

# VDOT Illicit Discharge Detection and Elimination (IDDE) Program Manual



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## ACRONYMS

AHQ	Area Headquarters
DEQ	Virginia Department of Environmental Quality
EPA	United States Environmental Protection Agency
GIS	Geographic Information System
HMMS	Highway Maintenance Management System
IDDE	Illicit Discharge Detection and Elimination
I&IM	Instructional & Informational Memorandum
LUP	Land Use Permit
MOM	Maintenance Operations Manager
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
RHMM	Regional Hazardous Materials Manager
TAMS	Turnkey Asset Management Services
TMDL	Total Maximum Daily Load
TOM	Transportation Operations Manager
VAC	Virginia Administrative Code
VDEM	Virginia Department of Emergency Management
VDOT	Virginia Department of Transportation
VPDES	Virginia Pollutant Discharge Elimination System
VSMP	Virginia Stormwater Management Program

# 1.0 INTRODUCTION AND PURPOSE

## 1.1 MS4 Permit Background

The Virginia Department of Transportation (VDOT) is committed to ensuring that stormwater runoff from its roadways and facilities complies with all federal and state environmental regulatory requirements.

VDOT’s Municipal Separate Storm Sewer System (MS4) Individual Permit (VA0092975), hereafter referred to as the MS4 Permit, is issued through the Virginia Pollution Discharge Elimination System (VPDES) program and Virginia’s Stormwater Management Program (VSMP) regulations, and is administered at the State-level by the Virginia Department of Environmental Quality (DEQ). The VPDES program is part of the Federal National Pollutant Discharge Elimination System (NPDES), authorized by the United States Environmental Protection Agency (EPA) through the Clean Water Act. This permit replaces and supersedes previous coverage under the MS4 General Permit.



**Figure 1.** Stormwater runoff into drop inlet.

VDOT’s MS4 Permit is applicable for five years and effective from July 1, 2017 to June 30, 2022. It authorizes stormwater discharges from VDOT’s MS4 service area to surface waters in the Commonwealth of Virginia.

The VDOT service area regulated by the MS4 Permit (referred to as VDOT’s MS4) covers any separate storm sewer system owned and/or operated by VDOT and located within census urbanized areas (CUAs) of Virginia identified in the 2010 Decennial Census by the U.S. Census Bureau (see Table 1 and Figure 1).

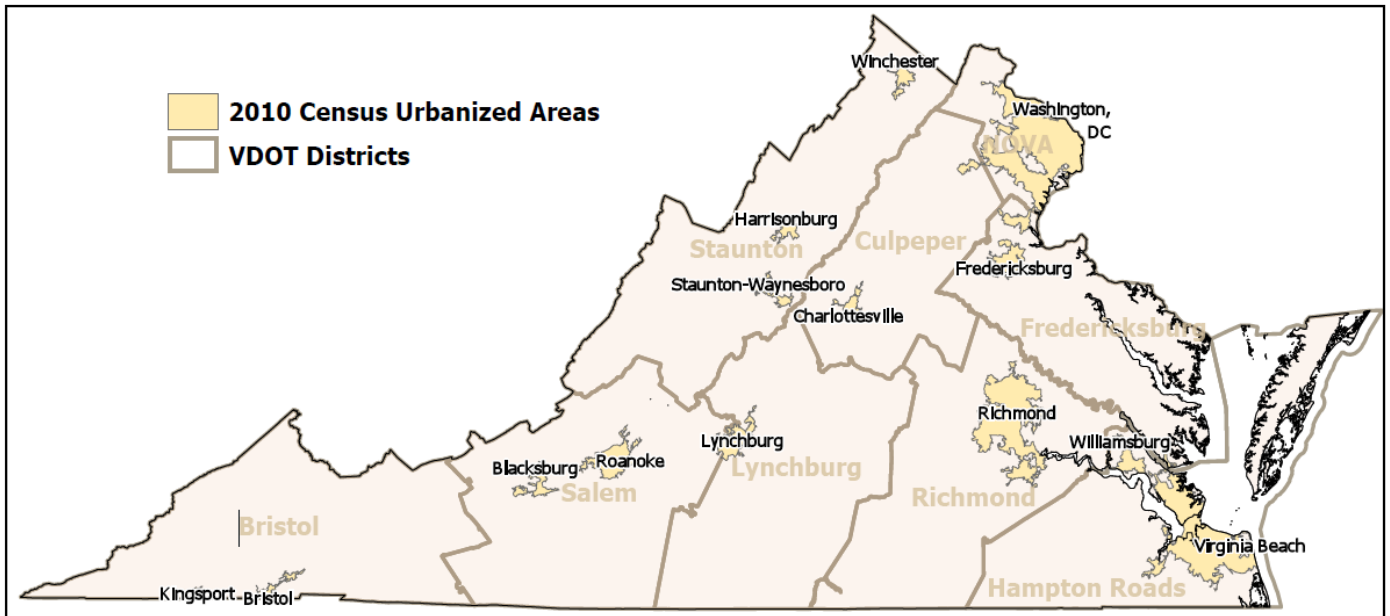
**Table 1.** Census Urbanized Areas (CUAs) in Virginia identified in the 2010 U.S. Census

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Blacksburg	Richmond
Bristol	Roanoke
Charlottesville	Virginia Beach
Fredericksburg	Washington, DC
Harrisonburg	Winchester
Kingsport	Staunton-Waynesboro
Lynchburg	Williamsburg

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VDOT’s MS4 includes VDOT-owned structures along interstates, primary roads and some secondary roads throughout the state. Secondary roads in cities and two counties (Arlington & Henrico) are maintained by the respective localities, and do not fall under VDOT’s jurisdiction.



## 1.2 MS4 Permit Requirements for Illicit Discharge

Part 1.C.3 of the MS4 Permit requires VDOT to develop an Illicit Discharge Detection and Elimination (IDDE) Program to detect and eliminate illicit discharges (as defined in 9 VAC 25-870-10) to its MS4 to the extent allowable under federal, state and local law and regulation.

VDOT is also required to maintain an IDDE Program Manual that includes procedures for identifying and eliminating any illicit discharges discovered to VDOT’s MS4, including:

- Identifying, locating and referring to local governments, state and/or federal agencies illicit discharges no later than 30 days, where elimination is beyond permittee’s options for legal authority
- Eliminating dry weather flows not authorized in Part 1.A.b of the MS4 Permit that were discovered by VDOT employees during maintenance of roadways or drainage systems within 30 days of discover where elimination is within the permittee’s control.
- Receiving and investigating reports of illicit discharges from the public within 5 days of receipt; and
- Reporting to DEQ within 24 hours of the discovery of any illicit discharge of sewage through illegal connection into the permittee’s MS4.

The June 2020 revision marks the first revision to the IDDE Program Manual since coverage began under VDOT’s MS4 Individual Permit and supersedes all previous versions. It presents those standard procedures VDOT will use to implement its IDDE Program in accordance with the MS4 Permit requirements above. It provides the agency framework to identify, report, investigate, minimize and eliminate illicit discharges to VDOT’s MS4.

This manual was developed in general accordance with the EPA’s, *"Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments"*.

Referenced throughout this manual, the IDDE Program relies on other supplemental materials to further assist with various elements of the Program, including *the Illicit Discharge Detection and Evaluation Field Guide* in **Appendix A**.

### 1.3 Background of Illicit Discharges

The Code of Virginia (9VAC25-870-10) defines an illicit discharge as “...any discharge to a MS4 that is not composed entirely of stormwater, except discharges pursuant to a separate VPDES or state permit (other than the state permit for discharges from the municipal separate storm sewer), discharges resulting from firefighting activities, and discharges identified by and in compliance with 9VAC25-870-400 D 2 c (3).” Table 2 shows some common examples of illicit discharges that may be found in VDOT’s MS4:

**Table 2. Common Examples of Illicit Discharges**

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• Automotive Fluids (Oil, Fuel, Antifreeze)*	• Landscape Waste (Grass Clippings and Leaves)
• Cooking Oil and Grease	• Improperly Managed Fertilizer
• Solvents	• Sediment
• Paint	• Gray Water
• Chemical Cleaners (Detergents, Soaps, etc.)	• Septic/Sewer Wastewater
• Pesticides and Herbicides	• Concrete Waste/Washout
• Improperly Managed Salt	• Unpermitted Cross-Connections

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\*VDOT’s MS4 permit specifies that discharges associated with vehicular accidents are not handled through the IDDE process. See Section 1.4 for more details.

