

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

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

**10. POLLUTION PREVENTION
& GOOD HOUSEKEEPING
ACTIVITIES FOR
MUNICIPAL OPERATIONS**

UPDATED JANUARY 2020

INTRODUCTION

Overview:

This section of the "Implementation Plan" is intended to serve as the primary guidance document for the Pollution Prevention and Good Housekeeping 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 Section A. 3. g "Pollution Prevention and Good Housekeeping Activities for Municipal Operations" which states "*The permittee shall implement the pollution prevention and good housekeeping program with the goal of preventing or reducing pollutant runoff from municipal facilities and operations that discharge storm water to surface waters of the state. The permittee shall implement the program as part of the SWMP to the maximum extent practicable.*"

2015 Original Implementation Plan:

The program incorporates the materials provided in the application for the NPDES which constitutes the City's official Storm Water Management Plan.

2017 Updated Implementation Plan:

The nine facilities formally included under the nested jurisdiction interagency agreement with the East Lansing Public School District were incorporated into the annual inspections following the issuance of the 2015 NPDES Permit.

Where applicable, updates and modifications to the original materials have been made and new materials added.

MDEQ Audit:

An audit of the City's Pollution Prevention and Good Housekeeping Program was conducted by EGLE on May 24, 2017. No issues were noted with the City's Pollution Prevention and Good Housekeeping plan or program.

2020 Updated Implementation Plan:

The 2020 NPDES Permit did not modify any of the Pollution Prevention and Good Housekeeping Activities for Municipal Operations MS4 requirements or result in any changes to the previous Implementation Plan.

Pollution Prevention & Good Housekeeping Program:

The information has been organized in accordance with the following outline:

- I. POLLUTION PREVENTION AND GOOD HOUSEKEEPING ACTIVITIES FOR MUNICIPAL OPERATIONS- FIXED FACILITIES
 - Overview
 - Individual facility data sheets prepared for each facility
 - Specific BMPs assigned to each facility
 - Individual inspection sheets prepared for each facility

- II. STANDARD OPERATING PROCEDURES FOR FACILITIES RATED AS HAVING A “HIGH” POTENTIAL OF DISCHARGING POLLUTANTS TO WATERS OF THE STATE
 - Overview
 - State Road DPW Facility
 - City of East Lansing Water Resource Recovery Facility (WRRF)

- III. POLLUTION PREVENTION AND GOOD HOUSEKEEPING ACTIVITIES FOR MUNICIPAL OPERATIONS- FIELD PROGRAMS
 - Overview
 - BMPs applicable to field operations
 - Street Sweeping Program
 - Sewer Cleaning Program
 - Catch Basin Cleaning Program
 - Management of Vegetated Properties

- IV. STRUCTURAL STORM WATER CONTROL FACILITIES
 - Overview
 - Individual facility data sheets prepared for each facility
 - Specific BMPs assigned to each facility
 - Individual inspection sheets prepared for each facility

- V. IMPLEMENTATION AND EVALUATION
 - Staff Training
 - New Facilities
 - Site Inspections
 - Enforcement
 - Recordkeeping
 - Evaluation/Effectiveness of the Program
 - Reporting

The two City owned or operated facilities which are rated as having a “high” potential for discharging pollutants to the waters of the state are addressed in separate documents. A comprehensive Stormwater Pollution Prevention Plan (SWPPP) has been developed and is being

implemented for the State Road DPW Facility. This plan was submitted as part of the City's NPDES application and as such is part of the City's official Storm Water Management Plan.

A comprehensive Pollution Incident Prevention Plan (PIPP) has been developed and is being implemented at the City's Water Resource Recovery Facility under their own NPDES Permit. As such, the WRRF is not regulated under the MS4 NPDES Permit.

I. POLLUTION PREVENTION AND GOOD HOUSEKEEPING ACTIVITIES FOR MUNICIPAL OPERATIONS-FIXED FACILITIES

This section is prepared in compliance with Part I, Section A. 3. g. of the City's 2015 NPDES Permit. The program was developed in accordance with the "Good Housekeeping and Pollution Prevention for Municipal Facilities" manual prepared by the GLRC Ordinance Committee, September 2007.

The City of East Lansing owns several parcels of properties throughout the City as shown on the attached listing and map. The listing was updated in 2019 to reflect parcels which are no longer owned by the City and parcels which have been redeveloped into a different type of use.

