

Appendix A

Section VII. SWMP

1. Enforcement Response Procedure (ERP) - The Village currently has a complaint response system in place that forwards complaints to the Macomb County Public Works Office (MCPWO). The County utilizes a 24-hour hotline for community and general public use. The Village can be contacted or MCPWO via the 24-hour hotline. The Village has established a reliable system to receive and investigate citizen reports regarding suspicious discharges from storm sewer outfalls, waste dumping, construction sites, etc. The reporting system includes:

- Telephone complaint system with emergency number for non-business hours;
- Complaint documentation and tracking system;
- Follow-up notification to reporting citizens to inform them what corrective actions have been or are being taken.

When the Village receives complaints regarding illicit discharges, it investigates each suspected connection as outlined above and takes appropriate action(s). The Village will handle all ordinance violations as they are identified (by MCPWO, residents, staff, etc.). A form for all IDEP related issues – spills, complaints and follow-up, is utilized. The Village's Enforcement Response Procedure and a copy of the Spill Response & Complaint Form are attached in Appendix D of this application.

In addition, the Village's Code of Ordinances (Appendix G) that regulates enforcement regarding storm sewers, sanitary sewers, and illegal dumping into waters of the state are attached with this application. They are:

- Chapter 14: Environment
- Chapter 20: Land Divisions and Subdivisions
 - Division 4 – Street and Utility Improvement Requirements
- Chapter 34: Solid Waste
- Chapter 44: Utilities
 - Division 2 – Sewer Use Regulations
- DRAFT IDEP Ordinance
- Macomb County Stormwater Design Standards, once approved.

2-3. Public Participation Plan (PPP) – Once the NPDES Permit Application is approved by the Michigan Department of Environmental Quality (MDEQ), the Stormwater Management Plan will be posted on the Village web site. In addition, specifics about the plan will also be included in the Village newsletters with the location of where the entire plan can be viewed and how to comment on it. The email address and phone number for the Village Stormwater Manager will be provided so that residents can comment on the plan. The PPP policy is located in Appendix L of this application.

4-6. Public Education Program (PEP) – The Clinton River Watershed, Anchor Bay and Lake St. Clair Collaborative Public Education Plan can be found in Appendix M of this application. The assessment procedure can be found in Appendix A of the PEP.

A watershed wide Public Education Plan (PEP) was developed to inform the public within the Clinton River Watershed and Clinton River East (CRE) areas about their role in protecting water quality and preventing storm water pollution. The watershed approach allows the partners to share information and resources to address stormwater concerns at their source. Similarly, developing and implementing a public education program on a watershed basis provides a consistent and effective mechanism for protecting water resources across the region, while leveraging financial resources in each community.

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The Clinton River East Subwatershed Advisory group prioritized the key messages that the PEP would cover for the 2015-2020 permit cycle. A representative from each community rated the 11 permit topics as low, medium or high for their individual community. The ratings were based on local knowledge of each community's characteristics and the attitudes of residents.

7. Storm Sewer Map - An outfall map is provided with this application in the IDEP. Storm sewer maps are located at Village Hall and DPW, and is also located in Appendix C.

8-17. Illicit Discharge Elimination Program (IDEP) – The Village will NOT be working collaboratively on the IDEP. The Village currently owns 15 outfalls and will NOT be prioritizing these at this time. All Village-owned outfalls are inspected once per permit cycle. Dry weather inspections are conducted if no rain/precipitation event has occurred for a minimum of 48 hours. If flow is observed in the sewer at that time, it may be attributed to sewage, cooling water, sump pump discharge, infiltration from ground water sources, or runoff from potable water sources such as lawn sprinklers. The Village may be able to locate the source of an illicit connection/discharge solely through visual observation of flow in the storm sewer at manholes. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may lead to the source of a problem without additional sampling.

All storm outfalls that are discharging during dry weather will be investigated further by upstream visual inspection, as-built pipe schematic review, dye and/or smoke testing, sampling, or other investigation as needed to determine the nature and source of the flow. The next round of inspections is scheduled for 2028.

