9.0 ILLICIT DISCHARGE DETECTION AND ELIMINATION COMPONENT

9.1 INTRODUCTION

The programs described in this section were developed, pursuant to Section D.4.a of the Municipal Permit, to meet the requirements specified in Section J.1.(h) of the Municipal Permit and Section B of the General Industrial Permit.

The Municipal Permit requires that the Authority establish an Illicit Discharge Detection and Elimination (IDDE) program to actively seek and eliminate illegal discharges and connections to the storm drain system This program provides a framework for the detection, investigation and follow-up, and elimination of reported violations. The program is designed to be adaptive and allow the Authority to periodically assess collected data, re-evaluate areas of concern, and concentrate control methods and corrective actions as necessary in those areas.

The General Industrial Permit requires each tenant to identify and eliminate potential sources of pollution at their site, which also supports the primary goal of the IDDE Program. Section B.3 of the General Industrial Permit requires the Authority to perform non-stormwater discharge visual observations and Section B.4 of the General Industrial Permit requires the Authority to perform stormwater discharge visual observations. Section 7.2.4 of this SWMP addresses both these requirements. These quarterly visual observations and facility inspections actively seek to detect and eliminate illegal discharges. High priority industrial/commercial entities at SAN are required to implement BMPs to prevent spills and illicit discharges from entering the storm drain system (see Section 7 of this SWMP).

An illegal discharge is any discharge of pollutants to the storm drain system that is not comprised entirely of stormwater and not authorized by a NPDES permit. Washwater, sediment, spilled chemicals, and other pollutants allowed to enter the storm drain system, either intentionally or unintentionally, contribute to the degradation of the local water quality. Releases from the sanitary sewer or private laterals can allow pathogens, ammonia, detergents, and other contaminants to enter the storm drain system.

Illicit connections are any conveyances that have illegally been connected to the storm drain system and that are currently discharging or have the potential to contribute an illegal discharge. These connections provide pathways for pollutants to enter the storm drain system. Improperly installed or defective rain diversion systems or devices that release pollutants into the storm drain system will also be considered illicit connections.

The IDDE program incorporates several elements of the Authority's stormwater management program to develop a comprehensive approach to preventing, detecting, and eliminating illicit discharges. Inspection, maintenance, and enforcement activities contribute to the identification of illicit discharges and the elimination of those detected. Often, when an illicit discharge is detected as a part of an inspection or maintenance program, it can be eliminated before it affects a receiving water. Authority regulations prohibit illicit

discharges. The Authority code can require a responsible party to conduct abatement activities to eliminate an illicit discharge, or for the Authority to conduct those activities itself at the cost of the responsible party. Enforcement programs are discussed in Section 2.

Authority staff and airport tenants play an important role in the detection of illicit discharges. Education and outreach efforts for Authority staff and airport tenants are directed at stormwater pollution prevention, including the detection and elimination of illicit discharges. Education programs for the Authority staff are provided in Section 10.

The Authority conducts or participates in the urban runoff monitoring programs to meet requirements of both the General Industrial Permit and the Municipal Permit. Several of these programs help to identify non-stormwater illicit discharges and their potential sources within the Authority's jurisdiction. The Authority can also utilize the data collected through monitoring efforts to identify and eliminate illicit discharge sources. The General Industrial Permit requires quarterly observations and facility inspections, as well as a wet weather monitoring program, to identify potential sources of pollution. The Municipal program requires observations and water quality analysis of dry weather flows between June and September as a part of the Dry Weather Monitoring program. General Industrial Permit Section B.5 also requires the Authority to conduct appropriate stormwater sampling and analysis and Section B.7 requires the Authority to visually observe and collect samples of stormwater discharge from all drainage areas that represent the quality and quantity of the facility's storm discharges from the storm event. General Industrial Permit Section B.10 requires the Authority's stormwater monitoring program to meet the Permit objectives of ensuring that facility discharges are in compliance with the Permit, that monitoring data is used to validate and revise the stormwater management program, as necessary, and that monitoring data is used to evaluate the effectiveness of the BMPs being implemented at the facility. Section 9.4.4, Section 13, and Appendix D of this SWMP have been prepared to address these requirements. Appendix D presents both the Dry Weather Monitoring program required by the Municipal Permit (see Appendix D-1) and the wet weather monitoring program required by the General Industrial Permit (see Appendix D-2).

