Illicit Discharge Detection & Elimination Training

Protect & Preserve Your Water Resources

CITY OF DAYTON water

Environmental Management

937.333.3725

Illicit Discharge Detection & Elimination Training
www.youtube.com/watch?v=M60KWC70T-A
National Pollutant Discharge Elimination System (NPDES) Permit

• 5 year permit
• Covers all areas within the corporate boundary of the City of Dayton’s Municipal Separate Storm Sewer System (MS4)
• Only clean rain water is allowed to be discharged to waters of the state
• Effective November 1, 2017 -- Today!
River discharges meet EPA permit & CWA water quality standards.
It all leads to our rivers!
Permit Requirements

- Storm Water Management Plan
- Public Education and Outreach
- Public Involvement/Participation
- Illicit Discharge Program
- Construction Program
- Post Construction/Redevelopment Program
• Pollution Prevention/Good Housekeeping Program
• Industrial and Related Facilities Program
• Monitoring and Reporting
• Annual Report
Illicit Discharge Program

• TRAINING!!!

• Illicit Detection and Tracking Plan
  • Detect something – Call DEM at 333-3725
  • Contact information including the procedure for reporting in all Fleet vehicles

• Enforcement Action Plan
REPORT ALL SPILLS
CALL 3725 4905 (after hours)

Minor Spill
- 5 gallons or less
- Known material of Manageable quantity
  - Contain the spill
  - Cleanup using dry methods
  - Report the spill to the numbers above

Major Spill
- Doesn't qualify as minor spill
- Call 911
- Isolate the area
- Then report the spill to the numbers above
What to Look for...

• Spills and leaks (storage containers)
• Draining hoses
• Other non-liquid discharges
• Grease cleanouts
• Orphan drums/containers
• Illegal dumping (tires, trash, yard waste)
Spills and Leaks
Draining Hoses
Other Non-Liquid Discharges
Grease/Soapy Cleaning Residue
Concrete Washout or Cutting Water
Orphan Drum/Containers
Illegal Dumping
(tires, trash, yard waste)
Dead Animals

• Dayton Delivers
• Call Street Maintenance
  333-4800
## Enforcement Plan

### Table A: Enforcement Response Plan Summary

Violations of the Well Field Protection Program or Storm Water Management Ordinances Resulting from Spills and Illicit Connections (Require Immediate Response)

<table>
<thead>
<tr>
<th>Level</th>
<th>Enforcement Options</th>
<th>Description/Examples</th>
<th>Fee</th>
<th>RP Time to Respond</th>
<th>Cumulative Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Phone call. Site visit-direction to responsible party if DEM is Incident Commander. Warning Letter with deadline.</td>
<td>Illicit connection to storm sewer system. Spill in Source Water Protection Area (SWPA). Spill out of SWPA. Depending on location and product released, DEM may skip Warning Letter and go immediately to Level 2. For illicit connection, Sewer Maintenance Plug may be installed.</td>
<td>N/A</td>
<td>0-1 day</td>
<td>0-1 days</td>
</tr>
<tr>
<td>2</td>
<td>Notice of Violation (NOV) with deadline. DEM Emergency Response Contractor remedies.</td>
<td>Failure to meet deadline of Warning Letter. Failure to follow direction to remediate spill. If required by circumstances, DEM Contractor called.</td>
<td>N/A</td>
<td>0 days-1 week</td>
<td>0 days-8 days</td>
</tr>
<tr>
<td>3</td>
<td>Second NOV citing SWPP or SWM Ordinance. If DEM Contractor, Invoice for Cost of Remediation.</td>
<td>Failure to meet deadline of first NOV. If DEM Contractor needed, recovery of remediation costs. Notice that each day of violation beyond deadline shall be considered a separate violation.</td>
<td>NOV-$500 for SWPP NOV-$1,000 for SWM. If DEM Contractor, remediation costs.</td>
<td>30 days</td>
<td>30-38 days</td>
</tr>
<tr>
<td>4</td>
<td>Third NOV citing SWPP or SWM Ordinance. If DEM Contractor, Invoice for Cost of Remediation.</td>
<td>Failure to meet deadline of second NOV. Each day a violation occurs shall be considered a separate violation. These costs may be charged separate from the abatement costs. For SWPP, notice that violation beyond deadline shall result in termination of water service. Notice that violation beyond deadline may result in civil or criminal action.</td>
<td>NOV - $1,000/day. Fines and or imprisonment, as provided by Law.</td>
<td>30 days</td>
<td>60-68 days</td>
</tr>
<tr>
<td>5</td>
<td>For SWPP, termination of water service.</td>
<td>Failure to meet deadline of third NOV. Termination of water service.</td>
<td>N/A</td>
<td>0 days</td>
<td>60-68 days, the end of the time period of Step 4.</td>
</tr>
<tr>
<td>6</td>
<td>Civil or Criminal Action</td>
<td>Continuing failure to comply or failure to meet third NOV deadline.</td>
<td>Fines, fees, or imprisonment, as provided by law.</td>
<td>0 days</td>
<td>60-68 days, the end of the time period of Step 4.</td>
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<td>Level</td>
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<tr>
<td>1</td>
<td>Phone call, Site visit, Warning Letter or Failure to File RSAIR Letter with deadline</td>
<td>Failure to file RSAIR. Inventory exceeds TMDI. Threat to storm sewer system. Illegal dumping. Lack of Zoning Certificate.</td>
<td>N/A</td>
<td>15-30 days</td>
<td>15-30 days</td>
</tr>
<tr>
<td>2</td>
<td>Notice of Violation (NOV) with deadline</td>
<td>Failure to meet deadline of Warning Letter or Failure to File RSAIR Letter.</td>
<td>N/A</td>
<td>30 days</td>
<td>45-60 days</td>
</tr>
<tr>
<td>3</td>
<td>Second NOV citing SWPP or SWM Ordinance</td>
<td>Failure to meet deadline of first NOV</td>
<td>$500 for SWPP, $1,000 for SWM</td>
<td>30 days</td>
<td>75-90 days</td>
</tr>
<tr>
<td>4</td>
<td>Third NOV citing SWPP or SWM Ordinance</td>
<td>Failure to meet deadline of second NOV. Each day a violation occurs shall be considered a separate violation. These costs may be charged separate from the abatement costs. For SWPP, notice that violation beyond deadline shall result in termination of water service. Notice that violation beyond deadline may result in civil or criminal action.</td>
<td>NOV - $1,000/day. Fines and or imprisonment, as provided by Law.</td>
<td>30 days</td>
<td>105-120 days</td>
</tr>
<tr>
<td>5</td>
<td>For SWPP, termination of water service.</td>
<td>Failure to meet deadline of third NOV. Termination of water service.</td>
<td>N/A</td>
<td>0 days</td>
<td>105-120 days, the end of the time period of Step 4</td>
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https://www.youtube.com/watch?v=GL7weEuX4Y8
Time for the QUIZ

• What did you learn?

• Use your phone to text in the answer!
  • Send texts to: 22333
  • First message should be: KATIENORRIS643