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1.1 BACKGROUND

The municipal stormwater National Pollutant Discharge Elimination System (NPDES) permit (Permit) issued to the Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the Los Angeles County by the Los Angeles Regional Water Quality Control Board on December 13, 2001. The Permit requires Permittees to implement an Illicit Connections and Illicit Discharges Elimination Program. This document describes a program that Permittees can follow to implement their own Illicit Connections and Illicit Discharges Elimination Program in compliance with the Permit.

Part 4.G of the Permit contains requirements specifically for the identification and elimination of illicit connections and illicit discharges to the municipal separate storm sewer system (MS4), generally referred to in this document as “storm drain system.” The Permit requirements are shown in Table 1-1. They are fully enforceable and can only be changed through action by the Regional Board. The model program contents will be reviewed and approved by the Regional Board staff (Executive Officer) and can be changed by approval of the Executive Officer.

Table 1-1 Permit Requirements - Illicit Connections and Illicit Discharges		
Permit Section	Requirement	Compliance Date
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.
4.G.1.b	Develop and maintain a listing of all permitted connections to the storm drain system.	February 03, 2003.
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.	To be determined by the Principal Permittee. The Principal Permittee must use the information no later than February 03, 2003.
4.G.1.b	Principal Permittee must use the information submitted by all Permittees to begin an annual evaluation of patterns and trends of illicit connections and illicit discharges.	February 03, 2003.
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.	For Permittees with a population of less than 250,000 (2000 U.S. Census), training shall be completed by August 01, 2002. For Permittees with a population of 250,000 or more (2000 U.S. Census), training shall be completed by February 03, 2003.

Table 1-1 Permit Requirements - Illicit Connections and Illicit Discharges		
Permit Section	Requirement	Compliance Date
4.G.2.a.1.i	Field screen open channels in the storm drain system for illicit connections.	February 03, 2003.
4.G.2.a.1.ii	Field screen underground pipes in priority areas of the storm drain system for illicit connections.	February 01, 2005.
4.G.2.a.1.i	Field screen underground pipes with a diameter of 36 inches or greater in the storm drain system for illicit connections.	December 12, 2006.
4.G.2.a.1	Report to the Principal Permittee 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.	Information to be provided to the Principal Permittee on an annual basis.
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.
4.G.2.b.1	Initiate an investigation of reported suspected illicit connections to the storm drain system.	Within 21 days of receiving a report of a suspected illicit connection.
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.

The requirement to implement an Illicit Connection/Illicit Discharge Elimination Program is based on one of the two primary objectives set forth in the Federal Clean Water Act amendments of 1987 which established the framework for regulating stormwater discharges from municipal, industrial and construction activities under the NPDES system:

- Effectively prohibit non-stormwater discharges.
- Reduce the discharge of pollutants to the maximum extent practicable (MEP).

To meet this statutory objective, the federal regulatory requirements for municipal Permittees include implementing a comprehensive program, and best management practices (BMPs) to *detect and remove illicit discharges and improper disposal into the storm drain system.*

1.2 NATURE AND TYPES OF ILLICIT DISCHARGES AND ILLICIT CONNECTIONS

1.2.1 Illicit Discharges

The Permit has established definitions of illicit discharge and illicit disposal as follows:

“Illicit Discharge: Any discharge to the storm drain system that is prohibited under local, state or federal statutes, ordinances, codes or regulations. The term illicit discharge includes all non-storm water discharges except discharges pursuant to an NPDES permit, discharges that are identified in Part 1, ‘Discharge Prohibitions’ of this order, 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.”

Categories of non-stormwater discharges that are not prohibited under the Permit are listed in Table 1-2.

The context of illicit discharges and illicit disposal used in this model program includes several categories as follows:

- Incidental spills or disposal of wastes or non-stormwater. These may be intentional, unintentional or accidental and would typically enter the storm drain system directly through drain inlets, catch basins or manholes or be deposited in the public right-of-way such that wash-off would reach the storm drain system.
- Discharges of sanitary sewage due to overflows or leaks; usually incidental but may be continuous.
- Continuous or intermittent discharges of prohibited non-stormwater other than through an illicit connection. These typically occur as surface runoff from outside the public right-of-way (e.g., area washdown from an industrial site).