1. Televising - The Village may elect to televise those storm sewers that have suspicious flows to identify pollutant sources that cannot be located through simple visual observation and/or sampling
2. As-built pipe schematic review - Where available, the Village utilizes as-built pipe schematic drawings as a tool to determine the source of an illicit connection/discharge.
3. Dye or smoke testing - The Village conducts physical inspection of commercial and/or residential facilities as needed to verify suspected illicit connections that are detected through visual observations/sampling of yards, outfalls and manholes. As necessary, facility inspections include dye or smoke testing of suspect facility plumbing fixtures to determine if the fixture discharges to the sanitary sewer or to the storm sewer. All facility inspections are documented.
4. Sampling - If flow is observed during the dry weather outfall inspections and visual observations do not lead to a source, the Village will sample the flow for pollutant parameters typically found in illicit connections. Sampling can rule out some dry weather discharges such as groundwater. The sampling will typically begin at the outfall and continue upstream from manhole to manhole until a source is found. The choice of sampling parameters will depend on several factors including:
 - Location of the storm outfall (i.e., in residential or commercial area);
 - Turbidity and color of discharge which could distinguish between an illicit discharge from a commercial establishment versus a residence;
 - Odor associated with discharge such as petroleum odor, or raw sewage odor.

Detailed information can be found in the attached Illicit Discharge Elimination Plan (IDEP), Appendix E. The Village analyzes the samples for some or all of the following parameters:

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Parameters	Found In	Potential Source(s)
<i>Escherichia coli</i>	Sewage	Human or Animal Waste
Surfactants	Soap, Emulsifiers	Industrial/Commercial/ Residential
Ammonia	Sewage, Fertilizers, Industrial Chemicals	Industrial/Residential/ Agricultural
Nitrates	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/Residential/Agricultural
Nitrites	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/ Residential/Agricultural
Conductivity	Industrial Waste, Sewage, Salt	Industrial/ Residential/ Agricultural
Total Dissolved Solids	Industrial Waste, Sewage, Salt	Industrial/Residential/ Agricultural
Temperature	Cooling Water, Sewage	Industrial/ Residential
pH	Acids and Bases	Industrial/ Residential

Indicator parameters (pH, temperature, ammonia, and detergents) will be utilized if the source is not identified during the field observation.

For source investigations outside of field screening, and complaints, the Village responds by site investigations. In addition, possible illicit discharges or connections may be identified by field staff while out in the field. Village staff visits the site to verify if follow-up source investigations or sampling is needed. If necessary, illicit discharges and connections are traced to their source and eliminated within 90 days of notification. The Village typically performs site investigations within 24 hours after receiving the complaint. The Village forwards complaints to the Macomb County Public Works Office (MCPWO). All complaints in this manner are recorded.

The Village will report any identified significant illicit discharges including those of untreated or partially treated sewage to the MDEQ within 24 hours after the discharge begins or is discovered and of corrective actions being taken to eliminate the connection/discharge. The reports will cover the information required by the NPDES Permit and Certificate of Coverage.

The Village will submit a biennial progress report to MDEQ summarizing the activities completed including illicit connections and discharges identified and corrected. For significant illicit discharges, the Village will list the pollutants of concern, the estimated load and volume discharged, and the locations of the discharge into the system and to the waters of the state.

For spills, Department of Public Works (DPW) staff visit the site and take a spill kit out to contain the spill and cover nearby catch basins. For larger spills and spills directly into waters of the state (oil sheens, etc.), DPW staff will contact the PEAS hotline. Detailed spill response information is provided at the end of the Storm Water Pollution Prevention Plan / Pollution Prevention Plan (SWPPP/PIPP), Appendix F.

18-19. IDEP Training and Evaluation - All Village field personnel (Public Works staff) receive IDEP training at least once per permit cycle. New hires are trained within the first year of their hire date. The Village has utilized both the county agencies and Hubbell, Roth & Clark, Inc. (HRC) for IDEP training. Training topics are: identifying illicit discharges or connections, and procedures for responding to and enforcement. HRC conducted a Good Housekeeping, Pollution Prevention, and IDEP training section for the Village DPW and WWTP staff on February 25, 2015. Village Staff was also present at a Good Housekeeping & IDEP training session put on by HRC and the City of Southfield

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on March 20, 2014. In addition, Village staff attended a Good Housekeeping & IDEP training put on by SEMCOG in September 2023.

The Village feels that dry-weather inspections, responding to complaints, and Village staff investigations are effective ways of implementing the IDEP.

