Illicit Discharge Detection and Elimination (IDDE) Plan

City of Huntington, IN

Permit # IN040011

April 2015

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I. Introduction

The City of Huntington's Municipal Separate Storm Sewer System (MS4) program has developed the following Illicit Discharge Detection and Elimination (IDDE) Plan to detect and eliminate illicit connections and illegal discharges to the MS4 conveyance system in accordance with the City's Stormwater Quality Management Plan (SWQMP) and the City's IDDE Ordinance as required by 327 IAC 15-13 (Rule 13). Through the promulgation of the IDDE Ordinance, in Chapter 56 of Huntington's Code of Ordinances, the City prohibits illicit connections and illegal discharges into MS4 conveyances and establishes appropriate enforcement procedures. The purpose of this plan is to outline the program for identification and elimination of illicit connections and illegal discharges in the MS4 conveyance system.

Rule 13 defines an "Illicit Discharge" as any discharge to an MS4 conveyance that is not composed entirely of stormwater, except naturally occurring floatables, such as leaves or tree limbs. Chapter 56, Illicit Stormwater Discharges and Connections, defines an "Illegal Discharge" as "any direct or indirect non-stormwater discharge to the storm drain system, except as exempted in § 56.09 (A)(1) of this chapter." For the purpose of this program, illicit discharge shall mean the same as "Illegal Discharge".

Rule 13 requires that an MS4 Community develop a plan to detect, address, and eliminate illicit discharges, including illegal dumping, into the MS4 conveyance. Through promulgation of the IDDE Ordinance, in Chapter 56 of Huntington's Code of Ordinances, the city prohibits illegal discharges into MS4 conveyances: § 56.08 DISCHARGE PROHIBITIONS (A)(1) states that "No person shall discharge, or cause to be discharged, into the municipal storm drain system or watercourses any materials, including but not limited to, pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater." Chapter 56, Illicit Stormwater Discharges and Connections, defines a "Pollutant" as "something that causes or contributes to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; non-hazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous substances and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing or building a structure; sediments and noxious or offensive matter of any kind." In § 56.11 MONITORING OF DISCHARGES, the ordinance establishes legal authority for the city to inspect properties suspected of releasing contaminated discharges into the sewer system.

The IDDE Plan does not address the following categories (Table I-1) of non-stormwater discharges or flows per § 56.08 DISCHARGE PROHIBITIONS (A)(2)(a) of the ordinance. These discharges are exempted from regulation in the ordinance.

Table I-1 Exempted Non Stormwater Discharges

potable water line flushing	other potable water sources
landscape irrigation	lawn watering
diverted stream flows	rising groundwater
groundwater infiltration to storm drains	uncontaminated pumped groundwater
foundation or footing drains (not including active groundwater dewatering systems)	water from crawlspace pumps
air conditioning condensation	springs
non-commercial washing of vehicles	natural riparian habitat or wetland flows
swimming pools (<1 PPM chlorine)	fire-fighting activities
any water source w/o pollutants	

Discharges can be classified based on discharge frequency (continuous, intermittent, or transitory), flow type (sewage/septic, wash water, liquid waste, tap water, landscape irrigation, groundwater, or spring water) and how they enter the storm drain system. The mode of entry can be direct or indirect. Direct entry means that the discharge is directly connected pipe to pipe. Generally direct discharges produce continuous or intermittent discharges. Indirect entry means that flows generated outside the storm drain system enter through storm drain inlets or by infiltrating through the joints of the pipe. Generally, indirect discharges produce intermittent or transitory discharges. Potential sources of indirect discharges are given in Table I-2.

Table I-2 Land Uses, Generating Sites and Activities That Produce Indirect Discharges

Land Use	Generating Site	Activity that Produces Discharge
Residential	• Apartments • Multi-family • Single Family Detached	• Car Washing • Driveway Cleaning • Dumping/Spills (e.g., leaf litter and RV/boat holding tank effluent) • Equipment Washdowns • Lawn/Landscape Watering • Septic System Maintenance and Failures • Swimming Pool Discharges • Pet Wastes • Improper Pesticide/Fertilizer Use
Commercial	• Campgrounds/RV parks • Car Dealers/Rental Car Companies • Car Washes • Commercial Laundry/Dry Cleaning • Gas Stations/Auto Repair Shops • Marinas • Nurseries and Garden Centers • Oil Change Shops • Restaurants • Swimming Pools	• Building Maintenance (power washing) • Dumping/Spills • Landscaping/Grounds Care (irrigation) • Outdoor Fluid Storage • Parking Lot Maintenance (power washing) • Vehicle Fueling • Vehicle Maintenance/Repair • Vehicle Washing • Washdown of greasy equipment and grease traps • Improper Pesticide/Fertilizer Use & Storage
Industrial	• Auto recyclers • Beverages and brewing • Construction vehicle washouts • Distribution centers • Food processing • Garbage truck washouts • Marinas, boat building and repair • Metal plating operations • Paper and wood products • Petroleum storage and refining • Printing	• All commercial activities • Industrial process water or rinse water • Loading and un-loading area washdowns • Outdoor material storage (fluids) • Spills/Dumping (Raw materials & products)
Institutional	• Cemeteries • Churches • Corporate Campuses • Hospitals • Schools and Universities	• Building Maintenance (e.g., power washing) • Dumping/Spills • Landscaping/Grounds Care (irrigation) • Parking Lot Maintenance (power washing) • Vehicle Washing • Improper Fertilizer/Pesticide Storage and Use

Land Use	Generating Site	Activity that Produces Discharge
Municipal	• Airports • Landfills • Maintenance Depots • Municipal Fleet Storage Areas • Ports • Public Works Yards • Streets and Highways	• Building Maintenance (power washing) • Dumping/Spills • Improper Pesticide/Fertilizer Storage and Use • Outdoor Fluid/Materials Storage • Landscaping/Grounds Care (irrigation) • Parking Lot Maintenance (power washing) • Road Maintenance • Spill Prevention/Response • Vehicle Fueling • Vehicle Maintenance/Repair • Vehicle Washing • De-icing Operations

II. Outfall Screening

§ 56.07 of Chapter 56 Illicit Stormwater Discharge and Connections defines "Storm Drainage System" as "publicly-owned facilities by which stormwater is collected and/or conveyed, including but not limited to, any roads with drainage systems, municipal streets, gutters, curbs, inlets, piped storm drains, pumping facilities, retention and detention basins, natural and human-made or altered drainage channels, reservoirs, and other drainage structures. When the city decided it wanted a Geographic Information System (GIS), it hired a contractor to develop the GIS and acquire all the necessary data including sanitary and storm sewer locations." Part of the data collected was the location of each end-of-pipe in the city. Upon completion of the GIS project, Huntington reviewed the stormwater collection system details and determined there are 57 outfalls in the MS4 Area. The original numbering of the end-of-pipe for each stormwater outfall was retained for congruency between the layers in Huntington's GIS.

As a part of this research, Huntington was able to determine that the 57 outfalls discharged to 3 main receiving streams – Clear Creek, the Little River and the Wabash River. The receiving streams, watersheds and the associated 12-digit HUC can be seen in Figure II-1. As can be seen from the Figure, Huntington's stormwater has a major impact on the Flint Creek-Little River watershed. The continued assessment of impacts will be important to be certain the MS4 program is having the desired effects. A listing of all MS4 outfalls is included in Table II-1. The table includes information on the type of outfall and the receiving stream. A graphic depiction of all MS4 outfall locations is included in Figure II-2.

Based on the Total Maximum Daily Load (TMDL) for *Escherichia coli (E. coli)* and Impaired Biotic Communities (IBC) in the Wabash River Watershed in Huntington County prepared by Tetra Tech for the Illinois Environmental Protection Agency and the Indiana Department of Environmental Management, and published on September 18, 2006; the segment of the Wabash River within the City of Huntington MS4 Area is identified as impaired and listed on the 303(d) water quality list. This segment is listed as impaired for both *E. coli* and IBC. Figure II-3 shows the 303(d) listed portion of the Wabash River with a red line.