Table 3 contains non-stormwater discharges **not** considered significant contributors of pollutants and authorized by the permit to discharge to surface waters (VA0092975 Part 1.A.1.b).

**Table 3. Categories of Allowable Non-Stormwater Discharges**

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• water line flushing	• water from crawl space pumps
• landscape irrigation	• footing drains
• diverted stream flows	• lawn watering
• rising groundwater	• individual residential car washing
• uncontaminated groundwater infiltration	• flows from riparian habitats and wetlands
• uncontaminated pumped ground water	• de-chlorinated swimming pool wastewater discharges
• discharges from potable water sources	• street wash water including bridge washing
• foundation drains	• discharges or flows from firefighting activities
• air conditioning condensation	• those discharge-generating activities identified by the DEQ as not requiring VPDES authorization
• irrigation water	• other VPDES-authorized discharges
• springs	

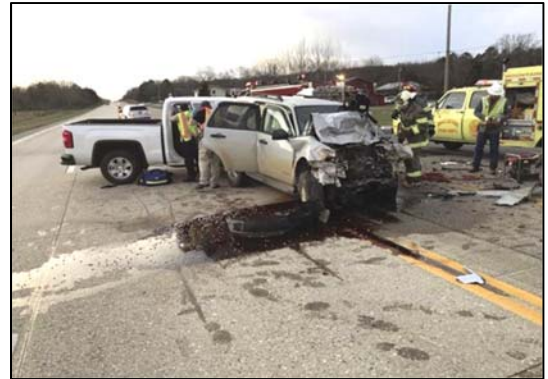
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## 1.4 VDOT's Illicit Discharge Exclusion for Vehicular Accidents

Part 1.C.3.d of VDOT's MS4 permit states, "For the purposes of this permit, fluids from vehicular accidents shall not be handled through the IDDE tracking and reporting required in Part I.C.3 [normal tracking and reporting requirements]."

Since these incidents typically occur under 'emergency response' situations, any material spilled or released to the environment as a result of a vehicular accident falls under a process involving the Virginia Department of Emergency Management (VDEM), local fire departments and local governments as specified in Part 1.C.3.d and through internal Traffic Incident Process Instructional and Informational Memoranda (I&IMs).



**Figure 3.** Typical oil/petroleum spill from a vehicular accident.

In some instances, notification and cleanup coordination with DEQ may be necessary. If spills from these incidents enter VDOT's MS4, VDOT's Traffic Incident Process aids in coordinating appropriate cleanup efforts, but does not report them as illicit discharges through the IDDE database or on the MS4 Annual Report.

## 1.5 Overview of VDOT's IDDE Program

While responsibility for the MS4 Permit and maintaining the overall MS4 Program lies with the Central Office Location & Design Division, other Divisions (e.g. Maintenance, Construction, etc.) maintain responsibility for individual programs. Due to expertise in handling various chemical hazards, the Central Office Environmental Division is the lead for the IDDE Program. Refer to VDOT's MS4 Program Plan BMP 3(c) for further details regarding distribution of responsibilities.

The following outlines general program elements:

- **Detection/Reporting:** Describes tools and methods used to detect potential illicit discharges to VDOT's MS4 and report them to the Central Office IDDE Team and other appropriate supervisory personnel. (Section 2.0)
- **Evaluation**
  - **Internal Review:** Central Office IDDE Team process to screen and identify suspected illicit discharges from the potential illicit discharge reports. (Section 3.1)
  - **Field Investigation:** Procedures to evaluate suspected illicit discharges identified during the Internal Review. (Section 3.2)
- **Elimination:** Processes to eliminate illicit discharges confirmed through evaluation efforts. (Section 4.0)
- **Tracking:** Procedures to track and document all efforts related to the IDDE process. (Section 5.0)
- **Training:** Procedures to train applicable field personnel related to the IDDE Program. (Section 6.0)



### 1.5.1 VDOT'S IDDE Team

Synopsis of key VDOT IDDE Team Member Roles:

- **Illicit Discharge Coordinator:** a member of the Environmental Compliance Group in the Central Office Environmental Division. Primary individual responsible for tracking and coordinating with necessary district staff and other localities/state agencies to resolve potential illicit discharge reports. Oversees the illicit discharge tracking and reporting geodatabase.
- **Environmental Compliance Group:** Group within the Central Office Environmental Division with various responsibilities to help support the overall MS4 Program Plan. Part of the IDDE Team that helps troubleshoot and coordinate on issues related to potential illicit discharge reports.
- **Location & Design MS4 Group:** Group within the Central Office Location & Design Division that has the responsibility for overseeing the entire MS4 Program. Part of the IDDE Team that helps troubleshoot and coordinate on issues related to potential illicit discharge reports.
- **District NPDES Coordinator:** VDOT staff member in each district who oversees administration of the National Pollution Discharge Elimination System (NPDES). Frequently involved in various levels of the IDDE process including, performing field investigations of illicit discharges, coordinating cleanups with district VDOT personnel, and following-up on discharge resolutions.
- **Regional Hazardous Materials Manager (RHMM):** VDOT staff members working regionally to handle issues related to hazardous materials management and are involved in various levels of the IDDE process including, performing field investigations of illicit discharges, coordinating cleanups with district VDOT personnel, and following-up on discharge resolutions. Depending on the suspected nature of an illicit discharge report, a RHMM may be asked to help investigate or coordinate cleanup efforts.



**Figure 4.** Illicit discharge of paint into a stream. It takes personnel from all levels of VDOT to accurately report and resolve illicit discharges.

Key points of contact involved in VDOT's IDDE Program as well as adjacent MS4 operators are provided in **Appendix B**. This list will be revised regularly. An updated list may be obtained by emailing [IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov).

## 2.0 DETECTION AND REPORTING OF SUSPECTED ILLICIT DISCHARGES

The IDDE program utilizes several reporting mechanisms, discussed in the following subsections. Additional information can be found in the *IDDE Field Guide* (**Appendix A**).

### 2.1 VDOT Identification during Normal Operations

It is the responsibility of every VDOT employee or contractor to be watchful and report any illegal or unsafe condition discovered during the course of normal business operations. VDOT field staff

are critical to the recognition and reporting of any illicit discharge to the VDOT MS4. Thus VDOT employees and contractors working within the regulated MS4 area are required to be trained in illicit discharge recognition and reporting once every five (5) years (Part 1.C.3.c and Part 1.C.6.h.i). See Section 6.0 for more detail regarding IDDE training.

Additionally, VDOT field personnel are issued copies of the *Illicit Discharge Detection and Evaluation Field Guide* (**Appendix A**) for easy reference in identifying and reporting illicit discharges. A copy of the Field Guide is also posted on the VDOT stormwater webpage at [www.virginiadot.org/stormwater](http://www.virginiadot.org/stormwater). The *IDDE Field Guide* outlines the discharge evaluation and reporting process for VDOT field and maintenance personnel. Detailed information gathered is relayed to a member of VDOT IDDE Team or a dedicated email inbox (see Section 2.4). See the IDDE Field Guide in **Appendix A** for further information regarding illicit discharge evaluation procedures for field personnel.

## 2.2 Online Application Reporting

Electronic reporting information for illicit discharges is available to the public via VDOT's main MS4/Stormwater webpage ([www.virginiadot.org/stormwater](http://www.virginiadot.org/stormwater)). Submitted information is forwarded to the IDDEReports email distribution list for follow up by the IDDE Team (see also Section 2.4).

