

ILLICIT DISCHARGE ELIMINATION PLAN

EATON COUNTY MS4
COC No. MIG610110

July 1, 2010

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Eaton County
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I. INTRODUCTION

This Illicit Discharge Elimination Plan (IDEP) has been prepared to meet the requirements of Certificate of Coverage Number MIG610110. This plan updates and replaces the previous plan submitted as part of the 2008 Storm Water Pollution Prevention Initiative.

A. Authority.

This IDEP is a requirement for Eaton County under the General Permit No. MIG610000 and the above referenced Certificate of Coverage. The permit includes the Eaton County Parks and the Eaton County Road Commission as nested jurisdictions. The Eaton County Board of Commissioners has delegated the administration of the permit to the Eaton County Drain Commissioner. In Eaton County, the Eaton County Drain Commissioner (ECDC) and the Eaton County Road Commission operate several drains within the Grand River Watershed. Appendix A contains a list of drains within the watershed that have been legally established. There are also drains that may have been constructed over the years which have not been legally established and over which the ECDC has no legal authority for access, maintenance or assessment of maintenance costs.

The Road Commission maintains a facility in the watershed in Delta Township and has prepared a separate SWPPI.

The Parks Department does not have any facilities within the watershed except for a shed for storing lawn mowing equipment at Fitzgerald Park. All maintenance of vehicles and equipment is performed by commercial dealers; fuel and gasoline are purchased in small amounts only on an as-needed basis.

The ECDC operates storm drains according to the Drain code of 1956 (P.A. 40 of 1956). Under Chapter 8, Section 280.196(1) "An annual inspection may be made of a drain established under this act" and "For county drains, the inspection shall be made by the drain commissioner, or a competent person appointed by the drain commissioner. For intercounty drains, the inspection shall be caused to be made by the drainage board."

Chapter 18, Section 280.423(1) prohibits the discharge of "any sewage or waste matter capable of producing in the drain detrimental deposits, objectionable odor nuisance, injury to drainage conduits or structures, or capable of producing such pollution of the waters of the state receiving the flow from the drains as to injure livestock, destroy fish life, or be injurious to public health."

B. Other Agencies.

Eaton County does not have any specific ordinance relating to discharges. However, within the watershed are cities, villages, and townships with whom the ECDC maintains excellent working relationships. Along with the Barry Eaton

District Health Department (BEDHD), any illicit discharges can be dealt with by coordinating with the appropriate agency.

Within the watershed boundary, the City of Eaton Rapids, the City of Lansing, Delta Township, the Village of Dimondale and the City of Grand Ledge operate sanitary sewer collection systems and publically owned treatment works. Private septic tanks and drain fields or engineered systems are permitted and regulated by the BEDHD.

C. Other Authority.

Ordinance 05-02-16 was approved by the Board of Commissioners.

PREAMBLE: "An Ordinance to provide for the administration of a soil erosion and sedimentation control program for those areas in Eaton County except for those of the county where a Part 91 Municipal Enforcement Agency program or Authorized Public Agency program is in effect, in order to encourage and regulate the proper use and protection of natural resources, to provide for administration and enforcement, to establish civil penalties for violations, and to provide for reimbursement of costs incurred by the County Enforcing Agency pursuant to this Ordinance and to Part 91, Act 451 of 1994, as amended."

Article 1. SHORT TITLE: "This Ordinance shall be known, and may be cited, as the "Eaton County Soil Erosion and Sedimentation Control Ordinance."

Article 3.1. "The Eaton County Drain Commissioner is the County Enforcing Agency responsible for administering and enforcing this ordinance."

Article 4.1. "Rules Adopted. The County of Eaton adopts by reference the rules promulgated by the Department of Environmental Quality pursuant to Part 91, as they currently exist and as they may be amended."

The County's specific program to administer and enforce the ordinance is not referenced in the ordinance itself, to provide for flexibility should changes be necessary. However, the current enforcement program has been reviewed and approved by the State over the course of numerous scheduled reviews. The latest review was conducted in 2009.

In addition, the APA program under which the drain commissioner conducts maintenance and construction activities received final approval from the State in March of 2010. However, there have been no follow-up on-site reviews by state personnel.

The COC lists the Pollutant of Concern for the TMDL as sediment. Maintaining an active SESC enforcement process, following up on inspections and complaints will address this Pollutant of Concern.

II. MAPPING

Eaton County has an existing Geographic Information System (GIS) in which many of the County drains have been added. Descriptions of drains are typically in land survey terms, tied to parcel or section corners. The plan for mapping will be as follows:

A. Base Mapping.

Working with the Eaton County GIS, the existing data base will be reviewed to see which, if any, of the drains in the Lower Upper Grand River watershed have been added. Several of the drains have had relatively recent work and the ECDC has digital files of many, or can easily obtain them from the respective consultants.

1. If a drain is in the GIS, it will be reviewed for completeness.
2. If a drain has had recent work and digital files are available (i.e. AutoCAD), the drain route and course and district boundary will be added to the GIS.
3. If digital files are not available, the GIS system will be updated by manual input of route and course and district boundary.

B. Discharge Points.

Each discharge point has been specifically mapped and documented. See Phase II – MS4 Outfalls to the Grand River Survey Records, May 2013 by Eng., Inc.

1. Each discharge point identification will be added to the County GIS.

III. PRIORITIZING AREAS FOR DRY WEATHER SCREENING

To prioritize areas for dry weather screening, Eaton County will do the following:

A. Solicit input from other agencies.

1. Township and City Engineers.
2. Eaton County Road Commission.
3. Barry Eaton District Health Department.

B. Review complaint records.

C. Review the population density.

D. Review the commercial density.

- E. Rank drains based on recent maintenance activity or proposed maintenance.
- F. Add screening requirements to any active maintenance or petition work.
- G. Review comments and photographs from Task II above for any potential high risk areas.
- H. Develop a five year plan to screen all drains in the COC area.
 - 1. Screen 25 percent per year.
 - 2. Allow the fifth year for any follow up or newly discovered outlets.

IV. PERFORM DRY WEATHER SCREENING

Utilizing trained technicians, 25 percent of all discharge points will be visited each year for the next four years.

- A. At least 48 hours after any precipitation.
- B. The following observations will be documented:
 - 1. Water clarity, color and odor.
 - 2. Presence of suds, oil sheens, sewage, floatable materials, bacterial sheens, algae and slimes.
 - 3. Staining of banks.
 - 4. Unusual vegetative growth.
- C. Year five will be for visits to follow up on any corrective actions or additionally identified discharge points.

V. ILLICIT DISCHARGE SOURCE IDENTIFICATION

- A. Any suspected discharge will be documented and reviewed for follow up. Samples will be obtained within 24 hours and tested for ammonia, fluoride, detergents, e. coli and pH.
- B. The drain in question will be visually inspected for obvious sources.
- C. The appropriate agency will be notified if necessary (City, Township, Health Department).

D. Additional sampling and testing will be performed by the appropriate agency to verify the contaminant.

E. Discharges of contaminants in excess of the threshold reporting quantities in the Part 5 Rules will be reported to the MDEQ.

VI. ELIMINATING DISCHARGES AND PURSUING ENFORCEMENT ACTION

Eaton County will coordinate with the appropriate agency to eliminate any illicit charges. Eaton County does not have emergency spill personnel; local fire departments will be contacted in those cases.

A. Illicit discharges will be documented and a process set up within the County to track the status of each discharge. This process is listed in "Compliance Procedures for Eaton County's National Pollutant Discharge Elimination Program Permit.

B. Follow up visits / inspections will be performed to verify any corrective action.

C. Within the authority of the Michigan Drain Code, Eaton County through the ECDC will take corrective action as necessary.

VII. TRAINING

Eaton County recognizes that an effective IDEP depends on the abilities of the staff or consultants performing the above tasks. To support this activity, Eaton County will:

A. Provide IDEP training opportunities to staff within the ECDC office.

B. Provide IDEP training opportunities to GIS staff.

C. Develop a training program to:

1. Provide initial training to appropriate staff including:

a) The definition of illicit discharges and connections.

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

c) Methods for eliminating illicit discharges and the proper enforcement response.

d) Documentation / GIS and office coordination.

e) Field procedures and safety.

f) Limitations of authority.

2. Provide scheduled training for:

a) New technicians.

b) Refreshers.

- c) Changes in policies or procedures.

VIII. EFFECTIVENESS OF IDEP ACTIONS

Annually, Eaton County will evaluate the IDEP process and the effectiveness of the program:

- A. Are the prioritization goals being met on schedule?
- B. Number of illicit discharges located.
- C. Number of illicit discharges eliminated.
- D. Estimated volume and pollutant load eliminated.
- E. Training goals met.
- F. Corrective action to revise the process or priorities.
- G. Reporting.

The annual review will be documented, placed on file and posted to the ECDC website.

The following IDEP Table 1 – Action Plan summarizes the action items in a spreadsheet format.

**IDEP Table 1 – Action Plan
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TASK	SUBTASK	GOAL	TIMELINE - updates	COMMENTS
II. Mapping	<ul style="list-style-type: none"> A. Base Mapping B. Discharge Points 	<ul style="list-style-type: none"> Input drain info into county GIS Visit, I.D. and input points into GIS 	<ul style="list-style-type: none"> Complete Complete May 2013 	
III. Prioritize Areas for Dry Weather Screening	<ul style="list-style-type: none"> A. Solicit input from other agencies B. Review complaint records C. Review population density D. Review commercial density E. Rank drains based on maint. F. Add screening to active projects G. Review task 2. B., for high risk H. Develop 5-year plan 	<ul style="list-style-type: none"> Contact and follow-up: Townships and Cities Eaton County Road Commission Eaton County Health Department Adopt and implement 5-year plan 	<ul style="list-style-type: none"> Complete May 2013 Complete May 2013 Complete May 2013 Complete May 2013 Complete May 2013 Complete May 2013 Complete May 2013 Complete May 2013 	
IV. Perform Dry Weather Screening	<ul style="list-style-type: none"> B. Visit sites, make observations C. Follow-up, visit additional sites 	<ul style="list-style-type: none"> 25% year 1 25% year 2 25% year 3 25% year 4 Year 5 	<ul style="list-style-type: none"> 2016 2017 2018 2019 2020 	
V. Illicit Discharge Source Identification	<ul style="list-style-type: none"> A. Document suspected discharge B. Visual inspection C. Notify appropriate agencies D. Sample and test as necessary 	<ul style="list-style-type: none"> Identify and locate illicit discharges Identify and locate illicit discharges Identify and locate illicit discharges Identify and locate illicit discharges 		
VI. Eliminate Illicit Discharges and Pursue Enforcement	<ul style="list-style-type: none"> A. Set up tracking system B. Follow-up visits C. Take corrective action 	<ul style="list-style-type: none"> Maintain accurate records Verify corrective action Enforce compliance 		
VII. Training	<ul style="list-style-type: none"> A. Provide IDEP Training to ECDC B. Provide IDEP training to GIS C. Develop on-going training 	<ul style="list-style-type: none"> Provide initial training Provide initial training Maintain trained staff 		
VIII. Effectiveness evaluation	<ul style="list-style-type: none"> A. - E. Evaluate program F. Modify as necessary G. Reporting, post to web site 	<ul style="list-style-type: none"> Maintain accountability 	<ul style="list-style-type: none"> On-going As needed Annually 	