

St. Clair County, Michigan



Public Education Plan Revised January 2025

National Pollutant Discharge Elimination System Application for Discharge of Stormwater to Surface Waters from a Municipal Separate Storm Sewer System representing the following Watershed Partners and Nested Jurisdictions:

ST. CLAIR COUNTY

ST. CLAIR COUNTY'S NESTED JURISDICTIONS:

ALGONAC COMMUNITY SCHOOLS DISTRICT
PORT HURON AREA SCHOOL DISTRICT
EAST CHINA SCHOOL DISTRICT
MARYSVILLE PUBLIC SCHOOLS DISTRICT
ST. CLAIR COUNTY COMMUNITY COLLEGE
SCC REGIONAL EDUCATIONAL SERVICE AGENCY

NORTHEASTERN WATERSHED PARTNERS:

CITY OF MARINE CITY
CITY OF MARYSVILLE
CITY OF ST. CLAIR
CITY OF PORT HURON
CLYDE TOWNSHIP
EAST CHINA CHARTER TOWNSHIP
FORT GRATIOT CHARTER TOWNSHIP
KIMBALL TOWNSHIP
PORT HURON CHARTER TOWNSHIP



ILLICIT DISCHARGE ELIMINATION PLAN

**ST. CLAIR COUNTY'S NORTHEASTERN WATERSHEDS
(LAKE HURON DIRECT DRAINAGE, LOWER BLACK RIVER, AND
ST. CLAIR RIVER DIRECT DRAINAGE WATERSHEDS),
THE BELLE AND PINE RIVER WATERSHEDS AND ANCHOR BAY
PORTION OF ST. CLAIR COUNTY**

Prepared on behalf of

ST. CLAIR COUNTY;

AND ST. CLAIR COUNTY'S NESTED JURISDICTIONS:

- EAST CHINA SCHOOL DISTRICT,
- MARYSVILLE PUBLIC SCHOOL DISTRICT,
- PORT HURON AREA SCHOOL DISTRICT,
- REGIONAL EDUCATIONAL SYSTEM AGENCY,
- ST. CLAIR COUNTY COMMUNITY COLLEGE,
- ALGONAC COMMUNITY SCHOOLS DISTRICT

AND THE FOLLOWING LOCAL MUNICIPALITIES IN THE

NORTHEASTERN WATERSHEDS:

- CITY OF MARINE CITY
- CITY OF MARYSVILLE
- CITY OF ST. CLAIR
- CLYDE TOWNSHIP
- EAST CHINA CHARTER TOWNSHIP
- FORT GRATIOT CHARTER TOWNSHIP
- KIMBALL TOWNSHIP
- PORT HURON CHARTER TOWNSHIP

ANCHOR BAY WATERSHED:

- CITY OF ALGONAC
- IRA TOWNSHIP
- CLAY TOWNSHIP

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I. PROGRAM OVERVIEW

A. Purpose

This Illicit Discharge Elimination Program (IDEP) plan was developed on behalf of St. Clair County (SCC), its nested jurisdictions, and the local municipalities who have jurisdiction over a municipal separate storm sewer system (MS4) in the urbanized area (as defined by the most recently published census) and are also located within SCC's Northeastern Watersheds (NEW) or Anchor Bay Watershed (ABay). These local municipalities will hereafter be referred to as the "NEW and ABay Partners". This plan was developed to assist the county, these educational institutions and local municipalities to collaboratively meet IDEP requirements of the State of Michigan National Pollutant Discharge Elimination System (NPDES) Application for Discharge of Storm Water to Surface Waters from a Municipal Separate Storm Sewer System (MS4).

This plan outlines IDEP activities which generally can be described as looking for and correcting sources of pollution in regulated MS4s. This includes, but is not limited to, pollution sources such cross connections between the sanitary and storm sewer systems, failing septic systems, dumping of illegal grass and leaf clippings, garbage, pet waste, and/or hazardous materials in the MS4. Activities to correct any of these pollution sources, or other sources unnamed, are considered IDEP activities and shall be recorded for the purposes of evaluating permittee's IDEP activities and this plan.

B. Partners

This IDEP plan represents the following partners:

SCC:

- SCC Health Department (HD)
- SCC Road Commission (RC)
- SCC Drain Commissioner's Office (DO)
- SCC Parks and Recreation Commission (PARC)
- SCC Building and Operations Department (BOD)

SCC's nested jurisdictions:

- Algonac Community School District (ACSD)
- East China School District (ECSD)
- Marysville Public School District (MPSD)
- Port Huron Area School District (PHASD)
- SCC Regional Educational Service Agency (RESA)
- St. Clair County Community College (SC4)

The NEW Partners:

- City of Marine City
- City of Marysville
- City of St. Clair
- Clyde Township
- East China Charter Township
- Fort Gratiot Charter Township
- Kimball Township
- Port Huron Charter Township

The Anchor Bay Watershed Partners:

- City of Algonac
- Clay Township
- Ira Township

C. Timeline

Activities will occur over the five year permit cycle, starting with the issuance of the permit, or until SCC and its NEW Partners' permits expire.

D. Geographic Scope

This plan addresses regulated MS4s, under the jurisdiction of SCC, its nested jurisdictions and the NEW and Anchor Bay Partners, which are located in the urbanized areas of SCC as defined by the most recent census, and are also contained within the NEW, Pine and Belle River Watersheds. The NEW is comprised of three watersheds: Lake Huron Direct Drainage, Lower Black River, and the St. Clair River Direct Drainage Watersheds. The regulated MS4s within the Pine and Belle River Watersheds also have regulated MS4s in these watersheds. The Anchor Bay Watershed is on the edge of the St. Clair River and Lake St. Clair. The bay encompasses 38,000 acres of wetland habitat for fish and wildlife, including St. Johns Marsh, a 2,500-acre coastal wetland located in Clay and Ira Townships. Although much of the flow to the bay comes from the St. Clair River, the major streams draining the watershed include:

St. Clair County: Crapaud Creek, Marsac Creek, Swan Creek, Meldrum Creek, Beaubien Creek, Swartout Creek, the Marine City Dredge Cut and the Harsen's Island Drain (aka Krispin Drain).

Macomb County: Auvase Creek, Crapaud Creek, and the Salt River.

E. Collaborative Partnership and Interagency Agreement

While SCC has developed this plan in collaboration with its nested jurisdictions, the NEW and Anchor Bay Partners, SCC is not responsible for implementation of IDEP activities by the NEW and Anchor Bay Partners within their own MS4s. Collaboration and coordination between SCC, the NEW and Anchor Bay Partners are important components of this IDEP plan, especially in regards to IDEP evaluation, but in no way is any one permittee more responsible for this coordination than another. SCC, its nested jurisdictions, the NEW and Anchor Bay partners currently meet as a Watershed Advisory Group (WAG) on a regular basis. It is within this group that decisions must be made regarding how collaborative actions of this plan will be accomplished and funded.

