



CITY OF TITUSVILLE

Illicit Discharge Detection and Elimination Program

January 2021

The purpose of the Illicit Discharge Detection and Elimination (IDDE) Program is to detect and eliminate sources of pollution to the municipal separate storm sewer system (MS4) as required under the City of Titusville's Phase II MS4 Generic Permit Number FLR04E079. The goal of this plan is to identify and then eliminate illicit discharges.

IDDE program goals include, improving water quality in local waterways, increasing public awareness, educating and implementing best management practices, developing procedures to handle complaints and IDDE issues along with procedures and training of municipal staff.

The National Pollutant Discharge Elimination System (NPDES) permit sets forth the minimum elements of the plan which are listed below.

- Identification of priority areas for investigation
- Annual schedule for proactive inspections
- Employee training requirements
- Public Education
- SOPs for investigations, tracking and documentation

Municipal Storm System Mapping

The City has completed GIS mapping of the City's stormwater system, including outfall identification. Updating and maintenance of the GIS database is ongoing. The GIS system will be used to identify areas to be inspected and determine receiving waters if necessary.

City Ordinance

In 2004, the City adopted Ordinance 44-2004 concerning unlawful discharges to the stormwater system. See Appendix A for the full ordinance (Section 16-15, City of Titusville, Code of Ordinances).

Identification of Priority Areas for Investigation

For consistency with the City's MS4 NPDES permit, the following areas are considered a priority of the IDDE program:

- Industrial, commercial, or mixed use facilities that have a higher potential for illicit discharges
- Facilities or areas with history of past illicit discharges and/or illegal dumping
- Facilities or areas with direct connection to the Indian River Lagoon
- Facilities or areas of the City which were developed before regulations requiring stormwater treatment were in place

The City will utilize business license information and utility services information to target facilities that fall under a particular industry or commercial activity (e.g. concrete plants, automotive repair and body shops, etc.). The City will use historical references to identify potential areas where illicit discharges may be prevalent. These lists will be cross-referenced with the Florida Department of Environmental Protection (FDEP) list of facilities that have coverage under the Multi-Sector Generic Permit (MSGP).

The listing of facilities and updating of those priority listings/rankings will happen on a continuous basis.

Annual Schedule for Proactive Inspections

All priority areas and facilities will be inspected at minimum once 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. concrete mixing plants, auto repair warehouses, chemical storage warehouses, etc.); the facilities within that area will be evaluated and inspected every 12 months. 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.

Frequency of Inspections for Priority Areas and Facilities:

<u>High Risk</u>	<u>Medium Risk</u>	<u>Low Risk</u>
Once Every 12 Months	Twice Per Permit Term	Once Per Permit Term

In addition, inspections for signs of illicit discharges are part of the Standard Operating Procedure for all structural control inspections and 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 Stormwater Division for investigation under the Proactive IDDE program.

Finally, all appropriate field personnel receive IDDE 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 Stormwater Division for investigation under the Proactive IDDE program.

Public Education

The City's IDDE education and outreach program takes place at the staff and community level. Illicit discharge and stormwater educational materials can be found on the Stormwater Division webpage on the City's website. Educational materials are distributed at events and presentations throughout the year along with the annual stormwater newsletter that is mailed to all utility customers in the City. Informational brochures pertaining to illicit dumping and disposal of wastes are included in annual business license renewals for landscapers and lawn service professionals, restaurants, and car washes.

Employee Training Requirements

Public Works employees will be trained annually on IDDE policies and procedures.

Investigations, Tracking and Documentation

Standard Operating Procedure for Conducting Proactive Inspections

Proactive inspections will be conducted according to the schedule set based on high, medium, and low risk areas and facilities. The inspector shall monitor the prioritized area and search for indications of illicit discharges/connections/dumping into 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 IDDE inspection and record their findings on the City of Titusville IDDE Inspection Form (Appendix B) 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 finding to his/her 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 16-15, City of Titusville, Code of Ordinances) which prohibits such discharges. The inspector may use photo documentation to support the inspection. The inspector will return to verify that the problem has been corrected, if it has not the finding will be turned over to the City's Code Enforcement Division. If no source is identified, the findings are reported to the inspector's supervisor the City's Code Enforcement Division for further investigation.

The City's Public Works Department regularly maintains and repairs the stormwater system. Proactive IDDE 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.

Standard Operating Procedure for Conducting Reactive Inspections

Other methods of inspection for compliance come in the form of reactive inspections, which 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 the Reactive IDDE program. The Public Works Department maintains a hotline for citizens to report illicit discharge information, by calling (321) 383-5678.

The complaint or submittal is taken by the City's Streets and Stormwater staff. The complaints are entered into a database and a work order is generated. Public Works staff with appropriate training in IDDE will respond to the complaint.

The inspector will attempt to locate the source of the illicit discharge. The inspector shall conduct an IDDE inspection and record their findings on the City of Titusville IDDE Inspection Form (Appendix B) 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 finding to his/her 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 16-15, City of Titusville, Code of Ordinances) which prohibits such discharges. The inspector may use photo documentation to support the inspection. The inspector will return to verify that the problem has been corrected, if it has not the finding will be turned over to the City's Code Enforcement Division. If no source is identified, the findings are reported to the inspector's supervisor the City's Code Enforcement Division for further investigation.

Tracking and Documentation

Inspection dates will be logged and copies of all inspection forms will be kept with the NPDES documentation maintained by the Public Works Department.

Important Contact Information

Stormwater Complaint Hotline: (321) 567-3832

Code Enforcement Department: (321) 567-3770 or (321) 264-7800

Public Works Department: (321) 567-3846

Code Enforcement Complaint Submittal:

codeenforcement@titusville.com

City of Titusville webpage: <http://www.titusville.com/index.asp>

Appendix A - City of Titusville Code of Ordinances

Sec. 16-15. - Depositing trash on streets or in gutters or in stormwater system.

- (a) It shall be unlawful for any person to drain, deposit, place or otherwise discharge onto any street, gutter, ditch, lake, river, body of water, or any natural outlet or stormwater system within the city, or to cause or permit to be drained, deposited, placed or otherwise discharged into such waters, any organic or inorganic matter which causes or tends to cause pollution. Polluting matter includes, but is not limited to, the following:

Acids or alkalis.

Animal carcasses.

Antifreeze, and other automotive products.

Chemicals.

Chemically treated cooling water.

Construction materials.

Degreasers, solvents.

Dyes (without prior written permission of the administrator).

Heated water.

Laundry waste.

Lawn clippings, leaves, branches, etc.

Paints.

Pesticides, herbicides or fertilizers.

Pet waste.

Petroleum products, including but not limited to oil, gasoline, and grease.

Recreational vehicle waste.

Refuse.

Sanitary sewage.

Silt.

Soaps.

Steam cleaning waste.

Any groundwater which contains phosphorous or nitrogen concentrations greater than the surface water into which the groundwater is discharged.

Any water which exceeds the state surface water standards.

Solids in such quantities or of such size, capable of causing interference or obstruction to the flow in the city's stormwater system.

Toxic or poisonous solids or liquids.

- (b) It shall be unlawful to wash any public or private streets, sidewalks or parking areas into a gutter, outlet or stormwater system, unless all visible debris and sediments have been removed prior to washing. If the removal of the debris and sediments is not feasible (as determined by the city manager or designee), then the street, etc. may only be washed with the designee's prior written approval, which may include requirements to clean the affected drainage pipelines or provide treatment of washwater runoff to prevent downstream pollution. Only water may be used for washing purposes.

(Ord. No. 35-1997, § 1, 10-28-97; Ord. No. 44-2004, § 1, 7-27-04)

Appendix B - City of Titusville IDDE Investigation Form

CITY OF TITUSVILLE Illicit Discharge Detection and Elimination Investigation Form



<u>Date:</u>	<u>Inspection Type</u> Proactive Reactive
<u>W.O. #:</u>	<u>Inspector:</u>
<u>Location/Address:</u>	
<u>Description of Violation:</u>	
<u>Onsite Contact:</u>	<u>Contact Phone Number:</u>
<u>Investigation Notes:</u>	
<u>Action Taken:</u>	
<u>Date Violation Resolved:</u>	<u>Referred to Code Enforcement:</u> Yes No