## 2.3 VDOT Call Center/Customer Service Center



**Figure 5.** Operator at a regional VDOT Call Center.

VDOT maintains a hotline for the public to report issues they witness or experience along VDOT's right-of-way. The public can contact the VDOT Customer Care Center (or VDOT Call Center) at 1-800-FOR-ROAD (1-800-367-7623), or at [my.vdot.virginia.gov](http://my.vdot.virginia.gov). This includes reporting of potential illicit discharges.

When a call is received through the VDOT Call Center, Call Center staff use a prescribed checklist that determines how to classify the report. If Call Center staff believe the issue should be classified as a possible illicit discharge, a Highway Maintenance Management System (HMMS) Work Order is created with a problem type of "Polluted Stormwater (IDDE)." This alerts the Central Office IDDE Team and assigns the work order to the appropriate Residency. The Residency or Residency-assigned Area Headquarters (AHQ) staff then uses the procedures in Section 3.0 of this manual and the *IDDE Field Guide* to investigate.

## 2.4 IDDEReports Email

VDOT maintains an email inbox for reporting potential illicit discharges. The public, as well as localities, municipalities and regulatory agencies are encouraged to submit observations of potential illicit discharges to the IDDE Reports email at [IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov).

## 2.5 Reporting by Localities, Municipalities, Counties, State and Federal Agencies

Neighboring localities, municipalities and counties may observe a potential illicit discharge entering VDOT's MS4. Through annual coordination meetings with adjacent MS4s, members of the IDDE Team develop working relationships with other stormwater and illicit discharge personnel from localities and municipalities. All outside personnel are asked to send these observations to the IDDEReports email address for reporting and/or further coordination and through the Illicit Discharge Coordinator.

Occasionally, illicit discharge observations are sent from local government contacts directly to Central Office or District-level staff by phone call and/or email. In certain situations, this can expedite a response during a time-sensitive operation. VDOT personnel who directly receive a potential illicit discharge report forward the information to the IDDEReports email address as soon as they are able for appropriate tracking and reporting.

## 3.0 VERIFYING ILLICIT DISCHARGES

Verifying a discharge is illicit can be challenging. VDOT utilizes several methods for confirming if a reported discharge qualifies as an illicit discharge.

### 3.1 IDDE Internal Review and Coordination

Once an initial report is received, a member of the Central Office IDDE Team (typically the Illicit Discharge Coordinator) performs an internal review of the information in the report and enters the report into the GIS tracking and reporting database. If sufficient details and photographs are provided in the report, oftentimes an illicit discharge can be confirmed during the Internal Review process.

During the Internal Review, if a potential illicit discharge report is determined to not qualify as an illicit discharge, then the report is closed in the GIS tracking and reporting database.

If an illicit discharge is not confirmed during the Internal Review process, or further information is necessary, a member of the Central Office IDDE Team may perform, or request a district staff person to perform, a Field Investigation.

### 3.2 Field Investigation

Field investigation may be necessary when a potential illicit discharge report does not contain sufficient detail or evidence. Field investigations confirm whether a reported discharge is illicit, characterize the nature of the discharge, and determine the source of the discharge.



*Figure 6. Illicit discharge of oil in a concrete stormwater conveyance ditch.*

UNDER VDOT'S MS4 PERMIT, FLUIDS FROM  
A VEHICULAR ACCIDENT DO NOT NEED TO BE  
TRACKED OR REPORTED THROUGH THE  
IDDE TRACKING AND REPORTING GEODATABASE.

Permit No. VA0092975, Part 1.C.3.d

Potential Illicit discharge reports that originate from the VDOT Call Center/Customer Service Center and any report that comes through the HMMS work order system will have an initial field investigation performed by a VDOT staff member. The HMMS work order is routed

to the appropriate Residency or AHQ for the initial field investigation. In some cases a RHMM, NPDES Coordinator or other qualified staff or consultants may be performing the field investigation.

Field investigations should refer to *VDOT's Illicit Discharge Detection and Evaluation Field Guide (Appendix A)*. Indicators of illicit discharges can include discoloration of storm water, presence of surface scum, oil sheen, unnatural foam, or turbidity (suspended sediment). Other visual clues include the presence of stains, oils, or residues in the water column or at the downstream end of the outfall. A pungent odor emanating from any part of the storm drain system may also be evidence of an illicit discharge.

Several methods can be used by VDOT to trace the source of a confirmed illicit discharge. Tracing techniques include, but are not limited to:

- visual inspections of drainage structures and lines (most common)
- dye testing, damming lines to isolate areas
- indicator monitoring
- smoke testing
- optical brightener monitoring traps

Field investigations rely primarily on visual and olfactory inspection of the storm sewer system surrounding illicit discharge reports. Investigators are **not** to enter private property without proper permission or confined spaces to investigate illicit discharge reports.

On rare occasions, if visual and olfactory characterization of a discharge is insufficient and sampling or complex methods of source identification are needed, Central Office Environmental or District-level staff will assist.

If a reported illicit discharge is located in an area where the storm sewer system is complex and the source is difficult to locate, the site is referred directly to the IDDE Team at [IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov).

## 4.0 ELIMINATING VERIFIED ILLICIT DISCHARGES

The goal of VDOT's Illicit Discharge Detection and Elimination Program is to identify, locate and eliminate illicit discharges to the MS4 as soon as practicable.

In general, following internal review and field investigation, if an illicit discharge is confirmed, VDOT Residency and IDDE Team staff coordinate to either eliminate the illicit discharge to the maximum extent practicable (MEP), or refer the matter to the appropriate enforcement authority. Due to VDOT's limited enforcement authority, a significant number of illicit discharges need to be referred to local, state, or federal regulatory agencies for enforcement and final resolution (Section 4.3).

#### **4.1 Timeline for Follow-Up and Reporting of Illicit Discharges**

Illicit discharges are investigated and reported to the appropriate agencies within the following timeframes:

- Within **24 hours** of the discovery of **any** illicit discharge of sewage through illegal connection into VDOT's MS4, the discharge will be reported to DEQ. (VA0092975 Part I.C.3.b.iv)
- Reports of illicit discharges from the public will be investigated within **5 days** of receipt to the Central Office IDDE Team. (VA0092975 Part I.C.3.b.iii)
- Unauthorized dry weather flows discovered by employees during maintenance of roadways or drainage systems will be eliminated within **30 days** of discovery where elimination is within VDOT's control. (VA0092975 Part I.C.3.b.ii)
- Any illicit discharge where elimination is beyond VDOT's options for legal authority will be referred to appropriate local government, state and/or federal agencies as soon as possible, but no later than **30 days** after discovery. (VA0092975 Part I.C.3.b.i)

See Section 4.3 for more detail on the referral process.

#### **4.2 Internal Processing - VDOT-Responsible Illicit Discharges**

If VDOT is determined to be the responsible party for an illicit discharge within VDOT's right-of-way, VDOT staff will take the necessary corrective action to eliminate the discharge. If an illicit discharge is reported to an IDDE Team member or through the IDDEReports email, a member of the IDDE Team contacts the appropriate VDOT District or Residency staff to coordinate a cleanup effort. If an illicit discharge report goes directly to district staff or a non-IDDE Team member, then a cleanup effort may be coordinated and documentation of the report and resolution provided to the Central Office IDDE Team.

Follow up inspections may be necessary to ensure the discharge to the VDOT storm drain system is eliminated. All actions and resolutions associated with each potential discharge report are documented in the tracking geodatabase (Sections 4.3 and 4.5).

#### **4.3 External Referral – VDOT's Enforcement Authority**

VDOT has limited authority to stop illicit discharges where the responsible party is not VDOT. Therefore, VDOT's IDDE process relies heavily on the jurisdiction of state agencies and local governments, with the power to enforce regulations and ordinances, to assist with certain IDDE resolutions. See Section 4.5 for more information about potential enforcement actions that may be taken by VDOT and/or other regulatory agencies.

