

# MS4 Illicit Discharge Detection & Elimination Program (IDD&E)

## Purpose and Scope

West Chester University is working jointly with the Department of Environmental Protection (DEP) to reduce the quantity and increase the quality of stormwater runoff. This program will provide the opportunity for student groups and local organizations to have active involvement with our Multiple Separate Storm System (MS4) operation and help reduce the discharge of pollutants contained in stormwater runoff.

The purpose of this program is to provide for the health, safety, and general welfare of the students, staff and visitors of West Chester University 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.

Staff, students, and any on-campus business is responsible for identification of illicit discharge detection.

## Requirements

This program initiated the process for identifying and contacting the appropriate public groups on and near the West Chester University campus. The requirements are as follows:

### *BMP#1*

- Develop and implement a written IDD&E program for the detection, elimination, and prevention of illicit discharges into your MS4.

### *BMP#2*

- Map streams and outfalls.
  - This map can be combined with BMP #3.
  - The map must show the location of all outfalls and the locations and names of all surface waters of the Commonwealth 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.
  - Maps should be developed within the first year of permit coverage and updated/maintained from thereafter.

### *BMP#3*

- Map storm sewer collection system including pipes, municipal watershed boundaries and roads (including streets, catch basins, curbs, basins and artificial channels)
  - This map can be created in conjunction with BMP #2.

### *BMP#4*

- Outfall screenings must be done in your MS4.
  - "Screening" means that you physically check your outfalls and report the results as outlined in your SWMP.
  - Documentation is key – write down who went, what they found, include their inspection checklist and any photos taken.

- New permittees need to screen each outfall twice (screen 40% of outfalls each year of the permit term).
- During subsequent permit terms, outfalls are to be screened once per permit term (screen 20% of outfalls each year).

#### *BMP#5*

- Enact a stormwater management ordinance to implement and enforce a SWMP.
  - Sections that should be included are prohibitions, right of entry, and enforcement.

#### *BMP#6*

- Provide educational outreach on IDD&E to your target audience.
  - Programs should be developed to encourage and facilitate public reporting of illicit discharges, illegal dumping, or outfall pollution.

## Procedures

### *Storm Sewer System Map*

The Environmental Health and Safety (EHS) department maintains electronic maps of all West Chester University storm sewer systems. Maps contain locations of streams, outfalls, inlets, pipes, ponds, retention basins and more. Maps are reviewed and/or updated annually.

### *Outfall Screening*

Plum Run Stream and outfalls are inspected annually by EHS. Inspections are done following periods of dry weather, which ensures that flow in streams will be minimal, and any illicit discharge pollution will be more highly concentrated and easier to detect. If dry weather flow is present in outfalls and indicators are present than samples will be collected and tested.

The person inspecting the outfalls and creeks checks for color, vegetation growth, odor, unusual materials in the water, and structural integrity.

### *Stormwater Discharge Prohibitions*

No university employee, student, visitor, or contractor shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw, drain, or otherwise discharge into the university's storm water drainage system any pollutants or waters containing any pollutants, other than storm water. The Environmental Health and Safety Office (EHS) and Facilities Management work cooperatively to prevent, identify, and respond to illicit discharges.

The following discharges are prohibited from West Chester University stormwater system:

- Petroleum products and petroleum derivatives
- Food, kitchen waste, and cooking grease
- Dishwater, laundry, and housekeeping wash water
- Equipment wash water (including cement truck rinse water)
- Chemical waste
- Animal fecal waste from laboratory animal facilities
- Steam condensate or any other heated water
- Contact cooling water and chilled water
- Floor drain water from areas containing machinery or maintenance shops
- Air conditioner condensate that has been treated with biocides

- Water from crawlspace pumping
- Water from sanitary sewer lines

### *Notification of Spill*

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 waters of the United States, said person shall take all necessary steps to ensure the discovery, containment, mitigation, and proper reporting of such release. Failure to provide notification of a release as provided above is a violation of this program.

In the event of a suspected release of unknown or hazardous materials, the person identifying the release shall immediately notify EHS or University Police, who will then contact EHS. EHS will coordinate all ensuing investigation, emergency response, and remediation activities. This often involves partnering with other university departments like Grounds, Energy Services or Facilities Services, and sometimes also with non-university organizations such as the Brandywine Red Clay Alliance and West Chester Borough. EHS is responsible for reporting emergency illicit discharges to the DEP.

In the event of a release of non-hazardous materials, the person identifying the release shall notify EHS by phone or email, or by calling University Police, who in turn will contact EHS. Incidents and concerns can also be reported online. EHS will investigate all reported non-hazardous releases to storm sewers.

### *Compliance*

- The university may suspend or cease activities and operations that are not in full compliance with this program.
- Whenever West Chester University finds that a violation of this program has occurred, EHS may order compliance by written notice to the responsible person. Such notice may require, without limitation:
  - The performance of monitoring, analyses, and reporting.
  - The elimination of prohibited discharges or connections.
  - Cessation of any violating discharges, practices, or operations.
  - The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property.
  - Payment of any fee, penalty, or fine assessed against the university to cover remediation cost.
  - The implementation of new storm water management practices; and
  - Disciplinary action up to and including dismissal, where appropriate.
- Such notification shall set forth the nature of the violation(s) and establish a time limit for correction of these violation(s). Said notice may further advise that, if applicable, should the violator fail to take the required action within the established deadline. EHS will then initiate work orders for the appropriate corrective actions and the violator or university department will be charged for the cost.

- The remedies listed in this program are not exclusive of any other remedies available under any applicable federal, state, or local law.

#### *Effective Date, Review and Approval*

This program will become effective upon the date of approval by the VP for Administration and Finance. This program, and any related procedures, shall be reviewed annually.

#### *Education and Outreach*

WCU through the department of EHS will provide education to the general public within the MS4 area about the hazards associated with illicit discharges and the improper disposal of waste. EHS will distribute information through digital displays, newsletters, website, newspaper articles, etc. EHS will continue to develop and review which communication tools are most effective as the public education and outreach and public participation program evolves.

#### Contact:

For additional information, contact Environmental Health and Safety:

- Email: [ehs@wcupa.edu](mailto:ehs@wcupa.edu)
- Office: 610-436-3333

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