The listing includes a column indicating the rating for each facility that reflects the potential for that facility to discharge pollutants to the surface waters of the state. The listing of fixed facilities has been separated into seven categories by use.

Each facility was inspected and then an individual facility data sheet was prepared for each site. The sheet includes the following information:

- Facility Type & Location: name of the facility; address; type of facility; location; watershed/subwatershed into which it drains; utility map; and whether the site is adjacent to or drains to an environmentally sensitive area.
- Facility Activities & Pollutants: type of activities that exist at the facility; list of types potential pollutants and significant materials as identified in the Good Housekeeping and Pollution Prevention for Municipal Facilities manual; specific chemicals or pollutants of concern stored on site; and a rating (high, medium or low) as to the potential for the discharge of pollutants of concern to the stormwater system.
- BMPs Identified to Prevent or Reduce Pollutant Runoff at the Facility: a listing of specific BMPs to be applied at each site is provided from the fourteen "Municipal Fixed Facility BMPs" provided in the Good Housekeeping and Pollution Prevention for Municipal Facilities manual.
- Inspections: a schedule of inspections and identification of the responsible party for routine oversight of the facility. In addition, the actual compliance inspection form to be used for that facility is noted.

Table 3-1 of the Good Housekeeping and Pollution Prevention for Municipal Facilities manual identified 14 BMPs (SC-1 thru SC-14) which could be applied to fixed facilities.

In 2005, a new DPW facility was constructed at 1800 E. State Road. The facility was designed with the intent that all vehicle fueling, cleaning, and repairs would be done at the DPW facility only. As such, the following BMPs apply to the DPW Facility only:

- SC-3 Vehicle and Equipment Fueling

- SC-4 Vehicle and Equipment Cleaning
- SC-5 Vehicle and Equipment Repair

Likewise, the following BMPs apply primarily to the DPW Facility but may also have very limited application to some other fixed facilities if so indicated:

- SC-6 Outdoor Loading/Unloading
- SC-7 Outdoor Container Storage
- SC-8 Outdoor Equipment Maintenance
- SC-9 Outdoor Storage of Raw Materials

The grounds maintenance activities at all of the City owned and operated sites, with the exception of the soccer complex, are performed by DPW staff and crews. As such, practices related to mowing, maintaining plantings, disposal of debris, etc... are all uniformly conducted throughout the City and training is provided by the DPW administration.

As part of the City's Stormwater Management Program, the City has established a comprehensive Illicit Discharge Elimination Plan (IDEP) and identified all discharges to the various waters of the State. As part of the IDEP program, all discharges are inspected on a five year rotation during dry conditions to detect possible non-stormwater connections. As such, BMP SC-1 Non-Stormwater Discharges is primarily monitored and enforced under the IDEP program for all public and private properties within the City.

As such, the following remaining BMPs will be applied to the various individual fixed City facilities where appropriate:

- SC-2 Spill Prevention, Control and Cleanup
- SC-10 Waste Handling and Disposal
- SC-11 Building and Grounds Maintenance
- SC-12 Parking/Storage Area Maintenance
- SC-13 Housekeeping Practices
- SC-14 Safer Alternative Products

In evaluating the various fixed facilities, consideration is given to the fact that a large portion of the City is served by combined sewers. This includes most of the Municipal Buildings, the Parking Structures, and Surface Parking Lots. Thus, pollutants washed into these combined sewers will normally undergo treatment at the City of East Lansing's Water Resource Recovery Facility.

CITY OF EAST LANSING FIXED FACILITIES

	<u>RATING FOR POTENTIAL TO DISCHARGE POLLUTANTS</u>
<u>PUBLIC BUILDINGS:</u>	
1. City Hall	Low
2. Public Library	Low
3. Abbot Road Fire Station	Low
4. Hannah Community Center	Medium
<u>DPW FACILITIES:</u>	
1. State Road DPW Facility	High
2. Ground Storage& Pumping Facility- Hagadorn Road	Low
3. Wastewater Treatment Plant	High
<u>PARKING STRUCTURES:</u>	
1. Grove Street Garage	Low
2. Charles Street Garage	Low
3. Division Street Garage	Low
4. Bailey Street Garage	Low
5. MAC Avenue Garage	Low
6. Albert Avenue Garage	Low
<u>PARKING- SURFACE LOTS:</u>	
1. Albert/Abbot Parking Lot	Low
2. Bailey Parking Lot	Low
3. City Hall Parking Lot	Low
4. City Hall West Parking Lot	Low
5. Evergreen Avenue Parking Lot	Low
6. CVS Parking Lot	Low
<u>SPORTING COMPLEXES:</u>	
1. Softball Complex	Low
2. Family Aquatic Center	Medium
3. Soccer Complex	Low

