

# Attachment B

## Page 1

### **SWMP REFERENCE PROCEDURE**

The city's SWMP is available for public inspection at city hall any time a resident wished to view it. There is a link on the city web page to view it. Citizens are able to leave a comment, question or concern at city hall, on the web page or by attending one of our monthly council meetings. We offer residents a chance to come to a council meeting where we will be discussing the SWMP, so they can get any information they would like to see and make comments or inquires.

# Attachment D

## Page 1

### PEP Procedure Reference

Our procedure for evaluating and determining the effectiveness of the overall PEP is to do a bi-yearly review of the PEP requirements. We will make the PEP information available on our web site for the public to review at any time, to see any changes or updates to the PEP.

We will make any modifications to the PEP during our review process and implement any changes.

**LIST NAME OF COMMUNITY/COUNTY**  
**MUNICIPAL-OWNED STORMWATER SYSTEM**  
**Contractor Requirements and Oversight**

**POLICY #:**

**DATE:**

**I. POLICY:**

This policy is to establish procedures for requiring [City of Keego Harbor, MI. 48320/Oakland County, MI] contractors to comply with pollution prevention and good housekeeping BMPs and providing oversight to ensure compliance.

**II. BACKGROUND:**

The MDEQ NPDES Phase II Stormwater Discharge Permit Application requires a procedure for requiring contractors hired by the applicant to perform municipal operation and maintenance activities comply with all pollution prevention and good housekeeping BMPs as appropriate. This procedure also identifies how the applicant provides oversight of contractor activities to ensure compliance (Stormwater Permit Application # 84).

**III. CONTRACTOR REQUIREMENTS AND OVERSIGHT**

The contractors hired by [City of Keego Harbor, MI. 48320/Oakland County, MI] to perform municipal operations that potentially impact stormwater are required to follow appropriate pollution prevention BMPs and are listed in the following table (example included):

<b>Contractor</b>	<b>Activity</b>	<b>Stormwater BMP</b>	<b>Procedure</b>	<b>Oversight</b>
Company to be chosen for 2015	fertilizer and apply weed control to retention pond @ City Hall	maintain minimum 15' buffer around pond at City Hall	Contract language requiring contractor to follow BMPs	DPW staff provide monthly spot checks fertilizing/ weed control activities

# **BMPS and Associated Measurable Goals**

Public Education and Outreach on Storm Water Impacts Minimum Measure

**Minimum Measure Objective:** The City will educate the general public of storm quality via print, local TV access or other appropriate media.

**BMP:** Public education campaign on storm water

**Measurable goal:** The City will produce and air on civic TV a 30 second public service announcement (broadcast in conjunction with city council meeting) on storm water and what the public can do to prevent storm water impacts. These announcements will be broadcast once a month at a city council meeting for first two years of contract term. The city will conduct a survey at the end of term to ascertain changes in target audiences. Printed information will also be produced and available at city hall for residents to pick up. We will also be scheduling a public meeting to help educate residents of storm water impacts.

**Justification:** Our goal is to have a high level of exposure for our residents.

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**BMP:** Storm water education materials for restaurant owners

**Measurable Goal:** Outreach material on proper storm water management practices for restaurants will be produced within one year. Inspectors from city's code enforcement department will be trained on potential storm water violations and proper practices for restaurants within one year.

**Justification:** Restaurants have been identified as a significant contributor of oil and grease into both storm and sanitary sewers. This targeted education campaign will make the restaurant owners aware of proper

disposal and recycling practices for oil and grease and inform them of potential fines for illegal dumping into storm or sanitary sewers.

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## **PUBLIC INVOLVMENT/PARTICIPATION MINIMUM MEASURE**

**Minimum Measure Objective:** Involve stakeholder groups, including local governments, business, and citizens, in making decisions about storm water management priorities and programs.

**BMP:** Hold public meetings to receive input on proposed program

**Measurable Goal:** Meetings will be held on city's proposed storm water management program. These will be held bi-yearly and information will be available to attendees.

**Justification:** Public meetings are an excellent way to inform residents about storm water impacts in addition to gaining support for the proposed storm water program. Key issues, those that affect the public, can be described during those meetings to increase awareness about citizen responsibility, costs, and benefits.

**BMP:** Coordination meeting

**Measurable Goal:** The city will annually hold a meeting involving residents, business owners, and regulatory agencies identifying common goals, such as improving water quality. Responsibilities for tasks that further these common goals can be divided among these parties to use funding and labor efficiently.

