



City of Arnold
Illicit Discharge Detection and
Elimination Plan
And
Spill Response
Standard Operating Procedure
2017

City of Arnold
Illicit Discharge Detection and Elimination Plan (IDDE)

1. INTRODUCTION

This Illicit Discharge Detection and Elimination Plan (IDDE) was developed using the model plan drafted by incorporating other municipality standards.

2. PURPOSE

The intent of this plan is to identify procedures for:

- a. Location of priority areas likely to have illicit discharges
- b. Tracing and removing sources of illicit discharges
- c. Developing standard operating procedures for spill response and enforcement

All activities will be conducted in a manner pursuant to and consistent with the Federal Clean Water Act and any applicable State and local regulations to the maximum extent practicable.

As mandated in Federal Phase II Stormwater Discharge Regulation: CCR 61.8(11)(a)(ii)(C) (Appendix A) this plan has been created for Arnold's municipal separate storm sewer systems (MS4s).

Ordinance

The City of Arnold Stormwater-Illicit Discharge Ordinance Article VI Illicit connection and Discharge To Storm Drain System.

- a. To regulate the contribution of pollutants to the municipal separate storm sewer system (MS4) by stormwater discharges by any user;
- b. To prohibit Illicit Connections and Discharges to the municipal separate storm sewer system;
- c. To establish legal authority to carry out all inspection, surveillance and monitoring procedures necessary to ensure compliance with this ordinance; and
- d. To promote public awareness of the hazards involved in the improper discharge of trash, yard waste, lawn chemicals, pet waste, wastewater, grease, oil, petroleum products, cleaning products, paint products, hazardous waste, sediment and other pollutants into the storm drainage system.

3. PROHIBITED DISCHARGES.

Prohibited discharges to MS4s are outlined in the City Code of Ordinances Article VI Illicit Connection and Discharge To Storm Drain System.

Sec. 24-138.- Discharge prohibitions.

a) *Prohibition of illegal discharges.*

(1) No person shall discharge or cause to be discharged into the municipal storm drain system or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater.

(2) The commencement, conduct or continuance of any illegal discharge to the storm drain system is prohibited except as described as follows:

(3) The following discharges are exempt from discharge prohibitions established by this article: water line flushing or other potable water sources, landscape irrigation or lawn watering, diverted stream flows, rising ground water, ground water infiltration to storm drains, uncontaminated pumped ground water, foundation or footing drains (not including active groundwater dewatering systems), crawl space pumps, air conditioning condensation, springs, noncommercial washing of vehicles, natural riparian habitat or wet-land flows, swimming pools (if dechlorinated-typically less than one (1) PPM chlorine), firefighting activities, and any other water source not containing Pollutants.

(4) Discharges specified in writing by the authorized enforcement agency as being necessary to protect public health and safety.

(5) Dye testing is an allowable discharge, but requires a verbal notification to the authorized enforcement agency prior to the time of the test.

(6) The prohibition shall not apply to any non-stormwater discharge permitted under an NPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the federal Environmental Protection Agency, provided that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the storm drain system.

b) *Prohibition of illicit connections.*

(1) The construction, use maintenance or continued existence of illicit connections to the storm drain system is prohibited.

(2) This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under the law or practices applicable or prevailing at the time of connection.

(3) A person is considered to be in violation of this article if the person connects a line conveying sewage to the MS4, or allows such a connection to continue.

4. LOCATION OF PRIORITY AREAS

Outfall Inventory

A comprehensive field survey of outfall locations was conducted in 2012/2013 with the City's stormwater consultant (Intuition and Logic) continuing to update our City's Outfall Map as they undertake the yearly 20% outfall inspections as required by the state operating stormwater permit. In addition, the City's stormwater department continues to work on the task to completing the City's Stormwater Facilities Map to show the locations of all storm sewer structures and piping locations.