When an illicit discharge originates outside VDOT's right-of-way, VDOT staff transfer the report to the appropriate enforcement authority, typically either the locality, the local Health Department, or DEQ. VDOT staff provide all information related to the discharge report including dates, locations, photos, results of screenings and investigations, and identified sources. VDOT staff also request confirmation from the locality or DEQ that the case has been resolved. Central Office IDDE Team members document the associated correspondence in the geodatabase.

Depending on the nature of the discharge, where applicable, VDOT may send a *Land Use Permit Revocation Warning Letter* (Appendix 9 of the Land Use Program Manual) to the violator.

**Table 4** provides a reference list of enforcement authorities based on the type of illicit discharge. Descriptions are based on observations of the IDDE program as well as EPA guidance documents.

**Table 4.** IDDE Enforcement Action Authority

Description of Identified IDDE	Responsible Enforcement Authority
Automotive fluids* (gas, motor oil, diesel, antifreeze)	DEQ
Cooking Oil and Grease	Locality/DEQ
Solvents	DEQ
Paint	Locality/DEQ
Chemical Cleaners (Acid/alkaline-based detergents, soaps, etc.)	Locality/DEQ
Pesticides and Herbicides	DEQ
Salt from VDOT Application (Mis-applied)	VDOT Residency
Landscape Waste (Grass Clippings/Leaves other than incidental)	Locality/VDOT
Fertilizer (Mis-applied)	Locality/VDOT
Sediment from VDOT source	VDOT Residency
Sediment from non-VDOT Source	Locality/DEQ
Gray water (e.g. clothes washing, dishwater)	Health Department (Local)
Septic/Sewer Wastewater	Locality/DEQ
Chlorinated Swimming Pool Discharge	DEQ
Unpermitted Pipe Connection - No discharge or With Discharge	VDOT LUP Section/Health Department (Local)
Notification of a PCB Discharge from an Industrial Source in a TMDL Area	DEQ
Unknown/Other	DEQ

\*Not associated with a vehicular accident



## 4.4 Removal of Illegal Connections

One area where VDOT has some limited legal authority is in the case of an improper/illegal connection to its MS4. In such instances, VDOT may seek to revoke the business or landowner's Land Use Permit (LUP). See Section 4.5 for more information about the Land Use Permit and possible enforcement actions.

Illegal connections to the storm sewer system can be detected utilizing a combination of investigation methods for non-stormwater discharges, such as visual/video inspection, and dye or smoke tracer testing. Dry-weather testing can assist in identification of abnormal conditions such as sporadic or continuous discharge, which also facilitates source tracing.

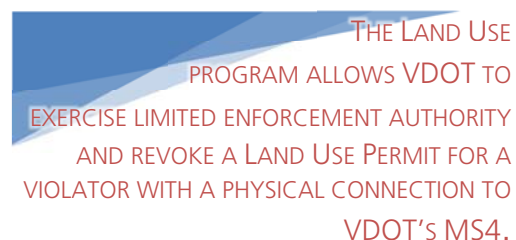
## 4.5 Administrative Action, Enforcement and Penalties

Failure to comply with any of the MS4 permit requirements is prohibited. Any person or entity that violates any of the provisions of the permit may be subject to administrative actions as well as enforcement actions, potentially including fines or criminal prosecution, levied by other agencies. Because VDOT has limited legal authority, any legal action would likely be initiated by a state or federal environmental agency in conjunction with the appropriate law enforcement agency.

In some cases, VDOT may pursue common law trespass as a legal means to stop an illicit discharge. VDOT can pursue limited administrative actions within its authority, such as revocation of a Land Use Permit (LUP) or suspension or revocation of a contract. The VDOT LUP regulations establish the rules that individuals, localities, and companies must meet in order to conduct any work, other than travel, on the systems of state highways and roads that are under VDOT jurisdiction. The LUP will be used by VDOT to assist with the IDDE program as follows:

- Continue to use the LUP Program to eliminate any illegal connections to VDOT's MS4s for any non-stormwater discharge. See Appendix 9 of the LUP Manual for the template of the Notification of Illicit Discharge that can be issued to a permittee of the LUP Program.
- Continue to notify individuals applying for LUPs of the prohibition of discharging any non-stormwater discharges, and refer them to DEQ if a separate VPDES permit is required.

Administrative action is the least desirable outcome of the VDOT IDDE program; however, it may be necessary in the following situations:



THE LAND USE PROGRAM ALLOWS VDOT TO EXERCISE LIMITED ENFORCEMENT AUTHORITY AND REVOKE A LAND USE PERMIT FOR A VIOLATOR WITH A PHYSICAL CONNECTION TO VDOT'S MS4.

- Recurring or egregious illicit discharge incidents;
- Failure of person knowingly responsible for an illicit discharge to notify VDOT or DEQ; or
- Refusal by the responsible party to voluntarily take corrective action on an illicit discharge, once it is brought to their attention.

One or more of the following enforcement actions will be performed for confirmed illicit discharges:



- Upon VDOT verification that the reported incident is a valid illicit discharge, the responsible party can be notified (by letter) of the requirement to correct the illicit discharge and, when appropriate, remediate the area affected by that discharge. Appendix 9 of the Land Use Program Manual provides a form letter for notifying an outside party of illicit discharge violations and possible revocation of a Land Use Permit.
- The appropriate State Authority and/or DEQ will be notified in writing of the illicit discharge in certain cases where the discharge is occurring within a live watercourse.
- VDOT may revoke an LUP or revoke or suspend a contract issued to an outside party for temporary or permanent use of a VDOT right of way should an illicit discharge be detected and not corrected by the responsible party.
- VDOT may refer the complaint to DEQ for further investigation, following their procedures including enforcement provisions in accordance with the Code of Virginia (§18.2-119) as appropriate.

## 5.0 DOCUMENTING IDDE EFFORTS

### 5.1 IDDE Tracking Geodatabase

VDOT staff use information tracking protocols that have been developed, and incorporated into the IDDE geodatabase. The IDDE geodatabase is a cloud-based system on VDOT's ArcGIS Online Account, and overseen by the Location and Design Division. As required by VDOT's MS4 Permit, the following information – at a minimum – should be documented for IDDE investigations:

- date or dates that the illicit discharge was observed and reported;
- results of the investigation;
- any follow-up of the investigation;
- resolution of the investigation; and
- date that the report was closed.

A general description of the status of reports in the IDDE geodatabase is as follows:

**Open** – The report has been received and entered into the tracking geodatabase, but a determination of next steps has not yet been made.

**Closed Out** – When a review or investigation is completed, and no further action is required, the IDDE report is closed out. Examples of reports in a 'closed out' state:

- A contractor is reported dumping leftover drywall mud down a VDOT stormwater inlet. The contractor is contacted and required to clean up the material. After follow up investigation, no residual material remains, and no further action is required. The report is then closed out.
- Following an internal review of photographs, a report of an oily sheen in a waterway is determined to be natural, no further action required. The report is then closed out.



**Figure 7.** VDOT personnel

If the discharge is determined to be a permitted or allowable discharge that information is entered into VDOT's geodatabase, and the report is closed out. This allows the IDDE Team to access this information if future reports are received concerning the same discharge.

**Referred** (External) - The issue was referred to an external authority such as a locality, county or state regulatory agency for enforcement or cleanup activities (see Table 4). Examples of reports in a 'referred' state:

- A used car lot is washing vehicles and degreasing engines in their lot, and the discharge is entering a VDOT drop inlet; the issue is referred to DEQ's regional Pollution Prevention coordinator for resolution
- Septic discharge from a neighboring residential property is discharging into a ditch near a VDOT rest area; the issue is referred to the county health department for resolution

The resolution of an illicit discharge report may be a referral to and acceptance of authority by the VDEQ or local government for action, however, this action must be properly documented by all involved parties.

Once the responsible authority confirms enforcement actions have been initiated, the report enters a 'closed out' state. Additional documentation may still be added to the report, but no further action is required by the part of VDOT.