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## **ILLICIT DISCHARGE DETECTION and ELIMINATION MINIMUM MEASURE**

**Minimum Measure Objectives:** Develop a comprehensive map of the storm drain system, establish and carry out procedures to identify and remove illicit discharges, establish legal authority for enforcement actions,

and encourage public education and involvement in eliminating illicit discharges.

**BMP:** Storm drain system map

**Measurable Goal:** A storm drain system map will be developed in the first year.

**Justification:** This map will aid the municipality in targeting outfalls with dry weather flows and other suspicious discharges for more in-depth inspections and monitoring and will help coordinate management activities to remove illicit connections and track storm system maintenance.

**BMP:** Identify illicit connections through dry weather screening and targeted inspections

**Measurable Goals:** A survey during dry weather of 20% of the storm drain system outfalls per year will be conducted to identify non-storm water flows. Once each year's survey is complete, areas with suspicious discharges will be inspected to detect suspected direct connections to the wastewater system and identify areas where wastewater might be leaking into adjacent storm pipes.

**Justification:** The municipality contains many older neighborhoods that will be the initial focus of the illicit discharge identification effort. Deteriorating infrastructure and questionable building codes at the time might have resulted in direct connected and/or leaking wastewater pipes. Targeted video inspections in areas with high nutrient levels, appearance of suds or oily discharges, or dry weather flows will efficiently identify these connections.

**BMP:** Illicit discharge/illegal dumping hotline

**Measurable Goal:** A hotline for residents to report illegal dumping and suspicious discharges will be established. The hotline will be advertised at city hall and on civic TV at city council meetings periodically through the year.

**Justification:** This hotline will supplement the municipality's effort to target outfalls for inspection and will facilitate the cleanup and remediation of dumping sites. Also, advertising the hotline will improve public involvement and will serve as an educational tool to inform the public about the hazards of illicit discharges and illegal dumping.

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## **CONSTRUCTION SITE RUNOFF CONTROL MINIMUM MEASURE**

**Minimum Measure Objective:** Establish a set minimum erosion and sediment control (ESC) requirements for construction sites that disturb more than 5,000 square feet, including planning, installation, inspection, and maintenance of ESC practices.

**BMP:** Require ESC plans for any land disturbance greater than 5000 square feet

**Measurable Goal:** An ordinance and guidance will be prepared within one year. A final ordinance and ESC guidance will be available within two years.

**Justification:** Small construction sites have been shown to contribute as much sediment as large sites on a per acre basis. Therefore, planning for erosion and sediment control practices and procedures in advance of starting construction is an important step in preventing sediment from entering the MS4.

**BMP:** Require the use of appropriate controls on construction sites

**Measurable Goal:** ESC requirements will be revised to require all construction sites on slopes in excess of 5% and in all areas where calculations indicate pooling of water behind the structure to use steel reinforced silt fencing. Additional requirements include proper installation and maintenance of these and other perimeter controls.

**Justification:** Traditional perimeter controls, such as standard silt fence, have a higher failure rates when water pools behind the control. Requiring steel reinforced silt fence, which is standard silt fence fortified with chain link fencing and steel stakes, in critical areas will reduce damage to perimeter controls during storms.

**BMP:** Develop a certification program for contractors

**Measurable Goal:** Achieve 80% compliance with ESC requirements by end of the permit term

**Justification:** Educating contractors about the proper selection, installation, and maintenance of BMP's will help ensure compliance with ESC requirements.

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## **POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT/REDEVELOPMENT MINIMUM MEASURE**

**Minimum Measure Objective:** Reduce the volume and improve the quality of storm water runoff by disconnecting impervious surfaces and maintain structural storm water controls

**BMP:** Reduce directly connected impervious surfaces in new developments and redevelopment projects by requiring that grassed swales or filter strips be installed along roadsides in lieu of curbs and gutters.



**Measurable Goals:** Conduct an inventory of structural runoff controls. Develop a GIS to integrate the location of these controls with schedules for regular inspections and maintenance as prescribed for each type of practice.

**Justification:** There are many structural controls located throughout the city that are owned and operated by both public and private entities. A complete list of BMPs and their locations and site conditions will be compiled. An inspection and maintenance schedule can be developed to maximize efficiency and minimize labor requirements. The system can be expanded to include other types of MS4 maintenance, including street sweeping, catch basin cleaning, storm drain flushing, etc.

**BMP:** Develop and implement a storm ordinance and guidance or a design manual that includes performance standards to control runoff impacts.

**Measurable Goal:** By year 3 of the permit term, 95% of all building permits will include descriptions and plan regarding storm water control and practices and site designs that comply with the criteria and guidance specified or referenced in the municipal code.

**Justification:** Ordinances are an effective way to establish performance standards for runoff controls. These performance standards might, for example, specify a target for percent removal of annual post-development total suspended solids loadings, require maintenance of annual ground water recharge rates, or limit runoff volumes and rates such a that receiving waters are not negatively impacted.

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## **POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS MINIMUM MEASURE**

**Minimum Measure Objective:** Reduce the amount of nutrients entering receiving waters through education of municipal employees about lawn care activities, spill prevention and control, and vehicle washing.

**BMP:** develop spill prevention and control plans for municipal facilities

**Measurable Goal:** develop plans describing spill prevention and control procedures by end of year 1. Conduct annual spill prevention and response training sessions for all municipal employees. Distribute educational materials, e.g., posters and pamphlets, to each municipal facility by end of year 2.

**Justification:** Municipal employees do not receive formal training in spill prevention and containment practices, but in recent years spills have resulted in hazardous chemicals reaching the storm drain system due to improper handling and containment procedures. The poster, which will be posted in chemical storage areas, will describe materials and techniques that should be used to contain a spill as well as preventative measures that can reduce the likelihood of spills.

# Attachment E

## Page 1

Section a.

### IDEP procedures

Dry-weather screening will be completed in accordance with the prioritized areas identified for the purpose of maximizing the detection and elimination of illicit discharges

Dry-weather screening will be completed, at a minimum of 48 hours after any precipitation, and include observations of the receiving water characteristics, discharge pipe characteristics and flows. The observations will include:

Presence/absence of flow; water clarity, color, odor and floatable materials; deposits/stains on

The discharge structure or bank; vegetation condition of receiving water; structural condition of discharge pipe; and biology, such as bacterial sheens, algae, and slimes; and staining of the banks and unusual vegetative growth.

If flow is observed from the outfall or point of discharge, then the responsible applicants/permittees commit to do one of the following:

1. If by observation it is obvious that an illicit discharge is present and the source is obvious, the City of Keego Harbor/DPW will document the observations and source for follow-up by the responsible permittees. The City of Keego Harbor/DPW, will notify the responsible permittees in writing within 10 days of detection and provide all applicable observation information, including the date and location where the illicit discharge was detected and the obvious source. The illicit discharge will be eliminated.
2. If flow is observed and the source is not obvious, the City of Keego Harbor/DPW, will conduct a field screening of the dry-weather flow to analyze the discharge for the

following indicator parameters: ammonia, fluoride, detergents, and pH.

Field screening will be conducted at a minimum of two times within two-weeks of the initial observation to determine if flow is intermittent or constant. The City of Keego Harbor/DPW, will notify the responsible permittees in writing within 30 days of detection and given all applicable field information, including the date and location where the illicit discharge was detected. All responsible permittees where the illicit discharge was detected will perform dry-weather screening of their outfalls and points of discharge in the jointly operated MS4 within 13 months of detection, unless the illicit discharge is eliminated or identified in a portion of the MS4 not influenced by discharges from the responsible permittee's outfalls or points of discharge. **The goal is to eliminate any illicit discharge within 30 days of discovery.**

### **IDEP Procedure Reference**

Our procedure for performing field observations at all outfalls and points of discharge are as follows; DPW is to make a visual inspection of all IDEP locations twice yearly. Inspections will be done to locate any potential illicit discharges, if found, field screening will analyzed for indicator parameters, such as; ammonia, fluoride, detergents, and pH. The first inspections will coincide with the dispersing of mosquito baits. If DPW becomes aware of an IDEP, we will complete a report and fill out the appropriate paperwork, within one week of illicit discharge identification. If action is needed to be taken to eliminate discharge, code enforcement will be sent out to investigate and have it taken care of. If it is a legal IDEP locating, a location report will be added to our IDEP file and the above inspection procedures will apply to that location. This same procedure will be followed for illicit discharge that is non-toxic.

The focus of our observations will be;

- Presents/Absence of flow
- Deposits/stains on discharge structure or bank
- Vegetation condition
- Biology, such as bacteria sheens, algae, and slimes
- Water clarity
- Color
- Odor
- Floatable materials

## Section b.

If an IDEP investigation on a source that is not identified on a field screening, a source investigation will be performed. The above guidelines will be followed to complete the investigation.

A sample of **any dry weather flow from an outfall where the source is not obvious** will be sent for testing within 1-2 days from discovery.