Intuition and Logic provides the City with reports of their findings of outfall inspections. Dry weather flow outfall testing provides detection of:

Chlorine	Nitrogen
Conductivity	PH
Dissolved Oxygen	Phosphorus
E. Coli	Potassium
N. Ammonia	Surfactants-Anionics
Turbidity	

Storm Sewer Maintenance Activities

In addition to the outfall inventory, a number of storm sewer maintenance activities are intended to identify illicit discharges and illegal connections. These include:

1. Storm Sewer Inlet cleanout of accumulated debris or blockage.
2. Continue with storm inlet medallion glue down or manhole lid replacement with embossed labeling "No Dumping-Drains to Stream".

4.1 Area Prioritization

On-going monitoring for illicit discharges focuses on areas based on available water quality information, and past and future complaint history plus the public works staff keeping a visual for illicit discharges.

5. TRACING SOURCES OF ILLICIT DISCHARGES

Tracing the sources of illicit discharges and eliminating the sources includes the following activities:

- Response and Investigation
- Enforcement
- Clean-up

These activities are detailed in the Spill Enforcement and Response Standard Operating Procedures.

6. EDUCATION AND OUTREACH

IDDE educational plans and informational campaigns will be incorporated into the IDDE activities using existing programs (public education, possible household hazardous waste disposal programs, watering and fertilizing campaigns, etc.) Forums that may be utilized for these purposes include the City of Arnold website, Clean Stream events, Press releases and other municipal employee education.

7. BI-ANNUAL REPORTING AND PROGRAM EVALUATION

The city's stormwater discharge permit requires the submittal of a bi-annual report that includes the type of enforcement action taken where and when required for illicit discharge detention and spill response actions occur.

APPENDIX A

ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section of the document offers general guidance on how to detect illicit discharges and comply with the minimum control measure. MS4 operators have a wide range of flexibility in choosing how to satisfy the minimum control measure based upon their unique conditions and resources. An illicit discharge is defined by the permit as any discharge to an MS4 that is not composed entirely of stormwater, and has not been authorized under a discharge permit issued by the State of Missouri. Illicit discharges enter the system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drains) or indirect connections (e.g., infiltration into the MS4 from cracked sanitary systems, spills collected by drain outlets, or paint or used oil dumped directly into a drain). The result is untreated discharges. Examples of sources of illicit discharges, as well as some non-stormwater discharges that may be an exception to the illicit discharge requirements, are listed in section B, below. Illicit discharges may be continuous or intermittent. Intermittent discharges tend to occur when carried by a storm event, while continuous illicit discharges often flow during dry weather.

A. Benefits of an Illicit Discharge Detection and Elimination Program

Illicit discharges can result in untreated discharges that contribute high levels of pollutants, including heavy metals, toxics, oil and grease, solvents, nutrients, viruses, and bacteria, to receiving water bodies. Pollutant levels from these illicit discharges have been shown in EPA studies to be high enough to significantly degrade receiving water quality and threaten aquatic life, wildlife, and human health.

B. Program Requirements

The regulation (CCR 61.8(11) (a) (ii) (C)) is as follows:

(C) The permittee must develop, implement and enforce a program to detect and eliminate illicit discharge (as defined at 61.2) into the permittee's MS4. The permittee must:

(a) Develop, if not already completed, a storm sewer system map, showing the location of all municipal storm sewer outfalls and the names and location of all state waters that receive discharges from those outfalls;

(b) To the extent allowable under State or local law, effectively prohibit, through ordinance or other regulatory mechanism, non-stormwater discharges into the storm sewer system, and implement appropriate enforcement procedures and actions; and

(c) Develop and implement a plan to detect and address non-stormwater discharges, including illicit discharges and illegal dumping, to the system. The plan must include the following three components: procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; and procedures for removing the source of the discharge.

a. Municipal Stormwater Outfalls and State Waters

The regulation requires that the map include the location of each municipal stormwater outfall, and the subsequent state waters for each outfall. To identify the stormwater outfalls and the state waters within each jurisdiction, it is important to understand the definition of each.

