



**Illegal Discharge/Illicit Connection Program**

**Management Training**

**Module B-10.I**



**Audience: Managers**  
**Time: 2-3 Hours**





**Illegal Discharge/Illicit Connection Program**

**Management Training**

Name  
Affiliation  
Location  
Date



**Introduction**



*Introduction*

**Water Resources are Crucial to Orange County**



Water provides recreation for Orange County residents.

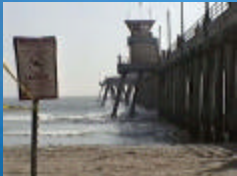


It attracts tourists, boosting the local economy.

It is home to many types of wildlife.

*Introduction*

**Potential Impacts**



- Urban runoff and stormwater pollution can impact the ocean, beaches and creeks, harming wildlife and impairing peoples' ability to enjoy the water.

*Introduction*

**Sources of Pollution**


- Homes
- Businesses
- Construction sites
- Municipal facilities



Introduction

## Path of Pollutants

- Potential pollutants may run off driveways, streets and gutters into stormdrains.
- The stormdrains lead to creeks and rivers, where pollutants can flow untreated into the ocean.




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Introduction

## It's Everyone's Responsibility

- Urban runoff and stormwater pollution is not just a coastal issue-it starts in all regions of the community and affects water quality from the mountains to the ocean.



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Introduction

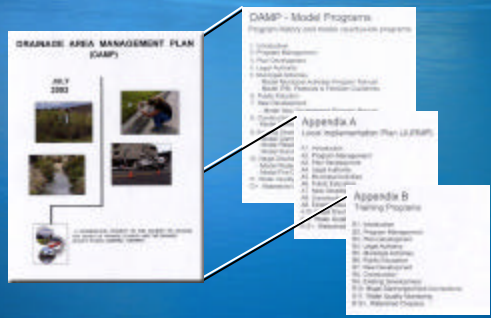
## It's Your Responsibility

- Everyone must help to reduce urban runoff and stormwater pollution.
- This training will help explain what you can do while conducting ID/IC activities to help implement the Orange County Stormwater Program.

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Introduction

## OC Stormwater Program




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Introduction

## Regional Board Boundaries within Orange County

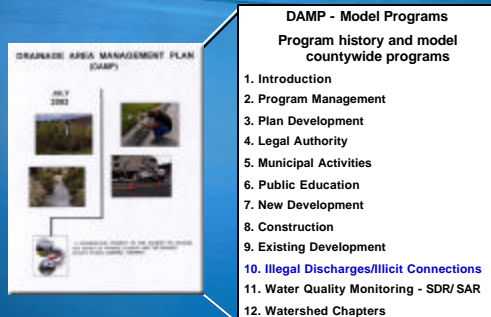
Region	Watershed	Identifier
Region 8 Santa Ana	CoyoteCreek	A
	Carbon Canyon	B
	Westminster	C
	Talbert	D
	Santa Ana River	E
	San Diego Creek	F
	Newport Bay	G
	Los Trancos / Muddy Creek	H
Region 9 San Diego	Laguna Canyon	I
	Aliso Creek	J
	Salt Creek	K
	San Juan Creek	L
	Prima Deshecha & Segunda Deshecha	M



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Introduction

## Program Elements



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*Introduction*

## Training Modules

Program Management	Authorized Inspectors
Sewage Agency	Emergency Response

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*Introduction*

## Training Outline

- Program Introduction
- Program Administration and Implementation
- Detection of Illegal Discharges and Illicit Connections
- Model Spill Response Procedures
- Model Sewage Spill Response Procedures -Break-
- Illicit Connection Investigations
- Education and Enforcement
- Training and Outreach
- Program Effectiveness Assessment

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*Introduction*

## Training Goals

- Overview of ID/IC Program Elements
- Support compliance with Santa Ana and San Diego Regional Board Municipal Stormwater permits
- Ensure effective program implementation

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*Introduction*

## Overall Approach

Identify ID/IC

Respond / Investigate

Enforce

Cleaner Water

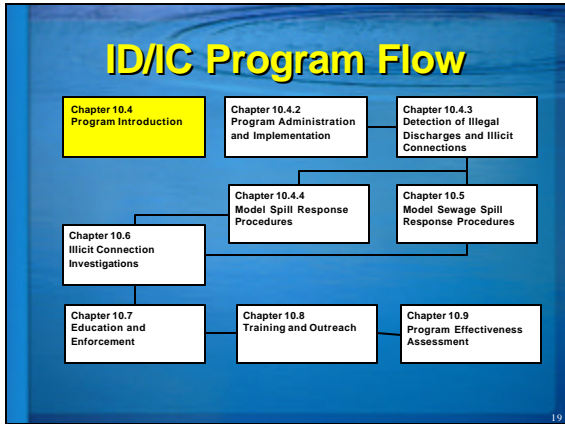
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## Questions ?

