

July 30, 2014

Illicit Discharge Detection and Elimination (IDDE)

IDDE Facts from Survey

Out of 9 Towns surveyed (Canton, Dedham, Foxborough, Medfield, Milton, Norwood, Sharon, Stoughton, Westwood)

- 1 Town had a formal written IDDE Investigation Plan
- Most Towns had an informal program of investigating illicit discharges
- All Towns surveyed had some form of mapping of their storm drainage system:
 - 1 Town has a CAD map of outfalls
 - 8 Towns have GIS maps
 - 4 Towns have known data gaps, including outfalls, pipes, or manholes
 - 1 Town has catchments to storm drain outfalls mapped
- Towns expressed most concern over meeting the following element of the new MS4 permit:
 - Outfall screening and sampling, especially during wet weather
- Still have not heard from **Randolph** or **Walpole**
- Still need GIS data from **Canton, Medfield, Norwood, Randolph, Walpole**

Summary of Major Changes between 2003 and 2013 Draft MS4 Permit (NH):

(adapted from EPA table)

Objective of the program: systematically find and eliminate sources of non-stormwater discharges to the MS4

- Inventory all known SSOs in the previous **5 years**. When aware of new SSO, oral notice to EPA in **24 hours** and written notes in **5 days**.
- System mapping- complete within **2 years** of permit effective date and updated as necessary. Requires mapping of: outfalls and receiving waters; pipes; open channel conveyances; catch basins; manholes; **interconnections with other MS4s**; municipally-owned stormwater treatment structures; **catchment delineations**; and waterbodies identified by name and indication of impairments. Where available, municipal sewer system and combined sewer system should also be mapped.
- Outfall Inventory including: unique identifier, receiving water, and other information to be completed no later than **1 year** from the effective date of the permit and be included in each annual report beginning **year 2**.
- Detailed, written IDDE program due within **1 year** of permit effective date. Written program to include:
 - Establish written statement that identifies responsibility to eliminate illicit discharge.
 - Assessment and Priority Ranking of Catchments- an assessment of the system and rank the illicit discharge potential of each catchment.
 - Outfall and Interconnections Screenings and Sampling-requires a written screening procedure and includes sample collection during dry weather and during wet weather (if catchment contains System Vulnerability Factor Part 2.3.4.8.e.i.) with flow samples analyzed for **ammonia, chlorine, conductivity, salinity, E. coli or enterococcus, surfactants, temperature and any other pollutant of concern**. Document all monitoring results each year in annual

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report including the date, outfall or interconnection identifier, location, weather conditions at time of sampling, precipitation in previous 48 hours, field screening parameter results, and results of all analyses.

- Catchment Investigation Procedure- written systematic procedure. Manhole inspection methodology, wet and dry weather investigation, and isolation and source verification procedures. Catchment investigation milestones: **80%** of all Problem Catchments within **3 years** of the effective date of the permit. **100%** of all Problem Catchments and **40%** of all catchments **5 years** from the effective date of the permit and **100%** of all catchments **10 years** from the effective date of the permit.
 - Removal and Confirmation- record the location, description, method of discovery, date of discovery, date of elimination, mitigation or enforcement action; and estimate of the volume of flow removed. Confirmatory screening within **1 year** of removal in wet (if catchment contains System Vulnerability Factor) and dry weather. Follow up Screening in dry and wet (if required) in **5 years**.
 - Illicit Discharge Prevention Procedures—develop and implement prevention mechanisms and procedures.
- Provide **annual** training to employees involved in IDDE program