Muskegon Community College

Municipal Separate Storm Sewer System (MS4) Program

.

Standard Operating Procedure (SOP)

Completed on this Date:

August 28, 2025

Revision Completed on this Date:

N/A

Storm Water Program minimum task quick reference

- ✓ Complete good housekeeping and routine maintenance activities and inspections per the frequency listed in the SOP.
- ✓ Complete semiannual comprehensive site inspections.
- ✓ Complete pollution prevention/good housekeeping training at least once per permit cycle for existing employees and within the first year of hire for new employees.
- ✓ Review the SOP per the frequency specified in the Storm Water Management Plan (SWMP).
- ✓ Revise the SOP when there has been a change in operations or personnel.
- ✓ Submit non-compliance and spill/release reports as required by the permit.
- ✓ Maintain storm water program records for a minimum of three years.

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SECTION 1 - FACILITY INFORMATION

Facility Information:

- Name of Facility: Muskegon Community College
- Facility Addresses: Main Campus 221 S. Quarterline Rd, Muskegon MI 49456
  Golf Course 2100 Marquette Ave, Muskegon, MI 49442
  Sturrus Technology Center 388 W Clay Ave, Muskegon, MI 49442
- County: Muskegon

Facility Contact Information:

- Facility Contact: Brian Houts
- Title: Director Physical Plant
- Telephone: 231-777-0233
- Email Address: brian.houts@muskegoncc.edu
- Mailing Address: 221 S. Quarterline Rd, Muskegon MI 49456

Permit Information:

- Individual Permit Number: **N/A** - New Permit Submission
- Individual Permit Effective Date of Coverage: **N/A** - Currently
- Receiving Waters: 4 Mile Creek, Muskegon MI

Muskegon Community College - Municipal Activity Summary

Purpose

This document summarizes municipal activities conducted at Muskegon Community College (MCC) that support compliance with the Municipal Separate Storm Sewer System (MS4) Stormwater Permit Program.

Facilities and Grounds Maintenance

- Parking lots are swept regularly to remove sediment, litter, and deicing residue.
- Storm drains, catch basins, and culverts are inspected and cleaned to ensure proper function.
- Leaves and organic debris are collected during the fall season to minimize nutrient loading.
- Landscaping practices include use of native vegetation and buffer strips to slow runoff and improve infiltration.

Snow and Ice Management

- Deicing materials are stored in covered and contained areas to prevent runoff.
- Application practices are calibrated to minimize overuse of salt and sand.
- Grounds and facilities staff are trained in best practices for winter maintenance and alternatives to excessive chloride use.

Chemical and Waste Handling

- Fuels, oils, fertilizers, pesticides, and cleaning products are stored in secure, covered areas.

- Spill prevention and response procedures are in place and reviewed with staff.
- Regular inspections are conducted of chemical storage, waste containers, and maintenance facilities.

Construction and Renovation Projects

- Erosion and sediment controls (silt fencing, inlet protection, stabilized construction entrances) are required on all campus construction sites.
- Contractors are required to comply with MCC stormwater protection standards and applicable state requirements.
- Post-construction stormwater controls (such as detention basins) are incorporated into projects where feasible.

Vehicle and Equipment Operations

- Vehicle and equipment maintenance is performed in designated areas with proper fluid containment.
- Vehicle wash water is managed to prevent discharge into the storm drain system.
- Fluids (oil, fuel, antifreeze) are disposed of properly through licensed vendors.

Education and Outreach

- Storm drain inlets on campus are marked with signage: “No Dumping – Drains to Lake Michigan.”
- Staff receive training on stormwater pollution prevention practices.
- Stormwater best practices and sustainability efforts are promoted through MCC media platforms and internal communications.

Inspections and Documentation

- Routine inspections of stormwater infrastructure are performed and logged.
- Records are maintained for street sweeping, catch basin cleaning, and salt application.
- Training sessions and outreach activities are documented annually.
- Reports are prepared and submitted in accordance with MS4 permit requirements.

SECTION 2 – STORM WATER POLLUTION PREVENTION TEAM MEMBERS

The storm water pollution prevention team is responsible for developing, implementing, maintaining, and revising this SOP. The members of the team and their primary responsibilities (i.e. implementing, maintaining, record keeping, submitting reports, conducting inspections, employee training, conducting a review of the SOP) are as follows:

Storm Water Program Team Members and Responsibilities:

Name and Title	***Responsibility***
Brian Houts Director Physical Plant	Develop, implement, and update the Stormwater Pollution Prevention Plan; Monitor construction activities for compliance with stormwater BMPs; Promote stormwater awareness and public education through campus outreach; Submit compliance reports and maintain communication with regulatory agencies as required
Brendan Grey Asst. Director Physical Plant	Conduct routine inspections of stormwater controls and infrastructure; Maintain records of training, inspections, and maintenance activities.
Safety and Security Manager, TBD	Ensure proper handling and storage of chemicals, fuels, and waste materials; Oversee spill response planning and corrective actions; Provide staff training on stormwater pollution prevention practices
Beth Dick, CFO	Institutional support and resource allocation
Troy Jones, Grounds Team Lead	Oversees landscaping, mowing, leaf collection, salt application, and snow removal practices
Fluarry Jackson, Custodial Team Lead	Oversees outdoor waste handling, dumpsters, and chemical storage

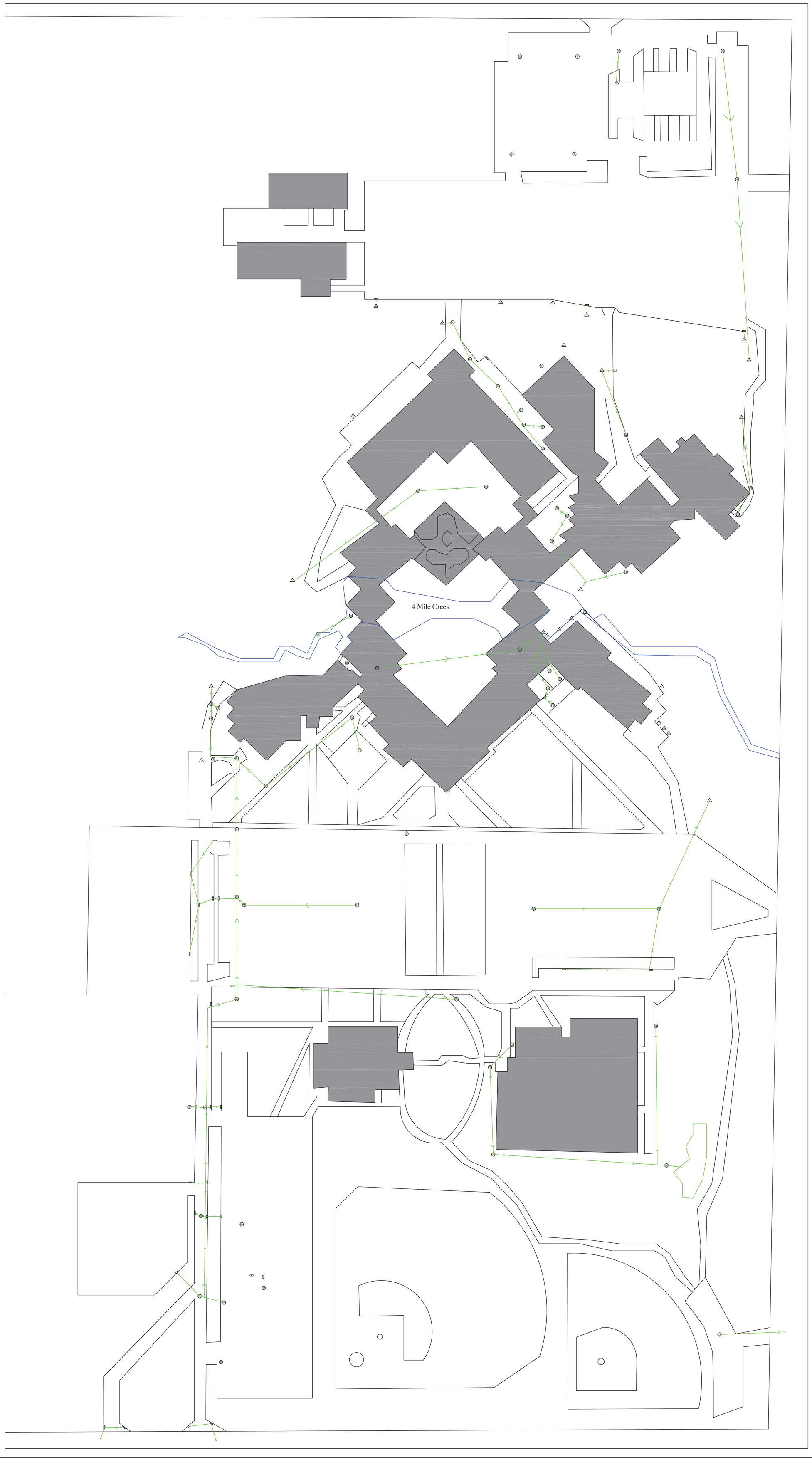
SECTION 3 – SITE MAP

To identify potential sources of significant materials that have reasonable potential to pollute storm water and subsequently be discharged to surface waters of the state, it is recommended that the SOP contain a site map.

Site Map

The following items are recommended to be included in the facility's site map as applicable:

1) Buildings and other permanent structures.
2) All outdoor areas of public works activity, public works equipment, and/or public works material storage.
3) Storage, disposal, and/or recycling areas for significant materials.
4) The location of all storm water discharge points (numbered or otherwise uniquely labeled for reference).
5) The storm sewer system contributing to each storm water discharge point, including the direction of flow.
6) All structural controls (e.g., secondary containment, inlet filters, etc.) and/or storm water treatment equipment/devices.
7) Name and location of receiving water(s).



Muskegon Community College MS4 Overall

Key	
Dischargees(Catchbasins)	
Manholes	
Discharge	
Roof/foundation/floor	
Pipes and Flows	
Leach Basin	
Fuel Storage	
Dumpsters	
Spill Kit	
Out Falls	