Various elements of the Authority stormwater management program which comprise the IDDE Component are described elsewhere within this SWMP. The following section discusses those IDDE programs elements that are not described in other sections of this document.

9.2 PUBLIC REPORTING OF ILLICIT DISCHARGES AND CONNECTIONS

Public reporting mechanisms are an effective way to promote the reporting of illegal discharges. To meet the Municipal Permit requirement of Section D.4.h, the Authority promotes three primary mechanisms for reporting complaints or concerns regarding unauthorized non-stormwater discharges: 1) the Authority Environmental Affairs Department main telephone line (619-400-2782) and webpage (www.san.org/airport_authority/environmental_affairs/index.asp); 2) the Project Clean Water regional hotline (888-846-0800) and webpage (www.projectcleanwater.org) operated by the County of

San Diego on behalf of the Municipal Permit Copermittees; and 3) the THINK BLUE Hotline at (888-844-6525) and webpage (www.sandiego.gov/thinkblue) operated by the City of San Diego. Both regional hotlines are available Monday through Friday, 8:00 a.m. to 5:00 pm, and provide a voice mail message for 24-hour access in both English and Spanish. The hotline operators forward complaint information, as appropriate, to the Authority Environmental Affairs Department for investigation and follow-up.

The Authority Airport Operations Department also operates a 24-hour telephone line that allows Authority staff and airport tenants to report complaints or concerns regarding unauthorized non-stormwater discharges. This reporting mechanism is promoted by including the telephone number on the back of Airport Security ID Badges that are issued at the airport.

Each call that is forwarded to the Authority through these public reporting mechanisms is handled as an incoming complaint and entered into the database as a unique incoming record. All reported incidents, along with a description of how each one was investigated and/or resolved, will be summarized in the Annual Report required by the Municipal Permit.

9.3 SPILL PREVENTION. REPORTING, AND RESPONSE

The Authority has programs and procedures to prevent, respond to, contain, and clean up all sewage and other spills that may impact the storm drain system, as required by Section D.4.g of the Municipal Permit. Many of the same programs and procedures are implemented as a requirement of the General Industrial Permit.

9.3.1 SPILL PREVENTION

Sanitary Sewers

As discussed in Section 6.5 of this SWMP, the Authority's preventive and corrective sanitary sewer maintenance programs focus heavily on those areas of known problems or concerns. Known problem areas typically consist of the lines immediately downstream of food services, which have a tendency to be impacted by grease. For all locations, the Authority provides for or requires the food service provider (as a requirement of the lease) to conduct the minimum of annual routine monitoring, inspection, and cleaning. When system malfunctions do occur, such as stoppages, the cause of the problem is investigated and analyzed. Maintenance schedules are then adjusted accordingly. If necessary, repairs are initiated by Authority maintenance crews or food service provider, as appropriate. If appropriate, the infrastructure component is referred for repair or replacement by maintenance crews. Larger, more complex issues generally become recommendations for capital improvement projects as part of the Authority budget planning and approval process (described in Section 12 of this SWMP).

Other Spills

Refueling and equipment maintenance activities utilize jet fuel, aviation gas, hydraulic oils, oil, deicing fluids, degreasers, and other solvents. Due to the intensity of use, there is a higher possibility of significant spills of jet fuel. Jet fuel is stored in aboveground tanks at the FSF and distributed via pipeline to a RFF. Aircraft fueling is performed by a fleet of fuel trucks (containing several hundred gallons of fuel) operated by three refueling operations. The fuel trucks operate on the ramp areas of the main terminals, the FBO, the air cargo, and overnight aircraft parking areas. The Authority requires the implementation of spill response BMPs, secondary containment, and other mechanisms to prevent and avoid spills. Spills from tenants are reduced through the required use of BMPs, education, and enforcement of relevant regulations for the storage and usage of hazardous materials.

