

Illicit Discharge Detection and Elimination (IDDE) Procedures



City of Fairfax, Virginia
Public Works – Stormwater
10455 Armstrong Street, Room 200
Fairfax, VA 22030

Version 11/2022



Updated By:
GKY & Associates, Inc.
4229 Lafayette Center Drive
Suite 1850
Chantilly, VA 20151

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1. Introduction

The following *Illicit Discharge Detection & Elimination (IDDE) Procedures* are intended to provide staff and contractors of the City of Fairfax (City) with guidance for conducting detection, investigation, and elimination of illicit discharges to comply with the City's coverage under the General VPDES Permit For Discharges of Stormwater From Small Municipal Separate Storm Sewer Systems (MS4), VAR040064 (MS4 General Permit). The current MS4 General Permit (effective November 1, 2018 - October 31, 2023) mandates that the City prohibit unauthorized non-stormwater discharges into the City's MS4 and develops, implements, and maintains updated procedures to enforce the prohibition effectively.

2. Permit Requirements

As defined in *Part I E.3.c* of the MS4 General Permit, the City is required to *"maintain, implement, and enforce illicit discharge detection and elimination (IDDE) written procedures designed to detect, identify, and address unauthorized non-stormwater discharges, including illegal dumping, to the small MS4 to effectively eliminate the unauthorized discharge."*

The IDDE written procedures shall include the following:

1. *A description of the legal authorities, policies, standard operating procedures, or other legal mechanisms available to the permittee to eliminate identified sources of ongoing illicit discharges including procedures for using legal enforcement authorities.*
2. *Dry weather field screening protocols to detect, identify, and eliminate illicit discharges to the MS4. The protocol shall include:*
 - a. *A prioritized schedule of field screening activities and rationale for prioritization determined by the permittee based on such criteria as age of the infrastructure, land use, historical illegal discharges, dumping or cross connections;*
 - b. *If the total number of MS4 outfalls is equal to or less than 50, a schedule to screen all outfalls annually;*
 - c. *If the total number of MS4 outfalls is greater than 50, a schedule to screen a minimum of 50 outfalls annually such that no more than 50% are screened in the previous 12-month period. The 50% criteria is not applicable if all outfalls have been screened in the previous three years; and*
 - d. *A mechanism to track the following information:*
 1. *The unique outfall identifier;*
 2. *Time since the last precipitation event;*
 3. *The estimated quantity of the last precipitation event;*
 4. *Site descriptions (e.g., conveyance type and dominant watershed land uses);*
 5. *Whether or not a discharge was observed; and If a discharge was observed, the estimated discharge rate (e.g., width and depth of discharge flow rate) and visual characteristics of the discharge (e.g., odor, color, clarity, floatables, deposits or stains, vegetation condition, structural condition, and biology).*
3. *A timeframe upon which to conduct an investigation to identify and locate the source of any observed unauthorized non-stormwater discharge. Priority of investigations shall be given to discharges of sanitary sewage and those believed to be a risk to human health and public safety. Discharges authorized under a separate VPDES or state permit require no further action under this permit.*
4. *Methodologies to determine the source of all illicit discharges. If the permittee is unable to identify the source of an illicit discharge within six months of beginning the investigation then the permittee shall document that the source remains unidentified. If the observed*

- discharge is intermittent, the permittee shall document that attempts to observe the discharge flowing were unsuccessful.*
5. *Methodologies for conducting a follow-up investigation for illicit discharges that are continuous or that permittees expect to occur more frequently than a one-time discharge to verify that the discharge has been eliminated except as provided for in Part I E 3 c (4).*
 6. *A mechanism to track all illicit discharge investigations to document the following:*
 - a. *The dates that the illicit discharge was initially observed, reported, or both;*
 - b. *The results of the investigation, including the source, if identified;*
 - c. *Any follow-up to the investigation;*
 - d. *Resolution of the investigation; and*
 - e. *The date that the investigation was closed.*

3. Legal Authority

The City's Zoning Ordinance, Chapter 110, Article 4.16.7.I. *prohibits "any person to discharge to or allow the discharge to the City's Municipal Separate Storm Sewer System any substance not composed entirely of stormwater"* while exempting the following activities:

