ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM (IDDE)

IDDE BACKGROUND (40 CFR PART 122.34)

LOCAL GOVERNMENTS must develop, implement and enforce a program to detect and eliminate illicit discharges (as defined at Sec. 122.26(b)(2)).

LOCAL GOVERNMENTS must develop a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;

LOCAL GOVERNMENTS must, to the extent allowable under State, Tribal or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-storm water discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

LOCAL GOVERNMENTS must develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, to your system; and

LOCAL GOVERNMENTS must inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

LOCAL GOVERNMENTS need address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if you identify them as significant contributors of pollutants to your small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water (discharges or flows from fire fighting activities are excluded from the effective prohibition against non-storm water and need only be addressed where they are identified as significant sources of pollutants to waters of the United States).
EPA recommends that the plan to detect and address illicit discharges include the following four components: procedures for locating priority areas likely to have illicit discharges; procedures for tracing the source of an illicit discharge; procedures for removing the source of the discharge; and procedures for program evaluation and assessment. EPA recommends visually screening outfalls during dry weather and conducting field tests of selected pollutants as part of the procedures for locating priority areas. Illicit discharge education actions may include storm drain stenciling, a program to promote, publicize, and facilitate public reporting of illicit connections or discharges, and distribution of outreach materials.

Note for each question answer Yes or No, and enter a comment and/or a recommendation if appropriate. Comments are normally associated with positive findings where recommendations are normally associated when either responding "no" or where there are specific recommendations to strengthen the program.

Requirement: Maintain an Illicit Discharge Detection and Elimination Program (IDDE)

Measurable Goal: Maintain a written Illicit Discharge Detection and Elimination Program, including provisions for program assessment and evaluation and integrating program elements into the overall stormwater program.

MEP

1. Does the LOCAL GOVERNMENT maintain a written Illicit Discharge Detection and Elimination Program?
2. Does the written Illicit Discharge Detection and Elimination Program include provisions for program assessment and evaluation?
3. Has the LOCAL GOVERNMENT documented any changes to programs or practices?
4. Does the Stormwater Management Program address the non-storm water discharges or flows?

Sustainability

5. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs?

   a. If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
   b. If yes, do the standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when it needs to get done? Are responsibilities and assignments documented?
   c. If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
   d. If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
   e. If yes, are annually reviews of standard operating procedures, policies, and written programs conducted and documented?
   f. If yes, are standard operating procedures, policies, and written programs revised as needed?
   g. If yes, are there written procedures to coordinate efforts to eliminate illicit discharge and cross connections?
   h. If yes, are there written procedures to maintain the sanitary sewer system?

NPDES PERMIT – PART II SECTION D (2)(b)

Requirement: Maintain adequate legal authorities

Measurable Goal: Maintain an IDDE ordinances or other regulatory mechanisms that provide legal authority to prohibit illicit connections and discharges.

MEP

1. Does the LOCAL GOVERNMENT maintain an IDDE ordinances or other regulatory mechanisms that provides the legal authority to prohibit illicit connections and discharges?
2. Does the ordinance or other legal instrument include penalty provisions to ensure compliance, to require the removal of illicit discharges, and to address noncompliance?
3. Does the LOCAL GOVERNMENT have the ability to promptly require that violators cease and desist illicit discharges or discharges of stormwater in violation of any ordinance or standard and/or cleanup and abate such discharges?
4. Has the LOCAL GOVERNMENT documented any changes to programs or practices?

Sustainability

5. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs for their legal authority?

    a. If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
    b. If yes, do the standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when it needs to get done? Are responsibilities and assignments documented?
    c. If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
    d. If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
    e. If yes, are annually reviews of ordinances or other regulatory mechanisms conducted and documented?
    f. If yes, are IDDE ordinances or other regulatory mechanisms revised as needed?
    g. If yes, has the LOCAL GOVERNMENT developed a written enforcement response plan (ERP) which clearly describes the action to be taken for common violations – including enforcement, outreach, and finding cooperative solutions?
    h. If yes, does the LOCAL GOVERNMENT's enforcement response plan (ERP) include enforcement responses that vary with the type of permit violation?
    i. If yes, does the LOCAL GOVERNMENT's enforcement response plan (ERP) include escalating enforcement if violations are repeated or not corrected?