Evaluation Methods

- Staff Training frequency
- Number of illicit discharges eliminated over the permit cycle
- IDEP Notification successes/failures
- Number of resident/business complaints received over the permit cycle
- Evaluation of program efficiency
- Changes in receiving water quality data over time

Evaluation methods will be re-evaluated biennially during the progress report submittal process.

20-26. Illicit Discharge Ordinance - The Village's Code of Ordinances (Appendix H) that prohibits non-storm water discharges are as follows.

Chapter 14: Environment – States that it is unlawful to permit sewage, excrement, garbage, or any other nuisance on a property that may affect the general health of the public.

Chapter 20: Land Divisions and Subdivisions, Division 4 – Street and Utility Improvement Requirements – Section 20-123, Item C(2)(e) calls for the adoption of the Macomb County design standards for stormwater management (*Procedures and Standards for Stormwater Management*). These standards prohibit illicit discharges to the storm sewer system.

Chapter 34: Solid Waste – Section 34-36 prohibit garbage to be disposed of in a manner which creates a nuisance or a menace to public health.

Chapter 44: Utilities, Division 2 – Sewer Use Regulations. Sections 44-163 and 44-164 requires that any structure that generates sewage be connected to a sewage management system, and prohibits the placement of garbage or sewage on public or private property or outlet any waste to a natural outlet.

Article 14-V: Municipal Separate Storm Sewer System Ordinance– This ordinance was adopted by the Village. It regulates the contribution of pollutants to the municipal separate storm sewer system by stormwater discharges by any user, prohibits illicit connections and discharges to the MS4, and establishes legal authority to carry out all inspection, surveillance, and monitoring procedures necessary to ensure compliance. **This ordinance was adopted in September 2015. This ordinance was updated and adopted in June 2022 to reflect adoption of Macomb County post-construction stormwater standards.**

The Municipal Separate Storm Sewer System Ordinance also outlines what non-stormwater discharges are exempt.

28-31. Construction Stormwater Runoff Control – Item C(2)(e) of Division 4 (Street and Utility Improvement Requirements) of Chapter 20 (Land Divisions and Subdivisions) adopts the Macomb County Public Works Offices Procedures and Design Standards for Stormwater Management. In addition, the Village of Romeo relies on the Macomb County Public Works Office to administer and enforce the SESC program within the Village's jurisdiction.

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The Construction Site Runoff Control Procedure is in Appendix G of this application

When a SESC complaint is received, the Village will contact the contractor, or the MCPWO/MDEQ as needed. The Village will notify MDEQ of a significant discharge into waters of the state.

All construction within the Village limits requires a building permit. If a site is within 500 feet of a waterway and/or one acre or more in size, then a SESC permit is to be submitted with the building permit application. Building permits are issued after the SESC or Notice of Coverage permit is provided. SESC, NOC, and other permit requirement information are relayed at all pre-construction meetings with the developers and landowners. NO building permits are issued until ALL SESC and NPDES (Permit By Rule) permits are issued through the appropriate agency.

32-33. Ordinance or Other Regulatory Mechanism – The Village currently adheres to the MCPWO Procedures and Design Standards for Stormwater Management as indicated in Section 20-123 Item C(2)(e). A current version of the standards is in Appendix I of this application. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

36-38. Water Quality Treatment Standard - The Village currently adheres to the MCPWO Procedures and Design Standards for Stormwater Management as indicated in Section 20-123 Item C(2)(e). A current version of the standards is in Appendix I of this application. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

39-40. Channel Protection Performance Standard - The Village currently adheres to the MCPWO Procedures and Design Standards for Stormwater Management as indicated in Section 20-123 Item C(2)(e). A current version of the standards is in Appendix I of this application. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

41-42. Site-Specific Requirements - The Village currently adheres to the MCPWO Procedures and Design Standards for Stormwater Management as indicated in Section 20-123 Item C(2)(e). A current version of the standards is in Appendix I of this application. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

43-52. Off-Site Mitigation and Payment in Lieu Programs – The Village of Romeo does not currently have an ordinance or regulatory mechanism that meets the optional requirements, as identified in questions 44-53. The Village will not be pursuing this option.