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## Program Introduction

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*Program Introduction*

## Key Terms

- An illegal discharge is any discharge to the municipal storm drain system not composed entirely of stormwater and not covered by an NPDES permit.




**Continued...**

*Program Introduction*

## Key Terms (Continued)

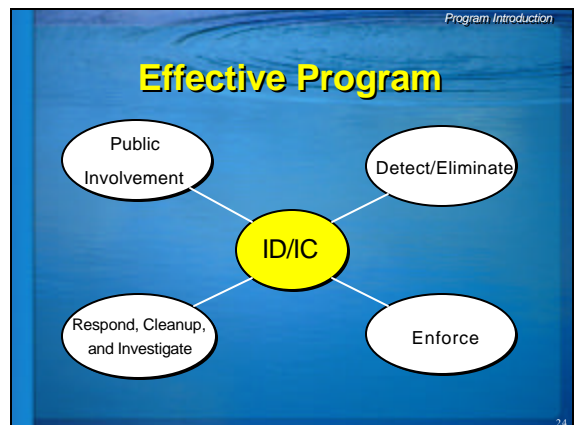
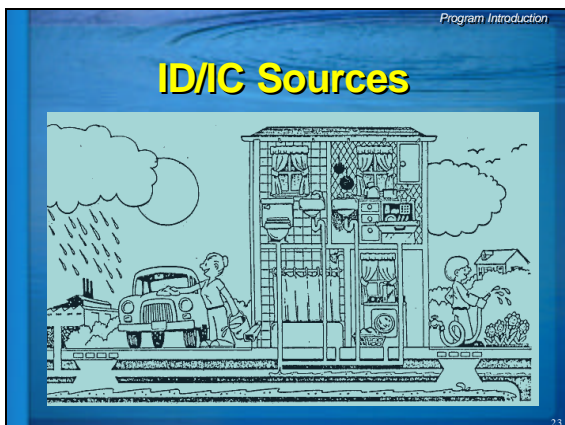
- An illicit connection is an undocumented and/or un-permitted physical connection from a facility to the municipal storm drain system.



*Program Introduction*

## Key Message

- Water pollution degrades surface waters
- ID/ICs are sources of contamination
- Investigation identifies sources
- Enforcement reduces ID/ICs



Program Introduction

## Permit Requirements

- Section 10 of the 2003 DAMP
- Section III and VII of the Santa Ana Regional Board Municipal Stormwater Permit
- Section B.1 and F.5 of the San Diego Regional Board Municipal Stormwater Permit

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Program Introduction

## Program Development and History

- First and Second Term Permits
  - Required facility inspection and documentation
  - Permittees certified reconnaissance
  - Reconnaissance Survey Report, February 1997
  - Water Quality Ordinance adopted, 1997
- Third Term Permit
  - Continue implementing ID/IC program
  - Modify ID/IC program as necessary to reduce pollutants in stormwater discharges

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Program Introduction

## Permittee's Legal Authority

- Permit requirement
- Based on 1997 Model Ordinance
- Enforcement Consistency Guide (ECG) provides consistent approach

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Program Introduction

## ID/IC Program

- Permittee responsible for implementation
- Local Implementation Plan (LIP) identifies roles and responsibilities
- Implements response, investigation, control, elimination, enforcement, and reporting
- Provides training and public outreach opportunities

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Program Introduction

## ID/IC Program Coverage

- Illegal discharges
- Sewage spills
- Illicit connections
- Identified water quality problems

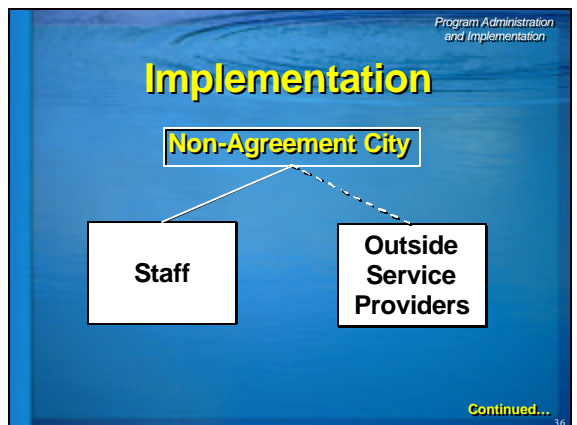
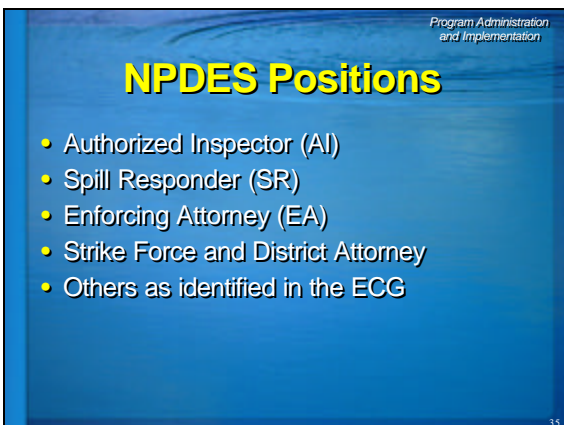
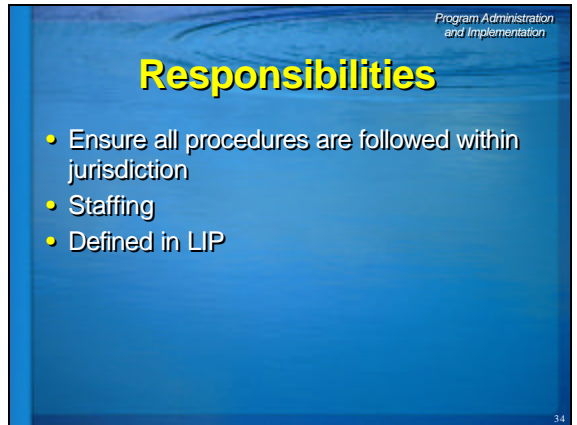
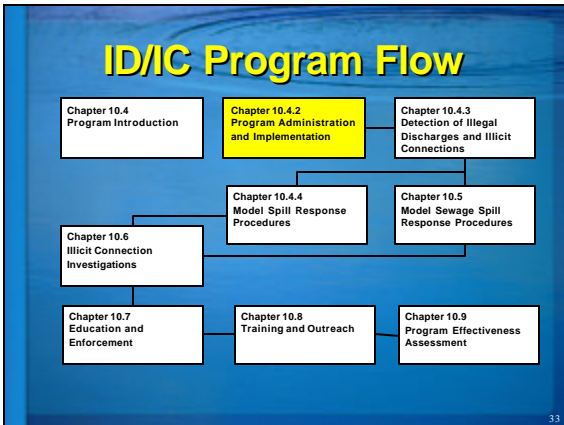
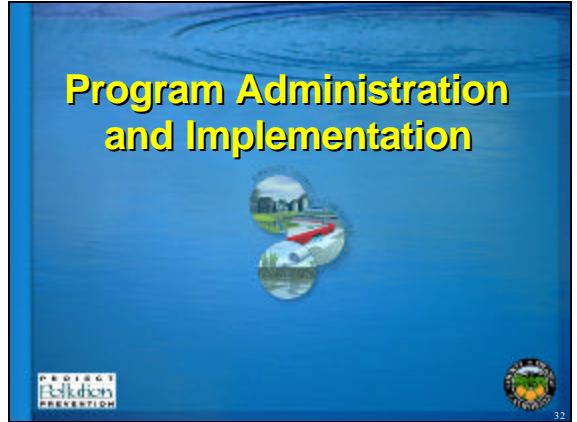
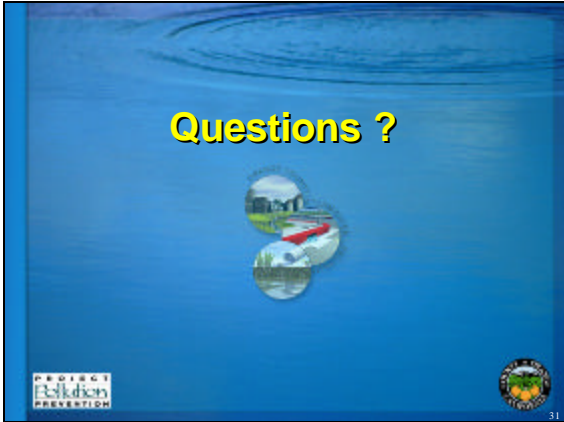
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Program Introduction

## Relationships

- Water Quality Ordinance
  - Permittees adopted to direct enforcement
- Enforcement Consistency Guide, ECG
  - Ordinance companion, enforcement guidance
- Drainage Area Management Plan, DAMP
  - Program for detecting, responding to, investigating, and eliminating ID/IC
- Local Implementation Plan, LIP
  - Describes and outlines guidelines, procedures, and requirements for individual Permittee

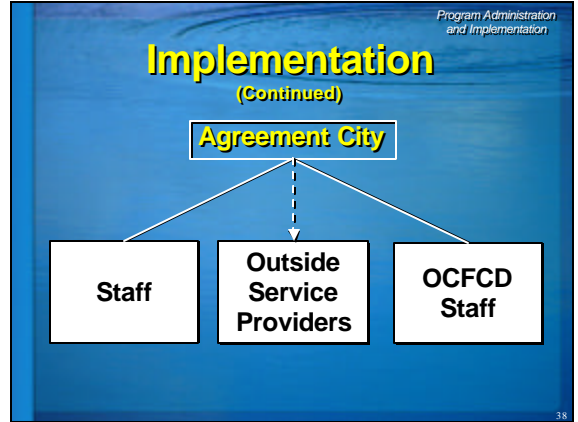
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*Program Administration and Implementation*

## Responsibilities of Permittee **WITHOUT** OCFCD WQO Implementation Agreement

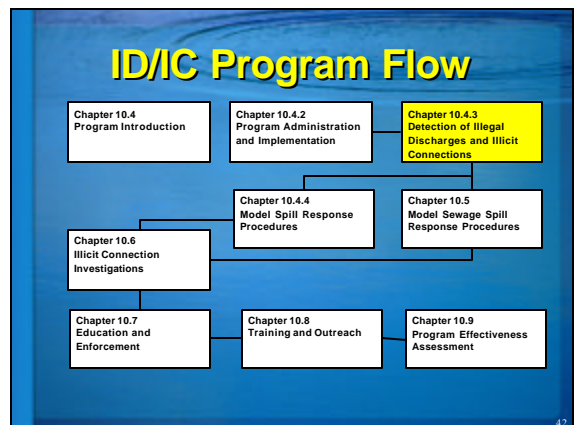
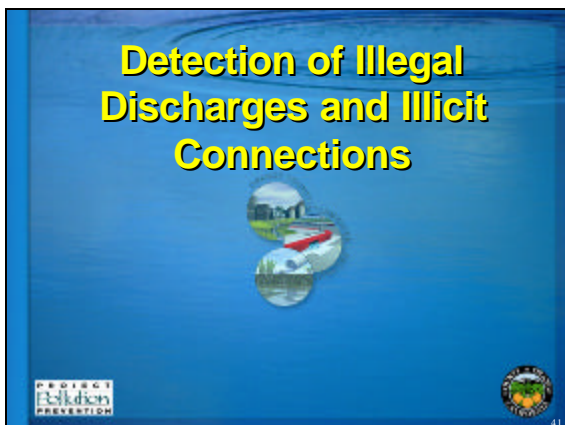
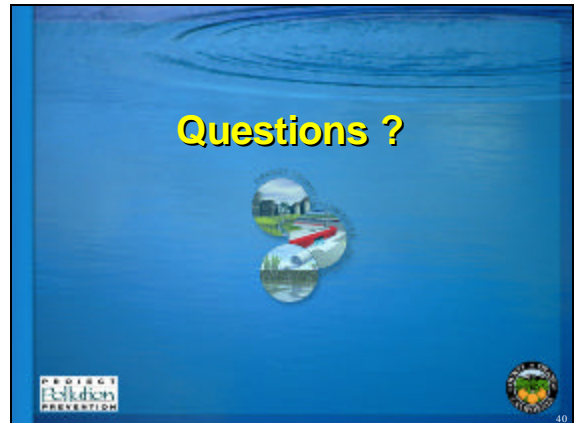
Roles	Responsibilities
Reporting Hotline and Dispatch	Establish, maintain, receive complaints, and make notifications
Designated Authorized Inspector, NPDES Representative or Spill Responder	Assess and investigate incidents.
Authorized Inspector or Code Enforcement	Initiate, track and report spill incidents and enforcement activities
Authorized Inspector, Public Works or Contractor	Initiate, supervise and report clean-up activities. Obtain contractor if necessary.
Authorized Inspector or NPDES Representative	Complete annual reporting requirements



*Program Administration and Implementation*

## Responsibilities of Permittee **WITH** OCFCD WQO Implementation Agreement

Roles	Responsibilities
Reporting Hotline and Dispatch	Establish, maintain, receive complaints, and make notifications— <i>Contact OCFCD to respond when necessary</i>
Designated Authorized Inspector, NPDES Representative or	Assess and investigate non-hazardous incidents- <i>refer hazardous or after hours incidents to OCFCD</i>
Authorized Inspector or Code Enforcement	Initiate, track and report spill incidents and enforcement activities related to non-hazardous incidents— <i>refer hazardous or after hours incidents to OCFCD. Obtain information from OCFCD for annual report.</i>
Authorized Inspector, Public Works or Contractor	Initiate, supervise and report non-hazardous clean-up activities - <i>refer hazardous or after hours incidents to OCFCD. Obtain information from OCFCD for annual report.</i>
Authorized Inspector or NPDES Representative	Complete annual reporting requirements— <i>obtain information from OCFCD for annual report.</i>



Detection of ID/IC

## Responsibilities

- Develop Spill Response Plan
- Spills within your jurisdiction
- Leaves private property
- Proper disposal

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Detection of ID/IC

## Agreement City Information/Documentation

```

    graph TD
      A[Notification/ Complaint] --> B[Dispatch/Pollution Hotline]
      B --> C[NPDES Representative]
      C --> D{Hazard or Technical Response?}
      D -- No --> E[Designated Authorized Inspector response]
      D -- Yes --> F[Service Request to: PFD00CFCD]
      E --> G{Cleanup Required?}
      G -- No --> H{Enforcement Required?}
      G -- Yes --> I[Cleanup by Public Works or Contractor]
      H -- No --> J[No Further Action]
      H -- Yes --> K[Code Enforcement]
    
```

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Detection of ID/IC

## Non-Agreement City Information/Documentation

```

    graph TD
      A[Notification/ Complaint] --> B[Dispatch/Pollution Hotline]
      B --> C[Authorized Inspector/ NPDES Representative]
      C --> D{Hazard or technical response?}
      D -- No --> E[Designated Authorized Inspector]
      D -- Yes --> F[Response by Authorized Inspector/ Spill Response]
      E --> G{Cleanup required?}
      G -- No --> H{Enforcement required?}
      G -- Yes --> I[Cleanup by Public Works or Contractor]
      H -- No --> J[No further action]
      H -- Yes --> K[NOI issued by Code Enforcement]
      F --> L(( ))
      L --> G
    
```

Continued... 45

Detection of ID/IC

## Non-Agreement City Information/Documentation (Continued)

```

    graph TD
      A(( )) --> B{Cleanup required?}
      B -- No --> C{Violation of criminal act?}
      B -- Yes --> D[Cleanup conducted by Hazard contractor]
      D --> E[Notification/ Report to MPOCA]
      E --> F{Evidence complete collected by Authorized Inspector}
      F --> G[Sample analysis by contract lab]
      G --> H[Case submitted for prosecution]
      C -- No --> I[No Further Action]
      C -- Yes --> F
    
```

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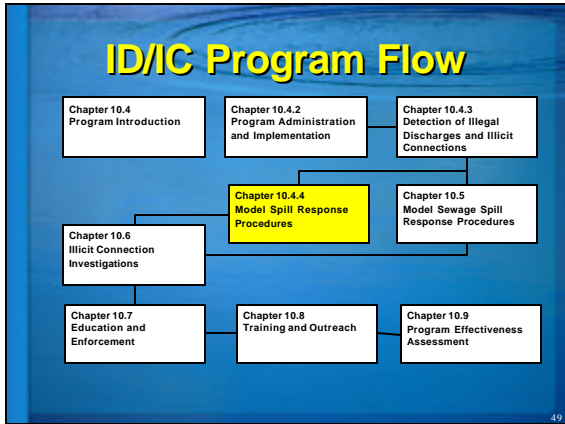
## Questions ?

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## Model Spill Response Procedures

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*Model Spill Response Procedures*

## Types of Field Response

- **Emergency Response**
  - Hazardous materials, significant environmental impact, and/or complex enforcement
- **Non-Emergency Response**
  - Non-hazardous materials, minimal environmental impact, routine enforcement

*Model Spill Response Procedures*

## Administrative Procedures

- Notification, documentation, authorization
- Spill response documentation (PNIR) form
- Spill reporting to outside agencies
- Data collection and spill tracking
- Enforcement and cost recovery

*Model Spill Response Procedures*

## Spill Response Process Summary

```

    graph TD
      S1[Step 1: On-scene Assessment] --> S2[Step 2: Containment and Cleanup]
      S2 --> S3[Step 3: Waste Disposal]
  
```

*Model Spill Response Procedures*

## Spill Response

### Step 1: On-scene Assessment

- **Evaluate:**
  - Jurisdiction and responsibility
  - Potential impacts
- **Potential notifications**
  - Other jurisdictions
  - Agencies

*Model Spill Response Procedures*

## Spill Response

### Step 2: Containment and Cleanup

- No Further Action
- Stop/Control Discharge
- Containment
- Cleanup
- Follow-up

Model Spill Response Procedures

## Spill Response

**Step 3: Waste Disposal**

- Diversion
- Proper containers
- Storage
- Manifest
- Hazardous waste



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Model Spill Response Procedures

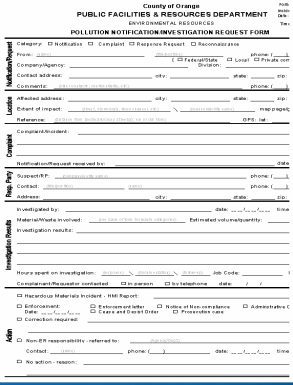
## Administrative Measures

- Managing Clean-up
- Spill Monitoring and Tracking
- Documentation
- Reporting

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Model Spill Response Procedures




## PNIR Form



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Model Spill Response Procedures




## Questions ?

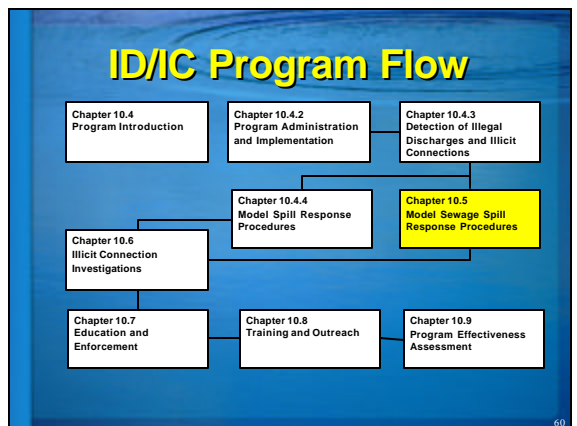
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Model Spill Response Procedures

## Model Sewage Spill Response Procedures

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Model Sewage Spill Response Procedures

## Sewage Spill

- From a sanitary sewer system or private property
- All sewage spills constitute an illegal discharge.




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Model Sewage Spill Response Procedures

## Sanitary Sewer Overflow

- Any overt spill, release, discharge, or diversion
- All SSOs that reach a storm drain constitute an illegal discharge.




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Model Sewage Spill Response Procedures

## Sanitary Sewer System

- Any system used to collect and convey municipal sewage
- Includes all temporary storage and conveyance facilities



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Model Sewage Spill Response Procedures

## Sewage Spill Response

- Same procedures outlined in Section 10.5.3 of the 2003 DAMP
- Local sanitation agencies also respond
- Cooperate in training, response, and reporting

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Model Sewage Spill Response Procedures

## Administrative Measures

- Includes all responsibilities for general spills
- Collect information on PNIR form
- Coordination of required reporting with sanitation districts
- Annual Reports

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Model Sewage Spill Response Procedures

## Reporting

- Permittee reports to the Regional Board
- Sewage Agency must report spill to:
  - Regional Board
  - Orange County Health Care Agency (HCA)
  - State Office of Emergency Services (OES)
- San Diego Permittees currently under Stay

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*Model Sewage Spill Response Procedures*

## Report Coordination

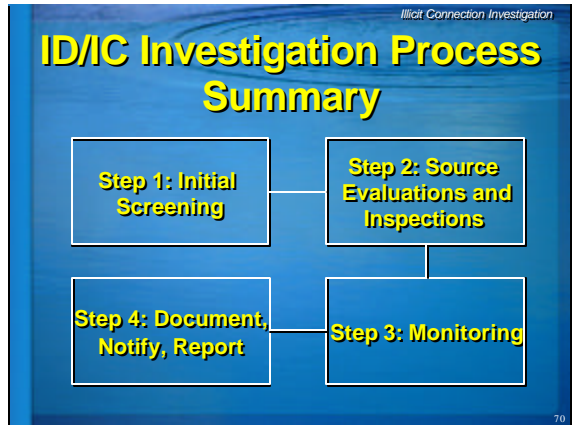
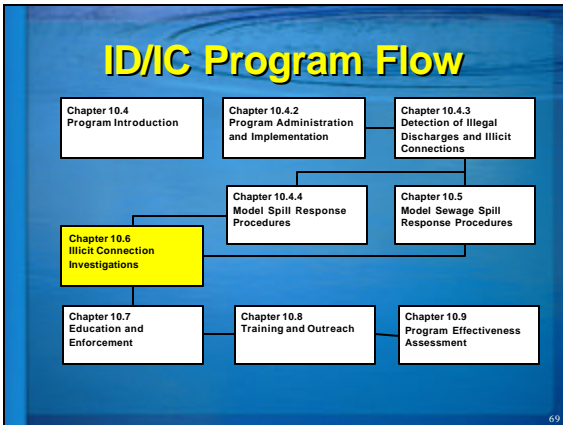
- Coordinate with sewage agency to eliminate redundant reporting
  - Set up notification procedures
  - HCA can be resource
  - Control One notified by some agencies
- Permittee will normally report spills from private laterals and septic systems

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## Illicit Connection Investigations



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*Illicit Connection Investigation*

## Step 1: Initial Screening

- Gather information on sources
- Review previous investigations
- Contact other local authorities
- Review drainage area maps
- Records and permits
- Analyze water quality data

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*Illicit Connection Investigation*

## Step 2: Source Evaluations and Inspections


- Proper equipment
- Safety
- Tracking methods
  - Above ground
  - Below ground
- Data collection and field notes

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*Illicit Connection Investigation*

## Step 3: Monitoring

- Water tests
- Dye and smoke tests
- Video inspection



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*Illicit Connection Investigation*

## Step 3: Monitoring

- Qualitative field observations
- Flow measurement
- Water quality parameters
- Certified laboratory
- 40 CFR 136 methods
- QA/QC

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*Illicit Connection Investigation*

## Step 4: Document, Notify, Report

- Comprehensive (never too much)
- Photographs
- Interviews
- Written logs and reports
- Leads to identifying responsible party (RP)


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## Questions ?

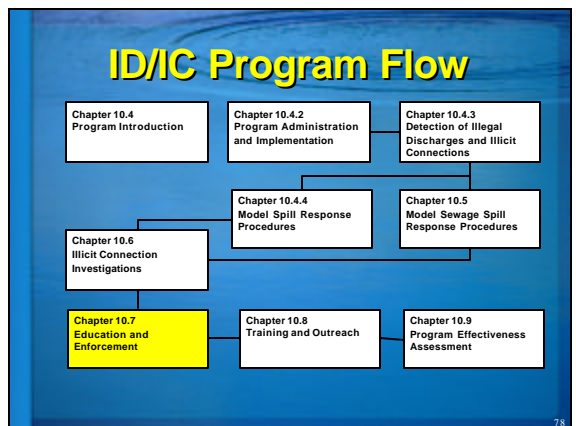


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## Education and Enforcement



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Education and Enforcement

## Reference


- Water Quality Ordinance
- Based on ECG
- LIP contains enforcement response guide
- Permittees select appropriate enforcement action

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Education and Enforcement

## Enforcement Options

- Educational Letter
- Administrative Remedies
- Criminal Remedies
- Other civil or criminal remedies as appropriate



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Education and Enforcement

## Educational Letter

- Complaint received, no direct evidence observed
- Suspected areas, businesses, activities
- Additional information with letter
  - Educational brochures
  - Pamphlets
  - Posters

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Education and Enforcement

## Administrative Remedies

- Educational Letter
  - Potential problem
  - Lack of evidence
- Notice of Non-compliance
  - Minor infractions
  - Directs violations to be corrected
- Administrative Compliance Order
  - Non-compliance cannot be corrected in a short period
- Cease and Desist Order
  - Immediate action necessary to stop existing discharge

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Education and Enforcement

## Criminal Remedies

- Issuance of Citation
  - Responsible party should sign
- Infractions
  - Misdemeanor acts
  - First infraction not more than \$100, second \$200, and \$500 for each additional during the year

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Education and Enforcement

## Other Civil or Criminal Remedies As Appropriate

- Administrative Hearings
  - AI may revoke or modify existing permits
  - Appeals to a designated Hearing Officer
- Injunction or Other Civil Enforcement
  - Enforcing Attorney usually approves and initiates

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*Education and Enforcement*

## Enforcement Consistency Guide

- Allows Permittees to select from several alternative initial and follow-up actions
- Provides consistent enforcement throughout the County
- LIP Enforcement Response Guide
  - Matrix describing violations and enforcement options
  - Permittees establish


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## Questions ?

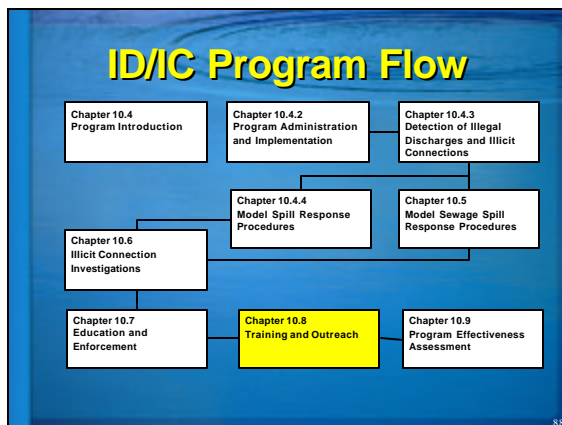


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## Training and Outreach



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*Training and Outreach*

## Training


- Training modules
- Outside training
- Potential candidates
- Implementation
- Record-keeping

