

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

GENERAL PROCEDURES

CITY OF BELLEVILLE
6 MAIN STREET
BELLEVILLE, MICHIGAN 48111



APRIL 2017

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable to prevent or reduce the discharge of pollutants from municipal facilities and operations.

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

City of Belleville owned and operated facilities have been assessed for their potential to discharge pollutants to the waters of the state. Each facility was evaluated based on the following criteria:

1. Amount of urban pollutants stored at the site (i.e. sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, or other site-specific pollutants)
2. Identification of improperly stored materials
3. Potential for polluting activities to be conducted outside (i.e. vehicle washing)
4. Proximity to waterbodies
5. Poor housekeeping practices
6. Discharge of pollutants of concern to impaired waters

Based on these criteria, the potential for each facility to discharge pollutants to the waters of the state were rated high, medium, or low. For **“low” priority facilities** where no assessment factors are present, catch basin cleaning and street sweeping will be performed as indicated in the applicable procedures for these activities. For **“medium” priority facilities**, appropriate BMPs are considered based on the assessment factors present to prevent or minimize the potential for pollutants from entering surface waters of the state. **“High” priority facilities** have specific procedures in place in order to ensure that proper steps are followed in order to minimize and prevent the discharge of pollutants to storm water from the site.

SECTION C– UPDATES AND PRIORITY REVISION

This inventory shall be updated within 60 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments shall be revised within 60 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

The following table identifies the City of Belleville’s owned or operated facilities with a discharge of stormwater to surface waters of the state. **Table 1** includes a list of properties owned or operated by the City of Belleville that has stormwater controls on site and provides the estimated number of stormwater structural controls (i.e. catch basins, detention basins, etc.) at each site, along with the priority level of potential discharge of pollutants to waters of the state. An up-to-date map(s) showing the location of the facilities and structural storm water controls is available at the DPW Director’s office located in City Hall at 6 Main Street.

Table 1: City of Belleville or Operated Properties with Stormwater Controls

Facility Name	Structural Controls	Priority Level	Assessment Factors	BMP's Implemented
DPS Yard 370 E. Columba Belleville, MI 48111	Catch Basins (1) Dumpsters (5) Salt Structure (1) Stockpiles (6)	High	1	See Section E
City Hall 6 Main Street Belleville, MI 48111	Catch Basins (3)	Low	1	Parking lot sweeping when needed

In addition to the properties in Table 1, the City of Belleville also owns other property/lots with no structural stormwater controls. These include:

City Parks located within the City limits

SECTION E –SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a standard operating procedure (SOP) for identifying the structural and non-structural stormwater controls implemented and maintained to prevent or reduce pollutant runoff at each facility with the high potential for pollutant runoff.

E.1 Inventory and Description of Materials and Activities

The City of Belleville Department of Public Works (DPW) operations are conducted at their facility at 1370 E. Columbia Avenue. Based on the site assessment for the DPW yard this site is considered high priority due to the following operations:

DPW Facility – 370 E. Columbia Avenue

- Storm water catch basin
- Salt Storage
- Stockpiled materials
- Dumpsters for different materials

Site specific standard operating procedures have been developed for the City of Belleville DPW Yard and are included as a separate document. Please see the Standard Operating Procedures – City of Belleville DPW Yard Standard Operating Procedures.

SECTION F –CATCH BASIN MAINTENANCE PRIORITY

Catch basins that are inspected and maintained by the City of Belleville will not be prioritized for routine inspection, maintenance, and cleaning.

Currently, the majority of the City of Belleville’s catch basins are not need of maintenance and are of low priority. If a complaint comes in on a catch basin the DPW staff will investigate to see what may need to be done. If the City work force can clean the basin they will do so. If a basin is in need of more than just simple cleaning the City will hire an outside contractor to clean out those basins that are in need of maintenance. The City does not have any high priority areas for catch basin cleaning.

Catch basins that prompt resident complaints or are subject to isolated instances where structures are plugged or damaged will be maintained and inspected by DPW Staff as needed. At that time, it will be determined if the catch basin will require maintenance on a more frequent interval and warrants a reclassification to a higher priority rating. In the event the priority rating of a catch basin is changed, or new catch basins are constructed, this procedure will be updated and revised to reflect the change in priority within 60 days.

SECTION G – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING

Catch basins are visually inspected during normal work activities or if a complaint is registered by a resident. A visual inspection of the structure will identify any structural defects which may include collapse, cracking, frame damage, pipe collapse, blockage, etc. and will be documented using a standardized form. Catch basin structures in need of structural repairs are identified during the inspection and regular maintenance process based on the results of visual assessments conducted by

the City of Belleville work force. Structure repairs are prioritized based on review of the structure and public safety concerns. If cleaning is required the City of Belleville DPW will hire an outside contractor to remove the material from the pipe and catch basin. At no time is collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. Catch basins that are located on private property are not inspected, cleaned, or maintained by the City of Belleville.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of catch basins repaired/cleaned

These metrics will be tracked over the reporting cycle that is specified in the City of Belleville’s Certificate of Coverage.

SECTION H – DISPOSAL OF COLLECTED MATERIAL

Since most of if not all major catch basin cleaning is handled by an outside firm it is the responsibility of that firm hired by the City to dispose of the water and material collected from the catch basins.

