



Illicit Discharge Detection and Elimination Program & Procedures

MARCH 2017



Program Overview

This serves as a guidance document for the City of Plymouth to help fulfill the requirements of the Minnesota Pollution Control Agency's *General Permit Authorization to Discharge Stormwater Associated with Small MS4's Under the NPDES/SDS Permit Program, Permit No. MNR040000 (Part III.D.3)*.

The primary focus of this Illicit Discharge Detection and Elimination (IDDE) document is to help city staff identify, investigate, respond and eliminate any discharge to the municipal separate storm sewer system (MS4) that is not composed entirely of stormwater.

Plymouth City Code Sections 725 and 740 are the regulatory mechanisms the City of Plymouth uses to regulate and prohibit the discharge of non-stormwater into ponds, wetlands, streams and lakes. Additionally, the City of Plymouth's Storm Water Pollution Prevention Program (SWPPP) has IDDE components integrated throughout the entire document. A list of sections included in the SWPPP relating to IDDE is below.

- 3a-1 – Illicit Discharge Detection and Elimination – Storm Sewer System Map
- 3b-1 – Illicit Discharge Detection and Elimination – Regulatory Control Program
- 3c-1 – Illicit Discharge Detection and Elimination – Illicit Discharge Detection and Elimination Plan
- 3d-1 – Illicit Discharge Detection and Elimination – Public and Employee Illicit Discharge Information Program
- 3e-1 – Illicit Discharge Detection and Elimination – Identification of Non-Stormwater Discharges and Flows
- 6b-2 – Pollution Prevention/Good Housekeeping – Annual Inspection of All Structural Pollution Control Devices
- 6b-3 – Pollution Prevention/Good Housekeeping – Inspection of a Minimum of 20% of the MS4 Outfalls, Sediment Basins and Ponds Each Year on a Rotating Basis
- 6b-4 – Pollution Prevention/Good Housekeeping – Quarterly Inspection of All Exposed Stockpile, Storage, and Material Handling Areas
- 6b-6 – Pollution Prevention/Good Housekeeping – Record Reporting and Retention of all Inspection and Responses to Inspection
- 6c-1 – Pollution Prevention/Good Housekeeping – Monitoring

To view an individual section of the SWPPP document listed above, contact the Water Resources Division of the Public Works Department (763-509-5500).

Purpose

Whether at home or at work, all individuals who live or work in the city can help to prevent and identify illicit discharges as they happen. The storm sewer system is designed to convey surface water runoff from natural precipitation. Any material entering into the storm sewer other than stormwater is considered an illicit discharge and is prohibited from entering the system. Water Resources staff has developed education and training materials that are applicable to an employees job responsibilities to help further educate staff on illicit discharge and water quality issues.

It is important that any suspected illicit discharges are reported to the proper parties right away, as time is of the essence when it comes to protecting water quality from harmful chemicals, sewage or other illicit discharges. The responding party will vary depending on the location of the IDDE, its severity and quantity and the time of day when it's observed. Examples of illicit discharges and who to contact is listed in [Table 1](#). Additionally, examples of what to do with small, medium and large spills are listed in the [Procedure](#) sections. A flow chart has been created for illicit discharge response and is included at the end of this document.

The list in [Table 1](#) outlines common illicit discharge sources and which staff department is responsible for addressing this issue.

Table 1

Illicit Discharge Sources	Responding Entities
Concrete Washout	Water Resources Division 763-509-5527
Dumping in Storm Drains and Drainage Ways	Water Resources Division 763-509-5500
Erosion and Sediment Control	Water Resources Division 763-509-5527
Vehicle Accidents	Emergency Services 911 Police Department 763-525-6210 Fire Department 763-509-5120
Dumping on Park Land	Park and Recreation 763-509-5200
Garbage and Recycling	Solid Waste Division 763-509-5052
Solid & Hazardous Waste	Solid Waste Division 763-509-5052
Industrial NPDES Stormwater or SDS Permitted Sites	See Table 2
Internal/Outdoor Plumbing Cross Connections	Public Works - Maintenance 763-509-5950
Sanitary Sewer Blockage or Overflows	Public Works - Maintenance 763-509-5950
Yard Waste Leaves and Grass Clippings	Water Resources Division 763-509-5500

**** The responsible party for a spill also needs to contact the State Duty Officer at 651-649-5451**

Not all discharges into the storm sewer system are considered illicit discharges. The list below contains all of the exemptions outlined in City Code Sections 725.14 & 740.

