

City of Oak Park Storm Water Management Plan

STANDARD OPERATING PROCEDURE ENFORCEMENT RESPONSE

PREPARED FOR:

THE CITY OF OAK PARK
14000 OAK PARK BOULEVARD, OAK PARK, MI 48237



UPDATED June 2025

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a procedure for Enforcement Response to address violations of the ordinance(s) or regulatory mechanism(s) identified in the Stormwater Management Plan.

SECTION B – GENERAL PENALTY

Chapter 1.25 of Title 1 General Provision of the City of Oak Park Code of Ordinances defines the penalties levied by the City for ordinance violations. The section specifically defines penalties for misdemeanors.

B.1 Chapter 1.25 – General Penalty

“(a) Unless another penalty is expressly provided by this Code for any particular provision or section, every person convicted of a violation of any provision of this Code or any rule, regulation or order adopted or issued in pursuance thereof shall be punished by a fine of not more than \$500.00 and costs of prosecution or by imprisonment for not more than 90 days, or by both such fine, costs and imprisonment in the discretion of the court. Each act of violation and every day upon which any such violation shall occur shall constitute a separate offense.

(b) The penalty provided by this section, unless another penalty is expressly provided, shall apply to the amendment of any section of this Code, whether or not such penalty is reenacted in the amendatory ordinance.

(c) The penalty shall be in addition to the abatement of the violating condition, any injunctive relief or revocation of any permit or license.”

SECTION C – IDEP ENFORCEMENT RESPONSE PROCEDURE

The enforcement response procedure related to IDEP enforcement can be found in the River Rouge Collaborative Illicit Discharge and Elimination Plan (Appendix C).

SECTION D – POST CONSTRUCTION STORMWATER RUNOFF CONTROL ENFORCEMENT RESPONSE PROCEDURE

The enforcement response procedure related to the site plan approval application process, implementation of the approved site plan, long-term maintenance, and the enforcement thereof, can be found in Post Construction Stormwater Runoff Control Standard Operating Procedure.

SECTION E – PART 91 COUNTY ENFORCEMENT AGENCY

E.1 Part 91 Soil Erosion and Sedimentation Control 324.9121 – Violations; penalties.

“(1) A person who violates this part is responsible for either of the following:

(a) If the action is brought by a county enforcing agency or a municipal enforcing agency of a local unit of government that has enacted an ordinance under this part that provides a penalty for violations, the person is responsible for a municipal civil infraction and may be ordered to pay a civil fine of not more than \$2,500.00.

(b) If the action is brought by the state or a county enforcing agency of a county that has not enacted an ordinance under this part, the person is responsible for a state civil infraction and may be ordered to pay a civil fine of not more than \$2,500.00.

(2) A person who knowingly violates this part or knowingly makes a false statement in an application for a permit or in a soil erosion and sedimentation control plan is responsible for the payment of a civil fine of not more than \$10,000.00 for each day of violation.

(3) A person who knowingly violates this part after receiving a notice of determination under section 9112 or 9117 is responsible for the payment of a civil fine of not less than \$2,500.00 or more than \$25,000.00 for each day of violation.

(4) Civil fines collected under subsections (2) and (3) shall be deposited as follows:

(a) If the state filed the action under this section, in the general fund of the state.

(b) If a county enforcing agency or municipal enforcing agency filed the action under this section, with the county or municipality that filed the action.

(c) If an action was filed jointly by the state and a county enforcing agency or municipal enforcing agency, the civil fines collected under this subsection shall be divided in proportion to each agency's involvement as mutually agreed upon by the agencies. All fines going to the department shall be deposited into the general fund of the state.

(5) A default in the payment of a civil fine or costs ordered under this section or an installment of the fine or costs may be remedied by any means authorized under the revised judicature act of 1961, 1961 PA 236, MCL 600.101 to 600.9948.

(6) In addition to a fine assessed under this section, a person who violates this part is liable to the state for damages for injury to, destruction of, or loss of natural resources resulting from the violation. The court may order a person who violates this part to restore the area or areas affected by the violation to their condition as existing immediately prior to the violation.

(7) This section applies to an authorized public agency, in addition to other persons. This section does not apply to a county enforcing agency or a municipal enforcing agency with respect to its administration and enforcement of this part and rules promulgated under this part.”

SECTION F – ENFORCEMENT TRACKING

City will track all violations and issued permits. The following information will be collected and used for tracking records for each violation that is imposed by the City.

1. Name
2. Date
3. Location of the Violation (address, cross streets, etc.)
4. Business, Agency, Organization as applicable
5. Description of the Violation
6. Applicable Correspondence
7. Follow-up Actions
8. Key Dates
9. Descriptions of the City's Enforcement Response
10. Schedules for Achieving Compliance
11. Date the Violation was Resolved

SECTION G – PROCESS FOR REVISION

This procedure shall be reviewed every two years by the Stormwater Manager for any updates to streamline the requirements.

