



**PROACTIVE
ILLICIT DISCHARGE AND
ELIMINATION SYSTEM
PROGRAM**
City of DeBary, Florida

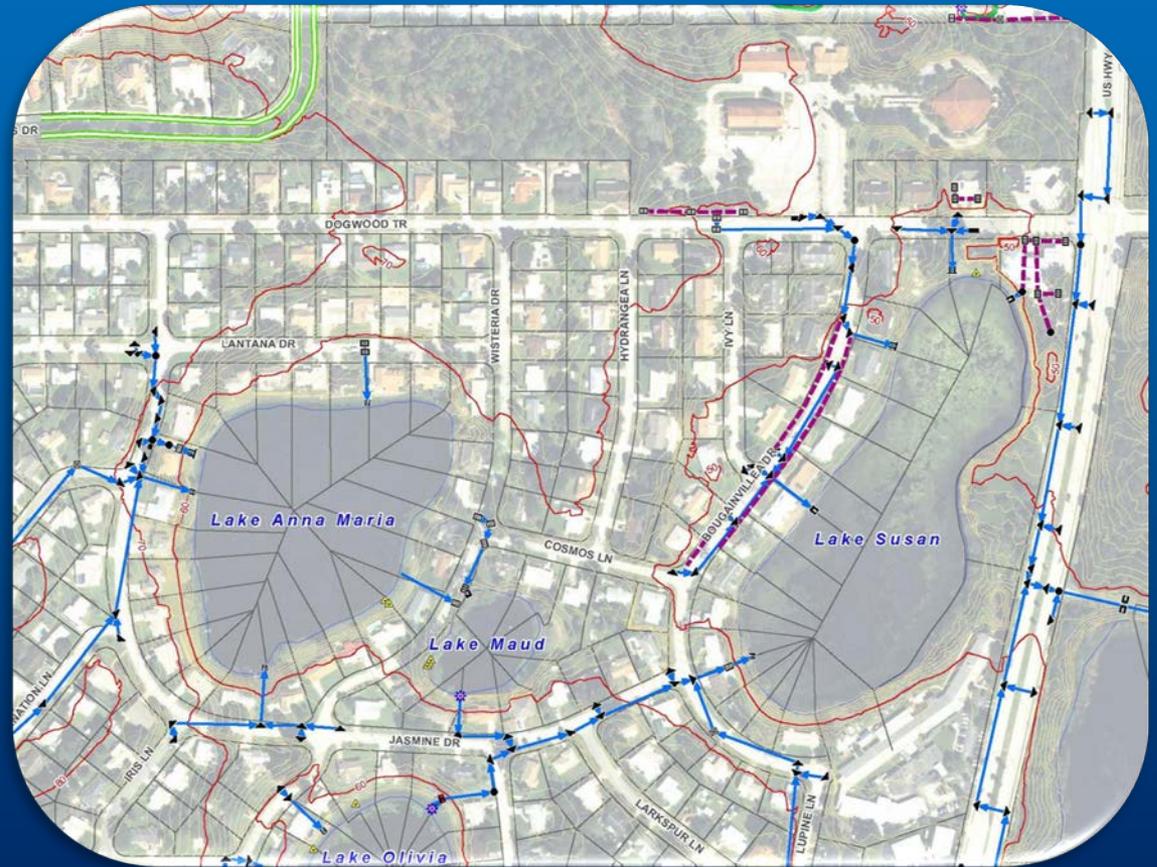
**City Council Workshop
Presentation
March 19th, 2014
6:00 p.m.**



WHAT IS A MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)?

It is the “Master Drainage System” that discharges stormwater runoff into waters of the U.S.

The “system” includes road drainage, catch basins, curbs and gutters, channels, stormwater ponds, swales, ditches, pipes, etc.



WHAT ARE ILLICIT DISCHARGES?

Any discharge to a municipal separate storm sewer system (or MS4) that is not composed entirely of stormwater runoff (except discharges resulting from fire fighting activities, air conditioning condensate, dechlorinated / desalinated swimming pool water, etc.), and may include:

- ✓ Deliberate connections or dumping
- ✓ Spills
- ✓ Contaminated runoff from sites with chemicals, raw materials, or bare soils



Common illicit discharges, in urban areas include:

- ⊘ sanitary wastewater
- ⊘ septic system effluent
- ⊘ washdown from grease traps
- ⊘ motor oil
- ⊘ antifreeze
- ⊘ gasoline and fuel spills, etc.

WHAT ARE ILLICIT DISCHARGES?

Although illicit discharges can enter the storm drain system in various ways, they generally result from:

- 💧 direct connections → wastewater piping either mistakenly or deliberately connected to the storm drains) or
- 💧 indirect connections → infiltration into the storm drain system, spills, or "midnight dumping"

Illicit discharges can be further divided into those discharging continuously and those discharging intermittently.



