

Town of Paradise Valley

Illicit Discharge Detection and Elimination Manual

(September 2018)



**PREPARED FOR:
TOWN OF PARADISE VALLEY
6401 EAST LINCOLN DR.
PARADISE VALLEY, AZ 85253**

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Town of Paradise Valley IDDE Manual

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Abbreviations / Acronyms

AAC	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
AZPDES	Arizona Pollutant Discharge Elimination System
BMP	Best Management Practice
CFR	Code of Federal Regulations
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measure
MEP	Maximum Extent Practicable
MS4	Municipal Separate Storm Sewer System
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SAP	Sampling and Analyses Plan
SWMP	Storm Water Management Plan (also referred to as a Storm Water Management Program)
TMDL	Total Maximum Daily Load
WUS	Waters of the United States

1.0 INTRODUCTION

1.1. PERMIT BACKGROUND

The Town of Paradise Valley (Town) is regulated under the Arizona Pollutant Discharge Elimination System (AZPDES) permitting program because it owns and operates a small MS4 (municipal separate storm sewer system). MS4s (as defined in 40 Code of Federal Regulations [CFR] §122.26[b][8]) include any publicly owned conveyance or system of conveyances used for collecting and conveying stormwater that discharges to “waters of the United States” (WUS).

The Town submitted a Notice of Intent (NOI) to the Arizona Department of Environmental Quality (ADEQ) in March 2017 signifying its compliance under AZPDES general permit No. AZG2016-002. This permit requires the Town to develop a written Illicit Discharge Detection and Elimination (IDDE) program.

1.2. MONITORING REQUIREMENTS OVERVIEW

AZPDES general permit No. AZG2016-002 requires the Town to develop an IDDE program to include the following:

- Visual dry weather outfall monitoring
- Visual stormwater discharge monitoring
- Follow-up screening

The intent of this manual is to assist the Town in implementing an IDDE program to meet the above requirements and to systematically find and eliminate sources of non-stormwater to its MS4 and to implement procedures to prevent illicit connections and discharges.

1.3. ENFORCEMENT AUTHORITY

The Town has stormwater enforcement authority that complies with AZPDES general permit No. AZG2016-002. The enforcement authority prohibits illicit discharges and provide the Town authority to investigate suspected illicit discharges, eliminate illicit discharges, including discharges from properties not owned or operated by the MS4 that discharge into the MS4 system and implement appropriate enforcement procedures and actions.

1.4. PROGRAM RESPONSIBILITIES

Responsibility of the IDDE program will be mainly within the Engineering Department with other departments assisting as needed. The table below identifies responsibilities with regard to eliminating illicit discharges:

Program Responsibilities

Name	Title	Department	Responsibility
Paul Mood, P.E.	Town Engineer	Engineering	Provide resources to staff for conducting IDDE activities
Hugo Vasquez	Hillside Development Administrator	Engineering	Implement IDDE requirements and oversee program
Chris Martinez	Senior Engineering Technician	Engineering	Perform dry weather outfall and wet weather visual discharge monitoring; Respond to illicit discharge complaints

1.5. ALLOWABLE AND NON-ALLOWABLE DISCHARGES

An illicit discharge is identified as any discharge to a municipal separate storm sewer that is not composed entirely of stormwater except for the following:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground waters
- Uncontaminated ground water infiltration
- Uncontaminated pumped groundwater
- Discharges from potable water sources
- Foundation drains
- Air conditioning condensate
- Irrigation water
- Springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual residential car washing
- Discharges from riparian habitats and wetlands
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

2.0 DRY WEATHER OUTFALL MONITORING

The primary objective of dry-weather monitoring is to detect and eliminate inappropriate, illicit dry-weather discharges to and from the Town’s MS4. Dry-weather monitoring, or field screening, will result in numerous outfalls being investigated or “screened” at least once each year to identify illicit connections and illegal dumping activity. Outfalls where non-stormwater flows are detected shall be monitored at a higher frequency to identify and/or eliminate the discharge source.

