

University of Wisconsin – La Crosse
Storm Water Management Program
2020 Illicit Discharge Detection and Elimination Plan

I. Background:

This plan is developed to fulfill requirements of the WI Department of Natural Resources general permit to discharge under the Wisconsin Pollutant Discharge Elimination System (WPDES) Permit No. WI-S050075-3.

II. UWL Specific Permit Conditions – Illicit Discharge Detection and Elimination (IDDE):

2.3.2 IDDE field screening. On-going dry weather field screening shall be conducted at 100% of the total major outfalls at least once during the term of the permit. Additionally, the permittee shall select minor outfalls for annual on-going dry weather field screening during the term of the permit. The permittee shall develop a prioritization procedure to assist with selecting minor outfalls and consideration shall be given to hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types when selecting outfalls for annual field screening. At a minimum, field screening shall be documented and include:

- a. Visual Observation - A narrative description of visual observations including color, odor, turbidity, oil sheen or surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illicit dumping.
- b. Field Analysis - If flow is observed, a field analysis shall be conducted to determine the presence of illicit non-storm water discharges or illicit dumping. The field analysis shall include sampling for pH, total chlorine, total copper, total phenol and detergents, unless the permittee elects instead to use detergent, ammonia, potassium and fluoride as the indicator parameters. Other alternative indicator parameters may be authorized by the Department in writing.
 - (1) Field screening points shall, where possible, be located downstream of any source of suspected illicit activity.
 - (2) Field screening points shall be located where practicable at the farthest manhole or other accessible location downstream in the system. Safety of personnel and accessibility of the location shall be considered in making this determination.

2.3.3 IDDE source investigation and elimination. Written procedures for responding to known or suspected illicit discharges, including an assessment of risks and the establishment to response times. At a minimum, procedures shall be established for:

- a. Investigating portions of the MS4 that, based on the results of field screening or other information, indicate a reasonable potential for containing illicit discharges or other sources of non-storm water discharges.

- b. Responding to spills that discharge into and/or from the MS4 including tracking and locating the source of the spill if unknown.
- c. Preventing and containing spills that may discharge into or are already within the MS4.
- d. Promoting, publicizing, and facilitating public reporting of illicit discharges or water quality impacts associated with discharges into or from MS4s through a central contact point, including a form, website, email address, and/or telephone number for complaints and spill reporting, and publicize to both internal permittee staff and the public.
- e. Notifying the Department immediately in accordance with ch. NR 706, Wis. Adm. Code, in the event that the permittee identifies a spill or release of a hazardous substance, which has resulted or may result in the discharge of pollutants into waters of the state. The Department shall be notified via the 24-hour toll free spill hotline at 1-800-943-0003. The permittee shall cooperate with the Department in efforts to investigate and prevent such discharges from polluting waters of the state.
- f. Detecting and eliminating cross-connections and leakage from sanitary conveyance systems into the MS4.
- g. Providing the Department with advanced notice of the time and location of dye testing within an MS4. Department notification prior to dye testing is required due to the likelihood that dye observed in waterways will be reported to the Department as an illicit discharge or spill.
- h. Documentation of the following information:
 - (1) Dates and locations of IDDE screenings conducted in accordance with section 2.3.2.
 - (2) Reports of alleged illicit discharges received, including dates of the reports, and any follow-up actions taken by the permittee.
 - (3) Dates of discovery of all illicit discharges.
 - (4) Identification of outfalls, or other areas, where illicit discharge have been discovered.
 - (5) Sources (including a description and the responsible party) of illicit discharges (if known).
 - (6) Actions taken by the permittee, including dates, to address discovered illicit discharges.

2.3.4 The permittee shall take appropriate action to remove known illicit discharges from its MS4 system discovered under section 2.3 as soon as possible. If it will take more than 30 days to remove an illicit connection or if the potential illicit discharge is from a facility with WPDES permit coverage, the Department shall be contacted to discuss an appropriate action and/or timeframe for removal. Notwithstanding this 30-day timeframe and notification of the Department, the permittee shall be responsible for any known illicit connections to its MS4 system that are a significant risk to human health and the environment.