As part of this IDEP plan, all of the permittees and partners that are collaborating on this plan (SCC, its nested jurisdictions, the NEW and Anchor Bay Partners) agree that if one becomes aware of a non-stormwater discharge that is being generated within their MS4 and is entering another of one the permittee's downstream MS4, then the permittee who owns and operates the upstream MS4 will eliminate this discharge as soon as possible. This interagency agreement, between all the permittees and partners of this plan, allows for time and resources towards IDEP activities that will be most effective. The submission of this plan by each permittee signifies that all permittees and partners listed

in this plan are in agreement with this interagency agreement and nullifies the need for separate agreements between each.

II. LOCATION/ NUMBER OF DISCHARGE POINTS/ OUTFALLS

The number of discharge points/ outfalls each partner has is indicated in the following table. Blueprints and design maps providing a more detailed location of these discharge points/ outfalls are available from each permittee as outlined in their individual permit applications.

<i>Regulated Entity/ Agency</i>	<i># of discharge points/ outfalls</i>
SCC Building and Operations Dept. (SCCBOD)	10
SCC Drain Office (SCCDO)	26
SCC Road Commission (SCCRC)	10
SCC Parks and Recreation Commission (SCCPARC)	4
St. Clair County's SUBTOTAL	50
East China School District (ECSD)	8
Marysville Public School District (MPSD)	26
Port Huron Area School District (PHASD)	39
SCC Regional Educational School Agency (RESA)	5
St. Clair County Community College (SC4)	7
Algonac Community School District (ACSD)	12
St. Clair County's nested jurisdictions SUBTOTAL	97
City of Marine City	38
City of Marysville	14
City of St. Clair	60
Clyde Township	0
East China Charter Township	4
Fort Gratiot Township	6
Kimball Township	1
Port Huron Charter Township	13
NEW Partners' SUBTOTAL	136
City of Algonac	47
Clay Township	8
Ira Township	5
Anchor Bay Partners' SUBTOTAL	60
TOTAL	343

Note: Each member responsible for their own outfall/discharge point screening. St. Clair County Health Department will only screen those outfalls designated being owned by the county of St. Clair.

III. ILLICIT DISCHARGE IDENTIFICATION & INVESTIGATION

A. Screening Procedure

The purpose of screening MS4 discharge points is to determine whether potential illicit discharges exist and if there is an MS4 that needs investigation and potential source control upstream. Screening will include visiting an MS4 discharge point during dry weather (less than 0.1 inches of rain within the previous 48 hours) and record the following parameters:

- Id. number
- Receiving water
- Municipality
- Crew name
- Date
- Address/ Location
- Odor
- Deposits
- Color
- Stains
- Outfall material & diameter
- Turbidity
- Flow
- Vegetation
- Structural condition
- Biology (bacterial sheens, algae, slimes)
- Floatables

A copy of the spreadsheet that can be used to screen discharge points can be found in **Appendix A** of this plan. Dry weather screening will be performed once every permit cycle.

If flow is apparent, test discharge with field kit for temperature, pH, surfactants, and ammonia, and record flow information and test results on data sheet. Readily observable sources of flow to the storm sewer will be noted. For example, lawn irrigation may be misdirected onto impermeable surfaces or irrigation runoff may be entering the drainage system. If a sample cannot be analyzed at the time of initial screening, follow-up testing shall occur within 2 business days as weather allows.

E.coli and surfactant tests may not be good indicators for all potential pollutants of concern, but partners will also be screening discharge points for flow, floatables, oil sheen, color, odor, turbidity, vegetation condition, and other variables listed previously. All screening and survey results, whether they are only observations or sample results, will be used to determine if there is reason for additional investigations upstream of the outfall.

Because screening is a one-time grab sample event and can indicate a variety of point or non-point sources upstream, initial sample results must be taken with a grain of salt. A common example of a non-point source that can result in high *E.coli* counts at a discharge point but that cannot be easily corrected, or even located, is a wild animal living in the MS4 itself. Resources to follow up screening results are limited and must be prioritized. Resampling a discharge point during dry weather will occur two more times when an initial screening sample demonstrates *E.coli* levels > 1,000cfu/ 100 mL before concluding that source investigations are needed.

Procedure to establish rationale for further investigation:

- Locate outfall/discharge point, complete data sheet with site information.

- If new outfall/discharge point, assign identification number and mark location on map
- If flow is apparent, test discharge with field kit for temperature, pH, surfactants, and ammonia, and record flow information and test results on data sheet. Readily observable sources of flow to the storm sewer will be noted. For example, lawn irrigation may be misdirected onto impermeable surfaces or irrigation runoff may be entering the drainage system. If a sample cannot be analyzed at the time of initial screening, follow-up testing shall occur within 2 business days as weather allows. Note *E. coli* testing will not be completed during the preliminary inspection as coordination is required with the laboratory prior to dropping off sample.
- Assign follow-up prioritization based on tested field parameters per table below:

Parameter	Test Range	Priority Classification			
		None	Low	High	Immediate
Temperature (°F)	32-100	44-75	40-43 or 76-85	32-39 or 86-99	<32 or >100
pH	0-14	6-9.5	5-6 or 9.5-10.5	4-5 or 10.5-11	<4 or >11
Surfactants (ppm)	0-3	0	0.25-0.5	0.5-1	2-3
Ammonia (ppm)	0-6	0-1	1-3	3-6	>6

- **Immediate - report to appropriate agency when discharge found, agency to follow up within one week to check for dry-weather flow.**
- **High and Low - notify stormwater manager; follow up within 14 days to check for dry-weather flow.**
- In follow-up visits, test flow again with field test kits and collect an *E.coli* sample if preliminary screening results suggest it would be beneficial. If test results still indicate follow up necessary, collect additional samples for lab analysis, if necessary, and follow steps in “Finding the Source” section below.
- If no flow apparent, evaluate the areas for indicators of pollution, i.e. the presence of algae, unusual vegetative growth, staining, bacterial sheens, or debris.
- If indicators show a sign that pollution may exist, per the above table, assign follow-up prioritization.
 - **Immediate - report to the appropriate agency when discharge found, agency to follow up within one week.**
 - **High and Low - notify stormwater manager; follow up within 14 days.**

B. Source Investigation Procedure

Source investigative procedures are investigative efforts in a waterbody where screening and/or other monitoring results indicate a potential illicit discharge upstream. Surveys may involve reviewing storm and sanitary system maps, walking or driving open drains upstream, testing catch basins upstream for *E. coli*, surfactants, ammonia, conductivity and/or temperature, dye testing, televising or smoke testing. Source investigations can be

very resource demanding in an enclosed system. Investigating the age of infrastructure and land use where illicit discharges may be more likely and the location of discharge points in the area to be investigated is essential before initiating field work. Procedures vary based upon the methods used and will be determined before initiation of investigative activities.

IV. RESPONDING TO ILLEGAL DUMPING AND SPILLS

A. Schedule for responding to an illicit discharge complaint

Evaluation of an illicit discharge complaint is very important and shall be initiated within two (2) business days of a complaint being received, if not sooner. The only exception is when the nature of the complaint includes dumping and/or a spill of a potentially hazardous material in which case the response will be as immediate as possible.

All actions initiated as a result of a complaint shall be recorded as part of the complaint's file until it is resolved and/or closed. The initial response to a complaint shall include referral to the appropriate staff for a field visit to the complaint location. As part of this initial response, staff shall record:

- visual observations,
- conversations with the complainer or neighbors in the vicinity of the complaint,
- pictures of the complaint location and/or characteristics, and
- follow-up actions that result.

