

Illicit Discharge Detection and Elimination – MCM #3

Part II.C.7.c

Responsible Person

Identify the responsible person(s) for implementing this MCM. If there is more than one person or department responsible for implementation of this MCM, please discuss.

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17.b. Title: Stormwater Specialist
17.c. Department: Environmental Health and Safety
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17.a. Name: Gayle Fratto
17.b. Title: Assistant Director
17.c. Department: Environmental Health and Safety
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17.g. Is another entity sharing responsibility for the MCM? If so, who?
No.

Control Objective and BMPs

17.h. State your overall objective for this MCM.
Continue to update, maintain and implement the existing Illicit Discharge Detection and Elimination (IDDE) program to prevent and clean-up spills, detect and remove non- stormwater discharges, such as but not limited to illicit connections, or illegal dumping into the jurisdictional MS4 boundary owned by WVU.

17.i. State and describe your BMPs. Indicate if any BMPs are part of your existing program. Each BMP was part of the existing program. Each BMPs has redefined milestones and measureable goals to better achieve implementation. Table 3.1 describes the actions WVU will carry out to implement its IDDE Program.

Table 3.1 Illicit Discharge Detection and Elimination BMPs.

ID #	BMP (section references point to §Part II.C.7.c of the General Permit)	Measurable Goals and Milestones	Months After SWMP Approval
3-1	MS4 Mapping. Maintain a map of the MS4 jurisdiction that includes outfalls, receiving waters, structural BMPs, stormwater conveyances, combined sewers, and geographic areas that discharge to the MS4 and other related appurtenances.	<p>Print out a map(s) of each watershed.</p> <p><i>Milestone – Revise the current schedule for visual inspection of outfalls to assist in the detection and elimination of illicit discharges.</i></p> <p>Update MS4 map(s) after field inspection or new construction is completed and update as necessary.</p>	<p>Annually</p> <p>1</p> <p>Annually</p>
3-2	Plan of Action. Prohibit or eliminate non-stormwater discharges, spills, illicit connections, and illegal dumping into the MS4.	<p>Review and update the IDDE Plan of Action, including standards by which non-prohibited and conditionally permitted discharges may discharge into the MS4 (§3.b.ii).</p> <p>Incorporate elements of the IDDE Plan of Action into the Design Guidelines and Construction Standards where applicable.</p> <p>Review the Plan of Action and update as necessary.</p>	<p>3</p> <p>9</p> <p>Annually</p>
3-3	Inspection Procedures. Conduct field assessment activities, including visual inspection of outfalls, characterization of the nature of illicit discharges, tracing the source of illicit discharges, and removal of the source of the discharge.	<p>Update the IDDE field assessment procedures consistent with the standards in the new General Permit.</p> <p>Review the field assessment procedures and update as necessary.</p> <p><i>Milestone – Revise the inspection schedule of outfalls to assist in the detection and elimination of illicit discharges (BMP3-1).</i></p>	<p>6</p> <p>Annually</p> <p>3</p>
3-4	Staff Training. Train staff and other employees on ways to identify and report non-stormwater discharges, spills, illicit connections, and illegal dumping (BMP 1-1).	<p>Provide refresher training.</p> <p><i>Milestone – Obtain and compile training materials to use for training staff about the IDDE Program.</i></p> <p><i>Milestone - Identify the staff and their roles for participating in the IDDE Program.</i></p> <p>Revise the schedule for providing initial and refresher training.</p>	<p>Annually</p> <p>3</p> <p>4</p> <p>6</p>
3-5	Pollution Control. Document and track non-stormwater discharges, spills, illicit connections, and illegal dumping through reports related to conditions not allowable for water quality standards.	<p>Provide a report for each investigation, which will include finding of facts and a corrective action plan.</p> <p><i>Milestone – Investigate complaints, spills or other illicit discharges from, but not limited to fuel tanks, vehicle storage and maintenance areas, sanitary sewers, or material storage areas, (i.e. herbicide/fertilizer, used oil, trash dumpsters, road salt) that have the potential to impact water resources.</i></p>	<p>15 days after occurrence</p> <p>24 hrs after notification</p>

MCM Components

Part II.C.7.c.7

17.j. Do you have a current map of your municipal storm sewer system?

Yes

Do your map components include/do you plan to include:

Part II.C.7.c.6

17.k. All known storm sewer outfalls?

Yes, WVU has currently identified 78 outfalls and will update or remove outfalls as construction is performed with the addition or elimination of outfalls.

17.l. Receiving waters?

Yes, there are 7 receiving streams that WVU discharges to.

17.m. Structural BMP's owned, operated or maintained by the permittee?

Yes, WVU will continue to update the map with all of its structural BMPs as construction is performed with the addition, modification or elimination of BMPs.

17.n. The location and type of all other stormwater conveyances located within the boundaries of the permittees MS4 watershed?

Yes

17.o. Updating the known connections to the municipal separate storm sewer authorized after July 22, 2009?

Yes, WVU will include this information as projects are completed.

17.p. Geographic areas that discharge stormwater into the permittee's MS4, which may not be located within the municipal boundary?

Yes

Tip: Your map should show new outfalls, structural stormwater BMPs owned by the MS4, other stormwater conveyances, and other pertinent information. You must update your map on an annual basis.

Part II.C.7.c.11

17.q. Do you have an IDDE Ordinance?

