

Macomb Intermediate School District

Storm Water Management Program (SWMP)



Macomb Intermediate School District

44001 Garfield Road, Clinton Township, MI 48038

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Combined Nested District Stormwater Maps

Section I – Introduction and Permit Information

The National Pollutant Discharge Elimination System (NPDES) Program protects the surface waters of the state by assuring that discharges of wastewater comply with state and federal regulations. Anyone discharging or proposing to discharge wastewater to the surface waters of the State of Michigan must make an application for and obtain a valid NPDES permit prior to the wastewater discharge.

NPDES permits are required under Section 402 of the Federal Clean Water Act (the Federal Act), as amended (33 U.S.C. 1251 et seq., P.L. 92-500, 95-217), and under Part 31, Water Resources Protection, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (the Michigan Act). Part 31 of the Michigan Act also provides authority for the State to issue NPDES permits. The Michigan Department of Environment, Great Lakes and Energy (EGLE) administers the NPDES permit program for the State of Michigan. EGLE is the former Michigan Department of Environmental Quality (MDEQ).

Any public body that owns or operates a regulated Municipal Separate Storm Sewer System (MS4) may be eligible for permit coverage including, but not limited to, the United States, the State of Michigan, a city, village, township, county, public school district, public college or university, a single purpose governmental agency, or any other governing body which is created by federal or state statute or law.

Macomb Intermediate School District (MISD) and the nested school districts were previously nested under Macomb County Public Works Office (MCPWO) under their Certificate of Coverage (COC) MIG610052. MISD was notified by MCPWO by memorandum dated November 3, 2014 that the schools would no longer be nested under their COC or MCPWO's individual jurisdictional MS4 permit. MISD initially submitted a National Pollutant Discharge Elimination System Permit (NPDES) application for an individual jurisdictional Discharge of Stormwater to Surface Waters from a Municipal Separate Storm Sewer System (MS4) for MISD and nested school districts April 1, 2015. Based on comments received June 29, 2017, MISD submitted a revised application August 25, 2017. MISD and its consultant Anderson, Eckstein and Westrick, Inc. (AEW) through on-going communication have submitted supplements to the revised application up to and including an updated MISD IDEP and TMDL submittal dated October 29, 2018. This storm water management plan (SWMP) and the current permit application form incorporate updates to the previous supporting documents based on EGLE review comments and constitute a complete application.

Section II – Contact Information

The Macomb Intermediate School District (MISD) and their nested school districts owns and operates the regulated MS4 system. The MISD personnel responsible for the operation, maintenance and MS4 permit compliance are listed with their contact information in the Table on page 1 of the Storm Water Discharge Permit Application provided with this Storm Water

Management Plan (SWMP).

Section III – Permit Action

The Macomb Intermediate School District and nested school districts are primarily located within the Clinton River watershed. The Clinton River East Subwatershed (CREW), covers the final stretch of the river, from its discharge point in Harrison Township upstream to Shelby Township (where the river enters Macomb County). The CREW is a 132 square mile, Michigan Department of Environmental Quality (MDEQ)-approved basin that also incorporates the entire drainage area of the Middle Branch of the Clinton River.

The Watershed Management Plan (WMP) was developed by the CREW Subwatershed Advisory Group (SWAG) to: 1) fulfill the National Pollutant Discharge Elimination System (NPDES) Phase II requirements (EGLE's General Permit No. MIG619000 for Coverage of Storm Water Discharges for Municipal Separate Storm Sewer Systems Subject to Watershed Plan Requirements) for non-Phase I governmental units in the urbanized area; and 2) make all of the entities represented in the subwatershed eligible for various grant funding opportunities to implement actions for watershed improvement.

The MISD and nested school districts recognized that by working collectively with the other stakeholders on a regional and watershed basis illicit discharge elimination, public education and other water management activities, could be implemented more effectively and cost-efficiently. Subsequent to the further implementation and expansion of the NPDES Phase II requirements based on the 2010 Urbanized Areas Maps, the MISD and nested school districts applied for an individual jurisdictional permit as a Small MS4 on April 1, 2015.

Section IV – Regulated Area

MISD jurisdictional Boundary map is shown in Figure 01 below.

