



## Illicit Discharge Response

How to identify and respond to illegal discharges, spills & connections



Updated May 2016

This training is required for all municipal staff in Marin who, as part of their normal job responsibilities, may be notified of, come into contact with, or otherwise observe a water pollution issue.

**Please review the slides and associated notes to help recognize different types of water pollution issues that must be reported to your local stormwater program or other agency.**

By the end of the training, you should be able to:

1. Recognize different types of water pollution issues,
2. Know what should be reported to, and
3. How to contact the appropriate agency or staff person.

Additional resources are available at the Marin County Stormwater Pollution Prevention Program (MCSTOPPP) website – <http://www.mcstoppp.org> including the countywide Illicit Discharge and Spill Response Plan.

***This is a required training, so please be sure to complete the short survey at the end to register your training with MCSTOPPP.***

## Purpose of this Training

This training is to help you:

- **Identify illegal releases of materials** into a street, storm drain or surface water;
- **Know how to respond** (i.e. who to notify, what to report);
- **Understand the threats** to water quality, human health, aquatic life, and wildlife.

*Also – Training you is a requirement of your municipality's Phase II Stormwater Permit (issued by the State Water Board)*

NPDES permit requires a training program for all staff who, as part of their normal job responsibilities, may be notified of, come into contact with, or otherwise observe an illicit discharge or illegal connection to the storm drain system.

# What is an “Illicit Discharge”?

- The illegal or prohibited release of materials other than rainwater to the stormwater conveyance system (includes drainage ditches), or to a waterbody.\*
- Common sources:
  - Sanitary wastewater and septic tank effluent
  - Soil, construction materials, or chemicals from uncontrolled construction activities
  - Car wash wastewater
  - Improper oil disposal
  - Excess irrigation runoff (can carry pesticides, fertilizer...)
  - Spills from roadway accidents
  - Improper disposal of auto and household chemicals
  - Trash (poorly managed trash receptacles)
  - Mobile cleaning (power-washing, carpet cleaning, etc.)



*\*Some limited exceptions to prohibitions for certain discharges (provided steps are taken to minimize pollutants in runoff)*

## “Only Rain Down the Drain”

An Illicit Discharge occurs when any prohibited material (basically anything other than clean rain water) make’s it’s way into the municipal storm drain system (consisting of roads, roadside ditches, curbs and gutters, drop inlets or catch basins, underground pipes and culverts, swales or flood control facilities).

It is illegal for pollution of any kind moving through this system to be released (untreated) into our local creeks, bays or ocean.

This can be summed up by the slogan “**Only Rain Down the Drain**”

# What is an Illegal Connection?

- Unauthorized physical connection from a waste line (e.g. sewer lateral, sink drain line, etc.) to a municipal stormwater conveyance system. (cross connections either way are problem)



- Must be reported to **Environmental Health Services** and the **local Sanitary District**.

One way illegal connections happen is when a pipe carrying waste from a home or business is mistakenly connected to the storm drain system, resulting in the release of untreated waste into the environment. Illegal connections of stormwater into the sanitary sewer system can overwhelm treatment plants leading to sanitary sewer overflows.

Illegal connections are often discovered by roads crews or sanitary district staff performing maintenance duties on the systems.

**These types of issues should be referred IMMEDIATELY to:**

- Marin County Environmental Health Services 415-473-6907
- AND to the local sanitary district.

Your local stormwater program staff can assist you with the referral process.



## Why does it matter?



- Stormwater conveyance systems drain directly to creeks, rivers, bays or ocean, WITHOUT TREATMENT.



- Pollutants negatively impact aquatic life and the environment.
- *And, it's our responsibility under the Clean Water Act and the NPDES stormwater permit to prevent pollution.*

Notifying appropriate staff so that pollutant discharges can be stopped is important because stormwater is discharged directly to local waterways without passing through a treatment plant. This means that the pollutants carried by this stormwater can have direct negative impacts on aquatic life and other life that depends on it.

Also, it is our responsibility under the federal Clean Water Act and the State NPDES Stormwater Permit.

## Roles and Responsibilities

- What the pollutant is, how much of it there is, and where it is determines responsibilities and involvement of different agencies.

