Huron School District
Stormwater Management Program Plan

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

PERMIT NO. PENDING

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Stormwater Management Program Plan

1.0 Introduction

Huron School District is a public school district based in Huron, 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. Huron School District 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 required under the MS4 NPDES Permit. Measurable goals describe the actions Huron School District will take to implement each BMP and allow Huron School District to evaluate progress toward meeting key objectives outlined in the following sections.

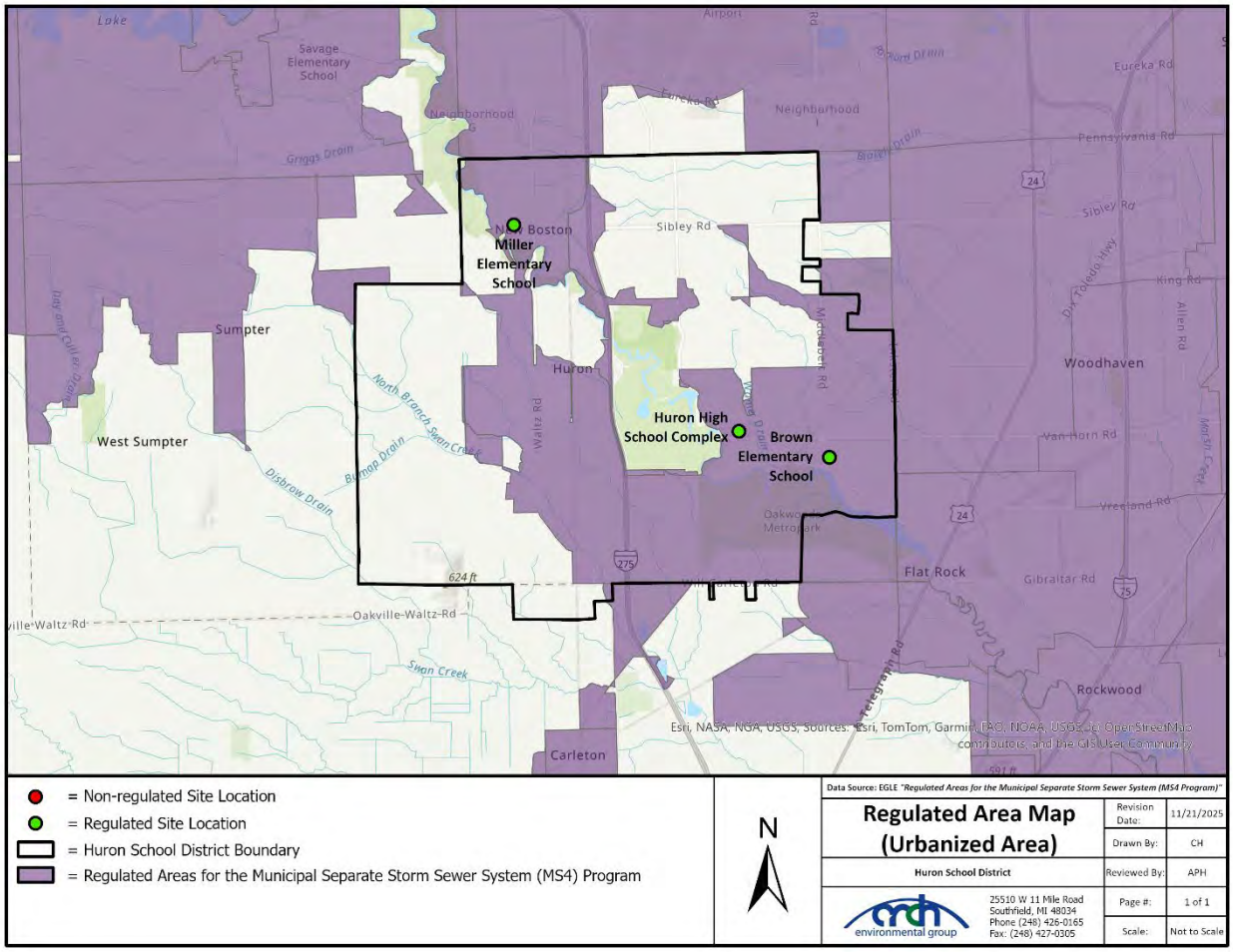
Huron School District owns and operates three (3) public properties within the boundaries of the Huron Township Urbanized Area, a regulated area for the Municipal Separate Storm Sewer System (MS4) Program. All Huron School District properties are within the urbanized area based off of the 2020 Census data, and the facilities include:

1. **Brown Elementary School,** 25485 Middlebelt Road, New Boston, MI 48164
2. **Huron High School** (32044 Huron River Drive, New Boston, MI 48164) / **Renton Junior High School** (31578 Huron River Drive, New Boston, MI 48164) / **Ferguson Early Childhood Center** (24678 Merriman Road, New Boston, MI 48164) / **Sunnyside Kindergarten Center** / **Transportation Facility** (24820 Merriman Road, New Boston, MI 48164) **COMPLEX**
3. **Miller Elementary School,** 18955 Hannon Road, New Boston, MI 48164

1.1 Regulated Area

A map identifying Huron School District within the Huron Township Urbanized Area as defined by the 2020 Census is provided below in Map 1.

Map 1 – District Jurisdictional Boundary Map – Urbanized Area[1]



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.

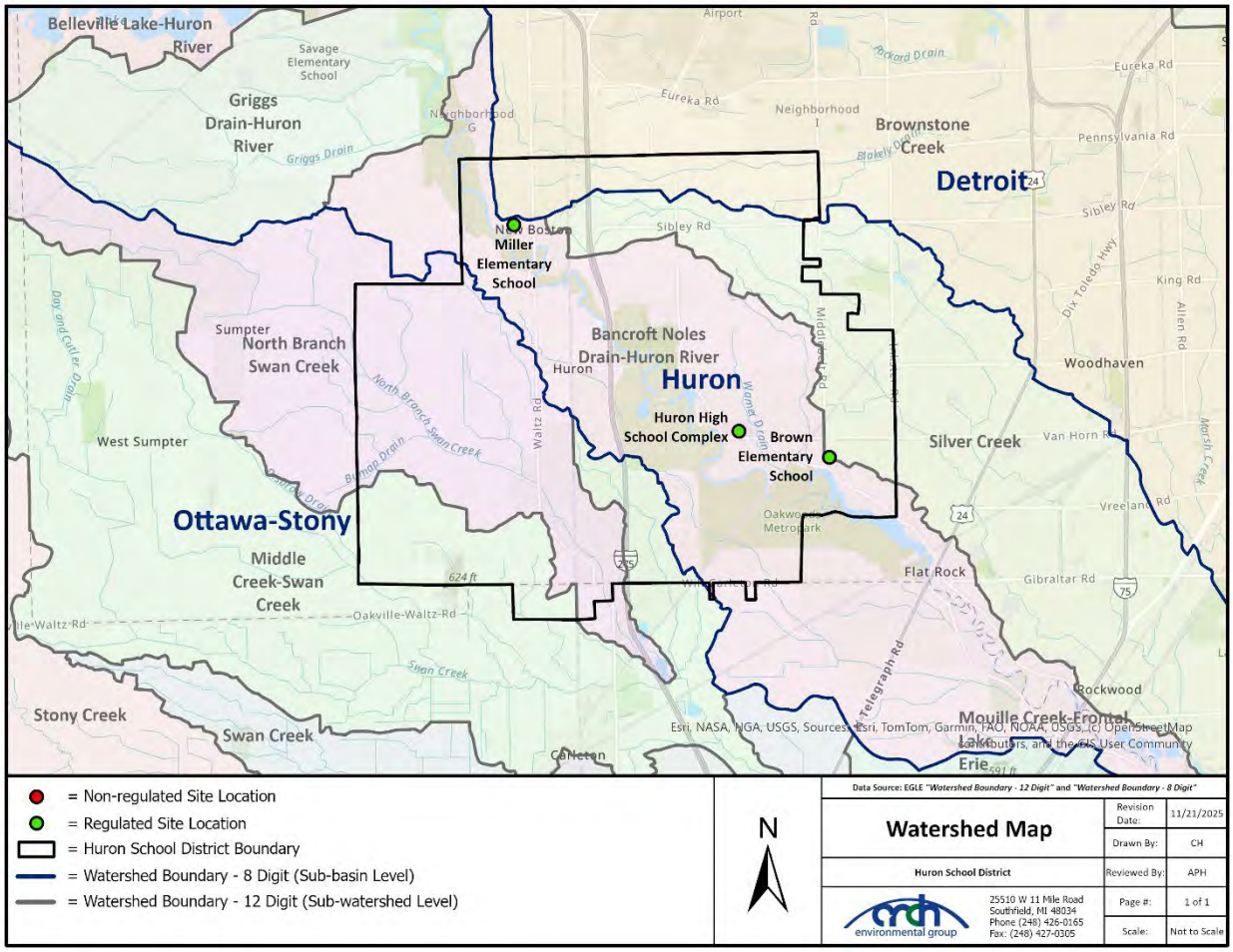
Huron School District has identified outfalls that discharge directly into surface waters of the state and discharge points that discharge into other MS4 drainage systems. The Huron School District drainage system discharges directly or indirectly into the Huron River Watershed as detailed in Map 2 below.

Huron School District 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-

[1] Urbanized area boundary based on Michigan Department of Environment, Great Lakes, and Energy *Regulated Areas for the Municipal Separate Storm Sewer System (MS4 Program)*.

specific storm sewer system maps are provided in Appendix A. Any changes to the Huron School District storm sewer system will be reflected on the storm sewer system maps and reported provided to the EGLE during progress reporting. The district watershed boundary map is provided below in the map listed as "Map 2".