APPENDIX A – COLLABORATIVE PUBLIC PARTICIPATION/INVOLVEMENT PROGRAM (PPP)

Refer to ARC Collaborative PPP which was adopted and in effect till September 30, 2031.

Link to plan: [ARC PPP Plan](#)

APPENDIX B – COLLABORATIVE PUBLIC EDUCATION PROGRAM (PEP)

Refer to ARC Collaborative PEP which was adopted and in effect till September 30, 2031.

Link to plan: [ARC PEP Plan](#)

APPENDIX C – COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN (IDEP)

Refer to ARC Collaborative IDEP which was adopted and in effect till September 30, 2031.

Link to plan: [ARC IDEP Plan](#)

APPENDIX D – CONSTRUCTION STORMWATER RUNOFF CONTROL

STANDARD OPERATING PROCEDURE POST CONSTRUCTION STORMWATER RUNOFF CONTROL

PREPARED FOR:

THE CITY OF OAK PARK
14000 OAK PARK BOULEVARD, OAK PARK, MI 48237



June 2025

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the post-construction stormwater runoff control program to the maximum extent practicable. Post-construction stormwater runoff controls are necessary to maintain or restore stable hydrology in receiving waters by limiting surface runoff rates and volumes and reducing pollutant loadings from sites that undergo development or significant redevelopment.

SECTION B – ADOPTION OF COUNTY STANDARDS

The City of Oak Park intends to adopt the Oakland County Stormwater Management Standards. The City will review the updated Standards in April. Any necessary updates to these standards will be drafted and adopted by the City of Oak Park. Link to Oakland County Stormwater Management Standards: [Oakland County Stormwater Management Standards](#)
Link to Oak Park Stormwater Management Standards: [Stormwater Management](#)

SECTION C – MEASURABLE GOALS

To demonstrate the effectiveness of the post construction stormwater runoff control program, the following metrics will be tracked for reporting purposes:

- Number of stormwater site plan reviews requested and completed
- Number of maintenance violations of constructed BMPs
- Number of instances where the City had to undertake corrective measures

These metrics will be tracked over the reporting cycle that is specified in the City's Certificate of Coverage.

SECTION D – PROCESS FOR REVISION

This procedure shall be reviewed every two years by the Stormwater Manager for any updates to streamline the requirements.

STANDARD OPERATING PROCEDURE POLLUTION PREVENTION AND GOOD HOUSEKEEPING

GENERAL PROCEDURES

PREPARED FOR:

THE CITY OF OAK PARK
14000 OAK PARK BOULEVARD, OAK PARK, MI 48237



June 2025

SECTION A – PURPOSE

The Michigan Department of Environmental Quality (MDEQ) National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Phase II Stormwater Discharge Permit Application requires a description of current and proposed BMPs to meet the minimum control measure requirements for the Pollution Prevention and Good Housekeeping Program to the maximum extent practicable to prevent or reduce the discharge of pollutants from municipal facilities and operations.

SECTION B – FACILITY ASSESSMENT AND PRIORITIZATION

The City does not own or operate any facilities within their MS4 regulated area.

SECTION C – UPDATES AND PRIORITY REVISION

This inventory shall be updated within 120 days as facilities and structural stormwater controls are added, removed, or no longer owned or operated by the applicant. Priority level assessments shall be revised within 120 days prior to discharging stormwater at a new facility, or when the storage of materials, equipment, or vehicles changes at a facility.

SECTION D – MUNICIPAL INVENTORY AND ASSESSMENT

Structure ID	Structure Type	Location
CB 31-235	CATCH BASIN	JAMES AVE.
CB 31-236	CATCH BASIN	JAMES AVE.
CB 31-239	CATCH BASIN	JAMES AVE.
CB 31-240	CATCH BASIN	JAMES AVE.
CB 31-241	CATCH BASIN	MILLER AVE.
CB 31-242	CATCH BASIN	MILLER AVE.
CB 31-243	CATCH BASIN	MILLER AVE.
CB 31-244	CATCH BASIN	MILLER AVE.
MH 31-1R	MANHOLE*	GREENFIELD RD.
MH 31-2R	MANHOLE*	GREENFIELD RD.
MH 31-3R	MANHOLE*	GREENFIELD RD.
MH 31-4R	MANHOLE*	GREENFIELD RD.
MH 31-5RA	MANHOLE*	MILLER AVE.
MH 31-5R	MANHOLE*	MILLER AVE.
MH 31-6R	MANHOLE*	MILLER AVE.
MH 31-6RA	MANHOLE*	MILLER AVE.
MH 31-7R	MANHOLE*	MILLER AVE.
MH 31-8R	MANHOLE*	MILLER AVE./JAMES AVE.
MH 31-9R	MANHOLE*	MILLER AVE./JAMES AVE.
MH 31-10R	MANHOLE*	MILLER AVE./JAMES AVE.
MH 31-11R	MANHOLE*	MILLER AVE./JAMES AVE.
MH 31-16R	MANHOLE*	GREENFIELD RD.
MH 31-17R	MANHOLE*	GREENFIELD RD.
MH 31-18R	MANHOLE*	GREENFIELD RD.

