

I. Summary

The **City** is required to comply with illicit connection and discharge detection and elimination program requirements as specified in the Los Angeles County Municipal NPDES permit (“municipal permit”).

An illicit connection is any conduit or other device (e.g., curb outlets, drains directly connected to catch basins or storm drains) that transports an illicit discharge to a component of the municipal storm drain system (also referred to alternatively herein as the municipal separate storm sewer system or “MS4”).

An illicit discharge is any discharge that enters the MS4 and is not entirely composed of storm water and is not exempted under the municipal permit or other storm water NPDES permit.

MS4 means “a conveyance or system of conveyances (including roads with drainage systems, municipal streets, alleys, catch basins, curbs, gutters, ditches, manmade channels, or storm drains) owned by a State, city, county, town or other public body, that is designed or used for collecting or conveying storm water, which is not a combined sewer, and which is not part of a publicly owned treatment works, and which discharges to Waters of the United States.” **A water of the United States** generally means any water body (also alternatively referred to as a receiving water body) that is navigable. In the City’s case, the principal water body is the San Gabriel River.

II. Policy Statement

It is the **City’s** policy to comply with illicit connection and discharge detection and elimination requirements in accordance with the “municipal permit”. The policy addresses: (1) responding to reports of illicit connections and discharges from the public and City personnel; (2) investigating such reports to determine their validity; (3) eliminating a reported connection or discharge; (4) taking appropriate enforcement action to halt or prevent the discharge or connection; and (5) recording required information for internal and external reporting purposes (viz., to the California Regional Water Quality Control Board, Los Angeles Region).

III. Impacted Departments

Generally, the following departments are impacted by this policy:

IV. Illicit Connection Detection and Elimination Requirements

The City is required to terminate all detected illicit connections upon detection. An illicit connection is a connection through which an illicit discharge passes (see definition of illicit discharge below). It is the discharge rather than the connection itself that determines whether a connection is illicit.

There are 2 ways to detect illicit connections. One way is to investigate illicit connections reported from the public or City employees. The other way is to conduct field screening of the MS4.

1. Reports from the Public or City Personnel

The municipal permit requires the City to encourage public reporting of illicit connections and discharges. To that end, the City has designated an individual to receive, record, and respond to calls from the public made through the County's 24 hour hotline (888-CLEAN-LA) or through the City's own reporting number. The City publicizes its reporting hotline telephone number through various sources, including public education materials, newsletters, and its website. In addition, the City encourages its personnel to report any suspect illicit connection or discharge observed while performing routine, day-to-day functions to the ICID coordinator.

2. Field Screening

The municipal permit requires field screening of: (i) open channels by February 3, 2003; (ii) underground pipes in priority areas under 36" in diameter by February 1, 2005; and (iii) underground pipes with a diameter of 36 inches or greater by December 12, 2006.

Field screening *open channels* involves visual observations for suspect connections. Generally, suspect connections include pipes or outlets that show unusual staining or are suspected of being a conduit for an illicit discharge (e.g., any fluid that is colored, turbid, or has an odor). Open channel field screening only affects those municipalities that own open channels. The City is not among them.

Field screening of *underground pipes* in priority areas can be achieved through a variety of ways, including but not limited to: (i) video reconnaissance; (ii) random sampling of catch basins to detect flowing illicit discharges and tracing the discharge to the source (in accordance with Federal storm water regulations

specified under 40 CFR, 122.26)¹; (iii) interviews with storm drain maintenance personnel regarding the possible existence of suspect connections; and (iv) industrial and commercial inspections that resulted in the detection of suspect or actual illicit connections (e.g., floor drains connected to a catch basin).

3. Terminating the Connection

The municipal permit requires that an investigation be conducted within 21 days to determine the source of the connection, the nature and volume of discharge through the connection, and the party that is responsible for the connection. Once the connection and responsible party is identified, the City has 180 days to terminate the connection. Terminating a connection includes but is not limited to physically removing the connection or capping it at either end. An illicit connection may also be terminated by eliminating the source of the illicit discharge.

4. Reporting Requirement/Procedure

Upon receiving a report of a suspected or actual illicit connection the ICID coordinator shall record the date, time, and other basic information on the IDEAS report form. The City's policy is to initiate an investigation of a reported illicit connection {time} after the report is received. The collected information is also to be used for reporting illicit connection-related information to the regional board through the annual report, which requires the following:

- The number of illicit discharge identified
- The number of illicit discharges investigated
- The number of suspected illicit discharges that were investigated but were found to be exempted under the municipal permit or other NPDES storm water permit