NPDES PERMIT – PART II SECTION D (2)(c)

Requirement: Maintain a current storm sewer system map showing major outfalls and receiving stream

Measurable Goal: Maintain a current storm sewer system map showing major outfalls and receiving stream.

MEP

1.   Does the LOCAL GOVERNMENT maintain a current storm sewer system map showing major outfalls and receiving stream?
2.   Is there an up-to-date Storm Sewer System Map of Major Outfalls?
3.   Does the storm sewer map identify the names and location of all receiving waters?

Sustainability

4.   Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs for their IDDE mapping?

  a.   If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
  b.   If yes, do the standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when it needs to get done?
  c.   If yes, are responsibilities and assignments documented?
  d.   If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
  e.   If yes, does the LOCAL GOVERNMENT describe the sources of information for the maps, and how the permittee plans to verify the outfall locations?
  f.   If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
  g.   If yes, is each mapped outfall given an individual identifier, which may be noted on the map and identify priority areas identify priority areas and field screening stations?
  h.   If yes, does the LOCAL GOVERNMENT have a written SOP in place to regularly update the map?
  i.   If yes, does stormwater map include drainage areas, monitoring stations, stormwater pipes, inlets and other structures (e.g., detention ponds and other structural BMPs)?
  j.   If yes, is there a process to identify and add new outfalls to the Storm Sewer System Map?
  k.   If yes, are annually reviews of standard operating procedures, policies, and written programs conducted and documented?
  l.   If yes, are standard operating procedures, policies, and written programs revised as needed?

Requirement: Implement a program to detect dry weather flows.

Measurable Goal: Maintain a program for conducting dry weather flow field observations in accordance with written procedures.

MEP

1. Does the LOCAL GOVERNMENT maintain a program for conducting dry weather flow field observations in accordance with written procedures?
2. Does the LOCAL GOVERNMENT have an inspection program to detect dry weather flows?
3. Does the LOCAL GOVERNMENT conduct dry weather inspections and take reasonable steps to mitigate any illicit dumping discovered during these inspections?
4. Are incidental non-stormwater discharges addressed?
5. Does the inspection program identify procedures for removing the source of the illicit discharge?
6. Has the LOCAL GOVERNMENT documented any changes to programs or practices?
7. Does the LOCAL GOVERNMENT immediately report dry weather flows believed to be an immediate threat to human health or the environment?
8. Does the LOCAL GOVERNMENT have a method for the community to report illegal dumping and illicit discharges?
9. Has the LOCAL GOVERNMENT found any illicit discharges/illegal dumping in the last 12 months?

    a. If yes, was the source of each illicit discharge/illegal dumping identified?
    b. If yes, were all illicit discharges/illegal dumping found resolved? Enter in the comment section: How many were not resolved and If not resolved why was it/were they not resolved?

Sustainability

10. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to detect dry weather flows?

    a. If yes, does the LOCAL GOVERNMENT maintain a list of standard operating procedures, policies, and written programs and does the list identify when it was last updated?
    b. If yes, do standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, and when they need to get it done?
    c. If yes, do standard operating procedures, policies, and written programs identify procedures for tracing the source of an illicit discharge, including the specific techniques used to detect the location of the source?
    d. If yes, has the LOCAL GOVERNMENT properly implemented standard operating procedures, written programs, checklist, policies, etc.?
    e. If yes, does the local government maintain a table that identifies what best management practices will be used, their frequency, measurable goals, implementation schedule, and the responsible person or position for implementation?
    f. If yes, are annually reviews of standard operating procedures, policies, and written programs conducted and documented?
    g. If yes, are standard operating procedures, policies, and written programs revised as needed?
    h. If yes, does the LOCAL GOVERNMENT identify most prevalent sources and pollutants in the illicit discharge data, and where are these illicit discharges occurring?
    i. If yes, are there benchmark concentration levels for dry weather field screening and analytical monitoring?

j.   If yes, do exceedance of the benchmark require follow-up investigations to identify and eliminate the source causing the exceedance?
k.   If yes, does the LOCAL GOVERNMENT have written procedures to identify and update priority areas and hot spots?
l.   If yes, does the do standard operating procedures, policies, and written programs establish how to identify priority areas likely to have illicit discharges?
m.   If yes, does the LOCAL GOVERNMENT update priority areas to reflect changing priorities?
n.   If yes, has the LOCAL GOVERNMENT set a schedule to conduct outfall screening? If a schedule is followed 1) enter in the comment section how often screening is conducted, i.e., weekly, monthly, quarterly, annual, complaint driven, or other, 2) the number of outfalls screened in the last 12 months, 3) how many had dry weather discharges or flows, 4) how many outfalls or screening points were field analyses completed, 5) for what parameters they were analyzed, such as e. coli, TN, TSS, etc., and 6) how many outfalls or screening points were samples collected and analyzed by a lab?