Continuous or intermittent non-stormwater discharges through an illicit connection (see Section 1.2.2).

Table 1-2 Exempt Discharges⁽¹⁾
<ul style="list-style-type: none"> • Discharges in compliance with a separate NPDES permit/waste discharge requirements (WDR) or granted a discharge exemption by the Regional Board, the Executive Officer, or the State Water Resources Control Board.
<p>Exempted discharges ⁽²⁾ including:</p> <p>Category A – Natural flow:</p> <ol style="list-style-type: none"> 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 40CFR 35.2005(20)]

Category B – Flows from emergency fire fighting activity.

Category C – Flows incidental to urban activities:

1. Reclaimed and potable landscape irrigation runoff;
2. Potable drinking water supply and distribution system releases (consistent with American Water Works Association guidelines for dechlorination and suspended reduction practices);
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.

- (1) The Executive Officer may add or remove categories of non-storm water discharges.
- (2) However, if any such discharges are determined to be a source of pollutants by the Regional Board Executive Officer, the discharge will no longer be exempt from this prohibition unless the Permittee implements conditions approved by the Regional Board Executive Officer to ensure that the discharge is not a source of pollutants. Notwithstanding the above, the Regional Board Executive Officer may impose additional prohibitions of non-storm water discharges in consideration of anti-degradation policies and TMDLs.

1.2.2 Illicit Connections

The Permit defines illicit connection as:

“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.”

However, since not all agencies formally permit connections, as used in this model program an illicit connection is any man-made conveyance that is connected to the storm drain system and through which prohibited non-stormwater flows are discharged. This includes channels, pipelines, conduits, inlets or outlets that are connected directly to the storm drain system. Roof drains, area drains, and other similar connections which are intended to convey only stormwater runoff are excluded, unless they are also used to convey an illicit discharge.

1.3 PROGRAM SUMMARY

Each Permittee will continue implementation of an illicit connection/illicit discharge elimination program that includes the following components:

- Illicit discharge elimination
- Illicit connection elimination
- Public reporting
- Reporting hazardous substances entering the storm drain system

A brief summary of the baseline objectives of each component relative to the nature and type of illicit discharges and illicit connections follows.

1.3.1 Illicit Discharge Elimination

The goal of this component is to detect and eliminate illicit discharges from entering the storm drain system to reduce pollutants from such discharge to the maximum extent practicable. The baseline objectives are:

- Incidental spills, or disposal (including sanitary sewer leaks or overflows) reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities will be investigated, contained and cleaned up.
- Prohibited non-stormwater discharges to the storm drain system reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities (such as surface runoff associated with washdown from an industrial site) will be eliminated through voluntary termination or enforcement action.
- Suspected prohibited non-storm discharges in the storm drain system reported by the public or other agencies or observed by Permittee staff during the course of their normal daily activities, that may result from illicit connections or whose origin is unknown, will be investigated to determine the nature and source of the discharge and eliminated through voluntary termination or enforcement action.

Permittees shall investigate and respond with activities to abate and clean up illicit discharges, in accordance with the time and the methods defined in this model program.

Implementation requirements for this component of the program are contained in Section 2.

1.3.2 Illicit Connection Elimination

The goal of this component is to detect and eliminate illicit connections to reduce pollutants discharged through such connections to the maximum extent practicable. The baseline objectives are:

- A screen of the storm drain system will be conducted by maintenance personnel for illicit connections following the schedule contained in Table of Section 3 of this report (Part 4.G.2.a.1 of the Permit)..
- A connection to the storm drain system, that is suspected or observed to be the source of an illicit discharge, will be investigated to determine the source and nature of the discharge. The connection may be discovered while investigating a suspected illicit discharge, or while field screening the storm drain system in accordance with requirements set forth in Part 4.G.2.a.1 of the Permit, or detected by field staff during the course of their normal daily activities.

