

**MICHIGAN DEPARTMENT OF ENVIRONMENTAL
QUALITY**

**GENERAL STORM WATER PERMIT
MIG619000**

ILLICIT DISCHARGE ELIMINATION PLAN

FOR

**LIVINGSTON COUNTY DRAIN COMMISSIONER
Brian Jonckheere**

Table of Contents

<i>Section I</i>	<i>Objectives and Planned Efforts</i>	<i>I-1</i>
<i>Section II</i>	<i>Plan Summary</i>	<i>II-1</i>
<i>Section III</i>	<i>Plan Evaluation and Update</i>	<i>III-1</i>

Section I - Objectives and Planned Efforts

Illicit Discharge Elimination Plan (IDEP) Objectives

The purpose of the IDEP is to develop a program to prohibit and effectively eliminate illicit discharges and connections to storm water conveyances under the jurisdiction of the Livingston County Drain Commissioner (LCDC). The federal law defines “illicit discharge” and “illicit connection” as follows:

Illicit discharge – the discharge of untreated sanitary wastewater (including industrial and commercial wastewater) or other polluting materials into a river, stream or other waterbody from: improper sewage connections – such as sources of sanitary sewage which should be connected to the sanitary sewer but are inappropriately connected to the storm sewer; effluent from improperly designed and/or operated septic systems; sanitary sewer overflows; improper disposal of waste products – such as emptying a mobile home holding tank into a catch basin or pouring used motor oil into a catch basin; other discharges not composed entirely of storm water (except as specified in the permit).

Illicit connection – an improper physical connection of illicit discharges to the storm water drainage system, or other connections not authorized by the local authority (where required), to the storm water drainage system. Examples of illicit connections are: a) a floor drain in an automobile repair shop that is connected to the storm sewer rather than the sanitary sewer; and b) a septic tank discharge line that has been connected to the storm sewer. An improper connection of a source of storm water to the sanitary sewer would also be considered an illicit connection – for example, a parking lot catch basin that is tapped into the sanitary sewer. Illicit connections refer to a physical connection to the drainage system that either: primarily conveys illicit discharges into the storm sewer system, or is not authorized or permitted by the local authority, if required.

The main objectives of the LCDC IDEP are to: 1) locate and accurately map the storm water conveyances and outfalls under the Drain Commissioner’s jurisdiction, 2) train LCDC staff on illicit connections and discharges, 3) implement a system for identifying and eliminating illicit discharges and connections including observations/screenings, 4) develop a complaint response and referral system, 5) coordinate the efforts of other agencies and local communities on the development and implementation of an on-site sewage disposal (OSDS) program and, 6) coordinate the efforts of the local communities and the other impacted County agencies such as the Livingston County Road Commission (LCRC) in the implementation of their IDEPs and related activities.

The LCDC and Livingston County

The Drain Commissioner maintains approximately 400 drains in Livingston County. The drainage in the County is mainly to the Huron River, Shiawassee River and Red Cedar River watersheds with a small portion in the northwest corner of the County going to the Looking Glass River. Figure 1 is a map of Livingston County showing the county drains, waterbodies, watershed boundaries, community boundaries and major roads. The office of the Drain Commissioner, headed by Mr. Brian Jonckheere,

provides a variety of services in the County, including: storm water drainage services, wastewater treatment operations, soil erosion and sedimentation control, public works, rain gauge networking, lake level evaluations, lake improvements and environmental and watershed initiatives.

Approximately 80% of Livingston County residents utilize private household wells for their drinking water and about 70% of the County's residents utilize private septic systems, on-site disposal systems (OSDS), for disposal and treatment of their wastewater. The majority of the land use in the County is agricultural although there is considerable residential and commercial use along the I-96 and US-23 roadway corridors (Figure 2).

