Department Note: As MS4 Permittees demonstrate compliance differently and MS4 Permittees may have different MS4 permit conditions, the following written program procedure is intended to provide ideas on various formats. Therefore, please note the provided example may not be appropriate, as is, for your community. Additionally, the following is a written program procedure that has been submitted to the Department by a MS4 Permittee. However, the MS4 Permittee name have been removed to keep them anonymous.

IDDE PROGRAM

CITY OF SOGGY SPRINGS

The following written program procedure was submitted to the Wisconsin DNR by a MS4 Permittee. However, the MS4 Permittee name have been removed to keep them anonymous. Uploaded to MS4 BMP Menu January 2025.

ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM

PURPOSE OF PROGRAM

The City of Soggy Springs seeks to minimize the negative effects of development and pollution, while maximizing environmental protection and conservation. Protecting and preserving the quality of the City's surface water runoff is a key focus area of the IDDE Program. The City has approximately 29 major storm sewer outfalls, some of which discharge directly to Fowler Lake, Crystal Lake, and the Soggy Springs River. Each of these outfalls has the potential to carry other discharges introduced to the storm drainage system such as sanitary sewage, waste oil, industrial waste, and other substances that may harm downstream water quality

The City's IDDE program is managed by the Director of Public Works and/or designee, Assistant Director of Public Works. Maintenance staff, citizens, and construction site inspectors also play an important role identifying illicit discharge problems and responding to clean-up requests. However, all Public Works, Utilities, Planning, Parks, Police, Fire staff as well as citizens will play a role in locating, identifying and reporting potential illicit discharges.

INCIDENT REPORTING

Water quality incidents can be reported outside of normal City Hall business hours (7:30 am – 4:30 pm) by calling the Police Non-Emergency number (Number). (After hours messages left on the Public Works voicemail (Number) will be follow-up with the caller during the next business day).

PROGRAM SCOPE

On-going dry weather screening shall be conducted all major outfalls at least once during the term of the permit i.e. screen 20 % of major outfalls annually except for major outfalls that have been deemed "priority outfalls" which will be screened annually. Priority outfall inspections will be selected on a watershed basis, with individual investigations focusing on the outfalls draining to a watershed or areas with a reasonable potential for containing illicit discharges or other sources of non-stormwater discharges. Minor outfall inspections will be prioritized with consideration given to total drainage area, population and traffic density, age of structures and buildings, history of the area, and land use types.

The following written program procedure was submitted to the Wisconsin DNR by a MS4 Permittee. However, the MS4 Permittee name have been removed to keep them anonymous. Uploaded to MS4 BMP Menu January 2025.

PROGRAM FUNDAMENTALS

The Illicit Discharge Detection and Elimination (IDDE) Program developed by the City of Soggy Springs consists of four fundamental elements:

1.) IDDE Ordinance
2.) Storm Sewer System Mapping
3.) IDDE Field Screening
4.) IDDE Source Identification and Elimination

IDDE Ordinance

[redacted]

Storm Sewer Outfall Mapping

The main objective of the storm sewer outfall mapping program element is to locate, inventory, and document the physical location of the stormwater collection system. The City and/or it's consulting engineering firm keeps the database current by adding new storm sewers as develop occurs. The map identifies MS4 outfalls, some of which discharge to waters of the state (major outfalls). The City estimates that the storm drainage infrastructure includes 29 major outfalls, some of which discharge to either the Soggy Springs River, Fowler Lake, or Crystal Lake. The locations of municipal garages, storage areas and other Public Works facilities are depicted on a separate map which includes public and privately-owned structural stormwater facilities and manufactured treatment devices to aid in inspection of those facilities.

IDDE Field Screening Procedure

On-going dry weather screening shall be conducted all major outfalls at least once during the term of the permit i.e. screen 20 % of major outfalls annually except for major outfalls that have been deemed "priority outfalls" which should be screened annually. Prioritization of major outfalls are those that are in areas that are most likely to include illicit discharges and are set based on drainage area characteristics such as hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types when selecting outfalls for annual field screening. Outfall prioritization spreadsheet is attached and part of this IDDE Program Manual.