- Once the illicit connection/discharge has been investigated as described in Section 2, one of the following actions must occur:
 - If the discharge is determined to consist only of exempted non-stormwater, the connection will be allowed to remain and will no longer be considered an illicit connection. Permittees may elect to issue a permit for the connection or allow the connection to remain if information on the connection is recorded as described in the model program; or
 - The discharge will be permitted through a separate NPDES permit; or
 - The connection will be terminated through voluntary action or enforcement proceedings.

Permittees shall investigate and terminate illicit connections in accordance with the time and the methods defined in this model program.

Implementation requirements for this component of the program are contained in Section 3.

1.3.3 Public Reporting

The goal of this component is to promote, publicize and facilitate public reporting of illicit discharges and illicit disposal practices. The baseline objective is:

- Each permittee will implement a program to receive incoming calls from the public regarding potential illicit discharges and illicit disposal practices, communicate and coordinate a response, follow up with the complainant, and maintain documentation.

Implementation requirements for this component of the program are contained in Section 4.

1.3.4 Reporting Hazardous Substances Entering the Storm Drain System

The goal of this component is to facilitate appropriate reporting of hazardous substances entering the storm drain system as a result of an illicit discharge. The baseline objective is:

- Each permittee will implement a program to report and document reportable quantities of hazardous substances entering the storm drain system.

1.4 IMPLEMENTATION REQUIREMENTS FOR THIS COMPONENT OF THE PROGRAM ARE CONTAINED IN SECTION 5. PERFORMANCE MEASURES

Performance measures define the level of Permittee program activities that are needed to ensure compliance with this model program and the goals outlined under the Permit. Appendix A outlines the specific activities to be tracked through the use of performance measures, and representative target goals for each measure.

The program activities discussed in this model program are intended to identify and eliminate discharges associated with illegal dumping or illicit connections to the storm drain system. As a result, the performance measures in Appendix A are based upon accepted practices described in this model program and performance standards in compliance with NPDES permit conditions.

2.1 INTRODUCTION

The goal of the illicit discharge elimination program is to detect and eliminate non-stormwater discharges (except those exempt discharges listed in Table 1-2) from entering the storm drain system to reduce pollutants from such discharge to the maximum extent practicable. Each Permittee’s program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as shown in Table 2-1.

Table 2-1 Permit Requirements - Illicit Discharge Elimination		
Report Section	Requirement	Permit Section
2.2.2 2.2.3	Implement procedures for containment and cleanup of illicit discharges.	4.G.3.a
2.2.3	Implement procedures for investigation of illicit discharges.	4.G.3.b
2.2.4	Implement of procedures to educate inspectors, maintenance workers and other field staff to notice illicit discharges during the course of their daily activities and report such occurrences.	4.G.1.c
2.2.5	Implement of enforcement procedures to eliminate illicit discharges.	4.G.3.b
2.2.6	Implement of a record keeping system to document illicit discharges.	4.G.1.b & U-4.F.13
2.2.7	Implement procedures to map all illicit discharges	4.G.1.b

Although not set as a requirement of the 2001 NPDES Permit, permittees should continue to maintain and use industrial/commercial education and outreach materials. Implementation guidelines for this component are included in Section 2.2.8

The baseline objectives of the program are:

- Incidental spills, or disposal (including sanitary sewer leaks or overflows) reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities will be investigated, contained and cleaned up.
- Prohibited non-stormwater discharges to the storm drain system reported by the public or other agencies or observed by Permittee field staff during the course of their normal daily activities (such as surface runoff associated with washdown from an industrial site) will be eliminated through voluntary termination or enforcement action.
- Suspected prohibited non-storm discharges in the storm drain system reported by the public or other agencies or observed by Permittee staff during the course of their normal daily activities, that may result from illicit connections or whose origin is unknown, will

be investigated to determine the nature and source of the discharge and eliminated through voluntary termination or enforcement action.

