

MCM 3 – Standard Operating Procedure - Illicit Discharge Detection and Elimination Inspection Procedures

City of Brainerd

501 Laurel Street, Brainerd, MN 56401

I. PURPOSE

The storm sewer system is designed to convey surface water runoff from natural precipitation. As per the Brainerd City Code 720.06, No person shall discharge or cause to be discharged into the municipal storm drain system or watercourses any materials, including but not limited to pollutants or waters containing pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water, except for the following related discharges:

- Firefighting activities
- Water line flushing
- Landscape and irrigation water
- Diverted stream flows
- Rising groundwater
- Uncontaminated groundwater infiltration
- Uncontaminated pumped groundwater
- Potable groundwater sources
- Foundation footing drains
- Air conditioning condensation
- Individual car washing
- Flows from riparian habitats and wetlands
- De-chlorinated swimming pool water
- Street wash water
- Any other water source not containing pollutants

Illicit discharge detection shall be incorporated into all inspection and maintenance activities as per MPCA MS4 General Permit which includes:

- Annual inspections of structural stormwater BMPs
- At least one inspection of all ponds and outfalls before the end of each permit cycle
- Quarterly inspections of all stockpiles and material storage handling areas and rain gardens

When feasible, inspection should be conducted during dry-weather conditions (periods of 72 hours or more with no precipitation).

Whenever pollutants are detected in the storm sewer system, the City of Brainerd is responsible for identifying the source and removing the material from the system. The City has an Illicit Discharge Detection and Elimination (IDDE) inspection procedure for response to “normal” illicit discharges.

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If the material is potentially hazardous, the fire department's hazardous material team should be contacted immediately.

II. RESPONSIBLE PARTY

The City Engineer or his/her designee is responsible for insuring compliance with the procedure and validating that appropriate records and documentation is in place.

III. PROCEDURE

- Public Works, Engineering, or Natural Resources Staff must respond as soon as possible, but no more than 2 hours after the initial report.
- As quickly as possible, a work order must be created.
- Contact information of the person making the report.
- Location of suspicious material or odor.
- Time and date of observation.
- Description of material.
- All work orders for illicit discharges must be assigned immediately.
- Decide if the enforcement response plan should take effect.

IV. IDENTIFYING

Staff must visit the site as soon as possible and attempt to identify the illicit material. Methods may include:

- Visual observation
- Sampling if material cannot be identified. A sample of material should be taken for testing and for retention. All sampling should be done using sterile sample containers and appropriate sampling methods.

V. INVESTIGATION

Staff should attempt to trace the source of the discharge. Methods that are commonly used include:

- Determine receiving water using base maps/GIS mapping.
- Follow the trail.
- Dye Testing.
- Sampling upstream and downstream.

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VI. ELIMINATION

The response to the illicit discharge will vary by situation.

One-Time Discharge (oil, paint, etc.)

- Verbally speak to the identified source and explain that the discharge is illegal. Determine the severity of the problem and whether use of the ERP (Enforcement Response Plan) is necessary.
- Make sure the system and environment is cleaned.
- Notify all agencies effected, if need be (a report may be necessary depending on the size of the spill and whether it is contained). Contacts required may include MPCA, DNR, and the Duty Officer. Follow up may be required.
- Refer to ERP (Enforcement Response Plan) if necessary.

Sanitary Sewer Leakage (Sewer Cam identified problems in the sewer line, etc.)

- Review the extent of the problem. Repair infrastructure as necessary.
- Verify correction with further testing.
- Notify all agencies effected, if need be (a report may be necessary depending on the size of the spill and whether it is contained). Contacts required may include MPCA, DNR, and the Duty Officer. Follow up may be required.
- Refer to ERP (Enforcement Response Plan) if necessary.

Non-point Source Pollution (animal waste, street run-off, yard run-off)

- Determine if problem can be reasonably corrected.
- Document with photographs.
- Perform Corrective Action.
- Share information with other agencies if appropriate.

V. DOCUMENTING AND TRACKING

All illicit discharge detection and elimination incidents shall be documented and tracked actively until the problem is resolved. The City Engineer or his/her designee will continue to monitor work and clean-up until the work is completed.