

# Attachment 2

To MDEQ Stormwater Discharge Permit Application  
( IDEP Plan)

(IDEP Protocol Manual)

(Individual Community Enforcement Authority)

(Illicit Discharge Ordinance/ Regulatory Mechanism)  
(IDEP Ordinance Schedule)

# ILLICIT DISCHARGE ELIMINATION PLAN (IDEP) 2014 Application

Submitted in partial fulfillment of the State of Michigan National Pollutant Discharge Elimination System Permit Application for Coverage of Storm Water Discharges by:

## **GENESEE COUNTY PHASE II PARTICIPANTS**

### **Phase II Permittees:**

Burton; Clio; Davison; Davison Township; Fenton; Fenton Township; Flint Township; Flushing; Genesee Township; Grand Blanc; Linden; Mount Morris; Mount Morris Township; Swartz Creek; Vienna Township; Genesee County.

### **Nested Jurisdictions under Genesee County Permit:**

Atherton Community Schools	Fenton Area School	Lake Fenton Schools
Beecher Community Schools	Flint Board of Educations	Linden Community School
Bendle Public Schools	Flushing Community Schools	Mt. Morris Consolidated Schools
Bentley Community Schools	Genesee Schools District	Swartz Creek Community Schools
Carman Ainsworth Community Schools	Genesee Intermediate School District	Westwood Heights Schools
Clio Area Schools	Grand Blanc Community Schools	
Davison Community Schools	Kearsley Community Schools	Bishop Airport*

The Bishop Airport property is nested under Genesee County's permit for their storm water runoff only. They also have an industrial discharge permit for their other activities.

**The Municipal Separate Storm Water Discharge Permit requires that all MS4s develop an illicit discharge elimination plan (IDEP). The above communities have entered into a 342 agreement with the Genesee County Drain Commissioner's office (GCDC) to assist them with their stormwater needs. As part of the contracted agreement the GCDC will be conducting the IDEP activities required by the permit on behalf of the communities and nested jurisdictions. This plan is submitted on behalf of all of the above communities and nested jurisdictions. It outlines the approach to be used to meet their IDEP obligations. The major components of the Genesee County IDEP plan include field verification of outfall locations, reviewing and eliminating illicit discharges, reviewing the legal authority, minimizing seepage from septic systems and sanitary sewers, and the coordination of activities.**

### **Reviewing the Legal Authority**

Legal authority for the management & elimination of illicit connections and discharges stems from two state authorities. The first is the Michigan National Pollutant Discharge Elimination System (NPDES) permit (MIG60000) which enables local communities to grant themselves the authority to regulate, prohibit, investigate, monitor and enforce illicit connects and discharges. The 342 permitted communities

have been provided with an ordinance template that addresses each of these requirements that they can tailor to their own situation and then adopt it into their local code. Individual permittee legal authority is under a **separate document**.

The second legal authority stems from the Michigan Drain Code of 1956, Section 280.423, which grants the Genesee County Drain Commissioner (GCDC) the authority to prohibit illicit discharges. This authority applies to all legally established county drains. The relevant section from the Michigan Drain Code is attached.

The third legal authority is the Genesee County Health Department (GCHD), which governs septic systems only.

The fourth legal authority stems from PA 283 of 1909, section 19b. which requires a person, partnership, association, corporation or governmental entity to acquire a Permit for work within a county road from its Road Commission. Work would include connecting storm water outlets within the Road ROW. The relevant section is attached.

The GCDC together with local community representatives has reviewed the current legal authority and enforcement procedures. The County storm water ordinance template will provide local municipalities with the authority (once adopted) to prohibit illicit discharges and manage outfalls for all municipal drainage systems. Attachment "C" is the section out of the template ordinance that covers legal authority to prohibit illicit discharges.

The BMP subcommittee has been working on developing the Stormwater Ordinance, which includes the authority to detect and eliminate illicit connections and discharges to the permittee's MS4. Pursuant the COCs, the Stormwater Ordinance Template was submitted to the MDEQ for review under the revoked 2008 permit. The following schedule will be followed for adoption of the ordinance:

Aug 11, 2010: Meet with MDEQ, to go over comments and concerns.

October 11, 2010: make necessary changes and submit copy to MDEQ.

March 8, 2011: MDEQ withdrew 2008 permit

2014\* required communities to adopt ordinance.

### ***Field Verification of Outfall Locations***

The outfall map section of this plan is based on field investigation conducted in the previous permit cycle together with permittee records. Although a majority of the collection systems was surveyed in the first permit cycle not all outfalls have been field verified. The IDEP plan approved under the previous permit used a different approach to locate and field verify outfalls. The IDEP crews walked the waters of the state within Genesee County and located all outfalls whether they were MS4's or private. With the 2008-2013 permit cycle, only MS4's are being identified. The outfalls that are being identified and screened are all MS4s where they are going from permittee jurisdiction into the waters of the state and discharge points between two permittee MS4 jurisdictions. **Note: Genesee County's permit covers several agencies and nested jurisdictions. A single outfall identified under the County's permit may contain multiple discharge points between agencies or nested jurisdictions covered under the same permit.** An important part of this cycles IDEP work will be to continue to field verify the location of mapped outfalls. Additionally, ownership (municipal MS4 or private) will be determined for each outfall. Maps are being continually updated, but are available in a shapefile version (GIS). Electronic copies are available and were provided to the MDEQ upon request in 2010 and an updated version November 2011. Yearly outfall updates are prepared and submitted within the progress report.

All known outfalls and discharge points for each community (except Burton and Genesee County) have been identified. Genesee County's agencies and nested jurisdictions combined have more than 1,500 categorical discharges that are being identified. City of Burton took over the roads from the Genesee County Road Commission in the last 10-years. This has provided a significant larger number of outfalls under the City of Burton's jurisdiction than originally anticipated. Identification of the outfalls for Burton Roads has been complicated by not all roads having maps.

All outfalls identified as of April 1, 2014 are located in attachment 1. If all outfalls are not identified a plan is included on how they will be identified prior to Oct 1, 2014. A shape file of the outfalls and storm systems are available. As outfalls are added/ removed, specific location(s) for additional outfall(s) will be reported as needed. Changes will be reflected in an updated map to be included in the progress reports.

### ***Prioritizing Areas for Dry Weather Flow***

Areas to be dry weather flow tested first are prioritized based on the permit application (page 5) and other criteria listed below. Before Oct 1, 2014 all known outfalls will be evaluated based on the criteria below be ranked as high, medium or low priority and the basis for that ranking. Dry weather testing will be done based on the schedule below and geography to maximize resources and to reduce travel time, proximity of outfalls to one another will be taken into consideration. Copies of the updated outfalls with the priorities will be available to the State upon request.

NOTE: Individual Permittees that opt to follow a alternative procedure for dry weather testing will need to provide to the State their procedure that would supersede this one.

#### **High Priority**

- Areas with older infrastructure
- Industrial, commercial, or mixed use areas
- Areas with a history of past illicit discharges
- Areas with a history of illegal dumping
- Areas with onsite sewage disposal systems
- Areas with older sewer lines or with a history of sewer overflows or cross-connections
- Areas with poor dry-weather water quality
- \*Areas with water quality impacts, including waterbodies identified in a Total Maximum Daily Load
- Verification of Categorical Outfalls (previously unmapped ?& never tested)
- Discharge complaints and reports

#### **Medium priority**

- Other potential pollutant generating sites
- Type of commercial activity
- Areas with sewer conversions or historic combined sewer systems

#### **Low priority**

- Undeveloped area
- Subdivisions less than 30 years old with no know history of illicit discharge
- Confirmed illicit discharge that has been removed
- Upstream Discharge points that are already being sampled at the outfall regardless of jurisdiction unless a suspected illicit discharge is found

\*The only TMDL in Genesee County is for ecoli. The outfall would only be considered high priority under this choice if it had the potential of discharging ecoli.

