

<p>OAKLAND COUNTY MS4 Oakland County Parks and Recreation Commission (OCPRC) Municipal Operations and Maintenance Activities Assessment MAY 2021</p>
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I. POLICY:

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

II. BACKGROUND:

The EGLE NPDES Phase II Stormwater Discharge Permit Application 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. (Stormwater Permit Application Item No. 77).

III. OPERATION AND MAINTENANCE ACTIVITIES ASSESSMENT:

The operation and maintenance activities that are conducted at or within OCPRC facilities and 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.

OCPRC 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"> • WRC or contractor is contracted to clean structures as needed. All vactored wastes are properly disposed of.
Roadway and Bridge Maintenance	<ul style="list-style-type: none"> • Sediment • Metals • Hydrocarbons • Trash 	<ul style="list-style-type: none"> • Catch Basin Cleaning • Perform concrete, patching, resurfacing and surface sealing work in dry weather • Stockpile materials away from storm drain inlets and catch basins • Use of erosion cloth in catch basins during construction • Adherence to WRC SESC permitting for any project involving >1 acre of soil disturbance
Right-of-Way Maintenance (trash pickup, etc.)	<ul style="list-style-type: none"> • Sediment • Nutrients • Metals • Hydrocarbons • Chlorides • Trash • Bacteria 	<ul style="list-style-type: none"> • Road ROWs associated with internal park roads are monitored for structural issues weekly. • Trash cleanup is performed weekly
Unpaved Road and Trail Maintenance	<ul style="list-style-type: none"> • Sediment • Brine (chlorides) 	<ul style="list-style-type: none"> • Best design practices for trails where possible; slopes that do not exceed 5% slope • Minimal dirt surfaces – most internal park roads are paved; trails are mowed grass or aggregate • Stabilize exposed soils, especially near steep slopes, to prevent erosion • Minimal use of brine for dust control 4x/ yr at select locations
Cold weather Operations: -Plowing -Sanding -Salt Application -Snow Pile Disposal	<ul style="list-style-type: none"> • Sediment • Metals • Hydrocarbons • Chlorides 	<ul style="list-style-type: none"> • Plowing at some OCPR facilities is contracted to OCFM; the remainder is performed in-house by OCPR staff • Routinely calibrate spreaders • Minimize the use of salt and/or sand to the maximum extent practicable • Salt storage below Part V threshold volumes. • Snow piles stored away from storm drains where possible.

OCPRC Operation and Maintenance Activity	Potential Pollutants that could be Discharged	BMP's Implemented to Reduce Pollutant Runoff
Vehicle and Equipment Washing and Maintenance (i.e. truck fleet, televising trucks, etc.)	<ul style="list-style-type: none"> • Sediment • Nutrients • Metals • Hydrocarbons • Chlorides • Trash • Bacteria 	<ul style="list-style-type: none"> • Trucks and vehicles are taken to a commercial carwash or cleaned indoors where wash water discharges to the sanitary sewer system • Minimal outdoor water pressure-washing of vehicles at some Park Maintenance yards; performed where wash water infiltrates to gravel or turf • Portable power washing activities will not include the use of additives
Landscape Maintenance	<ul style="list-style-type: none"> • Sediment • Nutrients • Trash 	<ul style="list-style-type: none"> • Implement Integrated Pest Management (IPM) program; maintain staff certifications as Certified Pesticide Applicators <ul style="list-style-type: none"> ○ If contractors are used for pesticide applications, the Oakland County procurement process requires contractors to be certified pesticide applicators through MDARD. • Retain certification in Michigan Turfgrass Environmental Stewardship Program (MTESP) • Use of native plants and rain gardens to improve water quality and create habitat • Manage invasive plant species to improve water quality and wildlife habitat • Utilize Phosphorus-free fertilizers and maintain no-mow and fertilizer-free buffer zones adjacent to waterways • Ensure grass clippings are blown from roadways and curb and gutter areas • Maintenance of no mow zones and buffer areas around water features • Maintenance of 14 stormwater swales throughout the park 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.