

CITY OF CAMAS IDENTIFICATION & REPORTING FOR ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE)



National Pollution Discharge Elimination System
NPDES Phase II Permit Requirement – S5.C.3

Why is this information important?

- Everyone should have an idea about how to:
 - Identify an illicit discharge and connection, and
 - Respond and report illicit discharges and connections
- This is a requirement of the City's NPDES Phase II Permit, per Section S5.C.3(c).
- Illicit discharges and connections are prohibited, per Camas Municipal Code 14.04 IDDE.
- Further information can be found in the City's Illicit Discharge Detection & Elimination (IDDE) Program Manual.

Illicit Discharge Detection & Elimination (IDDE) Program Manual

The manual in it's entirety can be
found on the City's website:
[www.cityofcamas.us/index.php/
engmain/stormwater](http://www.cityofcamas.us/index.php/engmain/stormwater)



Illicit Discharge Detection and Elimination (IDDE) Program Manual

This behavior....



Contributes to this.....



Goals

To Understand:

- What is IDDE?
- What types of discharges are illicit, and what types are not.
- How to identify an illicit discharge or connection.
- How to report an illicit discharge or connection.
- How to respond to an illicit discharge or connection.

This is an illicit discharge!



What is IDDE?

IDDE:

Illicit Discharge Detection and Elimination

Permit Requirement:

Phase II Permittees shall fully implement an ongoing IDDE Program by August 16, 2011. (Per S5.C3)

Purpose of the program is to 'identify and remove illicit discharges and connections from regulated municipal separate storm sewer systems (MS4).'



What Makes Up A Storm Sewer System?

A Storm Sewer System Includes:

- Roadside ditches & culverts,
- Curbs & gutters,
- Catch basins & manholes,
- Storm sewer pipes,
- Stormwater facilities, and
- Any other means of collecting or conveying stormwater runoff that is not connected to a wastewater collection system or treatment plant.



All of these components make up a storm sewer system.

What is an MS4?

An MS4 is a Municipal Separate Storm Sewer System of conveyances that is:

- Owned by a state, city, town, village, or other public entity that discharges to Waters of the State;
- Designed or used to collect or convey stormwater only;
- It is not combined with sanitary sewer; and
- Is not part of a Publicly Owned Treatment Works (sewage treatment plant).

What is a Discharge?

- The process of releasing any substance into the MS4 and/or Waters of the State that is not entirely comprised of stormwater.
- Waters of the State include creeks, streams, rivers, lakes, wetlands, etc.
- There are 3 types of discharges:
 - Illicit
 - Conditionally Allowed
 - Authorized by Ordinance or Other NPDES Permits

What is an Illicit Discharge?



- Any discharge to a municipal separate storm sewer that is not composed entirely of stormwater. This includes ‘sediment-laden/muddy’ water and automobile oil!
- Exceptions: ‘Authorized’ and ‘Conditionally Allowed’ discharges which are described later in the presentation.

Types & Indicators of Illicit Discharges

- **Petroleum Hydrocarbons**

Conspicuous visual evidence such as oil sheen and/or odor evidence, dead organisms, potential nearby sources

- **Foam**

Usually attributed to natural causes, sometimes affiliated with an illicit discharge/connection. Likely illicit if the discharge is:

- Lathers when agitated, produces large white bubbles, or has an unnatural odor

- **Sewage**

Discolored water containing solid particles, bubbles, odor, grayish or dirty hue, dead organisms

- **Dumping of solids and/or liquids**

Visible debris and/or discolored water

- **Construction Sites**

Brown-colored water from sediment discharges due to inadequate erosion prevention measures

Additional Types of Illicit Discharges

- Trash , debris, or food waste
- Construction materials, including silt, sediment, concrete, cement, or gravel
- Automotive products, including antifreeze , oil, gasoline, or grease
- Paints, stains, resins, lacquers, or varnishes
- Drain cleaners
- Pesticides, herbicides, or fertilizers
- Soaps, detergents, or ammonia
- Pet waste, or 'wasted' pets
- Lawn clippings, leaves, branches, bark dust, or other fibrous materials
- Recreational vehicle waste or other sewage
- Any hazardous material or waste not listed above

Recognizing 'Non-Emergency' Illicit Discharges/Spills

- Paint
- Solvents
- Food waste
- Mop water
- Failing septic systems
- Muddy water
- Vehicle/Building wash water
- Water main break
- Unknown material

**A 'non-emergency' spill can change to an emergency spill depending on the quantity / situation!!!



What are we really looking for ...

The common sense approach!



- If it isn't raining, the storm drain should be dry; an exception would be underground springs, e.g. Prune Hill! Lot's of springs ...
- Groundwater is crystal clear;
- If it looks and/or smells polluted, it probably is;
- Streaks of lush green grass during a drought should suggest that something is amiss!

Sourcing Illicit Discharges

- Illicit Discharges are most easily observed during dry weather!
- The source may not be easily identified ... look upstream for an illicit connection or other evidence of discharge!