9.3.2 SPILL REPORTING

In the event of a spill, the responsible party (Authority staff or airport tenant) is required to contact Airport Operations (619-400-2710) and Harbor Police (619-686-8000). If the Authority determines that the incident endangers human health or the environment, then the Authority will provide verbal notification to the RWQCB within 24 hours from the time the Authority becomes aware of the circumstances. Within 5 days of the time the Authority becomes aware of the circumstances, the Authority will provide the RWQCB with a written submission containing a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

9.3.3 SPILL RESPONSE

Each tenant, contractor, or Authority staff responsible for any spill of sewage or other material is also responsible for immediately responding to that spill. Immediate response to a spill helps to prevent an unauthorized release to the storm drain system and to prevent further contamination of stormwater runoff due to spill residuals on the surface. The appropriate spill response includes: carrying out appropriate notification procedures, stopping the source of the spill, spill containment, implementing the proper clean-up procedures, immediate and proper disposal of the spilled materials and other items used for the clean-up, and maintaining records.

Each facility / operation that utilizes, stores, and / or generates hazardous materials is responsible for creating spill response procedures and ensuring that their employees are properly trained in those procedures. The General Industrial Permit requires the preparation of spill response procedures, and those procedures are described in Sections 7.2.2 and 7.2.3 of this SWMP and the "Spill Prevention, Control, and Clean-up" BMP (SR01) provided in Appendix B. Each airline tenant is responsible for maintaining spill response equipment in their terminal gate area. Spill response equipment includes absorbent materials, shovels, brooms, gloves, and other necessary items. In addition to spill response equipment maintained by the airline tenants and the fuel vendors, the Authority has established, and strategically located on the airfield, 3 spill response trailers with an adequate inventory of spill response equipment to respond any spills, including a worst-case incident. Authority

staff and airport tenant education and outreach efforts highlight the existence and intended use of these spill response trailers.

Small Spill Cleanup Procedures

Small spills of jet fuel, hydraulic oil, lube oil, or lavatory wastes are generally efficiently cleaned up using bulk absorbent material. Absorbent is used as a dike to prevent spill migration into the storm drain system and is also used to absorb any ponded material. All waste sorbent and waste material should be stored in a Department of Transportation-approved drum that is properly labeled with the contents, generation date, and facility contact information.

Large Spill Cleanup Procedures

In the case of a large spill, the responsibility for initial action remains with the party responsible for the spill. In the case of a large fuel or sewage spill, a systematic and controlled response is especially vital. The following procedures can be used as guidelines for responding to a large spill of either a petroleum product or sewage. These activities should be performed as appropriate considering the details of the spill:

- Stop the source:
  - Shut off valves on aircraft or refueler trucks;
  - Install plugs in ruptured tanks or vale fittings;
  - Relocate leaking vehicle to nearby area of secondary containment;
  - Transfer fuel into other vessels, tanker trucks, etc.
- Perform notifications:
  - Tenants Contact Airport Operations (619-400-2710) and Harbor Police (619-686-8000).
- Airport Operations and Harbor Police Contact:
  - Airport Rescue and Fire Fighting Facility (619-231-5204);
  - Authority Environmental Services (619-400-2782);
- California Department of Fish and Game / Office of Spill Prevention and Response 24-hr hotline (916-445-0045) or CalTip line 1 (888-334-2258), as necessary or required by law;
- U.S. Coast Guard (619-683-6495), as necessary or required by law;
- Regional Water Quality Control Board (858-467-2952), as necessary or required by law;
- EPA Office of Emergency Services (8000-852-7750), as necessary or required by law;

