storm water controls. Therefore, the City's 900 catch basin sumps are the only Stormwater BMPs in the City. The inventory will be updated, if required, upon application for reissuance of the stormwater discharge permit.

## 9.2 Facility-Specific Stormwater Management

Each City-owned facility within the Regulated Area identified as having a discharge of stormwater to the City's MS4 has been assessed for the potential to discharge pollutants as follows:

| | |
|---|---|
| Patterson Park | Very Low |
| All other properties in the Regulated Area | Very Low |

The following factors were considered when assessing each facility:

- Amount of urban pollutants stored at the site
- Identification of improperly stored materials
- The potential for polluting activities to be conducted outside
- Proximity to Waterbodies
- Poor housekeeping practices
- Discharge of pollutants of concern to impaired waters.

## 9.3 Structural Stormwater Control Operation and Maintenance Activities

All City catchbasins located within the Regulated Area have been prioritized as “medium” for routine inspection, maintenance, and cleaning. There is no basis for differing priorities based on preventing or reducing pollutant runoff. City procedures for catchbasin cleaning have considered EGLE guidance on Catch Basin Cleaning Activities. Material removed from catch basins via Vactor truck should be considered pollutants. Any decant from the truck shall be to an approved sanitary sewer discharge location. All solid material shall be deposited in a designated area at the Windmill Pointe Park (14920 Windmill Pointe Dr, Grosse Pointe Park, MI 48230), where the liquid is allowed to drain off into a sanitary sewer. Once dry the material shall be disposed as solid waste.

The prioritization will be updated and revised giving consideration to inspection findings and citizen complaints as needed and upon application for NPDES permit renewal.

The City requires any new city-owned facilities to meet the same stormwater control criteria required of privately-owned facilities.

## 9.4 Municipal Operations and Maintenance Activities

The City has adopted the following procedure that calls for reducing the discharge of pollutants to the maximum extent practicable from O&M activities.

City employees (and contractors working on behalf of the City) shall perform all work in a manner that controls the discharge of pollutants to the maximum extent practicable. To accomplish this, dirty water may not be allowed to flow into the City’s storm sewer system or to Lake St. Clair. As part of doing any work, the City is taking preventive measures to stop pollutants from reaching storm sewers or the lake in case of rain or other circumstances.

- Road, parking lot, and sidewalk maintenance

  Maintenance typically involves using concrete, asphalt, and other materials to create impervious surface areas or repair existing road surfaces. Pollution control activities focus on ensuring that removed materials and concrete wastes remain controlled and are not released to the environment. Environmental stewardship practices for ready mix concrete operations include:

  1. Schedule activities for dry weather.
  2. Identify and protect nearby storm drains prior to breaking up, grinding, cutting, drilling, or resurfacing concrete.
  3. Limit the amount of concrete that is mixed and mix only what is needed for the job.
  4. Return leftover materials to the mixer and dispose of small amounts of hardened materials in the trash.

- Managing Roadside Vegetation

  Erosion can be seen in areas where tree roots are exposed, small furrows or channels begin to show, or sediment begins to collect in areas due to soil being exposed. Without vegetative cover along roadsides, soil erosion can significantly impact the environment. To prevent erosion plant vegetation with deep roots. Additional structural controls can be implemented to help prevent erosion, like terraces or a retaining wall. These catch runoff, giving water time to soak into the ground and also make attractive planting beds. Slope terraces by about two percent perpendicular to the incline to direct drainage to one side or the other.

- Cold weather operations

  During plowing operations of large areas, such as parking lots, it may become necessary to accumulate large piles of snow. Wherever possible, minimize the environmental impact from the snow melt of large piles.

  1. Pile snow on grassed areas or other porous surfaces to help prevent surface water contamination.
  2. Pile snow where there is an adequate depth of soil (approximately 30 inches) between the ground level and the water table. The soil and vegetation will act as a filter for pollutants in the melting snow.
  3. Avoid plowing snow into Lake St. Clair.
  4. Avoid piling snow on or near storm drains.
  5. Install a silt fence if piling snow near drains or the lake.
  6. Remove and properly dispose of accumulated trash when the snow melts.

