

## **Guidance on Developing Standard Operating Procedures for the Illicit Discharge Detection and Elimination Program required by the Phase II MS4 General Permit**

---

This document provides guidance on what municipal, State, and federal permittees should include in illicit discharge detection and elimination (IDDE) standard operating procedures (SOPs). The guidance is organized by permit requirement. Permittees should tailor their SOPs to their jurisdictions or State/federal properties, while ensuring that key information is included.

*PART IV.C.4: Develop and implement written standard operating procedures (SOPs) that specify the following:*

*a) An inspection checklist describing how outfalls are screened for dry weather flows*

The following is a list of suggested data and observations that should be included in a screening checklist

- General Information
  - Date and time of screening; last date of rain
  - Inspector
  - Contact information for the individual/department that is responsible for responding to illicit discharge incidents or complaints
  - Outfall identification, size, and material (e.g., concrete, corrugated metal pipe)
  - Size and primary land use of drainage area (e.g., industrial, commercial, residential)
- Observations
  - Observed flow (Y/N) and flow velocity (numeric or narrative)
  - Color and clarity (e.g., clear, cloudy)
  - Turbidity (e.g., slight, opaque)
  - Floatables (e.g., suds, oil)
  - Vegetation (e.g., none, excess)
  - Deposits (e.g., sediment)
  - Odor (e.g., sewage, gas)
  - Outfall condition (e.g., corrosion, cracking, erosion)
  - Chemical testing is optional when flow is observed. If chemical testing is used to identify the source of a potential illicit discharge, the threshold parameters should be included
- Results of the screening
  - Potential illicit discharge (Y/N)
  - Source (if known at the time of screening)

*b) Frequency of outfall inspections*

- Total number of outfalls in the jurisdiction or State/federal property
- Total number of outfalls required to be screened per year (based on 20% of the total number of outfalls for municipal permittees and property size for State/federal permittees)
- Frequency of screening outfalls (e.g., annually, once per permit term)

c) *Procedures for identifying the source, and eliminating spills, illegal dumping, and other suspected illicit discharges*

Procedures should include the following information

- Definition of an illicit discharge
- The storm sewer system map
- Alternative screening locations when discovering an illicit discharge is unlikely at the outfall (e.g., outfall is submerged)
- Photographs or descriptions of what types of discharges are associated with each visual/odor observation (e.g., gray discharges may be an indicator of sewage, suds may be a nearby car wash or illicit laundry washwater connection to a storm drain)
- How to trace the discharge source (e.g., inspecting observational points such as manholes further up the storm drain system, dye testing)
- For State/federal properties, procedures for determining the operator/department responsible for eliminating the discharge, and the process that must be followed to ensure the correction is made

d) *Identification of priority areas for illicit discharge screening based on pollution potential*

- Identification/description of areas of concern (e.g., commercial corridors in a county; storage areas for salt piles or vehicles/equipment on State/federal properties)
- A description of how that information is used to choose outfalls and screening frequencies

e) *Municipal: Enforcement and penalty procedures*

*State and federal: Permittee policy to ensure illicit discharges are eliminated*

- Municipal: Enforcement procedures
  - Procedures for contacting owners of properties that are determined to be the source of the discharge
  - Template notifications when letters, correction notices, or violations must be provided in writing
  - Steps of progressive enforcement (e.g., number of days allowed for correction, verbal warning, correction notices, compliance assistance, fines, options for legal action)
- State/federal: Include the policy or a summary of it with reference to where the complete document can be accessed

f) *Procedures to inform employees, businesses, and the general public of the issues relating to illegal discharges and improper waste disposal*

Examples include:

- Method of informing citizens of household hazardous waste disposal options
- Identification of recurring public events that are routinely used for public education
- Procedures for making the public or employees aware of how they can report pollution problems (e.g., disseminating the web address of a complaint submission form)

g) *Coordination with adjacent MS4 operator(s)*

- Contact information for the IDDE program staff in adjacent MS4s