

## Genesee County Community Water Quality Consortium

# Illicit Discharge Elimination Program Plan



March 2023



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Genesee County Community Water Quality Consortium

# Illicit Discharge Elimination Program Plan

## **Member Communities**

City of Burton

City of Clio

City of Davison

Davison Township

City of Fenton

Fenton Township

Flint Township

City of Flushing

Genesee County

Genesee Charter Township

City of Grand Blanc

Grand Blanc Township

City of Linden

City of Mt. Morris

Mt. Morris Charter Township

City of Swartz Creek

Vienna Charter Township

March 2023

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### ACRONYMS/ABBREVIATIONS

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Acronyms/Abbreviations	Definition
CCTV	Closed Circuit Television Video
CFR	Code of Federal Regulations
DPW	Department of Public Works
EGLE	Michigan Department of Environment, Great Lakes, and Energy
EPA	United States Environmental Protection Agency
GC	Genesee County
GCDC	Genesee County Drain Commissioner
GCDC SWM	GCDC Surface Water Management
GCDC WWS	GCDC Water & Waste Services
GCHD	Genesee County Health Department
GCRC	Genesee County Road Commission
IDEP	Illicit Discharge Elimination Program
MDEQ	Michigan Department of Environmental Quality
MPN	Most Probable Number
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
NTU	Nephelometric Turbidity Unit
PA	Public Act
PEAS	Pollution Emergency Alert System
POD	Point of Discharge
POTW	Publicly Owned Treatment Works
ROW	Rights-of-way
SESC	Soil Erosion and Sedimentation Control
TDS	Total Dissolved Solids
TMDL	Total Maximum Daily Load

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## 1.0 INTRODUCTION

The purpose of this Illicit Discharge Elimination Program (IDEP) Plan is to prohibit and eliminate illicit discharges and connections, including discharges of sanitary wastewater to the municipal separate storm sewer system (MS4). The separate storm sewer system includes both open and enclosed drainage systems that are owned or operated by a municipality or other public agency and discharge to a surface water of the State or to a separate storm water drainage system operated by another public agency.

### 1.1 CONTACT INFORMATION

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Name of Municipality: \_\_\_\_\_

Position of Employee Responsible for IDEP: \_\_\_\_\_

### 1.2 WHERE TO FIND UP-TO-DATE MAPS

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The Drain Commissioner’s Office- SWM on behalf of the Member Communities has digitized storm sewer maps to a GIS system. Genesee County permit includes property operated and maintained by multiple county departments. There are thousands of outfalls with thousands of maps and record drawings. The outfalls for Genesee County Departments and Municipalities have been located to the maximum extent practicable. Additions, deletions, or corrections occur as changes are found and as part of a continuous improvement process. Changes are documented in the progress reports. GCDC-SWM attempts to maintain drainage information in a GIS however ultimate responsibility falls on the individual departments and municipalities. Up-to-date storm drainage system maps are available at the locations identified below.

Genesee County Agencies	Address	Map Storage
GCDC-SWM	4608 Beecher Road, Flint MI 48532	√ + GIS
GCDC-WWS	4610 Beecher Road, Flint MI 48532	√
GCRC	211 West Oakley Street, Flint MI 48503	√
GC Buildings & Grounds	1101 Beech Street, Room G-29, Flint MI 48502	√
GC Parks & Recreation	5045 Stanley Road, Flint MI 48506	√

Address of where the Municipal storm sewer maps are kept: \_\_\_\_\_

### 1.3 OUTFALL AND POINT OF DISCHARGE INFORMATION

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Known outfalls and discharge points are provided in Appendix A: Outfall Maps and Table. Refer to Section 2.1 for an explanation of the priority information. Refer to Section 2.2.1 for a discussion regarding if the location is a downstream point that will be screened or an upstream point that will not be screened. Also refer to Section 2.2.1 for a discussion of locations excluded from screening because there is no possible illicit discharge present.

### 1.4 DEFINITIONS

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

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**Illicit discharge** means any discharge to, or seepage into, a municipal separate storm sewer system that is not composed entirely of storm water or uncontaminated groundwater. Illicit discharges include non-storm water discharges through pipes or other physical connections; dumping of motor vehicle fluids, household hazardous wastes, domestic animal wastes, or litter; collection and intentional dumping of grass clippings or leaf litter; or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-storm water waste directly into a separate storm sewer.

**Municipal separate storm sewer** means a conveyance or system of conveyances designed or used for collecting or conveying storm water which is not a combined sewer, and which is not part of a publicly owned treatment works as defined in the Code of Federal Regulations at 40 CFR 122.2.

**Municipal separate storm sewer system (MS4)** means all separate storm sewers that are owned or operated by the United States, a state, city, village, township, county, district, association, or other public body created by or pursuant to state law, having jurisdiction over disposal of sewage, industrial wastes, storm water, or other wastes, including special districts under state law, such as a sewer district, flood control district, or drainage district, or similar entity, or a designated or approved management agency under Section 208 of the Federal Act that discharges to the waters of the state. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

**Outfall** is the location at which a point source discharge enters the surface waters of the state.

**Point of discharge** (or discharge point) is the location of a point source discharge where storm water is discharged directly into a separate storm sewer system.

