



Stormwater Management Program (SWMP)

Effective upon permit issuance for a period of 5 years

Permittee: Washtenaw County MS4

Mailing Address: 705 N. Zeeb Rd, Ann Arbor, MI 48107

Contact Person: Evan N. Pratt

Washtenaw County

Title: Water Resources Commissioner

Telephone Number: 734-222-6860

Date: May 2013; revised 8/14, 11/16

**Signature of Authorized
Permittee
Representative:**

Handwritten signature of Evan N. Pratt in black ink.

Evan N. Pratt, P.E.
Washtenaw County Water
Resources Commissioner

Handwritten signature of Greg Dill in black ink.

Greg Dill
Washtenaw County Administrator

Common Abbreviations

WCWRC: Washtenaw County Water Resources Commissioner's Office, CPCS: Community Partners for Clean Streams, HRWC: Huron River Watershed Council, MHI: Middle Huron Initiative, SAG: Stormwater Advisory Group, WCEH: Washtenaw County Environmental Health

Stormwater Management Program (SWMP) Narrative

I. Introduction

In 1999 the EPA established the National Pollutant Discharge Elimination System (NPDES) Phase II regulations to reduce the impact of stormwater pollution that was being created by increased development and to preserve, protect and improve the water resources. As part of this program Washtenaw County was required to apply to the State of Michigan Department of Environmental Quality (MDEQ) for coverage of stormwater discharges from municipal separate storm sewer systems (MS4s) in regulated urbanized areas.

This document fulfills Washtenaw County's NPDES Phase II stormwater permit requirement for a Stormwater Management Program (SWMP). This SWMP has been designed and will be implemented to reduce, to the maximum extent practicable, the discharge of stormwater pollutants to surface waters in regulated county drains and county-owned property within regulated areas in Washtenaw County. The Washtenaw County Water Resources Commissioner's Office administers the NPDES MS4 permit on behalf of Washtenaw County. The SWMP addresses the six minimum measures identified in the Permit:

- Public Participation/Involvement Program (PPP)
- Public Education Program (PEP)
- Illicit Discharge Elimination Program (IDEP)
- Construction Stormwater Runoff Control (CSW)
- Post-Construction Stormwater Runoff Control (PCSW)
- Pollution Prevention & Good Housekeeping for Municipal Operations (P2/GH)

II. REGULATED MS4 AREA

Washtenaw County has requested stormwater permit coverage for enclosed portions of County Drains and County-owned properties within the regulated Urbanized Area (UA) (circa 2000) that meet the definition of MS4s. Maps of the Urbanized Areas within Washtenaw County are included in Appendix B. Descriptions of the regulated County properties are described in Appendix J. Washtenaw County will incorporate the 2010 Urbanized Area within 1 year from permit issuance.

III. OUTFALLS & POINTS OF DISCHARGE

A listing of the County's outfalls and points of discharge within the regulated urbanized area are provided in Appendix C.

IV. NESTED JURISDICTIONS

No nested jurisdictions are claimed as part of Washtenaw County's Phase II MS4 Stormwater Permit.

This SWMP relies on the implementation of stormwater management activities performed by Washtenaw County, our other partner local governments, watershed councils and other agencies to protect and restore the surface waters in watersheds within the County. Further, Washtenaw County recognizes that by working collectively with local governments, agencies, and other watershed partners, Total Maximum Daily Load (TMDL) limits, illicit discharge elimination, public education and other water management activities can be implemented more efficiently and cost-effectively. Given these cooperative efforts, the HRWC has provided language for various sections of this SWMP, including portions of the public participation plan,

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illicit discharge elimination program, public education program and total maximum daily load (TMDL).

V. ENFORCEMENT RESPONSE PROCEDURE

Washtenaw County has reviewed its charter, ordinances and other existing authority and has provided the mechanisms identified below to support its commitments and implement the practices and programs specified in this SWMP. Violations of the County's ordinances or regulatory mechanisms are expected to be dealt with in accordance with the processes identified within the ordinance or regulatory mechanism, including stated notices, citations and/or fines. The regulatory mechanisms referenced below are provided in Appendix D, unless otherwise noted.

