PREPARED FOR:
GRAND LEDGE PUBLIC SCHOOLS
220 LAMSON STREET
GRAND LEDGE, MI

STORM WATER MANAGEMENT PLAN

FOR THE DESIGNATED FACILITY:
GRAND LEDGE PS MS4-EATON

PERMIT NUMBER:
MIS040002

PREPARED BY:
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1.0 INTRODUCTION

1.1 BACKGROUND

Storm water runoff from lands modified by human activities can harm surface waters and, in turn, can change natural hydrologic patterns, accelerate natural stream flows, destroy aquatic habitat, and elevate pollutant concentrations and loadings. Urbanization alters the natural infiltration capability of the land and increases the amount of impervious surfaces within a watershed. Runoff, especially from urbanized areas, may contain high levels of contaminants, such as sediment, suspended solids, and chemicals from human activities.

In addition to pollutants being picked up by runoff, discharges from storm systems often include wastes and wastewater from non-storm water sources, referred to as illicit discharges. Municipal storm sewer systems are not designed to accept, process, or discharge such wastes. Sources include sanitary wastewater drains connected to the storm drain system; effluent from septic systems; car wash, laundry, and other industrial wastewaters; improper disposal of auto and household products (e.g., used motor oil and pesticides); and, spills from roadways.

In 1972, Congress amended the Clean Water Act (CWA) to prohibit the discharge of any pollutant to waters of the United States from a point source, unless the discharge is authorized by a permit. The permit process is governed by the National Pollutant Discharge Elimination System (NPDES).

In 1987, Congress again amended the CWA to require implementation, in two phases, of a comprehensive national program for addressing storm water discharges. The first phase, referred to as Phase I, required NPDES permits for medium and large municipal storm water systems, certain categories of industrial activity impacting storm water, and construction 'disturbing more than five acres resulting in storm water discharge from the site.

In 1999, the United States Environmental Protection Agency (U.S. EPA) promulgated the regulation entitled "National Pollutant Discharge Elimination System - Regulations for Revision of the Water Pollution Control Program Addressing Storm Water Discharges" (Federal Register, Volume 64, Number 235, pages 68722-68852). This is known as the Storm Water Phase II Final Rule. The rule regulates storm water discharges from two categories:

- First, the rule covers storm water discharges to certain small Municipal Separate Storm Water Systems (MS4s). Public entities which operate MS4s may be regulated under this rule.
- Second, the rule covers discharges from construction activity generally disturbing between 1 and 5 acres. A certified construction storm water operator (CSWO) who inspects the site can include an owner, developer, contractor, or subcontractor, but the permittee must be the land owner or recorded easement holder.

In Michigan, the Michigan Department of Environmental Quality (DEQ) has been granted jurisdiction for implementing the CWA and managing the Phase II rules. Michigan has developed two general permits; one providing watershed coverage, and the second providing jurisdictional coverage.

1.2 REGULATORY CONTEXT

The Storm Water Phase II Final Rule requires the owner/operator of a small MS4 to obtain NPDES permit coverage because a MS4 is defined as a point source discharge (PSD) of storm water into discrete conveyances, including roads with drainage systems and municipal streets, ultimately discharging into a receiving body of water. The rules are outlined in 40 CFR 122.

According to 40 CFR 122.26(b)(8), "municipal separate storm sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

- Owned or operated by a State, city, town, borough, county, parish, district, or other public body...that discharges into waters of the United States;
- Designed or used for collecting or conveying storm water;
- Which is not a combined sewer; and,
- Which is not part of a Publicly-Owned Treatment Works (POTW)."

Specifically, MS4s within an urbanized area, as defined by the 2002 United States Census, must obtain coverage under the General Permit, either individually, or within a cooperative watershed group. The individual permit is referred to as a Jurisdictional General Permit.

The Phase II rules outline six minimum measures for a government unit that owns or operates a MS4 to implement in order to obtain coverage under the Jurisdictional General Permit for storm water discharge. The six minimum measures are designed to improve the quality of storm water discharged from such MS4s.

The permit requires development and implementation of a Storm Water Management Program that outlines how the MS4 will address the six minimum measures using a series of Best Management Practices (BMPs), and defining measurable goals to monitor the improvement in storm water discharge. The program must be documented in a Storm Water Management Plan (SWMP).

Grand Ledge Public Schools (GLPS) has elected to obtain coverage under the Jurisdictional General Permit. This SWMP covers the entire district and each of its facilities. Specifically, this SWMP covers the following district facilities:

GLPS Facility	**Address**
Central Administration (Sawdon)	220 Lamson St, Grand Ledge
Grand Ledge High School	820 Spring St, Grand Ledge
Beagle Middle School	600 South St, Grand Ledge
Hayes Middle School	12620 Nixon Rd, Grand Ledge
Delta Center Elementary	305 S Canal Rd, Lansing
Holbrook Elementary	615 Jones St, Grand Ledge
Neff Elementary	950 Jenne St, Grand Ledge
Wacousta Elementary*	9135 Herbison Rd, Eagle
Willow Ridge Elementary	12840 Nixon Rd, Grand Ledge
Operations Facility	12730 Nixon Rd, Grand Ledge

* =Not in Urbanized Area, but voluntarily included in program

GLPS submitted a Storm Water Discharge Permit Application Notice of Intent (NOI), on March 10, 2003. The NOI included site plans/diagrams showing known discharge points, or outfalls, from each referenced GLPS complex.

The DEQ issued GLPS a Certificate of Coverage under the General Permit Number MIS040000. The Certificate of Coverage Number is MIS040002 and designated facility name is "Grand Ledge PS MS4-Eaton."

1.3 LEGAL AUTHORITY

GLPS has total control over the access and use of its own facilities, which will be sufficient to control storm water discharges within the MS4 as required by the Permit. For instance, GLPS controls its own MS4 connections, implements construction controls on its on-site construction projects and roadways, conducts inspections, implements post-construction controls on its MS4, and implements pollution prevention/good housekeeping practices. GLPS will not discharge non-stormwater discharges into its MS4.

GLPS does not have authority to enact ordinances or authority over public infrastructure traversing its property. However, should GLPS identify improper discharges to its MS4 from an external source, GLPS will follow the Enforcement Response Procedure in Section 1.4 to ensure compliance with the Permit.

1.4 ENFORCEMENT RESPONSE PROCEDURE

This SWMP has been adopted as an official policy of GLPS, and is the primary regulatory mechanism to ensure compliance with the Permit and all applicable stormwater regulations. Mr. Craig Harley will be responsible for recordkeeping. GLPS will track instances of non-compliance with this SWMP using the form in Appendix G, Section 1, which tracks the name of the person responsible, the date of discovery, the nature of the violation, the enforcement response used, a schedule for returning to compliance, and the date resolved. The schedule for returning to compliance may vary with the complexity of the violation, but will fall within the response schedules set out in other sections of this document.

GLPS has total control over the access and use of its own facilities, and will ensure elimination of improper discharges. Should GLPS identify improper discharges to its MS4 from a known external source, GLPS will inform the discharger within 24 hours about its findings and the need to eliminate or correct the discharge. If the discharger fails to correct the problem, local authorities will be contacted for assistance within five business days.

If GLPS suspects that the discharge is endangering health or the environment, GLPS will notify the DEQ within 24 hours. Notice may be provided after regular working hours via the Pollution Emergency Alerting System (PEAS) at (800) 292-4706.

1.5 COORDINATION WITH LOCAL GOVERNMENT

The district coordinates implementation of this SWMP with the respective local body of government within which the facilities are located, to the extent feasible. This coordination entails identification of the watershed within which each complex is located, and notification of the implementation of this SWMP. See Section 6.0 for a listing of the government entities and watershed groups with which GLPS is coordinating. GLPS has obtained and reviewed the watershed management plans developed by local stakeholders for the district's receiving streams.

1.6 RECEIVING WATERS IDENTIFICATION

The receiving waters from each complex known as of the submittal of the NOI are as follows:

GLPS Facility	Receiving Waters
Central Administration (Sawdon)	City of Grand Ledge Storm Sewer
Grand Ledge High School	City of Grand Ledge Storm Sewer; Sandstone Creek
Beagle Middle School	Sandstone Creek
Hayes Middle School	Wetland Area
Delta Center Elementary	Delta Township Storm Sewer
Holbrook Elementary	City of Grand Ledge Storm Sewer
Neff Elementary	Sandstone Creek via High School
Wacousta Elementary*	No conveyances; not included in NOI
Willow Ridge Elementary	Miller Creek via Operations Facility
Operations Facility	Miller Creek

* =Not in Urbanized Area, but voluntarily included in program

1.7 GOALS AND OBJECTIVES

The objective of development of a Storm Water Management Program by small MS4 owners/operators is to reduce pollutants in storm water to the maximum extent practicable (MEP) to protect water quality. Implementation of a program that incorporates elements of the six minimum measures will help GLPS achieve this goal.

MEP is a standard that establishes the level of pollutant reductions MS4 operators can achieve through implementation of a storm water management program. The strategies may be different for each MS4 and each facility because of unique local hydrologic, geologic, and water quality concerns in each location. Therefore, MEP has been considered in development of the general program, however, specific requirements may vary for implementation on a case-by-case basis for each GLPS facility, as appropriate.

2.0 SITE DESCRIPTION

The GLPS district (the “Site”) covers an area of 125 square miles. Included within the school district are the City of Grand Ledge and the villages of Delta Mills, Mulliken, Wacousta, and Eagle, as well as a large portion of Delta Township. The school district, which is mainly in Eaton County, includes portions of Clinton and Ionia Counties. See Attachment A for the District Map and Attachment B for individual facility site maps.

3.0 ILLICIT DISCHARGE ELIMINATION PROGRAM

3.1 INTRODUCTION

An Illicit Discharge Elimination Program (IDEP) is a program designed to identify, prioritize, and minimize or eliminate illicit connections to the storm water system, and to prohibit future illicit connections.

3.2 DEFINITIONS

The following are key IDEP terms:

- Illicit discharge: Any discharge (or seepage) to the separate storm water drainage system that is not composed entirely of storm water, uncontaminated groundwater, or one of a few other specifically defined exceptions.
- Illicit connection: A physical connection to the separate storm water drainage system that primarily conveys illicit discharges into the system and/or is not authorized or permitted by the local authority.
- Point source discharge (PSD): An outfall from a drainage system to waters of the state, or a point where a storm water drainage system discharges into a system operated by another public body.
- Significant illicit discharge: A discharge that shows evidence of impairing water quality in the receiving stream.

3.3 PERMIT REQUIREMENTS

There are five permit requirements for developing an IDEP. They include:

- A listing or map of known storm water point sources to be included in the Notice of Intent (NOI) for coverage under the General Permit.
- A schedule for providing an updated map of the location of each known storm water point source discharge. The drawing must include a description of the conveyances leading to these point source discharges and the respective receiving waters or drainage systems,
- A program to find, prioritize, and eliminate illicit connections, and minimize illicit discharges to the MS4 or waters of the state,
- A description of a program to minimize infiltration of seepage from sanitary sewers and septic systems into the MS4, and
- Legal authority to prohibit discharges into the drainage system.

3.4 ILLICIT CONNECTION IDENTIFICATION

3.4.1 Notice of Intent

GLPS submitted a Storm Water Discharge Permit Application, or Notice of Intent (NOI) on March 10, 2003. The NOI included site plans/diagrams showing known discharge points, or outfalls, from each referenced GLPS complex.

3.4.2 Storm Water System Mapping

GLPS contracted with Testing Engineers & Consultants, Inc. (TEC) to assist in the development and implementation of the IDEP. TEC has visited each facility to review existing drawings, interview maintenance staff, and conduct a walkover of the storm water system.

Outfall Identification

TEC field verified the outfalls identified in the NOI during the site visit. If additional outfalls are discovered during on-going site visits, they will be identified and included in the SWMP. Outfall identification includes connections to other MS4s. Additionally, each outfall is field-located using a positioning system (GPS) unit for inclusion on system maps prepared for each facility.

Where outfalls consist of connections to other MS4s, the down-gradient storm sewer operators will be contacted to verify the connections. Identification of riparian lands that may be located on or traverse district property will also be made where appropriate.

Conveyances Description

Using existing drawings, interviews with GLPS maintenance staff, and field verification techniques, the storm water conveyance system at each facility has been compiled onto the site diagrams. Riparian lands will also be noted, if present.

3.4.3 Outfall Condition - Visual Screening

A visual screening is conducted to note and record outfall conditions, if accessible (e.g., those discharges which do not discharge to a down-gradient MS4).

3.4.4 Receiving Waters Condition - Visual Screening

A visual screening is conducted to note and record receiving water conditions, if the outfall discharges directly to a water body.

3.4.5 Training

TEC conducts awareness training regarding operations and potential illicit connections/discharges on an annual basis for GLPS district maintenance staff. GLPS will require that each member of the district maintenance staff attend this training at least once during the three-year permit cycle, and that new employees attend within their first year of hire. An outline of training topics, developed by TEC, is presented in Appendix E. Additional training on recognition of potential illicit connections, discharges, and outfall indicator parameters is available to maintenance staff as part of the PEP, on an as-needed basis. Grounds-keeping staff is interviewed periodically to determine if they have identified potential stormwater concerns.

3.4.6 Dry Weather Screening

A dry weather visual screening of each identified outfall is conducted to assist in the identification of potential illicit connections. The visual screening is documented using a field form, attached as Appendix G, Section 2. The screening is conducted at all PSDs, including enclosed discharge points (i.e., connections to down-gradient MS4s) and outfalls to waters of the state. Screening is conducted at least 72 hours after a significant precipitation event.

Dry weather screening is conducted annually to assess progress in elimination or minimization of illicit connections/discharges. The annual screening also includes visual observations of the condition of each outfall and receiving waters at each location.

3.4.7 Additional Assessment/Confirmation of Illicit Discharges

Based on the field observations from site visits, document review, interviews, outfall visual observations, and dry weather screening, gaps in conveyance mapping and potential illicit discharges/connections may be identified, which will require additional assessment/confirmation.

Additional assessment may involve tracer dye or smoke testing of storm water conveyances, or sampling of discharges and laboratory analysis of indicator parameters. All available visual methods, including flow monitoring (e.g., introduction of high water volume in specific conveyances in conjunction with visual observation of changes in flow), are used prior to testing or sampling. If warranted, sampling will be conducted within 24 hours of identifying flow.

