

## ***Illicit Discharge Detection and Elimination***

### ***Additional Activities Implemented***

The City implemented additional activities to reduce and eliminate illicit discharges this reporting period.

- Storm Water Staff began issuing Notice of Violations in March 2008 to the responsible party for illicit discharges to the storm drain system. A table of the types and numbers of the Notice of Violations is shown under ID-4C. Examples of Notice of Violations are in Appendix C.
- The City began conducting pretreatment inspections at food facilities in June 2008 for Fats, Oils, and Grease (FOG) and storm water issues. An inspection form is used which includes violations for both FOG handling and storm water discharges. The FOG program requires all food facilities to install grease interceptors in order to reduce the amount of grease accumulating in the City's collection system and sanitary sewer overflows as a result of the grease blockages. See Appendix C for an example of an inspection report.

A brochure was created for food facilities "FOG, Storm Water and Your Restaurant!" which lists BMPs for both grease handling and Storm Water. See Appendix A for a copy of this brochure.

- The City contracts with Paso Robles Waste Disposal to provide curbside pick up of used oil for residents. This service is listed on the City's web site at:  
<http://www.prcity.com/government/departments/publicworks/trash-recycling/faq.asp#oil>

### ***BMP ID-1: Enforcement Authorities***

#### ***i. General Summary***

The city encourages the public to report illegal discharges, spills, and runoff from construction sites by providing a separate storm water information phone line and a form on the storm water web page to anonymously report incidents.

#### ***ii. Status of Measurable Goals***

ID-1A: *The City will develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges.*

A reporting form for the public to report illicit discharges was designed in Year 1 and is available on the city's storm water web page. Only 1 citizen complaint was received during the past Year off of the web site. City employees have been directed to notify the City Storm Water Inspector directly by phone or e-mail so the response to the complaint is not delayed.

Three illicit discharges were reported by City staff, one resulted in a notice of violation being issued for discharge of pressure washing into the storm water system, while the

other two incidents were minor and resulted in a warnings only. The City expects that the public will begin to use the designated storm water information line to report illicit discharges as this number is advertised on new brochures and on the web site.

ID-1B: *The City's Engineering Standard Details and Specifications will be revised in Year 3 to address the Design Standards included within Attachment 4 of the General Permit.*

In May, the City hired a consultant to review the Engineering Standard Details and Specifications, for compliance with Attachment 4 criteria. The City will be updating and revising this document in conjunction with the development and adoption of the Low Impact Development Design Manual.

**iii. Appropriateness**

ID-1A: The reporting form developed in Year 1 is intended to provide the general public with an additional method of reporting illicit discharges.

ID-1B: Including Attachment 4 requirements in the Engineering Standard Details and Specifications will ensure that the City projects or private projects in the City right-of-way will be compliant with the General Permit.

**iv. Effectiveness**

ID-1A: Recording the number of incidents reported using the reporting form is consistent with CASQA level 1: Documenting storm water program activities.

ID-1B: Revising the Standard Details and Specifications is consistent with CASQA level 4: Reducing Loads from Sources, because attachment 4 provides specific source control design criteria for projects on the City property or private projects within the City right-of-way or (as defined in Attachment 4).

**v. Proposed Modifications**

The City would like to consolidate similar BMPs into one BMP. The City would like to change the title of this BMP from Enforcement Authority to IDDE Complaint Investigation and Response. This BMP would have ID-1A (Developing forms or format to receive complaints) and ID-2 (complaints from the Fire and Police Departments) and ID-4C (responding to complaints within 24 hours included). The complaint form on the web site for the public would remain, however, the complaint form for the Police (Code Enforcement) and Fire Departments and staff is not the best method for reporting illicit discharges or spills. Since the City has a designated storm water inspector, having reports made by phone or e-mail instead of a form and keeping a log of these complaints would allow staff to respond quicker and possibly eliminate the illicit discharge.

BMP ID-1B and ID-7 are redundant. Both of these BMPs involve revising City's Engineering Standard Details and Specifications. Both of these BMPs discuss reviewing the Engineering Standard Details and making revisions to them to address non-storm water discharges and illicit discharges. The City would like to have just one BMP for revising the Engineering Standard Details and Specifications under BMP ID-7.

vi. ***Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.***

The City will continue to track the number of complaints of illicit discharges or spills received from the public and staff. The City will revise the City Engineering Standard Details and Specifications to incorporate Attachment 4 criteria and any other necessary revisions required for the adoption of a Low Impact Development Design Manual.