N

MCC-064

18" storm

MCC-021

MCC-020

MCC-019

18" Clay

MCC-046

MCC-050

MCC-049

MCC-111

MCC-048

MCC-047

12" concrete

MCC-045

12" concrete

12" concrete

MCC-044

12" concrete

MCC-043

MCC-042

MCC-041

15" RCP

MCC-001

MCC-018

10" RCP

10" RCP

MCC-017

MCC-016

MCC-015

MCC-014

MCC-013

15" RCP

12" RCP

MCC-014

MCC-011

MCC-012

MCC-052

15" RCP

MCC-008

12" RCP

12" RCP

MCC-007

MCC-006

MCC-004

10" RCP

MCC-002

MCC-003

10" RCP

MCC-005

Muskegon Community College - South


Muskegon Community College - Middle
Key
Dischargees(Catchbasins)
Manholes
Outfalls
Roof/foundation/floor
Pipes and Flows
Leach Basin
Fuel Storage
Dumpsters
Spill Kit
Outfalls
N
4 Mile Creek
Foundation Drain
Roof/Floor Drain
Roof/Floor Drain
8" Storm
8" Storm
8" Storm
8" Storm
8" Storm
8" Storm
8" Storm
Curb cut
Curb cut
Curb cut
Curb cut
Curb cut
Curb cut
Curb cut
36" Concrete Headwall
36" Concrete
36" HDPE
12" HDPE
12" HDPE
28"Storm
27"Storm
18"Storm
18"Storm
18"Storm
15" Storm
12" RCP
12" RCP
12" RCP
12" RCP
12" RCP
12" clay
12" Clay
12" Concrete
12" Concrete
leach basin
MCC-005
MCC-005
MCC-005
MCC-005
MCC-005
MCC-005
MCC-019
MCC-020
MCC-021
MCC-022
MCC-023
MCC-024
MCC-025
MCC-026
MCC-027
MCC-028
MCC-029
MCC-030
MCC-031
MCC-032
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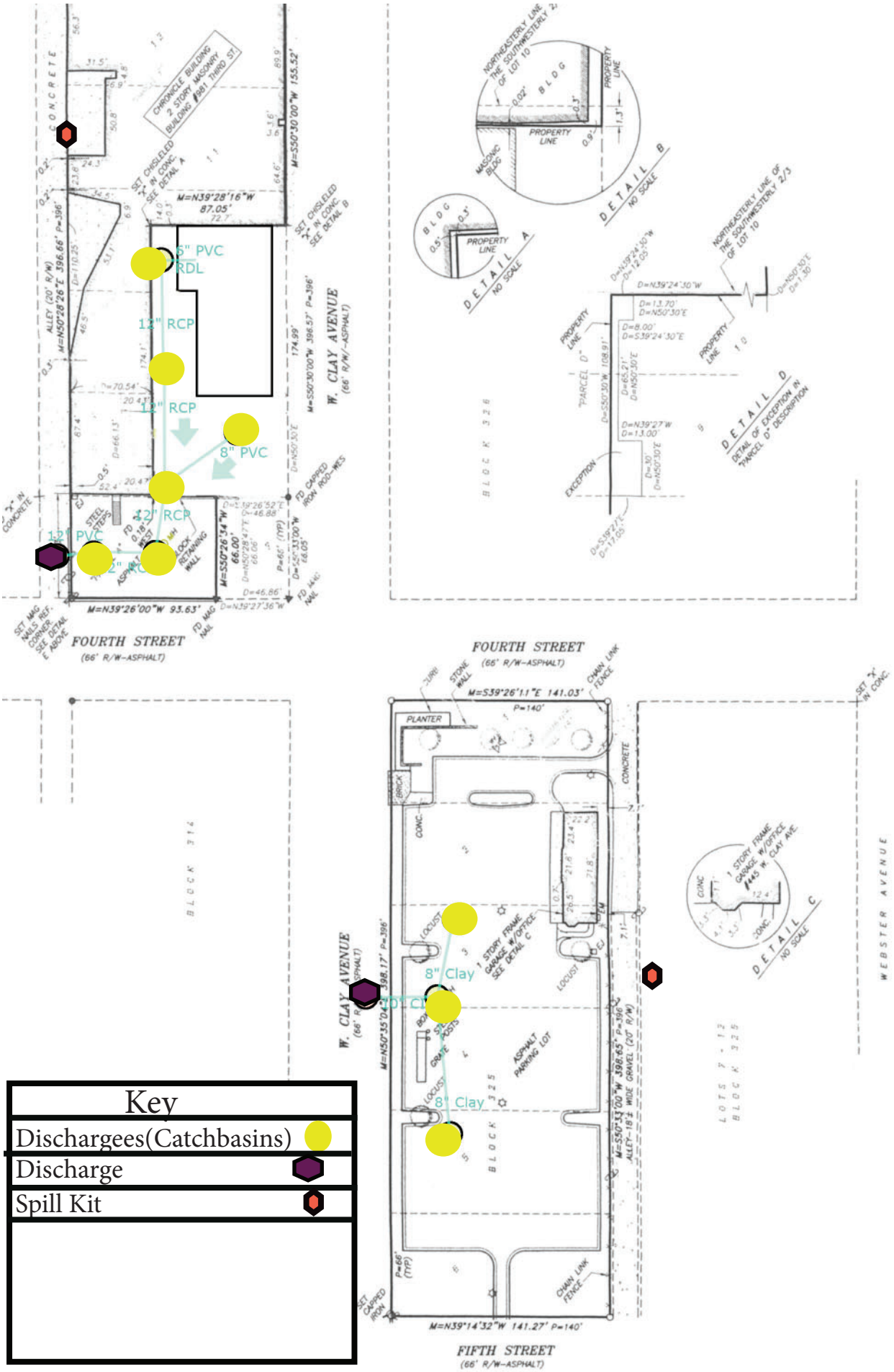
MCC-058
MCC-059
MCC-060
MCC-061
MCC-063
MCC-064
MCC-065
MCC-066
MCC-067
MCC-068
MCC-107
MCC-110

Muskegon Community College - North

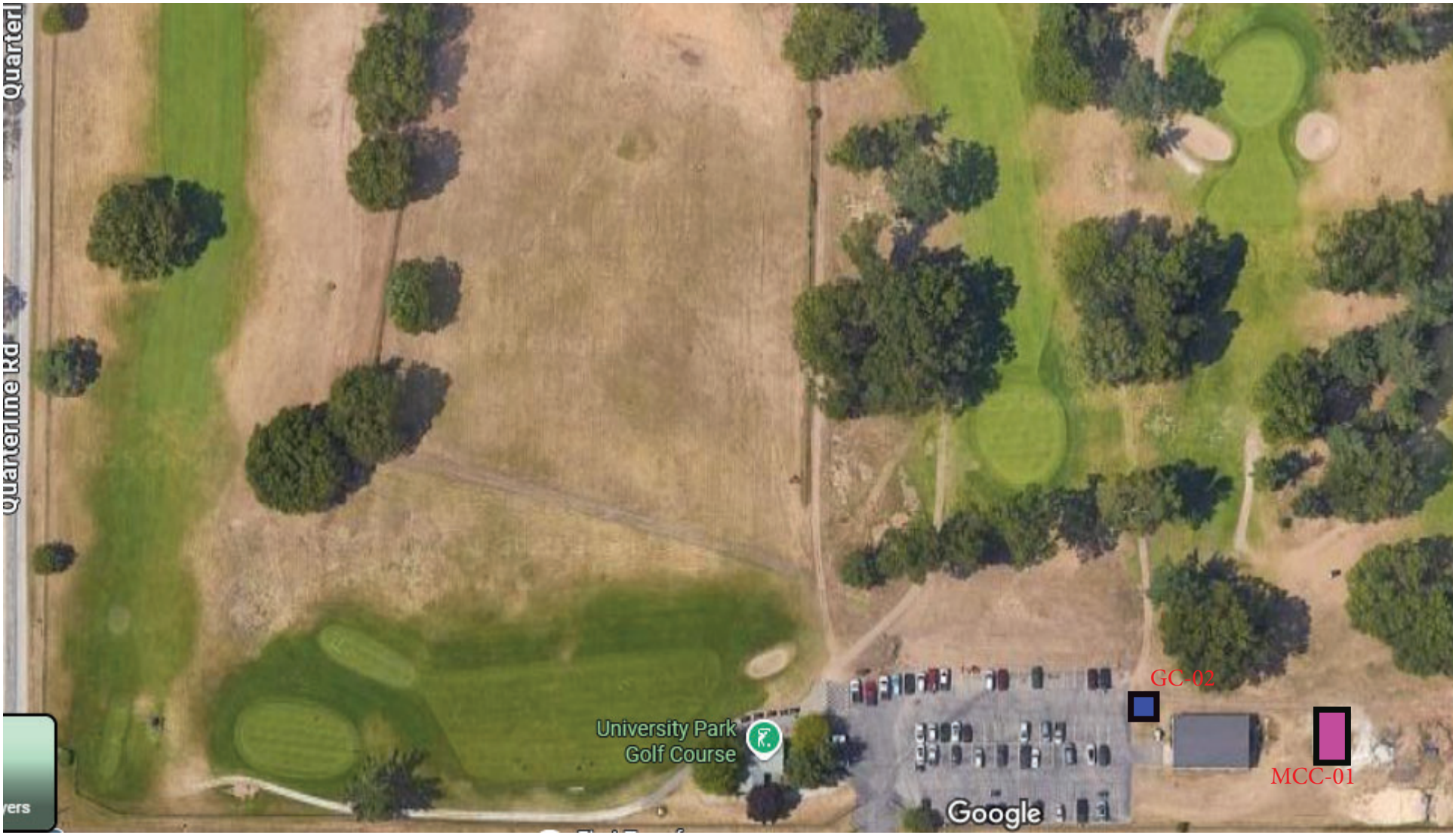
Key
Dischargees(Catchbasins)
Manholes
Outfalls
Roof/foundation/floor
Pipes and Flows
Leach Basin
Fuel Storage
Dumpsters
Dumpsters
Outfalls

N



Key
Dischargees(Catchbasins)
Discharge
Spill Kit

Muskegon Community College- STC



Dumpster

Fuel Tanks

Muskegon Community College Golf Course

maps

SECTION 4 – OPERATIONAL CONTROLS

4.1 List of Significant Materials and Handling and Storage Requirements

The table below provides a list of significant materials stored at each Muskegon Community College location that have the potential to impact storm water quality. For each material, the table describes the handling and storage practices in place as well as the relative potential for discharge. These materials are associated with the following types of activities at MCC facilities:

- Loading, unloading, and other public works material handling activities.
- Outdoor public works material storage areas, including secondary containment structures.
- Activities associated with the maintenance and cleaning of vehicles, machines, and equipment.
- Area(s) that have the potential for soil erosion and sediment discharges (e.g., gravel lots, access roads, material stockpiles, outfalls, etc.)

Table – Significant Materials Stored Onsite (All Locations)

Significant Materials Stored Onsite	Handling and Storage Procedures	Potential to Discharge (High/Medium/Low)
Diesel Fuel (500 gal AST – Main Campus; 185 gal AST – Golf Course)	Stored in double-walled ASTs with integrated secondary containment. Fueling is always attended. Weekly inspection of tanks and containment. Spill kits located nearby.	High
Unleaded Gasoline (250 gal AST – Main Campus; 185 gal AST – Golf Course)	Stored in double-walled ASTs with integrated secondary containment. Fueling is always attended. Weekly inspection of tanks and containment. Spill kits located nearby.	High
All Locations: Vehicle Maintenance Fluids (motor oil, lubricants, radiator fluid, windshield washer fluid, etc.)	Stored indoors in original containers with secondary containment trays. Used fluids collected for proper disposal.	Medium
All Locations: Cleaning Products (Windex, floor cleaners, GS Neutral, etc.)	Stored indoors in janitorial closets with secondary containment trays. Used in small quantities.	Low
All Locations: Paint (water-based)	Stored indoors in sealed containers. Proper disposal used for waste paint.	Low
All Locations: Bagged Salt (for winter maintenance)	Stored indoors on pallets to prevent exposure to precipitation.	Medium
Fertilizers (liquid and granular) – Golf Course	Stored indoors in designated chemical storage building. Liquids stored in secondary	High

	containment: dry fertilizers stored on pallets. Mixing/application conducted on impervious surfaces per label requirements.	
Fungicides, Herbicides, Algaecides, Soil Enhancers – Golf Course	Stored in original containers within chemical storage building. Liquids kept in secondary containment, dry materials kept sealed and elevated. Spill kit available.	High
All Locations: Sediment (gravel, sand, topsoil stockpiles)	Stored outdoors. Stockpiles monitored regularly; BMPs such as tarping and sweeping implemented as needed.	High
All Locations: Trash and General Waste	Stored in dumpsters with lids. Collected regularly for disposal.	Medium

Narrative – Significant Materials and Management Practices

Muskegon Community College (MCC) maintains a variety of materials on-site that, if improperly managed, could potentially discharge to storm water. These materials are stored at four locations: the Main Campus, the Golf Course, the Sturrus Technology Center (downtown Muskegon), and the.

