

## **Appendix C**

### **Illicit Discharge Detection and Elimination Program**

*Memorandum of Understanding (MOU) with Salt Lake County Health Department*

*IDDE Standard Operating Procedures*



# Salt Lake County

IDDE STANDARD OPERATING PROCEDURES

REVISED 6/2025

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## **IDDE Reporting and Response**

### **Purpose:**

To outline the procedure for collecting information when a phone call or online report is received regarding suspected illicit discharges and initiating an investigation.

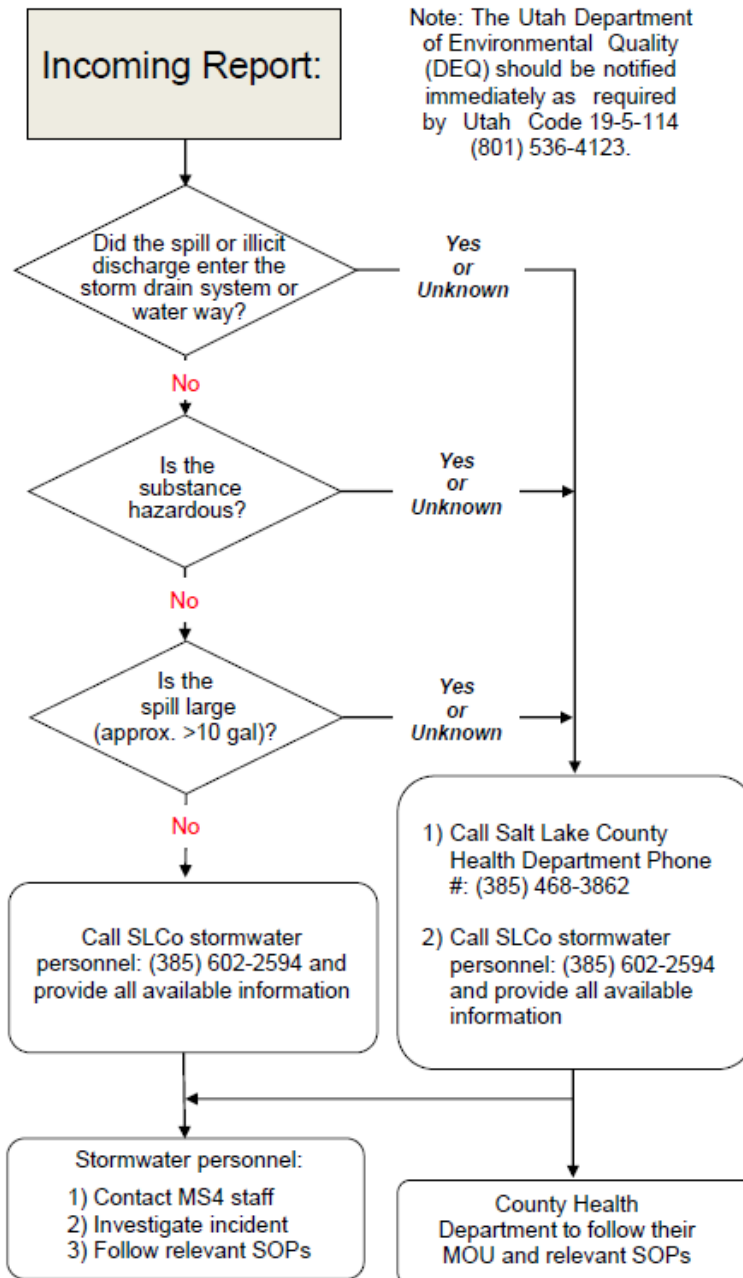
### **Information Gathering and Notification Procedure:**

1. Collect the information from the caller. Online reports are received by email.
2. Information to collect from phone calls for the Incident Tracking Form:
  - a. Date and location of the spill
  - b. Description of spill
  - c. Estimated quantity of spill
  - d. If the spill is contaminating a nearby waterway or storm drain
  - e. Contact information
  - f. Have caller submit photos (if available)
3. If the spill poses a threat to human health or the environment, have the caller call 911.
4. Notify stormwater personnel of the incident and forward all available information.
5. Stormwater personnel will notify appropriate agencies based on the IDDE Incident Response Flow Chart.
6. Stormwater personnel will investigate based on the location of the spill or assist the local MS4s, SLCo Health Department, and DEQ with the investigation, as needed.