**Elevated** (Internal) – After review or investigation, an illicit discharge is confirmed and VDOT determined to be responsible party. The report is elevated by the IDDE Team to Residency or other appropriate VDOT staff for clean-up actions.

**Unable to Work** – The reported discharge is physically inaccessible, unable to be located, or investigation of the report would result in a dangerous condition for the inspector.

## 5.2 Annual Reporting to DEQ

VDOT must annually report information pertaining to its IDDE efforts to the VDEQ and EPA (VA 0092975 Part 1.C.g.3). An IDDE summary will be included in the Annual Report and contain:

1. The total number of potential illicit discharges reported and final number of confirmed illicit discharges.
2. The source of any confirmed illicit discharges.
3. Description of follow up actions for each confirmed illicit discharge.
4. When the illicit discharge was referred to DEQ or other government agency, if applicable, and
5. Any determinations from these referrals reported via DEQ or other government agency

Additionally, the Annual Report must include a separate summary of significant spills to VDOT's MS4 in which VDOT was the responsible party. The summary includes a description of the source of each spill, follow-up activities, and steps taken to resolve the incident. (VA0092975 Part I.C.3.d)

## 6.0 IDDE TRAINING

As part of the MS4 Permit, VDOT is to provide training on proper identification and reporting procedures for illicit discharges at least once every five (5) years to VDOT personnel and contractors working within the MS4 regulated area, based on individual job responsibilities (VA0092975 Part I.C.6.h.i). Development and deployment of IDDE training is coordinated through the Environmental Division. In addition, the Environmental Division is responsible for maintenance of the Illicit Discharge Detection and Evaluation Field Guide. A copy of the Field Guide is included in **Appendix A** of this manual.

The following are examples of positions trained in illicit discharge detection, identification and reporting:

- Transportation Operator I – III (Equipment Operators, Truck Drivers, Laborers, Crew Leaders and Contract Monitors)
- Transportation Operations Manager I – III (AHQ Superintendent and Supervisors, Maintenance Operations Managers)
- Trades Technician II – IV (Facilities Managers, Electricians, Facility Technicians and Facility Specialists)
- Equipment Service Repair Technician I-II (Mechanics)
- Equipment Service Repair Manager I – III (Shop Managers)
- Engineering Technician I- IV (Bridge Inspectors)
- Turnkey Asset Management Services (TAMS) Contractors
- Staff designated by the Maintenance Operations Managers, in coordination with the Transportation Operations Managers (e.g. Contract monitors)
- Environmental Specialist I and II
- Environmental Manager I and II
- Appropriate Contractors



The Maintenance Operations Managers (MOM), in coordination with the Transportation Operations Managers (TOM) will determine which of their staff need to receive the training. In addition, any personnel (state forces/contractor) who may encounter illicit discharges to VDOT's storm sewer system should receive the training.

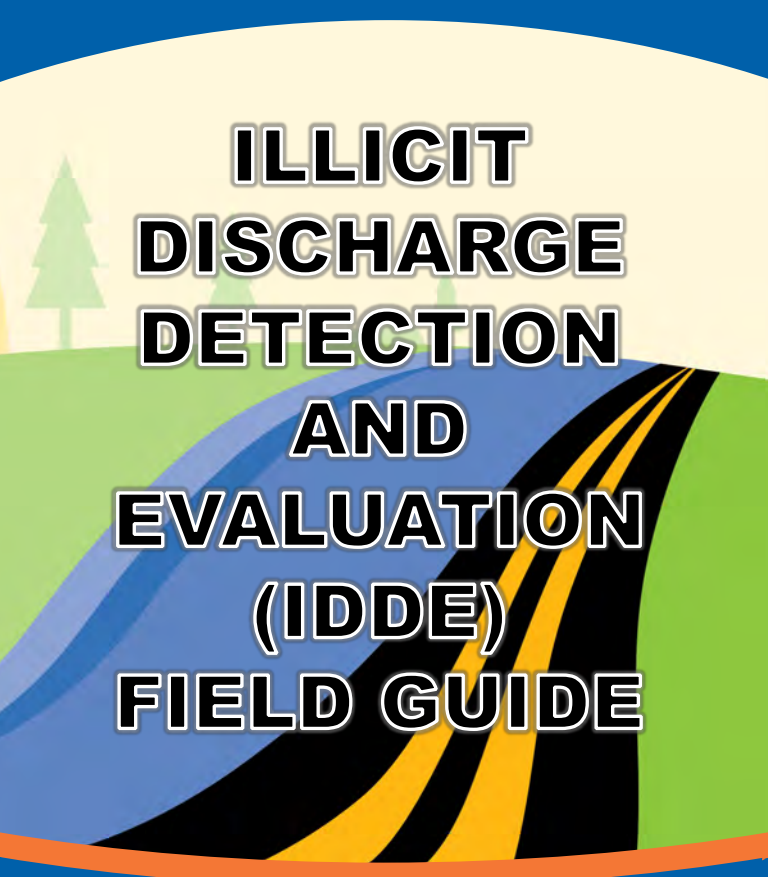
IDDE training is deployed through several methods including, in-person sessions by IDDE Team members, training videos posted on Electronic Bulletin Boards found at every VDOT Facility, online through VDOT University training modules, and VDOT's Training YouTube channel (<https://www.youtube.com/channel/UCD8f3g1w2DUb7Wefva-Dr4A>) or search 'VDOT Illicit Discharge Training').

VDOT's Learning Management System tracks completed IDDE trainings for all VDOT personnel and contractors, and the number of individuals trained in IDDE is reported to DEQ in the MS4 Annual Report.

Detailed IDDE training information can be found in Guide 5.6 of the VDOT Facility Waste Management and Pollution Prevention Guide.

## APPENDIX A – VDOT IDDE FIELD GUIDE

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**ILLICIT  
DISCHARGE  
DETECTION  
AND  
EVALUATION  
(IDDE)  
FIELD GUIDE**







## Quick Reference

**Report Illicit Discharges to:**

**IDDEReports@vdot.virginia.gov**

**Need Additional Guidance?**

**Illicit Discharge Coordinator**

**Env. Compliance Program Manager**

**Facilities Compliance Manager**

**District NPDES/MS4 Coordinator**

**Regional Hazardous Materials Manager (RHMM)**

**The IDDE Program Manual is Available at:**

**[www.virginiadot.org/stormwater](http://www.virginiadot.org/stormwater)**

## **Acronyms and Abbreviations**

<b>BMP</b>	<b>Best Management Practice</b>
<b>IDDE</b>	<b>Illicit Discharge Detection and Elimination</b>
<b>MS4</b>	<b>Municipal Separate Storm Sewer System</b>
<b>NPDES</b>	<b>National Pollution Discharge Elimination System</b>
<b>TOC</b>	<b>Traffic Operations Center</b>
<b>VDOT</b>	<b>Virginia Department of Transportation</b>
<b>VPDES</b>	<b>Virginia Pollution Discharge Elimination System</b>
<b>VSMP</b>	<b>Virginia Stormwater Management Program</b>

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- Documenting Illicit Discharges
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## 1 - Introduction

### Purpose of the IDDE Field Guide

At some point during your work with VDOT, you may encounter (or be asked to investigate) a suspicious substance within, or discharging to or from, the VDOT in the right-of way or a nearby waterway. Such occurrences might be categorized as a potential illicit discharge.



*Courtesy of VDOT Public Affairs*

This Illicit Discharge Detection and Evaluation (IDDE) Field Guide is designed to assist field personnel with detection, investigation, reporting and elimination of illicit discharges to VDOT's regulated Municipal Separate Storm Sewer System (MS4). It is intended to complement the *VDOT Illicit Discharge Detection and Elimination Program Manual*. This guide is intended for use by VDOT field staff and contractors. **This guide should be kept in the work vehicle for use and reference.**

The guide can also be accessed online at:

[www.virginiadot.org/stormwater](http://www.virginiadot.org/stormwater)

## Definition of an Illicit Discharge

VDOT's Municipal Separate Storm Sewer System (MS4) is comprised of various stormwater structures including ditches, curbs and gutters, drop inlets, stormwater pipes, stormwater ponds, etc. The MS4 service area is defined by the 2010 Census Urbanized Areas (CUAs). There are 14 CUAs in Virginia where VDOT's MS4 Permit applies.