Main Campus

At the main campus, significant materials include petroleum-based products used for vehicle and equipment operations. Two aboveground storage tanks (ASTs) are located on campus: a 500-gallon diesel AST and a 250-gallon unleaded gasoline AST. Both tanks are double walled with secondary containment, inspected weekly, and have spill response kits available nearby. Vehicle fluids such as motor oil, lubricants, radiator fluid, and windshield washer fluid are stored in their original containers indoors with secondary containment. Cleaning products (e.g., Windex, floor cleaners, GS Neutral) are stored in janitorial closets in small quantities. Bagged salt for winter operations is stored indoors on pallets to prevent precipitation exposure. Water-based paints are stored indoors in sealed containers with proper disposal practices followed.

Golf Course

At the golf course, two additional double-walled ASTs are present: a 185-gallon diesel AST and a 185-gallon unleaded gasoline AST. These are inspected regularly, and fueling is always attended. Turf management products, including fertilizers, fungicides, herbicides, algaecides, and soil enhancers, are stored in a designated chemical building. Liquids are placed in secondary containment, while dry products are stored on pallets to keep them off the floor. Mixing and application are conducted on impervious surfaces away from storm drains, following manufacturer instructions and label requirements. A spill response kit is in the chemical storage area to respond to accidental releases.

Sturrus Technology Center (Downtown Muskegon)

The Sturrus Technology Center contains a small garage used for vehicle and maintenance storage. This location does not have aboveground or underground storage tanks and does not dispense fuel on-site.

The only significant materials present include portable gasoline cans, small amounts of motor oil, lubricants, and windshield washer fluid, which are stored in original containers or portable cans in garage. Materials are kept in secondary containment trays or spill-proof cabinets where applicable. Due to the minimal volumes stored, the potential for storm water contamination is low.
This facility follows the standard operating procedures for handling, storage, and spill response as outlined in this plan, including maintaining spill kits and ensuring proper disposal of used fluids through approved vendors.

Summary

For all MCC locations, potential discharges are controlled through proper storage, use of containment systems, covered storage practices, and implementation of best management practices (BMPs). Higher-risk materials (fuels, fertilizers, pesticides, sediment stockpiles) receive the most oversight, including frequent inspections and dedicated containment, while lower-risk products (paints, cleaning products) are controlled through sealed indoor storage.
Through these practices, Muskegon Community College ensures compliance with the Part 5 Rules (Rules 324.2001–324.2009, Michigan Administrative Code) and reduces the risk of pollutants reaching storm water systems.

4.2 Spill Response Procedures

This Spill Response Plan is developed in alignment with the Pollution Incident Prevention Plan (PIPP) prepared in accordance with the Part 5 Rules (Rules 324.2001 through 324.2009 of the Michigan Administrative Code). The plan establishes procedures for preventing, identifying, responding to, and reporting spills or releases of polluting materials at Muskegon Community College facilities.

Reportable Spill, Leak, or Release

A reportable spill, leak, or release at this facility is any unplanned discharge of oil, salt, fuel, chemicals, or other polluting or significant materials that could impact storm water, surface water, or groundwater. This includes:

- **Oil or Fuel:** Any release that creates a visible sheen, film, or discoloration on soil or water, or any quantity reaching a storm drain, waterway, or unpaved ground surface. Releases greater than 55 gallons on land or any amount to surface waters are immediately reportable under state rules.
- **Salt:** Any release greater than 50 pounds (solid) or 50 gallons (liquid) to the ground or storm water system that is not authorized for deicing or dust control.
- **Other Polluting Materials:** Any release of a material listed in Table 1 of Rule 324.2009, or any amount that causes visible turbidity, foaming, unnatural color, deposits, or other adverse impacts to water.
- **Significant Materials (non-polluting):** Spills of fertilizers, pesticides, detergents, solvents, raw materials, or waste products that enter a storm drain, ditch, or surface water. Even if quantities are small, they must be reported if migration off-site or impact to state waters is possible.

Table 1 Polluting Materials – Quick Reference

(From Michigan Administrative Code R 324.2009)

The following materials are classified as polluting materials under Michigan's Part 5 Rules. Spills or releases exceeding the Threshold Reporting Quantity (TRQ) must be immediately reported.

Material	TRQ (lbs)	Notes / Common Uses
Oil (all types)	55 gallons (≈ 450 lbs)	Fuel oil, diesel, gasoline, lubricants
Salt (chloride compounds)	50 lbs solid or 50 gallons liquid	Road deicing, dust control
Acids (e.g., sulfuric, hydrochloric, nitric)	1,000 lbs	Battery acid, cleaning agents
Caustics (e.g., sodium hydroxide, potassium hydroxide)	1,000 lbs	Drain cleaner, industrial degreasers
Ammonia (anhydrous or aqueous)	500 lbs	Fertilizers, refrigeration
Chlorine	10 lbs	Water and wastewater treatment
Cyanides	10 lbs	Rare in public works, but highly regulated
Fluorides	1,000 lbs	Water treatment chemicals
Phenols	1,000 lbs	Industrial cleaners, resins
Heavy Metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel, zinc, etc.)	100–1,000 lbs (varies by metal)	Common in paints, piping, alloys, and corrosion products

The EGLE, WRD Industrial Storm Water program spill reporting guidance document is available for reference purposes when considering reportable spills, leaks, or releases.

The following phone numbers will be used during a spill or release incident:

- Facility Responsible Person/Phone Number: Brian Houts **1-616-808-8045** or Brendan Gray **1-231-206-7175**
- Local Spill Response Contractor Phone Number: W. Michigan Spill Response **1-800-974-2175**
- EGLE District Office Phone Number: **1-800-662-9278**
- EGLE 24-Hour Pollution Emergency Alerting System (PEAS): **1-800-292-4706**

Spill kits containing appropriate materials are in the following locations:

Grounds Maintenance Building, Automotive Classroom, Old Art Building, Fuel Filling Station Main Campus, Fuel Filling Station Golf Course, Maintenance Garage Golf Course, Sturrus Technology Center Garage, Sturrus Center Receiving, Main Campus Old and New Receiving Loading Docks, Boiler House, Both 3rd Floor Mechanical Rooms

Written Procedures –Potential Spill or Leak Areas

Spill Areas and Response

These procedures provide guidance for preventing, responding to, and reporting releases of polluting materials, including oil, fuel, chemicals, and wastes stored or handled on-site.

Staff Responsibilities

- Employees handling polluting materials must complete annual spill prevention and response training.
- Employees must take immediate action to stop, contain, and report spills when safe to do so.
- The Safety and Security Manager (SSM) is responsible for ensuring compliance with Part 5 reporting requirements and coordinating with state agencies.

List of potential spill or leak areas	Spill response procedures and report requirements
Oil & Fuel Storage (aboveground tanks, fueling areas)	• Store in compliant tanks with secondary containment. • Stop fueling immediately if spill occurs; contain with absorbents/booms. • Collect contaminated materials for disposal. • Report all spills to supervisor and (SSM). • Releases reaching surface water or groundwater must be reported to EGLE immediately.
Vehicle & Equipment Maintenance	• Use drip pans and labeled containers for used oil/fluids. • Stop leaks, contain with absorbents, and place waste in proper containers. • Report spills >5 gallons or those entering drains to (SSM) immediately
Chemical Storage Areas (custodial, science labs, maintenance)	• Store in sealed, labeled containers with secondary containment. • Contain and clean small spills; larger spills or those entering drains must be reported to (SSM). • (SSM) will determine if external reporting under Part 5 is required
Loading Docks & Delivery Areas	• Inspect deliveries for leaks before unloading. • Contain spills with absorbents, secure intact product. • Report all spills to supervisor; notify (SSM) if material reaches a drain or soil.
Waste Storage (hazardous waste, used oil, dumpsters)	• Keep containers closed, labeled, and covered. • Transfer leaking containers or overpack as needed. • Report all spills to supervisor and (SSM). Hazardous waste spills managed under both RCRA and Part 5 requirements.
Outdoor Storage Yards (salt, landscaping supplies)	• Cover bulk materials when not in use. • Sweep or shovel spilled material; prevent wash-off into storm drains. • Report significant releases to supervisor; notify (SSM) if release impacts soil, groundwater, or surface water.

Spill Response Flow (PIPP-Based)

1. **Stop** the source if safe.
2. **Contain** with absorbents, booms, or barriers.
3. **Notify** supervisor and SSM immediately.
4. **Clean up** with trained staff or contractor.
5. **Dispose** of contaminated materials properly.
6. **Document** the spill; SSM will determine if reporting to EGLE is required.

4.3 Employee Training Program

Employee training shall be conducted at least once per permit cycle for existing employees and within the first year of hire for new employees to train employees involved in implementing pollution prevention and good housekeeping activities. Records of the employee training program shall be retained for three years. An employee training video retrieved from the EGLE, WRD, Industrial Storm Water webpage will be used.

Written Description –Employee Training Program

Muskegon Community College Employee Training Program

This training program ensures that all employees involved in pollution prevention and good housekeeping activities understand how their work impacts stormwater quality.

Who gets trained:

- All current employees critical to pollution prevention will receive training at least once during each permit cycle.
- New employees will be trained within their first year of hire.

What the training covers:

- How to prevent pollution from entering storm drains.
- Good housekeeping practices for daily tasks.
- Safe handling, storage, and disposal of materials.
- What to do if a spill or leak happens.
- Why stormwater management is important for our facilities and community.

How the training is provided:

- Training will be done through in-person sessions, on-the-job instruction, and by using the Michigan EGLE Water Resources Division stormwater training video.

Training records:

- Sign-in sheets and training materials will be kept on file.

The employee training completion form is included in Appendix 3.

SECTION 5 – STRUCTURAL CONTROLS

Structural controls are implemented at Muskegon Community College (MCC) to prevent or reduce the discharge of pollutants to surface waters of the state. These controls directly correspond to the significant materials identified in Section 4.1 and are shown on facility site maps.

Written Summary –Structural Controls

List of structural controls used onsite	***Identification of the significant materials intended to be managed by the structural control***	***Purpose / Materials Managed***
Diesel Fuel (ASTs – Main Campus 500 gal; Golf Course 185 gal)	Double-walled ASTs with integrated secondary containment	Prevent releases of diesel fuel to soil or storm water during storage or fueling
Unleaded Gasoline (ASTs – Main Campus 250 gal; Golf Course 185 gal)	Double-walled ASTs with integrated secondary containment	Prevent releases of gasoline to soil or storm water during storage or fueling
Vehicle Fluids (motor oil, lubricants, radiator fluid, windshield washer fluid)	Secondary containment trays, spill-proof cabinets	Contain drips and leaks during storage and maintenance
Cleaning Products (janitorial chemicals)	Indoor storage in janitorial closets with containment trays	Prevent accidental release of cleaning agents to drains
Water-based Paints	Sealed indoor storage	Prevent spills and improper disposal
Bagged Salt (winter deicing)	Indoor storage on pallets	Keep salt dry, prevent exposure to precipitation/runoff
Fertilizers (liquid and granular – Golf Course)	Chemical storage building with containment pallets and spill kit	Control spills during storage, mixing, and application
Fungicides, Herbicides, Algaecides, Soil Enhancers (Golf Course)	Chemical storage building with containment pallets and spill kit	Control spills during storage, mixing, and application
Sediment (gravel, sand, topsoil stockpiles)	Outdoor stockpile BMPs (tarping, sweeping, grading, silt fencing as needed)	Reduce sediment-laden runoff from erosion and storm water wash-off
Trash and General Waste	Covered dumpsters	Prevent trash, leachate, and debris from entering storm drains
Sitewide runoff (parking lots, roadways, turf areas)	51 catch basins (inspected annually, cleaned at 40% sump capacity by vendor)	Capture and settle sediment, trash, and floatable before entering storm water system
Spill Events (all fuels and chemicals)	Spill kits staged at all fuel stations, chemical storage areas, and key garages	Provide immediate response to spills with absorbents, booms, and PPE

SECTION 6– RECORD KEEPING

Muskegon Community College will maintain clear and complete records of all activities required under this SOP to demonstrate compliance with the MS4 permit program and the Part 5 Rules. Records will be organized and retained for a minimum of three (3) years, unless otherwise specified by regulation or permit condition.

