

Aug 2, 2019 Response to EGLE Comments

Outfall and Point of Discharge Information

Please indicate which of the (48) outfalls are owned or operated by the City and provide the exact number. Some are listed as private but the total number of City outfalls is not clear. In addition, the surface water of the state that each outfall discharges to was not provided. It is generally assumed that most, if not all, discharge to the Lower Rouge. Please address.

1. Out of the 48 outfalls, 23 are city owned. They are outfall # 1,2,3,4,6,8,12,14,15,16,17,18,19,20,21,22,23,24,25,37,42,46, and 48.
2. All outfalls discharge into the Lower Rouge River.

Enforcement Response Procedure (ERP) (Section 5)

The updated ERP provided does not include the ordinance that the City will be utilizing to implement their Post-Construction program. Only Part 91 and IDEP are addressed. Please include.

The City has updated the ERP to include a reference that it will review and consider Wayne County's updated storm water standards when it becomes available.

Public Participation/Involvement Program (PPP) (Section 5)

Please include in the PPP the name and contact information of the person(s) at the City that the public can submit comments to on the City's SWMP.

The contact information was added to the PPP.

Public Education Program (PEP) (Section 6)

Activities 1 and 2 include language such as "may also educate", "may also promote", "materials may inform and educate", "may also include", "may include". Please list what materials will be used and what be done as part of these activities. Words such as "may" are non-committal and must be removed. For example, please replace "may" with "will".

The City plans to cover all of the topics listed in Section B of the PEP using one of the methods described. The word "may" was used because the City will decide which education method is used for each topic. For instance, the City will write 2 newsletter articles per year but may not cover all of the topics. Topics not included in written newsletters may be covered with pamphlets, etc. The language used in Dearborn's PEP is similar to that used in the ARC's approved PEP.

Will any educational information be directly sent or given to the commercial, industrial, and institutional entities from the City? If not, please provide a delivery mechanism that will get information directly to them rather than having them take the initiative to seek out this information on their own.

The City will make educational information available to commercial, industrial, and institutional entities within the City via brochures, newsletters, its website, and/or displays. The City does not plan to directly mail educational materials.

It is not clear how tracking web site hits or the number of literature pieces distributed to target audiences will enable the City to assess change in public awareness and behavior. Consider conducting surveys in order to assess change in public awareness and behavior.

It is the City's understanding that the evaluation of the overall effectiveness of the PEP may be an accumulation of the measure of the effectiveness of the individual actions/delivery mechanisms, a measure of the effectiveness of all of the actions through a survey, or a combination of both. Because the City is not working collaboratively with a watershed group, it is cost prohibitive to conduct a proper and reliable survey. Therefore, the City will rely on an accumulation of the measure of the effectiveness of the individual actions. While not specific to Dearborn's PEP, examples include:

Measure the usage of facilities or materials:

Count and compare the numbers of something or actions over a predetermined period of time (success could be shown by an increase or decrease, depending on the desired action). Following are some examples:

- Materials collected or visitors at household hazardous waste or recyclable collection centers (success can be shown by quantifying an increase in waste and recyclable collections, specifically after an education effort)
- The number of stores stocking low/no phosphorus fertilizer
- The sales of low/no phosphorus fertilizer
- Calls to report problems or to solicit information
- People composting or purchasing compost bins
- Charity car washes that eliminate discharges
- People using travel trailer sanitary waste disposal facilities
- Requests for educational materials

Participation:

- Increased or sustained attendance at meetings, workshops, or events
- Increased or sustained number of partners that support meetings, workshops, or events
- Increased or sustained number of volunteers for pollution reduction projects
- Increased or sustained number of septage haulers that accept coupons for pumpout service, and track their change in business volume
- Pledge cards from residents pledging to take action to protect our water resources
- Attention given to the issue by the media (e.g editorials, articles, interviews, PSAs)
- Website hits. We suggest the use of embedded counters within the website. These can be used to economically measure whether there is continued interest in public education materials. However, they may not be reflective of the amount of information that is truly being pushed, as the same person may click on a website multiple times.
- The use of downloadable coupons from a community's website.
- Brochures can direct responders to surveys within the website. This can give an indication the effectiveness of the brochure to encourage the public to find more information.

Illicit Discharge Elimination Program (IDEP) (Section 7)

Question (17)

Please provide a schedule to pursue enforcement actions.

A document called "IDEP ' Corrective Action Notification" has been uploaded in MiWaters.

Illicit Discharge Elimination Program (IDEP) Ordinance/Regulatory Authority

Ordinance No. 18-1630 is not the draft Illicit Discharge Elimination Ordinance that was provided with the original application that I determined met the permit application requirements and could be

adopted. Why was Ordinance No. 18-1630 adopted and not the other one? The language under Section 8 of this ordinance does not adequately address questions 21 and 22 of the permit application.

- Section 8.1 (2) of the ordinance excludes prohibiting firefighting discharges to the City's MS4.
- Section 8.1 (1) of the ordinance excludes prohibiting: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water.

Post Construction Controls (PCC) Ordinance / Regulatory Authority (Section 9)

Please indicate on the City's application that the City intends to review the Wayne County stormwater ordinance and determine whether to adopt. In addition, the application states that post-construction storm water runoff procedures will be in place by December 31, 2018. Please change to state "once the Wayne County ordinance is approved and reviewed by the City".

This has been reflected in the City's application (31) and (32).

Pollution Prevention and Good Housekeeping Program (Section 10)

Question (71)

The Pollution Prevention and Good Housekeeping General Procedures SOP states that "if it is determined that the catch basin sump is 50% full of accumulated sediment and debris, it will be cleaned promptly". This is fine. However, please explain how inspecting the medium and low priority catch basins once per permit cycle, or on an as-needed basis, is often enough to ensure that the sediment in the catch basin sumps don't fill up past the 50% level before then City can inspect them. Please either provide justification, or include an increased catch basin inspection frequency.

Much of the City's MS4 system was previously a combined system. There are bell traps on the outlet pipe from the catch basin to the main sewer line. Once that outlet becomes covered with debris, it becomes obvious that the catch basin needs to be cleaned.

In addition, the City currently installs mosquito larvae briquettes in its catch basins on a yearly basis. If an employee notices any problems at this time, the catch basin is added to a list for cleaning.

Questions (78-80)

The City's response indicates that the City currently performs sweeping of its streets and parking lots on a routine basis but is unwilling to commit to a minimum sweeping frequency. This is not an acceptable response. Please address questions 78-80.

The City will commit to performing sweeping of its streets and parking lots on a frequency of once per year. The Pollution Prevention and Good Housekeeping General Procedures SOP has been updated to reflect this.

Total Maximum Daily Load (TMDL) Implementation Plan

Questions (85-88)

Please add more than the (5) proposed monitoring sites located throughout the City of Dearborn, or provide justification as to why these 5 sites provides adequate representation of the City's MS4. The TMDL document says (see attached map – insert map) but no map is attached to the document. Is there a map that was supposed to be part of it?

The 5 proposed sites represent over 20 percent of the total City-owned storm water outfalls. The sites were chosen based on three qualifications: access during wet weather, representative sampling across the City, and location above the river (to eliminate any contamination of sample from the Rouge River during sampling).

The map had been uploaded as a separate document in MiWaters.

For sampling wet-weather events, samples must be collected within 30-60 minutes of the storm event in order to capture the first flush. Within the rising period of the flow hydrograph or within 6 hours of the peak storm flow is not acceptable.

The TMDL document has been updated to reflect the suggested change.