An illicit discharge is defined in VDOT's MS4 permit as "any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except discharges pursuant to a VPDES or VSMP permit (other than the VSMP permit for discharges from the municipal separate storm sewer), discharges resulting from firefighting activities, and discharges identified by and in compliance with 9VAC25-870-400 D 2 c (3)"

In short, any substance that is not regular rain water, and enters a VDOT ditch, curb inlet or stream, could be considered an illicit discharge.

### ONLY RAIN DOWN THE DRAIN!



Always be on the look-out for any unusual or potentially unsafe conditions in the field.



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In addition to this field guide, training videos on illicit discharge identification are available on VDOT University or the VDOT YouTube Channel.

For additional technical guidance, refer to the IDDE Program Manual or use the contacts listed in the Quick Reference at the beginning of this guide. You can also contact the IDDE Central Office Team at

**[IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov)**.

## Examples of Illicit Discharges

The following are examples of common illicit discharges reported to VDOT. Examples with a  next to them **are** illicit discharges, while those with a  are allowed discharges.

**Oil and Fuel from Vehicles and Equipment** - including gasoline, motor oil, diesel fuel, antifreeze. For clarification, oil and fuel spills related to vehicle or other roadway accidents are **not** considered to be illicit discharges, and do not have to be formally reported as IDDE incidents.



Oil sheen from illicit discharge in concrete-lined storm-water ditch.



Illicit discharge of antifreeze into storm sewer system.

## Cooking Oil and Grease



## Paint/Plaster/Concrete Washout



## Chemical Cleaners - detergents, soaps, etc.





**Mis-Managed/Excess Road Salt** - when mis-applied/over-applied and excess ends up in stormwater system.



**Landscape Waste** - grass clippings and leaves *intentionally* blown or dumped into storm drains.



These are considered illicit discharges IF they enter the VDOT storm sewer system.

**Sediment** - whether from construction or other land-disturbing sources



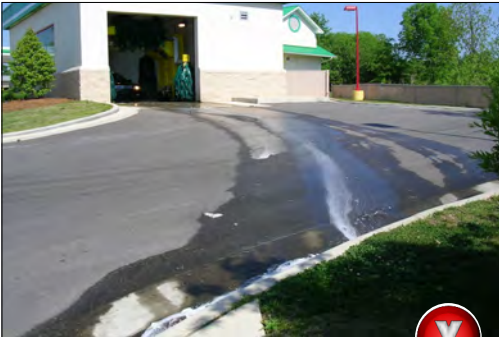
**Gray Water** - sanitary wastewater from showers, sinks, dishwashers, washing machines, etc.



**Septic/Sewer Wastewater**



**Commercial/Industrial Vehicle Wash Water**



**Other Illicit Discharges:**

**Solvents** - paint thinners, parts cleaners

**Fertilizer, Pesticides and Herbicides** - when mis-applied and excess ends up in streams.

**Chlorinated Swimming Pool Discharges**

The following are *not* Illicit Discharges and are ALLOWED under VDOT's MS4 Permit.

**Water Line Flushing**



**Landscape/ Agricultural Irrigation**



**Air Conditioning Condensation**





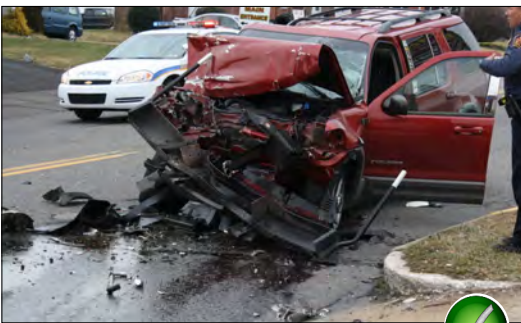
## Foundation/Foot Drains & Crawl Space Sump Pumps



### Firefighting Activities



### Spills from Vehicle Accidents\*



\*Discharges from accidents are of concern, but VDOT's MS4 permit doesn't require tracking and reporting of these as they are discrete occurrences that can't be totally eliminated.

## Residential Car Washing



**Street Wash Water (including Bridge Washing)**



### **Other ALLOWABLE Discharges:**

- Discharges from Potable Water Sources**
- Dechlorinated/Desalinated Swimming Pool Discharges**
- Springs/Rising Groundwater/Uncontaminated Groundwater Discharge**
- Diverted Stream and Flows from Wetlands**



While residential car washing is allowed, all VDOT equipment must be washed in approved locations like a wash pad or wash bay.

## 2 - Identifying Illicit Discharges

Below are some characteristics of pollutants that aid in determining whether a discharge is illicit.

### Odor

Odor can be a strong indicator of an illicit discharge. You may be able to smell an illicit discharge before you can detect it with your eyes. Some common odors associated with illicit discharges are:

**Fuel or Chemical Smell** - can indicate dumped or released products have entered the storm sewer system.

**Sewage or Rotten-Egg Smell** - can indicate an illicit discharge of sewage or failing septic system.

**Chlorine or Floral Smell**- can indicate an illicit discharge of fertilizer, detergent, or other cleaners.

**DO NOT** enter confined areas such as culverts, drop inlets, manholes, etc. to investigate the origin of odors. Gases may accumulate in these areas that can overcome the entrant.



It is important to recognize the difference between unusual *natural* phenomenon and *man-made* pollution.

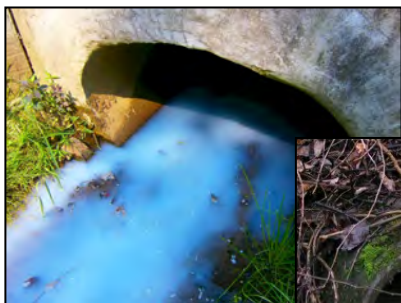
## Color

Any odd or unusually-colored water should be noted. Turbid, cloudy water may indicate the presence of excessive siltation or other pollutants entering storm water.

**White, Milky, Grey, Cloudy** - usually associated with an illicit sewage discharge. Typically a discharge of sewage will be accompanied by an unpleasant odor.

**Brown or Muddy** - muddy or turbid water when it has not recently rained, or that appears muddier than different parts of the area on the same day, can indicate an illicit sediment discharge.

**Unnatural Colors** - Paint, dyes, and industrial chemicals come in a wide variety of colors, and would be considered an illicit discharge if observed in the storm sewer system.





### Staining/Discoloration

Stains that are an unnatural color, have a sheen or odor, do not follow a normal flow path, or appear to come from a source other than normal stormwater runoff, could indicate a potential illicit discharge.



### Foam

Many instances of foam are natural. Natural foam may appear white at first, but generally turns brown over time.

Foam that is white and has a sweet or scented odor is likely to be manmade. Sources of such foam could be detergents, soaps or shampoos.

