



NPDES Ph II Permit requirements

It is good to go back and revisit the basics sometimes. It reminds us why we do what we do. The National Pollution Discharge Elimination System (NPDES), was created to reduce/ eliminate pollutants from entering our surface waters. Under the Ph II permits this is done through 6 elements.

They are: (1) public participation, (2) public education, (3) illicit discharge elimination plan (IDEP), (4) soil erosion and sediment control, (5) post construction controls, and (6) operation and maintenance. The remainder of this memo will clarify permit obligations for each of these elements.

Public Participation

The NPDES stormwater permit requires that the public be involved and provide input into all policy documents and major implementation decisions. Your permit application has specific commitments that you made to involve the public.

Public Education

The public education requirements are laid out on Table 2 of the Permit application. There are many public education efforts being performed on your behalf by GCDC staff and our partners including the Flint River Watershed Coalition and the Genesee conservation district, but the permit also requires specific requirements from the permittee. Each permittee is going to make their own commitments but it is suggested at a minimum, to make available the information from the Genesee County Community Water Quality Consortium (chaired by the Drain Commissioner's Office of Surface Water Management, or SWM) <http://www.cleargeneseeewater.org/default.htm>. This includes the *Seven Simple Steps* brochure and other literature. Provide links on your website to the above website and other storm water education. Have an Illicit discharge reporting mechanism. Provide Staff training on Good housekeeping and IDEP identification. Other storm water education efforts.

Illicit Discharge Elimination Plan (IDEP)

The Drain Commissioner's Office of Surface Water Management administers the County's IDEP program. Your responsibility is to have maps available of your stormwater drainage system for all your facilities and institutions and to report any significant hazardous spills that have reached the municipal separate storm sewer system (MS4). If there is an illicit discharge and if it is suspected to emanate from a property under your jurisdiction or within your community, you will be contacted to arrange for further investigations on your property. Financial responsibility of any subsequent testing and removal of a confirmed illicit connection would be the responsibility of you as the permittee on any MS4's that you own and operate. On private or 3rd party discharges, the cooperation of you Community, the County, the State and other agencies that are responsible under the law would work together to eliminate the illicit discharge.

Soil Erosion and Sediment Control (SESC)

Whenever construction occurs on a District property, the State mandates that steps must be taken to manage soil erosion and the sediment generated by these activities. Permittees are obligated to follow the County's Enforcement Agency or if you have your own program the Municipal Enforcement Agency SESC program when construction occurs and should have a written policy stating this. Each Permittee is also responsible for notifying 3rd party development in your Community about the Michigan Permit by Rule Program.

The County's requirements can be found at: <http://www.gcdewws.com/images/contentImages/file/mcl-451-1994-II-2-SOIL-CONSERVATION-EROSION-AND-SEDIMENTATION-CONTROL-91.pdf> Each Permittee is also responsible for notifying 3rd party development in your Community about the Michigan Permit by Rule Program.

Post-Construction Stormwater Controls for New Development and Redevelopment

All new construction and redevelopment occurring on Municipal property must follow your permit application standards for the management of stormwater post-construction. The intent of these standards is to reduce water quantity and potential flooding, as well as reduce the level of pollutants entering local waterways. Please contact the Surface Water Management Department of the Drain Commissioner's office as your first step in the design process.

Operations and Maintenance

The GCDC is offering a site visit for your facilities from Tetra tech to go over your operations and Maintenance procedures in regards to Stormwater. There were four points considered: (1) An inventory of all your institutions and facilities documenting the potential sources of pollution for each, (2) current management practices, (3) the presence of a Stormwater Pollution Prevention Plan (SWPPP) on site for all your facilities, and (4) a stormwater manager for the district. There is also Staff education available on the GCDC-SWM website at http://www.gcdcswm.com/PhaseII/SWPPI_SWO/SWPPI_SWO.htm

Tetra Tech: Contact Stephen Pennington, Ph.D 517-316-3958
GCDC Office: Contact Susanne Hogan, Drain Engineer 810-732-1590
It is our hope to be a valuable resource to you.