

**CITY OF EAST LANSING
STORM WATER MANAGEMENT PROGRAM**

**IMPLEMENTATION PLAN
FOR COMPLYING WITH THE
NPDES PERMIT REQUIREMENTS**

2. NESTED MS4 DISCHARGES

UPDATED JANUARY 2020

INTRODUCTION

Overview:

This section of the “Implementation Plan” is intended to serve as the primary guidance document for the Nested Jurisdictions portion of the Storm Water Management Program. This section was originally developed to provide a general overview of the requirements outlined in the City of East Lansing’s NPDES Permit No.MI0059327 which became effective June 2015. The Implementation Plan was subsequently reviewed and updated to reflect any changes to the new NPDES Permit which becomes effective February 1, 2020.

In particular, this section addresses Part I, Section A. 1. b “Nested MS4 Discharges” which states *“This permit authorizes the discharge of storm water to surface waters of the state from a nested MS4 owned or operated by public bodies that include, but are not limited to, public school districts; public universities; airports; or county, state or federal agencies. The permittee is responsible for the permit requirements for the nested MS4s associated with the following public bodies and identified in the application submitted by the permittee: East Lansing Public Schools.”*

2015 Original Implementation Plan:

The 2013 application for the NPDES Permit included a list of nine facilities owned and/or operated by the East Lansing Public School District.

At a meeting on July 29, 2015 and per an e-mail dated September 25, 2015, the East Lansing Public School District officials indicated their preference to continue to be nested under the City of East Lansing’s MS4 NPDES permit.

The Engineering staff prepared a draft document entitled “Interagency Agreement for Coverage Under the Phase II NPDES Permit” to document the school district’s intent to remain nested and to outline the responsibilities of the City and the School District in complying with the conditions of the permit. The agreement was approved by both parties and formally signed on December 14, 2016. Per the agreement, the School District will also actively participate in the implementation of the Public Participation/Involvement Process and the Public Education Plan portions of the City’s SWMP.

2017 Updated Implementation Plan:

The interagency agreement states that the School District agrees to abide by the requirements established by the City in accordance with the NPDES Permit and the City of East Lansing’s Storm Water Management Plan.

The primary mechanism for implementing and evaluating the school district’s compliance with the NPDES permit is through having incorporated their facilities in the City’s implementation

plan for "Pollution Prevention & Good Housekeeping Activities for Municipal Operations". As such, each of the nested facilities will be inspected, a list of potential pollutants onsite will be noted, and the appropriate BMPs to be followed will be determined. Each nested school facility will be formally reinspected at least once a year to verify compliance with the BMPs. The nine facilities were originally reviewed, evaluated, and inspected in November and December 2016 and included in the City's 2016 Good Housekeeping annual program.

2020 Updated Implementation Plan:

The 2020 NPDES Permit did not modify any of the Nested MS4 requirements or result in any changes to the previous Implementation Plan.

Training:

The City will require the school district's appropriate staff member(s) to complete training in the various aspects of the SWMP. To that end, the City will invite school district staff to attend or participate in various training sessions conducted or established by the City. The school district employees and their contracted employees received their first training in 2016.

Removal of Nested Facilities:

If at any time the school district wishes to be removed from the City's SWMP as a nested facility, the City will submit a written notice to MDEQ for their review and approval.

Implementation & Tracking:

A checklist encompassing the various aspects and requirements for complying with the Nested Jurisdiction requirements of the NPDES Permit has been developed for use on an annual basis. Individual checklists were also developed for each of the nine facilities for use during the annual inspection of each facility.