



MEETING AGENDA

KELSO STORMWATER ADVISORY COMMITTEE

DATE: Sept. 28, 2011
TIME: 4:00 pm – 5:00 pm
LOCATION: Kelso City Hall, Suite 203

New Business

- 1) Illicit discharge program
- 2) Education interlocal agreement



Kelso Stormwater Advisory Committee Meeting
September 28, 2011 @ 4:00 p.m.
City Hall Conference Room 203
203 S. Pacific Ave.

Attendees:

1.

Michelle Duggan

2.

Stephanie Taylor

3.

Gloria Nichols

4.

Vannessa

5.

DAN Howell

6.

Joy Frederic

7.

8.

9.

10.

11.

12.

13.

14.

15.



Engineering Phone 360-423-6590
Fax 360-423-6591
Operations Phone 360-423-5730
Fax 360-423-8196

CITY OF KELSO
Public Works Department
203 S. Pacific Ave., Suite 205
PO Box 819
Kelso, WA 98626

Stormwater Advisory Committee Meeting

June 29, 2011

Call to Order:

Dan Howell called the meeting to order at 4:05 p.m., at City of Kelso City Hall, 203 S. Pacific Ave., Conference Room 203.

Those present were as follows:

Advisory Committee Members:

Gloria Nichols
Steffanie Taylor
Don Lemmons
Michael Dyer
Tim Wines
Dan Howell

Staff:

Van McKay, City of Kelso
Stephanie Helem, City of Kelso

Excused Absence: Gary Fredricks

Approval of Minutes:

Don Lemmons made the motion, seconded by Steffanie Taylor to approve the minutes of March 30, 2011. Motion carried, all in favor.

New Business:

1. 2012 NPDES Permit Draft Language

The new 2012 NPDES permit has language revisions and additions regarding Low Impact Development and Stormwater Monitoring. The Department of Ecology (DOE) has a preliminary draft of the 2012 permit on their website for interested permittees who would like to comment on these changes. In October of this year DOE will compile preliminary draft comments received and issue a formal draft. A formal comment period will be set and after given deadline a final permit will be issued. The current NPDES permit expires February 2012. The new permit will not be written, approved or effective by 2012 expiration date.

Van McKay provided the committee a copy of the "Western Washington Phase II Municipal Stormwater General Permit, Preliminary Draft Language" document. A brief overview of some of the language changes was reviewed and the following items discussed:

- A. Page 2, Item No. 4 – Controlling Runoff from New Development, Redevelopment and Construction Site.
 - i. 1 acre threshold. Impact of change?
 - ii. Plan Review, inspections, maintenance
 - iii. Local vs. State requirements.
 - iv. Several jurisdictions have submitted comments that mirror city comments on the preliminary draft. Committee discussed their interest in submitting comments after further review of the preliminary permit draft.
- B. Page 9, Item g. Watershed – scale stormwater planning.
 - i. Kelso’s cost boundary?
- C. Page 11, Monitoring Preliminary Draft Language
 - i. Two Methods – Traditional vs. Probabilistic
 - ii. More cost effective approach if several jurisdictions combine efforts.
 - iii. Do Kelso industrial permittees have issues with testing? How do Kelso’s numbers compare to other jurisdictions?
 - iv. Clark County has proposed monitoring program for other Southwest Washington jurisdictions to participate in. Their monitoring program would provide monitoring equipment, sampling, testing results, software, data entry, generate reports. Breakdown of costs included in provided document titled, ‘2012 Phase I & II Municipal Stormwater NPDES Permit, Status and Trends Monitoring Proposal for SW Washington’. Discussion followed.
 - 1. Cost for Clark County to take and process sample seems high. Will DOE except City of Kelso as an individual entity sampling and testing? Look at local testing facility and cost savings.
 - v. A Southwest Washington Permittee Group meeting will be held at the end of July to discuss monitoring changes. KSAC members discussed scheduling another meeting to discuss these changes and other alternatives to provide comments to Van McKay prior to this meeting.

2. Other Business Discussed

- A. Illicit Discharge Ordinance has been effective enforcing compliance for property owners violating ordinance.
- B. Education Subgroup Report:

Michael Dyer, Gloria Nichols, Steffanie Taylor, and Van McKay met with Kelso School’s Curriculum Director to discuss possibility of creating an interactive stormwater presentation for local schools. School will determine what grade level presentation will be introduced based on learning objectives and goals submitted to the school.

Goals:

1. Raise awareness of stormwater pollution
2. Improve water quality and surface waters
3. Decrease stormwater quantity

Learning Objectives:

1. Low Impact Development how it increases water quality and decreases stormwater quantity.
2. Differences between point and nonpoint discharges.
3. Learning about effects of stormwater pollution on fish and wildlife.
4. Causes of pollution and human action, how we can decrease pollutants.

Next Meeting:

Committee discussed and agreed the next meeting shall be held July 13, 2011.

Meeting adjourned at 5:13 pm.

