

Summary Table of Model Plan Recommendations for the Illicit Discharge Detection and Elimination Minimum Control Measure

Ohio EPA Requirement	NOACA Model Plan Recommendation	Recommended Measurable Goals/Timeframe	Notes/Linkages/Proposed Regional Support Strategy	Departure from the Status Quo Recommended by the NOACA Model Plan
Develop, implement and enforce a program to detect and eliminate illicit discharges. (Section 4.2.3.1.1) [It is anticipated that this requirement will not be listed as a specific requirement when Ohio EPA issues its final Permit in December 2002.]	Develop an illicit discharge detection and elimination program that includes the following required components.	Program development by March 10, 2003	This is the overall minimum control measure requirement that includes all of the following requirements.	See comments below.
		Revisions – Annually or as needed.		
Develop a storm sewer system map, showing the location of all outfalls and HSTs connected to the MS4 and the surface waters that receive discharges from those outfalls. (Section 4.2.3.1.2) (Section 4.2.3.1.2.1.2)	Identify if storm sewer system map exists.	Map, if one exists, to be submitted prior to March 10, 2003.	It is recommended that the community utilize available county orthophotos as base maps.	The Task Force recommends a program that meets the minimum program required by Ohio EPA and provides the opportunity for communities to collect more detailed information. The recommended program provides for the generation of standardized computer maps that can be combined with other communities. The Northeast Ohio Regional Sewer District will provide the data that they have available to all communities that lie within their service area. Other communities will have to provide for the mapping on their own. The Regional Sewer District will also provide a standardized data base to all communities to facilitate data management and sharing.
	Identify available map data.	Map data listing prior to March 10, 2003.		
	Develop data collection plan.	Collection plan developed, if possible, prior to March 10, 2003. If not, during first half of 2003.		
	Initiate collection of the necessary data.	If possible, by second half of 2003.		
	Develop map showing outfalls, HSTs and if available, storm drainage system.	Storm system map developed by December 2004.	Update storm sewer system map periodically as changes to the MS4 occurs.	
Submit list of all on-site sewage disposal systems (HSTs) connected to your MS4. (Section 4.2.3.1.2.1.1)	Develop and submit the list of on-site HSTs as required.	Draft permit requires that this map be completed within 3 years of permit issuance.	Coordinate this effort with the County Board of Health, or other local health authority.	The recommended program provides for the generation of standardized computer maps that can be combined with other communities
Prohibit, through ordinance, illicit discharges into MS4 and implement appropriate enforcement procedures. (Section 4.2.3.1.3)	Identify if required ordinance already exists.	Prior to March 10, 2003.	Example ordinance may be provided as part of the Illicit Discharge Model Plan Recommendations Document.	This recommendation augments existing efforts to limit illicit connections to the community's storm water system by providing model ordinance and guidance. Communities will experience an increased reporting burden
	If necessary, adopt an ordinance to prohibit illicit discharges to the MS4 and provide enforcement procedures.	Updated or newly created ordinance prohibiting illicit connections by December 2003.		

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Develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to your system. (Section 4.2.3.1.4)	<p>Communities should develop an investigation program to perform initial and follow-up investigations.</p> <p>Routine follow-up investigations should be scheduled on an annual basis and arrangements should be made to perform complaint-generated inspections.</p> <p>Initiate a program to provide for problem tracing follow-up investigations to respond to prioritized dry-weather discharges or complaint-based investigations.</p>	<p>Initial visual inspection of all community outfalls should be accomplished by December 2003 if feasible or as soon after is possible. Annual summary report of on-going inspections.</p> <p>Develop program by December 2003.</p> <p>Annual summary report of on-going investigations.</p>	The Task Force provides prioritization guidance. Dry-weather sampling recommendations include regular bacterial monitoring and sampling for additional parameters on an as-needed basis.	<p>Communities must commit to a regular and comprehensive inspection program in order to detect and eliminate illicit discharges to their storm sewer system.</p> <p>Monitoring requirements are restricted to investigation of illicit discharges with unknown sources. Bacterial sampling is expected to be the most commonly monitored parameter.</p>
Inform public of hazards associated with illegal discharges. (Section 4.2.3.1.5)	Identify messages and methods of informing public.	Educational activities should be performed annually.		All communities are encouraged to coordinate this activity with the PIPE Committee established as part of their overall storm water management program.
	Perform public education program.	Annual report describing educational focus taken and identifying future messages.		
Address the non-storm water discharges identified as significant pollutant contributors to the MS4. (Section 4.2.3.1.6)	Identify if there are any non storm-water discharges that need to be addressed.	Prior to March 10, 2003.		This is an on-going educational commitment
	If so, develop a plan to address these non storm-water discharges.	As necessary, throughout permit cycle.		
Develop a list of other non-storm water discharges that will not be addressed as illicit discharges. (Section 4.2.3.1.7)	Begin assessment of non-storm water discharges in community.	Prior to March 10, 2003.		This is an on-going educational commitment
	Develop list of non-storm water discharges that will not be addressed.	Revise list annually or as needed.		