

Illicit Discharge Detection and Elimination Program Manual

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City of Camas
Stormwater Division | Public Works



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Introduction

Background

The City of Camas (City) has made a strong commitment to protect and manage the City's natural resources. The Stormwater Division of the Public Works Department seeks to minimize the negative effects of development and pollution, while maximizing environmental protection and conservation. Protecting and preserving the quality of the City's surface water is a key focus area of the Stormwater Management Program (SWMP).

In the State of Washington, Environmental Protection Agency (EPA) has delegated the National Pollution Discharge Elimination System (NPDES) program administration to the Department of Ecology (Ecology). Ecology issued a Phase II Municipal Stormwater Permit (Permit) to the City of Camas in January 2007. The Permit requires the City to have a SWMP with eight major conditions. One of those conditions requires that "The SWMP shall include an ongoing program to detect and remove illicit connections, discharges as defined in 40 CFR 122.26(b)(1), and improper disposal, including any spills..., into the municipal separate storm sewers owned or operated by the Permittee" (Permit Condition S5.C.5). In August 2011, the City began implementing an ongoing illicit discharge detection and elimination (IDDE) program. The program goals are to prevent, locate, and correct illicit discharges.

The City's IDDE program is managed by the Public Works Department. Maintenance staff and construction site inspectors play an important role in identifying illicit discharge problems and responding to clean-up requests. Other departments such as Community Development, Fire and Police staff also play an important role in locating, identifying, and reporting potential illicit discharges.

Citizen Reporting and Interdepartmental/Interagency Referral

Illicit discharges and connections are identified through citizen reporting, interdepartmental or interagency referral, or annual field screening activities. The City relies on local citizens, City field staff, and construction inspections to detect potential problem areas, so it can be addressed before it causes significant water quality degradation.

Public outreach encourages residents to participate in the reporting process and help the City to receive timely reports of obvious problems like illegal dumping, spills, or strong odors. The City's field screening activities provide opportunities to document and identify potential problems that may not be obvious to the public.

A central reporting phone line has been established to handle water quality incident reports citywide. Citizens that suspect an illicit discharge, an illicit connection, or an illegal dumping action can call the City's Illicit Discharge Hotline at 360-817-1565 to report the incident. The City also has a mobile application, CamasConnect 24/7, for citizens to report the incident. The information will be routed to the appropriate staff for response. Calls may be made directly to the Ecology Southwest Regional Office at 360-407-6300.

After hours, emergency problems should be reported through 911, where operators will assess the severity of the incident and determine if emergency response (fire, hazmat, etc) is needed. Callers will then be put in contact with the City's on-call utility contact to address the problem. Residents that encounter a non-emergency incident are encouraged to report the problem the next business day through the City's Illicit Discharge Hotline. If after hours messages are left on the City's Public Works voicemail, staff will follow-up with the caller during the next business day.

IDDE Program Summary

The Permit requires the permittees to develop an IDDE program encompassing the elements listed below. Each element is addressed in this IDDE Program Manual.

- Develop a municipal separate storm sewer system map.
- Adopt an ordinance to prohibit non-stormwater, illegal discharges, and/or dumping into the storm sewer system.
- Procedures for characterizing the nature of an environmental threat, tracing the source, and eliminating the discharge.
- Maintain records of all IDDE program activities.
- Provide IDDE training for municipal staff.
- Educate employees, businesses, and the public about illicit discharge concerns.

This manual is intended to assist City staff in implementing the IDDE program. It is to be used as a guidance document in their day-to-day activities related to IDDE. This document can also be used as a training tool to ensure that all staff is following the same procedures in responding to illicit discharge concerns.



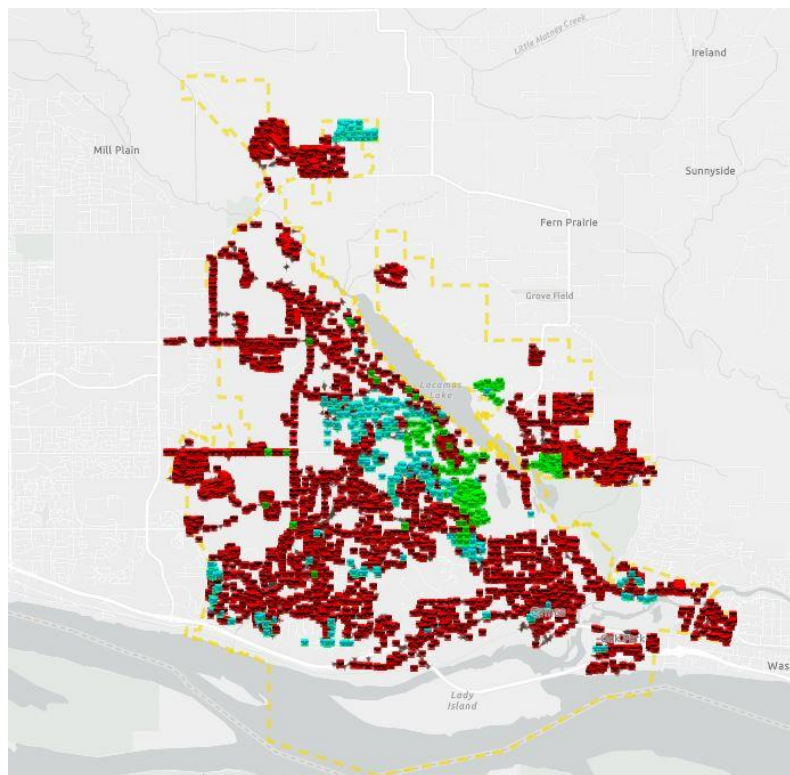
Storm Sewer System Map

The mapping of the City's Municipal Separate Storm Sewer System (MS4) is an ongoing dynamic process that plays a large part in the IDDE program. Maintaining an accurate map of the stormwater drainage system allows the City to track and locate the source of suspected illicit discharges. The Permit outlines minimum information that should be included in the City's MS4 mapping:

- Location of all known municipal storm sewer outfalls (size and material), receiving waters, and structural BMPs owned, operated, or maintained by the City.
- Tributary conveyances (type, material, size) leading to outfalls that are 24-inches or larger (or have an equivalent cross-sectional area).
- Drainage areas and land use for the drainage basins contributing to outfalls that are 24-inches or larger (or have an equivalent cross-sectional area).
- Drainage areas within the City that do not discharge to surface water (aka closed depressions).

