



CITY OF SPRINGFIELD STANDARD OPERATING PROCEDURE - 3c-01 ILLICIT DISCHARGE

Reason for Procedure:

- The purpose of the Illicit Discharge Detection and Elimination Program is to detect and eliminate sources of pollution to the municipal separate storm sewer system (MS4) as required under the permit to operate a Municipal Storm Sewer System (MS4) issued by the Florida Department of Environmental Protection. The goal of this plan is to identify and then eliminate illicit discharges.

Municipal Storm System Mapping:

- The City's storm system is mapped in GIS and Diamond Maps, outfall identification is listed in Diamond Maps. Updating and maintenance of Diamond Maps is ongoing. Inspections are tracked in Diamond Maps.

City Ordinance:

- In 2008 the City adopted Ordinance 479 concerning unlawful discharges to the stormwater system.

Identification of Priority Areas for Investigation:

- High priority areas such as mechanic businesses, fuel suppliers, chemical storage areas or active businesses dealing with grease, oils, chemicals, or any residence that have shown repeated prior issues or violations.
- Low priority areas will be anything within standard residential communities.

Annual Schedule for Proactive Inspections:

- All priority areas and facilities will be inspected at a minimum of once per month within the five year permit term. Inspections of priority areas and facilities will occur according to the potential risk factor associated with the area/facility. Priority facilities and areas within the City will be grouped into one of three categories of risk for potential illicit discharges: High Risk, Medium Risk and Low Risk, as a means to

identify, group and evaluate those facilities and areas of the City with the greatest potential for illicit discharges. For example, if an industrial area of the City has been deemed a high risk area for potential illicit discharges (e.g. auto repair warehouses, chemical storage warehouses, etc.); the facilities within that area will be evaluated and inspected every 30 days. If a facility is found to be a low or medium risk for potential illicit discharge, even though they may be physically located within an area deemed as a high risk area, those facilities will be evaluated and inspected less frequently.

- High Risk: Inspect one to two times per month
- Low Risk: Inspect once every month
- In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all maintenance activities within the City's Public Works Department. If a suspected illicit discharge/connection/dumping is identified, it is reported to the City's Code Enforcement.
- All appropriate field personnel receive Illicit Discharge Detection and Elimination identification and notification training. If a suspected illicit discharge is identified during the course of performing their regular activities, it is reported to the City's Code Enforcement.

Employee Training Requirements:

- Public Works and Code Enforcement employees will be trained annually on Illicit Discharge Detection and elimination policies and procedures.

Conducting Proactive Inspections

- Proactive inspections will be conducted according to the schedule set based on high and low risk areas and facilities by Code Enforcement inspectors. The inspector shall monitor the prioritized area and search for indications of illicit discharges/connections/dumping in to the City's MS4, in accordance with the training received. If any illicit connections are identified, the inspector will attempt to locate the source of the illicit discharge. The inspector shall conduct an illicit discharge and detection elimination inspection and record their findings in Comcate including photos if possible. If the source is identified and located, the inspector makes the decision to either approach the facility owner or refer the findings to their supervisor for further action.
- In speaking with the facility owner or operator, the inspector advises the facility owner/operator of the findings and cites the ordinance (Section 6 of ordinance 479, City of Springfield, Code of Ordinances) which prohibits such discharges. The inspector will return to verify that the problem has been corrected, if it has not the findings will be discussed with the inspectors supervisor for further action.
- Code Enforcement will conduct window inspections while traveling throughout the City and document the areas inspected on the Proactive Inspection Log.

- The City's Public Works Department regularly maintains and repairs the stormwater system. Proactive Illicit Discharge Detection and Elimination inspections may also take place during the inspection and maintenance of structural controls and other MS4 components by the City's Public Works Department personnel that are trained in illicit discharge identification and reporting.

Conducting Reactive Inspections

- Reactive inspections are initiated by a complaint or submittal from a citizen or outside party. These inspections are reactive and are specific to a location or entity. There is no prioritization or classification system associated for reactive inspections. Complaints can be made directly to Code Enforcement at 850-872-7570 x107.
- The inspector will attempt to locate the source of the illicit discharge and follow the same process listed when an illicit discharge is located during a proactive inspection.
- Complaints are taken by the City's Code Enforcement staff. The complaints are entered in to Comcate and all further action taken will be tracked in Comcate.

Tracking and Documentation

- All reactive inspections and proactive inspections of construction sites are logged and monitored in Comcate.
- All proactive window inspections are logged on the Proactive Inspection Log.

City of Springfield proactive window inspection log

City of Springfield
Illicit Discharge Proactive Inspection Log

Date	Zone	Discharge Found	Comments
	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		
	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		
	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		
	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20		
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City of Springfield proactive window inspection zones

