

# **Illicit Discharge Detection and Elimination Plan**

For

4GQ00043\*AG 2023 Storm Water Management Plan- Village of Lithopolis,  
Fairfield and Franklin County, OH

*(Note: The Village of Lithopolis crosses into Franklin County. Should issues be identified in the sparsely populated area by Village Staff they would report to Franklin Department of Health and follow the same protocols as outlined in this plan)*

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## **SECTION 1.0 Introduction**

This document outlines the process that Fairfield County, Violet Township, Liberty Township and the Village of Lithopolis are taking to address public health concerns and water quality issues related to illicit discharges the EPA MS4 permitted areas. **Effluent from illicitly connected or malfunctioning Household Sewage Treatment Systems (HSTS) is considered the primary pollutant of concern within the permitted areas.**

A substantial investment in time, money, and energy is responsible for the progress made to date with defining and documenting the issue surrounding HSTS. These efforts have involved indentifying the locations of HSTS throughout the EPA MS4 permitted areas, Field Verification and Dry Weather Screening (DWS) of Municipal Separate Storm Sewer (MS4) outfalls, mapping of the stormwater sewer system, establishing ordinances and zoning requirements, and planning for community education, outreach and the means for addressing illicit discharges.

The National Pollution Discharge Elimination System (NPDES) Small MS4 Stormwater General Permit (OHQ000002) defines regulated MS4s as MS4s which are owned and operated by the permittee and located within the Urbanized Areas as defined by the 2010 census. It is the obligation of the OEPA MS4 permit holders to address illicit discharges in the area. Many of the entities contributing to meeting the requirements of the permit are responsible for the whole of their jurisdiction, not only the areas designated as MS4 areas.

Within the OEPA MS4 permitted areas, the use of HSTS is prevalent and widespread. The identification, permitting and regulation of illicitly connected, discharging and malfunctioning HSTS is very costly to address both financially and in terms of human resources. However, in keeping with the published guidelines for the NPDES Small MS4 Stormwater General Permit, the EPA MS4 Permit holders and partners are undertaking the task of addressing illicit discharges to the maximum extent practical and as is legally, feasibly and economically viable.

## **SECTION 2.0 Policy Statements and Guiding Principles**

Fairfield County Health Department (FCHD) and the Fairfield County Commissioners (FCC) through the Fairfield County Utilities (FCU) and their copermittee Violet Township (VT) along with the separately permitted Liberty Township (LT) and the Village of Lithopolis (VL) along with the Fairfield Soil and Water Conservation District (FSWCD) and Fairfield County Engineer (FCE) by agreements and the Ohio Revised Code (ORC), are responsible for the implementation of the EPA MS4 permits within their jurisdictions and appropriate policy statements. These policy statements and guiding principles are outlined as follows:

1. Empower the public by distributing educational materials and information about the impacts of stormwater discharges on water bodies and steps they can take to reduce pollutants in stormwater runoff. Inform public employees, businesses, and the general public of the hazards associated with illegal discharges, improper disposal of waste and the improper operation and maintenance of HSTS.
2. The OEPA requires that permittees identify on-site sewage disposal systems connected to discharge to their regulated MS4. FCHD has identified these systems within the MS4 areas

and is conducting an operation and maintenance program to identify and correct systems causing a public health nuisance as defined by OAC 3701-29 and ORC 3718.

