



**City of Yuma Illicit Discharge Detection
and Elimination Program (IDDE)
for Compliance with the AZPDES MS4 Permit**

June 21, 2018

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Introduction:

The City of Yuma recognizes the potential for illicit discharges to its MS4 and is committed to addressing this concern. The BMPs are targeted toward known and potential illicit discharges. The Yuma City Code contains many references to garbage, refuse, and nuisances, but no disposal ordinances are specific to the City's MS4.

Program Elements:

The City has implemented this Illicit Discharge Detection and Elimination Program (IDDE Program) to systematically find and eliminate sources of non-stormwater to its MS4. Procedures of the IDDE program will be implemented to prevent illicit connections and discharges to the MS4. As a minimum this program will include the following elements:

1. **Visual Dry Weather Monitoring:** The dry weather monitoring inspection program inspects all outfalls at least once annually. This monitoring is conducted at least 72 hours after a storm event that resulted in a discharge from the MS4. Table at the end of this document provides documentation and findings of dry weather monitoring in the annual report.
2. **Visual Stormwater Discharge Monitoring:** The City has five stormwater outfalls at the Colorado River; Madison Ave outfall, 9th Ave outfall, 17th Ave outfall, 19th Ave outfall and Pacific Ave outfall. These outfalls are representative of stormwater discharges from the City's MS4 to conduct visual stormwater discharges. Visual monitoring will be performed at each outfall twice during each wet season per Section 6.4.3.8(b) and in accordance with the Analytical Monitoring Program (AMP).
3. The City will follow its Enforcement Response Plan (ERP) to schedule follow-up monitoring to identify suspected illicit discharges to ensure that they do not recur.

Program Evaluation:

The City will utilize the ERP and the protocol of annual SWMP evaluation per Section 5.1.h to evaluate indicators of functionality of this program and track its success. Indicators of program success are outlined in this IDDE program detailing actions required to locate and remove illicit discharges.

Because of the annual influx of winter visitors, the City has experienced issues with improper disposal of sewage from recreational vehicles (RVs). The City also has experienced illegal dumping of other materials, such as used oil and grease, in some areas of the City.

For purposes of permit compliance, the City has developed and implemented an ordinance, with enforcement strategies, that has prohibited the discharge of non-stormwater substances into the public drainage system and identified incidental non-stormwater discharges that are allowable.

Detection Methods:

The City is utilizing the following detection methods:

1. Dry weather monitoring of outfalls
2. Wet weather monitoring of outfalls
3. A complaint hotline (928-373-4520) and email (storm@yumaaz.gov) to receive reports from the public to detect illicit discharges.
4. During their field inspections, Public Works crews and Community Development building Inspectors will report any illicit discharge or illegal dumping to the MS4. (Opportunistic Inspections).
5. The City keeps registers to document its dry-weather monitoring program, hotline complaints, complaints received at storm@yumaaz.gov and complaints reported by staff. The City also has an investigation system for tracing illicit discharges and illegal dumping with full coordination of Code Enforcement staff in Public Works and Community Development Departments. If required, the City will send samples of any non-stormwater substance detected in its MS4 to a State-approved laboratory for testing.

Allowable non-Stormwater Discharges:

Through the public education minimum control measure, the City will educate the public and City employees on the hazards of illegal discharges and dumping in the drainage system. The City considers the following discharges, which are listed in Part I, Section C.2. of the AZPDES Small MS4 General Permit to be allowable non-stormwater discharges:

1. Water line flushing,
2. Landscape irrigation,
3. Diverted stream flows,
4. Rising ground water,
5. Uncontaminated ground water infiltration,
6. Uncontaminated pumped ground water,
7. Discharges from potable water sources,
8. Foundation drains,
9. Air conditioning condensate,
10. Irrigation water,
11. Springs,

12. Water from crawl space pumps,
13. Footing drains,
14. Lawn watering,
15. Individual residential car washing,
16. Discharges from riparian habitats and wetlands
17. De-chlorinated swimming pool discharges
18. Street wash water, and
19. Discharges or flows from emergency firefighting activities.

Unpermitted Discharges to the MS4:

The City of Yuma developed this program as part of the IDDE Program to actively identify industrial facilities and activities that discharge to the MS4 without current MSGP permit coverage.

This program starts by targeting the Priority Area (P.A.) as identified in the Analytical Monitoring Plan (AMP). The P.A. is the area in the City of Yuma with drainage connection to the Colorado River (River). The River has been designated since 2008 as impaired for low dissolved oxygen and selenium. The City will utilize its business list to develop this list.

This program includes the following:

1. Number of facilities contacted each year in the annual report
2. Facility name and location
3. Type of activity and SIC code to the extent know
4. Proof of MSGP coverage
5. Connection to the MS4
6. Affected stormwater outfall
7. City of Yuma Pretreatment Information
8. City of Yuma Staff involved

Staff Training:

The City provides annual training for all staff involved in identifying, reporting and mitigating illicit discharges to the City's MS4 system. Staff involved in the IDDE program who receive this annual training includes, but is not limited to, Public Works staff, Building Safety Inspectors, Engineering Inspectors and Utilities staff. Frequency and type of employee training is reported in the annual report.

Responsible Departments and Personnel:

Responsible Departments: Department of Public Works and Engineering Department

Responsible Positions: Joel Olea, Director of Public Works & David Wostenberg, City Engineer

Standard Operating Procedure (SOP):

This SOP describes the procedures that can be used to support Chapter 194 of Yuma City Code “Illicit Discharge Detection and Elimination (IDDE)”. The IDDE program is intended to protect the City Municipal Separate Storm Sewer System (MS4) from illicit discharges and illegal dumping. This SOP offers the below steps to identify, locate and eliminate or reduce the illicit discharge and dumping into the City MS4. This SOP will be revised with the SWMP as necessary. The City is implementing the following steps:

1. Locate important areas and locations likely to have illicit discharges with proximity to the City MS4 and surface waters. The following will be classified as priority areas:
 - A. All stormwater outfalls at the Colorado River. This area includes all drainage areas that contribute to outfalls at the River. Use of previous drainage studies and land use will be utilized to better identify drainage areas.
 - B. Commercial and industrial facilities north of 8th Street, east of Avenue B and west of Main Street including but not limited to areas of public assemblies such as parks, hotels, churches, movie theaters etc.
 - C. Shopping malls, educational facilities, exposed areas with proximity to Colorado River or with potential of discharging into the River.
 - D. Areas within 2.5 miles of the Colorado River.
 - E. Areas with historical or previous citizen complaints of dumping and littering; and
 - F. As designated by the Director of Public Works.
2. Perform annual inspections of all stormwater outfalls at the surface waters per the Dry Weather Outfall Inspection Form.
3. Perform selenium and sediment monitoring per approved Analytical Monitoring Program, for any illicit discharge incident or during dry weather monitoring at outfalls at the Colorado River.
4. All important areas mentioned above have been included in the current stormwater map/atlas.
5. Review and consider information collected when illicit discharge was initially identified in a previous incident or dry weather inspection.

6. Use visual inspections of upstream points as a second step (first step is the dry weather monitoring inspection) and document all results for future references.
7. Review procedures to remove the source of an illicit discharge.
8. Refer potential septic system failures to the local health office for enforcement.
9. Suspend public access to storm drain if threats to public health or serious physical harm to the public or the environment are possible.
10. Perform opportunistic inspections by Public Works and Utilities staff crews while they are conducting their duties in and around the stormwater collection system. Staff is encouraged to contact dispatcher, supervisor, or code enforcement if they see evidence of an illicit discharge or illegal dumping into the storm drain.
11. Perform inspections by Building Safety staff, take photos and send email to storm@yumaaz.gov documenting the case. This email is monitored by the Engineering Inspection Supervisor, with backup monitoring by the Development Engineering Manager and City Engineer.
12. Hotline at 928-373-4520 (Engineering front desk) is available to receive reports of illicit discharges and illegal dumping into the MS4.
13. When a complaint is received it is dispatched to Engineering Inspections or the Engineering Development Manager. Engineering staff will contact the appropriate City staff for follow-up until the case is resolved per the Enforcement Response Plan. Engineering will document the case per table in Appendix E.
14. Evaluate the IDDE program effectiveness and update the SWMP, as needed.
15. Plan, coordinate and perform a campaign to clean the Priority Area with City and public participation.

Enforcement Response Plan (ERP):

The City of Yuma Enforcement Response Plan is a stand-alone document that can be located on the City of Yuma website at <http://www.yumaaz.gov/city-engineering/engineering-documents--references-.html>

List of Industrial Unpermitted Discharges to the MS4 Priority Area

Number	Facility Name and Location	Type of Industrial Activity-SIC Code	MSGP Approval Number	Connection to COY System	MS4 Component and Outfall	City Staff
1	Agricultural chemicals facilities	2873				
2	Local and Highway Passenger Transportation facilities	4111				
3	Asphalt paving and roofing facilities	2951				
4	Scrap Recycling Facilities	5093				
5	Printing and Publishing Facilities	2711				
6	Automobile salvage yards	5015				
7	Hazard waste Facilities	HZ				