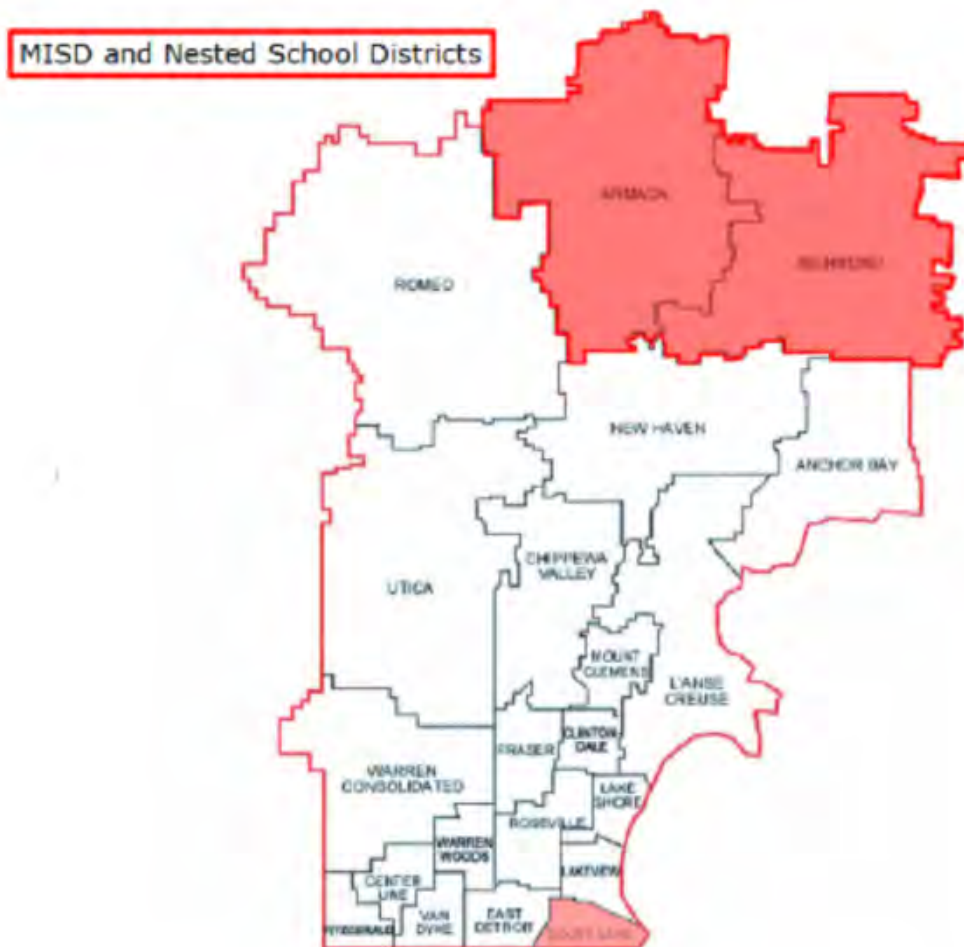


Figure 01: MISD and nested school districts

Urbanized area map within the jurisdictional boundary as defined by the 2010 Census included in Appendix A – Maps and Tables.

Section V – Discharge Points Location & Mapping

MISD owns and operates ten (10) facilities within their boundary and listed below,

1. Auxiliary Services Center (Millar Building)
2. Bozymowski Center for Education
3. Flynn Middle School
4. Glen H. Peters School
5. Keith Bovenschen School
6. Lutz School for Work Experience
7. Maple Lane Elementary School
8. MISD Educational Service Center/Bus Garage Complex
9. Neil Reid High School
10. Rockwell Junior High School

MISD operated and known discharge points from its owned and operated facilities into the County Drain System or other MS4s are identified in Appendix A – Maps and Tables as maps A-1 through A-9 and listed as Table 1 with the corresponding receiving County Drain, and the latitude and longitude of each is identified accordingly.

MISD Administration office maintains electronic digital copies and/or hardcopies of its MS4 infrastructure. District storm sewer maps are continuously revised to reflect any changes in the system, typically within 30 days of receiving updated information.