The storm water conveyance system under the jurisdiction of the LCDC is intertwined with storm water systems under the ownership and/or jurisdiction of several different entities, including, the Michigan Department of Transportation (MDOT), the LCRC, local communities, and private entities like subdivisions and local school districts. During IDEP inspections, the LCDC may discover drains of unknown ownership. Although these "orphan drains" are uncommon in the County, the LCDC will make an effort to determine the ownership and jurisdiction of these drains. Where appropriate, they will initiate a process to take jurisdiction of the unclaimed storm water conveyances in the County.

The LCDC's storm water conveyance system and the locations of known storm water outfalls are shown in Figure 1. Table 1 is a list of those known outfalls that gives their locations, their sizes, and the type of area they serve (i.e. agricultural, residential, commercial, etc.). This information will be verified as the IDEP is implemented. Many of the conveyances are not "separate" storm sewers but rather they carry natural base flow and are not technically subject to the Phase II regulations. The presence of natural base flow will be verified during the IDEP implementation.

Planned Efforts

The following subsections summarize the four required elements of an IDEP as specified in Part I, Section A.3.a of the MDEQ Watershed Option General Storm Water Permit (MIG619000) and the LCDC's plans for addressing each element. The LCDC is committed to beginning the IDEP within 90 days of final submittal and to completing activities to meet each of the required elements within five years of Certificate of Coverage (COC) issuance. The actions completed will comply with the regulations and plan objectives and are summarized and tabulated in Section II of this plan. **Requirements 1 and 3 have been combined and addressed as one in this IDEP as the tasks to meet the two requirements overlap.**

- 1. Develop and implement a program to find and eliminate illicit discharges and illicit connections found during dry weather screening.*
-
- 3. Develop a method for determining the effectiveness of the illicit discharge elimination activities which shall, at a minimum, result in the inspection of each storm water point source every five years unless an alternative schedule is approved by the MDEQ.*

- Task 1.1:** **Review existing LCDC legal authority to implement the IDEP.**
Description: The LCDC must have adequate legal authority and enforcement capability to allow it to find, track and eliminate illicit within County drains. The LCDC will conduct a thorough review of its Drain Code to ensure that their existing legal authority is adequate.
Responsibility: LCDC
Measure: Documentation of review and written recommendations
Schedule: Review complete in 1st year
- Task 1.2:** **Develop adequate legal authority, if necessary.**
Description: If needed, based on the recommendations of Task 1.1, the Drain Code will be modified to allow the LCDC to implement the IDEP. Model ordinances will be utilized to provide wording for any amendments that may be necessary.
Responsibility: LCDC
Measure: Documentation of adoption of amendments
Schedule: Adoption complete in 4th year
- Task 1.3:** **Develop a complaint receipt and response system.**
Description: The LCDC is in the process of developing a system to receive and track complaints regarding storm water, construction site and OSDS issues in the County. The LCDC will investigate utilizing the existing computerized complaint tracking system that is used by the Livingston County Department of Public Health (LCDPH) and will attempt to coordinate the effort of the County agencies and local communities so that one system can serve all. The LCDC will ensure that a program is in place to publish the complaint system telephone number and e-mail address in newspapers, posters, mailings and on the County web site.
Responsibility: LCDC
Measure: Documentation of development and use of the system
Schedule: Complete in 1st year
- Task 1.4:** **Review the existing water quality data for drains and waterbodies in the County.**
Description: The LCDC will obtain and review the available water quality data for the County drains and other waterbodies as appropriate. Possible sources are LCDC records, Michigan Department of Environmental Quality (MDEQ), the Huron River Watershed Council (HRWC), local universities and local communities. The review will be used to assist the LCDC in prioritizing actions for the IDEP.
Responsibility: LCDC
Measure: Documentation of review and recommendations
Schedule: Complete in 1st year
- Task 1.5:** **Develop a priority schedule for the inspection of the LCDC drains and outfalls.**
Description: The LCDC will use the data review (Task 1.4), knowledge of problem areas, existing work/inspection schedule, location of urbanized areas and other criteria to prioritize the inspection of the LCDC drains and outfalls. The schedule will include inspection of the highest priority outfalls in Year 2 and evaluation of all remaining drains and outfalls within 5 years of IDEP submittal, or other