PARKS:

1. Hawk Nest Park	Low
2. Abbot Road Park	Low
3. Abbey Road Park	Low
4. Henry Fine Park	Low
5. Tamarisk Park	Low
6. Harrison Meadow Park	Low
7. Albert A White Memorial Park	Low
8. Patriarche Park	Low
9. Burcham Park	Low
10. Valley Court Park	Low
11. Emerson Park	Low
12. Stoddard Park	Low
13. Norman Foster Smith Park	Low
14. Oak Park	Low
15. Ehinger Park	Low
16. Northern Trail Dog Park	Low
17. Wolf Court Park	Low
18. Hidden River Park	Low
19. Shaw Water Tower	Low
20. Musselman/Ledebuhr Welcome Park	Low
21. Glencarin Park	Low
22. Glenhaven Park	Low
23. Forest Park	Low
24. City Park @ Hannah Community Center	Low
25. City Park @ Bailey Community Center	Low
26. Shaw Park	Low
27. Northern Tier Trails	Low

EAST LANSING PUBLIC SCHOOL FACILITIES:

1. Donley Elementary	Low
2. Glencarin Elementary	Low
3. Marble Elementary	Low
4. Pinecrest Elementary	Low
5. Red Cedar Elementary	Low
6. Whitehills Elementary	Low
7. MacDonald Middle School	Medium
8. East Lansing High School	Medium
9. Towar Community Center	Low

INSERT MAPS HERE

II. STANDARD OPERATING PROCEDURES FOR FACILITIES RATED AS HAVING A “HIGH” POTENTIAL FOR DISCHARGING POLLUTANTS TO WATERS OF THE STATE

As noted in Section I, two facilities are rated as having a “HIGH” potential for discharging pollutants to the waters of the State: 1.) the State Road DPW Facility and 2.) the City of East Lansing Water Resource Recovery Facility.

Per Section A.3.g.2) of the NPDES Permit *“The permittee shall implement the facility-specific standard operating procedure (SOP) for each facility the permittee identified as having the high potential to discharge pollutants to surface waters of the state.”*

Accordingly, the City developed a “Storm Water Pollution Prevention Plan (SWPPP)” for the State Road DPW Facility. The SWPPP was developed in accordance with the requirements identified in MDEQ’s Industrial Storm Water Permit Program. The State Road DPW Facility SWPPP was included as part of the 2013 NPDES Application and as such is part of the City’s official SWMP. The SWPPP was updated in May 2015. The SWPPP was prepared in conjunction with the City’s “Pollution Incident Prevention Plan (PIPP)” required by MDEQ and the “Spill Prevention Control and Countermeasures Plan (SPCC)” required by USEPA. All three documents are on file at the DPW Offices.

The appropriate BMPs outlined in the Good Housekeeping and Pollution Prevention for Municipal Facilities manual are included as an integral part of the overall comprehensive SWPPP for the State Road DPW Facility.

The City also developed a “Pollution Incident Prevention Plan (PIPP)” for the Water Resource Recovery Facility (WRRF) in accordance with Part 3 of Act 451 of the State of Michigan. The PIPP was updated in October 2015. BMPs outlined in the Good Housekeeping and Pollution Prevention for Municipal Facilities manual are included as an integral part of the overall PIPP for the City of East Lansing’s Water Resource Recovery Facility. The WRRF’s storm water management is regulated under its own separate NPDES Permit.

III. POLLUTION PREVENTION AND GOOD HOUSEKEEPING **ACTIVIITES FOR MUNICIPAL FIELD PROGRAMS**

This section is prepared in compliance with Section A.3.g.4) and 5) of the City’s 2015 NPDES. The program was developed in accordance with the “Good Housekeeping and Pollution Prevention for Municipal Facilities” manual prepared by the GLRC Ordinance Committee, September 2007.

The City of East Lansing’s streets; water distribution system; storm, sanitary and combined sewer collection systems; solid waste collection and disposal services; landscape maintenance; cleaning and maintenance of sidewalks, plazas, and fountains; and other infrastructure is maintained by the Department of Public Works and Environmental Services.

