

ILLICIT DISCHARGE ELIMINATION PROGRAM (IDEP)



Warren C. Evans
Wayne County Executive

CHARTER COUNTY OF WAYNE
C/O DEPARTMENT OF PUBLIC SERVICES
WATER QUALITY MANAGEMENT DIVISION
400 MONROE, SUITE 400
DETROIT, MI 48226

AUGUST 2019

This document establishes procedures and/or outlines the programs that Wayne County in implementing to meet the minimum control measures required for an Illicit Discharge Elimination Program (IDEP) under the MDEQ Municipal Separate Storm Sewer System (MS4) discharge permit. Wayne County has been implementing the County's SWMP, including our Illicit Discharge Elimination Program (IDEP) in collaboration with watershed partners for many years. These partners include the Alliance of Rouge Communities (ARC), the Alliance of Downriver Watersheds (ADW), Lake St. Clair Direct Drainage Watershed Advisory Group, Friends of the Rouge (FOTR), Friends of the Detroit River (FDR), and Huron River Watershed Council (HRWC). Wayne County will continue to work with partners as future revisions to the SWMP and this IDEP are made. Implementation of this Illicit Discharge Elimination Program will be coordinated by the Wayne County Department of Public (WCDPS) Water Quality Management Division (WQMD).

I. STORM SEWER SYSTEM MAP

The current representation of Wayne County's municipal separate storm sewer system (MS4) is provided in Appendix A along with a listing of Wayne County MS4 outfalls to waters of the state. It should be noted that all "State Trunklines" and "Urban Freeways" shown on the map are owned by the Michigan Department of Transportation (MDOT). Drawings and other information about Wayne County's primary and local roads and related appurtenances are maintained by the Wayne County Department of Public Services and are available from the Engineering Division, 400 Monroe, Detroit, Michigan or may be available from the Roads Division, Central Maintenance Yard, 29900 Goddard Extension, Romulus Michigan. Drawings and other information about enclosed sewers that are established as Wayne County Drains are available from the Wayne County Drain Commissioner, c/o WCDPS Facilities Management Division, 400 Monroe, Suite 300, Detroit, Michigan. Drawings and other information about the County's MS4 associated with County Parks are available from the WCDPS, Parks Division, 33175 Ann Arbor Trail, Westland, Michigan. Additional information about the County's MS4 is available from the WCDPS WQMD.

II. PRIORITIZED AREAS

Working with our watershed partners, WCDPS WQMD developed priority areas for illicit discharge identification and investigation in Wayne County. The Rouge River Collaborative IDEP (see Attachment 2, Figure 1) identifies the current Wayne County priority areas within the Rouge River watershed. Attachment 3 identifies the current Wayne County priority areas within the Alliance of Downriver Watershed area.

III. IDEP ACTION STRATEGIES

Working with watershed partners, Wayne County will continue to implement its overall action strategy to protect and maintain our water resources. Attachment 1 includes a summary of the County's IDEP activities. Attachment 4 presents WCDPS's procedures for responding to illegal dumping and spills, including reporting the release of polluting materials from the WCDPS MS4 to the MDEQ District Office. Section D of Attachment 2, Rouge River Collaborative IDEP, presents a description of IDEP activities that will be carried out in the Rouge River watershed. WQMD staff also worked closely with the ADW to develop the ADW's Collaborative IDEP. Section III of Attachment 3, ADWs Collaborative IDEP, identifies the IDEP activities that will be carried out collaboratively in those watersheds of Wayne County.

IV. PROCEDURE FOR EVALUATING AND DETERMINING EFFECTIVENESS

The WQMD will coordinate internally with WCDPS operating divisions and with the County's watershed partners (e.g., ARC, ADW, FOTR, FDR, HRWC) to track, report, evaluate and determine the effectiveness of the County's IDEP efforts. See the "Methods to Report & Determine Effectiveness" column in the Wayne County IDEP Activity Summary (Attachment 1).

V. OTHER

Any questions on this procedure should be directed to the Storm Water Program Manager.

VI. PROCESS FOR UPDATING/REVISING THIS PROCEDURE

This procedure will be reviewed at least once during the permit cycle by the Storm Water Program Manager for any updates. It is anticipated that this procedure will be revised to reflect the ADW's Collaborative IDEP which is under development and will be available in April 2017.

ATTACHMENTS

Attachment 1	Wayne County IDEP Activities Summary
Attachment 2	Rouge River Collaborative Illicit Discharge Elimination Plan
Attachment 3	Alliance of Downriver Watersheds Collaborative Illicit Discharge Elimination Plan
Attachment 4	Wayne County DPS Procedure for Responding to Illegal Dumping/Spills

ATTACHMENT 1

WAYNE COUNTY IDEP ACTIVITIES SUMMARY

Activity ID	Activity	Required Element Addressed ¹	Procedure/Method of Implementation and Schedule	Method(s) to Report & Determine Effectiveness
ILLCIT DISCHARGE ELIMINATION PROGRAM ACTIVITIES				
WCIDEP1A	Updated Map of Known Storm Water Point Sources and Receiving Waters	7	Wayne County DPS - Water Quality Management Division (WQMD) will continue to maintain and update the digital representation of the County's municipal separate storm sewer system (MS4) including the identification of known storm water discharge points to waters of the state and system BMPs (including catch basins). WCDPS will establish and begin implementing procedures to require all road reconstruction projects to geo-locate BMPs (e.g. catch basins, manufactured treatment systems) and discharge points (outfalls & jurisdictional changes) to waters of the state. Location: County MS4 system-wide. Schedule: Continuous as projects are completed.	An updated map and revised table of crossings and discharge points will be produced annually. Are updates/revisions being identified?
WCIDEP1B	GPS Mapping-County Road Stream Crossing & Best Management Practices	7 & 11	WCDPS has a goal to have a template drafted by October 1, 2019 to be used in developing an asset management plan. The template and plan will address the following basic elements: Asset inventory, Performance Goals, Risk of Failure Analysis and Performance Outcomes. Regarding Asset inventory Wayne County DPS has the following objectives: <ul style="list-style-type: none"> • Starting by May 1, 2019 Geo-locate existing assets on our Road and Bridge Construction projects using County employees. • To accelerate data collection, hire a consultant by July 31, 2019 to assist in geo-locating • By December 20, 2019 have established contract specifications and procedures in place for data collection on major Road and Bridge reconstruction projects to have the hired construction contractor geo-locate BMPs (e.g. catch basins, manufactured treatment systems) and discharge points (outfalls & jurisdictional changes) to waters of the state as part of the "as built" submittal process. • Implement these contract specifications and procedures in our 2020 construction contracts. 	# of crossings, outfalls and best management practices being geo-located will be reported annually. Are the asset inventory objectives being met?
WCIDEP2	Dry Weather Screening-County Road Stream Crossing & Outfalls	11	WQMD will continue to dry weather screen County Road (MS4) stream crossings and collect samples from outfalls with dry weather flow. Advanced investigation efforts will be implemented on outfalls with samples meeting/exceeding the Advanced Investigation thresholds as outlined in the Collaborative ARC & ADW IDEPs. Outfall samples exceeding Collaborative IDEP thresholds for resampling will be resample per the procedure described in the appropriate Collaborative IDEP. Location: Countywide with priority given to County Primary roads. Schedule: Target is to screen 10% of estimated 1,351 Wayne County MS4 road/stream crossing per year (i.e minimum 130 crossings = 300 outfalls per year). Justification of Alternative Approach: People pollute, pipes don't. Wayne County has determined/documented that the most efficient and effective IDEP activities occur "upstream" of where the pipes/sewers discharge. To this end, WCIDEP Procedures 3-13 (combined with our PEP) represent the County's proactive alternative IDEP commitments. These activities have resulted in the prevention of over a billion of gallons polluted stormwater from entering waters of the state and have resulted in and will continue to provide for the proper disposal (or recycling) of millions of pounds of household hazardous wastes and solid waste to prevent them from otherwise becoming an illicit discharge.	# of crossings screened, # of dry weather samples taken, sample results and the # of resamples or Advanced Investigations performed will be reported annually. Are the targetted numbers being met? Are suspicious discharges being identified and illicit discharge sources being identified and eliminated?
WCIDEP3	Collaborative Advanced Investigation and Correction	11-12	WCDPS - WQMD will continue facility dye-testing inspections and/or other advanced investigations in response to priority problem areas identified via instream monitoring and/or citizen complaints on behalf of and in cooperation with our watershed partners. Location: County-wide to maximum extent practicable. Schedule: Ongoing	Data/information will be maintained by the County of all inspections and/or investigations made. The annual report will include a general description of geographic areas covered by the IDEP and the status and outcome of inspections and investigations each year. Effectiveness will be determined based on illicit discharges and illicit connections identified and eliminated as well as the public awareness raised through the inspections and investigations.

Activity ID	Activity	Required Element Addressed ¹	Procedure/Method of Implementation and Schedule	Method(s) to Report & Determine Effectiveness
WCIDEP4	Collaborative Municipal IDEP Training Workshops	15-18	Consistent with the Collaborative IDEP Plans for the ARC and ADW, WQMD will continue to offer Illicit Discharge Elimination Training Courses to our staff and other agency/community staff. Attendees are trained on how to identify and report suspicious discharges including failing septic systems and seepage from sanitary sewers during routine field work or maintenance activities. Current field staff will participate in training at least once per permit cycle and new hires will be trained within the first year. Location: various. Schedule: Annual	# of staff trained will be reported annually by County and by entity. Suspicious discharges reported by municipal/county staff will be investigated and outcome reported as described in Collaborative Complaint Response IDEP activity. Effectiveness will be evaluated based on the training workshop participation, participant feedback and ongoing documentation of discharges reported by municipal/county staff.
WCIDEP5	Collaborative Pollution Complaint Reporting System	13-14	The Wayne County Department of Public Services (WCDPS) operates a 24-hour Hotline number to field and respond to environmental complaints including illegal dumping and suspicious discharges. We promote and our partners promote the use of this hotline number (888-223-2363) for citizens, businesses and/or staff to report illegal dumping or suspicious discharges of any kind. Location: Community-wide. Schedule: Ongoing	Data/records will be maintained on pollution complaints received, their status and outcome. The number of calls received, the number of calls passed on to other jurisdictions, the number investigated by the County and the number of illicit discharges identified as a result of these calls will be reported. Effectiveness will be determined based on complaints received and discharges eliminated or cleaned up.
WCIDEP6	Illicit Discharge Investigation and Correction: Visual Inspections During Routine Field Operations	15,16	Continue inspections of manholes, outfalls, County Drains, waterways and County properties for illicit discharges (including illegal dumping and excessive soil erosion) during routine field operations. Location: Countywide. Schedule: Continuous	# of illicit discharge detected annually by County staff during routine maintenance of properties, right of ways and drainage networks. Annual report will include summary of issues identified and addressed by the various DPS operating divisions. Suspicious discharge and illegal dumping incidents and referrals will be summarized annually. Effectiveness will be determined by the on-going identification and response to illicit discharges and illegal dumping by Wayne County staff during routine field operations.
WCIDEP7	Minimize Infiltration of Seepage from Onsite Sewage Disposal Systems (OSDS)	16	Wayne County will continue enforcement of County OSDS Evaluation & Maintenance Ordinance, which requires inspections and necessary repair of OSDS at time of property transfer. Additional OSDS inspections performed by County in response to complaint or public health threat. County issues permits for construction of new OSDS or for repair to existing OSDS. Location: County-wide. Schedule: Continuous	# of OSDS inspections completed annually under Ordinance or by County personnel. Effectiveness will be based on # failed systems identified and corrected.
WCIDEP8	LRMD Solid Waste Facility Inspections	16	Wayne County knows that the most effective IDEP activities focus on source control/prevention prior to the need to identify illicit discharges. To this end WCIDEP Activities/Procedures 8-10 have been established by the WCDPS - Land Resource Management Division (LRMD). LRMD will perform routine inspections of solid waste facilities to ensure they are being operated correctly and not creating environmental issues including surface water or MS4 impacts. These facilities include solid waste landfills (active & in-active), transfer stations, processing facilities and compost facilities throughout the County. Location: Countywide. Schedule: Active Type II landfills are inspected weekly. Active Type III landfills are inspected monthly. Transfer Stations and Processing Facilities are inspected monthly. Compost facilities are inspected 1 time per month March-November. In-active landfills are inspected quarterly.	# of inspection performed by facility type. # of illicit discharge issues identified/resolved annually. Review inspection policies, procedures and forms to determine the need, or opportunity to make modifications to the inspections to ensure impacts these facilities may have to the County's MS4 system are eliminated or minimized to the maximum extent practicable.
WCIDEP9	Illegal Dumping Control-LRMD's CLEAN Program	16	LRMD will continue to implement the County's Lending Environmental Assistance to Neighborhoods "C.L.E.A.N." Program. Through and annual neighborhood application process the County facilitates the removal of solid waste illegally dumped at a site, and the local community implements measures to prevent future dumping. Location: Countywide. Schedule: Target is 6 per year.	# of events held and volume/amount of material collected and properly disposed. Are the targetted number of events being held. Feedback from participants.

Activity ID	Activity	Required Element Addressed ¹	Procedure/Method of Implementation and Schedule	Method(s) to Report & Determine Effectiveness
WCIDEP10	Illegal Dumping Control-LRMD's HHW Education & Collection Program	16	LRMD will continue to implement the County's Household Hazardous Waste Education and Collection Program. Location: Countywide. Schedule: Target is 4 collections per year.	# of events held and volume/amount of material collected and properly disposed. Are the targetted number of events being held. Feedback from participants.
WCIDEP11	IDEP Training for Volunteers	16	As part of the County's participation in Volunteer Monitoring Programs and events across the County WQMD will support watershed partners to train the citizen volunteers in the identification and reporting of suspicious discharges. Support will be in the form of preparing/updating presentation materials or giving the presentation and/or providing handout materials. Location: Countywide. Schedule: Target is 2 per year.	# of training presentations supported and/or handouts provided per year. Are the targetted number of events being supported. Feedback from participants and partners.
WCIDEP12	Method(s) to Evaluate Effectiveness - Performance Tracking of IDEP Activities	19	For each of the IDEP activities identified in this table, a method of determining effectiveness has been described in the "Method(s) to Report & Determine Effectiveness" column. In summary, records will be kept and an annual summary report developed documenting the performance of the activity. The primary performance measure of effectiveness will be: Are illicit discharges being identified and are they being addressed/eliminated. Location: County-wide. Schedule: Annually	See methods for each activity above. See ARC & ADW Collaborative IDEP biennial reports.
WCIDEP13	Method(s) to Evaluate Effectiveness - Instream/Environmental Indicator Monitoring	16 & 19	To truly evaluate the effectiveness of illicit discharge elimination efforts that support the ultimate watershed management goal of protecting our water resources, the condition and health of the stream must be assessed. To this end and working with our watershed partners, watershed management monitoring programs are underway to assess and evaluate the collective success of all the storm water/watershed management efforts over the long-term. These programs in addition to serving as the true measure of effectiveness will also serve as public education/awareness/stewardship and suspicious discharge identification mechanisms. Location: Rouge & Downriver watersheds. Schedule: Rouge - Target is Spring & Fall macro-invertebrate monitoring events, 15 sites per event; Downriver watersheds - Target is Spring & Fall macro-invertebrate monitoring, 12 sites per event; support volunteer water chemistry monitoring, 8 base and 4 investigative sites twice per month April-September.	Subwatershed macro-invertebrate average scores at least "Fair"; stable or increasing trends. Annual and long-term data will be maintained, analyzed and summarized for water quality conditions. The data analysis summaries will be provided in the County's annual report.

¹ - Defined in State of Michigan Permit Application for Discharge of Storm Water to Surface Waters of the State from a Municipal Separate Storm Sewer System EQP5993 (Rev. 10/2014)

ATTACHMENT 2

ROUGE RIVER COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN

ROUGE RIVER COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN (IDEP)



Prepared by:

***46036 Michigan Ave., Suite 126
Canton, Michigan 48188***

September 25, 2017

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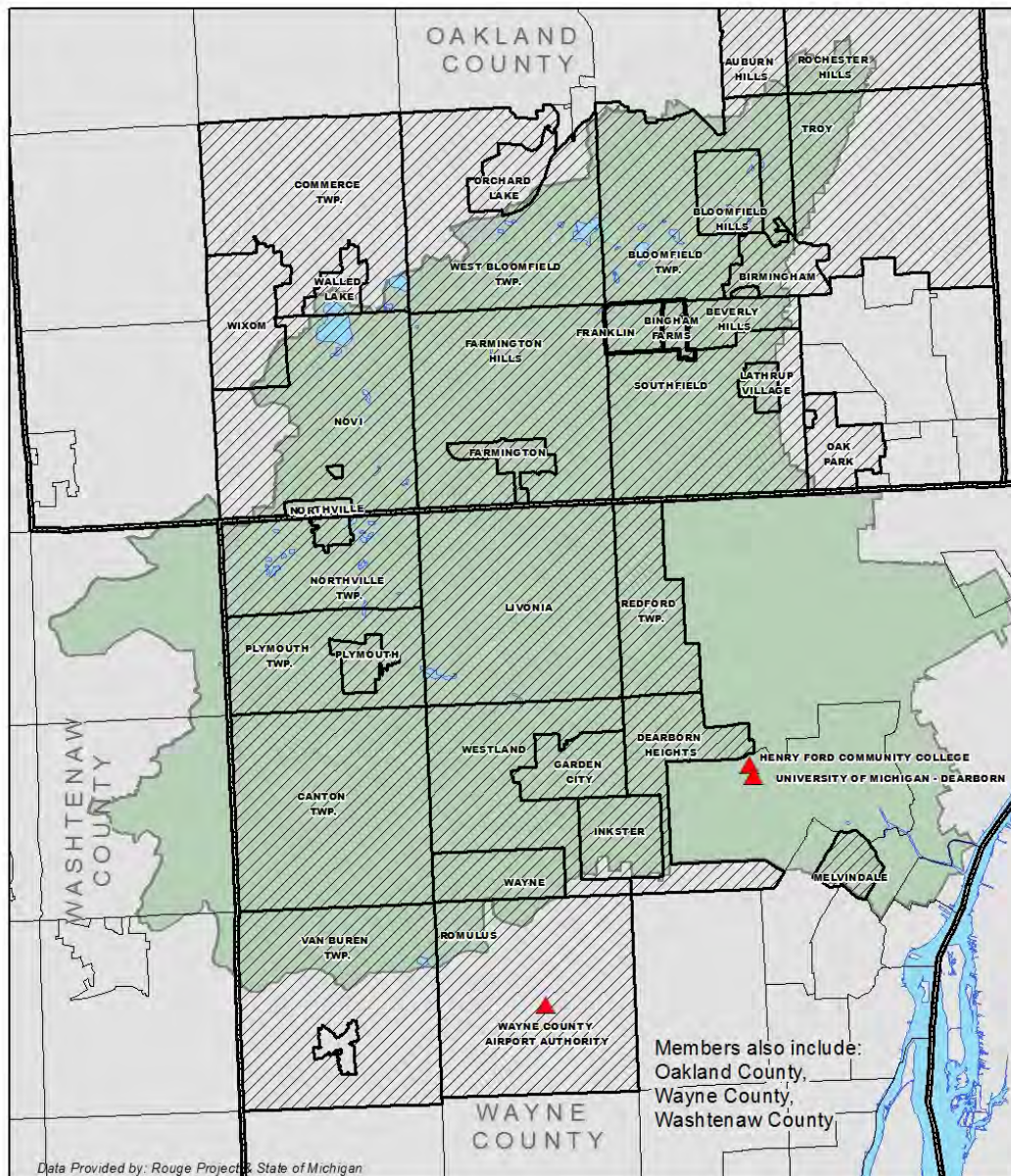
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Attachment B	Rationale for Initial Priority Areas
Attachment C	Outfall Screening Procedure for Identifying Potential Illicit Discharges
Attachment D	Advanced Investigations Procedure for Locating the Source of Suspicious Discharges
Attachment E	Southeast Michigan Regional IDEP Training Plan
Attachment F	Pollution Complaint Tracking Form and Suspicious Observation Form
Attachment G	State and Federal Regulatory Mechanisms

A. Introduction

The Alliance of Rouge Communities¹ (ARC), a 501(c)(3) organization, is a voluntary public watershed entity currently comprised of municipal governments, counties, schools, and cooperating partners as authorized by Part 312 (Watershed Alliances) of the Michigan Natural Resources and Environmental Protection Act (MCL 324.101 to 324.90106) as amended by Act No. 517, Public Acts of 2004. The purpose of the ARC is to provide an institutional mechanism to encourage watershed-wide cooperation and mutual support to meet water quality permit requirements and to restore beneficial uses of the Rouge River to the area residents.



¹ The ARC is currently exploring a merger with Friends of the Rouge. Regardless of the outcome of those investigations, the permittees intend to fulfill the activities outlined in this plan with the assistance of the ARC or the yet to be determined new organization.

This Collaborative Illicit Discharge Elimination Plan (Plan) presents the watershed wide approach that is being implemented to effectively and efficiently address illicit discharges in the Rouge River watershed. This Plan was developed by the Technical Committee of the ARC in response to requirements under the State of Michigan's Permit Application for Discharges of Storm Water to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4) revised October 2015. This Plan is intended to meet the illicit discharge elimination program (IDEP) elements required by the permit. Specifically, this Plan covers questions 7 – 14, and 16 – 26 within the permit application. Item 15 will be addressed in each permittee's individual stormwater management plan.

The two primary goals of the Rouge River Watershed Management Plan (WMP) are Protect Public Health and Reduce Stormwater Runoff Impacts. Bacteria is one of the priority pollutants identified in the WMP and prevents 1.35 million watershed residents from safely recreating (swimming, boating, etc.) in the river and its tributaries. Due to the potential human health impacts indicated by elevated bacteria levels, identifying human sources of *Escherichia coli* (*E. coli*) is the primary focus of this Plan, although other pollutant sources will be investigated as issues are identified.

This Plan will be implemented by the participating communities through the end of the permit cycle for the Rouge River watershed. The list of permittees participating in this Plan can be found in **Attachment A**.

For the purposes of this plan, "ARC staff" will mean the consultant or individual completing the Executive Director Services contract for the ARC. "ARC contractor" will mean consulting firms, municipal agencies or others contracted by the ARC to complete specific tasks. As an example, ARC contractors may include Oakland and Wayne counties and Friends of the Rouge.

B. Background

From 1992 through 2014, the Rouge Project successfully controlled numerous sources of *E. coli* in the watershed. This includes the construction of 88 combined sewer overflow/sanitary sewer overflow control projects, the identification of over 2,008 illicit discharges that have been or are in the process of elimination, and the identification and correction of 898 failed septic systems (RPO, 2014). Nonetheless, there is evidence that human sewage is still impacting the Rouge River and its tributaries based on the data contained in the following studies:

- Total Maximum Daily Load for *E. coli* for the Rouge River (MDEQ, 2007), and
- Alliance of Rouge Communities Bacterial Source Tracking (BST) Final Report (RPO, 2006).

From 2010 through 2015, ARC members have been collaboratively conducting advanced IDEP investigations in targeted areas to locate human sources of *E. coli*. These efforts have led to the identification of 33 illicit connections and 9 illicit discharges that contributed approximately **2.2 million gallons** of untreated wastewater to the river annually (ARC, 2014). Based on our previous success, the ARC recommends this collaborative approach to conducting IDEP activities in the Rouge River watershed.

The ARC's recent IDEP successes build upon the accomplishments of the Rouge River Wet Weather Demonstration Project (Rouge Project) where, since 1987, we have prevented more than **1 billion gallons** of polluted water from entering surface waters just through our facility dye-testing program. This estimate does not include the results of Wayne County's septic system time-of-sale inspection, household hazardous waste, illegal dumping, complaint response, field staff training, monitoring, public education, and pollution prevention good housekeeping (e.g. road sweeping, catch basin cleaning, drain trash rack cleaning, etc.) programs. In 2014 alone, these efforts resulted in more than **13,000 tons** of material being properly disposed of or recycled; and an estimated **4 million gallons** of polluted water being prevented from entering waters of the state county-wide (WCDPS, 2016).

Since 2000, **2,329 municipal staff and thousands of volunteers have been trained** on how to identify and report illicit discharges through the efforts of the ARC, Rouge Project, and Friends of the Rouge (WCDPS, 2016). This has resulted in hundreds of pollution complaint calls from the public and municipal staff which led to the identification of numerous illicit discharges. For example, in 2013, Wayne County responded to 39 pollution complaint calls resulting in the identification of eight illicit discharges (ARC, 2014).

Beyond being a collaborative approach, this Plan meets the Michigan Department of Environmental Quality's (MDEQ) definition of an Alternative Approach as defined within the current permit application guidelines. The primary reason that this Plan is classified Alternative is because it covers multiple permittees who will pool their resources to investigate suspected illicit discharges.

As allowed by the permit, permittees will identify, screen and sample high priority outfalls instead of all outfalls. This will allow for more resources to be targeted to conduct investigations to locate illicit discharge sources. This is being suggested because our experience indicates that individual outfall surveys are inefficient: they identified very few illicit discharges while being very expensive (ARC, 2007). Nonetheless, the permit requires outfall surveys to be completed, so the approach offered herein is a compromise between the permittees and MDEQ.

C. Priority Areas

The ARC has identified several initial priority areas to target which were selected based on available water quality data as described in **Attachment B**. The priority areas are as follows (See **Figures 1 and 2**) and cover almost 25,700 acres which represents 14% of the watershed (based on the separate sewer areas for communities participating in this plan):

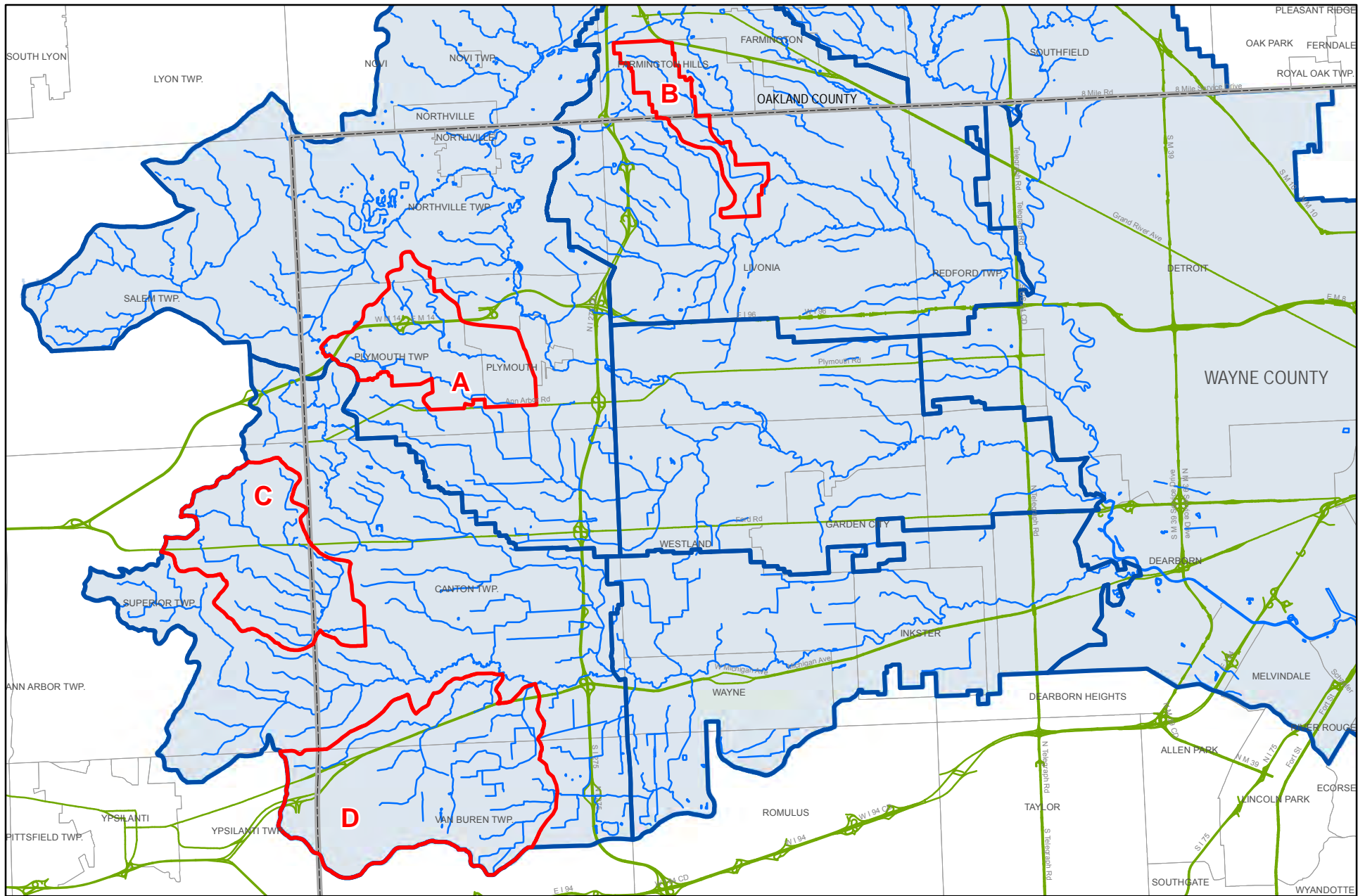
- Initial Wayne County Priority Areas (Figure 1):
 - A. North Branch Tonquish Creek and the Middle Rouge in Plymouth/Plymouth Township from the north side of Joy Road just west of Lilley Road (4,163 acres).
 - B. Tributary to the Bell Branch at the north end of Bicentennial Park which north of 7 Mile Road and west of Gill Road in Livonia (1,730 acres).

- C. Lower Rouge in Canton Township from Proctor and Denton roads west including Superior Township (5,241 acres).
- D. Sines and Arnold Drain in Canton Township at Sheldon Road 0.5 miles north of Michigan Ave and the McKinstry Drain in Canton Township south of Michigan Ave between Lilley and Beck roads including Van Buren and possibly Ypsilanti townships (9,290 acres).
- Initial Oakland County Priority Areas (Figure 2):
 - E. US 16 drainage area in Farmington (200 acres),
 - F. Claude Stevens No. 1, 3, 4 and 10, Bloomfield Highlands and Devonshire drainage areas in Bloomfield Township (784 acres).
 - G. Austin, Eight Mile Road, Fracassi, Flannery and Owens Relief drainage areas in Southfield (3,661 acres)

The ARC is currently in the process of collecting instream *E. coli* data at 90 sites across the watershed. This data will provide the most comprehensive assessment of bacteria conditions in the watershed since 2005. This data will be evaluated and new priority areas will be selected as described in IDEP# 2.

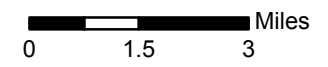
Every 5 years, ARC staff will review available water quality data, outfall screening data and outfalls investigations and reassess the priority areas. ARC staff will identify the priority outfalls and seek input from ARC members. County and municipal staff will review the priority outfalls and their complaint files and add any sites where they suspect the presence of illicit connections/discharges. The draft list will be presented to the Technical Committee for review. Technical Committee input will be addressed and a final priority list will be submitted to the MDEQ for review and approval. The final approved list shall then be distributed for investigations.

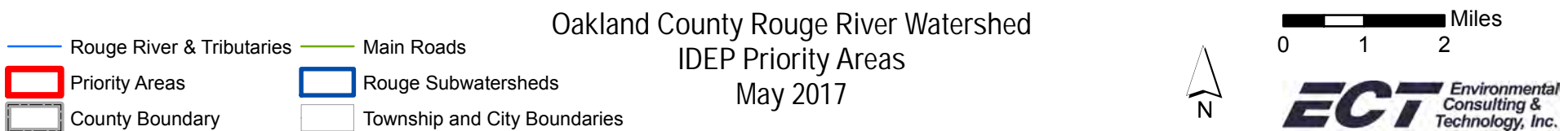
In addition, permittees will have an opportunity to request areas for inclusion on the priority outfall list outside the 5-year cycle. This will occur annually at a Technical Committee meeting and include rationale for inclusion. Committee members will review the request and determine if it should be granted. Considerations for adding a site would include: suspected or known impact to water quality and history of the issue.



Wayne County Rouge River Watershed
 IDEP Priority Areas
 June 2016

- Rouge River & Tributaries
- Main Roads
- Priority Areas
- Rouge Subwatersheds
- County Boundary
- Township and City Boundaries





D. Action Strategies

Each strategy listed in this section includes a description, responsibility and schedule for completion. The Counties, Cities, Villages, Townships, and Schools listed in the Responsibility Sections refer to those who are participating in this Plan as listed in **Attachment A**. The timelines presented herein are contingent on plan approval by October 1, 2017.

IDEP #1: Mapping of Storm Sewer Systems

Description: Storm sewer maps for individual jurisdictions are available in various formats and at various levels of detail. For the purposes of this Plan, a storm sewer map will include the location of outfalls, enclosed and open storm drains, roads, and waters of the state. For each permittee, the physical location of these maps is provided in **Table 1**.

In addition, a watershed-wide GIS database of the storm sewer system maps will be developed. This activity will centralize data and facilitate source-tracking investigations and ease reporting to the MDEQ over time.

For Wayne and Oakland counties, this requirement will be dealt with under their individual stormwater management plans.

ARC Member Responsibilities and Schedule:

- ARC staff:
 - Update the watershed's Storm Sewer GIS by July 30, 2020.
- Cities, Villages, Townships:
 - Convert hard copy storm sewer system maps to GIS format. See schedule in **Table 1**.
 - Provide GIS layers to ARC staff within 6 months of completion or major update of GIS database.

Table 1 – Individual Permittee Storm Sewer System Map and Schedule for GIS

Permittee	Physical Location of Storm Sewer Map(s)	Timeline for GIS Storm Sewer Layer
Municipalities		
Beverly Hills	Oakland County WRC	Spring 2020
Bingham Farms	Oakland County WRC	Complete
Birmingham	Oakland County WRC	Complete
Bloomfield Hills	Department of Public Works	Complete
Bloomfield Twp.	Dave Payne Public Services Building	Complete
Canton Twp.	Department of Public Works	On-going (50% complete)
Dearborn Heights	Department of Public Works	Complete (2007)
Farmington	Department of Public Works	Ongoing, complete by 12/30/19
Farmington Hills	Engineering Department	Complete
Franklin	Oakland County WRC	Spring 2020
Garden City	Department of Public Works	Complete
Inkster	Department of Public Works	Complete
Lathrup Village	Oakland County WRC	Complete
Livonia	Department of Public Works	Complete (2015)

Permittee	Physical Location of Storm Sewer Map(s)	Timeline for GIS Storm Sewer Layer
Melvindale	Department of Public Works	Complete
Northville	Department of Public Works	Ongoing, complete by 12/30/19
Northville Twp.	Department of Public Works	Complete
Novi	Department of Public Works	Complete
Oak Park	Department of Public Works	Complete
Plymouth	Department of Public Works	Complete
Plymouth Twp.	Department of Public Works	Complete
Redford Twp.	Department of Public Works	Spring 2023
Southfield	Department of Public Works	Complete
Troy	Department of Public Works	Complete (updates in progress)
Walled Lake	Department of Public Works	Complete
Wayne	Department of Public Works	Complete
West Bloomfield Twp.	Department of Development Services	Complete
Westland	Department of Public Works	Complete (2015)
Schools		
Henry Ford College	HFC Facilities Building	Spring 2020

BMP goals:

- 100% of IDEP Plan participant outfalls in one GIS database

Measures of assessment:

- Portion of watershed (area) where known outfalls are mapped in GIS.

IDEP #2: Outfall Prioritization and Dry Weather Screening

Description: The goal of this activity is to identify and screen priority outfalls in each city and village. Priority outfalls are those that have a high potential to convey an illicit discharge. ARC staff will review outfall information from each city and village to identify at least 20% of their outfalls for screening. This will be done on an individual community basis. The information reviewed will include the previous outfall screening report, size of the outfall, receiving water quality, age of infrastructure and history of the outfall (past illicit discharges, conversion from combined sewer system, etc.).

