

# Harris County Pollution Control Services Department

**Illicit Discharge Detection and Elimination**

**by Elaine Savage**



# Pollution Control Services

- Civil investigators
- Enforce state and local environmental regulations:
  - Texas Water Code
  - Texas Administrative Code
  - Texas Health and Safety Code
  - Harris County Regulations for Storm Water Quality Management

# Pollution Control Services

Our investigators are authorized and empowered by law to enter any public or private property in order to make inspections and investigate surface and groundwater quality, industrial and municipal solid waste management and air pollution by Section 26.173 of the Texas Water Code and by Sections 361.032 and 382.111 of the Texas Health and Safety Code.

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Texas Penal Code 38.15(a) makes it a criminal offense to disrupt, impede, or otherwise interfere with investigators and officers while they are attempting to conduct an investigation.



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## What is an illicit discharge?

Non-storm water discharge to the Municipal Separate Storm Sewer System (MS4) except:

- Discharges regulated by an NPDES or TPDES permit;
- Discharges for which an NPDES or TPDES permit application has been submitted; and,
- Allowable non-storm water discharges that are not prohibited by the MS4 permittee.



Mobile Grooming Van



Carpet cleaning water



Non allowable discharge...





First step in proper disposal

Only in Texas!

Car Wash

50 BILL  
CHANGER



5077



Support your neighborhood carwash

# Pollution Control Services

Investigating illicit discharges:

- Investigate in response to complaints
- Discovery of illicit discharges during our routine sampling of wastewater treatment plants (domestic and industrial)
- Conduct investigations resulting from programs mandated by our MS4 permit:
  - Dry weather screening
  - Wet weather screening

# Pollution Control Services

- Conduct industrial storm water inspections in unincorporated Harris County (Note: Harris County Public Infrastructure investigators conduct storm water inspections at construction sites)
- Investigate suspicious discharges we observe while in the field





Really?





Wastewater from hydroblasting the inside of pipes discharging to unnamed creek and into a local bayou.





Discharge from sump at a construction vehicle washing area.





This is the result of the discharge (from the previous photo) into a flood control ditch.





Utility company discharge of sewage to ditch.





Discharge of oily residue from auto salvage yard.





Oil and water mixture in storm ditch.





Odor complaint investigation resulting in observation of illegal industrial discharge.





Downstream from facility flowing untreated to recreational waters.





Origination of discharge.





Discharge of sewage and cleaning chemicals from commercial establishment septic system.





Putrescibles leaking from trash compactor.



Straight to the bayou.





Slaughterhouse runoff to storm ditch.







Thirsty yet?



# Pollution Control Services

## Types of Water Quality Permits:

- Multi-Sector General Permit (MSGP) for **storm water** discharges associated with industrial activity.
- Water quality general permits (specific to certain industries, activities and to small and large MS4s) for **wastewater and/or storm water**
- Water quality individual permits (domestic and industrial) for **wastewater and/or storm water**

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## Regulations Commonly Cited:

- Texas Water Code: Chapter 26.121
- Municipal solid waste regulations: 30 TAC 330.15
- Industrial solid waste regulations: 30 TAC 335.4

# Pollution Control Services

## Compliance and Enforcement:

- An enforcement review is conducted on every violation notice.
- PCS may request a meeting with a subject to discuss the violation(s).
- When violations are severe and/or repeated, the case may be forwarded to the Harris County Attorney or the District Attorney.

# Pollution Control Services

- We notify the subject by certified mail that we are forwarding the case.
- It can take several years to go through the legal process
- We provide assistance as requested by the CA or DA during the litigation process.
- We often have to testify in cases we bring.
- When warranted, a Temporary Restraining Order (TRO) may be requested to order the responsible party to cease discharging.
- A TRO can be requested the same day the offense is occurring.
- If granted by the court, a TRO is valid for 14 days.





Storm drain clogged with lawn clippings and litter.





Out of sight...





Leaves and debris causing street flooding.







Uncapped cleanout.





Sewage discharge flowing untreated to recreational waters.





Another open cleanout.





Those weren't Baby Ruths.

# Contacts and References

- Pollution Control Services, Main Number: 713-920-2831
- Elaine Savage, Direct No. (713) 274-6318
- Texas Commission on Environmental Quality (TCEQ), Main No. (713) 767-3500

- PCS address:

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Pasadena, TX 77506

- [www.cleanwaterways.org](http://www.cleanwaterways.org)
- [www.tceq.texas.gov](http://www.tceq.texas.gov)
- [www.harriscountytexas.gov](http://www.harriscountytexas.gov)
- [www.pcs.harriscountytexas.gov](http://www.pcs.harriscountytexas.gov)

