

Ottawa County Road Commission
MS4 NPDES Application
Response to Question 1

Enforcement Response Procedure

The Ottawa County Road Commission is committed to MS4 Program compliance and places a high priority on stormwater quality. The Environmental Coordinator is responsible for investigating and responding to potential violations and taking enforcement action when a violation occurs.

When enforcement action is required, a letter is sent to the responsible party indicating corrective action is required within a specified number of days. When necessary, the applicable Township Supervisor and/or Road Commission attorney will be asked to assist in achieving compliance. Specific situational procedures include:

Illicit Connections

1. OCRC will notify the responsible party in writing that they have 30 days to completely disconnect the illicit connection. Copies are also provided to the applicable township and to the Ottawa County Water Resources Commissioner's (OCWRC's) Office.
2. If the connection is not eliminated in 30 days per the initial letter, then the township and/or OCWRC are asked to provide enforcement assistance.
3. If the connection is not eliminated within 60 days of the initial letter, then the case is referred to the OCRC attorney for enforcement.

Illegal Dumping and/or Spills

1. OCRC staff will investigate within one business day, or the next business day if after hours, of receiving notification that illegal dumping or a spill has occurred.
2. Once the responsible party is identified, a letter will be sent directing them to take action to stop the dumping or clean up the spill within 24 hours of receiving the letter. Copies are also provided to the applicable township and to the OCWRC's Office.
3. If the responsible party does not take action to stop the dumping or clean up the spill within 24 hours of receiving the letter, then the case is referred to the township or OCWRC's office for enforcement.

Construction Site Storm Water Runoff Control (Soil Erosion and Sediment Control)

1. As an Authorized Public Agency under Part 91, the OCRC has 13 certified storm water operators on staff who are responsible for soil erosion controls at their project sites. If soil or sediment is discharged to an MS4 it shall be documented on the SESC inspection report indicating the date of discharge, location, type of control that failed, corrective action, notification date, completion date. Corrective action measures will be completed within 24 hours of notification.
2. When notified by the public of a soil erosion or sediment discharge to a MS4, the certified storm water operator assigned to the project shall investigate within 24 hours of complaint, document as described above and take corrective action within 24 hours of investigation.

Post Construction Runoff Control Program

1. The Post Construction Runoff Control program is enforced by the local municipality or the OCWRC's office.
2. The OCRC will receive and document citizen complaints and forward the information to the appropriate local municipality or OCWRC's office for enforcement.
3. If complaints are received or violations discovered on OCRC projects, the OCRC Environmental Coordinator will work with the appropriate enforcing entity to bring the OCRC project back into compliance within the applicable timeframe.

In the past, a hard copy of complaints and violations were retained in the Environmental Coordinator's office. Hard copies will still be retained. However, in order to better track instances of non-compliance, the Environmental Coordinator shall maintain a spreadsheet to track the following:

- Date of violation
- Location of violation
- Responsible party
- Violation Type
- Enforcement action
- Date of compliance

OTTAWA COUNTY ROAD COMMISSION
STORMWATER VIOLATION ENFORCEMENT ACTION

DATE OF VIOLATION	LOCATION OF VIOLATION	RESPONSIBLE PARTY	VIOLATION TYPE	ENFORCEMENT ACTION	DATE OF COMPLIANCE
				1	
				2	
				3	
				4	
				1	
				2	
				3	
				4	
				1	
				2	
				3	
				4	
				1	
				2	
				3	
				4	
				1	
				2	
				3	
				4	
				1	
				2	
				3	
				4	