



Village of Lynwood

IEPA NPDES General Permit No. ILR40-0380

Illicit Discharge Detection and Elimination (IDDE) Procedures (For Outfall Inspections)



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Prepared for:
Village of Lynwood
21460 Lincoln Highway
Lynwood, IL 60411
Public Works Phone: (708) 758-8434
Village Hall Phone: (708) 758-6101

Prepared by:
Robinson Engineering, Ltd.
10045 Lincoln Highway
Frankfort, IL 60423
(815) 806-0300

A. General

Currently, illicit discharges (see definitions below) contribute considerable pollutant loads to receiving waters. There are two primary situations that contribute illicit discharges within the Village of Lynwood: 1) non-stormwater runoff from contaminated sites and, 2) the deliberate discharge or dumping of non-stormwater items into storm sewer systems or receiving waterways. Illicit discharges can enter the storm sewer system by either direct or indirect connections.

“Illicit discharge means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.” (Ref. 40 CFR 122.26(b)(2))

“Illicit discharges are defined as a storm drain that has measurable flow during dry weather containing pollutants and/or pathogens. A storm drain with measurable flow but containing no pollutants is simply considered a discharge.” (Ref. Part 1 of a four-part definition in “Illicit Discharge Detection and Elimination – A Guidance Manual”, by the Center for Watershed Protection and Robert Pitt, University of Alabama, October 2004)

For guidance on Illicit Discharge Detection and Elimination, please refer to the 2004 Illicit Discharge Detection and Elimination Guidance Manual (IDDE Guidance Manual) prepared by the Center for Watershed Protection and Robert Pitt of the University of Alabama (<http://www.cwp.org/>).

B. Illicit Discharge Ordinance

The Village of Lynwood has various ordinances in place to regulate Illicit Discharges. These include the following sections within the Village Code:

- Unlawful Dumping as discussed in Article IV, Section 34-182
- Waste Collection and various penalties in Article II, Sections 86-19 through 86-32
- Other penalties in Section 30-158

Also, the Sewer Use Ordinance prepared by the Metropolitan Water Reclamation District of Greater Chicago (MWRD) is used to regulate Illicit Discharges and Connections to the storm drainage system in the Village. This Ordinance along with the Village Code is the mechanism to allow for the execution and enforcement of the Village’s Stormwater Management Program (SWMP) and is strictly enforced.

C. Watershed Management Ordinance

Several provisions in Article 7 of the MWRD Watershed Management Ordinance (WMO) prohibit illicit discharges as part of the development process. These provisions are only applicable for regulated development activities as defined by the WMO. Regulated developments are required to meet the soil erosion and sediment control standards of the WMO contained in Article 3 – Section 302 and Article 4.

D. Potential Sources of Illicit Discharges

The vast majority of the Village consists of low to medium density residential property. There are some scattered commercial districts that are generally centered along the corridors of Torrence Avenue, Glenwood-Dyer Road, and U.S. Route 30. Industrial districts are confined to corridors along U.S. Route 30, Glenwood-Dyer Road and Stony Island Avenue. As such, the most likely illicit sources would be leakage from industrial properties such as railroad yards, light industrial or trucking facilities, runoff from commercial areas, or direct sewage discharges to the Village storm sewer system and receiving waterways.

E. Outfall Inspections

Outfall inspections are required for outfalls previously identified by the Village according to its SWMP as discharging to public receiving waterways. Upon arriving at an outfall, the field crew inspects the outfall while on foot within close enough proximity to allow for visual observations to be made and/or to take samples of the discharge for later testing.

Documenting **all** outfall inspections using the appropriate inspection form is of extreme importance and assumed to be a standard operating procedure. Photos should be included as part of the inspection documentation.

No Flow Visible

If no flow is visible, this shall be documented and the outfall designated for re-inspection according to the regular inspection cycle. However, more frequent inspections are always beneficial.

Flow Visible

If flow is visible, the inspector shall make and document observations including color, sheen, odor, or any other readily observable features describing the condition of the stormwater as per the inspection form. If any contamination is suspected, grab water samples will be taken and analyzed according to the IDDE Guidance Manual. Inspections are intended to take place biannually (2 times per year) with additional inspections to be conducted if an illicit discharge is reported.

F. Tracing

Once an outfall tests positive for a contamination, the Village will:

- 1) Review the type of contaminant, Storm Sewer Map, and activity in the area to determine the most logical source of the contamination.
- 2) Perform a manhole-by-manhole inspection in the identified reach area.

- 3) Perform additional inspection of the storm sewer system between the two manholes suspected of containing an inappropriate discharge and identify all potential sources of the illicit material.
- 4) If there is only one possible source to this section of the storm sewer system in the area, source identification and follow-up for corrective action will be conducted.
- 5) In cases where there are multiple sources, or non-definitive sources, this may require additional evaluation and testing in order to identify the contributing source.

Note: The method of testing must be approved by the Public Works Director prior to implementation. Potential testing methods include fluorometric dye tracing, smoke testing, and/or remote video inspections. Once identified, clearly document the contributing source.

G. Removal of Illicit Discharges

Removal of illicit discharge connections is required at all identified contributing sources. Eight steps are taken to definitively identify and remove an inappropriate discharge to the storm sewer system. These steps are as follows:

- Step 1: Have an outside laboratory service take a grab sample and test for the illicit discharge at the manhole located immediately downstream of the suspected discharge connection. (Note: If the type of contaminant is relatively obvious, document this as such and move on to Steps 2–8.)
- Step 2: Conduct an internal meeting with appropriate personnel likely including Public Works Personnel, Public Works Director, Building Department Code Enforcement Officer, and Stormwater Coordinator to discuss inspection and testing results and remedial procedures.
- Step 3: The Public Works Administration or approved designee shall send a notification letter to the owner/operator of the property/site suspected of discharging a pollutant. The letter should request that the owner/operator describe the activities on the site and the possible sources of non-stormwater discharges including information regarding the use of septic fields.
- Step 4: Arrange a meeting for an inspection of the property with Public Works Personnel, the Building Department Code Enforcement Officer, and the owner/operator of the property where the pollution source is suspected. Most illicit connections and improper disposals can probably be detected

during this step. Notify the site owner/operator of the problem and instruct them to take corrective measures.

- Step 5: Conduct additional tests as necessary if the initial site inspection is not successful in identifying the source of the problem. The Public Works Director is responsible for determining the appropriate testing measure to pinpoint the source.
- Step 6: If the owner/operator does not voluntarily initiate corrective action within **45 days**, the Building Department Code Enforcement Office issues a notification of noncompliance. The notification includes a description of the required action(s) and a time frame in which to assess the problem and take corrective action. Upon notification of noncompliance, the owner can be subject to any penalties stipulated in the Illicit Discharge Ordinance.
- Step 7: Conduct follow-up inspections after stipulated time frame has elapsed to determine whether corrective actions have been implemented to: 1) remove the illicit connection, or 2) eliminate the improper disposal practice.
- Step 8: If corrective actions have been completed (i.e. and the illicit discharge has been eliminated), the Public Works Administration sends a notification of compliance letter to the owner/operator of the property/site suspected of discharging a pollutant. If corrective actions have not been completed, an additional internal meeting with appropriate (municipal) personnel (likely including involved Public Works Personnel, Public Works Director, Building Department Code Enforcement Officer, and Stormwater Coordinator) is held to determine appropriate steps to obtain compliance. Appropriate actions may include monetary or other penalties.

H. Procedure Revisions:

1. 7/27/15 – Initial
- 2.
- 3.
- 4.
- 5.
- 6.