

City of Appleton

Illicit Discharge Detection and Elimination (IDDE) Program

Section 2.3 WPDES Permit No. WI-S050075-3

Permit Start Date May 1, 2019

January 2021

This document describes the City of Appleton Illicit Discharge Detection and Elimination (IDDE) Program as required in the Phase II Stormwater Permit from the Wisconsin Department of Natural Resources (WDNR). This document is an update to the original program document dated October 2008 and the 2017 revision.

Most costs associated with this program are funded through the City of Appleton Stormwater Utility. Any spill response handled by the Appleton Fire Department will continue to be funded through that budget.

This document will be kept in the Engineering Division of the Department of Public Works located on the fifth floor of City Center, 100 N. Appleton Street, Appleton, Wisconsin.

Bold text below is from the permit.

2.3 Illicit Discharge Detection and Elimination (IDDE) – The permittee shall continue to implement and enforce its program to detect and remove illicit connections and discharges to the MS4. The permittee shall implement the following measurable goals:

2.3.1 IDDE ordinance. An ordinance or other regulatory mechanism to prevent and eliminate illicit discharges and connections to the MS4. At a minimum, the ordinance or other regulatory mechanism shall:

- a. Prohibit illicit discharges and the discharge, spilling or dumping of non-stormwater substances or materials into waters of the state or MS4.**
- b. Identify non-stormwater discharges or flows that are not considered illicit discharges.**
- c. Establish inspection and enforcement authority.**

The City of Appleton “Illicit Discharges and Connections” ordinance first became effective in March 2008 and was updated in 2015. It was updated again in April 2020 for this permit. It is available as Article VII of Chapter 20 of the Municipal Code titled “Illicit Discharges and Connections” and is located on the City’s website.

The City of Appleton also has a “Fire Prevention and Protection” Ordinance. Section 6-61 of the Municipal Code specifically addresses the discharge of hazardous materials and can also be found on the City’s website. This ordinance was last updated in January 2018.

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 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-stormwater discharges or illicit dumping.

b. Field Analysis – If flow is observed, a field analysis shall be conducted to determine the presence of illicit non-stormwater 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 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.

The City has contracted with a consultant to perform on-going field screening and associated reporting since this requirement began. The City will continue to contract with a qualified consulting firm to perform on-going field screening and reporting. Requests for proposals will be issued approximately every five (5) years.

In 2012, the City contracted with OMNNI Associates to prepare the On-going Field Screening Program, which evaluated outfalls in terms of risk per the WDNR guidance document, and established priorities and rotation of the field screening at each minor, major and supplemental outfall. Supplemental outfalls include those that will likely

provide better information than major or minor outfalls, such as stormwater pond inlet pipes. The program was revised in 2014 and again in 2020 by OMNNI Associates for compliance with this permit.

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-stormwater discharges.

This requirement is addressed through the annual Field Screening contract.

b. Responding to spills that discharge into and/or from the MS4 including tracking and locating the source of the spill if unknown.

The City of Appleton Spill and Illicit Discharge Response Procedure Manual was developed using the template manual created by NEWSC. It was reviewed and updated in 2020 as part of this program update and is included as Attachment A.

c. Preventing and containing spills that may discharge into or are already within the MS4.

Spill kits are available at City facilities per the individual Pollution Prevention Plans for each site. DPW Operations and Fire Department staff have spill containment supplies and equipment available for response to spills and illicit discharges.

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.

Beginning in January 2021, the City will post the Inspections Division phone number monthly on Facebook for reporting of potential illicit discharges by the public. The City's stormwater page on the website was updated to include information for the public on how to report potential illicit discharges to the Inspections Division.

Public reporting of a potential illicit discharge is entered into a Customer Service log and assigned to a Plumbing Inspector in the Inspections Division of the

Department of Public Works. City staff is reminded annually to report any potential illicit discharge to the Inspections Division.

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 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.