2.3.5 In the case of interconnected MS4s, the permittee shall notify the appropriate municipality within one working day of either of the following:

- a. An illicit discharge that originates from the permittee's permitted area that discharges directly to a municipal separate storm sewer or property under the jurisdiction of another municipality.
- b. An illicit discharge that has been tracked upstream to the interconnection point with or outfall from another municipality.

2.3.6 The name, title and phone number of the individuals responsible for responding to reports of illicit discharges and spills shall be included in the illicit discharge response procedure.

III. UWL Five-Year Illicit Discharge Detection and Elimination (IDDE) Plan:

Code Section and Title	Description of Requirement	Task
2.3.2 IDDE Field Screening	Dry weather field screening at 100% of the total major outfalls.	No major outfalls exist at the University of Wisconsin La Crosse (UWL). The UWL and City of La Crosse (City) have an interconnected storm sewer system. The City conducts field screening at its major outfalls per City IDDE Plans. UWL pays quarterly storm water utility fees.
2.3.2 IDDE Field Screening	Dry weather field screening at minor outfalls.	The UWL and City have an interconnected storm sewer system. The City conducts field screening at its minor outfalls per City IDDE Plans. UWL pays quarterly storm water utility fees. UWL will conduct annual screening at minor outfalls. UWL will field screen at two locations. The locations are nearest the point of interconnection and as close as practical to the last UWL downstream connection to the City owned storm sewer system. See Figure 1. UWL IDDE Field Screening Location Map for more detail. Record data on Appendix A, IDDE Field Screening form.
2.3.3, 2.3.4, 2.3.5, and 2.3.6	Implement written procedures for responding to known or suspected illicit discharges.	Continue to manage and implement illicit discharges as included in Appendix B and Appendix C. Appendix B is posted on the UWL Storm Water Management Program website in the section titled: Illicit Discharge and Spill Reporting.

