



City of St. Peters

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN



Dardenne Creek at Hwy 70

December 2011

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ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

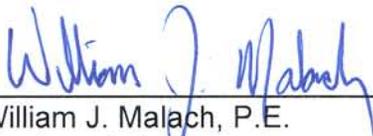
FORWARD

The primary purpose of this plan is to outline procedures to detect and remove illicit discharges and improper disposal into the City of St. Peters storm water conveyance system.

City of St. Peters is listed as a mandatory Municipal Separate Storm Sewer System (MS4) by the MDNR and is required to design a storm water management program to meet the requirements of its NPDES Phase II permit. Under the NPDES permit, City of St. Peters must satisfy minimum control measures relating to illicit discharges to the MS4. The City of St. Peters Illicit Discharge Detection and Elimination plan satisfies the requirements of MCM 3C-1 of the City of St. Peters MS4 SWPPP.

This plan satisfies the performance standard and forms a basis for the City of St. Peters to conduct effective illicit discharge control activities. An illicit discharge is any discharge other than storm water and certain exempted and conditionally exempted discharges that enter a municipal separate storm water system through unregulated activities such as illegal dumping, illicit sewer connections to the storm drain, and littering. Common illicit discharges may include oils, paints, yard waste, food waste, paper litter, garbage, household chemicals, concrete, construction debris and sewage.

The implementation of this plan is managed and coordinated by the City's Water Environment Services Group. The success of this plan is dependent on the participation of all City employees to benefit the community as a whole.



William J. Malach, P.E.
Manager, Water Environment Services

1.0 Introduction

City of St. Peters is listed as a mandatory Municipal Separate Storm Sewer System (MS4) by the MDNR and is required to design a storm water management program to meet the requirements of its NPDES Phase II permit. Under the NPDES permit, City of St. Peters must satisfy minimum control measures relating to illicit discharges to the MS4. The City of St. Peters Illicit Discharge Detection and Elimination plan satisfies the requirements of MCM 3C-1 of the City of St. Peters MS4 SWPPP. The purpose of the IDDE plan is to outline the procedures to detect and remove illicit discharges and improper disposal into the MS4 to the maximum extent practicable within the City's jurisdiction. Areas under the City's jurisdiction for the purposes of this plan include any area within the City of St. Peters municipal boundaries and all City owned facilities.

1.1 Definitions

The following terms and acronyms are used throughout this document:

BMP – Best Management Practice.

Conditionally Exempt Discharge – Non-storm water discharge that may not qualify as an illicit discharge, as defined by the US EPA (EPA 833-F-00-007). City of St. Peters may identify these discharges as significant contributors of pollutants to its MS4.

Exempt Discharge – Non-storm water discharge that does not qualify as an illicit discharge, as defined by the US EPA (EPA 833-F-00-007).

IDDE – Illicit Discharge Detection and Elimination.

Illicit Discharge – Any discharge to an MS4 that is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. This includes all non-storm water discharges except discharges pursuant to an NPDES permit and discharges that are exempt or conditionally exempt (see Section 4). Illegal dumping of hazardous/solid waste is considered an illicit discharge.

Illicit Connection – Any manmade conveyance that is connected to the MS4 without a permit or through which prohibited non-storm water flows are discharged.

ISTS – Individual Sewage Treatment System.

LGU – Local Government Unit (typically municipality or County).

MCM – Minimum Control Measure.

MDNR – Missouri Department of Natural Resources.

Municipal Separate Storm Sewer System (MS4) – A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains).

Non-Storm Water Discharge – Any discharge to the storm drain system that is not composed entirely of storm water.

NPDES – National Pollutant Discharge Elimination System.

NPDES Phase II Permit – Permit that establishes conditions for discharging storm water and other related discharges to waters of the State, in compliance with the Clean Water Act. The permit is required for discharges that are from small MS4s (as defined by the MDNR).

Outfall – A point source at the point where an MS4 discharges to receiving waters, or to other MS4s.

Pollutant – Anything which causes or contribute to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; non-hazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations, so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous substances and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive of any kind.

ROW – Right-of-way.

Storm Water Pollution Prevention Plan (SWPPP) – A compilation of BMPs to address the six MCMs and other provisions of the MS4 permit, that is designed and managed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable. Full implementation of the SWPPP must be completed by June 30, 2010.

Water and Environment Services Group (WES) – City of St. Peters Water and Environment Services Group (WES) is responsible for the treatment, and distribution of potable drinking water, collection and treatment of wastewater, storm water conveyance and pump stations, levees and flood control facilities, and organic resource recycling.

Waters of the State – All streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the state or any portion thereof.

2.0 Illicit Discharge Detection

Suspected or observed illicit discharges will be investigated to determine the source and nature of the discharge. The context of illicit discharges used in this plan includes the following categories:

- **Category 1:** Incidental spills or disposal of pollutants and other prohibited non-storm water discharges to the MS4. These may be intentional, unintentional, or accidental and could enter the MS4 through drain inlets, catch basins, manholes, or be otherwise deposited in the City ROW such that runoff may potentially reach the MS4.
- **Category 2:** Continuous or intermittent discharges of sanitary sewage to the MS4 due to the failure or leakage of an ISTS.
- **Category 3:** Continuous or intermittent disposal of pollutants or other prohibited non-storm water discharges to the MS4 other than through an illicit connection. These could occur as surface runoff from outside the City ROW (e.g., wash-down area from an industrial site).
- **Category 4:** Continuous or intermittent disposal of pollutants or other prohibited non-storm water discharges to the MS4 through an illicit connection. Detection of illicit discharges will be accomplished as outlined below.

2.1 Identify Illicit Discharges

2.1.1 Priority Areas

Priority areas are selected based on the likelihood of illicit connections (Category 4 illicit discharges), which typically are found in areas with older sanitary sewer lines. Illicit discharge detection will be performed in the priority areas listed in Section 4.3 as part of the normal daily activities of City and WES field staff. They will primarily inspect for Category 1-3 illicit discharges.

WES will perform targeted inspections in the priority areas on a rotating basis. WES will inspect for Category 1-4 illicit discharges. WES staff inspects 20% of the MS4 outfalls yearly; illicit discharge inspections will be integrated into a standard outfall inspection procedure as outlined in Section 5. MS4 outfall inspections will be scheduled during dry weather (at least 48 hours with no precipitation).

