Illicit Discharge Detection and Elimination Program Plan

City of Lenexa, Kansas
Community Development Department

Revised
December 2012

Lenexa
KANSAS

Table of Contents

Regulatory Background

On October 1, 2004, the City of Lenexa was issued a Phase II NPDES permit which required best management practices (BMPs) to be implemented in six program areas. These program areas include: public education and outreach, illicit discharge detection and elimination (IDDE), control of construction site runoff, post-construction storm water management, and pollution prevention/good housekeeping. As required by the Phase II NPDES permit, the City of Lenexa developed a Storm Water Management Plan which addressed the six required program elements. In accordance with the Storm Water Management Plan, the City of Lenexa has developed an Illicit Discharge Detection and Elimination (IDDE) program to reduce pollutants entering the City's storm sewer system. This Plan includes policies and procedures for implementing Lenexa's IDDE Program.

Lenexa IDDE Ordinance

The IDDE program implements and enforces the City's ordinance entitled "Illicit Discharges to Storm Sewers and Surface Waters", which was adopted by City Council in August 2006 and revised in December 2011. A copy of this ordinance is included in Attachment I. This ordinance specifically prohibits the discharge of trash, yard wastes, lawn chemicals, pet waste, wastewater, petroleum products, cleaning products, paint products, hazardous waste, sediment and other pollutants into the City's storm drainage system. Violation of this ordinance is a public offense and may carry fines of up to $2,500 per day, per violation, court appearances or other penalties as outlined in section 1-1-C-3. Restrictions and regulations within the ordinance are intended to protect the health and safety of citizens, preserve the economic and ecological value of existing water resources, and to comply with the City's NPDES permit.

Program Contact Information and Staff Responsibilities

Dale Clark, Stormwater Technician II, is the primary point of contact for Lenexa's IDDE Program. Mr. Clark can be reached at 913-477-7685 (office), 913-238-0905 (cell phone), or emailed at dclark@lenexa.com

If City of Lenexa staff are not available, illicit discharges should be reported to the Johnson County Environmental Department 24 Hour Response Service at 913-715-6900. Illicit discharges can also be reported online at http://stormwaterpollution.jocogov.org//. Discharges of hazardous materials or other emergencies should be reported to the Lenexa Fire Department at 911.

The following table shows City staff and their IDDE Program responsibilities:

City Staff	Position	Program Management	Field Investigation	Discharge Elimination	Compliance Enforcement
Tom Jacobs	Stormwater Engineer	✓			
Dale Clark	Stormwater Technician II		✓	✓	✓
Ted Semadeni	Stormwater Superintendent		✓		✓
Justin Stuedeman	Stormwater Specialist		✓	✓	✓
Angel Whitaker	Code Enforcement Supervisor				✓

Public Outreach and Staff Training

The City of Lenexa, in cooperation with the Johnson County Stormwater Program and the Mid-America Regional Council (MARC), is implementing an education and outreach program designed to build public awareness of illicit discharge issues. Concerned citizens are encouraged to report suspected illicit discharges via Johnson County's internet based Stormwater Pollution Reporting System at http://stormwaterpollution.jocogov.org//.

Staff will receive annual IDDE training during "All Hands" meetings, which are attended by all Lenexa Municipal Services staff. Training materials will include videos and Power Point presentations which show examples of illicit discharges and remedial activities.

Illicit Discharge Detection

The following methods will be used in Lenexa to identify illicit discharges.

Outfall Inventory-Lenexa's storm sewer inlets and outfall locations have been digitized to create a GIS layer. A map showing storm sewer outfall locations has been submitted to KDHE, as required by our NPDES permit. Outfall location maps are included as Attachment II.

Storm Sewer Investigations-The Stormwater Maintenance Crew will play a critical role in the detection and elimination of illicit discharges, because they routinely examine and maintain storm sewer infrastructure in Lenexa. The Crew inspects approximately 25% of the City's storm sewer infrastructure each year. During routine infrastructure inspections, storm sewer outfalls are inspected for staining, odors, dry weather flows, and other indicators of illicit discharge. All findings are recorded on Outfall Reconnaissance Inventory forms (see Attachment III). All field data will be entered in the City's Lucity database for long term storage.

Public Complaints-Through education and outreach efforts, the City of Lenexa will increase the general public's awareness of illicit discharges and related best management practices. Consequently, the general public will be encouraged to report suspected illicit discharges online via the Johnson County Stormwater Pollution Reporting System. This system automatically notifies the Stormwater Technician whenever an illicit discharge is reported for Lenexa. Complaints and resulting staff investigations will be tracked in Accela's Service Request module.

