

Illicit Discharge Detection Response Plan

City of Eden Prairie

Prepared by:



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1.0 Introduction

The City of Eden Prairie (City) has demonstrated a strong commitment to protecting its water resources and continues to strive to preserve its valuable parks, wetlands, streams, and lakes.

Stormwater discharges in Eden Prairie are regulated under the National Pollutant Discharge Elimination System (NPDES) by the MS4 General Permit, administered by the Minnesota Pollution Control Agency (MPCA). This Illicit Discharge Detection Response (IDDR) Plan serves as a guide for city staff to manage illicit discharges and illicit connections to the City's Municipal Separate Storm Sewer System (MS4).

This plan provides procedures and documents required to comply with the illicit discharge portions of the MS4 Permit, as described in Minimum Control Measure 3. Permit requirements were revised in 2013 by the MPCA for small MS4 cities in Minnesota. This plan addresses the revised requirements for Minimum Control Measure 3.

The specific goals of this IDDR Plan are to:

- Develop procedures to identify, investigate, enforce, and eliminate illicit discharges.
- Prioritize areas of the City that are more vulnerable or likely to have illicit discharges.
- Develop an inspection plan and schedule to identify potential illicit discharges.
- Meet staff and public education objectives of the City's NPDES MS4 Permit.
- Provide effective tools for City staff to identify and respond to illicit discharges.

1.1 Definitions

Best Management Practices (BMPs) – Practices to prevent or reduce the pollution of the waters of the state (Minn. R. 7090.0080).

Dispatch – The City of Eden Prairie's Police, Fire, and Emergency Medical Services (EMS) emergency dispatch call center, available by dialing 911 within city limits.

Drinking Water Supply Management Area (DWSMA) – Area surrounding a public water supply well, including the well head protection area, that must be managed by the entity identified in a Wellhead Protection Plan (WHPP).

Enforcement Response Procedures (ERPs) – A written requirement in the Municipal Separate Storm Sewer System (MS4) Stormwater Pollution Prevention Program (SWPPP) Permit (Part III) for Minimum Control Measures (MCM) 3, 4, and 5 for illicit discharge, construction site stormwater control, and post-construction stormwater management, respectively.

Environmental Coordinator – City Staff member in the Engineering Division within the Public Works Department who is responsible for the City’s Stormwater Pollution Prevention Program (SWPPP) Permit, including documentation of the City’s illicit discharge program.

Illicit Connection – Any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the storm drain system including, but not limited to, any non-stormwater discharge such as sewage, unpermitted wastewater, and process/wash water. Illicit connections would include any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by an authorized enforcement agency (City Code Sect. 5.75 Subd. 2).

Illicit Discharge – Any direct or indirect non-stormwater discharge to the storm sewer system except as exempted by Eden Prairie City Code Section 5.75 Subd. 4 (City Code Sect. 5.75 Subd. 2).

Municipal Separate Storm Sewer System (MS4) – A stormwater conveyance system or unified stormwater conveyance system including without limitation roads with drainage systems, municipal streets, catch basins, stormwater detention facilities, curbs, gutters, ditches, natural or man-made channels, or storm drains that are located within the corporate limits of Eden Prairie, Minnesota and are owned or operated by the City, State, County or other public body (City Code Sect. 5.75 Subd. 2).

Minimum Control Measure (MCM) – Goals within the Municipal Separate Storm Sewer System (MS4) General Permit that must be incorporated into stormwater management programs. There are a total of six MCMs and when implemented together are expected to result in reductions of pollutants discharged through the MS4.

Minnesota Pollution Control Agency (MPCA) – Regulatory agency in Minnesota and administrator of the State’s NDPES permits including the MS4 General Permit.

The National Pollutant Discharge Elimination System (NPDES) – Permit program which controls water pollution by regulating sources that discharge pollutants into waters of the United States (City Code Sect. 5.75 Subd. 2).

Navigable Waters – Waters that are presently used, or have been used in the past or may be susceptible for use, to transport interstate or foreign commerce. The Clean Water Act expands this definition to include tributaries and nearby wetlands when referring to the discharge of pollutants.

Pollutant – Any man-made or man-induced alteration of the chemical, physical, biological, thermal and/or radiological integrity of the water which has the potential to harm human life, aquatic life, terrestrial plant life, and/or wildlife (City Code Sect. 5.75 Subd. 2).

Receiving Water – Creeks, streams, rivers, lakes, estuaries, groundwater formations, or other bodies of water into which surface water, treated waste, or untreated waste are discharged.

SeeClickFix – A proprietary mobile and web application that can be used to report a maintenance issue to city staff while relaying additional information such as a photo and GPS location.

Stormwater – Any surface water flow, runoff, and/or drainage consisting entirely of water from natural precipitation and resulting from such precipitation (City Code Sect. 5.75 Subd. 2).

Stormwater Pollution Prevention Program/Plan (SWPPP) – Program or Plan developed by qualifying cities to prevent nonpoint source pollution as part of the MS4 General Permit.

Stormwater System – A Stormwater System includes any stormwater facility, drainage work or improvement that is designed to transport, convey or control the flow of stormwater or that improves or controls the water quality of stormwater. This shall include but is not limited to, outfalls, inlets, outlets, conduits, pipes, curbs, municipal streets, catch basins, gutters, ditches, pumping stations, manholes, structures, channels, retention or detention basins, infiltration areas, filtration systems and other structural components and equipment that are used for managing storm drainage or surface water. Stormwater Systems include both Public and Private Systems (City Code Sect. 5.75 Subd. 2).

Surface water or waters – All streams, lakes, ponds, marshes, wetlands, reservoirs, springs, rivers, drainage systems, waterways, watercourses, or irrigation systems, whether natural or artificial, public or private (City Code Sect. 5.75 Subd. 2).

Suspension Order – An official notice to a landowner of a violation of City Code, State Rules, or EPA statutes and regulations. The notice will describe the violations and instructions for coming into compliance.

Urbanized area – Land Area consisting of one or more places and adjacent urban fringe as defined by the United States Census Bureau. These areas contain at least 50,000 people and an overall population density of at least 1,000 people per square mile of land (Minn. R. 7090.0080).

Wastewater – Any water or other liquid waste, other than uncontaminated stormwater, that has been used, such as for washing, flushing, or in a manufacturing process, and so contains waste products, discharged from a facility and collected in a sewer system and conveyed to a sewage treatment plant for processing (City Code Sect. 5.75 Subd. 2).

Wellhead Protection Area – Areas designated as public health importance due to its proximity to a drinking water well. Areas are determined based on the geology and potential of contamination into the drinking water source (MDH 2015).

Wetlands – Area with saturated soils either above or just below the surface with plants that have adapted to the wet conditions (MnDNR 2015).

1.2 Abbreviations

BMP	Best Management Practice
DWSMA	Drinking Water Supply Management Area
EPA	Environmental Protection Agency
ERP	Enforcement Response Protocol
GIS	Geographic Information System
IDDR	Illicit Discharge Detection Response
MCM	Minimum Control Measure
MDH	Minnesota Department of Health
MnDNR	Minnesota Department of Natural Resources
MPCA	Minnesota Pollution Control Agency
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
SWPPP	Stormwater Pollution Prevention Program/Plan

1.3 About Illicit Discharge

Illicit discharges to storm sewer systems are caused by a variety of situations and can be described by the path of entry and by the pattern of flow.

- Flow can *directly* enter into the storm sewer system via an illegal connection or even by an approved connection that exceeds the effluent standards set by the permit issued. They can also *indirectly* enter the storm sewer system due to accidental leakage into inlets or infiltration with groundwater through joints or cracks in the sewer.
- Illicit discharges could be *intermittent*, (only occurring a few hours per day or a few days per year), *continuous*, or *transitory* (occurring only once).

Illicit discharges are considered “illicit” because the water is not treated for water quality impairments before entering receiving waters. An illicit discharge may contain compounds that have the potential to be harmful to the health or welfare of citizens, to the environment, surface waters, or the storm sewer system. The receiving waters could be recreational areas or eventual drinking water sources. Even well maintained separate storm sewer systems can contribute to water pollution and deliver heavy metals, oil, grease, solvents, nutrients, toxics, bacteria to downstream water bodies.

Common Sources of Illicit Discharges

Construction Sites

Construction sites are a common source of illicit discharges to storm sewer systems. Runoff from these sites can transport sediment, automotive liquids, hazardous materials, higher than normal pH conditions, or abnormal temperatures (Herrera 2011). Construction sites that disturb more than one acre of soil or pose a risk to water resources require a “NPDES Construction Stormwater General Permit” issued by the Minnesota Pollution Control Agency (MPCA). As a part of this permit, site owners and operators must develop a Stormwater Pollution Prevention Plan (SWPPP) that specify the erosion control and pollution reduction measures that will be taken to ensure contaminated stormwater does not leave the construction site. Some of the BMPs that may be required by construction sites include items such as silt fence, inlet protection, and containment of runoff from erodible surfaces.

Illegal Dumping

Illegal dumping often occurs by persons that are unaware of the laws and rules about disposal of certain liquids or solid waste. Some individuals may assume that all sewer drainage is treated in the same manner as sanitary wastewater, while others may deliberately and knowingly dispose of waste into storm sewers. Common examples of items that are dumped into storm sewers include paint, trash, used motor oil, automotive liquids such as antifreeze, wash water from services (concrete contractors, carpet cleaning operations), cooking oils, and grease.

Sanitary Waste

Sanitary waste (sewage) can enter storm sewer systems through a variety of ways. Failed utility components or broken pipes can be one pathway. For example, a blocked or broken sanitary sewer pipe, septic system, or pump station near a storm sewer system could lead to overflow or infiltration of wastewater to the storm sewer pipe. Another common way wastewater enters the storm sewer is when a connection from a home or business is made directly to a storm sewer. Often storm and sanitary sewers appear similar from the outside and contractors may connect to the wrong pipe, either accidentally or deliberately. While less common, recreational vehicle (RV) owners might dispose of sanitary waste into storm sewer systems.

Washing Activities and Improper Storage Containers

Commercial washing activities often result in a watery mix of detergents and solids that is called wash water. Wash water that drains directly to a stormwater system is considered an illicit discharge. Some examples include commercial vehicle washing and restaurant cleaning activities. Dumpsters or storage barrels that leak onto pavement are also illicit discharges. Storage containers should be covered and sealed to prevent or reduce rainwater from entering the container. Uncovered stockpiles of materials have potential to wash particles or other materials away from the stockpile and contribute to pollution in water bodies.

Car Accidents

Automotive fluids might enter storm drains after leaking from damaged vehicle parts or tanks. Liquids or materials in shipping containers also have the potential to leak or wash into the storm sewer system. Accidents taking place during rain events could make containment of these spills more difficult.

