

# Overview of Performing DWFS and Source Tracking Inspections

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Green Country Stormwater Alliance

Nienhuis Park Community Center

Broken Arrow

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# Purpose of DWFS Program

- Your DWFS program is your process of inspecting your stormwater drainage areas to locate and identify harmful and illegal discharges to your municipal stormwater collection system.
- OKRO<sub>4</sub> requires each permittee to have a DWFS program to identify non-stormwater flows.

# Purpose of Source Tracking

- Your method of determining where the illicit discharges you have identified during DWFS are coming from and who the responsible party or parties are.
- OKRO<sub>4</sub> requires each permittee to conduct source tracking after identifying illegal discharges.

# OKRO<sub>4</sub> Requirements

## IV.C.3 Illicit Discharge Detection and Elimination

- You must review and revise your existing illicit discharge detection and elimination program as necessary.
- You must implement and enforce the program to detect and eliminate illicit discharges into your small MS<sub>4</sub>, including a dry weather field screening program to identify non-stormwater flows.

# OKRO<sub>4</sub> Requirements

## IV.C.3 Illicit Discharge Detection and Elimination

- a(1) If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your illicit discharge detection and elimination program.

# OKRO<sub>4</sub> Requirements

## IV.C.3 Illicit Discharge Detection and Elimination

- a(2) Rely on visual indicators and simple field test kits for most work where you are looking for indications of a problem.
- A(2) Laboratory methods can be reserved for situations where you have identified a problem and may need to take enforcement actions against a suspected illicit discharger.

# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(2)(a) Procedures for locating priority areas within your MS<sub>4</sub> likely to have illicit discharges such as areas with older sanitary sewer lines, industrial areas, 303(d) streams, etc.
- a(2)(b) Procedures to address on-site sewage disposal systems that may flow into your storm drainage system.

# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(2)(c) Procedures for tracing the source of an illicit discharge, including the specific techniques you will use to detect the location of the source.
- a(2)(d) Procedures for removing the source of the illicit discharge.
- a(2)(e) Procedures for illicit discharge detection and elimination program evaluation and assessment.



# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(3) Develop, maintain and regularly update a storm sewer system map, showing the location of all outfalls and the names and locations of all waters of the State that receive discharges from those outfalls.

# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(4) To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanisms, non-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions.
- a(4) If you lack legal authority for enforcement actions, you must include procedures to notify DEQ and then rely on them for enforcement actions.

# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(5) Develop and implement a plan to detect and address non-stormwater discharges.
- a(6) Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.
- a(7) Maintain a list of occasional incidental non-stormwater discharges or flows as allowed in Part I – B2 that will not be addressed as illicit discharges.

# OKRO<sub>4</sub> Requirements

## Minimum Requirements

- a(8) Establish or revise (as necessary) measurable goals for each BMP, including target milestones (month and year), frequency of actions and identify responsible persons.
- a(9) Evaluate the appropriateness of your identified BMPs for this minimum control measure. Document the evaluation of your illicit discharge detection and elimination program annually.

# OKRO<sub>4</sub> Requirements

## Recommendations

- Develop and implement a written spill response and prevention plan to ensure appropriate actions will take place when a spill occurs within your MS<sub>4</sub>.



# Questions?

**“When we try to pick out anything by itself, we find it hitched to everything else in the Universe.” - John Muir**