The following documentation will be maintained:

Good Housekeeping and Routine Maintenance Inspection Reports

- Completed checklists and forms from Appendix 1 documenting routine inspections, cleaning, and corrective actions.

Comprehensive Site Inspection Reports

- Completed inspection forms from Appendix 2, including findings, corrective actions taken, and confirmation of completion.

Employee Training Records

- Sign-in sheets, training agendas, and supporting materials documenting annual and new-hire training on stormwater pollution prevention and spill response.

Waste Disposal and Vendor Manifests

- Documentation of waste removed from catch basins, sweeping activities, or chemical/used oil disposal managed through licensed vendors.

Spill/Release Reports

- Documentation of all spill events, including spill response actions, notifications, and follow-up corrective measures in alignment with the PIPP requirements.

Records will be stored by the Physical Plant Department in both electronic and hard copy formats. These records will be made available upon request to regulatory agencies, auditors, or internal reviewers.

SECTION 7 – ENFORCEMENT RESPONSE PROCEDURE (ERP)

The Enforcement Response Procedure (ERP) establishes the framework Muskegon Community College (MCC) will use to ensure compliance with stormwater pollution prevention requirements under the MS4 permit and applicable state regulations. The purpose of this ERP is to deter violations, compel timely corrective action, and provide consistent enforcement for noncompliance related to illicit discharges, spill response, stormwater structural controls, and post-construction stormwater management practices.

Complaint Investigation and Response

Illicit Discharges

- Complaints of a potential illicit discharge will be investigated within 24 hours of notification.
- If the discharge poses an immediate risk to public health or the environment, responsible parties will be notified within 24 hours.
- If a connection or discharge is identified but not resolved immediately, a written notification will be issued within 10 days requiring corrective action.

Post-Construction Stormwater Compliance

- Complaints regarding noncompliance with stormwater operation and maintenance requirements will be investigated within 5 days, unless there is a risk to health or the environment, in which case immediate investigation will occur.
- Written notice of required corrective actions will be issued within 10 days.

Escalation of Enforcement

- If the responsible party fails to initiate corrective actions within 30 days, a second notice of violation will be issued.
- If corrective actions are not initiated within 60 days, MCC or its contractor will resolve the noncompliance at the responsible party's expense.
- Costs incurred will be invoiced; if unpaid, MCC may place a lien on the property.

MCC may use one or more of the following enforcement tools, depending on the severity and duration of the violation:

- Written Notice of Violation – outlining the nature of the violation and corrective measures required.
- Cease and Desist Order – requiring the immediate cessation of illicit discharges or polluting activity.
- Stop Work Order – halting construction or maintenance activities until compliance is achieved.
- Revocation of Access to the MS4 – if violation continues after notice, or immediately if the discharge presents imminent danger to the MS4 or environment.
- Cost Recovery / Abatement Assessment – MCC or its contractor performs abatement activities, with costs invoiced to the responsible party.
- Assessment for Damages – requiring reimbursement for impacts to MCC facilities or surface waters.
- Injunctive Relief – petitioning the appropriate court to compel compliance or stop violations.

- Civil Infractions – fines issued for ongoing noncompliance.
- Criminal Prosecution – for egregious or repeated violations, treated as a misdemeanor.
- Property Lien – to recover unpaid abatement or damage costs.

Documentation and Tracking

- All complaints, inspections, enforcement actions, and corrective measures will be documented using the Enforcement Action Documentation and Tracking Log (Appendix 4).
- Records will include the date of complaint, investigation findings, enforcement actions issued, corrective measures required, follow-up inspections, and resolution date.
- Records will be retained by the Physical Plant Department for a minimum of three (3) years, consistent with SOP Section 6 – Record Keeping.

SECTION 8 – ILLICIT DISCHARGE ELIMINATION PROGRAM (IDEP)

Section 1

Background

A program must be developed to find and eliminate illicit connections and discharges to the regulated Municipal Separate Storm Sewer System (MS4) from commercial, industrial, private, educational, public, and residential sources.

- An “illicit discharge” is any discharge to, or seepage into, an MS4 that is not composed entirely of storm water or uncontaminated groundwater except discharges pursuant to a National Pollutant Discharge Elimination System (NPDES) permit. A discharge that originates from the applicant’s property and meets the illicit discharge definition is considered an illicit discharge.
- An “illicit connection” is a physical connection to an MS4 that primarily conveys non-storm water discharges other than uncontaminated groundwater into the MS4; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

The IDEP must include procedures and ordinances or other regulatory mechanisms to meet the permit application requirements. For detailed information on IDEP permit application requirements, the MS4 Program’s IDEP Compliance Assistance Document is available for reference.

Section 2

Illicit Discharge Elimination Program

Ensure documentation is maintained for all activities described below.

Section 3

Storm Sewer System Map

An up-to-date storm sewer system map(s) is available at the following location: Physical Plant Document Storge Room or digitally in the Physical Plant office.

Section 4

Prioritization

Muskegon Community College plans to prioritize investigating illicit discharges the following:
1. Dry- Weather Screening
2. Old infrastructure
3. Areas with most potential for illegal dumping/ and or spills

Section 5

Procedure for Performing Field Observations

At a minimum of once per five (5) -year permit term, each outfall and point of discharge is observed during dry weather (at least 48-72 hours after precipitation) to determine if there are signs of a potential illicit discharge. Field screening is performed at outfalls and points of discharge per the timeframe indicated below:

☐ All field observations conducted in year 2 of permit term.
☐ 20% of field observations conducted per year.

Trained staff from Muskegon Community College observe the characteristics of dry weather flow, any staining, or residues, and/or water quality at the receiving water. At a minimum, the focus of the field observation is to observe the following:

- Presence/absence of flow
- Deposits/stains on the discharge structure or bank
- Water clarity
- Color
- Odor
- Structural condition
- Floatable materials
- Vegetation condition
- Biology (e.g., bacterial sheens, algae, and slimes)

Field observation for each outfall or point of discharge is documented using a field form, which is included in Appendix 2. The documentation will include observations for each parameter listed above, as well as an identifier for the outfall/point of discharge, weather conditions (hours since last rain event), staff conducting the screening, and a photo.

If an outfall is submerged due to high water, an effort will be made to screen these outfalls during times of the year when the outfall is exposed (e.g. summer months). When the outfall is constantly submerged, dry weather screening will be conducted at the next upstream manhole or catch basin. This alternate location is still representative of the outfall and should be documented on a field form.

Dry weather screening of points of discharge will be conducted at the last manhole or catch basin before a jurisdictional boundary.

Section 6

Procedure for Performing Field Screening

The following field screening activities will be conducted immediately, but not to exceed one to two days following the initial observations.

Following the identification of dry-weather flow, an upstream investigation will be performed. This investigation will entail reviewing the storm sewer map and tracking or tracing the observed flow

upstream to determine the origin. Accessing manholes or catch basins throughout the drainage area until a source is identified may be required.

If the source of the dry-weather flow is not immediately determined, samples of the flow will be collected. Test strips will be used to analyze pH in the field within 15 minutes of collection. The remaining samples will be taken to Trace Analytical Laboratories in Muskegon MI to be analyzed for *E. coli*, ammonia, and surfactants. Additional parameters may be selected based on field observations and potential source of the potential illicit discharge.

If the dry weather flow appears to be groundwater (e.g. clear water with no odor), field screening will occur to verify that the source of flow is uncontaminated groundwater. Parameters will include *E. coli* and other potential pollutants based on the surrounding land use.

If groundwater contamination is suspected, monitoring will be conducted to determine if any pollutants are present above background concentrations representative of the area if a discharge or release of pollutants had not occurred.

Guidelines for sample collection equipment and methods is available in Dry Weather Screening: A Guide for Permittees, Attachment B.

Section 7

Procedure for Performing Source Investigation

If field screening indicates that additional investigation is necessary to identify the source of the observed dry weather flow, a source investigation will begin immediately, but not to exceed two weeks following the initial observations.

Common methods used as a part of source investigation include, but are not limited to:

- **Visual Inspections:** Generally visual inspections of sites are conducted as a part of the screening process.
- **Records review**: Records typically include storm sewer maps, as-built plans, previous dry weather screening, and information regarding land use (residential, commercial, industrial etc.).
- **Sound Testing:** Sound testing involves tapping or striking a structure and listening for the sound to carry through a pipe. Sound testing is often used to confirm connectivity of the drainage system.
- **Dye Testing:** Dye testing involves inserting a tracer dye in a plumbing fixture or drainage system and observing the presence of the dye at other locations. Dye testing is often used to confirm connectivity. The use of tracer dyes with the potential to discharge to the surface waters of the state are regulated and require a permit from the Michigan Department of Environment, Great Lakes, and Energy (EGLE).
- **Smoke Testing:** Smoke testing involves blowing a non-toxic simulated smoke through the collection system to determine connectivity. Smoke testing requires notifying the residents and local authorities. Smoke found exiting a building plumbing vent indicates that the home is

illicitly connected to the storm sewer. Smoke testing may be inconclusive when water traps or other blockages are present.

- **Video Surveillance:** Closed Circuit Television Video (CCTV) sewer inspections are commonly used to look at pipe conditions and locate connecting pipes (or taps) in the sewers. Video the sewer pipes may not by itself confirm connectivity and may be followed by dye testing or other similar approach.
- **Sandbagging:** Temporarily sandbagging a sewer pipe may be useful to check for intermittent flow conditions. Sandbagging involves partially blocking the lower portion of a drainage pipe and is only used during dry weather conditions.

Section 8

Procedure for Responding to Illegal Dumping/Spills

Illegal dumping and spills to the MS4 are typically discovered by either visual and/or olfactory observations and are subsequently reported by citizens or staff. An on-going effort to educate the citizens about water quality issues is critical to the success of decreasing illegal dumping into the storm water catch basins/inlets and is included in the public education plan. Citizens are advised to report illegal dumping or spills by calling Campus Security at 231-777-0545 or Physical Plant office at 231-777-0318.

A complaint related to illegal dumping or spills will be investigated by Safety Security Manager or Physical Plant Director within 24-hours of receiving notification. Actions will be taken following the Enforcement Response Procedure.

Section 9

Compliance and Enforcement Procedure for Illicit Discharges, Spills, and Dumping

Large spills requiring emergency response will be handled by Muskegon Fire Department and Muskegon County Haz Mat Response Team.

When a complaint or report of a suspected improper connection or illicit discharge is received, the following steps will be followed: (1) documenting the complaint or suspicion in the tracking system, (2) investigation, (3) source identification, (4) voluntary and/or enforced corrective action, and (5) administrative tracking of steps 1 through 4 to assure remedy and closure.