### **Response Procedure:**

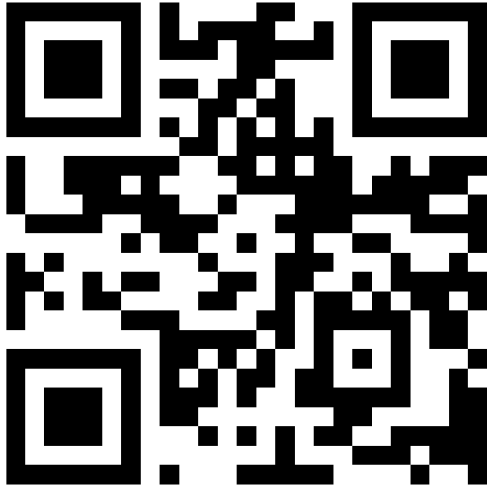
1. When the reported spill contaminates a nearby waterway or storm drain within a Salt Lake County owned facility, a member of the stormwater team will assist the SLCo Health Department with the investigation of the reported incident.
2. Document the spill and take photos.
3. Inspection information to collect:
  - a. Date of the spill and date notified
  - b. Date of investigation
  - c. Location of the spill/ facility of the spill
  - d. Description of spill and photos
  - e. Record physical indicators: odor, color, floatables
  - f. Record field parameters when there are no physical indicators present
  - g. Date of removal, repair, or enforcement action taken
4. If an illicit discharge is confirmed and the source is unknown, follow the procedure for **IDDE Tracing Illicit Discharge**.
5. If an illicit discharge is confirmed and the source is known, follow the procedure in **IDDE Removing Small Non-Hazardous Illicit Discharges** or **IDDE Large, Hazardous, or Storm Drain/Water Impacting Illicit Discharges**.
6. Upload photos and enter the incident into the IDDE GIS database. Follow up with the responsible party or the SLCo Health Department to confirm the completion of clean-up and incident closeout. Record the date and method of removal.

**REPORTING AND RESPONSE FLOW CHART**  
**Salt Lake County**



**SLCo IDDE Response Form (FOR COUNTY STORMWATER SUPERVISOR ONLY)**

<https://arcg.is/1efmn51>



## **IDDE Tracing Illicit Discharge**

### **Purpose:**

To outline the procedure for tracing a confirmed illicit discharge from an unknown source.

### **Notifications:**

Confirm that the appropriate MS4, the Salt Lake County Health Department (801-580-6681), and the Utah Department of Environmental Quality (801-536-4123) have been notified as required of the spill (see **IDDE Reporting and Response**).