NPDES Permit Holders

Industrial, non-stormwater discharge to storm sewer is only allowed when the owner has an approved NPDES industrial permit which requires the site to meet water quality standards set by the MPCA before discharging to the storm sewer system. However, if the owner is exceeding the effluent limits set by the permit then they are illicitly discharging to the storm sewer. An example of exceeding NPDES industrial permit requirements could be an industrial facility that disposes of water with no chemical contaminants but at a very high temperature. Water quality standards typically set a required temperature limit that the facility is required to meet to discharge to the storm sewer. If the temperature limits are exceeded then it is considered illicit discharge.

1.4 Federal and State Requirement

The Federal Clean Water Act of 1972 made it unlawful to discharge any pollutant from a point source into navigable waters unless a permit was obtained. This permit program is called the National Pollutant Discharge Elimination System (NPDES). As part of the program, small cities are required to submit a Municipal Separate Storm Sewer System (MS4) General Permit which approves the discharge of stormwater to lakes, rivers, wetlands, and other receiving waters (EPA 2015). In Minnesota, the MS4 Permit is administered by the MPCA.

Eden Prairie is an Urbanized Area, as defined by the Bureau of the Census, due to its population and proximity to the Twin Cities metropolitan area. The City is classified as an NPDES Phase II community, more commonly referred to as a small MS4 community, and is therefore required to submit the MS4 General Permit. The MS4 Permits have six specific goals or Minimum Control Measures (MCM), within the permit's SWPPP, as listed below.

1. Public education and outreach
2. Public participation/involvement
- 3. Illicit discharge detection and elimination**
4. Construction site runoff control
5. Post-construction runoff control
6. Pollution prevention/good housekeeping

2.0 City of Eden Prairie

The City of Eden Prairie was recognized by Money Magazine in 2010 as a great place to work and live, ranking it as the “Best Place to Live in America” within its population category. It is located in the southwestern suburbs of the Twin Cities, in Hennepin County. The City is home to more than 60,000 residents and 2,800 businesses. Residents, neighbors, and visitors can enjoy nearly 5,500 acres of land designated for parks and open spaces, more than 120 miles of bike trails, and 17 recreational lakes. Protecting these resources has been a long-standing priority for the community.

The City’s Public Works Department includes staff in Engineering/Environmental, Utilities (water and sewer), Street Maintenance, and Fleet Services. The Environmental Coordinator, within the Engineering Division, manages the City’s MS4 General Permit and will develop and help lead the illicit discharge inspection, investigation, elimination, documentation, and educational procedures. The Engineering and Utilities staff will work most directly with illicit discharge issues but will coordinate with other City departments as needed. The Police, Fire, Community Development, and Parks and Recreation Departments are tasked with reporting sightings or concerns regarding illicit discharges and illegal dumping to the Engineering Division. The City will also work with outside agencies, as needed. This may include the MPCA, watershed districts, and MnDNR.

2.1 Analysis of Existing Conditions

The City of Eden Prairie has met previous MS4 SWPPP requirements and has mapped public storm sewer infrastructure, including constructed stormwater ponds, stormwater wetlands, and wellhead protection areas using Geographic Information System (GIS) software. See Appendix A-1 for a map of the storm sewer system, DWSMA boundaries, and wellhead protection areas. The City’s GIS data are regularly updated and verified through field inspections and information from as-built construction plans.

A Stormwater System Inventory Form has been used by the City since 2003 for storm sewer inspections. This inspection form is used to collect information on the storm sewer system and includes a section on determination of the illicit discharge potential from the site.

The City has development rules managing land alteration activities, a sump manhole inspection and cleanout schedule, and a street sweeping program. A Nondegradation Plan (Wenck 2008) was developed for the City to estimate the pollutant loadings to receiving waters. By 2020, the Plan predicts that more than 3.6 million pounds of total suspended solids and 13,000 pounds of total phosphorus will enter receiving waters from within city limits. Due to the fact that much of these loadings will be routed through the storm sewer system, Best Management Practices were proposed to minimize the impacts of land alteration activities.

City staff have actively promoted educational opportunities to staff and citizens regarding stormwater issues. They have used and continue to use mediums such as the “Life In the

Prairie” and “Living Green” newsletters, newspaper articles, cable access channel, workshops, and social media messages.

City Ordinance, Section 5.75, for Stormwater Illicit Discharge and Connections was developed by the City of Eden Prairie in June of 2012 and can be found in Appendix C-5. Some common examples of illicit discharge exemptions listed in the City Code include:

- Discharges that have an NPDES permit, Notice of Intent, waiver, or wastewater discharge order administered by the EPA or the MPCA
- Firefighting activities or other activities protecting public health and safety
- Water line flushing
- Landscape irrigation or lawn watering
- Residential and non-commercial car washing
- Foundation or footing drains that discharge uncontaminated groundwater
- Crawl space pumps
- De-chlorinated swimming pool water

2.2 Priority Area Identification

Illicit discharges have higher likelihood of occurrence in particular areas within a community. Risk factors for illicit discharge include commercial and industrial land uses, age of infrastructure, size of the drainage areas, presence of septic systems and environmental permit holders, and locations where past spills and illicit discharges have occurred. Areas within the City that are considered more vulnerable to pollutants include wellhead protection areas and natural resource protection areas. When identifying the priority areas within Eden Prairie, both the chance of occurrence and vulnerability were considered.

An Illicit Discharge Priority Area Map (Appendix A-2) and a High Priority Outfall Map (Appendix A-3) have been developed as tools for City officials. The development procedures for mapping can be found in Appendix A-4.

The Priority Area Map shows areas that have higher potential of illicit discharges and/or areas that would be considered vulnerable to pollutants. This map is a reference for City employees to quickly understand where the risk of an incident is higher or where an incident could more severely impact public safety and the environment.

The Outfall Priority Map draws attention to the likelihood of potential illicit discharge from “High” and “Moderate” outfalls in the City’s storm sewer inventory. The “High” priority outfalls were converted to an Outfall Report found in Appendix B-1. These outfalls have a greater potential of illicit discharges. The City will work to schedule inspections of those outfalls at times optimal for detecting illicit discharge with a goal of inspecting each a minimum of once per permit cycle. An Illicit Discharge Inspection Form has been developed that can be used for this purpose and can be found in Appendix B-2.

3.0 Procedures and Plans

3.1 Procedures

A general response procedure can be found in Appendix C-1 and contact information can be found in Appendix C-3. Eden Prairie Dispatch is the primary contact for initial reporting of illicit discharge. The Dispatch Responder will direct the calls as needed to technical and public safety officials depending on the time of day and the urgency of the report. If an illicit discharge is found by City staff they may choose to call the Engineering or Utility Division directly once they determine the nature and urgency of incident.

The mobile application, SeeClickFix, could be used by the public to report cases of illicit discharge. SeeClickFix can provide location information and a photo, if included by the submitter. City staff response time from a SeeClickFix report would likely be longer than a call to dispatch, and its use would typically not be encouraged as a reporting medium for discharges that could have significant impacts or require immediate attention.

Inspection for Illicit Discharges

The highest priority in the elimination of illicit discharge is to find continuous or intermittent discharges into the storm sewer system (CWP 2004). An Illicit Discharge Inspection Form, used specifically for high priority outfall inspections, can be found in Appendix B-2.

The High Priority Outfall Report (Appendix B-1) lists outfalls that are scheduled to be inspected at least once in the five year permit cycle for illicit discharges. When specifically looking for illicit discharge, inspections will be done during dry-weather conditions (at least 72 hours of no precipitation) or when the temperature is cold enough to prevent stormwater runoff when possible. Discharges from storm sewer during dry periods could be from an allowable source, so if suspected, source identification or testing of the discharge could be done to determine if pollutants are present.

City staff who work in the field are trained to recognize signs of illicit discharge. This is intended to ensure efficiency in the management of these issues. Informal assessments will be incorporated during maintenance and inspection activities and suspicious activity will be reported to the Engineering Division.

Reporting Illicit Discharges

Any storm sewer discharge with *high turbidity, odors, floatables, oil film, or unusual colors* should be reported to the City Dispatch (911) or the Engineering Division for further investigation. Other signs of a suspected illicit discharge could include unusual flows after a dry weather period or during cold winter months.

Reports of suspected illicit discharge may come from landowners, the general public, other governmental agencies, or city staff. Reports should be routed to the City of Eden Prairie's 911 Emergency Dispatch Call Center. The dispatch responder will ask initial informational

questions regarding the location, description, and caller's contact information. The Dispatch Center's procedure is located in Appendix C-2. The information gathered will be forwarded to the appropriate responders and to the Environmental Coordinator as needed for documentation.

The dispatch team will then assign a patrol officer, and either a staff member from the Engineering Division, the on-call Utility staff person or the Fire Department (depending on the day, time, and availability of staff) will visit the scene. The patrol officer would likely arrive quickly, and should confirm the observation, ensure public safety, and if possible, end any active illicit discharges. They should communicate any findings to the Engineering or Utility staff after the site is secure. The first person from the Engineering, Utility or Fire Department staff should:

- Determine the need for environmental mitigation
- Estimate the volume
- Collect a sample
- Take photos
- Track the source of the discharge

The Engineering Department and supporting Public Works staff will be responsible for investigating the source of the pollution.

Tracking the Source of Illicit Discharges

In the case of a confirmed illicit discharge by an unknown source, staff in the Public Works and/or Fire Departments will review known information available about the initial report of illicit discharge, available GIS information, and any other useful or historical reports of similar locations or circumstances.

The staff investigating the illicit discharge may have to trace the substance upstream through the storm sewer to possible inlet locations or land or business owners. To identify potential sources, city staff may use tools including:

- Televising the storm sewer
- Thermal imaging
- Water sampling
- Smoke or dye-testing

In the case of transitory illicit discharges, targeted public education and interaction is a useful tool in investigating a source or violator and eliminating future cases of an illicit discharge. An "Illicit Discharge Detection and Elimination (IDDE)" pamphlet has been developed to use as a general educational tool and can be found in Appendix D-2.

Elimination of Illicit Discharges

The process of eliminating an illicit discharge will depend on the source and its characteristics. City staff has the right to access, monitor, and sample all parts of the Municipal Storm Sewer System. If the City has been refused access to any private storm sewer system and is able to demonstrate probable cause of a violation or need to inspect due to overall public health, safety, and welfare, then the City may seek issuance of a search warrant. In the case of a known violation, the City may suspend stormwater system access as warranted by the City Ordinance on Illicit Discharge. If the violation constitutes “an immediate danger...the City is authorized to enter upon the subject property without giving prior notice and to take any and all measures necessary to abate the violation and/or restore the property” (City Code Sect. 5.75 Subd. 8).

In the case of *transitory or one-time occurrences* a Public Works or Police Department staff member will communicate with the violator regarding the legality and the consequences of the act. If the violator is an employee at a business, it is the responsibility of City staff to ensure the owner is aware of the issue and that the consequences of repeated action are understood. If the spill is greater than 5 gallons and considered a hazardous substance, the MPCA Duty Officer will be called to determine the process for containment and mitigation.