A tracking system is important because locating and correcting a known or suspected discharge may not be immediately achievable. The tracking system is described in the Enforcement Response Procedure SWMP Template.

Section 10

Spill Reporting

For facilities subject to the Part 5, Spillage of Oil and Polluting Materials administrative rules (Part 5 Rules) promulgated pursuant to Part 31, Water Resources Protection, of the Natural Resources and

Environmental Protection Act, 1994 PA 451 (NREPA), additional site-specific reporting requirements will be followed.

The noncompliance notification requirements below will be followed in response to all instances of noncompliance, including:

1) Spills, illicit connections, or dumping to the permitted MS4.
2) Releases from municipal facilities that result in a discharge to waters of the state.

Section 11

Noncompliance Notification

All instances of noncompliance will be reported as follows:

24-Hour Reporting:
Within 24 hours of becoming aware of any noncompliance which may endanger health or the environment, Muskegon Community College, will report to EGLE verbally by calling EGLE's 24-hour Pollution Emergency Alerting System telephone number, 1-800-292-4706. Also, within five (5) days, written notification will be provided via MiEnviro Portal by submitting an "NPDES Unscheduled Permit Required Report" form.

Other Reporting:
Within five (5) days of becoming aware of other instances of noncompliance, Muskegon Community College will provide written notification via MiEnviro Portal by submitting an "NPDES Unscheduled Permit Required Report" form.

Written notification will include:

1) A description of the discharge and cause of noncompliance
2) The period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue.
3) The steps taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Section 12

IDEP Training and Evaluation

Training will be provided to all staff employed by Muskegon Community College who may come into contact or observe an illicit discharge to the MS4. Training topics will include:

- Techniques for identifying an illicit discharge or connection, including field observation, field screening, and source investigation.
- Procedures for reporting, responding to, and eliminating an illicit discharge or connection and the proper enforcement response.

Training will occur on the following timeframe:

☒ Once per year (recommended)

☐ Once every permit term for existing employees and within the first year of hire for new employees (required at a minimum)

Staff attending training will sign the IDEP Training Form to record attendance.

Section 13

Evaluation of Overall Effectiveness

At the time each progress report is prepared, staff will compile a spreadsheet or narrative description of illicit discharges discovered during the reporting period, and corresponding method of detection (e.g. dry weather screening, complaint, notification from staff, wet weather screening, or alternate approach), enforcement method used to eliminate illicit discharge, and time elapsed before discharge was eliminated. The most recent method of staff training method prior to the illicit discharge being discovered may also be considered in the evaluation. The Illicit Discharge Elimination Evaluation Form is available for download on the MS4 webpage for use in organizing this information and facilitating the evaluation. This information will be reported in the progress report and will be retained to evaluate overall effectiveness at the end of each permit term. The results of the evaluation will be considered when determining IDEP procedures for the next permit term.

Section 14

IDEP Ordinance(s) or Other Regulatory Mechanism(s)

The IDEP ordinance(s) or regulatory mechanism(s) available at the following webpage https://www.muskegoncc.edu/facilities/physical-plant/

SECTION 9 – CONSTRUCTION STORMWATER RUNOFF CONTROL PROGRAM

Muskegon Community College (MCC) is committed to preventing soil erosion and sediment discharges during construction activities on its properties. In Michigan, Part 91, Soil Erosion and Sedimentation Control (SESC), of the Natural Resources and Environmental Protection Act (NREPA), requires permits and control measures for earth changes that disturb one (1) or more acres of land, or any earth change within 500 feet of a water body. MCC coordinates with County Enforcing Agencies (CEAs), Municipal Enforcing Agencies (MEAs), and the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to ensure compliance.

Oversight and Enforcement Agencies

The agencies responsible for SESC permitting and oversight for MCC projects are identified below:

CEA/MEA/APA/EGLE	Contact Person	Phone	Email
Muskegon County Enforcing Agency (CEA)	Soil Erosion and Sedimentation Control Officer	(231) 724-6411	soilerosion@co.muskegon.mi.us
City of Muskegon (MEA – for Sturrus Technology Center)	Building/Engineering Department	(231) 724-6702	jake.eckholm@shorelinecity.com
EGLE Water Resources Division (WRD)	District Compliance Staff	1-800-662-9278	EGLE-assist@michigan.gov

Notification of Construction Site Discharges to the MS4

- If MCC staff observe sediment, soil, or other pollutants from a construction site discharging to the MS4 or surface waters, notification will be made to the appropriate CEA/MEA contact within 24 hours.
- If the discharge involves direct impact to the MS4 or Waters of the State, MCC will notify EGLE district compliance staff via phone, email, or MiEnviro Portal within 24 hours.
- Notifications are tracked in MCC's Enforcement Action Documentation and Tracking System.

Verification of Part 91 Permits

- For MCC-owned projects, the Director of Physical Plant (or designee) confirms that a Part 91 SESC permit is obtained prior to starting any earth change that disturbs ≥1 acre or is within 500 feet of water.
- Contractors must provide proof of the Part 91 permit during the project pre-construction meeting.
- MCC will not authorize construction activities until SESC permit documentation is verified.

Permit by Rule Requirements (Part 21 – Rule 2190)

- Projects disturbing ≥1 acre with discharge to Waters of the State must also comply with Michigan's Permit by Rule requirements.

- The landowner/easement holder (MCC or contractor) must have a certified stormwater operator who inspects the site weekly and within 24 hours after every precipitation event resulting in discharge.
- For projects ≥5 acres, a Notice of Coverage must be filed via MiEnviro Portal.
- MCC communicates Permit by Rule requirements to contractors through pre-construction meetings, contract specifications, and bid documents.

Construction Site BMPs

MCC requires all contractors and construction managers to implement BMPs to control stormwater runoff, including:

- Installation of silt fencing, inlet protection, and stabilized construction entrances.
- Use of temporary sediment basins or traps where appropriate.
- Proper stockpile management, including covering or perimeter controls.
- Good housekeeping measures for chemicals, fuels, and waste storage onsite.
- Routine inspection and maintenance of erosion control measures.
- Immediate stabilization (seeding, mulching, erosion blankets) of disturbed areas once construction phases are complete.

Education, Oversight, and Enforcement

- Pre-construction meetings will include review of erosion and sediment control requirements.
- MCC staff will periodically inspect active construction sites for compliance with BMPs and permit requirements.
- Noncompliance or observed discharges will trigger enforcement per MCC's Enforcement Response Procedure (Section 7.0).
- Contractors are responsible for all costs related to cleanup, enforcement, or remedial measures if violations occur.

Recordkeeping

- Records of all construction stormwater notifications, inspections, corrective actions, and enforcement activities will be retained for a minimum of three (3) years in accordance with the MS4 permit.
- Documentation includes copies of Part 91 permits, proof of Permit by Rule coverage, inspection forms, and enforcement records.

SECTION 10 – POST-CONSTRUCTION STORMWATER PROGRAM

Post-construction stormwater runoff refers to runoff from a project site after completion of construction. Without proper controls, development or redevelopment projects increase stormwater volume, peak flow rates, and pollutant loads that may adversely impact surface waters. The MS4 permit requires MCC to establish a program to ensure that post-construction stormwater management controls are incorporated into all applicable projects.

MCC's program is built on performance standards, site plan review, long-term operation, and maintenance (O&M) of Best Management Practices (BMPs), and enforcement procedures.

Section A

Ordinance or Other Regulatory Mechanism

As a public educational institution, MCC does not have ordinance authority. Therefore, post-construction stormwater controls are implemented through an internal written policy approved by MCC administration and enforced through the site plan review and project approval process.

All new development and redevelopment projects disturbing one acre or more (or less than one acre if part of a larger common plan of development that will disturb one acre or more) are subject to MCC's post-construction runoff control requirements.

Section B

Water Quality Treatment Performance Standard

Each regulated project must incorporate BMPs to manage and treat stormwater. The minimum design performance standards are:

- Capture and treat one inch of runoff from the entire project site OR
- Capture and treat the runoff generated by the 90% annual non-exceedance storm for Muskegon County (0.9 inches per EGLE guidance).

Treatment BMPs must be designed to achieve:

- ≥80% Total Suspended Solids (TSS) removal, OR
- A discharge concentration of ≤80 mg/L TSS.

Acceptable BMPs include detention/retention basins, bioswales, infiltration practices (where appropriate), vegetated filter strips, permeable pavement, and proprietary treatment devices with verified removal efficiencies.

Section C

Channel Protection Performance Standard

To prevent streambank erosion and channel instability, post-development runoff volume and peak flow rates for the 2-year, 24-hour storm event must be maintained at or below pre-development conditions.

- Runoff calculations will follow the NRCS Curve Number method (TR-55 or equivalent hydrologic model).
- Where infiltration is not feasible (tight soils, space limitations), MCC may require green infrastructure alternatives (rain gardens, green roofs, cisterns) or an off-site mitigation approach.

Section D

Site-Specific Requirements

- Contaminated Sites: Infiltration BMPs are prohibited in areas with known soil or groundwater contamination, unless approved by EGLE and risk assessments confirm no exacerbation of contamination.
- Hot Spots: Sites with high pollutant risk (fuel storage, vehicle maintenance, chemical handling) must include targeted BMPs such as oil-water separators, lined rain gardens, or containment features.

Section E

Green Infrastructure and Low Impact Development (LID)

MCC encourages the use of LID practices and green infrastructure in site planning. Options include:

- Bioretention cells/rain gardens
- Vegetated swales
- Tree plantings and no-mow buffer zones
- Permeable pavements
- Green roofs (where feasible)
- Capture and reuse (cisterns, rain barrels)

Section F

Site Plan Review Procedure

- Developers (including MCC's own capital projects) must submit site plans showing drainage areas, impervious cover, stormwater controls, and long-term O&M provisions.
- The Director of Physical Plant or designee reviews plans using a standard checklist to verify compliance with water quality and channel protection standards.
- Approved plans must include construction-phase inspection provisions and an as-built certification.
- Records of site plans, approvals, and as-built inspections are retained for a minimum of 3 years.

Section G

Long-Term Operation & Maintenance (O&M) of BMPs

Agreement Contents: The agreement shall, at a minimum, provide the applicant with the authority to:

- Inspect BMPs to ensure they are functioning as designed.
- Perform necessary maintenance or corrective actions if the owner/operator fails to do so.
- Recover costs from the responsible party if the applicant is required to perform maintenance.
- Track transfer of responsibility for BMP maintenance when property ownership changes**.**
- Perpetuity: The maintenance agreement shall ensure that BMPs are preserved and maintained **in** perpetuity to continue meeting the performance standards.
- Recordkeeping:

MCC will maintain files including:

- Approved site plans & O&M agreements.
- Inspection logs and maintenance records.
- Enforcement tracking documentation.

Section H

Enforcement and Tracking

Noncompliance will be addressed under MCC's Enforcement Response Procedure (ERP) (see Section 7). Enforcement tools may include:

- Written notices of violation
- Stop-work orders for construction projects.
- Corrective action requirements for BMP O&M failures
- Cost recovery for corrective maintenance performed by MCC.

Violations and enforcement actions will be tracked in MCC's Enforcement Action Documentation and Tracking system.