**Point source discharge** means a discharge from any discernible, confined, discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, or rolling stock. Changing the surface of land or establishing grading patterns on land will result in a point source discharge where the runoff from the site is ultimately discharged to waters of the state.

**Polluting material** means any material, in solid or liquid form, identified as a polluting material under the Part 5 Rules (R 324.2001 through R 324.2009 of the Michigan Administrative Code).

**POTW** is a publicly owned treatment work.

**Separate storm sewer system** means a system of drainage, including, but not limited to, roads, catch basins, curbs, gutters, parking lots, ditches, conduits, pumping devices, or man-made channels, which is not a combined sewer where storm water mixes with sanitary wastes, and is not part of a POTW.

The term *stormwater* may be written as a single word, two words *storm water* and is sometimes hyphenated as *storm-water*. For the purposes of this document all three versions have the same meaning and may be used interchangeably. The professional industry has generally adopted the use of "stormwater" as one word and will be used as such throughout this document.

**Stormwater** means stormwater runoff, snow melt runoff, surface runoff and drainage, and non-stormwater included under the conditions of this permit.

**Stormwater discharge point** is the location where the point source discharge of stormwater is directed to surface waters of the state or to a separate storm sewer. It includes the location of all point source discharges where stormwater exits the facility, including outfalls which discharge directly to surface waters of the state, and points of discharge which discharge directly into separate storm sewer systems.

## 2.0 IDENTIFICATION AND ELIMINATION PROCEDURES

### 2.1 OUTFALL PRIORITIZATION

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Outfalls have been prioritized for investigation to target areas with higher potential problem areas first. Priority ranking is based on:

High Priority

- Highly urbanized areas
- Areas with a history of past illicit discharges
- Areas with a history of illegal dumping
- Areas with defined water quality impacts and a TMDL (\*High)

Medium Priority

- Commercial land use areas
- Residential land use areas

Low Priority

- Areas not classified as high or medium priority.
- Point of discharges that have been dry weather screened downstream (#Low)

Excluded

- Outfalls and discharge points which have no potential for illicit discharges are excluded from the screening process. Refer to Section 2.2.1 for additional information.

Outfalls have been ranked based on the prioritization scheme discussed above. The rankings are provided in the tables and maps of the outfalls included in Appendix A: Outfall Maps and Table.

### 2.2 SCREENING PROCEDURE

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Screening is a term used to describe observing and recording physical characteristics of the drainage system in the field. The screening process may involve collection of water samples for testing. When an illicit discharge is suspected, the screening process is followed by source investigation and corrective actions as appropriate.

#### 2.2.1 Screening Locations

Locations of the outfalls and discharge points, with prioritization information, is provided in Appendix A: Outfall Maps and Table. Section 2.1 describes the prioritization approach used.

Genesee County has entered into a PA 342 agreement with the surrounding communities. These interagency agreements impact which outfalls and discharge points are screened. The furthest downstream outfall or discharge point amongst all the cooperating agencies will be screened. Outfalls and discharge points upstream of screened locations will only be screened as deemed necessary during source tracking potential problems. Investigation sites may be moved upstream of the outfall as deemed necessary based on field conditions and site accessibility. Upstream points are distinguished with additional letters/numbers after the outlet number. For example, outfall = 6524751, upstream sampling sites = 6524751-XXX###)

Outfalls and discharge points which have no potential for illicit discharges are excluded from the screening process. These locations are mapped and identified as an outfall (or discharge point) but categorized as “**excluded**” from requiring dry weather screening efforts. This category is limited to roadway drainage in undeveloped areas with no dwellings and no sanitary sewers; drainage for athletic fields, parks or undeveloped



green space and associated parking without services; and cross-country drainage alignments (that neither cross nor are in proximity to sanitary sewer alignments) through undeveloped land.

Mapping of the outfalls and discharge points (refer to Appendix A: Outfall Maps and Table) identifies:

- Upstream jurisdictional outfalls and discharge points which will not be screened because a downstream point will be screened. (#Low)
- Excluded outfalls and discharge points with no potential for illicit discharges.

### 2.2.2 Weather Conditions

Field investigations to find illicit discharges generally occur during dry weather conditions to minimize the presence of dry weather flow in the storm drainage system. In urban areas predominately served by storm sewers investigations will take place after 48-hours of less than 0.10 inches of precipitation. In rural areas predominately served by tiles, swales, and ditches investigation will take place after 72-hours of less than 0.10 inches of precipitation. The precipitation criteria are general guidelines and not strict requirements.

The presence of dry weather flow is not itself an indication of an illicit discharge. Storm drainage systems routinely convey groundwater and runoff from excess irrigation.

### 2.2.3 Screening Information

The purpose of screening is to determine the likelihood of the presence of an illicit discharge. The screening process involves visual and olfactory observations and may include testing water samples for various chemical, physical, and biological parameters.

The information below is recorded during a screening. An example field form is provided in Figure 1. The form is subject to change however the basic information discussed below will be collected.

- Core information on the site location, the date and time of the screening, and the personnel conducting the screening.
- Visual observations for the presence of deposits, stains, algae, vegetation, trash, debris, and flow. When flow is present observations also include the presence of surface sheens and suds or foam, and the color and clarity of the water.
- Olfactory observations for the presence of chemicals, sewage, and other odors not typically associated with the drainage system.

If the visual observations indicate a potential illicit discharge, flow is observed, and the source of the flow is not immediately identifiable then a water sample will be collected during a screening and tested for indicator parameters (refer to Section 2.2.4).

**IDEP Field Screening Results** 8826001

**Section A: Core**

A1: Location ID: 8826001      A3: Observation Date/Time: May 31, 2022 12:41 PM  
 A2: Latitude:      A4: Inspector 1: TT - Maddie Tatar  
 Longitude:      A5: Inspector 2: TT - Lauryn Roberts  
 A6: Location Description: 8826001

**Section B: Preselected Site**

B1: Preselected site? Yes      B2: Site Found: Yes      B3: Site Accessible: Yes  
 B4: Provide Reason if not accessible:

**Section C: Conveyance Asset Information**

C1: Type of system? Downstream end of a Pipe (or culvert) discharging to a Channel (ditch or drain)  
 C2: Asset Type: Culvert      C5: Width or Dia (in): 18  
 C3: Which end? Downstream End      C7: Height (in):  
 C4: How direction: South (180 Deg)      C8: Material: Corrugate Metal  
 C5: Shape: Circular (round)

**Section D: Site Indicators**

D1: Animal Presence nearby	None Observed	D8: Sediment Accum	None
D2: Odors	None Detected	D9: Algae/Slime	None
D3: Odor Severity	None	D9a: Color of Algae/Slime	
D4: Dep/Stains - Oil/Grease	None	D10: Vegetation Growth	Normal Growth
D5: Dep/Stains - Sewage Fungus	None	D11: Structural Damage	Good Condition
D6: Dep/Stains - Paint	None	D12: DWF Present?	No Dry Weather Flow Present
D7: Dep/Stains - Other	None		

**Section E: Water Indicators**

L1: How depth (in)		E4: Floatables - Petroleum	
L2: Floatables - Sewage		E4a: Does sheen break apart?	
E3: Floatables - Suds		E5: Floatables - Other	
E3a: Color of Foam/Suds		E6: Color	
E3b: Are suds/foam slippery		E7: Turbidity	
E3c: Odor		E8: Sediment Discharge	
E3d: Odor Severity		E9: Sample Collected?	
E3e: Location of Suds/Foam			

**Section F: Overall Field Characterization, characterization by crews in the field, not a final determination**

F1: Overall Field Characterization: Unlikely

**Section I: Comments**

**Section J: Lab Samples**

Parameter	Result Code	Result	Units	Action Levels
J4: pH				< 7 or > 9
J5: Water Temperature				
J6: Ammonia				≥ 1.0 mg/l
J7: Surfactants				≥ 0.2 mg/l
J8: E. coli				≥ 2000 CFU/100ml

Note: ammonia: NH<sub>3</sub>-N=ammonia; NH<sub>4</sub>-N=ammonium; NO<sub>2</sub>-N=nitrite; NO<sub>3</sub>-N=nitrate; TOC=total organic carbon; TSS=total suspended solids; TDS=total dissolved solids; BOD<sub>5</sub>=biochemical oxygen demand; COD=chemical oxygen demand

**Section K: Conclusion/Next Steps**

K1: Conclusion: Illicit discharge unlikely, no further action needed this permit cycle  
 K2: Next Step - Explained:  
 K3: Conclusion By: Jenna Troppman      K4: Conclusion Date: June 1, 2022 8:00 PM  
 Section L: Checked  
 L1: Checked By: Dan Christian      L2: Checked On: June 2, 2022 8:00 PM

Figure 1 Example Screening Form

### 2.2.4 Water Samples

When the visual observations indicate a potential illicit discharge, flow is observed, and the source of the flow is not immediately identifiable then a water sample is collected. The collection of water samples is dependent on having a sufficient flow stream present to physically collect a sample, the accessibility of the flow stream, and ensuring the flow stream is sufficiently isolated from other sources of water. Standing water or water moving very slowly is not sampled. Field staff may opt to not collect water samples at the time of the visit and instead collect samples as part of subsequent screenings.

Based on the suspected discharge or the pollutant of concern, some or all the following parameters will be assessed:

- pH will be measured (in the field) if an industrial discharge is suspected.
- Surfactants will be tested for if the flow is observed to have foam or suds, or if a sanitary discharge is suspected.
- *Escherichia coli* (*E. coli*) will be tested for if a sanitary discharge is suspected. For pathogen analysis, the goal is to deliver samples to the laboratory within 6 hours of collection where sampling processing will occur within 2 hours for the 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.
- Other parameters may be tested for depending on the suspected source.

Table 1 provides general information on common indicator parameters.