Eight BMPs were developed as part of the good housekeeping manual to address the work associated with the normal municipal field programs established to operate, maintain and repair the various aspects of the City’s infrastructure. The pollution prevention recommendations; suggested protocols; operational policies and procedures; and other considerations for an effective BMP are reviewed and implemented by one of the DPW Divisions and overseen by one of the DPW Administrators as follows:

1. BMP: SC-15 Road and Street Maintenance
Division: Street Division
Administrator: Infrastructure Administrator
2. BMP: SC-16 Salt Application and Storage
Division: Street Division
Administrator: Infrastructure Administrator
3. BMP: SC-17 Plaza and Sidewalk Cleaning
Division: Parks Maintenance Division
Administrator: Environmental Services Administrator
4. BMP: SC-18 Fountains & Pools Maintenance
Division: Parks Maintenance Division
Administrator: Environmental Services Administrator
5. BMP: SC-19 Landscape Maintenance
Division: Parks Maintenance Division
Administrator: Environmental Services Administrator
6. BMP: SC-20 Drainage System Maintenance
Division: Sewer Division
Administrator: Infrastructure Administrator
7. BMP: SC-21 Waste Handling and Disposal
Division: Sanitation Division
Administrator: Environmental Services Administrator

8. BMP: SC-22 Water and Sewer Utility Maintenance
Division: Water Division & Sewer Division
Administrator: Infrastructure Administrator

The DPW Administrator specified for each BMP is responsible for the following requirements for implementing the BMPs:

- Training the staff assigned to the particular work.
- Providing the technical expertise to oversee the work.
- Evaluating the effectiveness of the BMPs and making changes or modifications as needed.

In conjunction with the general BMPs discussed above, the DPW has developed specific guidelines for the following municipal operations and maintenance activities:

Salt Storage & Application: All salt and deicing materials are stored at the State Road DPW Facility. The storage and control of those materials is discussed extensively in the SWPPP, PIPP and SPPCC documents for that facility.

In accordance with BMP SC-16 “Salt Application and Storage”, the City has actively pursued a program of calibrating its trucks and evaluating the usage of salt. This has resulted in a significant reduction in the use of salt and deicing materials.

Street Sweeping Program: The Street Division of the Department of Public Works follows a program of street sweeping that is based on such factors as traffic volumes, development characteristics (commercial, apartments, residential neighborhoods, etc...), field observations of sediment and trash accumulation, etc... as suggested in BMP SC-15 “Road and Street Maintenance”.

In the downtown areas and student areas of East Lansing, litter and not pollutants may be the overriding factor in scheduling street sweeping. To a large extent street sweeping in the City’s downtown district is regulated by the litter generated during certain times of the year and certain university driven events (MSU football games, festivals, etc...). The schedule can be adjusted as necessary to account for unusual circumstances such as storm events, construction activity, etc...

The same principal of basing the work effort to actual need rather than arbitrary schedule is followed in determining the frequency for cleaning parking lots, sidewalks, plazas and other impervious infrastructure.

In general, residential neighborhoods are swept 4 to 5 times per year; major and arterial streets are swept 6 to 7 times per year; and the Downtown Grand River area and other highly trafficked areas are swept even more often.

All materials collected by the street sweepers are disposed of at the Public Works Facility at a designated waste disposal site. The waste is dewatered and then transported to a

landfill for ultimate disposal. The waste disposal site is described in detail in the State Road DPW SWPPP.

Catch Basin Cleaning Program: The most significant structural storm water control measures used within the City are the individual catch basins (over 3,000). The specific location of the individual catch basins is maintained on the City of East Lansing's storm sewer atlases on file in the Engineering Division. The atlases are updated as new private developments are completed and as City initiated projects are completed. The individual catch basins along streets designated as "major" streets are normally cleaned at least once a year by City crews using a Vactor. All other catch basins are cleaned at least once every two years. If complaints are received from citizens as to a catch basin not working, the Sewer Division investigates and clears the obstruction (e.g. leaves and twigs).

BMP SC-20 "Drainage System Maintenance" discusses the proper procedures for cleaning catch basins. All materials extracted from the catch basins are disposed of at the Public Works Facility at a designated waste disposal site. The waste is dewatered and then transported to a landfill for ultimate disposal. The waste disposal site is described in detail in the State Road DPW SWPPP.

