

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

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

**1. STORM WATER MANAGEMENT
PROGRAM OVERVIEW**

UPDATED JANUARY 2020

INTRODUCTION

Overview:

This “Implementation Plan” is intended to serve as the primary guidance document for the City of East Lansing’s Storm Water Management Program. The implementation plan 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. 3. “Storm Water Management Program (SWMP)” which states *“The permittee submitted a SWMP with its application for an NPDES permit. The SWMP is approved as submitted. The permittee shall implement the approved SWMP to comply with the minimum requirements identified in this permit. The SWMP shall cover the area served by, or otherwise contributing to discharges from, the MS4 owned or operated by the permittee identified in the application, including nested MS4s. The permittee shall implement and enforce the SWMP to reduce the discharge of pollutants from the MS4s to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the NREPA and the Federal Act. The approved SWMP is an enforceable part of this permit and any Department approved modifications made to the SWMP shall also become enforceable parts of this permit.”*

Implementation Plan Details:

The City originally developed its Implementation Plan as a means to help ensure that the requirements stipulated in its 2015 NPDES Permit were adequately addressed. The plan has subsequently been updated to reflect any changes noted in its current 2020 NPDES Permit as well as any changes that reflect improvements learned from five years of continued use and experiences.

The plan has been divided into the following sections to address the specific requirements of the various sections of the permit as denoted:

1. Storm Water Management Plan Overview (Part I, Section 3.)
2. Nested Jurisdictions (Part I, Section A.1.b.)
3. Permitted Outfalls (Part I, Section A.1.a and Section 2.)
4. Enforcement Response Plan (Part I, Section A,3.a)
5. Public Participation/Involvement Process (Part I, Section A,3.b)
6. Public Education Program (Part I, Section A,3.c)
7. Illicit Discharge Elimination Program (Part I, Section A,3.d)
8. Construction Storm Water Runoff Control Program (Part I, Section A,3.e)
9. Post-Construction Storm Water Runoff Program (Part I, Section A,3.f)
10. Pollution Prevention and Good Housekeeping Activities for Municipal Operations (Part I, Section A,3.g)

11. Total Maximum Daily Load (TMDL) Implementation Plan (Part I, Section A,3.h)

Sections 2 through 11 of this Implementation Plan include a discussion of the requirements noted in the 2020 NPDES Permit; reference to previously approved plans or programs submitted with the recent NPDES Application; the City's plans and procedures for implementing, monitoring and evaluating the permit requirements for each item; and various checklists and forms for ensuring and tracking the City's progress in implementing the SWMP.

A brief overview of sections 2 through 11 is as follows:

2. Nested Jurisdictions (Part I, Section A.1.b)

This section acknowledges the East Lansing Public School District's intent to have nine of their facilities remain as nested facilities under the City's NPDES Permit. An inter-agency agreement outlining the conditions under which the City and School District agreed to cooperate and actively participate in the activities necessary to enable both the City and the School District to comply with the Phase II Regulations and the NPDES Permit was signed on December 14, 2016. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis. Individual checklists were also developed for each of the nine facilities for use during the annual inspection of each facility.

3. Permitted Outfalls (Part I, Section A.1.a and Section 2.)

This section outlines the procedures to be followed when a new outfall or point of discharge to the waters of the state is identified, constructed, or installed within the City's MS4 regulated areas. This section also discusses the requirements for establishing discharges for both public MS4 and private outfalls and points of discharge as well as for obtaining authorization from MDEQ for MS4 discharges. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis.

4. Enforcement Response Plan (Part I, Section A.3.a)

This section acknowledges the City's ability to enforce the requirements of their NPDES through ordinances and other regulatory mechanisms. This section of the Implementation Plan also acknowledges the City's plan for tracking violations and enforcement actions associated with the following programs: Item #7- Illicit Discharge Elimination Program; Item #8- Construction Storm Water Runoff Control Program; Item #9- Post Construction Storm Water Runoff Program; and Item #10- Pollution Prevention and Good Housekeeping Activities for Municipal Operations.

5. Public Participation/Involvement Process (Part I, Section A.3.b)

This section acknowledges the City's efforts to encourage public participation and involvement in their Storm Water Management Plan (SWMP). The City has identified three primary resources for disseminating information concerning aspects of the SWMP and soliciting comments and suggestions: 1.) the City's website; 2.) the City's Commission on the Environment; and 3.) the City Council. A checklist was developed to

ensure that the conditions of this section are reviewed on an annual basis and that progress in implementing the PPP is tracked.