Figure 1. UWL IDDE Field Screening Location Map

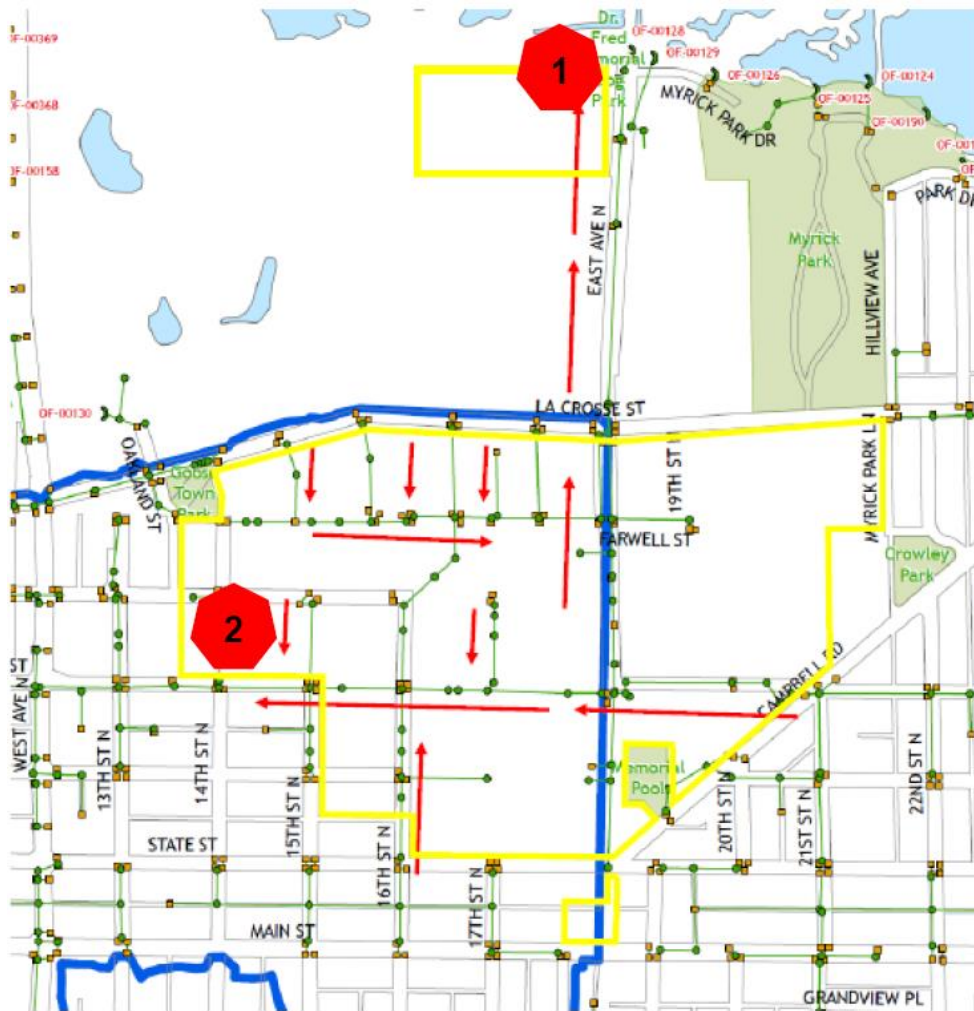


Figure 1 Notes and Key

1. Map shows portion of interconnected storm sewer system within campus boundaries of University of Wisconsin La Crosse. Storm sewer map was sourced from City of La Crosse's 2019 MS4 Annual Report. The report is available on the WI DNR website.
2. Yellow borders are approximate UWL boundaries.
3. Red arrows are primary flow pattern of storm water.
4. Green dots are storm manholes
5. Orange dots are storm catch basins.
6. Blue line represents drainage basin as included in City of La Crosse 2019 MS4 Report.
7. Red heptagon identifies minor outfall locations for field screening by University of Wisconsin La Crosse. Location 1 is City outfall OF-00128. This outfall drains directly into the La Crosse Marsh and is visible from an adjacent pedestrian trail. The outfall is located northeast of the intersection of East Ave. N. and Myrick Park Drive. Location 2 is a City of La Crosse storm manhole near the corner of 14th Street N and Pine Street. This location is a main storm sewer drain leading to City of La Crosse outfall OF-00191.

**University of Wisconsin La Crosse
Minor Outfall Dry Weather Screening Form**

Site Description: _____

Site Location: _____

Date/Time: _____

Site Inspector(s): _____

Visual Observation (circle response)

Is flow present from outfall? Yes No Note: If flow is observed, a field analysis shall be conducted to include sampling for pH, total chlorine, total copper, total phenol, and detergents/surfactants.

Flow description: High flow Medium Flow Low Flow Trickle Not-Applicable

Odor: Sewage Rancid Sour Sulfur/Rotten Egg Petroleum Other: _____

Color of flow: _____ Not-Applicable

Turbidity: Turbid Clear Opaque Not-Applicable

Presence of oil sheen: Yes No

Presence of surface scum: Yes No

Other relevant observations regarding the potential presence of non-storm water discharges or illicit dumping: _____

Appendix B: Illicit Discharge and Spill Reporting

UW-L enforces storm water protection code at Wisconsin Administrative Code UWS 18.06(1) which prohibits dumping and other prohibited discharges to storm water. In addition, UWL's storm water discharge permit prohibits illicit discharges to the storm sewer system.

