

DeWitt Charter Township

Storm Water Pollution Prevention Initiative (SWPPI)

Submitted to:

**State of Michigan Department of Environmental Quality
Water Bureau**

June 2010

1.0 General Information

This Storm Water Pollution Prevention Initiative is being submitted by DeWitt Charter Township in accordance with the Township's Certificate of Coverage No. MIG610093, under the Michigan Department of Environmental Quality (MDEQ) General Storm Water Discharge Permit MIG610000. DeWitt Charter Township lies within the watersheds of the Looking Glass River and the Grand River.

The following document is an update to the October 2006 Storm Water Pollution Prevention Initiative (SWPPI). As required by our Certificate of Coverage, on or before July 1, 2010, the Township is required to submit a revised/updated SWPPI.

The SWPPI shall include the revisions/updates to the Public Education Plan (PEP) and the Illicit Discharge Elimination Plan (IDEP) as appropriate. A final post-construction control ordinance will be submitted on or before July 1, 2011. The Township is expected to implement the SWPPI upon submittal.

2.0 GLRC

The Greater Lansing Regional Committee on Phase II Non-Point Source Pollution Prevention (GLRC) is a guiding body comprised of participating Phase II communities within the Greater Lansing Region. The Committee has been established to guide the implementation of the entire Phase II Program for the communities within three identified watersheds: the Grand River, the Red Cedar River and the Looking Glass River watersheds.

The participating Phase II communities that make up the GLRC are as follows:

- DeWitt Public Schools
- City of DeWitt
- City of Grand Ledge
- City of Mason
- Delhi Charter Township
- Delta Charter Township
- DeWitt Charter Township
- City of East Lansing
- Lansing Charter Township
- Michigan State University
- City of Lansing
- Meridian Charter Township
- Oneida Charter Township
- DeWitt Public Schools
- Lansing Public Schools
- Windsor Charter Township
- Clinton County
- Eaton County
- Ingham County

For more information on the GLRC, visit <http://www.mywatersheds.org>.

3.0 Storm Water Pollution Prevention Initiative (SWPPI)

The purpose of the SWPPI is to detail the specific actions that DeWitt Charter Township has determined will be implemented to meet the goals and objectives of the Looking Glass River and Grand River Watershed Management Plans. The SWPPI is intended to reduce the discharge of pollutants to the maximum extent practical and to be consistent with the Watershed Management Plans.

The main components of the SWPPI are:

1. Actions to address the goals and objectives in the Watershed Management Plans.
2. Pollution prevention and good housekeeping activities.
3. Post construction controls for areas of new development and significant redevelopment.
4. Methods of assessing progress in storm water pollution prevention.

Table A illustrates the commitments that DeWitt Charter Township will make to implement the Watershed Management Plans. The table addresses the main components of the SWPPI by providing specific action steps, timelines, and material and labor estimates for addressing the respective actions in the Watershed Management Plans; including objectives to address pollution prevention, good housekeeping, and post-construction controls; and describing the evaluation criteria for measuring completion of the respective actions.

The implementation of the items in the SWPPI and the associated tables apply to the Township's two main complexes. The two complexes are the Township Hall/Fire Station and the Community Center/Valley Farms. While not required to, for the betterment of the environment, the Township will make its best effort to implement these requirements at its other Township properties. The remaining Municipal Separate Storm Sewer System (MS4) within the boundaries of DeWitt Charter Township is under the control of and managed by the Clinton County Drain Commission. Specifically, the Township is only responsible for the MS4 on its property located at its two complexes and the rest of the storm water system is controlled by the Clinton County Drain office.

