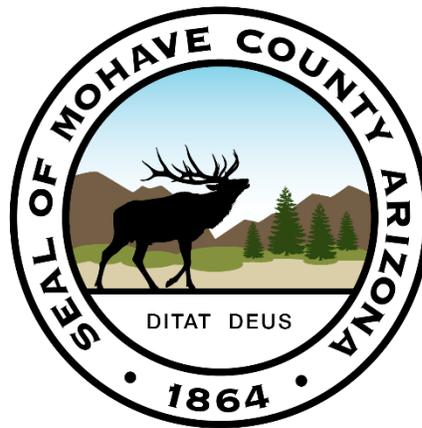


# ILLICIT DISCHARGE DETECTION AND ELIMINATION PROGRAM FOR MOHAVE COUNTY, ARIZONA

In fulfillment of the requirements associated with  
Small Municipal Separate Storm Sewer System (MS4)  
General Permit (AZG2016-002)

**Prepared:**  
August 2017

**Updated:**



Mohave County:  
Development Services Department  
Public Works Department  
Flood Control District

# Certification Statement

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**Permit Number:** AZG2016-002

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*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for false information, including the possibility of fine and imprisonment for knowing violations.*

\_\_\_\_\_  
Timothy M. Walsh, P.E. – Director  
Mohave County Development Services

\_\_\_\_\_  
Date

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Mohave County Public Works

\_\_\_\_\_  
Date

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# Glossary of Acronyms

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A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
A.R.S.	Arizona Revised Statute
AZPDES	Arizona Pollution Discharge Elimination System
BMP(s)	Best Management Practices
CFR	Code of Federal Regulations
CGP	Construction General Permit
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
E.R.A.C.E.	Environmental Rural Area Cleanup Enforcement
GIS	Geographical Information System
GHKP	Good Housekeeping Plan
ID	Illicit Discharge
IDDE	Illicit Discharge Detection and Elimination
IW	Impaired Waters
MCM	Minimum Control Measures
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer Systems
MSGP	Multi-Sector General Permit (non-mining)
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollution Discharge Elimination System
OAW	Outstanding Arizona Water
PCSP	Post-Construction Stormwater Plan
POTW	Public Owned Treatment Works
SMO	Stormwater Management Ordinance
SWMP	Stormwater Management Plan
SS-SWMP	Site Specific Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
TMDL	Total Maximum Daily Load



# Glossary of Commonly Used Terms

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**Action Plan:** A series of steps to be initiated by the inspecting department outlining the course of action for addressing a finding of illicit discharge. The steps could include maintenance and clean up measures, tracking the source of the illicit discharge, issuing a Notice of Violation, Cease and Desist Order or pursuing civil or criminal proceedings described in the Stormwater Management Ordinance.

**Best Management Practice(s):** Methods, measures or practices to prevent or reduce discharges and includes both structural and nonstructural controls and operation and maintenance procedures.

**Discharge Monitoring Report:** A document, outside of the Annual Report, that is used to report all monitoring results to ADEQ.

**Facility:** Any “point source” or any other facility (including land or appurtenances thereto) that is subject to regulation under the AZDES/NPDES program.

**Illicit Discharge:** Any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges pursuant to a AZPDES/NPDES permit.

**Impaired water:** Waters that have been assessed by ADEQ, under the Clean Water Act, as not attaining a water quality standard for at least one (1) designated use and are listed in Arizona’s current 303(d) list or on the 305(b) Category 4 List.

**Mohave County MS4:** A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) which are owned and operated by Mohave County, discharge into waters of the United States, and are designed or used for collecting or conveying stormwater, but are not part of a combined sewer system and are not part of a publically-owned treatment works (POTW).

**Not Attaining Water:** A surface water that has been determined to be impaired but is not placed on Arizona’s 303(d) list.

**Outfall:** A point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges into waters of the United States. Outfall does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect the same stream or other waters of the United States and are used to convey waters of the United States.

**Outstanding Arizona Water:** A surface water that has been designated by ADEQ as an outstanding state resource under A.A.C R18-11-112.

**Point Source:** Any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collections system, vessel or other floating craft from which pollutants are or may be discharged, excluding return flows from irrigated agriculture or agriculture stormwater runoff.



**Pollutant:** Sediment, fluids, toxic waste, dredged spoil, solid waste, substances and chemicals, pesticides, herbicides, fertilizers, and other agricultural chemicals, incinerator residue, sewage, garbage, sewage sludge, munitions, petroleum products, equipment, rock, sand, cellar dirt (e.g., overburden material) and mining, industrial, municipal and agricultural waste or any other liquid, solid, gaseous or hazardous substance which has the capacity to degrade water quality.