3. As required by Ohio law and the Ohio EPA, FCHD will enforce the public health nuisance statute as defined in ORC Chapter 3718.
4. It is recommended that citizens monitor their access and exposure to ditches and streams that may be contaminated with bacteria from discharging HSTS, and that those living in homes with drinking water supplied by private wells test their well water frequently if there is any concern that contamination may be occurring from any source, including soil absorption HSTS.
  - a. Bacterial contamination standards for streams and ditches are set by the OEPA and are applied to exposures (ingestion of surface water) from recreational use of that stream and other waterways such as canoeing, fishing, wading, and swimming.
5. Officials will continue to work with surrounding communities to identify pollution sources from these jurisdictions entering their MS4s, opportunities for sewer extensions, and alternatives for treating household sewage. Officials will also continue to look for funding opportunities to finance sewer extensions as well as address economic hardship situations for low-income residents to connect to sanitary sewer or to upgrade or replace their HSTS.
6. FCHD along with VL and the FCU will develop long-range strategies to minimize illicit discharges and promote proper operation/maintenance of HSTS countywide. Officials realize that any long-range plan needs to be flexible and reviewed annually to adapt to changes in the regulatory environment, the availability of funding mechanisms, and other unforeseen social, political, or economic conditions.
7. FCHD maintains an operation/maintenance program for all aeration treatment systems that discharge to MS4s, watercourses, field tiles or other sources within the permitted area. This program includes permitting, annual observations of the discharging system, and enforcement of aeration treatment systems that create illicit discharge and/or public health nuisances.
8. FCHD is evaluating the development of a countywide operation/maintenance program for all HSTS. This program may require HSTS owners of soil absorption and discharging systems to have an operation permit. The permit period and frequency of inspections is to be determined.
9. FCHD has been granted authority by OEPA to conduct inspections of semi-public treatment systems in Fairfield County. FCHD also has authority under ORC 3718 to inspect small-flow treatment systems. Some of these treatment systems are discharging systems. These systems are to be inspected on an annual basis and enforcement of public health nuisances caused by these systems are the responsibility of FCHD. Planning and collaboration with OEPA will be conducted when needed.

### **SECTION 3.0 General Permit Information**

This document was produced to communicate steps being taken to improve water quality and meet the requirements of NPDES Small MS4 Stormwater General Permit stormwater discharges of Fairfield County/Violet Township, Liberty Township Sections 6 and 30R and the Village of Lithopolis. This document is subject to periodic updates as progress is made with the various requirements of the permit and as OEPA clarifies or modifies the language of the permit.

*“As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES) permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. Point sources are discrete conveyances such as pipes or man-made ditches...Since its introduction in 1972, the NPDES permit program is responsible for significant improvements to our Nation’s water quality”*

All OEPA permitted jurisdictions work cooperatively to meet the requirements of NPDES Small MS4 Stormwater General Permits. The City of Pickerington and the City of Canal Winchester are currently both under the Franklin County Public Health oversight and hold separate IDDE policies but work cooperatively with the adjacent permitted jurisdictions. Through this cooperation all jurisdictions intend to meet the requirements of the permit utilizing a more comprehensive approach and a more efficient use of resources. The Fairfield County Utilities is the primary contact for all concerns related to the NPDES Permit for The County and Violet Township, the Liberty Township Trustees for their permitted area and the Village of Lithopolis for their permitted area in Fairfield County.

In accordance with Part III of NPDES Small MS4 Stormwater General, a Stormwater Management Program (SWMP) was designed to reduce the discharge of pollutants to the maximum extent practicable (MEP) from the permitted MS4 owned and operated by the jurisdictions and to satisfy the appropriate water quality requirements related to water pollution control and the Federal Clean Water Act. The SWMP includes management practices, control techniques, system designs, and engineering methods and addresses the following six Minimum Control Measures (MCM):

- 1) public education and outreach
- 2) public participation/involvement
- 3) illicit discharge detection and elimination (IDDE)
- 4) construction site runoff control
- 5) post-construction runoff control
- 6) pollution prevention/good housekeeping for municipal operations.

This document memorializes the plan of the NPDES Small MS4 Stormwater General Permit.

### **SECTION 3.1 Supporting Documents**

This document does not stand in isolation but rather supports the greater water quality efforts as described in the documents titled;

2022 Storm Water Management Plan -Fairfield County, OH and Violet Township, OH  
2022 Storm Water Management Plan -Liberty Township, OH Sections 6 and 30R  
2023 Storm Water Management Plan -Village of Lithopolis, OH

### **SECTION 3.2 Coordinating Agencies**

This document reflects the cooperative effort by several departments and agencies dedicated to addressing public health issues and protecting and managing water resources. The following partner agencies are involved with this effort:

Fairfield County Commissioners (FCC)  
Fairfield County Engineer (FCE)  
Fairfield County Utilities (FCU)

Violet Township (VT)  
Liberty Township (LT)  
Village of Lithopolis (VL)  
Fairfield County Health Department (FCHD)  
Fairfield Soil and Water Conservation District (FSWCD)

#### **SECTION 4.0 Public Health Nuisance**

Fairfield County Health Department staff has the authority to enforce OAC 3701-29 and ORC 3718 for the resolution of illicit discharges determined to be causing a public health nuisance. It is important to note that while various HSTS discharge effluent; these discharges may or may not be illicit discharges. As a general rule of thumb, if the HSTS discharging effluent is ‘operating as intended’, the resulting discharge is NOT an illicit discharge. These determinations are undertaken by FCHD.