A municipal stormwater outfall means a point source “at the point where a municipal separate storm sewer discharges to state waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other state waters and are used to convey state waters.” For purposes of this guidance and when discussing the Illicit Discharge Detection and Elimination Minimum Control Measure, it is assumed that a municipal stormwater outfall is the same as the storm sewer outfall. Because a municipal stormwater outfall has been defined as the point where a municipal separate storm sewer discharges to state waters, it is also important to understand what are state waters, is “any and all surface and subsurface waters which are contained in or flow in or through this State, but does not include waters in sewage systems, waters in treatment works of disposal systems, waters in potable water distribution systems, and all water withdrawn for use and treatment until use and treatment have been completed.” Therefore, most surface water is considered state waters, including canals, ditches and man-made conveyance structures. State waters may be categorized as “classified” or “unclassified.” Classified state waters are listed and determined by the Missouri Department on Natural Resources. Classified state waters, by definition, exempt “waters in ditches and other manmade conveyance structures.” Because water quality standards are not applied, waters in ditches and other man-made conveyance structures are considered “unclassified” state waters. For the purposes of the Phase II Stormwater Regulations, Illicit Discharge Detection and Elimination Control Measure, the permittee must map the municipal stormwater outfalls that discharge to both classified state waters and unclassified state waters (irrigation ditches, canals, and other man-made diversions where that may apply).

C. Connections to the Storm Water Utility System

- a) Connections by Authorized Personnel. No person not authorized by the Public Works Director shall tap or connect to any part of the storm water system.
- b) Connections Made in Compliance with Approval. No person shall fail to make authorized connections to the storm water in accordance with the terms and conditions of the permit or approval issued therefore and the City of Arnold Design and Construction-Standards.
- c) Costs of Connection. No person requesting or required to make connections to the storm water system shall fail to pay the costs for such connection that may apply.
- d) Prohibited Connections. No person shall make, maintain, or use any illicit connection to the city’s storm water system.

D. Discharges to the Storm Water System.

D. Discharges to the Storm Water System.

- a. Discharges Prohibited. No user or other person shall discharge any sewage, other polluted waters, or other deleterious substance from any premises within the city into or upon any public highway, street, sidewalk, alley, land, public place, stream, ditch, or other watercourse or into any cesspool, storm or private sewer, or natural water outlet, except where suitable treatment has been provided in accordance with provisions of applicable federal, state, and local laws.
- b. Cleaning of Hard Surfaces. The owner of any paved parking lot, street or drive shall clean the pavement as necessary to prevent the buildup and discharge of pollutants. Paved surfaces shall be cleaned by dry sweeping, wet vacuum sweeping, collection and treatment of wash water or other methods in compliance with this chapter, or other applicable federal, state, and local laws.
- c. Material Storage. No person shall store materials including, without limitation, stockpiles used in construction and landscaping activities, in a manner which may cause discharge or threatened discharges of pollutants into the storm sewer system or receiving water.
- d. Exemptions. The following discharges are exempt from the discharge permit requirements established by this chapter:
 - (1) Landscape irrigation and lawn watering associated with single family detached or duplex development, uncontaminated groundwater from an individual single family residential detached or duplex foundation drainage system, individual residential car washing of less than two consecutive days in duration for charity or non-profit fundraising, dechlorinated swimming pool discharges, water line and fire hydrant flushing, fire-fighting activities, or street cleaning operations conducted by the city; or
 - (2) Any discharge that is authorized by the Public Works Director.

SPILL ENFORCEMENT AND RESPONSE STANDARD OPERATING PROCEDURES

Purpose: The purpose of this section is to outline the city of Arnold's Spill Enforcement and Response Procedures. These procedures include the following activities:

- Response and Investigation
- Enforcement
- Clean- up

EMERGENCY RESPONSE - hazardous or unknown material incident

The Rock Community Fire District and the City of Arnold Police Department are the principal agencies, which respond to spills of hazardous materials. These agencies are the designated emergency response agencies and are responsible for providing and maintaining the capability for emergency response to a hazardous substance incident occurring within its jurisdiction. In addition, the Jefferson County Homeland Security Emergency Response Team provides assistance when required.

EMERGENCIES (Hazardous and Unknown Materials)

Primary Response

Response by : Rock Community Fire Protection District / Arnold Police Department
3749 Telegraph Road
Arnold, MO 63010
636-296-2211

- Identifies nature of the spill, isolates, and contains hazardous materials within capabilities.
- Assesses area of contamination and public safety.
- Decontaminates individuals (on site) exposed to hazardous materials.
- Handles rescue operations and transmit information to assisting units.
- Provide traffic control and resident notification.

Arnold Public Works Department

- Assist in response in spill containment
- Assist in environmental impact assessment
- Assist recovery
- Assist in enforcement activities
- Coordinate with Environmental Contractor (Clean Harbors Company).

Environmental Contractor (Clean Harbors Company) 1-800-645-8265

Can provide spill, containment, and clean-up services for spill response, chemical hazards, biological and infectious agent response, natural disasters, field investigations, & laboratory services. All OSHA trained and certified employees.

INVESTIGATIONS

Source Identification

Some of the methods to be included in this source location are listed below:

- Use of storm sewer outfall maps to trace suspected discharges to a point of origin;
- Use of water quality data to determine sources of detected chemicals, and trace them upstream;
- On-the-ground physical investigation of outfalls and storm sewer inputs or evidence of prohibited discharges (discoloration of ground, odors, leaky containers, flowing water during dry periods, etc.);
- Dye-testing to delineate potential source areas;
- Smoke tests to delineate potential source areas;
- Collect samples of the discharge and of potential sources of the discharge, and comparing the chemical analysis results;
- TV or video-taping storm sewers; and
- Recruiting public involvement to report illicit discharges.

Documenting Source Investigations

The report will include incident location, incident type, date, responsible party, business type, enforcement action, and resolution.

Environmental Damage Assessment

Environmental consulting services may be contracted to determine water quality impact of spills released to the environment.

Sampling for Laboratory Analysis

In some situations (e.g. for enforcement, etc.) samples may need to be collected for laboratory analysis. In these cases, sample collection is conducted according to applicable evidence sampling collection protocols.

ENFORCEMENT-(Refer to City Code of Ordinances Article VI)

Fire Department/Hazmat Team (for emergency and toxic spills and Police Department)

- Notifies other government agencies for potential violations of federal, state and local regulations.

City Staff

- Issues Compliance Directive or Notice of Violations
- Conducts follow-up inspections to insure compliance with directives

- Distributes brochures, door hangers and other information for proper disposal on non-stormwater materials.
- Insures that the individual who reported the illicit discharge is followed up with commendation.

Enforcement Options (Refer to City Code of Ordinances Article VI)

More serious violations, or situations where a reasonable attempt has been made to educate a responsible party, but compliance has not been achieved, may require a more aggressive and enforcement-oriented approach. Enforcement approaches and actions should be based on several factors including the severity of the violation (environmental health threat), site-specific circumstances, and past compliance history. The following outlines enforcement options:

Compliance Directive (see Sample A)

Immediately upon identification of an illegal discharge or threatened discharge the inspector may issue a Compliance Directive to the responsible entity. The Directive orders cessation of the discharge and clean-up of any remaining problem by a time certain, typically within several hours. If the responsible party is not cooperative or if criminal sanctions may be appropriate, police or other enforcement assistance is immediately requested and a citation requiring court appearance is issued.

Notice of Violation (see Sample B)

After the field situation is stabilized and the immediate threat abated, a Notice of Violation (NOV) is typically issued to the responsible party, business owner, and landowner (if different). The NOV should contain:

- 1) The name and address of alleged violator;
- 2) The address when available of a description of the building, structure or land upon which the violation(s) is occurring, or has occurred;
- 3) A statement specifying the nature of the violation;
- 4) A warning with respect to further violations;
- 5) A description of the remedial measures necessary to restore compliance and a time schedule for the completion of such remedial action; and
- 6) A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed.
- 7) A statement that the determination of violation may be appealed to the [local enforcement authority] by filing a written notice of appeal within **10** days of service of the violation;

Such notice may require without limitation:

- 1) The performance of monitoring, analyses, and reporting;
- 2) The elimination of illicit connections or discharges;
- 3) That violating discharges, practices, or operations shall cease and desist;
- 4) The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; and
- 5) Payment of a fine to cover administrative and remediation costs; and

6) The implementation of source control or treatment BMPs.