Newly Constructed or Identified Outfalls

In order to seek authorization for discharge, for any discharge point that is identified, constructed or installed after November 1, 2018, the District will provide an updated outfall map clearly showing the location of the discharge point, its identifying number, the latitude and longitude of the discharge point, and the receiving Macomb County Drain or waters of the state within thirty (30) days of the identification, construction or installation.

MS4 Discharge Point Labeling

The School District provide permanent identification for all of its outfalls/discharge points as required under the permit including stencil format or appropriate signage.

Section VI – Nested Jurisdictions

Macomb Intermediate School District (MISD) submitted a National Pollutant Discharge Elimination System Permit (NPDES) application for Discharge of Stormwater to Surface Waters from a Municipal Separate Storm Sewer System (MS4) for MISD and nested school districts and those are listed below and tables listing the facilities for each district are included in Appendix A – Maps and Tables:

- Anchor Bay School district
- Center Line Public Schools
- Chippewa Valley Schools
- Clintondale Public Schools
- Eastpointe Community Schools
- Fitzgerald Public Schools
- Fraser Public Schools
- L'Anse Creuse Public Schools
- Lake Shore Public Schools
- Macomb Community College
- Mount Clemens Community Schools
- New Haven Community Schools
- Romeo Community Schools
- Roseville Community Schools
- Utica Community Schools
- Van Dyke Public Schools
- Warren Woods Public Schools
- Lakeview Public Schools
- Warren Consolidated Schools

Recent updated Southeast Macomb Sanitary District (SEMSD) mapping of the combined/separated sewer system areas helped to clarify the MS4 coverage of some of the nested districts (see Appendix A - Table 1 per district).

Section VII – Stormwater Management Program (SWMP)

This Storm Water Management Program (SWMP) document is a compilation of several plans, programs, procedures, and policies, such as the School District's Action Plan, Illicit Discharge Elimination Plan (IDEP), and Public Education Plan (PEP). Combined these documents constitute the School District's permit obligations and commitments aimed at helping to reduce the discharge of pollutants from the drainage system to the Maximum Extent Possible (MEP). This includes implementing Best Management Practices (BMPs) to comply with the six minimum control measures (40 CFR 123.34(b)) and documenting the effectiveness of the BMPs. Documentation required under the individual jurisdictional permit shall be included in the required Biennial Progress Reports to be submitted to the EGLE every two years of the permit cycle.

Section VII.a – Enforcement Response Procedure

Macomb Intermediate School District and nested school districts are committed to performing complete stormwater management practices; including observance of and adherence to all local, state, and federal stormwater statutes, rules, and regulations. Enforcement of the policies, procedures, and best management practices (BMPs) outlined in this SWMP is the responsibility of the district Superintendent or their designee. Appendix D - Policy, Procedures and Regulations includes Policy S2 which describes the MISD and nested school districts Enforcement Response Procedure. Any questions on this policy and procedure should be directed to the Storm Water Manager. This procedure shall be reviewed on an annual basis by the Stormwater Manager for any updates to streamline the requirements.

Section VII.b – Public Participation/Involvement Program (PPP)

Engaging the public and encouraging public participations in the work to reduce the impacts of stormwater runoff is a main part of the public involvement/participation program. This procedure includes a description of the opportunities for the public to provide comment on the Stormwater Management Plan and inviting public involvement and participation in the implementation and period review of the Stormwater Management Plan (SWMP).

Appendix D – Policy, Procedures and Regulations includes Policy S1 which describes the MISD and nested school district Public Participation/Involvement Program (PPP). Any questions on this policy and procedure should be directed to the Storm Water Manager. This procedure shall be reviewed on an annual basis by the Stormwater Manager for any updates to streamline the requirements.

Section VII.c – Public Education Program (PEP)

Public Education Program is designed to promote stormwater pollution prevention, publicize the district's students and their families to stormwater related topics and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants into the separate storm sewer system.