Elimination of illicit connections and illegal discharges is a multi-step process that includes identifying source(s), education and/or enforcement, best management practice implementation, and follow-up investigations. It is important to return to the site once the source has been eliminated to confirm that the source was identified correctly and that dry-weather flow has stopped.

2.1. MONITORING SITE LOCATIONS

Dry-weather field screening will be conducted at outfalls to the Indian Bend Wash (IBW) and Arizona Canal Diversion Canal (ACDC) as discussed below.

2.1.1. Outfalls to IBW

The following outfalls to the IBW will be included in dry-weather outfall monitoring:

Outfalls to the IBW

ID	Lat-Long (NAD 83)		UTM (NAD 83)		Description
	Longitude	Latitude	Easting (m)	Northing (m)	
OF-1	111° 57' 46.519" W	33° 34' 24.724" N	410,632.7	3,715,287.3	East side 9497/9515 N. 55th St.
OF-2	111° 57' 44.969" W	33° 34' 21.128" N	410,671.6	3,715,176.1	East side 9403/9455 N. 55th St.
OF-3	111° 57' 23.532" W	33° 34' 13.622" N	411,222.2	3,714,939.9	South side 9200 N 58th St./5801 E. Sanna St.
OF-4	111° 57' 6.98" W	33° 34' 5.208" N	411,646.5	3,714,676.8	South side 5909 E. Sanna St./9000 N. 60th St.
OF-5	111° 56' 56.120" W	33° 33' 59.645" N	411,924.9	3,714,502.9	South Side 6011/6025 E. Horseshoe Rd.
OF-6	111° 56' 25.979" W	33° 33' 44.270" N	412,697.8	3,714,022.3	South side 8624/8636 N. 64th Pl.
OF-7	111° 56' 20.043" W	33° 33' 26.745" N	412,845.9	3,713,481.1	End of N. 68th St. between 8281 N. Elmaro Cir. and 6602 E. Maverick Rd.
OF-8	111° 55' 43.005" W	33° 33' 11.256" N	413,796.7	3,712,995.5	615 ft east of E. Northern Ave. and N. Golf Dr.
OF-9	111° 58' 8.812" W	33° 33' 27.043" N	410,041.3	3,713,516.1	Northwest side of 8206 N. 53rd St.

2.1.2. Outfalls to ACDC

The following outfalls to the ACDC will be included in dry-weather monitoring:

Outfalls to the ACDC

ID	Lat-Long (NAD 83)		UTM (NAD 83)		Description
	Longitude	Latitude	Easting (m)	Northing (m)	
OF-10	111° 59' 46.769" W	33° 31' 1.756" N	407,472.4	3,708,965.4	North side of 3901 E. Stanford Dr.
OF-11	111° 58' 55.921" W	33° 31' 26.106" N	408,791.3	3,709,802.8	South side of 4554 E. MacDonald Dr.
OF-12	111° 58' 40.853" W	33° 31' 36.370" N	409,183.0	3,710,115.3	Northwest corner of 4769 E. Valley Vista Ln.
OF-13	111° 58' 20.313" W	33° 31' 36.536" N	409,712.9	3,710,115.4	South side 5020/5030 E. Valley Vista Ln.

2.2. MONITORING FREQUENCIES AND PARAMETERS

Dry-weather field screening consists of three types of monitoring: 1) qualitative field screening observations of physical and biological conditions, 2) flow measurements if flowing discharges are present, and 3) analytical monitoring if flowing discharges are present. Following is a detailed discussion of each.