**Receiving Water:** Waters of the United States, as defined by 40 CFR 122.2. Also referred to as Navigable Waters.



## Introduction and Background

On September 30, 2016, Arizona Department of Environmental Quality (ADEQ), as part of the National Pollution Discharge Elimination System (NPDES) permit, reissued Arizona Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Storm Sewer Systems (AZG2016-002). The goal of the permit is to reduce, to the maximum extent practicable, pollutants introduced into the waters of the United States.

While previous issuances of the permit did not require Mohave County to apply for coverage, the latest version of the permit does. The need for coverage results from the 2010 Decennial Census. The Census determined that the unincorporated areas of Mohave County adjacent to Lake Havasu City had sufficient population density to be designated as “urbanized areas” and, by extension, would operate a small municipal separate storm sewer system (MS4). It is the operation of an MS4 within a designated “urbanized area” that places Mohave County under the jurisdiction of the permit.

As part of the requirements associated with operating an MS4, Mohave County must create a Stormwater Management Program. This program uses six minimum control measures to achieve the goal of the AZG2016-002. The six minimum control measures (MCM) are as follows.

1. Public Education and Outreach
2. Public Involvement and Participation
3. **Illicit Discharge Detection and Elimination**
4. Construction Activity Stormwater Runoff Control
5. Post-Construction Stormwater Management in New Development and Redevelopment.
6. Pollution Prevention/Good Housekeeping for Municipal Operations

This document addresses the requirements associated with MCM 3. It is designed to provide the written procedures to systematically find and eliminate sources of non-stormwater to its MS4 and to implement procedures to prevent illicit connections and discharges.

## Urbanized Area - Geographical Limits

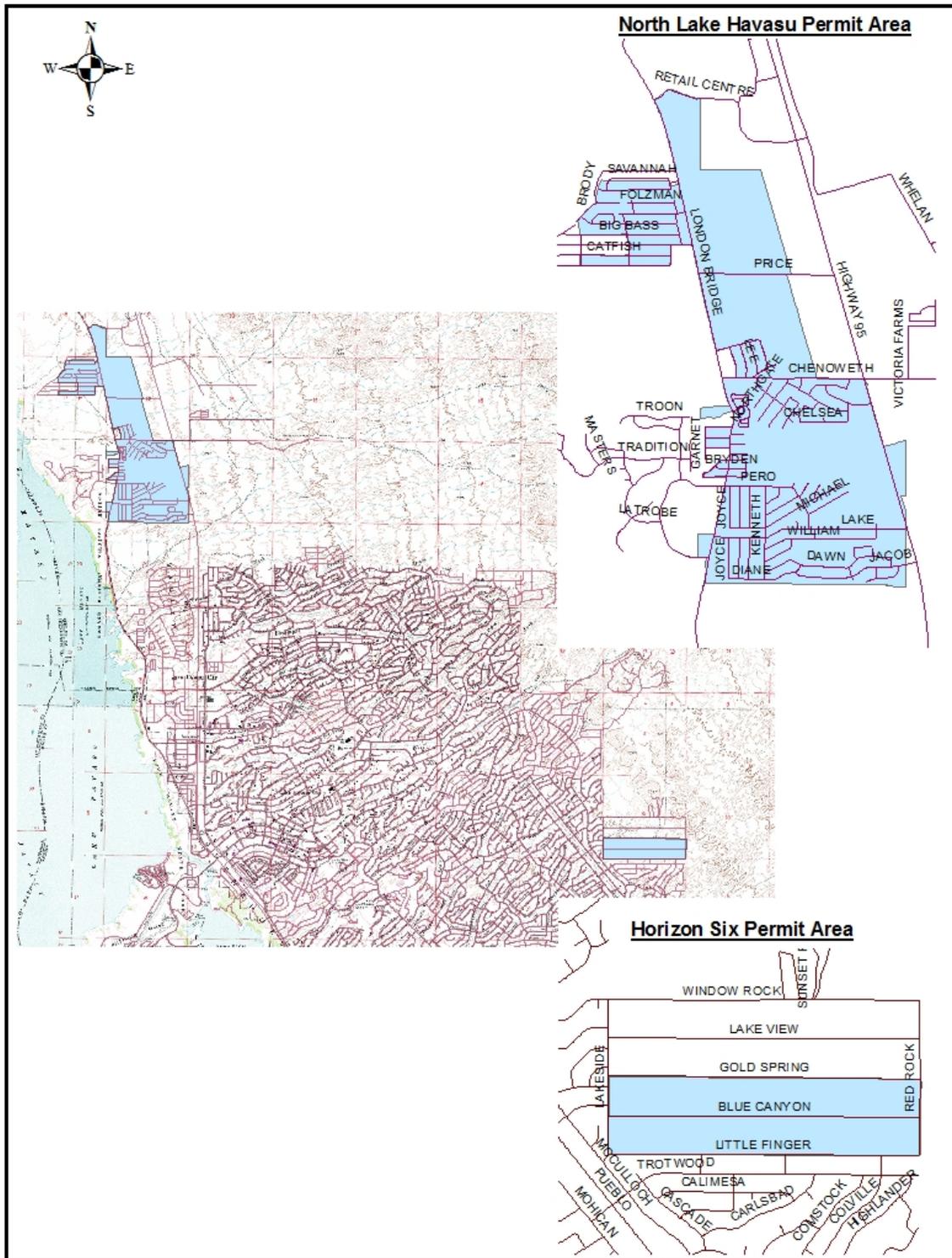
The eligible areas that make up the MS4 for Mohave County lie outside the incorporated limits of Lake Havasu City, within the Colorado River – Lower Gila Watershed. The MS4 area consists of portions of Sections 8, 16, 17 & 21 of Township 14 N Range 20 W and Section 9, Township 13 N Range 19 W of the Salt and Gila River Base and Meridian, Mohave County, Arizona. The MS4 areas are depicted on Figure 1: Permit Areas within Unincorporated Mohave County.