Pollution Investigations-The Stormwater Technician will investigate all suspected illicit discharges and document field observations in case enforcement actions are taken. Standard field equipment may include waders, measuring tape, watch, camera, white board (for numbering photos with outfall IDs), spray paint (for marking outlet pipes), rubber gloves, and laboratory supplied sample containers.

All flowing outfalls will be investigated for illicit discharge contaminants. Obvious discharges of hazardous materials (gas, diesel, chemicals, etc.) will be reported to the Lenexa Fire Department via the 911 system. Investigations of unknown substances will be coordinated with Johnson County Environmental. If needed, water quality samples will be collected to identify illicit discharge contaminants and target potential waste streams. Samples will be collected in coordination with Johnson County Environmental Laboratories for analysis. Sampling results will be compared to reference waste stream "chemical fingerprints" compiled by the Johnson County Environmental Department.

After the waste stream characteristics have been identified, the Stormwater Technician will coordinate with the Stormwater Maintenance Crew to investigate potential illicit discharge sources. A mobile video camera will be used to investigate storm sewer infrastructure and additional investigative methods (i.e. dye or smoke testing, caulk dams, etc.) will also be used if necessary. Final determination of the illicit discharge will possibly require facility inspections. If an inspection of a facility is required, notification to the facility owner or manager and scheduling of the inspection will be required.

Illicit Discharge Elimination

After an illicit discharge has been detected and traced to the source, the Stormwater Technician will work with the responsible party to abate the discharge and initiate remediation activities. Acute or chronic discharges may be issued a ticket for violating Municipal Code, resulting in fines, court appearances and/or cleanup costs. Responsible parties with direct discharges (illicit cross connections) to the storm sewer system will be required to have a licensed plumber re-route the pipe to an appropriate discharge point and repair any damaged storm sewer pipes. Responsible parties with indirect discharges (illicit dumping) will be required to cease the discharge activities,

may receive a ticket and may be required to remediate any impacted storm sewer infrastructure and receiving water way.

Compliance and enforcement activities will be coordinated within City Community Development staff. If needed, Police Department support will be used to address acute discharges, chronic offenders or enforcement activities (writing tickets).

Attachment I
Article 4-5-J: Illicit Discharges to Storm Sewers and Surface Waters

City of Lenexa

Lenexa City Code

Article 4-5-J ILLICIT DISCHARGES TO STORM SEWERS AND SURFACE WATERS

Sections:

Section 4-5-J-1 PURPOSE AND FINDINGS.

A. Purpose. The purpose of this Article shall be to prevent the discharge of pollutants from land and activities within the City into the municipal separate storm sewer system (MS4) and/or into surface waters.

B. Findings. The City Council of the City hereby finds that:

1. Pollutants are discharged into surface waters, both through inappropriate non-stormwater discharges into the MS4 or the surface waters directly, and through the wash off and transport of pollutants found on the land and built surfaces by stormwater during rainfall events.

2. Such discharge of pollutants may lead to increased risks of disease and harm to individuals, particularly children, who come into contact with the water; may degrade the quality of such water for human uses, such as drinking, irrigation, recreation, and industry; and may damage the natural ecosystems of rivers, streams, lakes and wetlands, leading to a decline in the diversity and abundance of plants and animals.

3. This Article will promote public awareness of the hazards associated with the improper discharge of trash, yard waste, lawn chemicals, pet waste, wastewater, oil, petroleum products, cleaning products, paint products, hazardous waste, sediment and other pollutants into the storm drainage system.

4. Such discharges are inconsistent with the provisions and goals of the Clean Water Act, the National Pollutant Discharge Elimination System (NPDES), the City of Lenexa Stormwater Management Program and other federal and state requirements for water quality and environmental preservation.

5. A reasonable establishment of restrictions and regulations on activities within the City is necessary to eliminate or minimize such discharges of pollutants, to protect the health and safety of citizens, to preserve economic and ecological value of existing water resources within the City and within downstream communities, and to comply with the provisions of and the City's responsibilities under the Clean Water Act and the NPDES program.

Section 4-5-J-2 ABBREVIATIONS.

The following abbreviations when used in this Article shall have the designated meanings:

BMP Best Management Practice
CFR Code of Federal Regulations
EPA Environmental Protection Agency
HHW Household Hazardous Waste
KDHE Kansas Department of Health and Environment
MS4 Municipal Separate Storm Sewer System
NPDES National Pollutant Discharge Elimination System
PST Petroleum Storage Tank

Section 4-5-J-3 SPECIAL DEFINITIONS OF TERMS AND USES.