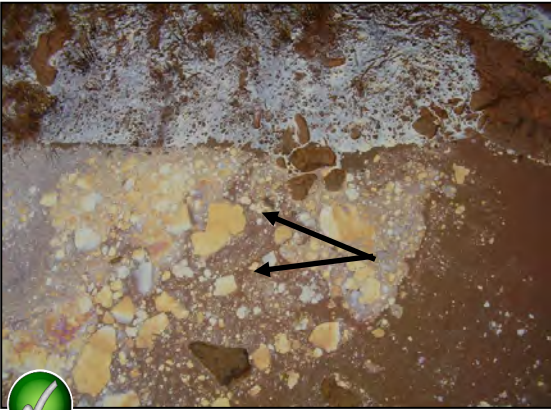


## Sheen

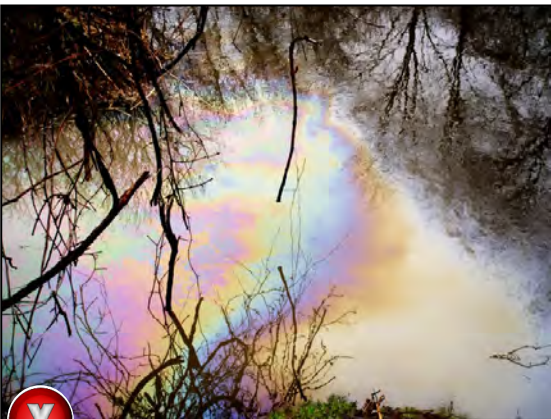
A sheen may or may not be the result of an illicit discharge. Sheens due to naturally-occurring bacteria or organics are not indicative of illicit discharges. Oil sheens require IDDE reporting. In general, a sheen's origin can be determined by disturbing it:

- If the sheen breaks up into platelets or clumps, it is likely to be natural in origin.
- If the sheen swirls (separates) and reforms (re-adheres), oil is likely present on the water.

Additionally, oil sheens often appear thicker and more fluorescent and iridescent.



Nonpetroleum Sheen - breaks apart into clumps with jagged edges.



Oil Sheen - swirls and re-adheres if mixed.

### Stressed/Dead Fish

Fish kills may be caused by naturally low dissolved oxygen levels, lakes and streams freezing over, diseases, **or** polluted runoff. Nevertheless, if a large population of dead or stressed fish are observed, a potential illicit discharge should be reported.



### Stressed Vegetation

Discharges of chemicals can cause vegetation to become stressed or die. Stressed or dead vegetation in areas where you would expect healthy vegetation could be an indication of an illicit discharge.



The previous examples are just *some* of the common field conditions associated with illicit discharges.

## Iron Oxidation - NATURALLY OCCURRING PHENOMENON

During daily field activities, you may come across an orange-brown growth in pipes, outfalls, and streams. It can appear as an orange, brown, red, yellow or grayish gelatinous slime, a stain, or as a “feathery” filamentous growth. There might also be a rainbow sheen to it. While unsightly, this growth is from iron-oxidizing bacteria, which are **naturally-occurring** in the soil and oxidize dissolved iron or manganese found in groundwater.

The presence of iron bacteria does not indicate an illicit discharge.





## 3 - Investigating Suspected Illicit Discharges

### Determining the Source of a Suspected Illicit Discharge

**Safety Reminder:** Always follow VDOT safety guidance when investigating an illicit discharge found in the VDOT drainage system.

- 1) **Inspect** the area and determine which direction stormwater would flow around the area of the discharge.

Note drainage pathways in surrounding area. Does stormwater flow into a ditch, a curb inlet, or directly into a stream?

If drainage pathways are difficult to trace, contact the Central Office IDDE team to help conduct a field investigation.



After observing the surrounding area, investigators identified that stormwater from the majority of this lot flows towards this drop inlet.

- 2) **Track** the discharge to the point it enters and exits the VDOT storm sewer system.

Don't forget to check upstream areas! If needed, use a manhole puller (if available) to check nearby storm drains.

3) After identifying the point of entry, attempt to **determine** the discharge source.

Check the origins of nearby pipes and culverts for pollutants contributing to the observed discharge

Common sources include: sediment from improperly controlled construction sites, leaking equipment or containers, and businesses intermittently dumping waste down inlets.

### Illicit Connections

Illicit connections to the storm sewer system can be a source of illicit discharges. Illicit connections include things like tapping a sanitary sewer line from a house directly into a storm sewer line, or running a pipe that discharges water from a washing machine or sink to a roadside ditch.



## Containers

Abandoned containers, such as drums and buckets, may contain hazardous materials and should be avoided. Do **NOT** open containers. Contact your Regional Hazardous Materials Manager and/or the TOC for assistance.



**DO NOT** enter private property to investigate the source of a discharge.

4) **DOCUMENT** - take good photos and **document** observations. Also note the location the possible pollutant enters VDOT's Right of Way (See Ch. 3 Documenting and Reporting an IDDE for more details on proper documentation).

### Example:

A homeowner called a VDOT Residency to report an unpleasant, suspicious odor in a VDOT-maintained ditch near the location shown in the adjacent photo.

The Residency sent an email to [IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov) and then deployed a maintenance crew worker to the site to perform a field investigation. The investigator confirmed a noxious rotten-egg smell coming from the ditch.





The investigator also noticed excessive vegetation growing in the ditch line, that was abnormal based on the time of year.

The investigator followed the smell and traced the excessive vegetation in the ditch line to a sanitary sewer manhole. Thus the source of the illicit discharge was determined to be a leaking sanitary sewer line.

After notifying the Central Office IDDE team of the confirmed illicit discharge, it was then reported to the local health department for repairs to the sanitary sewer system.

If a suspected illicit discharge is located in an area where the storm sewer system is complex and the source is difficult to locate, the site should be referred to the  
Central Office IDDE team at  
**[IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov)**.



## 4 - Documenting and Reporting Illicit Discharges

**Important: If the suspected illicit discharge results in (or is the result of) an emergency situation, immediately find a safe and secure location. Then, call your local emergency response group prior to attempting to collect any other information or documentation related to the discharge.**

**REMEMBER: SAFETY FIRST!!**

All reports of *potential* illicit discharges and any field investigations **must** be documented in the IDDE database managed by the Central Office IDDE Team.

With that in mind, timely reporting and proper documentation of potential illicit discharges is important. The following are some guidelines for what kind of documentation to provide if you encounter a potential illicit discharge.



Detailed reports about a discharge help identify the proper authority to contact, so the discharge can be quickly eliminated.

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### Documenting Illicit Discharges

Good documentation is important to quickly resolve an illicit discharge report. The following pieces of information are necessary to submit an accurate illicit discharge report.

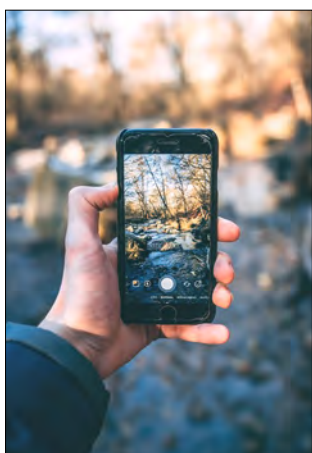
#### Location

- ◇ Structure Numbers (if applicable)
- ◇ Street Addresses
- ◇ Directions (N,S,E,W)
- ◇ Distances

Example: 50ft SW of BMP 8763 outfall, near Broad St. and 14th.

## Description

- ◇ Color - what color is the discharge?
- ◇ Smell - does the discharge any odor?
- ◇ Nearby Activities and Businesses (e.g. a car wash near a ditch that appears to contain soapy suds, active construction near a stream filled with sediment?)
- ◇ Source - have you been able to detect the source of the discharge? (see Ch.2 Identifying IDDEs)



## Timeline & Extent

- ◇ Date & Time of initial discharge discovery
- ◇ Date & Time you made your observations (if performing a follow-up field investigation)
- ◇ Frequency of discharge, if known (i.e. has this discharge been observed in the past?)
- ◇ Area Discharge Affects (sq. ft. or linear ft.)

## Photographs

Photos are important evidence for documenting an illicit discharge.

In addition to close-up detailed photos of the discharge, take photos that capture the outfall and surrounding area (aka “The Big Picture”).

“Close-Up” photos provide good detail of the discharge; however it is difficult to determine the true scale or location of the issue viewing only these types of photos .

“Big Picture” photos give the investigator perspective as to the nature and severity of the discharge. It provides a frame of reference for anyone who has to evaluate the report and/or perform a follow-up investigation.

The following photos provide an example of “Close-Up” and “Big Picture” photos.



“Close Up” photo of discharge of oily substance from pipe. Provides good detail of the nature of the illicit discharge.



“Big Picture” photo of the pipe and partially filled culvert from which the illicit discharge originates. Provides evidence that can help identify the source of the discharge.