For potential illicit discharges that may result from a cross-connection with a sanitary wastewater source, confirmatory biological sampling and laboratory analysis for *E. coli* will be conducted.

For potential illicit discharges that may result from a cross-connection with a process water, or non-rain water source not specifically exempted by the Permit, chemical sampling and analysis will be conducted. Appropriate indicator parameters are selected on a case-by-case basis, depending on the nature of the suspected source, in order to confirm the illicit connection. If a probable source has not been identified, the analysis will be for herbicides, pesticides, volatile organic compounds (VOCs), and polynuclear aromatic hydrocarbons (PNAs) to assist in determining the source of the illicit discharge. These parameters will screen for a variety of chemicals used in the maintenance of GLPS facilities.

Confirmation sampling as described above may also be conducted to investigate illicit discharges resulting from illegal dumping or spills, if the nature and/or source of the contaminants is not apparent.

If sources of storm water flow not attributable to rain water or permitted non-storm sources cannot be identified, tracer dye testing may be required. Tracer dye testing can only be conducted by permission of the DEQ. If tracer dye testing is warranted, a letter is submitted to DEQ outlining the dye product to be used, the estimated concentration in receiving waters, and a date range within which testing is conducted. Tracer dye testing will not commence until DEQ authorization is received.

In the event a potential illicit discharge cannot be confirmed by a combination of the means described above, consideration is given to using a televised video assessment.

The timeline for investigation and corrective action procedures is highly dependent upon the nature and location of the illicit discharge. However, GLPS will begin its source investigation within five business days of discovery.

3.4.8 Prioritization of Potential Illicit Connections

Once illicit connections, if any, are identified, a schedule is developed to eliminate or minimize the connections. The illicit connections identified is prioritized for elimination or minimization based on the level of impact to the surface water quality and the level of effort/fiscal feasibility to implement. Fiscal feasibility is determined by available funds and timing for budgeting implementation in the

appropriate school year. Priority is given to illicit connections/discharges that have the greatest potential to harm down-gradient aquatic habitats.

3.5 ILLICIT CONNECTION/DISCHARGE ELIMINATION/MINIMIZATION

3.5.1 Implementation Plan

Illicit connections/discharges that require major capital expenditures to eliminate or minimize the connection/discharge are prioritized based on available funds and budgeted for implementation in subsequent school years. Since continuing discharges are non-permitted and subject to fines up to $25,000 per day per violation, they are prioritized for rapid elimination. If the removal of a connection or discharge is delayed because of weather, capital needs, or other critical factors, GLPS will evaluate ways to collect and dispose of the source material so that the discharge is eliminated quickly. An implementation plan is developed to track the progress of elimination/minimization of confirmed illicit connections/discharges. The plan will allow for progress reporting as well as monitoring of measurable goals (see below).

In the event an illicit cross-connection to a sanitary line is identified, GLPS is prepared to comply with the Sanitary Sewer Overflow (SSO) notification and annual reporting requirements for discharge of sewage from illicit sanitary cross-connections. Such an illicit connection is given highest priority for elimination.

Should an illicit discharge occur due to illegal dumping or spills, GLPS will attempt to correct the problem and/or identify the responsible party within 24 hours of discovery or the receipt of a complaint. Notifications will be made as described in Section 1.4. If the source is not readily apparent, source investigation activities will commence within five business days. These may include sampling and analysis, as discussed in Section 3.4.7, or surveillance methods as appropriate based on the location and nature of the discharge. If the source is under the control of GLPS, the incident will be logged in Appendix G, Section 1 and corrective actions will include implementation of BMPs to reduce the risk of similar releases in the future. If the source is a third party, GLPS will follow the Enforcement Response Procedure described in Section 1.4.

3.5.2 Evaluation and Assessment

The following outlines the implementation of the IDEP based on major tasks.

<u>System Mapping of Outfalls and Conveyances</u>
System mapping has been completed. Conveyances description has been completed. Verification of connections to down-gradient MS4 operators has been completed. System mapping for each facility has been completed.

<u>Initial Screening of Outfalls/Receiving Waters</u>
Initial visual screening of each outfall and receiving waters has been completed.

<u>Interviews/Questionnaires/Training</u>
Interviews with facility maintenance staff, distribution of the questionnaires, and initial awareness training have been completed.

Dry Weather Screening
Annual dry weather screening is conducted in the fall of each year of the permit duration. The goal of the annual dry weather screening is to evaluate the progress in elimination or minimization of illicit connections/discharges (see below).

Additional Assessment/Confirmation/Prioritization
Additional assessment of potential illicit discharges/connections has been completed. The facilities are grouped based on the gravity of the potential illicit discharge/connection determined during the initial visual assessment and dry weather screening tasks. Video confirmation, if needed, would be scheduled for the following school year on a case-by-case basis.

3.5.3 Measurable Goals

The following measurable goals are used to assess the progress of IDEP implementation:

- Number of illicit discharges/connections eliminated versus number found
- Ability to meet the IDEP proposed schedule
- Procedure to monitor new construction to prevent cross connections

3.5.4 Fieldwork Manual/Checklists

GLPS has developed a field checklist for conducting visual assessments. The checklist includes guidelines for conducting the observations.

4.0 PUBLIC EDUCATION PROGRAM

4.1 INTRODUCTION

The purpose of the Public Education Program (PEP) is to promote, publicize, and facilitate education for the purpose of encouraging the public, as defined by GLPS, to reduce the discharge of pollutants in storm water to the maximum extent practicable (MEP).

4.2 PERMIT REQUIREMENTS

The PEP permit requirements include educating the public in the following categories, as appropriate to each facility, the staff mix, and the audience:

- Hazards associated with illicit discharges and improper waste disposal, including prevention of grease and litter discharges to the storm water system by food service staff;
- Potentially impacted water body at each location and stewardship of the watershed;
- Good housekeeping practices including lawn care, pesticide and herbicide application, vehicle and equipment cleaning (power washing), de-icing;
- Availability and location of facilities for the collection and disposal of household hazardous wastes;
- Other maintenance activities as may apply to each facility, such as proper septic system care, management of riparian lands, and the role of vegetation in watershed maintenance.

4.3 DEFINITION OF PUBLIC

For purposes of this SWMP, GLPS has defined public as the Board of Education (Board), school district employees, district students, parents/guardians of district students, outside contractors providing services to GLPS, and visitors to GLPS properties. The PEP will prioritize stormwater topics that are relevant to the public use of GLPS facilities.

4.4 AWARENESS PROGRAM

A training program, using in part the DEQ-sponsored "Be Stormwater Savvy" promotional and training materials has been developed. GLPS management personnel are responsible to disseminate appropriate information to employees whose job functions are directly related to activities that have the potential to affect storm water, including maintenance, grounds, and janitorial staff.

An awareness program has been developed and is provided to contractors to notify them of their responsibilities to adhere to the Storm Water Management Program requirements. Contractors are monitored by GLPS' Construction Manager (CM).

In addition, promotional materials have been developed to disseminate to the district students and their parents/guardians on a periodic basis, generally annually. This is accomplished through existing notification venues. GLPS publishes a newsletter entitled Grand Ledge Public Schools Insider. In addition, the district maintains a web site at www.glps.kl2.mi.us that is used to post pertinent information for the students and their parents/guardians.

Notification will include information on the availability and location of facilities in the area for the collection and disposal of household hazardous wastes and the local governmental unit reporting procedures for discovery of illicit discharges.

GLPS will provide resources to incorporate storm water awareness into the district's curriculum and share with administration representatives responsible for district curriculum so they can make informed decisions on including such information. The content of the various training/awareness materials is geared specifically to each audience, but covers the major categories outlined in Section 3.2.

4.5 IMPLEMENTATION

Awareness training of maintenance/janitorial and administrative staff (including the Board) is conducted at least annually. Contractor awareness information is developed and disseminated to new contractors. The GLPS' CM is contractually obligated to provide this information to all contractors on an on-going basis.

Notifications to students, parents/guardians and visitors to GLPS facilities are made periodically in the Grand Ledge Public Schools Insider newsletter and on the GLPS web site located at www.glps.k12.mi.us. Periodic information is included in the newsletter or mailed. Coordination with the regional watershed permit group's PEP has commenced.

4.6 EVALUATION/MEASURABLE GOALS

The following measurable goals are used to assess the progress of PEP implementation:

- GLPS will conduct an annual survey (via the GLPS website) to assess the public awareness of GLPS' PEP efforts
- Track attendance at training for maintenance/janitorial/grounds staff
- Disseminate awareness materials to the public annually in newsletter or on web site
- Website hit counter for GLPS' SWMP website
- Monitor email responses received via the GLPS' SWMP website

These activities, along with the public participation goals discussed in Section 6.0, will be tracked using the form in Appendix G, Section 4. Program-specific feedback will be shared with the individuals and groups that conduct PEP activities in order to facilitate continual improvement of those programs. Metrics described above will be evaluated and discussed within the annual progress report. If the PEP is found to be ineffective based on the metrics (for instance, if surveys indicate decreasing awareness or knowledge of watershed issues), revisions will be made to address the specific deficiencies indicated by the evaluation.

5.0 POLLUTION PREVENTION/GOOD HOUSEKEEPING PROGRAM

5.1 INTRODUCTION

GLPS facility operations cover a wide variety of activities and land uses that are potential sources of storm water pollutants. These include roadway and parking lot maintenance, transportation and equipment garages, open ditches and storm sewers, turf and landscaping activities, and waste handling and disposal activities. The purpose of a comprehensive pollution prevention and good housekeeping program is to document and evaluate current practices, identify opportunities for improvement, and help effect reduction of pollutants entering the storm water system from improper disposal of wastes, spills, and operations and maintenance activities.

5.2 PERMIT REQUIREMENTS

The permit requires development, implementation, and compliance with a program of operation and maintenance BMPs with the ultimate goal of preventing or reducing pollutant runoff from operations to the maximum extent practicable. This includes ensuring staff:

- Properly handle wastes, recyclables, chemicals, and equipment used on the job;
- Maintain a clean work area;
- Regularly maintain storm water controls; and,
- Identify and report various storm water pollution sources, including illicit discharges, malfunctioning post-construction controls, and poor soil erosion and sedimentation controls at construction sites.

This requirement must be accomplished by providing staff with:

- Guidance or operation manuals;
- Employee training and testing; and
- Equipment and other resources necessary to prevent and reduce storm water pollution.

The permit requires the development and implementation of BMPs covering structural and administrative storm water controls, roadway construction and maintenance activities, fleet maintenance activities, and, turf management (pesticides and fertilizers).

GLPS has assessed its facilities, as identified in Section 1.2, for the potential to discharge pollutants to surface waters. Facilities are prioritized based on typical site activities (i.e., vehicle maintenance) and the quantity of hazardous materials and petroleum products stored on site. In general, administrative and school buildings are considered to have a low potential to discharge pollutants. Facility and fleet maintenance activities have a moderate potential to discharge pollutants. Therefore, the Operations Building and Bus Garage are presently designated as prioritized facilities. Prioritization of facilities will be re-assessed at the beginning of each permit cycle and upon construction or renovation (change of use) of GLPS buildings.

5.3 OPERATION AND MAINTENANCE

An on-going assessment is made to document current Operation and Maintenance (O&M) activities, procedures, or policies, as appropriate. Once the assessment is complete, the activities, procedures, or policies are reviewed to determine whether modifications are required in practices to help improve the quality of storm water discharge and to guide the implementation of training outlined in the PEP.

The following are examples of existing O&M activities in place at GLPS and potential BMP modifications to those practices:

5.3.1 Lawn Chemical Management

Lawn care is managed and conducted by GLPS. Generally, turf management chemicals are only applied to athletic fields. A questionnaire is used to obtain current information on fertilizer, pesticide, and herbicide application from maintenance staff at each location. The questionnaires are compiled and an assessment made as to whether modifications to turf management practices can be made to improve the quality of storm water discharge. GLPS will follow manufacturer recommendations for application of lawn chemicals, including ensuring the materials are not applied when rain is forecast. A copy of the questionnaire is included in Appendix G, Section 7.

GLPS has retained an outside contractor to develop a Turf Management Plan. Baseline soil testing is conducted to assess the current soil loading of fertilizer constituents in areas where fertilizer is applied. The testing results are used to adjust future fertilizer application. In addition, if required, aspects of turf management are added to the annual grounds and maintenance staff training program.

5.3.2 Pest Management

GLPS has an Integrated Pest Management Plan (IPM), as required by the Michigan Department of Public Health. Pesticide management is contracted to an outside contractor, who is certified by the State of Michigan in the 3A (Turfgrass) and 3B (Ornamental and Shade Plants) categories. The IPM is reviewed with respect to potential impacts on storm water quality. The IPM states the contractor will not apply materials when rain is forecast or when wind speeds that would cause significant drift are expected.

5.3.3 Catch Basin Management

Currently, silt build-up in catch basins is cleaned out three times per year. GLPS uses outside contractors, or the City of Grand Ledge, equipped with vacuum ("vac") trucks. Materials extracted from catch basins will be properly disposed off-site. GLPS will request and retain disposal manifests or load ticket from the contractors.

The catch basin at the Operations Center is equipped with an oil/water separator and the water is discharged to the sanitary sewer system. The oil/water separator is emptied three times per year by a licensed waste hauler and the material is properly disposed off-site.

Contractors will be required to follow best management practices for dewatering and disposal of materials extracted from catch basins, as described in the DEQ compliance assistance document, *Catch Basin Cleaning Activities Guidance Document.* Forms to certify the contractor's familiarity and intent to comply with the document are located in Appendix G, Section 6.

GLPS procedures are assessed and a determination made as to whether a preventive maintenance program should be implemented. In addition, an evaluation into retrofitting catch basins with inserts is made (see Post-Construction Storm Water Runoff Control for further discussion and schedule for implementation).

GLPS incorporates routine (at least annual) inspections of the catch basins at each facility as part of a preventive maintenance program. The process follows the guidelines in the US EPA "Stormwater O&M Fact Sheet: Catch Basin Cleaning." Generally, catch basins will require cleaning once 50% of capacity is reached.