City Council Approval: Ordinance 02-09

In April 2009, City Council approved **City Ordinance 02-09** by adopting:

Article VII: “Control of Illicit Discharges to the Stormwater System and Waters of the State”

FINDINGS:

- (1) Pollutant contribution via storm sewer system discharges has a significant impact on receiving waters in the City.
- (2) Improperly treated discharges from spilling, dumping or disposal of material other than stormwater to the municipal storm sewer system of the City adversely affects the quality of water receiving such discharges.
- (3) USEPA has mandated the City of DeBary, through the issuance of National Pollutant Discharge Elimination System (NPDES) Permit, to control discharges to the municipal storm sewer system in order to control the quality of discharges from the City's storm sewer system to waters of the United States.

Standard Operating Procedure (SOP)

Pegasus has produced a Standard Operating Procedure (SOP) for a Proactive Illicit Discharge/Illegal Connection Inspection program, as required by the NPDES permit.

Purpose:

To identify and eliminate sources of illicit discharges, illicit connection or illegal dumping, to the City's storm sewer systems that discharge into MS4s.


City of DeBary
Proactive Illicit Discharge/Illegal Connection Inspection Program

Section A.11.3b.2 of the City of DeBary's Notice of Intent to Use Generic Permit for Discharge of Stormwater from Phase II Municipal Separate Storm Sewer Systems (also referred to as "NOI"), dated July 2009, refers to Ordinance 02-09, which defines an illicit connection, illicit discharge, and inspection and monitoring for compliance. Also defined are stormwater discharge from industrial, commercial, and construction activities, control of pollutant contributions from interconnected municipal storm sewer systems, and enforcement, penalties, and legal proceedings. Section A.11.3c.1 of the NOI refers to the City's commitment to develop and implement a program to detect, eliminate, document and report illicit discharges and illegal dumping.

This permit element requires a written **Proactive Inspection Program** for identifying and eliminating sources of illicit discharges, illicit connection or illegal dumping, to our MS4.

Portions of the City's Municipal Separate Storm Sewer Systems that have a reasonable potential of containing illicit discharges / connections / dumping, such as the commercially zoned areas/properties, are required to be inspected annually. FDEP allows these inspections to be combined with other inspection programs, but the inspections must include specific inspection for potential stormwater contamination. Note that Volusia County Environmental Management also inspects businesses located within the City of DeBary that have a Hazard Waste fee. These inspections take place at least once within the current five-year permit term.

1. Procedure and Criteria for identifying priority areas/facilities

For consistency with the Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit, the following areas are considered a priority in the inspection program:

- Industrial, commercial, or mixed use areas
- Areas with history of past illicit discharges and/or illegal dumping
- Areas with on-site sewage disposal systems
- Areas upstream of sensitive or impaired water bodies

The attached map depicts the areas zoned as industrial or commercial, that lie within the City of DeBary MS4 contributing area or in an area that discharges from an outfall for which the City is responsible.

problem has been corrected.

If no source is identified, the findings are reported to the inspector's supervisor for further investigation.

City's Safety Coordinator. Documentation is handled by the Records Manager/Data Analyst. Code officers are called in as needed.


Proactive Illicit Discharge/Illegal Connection Inspection Form

Date of inspection: _____ Inspector Name: _____

New Inspection Follow-up Inspection

Address of Facility OR General Description of Area Inspected: _____

Identification of MS4 component that could receive discharge from this site/area: _____

If Facility inspection, does type of business require an MSGP? Yes ___ No ___

If yes, does this facility have one? Yes ___ No ___

Description of inspection area: _____

Identification of MS4 component that could receive discharge from this site/area: _____

Findings:

Evidence of illicit connections to storm sewer? Yes ___ No ___	Storage tanks leaking or improperly contained? Yes ___ No ___
Evidence of dumping/spills to storm sewer? Yes ___ No ___	Stockpiles/debris piles uncontained? Yes ___ No ___
Evidence of wash water going to storm sewer? Yes ___ No ___	

If "yes," to any above, describe: _____

Type of Enforcement Action Taken: _____

Date to verify elimination: _____

Date of Referral to FDEP of facility that may require MSGP: _____

(Multi Sector General Permits require facilities to implement and maintain site-specific stormwater control measures and to develop stormwater pollution prevention plans.)

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INSPECTION PROCEDURE

1

A list of addresses is created from an overlay of existing commercial and industrial sites and Volusia County's database of businesses to be inspected by the County.

2

A GIS mapping effort locates the priority locations for field investigation.

3

A field reconnaissance takes place to identify the current status of the identified potential pollutant generators (i.e., active or inactive / closed / abandoned commercial sites).

4

An additional field investigation takes place to determine if the identified commercial sites discharge into a City MS4 via a direct connection or through a wet detention stormwater pond. This step eliminates all commercial sites that discharge into retention ponds with no outfalls.

INSPECTION PROCEDURE (continuation)

5

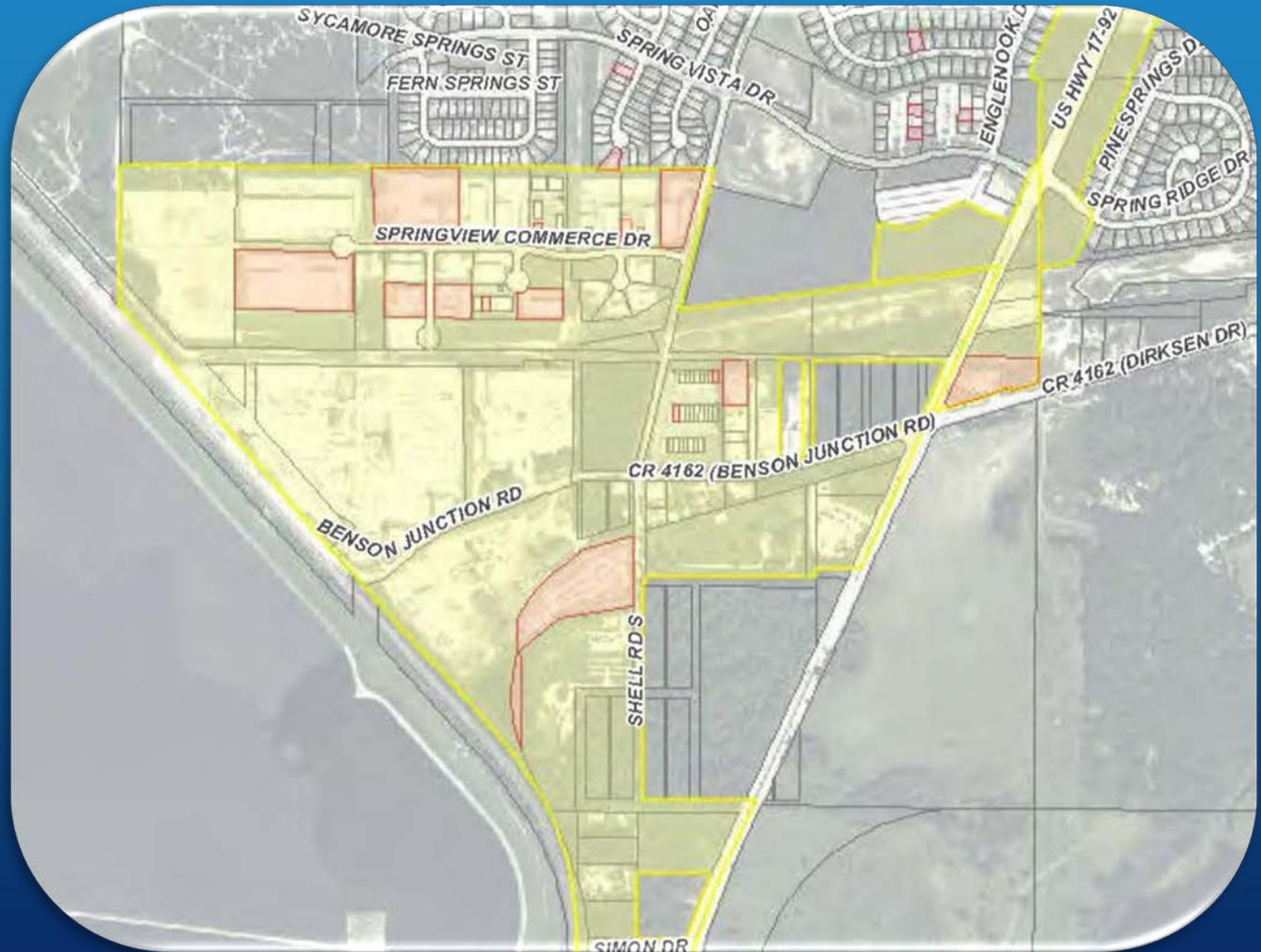
Based on the prior step, three site categories, all of which have the potential to generate illicit discharges, were generated:

- 53 sites do not discharge into a MS4 (i.e., retention ponds or landlocked basins)
- 41 sites discharge into FDOT's MS4s
- 111 sites discharge into the City of DeBary's MS4s

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The next step is to perform a formal inspection of 20% of the identified 111 sites (or 22 sites) every year. The goal is to have the entirety of sites inspected in five years.

GIS MAPPING (continuation)



LEGEND

-  CITY OF DEBARY'S INDUSTRIAL AND COMMERCIAL ZONES
-  ACTIVE DEBARY BUSINESSES WITH A HAZARDOUS WASTE FEE (CURRENTLY INSPECTED BY VOLUSIA COUNTY ENVIRONMENTAL MANAGEMENT)

Potential Hazardous Waste Generator Sites within the City of DeBary



SCALE: 1" = 1,000'
0 500 1,000 Feet



Inspection Requirements

1

City staff in charge of the inspections (Public Works personnel) will be required to receive proper training on illicit discharges identification and elimination procedures.



2

Pegasus has been tasked with providing an initial training to appropriate City personnel to be able to initiate the site inspections as soon as possible and in order to stay in compliance with NPDES requirements.



Program Results



The implementation of the Illicit Discharge Identification and Elimination Program will ensure the protection and restoration of urban waterways while reducing harmful pollutants from entering waters of the State.



QUESTIONS AND ? ANSWERS



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Thank You