

Illicit Discharge Detection and Elimination Program Plan

**City of Lenexa, Kansas
Public Works Department
Watershed Division**

**Revised
October 2007**

Table of Contents

Section I Regulatory Background

Section II Illicit Discharge Ordinance

Section III Program Contact Information and Staff Responsibilities

Section IV Public Outreach and Staff Training

Section V Illicit Discharge Detection

Section VI Pollution Investigations

Section VII Illicit Discharge Elimination

Attachment I Ordinance #4884: Illicit Discharges to Storm Sewers and Surface Waters

Attachment II Storm Sewer Outfall Maps

Attachment III Outfall Reconnaissance Inventory Forms

Section I 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.

Section II 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. 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. 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.

Section III Program Contact Information and Staff Responsibilities

Rob Beilfuss, Watershed Water Quality Specialist, is the primary point of contact for Lenexa's IDDE Program. Mr. Beilfuss can be reached at 913-477-7666 (office), 913-238-1396 (cell phone), or emailed at rbeilfuss@ci.lenexa.ks.us.

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://illicitdischarge.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 Investigations	Discharge Elimination	Compliance Enforcement
Rob Beilfuss	Watershed Water Quality Specialist	✓	✓	✓	✓
Dale Clark	Erosion and Sediment Control Inspector		✓	✓	
Kevin Bing	Watershed Grey Crew Foreman			✓	
Scott Colby	Watershed Grey Crew Maintenance Worker II		✓	✓	
Suzi Johnston	Code Enforcement Officer		✓		✓

Section IV 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://illicitdischarge.jocogov.org/>.

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

Section V 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 Watershed Grey 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 Grey 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 GBA Master 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 Water Quality Specialist whenever an illicit discharge is reported for Lenexa.

Section VI Pollution Investigations

The Water Quality Specialist 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 Water Quality Specialist will coordinate with the Watershed Grey 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.

Section VII Illicit Discharge Elimination

After an illicit discharge has been detected and traced to the source, the Water Quality Specialist will work with the responsible party to abate the discharge and initiate remedial activities. 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 and remediate any impacted storm sewer infrastructure and receiving water way.

Compliance and enforcement activities will be coordinated with City Planning and Codes staff. If needed, Police Department support will be used to address indirect discharges in public places (i.e. parking lots, streets, alleys, etc.).

Attachment I

Attachment II

Attachment III