MH 31-19R	MANHOLE*	GREENFIELD RD.
MH 31-20R	MANHOLE*	GREENFIELD RD.
MH 31-21R	MANHOLE*	GREENFIELD RD.
MH 31-22R	MANHOLE*	GREENFIELD RD.
MH 31-23R	MANHOLE*	GREENFIELD RD.
MH 31-24R	MANHOLE*	GREENFIELD RD.
MH 31-25R	MANHOLE*	GREENFIELD RD.
MH 31-26R	MANHOLE*	GREENFIELD RD.
MH 31-27R	MANHOLE*	GREENFIELD RD.

*Manhole lid has holes to allow water in

SECTION E – SITE SPECIFIC SOP FOR HIGH PRIORITY SITES

The City does not own or operate any high priority facilities within their MS4 regulated area.

SECTION F – CATCH BASIN MAINTENANCE PRIORITY

The City owns and operates eight (8) catch basins on James Ave and Miller Ave east of the intersections at Greenfield Road. The City also owns and operates twenty-five (25) storm manholes with holes in the lids on James Ave., Miller Ave., and Greenfield Road in the same area. James Ave. and Miller Ave. are paved residential roadways and are considered Low Priority. Catch basin inspections on James and Miller are completed and documented every five years. Information is available upon request.

Low Priority streets and catch basins have one or more of the following criteria:

- City-owned parking lots with no material storage or handling;
- Catch basins located within vegetated areas; and/or
- City-owned and maintained streets with low sediment accumulation.

Catch basins that are located on private property are not inspected, cleaned, or maintained by the City.

SECTION G – STREET SWEEPING PRIORITY

The James Ave. and Miller Ave. drainage area contributing to the catch basins and manholes included in the City’s MS4 are residential streets with low sediment accumulation rates and is considered Low Priority for street sweeping.

Low Priority – Residential streets or parking lots within the City that have minimal sediment accumulation rates.

Street sweeping program activities are not implemented under the following conditions:

- Street sweeping is not conducted on County or State roads
- Sweeping activities are not conducted during wet and inclement weather
- Street sweeping activities are not conducted on private streets or parking lots

SECTION H – SCHEDULE OF STREET SWEEPING AND CATCH BASIN INSPECTIONS

The frequency of street sweeping and catch basin inspections associated with each priority level is provided in **Table 2** below.

Table 2

Maintenance Activity	Priority Level – Schedule		
	High	Medium	Low
Street Sweeping	NA	NA	Monthly
Catch Basin Inspections	NA	NA	1x / 5 years

SECTION I – CATCH BASIN INSPECTION, MAINTENANCE, AND CLEANING METHODOLOGY

Catch basins are visually inspected during normal work activities or if a complaint is registered by a resident. A visual inspection of the structure will identify any structural defects which may include collapse, cracking, frame damage, pipe collapse, blockage, etc. and will be documented using a standardized form. Structural repairs are prioritized based on public safety concerns. During the inspection, if it is determined that the catch basin sump is 50% full of accumulated sediment and debris, it will be cleaned promptly. Catch basins will be serviced using a vactor truck to remove solids and liquids from the structure. At no time is the collected sediment and water allowed to be discharged back into the storm sewer system during the cleaning process. The City will maintain complete catch basin inspection and cleaning documentation for the City's eight (8) catch basins and twenty-five (25) manholes in the MS4 area and include this information in progress reports. Catch basins along Greenfield Road are to be inspected and cleaned by Oakland County.

SECTION J – STREET SWEEPING METHODOLOGY

The City DPW sweeps City-owned properties with Elgin Pelican or Global sweepers according to the manufacturer's operating instructions. All private street sweeping is performed by a contractor selected by the property owner. Collected sediment from street sweeping activities is disposed of as described in Section K. The City will maintain complete street sweeping documentation for the City's eight (8) catch basins and twenty-five (25) manholes located on James Ave., Miller Ave., and Greenfield Road and include this information in progress reports.

SECTION K – DISPOSAL OF COLLECTED MATERIAL

Collected material from street sweeping activities performed by the City are transferred to a drying bin at the City's DPW, where the underdrainage from the drying bins flows to the sanitary sewer. The wastes are then disposed of at a landfill. Collected material from catch basin maintenance and street sweeping completed by contractors are transferred to drying bins at each contractor's yard. The waste is then disposed of at landfills. The City is sometimes required to complete or sign waste manifests as the owner and generator of the waste.

