

**Illicit Discharges  
Standard Operating Procedures**

**Michigan State University  
Main Campus**

**Office of Environmental Health and Safety**

**April 2024**

Michigan State University (MSU) is committed to protecting the area's natural resources. To that end, MSU is charged with protecting the Red Cedar River and stopping any illicit discharges that flow to it. This SOP describes MSU's response to and correction of any non-stormwater discharges into MSU's storm sewer system. Any illicit discharge is unauthorized and violates Part 31 Rules. MSU may be required to report discharges to the Michigan Department of Environment, Great Lakes and Energy (EGLE) and may face potential fines and penalties for each occurrence.

The following definitions apply to this SOP:

- **Illicit Discharge:** Any discharge to, or seepage into, a Municipal Separate Storm Sewer System (MS4) that is not composed entirely of stormwater or uncontaminated groundwater except discharges pursuant to a National Pollutant Discharge Elimination System (NPDES) permit.
- **Illicit Connection:** A physical connection to an MS4 that primarily conveys non-stormwater discharges other than uncontaminated groundwater into the MS4; or a physical connection not authorized or permitted by the local authority, where a local authority requires authorization or a permit for physical connections.

### **Prohibited Discharges**

- (1) It is unlawful for any person to discharge, or cause to be discharged, to a stormwater drainage system or water body any substance or material, 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 or an authorized discharge. This prohibition includes the commencement, conducting, or continuance of any illicit discharge by any person to a stormwater drainage system or water body.
- (2) Any person discharging stormwater shall effectively prevent pollutants from being discharged with the stormwater, except in accordance with Best Management Practices (BMPs).
- (3) MSU is authorized to require dischargers to implement pollution prevention measures, using Stormwater Pollution Prevention Plans and BMPs, as determined necessary by MSU to prevent or reduce the discharge of pollutants to a stormwater drainage system or water body.
- (4) The discharge prohibitions of this section shall not apply to any non-stormwater discharge authorized under an NPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the US Environmental Protection Agency, provided the discharge is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the stormwater drainage system.

## **Prohibited Illicit Connections**

- (1) It is unlawful for any person to construct, use, maintain (or to allow the construction, use, maintenance or continued existence of) an illicit connection.
- (2) This prohibition expressly includes, without limitation, illicit connections made prior to the effective date of this SOP, and regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

The following non-stormwater discharges are permissible, but only if they do not result in a violation of State of Michigan water quality standards and provided that they are undertaken in compliance with any applicable or required BMPs:

- (1) Water supply line flushing.
- (2) Landscape or lawn irrigation runoff.
- (3) Rising groundwater.
- (4) Uncontaminated groundwater infiltration to storm drains.
- (5) Uncontaminated pumped groundwater.
- (6) Discharges from potable water sources.
- (7) Foundation drains.
- (8) Air conditioning condensate.
- (9) Irrigation water.
- (10) Springs.
- (11) Footing drains and basement sump pumps.
- (12) Residual street wash water.
- (13) Discharges or flows from emergency fire fighting activities.
- (14) Discharges specifically deemed in writing by MSU as being necessary to protect public health, welfare, and safety or the environment.

## **Storage of Hazardous or Toxic Materials in Drainageways**

It shall be unlawful for any person to store or stockpile, within a drainageway, any hazardous or toxic materials, unless adequate protection and/or containment has been provided to prevent any such materials from entering a stormwater drainage system or water body.

## **Inspection and Elimination of Illicit Discharges**

EHS and IPF are authorized by both the Office of Research and Innovation and the Office of the Vice President for Strategic Infrastructure Planning and Facilities to investigate any illicit discharges and to take appropriate measures to stop and eliminate the illicit discharge. Where an illicit discharge is found, the University will document the steps taken to eliminate the discharge and to assure that the discharge is in fact removed permanently. Where the discharge is due to improper housekeeping practices rather than due to a structural connection, periodic inspections of the facility will be performed by EHS. Unauthorized discharges shall be corrected as soon as possible, with interim measures implemented if necessary to stop the illicit discharge before a permanent solution is completed.

## **Mechanical Room Floor Drains**

1. Only groundwater that infiltrates the building is allowed to pass through the floor drains.
2. No dumping of any liquid into a floor drain is permitted. This includes waste water, cleaning products, oil based products, soapy water, or any other liquid.
3. Any liquid spills in a mechanical room should be cleaned up immediately. If a hazardous material is spilled, contact the EHS (355-0153) for assistance.
4. If a liquid is spilled, take measures to prevent it from reaching the floor drains in the room. These measures include covering the floor drain with a watertight magnetic cover, placing absorbent booms or pads around the floor drain, or otherwise diverting the liquid away from the drain.
5. If any liquid is spilled into a floor drain, immediately contact EHS (355-0153) and alert them where the spill was, what the material was, how much material spilled, and when the spill occurred so they can decide on further actions.
6. Only authorized individuals are allowed access to mechanical rooms.
7. Floor drains will be marked for easy identification in mechanical rooms.
8. Each mechanical room shall have a spill kit that consists of absorbent booms, pads, and floor dry material.

## **Parking and Service Lot Drains**

The following protocol is to be followed for all parking/service lot drains:

1. Only rainwater is allowed to pass through the drains.
2. No dumping of any liquid into a drain is permitted. This includes waste water, cleaning products, oil based products, soapy water, or any other liquid.

3. Any liquid spills in a parking/service lot location must be cleaned up immediately. If a hazardous material is spilled, contact EHS at (355-0153) for assistance.
4. If a liquid is spilled, take measures to prevent it from reaching the drains in the area. These measures include covering the floor drain with a watertight magnetic cover, placing absorbent booms or pads around the drain, or otherwise diverting the liquid away from the drain.
5. If any liquid is spilled into a floor drain, immediately contact the EHS office (355-0153) and alert them where the spill was, what the material was, how much material spilled, and when the spill occurred so they can decide on further actions.
6. Parking/service lot drains are marked for easy identification.

In summary, no dumping of any liquid into floor or parking lot drains is permitted, and precautions must be taken to prevent any spills from reaching a drain. For more information, please contact MSU Environmental Health and Safety at 517-432-5542.