As required by Rule 13, the city will detect illicit discharges via dry weather screening, investigate the source, take the appropriate actions to ensure elimination of illicit discharges detected, and document corrective actions taken. Dry weather screening consists of visual observations during dry weather when the presence of flow in a storm sewer, outfall or other conveyance is not expected to occur. The city defines dry weather as a period in which there has been no rainfall or no more than one-tenth (0.1) of an inch of rain within a seventy-two (72) hour period. The City of Huntington MS4 Coordinator and GIS Technician perform the dry weather screening under the direction of the City Engineer. Staff review Part C of the SWQMP and the city's inspection form prior to performing screening

Huntington will annually perform its dry weather screening. All outfalls will be screened and all data will be collected and stored for use as needed. The general information that will be collected includes: Outfall number, Receiving Water, Last Rainfall > 0.10", date, time and temperature. The physical observations collected are: flow rate, discharge color, turbidity, floatables, deposits/stains, odors, vegetation conditions and damage to Outfall Structure.

As a part of its dry weather screening program, Huntington will perform sampling of the discharge. The parameters that are measured include: temperature, pH, Total Chlorine, Total Copper, Detergents and Phenols. The inspector takes a photo of the Outfall and may provide comments. The Outfall Screening Form is included as Figure II-4. Completed Outfall Screening Forms for outfalls 191 and 202 are included in Appendix A as examples. Illicit discharges can be discovered by means other than outfall screening. Discovery can be either the result of a complaint received by the MS4 program or the result of observation during other MS4 program work within the city. When an illicit discharge is determined in this manner an Illicit Discharge Form is completed and MS4 program staff work to permanently stop the discharge. The Illicit Discharge Form is included as Figure II-5.

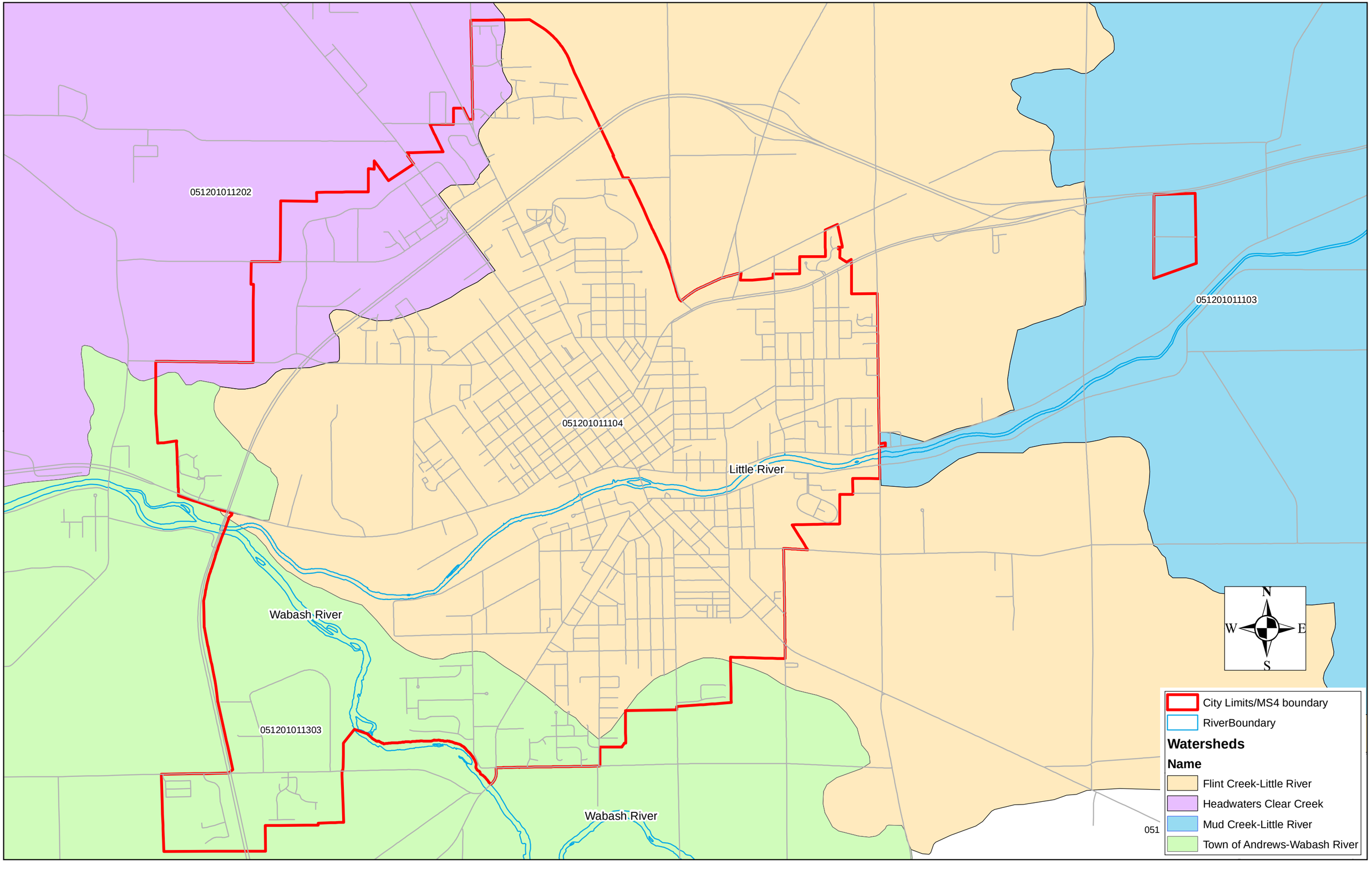
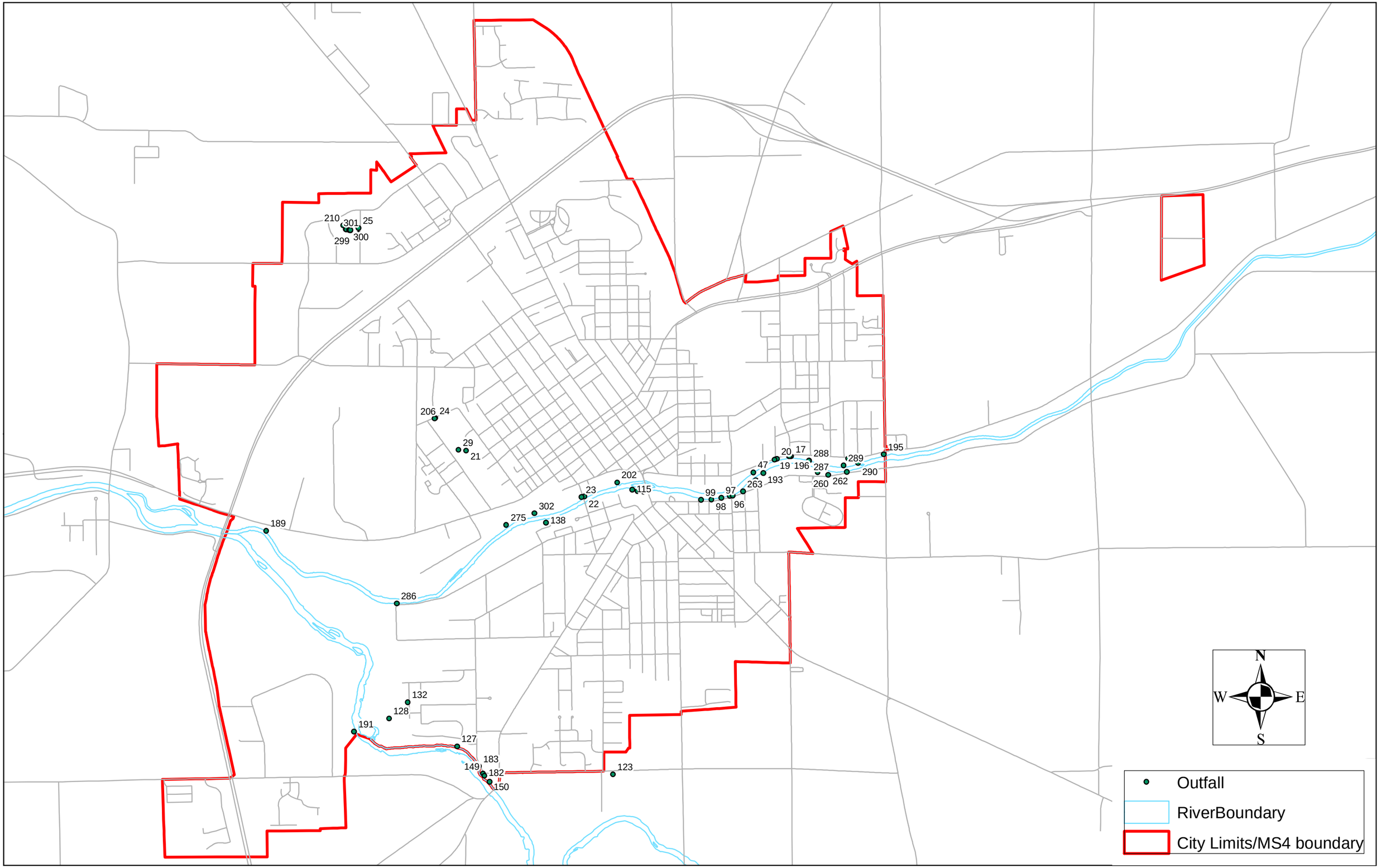