If *direct connections* are found by buildings inspectors, sewer televising, routine inspections, or reports of discharge at an outfall, the Public Works Department and Buildings Inspector should determine the owner of the connection. Direct connections to the storm sewer system, if needed, would require a NPDES Stormwater permit and must meet the City Code Chapter 3 “Municipal and Public Utilities – Rules and Regulations, Rates, Charges, and Collection” Requirements. In the case that the connection is considered illicit, the City may suspend the owner’s access to the Stormwater System or the city is authorized to enter the property and abate the problem if deemed a public health or environmental risk. The owner will be responsible for the cost of abatement as defined in City Code Section 5.75, Subdivision 10.

In the case of a *sanitary sewer leakage* the Engineering, Utilities, and/or Building Inspections staff will review the nature of the problem to ensure the cause of the leakage has been resolved. All infrastructure will be repaired and any other utilities, agencies, or businesses that are impacted must be notified.

If excessive *non-point source pollution* (animal waste, street runoff, yard runoff, trash) is identified, the City staff will determine if the problem can be reasonably corrected through education or maintenance.

Groundwater contamination can pose a challenge to the City and contaminated groundwater would be considered an illicit discharge upon entering the storm sewer system. The first step would be to determine the source and the severity of the contamination. The City will work with the appropriate agencies (the MPCA, MDH, or others), if needed, to contain and mitigate the spill.

Enforcement Response Procedure

Illicit discharge violations could include the following infringements, which are considered misdemeanor charges:

- Illegal disposal/dumping (City Code Section 5.75 Subd. 3)
- Illicit discharges and connections (City Code Section 5.75 Subd. 3)
- Public nuisance (Minn. Stat. 609.74)
- Dumping in streets (City Code Section 6.06 Subd. 3)
- Dumping on public property (City Code Section 9.34 Subd. 3)
- Theft (of services) (Minn. Stat. 609.52)
- Unlawful deposit of garbage, litter, or like (Minn. Stat. 609.68)

Enforcement actions taken can include:

- Verbal warning
- Suspension or Stop Work Orders
- Fines
- Reimbursement of the cost of abatement and/or monitoring
- Civil Action

Factors to consider in the selection of enforcement response include:

- Frequency of violations
- Other types of non-compliance
- Degree of impact to the environment and the community

In the case of a non-threatening connection on private property, a Suspension Order would be sent to the offender informing them of the violation(s) of the applicable statute or provision in the City Code. The Order may also include the cost of abatement, including administrative costs, and time limitations as described in Section 5.75 Subd. 10 of the City Code (Appendix C-5).

Documentation Procedures

The Engineering Department would be responsible for documenting known and suspected violations of illicit discharges in the municipal storm sewer system that are reported to the Public Works Department. Reports of illicit discharges may come from various sources and departments, and this department would ensure that the reports are completed and shared with the appropriate departments. This will allow the Engineering Department to track how and where illicit discharges occur in the City and how best to manage follow-up inspections and/or

monitoring. A follow-up inspection would occur at a time deemed necessary, if required, to determine if the activity persists beyond the first occurrence.

Engineering staff will document known information using an Illicit Discharge Incident Tracking Form (Appendix C-4) and/or the Illicit Discharge Inspection Form (Appendix B-2) upon inspection of the outfall where illicit discharge is suspected. The information collected can be compiled to update GIS maps or develop reports of incidents within the City, as needed.

3.2 Employee and Public Education

Field staff will be trained on illicit discharge by means of an in-person training or an employee training video that was created in conjunction with this plan. City procedures will be reviewed with employees, as well as the locations of reference materials and contact information. Additional reminders will be posted on the City's Intranet site and/or via email newsletters as needed. An educational email (E-blast) for City staff can be found in Appendix D-1.

This plan has been developed into an interactive PDF (E-guide) that will be made available on the City's intranet website. This Illicit Discharge e-guide performs similar to a website allowing the user to quickly find the information, forms, or procedures they may be looking for while in the field or responding to callers.

Public education on illicit discharge began in 2015 with an article in the *Living Green City* newsletter on how to report illicit discharges using the SeeClickFix application. The City will continue public education through the use of a variety of media; the type and nature of future distribution will be determined annually. Illicit discharge and other MS4 concerns will be communicated at public events as appropriate. An educational pamphlet has been developed for residents and businesses regarding illicit discharge (Appendix D-2). Three additional pamphlets addressing related stormwater issues, "Pet Waste and Water Pollution," "Stormwater Management," and "Working Together to Protect Stormwater Ponds" can be distributed as needed (Appendices D-3, D-4, and D-5).

3.3 Future Recommendations

The Engineering Department will review the illicit discharge inspection schedule and update records as needed. The IDDR Plan and E-Guide should also be updated as contact information changes and procedures are revised. Upon the next SWPPP Permit application, the program will be revisited to determine if strategies and procedures defined in this plan are being used and to see if measurable progress is being made in the City in regards to illicit discharge elimination.

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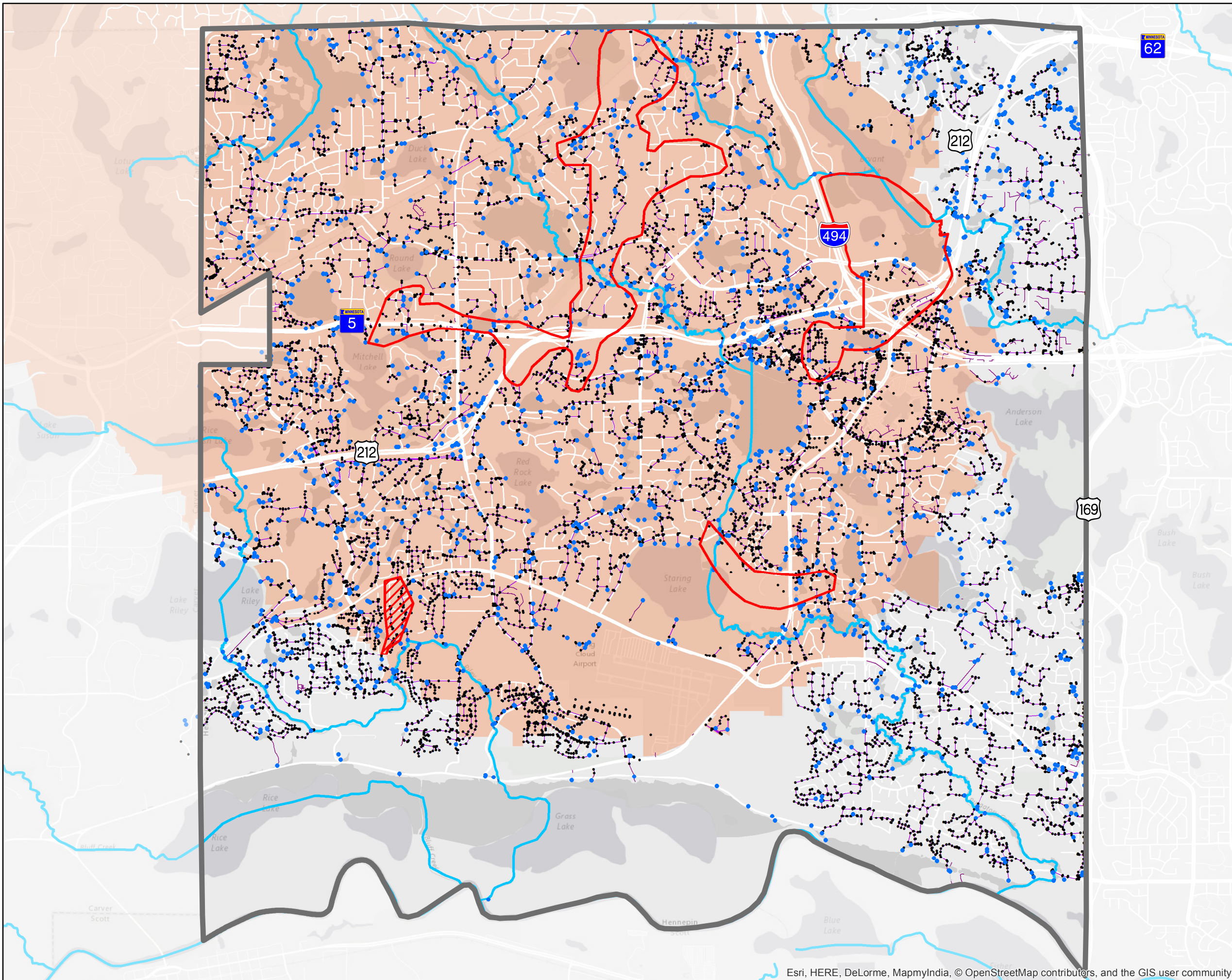
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Appendix A: Maps











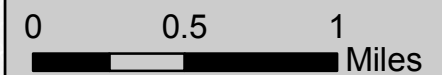
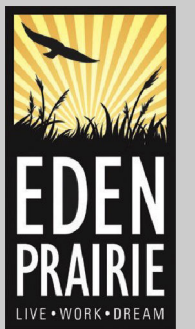
City of Eden Prairie

Illicit Discharge Detection Response Plan: Figure A-1

Storm Sewer and Drinking Water Protection Area Map

Legend

-  Drinking Water Supply Management Area
-  High Vulnerability Wellhead Protection Area
-  Moderate Vulnerability Wellhead Protection Area
-  Eden Prairie City Limits
-  Storm Sewer Outfalls
-  Storm Sewer Structures
-  Storm Sewer
-  Streams
-  Roads



