

ILLICIT DISCHARGE ELIMINATION PLAN

FOR

THE VILLAGE OF ROMEO



PREPARED IN COMPLIANCE WITH

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT

PHASE II STORM WATER REGULATIONS

GENERAL STORM WATER PERMIT
MIG610000

and

CERTIFICATE OF COVERAGE
MI0060174

Revised March 2023

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Section I - Plan Objectives

Illicit Discharge Elimination Plan (IDEP) Objectives

This document describes the Village of Romeo's plan for identifying and eliminating illicit connections and discharges to the Waters of the State in its jurisdiction.

This plan has been developed to fulfill the requirements for Part I. Section A.4.3) of the State of Michigan's National Pollutant Discharge Elimination System (NPDES) General Permit (MIG610000) for Storm Water Discharges from Separate Storm Water Drainage Systems (MS4s) with Watershed Plans and the Certificate of Coverage, **MI0060174** that was issued to the Village of Romeo in November **2021** under the General Permit. The Village of Romeo is participating in the Clinton River East Subwatershed Group. The group is being facilitated by the Macomb County Public Works Office (MCPWO).

The Village of Romeo also has property within the North Branch Subwatershed and the IDEP will be implemented Village-wide.

The purpose of the IDEP is to develop a program to prohibit and effectively eliminate illicit discharges and connections to storm water conveyances within the Village of Romeo. The Federal Phase II storm water regulations define "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 water body 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.

For the purposes of this program "**outfall**" and "**point source**" are defined as a location where the storm water from a separate storm water conveyance under the jurisdiction of the Village of Romeo passes into a water body, wetland, upland or into a conveyance or property under the ownership or jurisdiction of an entity other than the Village of Romeo. "**Significant Illicit Discharge**" is a discharge that shows evidence of impairing water quality in the receiving water.

The Village of Romeo has MS4s under its jurisdiction and as such, the objectives of this IDEP are to:

1. Train appropriate Village of Romeo staff on the investigation of illicit connections and discharges, including those from on-site disposal systems (OSDS) with emphasis on outfall observations/screenings, safety issues and natural occurring phenomenon;
2. Implement a system for identifying and eliminating illicit discharges and connections to the MS4s including outfall observations and follow-up sampling;
3. The development of adequate legal authority to eliminate illicit discharges and connections to MS4s and provide for inspections of any MS4s that may be constructed in the Village of Romeo in the future;
4. Locate and accurately map the storm water conveyances and outfalls owned and operated by the Village of Romeo;
5. Work with the MCPWO and other agencies such as the Macomb County Health Department (MCHD) to promote the County-wide complaint response and referral system for storm water/water quality related complaints;
6. Work with the MCPWO and MCHD their efforts to develop and implement an OSDS inspection program;
7. Coordinate the Village of Romeo IDEP efforts with other local communities and impacted County agencies.

Section II - Community Background

A. General Information

The Village covers approximately 2.0 square miles in Macomb County. Originally established as an agricultural center, the Village was incorporated in 1838.

The center of its business district is at Main Street and St. Clair Street. The Village has a total population of 3,596 as determined in the 2010 census. The entire area of the Village falls within the “urbanized area” and the storm water regulations apply to all the public separate storm sewer systems within the Village limits.

The Village Clerk Administrator has been appointed as Storm Water Program Manager by the Village of Romeo and is responsible for implementation of the plan and compliance with the General Permit and COC. The Village Clerk Administrator can be contacted at (586) 752-3565.

B. Nested Jurisdictions

The Village of Romeo has not entered into a cooperative agreement with any nested jurisdictions within its jurisdictional area. Below is a list of all known nested jurisdictions within the Village of Romeo.

Nested Jurisdiction	Address	Status
Romeo School District Amanda Moore Elementary	209 Dickenson, Romeo	Unknown Status
Romeo School District Romeo Middle School	297 Prospect, Romeo	Unknown Status
Romeo School District Croswell Elementary	175 Croswell	Unknown Status
Romeo School District Administration Building	316 N. Main, Romeo	Unknown Status
MDOT	M-53 Bypass	Applying for their own permit
Macomb County Road Commission Storage Yard	Clinton St., Romeo	Applying for their own permit

C. Storm Water Drainage and Sanitary Waste Disposal

The majority of the land use in the Village is residential and industrial. Nearly 403 acres is single and multi-family residential and 428 acres is industrial. The Village does not have any known residences that are being served by on-site sewage disposal systems (OSDS).