The response to any spills or release of hazardous substance is by the Appleton Fire Department. A flow chart of their procedure is included in the Spill and Illicit Discharge Response Procedure Manual.

f. Detecting and eliminating cross-connections and leakage from sanitary conveyance systems into the MS4.

Cross-connections and leaking sanitary sewers are addressed through the sanitary sewer program. This program includes the following elements:

- Televising all sanitary sewers on approximately an 8-10 year cycle
- Making televising reports available to various City staff through Pipe Tech software and GIS applications
- Reconstructing sanitary main in poor condition prior to street reconstruction
- Reconstructing sanitary laterals within the right of way prior to street reconstruction
- A successful pilot project to reconstruct sanitary laterals from the main to the house in a cost-effective manner was completed and, beginning in 2021, the Sanitary Lateral Program will replace approximately 40 laterals from the main to the house annually.
- Monthly workgroup meetings of DPW Engineering, Inspections and Operations staff and Utilities Department staff involved in maintaining the sanitary sewer system

g. Providing the Department with advance 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.

The City of Appleton will notify the WDNR in advance of any dye testing in the storm sewer system performed by the City or a company contracted with the City.

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.**

These items are documented in the On-Going Field Screening Report by the City's consultant and the Inspections Division Illicit Discharge log, which are both submitted to WDNR each year with the annual report.

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.

The City of Appleton will take appropriate action to remove illicit discharges from its MS4 system as soon as possible. If it will take more than 30 days to remove an illicit connection, the City of Appleton will contact the WDNR to discuss appropriate action and/or timeframe for removal.

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.**

Under either of these conditions, the City of Appleton will notify the affected municipality within one working day. A contact list for the adjacent municipalities is included in the Response Procedures Manual.

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.

This information is included in the City of Appleton Spill and Illicit Discharge Response Procedure Manual. As of this program update, the designated individual is the Inspections Supervisor, Kurt Craanen, 920-832-6411 (920-832-6413 direct).

ATTACHMENT A
SPILL AND ILLICIT DISCHARGE RESPONSE
PROCEDURE MANUAL

CITY OF APPLETON

Spill and Illicit Discharge Response Procedures Manual

November 2020



Department of Public Works-Inspections and Operations Divisions

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The purpose of this Spill and Illicit Discharge Response Procedure Manual is to provide a framework for spill and illicit discharge response procedures in the City of Appleton and to comply with the Wisconsin Department of Natural Resources (WDNR) WPDES Permit No. WI-S050075-3 requirements. All employees are expected to work cooperatively with state and local agencies to define, contain, and clean up spills and illicit discharges.

Any and all spills or illicit discharges that may cause a fire, explosion, immediate safety hazard to life, health or the environment, or need to evacuate, will be responded to by the Appleton Fire Department, following their standard operating procedures. This manual does not apply to any situations under the jurisdiction of the Appleton Fire Department. In general, spills that are reportable to WDNR will be under the jurisdiction of the Fire Department.

This manual is designed to provide general response procedures to be followed by City of Appleton employees that are not members of the Fire Department. However, each situation is unique and field conditions may determine different procedures.

For the City of Appleton, Kurt Craanen, Inspections Supervisor in the Department of Public Works, 920-832-6411, is the designated Illicit Discharge Coordinator. In his absence, the following people can be contacted:

Jim Becker, Plumbing Inspector	920-832-6411
Dale VandeWalle, Plumbing Inspector	920-832-6411
Sue Olson, Staff Engineer	920-832-6474
Ross Buetow, City Engineer	920-832-6474

The numbers listed above are office numbers and are to be used during normal business hours (8:00 am to 4:30 pm). Home and mobile telephone numbers are not to be released to the public.

After hours reports can be called in to the Public Works Department and standard call-in procedures for the Operations Division will be followed.