Approved:



Dan Howell, Chairperson



Stephanie Helem, Recording Secretary



MUNICIPAL STORMWATER ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

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PURPOSE, GOAL, AND APPROACH

PURPOSE

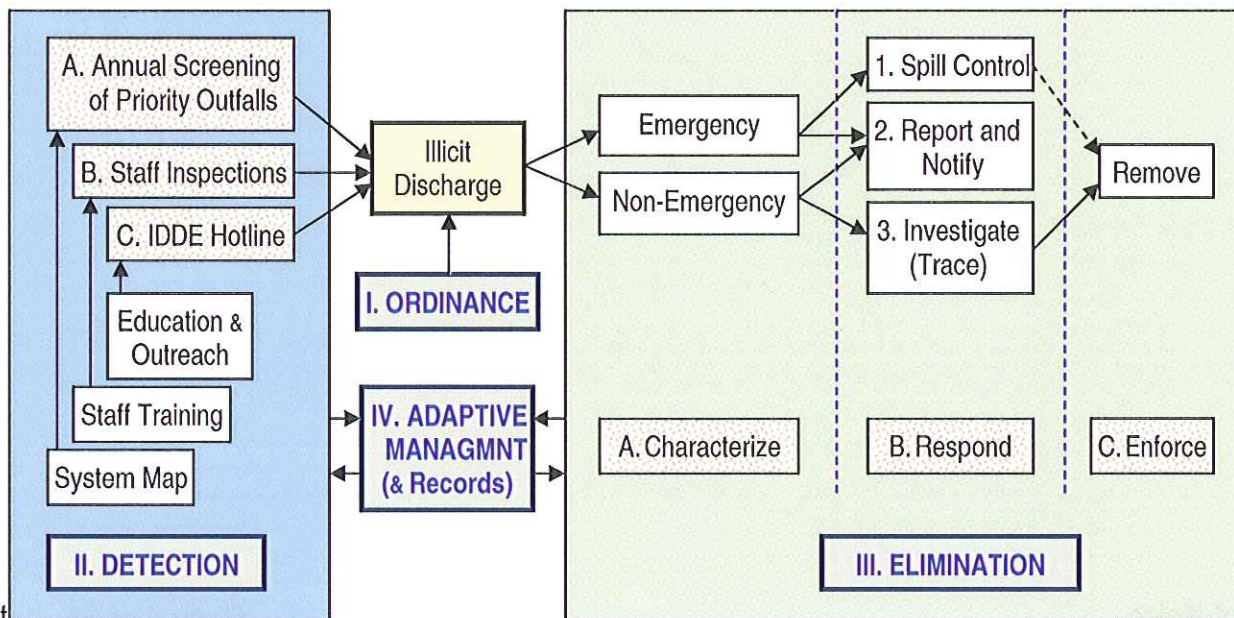
This Municipal Stormwater Illicit Discharge Detection and Elimination (IDDE) program was written to comply with the Phase II Municipal Stormwater NPDES Permit (Permit) for Western Washington; specifically, sections S4.C, S4.D, and S5.C.3. This manual is intended to establish and guide internal policy, procedures, training, scheduling and to document those items that are already in place.

GOAL

Detect and remove illicit connections, illicit discharges and spills into Kelso's stormwater drainage system.

APPROACH

- A. This program is a subcomponent of the City's Stormwater Management Program (SWMP).
- B. It will be reviewed periodically, but no less often than once per permit cycle, by Public Works, and updated as necessary to keep current, capture lessons learned, and to otherwise ensure effectiveness.
- C. It incorporates or relies upon the following:
 - ❖ All requirements of Section S5.C.3 of the Municipal Stormwater NPDES Permit.
 - ❖ Other elements of the SWMP.
 - ❖ Kelso Municipal Code (KMC) 13.09 Stormwater Management and KMC 13.11 Illicit Discharge – Stormwater Utility
 - ❖ Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, Center for Watershed Protection, October 2004 [a.k.a. the CWP IDDE Manual].
 - ❖ Various Ecology publications, including #07-10-089 "Reporting Discharge and Spills under the Municipal Stormwater NPDES Permits" and "IDDE Field Training Guidance Elements Checklist."
- D. The City's IDDE strategy is organized as shown below:



I. ORDINANCE

MS4 NPDES Permit Requirement: S5.C.3.b (Ordinance)
<p>Have an ordinance that prohibits non-stormwater discharges, and . . .</p> <ul style="list-style-type: none"> i. Excludes certain non-stormwater discharges (most groundwater, A/C condensate, emergency firefighting, etc.). ii. Conditionally excludes certain non-stormwater discharges (de-chlorinated potable and pool water, etc.). iii. [the SWMP shall address each category in b.ii]. iv. [the SWMP shall address any category in b.i or ii that are identified to be significant source of water pollution]. v. Include escalating enforcement procedures. vi. [the SWMP shall include an escalating enforcement strategy (i.e. implement that portion of the ordinance)].

Compliance Status

The Kelso City Council adopted Ordinance No. 09-3713, Illicit Discharge – Stormwater Utility, on 8/18/2009, thereby adding to the City's Public Services portion of the municipal code. The ordinance allows the City to prohibit any discharge that it considers to be an illicit discharge and it provides for escalating enforcement.