The Village has separate sanitary and storm drainage systems under its jurisdiction. Figure 1 identifies the outfall locations and their receiving waters. This information will be verified as the IDEP is implemented. The Village currently knows of four outfalls under their jurisdiction. They ultimately discharge to the Healy Brook Drain and East Pond Creek.

Section III - Planned Efforts

The following subsections summarize the four required elements of an IDEP as specified in Part I, Section A.4.3) of the MDEQ Watershed Option General Storm Water Permit (MIG610000) and the Village's plans for addressing each element. The Village is committed to beginning the IDEP upon MDNRE approval or within 90 days of final submittal, and to completing activities to meet each of the required elements within four years of IDEP submittal. The actions completed will comply with the regulations and meet plan objectives. The planned actions are summarized and tabulated in Section IV of this plan. The Village's IDEP will be reviewed during preparation of the annual report to the MDNRE to determine if modifications are needed. The MDEQ will be advised of any changes in the plan.

The Village believes that public education and resident involvement is essential for protection and enhancement of our natural resources. For an IDEP to be effective there needs to be an ongoing Public Education Plan (PEP) that meets the objectives for the community. The Village plans to coordinate its IDEP with its PEP to develop target audiences and messages.

1. Develop an ordinance or other regulatory mechanism where an ordinance is not feasible or appropriate, to effectively prohibit illicit discharges into the MS4 owned or operated by the permittee, and to implement enforcement actions.

Task 1.1: Review existing legal authority to implement the IDEP.

Description: The Village must have adequate legal authority and enforcement capability to allow it to find, track and eliminate illicit connections. The Village conducted a thorough review of its existing legal authority to ensure it is adequate. No changes are needed at this time.

Responsibility: Village Clerk/Administrator, Consultant

Measure: Documentation of review and written recommendations.

Schedule: Completed; Ongoing

Task 1.2: Develop adequate legal authority (if necessary).

Description: If needed, based on the recommendations of Task 1.1, adequate legal authority will be developed to allow the Village to implement the IDEP within its jurisdiction. The Village conducted a thorough review of its existing ordinance, and amended it as necessary, to ensure that:

- the ordinance adequately defines illicit connections and discharges;
- the ordinance prohibits illicit connections and discharges;
- the Village has adequate legal authority to investigate suspected illicit connections and discharges;
- the Village has adequate legal authority to require elimination of illicit connections and discharges;
- the Village has adequate enforcement capability.

Responsibility: Village Clerk/Administrator, Consultant

Measure: Documentation of adoption of amendments.

Schedule: Ongoing; As-Needed

Task 1.3: Participate in a complaint receipt and response system.

Description: The Village encourages the use of the county-wide system to receive and track complaints regarding storm water, construction site and OSDS issues in the County. The system is operated by the Macomb County Public Works Office which includes a 24-hour toll free hotline that accepts water pollution complaints. The Village advertises the complaint system telephone number and e-mail address through