MISD and nested school districts Public Education Plan (PEP) have been developed and implemented jointly in a collaborative effort of the members of the Clinton River Watershed Council (CRWC) and Lake St. Clair Direct Drainage. According to the MS4 permit application, following 11 topics were assessed and prioritized based on requirements,

- A. Personal Watershed Stewardship
- B. Ultimate Stormwater Discharge Locations and Potential Impact
- C. Public Reporting of Illicit Discharges
- D. Procedure for Car, Pavement , and Power Washing
- E. Pesticides, Herbicides and Fertilizers Education
- F. Grass Clippings, Leaf Litter , and Animal wastes Disposal
- G. Waste Management Assistances
- H. Septic System Maintenance
- I. Benefits of Green Infrastructure and Low Impact Development (LID)
- J. Management of Riparian Lands
- K. Commercial, Industrial, and Institutional Education

Prioritization procedure for communities within the Clinton River East Sub-watershed (CREW), Red Run Drain (R2W) and Lake St. Clair Direct Drainage (LSCW) sub-watersheds are described in Appendix B - PEP. The Collaborative PEP approval letter from MDEQ is dated February 19, 2019 and Activities Detail Table 1 (revised February 4, 2019) are included in Appendix B.

Also MISD and nested school districts have pursued cooperative partnerships, plus information and resource sharing, with several organizations, including: Macomb County Public Works Office, Macomb County Health Department, Macomb County Department of Roads, Michigan Department of Environmental Quality (MDEQ), and Southeast Michigan Council of Governments (SEMCOG). Following types of tasks are conducted to maintain proper Public Education Program throughout the district,

- Display the Exhibit “Our Actions”- Seven Simple Steps to Clean Water
- Distribute Environmental Information Materials
- Post Environmental Information and links on Webpage:
- Distribute Newsletters with Environmental Articles and Tips
- Participate in regional planning efforts facilitated by the CRWC, county agencies, SEMCOG and other groups. (CRWC meetings attended by Consultant)
- Promote & participate in stewardship efforts coordinated by local organizations

Appendix D - Policy, Procedures and Regulations includes Policy S4 which describes the MISD and nested school district Public Education Plan (PEP).

Section VII.d – Illicit Discharge Elimination Program (IDEP)

Overview

The purpose of the IDEP section of the SWMP is to effectively eliminate illicit discharges (including the discharge of sanitary wastewater) into the separate stormwater drainage system that is under the School District’s jurisdiction. The MISD owns or operates known discharge points that outlet in Clinton Township, Sterling Heights, Macomb Township, Warren MS4s. As noted previously, maps detailing the School District’s MS4 facilities are available for viewing in electronic digital and/or hardcopy form by contacting the MISD’s Administration Division. Maps A-1 through A- 9 identify the MISD’s discharge points. Table 1 in Appendix A – Maps and Tables provides further information regarding these discharge points. By right of ownership, the School district maintains the authority to inspect, investigate, and monitor suspected illicit discharges to the district’s MS4, which is limited to facilities located on district owned and operated property within the urbanized area. The District’s IDEP program is detailed in Appendix C – IDEP.

Section VII.e – Construction Stormwater Runoff Control Program

Qualifying Local Soil Erosion & Sedimentation Control Programs

Each School District ensures that their own facilities avoid discharges of soil, sediment, or other pollutants such as pesticides, petroleum derivatives, construction chemicals, and solid wastes into their MS4. However the District tracks the receipt of complaints submitted by or to the individual nested school districts and any observed discharges.

Soil Erosion & Sedimentation Control for any development within the district is regulated by the MCPWO. Appendix D – Policy, Procedures and Regulations, Policy S3 describes the MISD and nested school districts' Construction Site Runoff Control Procedure including notification of the Part 91 Agency.

Construction Stormwater Runoff Control

School district construction or redevelopment projects are implemented in a manner such that runoff from the site is reduced to the greatest extent possible. Control measures utilized may include holding basins, diverting water through grassed swales, etc. Waste such as building materials, concrete washout, chemicals, litter, and sanitary waste is controlled to prevent infiltration into the MS4. Consideration is given to phasing projects to limit the amount of exposed soils. Interim soils stabilization methods such as temporary seeding, mulching, etc. may be utilized as applicable.