Type of Discharge	Primary Agency to Notify
Hazardous Materials and Waste	<ul style="list-style-type: none"><li>• Local Fire Department (911)</li><li>• Marin County CUPA</li></ul>
Sanitary Sewage	<ul style="list-style-type: none"><li>• Marin County Environmental Health</li><li>• Local Sanitary District</li></ul>
Spills into creeks, bays or the ocean	<ul style="list-style-type: none"><li>• San Francisco Bay Regional Water Quality Control Board</li><li>• CA Dept. of Fish and Wildlife</li></ul>
Spills on state highways	California Highway Patrol
Potable water from water supply system	Local Water District
Non-hazardous nuisance discharges	MCSTOPPP

Depending on the nature of the pollutant, how much of it there is and where it is can determine who it should be reported to, and who should respond.

Your local stormwater coordinator can assist or direct the appropriate response.

Some Examples...



Controlling pollution from active construction is a requirement of municipal code in every community in Marin. Sites must have adequate controls, or **Best Management Practices (BMPs)** in place to prevent the runoff of pollutants. Uncontrolled runoff of sediment, or soil track-out onto city streets can lead to aesthetic complaints, harm to local creeks, increased infrastructure maintenance costs and even flooding.

**BMPs:** May include: gravel bags, straw wattles, silt fencing, erosion control blankets, plastic sheeting, gravel or rumble strips at the site entrance, limiting ground disturbance and/or revegetation, or any number of other practices that are meant to keep soil particles from becoming detached, and if they are mobilized, to keep them from being transported off-site.



It's not just about dirt and soil. Lots of materials can become environmental pollutants. When workers or residents wash tools or dump waste waters into a street or driveway drain, it can quickly end up in the ocean. Potential pollutants include, but are not limited to, paints, plaster, drywall mud, debris, soaps or detergents, chemicals, etc).

**BMPs:** Small amounts of wash waters or liquid waste should be disposed of into the sanitary sewer (via a sink drain or toilet), larger quantities of liquid waste and solid wastes should be disposed of properly (check with the local sanitary district or sewer agency). Storm drain inlets near the job site should be protected to prevent intentional dumping or accidental spills.



Automotive fluids of all kinds (oil, grease, gasoline, brake and transmission fluids, antifreeze, washer fluid, etc) can become environmental pollutants if not properly contained, or if directly dumped into the storm drain system.

An oily sheen on the pavement or in the gutter during or after a rain may indicate runoff is picking up the everyday drips and drops of automotive fluids that our vehicles leave behind, or it may be an indicator of a more serious problem of uncontrolled spills or illegal dumping. These materials are particularly toxic to aquatic life and should be kept out of the storm drain network.

**BMPs:** Ideally, vehicle maintenance should be conducted in a covered location where runoff is minimized and spills can be contained and cleaned up before reaching the storm drain or creek.