#### **Schedule: outfalls to be dry weather tested**

2015	High priority outfalls for Municipalities 60% complete, Genesee Co 10% complete
2016	High priority outfalls for Municipalities 95% complete, Genesee Co 25% complete
2017	High priority outfalls for Municipalities 100% complete, Genesee Co 50% complete Medium priority outfalls for Municipalities 50% complete, Genesee Co. 10% comp
2018	High priority outfalls for Genesee Co 75% complete Medium priority outfalls for Municipalities 100%, Genesee Co. 60%
2019	High priority outfalls for Genesee Co 100% complete Medium priority outfalls for Genesee Co. 100%
	Low priority outfalls will be done in 2020-2025 permit cycle

Although ok the outfalls will be completed at the end of the 5-year IDEP cycle the year-to-year schedule is subject to adjustments due to weather, financial considerations and staff availability.

**\*Prior to October 1, 2014 a list showing the priority level of each outfall will be provided to the State.**

#### **Performing Dry-weather Screening**

As mentioned above, one of the primary actions under the IDEP program is to identify and remove all illicit discharges and connections from the municipal storm sewer system. The outfall maps presented in Attachment 1 of the 2014 application is in ArcView GIS and this information will be updated and added to for guiding the screening of outfalls for dry weather flow.

To achieve IDEP requirements, each outfall that is prioritized High or Medium will be screened for signs of illicit discharges. Where illicit discharges are suspected, systematic investigation upstream of the outfall will be conducted to trace the discharge to the source where practicable.

\*Genesee County outfalls include all County agency and nested jurisdiction outfalls. A single outfall identified under the County's permit may contain multiple discharge points between agencies or nested jurisdictions covered under the same permit. Only the County agency/ nested jurisdiction at the point of outlet will be indicated on the outfall table. The PA 342 Contract acts as a interagency agreement.

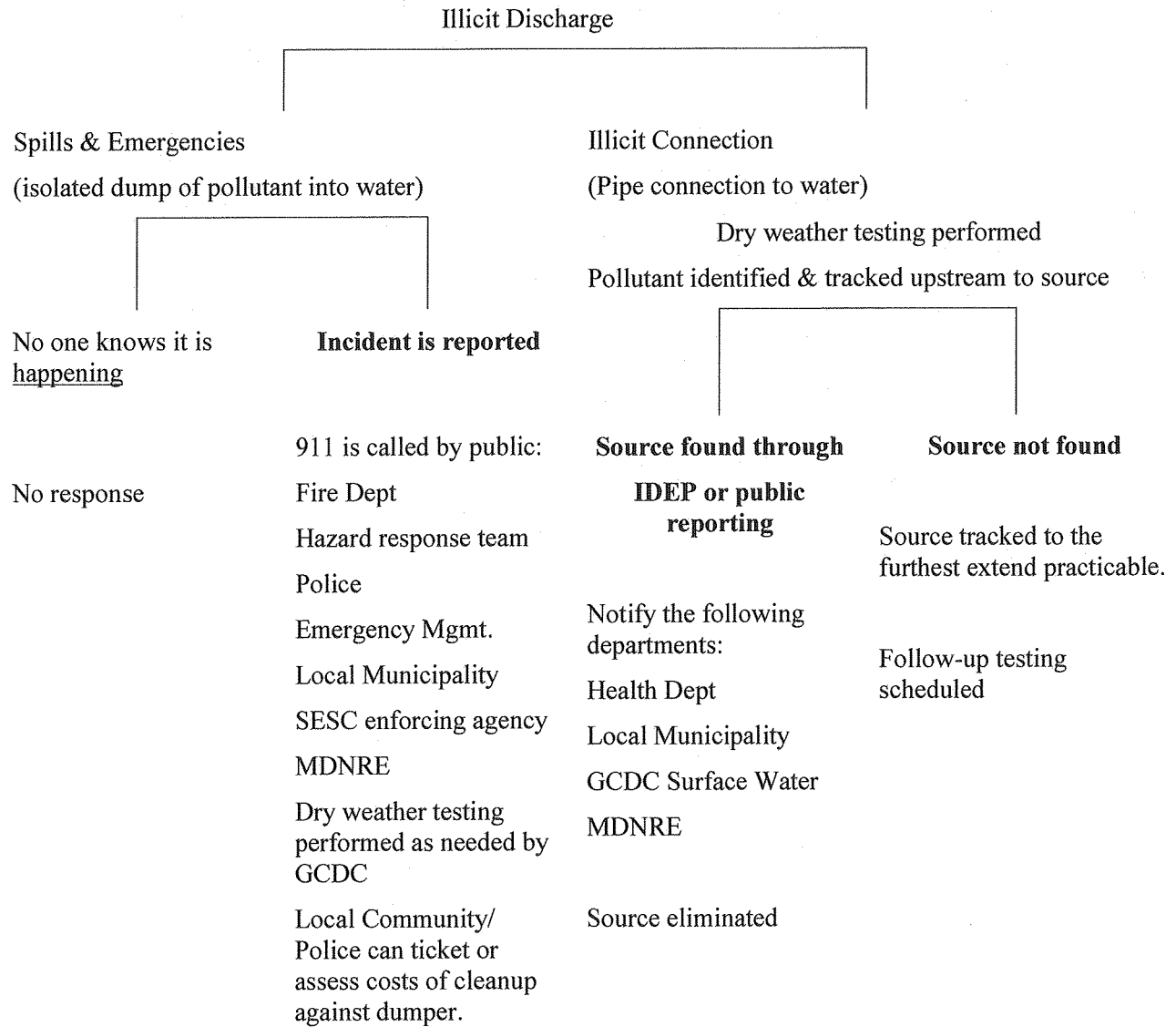
The process of locating and removing illicit connections is illustrated in an attached Work Plan Flow Chart. The flow chart is discussed in detail below. Forms for recording field inventory information and observations if dry weather flow is observed are also included at the end of this section. The dry weather screening form could be used multiple times at a single site if a suspected connection or discharge requires follow-up site visits.

The High or Medium outfall will be observed in the field during dry weather conditions, 72 hours with less than 0.10 inches of rainfall, and the sites will be checked for intermittent flows if suspected. If flow is present, it will be visually observed, checked for odors, and tested for representative tracer parameters such as pH, temperature, E. coli, fecal coliform, detergents, ammonia, and total organic carbon. The thresholds for the above parameters that trigger activity to determine the sources of illicit connections are listed below. All of these tests, except for pH and temperature, will be performed by a professional contract laboratory. Test results and observations will be used to identify areas that require follow-up investigations.

Parameter	Threshold
Ammonia (NH <sub>3</sub> )	1 mg/l
Surfactant	.2 mg/l
E.coli.	2000 Col. Per 100 ml
Ph	7 - 9

## Decision Making

Depending upon the type of illicit discharge there are various responses that can occur. The following chart outlines the appropriate responses to an illicit discharge based upon whether they are spills and emergencies or illicit connection.



Depending on the type and location of an illicit discharge, the responsible party can change. In a spill or emergency, 911 should be called to initiate the emergency response. As an illicit discharge is identified and information is gathered, the responsible party will be identified from the above bulleted list.