I - DISCOVERY AND NOTIFICATION

- a) Reports of spills and illicit discharges may be made to the Operations Division located at the Municipal Services Building (MSB), Engineering, Inspections, the Mayor's office, or any other city department. Spills and illicit discharges may also be found by the City's consultant during the On-going Field Screening Program, or by city staff performing daily activities. Flow charts depicting various paths are provided in Appendix A.
- b) Front desk personnel in Engineering, Inspections or at MSB receiving calls regarding a spill or illicit discharge will accept information using the City of Appleton Customer Service module. A sample screen is shown in Appendix B.
- c) If it is obvious that there is a fire, explosion or safety hazard to life, health, or the environment, or need to evacuate, **9-1-1** will be contacted immediately. This includes any incident involving petroleum sheen, sheen from any unknown source, a highly suspicious material or a large volume of material.
- d) If the need to contact **9-1-1** is not clearly obvious to personnel taking the report, they shall notify the Illicit Discharge Coordinator or MSB Foreman, who will evaluate the situation and make that determination.
- e) If the situation clearly does not require contacting **9-1-1**, front desk personnel shall notify the Illicit Discharge Coordinator or MSB Foreman of the report.
- f) If a non-emergency spill or illicit discharge is reported to **9-1-1** during non-business hours, dispatch will contact the Department of Public Works answering service, Mactel, who will follow the call in list and procedures. A Foreman will respond to evaluate the situation and call in additional personnel, if appropriate.

II – LOCATING THE SOURCE

- a) The source of the spill or illicit discharge may be easily identified or may need to be tracked down. The City of Appleton may use any or any combination of the following strategies to locate the source:

- Visual and smell indicators
 - Uncover manholes upstream to identify where flow may be coming from
 - Use additional samples and tests as needed to isolate potential source areas
 - Review available MS4 mapping to assist in tracking upstream of the incident
 - Dye-test sewers
 - Smoke test sewers
 - Televise sewers, depending on availability of a camera
- b) Tracking a substance may require the assistance of other persons or agencies, such as:
- Appleton Fire Department (emergency dial **9-1-1**, non-emergency 920-832-5810)
 - Appleton Department of Public Works Sewer Crew (daytime 920-832-5580)
 - Appleton Department of Public Works Water Division (daytime 920-832-5580)
 - Appleton Police Department (emergency dial **9-1-1**, non-emergency 920-832-5500)
 - Consultant contracted to perform on-going dry weather field screening
- c) If the source of the substance is found, it will be contained safely and legally through necessary means to the maximum extent practical.
- d) If the substance may be coming from or going to another municipality, the Coordinator or Foreman will contact that municipality as soon as possible or at least within one working day. Contact names and phone numbers for adjacent municipalities are listed in Appendix C.
- e) If the source of the spill or illicit discharge is not found the available information will be documented in the tracking spreadsheet.

III – Cleanup and Enforcement

- a) The Inspections Division will write any necessary orders for the responsible party to continue containment and begin clean up and repairs found to be causing a spill or illicit discharge. Stepped enforcement procedures, as listed below, may be used:
- Written orders from the Inspections Division
 - A second notice of the written orders

- Letter from the City Attorney's office
- Citation
- Follow up will continue until the source is eliminated

However, depending on the severity of the situation, the Inspections Division has the discretion to skip any step and require any time frame that they believe is appropriate.

- b) If the source of the spill or illicit discharge is not eliminated in 30 days, the WDNR will be notified.

