

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination

Best Management Practices 3.2.3	Illicit Discharge Detection and Elimination Program (This is a summary of the entire illicit discharge detection & elimination program) The City of Oberlin will implement an illicit discharge detection and elimination program designed to preclude the discharge of pollutants to the watershed.
Permit Requirement Permit Section 3.2.3.1.1	Develop, implement and enforce a program to detect and eliminate illicit discharges, as defined Part 7 of this permit, into your small MS4 (for illicit discharges to your MS4 via a neighboring interconnected MS4, you are only required to inform the neighboring MS4 and Ohio EPA in your annual report submission, of their existence);
Goal of BMPs:	<p>Provide a description of the goal of the BMPs used to meet this requirement.</p> <p>The goal of the Best Management Practices associated with the Illicit Discharge Detection & Elimination Program (IDDEP) is to eliminate pollution caused by materials being poured, spilled, dumped, washed, or otherwise discharged into the municipal storm drain system and/or the water courses.</p> <p>In accordance with Section 1.2.2.2 of this permit, the City anticipates an allowance for the discharge of some minor types of non-storm water discharges.</p>
Program Description: Provide a description of the BMPs that will be used to meet this requirement. Use additional pages or attachments as necessary.	
3.2.3.1.1	The component activities of the IDDEP are expected to include:
3.2.3.1.2	The City of Oberlin is in the process of upgrading its comprehensive storm sewer system map. The upgraded map will be on a GIS Database and will include HSTS locations with discharges tributary to the Oberlin MS4, as they may exist.
3.2.3.1.3	Development of an ordinance authorizing the IDDEP. The objectives of the proposed ordinance will include regulation of the contribution of pollutants to the MS4 from storm water discharges by any user, the regulation of non-storm water discharges, prohibition of Illicit Connections and Discharges (ICDs) and the establishment of legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance with the ordinance.
3.2.3.1.4	The City of Oberlin will proactively identify and eliminate illicit discharges to its MS4 through field surveys of the municipal storm drainage conveyance system followed by the identification and elimination of source(s).
3.2.3.1.5	The City of Oberlin will inform the general public, its businesses and institutions and its employees in accordance with the Public Education & Outreach, Section 3.2.1 , the Public Involvement/Participation, Section 3.2.2 , and the Pollution Prevention/Good Housekeeping for Municipal Operations, Section 3.2.6 of this plan.
3.2.3.1.6	It is anticipated that the permitted non-storm water discharges or flows listed at 1.2.2.2 of this permit do not constitute significant contributors of pollutants in our MS4. The City will monitor these sources of discharge in accordance with Section 3.2.3.1.4 above.
3.2.3.1.7	The City will monitor these alternate sources of discharge in accordance with Section 3.2.3.1.4 above.

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination

Implementation Schedule:	
<u>Year by year description of program.</u>	
2003	<p>Establish the GIS Database for the transition and inclusion of its schematic storm sewer system map (a CAD drawing layout of the system) into its GIS System. Field observations will be recorded using GPS equipment to locate the horizontal position of the various components including outfalls and culverts. Where appropriate, photographs will be taken of a component and included in its attributes. The City of Oberlin expects to complete mapping as described above for its various outfalls and culverts in 2003.</p> <p>Assemble supporting documentation for first draft of an illicit discharge ordinance.</p> <p>Prepare its Action Plan for effective investigation, tracking, and elimination of illicit discharges. This Plan will be designed to progress through the Oberlin MS4 concurrent with the mapping program described above.</p>
2004	<p>The City of Oberlin will continue to upgrade its storm sewer system map. The methodology will be as discussed above for 2003 with the flexibility to adjust as may be necessary. The City intends to complete the upgrade of one-third of its storm sewer system map in 2004.</p> <p>Prepare final draft of illicit discharge ordinance. Stakeholder, General Public and City Council review.</p> <p>Implement the Action Plan as follows:</p> <ul style="list-style-type: none"> • Perform the annual survey of high priority areas. • Document the survey and related activities. • Make referrals to outside agency as appropriate within the Action Plan. • Annual review and update of the Action Plan. Include evaluation of field survey results for the year and determination of the most prevalent types of non-storm water discharges. • Train illicit discharge inspectors with the objective of developing the knowledge and skills necessary to conduct effective field investigations.
2005	<p>The City of Oberlin will continue to upgrade its storm sewer system map. The methodology will be as discussed above for 2003 with the flexibility to adjust as may be necessary. The City intends to complete the upgrade of the second one-third of its storm sewer system map in 2005.</p> <p>Establish administrative program for implementation and enforcement of actions authorized by the illicit discharge ordinance.</p> <p>Implement the Action Plan as follows:</p> <ul style="list-style-type: none"> • Perform and document the annual survey of high priority areas. • Survey of second and/or third priority areas to ensure that the entire drainage area within the City's jurisdiction is inspected at least once during the period of the Action Plan. • Make referrals to outside agency as appropriate within the Action Plan. • Annual review and update of the Action Plan. Include evaluation of field survey results for the year including types of non-storm water discharges. • Train illicit discharge inspectors with the objective of developing the knowledge and skills necessary to conduct effective field investigations.

