

TENNESSEE STATE UNIVERSITY

Facilities Management

Subject: Illicit Discharge Detection and Elimination Policy

Reference: Tennessee Water Quality Control Act of 1977, Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977 and the Water Quality Act of 1987.

Implementation Date:

Review Date: Annually

Introduction

As instructed by the Tennessee Department of Environment and Conservation Division of Water Pollution Control's Phase II Stormwater Permit Notice of Coverage, Tennessee State University is responsible for screening, tracking, and developing policies and procedures addressing illicit discharge detection and elimination as a Phase II Municipal Separate Storm Sewer System (MS4).

The purpose of this policy will be as follows:

- To improve the quality of surface water within the watershed areas owned and maintained by TSU by preventing illicit discharges and connections.
- To prevent the discharge of contaminated stormwater runoff from TSU properties and operations into the stormwater drainage system and from there to the natural waters adjoining the TSU campus.
- To comply with the requirements of TSU's stormwater permit requirements as set forth by Tennessee Department of Environment and Conservation and the United States Environmental Protection Agency.

Definitions

An **illicit discharge** is the unauthorized discharge of pollutants or non-stormwater materials to the storm drainage system via overland or direct dumping of materials into a catch basin or inlet. Illicit discharges are generally any discharge into a storm drain system that is not composed entirely of stormwater.

Illicit discharges are a problem because unlike wastewater which flows to a wastewater treatment plant, stormwater generally flows to waterways without any additional treatment. Illicit discharges often include pathogens, nutrients, surfactants and various toxic pollutants that can negatively impact receiving waters.

Examples of illicit discharges are:

- Illegal connections to storm drainage system
- Dumping mop water and waste floor wax directly into the stormwater drainage system
- Cleaning paint brushes in or around a catch basin
- Pouring waste oil from do it yourself oil changes directly into a catch basin
- Animal Waste

An **illicit connection** is the discharge of pollutants or non-stormwater materials into the storm drainage system via a pipe or other direct connection. Sources of illicit connections may include:

- Sanitary sewer taps
- Wash water from laundry facilities
- Wash water from sinks

Signs of Illicit Discharges

- Water flowing during dry weather
- Oil and grease sheen
- Foaming discharges
- Staining on pipe inner walls or inside drainage ditches
- Heavy slime growth on water surfaces
- Heavy sediment build-up
- Unusual odors
- Distressed vegetation
- Unknown pipes that discharge into storm water

Prohibited discharges include but are not limited to: oil, anti-freeze, chemicals, wash water, paint, animal waste and garbage. Such illicit discharges harm the quality of our waters by killing fish and aquatic life and by making waters unsafe for drinking, swimming or recreation.

No University employee, student, visitor, contractor, department, or unit shall cause or allow discharges into the TSU stormwater drainage system which are not composed entirely of stormwater, except for the allowed discharges listed below.

Allowed Discharges

The following discharges to the storm drainage system are allowed:

- A. Discharges that are specifically permitted under a State or Federal Stormwater program
- B. Uncontaminated discharges from the following sources are permitted:
 - Water line flushing
 - Landscape irrigation
 - Diverted stream flows (permitted)
 - Rising ground water
 - Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(20))
 - Uncontaminated pumped groundwater
 - Discharges from portable water sources
 - Foundation drains, air conditioning condensation
 - Irrigation water
 - Springs
 - Water from crawl space pumps
 - Footing drains
 - Lawn watering
 - Individual, residential car washing
 - Flows from riparian habitats and wetlands
 - Dechlorinated swimming pool discharges
 - Street wash waters
 - Discharges resulting from fire fighting activities

How to Report an Illicit Discharge

If you suspect an illicit discharge or observe improper disposal practices, notify the TSU Environmental Health and Safety Office at 615-963-2148 or 615-963-5683 during normal business hours. Facilities Management Work Control can also be notified during normal business hours at 615-963-5668. For after hours notification, contact on duty personnel at the Alexander Murray Power Plant at 615-963-5970.

For More Information

For more information regarding Illicit Discharge Detection and Elimination, contact Tommi Smith, Assistant Director, Environmental Health and Safety, 615-963-5683. Information may also be found on the TSU Environmental Health and Safety website <http://www.tnstate.edu/environmentalsafety/>.