IV – Documentation

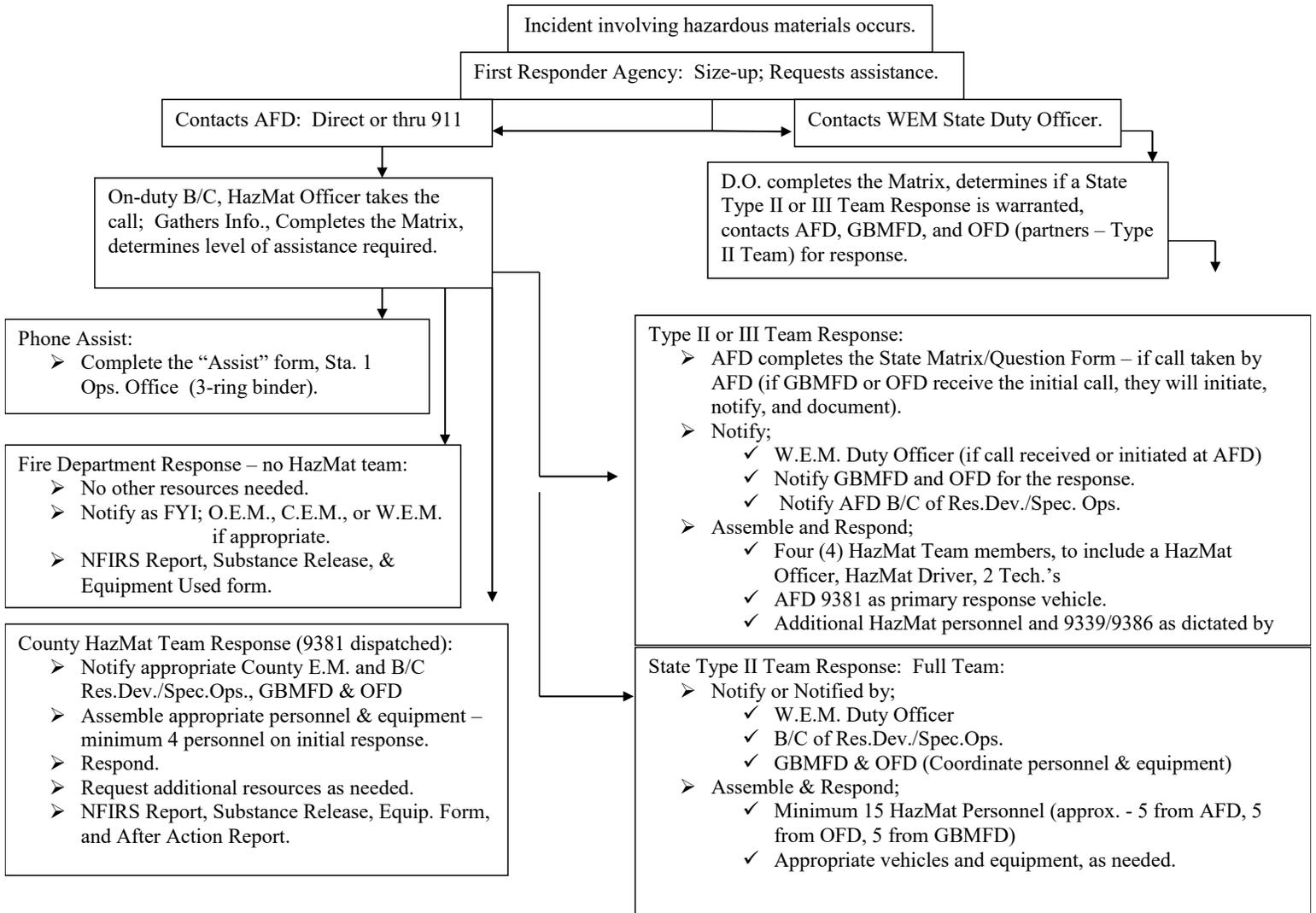
- a) Any City of Appleton staff involved in a spill or illicit discharge response may be asked by the Coordinator or Foreman to assist in documenting the incident.