The prioritization process will be as follows:

1. Identify waterbodies with dry weather geometric mean *E. coli* > 1,000 cfu/100 mL based on most recent data.
2. Identify the outfalls discharging to these waterbodies including outfall size and drainage area, if available. These outfalls will generally be considered priorities.
3. Identify outfalls that discharge within 2,500 feet of public recreation areas (ex: beaches and paddling sites). These outfalls will generally be considered priorities.
4. Review previous outfall screening reports looking for signs of suspicious discharges that were not resolved. These outfalls will generally be considered priorities.
5. Discuss the history of the outfall with local staff.
 - The history will include age of infrastructure, any previous complaints, illicit discharges or sanitary sewer overflows, and whether it was part of a combined sewer system.
6. Prepare a list of priority outfalls that are most likely contributing to the water quality problem with rationale for inclusion.

Screen the priority outfalls for signs of an illicit discharge following the procedures outlined in **Attachment C**. If dry weather flow is present, sample for *E. coli* or other parameters of concern, unless the source of the flow is identified during the inspection. The sampling will likely occur at the time of the inspection, but there may be instances when the inspectors need to come back to the outfall to collect the sample in order to meet sample collection and analysis protocols. In these cases, the outfall will be revisited within 10 days of discovering the dry weather discharge. If the outfall is not discharging upon the subsequent visit, it will be revisited twice more within 30 days. If there is no discharge after three visits, the outfall will not be screened further.

The outfall screening procedure provided above will also be followed when any new outfalls are discovered or constructed.

Based on the screening results, the outfalls will be divided into four categories as follows:

- Category A. - Outfalls with *E. coli* >10,000 cfu/100 mL or unexplained physical characteristics
- Category B. - Outfalls with *E. coli* between 5,001 and 10,000 cfu/100 mL
- Category C. - Outfalls with *E. coli* between 1,001 and 5,000 cfu/100 mL
- Category D. - Outfalls with *E. coli* ≤1,000 cfu/100 mL

Unexplained physical characteristics include:

- Sanitary debris in the flow or near the outfall structure;
- Colored or turbid discharge;

- Discharges with foul odors;
- Unusual stains or deposits on or near the outfall structure;
- Unusual bacterial sheens, algae or slimes; or
- Dead vegetation immediately downstream of the outfall.

Based on the inspection and sample results, the presence of a suspicious discharge will be determined. A suspicious discharge is presumed when an outfall has unexplained elevated *E. coli* counts (>5,000 cfu/100 ml) or unexplained physical characteristics. These characteristics correspond to the Category A and B outfalls which will be subject to advanced investigations as described in IDEP# 3.

Category C outfalls will be resampled up to two more times within 12 months. If any sample is >5,000 cfu/100 mL, it will be elevated to Category B and investigated accordingly. Category D outfalls will not be further investigated without cause.

For Wayne and Oakland counties, this requirement will be dealt with under their individual stormwater management plans.

ARC Member Responsibilities and Schedule:

- ARC staff:
 - Identify priority outfalls by March 30, 2018
- Cities, Villages
 - Perform dry weather screening (inspection and sampling) of priority outfalls by December 30, 2018.
 - Determine outfalls with suspicious discharges within 30 days of completion of screening of all outfalls in a municipality.
- Cities, Villages, Townships
 - Perform dry weather screening of new outfalls within 6 months of construction, taking ownership or discovery.

BMP goals:

- Screen 100% of priority outfalls

Measures of assessment:

- Number priority outfalls identified
- Number of priority outfalls screened and sampled
- Number of suspicious discharges identified (based on outfall screening results)

IDEP #3: Advanced Investigations

Description: The goal of this activity is to locate the source of the suspected illicit discharge(s). The same process will be followed for the initial priority areas specified in Section C and the priority outfalls identified during dry weather screening. Except in the initial priority areas, the tributary MS4 outfalls will first need to be located and screened for suspicious discharges.

The permittees will lead advanced investigations in their respective jurisdictions. Unless an issue is emanating from township property, investigations within townships will be coordinated with the road agency or their designee. When a potential IDEP issue is suspected outside the participating members' jurisdictions, then it will be referred to the appropriate jurisdiction for their follow-up. The referral will occur in writing and include the rationale for the referral.

Once the priority outfall screening data is available, Category A outfalls will be subject to advanced investigations first as their discharges are expected to have the greatest impact on water quality. The investigation of Category B outfalls will begin when at least 50% of the Category A outfalls in the watershed are investigated.

Advanced investigations will include manhole inspection or sampling, dye-testing sewers or structures, smoke testing sewers, or televising sewers to locate the illicit discharge. These investigations will be conducted according to the procedures outlined in **Figure 3** and **Attachment D**.

In order for a priority outfall to be considered investigated, the following efforts must be completed:

- The tributary MS4 has been sampled/inspected at at least ½ mile intervals;
- Advanced investigations have been conducted for drain segments with *E. coli* >10,000 cfu/100 mL or have physical signs of sewage;
- Sources have been identified in drains segments where *E. coli* is >10,000 cfu/100 mL; and
- Referrals have been made to upstream MS4s when *E. coli* counts from their systems are >10,000 cfu/100 mL; and
- Referrals to other MS4 owners have been investigated by the MS4 owner with documentation sent back to the downstream MS4.

Advanced investigations will be tracked using maps and narrative descriptions of the field work which will be summarized annually in a report to the ARC Technical Committee.

Schedule: Investigate initial priority areas through December 30, 2018.
Investigate priority outfalls through the end of the permit.

ARC Member Responsibilities and Schedule:

Entity/Task	Schedule
ARC staff	
Review and approve annual budgets and county (or contractor) work plans to ensure resources are directed to the appropriate areas.	By Nov. 1 st each year
WCDPS and OCWRC	
Participate in ARC Technical Committee discussions and provide feedback on the appropriateness of the selected priority areas.	Two times per year

Entity/Task	Schedule
Lead advanced investigations in priority areas to the point where the suspicious discharge is narrowed down to the smallest storm sewer segment as practicable by sampling at manhole and outfall locations. (as contracted by the ARC)	Ongoing
Provide recommended next steps to the MS4 owner for continuing the investigations. This will be done in writing (email is a suitable for this purpose).	Within 2 weeks of completing investigations
Track investigation efforts described above.	Ongoing
WCDPS, OCWRC, Cities, Villages, Townships	
Assist the ARC in conducting advanced investigations by providing maps and staff knowledge of the local system.	As needed
Follow-up on the investigation recommendations of the ARC to identify illicit discharge sources within their jurisdiction. This may include televising, smoke testing, dye testing or other investigation measures as the situation requires.	Begin within 4 weeks of receiving the referral from the ARC/county
Report back to ARC on the status of the investigations.	By Dec 30 th each year
Cities, Villages, Townships	
Notify property owners of the presence of an illicit discharge.	Within 2 weeks of verification
Work with property owners to eliminate identified sources per local ordinances/ codes and track correction measures.	As needed
Lead enforcement measures as appropriate.	As needed
Report back to ARC on the number and type of identified illicit discharges.	By Dec 30 th each year
Schools	
Follow-up on the investigation recommendations of the county/community to identify illicit discharge sources. This may include televising, smoke testing, dye testing or other investigation measures as the situation requires.	Begin within 4 weeks of receiving the referral from the county/community
Eliminate identified sources and track correction measures.	As needed
Report back to referring agency on the status of the investigations and the number and type of identified illicit discharges.	By Dec 30 th each year

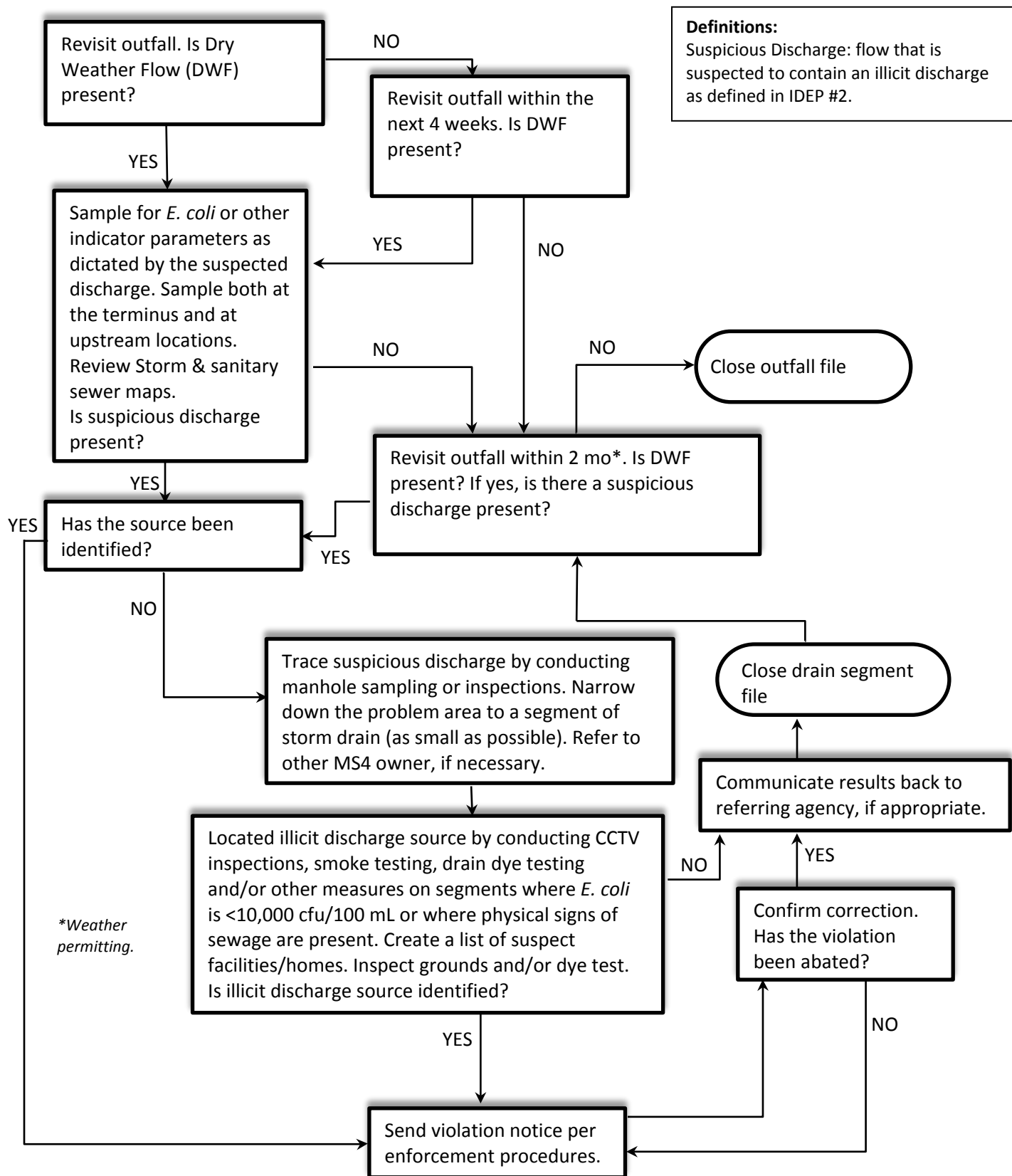
BMP goals:

- Follow the advanced investigation protocol for initial priority areas and priority outfalls.
- 100% of illicit connections/discharges resolved or a plan in place for elimination.

Measures of assessment:

- Portion (square miles/acres) of priority outfall drainage areas in Categories A and B and portion investigated.
- Number and type of illicit connections/discharges identified and resolved.

Figure 3 – Advanced Investigation Protocol



IDEP #4: Staff Training

Description: There are several mechanisms available for IDEP training for various competencies as described below. Each permittee will have at least one person trained at the Investigator Level and 50% of field staff at the Alert Observer Level. Field staff is defined as those working at least 50% of their day out-of-the-office and includes Department of Public Works/Services staff and community building/plumbing inspectors.

Investigator Level

The Wayne County Illicit Discharge Investigator Training (a half day training workshop) where attendees are taught how to identify and investigate the sources of illicit discharges including failing septic systems, seepage from sanitary sewers, illegal dumping, and suspicious discharges from outfalls. A competency exam is also administered at the end of the workshop.

Alert Observer Level

Training at this level can consist of one of the following:

- The Alert Observer IDEP Training (a 30 minute to 1 hour workshop) which provides the goals of the IDEP program, how to recognize illicit discharges and conduct field screenings, and the mechanisms to report suspicious discharges.
- The *Working for Clean Water* municipal staff training (a 15-minute video) where attendees are provided a general overview of the IDEP program, how to recognize illicit discharges, encouraged to report suspicious discharges, and provides pollution prevention and good housekeeping best management practices.

In addition, an IDEP Tip Card for Municipal Staff, which was developed by the Southeast Michigan IDEP Work Group, will be provided to field staff for both training programs. The Tip Card provides photographic examples of illicit discharges and phone numbers to report complaints.

Each community and county already has at least one person who is trained at the Investigator Level. This level of training will be maintained. Wayne County and ARC staff will continue to offer the Investigator Training Workshop to ARC member staff and its regional partners every other year according to the Southeast Michigan Regional IDEP Training Plan (See **Attachment E**). ARC staff will look to extend the training plan another 5 years.

The Working for Clean Water video is available on the ARC's website (<http://www.allianceofrougecommunities.com/activitiesevents.html>) or by searching "IDEP Municipal Training" on www.YouTube.com. The Alert Observer Training Workshop will be included in the municipal pollution prevention training every other year according to the IDEP Training Plan (See **Attachment E**). Additional training opportunities can be arranged if demand warrants. The Tip Card will be distributed at the Investigator and Alert Observer trainings and can be obtained on the ARC's website (see previous link) or by emailing ARC staff, if customization is desired.

Schedule: One person trained at the Investigator Level, confirm annually by July 30th.
50% of field staff will be trained at the Alert Observer Level by March 31, 2021.
Remind staff of *E. coli* problems in Priority Areas and encourage reporting, once a year.

ARC Member Responsibilities:

- ARC staff

- Provide trainers for the Investigator and Alert Observer training workshops per the IDEP Training Plan or every year (rotating the workshops every other year)
- Customize the Tip Card, if requested by a permittee.
- Maintain a list of IDEP Investigator contacts.
- Seek to extend the Southeast Michigan Regional Training Plan through 2022. Complete by December 30, 2017.
- Cities, Villages, Townships, Road Agencies, WCDPS, OCWRC and Schools
 - Provide IDEP training to field staff.
 - Provide ARC staff the name of the person trained at the Investigator Level.
 - Provide field staff the IDEP Tip Card for Municipal Staff in conjunction with the training sessions.
 - Document and track staff training needs.
 - For permittees in Priority Areas, remind staff of the *E. coli* problem and encourage the reporting of pollution complaints.

BMP goals:

- 1 person per MS4 trained at Investigator Level.
- 50% of field staff trained at the Alert Observer Level.

Measures of assessment:

- Number of staff trained at various competencies.

IDEP #5: Pollution Complaint Response

Description: Oakland, Wayne, and Washtenaw counties operate environmental hotline numbers and respond to environmental complaints including illegal dumping, spills and suspicious discharges. Local communities also receive pollution complaints directly from residents. As discussed in the ARC Collaborative PEP, local communities (cities, villages, and townships) will promote the use of the hotline numbers to their residents and general public and assist with and/or perform follow up complaint response as appropriate. Community staff may identify a potential pollution issue during their day-to-day activities. These issues will be reported, investigated and tracked just like a pollution complaint from a resident. It should be noted that suspicious discharges within townships, not on township property, will be handled by the county road agency or their designee.

Investigative responses will range from a site visit that fails to confirm a problem to full scale advanced investigation to identify the source of the illicit discharge. When responding to complaints staff will use the Advanced Investigation process outlined in **Figure 3**. For non-emergency spills, the initial complaint response will begin within 48 hours of notification and within regular working hours. Emergency spills will be handled immediately. The spill response protocol for handling complaints, spills and illegal dumping is permittee-specific and, as such, is outlined in each permittee's Stormwater Management Plan.

Any other nonpriority area investigations will also be handled as described in **Figure 3**.

ARC Member Responsibilities and Schedule:

Entity/Task	Schedule
ARC staff	
Maintain a list of IDEP community contacts and update.	By July 30 th each year
Cities, Villages, Townships, Road Agencies and Schools	
Provide ARC staff with a contact person for addressing pollution complaints.	By July 30 th each year
Track status of complaints using the Spill Notification & Complaint Response form (See Attachment F) or similar form. This will include complaints handled internally or those referred by the county.	As they arise.
Investigate and resolve complaints within their MS4.	As they arise.
WCDPS and OCWRC	
Provide technical guidance as requested by local communities.	As requested
Track the status of any pollution complaints that they investigate.	As they arise.
Investigate and resolve complaints within their MS4.	As they arise.

BMP goals:

100% of complaints addressed

Measures of assessment:

- Number of complaints received and referred or investigated.
- Number of issues identified.
- Number of issues resolved.

IDEP #6: Inspection of ARC Member-Owned Facilities

Description: Dye-testing will be conducted on ARC member-owned or operated facilities (within the watershed) for the purpose of identifying any illicit connections or illicit discharges. Each facility will be tested at least once. Facilities that undergo major renovation or reconstruction will be re-dye tested, as well. Any identified issues will be corrected by owner.

ARC Member Responsibilities and Schedule:

Entity/Task	Schedule
Cities, Villages, Townships, Road Agencies, WCDPS, OCWRC and Schools	
Dye test permittee-owned/operated facilities.	See Table 2
Dye test permittee-owned/operated facilities that undergo major renovation.	Within 6 months of completion of construction
Repair/correct illicit connections/discharges that were revealed during the site inspection. If the discharge is significant, take immediate steps to stop the illicit discharge.	As needed

Table 2 – Schedule for Initial Municipal Facility Dye Testing

Permittee (listed alphabetically)	Timeline
Municipalities	
Beverly Hills	By Dec 30, 2018
Bingham Farms	NA-1
Birmingham (golf courses only)	By Dec 30, 2018
Bloomfield Hills	By Dec 30, 2018
Bloomfield Twp.	Completed
Canton Twp.	Completed
Dearborn Heights	Completed
Farmington	Completed
Farmington Hills	Completed
Franklin	Completed
Garden City	Completed
Inkster	Completed
Lathrup Village	By Dec 30, 2018
Livonia	Completed
Melvindale	Completed
Northville	Completed
Northville Twp.	Completed
Novi	By Dec 30, 2018
Oak Park	NA-2
Plymouth	Completed
Plymouth Twp.	Completed
Redford Twp.	Completed
Southfield	Completed
Troy	NA-2
Walled Lake	By Dec 30, 2018
Wayne	Completed

Permittee (listed alphabetically)	Timeline
Westland	Completed
Counties	
Wayne County	Completed
Schools	
Henry Ford College	Completed

NA-1=Not applicable because there are no municipal facilities.

NA-2=Not applicable because municipal facilities are not located in the watershed.

BMP goals:

- 100% of ARC Member existing facilities dye tested.
- 100% of issues addressed.

Measures of assessment:

- Number of facilities dye tested.
- Number of issues identified.
- Number of issues resolved.

IDEP #7: IDEP Work Group

Description: A work group will meet twice per year to discuss IDEP-related topics including the annual advanced investigations work plan, progress of advanced investigations, lessons learned, any road blocks encounter with implementing the plan, and recommendations for improving the plan. The group will be comprised of MS4 permittees and be facilitated by ARC staff. Permit participation will be tracked with a sign-in sheet. A summary of the meeting will be prepared and distributed to the group.

Schedule: Two work group meetings per year.

ARC Member Responsibilities:

- ARC staff
 - Schedule and facilitate meetings in cooperation with the Technical Committee Chair
- Cities, Villages, Townships, Road Agencies, WCDPS, OCWRC and Schools
 - Participate in meetings.

BMP goals:

- Hold at least 2 work group meetings per year.
- 80% member participation.
- 2 meeting summaries per year.

Measures of assessment:

- Number of meetings per year.
- Number of members in attendance at meetings.
- Number of meeting summaries.

IDEP #8: Legal Authority

Description: The legal authority that allows permittees to prohibit, investigate and/or enforce the correction of illicit discharges varies depending on the nature of the discharge in question and the jurisdiction of the MS4. For discharges to city and village MS4s, the legal authority is granted via the Plumbing Code, Sewer Use Ordinances, Nuisance Ordinances, and Municipal Civil Infraction Ordinances. Schools and county departments will follow their written policies or codes, as appropriate. **Table 3** provides the list of regulatory mechanisms by type of illicit discharge that are available to local, school and county agencies to investigate and eliminate illicit discharges. In some cases, permittees can seek the assistance of state and federal agencies to investigate and eliminate illicit discharges. Examples include sewage discharges from mobile home parks, discharges from non-municipal facilities that have a NPDES permit and agricultural properties as shown in **Table 4**.

Table 3 – IDEP Regulatory Mechanisms available to Permittees

Discharge Type or Source	Lead Enforcement Agency	Regulatory Authority
Discharges to city and village MS4s (except as noted below)	Local DPWs and Building Depts.	Varies by community. See individual stormwater management plans.
Discharges to school or township MS4s	School or Township	See individual stormwater management plans.
Sanitary sewage and waste matter into County Drains	County Drain or Water Resource Commissions	<p>Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of \$25,000 or imprisonment.</p> <p>See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code at: http://legislature.mi.gov/doc.aspx?mcl-280-423</p> <p>See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: http://www.legislature.mi.gov/%28S%28fpcdzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&objectName=mcl-280-421.</p>
Discharges to County Road Drains	Road Agencies	Public Highways and Private Roads Act 283, 1909 Sect. 224.19b
Soil Erosion from Construction Sites	Part 91 Authority	Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994

Discharge Type or Source	Lead Enforcement Agency	Regulatory Authority
Discharges from Onsite Sewage Disposal Systems (OSDS)	Wayne County Dept. of Health, Veterans & Community Wellness Oakland County Health Division	<p><u>Wayne County:</u> http://www.waynecounty.com/hhs/onsite_sewage.htm <i>Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta</i> as follows: -Prohibit discharges: Article III, Sec. 3.1-3.2 -Right to inspect: Article IV, Sec. 4.3 -Corrective action: Article IV, Sec. 4.5-4.7 -Penalties: Article XVI, Sec. 16.1 <i>Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance</i> as follows: -Right to inspect: Sec. 803 -Corrective action: Sec. 802 -Penalties: Sec. 804-815</p> <p><u>Oakland County:</u> Oakland County Sanitary Code -Article III, Sect 2.1-2.2 Public Health Code, Public Act 306 of 1927, Sect. 327.201</p>

Source: Modified from a table included in the Oakland County's MS4 permit application

Table 4 – IDEP Regulatory Mechanisms available to State and Federal Agencies to assist Permittees

Discharge Type or Source	State or Federal Enforcement Agency	Regulatory Authority
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987 http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-96-of-1987.pdf
Discharges from Part 5 facilities and industrial NPDES regulated facilities	MDEQ-WRD	Part 31, NREPA, PA 451 of 1994
Discharges from agricultural properties and livestock facilities	MDARD	Michigan Right to Farm Act, Public Act 93 of 1981
Releases of Oil and Polluting Materials, Sewage, Flammable and Combustible Liquids, Hazardous Materials, Hazardous Substances, Infectious Substances, Hazardous Wastes, Leaking Above Ground and Underground Storage Tanks, Bulk Commercial Fertilizers and Pesticides, and Liquid Industrial Wastes	MDEQ - WRD & RRD, USEPA, USCG, NRCS, USDOT, MSP, Local Police & Fire Depts., LEPC, LARA, MDARD, Local Health Dept., and CDC	See Attachment G for appropriate regulatory authority

Notes: CDC = Center for Disease Control, LARA= Michigan Dept. of Licensing and Regulatory Affairs, LEPC=Local Emergency Planning Commission, MDA=Michigan Dept. of Agriculture & Rural Development, MDEQ WRD=Michigan Dept. of Environmental Quality Water Resources Division, MDEQ RRD= MDEQ Remediation and Redevelopment Division, MDLEG=Michigan Dept. of Labor and Economic Growth, MSP=Michigan State Police, NRCS=Natural Resources Conservation Service, USCG=US Coast Guard, USDOT=US Dept. of Transportation, USEPA=US Environmental Protection Agency. Source: Oakland County Water Resources Commissioner's Office

E. Corrective Action Notification

The procedure for responding to illicit discharges will vary depending on the nature of the discharge (ex: illicit connection to a storm sewer, failing septic system, illegal dumping, etc.) and jurisdiction of the discharge. Similarly, the timeline for eliminating a discharge will vary depending on the geographic extent of the issue, the complexity of the corrective action, responsible party's financial constraints, etc. Deviations to the procedures below may be made on a case by case basis and will be documented in the IDEP record and in the Permit Progress Report. In all cases, corrective action measures will be implemented to the maximum extent practicable and as soon as practicable. The status of corrective actions will be included in the Permit Progress Report to the MDEQ.

E.1. Discharges from Private Sources to MS4s

If the source of an illicit discharge has been determined to be privately owned, discharging to a MS4 and regulated by the MS4, the MS4 owner (city, village, county) will use the procedure below to notify and correct the illicit discharge.

It should be noted that discharges to drains within townships are typically under the jurisdiction of the county road agency. However, corrective action and enforcement for discharges to their MS4 is handled under the local jurisdiction's codes and ordinances, the county health department's sanitary code or other appropriate regulatory authority. In these situations, corrective action notification and enforcement will be led by the township who will coordinate with the health department or other agencies, as needed.

First Notice: Notification of Problem and Correction Needed

Once the source(s) of an illicit discharge has been identified, the MS4 owner will provide the first written notice to the responsible party of the illicit discharge by registered mail within 7 days. The first written notice will notify the responsible party of the illicit discharge, the MS4 owner's regulatory authority to require correction, and the potential enforcement actions if the discharge is not addressed. The responsible party will be required to contact the MS4 owner regarding plans for correction within 14 days. Tracking of all notifications and documentation of registered mail receipts shall be retained by the MS4 owner.

Final Notice

If 14 days have passed from the date of the 1st written notice and no response has been received from the responsible party, a second written notice will be sent. The second written notice will remind the responsible party of the illicit discharge, the prior notice, the regulatory authority to require correction, and the potential enforcement actions that will occur if the discharge is not addressed. The responsible party will be given an additional 14 days to contact the MS4 owner regarding plans for correction.

Enforcement

If 30 days have passed from the date of the first written notice, a citation will be issued. The MS4 owner will issue civil infractions as described in the Enforcement Response Procedure (ERP) for the violation of the applicable IDEP-related ordinances as listed in individual permittee stormwater management plans. A citation shall include fines and may require a court appearance.

Corrections/Repairs

In the event that the owner does not contact the MS4 owner within 14 days of the Final Notice and/or the discharge is not addressed by the owner 30 days after civil infractions have been issued, the MS4 owner will pursue other enforcement actions such as: discontinue water service to the property and designate the property uninhabitable, place a lien on the property, and initiate efforts to complete the necessary repairs, as authorized by law.

E.2. Discharges from Public Properties to MS4s

If the discharge is emanating from a public property (other than the permittee's property), the MS4 owner will request correction or a written corrective action plan be submitted within 60 days of notification. If the discharge cannot be corrected within 60 days of notification, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water. The corrective action plan will include a schedule for completion with a goal of completion within 18 months of plan approval. The plan will be reviewed by the MS4 owner within 60 days and approved or denied with explanation. Approval of the plan will not waive any local permitting requirements of the community.

E.3. Discharges from Permittee's Properties

For discharges emanating from the permittee's own property, a corrective action plan will be developed within 60 days of discovery of the discharge. The plan will include a schedule for completion with a goal of completion within 18 months of plan completion. If the discharge cannot be corrected within 60 days of discovery, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water.

E.4. Discharges from Septic Systems

For illicit discharges from failed septic systems, the corrective action procedures of the respective county health departments will be followed. These procedures are documented in the counties' stormwater management plans.

For all other types of discharges, the notification and corrective action procedures will be handled by the lead state or federal agency as identified in **Table 4**.

F. Evaluating Effectiveness

Records for each of the previous IDEP activities will be kept and a summary report will be prepared by ARC staff documenting the tracking metrics indicated in Section D and summarized in **Table 5**. This information will be included in the permittee's Progress Report to the MDEQ. The findings contained within the summary report will also be discussed at a IDEP Work Group meeting.

Table 5 – Tracking Metrics for Evaluating Effectiveness

Item	BMP	Goal	Tracking Measure
A.	IDEP #1: Mapping	100% of permittee outfalls in one GIS database	Portion of watershed (area) where known outfalls are mapped in GIS
B.	IDEP #2: Outfall Prioritization and Dry Weather Screening	Screen 100% of priority outfalls.	Number priority outfalls identified. Number of priority outfalls screened and sampled. Number of suspicious discharges identified (based on outfall screening results).
C.	IDEP #3: Advanced Investigations	Follow the advanced investigation protocol for initial priority areas and priority outfalls. 100% of illicit connections/discharges resolved	Portion (square miles/acres) of priority outfall drainage areas in Categories A and B and portion investigated. Number and type of Illicit connections/discharges identified and resolved.
D.	IDEP #4: Staff Training	1 person per MS4 trained at the Investigator level. 50% of field staff trained at the Alert Observer Level.	Number of staff trained at various competencies.
E.	IDEP #5: Pollution Complaints	100% of complaints addressed	Number of complaints received and referred or investigated. Number of issues identified. Number of issues resolved.
F.	IDEP #6: Inspection of Member Facilities	100% of existing facilities dye tested. 100% of issues addressed.	Number of facilities dye tested. Number of issues identified. Number of issues resolved.
G.	IDEP #7: IDEP Work Group	2 meetings per year. 80% member participation. 2 meeting summaries per year.	Number of meetings per year. Number of members in attendance at meetings. Number of meeting summaries.

Schedule: Metric Summary Report: Due biennially by February 28th starting in 2018.
 Watershed-wide Assessment Report: Due every 10 years by June 30th starting in 2018.

ARC Member Responsibilities:

- ARC staff
 - Keep records on Items A, B and H and incorporate into the a biennial IDEP progress report.
 - Collect tracking metrics data from permittees as described below and produce a biennial IDEP progress report.

- Counties (road agencies, WCDPS and OCWRC)
 - Keep records of Items #C, D, E, F and G as listed in Table 5 and provide the information to ARC staff every two years for the IDEP progress report.
- Cities and Villages
 - Keep records of Items #D, E, F and G as listed in Table 5 and provide the information to ARC staff every two years for the IDEP progress report.
- Townships and Schools
 - Keep records of Items #D, F and G as listed in Table 5 and provide the information to ARC staff every two years for the IDEP progress Report.

G. References

- Alliance of Rouge Communities (ARC). *Comparison Analysis of Alternatives to finding Illicit Discharges to Storm Water Systems Final Report*. RPO-WMGT-TR66. February 2007.
- Alliance of Rouge Communities (ARC). *ARC-Funded IDEP Activities: Summary of Efforts* (presentation to the Full ARC). May 19, 2014.
- Alliance of Rouge Communities (ARC). Full ARC Meeting Agenda/Handouts and Summary. November 1, 2011.
- Alliance of Rouge Communities (ARC). Full ARC Meeting Agenda/Handouts and Summary. November 7, 2012.
- Alliance of Rouge Communities (ARC). Full ARC Meeting Agenda/Handouts and Summary. November 21, 2013.
- Alliance of Rouge Communities (ARC). Full ARC Meeting Agenda/Handouts and Summary. November 10, 2014b.
- Alliance of Rouge Communities (ARC). Full ARC Meeting Agenda/Handouts and Summary. November 18, 2015.
- Michigan Department of Environmental Quality (MDEQ). *Total Maximum Daily Load for the Rouge River, Wayne and Oakland Counties, Michigan*. August 2007.
- Michigan Department of Environmental Quality (MDEQ) and Michigan Department of Licensing & Regulatory Affairs (LARA). *Michigan Guide to Environmental, Health, and Safety Regulations, 8th Edition*. June 2014.
- Rouge Program Office (RPO). *Alliance of Rouge Communities Bacterial Source Tracking Final Report*. (URBSW7.27). December 2006.
- Rouge Program Office (RPO). *Rouge River Restoration Summary: Wayne County Rouge River National Wet Weather Demonstration Project 1992 - 2014*. Undated.
- Wayne County Department of Public Services. *Compliance Report: January 1, 2014 – December 31, 2015 Wayne County Certificate of Coverage (COC) MIG610040 General Storm Water Discharge Permit MIG619000 - Draft*. February 29, 2016.

Attachment A

Participating ARC Members

Permittees	
Communities	
Beverly Hills, Village of	Northville, City of
Bingham Farms, Village of	Northville Township
Birmingham, City of	Novi, City of
Bloomfield Hills, City of	Oak Park, City of
Bloomfield Township	Plymouth, City of
Canton Township	Plymouth Township
Dearborn Heights, City of	Redford Township
Farmington, City of	Southfield, City of
Farmington Hills, City of	Troy, City of
Franklin, Village of	Walled Lake, City of
Garden City, City of	Wayne, City of
Inkster, City of	Westland, City of
Lathrup Village, City of	West Bloomfield Township
Livonia, City of	
Melvindale, City of	
Counties	
Oakland County*	
Wayne County*	
Schools	
Henry Ford College	

**Participating in this Plan, but their commitments are outlined in their individual stormwater management plan which is pending MDEQ approval.*

Attachment B

Rationale for Initial Priority Areas

The Rouge River *E. coli* TMDL was reviewed and water quality data collected by Oakland County Water Resources Commissioners Office (OCWRC) and Wayne County Department of Public Services (WCDPS) were analyzed by ARC staff to determine the initial priority areas for illicit discharge investigations. The process used for each county was the similar; however, OCWRC had a more robust data set than WCDPS. The detailed approaches and results are described below for each county.

Wayne County

In 2015, WCDPS sampled the river for *E. coli*. The sampling locations was based on the data from the Rouge River *E. coli* TMDL which identified three sites in Wayne County with elevated dry weather *E. coli* counts with human DNA biomarkers present. These sites were:

- U15-Bell Branch u/s of 6 Mile Road, within Livonia,
- D62-Tonquish Creek u/s of Joy Road within Plymouth and Plymouth Twp,
- G97-Lower Branch u/s of Henry Ruff Road within Wayne, Westland, Romulus and the Lower 1 communities of Canton Twp, Plymouth Twp and Van Buren Twp.

Approximately 50 samples were collected at and upstream of these locations during dry conditions (see Appendix A). Several sites had *E. coli* counts above 1,000 cfu/100 mL as shown in Table 1. These sites have been grouped into four areas (Tonquish Creek, Bell Branch Tributary, Lower Rouge, and McKinstry and Sines and Arnold Drains) totaling 21,054 acres (33 sq miles).

Table 1. Wayne County Locations with *E. coli* above 1,000 cfu/100 mL (data from 2015)

Site ID	<i>E. coli</i> Count (cfu/100 mL)	Site Description
Tonquish Creek (4,163 acres)		
D62	1,483	Tonquish Creek at Joy Rd
D62A	1,145 3,255	N. Branch Tonquish at Ford St
D62C	3,654 6,867	S. Branch Tonquish at Main St
D62C.1	>24,196 72,700	Outfall N. side of S. Branch at Harvey St.
D62C.2	>24,192	Crestwood Condos E. of Sheldon
D62D	1,210	S. Branch at Ann Rd (west of Sheldon).
Bell Branch Tributary (1,730 acres)		
U15B	2,187	Tributary to the Bell Branch at the north end of Bicentennial Park which north of 7 Mile Road and west of Gill Road in Livonia
Lower Rouge (5,241 acres)		
G200	1,314	Lower Rouge in Canton Township from Proctor and Denton roads west including Superior Township
G200.1	4,106	Lower Rouge west of Ridge Rd. (DeStanCo property)
McKinstry Drain and Sines and Arnold Drain (9,920 acres)		
L51	4,884	McKinstry Drain at Michigan Ave.
L51A	1,336	McKinstry Drain at Sheldon Rd.
G94A	1,046	Sines and Arnold Drain at Beck Rd.