Map 2 – District Watershed Map[2]



1.3 Enforcement Response Procedures

The Huron School District properties are regulated as an MS4 under the NPDES Permit program. Environmental compliance staff members from Huron School District have the authority to inspect and monitor stormwater-related activities on campus and require full compliance with all stormwater permit requirements. Enforcement of Huron School District 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.

[2] Watershed boundaries based on Michigan Department of Environment, Great Lakes, and Energy *Watershed Boundary - 12 Digit* and *Watershed Boundary - 8 Digit*.

The primary role of the Stormwater Program Manager 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) Huron School District 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 the public to comment on the SWMP.
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 Huron School District stormwater webpage to target public education materials for consumption that are relevant to Huron School District's public.

5. A link to a stormwater blog "Cleanwater Chronicles" has been added to the Huron School District stormwater webpage. The stormwater blog explains water quality issues and promotes opportunities for public involvement.
6. Engagement in environmental education activities, including cooperation with local watershed protection groups.

2.1.3 Public Involvement & Participation Assessment

1. Huron School District 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

BMP	Implementation of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.1.4.1 Public Notice of SWMP	Make SWMP available for public review through stormwater webpage.	Annually Throughout Permit Cycle	Public Notice of SWMP published in a newsletter, posted prominently on the district's website, or published within district facilities announcing the availability of the SWMP for public review and comment.	Verify the SWMP is available on the stormwater webpage and verify annually during webpage reviews that the most recent copy of the SWMP is available for review and comment.	Huron School District
	Notification in annual district newsletter, posted prominently on the district's website once per fiscal year, or posting in district facilities to publicize the SWMP and how to submit comments.			Keep copies of official SWMP posting notifications.	
	Contact information will be available on the stormwater webpages for how to submit comments regarding the SWMP.			Compile and track comments from the public.	
BMP #2.1.4.2 Stormwater Blog	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.	Huron School District
BMP #2.1.4.3 Stormwater Education Program Survey	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.	Huron School District

BMP	Implementation of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.1.4.4 Participation Activities	Engage in environmental education activities.	Ongoing Throughout Permit Cycle	Increase in public participation in environmental activities and outreach events. Participation activities include water quality issues, stormwater management initiatives, home toxics, recycling, compost, and disposal.	Reports of participation.	Huron School District
BMP #2.1.4.5 Public Involvement & Participation Program Assessment	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.	Huron School District

2.2 Public Education Program (PEP)

Huron School District's "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 Huron School District separate storm sewer system.

The term "Public" as referred to in this plan is defined to include all persons who could potentially affect the quality of stormwater discharges from Huron School District properties including but not limited to Huron School District faculty, staff, contractors, and students of Huron School District, as well as area residents, visitors, public employees, local businesses, industries, construction contractors and property developers. This program will include a variety of mechanisms and venues to provide watershed awareness and pollution prevention education throughout the Huron School District jurisdiction.

2.2.1 Public Education Program Objectives

1. Promote responsibility and stewardship in the District's watershed.
2. 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.
3. Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.
4. Promote preferred cleaning materials and procedures for cars, pavement, and power washing.
5. Inform and educate the public on the proper application and disposal of deicing materials, pesticides, herbicides, and fertilizers.
6. Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter the MS4.
7. 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.
8. Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.

2.2.2 Public Education Program Procedure

Huron School District is not prioritizing implementation of BMPs and will provide education on all PEP topics listed in section 2.2.1. It is anticipated that during this permit a combination of approaches will be used to convey the educational materials of the program. Delivery mechanisms may include tracking of water cycle and/or water quality specific education topics in various science curriculums, distribution and/or posting of watershed partner literature, and event notices for community participation in watershed stewardship. Huron School District has developed and implemented a comprehensive "Stormwater Management" webpage on the district's website to provide specific resources of public education to the public. Additionally, program posters are strategically placed throughout school facilities. Copies of those postings are provided in Appendix C.

2.2.3 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 one form of evaluation of the program effectiveness. 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 Huron School District in

identifying opportunities for enhancement of the Public Education Program. Additionally, Huron School District will conduct an annual review of the public education program's best management practices to determine if they have been implemented as outlined in section 2.2.4 and identify areas of improvement.

2.2.4 Public Education Program (PEP) – BMP Table

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.1 Promote public responsibility and stewardship in watershed.	Watershed specific website hosted by district, featuring watershed maps, description of watershed, and links to watershed groups.	Ongoing Throughout Permit Cycle	Supply watershed information and promote watershed membership information. Educate the public on local water body health.	Update webpages as necessary. Confirm posting & track webpage reviews. Provide watershed membership information.	Students, faculty, and community	Huron School District
	Place SEMCOG "7 Simple Steps to Clean Water" information on stormwater webpages.		SEMCOG "7 Simple Steps to Clean Water" information and links.	Update webpages as necessary. Confirm posting & track webpage reviews.		
	Publicize environmental related events from local watershed groups through email, newsletters, or social media.		Promote public awareness of environmental issues and increase district environmental participation through watershed group sponsored events.	Date, time, location, and name of event attended.	Students, faculty and community	
				Maintain copies of email notices (watershed announcement) of educational materials provided to district staff.		

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.2 Educate the public about the connection of the MS4 to the area waterbodies and the potential impacts discharges could have on surface waters of the state.	Posting of the training video "When it Rains, it Drains…The Stormwater Question" on the district webpage.	Ongoing Throughout Permit Cycle	Educate the public on local water bodies, water quality issues, and impacts of discharges on surface waters through visual media.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Huron School District
	Include information and links to USEPA and EGLE Stormwater information on district stormwater webpage.		Provide resources to water quality issues and impacts of discharges on surface waters.	Update webpages as necessary. Confirm posting of links & track webpage reviews.		
	SEMCOG posters placed strategically throughout the district.		Maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Document number of posters placed throughout district.		
	General Stormwater Awareness Training		Encourage teachers, administrative and support staff to watch the General Awareness Stormwater Video "When it Rains it Drains".	Copies of training logs.	Faculty	
			Post stormwater training video on stormwater webpage.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.3 Educate the Public on Illicit Discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.	Publicize 24-hour environmental hot-line phone numbers and instructions for reporting spills, illicit discharges, or connections.	Ongoing Throughout Permit Cycle	Track # of calls received on hotline per year. All calls to be addressed and record outcome of calls. Goal of an overall decrease in number of illicit discharges in improper disposal of materials into MS4s.	Number of calls to the Stormwater Manager.	Students, faculty, and community	Huron School District
			Place 24-hour environmental hot-line posters throughout the district.	Promotion/ publicizing efforts; number of posters placed throughout district.		
	Feature information on the Pollutants & Illicit Discharges webpage regarding sources of pollution, illicit discharges, and how pollutants cause damage to the environment.		Maintain Pollutants & Illicit Discharges webpage.	Update webpages as necessary. Confirm posting & track webpage reviews.		
	Education material describing how to identify and report illicit discharges.		Place "How to spot illicit discharge/ How to Report-Hotline Numbers" posters at each district facility. The goal is to have one poster at each facility.	Annual review of postings. Number of posters placed throughout district.		
	SEMCOG posters placed strategically throughout the district.		Goal to maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Number of posters placed throughout district.		
	The district implements an active storm drain labeling/ marking program.	Update as needed Throughout Permit Cycle	Visually making a connection of storm drains to local waterways and the impacts of dumping pollutants into these drains increase number of staff, students and visitors who can identify the connection. Mark all drains on impervious surfaces.	Annual inventory of stenciled basins.		

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.4 Promote preferred cleaning materials and procedures for car, pavement, and power washing.	SEMCOG posters placed strategically throughout the district.	Ongoing Throughout Permit Cycle	Goal to maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Number of posters placed throughout district.	Students, faculty, and community	Huron School District
	Discontinue practice of allowing school or other private groups from holding car wash fund raising project on school property.	Annually Throughout Permit Cycle	Send a reminder email notice to all school Principals and Athletic Directors regarding the policy.	Copy of annual car wash prohibited notice distributed to district staff.	Faculty & students	
BMP #2.2.4.5 Inform and educate the public on proper application and disposal of deicing materials, pesticides, herbicides, and fertilizers.	Maintain a district SEMCOG "Seven Simple Steps" informational page on stormwater management webpages.	Ongoing Throughout Permit Cycle	Address the environmental (including water quality) and resulting from improper handling and disposal of deicing materials, pesticides, herbicides, and fertilizers.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Huron School District
	SEMCOG posters placed strategically throughout the district.		Goal to maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Number of posters placed throughout district.		

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.6 Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.	SEMCOG posters placed strategically throughout the district.	Ongoing Throughout Permit Cycle	Goal to maintain three (3) various SEMCOG posters at each facility. Strategic locations include Main Office, Lounge, and Receiving Area (if available).	Annual review of postings. Number of posters placed throughout district.	Students, faculty, and community	Huron School District
BMP #2.2.4.7 Identify and promote the availability, location, and requirements of facilities for collection and disposal of household hazardous wastes, travel trailer wastes, chemicals, and motor vehicle fluids.	Maintain a district "Household Hazardous Waste" informational page on stormwater management webpages.	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	Huron School District
BMP #2.2.4.8 Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.	Maintain a district "Sewer Overflows and Septic Systems" informational page on stormwater management webpages.	Ongoing Throughout Permit Cycle	Educate why sewer overflows and septic systems are pollution issues. Promote proper and consistent maintenance of septic systems.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Huron School District

BMP Topic	Description of BMP	Timeframe	Measurable Goal & Key Messages	Measure of Assessment	Target Audience	Responsible Party
BMP #2.2.4.9 Promote methods for managing riparian lands to protect water quality.	Maintain a district "Riparian Zone Management" informational page on stormwater management webpages.	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	Huron School District
	Encourage teachers and students to participate in stream bank monitoring programs.	Ongoing Throughout Permit Cycle	Increase awareness, inspire people to take actions that lead to better river protection at home and in their communities.	Report on schools that participated in monitoring programs.	Students and faculty	
	Include guidance and links on Stormwater webpage on native vegetation.	Ongoing Throughout Permit Cycle	Maintain a district "Native, Non-Native, & Invasive Species" and "Why Use Native Plants?" informational page on stormwater management webpages. Increase the use of native plants and encourage the use of gardens at school facilities.	Update webpages as necessary. Confirm posting & track webpage reviews.	Students, faculty, and community	Huron School District
BMP #2.2.4.10 Stormwater Education Program Effectiveness Survey	Post survey on district website	Annually Throughout Permit Cycle	A survey has been posted on the stormwater webpages and will be posted throughout the permit term to ascertain behavioral changes.	Annual results of survey.	Students, faculty, and community	Huron School District
BMP #2.2.4.11 Public Education Program Effectiveness Assessment	Summary of annual public education activities for the "Public Education" component to evaluate the effectiveness.	Annually Throughout Permit Cycle	Determine if the public education best management practices have been implemented and identify areas of improvement.	Annual SWMP review. Summary of public education activities. Survey results review.	Students, faculty, and community	Huron School District

2.3 Illicit Discharge Elimination Program (IDEP)

The following Huron School District 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

Huron School District 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 as needed for reporting 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 may 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 may include on-site catch basins, trench drains, and conveyances to roadside ditches.

