

What You Must Do.....

For Illicit Discharge Programs under the Small MS4 Program

November 19, 2007
Ohio EPA Storm Water Education Workshop #2



What is an illicit discharge?



Illicit Discharge Program Goals – You Must.....

- Develop a proactive, on-going program
 - Detect
 - Eliminate
- Detect by
 - Taking an inventory of the MS4 system
 - Dry weather screening of outfalls
 - Training on identifying illicit discharges
 - Encouraging complaints



Illicit Discharge Program Goals – You Must.....



- Eliminate by
 - Passing ordinance to prohibit illicit discharges
 - Enforcing the ordinance
 - Disconnecting sources
 - Developing a maintenance and repair program

Expectations for Required Elements – You Must.....

- Ordinance or Resolution
 - Passed by Permit Issuance Date 2008
 - Models available from Chagrin River Watershed Partners or www.stormwatercenter.net
- Map of Outfalls to MS4
 - Completed by Permit Issuance Date 2008
 - 100% of outfalls identified



What is an Outfall?



Expectations for Required Elements – You Must.....

- Dry Weather Screening
 - All mapped outfalls to be screened at least once during 5-year permit term
 - Develop protocol to trace source of illicit discharge
 - Cuyahoga Co Board of Health manual
 - Develop plan to address discharge

Expectations for Required Elements – You Must.....

- Home Septic Treatment Systems (HSTS)
 - All systems that discharge to MS4 identified and mapped
 - All failing on-lot systems
- Plan to address the problem
 - Connection to sanitary sewers, where feasible, is preferred



Expectations for Required Elements – You Must.....

- Address open dumping and spills
- Develop education programs for public, businesses and community employees
- May allow “occasional incidental non-storm water discharges”



Illicit Discharge Program Goals – You Have the Authority.....

- Municipalities
 - have the authority to implement every program required by the MS4 Permit
- Townships and Counties
 - Have some limitations on authorities
 - They can locate and map outfalls, perform dry weather screening, identify illicit discharges and report them to appropriate agencies for resolution
 - Develop protocol (flow chart) of program

Expectations for Required Elements – You Must.....

- Be prepared to respond when Ohio EPA or others call about how YOU are responding to illicit discharges
- Be prepared to report the results of your investigations and enforcement actions to Ohio EPA



OEPA Storm Water Program Update

- OEPA and USEPA have initiated audits of MS4 Storm Water Programs. Any enforcement actions/fines will be based on how well or how poorly a community complies with their SW NPDES Permit.
- Remember, all MS4 communities must have all their storm water BMPs, including all programs, ordinances, etc. in place by early 2008!

For More Information

Websites

Ohio EPA

www.epa.state.oh.us/dsw/storm/index.html

USEPA

http://cfpub.epa.gov/npdes/home.cfm?program_id=6

Ohio EPA Northeast District Office

Columbiana, Cuyahoga, Lake, Lorain, Mahoning, Stark & Wayne Counties

Dan Bogoevski (330) 963-1145

dan.bogoevski@epa.state.oh.us

Summit and Portage Counties

Kelvin Rogers (330) 963-1117

kelvin.rogers@epa.state.oh.us

Ashtabula, Geauga, Medina and Trumbull Counties

Chris Moody (330) 963-1118

chris.moody@epa.state.oh.us