	various means such as newspapers, posters, websites, etc. Additionally, complaints received by the Village directly will be addressed in a timely manner.
Responsibility:	Village Clerk/Administrator, MCHD
Measure:	Documentation of development and use of the system; Outcome of complaints; Results reviewed and pollutants identified.
Schedule:	Ongoing throughout the permit cycle
Task 1.4:	Develop a schedule for the inspection of all Village drains and outfalls.
Description:	The Village uses existing water quality data, knowledge of problem areas, existing work/inspection schedules, location of urbanized area and other criteria to inspect Village drains and outfalls. The schedule will allow the inspection of all of the outfalls (15 total), including the outfalls where water quality problems exist (Impaired Uses, TMDLs, etc.) within 5 years of COC issuance. Dry weather screening was performed at all outfalls within the Village in 2023 and is schedule to be completed in again in 2028, and every 5 years after that. The Village also provided input on the MCPWO IDEP and TMDL Collaborative Plan implemented in September 2010.
Responsibility:	Village DPW Supervisor, Consultant
Measure:	A written inspection schedule
Schedule:	Every 5 years
Task 1.5:	Perform visual inspections and dry weather screenings of Village and/or operated storm water conveyance outfalls.
Description:	Based on the schedule developed in Task 1.4, dry weather visual inspections will be conducted at each of the Village's known outfalls shown in Figure 1. In instances where the outfall is submerged, directed to another enclosed sewer, or is otherwise inaccessible, the Village will visually inspect the structure (catch basin or manhole) directly upstream from the outfall. 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 a possible illicit discharge. During this investigation, the Village will perform a visual inspection of the drains located within the Village limits and document any previously unrecorded or unknown outfalls and determine ownership as appropriate.
Responsibility:	Village DPW Supervisor, Consultant
Measure:	Documentation of findings and observations; Number of possible illicit connections traced; Notification of elimination; Eliminate illicits within 90 days of notification.
Schedule:	Every 5 years
Task 1.6:	Trace Illicit Connections and Owner Notification
Description:	Trace suspected illicit connections found in Task 1.5 to their source using the techniques described below, and notify the owner or responsible jurisdiction of the problem in writing. If the illicit connection or discharge is a direct discharge to a Village-owned conveyance, then the Village 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 discharge is to another jurisdiction's storm water conveyance and reaches a Village connected conveyance indirectly, then the Village will require the owner of the system to provide updates on their investigation and inform the Village when the connection has been eliminated. After notification, the Village will perform a follow-up inspection or confirm the correction in some other manner. The timeframe for eliminating the connection/discharge will depend on the type and significance of the illicit connection/discharge, and the expense and

difficulty of repair. Those that cause a significant discharge will have priority. The goal of the plan is to have most illicit connections/discharges eliminated within 90 days of notification. For non-complex illicit connections/discharges may take no longer than 14 days to be eliminated. More complex illicit connections/discharges may take longer than 90 days to eliminate.

Tracing techniques - All storm outfalls that are discharging during dry weather will be investigated further and within 1-2 business days of discovery. The Village may be able to locate the source of an illicit connection/discharge solely through visual observation. Odor, color, turbidity, bacteria growth, quantity of flow, etc., may lead to the source of a problem 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 and notify the owner or responsible jurisdiction of problem in writing within 30 days of discovery. The Village will direct the owner of the source to eliminate the illicit connection/discharge within 14 days for non-complex issues and up to 90 days for more complex issues.

1. 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 Village will sample the flow for pollutant parameters typically found in illicit connections within 1-2 business days of discovery. Sampling can rule out some dry weather discharges such as groundwater. For non-complex illicit connections/discharges may take no longer than 14 days to be eliminated. More complex illicit connections/discharges may take longer than 90 days to eliminate. 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, or raw sewage.
 - The presence of foam, oil sheen, floatables, and trash

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

2. As-built plan review - Where available, the Village 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 Village 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. Should dye testing become necessary, the Village will obtain MDNRE approval to use tracer dyes. Prior to conducting the testing, the Village will notify the DEQ of the time, place and expected discharge area. The Village will resubmit for approval of the use of tracer dyes on a yearly basis as needed. All facility inspections will be documented.
4. Televising - The Village 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 Village of Romeo 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.
5. The Village will conduct wet weather observations of 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: Village DPW Supervisor, Consultant
Measure: Documentation of findings and observations; Number of possible illicit connections traced; Notification of elimination; Eliminate illicit within 90 days of notification.
Schedule: Ongoing; As-Needed

Task 1.7: Notify proper jurisdictions of illicit discharges or connections found by Village staff.

Description: During the course of normal business, staff of the Village may observe illicit connections or discharges that are not under the Village's jurisdiction. The Village will notify the owner or agency with jurisdiction of the problem in writing. The Village of Romeo will report any identified significant illicit discharges including those of untreated or partially treated sewage to the MDNRE within 24 hours after the discharge begins or is discovered and of corrective actions being taken to eliminate the connection/discharge. For non-complex illicit connections/discharges may take no longer than 14 days to be eliminated. More complex illicit connections/discharges may take longer than 90 days to eliminate. The reports will

cover the information required by the General Permit and Certificate of Coverage. If the discharge is of sewage, the Village 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.

