City of Cold Spring
IDDE Training

"Illicit Discharge Detection and Elimination" Program

September 14, 2015

Storm Water Quality Storm Water Permit

- KDOW – Kentucky Division of Water
- MS4 – Municipal Separate Storm Sewer System
- NPDES – National Pollutant Discharge Elimination System
- IDDE – Illicit Discharge Detection Elimination
- MCM – Minimum Control Measure
- FEMA – Federal Emergency Management Agency
- CCOEM - Campbell County Office of Emergency Management
- SOP – Standard Operating Procedure

2 Basic Stormwater Inquiries/Complaints

- Water Quality (Required by Federal EPA)
- MS4 Permit (Regulatory)

- SWQMP (storm water quality management plan)
  - Public Education & Outreach
  - Public Participation/Involvement
  - **Illicit Discharge Detection and Elimination**
  - Construction Site Runoff Control
  - Post Construction Runoff Control
  - Pollution Prevention/Good Housekeeping

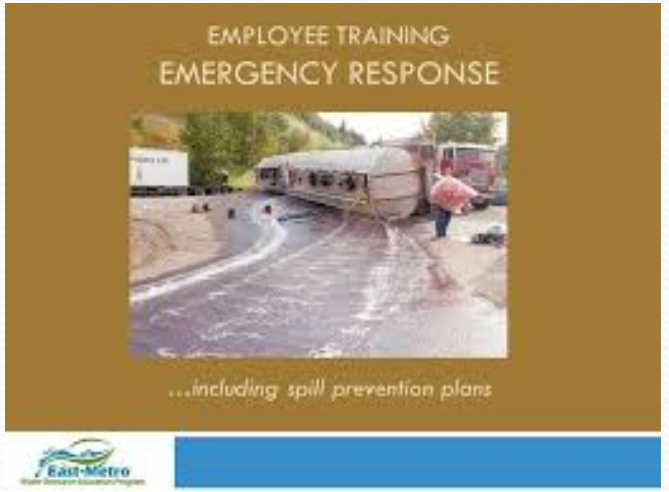
- Water Quantity
- Flooding & Drainage

- Flooding
  - FEMA Flood Insurance
  - Major Streams
  - Floodplain Management
- Drainage
  - Complaints / Customer Service
  - Minor streams/storm sewers
  - Maintenance
  - Conveyance
  - Storm Water Credits
  - New Development / Redevelopment

Purpose of City of Cold Spring IDDE Manual and Program

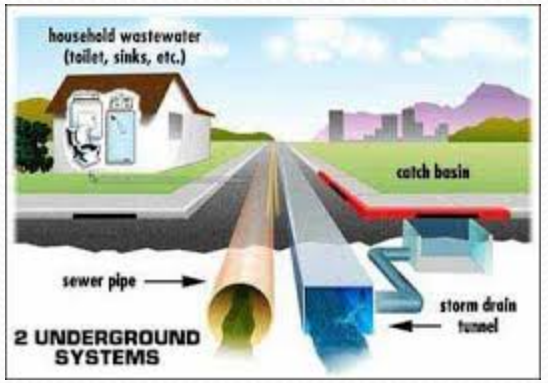
- Serves as the IDDE Plan that needs to be submitted to KDOW
- Serves as Standard Operating Procedures (SOP) for the IDDE Program
- Outlines City obligation to address and comply with the IDDE program for USEPA and KDOW

MCM 3 - IDDE Program



1. **Illicit Discharge Detection & Elimination (IDDE) Ordinance**
2. **System Mapping**
3. **Stormwater program to monitor the storm system for IDDE's**
4. **SOP Manual documenting appropriate IDDE policies and procedures**
5. **IDDE Training**