53-55. Site Plan Review – Section 20-123 Item C(2)(e) of the Village Ordinances adopts the Macomb County Public Works Office Design Standards for Stormwater Management. This document outlines the requirements, rules and design criteria for storm water management. This ordinance is located in Appendix H of this application with the latest version of the standards in Appendix I. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

The review process for Site Plans is located in Article VI of Chapter 46 of Village of Romeo Code of Ordinance, also located in in Appendix H.

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56-59. Long-Term Operation and Maintenance of BMPs – The Village currently adheres to the MCPWO Procedures and Design Standards for Stormwater Management as indicated in Section 20-123 Item C(2)(e). A current version of the standards is in Appendix I of this application. **The MCPWO revised these standards in May 2021 to meet the new permit requirements. The Village adopted the new standards in June 2022.**

60-62. Municipality Facility and Structural Storm Water Control Inventory - See Appendix J for the Municipal Inventory and Assessment, and Appendix G for the Structural Stormwater Controls Inspection and Maintenance Policy. The map included in the SWPPP/PIPP for the DPW Facility shows the location of the Detention Basin and vegetated swale for that property. The Storm Sewer Maps in Appendix C shows the location of the catch basins throughout the Village.

The Village owns the Village Hall and Police Station on W. St. Clair Street, the DPW Facility on Powell Road in Bruce Township, a cemetery in the southeast corner of the Village, and a park that is north of W. St. Clair Street and west of Main Street. A library also exists within the Village, but it is a district library that is not owner or operated by the Village of Romeo.

The maintenance facility at the DPW has interior floor drains that are connected to the OSDS on the property. The storm sewer system for this facility discharges to a vegetated swale which flows to a detention basin.

As new structural controls are added, removed, or no longer operated by the Village, the current inventory will be revised within 30 days of identification.

63-70. Facility-Specific Storm Water Management – The Village-owned facilities (shown in Appendix J – High/Medium/Low Priorities) were assessed during the application process. The following factors were considered during the assessment: 1) information currently identified in the Storm Water Pollution Prevention Initiative (SWPPI) – Appendix K; 2) SWPPP/PIPP – Appendix F; 3) amount of urban pollutants stored at the site; 4) identification of improperly stored materials; 5) the potential for polluting activities to be conducted outside; 6) proximity to water bodies; and 7) current housekeeping practices. The list will be revised within 30 days of determining a discharge from a new facility or when a major spill occurs at either of these facilities.

DPW vehicles and equipment are washed inside the Maintenance Building/Garage where the floor drains discharge to the on-site sewage disposal system. The Village police vehicles are washed at nearby car wash facilities.

Good Housekeeping – An environmental assessment was performed by Hubbell, Roth & Clark, Inc. in May 2010 and it was determined that a Storm Water Pollution Prevention Plan/Pollution Prevention Plan (SWPPP/PIPP) was needed for this site. The SWPPP/PIPP is located in Appendix F.

The outdoor materials are stockpiled inside a walled area. Salt is stored inside a three-wall building. Chemicals stored indoors are located on pallets or on shelving units. Vehicles and equipment and outdoor dumpsters are inspected regularly for leaks. Spill kits (oil dry) are located inside the buildings. Interior floor drains located inside the buildings are connected to the on-site sewage disposal system. Routine site inspections are performed at the facilities and recorded on inspection sheets. Comprehensive inspections are performed by a certified stormwater operator.

For medium to lower potential areas, regular street sweeping and catch basin cleaning are conducted eliminate sediment, debris, and other pollutants that may wash to the waters of the state.

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71-76. Structural Stormwater Control Operation and Maintenance Activities - All catch basins in the Village are located in the Storm Sewer Map, which is attached to this application in Appendix C.

Catch basin investigations and disposal of waste is per the Catch Basin Cleaning / Waste Disposal Standard Operating Procedure located in Appendix G.

The Village of Romeo currently cleans one-third of the Village-owned catch basins each year. Therefore, all catch basins are cleaned every three years. The waste is disposed of at the Village of Romeo Waste Water Treatment Plant. No catch basins are prioritized – all are given high priority. During investigations/cleaning, if some areas are identified as being severely clogged, these areas will then be put on the priority list for cleaning in the future.

Aboveground Storage Tanks – A diesel fuel tank is stored outside the DPW Garage for filling the vehicles. The tank is located approximately 60 feet from the nearest catch basin. The inspection of the tank is part of the routine (monthly) and comprehensive inspections at the facility.