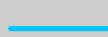



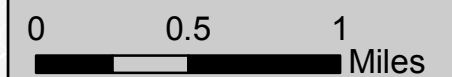
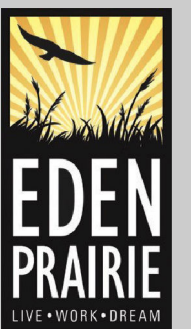
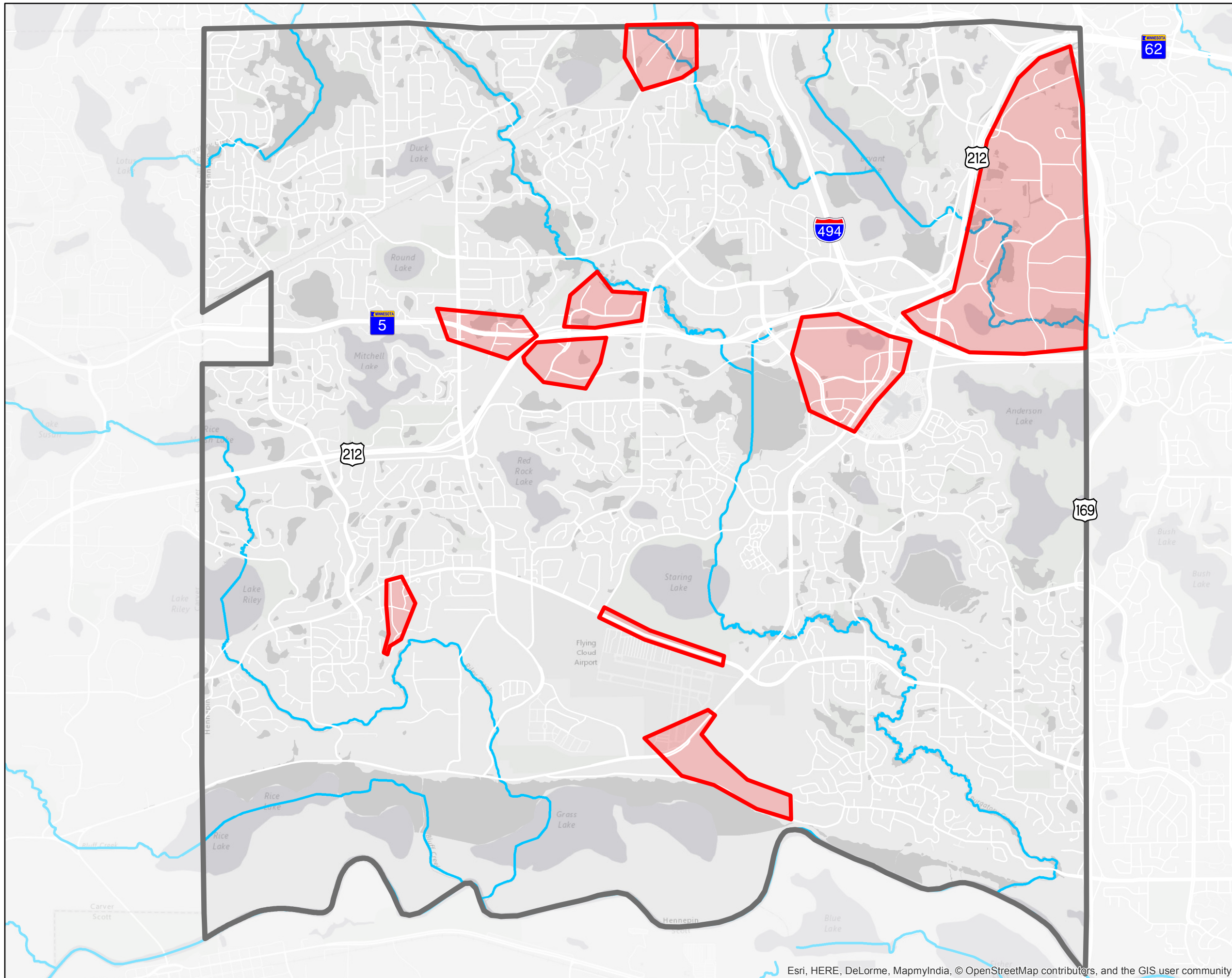
City of Eden Prairie

Illicit Discharge Detection Response Plan: Figure A-2

Illicit Discharge Priority Area Map

Legend

-  High Priority Area
-  Eden Prairie City Limits
-  Streams
-  Roads





City of Eden Prairie

Illicit Discharge Detection Response Plan: Figure A-3


High Priority Outfall Map


Legend

Priority Outfalls

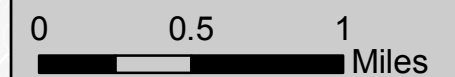
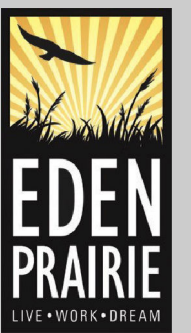
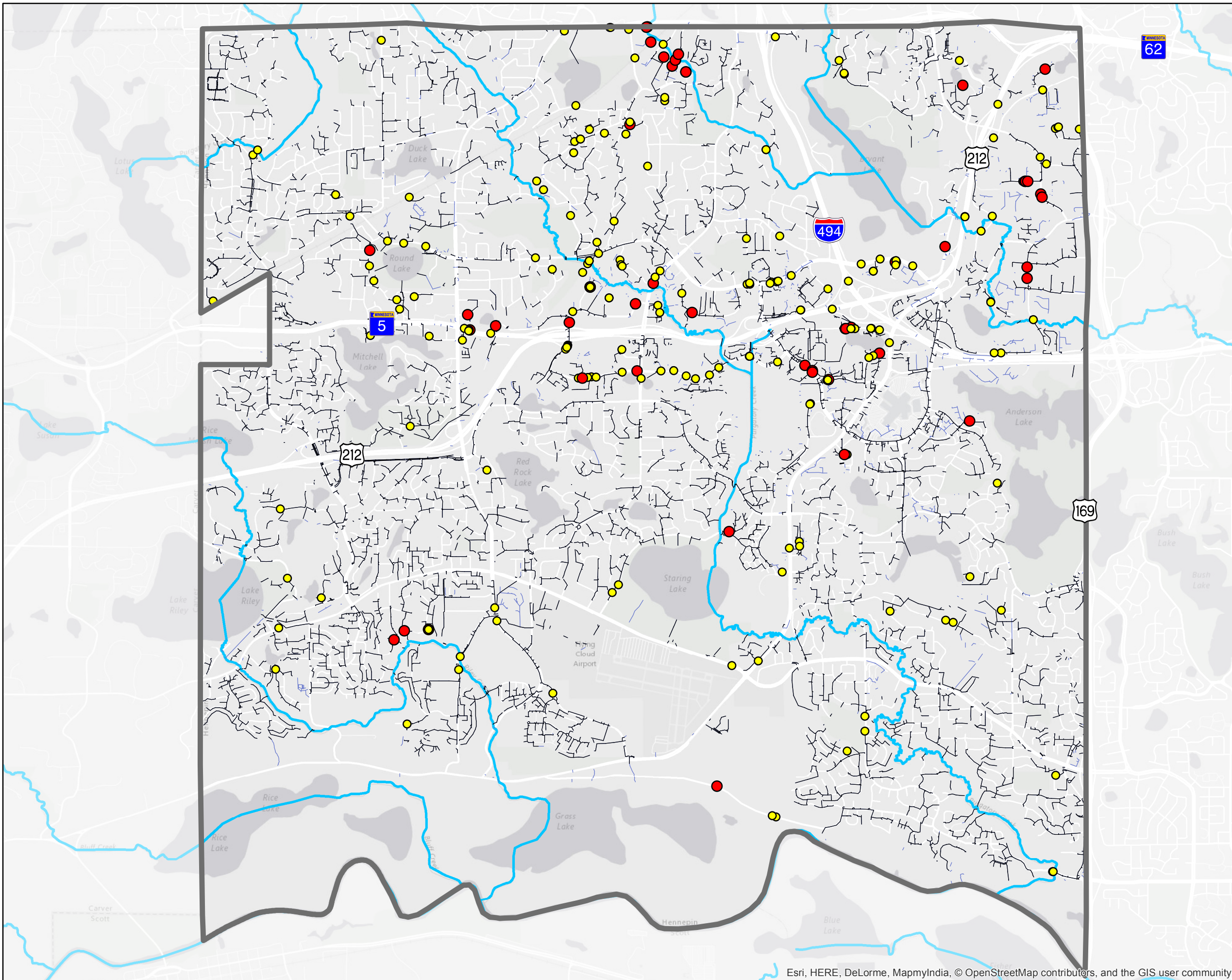
-  Moderate
-  High

 Eden Prairie City Limits

 Storm Sewer

 Streams

 Roads



Development Procedures for Mapping

Two maps were developed to manage illicit discharge in the City's stormwater system. The Illicit Discharge High Priority Area Map (Figure A-2) shows areas that are considered high priority due to the risk of illicit discharge and vulnerability to contamination in those areas. The Priority Outfall Identification Map (Figure A-3) labels specific storm sewer outfalls that rank highly when given points for risk and vulnerability factors. Those factors include:

- Wellhead Protection Areas (Medium Vulnerability x 1, High Vulnerability x 2)
- Industrial land use
- Reports of past spills and illicit discharge
- Age of the infrastructure
- Commercial land use
- Environmental permit holders
- Proximity to private septic systems
- Size of the drainage area
- Natural resource protection areas

These maps were developed using Geographic Information System (GIS) files. Most of the geographic information source data for the Priority Area and Priority Outfall maps, including the storm sewer infrastructure, wellhead protection, and septic system locations, were previously developed by the City of Eden Prairie. Land use information was based on the property description on Hennepin County's Tax Property Base Map.

The maps included in this report are based on information gathered in December 2014. Because these maps are regularly updated by City staff, the process for determining priority levels are outlined below and can be used to assess new and updated outfall structures as needed.

Priority Area Determination

Risk and vulnerability factors were overlaid with a degree of transparency to determine areas that had multiple and wide spread risk and vulnerability factors. The map was then simplified by drawing polygons around those areas with more highlighted features.

Priority Outfall Determination

The spatial data for storm sewer outfalls was provided by the City, with the file name "Plotted Inlets" referring to pond inlets or storm sewer outfalls. The GIS files were evaluated and amended to provide additional location information (an approximate address) and illicit discharge risk factors. The approximate address was found by a method known as reverse geocoding to more easily identify the outfall locations in the report. Outfalls were

given a “1,” “2,” or a “0” for each of the risk factors lists above. The value “2” was only used for High Vulnerability Wellhead Protection Areas. Table A-1 defines the sources and qualifiers of the data used in the analysis. Those points were summed to determine the outfalls with the highest risk, resulting in a value of “0” to “5” for each location.

To determine the outfalls that would be inspected specifically for illicit discharge, outfalls with “3” or more qualifiers were labeled as “High” Priority. The remainder of outfalls are ranked as follows: “2” as “Moderate Priority”, and “1” as “Low Priority” and “0” as “Very Low Priority.” “Low Priority” and “Very Low Priority” outfalls were not shown on the Priority Area Identification map.