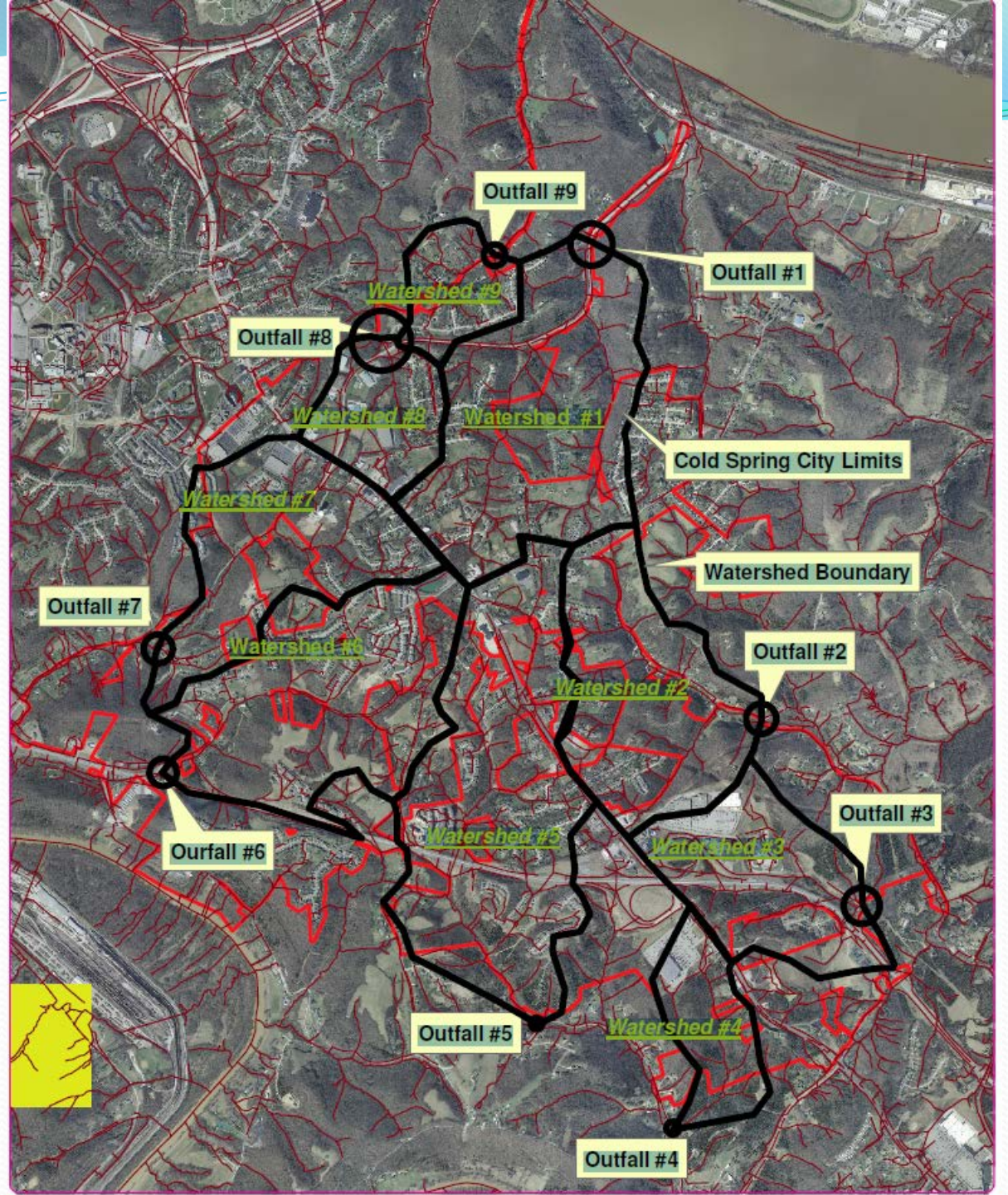
KDOW Definition - Illicit Discharge Detection and Elimination (IDDE) Program

