

## 5.0 MCM #2 - Illicit Discharge Detection and Elimination

The Illicit Discharge Detection and Elimination minimum control measure consists of BMPs that focus on the detection and elimination of illicit discharges into the City's MS4. An illicit discharge is defined as "a point source discharge of pollutants to a separate storm drain system which is not composed entirely of stormwater and not authorized by an NPDES permit." The BMPs describe development and update of storm sewer map; the legal authority mechanism (to the extent allowable under State or local law) which will be used to effectively prohibit illicit discharges; enforcement procedures and actions to ensure that the regulatory mechanism is implemented; and programs to detect and eliminate non-stormwater discharges from the City's MS4. BMPs also focus on education and training of public service employees, businesses, and the general public with regard to the hazards associated with illegal discharges and improper disposal of waste as described in the Public Education and Outreach minimum control measure. The City has developed a list of non-stormwater discharges that will not be considered illicit, see section 3.3, List of Allowable Non-Stormwater Discharges.

### 5.1 Regulatory Requirements

#### I. Program Development

Develop, implement and enforce a program to detect, investigate and eliminate illicit discharges into the small MS4. The SWMP must include a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4 system. Elements must include:

- a. An up-to-date MS4 map (see Part III.B.2.(c)(1))
- b. Methods for informing and training MS4 field staff
- c. Procedures for tracing and removing the source of an illicit discharge

#### II. Allowable Non-Stormwater Discharges

Non-stormwater flows listed in Part II.C of the TPDES General Permit do not need to be considered by the MS4 operator as an illicit discharge requiring elimination unless the operator of the MS4 or the TCEQ identifies the flow as a significant source of pollutants to the MS4.

#### III. MS4 Mapping

Maintain an up-to-date MS4 map which must be located on site and available for review by the TCEQ. The MS4 map must show at a minimum the following information:

- a. The location of all small MS4 outfalls that are operated by the City and discharge into the waters of the U.S.
- b. The names and locations of all waters of the U.S. that receive discharges from the outfalls; and
- c. Priority areas identified under Part III.B.2.(e)(1) if applicable.

#### IV. Education and Training

Implement a method for informing or training all of the City field staff that may come into contact with or otherwise observe an illicit discharge or illicit connection to the small MS4 as part of their normal job responsibilities. Training program materials and attendance lists must be maintained on site and made available for review by the TCEQ.

#### V. Public Reporting of Illicit Discharges and Spills

To the extent feasible, publicize and facilitate public reporting of illicit discharges or water quality impacts associated with discharges into or from the small MS4. Provide a central contact point to receive reports, for example by including a phone number for complaints and spill reporting. Develop and maintain on site procedures for responding to and reporting illicit discharges and spills.

#### VI. Source Investigation and Elimination

Minimum Investigation Requirements – Upon becoming aware of an illicit discharge, conduct an investigation to identify and locate the source of such illicit discharge as soon as practicable. The investigation shall include:


- a. Prioritize the investigation of discharges based on their relative risk of pollution. For example sanitary sewage may be considered a high priority discharge.
- b. Report to the TCEQ immediately upon becoming aware of the occurrence of any illicit flows believed to be an immediate threat to human health or the environment.
- c. Track all investigations and document, at a minimum, the date(s) the illicit discharge was observed, the results of the investigation, any follow-up of the investigation and the date the investigation was closed.
- d. If the source of the illicit discharge extends outside the City's jurisdiction, notify the adjacent permitted MS4 operator or TCEQ's Field operations Support division in accordance with Part III.A.3.b
- e. If and when the source of the illicit discharge has been determined, immediately notify the responsible party of the problem, and require the responsible party to perform all necessary corrective actions to eliminate the illicit discharge.

#### VII. Inspections


Conduct inspections, as determined appropriate, in response to complaints, and conduct follow-up inspections as needed to ensure that corrective measures have been implemented by the responsible party.

5.2 Selected Best Management Practices


ID-1 Illicit Discharge Ordinance

ID-1	<b>Illicit Discharge Ordinance</b>	
	<p><b>BMP Description:</b> The City will review and revise, if needed, relevant ordinance(s) to provide authority to: prohibit illicit discharges and illicit connections, respond to and contain other releases, and prohibit dumping or disposal of materials other than stormwater.</p>	
<p><b>Responsible Department</b> GUS Util</p>	<p><b>Target Audience</b></p>	<p>Residents, public service employees, businesses, commercial and industrial facilities</p>
<p><b>Supporting Departments</b>  Legal GUS Env</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	1	Review current ordinances and draft ordinance
	2	Adopt Ordinance
	3	Develop written enforcement procedures
	4	Enforce ordinance
	5	Enforce ordinance


**ID-2 Citizen Complaint Hotline**

ID-2	<b>Citizen Complaint Hotline</b>	
<p>See something suspicious? Call the...</p> <p><b>STORMWATER HOTLINE</b></p>  <p><b>5-STORMY</b></p>	<p><b>BMP Description:</b> The City will develop written procedures for responding to illicit discharge complaints. Create and maintain a complaint hotline database. Begin investigations of complaints as they are received.</p>	
<p><b>Responsible Department</b> GUS Util</p>	<p><b>Target Audience</b></p>	<p>Residents, public service employees, businesses, commercial and industrial facilities</p>
<p><b>Supporting Departments</b></p> <p>Police- Code</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	<p>1</p>	<p>Review current citizen complaint system</p>
	<p>2</p>	<p>Update citizen complaint system</p>
	<p>3</p>	<p>Newsletter, web page or press release and list of complaints</p>
	<p>4</p>	<p>Newsletter, web page or press release and list of complaints</p>
<p>5</p>	<p>Newsletter, web page or press release and list of complaints</p>	


