



SASWA PROGRESS REPORT FOR 2020

HISTORY OF THE SASWA

In 1987, Congress amended the Clean Water Act (CWA) to require implementation of a national program for addressing storm water discharges from municipalities, industry, and construction sites. The program was designed in two phases. **Phase I** required National Pollutant Discharge Elimination System (NPDES) permits for storm water discharge from sources including **medium** and **large Municipal Separate Storm Sewer Systems (MS4s)** serving populations of 100,000 or more and several categories of industrial activity, including construction activity that disturbs five or more acres of land. **Phase II** of the storm water program requires permits for storm water discharges from specific **small** municipal separate storm sewer systems (MS4s) serving Urbanized Area (UA) populations of 50,000 or more, and construction activity generally disturbing between one and five acres.

The term MS4 does not solely refer to municipally owned storm sewer systems, but rather has a much broader application that can include, in addition to local jurisdictions, State departments of transportation, universities, local sewer districts, hospitals, school districts, military bases, and prisons. In 2012 the State of Michigan began defining an MS4 as pipe systems, surface conveyance systems and roadside drainage. Open county or agricultural drains are considered “waters of the state”.

Based upon the 2000 Census Bureau information, the following municipalities in Saginaw County automatically were designated as an Urban Area, and therefore were required to secure a National Pollutant Discharge Elimination System permit by March 10, 2003.

Buena Vista Charter Township
Bridgeport Charter Township
Saginaw Charter Township
Spaulding Township
Carrollton Township
City of Zilwaukee
Thomas Township

Saginaw County Public Works Commissioner
City of Saginaw
Tittabawassee Township
Kochville Township
James Township
Saginaw County Road Commission

State agencies in Saginaw County, such as the Michigan Department of Transportation and Department of Corrections obtained permits through their parent organizations and have permits in place for their locations throughout the state. Birch Run Township, part of the Flint Urbanized Area, opted to not join the Saginaw Area Storm Water Authority (SASWA).

School districts located within the Urbanized Areas were also required to obtain an NPDES permit by March 10, 2003. The school districts that were located within the UA are as follows:

City of Saginaw Schools
Saginaw Township Schools
Carrollton Township Schools
Bridgeport-Spaulding Township Schools
Swan Valley Schools
Buena Vista Schools – **No longer a school district**
Freeland Schools
Saginaw Intermediate School District

Additionally, Saginaw Valley State University became a member of the SASWA based on the Urbanized Area encompassing the campus in Kochville Township.

The former Michigan Department of Environmental Quality (MDEQ), now Michigan Department of Environment, Great Lakes, and Energy (EGLE) had to develop criteria for school districts with campuses that were not entirely within the UA. Based on the definition developed, all school districts listed above were inspected and the following school districts were eliminated from having to obtain a permit based on the 2000 census: *(NOTE: this changed with the 2010 Census Bureau and may change when the 2020 census data is completed)*

- Freeland Schools – Only one building in the UA, until the 2010 census; they have now opted to be nested under Tittabawassee Township’s Permit.
- City of Saginaw Schools – All schools are within a combined sewer district and under a City permit.

Other changes which occurred based on either court rulings or census changes are as follows:

Based on a lawsuit filed and won by Comstock and Kalamazoo Townships, if a township’s municipal buildings are not within an Urbanized Area and no other municipal properties with a dendritic MS4 are in the Urbanized Area, then the township is exempt. This ruling allowed James, Spaulding, and Birch Run Townships to be removed from the permit list. With the release of the 2010 Census Bureau urbanized area, the same situation occurred for Kochville Township and a letter was provided to the then MDEQ to rescind their permit. This may change in the next census of 2020.

The purpose of the Saginaw Area Storm Water Authority (SASWA) is to provide guidance to participating members and provide a method to share in some of the associated costs. Each participating community is responsible for costs that do not benefit the Authority as a whole. The authority was formed under Public Act 230 of 1955 and was modeled after the Mid-Michigan Waste Authority and Northwest Utilities Authority.

For additional information about the SASWA and its programs, please use SASWA’s website at:

www.saswa.org

2020 PROGRESS REPORT

The Saginaw Area Storm Water Authority (SASWA) held three General Board Meetings and four Executive Board Meetings in 2020. The new NPDES Individual MS4 Permit Application submittal from April 1, 2015 is still being reviewed by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) for some members. The review the SASWA has been completed by the EGLE and the SASWA has replied to the EGLE's comments; these permits will soon be up for Public Notice by the EGLE. The EGLE will "Public Notice" each member's permit for a period of 20 days for public comment via the MiWaters online database system (discussed below). After the public notice period is complete, the EGLE will then issue a permit to each member of the SASWA. The permit will be valid for five-plus years, dependent upon when it is issued. The members listed below has completed the public notice period and have had a permit issued. The issuance for all remaining applications will continue in 2021 as stated by an EGLE representative.