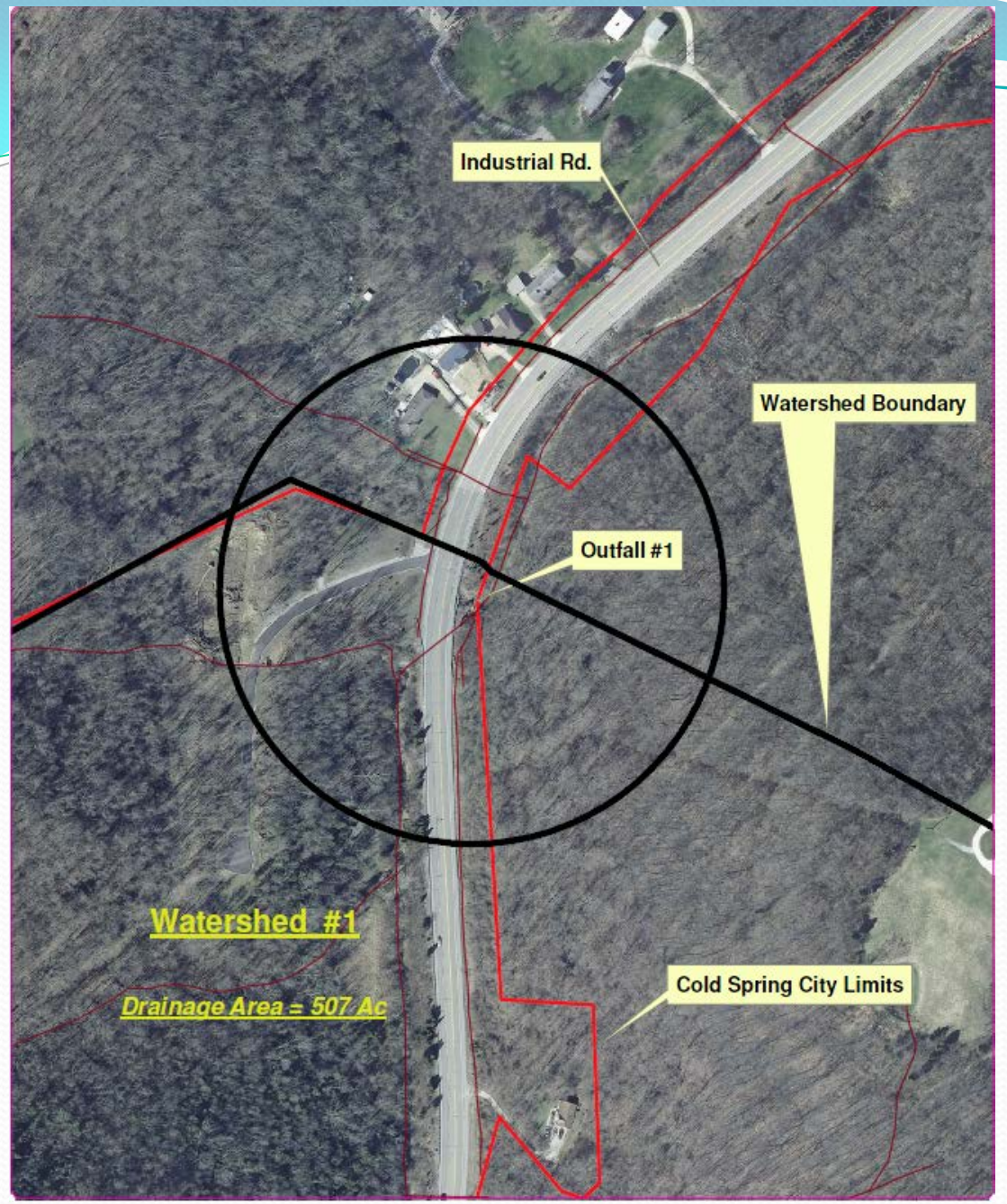


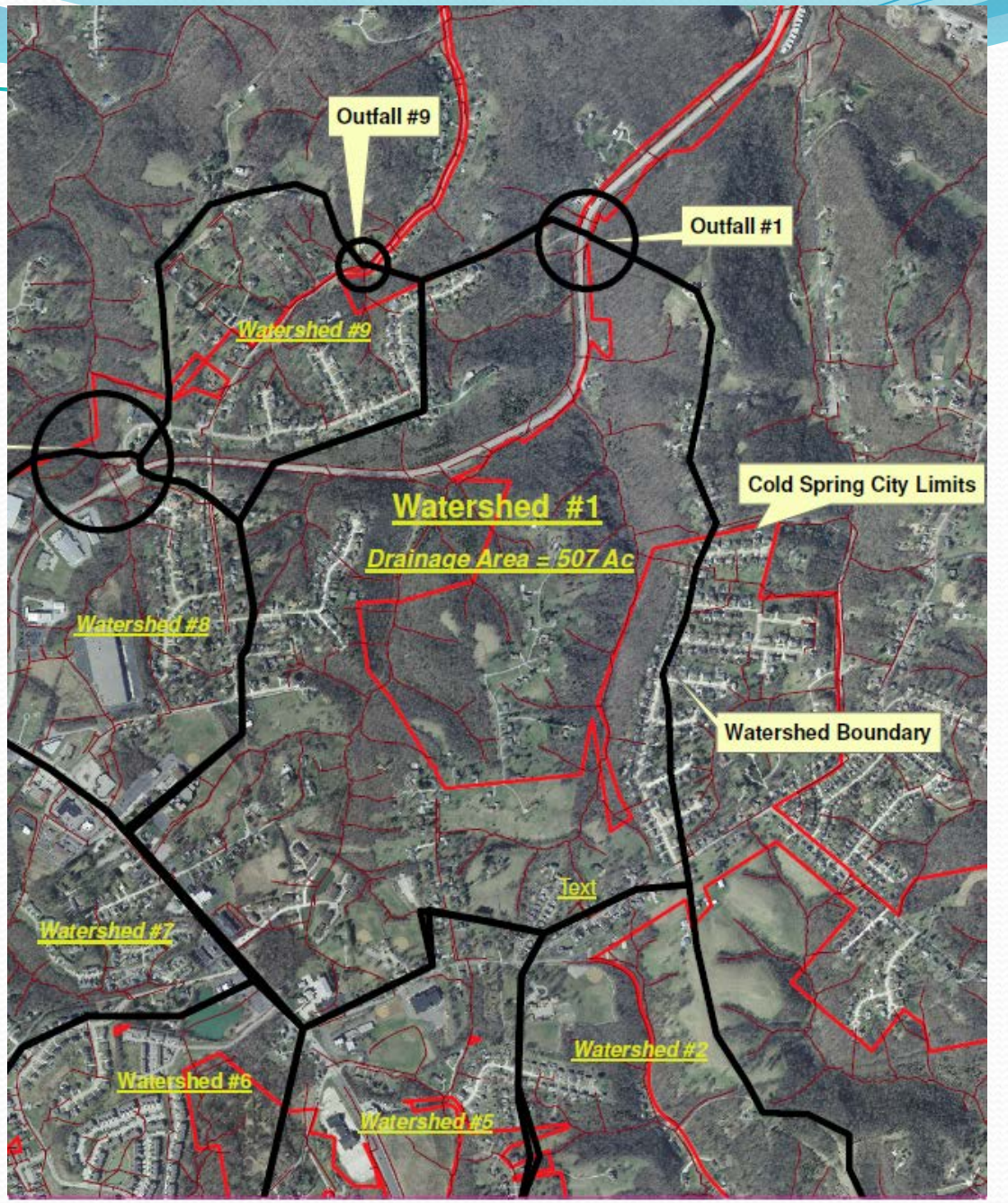
“any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges pursuant to the Kentucky Pollutant Discharge Elimination System (KPDES) permit and discharges resulting from fire-fighting activities.”

Elements of the IDDE Program

- Develop and implement a plan to detect and address illicit discharges, including illegal dumping, to the system;
- Develop an MS4 map showing the location of all outfalls, and the names and locations of all waters of the state that receive discharges from those outfalls;
- To the extent allowable under state, tribal, or local law, effectively prohibit through ordinance, or other regulatory mechanism, illicit discharges into the MS4 and implement appropriate enforcement procedures and actions as needed; and
- **Inform city employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.**


Outfall #9
Outfall #1
Watershed #9
Outfall #8