Based on this data, the following priority areas are recommended for illicit discharge investigations in Wayne County (Figure 1):

- A. Tonquish Creek upstream of Joy Road in Plymouth and Plymouth Township. This includes the South Branch from the confluence to Plymouth Park and North Branch from the confluence to Sheldon Road.
- B. Tributary to the Bell Branch at the north end of Bicentennial Park which is north of 7 Mile Road and west of Gill Road in Livonia.
- C. Lower Rouge in Canton Township from Proctor and Denton roads west including Superior Township.
- D. Sines and Arnold Drain in Canton Township at Sheldon Road 0.5 miles north of Michigan Ave and the McKinstry Drain in Canton Township south of Michigan Ave between Lilley and Beck roads including Van Buren and possibly Ypsilanti townships.

Oakland County

OCWRC has been collecting *E. coli* data at select locations since 1999. Samples are collected during dry weather conditions and prioritized (Category A, B, C, or D) for additional sampling according to OCWRC's Dry Weather Screening and Prioritization Criteria (Appendix B). The resulting dry weather screening data are shown in Appendix C. Waterbodies that fell into Categories C and D are shown in Table 2.

Table 2. Oakland County Locations in OCWRC Prioritization Categories C and D

OCWRC Category	Waterbody	Average <i>E. coli</i> (cfu/100 mL)	Notes
CAT D	AUSTIN DRAIN	2,005	
CAT C	BLOOMFIELD HIGHLANDS DRAIN	2,121	
CAT D	CLARENCEVILLE DRAIN	1,666	[1]
CAT C	CLAUDE H. STEVENS NO.1 DRAIN	1,371	
CAT C	CLAUDE H. STEVENS NO.10 DRAIN	1,748	
CAT D	CLAUDE H. STEVENS NO.3 DRAIN	7,194	
CAT C	CLAUDE H. STEVENS NO.4 DRAIN	10,909	
CAT C	DEVONSHIRE DRAIN	1,181	
CAT C	EIGHT MILE DRAIN	1,940	
CAT C	FLANNERY DRAIN	1,765	
CAT C	FRACASSI	14,240	
CAT D	HAZEL DRAIN	309	[1]
CAT D	LAW DRAIN	351 – 20,671	[1]
CAT C	OWENS RELIEF DRAIN (BRANCH B)	7,095	
CAT D	OXFORD AVE. DRAIN	4,432	[1]
CAT D	PEARL STREET DRAIN	87,739	[1]
CAT D	U.S. 16 DRAIN	2,269	

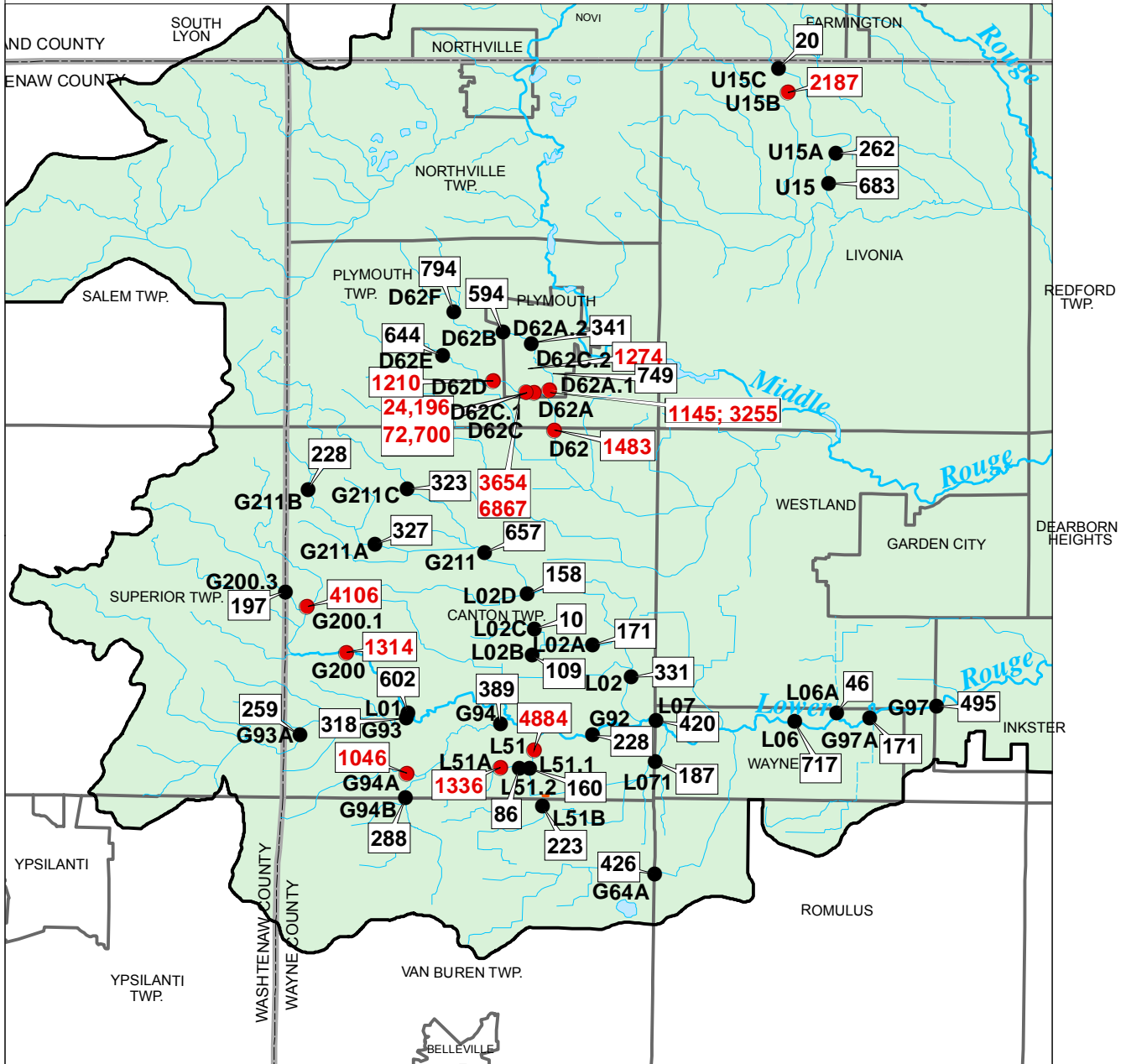
[1] Illicit discharges investigated and removed. No further investigations are warranted at this time.

Except for those waterbodies that have already been investigated, the locations in Table 2 require further investigations to determine the presence and location of any illicit discharges. Therefore, the following areas, totaling 4,645 acres (7.3 sq. miles), are recommended for illicit discharge investigations in Oakland County:

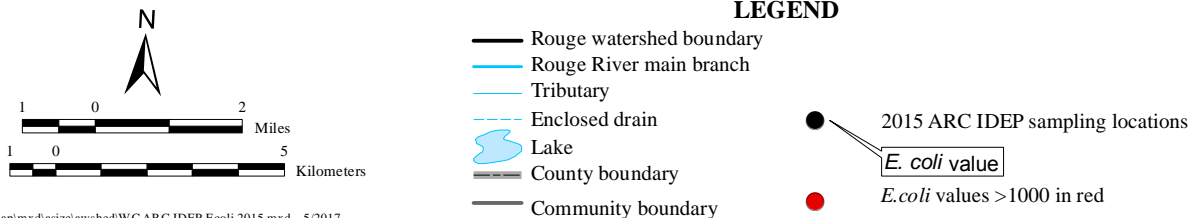
Waterbody	Community	Acres
Austin Drain	Southfield	481
Bloomfield Highlands	Bloomfield Twp	116
Claude H. Stevens No. 1 Drain	Bloomfield Twp	102
Claude H. Stevens No. 10 Drain	Bloomfield Twp	41
Claude H. Stevens No. 3 & 4 Drains	Bloomfield Twp	318
Devonshire Drain	Bloomfield Twp	207
Eight Mile Drain	Southfield	2131
Flannery	Southfield	53
Fracassi Drain	Southfield	124
Owens Relief Drain (3 Branches)	Southfield	872
US-16 Drain	Farmington	200

Appendix A. WAYNE COUNTY ARC IDEP

2015 IDEP Screening *E. coli* Results



LEGEND



Site_Id	General Description	Date	Time	Dissolved Oxygen (mg/L)	Conductivity (mS/cm)	Water Temperature (°C)	E.coli (MPN)	Total Coliforms (MPN)	Watershed	Community	Water Clarity	Water Color	Odor	Visible Debris/Pollution	Weather Conditions	Comments	notes for follow up
G00.2	Dunhill Way and Hauk Park Lower Rouge west of Ridge	09/25/15	13:45	9.37	1.938	20.5	97	11199	Lower	Canton Township	Slightly Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc		sample taken at Dunhill way and Hauk Park Riversedge sub	conductivity over 1.000
G200	Lower Rouge/Proctor/Denton	07/24/15	11:20	8.32	0.83	22.2	1314	>24196	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc	Sunny		E.coli over 1000
G200.1	Lower Rouge west of Ridge Rd (DeStaCo property)	09/17/15	12:00	6.53	1.149	16.6	4106	>24196	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	None		sample taken at the bridge at the DeStaCo property	E. coli over 1000 and conductivity over 1000 in followup sample
G200.3	3211 Napier Rd unknown tributary	09/25/15	14:05	7.95	0.826	17.5	197	17329	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc		sample taken at 3211 Napier Rd; some tires and springs in creek	
G211	Fellows Creek/Ford Rd	08/17/15	12:50	8.72	0.934	24.1	657	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		some tires at site	
G211A	Fellows Creek at Fairborn Rd Ford Rd east of Ridge Rd	08/17/15	13:05	7.71	0.814	22.7	327	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc			
G211B	Fellows Creek crossing at Poppleton Blvd east of Ridge south of Warren	08/17/15	13:30	8.22	0.795	22.3	228	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc			
G211C	Fellows Creek at Warren Rd/Beck-upstream is LR-9 bug hunt site	08/17/15	13:35	7.87	1.317	23.9	323	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc			conductivity over 1000
G64A	McClagherty Drain/Hannan Rd	08/06/15	13:00	6.53	1.78	24	426	>24196	Lower	Romulus	Moderately Turbid	Clear	None/Natural	Natural(leaves, limbs etc		floating green scum present	conductivity over 1000
G64A	McClagherty Drain/Hannan Rd	08/06/15	13:30	6.05	1.517	20.1	262	>24196	Lower	Romulus	Clear	Clear	None/Natural	Natural(leaves, limbs etc		some fixed trash present	conductivity over 1000
G92	Lower Rouge/Haggerty	07/24/15	10:45	8.47	0.936	20.1	228	17329	Lower	Canton Township	Moderately Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc	Sunny		
G93	Fowler Creek at Beck Rd	08/17/15	11:00	5.25	0.67	22.7	318	>24196	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc		riprap present upstream of bridge low flow	
G93A	Fowler Creek at Geddes Rd	08/17/15	9:30	5.98	0.824	22.5	259	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc			
G94	Sines Drain at Sheldon Rd	08/17/15	10:50	5.73	1.064	22	389	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		tire and riprap also present at site	conductivity over 1.000
G94A	Sines and Arnold Drain/Beck Rd	08/17/15	9:45	0.95	1.27	23.2	1046	17329	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		riprap on upstream side of culvert is causing flow blockage	E. coli over 1000, conductivity over 1.000, DO below 5.0mg/L
G94B	Apple Run Drain at Beck Rd	08/17/15	10:05	3.98	0.999	25.1	288	15531	Lower	Canton Township	Opaque	Gray	None/Natural	Natural(leaves, limbs etc			DO below 5.0mg/L

Site_Id	General Description	Date	Time	Dissolved Oxygen (mg/L)	Conductivity (mS/cm)	Water Temperature (°C)	E.coli (MPN)	Total Coliforms (MPN)	Watershed	Community	Water Clarity	Water Color	Odor	Visible Debris/Pollution	Weather Conditions	Comments	notes for follow up
G97	Lower Rouge/Henry Ruff Rd	07/24/15	10:05	8.08	1.056	20.8	495	>24196	Lower	Westland	Moderately Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc	Sunny		conductivity over 1.000
G97A	outfall enclosed tributary east of Venoy Rd north of Michigan Avenue	08/06/15	13:55	10	2.321	17.2	171	>24196	Lower	Westland	Highly Turbid	Brown: Light	Musty-Faint	Natural(leaves, limbs etc		some floating and fixed trash in trash rack in outfall lots of dry weather flow	conductivity over 1.000
L02	Fellows Creek/Palmer Rd	08/17/15	11:45	4.83	1.11	22.6	331	>24196	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Trash-Fixed		boards dumped at site	conductivity over 1.00 DO below 5.0mg/L
L02A	Fellows Creek/Haggerty Rd	08/17/15	12:00	5.35	0.874	24.1	171	4611	Lower	Canton Township	Clear	Clear	None/Natural	Trash-Fixed			
L02B	Fellows Creek/Morton Taylor Rd	08/17/15	12:15	1.12	0.883	20.7	109	17329	Lower	Canton Township	Slightly Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc		washing machine other trash at site sample taken at enclosed drain outlet	DO below 5.0mg/L
L02C	Fellows Creek/Cherrystone	08/17/15	12:30	4.32	0.941	27.6	10	7270	Lower	Canton Township	Highly Turbid	Brown: Light	None/Natural	None			DO below 5.0mg/L
L02CR	Fellows Creek/Cherrystone	08/17/15	12:30	4.32	0.941	27.6	10	7270	Lower	Canton Township	Highly Turbid	Brown: Light	None/Natural	None		replicate taken at L02C	DO below 5.0mg/L
L02D	Fellows Creek north of Cherry Hill	08/17/15	12:40	0.92	1.442	23	158	8121	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc			conductivity over 1.00 DO below 5.0mg/L
L06	Lower Rouge/Wayne Rd	07/24/15	10:20	8.05	1.03	20.3	717	24196	Lower	Wayne	Slightly Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc	Sunny		conductivity over 1.000
L06A	Lower Rouge tributary in Glenwood Cemetery	08/17/15	11:30	1.1	2.351	17.1	41	15531	Lower	Wayne	Clear	Clear	None/Natural	Natural(leaves, limbs etc		very low flow light film and water stagnant	conductivity over 1.00 DO below 5.0mg/L
L07	Lower Rouge/Hannan	07/24/15	10:35	8.16	0.37	19.7	420	>24196	Lower	Canton Township	Slightly Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc	Sunny		
L51	McKinstry Drain at Michigan Ave	08/17/15	10:40	3.77	1.17	22.4	4884	>24196	Lower	Canton Township	Slightly Turbid	Brown: Light	None/Natural	None			E.coli over 1,000, DO below 5.0mg/L, and conductivity over 1.000
L51	McKinstry Drain at Michigan Ave	09/17/15	11:00	4.43	1.035	15.8	122	15531	Lower	Canton Township	Highly Turbid	Brown: Medium	None/Natural	None			conductivity over 1.00 DO below 5.0mg/L
L51.1	McKinstry Drain at end of Morton Taylor	09/17/15	11:10	9.42	0.977	16	160	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		end of Morton Taylor Rd. There is some flow here. Beware of dog	
L51.2	McKinstry Drain at Washburn Rd	09/17/15	11:30	6.68	1.535	17	86	>24196	Lower	Canton Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc		sample taken at the end of Washburn Rd (past gate)	conductivity over 1.000
L51A	McKinstry Drain at Sheldon Rd	08/17/15	10:30				1336	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		extremely low water levels, temperature, DO and conductivity could not be measured	E. coli over 1000
L51B	McKinstry Drain at Van Born Rd	08/17/15	10:20	1.03	0.685	22.7	223	>24196	Lower	Van Buren Township	Opaque	Green	None/Natural	Natural(leaves, limbs etc		duckweed, algae present	
LO1	Lower Rouge/Beck	07/24/15	11:05	6.5	0.866	21.3	602	24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc	Sunny		

Site_Id	General Description	Date	Time	Dissolved Oxygen (mg/L)	Conductivity (mS/cm)	Water Temperature (°C)	E.coli (MPN)	Total Coliforms (MPN)	Watershed	Community	Water Clarity	Water Color	Odor	Visible Debris/Pollution	Weather Conditions	Comments	notes for follow up
LO71	Lower Rouge tributary at Hannan south of Michigan Ave	08/06/15	13:20	7.2	2.168	20.4	187	>24196	Lower	Canton Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		floating and fixed trash present	conductivity over 1.000
NA		09/25/15	13:50	5.14	4.083	17			Lower	Canton Township	Moderately Turbid	Brown: Light	None/Natural	Natural(leaves, limbs etc		Napier at Cherry Hill. Unmapped drain. This sample was not submitted to the lab	conductivity over 1.000
U15	Six Mile/east of Farmington	07/24/15	14:30	7.19	1.247	19.7	683	>24196	Upper	Livonia	Clear	Clear	Musty-Faint	Natural(leaves, limbs etc		sample taken on downstream side of Six Mile. Water low at site. Iron bacteria present at seeps	conductivity over 1.000
U15A	Curtis, west of Farmington, north of Six Mile	07/24/15	14:20	7.91	0.958	20.8	262	24196	Upper	Livonia	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sample taken upstream of enclosure	
U15B	north end of Bicentennial Park	07/24/15	14:00	3.46	0.754	21.2	2187	19863	Upper	Livonia	Clear	Clear	None/Natural	Natural(leaves, limbs etc			E.coli over 1000, conductivity over 1.000
U15C	Memorial Gardens/Eight Mile	07/24/15	13:50	9.33	0.796	27	20	7701	Upper	Livonia	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sample taken at base of dam in cemetery. Stream rerouted south of 8 Mile in Glen Eden memorial gardens	
D62	Tonquish Creek/Joy Rd	07/24/15	11:50	7.58	1.843	20.4	1483	>24196	Middle	Plymouth Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		some floating trash	E.coli over 1000, conductivity over 1.000
D62A	North Branch Tonquish Creek at Ford St	07/24/15	12:05	8.07	2.375	20.4	3255	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc			E.coli over 1000, conductivity over 1.000
D62A	North Branch Tonquish Creek at Ford St	09/17/15	12:30	8.49	2.119	18.2	1145	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc			E.coli over 1000, conductivity over 1.000
D62A.1	Tonquish Creek at Kellogg Street outlet	09/17/15	12:45	9.13	2.003	17.7	749	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sample taken at the south end of Kellogg St outlet	
D62A.2	Tonquish Creek at Harvey St	09/17/15	13:00	8.8	1.752	17.4	341	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sample taken at the upstream side of enclosure at Harvey/north of Ann Arbor Trail	conductivity over 1.000
D62B	Tonquish Creek/Sheldon Rd south of Penniman Rd	07/24/15	13:15	10.51	1.033	23.9	594	>24196	Middle	Plymouth Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc			conductivity over 1.000
D62B-R	Tonquish Creek/Sheldon Rd south of Penniman Rd	07/24/15	13:15				644	>24196	Middle	Plymouth Township						field replicate taken of D62B	
D62C	South Branch Tonquish at Main St	07/24/15	12:15	8.36	1.074	20.7	3654	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		some dripping from outfall right bank	E.coli over 1000, conductivity over 1.000*
D62C	South Branch Tonquish at Main St	09/17/15	13:10	8.15	1.374	18.6	6867	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		Main St at Rite Aid. Very steep banks	E.coli over 1000, conductivity over 1.000*
D62C.1	outfall north side of South Branch Tonquish Creek at Harvey St	09/17/15	13:30	7.26	1.206	19.1	>24196	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sample collected at Harvey outfall in culvert from Norh side	E. coli elevated (sewage source), conductivity over 1.000

Site_Id	General Description	Date	Time	Dissolved Oxygen (mg/L)	Conductivity (mS/cm)	Water Temperature (°C)	E.coli (MPN)	Total Coliforms (MPN)	Watershed	Community	Water Clarity	Water Color	Odor	Visible Debris/Pollution	Weather Conditions	Comments	notes for follow up
D62C.1	outfall north side of South Branch Tonquish Creek at Harvey St	09/25/15	14:35		0.982	20.7	72700	141360	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		Harvey Street outfall lots of small fish. Surfactant: >0.25ppm; Ammonia 0.5 ppm	E. coli elevated (sewage source), conductivity over 1.000
D62C.2	Crestwood Condos east of Sheldon (south branch Tonquish creek)	09/17/15	13:55	8.75	0.904	18.2	1274	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		sampled in Crestwood condos, east of Sheldon Rd. lots of small minnows in deep pools	E. coli over 1000
D62C.2R	Crestwood Condos east of Sheldon (south branch Tonquish creek)	09/17/15	13:55	8.75	0.904	18.2	1259	>24196	Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		replicate of site above	
D62D	S. branch Tonquish at Jo Ann Road west of Sheldon Rd	07/24/15	12:30	8.2	0.687	20.7	1210	19863	Middle	Plymouth Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		minnows at site	E. coli over 1000
D62E	South Branch Tonquish Creek in Plymouth Township Park	07/24/15	12:50	8.2	0.3668	21.4	644	9208	Middle	Plymouth Township	Clear	Clear	None/Natural	Natural(leaves, limbs etc		lots of little fish/minnows	
D62F	North Territorial Road west of Sheldon	07/24/15	13:05	8.04	1.856	21	794	>24196	Middle	Plymouth Township	Slightly Turbid	Clear	None/Natural	Natural(leaves, limbs etc			conductivity over 1.000
City of Plymouth IDEP Harvey Street (with ALS Lab)																	Plymouth investigation samples below
Linden/Harvey	Linden/Harvey	09/29/15	10:15				130		Middle	Plymouth City	Clear	Clear	None/Natural	None		Ammonia >2.0, Surfactant <0.25	
1046 Palmer	1046 Palmer	9/29/2015	11:20				60		Middle	Plymouth City	Clear	Clear	Musty-Faint	None		surfactant 3.0ppm; Ammonia 0.75ppm	
1096 Palmer	1096 Palmer	09/29/15	11:00				TNTC		Middle	Plymouth City	Moderately Turbid	Milky/White	Sewage-Stong	Sewage Solids-Floating		toilet paper in storm; sanitary odor, sewage fungus present' TNTC with 100 dilutions Surfactant: <0.25, Ammonia <0.25	
1097 Hartsough	1097 Hartsough	09/29/15	14:15				NA		Middle	Plymouth City	Highly Turbid	Brown: Light	Musty-Faint	None	Overcast	rain intensifying, first flush starting in manhole; looks like old sanitary; storm sewer in middle of block. Hardly any flow	
1108 Beech	1108 Beech	09/29/15	9:45				80		Middle	Plymouth City	Clear	Clear	None/Natural	None		10 dilution of sample; Ammonia 0.25, Surfactant 1.5	
1124 Carol (West)	1124 Carol (West)	09/29/15	14:35				NA		Middle	Plymouth City	Clear	Clear	None/Natural	None	Raining	raining' sample not analyzed by the lab; water clear, some first flush	
656 Harvey	656 Harvey	09/29/15	10:30				10		Middle	Plymouth City	Clear	Clear	None/Natural	Natural(leaves, limbs etc		Ammonia: 0ppm; Surfactant> 0.25	
918 Hartsough	918 Hartsough	09/29/15	14:06				NA		Middle	Plymouth City	Highly Turbid	Gray	Musty-Strong	Trash-Floating		lab sample at this loction not analyzed; cigarette butts, highly turbid water; Ammonia >2.0, Surfactant 1.0	

Site_Id	General Description	Date	Time	Dissolved Oxygen (mg/L)	Conductivity (mS/cm)	Water Temperature (°C)	E.coli (MPN)	Total Coliforms (MPN)	Watershed	Community	Water Clarity	Water Color	Odor	Visible Debris/Pollution	Weather Conditions	Comments	notes for follow up
Beech/Harvey G62C.2	Beech/Harvey G62C.2	09/29/15	9:30				TNTC		Middle	Plymouth City	Slightly Turbid	Gray	Sewage-Stong	None		sewage fungus present; strong sewage odor; TNTC with 100 dilutions; Ammonia 0.25 ppm; Surfactant 0.25ppm	
1104 Sutherland		09/29/15					NA		Middle	Plymouth City						no sample analyzed at the lab	
																	*triggered follow up investigation

Appendix B. OCWRC Dry Weather Screening and Prioritization Criteria

The following is a portion of Oakland County's Stormwater Permit Application that was submitted in 2016.

Appendix J:

Attachment 2: WRC Alternative IDEP, Sampling Points and DWS Prioritization Criteria

IDEP Sampling Points

WRC has been collecting visual observation and water quality sampling data on County Drains since 1999. Dry weather Screening and water quality sampling procedures have been developed under the Voluntary Storm Water NPDES Permit for the Rouge Watershed in 1999 and the Oakland County General Stormwater NPDES Permit issued in 2003. Procedures are included in WRC Work instruction, EU 1702, " Illicit Discharge Elimination Program". (APPENDIX E)

Sampling points have been selected as to monitor the entire length of all open and enclosed County drains for illicit discharge sources. The following are taken into consideration when selecting sampling site locations; Drainage District and Oakland County boundaries; the length of the drain including significant branch and segment connecting points; points of discharge to surface waters or connected storm drains outside WRC's jurisdiction and; locations with a high potential for illicit discharge. The potential for illicit discharge is based on historical DWS and sampling results, complaints, historical discharges, spills or other water quality concerns. IDEP sampling points have been selected over time and are continually evaluated by the IDEP Coordinator. Sampling locations, DWS and sampling location and frequency can be adapted to meet the illicit discharge Investigation and water quality data needs of WRCs IDEP Program. Sampling point locations are subjective and can include MS4 Outfall and Discharge Point locations but are not mutually inclusive or exclusive of County Drain MS4 designations or MS4 Outfall or Discharge Point Locations. WRC currently performs routine DWS and sampling on 367 open and enclosed County Drains at 879 locations. A map and list of current 2014 sampling site locations are included as attachments.

Criteria for Prioritization and Scheduling of DWS and Illicit Discharge Investigations

Drains are prioritized and a frequency for DWS and scheduling of IDEP investigations on County Drains is established by on an ongoing review of current and historical DWS screening and sampling data, complaint investigation information and other surface water quality concerns received by WRC. A frequency for ongoing Dry Weather Screening and the need for IDEP Investigations are based on physical evidence of pollutants and or concentrations of *E.coli* found in the drain. A Table listing the criteria used for establishing DWS frequency and prioritizing of Illicit Discharge Investigation of the drains appears below. A schedule for going DWS of WRC IDEP Sampling points for the proposed permit period is attached.

Table 1 MS4 Sampling Categories & DWS Frequencies (based on average E. coli sampling values)

DWS Sampling Frequency	(1)Sampling Average	CAT-A	CAT-B	CAT-C	CAT-D	Sampling Criteria
1st Sampling						
5 years	1	X				No flow, E. coli less than 300, no visible pollutants
3 years	1	X				E. coli between 300 and 1,000
6 months	1	X				E. coli between 1,000 and 10,000
(2) Monthly	1	X	X			E. coli greater than 10,000 / other significant pollutant parameters
2nd sampling						
5 years	2	X				No flow, E. coli less than 300, no visible pollutants
1 years	2	X				E. coli between 300 and 1,000
6 months	2	X				E. coli between 1,000 and 10,000
Monthly	2	X	X	X		E. coli greater than 10,000 / other significant pollutant parameters
3rd sampling						
5 years	3	X				No flow, E. coli less than 300, no visible pollutants
1 year	3	X				E. coli between 300 and 1,000
6 months	3	X	X			E. coli between 1,000 and 10,000
Monthly	3	X	X	X	X	E. coli greater than 10,000 / other significant pollutant parameters

- (1) Ongoing DWS of County Drains and scheduling for IDEP Investigation are based on a minimum of 3 consecutive sampling cycles, except in cases where a discharge of pollutants is clearly evident and an immediate response is required (see below). Where consecutive samplings for averages E.coli exceed the minimum thresholds the frequency between DWS increases. Where 3 consecutive sampling indicate an average exceeding the E.coli threshold the Drain is scheduled for IDEP investigation
- (2) The Table does not apply to IDEP Investigations, Complaint Investigations and Emergency Spill Response situations. The presence of sewage or other significant pollutants automatically places the suspect Drain / MS4 in Categories B-D. Drains placed in IDEP Investigation categories are removed from the schedule for DWS until an IDEP Investigation has been completed, and any illicit discharges sources been corrected. Drains that have completed an illicit discharge Investigation are placed on the back on the DWS list on a monthly schedule until 3 consecutive samplings indicate no visible signs of pollutants and average E.coli concentration less than 300 CFU / 100 ml. The last 3 consecutive samplings will be used to evaluate and schedule the drain for DWS going forward.

Drain Categories

- A** – Continued DWS and monitoring, as scheduled.
- B** – Scheduled Segmentation of Drain and upstream sampling to identify MS4s / DPs with suspect discharges. Sampling plan required.
- C** – Scheduled Illicit Discharge Investigations to locate and identify sources of pollutant discharge(s). Plan and approved budget required.
- D** - Ongoing Advanced IDEP investigation, source Identification, and Illicit Discharge Elimination. Plan, schedule, budget and funding source are TBD (To Be Determined).

Appendix C. 1999 - 2015 Oakland County Dry Weather Screening Results (cfu/100 mL)

Asset ID	Drain Name	Date 1	Result 1	Date 2	Result 2	Date 3	Result 3	Date 4	Result 4	Date 5	Result 5	Average E.coli	Category
8614	AMY DRAIN	6/24/2008	36,521	6/26/2009	22,349	6/27/2008	24,081	6/29/2010	141	11/19/2014	50	2681	CAT A
5175	AUSTIN DRAIN	4/19/2008	984	8/16/2012	2,008	7/29/2013	4,079					2005	CAT D
0	Bingham Farms Extension No. 1 Drain	9/26/2000	NA										CAT A
1387	BLOOMFIELD HIGHLANDS DRAIN	11/6/2007	2,121	4/1/2010	NA							2121	CAT C
6094	BLUE HERON	5/1/2008	50	8/17/2015	250							112	CAT A
13319	BORDEN DRAIN	7/30/2003	NA	4/15/2010	50							50	CAT A
5525	BORDEN DRAIN	7/30/2003	NA	5/11/2010	948							948	CAT A
0	BRENON DRAIN	5/7/2008	50									50	CAT A
0	CADDELL DRAIN	12/18/2005	NA	12/21/2007	50							50	CAT A
14048	CADDELL DRAIN	12/18/2005	NA	12/21/2007	50	3/3/2009	1570	4/1/2010	100	7/23/2015	2368	369	CAT B
6070	CASE DRAIN	5/30/2008	472	1/20/2012	265							354	CAT A
0	CHESTER DRAIN (BRANCH A)	3/12/2008	100									100	CAT A
0	CHESTER DRAIN (BRANCH B)	7/6/2006	NA										CAT A
0	CHESTER DRAIN (BRANCH C)	3/12/2008	100									100	CAT A
5686	CLARENCEVILLE DRAIN	7/29/2016	1666									1666	CAT D
5567	CLAUDE H. STEVENS NO.1 DRAIN	6/23/2008	422	7/20/2012	1,078	10/11/2013	1,680	12/1/2014	4,623			1371	CAT C
6523	CLAUDE H. STEVENS NO.10 DRAIN	6/18/2008	50	10/11/2013	61,128							1748	CAT C
9050	CLAUDE H. STEVENS NO.11 DRAIN	6/18/2008	50	10/4/2013	100							71	CAT A
5700	CLAUDE H. STEVENS NO.3 DRAIN	5/1/2008	NA	10/11/2013	7,194							7194	CAT D
6558	CLAUDE H. STEVENS NO.4 DRAIN	5/1/2008	NA	10/11/2013	10,909							10909	CAT C
6099	CLAUDE H. STEVENS NO.5 DRAIN	5/30/2008	176	10/4/2013	50							94	CAT A
6159	CLAUDE H. STEVENS NO.6 DRAIN	5/1/2008	NA	10/11/2013	155							155	CAT A
6102	COY DRAIN	5/1/2008	745	10/15/2012	375	7/22/2015	1124					680	CAT B
5011	DALY DRAIN	6/18/2008	240									240	CAT A
8555	DECONICK DRAIN	1/0/1900	NA	4/1/2010	50	8/19/2015	50					50	CAT A
5417	DEVONSHIRE DRAIN	1/19/2005	4,401	2/6/2009	4,472	6/3/2009	1,974	3/31/2010	50			1181	CAT C
4670	DONAHUE DRAIN	9/11/2015	820									820	CAT A
82835	DONAHUE DRAIN	9/11/2015	394									394	CAT A
581844	DONAHUE DRAIN	9/11/2015	50									50	CAT A
0	DOROTHY WEBB DRAIN	6/19/2002	368	4/27/2010	200	8/19/2015	224					255	CAT A
0	EARLMOOR DRAIN	6/25/2008	219									219	CAT A
3279	EDWARDS RELIEF DRAIN	12/9/2005	640	5/1/2008	540	7/15/2010	1,032	8/4/2012	50			365	CAT A
905280	EIGHT MILE DRAIN	2/18/2005	252	6/2/2008	4,237	3/26/2010	493	7/8/2016	26,922			1940	CAT C
0	EVANS DRAIN	6/3/2008	6,411	7/1/2010	253							1274	CAT B
0	EVERGREEN RD. DRAIN	5/6/2008	50									50	CAT A
232	FLANNERY DRAIN	3/18/2009	352	7/12/2016	8,855							1765	CAT C
6217	FRACASSI DRAIN	4/25/2008	3,485	6/20/2008	3,453	10/20/2008	26,437	12/20/2013	2,427	12/22/2014	35,397	14240	CAT D
16069	FRANCIS DRAIN	7/22/2009	NA	6/15/2010	NA	8/15/2012	50	7/21/2015	612			175	CAT A

Asset ID	Drain Name	Date 1	Result 1	Date 2	Result 2	Date 3	Result 3	Date 4	Result 4	Date 5	Result 5	Average E.coli	Category
0	FRANCIS DRAIN	2/14/2008	NA	7/22/2009	2070	6/15/2010	1003	8/15/2012	466	7/21/2015	100	558	CAT B
	FRANKLIN SUBWATRESHED DRAIN	9/10/2015	375									375	CAT A
	FRANKLIN SUBWATRESHED DRAIN	9/10/2015	278									278	CAT A
6360	GRAVES DRAIN	6/19/2008	NA										CAT A
0	GRONKOWSKI DRAIN	4/28/2008	50									50	CAT A
6131	HAMLIN DRAIN	7/10/2001	2,128	2/2/2005	512	6/25/2008	1,605	3/31/2010	315	7/20/2012	158	614	CAT A
9514	HAZEL DRAIN	3/26/2009	255	7/29/2016	375							309	CAT D
0	HOLLANDAR DRAIN	8/6/2010	1,415									1415	CAT A
3357	JACOBS DRAIN	4/1/2010	500	9/10/2015	823							641	CAT A
3357	JAMIAN DRAIN	4/1/2010	50	9/10/2015	1,054							230	CAT A
0	JILBERT DRAIN	5/7/2008	100									100	CAT A
593737	KEMP DRAIN	4/27/2010	187	8/19/2015	265							223	CAT A
8223	KEMP DRAIN	4/27/2010	100	8/19/2015	250							158	CAT A
7565	KOLLAR DRAIN	5/1/2008	298	8/17/2015	2,652							889	CAT B
6609	LAW DRAIN	6/30/2005	NA	7/19/2010	1,232	11/20/2012	100					351	CAT A
6610	LAW DRAIN	6/30/2005	NA	7/19/2010	NA								CAT A
6612	LAW DRAIN	6/30/2005	NA	7/19/2010	2,047							2047	CAT A
6608	LAW DRAIN	6/30/2005	NA	7/19/2010	NA	11/20/2012	1,151					1151	CAT A
6604	LAW DRAIN	6/30/2005	NA	7/19/2010	NA								CAT A
6606	LAW DRAIN	6/30/2005	NA	7/19/2010	NA								CAT A
6603	LAW DRAIN	6/30/2005	NA	7/19/2010	NA								CAT A
6611	LAW DRAIN	6/30/2005	NA	7/19/2010									CAT A
6605	LAW DRAIN	6/30/2005	NA	7/19/2010	99,854	7/29/2013	682					8252	CAT B
6607	LAW DRAIN	6/30/2005	NA	7/19/2010	99,854	7/29/2013	4,279					20671	CAT D
0	LUEDERS DRAIN	7/30/2003	NA	6/27/2008	1,153	5/11/2010	2,688					1760	CAT B
0	LUZ DRAIN	11/15/2008	100									100	CAT A
5522	LYNN D. ALLEN DRAIN	6/18/2008	2,123	3/31/2010	198	7/29/2013	644					647	CAT A
8331	MAPLEHURST DRAIN	6/1/2005	NA	7/28/2010	755							755	CAT A
5643	MCCLUNG DRAIN	6/1/2008	653	7/1/2010	919	8/2/1012	4,213	7/30/2013	100	11/19/2014	50	417	CAT A
0	MCDONNEL DRAIN	4/25/2008	224									224	CAT A
1777	MCINTOSH DRAIN	4/30/2008	50	8/17/2015	100							71	CAT A
7575	MINNOW POND DRAIN	5/2/2008	873	8/15/2012	667							763	CAT B
6344	MINNOW POND DRAIN	5/2/2008	873	8/12/2012	1196							1022	CAT B
4620	MORGAN DRAIN	7/13/2007	NA	7/12/2016	278							278	CAT A
0	MORGAN DRAIN	7/13/2007	NA										CAT A
0	MORGAN DRAIN	7/13/2007	NA										CAT A
9688	MULLEN DRAIN	4/30/2008	584	9/10/2015	50							171	CAT A
42	MURPHY DRAIN	6/23/2008	100									100	CAT A
6146	NICHOLS DRAIN	1/25/2005	215	4/21/2005	446	5/30/2008	1,263	4/1/2010	1,479	11/19/2014	50	389	CAT A
7771	NORTHWESTERN DRAIN	4/1/2008	NA										CAT A
0	NORTHWESTERN DRAIN	4/1/2008	NA										CAT A
5631	OAK KNOB DRAIN	6/1/2008	50									50	CAT A
9551	OAKLAND HILLS ORCHARDS DRAIN	8/11/2009	NA	6/17/2010	124	8/15/2012	155	7/21/2015	100			124	CAT A
1316	OWENS DRAIN (BRANCH A)	4/4/2008	NA	7/11/2016	571							571	CAT A

[illegible]

Attachment C

Outfall Screening Procedure for Identifying Potential Illicit Discharges

OUTFALL SCREENING PROCEDURE FOR IDENTIFYING POTENTIAL ILLICIT DISCHARGES

PREPARED FOR:

THE ALLIANCE OF ROUGE COMMUNITIES
46036 MICHIGAN AVE, CANTON, MICHIGAN 48188



SEPTEMBER 26, 2017

SECTION A – PURPOSE

The purpose of this procedure is to describe the protocols to inspect stormwater outfalls for the presence of illicit discharges. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

SECTION B – PERFORMING FIELD OBSERVATIONS AT OUTFALLS

Outfalls will be assessed during dry weather conditions focusing on the criteria listed below. This assessment will be conducted following at least 48 hours with no precipitation.