- National Response Center (800-424-8802), as necessary or required by law.
- Contain and absorb the spill:
  - Prevent the spill from reaching the storm drain;
  - Create dikes with absorbent or other material;
- Plug storm drain inlets with rubber mats and tarps and collect ponded materials by vacuum truck, drum-mounted vacuum, squeegee roller, or other means;
- Remove materials from the storm drain system by installing an absorbent pad / plug up and down gradient of the inlet by which the spill entered the storm drain. A plug is needed up gradient to prevent rising tidal action from dispersing oil throughout the storm drain system. Use a weir skimmer and / or pumps to remove materials from the storm drain system for proper disposal.
- Protect San Diego Bay, as necessary, by installing barrier booms and / or absorbent booms at the storm drain outfall and monitoring outfall for signs of release.
- Make follow-up notifications and submit reports, as necessary, to agencies necessary or required by law.

Incident Command System Implementation

Several Authority staff have been trained in the application of incident command systems for large-scale emergency incidents, such as a large fuel or sewage spill. The responsible party may voluntarily relinquish control of spill response responsibilities to a Federal, State, or Local agency appropriately prepared to respond, and the responsible party should not hesitate to do so when requested by such an agency. In situations where the release threatens public safety and property damage by fire, explosion, vapor levels, or if structural collapse is imminent, the SAN ARFF Department has overall authority to control response actions. Only after the immediate threat to life and property has been abated and the ARFF has relinquished exclusive site control will the responsible party enter the incident command system structure. The incident command system will be used to apply control in any emergency response where multiple agencies are involved. Where appropriate, the responsible party may be requested to participate in various aspects of the incident command system.

9.4 URBAN RUNOFF MONITORING

The following urban runoff monitoring programs were developed to meet the requirements of: 1) Sections D.4.c and J.1.(h)iii of the Municipal Permit, as more fully described in Section II.B of the Receiving Waters Monitoring and Reporting Program requirements of the Municipal Permit; and 2) Section B of the General Industrial Permit. The monitoring programs implemented at SAN by the Authority are described in SWMP Appendix D.

9.4.1 MS4 OUTFALL MONITORING

As required by Section II.B.1 of the Receiving Waters Monitoring and Reporting Program of the Municipal Permit, the Authority is collaborating with the County of San Diego, Port of San Diego, and the cities of Chula Vista, Coronado, Imperial Beach, La Mesa, Lemon Grove, National City, and San Diego (collectively, the San Diego Bay Watershed Copermittees) to develop a MS4 Outfall Monitoring Program and characterize pollutant discharges from MS4 outfalls in the San Diego Bay watershed during wet and dry weather.

Selection of Outfalls to be Monitored

The storm drain system outfall monitoring locations will coincide with the existing dry weather monitoring locations described in more detail in Appendix D. The monitoring locations were selected as far downstream as possible to capture as many areas with industrial activities and sources of potential illicit discharges as possible and provide adequate coverage of the storm drain system.

Pollutants of Concern

SAN lies within the San Diego Bay Watershed. The San Diego Bay Watershed is 303(d) listed for the following segments and associated constituents: Chollas Creek - copper, lead, zinc, cadmium, coliform bacteria, stormwater toxicity; San Diego Bay - bacteria indicators, metals, diazinon, chlordane, benthic community effects, copper, and sediment toxicity. Discharges from several source basins throughout the watershed contribute to these impairments.

9.4.2 SOURCE IDENTIFICATION MONITORING

In accordance with Section II.B.1 of the Receiving Waters Monitoring and Reporting Program of the Municipal Permit, the Authority will work with the San Diego Bay Watershed Copermittees to develop a source identification monitoring program that will identify sources of discharges of pollutants causing the priority water quality problems within their watershed. The monitoring program will include focused monitoring that moves upstream into each watershed and will utilize source inventories and "Threat to Water Quality" analysis to guide monitoring efforts. The Municipal Permit requires that the program be implemented in each watershed by the 2008-2009 monitoring year. The Authority will continue efforts to identify sources within its jurisdiction through the implementation of existing monitoring, inspection, and BMP programs as described in Appendix D2.

9.4.3 DRY WEATHER FIELD SCREENING AND ANALYTICAL METHODS

The Authority has developed a Dry Weather Analytical Monitoring Program that contains 10 sites for field and analytical monitoring. This monitoring program is described in more detail in Appendix D1. A Trash Assessment Program has been developed in accordance with the Municipal Permit requirements and will be implemented at SAN in conjunction with the Dry Weather Monitoring Program. This monitoring program is described in detail in Attachment D1-A to Appendix D1.

Dry weather monitoring locations were selected to provide adequate coverage of the entire storm drain system. Monitoring locations were established to isolate particular land uses, drainage areas, and areas of concern based on historical data. A storm drain system map was created in GIS 9.0 to depict the storm drain system, the 14 drainage basins, and the monitoring locations. The storm drain system map is used in source investigations and satisfies the requirements of Section D.4.b of the Municipal Permit. During the dry weather monitoring, the storm drain system map is checked for accuracy and any necessary corrections and/or changes are made accordingly.

Dry weather monitoring consists of annual and other routine inspections of monitoring locations. The program implements observations, field screening water quality analysis, and laboratory analytical water quality analysis of various constituents in order to detect possible illicit discharges during dry weather.

Qualitative observations will be recorded at all sample locations. The inspector will complete a field data sheet for each monitoring location noting observations such as color, clarity, odor, biological characteristics, and an assessment of trash. The trash assessment includes an evaluation of spatial extent, relative amount of trash, and the nature of the trash present.

Dry weather analytical monitoring and trash assessments are required to be conducted, at a minimum, at least once between May 1 and September 30. Field screening water quality analysis is conducted at all monitoring locations that contain flowing or ponded water. Analytical laboratory analysis is conducted for a number of specifically selected sites (typically approximately 25 percent of the number of sites at which field screening is conducted). Appendix D1 of this document describes the field monitoring and laboratory analysis procedures including a list of constituents, equipment required, and quality assurance measures.

9.4.4 GENERAL INDUSTRIAL PERMIT WET WEATHER MONITORING

Section B of the General Industrial Permit requires development and implementation of a monitoring program. The Authority Environmental Affairs Department conducts the wet weather monitoring program at SAN. While the wet weather monitoring program is structured around General Industrial Permit compliance, it also addresses the source identification monitoring requirements of the Municipal Permit.

The General Industrial Permit (Section B.2) lists the following objectives for the stormwater monitoring program:

- Ensure that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the General Industrial Permit.

- Ensure practices at the facility to reduce or prevent pollutants in stormwater discharges and authorized non-stormwater discharges are evaluated and revised to meet changing conditions.

- Aid in the implementation and revision of the Storm Water Pollution Prevention Plan (SWPPP) required by Section A of the General Industrial Permit.

- Measure the effectiveness of BMPs to prevent or reduce pollutants in stormwater discharges and authorized non-stormwater discharges.

Under the General Industrial Permit, all facility operators are required to:

- Perform visual observations of stormwater discharges and authorized stormwater discharges;

- Collect and analyze samples of stormwater discharges. Analysis must include pH, total suspended solids (TSS), total organic carbon (TOC) (oil and grease (O&G) may be substituted for TOC), specific conductance (SC), toxic chemicals, and other pollutants which are likely to be present in stormwater discharges in significant quantities. Analysis is also required for those parameters listed in Table D of the Industrial Storm Water Permit. Applicable parameters listed in Table D are biological oxygen demand (BOD), chemical oxygen demand (COD), ammonium (NH3), and pH.

Facility operators are not required to collect samples or perform visual observations during adverse climatic conditions. Sample collection and visual observations are required only during scheduled facility operating hours. Visual observations are required only during daylight hours. Facility operators that are unable to collect any of the required samples or visual observations because of the above circumstances must provide documentation to the RWQCB in the annual report required under the General Industrial Permit.

The Authority is required to collect stormwater samples during the first hour of discharge from 1) the first storm event of the wet season, and 2) at least one other storm event in the wet season. The stormwater sampling locations at SAN are identified on the site map (Figure 3) and outlined below. Stormwater is not typically stored or contained at SAN, but if it were, the water would have to be sampled at the time the stored or contained stormwater is released. If samples are not collected from the first storm event of the wet season, the Authority must still collect samples from two other storm events of the wet season and it must explain in the annual report, required by the General Industrial Permit, why the first storm event was not sampled.

The Authority is required to be prepared to collect samples and conduct visual observations at the beginning of the wet season (October 1) and throughout the wet season until the minimum requirements of the General Industrial Permit are completed. Sample collection is only required of stormwater discharges that occur during scheduled facility operating hours (which the Authority has determined are 6:30 a.m. to 11:30 p.m. for SAN) and that are preceded by at least 3 days (72 hours) without stormwater discharge. Visual observations and sample collection should be conducted within the first hour of discharge. The Authority may conduct visual observations and sample collection more than one hour after discharge begins if the Authority determines that the objectives of the permits will be better satisfied. The Authority must include an explanation in the annual report, required by the General

Industrial Permit, whenever the visual observations and sample collection are not conducted during the first hour of discharge.

The details of the wet weather sampling program are described in Appendix D. The sampling program covers three types of sampling:

1. Compliance sampling - performed to comply with the General Industrial Permit;

2. Source identification sampling - performed to identify and rate sources of pollutants of concern (POCs) at SAN in terms of annual mass loading in stormwater, identify the potential for reduction of POC concentrations through BMP implementation, and identify that combination of sources best addressed through BMP implementation to achieve pollutant load reduction objectives; and

3. BMP Effectiveness sampling - performed to monitor the performance and effectiveness of BMPs. Although this is also stated as a requirement and objective of the General Industrial Permit, this objective is identified separately to allow more flexibility in monitoring the performance of BMPs beyond the requirements identified in the General Permit. Structural and non-structural BMP performance will be evaluated at locations that receive runoff from both industrial and non-industrial drainage basins to assess whether the BMPs are reducing pollutant concentrations (for both primary and secondary POCs) below benchmark values and whether BMPs are achieving the short-term and long-term pollutant load reduction objectives for the primary POCs at SAN (specifically, copper and zinc).

The Authority's Sampling Plan (MACTEC, 2005b) includes a quality assurance / quality control program to ensure monitoring is adequately conducted and that test procedures are in accordance with 40 CFR Part 136. See Appendix D2 for details on sampling locations and analytes being monitored.

9.5 FOLLOW-UP AND ENFORCEMENT

Source investigations are conducted by the Authority when an illicit discharge is detected or suspected and the source of the illicit discharge is not readily identifiable. The purpose of source investigations is to locate the source of an illicit discharge so that all necessary measures required to eliminate the illicit discharge can be implemented. This section has been prepared to meet the requirements in Sections D.4.d, D.4.e, and D.4.f. of the Municipal Permit.

9.5.1 SOURCE INVESTIGATION PROCEDURE

Source investigations will typically be conducted by the Authority's Environmental Affairs Department monitoring personnel. In some cases other onsite Authority personnel may conduct a source investigation. When conducting a source investigation, the personnel should be equipped with the set of equipment listed for the dry weather analytical monitoring program (Appendix D).

Source investigations are initiated when observations, field screening results, laboratory analytical results, or a reported complaint suggest a reasonable potential for the existence of an illicit discharge. The investigation action criteria for dry weather monitoring results were developed by the Municipal Permit Copermittees and are provided in Table D1-2 of Appendix D1. Within two business days of receiving dry weather field screening or laboratory results that exceed the action levels, the Authority will conduct an investigation to identify the source or provide a rationale for why the discharge does not pose a threat to water quality and does not need further investigation. The trash assessment process may also provide the Authority with useful information in regards to problem areas or activities.

In some cases, just the existence of flows in a portion of the storm drain system or the noticeable increase in dry weather flows at a certain location may trigger a source investigation. The Authority's monitoring personnel will use their judgment and experience in making these and similar decisions in the field based on site specific observations. The following steps are taken to identify and eliminate an illicit discharge (and are further described in Appendix D1).

- Step 1: Location of Initial Observation - If flow exists, confirmation samples should be collected and if it poses a threat to human health then actions will be taken immediately to contain and prevent continual discharge.

- Step 2: Source Tracking Determination - If the discharge has ceased, it may be difficult to track the source. The investigator will survey the tributary area to locate evidence in order to initiate a source investigation.

- Step 3: Source Tracking - The investigator will utilize all resources including storm drain system maps, monitoring results, and observations to track and identify the source.

- Step 4: Discharge Elimination - Once the source is identified, the responsible Authority staff or airport tenant personnel will be notified to terminate and clean up the discharge.

- Step 5: Damage Assessment - The Authority will assess the damage to resources downstream and require the appropriate remediation.

- Step 6: Reporting - Based on the type of discharge and damage assessment, the Authority will notify the RWQCB immediately and / or the incident will be documented in the Annual Report submitted to the RWQCB as required by the Municipal Permit.

9.5.2 DOCUMENTATION AND SAMPLING

Source investigation should be documented using photographs, detailed notes on observations, completed field observation sheets when applicable, discussions or decisions made, and other information relevant to the investigation. This information could be useful to future investigations and possible future resolution of illicit discharges for which sources were unidentified. Documentation is also used in support of enforcement actions.

Sampling for field screening or laboratory analysis should be done when deemed appropriate by the investigator. In many cases, once the source is identified, the particulars of situation surrounding the illicit discharge can be determined by a survey of the source and analysis may not be necessary. However, in other cases, analysis of samples may be evidence to support enforcement actions.

All documentation and other information relevant to source investigations should be collected by or be turned over to the Authority Environmental Affairs Department. The department will handle, retain, and track files pertaining to the various illicit discharge investigations, whether or not a responsible party has been identified.

Follow-up investigations are typically conducted by the Authority under the following circumstances:

- The discharge ceased prior to arriving at the point of observation or during a source investigation , and without the discharge, the source could not be traced at that time;
- Source investigations did not produce enough information to locate the source or provide enough evidence to identify a responsible party;
- An order was issued by the Authority to a responsible party and a follow-up investigation is necessary to ensure that the responsible party has complied with the required abatement actions;
- An area or activity is identified as having a high potential for the occurrence of an illicit discharge and, therefore, periodic follow-up visits will ensure that future discharges are rapidly identified and eliminated.

9.5.3 ENFORCEMENT

The Authority employs several enforcement mechanisms and penalties to ensure compliance with its ordinances. Enforcement procedures are described in Section 2.0.

9.6 ILLICIT DISCHARGE DETECTION AND ELIMINATION COMPONENT EFFECTIVENESS ASSESSMENT

The Authority has developed internal and external effectiveness assessment programs to evaluate the Authority staff, Authority boards, and tenant compliance with water quality issues. The Authority's Effectiveness Assessment component is described in Section 13.0 of this document.

9.7 ILLICIT DISCHARGE DETECTION AND ELIMINATION COMPONENT PROGRAM REVIEW AND MODIFICATION

The Authority has reserved this section to identify and document future changes to the Illicit Discharge Detection And Elimination Component of the SWMP. Section 14.0 of this SWMP details the program modifications made to the *SWMP January 2005-Revision* to bring this document into compliance with the renewed Municipal Permit.