Watershed #8
Watershed #1
Cold Spring City Limits
Watershed #7
Watershed Boundary
Outfall #7
Watershed #6
Outfall #2
Watershed #2
Outfall #3
Watershed #5
Watershed #3
Ourfall #6
Outfall #5
Watershed #4
Outfall #4


Industrial Rd.
Watershed Boundary
Outfall #1
Watershed #1
Drainage Area = 507 Ac
Cold Spring City Limits


Outfall #9
Outfall #1
Watershed #9
Watershed #1
Drainage Area = 507 Ac
Cold Spring City Limits
Watershed #8
Watershed Boundary
Text
Watershed #7
Watershed #2
Watershed #6
Watershed #5

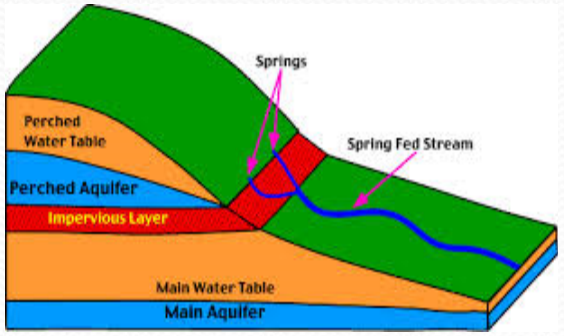
Prohibiting Illicit Discharges

- IDDE City Council Approved Ordinance

- ***The City Council approved IDDE ordinance SECTION 7 DISCHARGE PROHIBITIONS of the City of Cold Spring Municipal Code"***, states, "No person, company, developer or any other entity shall discharge or cause to be discharged into the MS4 storm drainage system or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water".