No, as a non- municipal MS4, WVU currently does not have the authority to develop, enact or enforce an IDDE ordinance. WVU will focus on implementation of (BMP 3-5) of this MCM, including the development and implementation of an IDDE Plan of Action to prohibit illicit discharges (BMP 3-2).

Part II.C.7.c.10

17.r. Describe your Ordinance review and update procedure, including milestones of IDDE Ordinance review.

No, See SRA §17.q

Does your IDDE Ordinance prohibit the following:

Part II.C.7.c.14

17.s. Discharges from hyperchlorinated water line flushing? Yes. If not, how are these discharges handled when they occur?

17.t. Lawn watering and other irrigation runoff? Yes. If not, have you addressed lawn watering in your public education and outreach activities?

17.u. Street, parking lot, and sidewalk wash water, and external building wash down? Yes. If not, have you addressed these types of runoff in your public education and outreach activities?

WVU will address each of these conditionally permitted discharges in its IDDE Plan of Action (BMP 3-2). The Plan of Action will include a program describing how to minimize or eliminate the pollutants associated with these activities through targeted education efforts (BMP 1-1) and the Good Housekeeping Plan of Action (BMP 6-1 and BMP 6-3).

Part II.C.7.c.17

17.v. Does your IDDE Ordinance include escalating enforcement procedures and actions?

No, See SRA §17.q

Part II.C.7.c.16

17.w. Briefly describe your enforcement strategy.

See SRA §17.q

Tip: The IDDE Ordinance shall be reviewed on an annual basis. The Ordinance shall be reviewed to ensure that it contains the necessary required information that the 2009 small MS4 general permit requires.

Your Ordinance is required to prohibit and eliminate non stormwater discharges, illegal discharges, and/or dumping into the storm sewer system, and any necessary procedures for evaluation, assessment, investigation and enforcement to prevent polluted stormwater discharges from entering local streams, lakes or rivers. Except for newly permitted entities, MS4's should already have this Ordinance in place.

Part II.C.7.c.21

17.x. Describe your field assessment activities, including how many assessments you plan to conduct each year.

WVU will utilize the procedures defined in (BMP 3-3) to conduct a field assessment for a minimum of 25% of its associated outfalls per year and will evaluate each outfall a minimum of once per permit cycle.

Part II.C.7.c.18

17.y. Describe how you will locate “priority areas”.

WVU will prioritize areas for illicit discharge assessment by considering three factors:

1. Areas that have had previous issues or a history of associated problems. WVU will review past illicit discharges to determine if previous corrective action measures are functional.
2. Areas that have had complaints in the past. WVU will review its past history of complaints or incidents of illicit discharge to help determine what regions of campus or outfall have had illicit discharges before. Also, by increasing education about the impacts of illicit discharge (BMP 1-1) WVU staff will gain a better understanding of where problem areas may lie.
3. Areas with material storage or other industrial activities with spill potential. WVU will consider the location of spillable materials to help prioritize areas for assessment (BMP 6-1 and BMP 6-2). Once WVU develops operation and maintenance programs for each of its facilities, there will be a clearer understanding of the types of pollutant sources that could affect water quality on campus, their location, and their potential for spill.
4. WVU will consider the impaired waters and TMDL implementation sections of the permit for locating priority areas.

Part II.C.7.c.22

17.z. Describe your procedures for characterization of illicit discharges.

WVU will implement (BMPs 3-2 and 3-3) for characterization, tracing, and removing the sources of illicit discharges.

Part II.C.7.c.24

17.aa. Describe your procedures for tracing the source of the discharge.

See SRA §17.z.

Part II.C.7.c.25

17.bb. Describe your procedures for removing the source of the discharge.

See SRA §17.z.

Tip: Each permittee shall continue to assess, update and implement an ongoing program to detect and address non-stormwater discharges, spills, illicit connections and illegal dumping into the MS4.

Part II.C.7.c.27

17.cc. Describe how you will inform public employees, businesses and the general public of hazards associated with illegal discharges and improper disposal of waste.

WVU will employ a series of tools to educate audiences on campus about illegal discharges and improper disposal of waste through the implementation of (BMP 1-1 and BMP 3-4).

Part II.C.7.c.30

17.dd. Describe your plan to training your staff on the identification and reporting of illicit discharges. Include the number of training sessions planned for each year.

WVU will train all staff on the identification and reporting of illicit discharges (BMP 3-4).

Schedule

Part II.C.7.c

17.ee. Describe how and when you will implement each component of program, including dates for interim and full implementation.

See Table 3.1.

Measurable Goals

Part II.C.7.c

17.ff. List and fully describe your Measurable goal(s) for this MCM:

See Table 3.1

Tracking:

Part II.C.7.c.32

17.gg. Describe your procedures for tracking activities related to each component of this MCM.
See SRA §15.p

Evaluation

Part II.B.7

17.hh. Fully explain how you plan to gauge the effectiveness of your IDDE program.

WVU will review data on the IDDE Program and compare results to the measurable goals listed in Table 3.1 and requirements of SRA §14

Tip: The IDDE program evaluation can consist of a data base that contains the information including tracking the number and type of spills, illicit discharges identified, inspections conducted, illicit connections removed, and any feedback received from public education efforts. If you have a hotline, you may also be able to determine trends of awareness to your IDDE program.