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DEPARTMENT OF ENVIRONMENTAL PROTECTION



MCM 3: Illicit Discharge Detection and Elimination

Delaware County IDDE Workshop

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Tom Wolf, Governor

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- What is an illicit discharge?
 - Basically, any discharge that is not stormwater or is not listed as an allowable discharge in your MS4 permit is considered an illicit discharge
 - The list of authorized non-stormwater discharges is found on p.3 of the PAG-13 and in Part C.IV.F of the individual permit

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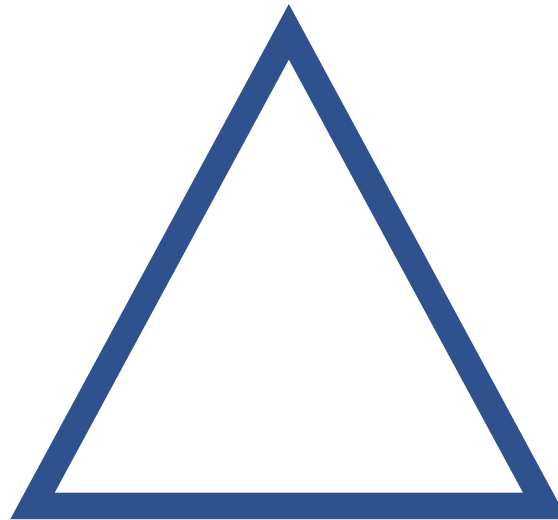
DISCHARGES AUTHORIZED BY THIS GENERAL PERMIT

Except where specifically prohibited under the “Discharges Not Authorized by this General Permit” section, this General Permit authorizes the discharge of stormwater to surface waters from regulated small MS4s. In addition, the following non-stormwater discharges are authorized by this General Permit as long as such discharges do not cause or contribute to pollution as defined in Pennsylvania’s Clean Streams Law:

1. Discharges or flows from firefighting activities.
2. Discharges from potable water sources including water line flushing and fire hydrant flushing, if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).
3. Non-contaminated irrigation water, water from lawn maintenance, landscape drainage and flows from riparian habitats and wetlands.
4. Diverted stream flows and springs.
5. Non-contaminated pumped ground water and water from foundation and footing drains and crawl space pumps.
6. Non-contaminated HVAC condensation and water from geothermal systems.
7. Residential (i.e., not commercial) vehicle wash water where cleaning agents are not utilized.
8. Non-contaminated hydrostatic test water discharges, if such discharges do not contain detectable concentrations of TRC.

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Mapping



Monititoring

Ordinance

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- The IDDE program lays the foundation for the permittee to track and resolve pollution events caused by illicit discharges.
- A good IDDE program includes thorough mapping, outfall screenings and the use of legal authority to enter property and to take other necessary actions to stop illicit discharges
- The IDDE program must be evaluated annually and revised as needed.

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- Mapping



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- Mapping
 - Receiving streams (labelled with names)
 - Outfalls and/or observation points
 - Municipal and urbanized area boundaries
 - Map(s) must depict roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system

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- Mapping
 - Include privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components
 - Maps must be updated and maintained as necessary

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- Outfall Screening



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- Outfall Screening
 - Develop priority areas for screening
 - Screen all outfalls at least once during the permit term
 - Screen outfalls during dry weather (i.e., no events producing a stormwater discharge for more than 48 hours)
 - Use DEP's MS4 Outfall Field Screening Report

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- Outfall Screening
 - What if there's a dry weather discharge?
 - Use your senses – is there a color, odor, floating solids, scum or sheen to the discharge?
 - Further analysis
 - Field screening (pH, temperature, TRC, etc.)
 - Lab screening (fecal coliform, BOD & COD, oil & grease)
 - Use maps to narrow down list of potential dischargers

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- Ordinance
 - Your stormwater management ordinance must be consistent with DEP's 2022 model ordinance.
 - Include provisions for prohibited discharges, right of entry and penalties



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- What if there's an illicit discharge?



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- What if there's an illicit discharge?
 - Your IDDE plan must include mechanisms for tracking and eliminating illicit discharges
 - Thorough mapping can help in tracing the source of illicit discharges
 - Use your authority under your ordinance to stop prohibited discharges
 - Reporting to DEP required

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- Reporting to DEP
 - Immediate Reporting
 - Immediately report emergencies that will negatively impact public health or aquatic life or will cause property damage.
 - Use DEP's emergency telephone number (**800-541-2050**) to report these incidents

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- Reporting to DEP
 - 24-hour reporting: Incidents that *may* endanger human health or the environment
 - Oral report to DEP within 24 hours from the time permittee becomes aware of the incident
 - Follow up with written report within 5 days
 - Send these reports directly to the regional MS4 section

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- Reporting to DEP
 - Annual Report: Instances of minor illicit discharges need only to be listed in your annual report.
 - **Refer to Part A.III.D.4 of both the PAG-13 and individual MS4 permits for complete illicit discharge reporting requirements.**

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- Reporting
 - When to report an emergency



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- Reporting
 - When to report an emergency
 - Overturned tractor trailer with large fuel spill that enters MS4
 - Leaking gas station underground tanks when MS4 involvement occurs
 - Discharge of toxic substance to MS4 that will negatively impact human health or aquatic life (e.g., radioactive material spill into MS4, spill of poisons into MS4)

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- Reporting
 - When to report an emergency
 - Discharge of swimming pool water that causes a fish kill
 - Major sewer line break or sanitary sewer overflow that discharges into MS4*
 - *Does not replace other permit requirements to report SSOs

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- Reporting
 - NOTE: Even if DEP dispatches emergency response personnel to an incident, this does not waive the permittee's responsibilities under MCM 3. You must still take appropriate steps to assure that the illicit discharge is stopped.

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- Reporting
 - When to report within 24-hours



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- Reporting
 - When to report within 24-hours
 - Limited discharge of cleaning agents into MS4 (e.g, runoff from large building power washing)
 - Discharge from commercial swimming pools or large residential pools into MS4 or residential pool discharge that does not impact aquatic life.
 - Discharge from restaurant grease trap
 - Limited discharge of sewage into MS4

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- Reporting
 - When to list in annual report only



MCM 3: IDDE

- Reporting
 - When to list in annual report only
 - Drips from parked vehicles onto municipal roads
 - Fuel or liquid spills from minor passenger vehicle accidents that enter MS4
 - Discharges from smaller residential swimming pools that do not impact aquatic life.
 - Discharge associated with rinsing paint buckets (< 5 gal)
 - Runoff from residential vehicle washing
 - Homeowner sweeping grass clippings into inlet

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- Reporting

- Think in terms of substances discharged and quantities
- When in doubt, call it in!
- DEP 24-hour emergency number: **800-541-2050**



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- Complaints Reported by the Public
 - Members of the public can be your allies in spotting illicit discharges
 - Create a mechanism for the public to notify you of illicit discharges
 - Phone number for reporting illicit discharges
 - Reporting form on municipal website

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- Prevention
 - Use your public education and outreach program to prevent illicit discharges
 - Community events
 - Municipal website
 - Newsletters
 - Social media
 - Municipal employee training
 - Good housekeeping at municipal facilities

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- Additional resources:
 - PA Clean Water Academy (free online courses on MCMs – also count toward MCM 6 requirements!)
 - DEP Website
 - EPA IDD&E Manual



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