- Vehicle washing and maintenance of city-owned vehicles

  When washing vehicles on-site, wash equipment and vehicles in designated facilities where the wash water drains to the sanitary sewer system. If it is necessary to clean equipment outdoors, do so in an area where cleaning water will not flow to the street or storm drain. This area should be isolated from the storm drain by 25', a berm, or curbing. Soap or detergent should not be allowed to reach a storm drain.

- Water and sewer repairs

  Care should be taken to ensure that spoil from excavations is not allowed to reach storm sewer inlets or Lake St. Clair. This can be challenging especially during emergency repairs or during rain events. Spoil piles should be covered at night and during rainfall. Dewatering water may not be discharged to storm sewers or allowed to reach Lake St. Clair. Disturbed soil should be stabilized with sod as soon as possible following the repair. All litter should be removed from the site.

- Street sweeping

  Currently the City sweeps its streets seasonally every 2-5 weeks. Sweeping methods shall be based on sweeping equipment manufacturer's recommendations. The procedure for sweeping the streets and for disposal of the material collected shall prevent pollution of Lake St. Clair. All streets and municipal parking lots in the Regulated Area are prioritized as "medium". The entire area is residential or commercial and there is no rationale for higher or lower priority. The prioritization will be updated and revised giving consideration to street sweeping findings and citizen complaints as needed and upon application for NPDES permit renewal. Material removed from streets and parking lots via street sweeper should be considered pollutants. Any decant from the truck shall be to an approved sanitary sewer discharge location. All solid material shall be deposited in the designated area at the Windmill Pointe Park (14920 Windmill Pointe Dr, Grosse Pointe Park, MI 48230), where the liquid is allowed to drain off into a sanitary sewer. Once dry the material shall be disposed as solid waste.

## 9.5 Managing Vegetated Properties

The City does not use Phosphorus fertilizers on lawns maintained by the City. Any pesticides or herbicides applied on City-owned property is accomplished by personnel certified by the State of Michigan.

## 9.6 Employee Training

The City ensures training for staff and contractors associated with potential storm water pollutant sources. Topics that affect the water quality entering the MS4 include:

- Storm water pollution sources and solutions
- Park and open space maintenance
- Construction and land disturbances
- Post-construction storm water management
- Storm water system maintenance
- Roadway and parking lot maintenance
- Other activities that are potential sources of storm water pollutants

The Training Topics, Employee Group, Training Frequency, and Training Type are identified in Appendix 3.

## 9.7 Contractor Requirements and Oversight

Contractors hired to perform operation and maintenance activities on City-owned property are required to receive stormwater training prior to starting work. Training may include the “What Every Earth Work Contractor Must Know About Storm Water” brochure developed by the City, the “What Every Landscaper Must Know About Storm Water” brochure developed by the City, a requirement to view a commercially produced storm water training video, or similar training. All work undertaken by contractors will be under the direct supervision of City personnel who will ensure that all City policies are followed and will inspect the work upon completion.

# 10 Total Maximum Daily Load Implementation Plan

The EGLE adopted a Total Maximum Daily Load (TMDL) for *E. coli* for Lake St. Clair Metropolitan and Memorial Beaches in August 2007. EGLE has determined that the City may contribute to the non-attainment in this area and has required that the TMDL be addressed in the City's Storm Water Management Program.

## 10.1 Priority Actions

The City does not admit that stormwater from the City contributes to the non-attainment at Metropolitan and Memorial Beaches. The TMDL establishes a "Waste Load Allocation" that mandates swimming water quality at the storm sewer outfall. This is not an attainable goal. However, the City commits to reducing *E. coli* in its storm water to the maximum extent practicable and thereby make progress towards that goal. The City identifies and prioritizes the following actions as high priority to reduce pollutants in storm water discharges from the MS4 and make progress in meeting Water Quality Standards (WQS) for *E. coli* in the TMDL area.

These HIGH-PRIORITY actions are:

- Corrections to faulty sanitary sewer connections
- Investigate pollution sources and illicit connections
- Pet waste stations and education
- Wildlife (geese) management in urban areas
- Storm drain marking or stenciling.

