



ADDRESSING ILLICIT DISCHARGES: DETECTION AND ELIMINATION

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Storm Water Management

Topics

- **Background and Definitions**
- **Detection**
- **What you can do**

Legal and Regulatory Background

- **Phase I Requirements [40 CFR 122.26(d)]**
 - **Stormwater Management Program**
 - **Detect and Eliminate Non-Storm Water Discharges**

Legal and Regulatory Background

- **Phase II Requirements (64 FR 68722 – December 8, 1999)**
 - **Minimum Control Measures**
 - **Illicit Discharge Detection and Elimination**
 - Storm Sewer Map
 - Regulatory mechanism to prevent illicit discharges
 - Plan to detect & address non-storm water discharges
 - Education
 - BMP's and Measurable goals

What is an Illicit Discharge?

A discharge to an MS4 that is **not composed entirely of storm water** except permitted discharges and fire fighting related discharges [40 CFR 122.26(b)(2)]

What is an Illicit Discharge?

Acceptable Discharges [40 CFR 122.26(d)]

- **Water Line Flushing**
- **Landscape Irrigation**
- **Diverted Stream Flows**
- **Rising Ground Waters**
- **Uncontaminated Ground Water Infiltration**
- **Uncontaminated Pumped Ground Water**
- **Discharges from Potable Water Sources**
- **Foundation Drains**
- **Air Conditioning Condensation**
- **Irrigation Water**
- **Springs**
- **Water from Crawl Spaces**
- **Footing Drains**
- **Lawn Watering**
- **Individual Residential Car Washing**
- **Flows from Riparian Habitats and Wetlands**
- **Dechlorinated Swimming Pool Discharges**
- **Street Wash Water**

What is an Illicit Discharge?

Examples of Potential Sources

Illegal dumping practices



Source: Center for Watershed Protection

What is an Illicit Discharge?

Examples of Potential Sources

Broken sanitary sewer line



Source: Ft. Worth Department of Environmental Management

What is an Illicit Discharge?

Examples of Potential Sources

Straight pipe sewer discharge



Source: Center for Watershed Protection

What is an Illicit Discharge?

Examples of Potential Sources

Connection of floor drains to storm sewer



Source: Center for Watershed Protection

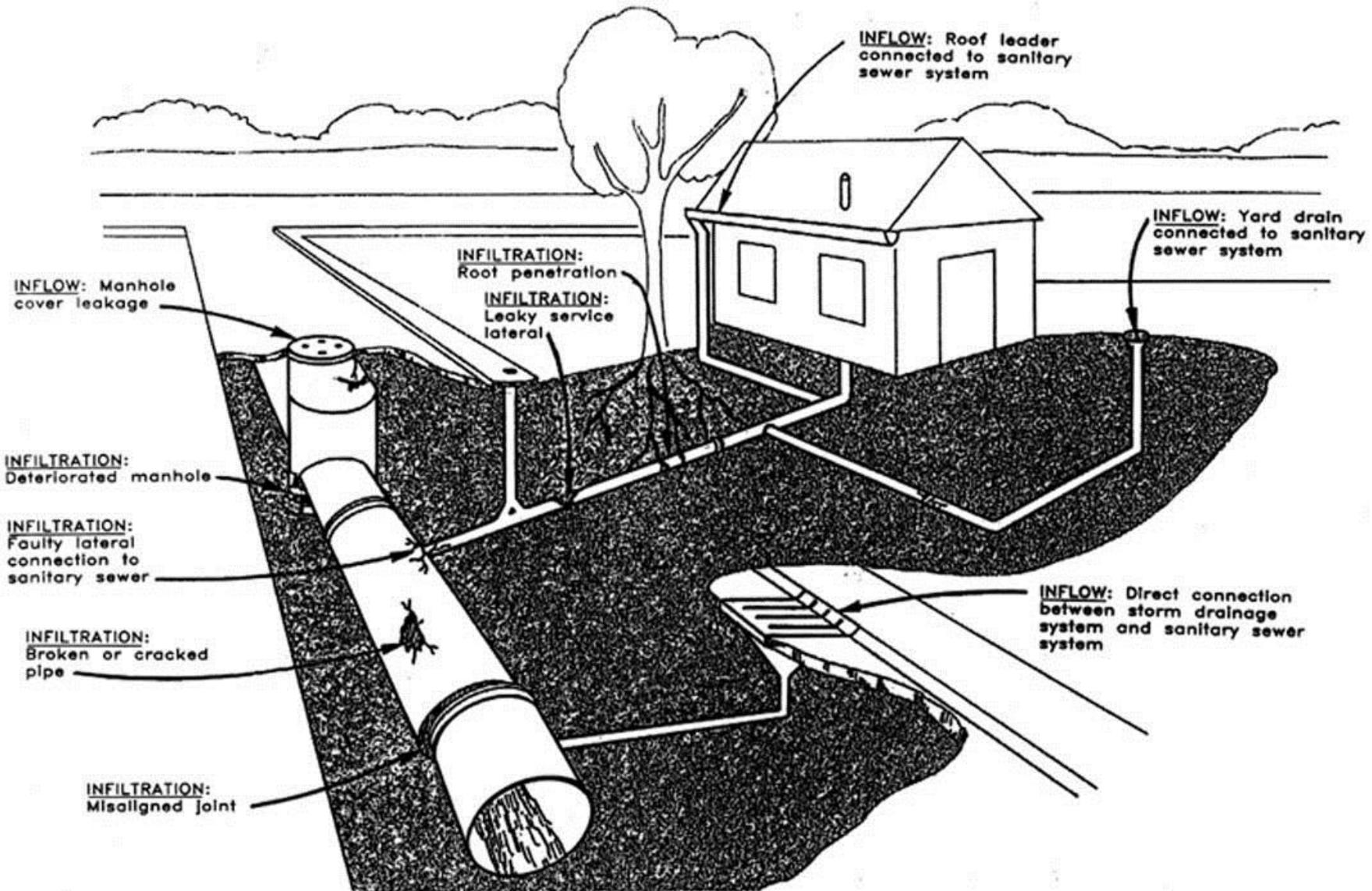
What is an Illicit Discharge?

Examples of Potential Sources

Failing septic systems



Source: Center for Watershed Protection



SANITARY SEWER PROBLEMS

Infiltration



What is an Illicit Discharge?

Examples of Potential Sources

Sanitary Sewer Overflows



Source: USEPA Region 6 Compliance and Enforcement

What is an Illicit Discharge?

Discharge Frequency

- Continuous discharges
 - Occur *most or all of the time*



What is an Illicit Discharge?

Discharge Frequency

- Intermittent discharges
 - Occur over a *shorter period of time* (e.g., a few hours per day or a few days per year)



What is an Illicit Discharge?

Discharge Frequency

- Transitory discharges
 - *Occur rarely*



Source: City of Ventura, CA

What is an Illicit Discharge?

Modes of Entry

Direct entry

- Residential, industrial, or commercial cross-connection
- Construction Site Runoff



Source: Center for Watershed Protection

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What is an Illicit Discharge?

Modes of Entry

Indirect entry

- **Runoff from commercial washing activities**
- **“Nuisance” or non-target water**
- **Spills**
- **Dumping**
- **Sewage**
 - **Inflow / Infiltration**
 - **SSO's**





- **Sewerage & Water Board of New Orleans**
Hot Line for reporting spill, leaks, overflows and dumping into drains, broken water lines, SSO
- **52-water or 529-2837**
- **Scott S. Finney, CET, REM**
- **Environmental Affairs Division Storm Water Management Program- 504-942-3857**