Copies of the current facility storm sewer system maps are available at Huron High School, 32044 Huron River Drive, New Boston, MI 48164. 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

Huron School District will conduct field observations for 100% of all outfalls and points of discharge locations during dry weather or more expeditiously if Huron School District 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 (DWS) will be conducted by Huron School District once per permit cycle, which is typically a five-year period. . Outfalls and points of discharge will be inspected and evaluated following a period of at least 48-72 hours of dry weather to adequately characterize dry-weather conditions.

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 potential discharges 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.

Dry Weather Screening field observations will document the following items,

- Outfall or point of discharge identification number
- Date of inspection and name of inspector(s) completing the screening
- Number of hours since last significant rainfall
- Structural condition of outfall or point of discharge
- 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.*

During field observations, in instances where the storm sewer outfalls and points of discharge are submerged or are connected to another enclosed sewer, the inspector will observe the nearest upstream storm sewer location or access point. All field observations are detailed on a *"*Screening Inspection Log*".* A copy of the Screening Inspection Log is provided in Appendix D.

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 will include 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 field screening is a secondary tool utilized to help determine the source of dry weather flow when there are no obvious indicators such as very high turbidity, strong odors, or visible discharge. The determination of which field screening parameters to use to determine dry weather flow may be determined based on the site conditions, visual observations, and olfactory observations.

Additional grab samples may be collected and delivered for external laboratory analysis, if additional test parameters are needed for the source investigation. The laboratory analysis parameters for grab samples will be determined based on the suspected source of the flow during the source investigation.

Field screening and laboratory analysis parameters may include the following with the associated action level[3]:

- **pH** (Action Level: <6.5 or >9.0)
- **E. coli** (Action Level: >1,000 CFU)
- **Surfactants** (Action Level: >0.5 mg/l)
- **Ammonia** (Action Level: >1.0 mg/l)

Once the source has been isolated down to a specific site location through field investigation, field screening, and/or laboratory analysis, the work for source confirmation will begin. Additional fieldwork, building evaluation, and/or dye testing may be necessary to confirm the source of the flow. Continued source investigations will be conducted, if needed, within 14 days of the original observed dry weather flow.

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. Huron School District 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).

Huron School District will evaluate and conduct the following actions regarding reported or observed illicit discharges/illegal dumping into the storm drainage system:

- Suspected discharges will be investigated within 24 hours. Huron School District 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.

[3] Action levels were determined based on the EGLE Municipal Separate Storm Sewer System (MS4) Program – Dry-Weather Screening: A Guide for Permittees

  - Huron School District will follow existing spill response procedures outlined in Section 2.3.9, under Spill Response, Policy & Procedures, if required.
- If the party responsible is identified, educate the party on the impact 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.
- Huron School District 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 or illicit connection has been confirmed from a Huron School District facility, the discharge will be corrected using the most expedient method possible based on the type of discharge or the configuration of the connection. Corrective actions implemented to eliminate the continued illicit discharge may include the cleaning of impacted areas/structures and the use of physical barriers as well as administrative measures. Those administrative measures may include employee training, placement of signs or markings, or policy revisions. Within 60 days of a confirmed illicit connection from a district facility, Huron School District will take steps to eliminate the illicit connection. 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 has developed a "Stormwater Management – Illicit Discharge Regulatory Policy". This policy was developed as a regulatory mechanism for prevention of pollution from storm water runoff and to protect the quality of the surface waters of the State of Michigan through the regulation of non-stormwater discharges to the 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 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 from District facilities of polluting substances into the MS4.
3. To establish authority to investigate, inspect, and monitor suspected illicit discharges or connections.
    a. The Stormwater Program Manager or designee will have the authority to investigate, inspect and monitor district facilities and properties for suspected or confirmed illicit discharges or connections to the MS4

Huron School District has a board policy resolution to direct compliance with these requirements. Huron School District Board Resolution was reviewed and passed in November 2025. A copy of the signed School Board Resolution and a copy of the "Stormwater Management – Illicit Discharge Regulatory Policy" are provided in Appendix B.

Prohibitions of Illicit Discharges

1. Prohibition of Illicit Discharges:

a. Huron School District 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 Huron School District 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.
        - Water 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.)

Prohibition of Illicit Connections

1. Improper connections in violation of this regulatory mechanism must be disconnected and redirected.
2. The construction, use, maintenance, or continued existence of illicit connections to the storm drain system is prohibited by Huron School District. 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

Huron School District is required to track the implementation of the illicit discharge elimination program per the SWMP and evaluate its effectiveness. The following are examples of the types of performance 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:

- Verify the distribution of public education posters.
- Evaluate dry weather screening monitoring date to measure changes in water quality.
- Number of illicit connections found, and the number of illicit connections eliminated.

- Evaluate the number and type of discharges that are investigated and determine if discharges have decreased throughout the permit cycle
- Evaluate if the number of reported potential discharges has increased due to improved awareness.
- Actions conducted to follow-up illicit discharges that are identified or reported.

2.3.9 Polluting Materials Emergency and Spill Response Procedures

Purpose

This procedure has been developed to define appropriate and safe response procedures for spill or accidental releases of hazardous materials or substances at all Huron School District's facilities.

Procedure

Only trained and authorized personnel are permitted to respond to hazardous materials incidents. 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 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 (including 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 procedure 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 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 socks, 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 (734) 782-2441.

2. Major Spill or Leak

- Call the Stormwater Program Manager immediately at (734) 782-2441.
- 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 and corrective measures to implement.

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 people who have received sufficient training and are competent in the handling of the released material.

2.3.10 Illicit Discharge Elimination Program (IDEP) – BMP Table

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.10.1 Facility Storm Sewer System Maps	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 2025 Updates Ongoing as Needed throughout Permit Cycle Within 30 days of new outfalls, discharge points, structures, and conveyances.	100% of facilities mapped, and 100% of storm sewer system updates mapped.	Maintain facility site maps at Huron High School, 32044 Huron River Drive, New Boston, MI 48164.	Huron School District
				Update facility map with sewer system updates. Maintain maps for progress report submittal.	Huron School District
BMP#2.3.10.2 Enforcement	Written policy to enforce elimination of illicit discharges into MS4 owned by the Permittee.	Illicit Discharge Regulatory Policy Developed and Board Resolution Passed in November 2025.	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	Huron School District
				Copy of policy available on the district stormwater webpage or emailed to staff.	
BMP #2.3.10.3 Dry Weather Screening	Dry Weather Screening is 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 were inspected and evaluated following a period of 48-72 hours of dry weather.	Maintain dry weather screening inspection logs/reports.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.10.4 Illicit Discharge Reporting	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 in Receiving Rooms at each Huron School District facility. Goal is to have one poster at each facility.	Annually verify number of posters in place throughout the district.	Huron School District
			Advertise reporting hotline on district webpage.	Track number of calls and document calls.	
BMP #2.3.10.5 Unauthorized Discharge/ Illicit Discharge Complaint Response	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. Huron School District 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.	Huron School District
		Within 14 days of reported suspected discharge.			
BMP #2.3.10.6 Illicit Connections	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.	Huron School District
BMP #2.3.10.7 Illicit Discharge Elimination Training	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 1st 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 Huron School District. **[All Stormwater Training is outlined in Section 3.0 Training]**	Copy of sign in sheets.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.3.10.8 Notice of Intent to Discharge Tracer Dyes	Maintain approval from EGLE for authorization to discharge tracer dyes in surface waters per Rule 97 of the Michigan Water Quality Standards to conduct source investigations.	As needed Throughout Permit Cycle	EGLE approval to discharge tracer dyes.	Documentation of EGLE approval.	Huron School District
BMP #2.3.10.9 IDEP program Performance & Effectiveness	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, and the number and type of violations investigated.	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.	Huron School District

2.4 Construction Site Stormwater Runoff Control Program

Huron School District's goal is to establish procedures for construction stormwater runoff control to meet minimum measure requirements to the 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. Outline the process for notifying the Part 91 Agency appropriate staff when soil or sediment is discharged to the MS4 from a construction activity, if required.
    - 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. Outline the procedure for when to notify the EGLE when soil, sediment, or other pollutants are discharged to the MS4.
    - Other pollutants may include pesticides, petroleum derivatives, construction chemicals, and solid wastes that may become mobilized when land surfaces are disturbed.
C. The procedure for ensuring that construction activity that is one (1) acre or greater in total land disturbance obtains a Part 91 Permit from the appropriate Part 91 Agency.