2.1.2 Other Areas

All other areas within the City's jurisdiction that are not listed as priority areas in Section 4.3 will be targeted for illicit discharge detection as part of the normal daily activities of WES field staff.

2.2 Find the Source

When a problem area or discharge is found, additional efforts are necessary to determine the source of the discharge. Upon discovery of a problem area or prohibited discharge where the source is in question, WES will determine the best method of searching. Methods that can find the source of illicit discharges include: thorough inspections by trained WES staff, water sampling/testing, dye-testing buildings in the problem areas, dye- or smoke-testing buildings at the time of sale, tracing the discharge upstream in the storm sewer, and using video to inspect storm sewers.

2.3 Responsible Parties

The City of St. Peters WES Group will be responsible for illicit discharge detection and illicit discharge inspections.

WES field staff will be required to attend periodic IDDE training. Upon discovery of potential illicit discharges, City staff must document the discovery, investigate the discharge source, and document the discharge source into the City's GIS system. City staff will contact the discharger as outlined in Section 3.1.

2.4 Anonymous Reporting

At any time, individuals identifying or suspecting a potential illicit discharge may report the incident anonymously. Individuals may report the potential illicit discharge by calling the City of St. Peters Citizen Action Center (636-477-6600 extension 1225). The CAC line is answered during regular business hours, Monday-Friday, 8:30 a.m.-5 p.m., except during holidays. After business hours or on weekends, individuals may also call the CAC 24-hour service line (636-477-6600 extension 1225) and leave a voicemail to report a non-emergency discharge.

Individuals may also report a potential illicit discharge using the City's online "e-Resident" service. "e-Resident" allows City of St. Peters residents submit an online concern to the CAC. "e-Resident" can be accessed on the City's webpage www.stpetersmo.net.

2.5 Document Actions Taken

All actions relating to illicit discharge detection will be recorded in a database administered by the City of St. Peters WES Group. The database will be organized by MS4 outfall and will contain information such as: the number of outfalls inspected, any complaints received, and the number of dye or smoke tests conducted. Illicit discharge detection activities will also be documented on the storm sewer system map.

2.6 Illicit Discharge Training

WES will coordinate annual illicit discharge detection training sessions with WES Staff and other appropriate City departments (i.e. Streets, Parks, Solid Waste). WES will provide IDDE educational opportunities to members of the public in conjunction with other MS4 public education efforts.

3.0 Illicit Discharge Elimination

3.1 Illicit Discharge Management

All illicit discharges that fall outside normal City responsibilities will be directed to the adjacent jurisdiction storm water manager.

When illicit discharges in Categories 1-3 are documented, WES will work with the discharger to find a solution to the problem, including offering limited technical assistance for restoration activities.

When an illicit discharge in Category 4 is documented, WES will direct the discharger to remove/correct the illicit connection. WES and other agencies may offer technical assistance to the discharger to ensure that the problem is corrected.

In all cases the discharger will be notified of an illicit discharge violation and referred to local, state, and federal agencies with jurisdiction.

3.2 Enforcement

City of St. Peters will develop and implement enforcement procedures in accordance with the Illicit Discharge Connection Ordinance 5127. Other local, state, and federal agencies will be notified of illicit discharges under their jurisdiction. The City of St. Peters WES Group will ensure that all agencies that have jurisdiction collaborate so that enforcement efforts are coordinated.

3.3 Responsible Parties

The WES Group is responsible for illicit discharge elimination within the City of St. Peters.

3.4 Document Actions Taken

All actions relating to illicit discharge elimination will be recorded in a database administered by the WES Group. The database will be organized by MS4 outfall and will contain information such as: the number of illicit connections eliminated, any complaints received and corrected, and the number of discharges and quantities of flow eliminated. Illicit discharge elimination activities will also be documented on the storm sewer system map.

3.5 Coordination Opportunities

The City of St. Peters will coordinate illicit discharge elimination efforts with other LGUs and watershed districts/water management organizations within City of St. Peters in order to eliminate duplication of effort within the City of St. Peters ROW.

4.0 Exempt Discharges

4.1 Conditionally Exempt Discharges

1. Water line flushing
2. Irrigation water
3. Discharges from potable water sources
4. Dechlorinated swimming pool discharges (< 1ppm)
5. Street wash water
6. Foundation drains
7. Air conditioner condensate
8. Water from crawl space pumps
9. Individual residential car washing
10. Footing drains
11. Uncontaminated pumped groundwater
12. Non-commercial car washing

4.2 Exempt Discharges

1. Diverted stream flows
2. Rising ground waters
3. Uncontaminated groundwater infiltration
4. Springs
5. Flow from riparian habitats or wetlands
6. Flows from fire-fighting activities

4.3 Priority Areas for Illicit Discharge Detection

1. All City Facilities
2. Areas zoned I-1 or I-2
 - Arrowhead Industrial Park
 - Avemco
 - Brown Road Industrial Park
 - Centre Pointe
 - Cherokee Industrial Park
 - Conner Subdivision
 - Granada Cyclery
 - Graeler Park
 - Gundaker Yard 141
 - Harvestowne
 - Harvestowne Plaza
 - Heritage Industrial Energy
 - Horizon Business Center
 - I-70 Parkway
 - I-70 Trade Center
 - Industrial Park West
 - Kaplan Subdivision
 - Lami Industrial Park
 - Mid Pointe Center/South 94 Retail
 - Mid Rivers Trade Center
 - Mid Rivers Trade Park
 - MyCar Subdivision
 - ORF Commercial Estates
 - Park West Industrial
 - Salt River Business Park
 - St. Peters Environmental Park
 - St. Peters Industrial Park
 - St. Peters Trade Centre
 - Triad South Industrial Park
 - Twillman Center
 - Walmart First Addition Subdivision

5.0 – Outfall Inspection Procedures & Training

5.1 – Outfall Inspection Procedures:

When a problem area or discharge is found, additional efforts are necessary to determine the source of the discharge. Upon discovery of a problem area or prohibited discharge where the source is in question, WES will determine the best method of searching. Methods that can find the source of illicit discharges include: thorough inspections by trained WES staff, water sampling/testing, dye-testing buildings in the problem areas, dye- or smoke-testing buildings at the time of sale, tracing the discharge upstream in the storm sewer, and using video to inspect storm sewers.

All actions relating to illicit discharge elimination will be recorded in a database administered by the WES Group. The database will be organized by MS4 outfall and will contain the information listed in the *Outfall Reconnaissance Inventory/Sample Collection Field Sheet* in Appendix B. Inspectors will use either a hard copy of the Collection Field Sheet or an electronic form to record their findings. Illicit discharge elimination activities will also be documented on the storm sewer system map.

5.2 – Training

Each year before WES Field staff inspects outfalls, the Collection Field Sheet will be reviewed and staff will be trained on the proper techniques of inspecting the outfall, data entry in the field, recording the data, and updating the storm sewer map.



City of St. Peters

ILLCIT DISCHARGE DETECTION AND ELIMINATION PLAN

APPENDIX A

**ORDINANCE 5127
ILLCIT DISCHARGE AND CONNECTION REGULATIONS**

ORDINANCE NO. 5127

AN ORDINANCE OF THE CITY OF ST. PETERS, MISSOURI, ENACTING A NEW SECTION OF THE CITY CODE, CHAPTER 720: ILLICIT DISCHARGE AND CONNECTION REGULATIONS

NOW THEREFORE, BE IT ORDAINED BY THE BOARD OF ALDERMEN OF THE CITY OF ST. PETERS, AS FOLLOWS:

SECTION NO. 1. That Section 720: Illicit Discharge and Connection Regulations of the St. Peters City Code shall be and is hereby enacted as follows:

CHAPTER 720:

Illicit Discharge and Connection Regulations
Article I
In General

SECTION 720.010 PURPOSE/INTENT.

The purpose of this ordinance is to provide for the health, safety, and general welfare of the citizens of St. Peters through the regulation of non-storm water discharges to the storm drainage system to the maximum extent practicable as required by federal and state law. This ordinance establishes methods for controlling the introduction of pollutants into the municipal separate storm sewer system (MS4) in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process. The objectives of this ordinance are:

- (1) To regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) by storm water discharges by any user
- (2) To prohibit Illicit Connections and Discharges to the municipal separate storm sewer system
- (3) To establish legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance with this chapter.

SECTION 720.020 DEFINITIONS.

For the purposes of this chapter, the following shall mean:

Authorized Enforcement Agency: The City of St. Peters or other political subdivisions of the State of Missouri authorized to regulate the discharge or control of storm water.

Best Management Practices (BMPs): schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to storm water, receiving waters, or storm water conveyance systems. BMPs also include treatment

practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

Clean Water Act. The federal Water Pollution Control Act (33 U.S.C., 1251 et seq.), and any subsequent amendments thereto.

Construction Activity. Activities subject to NPDES Construction Permits. These include construction projects resulting in land disturbance of 1 acre or more. Such activities include but are not limited to clearing and grubbing, grading, excavating, and demolition.

Director. Manager of Public Works Services of the City of St. Peters or designee.

Hazardous Materials. Any material, including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Illegal Discharge. Any direct or indirect non-storm water discharge to the storm drain system, except as exempted in Section 720.070.

Illicit Connections. An illicit connection is defined as either of the following:

Any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the storm drain system including but not limited to any conveyances which allow any non-storm water discharge including sewage, process wastewater, and wash water to enter the storm drain system and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by the City of St. Peters; or any drain or conveyance connected from a commercial or industrial land use to the storm drain system which has not been documented in plans, maps, or equivalent records and approved by the City of St. Peters.

Industrial Activity. Activities subject to NPDES Industrial Permits as defined in 40 CFR, Section 122.26 (b)(14).

National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit. means a permit issued by EPA (or by a State under authority delegated pursuant to 33 USC , 1342(b)) that authorizes the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

Non-Storm Water Discharge. Any discharge to the storm drain system that is not composed entirely of storm water.

Person: Means any individual, association, organization, partnership, firm, corporation or other entity recognized by law and acting as either the owner or as the owner's agent.

Pollutant. Anything which causes or contributes to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; non-hazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations, so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous substances and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.

Premises. Any building, lot, parcel of land, or portion of land whether improved or unimproved including adjacent sidewalks and parking strips.

Storm Drainage System. Publicly-owned facilities by which storm water is collected and/or conveyed, including but not limited to any roads with drainage systems, municipal streets, gutters, curbs, inlets, piped storm drains, pumping facilities, retention and detention basins, natural and human-made or altered drainage channels, reservoirs, and other drainage structures.

Storm Water. Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

Storm water Pollution Prevention Plan (SWPPP): A document which describes the Best Management Practices and activities to be implemented by a person or business to identify sources of pollution or contamination at a site and the actions to eliminate or reduce pollutant discharges to Storm water, Storm water Conveyance Systems, and/or Receiving Waters to the Maximum Extent Practicable.

Wastewater means any water or other liquid, discharged from a facility that is “wastewater” as defined by 10 CSR 20-2.010, as amended.

SECTION 720.030. APPLICABILITY.

This chapter shall apply to all water entering the storm drain system generated on any developed and undeveloped lands unless explicitly exempted by the City of St. Peters.

SECTION 720.040. RESPONSIBILITY FOR ADMINISTRATION.

The Director shall administer, implement, and enforce the provisions of this chapter.

SECTION 720.050. SEVERABILITY.

The provisions of this ordinance are hereby declared to be severable. If any provision, clause, sentence, or paragraph of this Chapter or the application thereof to any person, establishment, or circumstances shall be held invalid, such invalidity shall not affect the other provisions or application of this Chapter.

SECTION 720.060. ULTIMATE RESPONSIBILITY.

The standards set forth herein and promulgated pursuant to this ordinance are minimum standards; therefore this ordinance does not intend nor imply that compliance by any person will ensure that there will be no contamination, pollution, nor unauthorized discharge of pollutants.

SECTION 720.070. DISCHARGE PROHIBITIONS.

Prohibition of Illegal Discharges.

No person shall discharge or cause to be discharged into the municipal storm drain system or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than storm water.

The commencement, conduct or continuance of any illegal discharge to the storm drain system is prohibited except as described as follows:

- (1) The following discharges are exempt from discharge prohibitions established by this ordinance: water line flushing or other potable water sources, landscape irrigation or lawn watering, diverted stream flows, rising ground water, ground water infiltration to storm drains, uncontaminated pumped ground water, foundation or footing drains (not including active groundwater dewatering systems), crawl space pumps, air conditioning condensation, springs, non-commercial washing of vehicles, natural riparian habitat or wet-land flows, swimming pools (if dechlorinated - typically less than one (1) PPM chlorine), fire fighting activities, and any other water source not containing Pollutants.
- (2) Discharges specified in writing by the Director as being necessary to protect public health and safety.
- (3) Dye testing is an allowable discharge, but requires a verbal notification to the Director prior to the time of the test.

- (4) The prohibition shall not apply to any non-storm water discharge permitted under an NPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the Federal Environmental Protection Agency, provided that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the storm drain system.

Prohibition of Illicit Connections.

- (1) The construction, use, maintenance or continued existence of illicit connections to the storm drain system is prohibited.
- (2) This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
- (3) A person is considered to be in violation of this ordinance if the person connects a line conveying sewage to the MS4, or allows such a connection to continue.

SECTION 720.080. SUSPENSION OF ACCESS TO STORM WATER DRAINAGE SYSTEM.

Suspension due to Illicit Discharges in Emergency Situations

The Director may, without prior notice, suspend storm water drainage system discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the storm water drainage system or Waters of the United States. If the violator fails to comply with a suspension order issued in an emergency, the Director may take such steps as deemed necessary to prevent or minimize damage to the storm water drainage system or to the Waters of the United States, or to minimize danger to persons.

Suspension due to the Detection of Illicit Discharge

Any person discharging to the storm water drainage system in violation of this ordinance may have their storm water drainage system access terminated if such termination would abate or reduce an illicit discharge. The Director will notify a violator of the proposed termination of its storm water drainage system access. The violator may petition the Director for a reconsideration and hearing.

A person commits an offense if the person reinstates storm water drainage system access to premises terminated pursuant to this Section, without the prior approval of the Director.

SECTION 720.090. INDUSTRIAL OR CONSTRUCTION ACTIVITY DISCHARGES.

Any person subject to an industrial or construction activity NPDES storm water discharge permit shall comply with all provisions of such permit. Proof of compliance with said permit may be required in a form acceptable to the Director prior to the allowing of discharges to the storm water drainage system.

SECTION 720.100. MONITORING OF DISCHARGES

- (1) Applicability.
This section applies to all facilities that have storm water discharges associated with industrial activity, including construction activity.
- (2) Access to Facilities.

- a) The Director shall be permitted to enter and inspect facilities subject to regulation under this chapter as often as may be necessary to determine compliance with this chapter. If a discharger has security measures in force, which require proper identification and clearance before entry into its premises, the discharger shall make the necessary arrangements to allow access to representatives of the Director.
- b) Facility operators shall allow the Director ready access to all parts of the premises for the purposes of inspection, sampling, examination and copying of records that must be kept under the conditions of an NPDES permit to discharge storm water, and the performance of any additional duties as defined by state and federal law.
- c) The Director shall have the right to set up on any permitted facility such devices, as are necessary to conduct monitoring and/or sampling of the facility's storm water discharge.
- d) The Director has the right to require the discharger to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the discharger at its own expense. All devices used to measure storm water flow and quality shall be calibrated to ensure their accuracy.
- e) Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the operator at the written or oral request of the Director and shall not be replaced. The costs of clearing such access shall be borne by the operator.
- f) Unreasonable delays in allowing the Director access to a permitted facility is a violation of a storm water discharge permit and of this chapter. A person who is the operator of a facility with a NPDES permit to discharge storm water associated with industrial activity commits an offense if the person denies the Director reasonable access to the permitted facility for the purpose of conducting any activity authorized or required by this chapter.
- g) If the Director has been refused access to any part of the premises from which storm water is discharged, and he/she is able to demonstrate probable cause to believe that there may be a violation of this chapter, or that there is a need to inspect and/or sample as part of a routine inspection and sampling program designed to verify compliance with this chapter or any order issued hereunder, or to protect the overall public health, safety, and welfare of the community, then the Director may seek issuance of a search warrant from any court of competent jurisdiction.

SECTION 720.110. REQUIREMENT TO PREVENT, CONTROL, AND REDUCE STORM WATER POLLUTANTS BY THE USE OF BEST MANAGEMENT PRACTICES.

The City of St. Peters will adopt requirements identifying Best Management Practices for any activity, operation, or facility, which may cause or contribute to pollution or contamination of storm water, the storm drain system, or waters of the U.S. The owner or operator of a commercial or industrial establishment shall provide, at their own expense, reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses through the use of these structural and non-structural BMPs. Further, any person responsible for a property or premise, which is, or may be, the source of an illicit discharge, may be required to implement, at said person's expense, additional structural and non-structural BMPs to prevent the further discharge of pollutants to the municipal separate storm sewer system. Compliance with all terms and conditions of a

valid NPDES permit authorizing the discharge of storm water associated with industrial activity, to the extent practicable, shall be deemed compliance with the provisions of this section. These BMPs shall be part of a storm water pollution prevention plan (SWPP) as necessary for compliance with requirements of the NPDES permit.

SECTION 720.120. WATERCOURSE PROTECTION.

Every person owning property through which a watercourse passes, or such person's lessee, shall keep and maintain that part of the watercourse within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse. In addition, the owner or lessee shall maintain existing privately owned structures within or adjacent to a watercourse, so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse.

SECTION 720.130. NOTIFICATION OF SPILLS.

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into storm water, the storm drain system, or water of the U.S. said person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of non-hazardous materials, said person shall notify the Director in person or by phone or facsimile no later than the next business day. Notifications in person or by phone shall be confirmed by written notice addressed and mailed to the City of St. Peters within three business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least three (3) years.

SECTION 720.140. ENFORCEMENT.

(1) Notice of Violation.

Whenever the Director finds that a person has violated a prohibition or failed to meet a requirement of this Chapter, the Director may order compliance by written notice of violation to the responsible person. Such notice may require without limitation:

- a) The performance of monitoring, analyses, and reporting;
- b) The elimination of illicit connections or discharges;
- c) That violating discharges, practices, or operations shall cease and desist;
- d) The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; and
- e) Payment of a fine to cover administrative and remediation costs; and
- f) The implementation of source control or treatment BMPs.

If abatement of a violation and/or restoration of affected property is required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said notice shall further advise that, should the violator fail to remediate or restore within the established deadline, the work

will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

SECTION 720.150. APPEAL OF NOTICE OF VIOLATION

Any person receiving a Notice of Violation may appeal the determination of the Director. The notice of appeal must be received within fifteen (15) days from the date of the Notice of Violation. Hearing on the appeal before the appropriate authority or his/her designee shall take place within fifteen (15) days from the date of receipt of the notice of appeal. The decision of the Director or their designee shall be final.

SECTION 720.160. ENFORCEMENT MEASURES AFTER APPEAL

If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, or , in the event of an appeal, within fifteen (15) days of the decision of the Director upholding the appealed decision of the Director, then the Director shall enter upon the subject private property and are authorized to take any and all measures necessary to abate the violation and/or restore the property. It shall be unlawful for any person, owner, agent or person in possession of any premises to refuse to allow the Director or designated contractor to enter upon the premises for the purposes set forth above.

SECTION 720.170. COST OF ABATEMENT OF THE VIOLATION

Within sixty (60) days after abatement of the violation, the owner of the property will be notified of the cost of abatement, including administrative costs. If the amount due is not paid within a timely manner as determined by the charges shall become a special assessment against the property and shall constitute a lien on the property for the amount of the assessment. Any person violating any of the provisions of this article shall become liable to the city by reason of such violation. The liability shall be paid in not more than 12 equal payments. Interest at the rate of 1.5 percent per annum shall be assessed on the balance beginning on the 30th day following discovery of the violation.

SECTION 720.180. INJUNCTIVE RELIEF

It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Chapter. If a person has violated or continues to violate the provisions of this chapter, the Director may petition for a preliminary or permanent injunction restraining the person from activities which would create further violations or compelling the person to perform abatement or remediation of the violation.

SECTION 720.190. COMPENSATORY ACTION

In lieu of enforcement proceedings, penalties, and remedies authorized by this Chapter, the Director may impose upon a violator alternative compensatory actions, such as storm drain stenciling, attendance at compliance workshops, creek cleanup, etc.

SECTION 720.200 VIOLATIONS DEEMED A PUBLIC NUISANCE

In addition to the enforcement processes and penalties provided, any condition caused or permitted to exist in violation of any of the provisions of this Ordinance is a threat to public health, safety, and welfare, and is declared and deemed a nuisance, and may be summarily abated or restored at the violator's expense, and/or a civil action to abate, enjoin, or otherwise compel the cessation of such nuisance may be taken.

SECTION 720.210 CRIMINAL PROSECUTION

Any person that has violated or continues to violate this ordinance shall be liable to criminal prosecution to the fullest extent of the law, and shall be subject to a criminal penalty of five hundred dollars (\$500.00) per violation per day and/or imprisonment for a period of time not to exceed thirty (30) days. The City of St. Peters may recover all attorney's fees court costs and other expenses associated with enforcement of this ordinance, including sampling and monitoring expenses.

SECTION 720.220. REMEDIES NOT EXCLUSIVE

The remedies listed in this chapter are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of the Director to seek cumulative remedies.

SECTION NO. 2. Savings Clause.

Nothing contained herein shall in any manner be deemed or construed to alter, modify, supersede, supplant or otherwise nullify any other Ordinance of the City or the requirements thereof whether or not relating to or in any manner connected with the subject matter hereof, except as expressly set forth herein.

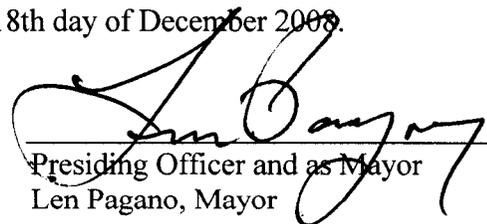
SECTION NO. 3. Severability Clause.

If any term, condition, or provision of this Ordinance shall, to any extent, be held to be invalid or unenforceable, the remainder hereof shall be valid in all other respects and continue to be effective and each and every remaining provision hereof shall be valid and shall be enforced to the fullest extent permitted by law, it being the intent of the Board of Aldermen that it would have enacted this Ordinance without the invalid or unenforceable provisions. In the event of a subsequent change in applicable law so that the provision which had been held invalid is no longer invalid, said provision shall thereupon return to full force and effect without further action by the City and shall thereafter be binding.

SECTION NO. 4. Effective Date.

This Ordinance shall take effect and be in force from and after its passage by the Board of Aldermen and its approval by the Mayor of the City of St. Peters.

Read two times, passed, and approved this 18th day of December 2008.



Presiding Officer and as Mayor
Len Pagano, Mayor

Attest: 

Rhonda Fleming Shaw, City Clerk



City of St. Peters

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

APPENDIX B

**OUTFALL RECONNAISSANCE INVENTORY/ SAMPLE
COLLECTION FIELD SHEET**



Outfall Reconnaissance Inventory/ Sample Collection Field Sheet

Section 1 Background Data

Today's Date:		Outfall ID:	
Investigators:		Time (Military)	
Ambient Temperature (F):		Form Completed By:	
Latitude:		Rainfall (in.)	
Longitude:		Last 24 hours:	
No. of Photos:		Last 48-hours:	
Land Use in Drainage Area (Check all that apply):			
Industrial	<input type="checkbox"/>		
Commerical	<input type="checkbox"/>		
Residential	<input type="checkbox"/>		
Open Space	<input type="checkbox"/>		
Institutional	<input type="checkbox"/>		
Other	<input type="checkbox"/>		
Known Industries			

Section 2 Outfall Description

Outfall Submerged in Water:	(Check one)	Outfall With Sediment	(Check one)
No	<input type="checkbox"/>	No	<input type="checkbox"/>
Partially	<input type="checkbox"/>	Partially	<input type="checkbox"/>
Fully	<input type="checkbox"/>	Fully	<input type="checkbox"/>
Stream Flow Present		Flow Description	
Yes	<input type="checkbox"/>	Trickle	<input type="checkbox"/>
No	<input type="checkbox"/>	Moderate	<input type="checkbox"/>
		Substantial	<input type="checkbox"/>

Section 3: Quantitative Characterization

Field Data for Flowing Outfalls

Parameter	Result	Unit	Equipment
Volume		litre	Bottle
Time to Fill		Sec	Stop Watch
Flow Depth	____' ____"	Ft, In	Tape Measure
Flow Width	____' ____"	Ft, In	Tape Measure
Measured Length	____' ____"	Ft, In	Tape Measure
Time of Travel		Sec	Stop Watch
Temperature		F	Thermometer
pH		pH Units	Test Strip/Probe
Ammonia		mg/l	Test Strip/Probe



Outfall Reconnaissance Inventory Field Sheet

Section 4: Physical Indicators for Flowing Outfalls Only:

Are Any Physical Indicators Present in Flow? Yes No *(If No, Skip to Section 5)*

Indicator	Check if Present	Description	Relative Severity Index (1-3)		
Odor	<input type="checkbox"/>	<input type="checkbox"/> Sewage <input type="checkbox"/> Rancid/Sour <input type="checkbox"/> Petroleum/Gas <input type="checkbox"/> Sulfide <input type="checkbox"/> Other	<input type="checkbox"/> 1-Faint	<input type="checkbox"/> 2-Easily Detected	<input type="checkbox"/> 3- Noticeable from a distance
Color	<input type="checkbox"/>	<input type="checkbox"/> Clear <input type="checkbox"/> Brown <input type="checkbox"/> Gray <input type="checkbox"/> Yellow <input type="checkbox"/> Green <input type="checkbox"/> Orange <input type="checkbox"/> Red <input type="checkbox"/> Other	1-Faint colors in <input type="checkbox"/> Sample Bottle	2-Clearly visible in <input type="checkbox"/> sample bottle	3- Clearly visible in outfall <input type="checkbox"/> flow
Turbidity	<input type="checkbox"/>	_____ ntu (If Measured)	<input type="checkbox"/> 1-Slight Cloudiness	<input type="checkbox"/> 2-Cloudy	<input type="checkbox"/> 3- Opaque
Floatables - Does Not Include Litter	<input type="checkbox"/>	<input type="checkbox"/> Sewage (Toilet Paper, etc) <input type="checkbox"/> Suds <input type="checkbox"/> Petroleum (oil sheen) <input type="checkbox"/> Other	<input type="checkbox"/> 1-Few/Slight, origin not obvious	<input type="checkbox"/> 2-Some indications of origin (I.e. possible suds or oil sheen)	<input type="checkbox"/> 3- Origin Obvious (I.e. obvious oil sheen, suds, or floating sanitary materials)

Section 5: Physical Indicators for Both Flowing and Non-Flowing Outfalls

Are physical indicators that are not related to flow present? Yes No *(If No, Skip to Section 6)*

Indicator	Check if Present	Description	Comments
Deposits/ Stains	<input type="checkbox"/>	<input type="checkbox"/> Oily <input type="checkbox"/> Stain Flow Line <input type="checkbox"/> Paint <input type="checkbox"/> Other	
Abnormal Vegetation	<input type="checkbox"/>	<input type="checkbox"/> Excessive <input type="checkbox"/> Inhibited	
Poor Pool Quality	<input type="checkbox"/>	<input type="checkbox"/> Odors <input type="checkbox"/> Colors <input type="checkbox"/> Oil Sheen <input type="checkbox"/> Other <input type="checkbox"/> Suds <input type="checkbox"/> Excessive Algae <input type="checkbox"/> Floatables	
Pipe Benthic Growth	<input type="checkbox"/>	<input type="checkbox"/> Brown <input type="checkbox"/> Orange <input type="checkbox"/> Green <input type="checkbox"/> Other	

Section 6: Overall Outfall Characterization

<input type="checkbox"/> Unlikely	<input type="checkbox"/> Potential (presence of two or more indicators)	<input type="checkbox"/> Suspect (one or more indicators w/ a severity of 3)	<input type="checkbox"/> Obvious
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Section 7: Data Collection

Sample for Lab?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
If yes, collected from:	<input type="checkbox"/> Flow	<input type="checkbox"/> Pool	
Intermittent flow trap set?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

Section 8: Any Non-Illicit Discharge Concerns (I.e., Trash or required infrastructure repairs)?

List Concerns:



City of St. Peters

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

APPENDIX C

**EPA 833-F-00-007 DOCUMENT
"STORMWATER PHASE II FINAL RULE"**



Stormwater Phase II Final Rule

Illicit Discharge Detection and Elimination Minimum Control Measure

Stormwater Phase II Final Rule Fact Sheet Series

Overview

1.0 – Stormwater Phase II Final Rule: An Overview

Small MS4 Program

2.0 – Small MS4 Stormwater Program Overview

2.1 – Who's Covered? Designation and Waivers of Regulated Small MS4s

2.2 – Urbanized Areas: Definition and Description

Minimum Control Measures

2.3 – Public Education and Outreach

2.4 – Public Participation/ Involvement

2.5 – Illicit Discharge Detection and Elimination

2.6 – Construction Site Runoff Control

2.7 – Post-Construction Runoff Control

2.8 – Pollution Prevention/Good Housekeeping

2.9 – Permitting and Reporting: The Process and Requirements

2.10 – Federal and State-Operated MS4s: Program Implementation

Construction Program

3.0 – Construction Program Overview

3.1 – Construction Rainfall Erosivity Waiver

Industrial "No Exposure"

4.0 – Conditional No Exposure Exclusion for Industrial Activity

This fact sheet profiles the Illicit Discharge Detection and Elimination minimum control measure, one of six measures the operator of a Phase II regulated small municipal separate storm sewer system (MS4) is required to include in its stormwater management program to meet the conditions of its National Pollutant Discharge Elimination System (NPDES) permit. This fact sheet outlines the Phase II Final Rule requirements and offers some general guidance on how to satisfy them. It is important to keep in mind that the small MS4 operator has a great deal of flexibility in choosing exactly how to satisfy the minimum control measure requirements.

What Is An "Illicit Discharge"?

Federal regulations define an illicit discharge as "...any discharge to an MS4 that is not composed entirely of stormwater..." with some exceptions. These exceptions include discharges from NPDES-permitted industrial sources and discharges from fire-fighting activities. Illicit discharges (see Table 1) are considered "illicit" because MS4s are not designed to accept, process, or discharge such non-stormwater wastes.

Why Are Illicit Discharge Detection and Elimination Efforts Necessary?

Discharges from MS4s often include wastes and wastewater from non-stormwater sources. A study conducted in 1987 in Sacramento, California, found that almost one-half of the water discharged from a local MS4 was not directly attributable to precipitation runoff. A significant portion of these dry weather flows were from illicit and/or inappropriate discharges and connections to the MS4.

Illicit discharges enter the system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drains) or indirect connections (e.g., infiltration into the MS4 from cracked sanitary systems, spills collected by drain outlets, or paint or used oil dumped directly into a drain). The result is untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria to receiving waterbodies. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic, wildlife, and human health.

Table 1

Sources of Illicit Discharges
Sanitary wastewater
Effluent from septic tanks
Car wash wastewaters
Improper oil disposal
Radiator flushing disposal
Laundry wastewaters
Spills from roadway accidents
Improper disposal of auto and household toxics

What Is Required?

Recognizing the adverse effects illicit discharges can have on receiving waters, the Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement and enforce an illicit discharge detection and elimination program. This program must include the following:

- A storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;
- Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, Tribal, or local law) on non-stormwater discharges into the MS4, and appropriate enforcement procedures and actions;
- A plan to detect and address non-stormwater discharges, including illegal dumping, into the MS4;
- The education of public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and
- The determination of appropriate best management practices (BMPs) and measurable goals for this minimum control measure. Some program implementation approaches, BMPs (i.e., the program actions/activities), and measurable goals are suggested below.

Does This Measure Need to Address All Illicit Discharges?

No. The illicit discharge detection and elimination program does not need to address the following categories of non-stormwater discharges or flows unless the operator of the regulated small MS4 identifies them as significant contributors of pollutants to its MS4:

- Water line flushing;
- Landscape irrigation;
- Diverted stream flows;
- Rising ground waters;
- Uncontaminated ground water infiltration;
- Uncontaminated pumped ground water;
- Discharges from potable water sources;
- Foundation drains;
- Air conditioning condensation;
- Irrigation water;
- Springs;
- Water from crawl space pumps;

- Footing drains;
- Lawn watering;
- Individual residential car washing;
- Flows from riparian habitats and wetlands;
- Dechlorinated swimming pool discharges; and
- Street wash water.

What Are Some Guidelines for Developing and Implementing This Measure?

The objective of the illicit discharge detection and elimination minimum control measure is to have regulated small MS4 operators gain a thorough awareness of their systems. This awareness allows them to determine the types and sources of illicit discharges entering their system; and establish the legal, technical, and educational means needed to eliminate these discharges. Permittees could meet these objectives in a variety of ways depending on their individual needs and abilities, but some general guidance for each requirement is provided below.

The Map

The storm sewer system map is meant to demonstrate a basic awareness of the intake and discharge areas of the system. It is needed to help determine the extent of discharged dry weather flows, the possible sources of the dry weather flows, and the particular waterbodies these flows may be affecting. An existing map, such as a topographical map, on which the location of major pipes and outfalls can be clearly presented demonstrates such awareness.

EPA recommends collecting all existing information on outfall locations (e.g., review city records, drainage maps, storm drain maps), and then conducting field surveys to verify locations. It probably will be necessary to walk (i.e., wade through small receiving waters or use a boat for larger waters) the streambanks and shorelines for visual observation. More than one trip may be needed to locate all outfalls.

Legal Prohibition and Enforcement

EPA recognizes that some permittees may have limited authority under State, Tribal or local law to establish and enforce an ordinance or other regulatory mechanism prohibiting illicit discharges. In such a case, the permittee is encouraged to obtain the necessary authority, if possible.

The Plan

The plan to detect and address illicit discharges is the central component of this minimum control measure. The plan is dependant upon several factors, including the permittee's available resources, size of staff, and degree and character of its illicit discharges. As guidance only, the four steps of a recommended plan are outlined below:

1 Locate Problem Areas

EPA recommends that priority areas be identified for detailed screening of the system based on the likelihood of illicit connections (e.g., areas with older sanitary sewer lines). Methods that can locate problem areas include: visual screening; water sampling from manholes and outfalls during dry weather; the use of infrared and thermal photography, cross-training field staff to detect illicit discharges, and public complaints.

2 Find the Source

Once a problem area or discharge is found, additional efforts usually are necessary to determine the source of the problem. Methods that can find the source of the illicit discharge include: dye-testing buildings in problem areas; dye- or smoke-testing buildings at the time of sale; tracing the discharge upstream in the storm sewer; employing a certification program that shows that buildings have been checked for illicit connections; implementing an inspection program of existing septic systems; and using video to inspect the storm sewers.

3 Remove/Correct Illicit Connections

Once the source is identified, the offending discharger should be notified and directed to correct the problem. Education efforts and working with the discharger can be effective in resolving the problem before taking legal action.

4 Document Actions Taken

As a final step, all actions taken under the plan should be documented. This illustrates that progress is being made to eliminate illicit connections and discharges. Documented actions should be included in annual reports and include information such as: the number of outfalls screened; any complaints received and corrected; the number of discharges and quantities of flow eliminated; and the number of dye or smoke tests conducted.

Educational Outreach

The Center for Watershed Protection and Robert Pitt (2004) researched the most cost-effective and efficient techniques that can be employed to identify and correct inappropriate discharges. Data from Montgomery County, Maryland, was analyzed and it was determined that staff identify and correct about six inappropriate discharges per year as a result of regular screening. By contrast, over 185 inappropriate discharges are corrected each year in Montgomery County as a direct result of citizen complaints and calls to a storm water compliant hotline. Public education and labeling of outfalls and other storm drain infrastructure is an important element of establishing a successful citizen hotline. Outreach to public employees, businesses, property owners, the general public, and elected officials regarding ways to detect and eliminate illicit discharges is an integral part of this minimum measure.

Suggested educational outreach efforts include:

- Developing *informative brochures, and guidances* for specific audiences (e.g., carpet cleaning businesses) and school curricula;
- Designing a program to *publicize and facilitate public reporting* of illicit discharges;
- *Coordinating volunteers* for locating, and visually inspecting, outfalls or to stencil storm drains; and
- Initiating *recycling programs* for commonly dumped wastes, such as motor oil, antifreeze, and pesticides.

What Are Appropriate Measurable Goals?

Measurable goals, which are required for each minimum control measure, are intended to gauge permit compliance and program effectiveness. The measurable goals, as well as the BMPs, should reflect the needs and characteristics of the operator and the area served by its small MS4. Furthermore, they should be chosen using an integrated approach that fully addresses the requirements and intent of the minimum control measure.

EPA has developed a Measurable Goals Guidance for Phase II MS4s that is designed to help program managers comply with the requirement to develop measurable goals. The guidance presents an approach for MS4 operators to develop measurable goals as part of their stormwater management plan. For example, an MS4 could establish a measurable goal of responding to all complaints received by the citizen complaint hotline within 24 hours to minimize water quality impacts or recurrent dumping. A complaint tracking system could be used to log response and enforcement activity.

The educational outreach measurable goals for this minimum control measure could be combined with the measurable goals for the Public Education and Outreach minimum control measure (see Fact Sheet 2.3).

Sources

Center for Watershed Protection and R. Pitt. 2004. Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments. Center for Watershed Protection, Ellicott City, MD, and University of Alabama, Birmingham, AL.

Maryland Department of the Environment, Water Management Administration. 1997. *Dry Weather Flow and Illicit Discharges in Maryland Storm Drain Systems*. Baltimore, Maryland.

U.S. EPA Office of Water. 1993. *Investigation of Inappropriate Pollutant Entries into Storm Drainage Systems: A User's Guide*. EPA/600/R-92/238. Washington, D.C.

Wayne County Rouge River National Wet Weather Demonstration Project. 1997. *Guidance for Preparing a Program for the Elimination of Illicit Discharges*. Wayne County, Michigan.

For Additional Information

Contacts

☞ U.S. EPA Office of Wastewater Management
<http://www.epa.gov/npdes/stormwater>
Phone: 202-564-9545

☞ Your NPDES Permitting Authority. Most States and Territories are authorized to administer the NPDES Program, except the following, for which EPA is the permitting authority:

Alaska	Guam
District of Columbia	Johnston Atoll
Idaho	Midway and Wake Islands
Massachusetts	Northern Mariana Islands
New Hampshire	Puerto Rico
New Mexico	Trust Territories
American Samoa	

☞ A list of names and telephone numbers for each EPA Region and State is located at <http://www.epa.gov/npdes/stormwater> (click on “Contacts”).

Reference Documents

☞ EPA's Stormwater Web Site
<http://www.epa.gov/npdes/stormwater>

- Stormwater Phase II Final Rule Fact Sheet Series
- Stormwater Phase II Final Rule (64 FR 68722)
- National Menu of Best Management Practices for Stormwater Phase II
- Measurable Goals Guidance for Phase II Small MS4s
- Stormwater Case Studies
- And many others

☞ Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments
http://www.cwp.org/idde_verify.htm

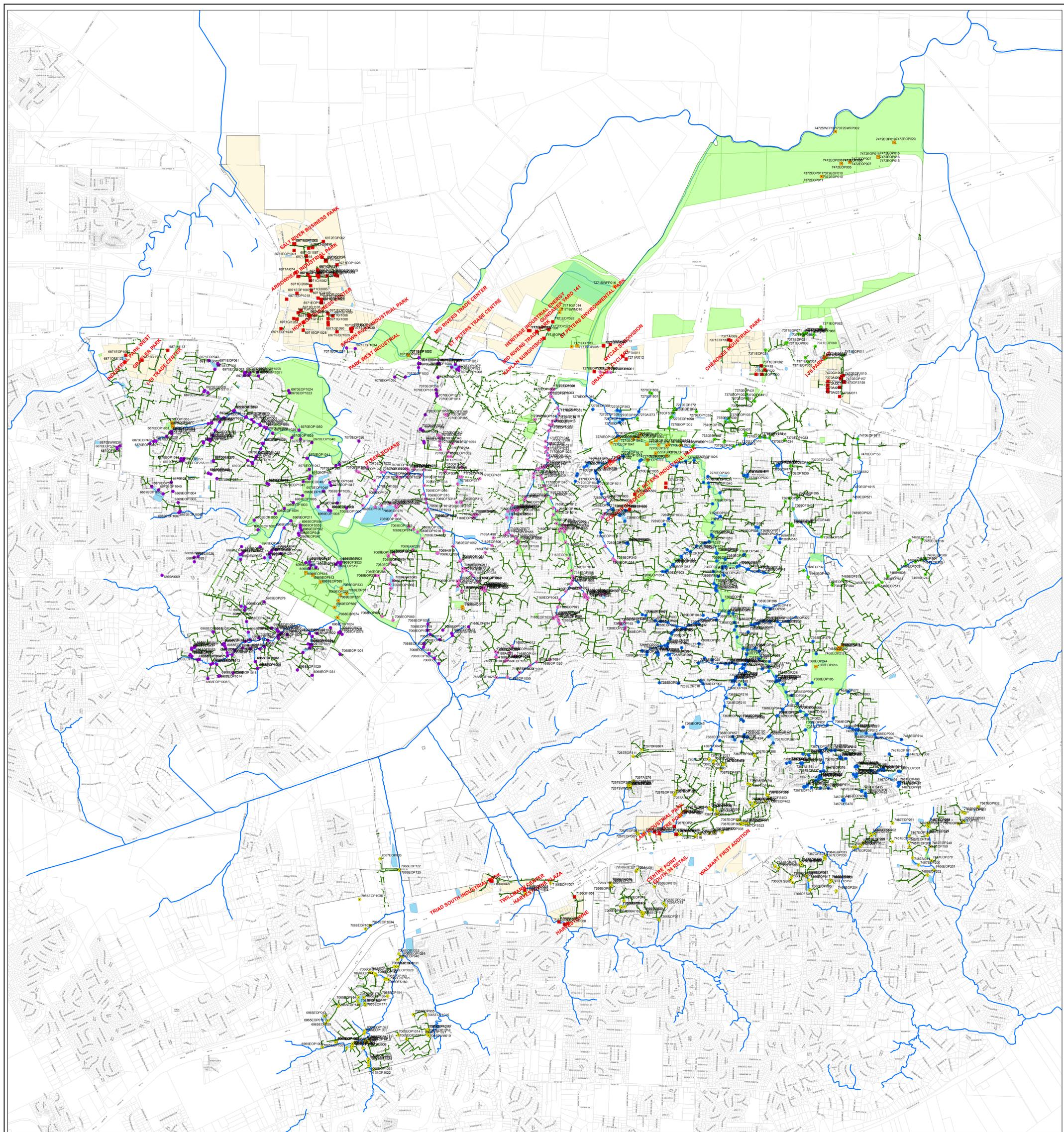


City of St. Peters

ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

APPENDIX D

STORM WATER MAP



Illicit Discharge and Detection Elimination Plan Inspection Locations

Legend

- High Priority Annual Inspection of areas zoned I-1 or I-2
- High Priority Annual Inspection on City-Owned Property
- EOP in Inspection Cycle A
- EOP in Inspection Cycle B
- EOP in Inspection Cycle C
- EOP in Inspection Cycle D
- EOP in Inspection Cycle E
- Stream
- City-owned parcels
- Detention Basin
- Parcels zoned I-1 or I-2
- City Boundary

Revised: 12/30/2011

