

**CITY OF MONROVIA
DEPARTMENT OF PUBLIC WORKS**

DATE: August 20, 2002
TO: File
FROM: Louis A. Celaya, Management Analyst II
SUBJECT: **Illicit Discharge/Illicit Connection Program
2001 NPDES Permit**



This memorandum will document procedures for the Illicit Discharge and Illicit Connection Program, as reference in the revised 2001 Model Program required under the LA Co. Municipal Storm Water NPDES Permit (Order No. 01-182; NPDES Permit No. CAS0004001).

PROGRAM OBJECTIVES

- Effectively prohibit non-stormwater discharges
- Reduce the discharge of pollutants to the maximum extent practicable (MEP)
- Detect and Remove Illicit Discharges and Improper Disposal into the MS4
- Eliminate illegal connections to the maximum extent practicable.

ILLICIT DISCHARGES (IDs)

“Illicit Discharge: Any discharge to the storm drain system that is prohibited under local, state or federal statutes, ordinances (No. 97-04), codes or regulations. The term illicit discharge includes all non-storm water discharges except discharges pursuant to Order No. 01-182; NPDES Permit No. CAS0004001, discharges that are identified in Part I, ‘Discharge Prohibitions’ of the permit, and discharges authorized by the Regional Board Executive Officer.”

“Illicit Disposal: Any disposal, either intentionally or unintentionally, of material(s) or waste(s) that can pollute storm water.”

Receiving ID Reports

Reports of IDs will be forwarded to the Management Analyst. The following information should be collected: 1) Date, 2) Time, 3) Discharge Address, 4) Discharge Material Reported, 5) Reporting Party. The Illicit Discharge/Connection Report Form should be used for initial report information collection. The form can be located on the Public Works Datafiles, under Department Forms – “Illicit Discharge Report-Response Form”.

Investigations

IDs will be handled by the Public Works Department, NPDES Coordinator (Management Analyst). Investigations shall take place as soon as practicable. Depending on the location of the spill and the type of material, the appropriate Department should be notified. This will consist of:

- 1) Public Works for storm drain maintenance, if the spill reaches the storm drain system
- 2) Public Works for street and road maintenance, if the spill is in the public right-of-ways
- 3) Public Works for Sewer system maintenance, if the material is from the sewage system
- 4) Public Works and/or Fire Department for Industrial waste inspection, if the material is from industrial facilities
- 5) Public Works and/or Fire Departments if the material may be hazardous

These departments will determine the nature of the material and the extent of the spill. If any department determines there is a chance that the spill involves hazardous materials, appropriate Health Agencies will be notified.

Containment and Cleanup

There are three clean up scenarios for IDs. They are 1) Wastewater 2) Hazardous 3) Other non-hazardous.

Wastewater

Field crews responding to a sewage spill or overflow should contain the spill to prevent entry of sewage into the storm drain system or natural watercourse. This may involve a coordinated effort between:

- Streets Division
- Utilities Division, Maintenance
- Utilities Division, Water Production

To the MEP, sewage should be prevented from entering the storm drain system by covering or blocking storm drain inlets and catch basins or by containing or diverting the overflow away from open channels and other storm drain fixtures (use of sandbags, inflatable dams, etc.).

In the event that raw sewage enters a storm drain catch basin, where possible the sewage should be vacuumed or pumped out of the catch basin. If a sewage overflow enters a storm drain channel, where possible the downstream channel area should be blocked, flushed with potable water and the captured water pumped to a nearby sewer manhole. Any time a sewage spill enters the storm drain system and has the potential to reach coastal waterways, the local agency and L.A. County Dept. of Health Services, Bureau of Environmental Protection must be notified (323) 881-4147.

Once the spill is contained, it should be removed and the area disinfected. Every effort should be made to ensure that the disinfectant is not discharged to the storm drain system, using methods such as those described above.

Hazardous

Handling procedures regarding releases of hazardous or potentially hazardous substances into the environment shall be determined by the Fire Department. Material determined to be hazardous will be contained by the appropriate hazardous material response team. Methods of clean up will be determined by the Fire Department or applicable health agencies.

Non-Hazardous

Non-hazardous materials should generally be removed by appropriate City crews, as determined by the Director of Public Works and/or Management Analyst. Because the situations and materials will vary widely, procedures will vary as well. All materials should be prevented from entering waterways to the MEP.

Typical examples of non-hazardous materials include landscape waste, milk, flour, and many other organic liquids and solids or fine powders. These materials should generally be removed by first collecting and/or sweeping up all solids and disposing them in a landfill or other approved location.

