ILLICIT DISCHARGE DETECTION & ELIMINATION

MINIMUM MEASURE
# Subcommittee members

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
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<tbody>
<tr>
<td>David Phlegar</td>
<td>City of Greensboro</td>
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<tr>
<td>Scott Bryant</td>
<td>City of Raleigh</td>
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<tr>
<td>Keith Huff</td>
<td>City of Winston Salem</td>
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<tr>
<td>Daniel Colavito</td>
<td>Town of Holly Springs</td>
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<tr>
<td>Mike Randall</td>
<td>NC DEQ</td>
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<tr>
<td>Beth McLaughlin</td>
<td>McLaughlin Consulting/AMEC</td>
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<tr>
<td>Michael Layne</td>
<td>City of Burlington</td>
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Getting here...

- Many of face to face meetings
- Reviewed the IDDE section of the permits
- Segregated MEP vs Sustainability questions
- Hurdle:
  - *No template to follow...winging it.*
Background

- Reviewed NC NPDES permits
- Reviewed EPA guidance materials
- Reviewed each community’s program
**BMP1:**
Implement a Program to Detect & Eliminate Illicit Discharges

**ILlicit Discharge Detection and Elimination Program (IDDE)**

**NPDES Permit – Part II Section D (2) (j)**

**Requirement:** Enforcement of the IDDE ordinance

**Measurable Goal:** The program shall include measures to enforce the IDDE ordinance and eliminates illicit discharges.

**MEP**

1. Does the LOCAL GOVERNMENT have a legal mandate to reduce illicit discharges?
2. Are adequate legal resources available to the LOCAL GOVERNMENT to support its efforts to reduce illicit discharges?
3. Are the resources of the LOCAL GOVERNMENT sufficient for the reduction of illicit discharges?
4. Has the LOCAL GOVERNMENT developed a realistic budget to reduce illicit discharges?
5. Are the actions of the LOCAL GOVERNMENT consistent with the IDDE ordinance?
6. Has the LOCAL GOVERNMENT been issued a NPDES permit or other permit allowing the discharge of illicit waste?

**Sustainability**

1. Has the LOCAL GOVERNMENT completed an assessment of the illicit discharges?
   a. If yes, has the LOCAL GOVERNMENT identified and documented all illicit discharges?
   b. If yes, has the LOCAL GOVERNMENT conducted and documented all necessary analyses to identify and document all illicit discharges?
   c. If yes, has the LOCAL GOVERNMENT developed and implemented an action plan to address the identified illicit discharges?

2. Has the LOCAL GOVERNMENT developed and implemented an action plan with deadlines to address the areas that need to be strengthened?
   a. If yes, has the LOCAL GOVERNMENT identified the root causes of any findings and/or recommendations?
   b. If yes, has the LOCAL GOVERNMENT developed and implemented a plan to address the identified modifications and improvements?
   c. If yes, has the LOCAL GOVERNMENT documented the changes to programs or practices?
   d. If yes, has the LOCAL GOVERNMENT identified deadlines to implement changes to the programs or practices?

3. Has the LOCAL GOVERNMENT trained staff on the changes and/or revised SOPs?
   a. If yes, has the LOCAL GOVERNMENT trained staff on the changes and/or revised SOPs?
   b. If yes, has the LOCAL GOVERNMENT educated staff on the changes and/or revised SOPs?
   c. If yes, has the LOCAL GOVERNMENT conducted a post-implementation review to evaluate the effectiveness of the changes and/or revised SOPs?

**Sustainability Questions Applicable to the Overall IDDE Program**

1. Is the organization committed to the Illicit Discharge Detection and Elimination Program, i.e., provides adequate resources and supports program?
2. Has the LOCAL GOVERNMENT engaged & collaborated with stakeholders?
   a. If yes, does the LOCAL GOVERNMENT coordinate with other local governments, departments, or staff, State, or County organizations to identify and eliminating illicit discharges, including cross training, meetings, memos, etc.?
   b. If yes, does the LOCAL GOVERNMENT coordinate with other local governments, departments, or staff, State, or County organizations to eliminate cross connections between sanitary and storm sewers?
   c. If yes, does the LOCAL GOVERNMENT coordinate with the County Health Department to ensure proper operation and maintenance of on-site wastewater treatment systems for domestic wastewater?
   d. If yes, does the LOCAL GOVERNMENT collaborate with organizations such as APWA, SWANC, etc. as well as other LOCAL GOVERNMENTS, and other stakeholders to strengthen their IDDE Program?

3. Has the LOCAL GOVERNMENT completed an assessment of the Illicit Discharge Detection and Elimination Program?
   a. If yes, has the LOCAL GOVERNMENT conducted and documented annual reviews of the Illicit Discharge Detection and Elimination Program including any SOPs, policies and/or written plans?
   b. If yes, has the LOCAL GOVERNMENT maintain a written explanation of how the LOCAL GOVERNMENT will evaluate the success of their Illicit Discharge Detection and Elimination Program?
   c. If yes, has the LOCAL GOVERNMENT identified recommendations to strengthen the program?

