



C I T Y O F  
Springfield

# STORM WATER MANAGEMENT PLAN FOR THE CITY OF SPRINGFIELD

## Abstract

The Storm Water Management Plan is the document which contains the primary compliance elements for the City of Springfield's Municipal Separate Storm Water System (MS4) Permit.

September 2026



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## Public Participation/Involvement Program (PPP)

### *Purpose*

To establish an effective framework for involving those within the Greater Battle Creek Area, including storm water management permittees, agencies, organizations, and the general public, to help modify and implement Stormwater Management Plans (SWMP) in the Greater Battle Creek area.

### *Part 1. General Information*

The storm water management plan and public participation/involvement program (PPP) are developed for the Kalamazoo River Mainstem 2 watershed. The Municipal Separate Storm Sewer System (MS4) permittees submitting this PPP are: the Calhoun County Water Resources Commissioner, the City of Battle Creek, and the City of Springfield. They comprise the primary members of the Battle Creek Area Clean Water Partners.

### *Part 2. Building the Team*

| Stakeholders within the Stormwater Management Area                                                                                                                                                                                                                                                                                                                                                                                                                               | Tools To Foster Participation                              | Participation Responsibilities                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-------------------------------------------------------|
| Permittees identified in Part 1. Permittee committee members may act as a representative for varying departments within their individual organizations, such as the Public Works Department, the Parks and Recreation Department, the Planning Department, the Transportation Department, the Soil Erosion and Sedimentation Control Department, or other applicable departments. The BCACWP expects each member to communicate with the appropriate department as issues arise. | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Nested Jurisdictions <ul style="list-style-type: none"><li>• Battle Creek Public Schools</li><li>• Hart-Dole-Inouye Federal Center</li><li>• Lakeview School District</li><li>• Kellogg Community College</li><li>• Calhoun County Road Department</li><li>• Calhoun County Justice Center Complex</li><li>• Calhoun County Toeller Building</li></ul>                                                                                                                           | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Calhoun Conservation District Representative                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                            |                                                       |

|                                                                                                                                                                                                                                                       |                                                                                |                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|-------------------------------------------------------|
|                                                                                                                                                                                                                                                       | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Trout Unlimited Representative                                                                                                                                                                                                                        | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Lake Allegan/Kalamazoo River Watershed Phosphorus TMDL Representative                                                                                                                                                                                 | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Greater Battle Creek Area Business/Industry Representative/s                                                                                                                                                                                          | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Battle Creek Area Mathematics and Science Center Representative                                                                                                                                                                                       | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Citizen Volunteers / General Public                                                                                                                                                                                                                   | Public Notice                                                                  | BCACWP Chair, Vice Chair, or Committee Representative |
| Michigan Department of Transportation Representative                                                                                                                                                                                                  | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Calhoun County Health Department Representative                                                                                                                                                                                                       | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Lake Associations: Goguac Lake, Graham Lake, St. Mary's Lake (For those lakes without an association, the BCACWP will encourage its development.)                                                                                                     | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Binder Park Zoo Representative                                                                                                                                                                                                                        | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Special Interest Groups: <ul style="list-style-type: none"> <li>• Leila Arboretum</li> <li>• Audubon Society</li> <li>• Ducks Unlimited</li> <li>• Pheasants Forever</li> <li>• Sierra Club</li> <li>• Southwest Michigan Land Conservancy</li> </ul> | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Kalamazoo River Watershed Council                                                                                                                                                                                                                     | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Natural Resources Conservation Service Representative                                                                                                                                                                                                 | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Michigan Department of Environment, Great Lakes, and Energy Representative from: <ul style="list-style-type: none"> <li>• Land and Water Management Division</li> <li>• Water Bureau</li> </ul>                                                       | Direct, personal invitation (by either telephone or email)<br>Letter of invite | BCACWP Chair, Vice Chair, or Committee Representative |
| Homebuilders Association Representative                                                                                                                                                                                                               | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Michigan Department of Natural Resources: <ul style="list-style-type: none"> <li>• Fisheries Division</li> <li>• Wildlife Division</li> </ul>                                                                                                         | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Potawatomi Resource, Conservation, and Development                                                                                                                                                                                                    | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |
| Farm Bureau Representative                                                                                                                                                                                                                            | Direct, personal invitation (by either telephone or email)                     | BCACWP Chair, Vice Chair, or Committee Representative |

|                                   |                                                            |                                                       |
|-----------------------------------|------------------------------------------------------------|-------------------------------------------------------|
| Firekeepers Casino Representative | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Kingman Museum Representative     | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Battle Creek Community Foundation | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Downtown Partnership              | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |
| Industrial Storm Water Permittees | Direct, personal invitation (by either telephone or email) | BCACWP Chair, Vice Chair, or Committee Representative |

### ***Part 3. Continuing Communication with Stakeholders***

The current, and most effective, means of committee communication has been the use of an electronic mail distribution list for all meeting notices to those on the committee. Other means of communication for events include posting information on the committee's existing website, [www.bcwater.org](http://www.bcwater.org); social media such as Facebook; the Community Calendar; the use of press releases for upcoming events, such as Krazy for the Kazoo, Kanoe the Kazoo, and the Children's Water Festival; and the use of local newsletters. Public Notice will be issued for the review of the SWMP final draft, in addition to electronic notification methods.

### ***Part 4. Timeline***

The BCACWP has developed the Greater Battle Creek Area Stormwater Management Plan (GBCAWMP). Should the plan be updated, the Partnership meetings will be the vehicle used.

| <b>Date</b>                              | <b>Task</b>                                                                                                    |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Quarterly: January, April, July, October | Battle Creek Area Clean Water Partnership meetings: Overall stormwater management issues discussed.            |
| Monthly                                  | Public Information and Education Subcommittee meetings: Stormwater information and education issues discussed. |
| As needed                                | Technical Advisory and Financial Subcommittees meet as needed.                                                 |

### ***Part 5. Coming to Agreement***

The BCACWP will use a majority vote to come to agreement on difficult issues with the voting share system outlined in the Memo of Understanding for the Battle Creek Area Clean Water Partnership. The BCACWP will also extend the opportunity for the public to comment on issues being considered. The agenda at regularly scheduled meetings will include a public comment item. The BCACWP will consider public comments as a whole and the opinion of constituents when voting. Public comments will also be considered on nonvoting issues. All points of view will be documented in meeting minutes with the final vote noted. Conflicts will be resolved by using conflict resolution techniques.

### ***Part 6. Adaptive Management***

The BCACWP Chair, Vice Chair, or committee representative will be responsible for contacting current and future committee members. MS4 permitted agencies identified in Part 1 will be required to participate on the BCACWP. *(Attendance of Nested Jurisdiction representatives will be subject to individual Letter of Agreements between the nested jurisdiction and their covering municipality.)*

In order to ensure greater participation of the MS4 permitted agencies; which is essential to increasing the overall level of public participation, each participating agency has signed a memo of understanding. This legal agreement will define the level of participation in the Public Information and Education Subcommittee.

The BCACWP welcomes the participation of all parties interested in helping with the development and implementation of the stormwater management plan. The Committee strives to make or maintain a dynamic team to accomplish the goals of the plan. To retain committee members, the BCACWP will try to schedule meetings at times and locations which are convenient to the majority. Also, the BCACWP will encourage participation of the non-mandatory members at a level at which they can commit. For example, some members may prefer to work on event-specific activities, such as Krazy for the Kazoo, when implementing the stormwater management plan. The BCACWP will also welcome suggestions and comments regarding the committee structure to improve attendance and participation.

Attendance will be taken at all meetings to track levels of participation. Success of the public participation process will be gauged in part by the number of invites who attend meetings versus how many were asked to attend. Should turnout be poor, the method of contact may be inadequate and will be adjusted to suit the invitee. Should a non-mandatory member's participation decrease, the Chair and/or Vice Chair will contact the individual to determine the cause. Should the reason pertain to the committee in some way, it will be brought before the committee for discussion and resolution.

### ***Part 7. Public Notice Procedures***

For the periodic review of the SWMP, BCACWP issues press releases, local newsletters and letters to the editor and social media messages to notify the public of meetings and opportunities to comment. The BCACWP's do not have specific procedures for press releases or public notices but does abide by the open meetings act which can be found at, [https://www.michigan.gov/documents/ag/OMA\\_handbook\\_287134\\_7.pdf](https://www.michigan.gov/documents/ag/OMA_handbook_287134_7.pdf).

## Public Education Plan

The Public Education Plan was developed collaboratively by the Battle Creek Area Clean Water Partners and it outlines the strategies the partners are and will continue to educate the public about storm water issues and concerns.