2.2.1 Qualitative Observations

Qualitative field observations must be made and documented on the Visual Monitoring Report Form (Attachment A) during each site visit, and photographs should be taken. Observations can be categorized as a) non-flowing, b) evidence of past discharge, c) flowing discharge, or d) flowing discharge from obvious source. General field observations to be made during each site visit for all categories of discharge include the following:

- Location, type and condition of the outfall
- Presence of floatables
- Visible deposits or staining
- Vegetation conditions
- Weather conditions
- Time since last rainfall

2.2.2 Flow Measurements

Flow measurements should be obtained during each site visit at sites with flowing discharges. The discharge rate can be measured using either a permanent flow measurement instrument or field methods. These measurements can be useful for the following:

- Estimating pollutant mass loading
- Prioritizing outfalls for future investigation
- Identify significant changes in discharge that may be indicative of an illegal release upstream

Flow measurements and methods should be documented on the dry-weather field screening data sheet.

2.2.3 Visual Attributes

A narrative description of the following information shall be recorded on the field data sheet at each monitoring site where flowing water is present:

- Water color
- Odor
- Turbidity
- Presence of an oil sheen, surface scum, foam, or other floatables
- Any other relevant observations regarding non-storm water discharges or illegal dumping

2.2.4 Analytical

In addition, to help identify the source of the discharge, grab samples may be collected for field or laboratory analysis of water quality indicator parameters. Indicator parameters can be used to identify a specific discharge or discriminate between different discharges. A narrative description of the results of indicator parameter analysis and methods used shall be provided on the field data sheet. Suggested indicator parameters include the following:

Lab Parameters

- Bacteria (Total Coliform, Fecal Coliform, E. coli, or Enterococcus)
- Detergents
- Surfactants
- Boron
- Optical Brighteners
- Ammonia-N
- Potassium
- Fluoride
- Chlorine

Field Parameters

- Hardness
- Conductivity (TDS)
- Turbidity
- pH
- Temperature

Many of the indicator parameters can be measured in the field and are an excellent screening tool to indicate, or rule out, potential sources of discharge. Field measurements are a quick way to evaluate and investigate dry-weather flows; however, there may be times when it is necessary to verify the field test results by collecting and submitting samples to an analytical laboratory. Indicator parameters vary across different communities, and no single analysis is adequate to identify a source. To help distinguish one type of illicit discharge from another, a combination of indicator parameters should be selected based on local conditions and discharge types.

2.3. SAMPLE COLLECTION TIME FRAMES

If the source of a dry-weather flow cannot be identified during the initial visit, two grab samples will be collected within a 24-hour period. A minimum period of 4 hours between each sample collection is required to determine if there is any change of potential pollutants over time.

2.4. FOLLOW-UP SCREENING

The Town will conduct a follow-up screening for dry weather flows after it has been identified and eliminated (if applicable). The follow-up will be conducted within 6 to 8 weeks of identification to determine if the source has been eliminated or if further action is required. The table presents required follow-up actions that must be taken for each category of observation.

Follow-Up Screening Requirements

Category	Action
Non-flowing, no ponded water	<ul style="list-style-type: none"> • Document general field parameters on field data sheet
Non-flowing, non-ponded water But evidence of past discharge	<ul style="list-style-type: none"> • Document general field parameters on field data sheet • Continue to monitor as necessary to identify and/or eliminate the source
Flowing discharge	<ul style="list-style-type: none"> • Document general field parameters on field data sheet • Conduct source investigation within 15 days • Perform analytical monitoring if source cannot be readily identified • Conduct follow-up screening 6-8 weeks once source eliminated
Flowing discharge from obvious source	<ul style="list-style-type: none"> • Document general field parameters on field data sheet • Immediately begin efforts to eliminate discharge • Conduct follow-up screening 6-8 weeks once source eliminated

3.0 VISUAL STORMWATER DISCHARGE MONITORING

The Town will conduct visual stormwater discharge monitoring as required by the Permit. The following section describes the activities the Town will implement to conduct the monitoring.

3.1. VISUAL MONITORING SCHEDULE

The Town will conduct visual stormwater discharge monitoring two times during the summer wet season and two times during the winter wet season (four events per year total). Wet seasons, for the purposes of visual assessments, are defined as follows:

- Summer Wet Season: June 1 – October 31 (two events during summer season)
- Winter Wet Season: November 1 – May 31 (two events during winter season)

Visual examination will occur when discharges resulting from a qualifying rainfall event (defined as an event that produces 0.1 inches or more in measured rainfall, causes runoff to be present at the facility, and occurs at least 72 hours from the previous 0.1-inch rainfall event). Grab samples for visual examination must be collected in the first 30 minutes of the discharge. If the collection of a grab sample during the first 30 minutes is impracticable, a grab sample can be collected as soon as practicable after the first 30 minutes. In this event, a description of the reason why a grab sample during the first 30 minutes was impracticable must be thoroughly documented. Visual examinations will be conducted during daylight hours in a well-lit area to accurately observe and document the results.

3.2. VISUAL MONITORING LOCATIONS

The Town has selected the following five (5) locations to conduct visual stormwater monitoring:

Visual Monitoring Locations

ID	Lat-Long (NAD 83)		UTM (NAD 83)		Description
	Longitude	Latitude	Easting (m)	Northing (m)	
OF-1	111° 57' 46.519" W	33° 34' 24.724" N	410,632.7	3,715,287.3	East side 9497/9515 N. 55th St.
OF-3	111° 57' 23.532" W	33° 34' 13.622" N	411,222.2	3,714,939.9	South side 9200 N 58th St./5801 E. Sanna St.
OF-5	111° 56' 56.120" W	33° 33' 59.645" N	411,924.9	3,714,502.9	South Side 6011/6025 E. Horseshoe Rd.
OF-7	111° 56' 20.043" W	33° 33' 26.745" N	412,845.9	3,713,481.1	End of N. 68th St. between 8281 N. Elmaro Cir. and 6602 E. Maverick Rd.
OF-12	111° 58' 40.853" W	33° 31' 36.370" N	409,183.0	3,710,115.3	Northwest corner of 4769 E. Valley Vista Ln.

A map showing the monitoring locations is provided in Attachment B. These locations were selected due to the types of areas they drain (residential, airport, commercial, mixed use), accessibility, and consideration for safety of the person conducting the monitoring.

3.3. VISUAL MONITORING PARAMETERS

Grab samples will be examined in a clear container and observed for the following parameters:

Color – Water that is colorless lacks pollutants that affect water color. Water that is slightly milky or light brown in color usually indicates the presence of suspended sediment. Suspended sediment will impart the same color to water as the surrounding soil. The presence of a color that is different from the surrounding soil color may indicate the presence of a chemical pollutant.

Odor – Most water is either odorless or has a slight “earthy” odor. Odors such as gasoline fumes, solvents, sulfur or rotten eggs, sewage, or a sour smell may be indicative of chemical pollutants.

Clarity – Clarity refers to the amount of suspended material present that causes the water to be opaque and limits the amount of light that can pass through the water. The cloudier the water is, the more likely it is to contain suspended material.

Floating solids – Solids may float if they are buoyant in water. Observe the surface of the grab sample for floating solids and describe them.

Settled solids – Solids may settle to the bottom if they are heavier than water. Observe the bottom of the grab sample for settled solids and describe them.

Suspended solids – Solids may remain in suspension if they have the same buoyancy as water or if their physical shape allows them to remain in suspension for long periods of time.

Foam – The presence of foam on the water surface may indicate the presence of industrial foaming agents or surfactants.

Oily sheen – An oily sheen is present if a film of iridescent color is observed on the water surface. Look for a rainbow effect that can appear to be floating on the surface of the water. Usually an oily sheen indicates the presence of oil or grease. On rare occasions, and usually in the fall, an oily sheen can be the result of the decomposition of fallen leaves.

Other indicators – Any other indicator of a pollutant that does not fall under any of the other categories will be noted.