3.1 SWPPI requirements

The Michigan Department of Natural Resources and Environment (MDNRE) requires that six specific items be address in the submission of the 2010 SWPPI. Those items are:

- Total Maximum Daily Load (TMDL)
- Public Education Plan (PEP)
- Illicit Discharge Elimination Plan (IDEP)
- Post-Construction storm water control for new developments and redevelopment projects
- Construction storm water runoff control
- Pollution prevention and good housekeeping activities for municipal operations

3.2 Total Maximum Daily Load (TMDL)

The MDNRE requires permittees to monitor E. coli and Phosphorus in 50 percent of major discharge points. A major discharge point is a pipe or conveyance measuring more than 36 inches. The Township does not need to comply with this requirement. The

complexes that the Township is responsible for do not have discharge points greater than 36 inches.

3.3 Public Education Plan (PEP)

The permittee shall submit a Public Education Plan (PEP) as part of the SWPPI. The purpose of the PEP is to educate the public as to the effects of discharging pollutants into storm water and ways in which they can prevent pollution from entering the waterways of the State of Michigan.

The GLRC has a Public Education Program Committee that is charged with helping members meet this requirement. The PEP Committee guides the overall Public Education and Participation Process for the Watershed Management Planning effort.

The PEP Committee has provided the PEP, which is in Appendix A of this document. As required, the document has been updated by DeWitt Township.

3.4 Illicit Discharge Elimination Plan (IDEP)

The MDNRE requires the permittee to detect and eliminate illicit connections and discharges to the storm water system (MS4s). An illicit connection is any discharge to an MS4 that is not composed entirely of stormwater. The Township's evaluation of illicit discharges will be limited to its two complexes.

As of this report submission, the Township has checked all drains on its complexes and has found no illicit discharges. Please note that the Township's storm water drainage system connects into Clinton County's covered drain system.

As part of the Township's IDEP, the Township will:

1. At least once every five years the Township will perform a dry-weather screening of its last manhole or detention basin before it connects to the Clinton County drain system. This review will look for issues related to water clarity, color, and odor; the presence of suds, oil sheens, sewage, floatable materials, bacterial sheens, algae, and slimes; staining of the banks and unusual vegetative growth.
2. If an illicit discharge is detected with an obvious source, it is to be eliminated. If the source is not obvious, additional testing will be performed and a plan will be created to eliminate the discharge.
3. A program to train staff will be created. Staff to attend will be the Manager's Office, Maintenance/Grounds, and Fire. These staff members have activities that may lead to or have the ability to detect illicit discharges on Township property. Additionally, building staff will attend training. The Township does not have responsibilities to monitor illicit discharges into the Clinton County drain system; however, it is in the best interest of the environment and thus the citizens of DeWitt Township to notify Clinton County if an illicit discharge is observed. Because of the nature of their work, building staff has the opportunity to witness

possible illicit discharges while in the field. By attending training, they will be another set of eyes and be able to notify the Clinton County Drain Office for any observed areas of concern.

The training shall include the following:

- a. The definition of illicit discharges and connections.
- b. Techniques for finding illicit discharges, including field screening, source identification, and recognizing illicit discharges and connections.
- c. Methods for eliminating illicit discharges and proper enforcement response.
- d. Additionally, while not required as part of the IDEP, staff will be trained in best practice recommendations.

The IDEP will be considered effective and successful if no illicit discharges are identified or if any discoveries are resolved within six months or sooner where possible.

3.5 Post-Construction Storm Water Control for New Developments and Redevelopment Projects

The GLRC is currently working within its committee system to develop model ordinance(s) or other regulatory mechanism to address Post-Construction Storm Water Control for New Developments and Redevelopment Projects. The Township has assigned its planning consultant to be part of this committee to provide assistance in drafting the ordinances, policies, and/or best management practices (BMP). Our Certificate of Coverage requires that the Township will adopt requirements Post-Construction Storm Water Control for New Developments and Redevelopment Projects by July 1, 2011, to address this issue.