¹Results of a field screening analysis for illicit connections and illegal dumping for either selected field screening points or major outfalls covered in the permit application. At a minimum, a screening analysis shall include a narrative description, for either each field screening point or major outfall, of visual observations made during dry weather periods. If any flow is observed, two grab samples shall be collected during a 24 hour period with a minimum period of four hours between samples. For all such samples, a narrative description of the color, odor, turbidity, the presence of an oil sheen or surface scum as well as any other relevant observations regarding the potential presence of non-storm water discharges or illegal dumping shall be provided. In addition, a narrative description of the results of a field analysis using suitable methods to estimate pH, total chlorine, total copper, total phenol, and detergents (or surfactants) shall be provided along with a description of the flow rate. Where the field analysis does not involve analytical methods approved under 40 CFR part 136, the applicant shall provide a description of the method used including the name of the manufacturer of the test method along with the range and accuracy of the test. Field screening points shall be either major outfalls or other outfall points (or any other point of access such as manholes) randomly located throughout the storm sewer system by placing a grid over a drainage system map and identifying those cells of the grid which contain a segment of the storm sewer system or major outfall. The field screening points shall be established using the following guidelines and criteria: (1) A grid system consisting of perpendicular north-south and east-west lines spaced 1/4 mile apart shall be overlaid on a map of the municipal storm sewer system, creating a series of cells; (2) All cells that contain a segment of the storm sewer system shall be identified; one field screening point shall be selected in each cell; major outfalls may be used as field screening points.

- The number of illicit connections that conveyed illicit discharges that were terminated
- The number of illicit connections that were removed
- The number of illicit connections that resulted in enforcement action
- The number of illicit connections that resulted in other actions

IV. Illicit Discharge Detection and Elimination Requirements

The City is required to terminate illicit discharges reported to it from the public or from City personnel.

1. Definition of an Illicit Discharge

An illicit discharge is defined under Section _____ of the City's storm water ordinance as "the entry of any material other than storm water {to the MS4} unless such discharge is exempted under the municipal NPDES permit, is allowed under a separate NPDES permit, including but not limited to a point source permit, a General Industrial Activity Storm Water permit, or General Construction Activity Storm Water permit, or is allowed by the Executive Officer." The City's definition of an illicit discharge is based on the definition provided in the Los Angeles County Municipal Storm Water NPDES permit ("municipal permit"). The City's reference to "other than storm water" effectively means the same thing: namely, non-storm water discharges that are not exempted under an NPDES storm water permit.

Included in the City's definition of an illicit discharge are any accidental spills occurring on a street or other public right of way which enter a catch basin. However, if a spill does not enter the catch basin or storm drain it will not be considered an illicit discharge, but instead will be recorded as a spill for internal purposes using the IDEAS report.

2. Exempted Discharges

The municipal permit allows the discharge of certain categories of non-storm water. They include: (1) natural springs and rising ground water; (2) flows from riparian habitats or wetlands; (3) stream diversions, permitted by the State Board; (4) uncontaminated ground water infiltration [as defined by 40 CFR 35.2005(20)]; (5) flows from emergency fire fighting activity; (6) reclaimed and potable landscape irrigation runoff; (7) potable drinking water supply and distribution system releases (consistent with American Water Works Association guidelines for dechlorination and suspended solids reduction practices); (8) drains for

foundations, footings, and crawl spaces; (9) air conditioning condensate; (10) dechlorinated/debrominated swimming pool discharges; (11) dewatering of lakes and decorative fountains; (12) non-commercial car washing by residents or by non-profit organizations; and (13) sidewalk rinsing.

3. Accidental Spills

In addition, discharges associated with accidental spills to the street or gutter including releases from vehicles, are only considered illicit discharges if the material enters a catch basin or storm drain. Such illicit discharges shall be reported on the IDEAS report.

4. Terminating the Discharge

The City is required by the municipal permit to investigate reports of illicit discharges “as soon as practicable.” Upon visual verification of the illicit discharge, designated personnel City {identify} shall prevent the discharge from entering the catch basin. Generally, any abnormal appearance of water in the gutter such as or color (e.g., green, brown, etc.), odor, turbidity, floatable material, or residue (e.g., oil sheen that is rainbow-like in appearance) is an indicator of an illicit discharge. Such discharge should be prevented from continuing to enter the catch basin. Typically this can be accomplished by blocking the catch basin inlet with sand bags or any device that would prevent entry of the discharge. If necessary, City personnel shall also remove any material left in the gutter (e.g., paint, oil, etc.). The next step is to terminate the source of the discharge (e.g., an individual dumping or flushing material into the MS4). If the source is coming from a curb outlet that appears to be associated with a building, City personnel shall notify the owner operator of the building or business that the illicit discharge must be terminated.

5. Reporting Procedure

Reports of illicit discharges and spills from the public or City employees are to be directed to the City’s ICID Coordinator. The ICID Coordinator is responsible for (1) recording the report; (2) dispatching appropriate City personnel to the scene of the reported discharge or spill; and (3) recording how the problem was resolved. The information is used for internal purposes and for reporting to the regional board on an annual basis. The annual report is the instrument that the regional board uses to evaluate the City’s performance in meeting municipal NPDES permit requirements. With respect to illicit discharges, the City is required to record the following information in its annual report:

- The number of illicit discharges that were reported during the permit year (coincides with the fiscal year)
- The number of illicit discharges that were discontinued, cleaned-up and the source of the discharge was identified

- The number of suspected illicit discharges that resulted in being non-illicit discharges or were not present at the time of observation
- The number of illicit discharges that were cleaned-up but the source could not be identified
- The number of suspected illicit discharges that were found to be exempted
- The number of suspected illicit discharges that were in compliance and the source identified