Table A-1: Number of Qualifying Risk/Vulnerability Factors per Outfall Priority Designation

Number of Qualifiers	Designation
5	High Priority
4	
3	
2	Moderate Priority
1	Low Priority
0	Very Low Priority

Table A-2: Data used to Define Outfall and Area Risk Factors

Indicator of risk	From	Data source	Derived from Attribute	Notes
Commercial Land Use	Tax Property Base	Hennepin County	Property Description	Outfalls within 50 feet of the polygon feature or those draining the properties
Industrial Land Use	Tax Property Base	Hennepin County	Property Description	Outfalls within 50 feet of the polygon feature or those draining the properties
Age of infrastructure	StormLines & MasterStorm_Lines	City of Eden Prairie	Installation year: before 1985	Outfalls within 5 feet of the storm sewer line
Drainage Area	StormLines & MasterStorm_Lines & Plotted_Inlets	City of Eden Prairie	Size of Pipe: >36 inches	Outfalls with sizes labeled >36 inches
Wellhead Protection Area	DWMSA map	MDH until St. Croix Environmental	High and Moderate Areas	Outfalls within 50 feet of the polygon feature or those that drain to the area
Natural Resource Protection Areas	SRF shapefile of areas along the bluffs and the Bearpath bog	Discussion with the City on 12/19/14	N/A	Outfalls within the polygon feature
Outfalls draining properties with Septic Systems	Septic System and Storm Sewer Map	City of Eden Prairie	Properties with septic systems	Outfalls within 50 feet of or those that drain from the property's polygon feature
Past reports of illicit discharges or contamination	What's in my neighborhood dataset & City reports of ID	MPCA data, City data, and City staff interviews	Illicit Discharges and Active Petroleum Brownfield, Leak Sites, and Landfill Sites	Outfalls draining the point feature
What's in my neighborhood data	What's in my neighborhood dataset	MPCA	Hazardous Waste Large Quantity Generator, Industrial Stormwater Permit holders, Tank Sites (not including gas stations, schools), and Waste Water dischargers	Outfalls draining the point feature

Appendix B: Inspection

City of Eden Prairie
Illicit Discharge Detection Response Plan

High Priority Outfall Report (Appendix B-1)

Outfall ID	Address	Zip Code	Priority Factors	Commercial Zoning	Industrial Zoning	Aged Infrastructure	Large Drainage Area	Septic System	Natural Resource Protection	Vulnerability Wellhead Protection *	Past Spills or Contamination Site	Environmental Permit
14-21-A_0805	11993 TECHNOLOGY DRIVE	55344	5		X	X	X			Moderate		Tank Site, Ind SW Permit
03-22-C_1200	14367 62ND STREET WEST	55346	4	X	X						Leak Site	Ind SW Permit
03-22-A_0800	6419 HCRRRA CORRIDOR	55346	4		X	X				Moderate		Tank Site, Materials Storage
03-24-A_1000	6387 CARLSON DRIVE	55346	4		X	X		X				Tank Sites
12-31-A_0230	7430 GOLDEN TRIANGLE DRIVE	55344	4		X	X	X					Ind SW Permits, Tank Sites
12-12-A_0300	7078 SHADY OAK ROAD	55344	4		X	X	X					Ind SW Permit
15-14-A_0200	783 PRAIRIE CENTER DRIVE	55344	4	X		X	X					Tank Site
08-44-A_0700	16304 78TH STREET WEST	55344	3	X			X			Moderate		
08-44-A_1000	16331 WAGNER WAY	55344	3	X		X				Moderate		
29-21-A_1000	17135 CEDARCREST DRIVE	55347	3					X		High		
29-12-A_1200	16701 THOROUGHbred TERRACE	55347	3	X			X	X				
14-23-A_0300	12326 SINGLETREE LANE	55344	3	X			X			Moderate		
10-33-A_1030	7525 MITCHELL ROAD	55344	3	X		X	X					
08-23-A_1000	7381 HAMES WAY	55346	3	X		X	X					
11-14-A_0300	7434 BRYANT LAKE DRIVE	55344	3	X				X		Moderate		
08-44-C_0530	16030 VENTURE LANE	55344	3	X						Moderate	Illicit Discharge	
01-23-A_0600	6504 REGENCY LANE	55344	3		X	X	X					
03-22-C_1100	14373 62ND STREET WEST	55346	3	X	X						Leak Site	
22-13-B_0130	13488 STARING LAKE PARKWAY	55347	3				X			Moderate		Tank Site
14-23-C_1000	800 PRAIRIE CENTER DRIVE	55344	3	X						Moderate		Haz Waste LQG
14-23-C_0200	784 PRAIRIE CENTER DRIVE	55344	3	X						Moderate		Haz Waste LQG
11-34-C_0700	11966 TECHNOLOGY DRIVE	55344	3	X						Moderate		Tank Site
14-21-A_0500	7990 EDEN ROAD	55344	3	X		X	X					
14-21-A_0800	11991 TECHNOLOGY DRIVE	55344	3		X					Moderate		Tank Site, Ind SW Permit
16-14-B_0100	14407 TECHNOLOGY DRIVE	55344	3	X		X	X					
09-43-A_0800	7733 WALLACE ROAD	55344	3				X			Moderate		Ind SW Permits
04-41-B_0130	6755 HCRRRA CORRIDOR	55346	3	X		X				Moderate		
09-42-D_0900	7501 CORPORATE WAY	55344	3	X	X					Moderate		
09-42-D_1100	7501 CORPORATE WAY	55344	3	X	X					Moderate		
16-12-A_0630	14974 TECHNOLOGY DRIVE	55344	3		X					Moderate		Ind SW Permit
11-42-C_0600	7426 MARKET PLACE DRIVE	55344	3	X		X				Moderate		
14-34-A_1100	8405 CARDIFF LANE	55344	3			X					Pet Brownfield	Tank Sites, Haz Waste LQG
29-13-A_1000	17002 CEDARCREST DRIVE	55347	3					X		High		
13-32-A_0700	10882 KIAWAH DRIVE	55344	3	X		X	X					
10-34-A_0100	7770 EQUITABLE DRIVE	55344	3	X			X					Haz Waste LQG
09-44-A_1000	14486 MARTIN DRIVE	55344	3	X	X					Moderate		
03-22-G_0700	14300 TCW RAILROAD	55346	3		X					Moderate		Ind SW Permit, Landfill
03-24-A_0830	6477 CARLSON DRIVE	55346	3		X	X				Moderate		
03-24-A_0900.2	6429 CARLSON DRIVE	55346	3		X	X					Pet Brownfield	
03-24-A_0900.1	6431 CARLSON DRIVE	55346	3		X	X					Pet Brownfield	
03-24-A_1200.2	6301 TANAGER LANE	55346	3		X	X						Ind SW Permit

City of Eden Prairie
Illicit Discharge Detection Response Plan

Outfall ID	Address	Zip Code	Priority Factors	Commercial Zoning	Industrial Zoning	Aged Infrastructure	Large Drainage Area	Septic System	Natural Resource Protection	Vulnerability Wellhead Protection *	Past Spills or Contamination Site	Environmental Permit
03-24-A_1200.1	6301 TANAGER LANE	55346	3		X	X						Ind SW Permit
12-31-A_0400	7522 GOLDEN TRIANGLE DRIVE	55344	3		X		X					Ind SW Permits
12-12-A_0900	7066 SHADY OAK ROAD	55344	3		X	X	X					
12-21-B_1200	10363 70TH STREET WEST	55344	3		X	X						Ind SW permit
12-21-B-0100	10357 70TH STREET WEST	55344	3		X	X	X					
34-21-A_1200	13741 RIVERVIEW ROAD	55347	3		X			X	X			
01-11-B_0900	10000 CROSSTOWN CIRCLE	55344	3	X		X						Ind SW Permit
12-12-A_1200	10331 70TH STREET WEST	55344	3		X	X						Ind SW Permit

* "High" Vulnerability Wellhead Protection area counts as two factors and "Moderate" counts as one factor.

SECTION 1: BACKGROUND DATA

DATE:	TIME:	INSPECTOR:
RAINFALL (in.) Date _____ Amount _____	LAST 3 DAYS: Date _____ Amount _____ Date _____ Amount _____	WEATHER CONDITION: <input type="checkbox"/> Sunny <input type="checkbox"/> Cloudy <input type="checkbox"/> Partly Cloudy <input type="checkbox"/> Rainy <input type="checkbox"/> Winter evaluation <input type="checkbox"/> Other: _____ TEMPERATURE: (°F): _____
PHOTOS TAKEN: <input type="checkbox"/> Yes <input type="checkbox"/> No	RECEIVING WATER:	LAND USE: <input type="checkbox"/> Industrial <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Park
NEAREST PROPERTY ADDRESS/LOCATION NAME:		

SECTION 2: OUTLET DESCRIPTION

TYPE / SHAPE / SIZE OF OUTLET	Size (inches) Width/Height or Diameter: _____ Type / Shape: <input type="checkbox"/> Round <input type="checkbox"/> Arch <input type="checkbox"/> Box <input type="checkbox"/> Swale <input type="checkbox"/> Curb Cut <input type="checkbox"/> Other: _____ Material: <input type="checkbox"/> RCP <input type="checkbox"/> PVC <input type="checkbox"/> CMP <input type="checkbox"/> Earthen Swale <input type="checkbox"/> Galvanized <input type="checkbox"/> Concrete <input type="checkbox"/> Other Trash guard? <input type="checkbox"/> Yes <input type="checkbox"/> No Flared End? <input type="checkbox"/> Yes <input type="checkbox"/> No	
SUBMERGED	In water: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully With sediment: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully	Erosion: <input type="checkbox"/> Yes <input type="checkbox"/> No
SEDIMENT DELTA	<input type="checkbox"/> Yes Approximate measurements (feet): Depth _____ Length _____ Width _____ <input type="checkbox"/> No	
FLOW PRESENT?	Description: <input type="checkbox"/> Trickle <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> None	
Outfall Damage	<input type="checkbox"/> Yes <input type="checkbox"/> Spalling, Cracking or Chipping <input type="checkbox"/> Corrosion <input type="checkbox"/> Pipe/Trash Guard Separation <input type="checkbox"/> No	
Deposits/Stains	<input type="checkbox"/> Yes Description: <input type="checkbox"/> Oily <input type="checkbox"/> Flow Line <input type="checkbox"/> Paint <input type="checkbox"/> Other: <input type="checkbox"/> No	
Turbid/Cloudy Plunge Pool Below Outfall	<input type="checkbox"/> Yes <input type="checkbox"/> Odors <input type="checkbox"/> Color <input type="checkbox"/> Floatables <input type="checkbox"/> Oil Sheen <input type="checkbox"/> Suds <input type="checkbox"/> No <input type="checkbox"/> Excessive Algae <input type="checkbox"/> Other:	
Pipe Algae/Growth	<input type="checkbox"/> Yes <input type="checkbox"/> Brown <input type="checkbox"/> Orange <input type="checkbox"/> Green <input type="checkbox"/> Other: <input type="checkbox"/> No	

SECTION 3: PHYSICAL INDICATORS FOR OUTFALLS WITH WATER

INDICATOR	DESCRIPTION	SEVERITY
Odor of Water	<input type="checkbox"/> Sewage <input type="checkbox"/> Sulfide <input type="checkbox"/> Rancid/sour	<input type="checkbox"/> Petroleum/gas <input type="checkbox"/> Other: _____ <input type="checkbox"/> None
Color of Water	<input type="checkbox"/> Clear <input type="checkbox"/> Dark Brown/Tannic <input type="checkbox"/> Cloudy	<input type="checkbox"/> Muddy <input type="checkbox"/> Other: _____ <input type="checkbox"/> None
Floatables (Not including Trash)	<input type="checkbox"/> Paint <input type="checkbox"/> Sewage <input type="checkbox"/> Petroleum (oil sheen)	<input type="checkbox"/> Suds / Bubbles <input type="checkbox"/> Shine / sheen <input type="checkbox"/> Other: _____ <input type="checkbox"/> None
Trash or Debris	<input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Yard Waste <input type="checkbox"/> Metal <input type="checkbox"/> Mixed materials <input type="checkbox"/> None	<input type="checkbox"/> Plastics <input type="checkbox"/> Floating vegetation mats Other: _____

SECTION 4: ILLICIT DISCHARGE POTENTIAL

Do the screening results above suggest that an illicit discharge may be present? Yes No

If YES, follow up with investigation of the discharge and eliminating it at the source if possible.