5.3.4 Road/Parking Lot Maintenance

GLPS uses outside contractors for maintenance on its roads and parking lots. Major reconstruction is also contracted out. Street sweeping is currently conducted annually. Activities associated with maintenance as well as street cleaning activities on GLPS managed roads and parking lots are assessed to determine whether the existing frequency of street cleaning is adequate or whether an increased frequency is required.

Contractors will be required to follow best management practices for dewatering and disposal of street sweeper waste material, as described in the DEQ compliance assistance document, *Catch Basin Cleaning Activities Guidance Document.* Forms to certify the contractor's familiarity and intent to comply with the document are located in Appendix G, Section 6.

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5.3.5 Salt and Sand/De-Icing

GLPS does not store salt or sand on-site, except for some palletized bags stored indoors for hand application to sidewalks. Salt for road and parking lot de-icing is obtained from the City of Grand Ledge on a per load basis. GLPS does not store salt outdoors. Salt is applied by GLPS grounds staff using a hand-spreader or a truck-mounted calibrated spreader.

5.3.6 Fleet Maintenance

GLPS operates a fleet of buses and service vehicles. Buses will be periodically inspected for leaks in conjunction with scheduled quarterly preventative maintenance. Parking areas will also be monitored for significant oil staining and/or sheen on a quarterly basis.

An assessment of maintenance activities has been made to determine practices and whether improvements can be made to reduce potential impact on storm water discharge. Areas evaluated included hazardous materials storage, used oil management, and spill prevention. In addition, the district operates a vehicle wash unit which discharges via an oil-water separator to the sanitary sewer system. This operation was included in the assessment and an evaluation made of potential impact to the storm system. All fleet maintenance chemicals are handled and stored indoors, where there is no contact with rainwater. While there remains some potential for discharge during vehicle refueling operations, a refueling procedure is in development. Therefore, fleet maintenance areas are not considered "high potential" to discharge pollutants to surface waters of the state.

At the Operations Center, blow-down wastewater from a compressor has been re-routed from a down spout drain to the on-site sanitary system to prevent contact with stormwater. The blow down wastewater now passes through an oil-water separator that discharges to an on-site holding tank; the tank is periodically pumped out. GLPS is in the process of installing an air dryer system to the air compressor to reduce the initial amount of moisture going into the air tank. Additional information is provided in Attachment E.

5.3.7 Trash Dumpster Management

An evaluation of solid waste management practices, specifically dumpster handling, including containment or proximity to catch basins, is made. However, none of the dumpsters in use at GLPS are equipped with hydraulic compactors. Based on the assessment, modifications may be made to dumpster location/management. The evaluation will also assess the potential for impact to the storm water system from other sources of trash.

In addition, the district's cafeteria drains are equipped with grease traps, which are cleaned out periodically by an outside contractor and the grease removed off-site for disposal. GLPS does use two grease collection containers, at the high school and at Hayes Middle School, which are periodically emptied by a contractor. Grease is therefore managed in a manner that does not impact storm water discharge.

Training has been provided to staff to specifically address the need to keep dumpster lids closed, and keep areas around dumpsters clean. Annual stormwater management refresher training is provided.

5.3.8 Swimming Pool Maintenance

GLPS operates a swimming pool at the high school that discharges to the City of Grand Ledge sanitary sewer system. Filter backwash is also discharged to the sanitary system.

5.3.9 Septic System Management

GLPS operates a septic system at Wacousta Elementary School. Although this location is not located within the Urbanized Area, an evaluation has been made of the management of the system to assess potential for impact to the storm water system. The system is evaluated annually for proper operation. The ground is viewed approximately weekly during routine ground-keeping. The septic tanks are pumped annually and have never been observed to be close to using up the available capacity. The system is inspected and serviced annually.

5.3.10 Floor Maintenance

Floor scrubber/stripper and carpet cleaning wash water is collected and discharged to the sanitary sewer via janitorial slop sinks.

5.3.11 Sports Field Line Painting Equipment Cleaning

The district maintains sports fields and sports field line painting equipment cleaning is conducted. The paint is mixed and the equipment is cleaned at the Operations Center. The water used in cleaning is discharged to the sanitary sewer.

5.4 ADDITIONAL BMPS

In addition to implementing improvements to the existing management practices outlined above, consideration is given to the following BMPs for implementation at GLPS:

- Overall district hazardous materials management and spill prevention, including material storage coverings
- Flow diversion installation
- Use of native plants to replace turf grass in selected areas
- Labeling of storm sewer structures installed after March 10, 2004
- Assessing impacts to water quality of new flood management projects (see Post-Construction Run-Off Section)

5.5 STAFF AND CONTRACTOR TRAINING PROGRAMS

In order to effectively implement improvements to existing operations or implement additional BMPs, specific BMP information is incorporated into the PEP staff training and awareness information dissemination. An outline of training topics for the maintenance/janitorial/grounds staff is included in Appendix E.

5.6 RELEASE REPORTING

If a release of any polluting material from the MS4 to the surface waters or groundwaters of the state occurs, the DEQ will be notified as soon as practicable but no later than one business day of discovery, unless the release is known to be less than the applicable threshold reporting quantity. During business hours, staff will contact the DEQ's Lansing District Office directly at (517) 335-6010. After hours, the DEQ 24-Hour Pollution Emergency Alerting System (PEAS) at (800) 292-4706 will be used.

5.7 IMPLEMENTATION

GLPS programs are fully implemented. GLPS will continue to annually evaluate their BMPs to assess areas of possible improvement.

5.8 EVALUATION/MEASURABLE GOALS

The following measurable goals are used to assess the progress of Pollution Prevention/Good Housekeeping Program implementation:

- Track fertilizer applications (frequency, volume, and area) and note changes in fertilizer usage, if soil testing warrants
- Track salt/de-icing material applications (frequency and quantity)
- Track frequency and results of fleet inspections (quarterly)
- Track frequency of catch basin cleaning activities (three times annually)
- Track frequency of street sweeping activities (annually)
- Track contractor oversight, as discussed below

Facilities maintenance activities described above and conducted by GLPS staff will be logged in Appendix G, Section 5.

In addition, tracking of the following BMPs has been discussed previously:

- Track completion of dry weather screening program of GLPS PSDs (see IDEP for discussion; tracking form is located in Appendix G, Section 2)
- Track attendance at employee training sessions (see PEP for discussion; tracking form is located in Appendix G, Section 4)

Contractors will be required to comply with the pollution prevention and good housekeeping program, particularly the BMPs described in Section 5.3. In addition, the BMPs will be integrated into the preparation of specifications and bid documents. Forms to certify the contractor's familiarity and intent to comply with the BMPs are located in Appendix G, Section 6.

6.0 PUBLIC INVOLVEMENT/PARTICIPATION

6.1 INTRODUCTION

GLPS has posted its SWMP and a map of the district on its stormwater website. Comments on the SWMP or reports of possible stormwater issues/violations may be emailed to the district using an email address available on that website.

6.2 PERMIT REQUIREMENTS

The permit encourages public input in the storm water management program. GLPS has posted the SWMP on its webpage and welcomes comments or questions from the public.

Cooperation with local stream or watershed protection organizations is encouraged. This involvement can include:

- Informing the organizations of activities under the storm water management program
- Seeking ways to meet general permit requirements by interacting with the local organizations involved in water resource protection

6.3 LOCAL GOVERNMENT/WATERSHED GROUP IDENTIFICATION

GLPS discharges storm water into several local government systems and watersheds. The local governments and regional watershed permit groups (including the Looking Glass River Watershed and the Grand River Watershed) have been identified. GLPS intends to correspond with these governmental units and regional watershed permit groups.

6.4 NOTIFICATION TO PUBLIC

As outlined in the PEP, notification to students, parents/guardians and visitors to GLPS facilities of the requirement for the district to develop a storm water management program is made via its website and information on the implementation is made periodically thereafter in the Grand Ledge Public Schools Insider newsletter and, as necessary, on the GLPS website located at www.glps.kl2.mi.us. Stormwater informational posters have been displayed in public locations within school facilities.

6.5 COOPERATIVE ARRANGEMENT WITH WATERSHED GROUP

GLPS cooperates with the watershed groups for facilitating the watershed group's PEP (e.g., GLPS will consider providing facilities for outreach meetings to the greater public by the watershed group).

GLPS has participated in PEP activities with the Greater Lansing Regional Committee (GLRC - http://www.mywatersheds.org/), the watershed permit group associated with watersheds to which district storm water discharges (see Public Involvement/Participation Section). The purpose of this activity is to get help disseminating information to students, parents/guardians, and visitors to GLPS facilities. In addition, GLPS representatives will periodically attend the regional watershed permit group meetings to foster cooperation between the District and the group.

6.6 ADVISORY COMMITTEE

To achieve the requirement for public participation, GLPS will set up an internal committee made up of Facility and Grounds staff with Board of Education review. The purpose of the committee is to provide input into the implementation of the District's Storm Water Management Program.

6.7 IMPLEMENTATION/MEASURABLE GOALS

The following measurable goals are used to assess the progress of BMP implementation:

- Identification is completed
- Notification has been made via the website
- Attend at least one regional watershed permit group meeting per year
- Monitor activities of regional watershed permit group via other means (web site/newspaper)
- Discuss storm water issues at periodic meetings of the Michigan School Business Officials association
- Conduct three internal advisory committee meetings per school year

These activities, along with the public education goals discussed in Section 4.0, will be tracked using the form in Appendix G, Section 4.

7.0 CONSTRUCTION STORM WATER RUNOFF CONTROL

7.1 INTRODUCTION

Polluted storm water from construction sites often flows to MS4s and ultimately is discharged into the receiving waters or drainage systems operated by others. Pollutants commonly discharged from construction sites can include:

- Sediment;
- Solid and sanitary wastes;
- Phosphorous (fertilizer);
- Nitrogen (fertilizer);
- Pesticides;
- Oil and grease;
- Concrete truck washout;
- Construction chemicals; and
- Construction debris.

Of these, sediment is the main pollutant of concern. Sediment runoff rates from construction sites are generally 10 to 20 times greater than from agricultural lands, and 1,000 times greater than from forest lands. During a short time, therefore, construction sites can contribute more sediment to waters of the state than are deposited naturally over several decades.

7.2 PERMIT REQUIREMENTS

The Phase II Final Rule and the permit require control of storm water discharges from construction activity that results in land disturbance of greater than or equal to one acre, or disturb less than one acre but is part of a larger common plan of development or sale that would disturb one acre or more. In addition, Michigan's Soil Erosion and Sedimentation Control statute (Part 91 of Act 451 of 1994) prohibits offsite sedimentation for sites less than one acre if located within 500 feet of a wetland, lake or stream.

Construction projects meeting these requirements, therefore, are subject to soil erosion and sedimentation control (SESC) requirements outlined in the State of Michigan's Part 91 rules, including design and implementation of runoff control measures. The construction site developer or GLPS is responsible for obtaining a Part 91 SESC Permit before commencing construction activity one acre or greater in total earth disturbance, and must 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. Each construction site must be regularly inspected by a certified storm water operator (CSWO) during construction as required under the State of Michigan's Permit by Rule (Rule 323.2190) to make sure control measures are enforced.

In the event of violations, including the discharge of soil, sediment, or other pollutants to the MS4 during construction activity, the CM shall notify the Eaton County Drain Commissioner’s office within two business days, and the DEQ within five business days. If the problem cannot be corrected within these time frames, the CM shall submit a timeline for returning to compliance. In addition, the CM will implement measures to reduce the likelihood of recurrence.

7.3 EXISTING PROGRAM

The district contracts out all construction projects involving earthwork. GLPS' CM is contractually-obligated to maintain compliance with applicable legal requirements and the GLPS SWMP. Currently, SESC permitting and Certified Storm Water Operator (CSWO) monitoring is the responsibility of the architectural/engineering firm responsible for civil engineering design, the general contractor/construction manager managing the construction project, or the earthwork subcontractor. The general contractor will note the location of structural stormwater controls in the as-built plans for new facilities, which will be provided to GLPS upon completion of the project. An inventory of existing structural stormwater controls is provided in Attachment F, which will be revised to include new facilities within thirty days of their completion.

7.4 ADDITIONAL BMPS

GLPS contractually requires architects/engineers and/or construction managers to be responsible for compliance with Michigan's Part 91 SESC requirements and Permit-by-Rule for construction storm water runoff control for construction disturbing more than one acre. The district will also contractually require architects/ engineers and/or construction managers be responsible for compliance with other environmental regulations and BMPs for construction (e.g., construction debris, concrete truck washout, and hazardous materials management), if not already included in the contract.

As part of the State of Michigan site plan review process, if required, the district's submittal to the State of Michigan will ensure erosion controls have been addressed and a soil erosion and sedimentation control plan has been prepared.

7.5 IMPLEMENTATION/MEASURABLE GOALS

The following measurable goals are used to assess the progress of BMP implementation:

- GLPS' CM tracks and enforces compliance of contractors to permit-by-rule requirements for construction sites over one acre and other BMPs outlined above when construction projects involving earthwork are conducted while the current permit is in effect.

8.0 POST CONSTRUCTION STORM WATER RUNOFF CONTROL

8.1 INTRODUCTION

Post-construction storm water management in areas undergoing new development or reconstruction is necessary because runoff from these areas has been shown to significantly affect receiving waters. There are generally two types of impacts from post-construction runoff. The first is caused by an increase in the type and quantity of pollutants. As runoff flows over areas altered by development, harmful sediment and substances, such as oil and grease, pesticides, heavy metals, and nutrients (e.g., nitrogen and phosphorous), can become suspended and carried to receiving waters.

The second type occurs by increasing the volume of water delivered to receiving waters during storms. Increased impervious surfaces interrupt the natural cycle of gradual percolation of water through vegetation and soil. Instead, large volumes of water are collected from surfaces such as roofs, and asphalt or concrete roads/parking lots, and are routed to the drainage system, and quickly flow to the

nearest receiving water. This may result in stream bank scouring and downstream flooding, impacting aquatic life and property.

8.2 PERMIT REQUIREMENTS

The permit requires development and implementation of a comprehensive storm water program for new development and redevelopment projects that outlines development, implementation, and enforcement of controls across the entire urbanized area at each facility to protect the designated uses in all receiving waters from the effects of urbanization.

The common effects of urbanization to be considered by the program include:

- Stream "flashiness" (higher peak flow and lower base flow);
- Stream bank erosion;
- Increased stream temperature and pollutant load;
- Reduced stream bank vegetation; and,
- Degraded fish and aquatic habitat.

