



**COMPLIANCE PROCEDURES FOR EATON COUNTY'S
NATIONAL POLLUTANT DISCHARGE ELIMINATION PROGRAM PERMIT**

Revised February 2016

Eaton County NPDES Compliance Procedures

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Implementation Procedure for Illicit Discharge Detection and Correction

Training

All field employees of the Drain Commissioner's Office will be trained in the detection of illicit discharges to county drains and open waters of the state within one (1) year of becoming employed by Eaton County as required by Eaton County's Certificate of Coverage or NPDES permit. Staff will avail themselves of any additional training opportunities offered through the GLRC or other agency as opportunities arise.

Field staff will be trained to observe conditions of flowing water in both open and enclosed drains for the following conditions:

- 1) The presence of significant flow during a dry weather period when base flow would be expected to be low or non-existent may indicate a connection from a residence or business. In rural areas the investigator should be aware of any springs or seeps which contribute to base flow during dry weather. In that instance, several additional investigations to establish a base line flow for the stream are warranted.
- 2) Contamination often, but not always, affects the clarity and color of water. The investigator should carry a small sampling bottle so these conditions can be clearly observed.
- 3) An oil sheen (not plant based) indicates need for additional investigation. Also the presence of large amounts of foam, trash or floatable material might suggest an upstream landowner is using the drain or stream to dispose of household waste.
- 4) High levels of bacteria can create a reflective sheen on the surface of standing water. The condition is normal in standing water but if observed in moving water, additional investigation may be warranted.
- 5) Enclosed drainage systems where air is not easily introduced to the flowing stream often create an environment where slime grows on the walls of pipes and conduits. This condition by itself is normal although there may be a significant loss of infiltration capacity at joints and perforations. The slime is not normally indicative of a contamination problem.
- 6) If there is significant staining of the vegetation adjacent to a stream or on rocks or pipe walls within a flowing stream (do not confuse lichen and algal growth with staining) the cause must be determined. Scrape solid surfaces to determine if the underlying cause is natural or if the stain is deep enough to suggest a component in the water may be the cause.
- 7) Observe any loss of vegetation, particularly at pipe outlets to open channels. Abnormal loss of healthy vegetation not related to seasonal cycles must be investigated further to determine cause.
- 8) Equally important is excessive vegetative growth, suggesting that nutrients are being introduced to the stream environment. When this condition is observed, all upstream tile outlets should be inspected and tested if warranted.
- 9) Standing water naturally emits an odor. However, if observed after a wet period but before a stream has time to stagnate, follow-up investigations should be conducted.

Emergency Response Procedures

The ECDC operates storm drains according to the Drain code of 1956 (P.A. 40 of 1956). 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."

Drain office field staff will report any irregular discharges to county drains or regulated waters of the state on the attached **Incident Report**. When an illicit discharge is discovered, an incident file containing all documentation must be created. A drain commissioner does not have statutory authority to order correction of a contamination problem outside of a drain right of way. Therefore it is necessary to establish partnerships with other public agencies with authority to address the problem.

The incident report will be forwarded to the appropriate regulatory agency within two (2) business days with a request for confirmation that the problem has been eliminated. In the case of a chemical spill, the problem must be reported immediately.

Until confirmation is received that a contamination problem has been eliminated, the incident file will remain active. All incidents will be reported in annual reports submitted in compliance with the Certificate of Coverage or NPDES permit, and will be evaluated monthly with the appropriate agency. If within the Drain Commissioner's jurisdiction, the property owner will be contacted by mail and instructed to correct the illicit discharge within 5 days. If a process is not established for correction, the issue will be referred to the County Prosecutor for action under Act 40, 280.423 (10).

Types of Contaminant and Response

- For sediment pollution: The report will be forwarded and addressed by an appropriately trained individual for correction under Part 91, Act 451 of 1994, as amended. For sediment pollution, procedures published in Eaton County's Soil Erosion and Sedimentation Control Rules will be followed.
- For suspected *e coli* contamination: The report will be forwarded to the Barry-Eaton District Health Department if the suspected contamination is occurring in an area of the county not served by public sanitary sewers. In locations where public sewers exist, the report will be forwarded to the municipal agency responsible for sewage treatment in the service area.
- For suspected chemical contamination: The 911 Dispatch Center will be contacted immediately with information about size of the spill and the chemical component if known. Maps of stormwater conveyance systems will be provided to emergency responders as appropriate. After the contamination has been removed, a detailed report of the activity will be filed with the Incident Report.
- For trash and other debris: Acting under authority provided by the Michigan Drain Code, the Drain Commissioner shall take steps to remove the offending debris and prevent its transfer to downstream locations in the drainage system.

Note: The schedule and process for follow-up of Illicit Discharges can be found in Attachment 8 of this Application, Illicit Discharge Elimination Plan.

Documentation

The following forms of documentation will be included for all illicit discharge incidents:

- names and contact information for the persons or individuals first reporting the discharge;
- a copy of the Incident Report filled out by an employee of the Drain Commissioner;
- photographs and other evidence;
- a written summary of action taken and by which agency; and
- a statement that the incident has been appropriately addressed and that the file may be closed.

The documents will be available to the DEQ. Certain illicit discharges will be reported to the DEQ District Office as outlined

Retention

The completed incident file shall be retained until the spill and its disposition have been reported as part of the normal permit compliance procedure. Copies of the files will be kept in the Eaton County Drain Commissioners office for a minimum of 3 years.

Eaton County Drain Commissioner's Office
IDEP POLLUTANT INQUIRY INVESTIGATION and INCIDENT REPORT

Date Received: _____	Drain (if any): _____
Address where occurring: _____	Outfall impacted (#): _____
Water body impacted: _____	Type of pollutant: _____

Date Inspected: _____ **By:** _____

Reason for inspection:

Conditions observed (attach sketch/photos if needed):

Sent report to the following authority for response/correction:

Barry-Eaton Health Department **Date Contacted:** _____
_____ **Wastewater Treatment Plant, Date Contacted:** _____

Final Disposition: _____

Contacts and Phone Numbers:

_____ phone: _____
_____ phone: _____

Instructions to recipient: Please notify the Eaton County Drain Commissioner after the pollution incident described above has been corrected, with a brief explanation of actions concluded. Full documentation of all illicit discharges corrected is a required item for compliance with by Eaton County's NPDES permit.