Section I

Measurable Goals

- 100% of new/redevelopment projects ≥1 acre reviewed for stormwater compliance.
- 100% of approved BMPs include an O&M agreement or designation of responsibility.
- BMPs inspected at least annually by MCC facilities staff.
- Documented TSS removal performance through design standards at all applicable sites

SECTION 11 – TMDL IMPLEMENTATION PLAN

Under the federal Clean Water Act, when surface waters are identified as impaired due to not meeting one or more designated uses established in Michigan's Water Quality Standards (WQS), a Total Maximum Daily Load (TMDL) must be developed. A TMDL sets the maximum daily load of a pollutant that a water body can assimilate and still meet WQS.

Muskegon Community College (MCC) discharges stormwater into Four Mile Creek, which is included in Michigan's statewide E. coli TMDL. E. coli is used as an indicator of fecal contamination from humans, pets, livestock, or wildlife. Elevated concentrations impair designated uses such as total and partial body contact recreation.

MS4 permittees, including MCC, are required to implement a TMDL Implementation Plan to reduce the discharge of E. coli from stormwater outfalls and to monitor progress toward achieving WQS.

TMDL(s) in Application

Name of TMDL	Pollutant of Concern	Waterbodies in TMDL Area
Statewide E. coli TMDL	E. coli bacteria	Four Mile Creek, Muskegon, MI

Best Management Practices (BMPs) for E. coli Reduction

MCC implements a range of BMPs across its facilities to reduce the potential for E. coli contamination of stormwater. These practices are consistent with the Pollution Prevention/Good Housekeeping (P2/GH) program, Illicit Discharge Elimination Program (IDEP), and education/outreach initiatives described elsewhere in this SOP.

Table – Prioritized BMPs

BMP	Targeted TMDL Pollutant	MCC Implementation Approach
Street sweeping	E. coli (indirectly, by reducing organic debris that promotes bacterial growth)	All parking lots swept seasonally (spring/fall) and as needed based on inspections. Contracted vendor.
Catch basin inspection/cleaning	E. coli (removes debris that can harbor bacteria)	All 51 catch basins inspected annually and cleaned when sump is >40% full.
Dumpster management	E. coli (reduces trash/food waste exposure to runoff)	Covered dumpsters maintained across campus; inspected daily by custodial staff.
Turf management BMPs	E. coli (wildlife attractants reduced)	Fertilizers/pesticides applied per label; no-mow buffer zones maintained at golf course ponds to deter waterfowl congregation.
Public education – pet waste	E. coli	Staff and students educated annually on proper disposal. "No Dumping – Drains to Lake Michigan" storm drain markers installed on campus.

Illicit Discharge Elimination Program (IDEP)	E. coli	Dry weather screening performed; illicit connections and dumping prohibited and enforced under ERP.
Wildlife/waterfowl management	E. coli	Vegetation buffers maintained near ponds and low-mow strategies used to discourage goose congregation.

Monitoring Plan – E. coli

Wet weather monitoring will be performed at MS4 outfalls discharging to Four Mile Creek. The purpose is to establish baseline E. coli levels, evaluate BMP effectiveness, and track progress toward meeting WQS.

Year 1 Monitoring

- MCC will collect grab samples during wet weather events from each outfall discharging to Four Mile Creek.
- Samples will be analyzed for E. coli using a certified laboratory.
- Any outfall results exceeding 1,000 CFU/100 mL will trigger follow-up investigation to identify sources.

Follow-Up Investigation

- Outfalls exceeding the threshold will be assessed via upstream catch basin inspection, dye/smoke testing if needed, and IDEP investigation to locate illicit discharges or connections.

Year 4 Monitoring

- A second round of sampling will be conducted at the same outfalls.
- Results will be compared to Year 1 data to determine BMP effectiveness and progress toward reducing pollutant loads.

Documentation

- Results will be recorded in MCC's inspection and monitoring database.
- Data will be included in annual progress reports to EGLE.

Noncompliance and Reporting

- Spills or illicit discharges resulting in potential E. coli impacts will be reported following MCC's Spill Response Plan (Section 4.5) and Illicit Discharge Elimination Program (Section X).
- All instances of noncompliance that may endanger health or the environment will be reported to EGLE's Pollution Emergency Alerting System (PEAS) within 24 hours at 1-800-292-4706, with written notification submitted within five (5) days via the MiEnviro portal.

Evaluation of Effectiveness

MCC will evaluate BMP effectiveness using:

- Monitoring results (Year 1 vs. Year 4).
- Tracking spreadsheet of illicit discharges, spills, and ERP actions.
- Staff training records (annual stormwater training includes E. coli awareness).
- Public education and outreach tracking (materials distributed, participation numbers).

Adjustments to BMPs, inspection frequencies, or monitoring efforts will be made if progress is not sufficient to demonstrate reductions.

SECTION 12 – PUBLIC PARTICIPATION PROGRAM (PPP)

The Public Participation Program (PPP) ensures that citizens, students, staff, and community stakeholders can review, comment on, and participate in the development and implementation of Muskegon Community College's Stormwater Management Plan (SWMP). Public involvement helps foster awareness, accountability, and collaborative efforts to protect water quality in the 4 Mile Creek watershed and other receiving waters.

Public Access to the SWMP

The Muskegon Community College SWMP is made available to the public on the College's Facilities/Physical Plant webpage. The webpage includes:

- A downloadable copy of the full SWMP.
- Contact information for the stormwater program manager (Director of Physical Plant) to submit questions, comments, or concerns.

Website location: https://www.muskegoncc.edu/facilities/physical-plant/

Public Participation in Implementation and Review

MCC will notify the public at least once per year that the SWMP is available for review and that opportunities for public comment are open. Notification methods will include:

- Announcement on the MCC website (homepage banner or Physical Plant page update).
- Social media posts via official MCC channels.
- An informational display during MCC's annual Sustainability Council events or campus-wide Earth Day activities.

Community members may submit comments through email, web forms, or in writing. All comments will be reviewed by the Stormwater Program Manager, and feedback will be incorporated into updates of the SWMP where appropriate.

Public Notice Requirements

MCC does not have a separate ordinance requiring formal legal notices for stormwater-related public comment. Public notice requirements are met through the combination of website postings, annual events, and direct communication channels provided by the College.

Roles and Responsibilities

- Director of Physical Plant (Program Manager): Maintains the SWMP, ensures it is posted online, and responds to public input.
- Facilities and Grounds Staff: Support public outreach by providing updates and materials during events.
- Sustainability Council & Student Engagement Programs: Collaborate to promote stormwater awareness, especially during educational campaigns.

Documentation

- Copies of public notices, website postings, and event flyers will be retained.
- Records of public comments and responses will be maintained for at least three years.
- Annual summaries of public participation will be included in progress reports under the MS4 permit.

SECTION 13 – PUBLIC EDUCATION PROGRAM (PEP)

The Public Education Program (PEP) is designed to increase knowledge and promote positive behavior change among students, staff, contractors, and the community, with the goal of reducing pollutants in stormwater runoff. MCC will use targeted outreach and educational activities to ensure stakeholders understand their role in protecting stormwater quality and preventing illicit discharges.

MCC may also collaborate with watershed councils, local governments, and community organizations to leverage shared resources and messaging.

Responsible Party

The Director of Physical Plant serves as the Stormwater Program Manager and is responsible for implementing, tracking, and evaluating the Public Education Program. Facilities staff and the Sustainability Council will assist in delivery and recordkeeping.

Prioritization

Muskegon Community College will not be prioritizing any one PEP topic. MCC will focus on a large range of public education topics including but not limited to, pet waste proper clean up, eliminating pollutants in drains, proper application and use of pesticides and fertilizers.

Target Audience

The following audiences will be engaged:

- General public (visitors, community members)
- Students and faculty (educational institutions)
- College employees (maintenance, custodial, groundskeeping, and staff)

Delivery Mechanisms

MCC will use a combination of outreach methods to reach target audiences, including:

- College website updates (stormwater program)
- Social media posts through MCC's official accounts
- Storm drain markers and pet waste disposal signage where applicable

Public Education Topics and Implementation Plan

Stormwater Awareness

Key Message (topic)	Target Audience (see list above)	Delivery Mechanism (see list of options above)	Measurable Goal	Schedule of Implementation (Spring, Fall, year-round, etc.)
Connection of the MS4 to area waterbodies and potential impacts	General Public/Employees	Social Media/Posters	Measure engagement with social media. 75 people	Will be covered twice per year. In a monthly Social Media post

Public responsibility and stewardship in the applicant's watershed(s)	General Public/Employees	Social Media/Posters	Measure engagement with social media. 75 people	Will be covered twice per year. In a monthly Social Media post
Benefits of green infrastructure and low impact development	General Public/Employees	Social Media/Posters	Measure engagement with social media. 75 people	Will be covered twice per year. In a monthly Social Media post

Illicit Discharges

Key Message (topic)	**Target Audience (see list above)**	**Delivery Mechanism (see list of options above)**	**Measurable Goal**	**Schedule of Implementation (Spring, Fall, year-round, etc.)**
Detection and elimination of illicit discharges	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Public reporting of illicit discharges	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Proper septic system care and maintenance and recognizing system failure	N/A	N/A	N/A	N/A

Proper Application of Materials

Key Message (topic)	**Target Audience (see list above)**	**Delivery Mechanism (see list of options above)**	**Measurable Goal**	**Schedule of Implementation (Spring, Fall, year-round, etc.)**
Deicing Material	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Pesticides, Herbicides, Fertilizers	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post

Proper Disposal of Wastes

Key Message (topic)	Target Audience (see list above)	Delivery Mechanism (see list of options above)	Measurable Goal	Schedule of Implementation (Spring, Fall, year-round, etc.)
Grass clippings and leaves	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Pet waste	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Household hazardous waste	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Commercial and industrial waste	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post
Educational and institutional waste	General Public/Employees	Social Media	Measure engagement with social media. 75 people	Covered in the twice per year social media post

Evaluation

Effectiveness of the PEP will be evaluated through:

- Tracking number of social media post views/interactions.
- Tracking number of event participants and flyers distributed.
- Training attendance logs for employees and contractors.
- Review of complaints/reports received from public participation and illicit discharge reporting.

If measurable goals are not met, MCC will adjust messaging frequency, delivery methods, or target audiences in the next permit cycle.

SECTION 14 – Pollution Prevention

Pollution Prevention and Good Housekeeping (P2/GH) Program

The Pollution Prevention and Good Housekeeping minimum control measure focuses activities on ensuring that municipal facilities and operations are managed in ways that will minimize contamination to stormwater discharges from these facilities. Facilities may include, but are not limited to, municipally owned or operated buildings, campuses, parks, public works facilities, and infrastructure. Various operation and maintenance activities addressed may include but are not limited to street and bridge maintenance; road salt storage and application; vehicle and fleet maintenance; stormwater system maintenance; solid waste management; park and open space maintenance; and pesticide and fertilizer applications.

Ensure documentation is maintained for all activities described below.

Section A

Municipal Facility and Structural Stormwater Control Inventory

An inventory of all permittee-owned or operated facilities/properties with a discharge of stormwater to surface waters of the state is included in the table below.

Municipal Facilities

Facility	Address
Muskegon Community College Main Campus	221 S. Quarterline Muskegon, MI 49442
Muskegon Community College Sturrus Technology Center	388 W Clay Muskegon, MI 49440
Muskegon Community College Public Golf Course	2100 Marquette Muskegon, MI 49442

An inventory identifying all stormwater structural controls with a discharge of stormwater to surface waters is included below. Additionally, an estimated number of structural stormwater controls are provided. *[check applicable boxes and provided estimated total]*

☒ Catch Basins 70
☐ Detention Basins
☐ Oil/Water Separators
☐ Stormwater Pump Stations
☐ Constructed Wetlands
☐ Infiltration Basins/Trenches
☐ Porous Pavement
☐ Rain Gardens
☐ Underground Storage Vaults/Tanks
☐ Secondary Containment
☒ Other: 2 Ground water pump station

Section B

Up-To-Date Map(s)

Up-to-date map(s) including facilities and stormwater structural controls are available in the Physical Plant document storage room or digitally in the Physical Plant office Revision of Municipal Facility and Structural Stormwater Control Inventory
The municipal facility and structural stormwater control inventory and map(s) will be updated within 30 days following the addition or removal of a facility or structural stormwater control.