Trained inspectors visit construction project sites on a daily basis or as required under the SESC permit to enforce required Soil Erosion and Sedimentation Control measures ensuring that discharges into the MS4 do not occur. All contractors are provided with contact information for the district's inspectors. Should a soil, sediment, or pollutant discharge occur, the contractors are required to contact a School district's inspector notifying him/her of the event so that remedial action can be prescribed and implemented in an expedient manner. The MCPWO is the regulating authority.

The School District is the landowner or recorded easement holder in the case of its own construction projects and is cognizant of the State of Michigan Permit by Rule (Rule 323.2190).

Appendix D – Policy, Procedures and Regulations, Policy S3 describes the MISD and nested school districts' Construction Site Runoff Control Procedures.

Section VII.f – Post-Construction Stormwater Runoff Control for New Developments and Redevelopment

Regulatory Mechanism

The MISD has adopted Policy S5 as the standards applying to Post-Construction Stormwater Runoff Control for areas of new development and significant redevelopment at MISD and nested school districts owned facilities. In the event the District acquires or constructs new structural stormwater controls which discharge to county drains, the design of these structures will comply with the current Macomb County Standards. Enforcement of these standards is accomplished through site plan review by the school district, or its consultants, to ensure the appropriate standards are met.

Water Quality Treatment Performance Standard

According to Macomb County Stormwater Design Standards, MISD and nested School districts include water quality treatment volume standards for each new development or redevelopment of projects where the area of disturbance exceeds one acre as required by the EGLE NPDES phase II Stormwater Discharge Permit. The required standard is adopted by MISD and nested districts as Policy S5 included in Appendix D – Policy, Procedures and Regulations.

Channel Protection Performance Standard

Channel protection criteria was developed to prevent or minimize the channel enlargement process. The channel protection volume for 2 year storm must be stored and released over a period of at least 24 hours. The MISD adopted standard is included in Policy S5 in Appendix D – Policy, Procedures and Regulations.

Site Specific Requirements

Each site has its own special circumstances and conditions the following BMPs are used as appropriate according to the site conditions.

- Reduce runoff from the site to greatest extent possible
- Prevent spills and discharges
- Control waste such as building materials, concrete washout, chemicals, litter, and sanitary waste
- Phasing are 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 are trained in proper maintenance and operation of Soil Erosion and Silt Prevention measures.

As the MCPWO is the primary enforcing authority, all new development and redevelopment specifically those discharging to county drains must comply with the standards contained in the current MCPWO, Procedures and Design Standards for Stormwater Management. It has numerous rules and procedures addressing proposed projects in areas of soil or groundwater contamination and potential hotspots. There is no District owned land with areas of soil or groundwater contamination within the urbanized area. The MISD and nested School district does not expect to construct any facilities with the potential to be considered a hot spot during the term of the current permit. The MISD adopted standard is included as Policy S5 in Appendix D – Policy, Procedures and Regulations.

Long-Term Operation & Maintenance of BMPs

The MISD identify all stormwater controls and mechanisms for all new development or redevelopment projects where the area of disturbance exceeds one (1) or more acres by utilizing following information,

- Existing map of each facility identifying the location and type of structural controls, which are in Appendix A.
- Table 1 of MISD and nested school districts' facilities and Discharge Points, are included in Appendix A.
- The District's Stormwater Pollution Prevention Plan (SWPPP), and Standard Operation Procedures (SOPs) in Appendix E.

These show the existing discharge points and provide a listing of structural controls including a site diagram showing the location of each control, instructions for inspection and operation, and the inspection and/ or maintenance schedules for each control mechanism as standard operating procedures (SOPs) included in Appendix E – P2/GH and as adopted as Policy S5 in Appendix D – Policy, Procedures and Regulations.

- Stormwater runoff facilities, after construction and approval, shall be maintained in good condition, in accordance with the approved stormwater plan
- Update and revise the stormwater structural controls on facility site diagrams as identified during scheduled inspections or within 30 days following the completion a new facility or reconstruction/ redevelopment site project

The MCPWO is the regulating and enforcing authority for long-term maintenance of BMPs associated with all new developments and redevelopment projects within the MISD MS4 including projects which discharge to county drains. MCPWO, Procedures and Design Standards for Stormwater Management addresses maintenance covenants and plans.