If abatement of a violation and/or restoration of affected property is required, the notice shall set forth a deadline within which such remediation or restoration must be completed. Said notice shall further advise that, should the violator fail to remediate or restore within the established deadline, the work will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

The Notice of Violation typically follows the incident by several days allowing time for the city staff to determine the effectiveness of the actions taken in the field and the extent to which other measures will be needed to prevent reoccurrence.

Citation / Summons

In the case of egregious or repeated violations, a code enforcement officer may issue a summons / complaint. Authority for enforcement of illicit discharges and illegal connections found in the City Code of Ordinances Article VI.

CLEAN-UP AND COST RECOVERY

The responsible party is responsible to remove and clean-up discharged materials from the city or public property (such as gutters, storm drains and creeks). If the responsible party fails to remove and clean-up materials, the City's environmental contractor entity must conduct the work, and the responsible party will be billed by the city for time and materials. This billing procedure is conducted separately from any penalty action taken.

Examples of Non-Hazardous or Threatened Discharges

Non-emergency calls typically involve illicit discharges that are made up of:

1. Trash.
2. Yard waste.
3. Landscaping materials.
4. Pet waste.
5. Cleaning products.
6. Sediment.
7. Illicit discharges from toilets, sinks, industrial processes, cooling systems, or boilers.
8. Fabric cleaning.
9. Equipment cleaning.
10. Commercial vehicle cleaning.
11. Construction activities including but not limited to; painting, paving, concrete placement, saw-cutting, and grading.
12. Existence of illicit connections to the storm drain system.
13. Any material deposited in such a manner or location as to constitute a threatened discharge into storm drains, gutters or waters of the state.

A “threatened discharge” is a condition creating a substantial probability of harm, when the probability and potential extent of harm make it reasonably necessary to take immediate action to prevent, reduce or mitigate damages to persons, property or natural resources.

Domestic or industrial wastes that are no longer contained in a pipe, tank or other container are considered to be threatened discharges unless

they are actively being cleaned up.

14. Any maliciously destroyed or interfered with stormwater pollution prevention BMP.

15. Any watercourse that is not free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse.

16. Any visible buildup of mechanical fluid, waste materials, sediment or debris.

17. Mobile cleaning operations discharging to the storm drainage system.

18. Any leak or spill related to equipment maintenance in an outdoor, uncovered area.

19. Any vehicles, machinery and equipment leaking fluids.

20. Materials stored to as to potentially release pollutants

EXAMPLES OF PROHIBITED DISCHARGES

Sanitary wastewater

Sanitary wastewater (usually untreated) from improper sewerage connections, exfiltration, or leakage

Effluent from improperly operating or improperly designed septic tanks

Overflows of sanitary sewerage systems

Automobile maintenance and operation

Commercial car wash wastewaters

Radiator flushing wastewaters

Engine degreasing wastes

Improper oil disposal

Leaky underground storage tanks

Landscape irrigation sources

Direct spraying of fertilizers, pesticides or herbicides onto impervious surfaces

Over - application of fertilizers, pesticides or herbicides onto landscaping

Other sources

Laundry wastes

Non- contact cooling waters

Metal plating baths

Dewatering of construction sites

Washing of concrete ready- mix trucks

Contaminated sump pump discharges

Improper disposal of household toxic wastes

Spills from roadway and other accidents

Chemical, hazardous materials, garbage, and sanitary sludge landfills and disposal sites

Discharges not prohibited

Landscape irrigation

Lawn watering

Diverted stream flows

Irrigation return flow

Rising ground waters

Uncontaminated ground water infiltration {as defined at 40 CFR 35.2005(20)}

Uncontaminated pumped ground water

Springs

Flows from riparian habitats and wetlands

Water line flushing

Discharges from potable water sources

Foundation drains

Air conditioning condensation

Water from crawl space pumps

Footing drains

Individual residential car washing

Dechlorinated swimming pool discharges

Street wash water

City of Arnold
Compliance Directive (Sample A)

No person shall discharge or cause to be discharged into the municipal separate storm sewer system (MS4) or watercourses any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater.

