

**OAKLAND COUNTY MS4
Water Resources Commissioner's Office (WRC)
Municipal Operations and Maintenance Activities Assessment
MARCH 2023**

I. POLICY:

The purpose of this policy is to establish the procedure for assessing the potential for pollutants from operation and maintenance activities at WRC-owned or operated facilities or on systems owned or operated by WRC that discharge to surface waters of the state.

II. BACKGROUND:

The EGLE NPDES Phase II Stormwater Discharge Permit requires a procedure for identifying operation and maintenance activities that have the potential to discharge pollutants to surface waters of the state. The assessment shall identify all pollutants that could be discharged from each applicable operation and maintenance activity and the BMPs being implemented or to be implemented to prevent or reduce pollutant runoff.

III. OPERATION AND MAINTENANCE ACTIVITIES ASSESSMENT:

The operation and maintenance activities that are conducted at or within WRC facilities and Drainage Districts with a discharge of stormwater to surface waters of the state have been evaluated for the potential to discharge pollutants such as:

- sediment,
- nutrients,
- metals,
- hydrocarbons,
- pesticides,
- chlorides,
- trash,
- bacteria, or
- other site-specific pollutants that could be discharged from those activities are identified.

The BMPs that are implemented to reduce pollutant runoff for each operation and maintenance activity are identified in the table below.

WRC Operation and Maintenance Activity	Potential Pollutants that could be Discharged	BMP's Implemented to Reduce Pollutant Runoff
Catch Basin and Manufactured Treatment Device Cleaning	<ul style="list-style-type: none"> • Sediment • Nutrients • Metals • Hydrocarbons • Trash • Bacteria 	<ul style="list-style-type: none"> • All vactored wastes are hauled to the drying bed at the Oakland Ave Septage Unloading facility where they are dewatered and then hauled away for proper disposal to a licensed landfill (per P-037 and CDM-0405).
Ditch, Detention/Retention Pond and Sediment Basin Maintenance	<ul style="list-style-type: none"> • Sediment • Nutrients • Metals • Hydrocarbons • Trash • Bacteria 	<ul style="list-style-type: none"> • Small amounts of sediment removed are typically placed on the surrounding banks and graded out. Maintenance staff ensures that the area is stabilized and will not contribute soil erosion and sedimentation back into the system. • Larger quantities of removed material that cannot be utilized onsite is hauled away by a licensed contractor to a licensed landfill.
Water Main Rehab/Replacement	<ul style="list-style-type: none"> • Sediment 	<ul style="list-style-type: none"> • Spoils from water main replacement are taken to the material storage yard at 522 S. Opdyke (Water Maintenance Building) in Pontiac where they are stored prior to being hauled away to a licensed landfill. A SWPPP is in place at the Water Maintenance Building and documents soil erosion and sedimentation control BMPs. • Spoils not taken to the Water Maintenance Building are hauled away and properly disposed of at a licensed landfill by a licensed contractor.
Sanitary Sewer Rehab/Replacement	<ul style="list-style-type: none"> • Sediment • Bacteria 	<ul style="list-style-type: none"> • Sewer lines are inspected on a schedule and repaired or cleaned via jetting as necessary to prevent sewer backups and SSO's. • Spoils from sanitary sewer rehab/replacement are hauled away and properly disposed of at a licensed landfill by a licensed contractor.
Vehicle Washing and Maintenance (Vactor trucks, truck fleet, televising trucks, etc.)	<ul style="list-style-type: none"> • Sediment • Nutrients • Metals • Hydrocarbons • Trash • Bacteria 	<ul style="list-style-type: none"> • Regular vehicles (pickup trucks/cars) are washed and maintained at either a commercial carwash or taken to Central Garage in Waterford for proper maintenance (oil changes, etc.) which takes place indoors. • Vactor trucks and other larger trucks are washed inside the Public Works building where the wash water discharges to an interior floor drain that discharges to the sanitary sewer system.

This assessment will be updated/revised within 30 days following the addition/removal of BMPs to address new and existing operation and maintenance activities.