

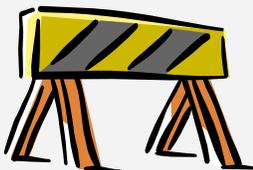
From Brenda O'Brien, Engineer of Construction and Technology

MDOT-Construction and
Technology Support Area
P.O. Box 30049
Lansing, Michigan 48909
Phone/517-322-1087
Fax/517-322-5664
www.michigan.gov/mdot/

Index: Environment

Questions regarding this
Construction Advisory
should be directed to:

Judy Ruszkowski,
Operations Environmental
Stewardship Engineer,
517-322-5698 or
ruszkowskij@michigan.gov



BJO:JAR

Reporting Illicit Discharges and Illicit Connections

MDOT's Statewide Storm Water Discharge Permit requires the department to have a process in place to receive and respond to reports of illicit discharges/connections (ID/C) to our storm water drainage system.

Illicit Connections are any physical connection to MDOT's drainage system that 1.) conveys an illicit discharge or 2.) is not authorized or permitted by MDOT where such authorization or permit is required.

Illicit Discharges are any discharge or seepage into MDOT's drainage system that is not composed entirely of storm water, and which is not specifically exempt under MDOT's statewide permit.

MDOT's Illicit Discharge Elimination Program (IDEP) implementation team worked with our storm water consultant, Tetra Tech, to develop a database to record and track the status of all reported ID/Cs. Each region has designated one individual to serve as the IDEP Coordinator to ensure all reported ID/Cs are entered into the database for follow-up. In most regions, this person is also the Storm Water Coordinator.

Construction staff is

reminded to follow BOH-IM 2004-10, *Illicit Discharge Elimination Program Procedure*, whenever a possible ID/C is encountered during the construction phase of a project. The procedure is summarized here.

1. The contractor notifies the MDOT staff when they encounter a suspected ID/C during construction. Examples are an unidentified pipe within a drainage structure or entering a ditch.
2. Contact the resource specialist, Storm Water Coordinator or the IDEP Coordinator for the region, if necessary, to assist in determining if an emergency situation exists. Examples of an emergency situation include untreated sewage, or strong chemical or fuel smell from the discharge flowing to our drainage system.
3. If an emergency situation does exist, MDOT staff must contact the Pollution Emergency Alert System (PEAS) at 1-800-292-4706 to notify MDEQ of the emergency.
4. If no emergency exists, attempt to determine the source of the discharge based on the surrounding land use and observable characteristics of the discharge, or direction of the pipe or other conveyance. Examples of non-emergency ID/Cs may include roof drains or sump pump discharges entering our storm water drainage system.
5. If you are unable to identify the source in a reasonable amount of time, record all observations about the discharge before continuing with construction in that area. Report this information to your region IDEP Coordinator so it can be entered into the IDEP database for tracking and, if necessary, follow up.
6. The IDEP Coordinator will then work with the TSC to identify the source and notify all appropriate agencies, following established procedures.

Remember, MDOT is required, as a condition of our storm water discharge permit, to document and follow

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up on all ID/Cs that we are made aware of on our right-of-way. Most ID/Cs to our storm water drainage system discovered during construction originates from off our right-of-way. In this case, MDOT will refer the situation to the local health department, MDEQ or other regulatory agency. MDOT will then cooperate in any further investigation by these

agencies where access to our right-of-way may be needed.

If you have any questions on how to report an illicit discharge or illicit connection, or if you would like to receive additional information on our permit requirements contact your region IDEP Coordinator listed here:

Superior Region – Dan Hamlin
North Region – Mike Rogers or Gary Niemi
Grand Region – Steve Houtteman
Bay Region – Cary Rouse
Southwest Region – Nick VanWoert
University Region – Bob Batt
Metro Region – Randy McKinney