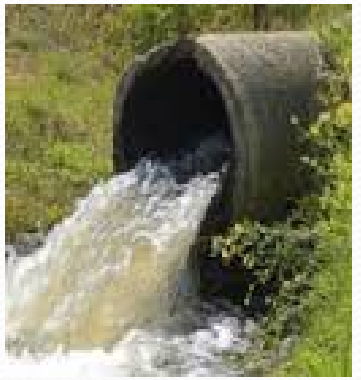
Illicit Discharge Exemptions

- water line flushing or other potable water sources,
- landscape irrigation or lawn watering,
- diverted stream flows,
- rising ground water,
- ground water infiltration to storm drains,
- uncontaminated pumped ground water,
- foundation or footing drains (not including active groundwater dewatering systems), crawl space pumps,
- air conditioning condensation ,
- springs,
- non-commercial washing of vehicles,
- natural riparian habitat or wet-land flows,
- swimming pools (if dechlorinated - typically less than one PPM chlorine),
- firefighting activities and street wash water from municipal cleaning operations, and
- any other water source not containing pollutants.



Outfall Location Areas

- According to KDOW a municipal stormwater outfall means a point source where a municipal separate storm sewer discharges to Waters of the United States,



Staff Visual Inspections of Surface (IDDE) Discharges

- Overflows of sanitary sewerage systems;
- Untreated radiator flushing wastewaters;
- Untreated engine degreasing wastes;
- Over-application of fertilizers, pesticides or herbicides onto landscaping and impervious surfaces;
- Dewatering of construction sites;
- Improper washing of concrete ready-mix trucks;
- Commercial use of soaps and detergents: used in cleaning pavement, vehicles and equipment outside;
- Latex/oil-based paints and solvents disposed of in gutters or inlets;
- Restaurant grease: improper disposal;
- Private/Public utilities improperly storing chemicals or maintaining equipment;
- Leaking dumpsters;
- Car lots for used and new vehicles dripping fluids on the pavement;
- Fuel spills;
- Hazardous materials dumped along the roadway; and
- Unidentified substances dumped in secluded areas.

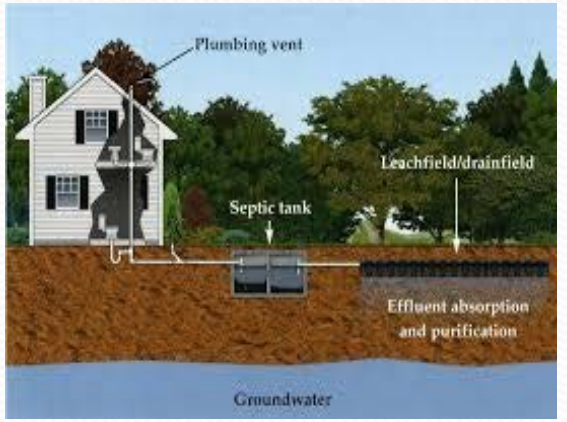
Customer Service Reporting of IDDE's

Examples of **direct** Illicit discharges

- Sanitary wastewater piping that is directly connected from a home to the storm sewer,
- Materials (e.g., used motor oil) that have been dumped illegally into a storm drain catch basin,
- A shop floor drain that is connected to the storm sewer, and
- A cross-connection between the sanitary sewer and storm sewer systems.

