

**Rochester Community Schools  
Stormwater Management Program Plan**

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

**PERMIT NO. MI0060149**

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# Stormwater Management Program Plan

## 1.0 Introduction

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

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

Rochester Community Schools owns and operates twenty-four (24) public properties within the boundaries of the “Detroit Urbanized Area”. All Rochester Community Schools properties are within the urbanized area based off of the 2010 Census data, and the facilities include:

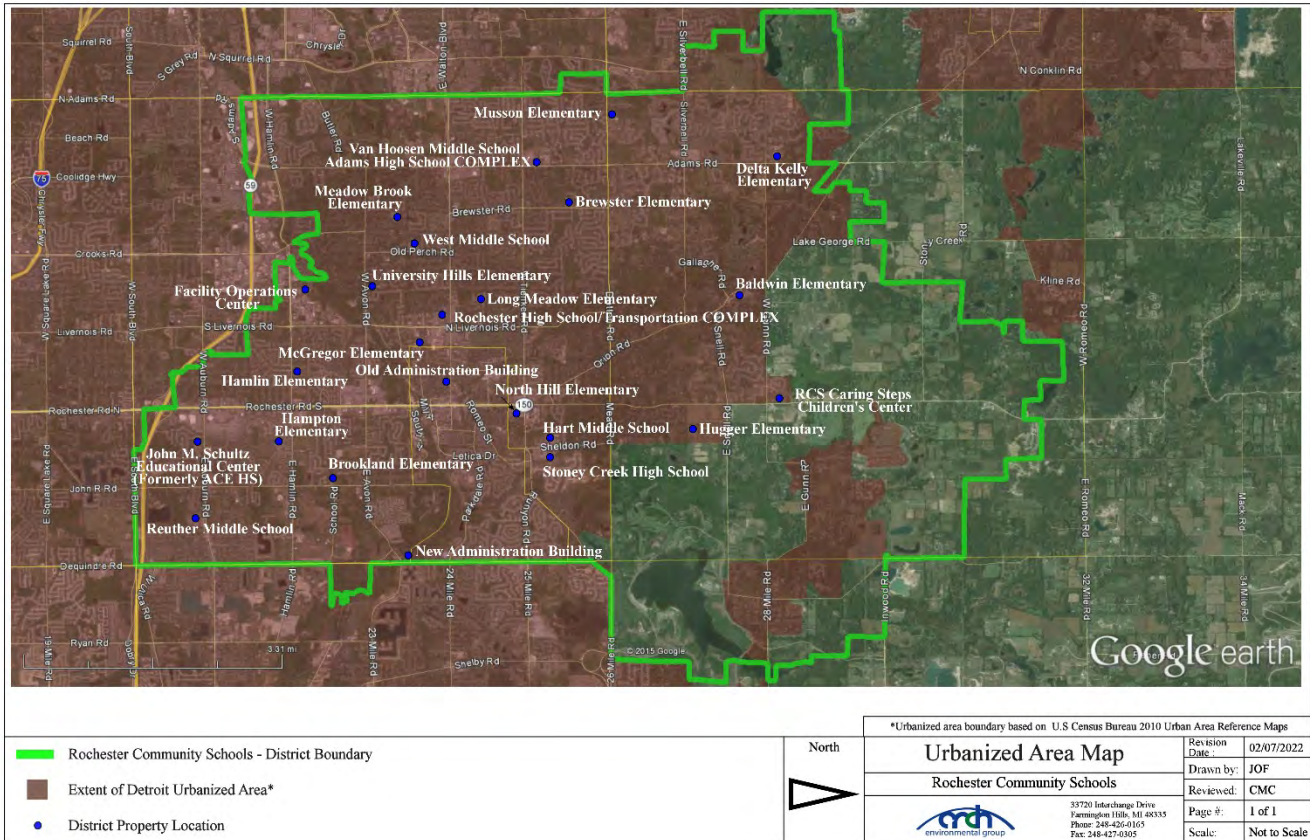
1. **Adams High School** (3200 W. Tienken Road, Rochester Hills, MI 48306) / **Van Hoosen Middle School** (1339 Adams Road, Rochester Hills, MI 48306) **COMPLEX**
2. **New Administration Building** (52585 Dequindre Road, Rochester Hills, MI 48307)
3. **Old Administration Building** (501 University Drive, Rochester, MI 48307)
4. **Baldwin Elementary School** (4325 Bannister Road, Rochester, MI 48306)
5. **Brewster Elementary School** (1535 Brewster Road, Rochester Hills, MI 48306)
6. **Brooklands Elementary School / Race Adult Education Building** (490 E. Auburn Road, Rochester Hills, MI 48307)
7. **Caring Steps Children’s Center** (3838 Rochester Rd, Rochester, MI 48306)
8. **Delta Kelly Elementary School** (3880 Adams Road, Oakland Charter Township, MI 48363)
9. **Facility Operations Center (FOC)** (1402 W. Hamlin Road, Rochester Hills, MI 48309)
10. **Hamlin Elementary School** (270 W. Hamlin Road, Rochester Hills, MI 48307)
11. **Hampton Elementary School** (530 Hampton Circle, Rochester Hills, MI 48307)
12. **Hart Middle School** (6500 Sheldon Road, Rochester Hills, MI 48306)
13. **Hugger Elementary School** (5050 Sheldon Road, Rochester, MI 48306)
14. **John M. Schultz Education Center (formerly A.C.E. High School (Alternative Center for Education))** (1440 John R Road, Rochester, MI 48307)
15. **Long Meadow Elementary School** (450 Allston Drive, Rochester Hills, MI 48309)
16. **McGregor Elementary School** (1101 1<sup>st</sup> Street, Rochester, MI 48307)
17. **Meadow Brook Elementary School** (2350 Munster Road, Rochester Hills, MI 48309)
18. **Musson Elementary School** (3500 Dutton Road, Rochester Hills, MI 48306)
19. **North Hill Elementary School** (1385 Mahaffy Avenue, Rochester MI 48307)
20. **Reuther Middle School** (1430 East Auburn Road, Rochester Hills, MI 48307)
21. **Rochester High School** (1361 Walton Blvd, Rochester Hills, MI 48309) / **Transportation** (380 S. Livernois Road, Rochester Hills, MI 48309) **COMPLEX**
22. **Stoney Creek High School** (6755 Sheldon Road, Rochester Hills, MI 48306)
23. **University Hills Elementary School** (600 Croydon Road, Rochester Hills, MI 48309)
24. **West Middle School** (500 Old Perch Road, Rochester Hills, MI 48309)



**1.1 Regulated Area**

A map identifying the urbanized area within the Rochester Community Schools urbanized area as defined by the 2010 Census is provided below in Map 1.

**Map 1 – District Jurisdictional Boundary Map – Urbanized Area<sup>1</sup>**



<sup>1</sup> Urbanized area boundary based on U.S. Census Bureau 2010 Urban Area Reference Maps.

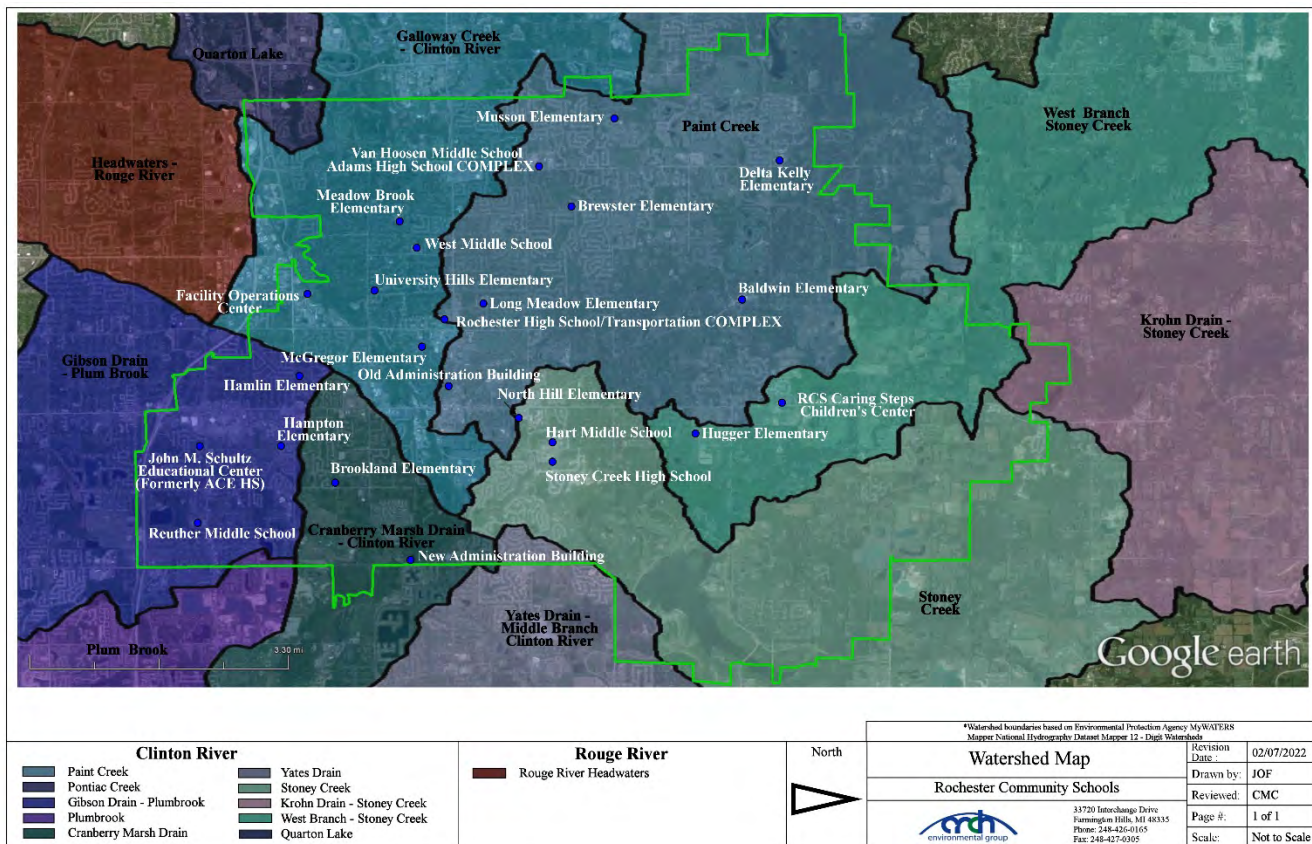
## 1.2 Outfalls & Discharge Points/ Receiving Waters

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

Rochester Community Schools has identified outfalls that discharge directly into surface waters of the state and discharge points that discharge into other MS4 drainage systems. The Rochester Community Schools drainage system discharges directly or indirectly into the Clinton River watershed and sub-watersheds as detailed in Map 2 below.

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

**Map 2 – District Watershed Map<sup>2</sup>**



<sup>2</sup> Watershed boundaries based on Environmental Protection Agency MiEnviro Mapper National Hydrography Dataset Mapper 12-Digit Watersheds.

### 1.3 Enforcement Response Procedures

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

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

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

The tracking of instances of noncompliance includes the following information:

- Name
- Date
- Location of Violation (address, cross streets, etc.)
- Business/Agency/Organization (as appropriate)
- Description of Violation
- Description of Enforcement Response
- Date Violation was Resolved

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

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

## 2.0 Stormwater Management Program Plan (SWMP) Minimum Control Measures

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

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

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

### 2.1 Public Involvement/Participation Program (PPP)

Engaging and empowering the public in the effort to reduce the impacts of stormwater runoff is a key element of the public involvement/participation program.

#### 2.1.1 Public Involvement/Participation Program Objectives

1. Process for making the Stormwater Management Plan available for public inspection and comment.
2. Process for inviting public involvement and participation in the implementation of SWMP best management practices and periodic review of the SWMP.

#### 2.1.2 Public Involvement & Participation Procedure

1. As required, the approved Stormwater Management Program (SWMP) will be made available to the public via the district website throughout the permit cycle.
2. The stormwater webpages will include contact information for public comments.
3. The public will be notified through announcements or newsletters that a copy of the SWMP is available on the district stormwater webpage.
4. A public survey has been developed and placed on the Rochester Community Schools stormwater webpage in an effort to provide input into stormwater implementation.

5. A link to a stormwater blog “Cleanwater Chronicles” has been added to the Rochester Community Schools stormwater webpage. The stormwater blog explains water quality issues and promotes opportunities for public involvement.
6. Cooperation with local watershed protection groups.

### **2.1.3 Public Involvement & Participation Assessment**

1. Rochester Community Schools will review the public involvement & participation BMPs as part of annual SWMP review to determine level of district involvement and identify areas of improvement.



**2.1.4 Public Involvement & Participation Program (PPP) BMP Table**

<b>BMP</b>	<b>Implementation of BMP</b>	<b>Timeframe</b>	<b>Measurable Goal</b>	<b>Measure of Assessment</b>	<b>Responsible Party</b>
<b>BMP #2.1.4.1 Public Notice of SWMP</b>	Make SWMP available for public review through stormwater webpage.	Annually Throughout Permit Cycle	Public notice published in annual district wide newsletter announcing the availability of the SWMP for review, including contact information for comments.	Verify SWMP available on stormwater webpage, and track changes webpage posting of SWMP.	Rochester Community Schools
	Notification in annual district newsletter, website, or school posting to publicize updated SWMP and locations for review.			Keep copies of official SWMP posting notifications.	
	Contact information will be available on the stormwater webpages to forward comments regarding the SWMP.			Compile and track comments from the public.	
<b>BMP #2.1.4.2 Stormwater Blog</b>	Post link to stormwater blog on district website.	Ongoing Throughout Permit Cycle	A link to a stormwater blog established and maintained on the district stormwater webpage to assist in distributing information and updating the public on the watershed and activities.	Copies of monthly stormwater blog postings for reporting period.	Rochester Community Schools
<b>BMP #2.1.4.3 Stormwater Education Program Survey</b>	Post survey on district website.	Ongoing Throughout Permit Cycle	Survey posted on the stormwater webpages and link maintained throughout the permit term to assess community knowledge and provide input into stormwater implementation.	Results of completed surveys.	Rochester Community Schools
<b>BMP #2.1.4.4 Cooperation with Local Watershed Group - CRWC</b>	Engage the Clinton River Watershed Council (CRWC) to collaborate with the District in Public Education services	Ongoing Throughout Permit Cycle	Maintain service agreement with the Clinton River Watershed Council	Copy of the agreement	Rochester Community Schools

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BMP	Implementation of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.1.4.5            Public Involvement &amp; Participation Program Assessment</b>	Evaluate the effectiveness of the public involvement program.	Annually Throughout Permit Cycle	Complete as part of annual SWMP review to determine level of district involvement and identify areas of improvement. Program activities may be adjusted based on the results of the assessment.	Copies of annual SWMP review noting any areas of needed improvement.	Rochester Community Schools

## **2.2 Public Education Program (PEP)**

Rochester Community Schools' "Public Education Program (PEP)" is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants into the Rochester Community Schools separate storm sewer system.

Rochester Community Schools and the Nested MS4s have entered into a collaborative agreement with the Clinton River Watershed Council (CRWC) and is included in the Clinton River Watershed, Anchor Bay, Lake St. Clair Direct Drainage Collaborative Public Education Plan. The plan will be implemented collaboratively throughout the permit cycle. Copies of CRWC documents are included in Appendix C.

CRWC's program includes the following major components:

- Education of the public and recruitment of volunteers in each sub watershed through a variety of outreach methods (presentations, workshops, websites, cable TV, print media, etc.).
- Regular volunteer training sessions and establishment of water quality monitoring sites throughout each sub watershed.
- Quarterly stormwater management forums for municipal staff, City Council members, planners, engineers, consultants, MDEQ MS4 permit staff, and other watershed stakeholders to share information and discuss topics related to stormwater management, planning, and infrastructure development.
- Coordination of other on-going education and stewardship efforts, including River Day, Weekly Clean, Clinton Clean-Up, paddling events, water festivals, Adopt-A-Stream citizen science program, the Stream Leaders student river monitoring program, and the RiverSafe LakeSafe program.
- Engage and collaborate with municipalities to promote and facilitate CRWC's WaterTowns™ place making initiative focused on connecting communities to their waterways through education, green stormwater infrastructure, history, art, and
- Development and distribution of supporting print and web-based materials.

### **2.2.1 Public Education Program Objectives**

- A. Promote public responsibility and stewardship in their watershed.
- B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.
- C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.
- D. Promote preferred cleaning materials and procedures for cars, pavement, and power washing.
- E. Inform and educate the public on the proper application and disposal of pesticides, herbicides, and fertilizers.
- F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter the MS4.
- G. Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.
- H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.
- I. Educate the public on and promote the benefits of green stormwater infrastructure and Low Impact Development.
- J. Promote methods for managing riparian lands to protect water quality.



### **2.2.2 Public Education Program Procedure**

Rochester Community Schools shall implement the PEP topics and objective directed and outlined in Table 1 of the Clinton River Watershed, Anchor Bay, Lake St. Clair Direct Drainage Collaborative Public Education Plan. Actions are outlined in the public education program table.

**2.2.3 Public Education Program BMP Table**

Referenced the Clinton River Watershed, Anchor Bay, Lake St. Clair Direct Drainage Collaborative Public Education Plan

BMP Topic	BMP Description	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
<b>BMP #2.2.3.1 I-J Stormwater Education: Industrial and Commercial Facilities</b>	Provide educational materials and BMP fact sheets to industrial and commercial facilities. Target 2 industrial/commercial sectors per year. Distribute BMP information via email that is created specifically for each sector.	Ongoing Throughout Permit Cycle	Target 2 sectors per year. Distribute BMP fact sheets through annual email blast to designated contact at each facility. Track distribution via list of businesses and emails sent.	This BMP topic does not apply to Rochester Community Schools.		
<b>BMP #2.2.3.2 A-J Presentations and Displays</b>	Provide displays and presentations for water quality-related events upon request and availability of staff time display to public at least once in the next 5 years.	Once per Permit Cycle	Host display once during permit cycle.	Photo conformation of display.	Employees and property owners at industrial and commercial facilities. Property developers, planners, engineers.	Rochester Community Schools
<b>BMP #2.2.3.3 A-J Regional Public Education Materials</b>	Distribute resources available from SEMCOG 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 are available on the Ours to Protect Website. at <a href="http://www.semco.org/oursto_protect.aspx">http://www.semco.org/oursto_protect.aspx</a>	Ongoing Throughout Permit Cycle	Distribute educational materials (pamphlets, brochures, tip cards) on request from MS4 permit communities, on various topics at community facilities and events. MS4 communities have an excel spreadsheet to track distribution.	Maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).  Host SEMCOG link on the stormwater webpages.	Citizens including the general public and county and municipal employees.	Rochester Community Schools

BMP Topic	BMP Description	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
<b>BMP #2.2.3.4                      A-J                      Sub Watershed                      Website</b>	Hosted by CRWC website; features sub watershed map, photos, description, events, and links to education resources. MS4 permittees will provide links to the CRWC website of their own websites.	Ongoing Throughout Permit Cycle	Provide working links to websites.	Update webpages as necessary. Confirm posting & track webpage reviews.	Citizens including the general public and county and municipal employees.	Rochester Community Schools
<b>BMP #2.2.3.5                      A-J                      Community                      Information</b>	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; 4 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.	Four (4) per Fiscal Year	Publish via print or digital media 4 articles per year.	Maintain copies of email notices (watershed announcement) of educational materials provided to district staff.	Citizens including the general public and county and municipal employees.	Rochester Community Schools

BMP Topic	BMP Description	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
<b>BMP #2.2.3.6                      A, C, &amp; G                      Household                      Hazardous                      Waste                      Information</b>	Post and maintain links to county websites for information regarding household hazardous waste collection events on the Stormwater Public Education and Links Page.	Ongoing Throughout Permit Cycle	Address the environmental (including water quality) and public health effects resulting from improper handling and disposal of household hazardous waste, reduce the use of home toxics, keep citizens informed about the choices and responsibilities associated with purchasing, handling, and disposing of toxic substances. Increase the number of residents using the program to dispose of home toxics.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Rochester Community Schools
<b>BMP #2.2.3.7                      A, G                      Recreational                      Vehicle Waste                      Dumpsites</b>	Post and maintain links to recreational vehicle (RV) waste dump sites in the region on the district's Stormwater Public Education and Links page.	Ongoing Throughout Permit Cycle	Provide working links to websites.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Rochester Community Schools
<b>BMP #2.2.3.8                      A-J                      Riparian                      Information                      Distribution</b>	Maintain information on riparian landowner educational material on the district's Stormwater Public Education and Links page.	Ongoing Throughout Permit Cycle	Educate on why riparian zones are important, what riparian zone management is (river friendly lawn care, riparian buffer zones, stream bank stabilization, woody debris management, river maintenance). Increase number of riparian landowners who implement BMPs.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Rochester Community Schools

<b>BMP Topic</b>	<b>BMP Description</b>	<b>Timeframe</b>	<b>Measurable Goal &amp; Key Messages</b>	<b>Measure of Assessment</b>	<b>Target Audience</b>	<b>Responsible Party</b>
<b>BMP #2.1.4.5                      Public Education Program Assessment</b>	Evaluate the effectiveness of the public education program.	Annually Throughout Permit Cycle	Complete as part of annual SWMP review to determine level of district involvement and identify areas of improvement. Program activities may be adjusted based on the results of the assessment.	Copies of annual SWMP review noting any areas of needed improvement.	Students, faculty, and community	Rochester Community Schools

### **2.2.4 Curriculum**

Rochester Community Schools has conducted a review of the current State of Michigan K-12 science curriculum to determine which topics and grade levels have applicability toward the goals of the SWMP. The Rochester Community Schools K-12 science curriculum has been developed as required under Michigan Department of Education “Grade Level Content Expectations”. Rochester Community Schools encourages schools to incorporate watershed awareness, pollution prevention, recycling, ecology, and energy conservation into the core curriculum throughout the district.

The current K-12<sup>th</sup> grade Earth Science curriculum provides students with a wide range of topics specifically related to this permit. A listing of current (K-12) grade level curriculum topics including grade level, curriculum code, description, and any additional activities included in the specific course work is provided in the table below.

#### **Stormwater Program Related Science Curriculum K-12<sup>th</sup> Grade**

<b>Grade</b>	<b>Curriculum Code</b>	<b>Description</b>
K	K-ESS3-3	Communicate solutions that will reduce the impact of humans on the land, water, air, and/or other living things in the local environment.
2	2-ESS1-1	Use information from several sources to provide evidence that Earth events can occur quickly or slowly
2	2-ESS2-2	Develop a model to represent the shapes and kinds of land and bodies of water in an area.
2	2-ESS2-3	Obtain information to identify where water is found on Earth and that it can be solid or liquid.
4	4-ESS2-1	Make observations and/or measurements to provide evidence of the effects of weathering or the rate of erosion by water, ice, wind, or vegetation
5	5-ESS2-2	Describe and graph the amounts and percentages of water and fresh water in various reservoirs to provide evidence about the distribution of water on Earth.
5	5-ESS3-1	Obtain and combine information about ways individual communities use science ideas to protect the Earth’s resources and environment.
6-8	MS-ESS2-4	Develop a model to describe the cycling of water through Earth’s systems driven by energy from the sun and the force of gravity.

Grade	Curriculum Code	Description
6-8	MS-ESS3-1	Construct a scientific explanation based on evidence for how the uneven distributions of Earth’s mineral, energy, and groundwater resources are the result of past and current geoscience processes.
6-8	MS-ESS3-3	Apply scientific principles to design a method for monitoring and minimizing a human impact on the environment.
6-8	MS-ESS3-4	Construct an argument supported by evidence for how increases in human population and per-capita consumption of natural resources impact Earth’s systems.
9-12	HS-ESS2-5	Plan and conduct an investigation of the properties of water and its effects on Earth materials and surface processes.
9-12	HS-ESS3-1	Construct an explanation based on evidence for how the availability of natural resources, occurrence of natural hazards, and changes in climate have influenced human activity
9-12	HS-ESS3-6	Use a computational representation to illustrate the relationships among Earth systems and how those relationships are being modified due to human activity.

**2.2.5 Public Education Program Effectiveness**

The effectiveness of the public education program will be evaluated based on progress made towards meeting the BMP objectives described above.

The District has implemented a “Watershed Awareness Survey” to be used as an evaluation. The purpose of these surveys is to provide an assessment of public understanding of issues in the watershed related to pollution from stormwater runoff. Results would be used to guide Rochester Community Schools in identifying opportunities for enhancement of the PEP. Additionally, Rochester Community Schools will conduct an annual review of the public education best management practices to determine if they have been implemented and identify areas of improvement.

## **2.3 Illicit Discharge Elimination Program (IDEP)**

The following Rochester Community Schools Illicit Discharge Elimination Program is designed to identify, locate, prohibit, and effectively eliminate illicit discharges, including discharges of sanitary wastewaters, to the permitted separate stormwater drainage systems.

### **2.3.1 Illicit Discharge Elimination Program (IDEP) Program Objectives**

1. Establish authority to investigate, inspect and monitor suspected illicit discharges.
2. Maintain maps of the MS4, points of discharge, and outfalls.
3. Prohibit non-stormwater discharge into the MS4.
4. Provide regular training to staff.
5. Instruct contractors to prevent dumping into the MS4.
6. Conduct routine dry weather screening.
7. Conduct source investigations if the source of an illicit discharge/connection is not identified by field screening.
8. Illicit discharge identification and elimination program performance & effectiveness.

### **2.3.2 Facility Site Storm Sewer System Maps and Lists**

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

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

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

Copies of the current facility storm sewer system maps are available at the Facility and Operations Center, 1401 West Hamlin Road, Rochester Hills, Michigan 48309. Additionally, copies of the storm sewer system maps and a list of the outfalls and points of discharge are provided in Appendix A.

### **2.3.3 Illicit Discharge Identification & Investigation Procedure – Field Observations**

Rochester Community Schools will conduct field observations for 100% of all outfalls and points of discharge locations during dry weather or more expeditiously if Rochester Community Schools becomes aware of a non-stormwater discharge. Outfalls and points of discharge will be inspected by personnel trained to recognize all signs of possible illicit discharges. Dry weather screening will occur at once per permit cycle. Rochester Community Schools will conduct DWS once during this 5-year permit cycle. Preferably, each outfall and points of discharge will be inspected and evaluated following a period of at least 48-72 hours of dry weather.

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



- Outfall/point of discharge number
- Date/name of inspector
- Date of last rainfall
- Presence or absence of flow
- Presence or absence of standing water
- Water clarity and color
- Presence of oil sheen, trash and or other floatable materials
- Presence of bacterial sheen or slimes
- Excessive vegetative growth
- Odor
- Suds
- Presence of oil

❖ These characteristics are documented even if no flow is observed at the time of the inspection.

All field observations are detailed on a “Screening Inspection Log.” A copy of the Screening Inspection Log is provided in Appendix E.

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

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

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

If the origin of the flow is not identified during the visual upstream investigation, a grab sample is collected within 24 hours from the discharge for indicator field screening analysis. Indicator monitoring/field screening is the secondary tool utilized for dry weather flow without obvious indicators such as very high turbidity, strong odors, or visible discharge. Screening may include some or all of the indicator parameters:

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

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

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

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

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

The exact procedure for tracking the illicit discharge will depend on the particular facts of each incident. At the time of the identification of the observed dry weather flow, the flow will be tracked upstream until the source is isolated. Once the source has been isolated down to a specific site location, the work will become source confirmation. If the source is not confirmed, additional fieldwork, building evaluation, or dye testing may be necessary. Additional source investigations will be conducted within 14 days of the original observed dry weather flow.

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

### **2.3.5 Illicit Discharge/Connection Elimination Procedure**

Illicit discharges and connections are identified through reporting, routine storm sewer system inspections and dry weather screening inspections. A “How to Spot Illicit Discharges” poster along with a “How to Report/Hotline Numbers” posters are placed in the receiving/custodial areas in each facility to report concerns. Rochester Community Schools goal is to evaluate all potential unauthorized or suspected illicit discharge to the municipal separate storm sewer system (MS4) and perform any necessary notifications and reporting to the applicable agencies (i.e., EGLE, local drain commission, etc.) within the required time period(s).

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

- Suspected discharges will be investigated within 24 hours. The Rochester Community Schools will ensure enforcement actions within 7 days.
- Conduct source investigations, including applicable field screening to trace the origin of the materials within 14 days of the reported/observed illicit discharge.
  - Rochester Community Schools will follow existing spill response procedures outlined in Section 2.3.10, under Spill Response, Policy & Procedures, if required.

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

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

Once an illicit discharge has been confirmed from a Rochester Community Schools facility, the discharge will be corrected using the most expedient method possible based on the type and configuration of the discharge or connections. Other illicit discharges or releases of polluting materials will be corrected through administrative measures including employee training, placement of signs or markings, policy revisions, or any other steps necessary to eliminate the continued release of polluting materials to the MS4.

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

### **2.3.6 Illicit Discharge Regulatory Mechanism/Policy**

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

Department of Environment, Great Lakes, and Energy (EGLE). The objectives of the regulatory mechanism are:

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

Rochester Community Schools has a board policy resolution to direct compliance with these requirements. The Rochester Community Schools updated School Board Resolution was reviewed and passed in 2023. A copy of the updated School Board Policy is provided in Appendix B.

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

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

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

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

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

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

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

#### **Prohibitions of Illicit Discharges**

1. Prohibition of Illicit Discharges:
  - a. Rochester Community Schools prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.

2. The following discharges are NOT prohibited:
  - a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the Rochester Community Schools MS4. Discharge or flows from firefighting activities will be addressed only if they are identified as significant sources of pollutants to surface waters of the state.
  - b. The following activities are not prohibited under this policy unless they are determined to be significant sources of pollutants to surface waters of the state:
    - Water line flushing and discharges from potable water sources.
    - Landscape irrigation runoff, lawn water runoff, and irrigation waters.
    - Diverted stream flows and flows from riparian habitats and wetlands.
    - Rising groundwater and springs.
    - Uncontaminated groundwater infiltration and seepage.
    - Uncontaminated pumped groundwater, except groundwater cleanups specifically authorized by NPDES permits.
    - Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps.
    - Air conditioning condensation.
    - Waters from noncommercial car washing (runoff from family home).
    - 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 EGLE.)

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

#### **Prohibition of Illicit Connections**

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

#### **2.3.7 Illicit Discharge Elimination Training**

A training program is an important component of an effective IDEP. Training is required for all employees whose job responsibilities involve illicit discharge related activities, or indicate a potential to cause, witness, or report an illicit discharge or connection. Training is discussed in detail in Section 3.0 of this SWMP.

#### **2.3.8 Illicit Discharge Elimination Program Effectiveness**

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

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

The District shall evaluate:

1. Evaluate the number of illicit discharges and determine if discharges have decreased throughout the permit cycle.
2. Evaluate if the number of reported potential discharges has increased due to improved awareness.
3. Evaluate dry weather screening monitoring data to measure changes in water quality.

**2.3.9 Illicit Discharge Elimination Program – BMP Table**

<b>BMP</b>	<b>Description of BMP</b>	<b>Timeframe</b>	<b>Measurable Goal</b>	<b>Measure of Assessment</b>	<b>Responsible Party</b>
<b>BMP #2.3.9.1 Facility Storm Sewer System Maps</b>	Provide an up-to-date storm sewer system map. The maps shall identify the storm sewer system, location of outfalls and points of discharge, and names and locations of the surface waters of the state receive the discharge.	Maps Completed in 2016	100% of facilities mapped, and 100% of storm sewer system updates mapped.	Maintain facility site maps at the Facility and Operations Center, 1401 West Hamlin Road, Rochester Hills, MI 48309.	Rochester Community Schools
		Updates Ongoing as Needed throughout Permit Cycle		Update facility map with sewer system updates. Maintain maps for progress report submittal.	Rochester Community Schools
<b>BMP#2.3.9.2 Enforcement</b>	Written policy to enforce elimination of illicit discharges into MS4 owned by the Permittee.	Illicit Discharge Regulatory Policy Developed and Board Resolution Passed in 2023	Illicit Discharge Regulatory Policy developed, and Board Policy Resolution reviewed and approved by the school board.	Copy of the Illicit Discharge Regulatory Policy and Approved Board Resolution	Rochester Community Schools
				Copy of policy available on the district stormwater webpage or emailed to staff.	
<b>BMP #2.3.9.3 Dry Weather Screening</b>	Dry Weather Screening conducted once per permit cycle. Dry weather screening will be conducted by personnel trained to recognize all signs of possible illicit discharges.	DWS Scheduled to be completed once during the permit cycle	100% of outfalls and point of discharges inspected and evaluated following a period of 48-72 hours of dry weather. Outfalls/points of discharges re-inspected if necessary.	Maintain dry weather screening inspection logs/reports.	Rochester Community Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.3.9.4                      Illicit Discharge Reporting</b>	Eliminate illicit discharges and connections through reporting, routine storm sewer system inspections and dry weather screening inspections.	Ongoing Throughout Permit Cycle	Place “How to spot illicit discharge/ How to Report-Hotline Numbers” posters placed in Receiving Rooms at each Rochester Community Schools facility. Goal is to have one poster at each facility.	Annually verify number of posters in place throughout the district.	Rochester Community Schools
			Advertise reporting hotline on district webpage.	Track number of calls and document calls onto Illicit Discharge/Illegal Dumping Reporting form. (Appendix B).	
<b>BMP #2.3.9.5                      Unauthorized Discharge/ Illicit Discharge Complaint Response</b>	The district will immediately evaluate any potential unauthorized or suspected illicit discharge to the municipal separate storm sewer system (MS4) and perform any necessary notifications and reporting to the applicable agencies (i.e., EGLE, local drain commission, etc.) within the required time period(s). This procedure is outlined in Section 2.3.10 Polluting Materials Emergency and Spill Response Policy & Procedures.	Suspected discharges will be investigated within 24 hours. The Rochester Community Schools will ensure enforcement actions within 7 days.	100% of unauthorized or suspected illicit discharges evaluated (field observation, field screening, and source investigation) and eliminated.	Documentation of relevant field observations, field screening or source investigations.	Rochester Community Schools
		Within 14 days of reported suspected discharge.			
<b>BMP #2.3.9.6                      Illicit Connections</b>	Reroute, repair, or disconnect any illicit connections.	Within 60 days of identified illicit connection	Take steps to eliminate 100% of identified illicit connections.	Work order, receipt or report detailing the illicit connection correction activities.	Rochester Community Schools



BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.3.9.7 Illicit Discharge Elimination Training</b>	Train staff on the identification and reporting of illicit discharges or improper connections and the cleanup/notification procedures for spills of polluting materials.	Once per permit cycle or during the 1 <sup>st</sup> year of employment Throughout Permit Cycle	Goal of providing illicit discharge elimination training to all maintenance, transportation, custodial and skilled trade staff who work for Rochester Community Schools. <b>[All Stormwater Training is outlined in Section 3.0 Training]</b>	Copy of sign in sheets and Agenda (if available).	Rochester Community Schools
<b>BMP #2.3.9.8 Notice of Intent to Discharge Tracer Dyes</b>	Maintain approval from the EGLE for authorization to discharge tracer dyes in surface waters per General Rule 97 to conduct source investigations.	As needed Throughout Permit Cycle	EGLE approval to discharge tracer dyes.	Documentation of EGLE approval.	Rochester Community Schools
<b>BMP #2.3.9.9 IDEP program Performance &amp; Effectiveness</b>	Review performance measures to evaluate the effectiveness of the IDEP program. Items include posting of IDEP public education posters, number of outfalls/discharge points screened, number of illicit connections found, number of illicit connections eliminated, number and type of violations investigated, and number of scheduled clean-outs and routine maintenance work conducted.	Annually Throughout Permit Cycle	Annual review of SWMP IDEP program performed. Evaluate reduced illicit discharges, increase reporting, and evaluate dry weather screening data.	Maintain copy of SWMP annual review and evaluation information for progress reporting.	Rochester Community Schools

### **2.3.10 Polluting Materials Emergency and Spill Response Policy and Procedures**

#### **Purpose**

This policy and associated procedures have been developed to define appropriate and safe response procedures for spill or accidental releases of hazardous materials or substances at all Rochester Community Schools' facilities.

#### **Policy**

Only trained and authorized personnel are permitted to respond to hazardous materials incidents! Employees must be trained in the safe use of chemicals or chemical management prior to working in a lab or cleaning up minor spills. The Stormwater Program Manager will immediately report any release of any polluting materials from the MS4 to surface waters or groundwater of the state, unless a determination is made that the release is not in excess of the threshold reporting quantities in the Part 5 Rules and comply with all Federal, State, and local regulatory requirements for the management and reporting of all hazardous materials and/or waste releases.

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

- The EGLE Warren District Office at (586)-753-3700 during regular working hours.
- The 24-hour Michigan Pollution Emergency Alerting System (PEAS) at 1-800-292-4706 after working hours.

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

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

The Stormwater Program Manager will maintain responsibility for monitoring any changes in regulatory requirements regarding hazardous materials and waste spills or accidental releases. This policy will be revised as necessary based upon any changes in the regulatory requirements or internal experiences. All hazardous materials spills or releases will be thoroughly investigated by the Stormwater Program Manager.

#### **Emergency Spill Response Procedures**

Each facility having the potential for the release of a hazardous material or substance shall have trained and knowledgeable staff members to respond and/or implement spill response procedures for that facility. Spill containment materials such as absorbent pigs, pads, booms, diking materials, storm drain covers, etc. are to be stored and maintained at all facilities for use by trained employees in the event of a spill or accidental release.

The following general guidelines are to be implemented as applicable in managing spills and accidental releases:

##### **1. Minor Spill or Leak**

- Attempt to contain the spill.
- Wear proper Personal Protective Equipment (PPE) while cleaning up the spill/leak.
- Notify supervisor and call Stormwater Program Manager at (248) 726-3000.

##### **2. Major Spill or Leak**

- Call the Stormwater Program Manager immediately at (248) 726-3000.

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

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

This guidance has been developed in anticipation of potential releases of hazardous materials and substances. The procedures outlined in this guidance will only be implemented by those persons who have received sufficient training and are competent in the handling of the released material.

As appropriate, illicit discharges or releases of polluting materials will be corrected through administrative measures including employee training, placement of signs or markings, policy revisions, or any other steps necessary to eliminate the continued release of polluting materials to the MS4. The district will conduct follow-up inspections and sampling as needed to ensure that appropriate action has been completed.

## **2.4 Construction Site Stormwater Runoff Control Program**

Rochester Community Schools' goal is to establish procedures for construction stormwater runoff control to meet minimum measure requirements to maximum extent practicable.

**Construction** refers to actions that result in a disturbance of the land, including clearing, grading, excavating, and other similar activities.

**Construction-related activities** are activities that support the construction project such as stockpiles, borrow areas, concrete truck washouts, fueling areas, material storage areas and equipment storage areas.

### **2.4.1 Construction Site Stormwater Management Program Objectives**

- A. Process for notifying the Part 91 Agency appropriate staff when soil or sediment is discharged to the MS4 from a construction activity.
  - The procedure shall allow for the receipt and consideration of complaints or other information submitted by the public or identified internally as it relates to construction stormwater runoff control.
- B. Procedure for when to notify the EGLE when soil, sediment, or other pollutants are discharged to the MS4.
  - Other pollutants include pesticides, petroleum derivatives, construction chemicals, and solid wastes that may become mobilized when land surfaces are disturbed.
- C. Procedure for ensuring that construction activity one acre or greater in total land disturbance obtains a Part 91 Permit.

### **2.4.2 Construction Notification Procedure**

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

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

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

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

**In the event of a public complaint:**

Rochester Community Schools will track the receipt of complaints submitted by the public or noted by staff during regular course of business of soil, sediment, or other pollutants such as pesticides, petroleum derivatives, construction chemicals, and solid wastes are being discharged into the MS4.

The tracking will include:

- Name of person providing the complaint.
- Location (address or nearest cross street).
- Description of follow up (e.g., date referred to the Part 91 enforcing agency).

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

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

**2.4.3 Part 91 Permit**

Rochester Community Schools will ensure that any construction activity that result in a land disturbance meeting the following criteria:

- Greater than or equal to one (1) acre, or
- Disturb less than one (1) acre that is part of a common plan of development or sale.

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

**2.4.4 Permit by Rule Compliance**

Rochester Community Schools shall comply with the State of Michigan Permit by Rule (Rule 323.2190) for stormwater discharge from construction activity. Sites disturbing one (1) to five (5) acres with a point source discharge to the waters of the state receive automatic storm water coverage upon securing a SESC permit from the appropriate Part 91 recognized County Enforcing Agency, Municipal Enforcing Agency, or Authorized Public Agency (APA) under the authority of Part 91.

1. Construction sites with at least one (1) acre but less than five (5) acres of soil disturbance with a surface water discharge, must obtain a county or municipal SESC permit, and are required to follow the provisions of the Permit by Rule, but do not need to notify the EGLE of the construction activity.

2. Construction sites disturbing over five (5) acres with a point source discharge to the waters of the state must obtain a county or municipal SESC permit and submit a Notice of Coverage (NOC) and other pertinent documents and the appropriate fee to the EGLE.

Requirements of Permit by Rule include, but are not limited to:

- Weekly site inspections conducted by a Certified Construction Stormwater Operator.
- Inspection within 24 hours of a precipitation event that results in a discharge from the site by a Certified Construction Stormwater Operator.