4. Has the LOCAL GOVERNMENT developed and implemented an action plan with deadlines to address the areas that need to be strengthened?
   a. If yes, has the LOCAL GOVERNMENT identified the root causes of any findings and/or recommendations?
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BMP1: Implement a Program to Detect & Eliminate Illicit Discharges

**Measureable Goal:** Maintain a written IDDE Program...

**Minimum criteria (MEP):**

- Is there a written program?
- Does it include assessment and evaluation?
- Does it document program updates?
- Does it address non-stormwater discharges or flows?
BMP1: Implement a Program to Detect & Eliminate Illicit Discharges

Measureable Goal: Maintain a written IDDE Program...

Sustainability criteria:
Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs?

- If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify **when it was last updated**?
- If yes, do the standard operating procedures, policies, and written programs specify **what needs to happen, who needs to do it, when it needs to get done**? Are responsibilities and assignments documented?
- If yes, has the LOCAL GOVERNMENT **properly implemented** standard operating procedures, written programs, checklist, policies, etc.?
- If yes, does the local government **maintain a table** that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
- If yes, are **annual reviews** of standard operating procedures, policies, and written programs conducted and documented?
- If yes, are standard operating procedures, policies, and written programs **revised as needed**?
- If yes, are there written procedures to **coordinate efforts** to eliminate illicit discharge and cross connections?
- If yes, are there written procedures to **maintain** the sanitary sewer system?
BMP 2: Maintain a current storm sewer system map

Measureable Goal: Maintain a current storm sewer system map showing major outfalls and receiving stream.

Minimum criteria (MEP):

■ Does the LOCAL GOVERNMENT maintain a current storm sewer system map showing major outfalls and receiving stream?

■ Is there an up-to-date Storm Sewer System Map of Major Outfalls?

■ Does the storm sewer map identify the names and location of all receiving waters?
BMP 2:
Maintain a current storm sewer system map

**Measureable Goal:** Maintain a current storm sewer system map showing major outfalls and receiving stream.

**Sustainability Criteria:**
Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs for their IDDE mapping?

- If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
- If yes, do the standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when it needs to get done?
- If yes, are responsibilities and assignments documented?
- If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
- If yes, does the LOCAL GOVERNMENT describe the sources of information for the maps, and how the permittee plans to verify the outfall locations?
- If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
- If yes, is each mapped outfall given an individual identifier, which may be noted on the map and identify priority areas identify priority areas and field screening stations?
- If yes, does the LOCAL GOVERNMENT have a written SOP in place to regularly update the map?
- If yes, does stormwater map include drainage areas, monitoring stations, stormwater pipes, inlets and other structures (e.g., detention ponds and other structural BMPs)?
- If yes, is there a process to identify and add new outfalls to the Storm Sewer System Map?
- If yes, are annual reviews of standard operating procedures, policies, and written programs conducted and documented?
- If yes, are standard operating procedures, policies, and written programs revised as needed?
**BMP 3:**
Track and document illicit discharge investigations

**Measureable Goal:** For each case the permittee shall track and document 1) the date(s) the illicit discharge was observed; 2) the results of the investigation; 3) any follow-up of the investigation; and 4) the date the investigation was closed.

**Minimum criteria (MEP):**

- For each case does the local government track and document the date(s) the illicit discharge was observed?
- For each case does the local government track and document the results of the investigation?
- For each case does the local government track and document any follow-up of the investigation?
- For each case does the local government track and document the date the investigation was closed?
BMP 3: Track and document illicit discharge investigations

**Measureable Goal:** The Local Government shall implement an employee training program for employees involved in implementing pollution prevention and good housekeeping practices.

**Sustainability Criteria:**
Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to track and document illicit discharge investigations?

- If yes, does the LOCAL GOVERNMENT **investigate** and mitigate any reported illicit discharge?
- If yes, does the LOCAL GOVERNMENT **identify** most prevalent sources and pollutants in the illicit discharge data, and where are these illicit discharges occurring?
- If yes, does the LOCAL GOVERNMENT **track** illicit connections reported by employees or businesses?
- If yes, does the LOCAL GOVERNMENT **track** the number and resolution of IDs?
- If yes, does the LOCAL GOVERNMENT **track** where illicit discharges occurring?
- If yes, does each standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when they need to get it done, where it is to be done?
**BMP 3:**
Track and document illicit discharge investigations

**Measureable Goal:** The Local Government shall implement an employee training program for employees involved in implementing pollution prevention and good housekeeping practices.

**Sustainability Criteria: (cont’d)**

Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to track and document illicit discharge investigations?

- If yes, for inspections and dry weather flow investigations, does the LOCAL GOVERNMENT record general information such as time since last rain, quantity of last rain, site descriptions and visual observations?
- If yes, does the LOCAL GOVERNMENT track outfalls or screening points that were visually screened?
- If yes, does the LOCAL GOVERNMENT track how many samples were collected and analyzed?
- If yes, does the LOCAL GOVERNMENT track parameters?
- If yes, does the LOCAL GOVERNMENT maintain collected information in a georeferenced database?
- If yes, are dry weather tests/inspections tracked?
- If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to strengthen their program to track and document IDDE?
Other BMP’s:

- Maintain adequate legal authorities
- Implement a program to detect dry weather flows.
- Investigate illicit discharges
- Track and document illicit discharge investigations
- Provide Employee Training
- Provide Public Education
- Provide a public reporting mechanism
- Enforcement of the IDDE ordinance
Overall IDDE Sustainability:

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Questions?