

CITY OF ALGONAC
Illicit Discharge Detection and Elimination (IDDE) policy

Purpose

Under the National Pollutant Discharge Elimination System Wastewater Discharge Permit No.MIG610000, the City of Algonac is required to develop and adopt appropriate policies prohibiting illicit discharges and illegal dumping to the City of Algonac's separate storm sewer system. The permit also requires the City of Algonac to develop and implement an enforcement plan using identified enforcement mechanisms to ensure compliance with the illicit discharge policy.

The purpose of this IDDE policy is to protect the water quality and public health and safety on and around the City of Algonac, and to meet all requirements of the City of Algonac's Municipal Stormwater Permit. This policy addresses the following discharges to the City of Algonac's separate storm sewer system: illicit connections and non-stormwater discharges including spills of hazardous materials and improper disposal of pet waste and litter.

Illicit Connections

Illicit connections include any manmade conveyances connected to the City of Algonac municipal separate storm sewer system without a permit, excluding roof drains and all other similar type connections. Examples of illicit connections include, but are not limited to: sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the City of Algonac's municipal separate storm sewer system.

It is the City of Algonac policy that no illicit connections to the City of Algonac municipal separate storm sewer system are permitted. This includes, but is not limited to, the construction, use, maintenance or continued existence of illicit connections to the storm drain system. This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or prevailing policy at the time of connection.

Illicit Discharge and Illegal Dumping

Illicit discharge and Illegal dumping are any discharges or dumping activities into the City of Algonac municipal separate storm sewer system that are not composed entirely of storm water, except discharges pursuant to an NPDES stormwater permit (other than the NPDES permit for discharges from the City of Algonac municipal separate storm sewer system) and discharges resulting from the firefighting activities. (Firefighting activities permitted only if determined not to be a significant source of pollutant to the waters of the state).

This policy prohibits the following categories of non- stormwater discharges unless the stated conditions are met:

- Discharges from potable water sources, including water line flushing, hyper chlorinated water line flushing, fire hydrant system flushing, and pipeline hydrostatic test water. Planned discharges shall be de-chlorinated to a concentration of 0.1 ppm or less, pH-adjusted if necessary, and volumetrically and velocity controlled to prevent re-suspension of sediments in the MS4.

- Discharges from lawn watering and other irrigation runoff. These discharges shall be minimized through public education efforts conducted by the City of Algonac and/or St. Clair County Health Department.
- Dechlorinate city owned swimming pool discharges. The discharges shall be dechlorinated to a concentration of 0.1 ppm or less, pH-adjusted if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments in the MS4.
- Water is used to control dust, wash down of equipment, and routine external building wash down that does not use detergents. The City of Algonac shall reduce these discharges through public education activities conducted by the City of Algonac and/or St. Clair County Health Department. To avoid washing pollutants into the MS4, the City of Algonac shall minimize the amount of street wash and dust control water used.
- Other non-stormwater discharges shall be in compliance with the requirements of a stormwater pollution prevention plan reviewed by the City of Algonac which addresses control of such discharges.

The City of Algonac's policy does not prohibit the following categories of non-stormwater discharges

- Water line flushing and discharges from potable water sources
- Diverted stream flows and flows from riparian habitats and wetlands
- Landscape irrigation runoff, lawn watering runoff, and irrigation waters
- Rising ground waters and springs
- Uncontaminated ground water infiltration and seepage
- Uncontaminated pumped ground water, except for groundwater cleanups specifically authorized by NDPES permits
- Foundation drains, water from crawl space pumps, footing drains, and basement sump pumps
- Air conditioning condensate
- Waters from non-commercial carwashes
- Street wash water
- Dechlorinated swimming pool water from single, two, or three family residents.

Monitoring & Enforcement Procedures

The City of Algonac monitors for illicit connections and illicit discharges in the following manner:

1. By comprehensively mapping the City of Algonac's stormwater system, including maintaining a database of all known storm drain outfalls, labeling receiving waters, and delineating areas contributing runoff to each outfall.

2. By providing the City of Algonac's staff with regular training and education on best management practices for preventing and identifying illicit discharges, including spills.
3. By conducting yearly field inspections of at least one-third (on average) of all known outfalls. Inspection reports are recorded and filed in the relevant database. In the event of the discovery of an illicit discharge, the discharge is recorded to determine the source, extent and substance of the discharge. Enforcement procedures, as outlined below, are implemented as necessary.

In the event of an illicit discharge the City of Algonac shall implement the following enforcement procedures:

1. Contact the responsible party of the illicit discharge and establish corrective action in compliance with the City of Algonac.
2. Upon repeat or continued illicit discharges, the City of Algonac shall promptly dispatch a St. Clair County environmental employee to conduct an assessment to determine the source of the discharge and risk of reoccurrence. Upon determination of the severity of the discharge and risk of occurrence, the environmental employee, in conjunction with the Public Works Superintendent, may contact the City of Algonac Property Manager to report the discharge as a potential violation of the tenant's lease.

Review of Policy

This policy shall be reviewed as deemed appropriate by the Public Service Superintendent.