77-81. Municipal Operations and Maintenance Activities - The Village does not own or maintain any bridges or unpaved roads. Potential pollutants from operations and maintenance activities include: sediment from parking lots and catch basins, salt utilized on parking lots and sidewalks, and fluids from vehicles and equipment.

The Village sweeps the downtown area and 1 of 4 Village Quadrants weekly. Therefore, the downtown is swept every week and the rest of the Village every month. Street sweeping waste is dried at the Village or Romeo Wastewater Treatment Plant, and then taken to a landfill for disposal.

The Village considers increasing sweeping frequency based on factors such as traffic volume, land use, field observations of sediment and trash accumulation, proximity to water courses, etc. The Street and Parking Lot Maintenance SOP and the Salt Application and Storage SOP are located in Appendix G of this application.

82. Managing Vegetated Properties – The Village of Romeo does not apply fertilizer, herbicide, or pesticide to municipal properties. Mowing of Village property is performed by the Village DPW.

83. Contractor Requirements and Oversight – Fertilizers, herbicides, and pesticides are not used on municipal property. Municipal property is mowed by an outside contractor. DPW staff inspects that work that the contractor performs for quality of work and to verify that they follow all specified water quality BMP's. See the 'Contractor Requirements SOP' in Appendix G for more details. If additional contractors are used in the future, this SOP will be updated.

84. Employee Training - All Village field personnel (Public Works staff) receive Good Housekeeping/Pollution Prevention training at least once per permit cycle. New hires are trained within the first year of their hire date. The Village has utilized county agencies and Hubbell, Roth & Clark, Inc. (HRC) for training opportunities. HRC conducted a Good Housekeeping, Pollution Prevention, and IDEP training session for the Village DPW and WWTP staff on February 25, 2015. Village Staff was also present at a Good Housekeeping & IDEP training session put on by HRC and the City of Southfield on March 20, 2014. In addition, Village staff attended a Good Housekeeping & IDEP training by SEMCOG in September 2023.

Employee training is described in Task 3.1 of the IDEP (Appendix E) and Section 5.6 of the SWPPP/PIPP (Appendix F).

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85-88. Total Maximum Daily Load (TMDL) Implementation Plan – TMDL's currently exist for E.coli for East Pond Creek, which flows through Romeo, and the Clinton River. However, Romeo does not discharge directly to the Clinton River. The USEPA TMDL for East Pond Creek indicates that the primary pathogen sources for East Pond Creek include agricultural inputs, failing septic systems, and urban runoff. Per the Southeast Michigan Council of Governments (SEMCOG) 2008 Land Use Profile for the Village of Romeo, no agricultural land exists within the municipality. In addition, the Village is not aware of any on-site sewage disposal systems (septic systems) within the Village other than the one at the Public Works Facility located in Bruce Township.

The Village plans to implement the following BMP's during the permit cycle to make progress toward achieving the pollutant load reduction requirement.

1. Conduct dry-weather IDEP inspections at each Village of Romeo outfall. Water samples, testing for E.coli, will be taken at any outfall that shows dry-weather flow.
2. Conduct public education for residents and business regarding urban runoff to the East Pond Creek. The public education topics will consist of picking up pet waste, maintaining buffers along the edge of water bodies, and maintenance of septic systems (if there are any in the Village).
3. Village streets and parking lots are swept regularly. The downtown area and one of four Village quadrants is swept weekly. Therefore, all areas outside of the downtown are swept at least once per month. Street sweepings, which may contain animal excrement is disposed of properly.
4. Storm sewer catch basins are cleaned regularly and any removed material is disposed of properly.
5. The Village plans to support the monitoring conducted by Macomb County and the Clinton River Watershed Council.
6. The Village plans to support the monthly monitoring conducted by Macomb County Health Department for site 52. See monitoring map, Appendix M.
7. Conduct wet-weather sampling for E.coli and dissolved oxygen on 2 city outfalls (40 and 50) in years 2 and 4 of permit cycle. Wet weather samples will be collected within 30 to 60 minutes of the start of a wet weather event. A wet weather event is defined as a precipitation event that produces at least 0.25' of rain over a 24-hour period.
8. Outfalls 40 and 50 are included in the Storm Water Outfall map included in IDEP. Results from these tests will allow Village to create data used to reduce TMDL for the Clinton River and East Pond Creek.