If, after staff conduct an initial field visit, it is determined that the complaint is not worthy of further response, the reasons for closing the complaint shall be recorded, the complaint shall be closed, and this shall all remain documented in the permittee's complaint files.

If a complaint is received regarding hazardous material that has any chance of entering the MS4 or the waters of the state, response shall be initiated as immediately as possible. Staff shall follow the attached spill response plan or their own spill response plan if different from that attached in **Appendix B**.

B. Schedule for field screening and source investigations

If the initial site visit which results from a complaint, warrants performing further field screening and/or source investigations, these actions shall be initiated within seven (7) days of the initial site visit. All field investigations shall be recorded as part of the complaint's file until that complaint has been solved and/or officially closed.

V. REPORTING RELEASES FROM MS4s

The procedures for responding to spills (or illegal dumping) of various sizes and hazards are detailed in **Appendix B**, as are the reporting requirements.

VI. RESPONSE TO ILLICIT DISCHARGES ONCE A SOURCE IS IDENTIFIED

Permittees shall correct and/or enforce the correction of illicit discharges within 90 days of notification to the property owner or confirmation of source identification to the maximum extent practicable.

SCC, the NEW and ABay Partners are committed to expeditiously correcting any illicit discharges within their MS4. Once the source of an illicit discharge has been confirmed as privately owned, IDEP partners will use the following procedures to correct the illicit discharge. If a partner decides to modify the following procedure, they will make note of the alternative procedures in their IDEP records and progress reports for their permit.

1. First Notice: Notification of Problem and Correction Needed

Once the source(s) of an illicit discharge is located, within 5 business days of the confirmation, the permittee will provide the first written notice to the owner of the illicit discharge by registered mail. The first written notice will notify the discharge owner of the illicit discharge, the regulatory authority to require correction, and the potential enforcement actions that will take place if the discharge is uncorrected in 90 days. All notifications will request that the discharge owner contact the permittee regarding plans for correction within 90 days. Tracking of all notifications and documentation of registered mail receipts will be retained by the permittee.

2. Second Notice: Forty-Five Days Left to Respond

If 45 days has passed from the date of the first written notice and no response has been received by the discharge owner, the second written notice will be sent. The second written notice will remind the discharge owner of the illicit discharge, the prior notice, the regulatory authority to require correction, the potential enforcement actions that will take place if the discharge is uncorrected in 45 days, and a request for the owner to contact the permittee regarding plans for correction.

3. Final Notice

If 90 days has passed from the date of the first written notice, the third written notice will be sent. The third notice will remind the discharge owner of the illicit discharge, the prior notice, the regulatory authority to require correction, and plans to enforce the correction of the illicit discharge.

Enforcement for correcting an illicit discharge is outlined in each permittee's regulatory mechanism as outlined in each of their Permit Applications. Enforcement should include an extension process for unforeseen and complicated circumstances.

VII. IDEP TRAINING AND EVALUATION

A. IDEP Training

Permittees will train staff who are involved in storm water management related activities, or who have jobs with the potential for witnessing illicit discharges and connections.

Staff will be trained at least once every five years and within the first year of employment.

The IDEP training will include, at a minimum, the following information:

- The definition of illicit discharges and connections;
- Techniques for finding illicit discharges include field screening, source identification, and recognizing illicit discharges and connections; and
- Methods for eliminating illicit discharge and the proper enforcement response.

Sign in sheets at staff meetings where IDEP topics are discussed, documentation of attendance at an IDEP workshop, and education materials used will be kept for documentation purposes of this permit.

B. IDEP Evaluation

While it is tempting to use ambient water quality monitoring at local beaches to rate the effectiveness of this plan, it is not appropriate. Many problems with *E.coli* testing has been documented and the EPA is currently undergoing research to try and improve *E.coli* testing and subsequent closures of beaches. Many times *E.coli* levels at beaches may not be due to local MS4s but physical conditions at the beach and/or meteorological conditions such as wind, current and rain. Therefore, while beach testing during the summer season does provide guidance for permittees in their prioritizing of MS4s for screening and investigations, it does not provide an effective evaluation tool. Therefore, SCC and the NEW group will use questionnaires and task completion to evaluate the effectiveness of this IDEP plan.

1. Questionnaires

Once per permit cycle, SCC, the NEW and ABay WAG will develop and distribute a questionnaire to rate the effectiveness of this IDEP plan. This questionnaire will be distributed to the storm water permit representative for SCC, the NEW and ABay Partners. The questionnaire will be developed, tabulated and discussed collaboratively at a NEW WAG and Anchor Bay WAG meeting to determine if IDEP implementation procedures should be revised.

2. Task Completion

At approximately the same time the above questionnaire is developed, SCC, the NEW and ABay Partners will evaluate whether the following tasks in this IDEP plan have been completed as planned:

- Screening;
- Source Investigations (as applicable);
- Correction of illicit discharges;
- Response to illegal dumping and spills;
- Response to illicit discharges outside of priority areas
- Reporting releases from MS4s; and
- Response to illicit discharges once a source is identified.

The completion of these tasks, as outlined in this IDEP plan, will be used in conjunction with the questionnaire results to determine the overall effectiveness of this IDEP plan and if any revisions in priorities or procedures shall be initiated.

VIII. RECORD KEEPING AND REPORTING

Records that will be generated as part of this IDEP plan are critical for demonstrating compliance with IDEP requirements. Records and documentation that shall be kept by each permittee include:

- documentation of MS4 discharge point screening activities;
- chain-of-custody records for laboratory samples;
- laboratory data sheets;
- tracking of screening and/or source investigations;
- tracking of complaints and follow up actions;
- tracking of spill response and follow up actions; and
- tracking of notification, enforcement and correction actions.

All of this information will be kept on file for a period of three years and/or submitted to EGLE as required by permit.

IX. PROCEDURES AND QUALITY ASSURANCE

A. Parameters and Associated Analytical Procedures

All *E.coli* samples shall be collected in a sterile container (typically available from lab servicer). The sample bottle will be labeled with the MS4 identification # and/or an address, the sampler's initials, and the date and time of sampling. Samples should be collected as close to the center of the waterbody as possible or directly from the MS4 discharge point. The container should not be allowed to touch other surfaces and collectors shall wear gloves. Samples from enclosed drains will use a sampling pole. Samples will immediately be put on ice and transferred to the certified lab facility for *E.coli* analysis within eight hours using a proper chain-of-custody documentation.

The surfactant test kit that can be used in this project is a CHEMetrics Surfactants test kit (0-3ppm). A detailed description of operating procedures for the surfactants test kits are included with each kit and are readily available online from the manufacturer.

B. Calibration Procedures

The colorimetric test kits of surfactants do not require calibration. However, if the expiration data on the color comparator, ampoules, vacu-vials, stabilizer solution, or any other component is exceeded, a replacement component will be ordered from the manufacturer immediately.