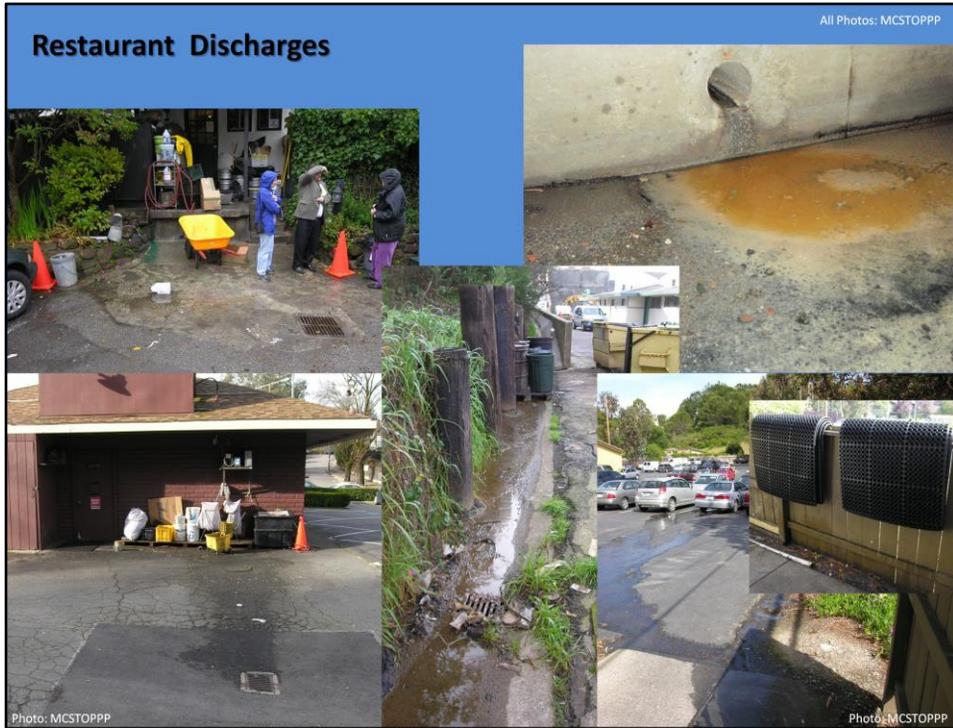


Due to the potential for immediate public health concerns, the **discharge of sewage into the environment is a serious issue that should be reported to the proper agency as soon as possible**. Such discharges can happen when there are problems with the sewage transmission lines or treatment plants, but they can also happen on the residential level when sewer laterals are broken or improperly connected to the storm drain system, when septic systems are not properly maintained, or when boats or recreational vehicles do not use appropriate pump-out stations to empty their waste holding tanks.

Evidence of a sewage discharge can include foul odors and/or wet toilet paper. Also, elevated bacteria and nutrient levels in water samples can result from sewage inputs.

In general, Marin County Environmental Health Services (415-473-6907) and the local sanitary district should be contacted. Your local stormwater coordinator can help refer these cases to the appropriate agencies for response.

**BMPs:** Properly maintain private septic systems and private sewer laterals to prevent unintentional discharges. Houseboats and other watercraft should use pump-out stations or services to properly remove waste for disposal.



Often identified during business inspections, activities such as cleaning of restaurant kitchen floor mats or emptying mop buckets can lead to stormwater pollution if done outside. Improper grease, oil or trash disposal can also lead to illegal discharges.

**BMPs:** Floor mats and mop buckets should be cleaned in a covered area that has a drain to sanitary (ideally, an inside area with a floor drain connected to the sanitary sewer system).



Dumpsters and trash cans can contribute to stormwater pollution when they are left uncovered or contain too much liquid. Uncovered trash bins catch rainwater which picks up pollutants (grease, oils, bacteria, dirt, etc) as it passes through the bin or dumpster on its way to the storm drain system.

Uncovered or overfilled trash bins also contribute to litter and trash in local waterways from wind-blown litter to scavenger activity (birds, raccoons, rodents, etc.).

Evidence of chronic issues can often be seen as pavement stains leading from the dumpster toward the storm drain system, or scattered trash in the immediate area.

**BMPs:** Cover trash receptacles, ensure adequate trash collection, inspect trash collection areas regularly to ensure proper containment.

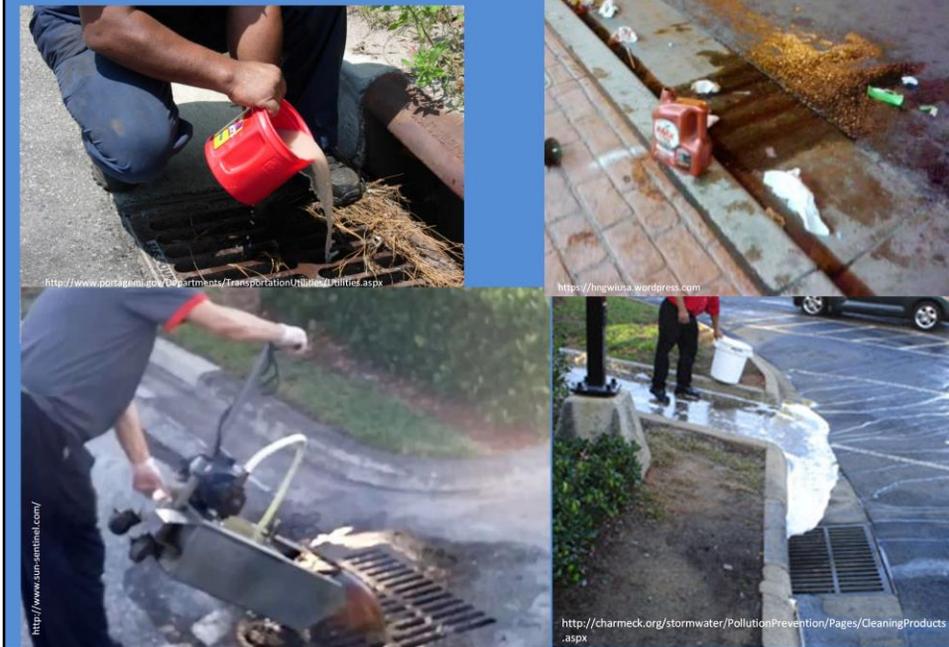
## Litter and Trash



Trash receptacles that are not properly maintained (i.e. covered and emptied regularly) can contribute to stormwater pollution through wind-blown trash or scavenger activity and the trash becomes litter in the environment. Illegal dumping of large materials or littering a single candy wrapper also contributes to trash loads. The litter is transported by wind and stormwater often directly into local waterways.

**BMPs:** Dispose of trash properly. Cover trash receptacles, schedule adequate trash pickups, inspect trash collection areas regularly to ensure proper containment. Report illegal dumping to the authorities

## Illegal Dumping



**Direct dumping of materials** (paint, concrete wash water, dirt, frying oil, motor oil, etc) **into the storm drain is ALWAYS ILLEGAL!** These concentrated pollutants will be transported to local waterways without treatment, leading to a degraded natural environment. Always report illegal dumping to your local stormwater coordinator. If you think that it is hazardous materials, contact 911 or the local Fire Department.

**BMPs:** Protect storm drains near construction sites. Label or stencil storm drains with a “No Dumping, Drains to Creek or Ocean” or similar message to inform the public. Stop direct dumping activities immediately. Educate employees, workers and the public.

## Wash Water and Detergents



Cleaning surfaces outdoors can lead to runoff of wash waters, detergents and materials washed from the surfaces. This type of discharge can result from residential car washing or surface power washing and can carry pollutants from the vehicle or surface, along with any solvents, soaps or detergents used in the cleaning, directly to local waterways. Also mobile cleaners such as carpet cleaners, mobile dog grooming or auto detailing generate waste water that should never be discharged to the storm drain system or local waterway.

**BMPs:** Wash cars at a commercial carwash where water is recycled and filtered. Contain residential car wash water or power washing waste in a location where it can infiltrate into the ground rather than running off to the storm drain system. Mobile cleaners should make arrangements with local sanitary districts to discharge waste water to the sanitary sewer system for treatment. Charity car wash events should utilize a MCSTOPPP car wash kit to help contain and infiltrate wash waters.

## Improper Material Storage



Material storage at construction sites, private residences and commercial areas including businesses and restaurants should be done to prevent rainwater from contacting chemicals, food waste or other pollutant sources. Ideally, storage of potential pollutants would be in a covered area, protected from contact with rain or runoff.

**BMPs:** Store materials in a covered area, consider secondary containment for chemical storage. Keep storage areas clean.

## Dumping Vegetation or Other Material Near Creeks



Loose or unconsolidated material such as wood chips, brush, sawdust, wood scraps, trash, etc that is placed near a watercourse or part of the storm drain system can be carried into local waterways by storm events. These materials can lead to increased nutrients and sediment loads or to decreased visibility in the water or even to flooding at downstream locations. Report this type of dumping to your local stormwater coordinator.

**BMPs:** Compost green waste in an appropriate location. Dispose of trash or other debris in an appropriate manner. Do not place anything close enough to the creek or storm drain system that it can be carried away by rainwater or storm flows in the creek.

## Irrigation Runoff (non-incident)



Overirrigation or broken irrigation systems can lead to runoff of water to the storm drain system or local waterway. Irrigation water typically contains chlorine or its by-products which can be toxic to aquatic organisms. In addition, irrigation water can carry fertilizers, pesticides and other chemicals directly to the storm drain system or local creek. Non-incident irrigation runoff can be due to excessive application, intentional overflow or negligence.

Report non-incident irrigation runoff to local stormwater coordinator or the local water district.

**BMPs:** Check the timing, amount and aim of sprinkler systems to minimize overspray. Inspect the system for leaks or broken sprinkler heads and repair as soon as located.

## What do I do when I see one?

- **Report to appropriate authorities.**
  - Provide date and time you became aware of the discharge, the approximate location, the nature of pollutant (if known), who was responsible (if known).

### What happens then?

- Formal response by appropriate authorities:
  - **Investigate** the complaint,
  - **Abate** the discharge (stop the discharge ASAP and mitigate environmental impacts), and
  - **Document** the response.

When you encounter any of these, or other, illegal discharges, please report to the appropriate authorities. Be prepared to provide basic information about the discharge. Provide any additional information like photographs, business names or license plates that will assist in the investigation.

Once you report the incident, the proper authorities will investigate the report, abate (or stop) the discharge and mitigate the environmental impacts (or require the discharger to do so), and document their response.

## Contacts

- **Hazardous material** or imminent threat to health of local waterway – Call 911 or your local Fire Dept.
- **Sanitary Sewage** – contact County Environmental Health (473-6907) and local Sanitary District (See Spill Response Plan)
- **Other Illegal Discharge** – Contact local stormwater personnel (See table on next slide)

If the discharge is, or may be, a hazardous material or is an imminent threat to the health of a local waterway, contact 911

If you suspect sewage to be involved, contact County Environmental Health and the local sanitary district (local stormwater coordinator can assist if needed)

All other illegal discharges, report directly to the local stormwater coordinator to investigate.

<b>Report Illegal Discharges to storm drains and/or creeks</b>		
<b>Belvedere</b>	(415) 435-3838	Scott Derdenger
<b>Corte Madera</b>	(415) 927-5057	Kevin Kramer
<b>County Unincorporated</b>	(415) 473-2745	Rob Carson
<b>Fairfax</b>	(415) 458-2370	Mark Lockaby
<b>Larkspur</b>	(415) 927-5020	Julian Skinner/Scott Metcho
<b>Mill Valley</b>	(415) 388-4848	Andrew Poster
<b>Novato</b>	(415) 899-8907	Manijeh Larizadeh
<b>Ross</b>	(415) 453-8287 (ext.163)	Rob Maccario
<b>San Anselmo</b>	(415) 258-4616	Sean Condry
<b>San Rafael</b>	(415) 485-3360	Diane Dillon
<b>Sausalito</b>	(415) 289-4176	Jonathon Goldman/Pat Guasco
<b>Tiburon</b>	(415) 435-7354	Pat Barnes/Dmitriy Lashkevich
<b>MCSTOPPP</b>	mcstoppp@marincounty.org	
<b>Website for reporting illegal discharges</b>		
<b>MCSTOPPP.org</b>		
<b>See "form" under Illegal discharge in side bar</b>		

\* Table updated: 6/6/2016

The following information must be in each fleet vehicle used by field staff. This is required by section E.7.ii.f. of the Phase II Permit.

Reporting an Illegal Stormwater Discharge	
To report illegal discharges to storm drains, creeks, or wetlands, call the numbers below or file an anonymous complaint online at <a href="http://www.mcstoppp.org">www.mcstoppp.org</a>	
After normal business hours	Contact County Sheriff's non-emergency line: 415-473-7233
Hazardous Materials or Hazardous Waste	<ul style="list-style-type: none"> <li>• Call 911 – Local Fire Department &amp; Marin County CUPA: 415-473-6647</li> </ul>
Sanitary Sewage	<ul style="list-style-type: none"> <li>• Marin County Environmental Health: 415-473-6907</li> <li>• Local Sanitary District</li> </ul>
Spills into creeks, bays or the ocean	<ul style="list-style-type: none"> <li>• San Francisco Regional Water Quality Control Board: 510-622-2300</li> <li>• California Department of Fish and Wildlife: 707-944-5500</li> <li>• California Office of Emergency Services (CalOES) 800-852-7550</li> </ul>
<b>Non-hazardous nuisance stormwater discharges (see jurisdiction contacts below)</b>	
Belvedere	415-435-3838
Corte Madera	415-927-5057
County of Marin	415-473-6528
Fairfax	415-453-1584
Larkspur	415-927-5017
Mill Valley	415-388-4033
Novato	415-899-8246
Ross	415-453-1453 ext. 163
San Anselmo	415-258-4600
San Rafael	415-485-3355
Sausalito	415-289-4100 ext. 106
Tiburon	415-435-7399

www.mcstoppp.org Or <http://www.marincounty.org/depts/pw/divisions/mcstoppp>

marincounty.org

COUNTY OF MARIN

Find services, forms and information Search

HOW/DO IT GOVERNMENT FOR RESIDENTS FOR BUSINESS RECREATION CONTACTS

You are here: Home > Departments > Public Works > MCSTOPPP: Stormwater Program

**MCSTOPPP: Stormwater Program**  
Raul M. Rojas, County Purchasing Agent, Director, Public Works

**Popular Links**

- How Do It?
- Contact Us
- Frequently Asked Questions
- Public Works Forms
- Fees
- What We Do

**Public Works**

**Divisions**

- Airport
- Building Maintenance
- Capital Projects
- Communications
- County Garage
- CUPA
- Disability Access
- Engineering
- Flood Control
- Land Use
- MCSTOPPP: Stormwater Program**
- Printing Services
- Purchasing
- Real Estate
- Roads
- Transportation
- Urban Search and Rescue
- Waste Management

**Contracting Opportunities**

**Green Resources**

- MCSTOPPP: Stormwater Program**
- Waste Management

**General Public and Schools**  
Resources for the residents, teachers and students of Marin County.

**Construction Projects**  
Information and best practices for individuals engaged in construction projects.

**Development Projects**  
Permit, best practices, and information for planning projects with new and redevelopment post construction stormwater treatment facilities

**Businesses**  
A listing of best management practices for Marin County businesses including horse boarding facilities and ownership.

**Creeks and Watersheds**  
Learn more about how you can protect Marin's creeks and watersheds.

Marin County Stormwater Pollution Prevention Program, MCSTOPPP, is a joint effort of Marin's cities, towns and the County. For more about MCSTOPPP...

**Illegal Discharge?**  
If you wish to report an illegal discharge into a storm drain, creek, bay or ocean, please complete this form or reach out to your local stormwater contact.

**More Information**

- Stormwater Contacts
- Stormwater Ordinances
- Municipal Staff Only
- About MCSTOPPP
- Phase II Permit
- Annual Reports

Anyone can anonymously report an illegal discharge here.

Anyone who becomes aware of an illegal discharge in Marin can report it anonymously on MCSTOPPP's website by filling out an online form, or looking up their local stormwater coordinator to place an anonymous phone call.

## Illicit Stormwater Discharge

Raul M. Rojas, County Purchasing Agent, Director, Public Works f t

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### Report Stormwater Pollution and Creek Violations

To report a hazardous materials spill or discharge or other emergency, please call 911. Also, call 911 if pollution is significant and/or an imminent threat to the health of a local waterway.

To report pesticide misuse, call the Marin County Department of Agriculture, Weights and Measures: 415-473-6700.

To report creek or creekside vegetation destruction, habitat destruction, fish kills, or poaching call the California Department of Fish and Wildlife: 1-888-334-2258.

Scroll down to report a spill or illegal discharge to a storm drain, creek, or other waterway using our **online form**. If you're witnessing a non-emergency spill or illegal discharge now, call your local stormwater coordinator **during normal business hours** or call your local law enforcement agency's non-emergency line **after normal business hours**.

In most cases, only clean rainwater may enter the storm drain system, including storm drains, curb inlets, underground pipes, streets, driveways, roads, gutters, and ditches. Help protect our local waterways by reporting spills and illegal discharges to storm drains.

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#### Stormwater Pollution Reporting Form

DPW Tag No.:

For department use only

<b>Date Found:</b>	<b>Today's Date</b>
Month: <span style="border: 1px solid gray; padding: 2px;">Nov</span> Day: <span style="border: 1px solid gray; padding: 2px;">24</span> Year: <span style="border: 1px solid gray; padding: 2px;">2015</span>	Month: <span style="border: 1px solid gray; padding: 2px;">Nov</span> Day: <span style="border: 1px solid gray; padding: 2px;">24</span> Year: <span style="border: 1px solid gray; padding: 2px;">2015</span>

Time of Day Found:

Weather Conditions:

Name of Reporting Agency (if relevant):

How Was the Discharge Found?

Just a brief description of how you found the discharge. For example: "I was walking the dog and noticed the discharge as I passed the drain," or "I work for the City picking the street newspaper and found the discharge on my rounds."

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**Discharge Was Found in or Around**

Location of Discharge:

Other Explanation:

This is the beginning of the anonymous illicit stormwater discharge report form on the MCSTOPPP website.

## REQUIRED to Complete Training

In order to complete your training, click on the link below to register and fill out a brief assessment.

<https://www.surveymonkey.com/r/CF8MKD6>