Task ID	PLANNED ACTIVITIES	Date
IDDE-bR1	Continue enforcing KMC 13.11 with a positive, professional approach.	8/2011
IDDE-bN1	Maintain a copy of Ordinance No. 09-3713 to mark up with potential revisions.	8/2011

II. DETECTION

A. PRIORITY FIELD ASSESMENTS (SCREENING)

1. STORM SEWER SYSTEM MAP

MS4 NPDES Permit Requirement: S5.C.3.a (Storm Sewer System Map)
<p>Maintain a Storm Sewer System map that . . .</p> <ul style="list-style-type: none"> i. Shows the location of outfalls, receiving waters, and structural stormwater BMPs (that are owned/maintained by the City). For outfalls ≥ 24," map shall include the drainage area, land use, and the type, material, and size of tributary conveyances. ii. Shows all connections authorized after February 16, 2007. iii. Shows areas served by the storm sewer system that do not discharge to surface waters. iv. Is provided to Ecology upon request. v. Is provided to secondary permittees upon request.

Compliance Status

Kelso has been using a stormwater drainage system map in a basic GIS system for several years. The City hired a consultant to produce an advanced GIS system that will include a relational database. The City obtained as-built data from the field and the consultant is using the data for mapping, modeling, and development of the georelational database. The new system is expected to be completed by December 31, 2011.

Key GIS layers will include catch basins, manholes, culverts, outfalls, public structural stormwater Best Management Practices (BMPs), drainage sub-basins, and the type, material, and size of conveyances. Other stormwater layers will include roadside ditches, CDID#1, CDID#3, DID#1 conveyances and their pump stations Other layers will include datasets for infrastructure, census, land use, elevation, digital imagery, geographic reference and environment such as soils, rivers and landslides. The GIS system will be updated by the City after repairs and additions to the stormwater system. In addition, supporting datasets will be updated periodically.

Task ID	PLANNED ACTIVITIES	Date
IDDE-aR3	Routine updates of the map (incl. laterals, new infrastructure from annexations, Public Improvement Projects, and in-house work).	Ongoing
IDDE-aN1	Consider adding a layer of private facilities (and check the layer of public facilities)	--

II. DETECTION

C. HOTLINE (PUBLIC EDUCATION AND OUTREACH)

MS4 NPDES Permit Requirement: S5.C.3.d (Public Education & Outreach)
<p>Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste . . .</p> <ul style="list-style-type: none"> i. Distribute appropriate information to target audiences identified pursuant to S5.C.1. ii. List and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Keep a record of calls received and follow-up actions taken in accordance with this Section; include a summary in the annual report (see section S9).

Compliance Status

The Kelso Stormwater Hotline and the Longview-Kelso Stormwater Hotline, 578-0900, were established in the fourth quarter and August of 2008, respectively, and have been continuously operated and listed ever since. IDDE-SOP2, provided in Appendix A, describes its call-out procedures. Reports from the hotline are entered into Kelso's IDDE log. The log is used to track calls and follow-up actions in accordance with S5.C3.d.ii. The Longview-Kelso hotline has been listed in every edition of the area telephone book since 2008, and is publicized periodically in all traditional media formats. In October 2011, letters were sent to all water/sewer bill recipients in Kelso regarding the IDDE ordinance and illicit discharge problems. The City's stormwater website, <http://stormwater.kelso.gov>, has a stormwater incident report form that allows citizens to report online since February 2010

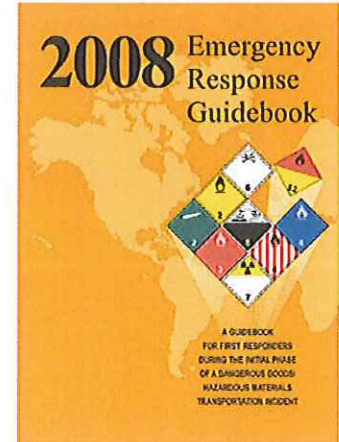
Task ID	PLANNED ACTIVITIES	Date
IDDE-dR1	Continue hotline, IDDE Log, training, and public outreach efforts.	Ongoing

Stormwater Municipal IDDE Program

can be extensive, and often begin with a 40-hour HAZWOPER course and its 8-hour annual refresher (see CFR 1910.120 or WAC 296-843).

In summary, your best response may be to evacuate yourself and others, then call 911 and try to control access to the area until trained professionals arrive.

- The Emergency Response Guidebook (ERG, shown right) was developed by the US DOT and its Canadian and Mexican counterparts for transportation incidents involving a hazardous material. It is designed to help first responders quickly identify the material/hazards and to establish protective zones away from the incident.
- Basic tips:
 - Call for assistance (911).
 - Use the ERG (shown right) to set a safe perimeter.
 - Go upwind of an inhalation hazard.
 - Do not touch or approach the material without the correct Personal Protection Equipment (PPE).
 - Do not touch mouth, nose, or eyes, or ingest anything on-scene until decontamination or unless cleared by the safety officer.
 - Eliminate ignition sources near flammable or explosive risks.
- Stay in communication, preferably with other staff, via a cell.
- PPE should include: Sunscreen (and/or hat), durable clothing (including taller boots), and gloves. Bring a lifejacket and waders (or rubber boots) near watercourses
- Traffic caution! Use vests, any safety lights, cones, and look-outs as necessary.