The district is not subject to local site plan review, and does not have control over review of site plans for off-site development. However, it does have the authority to develop its own site plans for development or redevelopment at the referenced affected complexes subject to this SWMP.

8.3 EXISTING SYSTEMS

8.3.1 Structural Controls

GLPS maintains documentation of existing structural controls in place at GLPS facilities and verify the controls are maintained to ensure effectiveness.

8.3.2 Non-Structural Controls

As part of the Pollution Prevention/Good Housekeeping evaluation, existing non-structural controls are evaluated and documented.

8.4 COORDINATION WITH LOCAL OR REGIONAL SWMPS

GLPS has provided links on its website to local or regional watershed master SWMPs. GLPS will take into consideration the local or regional storm water master SWMP when evaluating new BMPs for post-construction flow controls during new development or renovation planning.

8.5 POST CONSTRUCTION FLOW CONTROLS

As part of the site planning process for construction or re-development projects disturbing greater than or equal to one acre, GLPS will evaluate the feasibility of implementation of BMPs designed to manage storm water run-off from the affected complexes subject to this SWMP. Appropriate BMPs will be selected and implemented in order to meet a performance standard in which the post-construction runoff rate and volume of discharges shall not exceed the pre-development rate and volume for all storms up to the two-year, 24-hour storm at the site. In addition, although the district is not subject to local site plan review, GLPS will coordinate the implementation of BMPs with any local or regional entities into whose storm water system the project's storm water is discharged. Some of the BMPs GLPS will consider include, but are not limited to, the following:

8.5.1 Structural BMPs

- Dry extended detention ponds
- Infiltration basins/trenches
- Porous pavement (when shown to be effective in cold climates)
- Sand filters/filter strips
- Vegetative practices, such as bioswales and rain gardens
- Catch basin inserts

8.5.2 Non-Structural BMPs

- Buffer zones
- Open space design
- Urban forestry
- Green parking
- Alternative pavers

In addition, long term erosion control is facilitated by properly maintaining existing landscaping to prevent soil erosion.

8.6 IMPLEMENTATION/MEASURABLE GOALS

The following measurable goals are used to assess the progress of BMP implementation:

- Review/documentation of existing systems has been completed
- Use of a form to track maintenance of implemented BMPs and to identify/schedule BMPs that may need to be renovated or re-engineered
- Tracking BMPs implemented should new construction or renovation be planned while the current permit is in effect

The post-construction runoff rate and volume of discharges shall not exceed the pre-development rate and volume for all storms up to the two-year, 24-hour storm at the site. New structural stormwater controls for water quantity, if constructed during redevelopment activities, must be designed and implemented in accordance with this rate standard.

BMPs will be designed on a site-specific basis to reduce post-development total suspended solids (TSS) loadings by 80 percent or achieve a discharge TSS concentration not to exceed 80 milligrams

per liter. GLPS will ensure that the minimum treatment volume standard for each new construction or redevelopment project where the area of disturbance exceeds one acre shall be one inch of runoff from the entire development site. Following construction, TSS concentrations will be measured to ensure the effectiveness of the BMPs.

Structural and vegetative BMPs will be maintained in perpetuity in order to ensure the above performance standards continue to be met.

REPORT SIGNATURES

The author of this SWMP is Mr. Donald C. Kaylor, Professional Geologist (Indiana, Tennessee) and Certified Stormwater Operator (Michigan). Mr. Kaylor is a Department Manager employed by Testing Engineers & Consultants, Inc. (TEC). TEC may be contacted at:

Testing Engineers & Consultants, Inc.

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PO Box 249	1343 Rochester Rd
Troy, MI 48099-0249	Troy, MI 48083-6015
Tel: 248.588.6200	dkaylor@tectest.com
Fax: 248.588.6232	www.testingengineers.com

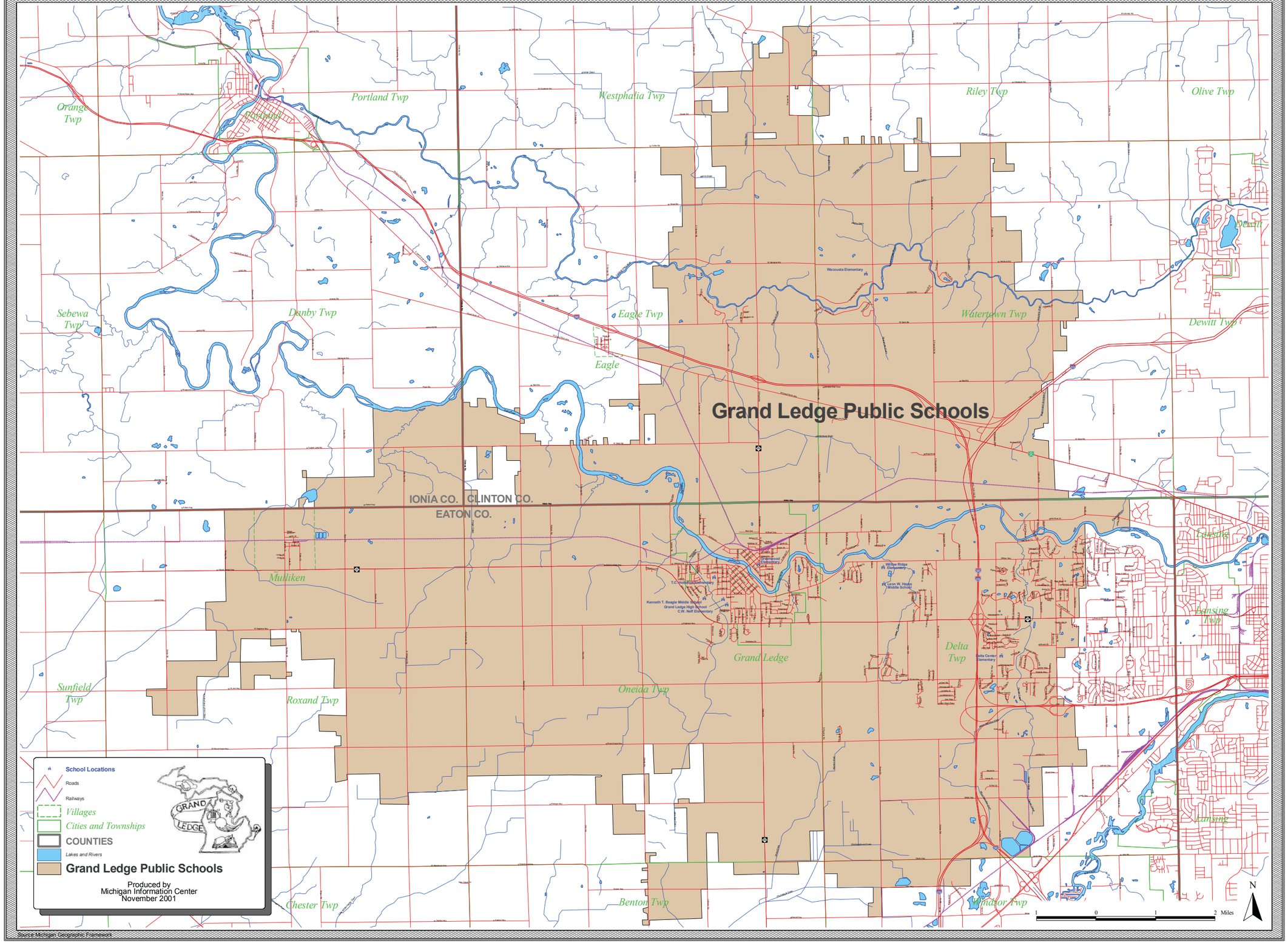
Prepared by:

Donald C. Kaylor, PG (IN, TN), CP (MI), EP
Manager, Environmental Assessment

ATTACHMENT A

DISTRICT MAP

Grand Ledge Public Schools



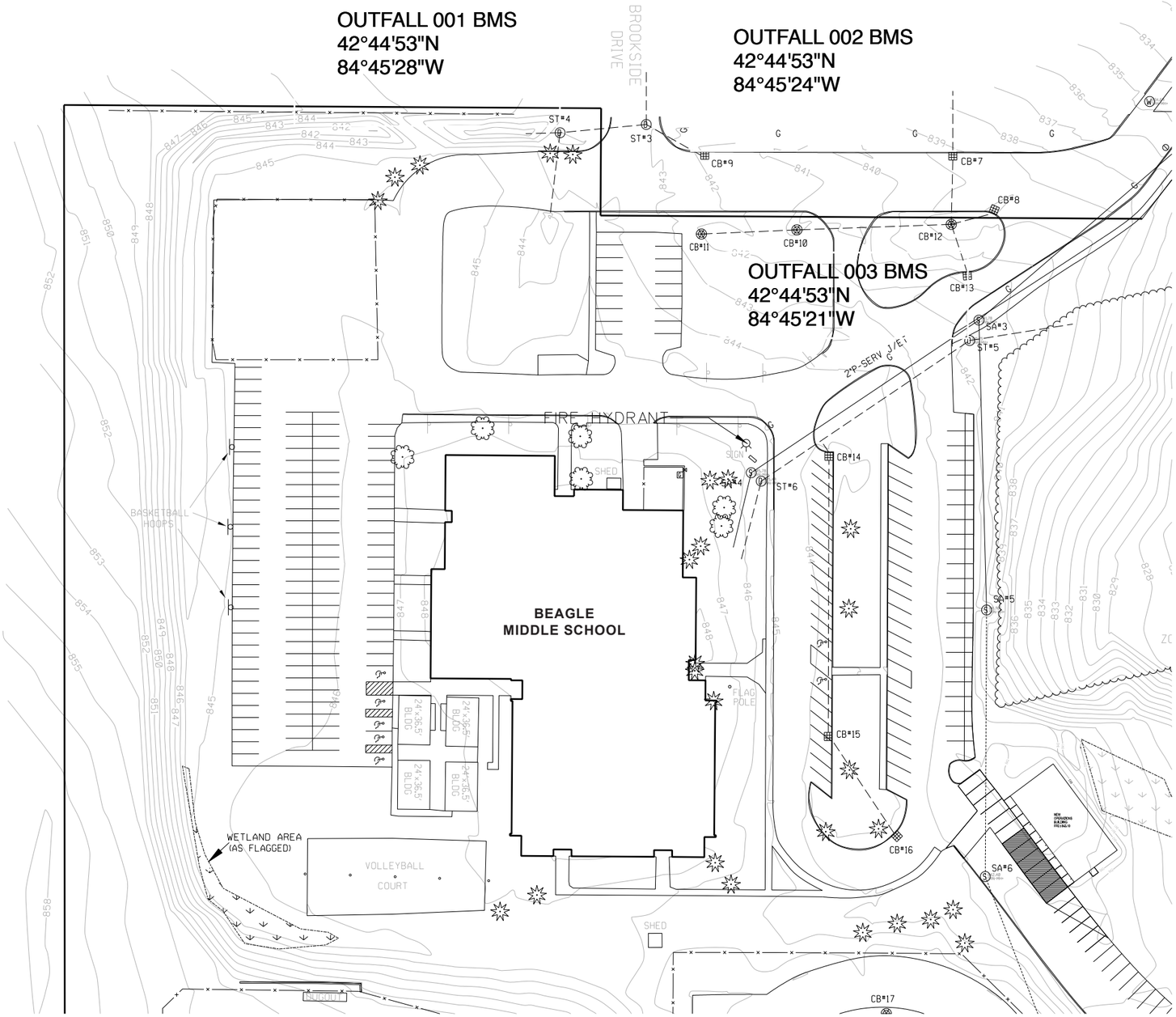
Source: Michigan Geographic Framework

ATTACHMENT B

FACILITIES SITE MAPS

Outfall data added: 5/18/10

Source documents from GMB Architecture + En



GRAND LEDGE PUBLIC SCHOOLS
Beagle Middle School

N

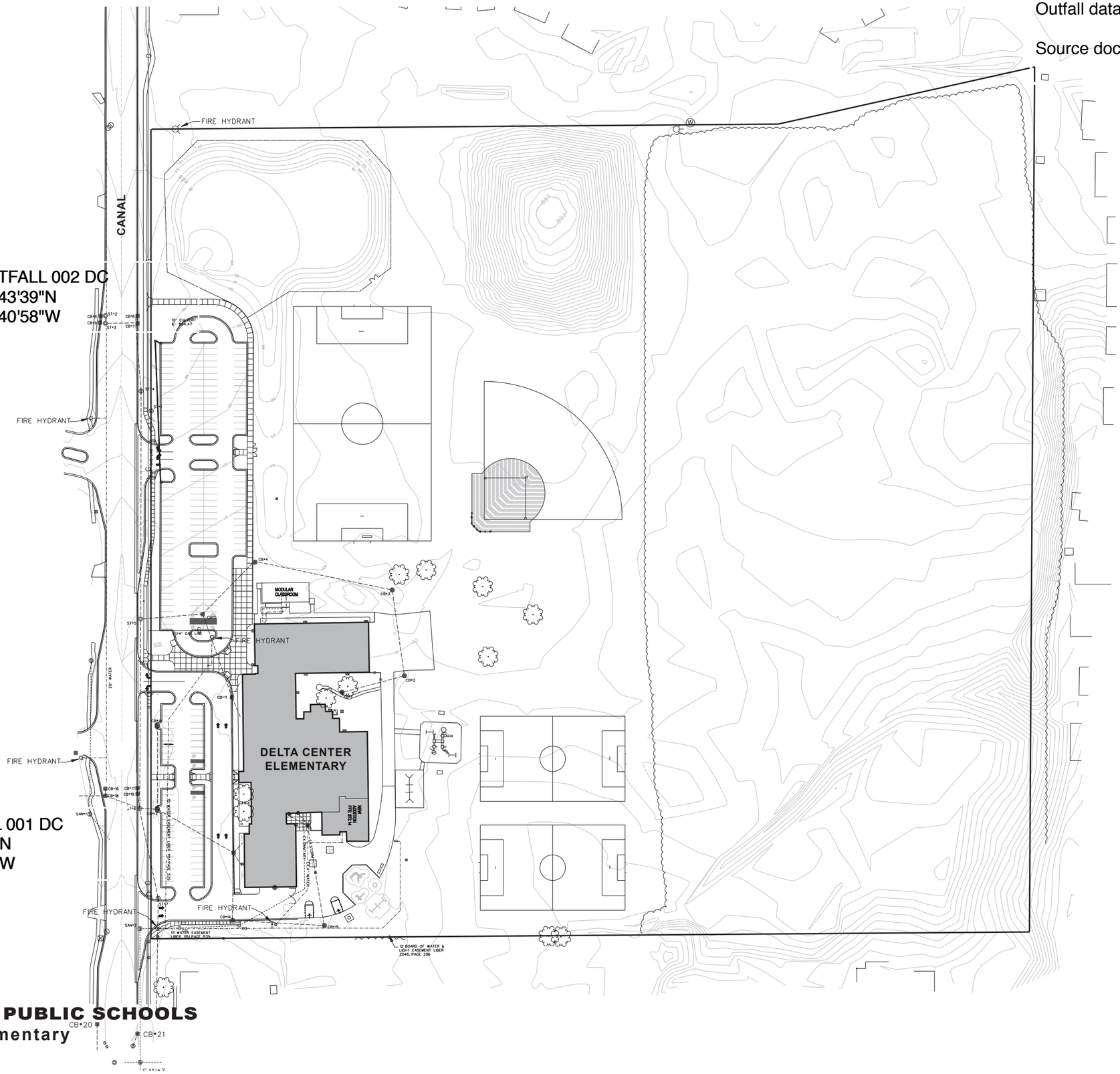
2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + Er

