

**AUDIT FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION
327 IAC 15-13-14**

Date: July 19, 2012

Permit Number: INR040103

MS4 Name: Valparaiso Lakes Area Conservancy District

County: Porter

MS4 Operator or Coordinator: Robert Minarich

Present at Audit: Robert Minarich, David Hollenbeck, VLACD Attorney

This evaluation is intended to assess the level of compliance with 327 IAC 15-13-14 (Rule 13) and to identify areas where additional measures may be required to detect and eliminate illicit discharges to the MS4 conveyance.

The Following Items Were Evaluated and Assigned a Designation:

S = Satisfactory M = Marginal

U = Unsatisfactory

NA = Not Applicable

Definitions

Satisfactory: The item is currently in compliance with the Rule

Marginal: A concern was identified; corrective action is strongly recommended to remain in compliance

Unsatisfactory: A violation was identified and the IDDE Minimum Control Measure is not in compliance; corrective action is required

Not Applicable: Does not apply at this time

**Storm Water Quality Management Plan (SWQMP) Illicit Discharge Detection and Elimination (IDDE)
Minimum Control Measure (MCM)**

S M U NA

- | | | | | |
|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (1) The SWQMP includes a strategy or plan to detect and eliminate illicit discharges to the MS4 conveyances. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (2) A storm sewer map showing the location of all outfalls and MS4 conveyances in the MS4 area is complete and a copy provided for review. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (3) All known outfall conveyance systems with a pipe diameter of 12 inches or larger and open ditches with 24 inch bottom widths or larger are included on the map. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (4) All known outfall conveyance systems with a pipe diameter of less than 12 inches and open ditch with less than 24-inch bottom widths are included on the map. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (5) If mapping of all MS4 outfalls and conveyance systems is not complete, is a plan and timetable in place to complete the mapping? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | (6) Has the MS4 developed and implemented an ordinance or other regulatory mechanism prohibiting illicit discharges including illegal dumping into conveyances and a copy was available for review. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (7) Does the existing IDDE ordinance or regulatory mechanism contain appropriate enforcement procedures and actions? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (8) Was documentation provided for tracking illicit discharge activities provided for review? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (7) Did the MS4 provide a plan to locate problem areas via dry weather screening, determine the source, remove or otherwise correct illicit connections and document the actions taken? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (10) The MS4 provided a field-screening plan and timetable for dry weather screening and testing of all outfalls. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (11) The MS4 identified the level of screening used and the documentation of the outfall screening. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | (12) The MS4 provided a record of all active industrial facilities within the MS4 area that discharge into the MS4 conveyance. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (13) The MS4 provided documentation that they reviewed the IDDE plan for adequacy and accuracy and updated it if necessary. |

S M U NA

- (14)** The MS4 provided documentation that IDDE education was provided to public employees, businesses, and the public about the hazards associated with illicit discharges and the improper disposal of waste?
- (15)** Did the MS4 develop a process for the facilitating and reporting of illicit discharges by the public?
- (16)** Is there a recycling program in place in the MS4 area for commonly dumped wastes, such as motor oil, antifreeze, and pesticides?

Comments:

- The only issue at the time of the audit was that the ordinance was not approved by signature of the board. The MS4 attorney stated that the ordinance was complete and would be presented to the VLACD Board on July 18, 2012 for signature.
- The MS4 demonstrated an aggressive outfall-screening program that includes ongoing monitoring and testing.

Mapping: Good **Better** Best Program is in violation and/or requires changes to maintain compliance

Good - (Minimum requirement) - Longitude and latitude in decimal degrees on non-GIS platform and completion of the mapping of all outfalls and MS4 conveyances for the 12-inch pipes and 24-inch ditches

Better - GIS based map with mapping-grade accuracy data and where accuracy discrepancy is less than five meters, mapping of all outfalls and MS4 conveyances for the 12-inch pipes and 24-inch ditches is completed and a timetable is in place for the completion of the mapping of the remaining outfalls smaller than 12/24

Best - GIS based map that includes mapping of all outfalls, MS4 conveyances, and applicable land use data; maps may also include private and mutual drains, impervious surfaces and industrial and commercial facilities with SIC codes

Field Screening: Good Better **Best** Program is in violation and/or requires changes to maintain compliance.

Good - (Minimum requirement) - Problem areas have been located via dry weather screening through visual/physical inspections; a process for analyzing for pollutants of concern is used; a process for documentation of screening is in place; and all 12-inch pipes and 24-inches have been screened, a timetable is in place for the gradual approach to completing the screening of smaller pipes and ditches.

Better - All outfalls and MS4 conveyances have been screened via dry weather screening, documentation is in place, the IDDE plan includes a timetable for ongoing screening of outfalls and conveyances that have the highest level of concern based on screening, land use, and/or complaints

Best - All outfalls and MS4 conveyances have been screened via dry weather screening, documentation is in place, the MS4 IDDE plan includes a strategy to remove water bodies from the IDEM 303(d) list, the screening process is ongoing and includes detailed water quality analysis

Program Deficiencies/Violations:

The items listed below must be corrected and/or documentation provided to IDEM prior to **September 1, 2012**, unless otherwise noted.

1. The Valparaiso Lakes Area Conservancy District will provide to IDEM a copy of the signed IDDE ordinance

Questions or comments concerning this report should be directed to:

Ms. Reggie Korthals, MPA, MS4 Program Coordinator

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Wetlands and Storm Water Section, Surface Water, Operations & Enforcement Branch

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