Section C

Facility-Specific Stormwater Management – Facility Assessment

The following criteria are used when assessing each facility identified above for the high, medium, or low potential to discharge pollutants to surface waters of the state:

1. Amount of urban pollutants and/or significant materials stored at the site (e.g., sediment, nutrients, metals, hydrocarbons, pesticides, fertilizers, herbicides, chlorides, trash, bacteria, bulk salt, brine or other site-specific pollutants.
2. Identification of improperly stored materials.
3. The potential for polluting activities to be conducted outside (e.g., vehicle washing).
4. Proximity to water bodies.
5. Poor housekeeping practices.
6. Discharge of pollutants of concern to impaired waters.

This procedure will be updated/revised 30 days prior to discharging stormwater from a new facility and within 30 days of determining a need to update/revise the facility assessment.

Section D

Facility-Specific Stormwater Management – Prioritized Facilities

A list of prioritized facilities using the assessment provided above is included in the table below.

Prioritized Facilities

Facility	Potential to Discharge Pollutants to Surface Waters of the State (Low, Medium, High)	Criteria Present (list specific criteria from above that apply)
Muskegon Community College Main Campus	Medium	Salt use for ice control, proximity to 4-mile Creek. Minimal Equipment Storage, with low risk of pollution.
Muskegon Community College Sturrus Technology Center	Medium	Salt use for ice control.
Muskegon Community College Public Golf Course	Medium	Golf Course fertilizers, pesticides, Proximity to 4-mile Creek. Store a small amount and purchase only as needed.

Section E

Facility-Specific Stormwater Management – High Potential for Pollutant Runoff

☒ N/A (No facilities identified with a high potential to discharge pollutants to waters of the state)

Section F

Facility-Specific Stormwater Management – Medium and Low Potential for Pollutant Runoff

The following Best Management Practices (BMPs) are implemented at facilities identified with a medium or low potential to discharge pollutants to surface waters of the state:

- Good housekeeping practices such as ensuring dumpsters are in good condition and lids are closed, managing trash throughout the property etc.
- Maintaining a clean and orderly facility.
- Catch basin inspections/cleaning.
- Street/parking lot sweeping.
- Vegetation management.
- Employee training.

If the BMPs listed above are not applicable, please explain why.
☐

Section G

Catch Basin Inspection, Maintenance, and Cleaning

All permittee owned and operated catch basins within the jurisdiction will be inspected, maintained, and cleaned according to one (1) of the options below:
☒ All catch basins will be inspected annually.
☐ All catch basins will be prioritized low, medium, or high for routine inspection, maintenance, and cleaning. [if you select this option, please provide additional information as indicated below]

Catch basin inspections will include observations of sediment accumulation, structural conditions, and other relevant observations (i.e. illicit discharges). Debris levels within the sump of a catch basin are determined by measuring the distance between the lowest outlet pipe and the top of the sediment with a grade rod (pole) with distance markings. The distance between the lowest outlet pipe and the bottom of the sump is also determined either by field measurement or historical record. Inspection documentation is maintained paper form, scanned to file digitally.

If the permittee determines during the inspection of catch basins or via citizen complaint that more frequent inspection, maintenance, and/or cleaning is necessary, Muskegon Community College will revise its frequency for inspection of a specific structure accordingly. Any changes to the priority level of a catch basin will be recorded in the permittee's procedure or tracking system within 30 days. New catch basins will also be included in the permittee's procedure or tracking system and assigned a priority within 30 days.

All applicant-owned or operated catch basins will be cleaned out when the sump is 40 percent or more full of sediment. Waste generated from catch basin cleaning activities will be managed accordingly and disposal documentation will be maintained.

☒ Catch basin cleaning is contracted out. Contractor will follow all laws and regulatory rules while disposing of Debris from MCC. The contractor will also follow all state guidelines and applicable laws for dewatering.

☐ Waste is taken to the wastewater treatment plant (WWTP). Provide name of WWTP:

☐ Liquids generated are dewatered to the sanitary sewer at provide location. Solids generated are disposed of at a designated landfill.

Muskegon Community College will prioritize basins that drain within 20 yards of a surface water of the state. Also heavily trafficked areas.

Section H

Other Stormwater Structural Controls Inspection and Maintenance

In addition to catch basins other stormwater structural controls are inspected and maintained. The type of structural control and the frequency of inspection and maintenance is included in the table below.

Other Stormwater Structural Controls

Structural Control	Activity	Frequency
Example: Detention Basin	Inspection Vegetation Management Inlet/Outlet Cleaning Trash/Debris Removal Sediment Removal	Annual Seasonally/As Needed Seasonally/As Needed Seasonally/As Needed As Needed
☐ Bioretention Basin		
☐ Detention Basins (Wet)		
☒ Detention Basins (Dry)	Inspection Vegetation management	As needed
☐ Infiltration Trench		
☐ Mechanical Treatment		
☐ Pervious Pavement		
☐ Pump Stations (Stormwater)		
☐ Rain Garden		
☒ Other: Ground water sump	Inspection/ sediment removal	As needed

Waste generated from the maintenance of each structural control will be managed in the following ways:

- Clean/uncontaminated sediment may be applied to an upland area onsite and will be seeded.
- Contaminated sediment will be landfilled.
- Trash and debris will be landfilled.
- Organic material may be composted or used as mulch onsite.

New Applicant Owned/Operated Facilities and Stormwater Structural Controls

- All new permittee-owned or operated facilities and stormwater structural controls for water quantity will be designed and implemented in accordance with the post-construction runoff control performance standards and long-term operation and maintenance requirements.

The above table and waste disposal procedures will be updated within 30 days following the implementation of a new structural stormwater control.

Section I

Maintenance Operations and Municipal Activities

The maintenance operation and municipal activities conducted by the applicant are outlined below. BMPs implemented to prevent or reduce pollutant runoff are also provided. *[check all that apply and provide BMPs]*

Activity	BMPs Implemented to Prevent and/or Reduce Pollutant Runoff
Example: Vehicle Washing/Equipment Maintenance	• Vehicles and equipment are washed in the designated wash area that drains to the sanitary sewer. • Vehicles and equipment maintenance occurs in an area where fluids cannot impact the MS4 (indoors). • Spill kit is maintained onsite.
☐ Street, Parking Lot, Sidewalk, or Bridge Maintenance	
☐ Unpaved Road Maintenance	
☐ Rights-Of-Way Maintenance	
☒ Vehicle Washing/Equipment Maintenance	Done Indoors so drains to sanitary Building is equipped with spill kits
☒ Cold Weather Operations: Plowing	As much snow as possible is placed on unpaved areas, snow relocated to infiltration areas as allowed
☒ Cold Weather Operations: Salting/Brine	Use salt only as necessary and clean up extra salt as needed. Store salt bags inside of building

Street/Parking Lot Sweeping

All permittee owned and operated streets, parking lots, and other impervious infrastructure will be swept according to one (1) of the options below:

Street Sweeping

☐ All streets will be swept _____ times annually (minimum of twice per year)

☐ All streets will be prioritized low, medium, or high for routine inspection, maintenance, and cleaning. [if you select this option, please provide additional information as indicated below]

☐ N/A (permittee does not own/operate streets)

Parking Lot Sweeping

☐ Parking lot sweeping will be conducted in conjunction with street sweeping.

☒ All parking lots will be inspected 2 times annually (minimum of once per year in the spring) to determine if sweeping is needed.

☐ Other: _____

The following criteria are used when assessing each street, parking lot, or impervious infrastructure for low, medium, or high priority:

- Amount of sediment and debris accumulation
- Complaints from the public
- Areas susceptible to flooding.
- High traffic areas
- Road condition
- Surrounding land use
- Maintenance work

Priority Level	**Sweeping Frequency**
Low	Twice Annually (before spring rains and after leaves have fallen)
Medium	
High	

Provide the reference to the narrative description **or** map submitted above with the geographic location of the catch basins in each priority level.

☐ Map attached.

☒ Narrative description: Lots will be inspected and swept as necessary. The South lots of the main campus that have an outfall within 20 yards of the creek will take priority. Lots located AT MCC Sturrus center will also be inspected and swept as priority as it goes to the City of Muskegon Storm System.

Each street and parking lot will be assigned a priority level with an associated cleaning schedule. If the permittee determines based on street sweeping findings, staff observations, or citizen complaint that more frequent sweeping is necessary for a street or parking lot, the permittee will revise its priority level for the street or parking lot. Any changes to the priority level of a street or parking lot will be recorded in the permittee's procedure or tracking system within

30 days. The prioritization will also be updated within 30 days following the construction of a new permittee-owned street, parking lot, or other impervious surface.

Sweeping equipment will be operated and maintained according to the manufacturer's operating instructions. Waste generated from sweeping activities will be managed accordingly and disposal documentation will be *maintained [Refer to the following compliance assistance document for disposal options:* MS4 Catch Basin and Street Sweeping BMPs*.]*

☒ Sweeping activities are contracted out.

☐ Solids generated are temporarily stored at list location prior to disposal at a designated landfill.

Section J

Managing Vegetated Properties

Select one (1) of the following options:

☒ Pesticides are ready-to-use products in the original containers.

☒ Application of pesticides is conducted by a State of Michigan certified applicator.

☐ Pesticides are not applied.

Section K

Contractor Requirements and Oversight

All contractors that perform municipal operation and maintenance activities are required to comply with all pollution prevention and good housekeeping BMPs. This is accomplished through:

☒ P2/GH BMPs included in bid documents. Contractors hired by the permittee to perform municipal operation and maintenance activities are contractually required to comply with all applicable P2/GH BMPs.

☒ Signed contractor agreement.

☒ Oversight by permittee (documented site inspections)

Section L

Employee Training Program

Training will occur for all staff involved in implementing or overseeing the P2/GH program. Employees will be trained to prevent and reduce stormwater pollutants from activities like maintaining MS4 infrastructure and performing daily municipal activities. Training activities will be recorded using the Pollution Prevention and Good Housekeeping Training Form provided in Appendix 1.

Training will occur within the following timeframe:

☒ Once per year (recommended)

☐ Once every permit term for existing employees and within the first year of hire for new employees (required at a minimum

SECTION 15 – SOP REVIEW

The facility contacts, inspectors, and other key staff are asked to sign below to acknowledge that they have reviewed the contents of the SOP. The SOP will be updated as needed to reflect current staff and facility operations.