OUTFALL 002 DC
42°43'39"N
84°40'58"W

OUTFALL 001 DC
42°43'44"N
84°39'48"W



GRAND LEDGE PUBLIC SCHOOLS
Delta Center Elementary

N

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + En

OUTFALL 001 OP
42°45'2"N
84°41'51"W

OUTFALL 002 OP
42°45'2"N
84°41'51"W

BUS FLEET PARKING

TRANSPORTATION OPERATIONS

OUTFALL 003 HMS
42°45'2"N
84°41'52"W

8" WATERMAIN

HAYES MIDDLE SCHOOL

NEW BUS LOOP

STUDENT DROP-OFF / PARKING

OUTFALL 002 HMS
42°44'59"N
84°42'7"W

OUTFALL 001 HMS
42°44'50"N
84°42'8"W

GRAND LEDGE PUBLIC SCHOOLS
Hayes Middle School

N

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + En

OUTFALL 003 HS
42°44'47"N
84°45'21"W

OUTFALL 002 HS
42°44'47"N
84°45'18"W

OUTFALL 001 HS
42°44'47"N
84°45'8"W

OUTFALL 015 HS
42°44'47"N
84°45'25"W

OUTFALL 004 HS
42°44'44"N
84°45'8"W

OUTFALL 012 HS
42°44'41"N
84°45'22"W

OUTFALL 014 HS
42°44'40"N
84°45'26"W

OUTFALL 005 HS
42°44'39"N
84°45'20"W

OUTFALL 013 HS
42°44'40"N
84°45'25"W

OUTFALL 011 HS
42°44'40"N
84°45'21"W

OUTFALL 006 HS
42°44'39"N
84°45'19"W

OUTFALL 007 HS
42°44'38"N
84°45'19"W

OUTFALL 010 HS
42°44'37"N
84°45'3"W

OUTFALL 008 HS
42°44'37"N
84°45'18"W

OUTFALL 009 HS
42°44'36"N
84°45'17"W

KENT STREET
SPRING STREET
LOVELL STREET
MARSH DRIVE
MAINTENANCE
CONSTRUCTION ZONE FOR
2009 - 2010 SCHOOL YEAR
HIGH SCHOOL
BRIDGE CROSSING
FIRE HYDRANT
KENT'S ADDITION
BLOCK 2

GRAND LEDGE PUBLIC SCHOOLS
High School

N

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + En

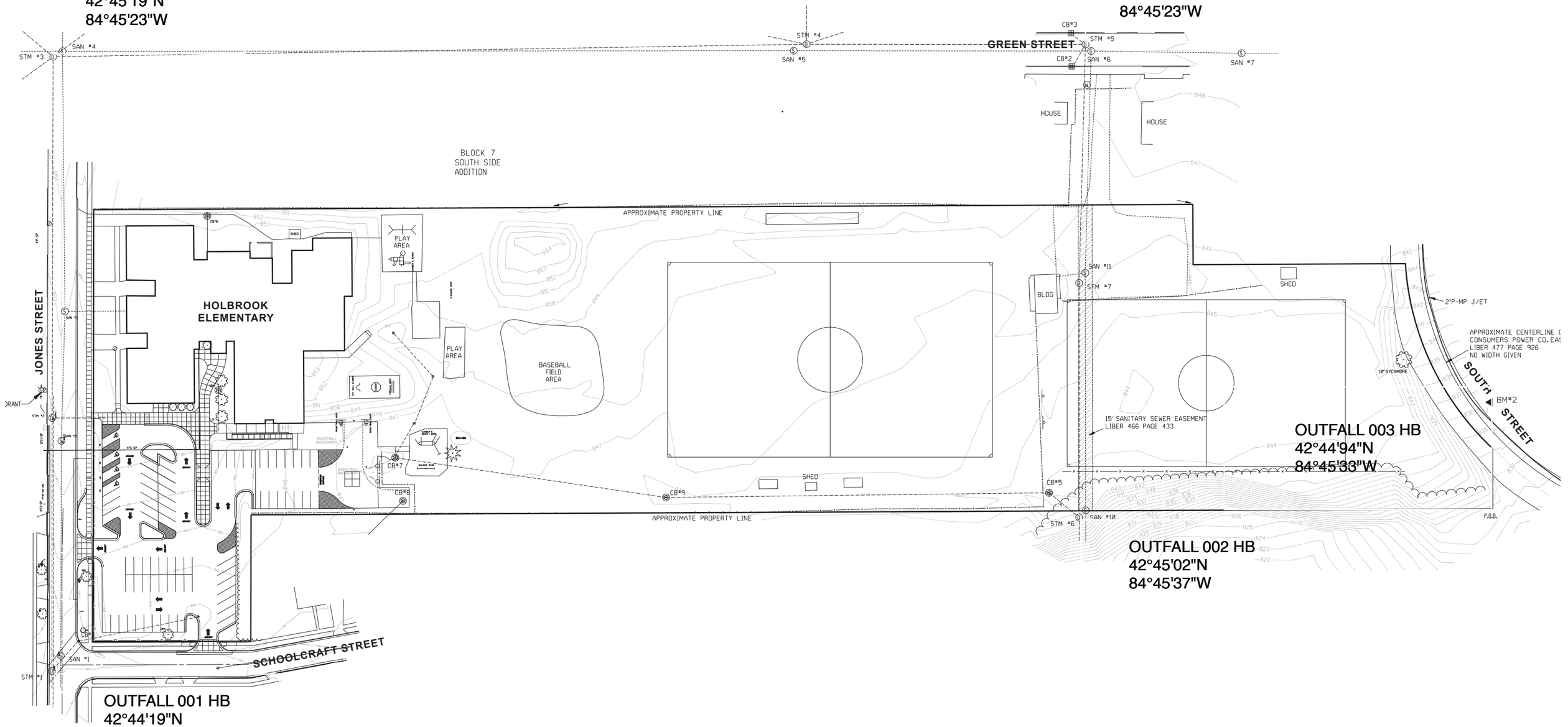
OUTFALL 005 HB
42°45'19"N
84°45'23"W

OUTFALL 004 HB
42°45'01"N
84°45'23"W

OUTFALL 003 HB
42°44'94"N
84°45'33"W

OUTFALL 002 HB
42°45'02"N
84°45'37"W

OUTFALL 001 HB
42°44'19"N
84°45'12"W



GRAND LEDGE PUBLIC SCHOOL
Holbrook Elementary

N

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + Er

OUTFALL 004 HS
42°44'53"N
84°45'24"W

OUTFALL 002 NEF
42°44'75"N
84°44'75"W

MARSH
FIELD

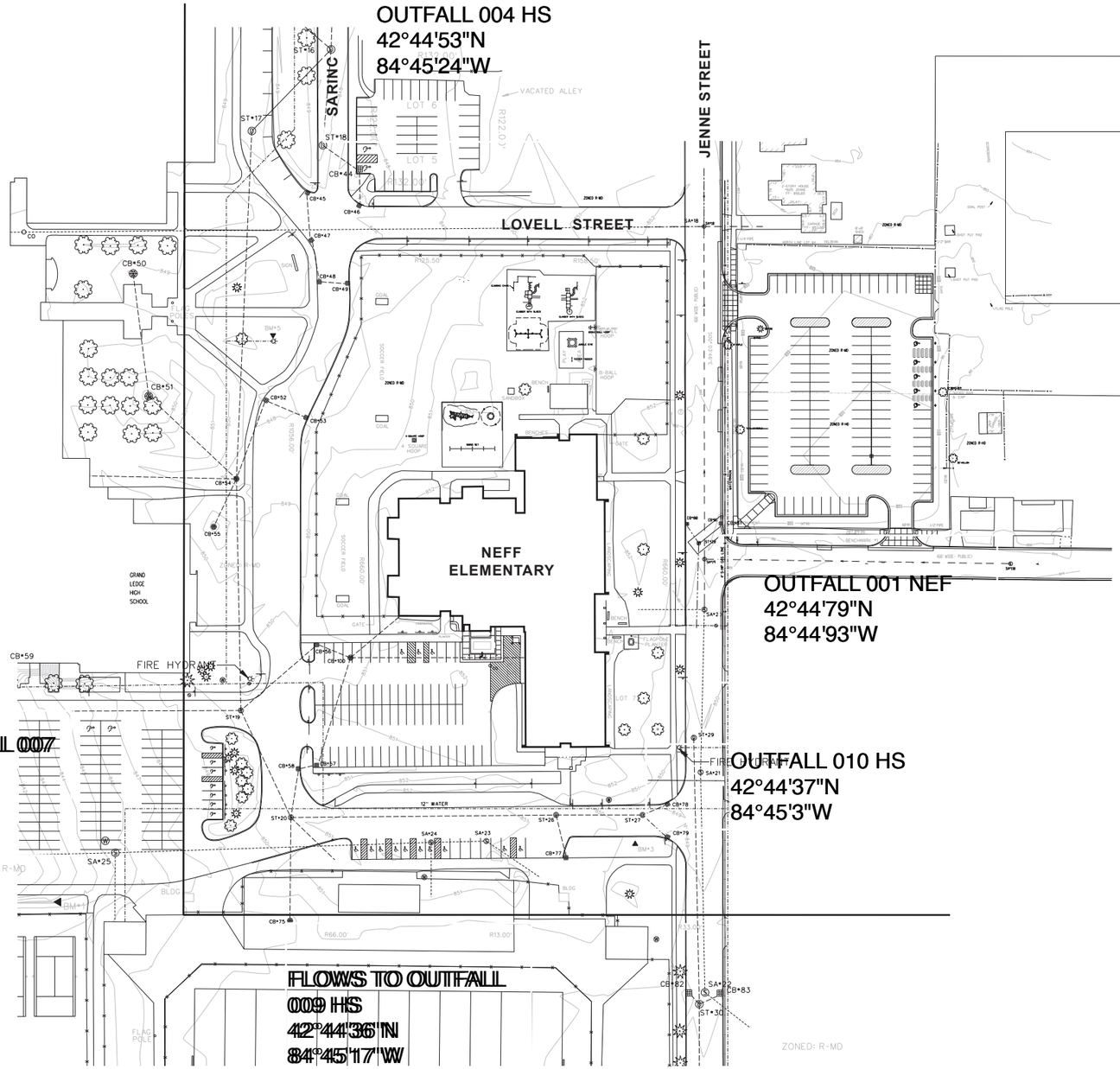
OUTFALL 001 NEF
42°44'79"N
84°44'93"W

OUTFALL 003 NEF
42°44'74"N
84°44'81"W

FLOWS TO OUTFALL 007 HS
42°44'38"N
84°45'19"W

OUTFALL 010 HS
42°44'37"N
84°45'3"W

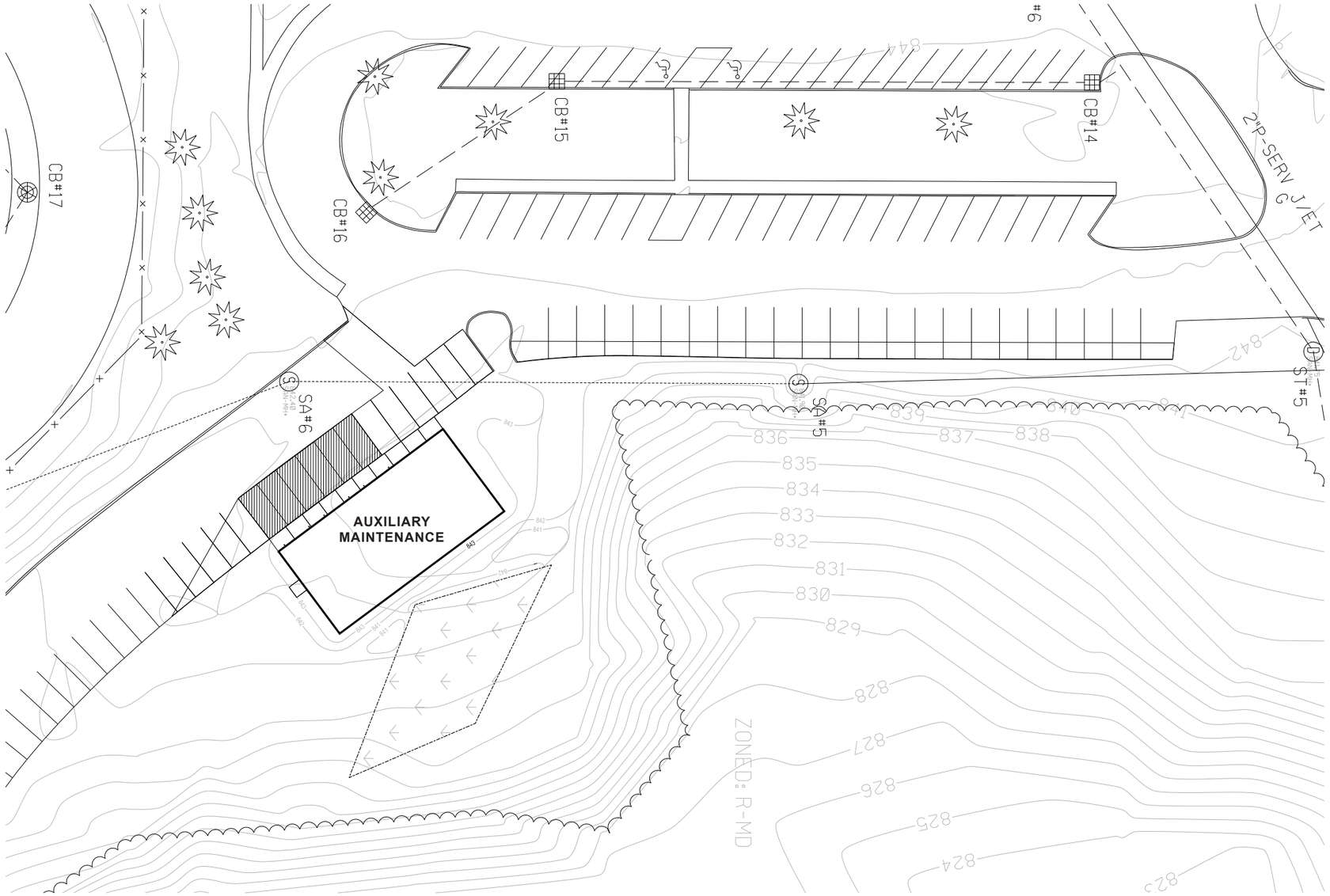
FLOWS TO OUTFALL 009 HS
42°44'36"N
84°45'17"W



