IDD&E

Section 4.2.4

Illicit Discharge Inspections

IDDE Illicit Field Training Guidance Elements Checklist: Illicit Connection Field Screening

Ecology staff prepared the following IDDE Field Training Guidance Elements Checklist to provide permittees and trainers with a broad outline of recommended elements for an Illicit Discharge Detection and Elimination training program for field staff. While not an exhaustive list of permit requirements or training elements, the guidance checklist can be used by permittees to measure the quality of IDDE field training that they are providing to their field staff.

1. Determine Priority Outfalls
    a. Evaluating land uses
    b. Records of complaints
    c. Areas with spill potential
    d. Public resources at outfall and downstream (salmon habitat, shellfish recreation, e.g.)
2. Preparing for a Field Visit
    a. Preliminary documentation research (maps, etc.)
    b. Necessary equipment preparation
    c. Appropriate notifications (lab, other jurisdictions, residents)
    d. Tool: Field visit inventory/checklist (standardized)
3. Recon/Access – Safety Considerations
    a. Confined space entry policy
    b. Local code for right of access/entry
    c. Field safety
4. Dry Weather Recon/Visual Field Inspections
    a. Visual Observations of Outfalls/Water Bodies
    b. Illicit Connections Screening/Water Quality Sampling in accordance with the Center for Watershed Protection Guidance or another methodology of comparable effectiveness.
5. Characterizing the Nature of the Discharge
    a. Identifying common/likely discharges
    b. Reviewing lab/field test results
    c. Evaluating whether the discharge must be immediately contained and appropriate steps taken.
    d. What to do if you discover hazardous materials Internal coordination (e.g., with fire, police, public works)
6. Tracing the Source of the Discharge
    a. Consulting the map/tracing system
    b. Equipment inventory
    c. Methods (cameras, dye test, smoke test, popping CB/MH covers)
    d. Documentation
7. Procedures for Reporting the Illicit Connection/Discharge (subject to local code)
    a. Timelines for action (permit)
    b. ECY Reporting Discharges and Spills Guidance

c. Notification
    i. Authorities
    ii. Property owner
    iii. Downstream jurisdiction with interconnected MS4

8. Procedures for Removing the Illicit Connection/Discharge (subject to local code)
    a. Timelines for action (permit)
    b. Notification
        i. Authorities
        ii. Property owner
    c. Escalating enforcement procedures/policies/tools
    d. Follow-up inspection

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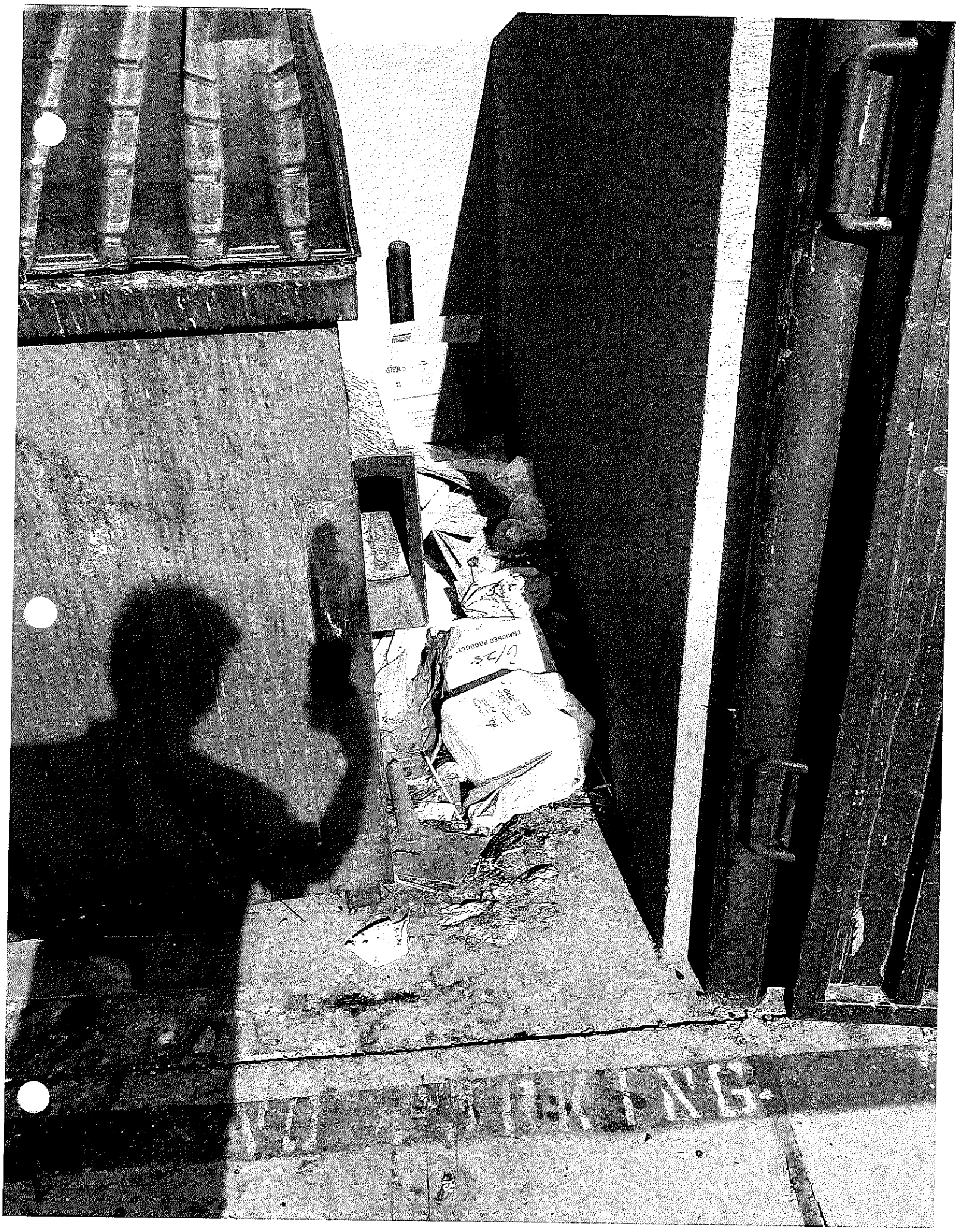

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