The following are examples of the types of materials that if discharged constitute a spill or an emergency due to the potential introduction of pollutants to local waterways either directly or through stormwater: dredged spoils, solid waste (see below), sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat sources, wrecked or discarded equipment, rock, sand,

petroleum products, industrial, municipal, and agricultural waste. This list is not meant to be exhaustive. The quantity of the spill should also be considered in conjunction with the type of spill that has occurred before reporting it. For example, wastewater from painting activities need not be reported to 911 but one may wish to mention it to the authorities such as public works, or the GCDC to have them contact the offender in order to educate them.

Illegal dumping: permittee will make sure 911 has been contacted, who will contact fire dept, police, emergency management and the hazardous response team. Local responder will depend on the nature of the discharge (see above) and if a responsible party is identified. If a responsible party is identified, a private cleanup company may be involved. MS4 owner is enforcement agency for follow up. (local municipality, County, MDNRE).

Illicit sanitary connection: once identified, GCDC will contact the Health Dept, local community, MS4 owner and MDNRE by letter. Enforcement agency for follow up is Health Dept, coordinated with GCDC.

Failing soil erosion measures: MS4 owners are the enforcement agency once construction is complete and the soil erosion permit has been released. If the site is a current construction site, the permittee will make sure the presiding SESC agency has been notified pursuant section 9107 of Part 91 and fill out a spill form. If there is an active SESC permit then the presiding SESC agency is the enforcement agency.

Large quantity spill: permittee will make sure 911 has been contacted, who will contact fire dept, police, emergency management and the hazardous response team. Local responder will depend on the nature of the discharge and if a responsible party is identified. If a responsible party is identified, a private cleanup company may be involved. MS4 owner is enforcement agency for follow up. (local municipality, County, MDNRE).

In all the above instances, if a responsible party is not identified, and if the spill is significant enough to warrant clean-up, measures will be taken to address the problem by local authorities to levels that at a minimum ensure public safety. The decision to commence with a clean-up will be made by whoever has jurisdiction over the spill site. In some cases there maybe multiple jurisdictions in which case all parties will be consulted on the course of action to occur. For all significant spills, the MDEQ will receive verbal notification of the event within twenty-four (24) hours.

Within Individual communities, if an emergency spill is received, this person will make sure that the call gets resolved or forwarded to the responsible agency.

- |                        |                               |
|------------------------|-------------------------------|
| • Davison Township     | DPW Director                  |
| • Fenton Township      | Ordinance Enforcement Officer |
| • Flint Township       | Building Dept Agent           |
| • Genesee Township     | Code Enforcement Officer      |
| • Mt. Morris Township  | Code Enforcement Officer      |
| • Vienna Township      | Building Superintendent       |
| • City of Burton       | DPW Director                  |
| • City of Clio         | City Administrator            |
| • City of Davison      | Clerk/DPW                     |
| • City of Fenton       | DPW Director                  |
| • City of Flushing     | DPW Supervisor                |
| • City of Grand Blanc  | Public Works Director         |
| • City of Linden       | DPW Director                  |
| • City of Mt. Morris   | DPW Superintendent            |
| • City of Swartz Creek | DPW Director                  |
| • Genesee County       | GCDC-SWM Drain Engineer       |



### ***Illicit Source Identification***

GCDC-SWM has been contracted to coordinate the dry weather testing and perform any follow up on behalf of the Contracted Phase II communities and nested jurisdictions listed on the first page of this document. When initial testing has identified a potential problem, it will be given to the GCDC office staff to follow up and confirm an illicit connection or not. The land use and type of buildings in the area will be considered to determine the next course of action. Based on the land use and the results of the observations and chemical testing, additional manholes will be investigated. Tracing of the pollutant stream will continue by manhole investigations until the source is isolated within a relatively short reach of sewer. Dye testing of building fixtures will then be used to locate the source.

Dye testing will be scheduled by GCDC staff at individual buildings following notification of the building owner to explain the need for this investigation and how it will be performed. In general, dye testing will be used as the final step to gain positive identification of an illicit connection. Televising the sewer may be used to further isolate the pollutant source or may be used if dye testing does not reveal the source of the problem. This approach is intended to locate illicit connections in the most cost-effective and efficient manner possible. It will focus the use of dye testing in those areas with the highest potential for illicit connections.

Field investigations to identify specific illicit connection locations will be performed by either the GCDC or a consultant contract. If a source is found discharging to a municipal's or nested jurisdiction's MS4 that is not owned by Genesee County, GCDC will also notify owner, elected official (supervisor, mayor or superintendent) or in the case of the airport the facilities manager for assistance to perform the tracking and elimination of the illicit discharge. If a source is found discharging to a Genesee County MS4, GCDC will also notify the appropriate agency(ies) for assistance to perform the tracking and elimination of the illicit discharge.

Illicit discharges to MS4 systems other than the County's, 342 communities and nested jurisdictions that are discovered will result in the generation of a letter to the owner/operator informing them of the problem. If it is a confirmed illicit discharge the MDEQ will be copied on the letter.

Occasionally, hot spots are located that may threaten local water quality. Stormwater hot spots are areas where current or legacy land uses or activities generate contaminated runoff, with concentrations of pollutants exceeding those typically found in stormwater. A typical example is an abandoned underground storage tank associated with a gas station. If a suspected hot spot comes to the attention of GCDC they will develop a plan to monitor the hot spot and the surrounding area, within their capacity, to determine the degree and extent of the problem and the threat (if any) it may pose to local waterways and public health. Appropriate action will then be taken as limited by the availability of funds.

When potential illicit connections are located, the GCDC will be provided with specific details by the consultant/ field investigator. The GCDC will be responsible for coordinating the tracking of an illicit connection upstream to its source and elimination. Once an illicit connection has been confirmed a letter to notify the property owner / responsible party and other involved parties (including the municipality, MS4 owner and the MDEQ) of the violation and require corrective action by the property owner or responsible party. If the illicit connection is time sensitive or beyond the jurisdiction of this program (such as an industrial discharge), an e-mail may be sent in lieu of a letter. Once the confirmed illicit connection has been eliminated a follow-up letter will be sent to all involved parties.

### ***Eliminating Illicit Discharges and Pursuing Enforcement Action***

Prioritization of verifying and removing potential illicit connection is done through a combination of when they are initially detected (chronologically) and by geographical location (trying to maximize resources through scheduling investigation that are close to each other). If the property owner does not respond in the specified time frame, follow-up enforcement action will be taken by GCDC or the appropriate enforcing agency. Each problem is unique and depending upon the circumstance. When the property owner or responsible party has indicated that a connection has been eliminated, GCDC will confirm that all problems have been fixed to their satisfaction for both the County Departments, nested jurisdictions and 342 communities.

GCDC and its partners will work to eliminate all illicit discharges to the maximum extent practicable. This means exhaustive steps will be taken within the limits of financial and technical resources available to address the problem. Occasionally, elimination of the source is not possible either because it cannot be found or the cost to address the problem exceeds the benefits of making the correction. In these cases either a management plan will be implemented and/or the location identified for regular monitoring by the owner/operator.

Updated maps are provided in the progress reports that reflect ownership, status of any illicit connections found, as well as corrections to the original information in the permit.

### ***Public Notification System for Illicit Discharges***

Currently the Illicit Discharge system is split between those that are associated with illegal dumping and those releases associated with MS4s. The above flow chart illustrates the various paths and responsible parties involved in managing Illicit Discharges.