APPENDIX A: Illicit Discharge Elimination Program Discharge Point Screening Sheet

Outfall Inspection Form

General

Outfall #: _____ Photograph #: _____ Date: _____ Crew Initials: _____
Right _____ Left _____ Side of drain looking upstream: _____

Location: _____

Latitude: _____ Longitude: _____

Weather: Air temp.: _____ Rain: Yes ___ No ___ Sunny: ___ Cloudy: ___

Number of days of no precipitation or runoff events prior to inspection: _____

Point Source Information

Size _____

Type/Material _____

Flow Present _____

Depth of water in Pipe (inches) _____

Check if Submerged _____

Land Use/Area

Residential
 single multi Manufactured
 Commercial/Business Agricultural
 Industrial Wooded Area
 Transportation Meadow

Known Use: _____

Physical Discharge Observations

Odor: None ___ Sewage ___ Sulfide ___ Oil ___ Gas ___ Rancid/Sour ___ Other ___

Color: None ___ Yellow ___ Brown ___ Green ___ Red ___ Gray ___ Other ___

Turbidity: None ___ Cloudy ___ Opaque ___

Floatables: None ___ Petroleum ___ Sheen ___ Sewage ___ Other ___ (collect sample)

Deposits/Stains: None ___ Sediment ___ Oily ___ Describe ___ (collect sample)

Vegetation Conditions: Normal ___ Inhibited Growth ___ Excessive Growth ___

Extent: _____

Erosion present: Yes ___ No ___ Describe: _____

Damage to outfall structures:

None ___ Concrete Cracking ___ Concrete Spalling ___ Peeling Paint ___ Metal Corrosion ___

Other damage: _____ Extent: _____

Other

Known industrial or commercial uses in drainage area? Yes ___ No ___ Describe _____

Stream Conditions: _____

Any additional notes: _____

APPENDIX B: Spill Response Procedures

SPILL RESPONSE PLAN template

EMERGENCY NUMBERS

NAME, TITLE

XXXX-XXX-XXXX (cell phone)

XXX-XXX-XXXX (Municipal Office phone)

Fire Department

Emergency 911

Non-Emergency XXX-XXX-XXXX

St. Clair County Sheriff's Department

Emergency 911

Non-Emergency 810-985-8115

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

During business hours: Southeast Michigan District Office in Warren: 586-753-3700

After business hours: Pollution Emergency Alert System (PEAS): 1-800-292-4706

United States Coast Guard

Spill Alert for Navigable Waterways: 313-568-9524

Pro Services Environmental, Port Huron

A contractor to be called for spill response services in the event the municipality or agency is unable to properly contain and clean up the spill (i.e., large or hazardous spills).

Spill Response Hotline (manned 24 hours/day): 810-990-9513

Office phone number (also linked to a cell phone after hours): 810-982-7271

SPILL RESPONSE PROCEDURES

If a spill (or illegal dumping) is large or hazardous or cannot be contained on site, so that it might be released to the surface waters or groundwater of the state, **it shall be reported immediately by calling 911 to dispatch the Fire Department** and by calling the Michigan Department of Environment, Great Lakes, and Energy (EGLE) at the following numbers. The Fire Department will mobilize the County Hazardous Operations Team if deemed necessary.

During regular business hours, the EGLE district office in Warren should be called at: (586) 753-3700. During non-business hours call the Pollution Emergency Alert System (PEAS) at 1-800-292-4706.

If the spill might reach navigable waters such as the Black River, the Coast Guard must also be called at: (313) 568-9524.

Following are spill response procedures and equipment for several levels of spills. Spills that are below the threshold reporting quantities in the state's Part 5 Rules (see Appendix C), or that don't reach waters of the state, do not need to be reported to the EGLE.

**SPILL RESPONSE - FOR SMALL SPILLS OF LOW-HAZARD CHEMICALS
(Less than 5 gallons of oil or fuel)**

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responders.
2. If safe, stop source of spill (plug hole, upright the container, shut off valve).
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and (nearby electrical equipment). **If serious hazards are present leave the area and call 911.** When in doubt consult the Material Safety Data Sheets for hazards of chemicals.
4. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
5. Notify Supervisor.
6. If spilled material has entered a storm sewer or drain, contact: **MUNICIPAL CONTACT at xxx-xxx-xxxxx.** If they are not available and the spill might be released to a stream or county drain or ground water, call 911 to dispatch the Fire Department and call the EGLE at (586) 753-3700 or 1-800-292-4706 (the Pollution Emergency Alert System - PEAS).
7. Clean up spilled material with absorbent pads and floor dry (**do not flush with water**).
8. Dispose of cleaned material/absorbent pads in a secure container for proper disposal.
9. Make sure area is not slippery (if slippery, put down no-slip material).
10. Complete a Spill Reporting Form.

SUGGESTED MINIMUM SPILL RESPONSE EQUIPMENT

- Floor dry
- Shovel
- Broom
- Caution Tape
- Absorbent Boom
- Absorbent Pads
- Container for clean-up 30 gal
- Sample Bottles

SPILL RESPONSE - FOR MEDIUM SPILLS OF LOW-HAZARD CHEMICALS (5-10 gallons of oil or fuel)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responders.
2. If safe, stop source of spill (plug hole, upright the container, shut off valve).
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and nearby electrical equipment. **If serious hazards are present leave the area and call 911.** When in doubt consult the Material Safety Data Sheets for hazards of chemicals.
4. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
5. Call co-workers and Supervisor for assistance and to make them aware of the spill and potential dangers.
6. Stop spill from spreading (use absorbent or other material).
7. If spilled material has entered a storm sewer or drain contact: **MUNICIPAL CONTACT at xxx-xxx-xxxxx** (cell phone number). If he/she is not available and the spill might be released to a county drain or stream or ground water, **call 911 to dispatch the Fire Department** and call the EGLE at (586) 753-3700, or 1-800-292-4706 (the Pollution Emergency Alert System - PEAS). The Fire Department will notify the County Hazardous Operations Team if necessary.
8. Clean up spilled material with absorbent pads and floor dry (**do not flush with water**).
9. Dispose of cleaned material/absorbent pads in a secure container for proper disposal.
10. Make sure area is not slippery (if slippery, put down no-slip material).
11. If township employees are unable to properly contain and clean up the spill (i.e., large or hazardous spills) contact the Supervisor or Clerk immediately. If they are unavailable and the situation requires immediate response, call contractor Pro Services of Port Huron for containment and clean-up at 24-hour Hotline: (810) 990-9513.
12. Complete a Spill Reporting Form. Send to EGLE if necessary.