**‘Upstream’ and ‘Downstream’ photos are important and can document the source and extent of a suspected discharge.**

## Reporting Illicit Discharges

**Important: If the suspected illicit discharge results in (or is the result of) an emergency situation, immediately find a safe and secure location. Then, call your local emergency response group prior to attempting to collect any other information or documentation related to the discharge.**

**REMEMBER: SAFETY FIRST!!**

If you encounter any of the conditions previously mentioned in this field guide, or you suspect an illicit discharge is occurring, here are the steps you should follow to report an illicit discharge.

Use information in the previous section *Documenting Illicit Discharges* to safely **obtain all of the information** you can about the discharge.

Next, **contact your crew leader, supervisor or superintendent** and inform them you suspect an illicit discharge is occurring in VDOT's Right-of-Way. Provide all documentation you collected to your supervisor.

### **Crew Leaders, Supervisors and Superintendents**

**Send an email to [IDDEReports@vdot.virginia.gov](mailto:IDDEReports@vdot.virginia.gov)**

to notify the Central Office IDDE Team. Include all documentation collected in the field. This will trigger the creation of a report in the IDDE database, and will likely include follow-up calls from the Illicit Discharge Coordinator.



## Online Reporting

In development, check  
[www.virginiadot.org/stormwater](http://www.virginiadot.org/stormwater)  
for updates.

## APPENDIX B – POINTS OF CONTACT RELATED TO IDDE

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<b>VDOT – Points of Contact</b>		
VDOT Call Center		(800) 367-7623
State Stormwater Program Administrator		(804) 786-9013
Environmental – IDDE Coordinator	IDDEReports@vdot.virginia.gov	(804) 837-0022
<b>MS4 Localities – Points of Contact</b>		
<b>Bristol District</b>		
City of Bristol	City Engineer	276-642-2316
Town of Abingdon	Jr. Civil Engineer	276-492-2142
<b>Culpeper District</b>		
County of Albemarle	Water Resource Program Manager	434 296-5816 Ext. 3410
Piedmont VA Community College	Facilities	(434) 961-5447
Fauquier County	Community Development	540-422-8210
Fauquier County Schools	Fauquier County Schools	540-422-7201
Fauquier County	Parks and Recreation Department	540-422-8550
Fauquier County	General Services Department	540-422-8484
Town of Warrenton		540-347-6574
University of Virginia	Environmental Programs Manager & Associate Director – Environmental Resources / Facilities Management	434 982-4901
<b>Fredericksburg District</b>		
City of Fredericksburg	Stormwater Administrator & Environmental Planner, Planning Dept.	540 372-1179
County of Stafford	Stormwater Program Coordinator Stafford County Department of Public Works - Environmental Division	(540) 658-8835
Germanna Community College – Fredericksburg Campus	Germanna Facilities Manager	540 423-9046
Stafford County School Board	Stafford County School Board	540 654-9001
University of Mary Washington	Capital Outlay Project Manager	540 654-2100
Virginia Institute of Marine Science	Chief Operations Officer	804 684-7097
<b>Hampton Roads District</b>		
Chesapeake City	Environmental Quality Coordinator/Public Works	757-382-6919
Christopher Newport University	Director/Grounds	757-594-8416
City of Poquoson	City Engineer/Department of Engineering	757-868-3040

City of Suffolk	Environmental Programs Manager	757-514-7678
City of Williamsburg	City Engineer	757-220-6140
College of William and Mary	Director of Operations and Maintenance	757-221-1205
County of James City	Stormwater Director/General Services Department	757-259-1440
County of York	Stormwater Programs Manager	757-890-3831
DMHMRSAS-Eastern State Hospital	Director of Operations	757-208-7837
Fort Monroe Authority	Archeology and Environmental Coordinator	757-251-2756
Hampton City	Project Manager/Public Works	757-728-2038
Hampton City	SW Civil Engineer/Public Works	757-303-4162
Newport News City	Environmental Compliance Administrator/Engineering	757-933-2358
Norfolk City	Environmental Programs Manager/Public Works	757-823-4005
Norfolk City	Environmental Engineer/Public Works	757-823-4048
Old Dominion University	Director/Environmental Health and Safety	757-683-5817
Portsmouth City	Director/Public Works	757-393-8666
Thomas Nelson Community College	Building/Grounds Supervisor	757-825-2937
US Navy - Consolidated MS4s	MS4 Water Program Manager/NAVFAC MIDLANT	757-341-0423
Virginia Beach City	VPDES MS4 Administrator/Public Works	757-385-8593
William and Mary	Environment, Health, & Safety Office	757-221-2146
Williamsburg	City Engineer/Department of Public Works	757-220-6140
<b>Lynchburg District</b>		
City of Danville	Public Works Chief Engineer	434-799-5019
Central Virginia Training Center	Physical Plan Services Director	434-947-6958
City of Lynchburg	Water Quality Manager/Department of Water Resources	434.455.3869
CVCC	Facilities Management	434-832-7740
Danville Community College	Architect	434-770-4892
<b>Northern Virginia District</b>		
City of Falls Church		703-248-5026
City of Manassas		703-257-8228
City of Manassas Park		703-335-8840
Fairfax (City)	Stormwater Resource Engineer/Department of Public Works	703-273-3067
Fairfax County	Ecologist II/ Stormwater Planning Division	703-324-5885



Fairfax County Public Schools		703-764-2477
George Mason University		703-993-4051
Herndon	Senior Civil Engineer/ Department of Public Works	703-435-6853
Leesburg	Deputy Director/Public Works	703-771-2743
Loudoun	Chief/ Stormwater Management	571-258-3227
Metropolitan Washington Airport Authority		703-572-0253
Northern Virginia Community College		703-323-3065
Prince William	Chief/Environmental Services	703-792-4064
Prince William County Public Schools	Environmental Coordinator/ Office of Facilities Services	703-791-8801
Town of Dumfries		703-221-3400, ext 119
US Army Ft Belvoir		703-806-3406
Vienna	Deputy Director/ Public Works	703-255-6389
<b>Richmond District</b>		
Ashland, Town of	Town Engineer	804-798-9219
Chesterfield	Water Quality Manager	804-768-7435
City of Richmond	Operations Manager	804-646-6964
Colonial Heights, City of	Project Coordinator	804-520-9334
Hanover	Director of Public Works	804-365-6179
Henrico	Senior Engineer	804-501-7475
Hopewell	Stormwater Program Manager	804-541-2316
Petersburg	Stormwater Program Manager	804-733-2357
<b>Salem District</b>		
Blacksburg	Town Engineer	540-961-1124
Christiansburg	Environmental Program Manager/Engineering Department	540-382-6120 x 1158
City of Radford	Eng. Technician-Temp contact until new City Engineer is hired	540-731-3604
City of Roanoke	Water Quality Administrator	540-853-5910
City of Salem	City Engineer	540-375-3032
County of Botetourt	Development Services Manager	540-928-2070
County of Montgomery	Director of Engineering and Regulatory Compliance	540-394-2090
County of Roanoke	Stormwater Program Manager	540-772-2036
Town of Vinton	Planning and Zoning Director	540-983-0601
Virginia Tech	Water Resources Specialist/ Site and Infrastructure Development	540-231-3716
Virginia Western Community College	Director of Planning and Development	540-857-6481
<b>Staunton District</b>		

Augusta County	MS4 and Environmental Manager	540-245-5700
City of Waynesboro	Stormwater Program Manager	540-942-6624
City of Winchester	Stormwater Engineer	540-667-2376
County of Frederick Public Schools	Assistant Director of Facilities Services	540-667-4865
Harrisonburg	Stormwater Permit Coordinator	540.434.5928
JMU	Stormwater Coordinator	540-568-7606
Staunton	Stormwater Engineer	540-332-3858
<b>Agency – Points of Contact</b>		
DEQ	Pollution Response & Preparedness Program	(804) 698-4000
Emergency Notification		911
National Response Center		(800) 424-8802