MINIMUM CONTROL MEASURE 3

Illicit Discharge Detection & Elimination

MCM 3: Illicit Discharge Detection & Elimination Program

(Permit Section: 18.1 – 18.18)

The City of Fergus Falls implements and enforces an illicit discharge detection & elimination program to help identify and eliminate illicit discharges into City’s MS4 system.

The table below provides a list of the illicit discharge detection & elimination program best management practices (BMPs) implemented by the City of Fergus Falls.

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| BMP | Description |
| MS4 Storm System Map | The City of Fergus Falls maintains and regularly updates a Storm Sewer System Map. |
| IDDE Regulatory Mechanism[[1]](#footnote-1) | The City of Fergus Falls has developed and enforces a regulatory mechanism that effectively prohibits non-stormwater discharges into the small MS4, except those non-stormwater discharges authorized under Section 18 of the permit. |
| Illicit Discharge Inspections, Detection, & Tracking | The City of Fergus Falls incorporates illicit discharge detection into all inspection and maintenance activities conducted under Section 18 of the MS4 permit and conducts site specific inspections as reports are received. |
| Staff Training Program | The City of Fergus Falls incorporates illicit discharge recognition, detection, reporting, and documentation into its regular staff training. |
| Priority Areas with Potential Illicit Discharge | The City of Fergus Falls reviews sources of non-stormwater discharges and identifies priority areas likely to have illicit discharges. |
| Enforcement Response Procedures | The City of Fergus Falls has developed and implements Enforcement Response Procedures to enforce and compel compliance with the City’s regulatory mechanism(s). |
| Documentation | The City of Fergus Falls has developed and implements documentation standards, which are included throughout this document. |

MCM 3: BMP SUMMARY SHEET

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| BMP: MS4 Storm System Map | | |
| Responsible Person:  Position Title: | | |
| BMP Description:  The City has developed and maintains a storm sewer system map of the small MS4 (as required by Section 14 and Section 18.10). The storm sewer system map depicts the following:   1. All pipes 12 inches or greater in diameter, including stormwater flow direction 2. Outfalls 3. Structural stormwater BMPs 4. Receiving waters 5. Areas where illicit discharges have been identified in the past 6. Areas with material storage (salt, hazardous waste, etc.) that could result in an illicit discharge   The City works with their City Engineer to update and maintain the storm sewer system map. An electronic file is utilized and maintained with hard copies provided to City staff. The storm sewer system map is reviewed and updated on a regular basis to reflect changes in the storm sewer system, outfalls, structural stormwater BMPs, and receiving waters and land uses associated with business/industrial activities. | | |
| BMP Activity Log | | |
| Date | **Description of Revision** | **Notes** |
| As needed | Map updates and revisions |  |
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MCM 3: BMP SUMMARY SHEET

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| BMP: IDDE Regulatory Mechanism | | |
| Responsible Person:  Position Title: | | |
| BMP Description:  The City has developed and enforces regulatory mechanisms that effectively prohibits non-stormwater discharges into the small MS4, except those non-stormwater discharges authorized under Section 18.4 of the MS4 permit and provides response procedures to compel compliance that meet Section 18.14 requirements.  The City will review and update the IDDE regulatory mechanisms, permits, standards, policies, etc. as necessary to maintain program effectiveness. | | |
| BMP Activity Log | | |
| Date | **Description of Updates / Revisions** | **Tracking** |
| 2021 | Review regulatory mechanisms including ordinance, permits, standards and policies. |  |
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| BMP: Staff Training Program for IDDE |
| Responsible Person:  Position Title: |
| BMP Description:  The City of Fergus Falls incorporates illicit discharge recognition, detection, reporting, and documentation into its regular staff training program. Documentation can be found under MCM 6: Pollution Prevention/Good Housekeeping for Municipal Operation Employee Training. |
| BMP Activity Log |
| See MCM 6 for Staff Training Program details |

MCM 3: BMP SUMMARY SHEET

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| BMP: Illicit Discharge Inspections, Detection, & Tracking |
| Responsible Person:  Position Title: |
| IDDE Inspection Procedures:  City staff inspects for sources of illicit discharges as described below:   1. City staff looks for signs of illicit discharges and illegal connections during regular inspections and maintenance of the MS4 system. Any indication of a dry weather flow (periods of 72 or more hours of no precipitation) is investigated as a potential illicit discharge and/or illegal connection. 2. City staff is watchful for signs of illicit discharges and/or illegal connections during day to day operations. Signs of potential illicit discharges or connections are promptly investigated. 3. City staff completes site specific inspections when reports of potential illicit discharge or connections are received.   IDDE Investigating, Locating, Eliminating Procedures:  Any discovered or suspected illicit discharges or illegal connections shall be reported to the City Administrator and shall be investigated by the Maintenance Department.  The City Administrator shall take the following actions:   1. Direct appropriate staff to respond/investigate illicit discharges and/or connections as necessary. 2. Oversee the required actions as a result of an investigation. 3. Oversee/direct efforts to eliminate illicit discharges and/or connections, when discovered.   The City may utilize the following tools to help locate the source of an illicit discharge or illegal connections:   1. Observations by City Staff, Police, Fire Fighters, others. 2. Reports by citizens. 3. Storm Sewer Systems (MS4) Map – suspected signs of illicit discharges are tracked upstream through the system until the source is identified. 4. Visual inspections. 5. Mobile cameras, sampling results, smoke testing, dye testing, and other inspection tools.   Records of inspections can be found under MCM 6 – Pollution Prevention/Good Housekeeping for Municipal Operation Inspections. |