It is unlawful to cause materials to be deposited in such a manner or location as to constitute a threatened discharge into storm drains, gutters or waters of the State. Materials that are no longer contained in a pipe, tank or other container are considered to be threatened discharges unless they are actively being cleaned up.

It has been noted that following is a pollutant contained in a threatened or actual discharge to the municipal separate storm sewer system:

- paints, varnishes, and solvents;
- oil and other automotive fluids;
- non- hazardous liquid and solid wastes;
- yard wastes;
- trash, refuse, rubbish, garbage;
- food waste;
- litter;
- oil and grease;
- cleaning products;
- pesticides, herbicides, and fertilizers;
- landscaping materials;
- hazardous substances and wastes;
- sewage, fecal coliform and pathogens;
- dissolved and particulate metals;
- animal wastes;
- wastes and residues from construction activities including but not limited to, painting, paving, concrete placement, saw-cutting, and grading;
- wastes and residues that result from mobile washing operations;
- discharges from toilets; sinks; industrial processes; cooling systems; boilers;
- fabric cleaning; equipment cleaning; commercial vehicle cleaning;
- substances added to the storm drain to control root growth
- noxious or offensive matter of any kind.

Other: _____

Location: _____

You are required to immediately remedy the situation.

A follow up inspection will be performed on

Received

by: _____ (signature) _____ (address) _____ (phone)

City of Arnold
Notice of Violation (Sample B)

Date

Name
Address
City

Subject: Illegal or Threatened Discharge to Municipal Separate Storm Sewer System

The City of Arnold alleges that **Name** has violated certain provisions of the Stormwater - Illicit Discharge Ordinance [Article VI]. The specific allegation is a violation of [Article VI] which indicates:

No person shall release or cause to be released into the municipal separate storm sewer system (MS4) or watercourses any discharge that is not composed entirely of uncontaminated stormwater .

This allegation is outline in the table below:

Date	Location	Violation
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On Date your employee, Name, was seen

After Name was notified of this violation

At this time, we find it necessary to require that *you instruct all your employees on the appropriate procedures for* _____.

Please contact Arnold Public Works Department for guidance in this matter.

This allegation maybe appealed to the [Public Works Director] by filing written notice of appeal within 10 days of service of this violation.

Failure to comply with this Notice or future violations may result in further enforcement action by the [City of Arnold]. Violations of this ordinance may result in fines of up to \$500.00 per incident, or incarceration for up to 90 days, or both.

Water that enters the storm drain system flows directly into local streams and lakes without treatment. Therefore, any pollutant s in these waters could have adverse effects on water quality, fish and other aquatic life.

Please contact Arnold Public Works at 636-282-2386 if you have any questions.