GRAND LEDGE PUBLIC SCHOOLS
Neff Elementary

N

2009



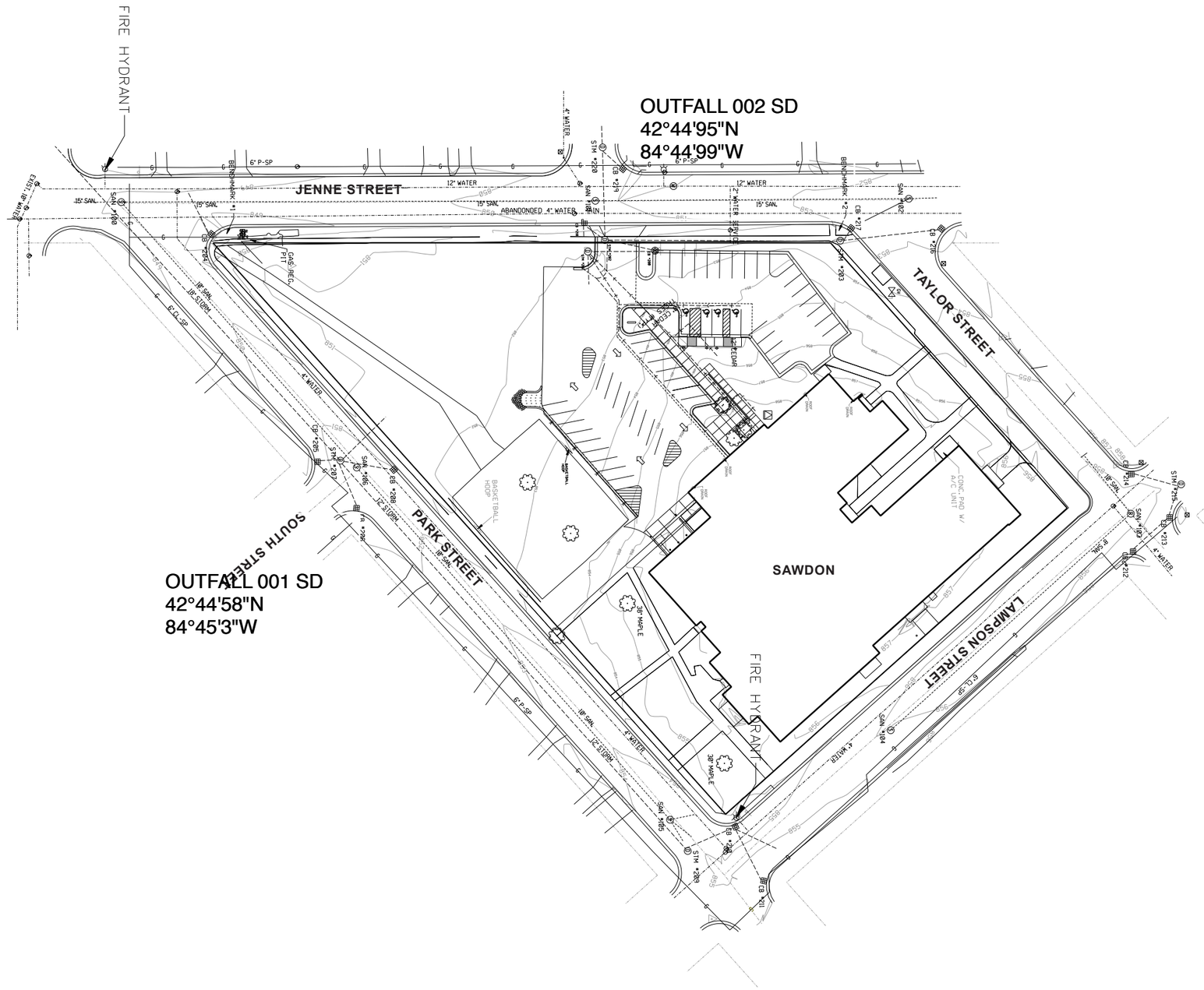
GRAND LEDGE PUBLIC SCHOOLS
Operations Building

N

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + En

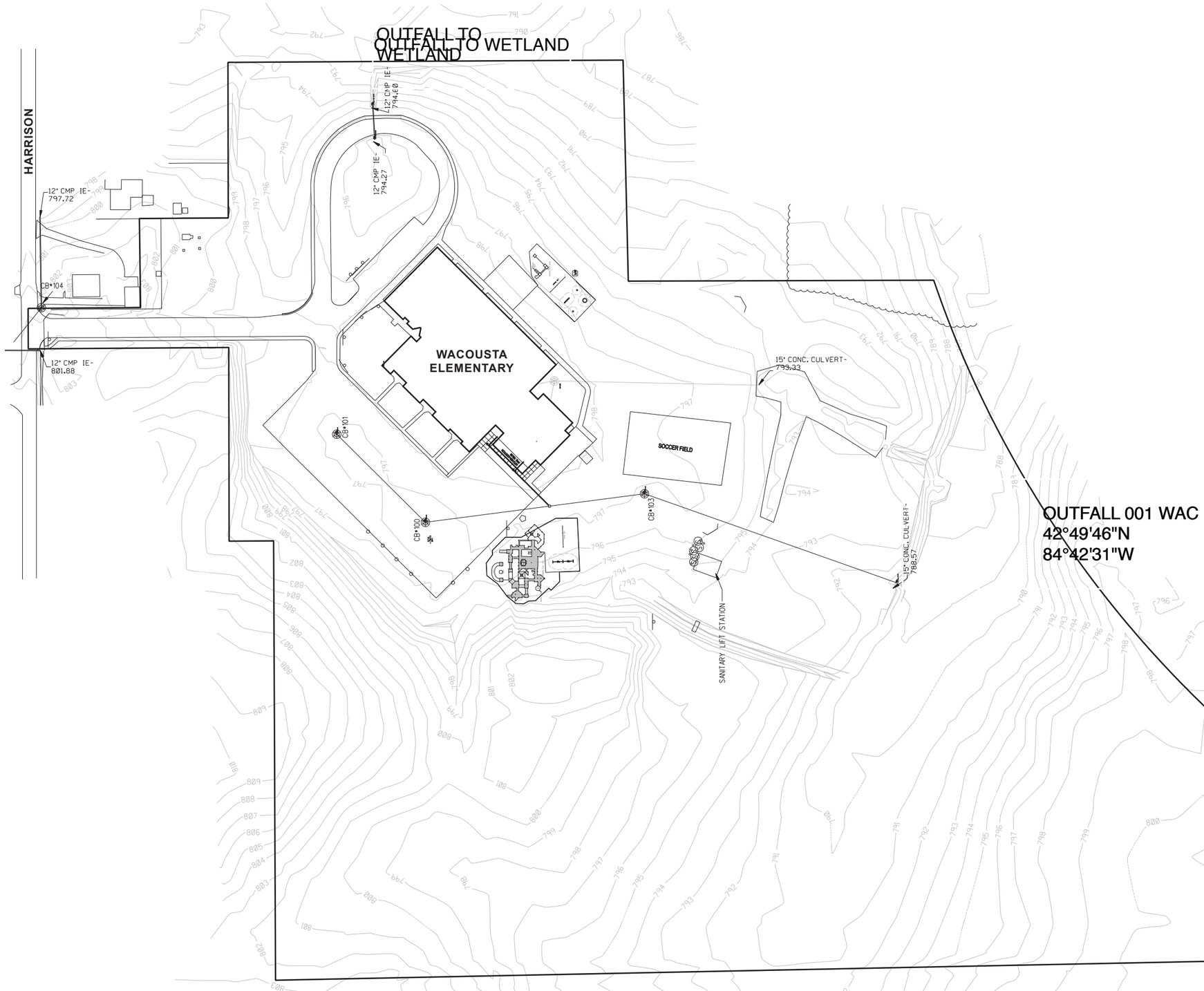


GRAND LEDGE PUBLIC SCHOOLS
Sawdon

2009

Outfall data added: 5/18/10

Source documents from GMB Architecture + En



GRAND LEDGE PUBLIC SCHOOL
Wacousta Elementary

N

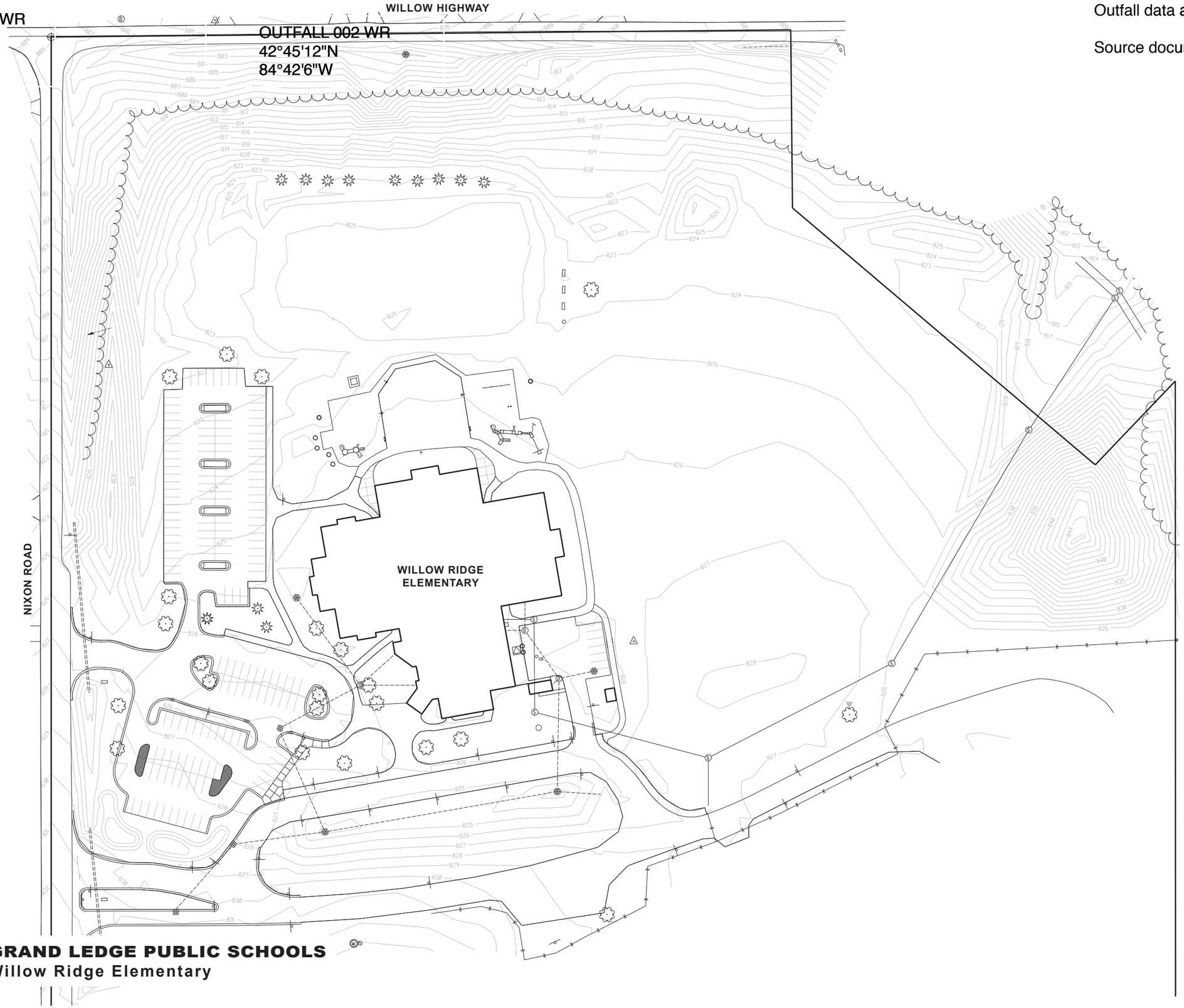
2009

OUTFALL 001 WR
42°45'8"N
84°42'6"W

OUTFALL 002 WR
42°45'12"N
84°42'6"W

Outfall data added: 5/18/10

Source documents from GMB Architecture + Er



GRAND LEDGE PUBLIC SCHOOLS
Willow Ridge Elementary

N

2009

ATTACHMENT C

INVENTORY OF STRUCTURAL STORMWATER CONTROLS

INVENTORY OF STRUCTURAL STORM WATER CONTROLS

January 2013
Grand Ledge Public Schools

Location	Controls
Beagle Elementary & Operations Building 600 West South Street Grand Ledge, MI 48837	11 Catch Basins
Delta Center Elementary 305 South Canal Road Lansing, MI 48917	21 Catch Basins
Hayes Middle School 12620 Nixon Road Grand Ledge, MI 48837	8 Catch Basins
High School & Neff Elementary 820 Spring Street/950 Jenne Street Grand Ledge, MI 48837	59 Catch Basins
Holbrook Elementary 615 Jones Street Grand Ledge, MI	9 Catch Basins
Sawdon 220 Lamson Street Grand Ledge, MI 48837	15 Catch Basins
Wacousta Elementary 9135 Herbison Road Eagle, MI 48822	4 Catch Basins
Willow Ridge Elementary 12840 Nixon Road Grand Ledge, MI 48837	8 Catch Basins

ATTACHMENT D

GLPS LETTER DATED JULY 12, 2012

Grand Ledge Public Schools
A Community Committed to Excellence

Dr. Brian Metcalf / Superintendent of Schools

To: Ms. Stephanie Kammer, DEQ
Ms. Christe Alwin, DEQ-WRD
From: Matthew J. Losch, Executive Director of Operations,
Grand Ledge Public Schools
Date: July 12, 2012
Re: Verification Statement

This letter is being submitted to the DEQ to validate the discussions conducted during our on-site Strom Water Management Review in May of 2012. Grand Ledge Public Schools has completed or conducted the following actions per request of Ms. Stephanie Kammer.