2.2 PROGRAM IMPLEMENTATION ELEMENTS

2.2.1 Spill Prevention Methods

The best way to contend with spills is to prevent them from occurring. Guidance is included in Appendix B.

2.2.2 Spill Prevention Coordination

Within agency responding divisions or sections, responsible staff, and level of support provided to lead emergency response agencies, will be identified. Within agency, spill response training, spill response equipment and activities to improve spill response procedures will be identified. Guidance is included in Appendix C.

2.2.3 Spill Investigation, Containment and Cleanup

Standardized procedures will be implemented to investigate, contain and clean up spills. These must include procedures to ensure that sewage treated with disinfection agents will not be discharged into the storm drain system to the extent practicable. The standard procedures include:

- Receive call on spill (see also Section 4, Public Reporting).
- Dispatch appropriate personnel to perform material investigation and cleanup.
- Contain spill/material and minimize release to storm drain system or receiving waters.
- Record required information at spill site.
- Perform field tests as necessary to determine type and source of spill.
- If the call was received through the LACDPW Hotline, notify the LACDPW dispatcher upon incident closure.

Standard procedures will be implemented to respond within one business day of discovery or a report of a suspected illicit discharge, with activities to abate, contain, and clean up all illicit discharges, including hazardous substances. Investigation of illicit discharges will be carried out as soon as practicable.

Guidance is included in Appendix D.

2.2.4 Education Program for Inspectors, Maintenance and Field Staff

Permittee staff will be required to implement the baseline objectives of observing, reporting, investigating and eliminating illicit discharges to the storm drain system.

Standardized procedures will be implemented to educate inspectors, maintenance workers, and other field staff to notice illicit discharges during the course of their daily activities and report them. The standard procedures include:

- Compile and/or prepare training materials, such as handouts and posters. Topics will include:
 - Stormwater quality requirements
 - Types of illicit discharges/disposal
 - Reporting forms
- Identify staff who conduct field activities and others who may benefit from training.
- Present information on illicit discharges during regular safety and tailgate meetings.
- Discuss how to report illicit discharges:
 - Call in report to request investigation and cleanup.
 - Fill out illicit discharge reporting forms.

Guidance for conducting the staff educational program for noticing and reporting illicit discharges is included in Appendix E.

Refresher training for all targeted employees who are responsible for identification, investigation, termination, cleanup, and reporting of illicit discharges will be conducted annually.

The education program will also help appropriate Permittee staff to determine the appropriate follow-up activity when evidence of illicit discharges is observed. This includes:

- If the nature and source of the discharge is known or readily apparent, enforcement procedures will be initiated as discussed in Section 2.2.5.
- If the nature and source of the discharge is not known, additional investigation techniques will be used to determine the nature of the material and investigate the source. Guidance is included in Appendix F.
- If the illicit discharge is suspected to be through an illicit connection, procedures described in Section 3, Illicit Connection Elimination, will also be followed.

2.2.5 Standardized Enforcement Procedures

Enforcement procedures will be implemented to eliminate illicit disposal or discharges. The procedures will be followed when the source and nature of the discharge is known. Enforcement procedures will be consistent with the Permittee's legal authority. While legal authority for Permittees varies, most enforcement processes follow a common sequence. Typically they include:

- Verbal or written warnings for minor violations
- Formal notice of violation or non-compliance with specific actions and time frames for compliance
- Cease and desist or similar order to comply
- Specific remedies such as civil penalties (e.g., infraction), non-voluntary termination with cost recovery, or referral for criminal penalties or further legal action

Enforcement activity will begin at the appropriate level as determined by the Permittee'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. A sample enforcement strategy and guidance are included in Appendix G.

2.2.6 Record Keeping and Documentation

A standardized record keeping system will be implemented to document illicit discharges detected within the local jurisdiction. The standard elements are:

- Record the following minimum information on all detected illicit discharges:
 - Date/time of the incident
 - Location
 - Type of material
 - Source, if determined
 - Action taken
 - Date incident was closed
- Forward the information to a designated individual/department.

