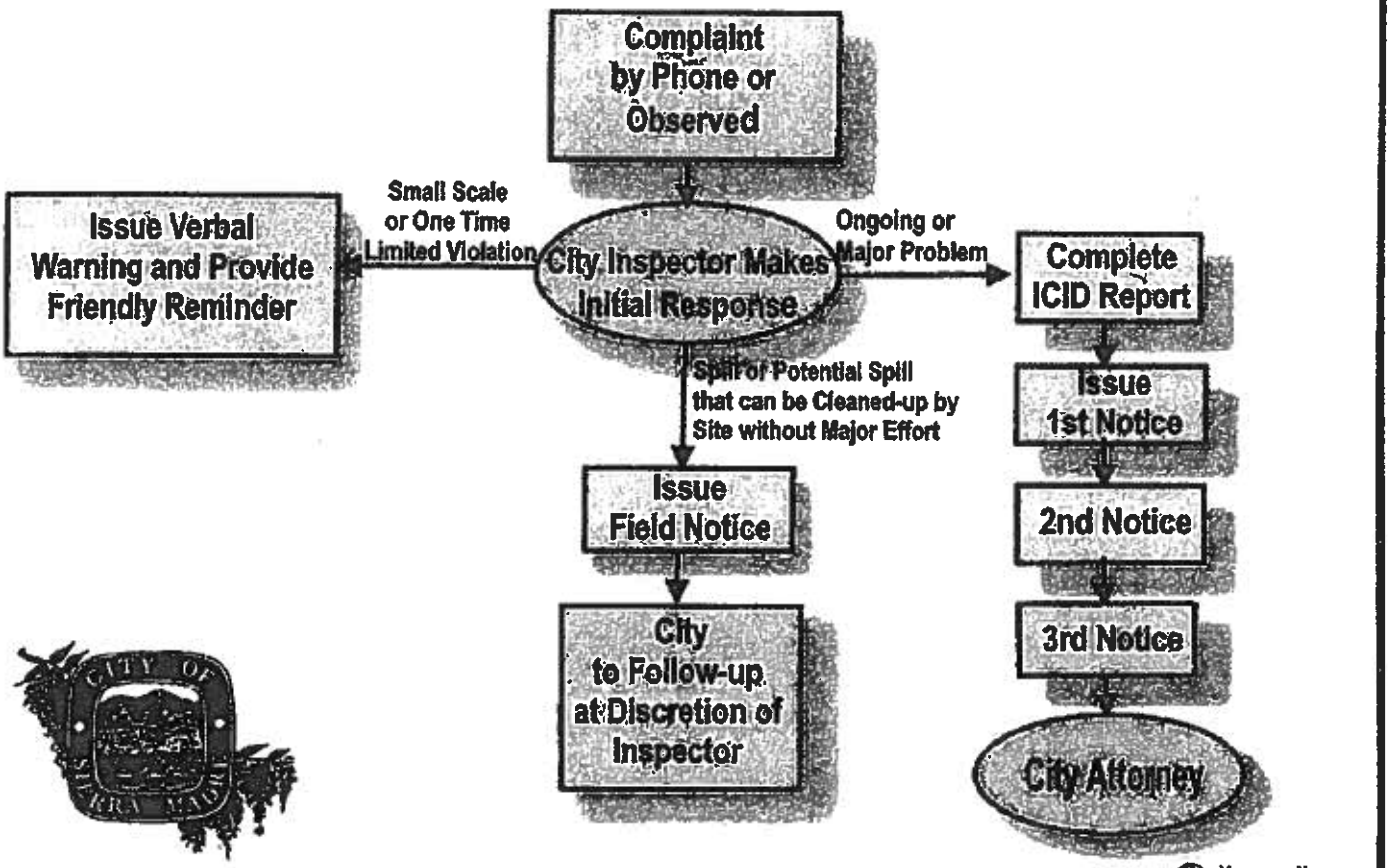
ATTACHMENT D

CITY OF SIERRA MADRE
NPDES-ICID ENFORCEMENT SUMMARY



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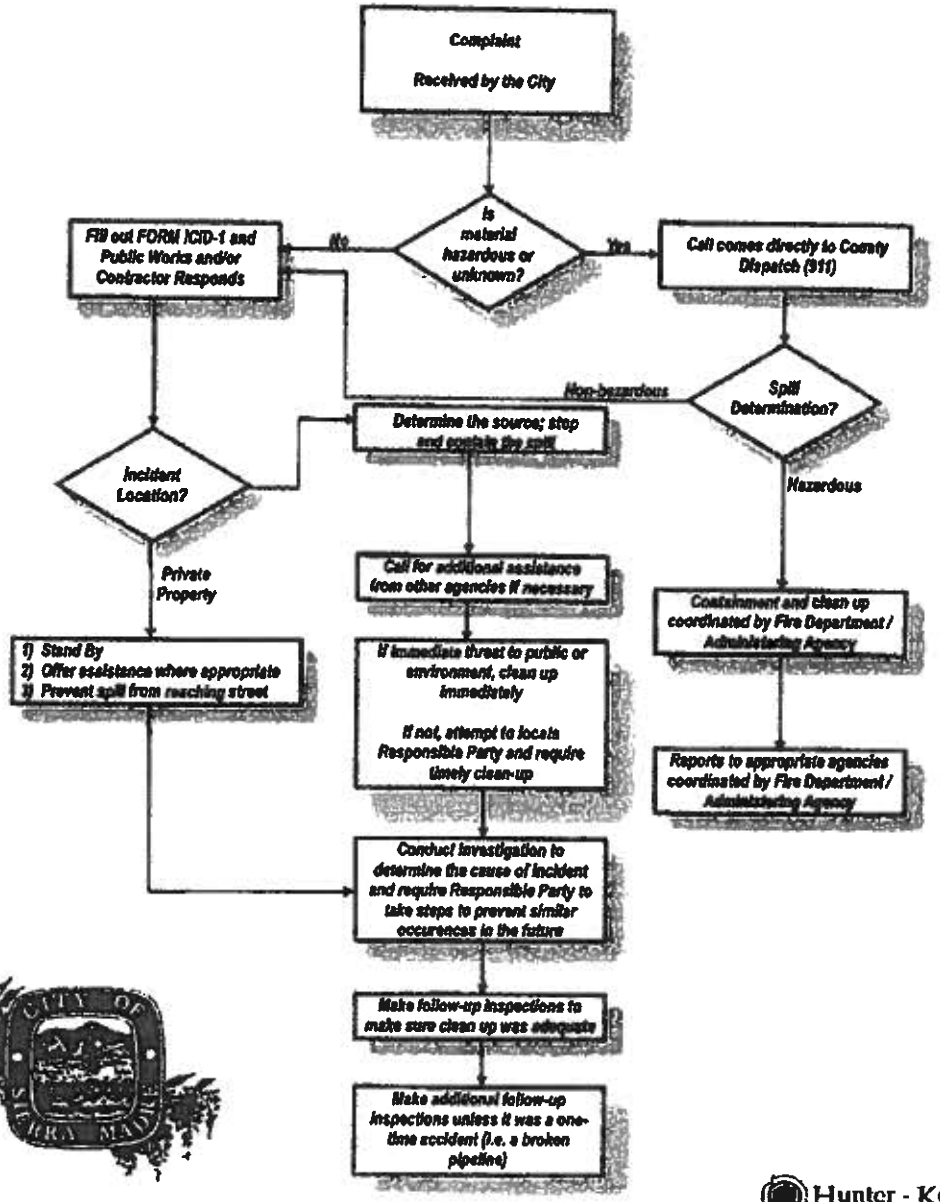
SPILL INVESTIGATION, CONTAINMENT, AND CLEANUP GUIDELINES



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ILLICIT CONNECTION/ILLICIT DISCHARGE RESPONSE PROCEDURES

General Response Procedures

An illicit discharge response entails four fundamental phases, which are: **CLASSIFY, CONTAIN, CONTROL and CLEANUP.**

The first personnel on scene are to **classify** whether the discharge is hazardous, non-hazardous, or unknown **(Do not touch or approach any potentially hazardous material).** Hazardous and unknown discharges are referred to the City's Fire Department and/or the City's environmental cleanup contractor. Non-hazardous discharges are handled by City personnel, with the assistance of the City's environmental consultant.

The second phase is to **contain** the spill. For some forms of liquid discharges, this may entail the use of sand or soil dikes, sand bags, or plugging the outlet pipe of a catch basin. For other types of spills this may simply entail closing the roadway to prevent material from being tracked or otherwise dispersed by vehicular traffic.

The third phase of the response is to bring the discharge under **control.** For sewer spills this means clearing the line blockage or bypassing the line. For other types of discharges, this may entail sanding or placing absorbent on a material, or simply instructing someone on private property to stop their discharge.

The fourth and final step of the response is **clean up.** For liquid spills this may require washing down and disinfecting all surfaces touched by the spill, and removing and properly disposing of all contaminated wash down. Other types of discharges will have their own unique methods of cleanup.

Initial Discharge Response Procedures

1. The Public Works Director or designee thereof shall be immediately dispatched to the site.

2. If the discharge may be hazardous or unknown, proceed to Step 3. If the discharge is determined to be non-hazardous, proceed to Step 5.

4. The Public Works Director or designee thereof will then notify the Sierra Madre Fire Department of the incident. Upon receiving confirmation that the Fire Department will be responding, the Public Works Director or designee thereof is to stand-by and await the Fire Department's arrival to provide any assistance that may reasonably be requested.

5. If the spill is determined to be non-hazardous, proceed with containment, control and cleanup operations consistent with the procedures specified within the Sewage Spill Response and Streets and Road Maintenance sections of the Public Agency manual and the following flowchart.

ILLICIT CONNECTION/ILLICIT DISCHARGE REPORTING PROCEDURES

Working Hours Reporting Procedures

1. Suspected illicit connections/illicit discharges are to be reported through the City's Hotline Number (626) 355-7135

2. Personnel receiving the call shall complete an Illicit Connection/Illicit Discharge Program Reporting and Response Form (Form ICID-1) and shall immediately contact the NPDES Coordinator for initial response.

3. After determining whether the situation entails hazardous, non-hazardous or unknown material(s), and taking all reasonable action immediately necessary for his/her own safety and the safety of the general public, the Public Works Director or designee thereof will report back to the personnel that received the original call to advise them of the nature of the problem.

4. The person that received the original call shall record the information provided by the Public Works Director or designee thereof onto Form ICID-1 and shall then forward the form to the Director of Public Works for review.

5. In all cases, a copy of the completed Form ICID-1 shall be forwarded to the City's environmental consultant for follow-up investigation and enforcement.

(The existing Hazmat reporting form may be used in lieu of an ICID-1 form)

After Hours Reporting Procedures

1. Suspected illicit connections/illicit discharges are received either through the Police Department's 911 Dispatch, or through calls made to the Police Department's Complaint Desk (626) 355-1414 or to the City's Hotline number, (626) 355-7135

2. Police Dispatch will dispatch a unit to perform an initial response and to determine:

3. Incidents involving hazardous or unknown materials will result in County Fire/Hazmat units being responded to the location. In addition, the Police Department's Watch Commander shall notify the Director of Public Works that a Hazmat incident has occurred. This notification may be made on the next working day.

4. Upon receiving notification that a Hazmat incident occurred, the Director of Public Works shall be responsible for obtaining all available information related to the incident from County Fire/Hazmat and for forwarding the same to the City's environmental consultant for follow-up investigation and enforcement.

5. Incidents involving non-hazardous materials will be referred to City personnel, as follows:

   a. If immediate action is needed, Public Works Department standby personnel will be contacted by Police Dispatch using the City's Emergency Call List. The staff person contacted is responsible for filing a completed Form ICID-1 in this event.

   b. If immediate action is not needed, Police Dispatch will contact the City's Hotline on the next working day.

6. City response procedures to either method of notification shall be consistent with the procedures contained within this manual.

ILLICIT CONNECTION/ILLICIT DISCHARGE ENFORCEMENT PROCEDURES

Limited Violation

1. This would be defined as a small-scale, one-time violation of a limited scale. Examples would be:

   a. A resident sweeping grass and leaves into the street

   b. A contractor working on a residential property leaving dirt piles uncovered with impending rain.

2. Issue a verbal warning, provide a "friendly reminder," and ensure that the matter is corrected.

3. Complete a Form ICID-1 and submit the completed form to the Director of Public Works for forwarding to the City's environmental consultant for inclusion in routine summary reports.

4. If a violation occurs in a residential area, a "blanket mailer" may be sent to suspected source(s) and neighboring addresses as additional education.

Notable Violation

1. This would be defined as a connection or discharge that could be eliminated by the responsible party without major effort. Examples would be:

   a. A contractor not utilizing the appropriate Best Management Practices (BMPs) for work being performed.

   b. A business improperly storing materials where they will be exposed to rainfall.

2. Issue a Field Notice to the responsible party and establish a reasonable time period for compliance.

3. A copy of the Field Notice is forwarded to the City's environmental consultant for follow-up investigation and assurance that the matter has

Major Violation

1. This would be defined as a connection or discharge which has not or could not be eliminated by the responsible party, which may have required the emergency or priority response of City or County forces, or is an on-going problem. Examples of this would be:

   a. Major material discharges within the public right-of-way.

   b. Illegal connections to the storm drain system (i.e. street, catch basin, or discharge to the beach or ocean).

   c. Storage of material in such a manner that rainfall could wash pollutants into the street and storm drain system.

2. City response personnel complete Form ICID-1 and forward the same to the City's environmental consultant.

3. The City's environmental consultant conducts a site investigation and issues a First Notice of Violation and prescribes corrective action to be taken and a reasonable time period for compliance.

4. If necessary, the consultant issues Second and Third notices. The Third Notice includes an admonishment that failure to comply will result in legal action being taken.

5. If necessary, the consultant transmits a Case File, which shall include copies of all reports, investigations and letters to the Director of Public Works.

6. The Director of Public Works forwards the Case File to the City Prosecutor for legal remedy.

7. For serious violations, the Director of Public Works at his/her sole discretion, may authorize proceeding directly from Step 2 to Step 6.

COMPLAINT INVESTIGATION WORKSHEET

Inspector	Example
Investigation Number	73
Investigation Date	10/22/2001

COMPLAINT INFORMATION

Describe the Complaint:

Location Complaint Is Occurring	Complaint Information
Date observed:	Date complaint received:
Site Contact Name:	Complaint received via:
Business Name:	Name of complainant:
Type of Business:	Complainant business:
Site address:	Complainant address:
Site Phone:	Complainant Phone:

Investigation Background

Contact Information:

Investigation Report:

ILLICIT DISCHARGE/CONNECTION PROGRAM

FORM ICID 1

REPORTING AND RESPONSE FORM

_____

REPORTING INFORMATION

DATE AND TIME: _____

REPORTED BY: _____

PHONE NUMBER: _____

ADDRESS: _____

COMMENTS: _____

SITE INFORMATION

LOCATION OF DISCHARGE: _____

TYPE OF MATERIAL: ☐ OIL / GREASE ☐ SEDIMENT ☐ HAZARDOUS ☐ UNKNOWN ☐ WASTEWATER ☐ OTHER: _____

ESTIMATED QUANTITY: _____ GALLONS / POUNDS (CIRCLE ONE)

LAND USE: ☐ RESIDENTIAL ☐ INDUSTRIAL ☐ COMMERCIAL ☐ PUBLIC

RESPONSE INFORMATION

PERSONNEL/TIME/DATE: _____

OBSERVATIONS: _____

FOLLOW UP INFORMATION

REFFERED TO: ☐ John L. Hunter & Associates, Inc. ☐ Health/HazMat ☐ Police Department ☐ Fire Department ☐ Other: _____

COMMENTS: _____

ILLICIT DISCHARGE/CONNECTION PROGRAM

FORM ICID 1

REPORTING AND RESPONSE FORM

_____

REPORTING INFORMATION

DATE AND TIME: _____

REPORTED BY: _____

PHONE NUMBER: _____

ADDRESS: _____

COMMENTS: _____

SITE INFORMATION

LOCATION OF DISCHARGE: _____

TYPE OF MATERIAL: ☐ OIL / GREASE ☐ SEDIMENT ☐ HAZARDOUS ☐ UNKNOWN ☐ WASTEWATER ☐ OTHER: _____

ESTIMATED QUANTITY: _____ GALLONS / POUNDS (CIRCLE ONE)

LAND USE: ☐ RESIDENTIAL ☐ INDUSTRIAL ☐ COMMERCIAL ☐ PUBLIC

RESPONSE INFORMATION

PERSONNEL/TIME/DATE: _____

OBSERVATIONS: _____

FOLLOW UP INFORMATION

REFFERED TO: ☐ John L. Hunter & Associates, Inc. ☐ Health/HazMat ☐ Police Department ☐ Fire Department ☐ Other: _____

COMMENTS: _____