Outfall Selection: Contributing drainage area characteristics or land uses that should be considered when selecting priority outfalls are:

- History of known or suspected illicit discharges reported in the last five years.
- Sections of storm sewer and/or sanitary sewer infrastructure that have exceeded or are approaching their design/useful life.
- Contributing drainage areas with 80 or more percent imperviousness.
- Business or industrial parks with frequent changes in property ownership or operations.
- Schools or other institutional facilities.
- Commercial or industrial operations that generate wastewater or wash water including food processing, metal plating or machine shops, auto and scrap recyclers, commercial car washes and chemical manufacturers or users.

Responsibility: Inspections are the responsibility of the department of Public Works. Inspections will be performed by City staff. Key personnel for the City include the Assistant Director of Public Works, and an Engineering Department intern.

Timing: Timing is important when scheduling inspection days. The preferred conditions for outfall inspections include:

- Dry season – preferably in summer or early fall
- No run-off producing rainfall within previous 48 hours
- Low vegetation (avoid late spring when access may be hindered by heavy vegetation)

The preferred conditions allow detection of flows when there should be none and prevent the dilution of pollutants.

Equipment: Flash light, marker paint, manhole pick, camera, incident response forms, safety gear, field test kit, cell phone.

Visual Observation: As part of the visual observation screeners will report on the field screening sheet the physical condition of each outfall and its immediate vicinity. Also note whether the outfalls have maintenance issues, such as sediment build up, trash around the outfall or damaged infrastructure that should be brought to the attention of the Director of Public Works. Additionally, each outfall will be inspected for physical signs of illicit discharges indicated by such things as unnatural odors, unusually colored water, oil sheen, surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illicit dumping. If flow is observed a field analysis shall be conducted (See *Field Analysis* below). If the additional sampling indicates illicit discharges, a source identification investigation will be conducted.

Field Analysis: If flow is observed, a field analysis shall be conducted utilizing a portable field sampling kit or device to determine the presence of illicit non-storm water discharges or illicit dumping. The field analysis parameters (summarized in below table) shall include sampling for conductivity, pH, temperature, and total chlorine. If field testing results triggers any of the sampling indicator parameter action levels summarized in Table 1 on page 13, or cause suspicion of other parameters listed in table below then a source investigation would be performed. Collection of samples for laboratory analysis may be considered in instances where non-definitive sources exist. The source investigation procedure is outlined in the Source Investigation and Elimination section of this manual beginning on page 13.

Water Quality Test Parameters and Uses:

Water Quality Test	**Field or Lab Test**	**Use of Water Quality Test**
Conductivity	Field	Used as an indicator of dissolved solids.
pH	Field	Extreme pH values (high or low) may indicate commercial or industrial flows.
Temperature	Field	Sanitary wastewater and industrial cooling water can substantially influence outfall discharge temperatures.
Ammonia	Lab	High levels can be an indicator of the presence of sanitary wastewater
Surfactants	Lab	Indicate the presence of detergent (e.g. laundry, car washing)
Total Chlorine (or Fluoride)	Field	Used to indicate inflow from potable water sources. (Not a good indicator of sanitary wastewater because chlorine will not exist in a "free" state in water for long (it will combine with organic compounds).

Water Quality Test Parameters and Uses (cont.):

Potassium	Lab	High levels may indicate the presence of sanitary wastewater.
Bacteria	Lab	Sanitary wastewater or septic systems.
Copper	Lab	Thiocarbamate Slide Test, benchmark of less than 0.020 mg/L
Phenol	Lab	4-Aminoantioyrine Slide, Spectrophotometric

Enforcement: Enforcement of identified illicit discharges will follow the procedure outlined in the IDDE Ordinance section under "Enforcement", beginning on page 4 of this Program booklet.

Laboratory analysis is necessary for some parameters such as suspicion of sanitary sewage and recommended in cases where enforcement action may be necessary to eliminate illicit discharges or connections.

IDDE Source Investigation and Elimination.

