



## **Illicit Discharge Detection and Elimination (IDDE) Plan**

Prepared with the assistance of



***Acronyms***

***BMP*** – Best Management Practice.

***CWA*** – Clean Water Act.

***CWP*** – Center for Watershed Protection.

***EPA***- U.S. Environmental Protection Agency.

***IDDE*** – Illicit Discharge Detection and Elimination.

***ISTS*** – Individual Sewage Treatment System.

***LGU*** – Local Government Unit.

***MCM*** – Minimum Control Measure.

***MPCA*** – Minnesota Pollution Control Agency.

***MS4*** – Municipal Separate Storm Sewer System.

***NPDES*** – National Pollutant Discharge Elimination System.

### **1. *Illicit Discharge Detection***

Observed or complaint driven illicit discharges will be investigated to determine the source and nature of the discharge.

### **2. *Identify Illicit Discharges***

- (a) Inspection Procedures: The City of Oak Grove will inspect for illicit discharges during their routine inspections of their storm sewer system outfalls. Oak Grove inspects 20% of the MS4 outfalls yearly. Illicit discharge inspections will be scheduled during dry weather periods.
- (b) Areas within the City's jurisdiction that are brought forward due to a complaint will be re-inspected within 48 hours.
- (c) Typical investigation will be done to review a discharge for potential pollutants.

### **3. *Locating the Source***

When a problem area or discharge is found, additional efforts are necessary to determine the source of the discharge. Methods that can find the source of illicit discharges include:

- Inspections by trained City Staff;
- Water sampling and testing;
- Dye-testing buildings in the area of concern;
- Smoke testing buildings;
- Tracing the discharge upstream in the storm sewer;
- Using video in the case of storm sewer pipe.

### **4. *Locating Priority Areas***

Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land uses associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. Based on this evaluation, the permittee shall conduct additional illicit discharge inspections in those areas identified as having a higher likelihood for illicit discharges.

#### **4.1 *Developing Priority Areas***

Identifying priority areas is vital to the development of an IDDE program. This process can be broken down into three fundamental steps:

1. Use all available information to identify where illicit discharges may be found in the community.

2. Conduct dry weather field screenings to locate non-stormwater discharges.
3. Conduct water quality sampling and analysis to determine if non-stormwater discharges are present.

#### **4.2 Locating Priority Areas**

The first step in locating priority areas is to identify areas that have a high potential for illicit discharges within your community. These can be broken down into a list of commonly high probability locations where illicit discharges may be or are likely to occur.

1. Locations where there have been repeated problems in the past. This includes locations with known water quality data, as well as locations where numerous complaints have been received. These areas should be known by community officials as well as other agencies that collaborate on specific problem areas.
2. Using existing information to assess where illicit discharges may be found and what waterbodies are particularly sensitive (e.g. drinking water sources, areas containing unique biodiversity, and swimming areas).
3. Older areas of a community may indicate possible locations where there will be illicit discharges detected. These locations may have a higher percentage of illegal connections and/or have deteriorating sewer lines leading to infiltration problems from the older infrastructure found in that area.
4. The commercial and/or industrial areas of the community will tend to have a higher percentage of illicit discharges as well. Historically, these locations have significant numbers of illegal connections and have discharges with a high potential to affect water quality.
5. Stormwater outfalls and structural pollution control devices should be inspected for illicit discharges during the normal inspection period for these structures/facilities.
6. Areas with storage of large quantities of materials that could result in a spill or areas with many storage vessels of hazardous solids or liquids.

#### **4.2 Current Priority Areas**

The City has identified the following Priority Areas.

- Tamarack Industrial Park
- CSAH 9/22 Commercial Area
- West Lake George

#### ***5. Illicit Discharge Elimination***

Depending on the situation, the response to the illicit discharge will vary. Staff will follow the Enforcement Response Procedure outlined on the attached ERP form and below. In all cases, findings related to the illicit discharge should be documented. In all cases of petroleum spills larger than 5 gallons, the Minnesota State Duty Officer (1-800-422-0798 or 651-649-5451) shall be contact by the responsible party for the spill:

### One Time Discharges

- Verbal / written notification to the identified source and explain to them that the discharge is illegal.
- Determine the severity of the problem and whether or not legal follow up is necessary
- Ensure there is no additional risk to the storm sewer system or the environment
- Immediately notify the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061
- Notify other agencies as appropriate. These could include but are not limited to the MPCA or the DNR
- Document all information

### Sanitary Sewer Leaks

- Review the extent and nature of the problem
  - Repair the infrastructure as soon as possible
- Ensure there is no additional risk to the storm sewer system or the environment
- Immediately notify the Minnesota Department of Public Safety Duty Officer at 1-800-422-0798 (toll free) or 651-649-5451 (Metro area), if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061
- Notify other agencies as appropriate. These could include but are not limited to the MPCA or the DNR
- Document all information

### Non – Point Source Pollution

- Determine if the problem can reasonably be corrected
- Document the situation with photographs
- Perform / schedule corrective action as necessary
- Document all information

## **6. Responsible Parties For Detection**

Responsibilities for illicit discharge detection and typical inspection type are assigned as stated in the table below:

Public Works/City Engineer	Inspections
City Engineer	Source Determination
Fire Department	Emergency Spill Response

## ***7. Documentation of Actions Taken***

Actions relating to illicit discharge detection will be kept on file by the City of Oak Grove. Documentation shall include, at a minimum, the following:

- (a) Name of the person responsible for violating the City terms and conditions
- (b) Dates and locations of the observed violations
- (c) Description of the violations, including references to relevant Regulatory Mechanisms
- (d) Corrective actions including completion schedule by City
- (e) Dates and types of enforcement used to compel compliance (e.g., written notice, citation, stop work order, withholding of local authorizations, etc.)
- (f) Referrals to any other regulatory organizations
- (g) Dates violations are resolved

## ***8. Illicit Discharge Management***

Illicit discharges that fall outside normal City responsibilities will be directed to Anoka County, MNPCA, or the appropriate LGU if discharging to other MS4's.

## ***9. Enforcement and Coordination***

Oak Grove will notify other local, state, and federal agencies of an illicit discharge. Oak Grove will help ensure all agencies collaborate so enforcement efforts are coordinated.