1. Presence/absence of flow
2. Deposits/stains on the discharge structure or bank
3. Vegetation condition
4. Structural condition
5. Biology, such as bacterial sheens, algae, and slimes
6. Water clarity
7. Color
8. Odor
9. Floatable materials

A field form (See Figure 1) that documents the condition of the outfall and any discharge will be completed. In addition to the assessment of the field screening criteria, GPS positioning will be obtained for new or previously unscreened outfalls.

SECTION C – PERFORMING FIELD SCREENING

Only individuals that have been trained to do so will perform field screening activities. Acceptable training includes the following elements: goals of the IDEP program, how to recognize illicit discharges and sampling techniques. Four months of IDEP field experience consisting of outfall screening and/or advanced investigations can be substituted for classroom training.

If the visual observations indicate a potential illicit discharge, flow is observed and the source of the flow is not immediately identifiable then sampling will be performed. Based on the suspected discharge or the pollutant of concern, some or all of the following parameters will be assessed:

1. pH will be sampled if an industrial discharge is suspected. A pH measurement will be obtained using calibrated portable field meter such as pH pen or multi-parameter probe.
2. Detergents will be sampled if flow is observed to have foam or suds or if a sanitary discharge is suspected. The sample will be field screened for surfactants using a colorimetric method such as CHEMets kit # K-9400 (www.chemetrics.com). The operating range of the test should be between 0 and 3 mg/L.
3. *E. coli* will be sampled if a sanitary discharge is suspected. These samples will be collected in a sterile 100 mL bottle, stored on ice, and transported to a laboratory for analysis. The analytical range should be between 10 and approximately 24,000 colonies/100 mL. Care should be taken not to disturb any accumulated sediment when collecting the *E. coli* sample.

4. Other parameters – Additional samples may be collected depending on the suspected source.

Disposable gloves will be worn to collect all samples. Gloves will be changed out between sampling sites. *E. coli* samples must be collected directly into the laboratory container, while sample collection cups may be used for pH and surfactants. Decontamination procedures for reusable sample collection containers consists of a triple rinsed with site water prior to taking a measurement.

E. coli samples shall be delivered to the laboratory with sufficient time for the samples to be analyzed within the method specific hold time. Confirmation of method specific hold times shall be obtained from the laboratory at the onset of sampling efforts. For *E. coli* analysis, the goal of the sampling team will be to deliver samples to the laboratory within 6 hours of collection where sample processing will occur within 2 hours for a total hold time of 8 hours. However, as these samples are intended to be used for screening purposes, a total hold time of 24 hours will be acceptable if it is not cost effective to meet the shorter hold time.

If sample result exceeds the threshold(s) provided in Table 1, then additional investigations are recommended to locate the source of the suspicious discharge.

Field screenings will be conducted in conjunction with field observation procedures as described in Section B. Screenings may also be conducted on an as needed basis if suspicious discharges are discovered by field staff during day-to-day operations, or if a pollution complaint or referral is received from the public or other agencies.

Table 1 – Guidance for Screening Results

Parameter	Follow-up Threshold
<u>Typical Parameters</u>	
pH	>9 or <6.5
Surfactants (mg/L)	>0.75
<i>E. coli</i> (cfu/100 mL or MPN/100 mL)	>5,000
Physical signs	unusual odor, color, clarity, floatables, deposits, stains, vegetation change, outfall structural damage
<u>Additional Parameters</u>	
Ammonia (mg/L)	>1
Conductivity (uS/cm)	>1,000
Turbidity (NTU)	>5
TDS (mg/L)	>500
Dissolved oxygen (mg/L)	< 5
Temperature (°F)	+5 warm water stream [1] +2 cold water stream [1]

SECTION D – PROCESS FOR REVISION

Any questions on this procedure should be directed to the entity's Stormwater Manager. This procedure shall be reviewed once per permit cycle by ARC staff for any updates.

Figure 1 – Outfall Screening Form

Outfall Inventory Form			
(Logo)			
Date: _____		Field Crew: _____	
Weather: _____		<input type="checkbox"/> 48 hrs no precip	
1) IDENTIFICATION:			
Outfall ID: _____		Size: _____	
Location: _____		Material: _____	
2) OBSERVATIONS:			
Damage (circle all that apply): None Cracking Spalling Corrosion Other			
Describe: _____			
Vegetation (circle one): None Inhibited Excessive			
Describe: _____			
Flow: _____ Known industrial or commercial uses in drainage area: Yes or No			
Other: _____			
(Circle all that apply)			
Odor: None Sewage Detergents Sulfide Oil/Gas Rancid-Sour			
Other: _____			
Color: None Clear Gray Black Green Brown Other:			
Turbidity: None Cloudy Opaque			
Floatables: None Sewage Oil Sheen Algae Other:			
Biological: None Bacterial sheen Algae Slime			
Deposits: None Sediment Other: _____			
Sample Obtained: Yes or No			
Additional Observations: _____			
3) ANALYSES:			
Temperature: _____		Equipment used: _____	
Conductivity: μ S/cm		Equipment used: _____	
pH Value: _____		pH mV: _____	
Ammonia: ppm		Equipment used: _____	
Detergents: ppm		Equipment used: _____	
Follow up: Yes or No		Reason: _____	
4) PHOTOGRAPH:		5) COMMENTS:	
Photo ID: _____			

Attachment D

Advanced Investigation Procedure for Locating the Source of Suspicious Discharges

ADVANCED INVESTIGATION PROCEDURE FOR LOCATING THE SOURCE OF SUSPICIOUS DISCHARGES

PREPARED FOR:

THE ALLIANCE OF ROUGE COMMUNITIES
46036 MICHIGAN AVE, CANTON, MICHIGAN 48188



SEPTEMBER 25, 2017

SECTION A – PURPOSE

The purpose of this procedure is to describe the protocols to conduct advanced investigations in storm sewer systems to identify the source of a suspicious discharge. These investigations would be performed based on the results of field screening procedures or based on a pollution complaint. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

SECTION B – PERFORMING SOURCE INVESTIGATIONS

Investigations will be carried out by someone who is trained as an IDEP Investigator. The minimum training requirements for an Investigator are 1) four hours of classroom instruction on how to identify and investigate sources of illicit discharges including failing septic systems, seepage from sanitary sewers, illegal dumping, and suspicious discharges from outfalls, and 2) knowledge of stormwater collection systems. Four months of IDEP advanced investigations field experience can be substituted for classroom training.

The investigation parameters will be selected based on the nature of the complaint or initial field screening results according to the parameters and threshold values indicated in the Field Screening Procedure for Identifying Potential Illicit Discharges Standard Operating Procedure. If working within a river/stream/open drain, then samples or observations will be taken at the origin of the suspicious discharge and at upstream locations. This will continue until the source is found or an enclosed storm sewer is located.

B.1 Determining Ownership

For complaint-based investigations, the owner/operator of the enclosed storm sewer will be determined. If it is suspected that a discharge originates from another jurisdiction, the other jurisdiction will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within 10 working days of the discovery of the discharge from the other jurisdiction.

For investigations based on outfall screening results, the ownership step is not required because it is assumed that outfall screening was completed by the owner/operator.

For investigations based on instream sampling results and the owner/operator is participating in the Rouge River Collaborative IDEP Plan, the owner/operator will be notified of the suspicious discharge and storm and sanitary sewer maps will be obtained. Investigations will continue with the assistance of the owner/operator. If the owner/operator is not participating in the Rouge River Collaborative IDEP Plan, then they will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within a timeframe ranging from immediately/within 24 hours (for sources posing an imminent threat) or for non-emergency issues up to 5 working days of the discovery of the discharge from the other jurisdiction.

B.2 Source Investigations

Enclosed drain investigations will proceed, following discovery of a suspicious discharge. The site of the discharge will be resampled during dry conditions for the appropriate indicator parameter. The sample parameters will be the same as those used during the initial field screening. If no flow is present, a second site visit will be conducted within 4 weeks of discovery, weather permitting. If no flow is present during

the second site, a third site visit will be conducted within 2 months of the date of the second visit, weather permitting.

Additional sampling/observations will be conducted upstream within the drainage system to narrow down the section of pipe from which the suspicious discharge is emanating. Sampling will be conducted as outlined in the Field Screening Procedure for Identifying Potential Illicit Discharges SOP.

Ideally, the sampling data or observations will allow staff to isolate a section of storm sewer to employ advanced investigation techniques. These techniques include televising the storm sewer, smoke testing, and conducting dye testing of homes, facilities, or sewers to verify a suspected illicit connection or discharge. The lead investigator will determine which of these techniques (or other technique) will be employed.

SECTION C – CLOSED CIRCUIT TELEVISION (CCTV)

CCTV inspections may be performed to determine if illicit connections are present in a storm drain. This allows for inspectors to identify suspicious taps to the drain. This work will be performed by a qualified staff or contractor. If possible, a video recording of the inspection will be performed. If possible, the lead investigator will be present during the CCTV inspection in order to direct additional efforts.

SECTION D – SMOKE TESTING

Smoke testing may be performed to determine if a residence or facility is illicitly connected to the storm drain. This work will be performed by a qualified staff or contractor. This testing requires homeowner notification to ensure all plumbing traps are filled with water and to make them aware of the potential intrusion of smoke into their homes. The local fire department should also be notified prior to testing. Non-toxic smoke is used. The drain may be plugged at various locations to ensure the testing is limited to the area of interest. Smoke found exiting a building plumbing vent indicates that the home is illicitly connected to the storm sewer. Care must be taken to perform this testing during the appropriate weather conditions in order not to mistaken steam from a heating system or fog as smoke. This testing may also identify improper connections between the storm and sanitary system.

SECTION E – DYE TESTING

Dye testing may be performed on plumbing fixtures (i.e. sinks, toilets, floor drains, etc.) within facilities/structures that are suspected of illicitly discharging non-stormwater flows into the MS4 to determine if they are properly connected to the appropriate sewer. Prior to administering a tracer dye, the lead investigator will submit a Notice of Intent to the MDEQ under General Rule 97 Certification of Approval Authorizing Tracer Dyes in Surface Waters. In addition, the following agencies shall be notified 48 hours prior to the application:

- Local Municipality
- Local Health Department
- Downstream Municipalities and Health Departments potentially affected
- Local Fire Department

Once approved, tracer dye will be applied to the appropriate plumbing fixture(s) per the manufacturer's recommendations and in a manner that will minimize potential effects to surface water. The following item will be documented when conducting a dye test:

- Facility or Building Name
- Date
- Location where dye is applied (i.e. second floor men's restroom)
- Time the dye is applied
- Time dye is observed in the field
- Location where dye is observed (i.e. sanitary manhole, northeast of building)
- Time of Travel
- Follow up action, if needed

SECTION F – PROCESS FOR REVISION

Any questions on this procedure should be directed to the entity's Stormwater Manager or ARC staff. This procedure shall be reviewed once per permit cycle by ARC staff for any updates.

Attachment E

Southeast Michigan Regional IDEP Training Plan

**Southeast Michigan Regional
Illicit Discharge Elimination Program Training Plan
February 19, 2013**

Introduction

Southeast Michigan is a seven county region with a population exceeding 4.7 million and comprising 16 watersheds. Five of the counties (Wayne, Washtenaw, St. Clair, Macomb and Oakland), comprising 11 watersheds, have a stormwater discharge permit. The permit requires training in various aspects of illicit discharge elimination. Recent audits of permittees by the Michigan Department of Environmental Quality have requested documentation of such training. This document lays out a plan for training municipal staff that is consistent with the language in the forth coming stormwater permit. The plan provides background information, objectives, details, and a cost-share arrangement to provide stormwater-related training to the permitted communities.

Background

The Alliance of Rouge Communities (ARC) has sponsored the Basic/Advanced IDEP Training for the last few years. This training was made available to ARC members without charge. The participation in the training has decreased over the years. Wayne County has provided training to non-ARC members in southeast Michigan on a cost recovery basis, e.g. contracts with Eastern Michigan University, Washtenaw County.

In 2011, SEMCOG sponsored five municipal training sessions across Southeast Michigan that targeted pollution prevention actions at municipal facilities. These ½ day sessions also included an illicit discharge identification component designed to educate a broad audience on basic recognition and reporting techniques. Staff from Washtenaw, Livingston, St. Clair, Oakland, Macomb and Wayne counties helped to develop the content of the training and co-host the session at one of their facilities. The sessions were also co-hosted by the DEQ, which provided Industrial Operator Training at no cost in the afternoon of each session. Over 350 people attended the five training sessions and 107 people took the DEQ Industrial Operator.

Objective

The goal of this plan is to provide training to the southeast Michigan region focused on illicit discharge elimination and storm water pollution prevention. There are three main objectives of this plan. The first objective is to establish a framework that shares responsibility and costs of training on a regional basis. The second objective is to be efficient by maximizing class size not duplicating efforts and spreading the costs over the region. The third objective is to make it unnecessary to charge a fee for the training.

Plan

The plan calls for an alternating five year schedule of training between Wayne County's IDEP training program and SEMCOG's municipal facility training and illicit discharge recognition training provided by the host county. The training would be provided once a year. The period covered by this plan is January 2013 through December 2017.

Every other year beginning with 2013, Wayne County's IDEP Training will be provided to the region. Table 1 lists the responsibilities and schedule for each IDEP training session. In 2014 and 2016, SEMCOG's municipal facility training with illicit discharge recognition training will be provided. Table 2 lists the responsibilities for the SEMCOG municipal facility and illicit discharge recognition training.

Note: This schedule is consistent with the language concerning training in the new State stormwater permit.

Cost Sharing

The goal is to distribute cost among the region by rotating sites for the training, so that the trainings can be offered at no charge. This would reduce the cost to the ARC since the IDEP training registration would be handled by others and since it would be offered every other year. This will also reduce the cost to other permittees, since the IDEP training charge would be offered at no charge (a savings of around \$75 per attendee).

Table 1: Traditional IDEP Training Schedule and Responsibilities

Year	Staff Cost ¹	Facility/Refreshments ²	Registration ³	Print and Mail Certificates
2013	ADW, ARC	Wayne County	Wayne County	Wayne County
2015	ADW, ARC	Washtenaw County	Washtenaw County	Wayne County
2017	ADW, ARC	Macomb County	Macomb County	Wayne County

- 1- Will provide trainers for the event at no charge to the municipalities or other counties.
- 2- Will arrange for a training location and provide refreshments/snack
- 3- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

Table 2: SEMCOG Municipal Facility and Illicit Discharge Training Schedule and Responsibilities

Year	Staff Cost	Facility/Refreshments ³	Registration ⁴
2014	Host County ¹ , SEMCOG ²	St. Clair County	SEMCOG
2016	Host County ¹ , SEMCOG ²	Oakland County	SEMCOG

- 1- Will provide or arrange for trainers for the event in collaboration with SEMCOG.
- 2- SEMCOG donated time
- 3- Will arrange for a training location and provide refreshments/snack
- 4- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

W. MISTERDVIK

Signature

W. MISTERDVIK
CHIEF DEPUTY MACOMB
COUNTY PUBLIC WORKS

Name/Title COMMISSIONER

05-17-2013

Date

Oakland County Representative

Signature

Name/Title

Date

St. Clair County Representative

Signature

Name/Title

Date

Washtenaw County Representative

Signature

Name/Title

Date

Wayne County Representative

Signature

Name/Title

Date

SEMCOG Representative

Signature

Name/Title

Date

Alliance of Rouge Communities Representative

Signature

Name/Title

Date

Alliance of Downriver Watersheds Representative

Signature

Name/Title

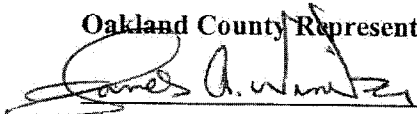
Date

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

Signature Name/Title Date

Oakland County Representative

 _____
Signature Name/Title Date
JAMES WINKKA / ASST. CHIEF ENG. 4/17/13

St. Clair County Representative

Signature Name/Title Date

Washtenaw County Representative

Signature Name/Title Date

Wayne County Representative

Signature Name/Title Date

SEMCOG Representative

Signature Name/Title Date

Alliance of Rouge Communities Representative

Signature Name/Title Date

Alliance of Downriver Watersheds Representative

Signature Name/Title Date

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

_____ Signature	_____ Name/Title	_____ Date
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Oakland County Representative

_____ Signature	_____ Name/Title	_____ Date
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Saint Clair County Representative

<u><i>Steve Smith</i></u> Signature	<u><i>Executive Director</i></u> Name/Title <i>DIRECTOR</i>	<u><i>4-29-13</i></u> Date
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Washtenaw County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Wayne County Representative

_____ Signature	_____ Name/Title	_____ Date
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SEMCOG Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Rouge Communities Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Downriver Watersheds Representative

_____ Signature	_____ Name/Title	_____ Date
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Macomb County Representative

_____ Signature	_____ Name/Title	_____ Date
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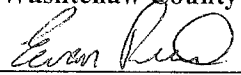
Oakland County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

St. Clair County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Washtenaw County Representative

 Signature	<u>Evan Pratt</u> <u>Water Resources Commissioner</u> Name/Title	<u>8/8/12</u> Date
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Wayne County Representative

_____ Signature	_____ Name/Title	_____ Date
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SEMCOG Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Rouge Communities Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Downriver Watersheds Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

_____ Signature	_____ Name/Title	_____ Date
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Oakland County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Saint Clair County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Washtenaw County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Wayne County Representative

<u>Kelly A Cave</u> Signature	<u>KELLY A CAVE</u> <u>WAYNE CO SYSTEM WATER</u> Name/Title <u>COORDINATOR</u>	<u>11 APRIL 13</u> Date
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SEMCOG Representative

_____ Signature	_____ Name/Title	_____ Date
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Alliance of Rouge Communities Representative

<u>Kevin L. Buford</u> Signature	<u>Kevin Buford, ARC Chair</u> Name/Title	<u>3/28/13</u> Date
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Alliance of Downriver Watersheds Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

_____ Signature	_____ Name/Title	_____ Date
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Oakland County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

St. Clair County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Washtenaw County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Wayne County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------


SEMCOG Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Rouge Communities Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Downriver Watersheds Representative

 Signature	Mark Gahry, Chairman Name/Title	May 7, 2013 Date
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By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Oakland County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

St. Clair County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Washtenaw County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Wayne County Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

SEMCOG Representative

<u>Kathleen Lomako</u>	<u>Kathleen Lomako</u>	<u>8/14/2013</u>
Signature	Name/Title	Date

Alliance of Rouge Communities Representative

_____ Signature	_____ Name/Title	_____ Date
--------------------	---------------------	---------------

Alliance of Downriver Watersheds Representative

_____ Signature	_____ Name/Title	_____ Date
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Attachment F
Pollution Complaint Tracking Form
and
Suspicious Observation Documentation

Community Name

Pollution Complaint Tracking Form

Illicit Discharge Elimination Program

Complaint made by: _____

Phone #: _____

Date: _____ Time: _____

Location of Problem: _____ Offending Party (if known) _____

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

Is this an Emergency? ☐ No

☐ Yes (then call 911)

Nature of Emergency: _____

Initial Contact made to:

- ☐ 911
☐ City Dept. _____
☐ Wayne County (888) 223-2363
☐ Oakland County (248) 858-0931
☐ PEAS Hotline (State) 1-800-292-4706
☐ Other _____

Additional Comments:

Investigation Summary

- ☐ Initial Investigation
☐ Follow-up Investigation

Date of Investigation: _____

Investigating Agency: _____

Location of Discharge: _____

Crew Members: _____

Investigation Location: _____

Observations (odor, color, volume, etc.): _____

Actions Taken (dye testing, notification letter, etc.): _____

Were photos taken: ☐ Yes ☐ No

Agency Referred to: _____

Agency Contact: _____

Method of Communication:

☐ E-mail* ☐ Letter/memo* ☐ Phone

*Attached copies

Content of Communication: _____

Date Corrected or Resolved: _____

Pollution Complaint Tracking Form

Illicit Discharge Elimination Program

Recommended Procedure

1. Take down complaint information.
2. Inform the caller that the problem will be further investigated and thank him/her for calling in.
3. If the problem is related to oil or fuel, please phone 911.
4. If the Problem is related to a construction site and there is sediment leaving that site, call Oakland County or Wayne County or the local soil erosion control enforcement agency.
5. All other types of complaints should be referred to the local public works department staff or their designee for investigation.
6. Please file completed form.
7. Every 2 years, provide the ARC with the number of complaints investigated, the type (sewage, oil, etc.) of illicit discharge found, if any, and the location (closest cross streets) of the discharge.

Attachment G

State and Federal Regulatory Mechanisms

Source: MDEQ, 2014

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
SARA Title III Section 304 40 CFR 355.40 (EHS & Hazardous Substances)	<p>Release of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or Extremely Hazardous Substance (EHS) (40 CFR 355, Appendix A) from a facility (all buildings, equipment, etc. located on a single site or adjacent sites owned or operated by the same person) at which a hazardous chemical (as defined under 29 CFR 1910.1200(c)) is used, produced or stored (including motor vehicles, rolling stock, and aircraft) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hr period that migrates beyond the facility boundaries.</p> <p>Includes continuous release reportable under CERCLA Section 103.</p> <p>Excludes release that is federally permitted or that results in exposure to persons solely within the boundaries of the facility. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions.</p> <p>Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.</p> <p>Excludes release < 1000 lbs of NOx released to the air from combustion or combustion-related activities.</p>	<p>Immediate (within 15 minutes after discovery): to LEPC(s) of any area(s) potentially affected, and SERC (DEQ PEAS line accepts notification on behalf of SERC) by owner or operator.</p> <p>Continuous releases must be identified as such and are reported initially and when there is a significant change in the release.</p> <p>See 73 FR 76948 (12/18/08): Only CAFOs are required to report continuous releases to the air from animal waste.</p> <p>Transportation related releases can be reported to 911.</p>	<p>As soon as practicable (within 30 days) after release: to LEPC(s) and SERC.</p> <p>Not required for releases that occur during transportation or from storage incident to transportation.</p> <p>For continuous releases: Initial written within 30 days after initial telephone notification: to LEPC(s) and SERC.</p> <p>Michigan SARA Title III Program accepts reports on behalf of the SERC.</p>	<p>PEAS: 800-292-4706</p> <p>Contact your LEPC for a phone number to report releases.</p> <p>Call 911 if your LEPC is not active.</p> <p>For further information & LEPC contact information, contact Michigan SARA Title III Program 517-284-7272</p>
CERCLA Section 103 40 CFR 302 (Hazardous Substances)	<p>Release into the environment of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or hazardous constituent in a mixture or solution (including hazardous waste streams) from a vessel or facility (any building, structure, etc. including motor vehicles, rolling stock, aircraft, pipe, pipeline, well, pond, lagoon, impoundment, ditch, landfill, or site where a hazardous substance has come to be located) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hour period.</p> <p>Excludes petroleum, including oil, or any fraction thereof.</p> <p>See 40 CFR 302.6 for notification requirements for radionuclide releases.</p> <p>Includes continuous release: occurs without interruption or abatement or that is routine, anticipated, and intermittent and incidental to normal operations or treatment processes.</p> <p>See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. See 71 FR 58525 (10/4/06) re Exemption for NOx releases to the air of < 1000 lbs from combustion or combustion-related activities.</p> <p>Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.</p>	<p>Immediate (within 15 minutes after discovery): to NRC by person in charge of vessel or offshore or onshore facility.</p> <p>Continuous releases must be identified as such and are reported initially and when there is a significant change in the release.</p> <p>See 73 FR 76948 (12/18/08) re Exemption from reporting continuous releases to the air from animal waste.</p>	<p>For continuous releases only: Initial written within 30 days after initial telephone notification & Follow-up within 30 days of first anniversary of initial written notification: to EPA Region 5.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact Michigan SARA Title III Program 517-284-7272 or EPA's Superfund, TRI, EPCRA, RMP, and Oil Information Center 800-424-9346</p>

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 201, Environmental Remediation	<p>(i) Unpermitted release into the environment over a 24-hour period of a hazardous substance (<i>July 1, 2012, edition</i> of the CERCLA list, 40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity.</p> <p>Does not include release solely from UST systems regulated under Part 213, and release solely from disposal area licensed under Part 115 and discovered through disposal area's hydrogeological monitoring plan.</p> <p>Release of substance regulated by MI Dept of Agriculture & Rural Development (MDARD) (fertilizer, soil conditioner, or pesticide) excluding normal agricultural practices: <i>also</i> report to MDARD.</p>	<p>Within 24 hours after discovery: to DEQ-RRD district office (PEAS after hours) by owner or operator or person holding easement interest.</p> <p>Report agricultural release to MDARD.</p>	<p>Upon request: Provide a response activity plan to DEQ-RRD district supervisor.</p>	<p>PEAS: 800-292-4706</p> <p>MDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>For further information contact DEQ-RRD</p>
NREPA 1994 PA 451 Part 201, Environmental Remediation (Continued)	<p>(ii) The owner or operator has reason to believe that one or more hazardous substances are migrating or have migrated from his or her property and are present beyond the property boundary at a concentration in excess of cleanup criteria for unrestricted residential use.</p> <p>(iii) The release is a result of an activity that is subject to permitting under NREPA Part 615 and the owner or operator is not the owner of the surface property and the release results in hazardous substance concentrations in excess of cleanup criteria for unrestricted residential use.</p> <p>Hazardous substance means a hazardous substance defined in CERCLA (40 CFR 302), hazardous waste as defined in NREPA part 111, petroleum as defined in NREPA part 213, or any substance demonstrated to pose an unacceptable risk to public health, safety, welfare, or the environment.</p> <p>Cleanup criteria for unrestricted residential use means criteria that satisfy the requirements in section 20120a(1)(a) or (16); or as defined under NREPA part 213.</p>	<p>Within 30 days after discovery: to DEQ-RRD district office and owners of property to which hazardous substances migrated or owner of surface property by owner or operator of property where release occurred.</p> <p>Specific form required for: "Notice of Migration of Contamination" (Form EQP4482).</p>	<p>Upon request: Provide a response activity plan to DEQ-RRD district supervisor.</p>	<p>For further information contact DEQ-RRD</p>
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (Agricultural)	<p>Release to the environment of a commercial pesticide >5 gallons or 100 pounds.</p> <p>Reportable agricultural spills as defined in the provisions of SARA Title III section 304 and CERCLA section 103 shall be immediately reported to PEAS and the NRC.</p> <p>The term "release" excludes normal agricultural practices.</p>	<p>Immediate: to PEAS*</p> <p>Also notify NRC for spills reportable under SARA Title III & CERCLA.</p> <p>*MDARD prefers direct notification to their hotline. PEAS forwards all agriculture calls to MDARD.</p>	<p>Within 90 days: to MDARD Pesticide and Plant Pest Management Div. a revised site plan.</p>	<p>MDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>PEAS: 800-292-4706</p> <p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact MDARD 517-284-5644</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 85, Fertilizers Regulation 641 Commercial Fertilizer Bulk Storage Regulation 642, On Farm Fertilizer Bulk Storage (Agricultural)	Release to the environment of a commercial fertilizer >55 gallons liquid or 650 pounds dry, or tank overfills; or an on farm fertilizer > 55 gallons liquid. For storage tank with bladder system instead of diking: also report all overfills and internal spills. The term "release" excludes normal agricultural practices. The term "liquid fertilizer" excludes anhydrous ammonia.	Immediate: to MDARD by commercial bulk storage facility personnel (For farms, the regulation does not specify who makes the report.)	Not required.	MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 For further information contact MDARD 517-284-5644
Fire Prevention Code 1941 PA 207 Section 29.5g	A fire, explosion, spill, leak, accident, or related occurrence that involves the transportation, storage, handling, sale, use, or processing of hazardous material by a firm, person, or vehicle. Hazardous material = explosives, pyrotechnics, flammable gas, flammable compressed gas, flammable liquid, nonflammable compressed gas, combustible liquid, oxidizing material, poisonous gas or liquid, LPG, or irritating, etiologic, radioactive, or corrosive material. Act 207 amended 6/19/2006. The State Fire Marshall is in LARA, Bureau of Fire Services.	Immediately following incident, report known details regarding incident: to LARA Bureau of Fire Services <i>and</i> organized local fire department by owner of firm or vehicle or the person <i>and</i> the chief of first police or organized fire dept upon scene of incident.	Not required.	Contact LARA Bureau of Fire Services by calling the MSP HazMat hotline: 800-525-5555 For further information: contact local fire department
Fire Prevention Code 1941 PA 207 Part 2 of Storage and Handling of Flammable and Combustible Liquids rules (FL/CL code)	A release from an AST system of > 55 gal of any flammable or combustible liquid (flash point < 200°F) to the ground or within a secondary containment area during any 24 hour period. Note: Many liquid pesticides are combustible (flash point between 100 and 200°F).	As soon as practicable after detection of release: to PEAS by owner or operator.	Within 10 days after release: to LARA Bureau of Fire Services, Storage Tank Division outlining cause, discovery, response to prevent recurrence.	PEAS: 800-292-4706 For further information: contact LARA Bureau of Fire Services, Storage Tank Division 517-335-7211

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 171 (Transportation of Hazardous Materials)	<p>Initial verbal notice: Incident during transportation (including loading, unloading, temporary storage) involving (1) hazardous material and resulting in death, injury requiring hospitalization, public evacuation \geq 1 hour, major transportation artery or facility closure \geq 1 hour, or flight pattern alteration; (2) fire, breakage, spillage, or suspected radioactive contamination occurs involving a radioactive material; (3) fire, breakage, spillage or suspected contamination involving an infectious substance other than a regulated medical waste; (4) marine pollutant release exceeding 450 L (119 gal) liquid or 400 kg (882 lbs) solid; (5) other per judgment of person in possession of the hazardous material (e.g., continuing danger to life exists at scene of incident); (6) during transportation by aircraft, a fire, violent rupture, explosion or dangerous evolution of heat occurs as a direct result of a battery or battery-powered device.</p> <p>Hazardous material = CERCLA hazardous substance (40 CFR 302, Table 302.4), hazardous waste (40 CFR 262), marine pollutant (49 CFR 172.101 Appendix B), elevated temperature material, listed on Hazardous Materials Table (49 CFR 172.101), or meets criteria for hazard class/division in 49 CFR 173.</p> <p>Written follow-up report: Required for all of above, plus any unintentional release of hazardous material from a package (including tank); or any quantity of hazardous waste discharged during transportation; or structural damage to lading retention system, even if no release, on specification cargo tank with \geq 1000 gal capacity containing hazardous material; or undeclared hazardous material discovered.</p>	<p>As soon as practical but no later than 12 hours after occurrence of the incident: to NRC by each person in physical possession of the hazardous material.</p> <p>(A reportable incident <i>must</i> be reported by telephone, not online.)</p> <p>For infectious substances, notice may be given to the Director, Centers for Disease Control and Prevention, U.S. Public Health Service instead of NRC.</p>	<p>Within 30 days after discovery: to US DOT on DOT Form F 5800.1 (01-2004) "Hazardous Materials Incident Report."</p> <p>Report online at https://hazmatonline.phmsa.dot.gov/incident/</p> <p>Report must be updated w/i 1 year of incident if: Death results from injury; hazardous material or package info on prior report misidentified; damage, loss or cost not known on prior report becomes known or changes by \$25,000 or 10%.</p> <p>See regulation for exceptions to written report.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>U.S. Public Health Service 800-232-0124</p> <p>For further information contact US DOT Hazardous Materials Information Center at 800-467-4922 or online at www.phmsa.dot.gov/hazmat</p>
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to surface of ground, surface water, groundwater or public sewer system)	<p>Unpermitted release directly or indirectly to public sewer system, surface of ground, surface water or groundwater from an oil storage facility or on-land facility of a "polluting material" (oil, salt, or any material specified in table 1 in R 324.2009) in excess of its threshold reporting quantity during any 24-hour period.</p> <p>See Part 5 rules, effective 8/31/01, for details and exemptions. HB 5586 effective 6/15/04 amended the reporting requirements.</p> <p><i>Rule revisions pending as of April 2014.</i></p>	<p>As soon as practicable after detection: to PEAS <i>and</i> 911 by owner, operator or manager.</p> <p>State agencies call 911 if release reported to them by another state or Canada.</p>	<p>Within 10 days after release: to DEQ-WRD district supervisor <i>and</i> to the local health department where the release occurred, outlining cause, discovery, response & prevention of recurrence.</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-WRD</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
CWA Section 311 33 CFR 153 (Navigable waters – Coast Guard/DOT) Control of Pollution by Oil and Hazardous Substances, Discharge Removal	Discharge of a harmful quantity of oil or a hazardous substance from a vessel or onshore or offshore facility into or upon navigable waters of the United States or adjoining shorelines . Harmful quantity = oil discharge that violates applicable water quality standards, or causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or a CERCLA hazardous substance (40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility. If direct reporting to NRC not practicable, may report to district Coast Guard or EPA predesignated OSC.	Not required.	NRC 800-424-8802 or online at www.nrc.uscg.mil District 9 Coast Guard 216-902-6117 EPA Region 5 for predesignated OSC 312-353-2318 For further information contact EPA Region 5 at 312-353-8200 or District 9 Coast Guard at 216-902-6045
CWA Section 311 40 CFR 110 (Discharge of Oil)	Discharges of oil that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines , or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.	Immediate: to NRC by person in charge of vessel or facility.	Not required.	NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact DEQ-WRD
NREPA 1994 PA 451 Part 31, Water Resources Protection (Sewer Systems)	Discharge of untreated sewage or partially treated sewage from a sewer system onto land or into the waters of the state. "Sewer system" means a sewer system designed and used to convey sanitary sewage or storm water, or both.	Immediate (within 24 hours): to DEQ-ODWMA district office (PEAS after hours); Local health depts.; Daily newspaper circulated in source & affected counties; & Affected municipalities.	At end of discharge: to same parties notified initially on Form EQP 5857 (Rev. 12/2011) "Report of Discharges of Untreated or Partially Treated Sewage." Includes results of E. coli testing.	PEAS: 800-292-4706 For further information contact DEQ-ODWMA
NREPA 1994 PA 451 Part 41, Sewerage Systems	Discharges of pollutants from sewerage systems (which can include combined sewers) in excess of those authorized by a discharge permit issued by the DEQ to surface water or groundwater as a result of a facility breakdown or emergency. Sewerage systems handle sanitary sewage or other industrial liquid wastes.	Promptly: to DEQ-ODWMA district office (PEAS after hours) by owner.	Within 72 hours: to DEQ-ODWMA district supervisor, outlining cause, discovery, corrective actions taken to minimize impact, restore operations, and eliminate future unpermitted discharges.	PEAS: 800-292-4706 For further information contact DEQ-ODWMA