***BMP ID-2: Hazardous Materials and Waste Management***

i. ***General Summary***

Develop and distribute hazardous materials and waste management incident forms to City Department of Emergency Services, the Fire Department, Integrated Waste Management Authority and Paso Robles Waste disposal.

ii. ***Status of Measurable Goals***

ID-2: *The City will develop forms or a format for reporting incidents involving hazardous waste, liquid waste, spills, etc. that could pollute storm water.*

Forms were developed in Year 2 as required. The City's Fire Department did not have any incidents that reached a storm drain or water way.

City Code Enforcement, which is part of the Police Department, referred two complaints to storm water staff during this reporting period.

- A complaint of an overflowing private sewer lateral. It was determined that the sewage was contained on the private property and did not reach the storm drain system. The owner of the property was sent Notice of Violation to clear the blocked lateral and keep it in good operating condition.
- Code Enforcement responded to an illegal discharge of water and latex paint to the storm drain. The responsible party was directed to clean up the gutters and educated on the proper disposal of paint waste and clean-up water.

iii. ***Appropriateness***

Storm Water staff have found the using forms to report illegal discharges to the storm drain system delays response time to complaints. Additionally, Paso Robles Waste Disposal and Integrated Waste Management Authority do not normally act in a capacity as reporting entities for storm water violations.

iv. ***Effectiveness***

Tracking the number of illegal discharges that the Fire Department and Code Enforcement reports is consistent with CASQA level 1: Documenting Activities.

v. ***Proposed Modifications***

As stated above, this BMP is a complaint related BMP which would be a better fit under ID-1 which was proposed to be changed to include all illicit discharge complaint actions related to developing complaint forms, procedures and response.

This particular BMP would be reworded to include the Fire Department and Police Department and would report discharges to the storm drain system. Integrated Waste Management Authority (IWMA) and Paso Robles Waste Disposal would be removed since neither of these organizations normally work in the capacity of making complaints. Therefore, this BMP would focus on tracking complaints from the City's Police (Code Enforcement) and Fire Departments. This BMP would track all complaints, not just those received on the complaint form. A log would be kept of all complaints.

**vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.**

The City will continue to track complaints received from Code Enforcement and the Fire Department.

**BMP ID-3: Storm Drain Mapping**

**i. General Summary**

The development of a map of the storm drain system will aid the City in tracing illicit discharges and non-storm water flows.

**ii. Status of Measurable Goals**

ID-3: The storm drain mapping effort will begin in Year 1 and will be completed by Year 4.

The City created a storm water map identifying drain inlets, outfalls, and storm drain pipes in January 2005. Storm water staff has determined that this map is not 100% accurate. To ensure that the storm drain system map is accurate, the Storm Water Inspector walked the Salinas River and all the tributaries, including man-made channels, in the City limits to identify all outfalls. A total of 188 outfalls were identified and inspected. (71 more outfalls than reported last Year.) Each outfall was photographed and its location identified using Global Positioning System (GPS). The locations of 797 drain inlets were also confirmed using an existing Geographic Information System (GIS) program and field checks for accuracy.

This information will be downloaded onto a map by the City's GPS Analyst. City employees will be able to view the pictures of the outfalls by clicking on an outfall. This map will be made into a storm water system atlas to be used by field staff.

**iii. Appropriateness**

Storm water mapping is a crucial tool for tracing illicit discharges or spills in the storm drain system back to the source, preventing discharges from reaching a waterway, and determining sources of pollution at outfalls.

**iv. Effectiveness**

An accurate storm drain map can be an effective tool for tracing illicit discharges and for preventing discharges from reaching the waterways. Therefore, this BMP has the potential to reduce impacts to receiving water and it is consistent with CASQA Level One: Documenting Activities and when used for preventing an illicit discharge from

reaching a waterway is consistent with CASQA Level 4: Reducing Loads from Sources.

**v. *Proposed Modifications***

No modifications are proposed.

**vi. *Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.***

The 2005 storm drain atlas does not include all of the storm drain manholes and direction of flow. The storm drain manholes in the missing areas will be mapped using GPS and direction of flow of the drains will be added this coming year.

***BMP ID-4: Identification and Elimination of Illicit Discharges***

**i. *General Summary***

Identifying and inspecting targeted outfalls and upstream culverts and drain inlets and helps the City to determine sources of storm water pollution and non-storm water discharges.

