

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



National Pollution Discharge Elimination System
NPDES Phase II Permit Requirement – S5.C.3(f)(i)



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(f)(i).
- Illicit discharges and connections are prohibited, per Camas Municipal Code 14.04.
- Further information can be found in the City's IDDE Program Manual, dated October 2011.

IDDE Program Manual October 2011

The manual in it's
entirety can be found
on the City's website,
Public Works Dept.,
or Camas Library



City of Camas
Illicit Discharge
Detection and Elimination
Program Manual
October, 2011

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.'



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?

It is a Municipal Separate Storm Sewer System (MS4) 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 lack of adequate 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; exception could be Prune Hill! Lot's of springs ...
- Groundwater is crystal clear;
- If it looks/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

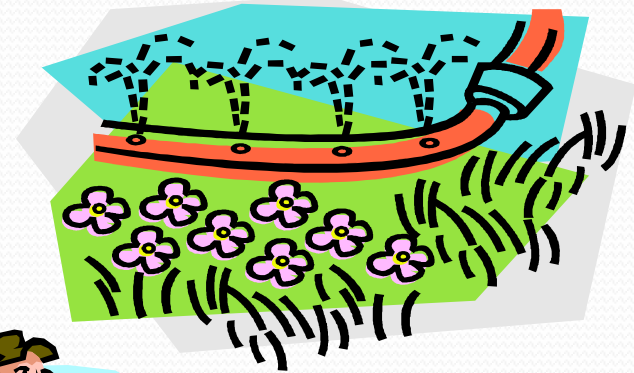
Examples:

- 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 algaecides 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 will, impact Waters of the State ...
 - Call the City's Illicit Hotline at (360) 817-1565. The call will be routed to the appropriate department/staff for response.
 - Calls may also be made directly to Dept. of Ecology Southwest Regional Office at (360) 407-6300.
 - An Illicit Discharge Report form is also available on the City's website at www.ci.cameras.wa.us/index.php/documentcenter. This form can be faxed, emailed, or hand delivered to the City.
- After hours emergency problems, should be reported through 911.

Example of Reporting Form

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

CITY OF CAMAS
ILLICIT 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:

Location of Illicit Discharge:

What Caused Discharge:

Site Investigation:

Approximate Amount of Spillage:



Helpful Information When Receiving a Report of 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.



Compliance & Corrective Actions For NPDES Permit Holders

The following NPDES Permit Holders are held to a more stringent enforcement standard as they are expected to be knowledgeable of the measures required to be in compliance with their permits.

- Construction Stormwater General Permits – regulates stormwater discharges from construction sites of one acre or larger. These are the ‘guys’ building our subdivisions, short plats, etc.
- Industrial General Stormwater Permits – authorizes stormwater discharges associated with industrial activities. These are the Georgia Pacific’s and Wafer Tech’s of the world.
- Voluntary compliance is still the preferred method for achieving compliance. However, a shorter timeframe for compliance will be granted before fines are levied.
- Procedures for enforcement, when voluntary compliance fails, are outlined in the SOP for ‘Enforcement of Erosion and Sediment Control’.

Compliance & Corrective Actions For NPDES Permit Holders- Sample of SOP



STANDARD OPERATING PROCEDURES (SOP) FOR ENFORCEMENT OF EROSION & SEDIMENT CONTROL (ESC)

BACKGROUND

All construction sites that disturb an acre of land, or greater, are subject to the provisions of *Camas Municipal Code '14.06 Erosion and Sediment Control'*. To view the entire code, go to <http://www.ci.camas.wa.us/govern/index.htm> 'Camas Municipal Code Online'. Only portions of the code are printed below:

"14.06.060 General requirements.

- A. **Compliance** with this chapter shall be the joint and several responsibility of both the property owner on whose parcel the land-disturbing activity occurs and the person undertaking such activity. In addition, if the land-disturbing activity concerns a federal, state or city issued permit, the permit holder is also responsible for meeting the requirements of this chapter.
- B. If the BMPs approved and applied to a site are insufficient to prevent sediment from reaching water bodies, adjacent properties, or public rights-of-way, then additional BMPs shall be implemented.
- C. **Maintenance.** All erosion and sediment control BMPs shall be regularly inspected and maintained to ensure continued performance of their intended function. A maintenance log for private facilities shall be provided and kept as a permanent record. The maintenance log shall be in a designated on-site location.
- D. **Idle Construction Sites.** Uncompleted construction sites shall be inspected no less frequently than once a week and after each rainfall and shall be repaired, if needed.

