

November 10, 2003 Update

## SECTION 3: ILLICIT CONNECTIONS AND ILLICIT DISCHARGES ELIMINATION PROGRAM

### **Goal and Intent**

Illicit connections and illicit discharges are the means by which polluted urban runoff, trash and all manner of pollutants from paint and solvents to cigarette butts get into the storm drain system and end up in the rivers, lakes and ocean. The goal of the illicit connections and illicit discharges (ICID) elimination program is to remove all illegal connections and cease all prohibited discharges to the storm drain system. The ICID Elimination Model Program component of the countywide SQMP is available on-line at [www.ladpw.org/wmd/NPDES/ICID\\_TC.cfm](http://www.ladpw.org/wmd/NPDES/ICID_TC.cfm). The program includes documentation, tracking, and reporting of all discovered illicit connections and discharges. Reporting includes annual mapping of all documented incidents on a Geographic Information System (GIS).

An illicit connection occurs when someone connects a pipe, channel, conduit, or other man-made conveyance system to the municipal storm drain system through which prohibited non-stormwater flows are discharged. For instance, a car wash facility connecting its soapy water discharge pipe directly to the public storm drain system would be an illicit connection. Illicit connections shall be discovered through a combination of field screening of the storm drain system and investigation of citizen reporting.

An illicit discharge occurs when someone dumps something other than rainwater into the municipal storm drain system. Examples of illicit discharges include things like washing down lawn cuttings into the street drain, washing out paint in the street gutter, and rainwater contaminated with dirt from an unprotected stockpile entering the storm drain. Illicit discharges shall be controlled primarily through investigations in response to citizen reporting.

### **Meeting and Augmenting Requirements to Meet our Goal**

The watershed Cities and LA County have had programs to receive, respond to, and document investigations of illicit discharge and connection incidents for 10 years now. The procedures for receiving and responding to citizen reports of illegal dumping activities are well established. Every reported or discovered illicit connection or illicit discharge is investigated as immediately as practicable and every effort is made to identify the source, clean-up, disconnect, or otherwise abate any illegal activity. Each report and investigation is documented on file, listed in a database, and plotted in a GIS format for annual data transmittal to LA County for updating their regional mapping of ICIDs.

Each agency has assigned staff to be in charge of responding to storm water related citizen phone calls and document the calls. A 24-hour hotline was established and advertised - both to get the word out about reporting ICIDs and to give people somewhere to call anytime they have one to report. Now anyone can call 1-888CleanLA at any hour and file a report about illegal dumping or connections to the storm drain system. LA County records these hotline calls, responds to those in their jurisdiction and forwards the rest to the appropriate agencies. Whether a call was taken through the local City Hall's citizen request procedures or referred by the 888CleanLA hotline, the report is then referred to the assigned ICID staff person for immediate follow-up. Within 72 hours of receiving a report, an investigation is begun. In general, if the report comes in during business hours the agency responds on the same day, especially if the call involves active dumping at the time of the call!

An illicit discharge investigation typically includes a field visit to the location of the incident, sampling and testing of unknown pollutants found at the site, containment and abatement of discovered discharges and connections, and clean-up as needed. If a person is "caught red-handed" so to speak, then they would be educated on pollution prevention laws and the effects of their actions on the receiving waters and given both a verbal and written notice of violation plus educational materials. If no one is around but there is evidence of illegal dumping found, there is an attempt to locate the source (ie: is there construction activity, home projects, a pollutant trail back to the source?). If the source is located, similar procedures as above are followed. Sometimes a person cannot be located, but a property is identified as being involved. In that case, a letter regarding the violation is sent to the property owner, including educational materials and a discussion of pollution prevention laws citing municipal codes violated by the activity in question. A follow-up visit to the subject property is conducted when appropriate to confirm that the discharge has been ceased and cleaned up. The vast majority of ICID investigations end at this first point of contact. People are highly receptive to the information and want to do the right thing once they get the picture. Each incident is documented in the agency's ICID files, including name and contact information on the violator. However, if follow-up visits find that the violator is persisting with ICID activities, the next step would be to issue a second letter with formal notice of violation that indicates potential fines or civil action that can be brought if they do not cease and desist. After the second written warning of violation, the agency may refer a violation to the Regional Water Quality Control Board for further follow-up, which is likely to include a fine.