### **Containment:**

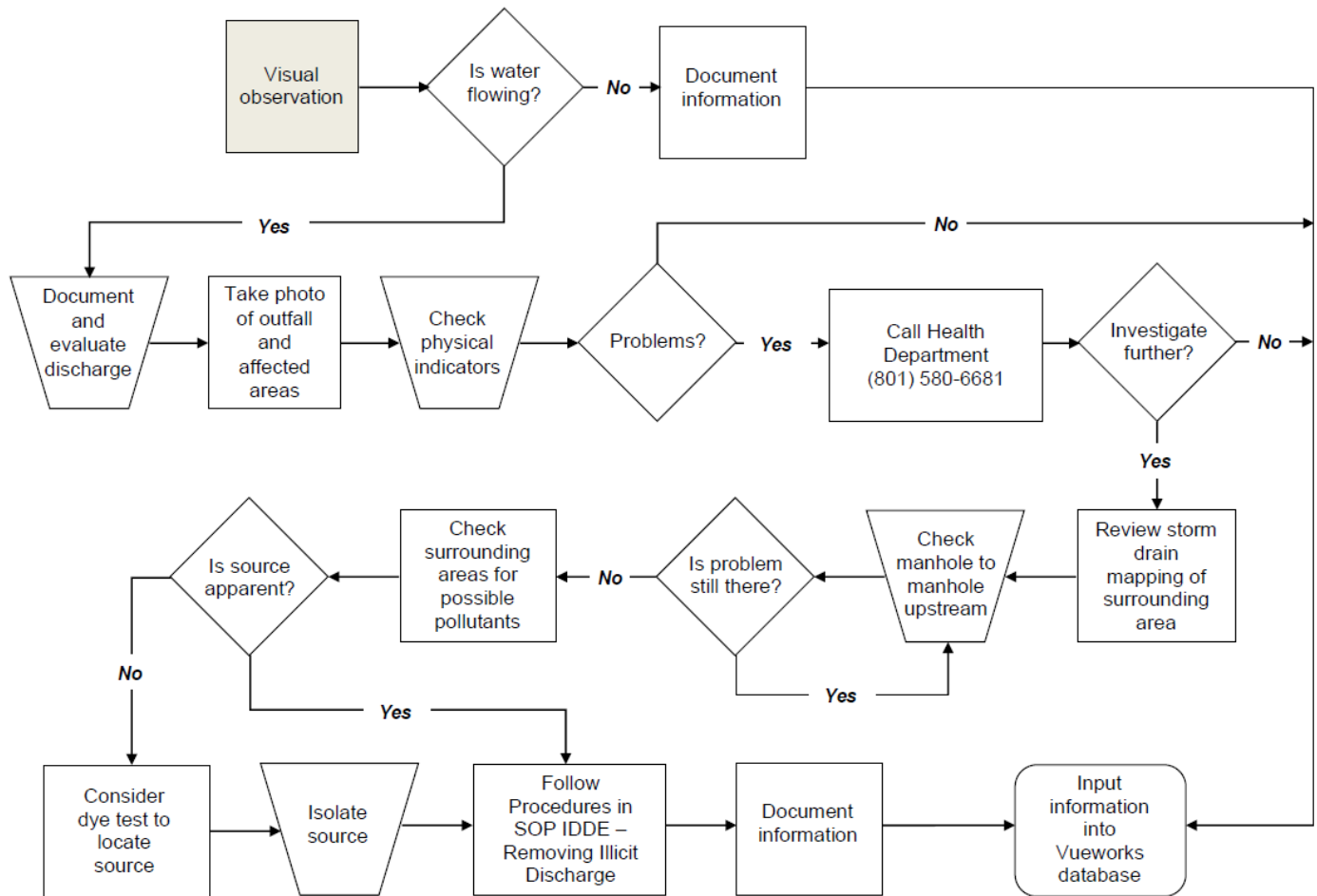
Immediately make efforts to stop or contain the discharge if possible.

1. Use appropriate personal protection equipment.
2. The general spill containment procedure is the following (when safe to do so):
  - a. Stop the source of the spill.
  - b. Cover storm drain inlets, manholes, and outfalls as needed.
  - c. Contain any spilled material using spill kits or other available materials.
  - d. Surround the perimeter of the spill with absorbent pads/rolls, berms, etc.
  - e. Take any further action directed by the SLCo Health Department or DEQ.

### **Tracing Unknown Source:**

1. Visually inspect inlets, pipes, and outfalls upstream of the discharge area for possible pollutants.
2. Use GIS software to trace the path of manholes back to the potential source.
  - a. Open the manhole and visually check for physical parameters:
    - i. flow
    - ii. colors
    - iii. odors
    - iv. floatable materials
    - v. deposits or stains
  - b. Investigate manholes closest to the outfall first and move up the sewer network until the source is identified or isolated between two manholes.
3. If the source is apparent, assist the SLCo Health Department in collecting water samples (when appropriate), enforcement actions, and cleanup procedures.
4. For small non-hazardous spills that do **not** affect nearby waterways or storm drains, follow the procedure in **IDDE Removing Small Non-hazardous Illicit Discharges**.
5. If the source is not apparent, collect field parameters as an indicator of the discharge source. Refer to the parameter table to check potential sources based on concentrations.
6. If the above efforts fail to identify the source, revisit the site the next business day to determine whether repeat visits are required or if the discharge was a one-time event.