**If there is a discharge of any polluting material from a city MS4 to surface waters or groundwaters of the state, unless a determination is made that the release is not in excess of the threshold reporting quantities in the Part 5 Rules, DEQ will be contacted (see below for contact information).**

MDEQ

SE Michigan District Office

27700 Donald Court

Warren, MI. 48092

Phone# 586-753-3700 (non-emergency number)

**\*\*24 Hour HOTLINE**

Pollution Emergency Alerting System (PEAS)

1-800-292-4706

A full report will be given at that time indicating any complaints and the outcome of investigation.

## **Section C – IDEP Training and Evaluation**

Staff training is an ongoing procedure, all DPW staff has taken IDEP CD training provided by MDEQ, and we will schedule yearly training **for new and existing staff** through a government agency **or in-house** every year.

Examples:

Storm Water Employee Training Video;

Importance of preventing contamination from storm water run off

Point Source Discharges

Identifying Significant Materials etc.

**Evaluating and determining the overall effectiveness of the IDEP**

The City will determine effectiveness of their IDEP on an annual basis by evaluating the number of discharges and evaluating program efficiency and staff training frequency.

**Section D-BMP's for facilities with medium or low potential for discharge of pollutants:**

Daily/weekly cleaning, sweeping and general good housekeeping are practiced on a regular and ongoing basis.

Questions 21 & 22: We will present a revised ordinance addressing these two issues. Projected time to revise (6 Months) from the effective date of our new MS4 permit.

## Attachment F

### Structural Storm Water Operation and Maintenance Activities

Our catch basins are inspected at a minimum of twice a year, spring and fall (so there is no priority, all are treated equal). They are routinely cleaned out throughout the summer months. We have a public general complaint system set in place to allow any resident or business to notify the city of any issues with any drain, catch basin, vegetated swale, etc. Upon receiving any complaint, these complaints are given to either the DPW to inspect and maintain or to the code enforcement office to have the owner respond and correct any problems. Any issues that are not handled in a timely manner will be issued a written letter by code enforcement, if that fails, further acting is taken by code enforcement.

Every person owning property through which a watercourse passes, or such person's lessee(s), shall keep and maintain that part of the watercourse within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse. This responsibility does not apply to publicly or privately owned drains that are not owned by the property owner and are otherwise the responsibility of the drain owner. In addition, the owner or lessee shall maintain existing privately owned structures within or adjacent to a watercourse, so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse.

#### **POLICY ON POST CONSTRUCTION STORMWATER RUNOFF FOR NEW DEVELOPMENT AND REDEVELOPMENT**

It is and shall be the policy of the City of Keego Harbor to regulate stormwater discharges. Stormwater detention and treatment for stormwater quality and channel protection are required. Keego Harbor's policies and procedures regarding stormwater detention for flood control remain in effect and unaltered by this policy. As necessary, Keego Harbor will adopt and implement ordinances as necessary to enforce water quality and channel protection standards. Keego Harbor requires all developments and re-developments that disturb one (1) acre or more (including projects less than one (1) acre that are part of a larger common plan of development or sale that would disturb one (1) acre or more) to adhere to the applicable requirements provided by the Oakland County Drain Commissioner and/or the Oakland County Road Commission. Compliance with said requirements is subject to review and approval by the City engineer.

#### **Municipal Facility and Structural Storm Water Control Inventory Pollution Prevention/Good Housekeeping Program**

Item 62: the procedure for updating and revising our inventory is done through our yearly inspections and weekly rotating maintenance. Any new or deleted sources are identified at this time and added or removed on our map and logged into our system for updates to our MS4 within 30 days from inspection date.

Our grass swales throughout the city; ones in front of private property are maintained by homeowner/business owner and routinely inspected **at least monthly** by city to make sure they are compliant. Swales owned by city are maintained by DPW, which routinely mow and remove any debris to maintain proper water flow.

Any culverts owned by city are routinely inspected **at least monthly** for proper flow and maintained by city or with assistance through Oakland County if water jetting is needed to clean pipes for proper water flow.

# Attachment A

## Page 1

### Enforcement Response Procedure (ERP)

In the event of a violation of any of the City of Keego Harbor's ordinances listed below, the city code enforcement officer will be sent out to inspect violation, upon verification of violation, a written notice is mailed to violator. A set time frame is set to comply with ordinance and rectify the violation. In the event the violation is not corrected to a satisfactory status, a citation will be sent out, stating the violation will be rectified by an outside source and a fine and or charge for service performed will be levied to property owner.

These notices/citations/ are to include; the date of violation, property owners name, location of violation, and the ordinance that is in violation.

