



**ENGINEERING DIVISION STANDARD OPERATING  
PROCEDURE**

**Illicit Discharge Detection and Elimination – Tracing Illicit  
Discharge Source**

**SOP Identification No: SOP-IDDE 3.4**

**BMP No: 3.4**

**PURPOSE:**

To provide a uniform procedure for the investigation of confirmed illicit discharges into the stormwater sewer system and the tracking of the sources located within the MS4 Service Area.

**CONTACT:**

Stormwater Manager	Telephone No. (816)-582-5326
Sewer Maintenance Dispatch	Telephone No. (816)-331-2377
Engineering Department	Telephone No. (816)-331-1852
Codes Enforcement	Telephone No. (816)-331-1803

**IF SAFE AND PRACTICABLE, IMMEDIATELY HALT THE DISCHARGE OF ILLICIT  
MATERIALS AND UTILIZE THE APPROPRIATE MATERIAL FROM YOUR VEHICLE'S  
SPILL KIT TO LIMIT MATERIAL ENTERING OUTFALL/DRAIN !**

**PROCEDURE:**

Investigating, searching for, and locating the source of an illicit discharge may require separate responses by Public Works Operations Division and/or the Stormwater Manager.

**a.** If, during the inspection of the suspect illicit discharge, the Inspector is able to readily locate and observe the exact source of the discharge, the Inspector shall perform the following:

- i. Record on the Illicit Discharge Report Form the address or nearest intersection of the source and all details that they are able to observe.
- ii. Take photographs of the source location and any supporting observations.
- iii. Contact Public Works Operations Dispatch concerning the source and request the Dispatcher to notify the Stormwater Manager to assist in further investigation and to take the appropriate enforcement actions as outlined in **SOP IDEE 3.5**. Engineering Department: notify the Stormwater Manager directly.
- iv. Sewer Maintenance Dispatch will generate a work order for dry weather sampling as outlined in **SOP IDDE- Dry Weather Sampling**.
- v. Upon returning to the Sewer Maintenance offices, submit the completed form to the Public Works Dispatch.
- vi. Public Works Dispatch enter the data into the Request Tracker.

b. If the Inspector cannot immediately or readily identify the source of the illicit discharge, dry weather sampling of the discharge is conducted in accordance with **SOP IDDE- Dry Weather Sampling.**

i. An Investigation Work Order is initiated by the Sewer Maintenance Division if the sampling results received from the Environmental Laboratory confirm an illicit discharge. A Sewer Maintenance Crew is assigned to investigate the discharge source.

ii. Starting at the discharge or outfall point, a Sewer Maintenance Crew will trace the illicit discharge to its source by visual observing the active discharge running in drainage facilities or by opening manholes along the storm sewer and looking for visual evidence of the contaminant. The flow is to be traced or isolated until the improper connection or discharge source is found. Chemical sampling and field testing may be necessary to assist in tracing the discharge to the source.

iii. Sewer Maintenance Crew will record all observations and data collected during the sewer system investigation efforts on the Investigation Work Order Form, and provide the completed paperwork, including photographs, to the Sewer Maintenance Dispatch for entry into the UG's tracking system.

2. The Stormwater Engineer and/or the Sewer Maintenance Inspector will take further investigative steps to gather information on the source, such as property ownership records and supporting documentation on the illicit discharge detection and sampling results. Any enforcement action will be undertaken as outlined in **SOP IDDE 3.5-Illicit Discharge Elimination and Enforcement.**

3. If the City of Raymore is unable to determine or locate the source of the illicit discharge, after a reasonable and good faith effort of two additional investigations, then the Sewer Maintenance Dispatch will record the source as either "Indeterminate" or "Intermittent" in the City's tracking system.

#### **DOCUMENTATION:**

File and save all completed forms

Document any further action to be taken on the Request Tracker

If no further action is needed, document action taken on the Request Tracker and closeout the Request Tracker report.

Review procedures on an annual basis to look for to evaluate the tracing process.

#### **APPLICABLE REFERENCE INFORMATION:**

1. SOP IDDE- Dry Weather Sampling
2. SOP IDDE 3.5-Illicit Discharge Elimination and Enforcement.
- 3.
- 4.

#### **APPLICABLE FORMS:**

1. Illicit Discharge Report Form
2. Investigation Work Order Form.