

Northville Public Schools



STORMWATER MANAGEMENT PROGRAM PLAN

April 14, 2008



Northville Public Schools

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Prepared for

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Stormwater Management Program Plan

1.0 Introduction

Northville Public Schools (NPS) will strive to be good stewards of the land within their jurisdiction and to use appropriate Best Management Practices (BMPs) to contribute to the improvement of water quality within the Huron River and Rouge River Watersheds where they are located. Northville Public Schools (NPS) is committed to practicing sound stormwater management practices and to observance and adherence to all local, state and federal stormwater rules and regulations.

Northville Public Schools owns and operates thirteen (13) public facilities located within the boundaries of the “Detroit Urbanized Area” and is subjected to permitting under the Phase II regulations. Permitted facilities include both secondary and elementary schools, as well as, administrative and maintenance facilities which are serviced by municipal separate storm sewer systems (MS4s). A map identifying each facility, local municipal boundaries, school district boundaries, and associated watershed information is provided in attachment “A”.

This revised and updated “Stormwater Management Program Plan” (SWMP) has been developed to clarify statements and outline policies, procedures, best management practices (BMPs), and implementation schedule in response to a letter received from the Michigan Department of Environmental Quality, Water Bureau dated February 6, 2008.

The following SWMP has been developed in accordance with Part I Section B and Part I Section C.1.a. of NPDES General Jurisdictional Permit number MIS040000 (Stormwater Discharges from Municipal Separate Storm Sewer Systems (MS4s) With Controls Based on Six Minimum Measures) and the accompanying Certificate of Coverage No. MIS040078 issued to Northville Public Schools on May 7, 2007. The SWMP is designed to reach specific goals regarding discharge of pollutants from NPS stormwater systems and properties into the Middle 1 sub-watershed of the Rouge River. The ultimate goal in implementing the plan is to decrease discharge of pollutants to the Maximum Extent Possible (MEP) and to protect the waters of the State of Michigan in compliance with requirements of the Federal and Michigan regulations.

NPS has created a “Stormwater Management Program” team comprised of key department managers and facilitators to develop and implement the components of this SWMP. The stormwater management team currently includes Mr. Dave Bolitho, Assistant Superintendent of Operations; Ms. Mary Kay Gallagher, Assistant Superintendent for Instruction; Mr. Chris Gearns, Director of Operations; Mr. John Boganowski, Transportation Coordinator; Mr. Kevin Cavanaugh, Custodial Coordinator; Ms. Robin Taksony, Food Services Manager; Ms. Anne Proulx, Director of Technology; and Ms. Janice Henderson, Curriculum Facilitator.

This Stormwater Management Team will meet regularly to review activities identified in the SWMP, discuss progress toward plan implementation, and identify deficiencies or improvements to be included. The team members will be responsible for individual task oversight and documentation of task status and/or completion, and coordination of tasks with other staff and faculty members. Team

members will be added or replaced as necessary during the term of the permit to ensure that all NPS departments are represented and accountable for implementation and continued progress toward measurement and achievement of goals established in this SWMP.

2.0 Stormwater Management Program Plan Requirements

Municipal Separate Storm Sewer System (MS4) controls are based on development and implementation of Best Management Practices (BMPs) to address each of the tasks identified as part of the following Six Minimum Management Measures:

- Public Education and Outreach Program (PEP)
- Public Involvement and Participation Program (PIP)
- Illicit Discharge Elimination Program (IDEP)
- Post Construction Stormwater Management Program for New NPS Development and Redevelopment of any NPS Properties.
- Construction Site Stormwater Runoff Control Program
- Pollution Prevention/Good Housekeeping for NPS faculty and staff.

2.1 Public Education Program (PEP)

Northville Public Schools (NPS) public education program is designed to promote, publicize, and facilitate education for the purpose of encouraging the public to reduce the discharge of pollutants into the separate stormwater system. The term “**Public**” is defined to include all persons who potentially could affect the quality of stormwater discharges at NPS properties including but not limited to NPS faculty, staff, contractors, visitors and students of NPS, as well as residents, visitors to the area, public employees, businesses, industries, construction contractors and property developers.

Although some of the designated tasks outlined in the PEP may not apply specifically to public school facilities, NPS is dedicated to work with the individual communities and other watershed groups to assist in the development of educational materials and mechanisms to promote these materials throughout the communities.

2.1.1 Public Education Program (PEP) Objectives

Permit Task Description

- a. Educate the public about the hazards associated with illicit discharges.
- b. Educate the public to encourage reporting of illicit discharges
- c. Establish a public hotline for reporting illicit discharges
- d. Educate residents about the waterbody where their storm water goes
- e. Educate the public about waste collection and recycling sites
- f. Educate the public about appropriate use of herbicides, pesticide, and fertilizers

- g. Educate the public about residential and non-commercial car washing
- h. Educate the public about proper septic system maintenance
- i. Educate the public on management of riparian lands to protect water quality
- j. Educate the public about their responsibility and stewardship in their watershed
- k. Educate the public about the water quality impacts from residential de-icing
- l. Educate the public on the beneficial uses of native vegetation as an alternative to turfgrass
- m. Educate local commercial, industrial, and educational facilities about good housekeeping
- n. Educate commercial food service business owners regarding grease and litter control

Northville Public Schools is committed to providing educational programs to the community members in whom we serve. NPS is working in conjunction with the City of Northville, Northville Township, the Friends of the Rouge, the Oakland County Drain Commissioners (OCDC) Environmental Department, Wayne County DOE, and the Alliance of Rouge Communities (ARC) in addition to ongoing curriculum programs to provide environmental protection, pollution prevention, and watershed awareness educational information to students, staff, faculty, and community residents at large. Throughout the term of the permit it is anticipated that a combination of educational approaches will be used to convey the individual components of the PEP. Educational mechanisms will include items such as but not limited to: addition of watershed specific education topics to science and media classes, distribution of community and/or solid waste authority newsletters, cable TV programs or ads, school newsletters, development of a “Stormwater” webpage on the districts website, and use of the “Seven Simple Steps to Clean Water” program posters/brochures/display boards to be strategically placed throughout the school system.

In addition to supporting existing area wide programs, each of the required elements will be addressed at least annually on “Stormwater Awareness” page on the NPS district website.

2.1.2 Public Education Plan Program Elements

Existing public education efforts and anticipated future efforts for each of the required elements are described below:

a,b,c,d. Educate the public about the hazards associated with illicit discharges; Educate the public to encourage reporting of illicit discharges; Establish a public hotline for reporting illicit discharges; Educate residents about the waterbody where their goes

Existing Effort:

NPS staff has completed and initial review of current curriculum and investigating options for the addition of topics in science classes. NPS staff is also conducting workshops and training sessions to provide education about stormwater issues including emphasis on identification and reporting of illicit discharges for employees of the district.

NPS faculty and staff have been actively involved in providing a variety of watershed and pollution awareness education curriculum in grades K-12 throughout the district. These curricula include coursework covering a wide variety of topics including natural resource conservation, recycling, environmental impacts, water quality, groundwater & surface water systems, illicit discharge impacts to the watersheds, and local watershed investigation programs. A listing of current grade level curriculum topics including grade level, description, additional activities, and current level of participation is provided in “Table 1-Watershed Awareness and Pollution Prevention Curriculum BMPs”.

NPS elementary students are currently using a modular science program developed by the Battle Creek Area Mathematics and Science Center. Development of this program was funded through a grant program by the Kellogg Foundation and created in conjunction with BCAMSC and teachers from 17 other school districts throughout Michigan. These groups have combined their expertise, knowledge and enthusiasm for science instruction to create a kindergarten through sixth grade inquiry focused science curriculum. The curriculum is aligned with local, state, and national standards and includes Unit/Kits for physical science, earth science, and life science. Teacher Guides, Student Journals, materials, and trade books are provided in each Unit/Kit.

The goals of the Unit/Kit program are to:

- Provide good, inquiry-focused science instruction in the classroom, grades Kindergarten through 6th.
- Make science instruction easier.
- Provide Unit/Kits aligned with the Michigan Curriculum Framework and National Science Education Standards.
- Improve implementation of science instruction.
- Increase science background knowledge for elementary teachers
- Provide the materials necessary for successful science activities in the classroom.

NPS Secondary students are provided with additional curriculum that expands on the studies gained at the elementary level. Studies include watershed specific experiences including participation in the “Rouge Education Project” in association with the Friends of the Rouge, 7th Grade Hydrosphere curriculum, and high school Earth Science, MI Natural Resources, AP Environmental Science courses. Each of these curricula offer students both class room and field studies of the environment including the local watersheds. Faculty, staff, and students work in cooperation with local communities and watershed groups to collect water quality data, develop natural habitats, and assist in identifying adverse human impacts to the environment including local watersheds.

Future Effort:

NPS is aware of the Oakland County Drain Commission’s 24-hour environmental hotline telephone number and the Wayne County Environmental Departments 24-hour hotline telephone number, and will include posting of these numbers at each facility, posting on the NPS stormwater website, as well as notification of students and their families through the districts newsletter. Staff will be working with the City of Northville, Northville Township, Wayne County Environmental Department, and Oakland County Drain Commissioner’s Environmental Department, along with other community and watershed groups to identify ways to promote/expand these efforts in NPS

and/or as part of the NPS Illicit Discharge Elimination Plan. NPS will also coordinate with each of the local communities and county environmental departments to implement a system for the reporting and recording of illicit connections or discharges. NPS will implement strategies and measurable goals to identify and correct existing and/or potential illicit discharge points as part of the IDEP.