Sincerely,

City of Arnold Public Works

Illicit Discharge Reporting Form

Incident ID:	
Responder Information	
Report taken by:	Report Date:
Department:	Report Time:
Rainfall in past 24-48 hrs:	
Reporter Information	
Incident Time:	Incident Date:
Caller contact information:	
Name:	Phone:
Street Address:	Email:
Other Notes:	
Incident Location	
Tax Map #:	Northern/ Easting:
Stream (HUC) Address or Outfall #:	
Closest Street Address:	Nearby Landmark:
Primary Location Description	Secondary Location Description
<input type="checkbox"/> Stream Corridor (<i>up or adjacent to stream</i>)	<input type="checkbox"/> Outfall
<input type="checkbox"/> Upland Area (<i>and not adjacent to stream</i>)	<input type="checkbox"/> Near Storm Drain
	<input type="checkbox"/> In-stream flow
	<input type="checkbox"/> Along banks
	<input type="checkbox"/> Near other water source (stormwater pond, wetland etc):
Narrative description of location:	
Upland Problem Indicator Description	
<input type="checkbox"/> Dumping	<input type="checkbox"/> Oil/solvents/chemicals
<input type="checkbox"/> Wash water, suds, etc.	<input type="checkbox"/> Sewage
	<input type="checkbox"/> Other:
Stream Corridor Problem Indicator Description	
Odor	Appearance
<input type="checkbox"/> None	<input type="checkbox"/> "Normal"
<input type="checkbox"/> Sulfide (rotten eggs, natural gas)	<input type="checkbox"/> Cloudy
<input type="checkbox"/> Petroleum (gas)	<input type="checkbox"/> Other: Describe in narrative section
<input type="checkbox"/> Sewage	<input type="checkbox"/> Oil Sheen
<input type="checkbox"/> Rancid/Sour	<input type="checkbox"/> Suds
<input type="checkbox"/> Other	
Floatables	
<input type="checkbox"/> None	<input type="checkbox"/> Algae
<input type="checkbox"/> Sewage	<input type="checkbox"/> Dead fish
	<input type="checkbox"/> Other
Narrative description of problem indicators:	
Suspected Violator (name, personal or vehicle description, license plate #, address, etc.):	
Investigation Information	
Lead Investigator:	<input type="checkbox"/> Closed
Date Closed:	Closed by:
Summarize Resolution :	

INSTRUCTIONS TO COMPLETE ILLICIT DISCHARGE (PID) REPORTING FORM

WHAT IS AN ILLICIT DISCHARGE:

An illicit discharge is any discharge into the highway storm sewer system that is not composed entirely of stormwater. Examples:

- Dry weather discharges of wastewater into the storm sewer system from illegal dumping; spills and other non-stormwater pollution sources
- Discharges of pollutants, contaminants or illicit materials into storm drainage/sewer systems (oil, grease, solvents, metals, nutrients, toxics, viruses, bacteria)
- Improper antifreeze, oil disposal from vehicle maintenance, service stations
- Vehicle washing wastewaters
- Autobody/repair facility waste waters
- Plating shop waste water
- Manufacturers waste water
- Private service agencies waste water
- Wholesale/retail est. waste water
- Sanitary wastewater/connections
- Mobile rug cleaning waste dumping
- Laundry waste waters
- Disposal of auto/household toxics
- Vehicular/accidental spills
- Dairy barn waste waters
- On-lot disposal system- sewage effluent.

WHAT IS NOT AN ILLICIT DISCHARGE:

The following non-stormwater discharges are not illicit discharges:

- Discharges from firefighting activities
- Potable water sources including dechlorinated waterline and fire hydrant flushings
- Irrigation drainage
- Lawn watering
- Water from individual residential car washing
- Dechlorinated swimming pool discharges
- Water from crawl space pumps
- Uncontaminated water from foundation or footing drains
- Routine external building wash down which does not use detergents or other compounds
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless spilled material has been removed) and where detergents are not use
- Air conditioning condensate
- Springs
- Uncontaminated groundwater

(1.) Property Owner Information:

Determine property owners name, if available, and street address of the discharge source in the event that follow-up action or elimination is required. If unable to determine owner, write in "undetermined".

(2.) Description of Discharge for source identification/verification.

a. **Odor:** Determine which odors apply.

b. **Clarity:** How clear is the discharge?

c. **Color:** Discharge color and colors in swale, pipe, ditch, etc.(Document if red/green deficient)

d. **Solids/Floatables:** Identify indicators of source.

Description of Solids/Floatables: • Iron vs. Oil Sheens:

Iron leaches from soils forming a breakable sheen on stagnant water surfaces when poked with a stick. Oil sheens will conform around and coat the surface of the stick.