The Village will submit a biennial progress report to MDNRE summarizing the activities completed including illicit connections and discharges Village of Romeo identified and corrected. For significant illicit discharges, the Village of Romeo 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, the report will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended.

Responsibility: Village Clerk/Administrator, Consultant

Measure: Documentation of the notification; Updates in Progress Reports; Eliminate illicit within 90 days of notification.

Schedule: Biennially; Ongoing As-Needed

Task 1.8: Follow-up Enforcement for Non-correction

Description: The Village will follow up with the owner of the source of an illicit discharge that is going directly to a Village owned drain to ensure that the connection/discharge has been eliminated. If the illicit discharge has not been eliminated, the Village will use its legal authority to obtain compliance. If the illicit discharge is an indirect source, the Village will coordinate follow-up and enforcement with the jurisdiction in which the discharge originates. For non-complex illicit connections/discharges may take no longer than 14 days to be eliminated. More complex illicit connections/discharges may take longer than 90 days to eliminate.

Responsibility: Village Clerk Administrator

Measure: Documentation of enforcement actions; Number of illicit connections/discharges found vs. number eliminated; Updates in Progress Reports; Eliminate illicit within 90 days of notification.

Schedule: Ongoing; As-Needed

Task 1.9: Coordination with the MDEQ

Description: The Village reports any identified significant illicit discharges including those of untreated or partially treated sewage and of corrective actions being taken to eliminate the connection/discharge in the annual report. In most cases, the Village of Romeo coordinates the repairs needed to eliminate illicit connections directly.

The Village will submit a biennial report to MDEQ summarizing the activities completed including illicit connections and discharges Village of Romeo identified and corrected. For significant illicit discharges, the Village of Romeo 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, the report will follow the reporting requirements of Section 324.112a of Part 31 of Public Act 451 of 1994, as amended.

Responsibility: Village Clerk Administrator/Consultant

Measure: Documentation of program updates; Number of illicit connections, discharges, etc.

Schedule: Annually or Biennially

2. Develop a program to find and eliminate illicit connections and discharges to the MS4 from commercial, industrial, private educational, public, and residential resources.

Task 2.1 **Identify and report failed OSDS within the Village of Romeo.**
Description: Currently, the Village does not have any known OSDS within Village limits. Should the Village find failing OSDS during the course of normal Village activities, or receive a complaint, the Village will contact the MCHD and coordinate and investigation as appropriate.
Responsibility: Village DPW Supervisor
Measure: Complaint and referral records.
Schedule: Ongoing throughout the Permit Cycle

Task 2.2: **Evaluate the integrity of the Village sanitary systems.**
Description: The Village evaluates the sanitary systems and sewers at Village-owned and operated facilities to insure that seepage into the groundwater and surface water are minimized. The evaluation may include visual inspection, flow record review, sewer televising and other means as appropriate.
Responsibility: Village DPW Supervisor
Measure: Report of findings, corrections and/or recommendations
Schedule: Ongoing; As-Needed

Task 2.3: **Develop and implement a procedure to identify and record, map and inspect outfalls from new construction.**
Description: The Village has 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. The Village updated its outfall map in May 2008. A copy of the map is attached. The map will be updated as new outfalls are discovered, constructed, or eliminated.
Responsibility: Village DPW Supervisor, Consultant
Measure: Procedure documented and implemented; New outfalls mapped and inspected as needed.
Schedule: Ongoing; As-Needed

3. *Develop a program to train staff employed by the permittee who are involved in illicit discharge-related activities, or who have field jobs with the potential for witnessing illicit discharges and connections.*

Task 3.1: **Provide training to appropriate Village of Romeo staff on illicit connections and discharges, failed OSDS, safety issues and natural occurring phenomenon. Determine the feasibility of coordinating this training with the other agencies and the local communities in the County.**
Description: The Village currently provides training on illicit connections and discharges, failed OSDS safety issues and natural occurring phenomenon to appropriate Village staff. Training will be held for all relevant staff at least every 3 years.
Responsibility: Village DPW Supervisor, Consultant
Measure: Training records and certificates.
Schedule: Every 3 years