NPS will continue to educate staff, faculty, and students using various venues including educational workshops and training sessions, along with use of the “Seven Simple Steps to Clean Water” program brochures, posters, and educational boards placed throughout the school district.

The NPS stormwater team is reviewing current curriculum to include a survey to assess students’ awareness of the watersheds and impacts throughout the district. This survey will be continued in future classes to track students’ progress towards achieving the goals outlined in this plan as well as determining the effectiveness of the program and address any weakness areas identified by the surveys.

e, f, g, . Education of the public on the availability, location and requirements of facilities for the disposal or drop-off of household hazardous waste, travel trailer sanitary wastes, chemicals, grass clippings, leaf litter, animal wastes, and motor vehicle fluids.

Existing Effort:

NPS has contacted the City of Northville, Northville Township, Wayne County, and the Oakland County Drain Commissioners (OCDC) Environmental Department to assist in development and/or distribution of training materials and mechanisms to educate the public in regard to these issues. NPS is also working with SEMCOG, Alliance of Rouge Communities (ARC), The Rouge Project, Wayne County Environmental Department, and Oakland County Drain Commission to provide educational and training materials for use throughout the district.

Future Effort:

NPS will provide for inclusion of advertisement of local household hazardous waste collection events sponsored by local communities along with general chemical and waste management practices on the “Stormwater” webpage located on the districts website. This information will include links to the SEMCOG “Ours to Protect” website as well as other information deemed appropriate to convey these messages.

In addition, staff will also work to identify potential information gaps and investigate opportunities, other mechanisms, and information for better promoting the water quality benefits associated with the proper handling and disposal of hazardous materials and other pollutants. Staff will review in house training programs and update them as necessary to include watershed awareness and SWMP activities. NPS will continue to educate staff, faculty, and students using various venues including the “Seven Simple Steps to Clean Water” program brochures, posters, educational boards and other educational materials developed by the various watershed groups specifically related to these issues.

h, i, j, k, l, m, n. Educate the public about appropriate use of herbicides, pesticide, and fertilizers; Educate the public about residential and non-commercial car washing; Educate the public about proper septic system maintenance; Educate the public on management of

riparian lands to protect water quality; Educate the public about their responsibility and stewardship in their watershed; Educate the public about the water quality impacts from residential de-icing; Educate the public on the beneficial uses of native vegetation as an alternative to turfgrass; Educate local commercial, industrial, and educational facilities about good housekeeping; Educate commercial food service business owners regarding grease and litter control

Existing Effort:

NPS has contacted representatives from the City of Northville, Northville Township, Wayne County Environmental Department and the Oakland County Drain Commissioners (OCDC) Environmental Department in an effort to identify opportunities to coordinate activities, develop training materials, and determine the appropriate mechanisms to provide information within NPS and to assist the communities in educating the public at large in regard to these issues.

NPS is committed to increasing awareness of the local watersheds and pollution prevention throughout the community. NPS continues to provide watershed awareness and pollution prevention curriculum programs and topics at all grade levels from K-12. A complete listing of current curriculum or topics is provided in Table 1 “Watershed Awareness Curriculum BMPs” which includes a description of topics, grade level, additional activities and current number of students involved.

NPS Faculty, students, and parent volunteers are currently involved in the “Rouge Education Project” through Friends of the Rouge. The Rouge Education Project not only tests rivers to determine the water's health, but also prescribes "treatment" or courses of action. Students, teachers and citizens team up to develop plans to improve the quality of the river. This component provides another opportunity for experience beyond the typical classroom setting. NPS will continue to support efforts through the Friends of the Rouge and continue involvement if the Rouge Education Project.

Future Effort:

NPS is aware of efforts and educational materials put forth by the Friends of the Rouge’s “Rouge Education Project”, and SEMCOG’s “Ours to Protect” program including the “Seven Simple Steps to Clean Water” posters, tip cards, and brochures. Over the term of the Permit and as watershed planning occurs, staff will work with these groups (and others) as much as possible to identify and implement opportunities, mechanisms, and additional information for educating the public on these issues.

NPS will continue to work allied with SEMCOG, the Friends of the Rouge’s “Rouge Education Project”, and the Oakland County Drain Commissioners Environmental Department to research other methods of education for students, faculty, staff, visitors, and other associated citizens. Schools in NPS system will continue to participate as possible in the “Rouge Education Project” and other watershed education and participation opportunities. Students that participate in particular watershed quality activities may receive a badge or certificate or other acknowledgement from the NPS teacher/facilitator. Students would be able to wear the badge and share what they’ve learned

with community or family members, thus carrying the educational component out and into the community.

NPS will encourage the public to explore and learn more about water quality and volunteer opportunities by Rouge River related website links to the NPS district website. NPS will promote the use of the “Seven Simple Steps to Clean Water” program by including posters, brochures, and educational handouts in NPS facilities as well in including this material as part of the NPS “Stormwater” webpage.

2.1.2.1 Table 1 -Watershed Awareness and Pollution Prevention Curriculum BMPs

Level	Description of Curriculum	Additional Activities	Number of Participants
K	Kindergarten curriculum impacts student awareness of what makes up their earth: sand, soil, pebbles, water and air. Students do a series of activities that cause them to interact with these materials, so they can better understand the impact students have on earth materials.		Curriculum: 470
1 st	1 st grade curriculum includes specific benchmarks which include demonstrations of natural resource conservation and recycling, discussion and experiments on the “3 stages of water”, and tracing the path of rainwater. These topics include art projects, hands on experiments, and visual observations in an effort to increase students awareness of their environment		Curriculum: 505
2 nd	2 nd grade curriculum introduces students to the concept that the earth continuously changes. Landforms and bodies of water experience the effects of weathering and erosion.		Curriculum: 520
3 rd	3 rd grade curriculum introduces students to the term “Watershed” as it relates to the downward migration of stormwater within the watershed. They learn about groundwater, surface water, sources of drinking water, the effects of pollution on the watersheds and importance of caring for water.		Curriculum: 570
4 th	4 th grade curriculum studies the concepts of <i>Reduce, Recycle</i> and <i>Reuse</i> . Students learn that humans can have a positive or negative effect on water quality and the environment. They collaboratively make a compost pile and do a series of investigations to understand the benefits of it.		Curriculum: 550
5 th	5 th grade curriculum provides specific watershed education experiences including participation in the “Rouge Education Project” which collects watersheds data to be shared throughout the watershed. Students create mini-ecosystems where they combine the terrarium with aquariums to study the interaction between them and learn how fragile the earth is. They learn how to discard hazardous waste and debate land management issues.	Rouge River Water Festival, Friends of the Rouge & “REP” water quality tests; developed a natural habitat area in cooperation with the City of Northville; land use research projects; effects of run-off from construction sites, etc.	Curriculum: 565 Activities: 190

Level	Description of Curriculum	Additional Activities	Number of Participants
7 th	7 th grade Hydrosphere curriculum includes studies on ecology and the environment. Course work includes use of natural resources, pollution, and the effects of human populations on the environment. Activities include ecological succession, pond studies, predictions, and laboratory studies.	Collect Rouge River water samples and complete a 2 day lab that helps determine water quality; study runoff and storm drains and the impact on our watershed.	Curriculum: 540 Activities: 230
HS-Earth Science	The Earth Science curriculum impacts student understanding of the interaction between the major systems of the earth, how water quality in both groundwater and surface systems is impacted by human decisions, and how groundwater systems and how the sustainability of North American aquifers has changed in recent history.	Turn the drainage basin lot into a Schoolyard habitat through the National Wildlife Federation.	Curriculum and Activities: 420
HS-MI Natural Resources	Michigan Natural Resource curriculum involves students in the study of wetlands and their ability to absorb excess water to prevent flooding, toxic substances and their effect on the environment, habitat management, and how wetlands are natural purifiers of water.		Curriculum and Activities: 85
HS-AP Environmental Science (APES)	APES is an interdisciplinary college level course. The focus is on relationships of the natural world, natural and human-made environmental problems and relative risks associated with resolving or preventing environmental crisis. Biodiversity, endangered species, water and air quality, demographics, energy resources and environmental toxicology are covered. Students participate in various lab experiences.	Field studies, collections, and sampling on the abiotic and biotic characteristics of the Rouge River and compare the data with local storm water retention ponds. Students also survey of the surrounding drainage basins, streams, and runoff patterns.	Curriculum and Activities: 55

2.1.3 Stakeholders, individuals, and organizations contacted in the process of preparing the Public Education Plan.

- NPS staff, students and families
- SEMCOG
- Cathy Milberg, Friends of the Rouge
- Noah Mehalski, Rouge Education Project
- Jennifer Wolf, Huron River Watershed Council
- Jim Gallagly, City of Northville Department of Public Works
- Jill Rickert, Northville Township
- Amy Ploof, Oakland County Drain Commission, Environmental Department
- Mr. Dave Bolitho, NPS Asst. Superintendent of Operation
- Ms. Mary Kay Gallagher, NPS Asst. Superintendent for Instruction
- Mr. Chris Gearn, NPS Director of Operations
- Ms. Anne Proulx, NPS Director of Technology
- Ms. Janice Henderson, NPS Curriculum Facilitator
- Mr. Kevin Cavanaugh, NPS Custodial Coordinator
- Mr. John Boganowski, NPS Transportation Coordinator
- Ms. Robin Taksony, NPS Food Service Manager

2.1.4 PEP Priority concerns to be addressed 2008.

Priority concerns to be addressed as part of this implementation plan include increasing public awareness of the Rouge River watershed, and implementation of the educational concepts discussed above.

