5. Illicit Discharge Elimination Program BMPs

5.1. Overview

This chapter describes the illicit discharge elimination program BMPs implemented by MDOT, and any changes that have occurred with this program during the reporting period. Additional information on MDOT's illicit discharge elimination program BMPs is included in the Storm Water Management Plan (SWMP). The organization of this chapter is as follows:

- Section 5.2. describes the status of implementation of the BMPs that were described in the SWMP.
- Section 5.3. contains the schedule for further implementation of the BMPs.

5.2. BMP Status and Measurable Goals

Each of the following sections will discuss the status of the BMPs identified and described in the SWMP and the measurable goals that were obtained over the reporting period. See Section 5.2.3 for more information.

5.2.1. BMP Changes

Measurable Goals in Table 5-2 were changed to allow another year to finish implementation of the Illicit Discharge Elimination Program (IDEP) follow up identification and elimination program of newly discovered problems.

5.2.2. Dry Weather Field Screening

A consultant contractor working for MDOT completed an extensive dry weather screening program for all outfalls located in the five Phase I communities. A total of 366 outfalls have been identified with the discovery of only 6 illicit connections and 4 illicit discharges were found to be directly discharging to the MDOT storm sewer system. Four other illicit connections found were connected to a municipal system, which was connected to the MDOT system. Hence, approximately 3 percent (10 out of 366) of MDOT's outfalls have been identified with possible illicit connections directly discharging to the MDOT system.

5.2.3. Follow-Up Identification and Elimination Program

MDOT has undertaken a program to identify and correct the source of any illicit discharges or connections that were identified during the field screening process for the five Phase I communities. To date, 99.7 percent of the Phase I IDEP work is complete.

In the City of Ann Arbor, follow-up work is being conducted on an outfall, based on information that was found during review of the database, which showed that high levels of *E. coli* were present. Work is actively being conducted to isolate the source. All other illicit connections have been removed in the City of Ann Arbor. Due to this follow-up work, an extra year of implementation was added to Table 5-2.

In the City of Flint six illicit connections have been identified. Two of these connections originate from the City of Flint. The City of Flint was notified of these problems and has removed one connection to date. The additional four connections were addressed initially by MDOT, but after a lack of action on the part of the landowner, these four problems were handed over to the MDEQ for enforcement.

The City of Grand Rapids has addressed the illicit discharges and connections identified within the city limits. No further actions are needed in the City of Grand Rapids.

In the City of Warren, three illicit discharges were identified and still active during this reporting period. The City has addressed two of these illicit discharges and is continuing to search for the source of the third discharge.

The City of Sterling Heights did not have any illicit connections.

Additional detail and information of each of the illicit discharges and connections is provided in Chapter 10 for each Phase I community.

5.2.4. Preventing Future Illicit Connections and Discharges

The most important task in preventing or minimizing future illicit connections and discharges is public and internal education programs, guidance, and policies. Chapter 3 of this document describes MDOT's public and internal education efforts.

MDOT formed a focus group to work on legal requirements to prevent future sewer tap-ins or cross connections into MDOT's storm sewer system. The following is a brief description of the work accomplished by this group over the reporting period.

In order to update requirements to prevent future illicit connections, MDOT has compiled drainage information from many separate manuals into the Drainage Manual to be used on all MDOT projects. This manual contains specific criteria for the identification and elimination of existing cross-connections between sanitary and storm sewer systems, and the prevention of future cross-connections.

As stated in Section 6.2.3 of the SWMP, MDOT has the legal authority to prevent or minimize future illicit connections derived from state statutes. This legal authority, as outlined in the MDOT Construction Permit Manual Section 9.13, provides MDOT with the legal mechanisms to control construction site and other industrial discharges to the MS4. This section of the manual has been updated to reflect needed changes to assure MDOT employees all follow the same procedure when a potential illicit discharge or connection is discovered. Refer to Appendix E for a copy of the revised Section 9.13.

In order to evaluate how effective this program is, several measurable goals have been established. The results of the measurable goals are included below in Table 5-1.

Table 5-1 Preventing Future Illicit Connections and Discharges Measurable Goals

Measurable Goals	Type	Results
Report status of the changes on the Construction Permit Manual	Revisions	Complete
Report status on the development of a new description of the permit process	Revisions	Complete

5.3. Implementation Schedule

MDOT will continue to implement these BMPs and will begin work consistent with the MDOT SWMP for the Phase I communities. The following Table 5-2 is an estimated implementation schedule for all of the actions needed to fulfill the BMPs discussed in this chapter for illicit discharge elimination program.

Table 5-2 Implementation Schedule for Illicit Discharge Elimination Program BMPs

Section No.	Action	Completed for Phase I Communities	Year of Implementation			
			2002	2003	2004	2005
5.2.2	**Dry Weather Field Screening**					
	Complete initial screening of outfalls	X				
5.2.3	**Follow-Up Identification and Elimination Program**					
	Follow-up Investigation		X	X		
5.2.4	**Preventing Future Illicit Connections and Eliminations**					
	Completion of the Drainage Design Manual	X				
	Update MDOT's Construction Permit Manual	X				
	Examine legal methods and options for notification of permit changes		X	X		
	Choose appropriate legal methods and options		X	X		
	Identify changes in data entry and reporting		X	X		
	Implement changes in data entry and reporting		X	X		
	Develop new description of permit process		X	X		
	Distribute new description of permit process		X	X		