1. Name of staff responsible for further investigating this illicit discharge: _____
2. Date this form was turned over for further investigation: _____

SECTION 5: PRIMARY SCREENING/SAMPLES COLLECTED

PRIMARY SCREENING PARAMETERS	FIELD TEST RESULT	INVESTIGATE FURTHER FOR ILLICIT DISCHARGE (Y/N)	EQUIPMENT
pH		<input type="checkbox"/> Yes <input type="checkbox"/> No	Field test strips
Temperature		<input type="checkbox"/> Yes <input type="checkbox"/> No	Temperature Probe
Turbidity/TSS		<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect Sample
Ammonia		<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect Sample
Fluoride*		<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect Sample
Free chlorine*		<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect Sample
Surfactants/detergents		<input type="checkbox"/> Yes <input type="checkbox"/> No	Collect Sample
* Do primary screening results suggest an illicit discharge is present?		<input type="checkbox"/> Yes <input type="checkbox"/> No	

* Temperature > 10° F warmer than normal for that waterbody and pH < 6.5 or > 8.5 indicate that illicit discharge could be present.

1. Sample collected for the lab?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1a. If yes, collected from:	<input type="checkbox"/> Flow <input type="checkbox"/> Pool Inlet or Outlet (ID#(s)): _____ <input type="checkbox"/> Other: _____	
2. Laboratory samples delivered to:		
3. Date samples delivered to laboratory:		

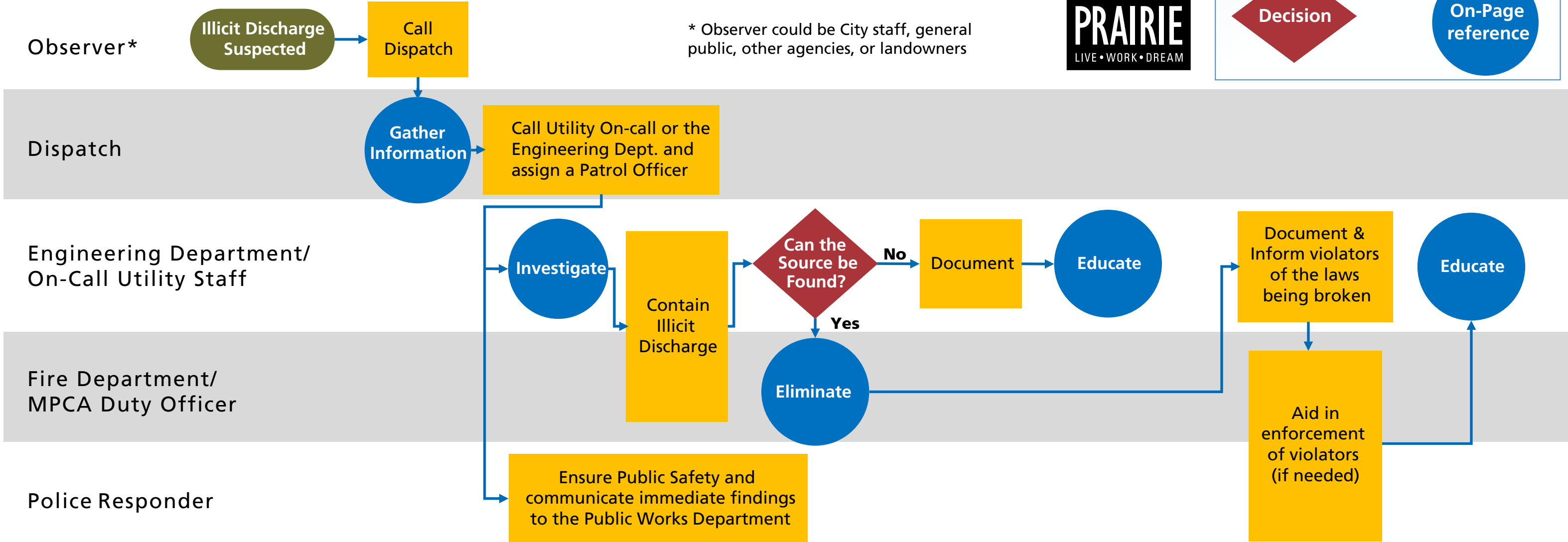
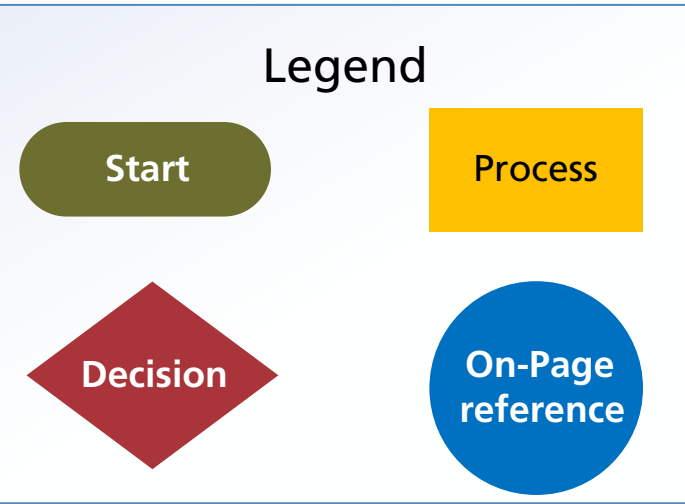
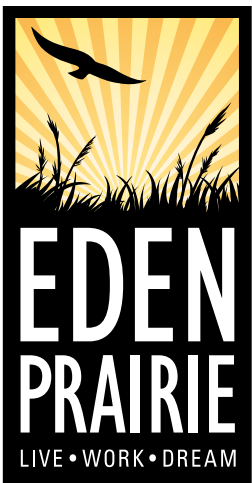
ADDITIONAL COMMENTS OR NOTES	
ANY NON-ILLICIT DISCHARGE CONCERNS (TRASH, VEGETATION, REPAIRS)?	

Provide a copy of this form to the Environmental Coordinator and Utilities Supervisor.

File location:

Appendix C: Response

City of Eden Prairie Illicit Discharge Detection Response Procedures



- Gather Information**
 - Name of Observer
 - Contact Information
 - Date
 - Location
 - Description of Illicit Discharge
 - In/Out of Grate/Pipe/Curb/Ditch?
 - Color/Odor
 - Quantity?
- Investigate**
 - Confirm Gathered Information
 - Collect any additional info
 - Investigate possible sources
 - Follow Upstream
 - Inspect Inlets
 - Take Samples of Discharge/Field Test kits
 - Dye testing
- Eliminate**
 - See Plan for Scenarios and Procedures
- Enforce**
 - See Plan for Scenarios and Procedures
- Educate**
 - Distribute Pamphlet
 - Talk to nearby land or business owners

Eden Prairie Police Department Procedure

Category: Polluting	
Subject: "Illicit Discharge" i.e. Polluting or Dumping into Storm Sewer System	
Date: 3/20/15	Submitted by: SRF Consulting Group
Reference:	Authorization:

Key Questions/Actions:

1. Name, address and phone number of caller.
2. Where is the discharge occurring?
3. Description of the Illicit Discharge.
 - Does the caller see the discharge going into or coming out of the storm sewer system? Is it a grate, pipe, curb, or ditch?
 - Does it have a color or odor? Please describe it.
 - Do they know who is dumping? Please describe the person/business.
4. Were you able to take a photo? If City staff, ask that they take a photo.

Dispatching the call:

1. Assign a Patrol Officer.
2. If during business hours call the Engineering Department (x8330). If outside business hours assign the Utility On-Call staff member.
3. Give out type of call, location and all pertinent information.
4. Perform status checks.

Pre-Arrival Instructions / Follow-Up Questions:

Information gathered should be shared with the Environmental Coordinator or Engineering Department staff and the Utility Department Supervisor for proper documentation and follow-up as needed for confirmed illicit discharges.

Illicit Discharge Detection Response Plan

Contact Information

Title	Agency	Name	Phone Number	Email
Dispatch, Emergency (24 hours)	City of Eden Prairie - Police		911	
Dispatch, Non-Emergency (24 hours)	City of Eden Prairie - Police		(952) 949-6200	
Engineering Department	City of Eden Prairie		(952) 949-8330	
Environmental Coordinator	City of Eden Prairie	Leslie Stovring	(952) 949-8327	lstovring@edenprairie.org
City Engineer	City of Eden Prairie	Rod Rue	(952) 949-8314	rrue@edenprairie.org
Utility Department			(952) 949-8530	
Utility Supervisor	City of Eden Prairie	John Carlon	(952) 297-5906	jcarlon@edenprairie.org
On-Call Utility Staff (24 hours)	City of Eden Prairie		Call 911 to be Transferred	
Fire Department			(952) 949-8361	
Assistant Chief – HazMat and Emergency Preparedness	City of Eden Prairie	Rik Berkbigler	(952) 949-8559	rberkbigler@edenprairie.org
Buildings Inspections Manager	City of Eden Prairie	Kevin Schmieg	(952) 949-8340	kschmieg@edenprairie.org
Duty Officer (24 hours)	MPCA		(800) 422-0798	

The SeeClickFix application can found at <http://www.edenprairie.org/i-want-to/report/maintenance-issue> or in your mobile App Store. This app will allows you to notify the City of maintenance concerns by letting you take a photo, describe the problem, and give a location.

1. INCIDENT LOCATION

Storm Sewer System Feature where Illicit Discharge was observed: <input type="checkbox"/> Outfall <input type="checkbox"/> Ditch <input type="checkbox"/> Catch Basin/Inlet <input type="checkbox"/> Curb <input type="checkbox"/> Wetland/Storm Pond <input type="checkbox"/> Street <input type="checkbox"/> Parking Lot <input type="checkbox"/> Other:	
Closest street address:	Business/Landowner name:
Brief description of incident/complaint:	Receiving Water (if known):

2. CITY PUBLIC WORKS RESPONDER INFORMATION

Call taken by:	Precipitation (inches) in past 24 – 48 hours;
Call time:	Outfall ID (if applicable):

3. REPORTER INFORMATION

Incident time:	Incident date:
Caller name & contact information:	

4. INVESTIGATION NOTES

Initial investigation date:	Investigators:
Methods Used: <input type="checkbox"/> Tracking <input type="checkbox"/> CCTV <input type="checkbox"/> Sampling <input type="checkbox"/> Thermal Imaging <input type="checkbox"/> Smoke/Dye testing <input type="checkbox"/> Other	
Notes:	

5. SOURCE INFORMATION

Is illicit discharge confirmed?
Is the dumped material known? If not, describe discharge:
Suspected violator (Name, personal or vehicle description, etc):
Enforcement action taken:

6. ENTITY RESPONSIBLE FOR CLEANUP AND/OR ELIMINATION

Business Name (if applicable):	Contact Person:
Telephone:	Email Address:

7. FOLLOW UP INSPECTION NEEDED? YES NO

Email this form to the Environmental Coordinator and Utilities Supervisor.
As needed, attached an Outfall Inspection Form and supporting documentation for filing.
File Location:

SECTION 5.75. STORMWATER ILLICIT DISCHARGE AND CONNECTIONS.