**2.4.5 Construction Site Stormwater Management-BMP Table**

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<p><b>BMP #2.4.5.1                      Notification of Deposit during Inspection</b></p>	<p>Rochester Community Schools will notify the local part 91 agencies or EGLE when runoff from the construction site discharges significant pollutants to the MS4 or surface waters of the state within 24 hours of discovery or as otherwise required by the issuing agency. The Rochester Community Schools Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency. (Refer to section 2.4.2)</p>	<p>As necessary                      Throughout Permit Cycle</p>	<p>100% discharges identified and appropriate agencies notified. Control of potential system failure.</p>	<p>Documentation of Construction Stormwater Operator site inspection.</p>	<p>Rochester Community Schools</p>
	<p>Track complaints submitted by the public or noted by staff during regular course of business of soil, sediment, or other pollutants such as pesticides, petroleum derivatives, construction chemicals, and solid wastes are being discharged into the MS4.</p>			<p>Documentation of public complaint (Name of person providing the complaint, location [address or nearest cross street] description of follow up [e.g., date referred to the Part 91 enforcing agency]).</p>	<p>Rochester Community Schools</p>
<p><b>BMP #2.4.5.2                      Part 91 Permit</b></p>	<p>Rochester Community Schools will ensure that any construction activity that result in a land disturbance greater than or equal to one (1) acre or disturb less than one (1) acre that is part of a common plan of development or sale will obtain a Part 91 Permit through the site plan review process.</p>	<p>As necessary                      Throughout Permit Cycle</p>	<p>100% of permits obtained.</p>	<p>Copy of permit and associated soil erosion and sedimentation control plans.</p>	<p>Rochester Community Schools</p>

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.4.5.3                      Permit by Rule</b>	Construction sites between (1) acre but and five (5) acres of soil disturbance follow the provisions of the Permit by Rule, but do not need to notify the EGLE of the construction activity.	As necessary Throughout Permit Cycle	Goal of 100% of weekly and precipitation event inspection completed by certified Construction Stormwater Operator.	Copy of inspections.	Rochester Community Schools
	Construction sites disturbing over five (5) acres with a point source discharge to the waters of the state must follow provisions of the Permit by Rule and submit a Notice of Coverage (NOC) and other pertinent documents and the appropriate fee to the EGLE.		100% NOC obtained.	Copy of NOC	Rochester Community Schools

## **2.5 Post Construction Stormwater Controls for New Developments & Redevelopments**

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

A post-construction stormwater runoff program compliance assistance document is available via the internet at [https://www.michigan.gov/documents/deq/wrd-storm-MS4-ComplianceAssistance\\_470350\\_7.pdf](https://www.michigan.gov/documents/deq/wrd-storm-MS4-ComplianceAssistance_470350_7.pdf).

### **2.5.1 Post Construction Stormwater Management Program Objectives**

The post-construction stormwater run-off controls are necessary to maintain or restore stable hydrology in receiving waters by limiting surface runoff rates and volumes and reducing pollutant loadings from sites that undergo development or significant redevelopment.

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

The objects of this program and associated procedures are to:

- Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impacts.
- Develop and implement regulatory mechanisms for projects that disturb one or more acre, including projects less than an acre that are part of a larger common plan of development or sale and discharge into the applicants MS4.
- Ensure post construction controls to minimize water quality impacts by following water quality treatment standards.
- Require that BMPs be designed on a site-specific basis to reduce post-development total suspended solids loading.
- Procedure to meet water quality treatment and channel protection standards of new development or redevelopment projects.
- Address “hot spots.”
- Require adequate long-term O&M of BMPs by ordinance or other regulatory means.

### **2.5.2 Post-Construction Policy and Procedure**

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

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



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

- A minimum treatment volume standard to address water quality impacts.
- Channel protection criteria to address resource impairment resulting from flow volumes and rates.
- Review sites with known soil and/or groundwater contamination, including potential “hot spots” and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria to ensure that infiltration BMPs do not exacerbate existing conditions. Hot spots include areas with the potential for significant pollutant loading such as vehicle service and maintenance facilities, vehicle equipment cleaning facilities, fleet storage areas for buses, and outdoor liquid container storage.
- Drawings showing the location of stormwater control measures and the storm system.
- Details on the proposed stormwater control measures.
- Operation & Maintenance (O&M) requirements.
- Supporting information:
  - Calculations used for designing all components of the stormwater management systems.
  - Total suspended Solids (TSS) design removal rates and supporting manufacturer documentation, if applicable.
  - Geotechnical report including soil boring and infiltration test data.

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

Rochester Community Schools has developed and passed a board resolution in 2023 to direct compliance with these requirements. In addition to the board policy resolution, the following sections identify specific actions to be taken by Rochester Community Schools to ensure compliance with the applicable standards. A copy of the Rochester Community Schools School Board Policy Resolution is provided in Appendix B.

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

### **2.5.3 Water Quality Treatment Standard**

Rochester Community Schools goal is to include water quality treatment volume standards for each new construction or redevelopment project where the area of development or redevelopment exceeds one (1) acre. One or more of the following treatment standards will be included as part:

- 1) Treat the first one inch of runoff from the entire site, or
- 2) Treat the runoff generated from ninety percent (90%) of all runoff-producing storms for the project site.

The source of the rainfall data for the water quality treatment standard of requiring the treatment of the runoff generated from the ninety percent (90%) of all runoff-producing storms is:

- The EGLE memo dated March 24, 2006, which is available via the internet at [http://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent\\_557709\\_7.pdf](http://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent_557709_7.pdf)

Treatment methods shall be designed on a site-specific basis to achieve the following:

1. A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff, or
2. Discharge concentrations of TSS not to exceed 80 milligrams per liter (80mg/L).

A minimum treatment volume standard is not required where site conditions are such that TSS concentrations in storm water discharges will not exceed 80mg/L.

Treatment methods shall be designed on a site-specific basis to reduce the discharge of sedimentation or TSS from the site. Such methods may include:

1. Standpipe filters in storm water detention basins
2. Sediment filter tanks
3. Catch basin sumps
4. Aqua-Swirls®
5. Treatment trains
6. Rain Gardens
7. Pervious pavement systems

#### **2.5.4 Channel Protection Performance Standard**

Rochester Community Schools understands that channel protection criteria are necessary to maintain post-development stormwater runoff volumes and peak flow rates at or below existing levels for all storms up to the 2-year, 24-hour event. "Existing Levels" means the runoff volume and peak flow rate for the last land use prior to the planned new development or redevelopment. More restrictive channel protection criteria may be utilized on a case-by-case basis, as appropriate.

#### **Rainfall Data**

The rainfall data for calculating runoff volume and peak flow rate shall be the Rainfall Frequency Atlas of the Midwest, 1992 [National Oceanic & Atmospheric Administration (NOAA) - Huff & Angel].

#### **2.5.5 Site-Specific Requirements**

Because each site has its' own special circumstances and conditions, the following BMPs will be considered as appropriate according to site conditions:

- Reduce runoff from the site to greatest extent possible (provide holding basins, divert water through grassed swales).
- Prevent spills and discharges.
- Control waste such as building materials, concrete washout, chemicals, litter, and sanitary waste.
- Phasing will be considered to limit amount of exposed soils.
- Interim soils stabilization methods are to be considered (temporary seeding, mulching etc.).
- Buffer preservation (avoid exposing soils to property limits).
- Inspection staff will be trained in the proper maintenance and operation of Soil Erosion and Silt Prevention measures.

Construction plans will be reviewed for sites with known soil and/or groundwater contamination, including potential "hot spots" and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria to ensure that infiltration BMPs do not exacerbate existing conditions. Hot spots include areas with the potential for

significant pollutant loading such as vehicle service and maintenance facilities, vehicle equipment cleaning facilities, fleet storage areas for buses, and outdoor liquid container storage.

Additional water quality standards or pretreatment measures may be required in addition to those included in the water quality criteria in order to remove potential pollutant loadings from entering either groundwater or surface water systems.

Pretreatment measures include:

Stormwater Hot Spots	Minimum Pre-Treatment Options
<b>Vehicle service and maintenance facilities</b>	1. Oil/Water Separators/Hydrodynamic Devices 2. Use of Drip Pans and/or Dry Sweep Material under Vehicles/Equipment 3. Use of Absorbent Devices to Reduce Liquid Releases 4. Spill Prevention Response Program
<b>Fleet storage areas for buses</b>	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
<b>Vehicle Fueling Stations</b>	1. Oil/Water Separators/Hydrodynamic Devices 2. Water Quality Inserts for Inlets 3. Spill Prevention Response Program
<b>Vehicle equipment cleaning facilities</b>	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
<b>Outdoor liquid container storage</b>	Spill Prevention Response Program

### **2.5.6 Site Plan Review**

This policy is to establish a requirement to submit a site plan for review as required by the EGLE NPDES Stormwater Discharge Permit and ensure that water quality objectives, erosion and sediment control requirements, and BMP maintenance are considered to the maximum extent practicable.

Rochester Community Schools shall evaluate proposed construction activities to determine:

- If the activity meets the criteria of a development or redevelopment project with an earth disturbance greater than or equal to 1 acre, or part of a common plan of development resulting in a development or redevelopment activity greater than or equal to 1 acre in size.
- Does the development or redevelopment project discharge to waters of the state, or to a county, city, or township MS4.

If the development or redevelopment project discharges directly to waters of the state, Rochester Community Schools shall comply with the post-construction standards outlined in this SWMP.

If the development or redevelopment project discharges to a regulated county, city, or township MS4, Rochester Community Schools shall submit the site plan for review and approval. Site plan approval by the county, city, or township of an equivalent post-construction standard ensures acceptable compliance with the Rochester

Community Schools NPDES MS4 Stormwater Discharge Permit. Rochester Community Schools shall obtain and maintain a copy of the site plan approval document.

If the development or redevelopment project discharges to a county, city, or township MS4 that is not regulated or require site plan review, Rochester Community Schools shall comply with the post-construction standards outlined in this SWMP.

### **2.5.7 Long-Term Operation & Maintenance of Stormwater Controls**

Ongoing operation and maintenance of the stormwater BMPs is a critical component of the Stormwater Management Plan. All structural and vegetative stormwater control measures installed as a requirement under this section of the permit shall include guidance for maintaining maximum design performance through long-term operation and maintenance.

- Update and revise the stormwater structural controls on facility site diagrams as identified during scheduled inspections or within 30 days following the completion of a new facility or reconstruction/redevelopment site project.
- Follow long-term guidance for inspection and operation to maintain maximum design performance.
- Stormwater runoff facilities shall be maintained in good condition, in accordance with the approved storm water plan.

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

**2.5.8 Post Construction Stormwater Management-BMP Table**

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.5.8.1 Regulatory Mechanism</b>	Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impact.	Post-Construction Policy & Procedure Developed and Board Resolution Passed in 2023.	Post-Construction Policy & Procedure developed, and Board Resolution reviewed and approved by the school board.	Copy of the Post-Construction Policy and Procedure and the Approved Board Resolution	Rochester Community Schools
	Develop and implement regulatory mechanisms for projects that disturb one or more acre, including projects less than an acre that are part of a larger common plan of development or sale and discharge into the applicants MS4.				
<b>BMP #2.5.8.2 Post Construction Standards</b>	Ensure post-construction channel protection standards and water quality treatment standards are met.	As necessary Throughout Permit Cycle	All development or redevelopment projects meet water quality and channel protection standards outlined in the districts SWMP or meets an equivalent post-construction standard for the township, city, or county.	Copy of calculations.	Rochester Community Schools
<b>BMP #2.5.8.3 Site Specific</b>	Rochester Community Schools will review construction plans for sites with known soil and/or groundwater contamination, including potential "hot spots" and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria.	As necessary Throughout Permit Cycle	Reduce or eliminate discharge of pollutants during construction on contaminated sites.	Documentation of additional stormwater controls.	Rochester Community Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<p><b>BMP #2.5.8.4 Site Plan Review</b></p>	<p>Prepare and submit a written application, including site plan for construction of storm water management systems for all new construction or redevelopment projects where the area of development or redevelopment exceeds one (1) acre.</p>	<p>As necessary Throughout Permit Cycle</p>	<p>If the development or redevelopment project discharges to a regulated county, city, or township MS4, the district shall submit the site plan for review and approval. Site plan approval by the county, city, or township of an equivalent post-construction standard ensures acceptable compliance with the districts NPDES MS4 Stormwater Discharge Permit.</p>	<p>Obtain and maintain a copy of the site plan approval document and copy of calculations.</p>	<p>Rochester Community Schools</p>
			<p>If the development or redevelopment project discharges directly to waters of the state, the district shall comply with the post-construction standards outlined in this SWMP.</p> <p>If the development or redevelopment project discharges to a county, city, or township MS4 that is not regulated or require site plan review, Rochester Community Schools shall comply with the post-construction standards outlined in this SWMP.</p>	<p>Copy of calculations.</p>	
<p><b>BMP #2.5.8.5 Long-Term Operation &amp; Maintenance of Stormwater Controls</b></p>	<p>All structural and vegetative stormwater control measures installed as a requirement under this section of the permit shall include guidance for maintaining maximum design performance through long-term operation and maintenance.</p>	<p>Within 30 days following the completion of a new facility or reconstruction/redevelopment site project.  Throughout Permit Cycle</p>	<p>Follow long-term guidance for inspection and operation to maintain maximum design performance.</p> <p>Stormwater runoff facilities shall be maintained in good condition, in accordance with the approved storm water plan.</p>	<p>All storm sewer site maps updated. Maintain all inspection, maintenance, and repair reports conducted by staff or contractors.</p>	<p>Rochester Community Schools</p>

## **2.6 Pollution Prevention & Good Housekeeping Program**

Develop, implement, and ensure compliance through a program of operation & maintenance of BMPs, with the ultimate goal of preventing or reducing pollutant runoff to the maximum extent practicable from operation that discharge stormwater to surface waters of the state.

### **2.6.1 Pollution Prevention & Good Housekeeping Program Objectives**

- a. Maintain an up-to-date inventory of owned facilities and stormwater structural controls.
- b. Procedure for updating and revising inventory of stormwater structural controls.
- c. Procedure for assessing each facility for the potential to discharge pollutants.
- d. Develop an SOP (SWPPP) for all facilities with a high potential for pollutant runoff.
- e. Procedure identifying BMPs currently implemented or to be implemented to prevent or reduce pollutant runoff at each facility with medium and lower potential to discharge.
- f. Procedure for prioritizing of catch basins/manholes for maintenance and cleaning.
- g. Schedule for routine catch basin/manhole inspection, maintenance, and cleaning.
- h. Provide the geographic location of stormwater structures.
- i. Procedure for dewatering, storage and disposal of materials extracted from storm sewer cleaning.
- j. Procedure for inspecting and maintaining storm water controls.
- k. Procedure for new structural controls to be designed and implemented in accordance with post-construction stormwater runoff control performance standards.
- l. Best management practices for operation and maintenance activities.
- m. Procedure for street sweeping.
- n. Procedure for pesticide application.
- o. Training.
- p. Contractor requirements and oversight.

It is the ultimate goal of Rochester Community Schools to prevent and reduce pollutant/contaminant runoff from Rochester Community Schools facilities to the maximum extent practicable. All BMPs are implemented at all low, medium, and high priority facilities.

### **2.6.2 Structural Control Inventory & Schedule Table**

No prioritization will be needed, as all structures are to be inspected and maintained equally. All structural controls will have routine inspection, maintenance schedules, and long-term procedures which adequately control, to the maximum extent practicable, pollution removal and control. Structural control effectiveness will be determined based on the results of these inspections and repaired, upgraded, or replaced as indicated.

The structural Control Inventory and Schedule Table for each property are in Appendix F.

### **2.6.3 Facility Assessment & Prioritization**

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

Rochester Community Schools considered the following when assessing each facility:

- Absence of any factors,

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

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

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

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

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

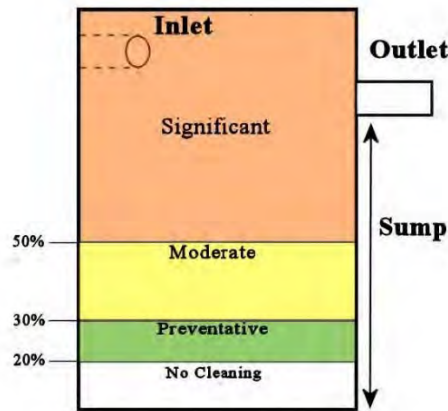
#### **2.6.4 Storm Sewer Structure Controls Inspection & Maintenance Policy & Procedure**

1. Develop a schedule for inspecting and maintaining catch basins and stormwater controls at each facility, for the reduction of pollutant runoff. A schedule is included in Appendix E.
2. Visually inspect all stormwater controls identified on facility maps. Inspection includes:
  - a. Structural integrity of the structure.
    - Areas of significant cracking or sinkholes.
  - b. Sediment build-up.
    - Areas with high amounts of build-up sediment. A build-up of accumulated solid material that is greater than or equal to the one-third guideline established by the EPA or between 30 and 50% of the total sump depth, as established by the EGLE<sup>3</sup>.

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<sup>3</sup> Michigan Department of Environment, Great Lakes, and Energy EGLE NPS BMP Manual – Catch Basins





- c. Color, odor, sheen, and flow.
  - d. Overall functionality and presence of erosion.
  - e. Pond evaluation.
3. Note inspection information on the inspection form. A copy of the inspection form “Structural BMP Table” is located in Appendix E.
4. When inspecting stormwater controls, review the site for non-structural BMPs currently implemented to prevent or reduce pollutant runoff at each facility. BMPs include:
  - a. Review of “No Dumping” stencils at storm drains.
  - b. Review of catch basins/manholes cleaned.
  - c. Dumpster good housekeeping practices.
  - d. Garden, green space and signage inventories.
  - e. “SEMCOG” poster placement at facilities.
  - f. Illicit discharge reporting numbers poster placement at facilities.
  - g. “How to spot illicit discharge/ How to Report-Hotline Numbers” poster placement at facilities.
  - h. Spill kit availability at facilities.
5. Following the inspection, the stormwater controls will be prioritized for cleaning and maintenance in a timely manner. Prioritize locations based on the following:
  - Drainage structures that are designated as consistently generating the highest volumes of trash and/or debris.
  - Areas with high amounts of build-up sediment. Refer to number 2 (b) above.
  - Areas of significant erosion.
  - Areas of significant cracking or sinkholes.
6. Once the inspection is complete, the stormwater manager or designated person will review the report and determine if a work order or other item is needed to work with relevant departments or contractors to fix any problems.
7. If an illicit discharge is suspected, follow the procedure outlined in [Section 2.3 Illicit Discharge Elimination Program](#).
8. Retain inspection forms for each stormwater structural control inspected.
9. Retain documentation regarding the scheduling or completion of the repair/maintenance if completed.
10. Debris and maintenance waste removed as part of the maintenance and/or repairs shall be disposed of in accordance with the [Structural BMP Operation & Maintenance Waste Disposal procedures](#).

Furthermore, staff members conducting maintenance and grounds activities are provided IDEP and pollution prevention/good housekeeping training. All structural controls will have routine inspection, maintenance schedules, and long-term procedures which adequately control, to the maximum extent practicable, pollution removal and

control. Structural control effectiveness will be determined based on the results of these inspections and repaired, upgraded, or replaced as indicated. This procedure will be reviewed on an annual basis and updated as needed or 30 days following the implementation of a new stormwater structural control.

### **2.6.5 Structural BMP Operation & Maintenance Waste Disposal Procedures**

Waste materials generated from operation, maintenance, and cleaning activities associated with storm sewer systems have typically been discharged back into the storm sewer system. This type of discharge is unauthorized per Part 31, Water Resources Protection (Part 31) of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA) and is therefore illegal. The combined solid and liquid waste stream (solid/liquid waste) from cleaning storm sewer systems is legally defined as “Liquid Industrial By-products” pursuant to Part 121, Liquid Industrial By-products (Part 121) of NREPA.

Rochester Community Schools will ensure that all waste materials generated during operation and maintenance of structural stormwater controls are properly characterized, transported, and disposed as required under State of Michigan PA 451 Part 111 (hazardous wastes), Part 121 (liquid industrial by-products), and Part 115 (solid wastes). At a minimum, the following procedures will be implemented for wastes generated from cleaning or maintaining storm sewer structural controls.

#### **Waste Disposal Methods for Non-Contaminated Materials**

Non-contaminated waste materials generated during cleaning or maintenance of storm sewer structures will be properly disposed using one of the following methods:

1. Have the waste transported to drying beds to separate the solid/liquid waste. This is usually performed at a publicly owned treatment plant or at a privately-owned permitted facility where the liquid portion of the waste stream is separated from the solids and treated.
2. Request permission from the local wastewater treatment plant operator to discharge the combined solid/liquid waste into the sanitary system. Most treatment plants will require pre-treatment prior to the discharge. All applicable local ordinance provisions must be followed.
3. When conducting catch basin maintenance activities where the above options are not available, the following methods can be used as long as there are no discharges to surface waters during dry weather conditions:
  - Conduct visual inspection to ensure the water in the sump has not been contaminated. If necessary, collect a grab sample of the water and look for signs of contamination such as visible sheen, discoloration, obvious odor, etc. If there is any doubt of the quality of the water, it will be collected into a vacuum truck and treated as Liquid Industrial By-Products under Part 121 or Part 115 of PA 451 (NREPA).
  - Using a sump pump, or any other pumping mechanism, remove the majority of water in the sump of the basin without disturbing the solid material below. Do not use pumps connected to the vacuum truck’s holding tank.
  - The clear water may then be directly discharged to one of the following:
    - Sanitary system (with prior approval from local sewer authority).
    - Curb and gutter.
    - Back into the storm sewer system as long as it is contained within the system during dry weather conditions to ensure no discharge into surface water.
    - Applied to the ground adjacent to the catch basin (evenly distributed at a maximum rate of 250 gallons/acre/year).

- The remaining liquid/solid in the sump will be collected with a vacuum truck and disposed of off-site in accordance with MI P.A. 451 Parts 115 or 121.

Rochester Community Schools does not currently own or operate storm sewer cleaning or transportation equipment. If Rochester Community Schools contracts with a private contractor to transport liquids generated from cleaning of catch basins or other structures, that contractor must be registered and permitted as a Uniform Liquid Industrial By-Product Hauler under the provisions of HMTA.

#### **Waste Disposal Methods for Contaminated Materials**

Waste materials generated during operation and maintenance of storm sewer systems found or suspected to be contaminated with pollutants or hazardous substances will be characterized, packaged, marked, labeled, stored, transported, and disposed as a liquid industrial by-product under Part 121 or Part 115 of PA 451 (NREPA).

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

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

#### **PROCEDURE**

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

#### **Roadways/Parking Lots**

Maintenance: Pothole, sidewalk, curb, and gutter repair.

Possible Pollutants: Fuel, oil, sediment, concrete.

BMPs to address Pollutants:

1. Contractors and in-house staff contracted to complete these jobs are informed of stormwater management practices to reduce pollution in stormwater.
2. Avoid mixing excess amounts of fresh concrete or cement.
3. Never dispose of washout into the street, storm drains, ditches, or creeks.
4. Stencil storm drains to prevent disposal of wash water.
5. Schedule patching, resurfacing and surface sealing during dry weather.
6. If it rains unexpectedly, take appropriate action to prevent pollution of stormwater runoff (e.g., divert runoff around work areas, cover materials).
7. Maintain pollution prevention/good housekeeping practices, which is to remove stockpiles (asphalt materials, sand, etc.) by the end of the day to a covered location. Alternatively, cover the piles if they cannot be moved.

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

### **Cold Weather Operations**

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

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

**BMPs to address Pollutants:**

1. Keep all deicing material covered or in waterproof containers.
2. Prevent deicer drainage to storm sewers.
3. Mechanical removal of as much snow or ice as possible prior to applying deicing chemicals.
4. Proper salt storage management.
5. Maintain application equipment per manufacturer's recommendations. Calibration is not available.

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

A Pollution Incident Prevention Plan (PIPP) has been implemented for the salt storage at the Facility Operations Center. The PIPP is reviewed every three (3) years.

### **Vehicle Washing**

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

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

**BMPs to address Pollutants:**

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

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

### **Vehicle Maintenance**

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

**BMPs to address Pollutants:**

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

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

### **Landscaping**

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

BMPs to address Pollutants:

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

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

### **Septic System (Hugger Elementary School)**

Possible Pollutants: Sewage and chlorine

BMPs to address Pollutants:

1. Inspect septic system annually
2. Pump out septic system annually

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

### **Land Disturbance**

Possible Pollutants: Sediment runoff.

BMPs to address Pollutants:

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

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

### **ASSESSMENT**

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

### **2.6.7 Street Sweeping Procedure, Prioritization & Schedule**

#### **PRIORITIZATION**

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

- Potential for polluting activities to be conducted outside
- Proximity to water bodies
- Traffic volume

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- Land use
- Absence of any factors

**PROCEDURE**

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

1. Conduct seasonal efforts to remove leaves.
2. Inspect parking lot and street areas.
3. Conduct hand sweeping of debris to prevent accumulated wastes in the spring and the fall.
4. Waste disposal areas will be kept free of litter and debris.
5. Analyze sediment, removed from an inlet cleaning if it is suspected of being contaminated with a hazardous material, prior to disposal. Sediment or materials determined to be hazardous waste will be disposed of in accordance with the Structural BMP Operation & Maintenance Waste Disposal procedures.
6. Contract out street cleaning when appropriate.

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

**PRIORITIZATION LEVELS & SCHEDULE**

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

<b>Facility Name</b>	<b>Priority Level of Potential Discharge* (High, Med, Low)</b>	<b>Street Sweeping Schedule</b>
<b>Adams High School / Van Hoosen Middle School COMPLEX</b>	Medium	Hand Sweeping, Spring and Fall
<b>Baldwin Elementary School</b>	Low	Hand Sweeping, Spring and Fall
<b>Brewster Elementary School</b>	Low	Hand Sweeping, Spring and Fall
<b>Brooklands Elementary School / Race Adult Education Building</b>	Low	Hand Sweeping, Spring and Fall
<b>Caring Steps Children’s Center</b>	Low	Hand Sweeping, Spring and Fall
<b>Delta Kelly Elementary School</b>	Low	Hand Sweeping, Spring and Fall
<b>Facility Operations Center (FOC)</b>	High	Monthly Inspections, Hand Sweep as Needed

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<b>Facility Name</b>	<b>Priority Level of Potential Discharge* (High, Med, Low)</b>	<b>Street Sweeping Schedule</b>
Hamlin Elementary School	Low	Hand Sweeping, Spring and Fall
Hampton Elementary School	Low	Hand Sweeping, Spring and Fall
Hart Middle School	Medium	Hand Sweeping, Spring and Fall
Hugger Middle School	Medium	Hand Sweeping, Spring and Fall
John M. Schultz Education Center (Formerly ACE High School)	Low	Hand Sweeping, Spring and Fall
Long Meadow Elementary School	Low	Hand Sweeping, Spring and Fall
McGregor Elementary School	Low	Hand Sweeping, Spring and Fall
Meadow Brook Elementary School	Low	Hand Sweeping, Spring and Fall
Musson Elementary School	Low	Hand Sweeping, Spring and Fall
New Administration Building	Low	Hand Sweeping, Spring and Fall
North Hill Elementary School	Low	Hand Sweeping, Spring and Fall
Old Administration Building	Low	Hand Sweeping, Spring and Fall
Reuther Middle School	Medium	Hand Sweeping, Spring and Fall
Rochester High School / Transportation COMPLEX	High	Monthly Inspections, Hand Sweep as Needed
Stoney Creek High School	Medium	Hand Sweeping, Spring and Fall
University Hills Elementary School	Low	Hand Sweeping, Spring and Fall
West Middle School	Medium	Hand Sweeping, Spring and Fall

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

### **DISPOSAL**

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

### **2.6.8 Managing Vegetated Properties**

Rochester Community Schools has established this policy to prevent or reduce pollutant runoff from vegetated land:

1. Rochester Community Schools requires all contracted personnel who participate in the application of pesticides, to will be trained and licensed by the State of Michigan under the Commercial Pesticide Application Certification Program for relevant categories as applicable, to prevent or reduce pollutant runoff from vegetated land.
2. Whenever practicable, an integrated pest management technique will be implemented.

### **2.6.9 Contractor Requirements & Oversight**

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

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

Prior to conducting work, contractors shall be provided a “Stormwater Contractor Oversight Record” form. This will allow the district to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures. The “Stormwater Contractor Oversight Record” form is located in Appendix G.

### **2.6.10 Pollution Prevention/Good House Keeping Training**

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



**2.6.11 Pollution Prevention/Good Housekeeping –BMP Table**

<b>BMP</b>	<b>Description of BMP</b>	<b>Timeframe</b>	<b>Measurable Goal</b>	<b>Measure of Assessment</b>	<b>Responsible Party</b>
<b>BMP #2.6.11.1 Structural Control Inventory</b>	Provide an up-to-date inventory of the number of stormwater structural controls for each facility's (i.e., catch basins, detention ponds). Update facilities potential to discharge pollutants (high, medium, low) following the update.	Updated as needed within 30 days following the completion of a new facility or development/redevelopment.  Ongoing Throughout Permit Cycle	100% of stormwater structural controls inventoried.	Maintain list of inventories and potential to discharge priority level. Submit updated list with progress report, noting if priority levels have changed.	Rochester Community Schools
<b>BMP #2.6.11.2 SWPPP development &amp; implementation (SOP)</b>	Develop a "Stormwater Pollution Prevention Plan (SWPPP)" for maintenance, transportation, and storage facilities/Implement policies & procedures.	Developed & Implemented  Ongoing Throughout Permit Cycle	SWPPP completed and 100% of inspections implemented.	Copy of SWPPP and copy of inspections.	Rochester Community Schools
<b>BMP #2.6.11.3 Stormwater Structural Control Inspections</b>	Visually inspect stormwater controls identified on facility maps.	Annually Throughout Permit Cycle	Routine schedule implemented and inspections reviewed by stormwater manager.	Maintain inspection forms/reports.	Rochester Community Schools
<b>BMP #2.6.11.4 Review for BMP's Implemented</b>	While inspecting stormwater controls, review the site for BMPs currently implemented to prevent or reduce pollutant runoff at each facility, such as storm drain stencils, garden areas, areas cleaned, areas repaired, SEMCOG poster placement, Illicit discharge education posters, and spill kits.	Annually Throughout Permit Cycle	Annual inspections completed and reviewed by stormwater manager.	Documentation of inspection findings (number of posters, number of spill kits, inventory of gardens, pictures of stencils, pictures of spill kits).	Rochester Community Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.6.11.5                      Prioritization of Storm Sewer Locations for Maintenance &amp; Cleaning</b>	Following the inspection, the stormwater controls will be prioritized for cleaning and maintenance. Prioritize locations based on: (1) drainage structures that are designated as consistently generating the highest volumes of trash and/or debris, (2) areas with high amounts of build-up sediment, (3) areas of significant cracking or sinkholes.	Annually Throughout Permit Cycle	Prioritization locations identified.	Copy of prioritization.	Rochester Community Schools
<b>BMP #2.6.11.6                      Cleaning &amp; Maintenance (Catch Basin/ Manhole Cleaning)</b>	Rochester Community Schools will ensure that cleaning of the catch basins/manholes occur, and all waste materials generated during operation and maintenance of structural stormwater controls are properly characterized, transported, and disposed as required under State of Michigan PA 451 Part 111 (hazardous wastes), Part 121 (Liquid Industrial By-Products), and Part 115 (solid wastes).	Once per permit cycle Or More often if prioritized due to a build-up of accumulated solid material that is greater than or equal to the one-third guideline outlined in the Storm Sewer Structure Controls Inspection & Maintenance Policy & Procedure	Cleaning is completed once per permit cycle or more often if build-up of accumulated solid material reaches the action level per the procedure in section 2.6.4. All waste disposed of as required.	Copies of Waste Manifests.	Rochester Community Schools
<b>BMP #2.6.11.7                      Roadways &amp; Parking Lots</b>	Storm drains stenciled to prevent disposal of wash water into storm drains.	As needed Throughout Permit Cycle	Storm drain stencils inspected and maintained as needed.	Copy of work order. Photos of stenciling.	Rochester Community Schools
<b>BMP #2.6.11.8                      Cold Weather Operations</b>	Proper salt storage management. Maintain storage bags/equipment in good working condition and maintain application equipment per manufacturer's recommendations.	Ongoing Throughout Permit Cycle	Continue proper salt storage and management as previously implemented.	Copy of SWPPP comprehensive inspection report.	Rochester Community Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.6.11.9                      Vehicle Washing</b>	All vehicle washing and maintenance is to be performed indoors where drains connecting to the sanitary system can receive all wastes. Alternatively, vehicle washing can be performed at a commercial auto wash facility.	Ongoing Throughout Permit Cycle	100 % of applicable staff trained on were to wash vehicles.	Copy of sign-in sheets and Agenda (if available).	Rochester Community Schools
	Alternatively, rinse grass from lawn care equipment on permeable (grassed) areas.		100 % of applicable staff trained on were to wash vehicles.	Copy of sign-in sheets and Agenda (if available).	
	School car wash fundraising events will not be permitted on school grounds.		Notice sent to staff regarding policy.	Copy of e-mail or policy.	
<b>BMP #2.6.11.10                      Vehicle Maintenance</b>	All floor drains within maintenance garages dye tested to assure that no drains flow into the separate storm sewer system.	Throughout Permit Cycle	100% of floor drains inspected.	Copy of inspection report.	Rochester Community Schools
	Oil-water separators will be inspected routinely and serviced as necessary to maintain efficiency.	Annually Throughout Permit Cycle	Oil-water separators cleaned and functioning properly.	Copy of invoices or shipping papers.	
	Recycle used motor oil, diesel oil, other vehicle fluids, and vehicle parts whenever possible.	As needed Throughout Permit Cycle	Reduction in amount of disposed material and amount of material shipped for off-site disposal.	Copy of invoices or shipping papers.	

<b>BMP</b>	<b>Description of BMP</b>	<b>Timeframe</b>	<b>Measurable Goal</b>	<b>Measure of Assessment</b>	<b>Responsible Party</b>
<b>BMP #2.6.11.11 Stream Bank Inspection</b>	Conduct stream bank inspections. Inspect banks along properties to identify erosion or potential erosion problems and check for water clarity conditions. Properly maintain buffer areas.	Annually Throughout Permit Cycle	100% of bank inspections completed.	Copy of inspection sheets/reports.	Rochester Community Schools
<b>BMP #2.6.11.12 Land Disturbance</b>	Place temporary stockpiled material away from storm drains, and berm or cover stockpiles to prevent material releases into the storm drain. Protect against sediment flowing into drains.	As needed Throughout Permit Cycle	100 % of applicable staff trained.	Copy of sign-in sheets and Agenda (if available).	Rochester Community Schools
<b>BMP #2.6.11.13 Septic System Maintenance</b>	Inspect and clean septic system annually	Annually Throughout Permit Cycle	100% of septic system inspected and cleaned, preventing potential backups	Copy of cleaning documentation	Rochester Community Schools
<b>BMP #2.6.11.14 Street Sweeping</b>	Conduct hand sweeping in the parking lots/roadways in the spring and fall.	Spring & Fall Throughout Permit Cycle	Inspections completed.	Copy of work order or schedule.	Rochester Community Schools
	Street sweeping conducted by a professional sweeping company.	As needed Throughout Permit Cycle		Copy of invoice or disposal documentation.	
<b>BMP #2.6.11.15 Vegetated Properties (Pesticides)</b>	Rochester Community Schools requires all contracted personnel who participate in the application of pesticides will be trained and licensed by the State of Michigan under the Commercial Pesticide Application Certification Program for relevant categories as applicable, to prevent or reduce pollutant runoff from vegetated land.	Ongoing Throughout Permit Cycle	Application of pesticides will only be completed by trained and licensed applicators.	Documentation of in-house staff license or copy of contractor receipt.	Rochester Community Schools

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #2.6.11.16                      Contractor Oversight</b>	Rochester Community Schools requires contractors to comply with pollution prevention and good housekeeping BMPs. Rochester Community Schools will complete contractor notification, pre-project meeting and periodic inspections to provide oversight to ensure compliance.	As needed Throughout Permit Cycle	Contractors trained and informed of pollution prevention and good housekeeping techniques.	Copy of sign-in sheets, pre-project meeting notes or inspections.	Rochester Community Schools & Contractors/ Vendors
	Prior to conducting work, contractors shall be provided a "Stormwater Contractor Oversight Record" form.				
<b>BMP #2.6.11.17                      Training</b>	Pollution prevention and good housekeeping training.	Once per permit cycle or during the 1 <sup>st</sup> year of employment Throughout Permit Cycle	Goal of providing training to maintenance staff who work for Rochester Community Schools. <b>[All Stormwater Training is outlined in Section 3.0 Training]</b>	Copy of sign-in sheets and Agenda (if available).	Rochester Community Schools
<b>BMP #2.6.11.18                      Pollution Prevention &amp; Good Housekeeping Activities Review</b>	Summary of annual activities for the "Pollution Prevention and Good Housekeeping."	Annually Throughout Permit Cycle	Annual review of SWMP performed. Maintain copy of SWMP annual review. Determine the level of district involvement and identify areas of improvement.	Maintain copy of SWMP annual review and evaluation information for progress reporting.	Rochester Community Schools

## 3.0 Training

Rochester Community Schools will provide education and training for applicable employees and contractors using a variety of methods depending on their specific job function. At a minimum, all applicable Rochester Community Schools employees will be required to have general awareness training on the topics included in the PEP. All applicable Rochester Community Schools employees will be required to attend or otherwise obtain general awareness training at least once per permit cycle or during the 1<sup>st</sup> year of employment.

Rochester Community Schools has implemented a comprehensive staff training program based on each employee's participation and responsibilities under this program. The employee training program is categorized in three (3) separate levels summarized as follows:

### **LEVEL I TRAINING-General Awareness Training**

Level I training is encouraged for all district employees, parents, and students. General Awareness training is provided in the form of an 11-minute video produced by Arch Environmental Group titled, **"When it Rains, It Drains...The Stormwater Question"**. This video is also available on the stormwater webpage.

### **LEVEL II TRAINING-General Awareness, Pollution Prevention & Good Housekeeping, and Illicit Discharge Reporting**

Level II training is required for all employees whose job responsibilities involve illicit discharge related activities, or indicate a potential to cause, witness, or report an illicit discharge or connection. This training includes the previously described video as well as a review of the district's Stormwater Management Program Plan and instruction on identification and notification of illicit discharges or connections. This training is provided to applicable transportation, maintenance, custodial, and food service employees.

### **LEVEL III TRAINING-Maintenance and Storage Facility Stormwater Pollution Prevention Plans, Lawn Maintenance, and Structural Control Inspection, Maintenance, and Repair Training**

Level III training is provided in the form of videos, PowerPoint presentations, and hands-on training. This training is provided to district supervisors, maintenance, and lawn service staff.

### **LEVEL IV (CONTRACTORS) – Contractor Training/Oversight**

Contractors employed by Rochester Community Schools to conduct activities with a potential to impact water quality. Prior to conducting work, contractors shall be provided a "Stormwater Contractor Oversight Record" form.

**3.1 Training Table**

<b>BMP</b>	<b>Description</b>	<b>Measurable Goal</b>	<b>Target Audience</b>	<b>Timeframe</b>
<b>I General Awareness Training</b>	Encourage teachers, administrative and support staff to watch the General Awareness Stormwater Video "When it Rains it Drains."	Maintain on district website and Record attendance with sign-in sheets. Rochester Community Schools will retain records of trainings for future review regarding SWMP.	Teachers, administrative and support staff.	Ongoing Throughout Permit Cycle
<b>II IDEP &amp; PPGH Training</b>	General Awareness, Pollution Prevention & Good Housekeeping, and Illicit Discharge Elimination Program	Record attendance with sign-in sheets for each training session. Rochester Community Schools will retain records of trainings for future review regarding SWMP.	In-house custodial, maintenance, transportation, and food service employees.	Required once during permit cycle current employees and during the 1 <sup>st</sup> year of employment for new employees. Throughout Permit Cycle
<b>III Routine Storm Sewer Inspection Training</b>	Train appropriate employees how to conduct a storm sewer system inspection.	Record attendance with sign-in sheets for each training session. Rochester Community Schools will retain records of trainings for future review regarding SWMP.	District supervisors, in-house maintenance, and lawn service staff.	As Needed Throughout Permit Cycle
<b>IV Contractor Training/Oversight</b>	Stormwater specific training for on-site contractors.	Utilize a "Stormwater Contractor Oversight Record" form to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures.  Obtain records of training for future review of the SWMP.	Contractors employed by Rochester Community Schools to conduct activities with a potential to impact water quality.	Required at the time of employment. Throughout Permit Cycle

## 4.0 Total Maximum Daily Load (TMDL) Restrictions

### 4.1 What are TMDLs

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

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

Rochester Community Schools will review and prioritize BMPs currently implemented or to be implemented during the permit cycle to make progress toward achieving the pollutant load reduction requirement in each TMDL identified. TMDLs assigned the discharges for Rochester Community Schools are described in the below sections.

### 4.2 Statewide E. coli TMDL

The Statewide E. coli TMDL was approved by the United States Environmental Protection Agency (USEPA) on July 29, 2019. This TMDL addresses all surface waters (inland lakes, Great Lakes, streams, rivers, wetlands, and beaches) in the state of Michigan that are impaired by E. coli. The goal of the TMDL is to identify problem areas, address sources of E. coli statewide, and provide guidance to restore these waters.