The Department of Ecology requires the map be prepared in GIS format and the map must be made available to Ecology upon request.

The City's mapping efforts are primarily focused on mapping the locations of outfalls and the drainage system infrastructure (pipes, ditches, catch basins, manholes, and stormwater facilities). The City continues to develop a comprehensive map of the City's stormwater infrastructure with the use of ArcGIS. The City utilizes ESRI applications to collect information in the field.



IDDE Ordinance

What is an Illicit Discharge?

An illicit discharge is “Any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from firefighting activities”, except as permitted or exempted in CMC 14.04.070. Examples of illicit discharges include:

- A measurable flow during dry weather that contains pollutants or pathogens
- Disposal of vehicle maintenance fluids into a storm drain
- Hosing or washing loading areas in the vicinity of storm drain inlets
- Leaking dumpsters flowing into a storm drain inlet, and
- Old and damaged sanitary sewer line leaking fluids into a cracked or damaged storm sewer line.



What is an Illicit Connection?

An illicit connection is “Any manmade conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections.” Examples include sanitary sewer connections, floor drains, channels, pipelines, conduits, inlets, or outlets that connect directly to the municipal separate storm sewer system (CMC 14.04.050).

Camas Municipal Code IDDE Ordinance

On August 17, 2009, the City adopted Ordinance 2556, which added a new chapter (CMC 14.04) to the Camas Municipal Code to address IDDE. The City updated the ordinance in July 2022 with a name change from ‘Illicit Discharges, Dumping and Illicit Connection’ to ‘Water Resources Protection’. The code updates include requiring application of source control best management practices for pollutant generating sources associated with existing land uses and activities.

Illicit Discharge Detection Procedures

Purpose

Potential illicit discharge problems can be revealed through field screening, reports from staff, tenants, or the public. When a complaint is reported, the Permit requires that a follow-up investigation be initiated within 7 days, on average. The follow-up investigation could include a site visit to look at the problem area, review of mapping information, review of past complaints or investigations at the location, or other data collection and review. Once a problem has been verified (either through a routine field screening inspection or follow-up to a called-in complaint) the City will begin an official illicit discharge investigation, following the procedures outlined in Figure 1.

The City shall initiate an investigation within 21 days of any report or discovery of a suspected illicit connection to determine the source of the connection, the nature and volume of discharge through the connection, and the party responsible for the connection.

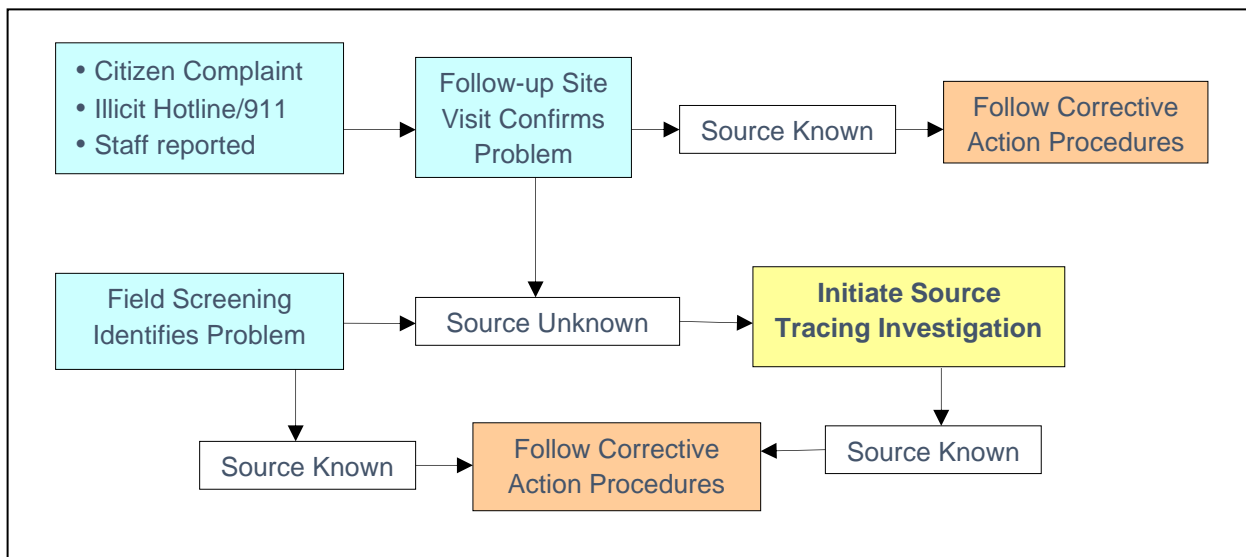


Figure 1. Routes to an Illicit Discharge Investigation

When an illegal dumping or illicit discharge problem is directly observed by a member of the City staff, it is generally not necessary to follow these investigation procedures. In those scenarios, the source of the problem is known. Problems revealed through direct observation are referred directly to follow the corrective action procedures.

Field Screening and Source Tracing

The Permit requires the City to perform annual field screening activities for an average of 12% of the MS4 each year. The City's chosen field screening method is public outfall inspections. The City references the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual (Herrera Environmental

Consultants, Inc., May 2020) for procedures in conducting field screenings and source tracing. Source tracing begins when a suspected problem area is identified through field screenings, field inspections, or a complaint call. When the source of the non-stormwater discharge is not known, source tracing is required.

Field screening and source tracing may be performed by City staff or consultants hired by the City. All field reports will be reviewed by the Public Works Director (PWD) or appointed staff.

When potential problem areas are identified, field crews should report the observations to the PWD. Based on the severity of the problem, the PWD will direct staff to open a case log and begin the investigation procedures. The PWD will also determine if other City departments or outside agencies need to be involved.



Source Investigation Priority Levels

Table 1 outlines the priority levels to assist City staff in determining the appropriate response time for initiating a source investigation after a problem is identified in the field. Priority levels are based on the suspected pollutant source(s) of a reported problem. According to the Permit, illicit discharge investigations should begin within 7 days of identifying a problem. In most cases, the City strives to respond faster than the required timeline.

Table 1. Source Investigation Priority Levels

Priority Level	Suspected Pollutants	Response Time (Business Days)	
1	Alkalis Automotive products Bases Cleaning products Degreaser or solvent Drain cleaner Fertilizer Flammable/explosive materials	Herbicide Metals Painting products Pesticide Petroleum Process Wastewater Sewage Unknown chemicals	1-2
2	Ammonia Construction runoff (silt, sediment, gravel)	Detergents Food waste (fats, oils, grease) Soap	3-5
3	Car washing Pressure washing waste Spa or pool water	Steam cleaning waste Yard waste	5-7
4	Animal carcasses Bacteria Construction materials Debris	Foam Rust Trash Other	Within 10 days

Priority levels were determined based on the potential public health and/or water quality threat posed by a given pollutant. The response time indicates a target time frame for opening a case log and initiating a source investigation. Contact Emergency Services (911) and City (360-817-1565) immediately if discharge poses severe threat to human health or the environment.

Follow-Up Actions

Once the source of an illicit discharge has been identified, the field crews and/or appointed staff should initiate private property site entry procedures (if needed), notify the property owner or operator of the problem, and provide the appropriate educational materials and/or a copy of CMC 14.04. This is an important first step in the corrective action process. Field crews should also notify the PWD and Stormwater Permit Coordinator, complete the Illicit Discharge Reporting Form, and enter all information in the case log to document the findings. The PWD and Code Enforcement Officer can then begin working through the corrective action steps.

Corrective Action

Purpose

The City will respond to identified illicit discharges, illicit connections, or illegal dumping activities using progressive enforcement actions. Corrective actions will focus first on education to promote voluntary compliance and escalate to increasingly severe enforcement actions if voluntary compliance is not obtained. The PWD and Code Enforcement Officer should use judgment in exercising the right mix of compliance assistance and enforcement to correct identified problems. The City Attorney may levy fines if the violation is found to be willful, intentional, or egregious.

Compliance

Voluntary Compliance

The preferred method of achieving compliance when addressing an illicit discharge problem is to pursue 'voluntary' compliance through education of the property owner or responsible party. Often, business operators and property owners are not aware of the existence of illicit connections or activities on their properties that may constitute an illegal discharge. In these cases, providing the responsible party with information about the connection or operation, the environmental consequences, and suggestions on how to remedy the problem may be enough to secure voluntary compliance.

Education begins during the site investigation when the operation or connection is first confirmed. Property owners and operators should be notified that the problems must be corrected in a timely manner and that the City will be conducting a follow-up site visit to verify compliance. Field staff should also provide the property operator with an educational brochure describing illicit discharge violations and a copy of CMC 14.04. Field staff should also remind property owners of their obligation to report discharges to the proper agencies. The severity of the violation will govern the timeframe granted, by the PWD, to institute the remedy.

Compliance by Permit Holders

Permit holders of the Construction Stormwater General Permit (regulates stormwater discharges from construction sites one acre or larger) or the Industrial General Stormwater Permit (authorizes stormwater discharges associated with industrial activities) are expected to be knowledgeable of the measures required to be in compliance with their permit. A standard operating procedure (SOP) is in-place, for use by staff, outlining the steps for enforcement (Figure 2). Failure to eliminate an illicit discharge by these permit holders shall result in a shorter timeframe to remedy the violation before fines are levied.

Operational Problems

Property owners are responsible for correcting operational problems that are leading to illegal discharges to the storm drainage system. This could include moving washing activities indoor or undercover, covering material storage areas, locating an appropriate discharge location for liquid wastes, or other operational

modifications. Through site visits and education, the City can provide technical assistance to aid property owners in identifying the required modifications.

Structural Problems

Most illicit connection problems will require a structural modification to correct the problem. Structural repairs can be used to redirect discharges such as sewage, industrial, and commercial cross-connections. Such cross-connections must be re-routed to an approved sanitary sewer system. Correcting structural problems is the responsibility of the property owner, though the City may provide technical assistance throughout the process.

Enforcement Actions

When voluntary compliance does not produce the required result, the City will pursue follow-up enforcement action. All enforcement actions will be the responsibility of the PWD (or assigned staff) and the Code Enforcement Officer. Table 2 and Figure 2 outline the detailed enforcement steps. Serious violations or continued non-compliance may warrant a more aggressive, enforcement-oriented approach.

Enforcement Step	Details	Responsibility
Step 1 – Initial Actions	<ul style="list-style-type: none"> • Provide educational materials (i.e. brochure and copy of CMC 14.04) • Encourage voluntary compliance • Provide summary letter* setting expected compliance date • Additional staff support or technical assistance • Request evidence of corrected problem (if applicable) • Site visit to verify compliance 	PWD or assigned staff
Step 2 – Follow-up Actions	<ul style="list-style-type: none"> • Send “notice of violation” letter* to property owner regarding unresolved issues • Set second compliance date (determined on individual incident basis) • Site visit to verify compliance 	PWD, Code Enforcement Officer, City Attorney
Step 3 – Final Actions	<ul style="list-style-type: none"> • Send second “notice of violation” letter* indicating that unresolved issues will be referred to prosecutor • City may correct problems and send bill to property owner • Levy fines following CMC 14.04.330 	PWD, Code Enforcement Officer, City Attorney

* Retain copies of all letters within the case log database

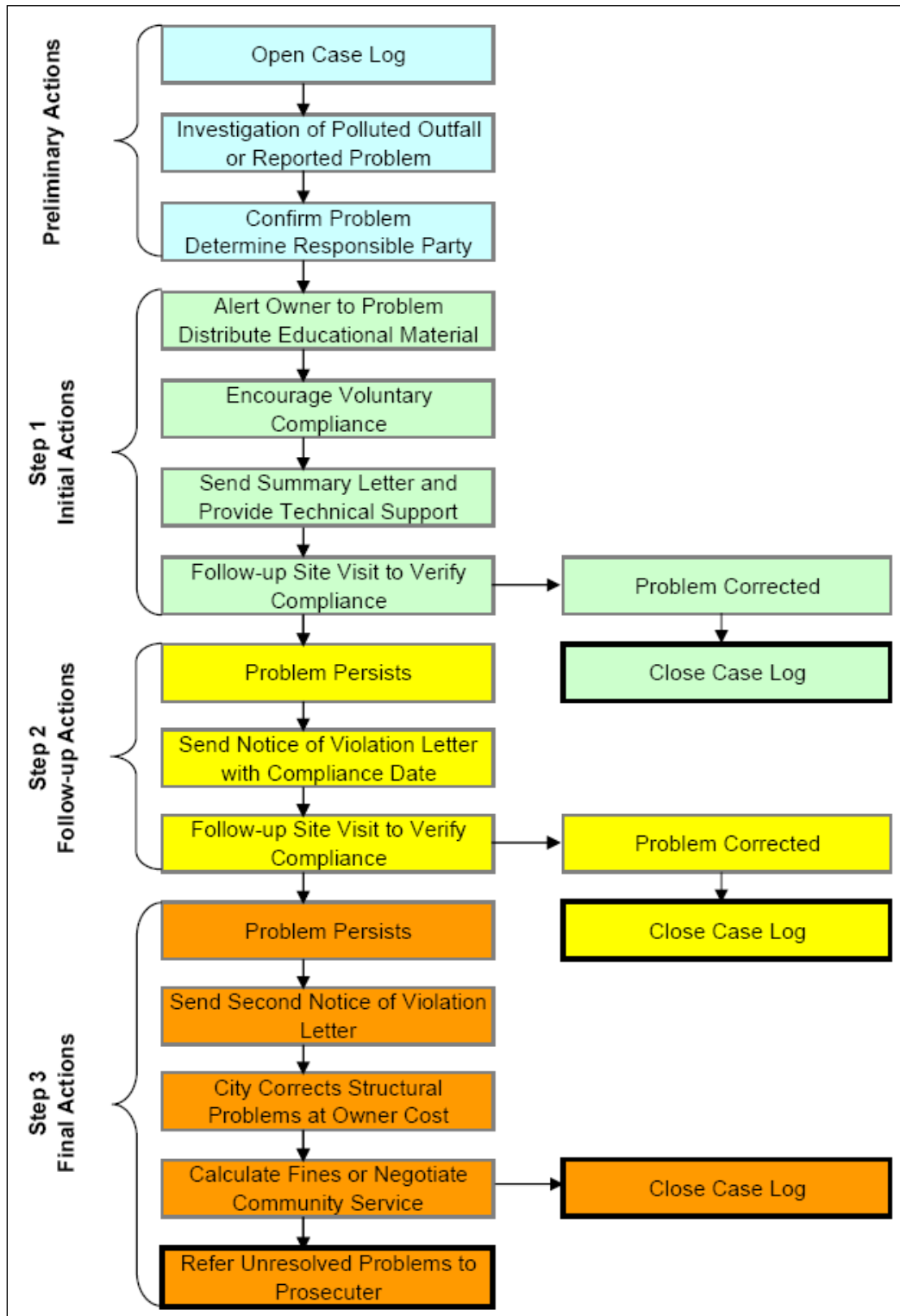


Figure 2. City of Camas IDDE Enforcement Steps

Enforcement Timeline

The timeline of corrective action procedures is highly dependent on the nature of the violation and the responsiveness and cooperation from the person(s) responsible. The urgency of addressing identified problems is based on the nature of the pollutant in question and potential impact to downstream waters. Compliance dates should be included in all violation notices.

The Permit requires identified problems to be corrected and illicit connections removed within 180 days of identifying the source. If property owners are not addressing problems in a timely manner, the City may step in and perform the repairs necessary to remove an illicit connection, eliminate an illicit discharge, and/or clean-up a dumping incident. Property owners will be responsible for reimbursing the City for any costs occurred in correcting IDDE problems.

Potential Fines

Illicit discharge violations are subject to fines and penalties under CMC 14.04.330. Civil penalties can be in the amount not to exceed \$5000 per day with each day being a separate violation. Where a remediation or mitigation order has been issued, failure to comply constitutes a gross misdemeanor punishable by up to one year in jail or \$5000 fine or both.

Record Keeping

The Permit requires the City to keep records of all stormwater program activities. Thorough record keeping is particularly important for a successful IDDE program. Records of past problems can help focus an investigation in the right direction or identify repeat offenders. Record keeping is also critical to the enforcement process. The different types of information to be retained are included below:

- **Citizen Complaints** – Retain Customer Relationship Management (CRM), email and/or phone call information.
- **Inspections** – Maintain inspection forms, catalog, and organize photographs, enter open case logs for suspected problem areas.
- **Investigations** – Retain inspection forms, photographs, education opportunities, technical assistance, and lab testing results.
- **Financial Records** – Track investigation costs including equipment, materials and labor until the case is closed.
- **Corrective Action** – Retain copies of compliance/enforcement letters, correspondence with property owners, and proof of corrected problems (contract and invoice for completed work or clean field investigation report).

The inspections forms: IDDE Reporting Form, Sanitary Sewer Overflow (SSO) Form and Field Screening Form; are in Appendix A. The SOP for when field staff encounter a spill, discharge, sewage overflow or illicit connection is also in Appendix A. The SOP and copies of the IDDE and SSO forms are placed in all field staff vehicles.

The Permit requires the City to address 12 questions on key details on each IDDE incident:

- Jurisdiction Name and Permit Number
- Date incident discovered or reported
- Date of beginning of response
- Date of end of response
- How as the incident discovered or reported?
- Discharge to MS4?
- Incident location
- Pollutants identified
- Source or cause
- Source tracing approaches used
- Corrective/elimination methods used
- Field notes, explanations, and/or other comments

Case Log

When problems are identified, a case log is opened assigning a case number or ERTS number, creation date, case description and the primary staff contact/investigator. The investigator assigned to the case shall keep an accurate log of labor, materials and costs associated with the investigation for invoicing the responsible party. The case log should be opened prior to completing any additional field work unless the nature of the discharge necessitates immediate response. The file should include copies of the following, if applicable:

- Inspection Report;
- Photographs;
- Additional field notes;
- Lab testing results;
- Compliance letters sent and responses received;
- Correspondence (mail, email, telephone logs);
- Proof of corrected problems (contract and invoice or clean field investigation report).

Any field investigations, photographs, corrective actions, or other activities associated with the suspected problem area should be documented in the case log. This becomes the City's official record of the IDDE investigation.

Record Storage

A central location for filing of case logs is an important component to the record keeping process. Paper copies are scanned in, and PDF copies of documentation are stored in the case log folders. The case log folders are kept in a file designated for illicit discharges and located on the computer serve under Public Works Department.

The Permit requires that all IDDE program records be retained for a minimum of 5 years. However, longer term record storage will be helpful in building a library of data that describes pollutant problems in the City. To facilitate this process the City will maintain the files as long as data storage availability allows past the required 5 years.

Staff Training

The City has developed a comprehensive training to meet the requirements of the Permit:

- Training for all staff members, that are routinely in the field, to educate them on what constitutes an illicit discharge problem and how to report suspected problems.
- Training for illicit discharge responders on proper identification, investigation, clean-up, disposal, and reporting techniques for illicit discharges.
- Training for Public Works administration staff on how to handle receipt of an illicit discharge report. The training will help staff to collect the appropriate information for the type of discharge being reported and provide guidance for routing the report to the appropriate staff for response.


Training for illicit discharge responders will primarily include distribution and review of this procedures manual as well as a refresher on City spill response procedures. Follow-up trainings for illicit discharge responders may take the form of debriefings following significant IDDE incidents. Debriefings allow staff to review the actions that were taken and identify what worked well and what should be modified for future responses.

The training is conducted by Public Works staff using materials developed for other aspects of the IDDE program. The City has developed a presentation and follow-up quiz that is used for conducting the overview training for all field staff. All staff training is tracked and recorded.

Watch short clip below and check all illicit discharges * 1 point

- Pet Waste
- Motor Oil
- Fertilizer
- Sewage

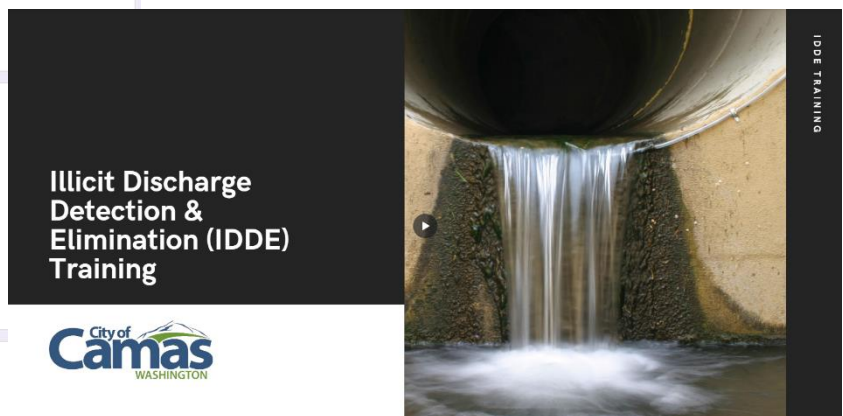
Illicit Discharge Clip



Who owns the MS4? *

- Mayor
- City of Camas
- State of Washington
- Ecology

True or False: In an event of a harmful discharge or spill, it must be reported to Ecology within 24 hours of discovery. * 1 point



Public Education

The Permit requires the City to conduct outreach activities to educate the public and business community about water quality protection. Outreach activities focus on reducing pollutants at the source by educating the public and businesses about their ultimate impact on the natural environment. Many members of the community are open to modifying behaviors once they understand the potential negative consequences.

The City has conducted outreach activities aimed at educating residents about natural yard care techniques, habitat protection, and personal impact on the natural environment. These programs have been well received by the public, and the City is hoping to expand the education efforts and direct more focus to the local business community.



References

Herrera Environmental Consultants, Inc. *Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual*. May 2020.

Appendix A



Public Works Department, 1620 SE 8th Ave Camas, WA 98607, 360-817-1563

ILLICIT DISCHARGE FIELD SCREENING FORM

Name:	Contract Phone Number:
Date:	Time:
Sample Location:	

Illicit Discharge Indicators

1. pH: _____ (threshold pH < 5 or pH > 9)
2. Turbidity: <input type="checkbox"/> Visible <input type="checkbox"/> Cloudy <input type="checkbox"/> Opaque <input type="checkbox"/> None
3. Ammonia: _____ mg/L (threshold ammonia > 1mg/L)
4. Temperature: _____ (threshold: above ambient air temperature)
5. Color: <input type="checkbox"/> Yes, (describe color) _____ <input type="checkbox"/> No
6. Odor: <input type="checkbox"/> Yes <input type="checkbox"/> No
7. Visual Indicator:
8. Do results from items 1 to 7 indicate an exceedance of threshold? <input type="checkbox"/> Yes, this is an illicit discharge, fill out illicit discharge form <input type="checkbox"/> No, this is not an illicit discharge, no other action required
9. Is the source of discharge known? <input type="checkbox"/> No, collect water sample and send to lab for analysis <input type="checkbox"/> Yes, no action required

Notified Supervisor

Note: Upon completion, submit form and all pertinent documentation to Supervisor.

Inspector Signature

INSTRUCTIONS TO COMPLETE ILLICIT DISCHARGE REPORTING FORM

- A. Initial City staff onsite who witnessed the discharge.
- B. City staff performing the inspection and mitigation of the discharge.
 1. Description of discharge location.
 2. Provide an estimate of when the last rainfall event occurred.
 3. Date and time of when the discharge started and ended.
 4. Describe the nature of the discharge or flow frequency.
 5. Estimate the total amount of discharge that have occurred.
 6. How did the discharge enter the municipal storm sewer system (MS4)? A MS4 is a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains).
 7. Provide any photos if available.
 8. Describe the source of the discharge if known.
 - 9 to 11. Source identification: Determine the source of the discharge. Perform follow up site visit and/or further investigate to eliminate the source.
 12. What method was used to clean up the discharge and how was it removed?
 13. Is there anything that can be done to prevent future reoccurrence?
 14. Notify Ecology of all spills or discharges within 24-hours.
 15. Notify Department of Health - Shellfish
 16. Notify Washington Emergency Management Division if the discharge was oil or hazardous substances.

WHAT IS AN ILLICIT DISCHARGE:

An illicit discharge is any discharge into the storm sewer system (MS4) that is not composed entirely of storm water. Examples:

- Dry weather discharges of wastewater into the storm sewer system from illegal dumping; spills and other non-storm water pollution sources
- Discharges of pollutants, contaminants or illicit materials into storm drainage/sewer systems (oils, grease, solvents, metals, nutrients, toxics, viruses, bacteria)
- Improper antifreeze, oil disposal from vehicle maintenance, service stations
- Vehicle washing wastewaters
- Auto body/repaid 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 bard waste waters
- On-lot disposal system-sewage effluent

WHAT IS NOT AN ILLICIT DISCHARGE:

The following non-stormwater discharge are not illicit discharges:

- Discharges from firefighting activities
- Potable water sources including dechlorinated waterline and fire hydrant flushing
- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration
- Uncontaminated pumped ground water
- Foundation drains
- Air conditioning condensation
- Irrigation drainage
- Springs
- Uncontaminated water from crawl space pumps
- Footing drains
- Flow from riparian habitats and wetlands
- Lawn watering and other irrigation runoff
- Soap and sediment-free discharges from street and building exterior washing activities
- Non-stormwater discharges authorized by another NPDES or state waste discharge permit



Public Works Department, 1620 SE 8th Ave Camas, WA 98607, 360-817-1563

ILLICIT DISCHARGE DETECTION & ELIMINATION (IDDE) REPORTING FORM

Is this a sanitary sewer overflow?	Yes – fill out Sanitary Sewer Overflow (SSO) Reporting Form instead
	No – continue to next question
Did the discharge enter the municipal storm sewer system (MS4)?	Yes – continue with form
	Unsure – continue with form

A. Person Reporting Discharge

Name:	Contact Phone Number:
Date Discharge Discovered:	Time Discharge Discovered:

B. Inspector Information

Name:	Contact Phone Number:
Date:	Time:

C. Discharge Information

1. Location (address/nearest intersection/landmark):	
2. How long since last rainfall: <input type="checkbox"/> Raining Now <input type="checkbox"/> 0-2 Days <input type="checkbox"/> 3 or more days	4. Nature of discharge or flow: <input type="checkbox"/> Solid (Continuous) <input type="checkbox"/> Intermittent (Occasional) <input type="checkbox"/> Pulsing (Fluctuating) <input type="checkbox"/> Transitory (Prior Spill)
3. Date flow started: _____ Time flow started: _____ Date flow ended: _____ Time flow ended: _____	6. Entered MS4 by: <input type="checkbox"/> Roadside Ditch <input type="checkbox"/> Catch Basin <input type="checkbox"/> Storm Pond <input type="checkbox"/> Other: _____ <input type="checkbox"/> Storm Drain
5. Discharge Quantification Estimated flow rate of discharge (gpm): _____ Total estimated amount of discharge (gal.): _____ Method of estimation: <input type="checkbox"/> Meter <input type="checkbox"/> Calculation <input type="checkbox"/> Rough est.	7. Was a photo taken (if yes, please attach) <input type="checkbox"/> Yes <input type="checkbox"/> No
8. What is the source of discharge? <input type="checkbox"/> Source unknown, fill out sections 9 to 11 <input type="checkbox"/> Source known, skip to section 12	
9. Describe Odor: (check all that apply) <input type="checkbox"/> None <input type="checkbox"/> Musty <input type="checkbox"/> Rotten Eggs (Sulfur) <input type="checkbox"/> Chlorine <input type="checkbox"/> Gas/Petroleum <input type="checkbox"/> Rotten/Spoiled <input type="checkbox"/> Other: _____	
10. Describe Color: (check all that apply) <input type="checkbox"/> Red <input type="checkbox"/> Yellow <input type="checkbox"/> Brown <input type="checkbox"/> Green <input type="checkbox"/> Gray <input type="checkbox"/> White <input type="checkbox"/> Other: _____	
11. Solids/Floatables: (check all that apply) <input type="checkbox"/> Garbage <input type="checkbox"/> Toilet Paper <input type="checkbox"/> Oil Sheen <input type="checkbox"/> Sawdust <input type="checkbox"/> Scum <input type="checkbox"/> Solvents <input type="checkbox"/> Unknown	
12. Method of Clean Up and Removal:	
13. How to prevent reoccurrence? (if applicable):	

D. Agencies to Contact ASAP

14. ALL Spills/Discharges (within 24-hours) Department of Ecology 360-407-6300 <input type="checkbox"/> Notified	15. Marine Water Bacterial Contamination (e.g discharges resulting from broken sewer lines and failing onsite septic systems) Dept. of Health – Shellfish 360-789-8965 <input type="checkbox"/> Notified <input type="checkbox"/> N/A	16. Oils or Hazardous Substances WA Emergency Management Division 1-800-250-5990 <input type="checkbox"/> Notified <input type="checkbox"/> N/A
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Date:	Time:	Date:	Time:	Date:	Time:
ERTS #:	Rep Name:	Notes:		Notes:	

Notified Supervisor

Inspector Signature _____

Note: Upon completion, submit form and all pertinent documentation to Supervisor.

(Published: May 2022)

INSTRUCTIONS FOR COMPLETING IDDE REPORTING FORM

- C. First person who witnessed and reported the discharge.
- D. City staff performing the inspection and mitigation of the discharge.
- 9. Description of discharge location.
- 10. Provide an estimate of when the last rainfall event occurred.
- 11. Date and time of when the discharge started and ended.
- 12. Describe the nature of the discharge or flow frequency.
- 13. Estimate the total amount of discharge that have occurred.
- 14. How did the discharge enter the municipal storm sewer system (MS4)? A MS4 is a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains).
- 15. Provide any photos if available.
- 16. Describe the source of the discharge if known.
- 9 to 11. Source identification: Determine the source of the discharge. Perform follow up site visit and/or further investigate to eliminate the source.
- 17. What method was used to clean up the discharge and how was it removed?
- 18. Is there anything that can be done to prevent future reoccurrence?
- 19. Notify Ecology of all spills or discharges within 24-hours.
- 20. Notify Department of Health - Shellfish
- 21. Notify Washington Emergency Management Division if the discharge was oil or hazardous substances.

WHAT IS AN ILLICIT DISCHARGE:

An illicit discharge is any discharge into the storm sewer system (MS4) that is not composed entirely of storm water. Examples:

- Dry weather discharges of wastewater into the storm sewer system from illegal dumping; spills and other non-storm water pollution sources
- Discharges of pollutants, contaminants or illicit materials into storm drainage/sewer systems (oils, grease, solvents, metals, nutrients, toxics, viruses, bacteria)
- Improper antifreeze, oil disposal from vehicle maintenance, service stations
- Vehicle washing wastewaters
- Auto body/repaid 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 bard waste waters
- On-lot disposal system-sewage effluent
- Water from water features (e.g fountains), often contains chemicals.
- Swimming pool water



SANITARY SEWER OVERFLOW (SSO) REPORTING FORM

I. Staff Member Reporting SSO

Name:	Contact Phone Number:
Date SSO Discovered:	Time SSO Discovered:

II. Inspector/Supervisor Information

Name:	Contact Phone Number:
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III. SSO Discharge Information (To Be Completed By Staff Member Reporting SSO)

1. Location (address/nearest intersection/landmark):	
2. Discharge Start/Stop Times: Date & Time Discharge <input type="checkbox"/> started OR <input type="checkbox"/> was first witnessed: Date: _____ Time: _____ Date & Time Discharge ended: Date: _____ Time: _____	3. Area Affected By Discharge (check all that apply): <input type="checkbox"/> Ground/Yard <input type="checkbox"/> Surface Water* <input type="checkbox"/> Storm Drain* <input type="checkbox"/> Roadside Ditch* <input type="checkbox"/> Storm Pond* <input type="checkbox"/> Inside Building/Home** <input type="checkbox"/> Other: <i>*If Surface Water, Storm Drain, Roadside Ditch or Storm Pond are affected, City's Stormwater Coordinator must be notified.</i> <i>**Notify supervisor <u>immediately</u> if spill damages the inside of building/home.</i>
4. Source of Discharge: <input type="checkbox"/> Manhole <input type="checkbox"/> Pump Station <input type="checkbox"/> Pipe <input type="checkbox"/> Septic Tank <input type="checkbox"/> Other: _____ 5. Discharge Quantification: Estimated Flow Rate of Discharge (gal./minute): _____ Total Estimated Amount Discharged (gal.): _____ Method of Estimation: <input type="checkbox"/> Meter <input type="checkbox"/> Calculation <input type="checkbox"/> Rough Est.	6. Discharge Characterization: What Was Discharged?: <input type="checkbox"/> Raw Sewage <input type="checkbox"/> Septic Tank Effluent <input type="checkbox"/> Septic Solids <input type="checkbox"/> Other _____ Nature of flow: <input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent Time Between Discharges: _____
7. What caused the discharge?:	
8. What was done to stop the discharge?:	
8. Method of clean up and removal:	
Was Lime Applied to the Affected Area?: <input type="checkbox"/> Yes <input type="checkbox"/> No	
9. What was done to prevent reoccurrence? (if applicable):	
10. Were photos taken? <input type="checkbox"/> Yes <input type="checkbox"/> No (If yes, please print & attach or forward to supervisor.)	

IV. Agencies/Persons to Contact ASAP

1. ALL Spills/Discharges (Report ASAP) <u>WA Department of Ecology</u> (800) 258-5990 (SERC Hotline)	2. ALL Spills/Discharges (Report ASAP) <u>Clark County Public Health Dept.</u> M-F, 8A-5P: (564) 397-7381 AFTER HRS: (360) 518-2755	3. ANY Discharges that affect MS4 <u>Brian Monnin, City of Camas</u> (360) 817-7388
Incident #: _____ ERTS #: _____	<input type="checkbox"/> Spoke To : _____ <input type="checkbox"/> Left Message	<input type="checkbox"/> Spoke With Brian <input type="checkbox"/> Left Message
Date: _____ Time: _____	Date: _____ Time: _____	Date: _____ Time: _____
Notes:	Notes:	Notes:

Inspector/Supervisor Signature _____

INSTRUCTIONS TO COMPLETE SANITARY SEWER OVERFLOW REPORTING FORM

What is a Sanitary Sewer Overflow (SSO)?

- A Sanitary Sewer Overflow, or “SSO”, is when untreated or partially-treated sewage is discharged into the environment prior to reaching the wastewater treatment facility.

What is the Purpose of the SSO Reporting Form?

- Section E of the The City’s NPDES permit requires that all SSOs must be reported to the Department of Ecology and local health department, and specifies what the reports must contain. This form facilitates the documentation and reporting process so that we comply with our NPDES permit.

FORM SECTIONS

Part I. Person Reporting Sanitary Sewer Overflow (SSO)

- This is the person who first witnesses or was dispatched to investigate the SSO.

Part II. Inspector/Site Supervisor Information

- This part is to be filled out by the person who follows-up on the spill, to insure all reporting and necessary response procedures are followed. This will typically be the lead or supervisor of the person listed in Part I.

Part III. SSO Discharge Information

1. Location

- When possible, indicate a street address where the SSO is located. You can also use the nearest intersection, nearest landmark, or City site name to identify a location.

2. Discharge Start/Stop Times

- Indicate the start and stop times, including date and time. Mark the appropriate checkbox to note if the start time was when the spill actually began or when it was first witnessed.

3. Area Affected by Discharge

- Mark the appropriate checkbox or write in the area affected by the spill.
- If a spill affects the City’s Stormwater System (aka the MS4), the City’s Stormwater Coordinator must be notified. See Section IV, part 3.
- If a spill causes damage to the interior of a private building, notify your Supervisor immediately.

4. Source of Discharge

- Mark the appropriate checkbox or write in the source of the spill.

5. Discharge Quantification

- If you observe an ongoing spill, provide an estimate the flow rate of the discharge. See SSO Reporting Procedure for suggestions on how to estimate flow rate. If the flow rate changes throughout the spill, please note that along with flow estimates.
- If you arrive on site after the spill has stopped, write “N/A” indicating that this item is not applicable.

6. Discharge Characterization

- What was Discharged?
 - Indicate the type sanitary wastewater discharged. The type can be determined by the source of the overflow. Examples:
 - Gravity Sewer Main = “Raw Sewage”
 - Septic Tank Lid = “Septic Effluent”
 - Septic Pump Truck = “Septic Solids”
- Nature of Flow
 - Indicate if the SSO discharge is/was flowing continuously or if it was intermittent (off & on, like a pump station discharge). If the flow was intermittent, note how much time between the stop and start of the flow.

7.W hat caused discharge?

- Describe what caused the SSO to occur. Provide as much detail as possible.

8.W hat was done to stop the overflow?

- Describe the steps taken to stop the overflow.

9.M ethod of clean up and removal

- Describe the steps taken to clean up the spill.
- To help kill , we are required to apply lime to spill areas

10.Wh at was done to prevent reoccurrence?

- If anything was done to help prevent the same or similar SSO from occurring again, please describe those measures here.

11.We re photos taken?

- Take photos of the spill if possible and include them when submitting the written report to your supervisor.

Part IV. Agencies/Persons to Contact ASAP

1.W A Department of Ecology

- All SSO spills must be verbally reported to the Department of Ecology. To contact Ecology by phone, you must first contact the WA State Emergency Response Commission (SERC) call center at (800) 258-5990. SERC will then forward your information to the Dept. of Ecology, and an Ecology representative will call you back.
- Document the date and time that you first call the SERC call center, as well as the Incident Number that they provide you.
- A Dept. of Ecology representative will then call you at the number you provided to the SERC call center. When Ecology calls you back, please document the Environmental Report Tracking System (ERTS) number that they provide you.

2.C lark County Public Health Dept.

- All SSO spills must be verbally reported to the Clark County Public Health Department (CCPHD). Please call the appropriate phone number depending on the day and time.
- If you reach their voicemail. Leave a short message notifying of the spill and area affected, making sure to leave your name and phone number for a return call.
- Mark the appropriate check box, depending on whether you speak with a CCPHD official or if you leave a voicemail message. If you speak to an official, please indicate their name.
- Document the date and time that you call CCPHD, along with any notes regarding the call.

3.J ackie Caldwell (City of Camas Stormwater Permit Coordinator)

- Any SSO spills that reach a Municipal Sanitary Storm Sewer System (a.k.a. “MS4”) must be reported to Brian Monnin, the City’s Stormwater Permit Coordinator.
- If you reach Brian’s voicemail. Leave a short message notifying of the spill and area affected, making sure to leave your name and phone number for a return call.
- Mark the appropriate check box, depending on whether you spoke with Brian or left a message.
- Document the date and time that you call Brian, along with any notes regarding the call.

Inspector/Supervisor Signature

- The Inspector/Supervisor listed in Part II above, must sign the form to indicate all of the provided information is as complete and accurate as possible.

Once completed and signed, the SSO form must be scanned and emailed to the WWTP Operations Supervisor and Utilities Director.

- The WWTP Operations Supervisor will review the report, attach a signing statement, and submit the completed report to the Department of Ecology.
- Please note that the written report must be submitted to the Department of Ecology within five days of the City becoming aware of the spill.