

# **ILLICIT DISCHARGE ELIMINATION PLAN**

**FOR**

**Hartland Township**



**PREPARED IN COMPLIANCE WITH  
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
PHASE II STORM WATER REGULATIONS  
GENERAL STORM WATER PERMIT  
MIG619000**

**and**

**CERTIFICATE OF COVERAGE  
MIG610197**

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## **Hartland Township Contact**

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# *Section I - Plan Objectives*

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## **Illicit Discharge Elimination Plan (IDEP) Objectives**

This document describes Hartland Township's plan for identifying and eliminating illicit connections and discharges to the Waters of the State in its jurisdiction. The Township has agreed to cover the Hartland Consolidated School District under its Certificate of Coverage (COC), and this plan applies to that District's facilities that lie within the Township.

This plan has been developed to fulfill the requirements for Part I. Section A.3.a. of the State of Michigan's National Pollutant Discharge Elimination System (NPDES) General Permit (MIG619000) for Storm Water Discharges from Separate Storm Water Drainage Systems (MS4s) with Watershed Plans and the Certificate of Coverage, MIG610197 that was issued to Hartland Township on December 8, 2003 under the General Permit. The Township is participating in the South Branch Shiawassee River Subwatershed Group. The group is being facilitated by the Livingston County Drain Commissioner (LCDC), and the plan was developed in collaboration with the LCDC and the other subwatershed partners: Deerfield Twp, Hartland Twp, Howell Twp, City of Howell, Marion Twp, Oceola Twp, Tyrone Twp, and the Livingston County Road Commission (LCRC).

The Township also has property within the Huron River Chain of Lakes subwatershed group and the IDEP will be implemented Township-wide. The Hartland Consolidated School District has facilities in Brighton Township and the School District is making separate arrangements for coverage in those communities.

The purpose of the IDEP is to develop a program to prohibit and effectively eliminate illicit discharges and connections to storm water conveyances within the Township. The Federal Phase II storm water regulations define "illicit discharge" and "illicit connection" as follows:

Illicit discharge - the discharge of untreated sanitary wastewater (including industrial and commercial wastewater) or other polluting materials into a river, stream or other water body from: improper sewage connections - such as sources of sanitary sewage which should be connected to the sanitary sewer but are inappropriately connected to the storm sewer; effluent from improperly designed and/or operated septic systems; sanitary sewer overflows; improper disposal of waste products - such as emptying a mobile home holding tank into a catch basin or pouring used motor oil into a catch basin; other discharges not composed entirely of storm water (except as specified in the permit).

Illicit connection - an improper physical connection of illicit discharges to the storm water drainage system, or other connections not authorized by the local authority (where required), to the storm water drainage system. Examples of illicit connections are: a) a floor drain in an automobile repair shop that is connected to the storm sewer rather than the sanitary sewer; and b) a septic tank discharge line that has been connected to the storm sewer. An improper connection of a source of storm water to the sanitary sewer would also be considered an illicit connection, for example, a parking lot catch basin that is tapped into the sanitary sewer. Illicit connections refer to a physical connection to the drainage system that either: Primarily conveys illicit discharges into the storm sewer system, or is not authorized or permitted by the local authority, if required.

The Township does not own or operate any MS4s. As such, the objectives of this IDEP are to:

- 1) Determine ownership of significant storm water conveyances in the Township, and when appropriate, petition the LCDC to accept jurisdiction over any “orphan” drains,
- 2) Train appropriate Township staff on the recognition of illicit connections and discharges, including those from on-site disposal systems (OSDS), safety issues and natural occurring phenomenon,
- 3) Advise the proper jurisdictions or property owners of illicit discharges and connections and failed OSDS that may be discovered by Township staff,
- 4) Work with the LCDC and other agencies such as the Livingston County Department of Health (LCDPH) to develop a County-wide complaint response and referral system for storm water/water quality related complaints,
- 5) Work with the LCDC and LCDPH in their efforts to develop and implement an OSDS inspection program,
- 6) Coordinate IDEP implementation efforts with the other communities and impacted County agencies, and
- 7) Develop legal authority to eliminate illicit discharges and connections to any MS4s that may be constructed in the Township in the future.

## ***Section II - Community Background***

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### ***A. General Information***

The Township covers approximately 36 square miles in eastern Livingston County. Originally established as an agricultural center, the Township was incorporated in 1836. Exhibit A is an aerial photograph of the Township with the jurisdictional limits shown in red.