# Public Education Plan Components

| Public Education Plan Components for the Battle Creek Area Clean Water Partners |              |                                                                                                                                                                                                                                             |                 |         |          |      |             |                |                       |                              |                                                          |                              |
|---------------------------------------------------------------------------------|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|---------|----------|------|-------------|----------------|-----------------------|------------------------------|----------------------------------------------------------|------------------------------|
| PEP Category                                                                    | PEP Priority | Key Messages                                                                                                                                                                                                                                | Target Audience |         |          |      | Timetable   |                | Responsible Party     | Potential Delivery Mechanism | Measurable Goals                                         | Evaluation                   |
|                                                                                 |              |                                                                                                                                                                                                                                             | Res.            | Bus/Ind | Pub. Emp | K-12 | Development | Implementation |                       |                              |                                                          |                              |
| Public responsibility and stewardship                                           | H            | Definition of watershed                                                                                                                                                                                                                     | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Knowledge of the Kalamazoo River Watershed                                                                                                                                                                                                  | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  |                                                          |                              |
|                                                                                 |              | Purpose of protecting the Kalamazoo River Watershed                                                                                                                                                                                         | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  |                                                          |                              |
|                                                                                 |              | Ways individuals can affect the Kalamazoo River Watershed                                                                                                                                                                                   | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  |                                                          |                              |
| Stormwater discharge location and potential impacts                             | H            | Storm drains discharge to water bodies                                                                                                                                                                                                      | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Storm water discharged without cleaning                                                                                                                                                                                                     | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  |                                                          |                              |
|                                                                                 |              | Affect of storm water pollution on the Kalamazoo River Watershed                                                                                                                                                                            | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through l                  |                                                          |                              |
|                                                                                 |              | Education of neighborhood drainage areas and water bodies                                                                                                                                                                                   | X               | X       | X        |      | On-going    | On-going       | MS4 Permittees        | m                            |                                                          |                              |
| Public reporting of illicit discharges                                          | H            | Definition of an illicit discharge                                                                                                                                                                                                          | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through d                  | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Promotion of mechanism to report illicit discharges                                                                                                                                                                                         | X               | X       | X        |      | On-going    | On-going       | BCACWP                | a through d                  |                                                          |                              |
|                                                                                 |              | Water quality effects associated with illicit discharges and improper waste disposal                                                                                                                                                        | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through d, k               |                                                          |                              |
|                                                                                 |              | Identification of failing on-site septic systems - physical symptoms to watch for                                                                                                                                                           | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Consequences/penalties associated with illicit discharges and improper waste disposal                                                                                                                                                       | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
| Personal actions that can impact the watershed                                  | H            | Best Management Practices (BMPs) for:                                                                                                                                                                                                       |                 |         |          |      |             |                |                       |                              | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Car, pavement, and/or power washing (preferred cleaning materials and practices, including phosphate fee)                                                                                                                                   | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | b, c                         |                                                          |                              |
|                                                                                 |              | Pesticide use, fertilizer use, and their disposal                                                                                                                                                                                           | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Proper management of grass clippings, leaf litter, and animal wastes                                                                                                                                                                        | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through i                  |                                                          |                              |
|                                                                                 |              | Proper disposal of wash water                                                                                                                                                                                                               | X               | X       | X        |      | 2010        | 2011           | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Residential de-icer use                                                                                                                                                                                                                     | X               |         | X        |      | 2010        | 2011           | BCACWP                | b, c                         |                                                          |                              |
|                                                                                 |              | Effects of residential wastes on surface water                                                                                                                                                                                              | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through i                  |                                                          |                              |
| Waste management assistance                                                     | H            | Identification of household hazardous wastes (HHW) and available alternatives                                                                                                                                                               | X               | X       | X        | X    | On-going    | On-going       | Solid Waste Dept      | a through i                  | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Disposal locations, requirements, and availability for HHW and                                                                                                                                                                              | X               | X       | X        | X    | On-going    | On-going       | Solid Waste Dept      | a through i                  |                                                          |                              |
|                                                                                 |              | Motor vehicle fluids                                                                                                                                                                                                                        | X               | X       | X        |      | On-going    | On-going       | Solid Waste Dept      | b, c                         |                                                          |                              |
|                                                                                 |              | Travel trailer sanitary wastes                                                                                                                                                                                                              | X               |         |          |      | On-going    | On-going       | BCACWP                | b, c                         |                                                          |                              |
|                                                                                 |              | Recreational boating sanitary wastes                                                                                                                                                                                                        | X               |         |          |      | 2010        | 2011           | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Yard wastes                                                                                                                                                                                                                                 | X               | X       |          |      | On-going    | On-going       | MS4 Permittees        | a through i                  |                                                          |                              |
| Septic System Maintenance                                                       | H            | Proper septic system care and maintenance                                                                                                                                                                                                   | X               | X       |          |      | On-going    | On-going       | BCACWP                | b                            | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Identification of failing septic systems                                                                                                                                                                                                    | X               | X       |          |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Water quality impacts associated with failing septic systems                                                                                                                                                                                | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
| Benefits Green Infrastructure (GI) and Low Impact Development (LID)             | M            | Benefits of native vegetation as a vegetated riparian buffer or rain garden for: stream health, infiltration, improving water quality, improving wildlife habitat, helping to reduce invasive nuisance species, reducing the cost of mowing | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | b, c                         | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              |                                                                                                                                                                                                                                             |                 |         |          |      |             |                |                       |                              |                                                          |                              |
|                                                                                 |              |                                                                                                                                                                                                                                             |                 |         |          |      |             |                |                       |                              |                                                          |                              |
| Management of riparian lands                                                    | L            | Importance of riparian corridors, wetlands, & flood plains                                                                                                                                                                                  | X               |         | X        | X    | 2011        | 2012           | BCACWP                | b                            | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | BMPs for riparian lands:                                                                                                                                                                                                                    |                 |         |          |      |             |                |                       |                              |                                                          |                              |
|                                                                                 |              | Protection through use of conservation easements                                                                                                                                                                                            | X               | X       |          |      | On-going    | On-going       | Conservation District | b                            |                                                          |                              |
|                                                                                 |              | Lawn maintenance for water quality                                                                                                                                                                                                          | X               | X       | X        |      | On-going    | On-going       | BCACWP                | a, b, i, m                   |                                                          |                              |
|                                                                                 |              | Landscaping for water quality                                                                                                                                                                                                               | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b, c                         |                                                          |                              |
|                                                                                 |              | Shoreline stabilization techniques                                                                                                                                                                                                          | X               | X       | X        |      | On-going    | On-going       | Conservation District | b                            |                                                          |                              |
|                                                                                 |              | Proper management of grass clippings, leaf litter, and animal wastes                                                                                                                                                                        | X               | X       | X        |      | On-going    | On-going       | BCACWP                | a through i                  |                                                          |                              |
| Entity Specific Pollutant - Phosphorus                                          |              | Affect of storm water pollution on the Kalamazoo River Watershed                                                                                                                                                                            | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through m                  | 35% of area population to gain knowledge of key messages | Social survey 1/permit cycle |
|                                                                                 |              | Car, pavement, and/or power washing (preferred cleaning materials and practices, including phosphate fee)                                                                                                                                   | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | b, c                         |                                                          |                              |
|                                                                                 |              | Pesticide use, fertilizer use, and their disposal                                                                                                                                                                                           | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Proper management of grass clippings, leaf litter, and animal wastes                                                                                                                                                                        | X               | X       | X        | X    | On-going    | On-going       | BCACWP                | a through i                  |                                                          |                              |
|                                                                                 |              | Proper disposal of wash water, grease traps, etc.                                                                                                                                                                                           | X               | X       | X        |      | 2010        | 2011           | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Water quality impacts associated with failing septic systems                                                                                                                                                                                | X               | X       | X        |      | On-going    | On-going       | BCACWP                | b                            |                                                          |                              |
|                                                                                 |              | Lawn maintenance for water quality                                                                                                                                                                                                          | X               | X       | X        |      | On-going    | On-going       | BCACWP                | a, b, i, m                   |                                                          |                              |
|                                                                                 |              |                                                                                                                                                                                                                                             |                 |         |          |      |             |                |                       |                              |                                                          |                              |