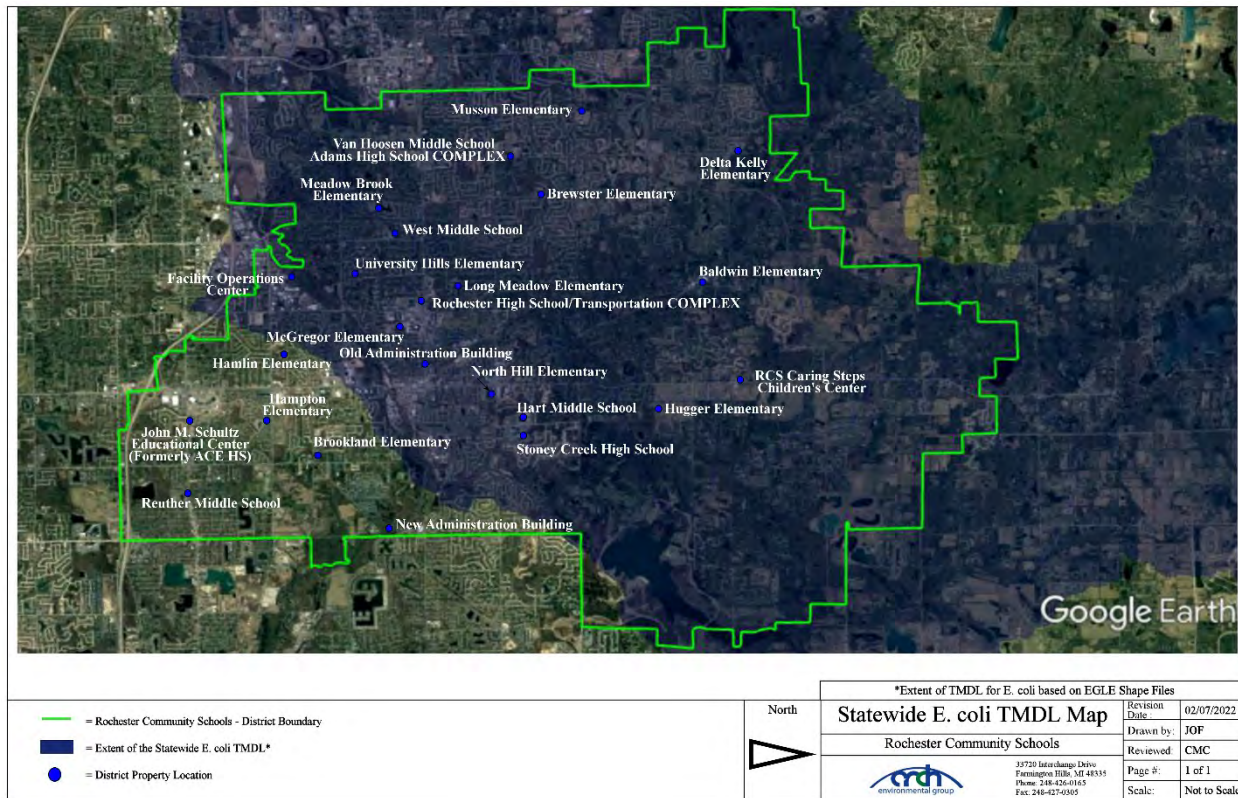
The targets in this TMDL are concentrations of E. coli per 100 milliliters (mL) of water, set equal to Michigan’s Water Quality Standard (WQS) for recreation (described in Section 3). This target is easier to understand and communicate than a load-based target, which would vary by water body, and is also easier to measure with limited resources.

Each District facility was evaluated for the Statewide E. coli TMDL applicability using the Michigan Department of Environment, Great Lakes, and Energy TMDL Watershed Screening Tool. The following District facilities discharge stormwater either directly or indirectly to watersheds included within the Statewide TMDL boundaries as identified in Map 3 below:

1. Adams High School / Van Hoosen Middle School COMPLEX
2. Baldwin Elementary School
3. Brewster Elementary School
4. Caring Steps Children’s Center
5. Delta Kelly Elementary School
6. Facility Operations Center (FOC)
7. Hart Middle School
8. Hugger Elementary School
9. Long Meadow Elementary School
10. McGregor Elementary School
11. Meadow Brook Elementary School
12. Musson Elementary School
13. North Hill Elementary School
14. Old Administration Building
15. Rochester High School / Transportation COMPLEX
16. Stoney Creek High School
17. University Hills Elementary School
18. West Middle School



Map 3 – Total Maximum Daily Load Map<sup>4</sup>



### 4.3 Clinton River TMDL

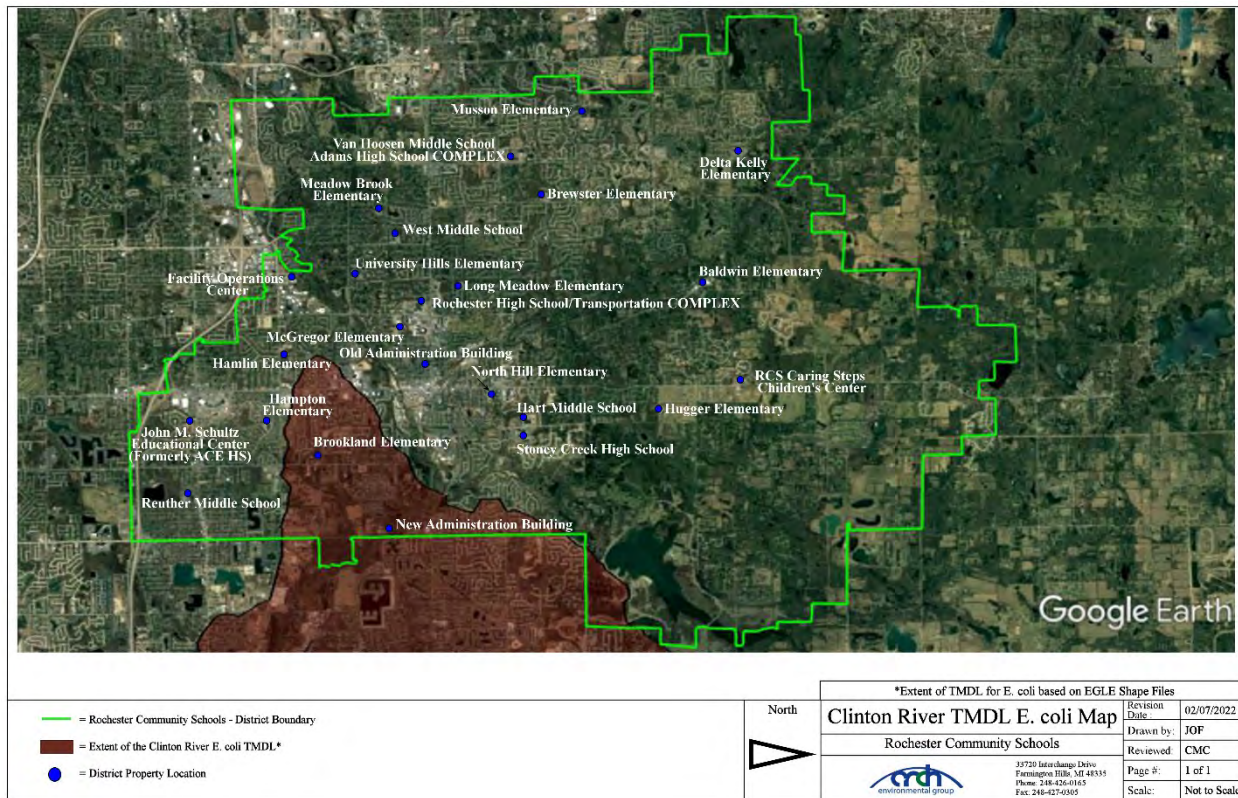
The Clinton River was placed on Section 303(b) placed on the Section 303(d) list due to impairment of recreational uses as indicated by the presence of elevated levels of **E. coli**. Illicit connections and surface runoff are most likely the significant sources of E. coli in the Clinton River watershed. Illicit connections can be a source of E. coli during both wet and dry weather. The watershed is entirely within a highly populated urban area.

The following District facilities discharge stormwater either directly or indirectly within the Clinton River TMDL boundaries as identified in Map 4 below:

1. John M. Schultz Education Center (formerly A.C.E. High School (Alternative Center for Education))
2. New Administration Building

<sup>4</sup> Total maximum daily load boundaries based on Michigan Department of Environment, Great Lakes, and Energy Shapefiles.

Map 4 – Total Maximum Daily Load Map<sup>5</sup>



**4.4 Red Run Drain TMDL**

The Red Run Drain was placed on Section 303(b) placed on the Section 303(d) list due to impairment of recreational uses as indicated by the presence of elevated levels of **E. coli**. Illicit connections, wildlife and/or pet waste, Combined Sewer Overflows (CSO), and nonpoint source run off are the most likely source of E. coli in the Red Run Drain watershed. Illicit connections can be a source of E. coli during both wet and dry weather. The watershed is entirely within a highly populated urban area.

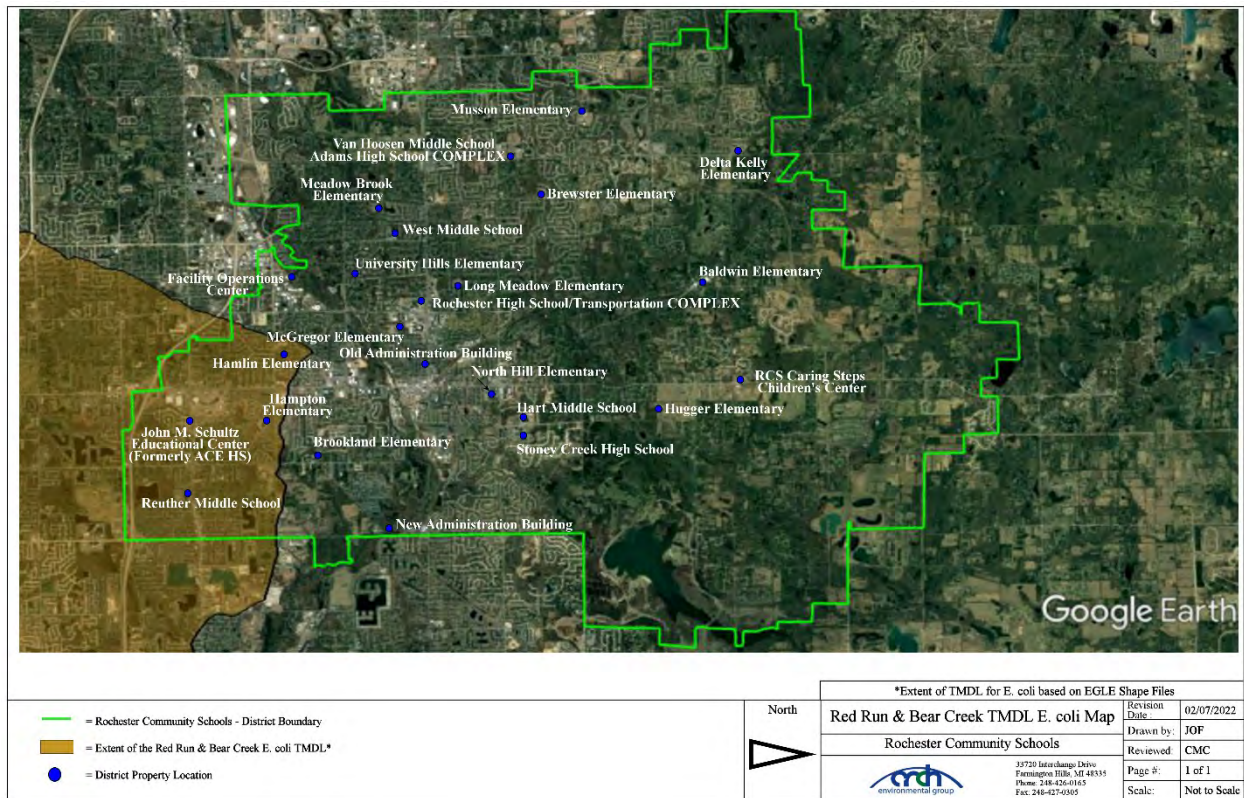
The following District facilities discharge stormwater either directly or indirectly within the Red Run TMDL boundaries as identified in Map 5 below:

1. Brooklands Elementary School / Race Adult Education Building
2. Hamlin Elementary School
3. Hampton Elementary School
4. Reuther Middle School

<sup>5</sup> Total maximum daily load boundaries based on Michigan Department of Environmental Quality Water Quality Standards Shapefiles.



Map 5 – Total Maximum Daily Load Map<sup>6</sup>



**4.5 TMDL Implementation – Monitoring Plan**

**4.5.1 Sampling**

1. The Part 4 Water Quality Standards for E. coli is 1,000 counts per 100 ml for outfall monitoring. If the monitoring results conducted in the initial round of TMDL monitoring are below the benchmark standard for E. coli, then a second round of monitoring for E. coli (within the same permit cycle) is not required.
2. If a designated TMDL in a receiving waterbody to which one or more district facilities discharges is being attained, outfall discharge point monitoring will not be conducted at the district facilities that discharge to that receiving waterbody.

**4.5.2 Prioritized TMDL Best Management Practices**

The below lists stormwater BMPs that are targeted to improve water quality impairments associated by the TMDL.

**E. COLI**

1. Rochester Community Schools will use its website to provide the public with information regarding pet waste (SEMCOG links). Additionally, SEMCOG pet waste posters are placed at various school buildings.
2. Rochester Community Schools will prohibit illicit discharges, inspect, and monitor suspected illicit discharges, and enforce elimination of the illicit discharges and connections.

<sup>6</sup> Total maximum daily load boundaries based on Michigan Department of Environmental Quality Water Quality Standards Shapefiles.

3. Rochester Community Schools has reviewed all facilities for cross-connections between the sanitary and storm sewer systems.
4. Rochester Community Schools will conduct hand sweeping in the parking lots/roadways in the spring and fall.
5. Rochester Community Schools has established programs for soil erosion and sediment control from new or redevelopment construction. Such developments require permits and inspections for practices to keep exposed soils on site or controlled from runoff.
6. Rochester Community Schools has implemented routine visual inspections of stormwater structural controls.
7. Rochester Community Schools will remove excessive sediments from structural sediment removal systems to maintain the maximum designed performance. Sediments will be disposed of offsite in accordance with Parts 115 or 121.

### **ALL TMDLs**

1. Rochester Community Schools will continue to use its website to provide the public information regarding local TMDL issues (phosphorous, E. coli, biota, and dissolved oxygen TMDL Best Management Practice).
2. Rochester Community Schools will continue to educate staff, faculty, and students using various venues including the **“Seven Simple Steps to Clean Water”** program educational materials developed by the various watershed groups specifically related to these issues on the stormwater management webpage.
3. The district has implemented an Illicit Discharge Regulatory Policy.
4. The district has implemented a Post-Construction Policy and Procedure.
5. The district has implemented an Enforcement Response Procedure.
6. Adequately maintains vegetation around stormwater facilities, ditches, and ponds.
7. Provide training to applicable staff and confirm training from contractors including restrictions on the use of phosphorous containing fertilizers, soaps, cleaners, and other chemicals that could impact the separate storm drain system.

### **Procedure**

Prioritization of BMPs is based on Rochester Community Schools targeted TMDL pollutants. Priority is given to BMPs that reduce E. coli loads. If the monitoring results conducted in the initial round of TMDL monitoring for a specific TMDL parameter was below the benchmark standard, then a second round of monitoring (within the same permit cycle) is not required for that specific parameter.

### **Assessment**

The EGLE Stormwater Discharge Permit Application requires a monitoring plan for assessing the effectiveness of the BMPs currently being implemented, or to be implemented, in making progress toward achieving the TMDL pollutant load reduction requirement. Monitoring shall be specifically for the pollutant identified in the TMDL. Monitoring may include wet weather outfall/discharge point monitoring and dry-weather screening. A summary of the monitoring results and conclusions related to TMDLs will be provided during progress reporting.

Rochester Community Schools will conduct the following for applicable TMDLs:

**Rochester Community Schools  
Stormwater Management Program Plan (SWMP)**

1. The goal is to collect samples from at least 50% of the outfall/discharge points at facilities associated with the TMDL. An effort will be made to sample water quality parameters during a representative (i.e., >0.25” and <1.5”) wet weather event over a 24-hour period, and within 30 to 60 minutes of the start of the wet weather event in order to capture the first flush. Monitoring shall be specifically for the pollutant identified in the TMDL. TMDL Sample locations are located in Appendix H.
2. The results of the sampling will be assessed and summarized in a brief assessment report to be shared with the public if requested.
3. Based on a review of the sampling results, BMP implementation will be reviewed for effectiveness and BMPs may be updated or revised to ensure progress toward achieving TMDL pollutant load reductions.

**4.5.3 TMDL - BMP Table**

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
<b>BMP #4.5.3.1 Webpage</b>	The District will use its website to provide the public with information regarding pet waste (SEMCOG links). Additionally, SEMCOG pet waste posters are placed at various school buildings.	Ongoing Throughout Permit Cycle	Posters placed throughout Rochester Community Schools facilities.	Maintain links on webpage. Maintain copies of webpage review.	Rochester Community Schools
	The District will continue to use its website to provide the public information regarding local TMDL issues (E. coli TMDL Best Management Practice).		Material available on webpages.		
<b>BMP #4.5.3.2 Outfall Monitoring</b>	Select outfall/discharge points at facilities associated with the TMDL will be monitored. An effort will be made to sample water quality parameters during a representative wet weather event over a 24-hour period, and within 30 to 60 minutes of the start of the wet weather event in order to capture the first flush. Monitoring shall be specifically for the pollutant identified in the TMDL.	Once per Permit Cycle Throughout Permit Cycle. Second Round as Needed based on Initial Results	The goal is to collect samples from at least 50% of the outfall/points of discharge at facilities associated with the TMDL.	Copy of inspection paperwork and sample results.	Rochester Community Schools
<b>BMP #4.5.3.3 Effectiveness Review</b>	The results of the sampling will be assessed for the effectiveness of the BMPs currently being implemented for TMDL pollutant load reduction and summarized in an assessment report.	Once per Permit Cycle Throughout Permit Cycle	Report available for public review if requested.	Assessment report completed.	Rochester Community Schools

# Appendix A

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

## Receiving Waters Table

Rochester Community Schools				
FACILITY	OUTFALL/DISCHARGE POINT	POINT OF DISCHARGE/OUTFALL	RECEIVING WATERS	WATERSHED
Adams High School & Van Hoosen Middle School COMPLEX	RAV-65.CB.DP	City of Rochester MS4	Paint Creek	Clinton River
Baldwin Elementary School	BDN-04.CB.DP	Oakland County MS4	Paint Creek	Clinton River
	BDN-05.CB.DP	Oakland County MS4	Paint Creek	Clinton River
Brewster Elementary School	BRW-02.DR.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
	BRW-21.OP.OF	Surface Waters of the State	Paint Creek	Clinton River
	BRW-22.SCC.OF	Surface Waters of the State	Paint Creek	Clinton River
Brooklands Elementary School/ Race Adult Education Building	BLK-18.MH.DP	City of Rochester Hills MS4	Gibson Drain-Plum Brook	Clinton River
	BLK-22.SCC.DP	City of Rochester Hills MS4	Gibson Drain-Plum Brook	Clinton River
Caring Steps Children's Center	CSC-04.OP.OF	Surface Waters of the State	West Branch Stony Creek	Clinton River
	CSC-08.OP.OF	Surface Waters of the State	West Branch Stony Creek	Clinton River
Delta Kelly Elementary School	DLK-15.OP.OF	Surface Waters of the State	Unnamed Tributary of Paint Creek	Clinton River
	DLK-16.OP.OF	Surface Waters of the State	Unnamed Tributary of Paint Creek	Clinton River
Facilities Operation Center	FOC-23.OP.OF	Surface Waters of the State	Galloway Creek	Clinton River
	FOC-24.OP.OF	Surface Waters of the State	Galloway Creek	Clinton River
Hamlin Elementary School	HML-09.OP.OF	Surface Waters of the State	Gibson Drain-Plum Brook	Clinton River
	HML-24.OP.OF	Surface Waters of the State	Gibson Drain-Plum Brook	Clinton River
Hampton Elementary School	HPT-13.MH.DP	City of Rochester Hills MS4	Gibson Drain-Plum Brook	Clinton River
Hart Middle School	HRT-21.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
	HRT-52.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
	HRT-56.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
	HRT-58.OP.OF	City of Rochester Hills MS4	Unnamed Tributary of Stoney Creek	Clinton River
	HRT-59.CB.DP	City of Rochester Hills MS4	Stoney Creek	Clinton River
Hugger Elementary School	None	N/A	N/A	Clinton River
John M. Schultz Educational Center (Formerly Alternative Center for Education High School)	ACE-14.SCC.DP	City of Rochester MS4	Cranberry Marsh Drain	Clinton River
	ACE-27.MH.DP	City of Rochester MS4	Cranberry Marsh Drain	Clinton River



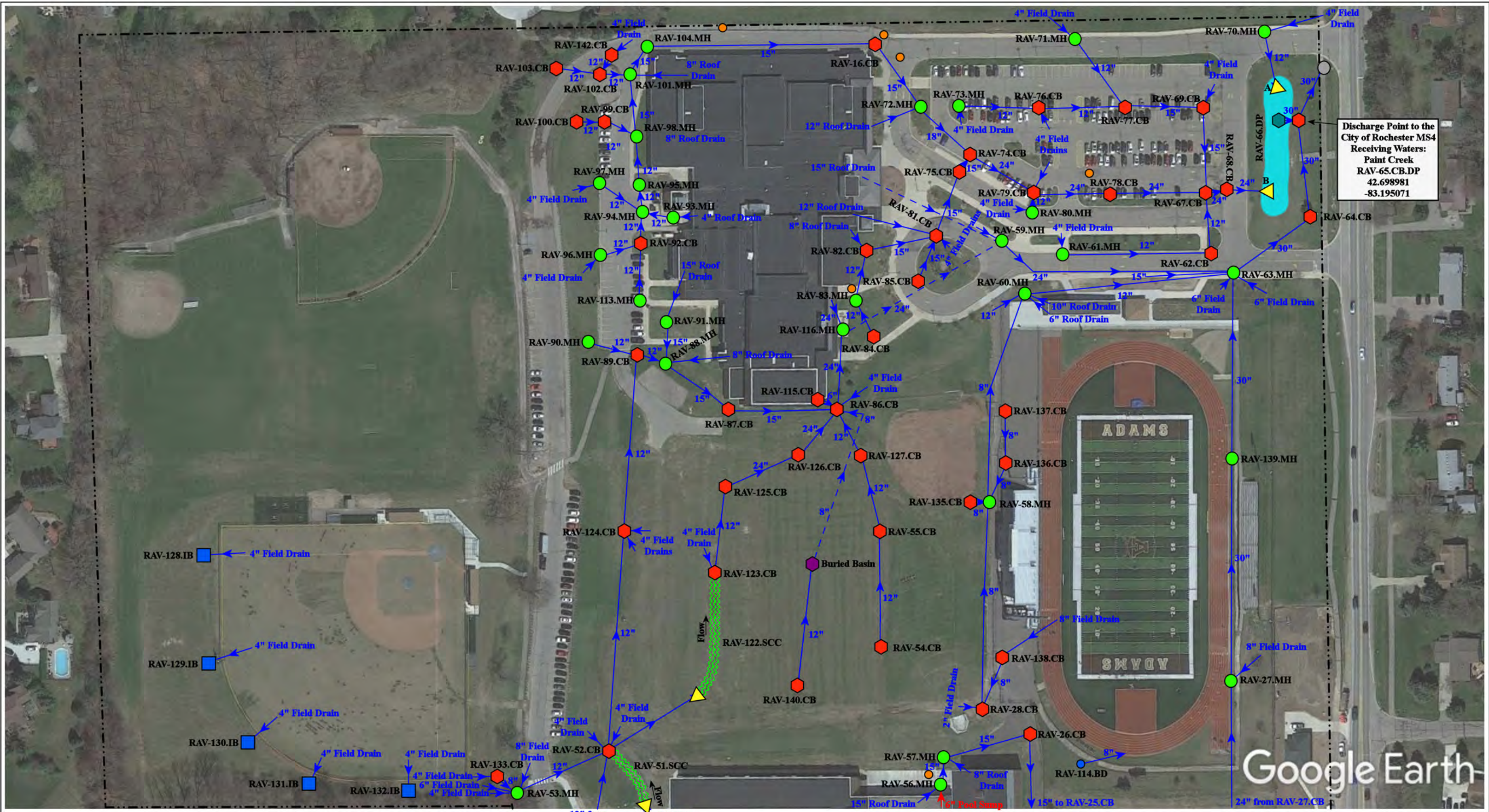
## Receiving Waters Table

Rochester Community Schools				
FACILITY	OUTFALL/DISCHARGE POINT	POINT OF DISCHARGE/OUTFALL	RECEIVING WATERS	WATERSHED
<b>Long Meadow Elementary School</b>	LMW-01.OP.OF	Surface Waters of the State	Paint Creek	Clinton River
	LMW-14.SCC.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
	LMW-15.CB.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
	LMW-16.MH.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
	LMW-37.CB.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
<b>McGregor Elementary School</b>	MCG-03.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	MCG-10.CB.DP	City of Rochester MS4	Galloway Creek	Clinton River
<b>Meadow Brook Elementary School</b>	MBE-05.MH.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
<b>Musson Elementary School</b>	MSN-13.OP.DP	Oakland County MS4	Paint Creek	Clinton River
	MSN-18.SO.DP	Oakland County MS4	Paint Creek	Clinton River
<b>New Administration Building</b>	NAB-04.CB.DP	City of Rochester MS4	Cranberry Marsh Drain	Clinton River
	NAB-24.OP.OF	City of Rochester MS4	Cranberry Marsh Drain	Clinton River
<b>North Hill Elementary School</b>	NHE-07.MH.DP	City of Rochester Hills MS4	Paint Creek	Clinton River
	NHE-34.OP.DP	City of Rochester Hills MS4	Stony Creek	Clinton River
<b>Old Administration Building</b>	RAB-12.MH.DP	City of Rochester MS4	Paint Creek	Clinton River
	RAB-15.MH.DP	City of Rochester MS4	Paint Creek	Clinton River
<b>Reuther Middle School</b>	RTR-22.MH.DP	City of Rochester MS4	Gibson Drain-Plum Brook	Clinton River
<b>Rochester High School / Transportation Facility COMPLEX</b>	RHS-10.CB.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-14.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-25.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-26.CB.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-30.CB.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-32.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-36.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-63.MH.DP	City of Rochester MS4	Paint Creek	Clinton River
	RHS-68.DR.DP	City of Rochester MS4	Paint Creek	Clinton River
	RHS-70.SO.DP	City of Rochester MS4	Paint Creek	Clinton River
	RHS-93.MH.DP	City of Rochester MS4	Galloway Creek	Clinton River
	RHS-133.MH.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River

## Receiving Waters Table

Rochester Community Schools				
FACILITY	OUTFALL/DISCHARGE POINT	POINT OF DISCHARGE/OUTFALL	RECEIVING WATERS	WATERSHED
<b>Stoney Creek High School</b>	SCR-02.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
	SCR-24.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
	SCR-80.OP.OF	Surface Waters of the State	Unnamed Tributary of Stoney Creek	Clinton River
<b>University Hills Elementary School</b>	UVL-02.MH.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
	UVL-20.MH.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
	UVL-22.SCC.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
<b>West Middle School</b>	WET-13.SO.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
	WET-37.OP.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River
	WET-38.OP.DP	City of Rochester Hills MS4	Galloway Creek	Clinton River





Discharge Point to the City of Rochester MS4 Receiving Waters: Paint Creek  
 RAV-65.CB.DP  
 42.698981  
 -83.195071

Google Earth

- ⬡ = Catch basin
- = Manhole
- = Infiltration Basin
- = Basin Drain
- = Sanitary
- ▲ = Open Pipe Outlet
- = Detention Pond
- 〰 = Stormwater Conveyance Channel
- = Offsite MS4



3200 W Tienken Rd, Rochester Hills, MI 48306 - 1339 Adams Rd, Rochester Hills, MI 48306	
Adams High School & VanHoosen Middle School	Revision Date: 08/15/2022
Rochester Community Schools	Drawn by: CJ
	Reviewed: SR
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Page #: 1 of 2
	Scale: Not to Scale





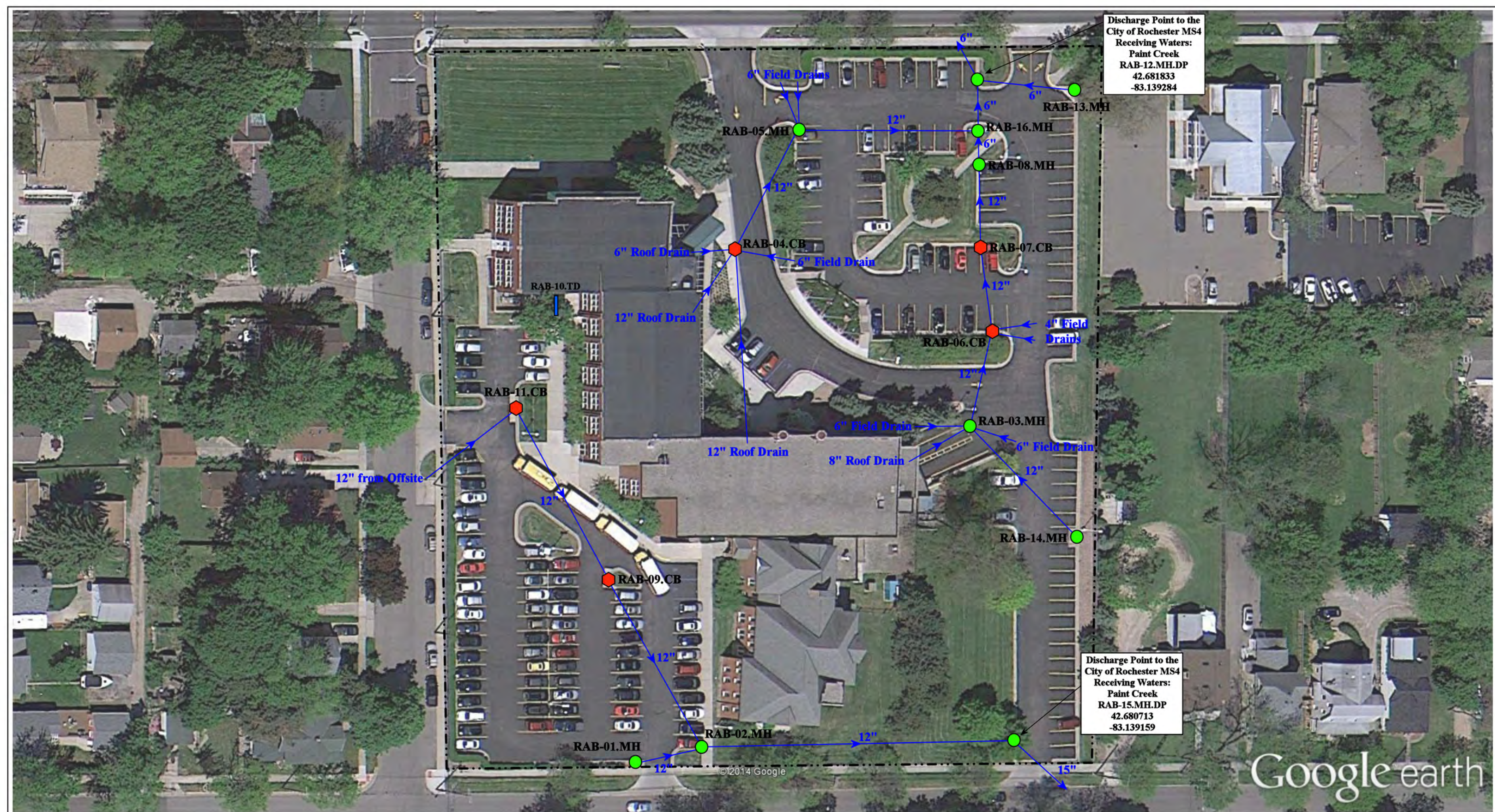
Google Earth

- ◆ = Catch Basin
- = Manhole
- ◆ = Buried Basin
- = Access Port
- = Sanitary Sewer
- = Infiltration Basin
- = Basin Drain
- = Trench Drain
- ▬ = Underground Detention System



3200 W Tienken Rd, Rochester Hills, MI 48306 -1339 Adams Rd, Rochester Hills, MI 48306	
Adams High School & VanHoosen Middle School	Revision Date : 08/15/2022
Rochester Community Schools	Drawn by: CJ
	Reviewed: SR
<small>37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</small>	Page #: 2 of 2
	Scale: Not to Scale





Discharge Point to the City of Rochester MS4  
Receiving Waters:  
Paint Creek  
RAB-12.MH.DP  
42.681833  
-83.139284

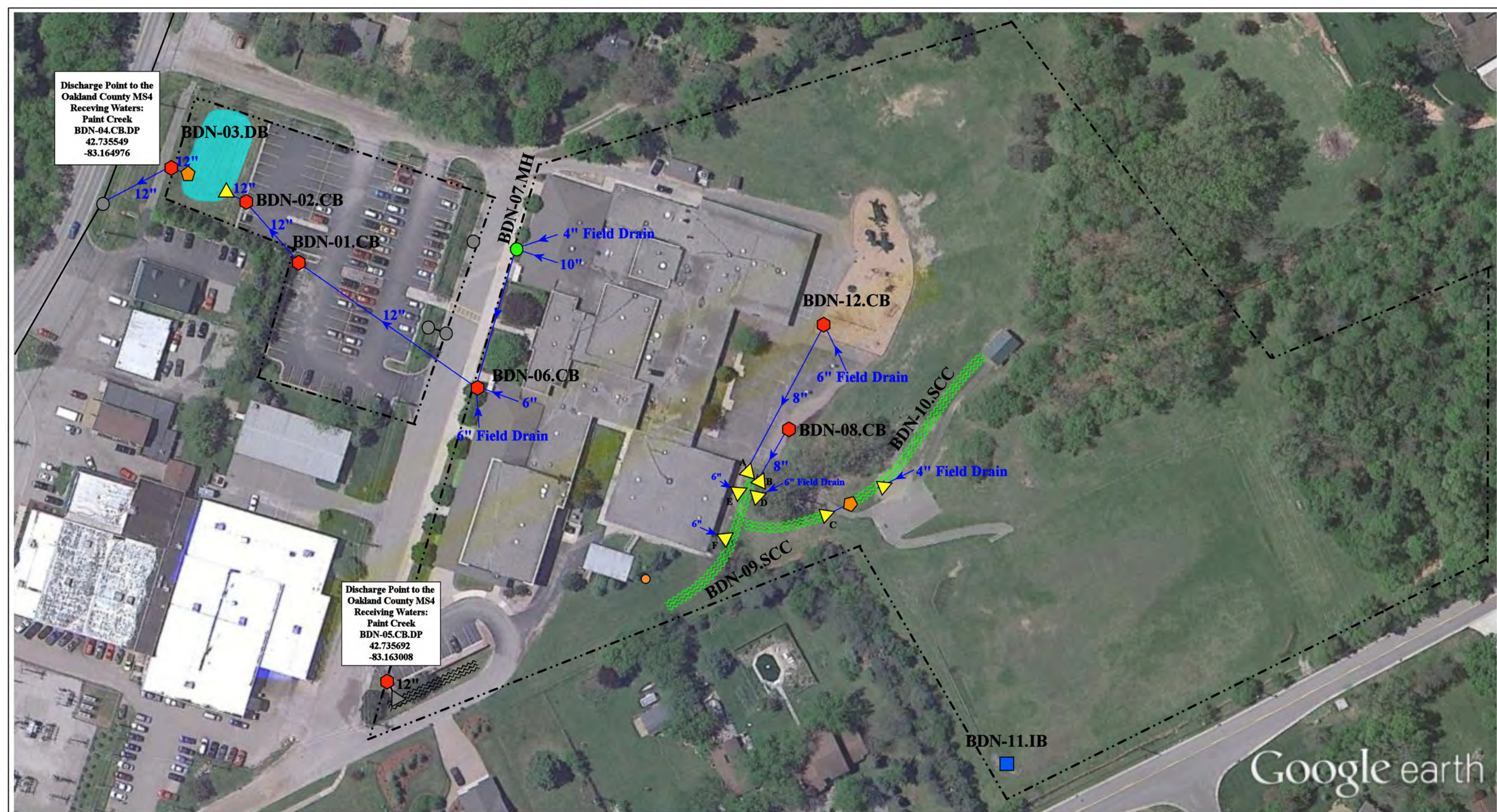
Discharge Point to the City of Rochester MS4  
Receiving Waters:  
Paint Creek  
RAB-15.MH.DP  
42.680713  
-83.139159

- ◆ = Catch Basin
- = Manhole
- = Trench Drain



501 West University Drive, Rochester MI 48307	
<b>Old Administration Building</b>	Revision Date: 09/05/2019
Rochester Community School District	Drawn by: JOF
	Reviewed: CMC
	Page #: 1 of 1
	Scale: Not to Scale
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	



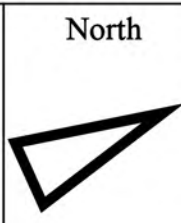


Discharge Point to the  
Oakland County MS4  
Receiving Waters:  
Paint Creek  
BDN-04.CB.DP  
42.735549  
-83.164976

Discharge Point to the  
Oakland County MS4  
Receiving Waters:  
Paint Creek  
BDN-05.CB.DP  
42.735692  
-83.163008

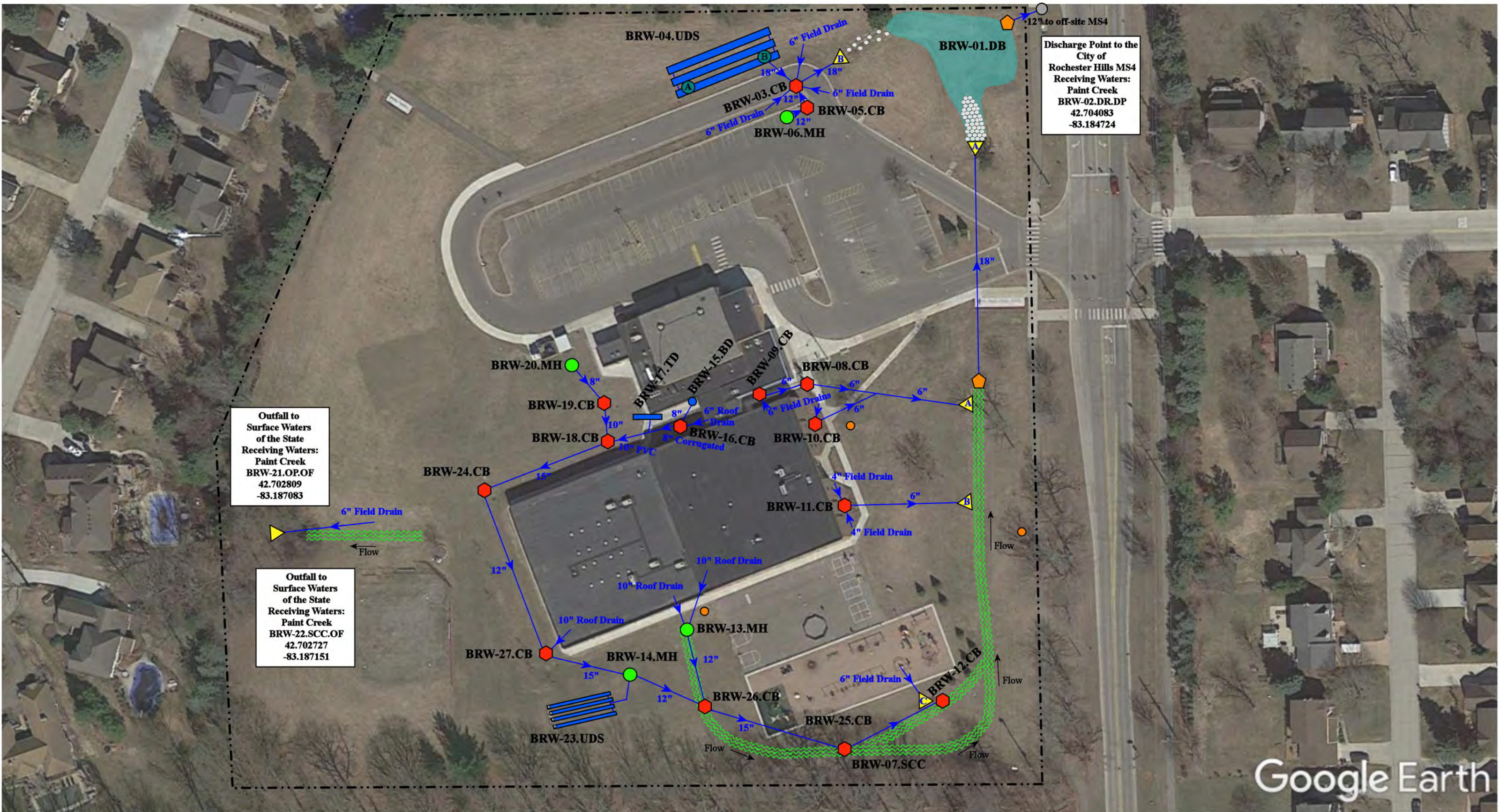
Google earth

= Catch Basin	= Infiltration Basin	= Buried Structure	= Pond/Basin
= Manhole	= Open Pipe Outlet	= Stabilized Outlet	= Swale/Stormwater Conveyance Channel
= Basin Drain	= Drainage Receptor	= Flow Splitter	= Underground Detention System
= Offsite MS4	= Trench Drain	= Hydrodynamic Separator	
= Sanitary	= Property Lines		



4325 Bannister Road. Rochester, MI 48306	
<b>Baldwin Elementary School</b>	
Rochester Community Schools	
	37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305
Revision Date :	07/20/2022
Drawn by:	CMC
Reviewed:	BJZ
Page #:	1 of 1
Scale:	Not to Scale





Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Paint Creek  
 BRW-02.DR.DP  
 42.704083  
 -83.184724

Outfall to Surface Waters of the State  
 Receiving Waters:  
 Paint Creek  
 BRW-21.OP.OF  
 42.702809  
 -83.187083

Outfall to Surface Waters of the State  
 Receiving Waters:  
 Paint Creek  
 BRW-22.SCC.OF  
 42.702727  
 -83.187151

Google Earth

1535 Brewster Rd, Rochester Hills, MI 48306

# Brewster Elementary School

Rochester Community Schools



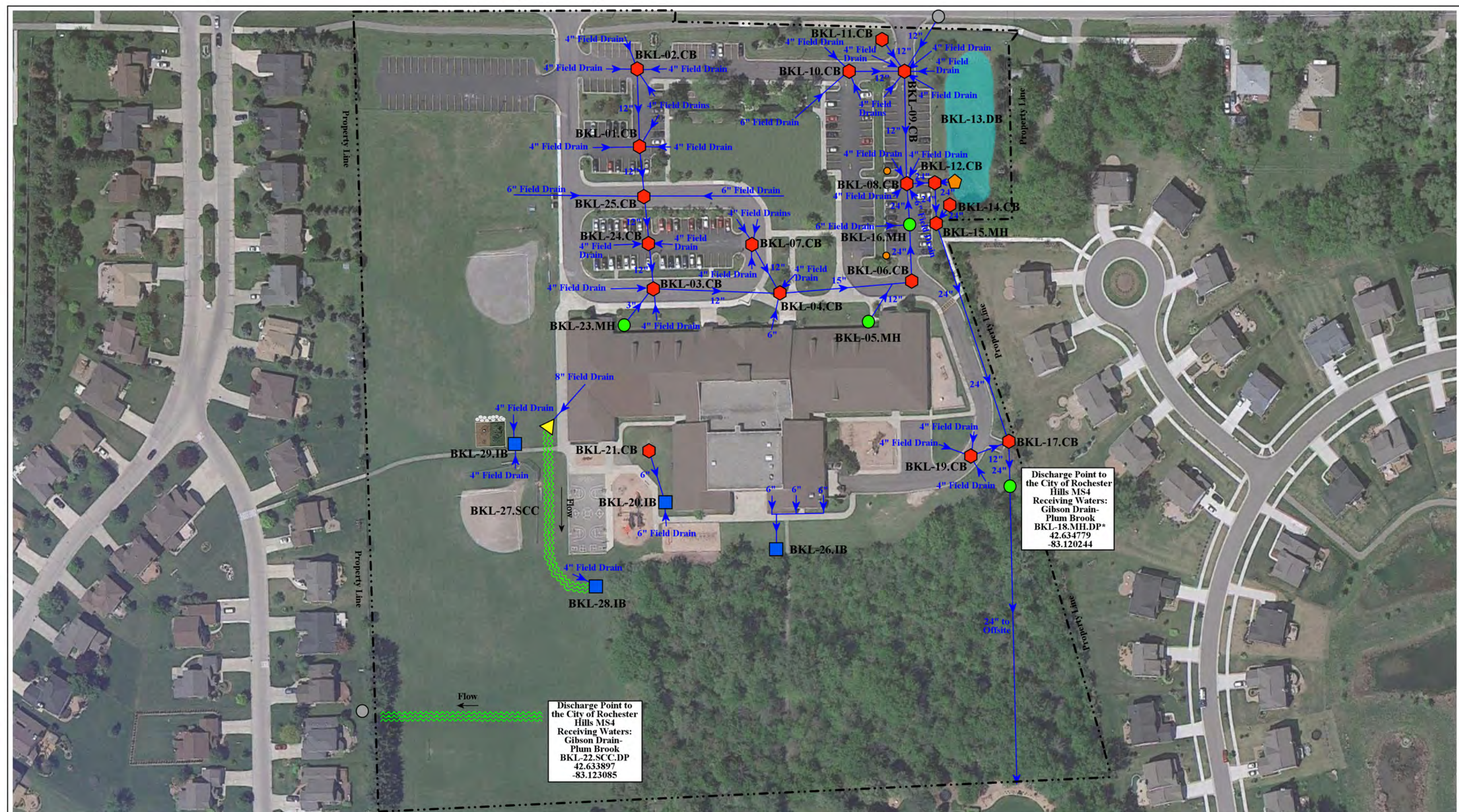
37720 Interchange Drive  
 Farmington Hills, MI 48335  
 Phone: 248-426-0165  
 Fax: 248-427-0305

- = Catch Basin
- = Infiltration Basin
- = Buried Structure
- = Pond/Basin
- = Manhole
- ▲ = Open Pipe Outlet
- = Stabilized Outlet
- ~ = Swale/Stormwater Conveyance Channel
- = Basin Drain
- ◆ = Drainage Receptor
- = Flow Splitter
- = Underground Detention System
- = Offsite MS4
- = Trench Drain
- = Hydrodynamic Separator
- = Sanitary
- - - = Property Lines



Revision Date:	4/13/2022
Drawn by:	MRW
Reviewed:	KEM
Page #:	1 of 1
Scale:	Not to Scale





Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Gibson Drain-  
 Plum Brook  
 BKL-18.MH.DP\*  
 42.634779  
 -83.120244

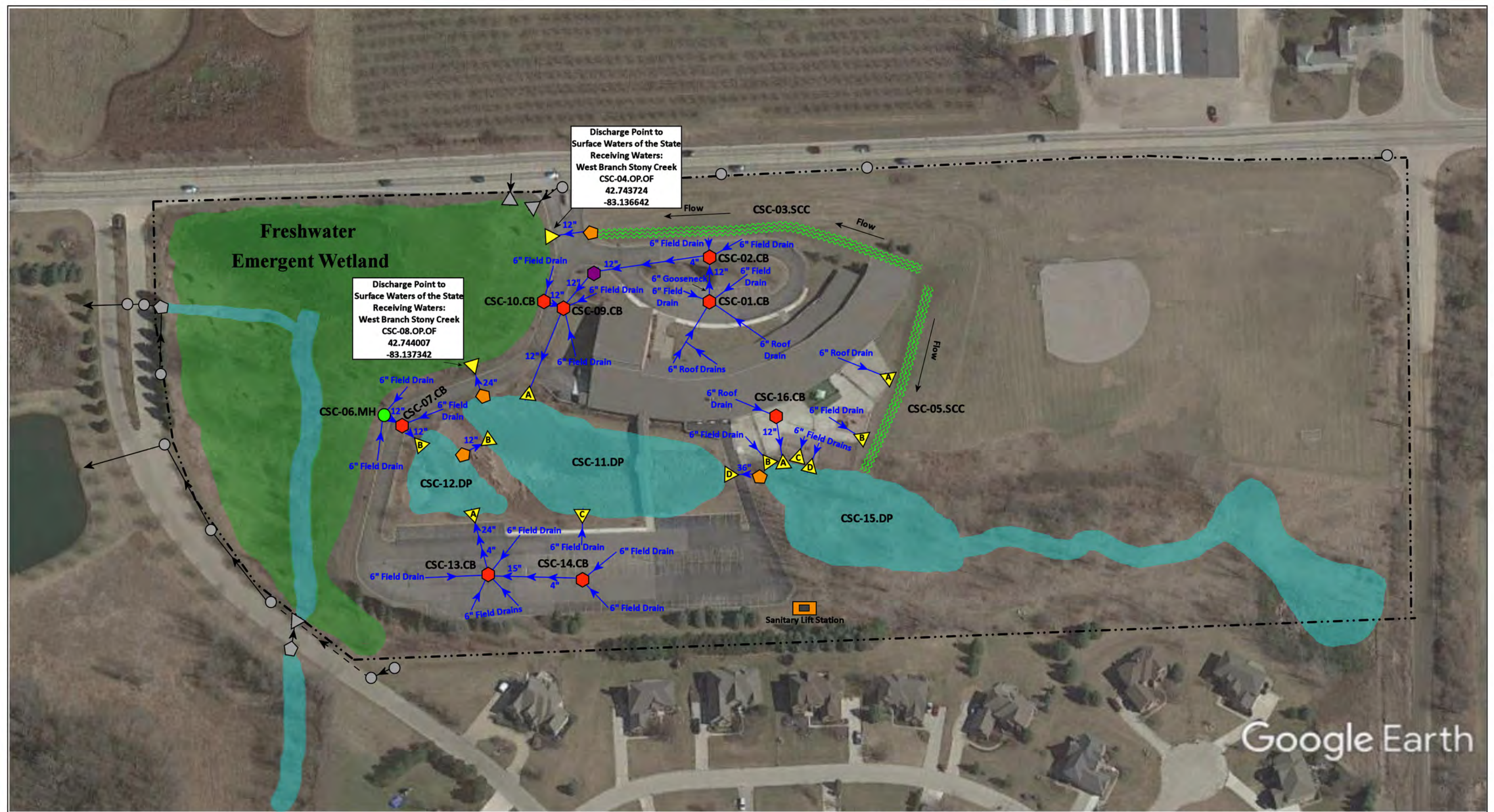
Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Gibson Drain-  
 Plum Brook  
 BKL-22.SCC.DP  
 42.633897  
 -83.123085

- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- = Trench Drain
- = Property Lines
- = Buried Structure
- = Stabilized Outlet
- = Flow Splitter
- \*
- = TMDL Sample Location
- = Pond/Basin
- ~ = Swale/Stormwater Conveyance Channel
- = Underground Detention System



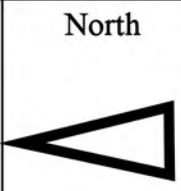
<b>Brooklands Elementary School/ Race Adult Education Building</b>		Revision Date: 02/22/2023
Rochester Community Schools	490 E. Auburn Road Rochester Hills, MI 48307	Drawn by: AS
		Reviewed: LK
<small>37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</small>		Page #: 1 of 1
		Scale: Not to Scale





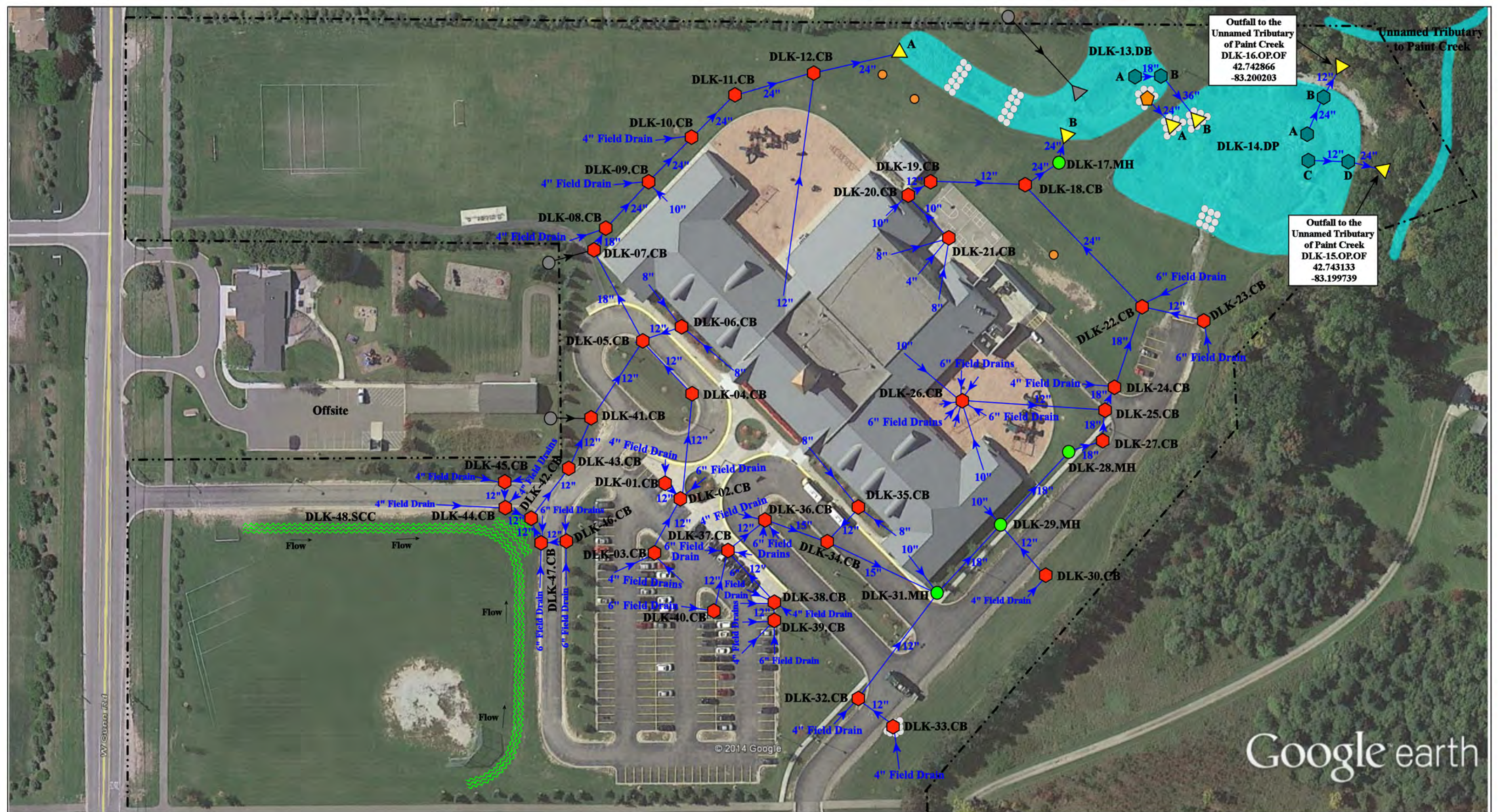
Google Earth

- = Property Lines
- = Manhole
- ▲ = Open Pipe Outlet
- ◆ = Drainage Receptor
- ◆ = Catch Basin
- ≡ = Stormwater Conveyance Channel
- = Detention Ponds / Stream
- ◆ = Buried Structure



3838 Rochester Road, Rochester, MI 48306	
<b>Caring Steps Children's Center</b>	Revision Date: 02/08/2021
Rochester Community Schools	Drawn by: JK
	Reviewed: BK
	Page #: 1 of 1
	Scale: Not to Scale
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	





<ul style="list-style-type: none"> <li><span style="color: red;">●</span> = Catch Basin</li> <li><span style="color: green;">●</span> = Manhole</li> <li><span style="color: blue;">●</span> = Basin Drain</li> <li><span style="color: grey;">●</span> = Offsite MS4</li> <li><span style="color: orange;">●</span> = Sanitary</li> <li><span style="color: blue;">■</span> = Infiltration Basin</li> <li><span style="color: yellow;">▲</span> = Open Pipe Outlet</li> <li><span style="color: orange;">▲</span> = Drainage Receptor</li> <li><span style="color: blue;">—</span> = Trench Drain</li> <li><span style="border-bottom: 1px dashed black;">---</span> = Property Lines</li> <li><span style="color: purple;">◆</span> = Buried Structure</li> <li><span style="color: teal;">◆</span> = Stabilized Outlet</li> <li><span style="border: 1px solid black; border-radius: 50%; padding: 2px;"> </span> = Flow Splitter</li> <li><span style="color: blue;">⊗</span> = Hydrodynamic Separator</li> <li><span style="color: cyan;">■</span> = Pond/Basin</li> <li><span style="color: green;">~</span> = Swale/Stormwater Conveyance Channel</li> <li><span style="color: blue;">▬</span> = Underground Detention System</li> </ul>				<p>North</p>	<p>3880 Adams Road, Oakland Charter Twp., Michigan 48363</p> <h2 style="margin: 0;">Delta Kelly Elementary School</h2> <p style="margin: 0;">Rochester Community Schools</p>		<p>Revision Date: 06/21/2022</p> <p>Drawn by: CMC</p> <p>Reviewed: BJZ</p> <p>Page #: 1 of 1</p> <p>Scale: Not to Scale</p>
<p style="font-size: x-small;">© 2014 Google</p>			<p style="font-size: x-small;">37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</p>				





= Catch Basin	= Infiltration Basin	= Buried Structure	= Pond/Basin
= Manhole	= Open Pipe Outlet	= Stabilized Outlet	= Swale/Stormwater Conveyance Channel
= Basin Drain	= Drainage Receptor	= Flow Splitter	= Underground Detention System
= Offsite MS4	= Trench Drain	= Hydrodynamic Separator	
= Sanitary	= Property Lines		

1402 W. Hamlin Road, Rochester Hills, MI 48309

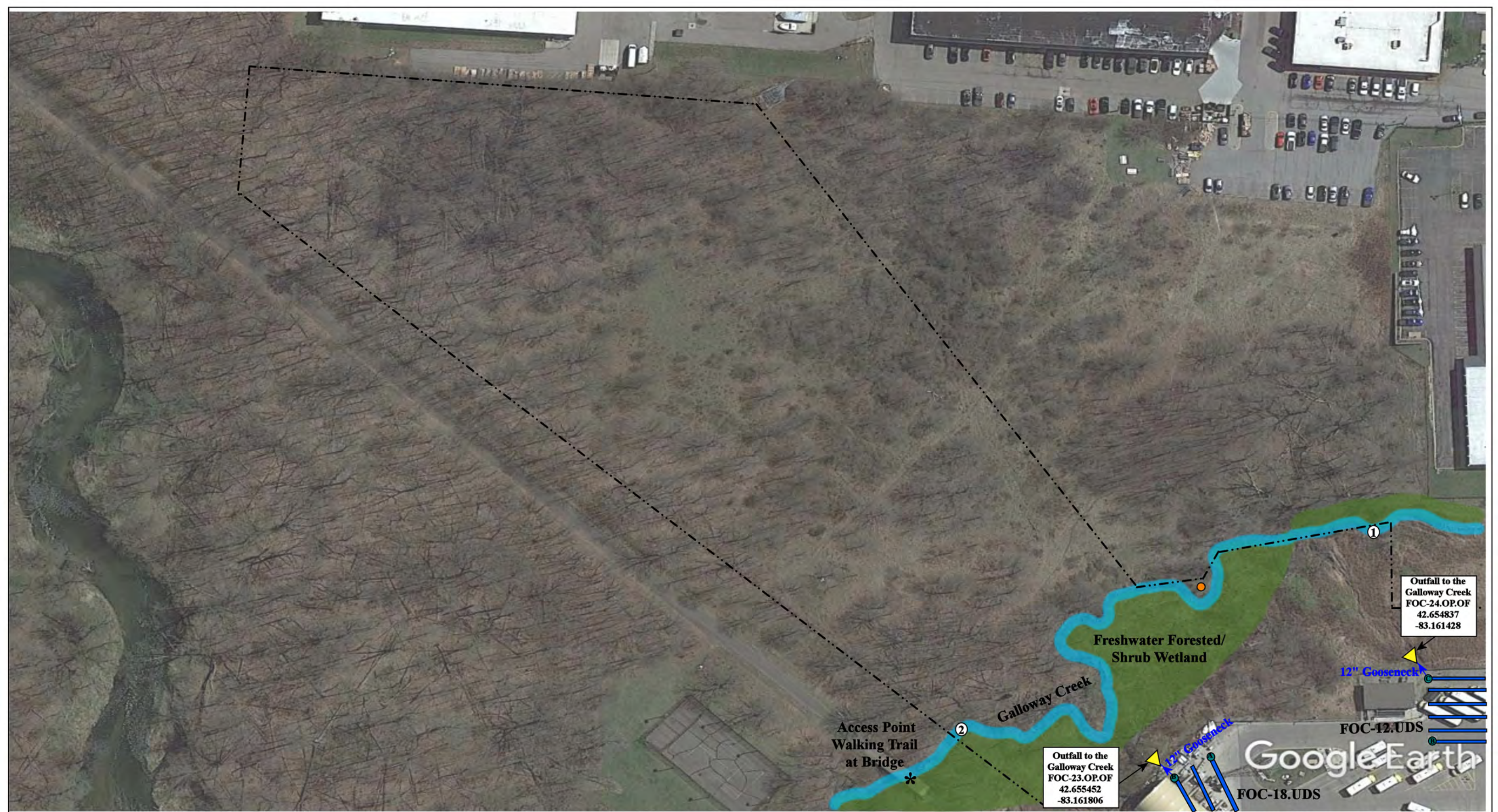
**Facility and Operations Center**

Rochester Community Schools

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

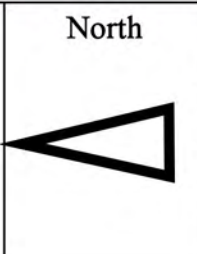
Revision Date:	10/28/2022
Drawn by:	WM
Reviewed:	LK
Page #:	1 of 2
Scale:	Not to Scale





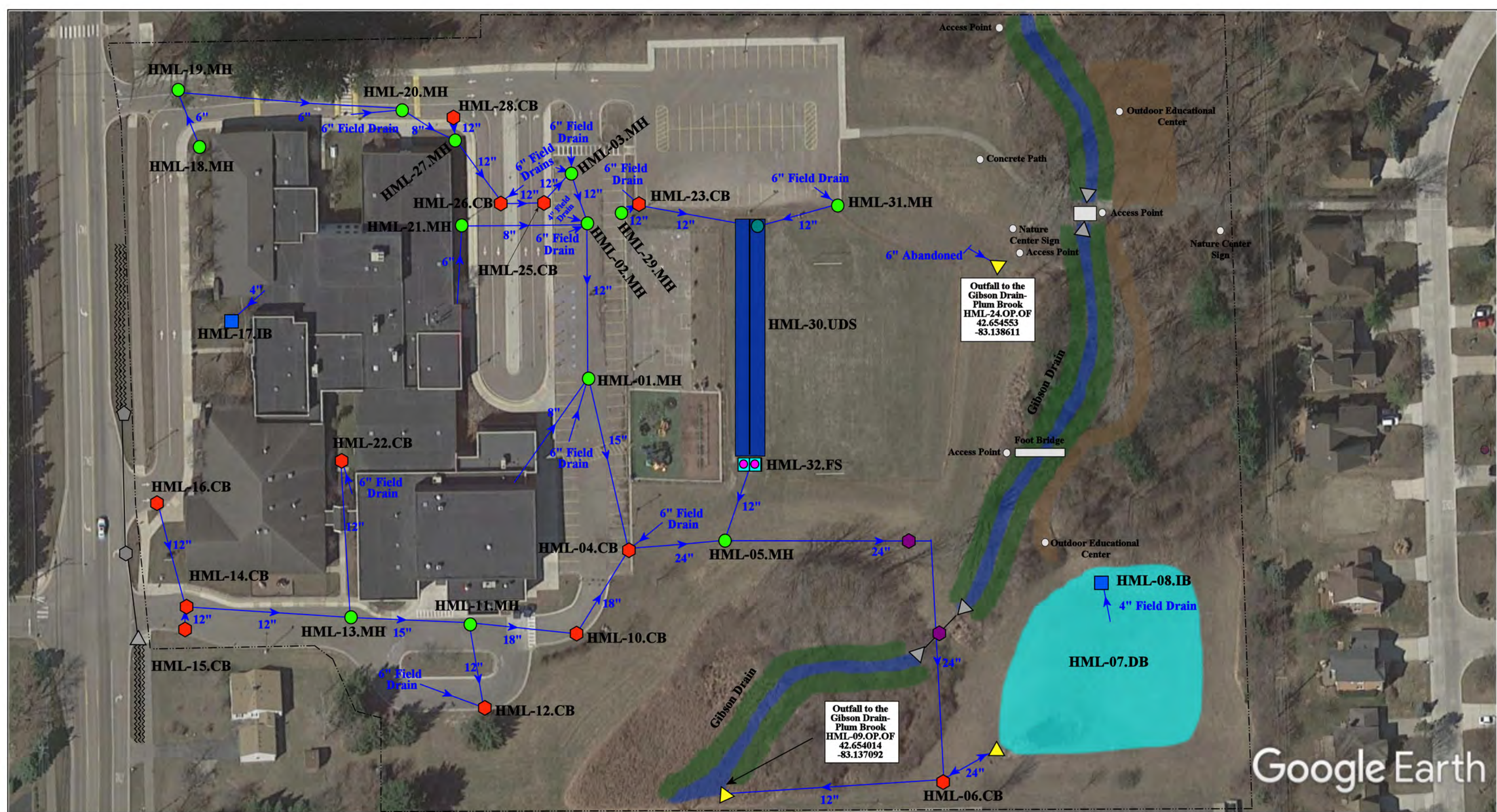
1402 W. Hamlin Road, Rochester Hills, MI 48309

- |               |                      |                          |                                       |
|---------------|----------------------|--------------------------|---------------------------------------|
| = Catch Basin | = Infiltration Basin | = Buried Structure       | = Pond/Basin                          |
| = Manhole     | = Open Pipe Outlet   | = Stabilized Outlet      | = Swale/Stormwater Conveyance Channel |
| = Basin Drain | = Drainage Receptor  | = Flow Splitter          | = Underground Detention System        |
| = Offsite MS4 | = Trench Drain       | = Hydrodynamic Separator |                                       |
| = Sanitary    | = Property Lines     |                          |                                       |



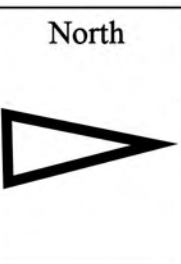
<h2>Facility and Operations Center</h2> <p>Rochester Community Schools</p>	Revision Date :	10/28/2022
	Drawn by:	WM
<p>37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</p>	Reviewed:	LK
	Page #:	2 of 2
	Scale:	Not to Scale





270 W. Hamlin Road, Rochester Hills, MI 48307

- ◆ = Catch Basin
- = Manhole
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ◆ = Buried Structure
- ◆ = Stabilized Outlet
- = Pond/Basin
- = Swale/Stormwater
- = Basin Drain
- ◆ = Drainage Receptor
- ▲ = Flow Splitter
- ▲ = Hydrodynamic Separator
- = Offsite MS4
- ▬ = Trench Drain
- ▬ = Conveyance Channel
- ▬ = Underground Detention System
- = Sanitary
- = Property Lines



## Hamlin Elementary School

Rochester Community Schools



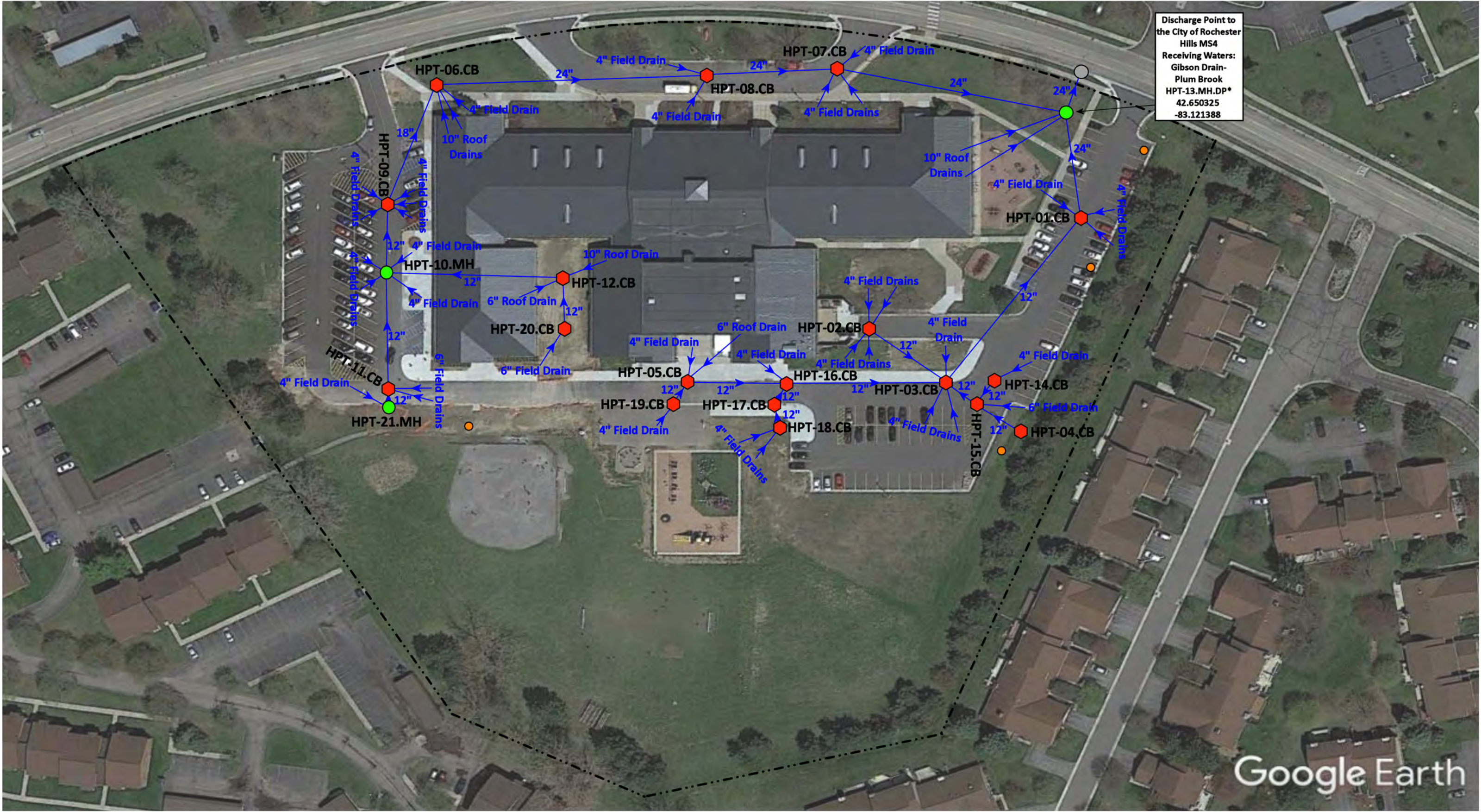
37720 Interchange Drive  
Farmington Hills, MI 48335  
Phone: 248-426-0165  
Fax: 248-427-0305

Revision Date :	01/26/2023
Drawn by:	KEM
Reviewed:	JP
Page #:	1 of 1
Scale:	Not to Scale

Google Earth



Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Gibson Drain-Plum Brook  
 HPT-13.MH.DP\*  
 42.650325  
 -83.121388



Google Earth

530 Hampton Circle, Rochester Hills, Michigan 48307

# Hampton Elementary School

Rochester Community Schools



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

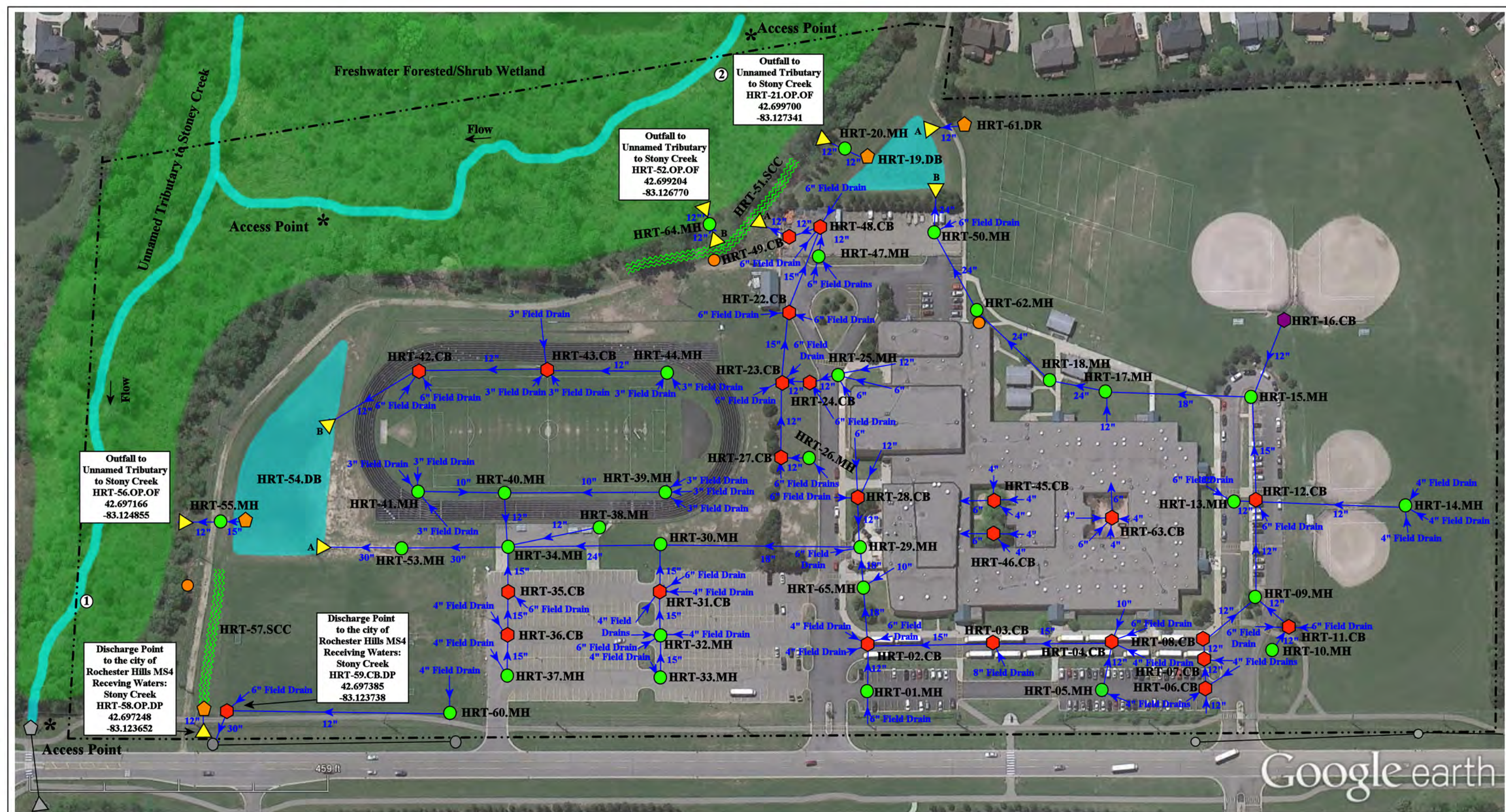
- - - - = Property Line
- 🔴 = Catch Basin
- 🟢 = Manhole

- = Offsite MS4
- \* = TMDL Sampling Location
- = Sanitary



Revision Date:	12/3/2021
Drawn by:	KD
Reviewed:	LE
Page #:	1 of 1
Scale:	Not to Scale

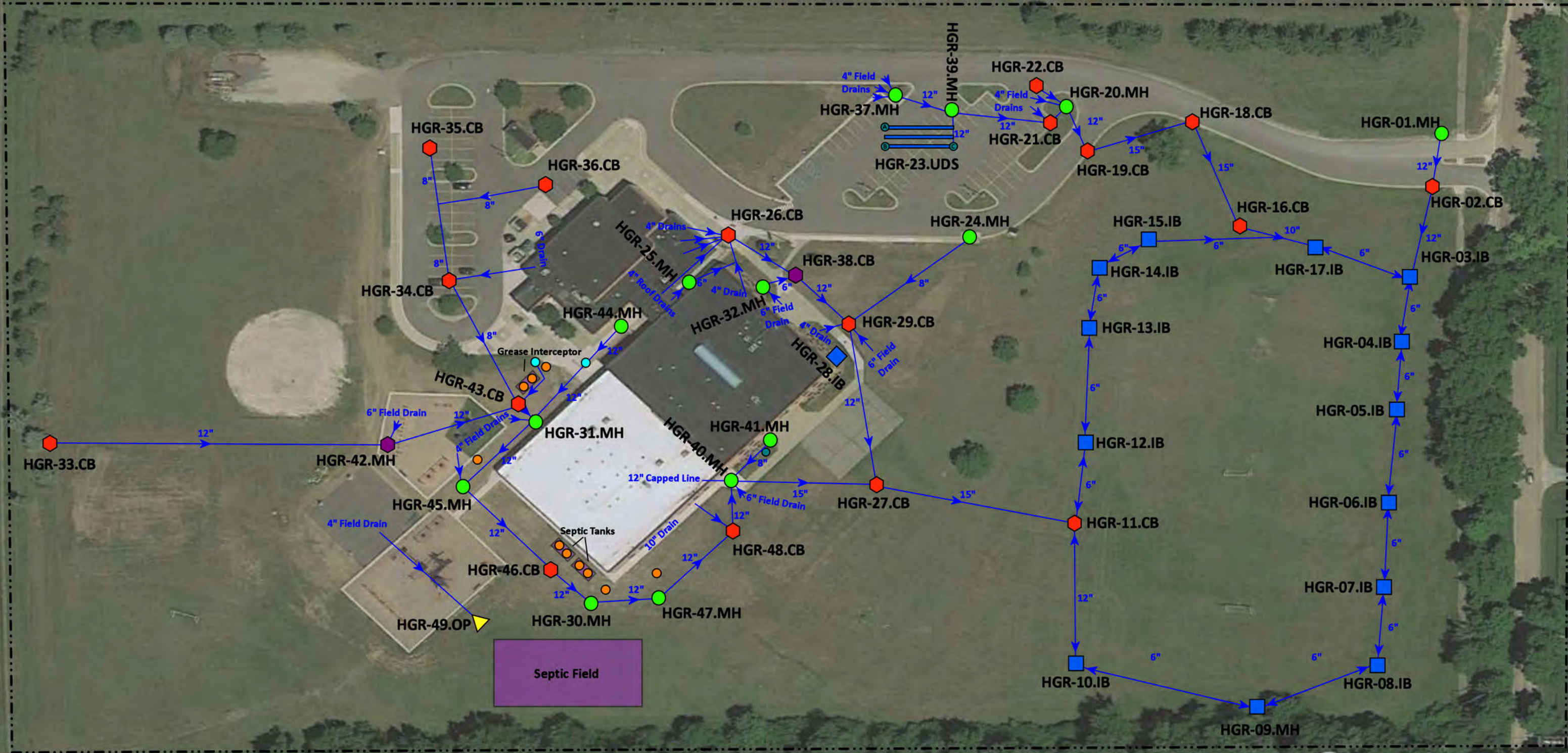




- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- = Trench Drain
- = Property Lines
- = Buried Structure
- = Stabilized Outlet
- = Flow Splitter
- ⊙ = Hydrodynamic Separator
- = Pond/Basin
- ▨ = Swale/Stormwater Conveyance Channel
- ▨ = Underground Detention System

6500 Sheldon Rd, Rochester Hills, MI 48306			
	<b>Hart Middle School</b>	Revision Date:	11/01/2022
	Rochester Community Schools	Drawn by:	AS
	33720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Reviewed:	AP
		Page #:	1 of 1
		Scale:	Not to scale





Google Earth

5050 Sheldon Rd, Rochester, MI 48306

### Hugger Elementary School

Rochester Community Schools



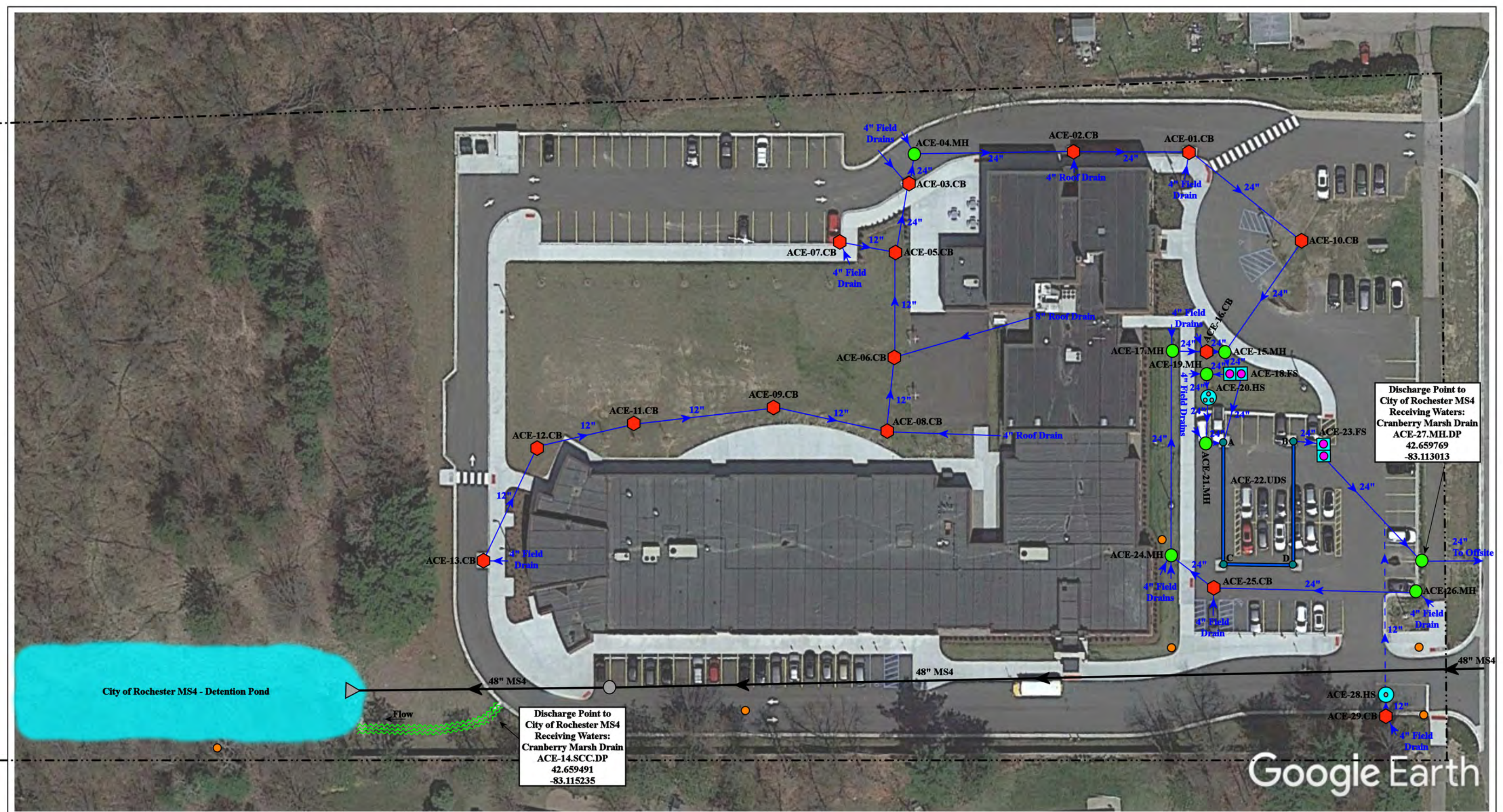
37720 Interchange Drive  
Farmington Hills, MI 48335  
Phone: 248-426-0165  
Fax: 248-427-0305



- ◆ = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- = Trench Drain
- - - = Property Lines
- ◆ = Buried Structure
- ◆ = Stabilized Outlet
- ◆ = Flow Splitter
- = Hydrodynamic Separator
- = Pond/Basin
- ~ = Swale/Stormwater
- = Conveyance Channel
- ≡ = Underground Detention System

Revision Date :	06/27/2022
Drawn by:	SMR
Reviewed:	ANP
Page #:	1 of 1
Scale:	Not to Scale





Discharge Point to City of Rochester MS4 Receiving Waters: Cranberry Marsh Drain  
 ACE-27.MH.DP  
 42.659769  
 -83.113013

Discharge Point to City of Rochester MS4 Receiving Waters: Cranberry Marsh Drain  
 ACE-14.SCC.DP  
 42.659491  
 -83.115235

Google Earth

- ◆ = Catch Basin
- = Manhole
- = MS4 Catch Basin
- ▲ = MS4 Open PipeOutlet
- = Sanitary

- ~ = Stormwater Conveyance Channel
- = Underground Detention System
- = Hydrodynamic Separator (1 Lid)
- = Hydrodynamic Separator (3 Lids)
- = Flow Splitter



1440 John R Road, Rochester, MI 48307	
John M. Schultz Educational Center (Formerly Alternative Center for Education High School)	
Rochester Community Schools	
	Revision Date: 01/11/2021
	Drawn by: AS
	Reviewed: SR
	Page #: 1 of 2
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Scale: Not to Scale

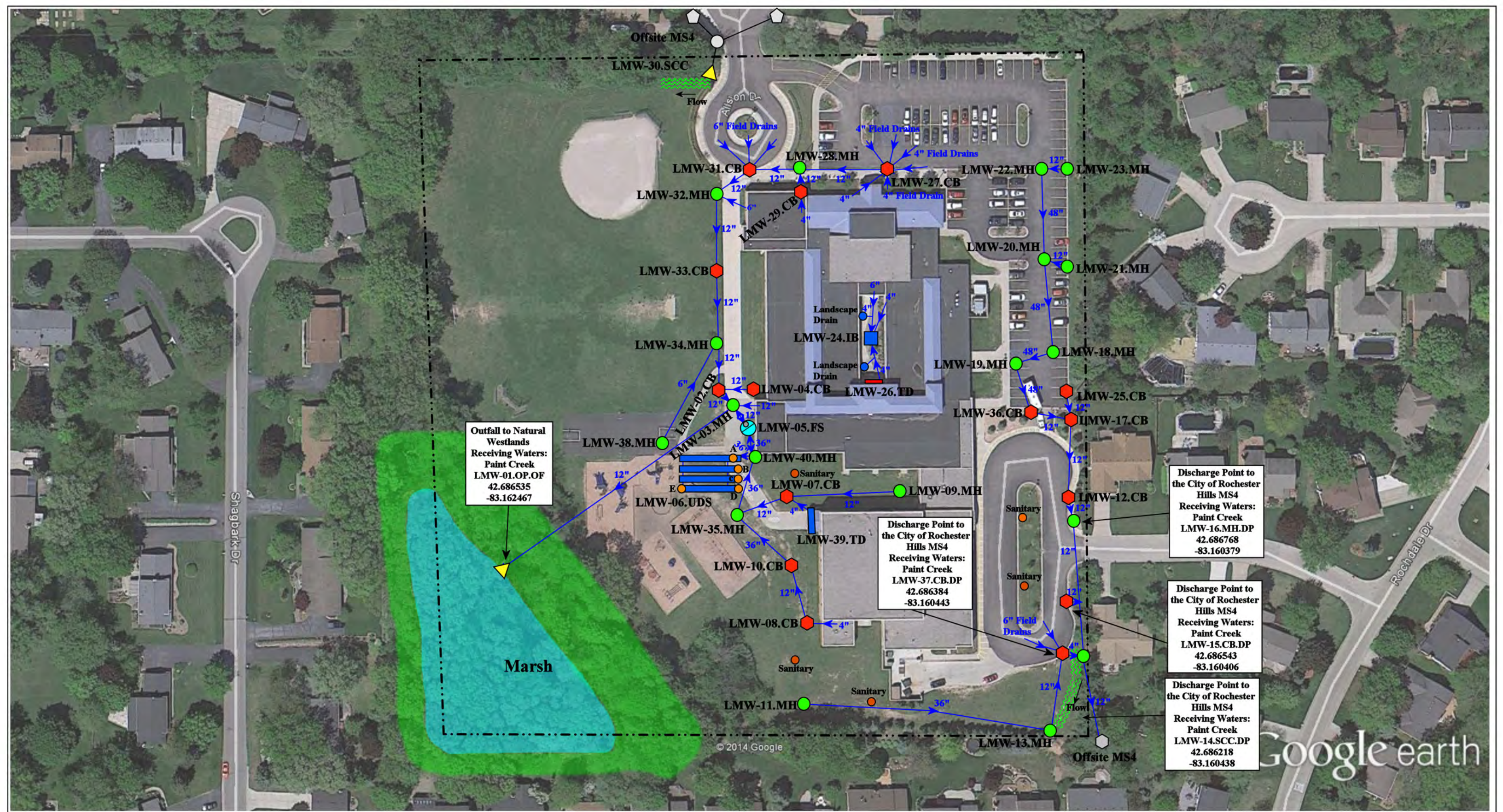




Discharge Point to  
City of Rochester MS4  
Receiving Waters:  
Cranberry Marsh Drain  
ACE-14.SCC.DP  
42.659491  
-83.115235

<p>  = Stormwater Conveyance Channel          = Riverine Wetland       </p>		<p>North</p>	<p>1440 John R Road, Rochester, MI 48307</p>	
<p>  = MS4 Stormwater Conveyance Channel          = Detention Pond       </p>			<p>John M. Schultz Educational Center (Formerly Alternative Center for Education High School)</p>	<p>Revision Date: 01/11/2021</p>
<p>  = MS4 Open Pipe Outlet          = Sanitary       </p>			<p>Rochester Community Schools</p>	<p>Drawn by: AS</p>
			<p> </p>	<p>Reviewed: SR</p>
			<p>37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</p>	<p>Page #: 2 of 2</p>
				<p>Scale: Not to Scale</p>





Outfall to Natural Westlands  
Receiving Waters:  
Paint Creek  
LMW-01.OP.OF  
42.686535  
-83.162467

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters:  
Paint Creek  
LMW-37.CB.DP  
42.686384  
-83.160443

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters:  
Paint Creek  
LMW-16.MH.DP  
42.686768  
-83.160379

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters:  
Paint Creek  
LMW-15.CB.DP  
42.686543  
-83.160406

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters:  
Paint Creek  
LMW-14.SCC.DP  
42.686218  
-83.160438

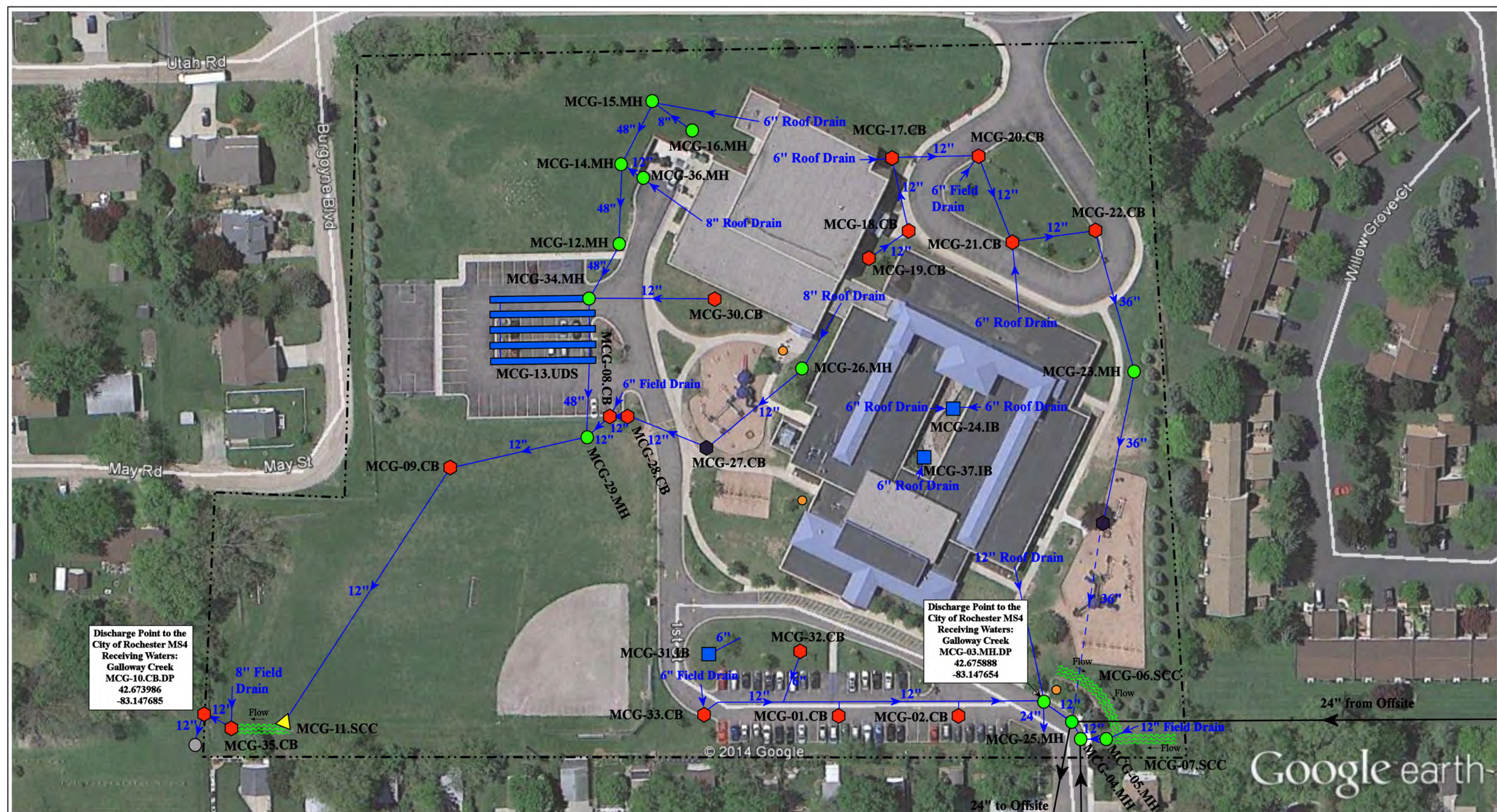
= Catch Basin	= Infiltration Basin	= Buried Structure	= Pond/Basin
= Manhole	= Open Pipe Outlet	= Stabilized Outlet	= Swale/Stormwater
= Basin Drain	= Drainage Receptor	= Flow Splitter	= Conveyance Channel
= Offsite MS4	= Trench Drain	= Hydrodynamic Separator	= Underground Detention System
= Sanitary	= Property Lines		

450 Allston Drive, Rochester Hills MI 48309

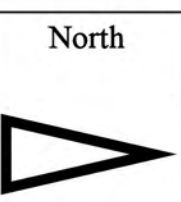
 North	<b>Long Meadow Elementary School</b>		Revision Date:	07/20/2022
	Rochester Community School District		Drawn by:	JOF
 mch environmental group			Reviewed:	CMC
			Page #:	1 of 1
			Scale:	Not to Scale

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



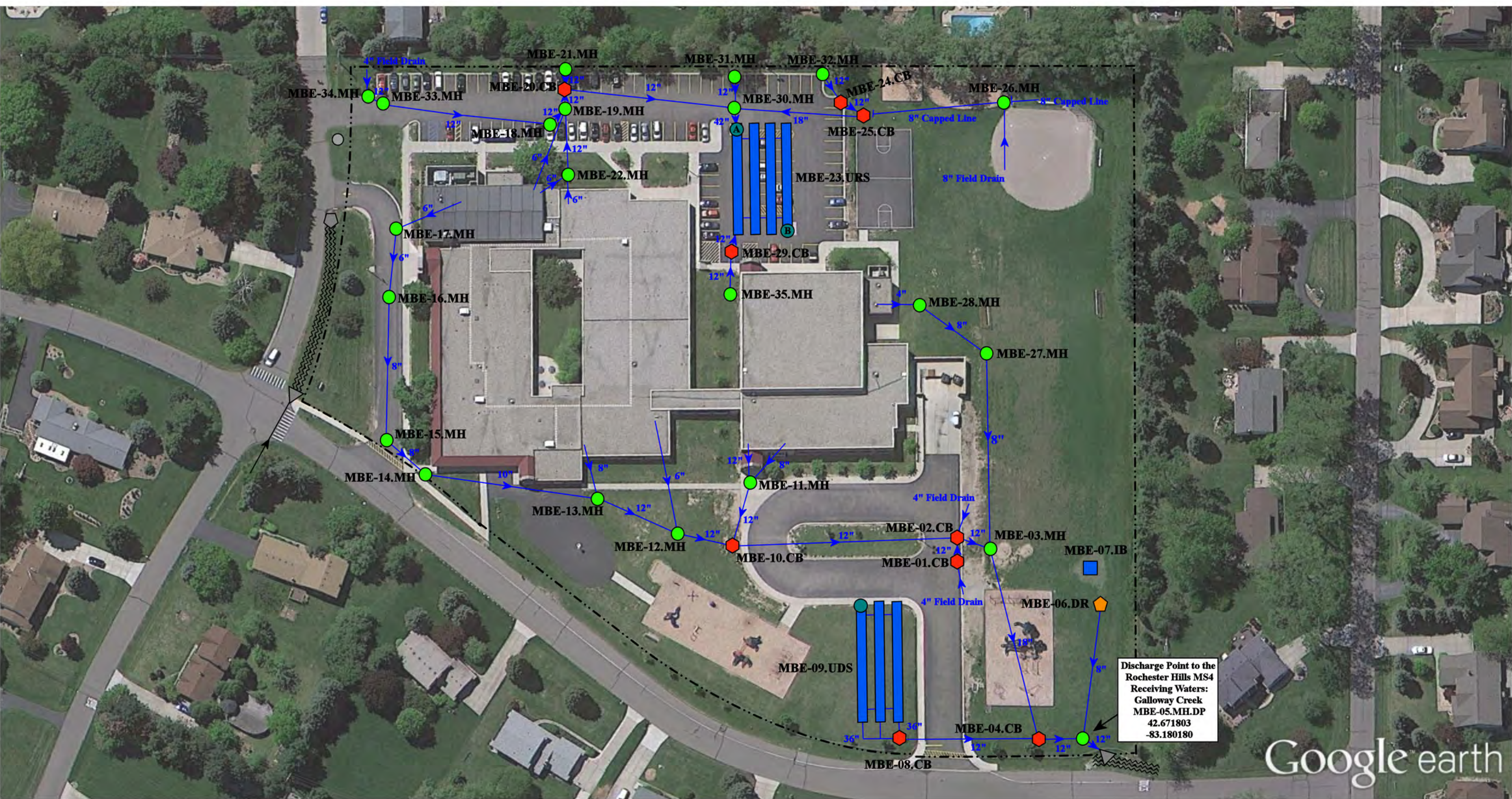


- ⬡ = Catch Basin
- = Manhole
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▨ = Underground Detention System
- ⬢ = Buried Basin
- = City of Rochester MS4
- 〰 = Stormwater Conveyance Channel
- = Sanitary



1101 First St., Rochester, MI 48307			
<b>McGregor Elementary School</b>		Revision Date :	02/08/2022
Rochester Community Schools		Drawn by:	CJ
		Reviewed:	KM
37720 Interchange Drive, Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305		Page #:	1 of 1
		Scale:	Not to Scale





Discharge Point to the  
Rochester Hills MS4  
Receiving Waters:  
Galloway Creek  
MBE-05.MH.DP  
42.671803  
-83.180180

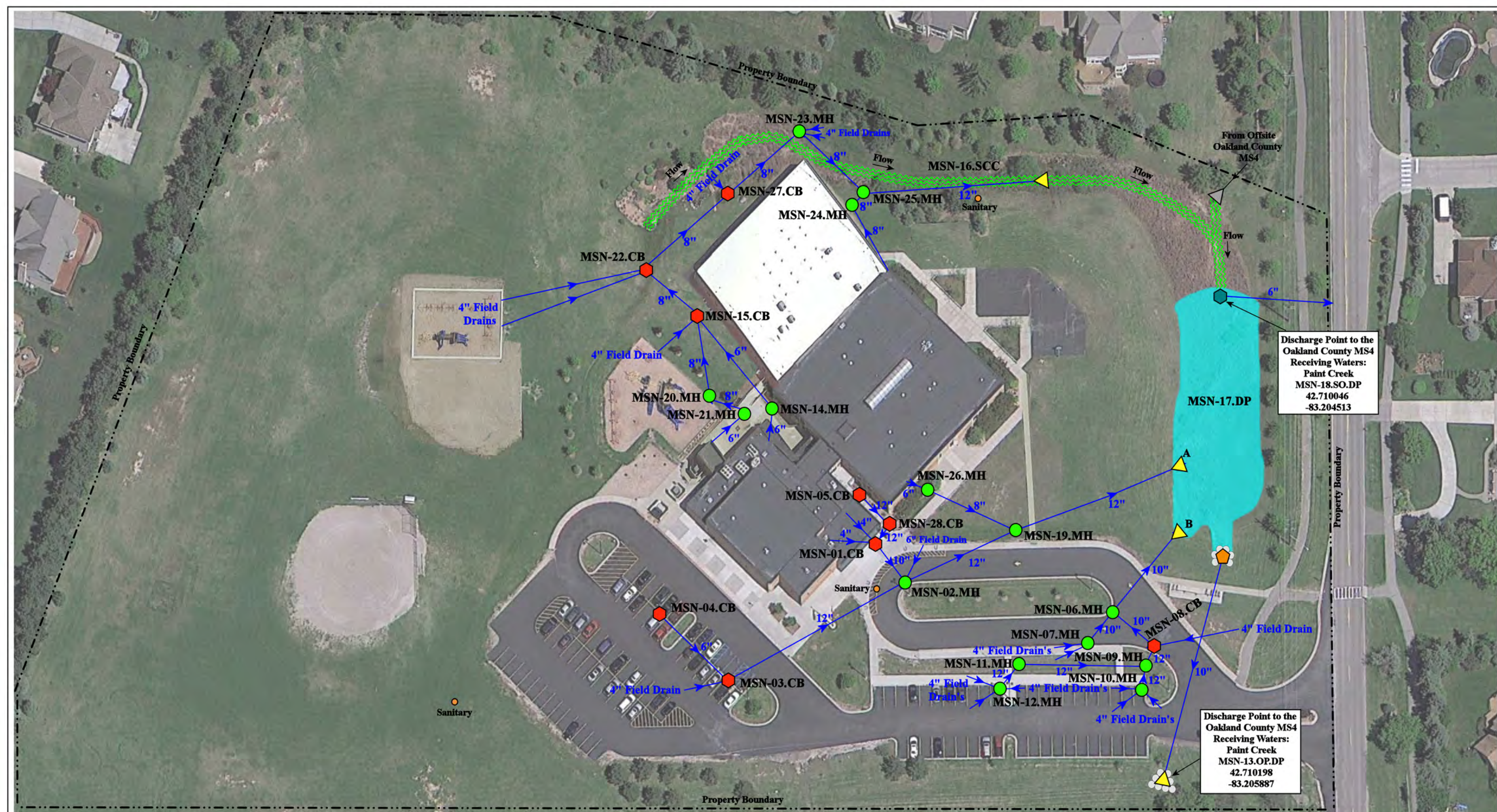
Google earth

- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- = Property Lines
- = Buried Structure
- = Stabilized Outlet
- = Flow Splitter
- = Hydrodynamic Separator
- = Pond/Basin
- = Swale/Stormwater Conveyance Channel
- = Trench Drain
- = Underground Detention / Retention System



2350 Munster Road, Rochester Hills, MI 48309	
<b>Meadow Brook Elementary School</b>	Revision Date: 07/13/2022
Rochester Community Schools	Drawn by: CMC
	Reviewed: BJZ
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	Page #: 1 of 1
	Scale: Not to Scale





Discharge Point to the  
Oakland County MS4  
Receiving Waters:  
Paint Creek  
MSN-18.SO.DP  
42.710046  
-83.204513

Discharge Point to the  
Oakland County MS4  
Receiving Waters:  
Paint Creek  
MSN-13.OP.DP  
42.710198  
-83.205887

= Catch Basin	= Infiltration Basin	= Pond/Basin	= Pond/Basin
= Manhole	= Open Pipe Outlet	= Swale/Stormwater	= Swale/Stormwater
= Basin Drain	= Drainage Receptor	= Conveyance Channel	= Conveyance Channel
= Offsite MS4	= Trench Drain	= Underground Detention System	= Underground Detention System
= Sanitary	= Property Lines		

3500 Dutton Road, Rochester Hills, MI 48306

**Musson Elementary School**

Rochester Community Schools

North

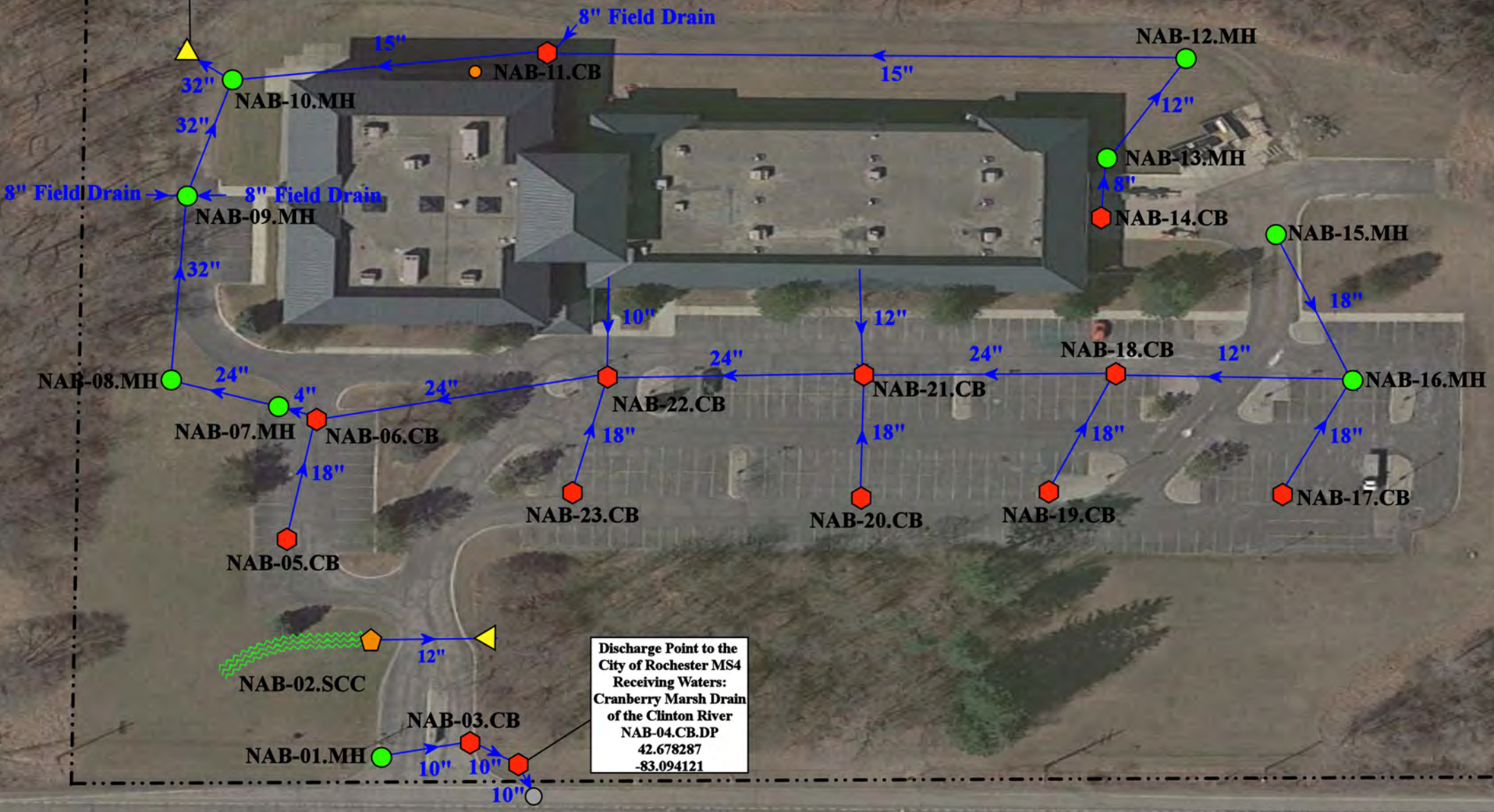
environmental group

Revision Date :	06/29/2022
Drawn by:	EG
Reviewed:	LK
Page #:	1 of 1
Scale:	Not to Scale

33720 Interchange Drive  
 Farmington Hills, MI 48335  
 Phone: 248-426-0165  
 Fax: 248-427-0305



Outfall to the Surface Waters of the State  
 Receiving Waters:  
 Cranberry Marsh Drain  
 of the Clinton River  
 NAB-24.OP.OF  
 42.677756  
 -83.096225

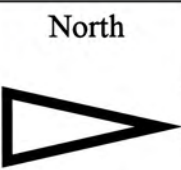


Discharge Point to the City of Rochester MS4  
 Receiving Waters:  
 Cranberry Marsh Drain  
 of the Clinton River  
 NAB-04.CB.DP  
 42.678287  
 -83.094121

Google Earth

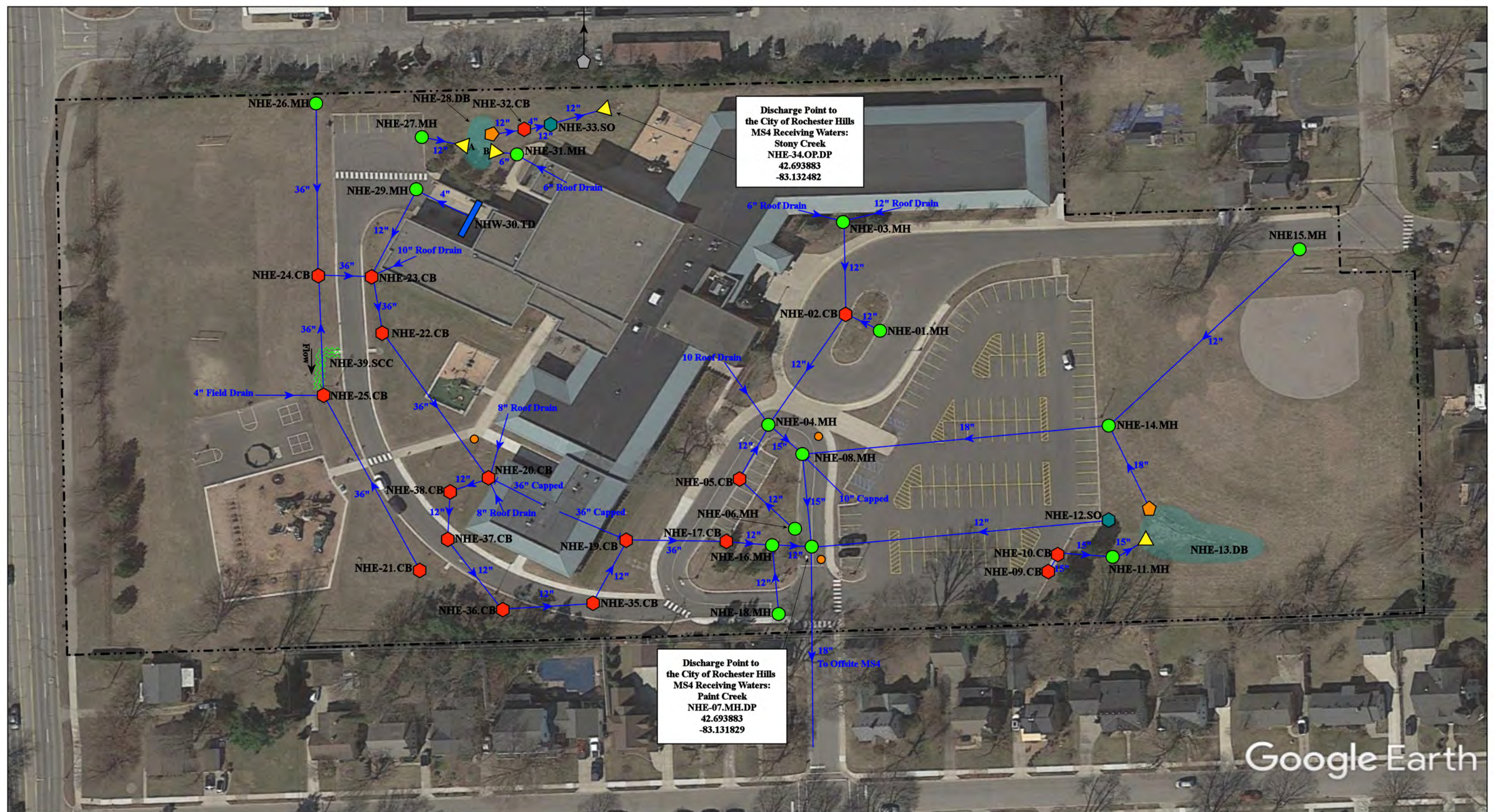
52585 Dequindre Rd, Rochester, MI 48307

- ◆ = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ◆ = Drainage Receptor
- = Trench Drain
- - - = Property Lines
- ◆ = Buried Structure
- ◆ = Stabilized Outlet
- ◆ = Flow Splitter
- ⊗ = Hydrodynamic Separator
- = Pond/Basin
- ~ = Swale/Stormwater Conveyance Channel
- ≡ = Underground Detention System



<b>New Administration Building</b>		Revision Date:	11/1/2022
Rochester Community Schools		Drawn by:	MRW
		Reviewed:	EG
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305		Page #:	1 of 1
		Scale:	Not to Scale





Discharge Point to  
the City of Rochester Hills  
MS4 Receiving Waters:  
Stony Creek  
NHE-34.OP.DP  
42.693883  
-83.132482

Discharge Point to  
the City of Rochester Hills  
MS4 Receiving Waters:  
Paint Creek  
NHE-07.MH.DP  
42.693883  
-83.131829

- ◆ = Catch Basin
- = Manhole
- ▲ = Open Pipe Outlet
- ◆ = Drainage Receptor

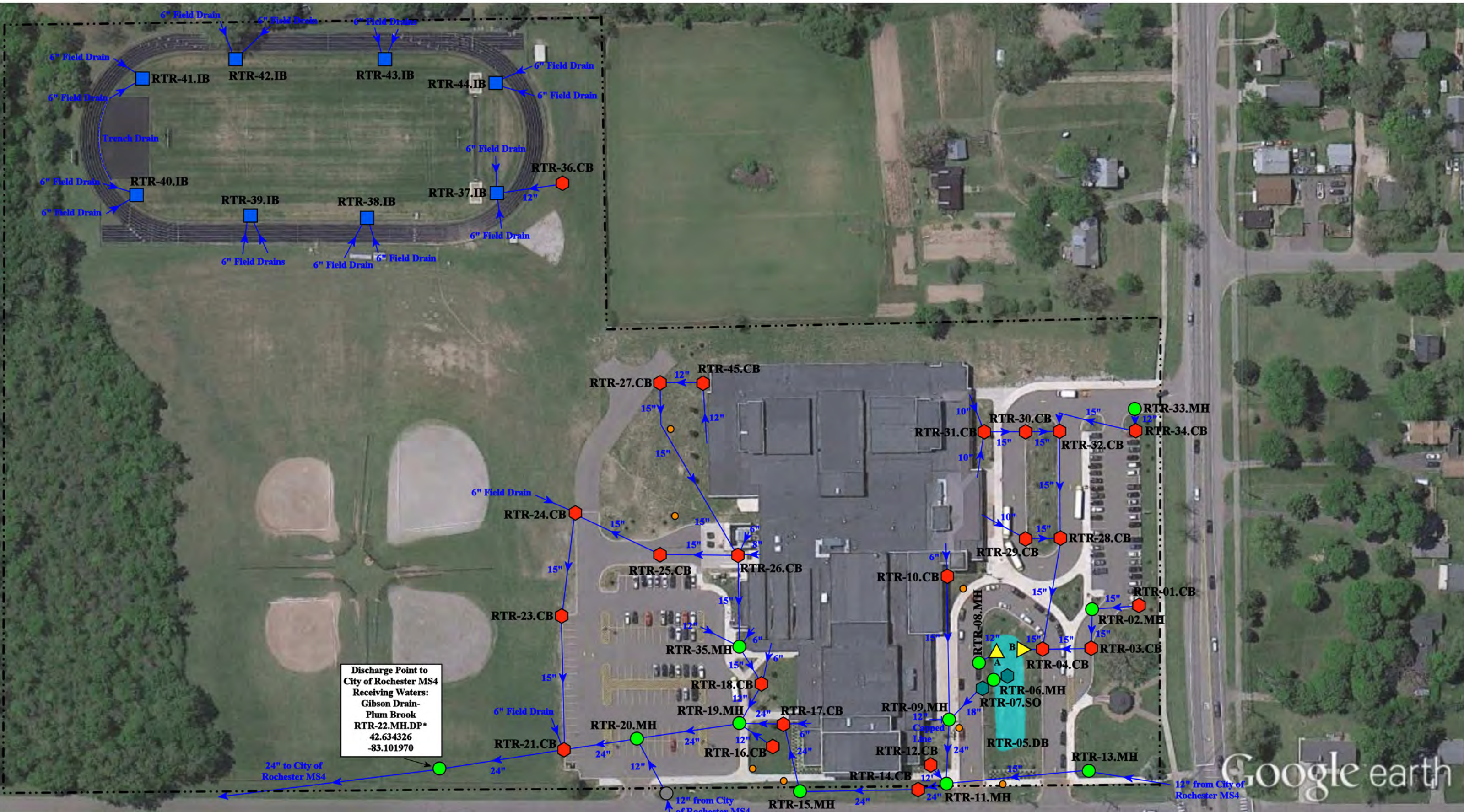
- ◊ = Stabilized Outlet
- ◊ = Detention Basin
- ▨ = Stormwater Conveyance Channel
- ◊ = Offsite MS4 Drainage Receptor

- = Sanitary
- = Trench Drain
- = Property Lines



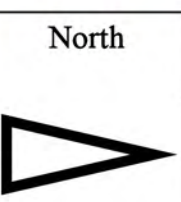
1385 Mahaffy Avenue, Rochester, MI 48307	
<b>North Hill Elementary School</b>	Revision Date: 7/12/2021
Rochester Community Schools	Drawn by: SF
	Reviewed: BJK
	Page #: 1 of 1
	Scale: Not to Scale
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	





Discharge Point to  
City of Rochester MS4  
Receiving Waters:  
Gibson Drain-  
Plum Brook  
RTR-22.MH.DP\*  
42.634326  
-83.101970

- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- = Drainage Receptor
- = Trench Drain
- - - = Property Lines
- = Buried Structure
- = Stabilized Outlet
- = Flow Splitter
- = Hydrodynamic Separator
- = Pond/Basin
- ~ = Swale/Stormwater Conveyance Channel
- = Underground Detention System



## Reuther Middle School

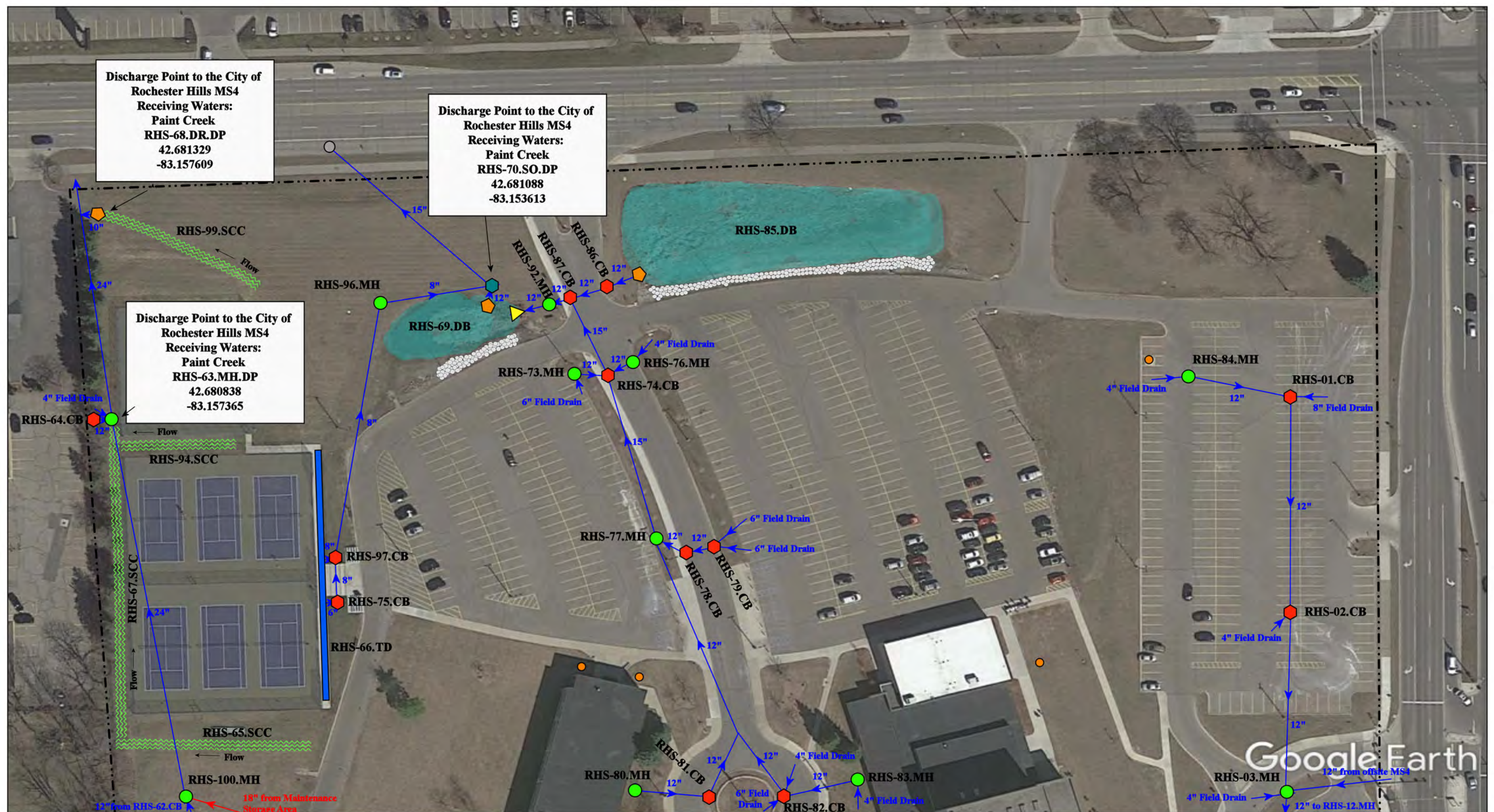
Rochester Community Schools



1430 East Auburn Rd  
Rochester Hills, Michigan 48307

Date:	06/17/2022
Drawn by:	WM
Reviewed:	CJ
Page #:	1 of 1
Scale:	Not to Scale






Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Paint Creek  
 RHS-68.DR.DP  
 42.681329  
 -83.157609

Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Paint Creek  
 RHS-70.SO.DP  
 42.681088  
 -83.153613

Discharge Point to the City of Rochester Hills MS4  
 Receiving Waters:  
 Paint Creek  
 RHS-63.MH.DP  
 42.680838  
 -83.157365

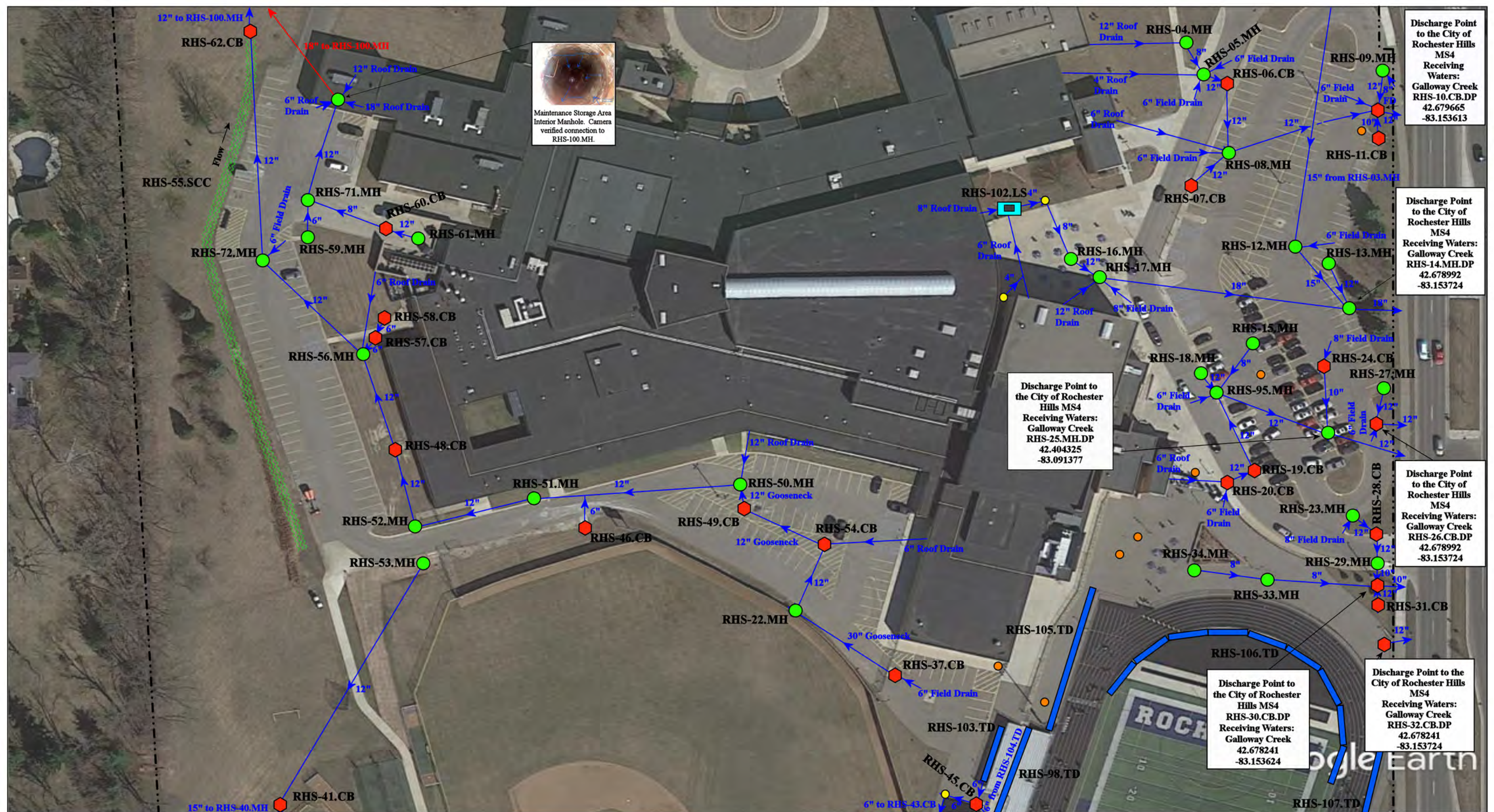
1361 Walton Blvd. / 380 S. Livernois Rd., Rochester Hills, MI 48309

Rochester High School and Transportation Complex	Revision Date:	08/23/2022
	Drawn by:	CCD
Rochester Community Schools	Reviewed:	BJK
	Page #:	1 of 3
	Scale:	Not to Scale
	37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305	

- ◆ = Catch Basin
- = Manhole
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- = Basin Drain
- ◆ = Drainage Receptor
- = Offsite MS4
- = Sanitary
- = Property Lines
- ◆ = Buried Structure
- ◆ = Stabilized Outlet
- = Flow Splitter
- = Hydrodynamic Separator
- = Pond/Basin
- ~ = Swale/Stormwater
- = Conveyance Channel
- ▬ = Underground Detention System







Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-10.CB.DP  
42.679665  
-83.153613

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-14.MH.DP  
42.678992  
-83.153724

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-25.MH.DP  
42.404325  
-83.091377

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-26.CB.DP  
42.678992  
-83.153724

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-30.CB.DP  
42.678241  
-83.153624

Discharge Point to the City of Rochester Hills MS4  
Receiving Waters: Galloway Creek  
RHS-32.CB.DP  
42.678241  
-83.153724

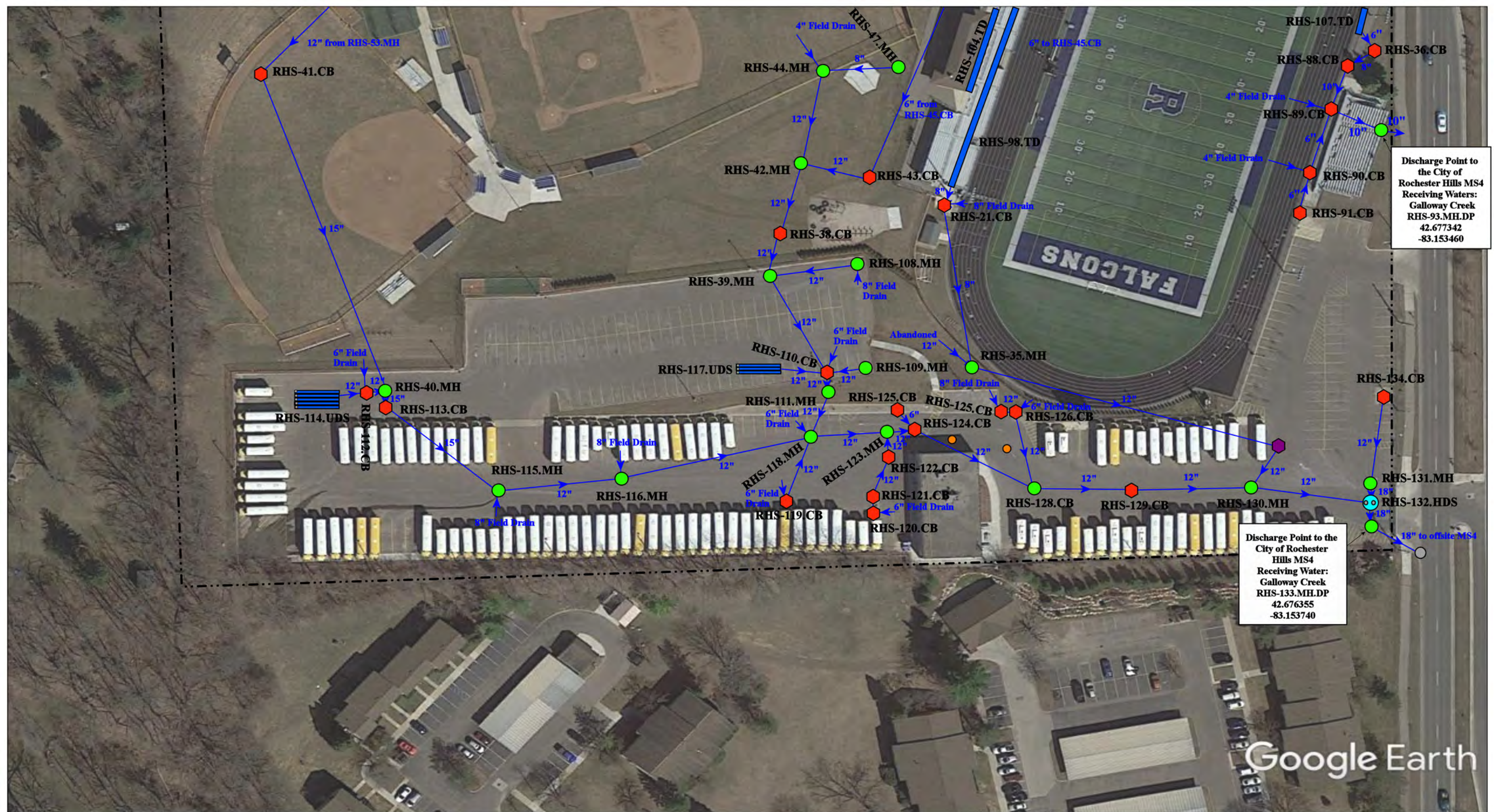
1361 Walton Blvd. / 380 S. Livernois Rd., Rochester Hills, MI 48309

= Catch Basin	= Infiltration Basin	= Buried Structure	= Pond/Basin
= Manhole	= Open Pipe Outlet	= Stabilized Outlet	= Swale/Stormwater
= Basin Drain	= Drainage Receptor	= Flow Splitter	<b>Conveyance Channel</b>
= Offsite MS4	= Trench Drain	= Hydrodynamic Separator	= Underground Detention System
= Sanitary	= Property Lines		



Rochester High School and Transportation Complex		Revision Date:	08/23/2022
Rochester Community Schools		Drawn by:	CCD
		Reviewed:	BJK
		Page #:	2 of 3
37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305		Scale:	Not to Scale





Discharge Point to the City of Rochester Hills MS4 Receiving Waters: Galloway Creek  
RHS-93.MH.DP  
42.677342  
-83.153460

Discharge Point to the City of Rochester Hills MS4 Receiving Water: Galloway Creek  
RHS-133.MH.DP  
42.676355  
-83.153740

Google Earth

<ul style="list-style-type: none"> <li><span style="color: red;">⬡</span> = Catch Basin</li> <li><span style="color: green;">●</span> = Manhole</li> <li><span style="color: blue;">●</span> = Basin Drain</li> <li><span style="color: grey;">●</span> = Offsite MS4</li> <li><span style="color: orange;">●</span> = Sanitary</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: blue;">■</span> = Infiltration Basin</li> <li><span style="color: yellow;">▲</span> = Open Pipe Outlet</li> <li><span style="color: orange;">▲</span> = Drainage Receptor</li> <li><span style="color: blue;">—</span> = Trench Drain</li> <li><span style="color: grey;">---</span> = Property Lines</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: purple;">◆</span> = Buried Structure</li> <li><span style="color: teal;">◆</span> = Stabilized Outlet</li> <li><span style="color: magenta;">◆</span> = Flow Splitter</li> <li><span style="color: cyan;">◆</span> = Hydrodynamic Separator</li> </ul>	<ul style="list-style-type: none"> <li><span style="color: lightblue;">■</span> = Pond/Basin</li> <li><span style="color: green;">~</span> = Swale/Stormwater</li> <li><span style="color: blue;">—</span> = Conveyance Channel</li> <li><span style="color: blue;">—</span> = Underground Detention System</li> </ul>	<p>North</p>	<p>1361 Walton Blvd., / 380 S. Livernois Rd., Rochester Hills, MI 48309</p>	
<p>Rochester High School and Transportation Complex</p> <p>Rochester Community Schools</p>					<p>Revision Date : 08/23/2022</p>	
					<p>Drawn by: CCD</p>	
<p>37720 Interchange Drive Farmington Hills, MI 48335 Phone: 248-426-0165 Fax: 248-427-0305</p>					<p>Reviewed: BJK</p>	
<p>environmental group</p>					<p>Page #: 1 of 1</p>	
<p>Scale: Not to Scale</p>						





**Outfall to the Unnamed Tributary of the Stoney Creek**  
**SCR-80.OP.OF**  
 42.702517  
 -83.123769

- ◆ = Catch Basin
- = Manhole
- ◆ = Stabilized Outlet
- ▲ = Open Pipe Outlet
- = Detention Basin
- = Buffer Filter Strip
- ◄ = Offsite MS4
- ~ ~ ~ = Stormwater Conveyance Channel
- ◆ = Drainage Receptor

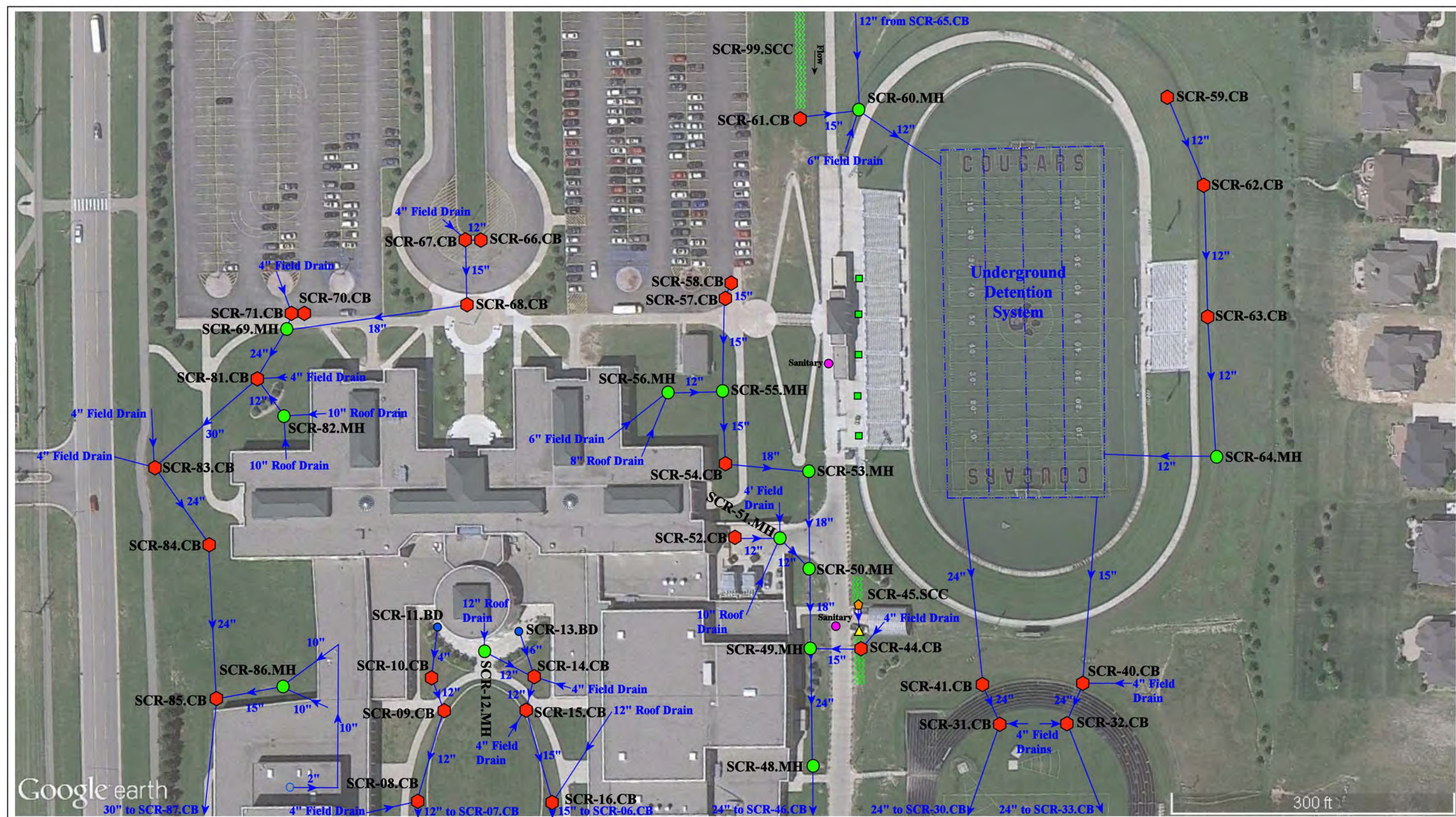


<b>Stoney Creek High School</b>		Date:	09/24/2020
Rochester Community Schools		Drawn by:	JOF
		Reviewed:	JGS
6755 Sheldon Rd Rochester Hills, MI 48306		Page #:	1 of 3
		Scale:	Not to Scale

400 ft

Google earth





Google earth

300 ft

- = Catch Basin
- = Manhole
- = Basin Drain
- ◆ = Drainage Receptor
- ▲ = Open Pipe Outlet
- = Landscape Drain
- = Underground Detention System
- ~ = Stormwater Conveyance Channel
- = Groundwater Sump



## Stoney Creek High School

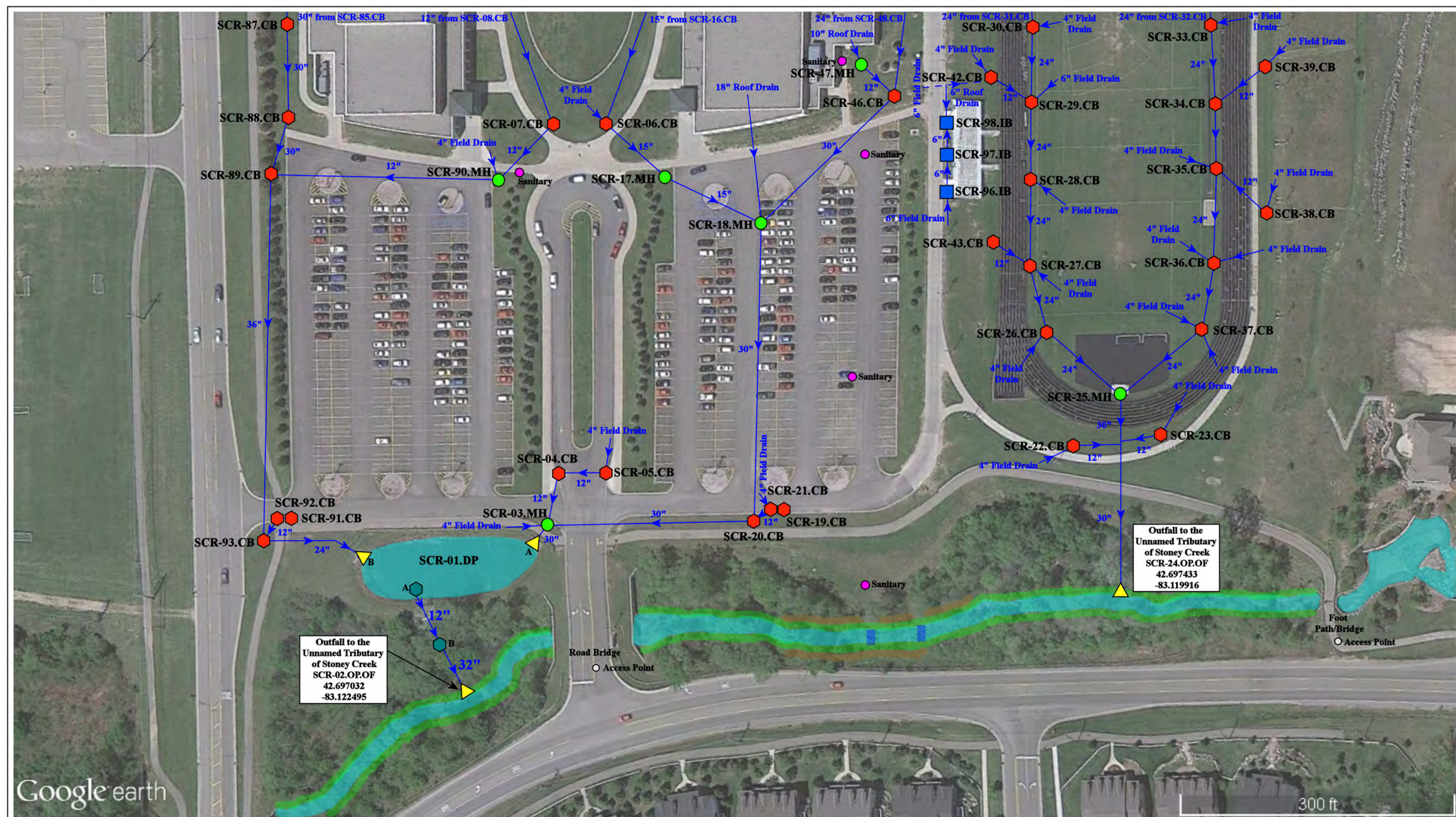
Rochester Community Schools



6755 Sheldon Rd  
Rochester Hills, MI 48306

Date:	11/8/2022
Drawn by:	JOF
Reviewed:	JGS
Page #:	2 of 3
Scale:	Not to Scale





Google earth

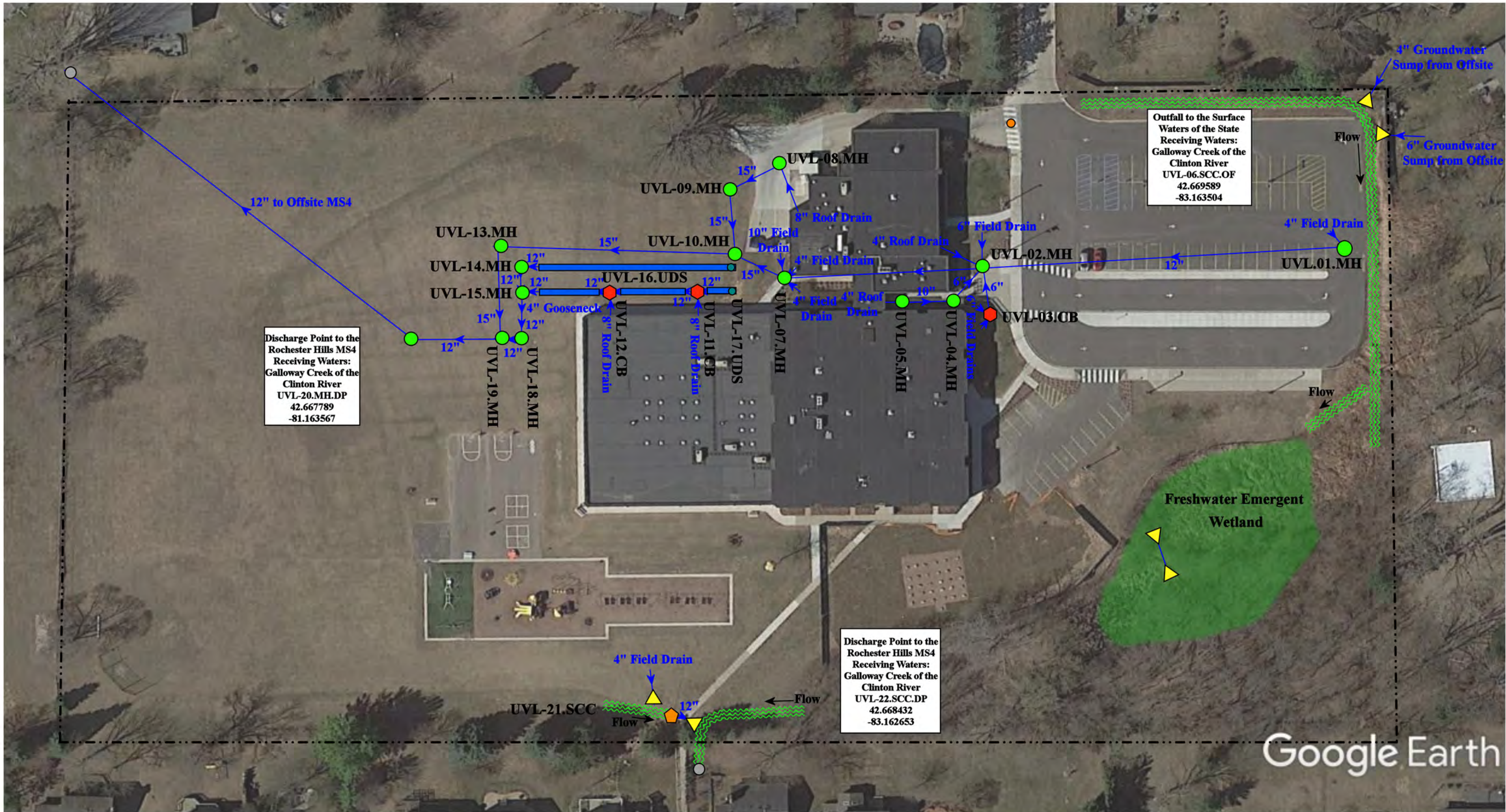
300 ft

- ◆ = Catch Basin
- = Manhole
- ◆ = Drainage Receptor
- ▲ = Open Pipe Outlet
- = Buffer Filter Strip
- = Erosion Area
- = Infiltration Basin
- = Stabilized Outlet
- = Detention Pond
- = Waterfall



<b>Stoney Creek High School</b>		Date:	09/28/2020
Rochester Community Schools		Drawn by:	JOF
		Reviewed:	CMC
6755 Sheldon Rd Rochester Hills, MI 48306		Page #:	3 of 3
		Scale:	Not to Scale





Discharge Point to the Rochester Hills MS4 Receiving Waters: Galloway Creek of the Clinton River  
 UVL-20.MH.DP  
 42.667789  
 -81.163567

Outfall to the Surface Waters of the State Receiving Waters: Galloway Creek of the Clinton River  
 UVL-06.SCC.OF  
 42.669589  
 -83.163504

Discharge Point to the Rochester Hills MS4 Receiving Waters: Galloway Creek of the Clinton River  
 UVL-22.SCC.DP  
 42.668432  
 -83.162653

Google Earth

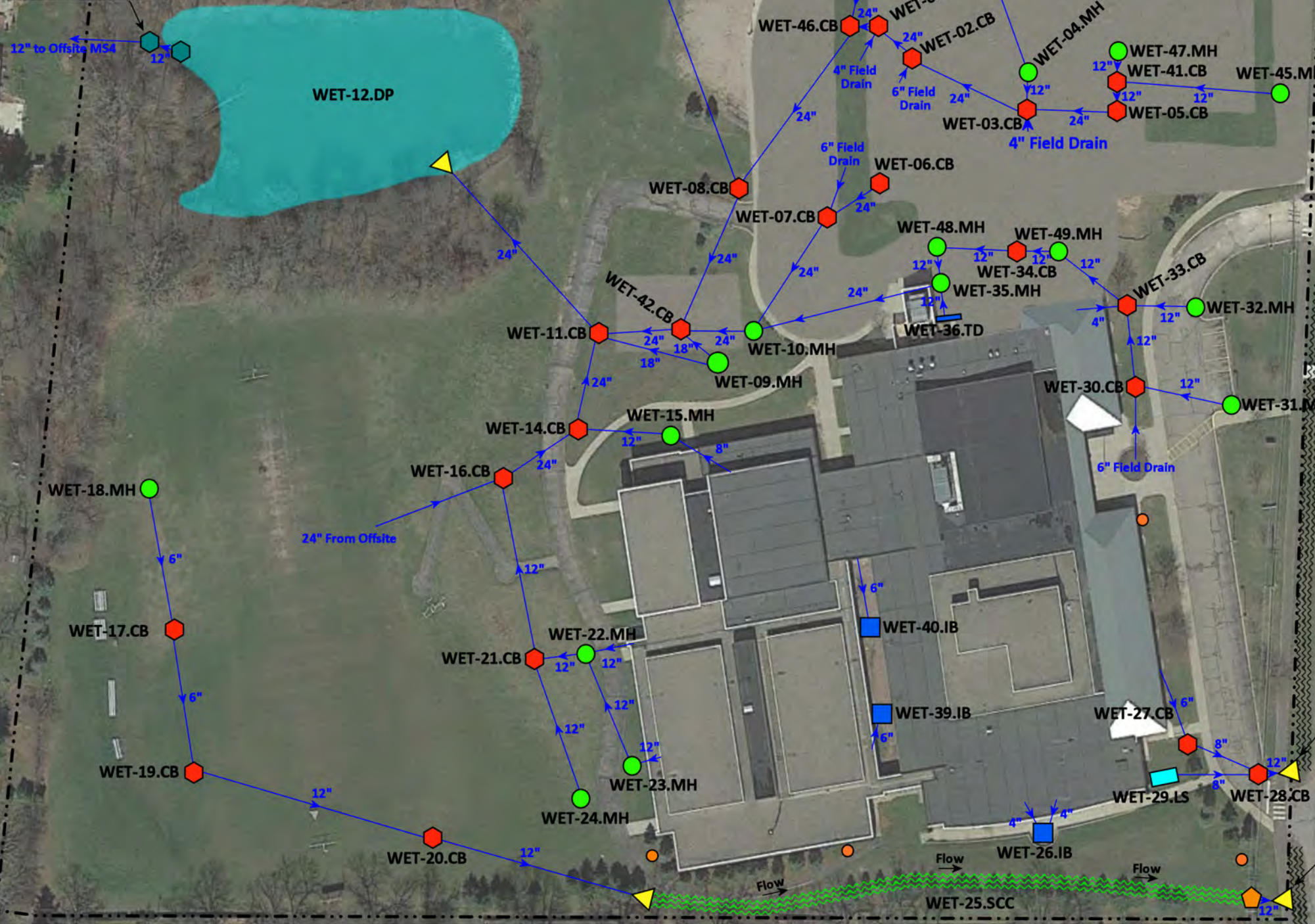
- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- ▬ = Trench Drain
- = Buried Structure
- = Stabilized Outlet
- = Flow Splitter
- ⊗ = Hydrodynamic Separator
- = Pond/Basin
- ▬ = Swale/Stormwater Conveyance Channel
- ▬ = Underground Detention System
- ▬ = Property Lines



600 Croydon Rd, Rochester Hills, MI 48309		Revision Date :	04/11/2022
<b>University Hills Elementary School</b>		Drawn by:	EDG
Rochester Hills Community Schools		Reviewed:	CJ
		Page #:	1 of 1
<small>37720 Interchange Drive        Farmington Hills, MI 48335        Phone: 248-426-0165        Fax: 248-427-0305</small>		Scale:	Not to Scale



Discharge Point  
to the City of  
Rochester Hills MS4  
Receiving Waters:  
Galloway Creek  
of the Clinton River  
WET.13.SO.DP  
42.674891  
-83.176206



Discharge Point  
to the City of  
Rochester Hills MS4  
Receiving Waters:  
Galloway Creek  
of the Clinton River  
WET.38.OP.DP  
42.673504  
-83.172523

Discharge Point  
to the City of  
Rochester Hills MS4  
Receiving Waters:  
Galloway Creek  
of the Clinton River  
WET.37.OP.DP  
42.673206  
-83.172496

Google Earth

- = Catch Basin
- = Manhole
- = Basin Drain
- = Offsite MS4
- = Sanitary
- = Infiltration Basin
- ▲ = Open Pipe Outlet
- ▲ = Drainage Receptor
- = Trench Drain
- = Property Lines
- ◆ = Buried Structure
- ◆ = Stabilized Outlet
- ◆ = Flow Splitter
- ◆ = Hydrodynamic Separator
- = Pond/Basin
- ~ = Swale/Stormwater Conveyance Channel
- = Underground Detention System



500 Old Perch Rd, Rochester Hills, MI 48309

**West Middle School**  
Rochester Community Schools



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

Revision Date :	01/26/2023
Drawn by:	WM
Reviewed:	CJ
Page #:	1 of 1
Scale:	Not to Scale



# Appendix B

## Enforcement Policies and Tracking Forms







**Rochester Community Schools  
Board of Education  
Resolution in Support of Stormwater Management Plan**

**WHEREAS** Rochester Community Schools owns and operates facilities within the boundaries of the “Detroit” urbanized area which discharges stormwater through a municipal separate storm sewer system (MS4) to surface waters of the State of Michigan; and

**WHEREAS** The Michigan Department of Environment, Great Lakes, and Energy maintains oversight and regulatory authority for compliance with the terms and conditions of the NPDES Municipal Separate Storm Sewer System discharge permit; and

**WHEREAS** Rochester Community Schools has applied for and received permit coverage to discharge stormwater from Rochester Community Schools facilities to the MS4; and

**WHEREAS** Rochester Community Schools agrees to comply with the NPDES Municipal Separate Storm Sewer System discharge permit requirements, and

**WHEREAS** Rochester Community Schools has developed a Stormwater Management Program Plan (SWMP) outlining the policies, procedures, and best management practices to be employed by the district to comply with the permit requirements, and

**WHEREAS** the conditions of the NPDES Municipal Separate Storm Sewer System discharge permit require Rochester Community Schools to develop policies and procedures that prohibit illicit discharges to their stormwater system and to implement appropriate enforcement procedures and actions to detect and eliminate such illicit discharges, and

**WHEREAS** Rochester Community Schools agrees to prohibit the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants, and

**WHEREAS** Rochester Community Schools agrees to eliminate illicit discharges and illicit connections, and

**WHEREAS** Rochester Community Schools agrees to prohibit the construction, use, maintenance or continued existence of illicit connections to the storm drain system. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection, and

**WHEREAS** Rochester Community Schools agrees to obtain a Part 91 permit from the appropriate state, county, or local governmental soil erosion permitting agency for new development and redevelopment projects that disturb one or more acres, and

**WHEREAS** Rochester Community Schools agrees to obtain a construction site permit from the local municipality or other governing unit for new development and redevelopment projects that disturb one or more acres, and

**WHEREAS** Rochester Community Schools agrees to inspect, operate, and maintain structural controls for the purpose of reducing pollutant contribution, control runoff, and decrease or eliminate stream bank erosion due to stormwater runoff, and

**WHEREAS** Rochester Community Schools agrees to comply with the requirements of the State of Michigan Permit (Rule 323.2190) for stormwater discharge from construction activity.

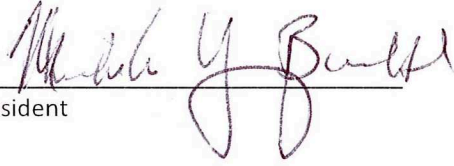
**THEREFORE**, be it resolved that the Rochester Community Schools Board of Education is highly committed to practicing sound environmental principals including the reduction of pollutants to surface waters through discharges of stormwater. The Board hereby approves and instructs the district Superintendent to enforce the above listed policies and procedures for illicit discharge elimination, control of stormwater runoff and long-term operation and



maintenance of structural controls as part of the overall Rochester Community Schools Stormwater Management Program Plan.

Duly passed and approved by the Rochester Community Schools Board of Education, Oakland County, Michigan this 13 day of February

Approved:

  
\_\_\_\_\_  
President

Attest:

  
\_\_\_\_\_  
Secretary



District Illicit Discharge/Illegal Dumping Reporting Form  
Rochester Community Schools

Date: \_\_\_\_\_ Time \_\_\_\_\_

Inspectors: \_\_\_\_\_

**I. ORIGIN OF REPORT**

**1. Describe the reason for conducting the investigation.**

- Illicit Discharge Inspection (Routine)       Facility Staff  
 Citizen Complaint  
 Other \_\_\_\_\_

**II. SOURCE**

**1. Describe location of source of discharge (company name, address, cross streets, physical features, etc.)**

\_\_\_\_\_  
\_\_\_\_\_

**2. Describe the Source:**

- Residential                                       Transportation Facility  
 Construction Site                               Custodial  
 Other \_\_\_\_\_

**3. Facility of the Source:** \_\_\_\_\_

\_\_\_\_\_

**III. TYPE**

**1. Describe the type of material discharged:**

- Sanitary Leak/Spill                               Paint Discharge  
 Dumpster Discharge                               Cleaning Discharge  
 Unhardened Cement Discharge               Paint Discharge  
 Vehicle Repair                                       Vehicle Washing  
 Grey Water Discharge                               Landscape Material Dumping  
 Cooling Water Discharge                               Allowable Discharge  
 Other \_\_\_\_\_

Provide Additional Information: \_\_\_\_\_

\_\_\_\_\_

**2. Other Sources:**

- Illicit Connection  
 Construction Site  
 Other \_\_\_\_\_

**IV. FOLLOW-UP AND ENFORCEMENT ACTIVITIES**

**1. Describe Corrective Actions:** \_\_\_\_\_

\_\_\_\_\_

**2. Describe Enforcement Action:**

- None/Incident Resolved       Verbal Notice  
 Administrative Action       Cleaning Discharge

**3. Date Resolved:** \_\_\_\_\_

**4. Responsible Party**

**Signature:** \_\_\_\_\_



# Stormwater Management – Illicit Discharge Regulatory Policy

Rochester Community Schools  
Permit Number: MI0060149  
Issue date: December 20, 2021

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

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

District properties include all Rochester Community Schools properties.

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

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

## Prohibitions of Illicit Discharges

---

1. Prohibition of Illicit Discharges:
  - a. Rochester Community Schools prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.
  - b. No person shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw, drain, or otherwise discharge into the MS4 any pollutants or waters containing any pollutants, other than stormwater.
2. The following discharge is **not prohibited**:
  - a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the Rochester Community Schools MS4. Discharge or flows from firefighting activities will



be addressed only if they are identified as significant sources of pollutants to surface waters of the state.

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

## **Prohibition of Illicit Connections**

---

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

## **Enforcement**

---

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

**If you witness or think a discharge is taking place, please contact the Rochester Community Schools at 248-726-3000.**



# Stormwater Management - Post-Construction Policy & Procedure

Rochester Community Schools

Permit Number: MI0060149

Issue date: December 20, 2021

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

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

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## Post-Construction Requirements Policy Statement

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Rochester Community Schools development and redevelopment projects on District property are regulated under and must comply with the Rochester Community Schools NPDES permit for stormwater discharges, as issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Stormwater Management Post-Construction Requirements Guideline has been developed to provide guidance regarding responsibilities and actions to meet the NPDES permit conditions for development and redevelopment projects on district owned properties.

## Post-Construction Plan for Stormwater Management

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

- A minimum treatment volume standard to address water quality impacts.
- Channel protection criteria to address resource impairment resulting from flow volumes and rates.
- Review sites with known soil and/or groundwater contamination, including potential “hot spots” and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria to ensure that infiltration BMPs do not exacerbate existing conditions. Hot spots include areas with the potential for significant pollutant loading such as vehicle service and maintenance facilities, vehicle equipment cleaning facilities, fleet storage areas for buses, and outdoor liquid container storage.
- Drawings showing the location of stormwater control measures and the storm system.
- Details on the proposed stormwater control measures.
- Operation & Maintenance (O&M) requirements.
- Supporting information
  - Calculations used for designing all components of the stormwater management systems.
  - Total Suspended Solids (TSS) design removal rates and supporting manufacturer documentation, if applicable.



- Geotechnical report including soil boring and infiltration test data.

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

### ***Water Quality Treatment Volume Standard***

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

- Treat the first one (1) inch of runoff from the entire site.
- OR**
- Treat the runoff generated from ninety percent (90%) of all runoff-producing storms for the project site, as summarized in MDEQ's memo dated March 24, 2006  
[https://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent\\_557709\\_7.pdf](https://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent_557709_7.pdf)

### ***Total Suspended Solids***

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

- A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff.
- OR**
- Discharge concentrations of TSS not to exceed 80 milligrams per liter (80mg/L).

A minimum treatment volume standard is not required where site conditions are such that TSS concentrations in storm water discharges will not exceed 80mg/L.

### ***Channel Protection Criteria***

The channel protection criteria must maintain post-development site runoff volume and peak flow rate at or below existing levels for all storms up to the 2-year, 24-hour event. "Existing levels" means the runoff volume and peak flow rate for the last land use prior to the planned new development or redevelopment. More restrictive channel protection criteria may be utilized on a case-by-case basis, as appropriate.

### ***Site Plan Review***

This policy is to establish a requirement to submit a site plan for review as required by the EGLE NPDES Stormwater Discharge Permit and ensure that water quality objectives, erosion and sediment control requirements, and BMP maintenance are considered to the maximum extent practicable.

Rochester Community Schools shall evaluate proposed construction activities to determine:

- If the activity meets the criteria of a development or redevelopment project with an earth disturbance greater than or equal to 1 acre, or part of a common plan of development resulting in a development or redevelopment activity greater than or equal to 1 acre in size.
- Does the development or redevelopment project discharge to waters of the state, or to a county, city, or township MS4.

If the development or redevelopment project discharges directly to waters of the state, Rochester Community Schools shall comply with the post-construction standards outlined in this SWMP.



If the development or redevelopment project discharges to a regulated county, city, or township MS4, Rochester Community Schools shall submit the site plan for review and approval. Site plan approval by the county, city, or township of an equivalent post-construction standard ensures acceptable compliance with the Rochester Community Schools NPDES MS4 Stormwater Discharge Permit. Rochester Community Schools shall obtain and maintain a copy of the site plan approval *document*.

If the development or redevelopment project discharges to a county, city, or township MS4 that is not regulated or require site plan review, Rochester Community Schools shall comply with the post-construction standards outlined in this SWMP.

### ***Operations & Maintenance Plans***

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

### **Enforcement**

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



## Appendix C

**Clinton River Watershed Council's Collaborative Public Education Plan (which includes the CRWC's Clinton Main Priority Table and the Rochester Community Schools District Specific Priority Table)**



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

**Collaborative Public Education Plan**

**Approved:  
March 21<sup>st</sup>, 2023**

**Submitted by the Clinton River Watershed Council on behalf of  
Macomb County, Oakland County  
and the MS4 permit holders that participate in the  
Clinton River Watershed Council's Stormwater Education Program**



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## I. INTRODUCTION

This watershed wide Public Education Plan (PEP) was developed to inform the public within the Clinton River Watershed about their role in protecting water quality and preventing stormwater 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.

## II. PARTNERS & STAKEHOLDERS

This watershed wide PEP is submitted on behalf of Macomb County, Oakland County and the MS4 permit holders that participate in the Stormwater Education Program facilitated by the Clinton River Watershed Council (CRWC). Municipal staff, county agencies, and CRWC participated in the development of the PEP. The CRWC Stormwater Education program was developed to assist communities that must comply with the NPDES Phase I or Phase II stormwater discharge regulations. Activities facilitated by CRWC, Macomb and Oakland Counties, and the MSU Extension Office will be reported on behalf of the following permit holders and their nested MS4's.

Avondale School District	City of Grosse Pointe Shores	City of Utica
Charter Township of Chesterfield	City of Fraser	City of Warren
Charter Township of Clinton	City of Harper Woods	Independence Township
Charter Township of Harrison	City of Hazel Park	Macomb Intermediate School District
Charter Township Orion	City of Madison Heights	Macomb Township
Charter Township of Oxford	City of Mount Clemens	Macomb County
Charter Township of Shelby	City of New Baltimore	Oakland County
Charter Township of Washington	City of Orchard Lake Village	Oakland University
City of Center Line	City of Pontiac	Oxford Area Community Schools
City of Keego Harbor	City of Rochester	Rochester Community Schools
City of Eastpointe	City of Rochester Hills	Village of Lake Orion
City of Fraser	City of Roseville	Village of New Haven
City of Grosse Pointe	City of St. Clair Shores	Village of Oxford
City of Grosse Pointe Farms	City of Sterling Heights	Village of Romeo
City of Grosse Pointe Park	City of Sylvan Lake	
	City of the Village of Clarkston	
	City of Troy	

Clinton River watershed communities, subwatershed groups, and partners agreed that approaching stormwater education on a watershed, cross-jurisdictional basis is both cost-effective and environmentally sound. The watershed approach allows the partners to share information and resources to address stormwater concerns at their source. Similarly, developing and implementing a public education program on a watershed basis provides a consistent and effective mechanism for protecting water resources across the region, while leveraging financial resources in each community.

During preparation of this PEP, various municipal staff, environmental organizations, county agencies, and the MSU Extension offices were contacted.

The following information was compiled to identify and organize existing stormwater education materials and programs:

- Existing materials or programs used to educate the public about watersheds and water quality protection (e.g. brochures, videos, displays, school programs, etc.).
- Existing audiences to target for watershed education (e.g. homeowners associations, lake associations, churches, civic groups, business associations, etc.).
- Existing communication methods that could be used to disseminate watershed education (e.g. cable access channel, email, website, newsletter, water bills, etc.).

### **III. CLINTON RIVER WATERSHED COUNCIL'S STORMWATER EDUCATION PROGRAM**

The CRWC is a nonprofit organization dedicated to protecting, enhancing, and celebrating the Clinton River, its watershed, and Lake St. Clair. For over 50 years, the CRWC has worked collaboratively with local governments, businesses, individuals, and other community groups to address water quality and land use issues in the watershed. Stormwater runoff is the leading source of pollution in the Clinton River today, thus CRWC's efforts are focused primarily on decreasing the amount of stormwater and stormwater pollution reaching our streams, rivers, and lakes. CRWC works to achieve its mission by providing education and stewardship programs to the more than 1.5 million people, 63 communities, and 4 counties in the Clinton River watershed.

Upon the request of a number of communities, CRWC developed the Stormwater Education Program to assist its members in meeting their Phase I or Phase II public education requirements. The components of the Stormwater Education Program are outlined in this PEP, along with materials and programs offered by the counties, CRWC, and MSU extension. These materials and programs will be supported and promoted by the MS4 permittees named in this PEP. In subscribing to the Stormwater Education Program, each participating entity has entered into contract with the watershed council. CRWC has agreed to provide the programs outlined in this plan.

As outlined in this PEP, CRWC's program includes the following major components:

- Education of the public and recruitment of volunteers in each subwatershed through a variety of outreach methods (presentations, workshops, websites, cable TV, print media, etc.).
- Regular volunteer training sessions and establishment of water quality monitoring sites throughout each subwatershed.
- Quarterly stormwater management forums for municipal staff, City Council members, planners, engineers, consultants, MDEQ MS4 permit staff, and other watershed stakeholders to share information and discuss topics related to stormwater management, planning, and infrastructure development.
- Coordination of other on-going education and stewardship efforts, including River Day, Weekly Clean, Clinton Clean-Up, paddling events, water festivals, Adopt-A-Stream citizen science program, the Stream Leaders student river monitoring program, and the RiverSafe LakeSafe program.



- Engage and collaborate with municipalities to promote and facilitate CRWC's WaterTowns™ place making initiative focused on connecting communities to their waterways through education, green stormwater infrastructure, history, art, and ecology.
- Development and distribution of supporting print and web-based materials.

#### **IV. GOALS & OBJECTIVES**

The goal of this PEP is to promote, publicize, and facilitate watershed education for the purpose of encouraging the public to reduce the discharge of pollutants in stormwater to the maximum extent practicable. Pollution prevention shall be encouraged.

“Public” is defined to include all persons who potentially could affect the authorized stormwater discharges, including, but not limited to, residents, visitors to the area, public employees, businesses, industries, construction contractors, and developers.

This PEP is designed to ensure that the targeted audiences (“public”) are reached with the appropriate messages for the following nine topics as required in the 2003 NPDES Phase II stormwater permit:

1. Responsibility and stewardship in their watershed.
2. The connection of MS4 catch basins, storm drains, and ditches to area waterways, and the potential impacts these could have on the surface waters of the state.
3. Public reporting of illicit discharges or improper disposal of materials in MS4s.
4. The effects and need to minimize the amount of residential or noncommercial wastes discharged into MS4s, including:
  - i. Preferred cleaning materials and procedures for car, pavement, and power washing.
  - ii. Acceptable application and disposal of pesticides, herbicides, and fertilizers.
  - iii. Proper disposal practices for grass clippings, leaf litter, and animal wastes that get flushed into MS4s and the surface waters of the state.
5. The availability, location, and requirements of facilities for disposal or drop-off of household hazardous wastes, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.
6. For property owners with septic systems, the proper septic system care and maintenance, and how to recognize system failure.
7. The benefits of using native vegetation as well as other landscape practices that enhance water quality such as rain gardens and rain barrels.
8. For permittees with riparian land owners, methods for managing riparian lands to protect water quality.
9. Additional pollutants unique to commercial, industrial, and institutional entities as the need is identified.

## 10. Green stormwater infrastructure development and benefits.

All PEP participating permittees were required to apply for a new MS4 permit in their respective permit cycle years. The following key messages will be covered within the Clinton River Watershed and Lake St. Clair Direct Drainage Collaborative Public Education Plan. This Collaborative PEP was developed and will be implemented to continue meeting the PEP requirements of the 2003 MS4 permit as well as the new MS4 permit going forward.

- A. Promote public responsibility and stewardship in the applicant's watershed(s).
- B. Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.
- C. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.
- D. Promote preferred cleaning materials and procedures for car, pavement, and power washing.
- E. Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.
- F. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.
- G. Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous wastes, travel trailer sanitary wastes, chemicals, and motor vehicle fluids.
- H. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.
- I. Educate the public on and promote the benefits of green stormwater infrastructure and Low Impact Development.
- J. Promote methods for managing riparian lands to protect water quality.
- K. Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to stormwater runoff.

## V. REQUIRED ELEMENTS –EDUCATION ACTIVITIES

Appendix A details the activities and methods that the **Clinton River Watershed Council, Macomb County, Oakland County, and MSU extension will perform on behalf of the participating communities.** The matrix breaks out the activities according to the elements and key messages that they address and describes the target audiences, delivery mechanisms, timeline, responsible parties, and evaluation methods for each activity. An overall evaluation plan is also included in Section VI.



## **VI. EVALUATION PLAN**

A variety of mechanisms will be employed. 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 CRWC 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 Clinton.

Through CRWC's Adopt-A-Stream monitoring program, it is possible to evaluate long-term changes in water quality. The results are compiled in an annual data summary, which allows a simple mechanism for measuring improvements or declines in water quality across the various subwatersheds. This data is managed in a document that records water quality monitoring results for up to the past five years. Improvements in water quality cannot be attributed solely to a successful public education effort, but indicate the overall effectiveness of the stormwater management efforts in the community, subwatershed, and watershed-wide.

## **VII. REPORTING**

The Clinton River Watershed Council will provide a Biennial Progress Report on this Public Education Plan to the Michigan Department of Environmental Quality. This Biennial Report of the watershed wide collaborative PEP is submitted by the CRWC on behalf of Macomb County, Oakland County and the MS4 permit holders that participate in the Stormwater Education Program facilitated by CRWC. Activities facilitated by CRWC, Macomb and Oakland Counties, and the MSU Extension Office will be reported on behalf of the permit holders and their nested MS4s.

## **VIII. APPENDIX A: ACTIVITIES DETAIL TABLE 1**

## **IX. APPENDIX B: COMMUNITY SPECIFIC ACTIONS TRACKING SPREADSHEET**

## **X. APPENDIX C: LETTERS OF COMMITMENT FOR SERVICES AND PROGRAMS**

1. Macomb County Public Works Office
2. Oakland County Water Resources Commissioner's Office
3. MSU Extension

PEP TOPIC	BMP IDENTIFIER	BMP DESCRIPTOR	PARTNER COLLABORATION	TARGET AUDIENCE	Key Message(s) Addressed Green =High Priority Orange= Medium Priority Yellow= Low Priority										FREQUENCY	RESPONSIBLE PARTY	MEASURABLE GOAL	
					PEP Element A - Personal Watershed Stewardship	PEP Element B - Ultimate Storm Water Discharge Locations and Potential Impacts	PEP Element C - Public Reporting of Illicit Discharges	PEP Element D - Car, Pavement PowerWashing	PEP Element E - Pesticides, Herbicides, Fertilizer Education	PEP Element F -Grass Clippings, Leaf Litter, Animal Waste Disposal	PEP Element G - Waste Management Assistance	PEP Element H - Septic System Maintenance	PEP Element I - Benefits of Green Infrastructure LID	PEP Element J - Mgt. of Riparian Lands				PEP Element K - Commercial, Industrial, Institutional Education
Watershed Wide Activities																		
A-C, E-G, I, J	Michigan Green Schools Program	This program was signed into law at the state level in 2006. The program encourages public and private schools to participate in energy savings and environmental activities to be designated as "Michigan Green Schools".	YES	K-12th grade students and teachers	x	x	x		x	x	x		x	x		Annually	Oakland Macomb	Minimum participation of 100 schools annually in each county.
A-G, I,J	River Day	CRWC will recruit, host and promote events. MS4 permit communities will promote River Day events.	YES	Citizens including the general public and county and municipal employees	x	x	x	X	x	x	x		x	x		Annually	CRWC	Promote and publicize a minimum of 15 events annually.
A,B,C,J, K	Clinton Cleanup	CRWC will recruit, host and promote events. MS4 permit communities will promote Clinton Clean Up events. Recruitment of volunteers is targeted to the general public, as wells as commerical, industrial and corporate partners.	YES	Citizens including the general public and corporate employees/volunteers	x	x	x							x	x	Annually In September	CRWC	Host a minumum of 12 events annually 150 volunteers and 150 bags of trash removed.
A,B,C,J, K	Weekly Clean	CRWC will recruit, host and promote weekly clean up in the watershed. Recruitment of volunteers is targeted to commerical, industrial and corporate partners.	YES	Citizens including the general public and corporate employees/volunteers	x	x	x							x	x	33-34 weeks a year	CRWC	<b>Host weekly events beginning in April through the third week of November, with a total volunteer count of 375 and approximately 3,000 lbs of trash removed annually.</b>
A-G, I,J	School Program - Clinton River Water Festival at Oakland University	Participate in the Clinton River Water Festival at Oakland University, providing staff for event planning, registration, volunteer guiding, and presentations at the festival. CRWC and Oakland County representatives serve on the planning committee that meets a minimum of 5 times annually. This water festival educates students in the Oakland County portion of the Clinton River watershed.	YES	4th-5th grade students, teachers; corporate volunteers	x	x	x	x	x	x	x		x	x		Annually in May	Oakland CRWC	Maintain a level of 1100 students per year plus 150 adults chaperones and teachers and 100 volunteers.



A-G, I,J	School Program - Lake St. Clair Water Festival at Macomb Community College	Participate in the Lake St. Clair Water Festival, providing staff for event planning, registration, volunteer guiding, and presentations at the festival. CRWC and Macomb County Public Works representatives serve on the planning committee that meets a minimum of 10 times annually. This water festival educates students in the the the Clinton River, Lake. St. Clair, and Anchor Bay (sub)watersheds.	YES	4th-5th grade students,teachers; corporate volunteers	x	x	x	x	x	x	x	x	x	x	Annually in May	Macomb CRWC	Maintain a level of 1500 participants.
A-J	Stormwater Management Forum	CRWC will plan, promote, and host quarterly stormwater management forums. These forums bring decision makers and stakeholders within our watershed together to share information and discuss relevant topics in stormwater management.	YES	County and Municipal Employees, NGO/NPO employees, MS4 permittees, City Councils, engineers, city planners, public works operators, industrial and commercial facilities management and employees.	x	x	x	x	x	x	x	x	x	x	Quarterly	CRWC	Quarterly forums, at least 1 presenter at each forum with a minimum of 15 attendees.
A-K	Stormwater Education: Community Presentations and Workshops	Presentation on watersheds, stormwater pollution, green infrastructure, and lifestyle practices that preserve and protect water resources. (CRWC will host a minimum of 2 in each subwatershed.) Topics will vary and will be based on host subwatershed requests. CRWC will communicate with webmasters and communication staff of the MS4 permittees community to ensure promotion of events.	YES	Citizens including the general public and county and municipal employees	x	x	x	x	x	x	x	x	x	x	Annually	CRWC	<b>Minimum 14 per year (2 per subwatershed). Attendance is tracked via sign-in sheets and submitted in the biennial report.</b>
A,B,C,J	Adopt-A-Stream Training Workshops	Adopt A Stream training includes one 3-hour workshop on watersheds, stormwater pollution, watershed friendly practices, and training in volunteer monitoring procedures including macroinvertebrate collection and physical assessment. (Minimum of one 3 hr workshop per subwatershed ) Bug Identification Workshops are also held to ensure that each team has at least one bug certified member.	YES	Citizens including the general public and county and municipal employees	x	x	x						x		Continuous	CRWC	<b>Minimum 7 AAS trainings annually (1 per subwatershed). Minimum 2 Bug ID trainings annually.</b>
A,B,C,J	Adopt-A-Stream Volunteer Water Quality Monitoring Program	Coordination of volunteer monitoring teams at pre-selected sites.	YES	Citizens including the general public and county and municipal employees	x	x	x						x		Biannually	CRWC	Monitor a minimum of 35 locations, with a minimum of 100 volunteers on the first Saturday in May and the first Saturday in October.

A-K	Subwatershed Website	Hosted by CRWC website; features subwatershed map, photos, description, events and links to education resources.	YES	Citizens including the general public and county and municipal employees	x	x	x	x	x	x	x	x	x	x	x	Continuous	CRWC	Continue to maintain page and update information and verify participating communities links to this website. Website admin (CRWC) can view number of website hits and will submit in biennial report.
A-C,E,F,I,J	Stream Leaders Student River Monitoring Program	The mission of the Stream Leaders program is to raise young people's awareness of the importance of water quality; and to help cultivate a connection to a Great Lakes stewardship identity. This is accomplished through a multidisciplinary, place-based initiative that provides students with an educational experience in water quality monitoring, data interpretation, and citizen action. Students and teachers perform biological, physical, and chemical stream monitoring assessments. They then interpret and analyze stream data and submit it to CRWC to corroborate.	YES	K-12th grade students, teachers and chaperones	x	x	x		x	x			x	x		Program is continuous; Actual monitoring events in April/May and October.	CRWC	Retain participation of a minimum of 3,100 students and 20 schools per year, weather permitting.
A, D-F, H-J	RiverSafe LakeSafe	Educational outreach survey tool offering homeowners the opportunity to become certified "RiverSafe LakeSafe" by CRWC if they commit to the series of household water quality BMPs at home that reduce stormwater pollution and protect local fresh surface waters. Encourage MS4 permit communities to become certified and promote through City Council, beautification boards, planning committees, or other local committees.	YES	Home/Property owners	x			x	x	x			x	x	x	Continuous	CRWC	add a minimum of 10 new certifications a year
I-K	WaterTowns	CRWC's place making initiative focused on connecting communities to their waterways through education, green infrastructure, history, art and ecology. Municipalities are equipped with complete shovel ready green infrastructure project designs custom for their community and are given the opportunity to implement a GI project, providing an educational opportunity for the public to get involved through native plantings, educational signage, etc.	YES	Municipal Employees, property developers, general public									x	x	x	Continuous	CRWC	bring on a minimum of 2 new communities a year to the WaterTowns program



I-K	Stormwater Education: Industrial and Commercial Facilities	Provide educational materials and BMP fact sheets to industrial and commercial facilities. Target 2 industrial/commercial sectors per year. Distribute BMP information via email that is created specifically for each sector.	YES	Employees and property owners at industrial and commercial facilities. Property developers, planners, engineers.	x														Macomb; Oakland; CRWC; MS4 Permittes	Target 2 sectors per year. Distribute BMP fact sheets through annual email blast to designated contact at each facility. Track distribution via list of businesses and emails sent.
I-K	Stormwater Education: Industrial and Commercial Facilities	Attend Regional Chamber of Commerce Networking events to build relationships with business owners and share information related to stormwater pollution prevention for business/industry.	YES	Employees and property owners at industrial and commercial facilities. Property developers, planners, engineers.	x														CRWC	Attend a minimum of 2 events annually.
A-K	Social Media Outreach	Use social media platforms (Facebook, Twitter, Instagram) to collaborate among partners for cross promotion of events, fundraisers, news, education, and community announcements.	YES	Citizens including the general public and county and municipal employees	x	x	x	x	x	x	x	x	x	x	x	x	x	x	CRWC	Track total monthly response and interactions such as likes, comments, and shares on Facebook, likes, responses, and retweets on Twitter, and likes on Instagram.
<b>Macomb County Specific Activities</b>																				
A-K	Public Works Presentations	Presentations are offered to school and adult groups. These presentations educate citizens on pollution prevention in our waterways in order to improve the quality of life and promote economic prosperity with clean water.	YES	General Public in Macomb County	x	x	x	x	x	x	x	x	x	x	x	x	x	Annually	Macomb	30 presentations per year
A-D,K	Clean Boating	Inform and promote clean boating practices with including pollution prevention, spill notification and invasive species control	YES	General Public	x	x	x	x									x	Seasonally	Macomb	Meet with local boating association once a year and hand out 50 flyers promoting current pollution prevention initiatives.
A,K	MSU Extension Understanding Groundwater	This presentation targets 4th through 6th graders. Using a groundwater model and hands on activities, students review basic water knowledge, learn what groundwater is, the surface/groundwater connection and the importance of protecting and conserving groundwater resources.	YES	Elementary students and educators	x												x	Annually	Macomb	Participation is tracked, based on school requests for the program and availability of staff
A-D, G,H,K	MSU Extension Water Conservation Program	Designed for 1st through 3rd graders. The children explore water conservation topics such as where water comes from, how to use water wisely, and how to protect and conserve this precious resource.	YES	Elementary students and educators	x	x	x	x									x	Annually	Macomb	100 classroom presentations per year

A,E,F,I,K	MSU Extension Master Gardener Program	The Michigan State University Extension Master Gardener Program is an adult horticulture education and volunteer leader training program. Volunteers are committed to improving the quality of life in Michigan through horticulture-based volunteerism and beautifying communities throughout the state.	YES	Citizens	x				x	x			x	x	Annually	Macomb	50 active volunteers providing 2,000 hours of volunteer service.
A,E,F,I,K	MSU Extension Master Composter Program	The Master Composter course instructs residents about yard waste composting and reduction. This shows the importance of improving your yard at little cost, with little odor or attracting critters, and teaches how to reduce waste that must be disposed. This program gives correct knowledge that can be shared through volunteer activities.	YES	General Public	x				x	x			x	x	Annually	Macomb	5 active volunteers providing 100 hours of volunteer service.
A-C, E,F,J,K	MSU Extension Sea Grant Summer Discovery Cruises	Summer Discovery Cruises offer anyone interested in exploring Lake Erie, the Detroit River and Lake St. Clair the opportunity to get out on the water for an education experience.	YES	General Public	x	x	x		x	x			x	x	Seasonally	Macomb	250 participants per year
A,E,F,K	MSU Extension 4-H Environmental and Outdoor Education	Programs focus on teaching environmental responsibility and stewardship. This 4-H program area provides educational opportunities for youth to enjoy the outdoors and learn about the interconnection of people and nature.	YES	Youth	x				x	x				x	Annually	Macomb	1,000 youth per year mentored and educated by 100 adult and teen volunteers to deliver their programs.
A-K	MSU Extension Public Education Classes	Homeowner classes on environmentally safe maintenance	YES	General Public	x	x	x	x	x	x	x	x	x	x	Annually	Macomb	25 attendees per year
A-K	Facility Tours	On-site tours of Macomb County facilities are available relating to environmental impacts to the Clinton River and Lake St. Clair. Tours focus on what the county is doing to improve our water resources and to educate the public on how they can help.	YES	General Public	x	x	x	x	x	x	x	x	x	x	Annually	Macomb	Engage 20 participants per year.
A,B,C,G	Household Hazardous Waste Collection	The Macomb County Health Department sponsors hazardous waste collection drop-off sites for proper disposal. This includes fluorescent bulbs, used oil & oil filters, mercury thermometers, PCBs, etc.	YES	Macomb County Residents	x	x	x				x				Annually	Macomb	Host six events per year and a collection goal of 100,000 pounds of waste from participating residents



A,G	Medication Disposal	Low concentrations of prescription drugs, including opiates, and over the counter medications have been detected in the drinking water supplies of 24 major metropolitan areas throughout the country, including Detroit. Contributing to the problem is the disposal dilemma faced by residents who want to safely dispose of unwanted medications without flushing them down the drain. The Macomb County Health Department is partnering with local pharmacies to accept unwanted and expired medications.	YES	General Public	x											Annually	Macomb	Collect 1,000 pounds of unwanted medication annually. Data is collected from sheriff's department.
A,I-K	The Blue Economy Initiative	Macomb County's Blue Economy Initiative is designed to protect and enhance Macomb County's assets, Lake St. Clair and the Clinton River Watershed. Its objectives are to increase public access and cultivate investment while maintaining high standards for environmental stewardship.	YES	General Public	x								x	x	x	Annually	Macomb	Annually host a lake event.
	Lake St. Clair Initiative Circle the Lake Tour	Macomb County Planning and Economic Development created this public/private, non-profit association to increase the awareness, protect, and develop the rich and diverse assets on and around this fresh water community.	YES	General Public	x											Annually	Macomb	Distribute 500 maps through municipalities and tourism events.
A,J	Clinton River Blue Way Water Trail	Macomb Count created a Blue Way Water Trail to increase awareness of the natural assets the county possesses and create opportunities to publicize and increase access to the Clinton River.	YES	General Public	x									x		Annually	Macomb	Distribute 200 water trail maps through the CRWC.
A,E,J	Phragmites Invasive Removal	The intent of the project is to protect coastal marshes (wetlands) within the St. Clair watershed through the control of common reed, or phragmites. Treatment includes aerial and ground application of herbicide, followed by either prescribed burning or mowing.	YES	General Public	x											Seasonally	Macomb	Attend 4 CISMA meetings per year.
A,B,J	Spill Awareness	Macomb County will promote a citizens awareness program for spill response and how to notify proper authorities for clean up if necessary.	YES	Homeowners, visitors, and business owners within Macomb	x	x										Annually	Macomb	Attend 1 Emergency Response meeting a year to update and report procedures.
A-K	Bulletin Boards/ Displays	Bulletin boards in the designated county buildings on clean water topics. Other related information is posted and/or materials are placed for public/county employees to take. Display booths at county events and other events as requested.	YES	General public, Macomb County employees	x	x	x	x	x	x	x	x	x	x		Quarterly	Macomb	flyers and topics to be rotated at least 4 times per year. Materials are counted before and after each event

A-C, G, I, J	Macomb County Social Media Sites	All the nested Macomb County departments keep the Macomb County communities informed on the many projects, services provided, and highlights some of the ongoing projects and services going on in the county through various forms of social media. These resources also provide updates about events and education the citizens can participate in around the county. The main county website is: <a href="http://www.macombgov.org/">http://www.macombgov.org/</a> .	YES	General public, Macomb County employees	x	x	x									Updated on a regular basis	Macomb	Provide working links to websites and pages. Track hits on websites and social media pages
A-K	Publications	Publicize environmental stewardship, pollution prevention, best management practices and other relevant environmental activities to Macomb County staff, the general public and business/industry	YES	General public, Macomb County employees	x	x	x	x	x	x	x	x	x	x	x	Annually	Macomb	distribute at least 150 publications through direct mailing or email each year
A-K	Riparian Information	Make available riparian landowner educational materials at events, meetings, and through mailings.	YES	General Public, Riparian Landowners	x	x	x	x	x	x	x	x	x	x	x	Annually	Macomb	Educate at least 12 riparian residents a year through inquiries.
<b>Macomb County NON-REQUIRED Activities</b>																		
A,B,G,K	Board of Commissioners Earth Day Contest	Macomb County will promote and sponsor an Earth Day contest for 4th & 5th grade students in the county.	YES	Elementary students	x	x										Annually	Macomb	Have at least 10 participants per year.
A,B,E,F,I<K	Green Macomb	The Macomb County Department of Planning & Economic Development is developing a new initiative to support green infrastructure efforts that strengthen the economic vitality, quality of life, and environmental wellbeing for those visiting, living, and working in Macomb County.	YES	General Public	x	x			x	x						Annually	Macomb	Plant 50 trees a year and attend one event per year.
A,J	HEART Freshwater Center	The HEART Freshwater Center is a unique alliance of agencies working together to study the Huron to Erie Corridor through research, education and training. The purpose of this research is to improve the ecosystems of these water bodies and the quality of life for the people who use them.	YES	General Public	x											Annually	Macomb	Work with lab two times a year on water quality event/testing.
<b>Oakland County Specific Activities</b>																		



A-C, G, I-K	Regional Stormwater Summit	This annual event, which debuted in 2013, features presentations on stormwater and watershed initiatives in the southeast Michigan and the Great Lakes region that are relevant in helping communities work together and gain insight into addressing the region's stormwater and watershed management challenges.	YES	Citizens including the general public and county and municipal employees	x	x	x									Annually in the Fall (September/October)	Oakland	Maintain a minimum 100 participants annually from southeast MI
A-K	Bulletin Boards	Bulletin boards in the WRC Public Works Building main lobby and framed posters in the vestibule of the WRC Water and Sewer Billing Office in Waterford are posted with information developed by the Southeast Michigan Partners for Clean Water on the "Seven Simple Steps to Clean Water" topics. Other related information is posted and/or materials are placed on the front desk of the Public Works Building main lobby for the public/county employees to take.	YES	General public, CVTs, county employees within Oakland County	x	x	x	x	x	x	x	x	x	x		Monthly	Oakland	Topics posted are tracked in an excel spreadsheet available upon request. Topics posted will be reported annually
A-C E-G, I	Dirt Doctors Program	The Dirt Doctors Program is an interactive program facilitated by WRC staff geared towards 4th and 5th grade students and teaches youth about how individual actions affect our waterways. The program focuses on the importance of soil erosion prevention and watershed stewardship.	YES	Oakland County 4th-12th grade students, teachers and chaperones	x	x	x		x	x	x					Annually	Oakland	Minimum of 25 programs annually
A-C, H	Drain Detectives Program	The Drain Detectives Program is an interactive program facilitated by WRC staff geared towards 4th through 12th grade students. It teaches students how pollution can get into our waterways, what to look for, how to detect it and how to trace the source of the pollution. Students learn how they can help prevent pollution and how to report pollution incidents through Oakland County's 24-Hour Pollution Hotline. Students also learn how water and pollution travel through the watershed.	YES	Oakland County 4th-12th grade students, teachers and chaperones	x	x	x						x			Annually	Oakland	Minimum of 5 programs over the permit cycle
A-J	Enviroscape Watershed Model Program	The Enviroscape watershed model teaches students about watersheds and how individual actions affect our waterways, as well as how pollution moves throughout a watershed. Students are taught how to prevent pollution through everyday actions. The model is programming is facilitated by WRC staff The Enviroscape is also made available to the public to borrow for presentations.	YES	General public, Oakland County students	x	x	x	x	x	x	x	x	x			Annually	Oakland	Minimum of 10 programs annually

A-C, G, I, J	E-newsletter Articles	<p>WRC releases an electronic newsletter to the public, CVTs, elected officials and county employees on a quarterly basis (the E-newsletter has taken the place of the WRC Watermark newsletter). This newsletter keeps Oakland County communities informed on the many projects and services provided by the WRC and highlights some of the WRC's ongoing projects and services. It also provides updates about the evolving role of the WRC office.</p>	YES	General public, CVTs, elected officials, and county employees in Oakland County	x	x	x										Published quarterly	Oakland	Minimum of 4 newsletters annually
A-K	Household Hazardous Waste Information	<p>Continue to publicize information on the NO HAZ, Resource Recovery and Recycling Authority of Southwest Oakland County (RRRASOC) and Southeastern Oakland County Resource Recovery Authority (SOCRRA) programs to citizens and employees of Oakland County on WRMD's Web site (<a href="http://www.oakgov.com/waste/nohaz">www.oakgov.com/waste/nohaz</a>). NO HAZ, RRRASOC and SOCRRA provide safe disposal of household hazardous waste to Oakland County municipalities to the maximum extent practicable (as budget allows). The WRC will continue to distribute HHW brochures.</p> <p>WRC also provides an ad on household hazardous waste disposal in the Oakland Lakefront magazine and has information in its Waterfront Wisdom publication and on their Web site at <a href="http://www.oakgov.com/riparian">www.oakgov.com/riparian</a>.</p>	YES	Residents	x												Annually	Oakland	<p>Maintain working links to Web sites and track number of website hits annually</p> <p>Hold a minimum of four collection events per year</p> <p>Collect and properly dispose of a minimum of 200,000 pounds of household hazardous waste per year</p>
A-K	Kids' Clean Water Calendar Contest	<p>The Kids' Clean Water Calendar contest is open to all 4th and 5th grade students in all schools within Oakland County. Themes for drawing entries surround the Seven Simple Steps to Clean Water campaign topics developed by SEMCOG. The contest promotes the students to learn about watershed stewardship and how our daily actions impact our waterways.</p>	YES	General public, Oakland County 4th and 5th grade students	x	x	x	x	x	x	x	x	x	x	x	x	Annually	Oakland	<p>Achieve participation of a minimum of 600 students per year</p> <p>Distribute a minimum of 5,000 calendars per year throughout Oakland County</p>



A, I, J	Natural Resources Education Program	Special programs are offered by Oakland County Parks and Recreation Commission (OCPRC) staff throughout the year which provide opportunities for the community to participate in ongoing stewardship efforts. Programs take place at the Oakland County Parks as well as other locations in Southeast Michigan. Stewardship opportunities are posted on OCPRC's Web site at: <a href="http://www.destinationoakland.com">www.destinationoakland.com</a>	YES	General public, visitors to the area	x																						Oakland	Hold a minimum of 10 stewardship events per year with participation from a minimum of 200 individuals per year
A-K	Oakland County Environmental Stewardship and Water Resource Web sites	WRC, Oakland County Planning and Economic Development Services (OCPEDS), Road Commission of Oakland County (RCOC), OCPRC and MSU-Extension Oakland County maintain environmental stewardship and/or water resource information on their Web sites at: <a href="http://www.oakgov.com/es">www.oakgov.com/es</a> , <a href="http://www.oakgov.com/riparian">www.oakgov.com/riparian</a> , <a href="https://www.oakgov.com/parks/getinvolved/Pages/Natural-Resource-Management.aspx">https://www.oakgov.com/parks/getinvolved/Pages/Natural-Resource-Management.aspx</a> , <a href="http://www.rcocweb.org/Environmental/Environmental.aspx">http://www.rcocweb.org/Environmental/Environmental.aspx</a> , and <a href="http://www.oakgov.com/msu/">http://www.oakgov.com/msu/</a> . Information will also be provided via the Be Phosphorus Smart! Web site, which is a portal to information on phosphorus and its role in and impacts on crops, turf and lawn care, and stormwater ( <a href="http://www.bephosphorusmart.msu.edu/">http://www.bephosphorusmart.msu.edu/</a> )	YES	General public, CVTs, county employees	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	Oakland MSUE Oakland	Provide working links to Web sites and track number of website hits annually
A	Oakland Lakefront Magazine Advertisements	Public education messages are placed in the Oakland Lakefront magazine. The messages include pet care, fertilizers, household hazardous waste disposal, earth-friendly landscaping, car care and storm drain awareness. Oakland Lakefront is published monthly and reaches approximately 17,000 homeowners on the waterways of Oakland County.	YES	General public, riparian landowners	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	Oakland	Place six (6) ads per year Reach a minimum of 13,000 lakefront residents per ad per year
A-K	Publicize Environmental-Related Events	Publicize environmental stewardship and other relevant environmental activities to WRC staff and the general public through in-house bulletin boards in WRC lobby. Oakland County also has a Web portal where this information is available at: <a href="https://www.oakgov.com/parks/getinvolved/Pages/Natural-Resource-Management.aspx">https://www.oakgov.com/parks/getinvolved/Pages/Natural-Resource-Management.aspx</a>	YES	General Public, visitors to the area, WRC staff	x																						Oakland	Publicize a minimum of 20 natural-resource related events per year Maintain working links to Web sites and track number of website hits annually

G	Recreational Vehicle Waste Dumpsites	Post links and/or locations to recreational vehicle (RV) waste dumpsites in the region on Southeast Michigan Council of Government's (SEMCOG) Ours to Protect Web site at: <a href="http://www.semco.org/OursToProtect_HouseholdWaste.aspx">www.semco.org/OursToProtect_HouseholdWaste.aspx</a> and provide a link to Michigan RV dump sites ( <a href="http://www.rvdumps.com/mi.htm">www.rvdumps.com/mi.htm</a> ) on Oakland County Waste Resource Management Division's Web site at: <a href="http://www.oakgov.com/waste/">www.oakgov.com/waste/</a> .	YES	Residents, visitors to the area													Annually	Oakland	Provide working links to Web sites and track number of website hits annually to Oakland County's Waste and Recycling Resources page will be tracked annually
A-K	Riparian Information Distribution	Distribute riparian landowner educational material (i.e. Waterfront Wisdom brochure) at events, meetings, and through mailings.  Maintain WRC's riparian education Web site ( <a href="http://www.oakgov.com/riparian">www.oakgov.com/riparian</a> )	YES	General Public, Riparian Landowners	x	x	x	x	x	x	x	x	x	x	x	x	Annually	Oakland	Maintain working links to Web sites and track number of website hits annually  Distribute a minimum of 100 Waterfront Wisdom booklets per year
A, G	Solid Waste Plan	Continue to implement Oakland County's Solid Waste Plan which establishes an enforceable program and processes that when implemented will minimize future adverse impacts upon public health, the environment and the landscape as a result of the generation, handling, processing and disposal of Act 451, Part 115 non-hazardous solid wastes.	YES	Residents	x							x					Annually	Oakland	Provide working link to Web site and track number of website hits annually
A-K	Inland Lake Natural Shoreline/Education Program	The MDEQ and MSU-Extension has spearheaded the development of the Michigan Natural Shoreline Partnership (MNSP). Each year, education and outreach is provided to inland lake homeowners and shoreline landscape contractors on the following topics: the importance of natural shoreline landscapes on Michigan's inland lakes, healthy lake ecosystems, understanding the shoreline, shoreline invasive plants, planning a natural shoreline landscape, design ideas for a natural shoreline landscape, plant selection, planting stock and site preparation, natural shoreline success, and Michigan rules and regulations. In Oakland County, a partnership has formed between the WRC, MSU-Extension, OCPRC, Clinton River Watershed Council, Wild Ones, Oakland Conservation District and MDEQ to offer programming locally.	YES	General Public, Riparian Landowners	x	x	x	x	x	x	x	x	x	x	x	x	Annually	Oakland	Report annually: -Number of programs held -Number of attendees -Workshop partners  Host and participate in at least one program annually in Oakland County





A,C,G	Household Hazardous Waste Information	<p>Continue to publicize information on the NO HAZ, Resource Recovery and Recycling Authority of Southwest Oakland County (RRRASOC) and Southeastern Oakland County Resource Recovery Authority (SOCRRA) programs to citizens and employees of Oakland County on WRMD's Web site (<a href="http://www.oakgov.com/waste/nohaz">www.oakgov.com/waste/nohaz</a>). NO HAZ, RRRASOC and SOCRRA provide safe disposal of household hazardous waste to Oakland County municipalities to the maximum extent practicable (as budget allows). Oakland County MS4 permittees will also promote.</p> <p>The WRC will continue to distribute HHW brochures.</p> <p>WRC also provides an ad on household hazardous waste disposal in the Oakland Lakefront magazine and has information in its Waterfront Wisdom publication and on their Web site at <a href="http://www.oakgov.com/riparian">www.oakgov.com/riparian</a>.</p>		Residents	x		x				x							Continuous	MS4 Permittees	Provide working links to websites. MS4 permit communities have an excel document to track link locations and website hits.
A,G	Recreational Vehicle Waste Dumpsites	<p>Post links and/or locations to recreational vehicle (RV) waste dumpsites in the region on Southeast Michigan Council of Government's (SEMCOG) Ours to Protect Web site at: <a href="http://www.semco.org/OursToProtect_HouseholdWaste.aspx">www.semco.org/OursToProtect_HouseholdWaste.aspx</a> or provide a link to Michigan RV dump sites (<a href="http://www.rvdumps.com/mi.htm">www.rvdumps.com/mi.htm</a>) on Oakland County Waste Resource Management Division's Web site at: <a href="http://www.oakgov.com/waste/">www.oakgov.com/waste/</a>. MS4 may add this to thier SWMP</p>		Residents, visitors to the area	x						x							Continuous	MS4 Permittees	Provide working links to websites and track number of hits. MS4 permit communities have an excel document to track link locations and website hits.
A-J	Riparian Information Distribution	<p>Distribute riparian landowner educational material (i.e. Waterfront Wisdom brochure) make available to their public via mailings or through their website. events, meetings, and through mailings. MS4 may add this to thier SWMP</p> <p>Maintain WRC's riparian education Web site (<a href="http://www.oakgov.com/riparian">www.oakgov.com/riparian</a>)</p>		General Public, Riparian Landowners	x	x	x	x	x	x	x	x	x	x	x		Continuous	MS4 Permittees	Provide working link to website and track number of hits. MS4 permit communities have an excel document to track link locations and website hits.	







**Candice S. Miller**

Public Works Commissioner  
Macomb County

March 15, 2023

Lishba Varughese  
Christine Caddick  
EGLE-Water Resources Division  
Southeast Michigan District Office  
27700 Donald Court  
Warren, MI 48093

RE: Watershed-wide Public Education Plan Submittal for the Clinton River Watershed

Dear Lishba Varughese & Christine Caddick:

The Macomb County Public Works Office is writing to affirm its commitment to assist communities in implementing the collaborative Public Education Plan (PEP) that has been developed for the storm water permit holders within the Clinton River Watershed.

The Macomb County Public Works Office understands that the PEP is a requirement of the National Pollutant Discharge Elimination System (NPDES) permit administered by the Michigan Department of Environmental Quality. The permit regulates stormwater discharges from municipal separate storm sewer systems, in compliance with the provisions of the Federal Water Pollution Control Act (Clean Water Act), as amended (33 U.S.C. 1251 et seq), and Michigan Act 451, Public Acts of 1994, as amended, Parts 31 and 41.

The Macomb County Public Works Office is included as a responsible party for the implementation of a variety of actions in the PEP because many of our activities and programs offer excellent opportunities for engaging the public in watershed education and environmental stewardship.

If you have any questions, please feel free to contact Jeff Bednar, Environmental Resources Manager, at [jeff.bednar@macombgov.org](mailto:jeff.bednar@macombgov.org) or (586)493-0685.

Sincerely,

Candice S. Miller, Commissioner  
Macomb County Public Works



March 7, 2023

Ms. Lishba Varughese  
Ms. Christine Caddick  
EGLE – Water Resources Division  
Southeast Michigan District Office  
27700 Donald Court  
Warren, MI 48093

RE: Watershed-wide Public Education Plan Submittal for the Clinton River Watershed

Dear Ms. Varughese and Ms. Caddick:

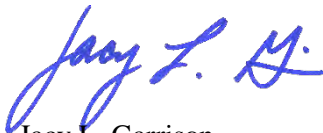
The Oakland County Water Resources Commissioner's Office (WRC) is writing to affirm its commitment to assist communities in implementing the collaborative Public Education Plan (PEP) that has been developed for the stormwater permit holders within the Clinton River Watershed.

The WRC recognizes that the PEP is a requirement of the National Pollutant Discharge Elimination System (NPDES) administered by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The permit regulates stormwater discharges from municipal separate storm sewer systems, in compliance with the provisions of the Federal Water Pollution Control Act (Clean Water Act), as amended (33 U.S.C. 1251 et seq), and Michigan Act 451, Public Acts of 1994, as amended, Parts 31 and 41.

Oakland County is included as a responsible party for the implementation of a variety of actions in the PEP because many of our activities and programs offer excellent opportunities for engaging the public in watershed education and environmental stewardship.

If you have any questions, please feel free to contact me at 248-858-5264.

Sincerely,



Jacy L. Garrison  
Environmental Planner

March 21, 2023

Ms. Kaleigh Snoddy  
Clinton River Watershed Council  
1115 W Avon Rd.  
Rochester Hills, MI 48309

Re: Clinton River Watershed Collaborative Public Education Plan

Dear Ms. Snoddy,

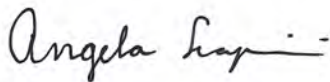
The Michigan State University (MSU) Extension assists communities in water related education programs that can be helpful in implementing the collaborative Public Education Plan (PEP) that has been developed for the stormwater permit holders within the Clinton River Watershed.

MSU Extension recognizes that the PEP is a requirement of the National Pollutant Discharge Elimination System (NPDES) administered by the Michigan Department of Environmental Quality. The permit regulates stormwater discharges from municipal separate stormwater sewer systems, in compliance with the provisions of the Federal Water Pollution Control Act (Clean Water Act), as amended (33 U.S.C. 1251 et seq), and Michigan Act 451, Public Acts of 1994, as amended, Parts 31 and 41.