If a storm sewer outfall screening investigation identifies the presence of illicit discharges, an advanced investigation will be initiated according to priority level to identify source of the discharge. Laboratory analysis is necessary for some parameters such as suspicion of sanitary sewage and recommended in cases where enforcement action may be necessary to eliminate illicit discharges or connections. The City is contracted with Northern Lake Service, Inc., for laboratory services. The City has been provided sample containers for various water quality test parameters.

The below Table provides a guideline as to the likelihood of an illicit discharge.

Indicator Parameters Action Level: **TABLE 1**

Parameter	Action Level	Illicit Sources	Non-Illicit Sources
Ammonia	0.1 mg/l	Sanitary sewage and industrial wastewater	Pets, wildlife and potentially WPDES permitted discharges
Detergents	0.5 mg/l	Industrial cleansers, commercial wash water and sanitary sewage	Residential car washing
pH	Less than 6 or greater than 9	Industrial wastewater and concrete truck wash-out	Groundwater and WPDES permitted discharges
Total Chlorine	Detection or positive test unless associated with a WPDES permitted discharge at background water supply levels	Industrial wastewater, swimming pools and sanitary sewage	WPDES permitted discharges
Total Copper	0.1 mg/l	Copper-based product use and manufacturing	WPDES permitted discharges
Phenol	Detection or positive test	Chemical, textile, paint, resin, tire, plastic, electronics and pharmaceutical manufacturing	None
Fluoride	Detection above background groundwater or water supply levels	Commercial and industrial wastewaters with a water supply component	Groundwater and WPDES permitted discharges
Potassium	10 mg/l	Sanitary sewage and industrial wastewater	Groundwater and WPDES permitted discharges
E. coli	10,000 MPN/100 mL	Sanitary sewage	Wildlife and pets
Human Bacteriodes	Detection or positive test	Sanitary sewage	None

(This Table is an excerpt from Wisconsin DNR Program Guidance Memorandum #3800-2012-01)

Priority Level Ranking/Suspected Pollutants/Response Time:

Priority Level	Suspected Pollutants		Response (days)
1	• Alkalis • Automotive products • Bases • Cleaning products • Degreaser or solvent • Drain cleaner • Fertilizer • Flammable/explosive materials	• Herbicide • Metals • Painting products • Pesticide • Petroleum • Process Wastewater • Sewage • Unknown chemicals	1-2
2	• Ammonia • Construction runoff (silt, sediment, gravel)	• Detergents • Food waste (fats, oils, grease) • Soap	3-5
3	• Non-Residential - Car washing • Pressure washing waste • Spa or pool water	• Steam cleaning waste • Yard waste	5-7
4	• Animal carcasses • Bacteria • Construction materials • Debris	• Foam • Rust • Trash • Other	Within 10 days

*Response times are given in working days

Priority levels are based on field screening results or sensory observations if potential of harm to public health or water quality threat posed by a given pollutant. After hours contact the Police Non-Emergency # (Number), the WDNR 24- Hour toll free spill hotline 1-800-943-0003 and the City Public Works Department (Number) immediately if the discharge poses a severe threat to human health or the environment.

Response Procedure:

(NOTE: City response time starts right after initial field screening test results trigger any measurable action level or positive detection test). An advanced investigation will be initiated **according to priority level** to identify the source of the discharge.

PREPARATION FOR OUTFALL SCREENING FIELD INVESTIGATION

Office Data Collection. Before a team enters the field, all available information should be obtained pertaining to the storm sewer system(s) being investigated. Such information could include maps of all storm sewer outfalls, land use within the drainage area, locations of NPDES permitted dischargers, and all known or suspected polluting activities within the drainage area. The field crew should become familiar with this information prior to the field investigation and should bring as much material as is appropriate into the field with them.

Field Crew. A field crew consists of *at least two* individuals fully trained in illicit discharge investigation techniques. Each crewmember should also be able to operate all equipment required to conduct an illicit discharge detection investigation. Furthermore, each crewmember should be completely familiar with all City policies related to safety.