A form that can be used to collect this information, *Illicit Discharge/Connection Reporting and Response* form, is included in Appendix H.

2.2.7 Mapping Illicit Discharges

The 2001 NPDES permit requires all permittees to map all illicit discharges within their local jurisdiction. In addition, as presented in Section 2.2.6, a standardized record keeping system (most likely in the form of a tabular database) will be implemented. A system is needed to facilitate analysis and identify priority areas of illicit discharges. A Geographic Information System (GIS) is the ideal tool to spatially integrate and analyze the required data.

A standardized mapping system using GIS will be implemented to map all illicit discharges within the local jurisdiction.

2.2.8 Industrial/Commercial Outreach Materials

Industrial/commercial education and outreach materials will be made available to field staff to be handed out as needed whenever illicit discharges are observed. The following materials have been developed for use by all Permittees under the Immediate Outreach component of the Public Information and Participation Program:

- Flyers/posters of Good Operating Practices for:
 - Auto repair industry
 - Gas stations
 - Food and restaurant industry

Copies of the materials are included as Appendix I.

The following materials were developed as a joint effort between the Industrial/Commercial Educational Program and the Five-Year Storm Water Public Education Strategy component of the Public Information and Participation Program of the 1996 NPDES Permit, and will be available for this Illicit Connection/Illicit Discharge Elimination Program:

- General stormwater quality brochure for industrial/commercial facilities.
- Fact sheets on all industrial groups regulated under Phase 1 of the federal stormwater program.

3.1 INTRODUCTION

Illicit connections are defined here as specific pathways for illicit discharges, even though a discharge may be infrequent or intermittent. The goal of the illicit connection elimination program is to eliminate these connections to the maximum extent practicable. Each Permittee’s program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as shown in Table 3-1.

Table 3-1 Permit Requirements - Illicit Connection Elimination		
Report Section	Requirement	Permit Section
3.2.1	Implement storm drain inspection procedures.	4.G.2.a.1
3.2.2	Implement illicit connection investigation procedures	4.G.2.b.1
3.2.2	Implement illicit connection termination procedures.	4.G.2.b.2
3.2.4	Implement enforcement procedures to eliminate illicit connections.	4.G.2.b.2
3.2.5	Implement a record keeping system to document illicit connections.	4.G.1.b

The baseline objectives of the program are:

- A screening of the storm drain system will be conducted by maintenance personnel for illicit connections following the schedule presented in Section 3.2.1.
- A connection to the storm drain system, that is suspected or observed to be the source of an illicit discharge, will be investigated to determine the source and nature of the discharge. The connection may be discovered while investigating a suspected illicit discharge, or detected by field staff during the screening of the storm drain system or during the course of their normal daily activities.
- Once the illicit discharge has been investigated as described in Section 2, one of the following actions must occur:
 - If the discharge is determined to consist only of exempted non-stormwater, the connection will be allowed to remain and will no longer be considered an illicit connection. Permittees may elect to issue a permit for the connection or allow the connection to remain if information on the connection is recorded as described in the model program; or
 - The discharge will be permitted through a separate NPDES permit; or
 - The connection will be terminated through voluntary action or enforcement proceedings.

This strategy is summarized in Figure 3-1.