## Receiving Waters

The receiving waters, often referred to as waters of the United States and/or navigable water associated with Mohave County’s MS4 are Lake Havasu and the Colorado River. The receiving waters are identified on Figure 1: Permit Areas within Unincorporated Mohave County. It should be noted that none of the receiving waters have been designated as impaired, not attaining waters, or Arizona Outstanding Waters.



Figure 1: Permit Areas within Unincorporated Mohave County

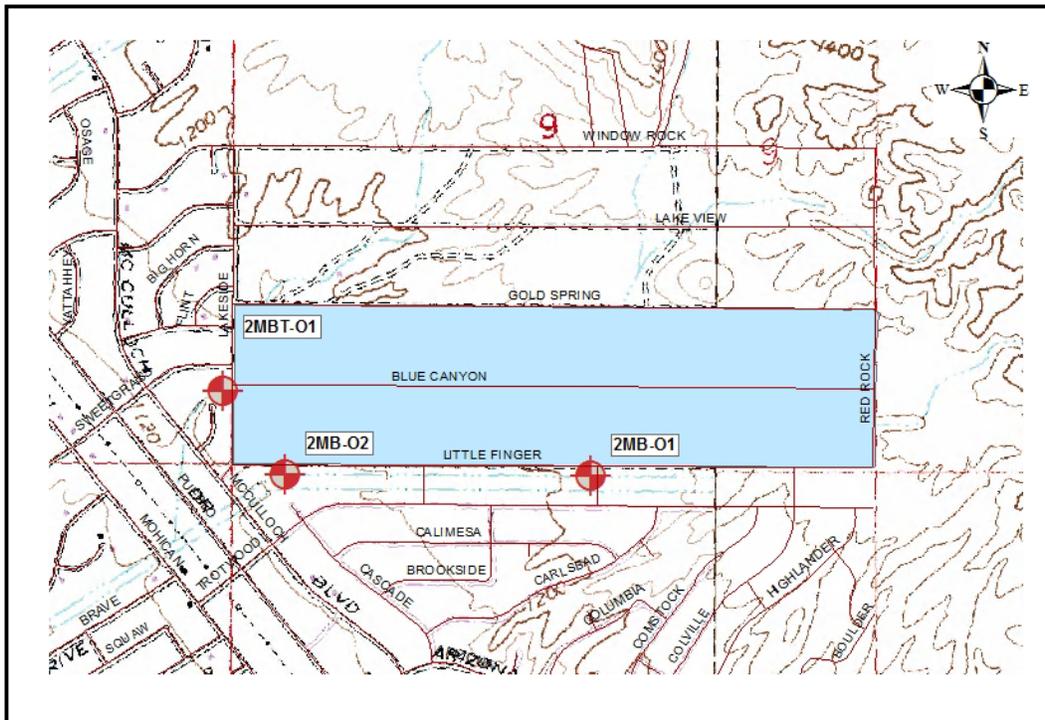


# IDDE Outfalls

<u>Permit Region</u>	<u>NAME</u>	<u>MAP ID</u>
Horizon Six	Mockingbird Channel	2MB-O1
Horizon Six	Unnamed Tributary to Mockingbird Channel	2MBT-O1
Horizon Six	Mockingbird Channel	2MB-O2
North Lake Havasu	Unnamed Wash 1	1UW1-O1
North Lake Havasu	Unnamed Wash 2	1UW2-O1
North Lake Havasu	Unnamed Wash 3	1UW3-O1
North Lake Havasu	Unnamed Wash 4	1UW4-O1
North Lake Havasu	Unnamed Wash 5	1UW5-O1
North Lake Havasu	Unnamed Wash 6	1UW6-O1
North Lake Havasu	Unnamed Wash 7	1UW7-O1

Maps identifying the location of the outfalls are provided on Figure 2a: Horizon Six Outfall Locations and 2b: Lake Havasu Outfall Locations.