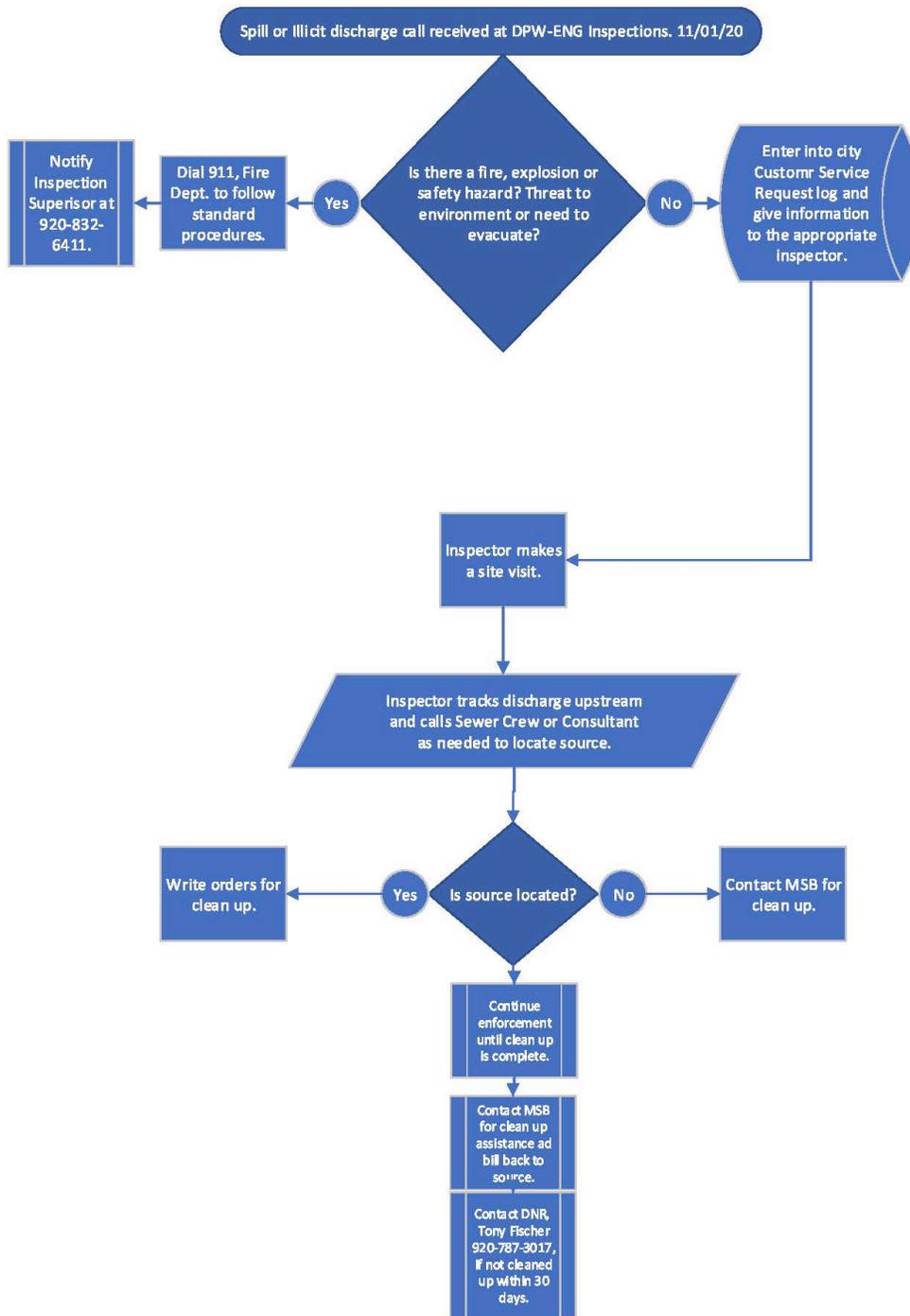
- b) A log will be kept for reports of illicit discharges. The following types of documentation, as appropriate for the situation, may also be kept during a spill or illicit discharge event:

- A written log that includes:
 - Dates of reports of alleged illicit discharges
 - Follow up actions taken for each report and discovered illicit discharges
 - Source of confirmed illicit discharge with description and responsible party
- Photographs
- Sketches or Maps
- A list of the names of those who have been involved, their agency and contact information.
- Other data as may be deemed appropriate by those involved in managing the incident