Each ordinance/regulatory mechanism within this jurisdiction includes an enforcement response to violations of the ordinance. The ordinances referenced in this application include:

- INSERT LIST OF ORDINANCES/Regulatory Mechanisms cited in Application:
- Ordinance No. 401
- Stormwater Post-Construction (OCWRC Engineering Design Standards – to be updated and adopted in 2017)
- See attached Stormwater Ordinance Page
- Illicit Discharge Elimination Ordinance:
- Ordinance No. 438 / Section 1.01

### ENFORCEMENT TRACKING

A hard copy and computer record of the violations will be kept at city hall. They will include above information, also the enforcement used, and a schedule for returning to compliance, including the date violation was resolved.



CITY OF KEEGO HARBOR

ORDINANCE NO. 438

AN ORDINANCE TO AMEND THE CITY OF KEEGO HARBOR CODE, CHAPTER 10, ENVIRONMENT, ARTICLE II, NUISANCES TO ADD DIVISION 3 ILLICIT DISCHARGE ELIMINATION PLAN, TO READ AS FOLLOWS:

THE CITY OF KEEGO HARBOR ORDAINS:

**Section 1.01**

**Sec. 10.59 Definitions.**

The following words, terms and phrases, when used in this Ordinance, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning:

*Authorized enforcement agency* means the city engineer and his/her authorized representatives, which shall specifically include all inspectors and code enforcement, and any other individual designated by the City Manager of Keego Harbor to enforce this Ordinance. Where applicable the terms may also mean the director of the Michigan Department of Environmental Quality or his/her designated official, and/or the United States EPA Administrator or his/her designated official.

*Best Management Practices (BMPs)* means schedules of activities, prohibitions of practices, general good housekeeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or stormwater conveyance systems. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

*City* means the City of Keego Harbor.

*Clean Water Act* means the federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.), and any subsequent amendments thereto.

*County* means the County of Oakland.

*Construction activity* means activities subject to NPDES construction permits. These include construction projects resulting in land disturbance of five acres or more requiring an issued permit and small construction activities impacting one to five acres of land deemed to operate under a national permit. Such activities include but are not limited to clearing and grubbing, grading, excavating, and demolition.

*Hazardous materials* means any material, including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

*Illegal discharge* means any direct or indirect non-stormwater discharge to the storm drain system, except as exempted in section 10.64(b) of this Ordinance.

## **Attachment G**

### **Page 1**

#### **Municipal Operations and Maintenance Activities**

Any and all areas are kept swept and general good housekeeping is practiced by all workers.

Drain covers are lined with fabric when any construction and work is done to keep out dirt and debris, covers in low lying areas prone to soil runoff are permanently lined with fabric to aid in the removal of dirt and debris

All catch basins, drain covers and curb lines are cleaned a minimum of twice a year (swept, and collected by DPW) or as needed to keep clear of trash and debris.

All streets are swept and maintained on a regular basis, including using a power sweeper; this service is done on a bi-weekly basis and is available on an as needed basis for any issues that present themselves.

All roads are low priority as there are not curbed streets (so there is no buildup of debris along edge); all roadways are routinely swept on a rotating schedule through the year or as needed per emergency situation.

Any disposal of street sweeper waste is hauled off by licensed company.

Our main roadways are swept using a sweeper truck, by Oakland County Road Commission twice a year

Drains, covers and catch basins are visually inspected on a biweekly basis while performing regular city maintenance. Any possible pollutant noticed would then be addressed by DPW, code enforcement, or ultimately DEQ to investigate source and steps to rectify the situation

#### **VEHICLE CLEANING:**

Police cars are taken to local automatic carwash for routine cleaning.

DPW salt truck is emptied in salt bin (which was designed to retain all salt) then cleaned inside the DPW garage where the wash water goes to the sanitary sewer or taken to commercial car wash to power wash.

Plowing and snow piles are plowed onto green spaces to allow melting and filtering naturally.

Any and all debris/dirt left behind from any vehicle cleaning, is promptly swept up and disposed of properly.

This map represents all storm water entries, the priority level on all our city intakes is at a low level as far as maintenance, all drains are cleaned and maintained on a regularly scheduled basis.

