Unified Washington Military Department and National Guard Policy No. 26-03

Title	Illicit Discharge Detection and Elimination (IDDE) Policy
Authorizing Source	32 CFR 651.5, Army Policies WA State Water Pollution Control Act (RCW 90.48) Municipal Stormwater Permit WAR044203
References	Army Regulation 200-1, Environmental Protection and Enhancement, 15 Apr 2026 Air Force Instruction 32-7001, Environmental Management, 23 Aug 2019
Information Contact	Environmental Program Manager, WMD/WAARNG (253) 512-8466, ENV@mil.wa.gov Environmental Engineer, 194WG, WAANG (253) 512-3218
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Mandatory Review Date	September 10, 2030
Revised	N/A
Approved By	GENT WELSH Major General, WA ANG The Adjutant General Washington Military Department Director

Purpose

To provide a framework to detect, eliminate, and prevent illicit discharges to its Municipal Separate Storm Sewer System (MS4). The goal of this policy is to protect water quality and to comply with the requirements of the Federal Clean Water Act, the National Pollution Discharge Elimination System [NPDES], the Washington State Water Pollution Control Act (RCW 90.48), and permit WAR044203 for stormwater discharges.

Scope

This policy applies to all state and federal civilian employees of the Washington Military Department (WMD) and to all members of the Washington Army National Guard [WAARNG] and the Washington Air National Guard [WAANG].

Definitions

Illicit Discharge: Any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except for discharges pursuant to a NPDES permit and other authorized non-stormwater discharges.

Municipal Separate Storm Sewer System (MS4): A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned or operated by a public body and designed for collecting or conveying stormwater.

Outfall: The point where a municipal separate storm sewer discharges to waters of the State.

Allowable Non-Stormwater Discharges: Discharges that are not composed entirely of stormwater but are not significant sources of pollutants and are not prohibited by this policy.

Responsible Party: Any person or entity who, by contract or other arrangement, is responsible for creation of the illicit discharge or hazardous material spill.

Policy

The Adjutant General (TAG) has overall responsibility for ensuring that agency activities and services support its military training and readiness operations, enhance mission accomplishment and that all WMD operations are conducted in a manner conducive to environmental stewardship.

A. Prohibited Discharges

The following discharges are **expressly prohibited**:

- Sanitary wastewater from crushed or collapsed pipes or surcharges.
- Direct septic connections into storm drains.
- Overflow from septic tanks.
- Car wash wastewater.
- Laundry wastewater.
- Improper disposal of automobile and household products.
- Dumping of oil, solvents, chemicals, or hazardous materials.
- Concrete or paint washout.
- Pet waste.
- Leaves and other debris dumped into open drainage and stream channels.

B. Allowable Discharges

The following non-stormwater discharges are permitted, provided they are not significant contributors of pollutants:

- Water line flushing.
- Landscape irrigation and lawn watering.
- Diverted stream flows.
- Rising groundwaters and uncontaminated groundwater infiltration.

- Uncontaminated pumped groundwater and water from crawl space pumps.
- Discharges from potable water sources and foundation drains.
- Air conditioning condensation.
- Flows from riparian habitats and wetlands.
- Street wash water.
- Discharges from emergency firefighting activities.
- Non-stormwater discharges authorized by another NPDES or State Waste Discharge Permit.

Additionally, the following conditionally allowable discharges may enter the MS4 system granted the state conditions are met:

- Discharges from potable water sources include, but are not limited to, water line flushing, hyper-chlorinated water line flushing, fire hydrant system flushing, and pipeline hydro-static test water. Planned discharges shall be de-chlorinated to a total residual chlorine concentration of 0.1 parts per million (ppm) or less, pH-adjusted if necessary, and volumetrically and velocity controlled to prevent resuspension of sediments in the MS4.
- Discharges from lawn watering and other irrigation runoffs, including from reclaimed water sources. These discharges shall be minimized through, at a minimum, public education activities (see NPDES Phase I MS4 Permit Section S5.C.11) and water conservation efforts.
- Discharges from swimming pool, spa, and hot tub. The discharges shall be dechlorinated/de-brominated to a total residual concentration of 0.1 ppm or less; free from sodium chloride; pH-adjusted and reoxygenated, if necessary; volumetrically and velocity controlled to prevent resuspension of sediments in the MS4. Discharges shall be thermally controlled to prevent an increase in temperature of the receiving water. Swimming pool cleaning wastewater and filter backwash shall not be discharged to the MS4.
- Street and sidewalk wash water and water used to control dust. The Permittee shall reduce these discharges through, at a minimum, public education activities (see NPDES Phase I MS4 Permit Section S5.C.11) and/or water conservation efforts. To avoid washing pollutants into the MS4, Permittees shall minimize the amount of street wash and dust control water used.
- Routine external building washdown that does not use detergents for buildings built or renovated before 1950 and after 1980. These discharges shall be reduced through, at a minimum, public education activities (see NPDES Phase I MS4 Permit Section S5.C.11) and water conservation efforts. Commercial, industrial, and multi-story residential structures constructed or renovated between the years 1950 and 1980 i.e., those most likely to have polychlorinated biphenyl (PCB)-containing building material, shall be assessed for PCB-containing materials consistent with How to Find and Address PCBs in Building Materials (Ecology, 2024, Publication No. 22-04-024), prior to routine building washdown to MS4. Structures confirmed or suspected to have PCB-containing materials shall not discharge washdown to the MS4. Single-family residential buildings are exempt from PCB assessment prior to building washdown, for the purposes of this section. Structures built between 1950-1980 and determined to be without PCB-containing materials may conduct routine building washdown (without detergents) as described above.

- Other non-stormwater discharges shall be in compliance with the requirements of a pollution prevention plan reviewed by the installation which addresses control of such discharges.

C. Illicit Discharge Detection, Investigation, and Elimination

The WMD has a program to detect, investigate, and eliminate illicit discharges.

Phase	Procedure
Detection	The WMD will conduct routine dry-weather screening of all outfalls at least once per year to check for illicit discharges. All storm drain inlets will be labeled with a "Dump No Waste" message.
Investigation	When an illicit discharge is detected or reported, an investigation will be initiated to trace the source of the discharge. This may include visual inspection, reviewing storm sewer maps, and sampling.
Elimination	Contractor Responsibility: If a contractor is identified as the source, they must terminate the discharge immediately, IAW contract terms. Internal Resolution: Discharges involving WMD personnel will be remediated internally by the responsible party with direction from Environmental (WMD) or the Base Civil Engineer (BCE/WAANG).
Enforcement	Contractor Non-Compliance: Failure to remediate in a timely manner will result in WMD officials executing the elimination, with all associated costs and damages billed to the contractor. Internal Personnel: Violations involving internal units or individuals will be addressed through mandatory educational programs regarding illicit discharge protocols.

D. Spill Prevention and Response

The WMD maintains Spill Response Plans for sites statewide to prevent and contain spills of hazardous materials. In the event of a spill, personnel will immediately notify the appropriate authorities by calling 253-355-4364 (WMD) or 253-753-0445 (WAANG) and take action to contain the spill and minimize its impact on the environment IAW with the spill policy, Unified Policy 10-04.

E. Storm Sewer System Mapping

The WMD maintains an up-to-date map of its MS4, showing the locations of all outfalls, receiving waters, and drainage areas. This map will be used to support IDDE activities and to track progress in eliminating illicit discharges.

F. Training and Education

The WMD will provide educational materials to the public about the hazards of illicit discharges and how to report them. All relevant personnel will receive annual training on IDDE, including how to identify and report illicit discharges. The link to refresher information is https://www.youtube.com/watch?v=gAiEDNYow8o.

G. Recordkeeping and Reporting

- The WMD maintains records of all IDDE activities, including inspections, investigations, and enforcement actions. An annual report summarizing these activities will be submitted to the Washington State Department of Ecology.
- To ensure compliance with federal, state, and local laws and regulations, this policy will be reviewed annually and revised as needed.