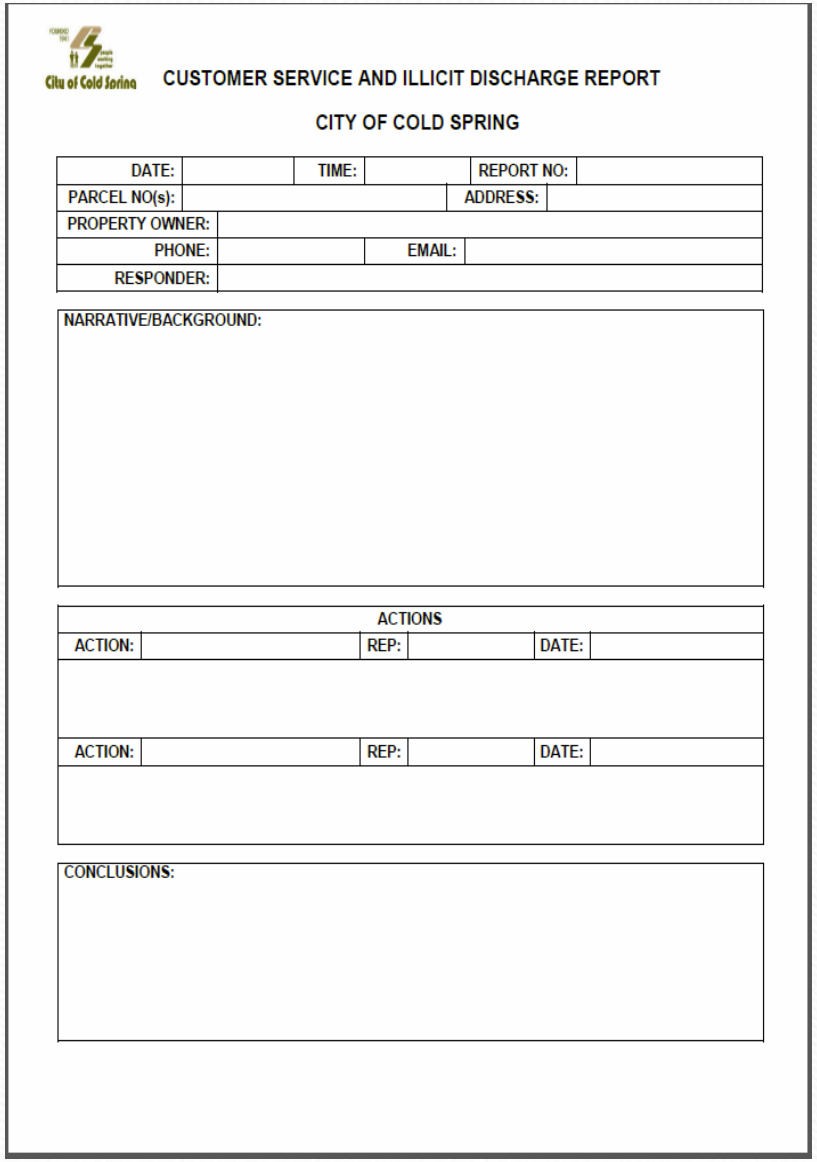
Examples of **indirect** Illicit discharges

- An old and damaged sanitary sewer line that is leaking fluids into a cracked storm sewer line, and
- A failing septic system that is leaking into a cracked storm sewer line or causing surface discharge into the storm sewer.