The top priority for 2008 has been development of the Stormwater Management Team, finalization of this “Stormwater Management Program Plan”, and implementation of tasks outlined in the plan. Significant resources have and will continue to be committed to this SWMP by NPS and in meeting the stated objectives.

The 2nd priority for this year is completion of the “Stormwater Awareness” webpage to be added to the districts website. The website should be completed and running in preliminary form prior to July 1, 2008 and will include a copy of the SWMPP, educational materials, the “Seven Simple Steps to Clean Water” tips, community and watershed group information. Ultimately, the webpage will also include announcement of NPS watershed activities, dates and locations of community household waste collections, recycling center locations and instructions, as well as recognition of students, faculty, staff, and volunteers actively involved with watershed improvement programs.

The 3rd priority for 2008 is providing stormwater awareness training & workshops for NPS maintenance, custodial, and food service staff. These training workshops will be designed to provide staff with an awareness of issues associated with stormwater run-off, specific issues associated with stormwater run-off from NPS facilities, review of the stormwater program plan, chemical storage & waste management practices, along with operations and maintenance of stormwater structures and conveyances.

2.1.5 Objectives for Public Education Plan.

- 1) To increase the general awareness among the “public” within NPS of the Rouge River watershed including associated tributaries and specifically how daily activities impact the resource (i.e. build awareness).
- 2) Improve the public’s perception of the Rouge River’s existing and future potential as a community asset, recreational and natural resource (i.e. get people excited about the resource - foster stewardship)
- 3) Develop and implement public involvement and education programs through service learning (“Seven simple steps to clean water” program and the “Rouge Education Project”), materials and activities for the public in our community, building awareness and fostering stewardship toward the watershed and the environment as a whole.
- 4) Document increases in the number of staff, faculty, students, schools, groups, or individuals from our community that are participating in existing Rouge River educational efforts including the “Rouge Education Project” schools, Rouge Rescue volunteers & sites, River Watch groups & miles of river adopted.

- 5) Encourage participation in watershed activities through promotion of watershed programs, groups, and events on the NPS district website, cable channel, and newsletters.

2.1.6 Organizations assisting with Public Education Program

Organization	Program	Contact Person
Battle Creek Area Math & Science Center	Elementary Science Outreach Program	
Friends of the Rouge	Rouge Education Project	Noah Mehalski
SEMCOG	Seven simple steps to clean water	
City of Northville	Notification of services and events	Jim Gallagly
Northville Township	Notification of services and events	Jill Rickert
Wayne County Department of Environment	Educational & training program assistance, 24-hour hotline assistance	Environmental Department
Oakland County Drain Commission	Educational and training program assistance, 24-hour hotline assistance	Environmental Department
The healthAIR Group	Training programs & workshops	John McDonald/Kory Stevens

2.1.7 Schedule for Public Education Plan (PEP) implementation

Best Management Practices (BMPs) for implementation and assessment of this PEP are outlined in the following activities:

BMP #1: Develop NPS webpage specific to stormwater information

Target Audience: Students, staff, faculty and all community members.

Messages: All of the messages listed the PEP

Description: Watershed information web page will be developed to include educational information, report hotline, links to watershed groups, community watershed information, updated quarterly or as needed.

Timetable: Implemented by July 1, 2008 and ongoing

Responsibility: NPS

Evaluation Method: Document how many people visit this website with hit counter.

Goal: To increase awareness, education, and interest in water related issues.

Objectives Met: all

BMP #2: Public Notice and Promotion of the Stormwater Management Program through school newsletters.

Target Audience: All community members, NPS faculty, staff, students, and visitors.

Messages: The importance of clean water and the health of our local watersheds.

Description: NPS will include an announcement and notice regarding the development and implementation of the Stormwater Management Program in NPS school and district newsletters. The announcement is intended to inform our public regarding access to the plan, allow for public comments, and provide information regarding public involvement with the programs outlined in the plan. Future newsletters will include announcements and advertisements of public involvement opportunities and other community or watershed programs.

Timetable: 1st announcement by September 30, 2008 and ongoing

Responsibility: NPS Staff

Evaluation Method: tracking number of newsletters mailed or distributed and requests for information regarding the program.

Goal: To educate faculty, staff, students, visitors and related community members about how their actions can impact water quality.

Objectives Met: all

BMP #3: Display “Seven Simple Steps to Clean Water” brochures, posters, and display boards at the NPS Board of Education (lobby) for community education

Target Audience: Faculty, staff, students, visitors and community members.

Messages: Our activities affect the Rouge.

Description: The “Seven Simple Steps to Clean Water” display boards, posters, and brochures will be displayed at the board of education offices.

Timetable: Completed by May 31, 2008

Responsibility: NPS staff and students

Evaluation Method: Display posters and brochures available throughout the school year. Number of brochures purchased and/or distributed.

Goal: To educate faculty, staff, students, visitors and related community members about how their actions can impact water quality.

Objectives Met: all

BMP #4: Display “Seven Simple Steps to Clean Water” brochures, posters, and display boards at NPS schools and auxiliary facilities for community education

Target Audience: NPS students, staff, faculty, visitors and all related community members.

Messages: Our activities affect the Rouge.

Description: “Seven Simple Steps to Clean Water” display boards, posters, and brochures will be placed in schools and facilities and made available throughout the school year.

Timetable: September 1, 2008

Responsibility: NPS

Evaluation Method: Number displays, posters, and brochures purchased and/or distributed.

Goal: To educate faculty, staff, students, visitors and related community members about how their actions can impact water quality.

Objectives Met: all

BMP #5: Develop & Implement District-Wide Recycling Program

Target Audience: NPS faculty, staff, students, and visitors to NPS facilities

Messages: Recycling is an important function to reduce the amount of wastes for land disposal and to keep our environment clean.

Description: Develop a district wide contract for solid waste disposal to include provisions for recycling of paper, plastic, glass, cardboard, etc.

Timetable: Implement by July 1, 2008 and ongoing

Responsibility: NPS staff.

Evaluation Method: Track the amount of materials shipped for recycling and compare to previous years. Maintain records of types & quantities for materials recycled. Track the quantity of trash bags purchased and used throughout the district and compare to previous years.

Goal: Decrease the amount of solid waste land disposed and emphasizing the NPS commitment toward recycling.

Objectives Met: e, j, n

BMP #6: Continue Promotion & Involvement with the “Rouge Education Project” and The Friends of the Rouge.

Target Audience: NPS faculty, students, relatives, staff, entire community and watershed.

Messages: Caring for and monitoring of our water resources.

Description: Commitment to encourage involvement of as many NPS elementary, middle, and high school classes as possible, in either the fall or spring Rouge monitoring program per year. NPS Faculty, students, and volunteers have participated in the “Rouge Education Project” for several years. Students, faculty, staff, and volunteers work together to conduct sampling and data collection on the Rouge River watershed.

Timetable: Ongoing curriculum program

Responsibility: NPS faculty, staff, students, and Friends of the Rouge

Evaluation Method: Document which schools participate, number of individuals involved, and when.

Goal: To provide students an opportunity to get “hands-on” experience and be involved in making a difference in “our” watershed.

Objectives Met: a, b, d

BMP #7: Reporting Hotline

Target Audience: Faculty, staff, students, visitors, and the entire NPS community.

Messages: You have a responsibility to report improper dumping or illicit discharges into stormwater systems.

Description: Publicizing/posting the NPS contact information and the OCDC/Wayne County environmental 24-hour hotline information in all NPS facilities and on the NPS website.

Timetable: Implement by March 1, 2008 and ongoing

Responsibility: NPS staff.

Evaluation Method: Keep a log of all reports, when they occur and what they involved including any necessary follow-up

Goal: To make sure that illicit discharges are being reported.

Objectives Met: c

BMP #8: Staff and Faculty Workshop Sessions

Target Audience: Staff and Faculty

Messages: Caring for our water resources.

Description: Hold annual work shop session utilizing videos and other available resources and materials to provide education to both faculty & operational staff.

Timetable: Implement by August 31, 2008 and ongoing

Responsibility: NPS faculty & staff, Friends of the Rouge, SEMCOG, OCDC, MDEQ, USEPA, healthAIR Group

Evaluation Method: Keep a list of participants and compare yearly to assure that all staff is participating. Goal is to have a minimum of 25% participation per year and 100% participation in each permit cycle.

Goal: To make sure staff and faculty are educated regarding water resources, stewardship, and pollution prevention opportunities and initiatives.

Objectives Met: all

BMP #9: “Practice Good Car Care” Education

Target Audience: Students, staff, faculty and community members.

Messages: Maintaining & washing your car responsibly to protect our environment.

Description: NPS will post a link to the SEMCOG-“Ours to Protect” webpage to provide specific information regarding proper vehicle washing and maintenance procedures to minimize impacts to the Stormwater system. Educational brochures will be provided to all student drivers who apply for a parking permit at the high school.

Timetable: Beginning fall 2008 and ongoing

Responsibility: NPS staff and faculty, SEMCOG

Evaluation Method: Document number of brochures distributed along with parking passes and throughout the district.

Goal: Educate students, faculty, staff, and the community on vehicle maintenance & residential car washing impacts to the watershed.

Objectives Met: G

BMP #10: Website Link for Septic Tank Maintenance

Target Audience: Students, staff, faculty and related community members

Messages: Septic Systems must be maintained

Description: Septic tank maintenance brochures and information will be available throughout the district and promoted on the NPS webpage.

