

INTRODUCTION
ILLICIT CONNECTION/ILLICIT DISCHARGE ELIMINATION PROGRAM
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The municipal storm water National Pollutant Discharge Elimination System (NPDES) Permit issued to Los Angeles County and 85 cities by the Los Angeles Regional Water Quality Control Board (RWQCB) on December 13, 2001 contains a requirement for all Permittees to develop and implement an Illicit Connection/Illicit Discharge Elimination Program.

The purpose of this manual is to provide for a systematic and accessible informational source to communicate the City's Illicit Connection/Illicit Discharge Elimination Program to its employees, contractors and agents. Statements contained within this manual are intended to provide for consistent implementation of these procedures. All employees, contractors and agents of the City are governed by the procedures set forth, unless otherwise stipulated by a specific policy or written statement.

This manual should be used as a consultative material, consistent with the City's mission and objectives. Employees should treat this manual as general guidelines for the implementation of the City's NPDES Illicit Connection/Illicit Discharge Elimination Program, since it may not contain all procedures and practices, nor all interpretations, amendments additions or deletions of all other standard operating procedures that may have previously been established for other purposes. It is recognized that this manual is a "living document," and that the procedures contained within this manual may be changed, or modified depending upon the particular circumstances, as the need may arise.

Supervisory personnel are responsible for communicating this information to their employees, contractors and agents. These communications shall include an orientation for new personnel and ongoing discussions with employees as to the general information contained herein. Employees are responsible for abiding by these procedures and for seeking assistance from their supervisors in understanding the meaning and intent of the program.

The Chief of General Services and Public Works is responsible for the preparation and publication of this written program and any approved revisions.

Procedures contained within this manual shall supercede any previous publications governing the same or similar matters. Any questions concerning the currency, interpretation or application of an NPDES Illicit Connection/Illicit Discharge Elimination Program procedure shall be referred to the NPDES Coordinator.

(DATE)

TO: All Department Heads

FROM: Louis N. Garcia
City Manager

SUBJECT: National Pollutant Discharge Elimination System (NPDES) Program
Mission Statement

It is the administrative policy of the City that a fundamental service provided to the community is the protection of the area's water resources. To this end, every reasonable effort will be made in the interest of pollution prevention and resource conservation.

The City will endeavor to conduct its operations, and to educate others within the community on how they may also operate, in a manner that ensures, to the maximum extent practicable, that all activities in the city, both public and private are environmentally safe and healthful.

It is our belief that such activities as illicit connections, illicit discharges, various maintenance activities and related unconscious actions may damage the area's environment and natural water resources, causing needless suffering, inconvenience and expense to natural habitats and the community at-large.

We believe that most storm water transported pollution can be prevented at its source by taking common sense precautions.

Because of the large number of activities in progress at one time, the varied nature of the work, and the widespread location of operations, we must "formalize" our NPDES Program, utilizing written reports and records to achieve the maximum use and effectiveness of pollution control information.

To coordinate the City's NPDES Program, the Mike Shay, Civil Engineer, will act as the NPDES Coordinator. The overall effectiveness of the City's Program is the NPDES Coordinator's responsibility.

The responsibility for pollution control in each department and division remains with the department head and supervisor(s). Department heads may delegate to a department Pollution Control Coordinator, who through their department head, institutes a program for compliance with the procedures contained within this manual. Should a department head designate a Pollution Control Coordinator, the department head will be responsible for outlining his/her specific responsibilities in writing.

In this overall effort to control potential pollutants at their source and to protect the area's natural resources, the City can fulfill its obligations as a servicing agency. I am confident that the City's NPDES Program will be successful and expect your fullest cooperation toward that end.

**Department Heads’
POLLUTION CONTROL RESPONSIBILITIES**

Purpose

The Department heads are charged with implementing the Illicit Connection/Illicit Discharge Elimination Program (“the Program”) as directed by the City Manager or designee thereof. The following are the general responsibilities of the Department heads:

Policy

1. **Management of the Program.** The Department heads are responsible for the management of the Program as it applies to their area(s) of responsibility. It is also expected that action will be taken to supplement the City’s basic program according to the needs of the Department. The Department heads must hold supervisors responsible and accountable for pollution control compliance in their area(s) of responsibility.
2. **Basic Supervisor Training.** The Department heads are responsible for ensuring that all current and future appointed supervisors receive basic training in the contents of this manual. Ideally, such training should be completed at the time the supervisor assumes their responsibilities. Refresher training shall be conducted on a routine, on-going basis.
3. **Pollution Control Meetings with Supervisors.** The Department heads will establish and conduct a program of regular meetings with their supervisors to discuss the department’s compliance with the Program. As needed, the meeting should entail such topics as inspection findings, observations, procedural problems, and similar matters. This responsibility may be shared with Assistant Department heads.
4. **Illicit Connection/Illicit Discharge Investigation.** The Department heads will review all reports of illicit connections/illicit discharges or Program non-compliance activities experienced by their department and direct whatever action is reasonably necessary to prevent recurrence. A follow-up procedure must be adopted to ensure that ordered corrective action is completed.