3.4. VISUAL MONITORING DOCUMENTATION

The results of the visual examination will be recorded on the Visual Monitoring Report Form (Attachment A) and must include the following information:

- Location name
- Date and time of examination

- Monitoring personnel
- Monitoring point location
- Nature of discharge (rainfall or snowmelt)
- Time the rainfall event began
- Duration of the rainfall event
- Inches of rainfall from the rainfall event
- Length of time since the last qualifying rainfall event
- Description of the nine visual examination parameters

3.5. INTERPRETING VISUAL MONITORING RESULTS

Results of visual examinations will be used by Town personnel to identify issues of concern that require follow up action. Some common stormwater visual observations are provided below for and what action what be required:

Common Stormwater Visual Observations

Observation	Action
Oil sheen	Conduct an inspection of the area of the site draining to the sample collection point. Look for obvious sources of spilled oil, leaks, etc. If a source can be identified, stops should be taken to immediately clean up or remove the source.
Floating solids	Examine the solids to see if they are raw materials, waste materials, or other known products stored or used within the drainage area. Review the draining area to find potential sources and eliminate them.
Unusual color or odor	Attempt to compare the color or odor to the colors or odors of known chemicals and other materials used within the area. If possible, find the source and remove it.
Large amount of settled solids	Check unpaved unstabilized areas or areas of erosion.
Excess foam, suds or surface scum	If accompanied by a strong organic or sewage-like odor may indicate a sanitary sewer leak or connection. If the suds have a fragrant odor, they may indicate the presence of laundry water or similar wash waters and/or surfactants. If possible, find the source and remove it.
Cloudy sample – very slow to settle out	Evaluate the site draining to the discharge point for fine particulate material, such as dust, ash, or other pulverized, ground, or powdered chemicals. If possible, find the source and remove or reduce its potential to be collected in stormwater runoff.
Clean and clear sample of storm water discharge	This may indicate a high quality result. However, the visual examination will not provide information about dissolved contamination.

Town personnel will perform a brief investigation to determine a potential source if an issue of concern is identified in the initial visual screening. Otherwise, steps identified in Section 3.6, Follow-Up Screening will be followed to identify a potential source.

3.6. FOLLOW-UP SCREENING

The Town will perform follow-up screening within 72-hours of the initial visual monitoring that identified an issue of concern. The follow-up screening will consist of the following:

- Inspect the sampling location for visual signs of an illicit discharge

- Review the upstream draining area for potential sources
- Eliminate the source if identified

The Town will work with Code Enforcement in the event a source is identified and can't be immediately eliminated.

4.0 UNPERMITTED DISCHARGES TO MS4

The Town will develop, implement and enforce a program to identify facilities and activities that discharge to the MS4 without an AZPDES permit (industrial or construction).

Components of this program will include:

- Review of facilities/activities with potential activities to discharge
- Determine if facilities have AZPDES permit coverage or may require coverage
- Initiate contact with those facilities

The Town will provide an update in the annual report concerning the progress of this program.

5.0 REPORTING

The Town will submit all visual monitoring results on a discharge monitoring report (DMR) in a manner prescribed by ADEQ (electronic, paper format, etc.). A blank DMR form is provided in Attachment C until otherwise prescribed by the ADEQ. The DMR will be submitted no later than September 30 of each year and shall include visual monitoring results for the period July 1 through June 30 of the preceding calendar year.

6.0 IDDE PROGRAM TRACKING

The Town will track the success of its IDDE program. Indicators of success will include number of inspections, number of traced illicit discharges, response time to inspection, public awareness, time from discovery to elimination, number of outfalls inspected per year and other factors as deemed appropriate. The Town will evaluate and report the effectiveness of its IDDE program in the annual report.