## Public Education Delivery Mechanism

| Public Education Plan - Delivery Mechanism Table for the Battle Creek Area Clean Water Partners |                                                                                                                                                                                                                                                   |                                                                                                          |                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Delivery Mechanism                                                                              | Description                                                                                                                                                                                                                                       | Method for Evaluating Delivery Mechanism                                                                 | Measurable Goals                                                                                                                                                             |
| a - Brochures                                                                                   | Individual brochures and flyers, which discuss a number of topics, such as watersheds, stormwater, the 24-Hour Pollution Hotline, soil erosion, and lawn care.                                                                                    | Tally brochure distribution and list locations                                                           | At least 200 at public events, such as Krazy for the Kazoo. Brochures will be available at municipal and nested jurisdiction buildings.                                      |
| b - www.bowater.org website                                                                     | The purpose of the website is to provide information about local water issues to the public via the internet.                                                                                                                                     | Statistical analysis of website usage per year.                                                          | 60 visitors per year based on statistical analysis.                                                                                                                          |
| c - Mass media                                                                                  |                                                                                                                                                                                                                                                   |                                                                                                          |                                                                                                                                                                              |
| 1 - Print media                                                                                 | Event specific and project specific presence in the local media, including press releases, Letters to the Editor, and articles.                                                                                                                   | Event-specific surveys to determine how people learned about the event                                   | At least one article, Letter to the Editor or TV-radio spot for the following: Super Soils Test Saturday, Children's Water Festival, Global Citizens River Conservation Day. |
| 2 - Radio                                                                                       | 30-second monthly radio public service announcements (PSA). See message calendar below.                                                                                                                                                           | Event-specific surveys to determine how people learned about the event                                   | At least one PSA per month per year.                                                                                                                                         |
| d - Social Marketing                                                                            | Presence on social marketing sites.                                                                                                                                                                                                               | Track number of social marketing likes                                                                   | Presence on at least one social marketing site.                                                                                                                              |
| e - Presentation to area groups                                                                 | Presentation made to groups such as service groups, church groups, lake associations, and school groups about                                                                                                                                     | Track the number of presentations given to area groups per year.                                         | Two presentations per year.                                                                                                                                                  |
| f - Displays at community events                                                                | Informational displays at events. Informational displays consist of display boards with pictures and attention grabbing facts.                                                                                                                    | Track the number of displays per year.                                                                   | One display at two community events per year.                                                                                                                                |
| g - Static displays                                                                             | Water quality static displays at locations such as, Willard Library and/or at the Lakeview Square Mall.                                                                                                                                           | Track the number of displays per year.                                                                   | One display at one location per two years.                                                                                                                                   |
| h - Bill inserts and community newsletters                                                      | Water quality information in bill inserts and/or community newsletters.                                                                                                                                                                           | Track the number of website hits. Event-specific surveys to determine how people learned about the event | Information in one bill insert and/or community newsletters per year.                                                                                                        |
| i - Wall Calendar                                                                               | Wall calendar with local, watershed pictures, water quality messages, and environmental events.                                                                                                                                                   | Event-specific surveys to determine how people learned about the event                                   | Calendar once every two years.                                                                                                                                               |
| j - Children's Water Festival                                                                   | Children's Water Festival- Area fourth and fifth grade students are invited to attend a festival pertaining to water resource protection at Kellogg Community College. Students have two, hands-on presentations and see an environmental singer. | Track the number of students and teachers participating in the event.                                    | At least 500 students and teachers participating per year.                                                                                                                   |
| k - Krazy for the Kazoo River Conservation Day                                                  | Krazy for the Kazoo is a watershed-wide event that includes trash pickup, tire removal, invasive species removal, planting of native species, tree planting, birdhouse installation, and brush removal.                                           | Track the number of volunteers participating in the event.                                               | At least 150 volunteers per year.                                                                                                                                            |
| l - Kanoe the Kazoo                                                                             | Kanoe the Kazoo is a watershed-wide canoeing and kayaking event meant to promote the use of the waterways within the Kalamazoo River Watershed. Public education is a component of the event.                                                     | Track the number of participant in the event.                                                            | At least 30 participants per year.                                                                                                                                           |
| m - Internet map showing subwatershed drainage corresponding to neighborhoods                   | A map of the Battle Creek Area Clean Water Partner's Watershed Management Area on the internet which shows the subwatershed a property is located in.                                                                                             | Statistical analysis of website usage per year.                                                          | 60 visitors per year based on statistical analysis.                                                                                                                          |

## Monthly Message Calendar

| Month    | Message                                                                                                | Month     | Message                                                                          |
|----------|--------------------------------------------------------------------------------------------------------|-----------|----------------------------------------------------------------------------------|
| January  | Watershed Message & Groundwater Protection (GWP)                                                       | July      | Irrigation; Grass Clippings; Car Washing                                         |
| February | Watershed Message & GWP; Household Hazardous Waste (HHW)                                               | August    | Overall Fertilizer Message; Grass Clippings; River Cleanup; Travel Trailer Waste |
| March    | Groundwater Awareness Week                                                                             | September | Leaves & Grass in the Catch Basin; River Cleanup; GWP; Kanoe The Kazoo           |
| April    | Overall Fertilizer Message; GWP                                                                        | October   | Leaves & Grass in the Catch Basin; Fertilizer Message; GWP                       |
| May      | Overall Fertilizer Message; Grass Clippings; Water Quality Awareness Month; GWP; Kanoe the Kazoo (KTK) | November  | Leaves in the Catch Basin; Fertilizer Message; GWP                               |
| June     | Overall Fertilizer Message; Grass Clippings; KTK; Pet Waste                                            | December  | Watershed Message & Groundwater Protection (GWP)                                 |

# Illicit Discharge Elimination Plan (IDEP)

## ***Introduction***

The purpose of the City of Springfield Illicit Discharge Elimination Plan (IDEP) is to prohibit and eliminate illicit discharges and connections, including discharges of sanitary wastewater to the City of Springfield municipal separate storm sewer system (MS4). The separate storm sewer system includes both open and enclosed drainage systems that are owned or operated by the City of Springfield and discharge to a surface water of the State or to a separate storm water drainage system operated by another public agency.

## ***Definitions***

The following definitions will assist in understanding the intent of this IDEP

**Illicit discharge** means any discharge to, or seepage into, a separate storm sewer that is not composed entirely of storm water or uncontaminated groundwater except discharges pursuant to an NPDES permit. Illicit discharges include non-storm water discharges through pipes or other physical connections; the dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or leaf litter; the collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

**Illicit connection** – A physical connection to the MS4 that primarily conveys non-storm water discharges other than uncontaminated groundwater into the MS4; or a physical connection not authorized or permitted by the local authority (where a local authority requires such authorization or permit)

**Point source** means a discharge point from an MS4 to the surface waters of the state, or a point where an MS4 discharges into a system operated by another entity.

## **LEGAL AUTHORITY**

The City of Springfield references the City of Battle Creek's water and sewer ordinance, Chapter 1040, because Springfield contracts with the City of Battle Creek for water and sewer services. The City of Springfield's Chapter 48 of the Code of Ordinances specifies the mandatory connection to the sanitary sewer system. Chapter 48 also gives the Director of Public Works authority to enter and inspect facilities and dwellings for compliance with the chapter.

## ***Finding and Eliminating Illicit Connections and Discharges***

### **1. Storm sewer system map**

The City of Springfield has maps of its storm sewer system available at the Department of Public Works.

### **2. Prioritizing areas for dry-weather screening**

Dry-weather screening will be prioritized in the following way (from highest to lowest). The prioritization is based on previous IDEP investigations:

- 1) Areas with older sewer lines or with a history of sewer overflows or cross-connections
- 2) Areas with sewer conversions or historic combined sewer systems
- 3) Areas with older infrastructure
- 4) Industrial, commercial, or mixed-use areas
- 5) Areas with a history of past illicit discharges
- 6) Areas with a history of illegal dumping
- 7) Areas with poor dry-weather water quality
- 8) Areas with septic systems
- 9) Areas with water quality impacts, including waterbodies identified in a Total Maximum Daily Load Type of commercial activity
- 10) Other potential pollutant generating sites

## **IDEP prioritized geographical areas**

The City of Springfield has a small system with approximately fifteen outfalls. The City begins the screening of its outfalls based on their proximity to the Kalamazoo River. River outfalls are screened first and then screening progresses from the northeast part of town toward the southwest.

## CITY OF SPRINGFIELD

### Municipal Separate Storm Sewer System Outfall Inventory

| Outfall ID  | Receiving Water | Location              | MS4-MS4 Connection |
|-------------|-----------------|-----------------------|--------------------|
| HB_LB-001   | Helmer Brook    | Tecumseh Road         |                    |
| HB_RB_002   | Helmer Brook    | Tecumseh Road         |                    |
| HB_RB_003   | Helmer Brook    | Evergreen Road        |                    |
| HB_RB_008   | Helmer Brook    | Beaver Dam Road       |                    |
| HB_RB_009   | Helmer Brook    | Harmonia Road         |                    |
| HB_RB_010   | Helmer Brook    | New Moon Terrace Road |                    |
| HB_RB_011   | Helmer Brook    | New Moon Terrace Road |                    |
| HB_RB_012   | Helmer Brook    | Helmer Road           |                    |
| KZ00_LB_013 | Kalamazoo River | Lafayette Avenue      |                    |
| KZ00_LB_014 | Kalamazoo River | Lafayette Avenue      |                    |
| KZ00_LB_015 | Kalamazoo River | 16th Street           |                    |
| LL_N_016    | Lawrence Lake   | Evergreen Road        |                    |
| WL_RB_004   | West Lake       | West Lake Woods Drive |                    |
| WL_RB_005   | West Lake       | West Lake Woods Drive |                    |
| WL_RB_006   | West Lake       | West Lake Woods Drive |                    |
| WL_N_007    | West Lake       | Beaver Dam Road       |                    |
| CBC_014     | Kalamazoo River | Lafayette Avenue      | yes                |

### 3. Performing dry-weather screening

The City of Springfield Illicit Discharge Elimination Program Standard Operating Procedure (SOP) details the process followed for performing dry-weather screening. The SOP can be found in Appendix A.