5. **Development of Connection and Discharge Procedures.** The Department heads will establish and implement departmental storm drain and sanitary sewer connection and discharge policies and procedures. Such policies and procedures may supplement, but may not conflict with, the procedures contained within this manual. All policies and procedures must be in writing and approved by the NPDES Coordinator prior to their implementation.

6. **Federal, State and Local Codes.** The Department heads must know the Federal, State and Local Codes applicable to their department's pollution control operations and responsibilities and train supervisors accordingly. The City's NPDES Coordinator and environmental consultant are available to assist all Department heads in this area.

Supervisors' POLLUTION CONTROL RESPONSIBILITIES

The actions of the City's front-line supervisors are of critical importance to the success of the Program. If pollution is to be prevented, employees must be trained to perform their duties in an environmentally sound manner and to recognize when others may not. They should be reminded of their environmental obligations during regularly scheduled safety meetings. Their work areas and job sites should be inspected regularly for non-compliance with the Program. Additionally, all field personnel must be observant while conducting their routine duties in order to identify illicit discharges that they may come upon. When discovered, illicit connections and discharges, and other forms of non-compliance with the Program, are expected to be investigated to determine causes and corrective actions.

The attitude of the Supervisor toward the identification and reporting of environmentally unsound operations has a substantial impact on the attitudes of employees. The supervisor represents management of employees. Therefore, what is said and done by the supervisor, is often taken as a reflection of City management's views. To act indifferent concerning illicit connection and discharge procedures will convey the idea that management is indifferent to the protection of the environment. Conversely, when the same activities are performed with a high level of concern regarding illicit connections/discharges, the employees are more likely to act accordingly. The result is a cleaner environment for all.

Purpose

The Supervisor is charged with ensuring that employees maintain their work areas and job sites and perform their assigned duties in a manner consistent with the procedures contained within this manual and that they report observed illicit connections/discharges as required by the Program. To achieve this goal, the supervisor will implement the Program's provisions as directed by upper management.

Policy

1. **Responsibility for Assigned Personnel.** The Supervisor is responsible for compliance with the provisions of this manual by all personnel regularly

assigned to them. Supervisors, therefore, have authorization to take any reasonable action required to ensure all such employees conduct themselves in compliance with the provisions of this manual.

2. **Responsibility for Non-assigned Personnel.** Supervisors also share responsibility for personnel of other departments, contractors and other agents of the City, who may be working in their area. The Supervisor is to become acquainted with the nature of their work, and ascertain that they take all reasonable precautions to comply with the provisions of this manual.
3. **Agency Illicit Connection/Discharge Investigation.** The Supervisor will investigate illicit connections/discharges that they observe or are brought to their attention, and shall take all reasonable steps necessary to correct such situations. Any incidents that are beyond their authority to correct shall be immediately reported to higher supervision. All such investigations are to be reported on the appropriate form in accordance with the provisions of this manual.
4. **Private Property Illicit Connection/Discharge Investigation.** Supervisors have responsibility for reporting all private property illicit connections/discharges that they observe or are brought to their attention in accordance with the procedures established by this manual.
5. **Employee Basic Training.** Supervisors are responsible for ensuring that their assigned personnel know the City's illicit connections/discharges policies and procedures, definitions of what constitutes an illicit connection or discharge, and the proper reporting procedures for the same. They are responsible for the initial illicit connection/discharge program orientation of all current and future assigned employees.
6. **Federal, State and Local Codes.** Supervisors are responsible for knowing the applicable Federal, State and Local Code connection and discharge requirements for all activities performed under their jurisdiction. The City's NPDES consultant is available to assist in this area.

**Employees’
POLLUTION CONTROL RESPONSIBILITIES**

Purpose

Employees are charged with complying with the provisions of the City’s NPDES Illicit Connection/Illicit Discharge Elimination Program as directed by management through the supervisors.

Policy

1. **Inspection of Worksite.** Employees are responsible for the self-inspection of their worksite to ensure that it is maintained in a condition of compliance with the provisions of this manual. Any and all deficiencies are to be immediately reported to their supervisor.
2. **Pollution Control Policies and Procedures.** The employee is responsible for adhering to all properly established pollution control policies and procedures and for complying with all reasonable corrective instructions issued by their supervisor or other proper authority.
3. **Report of Illicit Connections/Discharges or Pollution Control Concern.** The employee shall be responsible for reporting all illicit discharges that they observe or are made aware of, regardless of whether it is a City, industrial, commercial or residential discharge, to their supervisor.