SUGGESTED MINIMUM SPILL RESPONSE EQUIPMENT

- Floor dry
- Shovel
- Broom
- Caution Tape
- Absorbent Boom
- Absorbent Pads
- Container for clean-up 30 gal
- Sample Bottles

SPILL RESPONSE PLAN - LARGE SPILLS AND HAZARDOUS CHEMICALS (Greater than 10 Gallons of oil or fuel)

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responders.
2. If safe, stop source of spill (plug hole, upright the container, shut off valve).
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, turn off engines and nearby electrical equipment. **If serious hazards are present leave the area and call 911.** When in doubt consult the Material Safety Data Sheets for hazards of chemicals.
4. Block the nearest storm drain (use absorbent or other material as necessary, close valve to drain, cover or plug drain).
5. Call co-workers and Supervisor for assistance and to make them aware of the spill and potential dangers. Have Supervisor notify Fire Department and Sheriff's Dept. of spill and possible lane closures and need for assistance. The Fire Department will notify the County Hazardous Operations Team if necessary.
6. Stop spill from spreading (use absorbent or diking material such as sand, dirt, etc.)
7. If spilled material has entered a storm sewer or drain, contact: **MUNICIPAL CONTACT at xxx-xxx-xxxxx.** If they are not available and the spill might be released to a county drain or stream or ground water, **call 911 to dispatch the Fire Department** and call the EGLE at (586) 753-3700, or 1-800-292-4706 (the Pollution Emergency Alert System - PEAS). **LARGE SPILLS ARE LIKELY TO PRESENT A SERIOUS HAZARD AND MAY REQUIRE SPILL RESPONSE SERVICES FOR CONTAINMENT AND CLEAN-UP FROM A CONTRACTOR SUCH AS PRO SERVICES of PORT HURON at 24-HOUR HOTLINE: (810) 990-9513.**
8. If possible, clean up spilled material with absorbent pads and floor dry (**do not flush with water**).
9. Dispose of cleaned material/absorbent pads in a secure container for proper disposal.
10. Make sure area is not slippery (if slippery, put down no-slip material)
11. Complete a Spill Reporting Form. If there was a release to waters of the state of any polluting material in excess of the threshold reporting quantities in Part 5 Rules (see Appendix C) the Spill Reporting Form should be sent to the EGLE.

SPILL REPORTING FORM

Date of Incident	
Time of Incident	
Location & Cross Streets	
Type of Spill	
Estimated Quantity	
Reported To	
Time Reported	
Reported By	
Reporter's Address	
Phone Number/Contact	
Additional details about spill:	
Describe materials used to clean up spill:	
Completed By:	

Additional Notes:

If there was a release to waters of the state of any polluting material in excess of the threshold reporting quantities in Part 5 Rules (see Appendix C) this Spill Reporting Form should be sent to: **EGLE, Southeast Michigan District Office, 27700 Donald Court, Warren MI 48092-2793**

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I. INTRODUCTION

Purpose of the Public Education Plan

This collaborative Public Education Plan (PEP) was developed to fulfill the public education requirements of the State of Michigan's National Pollutant Discharge Elimination System (NPDES) Application for Discharge of Stormwater to Surface Waters from a Municipal Separate Storm Sewer System (MS4). This PEP provides an outline of the actions St. Clair County (SCC), its nested jurisdictions and the permittees within the Northeastern Watersheds will take to inform the residents, businesses and officials of St. Clair County about their role in protecting water quality and preventing stormwater pollution in their community. This PEP outlines the ten public education topics that must be communicated, prioritizes them based on a procedure for assessing high-priority community-wide issues, and targets issues to reduce pollutants in stormwater runoff.

The goal for this PEP is to promote, publicize and facilitate a watershed education program that encourages the public to reduce stormwater pollution to the greatest extent possible. The "public" is defined as all persons who potentially could affect the quality of stormwater discharges, including, but not limited to, residents, public employees, businesses, industries, construction contractors and developers.

This PEP was created by SCC, its nested jurisdictions, and the permittees of the Northeastern Watersheds (NEW) Advisory Group who are subject to the aforementioned NPDES stormwater regulations. These permittees will be referred to in the remainder of this document as the "NEW Partners".

Objectives

The following objectives were developed to guide implementation of the Best Management Practices (BMPs) outlined in this PEP:

- Raise awareness and knowledge among the residents of SCC on how their daily activities impact the watershed.
- Educate the public regarding the importance of watersheds as a significant natural resource and community asset by fostering stewardship and enthusiasm for the resource.
- Improve understanding of the impacts of individual and group behaviors on water quality.
- Increase the number of individuals, schools and other organizations participating in water education and stewardship activities.

II. COLLABORATION OF WATERSHED PARTNERS

In developing this PEP, SCC continues its cooperative partnerships with its nested jurisdictions and the NEW Partners, who agree that approaching stormwater education on a watershed and county-wide basis is both efficient and environmentally sound. The collaborative approach provides a consistent and effective mechanism for protecting water resources across the county in the most efficient manner.

Because this plan is collaborative, SCC, its nested jurisdictions and the NEW Partners are all responsible for ensuring its implementation. Currently SCC implements and provides leadership on the majority of the public education activities listed in this plan while its nested jurisdictions and the NEW Partners are responsible for financially supporting these activities, promoting and participating in them. The roles and financial arrangements between SCC, its nested jurisdictions and the NEW Partners are agreed upon annually at NEW Watershed Advisory Group meetings. Should the current roles or financial arrangements change, it is still the responsibility of this collaborative group to ensure that the activities outlined in this plan are implemented.

The following entities are committed to implementing this collaborative plan:

St. Clair County (SCC)

NEW Partners:

- Kimball Township
- Port Huron Charter Township
- East China Charter Township
- Fort Gratiot Charter Township
- Clyde Township
- City of Marine City
- City of Port Huron
- City of Marysville
- City of St. Clair

SCC's Nested Jurisdictions:

- Marysville Public School District
- Port Huron Area School District
- East China School District
- St. Clair County Community College
- St. Clair County Regional Educational Service Agency
- Algonac Community School District

III. REQUIRED PERMIT ELEMENTS

This PEP outlines the program to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants in stormwater to the maximum extent practicable. The PEP describes current and proposed BMPs that will be implemented to meet the minimum control measure required in the permit.

PEP Priority Topics

The public education topics A – J listed in the chart below are identified in the permit application. The procedure for identifying high-priority watershed-wide or targeted topics suited for collaborative public education efforts includes:

- A review of pertinent Watershed Management Plans including any established TMDL (Total Maximum Daily Load: a calculation of the maximum amount of a pollutant allowed to enter a waterbody so that the waterbody will meet water quality standards for that particular pollutant), for waterbodies in each watershed
- A review of the effectiveness of PEP activities implemented prior to this permit cycle
- Topics identified by permittees at advisory group meetings prior to and throughout the permit cycle
- Discussion and input from permittees regarding potential public outreach opportunities, and existing and future programs

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

A measurable goal with a method of evaluation is included for each PEP activity. In addition, for topics A - J the PEP identifies:

- Target audience

- Key message
- Delivery mechanism
- Year and frequency of implementation
- Responsible party
- Evaluation process

IV. OVERALL EVALUATION

This PEP provides the procedure for evaluating and determining the effectiveness of the overall PEP. The procedure includes a method for assessing changes in public awareness and behavior resulting from the implementation of the PEP and the process for modifying the PEP to address ineffective implementation. This method for assessing changes in public awareness and behavior can be completed with surveys to monitor behavioral changes over time. These surveys will be done at public gatherings or through efforts partnering organizations. These surveys need not be statistically valid for use in evaluation of the program.