Illicit connections are similarly investigated, with one added step in identifying whether a discovered connection is already permitted through local agencies or covered under its own NPDES permit. This program has recently become more pro-active in identification and removal of illicit connections through field screening of the storm drain system. Field screening involves walking through open channels and televising underground pipes to locate and map all connections to the storm drain system. Once the connections to the storm drain system are mapped, each one must be documented as being permitted or legal

storm water discharge connections that can be permitted or as being an illicit connection that must be removed. Once an illicit connection has been identified, it must be removed within 180 days.

### **What We Plan to Do**

As we continue to implement the ICID Elimination program as described in the countywide SQMP, the following specific elements will be implemented by each watershed City:

- Maintain assigned staff to respond to ICID reports during business hours. When the primary ICID responder is out of the office, an alternate shall be designated.
- Provide staff training to ensure that ICID related reports are transferred to the appropriate individuals for response and to maintain at least two adequately trained responders. This includes annual training of administrative, public works, inspection, code enforcement, and building and safety staff that are in a position to receive such calls. A list of targeted staff for ICID training shall be developed and maintained, along with a record of all training provided.
- Develop and use standardized ICID investigation report forms for documentation of the reports and investigations.
- Develop and use form letters for initial and second notice of violation.
- Database ICID reports in a manner consistent with GIS attribute needs as requested by LA County.
- Map ICID incidents on GIS base map and submit to LA County each year.
- Develop and maintain a map of all storm drain infrastructure within the City Limits. This map shall include enough information to identify what receiving water a discharge will be released into from any point of discharge citywide.
- Develop and distribute public outreach materials that explain what illicit connections and discharge are, and what someone should do if they see one.

### **Future Focus**

- ❖ Acquire City GIS base map
- ❖ Acquire GIS shape file of storm drain system from LA County
- ❖ Acquire or develop a watershed-wide map of all storm drain infrastructure

### **Evaluation Indicators**

Documentation of the effective resolution of incidents is one good way to evaluate the effectiveness of this program. ICID incidents will be tracked and evaluated based on how they are resolved. Impediments to resolution of incidents will be noted and the ICID program revised as needed.

Another concrete indicator will be the existence of and maintenance of the watershed-wide storm drain and sewer system maps.

Documentation of the number of focused outreach campaigns that occur as a result of the ICID program implementation is another access to evaluation of program success.

An increase in the number of reported incidents can also be used to gauge if the public is becoming more aware of the ICID program.

### **Cost Tracking and Budgeting**

In order to appropriately budget for and report on the cost of implementing the ICID program, each agency will need to track the following related program costs:

- 1) **Staff time.** This item includes time spent by staff doing anything related to implementation of this program, such as developing report forms, storm drain mapping, documenting and investigating ICID reports, issuing letters of violation, developing and distributing ICID educational materials, etc. Ideally, all dedicated staff time would be tracked using a time card system with each employee indicating ICID specific hours on a weekly basis. However, since this is not a practical, ICID staff time will be through a combination of directly reported hours and percentage usage estimates for various staff positions. For example, the code enforcement officer may spend 10% of their time following up on ICID reports. The targeted staff training list will be used as a basis for identifying all staff time contributed to this program and a reasonable estimate of effort will be identified based on the volume of reporting received and investigated throughout each fiscal year.
- 2) **Consultants.** Any fees arising from consultant contracts that include ICID services shall be accounted for in the ICID budget.
- 3) **Direct Costs.** All costs realized through lab test fees, monitoring equipment acquisition or maintenance, printing, reproduction and distribution of information, or other expenditures directly related to ICID program implementation shall be documented in the ICID budget.