**ii. *Status of Measurable Goals***

*ID-4A: Inspect targeted outfalls within the City on a routine basis of twice per year with follow-up inspections as appropriate to ensure abatement of violations.*

The previous annual report listed 61 targeted outfalls. The targeted outfalls on the list had not been inspected prior to March 2008, when the current Storm Water staff were assigned to the program. At that time, the list of targeted outfalls was reviewed and it was determined that some of the listed outfalls were actually storm water conveyances under roads.

It was decided by staff as part of the storm drain mapping and inspection effort, that a new list of targeted outfalls would be made. Staff did not feel that all of the outfalls previously listed on the previous list were of a concern. The new list contains 20 targeted outfalls. See Table 9 below.

Although the targeted outfalls did not get inspected twice, the storm water staff inspected all 188 outfalls located in the City and completed an outfall inspection form for each one. A list of outfalls which need some type of work such as tree or debris removal has been made. This list will be discussed with the Streets Supervisor who will determine the work to be done on the outfalls. See Appendix C for examples of outfall inspection forms.

The inspections did not identify any illicit discharges from City outfalls. However, three illicit discharges were found that were not actually in City outfalls.

- A discharge of plaster that had been washed out of a mixer onto the bank of the Salinas River from a stucco business. A Notice of Violation was issued to the owner. The owner cleaned up the dried stucco.

- A discharge from auto detailing at an auto body shop into the Salinas River. The owner was contacted and instructed to cease the discharge. He was instructed to install a clarifier and connect to the sanitary sewer. The owner complied and completed the work under a building permit.
- A discharge of slurry from a company that polishes granite was found in a man-made channel. The company owner was instructed to cease the discharge. The owner immediately changed the company's procedure and cleaned up the slurry in the channel.

***Table 9. Targeted Outfalls***

<b>Outfall #</b>	<b>Location</b>	<b>Reason</b>
1	East of Highway 101, North of treatment plant	Significant Flow
3	Highway 46 East and Highway 101	Significant Flow
12	13th Street and Paso Robles St	Significant Flow
13	11th and Garden St	Sulfur Discharge
38	Niblick and Salinas River	Significant Flow
29	Highway 46 West and Ramada	Significant Flow
49	North River Rd and Union	Significant Flow
44	South River Rd and Salinas River	Significant Flow
124	Niblick Rd and South River Rd	Significant Flow
140	Rambouillet and Moody Ct	Significant Flow
118	Rambouillet and Stoney Crk	Significant Flow
17	North Highway 101 and Niblick Rd	Significant Flow
34	River Bank and Bridgegate	Significant Flow
56	North River Rd and River Oaks Rd	Significant Flow
83	Oxen and Brahma	Significant Flow
106	Cedarwood and Ebony	Significant Flow
107	Cedarwood and Teak	Significant Flow
108	Cedarwood and Beechwood	Significant Flow
64	4th Street and Peachtree	Significant Flow

**ID-4B:** *Identify culverts and/or drain inlets upstream of targeted outfalls which appear to be a potential source for discharging pollutants. (Year 4)*

The inspection of the outfalls did not show any illicit discharges or spills. The outfalls on the targeted list are considered high risk due to their proximity to the Salinas River or because of the amount of flow.

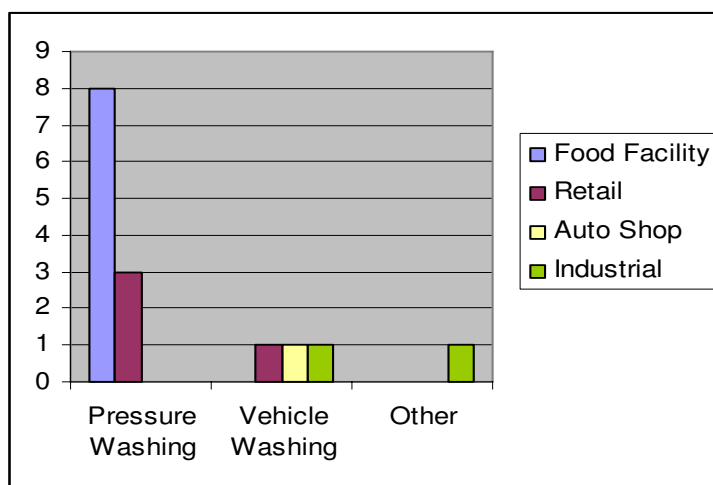
**ID-4C:** *Respond to illicit/illegal discharge within 24 hours of receiving the complaint, referral or notice. (Year 2)*

Storm water staff responded to all complaints and referrals with 24 hours of receiving

the complaint during normal working hours. If an actual illicit/illegal discharge to the storm drain system has taken place, the responsible party is issued a Notice of Violation on site. If the responsible party continues the practice, a second NOV is issued in the form of a letter.

