



Reactive Inspection Program

Section III.A.7.c – Illicit Discharges and Improper Disposal – Inspection and Investigation of Suspected Illicit Discharges and/or Improper Disposal. This permit element requires a written reactive investigation program for suspected illicit discharges and/or illegal dumping reported by others.

Procedure for tracing source of discovered illicit discharge:

- Look for illicit as described by the caller.
- Inspect land surface area.
- Inspect surrounding inlets.
- Inspect storm manholes (if applicable) for indicators that can isolate discharges to a specific pipe segment.
- Follow pipe/inlet to source.
- Document source and determine if illicit is flowing/connected to a body of water.
- Determine whether a MSGP (multi-sector general permit) is required.

Procedure for eliminating the discharge:

- Determine type of spill/illicit connection.
 - Verbally notify property owner/manager to contain contaminant.
 - Notify State Warning Point if applicable.
 - Determine what needs to be repaired and/or clean up required and notify property owner/manager.
 - Schedule follow up and document.
 - If following up inspection shows non-compliance, provide written warning to property owner/manager.
 - If applicable, mark property for escalated frequency of inspection.
- ✓ All inspections and follow up inspections will be documented and placed within the facility's City file.
 - ✓ Any facility found not to be in compliance will be notified verbally. If non-compliance continues, further escalating notification will be put in place until compliance is followed.
 - ✓ Environmental Services IPP Inspectors and Community Improvement Code Enforcement Inspectors will conduct inspections, and IPP Inspectors and Code Enforcement Inspectors are responsible for enforcement of City codes.
 - ✓ The IPP Inspectors and Code Enforcement Inspectors are highly trained at detecting illicit discharges, and potential discharges, not only for sewer pretreatment, but also for stormwater. The Inspectors must receive regular, updated illicit discharges and spill detection, prevention and elimination training.



Illicit Discharge/Illegal Connection Inspection/Illegal Dumping Inspection Form

Date of Inspection: _____ Date of Call (if applicable) _____

Inspector: _____

Address of Facility OR General Description of Area Inspected: _____

Identification of MS4 component that could receive discharge from this site/area: _____

If Facility inspection, does type of business require an MSGP? Yes ___ No ___

If yes, does this facility have one? Yes ___ No ___

Findings:

Evidence of illicit connections to storm sewer? Yes ___ No ___

Evidence of dumping/spills to storm sewer? Yes ___ No ___

Evidence of wash water going to storm sewer? Yes ___ No ___

Storage tanks leaking or improperly contained? Yes ___ No ___

Stockpiles/debris piles uncontained? Yes ___ No ___

If "yes," to any above, describe:

Type of Enforcement Action Taken: _____

Date to verify elimination: _____

Date of Referral to FDEP of facility that may require MSGP: _____