Subd. 1. Declaration of Policy and Purpose. The purpose of this section is to set forth minimum requirements for stormwater management that will diminish threats to public health, safety, public and private property, and natural resources of the community by establishing standards that protect the city's lakes, ponds, wetlands, and streams from pollutants carried in urban runoff. This ordinance establishes methods for controlling the introduction of pollutants into the Municipal Separate Storm Sewer System (MS4) in order to comply with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit process.

Subd. 2. Definitions. For the purposes of this Section, the following terms, phrases, and words shall have the meanings stated below.

- A. Illicit discharge. Any direct or indirect non-stormwater discharge to the storm sewer system except as exempted in Subd. 4 of this ordinance.
- B. Illicit connection. Any drain or conveyance, whether on the surface or subsurface, which allows an illegal discharge to enter the storm drain system including but not limited to any non-stormwater discharge such as sewage, process wastewater, and wash water, and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by an authorized enforcement agency.
- C. Municipal Separate Storm Sewer System (MS4). A stormwater conveyance or unified stormwater conveyance system (including without limitation roads with drainage systems, municipal streets, catch basins, stormwater detention facilities, curbs, gutters, ditches, natural or man-made channels or storm drains that are located within the corporate limits of Eden Prairie, MN and are owned or operated by the City, State, County or other public body.
- D. MPCA. The Minnesota Pollution Control Agency.
- E. NPDES. The National Pollutant Discharge Elimination System (NPDES) permit program which controls water pollution by regulating sources that discharge pollutants into waters of the United States.
- F. Pollutant. Any man-made or man-induced alteration of the chemical, physical, biological, thermal and/or radiological integrity of the water which has the potential to harm human life, aquatic life, terrestrial plant life and/or wildlife.
- G. Stormwater. Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation and resulting from such precipitation.
- H. Stormwater System. A Stormwater System includes any stormwater facility, drainage work or improvement that is designed to transport, convey or control the flow of stormwater or that improves or controls the water quality of stormwater. This shall include but is not limited to, outfalls, inlets, outlets, conduits, pipes, curbs, municipal streets, catch basins, gutters, ditches, pumping stations, manholes, structures, channels, retention or detention basins, infiltration areas, filtration systems and other structural components and equipment that are used for managing storm drainage or surface water. Stormwater Systems include both Public and Private Systems.
 - 1. Public Stormwater Systems are those Stormwater Systems that are under the control and/or ownership of the city, county, state or federal government. Public Stormwater Systems includes all Waters of the State located within the City that are used for managing the surface water system.

2. Private Stormwater Systems are those Stormwater Systems that are not under the control or ownership of the city, county, state and/or federal government.
 - I. Surface water or waters. All streams, lakes, ponds, marshes, wetlands, reservoirs, springs, rivers, drainage systems, waterways, watercourses, or irrigation systems, whether natural or artificial, public or private.
 - J. Wastewater. Any water or other liquid waste, other than uncontaminated stormwater, that has been used, such as for washing, flushing, or in a manufacturing process, and so contains waste products, discharged from a facility and collected in a sewer system and conveyed to a sewage treatment plant for processing.

Subd. 3. Stormwater and urban runoff control. All water entering the stormwater system will be protected from illegal disposal/dumping and illicit discharges and connections.

- A. Illegal disposal/dumping. No person shall throw, drain or otherwise discharge, cause or allow others under its control to throw, drain or otherwise discharge into a Stormwater System any pollutants or waters containing any pollutants other than stormwater.
- B. Illicit discharges and connections.
 1. No person shall cause any illicit discharge to enter a Stormwater System.
 2. No person shall use any illicit connection to intentionally convey non-stormwater to a Stormwater System.
 3. The construction, use, maintenance or continued existence of illicit connections to a Stormwater System is prohibited. This prohibition includes, without limitation; illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

Subd. 4. Exemptions. The following activities shall be exempt from Subd. 3.

- A. Discharge of non-stormwater discharge that is authorized by an NPDES permit, Notice of Intent, waiver, or wastewater discharge order issued to the discharger and administered under the authority of the U.S. Environmental Protection Agency (EPA) or MPCA,
- B. Firefighting activities or other activities necessary to protect public health and safety,
- C. Dye testing, but such testing requires written notification to the City Engineering Department prior to the time of the test,
- D. Water line flushing or flushing of other potable water sources,
- E. Landscape irrigation or lawn watering,
- F. Residential car washing,
- G. Diverted stream flows that have a Permit from the Minnesota Department of Natural Resources (DNR) or MPCA,
- H. Uncontaminated ground water infiltration,

- I. Foundation or footing drains that discharge uncontaminated groundwater,
- J. Crawl space pumps,
- K. Air conditioning condensation,
- L. Noncommercial washing of vehicles,
- M. Natural wetland flows,
- N. Dechlorinated swimming pool water,
- O. Street wash water discharged that is necessary for health or safety purposes and not in violation of any other provisions of city code,
- P. Flows from riparian habitats and wetlands, and
- Q. Any other water source not containing a pollutant.

Subd. 5. Good Housekeeping Provisions. Any owner or occupant of property within the City shall comply with the following good housekeeping requirements.

- A. No person shall leave, deposit, discharge, dump or otherwise introduce pollutants in an area where discharge to streets or the storm drain system occurs.
- B. For pools greater than 1,000 gallons in size, water shall sit a minimum of seven (7) days without the addition of chlorine to allow for chlorine to evaporate before discharge.
- C. Any facility subject to a MPCA General Stormwater Permit for Industrial or Construction Activity shall comply with all provisions of such permit including the creation of a Stormwater Pollution Prevention Plan (SWPPP). The Proof of Coverage from the MPCA of the Stormwater Permit must be submitted to the City before any discharge occurs under the permit. Proof of compliance with said permit shall be provided in a form acceptable to the city upon the City's request.
- D. As soon as any person responsible for a facility or operation has information of any known or suspected release of materials that are resulting or may result in illegal discharges or pollutants discharging into a Stormwater System, said person shall take steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of non-hazardous materials, said person shall notify the City in person or by phone or facsimile no later than the next business day.

Subd. 6. Public Waters Protection. Every person owning property through which Public Waters pass, as defined in Minn. Stat. §103G.005, Subd. 15, or such person's lessee, shall keep and maintain that part of the public waters within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the public waters. In addition, the owner or lessee shall maintain existing privately owned structures within or adjacent to public waters, so that such structures will not become a hazard to the use, function, or physical integrity of the public waters.

Subd. 7. Inspection, Monitoring and Testing.

- A. The city shall be permitted to enter and inspect all Stormwater Systems as necessary to determine compliance

with this ordinance. If security measures are in force which require proper identification and clearance before entry into its premises, the discharger shall make necessary arrangements to allow access to representatives of the City.

- B. Facility operators shall allow the city ready access to all parts of its Stormwater System for the purposes of inspection, sampling, testing, examination and copying of records that must be kept under the conditions of a NPDES Permit to discharge stormwater.
- C. The city shall have the right to set up at any Stormwater System devices necessary in the opinion of the City to conduct monitoring, sampling and/or dye testing of the facility's stormwater discharge.
- D. The city has the right to require the discharger to install monitoring equipment as the City deems necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the discharger at its own expense. All devices used to measure storm water flow and quality shall be calibrated to ensure their accuracy.
- E. If the city has been refused reasonable access to any Stormwater System and the City is able to demonstrate probable cause to believe that there may be a violation of this section, or that there is a need to inspect and/or sample to verify compliance with this chapter or any order issued hereunder, or to protect the overall public health, safety, and welfare of the community, then the city may seek issuance of a search warrant from any court of competent jurisdiction.

Subd. 8. Violations and Penalties. It shall be unlawful to violate any provision or fail to comply with any of the requirements of this ordinance.

- A. The city may, without prior notice, suspend Stormwater System access to any building/site when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the storm sewer system or surface waters.
- B. In the event the violation constitutes an immediate danger to public health or safety, the City is authorized to enter upon the subject property without giving prior notice to take any and all measures necessary to abate the violation and/or restore the property.
- C. Failure to comply with a suspension order issued in an emergency will result in any process deemed necessary to prevent or minimize damage to the storm sewer system or surface waters, or to minimize danger to persons.

Subd. 9. Violation deemed a Public Nuisance. In addition to the enforcement processes and penalties provided, any condition caused or permitted to exist in violation of any of the provisions of this ordinance is a threat to public health, safety, and welfare, and is declared and deemed a nuisance, and may be summarily abated or restored at the violator's expense, and/or a civil action to abate, enjoin, or otherwise compel the cessation of such nuisance may be taken.

Subd. 10. Cost of Abatement of the Violation. Within 30 days after abatement of the violation, the owner of the property will be notified of the cost of abatement, including administrative costs. The property owner may file a written protest objecting to the amount of the assessment within 7 days. If the amount due is not paid within a timely manner as determined by the decision of the municipal authority or by the expiration of the time in which to file an appeal, the City may assess the charges against the property. Any person violating any of the provisions of this article shall become liable to the city by reason of such violation.

Subd. 11. Remedies not Exclusive. The remedies listed in this ordinance are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of the city to seek cumulative remedies. The City may recover all attorney's fees court costs and other expenses associated with enforcement of this

ordinance, including sampling and monitoring expenses.

Subd. 12. Compatibility with Other Regulations. This ordinance is not intended to modify or repeal any other ordinance, rule, regulation, or other provision of law. The requirements of this ordinance are in addition to the requirements of any other ordinance, rule, regulation, or other provision of law, and where any provision of this ordinance imposes restrictions different from those imposed by any other ordinance, rule, regulation, or other provision of law, whichever provision is more restrictive or imposes higher protective standards for human health or the environment shall control.

Subd. 13. Severability. If any provision of this ordinance is found to be invalid for any reason by a court of competent jurisdiction, the validity of the remaining provisions shall not be affected.

Subd. 14. Ultimate Responsibility. The standards set forth herein and promulgated pursuant to this ordinance are minimum standards; therefore this ordinance does not intend or imply that compliance by any person will ensure that there will be no contamination, pollution, or unauthorized discharge of pollutants.

Source: Ordinance No. 13-2012
Effective Date 06-14-2012

(Sections 5.76 through 5.98, inclusive, reserved for future expansion.)

SECTION 5.99. VIOLATION A MISDEMEANOR.

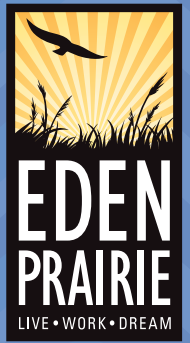
Every person violates a section, subdivision, paragraph or provision of this Chapter when he performs an act thereby prohibited or declared unlawful or fails to act when such failure is thereby prohibited or declared unlawful, and upon conviction thereof shall be punished as for a misdemeanor except as otherwise stated in specific provisions hereof.

Source: City Code
Effective Date: 9-17-82

Appendix D: Educational Materials

ILLCIT DISCHARGE

Detection and Elimination



As a part of the Municipal Separate Storm Sewer System (MS4) Permit, the City of Eden Prairie must meet requirements set by the Minnesota Pollution Control Agency (MPCA) to discharge stormwater into Minnesota's streams, lakes or wetlands.



