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December 4th, 2025

Garrett Meade
Administrator of Operations and Maintenance
Kalamazoo Regional Educational Service
1819 E. Milham Avenue
Portage, Michigan 49002
garrett.meade@kresa.org

RE: Stormwater Board Resolution
January 2026 Permit Application

Dear Mr. Meade:

An application is required to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to gain authorization to discharge water through the district's municipal separate storm sewer system (MS4) to waters of the state. Kalamazoo Regional Educational Service Agency (RESA) must submit a new application by January 30, 2026.

To fulfill the application requirements, the permittee must submit the following:

1. An ordinance or regulatory mechanism that prohibits non-stormwater discharges into the applicant's MS4.
2. An ordinance or other regulatory mechanism to address post-construction stormwater runoff from new development and redevelopment projects, including preventing or minimizing water quality impacts.

To meet the ordinance requirements of the permit, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) will accept a Stormwater Board Resolution in its place. An approved Stormwater Board Resolution is required for permit renewal/application.

Please have the school board review the Stormwater Board Resolution and return the passed resolution to Arch Environmental Group for submission to EGLE.

If you have any questions, please feel free to contact me at (248) 426-0165 [office] or (248) 896-4913 [mobile].

Sincerely,

Arch Environmental Group, Inc.
Environmental Services

Kathleen McBride
Manager, stormWATER Team

Attachments: Draft Stormwater Board Resolution
SW IDEP Discharge Regulatory Policy
SW Post-Construction Policy & Procedure

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**Kalamazoo Regional Educational Service Agency (RESA)
Board of Education
Resolution in Support of Stormwater Management Plan**

WHEREAS Kalamazoo Regional Educational Service Agency owns and operates facilities within the boundaries of the Kalamazoo Urbanized Area which discharges stormwater through a municipal separate storm sewer system (MS4) to surface waters of the State of Michigan; and

WHEREAS The Michigan Department of Environment, Great Lakes, and Energy maintains oversight and regulatory authority for compliance with the terms and conditions of the NPDES Municipal Separate Storm Sewer System discharge permit; and

WHEREAS Kalamazoo Regional Educational Service Agency has applied for and received permit coverage to discharge stormwater from Kalamazoo Regional Educational Service Agency facilities to the MS4; and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to comply with the NPDES Municipal Separate Storm Sewer System discharge permit requirements, and

WHEREAS Kalamazoo Regional Educational Service Agency has developed a Stormwater Management Program Plan (SWMP) outlining the policies, procedures, and best management practices to be employed by the district to comply with the permit requirements, and

WHEREAS the conditions of the NPDES Municipal Separate Storm Sewer System discharge permit require Kalamazoo Regional Educational Service Agency to develop policies and procedures that prohibit illicit discharges to their stormwater system and to implement appropriate enforcement procedures and actions to detect and eliminate such illicit discharges, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to prohibit the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to eliminate illicit discharges and illicit connections, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to prohibit the construction, use, maintenance or continued existence of illicit connections to the storm drain system. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to obtain a Part 91 permit from the appropriate state, county, or local governmental soil erosion permitting agency for new development and redevelopment projects that disturb one or more acres, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to obtain an NPDES construction site stormwater permit from the Michigan Department of Environment Great Lakes and Energy for new development and redevelopment projects that disturb five or more acres, and

WHEREAS Kalamazoo Regional Educational Service Agency agrees to use post-construction stormwater run-off 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.

THEREFORE, be it resolved that Kalamazoo Regional Educational Service Agency will enforce the above listed policies and procedures for illicit discharge elimination and control of stormwater runoff as part of the overall Kalamazoo Regional Educational Service Agency Stormwater Management Program Plan.

Duly passed and approved by the Kalamazoo Regional Educational Service Agency Board of Education, Kalamazoo County, Michigan this _____ day of _____, _____.

