

Illicit Discharge Detection and Elimination Inspections

Industrial/Commercial Inspection Workshop

San Mateo Countywide Water Pollution Prevention Program
June 1, 2016



Topics Covered for this Session

- Illicit discharge responses to meet permit compliance
- Residential discharges best management practices
- Mobile Businesses best management practices

What is an Illicit Discharge?

- Sewage
- Wash waters
- Pool or fountain discharges



Solid Illicit Discharges



- Sediment
- Runoff from material storage
- Construction-related waste
- Vegetation clippings and other landscape waste
- Pet waste

Food Related Waste

- Grease
- Equipment wash water
- Mat cleaning wash water
- Trash bin cleaning wash water
- Fish processing wastes



Nothing but Rain Down the Drain



- Spills,
- Dumping or
- Improper disposal of materials
 - Illegal dumping
- Anything other than stormwater to the MS4 collection system
 - Vehicle fluid leaks
 - Potable water discharges if not permitted

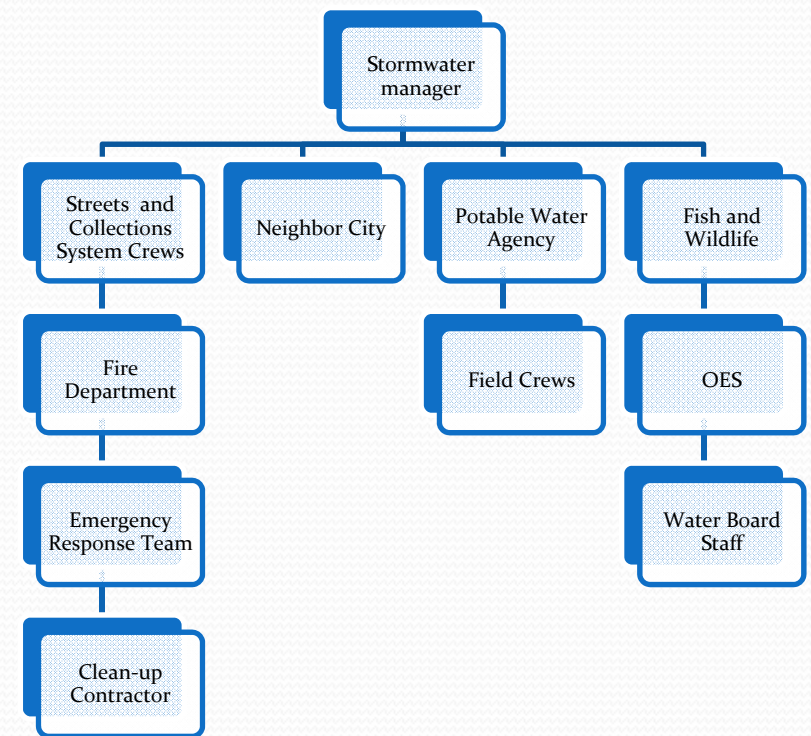
Know Your Enforcement Response Plan & Tools



- Enforcement response plans vary
- Enforcement tools include:
 - Outreach material
 - Verbal response
 - Written response
 - Notice of violation, Notice to comply
 - Referral to another agency
- When and how to apply enforcement

Know Your Contacts and Referrals

- Spill or Illegal Dumping Clean-up
- Hazardous Materials Emergency Response Team
- Office of Emergency Services
- Regulatory Staff
- Potable Water Agency
- Non-English Speaker assistance



Ready for Field Inspections with:



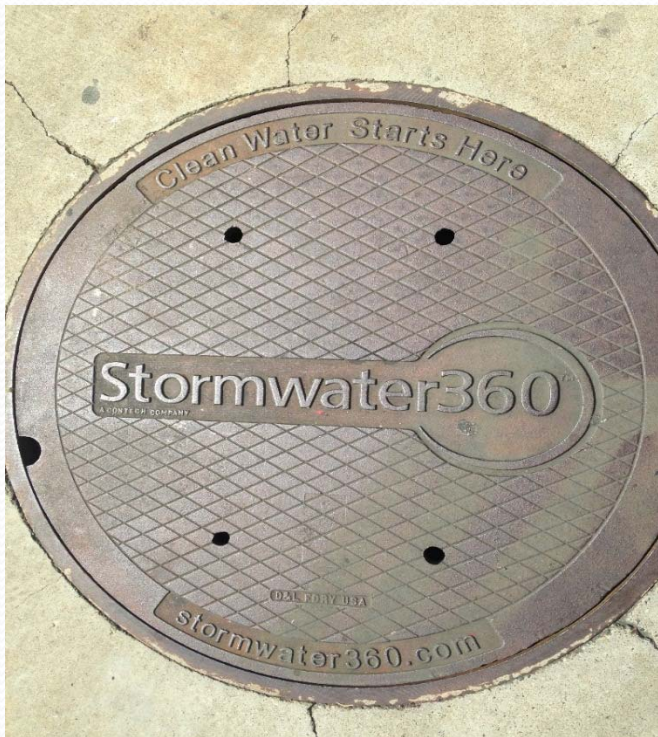
- Personal Protective Equipment
 - Reflective vests
 - Work gloves
 - Safety work boots
 - Safety glasses
 - Hardhat
 - Disposable gloves
 - Sanitizer
- Traffic cones and signs
- Vehicle (with flashing lights)
- Pull hooks/tools and sledge hammer
- Flashlight
- Phone lists
- Inspection forms
- BMP's and Enforcement Notice

Notified of an Incident

- Referral type (phone, in person, email, online form)
- Description of complaint
- Location, date, and time
- Date/Time of complaint
- Active or inactive/potential
- Did it enter storm drain or creek
- Responsible party
- Caller's contact information

IDDE COMPLAINT FORM		CLERICAL USE ONLY	
		File #:	
		Inspector Assigned:	Najwa
ALL HIGHLIGHTED AREAS REQUIRE INFORMATION			
Date Received:	4/25/16	Time Received:	12:05 pm
Received by:	Najwa	Time Inspector Called:	12:05 pm
COMPLAINING PARTY (CP) INFORMATION: <input type="radio"/> caller requested to remain anonymous <input checked="" type="radio"/> caller requested follow-up <small>(THE ABOVE RESULTS WILL ONLY BE PROVIDED IN TOTAL, NO INDIVIDUAL RESULTS WILL BE PROVIDED)</small> <small>WE ARE TRYING TO IMPROVE OUR SERVICE. AFTER THIS CASE HAS BEEN CLOSED, WE WOULD LIKE TO SEND YOU A CUSTOMER SATISFACTION SURVEY CARD ON WHICH YOU MAY INDICATE HOW YOU FEEL ABOUT THE SERVICE YOU RECEIVED. YOUR NAME AND YOUR SURVEY RESPONSES WILL BE KEPT CONFIDENTIAL.</small>			
Name (First and Last): Bobby Joe Address (optional): 123 Apple St. Phone: 555-4255 Email:			
HOW DID YOU HEAR ABOUT US? (Please select one.) <input checked="" type="radio"/> Other: Curb Stamp <input type="radio"/> city operator/directory/411 <input type="radio"/> CP is CSJ employee <input type="radio"/> outside agency <input type="radio"/> have filed complaint before <input type="radio"/> msg. left on vm <input type="radio"/> referral from other CSJ Dept:			
RESPONSIBLE PARTY (RP) INFORMATION (If Available)			
Name: ABC corporation			
Business Name (If Applicable):			
Is it an existing org/facility in EEDMS?			
Org / Facility #:		Phone:	
LOCATION OF VIOLATION: IS IT THE... <input type="radio"/> SAME AS CP INFO <input type="radio"/> SAME AS RP INFO <input type="radio"/> OTHER			
Address # Dir. Street Name (include AVE., DR., EXPY., LN., PKWY., RD., ST.) and Zip Code			
456		Apple St.	
Cross Street: Orange St.		Select one: <input checked="" type="radio"/> Commercial <input type="radio"/> Residential	
DATE AND TIME OF VIOLATION:			
11:00 am 4/25/16			
COMPLAINT DETAIL (WHAT HAPPENED? FLUID IN STREET/GUTTER/STORM DRAIN? APPROX. HOW MUCH?)			
Company staff dumping white liquid into storm drain near Coyote creek			
REPORTED TYPE OF POLLUTANT: (SEE LIST ON REVERSE SIDE) Dumping			
PROBLEM STATUS: <input type="radio"/> Potential Discharge <input checked="" type="radio"/> Actual Discharge			
VEHICLE INFORMATION:			
Lic#	Color	Make	Model
Lic#	Color	Make	Model