The center of its business district is at M-59 and US-23. The Township has a total population of 10,940 as determined in the 2000 census. 12.42 square miles of the Township falls within the “urbanized area” and the storm water regulations apply to all the public separate storm sewer systems within the Township limits.

Some major employers in the Township are the Hartland Consolidated School District, Hartland Township Offices, LDM Technologies, Spiral Industries, Dynamic Technologies and the Shops at Waldenwoods.

Rolly Olney II has been appointed as Storm Water Program Manager by the Township and is responsible for implementation of the plan and compliance with the General Permit and COC. He can be contacted at (810) 632-7498 or by e-mail at [Rolney@hartlandtwp.com](mailto:Rolney@hartlandtwp.com).

## **B. *Nested Jurisdictions***

The School Districts that have schools or facilities within the Township include the Hartland Consolidated School District. The Township has agreed to cover the Hartland Consolidated School District under its COC.

The Hartland Consolidated School District consists of one high school, one middle school, three elementary schools and four administration buildings. The high school, middle schools and the elementary schools, as well as the administration buildings are within the limits of Township. The elementary school, high school and middle school have campus type layouts with separate storm sewers. All the campuses have potential for contamination of storm water runoff from large parking lots and maintenance operations at the facilities, grounds and athletic fields, and thus will be the focus of IDEP efforts.

The high school is located at 10635 Dunham Road which houses 1645 ninth through twelfth grade students and the middle school at 3250 Hartland Road serve the district's 901 sixth through eighth graders and the elementary schools at 3480 East St., 11550 Hibner and 10632 Hibner serve the district's 1460 first through fifth grade students.

## **C. *Storm Water Drainage and Sanitary Waste Disposal***

The majority of the land use in the Township is agricultural/residential and most is zoned Conservation Agriculture and Residential of some type. For example, nearly 22,178 of acres of agricultural/residential area is within the Township limits (see Exhibit B, zoning map for the Township located in the appendix). There are also approximately 340 acres of Commercial and Office Service areas. About 75% of the Township residences are being served by on-site sewage disposal systems (OSDS).

The Township does not own or operate any MS4s. The separate storm sewer system in the Township consist of storm drainage systems under the ownership and/or jurisdiction of several different entities, namely, the LCRC, the LCDC, MDOT and subdivisions. The number of miles and locations for these MS4s will be detailed in the individual IDEP's for each agency.

# ***Section III - Planned Efforts***

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The following subsections summarize the four required elements of an IDEP as specified in Part I, Section A.3.a of the MDEQ Watershed Option General Storm Water Permit (MIG619000) and the Township's plan for addressing each element. The Township is committed to beginning the IDEP upon MDEQ approval or within 90 days of final submittal, and to completing activities to meet each of the required elements within five years of COC issuance. The actions completed will comply with the regulations and meet plan objectives. The planned actions are summarized and tabulated in Section IV of this plan. The Township's IDEP will be reviewed during preparation of the annual report to the MDEQ to determine if modifications are needed. The MDEQ will be advised of any changes in the plan.

For the purposes of this program “**outfall**” and “**point source**” are defined as a location where the storm water from a separate storm water conveyance under the jurisdiction of the Township passes into a water

body, wetland, upland or into a conveyance or property under the ownership or jurisdiction of an entity other than the Township. “**Significant Illicit Discharge**” is a discharge that shows evidence of impairing water quality in the receiving water.

The Township believes that adequate public education and resident involvement is essential for protection and enhancement of our natural resources. For an IDEP to be effective there needs to be an ongoing Public Education Plan that meets the objectives for the community. The Township plans to coordinate its IDEP with its Public Education Plan to develop target audiences and messages.

*1. Develop and implement a program to find and eliminate illicit discharges and illicit connections found during dry weather screening.*

**Task 1.01:** **Visual dry-weather inspection of the storm water outfalls at the Hartland Consolidated School District owned offices/facilities, follow-up investigation and correction of any problems.**

**Description:** The Township will inspect the outfalls of any storm water conveyances at the School District’s owned facilities to identify any illicit discharges or connections. Any problems found will be corrected within 90 days of discovery or by other appropriate schedule.

Dry weather inspections are defined as those conducted when no rain/precipitation event has occurred for a minimum of 48 hours. If flow is observed in the sewer at that time, it will be determined if the flow is natural base flow or a possible illicit discharge. In instances where the outfall is submerged, the outfall is directed to another enclosed sewer or otherwise inaccessible, the Township will visually inspect the nearest accessible upstream location.

