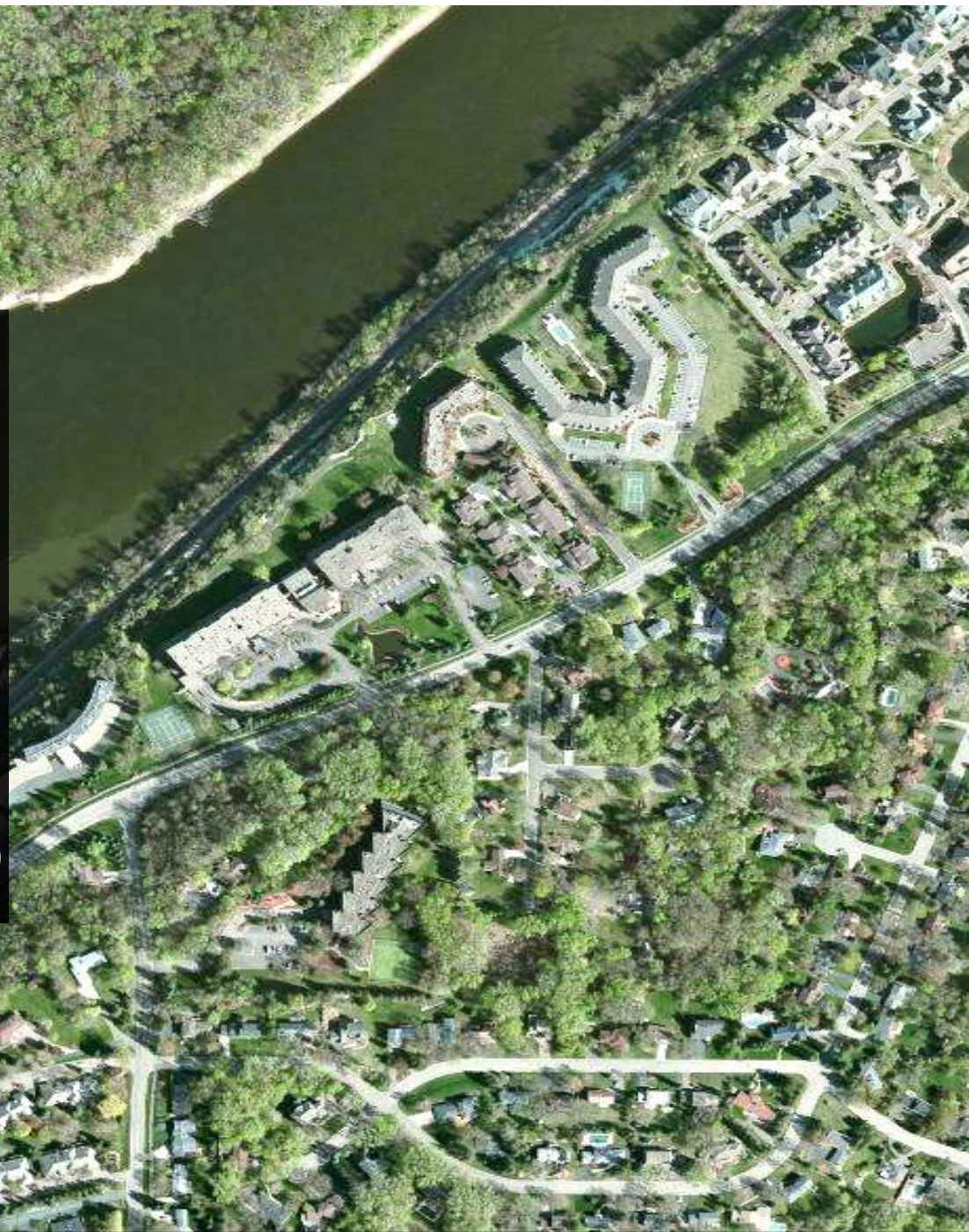




Frederick County's Stormwater Illicit Discharge Detection and Elimination Program

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Agenda



About Our Office

Our key focus areas revolve around sustainability and watershed management.



About the IDDE Program

A three part program to identify and eliminate potential pollution sources.



