ILLICIT CONNECTIONS & ILLEGAL DISCHARGES ELIMINATION PROGRAM

for the

Municipal Separate Storm Sewer System (MS4)

within the

City of Rolling Hills

March 2004

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Attachment A: Chapter 8.32 of the Rolling Hills Municipal Code

On December 13, 2001, the Los Angeles Regional Water Quality Control Board (the Regional Board) reissued the National Pollutant Discharge Elimination System (NPDES) Municipal Storm Water permit (Permit) to Los Angeles County municipalities (Permittees). The Permit requires the Permittees to document how the Illicit Connections and Illicit Discharges Elimination (IC/ID) Program is being implemented within each jurisdiction. The IC/ID Program is one of five Programs that comprise the Storm Water Quality Management Program (SQMP) being implemented in the City of Rolling Hills—these are:

- Public Information and Participation
- Development Planning
- Development Construction
- Public Agency Activities, and
- Illicit Connections and Illicit Discharges Elimination.

These five programs have been integrated within the City of Rolling Hills to ensure that effective implementation of the permit requirements is accomplished. (A sixth program, the Industrial/Commercial Facilities Control Program, is not implemented in the City of Rolling Hills since there is no industrially or commercially zoned property within the City.)

1. Background

Part 4.G.1. (a) of the Permit states that:

> *Each Permittee must develop an Implementation Program which specifies how each Permittee is implementing the revisions to* ***the IC/ID Program of the SQMP****. This Implementation Program must be documented, and available for review and approval by the Regional Board Executive Officer, upon request.*

This IC/ID Elimination Program document has been developed to meet this permit requirement. The County revised the six Model Programs in July 2002 to incorporate additional provisions established in the current third term Municipal NPDES Permit, Order No. 01-182. The City of Rolling Hills has reviewed the revised IC/ID Model Program prepared by the County as well as the current Permit requirements and has developed this IC/ID Elimination Program Manual to document its internal

procedures and policies in order to demonstrate full compliance with the IC/ID provisions of the Permit.

The City of Rolling Hills is a private, entirely residential rural community consisting of large parcels with single-story ranch style residences. The streets are private and deeded as easements to the Rolling Hills Community Association who maintains them. There are no sidewalks, curbed streets or alleys. There are nine storm drains within the City that are owned and maintained by the County of Los Angeles Department of Public Works. The remaining storm drains are rural, privately owned and maintained by the Rolling Hills Community Association (RHCA). Hence the City of Rolling Hills neither owns nor operates the storm drain system and accordingly the City's direct responsibility for implementing the IC/ID Elimination Program is limited. Nevertheless, in order to provide as complete an explanation of the implementation of this program within the City as possible, this document endeavors to describe the interaction and responsibilities of various jurisdictions over the IC/ID Elimination Program. The City's role is largely one of education and facilitation.

1.1 CITY SERVICES STRUCTURE

The City of Rolling Hills is a contract city and accordingly many public works and engineering functions are managed via contracts with the County of Los Angeles or with private contractors. The City employs two administrative staff, City Manager and Planning Director; two support staff, Deputy City Clerk and Receptionist; one part-time Finance Director and one part-time Finance Clerk. The Planning Director is responsible for the implementation of the storm water program (NPDES).

The City contracts for significant public works services through Los Angeles County Department of Public Works as well as through private contracts. Those services contracted through Los Angeles County Department of Public Works include:

- Building & Safety services for all areas of the City
- Engineering

Privately contracted municipal services include:

- Solid Waste Collection and Curbside Recycling
- Manure recycling contracts

Sanitary sewers within the City are owned and operated by Los Angeles County Sanitation District.

1.2 IC/ID PERMIT REQUIREMENTS

The NPDES Permit requires the elimination of all illicit connections and discharges to the storm drain system and documentation, tracking and reporting of such cases in accordance with elements and performance measures specified in the Permit. These elements and performance measures and the responsibility for these elements are summarized in Table 1.1.