The number of possible ways that an illegal dumping can occur compounded by the number of agencies involved make centralization of this function extremely difficult and cost prohibitive under the current economic climate. Furthermore, centralization of the function may in-fact reduce response time and clean up efficiency due to having to educate the public about the who they should call. Current laws do not provide for a single responsible party.

The permit requires the permittee to develop and implement a procedure for the receipt and consideration of complaints or other information submitted by the public regarding construction activities discharging waste to the MS4.

The M&M Subcommittee had already created a form to be used to track illegal dumping as reported by the public, similar in concept to a "chain of custody" form used to track hazardous materials. The form originates with the agency that receives the call from the public and end with GCDC. This way illegal dumping calls will be responded to as they are received. Calls will continue to be prioritized by the type of suspected release. For example, from the responder's perspective a suspected oil spill will take precedent over a suspected detergent spills. Another benefit to improving the current system is that it allows local communities under current laws to levy fines and collect clean-up costs if the responsible party can be identified.

The illicit dumping form will direct the originating agency to notify GCDC within 24 to 48 hours and inform them of any corrective action taken. This way GCDC can track any open notification that still may need to be followed up on as well as determine any apparent patterns that may lead to eliminating re-occurrences in the future.

The permit requires the permittee to develop and implement a procedure to provide notice to the part 91 permitting entity and the Department when pollutants are discharged in violation of section 9116 of Part

91 (SESC rules). The requirement of notice of violation has already been required in section 9107 of Part 91. A new procedure is unnecessary.

Note: minor changes to the spill form have been done to include SESC information to notify of SESC complaints.

### ***Minimizing Seepage from Septic Systems and Sanitary Sewers***

A map of the sanitary sewer service areas was prepared in 2006 for the watershed plan to define areas where sanitary service is available and septic tanks can be prohibited. Those areas with possible septic tanks are included in the watershed management plans. As part of the actions in the Watershed Management Plan, Genesee County will explore the possibility for a time of sale septic tank inspection ordinance and coordinate such activities with the County Public Health Department.

GCDC Water and Waste Services (WWS) has a PA 342 Water and Sewer Advisory Board (WSAB) with their water and sewer community customers. The WSAB have a sanitary sewer infiltration and inflow removal program (I&I Program). This program is being enforced by both GCDC-WWS and the local communities that use the WWS treatment plants. Since 2001 there has been a significant effort to reduce I&I through monitoring flows between communities, lining sanitary lines, locking sanitary lids, waterproofing structures, footing drain removal and other efforts by all parties. This has resulted in a wet weather reduction to the treatment plants. There has also been a reduction on sanitary sewer overflows due to wet weather. WWS has also focused on efforts to the infrastructure and treatment plants to build in non-wet weather capacity.

### ***Training***

At the start of every IDEP field season training is conducted for new Tetra Tech employees, summer interns, GCDC personnel and individuals from various other firms and municipalities. The training is typically for an entire day and provides procedural information for individuals that have not previously been involved in IDEP operations, and it serves as a refresher for the regular IDEP field crews. There is both an in-class module and a field demonstration. Through the use of Power Point presentations, IDEP protocol manuals, and hands on training in the field, individuals are given the tools to collect and record the required data under the Phase II Storm Water permit.

At a minimum the following topics are covered:

The definition of illicit discharges and connections

Techniques for finding illicit discharges, including field screening, source identification, and recognizing illicit discharges and connections

Methods for eliminating illicit discharges and the proper enforcement response

A training schedule and requirement for training during the term of the permit

Additional topics usually include:

The methodology that will be utilized by the municipality to find, prioritize and eliminate illicit discharges and connections to the municipal separate storm sewer system (MS4)

The IDEP investigation history for the municipality

Desktop assessment of illicit discharge potential within the municipality, including assessment of the highest priority investigation areas based on the prioritization criteria listed in Table 1 of the permits

Investigation planning and preparation for field work

Field techniques that can be used to detect and identify the sources of illicit discharges/connections.

### ***Training for staff that have field jobs***

For staff that do not actually perform Dry weather flow, but do work in field jobs that would have the potential for them to witness illicit discharges and connections, a information sheet is being developed. See Attachment C. This will be provided to appropriate staff per IDEP training and evaluation (#18) requirements in the 2014 application and can be used to train staff.

An information sheet on signs of an illicit discharge, see attachment – will be provided to staff per IDEP training and evaluation (#18) requirements in application. We will provide the training/literature on the following schedule:

At a minimum, existing staff shall be trained at least once during the permit cycle. New hires will be trained within the first year of their hire date.

### ***Effectiveness of IDEP program***

The current permit requires that the permittee determine the effectiveness of their illicit discharge elimination activities. These evaluation activities are in addition to inspecting each high and medium storm water point source every five years. GCDC will use three evaluation methods, all of which are approved methods in the MDEQ IDEP guidance. The current GCDC IDEP program will continue to compare the number of illicit discharges/connections eliminated versus the number found and report these in the annual report. The second evaluation method is to use the illicit discharge tracking form for public generated complaints. Information collected will be reported in the progress reports. The last evaluation method to be used is the ambient water quality monitoring results generated yearly from the existing program. Project Green, FRWC's Benthic Monitoring, monitoring conducted for IDEP investigation and any additional hot spot monitoring are updated and analyzed annual.

### ***Progress Report***

GCDC together with its member permittees will provide documentation of the actions taken to eliminate illicit discharges. For identified illicit discharges, the permittees shall summarize the total estimated volume and pollutant load eliminated for the main pollutants of concern, and the locations of the discharges into both the permittees MS4 and the receiving water.

### ***Coordination of Activities***

The Genesee County Drain Commissioner will be coordinating with all municipalities, county agencies and nested jurisdictions to address illicit connections/discharges, local ordinances, and seepage from septic systems and sanitary sewers. This work is proposed to be performed under a PA 342 contract with Genesee County. All work is proposed to be directed by the Drain Commissioner and coordinated with the Road Commission, Health Department, Emergency Management Services, and local officials, as appropriate. Annual discussions on IDEP matters will be placed on 342 committee of the whole meetings.

### ***Record Keeping***

Permittees shall make records associated with IDEP activities to address illicit discharges and connections available to the MNRE upon request.

### ***Program Schedule***

Activities to be performed within **12 months** include:

- Continue to annually train field staff on procedures for the IDEP compliance requirements.

- Fully implement the public complaint and reporting system.

- Continue to require sanitary sewer connections when available.

- Track activities for Permit Reports.

Activities to be performed within **24 months** include all of the ongoing actions listed above as well as:

- Visually inspect mapped storm sewer outfalls for dry weather flow for all identified outfalls in the permit application.

- Prepare Permit Report.

- Conduct follow up field investigation on suspected illicit discharges and priority areas.

