The MDEQ 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:

- 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

The City of Saginaw is responsible for road, parking lot, and sidewalk maintenance, bridge maintenance, right-of-way maintenance, any unpaved road maintenance, all cold weather operations, managing vegetative properties and washing and maintenance of city owned vehicles. The City of Saginaw has procedural standards for municipal operation and maintenance activities aimed at conducting activities as efficiently and safely as possible while preventing and/or reducing pollutant runoff. Please see Table 1 on the next page for a list of the City of Saginaw'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. Municipal Operations 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
Road, Parking Lot, and Sidewalk Maintenance	Debris and pollutants from the road, sediment, left over materials, vehicular petroleum- based products	Medium	Catch Basin (CBs) Sumps, Vegetated Buffers, Vegetated Open Channels/ Roadside Ditches, Sweeping as Needed, Spill Cleanup, Silt Fence, Stormwater Inlet Protection
Bridge Maintenance	Debris and pollutants from the road, sediment, left over materials, vehicular petroleum- based products, specialized deicers	Medium	Turbidity curtain (if applicable), Dust Control, Sweeping as Needed, Stormwater Inlet Protection
Right-of-Way Maintenance	Debris and pollutants from the road, sediment, left over materials	Medium	Sweeping/Dust Control, Silt Fence, Vegetated Open Channels/ Roadside Ditches, Stormwater Inlet Protection, Soil Management, Seeding, Mulching
Unpaved Road Maintenance	Debris and pollutants from the road, sediment, left over materials, vehicular petroleum- based products	Medium	Catch Basin (CBs) Sumps, Vegetated Buffers, Vegetated Open Channels/ Roadside Ditches, Spill Cleanup, Stormwater Inlet Protection
Cold Weather Operations	Debris and pollutants from the road, sediment, and runoff of deicing agents	Low	Plowing is done as to minimize scrapping of the pavement. Please see the PIPP for additional information concerning runoff of deicing agents.
Vehicle Washing and Maintenance	Detergents and debris from vehicles	Low	All City of Saginaw owned vehicles are washed at City 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.

The City of Saginaw prioritizes the cold weather operations of snow removal of its roads based on the volume of traffic and on a time permitting basis. The highest priority roads for snow removal are state trunk line roads (I-675, M-13, M-58, M-46, M-84, and M-81), bridges, major streets (such as Michigan Ave., Court St, Genesee Ave., Brockway Rd., and Hess Ave.), and emergency routes. Cold weather operations are paved on local roads only when these high priority areas have been completely taken care of.

All these areas within City of Saginaw's jurisdictional boundaries are snow plowed on an as needed basis from the time the snow starts in the fall until the snowfall ceases in the spring (October 1st-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 roads and disposed of always taking the public's safety as its primary concern.

Rock salt is used for deicing roads during inclement weather conditions where ice and snow can create unsafe driving conditions. Distribution of the material to the roads is by truck with a calibrated broadcaster mechanism. Procedures are in place to minimize the use of the deicers; however public safety is the primary objective in de-icing operations.

Road, bridge, parking lot, sidewalk, right-of-way maintenance, and 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 City of Saginaw 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.

A location map of the local and primary roads that correlate with the priority schedule for cold weather operations of snow plowing and removal within the City of Saginaw's jurisdictional boundary limits can be seen in the storm sewer system map. Please see Table 2, below, for a list of prioritization and frequency of City of Saginaw's cold weather operations of the snow plowing, removal and de-icing schedule.

Table 2.Street Plowing/Removal and De-icing Priority and Frequency

Street/Location	Priority Ranking (Low, Medium, High)	Frequency and Timing
State Trunk lines (I675, M13, M58, M46, M84, and M81)	High	~1st of October-March (Plowed when deemed necessary-on an as needed and time permitting basis.
Bridges over Saginaw River	High	~1 st of October-March (Plowed when deemed necessary- on an as needed and time permitting basis.
Major Streets (Michigan Ave., Court St., Genesee Ave., Brockway Rd., and Hess Ave.)	Medium	~1 st of October-March (Plowed when deemed necessary- on an as needed and time permitting basis.
Local Roads and Subdivisions	Low	~1 st of October-March (Plowed when deemed necessary- on an as needed and time permitting basis.

PRIORITIZATION OF SWEEPING

The City of Saginaw prioritizes the sweeping of its roads based on the volume of traffic, aesthetics and the priority listings, found below. Only the major streets in the City of Saginaw are swept. Sweeping is performed four times per year. Most of the streets in the City of Saginaw have catch basins that direct storm water runoff to a combined sewer system. The street sweeping debris is hauled to the City's Compost Site located just north of the City's Wastewater Plant - 2410 Veterans Memorial Pkwy, the street sweeping material is stock piled on a paved surface that drains to the combined sewer. When there is enough material stockpiled it is hauled away, currently by Waste Management, to Peoples Landfill located at 4143 E. Rathbun Road, Birch Run, MI.

Priority A (High):

Main Roads travelled along throughout the day.

Priority B (Medium):

Areas where commercial activities take place.

Priority C (Low):

These areas include residential areas that are medium density or single-family homes and have very low traffic. These roads are not swept by the City of Saginaw.

Table 3. Street Sweeping Priority and Frequency

Street/Location	Priority Ranking (Low, Medium, High)	Frequency and Timing
Major roads within the City of Saginaw's jurisdictional boundaries.	High	Four times per year

Measurable Goals:

- Number of complaints received each year.
- Pollutant runoff reduction on a yearly basis.
- Conditions of roads (paved and unpaved), parking lots and sidewalks at the end of each year.