## ILLICIT DISCHARGE SCREENING FLOW CHART





**Field Parameter Table**

Indicator Parameter	Benchmark Concentration	Notes
Ammonia (as Nitrogen)	≥1 ppm	<ul style="list-style-type: none"> <li>• pH and temperature dependent</li> <li>• Check for algal growth</li> <li>• Sample for fecal coliform and detergents</li> </ul>
Dissolved Oxygen	≤5.5 mg/L	<ul style="list-style-type: none"> <li>• Not enough oxygen to sustain aquatic life</li> <li>• Look for signs of algal growth</li> <li>• Test for phosphorus or nitrogen</li> </ul>
Turbidity	Background + 10%	<ul style="list-style-type: none"> <li>• Dependent on waterbody</li> <li>• Check for sediment sources</li> <li>• Test for phosphorus or nitrogen</li> </ul>
Conductivity	<300 ( <i>μmhos/cm</i> )	<ul style="list-style-type: none"> <li>• Measured in field w/ probe</li> <li>• If above benchmark sample for fecal coliform</li> </ul>
pH	≤5.5 or ≥ 9	<ul style="list-style-type: none"> <li>• Not useful for determining sanitary wastewater</li> <li>• High pH values may indicate an industrial discharge or residential wash waters</li> </ul>
Temperature	>55°F or 12.8°C	<ul style="list-style-type: none"> <li>• Indicator of a broad range of industrial discharges</li> <li>• Temperature should be near or below ambient conditions for groundwater or stormwater runoff</li> </ul>
Chlorine (Free)	≥ 0.5 ppm	<ul style="list-style-type: none"> <li>• Supplemental parameter that identifies a few specific industrial discharges</li> <li>• Corrosive to MS4 system at 2 ppm and toxic to wildlife after 0.5 ppm</li> <li>• Check for road salt applications</li> </ul>

*Adapted From Source: Center for Watershed Protection, 2004*

## **IDDE Removing Small Non-Hazardous Illicit Discharges**

### **Purpose:**

To outline the procedure for containing and cleaning up small non-hazardous spills that do not affect storm drains or waterways and the proper disposal of the waste.

### **Notifications:**

1. Confirm that the appropriate MS4, the Salt Lake County Health Department (385) 468-3862 the property owner, and the Utah Department of Environmental Quality (801-536-4123) have been notified as required (see the flowchart in **IDDE Reporting and Response**).
2. Notify the property owner and inform them of their responsibility to clean up the spill and offer technical assistance.
3. When there is no property owner or responsible party available, stormwater personnel will clean up small non-hazardous spills and return within 48 hours to reinspect the site and notify/educate the property owner.

### **General Containment:**

Immediately make efforts to stop or contain the discharge if possible. Never wash spills into the storm drain inlet.

1. Use appropriate personal protective equipment.
2. The general spill containment procedure is the following:
  - a. When possible, stop the source of the spill.
  - b. Cover storm drainpipes, manholes, and inlets as needed.
  - c. Use dry clean-up methods such as sorbent materials, broom and shovel, and vacuum.
  - d. Place a barrier around the spill. Contain any spilled material and surround the perimeter of the spill with absorbent pads/rolls, berms, etc.
  - e. Cover the spill completely with appropriate material.
3. Clean up and dispose of waste:
  - a. After the spill is absorbed, dry sweep or vacuum the material into waste bags.
  - b. Depending on the contents of the spill, dispose of waste bags according to local regulations.
  - c. If the spill soaks into the soil, dig up the affected area and dispose of it according to state and federal regulations.

### **Disposal:**

Dispose of material in compliance with local, state, and federal regulations. For questions regarding disposal methods or procedures for clean-up or spill materials, contact the Salt Lake County Health Department (385) 468-4380.

### **Documentation:**

Document notifications, containment, clean-up, and disposal in GIS.

## **IDDE Large, Hazardous, or Storm Drain/Water Impacting Illicit Discharges**

### **Purpose:**

To outline the procedure for containing and cleaning up spills that require notification of the Salt Lake County Health Department and the Utah Department of Environmental Quality based on the size, location, and contents.

### **Notifications:**

Confirm that the appropriate MS4, the Salt Lake County Health Department (385) 468-3862, the property owner, and the Utah Department of Environmental Quality (801-536-4123) have been notified as required of the spill (see Reporting and Response Flow Chart).

