



Michigan Municipal Separate Storm Sewer System (MS4) Permit Illicit Discharge Elimination Plan/Program

Illicit Discharge Elimination Plan/Program

The Illicit Discharge Elimination Plan/Program (IDEP) is a program that is designed to detect and eliminate illicit discharges and connections, to the Municipal Separate Storm Sewer System (MS4) owned or operated by the permittee. The IDEP compliance assistance document addresses in detail the following four permit requirements:

- An ordinance or other regulatory mechanism to effectively prohibit illicit discharges into the MS4 owned or operated by the permittee and to implement appropriate enforcement actions;
- A program to find and eliminate illicit connections and discharges to the MS4 from commercial, private educational, public, and residential sources;
- A program to train staff employed by the permittee who are involved in illicit discharge-related activities, or who have field jobs with the potential for witnessing illicit discharges and connections; and
- A method for determining the effectiveness of the illicit discharge elimination program.

The compliance assistance document includes the key components relating to these four requirements, which are considered necessary in an approvable IDEP. Each component includes a list of required and recommended activities that are often used to meet these requirements. Alternatives are allowed for any standard permit requirements under the MS4 Watershed General Permit; however alternatives are only allowed for the plan and procedures to perform dry-weather screening under the MS4 Jurisdictional General Permit. Additional information on submitting an alternative can be found in the compliance assistance document titled *Storm Water Pollution Prevention Initiative and Storm Water Management Program Alternative Approaches*.

The term separate storm sewer system includes both open and enclosed drainage systems that are owned or operated by the permittee and discharge either directly to a surface water of the state or a separate storm water drainage system owned or operated by another public body.

An MS4 can be waters of the state; however not all MS4s are waters of the state and vice versa. The Michigan Water Quality Standards define surface waters of the state to include lakes, rivers, streams, open drains, and wetlands. There are areas where both the definition of an MS4 and waters of the state may be met. Department of Natural Resources and Environment staff is available to provide assistance when evaluating the applicability of the definitions. An example of when both definitions may apply is a designated county drain. A designated county drain that is considered part of the county's MS4 may also be considered surface waters of the state.

The appropriate IDEP activities for these drains are the same as they would be for any part of the MS4. Appropriate activities include identifying the discharge points where the permittee's separate storm sewers discharge to surface waters of the state, and performing dry-weather screening at those discharge points. This includes discharge points where an enclosed county drain discharges to surface waters of the state and where an open county drain ultimately discharges to surface waters of the state. Privately owned and operated drainage systems that discharge directly to surface waters of the state do not have to be included in the IDEP.

For the Watershed General Permit, the IDEP shall be designed and implemented to carry out actions where the permittee owns and operates MS4s in the regulated area. For the Jurisdictional General Permit, the IDEP shall be designed and implemented to carry out actions where the permittee owns and operates MS4s in the urbanized area. Additional information on the geographic extent of the IDEP requirements can be found in the compliance assistance document titled *Scope of the Storm Water Pollution Prevention Initiative and Storm Water Management Program*.

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