

# Appendix C

## Illicit Discharge Detection and Elimination

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The Illicit Discharge Detection and Elimination Program is required under S5~~(B)(3)~~B.3 of the Eastern Washington Phase II Municipal Stormwater Permit. The IDDE Program requirements for secondary permittees are in section S6~~(D)(3)~~D.3 of the permit.

An illicit discharge is defined as any discharge to the storm sewer system that is not composed entirely of stormwater. Illicit discharges may come from an illegal connection to the storm sewer, spills or intentional dumping of wastewater or pollutants into a storm drain.

### Objective:

The primary objective is to eliminate illicit discharges to surface water and groundwater. This will be accomplished through detection of illicit discharges, the removal of illicit connections, stormwater education, and enforcement of the local stormwater regulations.

### Performance Measures (IDDE Program Elements):

#### 1. Storm Inventory & Maps

Each jurisdiction uses GIS to maintain a map of the storm sewer system. Beginning August 21, 2021 all permittees ~~are~~were required to maintain maps of their storm sewer system in an electronic format with fully described mapping standards. Mapping standards for each jurisdiction will be included in Attachment C-1A. Secondary permittees will maintain a storm sewer system map. The preferred mapping format for secondary permittees is an electronic format. ~~Maps maintained by the jurisdictions will be updated to meet the requirements of the new permit by August 1, 2023~~

These maps will include the following elements:

- i. Known outfalls and known discharge points
  - a. For all known MS4 outfalls, the following attributes shall be mapped: size and material, where known. Records shall be updated.
- ii. Receiving waters, other than the ground
- iii. Areas served by the MS4 that discharge to the ground
- iv. Permanent stormwater facilities owned or operated by the Permittee
- v. All Connections to the MS4 authorized or approved by the permittee after August 1, 2019.
- vi. All known connections from the MS4 to a privately-owned stormwater system. Permittees are not required to map residential connections to the MS4, including individual driveways, sump pumps, or roof downspouts.
- vii. Connections between the MS4 owned and operated by the Permittee and other municipalities or public entities
- viii. No later than March 31, 2026, Permittees shall submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. Report the size and material of the outfalls, where known.
- ix. No later than December 31, 2026, using available, existing data, the Permittee shall map tree canopy to support stormwater management on Permittee-owned properties. Permittees shall develop a and follow a

methodology to intentionally identify canopy for stormwater management purposes, which may be updated annually or as needed.

- x. No later than December 31, 2027, Permittees shall map tributary conveyances to known outfalls and discharge points with a 24-inch nominal diameter or larger, or an equivalent cross-sectional area for non-pipe systems. The follow features or attributes (or both) shall be mapped:
  - a. Tributary conveyance type, material, and size, where known.
  - b. Associated drainage areas
  - c. Land use
- xi. No later than December 31, 2028, using available, existing data, map overburdened communities in relation to permanent stormwater facilities owned or operated by the Permittee, outfalls, discharge points, and tree canopy on Permittee-owned or operated properties.
- viii-xii. Permittees shall, upon request and the extent consistent with national security laws and directives, provide maps and mapping information to Ecology, other entities covered under this permit, other municipalities, and/or federally-recognized Indian Tribes.

Secondary permittees will maintain a storm sewer map that will include the following elements:

- i. Locations of all known storm drain outfalls and discharge points
- ii. Label the receiving waters other than the ground
- iii. Delineate the area contributing runoff- to each outfall and discharge point
- iv. No later than December 31, 2026, the required format for mapping is an electric format with fully described mapping standards.
- iii-v. No later than March 31, 2027 submit locations of all known MS4 outfalls according to the standard templates and format provided in the Annual Report. The reporting shall include the size and material of the outfalls.

## 2. Local Regulation

Each local jurisdiction has adopted an ordinance or resolution to prohibit illicit discharges, including discharges occurring on private property and authorize enforcement action For more information on the jurisdiction, specific Illicit Discharge Detection and Elimination ordinances, please refer to the following local codes:

- Chelan County Code Chapter 13.14 (Resolution No. 2019-52)
- Douglas County Code Title 19.44 (Ordinance No. TLS 19-16-41B)
- East Wenatchee City Code 13.20 (Ordinance No. 09-14)
- Wenatchee City Code 4.10 (Ordinance No. 2018-38)

The local regulations will be updated to meet the new permit requirements before ~~February 2, 2023~~ July 1, 2027.

Based on the local ordinance or resolution an IDDE Response Plan has been developed. The plan includes:

- i. An enforcement matrix/flow chart
- ii. Escalating enforcement actions including:
  - a. Verbal/Written Warning
  - b. Administrative Action
  - c. Administrative Action with Fine and/or Cost Recovery

#### d. Legal Action

The complete IDDE response Procedures can be found in [Appendix A Attachment C-2](#). Secondary permittees will implement policies to prohibit illicit discharges and ensure compliance with the local IDDE ordinances or resolutions. This policy will include and enforcement plan to ensure compliance. They will also implement a spill response plan that includes coordination with qualified spill responders.

### 3. Detection and Identification of Illicit Discharges and Connections

Illicit discharges and connections will continue to be detected through field assessments, the investigation of complaints, and from monitoring data. The local jurisdiction will respond to potential illicit discharges within 7 days. Potential illicit connections to the storm sewer system must be investigated no later than 21 days from the time of the initial report or discovery.

