



WILLIAM & MARY

CHARTERED 1693

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DIRECTIVE 762

TITLE: Illicit Discharge Detection

EFFECTIVE DATE: January 29, 2016

REVISION OF: First version

I. SCOPE:

This directive applies to the all members of the Facilities Management Department.

II. PURPOSE:

The purpose of this procedure is to identify and address any illicit discharges detected during storm sewer outfall inspections or otherwise reported illicit discharges impacting the storm sewer system.

III. POLICY:

Background:

The College of William & Mary (W&M) has a permit to operate a Municipal Separate Storm Sewer System (MS4) issued by the Virginia Department of Environmental Quality. This permit authorizes W&M to discharge stormwater pursuant to the Virginia Stormwater Management Program and the Virginia Stormwater Management Act.

Since storm drain systems are not connected to a sanitary sewer treatment plant, water traveling through the storm drain system flows directly to local streams, rivers and lakes untreated. An illicit discharge to the storm system is generally defined as any discharge that is not composed entirely of stormwater. W&M's MS4 Program "shall include all procedures developed by the operator to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping to the MS4."

Responsibilities:

1. Facilities Management Grounds staff
 - a. Responsible for reporting any illicit discharges discovered during outfall inspections to the Associate Director of Utilities or appropriate Facilities Management leadership if the Associate Director is unavailable.

2. Associate Director of Utilities
 - a. Maintains the Illicit Discharge Log
 - b. Provides annual training to FM staff.
 - c. Provides annual review and update, as appropriate, of this FM Directive 762.

3. Director, Environmental Health & Safety
 - a. Responsible for reporting the illicit discharge to the appropriate regulatory agencies as required.
 - b. Provides technical assistance to emergency responders for hazardous materials spills.
 - c. Prepares the annual Illicit Discharge Summary report and posts it to the FM MS4 web page.

4. Facilities Management Directors
 - a. All FM directors are responsible for ensuring that employees are properly informed of and trained on how to prevent illicit discharges from their operations and understand how to trace an illicit discharge upon discovery.
 - b. Managers and supervisors are responsible for ensuring training is conducted with the most recent version of this FM Directive 762.

5. Personnel Performing the Job
 - a. Facilities Management Operations & Maintenance and Grounds staff are required to understand and follow these procedures upon receipt of proper training.

Procedures:

1. Initial Notification
 - a. The Associate Director (AD) of Utilities will be notified of any illicit discharge detected during a storm sewer outfall inspection or otherwise identified. A complete description of the discharge and as much information as possible will be provided.
 - Any time the AD of Utilities or other FM staff are notified of an illicit discharge, the Director, EH&S shall also be notified of the illicit discharge. EH&S staff shall immediately follow up on the illicit discharge report.
 - b. When the contaminant is discovered, the Associate Director of Utilities will enter information about the incident in the Illicit Discharge Investigation log. The log will describe the nature of the contamination and all response and follow-up measures taken to clean it up.

2. Discharge Identified – Primary Option
 - a. If the contaminant is identified as a sanitary sewer overflow, Utilities staff will install emergency containment such as sandbags or other means. An emergency contractor will then be called to clean the spill using a vacuum truck or other appropriate means.
 - b. Petroleum spills are to be cleaned up in accordance with the University's Spill