- Discharges authorized by a valid national pollutant discharge elimination system (NPDES) permit, waiver or discharge order, a Virginia pollutant discharge elimination system (VPDES) permit, waiver or discharge order, or a Virginia pollution abatement (VPA) permit;
- Discharges from firefighting, other life-saving activities or training related to those activities;
- Discharges specified in writing by the City as necessary for public health and safety;
- Any activity by a governmental entity in accordance with federal, state, and local regulations and standards for the maintenance or repair of drinking water reservoirs or drinking water treatment or distribution systems;
- Any activity by the City, its employees and agents, in accordance with federal, state, and local regulations and standards, for the maintenance of any component of its stormwater management system;
- Dye testing provided verbal notification to the City before the time of the test;
- Diverting stream flows or rising groundwater, or infiltration of uncontained groundwater;
- Pumping of uncontaminated groundwater from potable water sources, foundation drains, irrigation waters, springs, or water from crawl spaces or footing drains;
- Water line flushing;
- Landscape irrigation, including watering of lawns;
- Air conditioning condensate;
- Individual car washing on residential properties;
- Swimming pool water provided that it has been de-chlorinated to the satisfaction of the VSMP administrator or designee; and
- Incidental water from street and parking lot sweeping operations.

Table 1 on the following page provides examples of Potential Illicit Discharges.

Article 4.16.7.I. also provides the City the authority to investigate and monitor potential unauthorized discharges and the necessary authorities, including legal procedures and penalties, to enforce the prohibition of illicit discharges into the City's MS4.

Table 1. Potential Illicit Discharges

Potential Illicit Discharges	
Trash or debris	Swimming pool filter backwash
Construction materials	Chlorine, bromine, or other disinfectants
Pesticides, herbicides, or fertilizers	Heated water
Antifreeze or other vehicle products	Domestic animal waste
Metals (particulate or dissolved)	Sewage
Flammable or explosive materials	Recreational vehicle waste
Radioactive material	Animal carcasses
Batteries	Food wastes
Acids, alkalis, or bases	Bark or other fibrous materials
Paints, stains, resins, lacquers, or varnishes	Lawn clippings, leaves, or branches
Degreasers and/or solvents	Silt, sediment, concrete, cement, or gravel
Drain cleaners	Dyes
Petroleum products (oil, gasoline, grease, fuel oil, heating oil, etc.)	Chemicals, including suspected metals, not normally found in uncontaminated water
Steam cleaning wastes	Process-associated discharges
Soaps, detergents, or ammonia	Hazardous material or waste not listed above

4. Reporting Illicit Discharges

The City provides numerous mechanisms for City staff, its contractors, and the general public to report suspected illicit discharges. Discharges or spills that appear to be hazardous or dangerous in nature (i.e., petroleum products such as gas, oils, and hydraulic fluids and chemical products such as acids or pesticides) are to be immediately referred to the City Fire Department. Otherwise, potential illicit discharges can be reported using one of the following mechanisms:

- The City's Resolve Online Reporting System:
(<https://www.fairfaxva.gov/government/information-technology/fairfax-city-resolve>)
- The Reporting Illicit Discharges web page:
(<https://www.fairfaxva.gov/government/public-works/stormwater-and-floodplain-management/reporting-illicit-discharges>)
- Direct contact of one of the following City officials:
 - Stormwater Program Manager
 - Phone: 703-273-6073
 - Email: Satoshi.Eto@fairfaxva.gov
 - Fire Marshal
 - Phone: 703-385-7830 (8:30 AM to 5:00 PM, weekdays)
 - The Fire Marshal's Office shall respond to all spills and issues regarding code compliance.
 - Police Department
 - Phone: 703-385-7924 (after hours and on weekends or holidays)

5. Investigating Illicit Discharges

The City Fire Department is responsible for emergency responses to discharges or spills that appear to be hazardous or dangerous in nature as previously described in **Section 4**. Necessary follow-up and

investigations are coordinated between the Fire Marshal's Office and the Department of Public Works Stormwater and Floodplain Management (DPW-SFM).

The City's goal is to investigate such potential illicit discharges within three (3) business days of receipt with priority given to discharges of sanitary sewage and those believed to be a risk to human health and public safety as required by the MS4 General Permit. Based on the information reported, investigations should be conducted in one of the following manners:

1. **Storm Network Investigations:** This isolates the discharge to a specific section of the drainage network through strategic manhole inspections. Inspectors should follow the direction of flow through the storm sewer system, moving systematically upstream starting at the outfall or structure where an illicit discharge has been identified until the source location is identified. Flow rate, color, odor, and presence of floatable materials, deposits, or stains should be documented. Inspectors should not enter any storm sewer structure unless properly equipped, and the required approval for confined space entry has been attained.
2. **Drainage Area Investigations:** Inspectors should survey the drainage area where the discharge is located. This method is useful when the discharge has distinct or unique characteristics that can be linked to a specific business or operation. Drainage Area Investigations can include:
 - Drive-by surveys of the drainage area to locate possible generating sites; and/or
 - GIS analysis to identify potential properties with septic systems, industrial and other potential generating sites.

