
Appendix C

Illicit Discharge Detection and Elimination

Illicit Discharge Detection & Elimination

Introduction:

The Illicit Discharge Detection and Elimination Program is required under S5(B)(3) of the Eastern Washington Phase II Municipal Stormwater permit. The IDDE program requirements for secondary permittees are in section S6(D)(3) of the permit.

An illicit discharge is defined as any discharge to the storm sewer system that is not composed entirely of stormwater. Illicit discharges may come from an illegal connection to the storm sewer, spills or intentional dumping of wastewater or pollutants into a storm drain.

Objective:

The primary objective is to eliminate illicit discharges to surface water and groundwater. This will be accomplished through detection of illicit discharges, the removal of illicit connections, stormwater education and enforcement of the local stormwater regulations.

Performance Measures (IDDE Program Elements):

I. Storm Inventory & Maps

Each jurisdiction uses GIS to maintain a map of the storm sewer system. Secondary permittees will maintain a storm sewer system map. These maps will include the following elements:

- i. Location of all known and new connections to the system authorized and approved by the local jurisdiction
- ii. All known outfalls
- iii. Names and locations of all waters of the state that receive stormwater discharges
- iv. Areas served by discharges to ground

Stormwater maps are updated at least annually to include new subdivisions and stormwater facilities. Each jurisdiction has a procedure for maintaining documentation of information included on the maps, this can be found in the Operation and Maintenance Plan.

II. Local Regulation

Each local jurisdiction has adopted an ordinance or resolution to prohibit illicit discharges, including discharges occurring on private property, and authorize enforcement action. The Illicit Discharge Detection and Elimination Ordinances and Resolutions can be found in Appendix H. The local regulations will be updated to meet the new permit requirements before

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February 2, 2019. At a minimum the updates will include adding dechlorinated spa discharges to the list of conditionally allowable discharges.

Based on the local ordinance or resolution an IDDE Response Plan has been developed. The plan includes:

- i. An enforcement matrix/flowchart
- ii. Escalating enforcement actions including:
 1. Verbal/Written Warning
 2. Administrative Action
 3. Administrative Action with Fine and/or Cost Recovery
 4. Legal Action

The complete IDDE Response Procedures can be found in Appendix A.

Secondary permittees will implement policies to prohibit illicit discharges and to ensure compliance with the local IDDE ordinances or resolutions. This policy will include an enforcement plan to ensure compliance. They will also implement a spill response plan that includes coordination with qualified spill responders.

III. Detection and Identification of Illicit Discharges and Connections

Illicit discharges and connections will continue to be detected through field assessments, the investigation of complaints, and from monitoring data. The local jurisdiction will respond to potential illicit discharges within 7 days. Potential illicit connections to the storm sewer system must be investigated no later than 21 days from the time of the initial report or discovery.

A. Priority Areas

The local agencies have determined priority areas likely to have illicit discharges based on the following criteria:

- i. Land use and associated business/industrial activities that may cause illicit discharges
- ii. Past illicit discharge incidents and reports received
- iii. Areas with storage of large quantities of materials or hazardous substances that could result in spills and negative environmental impacts

The list of priority areas is periodically reviewed and updated as needed. Field surveys are conducted based on the list of priority areas and outfalls.

B. Field Assessments

Field assessments are conducted to include evaluating outfalls and priority areas. These assessments should occur during dry weather to detect any potential illicit discharges and will be scheduled based on a prioritized list. Recordkeeping in the

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field is done using either a field log book or an inspection report form. The jurisdiction may also use an electronic database to track inspection information. Reports include information on suspected illicit discharges, the date, time, location, observations, test results and if a sample was collected for further analysis.

C. Stormwater Hotline

Each jurisdiction will continue to maintain and publicize a telephone number for the public reporting of spills and other illicit discharges. In Wenatchee the phone number is 888-3235, in Chelan County the number is 667-6415 and in Douglas County and East Wenatchee the number to call is 886-3728. These phone number are publicized using the following methods: websites, brochures, phone book, and public outreach materials like refrigerator magnets.

D. Public Education

As part of the Public Involvement, Education and Outreach plan, a list of target audiences and relevant topics was developed. This list can be found in WWSWMP Appendix B.

IV. Illicit Discharge Elimination Program

Each jurisdiction has implemented an IDDE program to address illicit discharges, including spills, and illicit connections to the stormwater system. The program outlines steps to take to characterize the nature of the discharge, to trace the source and to eliminate the discharge. The primary difference in the plans is the enforcement action allowed under the local regulations. The complete IDDE Response Procedures for each jurisdiction can be found in Appendix A.

Per the permit, any illicit discharge into a stormwater system which could constitute a threat to human health, welfare or the environment will be investigated immediately and the appropriate action taken to correct or minimize the threat. The response may include referral of the violation to another appropriate agency such as the local emergency response team or the Department of Ecology.

The local jurisdictions will investigate any complaints or reports of potential illicit discharges within 7 days. Potential illicit connections to the storm sewer system will be investigated no later than 21 days from the time of the initial report or discovery. Upon confirmation of an illicit connection the local jurisdiction will work with the responsible party to have the connection eliminated within 6 months.

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V. Training

IDDE program training has been provided to all municipal staff including office and field staff. Follow-up training will be provided as needed for new staff members and to address changes in procedures.

- i. Stormwater utility and code enforcement staff were trained on identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, and illicit connections.
- ii. Office staff was trained on procedures for documenting an incident or complaint.
- iii. Other municipal staff including but not limit road maintenance crews and building inspectors were trained on identifying spills and illicit discharges and the proper procedures for reporting and documenting.
- iv. The local jurisdictions have also coordinated with the fire departments and DOE for emergency spill response of hazardous materials.

VI. Recordkeeping

Each jurisdiction maintains records of all field assessments, complaints of spills, suspected illicit discharges and illicit connections, and investigations using the procedures outlined in the IDDE Response Plan. Records are kept on training that was offered and a list of staff members who attended.

Timelines listed in this section of the permit:

- *Revise ordinance or resolution, if necessary to meet the requirements of the permit, no later than February 2, 2019.*
- *Field assessing at least 40% of the MS4 no later than December 31, 2018.*
- *Field assessing on average 12% of the MS4 each year thereafter.*

Appendix:

Appendix A IDDE Response Procedure

Wenatchee Valley Stormwater Management Program
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Appendix A: IDDE Response Procedure