Table 1 Common Indicator Parameters

Parameter	Indicates	Comments	Threshold
Ammonia	Sewage and some industries.	May come from non-human sources such as pets or wildlife	> 1 mg/L
Boron	Laundry wash water and sewage	Common in water softener products	> 0.35 mg/L
Conductivity	High in industrial discharges. Moderate in sewage and wash water.	Correlated to TDS. High levels with deicing salts.	> 1,000 µS/cm
Enterococci	Sewage or septage	Elevated levels from pet and wildlife	
E. coli	Sewage or septage	Elevated levels from pet and wildlife	> 2,000 cfu/100 mL or MPN/100 mL
Fluorescence	Detergents	Degree of fluorescence varies based on specific detergent formulations	
Fluoride	Treated potable water		> 0.25 mg/L
Hardness	May help to distinguish natural groundwater from tap-water		
pH	Industries	Often not conclusive by itself	<6.5 or >9.0
Potassium	Sewage and some industrial process water	May be used in combination with ammonia to distinguish wash waters from sanitary wastes	
Surface Tension	Surfactants	Only useful when surfactants are at high levels	
Surfactants	Detergents found in sewage and wash water. Cleansers, emulsifiers, and lubricants in industrial or commercial liquid wastes.		> 0.2 mg/L
Total Coliform	Sewage or septage	Elevated levels from pet and wildlife	
Turbidity	Potentially useful screening indicator to determine if the discharge is contaminated (i.e., not composed of tap water or groundwater).		> 5 NTU
Total Dissolved Solids (TDS)	High in industrial discharges. Moderate in sewage and wash water.	Correlated to conductivity. High levels with deicing salts.	> 500 mg/L

### 2.2.5 Screening Process

The screening process follows a simple process of starting at the outfall or discharge point. If a potential illicit discharge may be present based on the results of the screening, then additional screenings are conducted upstream of the outfall or discharge point. The basic process follows the following steps:

1. **Initial Screening.** Work typically begins by looking at the outfall or discharge point. Locations are prioritized as discussed in Section 2.1. An initial field screening is completed, refer to Section 2.2.3 for the details on what is recorded. Collected water samples are provided to a laboratory for analysis. If there are significant signs of a potential problems at the time of the screening, then the problems are immediately traced upstream where possible and practical. Otherwise, the screening observations and laboratory test results are reviewed in the office before deciding the next step(s).
2. **Review Results.** Results of the screenings are reviewed and checked in the office to determine the next steps. When the observations and the test results indicate nothing out of the usual, an illicit discharge is ruled out at the site and for the tributary drainage network. When observations or test results indicate a potential problem may be present, then the site and upstream tributary drainage network is investigated further with additional screenings.

If multiple sites with suspected illicit discharges are being investigated at the same time, based on limited resources, sites with the greatest perceived problem will be dealt with first.

Lab results are typically received within 5 to 14 days. Screening results reviewed and next steps are determined within approximately 3 days from receipt of the lab reports.

3. **Additional Screenings.** Additional field screenings are completed as needed. The purpose of the additional screening is twofold; (1) validate the initial screening results that an illicit discharge may be present, and (2) attempt to narrow down the general location or source of the potential problem. The process repeats the cycle of collecting screening information, reviewing the results, and planning the next steps until either an illicit discharge is ruled out or different techniques are adopted to identify potential sources (discussed in Section 2.3).

Additional screening investigations are initiated in a timely manner, typically within 30 days (weather permitting) of the prior site visit and are conducted in priority order.

The following notes and approaches are provided to handle special conditions.

- **Water Sample Not Collected.** Field staff may opt to not collect water samples and instead collect samples as part of subsequent screenings. In these cases, the site will be revisited within 30 days of discovering the dry weather discharge and suspecting a problem. If the site is not discharging during the subsequent visit, it will be revisited within 30 days of the previous visit. If there is no discharge after two visits, the site will not be screened further unless there are other observations suggesting a potential illicit discharge.
- **Periodic Dry Weather Flow.** The presence of dry weather flow is not by itself an indication of an illicit discharge. Dry weather flow is very common in storm drainage systems and commonly associated with groundwater flow or excess irrigation.
- **Borderline Problems.** In the case where screening results are inconclusive, additional screenings may be conducted. In these cases, the site may be revisited within 30 days of the previous screening. A determination will then be made as to the likelihood of an illicit discharge. Locations of concern will be prioritized and scheduled for additional screenings.
- **Periodic Elevated *E. coli* Concentrations.** Elevated levels of *E. coli* are periodically found once but not on subsequent site visits. In these cases, the site will be revisited within 30 days of discovering the elevated concentration level of *E. coli*. If *E. coli* concentration levels are below threshold values during the subsequent visit, the site will be revisited within 30 days of the previous visit. If *E. coli* concentrations are below the threshold limit two visits in a row, the site will not be screened further unless there are other observations suggesting a potential illicit discharge. The source of the periodically elevated *E. coli* concentration is typically associated with domestic or wild animals.
- **Periodic Elevated Surfactant Concentrations.** In the event where elevated levels of surfactants are found, the site will be revisited within 30 days. If surfactant concentration levels are below threshold values during the subsequent visit, the site will be revisited within 30 days of the previous visit. This process will be repeated up to three times. If surfactant concentrations are below the threshold limit for three (3) consecutive visits, the site will not be screened further unless there are other observations suggesting a potential illicit discharge. Sites with periodic elevated surfactant concentrations will be placed on a watch list for annual screening. The site will be removed from the watch list if screenings over three (3) consecutive years shows no elevated surfactants,

### 2.3 SOURCE INVESTIGATION PROCEDURE

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Source investigation procedures are used to identify the specific source of the potential illicit discharge. These methods are typically used after the screening process narrows down the area of interest. The means and methods selected vary based on site conditions.