#### **SECTION 5.0 Local Controls Related to Stormwater Regulation**

Ohio Revised Code; Chapters:

3707  
3709  
3718  
3767

Ohio Administrative Code 3701-29

Board of County Commissioners Resolutions, November 22, 1983 and July 1, 1986  
Sewer Use Ordinance Resolution 89-12.07d

Board of County Commissioners Resolution, January 28, 1981, Journal Volume 27 Page 470  
Fairfield County Engineers Office Permit Approval Guideline July 26, 2012

#### **SECTION 6.0 HSTS, and Stormwater Mapping**

Fairfield County Phase II NPDES Stormwater Permit partner agencies have made significant strides in mapping stormwater infrastructure and HSTS within their jurisdictions. This effort has developed as four separate, but interactive and overlapping efforts which aid in identifying illicit discharge risks in the MS4 and surrounding areas.

Each of these efforts were developed by means of a Geographic Information System (GIS) utilizing, field data, engineering plans, geo-referenced aerial photography, and various other shared digital data sets. Drainage Maintenance Districts under the direction of the FCE include construction plans. The Village of Lithopolis maintains a file of construction plans.

## SECTION 6.1 Stream Resource Geodatabase

The stream mapping and outfall inventory project was initiated in 2007 to map storm water outfalls in Fairfield County/Violet Township and cross connections with Liberty Township and the City of Pickerington. This dataset documents the ‘Waters of the State’ as defined in the NPDES permit as well as subsurface drainage components when these data layers are available. The Village of Lithopolis continues to build their mapping resources as of 2022.

The connectivity and directionality inherent in this data set allows users to discern directions of flow for all segments of the dataset with the use of county topographic information. This ability allows users to determine where the stormwater will flow from any given location, as well as the structures and/or features that contribute flow to any given location. All of the features within this dataset are associated with stream names as well as the larger watersheds.

FCU initiated a mapping and inventory of all sanitary sewers in 2008. This information can be coordinated with all outfalls and HSTS systems in the area.

The Village of Lithopolis continues to build their sewer mapping resources as of 2023. This dataset continues to be updated as additional data is obtained through field work and as new stormwater locations are made available

## SECTION 6.2 Outfall Inventory (OI)

The OI was undertaken in 2007 for Fairfield County/Violet Township areas. This project required extensive field work, as Fairfield Soil and Water Conservation District staff walked all streams collecting the geospatial location and descriptive attributes of all public and private, drainage features with Global Positioning System (GPS). All data was differentially corrected, manually adjusted to match current aerial photography and imported into a file geodatabase with links to digital photos from the field. The OI included an abbreviated initial Dry Weather Screening (DWS) of all drainage features including smell and color observations. This process requires field inspection of drainage features during periods of dry weather. Dry weather for this screening is defined as having a maximum of .01” of rain during the previous 72 hours. This ‘dry weather’ protocol helps to minimize flows due to rain or snow melt events and highlights illicit discharges.

The DWS conducted with the OI entailed recording a variety of characteristics for each feature screened, including a physical description of the drainage feature, any indicators suggesting an illicit discharge, and a digital photograph of the feature. GPS data loggers were used to record the location and descriptive information of the features. The data was then processed, analyzed, and mapped utilizing GPS. The analysis assisted in determining which drainage features are likely to contain illicit discharges.

The groups of features screened during OI were:

**Flowing Pipes:** outfalls with flow at the time of screening

Note: outfalls with flow within catch basins are included in this group

**Non-Flowing Pipes:** outfalls with no flow at the time of screening

Note: outfalls without flow within catch basins are included in this group

**Flowing Channels:** constructed or man-made channels with flow at the time of screening

**Non-Flowing Channels:** constructed or man-made channels without flow at the time of screening

**Catch Basins:** catch basins with or without flow at the time of screening

**Generic Points:** locations not fitting into the above categories, but which are of interest to stormwater management and illicit discharges: i.e. seeps, unknown water sources, dump sites, etc.

In addition to the features dry weather screened, the locations of crossovers (drainage passing under roadways or structures) and manholes were collected to assist in developing stormwater flow lines in the stream map. To allow efficient referencing and tracking of the features dry weather screened, a nomenclature was developed for the various types of features screened which associated each feature with the year it was screened and the township in which it is located. FSWCD has coordinated with FCHD and the FCE on the OI since 2007.

