

CHAPTER THREE

ILLCIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

Permit Requirement 4.2.3. Development and Implementation of the IDDE program

The Illicit Discharge Detection and Elimination Program section of this SWMP addresses non-storm water flows that are discharged to receiving waters through storm water conveyance systems. The program will implement BMPs to assist in the identification of illicit discharges detection and elimination of these discharges from the system. This program will also focus on prevention of new illicit discharges to the storm water system by means of education, regulations, and a spill prevention and response program.

This program will also be integrated with the Public Education and Outreach program to promote awareness of the importance of protecting the storm water system from illicit discharges and their impact to receiving waters. The following BMPs describe implementation tasks and assessment tasks to be completed by the City for the Illicit Discharges and Improper Disposal Program.

The Cities' IDDE program description and procedures are included in Appendix A of the SWMP (in the Storm Water and Sewer O&M Manual)

STORM DRAIN SYSTEM MAP

Permit Requirement: 4.2.3.1. Map

The Storm Water Division and GIS Department will maintain and update a storm drain system map showing the location of all municipal storm sewer outfalls with the names and location of all the waters of the State that receive discharges from the MS4 storm water conveyance system. This information is also available using the Springville City asset management software.

Lead Entity: Storm Water Division Lead Man in coordination with the GIS Department

Year	Measurable goal action summary:	Document number of storm water infrastructure, facilities and outfalls mapped
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

ORDINANCE

Permit Requirement: 4.2.3.2. Ordinance to prohibit illicit discharge

- Title 4 Chapter 13 Illicit Discharge: The City has implemented a storm drainage ordinance that prohibits discharges to the storm drain system that may degrade the water quality. It includes: prohibited discharges, prohibited obstructions, illicit connections and illicit discharges or spills. Sanitary over flows will be covered on the permit requirement section 4.2.3.6. of this chapter.
- Title 4 Chapter 12 Storm Water Utility: The City has adopted a variety of enforcement options in order to apply escalating enforcement procedures as necessary for the severity of violation. **Pursuant to permit requirement 4.2.3.2.1**, this section of the ordinance gives the City the right of entry to any facility subject to this ordinance.

The Engineering Division, Legal Department and Storm Water Division will continue to update the Storm Water Ordinance to effectively prohibit illicit discharges, spills, illicit connections, illegal dumping and sanitary sewer overflows; any changes will be documented on table below.

Lead Entity: Legal Department- City Attorney, Engineering Division- City Engineer, Storm Water Division - Superintendent

Year	Measurable goal action summary:	Document updates to the ordinance
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement: 4.2.3.3. Development and implementation of the dry weather screening program

The City Storm Water Division as part of their Operation and Maintenance (O&M) Manual has developed and adopted a written plan to detect and address non-storm water discharges to the MS4, including spills, illicit connections, sanitary sewer overflows and illegal dumping. The plan shall include:

Permit Requirement 4.2.3.3.1 Program procedures for locating priority areas

The Engineering and Storm Water Divisions will create written systematic procedures for locating areas likely to have illicit discharges by **July 2016**, the criteria for selecting these areas will include:

- Areas with older infrastructure that are more likely to have illicit connections;
- Industrial, commercial, or mixed used areas;
- Areas with a history of past illicit discharges;

- Areas with a history of illegal dumping;
- Areas with onsite sewage disposal systems;
- Areas with older sewer lines or with a history of sewer overflows or cross-connections; and
- Areas upstream of sensitive water bodies.

The Engineering and Storm Water Divisions will create a list of priority areas identified in the system based on the type of industrial use and water consumption for the industrial operation and CCTV inspections of the storm drain system. The list will be updated once a year to reflect changing priorities by the Storm Water/Sewer Collections Department and will be kept on the department's O&M Manual electronic file.

Permit Requirement 4.2.3.3.2 Priority Area Outfalls Inspections

The Storm Water Division will conduct field assessment of areas which are considered a priority area as identified in Permit Part 4.2.3.3.1. Compliance with this provision shall be achieved by inspecting each priority area annually at a minimum. Field assessment activities will be documented on an inspection form.

Lead Entity: Storm Water Division

Year	Measurable goal action summary:	Document number of priority area out falls inspected
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement 4.2.3.3.3 Dry Weather Outfalls inspections

The Storm Water Division will conduct field assessment activities for the purpose of verifying outfall locations and detecting illicit discharges during the month of November until weather permitting. Visual inspections of at least 20 percent of all known outfalls will be inspected annually and all outfalls should be inspected at least once during the 5 year permit term. Field assessment activities will be documented on an inspection form.

Lead Entity: Storm Water Division

Year	Measurable goal action summary:	Document number of out falls inspected
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		

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Year	Measurable goal action summary:	Document number of out falls inspected
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement 4.2.3.3.4 Industrial Storm Water Permit

If Springville City discovers or suspects that a discharger may need a separate UPDES Permit (e.g., Industrial Storm Water Permit, Dewatering Permit), Springville City shall notify the Division. Springville City will use the State Division of Water Quality web site to determine if a particular business already has an industrial permit.

