

TMDL IMPLEMENTATION PLAN CITY OF DEARBORN

PREPARED FOR:

THE CITY OF DEARBORN
16901 MICHIGAN AVE, DEARBORN, MI 48126



JULY 2019

SECTION A – INTRODUCTION

This plan is intended to meet the TMDL elements of the permit application: questions 85 – 88. These requirements are as follows:

- Provide a procedure for identifying and prioritizing BMPs to reduce the TMDL pollutants,
- Provide a list of BMPs that will be implemented to reduce the TMDL pollutants, and
- Provide a monitoring plan to assess the effectiveness of the BMPs.

The U.S. Environmental Protection Agency (EPA) requires a TMDL Assessment for waterbodies identified on the state’s impaired waters list. The EPA has approved two TMDL Assessments that apply to the entire Rouge River watershed as listed below.

- *Escherichia coli* (*E. coli*) (MDEQ, 2007a)
- Biota (MDEQ, 2007b)

This plan will address each of these parameters within the limits of the MS4 permit. As such, this should not be considered an implementation plan to address all sources, only those under the authority of the MS4 permit.

SECTION B – PRIORITIZATION AND IMPLEMENTATION OF BMPS

The Best Management Practices (BMPs) contained in the attached table includes the Storm Water Management Plan (SWMP) actions that will be implemented during the permit cycle to make progress toward achieving each of the TMDL pollutant load reduction targets. The table of BMPs identifies the targeted TMDL pollutants (i.e. sediment or bacteria). BMPs were classified as high (H), medium (M) or low (L) priority for each TMDL based on their likelihood of reducing the target pollutant (see attachment). This process will be reviewed and updated, if necessary, within 90 days of the end of the permit term. The review will be based on the results of monitoring data and possibly other measurables. Those BMPs with a medium or high potential to reduce either sediment or *E. Coli* were included as part of the plan and listed in the table below.

Section	SWMP Action	Biota (sediment)	Bacteria (<i>E. coli</i>)
PEP	Distribute pollution prevention literature on various topics through brochures, educational materials, and other media	x	x
PEP	Coordinate and distribute community articles and ad graphics on pollution prevention and watershed restoration and stewardship	x	x
PEP	Provide displays for community venues and outreach activities at events	x	x
PEP	Promote county-wide complaint tracking and response system		x
PEP	Promote water resource protection workshops	x	x
IDEP	Dry weather outfall inspections		x

IDEP	County-based illicit discharge elimination investigations		X
IDEP	Illegal Dumping/Illicit discharge investigations during routine field work		X
IDEP	Minimize Infiltration of seepage from sanitary sewers		X
IDEP	Investigation of Potential Illicit discharges		X
IDEP	Performance tracking of IDEP activities		X
IDEP	IDEP training for staff		X
IDEP	Maintain updated map of outfalls		X
SESC	SESC Program	X	
PCSC	Require Post-construction storm water runoff control	X	
P2GH	Follow SOP for high potential municipal facilities as listed in the SWMP	X	
P2GH	Catch basin cleaning	X	
P2GH	Employee training	X	X

SECTION C – MONITORING

Sampling will occur at 5 monitoring sites located throughout the City of Dearborn (see attached map). These sites will be sampled using manual sampling techniques for *E. coli* and Total Suspended Solids (TSS).

City of Dearborn municipal employees will collect grab samples at the designated monitoring sites. Samples will be analyzed for *E. coli* and TSS. Samples will be collected during years 2 and 4 of the permit cycle during wet weather events from May through September. A wet weather event is categorized by 0.25 inches of precipitation occur over a 24 hour period. For these wet-weather events, samples will be collected within 30-60 minutes of the storm event.

Samples will be analyzed for *E. coli* and TSS concentrations by a certified lab. The City will follow a sampling protocol so that samples are properly taken and transferred to the lab.

Insert Map (uploaded in MiWaters)

Prioritization of BMPs

Section	SWMP Action	Biota (sediment)	Bacteria (E. coli)
PEP	Distribute pollution prevention literature on various topics through brochures, educational materials, and other media	M	M
PEP	Coordinate and distribute community articles and ad graphics on pollution prevention and watershed restoration and stewardship	M	M
PEP	Provide displays for community venues and outreach activities at events	M	M
PEP	Promote county-wide complaint tracking and response system	L	H
PEP	Promote water resource protection workshops	M	M
PEP	Promote county household hazardous waste reduction program	L	L
PEP	Promote and support volunteer activities	L	L
IDEP	Dry weather outfall inspections	L	M
IDEP	County-based illicit discharge elimination investigations	L	H
IDEP	Inspection of City-owned facilities	L	L
IDEP	Illegal Dumping/Illicit discharge investigations during routine field work	L	H
IDEP	Minimize Infiltration of seepage from sanitary sewers	L	H
IDEP	Investigation of Potential Illicit discharges	L	H
IDEP	Performance tracking of IDEP activities	L	M
IDEP	IDEP training for staff	L	H
IDEP	Maintain updated map of outfalls	L	H
SESC	SESC Program	H	L
PCSC	Require Post-construction storm water runoff control	H	L
P2GH	Municipal facility inventory	L	L
P2GH	Follow SOP for high potential municipal facilities as listed in the SWMP	M	L
P2GH	Catch basin cleaning	H	L
P2GH	Employee training	M	M