Table 1-1 Illicit Connections and Illicit Discharge Elimination Performance Measures		
Permit Section	**Requirement**	**Deadline: *Responsibility***
4.G.1.a	Develop an Implementation Program which specifies how each Permittee is implementing revisions to the IC/ID Program of the SQMP.	Implementation Program must be documented, and available for review and approval by the Regional Board Executive Officer, upon request: *Complete*
4.G.1.b	Develop and maintain a listing of all permitted connections to the storm drain system.	February 03, 2003: *This function is performed by the County of Los Angeles.*
4.G.1.b	Map, at a scale and in a format specified by the Principal Permittee, all illicit connections and discharges on the baseline maps and transmit this information to the Principal Permittee.	*This is tracked by the County of Los Angeles Department of Public Works.*
4.G.1.c	Train all targeted employees who are responsible for the identification, investigation, termination, cleanup, and reporting of illicit connections and illicit discharges. Conduct refresher training annually.	For Permittees with a population of less than 250,000 (2000 U.S. Census), training shall be completed by August 01, 2002.: *City conducted the initial training by the deadline and conducts refresher training annually.*
4.G.2.a.1.i	Field screen open channels in the storm drain system for illicit connections.	February 03, 2003: *The City neither owns nor operates open channels. County-owned channels are screened by the County.*
4.G.2.a.1.ii	Field screen underground pipes in priority areas of the storm drain system for illicit connections.	February 01, 2005: *The City neither owns nor operates underground storm drains. County-owned pipes will be screened by the County.*
4.G.2.a.1.iii	Field screen underground pipes with a diameter of 36 inches or greater in the storm drain system for illicit connections.	December 12, 2006: *The City neither owns nor operates underground storm drains. County-owned pipes will be screened by the County.*
4.G.2.a.1	Report on the location and length of open channels or underground pipes that have been screened, and on the status of suspected, confirmed, and terminated illicit connections.	*The City neither owns nor operates underground storm drains. County-owned pipes will be screened by the County.*

Table 1-1 Illicit Connections and Illicit Discharge Elimination Performance Measures		
Permit Section	**Requirement**	**Deadline: *Responsibility***
4.G.2.a.2	Complete a review of all permitted connections to the storm drain system, to confirm compliance with Part 1 of the Permit (Discharge Prohibition).	December 12, 2006: *The City neither owns nor operates underground storm drains. County-authorized permits will be reviewed by the County.*
4.G.2.b.1	Initiate an investigation of reported suspected illicit connections to the storm drain system.	*Complaints regarding illicit connections are referred within 24-hours to the County for investigation.*
4.G.2.b.2	Terminate illicit connections to the storm drain system.	Within 180 days from confirmation of the illicit nature of the storm drain connection: *This is the responsibility of Los Angeles County Department of Public Works.*
4.G.3.a.	Respond to suspected illicit discharge with activities to abate, contain and clean up illicit discharges, including hazardous substances.	Within one business day of discovery or report: *This function is performed by the Los Angeles County Fire Department and Department of Public Works.*
4.G.3.b.	Investigate illicit discharges and take enforcement action as appropriate.	*Inspection is performed by City staff immediately. Investigation and enforcement are performed by the Los Angeles County Fire Department and Department of Public Works as appropriate.*
4.F.1.a.1	Investigate complaints regarding sanitary sewer system overflows within City	*Complaints are referred to LA County DPW and LA County Department of Health Services within 24 hours.*
4.F.1.a.2	Response to overflows for purposes of containment	*This function is performed by the Los Angeles County Fire Department and Department of Public Works.*
4.F.1.a.3	Notify appropriate sewer and public health agencies when a sewer overflows to the MS4	*Complaints are referred to LA County DPW and LA County Department of Health Services within 24 hours.*

1.3 STORM DRAIN SYSTEM

There are nine storm drains within the City that are owned and maintained by the County of Los Angeles Department of Public Works. The remaining storm drains are rural, privately owned and maintained by the Rolling Hills Community Association (RHCA). Hence the City of Rolling Hills neither owns nor operates the storm drain system and accordingly the City's direct responsibility for implementing the IC/ID Elimination Program is limited to prompt referral of complaints to the County.

1.4 EMPLOYEE TRAINING

The City's Planning Director is the key employee responsible for overseeing the IC/ID Program. The Planning Director meets at least quarterly with the City's Storm water/NPDES Consultant for the purpose of:

- training in updates to the MS4 NPDES permit requirements and available resources for implementing this program
- tracking progress of completion of regulatory requirements under the MS4 NPDES permit
- coordinating the annual reporting of IC/ID program accomplishments for the NPDES Annual Report

In addition to this internal training, the Planning Director seeks opportunities to attend conferences with peers from other municipalities and takes advantage of training opportunities available from professional organizations. City employees responsible for receiving public complaints either by telephone or at the public counter receive annual training in procedures for handling reports of potential IC/ID occurrences.

