Toledo-Lucas County Health Department Standard Operating Procedure				
Stay informed. Stay healthy.				
Original Effective Date:	Review / Revision Date:	Environmental Health Procedure:		
August 3, 2017		2017.08.026		
Maintenance Steward: Environmental Health Supervisor in charge of Water Quality History: Image: New				
Organizational Scope:				
🗆 Full Agency 🗆 Administration 🗆 Community Services 🛛 Environmental Health 🗆 Health Services				
Frequency of Review:				
□ Annually □ Biennially ⊠ 5 Years ⊠ As Needed □ Other:				
Location:				
G-Drive: G: \rightarrow Users \rightarrow Common \rightarrow Policies & Procedures				
Website: www.lucascountyhealth.com/employee-login/				
Hardcopy: Environmental Health Supervisor's Office.				
Archived Version(s)				
Requisite Signatures				
Health-Commissioner	Λ Λ.	08-03-12 Date		

Director of Environmental Health & Community Services

8/3/2017 Date

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I. Scope

This procedure applies to the water quality sanitarians and environmental health clerks in the Environmental Health Division at the Toledo-Lucas County Health Department.

II. Purpose

The purpose of this procedure is to provide an efficient, consistent, and timely process for identifying, mapping and the elimination of illicit discharges into the Lucas County Stormwater sewer system and the waterways of the State and to assist the Lucas County Engineer Office (LCEO) to achieve compliance with the Environmental Protection Agency (EPA) Stormwater Management Permit.

III. Background

The Toledo-Lucas County Health Department (TLCHD) will implement the Memorandum of Agreement with the LCEO for EPA Stormwater Management Permit Compliance Services in conjunction with enforcement of regulations regarding Household Sewage Treatment System (HSTS) in accordance with Chapter 3718 of the Ohio Revised Code and Chapter 3701-29 of the Ohio Administrative Code.

The TLCHD has been designated by LCEO to coordinate an Illicit Discharge Detection and Elimination Program for the overall management and implementation of said program as agreed upon on July 13, 2005. TLCHD will also assist in the Student Watershed Watch Program by providing public health environmental education instructions to Lucas County School aged children which helps support the Public Education Minimum Control Measures.

IV. Procedure

A. Criteria for designation of a Critical Sewage Areas (CWA) within Lucas County include:

- 1. Known areas of failed/failing existing HSTS;
- 2. Known areas of stormwater contamination;
- 3. Public Complaints;
- 4. Residential areas constructed prior to 1970;
- 5. Residential areas with constricted lot sizes (small lot size);
- 6. Residences with HSTS that converted to central sewers;
- 7. Areas with access to existing storm and central sewers;

B. Illicit Discharge Detection and Elimination Within the Critical Sewage Areas

- 1. Initiate contact with residents in priority areas with first and second attempt letters followed by door-to door visits:
 - a. Letters to residents detail the scope, purpose and importance of the Stormwater Management Program,
 - b. Include educational materials on common types of illicit discharges, common locations of discharges and the effects of illicit discharges.
- 2. Request a site visit to survey, inspect, and or conduct dye tests when warranted.
- 3. Conduct visual inspection of plumbing within the dwelling to determine if an illicit grey water discharge is present.
 - a. Verify that all plumbing is connected to the existing HSTS or Gray water Recycling System (GWRS).
 - b. Verify that waste water from washing machines, sinks, toilets, showers or the like are connected to the HSTS and not illegally discharging to storm sewers, ground surface or bodies of water via sumps, floor drains or other methods.
 - i. When warranted, dye testing of the dwellings' plumbing can be utilized to confirm sewage connection to the HSTS or to confirm an illicit discharge.
 - ii. Water sampling may be utilized if necessary to confirm discharge points.
 - iii. Record results of all inspections, dye testing and sampling with field documents and photographs.
- 4. Results from the inspection will be recorded into the Stormwater Management Program quarterly spreadsheet located on the G drive.
- 5. Update the sewage record maintained on the GIS software for the applicable address.
- 6. Notice of Violations shall be issued to the property owner should an illicit discharge be positively identified as a result of the site inspection, dye test and/or water sampling. Due process shall include:
 - a. Notice of violation
 - b. Second and final notice of violation

- c. Office summons
- d. Court proceedings

C. Illicit Discharge Detection and Elimination Outside the Critical Sewage Areas

- 1. Conduct stormwater inspection in conjunction with:
 - a. Property Improvement Evaluation inspections (P.I.E)
 - b. Mortgage Inspections
 - c. HSTS inspections New, Repair, Alteration or Consultation
 - d. Private Water Sampling
 - e. Semi-Public STS inspections
- 2. Conduct visual inspection of plumbing within the dwelling to determine if an illicit grey water discharge is present.
- 3. Verify that all plumbing is connected to the existing HSTS or Gray water Recycling System (GWRS).
 - a. Verify that waste water from washing machines, sinks, toilets, showers or the like are connected to the HSTS and not illegally discharging to storm sewers, ground surface or bodies of water via sumps, floor drains or other methods.
 - i. When warranted, dye testing of the dwellings' plumbing can be utilized to confirm sewage connection to the HSTS or to confirm an illicit discharge.
 - ii. Water sampling may be utilized if necessary to confirm discharge points.
 - iii. Record results of all inspections, dye testing and sampling with field documents and photographs.
 - Results from the inspection will be recorded into the Stormwater Management Program quarterly spreadsheet located on the G:\ENV\SWMP\Quarterly Spreadsheet.xlsx
- 5. Update the sewage record maintained on the GIS software for the applicable address.

- 6. Notice of Violations shall be issued to the property owner should an illicit discharge be positively identified as a result of the site inspection, dye test and/or water sampling. Due process shall include:
 - a. Notice of violation
 - b. Second and final notice of violation
 - c. Office summons
 - d. Court proceedings

D. Dry Weather Outfall Inspections

- 1. Visually inspection all recorded outfalls in Phase II Areas per requirements of the Lucas County NPDES permit issued by Ohio Environmental Protection Agency (OEPA).
- 2. Complete Dry Weather Outfall Inspection Form.
- 3. Submit inspection information to Lucas County Engineer's Office with the Quarterly Reports.

E. Quarterly Report

1. Submit Quarterly Reports to the Lucas County Engineer's Office for submission to the OEPA.

V. Maintenance

A. Review

1. The Stormwater management program standard operating procedure is to be reviewed every 5 years or when Memorandum of Agreement with the Lucas County Engineer's office is revised to ensure compliance with both agency and accreditation standards.

B. Revision

- 1. All changes made to this SOP are to be noted on the **Record of Change**. Substantial changes will require renewed signatures from all applicable parties. This includes changes to the intent, scope, procedures, or policy statement.
- 2. Changes in style, format, grammar or minor error correction will not require renewed signatures but must be indicated on the Record of Change.

Record of Change (Required for all policies)

Date of Change	Changes Made By	Changes Made/Notes	Approved By