Access

Do not enter or work on private property without permission. Aside from that general rule, inspection and sampling constraints and allowances are delineated in KMC 13.11.070.

- Even if the City has tacit permission to enter (such as with a permit or application), the City must first notify the owner of intent to enter for inspection and present credentials.
- City may enter without permission or after unsuccessfully locating the owner only to abate an imminent hazard – and even then, a search warrant must still be obtained afterwards.
- The City may require the Owner to conduct or pay for monitoring to ensure compliance.

Citizen Relations

Informing the responsible party of the condition and requirements, then politely suggesting voluntarily compliance is the most cost effective way of dealing with most access and stormwater issues. As a representative of the City, one should actively listen to the citizen and acknowledge any concerns. Other considerations may include being prepared, projecting a high degree of professionalism, giving a proper introduction, clearly communicating (or better, reaching mutually understood agreement on) the problem, expectations, and timelines, assuring confidentiality as applicable, completing any follow-up, and finally, documenting the case. Typically, it is also a good idea to apprise a co-worker of anticipated citizen contacts, should an emergency arise.

IV. ADAPTIVE MANAGEMENT (RECORDKEEPING)

MS4 NPDES Permit Requirement: S5.C.3.e (Program Evaluation & Assessment)

Implement procedures for program evaluation and assessment, including tracking the number and type of illicit discharges, including spills, identified; inspections made; and any feedback received from public education efforts. A summary of this information shall be included in the annual report.

Compliance Status

Since February 2008, the number and type of illicit discharges, including spills; inspections made and any feedback received from public education efforts have been logged into the Kelso IDDE Log (see Appendix D for an example page). A summary is included in the annual report.

This Manual is a working document. It is reviewed and revised periodically to keep it current and accurate. Records are kept in accordance with S9 of the Phase II Municipal Stormwater Permit.

Task ID	PLANNED ACTIVITIES	Date
IDDE-eR1	Continue current efforts.	Ongoing

APPENDIX A

**2010 Priority Receiving Waters Illicit Discharge
Prioritization Spreadsheet**

IDDE-SOP1 – Annual Priority IDDE Field Survey

Prioritization

Planning. Understand Chapter 5 of the CWP IDDE Manual. This is not a time-consuming research effort – rely on common-sense processing of readily available information.

Criteria. Basic criteria includes zoning (note the dominant and secondary zones by area), density of NPDES permittees, EPA’s Enforcement & Compliance History Online (ECHO), EPA’s regulated facilities in Envirofacts, Tier II reports for air quality, Ecology stormwater permits. Optional criteria include:

- Consider basin size,
- IDDE call volume
- Sanitary septic systems
- Age of development, and/or
- Density of target businesses (such as those likely to have floor drains or highly contaminated runoff).

Procedure.

- Work to plot this information on the map (it should also include the storm sewer system and drainage basins).
- Use the map to assign criteria to all receiving water bodies including Coweeman and Cowlitz Rivers and diking district watercourses.

Screening

Safety and Access. Fully adhere to Section II of this manual.

Planning.

- Understand and use the CWP IDDE Manual; specifically, its Outfall Reconnaissance Inventory (ORI) field sheets and its procedures in Sections 11.1, 11.3 – 9, 12.1 – 2, and 12.5.
- Inspect only during dry weather (with no precipitation in runoff in the past 48 hours, typically in the summer).

Equipment List

PPE (refer to Section III of this Manual)

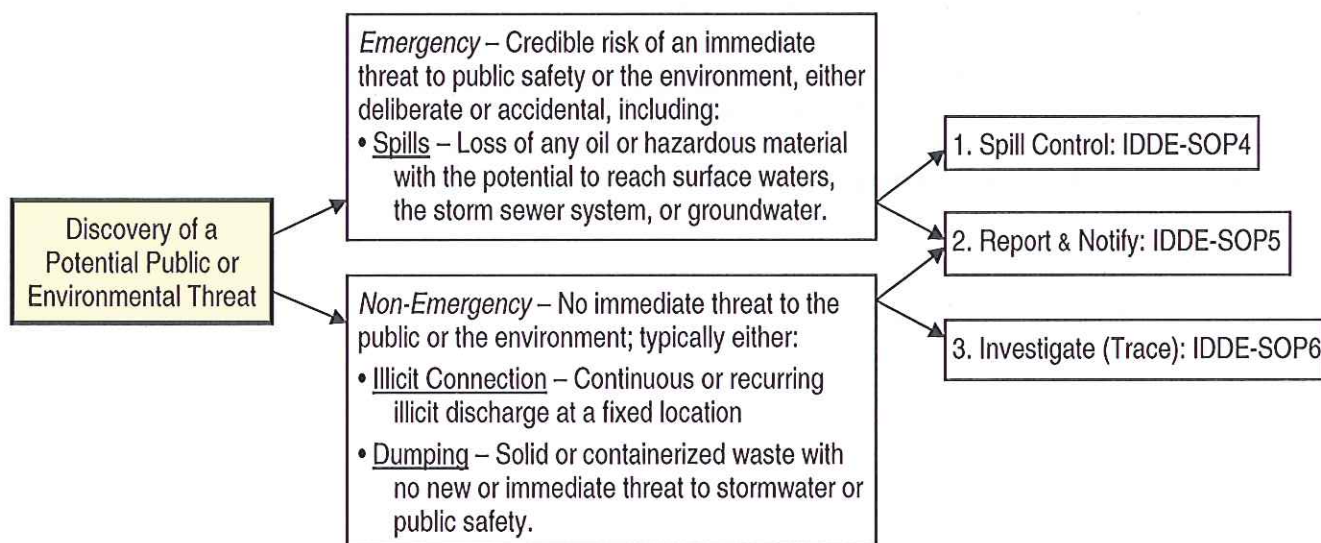
Watch	Digital camera (spare batteries)
City ID	Flashlight (spare batteries)
Machete	Dry erase board and pens
Cell phone	Clip board and pencils
System map	ORI field sheets
Tape Measure	[Sampling & monitoring gear]