Information to Gather for the Field



- Map of storm drain system and receiving water
- Previous incidents at this address
- Property owner or management contact information
- If discharge is hazardous, or don't know
 - Contact hazardous materials agency to respond and make determination
- Field conditions

When You Arrive on Site


- Note location of storm drains and/or adjacent waterways
- Potential or actual discharge
- Abatement measures needed
- Correction actions needed
- Responsible party



Inspection Information Needed

- Complaint information
 - Date & Time
 - Pollutant Type
 - Problem Status
(potential or actual discharge)
- Investigation information
 - Entered storm drain or water body
 - Date and Time abated
 - Enforcement type based on ERP
 - Repeat Problems clear escalated response
 - Interagency and Intra-agency coordination

Retain copies of these completed forms at your municipality's office

 **Illicit Discharge: Source Identification Form**

Inspection Date: _____ Time: _____

Municipality: _____ Department: _____

Inspector(s): _____

I. Source of Discharge	
1. Describe reason for conducting the investigation. <input type="checkbox"/> Conducting regularly scheduled field screening. <input type="checkbox"/> Responding to report from the public, staff, another agency, etc. Date Reported: _____ Time: _____	
2. Describe location of source of discharge (address, cross streets, physical features, etc.) _____ <input type="checkbox"/> Mobile Business <input type="checkbox"/> Business <input type="checkbox"/> Resident <input type="checkbox"/> Other _____	
3. Reporting Contact: _____	Field Contact: _____
4. Phone: _____	Phone: _____
II. Discharge Summary	
1. Illegal Dumping <input type="checkbox"/> Illicit Connection <input type="checkbox"/> Poor Management Practices <input type="checkbox"/> Describe cause of discharge further, if appropriate. _____	
2. Describe frequency of discharge. <input type="checkbox"/> Continuous Discharge <input type="checkbox"/> Intermittent Discharge <input type="checkbox"/> One time incident	3. Volume, if quantifiable: _____ 4. Field Test Results: _____
5. Describe material discharged (Check box and circle subcategory type if needed). <input type="checkbox"/> Construction Materials (debris, concrete, concrete cutting slurry/washwaters) <input type="checkbox"/> Food Wastes <input type="checkbox"/> Industrial Wastes (solvents, metals, corrosive, cooling tower blowdown, etc.) <input type="checkbox"/> Litter and/or Debris <input type="checkbox"/> Paint <input type="checkbox"/> Sediment and/or Silt <input type="checkbox"/> Sewage <input type="checkbox"/> Vehicle Fluids (antifreeze, fuel, oil) <input type="checkbox"/> Washwaters (vehicle, building, sidewalk cleaning) <input type="checkbox"/> Yard Wastes <input type="checkbox"/> Other: _____	
6. Actual/Potential Discharge. <input type="checkbox"/> Discharge entered storm drain and/or receiving water <input type="checkbox"/> Evidence of discharge but did not reach storm drain and/or receiving water <input type="checkbox"/> Nothing found to abate	
III. Follow-up Activities	
1. Describe action to be taken by discharger. <input type="checkbox"/> Discharge has been stopped. <input type="checkbox"/> Discharge cannot be stopped immediately. Describe corrective actions that will be taken by the discharger. _____ Date and Time Discharge Abated: _____	
2. Describe informational, educational, or BMP information distributed. _____	
3. Describe enforcement action. <input type="checkbox"/> None <input type="checkbox"/> Level 1: Informal Violation (including verbal notice) <input type="checkbox"/> Level 2: Written Warning/NOV <input type="checkbox"/> Level 3: Notice to Comply <input type="checkbox"/> Level 4: Legal Action	
4. Comments/Follow-up: _____	

Form 21-0108-01 Sub revision 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[illegible]

- Municipalities need for this year's annual report
 - Number of discharges reported
 - Number reaching storm drains or receiving waters
 - Number discharges resolved in a timely manner

Mobile Business Reporting

Mobile Businesses Enforcement Action Information from SMCWPPP Agencies (updated February 2016)