14.06.300 Enforcement.

- B. The severity of enforcement shall generally correspond to the degree of actual or potential impact of erosion and sediment from a site on natural and man-made water bodies, adjacent property, stormwater collection and conveyance systems, and stormwater facilities. The director of public works, or his authorized designee, is directed and authorized to implement and enforce all provisions of this chapter. In enforcing this chapter, the public works director shall have the following duties and powers:
 1. To require the submission of erosion prevention/sediment control plans, and to review and approve such plans;
 2. To inspect all construction activities to assure compliance with the provisions of this chapter;
 3. To issue a stop work order for the site upon notice of any construction activity being conducted in violation of this chapter or in violation of an approved erosion prevention/sediment control plan;
 4. To require any person violating the provisions of this chapter or an approved erosion prevention/sediment control plan to undertake all cleanup, corrective, and any other remedial measures necessary to remedy such violation.
- C. **Enforcement--Stop Work Order.**
 1. The issuance of a stop work order indicates that all work of every type, make and description on the site shall cease, except for erosion prevention/ sediment control measures.
 2. A stop work order will be in effect until such time as the director establishes that all the necessary erosion prevention/ sediment control measures are in place, functioning, and the site is stabilized.
 3. Upon the written request of the person ordered to stop work, the director may authorize the resumption of work on the site prior to completion of all directed mitigation efforts. The director shall only authorize the resumption of work where the aggrieved person is actively pursuing directed mitigation efforts, the resumption of work will not create additional hazards, and the work will in no manner diminish the ability of the aggrieved person to finalize directed mitigation efforts.
- D. **Enforcement--Civil Infraction.**
 1. Any person, firm or corporation which violates any provision of this chapter or which undertakes any construction activity in violation of an approved erosion prevention/sediment control plan as outlined in this chapter or who violates the terms of any stop work order issued pursuant to this chapter, shall be guilty of a civil infraction punishable by a fine of not more than five hundred dollars (\$500) a day. Each separate day or any portion thereof during which any violation occurs or continues constitutes a separate offense.
- E. **Continued Duty to Correct Violation.** Payment of a monetary penalty pursuant to this chapter does not relieve a person of the duty to correct the violation as ordered.



STANDARD OPERATING PROCEDURES (SOP) FOR ENFORCEMENT OF EROSION AND SEDIMENT CONTROL (ESC) (Continued)

Prior to any clearing or grading, a preconstruction meeting is to be held with the Contractor, Property Owner or Representative, City's Project Inspector, and City's Project Engineer. Erosion and sediment control responsibilities, expectations, and steps of enforcement are to be outlined during this meeting. The escalating degrees of enforcement are outlined below:

Step 1: Verbal Reminders. The Contractor will be given a 'verbal' reminder, by the Project Inspector, at the first indication that an ESC measure requires attention. A 'verbal' reminder shall become a written warning if the Inspector's verbal reminders are ignored. Verbal reminders are to be noted in the Inspector's Daily Report (IDR).

Step 2: Issuance of a Written Warning. If after repeated verbal reminders, and depending on the severity of the ESC violation, if the Contractor fails to comply, the Project Inspector will issue a 'written warning' documenting the violation. A copy of the 'written warning' goes to the Contractor, Owner, project file, and the NPDES Permit person. At this point, copies of the IDR noting verbal warnings shall be attached. See example 'Written Warning' form.

Step 3: Issuance of a Stop Work Order. After failure to comply with a 'written warning', a 'Stop Work' order may be issued. Failure to comply with a 'stop work order' may result in monetary fines, as well as 'lost work time'. If applicable, working days are to be counted during a 'stop work' order. Contractor is still required to work on the ESC violations. See example 'Stop Work Order' form.

Step 4: Issuance of a Civil Infraction. Continued violation of steps 1-3 shall result in issuance of a Civil Infraction up to an amount of five hundred (\$500.00) per day, per violation, until the ESC measures are remedied. These shall be issued by the City Attorney.

Typical ESC Measures	
Gravel Construction Entrance w/Fabric	Temporary Slope Stabilization – Seeding/Straw
Inlet Protection – Curb Sediment Traps	Erosion Control Blankets
Inlet Protection – Catch Basin Inserts	Stockpile Stabilization
Fabric Sediment Barriers	Temporary Sediment Traps/Ponds
Straw Wattles – Slope Stabilization	Interceptor Swales
Straw Wattles – Behind Curbs	Check Dams in Interceptor Swales
Surface Roughening – Tracking or Gradient Terraces	Pipe Slope Drains (w/splash pads)

Note: Additional 'outside' notifications of ESC violations/concerns may also come in from other departments, e.g. Police, Street, Code Compliance, Water/Sewer, and citizen reports. These calls are logged on the 'Report of Complaint' Forms and a copy of the form shall be put in the project file. See example 'Report of Complaint' form.



Enforcement Measures

When Voluntary Compliance is Not Attained

- Civil Violation- 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 – 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.”



Wrap Up/Question/Answer

Important things to remember:

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

THE END

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



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