

Thomas Township

Municipal Operations and Maintenance Activities

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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 BMPs to address new and existing operation and maintenance activities.

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

- Road, parking lot, and sidewalk maintenance (e.g., pothole, sidewalk, and curb and gutter repair)
- Bridge maintenance
- Right-of-way maintenance
- Unpaved road maintenance
- Cold weather operations (e.g., plowing, sanding, application of deicing agents, and snow pile disposal)
- Vehicle washing and maintenance of applicant-owned vehicles (e.g., police, fire, school bus, public works)
- Managing vegetative properties

Thomas Township is responsible for maintenance of parking lots and sidewalks, cold weather operations of snow removal from parking lots, driveways and sidewalks, managing vegetative properties, vehicle washing and maintenance. All of the other listed municipal operations and maintenance activities do not apply. Please see Table 1 on the next page for a list of Thomas Township's 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 Pile Disposal	Debris and pollutants from the road	Low	Snow is either plowed to the side of the parking lots or sidewalks and left in place or hauled to adjacent vegetated areas. (see below) Use of deicers is minimized and they are only used in key areas for safety concerns.
Vehicle Washing and Maintenance	Detergents and debris from vehicles	Low	Township owned vehicles/equipment are washed in their respective maintenance facilities.
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.

Cold weather operations in all of the areas within Thomas Township’s jurisdictional boundaries are performed on an as needed basis from the time the snow starts in the fall until the snowfall ceases in the spring (October – March). Fully up-to-date equipment capable of completing the work shall be used according to the manufacturers' operating instructions and to protect water quality.

Furthermore, there is no designated storage area for the snow that is removed. Snow is pushed to the sides of the parking lots, sidewalks or driveways on vegetation adjacent to the paved surface. The township’s primary concern in this matter is always the public's safety.

Vehicle washing and maintenance are performed on as as-needed basis. There is no set schedule or priority for these operations.

Vegetated properties managed by the Thomas Township 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 done annually following the construction of a new street, parking lot, or other applicant-owned or operated impervious surface, or annually if there is a need to revise a priority level.

Measurable Goals

- Number of complaints received each year.
- Pollutant runoff reduction on a yearly basis.