

**CITY OF EAST LANSING
STORM WATER MANGEMENT PROGRAM**

**IMPLEMENTATION PLAN
FOR COMPLYING WITH THE
NPDES PERMIT REQUIREMENTS**

**7. ILLICIT DISCHARGE
ELIMINATION PLAN (IDEP)**

UPDATED JANUARY 2020

INTRODUCTION

Overview:

This section of the “Implementation Plan” is intended to serve as the primary guidance document for the Illicit Discharge Elimination portion of the Storm Water Management Program. This section was originally developed to provide a general overview of the requirements outlined in the City of East Lansing’s NPDES Permit No.MI0059327 which became effective June 2015. The Implementation Plan was subsequently reviewed and updated to reflect any changes to the new NPDES Permit which becomes effective February 1, 2020.

In particular, this section addresses Part I, Section A. 3. d “Illicit Discharge Elimination Plan (IDEP)” which states *“The permittee shall implement and enforce the IDEP to detect and eliminate illicit discharges and connections to the permittee’s MS4. The permittee shall implement the IDEP as part of the SWMP to the maximum extent practicable.”*

2015 Original Implementation Plan:

The program incorporated the materials provided in the 2013 application for the NPDES Permit which constitutes the City’s official Storm Water Management Plan.

The IDEP plan was required to apply only to those areas of the City where the sewage system is identified as a separate storm water collection system owned and operated by the City (i.e. part of a MS4). Those areas of the City served by combined sewer systems will therefore continue to be regulated by the provisions of the City’s NPDES Wastewater Treatment Plant Discharge Permit No. MI 10022853. However, the City elected to inventory and include all discharges to the waters of the state located within the City’s jurisdiction- City owned and operated discharges; private discharges from commercial, apartment and other developments; and discharges from areas served by combined sewers.

The City of East Lansing’s original IDEP Program, dated April 2008, was submitted and subsequently approved by MDEQ. The original plan established an ongoing program for reviewing the known discharges on a five-year reinspection cycle; updating the IDEP documents to meet Federal and State requirements as they become effective; and modifying the IDEP documents as changes in the City’s separate storm sewer system occur or are discovered.

The City completed the first full five-year cycle (2008 thru 2012 inclusive) for reinspecting all known discharge points. The City was therefore able to update their original IDEP Report in November 2013 and include it in their 2013 application. The update included revisions to the original listing of discharge points and updates necessary to address any new State and Federal requirements.

2017 Updated Implementation Plan:

As noted in Section 3 Outfalls or Point of Discharge Identified, Constructed or Installed After Permit Issuance, no new MS4 discharges have been added to the IDEP listing since the 2013 application and subsequent issuance of the 2015 NPDES Permit. However, several private storm sewer leads have been discovered and added to the overall listing of discharges and outfalls.

MDEQ Audit:

An audit of the City's Illicit Discharge Elimination Plan was conducted by EGLE on May 24, 2017. No issues were noted with the City's IDEP plan or program.

2020 Updated Implementation Plan:

As noted in Section 3 Outfalls or Point of Discharge Identified, Constructed or Installed After Permit Issuance, one new MS4 discharges was added in 2019 to the IDEP listing since the 2017 application. However, several private storm sewer leads continue to be discovered and added to the overall listing of discharges and outfalls.

Mapping:

The City maintains updated atlases of its sewer systems (storm, sanitary and combined sewers) as part of its GIS program.

As noted above, the City has elected to include all discharges, City owned and operated as well as private discharges, in its IDEP. Thus, two specific maps are maintained as part of the SWMP:

- A map identifying the City owned and operated discharges to the waters of the state. This map represents the "Authorized Outlets and Points of Discharge" permitted in accordance with Part I, Section A 1. of the NPDES Permit.
- A map identifying the discharges to the waters of the state- City owned and operated as well as private discharges located in both the separate and combined sewer service areas. All discharges are included in and inspected as part of the IDEP.

Both maps are updated as outfalls and points of discharge are identified, constructed and installed.

IDEP Plan:

The IDEP plan, which was last updated November 2013 and submitted with the 2017 NPDES Application, meets all requirements as specified under Part 1, Section A, 3.d.2) of the NPDES Permit. This includes policies and procedures for conducting field observations, field screening, and source investigations. The IDEP plan also includes policies and procedures for responding

to illicit discharges and pursuing enforcement action. No additional updates have been made at this time.

Training:

The training of City employees is outlined in the IDEP plan. In general, training of engineering staff that are responsible for developing and implementing the program are trained as part of the GLRC IDEP Committee training activities. DPW staffs from various Divisions are trained in recognizing potential illicit discharges that they may observe as part of their normal daily duties.

A record of training activities is maintained on the designated IDEP Employee Training Form.

Evaluation:

As noted, in the IDEP plan the effectiveness of the plan is measured by the number of illicit discharges that are identified and subsequently removed as part of the ongoing IDEP plan.

To-date, only three illicit discharges have been discovered as a result of the IDEP investigations: one in 2008 and two in 2012. All three illicit discharges were immediately investigated, identified and removed.

Implementation & Tracking:

The following documents have been developed to help measure and ensure compliance with the IDEP requirements of the NPDES Permit:

- A checklist encompassing the various aspects and requirements of the IDEP has been developed for use on an annual basis.
- The IDEP Violation Form for tracking noncompliance to ensure a prompt resolution for eliminating an illicit discharge.
- The IDEP Employee Training Form to track GLRC sponsored training, in-house training-etc....