Authorized Discharges

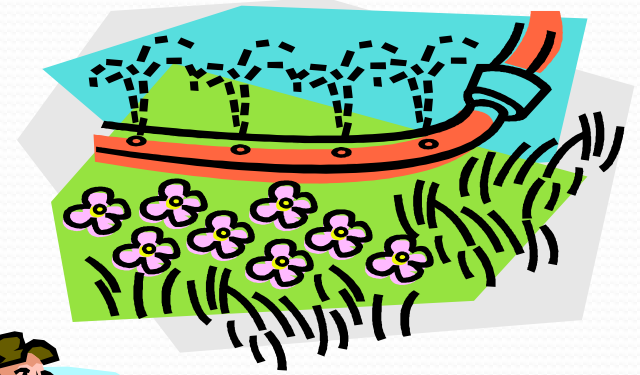
Examples:

- Emergency fire-fighting activities
(practice burns do not count!)
- Diverted streams flows
- Rising groundwater
- Uncontaminated groundwater infiltration
- Uncontaminated pumped groundwater
- Uncontaminated water from foundation drains, crawl spaces, or sumps
- Air conditioning condensation
- Springs
- Flows from riparian habitats and wetlands
- Discharges associated with separate NPDES permits issued by the Department of Ecology!



Conditionally-Allowed Discharges

- Potable water, de-chlorinated and discharged at a rate to prevent re-suspension of sediments into the MS₄
- De-chlorinated pool / spa water which does not contain algacides and discharged at a rate to prevent re-suspension of sediments in the MS₄
- Lawn watering and irrigation runoff, unless the activity is causing pollution of surface or ground water
- Soap and sediment-free discharges from street and building exterior washing activities



What is an Illicit Connection?

Any manmade conveyance that is connected to a municipal separate storm sewer without a permit; excluding roof drains & other similar connections.

Examples:

- Floor drains,
- Sanitary sewer connections,
- Pipelines, conduits, or inlets/outlets that are directly connected to a storm sewer.



Reporting & Responding to Illicit Discharges and/or Connections

- If an illicit discharge and/or connection is found in the City's storm sewer system and is, or has the potential for impact on Waters of the State ...
- Reports can be made as follows:
 - Illicit Discharge Hotline at (360) 817-1565
 - After hours emergency problems (360) 737-0592 or 911
 - City's Mobile App 'CamasConnect 24/7'
 - Directly to Dept. of Ecology Southwest Regional Office at (360) 407-6300.
 - An Illicit Discharge Report form available on the City's website at <http://www.ci.cameras.wa.us/index.php/how-do-i/faq-kb> , under Engineering. This form can be faxed, emailed, or hand delivered to the City.

An example of an IDDE Reporting Form

The form, in it's
entirety, can be
found on the City's
website.

<http://www.cityofcamas.us/index.php/how-do-i/faq-kb>, Engineering

CITY OF CAMAS
ILLCIT DISCHARGE REPORT
Public Works Department, 616 NE 4th Avenue,
Camas, WA 98607
(360) 817-1565
Fax (360) 834-1535

Date:	_____
Person Reporting Illicit Discharge:	_____
Organization:	_____
Address:	_____
Phone Number:	_____
Type of Illicit Discharge:	<input type="text"/>
Location of Illicit Discharge:	<input type="text"/>
What Caused Discharge:	<input type="text"/>
Site Investigation:	<input type="text"/>
Approximate Amount of Spillage:	<input type="text"/>

Helpful Information When Receiving or Reporting an Illicit Discharge/Connection

- Date report received.
- Name of person reporting and how can they be reached?
- Type of discharge? (mud/oil/concrete/sand/dirt, etc.)
- Characteristics of discharge? (what color/type of odor, etc.)
- Location of discharge? (address, street name, etc.)
- What caused the discharge? (ruptured tank, heavy rain, etc.)
- Approximate amount of discharge? (a lot, a little, a dump truck full, etc.)
- Who discharged the material? (Contractor, trucking company, etc.)
- Is anyone currently working on clean up?

Termination of Illicit Discharges & Connections

- Property owners, who are aware of, are responsible for reporting and correcting problems that lead to illegal discharges or connections.
- Investigations of reported illicit discharges and connections are required to be initiated within 7 days of knowledge.
- Timeline for remedy of illicit discharges is dependant on the type of violation.
- Illicit connections shall be removed within 180-days of identifying the source.
- Failure to remedy an illicit discharge or connection may result in increasingly severe enforcement actions.

Compliance & Corrective Actions For Business Operators & Property Owners

The Public Works Director (PWD) and Code Enforcement should use common sense judgment in mixing compliance assistance and enforcement. Often times business operators and property owners are not aware of the existence of an illicit discharge or connection.

- Voluntary compliance is the preferred method for achieving compliance. Providing the responsible party with information and assistance may be enough to secure voluntary compliance.
- Severity of the violation will govern the timeframe granted, by PWD, to remedy the situation.

Enforcement Measures

When Voluntary Compliance is Not Attained

- Violation Penalty- Per 14.04.170 – Failure to comply may result in a ‘civil monetary penalty not to exceed \$5,000.00/day per violation. Each day of continued violation shall constitute a separate violation for purposes of this penalty.’
- Enforcement Procedure – Per 14.04.180 – “... imposed by the Camas Municipal Court. The Director, his designee, or the City Attorney, shall initiate the process ... All contested proceedings ... shall be heard by the Judge, without a jury, and the burden of proof shall be a preponderance of the evidence.”

Important Things to Remember:

- Floor drains from restaurant kitchens, connected to a storm sewer, are an illicit connection!
 - Muddy water from a construction site of any size, flowing into the storm sewer, is an illicit discharge!
 - Both of these scenarios are prohibited!
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- If you have any questions, contact the Engineering Department.

THE END

The City of Camas would like to thank Snohomish County for the use of their presentation template.



This presentation has been edited and modified from the original.

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