The Village of Lithopolis continues to build their dry weather screening program as of 2023.

### **SECTION 6.2.1 Identifying Potential Illicit Discharges**

Features are categorized by their potential to be a source of illicit discharge and whether or not they are an obvious (severe) source of an illicit discharge. The criteria used to identify potentially illicit discharges are considered stand-alone indicators. These are odor, color, floatables, poor pool quality, benthic growth, deposits and stains. The presence of at least one of these criteria can designate the outfall as potentially illicit.

It is important to identify obvious (severe) sources of illicit discharge during dry weather screening because the presence of obvious indicators (e.g. raw sewage) allows that feature to be prioritized for future follow-up investigation and resolution. For a location to be determined as an obvious (severe) source of an illicit discharge, it must have a least one of several specific, pre-defined stand-alone indicators.

### **SECTION 6.2.2 Effluent Sampling**

To better understand what was being observed during OI in Fairfield County/Violet and Liberty Township areas and to verify the accuracy of the dry weather screening conducted with the OI, follow-up effluent sampling of potential illicit discharge was done for in 2013 and completed in 2015. These water samples were processed at an OEPA certified lab to determine the amounts of pollutants, such as Methylene Blue Active Substances (MBAS) due to the high volume of geese on retention basins and the regular observation of coyotes and raccoons in the storm water pipe systems. The permitted jurisdictions elected not to test for fecal content at the time. These lab results were included in the GIS and are available to the FCHD, FCU and VL.

Areas where elevated counts of MBAS were found will be monitored annually until the source is eliminated or reduced significantly.



The Village of Lithopolis continues to build their sampling protocol as of 2023.

### **SECTION 6.2.3 Dry Weather Screening of MS4 Outfalls**

DWS of regulated MS4 outfalls during the term of the permit was conducted in 2013 and completed in 2015 for the presence of MBAS. Regulated MS4 outfall screenings will be conducted such that each outfall is screened at least once during each permit period.

The Village of Lithopolis continues to build their sampling protocol as of 2023.

### **SECTION 6.3 MS4 Mapping**

Starting in 2012, a cooperative effort between the FCE, VT, LT (2013), City of Pickerington and FSWCD was initiated to develop stormwater sewer mapping (MS4) for areas of Fairfield County. This mapping involves referencing engineering drawings as well as field verification of features and feature locations for the development of several GIS data layers. This data is being developed for incorporation into the existing database, and will be continually modified as information becomes available.

The FCE coordinates Drainage Maintenance Districts in the area and maintains construction documents and maps for them.

This effort required cooperation and coordination with the townships due to the lack of storm sewer mapping through a majority of the township jurisdictions. There is considerable institutional knowledge on the location and condition of the storm sewers, but this knowledge has not historically been translated into plans (hard copy or digital).

The Village of Lithopolis continues to build their mapping as of 2023.

### **SECTION 7.0 FCHD Operation and Maintenance Program**

FCHD maintains an operation/maintenance program for all aeration treatment systems that discharge to MS4s, watercourses, field tiles, or other sources. This program includes permitting, annual observations of the discharging system, and enforcement of aeration treatment systems that create public health nuisances and/or illicit discharges. Water Quality environmental health technicians conduct annual observations of all aeration treatment units in Fairfield County as per the operation/maintenance program. If by the second observation the system does not appear to be functioning correctly, a referral will be made to the Board of Health for further investigation and enforcement by sanitarians.

## **SECTION 7.1 IDDE Program Investigations and Enforcement**

FCHD Staff sanitarians are responsible for investigating all sewage nuisance complaints in cooperation with the jurisdictional authorities. The nuisance complaints investigated by staff sanitarians come through complaints from the general public and referrals from partner agencies. When it is alleged or a complaint is made that an HSTS is causing a public health nuisance as defined in OAC 3701-29 and ORC 3718, then FCHD has the authority to investigate such complaints and allegations. Upon staff verification of a public health nuisance the abatement process for public health nuisances will be initiated.

## **SECTION 7.2 Connection to Central Sanitary Sewer**

FCHD possesses the authority to require that whenever a central sanitary sewerage system is determined to be available and accessible to a property with an HSTS, the household sewage treatment system shall be abandoned and the house sewer shall be directly connected to the central sewerage system. This authority applies regardless of the manner by which the sanitary sewerage system was issued constructed, or the operational condition of the HSTS. A process of enforcement will be issuing to the property owner Notice(s) of Violation, a Board of Health Order, or filed for injunctive relief in Fairfield County Municipal Court.

## **SECTION 7.3 Identified Areas of Concern**

In addressing the topic of prioritizing IDDE activities, a historical perspective of public health risks and sanitary sewers needs in Fairfield County needed to be explored. Efforts were initiated to address several areas identified as having the worst ‘known’ sewage problems. At this point in time, there were no comprehensive datasets or objective analysis of these problems; these areas were derived from subjective interpretation of the then-current staff.

Many areas had discharging and non-discharging (soil absorption) HSTS that were aging and potentially causing public health nuisances. As the terminology of the NPDES permits came into use, illicitly connected or malfunctioning HSTS became known as illicit discharges. By default, as plans are implemented to provide sanitary sewer services to these areas, discharging HSTS were disconnected from the MS4s.

### **Known Sewage Problems as of January 2022**

1-Fairfield County/Violet Township-Bates Crawford

*EPA Plan 4-27-18*

2-Fairfield County/Violet Township-Robinwood Acres (Terry Lane) *Monitoring*

## **SECTION 7.4 Public Health Nuisance Abatement Process**

Officials have made great strides in documenting and analyzing the extent of illicit discharges in Fairfield County – the predominant issue being HSTS. In addressing the health risks to Fairfield County residents and in keeping pace with the NPDES permit requirements, a thorough, cooperative, multi-faceted approach to address these illicit discharges is underway.

Fairfield County Health Department staff has the authority to enforce OAC 3701-29, ORC 3718 for the resolution of illicit discharge determined to be causing a public health nuisance.

FCHD will continue to investigate all public health nuisance complaints related to failed or failing HSTS reported by normal channels, FSWCD and FCHD website and e-mail as they are received **whether or not the complaints are affecting the MS4**. Any aeration treatment system that fails its observations/inspections will be referred to sanitarians to investigate and determine if a public health nuisance exists.

### **SECTION 8.0 Identifying Aeration Systems Connected to the MS4**

FCHD staff verified aeration system connections in the MS4 using various investigation methods. They continue to review permit records for notations regarding the discharge point of the aeration system (storm sewer, ditch, stream, waterway, etc.). Sampling results from the DWS of storm sewer outfalls helped with the determination of connections to the MS4 to create a database layer that mapped using Geographic Information System (GIS) software to meet NPDES requirements. These identified potential connections to MS4s will be routinely checked and this list further refined by FCHD staff as routine aeration treatment system observations and complaint investigations are conducted.

### **SECTION 9.0 Communication and Outreach**

The success of the IDDE plan depends, in part, on communicating it to the stakeholders and the public affected, and on providing the opportunity for community participation and input from various venues. The goal of this communication and outreach is for the community to understand the IDDE plan, why it is required and its purpose, who is responsible for its implementation, when and how it will be implemented, and how it may affect their lives.

Fairfield Soil and Water Conservation District is facilitating a communication and outreach advisory group composed of the Public Officials coordinated at a county wide level with all MS4 communities and their partnering or contract agencies annually. The purpose of this group is to prepare consistent messages and communication strategies for the agencies involved in meeting the requirements of the Fairfield County NPDES Storm Water Permit to use in outreach and educational efforts for the community.

The following is the Communication Planning Tool that will be used to guide our outreach and education efforts.

### **SECTION 9.1 IDDE Communication Plan**

#### **Communication Goal**

Fairfield County/Violet Township, Liberty Township and the Village of Lithopolis will continue to provide education and outreach regarding the operation, maintenance, and discharge of home sewage treatment systems. Citizens and property owners living within their jurisdictions will have a better understanding of the environmental and public health concerns associated with illicit discharges such

as hazardous chemicals and failed HSTS and semi-public sewage treatment systems discharging into a MS4. This understanding will include: the NPDES Storm Water Permit requirements that require specific actions by homeowners of failing HSTS, including application to the Ohio EPA for new HSTS systems; the scientific facts about the risks associated with failed HSTS; the options available to residents in areas at higher risk for exposure to waterborne pathogens as a result of failing systems to protect their health and the environment; and where citizens can report illicit discharge and failed HSTS.

### **Communication Objectives**

Fairfield County/Violet Township, Liberty Township and the Village of Lithopolis along with FCHD, FCE, FCU and the FSWCD will meet the goal of the communication plan by continuing to develop and maintain resources and activities in the form of written materials for community forums, websites, mailings, brochures, news releases, and displays. FCHD, FCU and the FSWCD will make these resources available to county and township partners for use in conjunction with their community outreach and education programs and venues.

### **Future Communication and Outreach**

Fairfield County/Violet Township, Liberty Township and the Village of Lithopolis intends this Plan to serve as a blueprint for its activities but recognizes that communication plans often require adjustment to deliver effective messages. As such, it is intend that this plan is periodically reviewed to ensure effective outreach and education. The central hub of the communication plan is an IDDE information section on the FSWCD website at [www.fairfieldswcd.org](http://www.fairfieldswcd.org) in partnership with resources from FCHD website at [www.myFCHD.org](http://www.myFCHD.org). This website provides education and information for the public including definitions, background of the problem, areas of concern for public health risks from failing HSTS, tips for homeowners to reduce their risk of disease, maintenance, and plans for addressing these concerns.

Educational brochures, displays, and presentations for property owners and communities will supplement these websites. These educational tools will increase awareness about identifying and reporting illicit discharges, eliminating illicit discharges, and managing private and semi-public sewage treatment systems to minimize environmental and public health risks.

As previously stated, communication planning will continue to evolve with input from the Fairfield County Regional Planning Commission Storm Water Advisory and Education Subcommittee to educate communities and individuals on the implementation of the broader IDDE Plan and other NPDES Permit requirements.

## **SECTION 10.0 Reporting Illicit Discharges**

The IDDE Program benefits from citizen reports regarding spills, illegal dumping, sewage and other observed pollution. Various avenues for reporting are available to the community depending on the material or liquid being discharged. Fairfield County/Violet Township, Liberty Township, Village of Lithopolis, Fairfield County Engineer, Fairfield County Utilities, Fairfield Soil and Water Conservation District, City of Pickerington, City of Canal Winchester, Franklin County Public Health

and Fairfield County Health Department receive reports regarding pollution in storm sewers, ditches and waterways. The corresponding agencies take this information and forward it to the responsible agency. Specific information on agency responsibility can be found below and is published in educational information found on websites and in brochures.

Citizens are encouraged to report any water pollution related complaint or concern outside of HSTS and emergency chemical spills to the OEPA. Non-emergencies can also be reported to OEPA Central District Office at (614)-728-3778.

Questions or concerns regarding the Fairfield County/Violet Township storm water management program can be directed to the Fairfield County Utilities office at (740) 652-7120.

Questions or concerns regarding the Liberty Township storm water management program can be directed to the Liberty Township Trustees office at (740)564-6108.

Questions or concerns regarding the Village of Lithopolis storm water management program can be directed to the Village office at (614) 837-2031.

### **SECTION 10.1 Reporting Chemical Spills and Illegal Dumping Into Storm Sewers**

The OEPA maintains a task force of responders for complaints of emergency chemical spills into the waters of the state. The toll-free 24/7 hotline is 800-282-9378.

### **SECTION 10.2 Reporting Sewage in Storm Sewers from Aeration Treatment Systems or Failed HSTS**

This pollution source is a priority pollutant for our IDDE program. Fairfield County/Violet Township, Liberty Township, Village of Lithopolis, Fairfield County Engineer, Fairfield County Utilities, Fairfield Soil and Water Conservation District, City of Pickerington, City of Canal Winchester, Franklin County Public Health and Fairfield County Health Department will receive complaints about sewage found in storm water or storm sewers. If the complainant calls any one of these agencies, the complaint will be forwarded to the FCHD for investigation. Intra-agency referrals from other program staff of non-functioning HSTS will be forwarded to FCHD.

Fairfield County Health Department, is responsible for addressing pollution reports related to sewage. They can be contacted by calling (740)652-2800.

### **SECTION 11 Complaint Management, Tracking and Response**

Upon receiving sewage related complaints, staff will log the complaint to track it until abated or dismissed. All the activity related to that complaint will be logged and tracked as necessary. Staff will determine the source of the sewage by dye testing or other methods, and work to remove or mitigate the pollution source from the MS4 by education, notice of violations, Board of Health orders, or legal mechanisms through the court system if necessary.