Procedure

- Use the Trimble GPS unit to locate each outfall (capture/correct points if necessary).
- Photograph and complete the ORI field sheet for each outfall (consider a dry erase to ID the outfall in the photos)
- If problems are identified (tracers, dry weather flow, etc.), then assess the risk (IDDE SOP-3), flag the outfall, and return to trace at a later date.
- Trace questionable outfalls (see IDDE SOP6).
- Summarize the finding in a report and file all relevant materials (such as by scanning the ORI sheets).

IDDE-SOP3 – Characterization

CHARACTERIZATION OF MATERIALS IS A COMPLICATED ENDEAVOR SUBJECT TO MANY FEDERAL AND STATE REGULATIONS AND WHICH MUST BE COMPLETED BY PROPERLY TRAINED PROFESSIONALS. THIS SOP REPRESENTS A BEST ATTEMPT TO COMPLY WITH THE MUNICIPAL STORMWATER NPDES PERMIT AND PROVIDE BASIC GUIDANCE TO A DIVERSE GROUP OF PUBLIC EMPLOYEES WHO MAY WORK IN THE FIELD.



Considerations

1. Safety and Access: See Section III of this manual.
2. Amount: Is the amount changing; Can you estimate the amount or rate of loss?
3. Source: Can it be stopped? Where is it from? Is it an accident, illicit discharge, or vandalism?
How large is the discharge pipe? Could the City be responsible party (see IDDE-SOP5)?
4. Potential for discharge / Mobility: Where is it going (or is it contained)? How far to the storm sewer, surface water, or groundwater?
5. Frequency: Continuous, intermittent, single event?
6. Hazard Types: Flammable (incl. explosive), corrosive (acidic or basic), reactive (incl. pressure), toxic (including persistent), or unknown.
7. Exposure Pathway: Inhalation, ingestion, absorption, and injection.
8. Other Physical Descriptors: Labels and placards, bill of lading [shipper, transporter, vendor, and/or manufacturer information], phase (gas, liquid, solid), odor, color, turbidity, viscosity, water miscibility, smoking/fuming/boiling/audible, suds, sheen, floatables, or damage/staining of the container or the affected area.

Common Examples

1. Spills: Auto fluids (typically from an accident, hydraulic failures, or poor maintenance)
2. Illicit connection: Sanitary, floor, or process drains to the storm sewer.
3. Dumping: Drums, pails, manure, garbage, yard waste
4. Illicit Discharges: Residential, commercial, industrial

A. Only stormwater is allowed to discharge to municipal storm sewers & receiving waters.

IDDE-SOP4 – Response, Spill Control

SPILL CONTROL OF POTENTIALLY HAZARDOUS MATERIALS IS A COMPLICATED ENDEAVOR SUBJECT TO MANY FEDERAL AND STATE REGULATIONS AND WHICH IS BEST COMPLETED BY TRAINED PROFESSIONALS.

THIS SOP REPRESENTS A BEST ATTEMPT TO COMPLY WITH THE MUNICIPAL STORMWATER NPDES PERMIT AND PROVIDE BASIC GUIDANCE TO A DIVERSE GROUP OF FIRST RESPONDERS.