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination

2006	<p>The City of Oberlin will continue to upgrade its storm sewer system map. The methodology will be as discussed above for 2003 with the flexibility to adjust as may be necessary. The City intends to complete the upgrade of the final one-third of its storm sewer system map in 2006.</p> <p>Adopt and enforce illicit discharge ordinance.</p> <p>Implement the Action Plan as follows:</p> <ul style="list-style-type: none"> • Perform and document the annual survey of high priority areas. • Survey of second and/or third priority areas to ensure that the entire drainage area within the City's jurisdiction is inspected at least once during the period of the Action Plan. • Make referrals to outside agency as appropriate within the Action Plan. • Annual review and update of the Action Plan to include evaluation of field survey results and the most prevalent types of non-storm water discharges. • Train illicit discharge inspectors with the objective of developing the knowledge and skills necessary to conduct effective field investigations.
2007	<p>The City of Oberlin expects to include in its GIS map, the location of all HSTSs tributary to its storm drainage system that are located within the jurisdiction (city limits) of the City of Oberlin. The mapped HSTSs will be based on HSTS data expected to be provided by the Lorain County Health Department during the period 2003-06.</p> <p>Continued enforcement of illicit discharge ordinance.</p> <p>Implement the Action Plan as follows:</p> <ul style="list-style-type: none"> • Perform and document the annual survey of high priority areas. • Survey of second and/or third priority areas to ensure that the entire drainage area within the City's jurisdiction is inspected at least once during the period of the Action Plan. • Make referrals to outside agency as appropriate within the Action Plan. • Annual review and update of the Action Plan to include evaluation of field survey results and the most prevalent types of non-storm water discharges. • Train illicit discharge inspectors with the objective of developing the knowledge and skills necessary to conduct effective field investigations. <p>Annual review and update of the Action Plan, including the establishment of a Five Year - Action Plan to coincide with the NPDES Permit Period (based on five year permit cycle).</p> <p>Note: Section 3.2.3.1.2.1 of the Final Permit states that the communities have a five-year schedule for the completion of the storm sewer system map and address list of all on-site sewage disposal systems (Section 3.2.3.1.2.1.1).</p>