#### 3.1. Priority Areas

The local agencies have determined priority areas likely to have illicit discharges based on the following criteria:

- i. Land use and associated business/industrial activities that may cause illicit discharges
- ii. Past illicit discharge incidents and reports received
- iii. Areas with storage or large quantities of material or hazardous substances that could result spills and negative environmental impacts

The list of priority areas is periodically reviewed and updated as needed. Field surveys are conducted based on the list of priority areas and outfalls. [The outfall priority list is located in Attachment C-3.](#)

#### 3.2. Field Assessments

Field assessments are conducted to include evaluating outfalls, discharge [points, and](#) priority areas. These assessments should occur during dry weather to detect any potential illicit discharges and will be scheduled based on a prioritized list. Recordkeeping in the field is done using either a field logbook or an inspection report form. Inspection forms may also be completed in a digital format. The jurisdiction may also use an electronic database to track inspection information. Reports include information on suspected illicit discharges, the date, time, location, observations, test results, and if a sample was collected for further analysis.

#### 3.3. Stormwater Hotline

Each jurisdiction will continue to maintain and publicize a telephone number for the public reporting of spills and other illicit discharges. In Wenatchee the phone number is 888-3235, in Chelan County the number is 667-6415, in Douglas County the number to call is 884-7173, and in East Wenatchee the number to call is 884-1829. These phone numbers are publicized using the following methods: websites, brochures, phone book, and public outreach materials like refrigerator magnets.

### 3.4. Public Education

As part of the Public Involvement, Education, and Outreach plan, a list of target audiences and relevant topics was developed. The list can be found in WWSWMP Appendix B.

## 4. Illicit Discharge Elimination Program

Each jurisdiction has implemented an IDDE program to address illicit discharges, including spills, and illicit connections to the stormwater system. The program outlines steps to take to characterize the nature of the discharge, to trace the source to eliminate the discharge. The primary difference in the plans is the enforcement action allowed under the local regulations. The complete IDDE Response Procedures for each jurisdiction can be found in [Appendix A Attachment C-4](#).

Per the permit, any illicit discharge into a stormwater system which could constitute a threat to human health, welfare or the environment will be investigated immediately and the appropriate action taken to correct or minimize the threat. The response may include referral of the violation to another appropriate agency such as the local emergency response team or the Department of Ecology.

The local jurisdictions will investigate any complaints or reports of potential illicit discharges within 7 days. Potential illicit connections to the storm sewer system will be investigated no later than 21 days from the time of the initial report or discovery. Upon confirmation of an illicit connection the local jurisdiction will work with the responsible party to have the connection eliminated within 6 months.

## 5. Training

IDDE program training is provided to all municipal staff including office and field staff. Follow-up training is provided as needed for new staff members and to address changes in procedures.

- i. Stormwater utility and code enforcement staff are provided training to identify, investigate, terminate, cleanup, and report illicit discharges including spills, and illicit connections.
- ii. Office staff is provided training on procedures for documenting an incident of complaint.
- iii. Other municipal staff including but not limited to road maintenance crews and building inspectors is provided training on identifying spills and illicit discharges and the proper procedures for reporting and documenting
- iv. The local jurisdictions have also coordinates with the fire departments and DOE for emergency spill response of hazardous materials.

## 6. Recordkeeping

Each jurisdiction maintains records of all field assessments, complaints, spills, suspected illicit discharges, illicit connections, and investigations using the procedures outlines in the IDDE Response Plan. In the Annual Report, each permittee shall submit data for the illicit discharges, spills, and illicit connections, including those that were found by, reported to, or investigated by the permittee during the previous calendar year. The data shall include the information specified in Appendix 7 of the permit and WQWebIDDE Records are kept on training that was offered and a

list of staff members who attended.

*Timelines listed in this section of the permit:*

- March 31, 2026: Submit locations of all known MS4 outfalls according to the standard templates in the Annual Report (S5.B.3.a.viii)
- December 31, 2026: Map tree canopy on Permittee-owned property (S5.B.3.a.ix)
- January 1, 2027: Update and implement procedures to minimize discharges to the MS4 during post-emergency clean up
- July 1, 2027: Regulatory mechanisms updated if necessary (S5.B.3.b)
- December 31, 2027: Map tributary conveyance systems to all known outfalls and discharge points (S5.B.3.a.x)
- December 31, 2028: Map overburdened communities in relation to permanent stormwater facilities owned or operated by the Permittee, outfalls, discharge points, and tree canopy on Permittee owned Property. (S5.B.3.xii)
- ~~March 31, 2024: Total percentage of MS4 assessed must be reported to Ecology (S5.B.3.c.iv)~~

Attachments:

Attachment A — Mapping Standards

Appendix C-1: City of Wenatchee IDDE Response Procedure

Attachment C-1: City of Wenatchee Mapping Standards

Attachment C-2: IDDE Enforcement Flow Chart

Attachment C-3: City of Wenatchee Priority Areas & Outfalls

Attachment C-4: Stormwater Complaint Form

Attachment C-5: Chain of Custody

Attachment C-6: Notice of Non-Compliance