### **Assist DWQ and Salt Lake County Health Department Emergency Response Personnel with:**

1. Determining the property owner or the financially responsible party.
2. Contacting the owner regarding laws, ordinances, codes, and any other concerns.
3. Suspending access to storm drain when possible.
4. Directing responsible party to initiate repairs/corrections/clean-up.
5. Coordinating with enforcement officials for escalating penalties.
6. Follow-up inspections and confirmation of clean-up.

### **Documentation:**

Notifications, containment, and clean-up information are documented in GIS Stormwater Database.



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*Mayor*

March 25, 2025

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**Re: MEMORANDUM OF UNDERSTANDING**

**Cooperation and Enforcement of Salt Lake County's UPDES Stormwater  
discharge permit**

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Mayor

**Catherine Kanter**  
Deputy Mayor of Regional  
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**Lisa Hartman**  
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This Memorandum of Understanding (MOU) is entered into by and between the Salt Lake County Health Department (Health Department) and Salt Lake County Flood Control Engineering Division and together are sometimes referred to as the "PARTIES," in the enforcement of the Salt Lake County Municipal Separate Storm Sewer System (MS4) UPDES Permit No. UTS000001.

Whereas, The Salt lake County Health Department is organized as a County health department and exists pursuant to the Utah Code Ann. 26A-1-103 and chapter 9.04 of the Salt Lake County Code of Ordinances; and

Whereas, the Health Department is responsible for enforcing state laws, administrative rules, local ordinances, standards and regulations relating to public health, sanitation, safety and environmental quality as provided for in the Utah Local Health Department Act, Utah Code Ann. 26A-1-114; and

Whereas, pursuant to 26A-1-114(1), the Health Department may enforce state laws, local ordinances, department rules and local health department standards and regulations in all incorporated and unincorporated areas of Salt Lake County; and

Whereas, the Health Department has adopted health regulations including Regulation # 13 prohibiting the discharge or release of pollutants or contaminants into storm sewers, drains, gutters or waters of the State; and

Whereas, Health Regulation # 13 is also incorporated in Section 9.32.010 of the Salt Lake County Code of Ordinances; and

Whereas, Utah Code Ann, 17-8-5 provides the county legislative body may promulgate regulations to protect channels, storm sewers, and drains and may provide for the enforcement of those regulations; and

Whereas, Salt Lake County has enacted section 17.08.020 of the Salt Lake County Code of Ordinances, which provides for the safe disposal of natural storm waters and flood waters and which prohibits the interference, damage or use of any flood control, storm drainage or water quality facility without having first received written permission from the division; and

Whereas, Salt lake County has adopted 17.08.100 of the Salt Lake County Code of Ordinances which makes it unlawful for any person to place or cause to be placed in a drain, channel, reservoir, detention basin or any other flood control facility any

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matter of any kind that may degrade the quality of the water without having first receiving written permission from the Engineering or Townships Division: and

Whereas, Section 1.12.010 of the Salt Lake County Code of Ordinances provides that the violation of any provisions of an ordinance constitutes a class B Misdemeanor; and

Whereas, 26A-1-120(1) of the Utah Local Health Department Act provides that the County Attorney shall prosecute criminal violations of the Public Health Laws and Rules and 26A-1-123 Unlawful Acts-- Criminal and civil liability of the Departments of Health and Environmental Quality; and

Whereas, the Parties wish to enter into this MOU to formalize the procedure for the enforcement and inspections of applicable statutes, ordinances and health regulations to protect water quality.