Response, Clean-up, and Disposal

1. Safety and Access: See Section III of this manual!
2. Equipment/Supplies: Maintain a kit/stock of the following: plenty of absorbent such as Amerizorb, a variety of pads (oil, chemical, acid), some absorbent socks, a couple flexible drain covers, cones, plastic garbage bags, broom & pan, label tags, PPE, etc.
3. Assess: Use IDDE-SOP3 to help determine if immediate controls and/or additional resources (including emergency services and/or a spill contractor) are needed to protect health or environment. If there is no threat, then address the problem at the first opportunity, the next working day.
4. Advise: Keep your supervisor (or safety representative), 911 Dispatch, Ecology, &/or the spill contractor enroute apprised of site conditions.
5. Control: If possible/safe, stop the source and block pathways to receiving waters.
6. Typical Accident: Stop the source and protect storm drains. Absorb the spill with sorbent pads, kitty litter, or Amerizorb. If possible, promptly bag and label material initially recovered from the spill's hotspot (where free liquid puddles or flows were present, as opposed to just drips or a sheen). Re-apply sorbents to the hotspot as necessary. Notify Operations for sand, sweeping, or vactoring. If the situation is stable, then clean-up can occur later during normal working hours.
 - *Safety Note*: Consider placing sand and "Motorcycles Use Extreme Caution" (or equivalent) road signs if, after clean-up, the street remains slippery from weather conditions and any spill residuals.
 - To learn more, get Ecology's *Focus on Small Spill Clean-up Guide, 03-08-005*.
7. Other Incidents:
 - Consult with Ecology's Spill Response Teams.
 - Need to isolate a spill within a Consolidated Diking District #1 (CDID#1) ditch? CDID#1 (423-2493) might stop the pumps.
 - Big spill on I-5 or a State Route? Involve Washington State Department of Transportation's (WSDOTs) SW Region Traffic Management Center (360) 759-1300.
8. Clean-up:
 - *Minor Incidents*: Depending on the identification and concentrations of the waste, most of the waste generated from a small spill incident is compatible with garbage. Debris from the hotspot of typical oil-related clean-ups (hydraulic oil, greases, incidental amounts of diesel, etc.) should be placed in the "Waste Grease" drum at the City Shop – or in a dump truck (parked under-cover) for disposal in the Subtitle D lined landfill in Hillsboro [Contact the stormwater manager for arrangements with this non-RCRA waste].
 - *Hazardous/Dangerous Waste*: Notify the stormwater manager or a supervisor for hazardous materials (e.g. gasoline), or if there is doubt about the nature of the material or

IDDE-SOP5 – Response, Reporting/Notifications

1. Impetus to Report: The Municipal Stormwater NPDES Permit requires City field staff to be trained to identify and report illicit discharges during the regular course of work. State and Federal laws also govern the (often immediate) reporting of spills
2. How to Report:
 - A. *Business Hours*: Van McKay (423-6590)
 - B. *Anytime*: Longview-Kelso Stormwater Hotline (578-0900).
 - C. *Spills with a potential to threaten safety or reach the environment*: Call 911 for hazmat assessment/response and for proper notifications. Report even if there is uncertainty; the Fire Department will help characterize the spill.
 - ❖ Additionally, contact Van McKay 423-6590 **immediately if the City may be the Responsible Party.**
3. Permit Reporting Matrix: [from ECY Publication #07-10-089 (Rev. 09/10)]

Type of Discharge	Permit Section	Who to Notify	Time to Notify	Other Reporting
A spill or discharge into or from the MS4, which could constitute a threat to human health, welfare, or the environment.	G3	Ecology SW Region: 360-407-6300	Immediately, but no later than 24- hours after obtaining the knowledge.	Call CDID#1 & affected jurisdictions
A spill or discharge of <u>oil or hazardous substances</u> into or from the MS4, which presents a threat to human health, welfare, or the environment.	G3	Nat'l Response Center: 800-424-8802 WA Emergency Mngt Division: 800-258-5990, or 800-OILS-911; & Ecology SW Region Office (see above)	Immediately	None
A discharge from my MS4 that is causing or contributing to a known or likely violation of water quality standards.	S4.F	In addition to any immediate notification under G3, as above, the appropriate authorized person shall notify Ecology in writing. (See S4.F.1)	≤30 days of determining that the discharge contributes to a known or likely violation of WQ standards.	Ecology will respond in writing per S4.F.2.
Illicit discharges not otherwise categorized above.	Various	Document in the Municipal Stormwater Permit Annual Report.	Include in your annual report submittal.	None

These thresholds for G3 reporting are subjective. The following considerations shall be used when gauging “a threat to human health, welfare, or the environment:”

- A. Instances which could pose a safety threat to infrastructure or personnel using it, such as volatiles of a nature and/or amount as to render conditions in or adjacent to any section of the storm sewer system potentially flammable, corrosive, toxic, etc.
- B. Instances which restrict the beneficial use of receiving waters such as swimming.
- C. Note: “Oil” includes a wide variety of materials, including plant-based oils. Report oil spills that cause a sheen in receiving waters (www.epa.gov/oem/content/reporting).
- D. Note: Hazmat spills are more complicated (see Ecology guidance #92-119 “Reporting hazardous material spills...”). Ecology’s reporting requirements differ from the EPA’s CERCLA regulations, which rely on reportable quantities.
- E. Note: A spill that causes a threat to the environment or human health includes those that cannot be easily and rapidly contained (e.g. to saturated soils and/or in amounts that could get out of hand).
- F. See IDDE-SOP3 for the definition of an illicit discharge.

IDDE-SOP6 – Response, Investigations (Tracing)

Requirement to Act:

- Illicit discharges of any kind shall be investigated as soon as possible.
- Immediately respond to (or refer) problems and violations determined to be emergencies or otherwise judged to be urgent or severe.
- Begin an investigation of potential illicit discharge (or refer to the appropriate agency, such as Longview or the Cowlitz County Department of Health) within 7 days of a report or information.
- Begin an investigation of a suspected illicit connection within 21 days of a report or discovery.

General Considerations:

- Refer to Section III of this Manual for Safety and Access.
- Understand Chapter 13 of the CWP IDDE Manual.
- Enter the potential illicit discharge into the IDDE log. Use the log to document any findings or necessary follow-up work.

Strategies:

A. Storm Drain Network Investigation.

1. This approach is best to identify constant or frequent illicit discharges.
2. Systematically isolate the area from which the polluted discharge originates by inspecting manholes progressively upstream from the telltale outfall until it (or evidence thereof) is no longer observed – then work downstream from the “clean” manhole or junction to isolate the location where the polluted discharge is entering the storm drain system.
3. Use a system map, a manhole hook, a flashlight, and maybe a water quality meter(s) to look for flow during dry weather, foul odors, colors or stained deposits, oily sheen and floatable materials.
4. When visual inspections are not enough to isolate the source, consider dye testing, TV inspection, and/or smoke testing. Each of these methods are discussed in Section 13.3 of the CWP IDDE Manual and are typically performed in-house by the stormwater or sanitary sewer utilities.

B. Drainage Area Investigation.

1. This approach is particularly useful when the type of activity responsible for the problem can be ascertained (see the table below) or for infrequent discharges (such as intentional dumping).
2. This approach is similar to the screening process described in IDDE-SOP1, but it considers only the sub-basin and pollution sources that are germane to the problem.
3. Identify potential sources by:
 - Reviewing information used to prioritize water bodies for screening or that was collected from the latest annual outfall survey.
 - Survey the general area and surrounding properties to identify potential sources of the illicit discharge (for example by using the phonebook, driving around, etc.)
4. Once potential discharge sites are identified, conduct individual site inspections to find source(s), characterize them, and ascertain responsibility.

IDDE-SOP7 – Enforcement

The illicit discharge enforcement and code compliance provisions of the KMC 13.11 provide ample process and authority to ensure compliance with this manual and local laws. Enforcement is through escalating enforcement procedures and actions. These include education to civil penalties to misdemeanor criminal penalties and/or imprisonment. Once the responsible parties are properly identified, they are to be approached in a positive manner, providing education relating to the illicit discharge and applicable ordinance concerns. Allow them to address their illicit discharge in a timely and satisfactory manner; and as appropriate, offer limited technical and compliance assistance such as the safe containment, cleanup, repair, and disposal and/or recycling of the illicit discharge. Continue involvement with the parties to ensure they addressed the illicit discharge and adequately addressed any potential public safety & health issues. If voluntary compliance is not progressing in an acceptable manner or within a time frame that would satisfy the Permit, issue a Notice and Order of Compliance for civil penalties. Various requirements to be included in this notice are listed in the KMC 13.11. The violator has the opportunity to appeal to the City hearings examiner. After non-compliance with the notice, proceed to criminal prosecution with the help of the City's legal department.

Stormwater Municipal IDDE Program

Criteria	Water Body					
	Tam 1 slough	Tam 2 slough	Coweeman slough	Baker Way slough	Elks slough	Cowliz River @ Cowlitz Way
Dominant Zoning	Residential	Residential	Residential	Industrial	Open space	Residential
Secondary Zoning	Commercial	Commercial	Commercial	Industrial	Residential	Commercial
Stormwater Permit holders	3	0	4	19	0	0
EPA-Regulated Facilities (Envirofacts)	9	0	8	30	0	0
Enforcement & Compliance History (ECHO)	5	0	5	17	0	0
Tier II spreadsheet on Air Quality - emitters	0	0	1	4	0	0

Relative Rating | Medium | Low | Medium | High | Low | Low

Note:

Zoning	Risk
Residential	Low
Commercial	Medium
Industrial	High

Priority Rating (1 is highest priority)	Water Body					
	Tam 1 slough	Tam 2 slough	Coweeman slough	Baker Way slough	Elks slough	Cowliz River @ Cowlitz Way
	2	4	3	1	6	5

POLICE DEPARTMENT PHASE II PERMIT STORMWATER TRAINING
Illicit Discharge Detection and Elimination Program

Abbreviated Training in a Bulleted List

- Stormwater Hotlines
Business Hours: 423-6590, After hours: 423-5730.
- Municipal Stormwater Permit requires that the City have an Illicit Discharge Detection and Elimination program. The City must investigate illicit discharges and try to eliminate them.
- Why do we need to protect stormwater?
 - ❖ Rainwater washes debris, chemicals, dirt, etc. into our ditches and rivers
 - ❖ This stormwater gets little to no treatment
 - ❖ Stormwater is the leading cause of water pollution in urban areas
 - ❖ The solution is for each of us to reduce pollution at its many sources
- Illicit Discharges – only stormwater is allowed to discharge into the stormwater system.
- Exemptions: Include emergency firefighting, clean groundwater, NPDES permitted discharges, air conditioner condensate and agriculture irrigation.
- Conditionally Allowed Discharges: Potable water, lawn and landscape irrigation, swimming pool discharges, street and sidewalk rinse water and construction site dewatering.
- Examples of Illicit Discharges:
 - ❖ Suds
 - ❖ Oil/gas
 - ❖ Dog poop
 - ❖ Leaf litter
 - ❖ Sanitary sewage
 - ❖ Industrial waste
- Field staff must be trained to identify & report illicit discharges during regular work hrs.
- Hotlines and Reporting: A Stormwater Hotline is a Permit requirement.
- What to Report: Who, what (pollutant and amount), when and where.
- How to Report: Call 911 or hotlines.
- Calling Priority:
 - ❖ Spills - Call 911 if an immediate potential to threaten safety or environment
 - ❖ Illicit Discharges – Call Van McKay at Public Works, 423-6590
 - ❖ Operations – Call Public Works after-hours hotline at 423-5730
- Spill Safety
 - ❖ Know the material, hazards and use proper Personal Protective Equipment
 - ❖ Hazardous material dangers may not be obvious
 - ❖ Use the Emergency Response Guidebook to identify materials/hazards and to establish protective zones
- Follow-up: The City (currently Van McKay) will investigate, document and take action on violations to the illicit discharge ordinance.
- The policy for illicit discharges is with increasing enforcement from education through misdemeanor.

APPENDIX D
IDDE Log Example

Appendix E Glossary

BMP	Best Management Practice
CDID#1	Consolidated Diking Improvement District #1
CDID#3	Consolidated Diking Improvement District #3
CFR	Code of Federal Regulations
CWP	Center for Watershed Protection
DID#1	Diking Improvement District #1
DOT	Department of Transportation
EPA	Environmental Protection Agency
ERG	Emergency Response Guide
GIS	Geographic Information System
IDDE	Illicit Discharge Detection and Elimination
IDLH	Immediately Dangerous to Life and Health
KMC	Kelso Municipal Code
LEL	Lower Explosive Limit
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollution Discharge Elimination System
NRC	National Response Center
ORI	Outfall Reconnaissance Inventory
OSHA	Occupational Safety and Health Administration
PPE	Personal Protection Equipment
SOP	Standard Operating Procedure
SWMP	Stormwater Management Program
US	United States
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

INTERLOCAL AGREEMENT
FOR MARKETING, PUBLIC EDUCATION AND OUTREACH

THIS INTERLOCAL AGREEMENT is made and entered into this _____ day of _____, 2011 by and between the CITY OF LONGVIEW, a municipal corporation of the State of Washington, hereinafter referred to as "Longview," the CITY OF KELSO, a municipal corporation of the State of Washington, hereinafter referred to as "Kelso," CONSOLIDATED DIKING IMPROVEMENT DISTRICT NO. 1 OF COWLITZ COUNTY, WASHINGTON, a special district organized and existing under the provisions of RCW Title 85, hereinafter referred to as "CDID No. 1;" and COWLITZ COUNTY, WASHINGTON, hereinafter referred to as "County;"

WITNESSETH;

WHEREAS, the Western Washington Phase II Municipal Stormwater Permit (Permit) issued by the Washington State Department of Ecology requires Longview, Kelso, and the County, to provide public education and outreach; and

WHEREAS, many of the topics and target audiences specified in the permit are consistent with ~~CDID No. 1~~ the Permit requirements and goals for each party; and

WHEREAS, under guidelines of the Permit, an education program may be developed regionally; and

WHEREAS, Longview, Kelso, the County, and CDID No. 1 are desirous and willing of collaboration; ;

NOW, THEREFORE, it is hereby agreed by and between the parties hereto as follows:

1. Longview, Kelso, County, and CDID No. 1 hereby grant permission to each other to develop and use public education and outreach methods in cooperation within their areas of Permit coverage. The permission herein granted shall be for an indefinite

4. No separate legal or administrative entity is intended to be created by this Agreement. The administration of the terms of this Agreement shall be jointly and cooperatively undertaken by the parties hereto.
5. No separate or joint budget is created by the Agreement, and this Agreement does not contemplate ~~departures~~ acquisition or disposal of any property except for such materials as may be acquired by any party for development and implementation of ~~such~~ public education and outreach or market research projects.
6. This ~~supersedes~~ agreement terminates and replaces the existing ~~2008~~ Interlocal Agreement for Marketing, Public Education and Outreach dated March 7, 2008.

This Agreement shall be reviewed by Longview, Kelso, the County, and CDID No. 1 each two years during the existence hereof for the purpose of examining the level of cooperation between the parties hereto and making whatever changes should then be deemed to be appropriate, and to investigate the level of usage of such materials in order to be assured that the continuation of this Agreement is reasonable.

IN WITNESS WHEREOF, this Agreement is hereby executed by the parties hereto on the date appearing opposite their signatures, below.

Date: _____, 2011.

THE CITY OF KELSO, WASHINGTON

By

Dennis Richards, City Manager

APPROVED AS TO FORM:

Janean Parker, Attorney for City of Kelso

Date: _____, 2011.

THE CITY OF LONGVIEW, WASHINGTON

By

Robert J. Gregory, City Manager

ATTEST:

Ann Davis, City Clerk

APPROVED AS TO FORM:

Marilyn K. Nitteberg-Haan, City Attorney