Customer Service Reporting of IDDE's

- Complete the IDDE Stormwater Customer Service Form



City of Cold Spring

CUSTOMER SERVICE AND ILLICIT DISCHARGE REPORT

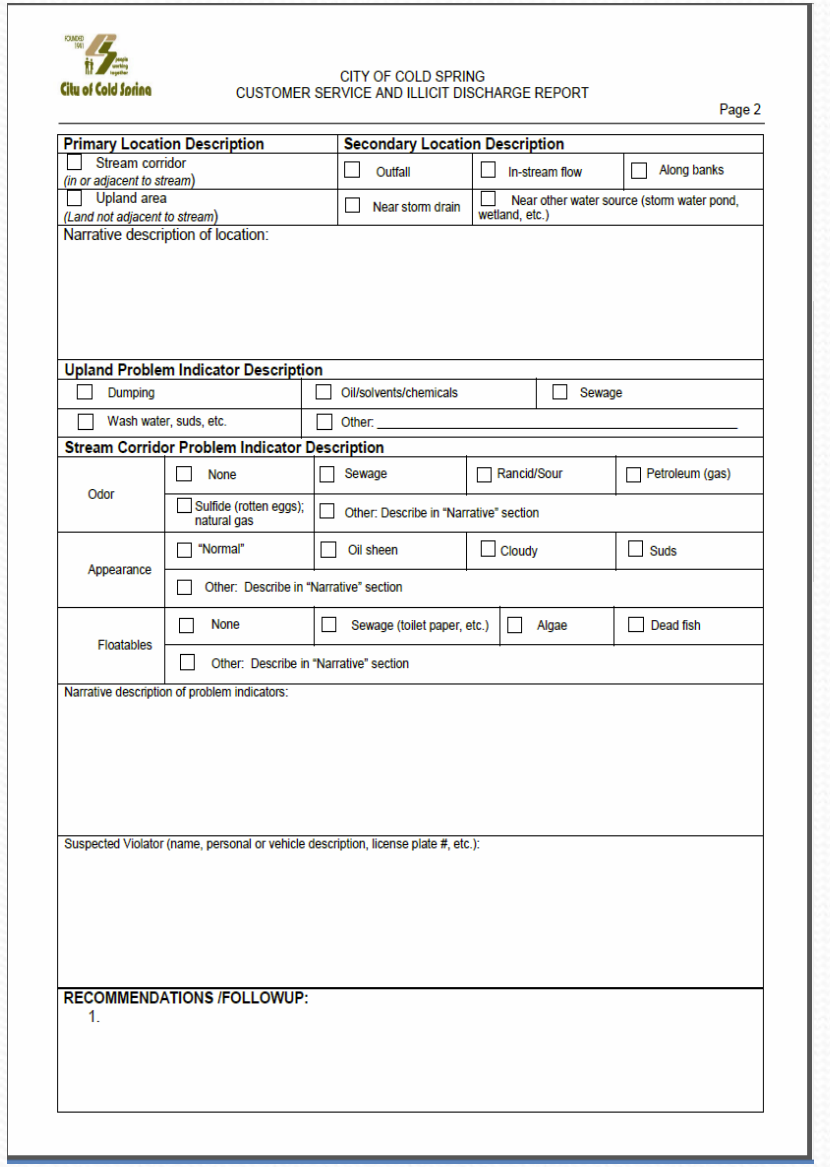
CITY OF COLD SPRING

DATE:		TIME:		REPORT NO:	
PARCEL NO(s):				ADDRESS:	
PROPERTY OWNER:					
PHONE:			EMAIL:		
RESPONDER:					

NARRATIVE/BACKGROUND:

ACTIONS					
ACTION:		REP:		DATE:	
ACTION:		REP:		DATE:	

CONCLUSIONS:



City of Cold Spring

CITY OF COLD SPRING
CUSTOMER SERVICE AND ILLICIT DISCHARGE REPORT

Page 2

Primary Location Description	Secondary Location Description		
☐ Stream corridor *(in or adjacent to stream)*	☐ Outfall	☐ In-stream flow	☐ Along banks
☐ Upland area *(Land not adjacent to stream)*	☐ Near storm drain	☐ Near other water source (storm water pond, wetland, etc.)	

Narrative description of location:

Upland Problem Indicator Description		
☐ Dumping	☐ Oil/solvents/chemicals	☐ Sewage
☐ Wash water, suds, etc.	☐ Other: _____	

Stream Corridor Problem Indicator Description				
Odor	☐ None	☐ Sewage	☐ Rancid/Sour	☐ Petroleum (gas)
	☐ Sulfide (rotten eggs); natural gas	☐ Other: Describe in "Narrative" section		
Appearance	☐ "Normal"	☐ Oil sheen	☐ Cloudy	☐ Suds
	☐ Other: Describe in "Narrative" section			
Floatables	☐ None	☐ Sewage (toilet paper, etc.)	☐ Algae	☐ Dead fish
	☐ Other: Describe in "Narrative" section			

Narrative description of problem indicators:

Suspected Violator (name, personal or vehicle description, license plate #, etc.):

RECOMMENDATIONS /FOLLOWUP:
1.

IDDE Incident Emergency Response

- Call 911 to report an IDDE
- Call City Stormwater Hotline at 859-441-6863 to report an IDDE
- 911 automatically and immediately alerts
- Notification of Central Campbell County Fire District
- Notification of Campbell County Office of Emergency Management (CCOEM)
- CCOEM contacts Hazmat contractor if applicable
- CCOEM maintains an “On The Alert” system
- Notification of Cold Spring Police Department
- Notification of Cold Spring Administrator/Clerk
- Notification of Cold Spring City Attorney
- Notification of the Cold Spring Stormwater Program Manager and Stormwater Engineer
- Notification of Cold Spring TAC Members

- See more at http://www.campbellcountyky.org

CAMPBELL COUNTY
KENTUCKY

Questions & Open Discussion