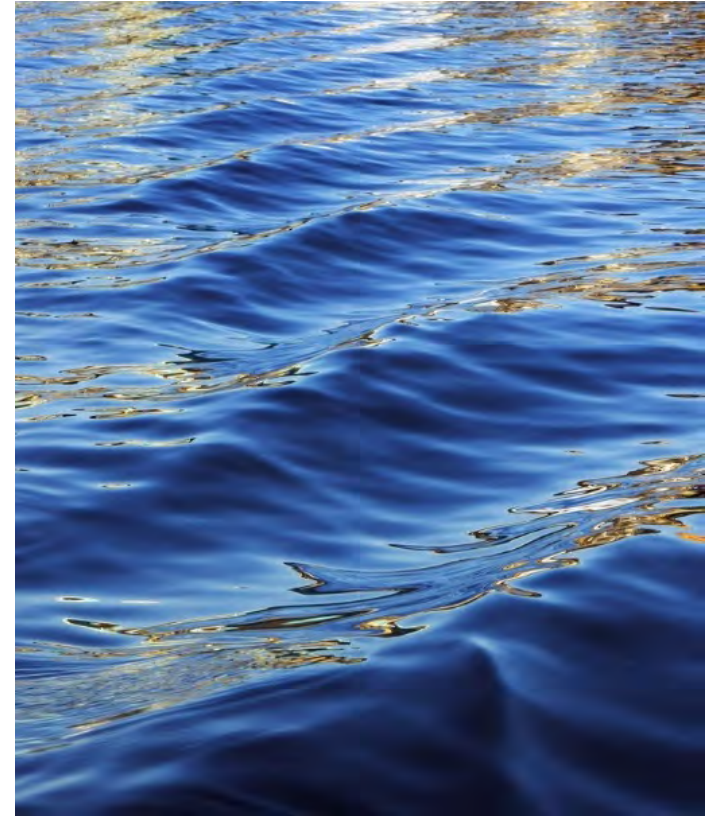# Put a Little *Prep* in Your Step:

IDDE Program Audit Preparedness

Dana Wilkinson
Monroe County MS4 Assistant and IDDE Group Chair

Overview

- Read, and re-read, 327 IAC 15-13-14
- Establish Local Legal Authority
- Develop IDDE Plan
- Get to know your Industrial Sites
- Mapping & Outfall screening

- MS4 Facilities & Spill Response
- Employee Education and Training
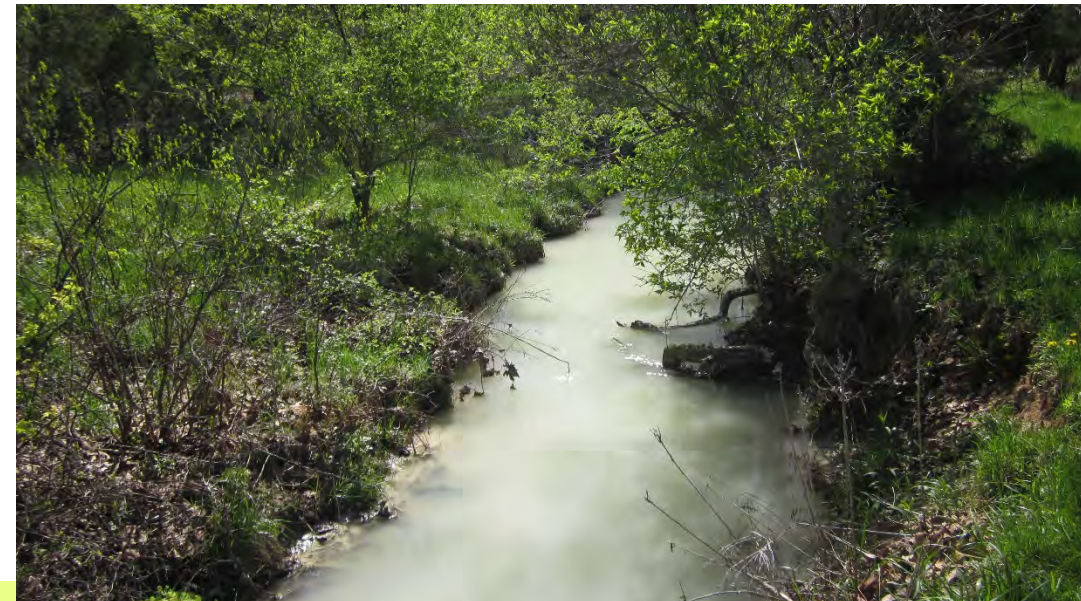- Public Education & Outreach
- Resources

Legal Authority

- Signed/Approved
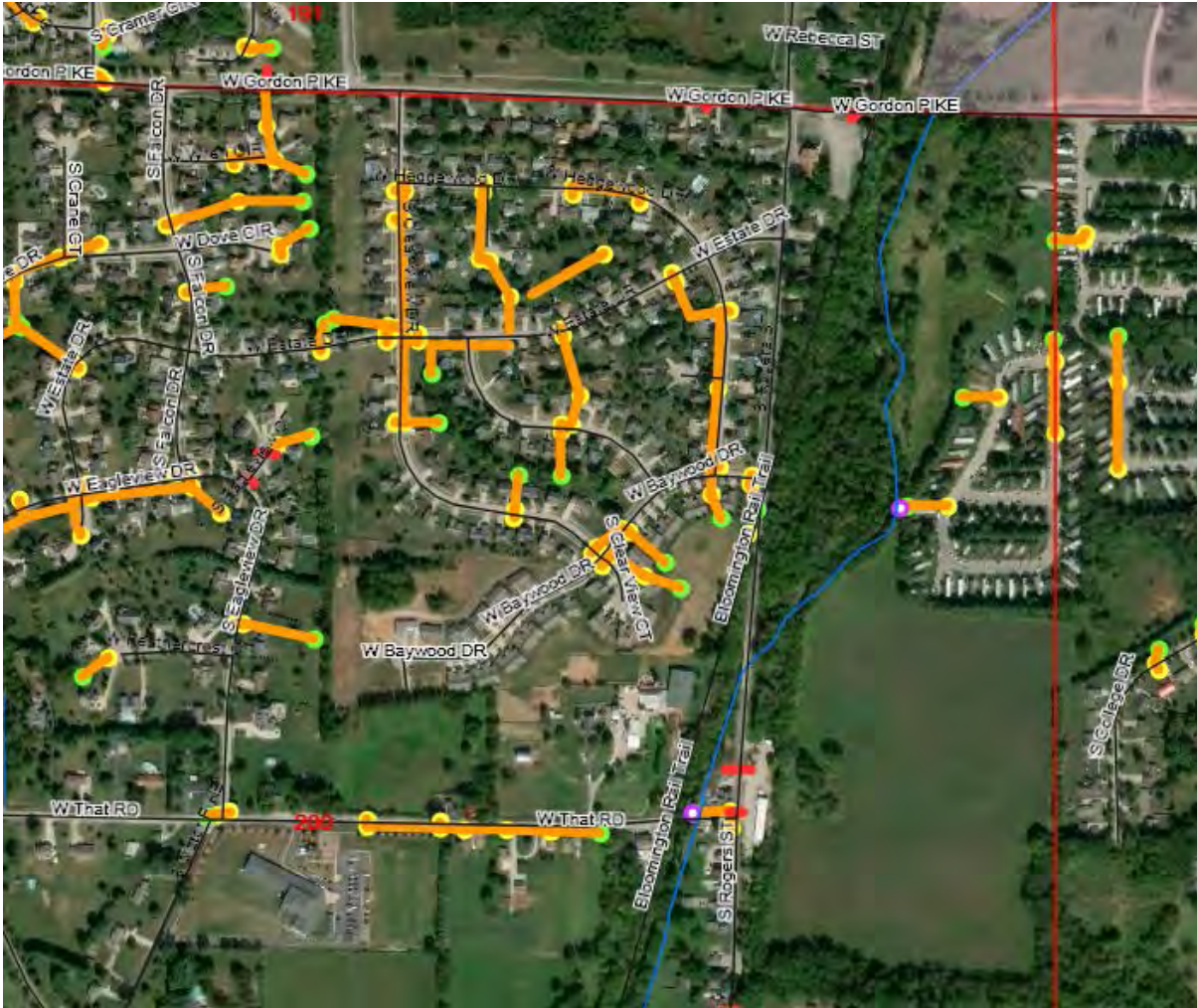- Definitions
- Enforcement
- Review

IDDE Plan

- A detailed "how-to" guide for how your MS4 will "detect, address, and eliminate illicit discharges."

- Dry-weather screening
  - Problem Areas
  - Testing methods

- Active Industrial Facilities
  - Where are they & what are they doing?

- Written process for review of Plan itself

Mapping

- Outfalls and conveyances under MS4 control

- Also include:
  - Receiving streams
  - Rule 6 Facilities, fueling stations, other items of interest

- Make sure the IDDE Plan details mapping procedures, updates, etc.

Outfall Screening

- Provide inspection sheets or electronic forms, etc.

- DOCUMENTATION of process

- Be able to provide documentation of an investigation

MS4 Outfall Inspection Form
Monroe County Stormwater Services

Date:
Inspector:
Tracking ID

LOCATION DESCRIPTION

☐ Routine Evaluation
☐ Complaint Investigation

DRY WEATHER SCREENING
☐ Presence of Flow (during dry conditions)   Describe_____
☐ Observed Pollutant Discharging   Describe_____
☐ Unusual Odor   Describe_____
☐ Unusual Color   Describe_____
☐ Pollutants in Nearby Upland Area   Describe_____
☐ Obstruction   Describe_____
☐ Condition   Describe_____

OUTFALL CHARACTERISTICS   **COMMENTS**
☐ Type   _____
☐ Material   _____
☐ Outfall Size _____
☐ Outfall Width _____
☐ Outfall Height _____

WATERSHED
☐ Main Watershed _____
☐ Sub watershed _____
☐ Receiving Water _____

GEOGRAPHIC INFORMATION   **PHOTO**
☐ Latitude ☐.☐,☐.☐" ☐
☐ Longitude ☐.☐,☐.☐"☐
☐ GIS Latitude _____
☐ GIS Longitude _____
☐ X _____
☐ Y _____

CONCLUSION
☐ Illicit Discharge Detected
☐ No Illicit Discharge Detected
☐ Further Action Needed

Employee Training/Facilities/SWPPPs

- Relevant employees

- Spill response

- Household hazardous waste collection

- Coordination with other agencies

- DOCUMENTATION of trainings

Public Education & Reporting

- Outreach materials & partnerships
- Variety of audiences
- Public reporting mechanism
- DOCUMENTATION
- Education approach detailed in IDDE Plan

Help is Out There!

- Several INAFSM IDDE Group guidance documents exist:
  - *Creating a Program Plan for Illicit Discharge Detection & Elimination*
  - *Dry Weather Screening for Illicit Discharge Detection & Elimination*
  - *Spotting Illicit Discharges Tip Card*

- And more…

December 2013

INAFSM

NPDES GUIDANCE for MS4s

Creating a Program Plan
for Illicit Discharge Detection and Elimination

Prepared by the INAFSM Stormwater Committee IDDE Group

Thank You