Timetable: Implement by March 1, 2008 and ongoing

Responsibility: NPS staff, faculty and students and students’ parents.

Evaluation Method: Document number of brochures distributed and web page hits

Goal: To increase awareness and educate students, faculty and the community.

Objectives Met: H

BMP #11: Special Notice Sent to Contractors for Acknowledgement of SWMP and Requirement to Practice BMPs.

Target Audience: Vendors and contractors

Messages: NPS cares about water quality, stewardship, and compliance with State Regulations and Requirements.

Description: NPS will send a written notice to all vendors and contractors whose activities could pose an impact to water quality at NPS facilities. This notice will include instructions for obtaining copies of the SWMP and require vendors and contractors to confirm receipt and acknowledgement of the provided information and agree to utilize BMPs during performance of their specific functions.

Timetable: Begin in June 2008 and ongoing

Responsibility: NPS staff, faculty, administrators, and contractors/vendors.

Evaluation Method: Number of notices sent and signed acknowledgements returned.

Goal: Educate vendors and contractors about issues associated with clean water and the effects to the watersheds.

Objectives Met: A, B, C, E, F

2.1.8 Plan for Evaluating Impacts.

The Public Education Plan will be evaluated based on progress made towards meeting the BMP objectives described above. It is anticipated that during the individual Watershed Management Plan development process, the need for and opportunities to evaluate the success or impact of public education plans will be discussed. To this end, NPS is willing to discuss its participation in future surveys, and/or studies, to evaluate impacts of the public education plan with our fellow watershed and/or sub watershed communities, other local school districts, as well as other organizations or agencies involved in stormwater management/watershed management educational efforts. NPS is developing a watershed awareness survey and plans to begin implementation in the upcoming year. This survey will provide a baseline of current student watershed awareness to be used in future surveys. These surveys will be used to evaluate students current awareness of watershed issues and identify opportunities for enhancement of the PEP. The evaluation mechanisms and results will be briefly described in the annual progress reports. In addition, tracking the participation of our community's schools, community groups, and individuals in existing Rouge Educational programs will be another method of evaluating the impacts of these programs.

2.2 Public Involvement and Participation Program (PIP)

2.2.1 Public Involvement and Participation Program Objectives

Permit Task Description:

- a. Public notice of the Stormwater Management Plan
- b. Participate in a citizen advisory committee
- c. Work together with stream or watershed groups

Public Input shall be encouraged in all aspects of the stormwater management program. NPS will implement the following minimum actions in order to involve public participation:

1. Copies of the approved stormwater management plan shall be available for public inspection via the Internet and by request to the Operations Department. The public will be notified when and where it is available through announcements to be placed in both the district and individual school newsletters along with notices sent to all faculty, staff, and students parents through the district list server.
2. NPS will include community groups in the implementation of the SWMP. These activities will include providing educational pollution prevention and watershed educational materials at NPS facilities and on the “Stormwater Awareness” webpage on the districts website.
3. NPS will pursue active and cooperative partnerships plus information and resource sharing with local stream and watershed protection organizations and will inform them of activities under the stormwater management program. Local partnerships currently include:
 - SEMCOG
 - City of Northville
 - Northville Township
 - Oakland County Drain Commission
 - Wayne County Department of Environment (DOE)
 - Friends of the Rouge
 - Alliance of Rouge Communities (ARC)
 - The Rouge Project
4. State and Federal organizations NPS may partner with and use as resources include but are not limited to the following:
 - U.S. Environmental Protection Agency, Great Lakes National Programs Office
 - Michigan Department of Environmental Quality-Water Bureau
 - Michigan Department of Environmental Quality-Michigan Environmental Education Curriculum (MEEC)

Appropriate Best Management Strategies¹ (BMPs) for this section and measurable goals for each BMP follow:

2.2.2 PIP List of BMPs

BMP#	BMP Description	Time Line/Goal	Evaluating Method	Involved Parties
1	Public notice of SWMPP via newsletter. Notification by e-mail to all faculty, staff, local communities, and Rouge River watershed partners.	By 9/30/08	Date of publication and mailing/Number of documents mailed or distributed	NPS
2	Public access to SWMPP - Copies of the Stormwater management Plan will be available at the School Administration Building and will be posted on the NPS Website in PDF format	7/1/08	Number of copies distributed Hits on Website	NPS
3	SWMPP Review- review any comments or edits provide by SWMPP team members and incorporate in final SWMPP	4/11/08	Receipt date when feedback from all reviewers is complete	NPS Stormwater Team Members
4	Cooperation with local communities and groups in activities such as storm structure marking and labeling	6/30/2008 and ongoing	List of projects (sites marked and number of volunteers involved)	NPS staff, Communities organizations, Watershed groups
5	NPS will conduct training workshops for staff in areas of: maintenance, custodial, and transportation.	2008 and ongoing	Attendance at training sessions	NPS

¹ Best Management Practices means structural devices or nonstructural practices which are designed to prevent pollutants from entering into stormwater flows, to direct the flow of stormwater, or to treat polluted stormwater flows.

2.3 Illicit Discharge Elimination Program (IDEP)

2.3.1 IDEP Program Objectives

Permit Task Description:

- a. Develop a map of the MS4
- b. Find illicit connections in the mapped MS4
- c. Eliminate illicit connections inside MS4 rights of way
- d. Eliminate illicit connections in the mapped MS4
- e. Minimize illicit discharges inside MS4 rights of way
- f. Minimize illicit discharges in the mapped MS4
- g. Conduct dry weather point source screening for the mapped MS4
- h. Limit seepage from public sanitary systems
- i. Limit seepage for on-site sewage disposal systems (septic tanks)
- j. Legally regulate pollutant contribution to the MS4
- k. Legally prohibit illicit connections and illicit discharges to the MS4
- l. Require compliance with ordinances, permits, etc.
- m. Conduct inspection of possible illicit sources
- n. Conduct surveillance of possible illicit sources
- o. Conduct monitoring of possible illicit sources

The Northville Public Schools illicit discharge elimination program is designed to prohibit and effectively eliminate illicit discharges, including discharges of sanitary wastewaters, to permitted stormwater drainage systems.

“Illicit discharge” means any discharge (or seepage) to the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater. Illicit discharges include but are not limited to the following:

- Dumping of motor vehicle fluids
- Improper disposal of household hazardous wastes
- Grass clippings
- Leaf litter
- Pet & other animal wastes
- Unauthorized discharges of sewage
- Industrial wastes
- Restaurant wastes
- Vehicle & equipment wash waters
- Any non-stormwater waste

“*Illicit connection*” means a physical connection to the drainage system that 1) primarily conveys illicit discharges into the drainage system or 2) is not authorized or permitted by the local authority (where a local authority requires such authorization or permit).

1. Northville Public Schools’ (NPS) goal is to eliminate all illicit discharge from their facilities and restrict the discharge of polluting substances to the separate storm sewer system. NPS currently operates thirteen (13) secondary and elementary schools along with administrative and transportation facilities within this system that discharge to municipally owned separate storm sewer systems (MS4s). The process to implement these goals will consist of the elimination of any non-stormwater connections from

any NPS facility to any waterway or municipally owned storm sewer system (MS4). These systems are required to meet NPDES Phase II stormwater regulations and local municipalities and public entities in which these systems are located must perform IDEP investigations. This will include dry weather screening, outfall testing, and dye tracing of all drains to determine where they lead. Mapping² of this system will be prepared and any drains contributing any illicit materials will be identified. Should NPS be informed of an illicit discharge or connection, NPS will investigate and remedy the problem. If NPS is found to be responsible for an illicit discharge, it will be eliminated with greatest expediency possible.

2. Use of tracer dyes for dye testing activities requires pre-approval from the Michigan Department of Environmental Quality (MDEQ)-Water Bureau and only MDEQ approved dyes may be used. NPS will apply to the MDEQ for approval to conduct dye testing of the storm system prior to conducting these activities.

The following table provides a list dyes approved for use by the Michigan Department of Environmental Quality:

DYE NAME	CAS NUMBER	ALTERNATE NAME	FAV
Blue AZO Liquid	3844-45-9	Blue Dye	12,000 ug/l
Fluorescein	518-47-8	CI Acid Yellow 73 FLT Yellow/Green Fluorescein FLT Fluorescein LT Sodium Fluorescein Uranine	30 mg/l
Rhodamine WT	37299-86-8	Acid Red 388	13 mg/l
Lissamine Yellow FF	--	CI Acid Yellow 7 Brilliant Sulphoflavine FF Brilliant Acid Yellow 8G	200 mg/l

² See Appendix B: Northville Public Schools / Project Schedule for District Wide Stormwater Mapping Activities

2.3.2 Illicit Discharge Investigation and Elimination BMPs

The following BMPs will be implemented to investigate potential illicit discharges from NPS facilities:

- BMP #1 Review site diagrams and conduct site inspections to verify and/or identify storm sewer conveyances, identify location of all outfalls, and determine waterway or other MS4 where the stormwater discharges or leaves the property.
- BMP #2 Dry weather screening of all outfalls will be conducted, all stormwater structures will be inspected, and outfalls will be inspected and tested for illicit discharge parameters where indicated as necessary. Dye tracing of storm lines or sewer drains located in sensitive areas will also be completed as necessary. The final facility MS4 maps will identify all storm system structures and other conveyances, all outfalls, and the receiving water or other MS4 operator to which the point sources discharge.
- BMP #3 Update facility diagrams with the location of stormwater structures and conveyances, along with the location of any outfalls, and the waterbody name or other MS4 operator identifying where the stormwater discharges.
- BMP #4 Eliminate illicit discharge connections if found during investigation and mapping phase by December 31, 2009.
- BMP #5 NPS will continue a system of marking and labeling storm drain structures to identify those going to river/waterway. A system of stenciling, marking, and/or signage is used to identify all these structures.
- BMP #6 NPS maintenance, transportation, and custodial staff are trained annually in proper handling of hazardous materials and substances and to prevent inadvertent disposal of materials into river/waterway.
- BMP #7 NPS requires the washing of vehicles and equipment only in vehicle wash bay or bus wash facility areas with drains to sanitary sewer lines.
- BMP #8 NPS will continue to investigate each facility including sensitive areas such as garage floor drains and auto shop classrooms to ensure proper use and maintenance of oil-water separators and that they are connected to the proper sewer system.
- BMP #9 NPS conducts routine inspections of maintenance areas, garage buildings, and auto shop classroom for proper storage of polluting materials (proper storage of vehicle fluids, cleaning chemicals, landscape pesticides, herbicides and fertilizers).
- BMP #10 NPS has a turf management plan and will continue to use it. Fertilizer use is only performed on varsity athletic fields and is performed in compliance with the NPS "Facility Nutrient Management Policy".
- BMP #11 evaluate all existing buffer areas and ensure proper maintenance. NPS presently uses mulching mowers, therefore grass clippings and leaf litter will be worked into existing lawn areas. All drainage from these areas will pass through natural buffer areas to filter discharge. All turf areas other than athletic fields are cut to 3" length, field turf is cut to 2 1/2".
- BMP #12 Inspect all river or stream bank areas on or adjacent to NPS properties to ensure proper use of BMPs to avoid erosion problems.
- BMP #13 NPS will conduct re-inspections of storm sewer system structures and conveyances, including dry weather screening and outfall testing at least once every five years.

2.3.3 IDEP Stormwater Program Schedule

BMP #	Task	Goal	Measurable Goal	Deadline
1	Review Engineering Drawings	Assure that illicit discharges connections are connected to the correct sewer. If drawings are not adequate, field investigations will be conducted.	All plans reviewed / all areas field checked where plans are not available	3/31/08
2	Identification and investigation of conveyances and dry weather screening and outfall testing	Conduct an investigation of all storm water conveyances and complete dye weather screening and outfall testing to identify and eliminate illicit discharges	All inspections completed	8/28/2009
3	MS4 mapping	Complete mapping of all facility storm sewer systems including outfalls, structures, conveyances, and discharge points	All Maps updated and completed	8/28/2009
4	Illicit Connections	Reroute to proper discharge facility	Eliminate all illicit identified connections	12/31/2009
5	Mark stormwater structures	To indicate the SW Operator & the river or waterway they drain into & to inform the public not to dump anything into these structures.	All structures marked (also see PEP and PPP)	Ongoing
6	Staff Training	Train staff on the handling and disposal of illicit materials	Number of People trained	Ongoing and annually
7	Vehicle washing	Instruct staff on proper location to wash vehicles	Number of people trained	Ongoing
8	Garage, auto shop, and facility floor drains	Investigate to determine if floor drains are connected properly and/or have oil-water separators	Number of drains investigated	6/30/2008
9	Storage of materials	Investigate chemical storage areas for proper storage, spill containment, markings, etc.	All storage areas inspected	9/30/2008 and ongoing
10	Turf management program	Conduct soils analysis on areas which use fertilizers to determine required fertilizers and trace elements to provide an acceptable turf condition	Reduction of fertilizer content and number of applications	ongoing
11	Provide natural buffers prior to points of discharge	Review points of discharge and develop natural buffers. Properly maintain buffer areas.	Number of discharge points protected/maintenance conducted	ongoing
12	Conduct Bank Inspections	Inspect banks along NPS properties to identify erosion or potential erosion problems and check for water clarity conditions	Bank Inspections completed	8/28/2009
13	Re-inspection of storm system conveyances, dry weather screening, outfall testing, and bank erosion inspections	Following initial inspection of mapped MS4, re-inspect system at least once every 5 years	All structures, outfalls, and conveyances re-inspected and tested if necessary	5/31/2012

2.4 Post construction Stormwater Management Program for New Development and Redevelopment Projects

2.4.1 Post Construction Stormwater Management Program Objectives

Permit Task Description

- a. Require controls for certain developments
- b. Ensure post construction controls to minimize water quality impacts
- c. Address post construction flow impacts
- d. Develop a comprehensive storm water management plan
- e. Implement a comprehensive storm water management plan
- f. Develop and implement ordinances or other regulatory mechanisms for development sites
- g. Require post construction BMPs by ordinance or other regulatory means
- h. Require adequate long-term O&M of BMPs by ordinance or other regulatory means
- i. Require post-construction erosion and sedimentation control by ordinance or other regulatory means
- j. Regulate the flow rate into the MS4 from development sites by ordinance or other regulatory means
- k. Review site development plans for adequate BMPs
- l. Review commercial site development plans for inlet isolation from polluting sources

The goal of the Post Construction Management Program is to implement and enforce a program to minimize stormwater discharges and to increase the water quality into the drainage system from new development and redevelopment projects.

Project review during planning phase:

- Consideration of BMP(s) to implement as part of the project to minimize impact.
 - Plans for proposed projects will be reviewed at conceptual, preliminary and final planning stages to determine appropriate BMPs to reduce water volume leaving the site and water quality leaving the site have been implemented. Grassy swales, sediment forebays for detention ponds, vegetated (emergent vegetation) detention basin; the use of aqua swirl structures, etc. will be considered.
 - Minimize paved surfaces
 - Preserve natural vegetation along stream banks.
 - Use grassy swales to slow and absorb runoff.
 - Implementation of rain gardens to reduce runoff and to be used as teaching tool in school curriculum.
 - Use naturalized plantings or “Grow Zones” where suitable to reduce runoff and increase water uptake by plant material through use of deep-rooted plants, and reduce fertilizer usage.
- For compliance to local stormwater and illicit discharge ordinances
- Maintenance considerations.

Project review during and post construction:

- Continue compliance to local stormwater and illicit discharge ordinances
- Maintenance considerations.
 - Staff will be trained to recognize sediment control system failures.
 - Long-term maintenance measures will be implemented to maintain BMPs and to assure proper operation and continued benefit.

2.4.2 General Post Construction Stormwater Runoff Controls for New Development and Redevelopment Projects - BMP Table

BMP	Description	Measurable Goal	Deadline
Construction plan reviews	Projects reviewed on individual basis	All plans reviewed	On-going
Maintenance Training	Train Personnel in BMP maintenance	All personnel are trained	2009
BMP Maintenance	BMP operations & maintenance program for each BMP type used at each facility	All BMPs have Operations & maintenance procedures defined and in place	On-going as needed/yearly

2.5 Construction Site Stormwater Runoff Control

2.5.1 Construction Site Stormwater Program Objectives

Permit Task Description:

- a. Prohibit discharges to the MS4 that are not in compliance with the construction Permit By Rule
- b. Notify the soil erosion agent and the department of construction deposits into the MS4
- c. Review all preliminary construction site plans to assure space is allotted BMPs
- d. Receive and respond to complaints about construction site run-off to the MS4

2.5.2 Qualifying Local and State Soil Erosion and Sedimentation Controls

The construction site developer or recorded easement holder shall comply with soil erosion and sedimentation control requirements under part 91 of the Michigan Act.

- The construction site developer or recorded easement holder shall control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality.
- Potential water quality impacts shall be considered during site plan reviews for all construction activities.
- Sites shall be inspected during construction and control measures shall be enforced.

2.5.3 Potential Additional Construction Control

Because each site has its' own special circumstances and conditions the following BMPs will be used as appropriate according to site conditions.

- Reduce runoff from the site to greatest extent possible (provide holding basins, divert water through grassed swales).
- Prevent spills and discharges.
- Control waste such as building materials, concrete washout, chemicals, litter, and sanitary waste.
- Phasing will be considered to limit amount of exposed soils.
- Interim soils stabilization methods are to be considered (temporary seeding, mulching etc.).
- Buffer preservation (avoid exposing soils to property limits)
- Inspection staff will be trained in the proper maintenance and operation of Soil Erosion and Silt Prevention measures

2.5.4 Stormwater Management Program-Minimum Measures

- Provide for notification of appropriate Soil Erosion and Sedimentation Agency and the Michigan Department of Environmental Quality verbally, within 24 hours, if construction results in a deposit or imminent deposit of solids or other waste materials in the drainage systems that may endanger health or the environment. All other violations or deposits will be reported in accordance with Part I.C.2a. of the general permit.
- Review of plans for adequate space to implement necessary soil erosion and sedimentation control measures.
- Provide a procedure to receive and provide follow up on complaints or other information submitted by the public regarding construction site stormwater runoff leading to the drainage system.

