

OAKLAND COUNTY MS4 ILLCIT DISCHARGE ELIMINATION PROGRAM (IDEP) MAY 2021
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A. Oakland County Stormwater Committee (OCSC)

The OCSC is a multi-departmental group that has formed to develop and implement the Oakland County Phase II Municipal Separate Storm Sewer System (MS4) Stormwater permit program. The OCSC members consist of the following County departments: Water Resources Commissioner (WRC), Oakland County Parks and Recreation Commission (OCPRC) and Oakland County Facilities Maintenance (OCFM).

The Water Resources Commissioner's Office is the lead County department for coordinating the OCSC and is the primary contact for Phase II permit data collection and reporting. The purpose of the OCSC is to provide technical support for departmental programs including developing standardized procedures and mechanisms for data collection and reporting required under the Permit.

The Illicit Discharge Elimination Program (IDEP) for Oakland County is a multi-departmental cooperative program coordinated by the OCSC with each department being responsible for implementation of IDEP programs for their MS4's and facilities under their jurisdiction.

Under this plan, IDEP coverage includes*:

WRC - 369 Open and Enclosed County Drains, and 27 WRC Facilities

OCPRC - 13 County Parks

OCFM - 43 OCFM Facilities located on the County Campus and Satellite Properties

**It should be noted that many of the Oakland County departments implement their IDEP in both MS4 and non-MS4 areas, as well as in urbanized and non-urbanized areas. It is the expectation of each department that compliance with the permit in relation to IDEP applies to the urbanized, MS4 areas first and foremost; the IDEP implemented beyond the permit-related requirements is to be considered going above and beyond.*

A location map and list of County drains and County properties are included in **Appendix A (OC Facility Listing)** and **Appendix B (OC Facilities and UA Map)**.

B. Storm Sewer System Maps and MS4 Outfall and Discharge Point Locations (Permit Application Item #7)

An outfall (O) is defined as a discrete stormwater conveyance system that discharges from the permittee's MS4 to a surface water of the state.

A discharge point (DP) is defined as a discrete stormwater conveyance system that discharges from the permittee's MS4 to another jurisdiction's MS4.

The following inventory has been gathered for the number of known outfalls and discharge points for each department:

	WRC	OCFM	OCPRC
# of Known Outfalls	1,364	78	77
# of Known Discharge Points	104	0	2

Lists of currently inventoried outfalls and discharge points for each department are also attached in **Appendix C**.

Maps of storm sewers and O/DP locations are available through each Department in the following formats:

Table 1: Oakland County MS4 Storm Sewer System Map Locations

WRC	OCFM	OCPRC
<ul style="list-style-type: none"> Available in GIS & CAMS General storm drain maps organized by CVT are available on the WRC Sharepoint site under WRC Quality Management (Published Maps/Index Maps/Storm Drain) Detailed County drain maps for each drain are available digitally on the WRC Sharepoint site under WRC Quality Management (PublishedMaps\Quarter Section Maps\Storm) Note: these maps are updated as changes occur All storm drainage project documents (site plans and correspondence), including active and inactive projects, as well as permits on file with the WRC, are organized by drain name and can be found digitally at: J:\Drain\ProjectDocuments\Storm Drain The IDEP drain maps are located digitally at: J:\Drain\EandC\Environmental\Illicit Discharge Elimination Programs\Outfall Inventory <p>Maps are filed by CVT and Drain Name (on Drains covering Multiple Communities, the Drain file is located in the CVT file where the lower terminus of the drain is located).</p>	<ul style="list-style-type: none"> Available in GIS & CAMS 	<p>Hard copy as-built plans and/or construction plans are available</p>

Table 2: Oakland County MS4 Outfall and Discharge Point Location Maps

WRC	OCFM	OCPRC
<ul style="list-style-type: none"> Available in GIS & CAMS 	<ul style="list-style-type: none"> Available in GIS and CAMS 	<ul style="list-style-type: none"> Available in GIS & CAMS

C. IDEP Prioritization (Permit Application Items #8, 9)

Each Department is responsible for the prioritization and scheduling of IDEP activities based on the following:

Table 3: Oakland County MS4 IDEP Inspection Schedule

WRC	OCFM	OCPRC
<ul style="list-style-type: none"> County Drains: See Alternative IDEP in Appendix I WRC Facilities: All O/DP's to be inspected once per permit cycle, or per facility-specific SWPPP 	<ul style="list-style-type: none"> All O/DP's to be inspected once per permit cycle or per facility-specific SWPPPs 	<ul style="list-style-type: none"> All O/DP's to be inspected once per permit cycle or per facility-specific SWPPPs

D. IDEP Dry Weather Screening (DWS) and Illicit Discharge Investigation (IDI) Procedures (Permit Application Items #10, 11, 12)

Procedures for DWS and IDEP investigations are contained in WRC Work Instruction CDM-0415, "Drain Inspection, Maintenance and Cleaning", and EU-1702, "Procedures for Illicit Discharge Detection and Elimination", and OCPRC's "Illicit Discharge Elimination Program Guidelines", "Dry Weather Screening" section (**Appendix D**). These documents include procedures for:

- O/DP Identification and GIS Mapping
- DWS, Sampling, Data Collection and Data Management
- Illicit Discharge Investigations, Discharge Notification, Reporting and Referrals
- Illicit Discharge Elimination Tracking and Reporting
- Staff Training

Each OCSC department is responsible for implementing these programs.

WRC provides assistance to OCFM in performing DWS and IDI activities on the County campus for outfalls that discharge to County drains. OCFM is responsible for DWS it's O/DP at its satellite facilities but may contract with WRC to complete this work upon request. Each department is responsible for scheduling and tracking DWS and IDI activities and reporting on these annually to the OCSC for inclusion in permit reports submitted to the Michigan Department of Environment, Great Lakes and Energy (EGLE) as per the following:

Table 4: IDEP DWS & IDI Schedules

	WRC	OCFM	OCPRC
Responsible Department	WRC	WRC - County Campus OCFM - Satellite Facilities	OCPRC
DWS schedule	See Alt IDEP	Once Per Permit cycle or per facility-specific SWPPP's	Once Per Permit cycle or per facility-specific SWPPP's
IDI Schedule	See Alt IDEP	As needed	As needed
Reporting Frequency to WRC	Annually	Annually	Annually

E. Complaint Response and Follow-up Investigation (Permit Application Items #13, 14)

Procedures for complaint response and follow-up investigation are contained in WRC Work Instruction EU-1700, “Surface Water Pollution Complaints”, and OCPRC’s Surface Water Pollution Response” (**Appendix E**). These documents include procedures for:

- Complaint intake
- Complaint response
- Complaint investigations, notification, reporting and referral
- Complaint tracking and reporting
- Staff training
- Community outreach and public education

In addition, WRC operates a 24-Hour Pollution Hotline for Surface Water Complaints [(248) 858-0931]. The intent is for citizen reporting of pollution to surface waters throughout Oakland County (see attached WRC Hotline Brochure, **Appendix F**). Significant spills of hazardous or polluting materials are also reported to the EGLE Pollution Emergency Response System (PEAS) [1-800-292-4706]. In addition, the OCSC has a brochure for municipal and county departmental staff to use as a tool for their in-house illicit discharge detection and reporting training (see attached IDEP Handout, **Appendix G**).

Complaint reporting and follow-up investigation for each OCSC department are summarized in Table 5.

Table 5: Departmental Staff, External Agency and Citizen Complaint Response & Investigation

Element	WRC	OCFM	OCPRC
Internal staff referrals/response Follow-up investigations and reporting	EU-1700 and EU-1702 as it applies to WRC Facilities and Properties, and County Drains Track Annually	Will notify WRC of issues on OCFM Facilities and Properties Report to WRC Annually	OCPRC “Surface Water Pollution Response” and “Illicit Discharge Elimination Program Guidelines” as it applies to OCPRC Facilities and Properties Report to WRC Annually
External complaints response	Complaints outside WRC jurisdiction referred to the appropriate agency or CVT	N/A	N/A
Follow-up IDEP investigations and reporting	EU-1700 and EU-1702 Follow-up Investigations on County Drains Track and report on progress	N/A	N/A

	Annually		
Citizen reporting	24-Hour Pollution Hotline (248) 858-0931 https://www.oakgov.com/water/stormwater/Pages/environmental.aspx	N/A	N/A

F. Procedures for Spill Release and Reporting (Permit Application Item #15)

Procedures for spill response, notification and reporting are contained in WRC Procedure, P-043, "Spill Response Procedure" (**Appendix H**), and OCPRC's "Surface Water Pollution Response" (**Appendix E**). WRC responds to spills of hazardous and polluting materials to County drains discovered during IDEP investigations and from citizen complaint reporting. Procedures are in place for initiation of emergency spill response and reporting with local Fire Departments, Oakland County HazMat, EGLE and the NRCS. Additionally, all appropriate OCSC departments have spill response, notification and reporting requirements in place as required per facility-specific Spill Prevention, Control and Countermeasure (SPCC) and Pollution Incident Prevention Plans (PIPP) and are familiar with the Oakland County Emergency Response and Preparedness Plan.

Table 6: Spill Response Training, Notification and Reporting Requirements

Requirement	WRC	OCFM	OCPRC
First Responder / Hazard Communication (29 CFR § 1910.120)	X	X	
SPCC - NRCS Reporting (40 CFR Part 112)	X	X	X
PIPP - EGLE PEAS Reporting (Part 31 Part 5 Rules)	X	X	X
OC Emergency Response Procedures	X	X	X
Local Fire Dept. – 911	X	X	X

NOTE: Should the release of any polluting materials from the MS4 to the surface waters or groundwaters of the State occur and is beyond the threshold for reporting as identified in the [Part 5 Rules](#), the MS4 owner shall notify the EGLE Water Resources Division – Warren District Office during business hours at 586-753-3700, or if after hours, call the EGLE's 24-Hour PEAS hotline at 800-292-4706. In addition, 911 should be called so the appropriate local fire department or HAZMAT team can respond.

G. Illicit Discharge Identification and Investigation Alternative Approach (Permit Application Item #16)

WRC has opted for an alternative approach to implementation of its IDEP (see **Appendix I**) on County Drains. The IDEP on OCPRC, OCFM, and WRC properties and facilities are conducted using the traditional IDEP approach.

Table 7: Summary of Oakland County MS4 IDEP Approaches

WRC	OCFM	OCPRC
County Drains	OCFM Facilities	OCPRC Facilities
Alt. IDEP (see Appendix I)	Traditional IDEP	Traditional IDEP

WRC Facilities Traditional IDEP: All Outfalls & DPs screened once per permit cycle or per facility-specific SWPPP Schedule IDI as needed	All Outfalls & DPs screened once per permit cycle or per facility-specific SWPPP Schedule IDI as needed	All Outfalls & DPs screened once per permit cycle or per facility-specific SWPPP Schedule IDI as needed
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H. Illicit Discharge Elimination Procedure (Permit Application Item #17)

Illicit discharge elimination procedures are outlined in WRC Work Instruction EU-1702, "Procedures for Illicit Discharge Detection and Elimination", Sect. 5.5, and P-043, "Spill Response Procedure", Section 6.4 (Response), and OCPRC's "Illicit Discharge Elimination Program Guidelines" and "Surface Water Pollution Response" (see **Appendices D and H**, respectively).

All OCSC departments are responsible for illicit discharge elimination and corrective actions on County properties and facilities. WRC is responsible for elimination of illicit discharges to County Drains either directly through drain permits or by working with property owners, local communities, the Oakland County Health Department, and other regulatory agencies, as appropriate, to locate and eliminate the discharge sources outside of their jurisdictional authority.

The County notifies the responsible party (if outside of its jurisdiction) of the need to correct the illicit discharge within 24 hours of becoming aware of the illicit discharge.

There is not a specific schedule for elimination of illicit discharges in the permit application as each illicit discharge will have a varying schedule for corrective actions based on the location of the illicit discharge source, the jurisdictional authority responsible for enforcement and the complexity of eliminating the source of pollution involved.

Illicit discharges discovered at County facilities are addressed immediately by the departmental IDEP coordinator, facility manager and departmental managers. Schedules for corrective actions may vary based on the type and quantity of pollutants involved, location and type of illicit discharge source, complexity of corrective actions and compliance with any local, state or federal regulations involved; however, all efforts are made to have the illicit discharge eliminated within 90 days. Individual County departments are responsible for tracking the status of illicit discharges at their facilities and reporting on the progress of illicit discharge elimination to the OCSC for inclusion in biennial stormwater progress reports to the EGLE.

Illicit discharges to County drains are investigated by WRC and discharges outside of WRC jurisdictional authority are handled by the local community, or other MS4 permitting authority connected to the County drain system. WRC does not have regulatory authority over private property. WRC can issue illicit discharge notifications under their permitting authority, but illicit discharge elimination is usually referred to and handled by at least one or more regulatory or enforcement agencies under their respective enforcement programs. Schedules for elimination and correction of illicit discharges will vary depending upon the enforcement mechanisms and time frames established by those agencies.

Table 8: Illicit Discharge Elimination Responsibilities

WRC	OCFM	OCPRC
Discharge elimination on WRC properties & facilities per applicable regulations, codes and ordinances Permit/eliminate discharges within WRC's jurisdictional authority Assist local communities & regulatory agencies with discharge elimination outside WRC's jurisdictional authority	Discharge elimination on OCFM properties & facilities per applicable regulations, codes and ordinances	Discharge elimination on OCPRC properties & facilities per applicable regulations, codes and ordinances

I. IDEP Training and Evaluation (Permit Application Item #18)

Appropriate OCSC departmental staff is trained on the various elements of the Phase II Stormwater Permit and IDEP Requirements. Training programs, requirements and mechanisms vary from County-wide training to individualized training for specific IDEP tasks and procedures. The OCSC coordinates developing training programs, identifies training needs and resources, disseminates training materials and coordinates reporting on training activities. Each stormwater manager for each department within the OCSC is responsible for seeing that staff is appropriately trained and departmental training activities are reported to WRC annually. Table 9 lists the various types of training that is associated with the IDEP program.

Table 9: IDEP Training Summary

Training Program / Topic	Target Staff / Audience	Training Mechanism	Frequency
General Stormwater Pollution Prevention Awareness	General Staff	Handouts / Website	Once per permit cycle; within one year for new hires
Illicit Discharge Identification and Reporting	Maintenance staff and field Inspectors	Training Session / Handout	Once per permit cycle; within one year for new hires
Advanced IDEP Investigator Training	Assigned IDI inspectors	Regional IDEP Class, OJT	Once per permit cycle
Part 31 Storm Water Operator Training	IDEP Coordinators, SWPPP Managers	EGLE Stormwater Operator Re/Certification	Recertification every 5 years
Part 91 SESC Inspector Training	WRC SESC Program Inspectors	EGLE Stormwater Operator Re/Certification Class	Recertification every 5 years
First Responder / HAZWOPPER Training	WRC Spill Responders & Supervisors	Dept. Training Class	Annually

Training Program / Topic	Target Staff / Audience	Training Mechanism	Frequency
SWPPP / SPCC / PIPP / BMP Training	Facility-specific Managers, Supervisors & Spill Response Staff	EGLE Stormwater Operator Re/Certification Class or in-house training session	Recertification every 5 years; once per permit cycle; within one year for new hires

J. Procedure for Evaluating the Effectiveness of the IDEP (Permit Application Item #19)

The effectiveness of the IDEP is evaluated annually and included in the reporting to WRC each year. This information is reported biennially to EGLE. An evaluation of the overall effectiveness of the IDEP is based on the following:

Table 10: Summary of the Evaluation of the Effectiveness of the IDEP

Criteria	Display	Evaluation Method
No. of Outfalls and DP's DWS vs. No. of DWS resulting in Illicit Discharge Discovery	Percent	Total No. % Increase/ decrease annually
No. of Complaints vs. Complaints resulting in Illicit Discharge Discovery	Percent	Total No. % Increase/ decrease annually
No. of Illicit Discharges Found Vs. No. of Illicit Discharges Corrected	Percent	Total No. % Increase/ decrease annually
Estimate of Amount of Pollutants Removed via IDEP	Quantity	Type and Quantity % Increase/ decrease annually

K. Regulatory Mechanisms for Illicit Discharge Investigation and Elimination (Permit Application Items #20-26)

The WRC has permitting authority under the Michigan Drain Code and is able to investigate and permit or require the elimination of illicit connections and direct discharges to County Drains within its jurisdictional authority; however, WRC does not have regulatory authority to investigate or enforce corrective actions to eliminate illicit discharges from public and private property or entering County Drains indirectly through local public or private storm drains. The WRC works with local community authorities, private property owners, the Oakland County Health Department and other State and Federal regulatory agencies for investigation and elimination of illicit discharge sources outside of their respective jurisdictions. A summary of the regulatory authority used for the investigation and elimination of illicit discharges appears in Table 11.

WRC also has permitting and enforcement authority under Part 91 Soil Erosion and Sedimentation Control (SESC) Programs to address runoff from construction sites within their jurisdiction.

The OCPRC and OCFM are not regulatory agencies and do not have regulatory authority, but have the responsibility of eliminating illicit discharges from properties and facilities under their authority and for meeting all State, County and local regulations and requirements for corrective actions.

As part of its IDEP, the WRC will not consider the following to be illicit discharges if they are identified as not being significant sources of pollutants to Waters of the State or a significant contributor to violations of Water Quality Standards:

1. Discharge and flows from firefighting activities

2. Discharge and flows from:
 - a. Water line flushing and discharges from potable water sources
 - b. Landscape irrigation runoff, lawn watering runoff, and irrigation waters
 - c. Diverted stream flows and flows from riparian habitats and wetlands
 - d. Rising groundwaters and springs
 - e. Uncontaminated groundwater infiltration and seepage
 - f. Uncontaminated pumped groundwater, except for groundwater cleanups specifically authorized by NPDES permits
 - g. Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
 - h. Air conditioning condensation
 - i. Waters from non-commercial car washing
 - j. Street wash water
 - k. Dechlorinated swimming pool water from single, two, or three family residences. (Note: A swimming pool operated by OCPRC shall not be discharged to a separate storm sewer or to surface waters of the state without NPDES permit authorization from EGLE)

Table 11: Summary of Regulatory Authority Used for Investigation and Elimination of Illicit Discharge Sources

Discharge Type or Source	Agency	Regulatory Authority
Permitting authority, Prohibited discharge of sanitary sewage and waste matter into County Drains	WRC	<p>Discharge of polluting materials to a waterway that is under the jurisdiction of the Water Resources Commissioner will be considered pollution to a county drain and hence a violation of Section 280.423 of the Michigan Drain Code of 1956, as amended. Under the Michigan Drain Code, pollution of a county drain is a criminal misdemeanor and punishable by a fine of \$25,000 or imprisonment.</p> <p>See Items 1-10 of Chapter 18, Section 280.423 of the Michigan Drain Code at: http://legislature.mi.gov/doc.aspx?mcl-280-423</p> <p>See also Section 280.421: Obstructions; removal; expenses, notice; livestock; criminal complaint of Chapter 18 of the Drain Code at: http://www.legislature.mi.gov/%28%28fpcedzixcmfe3wvtvqmyto3x%29%29/mileg.aspx?page=getObject&objectName=mcl-280-421. Cleanup that is needed due to pollution in a</p>

Discharge Type or Source	Agency	Regulatory Authority
		drain that results in a lessening of the area of the drain can be determined to be an obstruction. The person causing said obstruction is liable for the expenses incurred by the Drain Office to mitigate that obstruction.
Soil Erosion from Construction Sites	WRC – CEA and APA Local MEA and EGLE Authority	Part 91, Soil Erosion and Sedimentation Control (SESC), of NREPA, Public Act 451 of 1994
Unlawful Disposal of Sewage and Industrial Wastes, Onsite Sewage Disposal (OSDS)	Oakland County Health Division	Oakland County Sanitary Code - Article III, Sect 2.1-2.2 Public Health Code, Public Act 306 of 1927, Sect. 327.201
Illicit connections of sanitary sewage from public and private properties	Local DPW / Building Depts.	Michigan Construction Code: Public Act 230 of 1972, MCL 125.1504. Chapter 3 Sect. 301.3 & Chapter 7 Sect. 701.2 or by local ordinance
Discharges from Mobile Home Parks	MDLEG	Mobile Home Commission Act Public Act 96 of 1987
Discharges to surface of ground, surface water, or public sewer system, Discharges from Part 5 Rules and Industrial NPDES regulated facilities	EGLE-WRD (PEAS Notification)	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
See “Release Notification Requirements in Michigan” for: 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	EGLE - WRD & RRD, US EPA, US Coast Guard, NRCS, US DOT, MSP, Local PD, Local Fire Dept., LEPC, LARA, MDARD, Local Health Dept., and CDC	See “Release Notification Requirements in Michigan”, Appendix J , for Appropriate Regulatory Authority