- Water Line Flushing
- Landscape Irrigation
- Diverted Stream Flows
- Rising Ground Waters
- Foundation Drains
- Uncontaminated Pumped Ground Water
- Discharges from Potable Water Sources
- Street Wash Water
- Air Conditioning Condensation
- Irrigation Water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Flows from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Uncontaminated Ground Water Infiltration

Inspections

The City of Plymouth proactively inspects at least 20% of the Water Quality Ponds, Wetland and outfalls each year. Additionally, structural BMPs designed to treat storm water runoff are inspected annually and stockpiles and material storage and handling areas are inspected quarterly. Illicit Discharge Detection and Elimination should be incorporated into all inspection and maintenance activities as required by the Minnesota Pollution Control Agency's - *Permit No. MNRO40000 (Part IIID.6.e)*. When feasible, IDDE inspections should be conducted during dry-weather conditions (periods of 72 hours or more of no precipitation).

When pollutants are detected, whether it be during routine inspections or in response to a complaint, the City of Plymouth is responsible for identifying and stopping the source of pollution. The responsible party for the violation shall be responsible for the clean up of any illicit discharges into the storm sewer system. The procedure below shall be followed in all cases.

Procedure

The City has an Illicit Discharge phone number (763-509-5950) for the public to report suspected illicit discharges. When a complaint is received, the Water Resources or Utilities Division will inspect the complaint and determine the appropriate action to take. The goal is to respond to an illicit discharge report in a timely manner.

City of Plymouth field staff are trained annually on how to spot and report possible illicit discharges. The responsible City staff as outlined in [Table 1](#) will investigate all illicit discharge incidents reported to them. If the type of spill encountered isn't outlined in [Table 1](#), please contact the Public Works Department at 763-509-5950. The following procedure should be followed when responding to an illicit discharge complaint.

1) Receive Report

- Collect information
 - Brief description of the issue
 - Location of the suspicious discharge or connection
 - Address & Exact location of discharge
 - Description of the discharge
 - Contact information of complainant
 - All reports to remain anonymous, for follow up purposes only.
 - **ALL INFORMATION NEEDS TO BE ENTERED INTO MS4FRONT**
- Responsible City Staff Department must respond as soon as possible to the call.

2) Identification

The responsible staff as listed in [Table 1](#), must visit the site of the complaint as quickly as possible and attempt to identify the illicit discharge. Methods of identification shall include, but not be limited to:

- Visual observation
- Sampling of material
 - If the material cannot be identified, a sample should be taken for testing at a local laboratory.
- If staff feels the discharge poses a threat to life or property, 911 will be immediately called.
 - Examples: explosive liquids or other chemicals draining into the storm sewer
- Classify the spills as small, medium or large as identified below under **Spill Types** category in item number 4 and notify the appropriate action.

3) Investigation

Staff should attempt to trace the illicit discharge to its source. Methods will vary based on the type, location and source of the discharge. In all cases, the use of Geographic Information System (GIS) Mapping will be essential. The following types of investigative techniques should be used as applicable.

- Trace the “trail” of the discharge upstream to its source
- Utilize CCTV to find illicit connections into storm sewer pipes
- Dye testing (to verify the source)
- Sample upstream and downstream of the discharge

In all cases, documentation is critical.

4) Elimination

Depending on the situation, the response to the illicit discharge will vary. Examples of small, medium and large spill responses are below. In all cases, documentation of the illicit discharge should be entered into MS4Front.

Spill Types

Small Spills:

Any spill where the major dimension is less than 18 inches in diameter. Small spills are generally handled by internal personnel and usually do not require an emergency response by police or fire department HAZMAT teams.

- Quickly control the spill by stopping or securing the spill source
- Put spill material and absorbents in secure containers if any are available
- Use dry cleanup methods and NEVER wash spills down the storm drain, or onto hard surfaces
- Both the spilled material and the absorbent may be considered hazardous waste and must be disposed of in compliance with state and federal environmental regulations

Medium Spills:

Spills where the major dimension exceeds 18 inches, but less than 6 feet. Outside emergency response personnel (police and fire department HAZMAT team) should usually be called for medium spills. Common sense will dictate when it is necessary to call them.

