



Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize
- Product Substitution

Description

Non-stormwater discharges are those flows that do not consist entirely of stormwater. Some non-stormwater discharges do not include pollutants and may be discharged to the storm drain. These include uncontaminated groundwater and natural springs. There are also some non-stormwater discharges that typically do not contain pollutants and may be discharged to the storm drain with conditions. These include car washing, air conditioner condensate, etc. However there are certain non-stormwater discharges that pose environmental concern. These discharges may originate from illegal dumping or from internal floor drains, appliances, industrial processes, sinks, and toilets that are connected to the nearby storm drainage system. These discharges (which may include: process waste waters, cooling waters, wash waters, and sanitary wastewater) can carry substances such as paint, oil, fuel and other automotive fluids, chemicals and other pollutants into storm drains. They can generally be detected through a combination of detection and elimination. The ultimate goal is to effectively eliminate non-stormwater discharges to the stormwater drainage system through implementation of measures to detect, correct, and enforce against illicit connections and illegal discharges of pollutants on streets and into the storm drain system and creeks.

Approach

Initially the industry must make an assessment of non-stormwater discharges to determine which types must be eliminated or addressed through BMPs. The focus of the following approach is in the elimination of non-stormwater discharges.

Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	✓
Oil and Grease	✓
Organics	✓



Pollution Prevention

- Ensure that used oil, used antifreeze, and hazardous chemical recycling programs are being implemented. Encourage litter control.

Suggested Protocols

Recommended Complaint Investigation Equipment

- Field Screening Analysis
 - pH paper or meter
 - Commercial stormwater pollutant screening kit that can detect for reactive phosphorus, nitrate nitrogen, ammonium nitrogen, specific conductance, and turbidity
 - Sample jars
 - Sample collection pole
 - A tool to remove access hole covers
- Laboratory Analysis
 - Sample cooler
 - Ice
 - Sample jars and labels
 - Chain of custody forms
- Documentation
 - Camera
 - Notebook
 - Pens
 - Notice of Violation forms
 - Educational materials

General

- Develop clear protocols and lines of communication for effectively prohibiting non-stormwater discharges, especially those that are not classified as hazardous. These are often not responded to as effectively as they need to be.
- Stencil or demarcate storm drains, where applicable, to prevent illegal disposal of pollutants. Storm drain inlets should have messages such as “Dump No Waste Drains to Stream” stenciled or demarcated next to them to warn against ignorant or intentional dumping of pollutants into the storm drainage system.

- See SC44 Stormwater Drainage System Maintenance for additional information.

Illicit Connections

- Locate discharges from the industrial storm drainage system to the municipal storm drain system through review of “as-built” piping schematics.
- Isolate problem areas and plug illicit discharge points.
- Locate and evaluate all discharges to the industrial storm drain system.

Visual Inspection and Inventory

- Inventory and inspect each discharge point during dry weather.
- Keep in mind that drainage from a storm event can continue for a day or two following the end of a storm and groundwater may infiltrate the underground stormwater collection system. Also, non-stormwater discharges are often intermittent and may require periodic inspections.

Review Infield Piping

- A review of the “as-built” piping schematic is a way to determine if there are any connections to the stormwater collection system.
- Inspect the path of floor drains in older buildings.

Smoke Testing

- Smoke testing of wastewater and stormwater collection systems is used to detect connections between the two systems.
- During dry weather the stormwater collection system is filled with smoke and then traced to sources. The appearance of smoke at the base of a toilet indicates that there may be a connection between the sanitary and the stormwater system.

Dye Testing

- A dye test can be performed by simply releasing a dye into either your sanitary or process wastewater system and examining the discharge points from the stormwater collection system for discoloration.

TV Inspection of Drainage System

- TV Cameras can be employed to visually identify illicit connections to the industrial storm drainage system.

Illegal Dumping

- Regularly inspect and clean up hot spots and other storm drainage areas where illegal dumping and disposal occurs.
- On paved surfaces, clean up spills with as little water as possible. Use a rag for small spills, a damp mop for general cleanup, and absorbent material for larger spills. If the spilled material is hazardous, then the used cleanup materials are also hazardous and must be sent to a certified laundry (rags) or disposed of as hazardous waste.

- Never hose down or bury dry material spills. Sweep up the material and dispose of properly.
- Use adsorbent materials on small spills rather than hosing down the spill. Remove the adsorbent materials promptly and dispose of properly.
- For larger spills, a private spill cleanup company or Hazmat team may be necessary.

Once a site has been cleaned:

- Post “No Dumping” signs with a phone number for reporting dumping and disposal.
- Landscaping and beautification efforts of hot spots may also discourage future dumping, as well as provide open space and increase property values.
- Lighting or barriers may also be needed to discourage future dumping.
- See fact sheet SC11 Spill Prevention, Control, and Cleanup.

Inspection

- Regularly inspect and clean up hot spots and other storm drainage areas where illegal dumping and disposal occurs.
- Conduct field investigations of the industrial storm drain system for potential sources of non-stormwater discharges.
- Pro-actively conduct investigations of high priority areas. Based on historical data, prioritize specific geographic areas and/or incident type for pro-active investigations.

Reporting

- A database is useful for defining and tracking the magnitude and location of the problem.
- Report prohibited non-stormwater discharges observed during the course of normal daily activities so they can be investigated, contained, and cleaned up or eliminated.
- Document that non-stormwater discharges have been eliminated by recording tests performed, methods used, dates of testing, and any on-site drainage points observed.
- Document and report annually the results of the program.
- Maintain documentation of illicit connection and illegal dumping incidents, including significant conditionally exempt discharges that are not properly managed.

Training

- Training of technical staff in identifying and documenting illegal dumping incidents is required.
- Consider posting the quick reference table near storm drains to reinforce training.
- Train employees to identify non-stormwater discharges and report discharges to the appropriate departments.

- Educate employees about spill prevention and cleanup.
- Well-trained employees can reduce human errors that lead to accidental releases or spills. The employee should have the tools and knowledge to immediately begin cleaning up a spill should one occur. Employees should be familiar with the Spill Prevention Control and Countermeasure Plan.
- Determine and implement appropriate outreach efforts to reduce non-permissible non-stormwater discharges.
- Conduct spill response drills annually (if no events occurred to evaluate your plan) in cooperation with other industries.
- When a responsible party is identified, educate the party on the impacts of his or her actions.

Spill Response and Prevention

- See SC11 Spill Prevention Control and Cleanup.

Other Considerations

- Many facilities do not have accurate, up-to-date schematic drawings.

Requirements

Costs (including capital and operation & maintenance)

- The primary cost is for staff time and depends on how aggressively a program is implemented.
- Cost for containment and disposal is borne by the discharger.
- Illicit connections can be difficult to locate especially if there is groundwater infiltration.
- Indoor floor drains may require re-plumbing if cross-connections to storm drains are detected.

Maintenance (including administrative and staffing)

- Illegal dumping and illicit connection violations requires technical staff to detect and investigate them.

Supplemental Information

Further Detail of the BMP

Illegal Dumping

- Substances illegally dumped on streets and into the storm drain systems and creeks include paints, used oil and other automotive fluids, construction debris, chemicals, fresh concrete, leaves, grass clippings, and pet wastes. All of these wastes cause stormwater and receiving water quality problems as well as clog the storm drain system itself.
- Establish a system for tracking incidents. The system should be designed to identify the following:
 - Illegal dumping hot spots

- Types and quantities (in some cases) of wastes
- Patterns in time of occurrence (time of day/night, month, or year)
- Mode of dumping (abandoned containers, “midnight dumping” from moving vehicles, direct dumping of materials, accidents/spills)
- Responsible parties

One of the keys to success of reducing or eliminating illegal dumping is increasing the number of people at the facility who are aware of the problem and who have the tools to at least identify the incident, if not correct it. Therefore, train field staff to recognize and report the incidents.

What constitutes a “non-stormwater” discharge?

- Non-stormwater discharges to the stormwater collection system may include any water used directly in the manufacturing process (process wastewater), air conditioning condensate and coolant, non-contact cooling water, cooling equipment condensate, outdoor secondary containment water, vehicle and equipment wash water, sink and drinking fountain wastewater, sanitary wastes, or other wastewaters.

Permit Requirements

- Facilities subject to stormwater permit requirements must include a certification that the stormwater collection system has been tested or evaluated for the presence of non-stormwater discharges. The State’s General Industrial Stormwater Permit requires that non-stormwater discharges be eliminated prior to implementation of the facility’s SWPPP.

Performance Evaluation

- Review annually internal investigation results; assess whether goals were met and what changes or improvements are necessary.
- Obtain feedback from personnel assigned to respond to, or inspect for, illicit connections and illegal dumping incidents.

References and Resources

California’s Nonpoint Source Program Plan <http://www.swrcb.ca.gov/nps/index.html>

Clark County Storm Water Pollution Control Manual
<http://www.co.clark.wa.us/pubworks/bmpman.pdf>

King County Storm Water Pollution Control Manual <http://dnr.metrokc.gov/wlr/dss/spcm.htm>

Santa Clara Valley Urban Runoff Pollution Prevention Program <http://www.scvurppp.org>

The Storm Water Managers Resource Center <http://www.stormwatercenter.net/>