MCM 3: BMP SUMMARY SHEET

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| BMP: Priority Areas and Documented Discharges/Connections | | | | | |
| Responsible Person:  Position Title: | | | | | |
| BMP Description:  The City of Fergus Falls regularly reviews potential sources of non-stormwater discharges or flows to evaluate the significance of each potential source. The City has identified the areas listed below as PRIORITY AREAS likely to have Illicit Discharges.  City staff pays particularly close attention and completes additional inspections for illicit discharges and connections while completing regular inspection and maintenance on the MS4 system and during day to day operations in these areas.  The main priority for IDDE inspections is City-operated industrial stormwater permitted facilities and other industrial stormwater permittees.  PRIORITY AREAS: | | | | | |
| Land Use:   * Industrial * Commercial (i.e. gas stations) | | Business Activities:   * Bars/Restaurants | Significant Materials:   * Material Handing Areas * Properties with Industrial Permits | | Past Discharges:  See Discharge Documentation |
| Properties with NPDES Industrial Permits:   * City Waste Water Treatment Plant * Fergus Falls Municipal Airport * City Landfill * Innova Industries * Northern Contours RTF * Northern Contours Veneer * Otter Tail Valley Railroad * Shoremaster | | | | | |
| BMP Activity Log | | | | | |
| Date | **Description** | | | **Notes** | |
| 2021 | Identification of Priority Areas | | |  | |
| 2021 | Identify Industrial Permit Holders | | |  | |
| 2021 | Update MS4 map with IDDE high-priority areas as identified | | |  | |
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MCM 3: BMP SUMMARY SHEET

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| BMP: Illicit Discharge Procedures & Enforcement |
| Responsible Person:  Position Title: |
| BMP Description:  Illicit discharges or illegal connections are eliminated promptly. Procedures have been identified and can be found within:   1. Illicit Discharge Detection and Elimination Ordinance 2. IDDE Enforcement Response Procedure   The City utilizes an IDDE / Spill Investigating and Report Form which helps outline the process and helps document the investigations, discoveries, and actions taken to eliminate illicit discharges and connections.   * 1. Referrals to other regulatory organizations (if any).   2. Date(s) violation(s) resolved. |

MCM 3: BMP SUMMARY SHEET

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| BMP: Spill Response Procedures |
| Responsible Person:  Position Title: |
| Spill Response Procedures:   * The First Person on the scene shall:  1. Protect human health and safety, observing safety precautions associated with the spilled material. 2. Stop the source of discharge, if safe to do so. 3. Call 911 if threat to public safety or immediate health. 4. Contain the discharged material, if safe to do so. (Dirt, sand, or any semi-impermeable material may be used to create a containment structure to prevent the discharge from flowing) 5. Call City Hall / Public Works Department. 6. Recover discharged material, if safe to do so. 7. Remain onsite and assist with response, reporting, and cleanup as necessary. 8. Report the spill to the MN Duty Officer, if applicable.  * The Emergency Response Personnel shall take the following actions:  1. Direct the appropriate staff to respond/cleanup discharged material and dispose of properly, if safe to do so. 2. Oversee spill clean-up actions. 3. Report the spill to the MN Duty Officer, if applicable.  * Spills/Discharges overseen by the Maintenance Department may be documented by completing an IDDE / Spill Investigation and Report Form.   It is required to notify the State Duty Officer of the discharge of any substance or material which, if not recovered, may cause pollution of waters of the state. Recovery shall happen as rapidly and as thoroughly as possible and take immediately such other action as may be reasonably possible to minimize or abate pollution of waters of the state.  MN Department of Safety Duty Officer: 1-800-422-0798  MPCA: 1-(800)-657-3864  City Phone: (218) 332-5421 |

Documentation of Compliance

**(Permit Section: 18.15)**

Responsible Person:

Position Title:

The City of Fergus Falls’ standards for documentation will include the following as required in Section 18.15 of the general permit:

* + Date(s) and location(s) of IDDE inspections conducted
  + Reports of alleged illicit discharges received, including date(s) of the report(s), and any follow-up action(s) taken by the City
  + Date(s) of discovery of all illicit discharges
  + Identification of outfalls, or other areas, where illicit discharges have been discovered
  + Sources (including a description and the responsible party) of illicit discharges (if known)
  + Action(s) taken by the City, including date(s), to address discovered illicit discharges.

MCM 3 Annual Assessment

**(Permit Section: 18.18)**

Responsible Person:

Position Title:

The City will annually assess its IDDE program to evaluate program compliance, the status of achieving the measurable requirements in Section 18, and determine how the program might be improved. The City must perform the annual assessment prior to completion of each annual report and document any modifications made to the program as a result of the annual assessment.

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| revision # | date | author | summary of changes |
|  | April 2021 | Tara Ostendorf | Original Document |
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1. This regulatory mechanism can cover IDDE, Pet Waste, and Salt Storage in the same document. [↑](#footnote-ref-1)