051201011202
051201011104
051201011103
Little River
Wabash River
051201011303
Wabash River
051
N
W
E
S
City Limits/MS4 boundary
RiverBoundary
Watersheds
Name
Flint Creek-Little River
Headwaters Clear Creek
Mud Creek-Little River
Town of Andrews-Wabash River

Table II-1 MS4 Outfall Construction

Outfall ID	Pipe Dimension	2nd Pipe Dimension	Material	Conveyance Type	Receiving Stream
16	8	-	VCP[1]	Pipe	Little River
17	8	-	PVC[2]	Pipe	Little River
18	24	-	RCP[3]	Pipe	Little River
19	6	-	VCP	Pipe	Little River
20	8	-	VCP	Pipe	Little River
21	48	-	RCP	Pipe	Little River
22	12	-	CSP[4]	Pipe	Little River
23	12	-	CSP	Pipe	Little River
24	36	36	PCC[5]	Pipe	Little River
25	60	-	CSP	Pipe	Clear Creek
29	15	-	PVC	Pipe	Little River
47	30	-	RCP	Pipe	Little River
96	21	-	CSP	Pipe	Little River
97	10	-	PVC	Pipe	Little River
98	12	-	PVC	Pipe	Little River
99	15	-	PVC	Pipe	Little River
113	24	-	RCP	Pipe	Little River
114	24	-	RCP	Pipe	Little River
115	24	-	RCP	Pipe	Little River
123	24	-	RCP	Pipe	Wabash River
127	18	-	RCP	Pipe	Wabash River
128	36	-	HDPE[6]	Pipe	Wabash River
132	36	-	CSP	Pipe	Wabash River
138	15	-	PVC	Pipe	Little River
149	8	-	PVC	Pipe	Wabash River
150	8	-	PVC	Pipe	Wabash River
182	8	-	CSP	Pipe	Wabash River
183	8	-	CSP	Pipe	Wabash River
187	46	36	PCC	Pipe	Little River
290	12		RCP	Pipe	Little River
294	18		HDPE	Pipe	Clear Creek
189				Open Ditch	Wabash River
191	36		CSP	Pipes (3)	Wabash River
193				Open Ditch	Little River
195	15		RCP	Pipe	Little River
196	72		RCP	Pipe	Little River
197	12		VCP	Pipe	Little River
198	18		RCP	Pipe	Little River

Outfall ID	Pipe Dimension	2nd Pipe Dimension	Material	Conveyance Type	Receiving Stream
199	12		CPC[7]	Pipe	Little River
202	72	156	CPC	Pipe	Little River
206	60	84	CSP	Pipe	Little River
209	15			Open Ditch	Clear Creek
210	36		HDPE	Pipe	Clear Creek
260	24		CSP	Pipe	Little River
261	12		CSP	Pipe	Little River
262	15		CSP	Pipe	Little River
263	12		CSP	Pipe	Little River
275	48		CSP	Pipe	Little River
277	24		HDPE	Pipe	Clear Creek
286				Open Ditch	Little River
287	8		PVC	Pipe	Little River
288	12		PVC	Pipe	Little River
289	12		PVC	Pipe	Little River
298	6		PVC	Pipe	Clear Creek
299	18		HDPE	Pipe	Clear Creek
300	10		HDPE	Pipe	Clear Creek
301	12		PVC	Pipe	Clear Creek

1. VCP = Vitrified Clay Pipe
2. Polyvinyl Chloride Pipe
3. RCP = Reinforced Concrete Pipe
4. Corrugated Steel Pipe
5. Precast Concrete Pipe
6. High Density Polyethylene Pipe
7. Cast-In-Place Concrete Pipe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127
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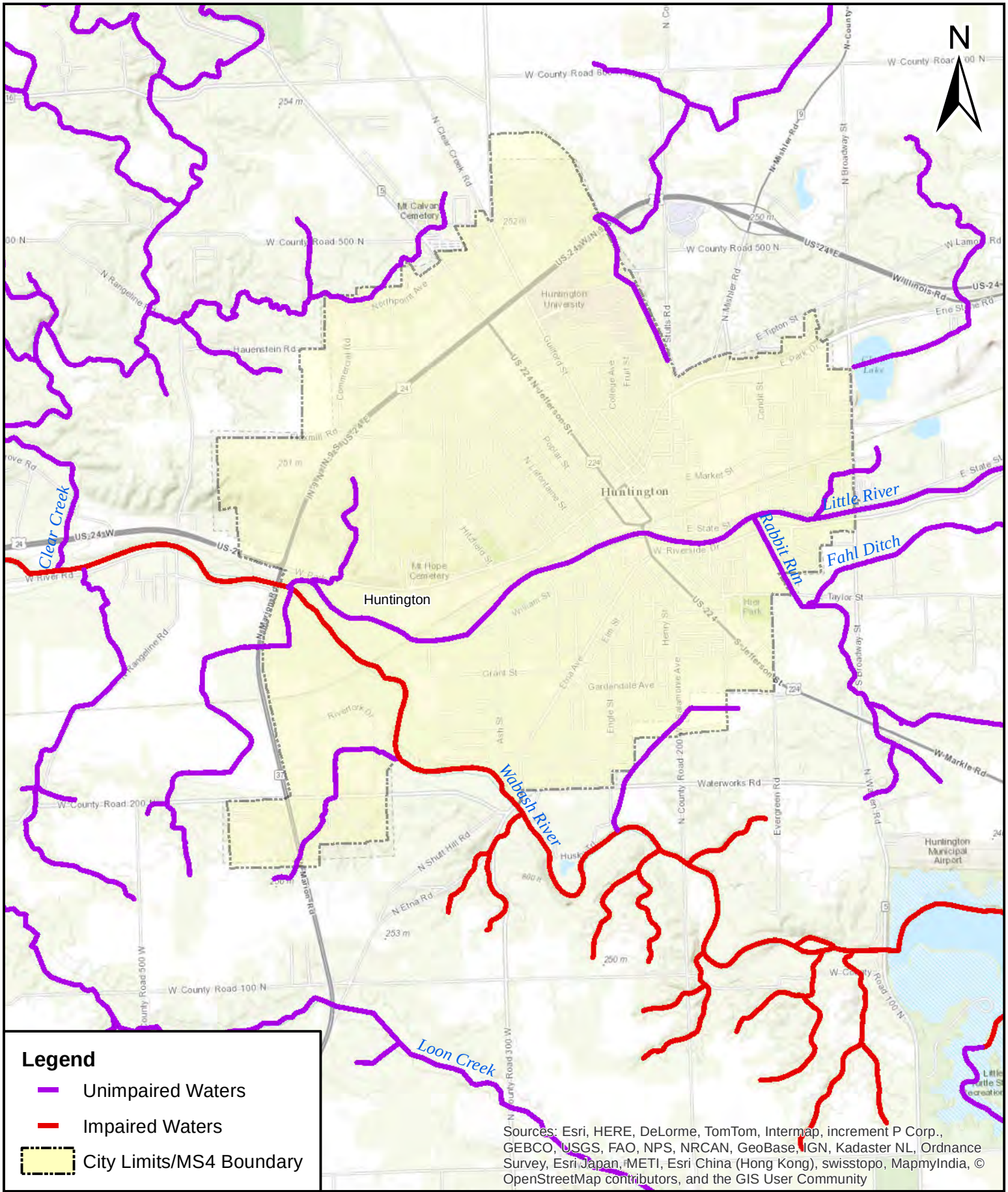
149
182
150
123
N
W
E
S
Outfall
RiverBoundary
City Limits/MS4 boundary