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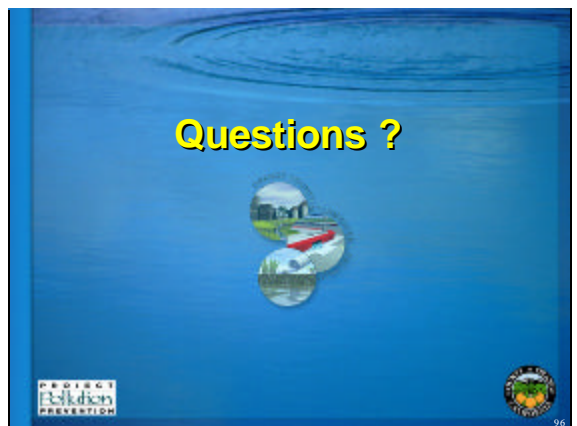
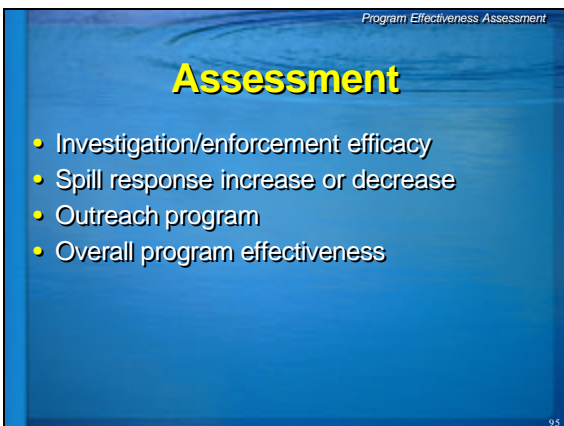
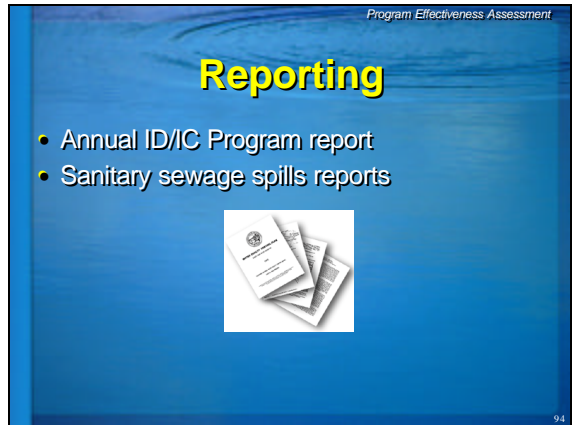
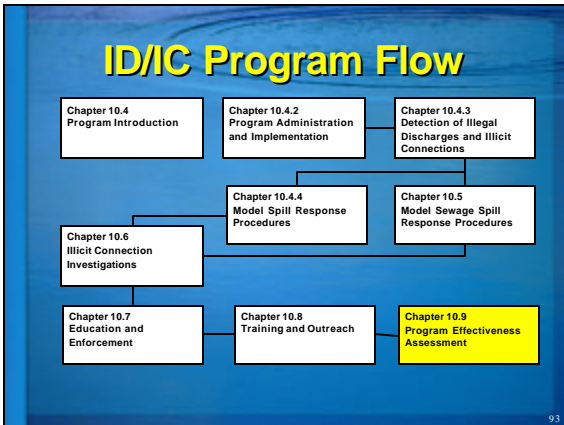
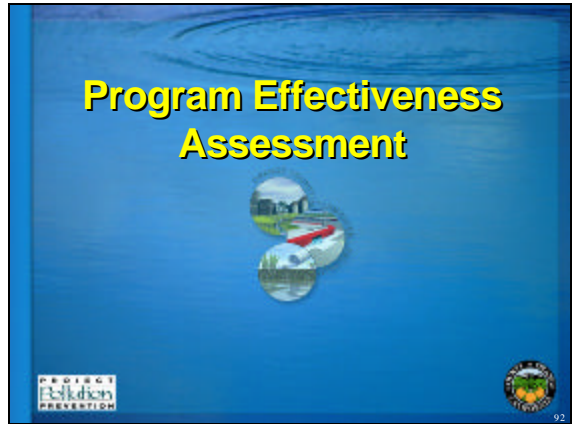
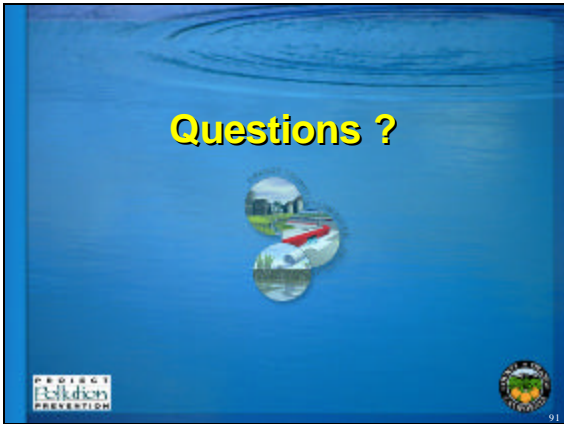
*Training and Outreach*

## Outreach

- Web Page
- Mailings
- Brochures and posters




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Conclusion



PROJECT  
Pollution  
PREVENTION



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Conclusion

## Conclusion


- Water pollution degrades surface waters
- ID/IC are sources of contamination
- Investigation identifies sources
- Enforcement reduces ID/IC

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Conclusion

## Remember

- Everyone benefits from clean water, and everyone has a responsibility to protect it by reducing urban runoff and stormwater pollution.



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Conclusion

## Resources

For more information:  
Visit [www.ocwatersheds.com](http://www.ocwatersheds.com)  
or  
Call the Orange County Stormwater Program at 714-567-6363.

PROJECT  
Pollution  
PREVENTION



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Conclusion

## Thank You!

Thank you for attending and learning how you can help!

PROJECT  
Pollution  
PREVENTION



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## Handouts

- Meeting Agenda
- Glossary
- Hard copy of presentation
- Contact list

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