schedule as approved. For the purposes of this plan, “outfall” and “point source” are defined as the point at which a storm water conveyance under the jurisdiction of one entity discharges into a natural waterbody, wetland, upland, or into a conveyance or property under the jurisdiction of another entity. During visual observations or sampling, in instances where the storm water outfall is submerged, the outfall is connected to another enclosed conveyance or otherwise inaccessible, the LCDC will inspect the nearest upstream manhole or access point.

Responsibility: LCDC
Measure: A written inspection schedule
Schedule: Complete prioritization in 1st year

Task 1.6: Visual dry-weather inspection of the storm water outfalls at County-owned offices/facilities and follow-up investigation and correction of any problems.

Description: The LCDC will coordinate the inspection of the outfalls from the storm water conveyances at the County Office, the Annex and other County-owned facilities to identify any illicit discharges or connections. Any problems that are found will be corrected within 6 months of discovery or other schedule as approved. The procedures to be used in the inspections are detailed in Tasks 1.9 and 1.10. The inspections will be repeated every five years.

Responsibility: LCDC
Measure: Records of inspections and corrections
Schedule: Complete inspections and corrections in 2nd year

Task 1.7: Investigate the feasibility of coordinating the drainage system and outfall inspection efforts of the other agencies and the local communities in the County.

Description: The LCDC will meet with the local communities, the LCRC and other appropriate agencies to attempt to coordinate drain and outfall inspections in an effort to eliminate duplication, reduce costs and provide consistency.

Responsibility: LCDC
Measure: Meeting minutes, conclusions and recommendations
Schedule: Complete in 1st year

Task 1.8: Provide training to the LCDC and other County staff on illicit connections and discharges. Determine the feasibility of coordinating the training with the other agencies and the local communities in the State.

Description: The LCDC will provide training on illicit connections and discharges and the IDEP to appropriate LCDC and other County agency staff. The LCDC will meet with the local communities and the LCRC to attempt to coordinate IDEP training in the County as an individual or coordinated effort.

Responsibility: LCDC
Measure: Meeting minutes, conclusions and recommendations. Training records.
Schedule: Complete in 1st year

Task 1.9: Perform visual inspections and dry weather screenings of all LCDC-owned and/or operated storm water conveyance outfalls.

Description: Based on the schedule developed in Task 1.5, visual inspections will be conducted of each of the LCDC's known outfalls, shown in Figure 2, during dry weather. In instances where the outfall is submerged, the outfall is connected to another enclosed sewer, or is otherwise inaccessible, the LCDC will visually inspect the nearest upstream accessible location.

Dry weather inspections are defined as those conducted when no rain/precipitation event has occurred for a minimum of 48 hours. If flow is observed in the sewer at that time, it will be determined if the flow is natural base flow or possibly due to illicit discharges.

Responsibility: LCDC

Measure: Documentation of findings and observations. Number of possible illicit discharges discovered.

Schedule: Inspect highest priority outfalls in 2nd year and complete all evaluations by the 4th year; repeat visual inspection every 5 years or other schedule as approved by the MDEQ.

Task 1.10: Trace illicit and owner notification.

Description: Trace suspected illicit discharges that are found in Task 1.9 to their source using the techniques described below and notify the owner or responsible jurisdiction of the problem in writing.

If the illicit is a direct discharge to a County Drain then the LCDC will direct the owner of the source to eliminate the illicit connection/discharge within a specified timeframe and require a notification of correction.

If the illicit is discharging to another jurisdiction's storm water conveyance and reaches a LCDC conveyance indirectly, then the LCDC will request the owner of the system to provide updates on their investigation and inform the LCDC when the connection has been eliminated. The timeframe for eliminating the connection/discharge will depend on the type and significance of the illicit connection/discharge, and the expense and difficulty in repair.