Approved:

Attest:

President

Secretary

Stormwater Management – Illicit Discharge Regulatory Policy

Kalamazoo Regional Educational Service Agency

Permit Number: Pending

Issue date: January 2026

This illicit discharge regulatory policy was developed as a regulatory policy for prevention of pollution from storm water runoff and to protect the quality of the waters of the State of Michigan through the regulation of non-stormwater discharges to the municipal separate storm sewer system (MS4) to the maximum extent practicable as required by federal and state law. This regulatory mechanism establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit through the Michigan Department of Environment, Great Lakes, and Energy (EGLE). The objectives of the regulatory mechanism are:

1. To regulate the contribution of pollutants to the MS4 by stormwater discharges by any user.
2. To prohibit illicit connections and discharges into the MS4.
3. To establish authority to investigate, inspect, and monitor suspected illicit discharges.

District properties include all Kalamazoo Regional Educational Service Agency properties.

Illicit Discharge means any discharge to, or seepage into the separate stormwater drainage system that is not composed entirely of stormwater or uncontaminated groundwater except discharges pursuant to an NPDES permit.

Illicit Connection means a physical connection to the MS4 separate stormwater system that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4 separate storm sewer system; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

Prohibitions of Illicit Discharges

1. Prohibition of Illicit Discharges:
 - a. Kalamazoo Regional Educational Service Agency prohibits the discharge of non-stormwater discharges into the storm drain system, including but not limited to pollutants or waters containing any pollutants.
 - b. No person shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw, drain, or otherwise discharge into the MS4 any pollutants or waters containing any pollutants, other than stormwater.
2. The following discharge is **not prohibited**:
 - a. This policy excludes prohibitions from the discharge or flows from firefighting activities to the Kalamazoo Regional Educational Service Agency MS4. Discharge or flows from

firefighting activities will be addressed only if they are identified as significant sources of pollutants to surface waters of the state.

- b. The following activities are **not prohibited** under this policy unless they are determined to be significant sources of pollutants to surface waters of the state:
- Water line flushing and discharges from potable water sources.
 - Landscape irrigation runoff, lawn water runoff, and irrigation waters.
 - Diverted stream flows and flows from riparian habitats and wetlands.
 - Rising groundwater and springs.
 - Uncontaminated groundwater infiltration and seepage.
 - Uncontaminated pumped groundwater, except groundwater cleanups specifically authorized by NPDES permits.
 - Air conditioning condensation.

Prohibition of Illicit Connections

1. The construction, use, maintenance or continued existence of illicit connections to the MS4 is prohibited.
2. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
3. A person is considered to be in violation of this regulatory mechanism if the person connects a line conveying sewage to the MS4 or allows such a connection to continue.
4. Improper connections in violation of this regulatory mechanism must be disconnected and redirected.
5. Illicit discharge and connections will be eliminated immediately.

Enforcement

The District Stormwater Program Manager will administer and enforce the stormwater management program, including investigate, inspect, and monitor suspected illicit discharges or illicit connections.

If you witness or think a discharge is taking place, please contact the Kalamazoo Regional Educational Service Agency at (269) 330-2409.

Stormwater Management - Post-Construction Policy & Procedure

Kalamazoo Regional Educational Service Agency

Permit Number: Pending

Issue date: January 30, 2026

Applies To: As required by the National Pollutant Discharge Elimination System (NPDES) permit for Kalamazoo Regional Educational Service Agency, the scope of this Guideline includes all development and redevelopment projects on District properties that involve either:

- a. earth disturbance of one (1) acre or greater,
OR
 - b. earth disturbance of less than one (1) acre, but which are part of a larger common plan of development or sale that would disturb one (1) acre or more.
-

Post-Construction Requirements Policy Statement

Kalamazoo Regional Educational Service Agency development and redevelopment projects on District property are regulated under and must comply with the Kalamazoo Regional Educational Service Agency NPDES permit for stormwater discharges, as issued by the Michigan Department of Environment, Great Lakes and Energy (EGLE). The Stormwater Management Post-Construction Requirements Guideline has been developed to provide guidance regarding responsibilities and actions to meet the NPDES permit conditions for development and redevelopment projects on district owned properties.