Program Protocols

Identification and investigation procedures for each of the parts of the program.



Program Ordinance

An ordinance that grants the manager right of entry and enforcement mechanisms as necessary.



The General Industrial Discharge Permit

A permit for stormwater discharges associated with industrial activity.

Frederick County's Office of Sustainability and Environmental Resources

offers practical solutions for protecting the environment, conserving energy, and living sustainably in Frederick County, Maryland.



Sustainability

Focuses include coordination of programs related to:

- energy efficient home improvements;
- and residential energy efficiency best practices through the Green Homes Challenge.

Other duties include supporting the Frederick County Sustainability Commission and grants for the purchase of County electric buses



Environmental Resources

Focuses include:

- conserving Frederick County's open space,
- controlling urban runoff,
- and restoring Frederick County's watersheds

through the National Pollutant Discharge Elimination Systems (NPDES) Municipal Separate Storm Sewer System (MS4)

OSER also assists in meeting the State's Chesapeake Bay Nutrient and Sediment Reduction requirements.

Illicit Discharge Detection and Elimination (IDDE) Program

A three-part program that meets requirements to implement an inspection and enforcement program to ensure that all discharges to and from the MS4 that are not composed entirely of stormwater and either permitted by MDE or eliminated.

Outfall Screening

Systematic – Prioritizes and screens 100 outfalls, 72 hours after a rain event to actively find cases of dry-weather flow.

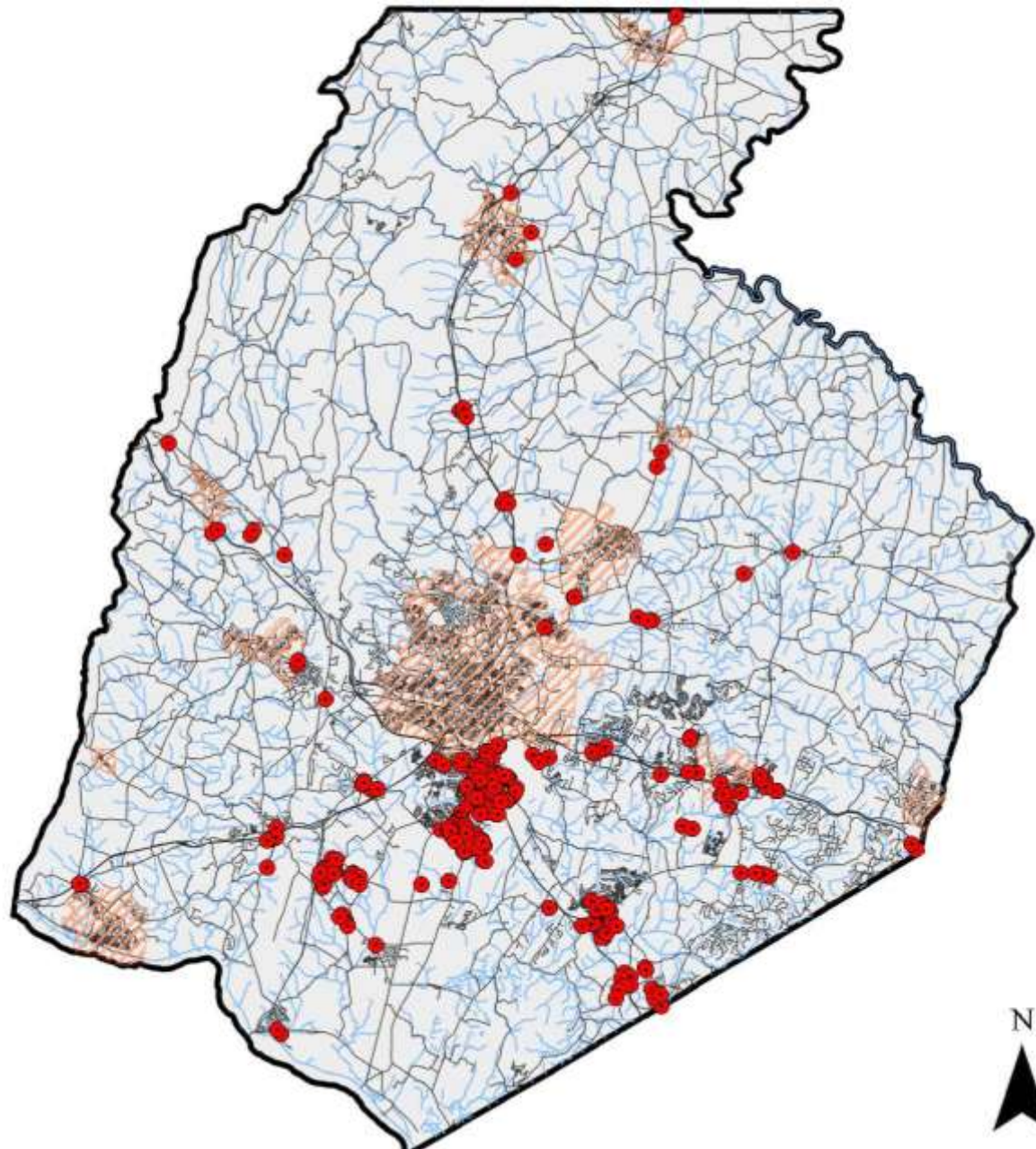
Episodic – Screens suspected outfalls observed to have dry-weather flow during other County activities or reported by citizens.