2. Procedures

2.1 PROHIBITED ACTIVITIES

Legal authority for the City's implementation of the IC/ID program is based upon the City of Rolling Hills Storm Water and Urban Runoff Pollution Control Ordinance, Chapter 8.32 of the Rolling Hills Municipal Code. A copy of the ordinance is provided as Attachment A.

2.2 PUBLIC REPORTING

Public reports of possible illegal discharges are sometimes received by personnel at the City of Rolling Hills. Calls received after hours are directed to call 911 for emergencies, in addition a listing of emergency telephone numbers is also provided on the recording.

The telephone operator obtains all relevant information available regarding the potential discharge/overflow including:

- Time and date call was received
- Specific location
- Description of problem
- Time possible discharge/overflow was noticed
- Callers name and telephone number
- Observations of the caller (e.g., odor, duration, location on property)
- Other relevant information that will enable the responding investigator or emergency response team to quickly locate, e.g., nearest cross street.

All potential discharges/overflows brought to the City's attention are immediately directed to the attention of the appropriate agency (LA County Department of Public Works or the LA County Fire Station within the City for emergency response), and inspection is performed by City staff immediately.

The City has an educational outreach program for the general public that includes contact information for reporting potential illicit discharges as well as information on what constitutes an illegal discharge. A variety of media are employed in this public education effort:

- The City publicizes the Clean LA Hotline number on its print and electronic materials
- The City distributes brochures at the public counter on a variety of pollution prevention issues
- At a minimum a quarterly newsletter is distributed to residents discussing Best Management Practices to prevent discharges
- City has an active recycling program for yard waste and manure
- The City cooperates with sister watershed cities to place public service announcements in local media outlets that target pollutants of concern within the watershed.
- The City participates in the County-wide Public Information Participation Program of the SQMP.

2.3 INVESTIGATION

The owner and/or contractors are directed to immediately correct any violations. The County inspector explains the best method for correcting/cleaning up a discharge. A re-inspection of the site is scheduled within a few days.

2.4 CODE ENFORCEMENT PROCEDURES

A verbal and written notice is given to the project's superintendent alerting him/her of the observed deficiencies. A follow up inspection is conducted to see that the violation has been corrected. If the violation has not been corrected, then no other approvals are granted (e.g., no rough grading approval) effectively shutting down the project until corrective actions are taken. The Building Official may ask the District Attorney's office to file charges against a property owner who knowingly continues to violate NPDES mandates.

3. Illicit Connection Elimination

The City of Rolling Hills does not own or operate any portion of the municipal separate storm sewer system (MS4) and therefore does not regulate connections to the system, whether legal or illicit. Permitting of connections to the MS4 is strictly within the purview of the Los Angeles County Department of Public Works and/or Building and Safety Department for that portion of the MS4 owned and operated by the County of Los Angeles within the City of Rolling Hills.

4. Illicit Discharge Elimination

Information regarding the potential presence of illegal discharges is gathered from a variety of sources using both active and receptive methods:

- public complaints
- inspections
- reports from Building & Safety Departments

Once information regarding potential illegal discharges is obtained, the appropriate spill response and corrective actions must be initiated. The City in cooperation with the County Department of Public Works responds within one business day of discovery or report of suspected illicit discharges. Illicit discharges are investigated as soon as practicable following containment and cleanup activities. Responsible parties are noticed to immediately cease unlawful discharges. Appropriate enforcement actions are taken.

4.1 PUBLIC REPORTS/COMPLAINTS

When a complaint is received, staff and County inspector immediately visit the site. The Fire Department is notified if a hazardous material spill is suspected. The City is a gated community and any non-resident vehicles entering the City must identify the destination address. The gate guard maintains a record of all non-resident vehicles entering the City and from this information it is very easy for City staff to identify sources of discharges.