2.4.2 Construction Notification Procedure

The EGLE certified construction stormwater operator 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 for deficiencies and report to the Huron School District Stormwater Manager (or designee) for correction.
2. The Huron School District Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency, if required.
3. Huron School District will notify the local Part 91 agency and/or EGLE, if required, 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:

Huron School District 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).

2.4.3 Part 91 Permit

Huron School District will ensure that any construction activity that results in a land disturbance that meets specific criteria will obtain a Part 91 Permit through the site plan review process with the appropriate county or municipal permitting agency. A Part 91 Permit is required if the project meets 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 which is greater than or equal to one (1) acre, or
- within 500 feet of a lake or stream.

2.4.4 Permit-by Rule Compliance

Huron School District shall comply with the State of Michigan Permit by Rule (Rule 323.2190) for stormwater discharge from construction activity. Construction activities that disturb one (1) acre, or more of land with a point source discharge to the water of the waters of the state are required to obtain an NPDES permit from the EGLE Water Resources Division (WRD). Permit-by Rule is the process in which storm water coverage is automatically issued for required construction activities upon securing a SESC permit from the appropriate Part 91 recognized County Enforcing Agency (CEA), Municipal Enforcing Agency (MEA), 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 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, which 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
BMP #2.4.5.1 Notification of Deposit during Inspection	Huron School District 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 Huron School District Stormwater Manager (or designee) is responsible for assessing any suspected or confirmed discharge and notifying the appropriate agency, if required. (Refer to section 2.4.2)	As necessary Throughout Permit Cycle	100% discharges identified and appropriate agencies notified. Control of potential system failure.	Documentation of Construction Stormwater Operator site inspection.	Huron School District
	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.			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]).	Huron School District
BMP #2.4.5.2 Part 91 Permit	Huron School District will ensure that any construction activity that results in a land disturbance greater than or equal to one (1) acre, disturbs less than one (1) acre that is part of a common plan of development or sale which is great than or equal to 1 acre, or within 500 feet of a lake or stream will obtain a Part 91 Permit through the site plan review process.	As necessary Throughout Permit Cycle	100% of permits obtained.	Copy of permit and associated soil erosion and sedimentation control plans.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.4.5.3 Permit by Rule	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 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.	Documentation of Construction Stormwater Operator site inspection.	Huron School District
	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, if applicable.	Copy of NOC, if applicable.	Huron School District

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.

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 objectives of this program and associated procedures are to:

- Develop and implement a regulatory mechanism 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 Operations and Maintenance 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 Huron School District 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 Huron School District 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 plan for stormwater management in accordance with this guideline and the NPDES permit.

Huron School District has developed and passed a Board Resolution in November 2025, as the regulatory mechanism to direct compliance with these requirements. In addition to the Board Resolution, the following sections identify specific actions to be taken by Huron School District to ensure compliance with the applicable standards. A copy of the Huron School District School Board Policy Resolution is provided in Appendix B.

The Stormwater Program Manager or designee 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

Huron School District 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

Treatment methods should 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

Huron School District 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 of surface water systems.

Pretreatment measures include:

Stormwater Hot Spots	Minimum Pre-Treatment Options
Vehicle service and maintenance facilities	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
Fleet storage areas for buses	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
Vehicle Fueling Stations	1. Oil/Water Separators/Hydrodynamic Devices 2. Water Quality Inserts for Inlets 3. Spill Prevention Response Program
Vehicle equipment cleaning facilities	BMPs that are part of a Stormwater Pollution Prevention Plan (SWPPP)
Outdoor liquid container storage	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.

Huron School District 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 the 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, Huron School District 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, Huron School 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 Huron School District NPDES MS4

Stormwater Discharge Permit. Huron School District 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 requires site plan review, Huron School District 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
BMP #2.5.8.1 Regulatory Mechanism	Develop and implement regulatory mechanisms to address post-construction stormwater runoff for new development and redevelopment projects, including preventing or minimizing water quality impact. 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.	Post-Construction Policy & Procedure Developed and Board Resolution Passed in November 2025.	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.	Huron School District
BMP #2.5.8.2 Post Construction Standards	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 meet an equivalent post-construction standard for the township, city, or county.	Copy of calculations demonstrating channel protection standards and water quality treatment standards are met.	Huron School District
BMP #2.5.8.3 Site Specific	Huron School District will review construction plans for sites with known soil and/or groundwater contamination and identify potential “hot spots”. The use of infiltration BMPs will be evaluated based on site specific conditions 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.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.5.8.4 Site Plan Review	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.	As necessary Throughout Permit Cycle	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.	Obtain and maintain a copy of the site plan approval document and copy of calculations.	Huron School District
			If the development or redevelopment project discharges directly to the waters of the state, the district shall comply with the post-construction standards outlined in this SWMP. If the development or redevelopment project discharges to a county, city, or township MS4 that is not regulated or requires site plan review, Huron School District shall comply with the post-construction standards outlined in this SWMP.	Copy of calculations that demonstrate channel protection standards and water quality treatment standards are met.	Huron School District
BMP #2.5.8.5 Long-Term Operation & Maintenance of Stormwater Controls	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.	Within 30 days following the completion of a new facility or reconstruction/redevelopment site project. Throughout Permit Cycle	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.	All storm sewer site maps updated. Maintain all inspection, maintenance, and repair reports conducted by staff or contractors.	Huron School District

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 Huron School District to prevent and reduce pollutant/contaminant runoff from Huron School District 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 E.

2.6.3 Facility Assessment & Prioritization

Huron School District 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.

Huron School District considered the following when assessing each facility:

- 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 be implemented, if applicable.

BMPs currently implemented by Huron School District 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 40% of the total sump depth, as established by the EGLE[4].
    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 D.
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.

[4] Michigan Department of Environment, Great Lakes, and Energy (EGLE) Catch Basin/Street Sweeping Management

c. Dumpster good housekeeping practices.
d. Garden, green space and signage inventories.
e. "SEMCOG" poster placement at facilities.
f. "How to spot illicit discharge/ How to Report-Hotline Numbers" poster placement at facilities.
g. 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 Section 2.6.5 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.

Huron School District 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 waste 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 prior to discharge. Once dry, the solids should be disposed of in a licensed solid waste landfill in accordance with Part 115 of PA 451 (NREPA).
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 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 after the water in the sump is confirmed to be non-contaminated:
    - 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 contamination is expected based on visual inspection, a grab sample should be collected and analyzed before handling the materials and generating waste. While waiting for sample analysis, efforts should be taken to prevent stormwater from entering the storm sewer system.
    - 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:
        - Municipal sanitary sewer system (with prior approval from local sewer authority).
        - Application to the ground adjacent to the catch basin may be allowed on a site-specific basis. The EGLE Water Resources Division (WRD) Groundwater Discharge Program would need to be contacted to determine if application to the ground adjacent to the catch basin would be allowed and to complete the necessary requirements for that process.
    - The remaining liquid/solid in the sump will be collected with a vacuum truck and disposed of off-site in accordance with Part 115 of PA451 (NREPA) or treated as Liquid Industrial By-Products under Part 121.

Huron School District does not currently own or operate storm sewer cleaning or transportation equipment. Huron School District is responsible for meeting the liquid industrial by-products generator requirements under Part 121, even if the catch basins are cleaned out by a private contractor. If Huron School District contracts with a private contractor to transport liquids generated from cleaning of catch basins or other structures, that contractor must be registered and permitted to transport liquid industrial by-products under the provisions of the Hazardous Materials Transportation Act, 1998 PA 138, as amended.

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

Huron School District 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, land disturbance and landscaping. Bridge maintenance, right-of-way maintenance and unpaved road maintenance do not apply to Huron School District.

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.

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 Transportation and Maintenance Facility.

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 waste. The district has an interior bus wash on site.
2. Alternatively, rinse grass from lawn care equipment on permeable (grassed) areas.
3. 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 waste.
3. Any floor drain suspected to drain to the stormwater system will be dye traced as needed.
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. Provide adequate buffer areas at stream banks.
3. 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.

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. Huron School District evaluated each facility for the presence of the following factors:

- Potential for polluting activities to be conducted outside
- Proximity to water bodies
- Traffic volume
- Land use
- Absence of any factors

PROCEDURE

Huron School District does not own or operate sweeping equipment. However, Huron School District 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 to determine if it is suspected of being contaminated with hazardous material prior to disposal. Sediment or materials determined to be non-hazardous will be bagged and disposed of in a licensed landfill. Sediment or materials determined to be hazardous waste will be disposed under Part 115 requirements.
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.

Facility Name	Priority Level of Potential Discharge* (High, Med, Low)	Street Sweeping Schedule
Brown Elementary School	Low	Hand Sweeping, Spring and Fall
Huron High School/Renton Junior High School/Sunnyside Kindergarten Center/Transportation Facility	High	Monthly Inspections, Hand Sweep as Needed
Miller Elementary School	Low	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 Huron School District, the street sweeping activities are subject to the solid waste requirements. Solid waste must be managed under Part 115 requirements. Dispose of 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

Huron School District has established this procedure to prevent or reduce pollutant runoff from vegetated land:

1. Huron School District requires all contracted personnel who participate in the application of pesticides, to 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

Huron School District requires contractors to comply with pollution prevention and good housekeeping BMPs.

Prior to conducting work, contractors shall be provided a “Contractor Stormwater Acknowledgement” 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 “Contractor Stormwater Acknowledgement” form is located in Appendix F.