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303d Impaired Waters

0 1,550 3,100 6,200 Feet

Location: Huntington
County: Huntington
Township:
State: Indiana
Date: 02/04/2015

Illicit Discharge Detection Elimination

Outfall Screening Form

GENERAL INFORMATION

Outfall Number: _____ Receiving Water: _____ Last Rainfall > 0.10 " _____

Date: _____ Time: _____ Air Temperature: _____

Inspector: _____

PHYSICAL OBSERVATIONS

Flow Rate: ☐ None ☐ Trickle ☐ 1/4 Flow ☐ 1/2 Flow ☐ 3/4 Flow ☐ Full

Discharge Color: ☐ None ☐ Yellow ☐ Brown ☐ Green ☐ Red ☐ Gray ☐ Other

Trubidity: ☐ None ☐ Cloudy

Floatables: ☐ None ☐ Petroleum Sheen ☐ Sewage ☐ Other: _____

Deposits/Stains: ☐ None ☐ Sediment ☐ Oily ☐ Other: _____

Vegetation Conditions: ☐ Normal ☐ Excessive Growth ☐ Inhibited Growth

Damage to Outfall Structure: ☐ None ☐ Cracking ☐ Spalling ☐ Peeling Paint ☐ Metal Corrosion ☐ Other: _____

PHYSICAL OBSERVATIONS

Parameter	Tested	Results	Equipment Used
Temperature			
pH			
Total Chlorine			
Total Copper			
Detergents			
Phenols			

COMMENTS:

_____

_____

_____

_____

Illicit Discharge Detection Elimination

Illicit Discharge

GENERAL INFORMATION

Location: _____ Receiving Structure: _____

Date: _____ Time: _____ Type of Discharge: _____

Inspector: _____

PHYSICAL OBSERVATIONS

Flow Rate: ☐ None ☐ Trickle ☐ 1/4 Flow ☐ 1/2 Flow ☐ 3/4 Flow ☐ Full

Discharge Color: ☐ None ☐ Yellow ☐ Brown ☐ Green ☐ Red ☐ Gray ☐ Other

Trubidity: ☐ None ☐ Cloudy

Floatables: ☐ None ☐ Petroleum Sheen ☐ Sewage ☐ Other: _____

Deposits/Stains: ☐ None ☐ Sediment ☐ Oily ☐ Other: _____

PHYSICAL TESTS

Parameter	Tested	Results	Equipment Used
Temperature			
pH			
Total Chlorine			
Total Copper			
Detergents			
Phenols			

COMMENTS & CORRECTIVE ACTIONS:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

III. Source Identification

The city will attempt to identify the source of all documented illicit discharges into the MS4 conveyance system. Since dry weather discharges may be intermittent or transitory the city may not be able to identify the source of all illicit discharges during the screening period. As a process of evaluating their program, the city will determine if certain outfalls should be screened more often for transitory or intermittent discharges based on the physical indicators noted at each outfall during the screening process. Outfalls with a high illicit discharge potential (IDP) may also be screened more often. It is noted that Outfall 191 in Appendix A is the discharge from an industrial area and has a high illicit discharge potential and may be screened more frequently to ensure surface water protection.

Once outfalls with evidence of illicit discharges have been located, various methods can be used to pinpoint the exact source of the discharge and include manhole observation, dye testing, video inspection, smoke testing and tracking of illegal dumping.

The city uses a key tracking technique, which is to follow dry weather flows upstream along the conveyance system to bracket the location of the source. This can be accomplished by taking the following steps:

- Consult the storm sewer conveyance map;
- Check the next "upstream" manhole with a junction to see if there is evidence of discharge and sample the discharge, if deemed necessary,
- Repeat these steps until a junction is found with no evidence of discharge; the discharge source is likely to be located between the junction with no evidence of discharge and the next downstream junction.
- Review NPDES permits for industrial sites in the area to identify/rule out potential sources.
- Note the surrounding land use.
- Field reconnaissance to locate source(s).

This technique was used as part of the dry weather screening of all outfalls in the MS4 Area during 2014. All discharges were screened in November 2014. Only Outfall 202 was discharging at the time of dry weather screening in 2014. In October 2014, the source of the Outfall 202 discharge was researched. Outfall 202 is the discharge of Flint Creek, which was enclosed many years ago. This Outfall had also been a combined sewer overflow discharge; however, the sanitary connections were separated out of the Flint Creek combined sewer in 1973. No Illicit discharges were detected in this or any other portion of the MS4 collection system.

The Huntington inspection process includes: take a picture of the Outfall for comparison purposes over time; trace upstream to look for the source of the discharge water; take a sample of the discharge water; and run all tests on the Outfall Screening Form (Figure II-4), which help in

determining if there is an illicit discharge. Two examples of completed forms are included in Appendix A.

To aid in determining the source of an illicit discharge, Huntington may use dye testing. If a discharge has been narrowed down to a few homes or businesses then the city will dye test one property at a time. This test requires at least 2 people to perform – 1 to place the dye and run water and 1 to observe the receiving sewer for the dye.

The city also has a robotic sewer camera to aid in determining the source of a discharge if needed. Distance and location within a pipe can be determined using a sewer camera. The collected data can be stored on a videocassette or DVD for use in locating and eliminating illicit discharges and connections.

The city has purchased smoke testing equipment to aid in determining the source of illicit discharges. This equipment will be utilized by both the wastewater and stormwater departments. The blower equipment blows non-toxic smoke into the sewer system. It is important to notify building owners of the impending smoke test as smoke can enter into buildings. The police and fire departments should also be informed of the testing so it can be explained to anyone missed in the initial notification. Smoke testing a storm sewer would allow us to visually see what is connected to the storm sewer. This would allow us to see if someone has a sanitary sewer connected illegally to a storm sewer. The use of smoking equipment for illicit discharge detection is most effective when the property has an external clean out. Smoke will exit the external cleanout of a property when smoke testing the storm sewer if an illicit discharge connection is present. Otherwise, smoke will typically only exit the sanitary system in the case of leaky service connections and dry taps. Also any location that smoke can escape the storm sewer line being tested is a location where water can get in and could be the location of the suspected illicit discharge.

Huntington does not have a database for tracking MS4 information at this time. The city's GIS system has a date and photo of the last inspection. Illicit discharge information can be added to the GIS system, which would allow Huntington to track these discharges. The locations could be visited periodically to verify that the illicit discharge has been stopped. Electronic and hard copies of the completed inspection forms are retained for future reference.

IV. Active Industries in MS4 Area

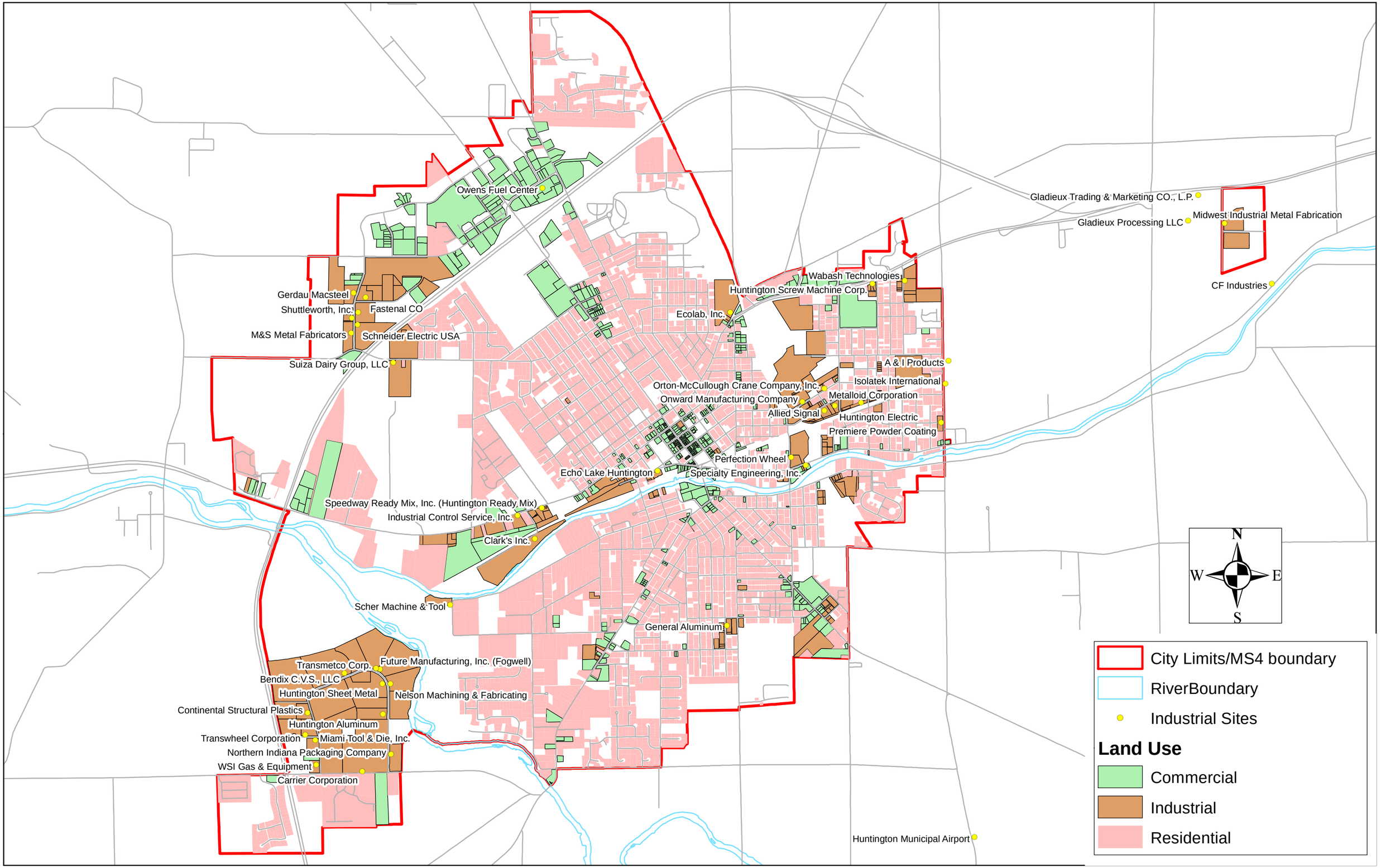
The industrial facilities within Huntington are listed in Table IV-1 below. The industrial facilities regulated by IDEM under 327 IAC 15-6 (Rule 6) are marked with an *. All active industrial facilities located within the city MS4 Area considered potential pollutant sources have been identified and updated in the city's GIS to ensure the list is accurate and current. A Map depicting all active industrial facilities and land use is included as Figure IV-1.

Table IV-1 Industrial Facilities within the Huntington MS4 Area (= Rule 6 Facility)*

Facility Name (Permit Number)	Facility Address	City	Zip	Phone Number	SIC Code(s)
A & I Products	855 N Broadway Street	Huntington	46750	(260) 358-9254	3544
Allied Signal	1155 E Franklin Street	Huntington	46750	(260) 358-0768	3537
Bendix C.V.S., LLC* (INR110340)	1850 Riverfork Drive	Huntington	46750	(260) 356-9720	3714; 4225
Carrier Corporation	3650 W 200 N	Huntington	46750	(260) 358-0888	3672
CF Industries	574 E. Hosler Road	Huntington	46750	(260) 356-6008	4221
Clark's Inc.* (INR600093)	100 Hitzfield Street	Huntington	46750	(260) 356-8314	5093
Continental Structural Plastics* (INR00017)	1890 Riverfork Drive	Huntington	46750	(260) 355-4050	3089
Ecolab, Inc.* (INR230098)	970 East Tipton Street	Huntington	46750	(260) 356-7804	2842
Fastenal CO	20 Commerce Drive	Huntington	46750	(260) 358-1879	5085
Future Manufacturing, Inc. (Fogwell)	1700 Riverfork Drive East	Huntington	46750	(260) 454-0222	3999
General Aluminum	1345 Henry Street	Huntington	46750	(260) 356-3900	3365

Facility Name (Permit Number)	Facility Address	City	Zip	Phone Number	SIC Code(s)
Gerdau Macsteel	25 Commercial Road	Huntington	46750	(260) 356-9520	3433
Gladieux Processing LLC* (INR000008)	4761 N U.S. Hwy 24 East	Huntington	46750	(260) 423-4477	5171
Gladieux Trading & Marketing CO., L.P.* (INR700010)	4757 N U.S. Hwy 24 East	Huntington	46750	(260) 423-4477	5171
Good Humor - Breyers	435 West State Street	Huntington	46750	(260) 359-0651	2024
Guhl Machine Co., Inc	700 East Market Street	Huntington	46750	(260) 356-3628	3544
Huntington Aluminum	1605 Riverfork Drive East	Huntington	46750	(260) 504-2770	5093
Huntington Electric	550 Condit Street	Huntington	46750	(260) 356-0756	3625
Huntington Municipal Airport* (INR00H059)	1365 Warren Road	Huntington	46750	(260) 356-8515	4581
Huntington Screw Machine Corp.	2054 Old US 24 East	Huntington	46750	(260) 359-9237	3599
Huntington Sheet Metal	1675 Riverfork Drive East	Huntington	46750	(260) 356-9011	3441
Huntington Tool & Die, Inc.	9 Commercial Road	Huntington	46750	(260) 356-5940	3544
Industrial Control Service, Inc.	1321 West Park Drive	Huntington	46750	(260) 356-4698	3599
Isolatek International* (INR210009)	701 North Broadway St.	Huntington	46750	(260) 356-2040	3296
Metalloid Corporation	504 Jackson Street	Huntington	46750	(260) 358-4610	2992
Miami Tool & Die, Inc.	2080 Riverfork Drive West	Huntington	46750	(260) 356-5903	3544
Midwest Industrial Metal Fabrication	281 Thurman Poe Way	Huntington	46750	(260) 356-5262	3399
M&S Metal Fabricators	5 Commercial Road	Huntington	46750	(260) 356-0300	3444

Facility Name (Permit Number)	Facility Address	City	Zip	Phone Number	SIC Code(s)
Nelson Machining & Fabricating	1640 Riverfork Drive	Huntington	46750	(260) 356-1610	3599
Northern Indiana Packaging Company	1200 Riverfork Drive East	Huntington	46750	(260) 356-9660	2653
Onward Manufacturing Company* (INR110458)	1000 E. Market Street	Huntington	46750	(260) 358-4111	5021
Orton-McCullough Crane Company, Inc.	1244 E. Market Street	Huntington	46750	(260) 356-7902	1796
Owens Fuel Center	2718 Guilford Street	Huntington	46750	(260) 358-1211	2869
Perfection Wheel	255 North Briant Street	Huntington	46750	(260) 358-9239	5531
Premiere Powder Coating	390 N Broadway Street	Huntington	46750	(260) 359-2010	5084
Scher Machine & Tool	1910 William Street	Huntington	46750	(260) 356-1515	3599
Schneider Electric USA	6 Commercial Road	Huntington	46750	(260) 356-2060	1731
Shuttleworth, Inc.	10 Commercial Road	Huntington	46750	(260) 356-8500	3535
Specialty Engineering, Inc.	875 E State Street	Huntington	46750	(260) 356-2678	3544
Speedway Ready Mix, Inc. (Huntington Ready Mix)	1217 West Park Drive	Huntington	46750	(260) 356-5600	3273
Suiza Dairy Group, LLC	1019 Flaxmill Road	Huntington	46750	(260) 356-4225	2026
Transmetco Corp.	1750 Riverfork Drive	Huntington	46750	(260) 355-0089	5051
Transwheel Corporation	3000 Yeoman Way	Huntington	46750	(260) 358-8660	3714
Wabash Technologies	1375 Swan Street	Huntington	46750	(260) 355-4100	3625
WSI Gas & Equipment	2010 Riverfork Drive	Huntington	46750	(260) 356-5118	5084


Owens Fuel Center
Gladieux Trading & Marketing CO., L.P.
Gladieux Processing LLC
Midwest Industrial Metal Fabrication
CF Industries
Wabash Technologies
Huntington Screw Machine Corp.
Gerdau Macsteel
Shuttleworth, Inc.
Fastenal CO
Ecolab, Inc.
M&S Metal Fabricators
Schneider Electric USA
Suiza Dairy Group, LLC
A & I Products
Isolatek International
Orton-McCullough Crane Company, Inc.
Onward Manufacturing Company
Metalloid Corporation
Allied Signal
Huntington Electric
Premiere Powder Coating
Perfection Wheel
Specialty Engineering, Inc.
Echo Lake Huntington
Speedway Ready Mix, Inc. (Huntington Ready Mix)
Industrial Control Service, Inc.
Clark's Inc.
Scher Machine & Tool
General Aluminum
Transmetco Corp.
Future Manufacturing, Inc. (Fogwell)
Bendix C.V.S., LLC
Huntington Sheet Metal
Nelson Machining & Fabricating
Continental Structural Plastics
Huntington Aluminum
Transwheel Corporation
Miami Tool & Die, Inc.
Northern Indiana Packaging Company
WSI Gas & Equipment
Carrier Corporation
Huntington Municipal Airport
N
W
E
S
City Limits/MS4 boundary
RiverBoundary
Industrial Sites
Land Use
Commercial
Industrial
Residential

V. Eliminating Illicit Discharges

The goal of the city's IDDE Plan is to eliminate all identified illicit discharges to their stormwater conveyance system. As Huntington works to achieve this goal it will also be eliminating its contributions that are causing the Wabash River to appear on the 303(d) list of impaired waters as shown in Figure II-3. This goal can prove difficult when political and socioeconomic circumstances are involved. The city will attempt to enforce and eliminate all identified illicit discharges in accordance with the IDDE Ordinance in Chapter 56 of Huntington's Code of Ordinances.

When the source of an illicit discharge is determined, the city utilizes its ordinance to enforce the removal of the illicit discharge. The first step will be to inform the property owner, in writing, of the illicit discharge in accordance with § 56.16 of the IDDE Ordinance. If the person fails to correct the problem then a fine can be imposed. This section of the Ordinance is included below.

§ 56.16 ENFORCEMENT.

(A) Notice of violation. Whenever the city finds that a person has violated, or failed to meet a requirement of, this chapter, the city may order compliance by written notice of violation to that person. Such notice may require without limitation:

(1) The performance of monitoring, analysis and reporting;

(2) The elimination of illicit discharges and connections;

(3) That violating discharges, practices or operations shall cease and desist;

(4) The abatement or remediation of stormwater pollution or contamination hazards, and the restoration of any affected property;

(5) Reimbursement of administrative and remediation costs;

(6) The implementation of source control or treatment BMPs; and

(7) Payment of fine.

If abatement of a violation and/or restoration of affected property is required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said notice shall further provide that, should the violator fail to remediate or restore within the established deadline, the work will be done by a designated governmental agency or a contractor, and the expense thereof shall be charged to and recovered from the violator.

(B) Administrative fines.

(1) When the city finds that a person has violated, or continues to violate, any provision of this chapter, the city may impose an administrative fine against such person in an amount not to exceed $2,500 on a per violation, per day basis, plus any administrative or remediation costs.

(2) Issuance of an administrative fine shall not be a bar against, or a prerequisite for, taking any other action against the person or enforcing this chapter.

Property owners are allowed an appeal of the notice of violation. The appeal process is described in the section of the ordinance included below.

§ 56.17 APPEAL OF NOTICE OF VIOLATION.

Any person receiving a notice of violation may appeal the determination of the city which resulted in the notice. The notice of appeal must be received at the Office of the city's Clerk-Treasurer within ten days from the date of the notice of violation. Hearing on the appeal before the city's Board of Public Works and Safety, or its designee, shall take place within 15 days from the date of receipt of the notice of appeal, unless waived by both the city and person appealing. The decision of the city's Board of Public Works and Safety, or its designee, shall be final.

Huntington has a program in place to address the illicit discharge; after an appeal of the notice of violation has been denied. The program includes the city's authority to correct the violation. This program is described in the section of the ordinance included below.

§ 56.18 ENFORCEMENT MEASURES AFTER APPEAL.

If the violation has not been corrected pursuant to the requirements set forth in the notice of violation, or, in the event of an appeal within ten days of the decision of the municipal authority upholding the decision of the city, then representatives of the city shall enter upon the subject's private property, and are authorized to take any and all measures necessary to abate the violation and/or restore the property. It shall be unlawful for any person, owner, agent or person in possession of any premises to refuse to allow the government agency, or its designated contractor, to enter upon the premises for the purposes set forth above. Penalties shall include, but are not necessarily limited to, those found in § 56.24 of this chapter.

The section of the ordinance, found below, describes how the city will acquire the cost of abatement of the illicit discharge violation.

§ 56.19 COST OF ABATEMENT OF THE VIOLATION.

(A) Within 30 days after abatement of the violation, the owner of the property will be notified by mail of the assessment for the cost of abatement, including administrative costs. The property owner may file a written protest objecting to the amount of the assessment within ten days of the postmarked notice. If the amount due is not paid within 60 days of the postmarked date on the notice, or by the expiration of the time in which to file an appeal, the charges shall become a special assessment against the property and shall constitute a lien on the property for the amount of the assessment.

(B) Any person violating any of the provisions of this chapter shall become liable to the city by reason of such violation. The liability shall be paid in not more than 12 equal payments. Interest at the rate established by Indiana law, currently eight percent per annum, shall

be assessed on the balance, beginning on the tenth day following the postmarked date of the notice of assessment.

Huntington has a successful illicit discharge elimination in its history. It successfully eliminated illicit sanitary discharges from Outfall 202. Outfall 202 is the discharge of Flint Creek, which was enclosed many years ago. This Outfall may have been a combined sewer overflow discharge; however, the sanitary connections were separated out of the Flint Creek sewer in 1973. Dry weather screening has found no evidence of illicit sanitary connections to the outfall indicating that the earlier sewer separation was successful. A copy of its most recent dry weather screening is included in Appendix A.

VI. Public Education, Outreach and Involvement

IN 2004, the City of Huntington developed and implemented a survey to gage public awareness of the MS4 program. 6,600 surveys were sent to Huntington utility customers; of that number, 320 surveys were returned. That is a return rate of five percent (5%). A copy of the survey can be viewed at http://www.surveymonkey.com/s/huntingtonMS4. The results from the survey showed that there was limited knowledge and understanding of the city's storm sewer system.

Huntington has developed a webpage within its website to aid in educating the public on MS4 issues. The webpage contains a definition of illicit discharge. It informs visitors to contact the Wastewater Treatment Plant at 260-358-2313 (illicit discharge hotline) to report an illicit discharge or any type of water pollution. The illicit discharge hotline information was published in the newspaper in September 2014. The webpage also contains a description of what an MS4 is and the responsibilities of Huntington as an MS4 community. There are links to additional information from the US EPA and the IDEM. The webpage also contains announcements on illicit discharge awareness. Huntington conducted a public training meeting on illicit discharge detection in an MS4 on September 26, 2014.

The Huntington MS4 program participates in the annual Splash on the Wabash. Splash on the Wabash is a one-day event during the month of July in which people over the age of 10 can float down the Wabash River from the J. Edward Roush Dam to the Forks of the Wabash Historic Park on an inner tube. Along with the city's in-kind donation, the MS4 program provides education on stormwater and the ways people impact it. During the Splash on the Wabash on July 26, 2014, the MS4 program handed out educational materials to the public. Examples of the educational materials are included in Appendix B.

The city's MS4 program is planning to have an annual presence at the Huntington County Fair with the Soil and Water Conservation District. The Huntington MS4 webpage can be viewed at http://www.huntington.in.us/city/department/division.php?fDD=26-310.