All storm water outfalls discharging during dry weather will be investigated further. The Township may be able to locate the source of an illicit connection/discharge solely through visual observation. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may lead to the source of a problem without additional sampling. As needed, sampling, dye and/or smoke testing, as-built plan review, or other investigative techniques will be used to determine the nature and source of the flow.

These inspections will be repeated every five years or by other appropriate schedule approved by MDEQ.

**Responsibility:** Township Services Department

**Measure:** Records of inspections and corrections

**Schedule:** Complete inspections and corrections in 2<sup>nd</sup> year

The Township may choose to analyze the samples for some or all of the following parameters:

Parameters	Found In	Potential Source(s)
<i>Escherichia coli</i>	Sewage	<b>Human or Animal Waste</b>
Surfactants	Soap, Emulsifiers	<b>Industrial/Commercial/ Residential</b>
Ammonia	Sewage, Fertilizers, Industrial Chemicals	<b>Industrial/Residential/ Agricultural</b>
Nitrates	Sewage, Fertilizers, Industrial Chemicals	<b>Fertilizers/ Industrial/ Residential/Agricultural</b>
Nitrites	Sewage, Fertilizers, Industrial Chemicals	<b>Fertilizers/ Industrial/ Residential/Agricultural</b>
Conductivity	Industrial Waste, Sewage, Salt	<b>Industrial/ Residential/ Agricultural</b>
Total Dissolved Solids	Industrial Waste, Sewage, Salt	<b>Industrial/Residential/ Agricultural</b>
Temperature	Cooling Water, Sewage	<b>Industrial/ Residential</b>
pH	Acids and Bases	<b>Industrial/ Residential</b>

1. As-built plan review - Where available, the Township will utilize as-built pipe schematic drawings as a tool to determine the source of an illicit connection/discharge.
2. Dye or smoke testing - The Township will conduct physical inspection of commercial and/or residential facilities as needed to verify suspected illicit connections that are detected through visual observations/sampling of yards, outfalls and manholes. As necessary, facility inspections will include dye or smoke testing of suspect facility plumbing fixtures to determine if the fixture discharges to the sanitary system or to the storm sewer. All facility inspections will be documented.
3. Televising - The Township may elect to televise those enclosed storm sewers that have suspicious flows to identify pollutant sources that cannot be located through simple visual observation and/or sampling. For example, the Township may determine through visual observation and/or sampling that an illicit connection exists between two specific manholes. Video inspection of the stretch of storm sewer between these two manholes could be used to isolate the exact source of the connection/discharge.
4. The Township may elect to conduct wet weather observations of some outfalls to determine if runoff from certain areas is contaminated. For instance, oil sheen at the outfall may indicate illicit disposal of oils or grease upstream in the service area. All outfall inspections will be documented.

**Responsibility:** Department of Township Services

**Measure:** Number of illicit connections/discharges traced and documentation of notification and elimination.

**Schedule:** Begin in 2<sup>nd</sup> year and continue until all illicit connections are traced.

**Task 1.02: Follow-up Enforcement for Non-correction**

**Description:** The Township will follow up with the owner of the source of an illicit discharge that is going directly to a drain to ensure that the connection/discharge has been eliminated. If the illicit discharge has not been eliminated, the Township will use its legal authority to obtain compliance. If the illicit discharge is an indirect source, the Township will coordinate follow-up and enforcement with the jurisdiction in which the discharge originates.

**Responsibility:** Township Services Department

**Measure:** Documentation of enforcement actions. Number of illicit connections/discharges found vs. number eliminated.

**Schedule:** Begin in 2<sup>nd</sup> year after legal authority is developed and continue as needed.

**Task 1.03: Coordination with the MDEQ**

**Description:** The Township will report any identified significant illicit discharges including those of untreated or partially treated sewage to the MDEQ within 24 hours after the discharge begins or is discovered and of corrective actions being taken to eliminate the connection/discharge. The reports will cover the information required by the General Permit and Certificate of Coverage. If the discharge is of sewage, the Township will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended including the notification of the local health department and daily newspaper and the use of the MDEQ web-based form ([www.deq.state.mi.us/documents/deq-swq-csosso-eqp5857.doc](http://www.deq.state.mi.us/documents/deq-swq-csosso-eqp5857.doc)).