7.0 TRAINING

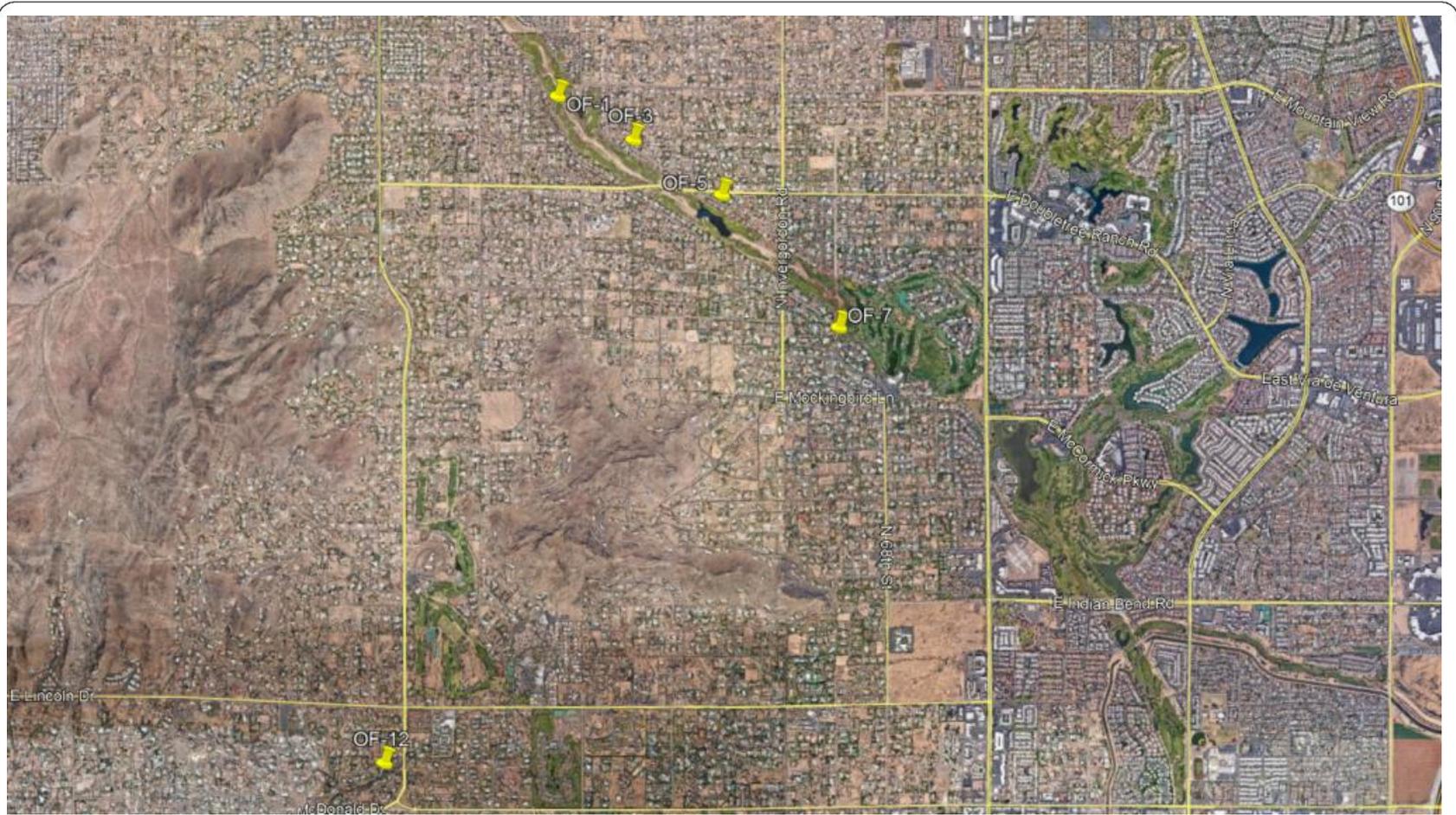
The Town will provide annual training to employees involved in the IDDE program. This annual training will include the IDDE program components, and how to recognize illicit discharges. The frequency and type of employee training will be included in the annual report.