The goal of the plan is to have most illicit connections/discharges under LCDC jurisdiction eliminated within 6 months of notification. Illicit connections/discharges that are more complex may take considerably longer than 6 months to eliminate.

Tracing techniques – All storm outfalls that are discharging during dry-weather will be investigated further. The LCDC may be able to determine the source of a dry-weather discharge solely through visual observation. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may provide clues to the source of the discharge without additional sampling. As needed, sampling, dye and/or smoke testing, as-built plan review, or other investigative techniques will be used to determine the nature and source of the flow.

1. Televising – The LCDC may elect to televise those enclosed storm sewers that have suspicious flows to identify pollutant sources that cannot be located through simple visual observation and/or sampling. For example, the LCDC may determine through visual observation and/or sampling that an illicit connection exists between two specific manholes. Video inspection of the stretch of storm sewer between these two manholes could be used to isolate the exact source of the connection/discharge.

2. As-built plan review – Where available, the LCDC will utilize as-built pipe schematic drawings as a tool to determine the source of an illicit connection/discharge.
3. Dye or smoke testing – The LCDC will conduct physical inspection of commercial and/or residential facilities as needed to verify suspected illicit connections that are detected through visual observations/sampling of yards, outfalls and manholes. As necessary, facility inspections will include dye or smoke testing of suspect facility plumbing fixtures to determine if the fixture discharges to the sanitary system or to the storm sewer. All facility inspections will be documented.
4. Sampling – Investigation of dry weather discharges will be prioritized based on the number of discharges identified, as well as other factors including: location, volume of flow, and suspected contaminants based on color, turbidity, or odor. If flow is observed during the dry weather outfall inspections but visual observations do not lead to a source, the LCDC may decide to sample the flow for pollutant parameters typically found in illicit connections. Sampling can rule out some dry weather discharges such as groundwater. The sampling will typically begin at the outfall and continue upstream from access site to access site until a source is found. The choice of sampling parameters will depend on several factors including:
 - Location of the storm outfall (i.e. in residential or commercial area);
 - Turbidity and color of discharge which could distinguish between an illicit discharge from a commercial establishment versus a residence;
 - Odor associated with discharge such as petroleum odor, or raw sewage odor.

The LCDC may choose to analyze the samples for some or all of the following parameters:

Parameters	Found In	Potential Source(s)
<i>Escherichia coli</i>	Sewage	Human or Animal Waste
Surfactants	Soap, Emulsifiers	Industrial/Commercial/ Residential
Ammonia	Sewage, Fertilizers, Industrial Chemicals	Industrial/Residential/ Agricultural
Nitrates	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/ Residential/Agricultural
Nitrites	Sewage, Fertilizers, Industrial Chemicals	Fertilizers/ Industrial/ Residential/Agricultural
Conductivity	Industrial Waste, Sewage, Salt	Industrial/ Residential/ Agricultural

Parameters	Found In	Potential Source(s)
Total Dissolved Solids	Industrial Waste, Sewage, Salt	Industrial/Residential/ Agricultural
Temperature	Cooling Water, Sewage	Industrial/ Residential
pH	Acids and Bases	Industrial/ Residential

5. The LCDC may elect to conduct wet weather observations of some outfalls to determine if runoff from certain areas is contaminated. For instance, oil sheen at the outfall may indicate illicit disposal of oils or grease upstream in the service area. All outfall inspections will be documented.

Responsibility: LCDC
Measure: Number of illicit traced and documentation of notification and elimination.
Schedule: Begin in 2nd year and continue until all illicit traced.

Task 1.11: **Follow-up enforcement for non-correction.**
Description: The LCDC will follow up with the owner of the source of an illicit discharge that is going directly to an LCDC drain to ensure that the connection/discharge has been eliminated. If the illicit has not been eliminated, the LCDC will use its legal authority to obtain compliance. If the illicit discharge is an indirect source the LCDC will coordinate follow-up and enforcement with the jurisdiction in which the discharge originates.