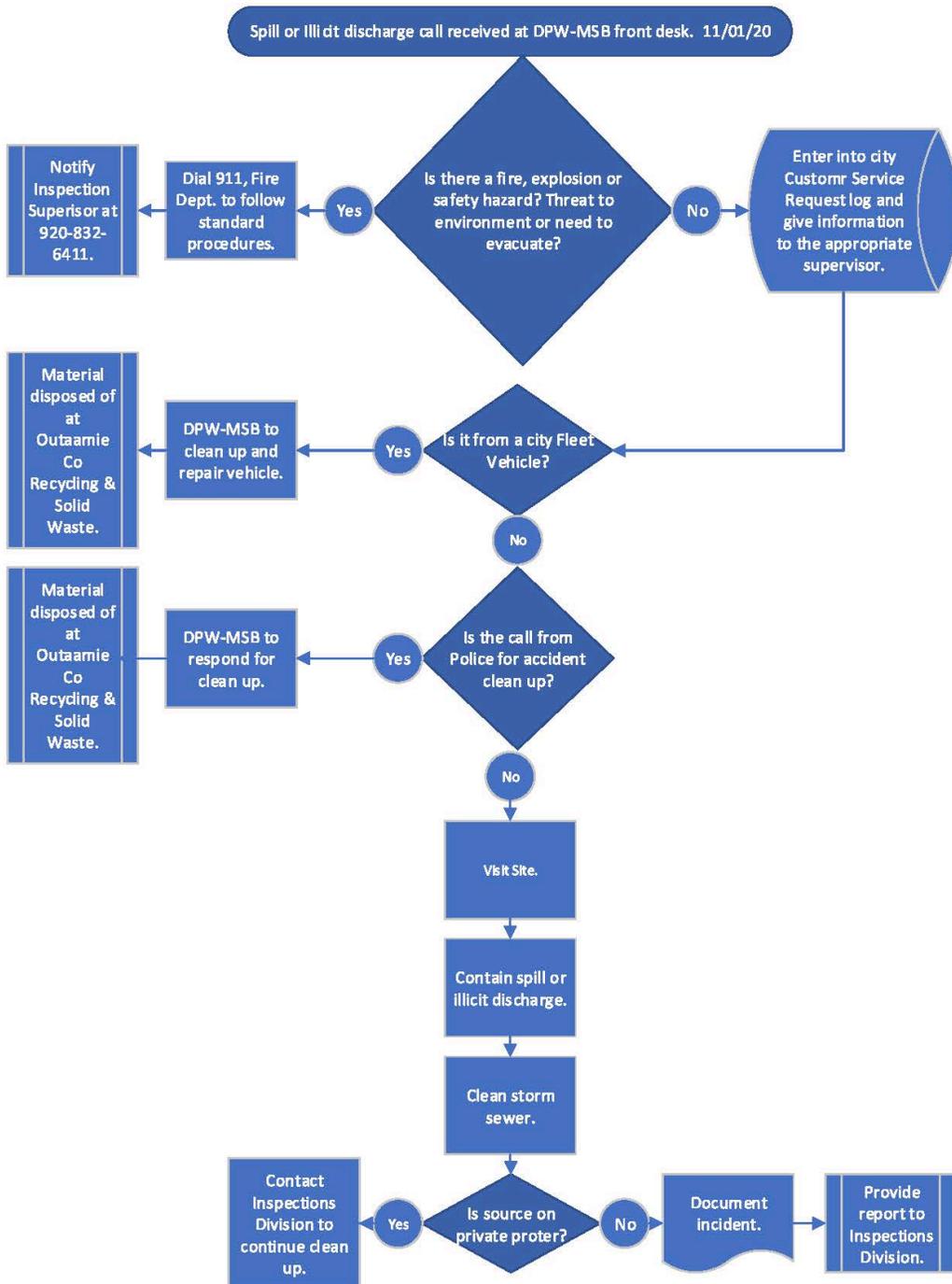
- c) Documentation will be kept in the City of Appleton Customer Service module as much as possible. Additional file information may be kept in the Inspections Division, at MSB, or at the Fire Department, depending on the primary response personnel.