Source investigation immediately follows the screening process after narrowing down the area of interest to the maximum extent practicable. Investigations are prioritized based on the severity of the perceived problems. Source investigation is initiated within two weeks of concluding the screening process.

Common methods utilized as a part of source investigation include, but are not limited to:

- **Visual Inspections.** Generally visual inspection of sites are conducted as a part of the screening process (Section 2.2).
- **Sound Testing.** Sound testing involves rapping or striking a structure and listening for the sound to carry through a pipe. Sound testing is often used to confirm connectivity of the drainage system.
- **Dye Testing.** Dye testing involves inserting a tracer dye in a plumbing fixture or drainage system and observing the presence of the dye at other locations. Dye testing is often used to confirm connectivity. The use of tracer dyes with the potential to discharge to the surface waters of the state are regulated and require a permit from EGLE.
- **Smoke Testing.** Smoke testing involves blowing a non-toxic simulated smoke through the collection system to determine connectivity. Smoke testing requires notifying the residents and local authorities. Smoke found exiting a building plumbing vent indicates that the home is illicitly connected to the storm sewer. Smoke testing may be inconclusive when water traps or other blockages are present.
- **Video Surveillance.** Closed Circuit Television Video (CCTV) sewer inspections are commonly used to look at pipe conditions and locate connecting pipes (or taps) in the sewers. Video the sewer pipes may not by itself confirm connectivity and may be followed by dye testing or other similar approach.
- **Sandbagging.** Temporarily sandbagging a sewer pipe may be useful to check for intermittent flow conditions. Sandbagging involves partially blocking the lower portion of a drainage pipe and is only used during dry weather conditions.

The following notes and approaches are provided to handle special conditions.

- **Suspected Domestic Animals Sources.** Elevated levels of *E. coli* are often attributed to animal sources. Before attributing the source to animals, human sources of are checked for. The source of *E. coli* may be identified as coming from domestic animal sources based on observed animal tracks and/or scat. Sites with potential problems identified as coming from domestic animals will be referred to for public education activities to inform the nearby residents of proper disposal of pet waste.
- **Suspected Wildlife Sources.** Elevated levels of *E. coli* are often attributed to animal sources. Before attributing the source to animals, human sources of are checked for. The source of *E. coli* may be identified as coming from wildlife animal sources based on observed animal tracks and/or scat. DNA testing may be performed to rule out human sources of *E. coli*.

## 2.4 CORRECTING ILLICIT DISCHARGES AND CONNECTIONS

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

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

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

## 3.0 RESPONSE PROCEDURES

### 3.1 ILLEGAL DUMPING AND SPILLS

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Response to illegal dumping and spills is initiated with the steps below. For emergencies, due to time an initial phone call may be given. Emails, copies of documentation or letters will be sent as written notification.

1. **Initial Notification.** When a municipality or County Agency becomes aware of a potential illicit discharge, a Spill Notification Complaint Reporting Form (refer to Figure 2 for an example) is filled out based on the information available.
2. **Initial Emergency Assessment and Contact.** Assess if this is an emergency or if the spill is actively happening. If yes, then 911 is called to initiate the emergency response by contacting the fire department, police, emergency management and the hazardous response teams as appropriate. Refer to Section 4.0 for reporting requirements.
3. **County and Other Local Units of Government**
  - a. **Genesee County Drain Commissioner's Office –Surface Water Management (GCDC-SWM)** is to be notified. The Drain Office will initiate the Spill Notification Complaint Reporting Form if it has not already been started.
  - b. **Other Governmental Agencies** that need to be notified will be and noted on the Spill Notification Complaint Reporting Form.

There are many ways complaints and or other agency referrals regarding illegal dumping and spills may be responded to after the initial notification and reporting process. These are described below.

Based on the information given, GCDC-SWM will investigate and document. Sites with active suspected discharges will be visited within 3 business days for an initial site investigation. Every effort will be made to investigate the same day as the GCDC-SWM office is notified. If the suspected discharge is not active, the site

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will be visited within 30 business days. Based on the type of illicit discharge GCDC-SWM will respond with the most appropriate action within the limits of the law.

If the site location drains to a MS4 that is not part of the Genesee County Community Water Quality Consortium, the involvement of the consortium may end after notifying the MS4 owner.

A follow up investigation may be required based on the actions taken to address the problems. This second inspection would involve follow-up field screening and source investigations. Depending on what is necessary, this second investigation should occur within 2-weeks.