Responsibility: LCDC
Measure: Documentation of enforcement actions. Number of illicit found versus number eliminated.
Schedule: Begin in 2nd year after legal authority is developed and continue as needed.

Task 1.12: **Investigate the feasibility/benefit of conducting baseline and then follow-up water quality monitoring in select drains and waterbodies in the County.**
Description: The LCDC will investigate the feasibility and benefit of conducting baseline and periodic follow-up water quality monitoring in select drains and waterbodies in the County. The monitoring may provide a measure of the effectiveness of the IDEP. The LCDC will look at costs versus value of information obtained and decide if monitoring will be added as an additional IDEP task.

Responsibility: LCDC
Measure: Documentation of evaluation, conclusions and recommendations.
Schedule: Complete evaluation in 2nd year if grant money is available and, if found to be of value, will add monitoring to implementation schedule.

Task 1.13: **Notify proper jurisdictions of illicit discharges or connections found by LCDC staff.**
Description: During the course of normal business, LCDC staff may observe or be advised of illicit connections or discharges that are not under the LCDC's jurisdiction. The LCDC will notify the owner or agency with jurisdiction and record the notification. The LCDC will report any identified significant illicit discharges including those of untreated or partially treated sewage to the MDEQ within 24 hours after the discharge begins or is discovered and of corrective actions being

taken to eliminate the connection/discharge. The reports will cover the information required by the General Permit and COC. If the discharge is from a separate sanitary overflow of sewage, the LCDC will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended including the notification of the local health department and daily newspaper and the use of the MDEQ web-based form. (www.deq.state.mi.us/documents/deq-swq-csosso-eqp5857.doc).

The LCDC will submit an annual report to MDEQ summarizing the activities completed including illicit connections and discharges the LCDC identified and corrected. For significant illicit discharges, the LCDC will list the pollutants of concern, the estimated load and volume discharged, and the locations of the discharge into the system and to the waters of the state. For unresolved sewage discharges that are the responsibility of the LCDC, the report will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended.

Responsibility: LCDC
Measure: Documentation of the notification.
Schedule: 1st year and ongoing

2. *Develop and implement a program to minimize seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the applicant's separate storm water drainage system.*

Task 2.1: Encourage the use of the existing OSDS complaint tracking system.

Description: The LCDC has no OSDS under its jurisdiction; however, LCDC will ensure that there is a program (See Task 1.3.) to encourage citizens to utilize the existing LCDPH complaint tracking system or other system as appropriate and investigate the use of the system to handle storm water program-related complaints. The LCDPH system is well publicized and utilized. It includes:

- Telephone complaint system with emergency number for non-business hours.
- Complaint documentation and tracking system.
- Follow-up notification to reporting citizen to inform them what corrective actions have been or are being taken.

Currently, when the LCDC receives complaints regarding illicit discharges, they are passed on to the LCDPH and that practice will be continued.

Responsibility: LCDC
Measure: Documentation of efforts to encourage use and records of use of the system.
Schedule: Investigate building on to the LCDPH complaint, tracking and response system in 1st year.

Task 2.2: Work with LCDPH and local communities on OSDS inspection program.

Description: The LCDC will work with the LCDPH and the local communities on developing a program whereby OSDS would be periodically inspected for failure. They will participate in any evaluation of regulatory or other avenues to best accomplish the goal. Currently, all new construction and repairs for OSDS are permitted through the LCDPH.

Responsibility: LCDC

Measure: Minutes of meetings and documentation of efforts. Documentation of conclusions and recommendations.

Schedule: Begin cooperative investigation in 2nd year and make recommendations in 4th year.

Task 2.3: Evaluate the integrity of the separate sanitary systems at LCDC and County facilities.