It is the field crew's responsibility to locate all storm sewer outfalls, to obtain the physical details of the outfall (size, material type), to conduct the investigation for evidence of illicit connections, to complete all data logging activities, and to notify the appropriate individuals in the event of the discovery of an illicit connection so that source identification and elimination activities can be initiated as appropriate. The field crew is also responsible for their own safety.

Consideration should be given to the diurnal timing of an inspection as various activities that could result in illicit discharges change throughout the day. For instance, residential wastewater generation is typically highest in the morning as people prepare for the workday. An investigation into a possible sanitary sewer illicit connection should be conducted in the morning during a time when it is most likely to see/collect evidence of sanitary sewer discharges into the storm sewer system.

Any indications of illicit discharges based off sensory observations or field analysis results should be clearly noted on the investigation checklist and the watershed tributary to the outfall should be flagged for a follow-up investigation to identify the source of the illicit discharge.

Properly dispose of the wastes from a field test kit in a bottle carried into the field for this purpose. When returning to the office test kit wastes should be disposed of into a sanitary sewer collection facility.

Follow-up Office Activities. Upon returning to the office all data should be filed appropriately. Findings of damaged outfalls should be given to the Department of Public Works Supervisor for follow-up repair activities. Any potential illicit discharges should be immediately added to the source identification investigation schedule.

Equipment. Appropriate equipment should be gathered prior to leaving for the field. Typical equipment would be the same as required to complete an outfall screening investigation. However, the source identification investigation may very likely involve sampling within manholes. In such cases, all appropriate field equipment including, but not limited to, fall arresters, hard hats, respirators, etc., may be required. Only field crews who are fully trained for confined space entry should attempt to enter confined spaces

such as manholes, and only after all appropriate preparations have been made.

CONDUCTING SOURCE IDENTIFICATION FIELD INVESTIGATIONS

After conducting the mapping evaluation, a manhole-by-manhole inspection should be conducted to pinpoint the location in the storm sewer system that is the source of the inappropriate discharge. The inspection requires a two-person crew to revisit the outfall where the polluted dry-weather discharge was detected. The outfall should be revisited as soon as is practicable after the outfall screening. After confirming that dry-weather flow is present at the outfall, the field crew should move upstream to the next manhole or access point on the storm sewer system. If flow is present at this manhole, sampling and testing should be conducted as outlined under the outfall screening procedures.

If the flows at the upstream sampling location have been identified as being consistent with the initially identified inappropriate discharge, the field crew should move to the next upstream manhole and repeat the procedures. In cases where more than one source of dry-weather discharge enters a manhole, the field crew should record this information on the screening form and then track each source separately. All sources should be tracked upstream, manhole-by-manhole, until the dry weather discharge is no longer detected. The field crew should identify the last manhole where dry-weather flow is present and assess the potential sources in the vicinity of that manhole.

The field crew should also determine whether there has been a change in the flow rate between manholes. If the flow rate appears to have changed between two manholes in the system, an illicit connection could likely exist between the two manholes. Changes in the concentration of pollutant parameters could also aid in confirming the presence of an illicit connection between the two manholes.

Once the manhole inspection has identified an outfall area (between two manholes) suspected of containing an inappropriate discharge, source testing will be necessary. If there is only one possible source to this section of storm sewer source identification and follow-up for corrective actions should be straightforward. Multiple sources, or non-definitive sources, may require additional evaluation and testing such as fluorometric dye testing, smoke testing, or remote sewer televising. Collection of samples for laboratory analysis may be considered in instances where non-definitive sources exist, or where the generator of the pollutant is uncooperative in the source identification investigation.

Enforcement: Enforcement of identified illicit discharges will follow the procedure outlined in the IDDE Ordinance section under “Enforcement”, beginning on page 4 of this Program booklet.

Laboratory analysis is necessary for some parameters such as suspicion of sanitary sewage and recommended in cases where enforcement action may be necessary to eliminate illicit discharges or connections.

Spill Response Procedure

PURPOSE OF PROGRAM

The purpose of this Spill Response Procedure is to provide a framework for spill response procedures in City of Soggy Springs and to comply with the Wisconsin Department of Natural Resources WPDES Permit. All employees are expected to work cooperatively with state and local agencies to define, contain, and clean up spills.

This manual is designed to provide general response procedures to City of Soggy Springs's employees. However, each situation is unique and field conditions may determine different procedures. Home and mobile telephone numbers are not to be released to the public. However, all Public Works, Utilities, Planning, Parks, Police, Fire staff as well as citizens will play a role in locating, identifying and reporting spills.

SAFETY FIRST -Follow all appropriate safety procedures when dealing with any spill.

For the City of Soggy Springs , P.E., Assistant Director of Public Works, is the designated Illicit Discharge Coordinator. If is not available, contact the following people in the following order to act as Illicit Discharge Coordinator in his absence:

Director of Public Works – (Number)

INCIDENT REPORTING

a.) If it is obvious that there is a fire, explosion or safety hazard to life and health, threat to the environment, or need to evacuate, contact the appropriate call center or notification system (such as 911) immediately. This includes any incident involving petroleum sheen, sheen from any unknown source or a highly suspicious material.
b.) Notify the Illicit Discharge Coordinator of reported spill or illicit discharge.

If the incident is determined to be a spill, with a risk of fire explosion or safety hazard to life, health or the environment or a need to evacuate, the Fire Department will follow their spill procedures. The remainder of this document is not intended to conflict with or supersede any of their procedures.

Spills can be reported by calling:

- Fire Department [redacted]
- Police Department (Emergency dial 911, Non-emergency
- Department of Public Works/Engineering (if a voicemail is left after hours (7:30am to 4:30pm) the Illicit Discharge Coordinator will return the call the next business day) [redacted]
- Department of Public Works Supervisor [redacted]

- DNR 24-hour toll-free hotline 1-800-943-0003
- County Emergency Management Coordinator [redacted]

COORDINATION AND CONTAINMENT

NOTE: In circumstances when a spill or illicit discharge originating in the City of Soggy Springs discharges directly to a municipal separate storm sewer or property under the jurisdiction of another municipality, that jurisdiction or municipality shall be notified of the incident as soon as possible but at least within one working day.

Procedure

a.) Identify persons and agencies that need to be notified and involved in the situation providing as much information as possible.
b.) Contain the spill or illicit discharge safely and legally through necessary means; this may require the efforts of multiple parties listed above.
c.) d) Determine if the spill is "reportable" to the WDNR (using standards found in http://dnr.wi.gov/files/pdf/pubs/rr/rr559.pdf) in Appendix D. If reportable, contact the WDNR through the spill hotline (1-800-943-0003).
d.) If the spill is not "reportable", contact the SE Region WDNR Spills Coordinator at 1-414-263-8524.
e.) If a responsible party has been identified, they are to take control of the situation as soon as practical and shall continue containment, cleanup and disposal of the substance as required by local and state agencies.

CLEANUP, EVIDENCE COLLECTION AND DOCUMENTATION

a.) Cooperate with those people involved in managing the incident
b) Locate the source of the spill or illicit discharge
c) Attempt to locate the responsible party

The City of Soggy Springs may use any of the following strategies or any combination thereof to locate the source and responsible party of a spill:

- Visual and smell indicators
- Field test kit
- Uncover manholes upstream to identify where flow may be coming from and use additional samples and tests as needed to isolate potential source areas
- Utilize available MS4 mapping to assist in tracking upstream of the incident
- Obtain access to private property to obtain samples and perform tests.

d) Collect evidence

e) Document the entire process

The following documentation will be kept to the maximum extent possible during a spill or illicit discharge event

- An ongoing written log
- When necessary, complete WDNR Form #4400-91 (see Appendix C)
- Pictures
- Sketches or Maps
- A list of the names of those who have been involved, their agency and contact information.
- Other data as may be deemed appropriate by those involved in managing the incident
- Samples - Samples will be collected from the following locations if theyare accessible and conditions are safe:
  -Suspected source of the spill or discharge (discharge substance and/or site soil)
  -Down-gradient of the suspected source
  -Up-gradient of the suspected source

f) Clean up the spill or illicit discharge

Parties responding to the incident will work downstream to determine the extent of cleanup required.

If the Responsible Party is identified, they will be notified and directed to correct the problem. The Responsible Party is required to provide adequate cleanup for a spill or illicit discharge. The City of Soggy Springs will follow the enforcement procedures as outlined in the Illicit Discharge Ordinance. The City of Soggy Springs will notify WDNR if an illicit discharge is not cleaned up and removed after 30 days to discuss further options.

If the Responsible Party cannot be identified, the City of Soggy Springs will work with WDNR to ensure that the necessary steps are taken to clean up the spill or illicit discharge. The WDNR may be contacted to discuss any funding opportunities that may be available. WDNR may be contacted for assistance in hiring a qualified contractor and will be kept informed of the progress of a cleanup.

g) Work toward cost recovery

Once the responsible party has been identified every effort will be made to receive cost recovery of funds expended by the City of Soggy Springs. The WDNR may be contacted to discuss any funding opportunities that may be available.

EVALUATION AND REPORTING

a) Evaluate the process and procedures

The Illicit Discharge Coordinator will contact the parties involved in the event to discuss what went right, what went wrong, and any suggested improvements to the process and

procedures. This information will be kept in the City of Soggy Springs Department of

Public Works/Engineering Office.

b) Report cleanup efforts

All files regarding spill events created and kept by Western Lakes Fire Department. All files regarding spills and illicit discharges created by the Illicit Discharge Coordinator shall be kept in the Department of Public Works/Engineering Office. Reports will be made to the following agencies as appropriate for each incident:

- Waukesha County Emergency Management
- WDNR

All files will be made available to the City of Soggy Springs Stormwater Coordinator for the Annual Report.

APPENDIX

CITY OF Soggy Springs
ILLICIT DISCHARGE FIELD SCREENING SHEET

SECTION 1: BACKGROUND DATA

Subwatershed:		Outfall ID:
Today's date:		Time (Military):
Investigators:		Form completed by:
Temperature (°F):	Rainfall (in.): Last 24 hours:	Last 48 hours:
Nearest Intersection / Location:		
Photo #s:		Land use in drainage area: High Density Residential, Commercial
Notes (e.g., origin of outfall, if known):		

SECTION 2: OUTFALL DESCRIPTION

Location	Material	Shape	Dimensions (in.)	Submerged
☐ Closed Pipe ☐ Open Drainage				
Flow Present?	☐ Yes ☐ No *If No, Skip to Section 5*			
Flow Description	☐ Trickle ☐ Moderate ☐ Substantial			

SECTION 3: QUANTITATIVE CHARACTERIZATION

Flow Depth	Flow Width	Measured Length	Time of Travel	Volume	Total Chlorine	Temperature (F)	pH	Conductivity
					☐ Yes ☐ No		<6 ☐ Yes >9 ☐ Yes	☐ Yes ☐ No

SECTION 4:
PHYSICAL INDICATORS FOR FLOWING OUTFALLS ONLY

Is Any Physical Indicator Present in the flow? ☐YES ☐NO

INDICATOR	DESCRIPTION
☐ Odor	☐ Sewage ☐ Rancid/Sour ☐ Petroleum/Gas ☐ Sulfide ☐ Other : _____
☐ Color	☐ Clear ☐ Brown ☐ Gray ☐ Yellow ☐ Green ☐ Orange ☐ Red ☐ Other: _____
☐ Turbidity	☐ 1 - Slight Cloudiness ☐ 2 - Cloudy ☐ 3 - Opaque
☐ Floatables	☐ Sewage (Toilet Paper, Etc.) ☐ Suds ☐ Petroleum (Oil Sheen) ☐ Other : _____

SECTION 5:
PHYSICAL INDICATORS FOR BOTH FLOWING AND NON-FLOWING OUTFALL

Are Any Physical Indicators that are not related to flow present? ☐**Yes** ☐ **No**

INDICATOR	DESCRIPTION
☐ Outfall Damage	☐ Spalling, Cracking or Chipping ☐ Corrosion ☐ Peeling Paint
☐ Deposits/Stains	☐ Oily ☐ Flow Line ☐ Paint ☐ Other:_____
☐ Abnormal Vegetation	☐ Excessive ☐ Inhibited
☐ Poor Pool Quality	☐ Odors ☐ Suds ☐ Floatables ☐ Yellow ☐ Oil Sheen ☐ Excessive Algae ☐ Other: _____

SECTION 6: DATA COLLECTION

1. Sample for the lab?	☐ Yes	☐ No
2. If yes, collected from:	☐ Flow	☐ Pool
3.. Are any boxes in Section 3 checked for potential illicit discharge?	☐ Yes	☐ No

	FACILITY	ADDRESS	City	CONTACT	PHONE	mailed	Rec'd	Comments
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								

	FACILITY	ADDRESS	City	CONTACT	PHONE	mailed	Rec'd	Comments
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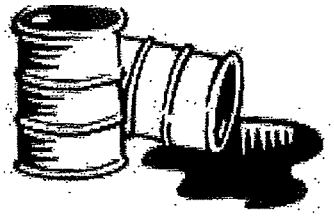

DNR Staff Provide Spill Response and Support

RR-559 July 2014

Rarely does anyone ever plan a spill. Spills are typically caused by accidents of some sort, but when they do occur, the people involved with a spill must comply with state requirements. Wisconsin law mandates that spills of hazardous substances be immediately reported and cleaned up to protect Wisconsin's citizens and natural resources. When a spill occurs, the DNR has staff located in regional offices around the state to help in a variety of ways.

Responding To Spills

During Normal Working Hours

When calls are made to the DNR spill hotline during the day, the information comes directly to the DNR office in Madison, and is forwarded to the Regional Spill Coordinator for follow-up.

After Hours

During the evening hours and on weekends, the phone calls are directed to the Wisconsin State Patrol, who will fo1ward the information to a DNR duty officer. That duty officer will then alert the On-Call Spill Coordinator to the situation.

The DNR encourages the public to report hazardous substance spills using the 24-hour toll-free hotline: 1-800-943-0003

DNR Field Response

DNR Wardens and Regional Spill Coordinators

The first responders to a hazardous substance spill for the DNR may be a field warden or regional spill coordinator. Wardens are more likely to respond in remote areas since they are widely distributed across the state. Each county has at least one warden. Wardens know local responders, such as fire and police personnel, are familiar with the natural resources impacted by a spill, and can assist the responsible party in managing the spill.

Spill coordinators (working in the DNR's Remediation and Redevelopment Program} are located in each of the regional DNR offices. These spill coordinators specialize in technical spill response issues and are available before, during, and after spills occur.

When a field warden or regional spill coordinator gets a call about a spill, their follow up may include additional phone calls to get more information about the nature of the spill, going to the site, and/or requesting other DNR assistance (e.g. fish managers, water resources staff and pubic information specialists}.

When an emergency situation occurs and the responsible party is not available or willing to take action, DNR will call in a zone contractor to respond to the spill. Zone contractors are emergency response companies that provide statewide emergency response services in such situations.

Wisconsin Depadment of Natural Resources
P.O. Box 7921, Madison, WI 53707
dnr.wi.gov, search "brownfield"

Wisconsin DNR - Hazardous Substance Spills

Remediation and Redevelopment Program **November 2016**

Immediate Reporting Required for Hazardous Substance Spills

If you are aware of a hazardous substance spill notify the Department of Natural Resources (DNR). State law requires the IMMEDIATE reporting of hazardous substance spills and other discharges to the environment.

CALL 800-943-0003 TO REPORT SPILLS

Use DNR Form 4400-225 to report other hazardous substance discharges

Other hazardous substance discharges, including historical contamination and contamination caused by an ongoing long-term release, discovered during an environmental assessment or laboratory analysis of soil, sediment, groundwater or vapor samples, should be reported to the DNR by filling out and submitting DNR Form 4400-225, "Notification for Hazardous Substance Discharge (Non-Emergency Only);' which is is available at dnr.wi.gov.

../ Report hazardous substance discharges as soon as visual or olfactory evidence confirms a discharge or laboratory data is available to document a discharge. Do not wait to complete a Phase II environmental assessment, or other similar report, to notify the DNR.

Reporting is everyone's responsibility

Individuals and entities that cause a hazardous substance spill or discharge to the environment are required by state law to notify the DNR immediately - as soon as the spill or discharge is identified. Individuals and entities that own or control property where the spill or discharge occurred must report the discharge immediately if it is not reported by the person or entity that caused the discharge.

For public health and safety, the DNR encourages everyone to report known hazardous substance discharges. Reporting a spill or other discharge, in itself, does not make a person or entity liable for the contamination.

Proper spill containment, cleanup, and disposal is always required

Every person/entity (including lenders and local governments) that causes a hazardous substance discharge, or owns or controls property at which a discharge occurred, must comply with the response action requirements in Wis. Admin. Chs. NR 700 to 754. No spill or discharge is exempt from the duty to properly contain, clean up and dispose of the substance and associated contaminated media, such as soil, water and other affected materials.

Spill reporting exemptions

All spills must be cleaned up, but it is generally not necessary to report recent spills that are:

- less than 1 gallon of gasoline
- less than 5 gallons of any petroleum product other than gasoline
- any amount of gasoline or other petroleum product that is completely contained on an impervious surface
- individual discharges authorized by a permit or program approved under Wis. Stats. Chs. 289 - 299
- less than 25 gallons of liquid fertilizer
- less than 250 pounds of dry fertilizer
- pesticides that would cover less than 1 acre of land if applied according to label instructions
  - * NOTE: Reporting is required if the ongoing, long-term release or application of a permitted pesticide, fertilizer or other substance accumulates to levels that exceed current health or safety standards.
- less than the federal reportable quantities listed in 40 C.F.R. §§ 117 or 302
  - * NOTE: U.S. EPA (federal) spill reporting requirements are outlined on the internet at https://www.epa.gov/emergency-response/when-are-you-required-report-oil-spill-and-hazardous-substance-release.

Spill reporting exemptions do not apply (and reporting is required) when:

- the spilled substance has not evaporated or been cleaned up in accordance with Wis. Admin. chs. NR 700 - 754
- the spilled substance is a potential fire, explosion or safety hazard
- the spilled substance causes, or threatens to cause, chronic or acute human health concerns
  - * NOTE: If you are unsure about potential human health effects, consult with local or state health officials.
- the spilled substance adversely impacts, or threatens to impact, the air, lands or waters of the state (as either a single discharge or when accumulated with past discharges) - even if the degree of the impact has not yet been thoroughly evaluated
  - * NOTE: If the substance causes sheen on surface water, has entered or is on the verge of entering the waters of the state, DNR will consider the spilled substance a threat to impact, or to have adversely impacted, waters of the state and reporting is required.

Terms, definitions, statutes and rules

Hazardous substance -Any substance that can cause harm to human health and safety, or the environment, because of where it is spilled, the amount spilled, its toxicity or its concentration. Even common products such as milk, butter, pickle juice, corn, beer, etc., may be considered a hazardous substance if discharged to a sensitive area.

Discharge - Spilling, leaking, pumping, pouring, emitting, emptying, dumping, etc., to land, air or water.

Spill - A discharge that is typically a one-time event or occurrence, and usually inadvertent.

Wis. Stat. § 292.11 (2) and Wis. Admin. § NR 706.05 - Require individuals and entities that possess or control a hazardous substance, or that cause the discharge of a hazardous substance to the environment, to notify the DNR immediately about the discharge.

Wis. Stat. § 292.99 - Authorizes penalties up to $5,000 for each violation of the notification requirement.

Consult Wis. Stat. Ch. 292 and Wis. Admin. §§ 700 - 754, and dnr.wi.gov for further information on hazardous substance spill and discharge reporting, investigation and cleanup.

DNR contact information

To report a discharge call 1-800-943-0003. For more information on the spills program, including contact information , visit dnr.wi.gov, search "Spills".

Notification For Hazardous Substance Discharge
(Non-Emergency Only)

Form4400-225 (R 06/17)