## Item 76

Any new city owned or operated facilities or new structural storm water controls for water quantity will be designed and implemented in accordance with post-construction storm water runoff control performance standards and long-term operation and maintenance requirements



# City of Keego Harbor

2025 Beechmont

Keego Harbor, Michigan 48320

December 6 2013

Martin Hedges  
Senior Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Water Resources Division  
27700 Donald Court  
Warren, MI 48092-2793

Dear Mr. Hedges:

The City of Keego Harbor has been engaged in stormwater management and local watershed activities for several years. The City has recently reviewed its MS4 stormwater permit, and as a result, developed a Pollution Incident Prevention Plan (PIPP) for storage of road salt in excess of 5 tons. The City of Keego Harbor is in Compliance with part 5 rules, as outlined in the PIPP. A copy of the PIPP will be maintained at the Keego Harbor City Hall and is available upon request.

This letter serves as a certification of compliance with Part 5 rules for storage of road salt.

Sincerely,

Douglas Walden  
DPW Foreman  
Email: [walden@keegoharbor.org](mailto:walden@keegoharbor.org)

City of Keego Harbor  
Department of Public Works Facility

MICHIGAN DEPARTMENT OF NATURAL  
RESOURCES AND ENVIRONMENT  
PART 5 RULES

Pollution Incident Prevention Plan

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# Chapter 1: General Facility Information

Table 1: General Facility information

NAME OF FACILITY:	Keego Harbor Department of Public Works (DPW) Facility
FACILITY ADDRESS:	2010 Maddy Lane, Keego Harbor, MI 48320
FACILITY CONTACT INFORMATION	
Name and Title:	Kenneth Hurst, DPW Manager
Mailing Address:	2025 Beechmont, Keego Harbor, MI 48320
Telephone:	248-682-3030
Email:	<a href="mailto:hurst@khpd.org">hurst@khpd.org</a>
SPILL PREVENTION AND CONTROL COORDINATOR	
Name and title:	Doug Waldon, DPW
Telephone:	248-682-1930
Email:	<a href="mailto:Waldon@keegoharbor.org">Waldon@keegoharbor.org</a>
24-Hour Emergency Telephone:	Cell: (248) 212-1997

## Chapter 2: Spill Response Team

The City of Keego Harbor DPW Maintenance Garage houses vehicles and small amounts of materials for vehicle road maintenance. The facility also stores road salt in threshold management quantities that require the development of a Pollution Incident Prevention Plan (PIPP). The Keego Harbor DPW staff identified to assist in pollution incident prevention activities is as follows:

Table 2: Spill Response Team

NAME AND TITLE	RESPONSIBILITY
Kenneth Hurst, DPW Manager Building Official	Spill Response Program Oversight and Surveillance Activities
Doug Waldon	Onsite Spill Prevention and Control

## Chapter 3: Site Map.

The Keego Harbor DPW Facility consists of three buildings, areas for outdoor bulk material storage. The three buildings consist of:

1. Maintenance Garage
2. Storage Shed
3. Salt Barn

All vehicles and equipment are parked inside the Maintenance Garage (1) at all times. All vehicle and equipment maintenance is also performed indoors inside the Maintenance Garage. The Maintenance Garage shares the asphalt parking lot with Keego Harbor Police Department. The Salt Barn (3) is located on the Middle West side of the property and is surrounded by a gravel lot. The gravel lot is surrounded by a raised berm planted with arborvitae trees and shrubs.

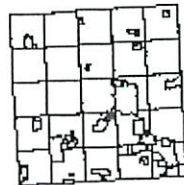


# KEEGO HARBOR City Hall/DPW



Disclaimer: The information provided in this system has been compiled from recorded deeds, plats, tax maps, surveys and other public records and data. It is not a legally recorded map or survey and is not intended to be used as one. Users of this data are hereby notified that the information sources mentioned above should be consulted for verification of the information.

Map Printed on: 3/6/2013



Legend	
	Selected Features
	PLSS Section
	Tax Parcel
	Lot
	Highway and Freeway
	Interstates
	US Highways
	State Highways
	Major and Minor Road
	Major Roads
	Minor Roads
	Subdivision
	Municipal Boundary
	Water Area
	Swamp or Marsh
	Lake or Pond
	Stream or River
	Current Imagery

# Chapter 4: Polluting Material Inventory

## Inventory and Description of Polluting Materials

To identify potential sources of significant materials, City staff, with the assistance of the Southeast Michigan Council of Governments (SEMCOG) conducted an inventory of municipal buildings, activities and materials that may be identified as polluting materials under Part 5 at the Keego Harbor DPW Facility. Polluting materials that are listed under Part 5 and stored onsite at the Keego Harbor DPW Facility include the following:

- Salt in excess of 5 tons in solid form
- MSDS stored in main office of the City Hall.