A variety of mechanisms are described in the “Evaluation” of each of the PEP’s individual activities. Evaluation of accumulated measures of the effectiveness of the PEP’s individual activities can be categorized in terms of output (i.e., effort or activity) that measures short-term goals and milestones. Examples of output measurements include tracking website hits or the number of literature pieces distributed to a target audience. When practicable, measurements of outcome (i.e. survey results that indicate actual behavior change) will be incorporated into progress reports. Such measures are expected to include public comment and feedback and level of participation in programs and events. These mechanisms can be useful in determining whether the education effort is reaching the audience; however, it is difficult to evaluate behavior change resulting from the education activity using these purely quantitative methods.

The final evaluation method to be used will be an ongoing process at the quarterly MS4 (Municipal Separate Storm Sewer System) Advisory Group meetings and members are encouraged to discuss the effectiveness of ongoing efforts and provide suggestions for improvements. If it is determined that a change is needed, the PEP will be revised to reflect the change and the updated on the progress report.

V. PROGRESS REPORT

By the date indicated on SCC and the NEW Partner’s permits, they will submit to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) a Progress Report on the implementation status of its permit and the progress of pollution prevention. This report will include documentation of PEP efforts, a summary of the evaluation of its effectiveness when appropriate (e.g. survey results, public comments received), and any proposed revisions or amendments.

VI. PROPOSED PUBLIC EDUCATION

The activities to be implemented as part of this PEP are summarized below. Activities will be completed by the responsible parties noted in each objective description. Timelines for implementation of proposed activities extend from (year one) when implementation of the PEP begins to (year five) when the permit expires.

(A) Promote public responsibility and stewardship in the applicant's watershed(s).

Activity: Promote watershed awareness at fairs and festivals, collaborate with partner organizations to maintain watershed signage

Priority: High

Target audience: General public, residents, public employees, visitors

Key message: "St. Clair Watershed, Ours to Protect."

Delivery mechanism: Fair and festival attendees, pedestrian traffic, Digital resource packet (distributed through print, social media or website).

Year and frequency of implementation: Signs were replaced in partnership with Friends of the St. Clair River, spring of 2024. They will be maintained indefinitely. Fairs and festivals will be attended 2X per year throughout the permit cycle. One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location.

Responsible party: SCC will attend the events, Nested Jurisdictions and NEW Partners will promote the event(s) through social media or printed signage displayed in a public location.

Evaluation: Document attendance of events and report reach/attendance and materials distributed via progress reports.



(B) Inform and educate the public about the connection of the MS4 to area waterbodies and the potential impacts discharges could have on surface waters of the state.

Activity: Promote Stormwater Education Menu

Priority: High

Target audience: Elementary school students, residents

Key message: Students in a watershed can use BMPs to reduce pollution within our waters.

Delivery mechanism: Presentations

Year and frequency of implementation: Continuous; a minimum of 10 programs will be presented annually throughout the permit cycle.

Responsible party: SCC will provide presentations to the following school districts: Algonac, East China, Saint Clair, Marysville and Port Huron will host the presentations.

Evaluation: A teacher survey will be completed at the end of the presentation.

(C) Educate the public on illicit discharges and promote public reporting of illicit discharges and improper disposal of materials into the MS4.

Activity: Water Quality Tip Line

Priority: High

Target audience: General public, residents, public employees, visitors, schools, businesses, industries, construction contactors, and developers

Key message: Reporting illicit discharges helps keep local waters and the waters of the state clean. If pollutants or dumping is observed, it should be reported.

Delivery mechanism: Promote SCC's 24-hour anonymous Water Quality Tip Line for reporting illicit discharges and pollution problems by placing the phone number and information on websites.

Year and frequency of implementation: Continuous; tip line will be monitored and updated as needed.

Responsible party: SCC will maintain the hotline; SCC, NEW Partners, and Nested Jurisdictions will place the tip line on their websites.

Evaluation: Number of calls, nature of complaints, and follow-up actions will be recorded.

(D) Promote preferred cleaning materials and procedures for car, pavement, and power washing.

Activity: Utilize social media postings

Priority: Low

Target audience: Residents, public employees, schools, businesses, industries, construction contractors, and developers

Key message: Implement BMPs to preserve water quality.

Delivery mechanism: Digital Resource Packet

Year and frequency of implementation: One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location.

Responsible party: SCC will provide the digital resources; Nested Jurisdictions and NEW Partners will post and distribute materials using the social media calendar (see example calendar) and digital resource packet.

Evaluation: Document number of posts/materials distributed and provide analytics when available.

(E) Inform and educate the public on proper application and disposal of pesticides, herbicides, and fertilizers.

Activity: Promote Smiths Creek Landfill and publicize landfill policies

Priority: Medium

Target audience: Residents, public employees, schools, businesses, industries, construction contractors, and developers

Key message: Our county has a universal destination for all waste. Implement BMPs to ensure public safety and environmental sustainability.

Delivery mechanism: Webpage, social media and Stormwater rack cards (contained within the Digital Resource Packet).

Year and frequency of implementation: One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location.

Responsible party: SCC, NEW Partners, and Nested Jurisdictions will post information on website(s).

Evaluation: Website analytics will be provided when available.

(F) Promote proper disposal practices for grass clippings, leaf litter, and animal wastes that may enter into the MS4.

Activity: Utilize social media postings, brochures/flyers, maintain the animal waste disposal dispensers with signage, promote the Educational Program Menu and a possible table top display

Priority: High

Target audience: Residents, visitors, public employees, schools, businesses, industries, construction contractors, developers, and students

Key message: Utilizing proper disposal practices preserves water quality.

Delivery mechanism: Digital Resource Packet, signage, presentations, and display

Year and frequency of implementation: One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location. Animal waste dispensers with signage maintenance is continual. A minimum of 10 programs will be presented annually to students. Displays are available for checkout through the St. Clair County Health Department and should be displayed by NEW Partners 1X per year during the permit cycle.

Responsible party: SCC will provide the digital resources; Nested Jurisdictions and NEW Partners will post and distribute materials. SCC will provide displays; NEW Partners will check out displays and exhibit them. SCC will maintain animal waste signage and dispensers. SCC will provide presentations to the following school districts: Algonac, East China, Saint Clair, Marysville and Port Huron will host the presentations.

Evaluation: Document of number of postings and/or materials distributed. Website analytics will be provided when available. A teacher survey will be completed at the end of the presentation. Location and length of time display is on exhibit will be recorded.

(G) Identify and promote the availability, location, and requirements of facilities for collection or disposal of household hazardous waste, travel trailer sanitary wastes, chemicals, yard wastes, and motor vehicle fluids.

Activity: Promote available Smiths Creek Landfill resources and publicize policies for waste, publicize travel trailer sanitary waste disposal sites, and promote BMPs for yard wastes

Priority: Medium

Target audience: Residents, visitors, and applicable businesses/industry

Key message: Our county has a universal destination for all waste. Implement BMPs to ensure public safety and environmental sustainability. Use BMPs for yard waste and/or contract with services that apply BMPs for yard waste management.

Delivery mechanism: Webpage and Digital Resource Packet

Year and frequency of implementation: Website maintenance is continuous. One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location.

Responsible party: SCC and NEW Partners will display information on their website(s). SCC will provide the digital resources; Nested Jurisdictions and NEW Partners will post and distribute the materials.

Evaluation: Website analytics will be provided when available. Document of number of postings and/or materials distributed.