- *The Michigan Drain Code of 1956 (Act 40 of 1956)*
- *Rules of the Washtenaw County Water Resource Commissioner (Appendix I)*
- *Regulation for the Inspection of Residential Onsite Water and Sewage Disposal Systems at the Time of Property Transfer*
- *Regulation for the Onsite Management, Treatment and Disposal of Wastewater*
- *Regulation for Privately Owned Community Sewage Systems*
- *Regulation for Roadside Dumping and Litter Control*
- *Pollution Prevention Regulation*
- *Regulation for Cleanup of Environmental Incidents*
- *Soil Erosion and Sedimentation Control Ordinance*

Should Washtenaw County determine that the existing authority is inadequate to implement the requirements of the stormwater permit, the County will notify the MDEQ. That notification will include those actions taken or proposed by Washtenaw County to secure the legal authority to meet the permit requirements or any appropriate explanation as to why such authority cannot be obtained.

The WCWRC's Office will track instances of non-compliance as required under the permit including:

- Name
- Date
- Location of violation (address, cross-streets, etc.)
- Business/Agency/Organization (as applicable)
- Description of the violation
- Description of Enforcement Response
- Schedule for returning to compliance
- Date the violation was resolved/closed.

VI. PUBLIC INVOLVEMENT/PARTICIPATION PLAN (PPP)

The Washtenaw County stormwater management program will strive to inform the public about the County's commitment to water quality improvement and encourage public involvement in review of the stormwater program. The Public Participation Plan is provided in Appendix E and identifies actions that will be taken to facilitate the involvement of watershed

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jurisdictions, agencies, organizations, and the general public as required as part of the MS4 permit. The plan includes the following elements:

- Public notice
- Access to the stormwater management plan
- Stormwater Advisory Group (Watershed group), and
- Stormwater Management Program (SWMP) review.

Stormwater Advisory Group (SAG)

In 2008, the permittees within the Middle Huron River Watershed formed the Middle Huron Stormwater Advisory Group (SAG). This is a forum, open to the public, for planning, discussion and reporting on stormwater treatment and management practices. Future SAG meetings will be posted on the Huron River Watershed Council's website and/or via their e-mail distribution lists. Meeting agendas and lists of attendees to the meetings can be obtained by request from Ric Lawson the SAG facilitator (rlawson@hrwc.org, 734-769-5123 ext.609).

Participation in Watershed Groups

WCWRC will also actively participate in watershed groups throughout the County (e.g., Huron River Watershed Council, Alliance of Rouge Communities, etc). The number of meetings attended will be tracked during the permit term.

Review and Revision of the Stormwater Management Program

The SWMP was completed as part of the NPDES application process. The draft SWMP will be made available as part of the public comment period of the NPDES draft permit review process. At that time, public notice of the availability of the SWMP will be made and any comments received will be reviewed. The SWMP will be also be available to the public via the Huron River Watershed Council's (HRWC) website at <http://www.hrwc.org/>. If additional revisions to the SWMP are proposed during the permit term, public notice and comment processes will be followed as described in the PPP in Appendix E.

VII. PUBLIC EDUCATION PLAN (PEP)

The purpose of the PEP is to encourage the public within Washtenaw County to reduce the discharge of pollutants in stormwater to the maximum extent practicable. A collaborative PEP was prepared by the Huron River Watershed Council for SAG permittees and is included as Appendix F. The PEP plan combines with and relies upon on the implementation of public education activities by partner communities and agencies and addresses all the required public education elements and audiences as defined in the permit application.

The Washtenaw County Public Education Plan (PEP) includes the continuation of programs that promote, publicize, and facilitate watershed education and stress citizen's role and responsibility to protect local waterways, as described in Appendix F. Washtenaw County will implement the following PEP activities:

PEP Activity Number

1. Distribute Informational Materials
2. Watershed Community Calendar
3. Information in Community Newsletters and on Websites - Educational Content
4. Local Newspaper and Web/Other Advertisements

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5. Promote Water Resource Protection Workshops
6. Volunteer Stream Monitoring
7. Catchbasin/Storm Drain Labeling
8. Riparian Land Management Information
9. Displays and Outreach at Local and Regional Fairs and Community Events
10. Promote County-wide Compliant Tracking and Response System
11. N/A to Washtenaw County; Livingston County Household Hazardous Waste Program
12. N/A to Washtenaw County; Livingston County Prescription Drugs Disposal Program
13. N/A to Washtenaw County; Livingston County Electronic Waste Reduction Program
14. Stream and River Crossing Road Signs
15. Washtenaw County Community Partners for Clean Streams
16. Washtenaw County Pollution Prevention Inspections
17. Washtenaw County Issues of the Environment Radio Show
18. Washtenaw County Environmental Excellence Awards
19. Washtenaw County Fats, Oil and Grease & Litter Reduction
20. Washtenaw County River Safe Homes Program
21. Washtenaw County & City of Ann Arbor Residential Rain Garden Program
22. Washtenaw County Home Toxics Reduction Program
23. Washtenaw County Drug Take Back Program

VIII. ILLICIT DISCHARGE ELIMINATION PLAN

IDEP section of our SWMP was developed to prohibit and effectively eliminate illicit discharges and illicit connections (including the discharge of sanitary wastewater) to regulated Washtenaw County storm systems. IDEP activities will be carried out to address the required elements identified in the application.

“Illicit Connection” means a physical connection to the separate stormwater drainage system that 1) primarily conveys non-stormwater discharges (excluding uncontaminated groundwater) into the system and/or 2) is not authorized or permitted by the local authority (where a local authority requires such authorization or permit).

An “Illicit Discharge” means any discharge (or seepage) to the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater. Examples of illicit discharges include dumping of motor vehicle fluids, household hazardous wastes, grass clippings, leaf litter, or animal wastes, or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-stormwater waste into a separate stormwater drainage system.

Storm Sewer System Map

An updated version of our storm sewer system map is online and can be found <http://gisapp.ewashtenaw.org/mapwashtenaw/>. Through our Geographical Information Systems (GIS) & Information Technology Department, Washtenaw County provides MapWashtenaw, which is an interactive, online mapping tool that allows access to the latest parcel maps and property data. A variety of county-wide information is available including parcels, aerial photos, topography, schools and natural features.

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Illicit Discharge Identification and Investigation

Dry Weather Screening Program & Data Collection

IDEP field observations will be performed at regulated outfalls throughout the regulated MS4 area over a 5 year term. The goal is to screen approximately 20% of the regulated outfalls per year.

All outfall field observations for IDEP will include a record of presence/absence of flow, water clarity, deposits/stains on the discharge structure or bank, color, odor, vegetation condition, floatable materials, structural condition and biology (such as bacterial sheens, algae and slimes). Outfalls with no flow, minimal flow, or those that do not exhibit other signs of a potential illicit discharge during field observation are not sampled. See Appendix G for IDEP procedures.

A Memorandum of Understanding for the Cooperative Illicit Discharge Elimination Program has been drafted to provide a mechanism for notification of the upstream jurisdiction if an illicit discharge is tracked outside of the jurisdictional boundary of the downstream MS4. The draft memorandum is included in Appendix G.

Illegal Dumping/Spills

Washtenaw County's Environmental Response Procedure addresses responses to illegal dumping/spill incidents within the County. See Appendix G.

Time of Sale & Field Inspections

Washtenaw County's field inspections and time of sale (TOS) septic inspection and correction programs work to minimize and/or eliminate infiltration of sanitary sewer and septic systems into County drains. WCWRC Field Inspection Division notes identification and location of any sanitary sewer infiltration into County drains during drain inspections. WCEH's TOS program inspections are performed on well and septic systems county-wide by the Washtenaw County Environmental Health Division per the Regulation for Onsite Well and Sewage Disposal System Inspection at the Time of Property Transfer (see Appendix D). In order to comply with the time of sale requirements, homes which are found to be in an unacceptable condition must take corrective action before WCEH will issue a time of sale authorization letter. Field inspection and TOS records of failing or infiltrating septic and sanitary sewers are kept at the Western Service Center.

Pollution Prevention (P2) Program

Washtenaw County's Pollution Prevention Program inspects facilities that store, manufacture, or use hazardous, toxic or polluting materials (5 gallons or greater). Inspectors ensure that facilities utilize and dispose of hazardous materials properly, thereby preventing environmental contamination. This program operates in accordance with Washtenaw County's Pollution Prevention Regulation (Appendix D). The WCWRC's Office will maintain an estimate of the number of facilities inspected during the permit term.

IDEP Training & Evaluation

Staff Training

All relevant Washtenaw County employees in the Water Resources Commissioner's Office will complete IDEP training during the permit term. Any new WCWRC employees involved in the IDEP program will complete IDEP training within one year of their date of hire. In addition,

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Washtenaw County will host an Illicit Discharge Elimination Program workshop once during the permit cycle in conjunction with the Southeast Michigan Regional IDEP Work Group and SEMCOG. The draft regional IDEP training schedule is included in Appendix G. Training records will be kept at WCWRC for employees requiring IDEP training.

Program for Determining Overall Effectiveness of IDEP Program

Refer to each IDEP program element/activity for evaluation of IDEP program effectiveness. Records, maps and IDEP tracking database are on record with the Water Resources Commissioner's Office and can be made available upon request.

Illicit Discharge Ordinances

Prohibiting Non-Stormwater Discharges & pollutants into the MS4

Discharges into Washtenaw County's drains are primarily governed by the Michigan Drain Code, Public Act 40 of 1956. This Act prohibits discharge of sewage, or various waste materials detrimental to drains, or pollution of the waters of the state receiving flow from the drains that can, "injure livestock, destroy fish life, or be injurious to public health." See Appendix D for a copy of the Drain Code. The Code does allow for discharges that are not detrimental (as identified above), and those that comply with Part 31. This should allow for the discharge of flows from the following other non-stormwater discharges, unless they are identified as a "significant contributor" of pollutants to the MS4:

- Fire fighting activities
- Water line flushing and discharges from potable water sources
- Landscape irrigation runoff, lawn watering runoff and irrigation waters
- Diverted stream flows and flows from riparian habitats and wetlands
- Rising groundwaters and springs
- Uncontaminated groundwater infiltration and seepage
- Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits
- Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
- Air conditioning condensate
- Waters from noncommercial car washing
- Street wash water
- Dechlorinated swimming pool water from single, two, or three family residences. (A swimming pool operated by the permittee shall not be discharged to a separate storm sewer or to surface waters of the state without NPDES permit authorization from the MDEQ)

Environmental Complaint Response

IDEP Tracking Database

A database is kept on file which documents all complaints received and the associated follow-up. As appropriate, the database also tracks field investigation reports, investigation outcome, outfall testing results and enforcement taken. In most cases the County works as a liaison with other municipalities to help and assist with the resolution of illicit discharges.

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Environmental Reporting Line

The County Environmental Reporting Line is a county-wide public reporting and response system for illicit discharges or improper disposal of materials into local storm drain systems. The Environmental Reporting telephone line (734-222-3800) is in operation during business hours (Monday-Friday, 8:30 to 5:00) and is staffed by the Washtenaw County Environmental Health Department. For additional information see Appendix F – Activity #10.

Dye Testing

Washtenaw County is requesting authorization to conduct dye testing as part of its MS4 permit in lieu of securing annual authorization from MDEQ. Dye testing supports the County's Illicit Discharge Elimination Program, and the proposed notification and dye usage procedures remain unchanged from those submitted to MDEQ in 2013. The County's dye testing procedures are provided in Appendix L. The County is requesting authorization to dye test for the duration of the MS4 permit.

IX. CONSTRUCTION STORMWATER RUNOFF CONTROL

In order to control wet weather discharges from construction activities, Washtenaw County has developed procedures and programs to: minimize soil erosion and control runoff from construction sites, ensure that appropriate soil erosion and sedimentation controls are included on site plans, and a process for receiving public notification of discharges from construction activities. The purpose of Washtenaw County's SESC Program is to manage soil erosion and subsequent sedimentation in order to promote the safety, public health and general welfare of the community through effectively sustaining the goal of clean water in Washtenaw County and the State of Michigan.

Soil Erosion and Sedimentation Control (SESC) Programs

Washtenaw County is mandated by the Michigan Department of Environmental Quality to administer and enforce the soil erosion and sedimentation control requirements under Part 91 of the Natural Resources and Environmental Protection Act, Act 451 of the Public Acts of 1994. The Washtenaw County Board of Commissioner has adopted the aforementioned Act and rules promulgated under the Act within the County's SESC Ordinance. The County administers the SESC program to the following twelve jurisdictions: Augusta Township, Village of Dexter, Lodi Township, Northfield Township, Salem Township, City of Saline, Saline Township, Scio Township, Superior Township, Webster Township, York Township, and Ypsilanti City. In addition to the WCWRC's County Enforcing Agency (CEA) status, the County is also an Authorized Public Agency (APA) for SESC program management on County projects.

The County's SESC programs ensure that construction activity one acre or greater in total earth disturbance, with the potential to discharge into the MS4, obtains a SESC permit or is conducted by an APA/MEA. The Washtenaw County Soil Erosion and Sedimentation Control Ordinance is provided in Appendix D. The APA Procedures Manuals are provided in Appendix H. The number of SESC permits issued during the permit term will be tracked. Additional information on the SESC program including forms, guidance, permit fee schedules, etc. can be found online at: http://www.ewashtenaw.org/government/drain_commissioner/dc_websoilerosion

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Notifications - Soil or sediment discharge to the MS4 from a construction activity

WCWRC will track the receipt of complaints of soil or sediment discharge from construction activity to the MS4 received from the public or noted by staff during the regular course of business as described in the Construction Stormwater Runoff Control Program – Notification Procedure included in Appendix H.

Notifications - Discharge of other polluting material to the MS4 from a construction activity

The County will notify the MDEQ district office or the Pollutant Emergency Alert System (PEAS) hotline of the discharge of other polluting materials, in excess of the MI Part 5 threshold reporting quantity, into the County's MS4 from a construction activity in accordance with the Washtenaw County Environmental Response Procedure included in Appendix H.

State of Michigan – Permit-by-Rule Notification

In addition, SESC applicants/permittees will be advised of the State of Michigan Permit-by-Rule, in the Soil Erosion Permit Application, SESC permit and/or on the SESC website.

X. POST-CONSTRUCTION STORMWATER RUNOFF CONTROL FOR NEW DEVELOPMENTS & REDEVELOPMENT

Washtenaw County WRC has a process to implement and enforce a program to address post-construction stormwater runoff from all new and redevelopment projects that disturb 1 acre or more under its jurisdiction. All plats recorded with the Register of Deeds must conform to Act 288 of the Public Acts of 1967, as amended. Under this Act, the Water Resources Commissioner is responsible for ensuring that the drainage or storm water management system is adequate for the development, and for protecting downstream landowners and resources. The procedures, standards and recommendations set forth in the Rules of the Water Resources Commissioner are designed for these purposes.

The general standards set forth in the Rules of the Water Resources Commissioner will also be applied by the Washtenaw County Water Resources Commissioner in the review of the following:

1. Site Condominium plans prepared under Act 59, P.A. 1978, as amended, where local government ordinances require.
2. Mobile home plans prepared under Act 96, P.A. 1987.
3. Applications for permits to discharge to a county drain under P.A. 40 of 1956, as amended.
4. Review of storm water system plans in other classes of developments or redevelopments, when requested by local governments.

Regulate Post Construction Controls at New Development & Redevelopment Sites

Rules of the Washtenaw County Water Resource Commissioner (Rules)

The *Rules of the Washtenaw County Water Resource Commissioner* outline procedures and design criteria for stream channel protection, stormwater quality management, flood control, detention pond design and other best management practices. All site plans are reviewed to ensure that they are in compliance with the Rules. Plans cannot be approved without meeting the standards.

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The *Rules* can be found on the WCWRC's Office website at:

http://www.ewashtenaw.org/government/drain_commissioner/dc_webPermits_DesignStandards/dc_summary.html. A copy of the *Rules* has also been provided in Appendix I. The current version of the *Rules* was issued in August 2014 and was revised on October 17, 2016.

Post Construction Controls at County-owned Facilities

All property owned by Washtenaw County with new development or substantial redevelopment will adhere to the *WCWRC Rules*. Copies of the site plan reviews and approvals will be kept on file. Locations with water quality devices (e.g. swirl concentrators or other pretreatment measures) will be noted and maintained per manufacturer's recommendations.

XI. POLLUTION PREVENTION AND GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

Washtenaw County will implement a set of pollution prevention Best Management Practices (BMPs) for MS4 municipal operations, maintenance and training activities to control pollution from municipal operations to the maximum extent practicable, as required for municipal facilities and operations regulated under the MS4 permit.

Municipal Facility & Structural Stormwater Control Inventory

An inventory of County-owned or operated facilities within the MS4 regulated area with a discharge to surface waters of the state is included in Appendix J along with an estimate of the number of structural stormwater controls per category identified in the application.

Regulated Municipal Facility Map(s)

Maps with the location of regulated facilities and their stormwater structural controls are available at the following locations: Washtenaw County Western Service Center and/or Facilities Management.

Municipal Facility & Structural Stormwater Control Inventory Updates

The inventory of regulated facilities will be reviewed at least annually, by the WCWRC, and updated as needed, to reflect facilities and/or stormwater structural controls that are added, removed or no longer owned by Washtenaw County. If changes are warranted, maps of the impacted facilities will be created and/or updated, as appropriate, within 60 days of the completion of the annual facility inventory review.

Regulated Municipal Facility – Assessment of Potential for Pollutant Discharge

Each regulated WC facility was prioritized based on having high, medium, or low potential to discharge pollutants to surface waters of the state. The Municipal Facility Inventory & Assessment Procedure is included in Appendix J and includes a listing of regulated County buildings. As required in the application, fleet maintenance and storage yards shall reflect "high" potential for pollutant runoff unless documentation of how the facility has low potential is provided. The assessment will be reviewed at least annually (by the WCWRC) and updated, as appropriate. If changes are warranted, the assessment will be updated within 60 days of completion of the annual review.

Regulated Municipal Facilities with High Potential for Pollutant Runoff

Washtenaw County does not currently have any facilities identified as having "high" potential for discharge of pollutants. If the County determines any facilities are in the "high" category, the

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structural and non-structural stormwater controls utilized to prevent or reduce pollutant runoff at each “high” potential facility will be included in a Stormwater Pollution Prevention Plan(s) developed for the specific facility, and a copy of the SWPPP will be available at the facility.

The SWPPP includes:

- List of significant materials stored on-site that could pollute stormwater
- Description of handling & storage requirements for each significant material
- Description of the potential to discharge the significant material
- List of good housekeeping practices implemented at the site
- Description and schedule for routine maintenance and inspections of stormwater management and control devices
- Description and schedule for conducting comprehensive site inspections at least semi-annually, including an inspection of all structural stormwater controls and a review of non-structural stormwater controls to prevent or reduce pollutant runoff.

Regulated Municipal Facilities with Medium or Low Potential for Pollutant Runoff

The Municipal Facility Inventory & Assessment Procedure is included in Appendix J and includes BMPs utilized at regulated facilities with medium or low potential for the discharge of pollutants to surface waters of the state. The facilities will choose some or all of these BMPs as appropriate to their facility’s staffing, budget and facility usage characteristics.

Structural Stormwater Control Operation and Maintenance Activities

The Structural Stormwater Control Operation & Maintenance Activity Procedure is included in Appendix J. The procedure includes routine inspection, maintenance and cleaning frequencies based on the priority level assigned. The list will be reviewed at least annually and updated, as appropriate, based on citizen complaints and inspection findings. Any updates to the procedure will be completed within 60 days of completion of the annual review.

Structural Stormwater Control Effectiveness

The Structural Stormwater Control Operation & Maintenance Activity Procedure is included in Appendix J. The procedure addresses routine inspection, maintenance and cleaning frequencies for catch basins and other structural stormwater controls. The procedure will be reviewed at annually and updated, as appropriate, based on citizen complaints and inspection findings. The list will be updated within 60 days of completion of the annual review.

Maps and/or descriptions of regulated catch basins locations are available at the following location: Washtenaw County Western Service Center and/or Facilities Management. In addition, new structural stormwater controls meet the WCWRC’s “Rules” and will be added periodically to the GIS mapping system.

Proper Handling & Disposal of Operation and Maintenance Waste

Catch basins and other structural stormwater controls may be maintained using a vactor truck. A vactor truck dewatering/disposal program has been established. The WCWRC’s Office - Field Inspection Division coordinates disposal and dewatering of vactor waste at the City of Ann Arbor’s W.R. Wheeler Service Center. The usage of the vactor equipment is tracked using an hourly format. Vactor debris is decanted at the Wheeler Center and sent for landfill.

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Employee/Contractor Training

Training is an ongoing effort throughout the County. General training is provided to all applicable employees regarding the County stormwater program, good housekeeping procedures and pollution prevention via the County's websites. Presentations are made, upon request, to employee groups within the County. The number of presentations will be tracked during the permit term.

Contractor & Vendor Training information is available on the eWashtenaw website. Contractors/vendors are required to comply with the WCWRC's Office *Rules* which outlines stormwater BMP requirements. Contracts are signed by the vendor and kept on file. In addition, Facilities Management is including stormwater training requirements in their contract language for vendors.

Staff Certifications

Certain job-specific certifications are held by necessary employees. SESC, Construction Stormwater and Industrial Stormwater certifications are kept on record at the WCWRC.