6. Public Education Program (Part I, Section A.3.c)

This section highlights the City's efforts in conjunction with the GLRC PEP Committee to develop a formal Public Education Plan that promotes, publicizes, and facilitates public education. The goal is to achieve measureable improvement in the public's understanding of storm water pollution and how they can be part of the effort to reduce the impacts of storm water pollution. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis and that progress in implementing the many aspects of the PEP are tracked.

7. Illicit Discharge Elimination Program (Part I, Section A.3.d)

This section provides an overview of the IDEP plan that was originally approved in April 2008 and the subsequent annual inspection program that has been established. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis and that progress associated with the IDEP is tracked. Violations associated with the IDEP requirements are also tracked on an annual basis.

8. Construction Storm Water Runoff Control Program (Part I, Section A.3.e)

This section addresses the City's ability to meet the NPDES requirements regarding storm water runoff control by means of its existing Soil Erosion and Sedimentation Control Program. This section also acknowledges the City's role and limitations as an MDEQ Authorized Public Agency and Municipal Enforcing Agent pursuant to Part 91 Rules. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis. Violations associated with the Construction Site Water Runoff Control Program are also tracked on an annual basis.

9. Post-Construction Storm Water Runoff Program (Part I, Section A.3.f)

This section acknowledges the City's efforts to meet the rigorous NPDES requirements for Post Construction Storm Water Runoff through the development of the City of East Lansing's "Post Construction Storm Water Guidance Manual". The manual consists of three sections: Chapter I- Post Construction Stormwater Management Ordinance; Chapter II- Stormwater Policy & Procedures Manual; and Chapter III- Stormwater Design Manual. A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis and that progress in implementing the Post-Construction requirements is tracked. Violations associated with the Post Construction Storm Water Runoff Program are also tracked on an annual basis.

10. Pollution Prevention and Good Housekeeping Activities for Municipal Operations (Part I, Section A.3.g)

This section addresses the City's program to ensure pollution prevention and good housekeeping activities adhere to the proper BMPs. The section discusses the City's adoption of the GLRC's "Good Housekeeping and Pollution Prevention for Municipal Facilities" manual. The manual includes 14 specific BMPs for addressing "Fixed Facilities" and 8 specific BMPs for addressing DPW "Field Operations".

A listing of all City owned or operated fixed facilities, as well as the nested facilities, is provided.

All fixed facilities were evaluated to determine a rating (low, medium or high) as to each facility's potential to discharge pollutants to the waters of the state. Two facilities were identified as having a "high" potential- the State Road DPW Facility and the City of East Lansing's Water Resource Recovery Facility. A comprehensive Stormwater Pollution Prevention Plan was developed for the State Road DPW Facility as well as a Pollution Incident Prevention Plan and a Spill Prevention Control and Countermeasures Plan. The Water Resources Recovery Facility has its own NPDES Permit and is exempt under this MS4 NPDES Permit. However, a PIPP has been developed and implemented at the WRRF.

An information data sheet was developed for each facility and the appropriate BMPs to be adhered to at each facility was established. In addition, an inspection form was developed for each facility to be used in conducting an annual onsite inspection of each facility in order to verify compliance with the specified BMPs.

A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis and that progress in implementing the Pollution Prevention and Good Housekeeping requirements is tracked. Violations associated with the Pollution Prevention and Good Housekeeping Activities Program are also tracked on an annual basis.

11. Total Maximum Daily Load (TMDL) Implementation Plan (Part I, Section A,3.h)
This section addresses the City's obligation to make progress in meeting the Water Quality Standards established by the State. In particular, the City must address E.coli limits within the Red Cedar River Watershed.

The section discusses the basis for, and procedures established within the City's approved Total Maximum Daily Load Implementation Plan. In particular, the plan outlines the scheduling and testing for E.coli during rainfall events.

A checklist was developed to ensure that the conditions of this section are reviewed on an annual basis and that progress in achieving the reduction of E.coli to the Red Cedar River Watershed can be tracked and evaluated.

Additional specific details concerning each of the SWMP sections are included therein as well as details concerning training, monitoring, evaluation/effectiveness of the program, etc....

Also as noted above, we have developed a checklist for most sections to be completed annually. The primary purpose of the checklists is to ensure that the requirements of the NPDES Permit are reviewed at least annually and that the City has the information needed to properly review, evaluate and, if necessary to modify the elements of its program. The checklist will also help provide information that can be used to prepare the required progress reports to MDEQ.