As for street sweeping activities, the City of Belleville has a designated roll off dumpster that is used for the collection of street sweepings. This dumpster once loaded is hauled away by the City collection company to a designated landfill.

SECTION I –STREET SWEEPING PRIORITIZATION

City of Belleville owned and maintained streets/parking lots are not prioritized for street sweeping.

The City is broken up into two sections with each section being swept during the non-winter months on an every other week basis.

If the City of Belleville DPW receives a complaint, a determination of the area will be made by DPW staff on whether to increase sweeping on a more frequent interval as well as a reclassify the area to higher priority rating. In the event a priority rating is changed, or new City of Belleville owned streets are constructed, this procedure will be updated and revised to reflect the change in priority within 60 days.

Street sweeping activities are conducted by the Belleville DPW staff using sweeper in accordance with manufacturer’s operating instructions. Collected sediment from street sweeping activities is disposed of as described in Section H.

- Street sweeping is not conducted on County or State roads
- Sweeping activities are not conducted during wet and inclement weather
- Street sweeping activities is not conducted on private streets, private parking lots, uncurbed streets

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Summary of frequency of street sweeping, or total miles swept

These metrics will be tracked over the reporting cycle that is specified in the City of Belleville's Certificate of Coverage.

SECTION J – OTHER STRUCTURAL STORMWATER CONTROLS

In addition to implementing the catch basin maintenance and street sweeping programs, the City of Belleville also. The City also performs inspections of open ditches during routine work days.

J.1 Open and Enclosed Drain Inspections

The routine procedure for open drains consists of the inspection of the inlet grates for blockages during any given day of the week. If an issue arises and the ditch that may need maintenance will be taken care of if it is owned by the City. In the event that the ditch maybe owned by the County the City of Belleville will contact the County and tell them of the issues that were uncovered.

The City of Belleville does not have any other structural controls that are owned or maintained by the City. In the event additional structural stormwater controls are constructed, this procedure will be updated and revised to include the new controls within 60 days.

Measureable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of inspections of storm water controls as identified above
- Number of problems identified
- Number of problems resolved

These metrics will be tracked over the reporting cycle that is specified in the City of Belleville's Certificate of Coverage.

SECTION K – NEW APPLICANT OWNED FACILITIES

In the event the City of Belleville acquires or constructs new structural stormwater controls, the design of these structures will comply with the stormwater standards that have been established by Wayne County. Site plans will be reviewed by the City of Belleville, or its consultants, to ensure the appropriate standards are met.

SECTION L – CERTIFIED PESTICIDE APPLICATOR

The City of Belleville DPW Department does not have a certified pesticide applicator on staff and does not apply or store pesticides or fertilizers. In the event the application of pesticides or fertilizers is needed, the City of Belleville retains the services of a licensed applicator.

The City of Belleville DPW Department does not have a certified pesticide applicator on staff and does not apply or store pesticides or fertilizers, but utilizes the services of a licensed applicator (see Section N – Contract Requirements and Oversight).

SECTION M – EMPLOYEE TRAINING

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices. The City of Belleville participates in training opportunities that are made available by SEMCOG, Wayne County, the Alliance of Downriver Watersheds, and others as deemed appropriate. Employee training components for the City of Belleville DPW Department includes:

Employees Trained	Training Description and Frequency
New DPW Employees	Upon hire, employees will: <ul style="list-style-type: none"> • View the Municipal Storm Water Pollution Prevention Storm Watch training video. • Read and become familiar with the City’s SOPs. • Participate in a job shadow program where new staff is paired with an experienced staff member for 30 days.
All DPW Field Employees	Annually, employees will: <ul style="list-style-type: none"> • View the Municipal Stormwater Pollution Prevention Storm Watch training video. • Review proper materials storage and handling. • Review good housekeeping and pollution prevention practices. • Review examples of illicit discharges to the storm sewer system • Review City Spill Response Procedures
Key staff	Once per permit cycle: <ul style="list-style-type: none"> • Attendance of key staff to relevant training workshops by the Alliance of Downriver Watersheds, Wayne County, SEMCOG, MDEQ, or others, when available.

Measurable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of new employees trained
- Number of existing field employees trained
- Number of key staff trained

These metrics will be tracked over the reporting cycle that is specified in the City of Belleville’s Certificate of Coverage.

SECTION N – CONTRACT REQUIREMENTS AND OVERSIGHT

The contractors hired by the City of Belleville to perform municipal operations that potentially impact stormwater are required to follow appropriate pollution prevention BMPs indicated in the City of Belleville’s contract language. In cases where an outside contractor is hired to perform services that could impact stormwater, the contracting company will be required to follow appropriate pollution prevention BMPs. All work performed by outside contractors are monitored by City of Belleville staff

through daily observation to ensure quality of work, adherence to the specified contract language, and to ensure that potential impacts to stormwater are minimized.

Measurable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of stormwater pollution related incidents pertaining to activities or work performed by the contractor.
- Number of incidents where the City of Belleville required corrective action by the contractor

These metrics will be tracked over the reporting cycle that is specified in the City of Belleville's Certificate of Coverage.

SECTION O – PROCESS FOR REVISION

This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirements.