



FARMERS
BRANCH

Ordinance 3718

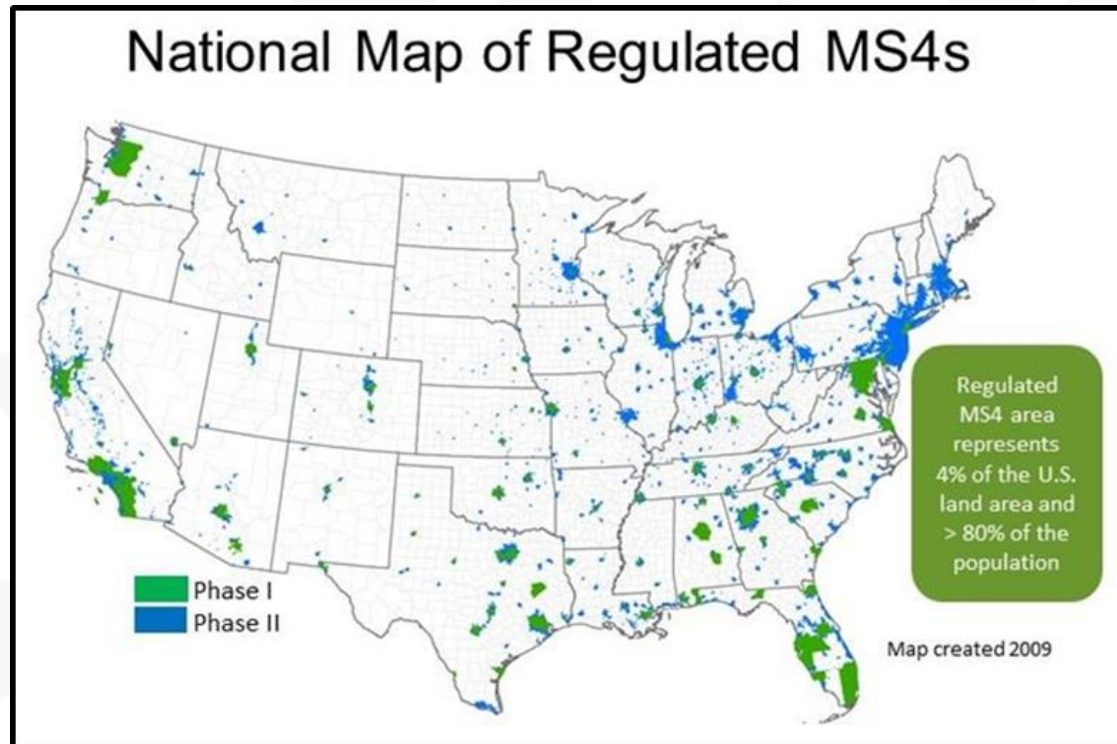
Illicit Discharge Detection and Elimination



Municipal Separate Storm Sewer System (MS4)

Clean Water Act (1977)

- EPA issues rules on how to implement (CWA)
 - **Point** Source Pollution
 - **Non-point** Source Pollution (NPDES)
 - Phase I & II MS4s
- Authority to implement NPDES in Texas given to Texas Commission on Environmental Quality (TCEQ).
 - Texas Pollutant Discharge Elimination System
 - MS4s apply to TCEQ for permit
 - Other MS4s in Farmers Branch: TXDOT, DART, Dallas Community College



City of Farmers Branch is a Small MS4

- Municipal Separate Storm Sewer System - system of conveyances (including sidewalks, roads, with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, or storm drains) owned and operated by the city and designed or used for collecting or conveying stormwater, and which is not used for collecting or conveying sewage.
 - MS4s may discharge directly to U.S. waters if complying with the TPDES General Permit.
- Phase II TPDES Permits
 - First Phase II permit issued in 2008.
 - Reissued approximately every 5 years.
 - 2019 beginning of third permit term for Farmers Branch.
 - City submitted NOI and SWMP by July 27, 2019.
 - City received NOD on November 18, 2021.
 - Technical review completed December 15, 2021.
 - Next step before approval is Public Notice (notice not yet available from TCEQ).

Permit Regulatory Authority Requirements

SWMP must address the following areas to improve water quality and address non-point source pollution. 3 of the 5 require establishment of regulatory authority by the municipality.

1. Public Education, Outreach & Involvement
2. **Illicit Discharge Detection & Elimination (IDDE)**
3. **Construction Site Stormwater Runoff Control**
4. **Post Construction Stormwater Management in New Development & Redevelopment**
5. Pollution Prevention & Good Housekeeping for Municipal Operations

The IDDE Ordinance must do the following:

1. Prohibit illicit discharges, illicit connections, and illegal dumping.
2. Authorize the City to conduct source investigations to eliminate illicit discharges, illicit connections, and illegal dumping to the MS4.
3. Authorize the City to assess penalties for illicit discharges, illicit connections, and illegal dumping to the MS4.

The proposed IDDE Ordinance updates the city ordinance.

- ✓ Details what is and is not regulated - not more regulation just more detailed regulation in once section of the ordinance.
- ✓ Definitions and reference to the applicable regulations at the State and Federal level.
- ✓ Incorporates lessons learned from other MS4s.
- ✓ Effective & enforceable – Standard Operating Procedures for city staff.



Questions