- The Operations Department Garage air compressor moister drain line has been disconnected for the previous down spout drain and relocated. The new route of the air compressor drain is connected directly with the sanitary sewer system which has oil separation system designed into it. We are also in the process of installing an air dryer system to the air compressor to reduce the initial amount of moisture going into the air tank.

- All Custodial and Maintenance staff have been re-trained on the importance of keeping lids closed on district trash dumpsters at all school buildings.

- The large 30 yard metal recycling dumpster located behind the Operations Facility was properly tarped and covered. However, we have found the need to build a support frame to keep the tarp from collapsing when we receive 4 inches of rain. The tarp frame should be completed this month.

- A significant rewrite of our district Storm Water Management plan has been conducted and will be submitted on or before September 8, 2012. We have addressed the concerns identified by Ms. Kammer in her inspection report. We have clarified the definition of Public to meet the intent of the inspection report and will be placing our new improved Strom Water Management plan on our district Web Site with appropriate links to EPA Storm Water Management information. We will also be establishing a direct Web address to obtain feedback and comments from the community at large.

- The school district has contracted to have all storm drains, garage drains and septic / storm water holding tank properly cleaned and pumped three times a year, with manifests provided validating proper disposal. The district has also contracted services to sweep clean all parking lots and street curbs throughout the district three times per year or as needed.

ATTACHMENT E

EMPLOYEE AWARENESS TRAINING MATERIALS

United States Environmental Protection Agency | Office of Water (4203) | EPA 833-F-00-002 January 2000 (revised December 2005) Fact Sheet 2.0

Stormwater Phase II Final Rule

Small MS4 Stormwater Program Overview

Stormwater Phase II Final Rule Fact Sheet Series

Overview

1.0 – Stormwater Phase II Final Rule: An Overview

Small MS4 Program

2.0 – Small MS4 Stormwater Program Overview

2.1 – Who's Covered? Designation and Waivers of Regulated Small MS4s

2.2 – Urbanized Areas: Definition and Description

Minimum Control Measures

2.3 – Public Education and Outreach

2.4 – Public Participation/ Involvement

2.5 – Illicit Discharge Detection and Elimination

2.6 – Construction Site Runoff Control

2.7 – Post-Construction Runoff Control

2.8 – Pollution Prevention/Good Housekeeping

2.9 – Permitting and Reporting: The Process and Requirements

2.10 – Federal and State-Operated MS4s: Program Implementation

Construction Program

3.0 – Construction Program Overview

3.1 – Construction Rainfall Erosivity Waiver

Industrial "No Exposure"

4.0 – Conditional No Exposure Exclusion for Industrial Activity

Polluted storm water runoff is often transported to municipal separate storm sewer systems (MS4s) and ultimately discharged into local rivers and streams without treatment. EPA's Stormwater Phase II Rule establishes an MS4 stormwater management program that is intended to improve the Nation's waterways by reducing the quantity of pollutants that stormwater picks up and carries into storm sewer systems during storm events. Common pollutants include oil and grease from roadways, pesticides from lawns, sediment from construction sites, and carelessly discarded trash, such as cigarette butts, paper wrappers, and plastic bottles. When deposited into nearby waterways through MS4 discharges, these pollutants can impair the waterways, thereby discouraging recreational use of the resource, contaminating drinking water supplies, and interfering with the habitat for fish, other aquatic organisms, and wildlife.

In 1990, EPA promulgated rules establishing Phase I of the National Pollutant Discharge Elimination System (NPDES) stormwater program. The Phase I program for MS4s requires operators of "medium" and "large" MS4s, that is, those that generally serve populations of 100,000 or greater, to implement a stormwater management program as a means to control polluted discharges from these MS4s. The Stormwater Phase II Rule extends coverage of the NPDES stormwater program to certain "small" MS4s but takes a slightly different approach to how the stormwater management program is developed and implemented.

What Is a Phase II Small MS4?

A small MS4 is any MS4 not already covered by the Phase I program as a medium or large MS4. The Phase II Rule automatically covers on a nationwide basis all small MS4s located in "urbanized areas" (UAs) as defined by the Bureau of the Census (unless waived by the NPDES permitting authority), and on a case-by-case basis those small MS4s located outside of UAs that the NPDES permitting authority designates. For more information on Phase II small MS4 coverage, see Fact Sheets 2.1 and 2.2.

What Are the Phase II Small MS4 Program Requirements?

Operators of regulated small MS4s are required to design their programs to:

- ❑ Reduce the discharge of pollutants to the "maximum extent practicable" (MEP);
- ❑ Protect water quality; and
- ❑ Satisfy the appropriate water quality requirements of the Clean Water Act.

Implementation of the MEP standard will typically require the development and implementation of BMPs and the achievement of measurable goals to satisfy each of the six minimum control measures.

The Phase II Rule defines a small MS4 stormwater management program as a program comprising six elements that, when implemented in concert, are expected to result in significant reductions of pollutants discharged into receiving waterbodies.

The six MS4 program elements, termed "minimum control measures," are outlined below. For more information on each of these required control measures, see Fact Sheets 2.3 – 2.8.

❶ ***Public Education and Outreach***
Distributing educational materials and performing outreach to inform citizens about the impacts polluted stormwater runoff discharges can have on water quality.

❷ ***Public Participation/Involvement***
Providing opportunities for citizens to participate in program development and implementation, including effectively publicizing public hearings and/or encouraging citizen representatives on a stormwater management panel.

❸ ***Illicit Discharge Detection and Elimination***
Developing and implementing a plan to detect and eliminate illicit discharges to the storm sewer system (includes developing a system map and informing the community about hazards associated with illegal discharges and improper disposal of waste).

❹ ***Construction Site Runoff Control***
Developing, implementing, and enforcing an erosion and sediment control program for construction activities that disturb 1 or more acres of land (controls could include silt fences and temporary stormwater detention ponds).

❺ ***Post-Construction Runoff Control***
Developing, implementing, and enforcing a program to address discharges of post-construction stormwater runoff from new development and redevelopment areas. Applicable controls could include preventative actions such as protecting sensitive areas (e.g., wetlands) or the use of structural BMPs such as grassed swales or porous pavement.

❻ ***Pollution Prevention/Good Housekeeping***
Developing and implementing a program with the goal of preventing or reducing pollutant runoff from municipal operations. The program must include municipal staff training on pollution prevention measures and techniques (e.g., regular street sweeping, reduction in the use of pesticides or street salt, or frequent catch-basin cleaning).

What Information Must the NPDES Permit Application Include?

The Phase II program for MS4s is designed to accommodate a general permit approach using a Notice of Intent (NOI) as the permit application. The operator of a regulated small MS4 must include in its permit application, or NOI, its chosen BMPs and measurable goals for each minimum control measure. To help permittees identify the most appropriate BMPs for their programs, EPA issued a Menu of BMPs to serve as guidance. NPDES permitting authorities can modify the EPA menu or develop their own list. For more information on application requirements, see Fact Sheet 2.9.

What Are the Implementation Options?

The rule identifies a number of implementation options for regulated small MS4 operators. These include sharing responsibility for program development with a nearby regulated small MS4, taking advantage of existing local or State programs, or participating in the implementation of an existing Phase I MS4's stormwater program as a co-permittee. These options are intended to promote a regional approach to stormwater management coordinated on a watershed basis.

What Kind of Program Evaluation/Assessment Is Required?

Permittees need to evaluate the effectiveness of their chosen BMPs to determine whether the BMPs are reducing the discharge of pollutants from their systems to the "maximum extent practicable" and to determine if the BMP mix is satisfying the water quality requirements of the Clean Water Act. Permittees also are required to assess their progress in achieving their program's measurable goals. While monitoring is not required under the rule, the NPDES permitting authority has the discretion to require monitoring if deemed necessary. If there is an indication of a need for improved controls, permittees can revise their mix of BMPs to create a more effective program. For more information on program evaluation/assessment, see Fact Sheet 2.9.

For Additional Information

Contacts

☞ U.S. EPA Office of Wastewater Management
http://www.epa.gov/npdes/stormwater
Phone: 202-564-9545

☞ Your NPDES Permitting Authority. Most States and Territories are authorized to administer the NPDES Program, except the following, for which EPA is the permitting authority:

Alaska	Guam
District of Columbia	Johnston Atoll
Idaho	Midway and Wake Islands
Massachusetts	Northern Mariana Islands
New Hampshire	Puerto Rico
New Mexico	Trust Territories
American Samoa	

☞ A list of names and telephone numbers for each EPA Region and State is located at http://www.epa.gov/npdes/stormwater (click on "Contacts").

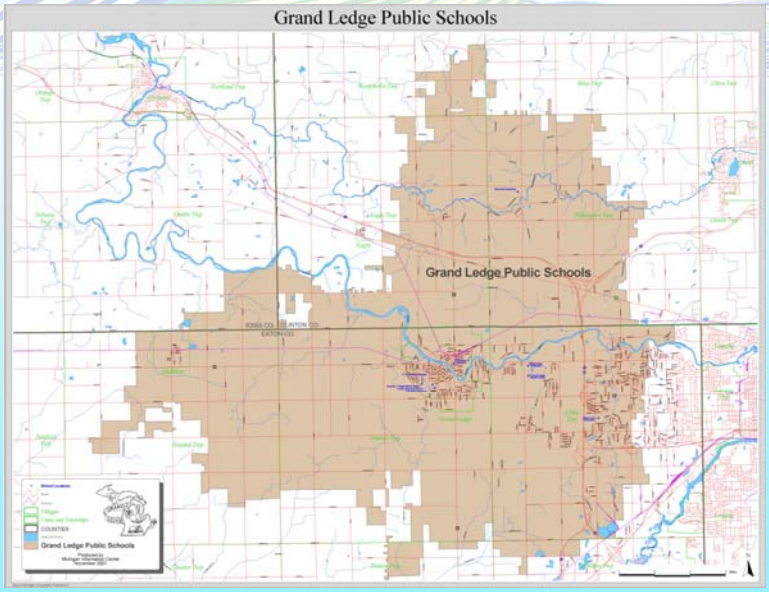
Reference Documents

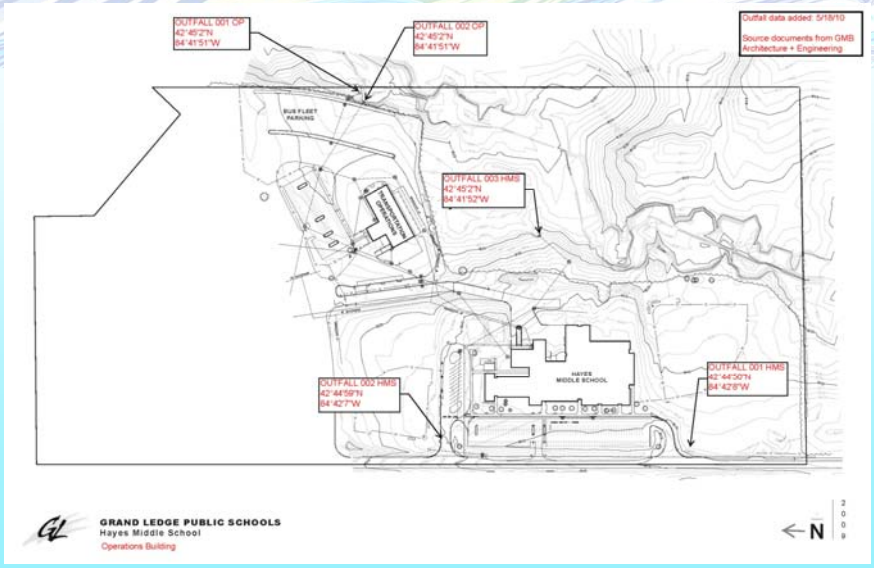
☞ EPA's Stormwater Web Site
http://www.epa.gov/npdes/stormwater

- Stormwater Phase II Final Rule Fact Sheet Series
- Stormwater Phase II Final Rule (64 *FR* 68722)
- National Menu of Best Management Practices for Stormwater Phase II
- Measurable Goals Guidance for Phase II Small MS4s
- Stormwater Case Studies
- And many others

NPDES Phase II Storm Water Requirements for School Facilities

Presented by:
Donald Kaylor, PG, CSO
Testing Engineers & Consultants, Inc.





Why Care about Storm Water?

- Rain & Snow Become "Storm Water" When they Hit the Ground
- Affects the Health of our Lakes and Streams
- It is the Law

Why Care about Storm Water?

- Unlike wastewater which is carried from our kitchens, bathrooms, and house drains through the sanitary sewers to be treated at wastewater plants, storm water is untreated. It flows through storm water ways directly into creeks, lakes, and rivers which eventually discharge into our bays and oceans that we use for swimming, fishing and drinking water.

Why Care about Storm Water?