Staff received 3 complaints from March 12, 2008 until June 30, 2008. 15 Notice of Violations and 1 letter were issued during this time. The Storm Water Inspector discovered the other violations while driving through the downtown area. Table 10 below shows the number and types of violations issued.

**Table 10 Types of Notice of Violations**



**iii. Appropriateness**

Inspecting culverts and drain inlets upstream of outfalls with signs of illicit discharges can help determine the source of the discharges. Responding to complaints in a timely manner can reduce the impact on the storm water system or prevent pollutants from entering the waterways as well as educating the responsible party about storm water pollution.

**iv. Effectiveness**

ID-4A: Inspections of targeted outfalls are currently at CAQA Level 1: Documenting Activities

ID-4C: Responding to complaints of illicit discharges, educating the responsible party and issuing Notice of Violations is consistent with CASQA Level 2: Raising Awareness and CASQA Level 3 Changing Behaviors. The City feels that Level 3 is accurate since a local pressure washer purchased recycling equipment after receiving a Notice of Violation in order to be able to work in the City of Paso Robles.

**v. Proposed Modifications**

BMP ID-4C, responding to complaints within 24 hours, would be moved under ID-1 which will be changed from Enforcement Authority to IDDE Complaint Investigation and Response. ID 1 would also have ID-1A (Developing forms or format to receive

complaints) and ID-2 (complaints from the Fire and Police Departments) included. ID-4 would be focused on targeted outfalls and investigating sources of pollution upstream.

**vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.**

The City will inspect all target outfalls twice during the next reporting year.

**BMP ID-5: Education and Outreach**

**i. General Summary**

Illicit discharges often occur because of a lack of awareness. Brochures can educate homeowners and businesses about illicit discharges, the impacts to the discharges to the storm water system and suggestions/best management practices that can be used to eliminate the illegal discharge.

**ii. Status of Measurable Goals**

ID-5: The City will develop an illegal Dumping and Illicit Connections brochure in Year 2.

The City developed a brochure in Year 2 as required. Four additional brochures for specific types of illicit discharges were developed this reporting period which exceeds the measurable goal for this BMP.

- “Help Stop Storm Water Pollution!” was developed in April 2008. Approximately 15 of these brochures have been distributed with Notice of Violations. The brochure is available on the City’s storm water web page and will be handed out at future public events.
- “Best Management Practices for Power Washing” was developed in April 2008. 10 of these brochures were distributed with Notice of Violations. This brochure is available on the City’s storm water web page.
- “Preventing Storm water Pollution at your Business!” This brochure was mailed to 1,244 businesses on June 20, 2008 as required under PE-3C. This brochure covered various subjects such as pressure washing, washing off outside areas and general BMPs for preventing storm water pollution. This brochure is also available on the City’s storm water web page.
- “FOG, Storm Water, and Your Restaurant!” was developed in April 2008 for food establishments. The City began an inspection program for Fats, Oils, and Grease (FOG) in June 2008. This brochure was handed out at ten FOG inspections.

The City provides the brochure which is pertinent to the violation along with the Notice of Violation for illicit discharges. See Appendix A for copies of the brochures.

**iii. Appropriateness**

Creating and distributing informative brochures for homeowners and businesses about illicit discharges and water quality is effective. Distributing brochures with NOVs gives the responsible party alternative methods of performing the task without discharging to the storm drain system or waterway.

**iv. Effectiveness**

The City is currently at CASQA Level 2: Raising Awareness by handing out the brochures with Notice of Violations.

**v. Proposed Modifications**

No modifications are proposed.

**vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.**

The City will continue to create brochures for specific topics as the need arises.

**BMP ID-6: Discharge Ordinance**

**i. General Summary**

A Discharge Ordinance will clearly define the City's prohibitions on non-storm water discharges and storm water pollution.

