

MCM #3 - Illicit Discharge Detection and Elimination

The Municipal Separate Storm Sewer System Program

This factsheet is part of our Municipal Separate Storm Sewer System (MS4) series.

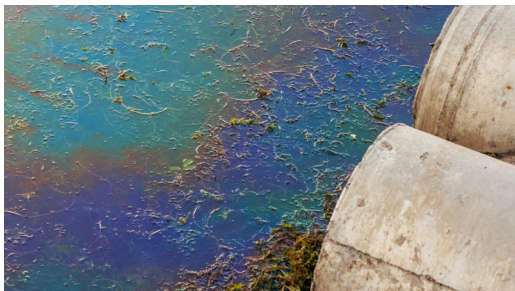
To access this series and many other educational resources, please visit: spcwater.org.

There are 6 Best Management Practices (BMPs) required under this MCM. Learn more about their requirements, and resources to help meet these requirements below.

BMP #1

Develop, implement, and enforce a written program for the detection, elimination, and prevention of illicit discharges into your regulated small MS4. Your program should include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results should be used as indicators of possible discharge sources. The program must include the following:

- Procedures for identifying priority areas
- Procedures for screening outfalls in priority areas during varying seasonal and meteorological conditions
- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected
- Procedures of eliminating an illicit discharge
- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems
- Mechanisms for gaining access to private property to inspect outfalls
- Procedures for evaluation, program documentation, and assessment
- Procedures for addressing complaints received from the public.



Some common sources of illicit discharges include fryer oil from restaurants, car wash wastewater, and septic tank effluent. Unusual colors, odors, or flow volumes may be indicators of illicit discharges.

BMP #2

Develop and maintain map(s) of your regulated small MS4, that includes permit boundaries, urbanized area boundaries, location of all outfalls, and location and names of all surface waters that receive discharges from those outfalls. Surface waters that should be included are creeks, streams, ponds, lakes, basins, swales, and channels that receive stormwater discharges. Outfalls should have unique names to assist in record-keeping. These maps should be updated and maintained annually.

Illicit Discharge Detection and Elimination

is one of the 6 Minimum Control Measures (MCMs) required under the small MS4 program. The goal of the Illicit Discharge Detection and Elimination (IDD&E) is to reduce pollution in our waterways through the removal of non-stormwater contributions to the storm sewer system. Common sources of illicit discharges include sanitary wastewater, improper disposal of auto and household toxins, and car wash wastewaters.

Why are illicit (illegal) discharges important?

Illicit discharges make their way to our waterways untreated. Illicit discharges such as paint or oil dumped into storm drains, septic effluent, car wash wastewater, and wastewater piping connected illegally can cause serious pollution issues. These illicit discharges can carry a variety of pollutants, such as:

- Heavy metals
- Nutrients
- Bacteria
- Oil/Grease
- Viruses
- Solvents

BMP #3

In conjunction with the map created under BMP #2, you must map the entire storm sewer collection system including roads, inlets, piping, swales, catch basins, channels, basin, and any other features of the system including privately owned parts of the collection system that receive stormwater flows from publicly owned areas. These maps should be updated and maintained annually.

BMP #4

Conduct dry-weather screenings of MS4 outfalls to evaluate the presence of illicit discharges. If illicit discharge is present, identify the source(s) of any illicit discharges and remove or correct any illicit discharges. Any known illicit discharge that would endanger users downstream must be reported immediately to DEP. Dry-weather screening must be conducted on all MS4 outfalls at least twice within the 5-year permit period for new permittees, and at least once for existing permittees by March 15, 2023. Known problem outfalls must be screened annually.



BMP #5

Enact a stormwater management ordinance or SOP to implement and enforce a stormwater management program that includes the prohibition of non-stormwater discharged to the regulated small MS4. Ordinances associated with an Act 167 Stormwater Management Plan that were approved by PA DEP in 2005 or later meet the requirements of BMP #5. You can also meet the ordinance requirement by utilizing [PA DEP's Model MS4 Stormwater Management Ordinance](#) or by developing an ordinance that meets all applicable requirements outlined in the [MS4 Stormwater Management Ordinance Checklist](#). This ordinance must be submitted to DEP.



MCM #3 under the MS4 program requires regular screening of stormwater outfalls to detect any illicit discharges.

BMP #6

Provide educational outreach to public employees, business owners and employees, property owners, the general public, and elected officials about the program to detect and eliminate illicit discharges. Educational outreach should be distributed annually to the target audiences by the methods outlined in MCM #1 Public Education/Outreach. Programs should encourage and facilitate public reporting of illicit discharges, illegal dumping, or outfall pollution.



**For more information
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