## DRAINAGE SYSTEM INVENTORY

### GENERAL

ID

Date \_\_\_\_\_

Time \_\_\_\_\_

Crew Initials \_\_\_\_\_

Chk By: \_\_\_\_\_

Photographs: Roll # \_\_\_\_\_ Picture #'s \_\_\_\_\_

### DISCHARGE STRUCTURE TYPE

☐ PSD

☐ Manhole

☐ Catch Basin

☐ Culvert Outlet

☐ Point in Open Channel

☐ Abandoned

☐ Unknown

### PSD Status

☐ PSD

☐ Not a PSD

☐ PSD Not in Permit (New)

☐ PSD Not Permittable

☐ Structure within Drainage Network

### LOCATION (see back side for location sketch)

Latitude

Longitude

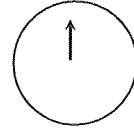
Invert Elevation

Offset Description:

Receiving Waterbody: \_\_\_\_\_

## DISCHARGE STRUCTURE INFORMATION

Pipe ID						
Direction from MH						
Shape						
Diameter (in)						
Width (in) (Open Channel)						
Depth (in)						
Measure Down (ft) (Manhole)						
Invert Elevation (ft) (Pipes)						
Conduit Material						
US/DS End						



Comments

## LOCATION SKETCH

### LOCATION SKETCH CHECK LIST

Label Street Names

Indicate North

Locate manholes by dimensions from property lines, back of curb, or edge of pavement

Sketch catch basins and connections (no measurements necessary).

Indicate (if possible) distance to upstream and downstream manholes

Landmarks/nearest address, if any

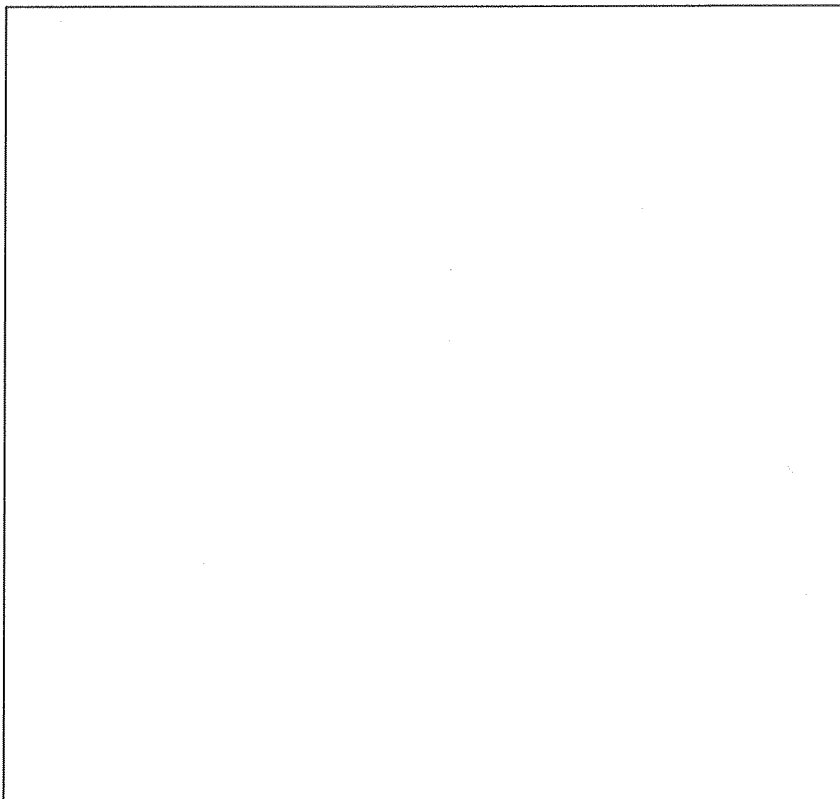
Flow direction

Sample point

Special access/traffic control notes

Between mile markers \_\_\_\_\_ & \_\_\_\_\_ or \_\_\_\_\_ tenths past mile marker \_\_\_\_\_

Velocity/depth measure location





## DRAINAGE SYSTEM SCREENING

### GENERAL

ID Date Time Air Temp Rain ☐ Yes ☐ No☐ Clear/SunnyCrew Initials Chk By: ☐ Partly CloudyPhotographs: Roll #  Picture # ☐ Overcast

### DRY WEATHER FLOW PRESENT

☐ Yes, Dry Weather Flow Present☐ Trace, Insufficient☐ No Dry Weather Flow Present☐ Standing Water☐ Submerge☐ Inundated☐ N/A

### FLOW MEASUREMENTS

Pipe Sampled: Size (in)  Direction Method: ☐ Tt Method

General Data

Travel

☐ Area \* Velocity

Depth, (in)

Time Trials

☐ Bucket

Dist Traveled, (ft)

#1 (sec)

☐ Manning's

Bucket Vol, (l)

#2 (sec)

Channel Slope  
(%)

#3 (sec)

Channel Material

Avg (sec)

Flow: 

Channel, n

Vel (fps)

Intermittent ☐ Not CheckedFlow Check ☐ Left Sand Bag in Channel☐ Removed Sand Bag, intermittent DWF present ☐ Yes ☐ No

if possible describe frequency, duration, time of day of flow slugs – put in comments section

**DISCHARGE OBSERVATIONS** (if "other" checked fill in description at bottom of page)

Odor	<input type="checkbox"/> None	<input type="checkbox"/> Musty	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rotten Egg	<input type="checkbox"/> Gas	<input type="checkbox"/> Oil	<input type="checkbox"/> Other
Floatables	<input type="checkbox"/> None	<input type="checkbox"/> Trash	<input type="checkbox"/> Sewage	<input type="checkbox"/> Bacterial Sheen	<input type="checkbox"/> Oil Sheen	<input type="checkbox"/> Suds	<input type="checkbox"/> Other
Deposits/ Stains	<input type="checkbox"/> None	<input type="checkbox"/> Mineral	<input type="checkbox"/> Sediment	<input type="checkbox"/> Oily	<input type="checkbox"/> Grease	<input type="checkbox"/> Suds	<input type="checkbox"/> Other
Vegetation	<input type="checkbox"/> None	<input type="checkbox"/> Normal	<input type="checkbox"/> Excessive	<input type="checkbox"/> Algae	<input type="checkbox"/> Slime		<input type="checkbox"/> Other
Structural	<input type="checkbox"/> Normal	<input type="checkbox"/> Cracking	<input type="checkbox"/> Spalling	<input type="checkbox"/> Corrosion	<input type="checkbox"/> Settlement	<input type="checkbox"/> Staining	<input type="checkbox"/> Other
Color	_____	Enter #					
	—						
Turbidity	_____	Enter #					
	—						

**Description:**

# **RECEIVING WATER OBSERVATIONS** (if "other" checked fill in description at bottom of page)

Odor	<input type="checkbox"/> None	<input type="checkbox"/> Musty	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rotten Egg	<input type="checkbox"/> Gas	<input type="checkbox"/> Oil	<input type="checkbox"/> Other
Floatables	<input type="checkbox"/> None	<input type="checkbox"/> Trash	<input type="checkbox"/> Sewage	<input type="checkbox"/> Bacterial Sheen	<input type="checkbox"/> Oil Sheen	<input type="checkbox"/> Suds	<input type="checkbox"/> Other
Deposits/ Stains	<input type="checkbox"/> None	<input type="checkbox"/> Mineral	<input type="checkbox"/> Sediment	<input type="checkbox"/> Oily	<input type="checkbox"/> Grease	<input type="checkbox"/> Suds	<input type="checkbox"/> Other
Vegetation	<input type="checkbox"/> None	<input type="checkbox"/> Normal	<input type="checkbox"/> Excessive	<input type="checkbox"/> Algae	<input type="checkbox"/> Slime		<input type="checkbox"/> Other
Bank	<input type="checkbox"/> Excessive Vegetation	<input type="checkbox"/> Staining of Banks	<input type="checkbox"/> Erosion	<input type="checkbox"/> Trash			<input type="checkbox"/> Other
Color	_____		Enter #				
Turbidity	_____		Enter #				

Description:

## **DRAINAGE SYSTEM SCREENING (Continued)**

ID

## **CHEMICAL ANALYSIS**

FIELD ANALYSIS      LAB SAMPLE COLLECTED ID \_\_\_\_\_

Surfactants	_____	mg/L	Temperature	_____
Ammonia	_____	mg/L	pH	_____
Boron	_____	mg/L	Specific Cond.	_____
Potassium	_____	mg/L		
E. Coli	_____	per 100ml		

## RESULTS

- ☐ Illicit Connection Ruled Out
- ☐ Illicit Connection (undocumented connection)
- ☐ Pending
- ☐ Notify City
- ☐ Not a PSD

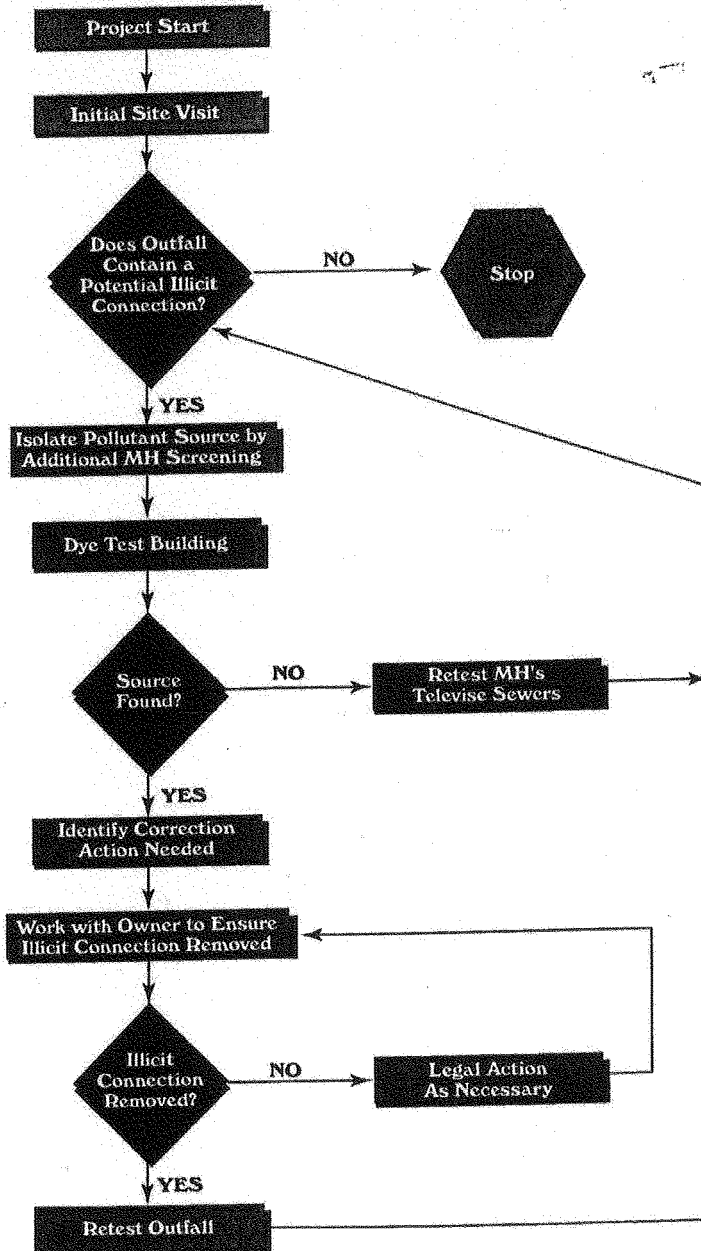
## ACTION

- ☐ None Required
- ☐ Illicit Removed
- ☐ Waiting on Lab Results
- ☐ Dye Test
- ☐ Televise
- ☐ Investigate Further
- ☐ Illicit Connection

Comments



## Illicit Discharge Elimination Program Work Plan Flow Chart



Michigan Drain Cod5 **eff.** 1956

Attachment "A"	Drain Code excerpt
Attachment "B"	PA283 of 1909 excerpt
Attachment "C"	*How to spot Illicit Discharge Brochure
Attachment "D"	(Left Blank)
Attachment "E"	Spill Notification

Attachment "A"  
DRAIN CODE

**280.423 Discharge of certain sewage or waste matter into drains prohibited; construction to purify flow; petitions; order of determination; findings; construction of drain; plans and specifications; contracts; costs; review; acquisition of land; application and fee for sewer connections; connections; powers of drain commissioner or drain board; failure to comply with section; violation as misdemeanor; fine; "person" defined.**

Sec. 423. (1) A person shall not continue to discharge or permit to be discharged into any county drain or intercounty drain of the state any sewage or waste matter capable of producing in the drain detrimental deposits, objectionable odor nuisance, injury to drainage conduits or structures, or capable of producing such pollution of the waters of the state receiving the flow from the drains as to injure livestock, destroy fish life, or be injurious to public health. This section does not prohibit the conveyance of sewage or other waste through drains or sewers that will not produce these injuries and that comply with section 3112 of part 31 (water resources protection) of the natural resources and environmental protection act, Act No. 451 of the Public Acts of 1994, being section 324.3112 of the Michigan Compiled Laws.

(2) Disposal plants, filtration beds, and other mechanical devices to properly purify the flow of any drain may be constructed as a part of any established drain, and the cost of construction shall be paid for in the same manner as provided for in this act for other drainage costs. Plants, beds, or devices may be described in the petition for the location, establishment and construction of drains or in the petition for the cleaning, widening, deepening, straightening, or extending of drains, or in the application for the laying out of a drainage district. Petitions for the construction of plants, beds, and devices for use on any established drain may be filed by the same persons and shall be received and all proceedings on the petitions in the same manner as other petitions for any drainage construction under this act.

(3) If the department of environmental quality determines that sewage or wastes carried by any county or intercounty drain constitutes unlawful discharge as prescribed by section 3109 or 3112 of part 31 of Act No. 451 of the Public Acts of 1994, being sections 324.3109 and 324.3112 of the Michigan Compiled Laws, that 1 or more users of the drain are responsible for the discharge of sewage or other wastes into the drain, and that the cleaning out of the drain or the construction of disposal plants, filtration beds, or other mechanical devices to purify the flow of the drain is necessary, the department of environmental quality may issue to the drain commissioner an order of determination identifying such users and pollutants, under section 3112 of Act No. 451 of the Public Acts of 1994, being section 324.3112 of the Michigan Compiled Laws. The order of determination constitutes a petition calling for the construction of disposal facilities or other appropriate measures by which the unlawful discharge may be abated or purified. The order of determination serving as a petition is in lieu of the determination of necessity by a drainage board pursuant to chapter 20 or 21 or section 122 or 192 or a determination of necessity by a board of determination pursuant to section 72 or 191, whichever is applicable. A copy of the findings of the department shall be attached to the order of determination which shall require no other signature than that of the director of the department of environmental quality. Upon receipt of the order of determination, the drain commissioner or the drainage board shall proceed as provided in this act to locate, establish, and construct a drain. If the responsible users of the drain are determined to be public corporations in the drainage district, the drain commissioner or the drainage board shall proceed as provided in chapters 20 and 21, as may be appropriate, using the order of determination as the final order of determination of the drainage board. If the responsible users are determined to be private Persons, the drain commissioner shall proceed as provided in chapters 8 and 9, using the order of determination as the first order of determination.

(4) Plans and specifications for the construction as part of a drain of any disposal plant, filtration bed, or other mechanical device to properly purify the flow of the drain shall be prepared by the drain commissioner or the drainage board. Contracts for construction shall be let in the manner provided in this

act. To meet the cost of any preliminary engineering studies for the construction of abatement or purification facilities, the drain commissioner or the drainage board shall apportion the cost among the several parcels of land, highways, and municipalities benefited thereby in the same manner as provided in chapter 7 or against the public corporations affected by the order of determination in the same manner as provided in chapters 20 and 21. The costs and charges for maintenance shall be apportioned and assessed each year. If the apportionment is the same as the last recorded apportionment, a day of review' or a hearing on apportionments is not necessary, but if tire apportionment is changed, notice of a day of review or a hearing on apportionment shall be given to each person whose percentage is raised.

(5) Land may be acquired as a site for the construction of such plants, beds, and devices, and releases of land may be obtained in the same manner as provided in this act for other lands acquired for right of way.

(6) A person shall not connect sewage or other waste to a county or intercounty drain except with the written approval of the appropriate commissioner or the drainage board indorsed upon a written application for such service and the payment of a service fee of not to exceed \$50.00 for each connection to a covered drain. The application shall include information showing that all other local, state, and federal approvals related to the sewage or waste have been obtained.

(7) The fee provided for in subsection (6) shall be set and collected by the drain commissioner, as approved by the county board of commissioners or the drainage board, and deposited with the county treasurer, to be credited to the drain fund set up for the maintenance or construction of the drain. The commissioner or the drainage board shall keep a record of applications made and the action on the applications. The commissioner or the drainage board may reject applications for or require such modification in requested applications for sewer connections to county drains as necessary to attain the objectives set forth in this section.

(8) Subject to the review and approval of the department of environmental quality, the drain commissioner or drainage board may study the requirements of persons for flood control or drainage projects including sewage disposal systems, storm sewers, sanitary sewers, combined sanitary and storm sewers, sewage treatment plants, and all other plants, works, instrumentalities, and properties useful in connection with the collection, treatment, and disposal of sewage and industrial wastes or agricultural wastes or run-off, to abate pollution or decrease the danger of flooding. The objective of such studies shall be that sewers, drains, and sewage disposal facilities are made available to persons situated within the territorial limits of any drainage district or proposed drainage district as necessary for the protection of public health and the promotion of the general welfare.

(9) The drainage board or drain commissioner may cooperate, negotiate, and enter into contracts with other governmental units and agencies or with any public or private corporation including the United States of America, and to take such steps and perform **such** acts and execute such documents as may be necessary to take advantage of any act of the congress of the United States which may make available funds for any of the purposes described in this section.

(10) Failure to comply with any of the provisions of this section subjects the offender to the penalties described in section 602. However, for each offense, a person who violates subsection (6) is guilty of a misdemeanor punishable by a fine of not more than \$25,000.00 or imprisonment for not more than 90 days, or both. In addition, the person may be required to pay the costs of prosecution and the costs of any emergency abatement measures taken to protect public health or the environment. Payment of a fine or costs under this subsection does not relieve a person of liability for damage to natural resources or for response activity costs under the natural resources and environmental protection act, Act No. 451 of the Public Acts of 1994, being sections 324.101 to 324.98106 of the Michigan Compiled Laws.

**11) As** used in this section, "person" means an individual, partnership, public or private corporation, association, governmental entity, or other legal entity.

**History:** 1956, Act 40, Imd. Eff. **Mar. 28, 1956** ;--Am. 1972, Act 298, Imd. Eff. Dec. 14, 1972; -b. 1996, Act 60, Imd. Eff. Feb. 26, 1996 ;--Am. 1996, Act 552, Eff. Mar. 31, 1997.



Attach B

**PUBLIC HIGHWAYS AND PRIVATE ROADS (EXCERPT)**

**Act 283 of 1909**

(Act 212 of 1960)

**224.19b Working within right-of-way of county road; permit required; exceptions; permit requirements and schedule of fees; itemization of costs; annual and emergency permits; security.**

Sec. 19b.

(1) A person, partnership, association, corporation or governmental entity shall not construct, operate, maintain or remove a facility or perform any other work within the right of way of a county road except sidewalk installation and repair without first obtaining a permit from the county road commission having jurisdiction over the road and from the township, city or village in which the county road is located when a permit is required by ordinance of the township, city or village, pursuant to authority conferred by article VII, section 29 of the Michigan constitution of 1963. The adjacent property owner shall not be required to obtain a permit for work incidental to the maintenance of the right of way lying outside of the shoulder and roadway.

(2) A county road commission and a local unit of government may adopt after a public hearing of which notice has been given by publication at least twice in a newspaper circulated in the county not more than 30 days nor less than 7 days prior to the hearing, reasonable permit requirements and a schedule of fees to be charged sufficient to cover only the necessary and actual costs applied in a reasonable manner for the issuance of the permit and for review of the proposed activity, inspection and related expenses. After the work authorized in the permit has been completed, itemization of all costs shall be supplied upon request of the permit holder.

(3) When a road commission adopts procedures for the issuance of permits or adopts a schedule of fees in accordance with the provisions of this section, separate procedures and fee schedules shall be adopted for the issuance of annual and emergency permits which reflect the minimal administrative burden of issuing an annual permit for frequent but routine and unobtrusive work such as surveying and the extraordinary emergency repairs to municipal or public utilities.

(4) A county road commission may not refuse a permit requested by a government entity for the installation of a facility or utility owned by that entity if security is given by the permittee or its contractor to the county road commission sufficient to insure restoration of the road and appurtenances thereto and adjacent right of way to a condition reasonably equal to or better than that existing prior to such installation nor may a county road commission charge a government entity a permit fee exceeding \$300.00 per permit or \$1,000.00 total for all permits per project.

**History: Add. 1980, Act 212, Eff. Mar. 31, 1981**

## Attachment "C"








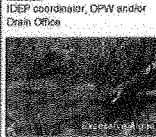


### How to spot an Illicit Discharge Brochure:

This brochure is under development. It is modeled on the alliance of rouge communities IDEP Tip Card. (shown below) It may be used to train staff and can be made available to the public.

- What is an illicit discharge and how to identify
- Hazards associated with illegal discharges
- What to report
- Who to report to

Schedule: PEP subcommittee/ Tetra Tech will have brochure complete by July 1, 2014 for distribution.

**What are the Signs of an Illicit Discharge?**

<b>Sanitary Sewer Discharges</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Sanitary debris</li> <li>• Staining on pipe</li> <li>• Soap suds</li> <li>• Gray or discolored water</li> <li>• Odors: sewage, rotten eggs or detergents</li> </ul> <b>Contact:</b> IDEP coordinator and/or DPW	  	<b>Failed Septic Systems</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Overgrown or wet patch of grass</li> <li>• Cheater pipe to ditch</li> <li>• Soap suds</li> <li>• Gray or discolored water</li> <li>• Odors: sewage, rotten eggs or detergents</li> </ul> <b>Contact:</b> Health Department and/or IDEP coordinator	 
<b>Illegal Dumping, Spills or Floor Drain Connections</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Oil sheen</li> <li>• Stained sediment, rocks or vegetation</li> <li>• Odor, petroleum, chemical</li> </ul> <b>Contact:</b> IDEP coordinator or MDEQ	 	<b>Industrial Discharges</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Discolored water or vegetation</li> <li>• Odor, petroleum, chemical</li> </ul> <b>Contact:</b> IDEP coordinator and/or DPW	
<b>Agricultural Runoff, Fertilizers, or Sanitary Sewer Waste</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Algae growth near drain outlet or in a ditch</li> </ul> <b>Contact:</b> IDEP coordinator, DPW and/or Drain Office		<b>Soil Erosion from Construction Sites</b> <b>Observations:</b> <ul style="list-style-type: none"> <li>• Bare soils or banks with no soil erosion control fencing</li> <li>• Muddy discharge from an outfall</li> </ul> <b>Contact:</b> Local soil erosion control agency (either the local community or county)	

IDEP = Illicit Discharge Elimination Program; DPW = Department of public works/works; MDEQ = Michigan Department of Environmental Quality

### Important Numbers

#### EMERGENCIES

- Police/Fire 911
- MDEQ Pollution Alert System (PEAS) 800-292-4708, 24 hrs

#### NON-EMERGENCIES

<b>Livingston County:</b>	
Health Department	517-548-9858; 8 am - 5 pm
Drain Office	517-548-0040; 8 am - 5 pm
<b>Macomb County:</b>	
Health Department	586-469-5236; 8 am - 5 pm
IDEP Hotline	877-879-4337; after 5 pm
IDEP e-mail	IDEP@macombcountymi.gov
<b>Oakland County</b>	248-858-0931; 24 hrs
<b>St. Clair County</b>	877-504-SWIM (7946); 24 hrs
<b>Washtenaw County</b>	734-222-3880; 8 am - 5 pm
<b>Wayne County</b>	888-223-2363; 24 hrs
Local IDEP Coordinator	_____
Local	_____
Soil Erosion Control Agency	_____

### How to Spot Illicit Discharges A Tip Card for Municipal Staff



An illicit discharge is any discharge containing polluting material, such as sediment, nutrients, oil and bacteria. These discharges can drain to lakes and streams via storm drains. The communities in Southeast Michigan are required to prevent illicit discharges from entering storm water. You can do your part by notifying the appropriate agency when you spot a potential illicit discharge.

### What to Report?

- Spills and contamination to lakes, rivers and streams
- Suspicious dumping to catch basins or waterways
- Unusual discharges from pipes
- Sewage on the ground or draining to surface water
- Large number of dead fish in waterways
- Failing or leaky septic systems
- Polluted runoff from storage piles or dumpsters to catch basins or waterways
- Sewage, detergent, chemical, petroleum or rotten egg odors
- Soil erosion from construction sites

Attachment "E"  
Spill Notification Complaint Reporting Form

Spill Notification Complaint Reporting Form  
 Illicit Discharge Elimination Program  
 Genesee County

Complaint made by: \_\_\_\_\_

Phone #: \_\_\_\_\_

Date: \_\_\_\_\_ Time: \_\_\_\_\_

Location of Discharge: \_\_\_\_\_ Offending Party (if known) \_\_\_\_\_

Nature of Problem (i.e. paper waste, odor, color, etc.): \_\_\_\_\_

Municipality: \_\_\_\_\_

TWP Section where incident occurred: \_\_\_\_\_

Is this an Emergency?

Yes ☐ (Then Phone 911) ☐ No

Nature of Emergency: \_\_\_\_\_

Initial Contact made to:

- 911 \_\_\_\_\_
- Fire Dept. \_\_\_\_\_
- Police Dept. \_\_\_\_\_
- GCDC 732-1590 \_\_\_\_\_
- GCHD 257-3612 \_\_\_\_\_
- GCRC 767-4920 \_\_\_\_\_
- PEAS Hotline (State) 1-800-292-4706 \_\_\_\_\_
- Other \_\_\_\_\_

Additional Comments:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Site Investigation**

Date of Observation: \_\_\_\_\_

Investigating Agency: \_\_\_\_\_

Location of Discharge: \_\_\_\_\_

- ☐ Initial Investigation  
☐ Follow-up Investigation

Crew Members: \_\_\_\_\_

Investigation Location: \_\_\_\_\_

Observations (odor, color, volume, etc): \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Actions Taken:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Danger to health and/or environment:

☐ Yes ☐ No

Were photos taken: ☐ Yes\* ☐ No

Date Corrected: \_\_\_\_\_

\* Please attach copies

If necessary:

Agency Referred to: \_\_\_\_\_

Agency Contact: \_\_\_\_\_

Method of Communication:

☐ E-mail ☐ Letter/memo ☐ Phone

Content of Communication:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Spill Notification Complaint Reporting Form  
Illicit Discharge Elimination Program  
Genesee County

1. Take down complaint information.
2. Fill out the Spill Notification form for the Illicit Discharge Elimination Reporting System.
3. Inform the caller that the problem will be further investigated and thank him/her for calling in.
4. If the problems are related to sanitary please contact the Genesee County Health Department at (810) 257-3612.
5. If the problem is related to oil please phone 911.
6. If the spill/ discharge has released any polluting materials to the surface waters of the State or the ground waters of the State the appropriate district office must be notified immediately. Phone (517) 284-6651, fax: (517) 241-3571. You may call 24-hour Polluting Emergency Alerting System phone # (800) 292-4706 after hours.
7. Please fax completed form to appropriate agency:

Stephanie Kammer at the MDEQ and Genesee County Drain Commissioner  
kammers@michigan.gov c/o Sue Kubic skubic@co.genesee.mi.us  
Phone 517-897-1597 Phone 810-732-1590 Fax (810)732-1474

GCHD: Fax: (810) 257-3125  
GCRC: Fax: (810) 767-5373

## 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 April 1, 2014, we are including a timeline for completion. We understand that it must be adopted before October 1, 2014. Milestones are listed below:

1. Township Attorney will have reviewed and commented by August 15, 2014.
2. Board will have voted by September 15, 2014.
3. It will be adopted by September 15, 2014.
4. Effective date on or before October 1, 2014.

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)*

## Illicit Discharge Ordinance/ Regulatory Mechanism

### Attachment 2 to MDEQ Stormwater Discharge Permit Application

Community Name: Charter Township of Flint

20. Provide the ordinance or regulatory mechanism in effect that prohibits non-stormwater discharges into the applicant's MS4 (except the non-stormwater discharges addressed in Questions 21 and 22).

23. Provide the ordinance or regulatory mechanism that regulates the contribution of pollutants to the applicant's MS4.

24. Provide the ordinance or regulatory mechanism that prohibits illicit discharges, including illicit connections and the direct dumping or disposal of materials into the applicant's MS4.

25. Provide the ordinance or regulatory mechanism with the authority established to inspect, investigate, and monitor suspected illicit discharges into the applicant's MS4.

26. Provide the ordinance or regulatory mechanism that requires and enforces elimination of illicit discharges into the applicant's MS4, including providing the applicant the authority to eliminate the illicit discharge.

Our Community does NOT have an existing Ordinance or regulatory mechanism that would prohibit non-stormwater discharges into our MS4's. (satisfy Questions 20, 23-26) We are currently working on passing/ modifying an Ordinance(s)/ regulatory mechanism(s). Referenced here is a DRAFT of what we are developing/modifying with copies attached.

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- 
- 
- 

Because this is not able to be done by April 1, 2014, we are including a schedule of when it will be completed by. We understand that it must be complete before Oct 1, 2014. Milestones are listed below:

- Municipal Lawyer will have reviewed and commented by this date: Aug. 15, 2014.
- 
- Board will have voted on it by this date: Oct. 1, 2014
- 
- It will be adopted by this date: Oct. 1, 2014
- 
- Effective date: Oct. 15, 2014