City Issuing Enforcement	Date of Incident	Business Info				Enforcement Action				Comments				Other Comments	
		Type	Business Name	Field Contact/Owner	Address	Type	Reason	Date Issued	Comments	Address					
				Name	Street	City	Zip Code					Street	City		
Daly City	3/26/2013	Exhaust hood/filter and floor/mat cleaning	HOODZ	Andrew Conti	1357 San Mateo Ave., Suite 1379	South San Francisco	94080	Notice of Violation	illicit discharge	3/26/2013	Had two run-ins with him, made him clean	6893 Mission St.	Daly City	exhaust hood cleanings, exhaust filter cleanings, power washing floors, mats, etc. for restaurants	
San Mateo	3/13/2014	carpet cleaner	Lavos Cleaning Solutions	Luis Lazo				Outreach/ verbal warning	reported from another agency	3/13/2014		2977 S Norfolk #210	San Mateo	He asserted that he does not discharge anywhere but to the apartment complex clean-out, which he showed to inspector.	
South San Francisco	9/28/2013	car washing	FLEETWASH	Ralph Colonna	1162 Bessemer Ave	Manteca	95337	Written warning letter	washing trucks, saw during surveillance	10/4/2014		250 Utah Ave.	South San Francisco	Warning for washing NesTrams trucks at Nippo Express Parking Lot. Identified during regularly scheduled field surveillance.	
South San Francisco	3/6/2012	mobile food truck	Fresh and Natural	Allen Nguyen	P.O. Box 55321	Hayward	94545	Citation delivered (\$100)	discharging grey water to ground adjacent to bay	3/7/2012		195 Bell Aire Rd.	South San Francisco	Near SSF Water Quality Control Plant	
South San Francisco	5/2/2014	wash waters	Master Plumbing	Mike Smith	650 Vaqueros Rd., Bldg G	Mountain View	94043	NOV	letting out catch basins and discharging to storm drain system	5/14/2014		2263 Westborough Blvd.	South San Francisco	NOV for discharging cleanup waters to storm drain system per call received from the public	
San Mateo	3/21/2014	carpet cleaner	Greenet Carpet & Upholstery	Marc Alvarado	1524 Mefford Ave	San Mateo	94401	Written warning letter	discharging wastewater to SDI	7/24/2014	Some visual evidence of debris on SDI	1524 Mefford Ave	San Mateo	Home business - he said he did discharge wastewater to storm drain, was not aware of municipal code and will dispose of properly from now on.	
San Mateo	12/1/2014	Painters	Central Bay Painting	Robert Lee	14272 Doolittle Dr	San Leandro	94577	Notice of Violation	illicit discharge	12/4/2014	Discharge of paint wastewater to catch basin	20 E 20th Ave	San Mateo	Paint and/or wastewater discharged to catch basins beneath PHAR building in San Mateo.	
San Mateo	4/17/2015	carpet cleaner	Ernest Carpet Cleaning	Ernesto Gonzalez				Written Warning/ Outreach	Discharging wastewater to street (into SDI)	4/17/2015	equipment needs repair/ leaks 2-3 gal/min while pump is on	409 S. Fremont St	San Mateo	Second encounter observing non-permitted discharge (didn't realize until after). Apparently same issue with equipment causing leak.	
Foster City	6/29/2015	carpet cleaner	Claudio's Janitorial Services	Claudio Arteaga	claudiojanservices@yahoo.com	San Mateo		None	Add to database		Compliant. Just recording business name.			Lives in East Bay, business out of San Mateo. (877) 290-4640 www.claudiojanitorialservices.com	
San Mateo	8/26/2015	concrete sawcut	Rosas Brothers	Victor (510) 534-1077	PO Box 7862	Oakland	94601	Outreach/ verbal	did not contain concrete slurry	8/27/2015	Returned 8/28 to cleanup dried slurry	4079 Alameda de las Pulgas	San Mateo	slurry ran down street 330 feet, but did not enter SDI	
Belmont	10/16/2015	carpet cleaner	Brile Carpet Care	408-314-1253	PO Box 36023	San Jose	95158	None	Discharging wastewater to street (into SDI)	10/16/2015	Compliant. Just recording business name.			drained dirty water to street, entering catch basin at end of the street	
San Mateo	7/18/2015	Mobile Grooming	Alpha Grooming Pet Salon	Carlos Chaves (650) 271 4282	1325 Howard Ave	Burlingame	94010	Notice of Violation	Wastewater discharge to SDI	7/20/2015				Picture from discharge on file	

- 2017 report (Starts July 2016)
 - Report enforcement and inspections
 - Intra/inter agency coordination of mobile businesses encouraged
 - Minimum standards for various mobile businesses

Residential Discharges



- Sewage
- Leaky vehicles
- Remodeling wastes
- Sediment
- Vegetation clippings & other landscape waste
- Pool and fountains
- Pet waste

Sewage Spill Overflows SSOs

Stop!!

