

**OAKLAND COUNTY MS4**  
**Oakland County Facilities Management (OCFM)**  
**Municipal Operations and Maintenance Activities Assessment**  
**MARCH 2025**

**I. POLICY:**

The purpose of this policy is to establish the procedure for assessing the potential for pollutants from operation and maintenance activities at OCFM-owned or operated facilities that discharge to surface waters of the state.

**II. BACKGROUND:**

The EGLE NPDES Phase II Stormwater Discharge Permit requires a procedure for identifying operation and maintenance activities that have 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.

**III. OPERATION AND MAINTENANCE ACTIVITIES ASSESSMENT:**

The operation and maintenance activities that are conducted at or within OCFM facilities and with a discharge of stormwater to surface waters of the state have been evaluated for the potential to discharge pollutants such as:

- sediment,
- nutrients,
- metals,
- hydrocarbons,
- pesticides,
- chlorides,
- trash,
- bacteria, or
- other site-specific pollutants that could be discharged from those activities are identified.

The BMPs that are implemented to reduce pollutant runoff for each operation and maintenance activity are identified in the table below.

OCFM Operation and Maintenance Activity	Potential Pollutants that could be Discharged	BMP's Implemented to Reduce Pollutant Runoff
Catch Basin Cleaning	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Nutrients</li> <li>• Metals</li> <li>• Hydrocarbons</li> <li>• Trash</li> <li>• Bacteria</li> </ul>	<ul style="list-style-type: none"> <li>• Structures cleaned when sumps are no more than 50% full. All vactored wastes are properly disposed of.</li> </ul>
Roadway, Parking Lot and Sidewalk Maintenance	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Metals</li> <li>• Hydrocarbons</li> <li>• Trash</li> </ul>	<ul style="list-style-type: none"> <li>• Street Sweeping</li> <li>• Catch Basin Cleaning</li> <li>• Stockpile materials away from storm drain inlets and catch basins</li> </ul>
Right-of-Way Maintenance (ditching, trash pickup, etc.)	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Nutrients</li> <li>• Metals</li> <li>• Hydrocarbons</li> <li>• Chlorides</li> <li>• Trash</li> <li>• Bacteria</li> </ul>	<ul style="list-style-type: none"> <li>• Ditch maintenance performed during dry weather and exposed soils stabilized with hydroseed or mulch blankets to prevent/minimize erosion</li> <li>• Cleaning of campus performed daily</li> </ul>
Unpaved Road and Trail Maintenance	<ul style="list-style-type: none"> <li>• Sediment</li> </ul>	<ul style="list-style-type: none"> <li>• Stabilize exposed soils, especially near steep slopes, to prevent erosion</li> </ul>
Cold weather Operations: - Plowing - Salt Brine Application - Salt Application - Snow Pile Disposal	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Metals</li> <li>• Hydrocarbons</li> <li>• Chlorides</li> </ul>	<ul style="list-style-type: none"> <li>• Routinely calibrate spreaders</li> <li>• Minimize the use of salt and/or sand to the maximum extent practicable</li> <li>• Integrated Contingency Plan in place that describe salt storage BMPs</li> <li>• Snow piles store away from storm drains and waterways</li> </ul>
Vehicle Washing and Maintenance	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Nutrients</li> <li>• Metals</li> <li>• Hydrocarbons</li> <li>• Chlorides</li> <li>• Trash</li> <li>• Bacteria</li> </ul>	<ul style="list-style-type: none"> <li>• Trucks and vehicles are taken to a commercial carwash or cleaned indoors where wash water discharges to the sanitary sewer system</li> </ul>
Landscape Maintenance	<ul style="list-style-type: none"> <li>• Sediment</li> <li>• Nutrients</li> <li>• Trash</li> </ul>	<ul style="list-style-type: none"> <li>• Implement Integrated Pest Management (IPM) program; maintain staff certifications as Certified Pesticide Applicators (Full time employs certified) <ul style="list-style-type: none"> <li>○ If contractors are used for pesticide applications, the Oakland County procurement process requires contractors to be certified pesticide</li> </ul> </li> </ul>

OCFM Operation and Maintenance Activity	Potential Pollutants that could be Discharged	BMP's Implemented to Reduce Pollutant Runoff
		<p>applicators through MDARD.</p> <ul style="list-style-type: none"> <li>• Re-establish certification in Michigan Turfgrass Environmental Stewardship Program (MTESP)</li> <li>• Utilize the use of native plants and rain gardens to improve water quality and create habitat</li> <li>• Manage invasive plant species to improve water quality and wildlife habitat</li> <li>• Utilize Phosphorus-free fertilizers and maintain no-mow and fertilizer-free buffer zones adjacent to waterways</li> <li>• Ensure grass clipping are blown from roadways and curb and gutter areas</li> </ul>

This assessment will be updated/revised within 30 days following the addition/removal of BMPs to address new and existing operation and maintenance activities.