Members with Issued Permits

- Saginaw Charter Township
- City of Saginaw
- Bridgeport Charter Township
- Thomas Township
- Saginaw Intermediate School District
- Saginaw Valley State University
- Swan Valley Public Schools
- Tittabawassee Township
- Bridgeport Spaulding Public Schools
- City of Zilwaukee

In 2015, the SASWA reported that a SAW Grant was applied for in 2013 to offset the preparation costs of the MS4 permit applications. The grant was tentatively scheduled to be issued in 2018. However, the SASWA had its grant awarded in late 2016. The SASWA has received a \$92,500 SAW Grant to assist with the application process; a total of \$83,250 has been awarded with a \$9,250 cash match (10%) by the SASWA (this match was accounted for in the budget for 2017). In 2017, two separate disbursement requests were submitted and received. The first disbursement was for \$9,070.87 and the second disbursement was for \$58,676.63; the remaining funds, \$15,502.50, were received in 2020 with the completion of the SAW grant.

The SASWA still maintains a presence on the EGLE's MS4 Implementation Team (MIT) which oversees the administration of the new Individual NPDES Stormwater permits. The SASWA is the only authority represented on the committee. The consultant also represents numerous other municipal and county clients around Michigan to the EGLE. We are in an enviable position to have a direct voice to the EGLE on this committee. It has not met for the past five years with the new permit application process taking up a substantial amount of the EGLE's time. A letter was sent to the MIT in February 2020 from the SASWA detailing the concerns with the implementation of the new permits and lack of communication and requesting the MIT meet to discuss issues. The MIT did not meet after the letter was sent, rather the EGLE MS4 Program Coordinator came and spoke at the special SASWA Executive meeting in July.

The SASWA continues to utilize the EGLE's online database management system for submitting permit applications, compliance reporting for permits, and a tracking system. There will be a new progress reporting format for members to utilize beginning in 2021. It should be noted that the MiWaters system is a public system; the general public will be able to view documents that are submitted to the EGLE in which are deemed a "public" document. Most of the items produced by the SASWA for implementation of its best management practices will be able to be viewed by the public. These same public documents will be available on the SASWA website upon their final approval.

EGLE Audits of SASWA Members

In 2020 there were two EGLE audits performed for the SASWA, the Saginaw County Road Commission (SCRC) and the Saginaw County Public Works Commission (SCPWC). The SCRC was audited on three of the six minimum measures: Illicit Discharge Elimination Program (IDEP), Construction Stormwater Runoff Control Program (CSWRCP), and Pollution Prevention and Good Housekeeping Program (PP & GH). After the audit, EGLE requested additional information and issued a violation notice, which the Road Commission promptly responded to. The EGLE completed a desktop audit for the SCPWC which covered the IDEP, CSWRCP, Post Construction Stormwater Runoff Program, and PP & GH. The SCPWC received a violation notice as well and responded accordingly in MiWaters. Audits for SASWA members will continue into 2021 as the focus shifts away from the permit application submissions.

Public Education

The COVID-19 pandemic has impacted stormwater education opportunities throughout the state. The members of the SASWA have been largely unable to use the public display board in 2020. With the absence of outreach events, SASWA has emphasized their online resources and educational content for the public. Content available from the SASWA website includes information on how to protect the watershed with concentrations on, Lawn Care, Soil Testing, Pet Waste, and Car Washing. Additional information and activities are available for Homeowners', Commercial Property Owners', and Children. The SASWA has also drafted a memo to EGLE to address the changes in outreach plan, as a result of the pandemic, from those originally submitted with the permit applications.

SASWA Website

The SASWA launched a new website, www.saswa.org, during the 2019 calendar year and has been continuing to improve the content and accessibility throughout 2020. Public notice documents, educational materials, and stormwater management plans are all available on the website. Training for SASWA members is also available. If you have any suggestions for how to improve the SASWA website, please reach out to your SASWA representative or contact us directly through the SASWA website.

Community Newsletters/ Social Media Postings

If you have a community newsletter or social media page and would like to assist the SASWA to meet its Public Education goals in 2021, please let your SASWA representative know and they will obtain articles for placement in community newsletters or on community social media pages. This will also help communities with their future stormwater audits.

University Student Sponsorship

This program was placed on hold during 2018 and 2019 due to budget concerns. We hope to begin this program again in 2021. We feel that this collaboration with our regional University (and member of SASWA) will help in the future and continue to provide a real-life application of the student's chosen field of study and the opportunity to see what careers are available in the Great Lakes Bay Region. SASWA is looking into the possibility of coordinating E. coli testing efforts with SVSU in 2021.

Pollution Prevention and Good Housekeeping Efforts

In 2019, the SASWA hosted two training sessions, morning and afternoon, on March 28th for public works, grounds maintenance, building maintenance and custodial staff who may come into contact with stormwater during the course of their work activities (i.e. anything outside). The training sessions were completed in a manner so staff could be rotated and not be away from work the entire day. The following topics were covered during the training sessions with the same material covered at each session: NPDES Phase II

overview including the six minimum measures, IDEP and Dry Weather Screening Training, Spill Prevention and Clean-up, Construction Site Best Management Practices (BMPs), and Pollution Prevention and Good Housekeeping. In addition, pre-and post-tests were given at each training session and the results were compiled as a unit of measurement for comparison purposes. These educational sessions are **required** as part of the NPDES MS4 permit, and staff has attended these sessions in the past.

Due to the pandemic and the limits on public gatherings, the SASWA website was updated to include staff training videos to comply with this permit requirement. Upcoming training dates for any new staff for public works, grounds maintenance, building maintenance, and custodial staff who may encounter stormwater during the course of their work activities will be determined once all SASWA member permits have been issued and it is safe to hold the trainings in person.

Another very successful clean-up effort which removed a substantial amount of sediment from city, county and township paved roads and roadside storm sewers was reported by the Saginaw County Road Commission, City of Saginaw and others. In 2018 the workers from the Road Commission removed 308 cubic yards (519 tons) of sediment with their street sweeping program. They also cleaned over 330 catch basins, removing another 4 tons of sediment. In 2019 the Road Commission was working with EGLE staff to develop a new inspection and cleaning schedule that will be implemented during the upcoming permit cycle. The Saginaw County Road Commission began their Catch Basin Inspection Program in 2020 as part of the approved permit application. This program has helped to proactively determine areas of concern and to address any catch basin maintenance issues before they get out of hand. The SCRC will continue this program throughout this permit cycle. The City of Saginaw continues its programs of cleaning materials from the restrictor plates in the street catch basins, street sweeping program, and catch basin cleaning programs.

The sediment removed from street sweeping and catch basin cleaning usually has pollutants attached to it such as heavy metals like lead, chromium, zinc, aluminum, petroleum products, and nutrients such as phosphorus and nitrogen. These materials have an effect on our water resources. For example, the 523 tons of sediment from street sweeping and catch basin cleaning are estimated to contain 445 pounds of phosphorus. Phosphorus is a limiting nutrient in freshwater, so if it becomes available in freshwater, aquatic plants and algae grow at a very rapid rate. One (1) pound of phosphorus can yield up to 10,000 pounds of algae and aquatic vegetation. This algae and aquatic vegetation, when it dies off, is the source of organic muck in lakes and rivers; most of this goes out to Saginaw Bay. **The street sweeping program of the Road Commission of Saginaw County has helped eliminate the growth of over 2,223 tons of algae and nuisance aquatic plants in our region's water resources, ultimately the Saginaw Bay.** These efforts are helping us preserve our water resources. This also helps reduce the probability of having harmful algal blooms in Saginaw Bay.

The SASWA had a team from Spicer Group inspect catch basins on township, school district, and county properties in the Urbanized Area of Saginaw. All structural storm water controls scheduled for inspection in 2019 were completed, including those on Saginaw Valley State University's campus. The approved catch basin inspection program for all SASWA members apart from the SCRC and SVSU, is scheduled to begin in 2021. IDEP dry weather screening was also done during 2019 with follow up inspections completed in 2020. Of the 437 outfalls, 292 were inspected. The remaining outfalls will be screened in the coming years. The inspection team consisted of two interns from Michigan Technological University.

The SASWA had four reports of spills or illicit discharges in 2020 and two potential illicit discharges discovered during dry weather screening. The first incident was the release of diesel fuel from a punctured tank. The truck company responsible for the incident called Enviro-Serve and all material was contained and cleaned up. The second incident involved the back of a homeowner sanitary line that then drained to the sump pump and out to the catch basin. The problem was resolved by City Sewers and the effected catch

basins and storm system were pumped out and material was properly disposed of by City Sewers. On July 27th, Spicer Group was made aware of a potential illicit discharge to the storm system on Davis Road. The discharge was determined that cooling water was entering the Saginaw County Road Commission (SCRC) MS4 and ultimately discharging to the Century Tile Drain. Spicer staff was sent out to obtain water quality measurements and site photos. EGLE staff at the Saginaw Bay Region office were contacted, and it was determined that the site in question does not have an NPDES permit for the discharge. Additional follow up with the company is ongoing. The fourth spill was the result of a transformer fire that resulted in the spill of transformer oil. Most of the oil was cleaned up before reaching the nearest catch basin and the cleanup was completed by Bierlein Environmental. The illicit discharges found during dry weather screening were to the SCRC and SCPWC systems. Coordination to find the source and eliminate these discharges is in process.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Rick Hopper", is written over a horizontal line.

Rick Hopper
Chair - SASWA