CARROLLTON SCHOOL DISTRICT MUNICIPAL OPERATIONS AND MAINTENANCE ACTIVITIES

Overview

The EGLE NPDES Phase II MS4 Discharge Permit Application requires a procedure for assessing the applicant's operation and maintenance activities for the potential to discharge pollutants to surface waters of the state. The assessment shall identify all pollutants that could be discharged from each applicable operation and maintenance activity and the BMPs being implemented or to be implemented to prevent or reduce pollutant runoff.

This inventory will be updated annually as facilities add/remove BMP to address new and existing operation and maintenance activities.

The procedure shall include assessing the following municipal operation and maintenance activities if applicable:

- Driveway, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)
- Cold weather operations (e.g., plowing, sanding, application of deicing agents, and snow pile disposal)
- Vehicle washing and maintenance of school district-owned vehicles (e.g., school bus, pickups, tractors, lawn care equipment, other)
- Managing vegetative properties

The Carrollton School District is responsible for parking lot and sidewalk maintenance, cold weather operations of snow plowing and snow pile disposal, and vehicle washing and maintenance and managing vegetative properties. All the other listed municipal operation and maintenance activities do not apply. Please see Table 1 on the next page for a list of Carrollton Schools' Operation and Maintenance Activities, pollutants that could potentially be discharged, the pollution potential and the BMPs implemented to prevent and/or reduce pollutant runoff.

Table 1. Operation and Maintenance Activities

Municipal Operation and Maintenance Activity	Pollutants that could be Discharged	Pollution Potential (High, Med., Low)	BMPs Implemented to Prevent and/or Reduce Pollutant Runoff
Driveway, Parking Lot and Sidewalk Maintenance	Sediments, debris deicing agents, vehicle fluids	Medium	Catch Basin (CBs) sumps, vegetation buffers, sweeping as needed, spill cleanup
Cold Weather Operations – Snow Plowing and Pile Disposal	Debris and pollutants from the road, deicing agents, sediment.	Medium	Plowing and staging snow piles on vegetation adjacent to the paved surface away from CBs, or drains, maintaining vegetated buffers. Use of deicers is minimized and they are only used in key areas for safety concerns.
Vehicle Maintenance	Debris and automotive fluid from vehicles	Low	All CSD owned vehicles are maintained at the CSD Bus Garage.
Managing Vegetative Properties	Grass clippings, pesticides, fertilizers (if used)	Low	Education of staff to keep grass clippings away from CBs. Mow high when possible, manage vegetative buffers by drains and in detention basins, seed bare areas. If spraying either contract out or have USDA Certified staff do spraying. Fertilizers must have no or low phosphorus and soil tested before applications. Use mulch for erosion prevention.

Parking lot and sidewalk maintenance are performed on an as needed basis. Any and all work shall conform to Part 91 requirements for SESC. It is noted that public educational institutions must meet construction standards dictated by the State of Michigan and that all pertinent state building codes and necessary permits for construction must be adhered to or the state will not issue a permit to construct for the school district.

Carrollton Schools perform snow plowing and snow pile removal on its properties on an as needed basis. Snow is piled on school property in large vegetated areas adjacent to the paved surfaces as necessary. Fully up-to-date equipment capable of completing the work is used according to the manufacturers' operating instructions and to protect water quality.

The Carrollton Schools' maintenance staff is responsible for minor vehicle maintenance. This is done on an as needed basis. Maintenance is performed outside, any runoff is directed toward a vegetated area with no outlet, away from any catch basins onsite.

Vegetated properties managed by the Carrollton Schools' maintenance staff will use the best management practices as described in their standard operating procedures manual for building and grounds maintenance.

Updating/revising the prioritization is annually following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface, or within 30 days of identifying a need to revise a priority level.

Measurable Goals

- Quantifiable estimates when sweeping is done.
- Amount of deicers used per year.
- Conditions of parking lots and sidewalks at the end of each year.