Pouring cooking oil or grease into your sink is prohibited!

DON'T

Don't pour cooking oil, grease or greasy food down the drain.

Don't use hot water and soap to wash grease down the drain! It will cool and harden in the sewer line.

DO

Pour cooled grease into disposable containers or directly into the garbage if it has hardened.

Use a paper towel to wipe away any residual grease or oil on dishes, pots or pans before washing them.


Grease

Was Removed From Sewer Lines
In Your Area!

Prevent Sewer Overflows

Keep Fats, Cooking Oil & Grease out of your drains. Over time, grease buildup can clog the entire sewer line.

For more information
Call
(650)522-7300



- Aging lateral (private sewage lines)
 - Property owner responsible
 - Agencies may have assistance
 - Health department referral may assist in enforcement
- Grease blockages
 - Best practice grease to trash
 - Door Hangers
- RVs discharge to storm drain
 - RV disposal sites

Vehicle Fluid Leaks

- Leaking vehicle
 - Drip pan underneath
 - Repair vehicle
- Difficult to resolve
 - Neighbor disputes
 - Hard to find vehicle owner
 - Work with code enforcement



Pools and Spas

- Prevent copper or chlorine from entering storm drains
- Check with local wastewater authority for discharge requirements
- Place drip pans or buckets under drain pipe/hose connections to catch leaks
- Filter wash must be absorbed by landscape
- Clean-up spills with dry methods
- Properly dispose of unwanted pool care products and spills clean-up materials



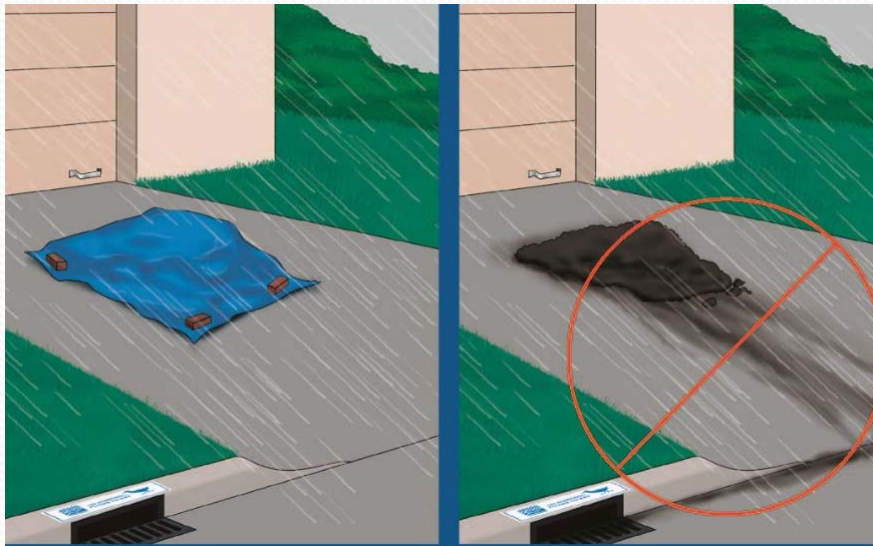
Remodel Activity



- Sweep up dust and debris
- Store stockpiles and landscaping materials under tarps
- Schedule grading and excavation projects during dry weather
- Divert runoff away from storm drains with check dams or ditches
- Protect storm drains inlets
- Cover exposed soil with vegetation or control blankets

Sediment Migration

- Cover large piles of soil



- Prevent tracking from unvegetated pervious areas
 - Change activity
 - Install gravel or vegetation area between dirt and pavement

Landscaping Activity

- Compost leaves grass clippings and other organic waste
- Practice grass cycling – leaving grass clippings in place
- Chip pruned and tree waste for mulch
- Mulch open areas to reduce soil erosion