2.5.5 Construction Site Stormwater & Sediment Runoff Controls-BMP Table

BMP	Description	Measurable Goal	Deadline
Soil erosion and sedimentation control requirements	Construction site developer or recorded easement holder shall abide by soil erosion and sedimentation control requirements shall obtain all required to obtain all permits and implement require measures	Required permits obtained	On going per project
Control waste	Construction site developer or recorded easement holder shall control all waste.	Daily visual inspections	On going per project
Plan review for potential water quality impacts	Plans will be reviewed at preliminary, final and construction document review stages. Specific BMP's to be used will be determined during this review.	Reduce negative impacts on water quality	On going per project
Construction inspection	Staff will observe daily operations to enforce control measures	Reduced number of system failures	On going per project
Notification of deposit	Staff shall notify DEQ within 24 of contaminant deposit or imminent deposit.	Control of potential system failure	Ongoing on and incident-by-incident basis.
Review of spatial adequacy	During plan review plans will be scrutinized for required space to implement soil erosion measures	Reduced number of soil erosion control failures	On going per project
Complaint log	Provide a system to track complaints involving stormwater runoff from construction site and record resolution of these complaints	Number of complaints successfully resolved	On going per project

2.6 Pollution Prevention/Good Housekeeping for Municipal Operation

2.6.1 Pollution Prevention & Good Housekeeping Program Objectives

Permit Task Description:

- a. Ensure that employees properly handle wastes, recyclables, chemicals, and equipment
- b. Ensure that employees maintain a clean work area
- c. Ensure that employees identify and report storm water pollution sources
- d. Provide employee guidance or operation manuals
- e. Provide employee storm water BMP training
- f. Provide equipment for pollution prevention and good housekeeping
- g. Inspect catch basins and maintain Catch Basins
- h. Inspect and maintain Vegetative BMPs
- i. Inspect and maintain structural BMPs
- j. Add or enhance structural controls as needed to reduce Stormwater runoff pollution
- k. Add or enhance cleaning schedules as needed to reduce Stormwater runoff pollution
- l. Properly dispose of operation and maintenance wastes to prevent violation of water quality standards
- m. Provide road construct/maintenance controls
- n. Provide highway construct/maintenance controls
- o. Provide parking lot construct/maintenance controls
- p. Clean streets
- q. Keep salt and sand (de-icing materials) out of receiving streams to the maximum extent possible
- r. Provide good housekeeping at sand and salt storage facilities
- s. Provide good housekeeping for fleet maintenance facilities
- t. Label newly built outfall structures
- u. Construct new flood controls and water quality controls
- v. Examine and retrofit existing flood controls for water quality control
- w. Assure proper storage, handling, and use of lawn chemicals
- x. Provide employee training to assure proper storage, handling, and use of lawn chemicals
- y. Provide a turf management program for public lands to control storm water runoff pollution
- z. Provide soil testing on public lands where fertilizer is used

It is the ultimate goal of Northville Public Schools to prevent and reduce pollutant/contaminant runoff from NPS operations into the Rouge River Watershed systems to the maximum extent practicable. Paved roads and parking lots in particular catch many contaminants from automobiles (use and maintenance), grounds maintenance materials and practices (waste disposal, fertilizers, etc.)

The following steps, currently being taken, will continue to be taken to minimize stormwater contamination from impervious surfaces:

2.6.2 Structural Controls

All structural controls will have routine maintenance, maintenance schedules, and long-term inspection procedures which adequately control, to the maximum extent practicable, pollution removal and control. All structural BMPs will be identified and inspected as part of the district wide storm sewer system mapping, screening, and testing schedule. O&M policies, procedures, and schedules will be developed for each BMP identified and implemented to ensure that they are maintained and function properly.

2.6.3 General Pollution Prevention/Good Housekeeping Practices – Structural Controls BMP Table

BMP	Description	Measurable Goal	Implementation (year)				
			2007	2008	2009	2010	2011
BMP Operation and Maintenance Manuals	1) Evaluate all existing BMP O&M Manuals 2) Develop manuals for new or existing structural BMPs that do not have manuals as of October 2009	1) All evaluations complete 2) All existing new and BMPs have O&M manuals		X			
BMP Training/Education	All O&M personnel shall be trained in proper O&M methods	Documentation of personnel in attendance and training dates.			X		
BMP Policies & Procedures	Develop policies/procedures for waste disposal for O&M materials	Policy and Procedure Manual available for use/training.				X	

2.6.4 Pollution Prevention/Good Housekeeping - Roadways

2.6.4.1 General Roadway Cleanup:

- Routine cleanup of debris in outside areas
- Immediate spill clean up
- Use of dry methods such as sweeping to clean pavement instead of hosing down.
- Marking or labeling of storm drains

2.6.4.2 Winter Road Maintenance and Cleanup:

- Stockpiling or keeping all deicing material in waterproof containers
- Store deicers on a paved surface to prevent permeation to groundwater
- Prevent deicer drainage to storm sewer
- Mechanical removal of as much snow or ice as possible prior to applying deicing chemicals
- Maintain application equipment in good working condition

2.6.4.3 General Pollution Prevention/Good Housekeeping Practices Roadways BMP Table

BMP	Description	Measurable Goal	Implementation (year)				
			2007	2008	2009	2010	2011
Labeling Storm Drain Structures	Stencil all Storm Drain Structures	All Storm Drain Structures Labeled	X	X	X		
Implement Good Housekeeping Procedures	Maintain all NPS roads and vehicular use areas properly throughout the year. Maintenance includes proper handling and use of O&M and deicing materials, use of dry methods to clean paved areas, immediate spill clean-ups	Review of facility, chemical storage area, and vehicle inspection reports	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

2.6.5 Pollution Prevention/Good Housekeeping – Fleet maintenance

2.6.5.1 General Pollution Prevention

Oil and greases, solvents, battery acid, coolant and gasoline from automobiles and machines can cause serious contamination in a separate stormwater system. NPS will take the following steps to assure automobile fluids avoid coming in contact with stormwater:

NPS existing policy is to keep all vehicles and all machinery properly maintained in order to prevent/minimize contamination of stormwater systems by automobile fluids. Vehicular/machine maintenance includes but is not limited to changing/adding fluids (including fuel), lubrication, mechanical repairs, parts degreasing, and vehicle or equipment washing. NPS does and will continue to perform these activities in manners that minimize the potential for any contaminants to come into contact with a stormwater system:

- All vehicle maintenance will take place inside or away from storm drains.
- Floor drains in vehicular maintenance areas will be dye-tested to verify that they are connected to the sanitary sewer and **NOT** the storm sewer.
- All vehicles will be routinely checked for leaking oil and fluids. Repairs will be made immediately upon discovery of leaks.
- Bus drivers will inspect buses daily for leaks as part of their routine vehicle inspection.
- Drip pans or other containment structures will be used to contain leaks or drained fluids from vehicles.
- Collected vehicle fluids will be stored in an approved waste or recycling drum. The container will be labeled with contents and will be removed and disposed of as necessary by a licensed liquid industrial waste hauler.
- Any oil-water separators in maintenance garages will be pumped out as necessary to maintain efficiency. NPS will maintain records of dates maintenance is conducted.
- All maintenance and transportation employees are provided training in proper handling and storage of vehicular and equipment fluids and cleanup practices upon hiring.
- Spill clean-up kits will be maintained at all NPS facilities for use in containment or cleanup of releases that may impact the storm sewer system. Spill kits will include absorbent pads, pigs, socks, floor-dry, drip pans, protective gloves, goggles, broom, and shovel at a minimum to be used in the event of a chemical spill or release.

2.6.5.2 Vehicle and Equipment Fluids

- All vehicle and related equipment fluids shall be stored indoors and away from storm sewer drains.
- Vehicle and related fluids will be stored off the ground/paving by use of pallets, shelving.
- All fluids will be stored away from vehicle use/traffic areas within the garage.
- All fluids will be labeled with manufacturer label if available or with other appropriate labels.
- Staff will abide by all use instructions on labels of all fluid containers.
- Secondary containment will be used for all large containers (i.e. 55 gallon drums).
- All fluids shall be disposed of as necessary by a licensed liquid industrial waste hauler.

All NPS maintenance garages will keep a spill kit available at the garage in an obvious and easily accessed location. The kit will contain, at a minimum, absorbent socks, absorbent pads, disposable bags/ties, labels, gloves, and goggles. If the spill kit is used, it will be replenished immediately.

2.6.5.3 Vehicle Maintenance

Maintenance of vehicles can be threat to stormwater quality. To prevent accidental contamination NPS will institute a strict policy to require the following:

- All maintenance operations to be conducted within a maintenance garage.
- All changing of fluids will be done away from storm drains.
- All accidental spills will be contained and cleaned immediately
- All drains within maintenance garage will be dye tested to assure that no drains flow into stormwater drainage system.
- Drip pans will be used to collect leaks from vehicles.
- All collected fluids will be stored in marked containers for recycling or disposal by licensed waste hauler.
- Oil separators in garage will be inspected and maintained on a regular schedule.

As indicated in other sections storm drains will be marked and personnel will be instructed to assure proper cleanup procedures are employed and no contaminants will be permitted to be dumped, accidentally deposited or allowed to drain into structures.