Liquids should be diverted to an area away from waterways where they may be removed with a vacuum truck or can soak into the ground.

ID Abatement and Cleanup:

Response of Illicit Discharges requires one (1) business day response for abatement, containment and cleanup. This includes hazardous substances.

Enforcement

Enforcement procedures will be consistent with the City's permitted legal authority. Enforcement processes can include:

- Verbal or written warnings for minor violations
- Cease and desist orders
- Formal Notice of Violations

Enforcement activity will begin at the appropriate level as determined by the City's authorized representative. It need not necessarily be imposed sequentially. For incidents that are more severe or threatening at the outset, enforcement will start at an increased level. Enforcement steps will be accelerated if there is evidence of a clear failure to act, or an increasing severity of the discharge.

Record Keeping

All ID reports will be documented and on the “Illicit Discharge/Connection – Report/Response Form. All reports will be inputted into the NPDES ID/IC database (MS Access), and mapped on the City’s baseline stormdrain system map.

ILLICIT CONNECTIONS (ICs)

“Illicit Connection: Any man-made conveyance that is connected to the storm drain system without a permit, excluding roof-drains and other similar type connections. Examples include channels, pipelines, conduits, inlets, or outlets that are connected directly to the storm drain system.”

Storm Drain System Inspection

Per Order No. 01-182, the City will undertake the following procedures for storm drain inspection for illicit connections:

- Inspect open channels no later than February 3, 2003.
City crews will conduct visual inspection during annual open channel cleaning
- Inspect underground storm drains in priority areas no later than February 1, 2005.
City will contract for video screening service to perform this requirement
- Inspect underground storm drains with a diameter of 36 inches or greater no later than December 12, 2006.
City will contract for video screening service to perform this requirement

Receiving IC Reports

Reports of ICs will be forwarded to the Management Analyst. The following information should be collected: 1) Date, 2) Time, 3) Suspected Connection Address, 4) Reporting Party. When possible, the Illicit Discharge/Connection Report Form should be used. The form can be located on the Public Works Datafiles, under Department Forms – “Illicit Discharge Report-Response Form”.

Investigations

Investigations of ICs will include:

- During routine site inspections or storm drain system inspection activities look for connections that exhibit evidence of suspected illicit discharges.
- From suspected field personnel of general public reports

If evidence of an illicit discharge is detected and the source does not appear to be evident or above ground, an investigation to determine if the discharge is being conveyed through an illicit connection will be done. Methods to locate illicit connections can include the follows methods as determined appropriate by City:

- Document research (e.g., storm drain system maps, prior investigation documents, permit files)
- Physical inspections of catch basins, manholes, and lines large enough for safe entry
- Dye test
- Smoke tests
- T.V. inspections

Response Time

Actions will be taken from an investigation within 21 days from the discovery or upon receiving a report of a suspected illicit connection.

Illicit Connection Elimination

Once a suspected illicit connection has been located and the nature and source of the discharge has been identified, follow-up action will be initiated in one of the following ways as determined appropriate by the City authorized representative:

- If the discharge is determined to be exempt or conditionally exempt, the connection may be left intact. The connection must either be permitted or a record of the connection investigation will be kept on file.
- If the discharger applies for and receives a separate NPDES permit, the connection may be left intact.
- If the connection is the source of continuous or intermittent illicit discharges, either the discharge must be terminated, and a record of the connection kept on file, or the connection must be terminated, either voluntarily or through additional enforcement.

Upon confirmation of the illicit nature of a storm drain connection, the illicit connection will be terminated within 180 days (6 mo).

Enforcement

Enforcement procedures will be consistent with the City's permitted legal authority. Enforcement processes can include:

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- Cease and desist orders
- Formal Notice of Violations

Enforcement activity will begin at the appropriate level as determined by the City's authorized representative. It need not necessarily be imposed sequentially. For incidents that are

more severe or threatening at the outset, enforcement will start at an increased level. Enforcement steps will be accelerated if there is evidence of a clear failure to act, or an increasing severity of the discharge.

Record Keeping

All IC reports will be documented and on the “Illicit Discharge/Connection – Report/Response Form. All reports will be inputted into the NPDES ID/IC database (MS Access), and mapped on the City’s baseline stormdrain system map.

Questions regarding any of the procedures must be directed to the NPDES Program Administrator (Management Analyst).

Although this memo does outlines IC/ID procedures, the Illicit Discharge and Illicit Connection Program, as reference in the revised 2001 Model Program required under the LA Co. Municipal Storm Water NPDES Permit (Order No. 01-182; NPDES Permit No. CAS0004001), will be the governing document.