**Figure 2a: Horizon Six Outfall Locations**





## Non-Stormwater Discharges

Mohave County has determined that the non-stormwater discharges listed below are not significant contributors of pollutants to the MS4 and are considered to be allowable non-stormwater discharges.

- a. Water line flushing
- b. Landscape irrigation
- c. Diverted stream flows
- d. Rising ground waters
- e. Uncontaminated groundwater infiltration
- f. Uncontaminated pumped groundwater
- g. Discharges from Potable water sources
- h. Foundation drains
- i. Air conditioning condensate
- j. Irrigation water
- k. Springs
- l. Water from crawl spaces
- m. Footing drains
- n. Lawn watering
- o. Individual residential car washing
- p. Discharges from riparian habitat and wetlands
- q. Dechlorinated swimming pool discharges
- r. Street wash water
- s. Discharges of flows from firefighting activities, excluding those from firefighting training exercises.

In addition to the above list, discharges that are authorized under a separate NPDES permit will be permissible, if the separate NPDES permit is being actively implemented.

## Reporting Year

Per AZG2016-002, the report year extends from July 1 of the previous calendar year to June 30.

## Wet Season

The wet seasons are defined as follows:

Summer Wet Season: June 1 – October 31

Winter Wet Season: November 1 – May 31



## Enforcement Authority

The IDDE Program will be enforced in accordance with Mohave County Stormwater Management Ordinance (SMO). Per Section 10, Article 1 of the ordinance;

*It is unlawful for any person to violate any provision or fail to comply with any of the requirements of this ordinance. Any person who violates or continues to violate any provision or requirement of this ordinance, any order, approval or permit issued under this ordinance or A.R.S. § 49-255.01, -263 or 263.01 is subject to the enforcement actions provided herein.*

## Program Responsibilities

The responsibilities associated with the IDDE Program extend to several departments within Mohave County, including, but not limited to, the Mohave County Flood Control District, Mohave County Public Works, Mohave County Development Services, and Mohave County Board of Supervisors. The responsibilities assigned to these departments are itemized as follows.

### **Mohave County Flood Control District:**

- 1) Serve as the primary contact for the IDDE Program.
- 2) Receive, log and route illicit discharge complaints to the appropriate departments for inspection.
- 3) Schedule visual dry weather and storm water monitoring.
- 4) Inspect illicit discharge complaints or perform stormwater discharge monitoring in the event that Public Works Inspectors are not available.
- 5) Collect, compile, and review initial inspection reports, plans of actions, notices of violation follow-up inspections and visual monitoring reports.
- 6) Prepare the discharge monitoring reports for submittal to ADEQ.
- 7) Train staff on various ordinances, programs and inspection procedures.
- 8) Compile, review and update the GIS database to actively identify industrial facilities and construction activities that discharge to the MS4.
- 9) Notify industrial and construction facility operators of the need to obtain permit coverage.
- 10) Compile and store the IDDE Program documentation that will be included in the Annual Report.



**Mohave County Public Works:**

- 1) Provide inspections for illicit discharge complaints, and visual monitoring of outfalls.
- 2) Identify sources of illicit discharges.
- 3) Provide spill response and cleanup for non-hazardous materials.
- 4) Provide maintenance for cleaning up illicit discharges within the public facilities.
- 5) Issue Notice of Violations and Cease Orders.
- 6) Assist in the education of the public regarding the IDDE Program and the Stormwater Management Ordinance.

**Mohave County Development Services:**

- 1) Supervise work performed by the Mohave County Flood Control District.
- 2) Answer questions from the public, educating residents, and business owners in the MS4 area.
- 3) Assist in the enforcement of the IDDE Program.
- 4) Provide emergency inspections.

**Mohave County Board of Supervisors:**

- 1) Serve as the authoritative arm, seeking Civil Penalties or Criminal Proceedings or listening to appeals associated with illicit discharge violations.
- 2) Adopt all procedures and policies necessary for the implementation, enforcement and funding of the IDDE Program.



## Illicit Discharge Complaint Procedures

The public will have the opportunity to report suspected Illicit Discharge Violations using four different mediums.

- 1) Electronically:  
On-line Form: [stormwater.mohavecounty.us](http://stormwater.mohavecounty.us)  
Email: [stormwater@mohavecounty.us](mailto:stormwater@mohavecounty.us)
- 2) Phone:  
Illicit Discharge Complaints: (928) 757-0925
- 3) Direct Mail:  
Mohave County Flood Control District  
Attention: Stormwater Manager  
P.O. Box 7000  
Kingman, AZ 86402
- 4) In Person  
Mohave County Development Services  
3250 East Kino Avenue  
Kingman, AZ 86409

Once received, the process for responding to the complaint is represented by the flow chart in Figure 3: IDDE Complaint Procedure.

Inspection forms to document the investigation are provided in Attachment 1.

If the discharge report appears to be an emergency, Risk Management and the Fire Department will be notified immediately.

## Dry Weather Outfall Monitoring

Ten (10) outfalls were identified during the mapping of the Mohave County MS4. These outfalls will be monitored/inspected on annual basis. The dry weather inspections occur in either the fall or spring ahead of the seasonal rainy periods. The inspections for the following year will be scheduled after submittal of the current year Discharge Monitoring Report (September 30).

The process for Dry Weather Outfall Monitoring is represented in the flow chart on Figure 4: Dry Weather Monitoring Procedure. An Inspection Form, which can be used to document the investigation, is provided at the end of this document in Attachment 1.

Additional dry weather inspections will be scheduled after maintenance efforts, repairs or installation of BMP's or if illicit discharges are suspected.



Figure 3: IDDE Complaint Procedure

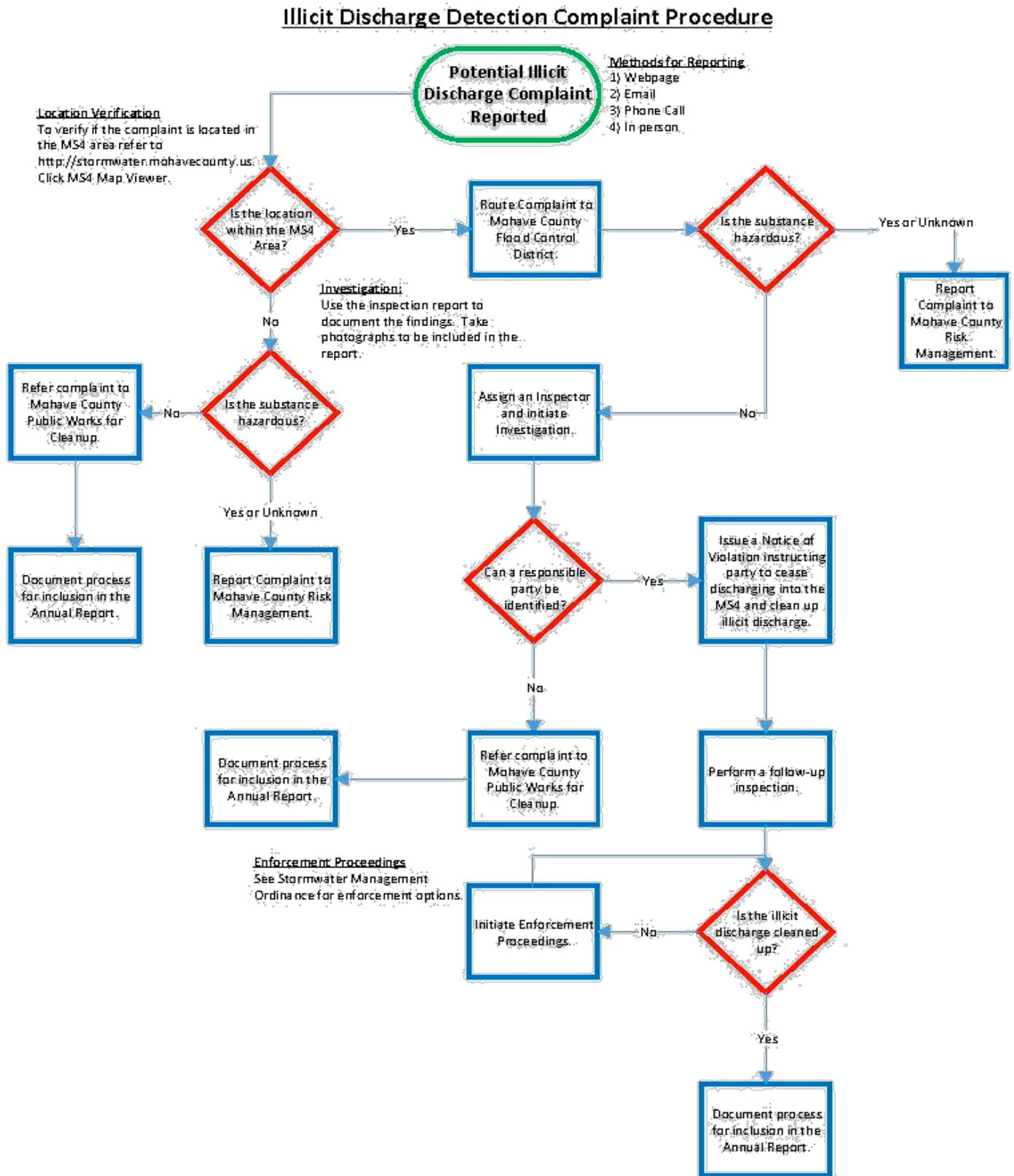
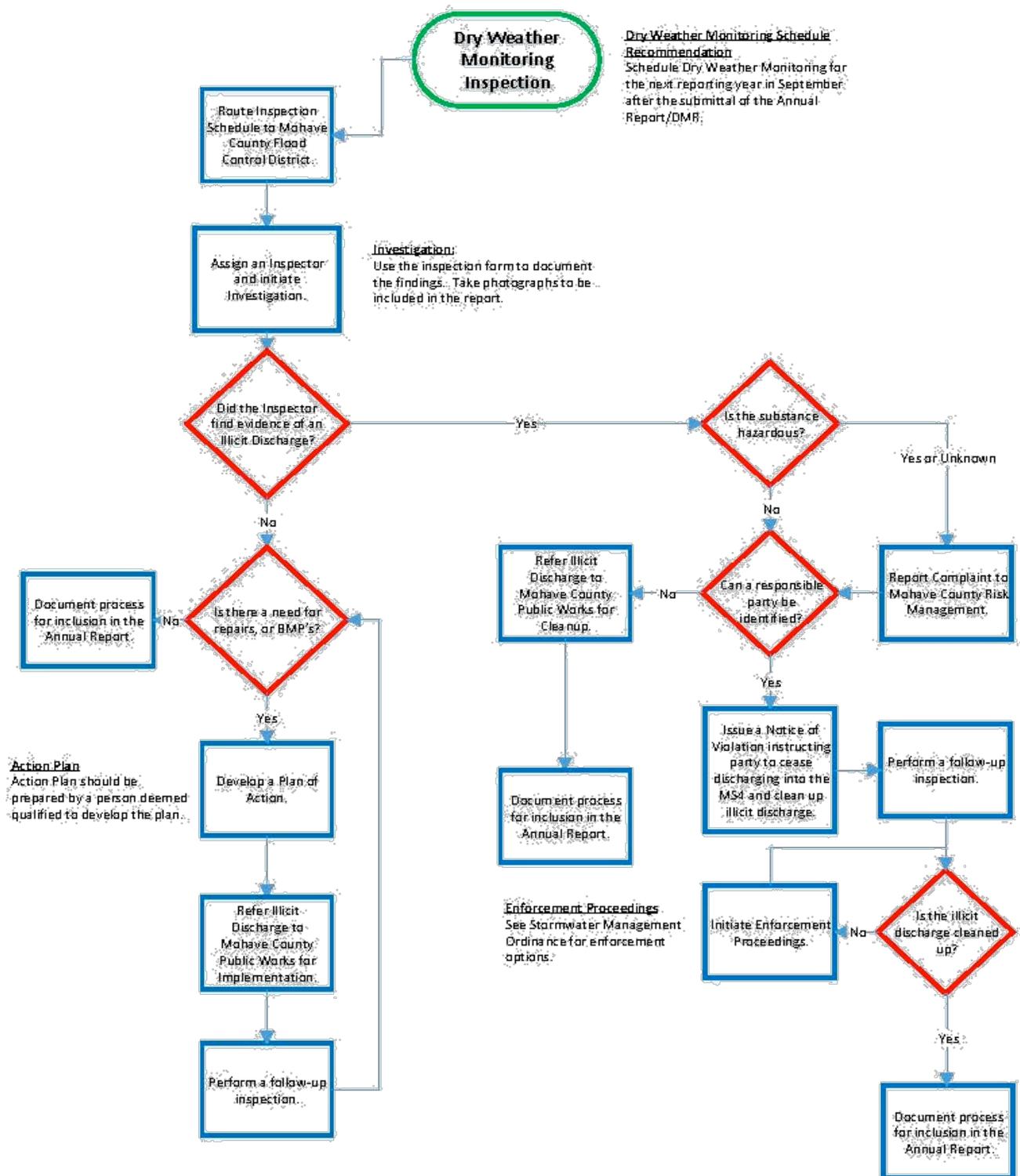


Figure 4: Dry Weather Monitoring Procedure

**Illicit Discharge Detection and Elimination  
Dry Weather Monitoring Procedure**



## Visual Stormwater Discharge Monitoring

Visual Stormwater Discharge Monitoring of five (5) representative MS4 outfalls will occur on an annual basis. The purpose of the monitoring is to provide an assessment of the stormwater quality. The monitoring events will be conducted a minimum of two times per wet season, for a total of four (4) monitoring events per outfall per year.

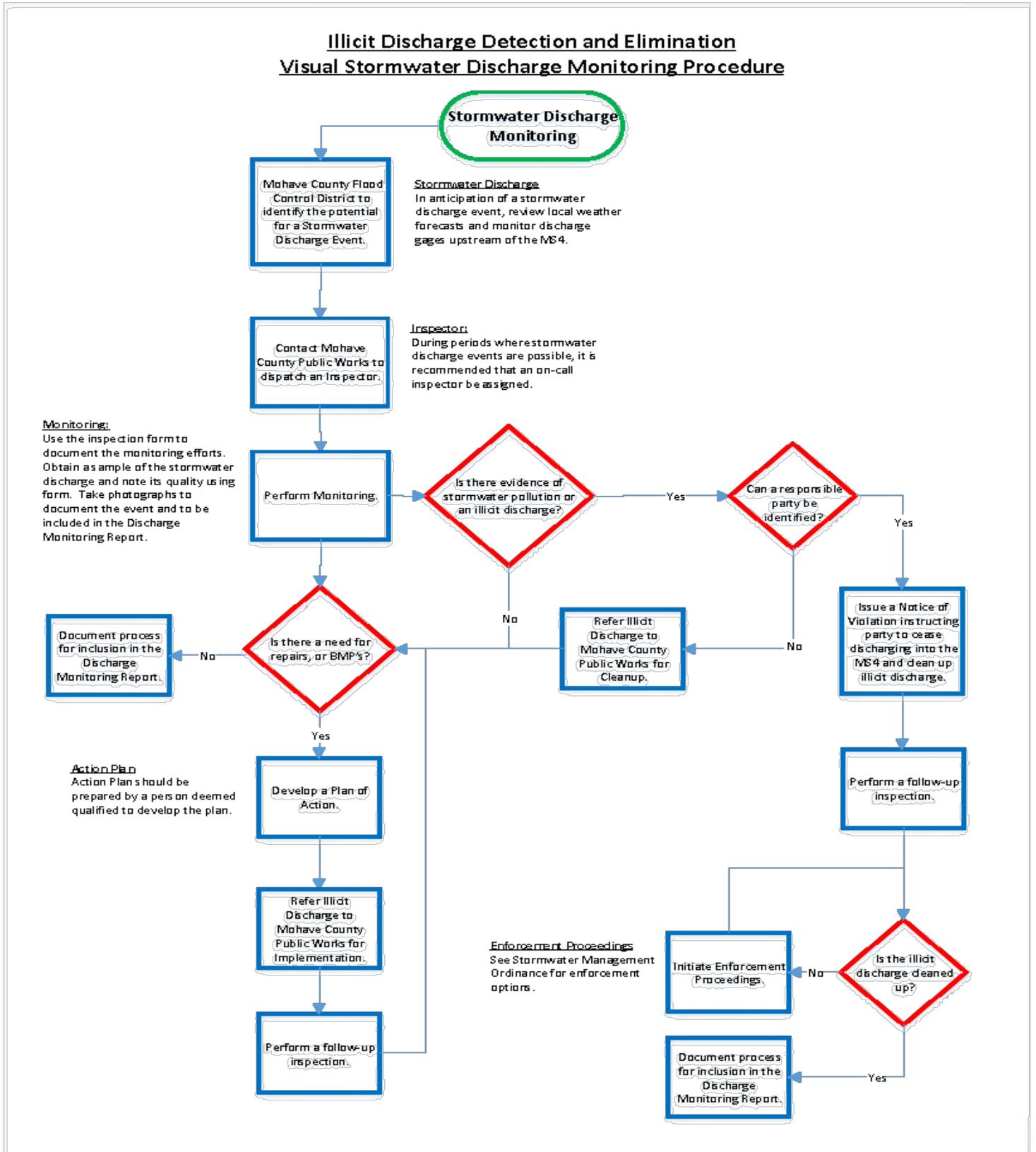
In the interest of the inspector's safety, if an inspector encounters an unsafe condition during a wet weather discharge, then the inspector will conduct the wet weather screening as soon as conditions warrant. It is anticipated that all monitoring will occur during normal business hours.

In the event that a Visual Stormwater Discharge Monitoring inspection could not be conducted at a given outfall during a given wet season, the reason will be documented in the Annual Report.

The process for Wet Weather Outfall Monitoring is represented in the flow chart on Figure 5: Visual Stormwater Monitoring Procedure. An Inspection Form, which will be used to document the investigation, is provided in Attachment 1.



Figure 5: Visual Stormwater Monitoring Procedure



## Unpermitted Discharges

Both EPA and ADEQ permit industrial facilities based on the activities that are performed at the facility. This permit also applies to public works facilities as well as privately owned and operated sites. There are twenty-six (26) activities in the non-mining sector of the permit that are regulated.

- **Sector A** – Timber Products
- **Sector B** – Paper and Allied Products
- **Sector C** – Chemical and Allied Products Manufacturing
- **Sector D** – Asphalt Paving and Roofing Materials Manufactures and Lubricant Manufacturers
- **Sector E** – Glass, Clay, Cement, Concrete, and Gypsum
- **Sector F** – Primary Metals
- **Sector K** – Hazardous Waste Treatment Storage or Disposal
- **Sector L** – Landfills and Land Application Sites
- **Sector M** – Automobile Salvage Yards
- **Sector N** – Scrap Recycling Facilities
- **Sector O** – Steam Electric Generating Facilities
- **Sector P** – Land Transportation
- **Sector Q** – Water Transportation
- **Sector R** – Ship and Boat Building or Repairing Yards
- **Sector S** – Air Transportation Facilities
- **Sector T** – Treatment Works
- **Sector U** – Food and Kindred Products
- **Sector V** – Textile Mills, Apparel, and other Fabric
- **Sector W** – Furniture and Fixtures
- **Sector X** – Printing and Publishing
- **Sector Y** – Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries
- **Sector Z** – Leather Tanning and Finishing
- **Sector AA** – Fabricated Metal Products
- **Sector AB** – Transportation Equipment, Industrial or Commercial Machinery
- **Sector AC** – Electronic, Electrical, Photographic and Optical Goods
- **Sector AD** – Reserved for Facilities Not Covered Under Other Sectors and Designated

As part of the IDDE program, the following steps will need to be taken to determine that the facilities in the MS4 are authorized to discharge by ADEQ.

- 1) Identify the commercial/industrial facilities located in the MS4. The facilities will be mapped in MS4 database to allow for active tracking and periodic updates.
- 2) Send a brochure describing the MSGP along with a letter requesting confirmation that the facility is either not performing activities regulated under the MSGP or has obtained coverage from ADEQ. The letter will request both their standard industrial code and if applicable the MSGP Number.
- 3) Report number of facilities contacted each year in the Annual Report.

Note: Construction activities in the MS4 will be tracked as part of the Construction Activity Stormwater Runoff Control Program MCM 4.



## Discharge Monitoring Report

During each reporting year, the Visual Stormwater Monitoring Efforts will be compiled as part of the Discharge Monitoring Report (DMR).

The DMR shall be submitted to ADEQ no later than September 30.

**Arizona Department of Environmental Quality**

1110 West Washington Street, Mail Code 5451A-1

Phoenix, AZ 85007

Should electronic reporting become available, the DMR will be submitted using the online system.

## Staff Training

Staff training on the IDDE will be conducted on a routine basis for existing employees and within the probationary period for new hires. The training efforts will be included in the Annual Report. The items to include are as follows;

- Topic of Training
- Summary of Training Presentation
- Date and Time that the Training was performed
- List of attendees

## Record Retention

Mohave County will retain the documents associated with the IDDE Program for a period of no less than three (3) years following the expiration date of the five -year permit. The records to be retained include:

- Illicit Discharge Complaints (Email, On-line Form, Phone Call Notes)
- Illicit Discharge Investigations
- Dry Weather Monitoring Inspection Reposts
- Stormwater Monitoring Inspection Reports
- Action Plan Reports
- Follow-up Inspection Reports
- Notices of Violation
- Records associated with Civil or Criminal Legal Action Proceedings
- Submitted Discharge Monitoring Reports

The records may be stored in either hardcopy or electronic copy formats, and will be located at:

**Mohave County Development Services**

3250 E. Kino Avenue

Kingman, AZ 86409

The ADEQ Director or an authorized representative may request access to the records during normal business hours.



# Attachment 1 – Inspection Forms