The Township will submit an annual report to MDEQ summarizing the activities completed including illicit connections and discharges Township identified and corrected. For significant illicit discharges, the Township will list the pollutants of concern, the estimated load and volume discharged, and the locations of the discharge into the system and to the waters of the state. For unresolved sewage discharges, the report will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended.

**Responsibility:** Department of Township Services

**Measure:** Copy of the referral and/or annual report

**Schedule:** 1st year and ongoing

**Task 1.04: Provide training to appropriate Township staff, Boards and Commissions on illicit connections and discharges, including failed OSDS, safety issues and natural occurring phenomenon. Determine the feasibility of coordinating this training with the other agencies and the local communities in the County.**

**Description:** The Township will attempt to coordinate IDEP training with the other local communities and the LCDC, LCRC, LCDPH, etc. As an individual or coordinated effort, the Township will provide training on illicit connections and discharges, including failed OSDS to the appropriate agencies.

**Responsibility:** Department of Township Services

**Measure:** Meeting minutes, conclusions and recommendations. Training records.

**Schedule:** Complete in 2<sup>nd</sup> year

**Task 1.05:** **Review existing legal authority to implement the IDEP.**  
**Description:** The Township must have adequate legal authority and enforcement capability to allow it to find, track and eliminate illicit connections. The Township will conduct a thorough review of its existing legal authority to ensure it is adequate.  
**Responsibility:** Department of Township Services  
**Measure:** Documentation of review and written recommendations  
**Schedule:** Review complete in 1<sup>st</sup> year

**Task 1.06:** **Develop adequate legal authority.**  
**Description:** If needed, based on the recommendations of Task 1.5 adequate legal authority will be developed to allow the Township to implement the IDEP within its jurisdiction and School District. The Township will conduct a thorough review of its existing ordinance, and amend it as necessary, to ensure that:

- The ordinance adequately defines illicit connections and discharges;
- The ordinance prohibits illicit connections and discharges;
- The Township has adequate legal authority to investigate suspected illicit connections and discharges;
- The Township has adequate legal authority to require elimination of illicit connections and discharges;
- The Township has adequate enforcement capability.

**Responsibility:** Department of Township Services  
**Measure:** Documentation of adoption of amendments  
**Schedule:** Adoption complete in 2<sup>nd</sup> year

**Task 1.07:** **Develop a complaint receipt and response system.**  
**Description:** The Township will work with the LCDC and the other communities in the watershed to develop a County-wide system to receive and track complaints regarding storm water, construction site and OSDS issues in the County. The use of any existing systems such as the computerized complaint tracking system that is used by the LCDPH will be investigated. The Township will advertise the complaint system telephone number and e-mail address through various means such as newspapers, posters, mailings, web sites, etc.  
**Responsibility:** Department of Township Services  
**Measure:** Documentation of development and use of the system  
**Schedule:** Complete in 1<sup>st</sup> year

**Task 1.08:** **Notify proper jurisdictions of illicit discharges or connections found by Township staff.**  
**Description:** During the course of normal business, staff of the Township may observe illicit connections or discharges that are not under the Township's jurisdiction. The Township will notify the owner or agency with jurisdiction of the problem in writing. The Township will report any identified significant illicit discharges including those of untreated or partially treated sewage to the MDEQ within 24 hours after the discharge begins or is discovered and of corrective actions being taken to eliminate the connection/discharge. The reports will cover the information required by the General Permit and Certificate of Coverage.. If the discharge is of sewage, the Township will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended including

the notification of the local health department and daily newspaper and the use of the MDEQ web-based form ([www.deq.state.mi.us/documents/deq-swq-cosso-eqp5857.doc](http://www.deq.state.mi.us/documents/deq-swq-cosso-eqp5857.doc)).

The Township will submit an annual report to MDEQ summarizing the activities completed including illicit connections and discharges the Township identified and corrected. For significant illicit discharges, the Township will list the pollutants of concern, the estimated load and volume discharged, and the locations of the discharge into the system and to the waters of the state. For unresolved sewage discharges, the report will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended.

**Responsibility:** Department of Township Services  
**Measure:** Documentation of the notification  
**Schedule:** On-going

**Task 1.09:** **Enter into an agreement with Hartland Consolidated School District that will give the Township the authority to implement the IDEP on School District property.**

**Description:** The Township will develop and enter into an agreement that will allow it to conduct the IDEP on all Hartland Consolidated School District property within the boundaries of the Township. The agreement will include the authority to investigate and eliminate illicit connections and discharges.

**Responsibility:** Department of Township Services  
**Measure:** Signed agreement  
**Schedule:** Adoption complete in 1<sup>st</sup> year

**Task 1.10:** **Investigate the feasibility of coordinating the drainage system outfall inspection efforts of the Township with other agencies and the local communities in the County.**

**Description:** The Township will attempt to coordinate drain and outfall inspections with other local communities, LCRC, LCDC and other appropriate agencies in an effort to eliminate duplication, reduce costs and provide consistency.

**Responsibility:** Department of Township Services  
**Measure:** Meeting minutes, conclusions and recommendations  
**Schedule:** Complete in 1<sup>st</sup> year

**Task 1.11:** **Review any existing water quality data for drains and water bodies in the Township.**

**Description:** The Township will obtain and review any available water quality data for the water bodies in the Township. Possible sources are LCDC records, Michigan Department of Environmental Quality (MDEQ), the Huron River Watershed Council (HRWC), local universities and local communities. The review will be used to assist the Township in prioritizing actions and tracking progress for the IDEP.

**Responsibility:** Department of Township Services  
**Measure:** Documentation of review and recommendations  
**Schedule:** Complete in 1<sup>st</sup> year

**Task 1.12:** **Investigate the feasibility/benefit of conducting base-line and then follow-up water quality monitoring in select drains and water bodies in the Township.**

**Description:** The Township will investigate the feasibility and benefit of conducting base-line and periodic follow-up water quality monitoring in select drains and water bodies in the Township. The monitoring may provide a measure of the effectiveness of the IDEP. The Township will look at costs versus value of information obtained and decide if monitoring will be added as an additional IDEP task.

**Responsibility:** Department of Township Services

**Measure:** Documentation of evaluation, conclusions and recommendations.

**Schedule:** Complete evaluation in 2<sup>nd</sup> year and, if found to be of value, will add monitoring to implementation schedule.

**Task 1.13: Develop and adopt construction specifications that require contractors working in the Township to report any illicit connections and discharges they may observe.**

**Description:** The Township will adopt construction specifications to require contractors that are working on sewers, drains, etc. within the Township to report all illicit connections and discharges they observe to the Township.

**Responsibility:** Department of Township Services

**Measure:** Documentation of adoption, records of reports.

**Schedule:** Complete adoption in 2<sup>nd</sup> year.

2. *Develop and implement a program to minimize seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the applicant's separate storm water drainage system.*

**Task 2.01: Provide training to appropriate Township staff on illicit connections and discharges, including failed OSDS, safety issues and natural occurring phenomenon. Determine the feasibility of coordinating this training with the other agencies and the local communities in the County. (See Task 1.04)**

**Description:** The Township will attempt to coordinate IDEP training with the other local communities and the LCDC, LCRC, LCDPH, etc. As an individual or coordinated effort the Township will provide training on illicit connections and discharges, including failed OSDS to appropriate Township and other County agency staff.

**Responsibility:** Department of Township Services

**Measure:** Meeting minutes, conclusions and recommendations. Training records.

**Schedule:** Complete in 2<sup>nd</sup> year

**Task 2.02:**           **The Township will take action to identify and report failed OSDS within the township.**

**Description:**       The Township will take the following actions to locate failing OSDS and report those failures to the LCDPH.

- Citizen complaints will be the main resource for locating failing OSDS.
- Records will be reviewed to determine individuals that are not being billed for sewer services.
- OSDS failures may be identified as part of the outfall/sewer observations and sampling.
- Visual inspections of the shore/banks of lakes, streams and open drains near waterfront homes and businesses.

**Responsibility:**   Department of Township Services

**Measure:**           Complaint and referral records.

**Schedule:**          On going

**Task 2.03:**           **Evaluate the integrity of the Township’s sanitary systems.**

**Description:**       The Township will coordinate the evaluation of the sanitary systems, sewers and OSDS, at Township-owned and -operated facilities to insure that seepage into the groundwater and surface water is minimized. The evaluation may include visual inspection, flow record review, sewer televising and other means as appropriate.

**Responsibility:**   Department of Township Services

**Measure:**           Report of findings, corrections and/or recommendations

**Schedule:**          Begin evaluation in 4<sup>th</sup> year and complete report in the 5<sup>th</sup> year with periodic review.

**Task 2.04:**           **Develop an OSDS complaint tracking system. (See Task 1.07)**

**Description:**       The Township will work with the other communities and agencies in the County to develop a County-wide OSDS complaint tracking system. The group will investigate the use of the existing complaint tracking system used by the LCDPH. The LCDPH system is well-publicized, well-used and includes:

- Telephone complaint system with emergency number for non-business hours.
- Complaint documentation and tracking system.
- Follow-up notification to reporting citizen to inform them what corrective actions have been or are being taken.

Currently when the Township receives complaints regarding illicit discharges they are passed on to the Department of Health. They will continue that practice and track any referrals until a County-wide system is in place. The Township will publicize the complaint system and encourage its use.

**Responsibility:**   Department of Township Services

**Measure:**           Documentation of efforts to encourage use and records of use of the system.

**Schedule:**          The LCDPH system exists. Investigate building on to system in 1<sup>st</sup> year.

**Task 2.05:**           **Work with other communities and agencies on an OSDS inspection program.**

**Description:**       The Township will work with the local communities, LCDC, LCRC and the LCDPH on developing a program whereby OSDS would be periodically inspected for failure. They will participate in any evaluation of avenues to best

- accomplish the goal. Currently, all new construction and repairs for OSDS are permitted through the LCDPH.
- Responsibility:** Department of Township Services
- Measure:** Minutes of meetings and documentation of efforts. Documentation of conclusions and recommendations.
- Schedule:** Begin cooperative investigation in 2<sup>nd</sup> year and make recommendations in 3<sup>rd</sup> year.
- Task 2.06:           The Township will adopt an ordinance to require owners of failing OSDS to connect to a sanitary sewer system if one is available.**
- Description:** The Township will adopt an ordinance to require owners of failing OSDS to connect to a sanitary sewer system if one is available.
- Responsibility:** Department of Township Services
- Measure:** Documentation of adoption.
- Schedule:** Complete adoption in 4<sup>th</sup> year
- Task 2.07:           Investigate the feasibility of performing visual observations of lake shorelines and river banks in the Township to find potential illicit OSDS discharges.**
- Description:** The Township will investigate the feasibility and benefit of conducting visual inspections of the shorelines and banks of the water bodies and courses within the Township.
- Responsibility:** Department of Township Services
- Measure:** Documentation of evaluation, conclusions and recommendations.
- Schedule:** Complete evaluation in 2nd year and if found to be of value will add observations to implementation schedule.
- Task 2.08:           The Township will develop and adopt an ordinance to require the inspection of OSDS at the time of sale and/or every 5 years within 5 years of COC issuance, if the County does not develop a County-wide requirement.**
- Description:** The Township will adopt an OSDS inspection ordinance within 5 years of COC issuance if no County-wide requirement is developed.
- Responsibility:** Department of Township Services
- Measure:** Documentation of adoption.
- Schedule:** Complete in 5<sup>th</sup> year.
- Task 2.09:           Televis storm sewers as needed to detect illicit connections.**
- Description:** On an as-needed basis, the Township will televise those separate storm sewers under its jurisdiction to determine if illicit connections that were not detected during outfall inspections/sampling exist.
- Responsibility:** Department of Township Services
- Measure:** videos of work.
- Schedule:** Complete evaluation in 5<sup>th</sup> year
- Task 2.10:           Provide information to owners of OSDS on the proper use and maintenance of their disposal system.**
- Description:** The Township will provide information to owners of OSDS on the proper use and maintenance of their disposal system. The information may be in the form of pamphlets, newsletters, cable TV spots, or some other means that the Township finds to be effective. Effort will be made to utilize existing information such as that produced by health departments, the MDEQ, watershed

councils, etc. The Township will encourage its residents to attend any local workshops that may be held on OSDS maintenance.

**Responsibility:** Department of Township Services  
**Measure:** Type and volume of information provided. Number of Township attendees at workshops.  
**Schedule:** Complete information beginning in the 2<sup>nd</sup> year

3. *Develop a method for determining the effectiveness of the illicit discharge elimination activities which shall, at a minimum, result in the inspection of each storm water point source every five years unless an alternative schedule is approved by the MDEQ.*

**Task 3.01:** **Visual dry-weather inspection of the storm water outfalls at Hartland Consolidated School District facilities and follow-up investigation and correction of any problems. (See Task 1.02)**

**Description:** The Township will inspect the outfalls from the storm water conveyances at the covered school facilities to identify any illicit discharges or connections. Any problems that are found will be corrected within 90 days of discovery or by other appropriate schedule.

Dry weather inspections are defined as those conducted when no rain/precipitation event has occurred for a minimum of 48 hours. If flow is observed in the sewer at that time, it will be determined if the flow is natural base flow or possibly due to illicit discharges. In instances where the outfall is submerged, the outfall is directed to another enclosed sewer, or is otherwise inaccessible, the Township will visually inspect the nearest accessible upstream location.

All storm outfalls that are discharging during dry weather will be investigated further. The Township may be able to locate the source of an illicit connection/discharge solely through visual observation. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may lead to the source of a problem without additional sampling. As needed, sampling, dye and/or smoke testing, as-built plan review, or other investigative techniques will be used to determine the nature and source of the flow.

The inspections will be repeated every five years or by some other appropriate schedule that is approved by MDEQ.

**Responsibility:** Department of Township Services  
**Measure:** Records of inspections and corrections  
**Schedule:** Complete inspections and corrections in 2<sup>nd</sup> year

**Task 4.01:** **Inventory and identify ownership of the significant storm water conveyances within the Township and address ownership of any “orphan” drains.**

**Description:** Determine ownership of the significant storm water conveyances within the Township, and initiate a process to either obtain ownership or petition the LCDC to accept responsibility of any “orphan” drains - those with no known ownership.

**Responsibility:** Department of Township Services  
**Measure:** Documentation of evaluation and decision.  
**Schedule:** Complete in 3<sup>rd</sup> year

**Task 4.02:**            **Develop and implement a procedure to identify and record, map, and inspect outfalls from new construction.**

**Description**            The Township will develop and implement a procedure to add any new outfalls that result from new construction. The procedure will involve identifying new outfalls and receiving waters through construction approval process, adding the outfalls to the existing drainage system map, and performing an initial dry weather inspection of the outfall.

**Responsibility:**        Department of Township Services

**Measure:**                Procedure documented and implemented. New outfalls mapped and inspected.

**Schedule:**                Complete in 3rd year

**Task 4.03:**            **Investigate the use of hand-held GPS monitors.**

**Description**            The Township will investigate the use of hand-held GPS monitors during observation/sampling to more accurately map the location of the conveyances, outfalls, OSDS and problem areas.

**Responsibility:**        Department of Township Services

**Measure:**                Documentation of evaluation and decision.

**Schedule:**                Complete in 1<sup>st</sup> year

## ***Section IV - Summary of Planned Efforts***

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The Township's IDEP is summarized in the tables that follow. The first table lists the IDEP tasks by the associated General Permit (MIG619000) requirement (Part I, Section A.3.a) and it provides the implementation schedule and measure for each task.

Summary of IDEP tasks, implementation schedules and measures:

PERMIT REQUIREMENT	TASK #	TASK DESCRIPTION	SCHEDULE (Yr. After COC Issued)	MEASURE
<i>1. Develop and implement a program to find and eliminate illicit discharges and illicit connections found during dry weather screening.</i>	1.05	Review existing legal authority	Complete in 1 <sup>st</sup>	Written recommendations
	1.06	Develop needed legal authority	Begin and complete in 2 <sup>nd</sup>	Copies of modified authority
	1.07	Develop complaint system	Complete in 1 <sup>st</sup>	Documented use of system
	1.11	Review existing water quality data	Complete in 1 <sup>st</sup>	Written report and recommendations
	1.10	Develop drain inspection schedule	Complete in 1 <sup>st</sup>	Written schedule
	1.01	Inspect outfalls at School owned facilities	Begin and complete in 2 <sup>nd</sup>	Records of inspection and correction
	1.10	Investigate the coordination of inspections	Complete in 1 <sup>st</sup>	Meeting minutes, written recommendation
	1.04	Provide IDEP training to staff	Begin and complete in 2 <sup>nd</sup>	Training records
	1.01	Inspect School outfalls	Begin in 2 <sup>nd</sup> ; complete in 5 <sup>th</sup>	Records of findings
	1.08	Trace illicit discharges	Begin in 2 <sup>nd</sup> ; ongoing	Records of findings and eliminations
	1.02	Enforcement for non-correction	Begin in 2 <sup>nd</sup> ; ongoing	Records of actions; number of illicit found vs. number eliminated
	1.11	Investigate ambient water quality monitoring	Begin and complete in 2 <sup>nd</sup>	Written recommendations
	1.03	Coordination with MDEQ	Begin in 1 <sup>st</sup> ; ongoing	Copies of referrals and reports