As part of the normal cleaning process, the individual catch basins are inspected for any structural defects. If any defects are found, they are addressed immediately.

Management of Vegetated Properties: The City follows the general procedures outlined in BMP SC-19 "Landscape Maintenance". However, the City of East Lansing does not apply pesticides using City personnel. All pesticide application is performed by an outside contractor to the City. The City requires that all contractors and the employees applying any pesticide be properly certified and licensed in the State of Michigan.

IV. STRUCTURAL STORM WATER CONTROL FACILITIES

Section I.A.3. g.3)b) of the 2015 NPDES Permit states “*The permittee shall implement the procedures for inspecting and maintaining permittee-owned or operated structural storm water controls other than catch basins in the regulated area. The permittee shall document changes to procedures as part of the progress report and as an update to the procedure.*”

As such, the City must commit to inspecting all structural controls at City facilities and assure that they are being maintained in accordance with the proper BMPs.

The Public Works Facility is served by two storm water detention basins, several catch basins, two oil/grease interceptors and other various structural controls as described in detail in the State Road DPW Facility SWPPP. The proper operation, maintenance, inspection and other requirements regarding these structural controls is outlined in detail in the SWPPP.

The City of East Lansing Water Resource Recovery Facility is served by several containment areas, catch basins and other various structural controls as described in detail in the WRRF’s PIPP. The proper operation, maintenance, inspection and other requirements regarding these structural controls is outlined in detail in the WRRF’s PIPP.

The City also has constructed wetlands on Abbot Road north of the Aquatic Center; a retention basin serving the Aquatic Center on Abbot Road; a detention basin serving the soccer complex on Coleman Road; a Stormceptor on Coleman Road west of Coolidge Road; a Stormceptor serving the Maynard Professional Center; and a Stormceptor at the discharge to the Red Cedar River at the corner of Michigan Avenue and Harrison Road . These six sites are considered the City’s Offsite Storm Water Control Facilities.

Guidelines for the design and construction of specific structural storm water control devices are included in the City of East Lansing’s Post-Construction Storm Water Control-Design Manual.

The City has prepared an information data sheet for each of the six off-site structural storm water control facilities similar to the data sheets prepared for the fixed facilities. The data sheets contain the following information:

- Type of facility
- Address
- Location
- Watershed/subwatershed into which it drains
- Site Utilities
- Whether the site is adjacent to or drains to an environmentally sensitive area
- List of potential pollutants that may be discharged from the stormwater system
- Listing of specific BMPs to be applied at each site
- Responsible party for routine oversight of the facility
- A schedule of inspections

In addition, a compliance inspection form specific to each facility has been created to record and track the inspections and log any follow-up actions taken.

V. POLLUTION PREVENTION AND GOOD HOUSEKEEPING ACTIVITIES FOR MUNICIPAL OPERATIONS- IMPLEMENTATION AND EVALUATION

In order to properly implement and evaluate the effectiveness of the City's pollution prevention and good housekeeping activities, the following items must also be included in the program:

- Effective training of municipal and contract employees working in both fixed facilities and field programs.
- Regular inspections of fixed facilities, field programs and treatment controls.
- Follow-up action to correct deficiencies in BMP implementation noted during inspections.
- Accurate recordkeeping to track training, inspections, monitoring and BMP maintenance.

A. Training:

The City acknowledges that education and training is critical to the success of the BMP implementation plan. As noted previously, the work associated with pollution prevention and good housekeeping activities for municipal operations, both fixed facilities and field programs, is performed largely by DPW staff members. The DPW staff is under the direct supervision of either the Infrastructure Administrator or the Environmental Services Administrator. Each Division as noted in Section II also has a designated lead worker. Where appropriate, additional onsite City employees assigned to the individual facilities may also be asked to attend training sessions.

Training is a regular function of the DPW. Training may include internal training sessions, seminars, webinars, videos and other sources. The level of training may also vary as needed from Administrator to lead worker to general staff employees. However, the City acknowledges the requirements of Section A.3.g.6) of the NPDES Permit which states "*The permittee shall implement the employee training program to train employees involved in implementing pollution prevention and good housekeeping activities. As a minimum, existing staff shall be trained once during the permit cycle and new hire employees within the first year of their hire date.*"

The DPW Administrators are responsible for establishing the training programs to assure proper implementations of the BMPs and recordkeeping associated with those training efforts.

