

Maintenance Advisory

January 12, 2009

From Jon W. Reincke, Engineer of Operations

MDOT
Division of Operations
Maintenance
6333 Old Lansing Road
Lansing, MI 48917

For questions regarding
this advisory, contact:

Corey Rogers, Engineer
Emergency Support Unit
Phone: 517-322-3320
RogersC@michigan.gov

Judy Ruskowski,
Operations
Environmental Engineer
Phone: 517-322-5698
RuskowskiJ@michigan.gov



Illicit Discharges

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

Illicit Connections are physical connections (an open ditch or pipe) to MDOT's drainage system that conveys an illicit discharge or are not authorized or permitted by MDOT where such authorization or permit is required.

MDOT maintains a database to record and track the status of all reported ID/Cs. One individual in each region is designated as the Illicit Discharge Elimination Program (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.

Maintenance staff may encounter ID/Cs while performing routine activities such as ditch clean-outs, mowing, or picking up litter. If you suspect or encounter an ID/C, it is important to take action and follow BOHIM 2004-10, *Illicit Discharge Elimination Program Procedure*. The procedure is summarized below.

1. **OBSERVE & RECORD.** Maintenance crews encounter a suspected ID/C while working in the field. Examples of ID/Cs are unidentified pipes or flow entering a drainage structure or a ditch. Record basic information about the ID/C including location, characteristics (color, smell, texture), amount of flow, size of pipe, etc. If possible, take a photograph.
2. **EMERGENCY.** Determine if an emergency situation exists. If the situation appears to pose immediate danger to public health or the environment, contact the Pollution Emergency Alert System (PEAS) at 1-800-292-4706 or call 911 to notify MDEQ of the emergency. Then notify your supervisor, MDOT TSC Manager or Maintenance Coordinator (for contracted areas) and the region IDEP Coordinator.
3. **SOURCE.** If no emergency exists, attempt to determine the likely source of the discharge based on the surrounding land use and observable characteristics of the discharge and direction of the flow/pipe. Examples of nonemergency ID/Cs may include wash water from laundromats or floor drains.

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4. **REPORT.** If you are unable to identify the source in a reasonable amount of time, finish recording all observations about the discharge before continuing with maintenance in that area. Report this information to your region IDEP Coordinator, MDOT TSC Manager or Maintenance Coordinator so it can be entered into the IDEP database for tracking and follow up, if necessary.

5. **FOLLOW-UP.** The IDEP Coordinator will work with the Maintenance Area/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 up on all ID/Cs that we encounter or are made aware of on our right-of-way. Most ID/Cs to our storm water drainage system originate from outside our right-of-way. In this case, MDOT refers 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.

Do not prohibit the following non storm-water discharges in accordance with Part I.A.6.b.3., unless the permittee identifies them as significant contributors of pollutants:

- Water line flushing and discharges of potable water sources
- Landscape irrigation runoff, lawn watering runoff, and irrigation waters
- Diverted stream flows and flows from riparian habitats and wetlands
- Rising groundwaters and springs
- Uncontaminated groundwater infiltration [as defined by 40 CFR 35.2005(20)]
- Pumped groundwaters (except for groundwater cleanups not specifically authorized by NPDES permits), foundation drains, water from crawlspace pumps; footing drains, and basement sump pumps
- Air conditioning condensates
- Waters from noncommercial car washing
- Residual street wash waters
- Discharges or flows from emergency fire fighting activities
- Dechlorinated swimming pool waters from single, two, or three family residences. Water from a swimming pool operated by the permittee shall not be discharged to a separate storm sewer or to the surface waters of the state without specific NPDES permit authorization from the department.