For the purposes of this Article, the following definitions shall apply:

BEST MANAGEMENT PRACTICES (BMPs): Schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to stormwater, receiving waters, or stormwater conveyance systems. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

CLEAN WATER ACT: The federal Water Pollution Control Act (33 U.S.C. Section 1251 et seq.), and any subsequent amendments thereto.

DIRECTOR: The Director of Community Development Department or the Director's designee.

DISCHARGE: The addition or introduction, directly or indirectly, of any pollutant, water, or any other substance into the MS4 or surface waters.

DOMESTIC SEWAGE: Human excrement, gray water (from home clothes washing, bathing, showers, dishwashing, and food preparation), other wastewater from household drains, and waterborne waste normally discharged from the sanitary conveniences of dwellings (including apartment houses and hotels), office buildings, retail and commercial establishments, factories, and institutions, that is free from industrial waste.

EXTREMELY HAZARDOUS SUBSTANCE: Any substance listed in the appendices to 40 CFR Part 355, Emergency Planning and Notification.

FERTILIZER: A substance or compound that contains a plant nutrient element in a form available to plants and is used primarily for its plant nutrient element content in promoting or stimulating growth of a plant or improving the quality of a crop, or a mixture of two or more fertilizers.

HAZARDOUS HOUSEHOLD WASTE (HHW): Any material generated in a household (including single and multiple residences) by a consumer which, except for the exclusion provided in 40 CFR Section 261.4(b)(1), would be classified as a hazardous waste under 40 CFR Part 261 or K.A.R 28-29-23b.

HAZARDOUS SUBSTANCE: Any substance listed in Table 302.4 of 40 CFR Part 302.

HAZARDOUS WASTE: Any substance identified or listed as a hazardous waste by the EPA pursuant to 40 CFR Part 261.

INDUSTRIAL WASTE: Any waterborne liquid or solid substance that result from any process of industry, manufacturing, mining, production, trade, or business.

MOTOR VEHICLE: Any vehicle meeting the definition for passenger car, passenger van, pickup truck, motorcycle, recreational vehicle, or motor home given in *Section 3-8-G-3* of the Code.

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4): The system of conveyances, (including roads with drainage systems, municipal streets, private streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned and operated by the City and designed or used for collecting or conveying stormwater, and which is not used for collecting or conveying sewage.

NPDES: The national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements under Sections 307, 402, 318 and 405 of the federal Clean Water Act.

NPDES PERMIT: A permit issued by United States Environmental Protection Agency (EPA) or the State of Kansas that authorizes the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

OIL: Any kind of oil in any form, including but not limited to: petroleum, fuel oil, crude oil, synthetic oil, motor oil, bio-fuel, cooking oil, grease, sludge, oil refuse, and oil mixed with waste.

PESTICIDE: A substance or mixture of substances intended to prevent, destroy, repel, or migrate any pest, or substances intended for use as a plant regulator, defoliant, or desiccant.

PETROLEUM PRODUCT: A product that is obtained from distilling and processing crude oil and that is capable of being used as a fuel or lubricant in a motor vehicle, boat or aircraft including motor oil, motor gasoline, gasohol, other alcohol blended fuels, aviation gasoline, kerosene, distillate fuel oil, and #1 and #2 diesel fuel.

POLLUTANT: Any substance or material which contaminates or adversely alters the physical, chemical or biological properties of the waters including changes in temperature, taste, odor, turbidity, or color of the water. Such substance or material may include but is not limited to, dredged spoil, spoil waste, incinerator residue, sewage, pet and livestock waste, garbage, sewage sludge, munitions, chemical waste, biological materials, radioactive

materials, heat, wrecked or discarded equipment, rock, sand, soil, yard waste, hazardous household wastes, oil and petroleum products, used motor oil, anti-freeze, litter, pesticides, and industrial, municipal, and agricultural waste discharged into water.

PROPERTY OWNER: The named property owner as indicated by the records of the Johnson County Kansas Records and Tax Administration;

RELEASE: Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the MS4 and/or surface waters.

SANITARY SEWER: The system of pipes, conduits, and other conveyances which carry industrial waste and domestic sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, to a sewage treatment plant and to which stormwater, surface water, and groundwater are not intentionally admitted.

SEPTIC TANK WASTE: Any domestic sewage from holding tanks such as vessels, chemical toilets, campers, trailers, and septic tanks.

SEWAGE: The domestic sewage and/or industrial waste that is discharged into the sanitary sewer system and passes through the sanitary sewer system to a sewage treatment plant for treatment.

STORMWATER: Stormwater runoff, snow melt runoff, and surface runoff and drainage.

SURFACE WATERS: Any body of water classified as "surface waters" by the State of Kansas, including streams, rivers, creeks, brooks, sloughs, draws, arroyos, canals, springs, seeps, cavern streams, alluvial aquifers associated with these surface waters, lakes, man-made reservoirs, oxbow lakes, ponds, and wetlands, as well as any other body of water classified by the federal government as a "water of the United States".

WASTE: Any garbage, refuse, sludge or other discarded material which is abandoned or committed to treatment, storage or disposal, including solid, liquid, semisolid or contained gaseous materials resulting from industrial, commercial mining, community and agricultural activities. Waste does not include solid or dissolved materials in domestic sewage or irrigation return flows or solid or dissolved materials or industrial discharges which are point sources subject to permits under the State of Kansas.

Section 4-5-J-4 GENERAL PROHIBTION.

A. No person shall release or cause to be released into the MS4, or into any surface water within the City, any discharge that is not composed entirely of stormwater that is free of pollutants, except as allowed in subsection B.

B. Unless identified by the City or KDHE as a significant source of pollutants to surface water, the following non-stormwater discharges are deemed acceptable and not a violation of this section:

1. Discharges authorized by, and in full compliance with, a NPDES permit;
2. Water line flushing;
3. Diverted stream flow;
4. Rising groundwater;
5. Uncontaminated groundwater infiltration as defined under 40 CFR 35.2005 (20) to separate storm sewers;
6. Uncontaminated pumped groundwater;
7. Contaminated groundwater if authorized by KDHE and approved by the City;
8. Discharges from potable water sources;
9. Foundation drains;
10. Air conditioning condensate;
11. Lawn watering, landscape irrigation or other Irrigation waters;
12. Springs;
13. Water from crawl space pumps;
14. Footing drains;
15. Individual residential motor vehicle washing;
16. Flows from riparian habitats and wetlands;
17. Dechlorinated swimming pool discharges excluding filter backwash;

18. Street wash waters (excluding street sweepings which have been removed from the street);
19. Discharges or flows from fire fighting activities;
20. Heat pump discharge waters (residential only);
21. Treated wastewater or other discharges meeting requirements of a NPDES permit; and
22. Other discharges determined by the Federal Government, State of Kansas, or City of Lenexa not to be a significant source of pollutants to waters of the state, a public health hazard or a nuisance.
23. Discharges specified in writing by the Director as being necessary to protect public health and safety.

C. Notwithstanding the provisions of subsection B of this section, any discharge shall be prohibited by this section if the discharge in question has been determined by the Director to be a source of a pollutants to the MS4 or to surface waters, written notice of such determination has been provided to the property owner or person responsible for such discharges, and the discharge has occurred more than ten days beyond such notice.

Section 4-5-J-5 SPECIFIC PROHIBITIONS AND DUTIES.
The specific prohibitions and requirements in this section do not include all the discharges prohibited by the general prohibition set forth in *Section 4-5-J-4*, but are provided to address specific discharges that are frequently found or are known to occur:

A. No person shall release or allow to be released any of the following substances into the MS4:
1. Any new or used petroleum product or oil;
2. Any industrial waste;
3. Any hazardous substance or hazardous waste, including household hazardous waste;
4. Any domestic sewage or septic tank waste, grease trap or grease interceptor waste, holding tank waste, or grit trap waste;
5. Any garbage, rubbish or other waste;
6. Any new or used paints, including latex-based paints, oil-based paints, stains, varnish, and primers, as well as cleaning solvents and other associated products;
7. Any yard wastes which have been moved or gathered by a person;
8. Any wastewater that contains soap, detergent, degreaser, solvent, or surfactant based cleaner from a commercial motor vehicle wash facility; from any vehicle washing, cleaning, or maintenance at any new or used motor vehicle dealership, rental agency, body shop, repair shop, or maintenance facility; or from any washing, cleaning, or maintenance of any business or commercial or public service vehicle, including a truck, bus or heavy equipment;
9. Any wastewater from a commercial mobile power washer or from the washing or other cleaning of a building exterior that contains soap, detergent, degreaser, solvent, or any surfactant based cleaner;
10. Any wastewater from commercial floor, rug, or carpet cleaning;
11. Any wastewater from the washdown or other cleaning of pavement that contains any soap, detergent solvent, degreaser, emulsifier, dispersant, or other cleaning substance; or any wastewater from the wash-down or other cleaning of any pavement where any spill, leak, or other release of oil, motor fuel, or other petroleum or hazardous substance has occurred, unless all such materials have been previously removed;
12. Any effluent from a cooling tower, condenser, compressor, emissions scrubber, emission filter, or the blowdown from a boiler;
13. Any ready-mixed concrete, mortar, ceramic, or asphalt base material or discharge resulting from the cleaning of vehicles or equipment containing or used in transporting or applying such material;

14. Any runoff, washdown water or waste from any animal pen, kennel, fowl or livestock containment area or any pet wastes generally;

15. Any filter backwash from a swimming pool or fountain, except that nothing in this Article shall be construed as to require the alteration of the filter discharge plumbing of an existing swimming pool, fountain or spa if such plumbing was compliant with applicable state, federal, and local regulations at the time of construction;

16. Any swimming pool, fountain or spa water or other water containing a harmful level of chlorine (>0 parts per million), muriatic acid or other chemical used in the treatment or disinfection of the water or during cleaning of the facility;

17. Any discharge from water line disinfection by super chlorination if it contains a harmful level of chlorine (>0 parts per million) at the point of entry into the MS4 or surface waters;

18. Any contaminated runoff from a vehicle wrecking or storage yard;

19. Any substance or material that will damage, block, or clog the MS4;

20. Any release from a petroleum storage tank (PST), or any leachate or runoff from soil contaminated by leaking PST; or any discharge of pumped, confined, or treated wastewater from the remediation of any such PST release, unless the discharge has received an NPDES permit from the state; or

21. Any other discharge that causes or contributes to causing the City to violate a state water quality standard, the City's NPDES stormwater permit, or any state-issued discharge permit for discharges from its MS4.

B. No person shall release or cause to be released into the MS4 any harmful quantity of sediment, silt, earth, soil, or other material associated with clearing, grading, excavation or other construction activities in excess of what could be retained on site or captured by employing sediment and erosion control measures, except as allowed for in conformance with subsection 4-5-J-4-B.

C. No person shall connect a line conveying sanitary sewage, domestic or industrial, to the MS4. No property owner shall allow such a connection to continue in use on their property.

D. No person shall use pesticides, herbicides and fertilizers except in accordance with manufacturer recommendations. Pesticides, herbicides and fertilizers shall be stored transported and disposed of in a manner to prevent release to the MS4.

E. No person shall tamper with, destroy, vandalize, or render inoperable any BMPs which have been installed for the purpose of eliminating or minimizing pollutant discharges, nor shall any person fail to install or fail to properly maintain any BMPs which have been required by the City or by other local, state, or federal jurisdictions.

Section 4-5-J-6 INSPECTION AND DETECTION PROGRAM.

The Director is authorized to develop and implement a plan to actively detect and eliminate prohibited discharges and connections to the MS4 or surface waters within the City. Such plan may include, but is not limited to, periodic and random inspections of facilities and businesses, particularly those most associated with potentially prohibited discharges; visual surveys of exterior practices; inspection, sampling and analyses of discharges from outfalls of the MS4, particularly during dry weather periods; manhole and pipe inspections to trace discharges through the system to point of origin; education on pollution prevention; and receipt of complaints and information from the public regarding known or suspected discharges.

Section 4-5-J-7 RELEASE REPORTING AND CLEANUP.

A. Any person responsible for the release of any prohibited material that may flow, leach, enter, or otherwise be released into the MS4 or surface waters shall take all necessary steps to ensure the containment and cleanup of such release.

B. In the event of such a release of hazardous materials said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services.

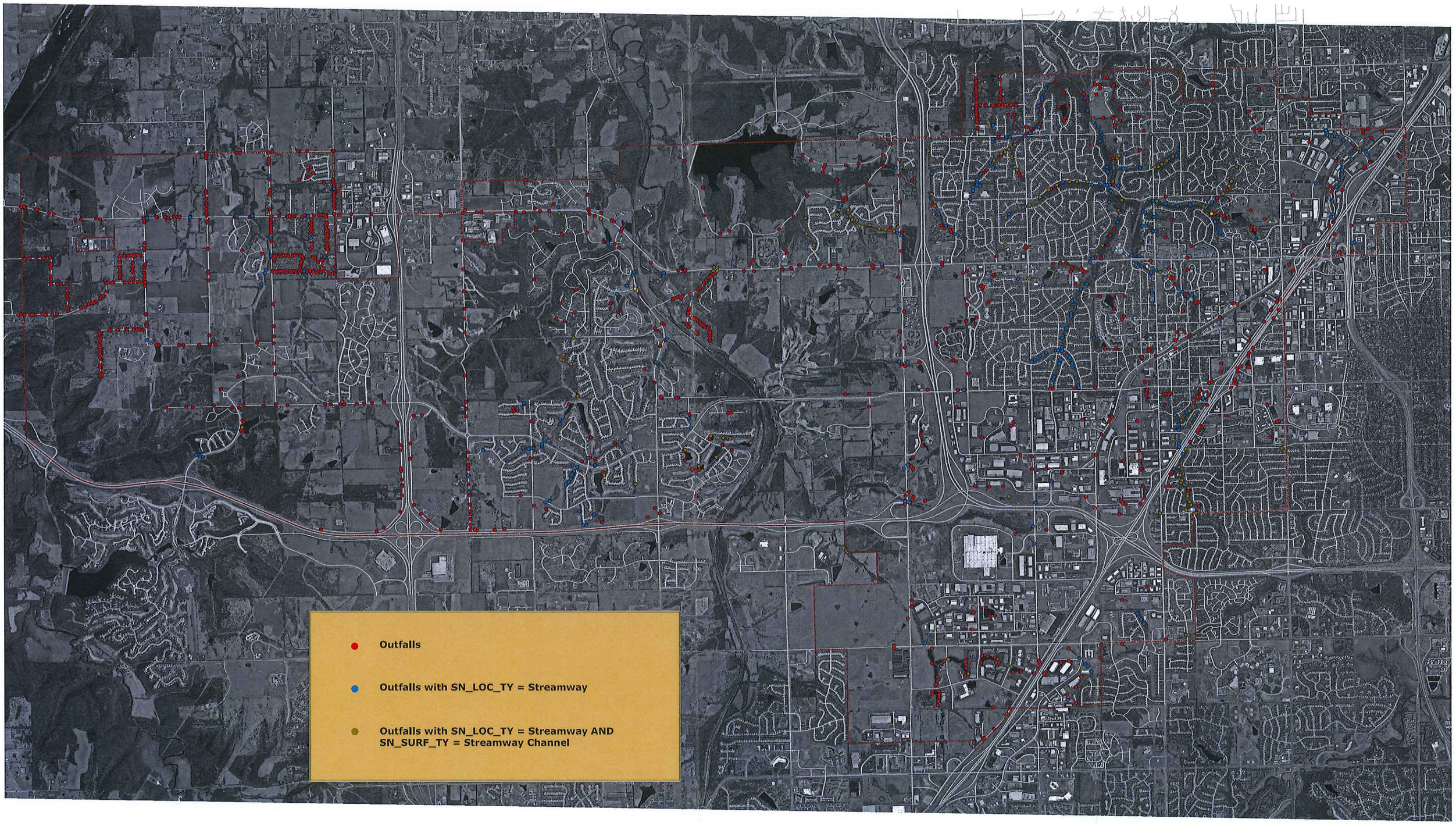
C. In the event of a release of non-hazardous materials, said person shall notify the

Director in person or by phone or facsimile no later than the next business day. Notifications in person or by phone shall be confirmed by written notice addressed and mailed to the Director within three business days of the phone notice.

Section 4-5-J-8 ENFORCEMENT; DESIGNATION OF OFFICER; ABATEMENT; RIGHT OF ENTRY; PENALTY.

The Director shall be designated as the public officer charged with the administration and enforcement of this Article and shall authorize the investigation of violations of the Article. Any person convicted of a violation of any provisions of this Article shall be deemed guilty of a public offense and subject to the penalties set forth in *Section 1-1-C-3* of this Code. In addition, the City may seek such additional remedies and have such additional enforcement powers as set forth in *Section 4-1-L-2* of this Code.

Attachment II
Storm Sewer Outfall Maps


Outfalls
Outfalls with SN_LOC_TY = Streamway
Outfalls with SN_LOC_TY = Streamway AND SN_SURF_TY = Streamway Channel

Attachment III
Outfall Reconnaissance Inventory Forms

OUTFALL RECONNAISSANCE INVENTORY/ SAMPLE COLLECTION FIELD SHEET

Section 1: Background Data

Subwatershed:		Outfall ID:	
Today's date:		Time (Military):	
Investigators:		Form completed by:	
Temperature (°F):	Rainfall (in.): Last 24 hours:	Last 48 hours:	
Latitutde:	Longitude:	GPS Unit:	GPS LMK #:
Camera:		Photo #s:	

Land Use in Drainage Area (Check all that apply):

☐ Industrial ☐ Open Space

☐ Ultra-Urban Residential ☐ Institutional

☐ Suburban Residential Other: _____

☐ Commercial Known Industries: _____

Notes (e.g.., origin of outfall, if known):

Section 2: Outfall Description

LOCATION	MATERIAL	SHAPE		DIMENSIONS (IN.)	SUBMERGED
☐ **Closed Pipe**	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other: _____	☐ Circular ☐ Eliptical ☐ Box ☐ Other: _____	☐ Single ☐ Double ☐ Triple ☐ Other: _____	Diameter/Dimensions: _____	In Water: ☐ No ☐ Partially ☐ Fully With Sediment: ☐ No ☐ Partially ☐ Fully
☐ **Open drainage**	☐ Concrete ☐ Earthen ☐ rip-rap ☐ Other: _____	☐ Trapezoid ☐ Parabolic ☐ Other: _____		Depth: _____ Top Width: _____ Bottom Width: _____	
☐ **In-Stream**	**(applicable when collecting samples)**				
Flow Present?	☐ Yes ☐ No *If No, Skip to Section 5*				
Flow Description (If present)	☐ Trickle ☐ Moderate ☐ Substantial				

Section 3: Quantitative Characterization

FIELD DATA FOR FLOWING OUTFALLS				
PARAMETER		**RESULT**	**UNIT**	**EQUIPMENT**
☐Flow #1	Volume		Liter	Bottle
	Time to fill		Sec	
☐Flow #2	Flow depth		In	Tape measure
	Flow width	____' ____"	Ft, In	Tape measure
	Measured length	____' ____"	Ft, In	Tape measure
	Time of travel		S	Stop watch
Temperature			°F	Thermometer
pH			pH Units	Test strip/Probe
Ammonia			mg/L	Test strip

Outfall Reconnaissance Inventory Field Sheet

Section 4: Physical Indicators for Flowing Outfalls Only

Are Any Physical Indicators Present in the flow? ☐ Yes ☐ No *(If No, Skip to Section 5)*

INDICATOR	CHECK if Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)		
Odor	☐	☐ Sewage ☐ Rancid/sour ☐ Petroleum/gas ☐ Sulfide ☐ Other:	☐ 1 – Faint	☐ 2 – Easily detected	☐ 3 – Noticeable from a distance
Color	☐	☐ Clear ☐ Brown ☐ Gray ☐ Yellow ☐ Green ☐ Orange ☐ Red ☐ Other:	☐ 1 – Faint colors in sample bottle	☐ 2 – Clearly visible in sample bottle	☐ 3 – Clearly visible in outfall flow
Turbidity	☐	See severity	☐ 1 – Slight cloudiness	☐ 2 – Cloudy	☐ 3 – Opaque
Floatables -Does Not Include Trash!!	☐	☐ Sewage (Toilet Paper, etc.) ☐ Suds ☐ Petroleum (oil sheen) ☐ Other:	☐ 1 – Few/slight; origin not obvious	☐ 2 – Some; indications of origin (e.g., possible suds or oil sheen)	☐ 3 - Some; origin clear (e.g., obvious oil sheen, suds, or floating sanitary materials)

Section 5: Physical Indicators for Both Flowing and Non-Flowing Outfalls

Are physical indicators that are not related to flow present? ☐ Yes ☐ No *(If No, Skip to Section 6)*

INDICATOR	CHECK if Present	DESCRIPTION	COMMENTS
Outfall Damage	☐	☐ Spalling, Cracking or Chipping ☐ Peeling Paint ☐ Corrosion	
Deposits/Stains	☐	☐ Oily ☐ Flow Line ☐ Paint ☐ Other:	
Abnormal Vegetation	☐	☐ Excessive ☐ Inhibited	
Poor pool quality	☐	☐ Odors ☐ Colors ☐ Floatables ☐ Oil Sheen ☐ Suds ☐ Excessive Algae ☐ Other:	
Pipe benthic growth	☐	☐ Brown ☐ Orange ☐ Green ☐ Other:	

Section 6: Overall Outfall Characterization

☐ Unlikely ☐ Potential (presence of two or more indicators) ☐ Suspect (one or more indicators with a severity of 3) ☐ Obvious

Section 7: Data Collection

1. Sample for the lab?	☐ Yes	☐ No	
2. If yes, collected from:	☐ Flow	☐ Pool	
3. Intermittent flow trap set?	☐ Yes	☐ No	If Yes, type: ☐ OBM ☐ Caulk dam

Section 8: Any Non-Illicit Discharge Concerns (e.g., trash or needed infrastructure repairs)?

Lenexa Illicit Discharge Detection and Elimination Program Plan

Lenexa KANSAS	**City of Lenexa** Community Development *Planning Division*
Subject:	Standard Operating Procedures
Illicit Discharge Investigation	Pages: 3
Structural installation inspection procedures	Revision: 3-2-2012

Purpose:

The purpose of this SOP is to provide guidance for a consistent and appropriate investigation and enforcement of municipal code section 4-5-J in adherence with Clean Water Act, National Pollution Discharge Elimination System (NPDES) and guidance from KDHE.

Procedure:

This process begins when a discharge is reported to the City. Discharges may be reported via online service request, phone call or in person. Discharges may also be reported by city staff during routine maintenance and active outfall inspections. An "illicit discharge" includes any release into the municipal separate sewer storm system (MS4) that is not composed entirely of unpolluted stormwater. A "release" is constituted by discharge to waters directly or through the wash off and transport of pollutants found on the land and built surfaces during rain events.

Investigations will be tracked in an Excel spreadsheet until such time that a database can be constructed in Accela to centralize enforcement information with other divisions.

Residential sites

1.	Immediately report ***hazardous materials*** to Lenexa Fire Dept for containment or call Johnson County Hotline 913-715-6969 (6900 after business hours)
2.	Any reported discharge will be investigated within 24 hours of notice to the City.
3.	Enter complainant info into service request module of Accela (or Dale's tracking spreadsheet) Verify site address or approximate location and assign a responsible staff person (Stormwater Technician).
4.	Conduct a site visit and take photos of area whether discharge is visible or not. If discharge is visible, downstream photos will be taken (ex: paint dumped into inlet AND the pipe discharge into the stream)
5.	Contact occupant and advise clean up. If unable to reach anyone, apply a door hanger for residential sites. Several homes may be targeted and addresses are recorded in spreadsheet.
6.	Revisit site within 2 days to verify cleanup or removal of material. Photograph affected area and downstream even if conditions are unchanged. Enter date and conditions into spreadsheet or service request.

7.	Send a courtesy letter to implicated homeowner or group of homes. Template is available.
8.	Conduct follow up inspection within 7 days or following next rain. Photograph conditions on site and downstream. Document any contact from property owner/occupant.
9.	Issue ticket for violation. Contact Angel Whitaker with relevant information and mail ticket to property owner with carbon copy to site address, if applicable.
10.	If court date is scheduled, conduct site visit and photograph both site and downstream to show most recent conditions.
Commercial Sites	
1.	Immediately report ***hazardous materials*** to Lenexa Fire Dept for containment or call Johnson County Hotline 913-715-6969 (6900 after business hours)
2.	Any reported discharge will be investigated within 24 hours of notice to the City.
3.	Enter complainant info into service request module of Accela (or Dale's tracking spreadsheet) Verify site address or approximate location and assign a responsible staff person (Stormwater Technician).
4.	Conduct a site visit and take photos of area whether discharge is visible or not. If discharge is visible, downstream photos will be taken (ex: paint dumped into inlet AND the pipe discharge into the stream)
5.	When discharge occurs off-site of the business (street, stream, job site), record any vehicle information (license plate, make and model of vehicle) and instruct employees to cease discharge. Collect employee name, driver's license number and job title. **CHOICE:** Contact PD to meet on site and issue ticket OR follow up with Community Standards by mailing a ticket to business.
6.	Contact site manager and advise clean up. Notify of code violation and next inspection date.
7.	Revisit site within 2 days to verify cleanup or removal of material. Photograph affected area and downstream even if conditions are unchanged. Enter date and conditions into spreadsheet or service request. **CHOICE:** Contact PD to meet on site and issue ticket OR follow up with Community Standards by mailing a ticket to the business.
8.	Conduct follow up inspection within 7 days or following next rain. Photograph conditions on site and downstream. Document any contact from property owner/occupant.
9.	If court date is scheduled, conduct site visit and photograph both the site and downstream to show most recent conditions.
Staff Involved with Process:	
Customer Service Representative (CSR) Stormwater Technician Stormwater Superintendent Building Inspection Engineering Inspection	

CUSTOMER SERVICE REPRESENTATIVE
Notify Stormwater Technician of resident inquiries and pass along Johnson County Pollution Reporting Hotline number for pollution reporting.
STORMWATER TECHNICIAN:
Primary contact for procedure. Coordinate with all divisions and departments to internally respond to illicit discharge, follow up on issues, track and monitor discharges and document conditions with photos.
STORMWATER SUPERINTENDENT:
Initial contact on any illicit discharges reported by maintenance crews. Direct staff to distribute door hangers, conduct follow up site visits and pass along any acute issues to Stormwater Technician, including any discharge not remediated within 2 days of contact (in person or doorhanger)
BUILDING INSPECTION
Notify Stormwater Technician of any suspicious activity or evident discharge. Cooperate on any open permits to leverage compliance, where applicable.
ENGINEERING INSPECTION
Direct compliance with all contractors, subcontractors and on-site personnel related to public projects. Notify Stormwater Technician of any suspicious activity off-site and take photos if possible.