Outfalls will be screened on a once-per-five-year cycle based on the priority outlined above. Dry weather screening will be performed after at least 48 hours of any precipitation. Observations will be recorded on the field logs developed for the program. Field staff will note any unusual conditions, such as the presence/absence of flow, changes in water clarity, color, and odor; the presence of suds, oil sheens, sewage, floatable materials, bacterial sheens, algae, and slimes; and the staining of the banks or unusual vegetative growth. In addition, staff will also investigate undocumented connections and the integrity of the discharge structure.

If flow is observed from an MS4 discharge point, the following action will be taken:

| Source      | Action                      | Analysis/Sampling Required                                      |
|-------------|-----------------------------|-----------------------------------------------------------------|
| Obvious     | Eliminate illicit discharge | None                                                            |
| Not Obvious | Conduct field assessment    | pH, ammonia, surfactants, and temperature using field test kits |

#### 4. Illicit discharge source identification

If an illicit discharge is detected and the source is not obvious, the City will conduct a further investigation. The City will use any of the following methods:

- Upstream manhole investigation
- Indicator parameter testing
- Video testing
- Dye testing
- Smoke testing
- Drainage area investigations
- Documented visual observation or physical indicators
- Homeowner surveys and surface condition inspections for on-site sewage disposal systems

#### 5. Eliminating illicit discharges and pursuing enforcement action

##### Prioritization of illicit discharges

The prioritization schedule detailed below will be implemented to eliminate confirmed illicit discharges. For regular screening purposes, priority will be given to outfalls with a previous history of illicit activity and those located near public sanitary and storm sewer.

| Conditions-highest to lowest priority                                                                |
|------------------------------------------------------------------------------------------------------|
| Dry Weather Significant Illicit Discharges-untreated or partially treated human sewage               |
| Dry Weather Significant Illicit Discharges–non sewage related, but meets 24-hr notification criteria |
| Dry Weather Significant Illicit Discharges-does not meet 24-hour notification criteria               |
| Dry Weather Non-Significant Illicit Discharges                                                       |
| Wet Weather Illicit Discharges                                                                       |

#### *Enforcement Response Procedure*

Current City code prohibits sanitary connections and non-storm water to its MS4 system and gives the City authority to remove illegal connections and, if necessary, eliminate access to the system. The table below outlines the procedure for eliminating illicit discharges, including enforcement actions.

| Discharge Type                              | Contact List                                                                                                                                               | Response                                                                                                                                                                                                                                                       | Enforcement Type             | Enforcement Action                                                                                                                                                                                                                                                                     | Elimination Status                               |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Sanitary sewage from failing infrastructure | <ul style="list-style-type: none"><li>• Dispatch</li><li>• Contact City of Battle Creek Wastewater Treatment Plant (WWTP)</li><li>• DPW Director</li></ul> | <ul style="list-style-type: none"><li>• City will confirm source</li><li>• Correct problem w/i 48 hours</li><li>• Notify EGLE w/i 24 hours of confirmation</li><li>• Violation recorded on the Environmental Response Procedure (ERP) Reporting Form</li></ul> | City Ordinance, Chapter 48   | <ul style="list-style-type: none"><li>• If verbal communication does not correct problem within 48 hours, Springfield will hire a contractor to eliminate the problem and the cost shall be borne by the responsible party. A violation letter will be sent notifying owner.</li></ul> | Discharge permanently ceased, with date recorded |
| Illicit sanitary connection                 | <ul style="list-style-type: none"><li>• Contact City of Battle Creek Wastewater Treatment Plant (WWTP)</li><li>• DPW Director</li></ul>                    | <ul style="list-style-type: none"><li>• City will confirm source</li><li>• Correct problem</li><li>• Notify EGLE w/in 24 hours of confirmation</li></ul>                                                                                                       | City Ordinance, Chapter 1048 | <ul style="list-style-type: none"><li>• Violation letter issued allowing for a period of corrective action, if verbal communication</li></ul>                                                                                                                                          | Discharge permanently ceased, with date recorded |

|                               |                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                  |                                                           |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                     |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>Violation recorded on the Environmental Response Reporting (ERP) Form</li> </ul>                                                                                                                                                                                          |                                                           | <p>does not correct problem within 72 hours.</p> <ul style="list-style-type: none"> <li>If no action occurs, Springfield will hire a contractor to eliminate the problem and the cost shall be borne by responsible party.</li> </ul>                                                                                                                    |                                                                                                                                     |
| Failing Septic System         | Health Department                                                                                                                                                                        | <ul style="list-style-type: none"> <li>Contact the Calhoun County Health Department (CCHD)</li> <li>Violation recorded on the Environmental Response Reporting (ERP) Form</li> </ul>                                                                                                                             | Violation of public health code                           | <ul style="list-style-type: none"> <li>CCHD to follow their enforcement procedure for failing septic systems per County ordinance.</li> </ul>                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Follow up with Health Department</li> <li>Discharge terminated with date recorded</li> </ul> |
| Large quantity spill          | <ul style="list-style-type: none"> <li>Dispatch</li> <li>EGLE PEAS</li> <li>DPW Director</li> </ul>                                                                                      | <ul style="list-style-type: none"> <li>Contact first responders</li> <li>Control issue</li> <li>Clean-up problem</li> <li>Review environmental impacts</li> <li>EGLE PEAS</li> <li>Violation recorded on the Environmental Response Procedure (ERP) Reporting Form</li> </ul>                                    | City Ordinance, Chapter 1048                              | Violation notice issued and spill response charged to violator                                                                                                                                                                                                                                                                                           | Discharge terminated, with date recorded                                                                                            |
| Soil erosion measures failing | <ul style="list-style-type: none"> <li>County Soil Erosion &amp; Sedimentation Control (SESC) agent</li> <li>Responsible party, contractor or DPW staff</li> </ul>                       | <ul style="list-style-type: none"> <li>Confirm source</li> <li>Contact contractor or DPW staff conducting project</li> <li>Contact SESC agent</li> <li>Correct problem</li> </ul>                                                                                                                                | <ul style="list-style-type: none"> <li>Part 91</li> </ul> | <ul style="list-style-type: none"> <li>Soil Erosion &amp; Sedimentation Control Ordinance.</li> <li>If no action occurs, Springfield will hire a contractor to eliminate the problem and the cost shall be borne by responsible party for a contractor-run project.</li> <li>City-run project, staff will be mandated to correct the problem.</li> </ul> | Discharge terminated, with date recorded                                                                                            |
| Illegal dumping               | <ul style="list-style-type: none"> <li>Local law enforcement agency depending on severity</li> <li>EGLE PEAS depending on severity and materials dumped</li> <li>DPW Director</li> </ul> | <ul style="list-style-type: none"> <li>Investigate source</li> <li>Contact source, if known</li> <li>Contact law enforcement agency, depending on severity</li> <li>Contact EGLE PEAS, depending on severity</li> <li>Violation recorded on the Environmental Response Procedure (ERP) Reporting Form</li> </ul> | City Ordinance Chapter 36                                 | <ul style="list-style-type: none"> <li>Written violation and ticket if deemed necessary by local law enforcement</li> <li>Clean up required by violator</li> </ul>                                                                                                                                                                                       | Discharge terminated, with date recorded                                                                                            |

Appendix B contains an example of the Enforcement Response Procedure Reporting Form.

## ***Training Staff***

Training will be given to existing staff who are involved in illicit discharge-related activities or who have field positions with the potential for witnessing illicit discharges and connections on a once-per-year cycle. New staff will be trained within the first year of hire.

The training will include:

- The definition of illicit discharges and connections
- Techniques for finding illicit discharges, including field screening, source identification, and recognizing illicit discharges and connections
- Methods for eliminating illicit discharges and the proper enforcement response
- Techniques for sampling, analyzing, and recording information
- Recognition of naturally occurring phenomena and their sources (bacteria sheens, slimes, and films; bryozoans, pollen, blue-green algae, green algae, tannins, and foams)

| IDEP TRAINING SCHEDULE    |                    |                          |
|---------------------------|--------------------|--------------------------|
| Employees                 | Scheduled Training | Frequency                |
| Director of Public Works  | 2027               | 1per 5 year permit cycle |
| DPW Supervisor            | 2027               | 1per 5 year permit cycle |
| City of Springfield Staff | 2027               | 1per 5 year permit cycle |

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

The Illicit Discharge Elimination Program will be evaluated by using the following:

- City of Springfield outfalls will be screened once per five-year cycle. Annual reports will include information on screening activities, such as the number visited. In addition, reports will include an assessment of the screening activities to determine if the appropriate number of outfalls was visited per reporting period. In addition, the prioritization of the investigation will be assessed as well as the detection methods.
- The number of illicit discharges/connections identified versus the number eliminated will be reported in annual reports. Also, difficulties in identifying, correcting illicit discharges/connections, and any enforcement issues will be contained in reports.
- Annual reports will contain information on any complaints by the public regarding illicit discharges. Citizen complaints will be compared with dry weather screening.
- The frequency of staff training will also be assessed during the permit period.

