

Illicit Discharge Detection & Elimination MS4 Permit Requirements

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This document is intended solely as guidance, and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations, and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

MS4 Program

- Chs. NR 216 and NR 151, Wis. Adm. Code
- Cities, villages, towns, counties, non-traditional
- Storm water management program
- Reduce polluted storm water runoff



DNR: Storm sewer outfall discharging sediment to a stream.





MS4 Permit – IDDE Requirements

- Ordinance or other regulatory mechanism
 - Authority to prevent illicit discharges
 - Identify discharge that are not illicit
 - Establish inspection and enforcement authority
- Field Screening
 - Outfalls
 - 100% of major outfalls at least once during permit term
 - Develop procedure to selecting minor outfalls to screen
 - Visual observation and record observations
 - If flow observed then field chemical analysis to determine if non-stormwater discharge or illicit dumping




MS4 Permit – IDDE Requirements

- Field Screening (cont.)
 - Field screening points shall be located where practical at the furthest point downstream in the system
- DNR has IDDE guidance, which is a summary of information from the Center For Watershed Protection IDDE manual



CORRESPONDENCE/MEMORANDUM

State of Wisconsin

DATE: March 15, 2012
TO: SW Program Staff
FROM: Pam Biersach – Bureau Director 
Bureau of Watershed Management
SUBJECT: Program Guidance #3800-2012-01

Illicit Discharge Detection and Elimination
March 2012
3800-2012-01

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A. Statement of Problem Being Addressed

Limited information is available to assist municipalities with the development of an effective program to determine the presence of illicit discharges from storm sewer system outfalls.

B. Background



MS4 Permit – IDDE Requirements

- IDDE source investigation & elimination procedures:
 - Investigating based on field screening and reported spills
 - Preventing and containing spills
 - Publicize public method for reporting spills
 - NR 706 spill reporting hot line: 1-800-943-0003
 - Detecting and eliminating sanitary cross-connection and leakage into MS4
 - Dye Testing shall include notification to DNR District APM (Susan Graham; Susan.Graham@wisconsin.gov) 7 days in advance unless the specific dye has already been approved then 48 hour advance notice
 - Documenting inspections and actions



MS4 Permit – IDDE Requirements

- Permittee to remove illicit discharge as soon as possible. If more than 30 days to remove or from WPDES permitted discharge, notify DNR to help determine appropriate action
- Notify other MS4 within one day if source originates from their system
- Proposed: Updated IDDE program to be submitted to DNR with the annual report due March 31, 2020

Questions?

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