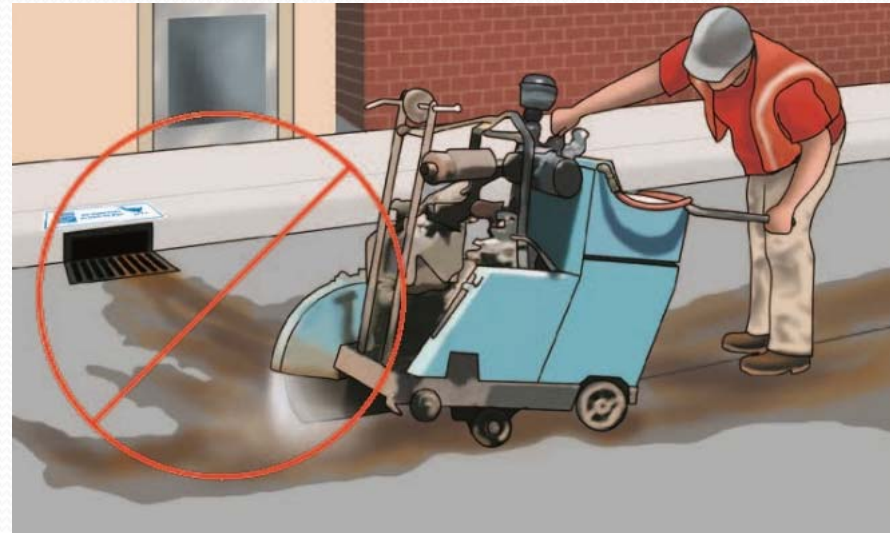
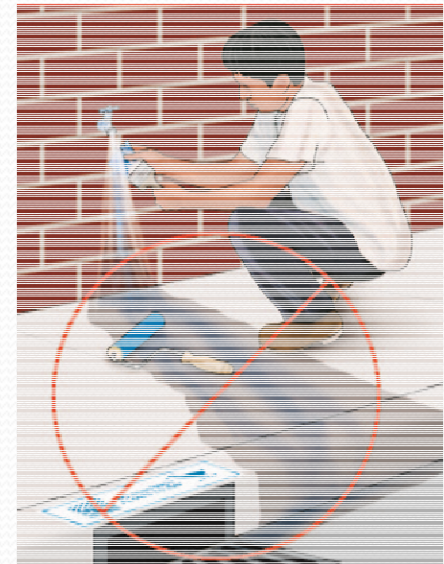
Pet Care

- Pick up pet waste with dry methods and place in trash
- Do not hose pet waste into street gutter or storm drain
- Information on <http://www.flowstobay.org/petwaste>



Mobile Businesses

- Food Trucks
- Carpet Cleaners
- Power Washing
- Fleet Washing
- Storm Drain Inlet Cleaning
- Painters
- Concrete Saw Cutting
- Mobile Groomers



Mobile Business Brochure

- Determine disposal site
 - Use inside drains
 - Prevent from entering drain to sanitary
 - Debris
 - Low pH wastewater
 - Flammable or hazardous materials
 - Material that may clog
- Adequate hoses or tank volume for proper disposal
- No overflow from landscaping or gravel, wash water must soak in before leaving

*Best Management Practices
for*

MOBILE BUSINESSES

Carpet Cleaners
Vehicle Washers or Detailers
Power Washers
Pet Care Services
Steam Cleaners



Information about using Best Management Practices (BMPs) to prevent wash and rinse waters from entering storm drain systems and polluting local waterways, our Bay, and our Ocean.

General Mobile Business BMP's

Doing the Job Right Checklist of BMPs

- ☐ Walk the area to identify storm drains.
- ☐ Sweep the wash area to remove debris.