Summary of IDEP tasks, implementation schedules and measures (cont.):

PERMIT REQUIREMENT	TASK #	TASK DESCRIPTION	SCHEDULE (Yr. After COC Issued)	MEASURE
2. <i>Develop and implement a program to minimize seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the applicant's separate storm water drainage system.</i>	2.04	Encourage use of LCDPH OSDS complaint system	Begin in 1 <sup>st</sup> ; ongoing	Documentation of efforts to encourage and of use
	2.05	Participate in effort to develop OSDS inspection program	Begin in 2 <sup>nd</sup> , complete in 3 <sup>rd</sup>	Written recommendations on program
	2.03	Evaluate sanitary systems at Township facilities	Begin in 4 <sup>th</sup> ; complete in 5 <sup>th</sup>	Report of findings, corrections and/or recommendations
3. <i>Develop a method for determining the effectiveness of the illicit discharge elimination activities which shall, at a minimum, result in the inspection of each storm water point source every five years unless an alternative schedule is approved by the MDEQ.</i>	3.01	Inspect outfalls at School facilities offices	Begin and complete in 2 <sup>nd</sup>	Records of inspection and correction
4. <i>Prepare an updated map of the location of each known storm water point source and the respective receiving water or drainage system.</i>	4.03	Evaluate the use of GPS in the inspections of outfalls and tracking illicit discharges	Complete in 1 <sup>st</sup> year	Documentation of decision
	4.03	Update drainage map based on field observations	Begin in 2 <sup>nd</sup> , complete in 5 <sup>th</sup>	Copy of updated map and table of outfalls
	4.02	Implement process to record new outfalls	Develop and implement in 3 <sup>rd</sup>	Documentation of implementation; map and table updated with new outfalls

IDEP tasks in chronologic order by year (after COC issuance) in which the task will be initiated:

YEAR	TASK #	TASK DESCRIPTION	SCHEDULE
<i>1<sup>st</sup> year</i>	1.05	Review existing legal authority	Complete in 1 <sup>st</sup> year
	1.07	Develop storm water complaint reporting and response system (see Task 2.1)	Complete in 1 <sup>st</sup> year
	1.11	Review existing water quality data	Complete in 1 <sup>st</sup> year
	1.10	Develop drain/outfall inspection schedule	Complete in 1 <sup>st</sup> year
	1.10	Investigate coordination of IDEP inspections throughout the County	Complete in 1 <sup>st</sup> year
	1.03	Coordinate program with MDEQ and report on illicit	Begin in 1 <sup>st</sup> ; ongoing
	2.04	Encourage use of LCDPH OSDS complaint system (similar to Task 1.3)	Begin in 1 <sup>st</sup> ; ongoing
	4.03	Evaluate the use of GPS during inspections and tracking	Complete in 1 <sup>st</sup> year
<i>2<sup>nd</sup> year</i>	1.06	Develop adequate legal authority if needed	Complete in 2 <sup>nd</sup> year
	1.01	Inspect outfalls at School facilities	Complete in 2 <sup>nd</sup> year
	1.04	Provide IDEP training to Township staff	Complete in 2 <sup>nd</sup> year
	1.01	Inspect School outfalls	Begin in 2 <sup>nd</sup> ; complete in 5 <sup>th</sup>
	1.08	Trace illicit discharges	Begin in 2 <sup>nd</sup> ; ongoing
	1.02	Enforcement for non-correction	Begin in 2 <sup>nd</sup> ; ongoing
	1.11	Investigate the feasibility and benefit of conducting base-line and follow-up ambient water quality monitoring	Complete in 2 <sup>nd</sup> year
	2.05	Participate in effort to develop OSDS inspection program in County	Begin in 2 <sup>nd</sup> ; complete in 3 <sup>rd</sup>
	4.03	Update drainage map based on field observations	Begin in 2 <sup>nd</sup> ; complete in 5 <sup>th</sup>
<i>3<sup>rd</sup> year</i>	4.02	Develop and implement a process to record new outfalls	Complete in 3 <sup>rd</sup>
<i>4<sup>th</sup> year</i>	2.03	Evaluate sanitary systems at Township facilities	Begin in 4 <sup>th</sup> ; complete in 5 <sup>th</sup>

*Exhibit A*  
*Aerial Photograph*

***Exhibit B***  
***Zoning Map***