Attachment A
Visual Monitoring Report Form

VISUAL MONITORING REPORT FORM Town of Paradise Valley

Type of Weather for Monitoring: <input type="checkbox"/> Wet Weather <input type="checkbox"/> Dry Weather			
MONITORING LOCATION:		DATE:	TIME:
INSPECTOR:			
RAINFALL EVENT INFORMATION			
TYPE: <input type="checkbox"/> RAINFALL <input type="checkbox"/> SNOWMELT <input type="checkbox"/> N/A (Dry)		TIME SINCE LAST QUALIFYING EVENT: (in days)	
TIME BEGAN:	DURATION: (in hours)	AMOUNT: (in inches)	
PHYSICAL OBSERVATIONS			
1. COLOR: <input type="checkbox"/> NONE <input type="checkbox"/> YELLOW <input type="checkbox"/> BROWN <input type="checkbox"/> TAN <input type="checkbox"/> GREEN <input type="checkbox"/> GRAY <input type="checkbox"/> RED			OTHER: _____
COLOR INTENSITY: <input type="checkbox"/> INTENSE <input type="checkbox"/> MODERATE <input type="checkbox"/> FAINT			
COMMENT:			
2. ODOR <input type="checkbox"/> NONE <input type="checkbox"/> DIESEL <input type="checkbox"/> GASOLINE <input type="checkbox"/> SOLVENT <input type="checkbox"/> CHLORINE			
<input type="checkbox"/> SEWAGE <input type="checkbox"/> ROTTEN EGG <input type="checkbox"/> MUSTY/EARTHY <input type="checkbox"/> OTHER _____			
COMMENT:			
3. CLARITY <input type="checkbox"/> OPAQUE <input type="checkbox"/> CLOUDY <input type="checkbox"/> TRANSPARENT			
COMMENT:			
4. FLOATING SOLIDS? <input type="checkbox"/> NONE <input type="checkbox"/> YES			
IF YES, DESCRIBE:			
5. SETTLED SOLIDS AFTER 24 HOURS? <input type="checkbox"/> NONE <input type="checkbox"/> YES			
IF YES, DESCRIBE:			
6. SUSPENDED SOLIDS? <input type="checkbox"/> NONE <input type="checkbox"/> YES			
IF YES, DESCRIBE:			
7. FOAM? <input type="checkbox"/> NONE <input type="checkbox"/> YES			
8. OILY SHEEN? <input type="checkbox"/> NONE <input type="checkbox"/> YES			
9. OTHER INDICATORS OF POSSIBLE STORM WATER POLLUTION? <input type="checkbox"/> NONE			
COMMENT:			
POSSIBLE SOURCES OF OBSERVED POLLUTION INDICATORS			
DESCRIPTION:			
<p>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 the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>			
Signed Name _____		Date _____	

Attachment B
Visual Monitoring Locations



 - Outfall Location

EEC Engineering and Environmental Consultants, Inc.
 7740 N. 16th St., Suite 135 | Phoenix, AZ 85020
 Tel: 602.248.7702 | Fax: 602.248.7851

Attachment B

**Visual Monitoring Locations
 Paradise Valley MS4**

DES: DR: CK: SHT 1 OF 1

Attachment C
Discharge Monitoring Report Form

Discharge Monitoring Report Form

I. Project/Site Name/Sample ID _____

Monitoring Period ___/___/___ to ___/___/___

II. Contact Information		V. Pollutants Monitored											
		A. Visual Monitoring:						B. Analytical Monitoring:					
		Sheen	Color	Foam	Solids	Odor _____ (specify)	Other _____ (specify)	Other _____ (specify)	TSS (Units)	Turbidity (Units)	pH	Other _____ (specify)	Other _____ (specify)
III. Discharge Date	IV. Sample Date												

VI. ATTACHMENTS Y N IF "YES," LIST: _____

VII. CERTIFICATION:
"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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, I believe the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name: _____ Title: _____ Phone: _____

Signature: _____ Date: _____