Post-Construction Plan for Stormwater Management

The post-construction plan for stormwater management on regulated sites **must** include:

- A minimum treatment volume standard to address water quality impacts.
- Channel protection criteria to address resource impairment resulting from flow volumes and rates.
- Review sites with known soil and/or groundwater contamination, including potential “hot spots” and evaluate the use of infiltration BMPs to meet water quality treatment and channel protection criteria to ensure that infiltration BMPs do not exacerbate existing conditions. Hot spots include areas with the potential for significant pollutant loading such as vehicle service and maintenance facilities, vehicle equipment cleaning facilities, fleet storage areas for buses, and outdoor liquid container storage.
- Drawings showing the location of stormwater control measures and the storm system.
- Details on the proposed stormwater control measures.
- Operation & Maintenance (O&M) requirements.
- Supporting information
 - Calculations used for designing all components of the stormwater management systems.
 - Total Suspended Solids (TSS) design removal rates and supporting manufacturer documentation, if applicable.

- Geotechnical report including soil boring and infiltration test data.

The project team [Architecture, Engineering & Construction, Other Project Manager, Project Developer and/or Contractors] shall develop the post-construction plan for stormwater management in accordance with this guideline and the NPDES permit.

Water Quality Treatment Volume Standard

The minimum treatment volume standard **must** be either:

- Treat the first one (1) inch of runoff from the entire site.
- OR**
- Treat the runoff generated from ninety percent (90%) of all runoff-producing storms for the project site, as summarized in MDEQ's memo dated March 24, 2006
https://www.michigan.gov/documents/deq/wrd-hsu-ninety-percent_557709_7.pdf

Total Suspended Solids

The treatment methods must be designed on a site-specific basis to achieve the following:

- A minimum of eighty percent (80%) removal of total suspended solids (TSS), as compared with uncontrolled runoff.
- OR**
- Discharge concentrations of TSS not to exceed 80 milligrams per liter (80mg/L).

A minimum treatment volume standard is not required where site conditions are such that TSS concentrations in storm water discharges will not exceed 80mg/L.

Channel Protection Criteria

The channel protection criteria must maintain post-development site runoff volume and peak flow rate at or below existing levels for all storms up to the 2-year, 24-hour event. "Existing levels" means the runoff volume and peak flow rate for the last land use prior to the planned new development or redevelopment. More restrictive channel protection criteria may be utilized on a case-by-case basis, as appropriate.

Site Plan Review

This policy is to establish a requirement to submit a site plan for review as required by the EGLE NPDES Stormwater Discharge Permit and ensure that water quality objectives, erosion and sediment control requirements, and BMP maintenance are considered to the maximum extent practicable.

Kalamazoo Regional Educational Service Agency shall evaluate proposed construction activities to determine:

- If the activity meets the criteria of a development or redevelopment project with an earth disturbance greater than or equal to 1 acre, or part of a common plan of development resulting in a development or redevelopment activity greater than or equal to 1 acre in size.
- Does the development or redevelopment project discharge to waters of the state, or to a county, city, or township MS4.

If the development or redevelopment project discharges directly to waters of the state, Kalamazoo Regional Educational Service Agency shall comply with the post-construction standards outlined in this SWMP.

If the development or redevelopment project discharges to a regulated county, city, or township MS4, Kalamazoo Regional Educational Service Agency shall submit the site plan for review and approval. Site plan approval by the county, city, or township of an equivalent post-construction standard ensures acceptable compliance with the Kalamazoo Regional Educational Service Agency NPDES MS4 Stormwater Discharge Permit. Kalamazoo Regional Educational Service Agency shall obtain and maintain a copy of the site plan approval *document*.

If the development or redevelopment project discharges to a county, city, or township MS4 that is not regulated or require site plan review, Kalamazoo Regional Educational Service Agency shall comply with the post-construction standards outlined in this SWMP.

Operations & Maintenance Plans

All structural and vegetative stormwater control measures installed as a requirement under this section of the permit shall include a plan for maintaining maximum design performance through long-term operation and maintenance.

Enforcement

The Kalamazoo Regional Educational Service Agency Stormwater Program Manager will administer and enforce the stormwater management program, including maintaining procedures, guidance, information, etc. to aid district staff and contractors in complying with the post-construction requirements for stormwater management.