4. *Develop a method for determining the effectiveness of the illicit discharge elimination activities that 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 4.1: **The Village will establish a tracking system to monitor progress of implementing the IDEP.**

Description: Biennially, as established in the COC, the Village will prepare and submit a report summarizing its illicit discharge elimination efforts to MDEQ. The report will summarize the following: *(the report is required by the MDEQ NPDES Permit)*

- illicit connections/discharges identified through citizen complaints, referrals from county or state agencies, inspections, sampling and/or sewer television and the corrective actions taken, including follow up inspections and sampling;
- results of inspections and sampling (including pollutant, estimated volume and load and location for significant illicit discharges);
- dry/wet weather storm water outfall inspections conducted;
- schedules for the elimination of unresolved problems/discharges;

Optional reporting items:

- storm sewers televised in the past year as well as the findings;
- corrective actions taken as a result of storm sewer televising;
- the anticipated schedule for televising storm sewers in the upcoming year;
- sanitary sewers televised in the past year as well as the findings;
- corrective actions taken as a result of sanitary sewer televising;
- the anticipated schedule for televising the sanitary sewers in the upcoming year.

Responsibility: Village Clerk/Administrator, Consultant

Measure: Update tracking system as needed; Updates in Progress Reports.

Schedule: Biennially; Ongoing throughout the Permit Cycle

Task 4.2: **Develop a procedure to identify the overall effectiveness of the IDEP.**

Description: The Village will work with its consultant and Clinton River East Subwatershed Advisory Group to identify the best way(s) at measuring effectiveness.

Responsibility: Village Clerk/Administrator, Consultant

Measure: Documentation of evaluation and decisions made.

Schedule: Ongoing throughout the Permit Cycle

Section IV - Summary of Planned Efforts

The Village's IDEP is summarized in the tables that follow. The first table lists the IDEP tasks by the associated General Permit (MIG610000) requirement (Part I, Section A.4.3)) 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	MEASURE
1. <i>Develop an ordinance or other regulatory mechanism where an ordinance is not feasible or appropriate, to effectively prohibit illicit discharges into the MS4 owned or operated by the permittee, and to implement enforcement actions.</i>	1.1	Review of existing legal authority	Completed; Ongoing	Review documentation with recommendations
	1.2	Develop legal authority	Completed; Ongoing	Documentation of the adopted amendments
	1.3	Develop a complaint/response system	Ongoing throughout the permit cycle	Documentation of development and use of system; outcome of complaints
	1.4	Develop schedule of inspections	Every 5 years	Written inspection schedule
	1.5	Perform visual inspections	Every 5 years	Documentation of findings and observations; no. of possible illicit traced
	1.6	Trace illicit connections, discharges	Ongoing; As-Needed	Documentation of findings and observations; no. of possible illicit traced
	1.7	Notify proper jurisdictions of illicit discharges or connections	Biennially; As-Needed	Documentation of notification; updates in progress reports
	1.8	Follow-up enforcement for non-correction	Ongoing; As-Needed	Documentation of enforcement; updates in progress reports
	1.9	Coordination with MDNRE	Annually or Biennially	Documentation of program updates; no. of illicit

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

PERMIT REQUIREMENT	TASK #	TASK DESCRIPTION	SCHEDULE	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	Identify and report failing OSDS	Ongoing throughout the permit cycle	Complaint and referral records
	2.2	Evaluate sanitary systems	Ongoing; As-Needed	Report of findings, corrections and/or recommendations
	2.3	Develop procedure to identify and record new outfalls	Ongoing; As-Needed	Documentation of procedure and implementation
3. <i>Develop a program to train staff employed by the permittee who are involved in illicit discharge-related activities, or who have field jobs with the potential for witnessing illicit discharges and connections.</i>	3.1	Provide training to Village staff on IDEP and OSDS issues	Every 3 years	Training records and certifications
4. <i>Develop a method for determining the effectiveness of the illicit discharge elimination activities that 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 MDNRE.</i>	4.1	Establish tracking system to monitor progress of IDEP implementation	Biennially; Ongoing throughout the permit cycle	Update tracking system as needed; updates in progress reports
	4.2	Develop a procedure to identify the overall effectiveness of the IDEP.	Ongoing	Documentation of evaluation and decisions made