Description: The LCDC will coordinate the evaluation of the sanitary systems, sewers and OSDS at LCDC and County-owned and operated facilities to ensure that seepage into the groundwater and surface water is minimized. The evaluation may include visual inspection, flow record review, sewer televising and other means as appropriate.

Responsibility: LCDC

Measure: Report of findings, corrections and/or recommendations.

Schedule: Begin evaluation in 3rd year and complete report in the 4th year with periodic review.

3. *(Combined with Requirement 1)*

4. *Prepare an updated map of the location of each known storm water point source and the respective receiving water or drainage system.*

Task 4.1: Evaluate the use of Global Positioning System (GPS) equipment in mapping and tracking efforts.

Description: The LCDC will explore and evaluate the use of hand-held GPS monitors during outfall and sewer observations and sampling to more accurately map the location of the conveyances, outfalls and illicit discharges.

Responsibility: LCDC

Measure: Documentation of evaluation and decision.

Schedule: Complete in 1st year

Task 4.2: Update drainage system map based on field observations and GIS aerial data.

Description: The LCDC will complete a field verification of the storm conveyance system and outfalls that are owned and/or operated by the LCDC based on the existing maps. This verification may be completed during the initial dry weather inspections, follow-up inspections, or as a separate field reconnaissance. The drainage system map and outfall table will be updated based on the field observations and GIS aerial data.

Responsibility: LCDC

Measure: Outfall map and table updated.

Schedule: Begin in 2nd year and complete in 4th year

Task 4.3: Develop and implement a procedure to identify and record outfalls from new construction.

Description: The LCDC will develop and implement a procedure to add any new outfalls that result from new construction. The procedure will involve identifying new outfalls and receiving waters through construction approval process, adding the outfalls to the existing drainage system map, and performing an initial dry

weather inspection of the outfall. New drainage systems are required to submit digital as-built data which will depict new outfall locations.

Responsibility:

LCDC

Measure:

Procedure documented and implemented. New outfalls mapped and inspected.

Schedule:

Complete in 3rd year

Section II - Plan Summary

The LCDC IDEP is summarized in the tables that follow. The first table lists the IDEP tasks by the associated General Permit (MIG619000) requirement (Part I, Section A.3.a) and it provides the implementation schedule and measure for each task.

Summary of IDEP tasks, implementation schedules and measures:

PERMIT REQUIREMENT	TASK #	TASK DESCRIPTION	SCHEDULE (Yr. After IDEP Submittal)	MEASURE
1. <i>Develop and implement a program to find and eliminate illicit discharges and illicit connections found during dry weather screenings.</i>	1.1	Review existing legal authority	Complete in 1 st	Written recommendations
	1.2	Develop needed legal authority	Complete in 4 th	Copies of modified authority
	1.3	Develop compliant system	Complete in 1 st	Documented use of system
	1.4	Review existing water quality data	Complete in 1 st	Written report and recommendations
3. <i>Develop a method for determining the effectiveness of the illicit discharge elimination activities which shall, at a minimum, result in the inspection of each storm water point source every five years unless an alternative schedule is approved by the MDEQ.</i>	1.5	Develop drain inspection schedule	Complete in 1 st	Written schedule
	1.6	Inspect outfalls at County owned offices	Begin and complete in 2 nd	Records of inspection and correction
	1.7	Investigate the coordination of inspections	Complete in 1 st	Meeting minutes, written recommendation
	1.8	Provide IDEP training to staff	Begin and complete in 1 st	Training records
	1.9	Inspect LCDC outfalls	Begin in 2 nd ; complete in 4 th	Records of findings
	1.10	Trace illicit discharges	Begin in 2 nd ; ongoing	Records of findings and eliminations
	1.11	Enforcement for non-correction	Begin in 2 nd ; ongoing	Records of actions; number of illicit found versus number eliminated
	1.12	Investigate ambient water quality monitoring	Begin and complete in 2 nd	Written recommendations
	1.13	Notify proper jurisdictions of illicit discharges or connections found by LCDC staff.	Begin in 1 st ; ongoing	Copies of referrals and reports

