

## CITY OF HARTFORD

# ILLICIT DISCHARGE DETECTION & ELIMINATION PLAN

### Introduction and Initial Field Screening Efforts:

In 2008 the City of Hartford identified all major storm sewer outfall points. This activity was completed to fulfill a portion of the Illicit Discharge Detection and Elimination requirement of the City's WPDES Permit (No. WI-S050075-1). Initial Inspection efforts did not disclose any illicit discharge.

A color-coded map dividing the City into three Aldermanic Districts was developed showing the location of all outfalls and storm sewer inspection sites.

### On-Going Dry Weather & Wet Weather Field Screening:

All of the outfalls serving the City will be inspected annually. One of the three storm sewer districts will be maintained and any necessary repairs made each year.

Inspection, repair and maintenance records will be maintained. The City's storm sewer district maps will identify all outfalls and storm sewers that will be evaluated.

### Authorized Enforcement Agency:

The City's ***Stormwater Illicit Discharge and Connection Ordinance*** will be adopted in early 2009 which designates the Wastewater Plant and Collection Systems Director and all employees or designees of said Director, including, but not limited to, Building Inspector, City Engineer and Director of Public Works, as the authorized enforcement agency.

### Procedures for Responding to Known or Suspected Illicit Discharges:

If dry weather field screening efforts reveal discharges with color, odor, turbidity, oil sheen, or surface scum, a field analysis shall be conducted that includes testing of the discharge for detergents and ammonia. This testing shall be completed to determine whether the flow is contaminated with sanitary or wastewater, and whether the source is tap water or a natural source of water.

The City will notify the Wisconsin Department of Natural Resources (DNR), in accordance with NR 706 of the Wisconsin Administrative Code, immediately upon discovering a spill or hazardous substance which may result in discharge of pollutants to waters of the state. The DNR can be notified at **1-800-943-0003**. The City will cooperate with the DNR in efforts to investigate and prevent such discharges from polluting waters of the state.

**WPDES STORM WATER PERMIT  
ILLICIT DISCHARGE RESPONSE PROCEDURES**

1. Pollution Concern Hotline

A complaint hotline will be set up with a dedicated phone number directed to the Wastewater Department and an icon on the City's website where citizens can easily report illicit discharge and pollution concerns. The hotline will be checked on a daily basis by the Wastewater Department's Administrative Assistant and all concerns will be logged in an Illicit Discharge Concern Inventory.

The Wastewater Director will review the reported concerns within 48 hours of notification and direct the appropriate City staff to field investigate the concern. Initial field investigation will consist of visual inspection of the surface waters and storm sewer manholes for evidence of discharge in the highlighted area. Results of this field investigation will be reported to the Wastewater Director for further action.

2. Drainage Area Investigations

If the Wastewater Director determines that there is reasonable evidence of an illicit discharge, the next step will be a drainage area investigation. This process can be performed by a number of City staff, such as the Director of Public Works, the Building Inspector, or the City Engineer. This investigation consists of a parcel by parcel analysis of potential generating sites within the drainage area of a problem outfall. Techniques used to investigate the drainage area include:

- Land Use Investigations
- SIC code review
- Building Permit review
- As-built construction plan review
- Property ownership research through County Tax Inquiry

The results of the drainage area investigation will be reported to the Wastewater Director and he will be determined whether Storm Drain Network Investigations are necessary or if the City can proceed directly to On-Site Discharge Investigations.

3. Storm Drain Network Investigations

When a drainage area is identified, storm drain investigations can narrow the source of a discharge problem to a single segment of a storm sewer. The investigation should start at the outfall and work progressively up the trunk sewer. If necessary, the Wastewater Director will coordinate with the City Engineer and any outside contractors, to perform the following tasks:

- Smoke Testing
- Video Taping
- Dye Testing
- Water Sampling

The results of the Storm Drain Network Investigation will be reported to the Wastewater Director and it will be determined whether On-Site Discharge Investigations will be necessary.

4. On-Site Discharge Investigations

Once the illicit discharge has been isolated to a specific section of storm sewer, an on-site investigation can be performed. On-site investigations are typically performed by observation, water sampling and/or dye testing the plumbing systems of households and buildings. The Wastewater Director's employees shall perform the on-site investigations and report findings to him for enforcement action.

5. Correction and Enforcement

Whenever the City finds a person has violated a prohibition or failed to meet a requirement of the Illicit Discharge & Connection Ordinance as determined through the procedures above, the City may order compliance by written notice of violation to the responsible person. Such notice may require without limitation the actions listed in the Illicit Discharge & Connection Ordinance.

These procedures have been derived from the following reference manuals:

New England Interstate Water Pollution Control Commission, 2003. *Illicit Discharge Detection and Elimination Manual, A Handbook for Municipalities*.

Center for Watershed Protection and Robert Pitt, 2004. *Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments*.

**City of Hartford contact for Illicit Discharge issues:**

**Dave Piquett**, Wastewater Plant and Collection Systems Director

**Contact Information: (262) 673-2423 – Phone**

**(262) 673-8919 – Fax**

**reportpollution@ci.hartford.wi.us**