(H) Inform and educate the public on proper septic system care and maintenance, and how to recognize system failure.

Activity: Utilize brochures, flyers, and social media to inform the public about septic system maintenance; possible table top display

Priority: High

Target audience: Residents, schools, businesses, industries, construction contractors

Key message: Routine maintenance can help prevent system failure.

Delivery mechanism: Webpage and Digital Resource Packet

Year and frequency of implementation: Continuous; website updates will be made as needed. One Digital Resource Packet will be distributed 1X per year during the permit cycle. The Digital Resource Packet's social media calendar will act as a timeline for postings. When social media is not available graphics can be printed and displayed in a prominent location.

Responsible party: SCC and NEW Partners will display information on their websites. SCC will provide the digital resources; NEW Partners will post and distribute the materials.

Evaluation: Website analytics will be provided when available. Document number of postings and/or materials distributed. Location and length of time display is on exhibit will be recorded.

(I) Educate the public on, and promote the benefits of, green infrastructure and Low Impact Development.

Activity: Host information on webpage; possible table to display

Priority: Low

Target audience: Commercial, industrial and institutional sites

Key message: Allowing stormwater to filter through the soil reduces contaminants entering local waterways.

Delivery mechanism: Webpage

Year and frequency of implementation: Continuous; updates will be made as needed.

Responsible party: SCC, NEW Partners, and Nested Jurisdictions will post information on website(s).

Evaluation: Website analytics will be provided when available. Location and length of time display is on exhibit will be recorded.

(J) Identify and educate commercial, industrial, and institutional entities likely to contribute pollutants to stormwater runoff.

Activity: List BMPs and stormwater guidelines on webpage

Priority: Low

Target audience: Commercial, industrial and institutional sites

Key message: Properly dispose of chemicals, toxins, and other products that can negatively impact waterways; follow guidelines when cleaning equipment.

Delivery mechanism: Webpage

Year and frequency of implementation: Continuous; updates will be made as needed.

Responsible party: SCC, NEW Partners, and Nested Jurisdictions will display information on their webpages.

Evaluation: Website analytics will be provided when available.

Example Social Media Calendar:

ST. CLAIR COUNTY HEALTH DEPARTMENT			
STORMWATER			
12-MONTH SOCIAL MEDIA POSTING TIMELINE			
2025			
JANUARY Stormwater Education Programs	FEBRUARY Water Conservation	MARCH Pet Waste World Water Day March 22	
APRIL Ours to Protect Earth Fair	MAY Don't Over Mow Beach Monitoring Starts	JUNE Sturgeon Fest Share Beach Program Water Quality Advisories	
JULY 4H Event Promotion Share Beach Program Water Quality Advisories	AUGUST Share Beach Program Water Quality Advisories Car Washes	SEPTEMBER Septic Smart Beach Monitoring Concludes	
OCTOBER Yard Waste	NOVEMBER Snow and Ice	DECEMBER	

**Posts shown in green will become available closer to the event.

Port Huron Township Facilities & Structural Controls

Facility Name	Address/Crossroads	Located in MS4 or Combined System	Potential for Pollutant Runoff (High, Medium, Low)	Priority Cleaning Schedule
Township Hall	3800 Lapeer Rd.	MS4	Medium	Medium
Township Fire Station	3848 Lapeer Rd.	MS4	Medium	Medium
Public Works Facility	4134 W. Water St.	MS4	High	High
Woodland Cemetery	3800 Lapeer Rd.	MS4	Medium	Medium
Bakers Field Park	Strawberry Ln.	MS4	Medium	Medium
Lion Club Park	Water St./Lapeer I-94 Connector	MS4	Medium	Medium
Memorial Park	Beach Rd.	MS4	Medium	Medium
40 th Street Pond Park	I-69 Business Loop	MS4	Low	Low
Park #5	Michigan Rd./Moak St.	MS4	Low	Low
Hoover School Park	34 th St./Vanness St.	MS4	Low	Low
Little League Park	Michigan Rd./Moak St.	MS4	Low	Low
Township Museum	3800 Lapeer Road	MS4	Low	Low
Water Street Property	Water St./Lapeer I-94 Connector			
1 Township-Owned Catch Basin	3800 Lapeer Road	MS4	High	High
Township-Owned Parking Lots	Throughout Township	MS4	Medium	Medium
0 Township-Owned Retention/Detention Basins	N/A	N/A	N/A	N/A
12 Township-Owned Outfalls	Throughout Township	MS4	N/A	High
XX Septic Systems – Privately Owned	Throughout Township	MS4	Medium	N/A
1 Vegetated Swale	3800 Lapeer Road	MS4	N/A	N/A
1 Oil/Water Separator	4134 W. Water St.	MS4	N/A	Medium
2 Trench Drains	4134 W. Water St./3848 Lapeer Rd.	MS4	Medium	Medium

***Our RV Park has been sold to a private property

Outfall ID	Latitude	Longitude
PHT-1	42.59	-82.28
PHT-4	42.59	-82.26
PHT-5	42.58	-82.25
PHT-6	43.01	-82.29
PHT-7	42.59	-82.29
PHT-7A	42.59	-82.30
PHT-8	42.58	-82.28
PHT-9	42.58	-82.29
PHT-9A	42.58	-82.28
PHT-11	42.56	-82.27
PHT-12	42.56	-82.27
PHT-13	42.58	-82.28

Location	Receiving Water
East Side Storm Sewer; 200 32nd Street	Stocks Creek
Park No. 1; 2270 Water Street	Stocks Creek
Park No. 1; 2270 Water Street	Stocks Creek
Park No. 3; 3342 Beach Road	Black River
DPW Building; 4143 West Water Street	Black River
DPW Building; 4143 West Water Street	Stocks Creek
Township Hall/Fire Station; 3842 Lapeer Road	Stocks Creek
Woodland Cemetery; 3842 Lapeer Road	Stocks Creek
Woodland Cemetery; 3842 Lapeer Road	Stocks Creek
Hoover School Park; 1320 34th Street	Pickard Drain
Hoover School Park; 1320 34th Street	Pickard Drain
WP Thompson Pond Park; 2445 40th Street	Stocks Creek

PROCEDURE ASSESSMENT:

For facilities that have a high potential to discharge pollutants to surface waters of the state, a standard operating procedure (SOP) must be developed for that facility identifying the controls put in place to reduce pollutant runoff. A Storm Water Pollution Prevention Plan (SWPPP) was developed and implemented to track materials stored and operations at the DPW and Fire Station. Bi-annual inspections are performed by the Township Storm Water Operator.

For facilities that have a medium or low potential for the discharge of pollutants to surface waters of the state, each facility was evaluated for the presence of the following factors (63):

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

CATCH BASIN CLEANING & VEGETATED SWALE MAINTENANCE

1. 1 catch basin (owned and operated by the Township) is located in the parking lot at 3800 Lapeer Road (between the Township Office and Fire Station). No prioritization is necessary.
2. The catch basin is inspected by the Township and inspected at least twice per year by the Township's Storm Water Operator.
3. The catch basin will be cleaned when sediment levels reach 40% of the basin holding capacity.
4. Dredge spoils are disposed of at the Woodlawn Cemetery. Catch basin waste is collected and disposed of in the trash.
5. The vegetated swale, located adjacent to the Woodland Cemetery access drive is inspected at least twice per year. The Township is considering installing native plants along the swale to improve drainage and filter any runoff coming from the access drive.
6. The St. Clair County Road Commission maintains County-owned catch basins and streets as necessary.