Depending on the type and location of an illicit discharge, the responsible party can change. In a spill or emergency, 911 should be called to initiate the emergency response. As an illicit discharge is identified and information is gathered, the responsible party will be identified. The responsible MS4 permit holder may change as the source is tracked down. The quantity of the spill should also be considered in conjunction with the type of spill that has occurred before reporting it. For example, wastewater from painting activities need not be reported to 911 but one may wish to mention it to the authorities such as public works, or the GCDC to have them contact the offender to educate them.

**Illegal Dumping.** The local unit of government has jurisdiction. Emergency services are contacted when appropriate. The local responder will depend on the nature of the discharge (see above) and if a responsible party is identified. If a responsible party is identified, a private cleanup company may be involved. The MS4 owner is the enforcement agency for follow up.

**Illicit Sanitary Connection.** Once identified, the local unit of government has jurisdiction and enforcement for proper connection to the sanitary sewer system. In the case of failing or improper on-site sewage (septic) systems, the Health Department has jurisdiction and enforcement responsibility.

**Failing Soil Erosion Measures.** MS4 owners are the enforcement agency after construction is complete, and the soil erosion permit has been released. If the site is currently under construction, the permittee will make sure the presiding SESC agency has been notified pursuant section 9107 of Part 91 and fill out a spill form. If there is an active SESC permit, then the presiding SESC agency is the enforcement agency.

**Large Quantity Spill.** The permittee will make sure 911 and PEAS has been contacted, who will contact the fire department, police department, emergency management and the hazardous response team. The local responder will depend on the nature of the discharge and if a responsible party is identified. If a responsible party is identified, a private cleanup company may be involved. The MS4 owner is the enforcement agency for follow up.

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

Within Individual communities, if an emergency spill is received, the individuals listed in Table 2 will make sure that the call gets resolved or forwarded to the responsible agency.

Table 2 Unit of Government Responsible Party

Unit of Government	Contact
Argentine Township	Supervisor or DPW
Atlas Township	Supervisor or DPW
Burton, City of	DPW Director
Clayton Charter Township	Supervisor or DPW
Clio, City of	City Administrator

## Illicit Discharge Elimination Program Plan

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Unit of Government	Contact
Davison Township	DPW Director
Davison, City of	Clerk/DPW
Fenton Charter Township	Ordinance Enforcement Officer
Fenton, City of	DPW Director
Flint Charter Township	Building Dept Agent
Flint, City of	
Flushing Charter Township	Supervisor or DPW
Flushing, City of	DPW Supervisor
Forest Township	Supervisor or DPW
Gaines Township	Supervisor or DPW
Gaines, Village of	Supervisor or DPW
Genesee County	GCDC-SWM Drain Engineer
Genesee Charter Township	Code Enforcement Officer
Goodrich, Village of	Supervisor or DPW
Grand Blanc Charter Township	Director of Public Service
Grand Blanc, City of	Public Works Director
Lennon, Village of	Supervisor or DPW
Linden, City of	DPW Director
Montrose Charter Township	Supervisor or DPW
Montrose, City of	Supervisor or DPW
Mount Morris Charter Township	Code Enforcement Officer
Mount Morris, City of	DPW Superintendent
Mundy Charter Township	Supervisor or DPW
Otisville, Village of	Supervisor or DPW
Otter Lake, Village of	Supervisor or DPW
Richfield Township	Supervisor or DPW
Thetford Township	Supervisor or DPW
Swartz Creek, City of	DPW Director
Vienna Charter Township	Building Superintendent

Only Police can ticket and activate emergency response. General County Agencies and Nested Jurisdictions are not able to issue fines, pursuant to the individual law(s) each agency and nested jurisdiction operates under.



**Illicit Discharge Elimination Program Plan**

<div style="background-color: #0056b3; color: white; padding: 5px; border-radius: 5px; display: inline-block;"><b>Front</b></div>	<p>Spill Notification Complaint Reporting Form Illicit Discharge Elimination Program Genesee County</p>	<p>Municipality: _____ TWP Section where incident occurred: _____</p>
<p>Complaint made by: _____ Phone #: _____ Date: _____ Time: _____ Do you have an estimate of how much pollutant got discharged? _____ Location of Discharge: _____ Offending Party (if known) _____ Nature of Problem (i.e. paper waste, odor, color, etc.): _____ _____</p>		
<p>Is this an Emergency? Yes <input type="checkbox"/> (Then Phone 911) <input type="checkbox"/> No Nature of Emergency: _____ _____</p> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p>Initial Contact made to:</p> <input type="checkbox"/> 911  <input type="checkbox"/> Fire Dept. _____  <input type="checkbox"/> Police Dept. _____  <input type="checkbox"/> GCDC 732-1590  <input type="checkbox"/> GCHD 257-3612  <input type="checkbox"/> GCRC 767-4920  <input type="checkbox"/> PEAS Hotline (State) 1-800-292-4706  <input type="checkbox"/> Other _____</div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;"> <p>Additional Comments: _____ _____ _____</p> </div>	<div style="border: 1px solid black; padding: 5px;"> <p><i>Site Investigation</i></p> <p>Date of Observation: _____ Investigating Agency: _____ Location of Discharge: _____</p> <p><input type="checkbox"/> Initial Investigation <input type="checkbox"/> Follow-up Investigation</p> <p>Crew Members: _____ _____</p> <p>Investigation Location: _____ _____</p> <p>Observations (odor, color, volume, etc): _____ _____</p> </div>	<div style="border: 1px solid black; padding: 5px;"> <p>Actions Taken: _____ _____</p> <p>Danger to health and/or environment: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Were photos taken: <input type="checkbox"/> Yes* <input type="checkbox"/> No Date Corrected: _____ * Please attach copies</p> <p>If necessary: Agency Referred to: _____ Agency Contact: _____ Method of Communication: <input type="checkbox"/> E-mail <input type="checkbox"/> Letter/memo <input type="checkbox"/> Phone</p> <p>Content of Communication: _____ _____</p> </div>