4.2 INSPECTIONS

The City contracts with the Los Angeles County Building and Safety and Public Works Departments for storm water run-off prevention implementation during plan-checking, construction, inspection and post construction stages. In cases of complaints regarding construction projects, the City's Planning Director often accompanies the LA County Building Inspector on the inspection. County personnel under contract with the City conduct occasional weekend inspections to identify any illegal grading, dumping or construction. The City maintains records of these illegal activities and immediately notifies the property owner to cease violation.

4.3 SPILL RESPONSE PROCEDURES

It is the responsibility of the first personnel who arrive at the site of an illicit discharge to protect the health and safety of the public by:

- notifying appropriate agencies of actionable conditions
- establishing perimeters and control zones with cones, barricades, vehicles or terrain, and
- mitigating the impact of the discharge to the extent possible while protecting safety of personnel.

The local Los Angeles County Fire Station within the City has the necessary materials and personnel to implement such measures.

4.3.1 Notification of appropriate agencies/personnel

Notification of appropriate agencies will involve one of three general categories of spill events:

- Discharges involving sanitary sewer system or septic system require notification of the Los Angeles County Department of Public Works and the Los Angeles County Department of Health Services.
- Discharges involving potentially hazardous materials or wastes require immediate notification of the Los Angeles County Fire Department (Haz Mat Team).
- All other categories of discharges are referred to the County Public Works Department for further direction

4.4 SANITARY SEWER SYSTEM OVERFLOW RESPONSE

The majority of residents in the City have on-site sewage treatment systems, i.e., septic systems. A few homes on the west side of the City are connected to County-owned sewers. If there is imminent danger to the public health or a release to the storm drain system or stream, the LA County Fire Station within the City has the capability to respond with sand bags until the Los Angeles County Department of Public Works arrives on the scene.

4.4.1 Initial Measures for Containment

Under no circumstances shall City personnel enter into an underground storm drain, sanitary sewer or culvert. Specialized training and equipment are required to make confined space entries. Sanitary sewers and storm sewers may contain trapped gases that can cause loss of life due to toxicity, or

asphyxiation from insufficient oxygen due to displacement by sewer gases. Measures which may be taken to contain overflowing sewage may include:

- Determine the immediate destination of the overflow, e.g. storm drain, street, stream, etc.
- Identify and secure necessary materials and equipment to contain or isolate the overflow if possible
- Take immediate steps to contain the overflow, e.g. block or sandbag storm drains, divert into downstream sanitary sewer manhole, etc.
- Secure the overflow site to prevent contact by members of the public

4.4.2 Information to be Gathered On-Scene

Once initial measures have been taken, City personnel on-scene should attempt to gather additional information from those at the scene or in adjacent residences, including:

- Date/time of onset of the overflow or discharge
- Estimate of quantity of overflow or discharge
- Determination whether or not the overflow or discharge reached the storm drain or surface water
- Cause of overflow or discharge
- Location of overflow or discharge: LACSD sewer, private lateral, septic system

This information is to be provided to the Los Angeles County Department of Public Works or Health Services for proper documentation and reporting.

4.5 ABATEMENT AND CLEANUP OF ILLEGAL DISCHARGES

It is the legal and financial responsibility of the property owner to clean up and remove residues of an illegal discharge remaining on the property and in the storm drain system. Discharges associated with construction activity from construction sites subject to the Statewide General Stormwater Permit for

Construction Activities fall under the oversight of the LA County Building & Safety Department that issued the building/grading permit and the oversight of the Los Angeles Regional Water Quality Control Board. Discharges/overflows from a private septic system or the sanitary sewer system are subject to oversight by the Los Angeles County Department of Health Services to ensure that potential threats to public health from such discharges have been eliminated. The City staff follow-up to ensure that clean-up action is completed in a complete and timely manner.

4.6 SANITARY SEWER SYSTEM OVERFLOW PREVENTION AND ABATEMENT

(Not applicable in the City of Rolling Hills--applicable only to cities that own or operate the sanitary sewer system)

5. References

American Public Works Association, January 1999. Preparing Sewer Overflow Response Plans: A Guidebook for Local Governments. ISBN # 0-917084-76-4.

California Regional Water Quality Control Board—Los Angeles, December 2001. Order No. 01-182, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles and the Incorporated Cities therein, Except the City of Long Beach.

Attachment A: Chapter 8.32 of the Rolling Hills Municipal Code