### Solid Salt Storage Area Description

The Keego Harbor DPW Facility stores road salt inside covered Salt Barn the middle west side of the property. The Salt Barn has a shingled roof, concrete floor, 5'concrete footer walls topped with plywood walls. The capacity of the Salt barn is approximately 100 tons. The loading area outside of the Salt Barn consists of an asphalt pad. There are no interior floor drains inside the Barn.

Salt is delivered to the Keego Harbor DPW Facility and is placed just outside the Salt Barn. Salt deliveries only occur between the hours of 7:30 a.m.-3:00p.m., so that a staff person can be present onsite during all salt deliveries to direct where and how the salt is delivered. After the salt is unloaded from the delivery truck, Orchard Lake staff then immediately load the salt into the barn using a front end loader. Employees are trained in the procedure to immediately sweep excess salt from track out or spills back into the barn;

The Keego Harbor DPW Maintenance Garage performs onsite maintenance for the vehicles and equipment used in the department, including the loader and dumps trucks used for snow and salt activities. These vehicles are store on site and washed inside the Maintenance Garage.

The DPW Yard has an access gate that remains locked when not in use and during non-business hours. The property is mostly surrounded by a raised berm with planted vegetation. The complex is shared by the Keego Harbor Police Department vehicle housing that has a 24-hour police shift in process daily.

The salt dome is not located within 50 feet of a lake shore, stream bank, or wetland, nor is it located in a 100-year floodplain.

### Spill Response Procedures and Equipment

Spill Response Procedures and a Spill Response Form have been created for the Keego Harbor Facility and are located in Appendix C.

## Chapter 5: Routine Inspections

Preventive maintenance at the Keego Harbor DPW Facility involves the regular inspection, testing, and cleaning of facility equipment, vehicles, and operational systems. A Routine Inspection Form has been created for the Keego Harbor DPW Facility and is located in **Appendix A**. The Routine Inspection Form will be used by facility staff during site walk-throughs that will be conducted on a monthly basis to observe the salt storage area. The purpose of these inspections is to identify and prevent conditions that could lead to the release of polluting materials to sewers, drains, or otherwise directly or indirectly into any public sewer system or to the surface or groundwater's of this state. Good housekeeping procedures reduce the potential for pollutants to come into contact with the environment. A log of the routine inspections and corrective actions shall be maintained on file and shall be retained for three years.

## Chapter 6: Three-Year Plan Review

The completed PIPP requires that the City of Keego Harbor will notify the MDNRE Water Bureau District Office within 30 days at:

SE Michigan District Office  
27700 Donald CT  
Warren, MI 48092-2793  
(586) 753-3700

Keego Harbor will also notify the following agencies that the PIPP requirements have been completed:

Oakland County Health Department  
Health Administration, County Service Center  
1200 North Telegraph, Building 34 East  
Pontiac, Michigan 48341  
Phone: 248-858-1280

Local Emergency Planning Committee  
Ms. Tricia Smith  
1200 N. Telegraph. Rd., Dept. 410  
Pontiac, MI 48341-0410  
Phone: 248-858-5371

Part 5 requires that the PIPP be evaluated every three years and after any release requiring implementation of the plan. The Plan will also be updated if any facility personnel, processes, materials, or procedures that were included in the plan change (See **Appendix C** for PIPP Review Form).

Based on the three-year review, the Keego Harbor DPW Facility will amend the PIPP as needed to ensure continued compliance with the terms and conditions of Part 5. Recertification and re-notification of updates need to be sent to the MDNRE District Office, the Oakland County Health Department, and the Local Emergency Planning Committee.

Keego Harbor DPW Facility will maintain records of all PIPP-related inspections and activities, including Routine Inspections, Three-Year Review, and Spill Reports. Records will also be kept describing other illicit discharges that can affect the quality of stormwater runoff. All such records will be retained for three years.

# Appendix A: PIPP Routine Inspection Form

Date:	Facility Name:
Inspector Name:	
Routine Inspection Schedule: Monthly	

## Salt Storage Area

Check Box	Method	Comment/Action Taken
	Inspect roof of salt barn for holes and loose shingles. <i>(If defects are detected, schedule facility for necessary repairs.)</i>	
	Inspect the outside of the salt dome to look for seepage of Salt outside of the structure. Inspect joints between the floor and the walls, the roof and the walls, and all areas of the ground. <i>(If material is detected, clean up salt immediately and schedule facility for necessary repairs.)</i>	
	During salt deliveries, ensure staff is present to prevent salt from entering storm drains and to immediately load salt into barn. <i>Do not allow deliveries to stand outside of the barn uncovered</i>	
	Salt storage area is swept to contain track out to the barn, <i>(hosed down the area)</i>	
	Check loading/unloading equipment for leaks, through a vehicle/equipment inspection	
	Wash equipment and vehicles in designated inside bay where the water goes to the sanitary sewer.	