<div style="background-color: #0056b3; color: white; padding: 5px; border-radius: 5px; display: inline-block;"><b>Back</b></div>	<p>Spill Notification Complaint Reporting Form Illicit Discharge Elimination Program Genesee County</p>		
<ol style="list-style-type: none"> <li>1. Take down complaint information.</li> <li>2. Fill out the Spill Notification form for the Illicit Discharge Elimination Reporting System.</li> <li>3. Inform the caller that the problem will be further investigated and thank him/her for calling in.</li> <li>4. If the problems are related to sanitary please contact the Genesee County Health Department at (810) 257-3612.</li> <li>5. If the problem is related to oil please phone 911.</li> <li>6. If the spill/ discharge has released any polluting materials to the surface waters of the State or the ground waters of the State the appropriate district office must be notified immediately. Phone (517) 284-6651, fax: (517) 241-3571. You may call 24-hour Polluting Emergency Alerting System phone # (800) 292-4706 after hours.</li> <li>7. Please fax completed form to appropriate agency: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-right: 1px solid black; padding: 5px;"> <p>Emily Koryto at EGLE <a href="mailto:KorytoE2@michigan.gov">KorytoE2@michigan.gov</a> Phone 517-282-6723</p> </td> <td style="width: 50%; padding: 5px;"> <p><b>and</b> Genesee County Drain Commissioner c/o Holly DeBoer hdeboer@geneseecountymi.gov Phone 810-732-1590 Fax (810)732-1474</p> </td> </tr> </table> </li> </ol> <p style="margin-top: 20px;">GCHD: Fax: (810) 257-3125 GCRC: Fax: (810) 767-5373</p>		<p>Emily Koryto at EGLE <a href="mailto:KorytoE2@michigan.gov">KorytoE2@michigan.gov</a> Phone 517-282-6723</p>	<p><b>and</b> Genesee County Drain Commissioner c/o Holly DeBoer hdeboer@geneseecountymi.gov Phone 810-732-1590 Fax (810)732-1474</p>
<p>Emily Koryto at EGLE <a href="mailto:KorytoE2@michigan.gov">KorytoE2@michigan.gov</a> Phone 517-282-6723</p>	<p><b>and</b> Genesee County Drain Commissioner c/o Holly DeBoer hdeboer@geneseecountymi.gov Phone 810-732-1590 Fax (810)732-1474</p>		

Figure 2 Spill Notification Complaint Reporting Form

## 3.2 OUTSIDE THE PRIORITY AREAS

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The response to potential illicit discharges outside the prioritized areas (Section 2.1) is the same as any other reported case of illegal dumping and spills. Sites with active suspected discharges will be visited within 3 business days for an initial site investigation. Every effort will be made to investigate the same day as the GCDC-SWM office is notified. If the suspected discharge is not active, the site will be visited within 30 business days. Based on the type of illicit discharge, GCDC-SWM will respond with the most appropriate action within the limits of the law.

## 4.0 REPORTING RELEASE OF POLLUTING MATERIALS

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, the information will be reported to EGLE. Significant petroleum or hazardous material spills are to also be reported to the National Response Center. Contact information includes:

***Pollution Emergency Alert System (PEAS) Hotline.*** Call the hotline at (800) 292-4706. The hotline is staffed 24 hours a day, seven days a week. During daytime hours, you may also contact the Lansing District Office of EGLE at (517) 284-6651.

***National Response Center (NRC).*** Many incidents that are reportable to EGLE also warrant reporting to the federal National Response Center which serves the U.S. Environmental Protection Agency. The Federal NRC hotline is (800) 424-8802.

***EGLE Environmental Assistance Center.*** If the matter is not an emergency but there are questions or seeking information about EGLE programs, regulations, reporting requirements, reportable quantities, etc. then the EGLE Environmental Assistance Center will be called at (800) 662-9278.

Within ten (10) days of the release, a full written explanation will be submitted to the State as to the cause of the release, the discovery of the release, response (clean-up and/or recovery) measures taken, and preventative measures taken or a schedule for completion of measures to be taken to prevent reoccurrence of similar releases.

## 5.0 TRAINING

Municipal employees, who, as part of their normal job responsibilities, may encounter or observe an illicit discharge, will receive training on recognizing and reporting of illicit discharges. Several resources are available to municipal employees which may serve as training. These resources include a tip card (refer Figure 3), a pre-recorded training video, a copy of the training video presentation slides, and general information regarding illicit discharges (including lots of photographs) provided on a public website (<https://cleargeneseewater.com/illicit-discharge>). Staff are to take training at least once per permit cycle that this information is available and new staff are provided the training materials within one (1) year of starting. Training of each employee will be documented.

### Important Numbers

**EMERGENCIES**

- Police/Fire 911
- MDEQ Pollution Alert System (PEAS) 800-292-4706; 24 hrs.

**NON-EMERGENCIES**

Genesee County:

Health Department 810-257-3603; 8 am - 5 pm

Drain Office - IDEP Coordinator 810-732-1590; 8 am - 5 pm

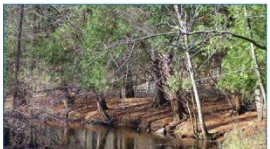
Road Commission 810-767-4920; 8 am - 5 pm

Local Municipal Contact: \_\_\_\_\_

Local Soil Erosion Agency: Drain Commissioner  
Water & Waste  
810-732-7870

### How to Spot Illicit Discharges



#### A Tip Card for Municipal Staff



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

### What to Report?

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

#### Soil Erosion from Construction Sites

**Observations:**


- Bare soils or banks with no soil erosion control fencing
- Muddy discharge from an outfall

**Contact:**  
Local soil erosion control agency (either the local community or county)

**Oil Sheen**

- Oil sheen
- Stained sediment, rocks or vegetation
- Odor: petroleum, chemical


**Contact:**  
IDEP coordinator or MDEQ



**White Foam**

- Odor: petroleum, chemical

**Contact:**  
IDEP coordinator and/or DPW

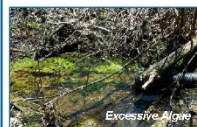


**Excessive Algae**

**Observations:**

- Algae growth near drain outlet or in a ditch

**Contact:**  
IDEP coordinator, DPW and/or Drain Office




**Soil Erosion**

**Observations:**

- Bare soils or banks with no soil erosion control fencing
- Muddy discharge from an outfall

**Contact:**  
Local soil erosion control agency (either the local community or county)



IDEP = Illicit discharge elimination program, DPW = Department of public works services, MDEQ = Michigan Department of Environmental Quality 3/2014

Figure 3 Illicit Discharge Tip Card for Municipal Staff

Field personnel will be provided additional training prior to conducting dry-weather screening and periodic refresher events are scheduled on an as-needed basis. Training includes health and safety, screening procedures, documentation, and reporting procedures. Training is conducted hands-on in the field by a professional engineer or other qualified individual for the field personnel. Train-the-trainer sessions are provided to member communities on an as-needed basis. Additional training is provided for activities associated with sampling, identifying, and eliminating the source of unauthorized discharges and illicit connections upon request.

## 6.0 PROGRAM EVALUATION

The following evaluation methods are used.

- Compare the number of illicit discharges eliminated versus the number found. This is done on an annual basis and reported to EGLE in the permit progress reports.
- Review the illicit discharge tracking forms and provide a summary in the permit progress reports.

- Review the ambient water quality monitoring results from the existing programs and look for trends and improvements related to illicit discharge program. The existing monitoring programs include Flint River GREEN, Flint River Watershed Coalition benthic monitoring, monitoring conducted for IDEP investigation and additional hot spot monitoring. This assessment is done at least once per permit cycle with the goal of more frequent review. Monitoring results are reported in the permit progress reports.

## 7.0 REGULATORY MECHANISM

The regulatory mechanism is a Public Act, Ordinance or Resolution that allows the Permittee to prohibit non storm water discharges into the applicants MS4. This was passed in the last approved permit cycle and is attached to the IDEP plan as Appendix B.

The regulatory mechanism should address the following items:

- Excludes prohibiting the discharge flows from firefighting activities to the applicants MS4.
- Excludes prohibiting the following categories of non-storm water discharges or flow.
  - a) Water line flushing and discharges from potable water sources.
  - b) Landscape irrigation runoff, lawn watering runoff, and irrigation waters.
  - c) Diverted stream flows and flows from riparian habitats and wetlands.
  - d) Rising groundwaters and springs.
  - e) Uncontaminated groundwater infiltration and seepage.
  - f) Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits.
  - g) Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps.
  - h) Air conditioning condensation.
  - i) Waters from noncommercial car washing.
  - j) Street wash water.
  - k) Dechlorinated swimming pool water from single, two, or three family residences. (A swimming pool operated by the permittee shall not be discharged to a separate storm sewer or to surface waters of the state without NPDES permit authorization from EGLE.).
- Regulates the contribution of pollutants the applicants MS4.
- Prohibits illicit discharges, including illicit connections and the direct dumping or disposal of materials.
- The authority established to inspect, investigate, and monitor suspected illicit discharges.
- Requires and enforces elimination of illicit discharges.

## APPENDIX A: OUTFALL MAPS AND TABLE

Insert Outfall table 1 and Maps

## APPENDIX B: REGULATORY MECHANISM

Insert regulatory mechanism here (ordinance or resolution for IDEP)