Section VII.g – Pollution Prevention / Good Housekeeping for Municipal Operations

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. Listed below are the pollution Prevention & Good Housekeeping Program Objectives,

- Maintain an up-to-date inventory of owned facilities and stormwater structural controls.
- Procedure for updating and revising inventory of stormwater structural controls.
- Procedure for assessing each facility for the potential to discharge pollutants.
- Develop an SOP (SWPPP) for all facilities with a high potential for pollutant runoff.

- 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.
- Procedure for prioritizing of catch basins/manholes for maintenance and cleaning.
- Schedule for routine catch basin/manhole inspection, maintenance and cleaning.
- Provide the geographic location of stormwater structures.
- Procedure for dewatering, storage and disposal of materials extracted from storm sewer cleaning.
- Procedure for inspecting and maintaining storm water controls.
- Procedure for new structural controls to be designed and implemented in accordance with post- construction stormwater runoff control performance standards.
- Best management practices for operation and maintenance activities.
- Procedure for street sweeping.
- Procedure for pesticide application.
- Training.
- Contractor requirements and oversight.

Municipal Facility & Structural Stormwater Control Inventory

An inventory of the School district's owned and operated facilities appears in Appendix A, Table 1 and Maps.

Facility-Specific Stormwater Management

The District owned and operated facilities have been assessed for their potential to discharge pollutants to the waters of the State. Each facility has been evaluated based on the following criteria:

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

Based on these criteria, the potential for each facility to discharge pollutants to the waters of the State has been rated high, medium, or low. For low priority facilities where no assessment factors are present: catch basin cleaning, inspection of waste containers and street sweeping have been performed as indicated in the applicable procedures for these activities. For medium priority facilities, appropriate BMPs are considered and implemented based on the assessment factors present to prevent or minimize the potential for pollutants from entering surface waters of the State.

All the facilities with a high potential for pollutant runoff, have developed Stormwater Pollution Prevention Plans (SWPPPs) which are included in Appendix E – P2/GH.

Updating/revisions of maps and inventory are done within 30 days following adding/removing a facility or structural stormwater control. This inventory are updated within 30 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments are revised within 30 days prior to discharging stormwater at a new facility, or when there are changes in stored materials and for equipment, or vehicle changes at a facility.

The MISD's adopted Standard Operation Procedures (SOPs) are included in Appendix E – P2/GH.

Structural Stormwater Control Operation & Maintenance Activities

Appendix A, Table 1 lists the Structural Controls at each MISD and nested Districts owned and operated facilities (by District). The MISD maintains a total of 110 catch basins within their owned facilities.

Municipal Operation and Maintenance Activities:

The MISD owns the parking lots of their MS4. Repairs to parking lots or other municipal maintenance activities are done on an as needed basis by either the District Maintenance Department or a licensed contractor. A district representative is on site to oversee the work and ensure that left over material and other associated pollutants are disposed of, or stored properly at the Maintenance Yard. Coal-tar sealants are prohibited for use at MISD's facilities.

The District owned parking lots are assigned the same priority level and swept annually by using certified contractors. Collected materials are hauled away by a licensed contractor.

During cold weather operations the District applies road salt or sand to maintain safe walking and driving condition, as weather conditions dictate.

MISD's adopted SOPs are included in Appendix E – P2/GH.

The District conducted proper operation and maintenance activities in their owned and operated facilities. It includes maintenance of clean dry surface, regular pickup of waste materials, preventive maintenance on equipment, routine inspections for leaks or spills. Materials are

properly stored in the site. Employees are training on pollution prevention and good housekeeping activities.

The District will retain its associated records, in-house for a minimum of three years after termination of the permit. The records are available upon request by EGLE and shall include, but not be limited to:

- Information regarding the effectiveness of these activities;
- Records of analyses performed;
- Calibration and maintenance of instrumentation, if used; and
- Recordings from continuous monitoring instruction.

These records and supporting documents are retained by the District, and submitted to EGLE upon request.

Managing Vegetated Properties

MISD premises' pesticides use is controlled by Michigan certified contractors and in compliance with the adopted SOPs included in Appendix E – P2/GH.

Employee Training

Maintenance Staff have been trained on stormwater pollution prevention and good housekeeping at least once per permit cycle. New employees have been trained within the first year of employment. Employees have been trained using EGLE stormwater on-demand training videos that are found on their website and required topics are covered along with Monthly Safety Briefings. All topics related to stormwater pollution prevention/good housekeeping of municipal facilities and activities are covered during the training.

Contractor Requirements & Oversight

Contractors hired by the School Districts to perform municipal operation and maintenance are contractually required to comply with all pollution prevention and good housekeeping BMPs as are applicable to the activities performed. School District staff/inspectors are on-site daily to ensure contractual obligations have been met.

Section VII.h – Total Maximum Daily Load (TMDL) Implementation

A study or analysis that calculates the maximum amount of a pollutant that a water body can receive and still meet water quality standards. The TMDL establishes a pollutant budget and then allocates portions of the overall budget to the pollutant's sources.

Total Maximum Daily Loads (TMDLs) are developed by the states for water bodies that are not meeting water quality standards. TMDL development is required by "Section 303(d) of the federal Clean Water Act and the United States Environmental Protection Agency's (USEPA's) Water Quality Planning and Management Regulations (Title 40 of the Code of Federal Regulations [CFR],

Part 130)”. The TMDL process sets the allowable levels of pollutants for a body of water, and provides the states with a basis for determining the pollution reductions necessary to restore and maintain the quality of their water resources.

Escherichia coli (E. coli) is a type of bacteria (single cell organism) that is used by the State of Michigan as a water quality indicator. When E. coli is found in surface waters, it means that there has been fecal contamination. While E. coli itself may be harmful to human health, other disease causing organisms might also be present. Once these pathogens are in a stream or lake, they can infect humans through ingestion or skin contact, resulting in diseases such as gastroenteritis (diarrhea), giardia, hepatitis, or cholera.

For the water bodies impacted or potentially impacted by the MISD MS4, the following TMDL’s have been established:

E. coli Clinton River	-	TMDL	ID-91
E. coli Lake St. Clair and Metro Beach	-	TMDL	ID-72
E. coli Red Run Drain and Bear Creek	-	TMDL	ID-58

Sampling & Monitoring Procedure

The MISD and nested school districts IDEP and TMDL are detailed in Appendix C – IDEP and the scheduled tasks are included in Appendix F – Action Plan. The BMP’s provided in Appendix F, Action Plan provide for the MISD and nested districts to minimize the impact of the stormwater discharges from their MS4’s to the Maximum Extent Possible (MEP). The TMDL monitoring locations are listed in Table 1 in “Appendix A – Maps and Tables” and are displayed graphically on the maps provided in the appendix. The results of the sampling are assessed and summarized in the biennial progress report. Based on a review of the sampling results, BMP implementation is reviewed and BMPs may be updated or revised to ensure progress toward achieving TMDL pollutant load reductions.

Section VII.i. – Action Plan

Phase II communities are required to develop and implement a stormwater management plan with the following six minimum control measures:

1. **Public Education and Outreach** - Distributing educational materials and performing outreach to inform citizens about the impacts polluted stormwater runoff discharges can have on water quality.
2. **Public Involvement and Participation** - Providing opportunities for citizens to participate in program development, implementation, and review, including effectively publicizing public hearings or participation.
3. **Illicit Discharge Detection and Elimination** - Developing and implementing a plan to detect and eliminate illicit discharges to the storm drain system including illicit connections and illegal dumping.
4. **Construction Site Runoff Control** - Developing, implementing, and enforcing an erosion and sediment control program for construction activities that disturb one or more acres of land.
5. **Pollution Prevention / Good Housekeeping for Municipal Operations** - Developing and implementing a program to prevent or reduce pollutant runoff from municipal operations. (This is a primary focus of this handbook.)
6. **Post-Construction Stormwater Management in New Development and Redevelopment** - Developing, implementing, and enforcing a program to address discharges of stormwater runoff from new and redevelopment areas.

The action plan in “Appendix F – Action Plan” summarizes the implementation activities necessary to meet these measures.