

## Individual Permittee ERP

### Attachment 2 to MDEQ Stormwater Discharge Permit Application

1. Provide the ERP. The ERP shall include the applicant's expected response to violations to compel compliance with an ordinance or regulatory mechanism implemented by the applicant in the SWMP (e.g., written notices, citations, and fines). The ERP shall contain a method for tracking instances of non-compliance, including, as appropriate, the name of the person responsible for violating the applicant's ordinance or regulatory mechanism, the date and location of the violation, a description of the violation, a description of the enforcement response used, a schedule for returning to compliance, and the date the violation was resolved. The applicant may keep an electronic file or hard copy file of the enforcement tracking.

Our Community does not have an existing Ordinance or regulatory mechanism that would prohibit non-stormwater discharges into our MS4's. At this time, we would use our Dangerous and Hazardous Substances Cleanup Ordinance (See Attachment 2 "F"). But this would only cover certain dumping not all. We are currently working on a Storm Water Ordinance. A draft of this Ordinance is attached (See Attachment 2 "G").

Because this is not able to be adopted by Oct 1, 2014, we are including a timeline for completion. We understand that it must be adopted ASAP. Milestones are listed below:

1. Township Attorney has the changes made in this update and is reviewing those changes by February 15, 2015.
2. Board will have voted by March 16, 2015.
3. It will be adopted by April 1, 2015.
4. Effective date on or before April 1, 2015.

13. Provide the procedure for responding to illegal dumping/spills. The procedure shall include a schedule for responding to complaints, performing field observations, and follow-up field screening and source investigations as appropriate.

See page 6 IDEP Plan (Attachment 2).

15. Provide the procedure that includes a requirement to immediately report any release of any polluting materials from the MS4 to the surface waters or groundwaters of the state, unless a determination is made that the release is not in excess of the threshold reporting quantities in the Part 5 Rules, by calling the appropriate MDEQ District Office, or if the notice is provided after regular working hours call the MDEQ's 24-Hour Pollution Emergency Alerting System telephone number: 800-292-4706

*This has been added to the Spill Notification form (Page 27-28 of the IDEP plan)*

*We use the Spill Notification form (Page 27-28 of the IDEP plan)*