EGLE requires a monitoring plan/demonstration to assess effectiveness of the BMPs to make progress towards meeting the TMDL goal.

**TMDL Monitoring**

FIRST SAMPLING EVENT (Year 2 of the permit)
*Inspect the outfall during dry weather (if the outfall is submerged then at an upstream representative catch basin or manhole)*

*If flow is present: collect one dry weather sample and analyze for E. coli*

- *If the dry weather sample results > 1000 cts/100 ml the permittee shall increase implementation of high priority actions; focus on source elimination/confirmation; perform second sampling event*
- *If the dry weather sample results < 1000 cts/100 ml then the permittee shall collect a sample during wet weather and analyze for E. coli.*
  - *If the results < 1000 continue to implement high priority actions; perform second sampling event*
  - *If the results > 1000 increase implementation of high priority actions; focus on source elimination/confirmation; perform second sampling event*

*If flow is not present: collect a sample during wet weather and analyze for E. coli.*

- *If the results < 1000 continue to implement high priority actions; perform second sampling event*
- *If the results > 1000 increase implementation of high priority actions; focus on source elimination/confirmation; perform second sampling event*

SECOND SAMPLING EVENT (Year 4 of the permit)
*Repeat first sampling event.*

If elevated results (> 1000 cts/100 ml) are detected, sample within the sewershed to confirm elimination of sources.

Sampling wet weather flows is always difficult, because one never knows when rain will start and stop or how much rain will fall in any particular area. Then mobilizing staff to collect the sample and deliver it to a laboratory within approved holding time is difficult due to staffing hours. Therefore some flexibility is necessary.

Optimally, a wet weather sample should be taken after at least 0.25 inches of rain has fallen in the catchment area, preferably over 0.5 inches. The sample should be collected from the center of the flow stream and not be contaminated by sediment stirred up by the sample collection. To avoid the "first flush", which is notorious for high pollution levels and inconsistency, the sample should be taken after the time of concentration for the particular outfall. Without undertaking the effort of calculating the time of concentration, we estimate it to be between 30 minutes to an hour for Grosse Pointe Park.

Therefore, we would propose that the sample be collected from the outfall approximately an hour after discharge commences for a rainfall of over 0.25 inches in the first hour of the event. If the event continues for several hours, additional samples should be collected and the geometric mean of the sample results should be reported.

## 10.2 Assessment of Effectiveness

Evidence of accomplishing the priority actions will be reported in the periodic progress reports submitted to EGLE, including reports of illicit discharges reported by City staff or citizens, actions taken to address faulty sewer connections, and status of pet waste stations, urban wildlife management, and storm drain marking. Direct monitoring of Lake St. Clair Metropolitan and Memorial Beaches is not within the authority of the City so the City will rely on progress monitoring conducted by Huron Clinton Metropolitan Authority and Macomb County Health Department.

# Appendix 1 – Example Enforcement Tracking Sheet

City of Grosse Pointe Park

## Water Pollution Report

**Non-Compliance and Illicit Discharge Tracking Sheet**

| | | |
|---|---|---|
| **INCIDENT NUMBER** (provided by DPW) | | Entry made by: |
| **DATE** | | |
| **NAME OF PERSON MAKING REPORT** | | |
| **NAME OF VIOLATOR** | | |
| **LOCATION OF THE VIOLATION** | | |
| **DESCRIPTION OF THE VIOLATION** | | |
| **NAME OF INVESTIGATOR** | | |
| **DATE OF INVESTIGATION** | | |
| **RESULT OF INVESTIGATION** | | |
| **ACTION TAKEN** | | |
| **DATE ACTION WAS TAKEN** | | |
| **ACTION CONFIRMING RESOLUTION** | | |
| **DATE RESOLUTION CONFIRMED** | | |
| **ADDITIONAL INFORMATION** (include date of comment) | | |

City of Grosse Pointe Park

# Water Pollution Report

**Non-Compliance and Illicit Discharge Tracking Sheet**

# INSTRUCTIONS

When City employees or the public report on a situation that results or may result in water pollution, the report must be documented and transmitted to the Supervisor of Public Works. This form is provided to make the documentation and reporting as little burdensome as possible.