2.6.5.4 Fleet Maintenance BMPs

BMP #	Description	Goal	Measurable Goal	Deadline
1	Cleaning/Sweeping of parking lots	Prevent debris entering into stormwater system	Number of times a year parking lots cleaned and/or swept	On going
2	All machine/vehicle maintenance practices and activities will be conducted within a maintenance garage or enclosed area away from storm drains.	Prevent machine and vehicle fluids from entering into the stormwater system.	Documentation of machine/vehicle inspections/repairs and where repairs took place.	Ongoing
3	Continue policy requiring containment of all spills and clean up immediately ³	Contain contaminants and prevent entry or spread of spill	Document spills and log reduction of incidents	Current and Ongoing
4	Contain all chemicals from vehicle washing/machine cleansing	Prevent chemicals from entering into the stormwater system by using the existing NPS wash facilities.	Document where vehicles and machine cleaning takes place.	Current and Ongoing
5	Verify through dye testing that no outlets are connected to stormwater systems.	All floor drains located in maintenance garages and any grounds maintenance facilities will be dye tested to verify connection to the appropriate sanitary sewer system.	Elimination of all identified illicit connections	By August 31, 2009

³ See Appendix C [Northville Public Schools Hazardous Materials and Waste Spill Response](#)

6	Provide drip pans/absorbents for use under vehicles leaking fluids.	A void spreading drips to other areas of site through tracking and prevent entry in stormwater system.	Reduce number of vehicle leaks	Current and Ongoing
7	Store used motor oil and other fluids in marked containers for recycling or disposal by licensed hauler	Eliminate waste of reusable material and dispose of non-recyclables through an appropriate method.	Reduction in amount of disposed material and amount of material shipped for off-site disposal.	Current and Ongoing
8	Mark stormwater structures	To indicate the river waterway they drain into and to inform the public not to dump anything into these structures.	All structures marked	June 2008 and Ongoing

2.6.6 Pollution Prevention/Good Housekeeping – Food Services

NPS has conducted a complete review policies and procedures for proper handling, use, and disposal of chemical products and waste materials. Chemical materials are limited to only materials required for proper sanitation of food service and handling areas. Used cooking oils and greases are collected and shipped off-site by a certified grease hauling company. Trash collection areas are inspected daily and kept clean of debris. All food service employees are provided “Safe-Serv” training which includes procedures for proper handling and disposal of sanitary wastes and cleaning chemicals.

2.6.7 Stormwater System Labeling/Marking

NPS has a system in place to complete marking and labeling of storm drain structures. All structures are either marked with stencils or raised signs to indicate “No Dumping” and that the structure drains to the local waterways.

2.6.8 Flood control Projects

NPS will assess impacts on water quality by examining existing projects for incorporation of additional water quality protection devices or practices. These projects include combined efforts between NPS, local & state government units, and local watershed groups.

NPS will examine all existing flood control systems for proper use, working order, and maintenance. Existing systems will be inspected regularly and marked in accordance with the applicable standards. NPS will continue to work with the local communities and watershed organizations to identify potential new areas for improvements throughout the NPS jurisdiction.

Stormwater detention and retention basins have recently been incorporated for management of stormwater at NPS facilities. These units are located at Northville High School, Meads Mill Middle School, and Ridge Wood Elementary School. These basins are inspected routinely and have scheduled maintenance as required.

2.6.9 Herbicide, Pesticide, and Fertilizer Management & Use

NPS has and will continue to use minimal necessary herbicides, pesticides and fertilizers. NPS Staff has attended the annual turf grass conference sponsored by Michigan State University and has developed the NPS “Facility Nutrient Management Program” based on information provided at this conference. Fertilizer is restricted for use at NPS facilities and is only used on the varsity athletic fields. Soil sampling has been conducted at the athletic fields through an extension program of Michigan State University. Fertilizer uses in these areas are based on the results of these samples and subsequent reports provided through this project.

In order to decrease fertilizer use and release organic material back into the soil NPS will use mulching mowers and leave lawn clippings on turf areas where possible. Mowing height for grass not used for athletic fields will be mowed at 3” height instead of lower heights in order to increase water uptake and transpiration and decrease stormwater flow into the watershed.

NPS has an integrated pest management plan (IPMP). The Director of Operations is responsible for review and implementation of the IPMP. This plan is reviewed at least once annually and any other modifications or changes are updated as necessary. Herbicides are only used in areas requiring curb appeal or on athletic fields if necessary.

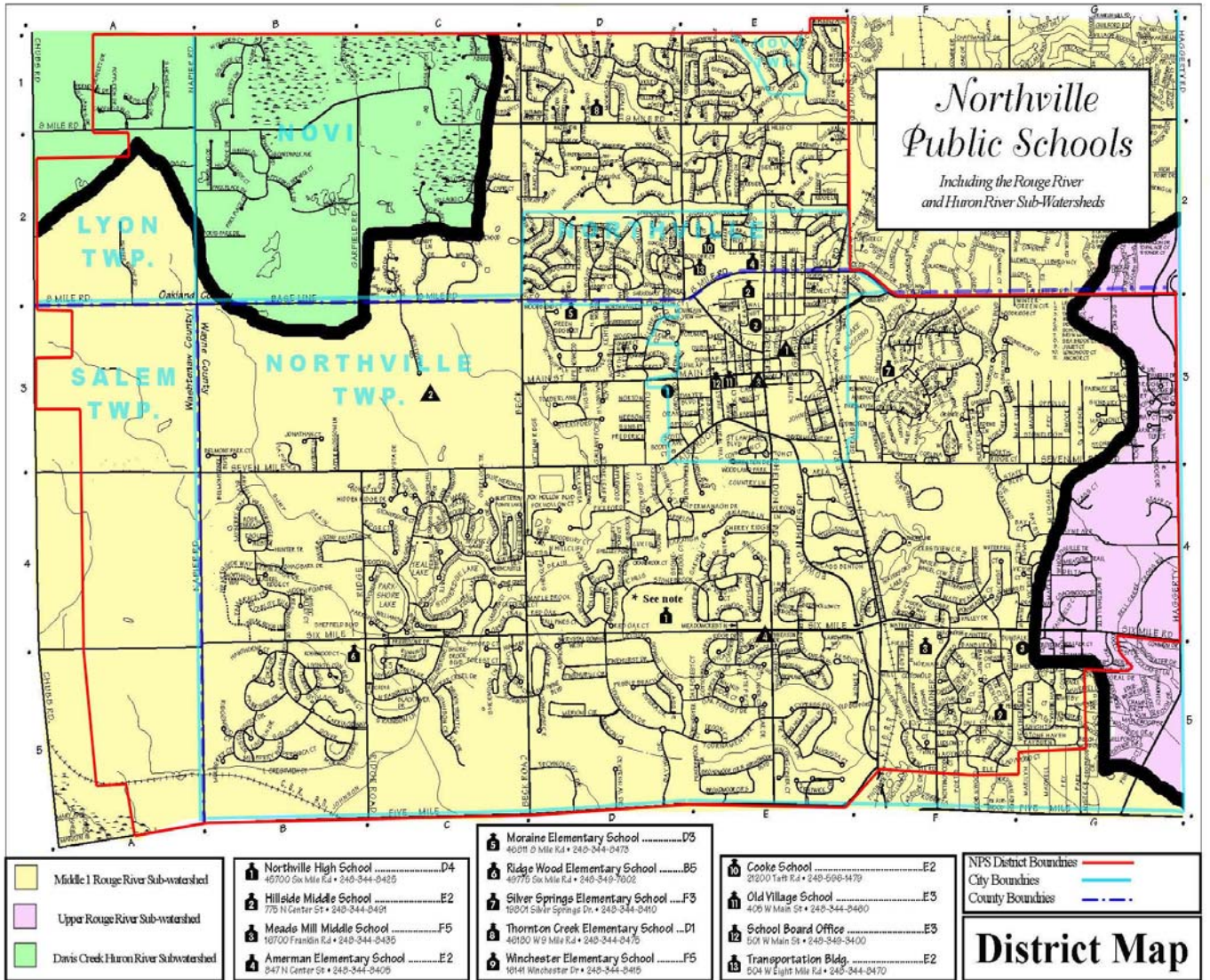
2.6.9.1 Herbicide, Pesticide, and Fertilizer Management & Use BMPs

BMP	Goal	Measurable Goal	Deadline
Integrated Pest Management Plan	To assure that pest management is done in the most effective yet least polluting manner possible.	Successful pest control documenting use of IPM methods and materials.	Current and ongoing
Facility Nutrient Management Program	To ensure that the proper types and quantities of fertilizers are used to maintain athletic turf areas and restrict use in other areas	Documentation of types and quantities of fertilizers applied	Current and ongoing
Herbicide, Pesticide, and Fertilizer Storage	Provide adequate facilities for mixing and storage of herbicides, pesticides, and fertilizers	Inspection and maintenance of storage facility areas	Current and ongoing
Fertilizer Application	To utilize and follow existing fertilizer plan designed to minimize pollutant potential to water tables and to the watershed.	Documentation times and types of fertilizers used.	Current and ongoing

APPENDIX “A”

Novi Public School District & Watershed Boundary Maps

Northville Public Schools
Storm Water Management Program



	Middle 1 Rouge River Sub-watershed
	Upper Rouge River Sub-watershed
	Davis Creek/Huron River Subwatershed

	Northville High SchoolD4 49700 Six Mile Rd • 249-344-9429
	Hillside Middle SchoolE2 778 N Center St • 249-344-9491
	Meads Mill Middle SchoolF5 10700 Franklin Rd • 249-344-9435
	Amerman Elementary SchoolE2 847 N Center St • 249-344-9426

	Moraine Elementary SchoolD3 46011 D Mile Rd • 249-344-9475
	Ridge Wood Elementary SchoolB5 49775 Six Mile Rd • 249-349-7000
	Silver Springs Elementary SchoolF3 10001 Silver Springs Dr • 249-344-9480
	Thornton Creek Elementary School ...D1 40100 W 9 Mile Rd • 249-344-9475
	Winchester Elementary SchoolF5 10141 Winchester St • 249-344-9485

	Cooke SchoolE2 29200 Taft Rd • 249-598-4479
	Old Village SchoolE3 409 W Main St • 249-344-9490
	School Board OfficeE5 501 W Main St • 249-349-3400
	Transportation Bldg.E2 504 W Eight Mile Rd • 249-344-9470

	NPS District Boundaries
	City Boundaries
	County Boundaries
District Map	

APPENDIX “B”

