

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

Date: June 25, 2012

Permit Number: INR040124

MS4 Name: Lake County

County: Lake

MS4 Operator or Coordinator: George VanTil, Lake County Surveyor

Present at Audit: Dan Gardner, MS4 Coordinator, John Sabo, Neil Anderson, Frank Steward, Consultant, DLZ, and Heather Buck, Consultant, CBBEL

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"/> | |
|-------------------------------------|--------------------------|--------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (1) The SWQMP includes a strategy/ 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 system map showing the location of all outfalls and MS4 conveyances in the MS4 area has been completed and a copy provided for review. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (3) Were all known outfall conveyance systems with a pipe diameter of 12 inches or larger and all open ditches with a 24-inch bottom width or larger mapped? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (4) Were all remaining outfall conveyance systems mapped or a plan developed to complete the mapping? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (5) Has the MS4 has 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"/> | (6) 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"/> | (7) The MS4 provided a copy of their plan to locate, eliminate, and prevent illicit discharges to the MS4. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (8) The MS4 provided 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"/> | (9) The MS4 provided a field-screening plan and timetable for dry weather screening and testing if required. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (10) The MS4 identified the level of screening used and the documentation of the outfall screening. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | (11) 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"/> | (12) The MS4 provided documentation that they reviewed the IDDE plan for adequacy and accuracy and updated it if necessary. |

S M U NA

- (13)** 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?
- (14)** Did the MS4 develop a process for the facilitating and reporting of illicit discharges by the public?
- (15)** Is there a recycling program in place in the MS4 area for commonly dumped wastes, such as motor oil, antifreeze, and pesticides?

Comments:

- A comprehensive stormwater infrastructure map is complete, including all outfalls and MS4 conveyances
- A comprehensive storm water ordinance is in place that includes regulations to prevent, detect, and address storm water discharges, the signatory page was missing and will be emailed to IDEM.
- The IDDE ordinance includes enforcement actions through penalties for violations, the Lake County Health Department assists with enforcement
- Lake County collaborates with other agencies for a comprehensive recycling program
- All active industrial facilities with the MS4 area have been identified and a list is kept
- The MS4 will review the goals of the IDDE program and include updates in the 2012 MS4 Annual Report
- Lake County was well prepared for the audit and supplied all requested documents and materials

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 applicable land use data, mapping of all outfalls and MS4 conveyances for the 12-inch pipes and 24-inch ditches is complete and the mapping of the remaining outfalls smaller than 12/24 is complete.

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 **(80% of Smaller outfalls mapped, to be completed in 2012)**

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 _____, unless otherwise noted.

1. There are no additional requirements at this time.

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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