The City of Huntington operates its own Landfill and conducts its own recycling program. The following items are recycled by the city: plastic (#1 - #5), glass (brown, clear and green), paper (various types) and metal (aluminum, steel or tin food cans, empty aerosol cans, empty and dry paint cans). Huntington County operates a Hazardous Materials Facility adjacent to the City of Huntington Landfill. Table VI-1 on the next page contains a guide of the hazardous materials accepted at the county facility.

Table VI-1 Hazardous Materials Guide

Electronics:	• **Computers (CPUs), monitors, and printers** • **Televisions, VCRs, and stereos** • **Fax and small copy machines**
Paints:	• Latex or oil based paints
Flammables:	• Gasoline • Used motor oil • Propane cylinders • Aerosol cans • Adhesives • Transmission fluid • Driveway sealer • Paint thinners • Polyurethane
Batteries:	• Automotive batteries • Motorcycle batteries • Cell phone batteries • Alkaline batteries • Rechargeable batteries
Others:	• Pesticides/herbicides • Used antifreeze • Oxidizers • Poisons • Corrosives • Fluorescent bulbs

The implementation of the recycling and hazardous materials collection programs within Huntington help to prevent pollution of stormwater by keeping those materials out of the stormwater system.

VII. City Employee Training

The City of Huntington has 11 municipal (Rule 13) facilities. A listing of all Huntington's Rule 13 facilities can be found in Table VII-1. The MS4 Coordinator has conducted stormwater training at all the municipal facilities except the airport. A future training session at the airport is being planned. These facility trainings include the topics of Pollution Prevention/Good Housekeeping, IDDE and others.

The city conducts quarterly employee meetings. The MS4 program has been added to the quarterly employee meeting agendas. This allows for a 15-minute block of time to educate all city employees at once on a particular stormwater topic. It is planned that 1 quarterly meeting topic per year will be illicit discharge detection and correction. The last training session at a quarterly meeting was November 6, 2014 and covered proper refueling techniques. The MS4 Coordinator is researching through the Indiana Association for Floodplain and Stormwater Management (INAFSM) for a video to play at the next quarterly meeting.

The MS4 program has purchased new spill kits for all the municipal facilities. Spill kit trainings are being planned for all Rule 13 facilities in the near future. Spill kit training educates city employees on their proper use and by using the kits an illicit discharge can be prevented.

Table VII-1 Municipal (Rule 13) Facilities

Facility Name	Facility Address	Facility Contact Name
Huntington Municipal Airport	1365 Warren Road Huntington, IN 46750 260-356-8515	Steve Gray
Huntington Parks & Recreation	1205 W Park Dr Huntington, IN 46750 260-358-2323	Bob Caley
Street Department	634 Webster St. Huntington, IN. 46750 260-356-4720	Bob Caley
City Garage	384 Briant St. Huntington, IN. 46750	Bob Caley
City Building (Police Dept. and City Building)	300 Cherry St. Huntington, IN. 46750 260-356-1400	Anthony Goodnight
Fire Station 3	1333 Etna Ave. Huntington, IN. 46750 260-356-2331	Tim Albertson
Water Pollution Control Department	20 Hitzfield Street Extended Huntington, IN 46750 260-358-2314	Annette Carroll
Water Department	2290 Engle Road Huntington, IN 46750 260-358-2309	Annette Carroll
Fire Station 2	747 Condit St. Huntington, IN. 46750	Tim Albertson
Landfill	515 South 300 West Huntington, IN 46750 260-356-0432	Bob Caley
North Water Plant	2567 West 600 North Huntington, IN 46750 260-358-2309	Annette Carroll

VIII. References

Center for Watershed Protection and Dr. Robert Pitt, University of Alabama. 2004. Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments. http://www.cwp.org

APPENDIX A

Illicit Discharge Detection
Outfall Screening Form

GENERAL INFORMATION

Outfall #: 191 Receiving Water: Wabash River Last Rainfall ≥ 0.10": 11-6-14, .31 inches
(date, inches)

Inspector: Adam Cuffriss Date: 11-10-14 Time: 9:30 Air Temp.: 45

PHYSICAL OBSERVATIONS

Flow Rate (check one): ☒ Trickle ☐ ¼ Flow ☐ ½ Flow ☐ ¾ Flow ☐ Full
*Relative to Outfall Capacity

Discharge Color: ☒ none ☐ yellow ☐ brown ☐ green ☐ red ☐ gray ☐ other

Turbidity: ☒ none ☐ cloudy

Floatables: ☒ none ☐ petroleum sheen ☐ sewage ☐ other: _____

Deposits/Stains: ☒ none ☐ sediment ☐ oily ☐ other: _____

Vegetation Conditions: ☒ normal ☐ excessive growth ☐ inhibited growth

Damage to Outfall Structure: ☒ none ☐ cracking ☐ spalling ☐ peeling paint
☐ metal corrosion ☐ other: _____

ANALYSIS

Parameter	Tested (Y/N)	Results	Equipment Used
Temperature (°C)	N		
pH	N		
Conductivity (µS/cm)	N		
E. coli (CFU/100mL)	N		

COMMENTS:

Outfall in good condition 3 36" pipes.

MUST ATTACH PHOTO OF OUTFALL TO BACK OF THIS FORM TO COMPLETE DOCUMENTATION OF INSPECTION


191

Illicit Discharge Detection
Outfall Screening Form

GENERAL INFORMATION

Outfall #: 202 Receiving Water: Little River Last Rainfall ≥ 0.10": 11-6-14, .31 inches
(date, inches)

Inspector: Adam Cuffriss Date: 11-10-14 Time: 1:32 Air Temp.: 58

PHYSICAL OBSERVATIONS

Flow Rate (check one): ☒ Trickle ☐ ¼ Flow ☐ ½ Flow ☐ ¾ Flow ☐ Full
*Relative to Outfall Capacity

Discharge Color: ☒ none ☐ yellow ☐ brown ☐ green ☐ red ☐ gray ☐ other

Turbidity: ☒ none ☐ cloudy

Floatables: ☒ none ☐ petroleum sheen ☐ sewage ☐ other: _____

Deposits/Stains: ☒ none ☐ sediment ☐ oily ☐ other: _____

Vegetation Conditions: ☒ normal ☐ excessive growth ☐ inhibited growth

Damage to Outfall Structure: ☒ none ☐ cracking ☒ spalling ☐ peeling paint
☐ metal corrosion ☐ other: minor spalling

ANALYSIS

Parameter	Tested (Y/N)	Results	Equipment Used
Temperature (°C)			
pH			
Conductivity (µS/cm)			
E. coli (CFU/100mL)			

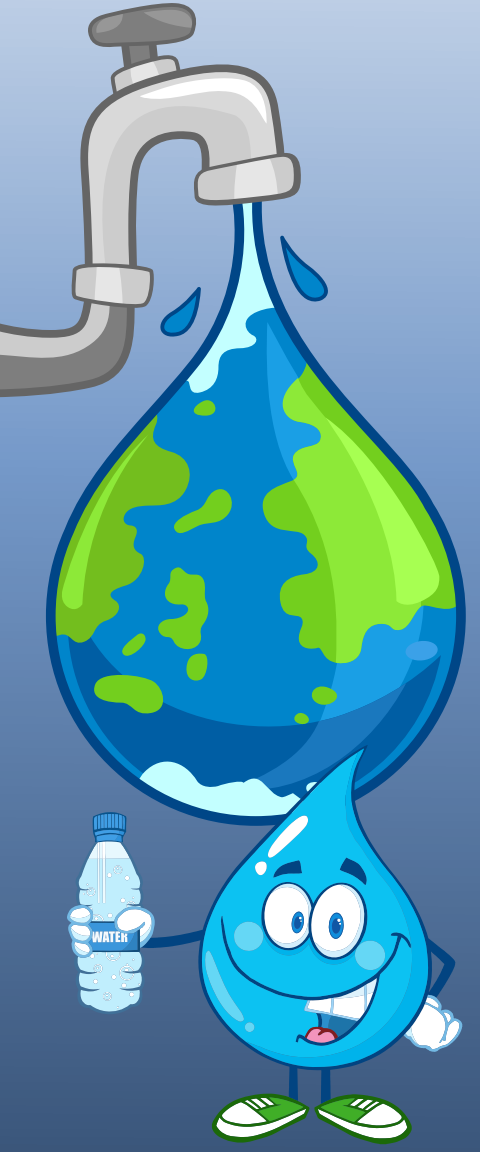
COMMENTS:

MUST ATTACH PHOTO OF OUTFALL TO BACK OF THIS FORM TO COMPLETE DOCUMENTATION OF INSPECTION


202

APPENDIX B

Clean Water



Everybody's Business

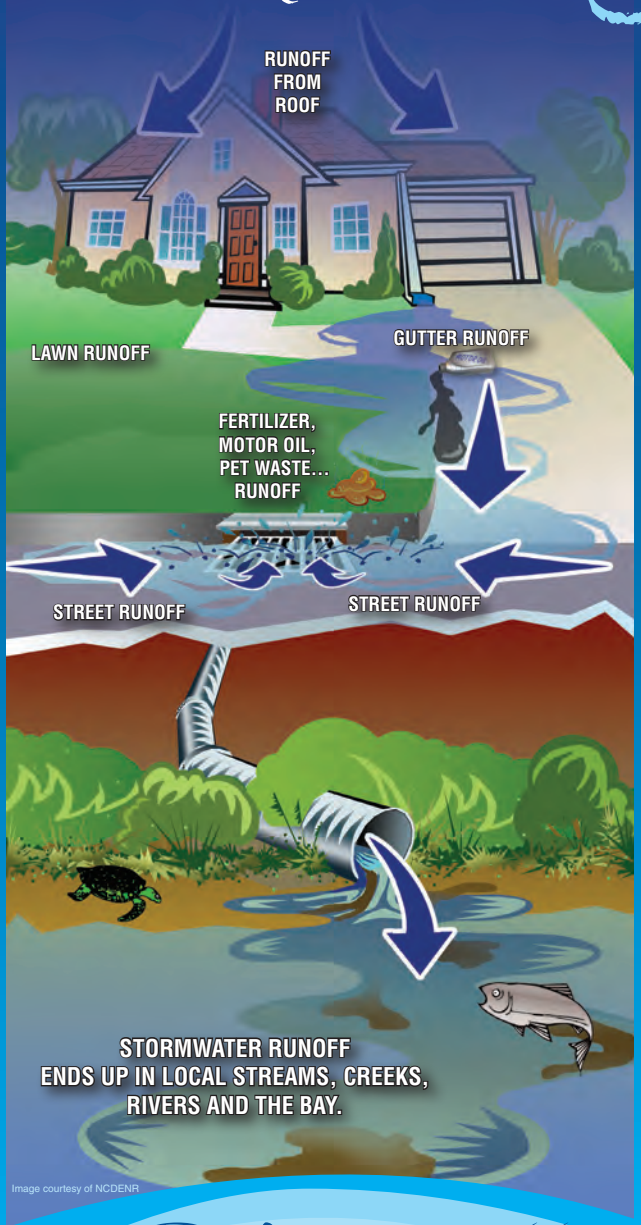
10 Things You Can Do to Prevent Stormwater Runoff Pollution

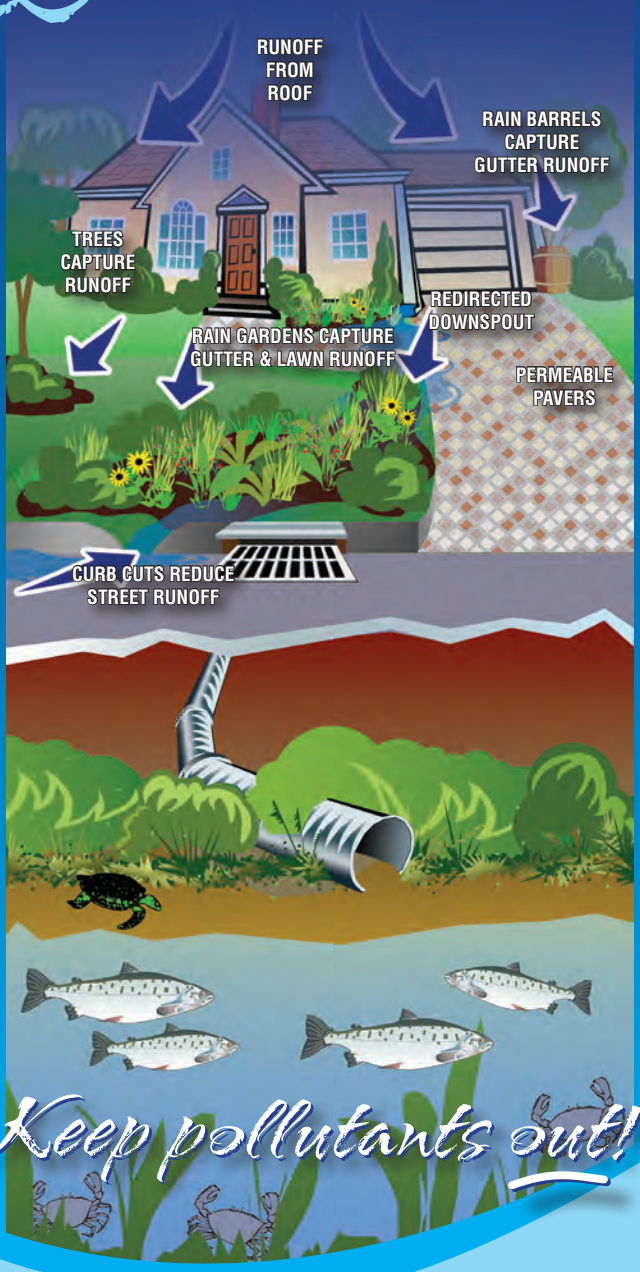
- Use fertilizers sparingly and sweep up driveways, sidewalks, and gutters
- Never dump anything down storm drains or in streams
- Vegetate bare spots in your yard
- Compost your yard waste
- Use least toxic pesticides, follow labels, and learn how to prevent pest problems
- Direct downspouts away from paved surfaces; consider a rain garden to capture runoff
- Take your car to the car wash instead of washing it in the driveway
- Check your car for leaks and recycle your motor oil
- Pick up after your pet
- Have your septic tank pumped and system inspected regularly

EPA United States Environmental Protection Agency

For more information, visit
www.epa.gov/nps or
www.epa.gov/npdes/stormwater

Before & After





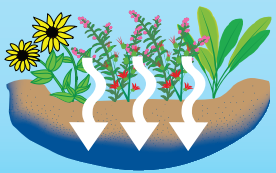
Keep pollutants out!

Reduce runoff...

SLOW IT DOWN

SPREAD IT OUT

SOAK IT IN!!!



RainScaping.org

Beautiful Solutions to Water Pollution!

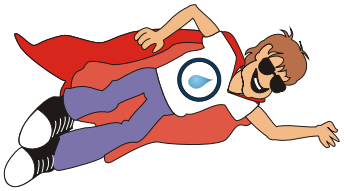
Oil & Water

Please Don't Mix!

WHEN IT RAINS
IT DRAINS

Leaves don't belong in the stormdrain

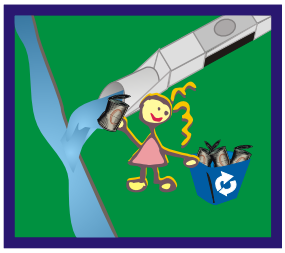
GIVE WATER A HAND



I'm a

CLEAN WATER ACTION HERO

MAKE A SPLASH



CLEAN UP YOUR TRASH

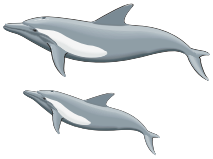
Junk from the Gutter

Makes us Sputter

Clean Water

I Can Help!

Please Don't Pour

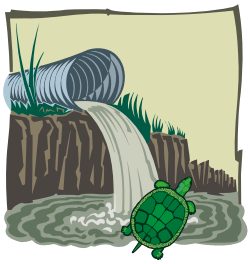


That's Our Front Door

Muck! Yuck!

Sad Duck

DIRT IN THE DRAIN



TURTLES COMPLAIN

Wave of the Future!

Will We Swim In It?