**ii. Status of Measurable Goals**

ID-6: *The new ordinance will be drafted in Year 2 and finalized in Year 3. Existing ordinances and Standard Details and Specifications will be reviewed and revised as necessary to address non-storm water discharges.*

The Discharge Ordinance was not adopted by City Council in Year 3 as planned. Adopting the Discharge, Post Construction and Grading Ordinances, as well as the LID Design Manual will be a priority in Year 4. The three draft ordinances will be reviewed for consistency with each other.

The City does have a Municipal Code Section that prohibits illegal discharges to waterways and is currently using this section in Title 14 of the City's Municipal Code to issue Notice of Violations for illegal discharges to the storm drain system. Section 14.08.020(B) states "It is unlawful to discharge to any stream or watercourse any sewage, industrial wastes or other polluted waters, except where suitable treatment has been provided in accordance with provisions of this or other applicable agency codes."

**iii. Appropriateness**

A discharge ordinance will better define the City's storm water prohibitions and enforcement authority.

**iv. Effectiveness**

The City is currently at CASQA Level 1: Documenting if a discharge ordinance has been written.

**v. Proposed Modifications**

No modifications are proposed.

**vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.**

The City will review the draft ordinance for consistency with the draft Post Construction and Grading Ordinances, submit it to the City Attorney for review and go through the public review process for adoption by the City Council.

**BMP ID-7: Illicit Discharge Comprehensive Ordinance Review**

**i. General Summary**

Review the Illicit Discharge Ordinance in relation to other City Ordinances to ensure that there is consistency.

**ii. Status of Measurable Goals**

ID-7: *The City will conduct a review of existing ordinances in Year 3 and the Engineering Standard Details and Specifications to determine if any revisions are necessary to specifically address non-storm water discharges and illicit discharges.*

The current Grading Ordinance will be revised in Year 4 and will address non-storm water discharges and illicit discharges when applicable. The Sewer Ordinance is also in the process of being revised. A water quality section will be added to the Engineering Standard Details and Specifications to address non-storm water discharges and illicit discharges on City projects or private projects on City right-of-way.

**iii. Appropriateness**

To provide clear, consistent direction, the new discharge ordinance must be consistent with all municipal codes.

**iv. Effectiveness**

The BMP meets CASQA Level 1: Documenting Activities.

**v. Proposed Modifications**

No modifications are proposed.

**vi. Briefly summarize the storm water activities you plan to undertake during the next reporting cycle.**

The Engineering Standard Details and Specifications, Grading Ordinance and the Sewer Ordinance have been reviewed and will be revised.

**Table 11 Illicit Discharge Detection and Elimination**

<b>BMP</b>		<b>Description</b>	<b>Measurable Goal</b>	<b>Status</b>						
				<b>Implemented</b>	<b>On Schedule</b>	<b>Exceeded</b>	<b>Modified</b>	<b>Effective</b>	<b>Not Effective</b>	<b>Unknown</b>
<b>ID1</b>	Enforcement Authorities	ID-1A: Develop forms or a format for reporting public complaints or maintenance personnel actions regarding illicit discharges. (Year 1)		Yes	Yes			X		
		ID-1B: Revise City's Engineering Standard Details and Specifications to incorporate Attachment 4 design standards. (Year 3)		No	No					
<b>ID2</b>	Hazardous Materials and Waste Management	ID-2: Develop incident forms (Year 2) and track the number of IDDE complaints or actions. (Ongoing)		Yes	Yes			X		
<b>ID3</b>	Storm Drain Mapping	ID-3: Develop a storm drain atlas. (Ongoing)		Yes	Yes			X		
<b>ID4</b>	Identification and Elimination of Illicit Discharges	ID-4A: Inspect target outfalls twice annually. (Ongoing)		Yes	No			X		
		ID-4B: Identify source of pollutants of target outfalls. (Year 4)		Yes	Yes					
		ID-4C: Respond to IDDE complaints within 24-hours (Ongoing)		Yes	Yes	X		X		
<b>ID5</b>	Education and Outreach	ID-5: Develop and illegal dumping and illicit connection brochure. (Year 2)		Yes	Yes	X		X		
<b>ID6</b>	Illicit Discharge Ordinance	ID-6: Develop an Illicit Discharge Ordinance. (Year 3)		Yes	No				X	
<b>ID7</b>	Illicit Discharge Comprehensive Ordinance Review	ID-7: Review other existing ordinances for opportunity to reduce Illicit Discharges.		Yes	Yes					X