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 211, Underground Storage Tanks Part 213, Leaking Underground Storage Tanks	Releases of a regulated substance of any amount from underground storage tank (UST) systems (includes the emergency shutoff valve on down) subject to registration; overfill from UST fillpipe or vent onto ground; release from aboveground pipe attached to UST system. Regulated substance = petroleum or CERCLA hazardous substance (40 CFR 302, Table 302.4) or substance listed in CAA title 1 part A sect 112. Petroleum includes, but is not limited to, crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents.	(Part 211) Within 24 hours after discovery: to LARA Bureau of Fire Services, Storage Tank Division by email, or fax on Form EQP 3826 (Rev. 4/12) If free product, Form EQP 3800 (Rev 02/2003) required by UST owner or operator, or employee of owner or operator. Includes releases discovered years after UST system removed	(Part 213) At 180 days Initial Assessment Report on Form EQP3841 (Rev. 02/2003) if not closed; at 365 days Final Assessment Report on Form EQP3842 (Rev. 11/2006) if still not closed; at closure Closure Report on Form EQP3843 (Rev. 02/2003) to DEQ-RRD district project manager.	Email: deq-std-tanks@michigan.gov Fax: 517-335-2245 For further information contact DEQ-RRD or phone 800-MICHUST
NREPA 1994 PA 451 Part 111, Hazardous Waste Management (Generators; Treatment, Storage & Disposal Facilities (TSDF); Transporters)	Any amount of characteristic hazardous waste or listed hazardous waste (as defined in R 299.9203 "Hazardous Waste Rule 203") reaches the surface water or groundwater, or A fire, explosion, or other release of hazardous waste or hazardous waste constituent occurs that could threaten human health or the environment. or A release of >1lb (or ≤1lb if not immediately cleaned up) hazardous waste to the environment from a tank system or associated secondary containment system. Additional hazardous waste reporting requirements under NREPA Part 201 and CERCLA. NREPA Part 111 requires transporters to comply with 49 CFR 171 and 33 CFR 153.	Immediate: to PEAS (or for Tank systems/secondary containment, within 24 hours of discovery: to DEQ-OWMRP) and to NRC if threat to human health or environment outside facility by generator, or owner or operator of TSDF, or transporter.	For large quantity generators and TSDF: Within 15 days after incident IF the contingency plan had to be implemented: to DEQ-OWMRP. For tank/secondary containment systems: Within 30 days of discovery: to DEQ-OWMRP. For transporters: to US DOT if required per 49 CFR 171.	PEAS: 800-292-4706 NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 121, Liquid Industrial Waste	The liquid industrial waste spill could threaten public health, safety, welfare, or the environment, or has reached surface water or groundwater. Liquid industrial waste includes nonhazardous brine, by-product, industrial wastewater, leachate, off-spec commercial chemical product, sludge, sanitary or storm sewer clean-out residue, grease trap clean-out residue, spill residue, used oil, or other liquid waste not regulated by other laws.	Immediate: to PEAS and local authorities by generator, transporter, or owner or operator of facility. Refer to MCL 324.12111(1) for required report elements	Prepare within 30 days after incident. Submit upon request: to DEQ-OWMRP district supervisor. Refer to MCL 324.12111(1) for required report elements	PEAS: 800-292-4706 For further information contact DEQ-OWMRP
NREPA 1994 PA 451 Part 55, Air Pollution Control	Abnormal condition, start-up, shutdown, or malfunction that results in emissions exceeding permissible (in rule, permit or order) levels of hazardous air pollutants (HAPs) (CAA Sect. 112(b)) or toxic air contaminants (as specified in permit) for > 1 hour, or any air contaminant for > 2 hours. Written follow-up report only required for emission exceedences lasting > 2 hours.	As soon as possible, but not later than 2 business days after discovery: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 10 days after start-up, shutdown, or abnormal condition, malfunction corrected. Or within 30 days of abnormal condition, malfunction discovery- whichever first: to DEQ-AQD district supervisor.	PEAS: 800-292-4706 For further information contact DEQ-AQD

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 55, Air Pollution Control (Permit to Install Exemptions)	Emergency venting of natural gas from transmission and distributions systems or field gas from gathering lines in amounts > 1,000,000 standard cubic feet per event. Emergency = unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property or the environment if not controlled immediately. See R 336.1285(mm), effective 6/20/2008, for details.	Within 24 hours of the event: to PEAS by owner or operator.	Not required.	PEAS: 800-292-4706 For further information contact DEQ-AQD
Public Health Code 1978 PA 368 Part 133, Dry Cleaning	Condition or incident presents a threat or hazard to public health or safety.	Immediate: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 30 days after incident: To DEQ-AQD district supervisor.	PEAS: 800-292-4706 For further information contact DEQ-AQD
NREPA 1994 PA 451 Part 615, Supervisor of Wells (oil and gas production fields)	A loss, spill or release of (1) any amount of brine, crude oil, or oil or gas field waste <i>unless</i> it is less than 42 gallons and occurs while an authorized representative is on site and is completely contained and cleaned up within 1 hour, or (2) any unpermitted amount of natural gas , or (3) chemicals used in association with oil and gas activities.	Within 8 hours after discovery of: 42 gallons or more of brine, crude oil, or oil or gas field waste, or any amount of chemical or natural gas, or; less than 42 gallons if the spill contacts surface water, groundwater, or other environmentally sensitive resources, or is not completely contained and cleaned up within 48 hours: to DEQ-OOGM district office (PEAS after hours) by permittee.	Within 10 days after discovery of loss or spill: to DEQ-OOGM district supervisor on Form EQP-7233 (Rev 1/2012) "Report of Loss or Spill." by permittee Written report only for less than 42 gallons of brine, crude oil, or oil and gas field waste if spill does not contact surface water, groundwater, or other environmentally sensitive resources, and is completely contained and cleaned up within 48 hours.	PEAS: 800-292-4706 For further information contact DEQ-OOGM
49 CFR 191 Transportation of Natural and Other Gas by Pipeline	An incident, meaning: (1) Event that involves a release of gas from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility that results in: Death or hospitalization; or Property damage ≥ \$50,000; or estimated gas loss of ≥ three million cubic feet. (2) Event that results in emergency shutdown of LNG facility. (3) Significant event per operator. Written Incident reports not required for LNG facilities. Applies to pipeline systems and the transportation of gas through those systems in or affecting interstate or foreign commerce. (See 49 CFR 191.3 for details.)	Earliest practicable moment following discovery: to NRC by operator. Notification must be electronic unless there is a safety-related condition to report.	As soon as practicable, and within 30 days after discovery: to US DOT. on DOT Form PHMSA F 7100.1 "Incident Report – Gas Distribution System." or PHMSA F 7100.2 "Incident Report – Gas Transmission and Gathering Systems" or PHMSA F 7100.3 "Incident Report – Liquefied Natural Gas (LNG) Facilities" Supplemental report filed as necessary as soon as practicable.	NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.**

Additional reporting requirements might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 195 Transportation of Hazardous Liquids by Pipeline	Release of hazardous liquid (petroleum, petroleum products, or anhydrous ammonia) or carbon dioxide from a pipeline system that results in any of the following: (a) Explosion or fire; (b) Release of ≥ 5 gallons (except if < 5 barrels released due to maintenance and release not otherwise reportable, confined to property, does not pollute water, and cleaned up promptly); (c) Death of any person; (d) Injury requiring hospitalization; or (e) Property damage $> \$50,000$. (See 49 CFR 195.50, revised 1/8/02, for details) Applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate or foreign commerce. (See 49 CFR 195.1 for details.)	Earliest practicable moment following discovery: to NRC by operator if Release caused: Death or hospitalization; Fire or explosion; Property damage; Water pollution; or was Significant per the operator.	As soon as practicable, and within 30 days after discovery: to US DOT on DOT Form PHMSA F 7000-1 "Accident Report – Hazardous Liquid Pipeline Systems" Supplemental report must be filed within 30 days after operator receives changes or additions to original report.	NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov
1978 PA 368 Part 135, Radiation Control	For any emergency. Or for incident involving naturally occurring or accelerator produced radioactive material - Immediate notice if: Incident may have caused or threatens to cause: dose to body 25 rems, to skin 150 rems, to extremities 375 rems (per rule 247); 24 hour concentration exceeds 5000 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 week, or property damage $> \$100,000$. Notice within 24 hours if: Incident may have caused or threatens to cause: dose to body 5 rems, to skin 30 rems, to extremities 75 rems (per rule 247); 24 hour concentration exceeds 500 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 day, or property damage $> \$1000$.	Immediate or within 24 hours (see reporting criteria): to DEQ-OWMRP Radiological Protection Section (PEAS after hours) or MSP Operations Division for all Power Plant related incidents (day or night). by licensee or registrant.	Within 30 days after release: to DEQ-OWMRP Radiological Protection Section by licensee or registrant. Written report also required if level of radiation or concentration of radioactive material in unrestricted area > 10 times any applicable limit. See Rule 250 (R 325.5250) for required report content.	DEQ-OWMRP Radiological Protection Section 517-284-5185 MSP Operations Div 517-241-8000 PEAS: 800-292-4706 For further information contact DEQ-OWMRP Radiological Protection Section
10 CFR 20 (Standards for Protection Against Radiation)	For incident involving source, by-product, or special nuclear radioactive material - Immediate notice if: Event that may have caused or threatens to cause: effective dose equivalent to individual 25 rems, lens dose equivalent 75 rems, shallow-dose equivalent to skin or extremities 250 rads; individual could receive 5 times annual limit on intake in 24 hours. OR Any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas. Notice within 24 hours if: Event that may have caused or threatens to cause: an individual in 24 hours to receive effective dose equivalent > 5 rems, lens dose equivalent > 15 rems, shallow-dose equivalent to skin or extremities > 50 rems; individual could receive > 1 times annual limit on intake in 24 hours.	Immediate or within 24 hours (see reporting criteria): to USNRC by USNRC Licensee responsible for the incident.	Within 30 days of incident: to USNRC by licensee. Report content specified in 10 CFR 20.2003 Written report also required for occurrences as specified in 10 CFR 20 Section 20.2203 and after the occurrence of any lost, stolen, or missing licensed material becomes known to the licensee, and if at the time the report is filed all licensed material in a quantity greater than 10 times the quantity specified in appendix C to part 20 is still missing.	US Nuclear Regulatory Commission (USNRC) 301-816-5100 For further information contact DEQ-OWMRP Radiological Protection Section 517-284-5185
MIOSHA 1974 PA 154 Section 61, Records & Reports; Notice of Fatalities or Hospitalization	Any release that results in one death or the hospitalization of 3 or more persons.	Within 8 hours: to MIOSHA Hotline.	Not required.	MIOSHA Fatality or Catastrophe Hotline 800-858-0397 For further information contact LARA-MIOSHA 517-322-1831

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
TSCA 40 CFR 761.125 (PCBs)	Spills of PCBs at concentrations of 50 ppm or more and subject to decontamination requirements under TSCA that: contaminate surface water, sewers, drinking water supplies, grazing lands or vegetable gardens, or exceed 10 pounds. (TSCA specifies that these requirements are in addition to any under CWA or CERCLA. e.g. CERCLA requires spills of 1 pound or more to be reported to NRC.)	As soon as possible after discovery, and within 24 hours: to EPA Region 5.	Not required to be submitted. Records of cleanup and certification of decontamination shall be documented.	EPA Region 5 Corrective Action Section 312-886-7890 For further information contact EPA Region 5 Corrective Action Section
SARA Title III Section 313 40 CFR 372 (Toxic chemical release reporting)	Covered facilities as defined in 40 CFR 372 subpart B are subject to toxic chemical release reporting for toxic chemicals and chemical categories listed in 40 CFR 372 subpart D.	Not applicable.	Annually by July 1: to EPA & SERC on EPA's Form R "Toxic Chemical Release Inventory Reporting Form" (EPA Form 9350-1, Rev.10/2011) Report aggregate releases (permitted & unpermitted)	Michigan SARA Title III Program accepts reports on behalf of SERC For further information contact Michigan SARA Title III Program 517-284-7272

Acronyms used in table:

AQD = Air Quality Division
 AST = Above Ground Storage Tank
 CAA = Clean Air Act
 CAFO = Concentrated Animal Feeding Operation
 CERCLA = Comprehensive Environmental Response, Compensation and Liability Act of 1980
 CFR = Code of Federal Regulations

 CWA = Clean Water Act
 DEQ = Michigan Department of Environmental Quality
 DOT = Department of Transportation
 EHS = Extremely Hazardous Substance
 EPA = U. S. Environmental Protection Agency
 EPCRA = Emergency Planning & Community Right-to-Know Act
 FIFRA = Federal Insecticide, Fungicide, & Rodenticide Act
 FL/CL = Flammable and combustible liquids
 FR = Federal Register
 HAP = Hazardous Air Pollutant

HazMat = Hazardous Materials
 HB = House Bill
 LARA = Michigan Department of Licensing & Regulatory Affairs
 LEPC = Local Emergency Planning Committee
 LNG = Liquefied Natural Gas

 LPG = Liquefied Petroleum Gas
 MCL = Michigan Compiled Laws

MDARD = Michigan Department of Agriculture & Rural Development
 MIOSHA = Michigan Occupational Safety and Health Administration
 MSP = Michigan Department of State Police
 NRC = National Response Center (U.S. Coast Guard)
 NREPA = Natural Resources & Environmental Protection Act
 ODWMA = Office of Drinking Water & Municipal Assistance

 OOGM = Office of Oil, Gas, and Minerals
 OPS = Office of Pipeline Safety (US DOT)
 OSC = On Scene Coordinator
 OWMRP = Office of Waste Management & Radiological Protection

PA = Public Act (Michigan)
 PCB = Polychlorinated biphenyl
 PEAS = Pollution Emergency Alerting System
 PHMSA = Pipeline & Hazardous Materials Safety Administration
 RMP = Risk Management Program

RRD = Remediation and Redevelopment Division
 SARA = Superfund Amendments and Reauthorization Act of 1986
 SERC = State Emergency Response Commission
 TRI = Toxic Chemical Release Inventory
 TSCA = Toxic Substance Control Act
 TSDF = Treatment, Storage & Disposal Facility
 US DOT = U.S. Department of Transportation
 USNRC = U. S. Nuclear Regulatory Commission

UST = Underground Storage Tank
 WRD = Water Resources Division

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*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations. Additional reporting requirements** might be found in **permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.**



**Summary of Regulatory Mechanisms Used by Wayne County for
Investigation and Elimination of Illicit Discharge Sources**

Discharge Type or Source	Agency	Regulatory Authority
Permitting Authority for sanitary sewage and waste matter into County Drains	FMD/WQMD	<p>Discharge of polluting materials to a waterway that is under the jurisdiction of the WCDPS - FMD will be considered pollution to a county drain and hence a violation of Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of \$25,000 or imprisonment.</p> <ul style="list-style-type: none"> • See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code • See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: Cleanup that is needed due to pollution in a drain that results in a lessening of the area of the drain can be determined to be an obstruction. The person causing said obstruction is liable for the expenses incurred by the Drain to mitigate that obstruction. <p>Wayne County Sewer Use Ordinance – Title V, Chapter 101</p>
Permitting Authority for County Road Drains	EDDPF	Public Highways and Private Roads Act 283, 1909 Sect. 224.19b
Soil Erosion from Construction Sites	<p>FMD-APA</p> <p>LRMD-CEA</p> <p>EDDPF-APA</p> <p>Local MEA and MDEQ</p>	<p>Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994 and associated rules</p> <p>Wayne County Code of Ordinances, Title V, Chapter 94 – Soil Erosion and Sedimentation Control</p>
Unlawful Disposal of Sewage and Industrial Wastes, Onsite Sewage Disposal (OSDS)	Wayne County Health Department	<p>Wayne County Code of Ordinances, Title V, including but not limited to, Chapter 105</p> <p>Public Health Code, Public Act 368 of 1978;</p>

Discharge Type or Source	Agency	Regulatory Authority
		<p>MCL 333.1101 et seq., including Part 127, Water Supply and Sewer Systems and associated rules</p> <p>Wayne County Ordinance No. 99-527, Wayne County On-Site Sewage Disposal System Evaluation and Maintenance Ordinance</p>
Illicit Connection of Sanitary Sewage from Public and Private Properties	Local DPW/ Building Depts.	<p>Michigan Construction Code: Public Act 230 of 1972, MCL 125.1504 and associated rules.</p> <p>Wayne County Code of Ordinances as described herein.</p>
Illicit Discharge of solid waste, rubbish, yard clippings and similar litter materials upon the public or private property or rights-of-way.	WCDPS	Wayne County Code of Ordinances, Title V, Chapter 97 – Litter Control
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987 and associated rules.
Discharges to surface of ground, surface water, or public sewer system, Discharges from Part 5 Rules and Industrial NPDES regulated facilities	MDEQ-WRD (PEAS Notification)	<p>Part 31, Water Resources Protection, and Part 41, Sewage System, of the Natural Resources and Environmental Protection Act (NREPA), 1994 PA 451 of 1994, as amended, MCL 324.3101 et seq, and associated rules</p> <p>Wayne County Code of Ordinances, Title V, Chapter 97 – Litter Control</p> <p>Wayne County Sewer Use Ordinance – Title V, Chapter 101</p>
Discharges from agricultural properties and livestock facilities	MDARD	Michigan Right to Farm Act, Public Act 93 of 1981
See “Release Notification Requirements in Michigan” for: Releases of Oil and Polluting Materials, Sewage, Flammable and Combustible Liquids, Hazardous	MDEQ- WRD & RRD, USEPA, US Coast Guard, NRCS, US DOT, MSP, Local PD, Local Fire Dept., LEPC,	See “Release Notification Requirements in Michigan”, Attachment F of WC MS4 Collaborative IDEP, for Appropriate Regulatory Authority

Discharge Type or Source	Agency	Regulatory Authority
Materials, Hazardous Substances, Infectious Substances, Hazardous Wastes, Leaking Above Ground and Underground Storage Tanks, Bulk Commercial Fertilizers and Pesticides, and Liquid Industrial Wastes	LARA, MDARD, Local Health Dept., and CDC	

Excluded Non-Storm Water Discharges Policy

Wayne County does not authorize illicit discharges; however, the following list of non-storm water discharges are excluded from being prohibited from discharge to the Wayne County municipal separate storm sewer system (MS4) if when detected they are identified as not being significant sources of pollutants to waters of the state.

- Discharges or flows from firefighting activities
- Water line flushing and discharges from potable water sources
- Landscape irrigation runoff, lawn watering runoff, and irrigation waters
- Diverted stream flows and flows from riparian habitats and wetlands
- Rising groundwaters and springs
- Uncontaminated groundwater infiltration and seepage
- Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits
- Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
- Air conditioning condensation
- Waters from noncommercial car washing
- Street wash water
- Dechlorinated swimming pool water from single, two, or three family residences

ATTACHMENT 3

ALLIANCE OF DOWNRIVER WATERSHEDS COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN

STORMWATER DISCHARGE PERMIT APPLICATION COLLABORATIVE ILLICIT DISCHARGE ELIMINATION PLAN



For the Alliance of Downriver Watersheds MS4s

Effective upon NPDES Permit issuance for a period of five (5) years.

Allen Park
Belleville
Dearborn Heights
Ecorse
Flat Rock
Gibraltar
Grosse Ile Township

Inkster
Lincoln Park
Melvindale
Riverview
Rockwood
Romulus
Southgate
Sumpter Township

Taylor
Van Buren Township
Wayne County
Westland
Woodhaven
Woodhaven-Brownstown
School District
Wyandotte

May 31, 2019

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ATTACHMENTS

- ATTACHMENT A: Complaint Track Form & Routine Field Work Log
- ATTACHMENT B: Advanced Investigation Procedure for Locating the Source of Suspicious Discharges
- ATTACHMENT C: Regional IDEP Training Program
- ATTACHMENT D: ADW Member Facilities to be Dye-Tested
- ATTACHMENT E: Outfall Screening Procedure for Identifying Potential Illicit Discharges
- ATTACHMENT F: Corrective Action Notification Letter
- ATTACHMENT G: State and Federal Regulatory Mechanisms

I. INTRODUCTION

This Collaborative Illicit Discharge Elimination Plan (IDEP) presents **the watershed-wide priority action plan that is being pursued to effectively and efficiently identify and eliminate illicit discharges within the Alliance of Downriver Watersheds (ADW)**. This Plan consists of existing and planned activities and strategies, anticipated through the duration of the permit, that ADW members are individually and collectively implementing to identify and eliminate illicit discharges and reduce pathogen levels in Ecorse Creek, Combined Downriver, and Lower Huron River watersheds. This collaborative plan builds on the collective knowledge of the ADW members and implementation team. Specifically, the plan starts by evaluating the status and trends of surface waters in the ADW to identify priorities, followed by investigation and remediation of problem areas. Such a strategy focuses resources on the most likely sources of pollution or illicit discharge, rather than on areas with low likelihoods of problems.

The Alliance of Downriver Watersheds (ADW) is a permanent watershed organization in southeast Michigan and formed under Public Act 517 of the Public Laws of 2004. The ADW formally established themselves in 2007, but members have been working together for many more years to manage the area's water resources. The ADW consists of 23 public agencies in the Ecorse Creek, Combined Downriver, and Lower Huron River Watersheds within Wayne County. The ADW is relatively urban in nature consisting of 203.3 square miles of land mass and more than 450,000 people (2010 census). Major watercourses within the ADW that flow into the Detroit River and Lake Erie include Ecorse Creek, Sexton Kilfoil Drain, Frank and Poet Drain, Blakely Drain, Brownstown Creek, Huron River, Silver Creek, and Woods Creek.

The consortium of agencies that make up the ADW meet on a regular basis and work together to cooperatively manage the rivers, lakes, and streams within the watershed. Examples of ADW efforts include long-term water quality monitoring, stormwater permit compliance and reporting to the State, submittal of grant applications for water quality improvements, public education, and illicit discharge identification and elimination. Collaborative IDEP efforts began in 2007 when the ADW budgeted \$101,094 for Wayne County Department of Public Services to provide staff training and to perform problem area identification across the watershed area over a two-year period. Since 2010, the ADW has budgeted over \$840,000 for collaborative IDEP activities. Over 150 ADW member staff have received IDEP training and Wayne County alone has performed IDEP advance investigation (specifically facility dye-testing) at over 280 commercial and municipal facilities throughout the ADW watersheds.

II. PRIORITY AREAS

There is evidence of elevated levels of *E.coli* throughout portions of the ADW. An *E.coli* total maximum daily load (TMDL) allocation plan was developed for the Ecorse Creek watershed by the MDEQ in 2008. ADW member municipalities support a robust program to monitor surface waters for chemistry, biology and stream flow. Monitoring conducted by citizen volunteers, Huron River Watershed Council (HRWC), Wayne County, and MDEQ staff have established baseline conditions, current status and trends over the last six years in the ADW. Analysis of the monitoring data has allowed the ADW Technical committee to prioritize IDEP work areas. The data used includes: MDEQ Bacterial Source Tracking (BST) studies conducted in 2007 within the Ecorse Creek watershed; monitoring conducted by Wayne County across the ADW through the MDEQ grant in 2007-2008; monitoring conducted by Wayne County in 2015 through a SAW grant; and, annual volunteer and staff monitoring funded by the ADW beginning in 2012 that continues through the present. Priority areas may change during the course of the permit based on new data and/or elimination of certain areas based on investigation.

To identify priority IDEP work areas, the ADW Technical Committee uses the following process and criteria. At the end of each sampling season (usually in February or March), the committee evaluates the past year's surface water monitoring results. The monitoring includes a number of long-term sampling stations and 3-5 one-season investigative stations. Investigative stations are used to subdivide watersheds in an attempt to narrow in on potential pollutant sources. New or unusual results are flagged and discussed. The team evaluates the biological and chemical status at each monitoring site and summarizes results for subdrainages across the three watersheds. The direction and amplitude of trends are also evaluated. Drainages with the worst current conditions and trends are listed for prioritization according to the below criteria. Observations by the monitoring team and volunteer collectors about short-term conditions, climatic variables and other influences are also discussed. The criteria are regularly evaluated for revision.

The criteria used to identify them as a priority included:

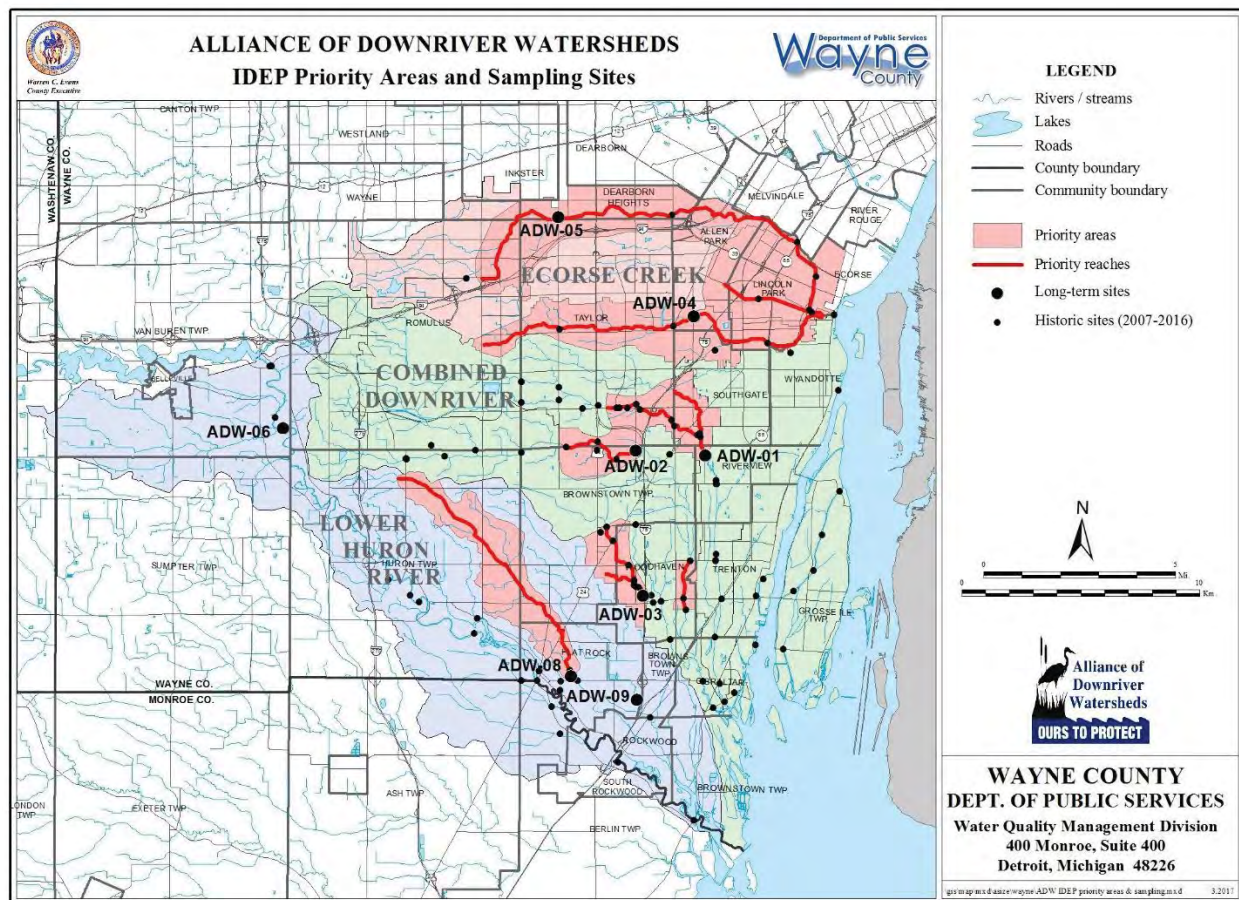
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling
- Wayne County's 2007 IDEP Monitoring found 3 or more monitoring events with one or more elevated IDEP monitoring parameters
- Areas upstream of sites with unexplained, declining macroinvertebrate populations

Priority IDEP Work Areas

Eight stream segments were identified by the ADW Technical Committee as Priority IDEP Work Areas (Figure 1) for the [permit period]. Three of the 8 areas are within the Ecorse Creek watershed (*North Branch Ecorse Creek, LeBlanc Drain, S. Branch Ecorse Creek*); 4 areas are within the Combined Downriver watershed (*Blakely Drain, Frank & Poet Drain and Brownstown Creek*); and 1 of the 8 areas are within the Lower Huron River watershed (*Silver Creek*). The areas that drain to these eight stream segments constitute approximately 28% of the total ADW area. These areas are shown in Figure 1.

Within the Priority Areas, ADW members will implement all of the Collaborative IDEP Activities described below. The ADW will also dedicate the majority of their annual ADW IDEP budget, during the term of the permit, to perform IDEP Advanced Investigations (IDEP#2) and Inspection of ADW Member Facilities (IDEP#6) to aggressively identify and eliminate sources of human sewage and elevated bacteria in these Priority Areas.

Figure 1: IDEP Priority Work Areas and Monitoring Sites



Routine IDEP Areas

All other areas of the ADW are being classified as Routine IDEP Areas. Within these Routine Areas, ADW members will implement the Collaborative IDEP Activities as described below, but little of the annual ADW IDEP budget will be utilized to implement these activities. Collaborative IDEP activities in these routine areas will focus on (IDEP #3: Staff Training) and (IDEP #10: Volunteer Training) to identify and report suspicious discharges including sanitary sewer discharges to storm sewers or surface waters. In addition, the Inspection of ADW Member Facilities (IDEP#6) will also be performed in the Routine IDEP Areas to identify and eliminate sources of human sewage and elevated bacteria.

III. COLLABORATIVE IDEP ACTIVITIES

IDEP# 1: IDEP Investigative & Progress Evaluation Monitoring

Funding: ADW

Activity Description: Consistent with the ADW's 5-year monitoring strategy, the ADW will utilize HRWC, Wayne County, and volunteers to perform instream water quality monitoring to identify problems areas, prioritize advanced investigation activities, and track water quality data trends to assess IDEP progress. Eight (8) long-term sites have been established and will be monitored annually along with four (4) additional annual rotating investigative sites to attempt to identify new problems and/or refine priority action areas and advance investigation activities (see Figure 1).

Schedule: Annually, April – September

ADW Member Responsibilities:

- ADW
 - Review and approve annual budgets and work plans to ensure resources are directed to the appropriate areas
 - Conduct annual monitoring at 8 long-term sites and 4 investigative sites as outlined in the ADW monitoring plan (see TMDL Implementation Plan)

Measure of Assessment:

- Number/portion of sites sampled

BMP Goal:

- 100% of long-term and investigative sites sampled, as outlined in the ADW monitoring plan

IDEP #2: Environmental Hotline and Coordinated Complaint Response

Funding: Wayne County, ADW Members

Activity Description: Wayne County operates an environmental hotline to field and respond to environmental complaints including illegal dumping and suspicious discharges. Local communities also receive pollution complaints directly from residents. Local communities will promote the use of the County hotline number by their residents (as discussed in the ADW Collaborative Public Education Plan) and assist with and/or perform follow up complaint response as appropriate. Community staff may also identify a potential pollution issue during their day-to-day activities. These issues will be handled just like a pollution complaint from a resident.

Investigative responses will range from a site visit that fails to confirm a problem to full scale advanced investigation to identify the source and eliminate the illicit discharge.

Schedule: Continuous

ADW Member Responsibilities:

- ADW
 - Develop and distribute a log sheet that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities. See Attachment A.
 - Develop and distribute a complaint response form to be utilized by ADW members. See Attachment A.
 - Maintain a list of community contacts and update annually via annual ADW membership General Facilitation survey.
- Communities and nested school districts
 - Provide the county with a contact person for addressing pollution complaints.
 - Track status of complaints handled internally or those referred to them.
 - Track and record follow up communication from resident complaints as appropriate.
 - Investigate and resolve complaints within their MS4.

- Wayne County
 - Provide technical guidance as requested by local communities.
 - Track the status of any pollution complaints that they investigate.
 - Track and record follow up communication regarding complaints as appropriate.
 - Investigate and resolve complaints within their MS4.

Measures of Assessment:

- Number of complaints received, referred, and investigated
- Number of issues identified
- Number of issues resolved

BMP Goal:

- 100% of complaints addressed and plan for resolution identified

IDEP #3: Priority Area IDEP Advanced Investigations

Funding: ADW

Activity Description: Using water quality data, system data/knowledge, and/or pollution complaints, the ADW Technical Committee will continue to prioritize areas for advanced investigations to identify and eliminate the source of illicit discharge/poor water quality. Priority areas may change during the course of the permit based on new data and/or elimination of certain areas based on investigation. The Wayne County Water Quality Management Division will lead investigation efforts in the priority areas, as identified in Section II of this plan, with assistance from the local communities. Advanced investigations may include outfall/stream surveys, instream water quality investigative monitoring, manhole inspection or sampling, dye-testing, smoke testing, or televising. Procedures for these investigative methods can be found in Attachment B. When a potential IDEP issue is suspected outside the participating members/ jurisdictions, it will be referred to the appropriate jurisdiction for their follow-up. The referral will occur in writing and include the rationale for the referral.

Schedule: Years 1-5 of permit for IDEP Priority Work Areas

ADW Member Responsibilities:

- ADW
 - Review and approve annual budgets and work plans to ensure resources are directed to the appropriate areas.
 - Hold ADW Technical Committee discussions to review ongoing investigations. The Technical Committee will also provide its recommendations for priority areas to Members. Members will provide feedback on the appropriateness of the selected priority areas and can also nominate areas for priority investigations. Nominations will be taken once every 5 years or more frequently if deemed necessary by the Technical Committee. Nominations will be reviewed by the Technical Committee to determine if they should be included for priority investigation.
 - Facilitate between Wayne County and MS4s on strategies to locate sources.

- Communities and Nested School Districts
 - Assist the County in conducting advanced investigations to locate sources. This may include providing maps and staff, tracking suspicious discharges up their MS4s, and supplying staff/equipment/contractor as the situation requires (e.g. closed circuit televising equipment).
 - Work with property owners to eliminate identified sources and track correction measures.
 - Lead enforcement measures as appropriate.
- Wayne County
 - Lead investigations in priority areas to identify illicit discharge sources.
 - Track investigation efforts and provide reports.

Measures of Assessment:

- Number of outfalls inspected/dry weather screened
- Length of streams surveyed
- Amount of instream water quality investigative monitoring performed
- Number of manhole inspections
- Amount of dye testing performed
- Amount of smoke testing performed
- Amount of televising performed
- Number of illicit connections/discharges found and resolved

BMP Goals:

- Follow the advanced investigation protocol for Priority Area IDEP Advanced Investigations (Attachment B).
- 100% of known illicit connections resolved or plan in place for resolution

IDEP #4: Staff Training

Funding: ADW

Activity Description: There are several mechanisms available for IDEP training for various competencies as described below. Each permittee will have at least one person trained at the Investigator Level and 50% of field staff at the Alert Observer Level. Field staff is defined as those working at least 50% of their day out-of-the-office and includes Department of Public Works/Services staff and community building/plumbing inspectors.

Investigator Level

The Wayne County Illicit Discharge Investigator Training (a half day training workshop) where attendees are taught how to identify and investigate the sources of illicit discharges including failing septic systems, seepage from sanitary sewers, illegal dumping, and suspicious discharges from outfalls. A competency exam is also administered at the end of the workshop.

Alert Observer Level

Training at this level can consist of one of the following:

- The Alert Observer IDEP Training (a 30 minute to 1 hour workshop) which provides the goals of the IDEP program, how to recognize illicit discharges and conduct field screenings, and the mechanisms to report suspicious discharges.
- The Working for Clean Water municipal staff training (a 15-minute video) where attendees are provided a general overview of the IDEP program, how to recognize illicit discharges, encouraged to report suspicious discharges, and provides pollution prevention and good housekeeping best management practices.

In addition, an IDEP Tip Card for Municipal Staff, which was developed by the Southeast Michigan IDEP Work Group, will be provided to field staff for both training programs. The Tip Card provides photographic examples of illicit discharges and phone numbers to report complaints.

Each community and county should have at least one person who is trained at the Investigator Level. If not currently, this will be obtained in Year 1 of the permit. This level of training will be maintained. Wayne County and the ADW will continue to offer the Investigator Training Workshop to ADW membership every other year according to the Southeast Michigan Regional IDEP Training Plan (See Attachment C). ADW staff will look to extend the training plan another 5 years or offer an alternate training program if one is not available.

The Working for Clean Water video will be made available on the ADW's website or by searching "IDEP Municipal Training" on www.YouTube.com. The Alert Observer Training Workshop will be included in the municipal pollution prevention training every other year according to the IDEP Training Plan (See Attachment C). Additional training opportunities can be arranged if demand warrants. The Tip Card will be distributed at the Investigator and Alert Observer trainings and can be obtained on the ADW's website.

Schedule: One person trained at the Investigator Level, confirmed annually
50% of field staff will be trained at the Alert Observer Level by Year 3 of the permit

ADW Member Responsibilities:

- ADW
 - Provide funding for the Investigator Training and Alert Observer Training Workshops
 - Provide Working for Clean Water video on ADW website
 - Provide Tip Card on ADW website
- Communities, Wayne County
 - Provide IDEP training to field staff
 - Provide field staff the IDEP Tip Card for Municipal Staff in conjunction with the training sessions
 - Document and track staff training

Measures of Assessment:

- Number of staff trained

BMP Goals:

- 1 person per MS4 trained at Investigator Level
- 50% of field staff trained at the Alert Observer Level

IDEP #5: Inspection of ADW Member Owned Facilities

Funding: ADW

Activity Description: Dye-testing will be conducted on ADW member-owned or operated facilities by County IDEP staff for the purpose of identifying any illicit connections or illicit discharges. Any identified issues will be corrected by owner. Many of the ADW member-owned facilities have already been dye-tested. A list of facilities that have not yet been dye-tested is included as Attachment D. Any changes to this list during the course of the permit will be submitted to the DEQ.

Schedule: Years 1-2 of permit for Priority IDEP Work Areas
 Years 3-5 of permit for Routine IDEP Areas

ADW Member Responsibilities:

- ADW
 - Provide funding for facility dye-testing
- Wayne County
 - Provide staff to conduct facility inspections
- Communities and School Districts:
 - Provide the ADW a list of facilities needing to be dye tested.
 - Provide access to facilities and plans, if available, and storm/ sanitary sewer maps for the immediate area.
 - Repair/correct illicit connections/discharges that were revealed during the site inspection. If the discharge is significant, take immediate steps to stop the illicit discharge

Measures of Assessment:

- Number of facilities dye tested
- Number of issues identified
- Number of issues resolved

BMP Goals:

- Develop a completed list of ADW member-owned facilities
- 100% of ADW member-owned facilities dye tested in priority areas
- 50% of ADW member-owned facilities dye tested in routine areas
- 100% of issues addressed, or a plan in place to address

IDEP #6: Visual Inspection during Routine Field Operations

Funding: ADW, Wayne County, and Communities

Activity Description: Consistent with IDEP#4 & IDEP#9, field staff involved in various work programs have been trained to identify and report suspicious discharges during routine field operations. Routine field operations may include:

- Catch basin cleaning/repairs
- Mosquito treatment of catch basins for West Nile Virus
- Street and parking lot sweeping
- Re-ditching and open ditch maintenance, and
- Sanitary sewer maintenance (cleaning, CCTV, lining)

In order to aid in this activity, the ADW will develop and distribute a consistent procedure and forms for ADW members to appropriately document their response to potential illicit discharge complaints and corrective actions taken to eliminate illicit discharges. A log form will also be developed that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities (form to include Wayne County hotline number).

Community field staff will be reminded to be alert for illicit or suspicious discharges, especially those in Priority Areas. This reminder will include key points in identifying and reporting suspected illicit discharges.

Schedule:

- Routine Maintenance Field Work - Continuous
- Training – see IDEP #4 and IDEP #9
- Develop consistent template for IDEP procedures and recommended responses for use by field staff
- Develop checklist for ADW field staff to document that illicit discharges were looked for during routine maintenance activities
- Reminder to Priority Area Members– two times per year

ADW Member Responsibilities:

- ADW
 - Develop and distribute a consistent procedure and forms for ADW members to appropriately document their response to potential illicit discharge complaints and corrective actions taken to eliminate illicit discharges. See Attachment A.
 - Develop and distribute a log sheet that ADW member's field staff will use to document that illicit discharges were looked for during routine maintenance activities (log to include Wayne County hotline number). See Attachment A.
- Communities, Wayne County and nested school districts
 - Train appropriate field staff to identify signs of illicit discharges and respond accordingly.
 - Require field staff to use the ADW's illicit discharge checklist to document that illicit discharges were looked for during routine MS4 maintenance activities.
 - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
 - For Priority IDEP Work Areas, notify field staff that there is an *E. coli* issue and instruct them to be especially observant and report any suspicious areas to ADW or county staff.

Measures of Assessment:

- Number of IDEP issues referred and investigations completed
- Number of illicit connections/discharges found and resolved

BMP Goals:

- Track all known illicit connections/discharges
- 100% of known illicit connections/discharges resolved, or plan in place to resolve

IDEP #7: Point of Storm Water Discharge – Dry Weather Screening

Funding: Communities and nested school districts

Activity Description: Dry weather screening of points of storm water discharge will occur in Priority IDEP Work Areas when identified as the appropriate IDEP advanced investigation technique. Dry weather screening may also occur in response to suspicious discharge complaints. Any new outfalls identified by permittees will also be screened once. A procedure for performing outfall screening was developed for use by the ADW members as part of the development of this Collaborative IDEP.

Schedule: Years 1-5 of permit for Priority IDEP Work Areas, as part of Priority Area IDEP Advanced Investigations
As needed based on complaints

ADW Member Responsibilities:

- ADW
 - Develop and distribute a consistent procedure and forms for ADW members to appropriately document dry weather screening activities (Attachment E).
 - Maintain a list of community contacts and update annually.
 - Review of reported issues at quarterly ADW Technical Committee meetings.
- Communities and nested school districts
 - Document dry weather screening inspections
 - Track status of complaints handled internally or those referred to them.
 - Track and record follow up communication from resident complaints as appropriate.
 - Investigate and resolve complaints within their MS4.
 - Require field staff to utilize the ADW procedure and forms for documenting responses to potential illicit discharge complaints/reports and corrective actions taken to eliminate illicit discharges.
 - Perform dry weather screening of new outfalls within 6 months of construction or taking ownership.
- Wayne County
 - Provide technical guidance as requested by local communities.
 - Track the status of any pollution complaints that they investigate.
 - Track and record follow up communication regarding complaints as appropriate.
 - Investigate and resolve complaints within their MS4.
 - Perform dry weather screening of 10% of County/stream crossings using ARC/ADW dry weather screening procedures.

Measures of Assessment:

- Number of inspections
- Number of illicit discharges found/corrected

BMP Goals:

- 100% of known illicit connections/discharges resolved, or plan in place to resolve

IDEP #8: Mapping of Storm Water Outfalls to Waters of the State

Funding: ADW with Wayne County providing GIS data management

Activity Description: A watershed-wide GIS database and map of known outfalls to waters of the State is being compiled and will be maintained. A clearinghouse for ADW digital storm sewer maps will also be established. These maps will be compiled based on available GIS data from ADW members. In addition, field surveys will be performed to fill in data gaps in priority reaches, as shown in Figure 1. This activity to centralize data will be an ongoing effort that will facilitate source-tracking and ease reporting to the MDEQ overtime.

Schedule: Initial mapping completed by December 2019
Annual survey and map/database update

ADW Member Responsibilities:

- ADW/Wayne County
 - Initiate map development of centralized datasets of stormwater outfalls, discharge points and MS4 system assets based on available GIS data from ADW members. A map of outfalls to waters of the State within the ADW will be prepared.
 - Perform field surveys to GPS and fill in data gaps in outfalls to waters of the state, stormwater discharge points and MS4 system assets within IDEP priority reaches. Update centralized database and maps.
 - Update the watershed's outfall/discharge point map on an annual basis.
- Communities and Wayne County
 - Provide existing GIS datasets of storm sewer systems and points of discharge to initiate development of centralized datasets of stormwater outfalls, discharge points and MS4 system assets.
 - Update maps of outfalls/discharge points on an annual basis and provide to the ADW.

Measures of assessment:

- Portion of watershed area with known outfalls mapped in GIS

BMP Goal:

- 100% of available data from ADW members incorporated into centralized dataset

IDEP #9: Volunteer Training

Funding: ADW via Public Education and Progress Evaluation budgets

Activity Description: Participants in the various volunteer monitoring activities being implemented in the ADW have been and will be instructed and given informational materials as part of their training on how to identify and report illegal dumping and suspicious discharges. This will be carried out by Wayne County and/or HRWC staff during training for the various volunteer monitoring programs.

Schedule: Annually as volunteer monitoring training occurs.

ADW Member Responsibilities:

- ADW
 - Financially support volunteer monitoring activities
 - Provide annual volunteer training
- Communities, Wayne County and nested school districts
 - Promote citizen involvement in Volunteer monitoring efforts at which volunteers will receive training on the identification and reporting of suspicious discharges

Measures of Assessment:

- Number of volunteers trained

BMP Goal:

- Training held annually during each year of the permit cycle

IDEP #10: Method to Evaluate IDEP Effectiveness

Funding: ADW, Wayne County, communities, nested school districts

Activity Description: Records for each of the above IDEP activities will be kept and a biennial summary report submitted documenting the output of each activity and the summary number of illicit discharges identified and eliminated. Overall effectiveness will be based on the long-term natural resource response as determined through the progress evaluation monitoring described below (see Progress Evaluation Monitoring below).

Schedule: Continuous with summary report submitted biennially.

ADW Member Responsibilities:

- ADW
 - Conduct instream monitoring for select indicators to determine the effectiveness of IDEP efforts. The monitoring information will be evaluated and assessed during future priority area discussions.
 - Continue watershed-wide monitoring for select parameters to assess the general health of the river.
- Communities, Wayne County and nested school districts
 - Keep records of their activities with respect to the above IDEP activities and provide such information to ADW staff annually to assist with the collaborative reporting and IDEP effectiveness evaluation.

IV. CORRECTIVE ACTION NOTIFICATION

The procedure for responding to illicit discharges will vary depending on the nature of the discharge (ex: illicit connection to a storm sewer, failing septic system, illegal dumping, etc.) and jurisdiction of the discharge. Similarly, the timeline for eliminating a discharge will vary depending on the geographic extent of the issue, the complexity of the corrective action, responsible party's financial constraints, etc. Deviations to the procedures below may be made on a case-by-case basis and will be documented in the Permit Progress Report. In all cases, corrective action measures will be implemented to the maximum extent practicable and as soon as practicable. The status of corrective actions will be included in the Permit Progress Report to the MDEQ.

Discharges from Private Sources to MS4s

If the source of an illicit discharge has been determined to be privately owned, discharging to an MS4 and regulated by the MS4, the MS4 owner (city, village, county) will use the procedure below to notify and correct the illicit discharge.

It should be noted that discharges to drains within townships are typically under the jurisdiction of the county road agency, who is ultimately responsible for elimination. However, corrective action and enforcement for discharges to their MS4 is handled under the local jurisdiction's codes and ordinances, the county health department's sanitary code or other appropriate regulatory authority. In these situations, corrective action notification and enforcement will be led by the township, who will coordinate with the health department or other agencies, as needed.

First Notice: Notification of Problem and Correction Needed Once the source(s) of an illicit discharge has been identified, the MS4 owner will provide the first written notice to the responsible party of the illicit discharge by registered mail within 7 days. The first written notice will notify the responsible party of the illicit discharge, the MS4 owner's regulatory authority to require correction, and the potential enforcement actions if the discharge is not addressed. The responsible party will be required to contact the MS4 owner regarding plans for correction within 14 days. Tracking of all notifications and documentation of registered mail receipts shall be retained by the MS4 owner. A sample letter is included in Attachment F.

Final Notice: If 14 days have passed from the date of the 1st written notice and no response has been received from the responsible party, a second written notice will be sent. The second written notice will remind the responsible party of the illicit discharge, the prior notice, the regulatory authority to require correction, and the potential enforcement actions that will occur if the discharge is not addressed. The responsible party will be given an additional 14 days to contact the MS4 owner regarding plans for correction.

Enforcement: If 30 days have passed from the date of the first written notice, a citation will be issued. The MS4 owner will issue civil infractions as described in the Enforcement Response Procedure (ERP) for the violation of the applicable IDEP-related ordinances as listed in individual permittee stormwater management plans. A citation shall include fines and may require a court appearance.

Corrections/Repairs:

In the event that the owner does not contact the MS4 owner within 14 days of the Final Notice and/or the discharge is not addressed by the owner 30 days after civil infractions have been issued, the MS4 owner will pursue other enforcement actions such as: discontinue water service to the property and designate the property uninhabitable, place a lien on the property, and initiate efforts to complete the necessary repairs, as authorized by law.

Discharges from Public Properties to MS4s

If the discharge is emanating from a public property (other than the permittee's property), the MS4 owner will request correction or a written corrective action plan be submitted within 60 days of notification. If the discharge cannot be corrected within 60 days of notification, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water. The corrective action plan will include a schedule for completion with a goal of completion within 18 months of plan approval. The plan will be reviewed by the MS4 owner within 60 days and approved or denied with explanation. Approval of the plan will not waive any local permitting requirements of the community.

Discharges from Permittee's Properties

For discharges emanating from the permittee's own property, a corrective action plan will be developed within 60 days of discovery of the discharge. The plan will include a schedule for completion with a goal of completion within 18 months of plan completion. If the discharge cannot be corrected within 60 days of discovery, interim measures shall be implemented, as practical, to reduce the impact of the discharge on the receiving water.

Discharges from Septic Systems

For illicit discharges from failed septic systems, the corrective action procedures of the Wayne County Health Department will be followed. This procedure is documented in the County's stormwater management plan.

V. LEGAL AUTHORITY

The legal authority that allows permittees to prohibit, investigate and/or enforce the correction of illicit discharges is established on an individual permittee basis. For most communities, legal authority is granted via the Plumbing Code, Sewer Use Ordinance, Nuisances Ordinance, and Municipal Civil Infraction Ordinance as indicated in the table below. Permittees will review their existing codes/ordinances/rules and provide a table that cross references the regulatory mechanism (chapter and section) with the items included in the table below. Table 1 provides the list of regulatory mechanisms by type of illicit discharge that are available to local, school and county agencies to investigate and eliminate illicit discharges. In some cases, permittees can seek the assistance of state and federal agencies to investigate and eliminate illicit discharges. Examples include sewage discharges from mobile home parks, discharges from non-municipal facilities that have a NPDES permit and agricultural properties as shown in Table 2.

Table 1. IDEP Regulatory Mechanisms Available to Permittees

Discharge Type or Source	Lead Enforcement Agency	Regulatory Authority
Discharges to city and village MS4s (except as noted below)	Local DPWs and Building Depts.	Varies by community. See individual stormwater management plans.
Discharges to school or township MS4s	School or Township	See individual stormwater management plans
Sanitary sewage and waste matter into County Drains	County Drain or Water Resource Commissions	<p>Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of \$25,000 or imprisonment.</p> <p>See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code at: http://legislature.mi.gov/doc.aspx?mcl-280-423</p> <p>See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: http://www.legislature.mi.gov/%28S%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&objectName=mcl-280-421</p>
Discharges to County Road Drains	Road Agencies	Public Highways and Private Roads Act 283, 1909 Sect. 224.19b
Soil Erosion from Construction Sites	Part 91 Authority	Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994
Discharges from Onsite Sewage Disposal Systems (OSDS)	Wayne County Dept. of Health	<p>http://www.waynecounty.com/hhs/onsite_sewage.htm</p> <p><i>Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta as follows:</i></p> <ul style="list-style-type: none"> -Prohibit discharges: Article III, Sec. 3.13.2 -Right to inspect: Article IV, Sec. 4.3 -Corrective action: Article IV, Sec. 4.5-4.7 -Penalties: Article XVI, Sec. 16.1 <p><i>Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance as follows:</i></p> <ul style="list-style-type: none"> -Right to inspect: Sec. 803 -Corrective action: Sec. 802 -Penalties: Sec. 804-815

Source: Modified from a table included in the Alliance of Rouge Communities Collaborative IDEP

Table 2 – IDEP Regulatory Mechanisms Available to State and Federal Agencies to Assist Permittees

Discharge Type or Source	State or Federal Enforcement Agency	Regulatory Authority
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987 http://www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-96of-1987.pdf
Discharges from Part 5 facilities and industrial NPDES regulated facilities	MDEQ-WRD	Part 31, NREPA, PA 451 of 1994
Discharges from agricultural properties and livestock facilities	MDARD	Michigan Right to Farm Act, Public Act 93 of 1981
Releases of Oil and Polluting Materials, Sewage, Flammable and Combustible Liquids, Hazardous Materials, Hazardous Substances, Infectious Substances, Hazardous Wastes, Leaking Above Ground and Underground Storage Tanks, Bulk Commercial Fertilizers and Pesticides, and Liquid Industrial Wastes	MDEQ - WRD & RRD, USEPA, USCG, NRCS, USDOT, MSP, Local Police & Fire Depts., LEPC, LARA, MDARD, Local Health Dept., and CDC	See Attachment G for appropriate regulatory authority

Notes: CDC = Center for Disease Control, LARA= Michigan Dept. of Licensing and Regulatory Affairs, LEPC=Local Emergency Planning Commission, MDA=Michigan Dept. of Agriculture & Rural Development, MDEQ WRD=Michigan Dept. of Environmental Quality Water Resources Division, MDEQ RRD= MDEQ Remediation and Redevelopment Division, MDLEG=Michigan Dept. of Labor and Economic Growth, MSP=Michigan State Police, NRCS=Natural Resources Conservation Service, USCG=US Coast Guard, USDOT=US Dept. of Transportation, USEPA=US Environmental Protection Agency.

Source: Oakland County Water Resources Commissioner's Office

STORMWATER DISCHARGE PERMIT APPLICATION



Complaint Tracking Form & Routine Field Work Log

For the Alliance of Downriver Watersheds MS4s

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Community Name: _____

Complaint made by: _____ Phone #: _____

Date: _____ Time: _____

Location of Problem: _____

Offending Party (if known) _____

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

Is this an Emergency? ☐ No ☐ Yes (then call 911)

Nature of Emergency: _____

Initial contact made to: ☐ 911 ☐ City Dept _____

☐ Wayne County 888-223-2363 ☐ PEAS Hotline (State) 800-292-4706

☐ Other _____

Pollution Complaint Tracking Form Illicit Discharge Elimination Program

Investigation Summary ☐ Initial Investigation ☐ Follow-up Investigation

Date of Investigation: _____ Investigating Agency: _____

Crew Members _____

Location of Discharge: _____

Investigation Location: _____

Observations (odor, color, volume, etc.): _____

Actions Taken (dye testing, notification letter, etc.): _____

Were photos taken? ☐ No ☐ Yes

Agency Referred to: _____ Agency Contact: _____

Method of Communication: ☐ E-mail* ☐ Letter/memo* ☐ Phone *Attached copies

Content of Communication: _____

Date Corrected or Resolved: _____

Routine Fieldwork Log – Illicit Discharge Elimination Program
Wayne County 24 hr Environmental Hotline 1-888-223-2363

Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? <input type="checkbox"/> No <input type="checkbox"/> Yes*
Location of Field Work:		

* If "Yes" is checked, the Pollution Complaint Tracking Form must be completed

STORMWATER DISCHARGE PERMIT APPLICATION



Advanced Investigation Procedure for Locating the Source of Suspicious Discharges

For the Alliance of Downriver Watersheds MS4s

Attachment B

I. Purpose

The purpose of this procedure is to describe the protocols to conduct advanced investigations in storm sewer systems to identify the source of a suspicious discharge. These investigations would be performed based on the priority area designation, results of field screening procedures or based on a pollution complaint. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

II. Performing Source Investigations

The investigation parameters will be selected based on the nature of the complaint or initial field screening results according to the parameters and threshold values indicated in the Field Screening Procedure for Identifying Potential Illicit Discharges Standard Operating Procedure. If working within a river/stream/open drain, then samples or observations will be taken at the origin of the suspicious discharge and at upstream locations. This will continue until the source is found or an enclosed storm sewer is located.

Determining Ownership

For complaint-based investigations, the owner/operator of the enclosed storm sewer will be determined. If it is suspected that a discharge originates from another jurisdiction, the other jurisdiction will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within 10 working days of the discovery of the discharge from the other jurisdiction.

For investigations based on outfall screening results, the ownership step is not required because it is assumed that outfall screening was completed by the owner/operator.

For investigations based on instream sampling results and the owner/operator is participating in the ADW Collaborative IDEP Plan, the owner/operator will be notified of the suspicious discharge and storm and sanitary sewer maps will be obtained. Investigations will continue with the assistance of the owner/operator. If the owner/operator is not participating in the ADW Collaborative IDEP Plan, then they will be notified in writing of the suspicious discharge and any pertinent information about the discharge. This will occur within a timeframe ranging from immediately/within 24 hours (for sources posing an imminent threat) or for non-emergency issues up to 5 working days of the discovery of the discharge from the other jurisdiction.

Source Investigations

Enclosed drain investigations will proceed, following discovery of a suspicious discharge. The site of the discharge will be resampled during dry conditions for the appropriate indicator parameter. The sample parameters will be the same as those used during the initial field screening. If no flow is present, a second site visit will be conducted within 4 weeks of discovery, weather permitting. If no flow is present during the second site, a third site visit will be conducted within 2 months of the date of the second visit, weather permitting.

Additional sampling/observations will be conducted upstream within the drainage system to narrow down the section of pipe from which the suspicious discharge is emanating. Sampling will be conducted as outlined in the Field Screening Procedure for Identifying Potential Illicit Discharges SOP.

Attachment B

Ideally, the sampling data or observations will allow staff to isolate a section of storm sewer to employ advanced investigation techniques. These techniques include televising the storm sewer, smoke testing, and conducting dye testing of homes, facilities, or sewers to verify a suspected illicit connection or discharge. The lead investigator will determine which of these techniques (or other technique) will be employed.

III. Closed Circuit Televising (CCTV)

CCTV inspections may be performed to determine if illicit connections are present in a storm drain. This allows for inspectors to identify suspicious taps to the drain. This work will be performed by a qualified staff or contractor. If possible, a video recording of the inspection will be performed. If possible, the lead investigator will be present during the CCTV inspection in order to direct additional efforts.

IV. Smoke Testing

Smoke testing may be performed to determine if a residence or facility is illicitly connected to the storm drain. This work will be performed by a qualified staff or contractor. This testing requires homeowner notification to ensure all plumbing traps are filled with water and to make them aware of the potential intrusion of smoke into their homes. The local fire department should also be notified prior to testing. Non-toxic smoke is used. The drain may be plugged at various locations to ensure the testing is limited to the area of interest. Smoke found exiting a building plumbing vent indicates that the home is illicitly connected to the storm sewer. Care must be taken to perform this testing during the appropriate weather conditions in order not to mistaken steam from a heating system or fog as smoke. This testing may also identify improper connections between the storm and sanitary system.

V. Dye Testing

Dye testing may be performed on plumbing fixtures (i.e. sinks, toilets, floor drains, etc.) within facilities/structures that are suspected of illicitly discharging non-stormwater flows into the MS4 to determine if they are properly connected to the appropriate sewer. Prior to administering a tracer dye, the lead investigator will submit a Notice of Intent to the MDEQ under General Rule 97 Certification of Approval Authorizing Tracer Dyes in Surface Waters. In addition, the following agencies shall be notified 48 hours prior to the application:

- Local Municipality
- Local Health Department
- Downstream Municipalities and Health Departments potentially affected
- Local Fire Department

Once approved, tracer dye will be applied to the appropriate plumbing fixture(s) per the manufacturer's recommendations and in a manner that will minimize potential effects to surface water. The following information will be documented when conducting a dye test:

- Facility or Building Name
- Date
- Location where dye is applied (i.e. second floor men's restroom)
- Time the dye is applied
- Time dye is observed in the field

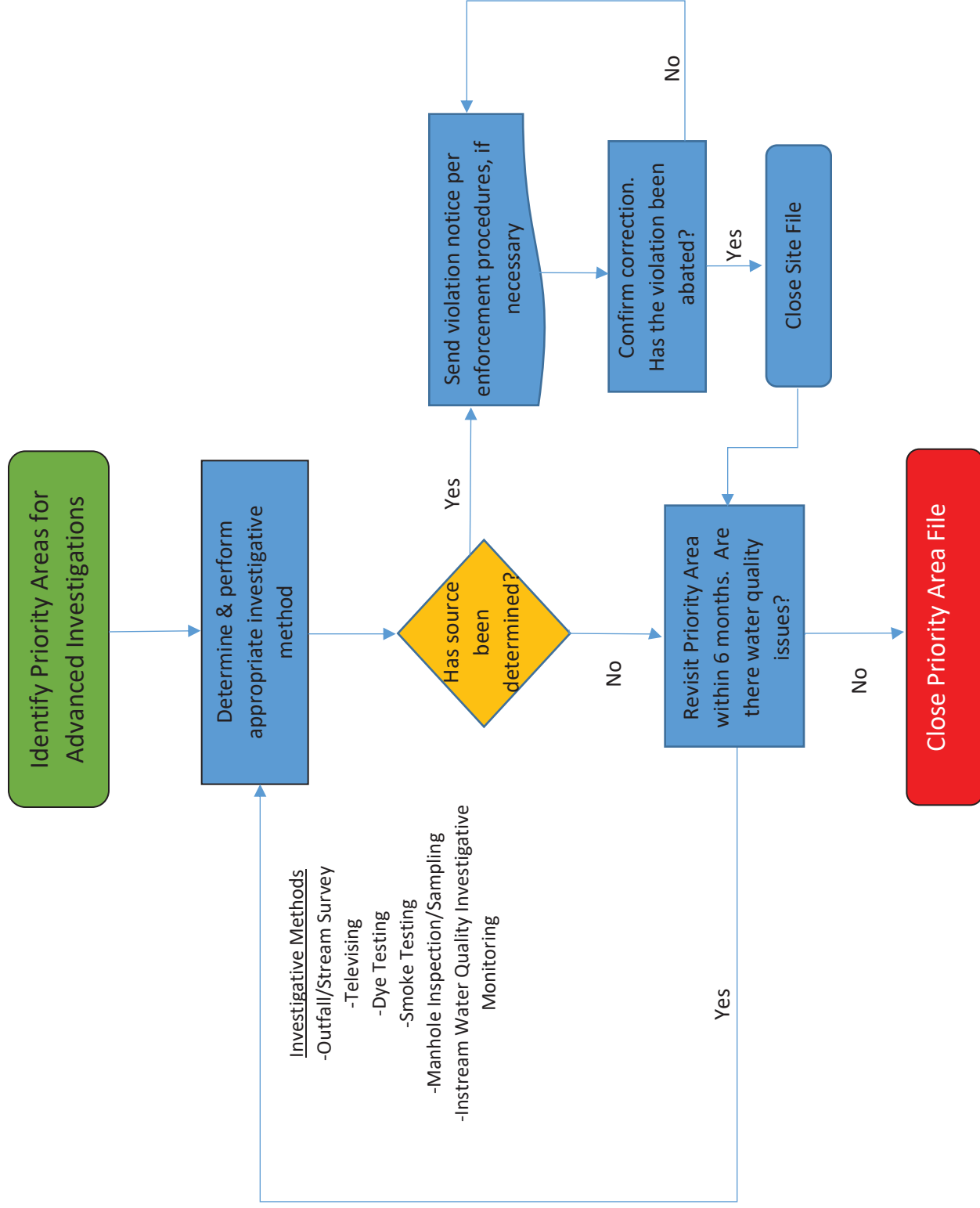
Attachment B

- Location where dye is observed (i.e. sanitary manhole, northeast of building)
- Time of Travel
- Follow up action, if needed

Sample dye test forms are included with this Attachment.

VI. Process for Revision

Any questions on this procedure should be directed to the entity's Stormwater Manager or the ADW Technical Committee. This procedure shall be reviewed once per permit cycle by the ADW Technical Committee for any updates.





Alliance of Downriver Watersheds

*Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division*

Facility Information Sheet

☐ Field Inspection ☐ Survey ☐ WMD Complaint, # _____

Date: _____

Address: _____ Community: _____

Name of Facility: _____

Type of Business: _____

Contact Person: _____ Phone Number: _____

Title: _____

SIC Code: _____ Priority: _____

Watershed: _____ Subwatershed: _____ Subarea: _____

Field Representative(s): _____

River Friendly Partners Program Information Requested: _____



Alliance of Downriver Watersheds

*Dye Testing Form adapted from
Wayne County Department of Public Services (Environment)
Water Quality Management Division*

Field Inspection Results

Date: _____

Address: _____ Community: _____

Name of Facility: _____

- ☐ Proper Connection - The Fixtures "dye tested" in this establishment have been found to be properly connected to the sanitary sewer system. No problems were noticed at time of inspection.
- ☐ Incomplete: _____
reason
- ☐ No Show - Unsuccessful attempt, unable to detect "dye" in the sanitary sewer.
- ☐ Violation/Illicit Connection/Improper discharge - Situation resulting in pollution of surface waters.
 - ☐ Illicit Connection
 - ☐ Improper Discharge
 - ☐ House Keeping

LIST ALL FIXTURES DYE TESTED:

Field Inspection Results

Date _____

Facility: _____

Information to Document:

- Location where dye is applied (i.e. second floor men's restroom)
- Time the dye is applied
- Time dye is observed in the field
- Location where dye is observed (i.e. sanitary manhole, northeast of building)
- Time of Travel
- Follow up action, if needed

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

STORMWATER DISCHARGE PERMIT APPLICATION



Regional IDEP Training Program

For the Alliance of Downriver Watersheds MS4s

**Southeast Michigan Regional
Illicit Discharge Elimination Program Training Plan
February 19, 2013**

Introduction

Southeast Michigan is a seven county region with a population exceeding 4.7 million and comprising 16 watersheds. Five of the counties (Wayne, Washtenaw, St. Clair, Macomb and Oakland), comprising 11 watersheds, have a stormwater discharge permit. The permit requires training in various aspects of illicit discharge elimination. Recent audits of permittees by the Michigan Department of Environmental Quality have requested documentation of such training. This document lays out a plan for training municipal staff that is consistent with the language in the forth coming stormwater permit. The plan provides background information, objectives, details, and a cost-share arrangement to provide stormwater-related training to the permitted communities.

Background

The Alliance of Rouge Communities (ARC) has sponsored the Basic/Advanced IDEP Training for the last few years. This training was made available to ARC members without charge. The participation in the training has decreased over the years. Wayne County has provided training to non-ARC members in southeast Michigan on a cost recovery basis, e.g. contracts with Eastern Michigan University, Washtenaw County.

In 2011, SEMCOG sponsored five municipal training sessions across Southeast Michigan that targeted pollution prevention actions at municipal facilities. These ½ day sessions also included an illicit discharge identification component designed to educate a broad audience on basic recognition and reporting techniques. Staff from Washtenaw, Livingston, St. Clair, Oakland, Macomb and Wayne counties helped to develop the content of the training and co-host the session at one of their facilities. The sessions were also co-hosted by the DEQ, which provided Industrial Operator Training at no cost in the afternoon of each session. Over 350 people attended the five training sessions and 107 people took the DEQ Industrial Operator.

Objective

The goal of this plan is to provide training to the southeast Michigan region focused on illicit discharge elimination and storm water pollution prevention. There are three main objectives of this plan. The first objective is to establish a framework that shares responsibility and costs of training on a regional basis. The second objective is to be efficient by maximizing class size not duplicating efforts and spreading the costs over the region. The third objective is to make it unnecessary to charge a fee for the training.

Plan

The plan calls for an alternating five year schedule of training between Wayne County's IDEP training program and SEMCOG's municipal facility training and illicit discharge recognition training provided by the host county. The training would be provided once a year. The period covered by this plan is January 2013 through December 2017.

Every other year beginning with 2013, Wayne County's IDEP Training will be provided to the region. Table 1 lists the responsibilities and schedule for each IDEP training session. In 2014 and 2016, SEMCOG's municipal facility training with illicit discharge recognition training will be provided. Table 2 lists the responsibilities for the SEMCOG municipal facility and illicit discharge recognition training.

Note: This schedule is consistent with the language concerning training in the new State stormwater permit.

Cost Sharing

The goal is to distribute cost among the region by rotating sites for the training, so that the trainings can be offered at no charge. This would reduce the cost to the ARC since the IDEP training registration would be handled by others and since it would be offered every other year. This will also reduce the cost to other permittees, since the IDEP training charge would be offered at no charge (a savings of around \$75 per attendee).

Table 1: Traditional IDEP Training Schedule and Responsibilities

Year	Staff Cost ¹	Facility/Refreshments ²	Registration ³	Print and Mail Certificates
2013	ADW, ARC	Wayne County	Wayne County	Wayne County
2015	ADW, ARC	Washtenaw County	Washtenaw County	Wayne County
2017	ADW, ARC	Macomb County	Macomb County	Wayne County

- 1- Will provide trainers for the event at no charge to the municipalities or other counties.
- 2- Will arrange for a training location and provide refreshments/snack
- 3- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

Table 2: SEMCOG Municipal Facility and Illicit Discharge Training Schedule and Responsibilities

Year	Staff Cost	Facility/Refreshments ³	Registration ⁴
2014	Host County ¹ , SEMCOG ²	St. Clair County	SEMCOG
2016	Host County ¹ , SEMCOG ²	Oakland County	SEMCOG

- 1- Will provide or arrange for trainers for the event in collaboration with SEMCOG.
- 2- SEMCOG donated time
- 3- Will arrange for a training location and provide refreshments/snack
- 4- Will handle advanced registration and sign-in the day of the event and create an advertisement for distribution to the region. Distribution will occur via email to the county stormwater coordinators.

By signing below, the parties agree to participate in the plan as outlined in Tables 1 and 2. The plan will become effective once all parties have signed it.

Macomb County Representative

W. MISTEROVICH
Signature
W. MISTEROVICH
Name/Title CHIEF DEPUTY MACOMB COUNTY PUBLIC WORKS
Date 05-17-2013
COMMISSIONER

Oakland County Representative

James A. Winkler
Signature
JAMES WINKLER / ASST. CHIEF ENG.
Name/Title
Date 4/17/13

Saint Clair County Representative

Steve French
Signature
Steve French
Name/Title DIRECTOR
Date 4-29-13

Washtenaw County Representative

Evan Pratt
Signature
EVAN PRATT
Name/Title Water Resources Commissioner
Date 8/8/12

Wayne County Representative

Kelly A. Cave
Signature
KELLY A. CAVE
Name/Title WAYNE CO. STORM WATER COORDINATOR
Date 11 APRIL 13

SEMOG Representative

Kathleen Lornalco
Signature
Kathleen Lornalco
Name/Title
Date 8/14/2013

Alliance of Rouge Communities Representative

Kevin L. Buford
Signature
Kevin Buford, ARC Chair
Name/Title
Date 3/28/13

Alliance of Downriver Watersheds Representative

Mark Gahry
Signature
Mark Gahry, Chairman
Name/Title
Date May 7, 2013

STORMWATER DISCHARGE PERMIT APPLICATION



ADW Member Facilities To be Dye-Tested

For the Alliance of Downriver Watersheds MS4s

Community	Facilities
Allen Park	Library
	Parks and Rec
	Fire Station
	DPS Building
Belleville	Belleville Fire Department
	Public Golf Courses
Dearborn Heights	No facilities left to test
Ecorse	No facilities in ADW to test
Flat Rock	Animal Shelter
	City Hall
	DPS Mechanic's Garage
	DPS Yard
	Fire Department
	Police Station
Gibraltar	Library
	Community Center - Annex
	School District Transportation & Maintenance Garage with salt storage
	DPW Building
	Carlson High School/Shumate Middle School
Grosse Ile	Parsons Elementary School
	Animal Shelter
	Water's Edge Municipal Golf Course
	DPS Building & Yard
	Recreation/Restaurant Building
	Grosse Ile Township Schools
	Grosse Ile High School
	Grosse Ile Middle School
	Meridian Elementary School
	Parke Lane Elementary School
Inkster	No facilities in ADW to test
Lincoln Park	Historical Museum
	Animal Control
Melvindale	Melvindale Library: 18650 Allen Rd (City reports already dye tested - confirm)
Riverview	Riverview Highland Golf Course Maintenance
	DPW Facility
	Fire Hall
	Forest Elementary School
	Huntington Elementary
	Kennebec Park
	Kingswood Nature Park
	Memorial Elementary
	Riverview High School
	Riverview Schools Operations Building
	Riverview Schools Warehouse
	Seitz Middle School
	GSRP Preschool
Rockwood	Municipal Building (includes Fire & Police Stations)
	Public Works & Salt Storage
	Community Center
Romulus	Animal Shelter
	Romulus Athletic Center
	Romulus Community Schools
	Romulus Elementary School
	Barth Elementary School
	Romulus Senior High School
	Wick Elementary School
	Hale Creek Elementary School
	Romulus Middle School
	Romulus Virtual Learning Center
Southgate	Downriver Animal Control Building
	Southgate Municipal Golf Course
Sumpter Twp	no facilities list
Taylor	Fire Station (Goddard)
	Fire Station (Eureka)
	Lakes of Taylor Golf Course
	Library
	Kinyon Elementary School
	Taylor School District
	Blair Moody Elementary School
	Taylor Parks Elementary School
	Robert J. West Middle School
	Clarence Randall Elem. School
	Bernice McDowell Elem. School
	Holland Elementary School
	Myers Elementary School
	Taylor Virtual Learning Academy
	Eureka Heights Elementary School
	Hoover Middle School
	Taylor High School
	Johnson Preschool
	Taylor SportsPlex
Van Buren	No facilities in ADW to test
Westland	No facilities in ADW to test
Woodhaven	Civic Center
	Animal Shelter
	City Hall
	DPW Yard
	Fire Station 1
	Fire Station 2
	Police Station
	Water Garage
Woodhaven - Brownstown Schools	No facilities left to test
Wyandotte	Recreation Center/Yack Arena
	Police Station
	Wyandotte Animal Pound
	Fire Station #1
	Fire Station #2
	Public Schools Wilson Middle School
	DPW Yard

STORMWATER DISCHARGE PERMIT APPLICATION



Outfall Screening Procedure for Identifying Potential Illicit Discharges

For the Alliance of Downriver Watersheds MS4s

Attachment E

I. Purpose

The purpose of this procedure is to describe the protocols to inspect stormwater outfalls for the presence of illicit discharges. The Michigan Department of Environmental Quality (MDEQ) requires this procedure for stormwater discharges from municipal separate storm sewer systems (MS4) as part of an entity's National Pollutant Discharge Elimination System (NPDES) permit application.

II. Performing Field Observations at Outfalls

Outfalls will be assessed during dry weather conditions focusing on the criteria listed below. This assessment will be conducted following at least 48 hours with no precipitation.

1. Presence/absence of flow
2. Deposits/stains on the discharge structure or bank
3. Vegetation condition
4. Structural condition
5. Biology, such as bacterial sheens, algae, and slimes
6. Water clarity
7. Color
8. Odor
9. Floatable materials

A field form (provided at the end of this procedure) that documents the condition of the outfall and any discharge will be completed. In addition to the assessment of the field screening criteria, GPS positioning will be obtained for new or previously unscreened outfalls.

III. Performing Field Screening

Only individuals that have been trained to do so will perform field screening activities. Acceptable training includes the following elements: goals of the IDEP program, how to recognize illicit discharges and sampling techniques. Four months of IDEP field experience consisting of outfall screening and/or advanced investigations can be substituted for classroom training.

If the visual observations indicate a potential illicit discharge, flow is observed and the source of the flow is not immediately identifiable then sampling will be performed. Based on the suspected discharge or the pollutant of concern, some or all of the following parameters will be assessed:

1. pH will be sampled if an industrial discharge is suspected. A pH measurement will be obtained using calibrated portable field meter such as pH pen or multi-parameter probe.
2. Detergents will be sampled if flow is observed to have foam or suds or if a sanitary discharge is suspected. The sample will be field screened for surfactants using a colormetric method such as CHEMets kit # K-9400 (www.chemetrics.com). The operating range of the test should be between 0 and 3 mg/L.
3. *E. coli* will be sampled if a sanitary discharge is suspected. These samples will be collected in a sterile 100 mL bottle, stored on ice, and transported to a laboratory for analysis. The analytical range should be between 10 and approximately 24,000 colonies/100 mL. Care should be taken not to disturb any accumulated sediment when collecting the *E. coli* sample.
4. Other parameters – Additional samples may be collected depending on the suspected source.

Attachment E

Disposable gloves will be worn to collect all samples. Gloves will be changed out between sampling sites. *E. coli* samples must be collected directly into the laboratory container, while sample collection cups may be used for pH and surfactants. Decontamination procedures for reusable sample collection containers consists of a triple rinsed with site water prior to taking a measurement.

E. coli samples shall be delivered to the laboratory with sufficient time for the samples to be analyzed within the method specific hold time. Confirmation of method specific hold times shall be obtained from the laboratory at the onset of sampling efforts. For *E. coli* analysis, the goal of the sampling team will be to deliver samples to the laboratory within 6 hours of collection where sample processing will occur within 2 hours for a total hold time of 8 hours. However, as these samples are intended to be used for screening purposes, a total hold time of 24 hours will be acceptable if it is not cost effective to meet the shorter hold time.

If sample result exceeds the threshold(s) provided in Table 1, additional investigations are recommended to locate the source of the suspicious discharge.

Field screenings will be conducted in conjunction with field observation procedures as described in Section II. Screenings may also be conducted on an as needed basis if suspicious discharges are discovered by field staff during day-to-day operations, or if a pollution complaint or referral is received from the public or other agencies.

Table 1 – Guidance for Screening Results

Typical Parameters	
Parameter	Follow-up Threshold
pH	>9 or <6.5
Surfactants	>0.75 mg/L
<i>E. coli</i>	>1,000 cfu/100 mL or MPN/100 mL resampled up to two more times within 12 months
	>5,000 cfu/100 mL or MPN/100 mL for advanced investigations
Physical signs	unusual odor, color, clarity, floatables, deposits, stains, vegetation change, outfall structural damage
Additional Parameters	
Parameter	Follow-up Threshold
Ammonia	>1 mg/L
Conductivity	>1,000 uS/cm
Turbidity	>5 NTU
TDS	>500 mg/L
Dissolved oxygen	< 5 mg/L
Temperature	+5°F warm water stream +2°F cold water stream

IV. Process for Revision

Any questions on this procedure should be directed to the entity's Stormwater Manager. This procedure shall be reviewed once per permit cycle by the ADW Technical Committee.

Outfall ID:				Community:			
Section 1: BACKGROUND DATA							
Date:		Time:		Inspector:			
Weather: <input type="checkbox"/> 48 hrs no rain <input type="checkbox"/> Sunny <input type="checkbox"/> Cloudy <input type="checkbox"/> Partly Cloudy <input type="checkbox"/> Rainy <input type="checkbox"/> Winter Inspection							
Photos Taken:				Receiving Water:			
Nearest Property Address/Location Description:							
Land Use: <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Residential <input type="checkbox"/> Other _____							
Section 2: OUTLET DESCRIPTION							
Type/Shape/Size	Size (in) Width/Height or Diameter:						
	Type/Shape	<input type="checkbox"/> Round	<input type="checkbox"/> Arch	<input type="checkbox"/> Box	<input type="checkbox"/> Other _____		
	Material:	<input type="checkbox"/> RCP	<input type="checkbox"/> PVC	<input type="checkbox"/> CMP	<input type="checkbox"/> Concrete <input type="checkbox"/> Other _____		
Submerged	In Water:	<input type="checkbox"/> No	<input type="checkbox"/> Partially	<input type="checkbox"/> Fully			
	In Sediment:	<input type="checkbox"/> No	<input type="checkbox"/> Partially	<input type="checkbox"/> Fully			
Outfall Damage	<input type="checkbox"/> Yes	<input type="checkbox"/> Spalling/	<input type="checkbox"/> Corrosion	<input type="checkbox"/> Other _____			
	<input type="checkbox"/> No						
Deposits/Stains	<input type="checkbox"/> Yes	<input type="checkbox"/> Oily	<input type="checkbox"/> Flow Line	<input type="checkbox"/> Paint	<input type="checkbox"/> Other _____		
	<input type="checkbox"/> No						
Turbid/Cloudy Plunge Pool Below Outlet	<input type="checkbox"/> Yes	<input type="checkbox"/> Odors	<input type="checkbox"/> Floatables	<input type="checkbox"/> Color	<input type="checkbox"/> Other _____		
	<input type="checkbox"/> No	<input type="checkbox"/> Oil Sheen	<input type="checkbox"/> Suds	<input type="checkbox"/> Excessive Algae			
Flow Present?	<input type="checkbox"/> Yes	<input type="checkbox"/> Trickle	<input type="checkbox"/> Moderate	<input type="checkbox"/> Substantial			
	<input type="checkbox"/> No						
Section 3: PHYSICAL INDICATORS FOR OUTFALLS WITH WATER							
Odor of Water	<input type="checkbox"/> Sewage	<input type="checkbox"/> Sulfide	<input type="checkbox"/> Oil/Gas	<input type="checkbox"/> Other _____			
	<input type="checkbox"/> None	<input type="checkbox"/> Rancid/Sour					
Color of Water:	<input type="checkbox"/> Clear	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Dark Brown/ Tannic	<input type="checkbox"/> Muddy	<input type="checkbox"/> Other _____		
Floatables (not including trash)	<input type="checkbox"/> Paint	<input type="checkbox"/> Petroleum (oil sheen)	<input type="checkbox"/> Algae	<input type="checkbox"/> Other _____			
	<input type="checkbox"/> None	<input type="checkbox"/> Sewage	<input type="checkbox"/> Suds/bubbles				
Trash/debris	<input type="checkbox"/> Glass	<input type="checkbox"/> Yard Waste	<input type="checkbox"/> Paper	<input type="checkbox"/> Plastics			
	<input type="checkbox"/> None	<input type="checkbox"/> Mixed Material	<input type="checkbox"/> Metal	<input type="checkbox"/> Other _____			
Sample Obtained	<input type="checkbox"/> Yes	<input type="checkbox"/> No					
Section 4: PRIMARY SCREENING/SAMPLES COLLECTED							
Screening Parameters	Result	Possible Illicit Discharge?		Equipment			
pH		<input type="checkbox"/> Yes	<input type="checkbox"/> No				
Temperature (F)		<input type="checkbox"/> Yes	<input type="checkbox"/> No				
Conductivity (µS/cm)		<input type="checkbox"/> Yes	<input type="checkbox"/> No				
Ammonia (ppm)		<input type="checkbox"/> Yes	<input type="checkbox"/> No				
Detergents (ppm)		<input type="checkbox"/> Yes	<input type="checkbox"/> No				
Section 5: ILLICIT DISCHARGE POTENTIAL							
Do the screening results above indicate that an illicit discharge may be present?							
<input type="checkbox"/> Yes <input type="checkbox"/> No							
Section 6: NOTES							

STORMWATER DISCHARGE PERMIT APPLICATION



Corrective Action Notification Sample Letter

For the Alliance of Downriver Watersheds MS4s

Attachment F

NOTICE OF ILLEGAL DISCHARGE OR CONNECTION SAMPLE LETTER

<Person or Business Name>

<Address Line 1>

<Address Line 2>

Dear <Property Owner>:

The Michigan Department of Environmental Quality (MDEQ) Municipal Separate Storm Sewer System Permit requires the <CVT> to control the amount of pollutants entering the drainage system. This includes the detection and elimination of illegal discharges or connections to the system that may contain pollutants or are otherwise not allowed. Left uncorrected, any pollutants entering the system will ultimately impact nearby lakes or streams as storm drainage is not treated at any sort of treatment facility. Any discharge/connection without permission is illegal and requires immediate termination of the discharge.

An inspection of the drainage system has occurred in the vicinity of your property and an illegal connection/discharge was discovered entering into the <CVT> system. The discharge/connection was discovered on <date> at <business name and address>. <Description of indicators or source>.

This discharge directly pollutes the surface waters of the State of Michigan. This is a violation of the Federal Clean Water Act, PL 92-500, as amended, State of Michigan Natural Resources and Environmental Protect Act 451, Public Act of 1994, as amended, Part 31, and the Michigan Department of Environmental Quality NPDES Storm Water General Permit (MIG610000). Please contact me within 14 days to report plans for correction of the violation.

A follow-up investigation will be conducted to ensure compliance. If the illegal discharge/connection cannot be removed immediately, you do not understand this notice, or you disagree that an illegal discharge/connection exists at your property, please contact me with further details or explanation by calling <phone number> or via email at <email address>.

Sincerely,

<Name>

<Title>

STORMWATER DISCHARGE PERMIT APPLICATION



State and Federal Regulatory Mechanisms

For the Alliance of Downriver Watersheds MS4s

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
SARA Title III Section 304 40 CFR 355.40 (EHS & Hazardous Substances)	<p>Release of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or Extremely Hazardous Substance (EHS) (40 CFR 355, Appendix A) from a facility (all buildings, equipment, etc. located on a single site or adjacent sites owned or operated by the same person) at which a hazardous chemical (as defined under 29 CFR 1910.1200(c)) is used, produced or stored (including motor vehicles, rolling stock, and aircraft) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hr period that migrates beyond the facility boundaries.</p> <p>Includes continuous release reportable under CERCLA Section 103.</p> <p>Excludes release that is federally permitted or that results in exposure to persons solely within the boundaries of the facility. See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions.</p> <p>Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.</p> <p>Excludes release < 1000 lbs of NOx released to the air from combustion or combustion-related activities.</p>	<p>Immediate (within 15 minutes after discovery): to LEPC(s) of any area(s) potentially affected, and SERC (DEQ PEAS line accepts notification on behalf of SERC) by owner or operator.</p> <p>Continuous releases must be identified as such and are reported initially and when there is a significant change in the release.</p> <p>See 73 FR 76948 (12/18/08): Only CAFOs are required to report continuous releases to the air from animal waste.</p> <p>Transportation related releases can be reported to 911.</p>	<p>As soon as practicable (within 30 days) after release: to LEPC(s) and SERC.</p> <p>Not required for releases that occur during transportation or from storage incident to transportation.</p> <p>For continuous releases: Initial written within 30 days after initial telephone notification: to LEPC(s) and SERC.</p> <p>Michigan SARA Title III Program accepts reports on behalf of the SERC.</p>	<p>PEAS: 800-292-4706</p> <p>Contact your LEPC for a phone number to report releases.</p> <p>Call 911 if your LEPC is not active.</p> <p>For further information & LEPC contact information, contact Michigan SARA Title III Program 517-284-7272</p>
CERCLA Section 103 40 CFR 302 (Hazardous Substances)	<p>Release into the environment of a CERCLA hazardous substance (40 CFR 302, Table 302.4) or hazardous constituent in a mixture or solution (including hazardous waste streams) from a vessel or facility (any building, structure, etc. including motor vehicles, rolling stock, aircraft, pipe, pipeline, well, pond, lagoon, impoundment, ditch, landfill, or site where a hazardous substance has come to be located) in a quantity equal to or greater than its corresponding reportable quantity in any 24-hour period.</p> <p>Excludes petroleum, including oil, or any fraction thereof.</p> <p>See 40 CFR 302.6 for notification requirements for radionuclide releases.</p> <p>Includes continuous release: occurs without interruption or abatement or that is routine, anticipated, and intermittent and incidental to normal operations or treatment processes.</p> <p>See 67 FR 18899 (4/17/02) for guidance on the CERCLA federally permitted release definition for certain air emissions. See 71 FR 58525 (10/4/06) re Exemption for NOx releases to the air of < 1000 lbs from combustion or combustion-related activities.</p> <p>Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.</p>	<p>Immediate (within 15 minutes after discovery): to NRC by person in charge of vessel or offshore or onshore facility.</p> <p>Continuous releases must be identified as such and are reported initially and when there is a significant change in the release.</p> <p>See 73 FR 76948 (12/18/08) re Exemption from reporting continuous releases to the air from animal waste.</p>	<p>For continuous releases only: Initial written within 30 days after initial telephone notification & Follow-up within 30 days of first anniversary of initial written notification: to EPA Region 5.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact Michigan SARA Title III Program 517-284-7272 or EPA's Superfund, TRI, EPCRA, RMP, and Oil Information Center 800-424-9346</p>

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations. Additional reporting requirements** might be found in **permits, licenses, registrations, contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*				
Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 201, Environmental Remediation	<p>(i) Unpermitted release into the environment over a 24-hour period of a hazardous substance (<i>July 1, 2012, edition</i> of the CERCLA list, 40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity.</p> <p>Does not include release solely from UST systems regulated under Part 213, and release solely from disposal area licensed under Part 115 and discovered through disposal area's hydrogeological monitoring plan.</p> <p>Release of substance regulated by MI Dept of Agriculture & Rural Development (MDARD) (fertilizer, soil conditioner, or pesticide) excluding normal agricultural practices: <i>also</i> report to MDARD.</p>	<p>Within 24 hours after discovery: to DEQ-RRD district office (PEAS after hours)</p> <p>by owner or operator or person holding easement interest.</p> <p>Report agricultural release to MDARD.</p>	<p>Upon request: Provide a response activity plan to DEQ-RRD district supervisor.</p>	<p>PEAS: 800-292-4706</p> <p>MDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>For further information contact DEQ-RRD</p>
NREPA 1994 PA 451 Part 201, Environmental Remediation (Continued)	<p>(ii) The owner or operator has reason to believe that one or more hazardous substances are migrating or have migrated from his or her property and are present beyond the property boundary at a concentration in excess of cleanup criteria for unrestricted residential use.</p> <p>(iii) The release is a result of an activity that is subject to permitting under NREPA Part 615 and the owner or operator is not the owner of the surface property and the release results in hazardous substance concentrations in excess of cleanup criteria for unrestricted residential use.</p> <p>Hazardous substance means a hazardous substance defined in CERCLA (40 CFR 302), hazardous waste as defined in NREPA part 111, petroleum as defined in NREPA part 213, or any substance demonstrated to pose an unacceptable risk to public health, safety, welfare, or the environment.</p> <p>Cleanup criteria for unrestricted residential use means criteria that satisfy the requirements in section 20120a(1)(a) or (16); or as defined under NREPA part 213.</p>	<p>Within 30 days after discovery: to DEQ-RRD district office and owners of property to which hazardous substances migrated or owner of surface property by owner or operator of property where release occurred.</p> <p>Specific form required for: "Notice of Migration of Contamination" (Form EQP4482).</p>	<p>Upon request: Provide a response activity plan to DEQ-RRD district supervisor.</p>	<p>For further information contact DEQ-RRD</p> <p>MDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>PEAS: 800-292-4706</p> <p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact MDARD 517-284-5644</p>
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (Agricultural)	<p>Release to the environment of a commercial pesticide >5 gallons or 100 pounds.</p> <p>Reportable agricultural spills as defined in the provisions of SARA Title III section 304 and CERCLA section 103 shall be immediately reported to PEAS and the NRC.</p> <p>The term "release" excludes normal agricultural practices.</p>	<p>Immediate: to PEAS*</p> <p>Also notify NRC for spills reportable under SARA Title III & CERCLA.</p> <p>*MDARD prefers direct notification to their hotline. PEAS forwards all agriculture calls to MDARD.</p>	<p>Within 90 days: to MDARD Pesticide and Plant Pest Management Div. a revised site plan.</p>	<p>MDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>PEAS: 800-292-4706</p> <p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact MDARD 517-284-5644</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
<p>NREPA 1994 PA 451 Part 85, Fertilizers Regulation 641 Commercial Fertilizer Bulk Storage Regulation 642, On Farm Fertilizer Bulk Storage (Agricultural)</p>	<p>Release to the environment of a commercial fertilizer >55 gallons liquid or 650 pounds dry, or tank overfills; or an on farm fertilizer > 55 gallons liquid.</p> <p>For storage tank with bladder system instead of diking: also report all overfills and internal spills.</p> <p>The term "release" excludes normal agricultural practices. The term "liquid fertilizer" excludes anhydrous ammonia.</p>	<p>Immediate: to MIDARD by commercial bulk storage facility personnel (For farms, the regulation does not specify who makes the report.)</p>	<p>Not required.</p>	<p>MIDARD Agriculture Pollution Emergency Hotline: 800-405-0101</p> <p>For further information contact MIDARD 517-284-5644</p>
<p>Fire Prevention Code 1941 PA 207 Section 29.5g</p>	<p>A fire, explosion, spill, leak, accident, or related occurrence that involves the transportation, storage, handling, sale, use, or processing of hazardous material by a firm, person, or vehicle.</p> <p>Hazardous material = explosives, pyrotechnics, flammable gas, flammable compressed gas, flammable liquid, nonflammable compressed gas, combustible liquid, oxidizing material, poisonous gas or liquid, LPG, or irritating, etiologic, radioactive, or corrosive material.</p> <p>Act 207 amended 6/19/2006. The State Fire Marshall is in LARA, Bureau of Fire Services.</p>	<p>Immediately following incident, report known details regarding incident: to LARA Bureau of Fire Services and organized local fire department by owner of firm or vehicle or the person and the chief of first police or organized fire dept upon scene of incident.</p>	<p>Not required.</p>	<p>Contact LARA Bureau of Fire Services by calling the MSP HazMat hotline: 800-525-5555</p> <p>For further information: contact local fire department</p>
<p>Fire Prevention Code 1941 PA 207 Part 2 of Storage and Handling of Flammable and Combustible Liquids rules (FL/CL code)</p>	<p>A release from an AST system of > 55 gal of any flammable or combustible liquid (flash point < 200°F) to the ground or within a secondary containment area during any 24 hour period.</p> <p>Note: Many liquid pesticides are combustible (flash point between 100 and 200°F).</p>	<p>As soon as practicable after detection of release: to PEAS by owner or operator.</p>	<p>Within 10 days after release: to LARA Bureau of Fire Services, Storage Tank Division outlining cause, discovery, response to prevent recurrence.</p>	<p>PEAS: 800-292-4706</p> <p>For further information: contact LARA Bureau of Fire Services, Storage Tank Division 517-335-7211</p>

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. Releases might be reportable under multiple regulations. Additional reporting requirements might be found in permits, licenses, registrations, contingency and pollution prevention plans, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 171 (Transportation of Hazardous Materials)	<p>Initial verbal notice: Incident during transportation (including loading, unloading, temporary storage) involving (1) hazardous material and resulting in death, injury requiring hospitalization, public evacuation ≥ 1 hour, major transportation artery or facility closure ≥ 1 hour, or flight pattern alteration; (2) fire, breakage, spillage, or suspected radioactive contamination occurs involving a radioactive material; (3) fire, breakage, spillage or suspected contamination involving an infectious substance other than a regulated medical waste; (4) marine pollutant release exceeding 450 L (119 gal) liquid or 400 kg (882 lbs) solid; (5) other per judgment of person in possession of the hazardous material (e.g., continuing danger to life exists at scene of incident); (6) during transportation by aircraft, a fire, violent rupture, explosion or dangerous evolution of heat occurs as a direct result of a battery or battery-powered device.</p> <p>Hazardous material = CERCLA hazardous substance (40 CFR 302, Table 302.4), hazardous waste (40 CFR 262), marine pollutant (49 CFR 172.101 Appendix B), elevated temperature material, listed on Hazardous Materials Table (49 CFR 172.101), or meets criteria for hazard class/division in 49 CFR 173.</p> <p>Written follow-up report: Required for all of above, plus any unintentional release of hazardous material from a package (including tank); or any quantity of hazardous waste discharged during transportation; or structural damage to lading retention system, even if no release, on specification cargo tank with ≥ 1000 gal capacity containing hazardous material; or undeclared hazardous material discovered.</p>	<p>As soon as practical but no later than 12 hours after occurrence of the incident: to NRC by each person in physical possession of the hazardous material.</p> <p>(A reportable incident <i>must</i> be reported by telephone, not online.)</p> <p>For infectious substances, notice may be given to the Director, Centers for Disease Control and Prevention, U.S. Public Health Service instead of NRC.</p>	<p>Within 30 days after discovery: to US DOT on DOT Form F 5800.1 (01-2004) "Hazardous Materials Incident Report."</p> <p>Report online at https://hazmatonline.phmsa.dot.gov/incident/</p> <p>Report must be updated w/i 1 year of incident if: Death results from injury; hazardous material or package info on prior report misidentified; damage, loss or cost not known on prior report becomes known or changes by \$25,000 or 10%.</p> <p>See regulation for exceptions to written report.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>U.S. Public Health Service 800-232-0124</p> <p>For further information contact US DOT Hazardous Materials Information Center at 800-467-4922 or online at www.phmsa.dot.gov/hazmat</p>
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to surface of ground, surface water, groundwater or public sewer system)	<p>Unpermitted release directly or indirectly to public sewer system, surface of ground, surface water or groundwater from an oil storage facility or on-land facility of a "polluting material" (oil, salt, or any material specified in table 1 in R 324.2009) in excess of its threshold reporting quantity during any 24-hour period.</p> <p>See Part 5 rules, effective 8/31/01, for details and exemptions. HB 5586 effective 6/15/04 amended the reporting requirements.</p> <p><i>Rule revisions pending as of April 2014.</i></p>	<p>As soon as practicable after detection: to PEAS <i>and</i> 911 by owner, operator or manager.</p> <p>State agencies call 911 if release reported to them by another state or Canada.</p>	<p>Within 10 days after release: to DEQ-WRD district supervisor <i>and</i> to the local health department where the release occurred, outlining cause, discovery, response & prevention of recurrence.</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-WRD</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
<p>CWA Section 311 33 CFR 153 (Navigable waters – Coast Guard/DOT) Control of Pollution by Oil and Hazardous Substances, Discharge Removal</p>	<p>Discharge of a harmful quantity of oil or a hazardous substance from a vessel or onshore or offshore facility into or upon navigable waters of the United States or adjoining shorelines.</p> <p>Harmful quantity = oil discharge that violates applicable water quality standards, or causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or a CERCLA hazardous substance (40 CFR 302, Table 302.4) in a quantity equal to or greater than its corresponding reportable quantity.</p> <p>Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.</p>	<p>Immediate: to NRC by person in charge of vessel or facility.</p> <p>If direct reporting to NRC not practicable, may report to district Coast Guard or EPA pre-designated OSC.</p>	<p>Not required.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>District 9 Coast Guard 216-902-6117</p> <p>EPA Region 5 for pre-designated OSC 312-353-2318</p> <p>For further information contact EPA Region 5 at 312-353-8200 or District 9 Coast Guard at 216-902-6045</p>
<p>CWA Section 311 40 CFR 110 (Discharge of Oil)</p>	<p>Discharges of oil that violate applicable water quality standards, or cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.</p> <p>Oil = oil of any kind or in any form including petroleum, crude oil, petroleum refined products, sludge, oil refuse, oil mixed with wastes, etc., as well as vegetable and animal oils.</p>	<p>Immediate: to NRC by person in charge of vessel or facility.</p>	<p>Not required.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact DEQ-WRD</p>
<p>NREPA 1994 PA 451 Part 31, Water Resources Protection (Sewer Systems)</p>	<p>Discharge of untreated sewage or partially treated sewage from a sewer system onto land or into the waters of the state.</p> <p>“Sewer system” means a sewer system designed and used to convey sanitary sewage or storm water, or both.</p>	<p>Immediate (within 24 hours): to DEQ-ODWMA district office (PEAS after hours); Local health depts.; Daily newspaper circulated in source & affected counties; & Affected municipalities.</p>	<p>At end of discharge: to same parties notified initially on Form EQP 5857 (Rev. 12/2011) “Report of Discharges of Untreated or Partially Treated Sewage.” Includes results of E. coli testing.</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-ODWMA</p>
<p>NREPA 1994 PA 451 Part 41, Sewerage Systems</p>	<p>Discharges of pollutants from sewerage systems (which can include combined sewers) in excess of those authorized by a discharge permit issued by the DEQ to surface water or groundwater as a result of a facility breakdown or emergency.</p> <p>Sewerage systems handle sanitary sewage or other industrial liquid wastes.</p>	<p>Promptly: to DEQ-ODWMA district office (PEAS after hours) by owner.</p>	<p>Within 72 hours: to DEQ-ODWMA district supervisor, outlining cause, discovery, corrective actions taken to minimize impact, restore operations, and eliminate future unpermitted discharges.</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-ODWMA</p>

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations.** **Additional reporting requirements** might be found in **permits**, licenses, registrations, **contingency and pollution prevention plans**, and local ordinances.



Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
<p>NREPA 1994 PA 451 Part 211, Underground Storage Tanks Part 213, Leaking Underground Storage Tanks</p>	<p>Releases of a regulated substance of any amount from underground storage tank (UST) systems (includes the emergency shutoff valve on down) subject to registration; overfill from UST fillpipe or vent onto ground; release from aboveground pipe attached to UST system.</p> <p>Regulated substance = petroleum or CERCLA hazardous substance (40 CFR 302, Table 302.4) or substance listed in CAA title 1 part A sect 112. Petroleum includes, but is not limited to, crude oil, motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents.</p>	<p>(Part 211) Within 24 hours after discovery: to LARA Bureau of Fire Services, Storage Tank Division by email, or fax on Form EQP 3826 (Rev. 4/12) If free product, Form EQP 3800 (Rev. 02/2003) required by UST owner or operator, or employee of owner or operator. Includes releases discovered years after UST system removed</p>	<p>(Part 213) At 180 days Initial Assessment Report on Form EQP3841 (Rev. 02/2003) if not closed; at 365 days Final Assessment Report on Form EQP3842 (Rev. 11/2006) if still not closed; at closure Closure Report on Form EQP3843 (Rev. 02/2003) to DEQ-RRD district project manager.</p>	<p>Email: deq-std-tanks@michigan.gov Fax: 517-335-2245</p> <p>For further information contact DEQ-RRD or phone 800-MICHUST</p>
<p>NREPA 1994 PA 451 Part 111, Hazardous Waste Management (Generators; Treatment, Storage & Disposal Facilities (TSDF); Transporters)</p>	<p>Any amount of characteristic hazardous waste or listed hazardous waste (as defined in R 299.9203 "Hazardous Waste Rule 203") reaches the surface water or groundwater,</p> <p>A fire, explosion, or other release of hazardous waste or hazardous waste constituent occurs that could threaten human health or the environment.</p> <p>A release of > 1lb (or ≤ 1lb if not immediately cleaned up) hazardous waste to the environment from a tank system or associated secondary containment system.</p> <p>Additional hazardous waste reporting requirements under NREPA Part 201 and CERCLA.</p> <p>NREPA Part 111 requires transporters to comply with 49 CFR 171 and 33 CFR 153.</p>	<p>Immediate: to PEAS (or for Tank systems/secondary containment, within 24 hours of discovery: to DEQ-OWMRP) and to NRC if threat to human health or environment outside facility by generator, or owner or operator of TSDF, or transporter.</p>	<p>For large quantity generators and TSDF: Within 15 days after incident IF the contingency plan had to be implemented: to DEQ-OWMRP.</p> <p>For tank/secondary containment systems: Within 30 days of discovery: to DEQ-OWMRP.</p> <p>For transporters: to US DOT if required per 49 CFR 171.</p>	<p>PEAS: 800-292-4706</p> <p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact DEQ-OWMRP</p>
<p>NREPA 1994 PA 451 Part 121, Liquid Industrial Waste</p>	<p>The liquid industrial waste spill could threaten public health, safety, welfare, or the environment, or has reached surface water or groundwater.</p> <p>Liquid industrial waste includes nonhazardous brine, by-product, industrial wastewater, leachate, off-spec commercial chemical product, sludge, sanitary or storm sewer clean-out residue, grease trap clean-out residue, spill residue, used oil, or other liquid waste not regulated by other laws.</p>	<p>Immediate: to PEAS and local authorities by generator, transporter, or owner or operator of facility. Refer to MCL 324.12111(1) for required report elements</p>	<p>Prepare within 30 days after incident. Submit upon request: to DEQ-OWMRP district supervisor.</p> <p>Refer to MCL 324.12111(1) for required report elements</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-OWMRP</p>
<p>NREPA 1994 PA 451 Part 55, Air Pollution Control</p>	<p>Abnormal condition, start-up, shutdown, or malfunction that results in emissions exceeding permissible (in rule, permit or order) levels of hazardous air pollutants (HAPs) (CAA Sect. 112(b)) or toxic air contaminants (as specified in permit) for > 1 hour, or any air contaminant for > 2 hours.</p> <p>Written follow-up report only required for emission exceedences lasting > 2 hours.</p>	<p>As soon as possible, but not later than 2 business days after discovery: to DEQ-AQD district office (PEAS after hours) by owner or operator.</p>	<p>Within 10 days after start-up, shutdown, or abnormal condition, malfunction corrected. Or within 30 days of abnormal condition, malfunction discovery- whichever first: to DEQ-AQD district supervisor.</p>	<p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-AQD</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
NREPA 1994 PA 451 Part 55, Air Pollution Control (Permit to Install Exemptions)	Emergency venting of natural gas from transmission and distributions systems or field gas from gathering lines in amounts > 1,000,000 standard cubic feet per event. Emergency = unforeseen event that disrupts normal operating conditions and poses a threat to human life, health, property or the environment if not controlled immediately. See R 336.1285(mm), effective 6/20/2008, for details.	Within 24 hours of the event: to PEAS by owner or operator.	Not required.	PEAS: 800-292-4706 For further information contact DEQ-AQD
Public Health Code 1978 PA 368 Part 133, Dry Cleaning	Condition or incident presents a threat or hazard to public health or safety.	Immediate: to DEQ-AQD district office (PEAS after hours) by owner or operator.	Within 30 days after incident: To DEQ-AQD district supervisor.	PEAS: 800-292-4706 For further information contact DEQ-AQD
NREPA 1994 PA 451 Part 615, Supervisor of Wells (oil and gas production fields)	A loss, spill or release of (1) any amount of brine , crude oil , or oil or gas field waste unless it is less than 42 gallons and occurs while an authorized representative is on site and is completely contained and cleaned up within 1 hour, or (2) any unpermitted amount of natural gas , or (3) chemicals used in association with oil and gas activities.	Within 8 hours after discovery of: 42 gallons or more of brine, crude oil, or oil or gas field waste, or any amount of chemical or natural gas, or; less than 42 gallons if the spill contacts surface water, groundwater, or other environmentally sensitive resources, or is not completely contained and cleaned up within 48 hours: to DEQ-OOGM district office (PEAS after hours) by permittee.	Within 10 days after discovery of loss or spill: to DEQ-OOGM district supervisor on Form EQP-7233 (Rev 1/2012) "Report of Loss or Spill." by permittee Written report only for less than 42 gallons of brine, crude oil, or oil and gas field waste if spill does not contact surface water, groundwater, or other environmentally sensitive resources, and is completely contained and cleaned up within 48 hours.	PEAS: 800-292-4706 For further information contact DEQ-OOGM
49 CFR 191 Transportation of Natural and Other Gas by Pipeline	An incident, meaning: (1) Event that involves a release of gas from a pipeline, or of liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility that results in: Death or hospitalization; or Property damage ≥ \$50,000; or estimated gas loss of ≥ three million cubic feet. (2) Event that results in emergency shutdown of LNG facility. (3) Significant event per operator. Written Incident reports not required for LNG facilities. Applies to pipeline systems and the transportation of gas through those systems in or affecting interstate or foreign commerce. (See 49 CFR 191.3 for details.)	Earliest practicable moment following discovery: to NRC by operator. Notification must be electronic unless there is a safety-related condition to report.	As soon as practicable, and within 30 days after discovery: to US DOT. on DOT Form PHMSA F 7100.1 "Incident Report – Gas Distribution System." or PHMSA F 7100.2 "Incident Report – Gas Transmission and Gathering Systems" or PHMSA F 7100.3 "Incident Report – Liquefied Natural Gas (LNG) Facilities" Supplemental report filed as necessary as soon as practicable.	NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

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Release Notification Requirements in Michigan*

Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
49 CFR 195 Transportation of Hazardous Liquids by Pipeline	<p>Release of hazardous liquid (petroleum, petroleum products, or anhydrous ammonia) or carbon dioxide from a pipeline system that results in any of the following: (a) Explosion or fire; (b) Release of ≥ 5 gallons (except if < 5 barrels released due to maintenance and release not otherwise reportable, confined to property, does not pollute water, and cleaned up promptly); (c) Death of any person; (d) Injury requiring hospitalization; or (e) Property damage > \$50,000. (See 49 CFR 195.50, revised 1/8/02, for details)</p> <p>Applies to pipeline facilities and the transportation of hazardous liquids associated with those facilities in or affecting interstate or foreign commerce. (See 49 CFR 195.1 for details.)</p> <p>For any emergency. Or for incident involving naturally occurring or accelerator produced radioactive material- Immediate notice if:</p> <p>Incident may have caused or threatens to cause: dose to body 25 rems, to skin 150 rems, to extremities 375 rems (per rule 247); 24 hour concentration exceeds 5000 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 week, or property damage >\$100,000.</p> <p>Notice within 24 hours if:</p> <p>Incident may have caused or threatens to cause: dose to body 5 rems, to skin 30 rems, to extremities 75 rems (per rule 247); 24 hour concentration exceeds 500 times limits specified in table II of rules 261 to 269; contamination causes operation shut down for 1 day, or property damage >\$1000.</p>	<p>Earliest practicable moment following discovery:</p> <p>to NRC by operator if</p> <p>Release caused: Death or hospitalization; Fire or explosion; Property damage; Water pollution; or was Significant per the operator.</p>	<p>As soon as practicable, and within 30 days after discovery: to US DOT on DOT Form PHMSA F 7000-1 "Accident Report – Hazardous Liquid Pipeline Systems"</p> <p>Supplemental report must be filed within 30 days after operator receives changes or additions to original report.</p>	<p>NRC 800-424-8802 or online at www.nrc.uscg.mil</p> <p>For further information contact US DOT Pipeline Safety Information Center at 202-366-4595 or online at http://ops.dot.gov</p> <p>DEQ-OWMRP Radiological Protection Section 517-284-5185</p> <p>MSP Operations Div 517-241-8000</p> <p>PEAS: 800-292-4706</p> <p>For further information contact DEQ-OWMRP Radiological Protection Section</p>
1978 PA 368 Part 135, Radiation Control	<p>For incident involving source, by-product, or special nuclear radioactive material- Immediate notice if:</p> <p>Event that may have caused or threatens to cause: effective dose equivalent to individual 25 rems, lens dose equivalent 75 rems, shallow-dose equivalent to skin or extremities 250 rads; individual could receive 5 times annual limit on intake in 24 hours. OR</p> <p>Any lost, stolen, or missing licensed material in an aggregate quantity equal to or greater than 1000 times the quantity specified in appendix C to part 20 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas.</p> <p>Notice within 24 hours if:</p> <p>Event that may have caused or threatens to cause: an individual in 24 hours to receive effective dose equivalent >5 rems, lens dose equivalent >15 rems, shallow-dose equivalent to skin or extremities >50 rems; individual could receive >1 times annual limit on intake in 24 hours.</p>	<p>Immediate or within 24 hours (see reporting criteria): to USNRC by licensee or registrant.</p> <p>MSP Operations Division for all Power Plant related incidents (day or night) by licensee or registrant.</p>	<p>Within 30 days after release: to DEQ-OWMRP Radiological Protection Section by licensee or registrant.</p> <p>Written report also required if level of radiation or concentration of radioactive material in unrestricted area >10 times any applicable limit.</p> <p>See Rule 250 (R 325.5250) for required report content.</p>	<p>US Nuclear Regulatory Commission (USNRC): 301-816-5100</p> <p>Report content specified in 10 CFR 20.2003</p> <p>Written report also required for occurrences as specified in 10 CFR 20 Section 20.2203 and after the occurrence of any lost, stolen, or missing licensed material becomes known to the licensee, and if at the time the report is filed all licensed material in a quantity greater than 10 times the quantity specified in appendix C to part 20 is still missing.</p> <p>For further information contact DEQ-OWMRP Radiological Protection Section 517-284-5185</p>
MIOSHA 1974 PA 154 Section 61, Records & Reports; Notice of Fatalities or Hospitalization	Any release that results in one death or the hospitalization of 3 or more persons.	Within 8 hours: to MIOSHA Hotline.	Not required.	<p>MIOSHA Fatality or Catastrophe Hotline 800-858-0397</p> <p>For further information contact LARA-MIOSHA 517-322-1831</p>

SECTION ONE: Environmental Regulations

Release Notification Requirements in Michigan*				
Act & Regulation	Reporting Criteria	Initial Notification	Written Follow-up Report	Notes
TSCA 40 CFR 761.125 (PCBs)	Spills of PCBs at concentrations of 50 ppm or more and subject to decontamination requirements under TSCA that: contaminate surface water, sewers, drinking water supplies, grazing lands or vegetable gardens, or exceed 10 pounds. (TSCA specifies that these requirements are in addition to any under CWA or CERCLA. e.g. CERCLA requires spills of 1 pound or more to be reported to NRC.)	As soon as possible after discovery, and within 24 hours: to EPA Region 5.	Not required to be submitted. Records of cleanup and certification of decontamination shall be documented.	EPA Region 5 Corrective Action Section 312-886-7890 For further information contact EPA Region 5 Corrective Action Section
SARA Title III Section 313 40 CFR 372 (Toxic chemical release reporting)	Covered facilities as defined in 40 CFR 372 subpart B are subject to toxic chemical release reporting for toxic chemicals and chemical categories listed in 40 CFR 372 subpart D.	Not applicable.	Annually by July 1: to EPA & SERC on EPA's Form R "Toxic Chemical Release Inventory Reporting Form" (EPA Form 9350-1, Rev.10/2011) Report aggregate releases (permitted & unpermitted)	Michigan SARA Title III Program accepts reports on behalf of SERC For further information contact Michigan SARA Title III Program 517-284-7272

Acronyms used in table:

AQD = Air Quality Division	HazMat = Hazardous Materials	PA = Public Act (Michigan)
AST = Above Ground Storage Tank	HB = House Bill	PCB = Polychlorinated biphenyl
CAA = Clean Air Act	LARA = Michigan Department of Licensing & Regulatory Affairs	PEAS = Pollution Emergency Alerting System
CAFO = Concentrated Animal Feeding Operation	LEPC = Local Emergency Planning Committee	PHMSA = Pipeline & Hazardous Materials Safety Administration
CERCLA = Comprehensive Environmental Response, Compensation and Liability Act of 1980	LNG = Liquefied Natural Gas	RMP = Risk Management Program
CFR = Code of Federal Regulations	LPG = Liquefied Petroleum Gas	RRD = Remediation and Redevelopment Division
CWA = Clean Water Act	MCL = Michigan Compiled Laws	SARA = Superfund Amendments and Reauthorization Act of 1986
DEQ = Michigan Department of Environmental Quality	MDARD = Michigan Department of Agriculture & Rural Development	SERC = State Emergency Response Commission
DOT = Department of Transportation	MIOSHA = Michigan Occupational Safety and Health Administration	TRI = Toxic Chemical Release Inventory
EHS = Extremely Hazardous Substance	MSP = Michigan Department of State Police	TSCA = Toxic Substance Control Act
EPA = U. S. Environmental Protection Agency	NRC = National Response Center (U.S. Coast Guard)	TSDF = Treatment, Storage & Disposal Facility
EPCRA = Emergency Planning & Community Right-to-Know Act	NREPA = Natural Resources & Environmental Protection Act	US DOT = U. S. Department of Transportation
FIFRA = Federal Insecticide, Fungicide, & Rodenticide Act	ODWMA = Office of Drinking Water & Municipal Assistance	USNRC = U. S. Nuclear Regulatory Commission
FL/CL = Flammable and combustible liquids	OOGM = Office of Oil, Gas, and Minerals	
FR = Federal Register	OPS = Office of Pipeline Safety (US DOT)	
HAP = Hazardous Air Pollutant	OSC = On Scene Coordinator	
	OWMRP = Office of Waste Management & Radiological Protection	

NOTE: If the release is a **THREAT TO HUMAN HEALTH or SAFETY**, call 911 or your local fire department.

*This table covers only those reporting requirements found in rules and regulations that apply in Michigan. **Releases might be reportable under multiple regulations. Additional reporting requirements** might be found in **permits, licenses, registrations, contingency and pollution prevention plans**, and local ordinances.



ATTACHMENT 4

PROCEDURE FOR RESPONDING TO ILLEGAL DUMPING/SPILLS

PROCEDURE FOR RESPONDING TO ILLEGAL DUMPING/SPILLS



Warren C. Evans
Wayne County Executive

CHARTER COUNTY OF WAYNE
C/O DEPARTMENT OF PUBLIC SERVICES
WATER QUALITY MANAGEMENT DIVISION
400 MONROE, SUITE 400
DETROIT, MI 48226

AUGUST 2019

POLICY

This policy establishes procedures and/or outlines the programs for responding to illegal dumping and spills by the Wayne County municipal separate storm sewer system operating divisions. These divisions are within the Wayne County Department of Public Services (WCDPS) and include the divisions of Water Quality Management, Land Resources Management, Facilities Management (Drains), Roads and Parks.

I. BACKGROUND

In compliance with the application requirements for a National Pollutant Discharge Elimination System (NPDES) Permit for Discharge of Storm water to Surface Waters of the State from a Municipal Separate Storm Sewer System (MS4), WCDPS responds to complaints and agency referrals involving illegal dumping, illicit and/or suspicious discharges and spills that may impact the County properties, right of ways, easements and the County's MS4. WCDPS also has proactive programs that are implemented to clean up and/or prevent the incidents of illegal dumping. These include the County Lending Environmental Assistance to Neighborhoods (CLEAN) program and the annual Household Hazardous Waste (HHW) Collection program which are both managed by the Land Resources Management Division (LRMD).

II. RESPONSE TO COMPLAINTS AND AGENCY REFERRALS

The WCDPS operating divisions have multiple ways to respond to complaints and/or other agency referrals regarding illegal dumping and spills as described below.

A. WATER QUALITY MANAGEMENT DIVISION

Jointly with the LRMD and the Facilities Management Division (FMD) the Water Quality Management Division (WQMD) operates an environmental hotline number 1-888-223-2363. The hotline is operated 24 hours per day seven days a week, to log and coordinate responses to environmental concerns including illegal dumping and spills. Telephone operators are trained and given operator guideline materials for referring callers to the appropriate internal and external staff for response (see Attachment 1). WQMD staff will respond to illegal dumping complaints, or spills, which are non-hazardous in nature and are likely to result in an illicit discharge to the County's MS4 or surface waters according to the division's complaint response standard operating procedure (see Attachment 2). Response is typically within 24 hours or next business day. Follow up field screening and source investigations are carried out on a case by case basis depending on the severity of the situation and/or the existence of trace material to use for source tracking.

B. LAND RESOURCES MANAGEMENT DIVISION

As describe above (II.A) the LRMD jointly operates an environmental hotline number 1-888-223-2363. The LRMD will respond to illegal dumping complaints regarding solid waste issues including tires throughout the County according to the division's complaint response standard operating procedure (see Attachment 3). Response is typically within 24 hours or next business day. Follow up field screening and source investigations are carried out on a case by case basis depending on the severity of the situation and/or the existence of trace material to use for responsible party identification.

C. COUNTY DRAINS – FACILITIES MANAGEMENT DIVISION

As describe above (II.A) the FMD - Drains jointly operates an environmental hotline number 1-888-223-2363 with the WQMD and LRMD. The FMD will respond to illegal dumping and spill complaints that impact Wayne County designated drains according to the division's complaint response standard operating procedure (see Attachment 4). Response is typically within 24 hours or next business day. Follow up field screening and source investigations are carried out on a case by case basis depending on the severity of the situation and/or the existence of trace material to use for responsible party identification.

D. COUNTY ROADS

Wayne County Roads Division operates a 24 hour hotline (1-888-Road Crew) to report road hazards. There is also an online electronic form that can be completed on the County websites at <http://www.waynecounty.com/dps/1918.htm>. Through the hotline or online form people are encouraged to and have the means for reporting oil/fuel spills, dead animals, debris in roadway as well as other and miscellaneous issues. As a result Roads Division maintenance staff are routinely responding to and cleaning up litter and piles of illegally dumped materials in order to keep the roadways safe and prevent these materials from entering into the County's storm sewer system or surface waters. If not immediate, response is typically within 24 hours or the next business day depending on the severity of the issue. Whenever possible/feasible/appropriate, evidence is turned over to the Wayne County Sheriff's Office to pursue identification and prosecution of responsible party.

E. COUNTY PARKS

The Wayne County DPS Parks Division manages all Wayne County parks properties. This includes routinely responding to park user complaints and staff referrals of illegal dumping or spills (see Attachment 6). Complaints are received either directly at the Wayne County Parks Administrative Office (734-261-1990) or via the environmental or road crew hotlines. If not immediate, response is typically within 24 hours or the next business day depending on the severity of the issue. Whenever possible/feasible/appropriate, evidence is turned over to the Wayne County Sheriff's Office to pursue identification and prosecution of responsible party.

III. REPORTING DISCHARGES TO WATERS OF THE STATE

If upon investigation it is determined that polluting materials coming from the County's MS4 are being released to the surface or ground waters of the state, staff are to call the EGLE Southeast Michigan District Office at (586) 753-3775 during normal business hours. After hours, or if no one is available at the EGLE District Office staff should call the PEAS Hotline at (800) 292-4706. Significant petroleum or hazardous material spills are to also be reported to the National Response Center at (800) 424-8802.

IV. OTHER

Any questions on this policy and procedure should be directed to the Wayne County Storm Water Program Manager.

Pollution Incident Prevention Plans (PIPPs) exist for each of the WCDPS Roads Division Yards and include site specific spill response procedures. The site specific Pollution Prevention Action

Plans (i.e. SOPs) prepared for the County's high potential for pollutant runoff facilities also contain site specific spill response procedures (see WC MS4 Application - Appendix G).

V. PROCESS FOR UPDATING/REVISING THIS PROCEDURE

This procedure shall be reviewed at least once during the permit cycle by the Wayne County Storm Water Program Manager for any updates or to improve the procedures.

ATTACHMENTS

Attachment 4.1	Environmental Hotline Operator Guidance Materials
Attachment 4.2	Water Quality Management Division Complaint Response Standard Operating Procedures
Attachment 4.3	Land Resources Management Division Complaint Response Standard Operating Procedures
Attachment 4.4	Facilities Management Division – Drain Operations Complaint Response Standard Operating Procedures
Attachment 4.5	Roads Division Complaint Response Standard Operating Procedures
Attachment 4.6	Parks Division Complaint Response Standard Operating Procedures



Signus Communications Operator Guidelines

These guidelines include examples of calls that may occur and the appropriate referrals to be made.

- ⇒ **Callers with life-threatening emergencies** should be told to contact 911 for their local Police, and/or Fire Department so that the appropriate agencies in their area can handle those situations.
- ⇒ **Callers with fuel/oil/ hazardous material spills** should be told to contact 911 for their local Police, and/or Fire Department. For fuel/oil/hazardous material spills the Signus Operator may also provide the caller with the Michigan Department of Environmental Quality (MDEQ) Pollution Emergency Alert System call number: **800-292-4704** and the National Response Center call number: **(800) 292-8802**.
- ⇒ **ONLY Callers with “after hour” complaints of odors from either the Downriver Wastewater Treatment Facility or a landfill located in Wayne County** should have their information taken and forwarded immediately to the Downriver Wastewater Treatment Facility at **(313) 213-5107**.
- ⇒ **Callers with ALL other Wayne County, Michigan environmental questions, concerns and environmental complaints** should have their question/concern/complaint information taken and passed on to the Wayne County Department of Public Services Land Resources and Water Quality Management Division offices via Fax at (734) 326-4421.

PROCEDURES AND RESPONSIBILITIES

The 888# will be forwarded to ring at the location of Signus Communications answering service after 4:30 p.m. Eastern Standard Time (M-F) and remain under Signus Communications responsibility all day Saturday, Sunday, and holidays. After 4:30 p.m. M- F, Signus Communications will be responsible for obtaining the information required from the caller for all incoming calls.

Signus Communications will fax a copy of all incoming calls with complaint information and/or Rouge River as well as other Wayne County environmental related inquiries to the Wayne County Department of Public Services fax number at (734) 326-4421. Please fax the next following day no later than 8:30 a.m. EST., including Saturdays, Sundays and holidays.

In the event the incoming call requires immediate attention (ONLY Callers with “after hour” complaints of odors from either the Downriver Wastewater Treatment Facility or a landfill located in Wayne County) the Signus Communications operator should **call the Land Resource Management Division at 313-999-6267**. Please be advised that under no circumstance(s) should the **(313) 999-6267** number be given out to the caller(s). **Do not forward any calls between the hours of 10:00 p.m. ET and 8:00 a.m.,** simply fax the information over to us prior to the next business day.

Should you have any additional questions, please feel free to contact Mr. Patrick Cullen at (734) 326-4437.

Appendix E - Attachment 4.2

Wayne County Department of Public Services Water Quality Management Division

Complaint Response Standard Operating Procedure

- 1) Non-emergency incoming complaints or referrals received by the Wayne County Department of Public Services (WCDPS) Water Quality Management Division (WQMD) are reviewed by one of the Department Managers (currently Noel Mullett or Andra Mealey) to evaluate the nature of the complaint. If the nature of the complaint is within the purview of the Division, the Division will initiate an investigation. If the complaint is not in this Division's purview or jurisdiction, it will be referred to the appropriate agency or jurisdiction at the time the complaint is received.
- 2) Complaints/referrals within the Division's purview are forwarded from a Department Manager (DM) to an available WQMD field staff member who will investigate the complaint immediately if instructed to do so, or as soon as practically possible (typically within 24 hours or next business day depending on the nature of the complaint). If there is no field staff available, and the complaint is urgent, one of the DMs will investigate.
- 3) The investigating personnel will determine the magnitude/severity of the complaint based on site conditions. If the situation is an immediate environmental, fire, or public health hazard the response will follow the Immediate Hazard Standard Operating Procedure (attached below).

If the situation is not an immediate hazard, the complaint will be investigated and resolved as expeditiously as possible consistent with the Pollution Complaint Response procedure described in the ARC's Collaborative IDEP.

If the situation is a release of any polluting material from the County's MS4 to the surface or ground waters 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) staff are to call the EGLE Southeast Michigan District Office at (586) 753-3794 during normal business hours. After hours staff will call the PEAS Hotline at 1-800-292-4706.

- 4) WQMD complaint documentation and tracking begins via the incoming call (or email) and records the field staff assignment and all other pertinent communications leading to resolution and/or closure of the investigation. Information consistent with the Pollution Complaint Tracking Form located in the ARC's Collaborative IDEP is entered into the WQMD Complaint Database. A hard copy of the complaint report, hotline forms, fax forms, photos, notes, etc., are logged-in and filed in the "complaint" binder as well as on the server at G:\watrshed\Complaints.
- 5) The complainant will be apprised of the complaint disposition as soon as possible at the conclusion of the investigation. If the complaint remains unresolved after a 48-hour period, the complainant will be contacted and informed of the status.
- 6) These procedures will be followed across the entire Wayne County MS4 area.

Immediate Hazard Standard Operating Procedure

If an immediate hazard/major spill is identified by staff, call the following, in this order.

Local Community

Community Public Safety Department	From site call 911
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Internal Wayne County Contacts

Wayne County Emergency Management*	(734) 728-3711
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* Responsible for notifying Chief Executive Office and County Press Officer, as appropriate

Contact **one** of the following individuals, this person will be known as the **Incident Office Coordinator** who will contact the remainder of the list as appropriate.

WC Drain Commissioner Facilities Management Division Elmeka Steele	(313) 224-8116
Land Resources Management Division Patrick Cullen	(734) 326-4437
Wayne Co. Corporation Counsel Stephen Campbell	(313) 224-6822
Parks Division Alicia Bradford	(734) 261-2022
Roads Division William Bantom	(734) 955-2290
WCDPS - Administration Beverly Watts	(313) 224-7764

External Contacts

<u>During business hours(speak to someone)</u> EGLE Southeast MI – Warren Office	(586) 753-3794
<u>No Answer or after hours:</u> PEAS (pollution emergency alert system)	(800) 292-4706
National Response Center	(800) 424-8802

Intra-County Referrals

Reports of illicit discharges or environmentally related complaints that are received from other Wayne County divisions, are considered an IDEP Referral complaint. The investigation procedure follows the Complaint Standard Operating Procedure (SOP). All IDEP Referral complaints are entered into the IDEP complaint database. Each one is flagged for the purpose of monitoring intra-County referrals. The intra-County referral complaint reports/forms, field notes, photos, etc., are filed in the “Intra-County Complaint” binder.

WQMD Complaint/Issue Referral to External Agencies Standard Operating Procedure

- 1) Complaint and IDEP referrals depend on jurisdiction, type of complaint, and its severity. This is to be determined by WQMD management and staff based upon the details known about the complaint situation.
- 2) Type of the typical complaints received by WQMD: fish kill, discoloration, petroleum, foaming, odor, debris, sewage, dye release, other chemicals. See Complaint Referrals & Contacts chart (attached).
- 3) Referral agencies include: Wayne County Facility Management Division (Drains), Wayne County Emergency Management, EGLE-WRD, MDNR-Fisheries, PEAS 24 hour hotline, National Response Center (NRC), Community Department of Public Works (DPW), and Community Fire Departments.
- 4) Wayne County Facilities Management Division (Drains) will be notified of any complaint concerning a Wayne County Drain.

Complaint Referrals & Contacts

Wayne County Department of Public Services receives a variety of environment related calls. The frequent items and agencies that should receive notification of issues are identified below along with contact information for the various agencies:

Fish Kills	2, 5, 6, 9
Discoloration	1*, 3*, 4*, 5*, 6*, 7*.
Petroleum	1*, 3*, 4*, 5*, 6*, 7*, 8*
Foaming	1*, 3*, 4*, 5*, 6*, 7*.
Odor	1*, 3*, 4*, 5*, 6*, 7*.
Debris	1*, 3*, 4*, 5*, 6*, 7*.
Sewage	1*, 3*, 4*, 5*, 6*, 7*.
Dye Release	1*, 3*, 4*, 5*, 6*, 7*.
Other Chemicals	1*, 3*, 4*, 5*, 6*, 7*.

*Outside referral contacts are determined on a case by case basis by WQMD managers or staff based on the location and size of the issue. Wayne County Drains will be notified if a County Drain is involved. Any large spill or dumping of any polluting material to waters of the state will be referred to EGLE – WRD.

CONTACT AND PHONE NUMBER

1) EGLE – Water Resources Division	(586) 753-3794
2) MDNR – Fisheries	(313) 396-6890
3) Wayne County Drains	(734) 285-7233
4) Wayne County Emergency Management	(734) 942-5289
5) Wayne County Water Quality Mgt Director	(734) 224-8282
6) PEAS 24 hour Hotline (EGLE)	(800) 292-4706
7) Community DPW and Fire Dept	See Dye Release notification
8) National Response Center	1-800-424-8802
9) e-mail: DNR-FISH-Report-Fish-Kills@michigan.gov	

Appendix E - Attachment 4.3

Wayne County Department of Public Services Land Resource Management Division

Complaint Response Standard Operating Procedure

- 1) Non-emergency incoming complaints or referrals received by the Wayne County Department of Public Services (WCDPS) Land Resource Management Division (LRMD) are reviewed by a Department Manager or Division Director to evaluate the nature of the complaint. If the nature of the complaint is within the purview of the Division, the Division will initiate an investigation. If the complaint is not in this Division's purview or jurisdiction, it will be referred to the appropriate agency or jurisdiction at the time the complaint is received.
- 2) Complaints/referrals within the Division's purview are forwarded from the Manager/Director to an available LRMD field staff member who will investigate the complaint immediately if instructed to do so or as soon as practically possible (typically within 24 hours or next business day depending on the nature of the complaint). If there is no field staff available, and the complaint is urgent, the DM will investigate.
- 3) The investigating personnel will determine the magnitude/severity of the complaint based on site conditions. If the investigation indicates that the complaint is related to a facility regulated by LRMD, field staff members will either contact the facility or conduct an inspection of the facility as appropriate. Once on site, field staff will complete an inspection report noting any violations observed at the facility. Upon returning to the office the complaint form will be completed and will be given to the program secretary along with any inspection reports generated as a result of the investigation.
- 4) The Solid Waste Program secretary enters the report into the complaint database. The Department Manager makes a determination as to whether the investigation is complete or additional follow-up/referrals are warranted.
- 5) Complaints that involve potential or active discharge to surface waters from the County's MS4 are forwarded from the LRMD Department Manager to an available Department Manager in the Water Quality Management Division (WQMD) for investigation support. The volume of material spilled/discharge to waters of the state is estimated for reporting in compliance with the County's storm water permit.

Immediate Hazard Standard Operating Procedure

If an immediate hazard/major spill is identified by staff, call the following, in this order.

Local Community

Community Public Safety Department	From site call 911
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Internal Wayne County Contacts

Wayne County Emergency Management*	(734) 728-3711
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* Responsible for notifying Chief Executive Office and County Press Officer, as appropriate

Contact one of the following individuals, this person will be known as the Incident Office Coordinator who will contact the remainder of the list as appropriate.

WC Drain Commissioner Facilities Management Division Elmeka Steele	(313) 224-8116
Land Resources Management Division Patrick Cullen	(734) 326-4437
Wayne Co. Corporation Counsel Stephen Campbell	(313) 224-6822
Parks Division Alicia Bradford	(734) 261-2022
Roads Division William Bantom	(734) 955-2290
WCDPS - Administration Beverly Watts	(313) 224-7764

External Contacts

During business hours(speak to someone) EGLE Southeast MI – Warren Office	(586) 753-3794
No Answer or after hours: PEAS (pollution emergency alert system)	(800) 292-4706
National Response Center	(800) 424-8802

Appendix E - Attachment 4.4

Wayne County Department of Public Services Facilities Management Division

Complaint Response Standard Operating Procedure

- 1) Non-emergency incoming complaints or referrals received by the Wayne County Department of Public Services (WCDPS) Facilities Management Division (FMD) are reviewed by the Department Manager to evaluate the nature of the complaint. If the nature of the complaint is within the purview of the Division, the Division will initiate an investigation. If the complaint is not in this Division's purview or jurisdiction, it will be referred to the appropriate agency or jurisdiction at the time the complaint is received.
- 2) Complaints/referrals within the Division's purview are forwarded from the Department Manager (DM) to available FMD field staff members who will investigate and address the complaint immediately if instructed to do so or as soon as practically possible (depending on the nature of the complaint). If there is no field staff available, and the complaint is urgent, the DM will investigate.
- 3) The field staff will determine the magnitude/severity of the complaint based on site conditions. Once on site, the field staff will complete a work order form noting what work has been completed and any additional work that may need to be performed in order to address the complaint. Upon returning to the office, the work order form will be completed and will be given to the DM along with any photographs taken as a result of the investigation and work performed.
- 4) The DM enters the work order information into the complaint database. The Department Manager makes a determination as to whether the investigation is complete or additional follow-ups/referrals are warranted.
- 5) Complaints that involve potential or active discharge to surface waters from the County's MS4 are forwarded from the FMD Department Manager to an available Department Manager in the Water Quality Management Division (WQMD) for investigation support. The volume of material spilled/discharge to waters of the state is estimated for reporting in compliance with the County's storm water permit.

Immediate Hazard Standard Operating Procedure

If an immediate hazard/major spill is identified by staff, call the following, in this order.

Local Community

Community Public Safety Department	From site call 911
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Internal Wayne County Contacts

Wayne County Emergency Management*	(734) 728-3711
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* Responsible for notifying Chief Executive Office and County Press Officer, as appropriate

Contact one of the following individuals, this person will be known as the Incident Office Coordinator who will contact the remainder of the list as appropriate.

WC Drain Commissioner Facilities Management Division Elmeka Steele	(313) 224-8116
Land Resources Management Division Patrick Cullen	(734) 326-4437
Wayne Co. Corporation Counsel Stephen Campbell	(313) 224-6822
Parks Division Alicia Bradford	(734) 261-2022
Roads Division William Bantom	(734) 955-2290
WCDPS - Administration Beverly Watts	(313) 224-7764

External Contacts

During business hours(speak to someone) EGLE Southeast MI – Warren Office	(586) 753-3794
No Answer or after hours: PEAS (pollution emergency alert system)	(800) 292-4706
National Response Center	(800) 424-8802

Appendix E - Attachment 4.5

Wayne County Department of Public Services Roads Division

Complaint Response Standard Operating Procedure

- 1) Non-emergency illegal dumping or spill complaints received by the Wayne County Department of Public Services (WCDPS) Roads Division are reviewed by one of the Department Managers, or Road Maintenance Engineer to evaluate the nature of the complaint.
- 2) Complaints that involve potential or active discharge to surface waters from the County's MS4 are forwarded from the Roads Division Engineer to an available Department Manager in the Water Quality Management Division (WQMD) for investigation support. The volume of material spilled/dischARGE to waters of the state is estimated for reporting in compliance with the County's storm water permit.
- 3) Complaints that involve litter or illegal dumping of trash are investigated by Roads Division staff and if determined to be non-hazardous the material is cleaned up and disposed of properly. Incidents of non-hazardous illegal dumping and clean up are recorded by date and location by the Roads Department Managers for reporting to the WQMD in compliance with the County's storm water permit.
- 4) Incidents of illegal dumping involving potentially hazardous materials are referred to the local fire department for HAZMAT team response. HAZMAT team/public safety standard operating procedures including notifications are followed.

Immediate Hazard Standard Operating Procedure

If an immediate hazard/major spill is identified by staff, call the following, in this order.

Local Community

Community Public Safety Department	From site call 911
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Internal Wayne County Contacts

Wayne County Emergency Management*	(734) 728-3711
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* Responsible for notifying Chief Executive Office and County Press Officer, as appropriate

Contact one of the following individuals, this person will be known as the Incident Office Coordinator who will contact the remainder of the list as appropriate.

WC Drain Commissioner Facilities Management Division Elmeka Steele	(313) 224-8116
Land Resources Management Division Patrick Cullen	(734) 326-4437
Wayne Co. Corporation Counsel Stephen Campbell	(313) 224-6822
Parks Division Alicia Bradford	(734) 261-2022
Roads Division William Bantom	(734) 955-2290
WCDPS - Administration Beverly Watts	(313) 224-7764

External Contacts

During business hours(speak to someone) EGLE Southeast MI – Warren Office	(586) 753-3794
No Answer or after hours: PEAS (pollution emergency alert system)	(800) 292-4706
National Response Center	(800) 424-8802

Appendix E - Attachment 4.6

Wayne County Department of Public Services Parks Division

Complaint Response Standard Operating Procedure

- 1) Non-emergency illegal dumping or spill complaints received by the Wayne County Department of Public Services (WCDPS) Parks Division are reviewed by one of the Department Managers to evaluate the nature of the complaint.
- 2) Complaints that involve potential or active discharge to surface waters from the County's MS4 are forwarded from a Parks Department Manager (DM) to an available Department Manager in the Water Quality Management Division (WQMD) for investigation support. The volume of material spilled/discharge to waters of the state is estimated for reporting in compliance with the County's storm water permit.
- 3) Complaints that involve litter or illegal dumping of trash are investigated by Roads Division staff and if determined to be non-hazardous the material is cleaned up and disposed of properly. Incidents of non-hazardous illegal dumping and clean up are recorded by date and location by the Roads Department Managers for reporting to the WQMD in compliance with the County's storm water permit.
- 4) Incidents of illegal dumping involving potentially hazardous materials are referred to the local fire department for HAZMAT team response. HAZMAT team/public safety standard operating procedures including notifications are followed.

Immediate Hazard Standard Operating Procedure

If an immediate hazard/major spill is identified by staff, call the following, in this order.

Local Community

Community Public Safety Department	From site call 911
------------------------------------	--------------------

Internal Wayne County Contacts

Wayne County Emergency Management*	(734) 728-3711
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* Responsible for notifying Chief Executive Office and County Press Officer, as appropriate

Contact one of the following individuals, this person will be known as the Incident Office Coordinator who will contact the remainder of the list as appropriate.

WC Drain Commissioner Facilities Management Division Elmeka Steele	(313) 224-8116
Land Resources Management Division Patrick Cullen	(734) 326-4437
Wayne Co. Corporation Counsel Stephen Campbell	(313) 224-6822
Parks Division Alicia Bradford	(734) 261-2022
Roads Division William Bantom	(734) 955-2290
WCDPS - Administration Beverly Watts	(313) 224-7764

External Contacts

During business hours(speak to someone) EGLE Southeast MI – Warren Office	(586) 753-3794
No Answer or after hours: PEAS (pollution emergency alert system)	(800) 292-4706
National Response Center	(800) 424-8802