Fire Department staff conducting the investigation utilize a Fire Marshal's Incident Report to document the findings and results of each investigation. DPW-SFM staff conducting the investigation utilize the separate Illicit Discharge Investigation Form (**Appendix A**) to document the findings and results of each investigation. At a minimum, the following must be recorded for each potential illicit discharge reported and investigated:

- The date(s) that the potential illicit discharge was initially observed, reported (or both);
- The results of the investigation, including:
 - The source, if identified;
 - Any follow-up to the investigation;
 - The resolution of the investigation; and
 - The date the investigation was closed.

During follow-up investigations, the following observations shall be recorded, when applicable: location; time; date; the name of the observer; the presence of flow; odors; color and presence of sheen; the presence of floatables; stains/algae; and vegetative conditions. In addition to visual observation and documentation on the Illicit Discharge Investigation Form, photo-documentation of each suspected discharge shall also be recorded, whenever possible. If the potential illicit discharge is determined to be intermittent, separate attempts to observe the active discharge must be made and documented via a separate Illicit Discharge Investigation Form.

Once City staff identifies the source of the potential illicit discharge, a determination must be made regarding whether it is an authorized or illicit discharge. Records of identified authorized discharges are to be recorded on the Illicit Discharge Investigation Form. Illicit discharges are to be eliminated following the procedures outlined in **Section 5.1**.

NOTE: Per the MS4 General Permit, illicit discharges that enter or are expected to enter surface water (e.g., stream, wetland, reservoir) must be reported to the Department of Environmental Quality (DEQ)

within 24 hours of their discovery. Coordination should be made with the Stormwater Program Manager to ensure this reporting requirement is met.

5.1 Eliminating Illicit Discharges

Upon identification of the source of an illicit discharge, DPW-SWM staff should choose the appropriate option of the following to ensure implementation to ensure illicit discharge elimination:

- **Hazardous and Other Materials Believed to be a Risk to Public Health and Safety**
Illicit discharges identified as hazardous or a potential risk to human health and public safety should be immediately referred to the City Fire Department and the Fire Marshal's office for their emergency response and employment of appropriate spill response measures. The date and time of the referral should be documented on the Fire Marshal's Incident Report Form.
- **Sanitary Sewage**
Illicit discharges originating from the sanitary sewer system (both public and private) should immediately be referred to the DPW Division of Wastewater Services by calling (703) 385-7810 during business hours and (703) 385-7924 after hours. The date and time of the referral is provided to DPW-SFM and subsequently documented on the Illicit Discharge Investigation Form.
- **Public Water Supplies**
Discharges of potable water from public water main breaks should be reported to Fairfax Water by completing their online notification form found at <https://fwnotifications.org/public/contact/>, emailing them at watermainbreak@fairfaxwater.org, or calling them at (703) 698-5613. The date and time of the referral should be documented on the Illicit Discharge Investigation form.
- **Illicit Discharges Originating from City Projects or Properties**
When the source of the illicit discharge is found to be the City (originating from either a City project or property, the DPW-SFM investigator should coordinate with the appropriate site/facility manager to immediately cease the operation causing the illicit discharge and to implement the necessary remedial efforts to prevent additional discharge migration and minimize its impact. Concurrently, the DPW-SFM investigator must report the findings to the Stormwater Program Manager to notify appropriate City supervisors. The date and time that the illicit discharge is eliminated and the efforts completed by the City or its contractors should be documented on the Illicit Discharge Investigation Form.
- **Illicit Discharges Originating from Private Projects or Properties**
Property owners must be provided a written warning specifying the particulars of the violation and requesting immediate investigation and resolution of the manner. Note: If delivery of a written warning is not immediate, DPW-SFM investigators should verbally recommend that the activities causing the illicit discharge to be immediately ceased and any necessary remedial action be initiated to minimize potential damage to downstream infrastructure. The City's Zoning Ordinance, Chapter 110, Article 4.16.7.I., outlines the formal enforcement activities available to the City if a resolution cannot be reached. The DPW-SFM investigators should also coordinate with other appropriate agencies when necessary to ensure the elimination of the illicit discharge. Examples of coordination include:
 - The Fire Marshal's Office should be contacted if the illicit discharge source may also violate the Fire Prevention Code or other health and safety requirements.
 - The Zoning Administration Division should be contacted if the illicit discharge source may also violate other sections of the City Zoning Code.
 - The VSMP inspector should be contacted if the illicit discharge source is an approved land disturbance activity.

- Codes administration should be contacted if the illicit discharge source is a code violation such as a violation of a street-cutting permit.
- The actions undertaken by the City and the responsible party should be documented on the Illicit Discharge Investigation Form.

If a potential illicit discharge is reported and the initial investigation fails to locate the illicit discharge or the illicit discharge stops and its source cannot be identified, the activities completed as part of the investigation should be documented on an Illicit Discharge Investigation Form and the investigation should be considered closed. If it is determined the potential illicit discharge is intermittent in nature, the DPW-SFM investigators should attempt to observe the active discharge and identify the source by conducting additional investigations with each investigation documented using a separate Illicit Discharge Investigation Form. If the active discharge or its source is not located within six months, the illicit discharge investigation should be closed. If the discharge is reported after such time, a new investigation should be opened.

6. Dry Weather Screening

The MS4 General Permit requires the City to annually conduct dry weather¹ screening of a minimum of fifty (50) City MS4 outfalls as another means of identifying illicit discharges. MS4 outfalls are located either 1) where the MS4 discharges directly into a State surface water, such as Accotink Creek, or 2) at the point of discharge where the MS4 discharges into another storm sewer system that is not owned or operated by the City (i.e., private, George Mason University, VDOT, or County operated). The City maintains an updated MS4 outfall inventory that includes the following information for each MS4 outfall, as required by the MS4 General Permit:

1. A unique identifier for each mapped item required in Part I E 3; (a) A unique identifier as specified on the storm sewer system map;
2. The latitude and longitude of the outfall or point of discharge;
3. The estimated regulated acreage draining to the outfall or point of discharge;
4. The name of the receiving water;
5. The 6th Order Hydrologic Unit Code of the receiving water;
6. An indication as to whether the receiving water is listed as impaired in Virginia
7. 2016 305(b)/303(d) Water Quality Assessment Integrated Report;
8. The predominant land use for each outfall discharging to an impaired water;
9. The name of any EPA-approved TMDLs for which the permittee is assigned a wasteload allocation; and

New stormwater infrastructure is mapped as new development and redevelopment occurs and adds it to the City's existing inventory no later than October 1 of each year.

The City has developed and annually implements the following protocol to conduct dry weather screening of its MS4 outfalls. The protocol is designed to allow City staff, or its contractors, to assess the physical condition of its MS4 outfalls while identifying suspect flows for follow-up investigation.

¹ Dry Weather is defined as a period in which there has been recorded less than 0.10 inch of rainfall within the preceding 48 hours.

6.1 Selection of MS4 Outfalls for Annual Dry Weather Screening

To assure that the dry weather screening is completed in a prioritized manner that also provides that all MS4 outfalls are inspected, the following factors will be applied, in the set order, to identify the 50 MS4 outfalls to be screened in each given year:

1. **Date of last screening** – The date of last screening should be utilized to ensure that no more than 50 % of the outfalls were screened in the previous 12-month period.
2. **Number and severity of past illicit discharges** – MS4 outfalls with a history of illicit discharges should be prioritized over those that do not.
3. **Geographic distribution (i.e., clusters)** – To improve efficiency, MS4 outfalls that are closer to one another should be selected over ones farther apart.
4. **Drainage Area** – MS4 outfalls with larger drainage areas should be selected over ones with smaller drainage areas to cover a greater percentage of the overall City.
5. **Land Use (i.e., industrial, commercial, multi-family, single-family)** – MS4 outfalls serving industrial and commercial land uses should be prioritized over residential land use.

6.2 Identifying Qualifying Dry Weather Days

The determination of dry weather days will be made by using the National Weather Service website for the Washington Dulles International Airport (<https://w1.weather.gov/data/obhistory/KIAD.html>) to review the precipitation history from the prior three days. To qualify as a dry weather day, the sum of the total rainfall over the previous 48 hours must be less than 0.1 inches. If the sum of the total rainfall over the previous 48-hrs. is 0.1-inch or greater, the day does not qualify as dry and field screening cannot be completed that day.

6.3 Conducting Dry Weather Screening

The annual dry weather screening process requires that a visual inspection be completed at each of the selected MS4 outfalls. Documentation of each visual inspection should be recorded using the Illicit Discharge Field Inspection Form (**Appendix B**). The collected data should be supplemented by taking at a minimum a photo of the front of the outfall and a photo looking downstream of the outfall. The general outfall information (Items 1-12) and the Area Reconnaissance (Items 13-19) section must be completed for all MS4 outfalls. For MS4 Outfalls where flow is present, field staff must also complete the Flow Description (Items 20-26) and Water Quality Grab Sample (Items 27-32) sections to characterize the flow conditions. For parameters rated characterized using the relative Severity Index, field staff must employ best professional judgment (BPJ) to assign a rating ranging from (1) to (3), with (1) indicating no visual evidence of potential illicit discharge and (3) indicating obvious signs of potential illicit discharge activity. For additional assistance, field staff should refer to the *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*² found at <https://www3.epa.gov/npdes/pubs/iddmanualwithappendices.pdf>. Field staff must also conduct and document the results of field monitoring for the Water Quality Grab Sample parameters. Field staff must follow the directions included with the sampling equipment.

² Brown, Edward, Deb Caraco, and Robert Pitt. *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*; Water Permits Division, US EPA Office of Water and Wastewater, Washington, D.C., 2004

Note: If an MS4 outfall cannot be safely accessed or located, the field crews must still complete an Illicit Discharge Field Inspection Form and document that the attempt was made to conduct the field screening.

6.4 Analyzing Dry Weather Screening Results

Screening results for individual MS4 outfalls must be evaluated against the established passing benchmarks in **Table 2** to classify each MS4 outfall into one (1) of five (5) categories: 1) Obvious, 2) Suspect, 3) Potential, 4) Unlikely, and 5) Not Screened.

The criteria for categorizing individual MS4 outfalls are outlined in **Table 3**.

Table 2. Water Quality Parameter Benchmarks

Indicator Parameter	Method	Unit	Passing Benchmark ^{3,4}
Area Reconnaissance (Outfall Inspection Form Fields 15-17)			
Vegetation	Severity Index	Score 1 to 3	1
Trash	Severity Index	Score 1 to 3	1
Deposits or Stain	Severity Index	Score 1 to 3	1 ⁵
Flow Description (Outfall Inspection Form Fields 21-25)			
Water Color	Severity Index	Score 1 to 3	1
Transparency	Severity Index	Score 1 to 3	1
Oily Sheen	Severity Index	Score 1 to 3	1
Odor	Severity Index	Score 1 to 3	1
Biology	Severity Index	Score 1 to 3	1
Floating Matter	Severity Index	Score 1 to 3	1
Water Quality Grab Sample (Outfall Inspection Form Fields 27-32)			
Temperature	Individual Sample	°F	BPJ
Conductivity	Individual Sample	µS/cm	<500
Total Chlorine	Individual Sample	mg/L	0.1
Ammonia	Individual Sample	mg/L	0.74 ⁶
pH	Individual Sample	SU	6-9
Turbidity	Individual Sample	NTU	<50

³ Benchmarks are based on those established in the Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments and have been slightly revised to account for local conditions.

⁴ Using Best Professional Judgment (BPJ), Field observations of visual indicators are rated by the relative severity using a scale from 1 to 3 as outlined in the EPA publication, "Illicit Discharge and Elimination: A Guidance Manual." October 2004; 1 indicating no visual evidence of potential illicit discharge, and 3 indicating obvious signs of potential illicit discharge activity.

⁵ Stains often result from the oxidation of iron (red) and manganese (black) found in groundwater. These stains will be noted but will not be used alone to identify an outfall as suspected of having an illicit discharge.

⁶ Maximum reading of common monitoring equipment such as Oakton Multi-Parameter PCS TestrTM35, Hach Colorimeter, etc.

Table 3. Outfall Category Designation Criteria

Outfall Category	Criteria
Obvious	Flow Present.
	AND
	Presence of visible and measurable indicators.
	AND
	The source of flow is observed as unauthorized non-stormwater discharge.
Suspect	Flow may or may not be present.
	AND ONE OF THE FOLLOWING:
	Unknown flow originating from a location that would be expected to have pollutants (i.e., carwash or pool).
	OR
	Strong and obvious physical indicator(s) of an illicit discharge but no active discharge (i.e., concrete slurry in the bottom of the outfall pipe).
	OR
	Significant exceedance of one or more water quality indicators or show possible evidence of illicit discharge.
Potential	Flow may or may not be present.
	Slight exceedances of up to two water quality indicators but no other indicators of an illicit discharge.
	OR
	Flow that originates from an unknown/unmapped source with no physical indicators originating from an area that would not be expected to have pollutants (i.e., residential/roof drains).
	OR
	Evidence of a previous illicit discharge, such as staining.
	OR
	Physical indicators such as algal mats or brown algae downstream of outfall without a discernable upstream source of indicator of an illicit discharge.
	OR
	Significant trash, sediment, or debris.
Unlikely	Flow is not present (including if the outfall is submerged but the flow is not present at the upstream node)
	OR
	Flow is determined to be an authorized discharge
Not Screened	The MS4 Outfall could not be accessed safely.
	OR
	The MS4 Outfall could not be located.

6.5 Investigating Dry Weather Screening Results

Follow-up investigation of the dry weather screening results depends upon the individual MS4 outfall category. Follow-up requirements for each category are included in **Figure 1**.

Obvious/Suspect	• Follow-up as soon as practicable in accordance with Section 5 • Conduct follow-up field screening during next screening period
Potential	• Follow-up in accordance with Section 5 • Prioritize follow-up field screening during next screening period
Unlikely	• No follow-up is required • No prioritization for future screening periods is required
Not Screened	• Provide reasoning for not conducting field screening • Develop alternative protocol (e.g., screen upstream node) • Prioritize above MS4 Outfalls rated "Unlikely"

Figure 1. Dry Weather Field Screening Follow-Up Requirements Based on MS4 Outfall Category

7. Documenting and Keeping Records Regarding the IDDE Program

The DPW-SFD is responsible for maintaining all records regarding the illicit discharge program. This includes:

- A map of the MS4 system that complies with the most recent MS4 General Permit and contains the necessary data fields;
- Documentation that the City has notified downstream MS4 operators of any physically interconnected MS4s into which the City's MS4 discharges;
- These written procedures for identifying, investigating, and eliminating illicit discharges and for conducting dry weather screening;
- Records of any reported potential illicit discharges, the City's response, follow-up actions, and investigation closure date;
- Copies of completed Illicit Discharge Field Investigation forms for all illicit discharge investigations; and
- Copies of the completed Illicit Discharge Field Inspection Forms.

Records must be kept, at a minimum, for the duration of the MS4 General Permit term.

8. Annual Reporting

DPW-SFM is responsible for providing the information regarding the IDDE in the MS4 Annual Report that must be submitted to DEQ. The required information can be found in the current MS4 General Permit.

Appendix A

Illicit Discharge Investigation Form

Page A2

Appendix B

Illicit Discharge Field Inspection Form

ILLICIT DISCHARGE FIELD INSPECTION FORM

City of Fairfax, Virginia

1. Inspection Date:	3. Node ID: CH06
2. Inspectors:	4. Downstream Node ID:
	5. Upstream Node ID:
6. Rainfall within previous 48 hours (in)?	

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7. Node Location:	Lat:		Address:	
	Long:			
8. Node Type				
9. Node Material		10. Node Size		
11. Node Condition		12. Pipe Condition		

Area Reconnaissance	
13. Receiving Channel Type?	
14. Receiving Channel Condition?	
15. Vegetation?	
16. Trash?	
17. Deposits or stains?	
18. Is there flow?	
19. Comments:	

Flow Description	
20. Velocity (cfs)?	N/A
21. Water Color?	N/A
22. Transparency?	N/A
23. Oily Sheen?	N/A
24. Odor?	N/A
25. Floating Matter?	N/A
26. Comments:	

Water Quality Grab Sample	Method			Pass Criteria	
27. Temperature:	N/A	°F	OAKTON Multi-Parameter PCSTestr™ 35	BPJ*	N/A
28. Conductivity:	N/A	µS/cm	OAKTON Multi-Parameter PCSTestr™ 35	<500 µS/cm	N/A
29. Total Chlorine Test:	N/A	mg/L	Hach Colorimeter	<0.1 mg/L	N/A
30. Ammonia Test:	N/A	mg/L	Hach Colorimeter	<1.0 mg/L	N/A
31. pH:	N/A	S.U	OAKTON Multi-Parameter PCSTestr™ 35	6.0-9.0 S.U	N/A
32. Turbidity Test:	N/A	NTU	Hach Colorimeter	<50 NTU	N/A

* Pass criteria determined to be <75° F using best professional judgment (BPJ) based on the urban density and ambient air temperature.

If any information entered in the spaces above indicate evidence of illicit discharge, mark "Suspect" at the top of page; otherwise mark "Clear"

33. Photographs		
	Picture Number:	Description: