



**Oakland County, Michigan
2004 ILLICIT DISCHARGE
ELIMINATION PLAN**

**Certificate of Coverage MIG610042
General Storm Water Discharge Permit
MIG619000**

Submitted to:

**State of Michigan Department of Environmental Quality
Surface Water Quality Division**

Prepared by:

**Oakland County Drain Commissioner's Office
Environmental Unit**

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Introduction

This document replaces the Illicit Discharge Elimination Plan (IDEP) for Oakland County which was originally developed and submitted in compliance with the Michigan Department of Environmental Quality (MDEQ) Voluntary General Storm Water Permit for the Rouge River Watershed issued to Oakland County in 1998.

The purpose of this document is to:

- 1) *Meet the requirements of the mandatory Phase II National Pollutant Discharge Elimination System (NPDES) General Storm Water Permit No. MIG619000 and Certificate of Coverage No. MIG610042 issued to Oakland County on December 17, 2003.*
- 2) *Identify the various tasks, roles, and responsibilities for Oakland County departments and divisions necessary to continue the existing IDEP program in the Rouge River Watershed and expand the program to cover the Clinton River, Huron River, Flint River, and Shiawassee River Watersheds as indicated in the above mentioned Certificate of Coverage.*

This IDEP is a general guidance document for the establishment of an ongoing Illicit Discharge Elimination Program for Oakland County. Implementation of the IDEP is the responsibility of the Oakland County departments and divisions as defined herein Plan and as outlined under the Certificate of Coverage No. MIG610042. Tasks to be implemented as part of an ongoing Illicit Discharge Elimination Program will be further defined by each department and division under the Oakland County Storm Water Pollution Prevention Initiative (SWPPI). The IDEP and SWPPI will be implemented and the plans adjusted as staffing and funding sources allow.

Phase II Requirements:

As required under the Federal Phase II General Storm Water Permit No. MIG619000, this IDEP outlines programs necessary to meet the following minimum permit requirements:

- 1) *A program to find, prioritize, and eliminate illicit discharges and illicit connections identified during dry weather screening activities (Part 1.A.3.a.1)*
- 2) *A description of a program to minimize infiltration of seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the applicant's separate storm water drainage system (Part 1.A.3.a.2)*
- 3) *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 Michigan Department of Environmental Quality approves an alternate schedule. An alternate schedule may focus efforts on urbanized areas and cover other regulated areas less frequently based on watershed goals (Part 1.A.3.a.3)*
- 4) *An updated map of the location of each known storm water point source and the respective receiving water or drainage system. (Part 1.A.3.a.4)*

Key Definitions:

In order to ensure the plan is developed and implemented with a clear understanding of the types of sources to be eliminated, the following key definitions are understood:

- 1) *Municipal Separate Storm Sewer System (MS4): Includes any storm water collection system owned or operated by the permittee that discharges either to a "Surface Water of the State" or to a storm water collection system owned or operated by another public body.*
- 2) *Illicit Discharge: Any discharge (or seepage) to the separate storm water system that is not composed entirely of storm water or uncontaminated groundwater.*
- 3) *Illicit Connection: A physical connection to the separate storm water drainage system that, 1) primarily conveys illicit discharges into the system and / or 2) is not authorized by the local authority (where a local authority requires such authorization or permit).*

- 4) *Point Source Outfall: An outfall from a drainage system to the “Waters of the State” or a point where a storm water drainage system discharges into a system owned or operated by another public body.*
- 5) *Significant Illicit Discharge: A discharge that shows evidence of impairing water quality of the receiving water.*
- 6) *“Waters of the State” means ground waters, lakes, rivers, and streams and all other watercourses and waters, including the Great Lakes, within the jurisdiction of this state.*
- 7) *“Surface Waters of State” means all of the following, but does not include drainage ways and ponds used solely for wastewater conveyance, treatment, or control:*
 - (i) *The Great Lakes and their connecting waters.*
 - (ii) *All inland lakes.*
 - (iii) *Rivers.*
 - (iv) *Streams*
 - (v) *Impoundments.*
 - (vi) *Open drains.*
 - (vii) *Other surface bodies of water within the confines of the state.”*

The Oakland County Stormwater Committee (OCSC)

The Oakland County Stormwater Committee (OCSC) is comprised of representatives from appropriate Oakland County agencies and departments. The purpose of the OCSC is to define the existing and needed programs necessary to bring Oakland County into compliance with the Phase II storm water regulations.

The departments and agencies currently comprising the OCSC include: Oakland County Drain Commissioner’s Office, Road Commission for Oakland County, Oakland County Parks & Recreation, Offices of the Oakland County Executive, Department of Facilities Management, Waste Resource Management, Planning and Economic

Development Divisions of the Community and Economic Development Department, Department of Aviation and Transportation, and the Oakland County Health Division.

The OCSC serves as the steering committee to provide input and oversight into the development and implementation of the Illicit Discharge Elimination Plan, Public Education Plan, Storm Water Pollution Prevention Initiative, and other documents and reports as required by the Phase II Permit.

The Oakland County Drain Commissioner's Office serves in the capacity of coordinating the OCSC and as the reporting agency for the Phase II Permit.

Overview

With the issuance of the mandatory Federal Storm Water Phase II Permit in 2003, Oakland County realizes its responsibility in developing effective storm water management programs. Under this permit, the coverage for Oakland County will expand to five major watersheds; this includes the Rouge River, Clinton River, Huron River, Shiawassee River, and Flint River. This expanded permit area includes eleven separate sub-watersheds.

Oakland County also realizes the major task in expanding the existing Illicit Discharge Elimination Program to cover this increased area and to meet the additional requirements of the Phase II Permit. Development and implementation of the IDEP in cooperation with the other Phase II permitted communities and agencies will be crucial to ensuring cost effective and efficient storm water management programs throughout the county.

The IDEP implementation program will cover thousands of miles of county road drain and storm drain systems. This includes 2,600 miles of county roads, 80 bridges and 300 miles of state highway maintained by the Road Commission for Oakland County and 3,400 miles of storm drain systems maintained by the Oakland County Drain Commissioner's Office.

The IDEP also defines programs necessary to assess and minimize impact from county operations and activities at all county owned or operated properties and facilities. This includes:

- 1) Nine major county park systems including: golf courses, water parks and environmental interpretive centers operated by the by Oakland County Parks and Recreation.
- 2) Airports and administrative offices operated by Oakland County International Airport.
- 3) Maintenance facilities and administrative offices operated by the Road Commission for Oakland County.
- 4) Administrative offices, operations and maintenance buildings, waste water treatment plants, storm water retention / treatment basins, pump maintenance facilities, sludge acceptance facilities and pumping stations operated by the Oakland County Drain Commissioner's Office.
- 5) All of the county facilities located on the Oakland County "Campus" complex in Pontiac, Waterford and additional satellite offices that are under the direction of the Office of the County Executive, and operated by the Department of Facilities Management.

Plan Outline

The Oakland County IDEP defines the goals and tasks that will need to be developed by Oakland County departments and divisions in order to make the transition from the Voluntary General Storm Water Permit to the mandatory Phase II Storm Water Permit.

Each department or division will be responsible for developing appropriate activities necessary to implement the IDEP. These activities are listed as tasks in the Storm Water Pollution Prevention Initiative (SWPPI) for Oakland County. Each department or division will be responsible for implementing tasks defined in the SWPPI including providing necessary staffing levels, equipment and funding.

The SWPPI for Oakland County was updated in 2004 to comply with the Phase II Permit requirements. SWIPPI activities are defined for Oakland County departments and divisions with responsibilities under the IDEP. Departments and divisions currently included are: Oakland County Drain Commissioner's Office (OCDC), Road Commission for Oakland County (RCOC), Oakland County Facilities Management (OCFM), Oakland County International Airport (OCIA), Oakland County Parks and Recreation (OCPR) and the Oakland County Health Division (OCHD).

IDEP Objectives

Objectives of this IDEP are defined below. A summary of IDEP objectives with correlation to the Phase II requirements and the SWPPI is included in Table 1.

Objective 1- Identify all county owned or operated road drain and storm drain systems, properties, and facilities serviced by separate storm water collection systems.

A. Identify county road drains and county storm drains located in the Phase II Permit area of coverage.

OCDC and RCOC will review maps and plans, and / or make field surveys necessary for determining storm drain systems located in the Phase II Permit area of coverage. Each department shall provide the OCSC a map and a list of drainage systems that are located in the Phase II Permit area of coverage.

B. Identify properties, facilities and MS4s owned or operated by Oakland County that are located in the Phase II Permit area of coverage and have separate storm water collection systems.

OCDC, RCOC, OCPR, OCIA, and OCFM will identify properties and facilities under their jurisdictions, which are: 1) located in the Phase II Permit area of coverage and 2) have separate storm water collection systems. Each department and division will provide the OCSC with updated maps and lists of facilities located in the Phase II Permit area of coverage.

C. Create an MS4 Database

OCDC will work with RCOC, OCFM, OCIA, and OCPR to create a GIS based database for tracking IDEP activities on Oakland County owned and operated storm water collection systems. OCDC will make the database available to departments and divisions for population and will report annually on progress.

Objective 2- Identify all known outfalls from county owned or operated MS4, properties, and facilities which discharge to the “Waters of the State” or another public storm water collection system.

A. Identify known point source outfalls from county storm drain systems, road drain systems, properties, and facilities.

OCDC, RCOC, OCPR, OCIA, and OCFM will review existing maps of drain systems, GIS data, and property and facility plans as necessary to identify and locate existing known point source outfalls for their collection systems. Each department or division will provide the OCSC with a table of outfalls, a map of outfall locations, and GIS data if available.

B. Map outfall locations in the field using GPS equipment.

OCDC, RCOC, OCPR, OCIA, and OCFM shall make arrangements to have the locations of all known outfalls identified and recorded using GPS equipment. Each department will develop and submit to the OCSC an anticipated schedule of outfall mapping activities and provide annual reports on outfall mapping progress.

C. Prepare GIS based maps of outfall locations for Phase II reporting.

OCDC will develop a plan for integrating GIS systems and outfall data for the purpose of annually reporting to the MDEQ. This plan will include development of standardized fields necessary to capture required information and development of databases and systems necessary to prepare maps of all known outfall locations for the purpose of Phase II reporting.

Objective 3-Develop a procedure and schedule for screening known outfalls for illicit discharges during dry weather.

A. Establish dry weather discharge screening procedures and parameters

OCDC will create standardized procedures to be used in conducting dry weather screening activities at identified outfalls. This will include, at a minimum, an examination of each outfall during dry weather for the presence of flow and indication of primary pollutants using physical, water quality, chemical, and biological indicators of sewage contamination. OCDC will make the procedures available to the departments and divisions.

OCDC has developed illicit discharge dry weather screening criteria under the voluntary stormwater permit which has been used to survey County drains in the Rouge and Clinton River Watershed. Parameters include visual observations for flow, color, odor, clarity and floatables (oils sheens, paper, soap suds, etc.). It also includes examination of the outfall condition and surrounding areas and sediments for the presence of staining or deposits and an evaluation of vegetative growth.

Flow from outfalls suspected of containing pollutants (based on a visual observation) are tested for ammonia and surfactants (detergents) using in filed test kits. Outfalls exceeding 1.0 part per million (ppm) of ammonia and or .75 ppm of detergents are sampled for *Esherichia coli*. (*E.coli*) . Samples are analyzed by the Walled Lake / Novi Waste Water Treatment Facility. Outfalls exceeding 1,000 colony forming units (CFU) /100 ml of sample are considered as having a potential for containing illicit discharges from sewerage sources. Outfalls with *E.coli* counts exceeding 10,000 CFU / 100 ml are given a high priority for investigation.

B. Staff, training, and equipment

OCDC, RCOC, OCPD, OCIA, and OCFM will provide for necessary staff, training, equipment, and resources to perform the dry weather screenings at known outfall locations.

C. Development of prioritization criteria for known outfall dry weather screening activities.

OCDC will work with the OCSC members and others to establish prioritization criteria to be used in determining the schedule for dry weather screening activities. Items to be considered should include: outfall location, land use, proximity to lakes or streams, environmentally critical or sensitive areas, Onsite Sewage Disposal Systems (OSDS), known sources of contamination, historical problems with the property or drain system, citizen complaints, and issues of concerns identified by the communities and Sub-Watershed Advisory Groups (SWAGs). OCDC will make prioritization criteria available to departments and divisions.

D. Prioritization and scheduling of dry weather screening activities at known outfall locations.

OCDC, RCOC, OCPR, OCIA, and OCFM will develop a schedule of dry weather screening activities to be submitted to the OCSC. It is recommended that the initial dry weather screening be performed in conjunction with the GPS outfall identification for purposes of ease and efficiency. It is also recommended that each known outfall be visited and dry weather screened at least once during the permit period.

Departments and divisions should develop a prioritization schedule of when and how often these known outfalls are looked at based on their potential to contain illicit discharges. Each department and division will submit to the OCSC a schedule for dry weather screening of outfalls and report on dry weather screening activities annually.

Objective 4-Develop a procedure and a schedule for surveying county properties and facilities for unknown sources of illicit discharges and identifying potential sources of contamination.

A. Development of property and facility survey procedures.

OCDC will develop procedures for surveying properties and facilities for evidence of illicit discharges and in assessing their potential for storm water contamination.

OCDC will define information needed to be collected in the MS4 database.

B. Prioritization of property and facility surveys

OCDC, RCOC, OCPD, OCIA, and OCFM will develop a prioritization and schedule to perform facility surveys. It is recommended that each facility and property be surveyed within the permit period. Priorities for when surveys should occur should be based on the results of the dry weather screening activities and any identified illicit discharges to the storm water collection system. Property and facility surveys should be prioritized by site ranking criteria developed similar to objective 3C listed above. Departments and divisions will submit a schedule for property surveys to the OCSC and report on their progress annually.

C. Property and facility surveys

OCDC, RCOC, OCPD, OCIA, and OCFM will be responsible for surveying their properties and inspecting their facilities for evidence of storm water contamination, identifying potential storm water pollution problems and developing storm water pollution prevention activities. Departments may perform this work themselves, contract with other OCSC members or other third parties to have the work done.

Exceptions: The Oakland County International Airport, Southwest Airport, Troy Airport, Commerce Township Wastewater Treatment Facility and Walled Lake Waste Water Treatment Facility have individual General Storm Water Permits requiring separate Storm Water Pollution Prevention Plans. Each department or division is responsible for complying with the conditions of their permits.

D. Training

OCDC, RCOC, OCPD, OCIA, and OCFM will provide training to facility management and staff on the identification of illicit discharges. This training will focus mainly on identification of pollutants located on the property with a high priority on sanitary sewerage sources. Training will also include notification and reporting requirements. OCDC will provide assistance for developing illicit discharge training programs. Department and divisions will report on training activities annually.

E. Reporting

OCDC, RCOC, OCPR, OCIA, and OCFM will provide information on properties and facilities to the OCSC to be included in the MS4 database. Departments and divisions will also report annually to the OCSC on facility and property inspections, number of illicit discharges detected, number of illicit connections found, and number of illicit connections eliminated.

Objective 5- Develop a procedure and schedule for surveying county road drainage and storm water drainage systems for illicit discharges from unknown point sources.

A. Review procedures for road drainage and storm drain system surveys

OCDC and RCOC will review current IDEP procedures to make sure they are adequate to comply with Phase II requirements. This may include adding additional indicators for pollutants necessary to comply with state water quality standards. A greater focus will also be placed on identification of jurisdictional responsibilities and informational data sharing both internally between departments and externally with the communities and other Phase II permit holders.

B. Prioritization and scheduling of road drainage and storm drain systems surveys.

OCDC and RCOC will develop prioritization procedures and schedules for surveying open and enclosed drainage systems for illicit discharge sources. Prioritization should include; dry weather discharge screening results, complaints and referrals, proximity to OSDS, proximity to recreational or surface waters, known water quality data, sites of contamination, surrounding land use, historical water quality problems and availability of funding. OCDC and RCOC will provide a list of drainage systems and schedules for surveying to the OCSC and report on drain survey activities annually as required under the permit. The OCSC will continue to investigate grant funding sources to complete this survey work.

C. Staff, training and equipment

OCDC and RCOC will continue to provide necessary staff, training, and equipment to meet drain surveying needs. OCDC and RCOC will also define additional field staff to be trained to identify illicit discharges to county drain systems during everyday work activities, this may include: engineers, inspectors, drain maintenance staff, operators, lawn mowing crews, and others.

Objective 6-Investigation of illicit discharges and elimination of illicit connections identified during dry weather screening activities, drain surveys, and complaint investigations.

A. Investigation of illicit discharge sources

OCDC and RCOC will continue to provide staff, equipment, and resources necessary to investigate illicit discharges discovered through outfall screenings activities, drain surveys and complaint investigations. OCDC and RCOC will continue to report annually on illicit discharge investigation activities.

Currently ODDC, RCOC, and OCHD respond to complaints from citizens, communities, and other departments and agencies. OCDC investigates complaints of discharges to County Drains, RCOC investigates discharges to County road drains and OCHD investigates complaints of failing septic systems and sanitary sewerage discharges.

OCDC operates an IDEP program and has been dry weather screening and investigating Illicit discharges to County drains. Below is a brief description of the prioritization method used in investigation of outfalls suspected of containing illicit discharges

Complaints, Referrals, and Spills

The first priority in IDEP investigation by OCDC is response to citizen complaints, referrals from local governments, other County departments and state agencies regarding pollutant discharges, illegal dumping and spills to Oakland County drains.

OCDC has formed a Storm Water Action Team (SWAT) and offers a 24 hour environmental hotline to communities for citizens to report environmental pollution to lakes, creeks, and streams. OCDC Environmental Unit Inspectors are the primary investigators for SWAT and investigate all complaints and referrals through established OCDC complaint response procedures.

Sewerage discharges

Drains suspected of receiving sanitary sewerage are given highest priority for investigation. Drains exhibiting physical evidence of sewage contamination (floatables, toilet paper, heavy sewerage odors, etc.) are regarded as a primary concern with confirmation of sewerage contamination using ammonia as a chemical indicator and *Escherichia coli* (*E.coli*) as an indicator organism. Baring physical evidence of sewerage contamination, drains exhibiting ammonia concentrations greater than 1 part per million (ppm) and / or *E. coli* counts greater than 10,000 Colony Forming Units (CFU) per 100 ml of sample are also considered a high priority for investigation. Drains discharging to recreational water bodies with an *E.coli* count exceeding 300 CFU / 100 ml are considered of primary concern with regards to sewerage contamination and Public Health concern. These drains are given a high priority for surveillance and investigation, especially during the summer months from Memorial Day weekend through Labor Day weekend. Drains exhibiting *E.coli* counts exceeding 1,000 CFU /ml. but less than 10,000 CFU/ml are considered a secondary priority and scheduled for further examination and surveillance as needed. The priority for investigation of these drains is considered on a case by case basis with regards to need for immediacy in investigation. Other factors such as; location, proximity to recreational water bodies, environmentally sensitive or critical areas, residential areas, complaint information and historical water quality data are taken into consideration when assessing priority status and scheduling for surveys and investigation.

Discharges of Oils, Greases, salts and other polluting materials

Prioritization of investigation of discharges discovered during outfall examinations and drain surveys are considered on a case by case basis. Physical evidence of an illicit discharges, ie, oil sheens, soap suds, floatables , etc. are primary evidence an illicit Discharge. In-field testing and analytical sampling is used to confirm and verify the presence of an illicit discharge and quantify types and amounts of materials if possible. Discharge of pollutants classified as “Critical Materials” under Act 451 Part 31, Part 5 Rules, are considered to be of primary concern.

Discharges of smaller amounts of materials discovered during complaint investigations, dry weather screenings, and drain surveys are recorded and prioritized on a case by case basis with regards to immediacy for investigation.

B. Identification and elimination of illicit connections

OCDC, RCOC, and OCHD will continue to work with local communities, as well as local and state authorities to identify and eliminate illicit connections through enforcement of the Drain Code, Public Health Code, local ordinances, and state laws and regulations. OCDC, RCOC and OCHD will continue to report on illicit connections eliminated annually.

Spills of polluting materials to the waters of state are reported to MDEQ, the local Heath Department, local authority and local Emergency Management as appropriate. OCDC inspectors are trained in evaluating spills, and initiating an appropriate spill response, and spill notification process.

Discharges suspected of containing sanitary sewerage are reported the system owner, the property or facility owner, the MDEQ, the local community and the local Heath Department for enforcement and corrective action where necessary.

Discharges of oils, greases, fuels, salts and other Critical Materials which can be identified in quantities above the Reportable Quantity (RQ) are reported to the

system owner or operator, the property or facility owner or operator, the MDEQ, local Community, local emergency response and local health department as appropriate.

Discharges of smaller amounts of materials discovered during complaint investigations, dry weather screenings, and drain surveys are recorded, reported to the local community, local health department or other appropriate authority for follow-up and included in the Annual Report to MDEQ.

C. *Develop procedures for illicit discharges identified at county facilities*

OCDC, RCOC, OCPR, OCIA, and OCFM will identify, report, and respond to illicit discharges discovered at county facilities. Procedures to be developed include: discharge notification, investigation, spill response, corrective actions, follow up monitoring, and reporting. Departments and divisions will report on illicit discharge activities annually to the OCSC and as required under local and state programs.

D. *Training*

OCDC, RCOC, OCPR, OCIA, and OCFM will train staff, as necessary, to investigate illicit discharges from county drain systems and facilities. Departments and divisions shall train facility staff on the identification, notification and reporting requirements for illicit discharges and any necessary spill response procedures. Each department and division will report annually on training activities.

Currently OCDC and RCOC Inspectors performing surveys have attended training for IDEP Investigation offered by the Wayne County Department of Environment and MDEQ. Additionally OCDC and RCOC environmental inspectors and supervisory staff have attained Industrial Stormwater Operator Certification from MDEQ. OCDC and OCIA facilities with individual Industrial Storm water permits have Certified Industrial Storm water Operators in place as required. Additional OCDC and RCOC inspectors are trained in Soil Erosion and Sedimentation Control and are Certified Construction Site Storm Water Operators.

Each department will assess their facilities and training needs and provide this information to the OCSC. The OCSC will evaluate the overall training needs for the County, provide information on external training events and assess whether an internal training program is necessary and develop training programs and materials if needed.

Objective 7-Continue to promote and improve citizen complaint programs

A. Continue to provide 24-Hour Environmental Hotline services

OCDC will continue to provide environmental hotline services to communities. OCDC will log complaints, provide IDEP investigative services on county related complaints, and provide referral services for community related complaints. OCDC will report annually on complaint activities.

B. Update and Implement the Oakland County 24-Hour Environmental Hotline program.

OCDC will update the environmental hotline program including: coordination with communities to correct contact lists, establish costs, educate operators and update educational brochures. OCDC will implement the program and report annually on progress.

C. Publicize 24-Hour Environmental Hotline program to staff and county residents

A program to publicize and promote the environmental hotline program to staff and publish materials for distribution to residents of Oakland County will be developed under the Oakland County Public Education Plan (PEP). OCDC will report on progress annually.

Objective 8-Programs to address OSDS and sanitary sewer discharges.

A. Oakland County Health Division OSDS installation and enforcement

OCHD will continue to authorize issuance of permits for new OSDS and continue to investigate and seek correction for reported failing systems. OCHD will report annually on numbers of permits issued and number of failed systems corrected.

B. Oakland County OSDS Program

OCHD will continue to work with communities on developing OSDS inspection programs. OCHD will report annually on program progress.

C. Sanitary sewer maintenance and inspections

OCDC Operations and Maintenance (O&M) will continue to perform routine inspections on OCDC owned or operated sanitary sewer systems to insure proper operation and prevent overflows and / or release of sewerage to surface waters. OCDC O&M will continue to report statistics to the OCSC annually and continue to report on sanitary sewage releases as required.

Objective 9- Programs to prevent illicit connections

A. Verify new connections, and prevent illicit connections

OCDC drain inspection staff will continue program to inspect new construction and reconstruction projects of storm and sanitary systems managed by the OCDC for proper connection. OCDC Inspection will provide statistics annually to the OCSC.

Table 1. Illicit Discharge Elimination Plan Objectives

Objectives	Responsible Party	Phase II IDEP	SWPPI Item	Tentative Schedule												
				2005				2006				2007				
				1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	
Objective 1 <i>Identify all county owned or operated road drainage and storm water drainage systems, properties, and facilities serviced by separate storm water collection system</i>																
A. <i>Identify road drainage and storm water drainage systems located in Phase II Permit coverage areas</i>	OCDC and RCOC	1	1A, 1D													
B. <i>Identify properties and facilities owned and operated by Oakland County that are located in the Phase II Permit coverage area that have separate storm water collection systems</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A,1D													
C. <i>Create an MS4 Database</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A													
Objective 2 <i>Identify all known outfalls from county owned or operated drain systems, properties and facilities and the receiving water or storm water collection system to which they discharge</i>																
A. <i>Identify known point source outfalls from county storm drain systems, road drain systems, property and facilities</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A, 1D													
B. <i>Map outfall locations in the field using GPS equipment</i>	OCDC, RCOC, OCP, OCIA, OCFM	1,4	1A,1D													
C. <i>Prepare GIS based maps of Outfall locations for Phase II reporting</i>	OCDC	4	1A													
Objective 3 <i>Develop a procedure and schedule for screening known outfalls for illicit discharges during dry weather</i>																
A. <i>Establish dry weather discharge screening procedures and parameters</i>	OCDC	1	1D													
B. <i>Staff, training and equipment</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A, 1D													
C. <i>Development of prioritization criteria for know outfall dry weather screening activities</i>	OCDC	1,3	1D													
D. <i>Prioritization and scheduling of dry weather screening activities at known outfall locations</i>	OCDC, RCOC, OCP, OCIA, OCFM	1,3	1A, 1D													
Objective 4 <i>Develop a procedure and a schedule for surveying County properties and facilities for unknown sources of illicit discharges and identifying potential sources of contamination</i>																
A. <i>Development of property and facility survey procedures</i>	OCDC		1D													
B. <i>Prioritization of property and facility surveys</i>	OCDC, RCOC, OCP, OCIA, OCFM	1,3	1A, 1D													
C. <i>Property and facility surveys</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A, 1D													
D. <i>Training</i>	OCDC, RCOC, OCP, OCIA, OCFM	1	1A, 1D													
E. <i>Reporting</i>	OCDC, RCOC, OCP, OCIA, OCFM	1,3	1A, 1D													
Objective 5 <i>Develop a procedure and schedule for surveying county road drainage and storm water drainage systems for illicit discharges from unknown point sources</i>																
A. <i>Amend procedures for road drainage and storm drain system surveys</i>	OCDC, RCOC	1,4	1A													
B. <i>Prioritization and scheduling of road drainage and storm drain system surveys.</i>	OCDC, RCOC	1,3	1A													
C. <i>Staff, training and equipment</i>	OCDC, RCOC	1	1A													

Objective 6 <i>Investigation of illicit discharges and elimination of Illicit Connections identified during dry weather screening activities, drain surveys, and complaint investigations</i>				1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
A. Investigation of illicit discharge sources	OCDC, RCOC	1	1A												
B. Identification and elimination of illicit connections	OCDC, RCOC, OCHD	1	1A												
C. Develop procedures for illicit discharges identified from county facilities	OCDC, RCOC, OCPR, OCIA, OCFM	1,3	1D												
D. Training	OCDC, RCOC, OCPR, OCIA, OCFM	1	1A,1D												
Objective 7 <i>Continue to promote and improve citizen complaint programs</i>				1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
A. Continue to provide 24 Hour Environmental Hotline Services	OCDC	1,2,3	1E												
B. Update and Implement Oakland County Hotline Program.	OCDC	1	1E												
C. Publicize Hotline Program to staff and county Residents	OCDC	1	1E												
Objective 8 <i>Programs to address OSDS and sanitary sewer discharges</i>				1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
A. Oakland County Health Division OSDS Instillation and Enforcement	OCHD	1,2	1B												
B. Oakland County OSDS Program	OCHD	2	1B												
C. Sanitary Sewer maintenance and inspections	OCDC	1,2	1A												
Objective 9 <i>Programs to prevent illicit connections</i>				1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
A. Verify new connections, and prevent illicit connections	OCDC	1,3	1A												