Now, therefore, in consideration of the following mutual promises, terms and conditions, it is agreed by the parties as follows:

1. **Parties Responsibilities of the Health Department**

- 1.1 The Health Departments Environmental Health Division will assist Salt Lake County Flood Control Engineering in the investigation of incidents involving spills, releases or discharge of pollutants, contaminants, or waste into waterways and drainage systems. The Health Department will work with the responsible party and Flood Control Engineering to ensure the spill or discharge is remediated as required by rule or regulation;
- 1.2 The Health Department agrees to respond to any reports from Flood Control Engineering regarding spills, releases or the discharge of pollutants, contaminants or waste in gutters, storm drains and Countywide flood control facilities;
- 1.3 The Health Department will provide annual reports to Flood Control Engineering Division that includes the status of the complaints and actions taken in the response to complaints at County owned facilities, to resolve and finalize by documentation cases for the UPDES Permit annual report, and the Illegal and Illicit Discharge Elimination (IDDE) control measures requirements;
- 1.4 The Health Department agrees through its regulations adopted by the Salt Lake County Board of Health, pursuant to Section 9.04.060 of the County Code of Ordinances, which contains procedures for the enforcement of violations through civil, administrative or criminal proceedings pending the

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severity of the violation, to help determine the severity of the enforcement of a violation.

- 1.5 The Health Department will initiate and assist **Salt County** Flood Control Engineering in appropriate enforcement actions to compel compliance and pursue sanctions for violations that coincide with the County's UPDES Discharge Permit, UTS000001;
- 1.6 Warning letters and Notice of Violations letters issued for stormwater discharges in Salt Lake County owned or operated facilities will be provided a courtesy copy to the Watershed Section Manager in the Flood Control Engineering Office at 2001 S State Street #N3-120 Salt Lake City, Utah 84190;
- 1.7 The Health Department will participate in the County's Flood Control and Water Quality Management Planning Program designed to enhance and protect water quality by making an annual contribution of \$5,000.00 to the County Stormwater Coalition Education Campaigns;
- 1.8 The Health Department will provide household hazardous waste facilities to all citizens of incorporated cities and Unincorporated Salt Lake County. The household hazardous waste program allows for the public to dispose of leftover products that contain corrosive, toxic, ignitable, or reactive substances (such as paint, cleaners, oil and pesticides). This includes services such as mailers, ads, collection events and ABOP disposal locations for antifreeze, batteries, oils and paint. Generators of (CESQG) are not allowed to dispose of hazardous waste at these facilities and must dispose of them at an approved landfill;
- 1.9 The Health Department will help collaborate an Industrial Education Program in all cities and townships of Salt Lake County, with a Stormwater Pollution Prevention Campaign and will assist Flood Control Engineering with any enforcement related to violations associated to the UPDES Permit UTS000001;
- 1.10 The Health Department will notify Salt Lake County Flood Control Engineering of spills or responses in other cities that are adjacent to the boundary with County owned or operated facilities on an annual basis, with immediate threats reported as identified.

#### **2.0 Responsibility of Salt Lake County Flood Control Engineering Division**

- 2.1 County Flood Control Engineering will report to the Health Department any incidents involving spills, releases or the discharge of pollutants, contaminants or wastes into the gutters and stormdrains covered by the permit;

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- 2.2 Incidents at County owned or operated facilities will be reported immediately to the Health Department 24 Hour Hot line at (801) 580-6681 or to (385) 468 -3862 during regular business hours;
- 2.3 Flood Control Engineering office shall participate with the Health Department in investigating or the enforcement action at County owned or operated facilities initiated by the Health Department;
- 2.4 Participation shall include but not be limited to information regarding permits, stormwater systems and mapping, tracking spills or stormdrain systems, dye testing and recommendations for the extent of clean-up in the stormdrain systems County Facilities connect into;
- 2.5 Flood Control Engineering will handle the Stormwater Pollution Prevention Plan review, approvals and enforcement in accordance with the UPDES permit within the Salt Lake County owned or operated projects;
- 2.6 Flood Control Engineering shall manage the construction inspections related to stormwater and the UPDES Permit.

**3.0 Coordination & Training**

- 3.1 Representatives of the Parties will participate in the investigation and enforcement of the alleged violations of the Health Regulations and/or ordinances to protect storm sewers and drains as required by the UPDES Stormwater Discharge Permit. In addition, the parties shall confer to determine an appropriate legal remedy on a case-by-case basis, including administrative, civil and criminal actions;
- 3.2 The Parties agree to pursue training resources with the goal of improving water quality, environmental enforcement, public awareness and compliance.

**4.0 EFFECTIVE DATE**

- 4.1 This M.O.U shall continue in effect until terminated by either party giving six (6) months written notice in advance to the other party's designated representative.





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