One of the requirements is the detection and elimination of pollutants entering the storm sewer system. Minnesota's public waters are sources of drinking water and provide recreational opportunities like swimming, boating and fishing, which can all be negatively impacted if pollutants travel here by stormwater.

Illicit Discharge

Illicit discharge is any discharge to the storm sewer system that is harmful to the health or welfare of citizens, the environment, surface waters or storm sewer system. Illicit discharges would include items such as:

- Sewage from broken sewer lines or overflow from private septic systems
- Pesticides, herbicides, wash water from cleaning up paint, household cleaners or others
- Sediment washing from construction sites
- Chemical or oil spills



Illicit discharges could be **intermittent**, only occurring a few minutes per day or a few days per year, **continuous**, occurring almost daily, or **transitory**, only occurring once.

What incidences are not considered illicit discharges? Items like water line flushing, residential car washing or draining swimming pools that are de-chlorinated (left to rest for 7 or more days after treatment) are not classified as illicit.

What Do I Do if I Suspect an Illicit Discharge is Present?

All City employees can help. Although illicit discharge detection is incorporated into all inspection and maintenance activities, employees may not be present at a certain time. If you notice storm sewer discharges with unusual **odors**, **floatables**, **oil film** or **atypical coloring** you should:

- Estimate the volume or area impacted, as well as the location
- Take photos
- Contact the Engineering Department to report the problem or call 911 if you suspect the issue needs immediate attention



City staff can then evaluate the situation and determine if testing is needed to see if pollutants are present.

The City will be working with a consultant during the 2014–15 winter months to develop an Illicit Discharge Detection and Response Plan. For questions regarding the City of Eden Prairie's responsibilities, or if you are interested in being a part of the planning process, please contact your supervisor or **Leslie Stovring**, environmental coordinator, at lstovring@edenprairie.org or **952-949-8327**.

ILLICIT DISCHARGE

Detection and Elimination



The City of Eden Prairie is working to eliminate illegal dumping into its storm sewer system. Minnesota's public waters are sources of drinking water and provide recreational opportunities such as swimming, boating and fishing, which can all be negatively affected by the pollutants stormwater carries.



Damage to a stream after rinsing blue paint into a storm drain.

NEED MORE INFORMATION?

To learn about proper disposal methods for liquids such as paint, visit hennepin.us/greendisposalguide.

Illicit Discharge

Illicit discharge is any discharge to the storm sewer system that is harmful to the health or welfare of people, the environment, wildlife or surface waters. Illicit discharges include items such as:

- Sediment washing from construction sites
- Chemical or oil spills
- Sewage from broken sewer lines or overflow from private septic systems
- Pesticides, herbicides, wash water from cleaning up paint and household cleaners



Illicit discharges could be **intermittent** — only occurring a few minutes per day or a few days per year, **continuous** — occurring almost daily or **transitory** — only occurring once.

Which activities are not considered illicit discharges? Water line flushing, residential car washing or draining swimming pools that are dechlorinated (left to rest for seven or more days after treatment), firefighting and lawn watering are not considered illicit.

How Does a Small Amount Affect the Environment?

It only takes a very small amount of many types of chemicals to harm fish, plants and other aquatic organisms. For example, just 1 teaspoon of mercury is enough to contaminate more than 13 Olympic-sized swimming pools of drinking water. And most contractors know that rinsing concrete equipment into a lake or stream can kill fish. This is because the liquid can dramatically change the pH of water, making it very alkaline.

Most of these chemicals enter our water systems through improper or accidental disposal outside.

What Do I Do if I Suspect an Illicit Discharge is Present?

If you notice illegal or suspicious dumping into a storm sewer inlet or curb ditch, you should report the problem in one of the following ways:

- Call the City's Engineering Division at **952-949-8330**
- Call **911** if you suspect the issue requires immediate attention
- Use the **EP SEE CLICK FIX** app that is downloadable to your mobile device or visit edenprairie.org/EPSECLICKFIX



PET WASTE AND WATER POLLUTION



Dogs in Eden Prairie produce up to 4 tons of waste each day. Unfortunately, pet waste left on the ground washes into storm drains and waterways, exposing humans, pets and wildlife to harmful bacteria and other contaminants.



NEED HELP MANAGING PET WASTE?

There are many pet waste removal services available which can be found online. For more information, call the City's Engineering Division at **952-949-8330**.

What is the City's policy on pet waste?

Eden Prairie's City Code states that pet owners cannot leave waste on public or private property without permission from the owner. While it is not illegal to leave pet waste in your own yard, the City asks that you pick up after your pooch to reduce the movement of bacteria into water or into areas where it can be stepped on.

How does pet waste in my yard pollute water?

When pet waste is left on a lawn and is later rained on, it leaches bacteria, viruses and parasites (such as worms and giardia) into storm water, which can threaten the health of humans and animals. Pet waste also contains nutrients that promote weed and algae growth in lakes and rivers. This is the same as when too much fertilizer is used – it turns waterbodies into a mucky, green color. Picking up dog waste helps keep our recreation areas clean, safe and beautiful.



What about all the other animals?

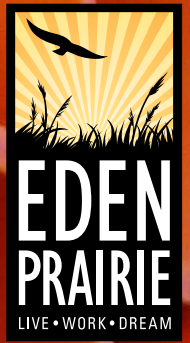
It is true that squirrels, geese and other wildlife also contribute to water pollution. However, these animals tend to spread out waste across the landscape, whereas dog waste tends to be concentrated in yards, pens and along sidewalks or paths. Cats usually bury their waste, so it does not get into waterways as easily.

How do I properly dispose of pet waste?

When nature calls, the best option is to flush pet waste down the toilet where it will be treated at the sewage treatment plant just like human waste. You can always just pick it up in a plastic bag and throw it in the garbage.



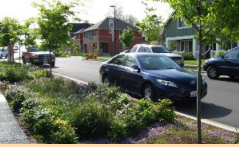

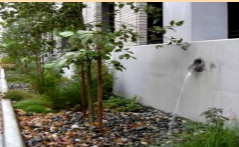

STORMWATER MANAGEMENT



The City of Eden Prairie encourages residents to help the City and local watershed districts manage stormwater and protect our waterways.

Over time, more impervious surfaces, such as roads, rooftops and parking lots, have been built around the City. These surfaces do not allow rain to absorb into the ground, resulting in larger amounts of water flowing more quickly to a downstream creek, wetland, pond or lake than it would in a natural prairie or wooded landscape.

Large rainstorms can lead to flooding and erosion in downstream channels. Stormwater is also a leading transporter of pollutants from our streets. Homeowners can help protect valuable property and enhance water quality at the same time by using the methods listed below.

Best Management Practices (BMP)	Downstream Benefits	Water Quality Benefits	Groundwater Benefits	
Rain gardens or vegetated ditches	Reduces the amount and speed of runoff	Filters the runoff and allows plants to consume excess fertilizers	Recharges groundwater, if infiltrated	
Rain barrels	Reduces amount of runoff	Reuse of stormwater	Conserves water	
Redirecting downspouts from impervious surfaces to vegetated areas	Allows infiltration and reduces the speed of runoff	Allows filtering of runoff to remove pollutants	Cleans surface water before it infiltrates to groundwater	
Pervious pavements or pavers in place of asphalt or concrete	Allows infiltration and reduces the speed of runoff	Allows filtering of runoff to remove pollutants	Cleans surface water before it infiltrates to groundwater	

REBATES MAY BE AVAILABLE

To learn about stormwater management rebates, visit edenprairie.org/waterrebates

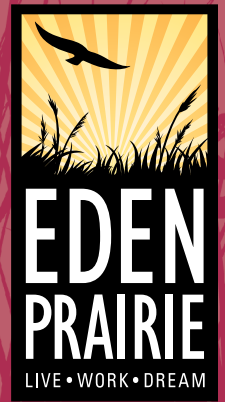
If watershed district rules require you to design and implement a **Stormwater Best Management Practice (BMP)** on your property, contact your watershed district for more information regarding which BMPs meet that requirement. Rebate and cost-sharing programs may be available through the City or watershed district. To protect drinking water, there may be restrictions on the types of BMPs that can be used to recharge groundwater.

Contact the Engineering Division at **952-949-8330** before designing a rain garden or other infiltrating BMP. The **Minnesota Pollution Control Agency's Stormwater Manual** (stormwater.pca.state.mn.us) is a great resource and has more information on design standards and additional BMPs.

For more useful stormwater management information, visit edenprairie.org/stormwater.

Working Together

TO PROTECT STORMWATER PONDS



Stormwater ponds and wetlands are designed to intercept and treat stormwater.

Algae blooms or aquatic plants in ponds and lakes need nutrients to grow. Pollutants or nutrients entering a pond through stormwater runoff can lead to large algae blooms, excess plant growth or even hurt wildlife.



An overabundance of plant and algae growth may inhibit a stormwater pond's function and degrade the pond's water quality. More importantly, however, the degradation of a stormwater pond results in polluting the watershed, or drainage area, around a lake, creek, wetland or pond. This negatively affects water quality, which has an adverse effect on plant and animal life, and decreases the recreational potential for lakes and creeks.

Property Owner Responsibility

- Pick up or rake up trash, leaves and grass from yards, streets and curbs.
- Never dispose of yard waste (or anything else) into ponds and storm drains – the waste contains phosphorus, which causes plants and algae to grow.
- Use biodegradable soaps for outdoor cleaning or car washing
- Sweep driveways and sidewalks instead of hosing them off.
- Pick up pet waste and dispose of it in the trash.
- Maintain healthy sod and grass to limit erosion. Re-seed or re-sod all bare areas to keep stormwater from washing soil particles, which also contain phosphorus, into a storm sewer or pond.

City Responsibility

The City does not treat stormwater ponds or wetlands for algae, weeds, odors or other aesthetic problems, however the City is responsible for the following tasks:

- Maintenance of the "hydraulic and treatment function" of water resources that are located within City-owned property, drainage or utility easements.
- Removal of sediment accumulation, obstructions and debris that impede the flow of water, and clearing clogged stormwater pipes.

Pollutants that should not be washed into our ponds include:

- Lawn-care products such as fertilizers or pesticides
- Animal debris or waste
- Lawn clippings
- Oils, greases and automotive additives
- Dust and dirt from construction, streets or rainfall
- Wind-blown chemicals

CITY RESOURCES

Utilities Division

Assistance with repairs
952-949-8530

Engineering Division

Drainage concerns
Boundary locations
952-949-8330

Environmental Coordinator

Vegetation management
permit application
Report dumping of pollutants
such as motor oil or paint
952-949-8327

WEB-BASED RESOURCES

Department of Natural Resources

dnr.state.mn.us/waters

Department of Agriculture

mda.state.mn.us/protecting

Hennepin County

hennepin.us

University of Minnesota Extension

extension.umn.edu

Blue Thumb

bluethumb.org



For more information about protecting our environment in Eden Prairie, visit edenprairie.org/livinggreen.