ILLICIT CONNECTION/ILLICIT DISCHARGE ELIMINATION PROCEDURES

Introduction

The City's storm drain system is designed to collect and convey surface discharges and runoff to receiving waters during storms in order to prevent flooding. Illegal connections to this system, or illegal discharges to City streets which ultimately flow into the system, can allow for materials to be transported directly to waterways and the ocean, resulting in significant harm to the environment. The same scenario exists for illegal discharges through legal connections and for cross-connections of sewer systems to the storm drain system.

For these reasons, it is necessary to ensure that suspected illegal connections and/or discharges to either system are properly investigated and eliminated.

Purpose

To identify and eliminate illicit connections and illicit discharges to the City's street, storm drain and sanitary sewer systems.

Scope

These operational procedures are applicable for all employees, contractors, and agents of the City.

ILLICIT CONNECTION/ILLICIT DISCHARGE PROGRAM DEFINITIONS

Illicit Connection

1. Any man-made conveyance that is connected to the street or storm drain system without a permit.
2. Examples would be channels, pipelines, conduits, swales, inlets, and outlets that are **directly** connected to the storm drain system, or are constructed in such a manner as to direct their flows to City streets.

Illicit Discharge

1. Any non-storm water discharge to the storm drain system, except those that are covered by a separate individual or general NPDES permit, or fall within one of the following categories.
 - A. Natural flow
 - 1.) Natural springs and rising ground water;
 - 2.) Flows from riparian habitats or wetlands;
 - 3.) Stream diversions permitted by the State Board; and
 - 4.) Uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)].
 - B. Flows from emergency fire fighting activity.
 - C. Flows incidental to urban activities
 - 1.) Reclaimed and potable landscape irrigation runoff;

- 2.) Potable drinking water supply and distribution system releases;
 - 3.) Drains for foundations, footings, and crawl spaces;
 - 4.) Air conditioning condensate;
 - 5.) Dechlorinated/debrominated swimming pool discharges;
 - 6.) Dewatering of lakes and decorative fountains;
 - 7.) Non-commercial car washing by residents or by non-profit organizations; and
 - 8.) Sidewalk rinsing.
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3. The Chief of General Services and Public Works may recommend the regulation of any listed conditionally-exempted activity to the City Council if, in his sole discretion, the activity is identified as being a significant source of pollutants to receiving waters.
 4. If any listed exempt or conditionally exempt discharge is creating conditions resulting in a public nuisance, the Chief of General Services and Public Works may prohibit or restrict the discharge through the City's nuisance abatement process.

ILLICIT CONNECTION/ILLICIT DISCHARGE RESPONSE PROCEDURES

General Response Procedures

An illicit discharge response entails four fundamental phases, which are: **CLASSIFY, CONTAIN, CONTROL and CLEANUP.**

The first personnel on scene are to **classify** whether the discharge is hazardous, non-hazardous, or unknown (**Do not touch or approach any potentially hazardous material**). Hazardous and unknown discharges are referred to the City's Fire Department and/or the City's environmental cleanup contractor. Non-hazardous discharges are handled by City personnel, with the assistance of the City's environmental consultant.

The second phase is to **contain** the spill. For some forms of liquid discharges, this may entail the use of sand or soil dikes, sand bags, or plugging the outlet pipe of a catch basin. For other types of spills this may simply entail closing the roadway to prevent material from being tracked or otherwise dispersed by vehicular traffic.

The third phase of the response is to bring the discharge under **control**. For sewer spills this means clearing the line blockage or bypassing the line. For other types of discharges, this may entail sanding or placing absorbent on a material, or simply instructing someone on private property to stop their discharge.

The fourth and final step of the response is **cleanup**. For liquid spills this may require washing down and disinfecting all surfaces touched by the spill, and removing and properly disposing of all contaminated wash down. Other types of discharges will have their own unique methods of cleanup.

Initial Discharge Response Procedures

1. The Public Works Inspector or designee thereof shall be immediately dispatched to the site.
2. If the discharge may be hazardous or unknown, proceed to Step 3. If the discharge is determined to be non-hazardous, proceed to Step 5.
3. The Public Works Inspector shall immediately retreat to a safe location (i.e. upstream and upwind), blocking the roadway, if necessary, to protect the public. If possible, given the topography and prevailing conditions that exist at the time, the Public Works Inspector shall call for assistance to

block the roadway on the other side of the discharge to isolate the area from the public.

4. The Public Works Inspector will then notify the Los Angeles County Fire Department of the incident. Upon receiving confirmation that the Fire Department will be responding, the Public Works Inspector is to stand-by and await the Fire Department's arrival to provide any assistance that may reasonably be requested.
5. If the spill is determined to be non-hazardous, proceed with containment, control and cleanup operations consistent with the procedures specified within the Sewage Spill Response and Streets and Road Maintenance sections of the Public Agency manual and the following flowchart.