If you see an illicit discharge or spill on UWL property that could result in an immediate threat to human health or the environment please call University Police at (608) 789-9999. If you observe a situation on campus that could likely cause a spill or discharge in the future, please contact [Environmental Health and Safety](#) or call (608) 785-6800 during regular business hours. We appreciate your assistance with UWL's continued actions to enhance environmental quality through eliminating release of pollutants that can impact the environment through storm water. All notifications can be made anonymously.

Illicit discharge is defined as any discharge to a storm sewer system that is not composed entirely of storm water. Illicit discharges allow contaminated wastewater to drain untreated to the La Crosse Marsh, La Crosse River, or Mississippi River. Illicit discharges include illegal dumping and illegal connections to the storm sewer system by commercial, industrial, or residential properties. Prohibited discharges include, but are not limited to: oil, anti-freeze, grease, chemicals, paint, animal waste, garbage, litter, and landscaping debris.

It is important to note that there are many non-storm water discharges that are not considered illicit discharges. These include, but are not limited to: water-line flushing, landscape irrigation, lawn watering, and water used for firefighting.

UWL will take immediate action to assess and address any active illicit discharge release that could result in an immediate threat to human health or the environment. Reports of a situation on campus that could cause an illicit discharge will be assessed in a timely manner, usually within two business days of a notification.

In the event a flow is observed, or evidence suggests that illicit discharges may exist, further investigation shall be administered by any of the following methods.

1. Tracing discharge up the storm sewer system.
2. Sampling of a discharge for analysis in order to determine if a pollutant is present and to identify the pollutant.
3. Implement Best Management Practices to eliminate illicit discharges.
4. Scheduling of follow up observations.
5. Any other appropriate measures deemed necessary.

The results of inspections and analytical testing data shall be maintained in a format to allow tracking of outfall locations, inspection dates, chemical tests conducted, and follow-up procedures implemented to correct any detected illicit discharge. The physical condition of the outfall shall also be noted during the inspection.

Flows suspected of containing illicit discharges due to the presence of odors, colors or sheens shall be tested. Test parameters may include but are not limited to pH, total chlorine, total copper, total phenol, and detergents.

Field surveys and instances of illicit discharges or spills shall be tracked on the Illicit Discharge Report Form included in Appendix C.

Illicit discharge data will be used in the preparation of the annual report to the Wisconsin Department of Natural Resources.

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Appendix C: Illicit Discharge Report Form

**University of Wisconsin La Crosse
Community Member Notification
Illicit Discharge Reporting Form**

Name: _____ Contact Phone Number: _____

Date: _____ Time Discharge Discovered: _____

Date of Last Rain Event: _____ Estimated Quantity of Rain: _____ in.

Physical Location of Discharge (indicate nearby street intersections, building or other landmarks):

Where was discharge found? Storm Sewer Grassy Area Pavement/Parking Street

Other: _____

Was Water Flow Observed? No Yes .

Was Flow Continuous? No Yes

Was a Photo Taken? No Yes (Please attach a copy to form)

Describe Odor: None Musty Sewage Rotten Eggs Bitter (Irritating)

Other: _____

Color: Clear Red Yellow Brown Green Grey Other: _____

Clarity: Clear Cloudy Opaque

Was There An: Oily Sheen Yes No

Garbage Yes No

Leaves, Grass, Other Decaying Vegetation Yes No

Other: _____

Additional Information to Assist in the Investigation: _____

Follow up Investigation (This section to be completed by UWL Environmental Health and Safety or UWL Facilities Management.)

Inspector Name: _____ **Phone:** _____

Inspector Signature: _____ **Date:** _____

Field Analysis:

Water Temperature: _____ °F / °C Chlorine (Total): _____ mg/l

pH: _____ Copper: (Total) _____ mg/l

Phenol (Total): _____ mg/l Detergents/Surfactants (Total) _____ mg/l

Was a Laboratory Sample Collected? No Yes (If yes, attach copy of chain-of-custody)

Comments/Notes: _____

Provide Date of Follow-up with Person Making Notification (Attach all written communication):