Hotspot Inspections

Visually surveys prioritized commercial and industrial facilities for the potential of pollution or illicit discharge based on their facility activities.

Citizen Case Reports

Investigates and documents the source and elimination of potential illicit discharges from citizen complaints or complaint referrals.



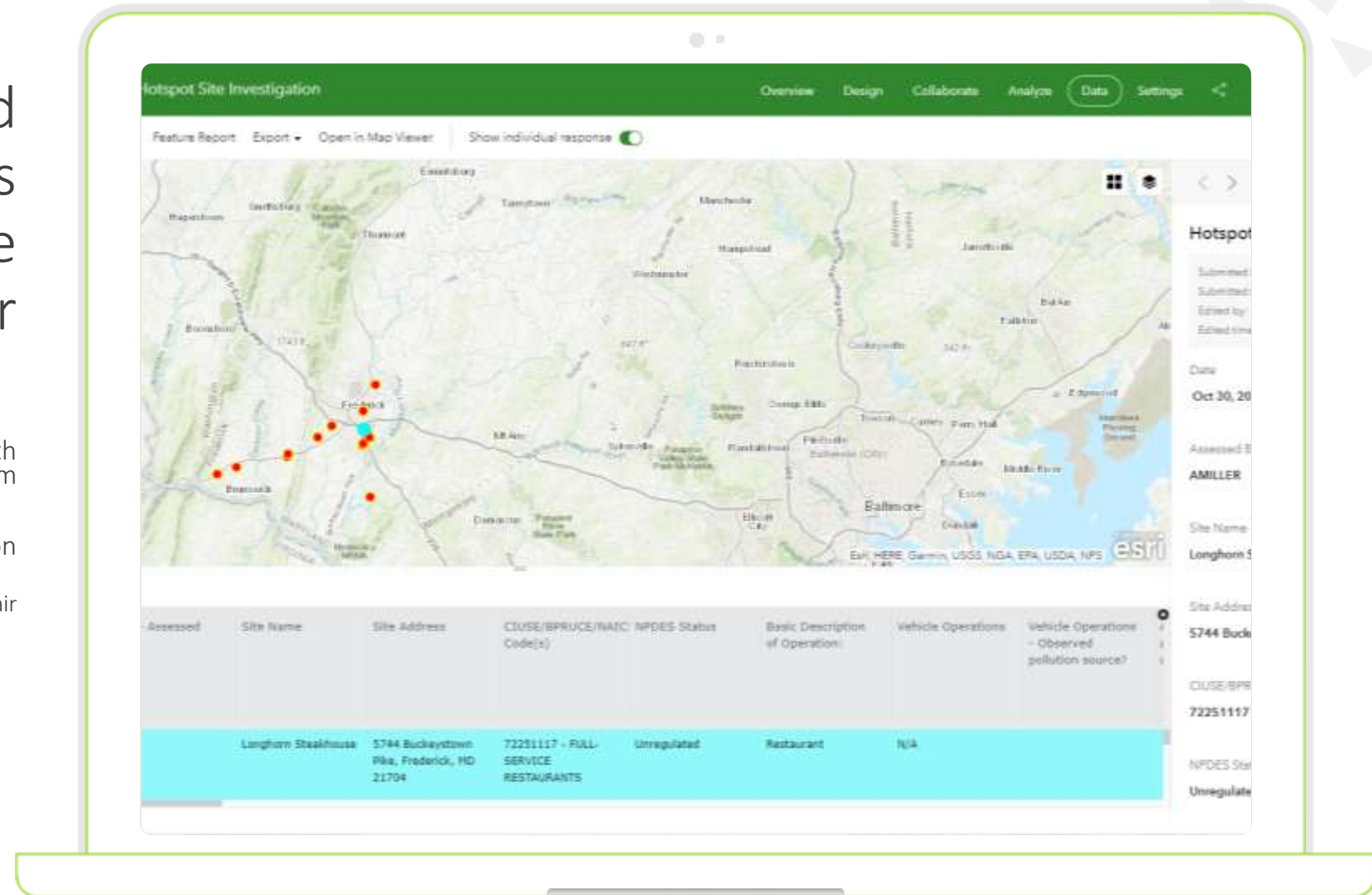
Outfall Screenings

- Identified based on proximity to the Hotspot Surveys, and on a criteria of:
 - suspected or known violations
 - never been inspected
 - have been recently mapped in the County GIS
 - due for regular inspection
- Screened at least 72 hours a rain event
- Sampled for exceedances of:
 - Chlorine (0.4 ppm)
 - Phenols (0.17 ppm)
 - Copper (0.21 ppm)
 - Detergents (0.5 ppm)
 - Ammonia (1.0 ppm)
- Retested, if necessary, 4 to 24 hours after

Hotspot Inspections

120 commercial and industrial businesses inspected over the course of the 5-year permit term

- Prioritized based on their North American Industry Classification System (NAICS) code
- Assessed based on their pollution prevention practices related to:
 - Vehicle Maintenance and Repair Operations
 - Outdoor Storage
 - and Waste Management
- Qualified as:
 - Not Hotspots
 - Hotspots but No Violations
 - Hotspots with Violations