## ***Progress Reporting***

The City of Springfield will document actions taken to eliminate illicit discharges and connections. Progress reports will summarize the total estimated volume and pollutant load eliminated for the main pollutants of concern, and the locations of the discharges into both the CCWRC's MS4 and the receiving water.

## ***Recordkeeping***

The City of Springfield will keep records of:

- IDEP investigations and field logs
- Records of actions taken to eliminate illicit discharges
- Records of total estimated volume and pollutant loads eliminated
- Employee training records

## Construction Storm Water Runoff Control Program

The Calhoun County Road Department (CCRD) administers the County's Soil Erosion and Sedimentation Control (SESC) program. To ensure adequate protection of the MS4, the City of Springfield has developed and is implementing the following:

- a) If pollutants are discharged from construction activity, the Calhoun County SESC administrator is contacted. The County has the responsibility of contacting EGLE depending on the severity and magnitude of the discharge.
- b) If the discharge is from a City-run project, the City will contact the contractor to correct the problem.
- c) If the discharge is a non-construction discharge from the construction site, an investigation into the source of the discharge will be conducted by the City. EGLE will be contacted, if warranted.
- d) The City of Springfield alerts those submitting development plans for site plan review that an SESC permit will need to be obtained for all sites within 500 feet of a lake, stream, or county drain; or if a site disturbs more than one acre of land. Springfield also specifies that one cannot obtain a building permit unless qualifying sites have obtained an SESC permit.
- e) The Battle Creek Area Clean Water Partners, of which the City of Springfield is a member, directs the public to report illicit discharges into the MS4 by calling the non-emergency 911 number. Any pertinent reports of pollution into the MS4 are referred to the appropriate office in the County.
- f) Any reports of pollution into the MS4 via the Battle Creek Clean Water Partner's website are also tracked and are directed to the appropriate office in the County.

In addition, calls into the City office about construction activity discharges are tracked on the drain complaint log.

- g) The City notifies landowners or easement holders of the property where construction activity will occur by mail.

## **Post Construction Storm Water Control for New Development and Redevelopment Projects**

The City of Springfield submitted a resolution that references the City of Battle Creek's storm water ordinance and Technical Reference Manual (TRM) as a part of its storm water permit application. The ordinance and TRM need to be updated to address current post construction storm water requirements. The latest version was updated in May 2020.

# Pollution Prevention and Good Housekeeping Activities for Municipal Operations

## Introduction

The City of Springfield outlines specific actions and implementation schedules for pollution prevention and good housekeeping activities (P2/GH) to minimize pollutant runoff to the maximum extent practicable from its operations that have the potential to discharge storm water to surface waters of the state.

## Definitions

The following definitions will assist in understanding the intent of P2/GH measures.

**Fleet:** A group of vehicles owned or operated as a unit.

**Maintenance (includes, but not limited to):** adding/changing vehicle fluids, fueling, lubrication, painting, mechanical repairs, parts degreasing, and vehicle/equipment washing.

**Storage Yard (includes, but not limited to):** areas where vehicles are stored longer than overnight/weekend; areas where road maintenance materials are stored; areas where vehicle maintenance materials are stored; areas where chemicals in bulk are stored; areas where catch basin cleaning wastes are stored; and areas where maintenance equipment such as mowers, tractors, vactor trucks, and sweepers are stored.

## Municipal Facility and Structural Storm Water Control Inventory

The City of Springfield owns municipal properties and owns and maintains a variety of structural Storm Water controls. Below is a summary of the facilities and structural Storm Water controls owned or operated by the City. Updating and revising the inventory is 30 days following the adding or removing of a facility or structural Storm Water control.

### Facility-Specific Storm Water Management

Facilities are assessed for the potential to discharge pollutants to surface water of the state. The following factors are considered:

- Amount of urban pollutants stored at the site
- Identification of improperly stored materials
- The potential for polluting activities to be conducted outside
- Proximity to waterbodies
- Poor housekeeping practices
- Discharge of pollutants of concern to impaired waters

Updating and revising the assessment is 30 days prior to discharging storm water from a new facility and within 30 days of determining a need to update/revise the facility assessment.

| Facility          | Address                       | Potential to Discharge Pollutants to Surface Water | Potential Pollutant Activities                         | Prioritized Facilities |
|-------------------|-------------------------------|----------------------------------------------------|--------------------------------------------------------|------------------------|
| City Hall         | 601 Avenue A, 49037           | MS4 discharge                                      | Parking lot runoff                                     | Low                    |
| Police Department | 601 Avenue A, 49037           | MS4 discharge                                      | Parking lot runoff                                     | Low                    |
| DPW Building      | 601 Avenue A, 49037           | No direct surface water discharge                  | Periodic fleet maintenance and storage yard activities | Medium                 |
| Begg Park         | 550 Military Boulevard, 49037 | No MS4 in place                                    | N/A                                                    | N/A                    |

|                |                                  |                 |     |     |
|----------------|----------------------------------|-----------------|-----|-----|
| Hinton Park    | N 27 <sup>th</sup> Street, 49037 | No MS4 in place | N/A | N/A |
| Rothchild Park | 600 N. Helmer, 49037             | No MS4 in place | N/A | N/A |
| Upton Park     | 820 Upton Ave, 49037             | No MS4 in place | N/A | N/A |
| Reese Cemetery | Dickman Road, 49037              | No MS4 in place | N/A | N/A |

**City Hall/Police Department Buildings:**

- Snow removal and deicing operations are performed by DPW staff and snow is stored on grassy areas to minimize runoff.
- Pavement maintenance operations such as sealing, saw cutting, and tack coating for new pavement placement are contracted by the City.
- Property grounds maintenance is conducted by DPW staff during the growing season. Staff is instructed to sweep clippings and leaves onto lawn areas.
- Pesticide and herbicide use by a certified pesticide applicator only occurs when vegetation cannot be handled by mowing and area poses a traffic hazard. Fertilizer use is only for the establishment of new turf.
- Small quantities of chemicals for facility maintenance are stored indoors away from storm drains.
- Trash receptacles are placed where the discharge of contaminants to surface water is unlikely. Dumpsters are maintained to minimize impact to the storm sewer system. Lids are kept closed.

**DPW Building:**

- No pesticide, herbicide, or fertilizer use by the City of Springfield.
- City vehicles are washed at the DPW facility.
- The DPW garage uses a variety of chemicals, such as motor oil, transmission fluid, antifreeze, and hydraulic fluid, on an as needed basis. Chemicals have secondary containment.
- Spill kit is located at the DPW facility.
- Vehicle fueling occurs at a commercial facility, Pacific Pride. All employees are instructed to stay by and monitor their vehicles when refueling.
- City vehicles are routinely inspected at the DPW facility. Vehicles are equipped with daily operator logs.

**STRUCTURAL STORM WATER CONTROL OPERATION AND MAINTENANCE**

|                                        |                               |
|----------------------------------------|-------------------------------|
| 30 <sup>th</sup> Street retention pond | Betterly Road detention pond  |
| Avenue A detention pond                | Beech and Rich detention pond |
| Upton Park detention pond              |                               |

**Catch Basin Maintenance/Inspection Procedure:**

The City has at least 200 catch basins in the storm sewer system. The City will continue to add catch basins into the Geographical Information System (GIS) as a contract with the City of Battle Creek. Surface cleaning is performed by DPW staff based on priority flood areas. Catch basins are inspected once per two years, at a minimum. Catch basins in low areas are the highest priority. The priority areas are Avenue C at the intersections of 20<sup>th</sup> and 24<sup>th</sup> Streets, 24<sup>th</sup> Street between Richfield and Frisbie, and Goguac Street between 27<sup>th</sup> and 28<sup>th</sup> Streets. The remaining areas are checked on a rotational basis and are rain dependent.

DPW staff repairs damaged catch basins. Catch basins are also inspected when reported through IDEP investigations, functional problems, and citizen complaints.

If surface cleaning is insufficient, tag-a-long vacuators and street sweepers with vacuuming are used to remove debris and water. If vacuuming needs are sizable, the City of Springfield contracts the work. Pumped water from catch basin cleaning is disposed of at a wastewater treatment plant. Solids are hauled to a landfill. Known or suspected hazardous materials in catch basins are referred to the Springfield of Battle Creek's HazMat Team.

The amount of sediment collected, the location, and the frequency of storm water devices being cleaned is tracked.

#### **Additional Storm Water Controls Inspection/Maintenance Procedures:**

Below are the inspection and maintenance procedures for additional storm water structural controls. Updating and revising the procedure is 30 days following the implementation of a new structural storm water control.

##### **Detention Basins:**

Basins are mowed biweekly during the growing season and are inspected several times per year. Minor erosion or infrastructure wear or damage is repaired by the Public Works Department. For significant erosion or infrastructure wear or damage, the City will hire a contractor to conduct the repair. Any solids that may be removed are hauled to a landfill. Known or suspected hazardous materials in catch basins are referred to the Springfield of Battle Creek's HazMat Team.

### ***Municipal Operations And Maintenance Activities***

The information below pertains to municipal operations and maintenance activities performed by the City of Springfield. Updating and revising the assessment is 30 days following adding or removing BMPs to address new and existing operation and maintenance activities.

#### **Roadways, Parking Lots, and Bridges**

The City of Springfield attempts to construct, operate, and maintain its streets, roads, highways, parking lots, and other City-owned impervious infrastructure according to the City of Battle Creek storm water ordinance, Chapter 1048, to reduce the discharge of pollutants into the MS4 and the surface waters of the state, including pollutants resulting from snow removal practices.

##### **Roadway / Parking lot maintenance:**

Resurfacing/pothole patching: When the City maintains roads by either patching potholes or by resurfacing, storm drains and manholes are covered during operation, if necessary.

Snow Removal Procedure: The City of Springfield plows snow and piles it in plowed areas. It does not remove snow to any areas.

##### **Roadside vegetation:**

Mowing is the primary way that roadside vegetation is maintained

#### **Street Sweeping**

The sweeping schedule begins with major roads and proceeds to smaller roads. Streets are swept three to four times per year. Sweeping is begun before the snow melts if the weather is above freezing. Sweepers are routinely maintained through DPW. Updating and revising the prioritization is 30 days following the construction of a new street, parking lot, or other owned or operated impervious surface or within 30 days of identifying a need to revise the priority level.

Street Sweeping Waste: Street sweeping waste is taken to the C&C Landfill and solid waste manifest are completed and retained on site.

#### **Managing Vegetated Properties**

The City of Springfield does not fertilize or apply pesticides/herbicides on city campuses and does not have licensed pesticide/herbicide operators on staff.

## Contractor Requirements and Oversight

Contractors hired to perform municipal operations and maintenance activities are expected to comply with pollution prevention and good housekeeping BMPs. The required trainings and maintenance activities are listed on Page 5 of the City of Battle Creek Stormwater Management Plan.

## *Employee Training*

Training will be given to existing staff who are involved in the municipal operations outlined above on a once per five-year cycle. New staff will be trained within the first year of hire. Specific training for contractors will be done prior to work being performed.

The training topics will include the effects of pollutants on water quality entering the MS4, such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, storm water system maintenance, and any other activities as specified in the permit. The City will work collaboratively to develop common training materials for employees of the area.

- For existing employees, one (1) training session prior to the expiration of this permit
- For new employees, one (1) training session during the first year of employment
- For contractors, the permittee shall ensure that they are trained before they perform the contract work. The City of Springfield will include storm water control requirements in bid specifications.

| Employees         | Frequency                                        |
|-------------------|--------------------------------------------------|
| Existing Staff    | 1per 5-year permit cycle                         |
| Newly Hired Staff | Within the first year of hire                    |
| Seasonal          | Annual                                           |
| Contractors       | As needed and before contract work is performed. |

## Total Maximum Daily Load - Total Phosphorus

Total Phosphorus Monitoring for the Lake Allegan/Kalamazoo River Watershed Total Maximum Daily Load (TMDL) within the Greater Battle Creek Area

The Greater Battle Creek Area is located within the Kalamazoo River Watershed, which has a phosphorus TMDL. The MS4 permitted agencies of the Battle Creek Area Clean Water Partners, comprised of the City of Battle Creek, the City of Springfield, and the Calhoun County Water Resources Commissioner, worked collaboratively to develop an elective option monitoring program for the Greater Battle Creek Area. The Partners also consulted with a representative from Michigan State University's Kellogg Biological Station who conducted a two-year doctoral study of phosphorus inputs within the Kalamazoo River Watershed. In addition, routine, in-stream monitoring has not been done on a consistent basis within the Greater Battle Creek area. Based on the previous study and the lack of baseline stream data, the Partners will implement an annual in-stream monitoring program beginning April 2016. The monitoring program is comprised of the following elements:

Six grab samples will be taken at six separate locations once per month from April through September. Discharge estimates from gage rating curves will also be recorded. The samples will be collected on a routine basis, such as the second Tuesday of the month.

The sampling period of April through September was selected because of the TMDL Implementation Plan elements. Point sources voluntarily lower their phosphorus waste load allocation during that time, which is the critical growing period of the year.

The selection of the six sample points is based on their location within the Greater Battle Creek Area (see enclosed map). The intention is to examine a reach of the Battle Creek River before the confluence with the Kalamazoo River, to examine a reach of the Kalamazoo River before the confluence with the Battle Creek River, and to examine the Kalamazoo River after the confluence.

The Battle Creek River sample points will be at the Emmett Street Bridge, the upstream location, and at the Jackson Street Bridge, the downstream location. This reach will capture 52 Storm Water outfalls.

The pre-confluence Kalamazoo River sample points will be taken at 12 Mile Road, the upstream location of the urbanized area, and at McCamly Street on the Kalamazoo River, the downstream location. This reach captures 29 Storm Water outfalls.

The post-confluence Kalamazoo River sample points will be taken at the Kendall Street Bridge and at the Helmer Street Bridge, further downstream on the Kalamazoo River. This reach will capture 42 Storm Water outfalls.

The six samples will be monitored for temperature, dissolved oxygen (DO), pH, dissolved phosphorus, particulate phosphorus, and total phosphorus. Temperature, DO, and pH will be field measurements. The samples will be taken and analyzed by the City of Battle Creek's Wastewater Treatment Plant Laboratory staff. All results will be recorded and submitted with MS4 permittee progress reports.

The results of the monitoring program will be used to determine which activities need to be implemented to comply with the phosphorus TMDL requirements. These activities will be reported in progress report, with implementation targeted during the five-year permit cycle. Additional actions intended to make progress toward the reduction of phosphorus in post-construction control measures, pollution prevention and good housekeeping, and public education activities will also be assessed.

## SWMP Summary Table

| Action                                                                                  | Description/Method of Implementation                                                                                                                                                                           | Schedule                                                                                                | Evaluation Methods                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>PUBLIC EDUCATION PLAN (PEP) - SEE PEP TABLE FOR SPECIFIC ACTIONS</b>                 |                                                                                                                                                                                                                |                                                                                                         |                                                                                                                                                                                               |
| <b>ILLICIT DISCHARGE ELIMINATION PLAN (IDEP)</b>                                        |                                                                                                                                                                                                                |                                                                                                         |                                                                                                                                                                                               |
| Storm sewer map                                                                         | Incorporate MS4 data into GIS system.                                                                                                                                                                          | Complete by October 16, 2016                                                                            | Evaluate the level of confidence of updated map.                                                                                                                                              |
| Dry-weather screening                                                                   | Screen outfalls once/five years after at 48 hours of dry weather.                                                                                                                                              | Ongoing                                                                                                 | Report on the number of outfalls screened. Evaluate efficiency of the program and the number of illicit connections found. The method of correcting illicit discharges will also be assessed. |
| Employee training                                                                       | DVD, off-site workshop, in house training, new employee orientation                                                                                                                                            | Existing employees-1 training per permit cycle. New employees-1 training session 1st year of employment | Retain documentation from training, number of employees trained.                                                                                                                              |
| Contractor training                                                                     | Provide Training Materials/Information in bid documents and/or preconstruction meetings.                                                                                                                       | As needed when new contractors are hired.                                                               | Retain documentation from training, track number of contractors trained.                                                                                                                      |
| <b>POST CONSTRUCTION STORM WATER CONTROL FOR NEW &amp; REDEVELOPMENT PROJECTS</b>       |                                                                                                                                                                                                                |                                                                                                         |                                                                                                                                                                                               |
| Storm water ordinance and design manual                                                 | Reference updated existing storm water ordinance and technical reference design manual (TRM) to include channel protection criteria.                                                                           | In place by October 1, 2016                                                                             | Track number of low impact development installations through the Site Plan Review process.                                                                                                    |
| Maintenance agreement                                                                   | Implement maintenance requirement agreements for post-construction storm water control.                                                                                                                        | In place by October 1, 2016                                                                             | Track number of maintenance agreements.                                                                                                                                                       |
| <b>CONSTRUCTION STORM WATER RUNOFF CONTROL</b>                                          |                                                                                                                                                                                                                |                                                                                                         |                                                                                                                                                                                               |
| SESC & building permits                                                                 | All sites within 500 feet of a lake, stream, or county drain; or disturbance of more than one acre of land, must have a Soil Erosion Sedimentation Control (SESC) permit prior to obtaining a building permit. | Ongoing                                                                                                 | Track the number of building permits and compare with the number of building permits issued contingent upon obtaining a SESC permit.                                                          |
| SESC site inspection                                                                    | Respond to complaint SESC sites to ensure compliance on an as needed basis.                                                                                                                                    | Ongoing                                                                                                 | Track the number of SESC violations, as known.                                                                                                                                                |
| <b>POLLUTION PREVENTION &amp; GOOD HOUSEKEEPING ACTIVITIES FOR MUNICIPAL OPERATIONS</b> |                                                                                                                                                                                                                |                                                                                                         |                                                                                                                                                                                               |
| Employee training                                                                       | DVD, off-site workshop, in house training, new employee orientation                                                                                                                                            | Existing employees-1 training per permit cycle. New employees-1 training session 1st year of employment | Retain documentation from training, number of employees trained.                                                                                                                              |
| Contractor training                                                                     | Provide Training Materials/Information in bid documents and/or preconstruction meetings.                                                                                                                       | As needed when new contractors are hired.                                                               | Retain documentation from training, track number of contractors trained.                                                                                                                      |
| Maintenance of Storm Water Devices                                                      | Storm water structures are maintained to obtain optimal design performance, by resident complaint or routine inspection.                                                                                       | As needed or based on complaint                                                                         | Track maintenance of storm water devices performed to improve water quality. Track any sediment quantities removed.                                                                           |
| Catch-basin / storm water control device cleanouts                                      | Clean catch-basins & storm water control devices between April and November.                                                                                                                                   | Ongoing                                                                                                 | Track amount of sediment collected, location, and frequency of catch-basins / storm water control devices cleaned.                                                                            |

|                                    |                                                                                                                                                                                                                                                                                                                                             |                             |                                                                                                                                                                                                            |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Street Sweeping                    | Conduct street sweeping from March/April to November.                                                                                                                                                                                                                                                                                       | Ongoing                     | Track amount of sediment collected and frequency of streets sweeping.                                                                                                                                      |
| Road Deicing Application           | Salt usage                                                                                                                                                                                                                                                                                                                                  | Ongoing                     | Track amount of salt used during snow removal season and compare to previous usage.                                                                                                                        |
|                                    | Sand usage                                                                                                                                                                                                                                                                                                                                  | Ongoing                     | Track amount of sand used during snow removal season and compare to previous usage.                                                                                                                        |
|                                    | Salt enhancer usage                                                                                                                                                                                                                                                                                                                         | Ongoing                     | Track amount of salt enhancer used during snow removal season and compare to previous usage.                                                                                                               |
| Roadway / parking lot maintenance  | The City maintains roads by either patching or resurfacing.                                                                                                                                                                                                                                                                                 | Ongoing                     | Reduce contaminant runoff from City roads if occurring.                                                                                                                                                    |
| Roadside Vegetation                | Mowing is the primary way that roadside vegetation is maintained.                                                                                                                                                                                                                                                                           | Ongoing                     | Aim to reduce roadside mowing to only areas that need it based on safety of traveling motorists.                                                                                                           |
| Vehicle Washing                    | City vehicles are washed at the DPW facility.                                                                                                                                                                                                                                                                                               | Ongoing                     | Onsite inspections semiannually to ensure designed system functions properly. Conduct maintenance if needed.                                                                                               |
| Chemical Management and Storage    | The DPW garage uses a variety of chemicals, such as motor oil, transmission fluid, antifreeze, and hydraulic fluid, on an as needed basis. Chemicals have secondary containment.                                                                                                                                                            | Ongoing                     | Onsite inspections semiannually to ensure designed system functions properly and proper containment is in place. Conduct maintenance if needed. Track spills.                                              |
| Spill Kits                         | Spill kit is located at the DPW facility.                                                                                                                                                                                                                                                                                                   | Ongoing                     | Inspect spill kit annually to ensure it is fully stocked.                                                                                                                                                  |
| Vehicle Fueling                    | Vehicle fueling occurs at a commercial facility, Pacific Pride. All employees are instructed to stay by and monitor their vehicles when refueling.                                                                                                                                                                                          | Ongoing                     | Ongoing inspection of refueling activities. Correct improper procedures as observed.                                                                                                                       |
| Vehicle Inspection and Maintenance | City vehicles are routinely inspected at the DPW facility. Vehicles are equipped with daily operator logs.                                                                                                                                                                                                                                  | Ongoing                     | Onsite inspections semiannually to ensure that vehicle inspection and maintenance logs are being properly conducted.                                                                                       |
| Discharges of Pollutants           | The City of Springfield has a garbage ordinance, an ordinance supplement that describes refuse procedures, and a garbage contract with Waste Management of Michigan. The City of Springfield will work with Waste Management of Michigan to amend its contract to specifically mention preventing the discharge of pollutants into the MS4. | In place by October 1, 2016 | Amended garbage contract document to include minimizing the discharge of pollutants to the MS4.                                                                                                            |
| <b>TMDL</b>                        |                                                                                                                                                                                                                                                                                                                                             |                             |                                                                                                                                                                                                            |
| In-stream monitoring               | Six, monthly grab samples from April to September from three reaches of river: the Battle Creek River before the confluence, the Kalamazoo River before the confluence, and the Kalamazoo River after the confluence. Testing for temperature; DO; pH; dissolved, particulate, and total phosphorus                                         | Begin April 2016            | Track and assess monitoring results to determine effectiveness of monitoring and to determine which activities are needed to be consistent with the Lake Allegan/Kalamazoo River Watershed Phosphorus TMDL |

## Appendix A

### *Illicit Discharge Elimination Program - Standard Operating Procedure*

#### INTRODUCTION

The purpose of the Calhoun County Illicit Discharge Elimination Plan (IDEP) is to prohibit and eliminate illicit discharges and connections, including discharges of sanitary wastewater to Calhoun County (County) municipal separate storm sewer systems (MS4), which are comprised of Calhoun County Water Resources Commissioner MS4, the Calhoun County Road Department (CCRD) MS4, the Justice Center MS4, and the Toeller Building (JC/TB) MS4. The separate storm sewer system includes both open and enclosed drainage systems that are owned or operated by the County entities and discharge to a surface water of the State or to a separate stormwater drainage system operated by another public agency.

The IDEP Standard Operating Procedure (SOP) is intended to assist field personnel in the proper procedures to investigate and eliminate illicit discharges to the County's MS4 systems.

#### EQUIPMENT LIST:

|                                                                                          |                                                                           |
|------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| Sample Pole                                                                              | Sample Collection Vessel                                                  |
| Thermometer, Methyl Red                                                                  | pH Strips, 0 – 14 range ( <i>Verify expiration date</i> )                 |
| Surfactant: CHEMets Kit: K-9400, Range: 0-3 ppm, MDL: 0.125 ppm / Method: Methylene Blue | Ammonia: CHEMets Kit: K-1419, Range 0-2, and 0-20 ppm, Method: SALICYLATE |
| CHEMets Refill: R-9400<br>( <i>Verify expiration date</i> )                              | CHEMets Refill: R-1401<br>( <i>Verify expiration date</i> )               |
| Protective, disposable gloves                                                            | Safety glasses                                                            |
| Manhole cover removal device                                                             | Global Positioning System Unit                                            |
| Waste container for test kit materials                                                   | MS4 map                                                                   |
| Investigation sheets and clipboard                                                       | Pen and pencil                                                            |
| Photo device                                                                             |                                                                           |

#### DRY WEATHER SCREENING:

Dry weather screening should be conducted at a minimum of 48 hours after any precipitation. The priority for screening should be in this order:

- 1) Areas with older sewer lines or with a history of sewer overflows or cross-connections
- 2) Areas with sewer conversions or historic combined sewer systems
- 3) Areas with older infrastructure
- 4) Industrial, commercial, or mixed use areas
- 5) Areas with a history of past illicit discharges
- 6) Areas with a history of illegal dumping
- 7) Areas with poor dry-weather water quality
- 8) Areas with septic systems
- 9) Areas with water quality impacts, including waterbodies identified in a Total Maximum Daily Load Type of commercial activity
- 10) Other potential pollutant generating sites

The heavily urbanized areas of the Kalamazoo River and the Battle Creek River have a predominance of aging infrastructure. Those areas should be the first priority when beginning the IDEP investigations. The MS4 map can be used to locate outfalls.

**Procedure:**

*(A minimum of two employees should investigate outfalls for safety reasons.)*

1. Once outfalls are prioritized, assemble all needed equipment.
2. Locate outfalls to be investigated during a field investigation. *Note: Some outfalls may be difficult to get to. Use caution when trying to reach them.*
3. Once the outfalls have been found, observe if they have dry weather flow. Observe if any unusual conditions, such as the presence/absence of flow, changes in water clarity, color, and odor; the presence of suds, oil sheens, sewage, floatable materials, bacterial sheens, algae, and slimes; and the staining of the banks or unusual vegetative growth are present. Also investigate undocumented connections and the integrity of the discharge structure.
4. Record observations on the Dry Weather Screening form.
5. Record GPS coordinates, if no coordinates are in the system.
6. Take a picture of the outfalls.

**Dry Weather Flow Present:**

1. If flow from the outfall is obviously from sanitary sewage, immediately contact either the Wastewater Treatment Plant, 269-966-3513, should the discharge be from the City of Battle Creek's sanitary system or the Calhoun County Health Department, 269-969-6341, from a failing septic system to report the illicit discharge.
2. If flow from the outfall is not obvious, obtain a sample and analyze it for temperature, pH, surfactants, and ammonia. Wear disposable gloves and safety glasses while collecting and analyzing the sample. Place the used ammonia and surfactant ampules in the sealed bucket for proper disposal.
3. If the surfactant and ammonia levels are at or below the detection limit, groundwater or exempted non-stormwater may be the source of the dry weather flow. Note results on the IDEP Investigation form.
4. If the surfactant level is higher than the detection limit, sewage or wash water may be present. If the ammonia level is higher than the detection limit, sewage, wash water, or industrial discharge may be present. Note results on the IDEP Investigation form and conduct a follow-up investigation.

**ILLICIT DISCHARGE SOURCE IDENTIFICATION**

Once an illicit discharge has been detected and the source is not obvious, the County will conduct a further investigation. The CCWRC will use any of the following methods:

- Upstream manhole investigation
- Indicator parameter testing
- Video testing
- Dye testing
- Smoke testing
- Drainage area investigations
- Documented visual observation or physical indicators
- Homeowner surveys and surface condition inspections for on-site sewage disposal systems

Tracking of identification and elimination should be recorded on the investigation report.

## Appendix B

### *Forms and Logs*



**CITY OF SPRINGFIELD**  
**DRY WEATHER SCREENING FORM**

Outfall ID: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_ Time: \_\_\_\_\_ am/pm By: \_\_\_\_\_

Weather Conditions: \_\_\_\_\_ Temp: \_\_\_\_\_ Wind: \_\_\_\_\_

Description and condition of outfall structure: \_\_\_\_\_

Location GPS? **Y / N**      Picture of Outfall? **Y / N**

| Observation        | Y / N | Comments | Follow Up?<br>Y / N |
|--------------------|-------|----------|---------------------|
| Dry Weather Flow?  |       |          |                     |
| Water Clarity?     |       |          |                     |
| Odor?              |       |          |                     |
| Suds?              |       |          |                     |
| Oil Sheen?         |       |          |                     |
| Floatables?        |       |          |                     |
| Bacti Sheen?       |       |          |                     |
| Algae?             |       |          |                     |
| Slimes?            |       |          |                     |
| Staining of banks? |       |          |                     |
| Unusual veg.?      |       |          |                     |
| Color?             |       |          |                     |
| Sample Taken?      |       |          |                     |

If a sample was taken, record results below:

| Parameter      | Value | Units    |
|----------------|-------|----------|
| Temperature    |       | °C       |
| pH             |       | S.U.     |
| Surfactant     |       | mg/L     |
| Ammonia        |       | mg/L     |
| Fecal Coliform |       | #/100 mL |



CITY OF SPRINGFIELD  
IDEP FOLLOWUP INVESTIGATION REPORT

**FACILITY INFORMATION**

Facility Name:

Outfall ID:

Facility Address:

**INSPECTION INFORMATION**

Insp Start Date:

Insp End Date:

Calhoun County Inspector(s):

Inspection Summary/Notes (include information on suspected source):

Action Required:

Due Date:

Was the source eliminated? Yes / No

Is Enforcement Action Required? Yes / No

Comments:

Completed by \_\_\_\_\_

Date \_\_\_\_\_



**CITY OF SPRINGFIELD**

**ENFORCEMENT RESPONSE PROCEDURE REPORTING FORM**

Name of Person/Owner illegally discharging to MS4: \_\_\_\_\_

Date of violation: \_\_\_\_\_

Location of violation: \_\_\_\_\_

Description of violation: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date enforcement response issued: \_\_\_\_\_

Description of enforcement response used: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Schedule for returning to compliance: \_\_\_\_\_

**Date the violation was resolved:** \_\_\_\_\_

## Appendix C

### *Contractor Bid Document*

**CONTRACTOR STORM WATER REQUIREMENTS:** The City of Springfield has a storm sewer system that is separate from sanitary system located within the City. Storm water from the city's system drains directly to local waterways without being cleaned. The City is subject to the requirements of Storm Water Regulations, 33 USC 1251, et seq., published by the United States Environmental Protection Agency ("EPA") in the Federal Register on December 8, 1999. One of the requirements is to ensure that contractors performing work for the city be trained in illicit discharges and pollution prevention and good housekeeping. The following are the items each employee performing work for the city must be trained on by his/her employer prior to work commencing:

#### General Requirements:

- Block or add best management practices to storm drains in all construction or project areas prior to any work commencing.
- A Soil Erosion and Sedimentation Control (SESC) permit is required for all sites within 500 feet of a lake, stream, or county drain; or if a site disturbs more than one acre of land. Any sedimentation and erosion control practices should be well defined and all expectations should be clarified in all projects.
- Clean or rinse all equipment in areas with a secure rinse pad or where wash water will not runoff into storm drains or surface waters.
- Inspect equipment daily and repair any leaks. Use drip pans or absorbent materials to contain leaks until repairs are made.
- Implement spill control and clean-up practices for leaks and spills from fueling, oil, or use of hazardous materials. Never allow a spill to enter the storm drain system.
- Use the least hazardous material available for all projects. When the use of hazardous materials is necessary, ensure proper use, storage, and disposal of these materials.
- Protect and maintain as much natural vegetation as possible during the project
- Properly dispose of all debris and excavated soil material – do not place near storm drains, rivers, streams, wetlands, or any environmentally sensitive area.
- Minimize water use and control all storm water discharge where possible.
- Schedule activities for dry weather.

#### Illicit Discharges – all illicit discharges and illicit connections:

- Illicit discharges means any discharge to, or seepage into, a separate storm sewer that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; the dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or leaf litter; the collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.
- Illicit connection means a physical connection to the MS4 that 1) primarily conveys illicit discharges into the Municipal Separate Storm Sewer System (MS4)\*, or 2) is not authorized or permitted by the local authority.
- **Should a significant spill occur or if a discharge occurs to Waters of the State, notify the Michigan Department of Environmental Quality and the Calhoun County Water Resources Commissioner.**

#### Bridge and Stream Crossing:

- Use suspended netting or tarps to capture paint, rust, paint-removing agents, or other materials to prevent discharge of materials to surface waters.
  - Use water based paints for marking pavement.
  - Mix limited amounts of asphalt or concrete and only what is needed for the job.
  - Stockpile resurfacing materials away from streets, storm drains, and watercourses and cover material piles with a tarp during wet weather.
  - Properly manage concrete slurry produced from diamond grinding, concrete sawing, or drilling activities using as little water as possible. Cover storm drains completely with filter fabric or plastic during the activity and contain the slurry using straw bales, sandbags, or gravel dams around the storm drains. Slurry management for diamond grinding can often be handled on site, such as reusing the solids from the grinding process while the water is infiltrated in the road right-of-way. For sawing and drilling activities, prevent wastewater from entering storm drains and surface waters by directing it to vegetated areas or vacuuming it for proper disposal.
  - Do not use coal tar emulsions to seal asphalt surfaces.
- 
- Sweep grass clippings and leaves onto turf areas. Do not allow clippings or leaves to go into the MS4.
  - Comply with Michigan Phosphorus Fertilizer restrictions. For more information please visit, [http://www.michigan.gov/documents/mdard/Phosphorus\\_fertilizer\\_restriction\\_summary\\_for\\_M\\_DARD\\_website\\_1\\_2012\\_372599\\_7.pdf](http://www.michigan.gov/documents/mdard/Phosphorus_fertilizer_restriction_summary_for_M_DARD_website_1_2012_372599_7.pdf)

\* An MS4 is a system of drainage (including roads, storm drains, pipes, and ditches, etc.) that is not a combined sewer or part of a sewage treatment plant. During wet weather, pollutants are transported through MS4s to local water bodies.

## Appendix D

### *Regulatory Documents*