Lead Entity: Storm Water Division

Year	Measurable goal action summary:	Document number of industries reported to the DWQ Industrial Activities Program
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement 4.2.3.4. Tracing a source of an illicit discharge

The Storm Water Division will update and implement standard operating procedures on its O&M Manual for tracing the source of an illicit discharge or connections; the procedures will include: visual inspections and closed circuit camera inspections, and when necessary collecting and analyzing water samples.

Permit Requirement 4.2.3.5. Responding to an illicit discharge

The Storm Water Division will update and implement procedures on its O&M Manual for characterizing the nature of, and the potential environmental threat posed by an illicit discharge found by or reported by the public through the Police Department's dispatch phone number or advertized illicit discharge phone number. These procedures will include detailed instructions for evaluating how the discharge shall be immediately contained and steps to be taken for containment of the discharge. The department will investigate the source and will involve other parties if necessary.

Permit Requirement 4.2.3.5.1 IDDE Inspection Report

After the source of a non-storm water discharge is identified and confirmed, the Storm Water Division will record the following information on an inspection report that will contain:

- The date the City became aware of the non-storm water discharge,
- The date the City initiated the investigation of the discharge;
- The date the discharge was observed,
- The location of the discharge;
- The description of the discharge;
- The method of discovery;
- The date of removal or repair or enforcement action;
- The method of removal
- The method of removal verification
- The decision process for utilizing analytical monitoring/sampling to aid in the identification of the potential source of an illicit discharge and to characterize the nature of an illicit discharge will be documented in the inspection report.

Lead Entity: Storm Water Division Personnel

Year	Measurable goal action summary:	Document number of out falls inspected
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement 4.2.3.6. Ceasing of illicit discharges

Upon detection on an illicit discharge the Storm Sewer Collections Department or its appointees will require the immediate cessation of improper disposal practices upon confirmation of the responsible parties.

The Storm water/Sewer Collections Department will develop and implement standard operating procedures on its O&M Manual for ceasing illicit discharges that will include:

- Notification of appropriate authorities;
- Notification of the property owners;
- Technical assistance for removing/eliminating the source of the discharge;
- Follow-up inspections; and
- Enforcement and legal actions if the discharge is not eliminated.

Permit Requirement 4.2.3.6.1 IDDE investigation documentation

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The Storm Water Division or its appointees will thoroughly investigate and document all illicit discharges. All of the investigation documentation will be kept on the Storm Water Division O&M manual and the SWMP electronic files.

Lead Entity: Storm Water Division Personnel.

Year	Measurable goal action summary:	Document number of cases found or responded to.
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

IDDE EDUCATION AND PUBLIC OUTREACH

Permit Requirement 4.2.3.7. Improper disposal of waste information

Chapter One Public Education and Outreach Program cover this requirement.

Permit Requirement 4.2.3.8. Household hazardous waste collection

Chapter One Public Education and Outreach Program cover this requirement.

Permit Requirement 4.2.3.9. Reporting Hotline or other local telephone number

The Public Works Department phone number (801-491-2780) is the one listed and advertized to the public for the reporting of spills and other illicit discharges. The public may also call the Police or Fire Departments to report any of these activities. The Public Works Administration Division and Storm water Division will document the number of calls received and follow-up actions taken, and any feedback received from public education efforts.

Lead Entity: Public Works Administration, Storm Water Division Superintendent.

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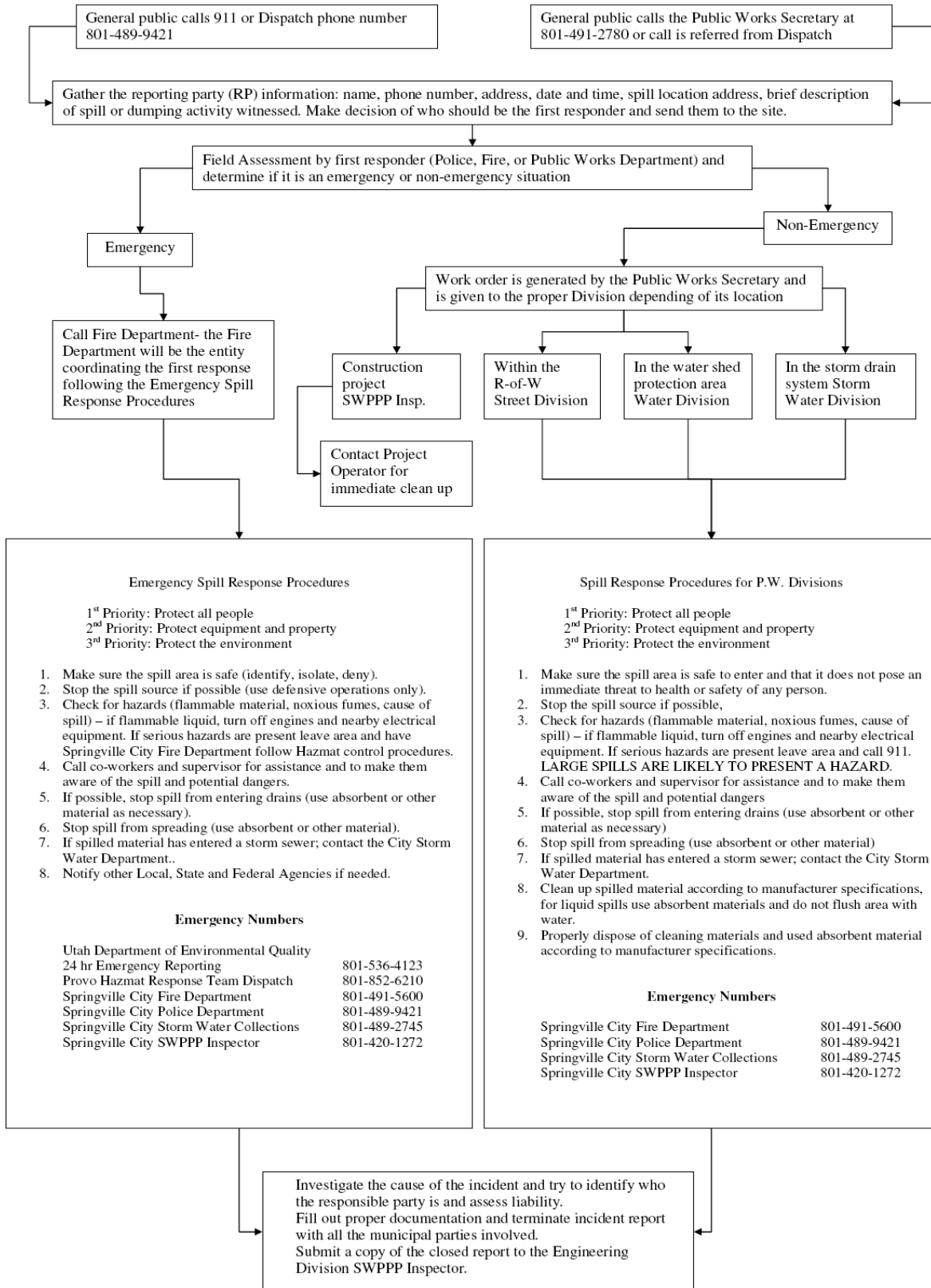
Year	Measurable goal action summary:	Document number of calls received.
7/1/2016 - 6/30/2017		
7/1/2017 - 6/30/2018		
7/1/2018 - 6/30/2019		
7/1/2019 - 6/30/2020		
7/1/2020 - 6/30/2021		

Permit Requirement 4.2.3.9.1 Spill response procedures

The Engineering Division as administrator of the SWMP in conjunction with the Storm Water Division, Fire and Police Departments have developed a written spill/dumping response procedure (Spill response flow chart was created on 11/15/10) and flow chart for internal use, that shows the procedures for responding to illicit discharges/spills, the various responsible agencies and their contacts, and who would be involved in illicit discharge incidence response. The procedure and list will be incorporated as part of the IDDE program and incorporated as part of each department's O&M Manual IDDE program. This plan will be updated as changes occur.

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Springville City Spill/Dumping Response Plan



Permit Requirement 4.2.3.10 IDDE Program evaluation

The Storm Water Division and Engineering Department have adopted procedures for the IDDE program evaluation and assessment that include a database for mapping, tracking of the number and type of spills or illicit discharges and inspections conducted. This information is kept on electronic form using the City's asset management software.

Permit Requirement 4.2.3.11 IDDE employee training

The Engineering and Storm Water Divisions will develop an IDDE training that shall at a minimum, ensure that all staff, contracted staff and all new hires are trained immediately upon hire, or other responsible entities receives annual training in the IDDE program including identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, improper disposal, and illicit connections. Follow-up training shall be provided as needed to address changes in procedures, methods or staffing. The City shall also provide training to all field staff that as part of their normal job responsibilities might come into contact with or otherwise observe an illicit discharge or illicit connection to the MS4. The City shall also train office personnel who might receive initial reports of illicit discharges.

Training shall include how to identify a spill, an improper disposal, or an illicit connection to the MS4 and proper procedures for reporting the illicit discharge.

Training records must be kept and shall include dates, activities or course descriptions, and names and positions of staff in attendance. The City will include a summary of such training in the annual report. (This item will be document and described at more length on section 4.2.6.10)

Permit Requirement 4.2.3.12.

"The Division reserves the right to request documentation or further study of a particular non-storm water discharge of concern, to require a reasonable basis for allowing the non-storm water discharge and excluding the discharge from the Permittee's program, and to require inclusion of the discharge in the Permittee's program, if water quality concerns can not otherwise be reasonably satisfied."