# Appendix B: Three-Year PIPP Review Form

Date of Review:

REVIEWER NAME

PRINT NAME	SIGNATURE
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1) Facility general information and Spill Response Team information is current and accurate	Yes	No
2) Site map is current and accurate	Yes	No
3) Polluting material inventory is current and accurate	Yes	No
4) New exposures, processes and related controls have been documented	Yes	No
5) Spills have been recorded and reported as appropriate	Yes	No
6) Review Routine Inspections and have all forms available	Yes	No
7) Review spill reports (if applicable)		
8) Review Spill Response Procedures and phone numbers for updates		
10) Ensure Material Safety Data Sheets are up-to-date and available for all chemicals onsite		

Additional Comments:

## Appendix C: Keego Harbor DPW Facility Spill Response Plan

EMERGENCY NUMBERS (to be posted at key telephones throughout facility)

Agency Name	Phone Number
<b>Local Fire Department</b>	
Emergency	911
Nonemergency West Bloomfield Dispatch	248-975-9200
<b>Police</b>	
Emergency	911
<b>Oakland County Environmental Health Department</b>	
Nonemergency	248-858-1352
<b>U.S. Coast Guard</b>	
National Response Center	800-424-8802
<b>Michigan Department of Natural Resources and Environment (MDNRE)</b>	
8:00 a.m.-5:00 p.m. Southeast Michigan District Office	(586) 753-3700
After Hours: PEAS Hotline	1-800-292-4706

## **SPILL RESPONSE PLAN – For Salt (Greater than 50 pounds)**

1. Make sure area is safe for entry and the spill does not pose an immediate threat to health or safety of responder
2. Stop source of spill (plug hole, upright the container, shut off valve)
3. Check for hazards (flammable material, noxious fumes, cause of spill). If flammable liquid is spilled, Turn off engines and nearby electrical equipment. If serious hazards are present leave the area and call 911.
4. Call Kenneth Hurst on cell phone at (248) 431-7291 to make him aware of the spill and potential dangers. Kenneth will notify police and fire departments if necessary for possible lane closure and need for assistance.
5. **LARGE SPILLS MAY PRESENT A HAZARD AND REQUIRE SPILL RESPONSE SERVICES FROM THE FIRE DEPARTMENT. TIDS DETERMINATION TO BE MADE BY THE SPILL RESPONSE COORDINATOR.**
6. Protect all drains from spilled material (use absorbent or other material as necessary, cover or plug drain)
  - a. Two spill kits are located inside the DPW Building. Brooms and shovels are available to sweep salt back into the barn. A loader is available on site for large spills.
  - b. The MSDS for salt is kept in City Hall's Administrative Office.
7. Stop spill from spreading (use absorbent or other diking material such as sand, dirt, etc.)
8. For spills of materials indoors, clean up spilled material with absorbents, oil dry, etc. (Do not flush with water). If material is spilled outside, a clean-up service may be required.
9. Spilled salt will be swept up and either transferred to the Salt Barn, or into a truck for road application use. Industry standards will be followed regarding usage concentration and application rates using normally accepted practices.
10. Dispose of cleaned material/absorbent into secure container for proper disposal.
11. A call to PEAS at 800-292-4706 will be made to report the release.

12. Written report MUST be submitted within 10 days after the release to:

- a. MDNRE Water Bureau Chief  
525 West Allegan Street  
P.O. Box 30473  
Lansing, MI 48909-7973
- b. Oakland County Health Department  
2100 Pontiac Lake Road  
Executive Office Building, Bldg. 41W  
Waterford, MI 48328

### SPILL RESPONSE EQUIPMENT

- Push broom
- Bucket loader
- 10 -15" x 19" absorbent pads
- 2 -3" x 48" socs
- 1 - pair nitrate gloves
- 1 disposable bag



## Appendix D: SPILL REPORTING SHEET

Date of Incident	
Time of Incident	
Location & Cross Streets	
Type of Spill	
Estimated Quantity	
Reported To	
Time Reported	
Responsible Party	
Address	
Phone Number/Contact	
Describe materials used to clean up spill:	
Describe response measures that have been done, and the schedule for completion of other measures to be taken, or both	
Describe measures taken to prevent recurrence of similar releases	
Completed By:	

### Additional Notes: