

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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- 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
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- 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:

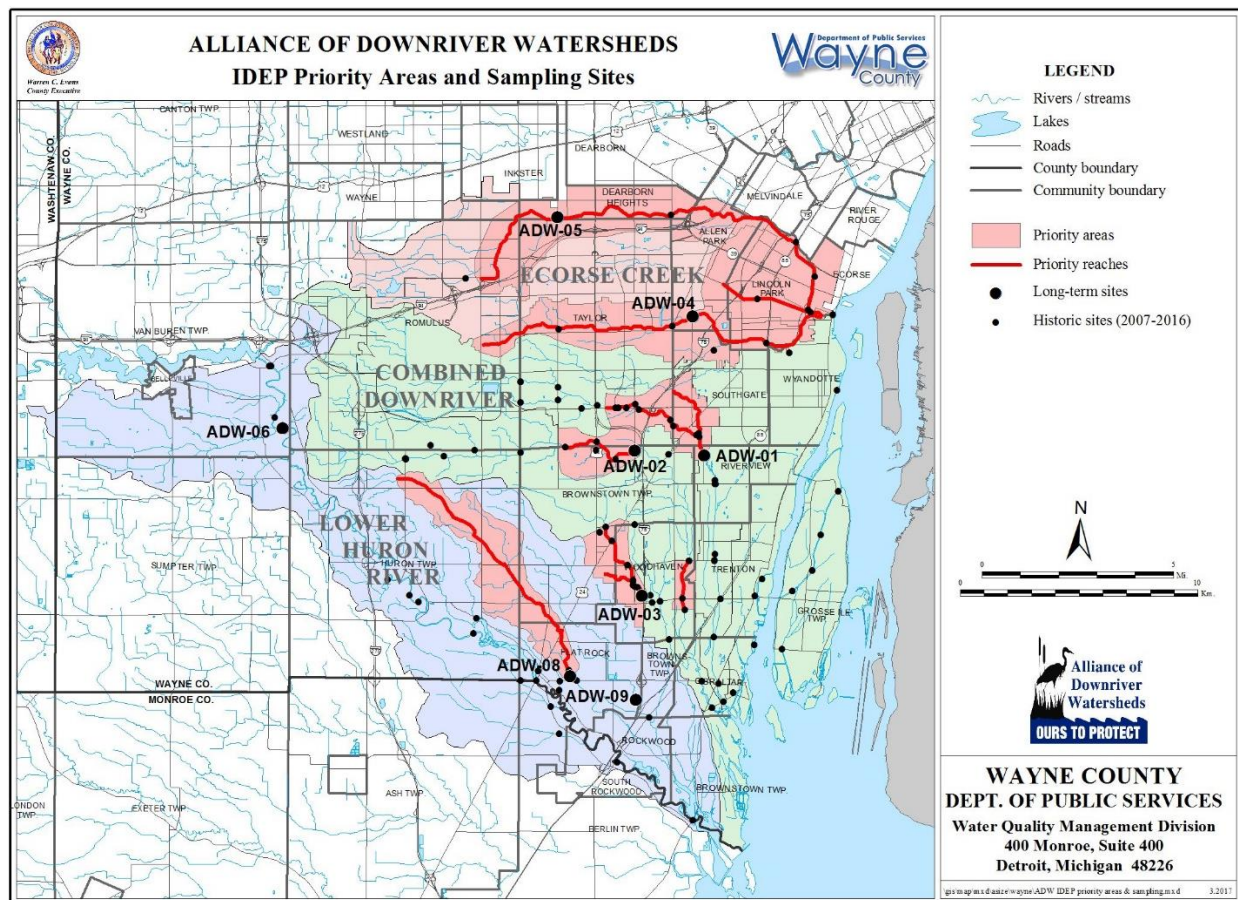
- Multiple events with *E. coli* concentrations in excess of 1,000 cfu/100 mL of water during dry weather
- Dry weather Human *E. coli* (based on MDEQ 2007 BST studies)
- Upstream of known CSO areas
- High mean *E. coli* concentrations from sampling
- Elevated mean total phosphorus levels from sampling
- 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	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. 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 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
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	http://www.waynecounty.com/hhs/onsite_sewage.htm <i>Specifications Governing On-Site Disposal of Sanitary Sewage and Human Excreta as follows:</i> -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 <i>Wayne County On-Site Sewage Disposal Operation and Maintenance Ordinance as follows:</i> -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? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ Yes*
Location of Field Work:		
Date:	Crew:	Suspicious Discharge Observed? ☐ No ☐ 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

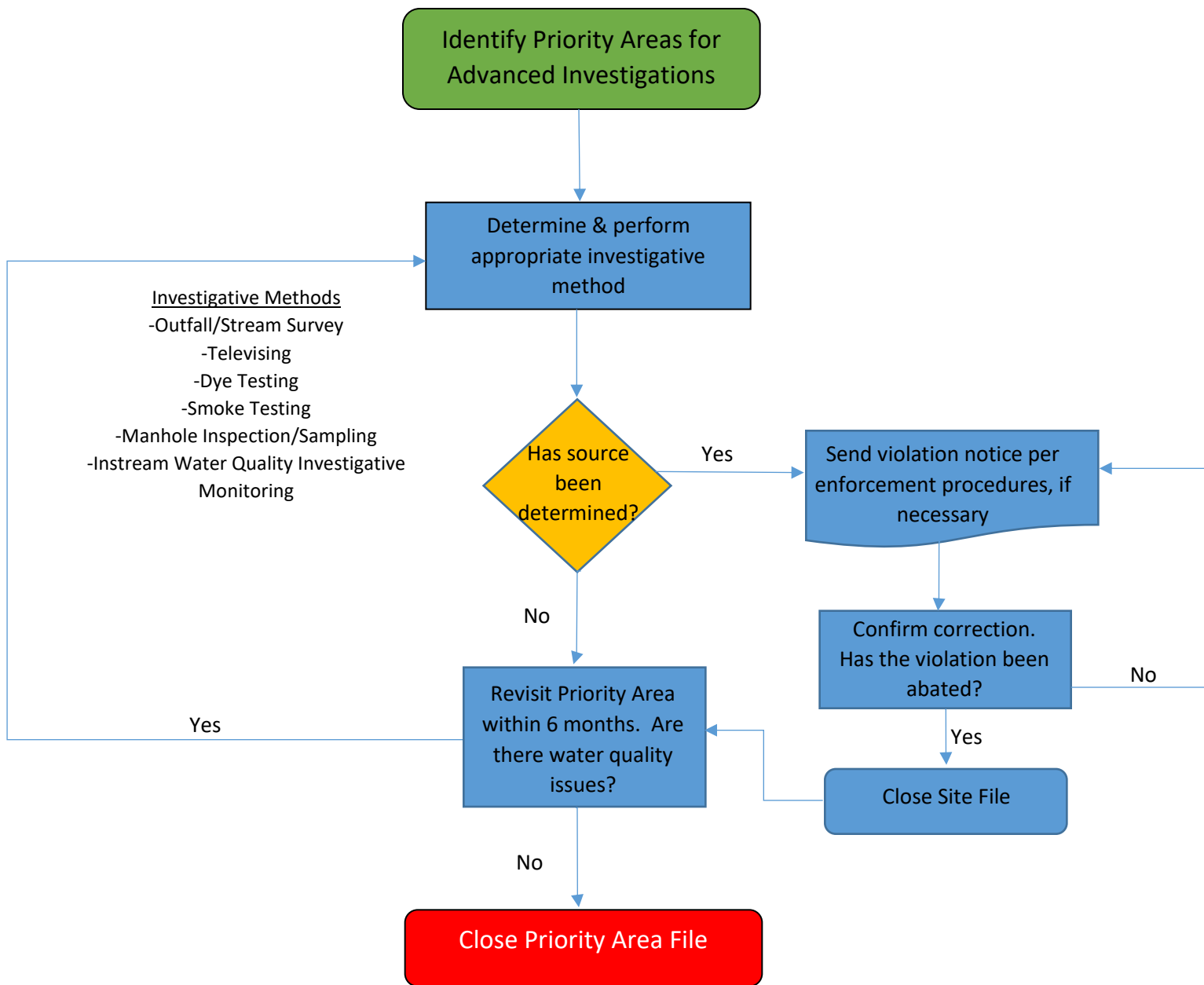
Attachment B

- 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. Mustertovich W. MUSTERTOVICH CHIEF DEPUTY MACOMB 05-17-2013
Signature Name/Title COUNTY PUBLIC WORKS Commissioner Date

Oakland County Representative

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

Saint Clair County Representative

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

Washtenaw County Representative

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

Wayne County Representative

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

SEMCOG Representative

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

Alliance of Rouge Communities Representative

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

Alliance of Downriver Watersheds Representative

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

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
	Library
Gibraltar	Community Center - Annex
	School District Transportation & Maintenance Garage with salt storage
	DPW Building
	Carlson High School/Shumate Middle School
	Parsons Elementary School
Grosse Ile	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 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.

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

12/18/2018

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)	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. Includes continuous release reportable under CERCLA Section 103. 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. Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA. Excludes release < 1000 lbs of NOx released to the air from combustion or combustion-related activities.	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. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release. See 73 FR 76948 (12/18/08): Only CAFOs are required to report continuous releases to the air from animal waste. Transportation related releases can be reported to 911.	As soon as practicable (within 30 days) after release: to LEPC(s) and SERC. Not required for releases that occur during transportation or from storage incident to transportation. For continuous releases: Initial written within 30 days after initial telephone notification: to LEPC(s) and SERC. Michigan SARA Title III Program accepts reports on behalf of the SERC.	PEAS: 800-292-4706 Contact your LEPC for a phone number to report releases. Call 911 if your LEPC is not active. For further information & LEPC contact information, contact Michigan SARA Title III Program 517-284-7272
CERCLA Section 103 40 CFR 302 (Hazardous Substances)	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. Excludes petroleum, including oil, or any fraction thereof. See 40 CFR 302.6 for notification requirements for radionuclide releases. Includes continuous release: occurs without interruption or abatement or that is routine, anticipated, and intermittent and incidental to normal operations or treatment processes. 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. Does not apply to the application, handling, and storage by an agricultural producer of a pesticide product registered under FIFRA.	Immediate (within 15 minutes after discovery): to NRC by person in charge of vessel or offshore or onshore facility. Continuous releases must be identified as such and are reported initially and when there is a significant change in the release. See 73 FR 76948 (12/18/08) re Exemption from reporting continuous releases to the air from animal waste.	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.	NRC 800-424-8802 or online at www.nrc.uscg.mil 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

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	(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. 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. 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.	Within 24 hours after discovery: to DEQ-RRD district office (PEAS after hours) by owner or operator or person holding easement interest. Report agricultural release to MDARD.	Upon request: Provide a response activity plan to DEQ-RRD district supervisor.	PEAS: 800-292-4706 MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 For further information contact DEQ-RRD
NREPA 1994 PA 451 Part 201, Environmental Remediation (Continued)	(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. (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. 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. 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.	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. Specific form required for: "Notice of Migration of Contamination" (Form EQP4482).	Upon request: Provide a response activity plan to DEQ-RRD district supervisor.	For further information contact DEQ-RRD
NREPA 1994 PA 451 Part 83, Pesticide Control Regulation 640, Commercial Pesticide Bulk Storage (Agricultural)	Release to the environment of a commercial pesticide >5 gallons or 100 pounds. Reportable agrichemical 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. The term "release" excludes normal agricultural practices.	Immediate: to PEAS* Also notify NRC for spills reportable under SARA Title III & CERCLA. *MDARD prefers direct notification to their hotline. PEAS forwards all agriculture calls to MDARD.	Within 90 days: to MDARD Pesticide and Plant Pest Management Div. a revised site plan.	MDARD Agriculture Pollution Emergency Hotline: 800-405-0101 PEAS: 800-292-4706 NRC 800-424-8802 or online at www.nrc.uscg.mil For further information contact MDARD 517-284-5644

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)	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. 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. 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.	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. (A reportable incident <i>must</i> be reported by telephone, not online.) For infectious substances, notice may be given to the Director, Centers for Disease Control and Prevention, U.S. Public Health Service instead of NRC.	Within 30 days after discovery: to US DOT on DOT Form F 5800.1 (01-2004) "Hazardous Materials Incident Report." Report online at https://hazmatonline.phmsa.dot.gov/incident/ 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%. See regulation for exceptions to written report.	NRC 800-424-8802 or online at www.nrc.uscg.mil U.S. Public Health Service 800-232-0124 For further information contact US DOT Hazardous Materials Information Center at 800-467-4922 or online at www.phmsa.dot.gov/hazmat
NREPA 1994 PA 451 Part 31, Water Resources Protection (Release to surface of ground, surface water, groundwater or public sewer system)	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. See Part 5 rules, effective 8/31/01, for details and exemptions. HB 5586 effective 6/15/04 amended the reporting requirements. <i>Rule revisions pending as of April 2014.</i>	As soon as practicable after detection: to PEAS <i>and</i> 911 by owner, operator or manager. State agencies call 911 if release reported to them by another state or Canada.	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.	PEAS: 800-292-4706 For further information contact DEQ-WRD

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.

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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

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.