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination

Measurable Goals: (Section 3.2.3.2.7)	
Provide a description of the measurable goals of each BMP used to meet this requirement, or if applicable, refer to the individual BMP sections for details on the measurable goals.	
3.2.3.1.2	The City of Oberlin will develop and maintain a GIS-based map of its MS4. This map will serve as a reliable reference tool when researching and recording MS4 issues.
3.2.3.1.3	Development and adoption of legislation authorizing the IDDEP which will establish the legal authority for inspection, surveillance, monitoring and procedures necessary to ensure compliance.
3.2.3.1.4	The City will document the status of all ICDs and HSTSs in the MS4.
Decision Process:	You must document your decision process for the development of a storm water illicit discharge detection and elimination program. Your rationale statement must address both your overall illicit discharge detection and elimination program and the individual BMPs, measurable goals, and responsible persons for your program. The rational statement must include the following information, at a minimum:
Permit Section 3.2.3.2	
In order to develop the Illicit Discharge Detection & Elimination component of its SWMP, the City of Oberlin has reviewed current practices, participated in regional planning processes with the Northeast Ohio Areawide Coordination Agency and the Lorain County Community Development Department, performed various literature searches and reviewed the requirements of the permitting process. This has resulted in the selection of the BMPs for the following reasons:	
3.2.3.2.1	The City of Oberlin will map its MS4 based on existing historical records and those obtained through the Lorain County Auditor’s office. The existing schematic storm sewer system map (a CAD drawing) will be adapted to the GIS database. Field observations will be recorded using GPS equipment to locate the horizontal position of the various components including outfalls and culverts. Where appropriate, photographs will be taken of a component and included in its attributes. An attributes schedule will be developed for each component of the storm sewer system (pipe, manholes, inlets, retention basins, outfalls, ditches, culverts, etc.). The GIS attributes schedule will be calibrated by actual observation of a representative sample of the storm sewer system components. The purpose of these efforts will be to record and adjust the present map position of each component to its actual field position with all respective, known attributes attached. This map will be regularly updated as changes are made to the MS4.
3.2.3.2.2	In order to develop the Illicit Discharge ordinance, the City of Oberlin will assemble model ordinances from other communities and related supporting documentation. A draft ordinance will be prepared for review by the general public, stakeholders, City administrators and City Council. A final draft ordinance will be prepared and an administrative plan for its implementation/enforcement will be developed. It is anticipated that an ordinance will be adopted and implemented in 2006.
3.2.3.2.3	The Illicit Discharge ordinance will be developed and implemented according to the schedule outlined above. It will be enforced in conjunction with the development of the GIS map and the field surveys.
3.2.3.2.4	The City of Oberlin will develop an Action Plan to proactively identify and eliminate illicit discharges to its MS4 through field surveys of the municipal storm drainage conveyance system. The Action Plan includes reliance on accurate maps of the City’s storm drain system. The Plan will include:

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination

- A protocol for determination of first, second and third priority areas.
- A procedure for conducting dry weather field surveys.
- Procedures for tracing illicit discharges. These will rely heavily on the Map to determine direction of flow. It is anticipated that field crews will follow illicit discharges upstream to their source using a combination of sewer cameras and/or field inspections as required.
- ICDs will be removed from the MS4 as provided in the Illicit Discharge ordinance.
- Annual review and update as necessary the Action Plan. The review will include an evaluation of field survey results from the previous year and an assessment of which types of non-storm water discharges were most prevalent.
- Training of illicit discharge inspector(s). Training to be designed to provide inspectors with the knowledge and skills necessary to conduct effective field investigations.

Supporting Information:

Provide any supporting documentation necessary – such as training manuals, program standards, contracts with service providers or examples of available information/public education brochures

Reporting Mechanism:

Provide a description of the documentation anticipated to be included in the permit-required Annual Report. Examples of documentation may include description of work performed, storm sewer maps, investigation reports, measurable goals data and any recommended revisions to the SWMP.

In order to document the activities of the BMPs related to its **Illicit Discharge Detection & Elimination Program**, the City of Oberlin will submit with its annual report:

- 3.2.3.1.2 The most recent version of the City's map of its MS4.
- 3.2.3.1.3 Drafts, supporting documentation and the final ordinance as approved of its Illicit Discharge ordinance.
- 3.2.3.1.4 Its protocols for prioritization, field surveys, tracing and elimination of illicit discharges to the MS4. The City will submit evidence of staff training as necessary and appropriate.

Best Management Practices	Illicit Discharge Detection and Elimination Program		
Responsible Party – Contact Information: (Section 3.2.3.2.6)			
Contact Name:	Jeff Baumann		
Department:	Public Works Department		
Address:	City of Oberlin 85 South Main St. Oberlin, OH 44074		
Phone:	(440) 775-7204	Fax:	(440) 775-7208
Email:	jbaumann@cityofoberlin.com		
Signature:			

City of Oberlin
Storm Water Management Program
Illicit Discharge Detection & Elimination