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 (PPGH) – BMP Table

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.1 Structural Control Inventory	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 or within 30 days following the completion of a new facility or development/ redevelopment. Ongoing Throughout Permit Cycle	100% of stormwater structural controls are inventoried.	Maintain list of inventories and potential to discharge priority level. Submit updated list with progress report, noting if priority levels have changed.	Huron School District
BMP #2.6.11.2 SWPPP development & implementation (SOP)	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.	Huron School District
BMP #2.6.11.3 Stormwater Structural Control Inspections	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.	Huron School District
BMP #2.6.11.4 Review for BMP's Implemented	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	Routine 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).	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.5 Prioritization of Storm Sewer Locations for Maintenance & Cleaning	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.	Huron School District
BMP #2.6.11.6 Cleaning & Maintenance (Catch Basin/ Manhole Cleaning)	Huron School District 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.	Huron School District
BMP #2.6.11.7 Roadways & Parking Lots	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.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.8 Cold Weather Operations	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.	Huron School District
BMP #2.6.11.9 Vehicle Washing	All vehicle washing and maintenance is to be performed indoors where drains connecting to the sanitary system can receive all waste. 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).	Huron School District
	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.	
BMP #2.6.11.10 Vehicle Maintenance	Any floor drain suspected to drain to the stormwater system will be dye traced as needed.	Throughout Permit Cycle	100% of floor drains inspected.	Copy of inspection report, as needed.	Huron School District
	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.	

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.11 Land Disturbance	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).	Huron School District
BMP #2.6.11.12 Street Sweeping	Conduct hand sweeping in the parking lots/roadways in the spring and fall.	Spring & Fall Throughout Permit Cycle	Hand sweep parking lots/roadways in the spring and fall	Copy of work order or schedule.	Huron School District
	Street sweeping conducted by a professional sweeping company.	As needed Throughout Permit Cycle	If needed, following inspections indicating higher traffic volume, land use or sediment and trash accumulation, sweeping of parking lots and streets shall be contracted.	Copy of invoice or disposal documentation.	
BMP #2.6.11.13 Vegetated Properties (Pesticides)	Huron School District requires all 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.	Huron School District

BMP	Description of BMP	Timeframe	Measurable Goal	Measure of Assessment	Responsible Party
BMP #2.6.11.14 Contractor Oversight	Huron School District requires contractors to comply with pollution prevention and good housekeeping BMPs. Huron School District will complete contractor notification, pre-project meeting and periodic inspections to provide oversight to ensure compliance. Prior to conducting work, contractors shall be provided with a Contractor Acknowledgement Form.	As needed Throughout Permit Cycle	Contractors trained and informed of pollution prevention and good housekeeping techniques.	Copy of sign-in sheets, Contractor Acknowledgement Form, pre-project meeting notes, or inspections.	Huron School District & Contractors/ Vendors
BMP #2.6.11.15 Training	Pollution prevention and good housekeeping training.	Once per permit cycle or during the 1st year of employment Throughout Permit Cycle	Goal of providing training to maintenance staff who work for Huron School District. **[All Stormwater Training is outlined in Section 3.0 Training]**	Copy of sign-in sheets and Agenda (if available).	Huron School District
BMP #2.6.11.16 Pollution Prevention & Good Housekeeping Activities Effectiveness Review	Review performance measures to evaluate the effectiveness of the Pollution Prevention and Good Housekeeping (PPGH) program. Items include catch basin cleaning documentation, catch basin maintenance records, SWPPP inspections, street sweeping documentation, and training activities.	Annually Throughout Permit Cycle	Annual review of SWMP PPGH program performed and copies of those reviews maintained on file.	Maintain copy of SWMP annual review and evaluation information for progress reporting.	Huron School District

3.0 Training

Huron School District will provide education and training for applicable employees and contractors using a variety of methods depending on their specific job function. The training program is categorized in three (3) different types of training, which are summarized below:

General Awareness Training

General Awareness training is encouraged for teachers, administrative staff, and support staff. 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.

Pollution Prevention & Good Housekeeping (PPGH)/ Illicit Discharge Elimination Program (IDEP) Training and Reporting

Pollution Prevention & Good Housekeeping/Illicit Discharge Elimination Program training is required for all employees whose job responsibilities include activities that could cause or witness an illicit discharge. This training includes instructions on identification and notification of illicit discharges or connections. This training is provided to applicable in-house custodial, maintenance, transportation, and food service employees.

Contractor Oversight

Contractors employed by Huron School District to conduct activities with a potential to impact water quality. Prior to conducting work, contractors shall be provided a "Contractor Stormwater Acknowledgement" form.

3.1 Training Table

BMP	Description	Measurable Goal	Target Audience	Timeframe
General Awareness Training	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. Huron School District will retain records of training for future review regarding SWMP.	Teachers, administrative and support staff.	Ongoing Throughout Permit Cycle
IDEP & PPGH Training	Pollution Prevention & Good Housekeeping, and Illicit Discharge Elimination Program	Record attendance with sign-in sheets for each training session. Huron School District will retain records of trainings for future review regarding SWMP.	In-house custodial, maintenance, transportation, and food service employees.	Required once during permit cycle for current employees and during the 1st year of employment for new employees. Throughout Permit Cycle
Contractor Oversight	Stormwater specific oversight for on-site contractors.	Utilize a "Contractor Stormwater Acknowledgement" form to review stormwater compliance with contractors hired to perform municipal operation and maintenance activities and to obtain signatures. Obtain records for future review of the SWMP.	Contractors employed by Huron School District to conduct activities with a potential to impact water quality.	Required at the time of employment or prior to completing work with a potential to impact water quality. Throughout Permit Cycle

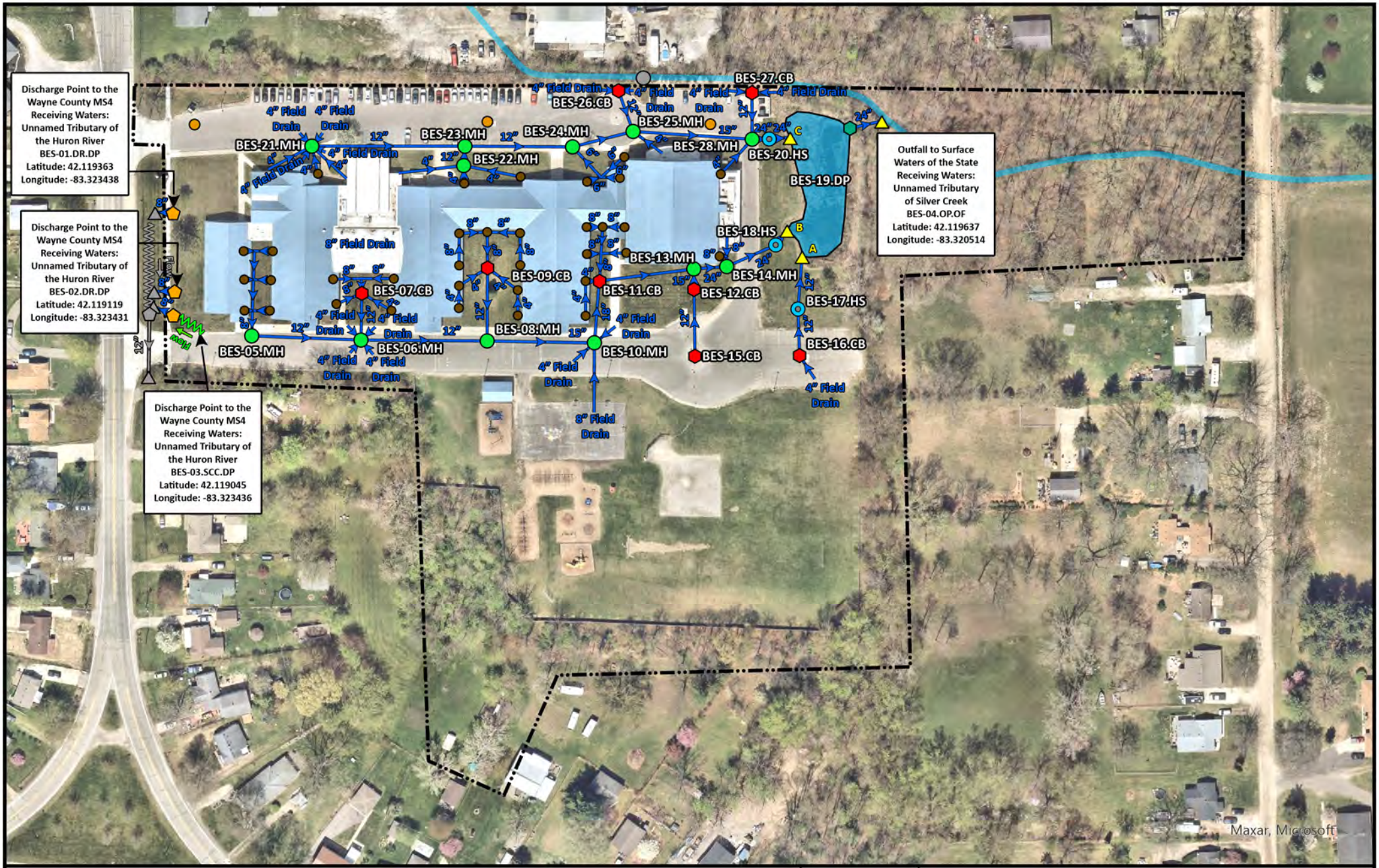
Appendix A

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

Receiving Waters Table
Permit Cycle 2026-TBD

Huron School District Receiving Waters Table Permit Cycle [2026-TBD]							
Facility	**Structure ID**	**Outfall or Point of Discharge**	**GPS Coordinates (Latitude/Longitude)**		**Point of Discharge / Receiving Regulated MS4 or Waters of the State**	**Receiving Waters**	**Watershed**
Brown Elementary School	BES-01.DR.DP	Point of Discharge	42.119363	-83.323438	Wayne County MS4	Unnamed Tributary	Huron River
	BES-02.DR.DP	Point of Discharge	42.119119	-83.323431	Wayne County MS4	Unnamed Tributary	Huron River
	BES-03.SCC.DP	Point of Discharge	42.119045	-83.323436	Wayne County MS4	Unnamed Tributary	Huron River
	BES-04.OP.OF	Outfall	42.119637	-83.320514	Surface Waters of the State	Unnamed Tributary	Silver Creek
HSD Huron High School/Renton Jr. High School/Ferguson Early Childhood Center/Sunnyside Kindergarten Center/Transportation Complex	HRF-01.SO.DP	Point of Discharge	42.123837	-83.343354	Wayne County MS4	Bancroft Noles Drain of the Huron River	Huron River
	HRF-02.OP.OF	Outfall	42.125859	-83.343639	Surface Waters of the State	Warner Drain	Huron River
	HRF-03.MH.DP	Point of Discharge	42.123409	-83.350490	Wayne County MS4	Bancroft Noles Drain of the Huron River	Huron River
Miller Elementary School	MIL-01.MH.DP	Point of Discharge	42.165729	-83.409438	Wayne County MS4	Bancroft Noles Drain of the Huron River	Huron River