PAVED SURFACE INSPECTION AND MAINTENANCE:

1. Potential pollutants from operations and maintenance activities include: sediment from parking lots and catch basins, salt utilized on parking lots and sidewalks, and fluids from vehicles and equipment.
2. Visually inspect parking lots and sidewalks annually, preferably in the spring, for sediment buildup, potholes, differential settling/trip hazards, broken concrete, or other defects. Report any potential pollutants to the Stormwater Manager.

MUNICIPAL-OWNED STORMWATER SYSTEM

MUNICIPAL OPERATION AND MAINTENANCE ACTIVITIES DATE: Revised December 2024

3. The Township performs parking lot and sidewalk sweeping as needed by a hand shovel and/or broom. Parking lot and sidewalk dry debris/waste is disposed of in a sealed container and disposed of into a designated trash receptacle for pick-up. We will document the amount of waste disposed of and keep these records on file for a minimum of 3 years.

If an excessive amount of sediment has collected and cannot be properly cleaned by means available to the Township, we will notify the Stormwater Manager and a contractor will be hired to do so. The contractor is responsible for the proper and legal disposal of collected materials off site.

If a contractor will be transporting solid/liquid waste, he must be registered and permitted as a uniform liquid industrial waste transporter under the provisions of the Hazardous Materials Transportation Act, 1998 PA 138, as amended (HMTA). The transporter must notify the Waste and Hazardous Materials Division (WHMD) and obtain a site identification number, follow the instructions and links to the form EQP5150 and pay the associated fee (www.deq.state.mi.us/wdsp). A uniform hazardous waste manifest must be completed and delivered with the load. Manifest documents and procedures can be found on the Michigan Department of Environmental Quality (MDEQ) website (<http://www.michigan.gov/deq/0,1607,7-135-3312-150978--,00.html>). These records must be kept for a minimum of three years after shipment.

The container or portion of the vehicle in which the waste is being carried must be kept closed except when adding or removing the waste. As per MDEQ's "Catch Basin Cleaning Activities Guidance Document" (http://www.michigan.gov/documents/deq/wb-stormwater-CatchBasinGuidance_216198_7.pdf), the facility accepting the waste must meet the following operating requirements.

- They must notify the WHMD that they are operating a liquid industrial waste designated facility, obtain a site identification number, and meet operating requirements under Part 121. This includes practices to prevent unauthorized discharge of the waste, sign manifests, and keep required records. If waste containers are used, they must be kept closed and protected from the weather, fire, physical damage and vandals.
 - The discharge of the liquids into the treatment plant that is permitted by the Water Bureau must meet the wastewater plant requirements. Any other discharges of the liquids would require a separate DEQ discharge permit.
 - The resulting solid waste must be managed under Part 115 requirements. Dispose of the solid waste in a licensed landfill. Contact the landfill authority for their specific disposal requirements, including any tests they require to document the solids are not hazardous or liquid waste. Do not use the solids as fill on local government or private property, or for any other use, unless it meets the conditions of being an inert material according to the solid waste rules R299.4114 through R299.4118. See the Waste Characterization Guidance for information on how to determine if the waste is hazardous or not.
4. For all construction-related repairs, a qualified contractor will be hired. The contractor is required to use methods that will minimize pollutant runoff, including but not limited to the following:
 - a. Using approved soil erosion and sedimentation control (SESC) measures where earth is disturbed.
 - b. Minimize runoff from dust-control water (saw-cutting).
 - c. Install filter fabric beneath the grates at catch basins that receive potentially polluted water due to construction activities.

- d. Sweep/remove and properly dispose of excess construction materials such as cold patch asphalt, sand, gravel and loose concrete.

COLD WEATHER /SEASONAL OPERATIONS:

After snowfall, shovel or plow paved surfaces. Push snow to the edge of pavement without transporting or stockpiling. Snow is stored on grassy areas and re-seeded in the spring.

- 1. Apply salt over paved surfaces where ice has formed or is likely to form. Use only the minimum amount of salt that will be effective to minimize hazards. Assure that any mechanical spreaders used are functioning properly, dispersing the salt uniformly and not in excess.
- 2. 50-lb bags of salt are stored inside the DPW facility.
- 3. Sweep leaves from paved surfaces on a weekly basis, or as needed, during the fall season. Assure that stormwater inlets are free of leaves and debris that may clog them.
- 4. No pesticides other than pre-mixed, ready-to-use products in their original purchased containers shall be applied for the management of vegetated properties.
- 5. Fertilizers are not typically utilized on any of the Township properties.

VEHICLE WASHING AND MAINTENANCE:

- 1. Wash vehicles owned or operated by Port Huron Township periodically (bi-weekly or monthly) and anytime an excess of dirt or other potential pollutant appears to have collected on them in order to minimize the amount of pollutants tracked into Township parking lots.
- 2. Vehicles are washed inside the DPW facility.
- 3. Minimal vehicle maintenance is performed at the DPW and major maintenance is performed off site at private facilities.

OIL WATER SEPARATOR CLEANING & MAINTENANCE

- 1. The oil water separator located at the DPW building is inspected at least twice per year and cleaned out as needed.
- 2. Trench drains are inspected at least twice per year and cleaned out at least twice per year.

PROCESS FOR UPDATING/REVISING THIS PROCEDURE:

This procedure shall be reviewed on an annual basis by the Stormwater Manager for any updates to streamline the requirements. Any questions on this policy and procedure should be directed to the Stormwater Manager. The procedure will be updated within 30 days after any BMPs are added or removed.

**Port Huron Township
2024 MS4 Progress Report
TMDL Work Plan**

Total Maximum Daily Load Implementation Plan – Port Huron Township has a Total Maximum Daily Load (TMDL) for *E. coli* in the Black River.

The known sources of pathogens in the subwatershed include stormwater runoff from urban areas, illicit discharges and connections into the storm sewer system, sanitary sewer and combined sewer overflows, other wastewater treatment issues (e.g., septic systems). Suspected sources of pathogens include wildlife, pet waste, and possible sediment resuspension related to altered hydrology.

E. coli TMDL Priorities – The Township has identified and prioritized the following ongoing and future activities to address TMDL pollutant reduction for *E. coli*:

1) The following information is posted on the Township website and in newsletters:

- Pet Waste
- 24-Hour SCCHD Pollution Hotline
- SEMCOG Protect Our Waterways
- RV Waste

2) Wet Weather E. coli Sampling/Monitoring:

Wet weather investigations will be conducted at 6 outfall locations (50%) in 2024. Wet weather samples will be collected during a rain event where there is anticipated discharge.

Methods of effectiveness will be developed following lab analysis. Wet weather samples will be collected during a representative rain event (i.e., >0.25” and <1.5”) over a 24-hour period and within 30-60 minutes of the start of the wet weather event in order to capture first flush.