3.6 Construction Storm Water Runoff Control

The Township has no direct responsibility for this requirement, but works closely with the Clinton County Drain Commission. DeWitt Township requires all development projects subject to formal review (i.e. those subject to Site Plan Review or Special Use Permits under Chapter VII of the Township Zoning Ordinance), must meet certain standards before the Township will grant approval for the project. Section 7.3.2 (4) of the Zoning Ordinance (for Site Plan Reviews) and Section 7.4.3(4) of the Zoning Ordinance (for Special Use Permit applications) states that each application shall "Be served adequately by essential public facilities and services, such as highways, streets, police, fire protection, *drainage structures*, refuse disposal, water and sewage facilities, or schools" (emphasis added). In order to assure that this requirement is met with development proposals, the Township routinely sends a copy of each application to the Clinton County Drain Commissioner (pursuant to Section 7.3.1 of the Township Zoning Ordinance for Site Plan Reviews and Section 7.4.1 for Special Use Permits.). Applicants are required to demonstrate that the proposed project will comply with the design

standards of the Clinton County Drain Commissioner. To enforce this requirement, the Township withholds issuance of building permits until the applicant provides written confirmation that the Drain Commissioner's standards have been met. In addition, the Township will not issue a Certificate of Occupancy on a development project until the applicant has provided confirmation from the Drain Commissioner's office that the construction has been completed in accordance with the Drain Commissioner's requirements.

Because the Drain Commissioner's office has control and responsibility for the issuance of soil erosion and sedimentation permits, they have the ultimate responsibility for the Construction Storm Water Runoff Control; however, it is in the best interest of the environment and thus the citizens of DeWitt Township to notify Clinton County if soil erosion and sedimentation issues are observed. Because of the nature of their work in the field, staff in the Building Department has the opportunity to witness issues. Because of this, they will be instructed on issues to watch out for and be instructed to notify the Clinton County Drain Office when necessary. If the contamination issue is outside the control of the Clinton County Drain Office, the issue will be reported to the MDNRE.

3.7 Pollution Prevention and Good Housekeeping activities for Municipal Operations

As part of its municipal operations, the MDNRE requires the following to be addressed:

- a) Employee/Contractor Training related to storm water management activities.
 - i. By the end of 2010, the Township will train all relevant employees to ensure that they are aware of potential storm water pollutant sources (see section 3.3 question 3 above). New employees in the maintenance/grounds department will be trained within their first year of employment.
 - ii. Contractors performing work on Township grounds that may lead to potential storm water pollutants will include language in their contract to ensure that they are following best management practices.
- b) Structural Storm Water Control Effectiveness
 - i. Catch and detention basins will be inspected once every five years.
 - ii. See attached map in Appendix D for the location of structural storm water controls at the Township's complexes
 - iii. Once every five years, the Township will contract with the Clinton County Drain Commission Office to clean out our catch basins. They are familiar with appropriate disposal procedures.
- c) Roadways, Parking lots, and Bridges. This section only applies to the Township complex parking lots (i.e. not roadways and bridges). The Township, to the best of its ability, will prevent and/or limit pollutants and

sediment from entering the Township's MS4. The major effort that the Township has undertaken is the contracting with the City of DeWitt to sweep the Township Hall parking lot twice a year. As our finances allow, this will be continued.

- d) Fleet Maintenance and Storage Yards. The Township does not have to comply with this section because we have no exposure. We have no significant materials stored or residues deposited or handled in an area exposed to storm water runoff. Nor does our housekeeping at our complexes leave significant materials exposed to storm water runoff.
- e) Managing Vegetated Properties. After the current contract expires (end of 2010), the Township will no longer apply phosphorus fertilizer, unless testing has been done in the last four years that demonstrates a need.

3.8 Facility Contact Person

The person responsible for overseeing compliance with the requirements of this permit shall be the then current Township Manager.

3.9 Retention of Records

The latest approved version of the SWPPI shall be retained until three years after coverage under this permit terminates. All records and information resulting from the assessment of SWPPI effectiveness shall be retained for three years.

4.0 GLRC Committee Commitments

In addition to the specific DeWitt Charter Township commitments, the Watershed Management Plans include commitments by the respective committees of the GLRC. The Township proposes to continue its active participation in the GLRC to see that these components of the Watershed Management Plans are implemented.