IDEP Training

All relevant Washtenaw County employees in the Water Resources Commissioner's Office will complete IDEP training once during the permit term. See Section VIII - IDEP for additional information.

Water Resources Commissioners Field Inspection Division Apprenticeship Program

The purpose of the Field Inspection Division Apprenticeship Program is to establish and maintain high work standards through the development of apprentices who have a complete knowledge of the technical and theoretical aspects of their trades. Successful completion of various training programs and educational course work is one component of this apprenticeship program. The other is on-the-job training in all areas of their trade. All Field Inspection personnel have completed or are currently completing the required curriculum.

Parking Lot Maintenance

Parking lot sweeping is contracted on an as needed basis. For example, Meri Lou Murray Recreation Center, County Farm Park and Parks and Recreation Field Operations Building lots are swept prior to being resealed. Manual removal of debris from catch basins is performed each service day during exterior facility reviews.

Salt and ice melt are purchased pre-bagged, stored indoors and applied sparingly. Parking lot snow removal is a contracted service.

The County does not own any bridges or roads.

Management of County-owned Vegetated Properties

All relevant staff and contractors are trained and certified applicators if using pesticides, herbicides and/or fertilizers as a function of their job responsibilities. Selected Parks and Recreation employees are licensed for the application of pesticides and herbicides. Employee training records are kept at the County offices.

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Washtenaw County does not currently fertilize at any parks or County-owned property. The only exception being Pierce Lake Golf Course which applies fertilizer only after soil testing and based on the amounts recommended per the soil analysis. Any future application at any site other than new lawn establishment will require a soil test.

XII. Total Maximum Daily Load Limits

The permit requires that permittees identify and prioritize actions to reduce pollutants in stormwater discharges from MS4s to impaired waters, to meet Water Quality Standards. The impairments listed below in Table 2 were identified by MDEQ in Washtenaw County's application notice:

Table 2: Waterbodies requiring TMDLs for Stormwater-Related Impairments:

Waterbody	Pollutant of Concern	TMDL Status	Location/Area
Ford Lake/ Belleville Lake	Phosphorus	Approved in 2000	Impoundments of the Huron River located between the cities of Ypsilanti and Romulus.
Geddes Pond	<i>E. coli</i>	Approved in 2001	Geddes Pond Dam upstream to Argo Dam, Ann Arbor
Honey Creek	<i>E. coli</i>	Approved in 2009	Confluence of Huron River upstream to Wagner Rd.
Malletts Creek	Biota (Flow, Sedimentation/Siltation)	Approved in 2004	Huron River confluence u/s to Packard Rd.
Paint Creek	Biota (Flow, Sedimentation/Siltation), Dissolved Oxygen, <i>E.coli</i>	Approved in 2009	4.6 miles of stream in Ypsilanti
Rouge River	Biota (Flow, Sedimentation/Siltation), <i>E. coli</i>	Approved in 2007	Rouge River Watershed
Swift Run Creek	Biota (Flow, Sedimentation/Siltation)	Approved in 2004	SE Ann Arbor: Huron River confluence upstream to Ellsworth Rd

Common Abbreviations

WCWRC: Washtenaw County Water Resources Commissioner's Office, CPCS: Community Partners for Clean Streams, HRWC: Huron River Watershed Council, MHI: Middle Huron Initiative, SAG: Stormwater Advisory Group, WCEH: Washtenaw County Environmental Health

Specific watershed goal differences are:

- The Middle I and Lower I Rouge River watersheds have separate Watershed Management Plans composed and funded by the Alliance of Rouge Communities of which Washtenaw County is an active participant.
- In addition to the Middle Huron Watershed, monitoring is conducted in the Rouge River Middle and Lower I sub-watersheds. Monitoring activities are conducted by the Alliance of Rouge Communities. Dry weather screening in the regulated portions of the Middle I and Lower I is conducted by the Washtenaw County Water Resources Commissioner's Office.

BMPs in support of TMDLs

Washtenaw County's Stormwater Management Program (SWMP) includes priority actions in support of achieving the pollutant load reduction requirements for each TMDL. BMP selection, review and revision is incorporated into the SWMP process along with periodic reporting to MDEQ. A list of SWMP actions which will be implemented during the permit cycle to make progress toward achieving pollutant load reductions for each TMDL is included in Appendix K.

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