**ID-3 Storm Drain and Outlet Mapping**

ID-3	<b>Storm Drain and Outlet Mapping</b>											
	<p><b>BMP Description:</b> The City will continue to update the City's storm drain map as needed with identification of new, altered, and newly discovered storm drain features.</p>											
<p><b>Responsible Department</b> GUS-Sys. Eng.</p>	<p><b>Target Audience</b></p>	<p>Public service employees</p>										
<p><b>Supporting Departments</b>  Transportation Planning</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p> <table border="1"> <tr> <td data-bbox="506 1171 625 1285">1</td> <td data-bbox="625 1171 1481 1285">Assess mapping needs and evaluate priority watersheds (related to salamander habitat)</td> </tr> <tr> <td data-bbox="506 1285 625 1398">2</td> <td data-bbox="625 1285 1481 1398">Map the Middle Fork San Gabriel River watershed</td> </tr> <tr> <td data-bbox="506 1398 625 1512">3</td> <td data-bbox="625 1398 1481 1512">Update system map; map the North Fork San Gabriel watershed</td> </tr> <tr> <td data-bbox="506 1512 625 1625">4</td> <td data-bbox="625 1512 1481 1625">Update system map; map the South Fork San Gabriel and Smith Branch watersheds</td> </tr> <tr> <td data-bbox="506 1625 625 1740">5</td> <td data-bbox="625 1625 1481 1740">Update system Map; map the Berry Creek watershed</td> </tr> </table>	1	Assess mapping needs and evaluate priority watersheds (related to salamander habitat)	2	Map the Middle Fork San Gabriel River watershed	3	Update system map; map the North Fork San Gabriel watershed	4	Update system map; map the South Fork San Gabriel and Smith Branch watersheds	5	Update system Map; map the Berry Creek watershed
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**ID-4 The Collection Station**

<b>ID-4</b>	<b>The Collection Station</b>	
	<p><b>BMP Description:</b>                  The City will continue operation and advertising of The Collection Station. Refine communication efforts to increase citizen participation in proper disposal. As the storm drain outfalls are mapped in ID-3, the City will also consider appropriateness and need of adding remote drop off locations (e.g. oil igloos) for used motor oil collection to encourage greater compliance.</p>	
<p><b>Responsible Department</b> GUS-Env.</p>	<p><b>Target Audience</b></p>	<p>Residents</p>
<p><b>Supporting Departments</b>  Public Comm</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	<p><b>1</b></p>	<p>Continue program with quarterly reports</p>
	<p><b>2</b></p>	<p>Continue program with quarterly reports Assess need for additional oil collection alternatives in Middle Fork and San Gabriel River Watersheds</p>
	<p><b>3</b></p>	<p>Continue program with quarterly reports Assess need for additional oil collection alternatives in North Fork San Gabriel Watersheds</p>
	<p><b>4</b></p>	<p>Continue program with quarterly reports Assess need for additional oil collection alternatives in South Fork San Gabriel and Smith Branch Watersheds</p>
<p><b>5</b></p>	<p>Continue program with quarterly reports Assess need for additional oil collection alternatives in Berry Creek Watershed</p>	

**ID-5 Staff IDDE Education**


<b>ID-5</b>	<b>Staff IDDE Education</b>	
	<p><b>BMP Description:</b> The City will provide education on elimination and detection for illicit discharge and dumping issues.</p>	
<p><b>Responsible Department</b> GUS Util</p>	<p><b>Target Audience</b></p>	<p>Public Service Employees</p>
<p><b>Supporting Departments</b>  Human Resources</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	<p><b>1</b></p>	<p>Develop training materials</p>
	<p><b>2</b></p>	<p>1 training per Department, list of attendees / dates</p>
	<p><b>3</b></p>	<p>1 training for new employees, list of attendees / dates</p>
	<p><b>4</b></p>	<p>1 training for new employees, list of attendees / dates</p>
<p><b>5</b></p>	<p>1 training for new employees, list of attendees / dates</p>	

**ID-6 Illicit Discharge Investigations**

ID-6	<b>Illicit Discharge Investigations</b>	
	<p><b>BMP Description:</b> The City will develop procedures to trace the source of an illicit discharge, eliminate the source, and conduct follow-up investigations after the illicit discharge has been eliminated.</p>	
<p><b>Responsible Department</b> GUS Util</p>	<p><b>Target Audience</b></p>	<p>Residents, public service employees, businesses, commercial and industrial facilities</p>
<p><b>Supporting Departments</b>  Police-Code GUS Env</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	<p><b>1</b></p>	<p>List of investigation types and locations</p>
	<p><b>2</b></p>	<p>List of investigation types and locations</p>
	<p><b>3</b></p>	<p>List of investigation types and locations</p>
	<p><b>4</b></p>	<p>List of investigation types and locations</p>
<p><b>5</b></p>	<p>List of investigation types and locations</p>	



**ID-7 Sanitary Sewer System Cleaning**

<b>ID-7</b>	<b>Sanitary Sewer System Cleaning</b>	
	<p><b>BMP Description:</b> The City will continue to clean the sanitary sewer collection system</p>	
<p><b>Responsible Department</b> GUS Util</p>	<p><b>Target Audience</b></p>	<p>Public service employees</p>
<p><b>Supporting Departments</b></p> <p>none</p>	<p><b>Year</b></p>	<p><b>Measurable Goal</b></p>
	<p>1</p>	<p>Clean 30,000 feet of sanitary sewer</p>
	<p>2</p>	<p>Clean 30,000 feet of sanitary sewer</p>
	<p>3</p>	<p>Clean 30,000 feet of sanitary sewer</p>
	<p>4</p>	<p>Clean 30,000 feet of sanitary sewer</p>
	<p>5</p>	<p>Clean 30,000 feet of sanitary sewer</p>