- Identify and protect storm drains
 - Contain wash area
 - Block or seal off storm drains
- Sweep area to remove debris
- Minimize water use
- Wash without soap or use less toxic cleaning products
- Remove sediment accumulated during washing

Carpet Cleaning



- Discharge of wash water to street
 - Flow entering storm drain inlet (SDI)
 - Equipment leaking
 - Evidence of debris in storm drain
- Specific Best Management Practices
 - Use “Dry Cleanup” methods first
 - Acquire a wastewater permit for discharge to sanitary sewer



Parking Lot and Power Washing

- Specific Best Management Practices
 - Use absorbents to pick up spills and sweep-up before washing
 - Seal storm drains with plugs or rubber mats
 - Test if hot water alone works to avoid soap
 - Vacuum up wash water immediately
 - Set up collection spot to pump wash water to proper disposal
 - Keep wash water away from street, gutters and storm drains with vacuum booms, containment pads or temporary berms



Fleet Washing

- Contractor washing trucks
- Specific best management practice
 - Designated truck washing area
 - Set up collection spot to pump wash water to proper disposal

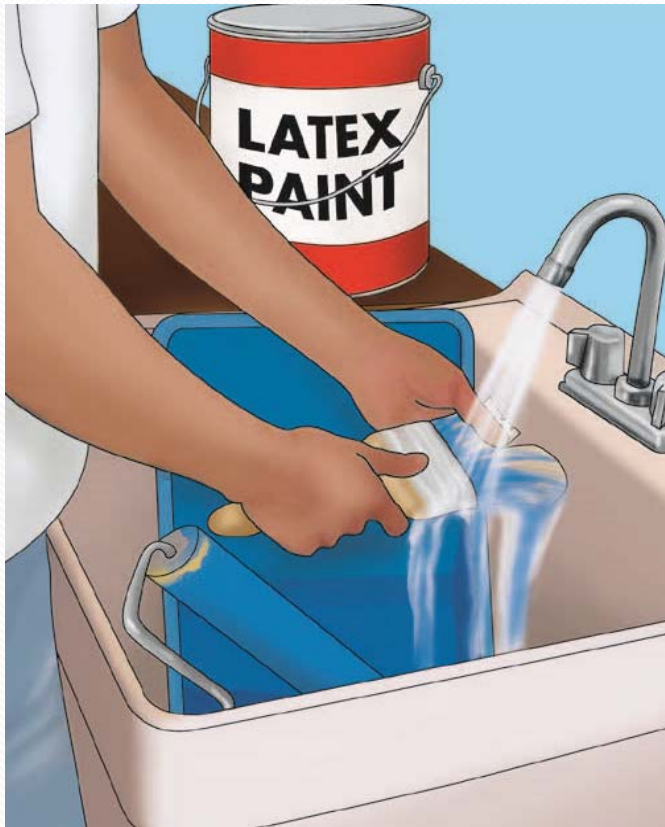


Private Stormdrain Maintenance



- Jetting out catch basins
- Discharged to storm drain system
- Specific best management practices
 - Remove debris mechanically
 - Plug outlet line of catch basin
 - Collect jet discharge by vacuor or pump
 - Dispose of wash water properly

Painting



- Sweep up first
- Direct high pressure wash water to sanitary sewer or landscape capable of containing the washwater
- Disposed of liquid paint residues at hazardous waste collection facility
- Disposed of oil paint saturated brushes, rags and drop clothes at hazardous waste collection facility

Concrete Saw Cutting

- Evidence of discharge dried slurry
- Current discharge may or may not contain concrete slurry
- Specific best management practices
 - Block the storm drain and vacuum as applying
 - Wash tools in a dirt or landscaped area
 - After equipment is dry, dispose any hardened concrete in the garbage



Mobile Grooming

- Designated wash water disposal at home base
- If discharge to landscaping, water must completely soak into vegetation before mobile business leaves the site



Food Preparation

- Vacuum or shake floor mats into trash can
- Wash mats in dishwasher or inside utility sink
- Send filters and small equipment through dishwasher
- Train employees to collect and send wash water to sanitary



Outreach Materials

- Countywide materials such as Mobile Business General BMP's, food facilities, automotive, mobile cleaner and power washer
<http://flowstobay.org>
- BASMAA Surface Cleaning BMPs: sidewalks, plazas, exteriors, parking areas, etc.
<http://basmaa.org>
- Maintenance Tips for Pools Spas and Fountains
<http://www.ourwaterourworld.org>





Conclusions

- The goal is to educate the public, stop illegal discharges, and achieve environmental compliance
- Illicit discharges are spills, dumping or improper disposal of materials other than stormwater to the collection system
- Know your ERP and contacts
- Abate all actual discharges immediately
- Submit mobile business enforcement action to SMCWPPPP program staff
- Have outreach materials with BMPs ready
- Remember, always be safe!