Authorized Representative

Name and Title: Brian Houts, Director Physical Plant

Signature and Date:

Inspector:

Signature and Date:

Staff SOP Review Acknowledgement

Date	Signature

APPENDIX 1 – SOP ROUTINE INSPECTION FORM

GOOD HOUSEKEEPING and ROUTINE MAINTENANCE

DATE:

INSPECTOR'S NAME:

Areas/Items in Routine Inspection Program	***Inspection Frequency***	***Check if completed. If necessary, add notes and applicable corrective actions, including the date corrective actions were completed.***
Dumpsters – lids closed, no leaks/spills	Daily	☐
Paved Surfaces & Parking Lots – swept and free of debris	Seasonally (Spring/Fall) or as needed	☐
Bagged Salt Storage (indoors on pallets)	Weekly during winter season	☐
Aboveground Storage Tanks (ASTs) – integrity, hoses, secondary containment	Weekly	☐
Spill Kits – stocked and ready at each location	Monthly	☐
Chemical Storage (custodial closets, golf course chemical building) – containers sealed; secondary. containment intact	Monthly	☐
Vehicle Maintenance Areas – fluids in trays, no leaks/spills	Weekly	☐
Catch Basins (51 total) – sediment, debris, structural condition	Annually, cleaned at 40% sump capacity	☐
Sediment/Soil Stockpiles (sand, gravel, topsoil) – tarped/contained, no tracking	Weekly	☐
General Grounds / Loading Docks – check for leaks, debris, or uncontrolled runoff	Weekly	☐

APPENDIX 2 – SOP COMPREHENSIVE SITE INSPECTION FORM

DATE:
INSPECTOR'S NAME

Areas/Items included in Comprehensive Site Inspection Program	***Inspection Tasks***	***Check if inspected. If necessary, add notes and applicable corrective actions, including the date corrective actions were completed.***
Aboveground Storage Tanks (ASTs) – Main Campus & Golf Course	Inspect for structural integrity, leaks, hoses, secondary containment condition; confirm. fueling is attended; check spill kits.	☐
Chemical Storage Areas – Custodial closets, Golf Course chemical building	Inspect containers for labels, seals, secondary containment, and housekeeping; verify spill kits stocked.	☐
Dumpsters (all sites)	Check lids closed, no leaks/spillage, surrounding pavement clean.	☐
Bagged Salt Storage (indoors)	Confirm salt remains on pallets, dry, and covered.	☐
Vehicle Maintenance Areas – Main Campus, Sturrus	Inspect for leaks/spills, drip pans in use, containers closed, waste fluids properly stored.	☐
Loading Docks & Delivery Areas	Check for leaks during unloading; inspect drains for residues.	☐
Waste Storage (used oil, hazardous waste, dumpsters)	Confirm containers are labeled, closed, and intact; check for leaks and overfilled containers.	☐
Sediment/Soil Stockpiles	Inspect for tracking, erosion, or lack of cover/tarping.	☐
Catch Basins (51 total)	Inspect for sediment, debris, or illicit discharges; confirm cleaning if sump >40%.	☐
Inlets and Outfalls	Inspect for sediment, trash, leaves, or signs of pollutants leaving the site.	☐
General Grounds	Inspect for spills, uncontrolled runoff, litter, or other exposure. issues.	☐
Discharge Points	Inspect for evidence of pollutants, erosion, staining, or abnormal flow.	☐

APPENDIX 3 – Pollution Prevention/Good Housekeeping Employee Training Completion Form

DATE OF TRAINING SESSION:
NAME OF TRAINER:
SOP TRAINING TOPICS COVERED DURING THE SESSION:

- How to prevent pollution from entering storm drains.
- Good housekeeping practices for daily tasks.
- Safe handling, storage, and disposal of materials.
- What to do if a spill or leak happens.
- Why stormwater management is important for our facilities and community.

Facility personnel receive Pollution Prevention/Good Housekeeping training at least once per permit cycle and within the first year of hire for new employees.

ATTENDEES NAME	SIGNATURE:

This form and its contents are subject to the Freedom of Information Act and may be released to the public.

APPENDIX 4 – ENFORCEMENT ACTION TRACKING LOG

DATE OF COMPLAINT / OBSERVATION: _____
SOURCE OF COMPLAINT (staff, student, public, inspection): _____
INSPECTOR / INVESTIGATOR NAME: _____

Violation Type	Description of Noncompliance	Initial Response / Investigation Date	Corrective Action Required	Responsible Party	Enforcement Action Taken	Follow-Up Inspection Date	Status / Resolution Date
☐ Illicit Discharge					☐ Written Notice ☐ Stop Work ☐ Cease & Desist ☐ Cost Recovery ☐ Other: ___		
☐ Spill / Release					☐ Reported to EGLE ☐ Contractor Cleanup ☐ Cost Recovery		
☐ Post-Construction O&M					☐ Written Notice ☐ Contractor Action ☐ Cost Recovery		
☐ Facility BMP Violation					☐ Written Notice ☐ Stop Work ☐ Other: ___		

Escalation Timeline (if applicable):

☐ Second Notice of Violation issued (30 days) – Date: _____

☐ Formal Citation / Contractor Action (60 days) – Date: _____

☐ Cost Recovery / Lien Initiated – Date: _____

Inspector Signature: _____ Date: _____

SSM / Responsible Manager Signature: _____ Date: _____

APPENDIX 5 – DRY WEATHER SCREENING FIELD FORM

General Information

Date (s): _____
Structure ID: _____
GPS Coordinates/Address: _____
Inspector(s): _____
Pipe Size: _____

Material	Weather	Last Rain Event
☐ Reinforced Concrete Pipe (RCP) ☐ Polyvinyl Chloride (PVC) ☐ Steel ☐ High Density Polyethylene (HDPE) ☐ Other: _____	☐ Sunny ☐ Rainy ☐ Overcast ☐ Snow	☐ 48-72 Hours ☐ >72 Hours

Field Observations

Dry Weather Flow	Color	Vegetation
☐ No ☐ Yes, Constant ☐ Yes, Intermittent ☐ Trace, Insufficient flow to sample ☐ Submerged	☐ Clear ☐ Brown ☐ Gray ☐ Other _____	☐ None ☐ Algae ☐ Slime
Structure Condition	**Floatables**	**Odor**
☐ Good ☐ Fair ☐ Poor	☐ Sewage ☐ Suds ☐ Petroleum Sheen ☐ Bacterial Sheen	☐ Sewage ☐ Petroleum ☐ Detergent

Sediment Accumulation		
☐ No ☐ Yes ☐ Needs Cleaning	☐ Trash ☐ None ☐ Other _____	☐ Rotten Egg ☐ None ☐ Other_____

Field Screening

Date (s): _____

Parameters	Action Level	Results
☐ **pH**	<6.5 or >9.0	
☐ **Temperature**	N/A	
☐ **E. coli**	>1,000 cts/100ml	
☐ **Ammonia**	>1.0 mg/l	
☐ **Surfactants**	>0.5 mg/l	
☐ **Other**		
☐ **Other**		

Source Investigation

- Sewer shed Investigation Conducted: ☐ Yes ☐ No
- Land Use Type**:** ☐ Residential ☐ Commercial ☐ Industrial
- Televised Investigation Conducted: ☐ Yes ☐ No
- Dye Test Conducted (Note**:** Inform EGLE-WRD if performing dye testing): ☐ Yes ☐ No
- Further Investigation Required: ☐ Yes ☐ No

Illicit Discharge Identified: ☐ Yes ☐ No

- Date Identified: _____
- Date Responsible Party Notified: _____
- Date Elimination Required: _____
- Date Eliminated: _____

Illicit Connection Identified: ☐ Yes ☐ No

- Date Identified: _____
- Date Responsible Party Notified: _____
- Date Elimination Required: _____
- Date Eliminated: _____

Enforcement Action Taken: ☐ Yes ☐ No

APPENDIX 6

Illicit Discharge Elimination Program Enforcement Mechanism

1. Purpose and Commitment

Muskegon Community College (MCC) is committed to protecting Michigan's surface waters by preventing illicit discharges to the stormwater conveyance system located on college property. This policy establishes procedures and enforcement mechanisms necessary for compliance with:
- MCC's Municipal Separate Storm Sewer System (MS4) permit
- Part 31 of Michigan's Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended
- The federal Clean Water Act

This policy serves as MCC's official Regulatory Mechanism for illicit discharge detection and elimination.

2. Applicability

This policy applies to:
- All MCC-owned and operated property, buildings, parking lots, athletic fields, ditches, and drainage systems
- All faculty, staff, students, contractors, vendors, and visitors while on college property.

3. Definitions

Stormwater: Runoff from precipitation events including rain, snowmelt, or ice melt.
Illicit Discharge: Any discharge to the stormwater system that is not composed entirely of stormwater, unless specifically exempted.
Illicit Connection: Any connection (direct or indirect) that conveys non-stormwater discharges into the stormwater system.
Stormwater System: All College-owned catch basins, storm drains, ditches, swales, retention/detention systems, and outfalls that convey stormwater to waters of the State.

Allowable non-stormwater discharges (if identified as not significant contributors to violations of Water Quality Standards) include:

- Water line flushing and discharges from potable water sources
- Landscape irrigation runoff, lawn watering runoff, and irrigation waters
- Diverted stream flows and flows from riparian habitats and wetlands.
- Rising groundwaters and springs
- Uncontaminated groundwater infiltration and seepage
- Uncontaminated pumped groundwater (excluding cleanups requiring NPDES permits)
- Foundation drains, crawl space pumps, footing drains, and basement sump pumps.
- Air conditioning condensation
- Waters from noncommercial car washing.
- Street wash water

- Dechlorinated swimming pool water from single, two, or three-family residences (note: MCC-operated pools may not discharge without NPDES authorization from EGLE)
- Firefighting Activities not considered to be a significant source of pollution.

4. Prohibition of Illicit Discharges

- No person shall discharge, cause, or allow the discharge of pollutants, wastewater, oils, chemicals, hazardous materials, or any non-stormwater substance into the MCC stormwater system.
- MCC prohibits illicit connections, whether permanent or temporary, that allow non-stormwater to enter the storm system.

5. Authority to Inspect and Investigate

- MCC Physical Plant Department, Environmental Health & Safety (EHS), or designated personnel may enter any MCC facility, job site, or contractor-controlled space for inspection of practices impacting stormwater.
- MCC may conduct dry-weather screening, dye testing, smoke testing, or other methods to detect illicit discharges or connections.
- Suspected violations may be referred to local municipalities or EGLE as necessary.

6. Enforcement and Penalties

Violations of this policy will result in corrective actions as outlined below:
- Employees: Retraining, corrective measures, and/or disciplinary action under MCC HR policy.
- Students: Disciplinary action under the Student Code of Conduct.
- Contractors/Vendors: Enforcement through contract language, including stop-work orders, cost recovery for cleanup, or termination of contract.
- Visitors: Removal from MCC property and referral to local law enforcement if necessary.

MCC reserves the right to recover all costs incurred for cleanup, investigation, and enforcement from the responsible party.

7. Corrective Actions

- Illicit discharges must be eliminated immediately upon discovery.
- Responsible parties must remediate affected areas, prevent recurrence, and cooperate fully with MCC staff.
- If a party fails to act, MCC may take corrective action directly and seek reimbursement.

8. Reporting Procedures

- All suspected illicit discharges or connections must be reported to the MCC Physical Plant Department immediately.
- Reports may be made by phone, email, or anonymous hotline submission.
- MCC staff are required to report observed spills or illicit discharges as part of their job duties.

9. Training and Awareness

- MCC will provide regular IDEP training to staff, contractors, and students as appropriate.
- Educational materials (signage, posters, and outreach) will be posted on campus to raise awareness.
- Annual refreshers will be required for custodial, grounds, and maintenance staff.

10. Effective Date and Adoption

This policy is adopted by Muskegon Community College and shall remain in effect until modified or rescinded. It constitutes the College’s enforceable Regulatory Mechanism for illicit discharge elimination, meeting the requirements of the MS4 stormwater permit.