ILLICIT CONNECTION/ILLICIT DISCHARGE REPORTING PROCEDURES

Working Hours Reporting Procedures

1. Suspected illicit connections/illicit discharges are to be reported through the City's Hotline Number (310) 318-0661.
2. Personnel receiving the call shall complete an Illicit Connection/Illicit Discharge Program Reporting and Response Form (Form ICID-1) and shall immediately contact the NPDES Coordinator for initial response.
3. After determining whether the situation entails hazardous, non-hazardous or unknown material(s), and taking all reasonable action immediately necessary for his/her own safety and the safety of the general public, the Public Works Inspector will report back to the personnel that received the original call to advise them of the nature of the problem.
4. The person that received the original call shall record the information provided by the Public Works Inspector onto Form ICID-1 and shall then forward the form to the Chief of General Services and Public Works for review.
5. In all cases, a copy of the completed Form ICID-1 shall be forwarded to the City's environmental consultant for follow-up investigation and enforcement.

(The existing Hazmat reporting form may be used in lieu of an ICID-1 form)

After Hours Reporting Procedures

1. Suspected illicit connections/illicit discharges are received either through the Police Department's 911 Dispatch, or through calls made to the Police Department's Complaint Desk (310) 379-5416 or to the City's Engineering Division.
2. Police Dispatch will dispatch a unit to perform an initial response and to determine:

- a. if the material involved is hazardous, unknown or non-hazardous.
 - b. if the situation requires immediate attention.
3. Incidents involving hazardous or unknown materials will result in County Fire/Hazmat units being responded to the location. In addition, the Police Department's Watch Commander shall notify the NPDES Coordinator that a Hazmat incident has occurred. This notification may be made on the next working day.
4. Upon receiving notification that a Hazmat incident occurred, the NPDES Coordinator shall be responsible for obtaining all available information related to the incident from County Fire/Hazmat and for forwarding the same to the City's environmental consultant for follow-up investigation and enforcement.
5. Incidents involving non-hazardous materials will be referred to City personnel, as follows:
 - a. If immediate action is needed, Public Works Department standby personnel will be contacted by Police Dispatch using the City's Emergency Call List. The staff person contacted is responsible for filing a completed Form ICID-1 in this event.
 - b. If immediate action is not needed, Police Dispatch will contact the City's Hotline on the next working day.
6. City response procedures to either method of notification shall be consistent with the procedures contained within this manual.

ILLICIT CONNECTION/ILLICIT DISCHARGE ENFORCEMENT PROCEDURES

Limited Violation

1. This would be defined as a small-scale, one-time violation of a limited scale. Examples would be:
 - a. A resident sweeping grass and leaves into the street
 - b. A contractor working on a residential property leaving dirt piles uncovered with impending rain.
2. Issue a verbal warning, provide a “friendly reminder,” and ensure that the matter is corrected.
3. Complete a Form ICID-1 and submit the completed form to the NPDES Coordinator for forwarding to the City’s environmental consultant for inclusion in routine summary reports.
4. If a violation occurs in a residential area, a “blanket mailer” may be sent to suspected source(s) and neighboring addresses as additional education.

Notable Violation

1. This would be defined as a connection or discharge that could be eliminated by the responsible party without major effort. Examples would be:
 - a. A contractor not utilizing the appropriate Best Management Practices (BMPs) for work being performed.
 - b. A business improperly storing materials where they will be exposed to rainfall.

2. Issue a Field Notice to the responsible party and establish a reasonable time period for compliance.
3. A copy of the Field Notice is forwarded to the City's environmental consultant for follow-up investigation and assurance that the matter has been rectified.

Major Violation

1. This would be defined as a connection or discharge which has not or could not be eliminated by the responsible party, which may have required the emergency or priority response of City or County forces, or is an on-going problem. Examples of this would be:
 - a. Major material discharges within the public right-of-way.
 - b. Illegal connections to the storm drain system (i.e. street, catch basin, or discharge to the beach or ocean).
 - c. Storage of material in such a manner that rainfall could wash pollutants into the street and storm drain system.
2. City response personnel complete Form ICID-1 and forward the same to the City's environmental consultant.
3. The City's environmental consultant conducts a site investigation and issues a First Notice of Violation and prescribes corrective action to be taken and a reasonable time period for compliance.
4. If necessary, the consultant issues Second and Third notices. The Third Notice includes an admonishment that failure to comply will result in legal action being taken.
5. If necessary, the consultant transmits a Case File, which shall include copies of all reports, investigations and letters to the NPDES Coordinator.
6. The NPDES Coordinator forwards the Case File to the City Attorney for legal remedy.
7. For serious violations, the Chief of General Services and Public Works at his/her sole discretion, may authorize proceeding directly from Step 2 to Step 6.