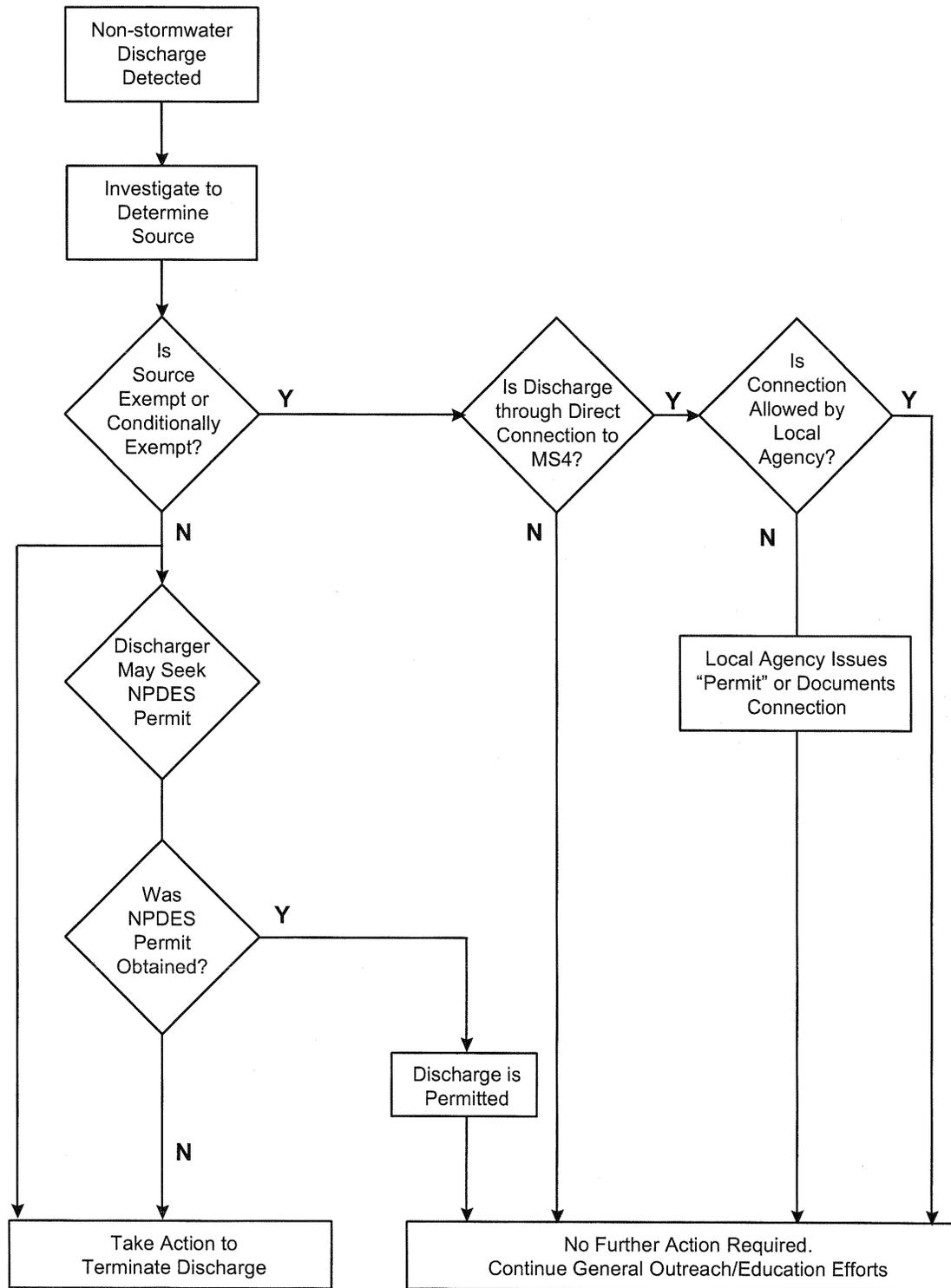


Figure 3-1
Illicit Discharge/Illicit Connection Elimination Strategy

3.2 PROGRAM IMPLEMENTATION ELEMENTS

3.2.1 Storm Drain System Inspection

Standardized procedures for storm drain inspection for illicit connections will be implemented. The procedures include:

- Inspect open channels no later than February 3, 2003.
- Inspect underground storm drains in priority areas no later than February 1, 2005.
- Inspect underground storm drains with a diameter of 36 inches or greater no later than December 12, 2006.