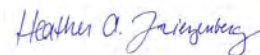
MSU Extension is included as a responsible party for the implementation of a variety of actions in the PEP because many of our activities and programs offer excellent opportunities for engaging the public in watershed education and environmental stewardship. Furthermore, the programming and resources offered are science-based and delivered through a collaboration of academic staff, specialists, and faculty from Michigan State University in partnership with local organizations and agencies. When possible, programming is offered as both classroom and field-based learning opportunities, and is tailored to meet the specific areas of interest and needs of the target audience. These programs may include the Water Conservation Program, Summer Discovery Cruises, and Michigan Conservation Stewards Program.

If you have any questions, please feel free to contact me at (586) 469-5060 or [scapinia@msu.edu](mailto:scapinia@msu.edu).

Sincerely,



Angela Scapini  
Extension Program Worker  
Michigan Sea Grant, MSU Extension



Heather Triezenberg  
Associate Director & Program Leader  
Michigan Sea Grant, MSU Extension

Cc: Ed Scott, District 11 Director, MSU Extension  
Dave Ivan, Director, Community, Food, and Environment Institute, MSU Extension



# Appendix D

## SEMCOG Posters & Illicit Discharge Poster

## How to Spot Illicit Discharges

### Sanitary Sewer Discharge

#### Observations:

- Sanitary Debris
- Staining on pipe
- Heavy Foam
- Gray or Discolored Water
- Odors (sewage, chlorine, rotten eggs and detergents)



### Illegal Dumping, Spills, or Floor Drain

#### Connection Observations:

- Oily Sheen
- Trash, non-sanitary debris
- Petroleum odors
- Stained sediment, rocks, and vegetation
- Vehicle bay washout



### Agricultural Runoff, Fertilizers, or Sanitary Sewer Waste Observations:

- Algae growth at or near outlet
- Heavy vegetation at or near outlet



### What to Report

- **Spills and Contamination to lakes, river and streams**  
District Stormwater Coordinator, MDEQ, Environmental Health Department, Drain Commissioner's Office
- **Suspicious dumping or discharges from pipes**  
District Stormwater Coordinator, MDEQ, Environmental Health Department, Drain Commissioner's Office
- **Sewage on the ground or in surface water**  
District Stormwater Coordinator, Environmental Health Department
- **Large number of dead fish in waterways**  
District Stormwater Coordinator, MDEQ, Environmental Health Department
- **Failing or leaking septic systems**  
District Stormwater Coordinator, Environmental Health Department
- **Construction site soil erosion to waterways**  
District Stormwater Coordinator, local SESC Enforcing Agency
- **Polluted runoff from storage piles/dumpsters entering waterways**  
District Stormwater Coordinator, Environmental Health Department, Drain Commissioner's Office

### Important Numbers

#### Emergency Call 9-1-1

- Pollution Emergency Alerting System (PEAS) **1-800-292-4706**
- 24 Hour Spill Hot Line – Arch Environmental Group **1-248-522-2821**

#### Non-Emergency

- School District Contact Number
- DEQ Environmental Assistance Center **1-800-662-9278**
- Eaton County Drain Commissioner **1-800-292-4706**
- Genesee County Drain Commissioner **1-810-732-2940**
- Livingston County Department of Public Health **1-517-546-9858**
- Macomb County Public Works **1-877-679-4357**
- Oakland County Water Resources **1-248-858-0958**
- Washtenaw County Drain Commissioner **1-724-222-6860**
- Wayne County Department of the Environment **1-888-223-2363**



**KEEP OUR WATER CLEAN**



**onewater**

[mionewater.com](http://mionewater.com)



**IF YOU SEE POLLUTION,  
REPORT IT**



# KEEP OUR WATER CLEAN



onewater

[mionewater.com](http://mionewater.com)

# CLEAN UP AFTER YOUR PETS



# **BUILD ON WATER QUALITY**



**onewater**

[mionewater.com](http://mionewater.com)

# **DISPOSE OF ALL GREASE IN THE TRASH**



# **BUILD ON WATER QUALITY**



# **ONLY RAIN DOWN THE STORM DRAIN**



# Remember, you're not just washing your car

Our Water. Our Future.



Ours to Protect



## Practice good car care

Did you know there are over four million vehicles in Southeast Michigan? **Practicing good car care helps protect our lakes and streams.**

How? Storm drains and roadside ditches lead to our lakes and streams. So, if motor fluids or dirty water from washing our cars are washed or dumped into the storm drain, it pollutes our local waterways.

What can you do? Simple. **Keep your car tuned and fix leaks** promptly, **recycle used motor oil** and other fluids, **take your car to the carwash or wash your car on the grass.**

Find out more at [www.semcog.org](http://www.semcog.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Remember, you're not just fertilizing your lawn

Our Water. Our Future.



## Fertilize sparingly and carefully

Storm drains found in our streets and yards empty into our lakes and streams. So, **when we fertilize our lawn we could also be fertilizing our lakes and streams**. While fertilizer is good for our lawn, it's bad for our water. Fertilizer in our lakes and streams causes algae to grow. Algae can form large blooms and uses up oxygen that fish need to survive. With 1.5 million homes in Southeast Michigan, all of us need to be aware of the far-reaching effects of our lawn care practices.

**What can you do?** Simple. Use a **no or low phosphorus fertilizer**, select a **slow release** fertilizer where at least half of the nitrogen is water insoluble (check the ingredients on the label), keep fertilizer away from lakes, streams, and storm drains, and **sweep excess fertilizer** back onto your lawn. Not only will our lakes and streams thank you, but so will your pocketbook!

Find out more at [www.semco.org](http://www.semco.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Seven Simple Steps to Clean Water

Our Water. Our Future.



**1.** Help keep pollution out of storm drains

**2.** Fertilize sparingly and carefully

**3.** Carefully store and dispose of household cleaners, chemicals, and oil

**4.** Clean up after your pet

**5.** Practice good car care

**6.** Choose earth friendly landscaping

**7.** Save water

**Our Water. Our Future. Ours to Protect.**

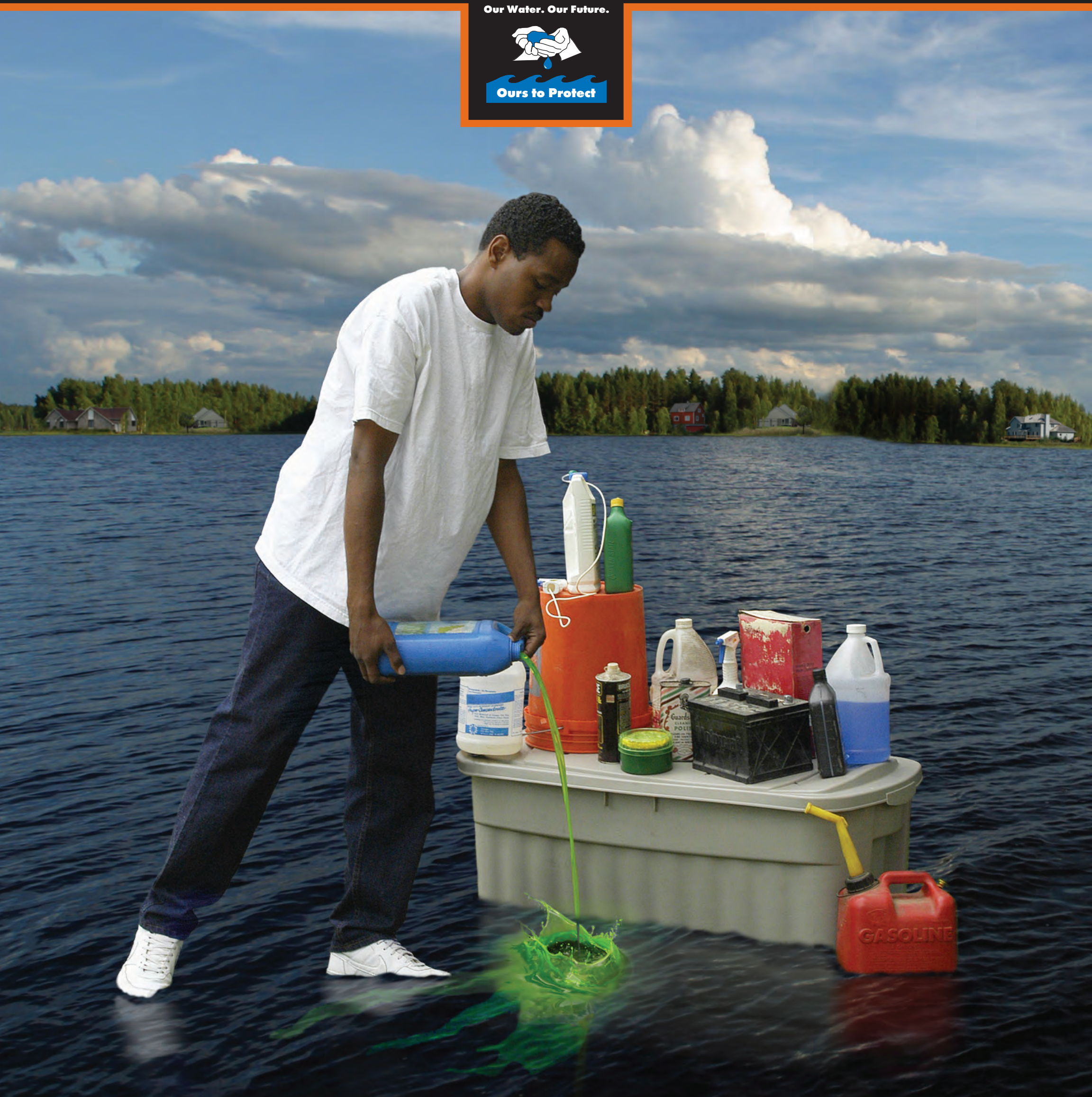
Find out more at [www.semco.org](http://www.semco.org).

Brought to you by the Southeast Michigan Partners for Clean Water.  
Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Remember, it's not just toxic to you

Our Water. Our Future.



## Carefully store and dispose of household cleaners, chemicals, and oil

Did you know that many **household products are dangerous to our pets, kids, and the environment?**

These materials get into our lakes and rivers if washed or dumped into a storm drain or roadside ditch.

What can you do? Simple.

**Proper disposal is key.** Take household cleaners, pesticides, gasoline, antifreeze, used oil, and other dangerous products to your **community's household hazardous waste collection day.** Contact your community for more information on these events.

Find out more at [www.semco.org](http://www.semco.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Remember, you're not just getting rid of weeds and pests

Our Water. Our Future.



Ours to Protect



## Choose earth-friendly landscaping

Did you know you can **protect your kids, pets, and the environment** from the harmful effects of herbicides & pesticides by choosing earth-friendly landscaping? These chemicals wash off our lawns and gardens into our storm drains, which lead to our lakes and rivers.

What can you do? Simple.

**Spot treat for specific pests and weeds or remove by hand.** Mulch around plants. **Water your lawn only when it needs it.** Attract butterflies and birds by **adding plants that are native to Southeast Michigan.**

Find out more at [www.semco.org](http://www.semco.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Remember, you're not just walking the dog

Our Water. Our Future.



Ours to Protect



## Clean up after your pet

Did you know that pet waste has bacteria that makes our lakes and rivers unsafe for swimming and other recreational activities?

That happens when **pet waste left on sidewalks or yards gets washed into storm drains**

or roadside ditches that lead directly to our lakes and rivers.

What can you do? Simple.

No matter where you are **dispose of your pet's waste promptly** in the toilet or trash.

Find out more at [www.semco.org](http://www.semco.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Remember, it ALL drains to our lakes and rivers

Our Water. Our Future.



Ours to Protect



## Keep pollution out of storm drains

Storm drains and roadside ditches lead to our lakes and streams. **So, any oil, pet waste, leaves, or dirty water from washing your car or other outside activities** that enters a storm drain gets into our lakes and streams.

How can you help? Simple. **Use a broom instead of a hose** to clean your driveway. Keep leaves, grass clippings, and trash away from the storm drain, and **never dump motor oil, pet waste, or dirty, soapy water** down the storm drain. **Remember, only rain in the drain!**

Find out more at [www.semcog.org](http://www.semcog.org).

Brought to you by the Southeast Michigan Partners for Clean Water.

Support provided by SEMCOG, the Southeast Michigan Council of Governments (313-961-4266) and the Rouge River National Wet Weather Demonstration Project.



# Vehicle Fluid Tips

Pollution prevention



Keep lids closed



Avoid placing near floor drains



Keep tops of barrels clean



Clean out secondary containment pallets monthly



Containers should have a clear, readable label



Keep floor clean (of spills and oil dry)





# Keeping it Clean

## Municipal operations for clean water

### Dumpsters and loading docks

- Keep dumpster lids closed and inspect for leaks.
- Never place hazardous waste in a dumpster or trash bin.
- Do not leave out the dumpster interior or loading docks. Apply absorbent over any fluids spilled in the dumpster.
- Check loading and unloading equipment regularly for leaks.



### Vehicle and equipment fueling

- Look for and report leaks on vehicles when adding fuel.
- Use secondary containment when transferring fuel from the tank truck to the fuel tank. Cover storm drains in the vicinity during transfer.
- Place spill cleanup materials where they are readily accessible.
- Clean up small spills with absorbent materials rather than hosing down the area. Remove the absorbent materials promptly and dispose of in the trash.



### Vehicle and equipment washing

- Take vehicles to a commercial car wash. These facilities collect and treat the wastewater.
- If you wash vehicles onsite, wash equipment and vehicles ONLY in designated facilities where the wash water drains to the sanitary sewer system or is collected and recycled.
- Clean parts in a self-contained unit. Make sure that the parts washer is not connected to the storm drain.
- Use steam cleaning and pressure washing instead of solvents.



### Vehicle parking and equipment storage

- Inspect parking and storage areas for leaks.
- Store vehicles and equipment inside or under cover to prevent precipitation from washing pollutants into the storm drain.
- Store vehicles on a paved area that you can steam sweep regularly to remove drips, leaks, and dirt.
- Drain all fluids from wrecked cars when they arrive to prevent any spills or leaks.



### Vehicle and equipment maintenance

- Keep accurate maintenance logs and up-to-date inventory of materials.
- Perform vehicle maintenance in covered, designated service bays where spills and leaks can be properly contained.
- Recycle spent fluids. Do not dump down the drain or in the trash.
- Avoid hosing down your work areas. Use rags for small spills, a damp mop for general cleanup, and dry absorbent for larger spills.



### Chemical management – preventing leaks and spills

- Fit oil and chemical storage containers with secondary containment structures to contain spilled materials.
- Store materials indoors. If you do have outdoor storage areas, keep them covered to prevent rain from contacting the material.
- Cover and/or contain, through erosion control practices, stockpiles of raw materials (e.g., ash, soil) to prevent polluted stormwater runoff.
- Inspect storage areas regularly for spills and leaks. Keep containers and other storage devices in good condition without leaky seams or corrosion.



### Chemical management – when a spill occurs

- If a spill occurs, notify the key spill response personnel. If the material is hazardous, contact the local fire department.
- Never wash a spill into the storm drain or leave it without cleaning it up. Contain spills and block the nearby storm drain.
- Clean up non-hazardous spills by using a rag, damp cloth, or absorbent materials.



**SEMCOG**

Funding provided in part by the Rouge River National Wet Weather Demonstration Program grant #0399143-06, and SEMCOG, the Southeast Michigan Council of Governments.

# Aggregate Storage Tips

Pollution prevention



Keep salt covered



Keep cold patch materials covered



Keep aggregate materials in bins



Avoid placing materials near storm drains



Keep material areas swept



Catch basin cleanings and street sweepings must be contained

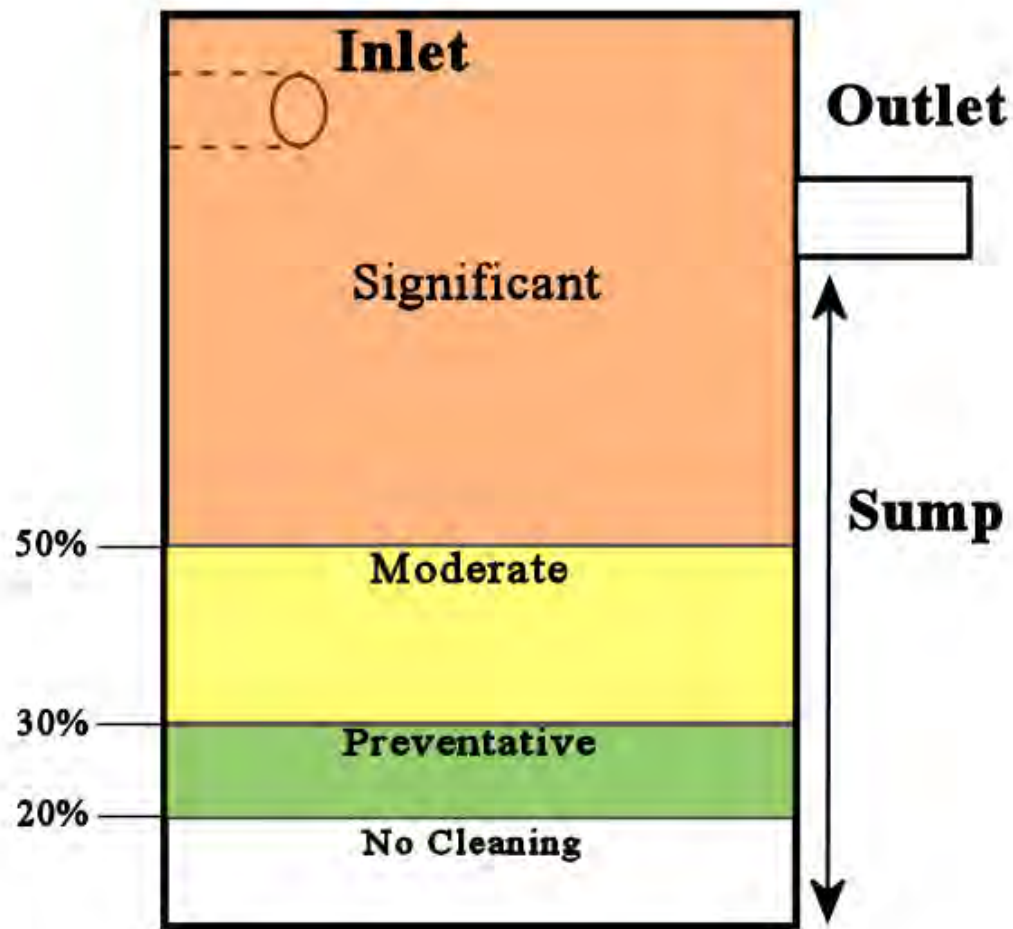


# Appendix E

## Inspection Field Worksheets







# Routine Storm Sewer System Inspection Table

<b>Building:</b>	"School/Location"
<b>Inspectors:</b>	"Inspectors Name"

<b>Client:</b>	"School District"	
<b>Start Date:</b>	"Start Date"	"End Date"
<b>Inspection Type:</b>	"Routine Storm Sewer Inspection or other"	

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





## Pond Inspection Form

<b>Building:</b> <input style="width: 90%;" type="text"/>	<b>Client:</b> <input style="width: 90%;" type="text"/>
<b>Inspectors:</b> <input style="width: 50%; height: 20px;" type="text"/> <input style="width: 50%; height: 20px;" type="text"/>	
<b>Date of Inspection:</b> <input style="width: 95%;" type="text"/>	

### Structure Information:

Structure ID: <input style="width: 95%;" type="text"/>	Number of Inlet(s) (OP): <input style="width: 95%;" type="text"/>
Pond Type: <input style="width: 95%;" type="text"/>	Number of Outlet(s) (DR): <input style="width: 95%;" type="text"/>
Age of Pond: <input style="width: 95%;" type="text"/>	Number of Stabilized Outlets (SO): <input style="width: 95%;" type="text"/>

### Inlet(s)/Outlet(s) (OP/DR) Observations:

Are there any structural issues with the inlet(s)/outlet(s) (OP/DR)? <input style="width: 95%;" type="text"/>	Structural Comments: <input style="width: 95%; height: 40px;" type="text"/>
Is there excess sediment buildup at the inlet(s)/outlet(s) (OP/DR)? <input style="width: 95%;" type="text"/>	Are the inlet(s)/outlet(s) (OP/DR) below the water level? <input style="width: 95%;" type="text"/>
Are the inlet(s)/outlet(s) (OP/DR) accessible or overgrown with vegetation? <input style="width: 95%;" type="text"/>	

### Pond Structure Observations:

Is there grass along the sides of the pond cut between 4" and 9"? <input style="width: 95%;" type="text"/>	Is there excess vegetation along the sides of the pond (not grass)? <input style="width: 95%;" type="text"/>
Are there signs of erosion along the side slopes, berms and/or emergency spillway? <input style="width: 95%;" type="text"/>	Is there evidence of animal burrows around the sidewalls of the pond? <input style="width: 95%;" type="text"/>

### Pond Vegetation Observations:

How much emergent vegetation is present in the pond bottom? <input style="width: 95%;" type="text"/>	Vegetation Comments: <input style="width: 95%; height: 30px;" type="text"/>
Is emergent vegetation made up of native or invasive species? <input style="width: 95%;" type="text"/>	Is there decomposing vegetation or organic matter decaying on the pond bottom? <input style="width: 95%;" type="text"/>

### General Pond Observations:

Is the pond free of trash/other debris? <input style="width: 95%;" type="text"/>	Types of trash/debris present: <input style="width: 95%;" type="text"/>
General Comments: <input style="width: 95%; height: 30px;" type="text"/>	

Pond Inspection Table Description

<b>ID #</b>	Enter structure ID
<b>Type</b>	Select from the following options: Retention Pond, Detention Pond, Retention Basin, Detention Basin
<b>Inspected</b>	Select Yes or No. If unable to inspect the structure, please make a comment under "General Comments" as to why you could not inspect the structure
<b>Approximate Age of the Pond</b>	This can be found using the history function in Google Earth for the site. Remember, this is an approximate age determination. We are interested in this information because pond life spans are between 15 and 20 years
<b>Number of Inlet(s) (OP)</b>	Select the number of inlet pipe(s) from the drop down menu
<b>Number of Outlet(s) (DR)</b>	Select the number of outlet pipe(s) from the drop down menu
<b>Number of Stabilized Outlet(s) (SO)</b>	Select the number of stabilized outlet(s) from the drop down menu
<b>Are there any structural issues with the inlet(s)/outlet(s) (OP/DR)?</b>	Examples include detached pipes, missing riprap around the inlet(s), missing stone around DR, etc. Select one of the following options: None, Preventative, Moderate, Significant, or Repaired. Preventative = beginning signs of deterioration Moderate = signs of deterioration present but does not hinder the function of the structure Significant = deterioration has hindered the function of the structure as it was designed
<b>Structural Comments</b>	Describe the structural issues observed
<b>Is there excess sediment buildup at the inlet(s)/outlet(s) (OP/DR)?</b>	Examples include pipes that are buried under sediment or sediment levels higher than the bottom of the inlet(s)/outlet(s)
<b>Are the inlet(s)/outlet(s) (OP/DR) below the water level?</b>	This could be a sign that the MS4 is backed up causing water to back up into the pond. If you suspect that, please investigate if that is the case. If the MS4 is not backed up, this could be a sign that the pond is not functioning as designed
<b>Are the inlet(s)/outlet(s) (OP/DR) accessible or overgrown with vegetation (native or invasive)?</b>	Overgrown vegetation at the inlet(s)/outlet(s) can prevent water from freely flowing in/out of the structure
<b>Is the grass along the sides of the pond cut between 4" and 9"?</b>	This is an ideal height range of grass around the pond to stabilize the sidewalls of the pond and to prevent erosion around the side walls of the pond
<b>Is there excess vegetation along the sidewalls of the pond (not grass)?</b>	Does the area look overgrown and unkempt? Select from the following options: Yes or No
<b>Are there signs of erosion along the side slopes, berms and/or emergency overflow?</b>	Select from the following options: Yes or no
<b>Is there evidence of animal burrows around the sidewalls of the pond?</b>	Select from the following options: Yes or No. Animal burrows can destabilize the sidewalls of the pond
<b>How much emergent vegetation is present in the pond bottom?</b>	Select from the following options: 0%-25%, 25%-50%, or 50%-100%. Use your best judgement to determine this percentage. Ideally, the pond bottom should be made up of around 25% emergent vegetation Emergent Vegetation Definition: Aquatic plants that grow with their roots under water but their leaves and stems above the surface of the water
<b>Is emergent vegetation made up of native or invasive species (phragmites or purple loosestrife)?</b>	See reference page in the Pond Inspection Reference page for photos of Phragmites and Purple Loosestrife to see if it is present.
<b>Vegetation Comments</b>	If there are invasive species present, please write which ones are present
<b>Is there vegetation or organic matter decaying on the pond bottom?</b>	Select from the following options: Yes, No, or Unknown. If you can tell, great, this could have impact on DO or could cause flow issues through the pond
<b>Is the pond free of trash/other debris?</b>	Select from the following options: Yes or No. This can include trash/inorganic debris or organic material (like grass clippings, leaves, etc.)
<b>Types of trash/debris present</b>	Select from the following options: Trash, Natural Debris (organic material) or N/A
<b>General Comments</b>	Please add any other comments that you feel are important to note about the pond condition





# Screening Inspection Log

<b>Building:</b>		<b>Client:</b>	
<b>Inspectors:</b>		<b>Date:</b>	
		<b>Inspection Type:</b>	

**Structure Information:**

ID Number:		Structure Type		Lat:		Long:	
Discharge Point/Outfall:		Location:					
Outfall Dimensions							

**Observations:**

**Standing Water Characteristics**

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

**Flow Characteristics**

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

**Maintenance**

Cleaning:	
Blockages	
Structural Issues	
Structural Trend	
Stenciling:	

**Additional Comments:**

**Sample ID And Information**

Sample Collected?	
Permit Cycle:	
Last Rain Event:	
Current Weather:	
Screening Location Type:	
Other Screening Activities Conducted:	
Outfall Characterization:	
Sample sent to Lab:	

**Field Analysis:**

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

**Equipment Calibration:**

Date:	Cal. By:
-------	----------



# TMDL Screening Inspection Log

<b>Building:</b>		<b>Client:</b>	
<b>Inspectors:</b>		<b>Date:</b>	
		<b>Inspection Type:</b>	

**Structure Information:**

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

**Observations:**

**Standing Water Characteristics**

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

**Flow Characteristics**

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

**Additional Comments:**

**Sample ID And Information**

Sample ID And Information	Lab Analysis:	Results:	TMDL Threshold:	Units:	Photo ID:
Sample ID:	pH:		6.5 - 9	pH units	
Time Collected:	Temperature:		N/A	Celsius	
Last Rain Event:	E. coli:		1000	CFU per 100mL	
Current Weather:	Total Phosphorus:		Watershed Dependent	ug/L	
Screening Location Type:	Total Suspended Solids:		Watershed Dependent	mg/L	
Total Rainfall (Inches):	Dissolved Oxygen:		Watershed Dependent	mg/L	
Outfall Characterization:	Other:				
Sample sent to Lab:					

# SOIL EROSION AND SEDIMENTATION CONTROL (SESC) INSPECTION REPORT

**DEPARTMENT OF MANAGEMENT AND BUDGET  
INFRASTRUCTURE SERVICES, DESIGN AND CONSTRUCTION DIVISION**

Second Floor, Stevens T. Mason Building  
P.O. Box 30026, Lansing, Michigan 48909

This report is required to document soil erosion and sedimentation control on State of Michigan projects. (Authority: Part 91, PA 451)

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

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

Weekly     Daily

B. CURRENT WEATHER CONDITIONS:

Sunny     Cloudy     Partly Cloudy     Windy                      Temperature \_\_\_\_\_

Precipitation:     Rain     Snow     Sleet     Hail                      Other (explain) \_\_\_\_\_

C. DESCRIBE SEVERE WEATHER (if applicable):

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

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

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

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



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

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

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

J. BY WHAT DATE MUST THESE ACTIONS BE IMPLEMENTED: \_\_\_\_\_

K. OBSERVATIONS / COMMENTS:

\_\_\_\_\_  
Signature of Inspector

\_\_\_\_\_  
Date

cc:





# Appendix F

## Property Structural Controls Inventory, Inspection, & Maintenance Schedule

## Rochester Community Schools – Adams High School/Van Hoosen Middle School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Adams High School &amp; Van Hoosen Middle School</b>  3200 W Tienken Rd, Rochester Hills, MI 48306	Medium	Catch Basin/Manholes	122	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	4	Inspect Annually, Maintain as Needed
		Basin Drain	3	Inspect Annually, Maintain as Needed
		Infiltration Basin	11	Inspect Annually, Maintain as Needed
		Detention Pond	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	1	Inspect Annually, Maintain as Needed
		Trench Drain	3	Inspect Annually, Maintain as Needed



## Rochester Community Schools – Baldwin Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Baldwin Elementary School</b>  4325 Bannister Road, Rochester, MI 48306	Low	Catch Basin/Manholes	8	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	5	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed

## Rochester Community Schools – Brewster Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Brewster Elementary School</b>  1535 Brewster Road, Rochester Hills, MI 48306	Low	Catch Basin/Manholes	18	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	6	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Basin Drain	1	Inspect Annually, Maintain as Needed
		Trench Drain	1	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Underground Detention System	2	Inspect Annually, Maintain as Needed



# Rochester Community Schools – Brooklands Elementary School/Race Adult Education Building

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Brooklands Elementary School/Race Adult Education Building</b>  490 E. Auburn Road, Rochester Hills, MI 48307	Low	Catch Basin/Manholes	22	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	4	Inspect Annually, Maintain as Needed
		Retention Pond	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed

# Rochester Community Schools – Caring Steps Children’s Center Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Caring Steps Children’s Center</b>  3838 Rochester Road, Rochester, Michigan 48306	Low	Catch Basin/Manholes	10	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	14	Inspect Annually, Maintain as Needed
		Drainage Receptor	4	Inspect Annually, Maintain as Needed
		Detention Pond	3	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed



## Rochester Community Schools – Delta Kelly Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Delta Kelly Elementary School</b>  3880 Adams Road, Oakland, MI 48363	Medium	Catch Basin/Manholes	43	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	6	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Detention Basin/Pond	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	6	Inspect Annually, Maintain as Needed
		Stream Bank	1	Inspect Annually, Maintain as Needed

# Rochester Community Schools – Facility Operations Center

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Facilities Operations Building</b>  1402 W. Hamlin Road, Rochester Hills, MI 48309	High	Catch Basin/Manholes	17	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Underground Detention System	2	Inspect Annually, Maintain as Needed
		Hydrodynamic Separator	3	Inspect Annually, Maintain as Needed
		Stream Bank	1	Inspect Annually, Maintain as Needed
		Oil Water Separator	2	Inspect Annually, Maintain as Needed
		Trench Drain	1	Inspect Annually, Maintain as Needed
		UST	1	Inspect as part of the UST program.
		AST	3	Inspect as part of the SWPPP 6 Month Comprehensive Inspection



# Rochester Community Schools – Facility Operations Center

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
Facilities Operations Building Continued	High	Bus Wash	1	Inspect as part of the SWPPP 6 Month Comprehensive Inspection
		Salt Storage	1	Inspect as part of the SWPPP 6 Month Comprehensive Inspection

## Rochester Community Schools – Hamlin Elementary School

### Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Hamlin Elementary School</b> 270 West Hamlin, Rochester Hills, MI 48307	Medium	Catch Basin/Manholes	25	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	3	Inspect Annually, Maintain as Needed
		Infiltration Basin	2	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Flow Splitter	1	Inspect Annually, Maintain as Needed
		Stream Bank	1	Inspect Annually, Maintain as Needed



# Rochester Community Schools – Hampton Elementary School

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<p><b>Hampton Elementary School</b></p> <p>530 Hampton Circle, Rochester Hills, MI 48307</p>	<p>Low</p>	<p>Catch Basin/Manholes</p>	<p>21</p>	<p>Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.</p>

## Rochester Community Schools – Hart Middle School

### Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Hart Middle School</b> 6500 Sheldon Road, Rochester Hills, MI 48306	Medium	Catch Basin/Manholes	56	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	10	Inspect Annually, Maintain as Needed
		Drainage Receptor	4	Inspect Annually, Maintain as Needed
		Detention Basin	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Stream Bank	1	Inspect Annually, Maintain as Needed



# Rochester Community Schools – Hugger Elementary School

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Hugger Elementary School</b> 5050 Sheldon Road, Rochester Hills, MI 48306	Low	Catch Basin/Manholes	32	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	15	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed

## Rochester Community Schools – John M. Schultz Education Center Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>John M. Schultz Education Center</b>  1440 John R Road, Rochester, MI 48307	Low	Catch Basin/Manholes	23	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Flow Splitter	2	Inspect Annually, Maintain as Needed
		Hydrodynamic Separator	2	Inspect Annually, Maintain as Needed



# Rochester Community Schools – Long Meadow Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Long Meadow Elementary School</b>  450 Allston Road, Rochester Hills, MI 48309	Low	Catch Basin/Manholes	31	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Flow Splitter	1	Inspect Annually, Maintain as Needed
		Trench Drain	2	Inspect Annually, Maintain as Needed

# Rochester Community Schools – McGregor Elementary School

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>McGregor Elementary School</b> 1101 First Street, Rochester, MI 48307	Low	Catch Basin/Manholes	27	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	7	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	3	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed



## Rochester Community Schools – Meadow Brook Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Meadow Brook Elementary School</b>  2350 Munster Road, Rochester Hills, MI 48309	Low	Catch Basin/Manholes	30	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Underground Detention System	2	Inspect Annually, Maintain as Needed

## Rochester Community Schools – Musson Elementary School

### Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Musson Elementary School</b>  3500 Dutton Road, Rochester Hills, MI 48306	Low	Catch Basin/Manholes	22	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	4	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	1	Inspect Annually, Maintain as Needed
		Detention Pond	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	1	Inspect Annually, Maintain as Needed



# Rochester Community Schools – New Administration Building Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>New Administration Building</b>  52585 Dequindre Rd., Rochester, MI 48307	Low	Catch Basin/Manholes	22	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed

## Rochester Community Schools – North Hill Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>North Hill Elementary School</b>  1385 Mahaffy Avenue, Rochester, MI 48307	Low	Catch Basin/Manholes	32	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	4	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Detention Basin	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	2	Inspect Annually, Maintain as Needed
		Trench Drain	1	Inspect Annually, Maintain as Needed



# Rochester Community Schools – Old Administration Building

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Old Administration Building</b>  501 University Drive, Rochester, MI 48307	Low	Catch Basin/Manholes	15	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Trench Drain	1	Inspect Annually, Maintain as Needed

# Rochester Community Schools – Reuther Middle School

## Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Reuther Middle School</b>  1430 E. Auburn Road, Rochester Hills, MI 48307	Low	Catch Basin/Manholes	35	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	8	Inspect Annually, Maintain as Needed
		Detention Basin	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	2	Inspect Annually, Maintain as Needed



## Rochester Community Schools – Rochester High School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<p><b>Rochester High School</b> 1361 Walton Boulevard, Rochester Hills, MI 48309</p> <p>The Transportation Building has a separate inventory. Please see the Transportation Building Structural Control Inventory, Inspection, &amp; Maintenance Schedule for reference.</p>	Medium	Catch Basin/Manholes	88	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	2	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Detention Basin	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	6	Inspect Annually, Maintain as Needed
		Stabilized Outlet	1	Inspect Annually, Maintain as Needed
		Trench Drain	2	Inspect Annually, Maintain as Needed

## Rochester Community Schools – Stoney Creek High School

### Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>Stoney Creek High School</b> 575 E. Tienken, Rochester Hills, MI 48306	Medium	Catch Basin/Manholes	90	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	8	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Infiltration Basin	3	Inspect Annually, Maintain as Needed
		Detention Basin/Pond	2	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed
		Basin Drain	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	3	Inspect Annually, Maintain as Needed
		Stream Bank	2	Inspect Annually, Maintain as Needed



## Rochester Community Schools – Transportation Building Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<p><b>Transportation Building</b> 380 S. Livernois Rd, Rochester Hills, MI 48309</p> <p>The Transportation Building is included under the Rochester High School/Transportation Complex but has been separated for this inventory.</p>	High	Catch Basin/Manholes	27	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Underground Detention System	2	Inspect Annually, Maintain as Needed
		Hydrodynamic Separator	1	Inspect Annually, Maintain as Needed

## Rochester Community Schools – University Hills Elementary School Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>University Hills Elementary School</b>  600 Croydon Road, Rochester Hills, Rochester Hills, MI 48309	Low	Catch Basin/Manholes	17	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	3	Inspect Annually, Maintain as Needed
		Drainage Receptor	2	Inspect Annually, Maintain as Needed
		Underground Detention System	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	2	Inspect Annually, Maintain as Needed



## Rochester Community Schools – West Middle School

### Structural Control Inventory, Inspection, & Maintenance Schedule

Facility	Priority Level of Potential Discharge (High, Medium, Low)	Type of Structural Control	Number of Controls	Inspection/Maintenance Schedule
<b>West Middle School</b> 500 Old Perch, Rochester Hills, MI 48309	Low	Catch Basin/Manholes	39	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is Between 30 and 50% of the Total Sump Depth.
		Open Pipe Outlet	4	Inspect Annually, Maintain as Needed
		Drainage Receptor	1	Inspect Annually, Maintain as Needed
		Infiltration Basin	3	Inspect Annually, Maintain as Needed
		Detention Pond	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channel	1	Inspect Annually, Maintain as Needed
		Lift Station	1	Inspect Annually, Maintain as Needed
		Stabilized Outlet	2	Inspect Annually, Maintain as Needed
		Trench Drain	1	Inspect Annually, Maintain as Needed

# Appendix G

## Contractor Oversight & Employee Training Documentation





## Rochester Community Schools STORMWATER CONTRACTOR OVERSIGHT RECORD

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

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

Please initial each line of the procedure.

\_\_\_\_\_ Prevent and respond to leaks, spills and other releases;

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

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

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

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

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

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

\_\_\_\_\_ Report any other discharge from the potential pollutant-generating activities not addressed above to Rochester Community Schools.

\_\_\_\_\_  
Name of Business

\_\_\_\_\_  
Business Representative

\_\_\_\_\_  
Date



# Appendix H

## TMDL Sample Location Table

## TMDL Sample Locations

Rochester Community Schools				
Facility	Point of Discharge	Receiving Waters	Watershed	Parameter
Adams High School / Van Hoosen Middle School COMPLEX	RAV-65.CB.DP	Paint Creek	Clinton River	E. coli
Baldwin Elementary School	BDN-04.CB.DP	Paint Creek	Clinton River	E. coli
Brewster Elementary School	BRW-02.DR.DP	Paint Creek	Clinton River	E. coli
Brooklands Elementary School / RACE Education Center	BLK-18.MH.DP	Gibson Drain-Plum Brook	Clinton River	E. coli
Caring Steps Children's Center	CSC-08.OP.OF	West Branch of Stoney Creek	Clinton River	E. coli
Delta Kelly Elementary School	DLK-16.OP.OF	Unnamed Tributary of Paint Creek	Clinton River	E. coli
Facility Operations Center	FOC-23.OP.OF	Galloway Creek	Clinton River	E. coli
Hamlin Elementary School	HML-09.OP.OF	Gibson Drain-Plum Brook	Clinton River	E. coli
Hampton Elementary School	HPT-13.MH.DP	Gibson Drain-Plum Brook	Clinton River	E. coli
Hart Middle School	HRT-21.OP.OF	Unnamed Tributary of Stoney Creek	Clinton River	E. coli
	HRT-52.OP.OF	Unnamed Tributary of Stoney Creek	Clinton River	E. coli
	HRT-56.OP.OF	Unnamed Tributary of Stoney Creek	Clinton River	E. coli
Hugger Elementary School	None	N/A	N/A	N/A
John M. Schultz Educational Center (Formerly ACE High School)	ACE-27.MH.DP	Cranberry Marsh Drain	Clinton River	E. coli
Long Meadow Elementary School	LMW-01.OP.OF	Paint Creek	Clinton River	E. coli
	LMW-16.MH.DP	Paint Creek	Clinton River	E. coli
McGregor Elementary School	MCG-10.CB.DP	Galloway Creek	Clinton River	E. coli
Meadow Brook Elementary School	MBE-05.MH.DP	Galloway Creek	Clinton River	E. coli
Musson Elementary School	MSN-13.OP.DP	Paint Creek	Clinton River	E. coli
New Administration Building	NAB-24.OP.OF	Cranberry Marsh Drain	Clinton River	E. coli
North Hill Elementary School	NHE-07.MH.DP	Paint Creek	Clinton River	E. coli



## TMDL Sample Locations

Rochester Community Schools				
Facility	Point of Discharge	Receiving Waters	Watershed	Parameter
Old Administration Building	RAB-12.MH.DP	Paint Creek	Clinton River	E. coli
Reuther Middle School	RTR-22.MH.DP	Gibson Drain-Plum Brook	Clinton River	E. coli
Rochester High School/Transportation Facility COMPLEX	RHS-10.CB.DP	Galloway Creek	Clinton River	E. coli
	RHS-14.MH.DP	Galloway Creek	Clinton River	E. coli
	RHS-63.MH.DP	Paint Creek	Clinton River	E. coli
	RHS-70.SO.DP	Paint Creek	Clinton River	E. coli
	RHS-133.MH.DP	Galloway Creek	Clinton River	E. coli
Stoney Creek High School	SCR-02.OP.OF	Unnamed Tributary of Stoney Creek	Clinton River	E. coli
	SCR-24.OP.OF	Unnamed Tributary of Stoney Creek	Clinton River	E. coli
University Hills Elementary School	UVL-02.MH.DP	Galloway Creek	Clinton River	E. coli
West Middle School	WET-13.SO.DP	Galloway Creek	Clinton River	E. coli