Date Updated: November 21, 2025



Map Key

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- = Hydrodynamic Separator
- = Lift Station
- = Buried Structure
- = Abandoned Structure
- = Roof Drain
- = Cleanout
- = Access Lid
- = Underground Detention /Retention System
- = Pond/Basin
- = Bioretention Pond/Basin
- = Swale/Stormwater Conveyance Channel
- = Riprap
- = Culvert
- = Wetland
- = Marsh
- = Creek/River/ Drain/Pond/Lake
- = Gravel Lot/Road
- = Property Lines
- = Access Point

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25485 Middlebelt Road, New Boston, MI 48164

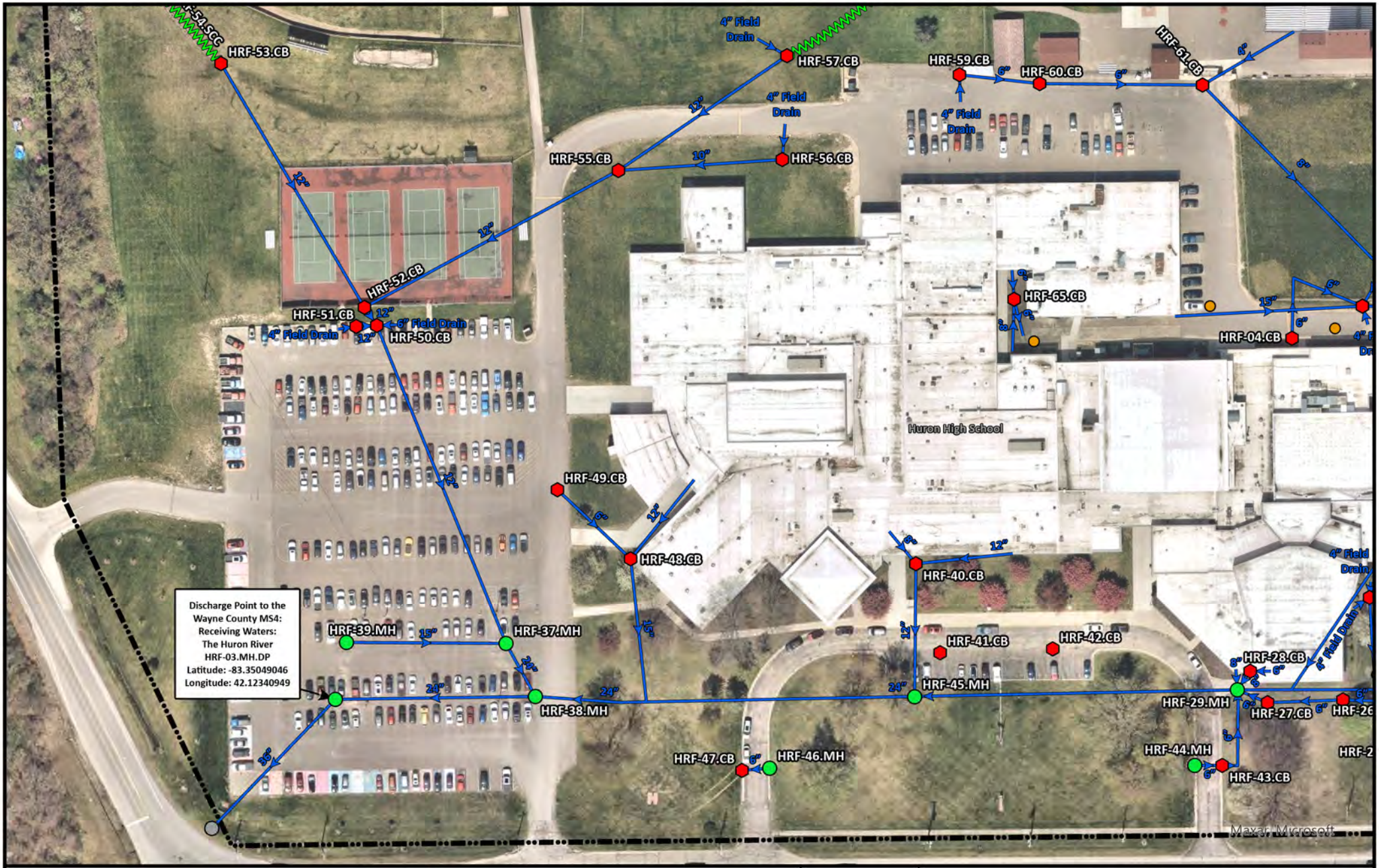
Brown Elementary School

Huron School District

Revision Date:	08/19/2025
Drawn By:	SLB
Reviewed By:	LEK
Page #:	1 of 1

0 65 130 Feet

environmental group
25510 W 11 Mile Road
Southfield, MI 48034
Phone (248) 426-0165
Fax: (248) 427-0305



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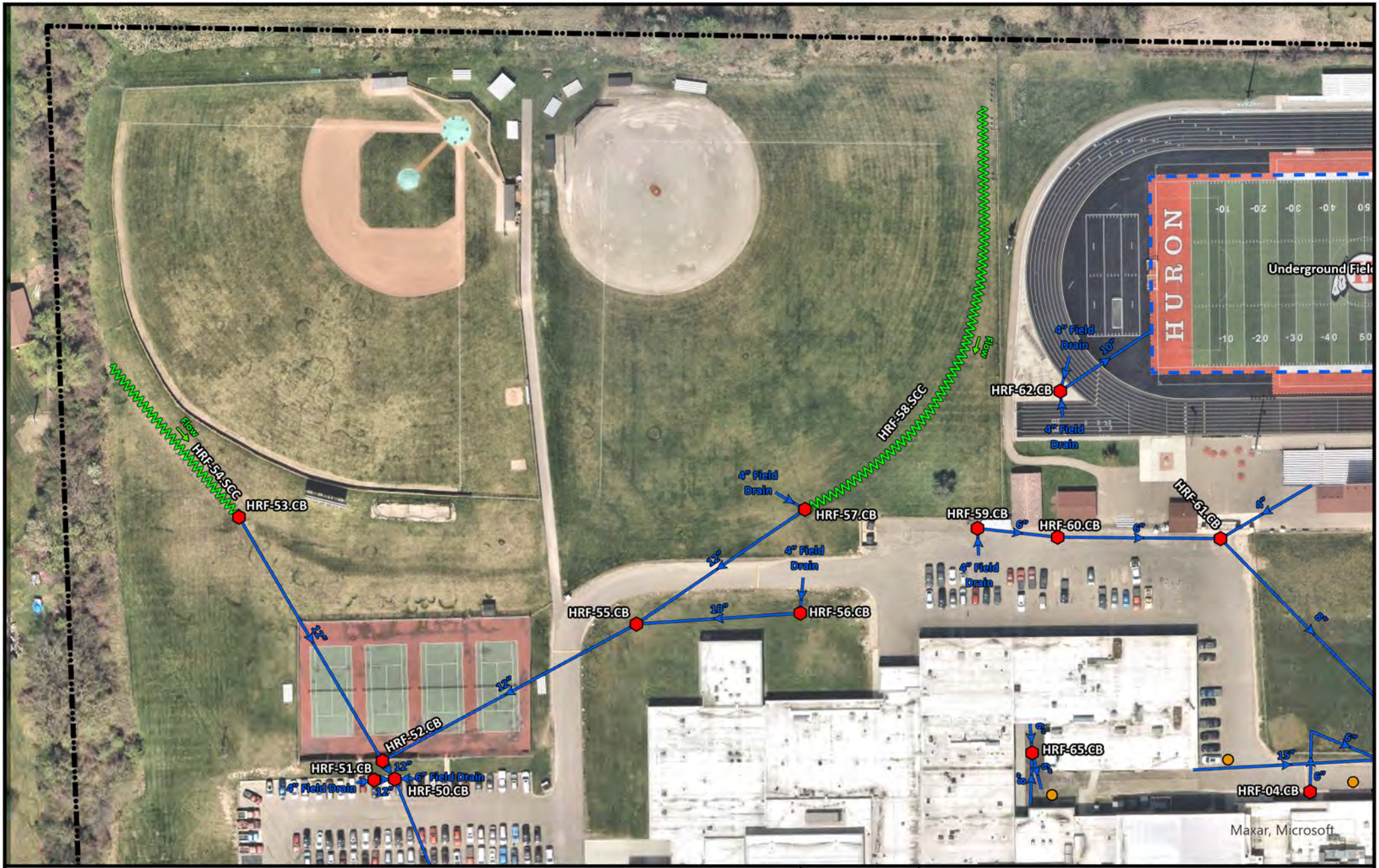
Huron High School / Renton Junior High School / Ferguson Early Childcare Center / Sunnyside Kindergarten Center / Transportation Complex