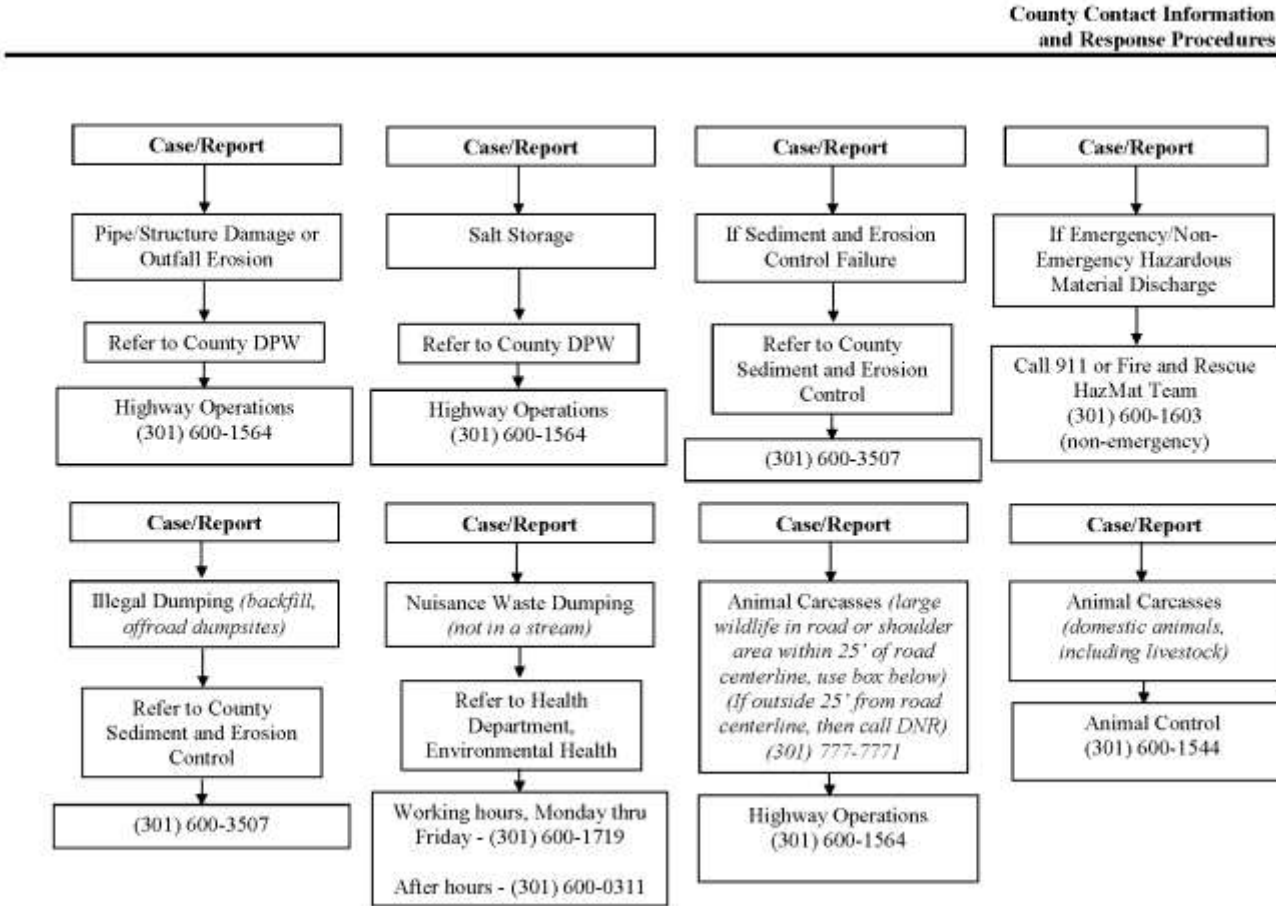


Citizen Case Reports

- Received 3 ways:
 - By phone
 - By email
 - Through our online [RequestTracker](#)
- Assessed for:
 - Validity, and/or
 - Jurisdictional Boundary
- Documented on:
 - Follow Up and Remediation Actions
 - Interagency collaborations



Response and Documentation Flow Chart



2-3

Spill Response Contract

A intracountry contract that can support the IDDE program through material identification, containment, and disposal.

1

Frederick County OSER

Receives report of spill within the County Right-of-Way and initiates spill response.

2

Frederick County DPW

Manages spill contractor and procurement process for timely and appropriate clean up.

3

Kalyani Environmental Solutions, LLC

Directs and oversees the cleanup efforts on site.



Chapter 1-15.2: Stormwater Management

Article XII: Discharges to Storm Sewers



Definitions

Adds definitions for:

- Illicit Connection
- Illicit Discharge
- Municipal Separate Storm Sewer System
- National Pollutant Discharge Elimination System (NPDES) Permit
- Pollutant
- Prohibited material



Prohibited Activities

Activities delineated in this section are:

- Sources that the County is required to investigate and eliminate;
- Consistent with the County's MS4 Permit and EPA's Code of Federal Regulations related to the NPDES permit program.



Right of Entry and Inspection

Permits the manager to:

- Enter the property in the event of owner's consent, court order, or a public health threat;
- Use inspection methods to identify the source and verify its elimination;
- Make emergency repairs and recover costs if necessary.



Prevention and Control

Establishes:


- Requirements and responsibility of the property owner;
- Authority of the manager to direct steps for remediation;
- Ability to make the required cleanup measures and recover costs.



Enforcement and Penalties

Applies §1-1-9 to:

- Deem the first offense as a civil offense;
- Escalate any offense thereafter;
- Seek legal remedies as appropriate.



General Permit for Stormwater Discharges Associated with Industrial Activity

“authorizes the discharge of stormwater associated with industrial activity to waters of the State.”

Includes inspection, monitoring, maintenance, training, and proper housekeeping requirements.



The takeaways

- Frederick County is actively doing their part to find and eliminate sources of pollution.
- Our IDDE Program is ever changing.
- There is no one solution to every discharge found.

Thank You



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