



NISWAG

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MS4 Permit Changes MCM3

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MCM3

Illicit Discharge Detection and Elimination

Overview

Develop an Illicit Discharge Detection and Elimination (IDDE) program to detect, address, and eliminate illicit discharges into the MS4 conveyance system.

IDDE Ordinance

- Review and update an ordinance
- Timeline: within 12 months of permit coverage
- prohibits illicit discharges into MS4 conveyances
- establishes enforcement policy and procedures.

Allowable Discharges

Section 1.0 of the permit

“General Permit Coverage”

(1) Water line and hydrant flushing	(2) Irrigation water
(3) Footing, foundation, and crawl space drains (Uncontaminated)	(4) Storm sewer cleaning water (Uncontaminated)
(5) Fire suppression activities	(6) Uncontaminated ground water
(7) Springs	(8) Residential car washing
(9) Non-commercial car washing by community organizations	(10) External building wash down, without detergents
(11) Dechlorinated/debrominated residential swimming pool discharges	(12) Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20))
(13) Pavement wash waters provided spills or leaks of toxic or hazardous materials have not occurred (unless all spill material has been removed) and where detergents are not used	(14) Uncontaminated condensate from air conditioning units, coolers, and other compressors, and from outside storage of refrigerated gases or liquids

- Removed: Potable water sources, lawn watering
- Added: non-commercial washing by community organizations
- Added: “debrominated” for pool discharges
- Added more description to “air conditioning condensate”
- “uncontaminated” added for clarification

IDDE Plan

- Develop or review and update an IDDE plan
- Timeline: within the first year of permit coverage

Illicit Discharge Detection and Elimination (IDDE)

Identification, Elimination, and Documentation



IDDE Plan

- Include a schedule to screen all outfalls owned and operated by the MS4
 - 100 percent of the outfalls are to be screened by the 5th year of the permit term.
 - Suggestion goal is 20% per year.



IDDE Plan

- Include SOPs (standard operating procedures)
 - Locate discharges
 - Determine the source
 - Remove the discharge
 - Guidance and forms

OUTFALL SCREENING FOR ILLICIT DISCHARGES STANDARD OPERATING PROCEDURES

1) Purpose

This procedure describes how the Town will screen stormwater outfalls for illicit discharges.

2) Responsible Entity – MS4 Planning Team

3) Process

- a) Dry weather screening is a field test method for inspecting storm water drainage area outfalls to help locate and identify illegal discharges to the storm water system.

IDDE Plan

- Minimum SOP requirements
 - Initiate investigation within 2 days of notification
 - Inspection and re-inspection requirements to ensure compliance
 - Written procedure for internal communications
 - Procedure that defines an illicit discharge and when it is considered “eliminated”
 - How to prioritize illicit discharges with highest priority being
 - Sanitary sewage
 - Direct dumping of pollutants
 - Reporting to other authorities (hazardous materials office or IDEM)

IDDE Plan

- Document actions taken
 - Date the discharge was observed
 - Results of the investigation
 - Follow up to the investigation
 - Date investigation is closed

DATE	COMPLAINT TYPE	REPORTING METHOD	DESCRIPTION	RESOLUTION
1/26/2018	Good housekeeping	Other	Uncovered salt pile. Salt pile located near storm inlet. Large piles of salt applied to street instead of spread more evenly. Masonry cement stored in an area that holds water and uncovered.	Discussed with Leasing agent and they had already addressed with Lawn care/property company that had been hired to salt. The salt was going to be removed, but will be covered until then. Calibration on spreader trucks will be investigated.
3/1/2018	Spill	Other- County EMA	Spill of diesel out of generator.	Much of the diesel was captured in the aquaswirl onsite, but some reached the pond. Site was handed over to IDEM to oversee clean-up. Spill cleanup company was hired to clean pond and aquaswirl. Sod was removed and product was recovered from soil.

IDDE Plan

- Public Reporting of Illicit Discharges
 - Identify a contact person for complaints
 - Make contact information available
 - Utilize a hotline, website and/or 24-hour emergency phone number
 - It must be checked at least once each business day.



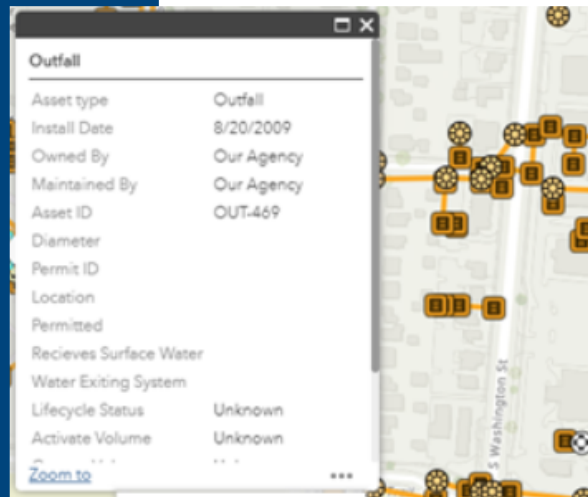
Mapping

- Newly designated MS4 entities
 - must develop a plan to map outfalls in year one and demonstrate continual mapping progress that will result in 100 percent to be completed by the fifth year of the permit.
- MS4 entities renewing permit coverage
 - must review and update maps as changes occur to MS4 conveyances and as new collection and discharge systems are added. The MS4 entity must modify existing maps to identify all receiving waters in the MS4.

Mapping

Map must identify the following:

1. Alphanumeric identifier for outfalls
2. Lat/long in decimal degrees (5 decimal point accuracy)
3. Receiving waters
4. 303D listed waters
5. TMDL waters
6. Description of the outfall and photograph



Mapping

Identify on a map high priority areas based on:

1. Land use
2. Prior history
3. Frequency of discharges

Map must delineate drainage areas

This requirement must be completed in the first year



Training

Develop training program

1. Annual training for those investigating discharges
2. Document – name, title, responsibility
3. Within 180 days of IDDE certification



CSO Long Term Control Planning

Ensure consistency with

- CSO Long Term Control Plan
- Combined Sewer Overflow Operational Plan



Annual Reports

- Status of Measurable Goals (Programmatic Indicators removed)
- If objectives are not met, explain the problem encountered and changes made to resolve the problem
- IDDE program updates
- Summary of mapping changes
- Number of new outfalls mapped
- Number and location of outfalls screened
- Number and location of discharges detected
- Number and location of discharges eliminated
- Number of discharges or spills reported
- Number of enforcement actions taken



QUESTIONS

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