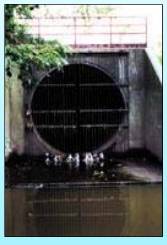
Pollutants fall on impervious surface

Oil in parking lot

Polluted storm water enters storm drain

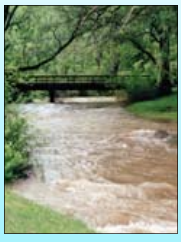
Typical roadside catch basin

Storm water enters waterway



Storm drain outfall

Impaired waterway



Sedimentation and flooding during rain event

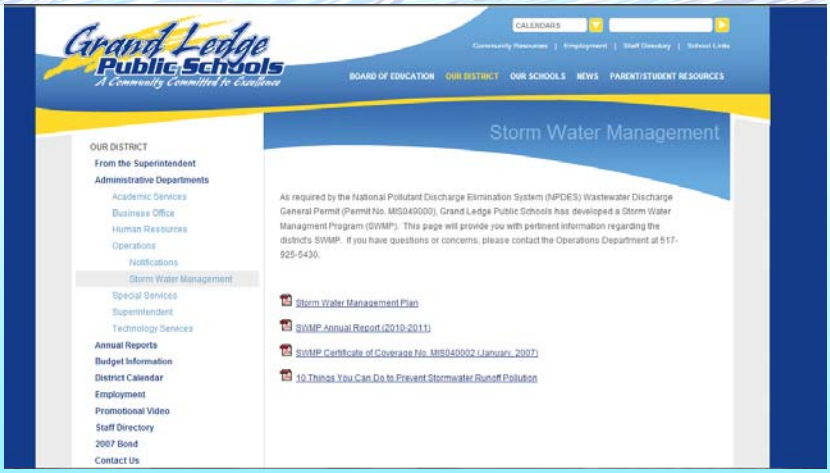
What are the NPDES Phase II Storm Water Regulations?

- NPDES Phase II Rules
  - Federal & State Regulations
- NPDES Phase II Goal
  - To reduce the discharge of pollutants to the "maximum extent practicable" to protect water quality
- GLPS Requirements
  - Complete Storm Water Management Plan (SWMP)
  - GLPS SWMP updated in January 2014
  - Implement SWMP to achieve goal

Public Education and Outreach

- Includes Education on Numerous Topics
  - Training materials:
    - A Citizen's Guide to Stormwater
    - A Household Hazardous Waste Word Search
    - After the Storm
    - Stop Pointless Personal Pollution!
    - EPA Materials (bookmarks)
    - GLPS website

Public Education and Outreach



Public Participation and Involvement

- Notice of the SWMP
- Creation of Advisory Committee
- Work with Watershed Groups

Illicit Discharge Detection and Elimination

- Illicit Discharge: "Unauthorized" release into the storm water system (i.e., dumping of floor mop water into a storm sewer)

Illicit Discharge Detection and Elimination

Construction Site Runoff Control

- Prohibit Discharges to the Storm Water System

Post Construction Runoff Control

- Design all Projects with Minimal Overall Impact to the Storm Water System

Post Construction Runoff Control

label outfalls

Pollution Prevention/ Good Housekeeping

- Examples of Tasks to be Implemented:
  - Chemical waste handling
  - Proper use and storage of lawn chemicals, pesticides, & fertilizers
  - Inspect/maintain catch basins
  - Good housekeeping practices at bus garage and operations & maintenance areas
  - Vehicle maintenance
  - Close lids on dumpsters

Summary

- What we do on the land affects the quality of the water we drink and use in so many ways.
- Many small sources of pollution add up to cause big water quality problems.
- Natural things such as soil, leaves, grass clippings and pet waste can cause water pollution.
- Waste dumped into storm sewers goes into lakes, streams and coastal waters without treatment.
- Automobiles and other vehicles cause water pollution as well as air pollution.
- Everyone can make a difference!

Summary

- SWMP is common sense
- Maintenance/Custodial Staff are the First Line of Defense
  - If you see anything going into a storm sewer, inform the Operations Director **ASAP**.

Q & A

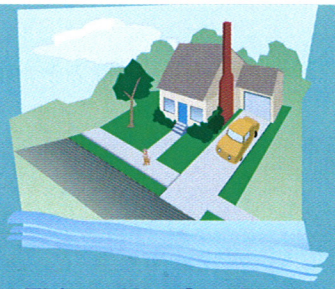
- Any question or comments?

ATTACHMENT F

PEP PROGRAM MATERIALS

Clean Water

Everybody's Business



10 Things You Can Do to Prevent Stormwater Runoff Pollution

- Use fertilizers sparingly and sweep up driveways, sidewalks, and roads
- Never dump anything down storm drains
- Vegetate bare spots in your yard
- Compost your yard waste
- Avoid pesticides; learn about Integrated Pest Management (IPM)
- Direct downspouts away from paved surfaces
- Take your car to the car wash instead of washing it in the driveway
- Check car for leaks, and recycle motor oil
- Pick up after your pet
- Have your septic tank pumped and system inspected regularly

Be Stormwater Savvy

Don't let a good drop go bad!

EPA

www.epa.gov/npdes/stormwater

ATTACHMENT G

INSPECTION AND RECORDKEEPING FORMS

STORM WATER INCIDENT/VIOLATION LOG
GRAND LEDGE PUBLIC SCHOOLS

Facility Name: _____ Date of Discovery: _____

Location of Incident/Violation: _____

Reported by: _____

Nature of Incident/Violation:

_____

_____

_____

_____

_____

_____

Plan for Corrective Action:

_____

_____

_____

_____

_____

_____

Anticipated Date of Return to Compliance: _____ **Date Resolved:** _____

Name of Individual Responsible for Corrective Action: _____

Signature of Individual Responsible for Corrective Action: _____

STORMWATER DRY WEATHER SCREENING
GRAND LEDGE PUBLIC SCHOOLS

Facility:_____ Date:_____

Outfall Description:_____

_____

OUTFALL OBSERVATIONS				
Characteristics	**Yes**	**No**	**NA**	**Comments**
Water present				
Water flowing				
Bacterial sheens				
Oil sheens				
Suds / Foam				
Floating materials				
Algae				
Slime				
Debris				
Odor				
Structure staining				
Structural integrity				
Stressed vegetation				
Stained vegetation				
Water Clarity: Clear Cloudy				
Water Color: Clear Yellowish Greenish Brownish				

Possible Illicit Discharge Sources (circle one or more, as appropriate)	
Water line flushing or potable water sources	Swimming pools
Irrigation runoff	Diverted stream flow
Lawn watering runoff	Groundwater springs
Air conditioning condensate	Groundwater from infiltration
Car washing	Pumped groundwater from dewatering
Street washing	Undocumented connections
Interior wash water	Other:

Stormwater: General Inspection Checklist

Department:
Program: Stormwater
Owner: GLPS
Authority: Permit # MIS040002

This inspection checklist can be used by area managers to

- Conduct general inspections
- Determine if additional best management practices (BMPs) may be required

Note For a complete list of all BMP categories, see GLPS SWMP

Division:	**Bldg#/ Area:**	**Date:**
Location:	**Time:**	
Inspector:	**Title:**	

GOOD HOUSEKEEPING		**(Circle one)**		
1.	Are outside areas kept neat, clean, and orderly?	**yes**	**no**	**n/a**
2.	Are storm drain inlets labeled "No Dumping, Flows to Bay?"	**yes**	**no**	**n/a**
3.	Are garbage cans, waste bins, and dumpsters covered?	**yes**	**no**	**n/a**
4.a	Has the stormwater conveyance system been recently altered?	**yes**	**no**	**n/a**
b	If yes, does the alteration maintain SWPPP compliance?	**yes**	**no**	**n/a**
5.	Are stormwater drainage paths clear? Grates clean?	**yes**	**no**	**n/a**
6.a	Are vehicles or equipment cleaned at this facility?	**yes**	**no**	**n/a**
b	If yes, is wash water being collected and disposed of properly?	**yes**	**no**	**n/a**

HAZMAT STORAGE				
8.a	Are vehicles fueled at this location?	**yes**	**no**	**n/a**
b	If yes, are fuel tanks locked and/or properly operated?	**yes**	**no**	**n/a**
c	If yes, are measures taken to protect storm drains from spills?	**yes**	**no**	**n/a**
Briefly describe:				
9.	Do aboveground tanks (liquid) have secondary containment?	**yes**	**no**	**n/a**
10.	Are containment structures or surface slabs liquid tight?	**yes**	**no**	**n/a**
11a	Does this site store hazardous materials such as solvents, pesticides, or acids?	**yes**	**no**	**n/a**
b	If yes, are containers weathertight or covered?	**yes**	**no**	**n/a**
c	If yes, are ignitable or reactive wastes stored at least 50 feet from the property line?	**yes**	**no**	**n/a**
12.a	Has the facility had a hazardous waste spill since the last inspection?	**yes**	**no**	**n/a**
b	If yes, was the problem resulting in the spill corrected?	**yes**	**no**	**n/a**

OTHER BEST MANAGEMENT PRACTICES

13.a	Does this site store hazardous or other materials that could impact the storm drain such as detergent, paint, or powders?	**yes**	**no**	**n/a**
b	If yes, are they stored in a manner prohibiting exposure to rain or runoff?	**yes**	**no**	**n/a**
14.	Are waste materials kept on site in closed leaktight containers?	**yes**	**no**	**n/a**
15.	Are all leaking vehicles or equipment equipped with drip pans?	**yes**	**no**	**n/a**
16.	Are erodible soils uncovered or exposed to rainwater?	**yes**	**no**	**n/a**
17.a	Is the ground surface stained by oil or significant materials?	**yes**	**no**	**n/a**
b	If yes, has the source been found and contained?	**yes**	**no**	**n/a**
18.	Are truck unloading areas covered?	**yes**	**no**	**n/a**
19.	Does the facility have wastes, products, salvaged materials, and recyclables stored properly?	**yes**	**no**	**n/a**
20.a	Does the facility have a clarifier/oil/water separator?	**yes**	**no**	**n/a**
b	If yes, is it clean and functioning properly?	**yes**	**no**	**n/a**
21.a	Has this facility received a complaint regarding stormwater discharge?	**yes**	**no**	**n/a**
b	If yes, has the problem been addressed?	**yes**	**no**	**n/a**
22.	Have personnel received training on Stormwater Pollution Prevention?	**yes**	**no**	**n/a**
23.	Are spill response materials on available? (Check all that apply)	**yes**	**no**	**n/a**

Sand_____Rice Hulls_____Sorbent Booms/Pillows/Blankets_____.
Kitty Litter_____Neutralizer_____Drip Pans_____.
Other (Please List)_____

24. Identify existing management practices employed to reduce pollutants in stormwater discharges: (Check all that apply and describe conditions)

Good Housekeeping_____Containment_____Berms_____
Leachate Collection_____Sand Filter_____
Recycling_____Retention Facilities_____
Silt Fence_____Sorbent Booms_____
Spill Mitigation_____Oil/Water Separator_____
Dead-end Sumps_____
Other_____

25. Action Items:

a. _____

b. _____

c. _____

School Year _____

ANNUAL PEP/PUBLIC INVOLVEMENT CHECKLIST
GRAND LEDGE PUBLIC SCHOOLS

☐ **Conduct Annual Website Survey** Date: _____
- Number of website "hits": _____
- Attach a copy of the findings

☐ **Conduct Annual Staff Training** Date: _____
- Attach a copy of the staff sign-in sheet

☐ **Attend Regional Watershed Permit Group Meeting** Date: _____

☐ **Hold Internal Advisory Committee Meeting (#1)** Date: _____
- Attach a copy of the meeting minutes

☐ **Hold Internal Advisory Committee Meeting (#2)** Date: _____
- Attach a copy of the meeting minutes

☐ **Hold Internal Advisory Committee Meeting (#3)** Date: _____
- Attach a copy of the meeting minutes

Ongoing activities:

☑ **Monitor & Respond to Website E-mails** Date: _____
- Identify responsible staff member: _____

☑ **Monitor Activities of Regional Watershed Group** Date: _____
- Identify responsible staff member: _____

☑ **Distribute Awareness Materials in School Newsletter** Date: _____
- Identify responsible staff member: _____

☑ **Discuss Storm Water Issues at MSBO Meetings** Date: _____
- Identify GLPS representative(s): _____

Describe any additional Public Education/Involvement events or activities below:

☐ **Other: _____** Date: _____

☐ **Other: _____** Date: _____

School Year _____

BMP IMPLEMENTATION TRACKING FORM
GRAND LEDGE PUBLIC SCHOOLS

The following checklist will be used to track performance of pollution prevention/housekeeping activities:

☐ **Conduct Quarterly Fleet Inspection (#1)** Date: _____
☐ **Conduct Quarterly Fleet Inspection (#2)** Date: _____
☐ **Conduct Quarterly Fleet Inspection (#3)** Date: _____
☐ **Conduct Quarterly Fleet Inspection (#4)** Date: _____

- Attach a copy of the findings

☐ **Perform Catch Basin Cleaning (#1)** Date: _____
☐ **Perform Catch Basin Cleaning (#2)** Date: _____
☐ **Perform Catch Basin Cleaning (#3)** Date: _____

☐ **Perform Annual Street Sweeping** Date: _____

☐ **Perform Annual Dry Weather Screening** Date: _____

- Complete the form in Appendix G, Section 2

Track applications of salt/de-icing material below:

Type	Quantity	Location	Date

CONTRACTOR SWMP COMPLIANCE CERTIFICATION
GRAND LEDGE PUBLIC SCHOOLS

Company: _____

Street Address: _____

City/State/Zip: _____

I certify by my signature below that I or I (on behalf of my company and its contractors and agents), as the case may be,

(a) Understand, accept, and will adhere to the provisions of the Storm Water Management Plan (SWMP) for Grand Ledge Public Schools as it pertains to the portion of the project I am or my company is responsible for, and as required under the district's MS4 permit.

(b) Have reviewed and will follow guidance within the DEQ compliance assistance document, *Catch Basin Cleaning Activities Guidance Document*, if street sweeping and/or catch basin cleaning activities are to be performed.

Name of Authorized Agent: _____

Title/Position: _____

Authorized Signature: _____

School Year _____

LAWN MAINTENANCE QUESTIONNAIRE
GRAND LEDGE PUBLIC SCHOOLS

Lawn care is managed and conducted by GLPS. The following questionnaire is used to obtain current information on fertilizer, pesticide, and herbicide application from maintenance staff at each location.

Certified Applicators' Name(s), License Numbers, and Categories:

_____
_____
_____
_____

Please complete the following table for all fertilizer, pesticide, and herbicide applications:

Product	Dose (Quantity/Area)	Location	Application Date

Are any chemicals used that are not pre-mixed prior to purchase? Yes ☐ | No ☐