3.2.2 Illicit Connection Investigation

Standardized procedures for identification of illicit connections will be implemented. The procedures include:

- During routine site inspections (e.g., Industrial Waste, Hazardous Materials, construction), or storm drain system inspection activities as outlined in Section 3.2.1, look for connections that exhibit evidence of suspected illicit discharges.
- If evidence of an illicit discharge is detected, as discussed in Section 2, and the source does not appear to be evident or above ground, investigate to determine if the discharge is being conveyed through an illicit connection. Methods to locate illicit connections include:
 - 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
- Permittees will initiate an investigation within 21 days from the discovery or upon receiving a report of a suspected illicit connection.

Guidance for the selection and use of appropriate field screening techniques is included in Appendix J.

3.2.3 Illicit Connection Termination

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:

- 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 as described in Section 3.2.5.
- 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 as discussed in Section 2 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.

Appropriate staff, such as inspectors and field crews, should be educated about how to conduct illicit connection investigations. Guidance for conducting an educational program is included in Appendix E.

3.2.4 Standardized Enforcement Procedures

Enforcement procedures will be implemented when terminating illicit connections. Enforcement procedures will be consistent with the Permittee's legal authority. While legal authority for Permittees varies, most enforcement processes follow a common sequence. Typically they include:

- Verbal or written warnings for minor violations
- Formal notice of violation or non-compliance with specific actions and time frames for compliance
- Cease and desist or similar order to comply
- Specific remedies such as civil penalties (e.g., infraction), non-voluntary termination with cost recovery, or referral for criminal penalties or further legal action

Enforcement activity will begin at the appropriate level as determined by the Permittee'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. An example of enforcement strategy and guidance is included in Appendix G.

3.2.5 Record Keeping and Documentation

A standardized record keeping system will be implemented to document illicit connections detected within the local jurisdiction. The standards elements are:

- Record the following minimum information on all suspected illicit connections:
 - Type of connection
 - Location
 - Evidence of illicit discharge
 - Action taken
 - Date incident was closed

- Forward the information to a designated individual/department.

A form that can be used to collect this information, *Illicit Discharge/Connection Reporting and Response*, is included in Appendix H.

3.2.6 Mapping Illicit Connections

The 2001 NPDES permit requires all permittees to map all illicit connections within their local jurisdiction. In addition, as presented in Section 3.2.5, a standardized record keeping system (most likely in the form of a tabular database) will be implemented. A system is needed to facilitate analysis and identify priority areas of illicit discharges. A Geographic Information System (GIS) is the ideal tool to spatially integrate and analyze the required data.

A standardized mapping system using GIS will be implemented to map all illicit discharges within the local jurisdiction.

4.1 INTRODUCTION

The goal of the public reporting program is to promote, publicize, and facilitate public reporting of illicit discharges and illicit disposal incidents. Each Permittee's program must meet the requirements of the Los Angeles County municipal stormwater permit (Permit), as shown in Table 4-1.

Table 4-1 Permit Requirements - Public Reporting		
Report Section	Requirement	Permit Section
4.2.1	Implement a system to receive incoming complaints.	4.B.1.b

Guidance for conducting all public reporting activities is included in Appendix K.

The baseline objective of the program is:

- A program will be implemented to receive incoming calls from the public regarding potential illicit discharges and illicit disposal practices, communicate and coordinate a response, follow up with the complainant, and maintain documentation.

4.2 PROGRAM IMPLEMENTATION ELEMENTS**4.2.1 Receiving Incoming Calls**

Procedures will be implemented to receive incoming reports of illicit discharge/disposal incidents. The procedures include:

- If desired, use the countywide 888-CLEAN-LA hotline reporting system maintained by LACDPW.
- If the LACDPW system is not used, establish and maintain a local hotline reporting system.
- Receive calls and collect relevant information about the discharge/disposal.
- Promote and publicize the appropriate hotline number to the public.

4.2.2 Communications and Coordination

Procedures will be implemented to communicate with and coordinate activities between Permittees to promptly investigate reports of illicit discharge/disposal. The procedures include:

- Determine jurisdiction of the reported illicit discharge/disposal incident.
- If within Permittee's jurisdiction, dispatch appropriate personnel to perform material investigation and cleanup, in accordance with procedures described in Section 2, Illicit Discharge Elimination.
- If incident is under another jurisdiction, call and/or fax known information about the discharge/disposal to the appropriate agency.
- If the call was received through the LACDPW Hotline, notify the LACDPW dispatcher upon incident closure.

4.2.3 Follow up with Complainant

Procedures will be implemented to notify the complainant of any action taken, if appropriate. The elements are:

- Determine which reports of illicit discharge/disposal were received from individuals who gave a name and address or phone number.
- Periodically notify the individual of the status of the incident, including a final notification upon incident closure.

4.2.4 Record Keeping and Documentation

As discussed in Section 2, Illicit Discharge Elimination, a standardized record keeping system will be implemented to document illicit discharges detected within the local jurisdiction. Staff involved with receiving public reports of illicit discharge/disposal will forward all necessary information to a designated individual/department for incorporation into illicit discharge records.

SECTION FIVE Reporting Hazardous Substances Entering the Storm Drain System

5.1 INTRODUCTION

The goal of this program is to facilitate appropriate reporting of hazardous substances as a result of an illicit discharge.

The baseline objective of the program is:

- A program will be implemented to report and document reportable quantities of hazardous substances entering the storm drain system.

5.2 DEFINITIONS OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES

The 1996 NPDES Permit defined a hazardous substance as a material defined under 40 Code of Federal Regulations (CFR) § 302. These are categorized as either “listed” or “unlisted” hazardous substances. Listed hazardous substances are contained in a table, Table 302.4, which is included in Appendix L. Unlisted hazardous substances are certain items of solid waste that exhibit characteristics identified in 40 CFR § 261.20 through 261.24. Copies of these sections are also included in Appendix L. Examples of hazardous substances include any substance or chemical product for which one or more of the following applies:

- A material safety data sheet (MSDS) is required
- The substance is listed as radioactive by the Nuclear Regulatory Commission
- The substance is listed as hazardous by the U.S. Department of Transportation
- The material is listed in Labor Code § 6382(b)

The above four categories are described in the California Health and Safety Code, Division 20, Chapter 6.95, Hazardous Materials Release Response Plans and Inventory.

The 1996 NPDES Permit defined a reportable quantity of hazardous substance as the quantity set forth in 40 CFR § 302. For listed hazardous substances, this amount is the quantity listed in the column “Final RQ” on Table 302.4. For unlisted hazardous substances, this amount is generally 100 pounds.

SECTION FIVE Reporting Hazardous Substances Entering the Storm Drain System

5.3 PROGRAM IMPLEMENTATION ELEMENTS

5.3.1 Notification Procedures

Procedures will be implemented to report incidents of “reportable quantity” of hazardous substances entering the storm drain system. The procedures include:

- When spill/illicit discharge/disposal materials are suspected to be hazardous, notify the appropriate Administering Agency.
- The Administering Agency will conduct a material investigation.
- If the material is hazardous, the Administering Agency will notify local, state and federal agencies and private contractors as necessary.
- If the material equals or exceeds the reportable quantity in a 24-hour period, the Administering Agency (or a designated individual/department) will notify the California Office of Emergency Services (OES) and the National Response Center.

A complete description of procedures for handling releases of hazardous substances is contained in each agency’s *Emergency Response Procedures* manual. Additional guidance is included in Appendix M.

5.3.2 Record Keeping and Documentation

As discussed in Section 2, Illicit Discharge Elimination, a standardized record keeping system will be implemented to document illicit discharges detected within the local jurisdiction, including hazardous substances. Staff involved with reporting hazardous substances will forward all necessary information to a designated individual/department for incorporation into illicit discharge records.

Other reporting requirements for hazardous substances, unrelated to stormwater quality, are covered in a number of federal and state regulations. Details are contained in each agency’ *Emergency Response Procedures* manual. Guidance is included in Appendix M.