SECTION L – OTHER STRUCTURAL STORMWATER CONTROLS

The City does not have any other structural controls that are owned or maintained by the City. In the event additional structural stormwater controls are constructed, this procedure will be

updated and revised to include the new controls within 120 days.

SECTION M – COLD WEATHER OPERATIONS

The City DPW field staff generally plows local streets and does not apply rock salt or other de-icing agents as part of our routine cold weather operations. Should an extreme circumstance occur and make the streets unpassable we will very sparingly "skip salt" on James Ave. and Miller Ave. whereby a small amount of salt is applied every 50 feet and relies on traffic to spread it out and make the roadway passable. Bulk storage of road salt is located at the DPW facility, 10600 Capital Avenue, Oak Park which is not within the regulated MS4 area. Salt storage and application training is performed annually to DPW staff. Staff has been trained to minimize any track-out from loading operations. Salt application vehicles are calibrated before the winter season.

SECTION N – ROAD MAINTENANCE OPERATIONS

Road, parking lot, and sidewalk maintenance activities include cold patching of surfaces that have been removed for water and sanitary line maintenance. These services are addressed by DPW field staff as determined in the field on an as needed basis. Materials are purchased in quantities as needed to reduce waste. Leftover materials are stored in designated stockpile areas that are not within the regulated MS4.

SECTION O – NEW APPLICANT OWNED FACILITIES

In the event the City acquires or constructs new structural stormwater controls, the design of these structures will comply with the stormwater standards that have been established by Oakland County. Site plans will be reviewed by the City, or its consultants, to ensure the appropriate standards are met.

SECTION P – CERTIFIED PESTICIDE APPLICATOR

The DPW department applies mosquito treatment as pesticides in the MS4 regulated area. The City does not apply sprayed pesticides within the MS4 regulated area.

SECTION Q – EMPLOYEE TRAINING

Employee training programs will be implemented to inform appropriate personnel at all levels of responsibility of safety, environmental impacts, and good housekeeping practices once per permit cycle, or as needed for new hires. The City participates in training opportunities that are made available by SEMCOG, Oakland County, Wayne County, and the Alliance of Rouge Communities and others as deemed appropriate. Employee training components for the City of Oak Park DPW Department includes:

Employees Trained	Training Description and Frequency
New Oak Park DPW Employees Training	Upon hire, employees will: <ul style="list-style-type: none"> • View the Municipal Storm Water Pollution Prevention Storm Watch training video. • Read and become familiar with the City’s SOPs. • Participate in a job shadow program where new staff are paired with an experienced staff member for 30 days.
All Oak Park DPW Field Employees <i>(once per permit cycle)</i>	<ul style="list-style-type: none"> • View the Municipal Stormwater Pollution Prevention Storm Watch training video. • Review proper materials storage and handling. • Review good housekeeping and pollution prevention practices. • Review examples of illicit discharges to the storm sewer system • Review City’s Spill Response Procedures
Key Staff	<ul style="list-style-type: none"> • Attendance of key staff at relevant training workshops by the Alliance of Rouge Communities, SEMCOG, or others, when available.

SECTION R – CONTRACT REQUIREMENTS AND OVERSIGHT

The contractors hired by the City to perform municipal operations that potentially impact stormwater are required to follow appropriate pollution prevention BMPs indicated in the City’s contract language. In cases where an outside contractor is hired to perform services that could impact stormwater, the contracting company will be required to follow appropriate pollution prevention BMPs. All work performed by outside contractors is monitored by City staff through daily observation to ensure quality of work, adherence to the specified contract language, and to ensure that potential impacts to stormwater are minimized.

Measurable Goals – To demonstrate the effectiveness of this procedure, the following metrics will be tracked for reporting purposes.

- Number of stormwater pollution related incidents pertaining to activities or work performed by the contractor.
- Number of incidents where the City required corrective action by the contractor

These metrics will be tracked over the reporting cycle that is specified in the City’s Certificate of Coverage.

SECTION S – COMPLAINT PROCEDURE

Complaints received by the public are logged by the City and then routed to the appropriate department for follow-up. Investigation into complaints routed to the DPW department are conducted within 24 to 48 hours after the complaint has been received by the City. At that time, the DPW will make a determination to correct any problems, or contact the responsible parties for appropriate action.

Measurable Goals – To demonstrate the effectiveness of this procedure, the following

metrics will be tracked for reporting purposes.

- Number of complaints routed to the DPW department for follow up.
- Number of incidents that prompted additional corrective actions by the DPW or other responsible party

These metrics will be tracked over the reporting cycle that is specified in the City's Certificate of Coverage.

SECTION T – PROCESS FOR REVISION

This procedure shall be reviewed once per permit cycle by the Stormwater Manager for any updates to streamline the requirement.