Periodically outside contractors are used to assist in field programs associated with sewer repairs, water repairs and other functions. In those instances, copies of the City's applicable BMPs will be provided to the contractors. In addition, DPW staff from engineering or the appropriate DPW Division will normally be overseeing the work of the outside contractors.

- B. New Facilities: The City acknowledges and will comply with Section I.3.A.g.3)c) of the NPDES Permit which states *“The permittee shall implement the procedures requiring that new permittee-owned or operated facilities or structural storm water controls to address water quantity be designed and implemented in accordance with the post-construction storm water runoff performance standards and long-term operation and maintenance requirements in Part I.A.3.f of this permit.”*

The City has developed the “City of East Lansing Post-Construction Stormwater Management Guidance Manual”. Chapter I is the Post-Construction Stormwater Management Ordinance. Chapter II is the Stormwater Policy and Procedures Manual. Chapter III is the Stormwater Design Manual. The City will follow the various policies, procedures and design guidelines established therein.

New facilities will be included and tracked as part of subsequent annual checklists.

- C. Site Inspections:

The lead workers and general staff employees performing their routine duties at fixed facilities and during normal field programs are responsible for complying with the BMPs on an ongoing basis. In addition, the appropriate DPW Administrators make periodic unscheduled site inspections.

As noted in Section I, each fixed facility has been assigned specific BMPs which they must comply with. A formal comprehensive onsite inspection will be made annually at each facility to verify compliance with those BMPs. Specific inspection forms have been prepared for use at each individual facility. These annual inspections will normally be made by the Engineering staff, appropriate DPW Administrators, lead workers where required, and if necessary an onsite City employee from the facility.

Inspections of field programs include spot checks of field activities being performed and interviews with key staff. No formal inspection forms or schedules have been established for field programs. These inspections are conducted by the appropriate DPW Administrators.

Likewise contracted activities are spot checked by the appropriate DPW Administrators and onsite inspectors. No formal inspection forms or schedules have been established for contracted activities.

- D. Enforcement:

As part of the training for BMPs, City employees are advised that all BMPs must be adhered to, to the extent practicable. Failure to follow established standard operating procedures can

result in employee disciplinary actions such as verbal warnings, written warnings, or even more serious disciplinary actions.

External enforcement procedures which pertain to municipal contractors may be undertaken by the DPW Administrators in accordance with the conditions of their contract.

E. Recordkeeping:

Training and Workshops- The subject matter; an outline of the materials covered; and the employees in attendance at the internal training sessions conducted at the City should be kept on file. For external training, the name of the workshop/training; the name of the sponsoring organization; a general description of the subject matter; location and date of the training; and attendee information is kept on file.

Site Inspections- If periodic inspections reveal that specific BMPs are not being adhered to, a description of the violation and the actions taken to correct the noncompliance should be noted and placed on file. A "Violation Report" form has been developed to be used with fixed facilities and field programs. The violation form includes areas to track actions taken to correct the violations. Violations at fixed facilities will be kept in each individual fixed facility's file and violations of field programs will be kept in their appropriate files.

Field Programs- Records of field activities such as sewer cleaning; catch basin cleaning and repairs; water main repairs; street sweeping; etc...is maintained by the DPW staff. Much of that information is incorporated into the City's GIS data base. The information is used to determine the appropriate level of effort and effectiveness of the activities.

F. Evaluation/Effectiveness of the Program:

The effectiveness of the fixed facilities portion of the program is measured largely by the number of violations noted during periodic inspections of fixed facilities and field programs and the annual comprehensive inspections of each fixed facility.

In addition, the effectiveness of the field programs can be measured by the City's ability to complete the predetermined levels of maintenance activities such as feet of sewers cleaned and/or televised; number of catch basins cleaned; miles of street swept; etc....

G. Reporting, Implementation & Tracking:

The following documents have been developed to help measure and ensure compliance with the IDEP requirements of the NPDES Permit:

- Checklists encompassing the various aspects and requirements of the Pollution Prevention & Good Housekeeping Program has been developed for use on an annual basis for both fixed facilities and the six Offsite Storm Water Control Facilities.

- A Summary of BMP Violations- Fixed Facilities form and a Summary of BMP Violations- Municipal Operations form have been developed for tracking noncompliance.
- An Employee Training Form to track GLRC sponsored training, in-house training- etc....