Huron School District

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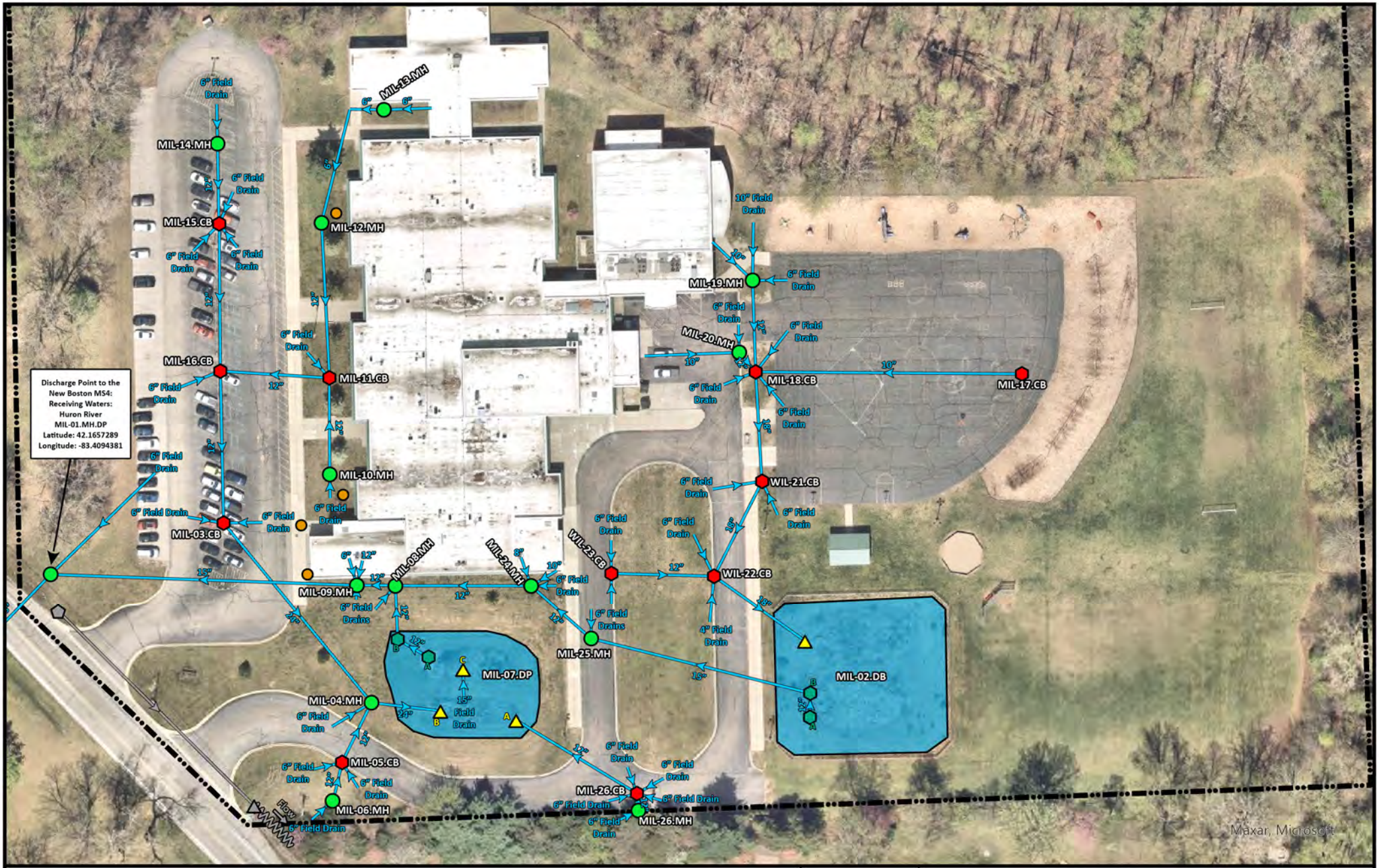
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18955 Hannan Rd, New Boston, MI 48164

Miller Elementary School

Huron School District

Revision Date:	08/14/2025
Drawn By:	CH
Reviewed By:	LEK
Page #:	1 of 2

environmental group
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Appendix B

Enforcement Policies and Tracking Forms

Huron School District
Board of Education
Resolution in Support of Stormwater Management Plan

WHEREAS Huron School District owns and operates facilities within the boundaries of the Detroit urbanized area which discharges stormwater though 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 Huron School District has applied for and received permit coverage to discharge stormwater from Huron School District facilities to the MS4; and

WHEREAS Huron School District agrees to comply with the NPDES Municipal Separate Storm Sewer System discharge permit requirements, and

WHEREAS Huron School District 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 Huron School District 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 Huron School District 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 Huron School District agrees to eliminate illicit discharges and illicit connections, and

WHEREAS Huron School District 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 Huron School District 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 Huron School District agrees to obtain an NPDES construction site stormwater permit from the Michigan Department of Environment Great Lakes and Energy for new development and redevelopment projects that disturb five or more acres, and

WHEREAS Huron School District agrees to use 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.

THEREFORE, be it resolved that Huron School District will enforce the above listed policies and procedures for illicit discharge elimination and control of stormwater runoff as part of the overall Huron School District Stormwater Management Program Plan.

Duly passed and approved by the Huron School District Board of Education, Wayne County, Michigan this 24th day of November, 2025

Approved:
Scott Ferguson
President

Attest:
Secretary

District Illicit Discharge/Illegal Dumping Reporting Form
Huron School District

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 ENFOREMENT 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:_____

Municipal Separate Storm Sewer System Noncompliance Enforcement Tracking
Huron School District
Permit No. PENDING

Report Number	Name	Date	Location of Violation	Business/ Organization	Description of Violation	Description of Enforcement Response	Compliance Schedule Date	Date Violation Resolved
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								

Stormwater Management – Illicit Discharge Regulatory Policy

Huron School District
Permit Number: Pending Issuance

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 Huron School District properties.

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. Huron School District 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 Huron School District 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 Huron School District at (734) 782-2441.

Stormwater Management - Post-Construction Policy & Procedure

Huron School District
Permit Number: Pending Issuance

Applies To: As required by the National Pollutant Discharge Elimination System (NPDES) permit for Huron School District, 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.

Post-Construction Requirements Policy Statement

Huron School District development and redevelopment projects on District property are regulated under and must comply with the Huron School District 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

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 plan for stormwater management in accordance with this guideline and the NPDES permit.

Water Quality Treatment Volume Standard

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

a. Treat the first one (1) inch of runoff from the entire site.
   OR
b. 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

Total Suspended Solids

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

a. A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff.
   OR
b. 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.

Huron School District 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, Huron School District 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, Huron School 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 Huron School District NPDES MS4 Stormwater Discharge Permit. Huron School District 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, Huron School District 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

The Huron School District 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

SEMCOG Posters & Illicit Discharge Poster

How to Spot Illicit Discharges

Illegal Dumping, Spills, or Floor Drain Connection Observations:

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






Sanitary Sewer Discharge Observations:

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




Agricultural Runoff, Fertilizers, or Sanitary Sewer Waste Observations:

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



What to Report

- **Spills and Contamination to lakes, river, and streams**
  District Stormwater Coordinator, EGLE, Environmental Health Department, Drain Commissioner's Office
- **Suspicious dumping or discharges from pipes**
  District Stormwater Coordinator, EGLE, 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, EGLE, 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-Hr Spill Hot Line–Arch Environmental Group	**1-248-522-2821**

Non-Emergency

• **School District Stormwater Manager**	_____
• EGLE Environmental Assistance Center	**1-800-662-9278**
• Eaton County Drain Commissioner	**1-800-292-4706**
• Genesee County Drain Commissioner	**1-810-732-2940**
• Ingham County Drain Commissioner	**1-517-676-8395**
• Jackson County Drain Commissioner	**1-517-788-4398**
• Macomb County Public Works	**1-877-679-4357**
• Muskegon County Drain Commissioner	**1-231-724-6219**
• Oakland County Water Resources	**1-248-858-0958**
• St. Clair County Drain Commissioner	**1-810-364-5369**
• Washtenaw County Drain Commissioner	**1-724-222-6860**
• Wayne County Department of the Environment	**1-888-223-2363**

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

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Southeast Michigan Council of Governments

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)

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Southeast Michigan Council of Governments



Keeping it Clean

Municipal operations for clean water

Dumpsters and loading docks



Keep dumpster lids closed and inspect for leaks.
Never place hazardous wastes in a dumpster or trash bin.
Do not hose 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 street 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., salt, 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.

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Funding provided, in part, by the Rouge River National Wet Weather Demonstration Project grant #XP993743-06, and SEMCOG, the Southeast Michigan Council of Governments.

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.

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.

Ours to Protect



Fertilize sparingly and caringly

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.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.

Seven Simple Steps to Clean Water

Our Water. Our Future.

Ours to Protect

1. Help keep pollution out of storm drains
2. Fertilize sparingly and caringly
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.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, it's not just toxic to you

Our Water. Our Future.

Ours to Protect



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.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 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.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, 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.

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.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.

KEEP OUR WATER CLEAN

onewater

mionewater.com



CLEAN UP AFTER YOUR PETS

KEEP OUR WATER CLEAN



onewater

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IF YOU SEE POLLUTION, REPORT IT

BUILD ON WATER QUALITY

onewater

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DISPOSE OF ALL GREASE IN THE TRASH

KEEP OUR WATER CLEAN

onewater

mionewater.com

ONLY RAIN DOWN THE STORM DRAIN

BUILD ON WATER QUALITY

onewater

mionewater.com

ONLY RAIN DOWN THE STORM DRAIN

Appendix D

Inspection Field Worksheets

Routine Storm Sewer System Inspection Table

Building:			**Client:**	
Inspectors:			**Start Date:**	
			Inspection Type:	

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

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Routine Storm Sewer System Inspection Table

Building:	"School/Location"		**Client:**	"School District"	
Inspectors:	"Inspectors Name"		**Start Date:**	"Start Date"	"End Date"
			Inspection Type:	"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 40% full sump depth below outpipe or higher, moderate - for 30% to 40% 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)

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Pond Inspection Form

Building:		**Client:**	
Inspectors:			
Date of Inspection:			

Structure Information:

Structure ID:		Number of Inlet(s) (OP):	
Pond Type:		Number of Outlet(s) (DR):	
Age of Pond:		Number of Stabilized Outlets (SO):	

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

Are there any structural issues with the inlet(s)/outlet(s) (OP/DR)?		Structural Comments:	
Is there excess sediment buildup at the inlet(s)/outlet(s) (OP/DR)?		Are the inlet(s)/outlet(s) (OP/DR) below the water level?	

