DETECTING ILLICIT DISCHARGES AND ILLEGAL CONNECTIONS (IC/ID)

Workshop on

Identifying Problems
Overview

- Our MS4 Permits with the Regional Water Boards require us to inspect our facilities for spills, dumpings, illegal pipes, connections and discharges.
- Handout for your field use
- Pictures of examples - what to look for
What If We Don’t Comply?

- Under the Clean Water Act through Regional Water Boards:
  - Negligent Violations
    - Fines - Up to $25,000 per day and/or
    - Imprisonment - Up to 1 year
  - Knowing Violations
    - Fines - Up to $50,000 per day and/or
    - Imprisonment - Up to 3 years

- 3rd Party or Citizen Lawsuits
Compliance Strategies

Knowledge
- Know how to identify a problem
- Know NOT to touch a drum or container
- Know procedures for how to resolve problem

Documentation/Record Keeping
- Document all inspections
- Other requirements
What to look for:

Visual Inspection
- Color
- Odor
- Turbidity / Clarity of Water in Channel
- Floatable Material
- Stains
- Vegetation
- Structural Damage
- Sewage Flows
- Bubbles
- Liquids, solids, drums
1. **PURPOSE:** To describe the Riverside County Flood Control and Water Conservation District (RCFC) procedure for complying with California and Federal Government Regulations on Hazardous Waste and the District’s Municipal Facility Pollution Prevention Plan.

2. **SCOPE:** This procedure requires implementation at all RCFC facilities, including the main campus located at 1995 Market Street.

3. **REFERENCE REGULATIONS:**
   A. California Health and Safety Code, Division 20, Chapter 6.5, Section 25100 et al.
   B. Appendix X of Chapter 11, Division 4.5 of Title 22, CCR
   C. Title 40 Code of Federal Regulations, Part 261 Subpart D - Lists of Hazardous Waste
   D. Federal Clean Water Act, Section 402(p); including resultant National Pollution Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permits; Drainage Area Management Plan for the Santa Ana/Santa Margarita Watersheds; and District’s Individual Stormwater Management Plan

4. **APPENDICES:**
   A. Hazardous Waste Storage Information poster
   B. Procedure for Notification and Disposal of Spilled or Discovered Hazardous Materials

5. **DEFINITIONS:** Hazardous wastes include a wide range of chemical wastes. These waste are typically:
   A. Toxic (poisonous).
   B. Reactive (explosion or other violent reaction, such as fire or sudden release of heat)
   C. Ignitable (can catch fire)
   D. Corrosive (acidic or alkaline capable of causing chemical burns or corrosion to steel and other materials)
   E. The waste product is also considered a hazardous waste if it is listed in:
      1. Appendix X, Chapter 11, Division 4.5 of Title 22, California Code of Regulations.
   F. Medical waste

Hazardous wastes include but are not limited to:
A. Contaminated Soils
B. Used Motor Oil
C. Waste Antifreeze
D. Used Oil Filters
E. Other used petroleum products (hydraulic fluid, brake fluid, power steering fluid, etc.)
Vehicle & Equipment Leaks

• Cleanup spills and repair leaks immediately
• Ensure that vehicles and equipment are maintained in good working order
• Inspect vehicle and equipment maintenance areas regularly
Example of Illicit Discharge

• Document all pertinent information and
• Report immediately
Example of Illicit Discharge & Illegal Connection
Example

- Do NOT Touch Drums / Containers
- Follow Proper Procedures
Example of Chemical Spill
Example
Example
Example
Example
Example
Example
Example
Example
Example
Example
Example
Example
Example
Example
REVIEW
Questions, Answers, and Discussion