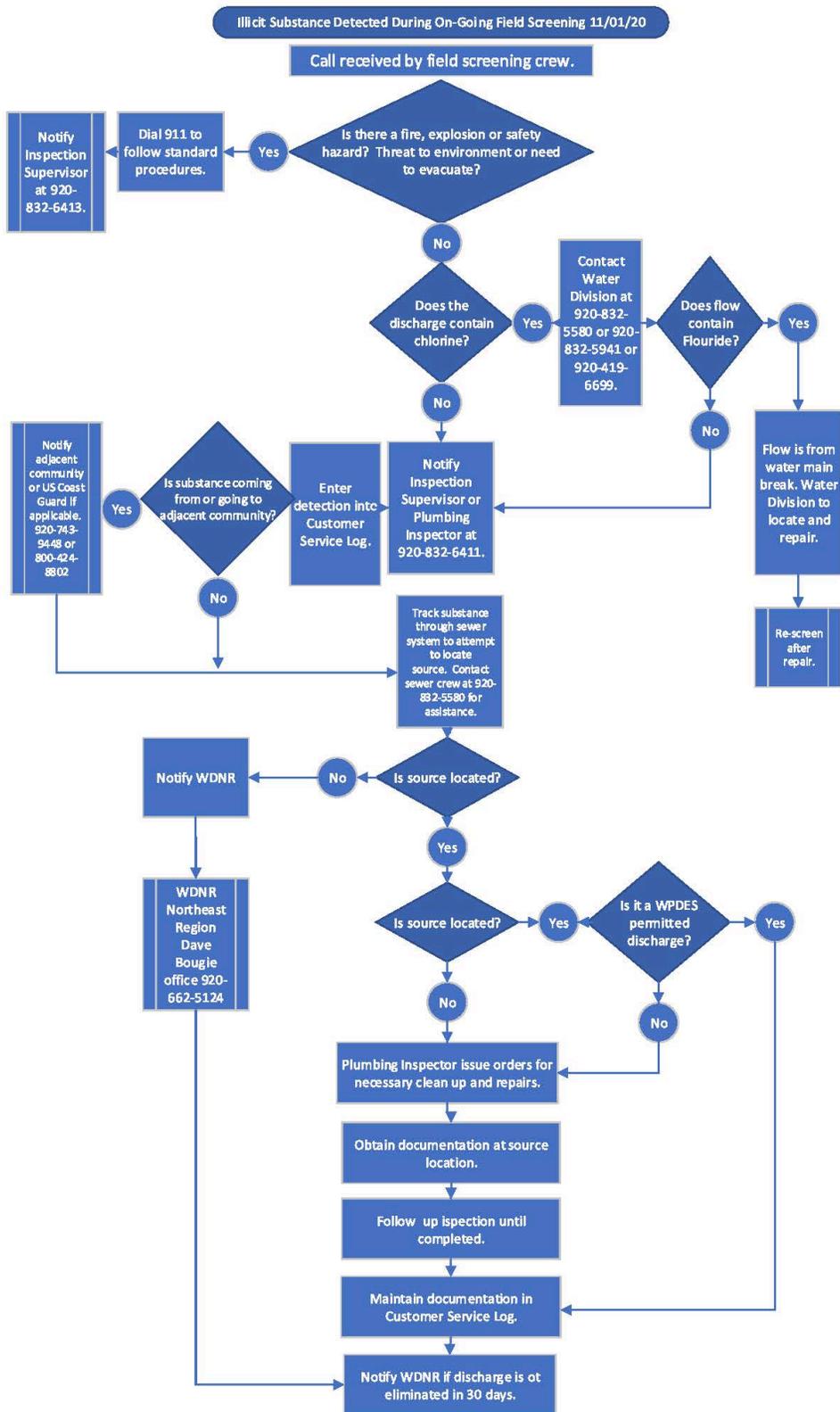
HazMat Response Flow Chart





Appendix A





Appendix B

Pgm -AMS1145 Customer Request Sheet
 User-KURTC
 Wsid-QPADEV0018

Page- 1
 Date- 10/28/20
 Time- 11:09:02

Request - 189105 ILLICIT DISCHARGE
 Dept/Div- DPW ISP
 Type- 9 ILLICIT DISCHARGE
 Sub type- 2 DID NOT ENTER STORM SEWER
 Location- FRONT DRIVEWAY
 Str addr- 1208 S THEODORE ST
 Parcel- 31-4-5247-00 HERMANS III JOHN J
 1208 S THEODORE ST APPLETON WI 54915
 Rental- N
 Requestor- STEVE KIHL

Phone #1 -
 Phone #2 -
 cell phon-
 Tax phon-

needs wo -
 called back- 00/00/00

Assigned to- 6558 JAMES ROBERT BECKER

 Request notes-

02-10-20 - RECEIVED THIS REQUEST FROM STEVE KIHL-
 HEALTH INSPECTOR WHO RECEIVED IT FROM THE NEIGHBOR
 OF 1208 S. THEODORE. APPARENTLY 1208 HAS A LARGE
 OIL LEAK ON ONE OF THE AUTOMOBILES THAT PUDDLES IN
 DRIVEWAY AND IN STREET WHEN SITTING. NEIGHBOR IS
 CONCERNED IT COULD RUN INTO STORM SEWERS. THERE
 HAS BEEN A LARGE SNOW EVENT THE PAST SUNDAY, SO IN
 SPECTION IS DIFFICULT. WILL HAVE TO WAIT UNTIL SNO
 SNOW HAS MELTED TO INSPECT.
 02-24-20 SITE VISIT. TOOK PICTURES OF OIL STAINS
 ON DRIVEWAY. PRETTY LARGE SPOT OF OIL THAT WILL
 NEED TO BE DRIED UP. CLEANED UP. NO ONE APPEARS TO
 BE HOME, I LEFT A HANG TAG ON DOOR- TOOK PIC.
 03-13-20 SITE VISIT, NO CHANGE. OIL SPOT REMAINS
 06-02-20 OIL SPOT GREATLY DRIED. THERE STILL IS
 BLACK COLOR ON CEMENT, BUT NOTHING RUN INTO SIDE
 WALK OR STREET. OK TO CLOSE.

----- Other calls at location -----
 Date Desc Dept/Div Requestor Status Request

ADJACENT COMMUNITIES CONTACT LIST

Town of Grand Chute

Robert Buckingham – Community Development Director – 920-832-1599 (Planning & Zoning)

Katie Schwarz – Director of Public Works – 920-832-1581

Village of Fox Crossing (formerly Town of Menasha)

George L. Dearborn, Jr. – Director of Community Development – 920-720-7105 (Planning)

City of Menasha

Corey Gordon – Deputy Director of Engineering – 920-967-3610

Adam Alix – Director of Public Works – 920-967-3610

Village of Little Chute

Kent Taylor – Director of Public Works – 920-423-3865

Chris Murawski – Village Engineer – 920-423-3861

Village/Town of Harrison

Town Administrator/Village Manager – 920-989-1062

Jeff Funk – Operations Manager – 920-989-1139

Town of Buchanan

Adam Gitter –Town Administrator/Stormwater Manager – 920-257-5845

Village of Kimberly

Allyn Dannhoff – Director of Operations – 920-788-7500

Greg Ulman – Street Foreman – 920-788-7507