Are the inlet(s)/outlet(s) (OP/DR) accessible or overgrown with vegetation?

Pond Structure Observations:

Is there grass along the sides of the pond cut between 4" and 9"?		Is there excess vegetation along the sides of the pond (not grass)?	
Are there signs of erosion along the side slopes, berms and/or emergency spillway?		Is there evidence of animal burrows around the sidewalls of the pond?	

Pond Vegetation Observations:

How much emergent vegetation is present in the pond bottom?		Vegetation Comments:	
Is emergent vegetation made up of native or invasive species?		Is there decomposing vegetation or organic matter decaying on the pond bottom?	

General Pond Observations:

Is the pond free of trash/other debris?		Types of trash/debris present:	

General Comments:

Arch Environmental Group
37720 Interchange Drive,
Farmington Hills MI 48370

Phone: (248) 426-0135
Fax: (248) 426-0136
www.archenvgroup.com

Pond Inpsection Table Description

ID #	Enter structure ID
Type	Select from the following options: Retention Pond, Detention Pond, Retention Basin, Detention Basin
Inspected	Select Yes or No. If unable to inspect the structure, please make a comment under "General Comments" as to why you could no inspect the structure
Approximate Age of the Pond	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
Number of Inlet(s) (OP)	Select the number of inlet pipe(s) from the drop down menu
Number of Outlet(s) (DR)	Select the number of outlet pipe(s) from the drop down menu
Number of Stabilized Outlet(s) (SO)	Select the number of stabilized outlet(s) from the drop down menu
Are there any structural issues with the inlet(s)/outlet(s) (OP/DR)?	Examples include detached pipes, missing riprap around the inlet(s), missing stone around DR, etc. Select one of the following options: None, Preventative, Moderate, Signficant, 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
Structural Comments	Describe the structural issues observed
Is there excess sediment buildup at the inlet(s)/outlet(s) (OP/DR)?	Examples include pipes that are buried under sediment or sediment levels higher than the bottom of the inlet(s)/outle
Are the inlet(s)/outlet(s) (OP/DR) below the water level?	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
Are the inlet(s)/outlet(s) (OP/DR) accessible or overgrown with vegetation (native or invasive)?	Overgrown vegetation at the inlet(s)/outlet(s) can prevent water from freely flowing in/out of the structure
Is the grass along the sides of the pond cut between 4" and 9"?	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
Is there excess vegetation along the sidewalls of the pond (not grass)	Does the area look overgrown and unkept? Select from the following options: Yes or No
Are there signs of erosion along the side slopes, berms and/or emergency overflow?	Select from the following options: Yes or no
Is there evidence of animal burrows around the sidewalls of the pond?	Select from the following options: Yes or No. Animal burrows can destabilize the sidewalls of the pond
How much emergent vegetation is present in the pond bottom?	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
Is emergent vegetation made up of native or invasive species (phragmites or purple loosestrife)?	See reference page in the Pond Inspection Reference page for photos of Phragmites and Purple Loosestrife to see if it is present.
Vegetation Comments	If there are invasive species present, please write which ones are present
Is there vegetation or organic matter decaying on the pond bottom?	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
Is the pond free of trash/other debris?	Select from the following options: Yes or No. This can include trash/inorganic debris or organic material (like grass clippings, leaves, etc.)
Types of trash/debris present	Select from the following options: Trash, Natural Debris (organic material) or N/A
General Comments	Please add any other comments that you feel are important to note about the pond condition

Screening Inspection Log

Building:		**Client:**	
Inspectors:		**Date**	
		Inspection Type:	

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:

Photo ID:

Arch Environmental Group
37720 Interchange Drive,
Farmington Hills MI 48370

Phone: (248) 426-0135
Fax: (248) 426-0136
www.archenvgroup.com

Appendix E

Property Structural Controls Inventory, Inspection, & Maintenance Schedule

Huron School District - Brown 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
Brown Elementary School 25485 Middlebelt Road, New Boston, MI 48164	Low	Catch Basins/Manholes	20	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is between 30% and 40% of the Total Sump Depth
		Open Pipe Outlets	1	Inspect Annually, Maintain as Needed
		Drainage Receptors	2	Inspect Annually, Maintain as Needed
		Detention Ponds	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channels	1	Inspect Annually, Maintain as Needed
		Hydrodynamic Separators	3	Inspect Annually, Maintain as Needed

Revision Date: 12/29/2025

Huron School District - Huron High School / Renton Jr. High / Ferguson Eearly Childhood Center / Sunnyside / Transportation Complex

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
Huron High School / Renton Jr. High / Ferguson Eearly Childhood Center / Sunnyside / Transportation Complex 32044 Huron River Drive, New Boston, MI 48164 (High School) / 31578 Huron River Drive, New Boston, MI 48164 (Renton) / 24678 Merriman Road, New Boston, MI 48164 (Ferguson and Sunnyside) / 24820 Merriman Road, New Boston, MI 48164 (Transportation)	High The Transportation Facility is a high priority facility to potentially pollute. That site is part of this complex and maintains a separate SWPPP SOP, which includes an additional Structural Control Inventory, Inspection, & Maintenance Schedule specific for that facility.	Catch Basins/Manholes	60	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is between 30% and 40% of the Total Sump Depth
		Open Pipe Outlets	1	Inspect Annually, Maintain as Needed
		Trench Drains	1	Inspect Annually, Maintain as Needed
		Detention Basins	1	Inspect Annually, Maintain as Needed
		Stormwater Conveyance Channels	2	Inspect Annually, Maintain as Needed
		Stabilized Outlets	1	Inspect Annually, Maintain as Needed

Revision Date: 12/29/2025

Huron School District - Miller 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
Miller Elementary School 18955 Hannon Road, New Boston, MI 48164	Low	Catch Basins/Manholes	25	Inspect Annually, Clean Once per Permit Cycle or if Build-Up of Accumulated Solid Material is between 30% and 40% of the Total Sump Depth
		Retention Basins	0	Inspect Annually, Maintain as Needed
		Detention Ponds	2	Inspect Annually, Maintain as Needed

Revision Date: 12/29/2025

Appendix F

Contractor Oversight & Employee Training Documentation

Huron School District
Contractor Stormwater Acknowledgement

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

The purpose of this acknowledgement form is to communicate the HSD requirements for pollution prevention and good housekeeping while the contractor is on district property, conducting municipal operation and maintenance activities. Those activities may include snow removal, landscaping/lawn care, pest control, vehicle maintenance, construction, and waste management. The ultimate goal of the HSD pollution prevention and good housekeeping program is to prevent leaks, spills, and other releases of any non-stormwater materials to the ground, MS4, or Surface Waters of the State.

While conducting municipal operations and/or maintenance activities while on HSD property, contractors shall, to the maximum extent practicable, adhere to the following guidelines:

- Prevent the discharge of fluids from vehicle fueling and maintenance activities, which may include fuels, oils, and other petroleum products.
- Prevent the discharge of pollutants from storage, handling, and disposal of construction products, materials, and wastes.
- Prevent the discharge of soaps, solvents, detergents, and wash water from construction activities, including paint, form release oils, and curing compounds.
    - These fluids should be collected and properly disposed of in a manner to prevent contact with stormwater and prevent discharge of these pollutants.
    - This includes the rinsing and washing of paint application equipment for athletic field marking and parking lot striping.
- Minimize the discharge of pollutants from vehicle and equipment washing, wheel wash water, and other types of washing.
    - Vehicle washing activities using soaps or detergents shall occur indoors, where the discharge of the wash water is directed to drains that connect to the sanitary system
    - Alternatively, lawn equipment may be rinsed off in permeable (grassed) areas.
- Concrete wash water should be directed into a leak-proof container. Once hardened, the concrete waste shall be disposed of properly.
    - For any liquid concrete waste, those shall be disposed of properly and not be discharged to the MS4 or surface waters of the state.
- Prevent the discharge of hazardous or toxic wastes and sanitary wastes.
- Place temporary stockpiled material, such as sand, gravel, asphalt millings, and soil away from storm drains.
    - Place stockpiled material on permeable (grassed) areas.
    - Berm or cover stockpiled material when not in use to prevent material releases into storm drains.
- During snow removal operations, stockpile plowed snow from parking lots in permeable (grassed) areas away from storm drains to prevent discharges during snowmelt.
- During salt application, use the least amount of salt to be effective at ice melt for the conditions.
- Report any other discharge from the potential pollutant-generating activities not addressed above to Huron School District.

_____

Name of Business

_____ _____

Business Representative Signature Date

IDEP/PPGH STORMWATER TRAINING RECORD

Client
Huron School District Permit No. PENDING

Location

Date

Illicit Discharge Elimination Program (IDEP): Training on techniques for identifying illicit discharges and connections, Training on procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.
Pollution Prevention & Good Housekeeping: Training on BMPs that are important such as good housekeeping, spill response, materials storage and handling, landscape maintenance, street maintenance, fleet maintenance, and garages.

Employee Name	Employee Signature	Job Title/Department

Instructor Name

Instructor Signature

Arch Environmental Group, Inc.
248-426-0165