Requirement: Investigate illicit discharges

Measurable Goal: The permittee shall maintain written procedures for conducting investigations of identified illicit discharges.

MEP

1. Does the LOCAL GOVERNMENT maintain written procedures for conducting investigations of identified illicit discharges?
2. Has the LOCAL GOVERNMENT conducted investigation(s) to identify, locate, and eliminate the source of any continuous or intermittent non-stormwater discharge?
3. Does the LOCAL GOVERNMENT conduct inspections? *Enter in the comment section the number of IDDE inspections conducted.*
4. Does the LOCAL GOVERNMENT conduct inspections in response to complaints? *Enter in the comment section the number of IDDE inspections conducted in response to complaints.*
5. Has the LOCAL GOVERNMENT documented any changes to programs or practices?
6. Has the LOCAL GOVERNMENT identified the steps taken when the LOCAL GOVERNMENT identifies cross connection, infiltration, failed septic system, or SSO?
7. Does the LOCAL GOVERNMENT determine (and document) through its investigations the source of illicit discharges?
8. Once the source of the illicit discharge has been determined, does the LOCAL GOVERNMENT conduct all necessary corrective actions to eliminate the non-stormwater discharge?
9. Has the LOCAL GOVERNMENT identified where illicit discharges are occurring? *Enter in the comment section the number of illicit discharges and how many of those have been resolved?*
10. Upon being notified that the discharge has been eliminated, does the LOCAL GOVERNMENT verify that the discharge has been eliminated?

Sustainability

11. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs for conducting investigations of identified illicit discharges?

    a. If yes, do standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when they need to get it done, where it is to be done?
    b. If yes, does the LOCAL GOVERNMENT track the complaints?
    c. If yes, does the LOCAL GOVERNMENT conduct follow-up inspections?
    d. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?
    e. If yes, has the LOCAL GOVERNMENT identified any cross connections in the past 12 months? *Enter in the comment section the number of cross connections were found in the past 12 months.*
    f. If yes, has s the LOCAL GOVERNMENT identified any infiltration or in-flow (I&I) into the LOCAL GOVERNMENT?
    g. If yes, has the LOCAL GOVERNMENT identified any failed septic systems?
    h. If yes, does the LOCAL GOVERNMENT conduct follow-up investigations?
    i. If yes, does the LOCAL GOVERNMENT recover remediation costs or required compensation for the cost of field screening and investigations?

Requirement: Track and document illicit discharge investigations

Measurable Goal: For each case the permittee shall track and document 1) the date(s) the illicit discharge was observed; 2) the results of the investigation; 3) any follow-up of the investigation; and 4) the date the investigation was closed.

MEP

1. For each case does the LOCAL GOVERNMENT track and document the date(s) the illicit discharge was observed?
2. For each case does the LOCAL GOVERNMENT track and document the results of the investigation?
3. For each case does the LOCAL GOVERNMENT track and document any follow-up of the investigation?
4. For each case does the LOCAL GOVERNMENT track and document the date the investigation was closed?

Sustainability

5. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to track and document illicit discharge investigations?

    a. If yes, does the LOCAL GOVERNMENT investigate and mitigate any reported illicit discharge?
    b. If yes, does the LOCAL GOVERNMENT identify most prevalent sources and pollutants in the illicit discharge data, and where are these illicit discharges occurring?
    c. If yes, does the LOCAL GOVERNMENT track illicit connections reported by employees or businesses?
    d. If yes, does the LOCAL GOVERNMENT track the number and resolution of IDs?
    e. If yes, does the LOCAL GOVERNMENT track where illicit discharges occurring?
    f. If yes, does each standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when they need to get it done, where it is to be done?
    g. If yes, for inspections and dry weather flow investigations, does the LOCAL GOVERNMENT record general information such as time since last rain, quantity of last rain, site descriptions (e.g., conveyance type, dominant watershed land uses), flow estimation (e.g., width of water surface, approximate depth of water, approximate flow velocity, flow rate), and visual observations (e.g., odor, color, clarity, floatables, deposits/stains, vegetation condition, structural condition, and biology)?
    h. If yes, does the LOCAL GOVERNMENT track outfalls or screening points that were visually screened?
    i. If yes, does the LOCAL GOVERNMENT track how many samples were collected and analyzed?
    j. If yes, does the LOCAL GOVERNMENT track parameters? *Enter in the comment section the parameters tracked*
    k. If yes, does the LOCAL GOVERNMENT maintain collected information in a georeferenced database?
    l. If yes, are dry weather tests/inspections tracked?
    m. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to strengthen their program to track and document IDDE?

Requirement: Provide Employee Training

Measurable Goal: The permittee shall implement and document a training program for appropriate municipal staff, who as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection.

MEP

1. Does the LOCAL GOVERNMENT implement and document a training program for appropriate municipal staff, who as part of their normal job responsibilities, may come into contact with or otherwise observe an illicit discharge or illicit connection?
2. Has the LOCAL GOVERNMENT documented any changes to programs or practices?

Sustainability

3. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to train employees?

   a. If yes, do standard operating procedures, policies, and written programs identify staff that need training and describe their qualifications?
   b. If yes, does the LOCAL GOVERNMENT maintain copies of the training materials used, the agenda, a brief description of the topic discussed, who provided the training, who was trained, what they were trained on, and when they were trained? *Enter in the comment section: Which employees are trained, i.e., maintenance staff, building inspectors, public works, inspectors, field staff, office staff, contractors, etc. and indicate whether the training is annual, quarterly, monthly, weekly or other.*
   c. If yes, does the LOCAL GOVERNMENT document training of each employee?
   d. If yes, does the LOCAL GOVERNMENT train appropriate staff on the identification of an illicit discharge or connection, and on the proper procedures for reporting and responding to the illicit discharge or connection? *Enter in the comment section: Which employees are trained, i.e., maintenance staff, building inspectors, public works, inspectors, field staff, office staff, contractors, etc.*
   e. If yes, does the LOCAL GOVERNMENT provide follow-up training as needed to address changes in procedures, techniques, or staffing?
   f. If yes, does the training include a general stormwater education component, any new technologies, operations, or responsibilities that arise during the year and the Permit Requirements that apply to the staff being trained?
   g. If yes, does the LOCAL GOVERNMENT provide "refresher" training? *Enter in the comment section: Which employees receive refresher training, i.e., maintenance staff, building inspectors, public works, inspectors, field staff, office staff, contractors, etc.*
   h. If yes, does the LOCAL GOVERNMENT train new employees within a certain time of their hire date? **Enter in the comment section how often new employees are trained.**
   i. If yes, does the LOCAL GOVERNMENT identify and track all personnel requiring training and the training date?
   j. If yes, does the LOCAL GOVERNMENT provide and document training for contractors on illicit discharge?
   k. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?

Requirement: Provide Public Education

Measurable Goal: The permittee shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

MEP

1. Does the LOCAL GOVERNMENT inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste?
2. Has the LOCAL GOVERNMENT documented any changes to programs or practices?

Sustainability

3. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste?

   a. If yes, are educational efforts prioritized based upon historic issues, priority watersheds or land uses?
   b. If yes, are IDDE and illegal dumping priorities integrated into educational plan and/or good housekeeping plan?

   General Public

   c. If yes, does is there proper incentive for public employees to participate in detecting illicit discharges?
   d. Effectiveness: If yes, is there an increased number of reported private illicit discharges by the public (i.e., they are finding illicit discharges based on their training)?
   e. Effectiveness: If yes, are there a decreased number of illicit discharges on public properties as a result of training?
   f. Is general public education targeted to illicit discharges commonly found in residential settings (i.e., pet waste, fertilizer, waste oil, paint and other house products)?
   g. If yes, is general public training prioritized to hot spot locations with frequent complaints?

   Business Education

   h. If yes, does is business education targeted toward business groups with highest potential to pollute surface waters in your community (i.e., restaurants, industry, automotive etc.)?
   i. If yes, does the educational/training material provide meaningful alternatives for proper handling of waste materials that could otherwise end up in the storm drain?
   j. If yes, does are business owners made aware of ordinances pertaining to illicit discharges and illegal dumping as part of education? **Enter in the comment section the number of businesses with violations pre vs. post education**

ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM (IDDE)

<u>Overall</u>

k.   If yes, has the LOCAL GOVERNMENT developed educational material and distributed to target audiences?

l.   If yes, has the public education program targeted entities with the potential to pollute surface waters?

m.   If yes, are educational/training efforts reducing the number of illicit discharge issues from identified groups that received the education/training materials? **Enter in the comment section the number of identified groups with violations pre vs. post education**

n.   If yes, are training materials being updated to stay current with identified target pollutants?

o.   If yes, does each SOP specify what needs to happen, who needs to do it, how much they need to do, when they need to get it done, where it is to be done?

p.   If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?

Requirement: Provide a public reporting mechanism

Measurable Goal: The permittee shall promote, publicize, and facilitate a reporting mechanism for the public and staff.

MEP

1. Does the LOCAL GOVERNMENT promote, publicize, and facilitate a reporting mechanism for the public and staff to report illicit discharges?
2. Has the LOCAL GOVERNMENT established and implemented citizen request response procedures?
3. Has the LOCAL GOVERNMENT documented any changes to programs or practices?

Sustainability

4. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to promote, publicize, and facilitate a reporting mechanism for the public and staff to report illicit discharges and establish and implement citizen request response procedures?

   a. If yes, has the LOCAL GOVERNMENT developed multiple methods for public reporting (such as phone or website apps)?
   b. If yes, does the LOCAL GOVERNMENT verify that each reporting method is functional on an annual basis? *Enter the methods in the comment section*.
   c. If yes, has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to ensure complainant has been notified of resolution to ensure customer service and build program support?
   d. If yes, does the LOCAL GOVERNMENT evaluate the reporting mechanism to ensure program effectiveness?
   e. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?
   f. If yes, does each standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when they need to get it done, where it is to be done?

5. Has the website been advertised to user groups? *If Yes, enter in the comment section how the website is advertised to user groups.*

   a. If yes, is the illicit discharge reporting section easily navigated?
   b. If yes, does the webpage contain all the needed intake information to report an illicit discharge?
   c. If yes, does staff have a protocol for checking web based complaints in a timely manner?
   d. If yes, is follow up with the citizen and close out of the complaint documented for all web originated complaints?

6. Does the LOCAL GOVERNMENT maintain a log of hotline calls and actions taken?

   a. If yes, has the hotline number been advertised to user groups? *If yes, enter in the comment section how the website is advertised to user groups.*
   b. If yes, are call takers educated on the questions to ask citizens reporting illicit discharges?
   c. If using an automated system, is staff checking for calls on a regular basis?
   d. Is follow up with the citizen and close out documented for all Hotline originated complaints?

ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM (IDDE)

Requirement: Enforcement of the IDDE ordinance

Measurable Goal: The permittee shall implement a mechanism to track the issuance of notices of violation and enforcement actions as administered by the permittee. This mechanism shall include the ability to identify chronic violators for initiation of actions to reduce noncompliance.

MEP

1. Does the LOCAL GOVERNMENT implement a mechanism to track the issuance of notices of violation and enforcement actions as administered by the permittee?
2. Are adequate legal authority and tools available to inspectors to enforce stormwater requirements?
3. Does the mechanism identify chronic violators?
4. Does the LOCAL GOVERNMENT have enforcement procedures for instances of chronic non-compliance?
5. Are the issuance of notices of violation and enforcement actions documented?
6. Has the LOCAL GOVERNMENT documented any changes to programs or practices?

Sustainability

7. Has the LOCAL GOVERNMENT developed standard operating procedures, policies, and written programs to track the issuance of notices of violation and enforcement actions?

    a. If yes, does the LOCAL GOVERNMENT have the ability to order the cessation of activities until such problems are adequately addressed?
    b. If yes, does the LOCAL GOVERNMENT maintain and implement an enforcement response plan (ERP) that identifies the different types of enforcement actions taken?
    c. If yes, does the LOCAL GOVERNMENT have the ability to levy citations or administrative fines against responsible parties and require recovery and remediation costs from responsible parties?
    d. If yes, does the LOCAL GOVERNMENT have the ability to impose more substantial civil or criminal sanctions (including referral to a city or district attorney) and escalate corrective response for persistent non-compliance, repeat or escalating violations, or incidents of major environmental harm?
    e. If yes, does the LOCAL GOVERNMENT have the ability to clean up and abatement work and bill the responsible party?
    f. If yes, does the LOCAL GOVERNMENT have the ability to effectively require the discharger to abate and clean up their discharge, spill, or pollutant release?
    g. If yes, does the LOCAL GOVERNMENT have Right-of Entry?
    h. If yes, does the LOCAL GOVERNMENT track instances of non-compliance?
    i. Can industrial/commercial inspectors administer enforcement actions? ***If yes, enter in the comment section what types of enforcement actions. If no, enter in the comment section who can.***
    j. If yes, does each enforcement case include the name of owner/operator of facility or site of violation?
    k. If yes, does each enforcement case include the location of stormwater source (i.e., construction project, industrial facility)?
    l. If yes, does each enforcement case include the description of violation?
    m. If yes, does each enforcement case include the required schedule for returning to compliance?

n.   If yes, does each enforcement case include the description of enforcement response used, including escalated responses if repeat violations occur or violations are not resolved in a timely manner?

o.   If yes, does each enforcement case include the accompanying documentation of enforcement response (e.g., notices of noncompliance, notices of violations)?

p.   If yes, does each enforcement case include the any referrals to different departments or agencies?

q.   If yes, does each enforcement case include the date violation was resolved? *If no, enter in the comment section those not documented.*

r.   If yes, does the LOCAL GOVERNMENT analyze the data to assess the most common compliance problems, and then modify their controls/programs to address these problems?

s.   If yes, has the LOCAL GOVERNMENT summarized inspection results by chronic violators and include incentives, disincentives, or an increased inspection frequency at the operator's sites?

t.   If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?

u.   If yes, does each standard operating procedures, policies, and written programs specify what needs to happen, who needs to do it, when they need to get it done, where it is to be done?

ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM (IDDE)

SUSTAINABILITY QUESTIONS APPLICABLE TO THE OVERALL IDDE PROGRAM

1. Is the organization committed to the Illicit Discharge Detection and Elimination Program, i.e., provides adequate resources and supports program?

2. Has the LOCAL GOVERNMENT engaged & collaborated with stake holders?

   a. If yes, does the LOCAL GOVERNMENT coordinate with other local governments departments and staff, State, or County organizations to identify and eliminating illicit discharges, including cross training, meetings, memos, etc.?
   b. If yes, does the LOCAL GOVERNMENT coordinate with other local governments departments and staff, State, or County organizations to eliminate cross connections between sanitary and storm sewers?
   c. If yes, does the LOCAL GOVERNMENT coordinate with the County Health Department to ensure proper operation and maintenance of on-site wastewater treatment systems for domestic wastewater?
   d. If yes, does the LOCAL GOVERNMENT collaborate with organizations such as APWA, SWANC, etc. as well as other LOCAL GOVERNMENTs, and other stake holders to strengthen their IDDE Program?

3. Has the LOCAL GOVERNMENT completed an assessment of the Illicit Discharge Detection and Elimination Program?

   a. If yes, has the LOCAL GOVERNMENT conducted and documented annual reviews of the Illicit Discharge Detection and Elimination Program including any SOPs, policies and/or written plans?
   b. If yes, does the LOCAL GOVERNMENT maintain a written explanation of how the LOCAL GOVERNMENT will evaluate the success of their Illicit Discharge Detection and Elimination Program?
   c. If yes, has the LOCAL GOVERNMENT identified recommendations to strengthen the program?

4. Has the LOCAL GOVERNMENT developed and implemented an action plan with deadlines to address the areas that need to be strengthened?

   a. If yes, has the LOCAL GOVERNMENT identified the root causes of any findings and/or recommendations?
   b. If yes, has the LOCAL GOVERNMENT developed and implement a plan and schedule to address the identified modifications and improvements?
   c. If yes, has the LOCAL GOVERNMENT documenting changes to programs or practices?
   d. If yes, has the LOCAL GOVERNMENT identified deadlines to implement changes to the programs or practices?
   e. If yes, has the LOCAL GOVERNMENT trained Staff on the changes and/or revised SOPs?