

STORMWATER BMPs: ILLICIT CONNECTIONS & ILLEGAL DISCHARGE REPORTING

AFFECTED FACILITIES OR PERSONNEL

These BMPs apply to all employees and municipal contractors (examples: building inspectors, fire inspectors, water utility, storm drainage and street maintenance personnel) who work out in the field or on city streets.

BACKGROUND

Storm drainage systems have often been misused for waste disposal. Illegal discharges come from two sources: (a) illicit connections (permanent, hard-piped connections) into storm drainage systems and (b) illegal dumping (“midnight dumping”) of wastes into storm drain inlets and drainage ditches.

Illicit connections are more common in older buildings and may have been in place for decades and are often discovered during building remodels, additions or renovations.

Illicit connections may include discharges of sanitary sewerage, process wastewater, cooling water, floor drains, boiler or compressor blow-down and/or septic systems.

Illegal dumping may consist of pouring cleaning wastes, spent solvents, spent degreasers, turpentine from paint cleaning and scraps into the street or storm drain system. Also, illegal disposal of landscaping wastes like grass clippings, leaves, tree trimmings and weeds or hazardous waste such as industrial chemicals, pesticides and used oil in or near storm drains or into public streets. Illegal discharges also include allowing wastewater from vehicle or equipment cleaning on commercial property (especially cleaning with solvents or soaps) to flow into storm drainage systems.

BEST MANAGEMENT PRACTICES

- All municipal and county employees and contractors should stay alert for evidence of illicit discharges or the threat of an illicit discharge into the storm sewer system at any point or any time.
 - Evidence of illicit connections (hard-piped, permanent connections into the storm drainage system) includes: (a) any dry weather flows and (b) discolored or odorous wet weather flows in storm drainage systems.
 - Evidence of illicit dumping includes: (a) staining or discoloration of storm drain inlets and drainage ditches, (b) unsealed, empty or overturned containers sitting in or near storm drainage systems, (c) hoses or flexible piping running into storm drainage systems and (d) open drain valves or pipes on secondary containment. Illicit dumping may also be observed as it happens as in the case of a facility that steam cleans its’ mobile equipment or vehicles over or near a storm drain inlet or next to a roadside drainage ditch.
- When any employee or contractor discovers evidence of an illicit discharge or illicit connection, it should be reported to their supervisor or the city storm water coordinator immediately. Describe the evidence noted, the exact location and the exact time and date of the observation and take photographs.

Note: Discharges that are *allowed* to enter storm drainage systems include the following: water line flushing or other potable water sources (de-chlorinated and

filtered to capture sediment), landscape irrigation or lawn watering, diverted stream flows, rising groundwater, uncontaminated infiltrating or pumped ground water, foundation or footing drains, crawl space pumps, air conditioning condensate, springs, natural riparian habitat or wetland flows, de-chlorinated swimming pool flows (requires State Discharge Permit), emergency fire fighting activities, dye testing (with prior notification) and any other water source not containing pollutants.

REQUIRED STRUCTURES AND EQUIPMENT

- None

INSTALLATIONS REQUIRED FOR NEW CONSTRUCTION OR RENOVATIONS

- New construction, remodel, addition or renovation cannot include any illicit connections.
- Any illicit connection discovered during a remodel, renovation, remodel or addition must be immediately disconnected.

REQUIRED EMPLOYEE TRAINING

- Train all employees who perform building maintenance, parks maintenance, vehicle maintenance, storm drain system maintenance and street maintenance on this BMP.
- Train all new hires and job transferees who will conduct building maintenance, parks maintenance, vehicle maintenance, storm drain system maintenance and street maintenance on this BMP.
- Conduct refresher training for all employees who conduct building maintenance, parks maintenance, vehicle maintenance, storm drain system maintenance and street maintenance on this BMP.
- Contracts should stipulate that all contracted employees have been trained in proper stormwater management BMPs.

REQUIRED MAINTENANCE

- None

RECORDS

- Keep records of employee trainings.
- Keep records of all reports of suspected illicit discharges.

REFERENCES

1. Colorado's Phase II Municipal Guidance, October 2001
2. *City of Tacoma: Surface Water Management Manual (Vol. IV Source Control BMPs)*, January 2003
3. *Municipal Facility Runoff Control Plan* (City of Lakewood, CO)
4. *Best Management Practices for Industrial Storm Water Pollution Control* (Santa Clara Valley, CA)
5. Keep it Clean Partnership Stormwater Illicit Discharge Ordinances and Stormwater Program Coordinators <http://www.keepitcleanpartnership.org>