- Immediately try to help contain the spill at its source by simple measures only. Once you have made a quick attempt to contain the spill, or once you have quickly determined you cannot take any brief containment measures, leave the area and alert Emergency Responders at 911. Give the operator accurate information as to the location, chemical, and estimated amount of the spill.
- Evaluate the area outside the spill.
- If emergency responders evacuate the spill area, follow their instructions in leaving the area.
- After emergency responders have contained the spill, be prepared to assist them with any other information that may be necessary.
- Contact the Minnesota State Duty Officer to report and file the correct paperwork. It is the responsibility of the spiller to inform both his/her supervisor and the emergency responders as to what caused the spill. The response for large spills is similar to the procedures for medium spills, except that the exposure danger is greater.

Large Spills:

Any spill involving flammable liquid where the major dimension exceeds 6 feet in diameter and any spill that is flowing, where the source of the spill has not been contained or flow has not been stopped.

- Leave the area and notify Emergency Responders (911). Give the operator the spill location, chemical spilled and approximate amount
- Only emergency response personnel, in accordance with their own established procedures, should handle spills greater than 6 feet in any dimension or that are continuous. Remember, once the emergency responders or HAZMAT team is at the site clearing up spills or putting out fires, the area is under their control and no one may re-enter the area until the responder in charge gives the all clear.

In all cases, the Minnesota State Duty Officer (651-649-5451) shall be contacted 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
 - Notify other agencies as appropriate. These could include; MPCA, DNR and the Duty Officer.
 - Enter all information into MS4Front
- Sanitary Sewer Leaks
 - Review the extent and nature of the problem
 - Repair infrastructure as soon as possible
 - Ensure there is no additional risk to the storm sewer system or the environment
 - Notify other agencies as appropriate. These could include; MPCA, DNR and the Duty Officer.
 - Enter all information into MS4Front
- Non-Point Source Pollution
 - Determine if the problem can reasonably be corrected
 - Document the situation with photographs
 - Perform/schedule corrective action as necessary
 - Enter all information into MS4Front

5) Enforcement

- A violation letter is sent to the violating party listing corrected actions that need to take place
- Administrative Penalty
- City hires a contractor to clean up the site and charges the Owner for the costs.

6) Documentation and Tracking

All Illicit Discharge incidents should be documented and tracked until the problem has been completely resolved. All information pertinent to the illicit discharge shall be kept in MS4Front.

MPCA – Active Industrial Stormwater General Permit Sites

The following is a list of the Minnesota Pollution Control Agency’s Industrial Stormwater (ISW) General Permit holders within the City of Plymouth’s municipal boundary. Plymouth is not responsible for inspecting these facilities as they are handled through the ISW General Permit Program. The list below is for informational purposes only. All Industrial Stormwater Permit related questions should be referred to the Minnesota Pollution Control Agency.

Table 2: This list was last updated 3/10/2017. The list will be updated at least once annually.

Facility Name	MPCA Permit No.	Owner Name	Address	City	State	Zip
AaCron Inc.	MNR0539SP	AaCron Inc.	2705 Cheshire Lane N	Plymouth	MN	55447
Aero Systems Engineering Inc.	MNR053B3K	ASE Holdings	13825 Schmidt Lake Road	Plymouth	MN	55446
Buhler Inc.	MNR0538T3	Buhler Inc.	13105 12 th Ave N	Plymouth	MN	55441
First Student Inc. – 11398	MNR0538RM	First Student Inc.	15625 32 nd Ave N	Plymouth	MN	55447
Garlock Equipment Co	MNR0539S2	Garlock Equipment Co	2601 Niagara Lane N	Plymouth	MN	55447
Hamon Deltak	MNR053C9P	Hamon Deltak Inc	13330 12 th Ave N	Plymouth	MN	55441
Minntech Corp – Plymouth	MNR0539HC	Medivators	14905 28 th Ave N	Plymouth	MN	55447
Rational Energies HC – Inc.	MNR0538QM	Rational Energies Inc.	14920 27 th Ave N	Plymouth	MN	55447