The purpose is to ensure that all reports of pollution are taken seriously and that the reports receive proper follow-up. The Supervisor of Public Works is responsible for follow-up and reporting the actions to the Michigan Department of Environmental Quality.

Incident numbers will be assigned by the Supervisor of Public Works.

The right column is to indicate the person entering the information on the form. In some cases this name will be the same as in the center column, but not necessarily. The first entry should spell out the name, but subsequent entries may use initials or quotation marks (”).

DATE – Is the date of the initial report. Inclusion of time of day may also be helpful.

NAME OF PERSON MAKING REPORT – This is usually obvious but some reports may be made anonymously. An attempt should be made to have the person making the report identify themselves with contact information for possible follow-up, but it is better to have an anonymous report than no report at all.

NAME OF VIOLATOR – This is not always known, but guesses are helpful. Simply identify in some way how certain the identity of the violator is.

LOCATION OF THE VIOLATION – A street address is best but other identifiers are often appropriate, such as street corner or facility name.

DESCRIPTION OF THE VIOLATION – Describe what was observed and why pollution is suspected. Was this a momentary event like a spill, a continuing event like pumping wastewater, or a potential event like pollutants that will likely flow to a drain when it rains?

The remainder of the form will usually be filled in by the Supervisor of Public Works or his/her designee.

ADDITIONAL INFORMATION – This space is for anything else that is important or potentially helpful. Indicate the date of entry as well.

The form should be emailed to:

Mr. Patrick Thomas
Supervisor of Public Works
thomasp@grossepointepark.org

For situations that appear to be urgent, the email should be immediately followed by a phone call to the Public Works Office at 822-5100.

# Appendix 2 – Structural Storm Water Controls

| Structural Storm Water Control Measure | Inspection Frequency | Maintenance Schedule | Operation & Maintenance Program (Location) | Effective Date or Projected Effective Date |
|---|---|---|---|---|
| **City streets** | | | | |
| Catchbasin sumps | Annually | 2-5 Years | DPW Office | August 2010 |

# Appendix 3 – Employee/Contractor Training Related to Storm Water Management Activities

| Training Topic | Employee Group | Training Date(s) | Training Type |
|---|---|---|---|
| Storm water pollution sources and solutions | All Employees | Annually | Poster or Flyer |
| Park and open space maintenance | Department of Parks and Recreation | Once every 5 years | Live Presentation, DVD or equal |
| Park and open space maintenance | Landscaping Contractor | Upon issuing a contract | Training required in bid documents |
| Construction and land disturbances | Building Department, Ordinance Enforcement | Once every 3 years | Live Presentation, DVD or equal |
| Post-construction storm water management | Building Department, Ordinance Enforcement | Once every 3 years | Live Presentation, DVD or equal |
| Storm water system maintenance | Department of Public Works | Once every 2 years | Recorded Presentation and/or Procedures Manual |
| Roadway & Parking Lot maintenance | Department of Public Works | Once every 2 years | Recorded Presentation and/or Procedures Manual |
| Traffic-related small spill response | Representatives of Fire, Police & Public Works Departments | Once every 2 years | Staff Meeting discussion topic, DVD, or Flyer |
| Other activities that are potential sources of storm water pollutants | Selected Employees | As Needed | As Appropriate |
| IDEP Awareness | Employees with Field Jobs | Once every 2 years | Staff Meeting discussion topic, Tip Card, DVD, or equal |
| IDEP – Conducting Follow-up inspections and locating the source | Selected Employees | Prior to conducting inspections | Live Presentation, DVD or equal |
| Advanced stormwater topics | Stormwater Manager & DPW Supervision | As Needed | Conference, Seminar, or Webinar |

# Appendix 4 – Collaborative Public Education Plan

## A.4.1 Clinton River Watershed Council Collaborative Public Education Plan

# Clinton River Watershed
# Anchor Bay
# Lake St. Clair Direct Drainage

**Collaborative Public Education Plan**

**Approved:**

**February 4, 2019**

Prepared by the Clinton River Watershed Council, approved by the Michigan Department of Environmental Quality, and included in this Storm Water Management Program by reference.