Summary of IDEP tasks, implementation schedules and measures (cont.):

PERMIT REQUIREMENT	TASK #	TASK DESCRIPTION	SCHEDULE (Yr. After IDEP Submittal)	MEASURE
2. <i>Develop and implement a program to minimize seepage from sanitary sewers and on-site sewage disposal systems (OSDS) into the applicant's separate storm water drainage system.</i>	2.1	Encourage use of LCHD OSDS complaint system	Begin in 1 st , ongoing	Documentation of efforts to encourage and of use
	2.2	Participate in effort to develop OSDS inspection program	Begin in 2 nd , complete in 4 th	Written recommendations on program
	2.3	Evaluate sanitary systems at LCDC and County owned facilities	Begin in 3 rd , complete in 4 th	Report of findings, corrections and/or recommendations
4. <i>Prepare an updated map of the location of each known storm water point source and the respective receiving water or drainage system.</i>	4.1	Evaluate the use of GPS in the inspections of outfalls and tracking illicit discharges	Complete in 1 st year	Documentation of decision
	4.2	Update drainage map based on field observations and GIS aerial data	Begin in 2 nd – complete in 4 th	Copy of updated map and table of outfalls
	4.3	Implement process to record new outfalls	Develop and implement in 3 rd	Documentation of implementation; map and table updated with new outfalls

IDEP tasks in chronologic order by year (after IDEP Submittal) in which the task will be initiated:

YEAR	TASK #	TASK DESCRIPTION	SCHEDULE
<i>1st year</i>	1.1	Review existing legal authority	Complete in 1 st year
	1.3	Develop storm water compliant reporting and response system (see Task 2.1)	Complete in 1 st year
	1.4	Review existing water quality data	Complete in 1 st year
	1.5	Develop LCDC drain/outfall inspection schedule	Complete in 1 st year
	1.7	Investigate coordination of IDEP inspections throughout the County	Complete in 1 st year
	1.8	Provide IDEP training to County staff	Complete in 1 st year
	1.13	Notify proper jurisdictions of illicit discharges or connections found by LCDC staff	Begin in 1 st ; ongoing
	2.1	Encourage use of LCHD OSDS complaint system (similar to Task 1.3)	Begin in 1 st ; ongoing
	4.1	Evaluate the use of GPS during inspections and tracking	Complete in 1 st year
<i>2nd year</i>	1.6	Inspect outfalls at LCDC and County owned facilities/offices	Complete in 2 nd year
	1.9	Inspect LCDC outfalls	Begin in 2 nd ; complete in 4 th
	1.10	Trace illicit discharges	Begin in 2 nd ; ongoing
	1.11	Enforcement for non-correction	Begin in 2 nd ; ongoing
	1.12	Investigate the feasibility and benefit on conducting base-line and follow-up ambient water quality monitoring	Complete in 2 nd year
	2.2	Participate in effort to develop OSDS inspection program in County	Begin in 2 nd ; complete in 4 th
	2.3	Evaluate sanitary systems at LCDC and County owned facilities	Begin in 3 rd ; complete in 4 th
	4.2	Update drainage map based on field observations and GIS aerial data	Begin in 2 nd ; complete in 4 th
<i>3rd year</i>	4.3	Develop and Implement a process to record new outfalls	Complete in 3 rd
<i>4th year</i>	1.2	Develop adequate legal authority if needed	Complete in 4 th year

Section III - Plan Evaluation and Update

The LCDC will evaluate the IDEP on a yearly basis to determine progress made towards meeting the objectives described above and to make changes in objectives as warranted. Based on the evaluation, the LCDC will prepare an annual summary report for the MDEQ of activities completed and proposed revisions.

Staff Contact: Brian Jonckheere

Title: Livingston County Drain Commissioner

Telephone: (517) 546-0040