Northville Public Schools Project Schedule For

District Wide Dry Weather Screening, Outfall Testing, and Stormwater System Mapping Activities

Northville Public Schools
Storm Water Management Program

Northville Public Schools

Project Schedule for District Wide Stormwater Screening, Testing, Mapping Activities

Project Schedule: April 2008 - August 2009

Activity	Start Date	End Date	February		March			April			May			June			July			August								
			9	16	23	2	9	16	23	30	6	13	20	27	4	11	18	25	1	8	15	22	29	6	13	20	27	3
Prepare project schedules and MDEQ submittals	2/11/2008	2/29/2008																										
MDEQ Review period	3/3/2008	4/4/2008																										
Transportation Garage and Maintenance Facility	4/7/2008	5/30/2008																										
Northville High School	6/2/2008	7/18/2008																										
Meads Mills Middle School	7/21/2008	8/22/2008																										
Hillside Middle School	8/25/2008	10/3/2008																										
Amerman Elementary School	10/6/2008	10/31/2008																										
Moraine Elementary School	11/3/2008	11/28/2008																										
Ridge Wood Elementary School	3/2/2009	3/27/2009																										
Silver Springs Elementary School	3/30/2009	4/24/2009																										
Thornton Creek Elementary School	4/27/2009	5/22/2009																										
Winchester Elementary School	5/25/2009	6/19/2009																										
Cooke School	6/22/2009	7/17/2009																										
Old Village	7/20/2009	8/14/2009																										
School Board	8/3/2009	8/28/2009																										

Northville Public Schools
Storm Water Management Program

Northville Public Schools

Project Schedule for District Wide Stormwater Screening, Testing, Mapping Activities

Project Schedule: April 2008 - August 2009

Activity	Start Date	End Date	August			
			10	17	24	31
Prepare project schedules and MDEQ submittals	2/11/2008	2/29/2008				
MDEQ Review period	3/3/2008	4/4/2008				
Transportation Garage and Maintenance Facility	4/7/2008	5/30/2008				
Northville High School	6/2/2008	7/18/2008				
Meads Mills Middle School	7/21/2008	8/22/2008				
Hillside Middle School	8/25/2008	10/3/2008				
Amerman Elementary School	10/6/2008	10/31/2008				
Moraine Elementary School	11/3/2008	11/28/2008				
Ridge Wood Elementary School	3/2/2009	3/27/2009				
Silver Springs Elementary School	3/30/2009	4/24/2009				
Thornton Creek Elementary School	4/27/2009	5/22/2009				
Winchester Elementary School	5/25/2009	6/19/2009				
Cooke School	6/22/2009	7/17/2009				
Old Village	7/20/2009	8/14/2009				
School Board	8/3/2009	8/28/2009				

APPENDIX “C”

Northville Public Schools Hazardous Materials and Waste Spill Response Policy and Procedures

Northville Public Schools Hazardous Materials and Waste Spill Response

Policy

Northville Public Schools will comply with all Federal, State, and local regulatory requirements for the management and reporting of all hazardous materials and/or waste releases.

The Operations Department will maintain responsibility for monitoring any changes in regulatory requirements regarding hazardous materials and waste spills or accidental releases. This policy will be revised as necessary based upon any changes in the regulatory requirements or internal experiences.

All hazardous materials spills or releases will be thoroughly investigated by the Operations Department and reported to the Director of Operations. The Director of Operations will be responsible for developing, maintaining, and implementing procedures for managing hazardous materials spill response and associated employee education and training for compliance with the policy and procedures.

Purpose

This policy and associated procedures have been developed to define appropriate and safe response procedures for spill or accidental releases of hazardous materials or substances at all Northville Public Schools facilities.

Procedures

Emergency Spill Response

Each facility having the potential for the release of a hazardous material or substance shall have trained and knowledgeable staff members to respond and/or implement spill response procedures for that facility. Spill containment materials such as absorbent pigs, pads, booms, diking materials, storm drain covers, etc. are to be stored and maintained at all facilities for use by trained employees in the event of a spill or accidental release.

The following general guidelines are to be implemented as applicable in managing spills and accidental releases:

- 1) For spills in which there is no immediate dangers to employees, students, or the general public and does not represent a danger of contamination to a sanitary sewer, storm sewer, of the ground:
 - A) Contain spill to the smallest area possible.
 - B) Review the Material Safety Data Sheet for determination of proper spill handling, and appropriate personal protective equipment selection.
 - C) Place compatible absorbent material or spill pads on the area.
 - D) Clean up and containerize the absorbent materials.
 - E) Contact the Maintenance department for waste disposal instructions and additional cleaning requirements.

- 2) For a spill that represents an immediate danger to employees, students, or the general public and/or has the potential to impact the sanitary sewer, storm sewer, or the ground:
 - A) Notify the Operations Department at (248) 344-8445.
 - B) If there is the treat of fire, explosion, or if any person(s) exhibit severe symptoms of exposure, contact 911 to initiate local emergency services.
 - C) Alert anyone in the area and begin evacuation procedures.
 - D) Use booms or other absorbents to dike the spill area if safe to do so, and secure the area from unauthorized personnel. Refer to the Material Safety Data Sheet to determine the proper personal protective equipment.

Northville Public Schools
Storm Water Management Program

- E) Remove all sources of ignition for releases of flammable or combustible materials.
- F) The Operations Department will initiate all notification procedures and contact contracted emergency response company to mitigate and remediate the release.
- G) Complete the “Hazardous Material or Waste Spill Exposure Form” for all exposed persons.
- H) The Director of Operations will assess the spill and notify all agencies as required.

3) Spills of Elemental Mercury

- A) Contact the Operations Department immediately.
- B) Remove all personnel from the immediate spill area without traveling through the spill area, and if possible, close the door and lower the thermostat in the affected room.
- C) Keep all potential contaminated persons in a close area to the spill but outside of the affected area to minimize additional exposure to mercury vapors.
- D) Remove and containerize any potentially contaminated clothing or other articles from affected persons.
- E) Maintenance and Operations will contact the emergency response company to clean-up the spill and properly decontaminate and/or dispose of all contaminated articles.

This guidance has been developed in anticipation of potential releases of hazardous materials and substances. The procedures outlined in this guidance should only be implemented by those persons who have received sufficient training and are competent in the handling of the released material.

Hazardous Material or Waste Spill Exposure Form

Spill Discovered By: _____

Time of Spill/Exposure: _____

Location: _____ Date: _____

Person Notified of Spill/Exposure: _____

Material spilled/exposed to and estimated volume:

Explanation of spill/exposure:

Action taken to contain spill:

Names of person(s) injured/exposed:

Medical facility used (if applicable):

Additional comments:

Prepared By: _____

Date: _____

Director of Operations Signature: _____

Date: _____

APPENDIX “D”

Northville Public Schools Dry Weather Screening & Manhole/Catch Basin Inspection Logs

Manhole/Catch Basin Inspection Log

Manhole
ID No.

Inspection date: _____ Facility: _____

Manhole Location: _____

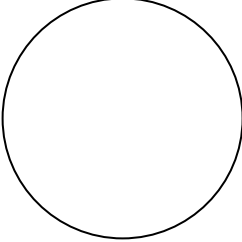
Inspection: Not found ___ Surface ___ Internal ___
Follow up inspection _____

Manhole Type:
Storm Drain _____ Sanitary _____
Catch Basin _____
Time since last rain event
<48 hrs ___ 48-72hrs ___ >72hrs ___

Inspector _____

Observations:
 Standing water: Yes ___ No ___ Color of water: clear ___ Cloudy ___ other: _____
 Flow: Yes ___ No ___ Velocity: Slow ___ Medium ___ Fast ___ Depth of flow: _____ in.
 Color of flow: No flow ___ Clear ___ Cloudy ___ Suspended solids ___ Other _____
 Blockages: Yes ___ No ___ Sediment in manhole: Yes ___ No ___ If Yes, describe: _____
 Floatables: None ___ Oily sheen ___ Foam ___ Sewage ___ Other _____
 Odor: None ___ Sewage ___ Oil ___ Soap ___ Other _____

Condition of manhole:				Diagram of manhole
	Good	Fair	Poor	Comments
Pavement	___	___	___	_____
Cover	___	___	___	_____
Frame	___	___	___	_____
Walls	___	___	___	_____
Corbel	___	___	___	_____
Floor	___	___	___	_____



Comments:

**Dry Weather Screening/
Outfall Inspection Log**

Outfall
ID No.

Inspection date: _____ Facility: _____

Outfall Location: _____

Inspection: Not found ___ Surface ___ Internal ___
Follow up inspection _____

Outfall Type: _____

Catch Basin _____ Manhole _____

Time since last rain event:
<48 hrs ___ 48-72hrs ___ >72hrs ___

Inspector _____

Observations:
 Standing water: Yes ___ No ___ Color of water: clear ___ Cloudy ___ other: _____
 Flow: Yes ___ No ___ Velocity: Slow ___ Medium ___ Fast ___ Depth of flow: _____ in.
 Color of flow: No flow ___ Clear ___ Cloudy ___ Suspended solids ___ Other _____
 Blockages: Yes ___ No ___ Sediment: Yes ___ No ___ If Yes, describe: _____
 Floatables: None ___ Oily sheen ___ Foam ___ Sewage ___ Other _____
 Odor: None ___ Sewage ___ Oil ___ Soap ___ Other _____

Condition of Outfall:	Diagram of Outfall																																					
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Picture#: _____

Sample ID: _____

Lab Report Number: _____

Comments:
