

Illicit Discharge Detection and Elimination (IDDE) Plan

June 30, 2019

Town of Rowley, Massachusetts

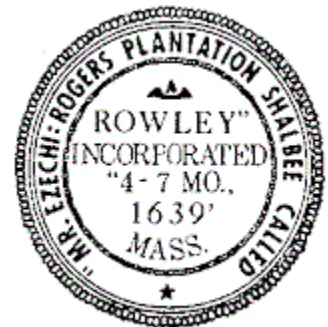


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Appendix B – Storm System Mapping
Appendix C – Field Forms, Sample Bottle Labels, and Chain of Custody Forms
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Appendix E – IDDE Employee Training Record
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1 Introduction

1.1 MS4 Program

This Illicit Discharge Detection and Elimination (IDDE) Plan has been developed by the Town of Rowley to address the requirements of the United States Environmental Protection Agency's (USEPA's) 2016 National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) in Massachusetts, hereafter referred to as the "2016 Massachusetts MS4 Permit" or "MS4 Permit."

The 2016 Massachusetts MS4 Permit requires that each permittee, or regulated community, address six Minimum Control Measures. These measures include the following:

1. Public Education and Outreach
2. Public Involvement and Participation
3. Illicit Discharge Detection and Elimination Program
4. Construction Site Stormwater Runoff Control
5. Stormwater Management in New Development and Redevelopment (Post Construction Stormwater Management); and
6. Good Housekeeping and Pollution Prevention for Permittee Owned Operations.

Under Minimum Control Measure 3, the permittee is required to implement an IDDE program to systematically find and eliminate sources of non-stormwater discharges to its municipal separate storm sewer system and implement procedures to prevent such discharges. The IDDE program must also be recorded in a written (hardcopy or electronic) document. This IDDE Plan has been prepared to address this requirement.

1.2 Illicit Discharges

An "illicit discharge" is any discharge to a drainage system that is not composed entirely of stormwater, with the exception of discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire-fighting activities.

Illicit discharges may take a variety of forms. Illicit discharges may enter the drainage system through direct or indirect connections. Direct connections may be relatively obvious, such as cross-connections of sewer services to the storm drain system. Indirect illicit discharges may be more difficult to detect or address, such as failing septic systems that discharge untreated sewage to a ditch within the MS4, or a sump pump that discharges contaminated water on an intermittent basis.

Some illicit discharges are intentional, such as dumping used oil (or other pollutant) into catch basins, a resident or contractor illegally tapping a new sewer lateral into a storm drain pipe to avoid the costs of a sewer connection fee and service, and illegal dumping of yard wastes into surface waters.

Some illicit discharges are related to the unsuitability of original infrastructure to the modern regulatory environment. Examples of illicit discharges in this category include connected floor drains in old buildings, as well as sanitary sewer overflows that enter the drainage system. Sump pumps legally

connected to the storm drain system may be used inappropriately, such as for the disposal of floor washwater or old household products, in many cases due to a lack of understanding on the part of the homeowner.

Elimination of some discharges may require substantial costs and efforts, such as funding and designing a project to reconnect sanitary sewer laterals. Others, such as improving self-policing of dog waste management, can be accomplished by outreach in conjunction with the minimal additional cost of dog waste bins and the municipal commitment to disposal of collected materials on a regular basis.

Regardless of the intention, when not addressed, illicit discharges can contribute high levels of pollutants, such as heavy metals, toxics, oil, grease, solvents, nutrients, and pathogens to surface waters.

1.3 Allowable Non-Stormwater Discharges

The following categories of non-storm water discharges are allowed under the MS4 Permit unless the permittee, USEPA or Massachusetts Department of Environmental Protection (MassDEP) identifies any category or individual discharge of non-stormwater discharge as a significant contributor of pollutants to the MS4:

- Water line flushing
- Landscape irrigation
- Diverted stream flows
- Rising ground water
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20))
- Uncontaminated pumped groundwater
- Discharge from potable water sources
- Foundation drains
- Air conditioning condensation
- Irrigation water, springs
- Water from crawl space pumps
- Footing drains
- Lawn watering
- Individual resident car washing
- De-chlorinated swimming pool discharges
- Street wash waters
- Residential building wash waters without detergents

If these discharges are identified as significant contributors to the MS4, they must be considered an “illicit discharge” and addressed in the IDDE Plan (i.e., control these sources so they are no longer significant contributors of pollutants, and/or eliminate them entirely).

1.4 Receiving Waters and Impairments

Table 1-1 lists the “impaired waters” within the boundaries of Rowley’s regulated area based on the Final 2014 Massachusetts Integrated List of Waters produced by MassDEP every two years. Impaired waters are water bodies that do not meet water quality standards for one or more designated use(s) such as recreation or aquatic habitat.

**Table 1-1. Impaired Waters
Rowley, Massachusetts**

Water Body Name	Segment ID	Category	Impairment(s)	Associated Approved TMDL
Mill River	MA91-09; MA91-08	5	Fecal Coliform, Excess Algae Growth, Aquatic Plants, Aquatic Macroinvertebrate Bioassessment	na
Rowley River	MA91-05	5	Fecal Coliform	na
Plum Island Sound	MA91-12	5	Fecal Coliform	na
Egypt River	MA91-14	5	Fecal Coliform	na

Category 4a Waters – impaired water bodies with a completed Total Maximum Daily Load (TMDL).

Category 4c Waters – impaired water bodies where the impairment is not caused by a pollutant. No TMDL required.

Category 5 Waters – impaired water bodies that require a TMDL.

“Approved TMDLs” are those that have been approved by EPA as of the date of issuance of the 2016 MS4 Permit.

1.5 IDDE Program Goals, Framework, and Timeline

The goals of the IDDE program are to find and eliminate illicit discharges to municipal separate storm sewer system and to prevent illicit discharges from happening in the future. The program consists of the following major components as outlined in the MS4 Permit:

- Legal authority and regulatory mechanism to prohibit illicit discharges and enforce this prohibition
- Storm system mapping
- Inventory and ranking of outfalls
- Dry weather outfall screening
- Catchment investigations
- Identification/confirmation of illicit sources
- Illicit discharge removal
- Followup screening
- Employee training.

The IDDE investigation procedure framework is shown in **Figure 1-1**. The required timeline for implementing the IDDE program is shown in **Table 1-2**.

Figure 1-1. IDDE Investigation Procedure Framework

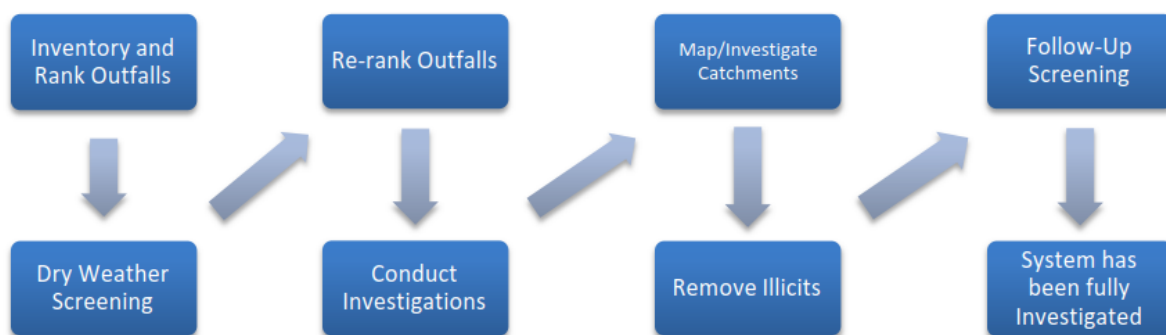


Table 1-2. IDDE Program Implementation Timeline

IDDE Program Requirement	Completion Date from Effective Date of Permit					
	1 Year	1.5 Years	2 Years	3 Years	7 Years	10 Years
Written IDDE Program Plan	X					
SSO Inventory	X					
Written Catchment Investigation Procedure		X				
Phase I Mapping			X			
Phase II Mapping						X
IDDE Regulatory Mechanism or By-law (if not already in place)				X		
Dry Weather Outfall Screening				X		
Follow-up Ranking of Outfalls and Interconnections				X		
Catchment Investigations – Problem Outfalls					X	
Catchment Investigations – all Problem, High and Low Priority Outfalls						X

1.6 Work Completed to Date

The 2003 MS4 Permit required each MS4 community to develop a plan to detect illicit discharges using a combination of storm system mapping, adopting a regulatory mechanism to prohibit illicit discharges and enforce this prohibition, and identifying tools and methods to investigate suspected illicit discharges. Each MS4 community was also required to define how confirmed discharges would be eliminated and how the removal would be documented.

Rowley has completed the following IDDE program activities consistent with the 2003 MS4 Permit requirements:

- Developed a map of outfalls and receiving waters
- Adopted an IDDE bylaw or regulatory mechanism
- Understanding of how to locate illicit discharges (i.e., visual screening of outfalls for dry weather discharges, dye or smoke testing)

In addition to the 2003 MS4 Permit requirements, other IDDE-related activities that have been completed include:

- Additional storm system mapping, including the locations of catch basins, manholes and pipe connectivity

2 Authority and Statement of IDDE Responsibilities

2.1 Legal Authority

Rowley has adopted regulations prohibiting illicit connections in 2008. A copy of the regulation is provided in **Appendix A**. The Regulation provides Rowley with adequate legal authority to:

- Prevent pollutants from entering the MS4
- Prohibit illicit connections and unauthorized discharges to the MS4
- Investigate suspected illicit discharges
- Comply with state and federal statutes and regulations relating to stormwater discharges
- Establish the legal authority to ensure compliance with proper inspection, monitoring and enforcement
- Prevent contamination of drinking water supplies

Rowley will review its current regulation and related land use regulations and policies for consistency with the 2016 MS4 Permit.

2.2 Statement of Responsibilities

Rowley's departments responsible for implementing the IDDE program pursuant to the provisions of this plan of the include:

- Highway Department
- Building Inspector
- Licensed Plumbing Inspector
- Health Department
- Conservation Agent
- Conservation Commission
- Planning Board Chairperson
- Board of Selectmen
- Town Administrator

3 Stormwater System Mapping

Rowley, with assistance from the Merrimack Valley Planning Commission (MVPC), originally developed mapping of its stormwater system to meet the mapping requirements of the 2003 MS4 Permit. A copy of the existing storm system map is provided in **Appendix B**. The 2016 MS4 Permit requires a more detailed storm system map than was required by the 2003 MS4 Permit. The revised mapping is intended to facilitate the identification of key infrastructure, factors influencing proper system operation, and the potential for illicit discharges.

The 2016 MS4 Permit requires the storm system map to be updated in two phases as outlined below. The Highway Department, with assistance from MVPC, is responsible for updating the stormwater system mapping pursuant to the 2016 MS4 Permit. Rowley will report on the progress towards completion of the storm system map in each annual report. Updates to the stormwater mapping will be included in **Appendix B**.

3.1 Phase I Mapping

Phase I mapping must be completed within two (2) years of the effective date of the permit (June 30, 2020) and include the following information:

- Outfalls and receiving waters (previously required by the MS4-2003 permit)
- Open channel conveyances (swales, ditches, etc.)
- Interconnections with other MS4s and other storm sewer systems
- Municipally owned stormwater treatment structures
- Water bodies identified by name and indication of all use impairments as identified on the most recent EPA approved Massachusetts Integrated List of Waters report
- Initial catchment delineations. Topographic contours and drainage system information may be used to produce initial catchment delineations.

Rowley has completed the following updates to its stormwater mapping to meet the Phase I requirements:

- Outfalls and receiving waters
- Initial catchment delineations

3.2 Phase II Mapping

Phase II mapping must be completed within ten (10) years of the effective date of the permit (June 30, 2028) and include the following information:

- Outfall spatial location (latitude and longitude with a minimum accuracy of +/-30 feet)
- Pipes
- Manholes
- Catch basins

- Refined catchment delineations. Catchment delineations must be updated to reflect information collected during catchment investigations.
- Municipal Sanitary Sewer system (if available)
- Municipal combined sewer system (if applicable).

Rowley has completed the following updates to its stormwater mapping to meet the Phase II requirements:

- Outfall spatial location
- Pipes

3.3 Additional Recommended Mapping Elements

Although not a requirement of the 2016 MS4 Permit, Rowley will make efforts to include the following recommended elements in its storm system mapping:

- Storm sewer material, size (pipe diameter), age
- Privately owned stormwater treatment structures
- Area where the permittee's MS4 has received or could receive flow from septic system discharges
- Seasonal high water table elevations impacting sanitary alignments
- Topography
- Orthophotography
- Alignments, dates and representation of work completed of past illicit discharge investigations
- Locations of suspected confirmed and corrected illicit discharges with dates and flow estimates.

4 Sanitary Sewer Overflows (SSOs)

The 2016 MS4 Permit requires municipalities to prohibit illicit discharges, including sanitary sewer overflows (SSOs), to the separate storm sewer system. SSOs are discharges of untreated sanitary wastewater from a municipal sanitary sewer that can contaminate surface waters, cause serious water quality problems and property damage, and threaten public health. SSOs can be caused by blockages, line breaks, sewer defects that allow stormwater and groundwater to overload the system, power failures, improper sewer design, and vandalism.

Rowley discharges sanitary sewer waste to on-site disposal systems (septic systems) for all properties within the Town and regulated area. Therefore, Rowley has had no SSOs within the five (5) years prior to the effective date of the 2016 MS4 Permit, as noted in **Table 4-1**.

If this condition changes, Rowley will monitor, report and eliminate an SSO should one occur. Upon becoming aware of an SSO to the MS4, Rowley will provide oral notice to EPA within 24 hours and written notice to EPA and MassDEP within five (5) days of becoming aware of the SSO occurrence.

The inventory in **Table 4-1** will be updated by the Town when or if sanitary sewers are detected. The SSO inventory will be included in the annual report, including the status of mitigation and corrective measures to address each identified SSO.

Table 4-1. SSO Inventory

Rowley, Massachusetts

Revision Date: June 30, 2019

SSO Location ¹	Discharge Statement ²	Date ³	Time Start ³	Time End ³	Estimated Volume ⁴	Description ⁵	Mitigation Completed ⁶	Mitigation Planned ⁷

¹ Location (approximate street crossing/address and receiving water, if any)

² A clear statement of whether the discharge entered a surface water directly or entered the MS4

³ Date(s) and time(s) of each known SSO occurrence (i.e., beginning and end of any known discharge)

⁴ Estimated volume(s) of the occurrence

⁵ Description of the occurrence indicating known or suspected cause(s)

⁶ Mitigation and corrective measures completed with dates implemented

⁷ Mitigation and corrective measures planned with implementation schedules

5 Assessment and Priority Ranking of Outfalls

The 2016 MS4 Permit requires an assessment and priority ranking of outfalls in terms of their potential to have illicit discharges and SSOs and the related public health significance. The ranking helps determine the priority order for performing IDDE investigations and meeting permit milestones.

5.1 Outfall Catchment Delineations

A catchment is the area that drains to an individual outfall¹ or interconnection.² The catchments for each of the MS4 outfalls will be delineated to define contributing areas for investigation of potential sources of illicit discharges. Catchments are typically delineated based on topographic contours and mapped drainage infrastructure, where available. As described in **Section 3**, initial catchment delineations will be completed as part of the Phase I mapping, and refined catchment delineations will be completed as part of the Phase II mapping to reflect information collected during catchment investigations

5.2 Outfall and Interconnection Inventory and Initial Ranking

Rowley will complete an initial outfall and interconnection inventory and priority ranking to assess illicit discharge potential based on existing information. The initial inventory and ranking will be completed within one (1) year from the effective date of the permit. An updated inventory and ranking will be provided in each annual report thereafter. The inventory will be updated annually to include data collected in connection with dry weather screening and other relevant inspections.

The outfall and interconnection inventory will identify each outfall and interconnection discharging from the MS4, record its location and condition, and provide a framework for tracking inspections, screenings and other IDDE program activities.

Outfalls and interconnections will be classified into one of the following categories:

1. **Problem Outfalls:** Outfalls/interconnections with known or suspected contributions of illicit discharges based on existing information shall be designated as Problem Outfalls. This shall include any outfalls/interconnections where previous screening indicates likely sewer input. Likely sewer input indicators are any of the following:

- Olfactory or visual evidence of sewage,

¹ **Outfall** means a point source as defined by 40 CFR § 122.2 as the point where the municipal separate storm sewer discharges to waters of the United States. An outfall does not include open conveyances connecting two municipal separate storm sewers or pipes, tunnels or other conveyances that connect segments of the same stream or other waters of the United States and that are used to convey waters of the United States. Culverts longer than a simple road crossing shall be included in the inventory unless the permittee can confirm that they are free of any connections and simply convey waters of the United States.

² **Interconnection** means the point (excluding sheet flow over impervious surfaces) where the permittee's MS4 discharges to another MS4 or other storm sewer system, through which the discharge is conveyed to waters of the United States or to another storm sewer system and eventually to a water of the United States.

- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and bacteria levels greater than the water quality criteria applicable to the receiving water, or
- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and detectable levels of chlorine.

Dry weather screening and sampling, as described in **Section 6** of this IDDE Plan and Part 2.3.4.7.b of the MS4 Permit, is not required for Problem Outfalls.

2. High Priority Outfalls: Outfalls/interconnections that have not been classified as Problem Outfalls and that are:

- Discharging to an area of concern to public health due to proximity of public beaches, recreational areas, drinking water supplies or shellfish beds
- Determined by the permittee as high priority based on the characteristics listed below or other available information.

3. Low Priority Outfalls: Outfalls/interconnections determined by the permittee as low priority based on the characteristics listed below or other available information.

4. Excluded outfalls: Outfalls/interconnections with no potential for illicit discharges may be excluded from the IDDE program. This category is limited to roadway drainage in undeveloped areas with no dwellings and no sanitary sewers; drainage for athletic fields, parks or undeveloped green space and associated parking without services; cross-country drainage alignments (that neither cross nor are in proximity to sanitary sewer alignments) through undeveloped land.

Outfalls will be ranked into the above priority categories (except for excluded outfalls, which may be excluded from the IDDE program) based on the following characteristics of the defined initial catchment areas, where information is available. Additional relevant characteristics, including location-specific characteristics, may be considered but must be documented in this IDDE Plan.

- **Previous screening results** – previous screening/sampling results indicate likely sewer input (see criteria above for Problem Outfalls).
- **Past discharge complaints and reports.**
- **Poor receiving water quality** – the following guidelines are recommended to identify waters as having a high illicit discharge potential:
 - Exceeding water quality standards for bacteria
 - Ammonia levels above 0.5 mg/l
 - Surfactants levels greater than or equal to 0.25 mg/l
- **Density of generating sites** – Generating sites are those places, including institutional, municipal, commercial, or industrial sites, with a potential to generate pollutants that could contribute to illicit discharges. Examples of these sites include, but are not limited to, car dealers; car washes; gas stations; garden centers; and industrial manufacturing areas.

- **Age of development and infrastructure** – Industrial areas greater than 40 years old and areas where the sanitary sewer system is more than 40 years old will probably have a high illicit discharge potential. Developments 20 years or younger will probably have a low illicit discharge potential.
- **Surrounding density of aging septic systems** – Septic systems thirty years or older in residential land use areas are prone to have failures and may have a high illicit discharge potential.
- **Culverted streams** – Any river or stream that is culverted for distances greater than a simple roadway crossing may have a high illicit discharge potential.
- **Water quality limited waterbodies** that receive a discharge from the MS4 or waters with approved TMDLs applicable to the permittee, where illicit discharges have the potential to contain the pollutant identified as the cause of the water quality impairment.

Table 5-1 provides a Rowley’s initial outfall inventory and priority ranking matrix.

Table 5 1. Outfall Inventory and Priority Ranking Matrix

Rowley, Massachusetts

Revision Date: June 28, 2019

Outfall ID	Receiving Water	Previous Screening Results Indicate Likely Sewer Input? ¹	Discharging to Area of Concern to Drinking Water Supply (Zone II)	Frequency of Past Discharge Complaints	Receiving Water Quality ³	Density of Generating Sites ⁴	Age of Development/ Infrastructure ⁵	Historic Combined Sewers or Septic? ⁶	Aging Septic? ⁷	Culverted Streams? ⁸	Additional Characteristics	Score	Priority Ranking
Information Source		Outfall inspections and sample results	GIS Maps	Town Staff	Impaired Waters List	Land Use/GIS Maps, Aerial Photography	Land Use Information, Visual Observation	Town Staff, GIS Maps	Land Use, Town Staff	GIS and Storm System Maps	Other		
Scoring Criteria		Yes = 3 (Problem Outfall)	Yes = 3	Frequent = 3	Poor = 3	High = 3	High = 3	Yes = 3	Yes = 3	Yes = 3	TBD		
		No = 0	No = 0	Occasional = 2	Fair = 2	Medium = 2	Medium = 2	No = 0	No = 0	No = 0			
				None = 0	Good = 0	Low = 1	Low = 1						
50	Parker River	0	0	0	3	1	1	0	3	0		8	High
51	Parker River	0	0	0	3	1	1	0	3	0		8	High
55	Mill River	0	0	0	3	1	1	0	3	0		8	High
58	Mill River	0	0	0	3	1	1	0	3	0		8	High
82	Mill River	0	3	0	3	1	1	0	0	0		8	High
106	Mill River	0	3	0	3	1	1	0	0	0		8	High
2512	Mill River	0	3	0	3	1	1	0	0	0		8	High
52	Mill River	0	0	0	3	1	1	0	0	0		5	High
53	Mill River	0	0	0	3	1	1	0	0	0		5	High
54	Mill River	0	0	0	3	1	1	0	0	0		5	High
56	Mill River	0	0	0	3	1	1	0	0	0		5	High
57	Mill River	0	0	0	3	1	1	0	0	0		5	High
59	Mill River	0	0	0	3	1	1	0	0	0		5	High
63	Mill River	0	0	0	3	1	1	0	0	0		5	High
64	Mill River	0	0	0	3	1	1	0	0	0		5	High
65	Mill River	0	0	0	3	1	1	0	0	0		5	High
66	Mill River	0	0	0	3	1	1	0	0	0		5	High
67	Mill River	0	0	0	3	1	1	0	0	0		5	High
68	Mill River	0	0	0	3	1	1	0	0	0		5	High
71	Mill River	0	0	0	3	1	1	0	0	0		5	High
83	Mill River	0	0	0	3	1	1	0	0	0		5	High
90	Hood Pond	0	3	0	0	1	1	0	0	0		5	Low
92	Mill River	0	0	0	3	1	1	0	0	0		5	High
93	Mill River	0	0	0	3	1	1	0	0	0		5	High
94	Mill River	0	0	0	3	1	1	0	0	0		5	High
104	Mill River	0	0	0	3	1	1	0	0	0		5	High
105	Mill River	0	0	0	0	1	1	0	3	0		5	Low
107	Mill River	0	0	0	3	1	1	0	0	0		5	High
2911	Mill River	0	0	0	3	1	1	0	0	0		5	High
2912	Mill River	0	0	0	3	1	1	0	0	0		5	High
45	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
47	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
60	Mill River	0	0	0	0	1	1	0	0	0		2	Low
61	Mill River	0	0	0	0	1	1	0	0	0		2	Low
62	Mill River	0	0	0	0	1	1	0	0	0		2	Low

Table 5 1. Outfall Inventory and Priority Ranking Matrix

Rowley, Massachusetts

Revision Date: June 28, 2019

Outfall ID	Receiving Water	Previous Screening Results Indicate Likely Sewer Input? ¹	Discharging to Area of Concern to Drinking Water Supply (Zone II)	Frequency of Past Discharge Complaints	Receiving Water Quality ³	Density of Generating Sites ⁴	Age of Development/ Infrastructure ⁵	Historic Combined Sewers or Septic? ⁶	Aging Septic? ⁷	Culverted Streams? ⁸	Additional Characteristics	Score	Priority Ranking
Information Source		Outfall inspections and sample results	GIS Maps	Town Staff	Impaired Waters List	Land Use/GIS Maps, Aerial Photography	Land Use Information, Visual Observation	Town Staff, GIS Maps	Land Use, Town Staff	GIS and Storm System Maps	Other		
Scoring Criteria		Yes = 3 (Problem Outfall)	Yes = 3	Frequent = 3	Poor = 3	High = 3	High = 3	Yes = 3	Yes = 3	Yes = 3	TBD		
		No = 0	No = 0	Occasional = 2	Fair = 2	Medium = 2	Medium = 2	No = 0	No = 0	No = 0			
				None = 0	Good = 0	Low = 1	Low = 1						
69	Mill River	0	0	0	0	1	1	0	0	0		2	Low
70	Mill River	0	0	0	0	1	1	0	0	0		2	Low
72	Mill River	0	0	0	0	1	1	0	0	0		2	Low
73	Mill River	0	0	0	0	1	1	0	0	0		2	Low
74	Mill River	0	0	0	0	1	1	0	0	0		2	Low
77	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
78	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
79	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
91	Muddy Brook	0	0	0	0	1	1	0	0	0		2	Low
95	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
96	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
97	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
98	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
99	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
100	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
101	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
102	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
111	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
511	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
512	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
911	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
1311	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
1711	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low
2111	Ox Brook Pasture	0	0	0	0	1	1	0	0	0		2	Low

Scoring Criteria:¹ Previous screening results indicate likely sewer input if any of the following are true:

- Olfactory or visual evidence of sewage,
- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and bacteria levels greater than the water quality criteria applicable to the receiving water, or
- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and detectable levels of chlorine

² Outfalls/interconnections that discharge to or in the vicinity of any of the following areas: public beaches, recreational areas, drinking water supplies, or shellfish beds³ Receiving water quality based on latest version of MassDEP Integrated List of Waters.

- Poor = Waters with approved TMDLs (Category 4a Waters) where illicit discharges have the potential to contain the pollutant identified as the cause of the impairment
- Fair = Water quality limited waterbodies that receive a discharge from the MS4 (Category 5 Waters)
- Good = No water quality impairments

⁴ Generating sites are institutional, municipal, commercial, or industrial sites with a potential to contribute to illicit discharges (e.g., car dealers, car washes, gas stations, garden centers, industrial manufacturing, etc.)

Table 5 1. Outfall Inventory and Priority Ranking Matrix
Rowley, Massachusetts
Revision Date: June 28, 2019

Outfall ID	Receiving Water	Previous Screening Results Indicate Likely Sewer Input? ¹	Discharging to Area of Concern to Drinking Water Supply (Zone II)	Frequency of Past Discharge Complaints	Receiving Water Quality ³	Density of Generating Sites ⁴	Age of Development/ Infrastructure ⁵	Historic Combined Sewers or Septic? ⁶	Aging Septic? ⁷	Culverted Streams? ⁸	Additional Characteristics	Score	Priority Ranking
Information Source		Outfall inspections and sample results	GIS Maps	Town Staff	Impaired Waters List	Land Use/GIS Maps, Aerial Photography	Land Use Information, Visual Observation	Town Staff, GIS Maps	Land Use, Town Staff	GIS and Storm System Maps	Other		
Scoring Criteria		Yes = 3 (Problem Outfall)	Yes = 3	Frequent = 3	Poor = 3	High = 3	High = 3	Yes = 3	Yes = 3	Yes = 3	TBD		
		No = 0	No = 0	Occasional = 2	Fair = 2	Medium = 2	Medium = 2	No = 0	No = 0	No = 0			
				None = 0	Good = 0	Low = 1	Low = 1						

⁵ Age of development and infrastructure:

- High = Industrial areas greater than 40 years old and areas where the sanitary sewer system is more than 40 years old
- Medium = Developments 20-40 years old
- Low = Developments less than 20 years old

⁶ Areas once served by combined sewers and but have been separated, or areas once served by septic systems but have been converted to sanitary sewers.

⁷ Aging septic systems are septic systems 30 years or older in residential areas.

⁸ Any river or stream that is culverted for distance greater than a simple roadway crossing.

6 Dry Weather Outfall Screening and Sampling

Dry weather flow is a common indicator of potential illicit connections. The MS4 Permit requires all outfalls/interconnections (excluding Problem and excluded Outfalls) to be inspected for the presence of dry weather flow. The Highway Department is responsible for conducting dry weather outfall screening, starting with High Priority outfalls, followed by Low Priority outfalls, based on the initial priority rankings described in the previous section.

6.1 Weather Conditions

Dry weather outfall screening and sampling may occur when no more than 0.1 inches of rainfall has occurred in the previous 24-hour period and no significant snow melt is occurring. For purposes of determining dry weather conditions, program staff will use precipitation data from the Clark School Station (<https://www.wunderground.com/weather/us/ma/rowley/01969>). If this weather station is not available or not reporting current weather data, then the Beverly Municipal Airport Station (<https://forecast.weather.gov/MapClick.php?lat=42.716010000000004&lon=-70.878719999999998#.XROviChYaUk>) will be used as a back-up.

6.2 Dry Weather Screening/Sampling Procedure

6.2.1 General Procedure

The Town of Rowley intends to complete dry weather screening and sampling using the general procedure for inspection and sampling protocol outlined below. The dry weather outfall inspection and sampling procedure consists of the following general steps:

1. Identify outfall(s) to be screened/sampled based on initial outfall inventory and priority ranking
2. Acquire the necessary staff, mapping, and field equipment (see **Table 6-1** for list of potential field equipment)
3. Conduct the outfall inspection during dry weather:
 - a. Mark and photograph the outfall
 - b. Record the inspection information and outfall characteristics (using paper forms or digital form using a tablet or similar device) (see form in **Appendix C**)
 - c. Look for and record visual/olfactory evidence of pollutants in flowing outfalls including odor, color, turbidity, and floatable matter (suds, bubbles, excrement, toilet paper or sanitary products). Also observe outfalls for deposits and stains, vegetation, and damage to outfall structures.
4. If flow is observed, sample and test the flow following the procedures described in the following sections.
5. If no flow is observed, but evidence of illicit flow exists (illicit discharges are often intermittent or transitory), revisit the outfall during dry weather within one week of the initial observation, if practicable, to perform a second dry weather screening and sample any observed flow. Other techniques can be used to detect intermittent or transitory flows including conducting inspections during evenings or weekends and using optical brighteners.

6. Input results from screening and sampling into spreadsheet/database. Include pertinent information in the outfall/interconnection inventory and priority ranking.
7. Include all screening data in the annual report.

Previous outfall screening/sampling conducted under the 2013 MS4 Permit may be used to satisfy the dry weather outfall/screening requirements of the 2016 MS4 Permit only if the previous screening and sampling was substantially equivalent to that required by the 2016 MS4 Permit, including the list of analytes outlined in Section 2.3.4.7.b.iii.4 of the 2016 permit.

Dry weather standard operating procedures can be found is provided in **Appendix C**.

6.2.2 Field Equipment

Table 6-1 lists field equipment commonly used for dry weather outfall screening and sampling.

Table 6-1. Field Equipment – Dry Weather Outfall Screening and Sampling

Equipment	Use/Notes
Clipboard	For organization of field sheets and writing surface
Field Sheets	Field sheets for both dry weather inspection and Dry weather sampling should be available with extras
Chain of Custody Forms	To ensure proper handling of all samples
Pens/Pencils/Permanent Markers	For proper labeling
Nitrile Gloves	To protect the sampler as well as the sample from contamination
Flashlight/headlamp w/batteries	For looking in outfalls or manholes, helpful in early mornings as well
Cooler with Ice	For transporting samples to the laboratory
Digital Camera	For documenting field conditions at time of inspection
Personal Protective Equipment (PPE)	Reflective vest, Safety glasses and boots at a minimum
GPS Receiver	For taking spatial location data
Water Quality Sonde	If needed, for sampling conductivity, temperature, pH
Water Quality Meter	Hand held meter, if available, for testing for various water quality parameters such as ammonia, surfactants and chlorine
Test Kits	Have extra kits on hand to sample more outfalls than are anticipated to be screened in a single day
Label Tape	For labeling sample containers
Sample Containers	Make sure all sample containers are clean. Keep extra sample containers on hand at all times. Make sure there are proper sample containers for what is being sampled for (i.e., bacteria requires sterile containers).
Pry Bar or Pick	For opening catch basins and manholes when necessary
Sandbags	For damming low flows in order to take samples
Small Mallet or Hammer	Helping to free stuck manhole and catch basin covers
Utility Knife	Multiple uses
Measuring Tape	Measuring distances and depth of flow

Equipment	Use/Notes
Safety Cones	Safety
Hand Sanitizer	Disinfectant/decontaminant
Zip Ties/Duct Tape	For making field repairs
Rubber Boots/Waders	For accessing shallow streams/areas
Sampling Pole/Dipper/Sampling Cage	For accessing hard to reach outfalls and manholes

6.2.3 Sample Collection and Analysis

If flow is present during a dry weather outfall inspection, a sample will be collected and analyzed for the required permit parameters³ listed in **Table 6-2**. The general procedure for collection of outfall samples is as follows:

1. Fill out all sample information on sample bottles and field sheets (see **Appendix C** for Sample Labels and Field Sheets)
2. Put on protective gloves (nitrile/latex/other) before sampling
3. Collect sample with dipper or directly in sample containers. If possible, collect water from the flow directly in the sample bottle. Be careful not to disturb sediments.
4. If using a dipper or other device, triple rinse the device with distilled water and then in water to be sampled (not for bacteria sampling)
5. Use test strips, test kits, and field meters (rinse similar to dipper) for most parameters (see **Table 6-2**)
6. Place laboratory samples on ice for analysis of bacteria and pollutants of concern
7. Fill out chain-of-custody form (**Appendix C**) for laboratory samples
8. Coordinate to have a courier from Alpha Analytical – Environmental Laboratory pick up samples
9. Dispose of used test strips and test kit ampules properly
10. Decontaminate all testing personnel and equipment

In the event that an outfall is submerged, either partially or completely, or inaccessible, field staff will proceed to the first accessible upstream manhole or structure for the observation and sampling and report the location with the screening results. Field staff will continue to the next upstream structure until there is no longer an influence from the receiving water on the visual inspection or sampling.

Field test kits or field instrumentation are permitted for all parameters except indicator bacteria and any pollutants of concern. Field kits need to have appropriate detection limits and ranges. **Table 6-2** lists various field test kits and field instruments that can be used for outfall sampling associated with the 2016 MS4 Permit parameters, other than indicator bacteria and any pollutants of concern. Analytic procedures and user's manuals for field test kits and field instrumentation are provided in **Appendix D**.

³ Other potentially useful parameters, although not required by the MS4 Permit, include **fluoride** (indicator of potable water sources in areas where water supplies are fluoridated), **potassium** (high levels may indicate the presence of sanitary wastewater), and **optical brighteners** (indicative of laundry detergents).

Table 6-2. Sampling Parameters and Analysis Methods

Analyte or Parameter	Suggested Instrumentation (Portable Meter)	Field Test Kit
Ammonia	CHEMetrics™ V-2000 Colorimeter Hach™ DR/890 Colorimeter Hach™ Pocket Colorimeter™ II	CHEMetrics™ K-1410 CHEMetrics™ K-1510 (series) Hach™ NI-SA Hach™ Ammonia Test Strips
Surfactants (Detergents)	CHEMetrics™ I-2017	CHEMetrics™ K-9400 and K-9404 Hach™ DE-2
Chlorine	CHEMetrics™ V-2000, K-2513 Hach™ Pocket Colorimeter™ II	NA
Conductivity	CHEMetrics™ I-1200 YSI Pro30 YSI EC300A Oakton 450	NA
Temperature	YSI Pro30 YSI EC300A Oakton 450	NA
Salinity	YSI Pro30 YSI EC300A Oakton 450	NA
Temperature	YSI Pro30 YSI EC300A Oakton 450	NA
Indicator Bacteria: <i>E. coli</i> (freshwater) or Enterococcus (saline water)	EPA certified laboratory procedure (40 CFR § 136)	NA
Pollutants of Concern ¹	EPA certified laboratory procedure (40 CFR § 136)	NA

¹ Where the discharge is directly into a water quality limited water or a water subject to an approved TMDL, the sample must be analyzed for the pollutant(s) of concern identified as the cause of the water quality impairment.

Testing for indicator bacteria and any pollutants of concern must be conducted using analytical methods and procedures found in 40 CFR § 136.⁴ Samples for laboratory analysis must also be stored and preserved in accordance with procedures found in 40 CFR § 136. **Table 6-3** lists analytical methods, detection limits, hold times, and preservatives for laboratory analysis of dry weather sampling parameters.

⁴ 40 CFR § 136: <http://www.ecfr.gov/cgi-bin/text-idx?SID=b3b41fdea0b7b0b8cd6c4304d86271b7&mc=true&node=pt40.25.136&rgn=div5>

Table 6-3. Required Analytical Methods, Detection Limits, Hold Times, and Preservatives⁴

Analyte or Parameter	Analytical Method	Detection Limit	Max. Hold Time	Preservative
Ammonia	EPA: 350.2, SM: 4500-NH ₃ C	0.05 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2, No preservative required if analyzed immediately
Surfactants	SM: 5540-C	0.01 mg/L	48 hours	Cool ≤6°C
Chlorine	SM: 4500-Cl G	0.02 mg/L	Analyze within 15 minutes	None Required
Temperature	SM: 2550B	NA	Immediate	None Required
Specific Conductance	EPA: 120.1, SM: 2510B	0.2 µs/cm	28 days	Cool ≤6°C
Salinity	SM: 2520	-	28 days	Cool ≤6°C
Indicator Bacteria: <i>E. coli</i> Enterococcus	<i>E. coli</i> EPA: 1603 SM: 9221B, 9221F, 9223 B Other: Colilert®, Colilert-18® <i>Enterococcus</i> EPA: 1600 SM: 9230 C Other: Enterolert®	<i>E. coli</i> EPA: 1 cfu/100mL SM: 2 MPN/100mL Other: 1 MPN/100mL <i>Enterococcus</i> EPA: 1 cfu/100mL SM: 1 MPN/100mL Other: 1 MPN/100mL	8 hours	Cool ≤10°C, 0.0008% Na ₂ S ₂ O ₃
Total Phosphorus	EPA: Manual-365.3, Automated Ascorbic acid digestion-365.1 Rev. 2, ICP/AES4-200.7 Rev. 4.4 SM: 4500-P E-F	EPA: 0.01 mg/L SM : 0.01 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2
Total Nitrogen (Ammonia + Nitrate/Nitrite, methods are for Nitrate-Nitrite and need to be combined with Ammonia listed above.)	EPA: Cadmium reduction (automated)-353.2 Rev. 2.0, SM: 4500-NO ₃ E-F	EPA: 0.05 mg/L SM : 0.05 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2

SM = Standard Methods

6.3 Interpreting Outfall Sampling Results

Outfall analytical data from dry weather sampling can be used to help identify the major type or source of discharge. **Table 6-4** shows values identified by the U.S. EPA and the Center for Watershed Protection as typical screening values for select parameters. These represent the typical concentration (or value) of each parameter expected to be found in stormwater. Screening values that exceed these benchmarks may be indicative of pollution and/or illicit discharges.

Table 6-4. Benchmark Field Measurements for Select Parameters

Analyte or Parameter	Benchmark
Ammonia	>0.5 mg/L
Conductivity	>2,000 µS/cm
Surfactants	>0.25 mg/L
Chlorine	>0.02 mg/L (detectable levels per the 2016 MS4 Permit)
Indicator Bacteria ⁵ : <i>E.coli</i> <i>Enterococcus</i>	<i>E.coli</i> : the geometric mean of the five most recent samples taken during the same bathing season shall not exceed 126 colonies per 100 ml and no single sample taken during the bathing season shall exceed 235 colonies per 100 ml <i>Enterococcus</i> : the geometric mean of the five most recent samples taken during the same bathing season shall not exceed 33 colonies per 100 ml and no single sample taken during the bathing season shall exceed 61 colonies per 100 ml

6.4 Follow-up Ranking of Outfalls and Interconnections

Rowley will update and re-prioritize the initial outfall and interconnection rankings based on information gathered during dry weather screening. The rankings will be updated periodically as dry weather screening information becomes available but will be completed within three (3) years of the effective date of the permit (July 1, 2021).

Outfalls/interconnections where relevant information was found indicating sewer input to the MS4 or sampling results indicating sewer input are highly likely to contain illicit discharges from sanitary sources. Such outfalls/interconnections will be ranked at the top of the High Priority Outfalls category for investigation. Other outfalls and interconnections may be re-ranked based on any new information from the dry weather screening.

7 Catchment Investigations

Once stormwater outfalls with evidence of illicit discharges have been identified, various methods can be used to trace the source of the potential discharge within the outfall catchment area. Catchment investigation techniques include but are not limited to review of maps, historic plans, and records; manhole observation; dry and wet weather sampling; video inspection; smoke testing; and dye testing. This section outlines a systematic procedure to investigate outfall catchments to trace the source of potential illicit discharges. All data collected as part of the catchment investigations will be recorded and reported in each annual report.

⁵ Massachusetts Water Quality Standards: <http://www.mass.gov/eea/docs/dep/service/regulations/314cmr04.pdf>

7.1 System Vulnerability Factors

The Town will review relevant mapping and historic plans and records to identify areas within the catchment with higher potential for illicit connections. The following information will be reviewed:

- Plans related to the construction of the drainage network
- Prior work on storm drains
- Board of Health or other municipal data on septic systems
- Septic system breakouts.

Based on the review of this information, the presence of any of the following **System Vulnerability Factors (SVFs)** will be identified for each catchment:

- History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages
- Common or twin-invert manholes serving storm and sanitary sewer alignments
- Common trench construction serving both storm and sanitary sewer alignments
- Crossings of storm and sanitary sewer alignments where the sanitary system is shallower than the storm drain system
- Sanitary sewer alignments known or suspected to have been constructed with an underdrain system
- Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints
- Areas formerly served by combined sewer systems
- Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken, or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations
- Sewer pump/lift stations, siphons, or known sanitary sewer restrictions where power/equipment failures or blockages could readily result in SSOs
- Any sanitary sewer and storm drain infrastructure greater than 40 years old
- Widespread code-required septic system upgrades required at property transfers (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance)
- History of multiple Board of Health actions addressing widespread septic system failures (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance).

A SVF inventory will be documented for each catchment (see **Table 7-1**), retained as part of this IDDE Plan, and included in the annual report.

Table 7-1. Outfall Catchment System Vulnerability Factor (SVF) Inventory

Rowley, Massachusetts
Revision Date:

Outfall ID	Receiving Water	1 History of SSOs	2 Common or Twin Invert Manholes	3 Common Trench Construction	4 Storm/Sanitary Crossings (Sanitary Above)	5 Sanitary Lines with Underdrains	6 Inadequate Sanitary Level of Service	7 Areas Formerly Served by Combined Sewers	8 Sanitary Infrastructure Defects	9 SSO Potential In Event of System Failures	10 Sanitary and Storm Drain Infrastructure >40 years Old	11 Septic with Poor Soils or Water Table Separation	12 History of BOH Actions Addressing Septic Failure
Sample 1	XYZ River	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No

Presence/Absence Evaluation Criteria:

- 1. History of SSOs, including, but not limited to, those resulting from wet weather, high water table, or fat/oil/grease blockages
- 2. Common or twin-invert manholes serving storm and sanitary sewer alignments
- 3. Common trench construction serving both storm and sanitary sewer alignments
- 4. Crossings of storm and sanitary sewer alignments where the sanitary system is shallower than the storm drain system
- 5. Sanitary sewer alignments known or suspected to have been constructed with an underdrain system
- 6. Inadequate sanitary sewer level of service (LOS) resulting in regular surcharging, customer back-ups, or frequent customer complaints
- 7. Areas formerly served by combined sewer systems
- 8. Sanitary sewer infrastructure defects such as leaking service laterals, cracked, broken, or offset sanitary infrastructure, directly piped connections between storm drain and sanitary sewer infrastructure, or other vulnerability factors identified through Inflow/Infiltration Analyses, Sanitary Sewer Evaluation Surveys, or other infrastructure investigations
- 9. Sewer pump/lift stations, siphons, or known sanitary sewer restrictions where power/equipment failures or blockages could readily result in SSOs
- 10. Any sanitary sewer and storm drain infrastructure greater than 40 years old
- 11. Widespread code-required septic system upgrades required at property transfers (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance)
- 12. History of multiple Board of Health actions addressing widespread septic system failures (indicative of inadequate soils, water table separation, or other physical constraints of the area rather than poor owner maintenance)

7.2 Dry Weather Manhole Inspections

Rowley will implement a dry weather storm drain network investigation that involves systematically and progressively observing, sampling and evaluating key junction manholes in the MS4 to determine the approximate location of suspected illicit discharges or SSOs.

Rowley will be responsible for implementing the dry weather manhole inspection program and making updates as necessary. Infrastructure information will be incorporated into the storm system map, and catchment delineations will be refined based on the field investigation, where necessary. The SVF inventory will also be updated based on information obtained during the field investigations, where necessary.

Several important terms related to the dry weather manhole inspection program are defined by the MS4 Permit as follows:

- **Junction Manhole** is a manhole or structure with two or more inlets accepting flow from two or more MS4 alignments. Manholes with inlets solely from private storm drains, individual catch basins, or both are not considered junction manholes for these purposes.
- **Key Junction Manholes** are those junction manholes that can represent one or more junction manholes without compromising adequate implementation of the illicit discharge program. Adequate implementation of the illicit discharge program would not be compromised if the exclusion of a particular junction manhole as a key junction manhole would not affect the permittee's ability to determine the possible presence of an upstream illicit discharge. A permittee may exclude a junction manhole located upstream from another located in the immediate vicinity or that is serving a drainage alignment with no potential for illicit connections.

For all catchments identified for investigation, during dry weather, field crews will systematically inspect **key junction manholes** for evidence of illicit discharges. This program involves progressive inspection and sampling at manholes in the storm drain network to isolate and eliminate illicit discharges.

The manhole inspection methodology will be conducted in one of two ways (or a combination of both):

- By working progressively up from the outfall and inspecting key junction manholes along the way, or
- By working progressively down from the upper parts of the catchment toward the outfall.

For most catchments, manhole inspections will proceed from the outfall moving up into the system. However, the decision to move up or down the system depends on the nature of the drainage system and the surrounding land use and the availability of information on the catchment and drainage system. Moving up the system can begin immediately when an illicit discharge is detected at an outfall, and only a map of the storm drain system is required. Moving down the system requires more advance preparation and reliable drainage system information on the upstream segments of the storm drain system, but may be more efficient if the sources of illicit discharges are believed to be located in the

upstream portions of the catchment area. Once a manhole inspection methodology has been selected, investigations will continue systematically through the catchment.

Inspection of key junction manholes will proceed as follows:

1. Manholes will be opened and inspected for visual and olfactory evidence of illicit connections. A sample field inspection form is provided in **Appendix C**.
2. If flow is observed, a sample will be collected and analyzed at a minimum for ammonia, chlorine, and surfactants. Field kits can be used for these analyses. Sampling and analysis will be in accordance with procedures outlined in **Section 6**. Additional indicator sampling may assist in determining potential sources (e.g., bacteria for sanitary flows, conductivity to detect tidal backwater, etc.).
3. Where sampling results or visual or olfactory evidence indicate potential illicit discharges or SSOs, the area draining to the junction manhole will be flagged for further upstream manhole investigation and/or isolation and confirmation of sources.
4. Subsequent key junction manhole inspections will proceed until the location of suspected illicit discharges or SSOs can be isolated to a pipe segment between two manholes.
5. If no evidence of an illicit discharge is found, catchment investigations will be considered complete upon completion of key junction manhole sampling.

7.3 Wet Weather Outfall Sampling

Where a minimum of one (1) System Vulnerability Factor (SVF) is identified based on previous information or the catchment investigation, a wet weather investigation must also be conducted at the associated outfall. The Highway Department will be responsible for implementing the wet weather outfall sampling program and making updates as necessary.

Outfalls will be inspected and sampled under wet weather conditions, to the extent necessary, to determine whether wet weather-induced high groundwater in areas served by septic systems result in discharges of sanitary flow to the MS4.

Wet weather outfall sampling will proceed as follows:

1. At least one wet weather sample will be collected at the outfall for the same parameters required during dry weather screening.
2. Wet weather sampling will occur during or after a storm event of sufficient depth or intensity to produce a stormwater discharge at the outfall. There is no specific rainfall amount that will trigger sampling, although minimum storm event intensities that are likely to trigger sanitary sewer interconnections are preferred. To the extent feasible, sampling should occur during the spring (March through June) when groundwater levels are relatively high.

3. If wet weather outfall sampling indicates a potential illicit discharge, then additional wet weather source sampling will be performed, as warranted, or source isolation and confirmation procedures will be followed as described in **Section 7.4**.
4. If wet weather outfall sampling does not identify evidence of illicit discharges, and no evidence of an illicit discharge is found during dry weather manhole inspections, catchment investigations will be considered complete.

A wet weather standard operating procedure can be found is provided in **Appendix C**.

7.4 Source Isolation and Confirmation

Once the source of an illicit discharge is approximated between two manholes, more detailed investigation techniques will be used to isolate and confirm the source of the illicit discharge. The following methods may be used in isolating and confirming the source of illicit discharges

- Sandbagging
- Smoke Testing
- Dye Testing
- CCTV/Video Inspections
- Optical Brightener Monitoring
- IDDE Canines

These methods are described in the sections below. Instructions and Standard Operating Procedures (SOPs) for these and other IDDE methods are provided in **Appendix F**.

Public notification is an important aspect of a detailed source investigation program. Prior to smoke testing, dye testing, or TV inspections, the Highway Department will notify property owners in the affected area. Smoke testing notification will include either telephone calls, door hangers, or email notifications for single family homes, businesses and building lobbies for multi-family dwellings.

7.4.1 Sandbagging

This technique can be particularly useful when attempting to isolate intermittent illicit discharges or those with very little perceptible flow. The technique involves placing sandbags or similar barriers (e.g., caulking, weirs/plates, or other temporary barriers) within outlets to manholes to form a temporary dam that collects any intermittent flows that may occur. Sandbags are typically left in place for 48 hours, and should only be installed when dry weather is forecast. If flow has collected behind the sandbags/barriers after 48 hours it can be assessed using visual observations or by sampling. If no flow collects behind the sandbag, the upstream pipe network can be ruled out as a source of the intermittent discharge. Finding appropriate durations of dry weather and the need for multiple trips to each manhole makes this method both time-consuming and somewhat limiting.

7.4.2 Smoke Testing

Smoke testing involves injecting non-toxic smoke into drain lines and noting the emergence of smoke from sanitary sewer vents in illegally connected buildings or from cracks and leaks in the system itself. Typically a smoke bomb or smoke generator is used to inject the smoke into the system at a catch basin or manhole and air is then forced through the system. Test personnel are placed in areas where there are suspected illegal connections or cracks/leaks, noting any escape of smoke (indicating an illicit connection or damaged storm drain infrastructure). It is important when using this technique to make proper notifications to area residents and business owners as well as local police and fire departments.

If the initial test of the storm drain system is unsuccessful then a more thorough smoke-test of the sanitary sewer lines can also be performed. Unlike storm drain smoke tests, buildings that do not emit smoke during sanitary sewer smoke tests may have problem connections and may also have sewer gas venting inside, which is hazardous.

It should be noted that smoke may cause minor irritation of respiratory passages. Residents with respiratory conditions may need to be monitored or evacuated from the area of testing altogether to ensure safety during testing.

7.4.3 Dye Testing

Dye testing involves flushing non-toxic dye into plumbing fixtures such as toilets, showers, and sinks and observing nearby storm drains and sewer manholes as well as stormwater outfalls for the presence of the dye. Similar to smoke testing, it is important to inform local residents and business owners. Police, fire, and local public health staff should also be notified prior to testing in preparation of responding to citizen phone calls concerning the dye and their presence in local surface waters.

A team of two or more people is needed to perform dye testing (ideally, all with two-way radios). One person is inside the building, while the others are stationed at the appropriate storm sewer and sanitary sewer manholes (which should be opened) and/or outfalls. The person inside the building adds dye into a plumbing fixture (i.e., toilet or sink) and runs a sufficient amount of water to move the dye through the plumbing system. The person inside the building then radios to the outside crew that the dye has been dropped, and the outside crew watches for the dye in the storm sewer and sanitary sewer, recording the presence or absence of the dye.

The test can be relatively quick (about 30 minutes per test), effective (results are usually definitive), and inexpensive. Dye testing is best used when the likely source of an illicit discharge has been narrowed down to a few specific houses or businesses.

7.4.4 CCTV/Video Inspection

Another method of source isolation involves the use of mobile video cameras that are guided remotely through stormwater drain lines to observe possible illicit discharges. IDDE program staff can review the videos and note any visible illicit discharges. While this tool is both effective and usually definitive, it can be costly and time consuming when compared to other source isolation techniques.

7.4.5 Optical Brightener Monitoring

Optical brighteners are fluorescent dyes that are used in detergents and paper products to enhance their appearance. The presence of optical brighteners in surface waters or dry weather discharges suggests there is a possible illicit discharge or insufficient removal through adsorption in nearby septic systems or wastewater treatment. Optical brightener monitoring can be done in two ways. The most common, and least expensive, methodology involves placing a cotton pad in a wire cage and securing it in a pipe, manhole, catch basin, or inlet to capture intermittent dry weather flows. The pad is retrieved at a later date and placed under UV light to determine the presence/absence of brighteners during the monitoring period. A second methodology uses handheld fluorometers to detect optical brighteners in water sample collected from outfalls or ambient surface waters. Use of a fluorometer, while more quantitative, is typically more costly and is not as effective at isolating intermittent discharges as other source isolation techniques.

7.4.6 IDDE Canines

Dogs specifically trained to smell human related sewage are becoming a cost-effective way to isolate and identify sources of illicit discharges. While not widespread at the moment, the use of IDDE canines is growing as is their accuracy. The use of IDDE canines is not recommended as a standalone practice for source identification; rather it is recommended as a tool to supplement other conventional methods, such as dye testing, in order to fully verify sources of illicit discharges.

7.4.7 On-site Septic System Investigation

Three types of on-site investigations can be performed at individual properties to determine if the septic system is failing, including homeowner surveys, surface condition analysis and a detailed system inspection. The first two investigations are rapid and relatively simple assessments typically conducted in targeted watershed areas. A detailed system inspection are more thorough and investigate the function of the system by a certified professional.

7.4.7.1 Homeowner Survey

The homeowner survey consists of a brief interview with the property owner to determine the potential for current or future failure of the septic system. Some questions that may be asked during a survey include:

- How many people live in the house?
- What is the septic tank capacity?
- Do drains in the house empty slowly or not at all?
- When was the last time the system was inspected or maintained?
- Does sewage back up into the house through drain lines?
- Are there any wet, smelly spots in the yard?
- Is the septic tank effluent piped so it drains to a road ditch, a storm sewer, a stream, or is it connected to a farm drain tile?

7.4.7.2 Septic System Surface Condition Assessment

A surface condition assessment is when field crews look for obvious indicators that point to current or potential production of illicit discharges by the septic system. Some key surface conditions to look for include:

- Found odors in the yard
- Wet, spongy ground; lush plant growth; or burnt grass near the drain field
- Algal bloom or excessive weed growth in adjacent ditches, ponds and streams
- Shrubs or trees with root damage within 10 feet of the system
- Cars, boats or heavy equipment located over the drain field that could crush lateral pipes
- Storm water flowing over the drain field
- Cave-ins and exposed system components
- Visible liquid on the surface of the drain field
- Obvious system bypass (e.g., straight pipe discharge)

7.4.7.3 Detailed Septic System Investigation

The detailed system inspection is a much more thorough inspection of the performance and function of the septic system and must be completed by a certified professional. The inspector certifies the structural integrity of all components of the system and checks the depth of solids in the septic tank to determine if the system needs to be pumped out. The inspector also sketches the system, and estimates distance to groundwater, surface water, and drinking water sources.

Although not always incorporated into the inspection, dye testing can sometimes point to leaks from broken pipes, or direct discharges through straight pipes that might be missed during routine inspection. Dye can be introduced into plumbing fixtures in the home and flushed with enough running water. The inspector then watches the septic field, nearby ditches, watercourses and manholes for any signs of the dye. The dye may take several hours to appear, so crews may want to place charcoal packets in adjacent waters to capture dye until they can return later to retrieve them.

Infrared imagery is a special type of photography with gray or color scales that represent differences in temperature and emissivity of objects in the image and can be used to locate sewage discharges. Several different infrared imagery techniques can be used to identify illicit discharges including aerial infrared thermography and color infrared aerial photography.

Infrared thermography is increasingly being used to detect illicit discharges and failing septic systems. The technique uses the temperature difference of sewage as a marker to locate these illicit discharges. The equipment needed to conduct aerial infrared thermography includes an aircraft (plane or helicopter); a high-resolution, large format, infrared camera with appropriate mount; a GPS unit; and digital recording equipment. If a plane is used, a higher resolution camera is required since it must operate at higher altitudes. Pilots should be experienced since flights take place at night, slowly, and at a low altitude. The camera may be handheld, but a mounted camera will provide significantly clearer results for a larger area. The GPS can be combined with a mobile mapping program and a video encoder-decoder that encodes and displays the coordinates, date, and time. The infrared data are analyzed after the flight by trained analysts to locate suspected discharges, and field crews then inspect the ground-truthed sites to confirm the presence of a failing septic system.

Late fall, winter, and early spring are typically the best times of year to conduct these investigations in most regions of the country. This allows for a bigger difference between receiving water and discharge

temperatures, and interference from vegetation is minimized. In addition, flights should take place at night to minimize reflected and direct daylight solar radiation that may adversely affect the imagery.

Color infrared aerial photography looks for changes in plant growth, differences in soil moisture content, and the presence of standing water on the ground to primarily identify failing septic systems. Similar to thermography, it is recommended that flights take place at night, during leaf off conditions, or when the water table is at a seasonal high which is when most failures typically occur.

7.5 Illicit Discharge Removal

When the specific source of an illicit discharge is identified, the ##MUNICIPALITY will exercise its authority as necessary to require its removal. The annual report will include the status of IDDE investigation and removal activities including the following information for each confirmed source:

- The location of the discharge and its source(s)
- A description of the discharge
- The method of discovery
- Date of discovery
- Date of elimination, mitigation or enforcement action OR planned corrective measures and a schedule for completing the illicit discharge removal
- Estimate of the volume of flow removed.

7.5.1 Confirmatory Outfall Screening

Within one (1) year of removal of all identified illicit discharges within a catchment area, confirmatory outfall or interconnection screening will be conducted. The confirmatory screening will be conducted in dry weather unless System Vulnerability Factors have been identified, in which case both dry weather and wet weather confirmatory screening will be conducted. If confirmatory screening indicates evidence of additional illicit discharges, the catchment will be scheduled for additional investigation.

7.6 Ongoing Screening

Upon completion of all catchment investigations and illicit discharge removal and confirmation (if necessary), each outfall or interconnection will be re-prioritized for screening and scheduled for ongoing screening once every five (5) years. Ongoing screening will consist of dry weather screening and sampling consistent with the procedures described in **Section 6** of this plan. Ongoing wet weather screening and sampling will also be conducted at outfalls where wet weather screening was required due to System Vulnerability Factors and will be conducted in accordance with the procedures described in **Section 7.3**. All sampling results will be reported in the annual report.

8 Training

Annual IDDE training will be made available to all employees involved in the IDDE program. This training will at a minimum include information on how to identify illicit discharges and SSOs and may also include additional training specific to the functions of particular personnel and their function within the framework of the IDDE program. Training records will be maintained in **Appendix E**. The frequency and type of training will be included in the annual report.

9 Progress Reporting

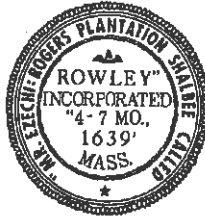
The progress and success of the IDDE program will be evaluated on an annual basis. The evaluation will be documented in the annual report and will include the following indicators of program progress:

- Number of SSOs and illicit discharges identified and removed
- Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedure
- Number of dry weather outfall inspections/screenings
- Number of wet weather outfall inspections/sampling events
- Number of enforcement notices issued
- All dry weather and wet weather screening and sampling results
- Estimate of the volume of sewage removed, as applicable
- Number of employees trained annually.

The success of the IDDE program will be measured by the IDDE activities completed within the required permit timelines.

Appendix A

Legal Authority (IDDE Bylaw or Ordinance)



Town of Rowley

Massachusetts 01969

39 Central Street

P. O. Box 783

Board of Health

E-Mail health@townofrowley.org

(978) 948 2231

FAX (978) 948 7196

REGULATION PROHIBITING ILLICIT CONNECTIONS AND DISCHARGES TO THE MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

1. PURPOSE

The purpose of this regulation is to prohibit illicit connections and non-stormwater discharges to the Town of Rowley's Municipal Separate Storm Sewer System (MS4). Non-stormwater discharges to the MS4 contain contaminants and supply additional flows which are major causes of

- a. impairment of water quality and flow in lakes, ponds, streams, rivers, wetlands, and groundwater;
- b. contamination of drinking water supplies;
- c. alteration or destruction of aquatic and wildlife habitat; and
- d. flooding.

Regulation of illicit connections and discharges to the MS4 is necessary for the protection of the Town of Rowley's water bodies and groundwater, and to safeguard the public health, safety, welfare, and the environment.

The objectives of this regulation are:

- a. to prevent pollutants from entering the MS4;
- b. to prohibit illicit connections and unauthorized discharges to the MS4;
- c. to remove all such illicit connections and discharges;
- d. to comply with state and federal statutes and regulations relating to stormwater discharges;
- e. to establish the legal authority to ensure compliance with the provisions of this regulation through proper inspection, monitoring, and enforcement; and
- f. to prevent contamination of drinking water supplies.

2. AUTHORITY

This regulation is adopted pursuant to Sections 31 and 127 of Chapter 111 of the Massachusetts General Laws as amended, and the regulations of the Federal Clean Water Act found at 40 CFR 122.34. The Rowley Board of Health shall administer, implement, and enforce this regulation. Any powers granted to or duties imposed upon the Board may be delegated by the Board to its

employees or agents. The Board of Health may promulgate rules and regulations to effectuate the purposes of this regulation. Failure by the Board of Health to promulgate such rules and regulations shall not have the effect of suspending or invalidating this regulation.

3. DEFINITIONS

For the purposes of this regulation, the following definitions and provisions shall apply:

- a. **Authorized Enforcement Agency** — The Board of Health, its employees or agents designated to enforce this regulation.
- b. **Best Management Practice (BMP)** — An activity, procedure, restraint, or structural improvement that helps reduce the quantity or improve the quality of stormwater runoff
- c. **Clean Water Act** — The Federal Water Pollution Control Act (33 U.S.C. section 1251 *et seq.*) and as hereafter amended.
- d. **Discharge of Pollutants** — The addition from any source of any pollutant or combination of pollutants into the MS4 or into waters of the United States or Commonwealth of Massachusetts from any source.
- e. **Groundwater** — Water beneath the surface of the ground.
- f. **Illicit Connection** — A surface or subsurface drain or conveyance which allows an illicit discharge into the MS4, including without limitation: sewage, process wastewater or wash water, and any connections from indoor drains, sinks, or toilets regardless of whether said connection was previously allowed, permitted, or approved before the effective date of this regulation.
- g. **Illicit Discharge** — Direct or indirect discharge to the MS4 that is not composed entirely of stormwater, except as specifically exempted in Section 7 of this regulation. The term does not include a discharge in compliance with an NPDES Storm Water Discharge Permit or resulting from fire-fighting activities or municipal ice and snow control operations.
- h. **Impervious Surface** — Any material or structure on or above the ground that prevents water from infiltrating the underlying soil. Impervious surface includes without limitation roads, paved parking lots, sidewalks, and rooftops.
- i. **Municipal Separate Storm Sewer System (MS4)** — The system of conveyances designed or used for collecting or conveying stormwater, including any road with a drainage system, street, gutter, curb, inlet, piped storm drain, pumping facility, retention or detention basin, natural or man-made or altered drainage channel, reservoir, and other drainage structure that together comprise the storm drainage system owned and/or operated by the Town of Rowley.
- j. **National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit** — A permit issued by the U.S. Environmental Protection Agency or jointly with the State of Massachusetts that authorizes the discharge of pollutants to waters of the United States or Commonwealth.
- k. **Non-Stormwater Discharge** — A discharge to the MS4 not comprised entirely of stormwater.
- l. **Person** — An individual, partnership, association, firm, company, trust, corporation, agency, authority, department or political subdivision of the Commonwealth or the federal government, to the extent permitted by law, and any officer, employee, or agent of such person.
- m. **Pollutant** — Any element or property of sewage, residential, agricultural, industrial, or commercial waste, runoff; leachate, heated effluent, or other matter whether originating at a point or non-point source, that is or may be introduced into any storm drainage system or waters of the United States and/or Commonwealth. Pollutants shall include without limitation:

- 1) paints, varnishes, solvents;
 - 2) oil, grease, antifreeze, other automotive fluids and/or products;
 - 3) non-hazardous liquid and solid wastes;
 - 4) refuse, garbage, litter, rubbish, yard wastes, or other discarded or abandoned objects, ordnances, accumulations, or floatables;
 - 5) pesticides, herbicides, and fertilizers;
 - 6) hazardous materials and wastes;
 - 7) sewage;
 - 8) dissolved and particulate metals;
 - 9) metal objects or materials;
 - 10) animal wastes;
 - 11) rock, sand, salt, soils; and
 - 12) construction wastes and/or residues.
- n. **Process Wastewater** — Water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any material, intermediate product, finished product, or waste product.
- o. **Recharge** — The process by which groundwater is replenished by precipitation through the percolation of runoff and surface water through the soil.
- p. **Stormwater** — Runoff from precipitation or snowmelt.
- q. **Toxic or Hazardous Material or Waste** — Any material, which, because of its quantity, concentration, chemical, corrosive, flammable, reactive, toxic, infectious or radioactive characteristics, either separately or in combination with any substance or substances, constitutes a present or potential threat to human health, safety, welfare or to the environment. Toxic or hazardous materials include without limitation:
- 1) any synthetic organic chemical;
 - 2) petroleum products;
 - 3) heavy metals;
 - 4) radioactive or infectious waste;
 - 5) acid and alkali substances;
 - 6) any substance defined as Toxic or Hazardous under M.G.L. Ch. 21C and Ch. 21E, and the regulations at 310 CMR 30000 and 310 CMR 40.000; and
 - 7) Any substance listed as hazardous under 40 CFR 261.
- r. **Watercourse** — A natural or man-made channel through which water flows or a stream of water, including a river, brook or underground stream.
- s. **Waters of the Commonwealth** — All waters within the jurisdiction of the Commonwealth, including, without limitation, rivers, streams, lakes, ponds, springs, impoundments, estuaries, wetlands, coastal waters, and groundwater.
- t. **Wastewater** — Any sanitary waste, sludge, or septic tank or cesspool overflow, and water that during manufacturing, cleaning, or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

4. APPLICABILITY

This regulation shall apply to flows entering the municipally owned and/or operated storm drainage

system (MS4).

5. PROHIBITED ACTIVITIES

The following activities are prohibited:

Illicit Connections — No person shall construct, use, allow, maintain or continue any illicit connection to the municipal storm drainage system (MS4), regardless of whether the connection was permissible under applicable law, regulation, or custom at the time of connection.

Illicit Discharges — No person shall dump, discharge, cause, or allow to be discharged any pollutant or non-stormwater discharge into the municipal storm drainage system (MS4), into a watercourse, or into waters of the United States and/or Commonwealth.

Obstruction of the MS4 — No person shall obstruct or interfere with the normal flow of stormwater into or out of the municipal storm drainage system (MS4) without prior written approval from the Board of Health.

6. EXEMPTIONS

Discharges or flows resulting from fire-fighting activities and Highway Department ice and snow control operations are exempt. In addition, the following non-stormwater discharges or flows are exempt provided that the source is not a significant contributor of pollution to the municipal storm drainage system (MS4):

- a. waterline flushing;
- b. flow from potable water sources;
- c. springs;
- d. natural flow from riparian habitats and wetlands;
- e. diverted stream flow;
- f. rising groundwater;
- g. uncontaminated groundwater infiltration as defined in 40 CFR 35.2005(20), or uncontaminated pumped groundwater;
- h. water from exterior foundation drains, footing drains (not including active groundwater dewatering systems, such as dewatering excavations for foundations or pipelines), crawl space pumps, or air conditioning condensation;
- i. discharge from landscape irrigation or lawn watering;
- j. water from individual residential car washing;
- k. discharge from dechlorinated swimming pool water (less than one part per million chlorine) provided the water is allowed to stand for one week prior to draining and the pool is drained in such a way as to not cause a nuisance;
- l. discharge of water from street sweepers;
- m. dye testing, provided verbal notification is given to the Board of Health prior to the time of the test;
- n. non-stormwater discharge permitted under an NPDES permit, waiver, or waste discharge order administered under the authority of the U.S. Environmental Protection Agency, provided that the discharge is in full compliance with the requirements of the permit, waiver, or order and applicable laws and regulations; and

- o. discharge for which advanced written approval is received from the Board of Health as necessary to protect public health, safety, welfare, and the environment.

7. EMERGENCY SUSPENSION OF MUNICIPAL STORM DRAINAGE SYSTEM (MS4) ACCESS

- a. The Board of Health may suspend access to the municipal storm drainage system (MS4) to any person or property without prior written notice when such suspension is necessary to stop an actual or threatened illegal discharge that presents or may present imminent risk of harm to the public health, safety, welfare, or the environment. In the event any person fails to comply with an emergency suspension order, the Board of Health may take all reasonable steps to prevent or minimize harm to the public health, safety, welfare or the environment.
- b. Any person discharging to the municipal storm drainage system (MS4) in violation of this regulation may have his/her access to the storm drainage system terminated if such termination would abate or reduce an illicit discharge. The Board of Health shall notify a violator of the proposed termination of storm drainage system access. The violator may petition the Board of Health for reconsideration and a hearing. A person commits an offense if he/she reinstates access to the storm drainage system without prior written approval from the Board of Health.

8. NOTIFICATION OF SPILLS

Notwithstanding any other requirements of local, state, or federal law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation, has information of any known or suspected release of materials at that facility or operation which is resulting or may result in illegal discharge of pollutants, that person shall take all necessary steps to ensure containment and cleanup of the release. In the event of a release of oil or hazardous materials, the person shall immediately notify the Rowley Fire and Police Departments, the Highway Department, and the Board of Health. In the event of a release of non-hazardous material, said person shall notify the Board of Health no later than the next business day. Written confirmation of all telephone, facsimile, or in-person notifications shall be provided to the Board of Health within three (3) business days thereafter. If the discharge of prohibited materials is from a commercial or industrial facility, the facility owner or operator shall retain on-site a written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for period of at least three (3) years.

9. ENFORCEMENT

a. Board of Health

The Board of Health or its authorized agent shall enforce this regulation and any rules and regulations promulgated thereunder, as well as the terms and conditions of all permits, notices, and orders, and may pursue all civil and criminal remedies for violations of the regulation.

b. Civil Relief

If anyone violates the provisions of this regulation or any rule, regulation, permit, notice, or order issued thereunder, the Board of Health may seek injunctive relief in a court of competent jurisdiction to restrain the person from activities which would create further violations or compelling the person to abate or remediate the violation.

c. Orders

The Board of Health may issue a written order to enforce the provisions of this regulation and any rules and regulations thereunder, which may include: (1) elimination of illicit connections or discharges to the municipal storm drainage system; (2) termination of access to the storm drainage system; (3) performance of monitoring, analyses, and reporting; (4) cessation of unlawful discharges, practices, or operations; and (5) remediation of contamination in connection therewith. If the Board of Health determines that abatement or remediation of contamination is required, the order shall set forth a deadline for completion of the abatement or remediation. Said order shall further advise that, should the violator or property owner fail to abate or perform remediation within the specified deadline, the Town of Rowley may, at its option, undertake such work, and expenses thereof shall be charged to the violator or property owner.

Within thirty (30) days after completing all measures necessary to abate the violation or to perform remediation, the violator and the property owner shall be notified of the costs incurred by the Town, including administrative costs. The violator or property owner may file a written protest objecting to the amount or basis of costs with the Board of Health within thirty (30) days of receipt of the notification of the costs incurred. If the amount due is not received by the expiration of the time in which to file a protest or within thirty (30) days following a decision of the Board of Health affirming or reducing the costs, or from a final decision of a court of competent jurisdiction, the costs shall become a special assessment against the property owner and shall constitute a lien on the owner's property for the amount of said costs. Interest shall begin to accrue on any unpaid costs at the statutory rate provided in M.G.L. Chapter 59, Section 57 after the thirty-first day at which the costs first become due.

d. Criminal and Civil Penalties

Any person who violates any provision of this bylaw, regulation, or the terms or conditions in any permit or order prescribed or issued thereunder, shall be subject to a fine not to exceed \$300 for each day such violation occurs or continues, or to a civil penalty, which may be assessed in an action brought on behalf of the Town in any court of competent jurisdiction.

e. Non-Criminal Disposition

As an alternative to criminal prosecution or civil action, the Town of Rowley may elect to utilize the non-criminal disposition procedure set forth in M.G.L. Chapter 40, Section 21D. The Board of Health shall be the enforcing entity. The penalty for the 1st violation shall be up to \$100. The penalty for the 2nd violation shall be up to \$200. The penalty for the 3rd and subsequent violations shall be \$300. Each day or part thereof that such violation occurs or continues shall constitute a separate offense.

f. Entry to Perform Duties under this Bylaw

To the extent permitted by state law, or if authorized by the owner or other party in control of the property, the Board of Health, its agents, officers, and employees may enter upon privately owned property for the purpose of performing their duties under this regulation and may make or cause to be made such examinations, surveys, or sampling as the Board of Health deems reasonably necessary.

g. Appeals

The decisions or orders of the Board of Health shall be final. Further relief shall be to a court of competent jurisdiction.

h. Remedies Not Exclusive

The remedies listed in this regulation are not exclusive of any other remedies available under any applicable federal, state, or local law.

10. SEVERABILITY

The provisions of this regulation are hereby declared to be severable. If any provision, paragraph, sentence, or clause of this regulation shall be held invalid for any reason, all other provisions shall continue in full force and effect.

11. TRANSITIONAL PROVISIONS

Residential property owners shall comply with this regulation on a schedule set forth in the Board of Health compliance order, but such property owners shall in no case have more than six (6) months from the effective date of the regulation to comply with its provisions, unless good cause is shown for the failure to comply with the regulation during that period.

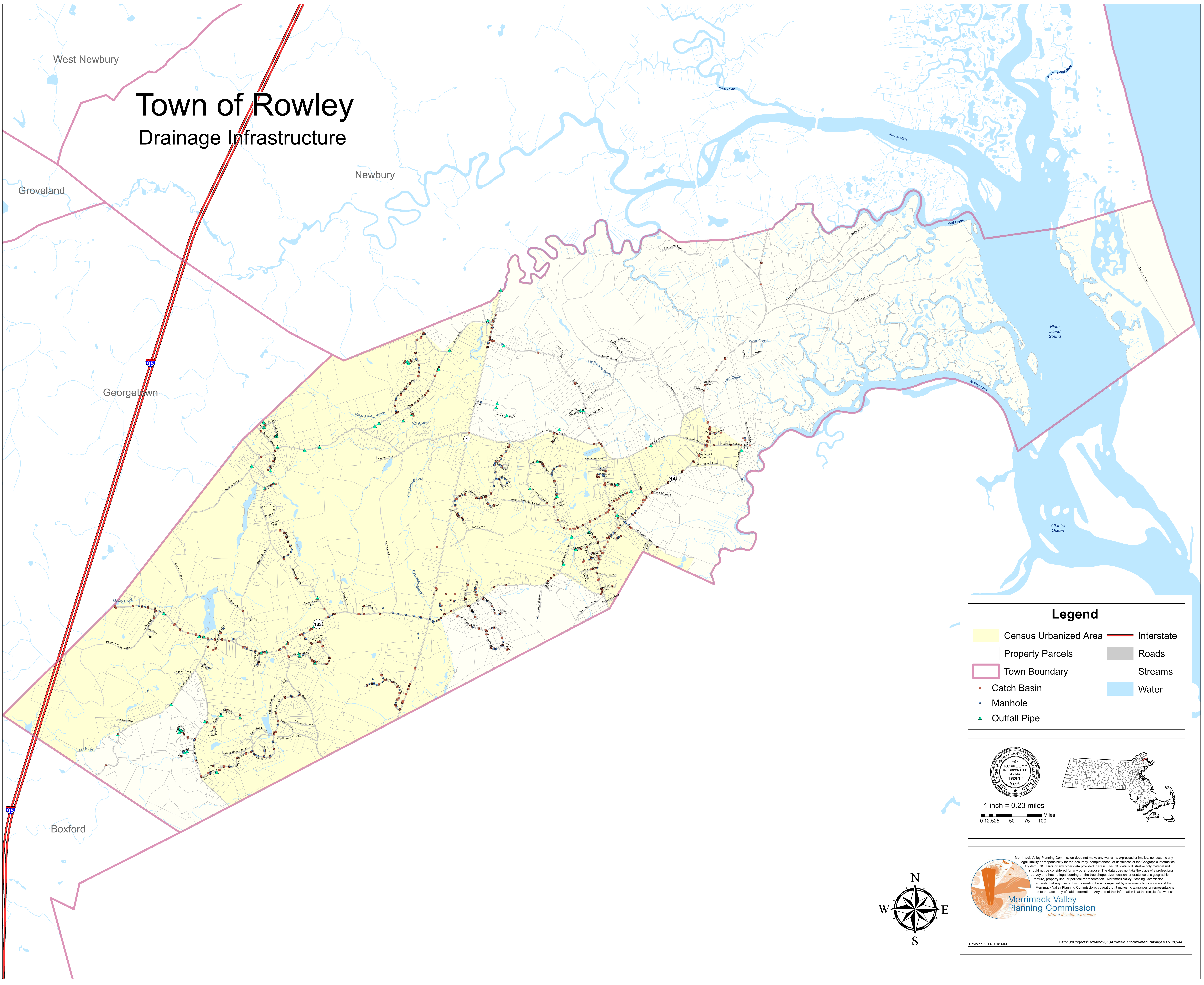
Per vote of the Rowley Board of Health on January 7, 2008
These regulations shall take effect on February 1, 2008

Appendix B

Storm System Mapping

Town of Rowley

Drainage Infrastructure



Legend

Census Urbanized Area

Property Parcels

Town Boundary

Catch Basin

Manhole

Outfall Pipe

Interstate

Roads

Streams

Water

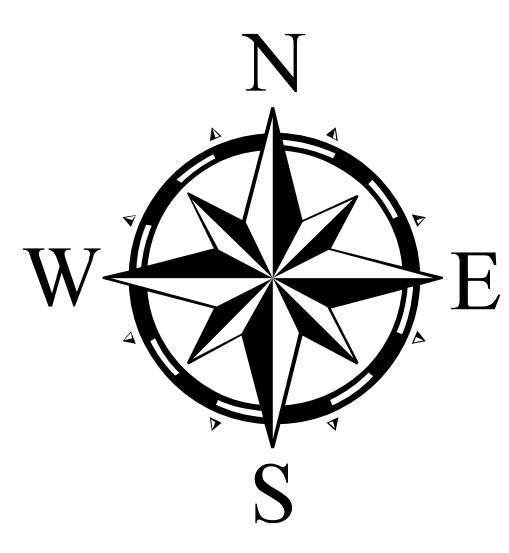
1 inch = 0.23 miles
0 12.5 25 50 75 100 Miles

Merrimack Valley Planning Commission does not make any warranty, expressed or implied, nor assume any legal liability or responsibility for the accuracy, completeness, or usefulness of the Geographic Information System (GIS) Data or any other data provided herein. The GIS data is illustrative only material and should not be considered for any other purpose. The data does not take the place of a professional survey and has no legal bearing on the true shape, size, location, or existence of a geographic feature, property line, or political representation. Merrimack Valley Planning Commission requests that any use of this information be accompanied by a reference to its source and the Merrimack Valley Planning Commission's caveat that it makes no warranties or representations as to the accuracy of said information. Any use of this information is at the recipient's own risk.

Merrimack Valley Planning Commission
plan • develop • promote

Revision: 9/11/2018 MM

Path: J:\Projects\Rowley\2018\Rowley_StormwaterDrainageMap_36x44



Appendix C

Field Forms, Sample Bottle Labels, and Chain of Custody Forms

Appendix D

Water Quality Analysis Instructions, User's Manuals and Standard Operating Procedures

DRY WEATHER OUTFALL INSPECTION

Introduction

Outfalls from an engineered storm drain system can be in the form of pipes or ditches. Under current and pending regulations, it is important to inspect and document water quality from these outfalls under both dry weather and wet weather conditions. SOP “Wet Weather Outfall Inspection”, covers the objectives of that type of inspection. This SOP discusses the dry weather inspection objectives, and how they differ from wet weather inspection objectives.

During a dry weather period, it is anticipated that minimal flow from stormwater outfalls will be observed. Therefore, dry weather inspections aim to characterize any/all flow observed during a dry weather period and identify potential source(s) of an illicit discharge through qualitative testing; further described in SOP “Water Quality Screening in the Field”.

Objectives of Dry Weather Inspections

A dry weather period is a time interval during which less than 0.1 inch of rain is observed across a minimum of 72 hours. Unlike wet weather sampling, dry weather inspections are not intended to capture a “first flush” of stormwater discharge, rather they are intended to identify any/all discharges from a stormwater outfall during a period without recorded rainfall. The objective of inspections during a dry weather period is to characterize observed discharges and facilitate detection of illicit discharges.

Visual Condition Assessment

The attached Dry Weather Outfall Inspection Survey is a tool to assist in documenting observations related to the both quantitative and qualitative characteristics of any/all flows conveyed by the structure during a dry period.

For any visual observation discharge from a stormwater outfall, an investigation into the pollution source should occur, but the following are often true:

1. Foam: indicator of upstream vehicle washing activities, or an illicit discharge.
2. Oil sheen: result of a leak or spill.
3. Cloudiness: indicator of suspended solids such as dust, ash, powdered chemicals and ground up materials.
4. Color or odor: Indicator of raw materials, chemicals, or sewage.
5. Excessive sediment: indicator of disturbed earth of other unpaved areas lacking adequate erosion control measures.
6. Sanitary waste and optical enhancers (fluorescent dyes added to laundry detergent): indicators of illicit discharge.
7. Orange staining: indicator of high mineral concentrations.

Both bacteria and petroleum can create a sheen on the water surface. The source of the sheen can be differentiated by disturbing it, such as with a pole. A sheen caused by oil will remain intact and move in a swirl pattern; a sheen caused by bacteria will separate and appear “blocky”. Bacterial or naturally occurring sheens are usually silver or relatively dull in color and will break up into a number of small patches of sheen. The cause may be presence of iron, decomposition of organic material or presence of certain bacteria. Bacterial sheen is not a pollutant but should be noted.

Many of these observations are indicators of an illicit discharge. Examples of illicit discharges include: cross-connections of sewer services to engineered storm drain systems; leaking septic systems; intentional discharge of pollutants to catch basins; combined sewer overflows; connected floor drains; and sump pumps connected to the system (under some circumstances). Additional guidelines for illicit discharge investigations are included in SOP 10, “Locating Illicit Discharges”. If dry weather flow is present at the outfall, and the flow does not appear to be an obvious illicit discharge (e.g. flow is clear, odorless, etc.) attempt to identify the source of flow (e.g. intermittent stream, wetlands drainage, etc.) and document the discharge for future comparison.

Although many of the observations are indicators of illicit discharge it should be noted that several of these indicators may also occur naturally. Orange staining may be the result of naturally occurring iron, and thus unrelated to pollution. Foam can be formed when the physical characteristics of water are altered by the presence of organic materials. Foam is typically found in waters with high organic content such as bog lakes, streams that originate from bog lakes, productive lakes, wetlands, or woody areas. To determine the difference between natural foam and foam cause by pollution, consider the following:

1. Wind direction or turbulence: natural foam occurrences on the beach coincide with onshore winds. Often, foam can be found along a shoreline and/or on open waters during windy days. Natural occurrences in rivers can be found downstream of a turbulent site.
2. Proximity to a potential pollution source: some entities including the textile industry, paper production facilities, oil industries, and fire fighting activities work with materials that cause foaming in water. If these materials are released to a water body in large quantities, they can cause foaming. Also, the presence of silt in water, such as from a construction site can cause foam.
3. Feeling: natural foam is typically persistent, light, not slimy to the touch.
4. Presence of decomposing plants or organic material in the water.

Optical enhancers, fluorescent dyes added to laundry detergent, are typically detected through the use of clean, white cotton pads placed within the discharge for several days, dried then viewed under a UV light. If the cotton pad displays fluorescent patches, optical enhancers are present. Optical enhancers are occasionally visible as a bluish-purple haze on the water surface; however the testing method should be used to confirm the presence of optical enhancers.

The Dry Weather Outfall Inspection Survey includes fields where these and other specific observations can be noted. The inspector shall indicate the presence of a specific water quality indicator or parameter

by marking “Yes”. If “Yes” is marked, provide additional details in the comments section. If the indicator in question is not present, mark “No”.

Within the comments section, provide additional information with regard to recorded precipitation totals, or more detailed descriptions of observations made during the inspection and corrective actions taken.

Measuring Water Quality

Based on the results of the Visual Condition Assessment, it may be necessary to collect additional data about water quality. Water quality samples can be in the form of screening using field test kits and instrumentation, or by discrete analytical samples processed by a laboratory.

Information on selecting and using field test kits and instrumentation is included in SOP 13, “Water Quality Screening in the Field.” The Inspection Survey also provides values for what can be considered an appropriate benchmark for a variety of parameters that can be evaluated in the field.

If the results of screening using field test kits indicate that the outfall’s water quality exceeds the benchmarks provided, collection of discrete analytical samples should be considered.

Analytical Sample Collection

Sample collection methods may vary based on specific outfall limitations, but shall follow test procedures outlined in 40 CFR 136. A discrete manual or grab sample can classify water at a distinct point in time. These samples are easily collected and used primarily when the water quality of the discharge is expected to be homogeneous, or unchanging, in nature. A flow-weighted composite sample will classify water quality over a measured period of time. These samples are used when the water quality of the discharge is expected to be heterogeneous, or fluctuating, in nature. Grab samples are more common for dry weather outfall inspections due to the time-sensitive nature of the process.

Protocols for collecting a grab sample shall include the following:

1. Do not eat, drink or smoke during sample collection and processing.
2. Do not collect or process samples near a running vehicle.
3. Do not park vehicles in the immediate sample collection area, including both running and non-running vehicles.
4. Always wear clean, powder-free nitrile gloves when handling sample containers and lids.
5. Never touch the inside surface of a sample container or lid, even with gloved hands.
6. Never allow the inner surface of a sample container or lid to be contacted by any material other than the sample water.
7. Collect samples while facing upstream and so as not to disturb water or sediments in the outfall pipe or ditch.
8. Do not overfill sample containers, and do not dump out any liquid in them. Liquids are often added to sample containers intentionally by the analytical laboratory as a preservative or for pH adjustment.

9. Slowly lower the bottle into the water to avoid bottom disturbance and stirring up sediment.
10. Do not allow any object or material to fall into or contact the collected water sample.
11. Do not allow rainwater to drip from rain gear or other surfaces into sample containers.
12. Replace and tighten sample container lids immediately after sample collection.
13. Accurately label the sample with the time and location.
14. Document on the Wet Weather Outfall Inspection Survey that analytical samples were collected, specify parameters, and note the sample time on the Inspection Survey. This creates a reference point for samples.

Analytical Sample Quality Control and Assurance

Upon completion of successful sample collection, the samples must be sent or delivered to a MassDEP-approved laboratory for analytical testing. Quality control and assurance are important to ensuring accurate analytical test results.

Sample preservation is required to prevent contaminate degradation between sampling and analysis, and should be completed in accordance with 40 CFR 136.3.

Maximum acceptable holding times are also specified for each analytical method in 40 CFR 136.3. Holding time is defined as the period of time between sample collection and extraction for analysis of the sample at the laboratory. Holding time is important because prompt laboratory analysis allows the laboratory to review the data and if analytical problems are found, re-analyze the affected samples within the holding times.

Chain of custody forms are designed to provide sample submittal information and document transfers of sample custody. The forms are typically provided by the laboratory and must be completed by the field sampling personnel for each sample submitted to the lab for analysis. The document must be signed by both the person releasing the sample and the person receiving the sample every time the sample changes hands. The sampling personnel shall keep one copy of the form and send the remaining copies to the laboratory with the samples. Custody seals, which are dated, signed and affixed to the sample container, may be used if the samples are shipped in a cooler via courier or commercial overnight shipping.

Attachments

1. Dry Weather Outfall Inspection Survey

Related Standard Operating Procedures

1. Wet Weather Outfall Inspection
2. Locating Illicit Discharges
3. Water Quality Screening in the Field

WET WEATHER OUTFALL INSPECTION

Introduction

Outfalls from an engineered storm drain system can be in the form of pipes or ditches. Under current and pending regulations, it is important to inspect and document water quality from these outfalls under both dry weather and wet weather conditions. SOP “Dry Weather Outfall Inspection”, covers the objectives of that type of inspection. This SOP discusses wet weather inspection objectives and how they differ from dry weather inspection objectives. The primary difference is that wet weather inspection aims to describe and evaluate the first flush of stormwater discharged from an outfall during a storm, representing the maximum pollutant load managed by receiving water.

Definition of Wet Weather

A storm is considered a representative wet weather event if greater than 0.1 inch of rain falls and occurs at least 72 hours after the previously measurable (greater than 0.1 inch of rainfall) storm event. In some watersheds, based on the amount of impervious surface present, increased discharge from an outfall may not result from 0.1 inch of rain. An understanding of how outfalls respond to different events will develop as the inspection process proceeds over several months, allowing the inspectors to refine an approach for inspections.

Ideally, the evaluation and any samples collected should occur within the first 30 minutes of discharge to reflect the first flush or maximum pollutant load.

Typical practice is to prepare for a wet weather inspection event when weather forecasts show a 40% chance of rain or greater. If the inspector intends to collect analytical samples, coordination with the laboratory for bottleware and for sample drop-off needs to occur in advance.

Visual Condition Assessment

The attached Wet Weather Outfall Inspection Survey should be used to document observations related to the quality of stormwater conveyed by the structure. Observations such as the following can indicate sources of pollution within the storm drain system:

- Oil sheen
- Discoloration
- Trash and debris

For any visual observation of pollution in a stormwater outfall discharge, an investigation into the pollution source should occur, but the following are often true:

1. Foam: indicator of upstream vehicle washing activities, or an illicit discharge.
2. Oil sheen: result of a leak or spill.

3. Cloudiness: indicator of suspended solids such as dust, ash, powdered chemicals and ground up materials.
4. Color or odor: Indicator of raw materials, chemicals, or sewage.
5. Excessive sediment: indicator of disturbed earth of other unpaved areas lacking adequate erosion control measures.
6. Sanitary waste and optical enhancers (fluorescent dyes added to laundry detergent): indicators of illicit discharge.
7. Orange staining: indicator of high mineral concentrations.

Many of these observations are indicators of an illicit discharge. Examples of illicit discharges include: cross-connections of sewer services to engineered storm drain systems; leaking septic systems; intentional discharge of pollutants to catch basins; combined sewer overflows; connected floor drains; and sump pumps connected to the system (under some circumstances). Additional guidelines for illicit discharge investigations are included in SOP 10, “Locating Illicit Discharges”.

Although many of the observations are indicators of illicit discharge it should be noted that several of these indicators may also occur naturally. Orange staining may be the result of naturally occurring iron, and thus unrelated to pollution. Foam can be formed when the physical characteristics of water are altered by the presence of organic materials. Foam is typically found in waters with high organic content such as bog lakes, streams that originate from bog lakes, productive lakes, wetlands, or woody areas. To determine the difference between natural foam and foam cause by pollution, consider the following:

1. Wind direction or turbulence: natural foam occurrences on the beach coincide with onshore winds. Often, foam can be found along a shoreline and/or on open waters during windy days. Natural occurrences in rivers can be found downstream of a turbulent site.
2. Proximity to a potential pollution source: some entities including the textile industry, paper production facilities, oil industries, and fire fighting activities work with materials that cause foaming in water. If these materials are released to a water body in large quantities, they can cause foaming. Also, the presence of silt in water, such as from a construction site can cause foam.
3. Feeling: natural foam is typically persistent, light, not slimy to the touch.
4. Presence of decomposing plants or organic material in the water.

Both bacteria and petroleum can create a sheen on the water surface. The source of the sheen can be differentiated by disturbing it, such as with a pole. A sheen caused by oil will remain intact and move in a swirl pattern; a sheen caused by bacteria will separate and appear “blocky”. Bacterial or naturally occurring sheens are usually silver or relatively dull in color and will break up into a number of small patches of sheen. The cause may be presence of iron, decomposition of organic material or presence of certain bacteria. Bacterial sheen is not a pollutant but should be noted.

Optical enhancers, fluorescent dyes added to laundry detergent, are typically detected through the use of clean, white cotton pads placed within the discharge for several days, dried then viewed under a UV light. If the cotton pad displays fluorescent patches, optical enhancers are present. Optical enhancers are occasionally visible as a bluish-purple haze on the water surface; however the testing method should be used to confirm the presence of optical enhancers.

The Wet Weather Outfall Inspection Survey includes fields where these and other specific observations can be noted. The inspector shall indicate the presence of a specific water quality indicator or parameter by marking “Yes”. If “Yes” is marked, provide additional details in the comments section. If the indicator in question is not present mark “No”.

Within the comments section, provide additional information with regard to recorded precipitation totals, or more detailed descriptions of observations made during the inspection and corrective actions taken.

Measuring Water Quality

Based on the results of the Visual Condition Assessment, it may be necessary to collect additional data about water quality. Water quality samples can be in the form of screening using field test kits or by discrete analytical samples processed by a laboratory.

Information on how to use field test kits is included in SOP 13, “Water Quality Screening with Field Test Kits”, and the Wet Weather Outfall Inspection Survey includes fields to document the results of such screening. The Inspection Survey also provides values for what can be considered an appropriate benchmark for a variety of parameters that can be evaluated with field test kits.

If the results of screening using field test kits indicate that the outfall’s water quality exceeds the benchmarks provided, collection of discrete analytical samples should be considered.

Analytical Sample Collection

Sample collection methods may vary based on specific outfall limitations but shall follow test procedures outlined in 40 CFR 136. A discrete manual or grab sample can classify water at a distinct point in time. These samples are easily collected and used primarily when the water quality of the discharge is expected to be homogeneous, or unchanging, in nature. A flow-weighted composite sample will classify water quality over a measured period of time. These samples are used when the water quality of the discharge is expected to be heterogeneous, or fluctuating, in nature. Grab samples are more common for wet weather outfall inspections due to the time-sensitive nature of the process.

Protocols for collecting a grab sample shall include the following:

1. Do not eat, drink or smoke during sample collection and processing.
2. Do not collect or process samples near a running vehicle.
3. Do not park vehicles in the immediate sample collection area, including both running and non-running vehicles.
4. Always wear clean, powder-free nitrile gloves when handling sample containers and lids.
5. Never touch the inside surface of a sample container or lid, even with gloved hands.
6. Never allow the inner surface of a sample container or lid to be contacted by any material other than the sample water.
7. Collect samples while facing upstream and so as not to disturb water or sediments in the outfall pipe or ditch.

8. Do not overfill sample containers, and do not dump out any liquid in them. Liquids are often added to sample containers intentionally by the analytical laboratory as a preservative or for pH adjustment.
9. Slowly lower the bottle into the water to avoid bottom disturbance and stirring up sediment.
10. Do not allow any object or material to fall into or contact the collected water sample.
11. Do not allow rainwater to drip from rain gear or other surfaces into sample containers.
12. Replace and tighten sample container lids immediately after sample collection.
13. Accurately label the sample with the time and location.
14. Document on the Wet Weather Outfall Inspection Survey that analytical samples were collected, specify parameters, and note the sample time on the Inspection Survey. This creates a reference point for samples.

Analytical Sample Quality Control and Assurance

Upon completion of successful sample collection, the samples must be sent or delivered to a MassDEP-approved laboratory for analytical testing. Quality control and assurance are important to ensuring accurate analytical test results.

Sample preservation is required to prevent contaminant degradation between sampling and analysis and should be completed in accordance with 40 CFR 136.3.

Maximum acceptable holding times are also specified for each analytical method in 40 CFR 136.3. Holding time is defined as the period of time between sample collection and extraction for analysis of the sample at the laboratory. Holding time is important because prompt laboratory analysis allows the laboratory to review the data and if analytical problems are found, re-analyze the affected samples within the holding times.

Chain of custody forms are designed to provide sample submittal information and document transfers of sample custody. The forms are typically provided by the laboratory and must be completed by the field sampling personnel for each sample submitted to the lab for analysis. The document must be signed by both the person releasing the sample and the person receiving the sample every time the sample changes hands. The sampling personnel shall keep one copy of the form and send the remaining copies to the laboratory with the samples. Custody seals, which are dated, signed and affixed to the sample container, may be used if the samples are shipped in a cooler via courier or commercial overnight shipping.

Attachments

1. Wet Weather Outfall Inspection Survey

Related Standard Operating Procedures

1. Dry Weather Outfall Inspection
2. Locating Illicit Discharges
3. Water Quality Screening in the Field

Appendix E

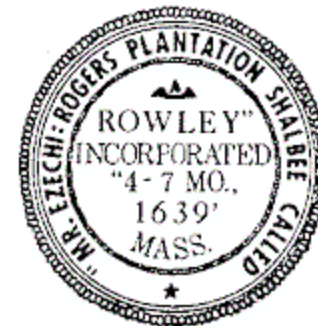
IDDE Employee Training Record

**Illicit Discharge Detection and Elimination (IDDE)
Employee Training Record**

Rowley, Massachusetts

Date of Training: June 26, 2019

Duration of Training: 9:00 - 11:30 AM



Name	Title	Signature
Brent Baeslack	Conservation Agent	<i>Brent Baeslack</i>

Appendix F

Source Isolation and Confirmation Methods: Instructions, Manuals, and SOPs

LOCATING ILLICIT DISCHARGES

Introduction

An “illicit discharge” is any discharge to an engineered storm drain system that is not composed entirely of stormwater unless the discharge is defined as an allowable non-stormwater discharge under the 2003 Massachusetts MS4 Permit. Illicit discharges may enter the engineered storm drain system through direct or indirect connections, such as: cross-connections of sewer services to engineered storm drain systems; leaking septic systems; intentional discharge of pollutants to catch basins; combined sewer overflows; connected floor drains; and sump pumps connected to the system (under some circumstances). Illicit discharges can contribute high levels of pollutants, such as heavy metals, toxics, oil, grease, solvents, nutrients, and pathogens to receiving streams.

Illicit discharges can be located by several methods, including routine dry weather outfall inspections and catch basin inspections, which are described in detail in SOP “Dry Weather Outfall Inspection” and SOP “Catch Basin Inspection and Cleaning”, respectively, as well as from citizen reports.

This SOP assumes that the municipality has legal authority (i.e., a bylaw or ordinance) in place, per the requirements of the 2003 Massachusetts MS4 Permit, to prohibit the connection of non-stormwater discharges into the storm drain system. The authority or department for addressing illicit discharge reports would be clearly identified in the municipality’s legal authority. In Massachusetts, this is typically a combination of the Board of Health, Highway Department, and the local sanitary sewer department or commission. In some communities, the Conservation Commission may also play a role. This SOP refers to “appropriate authority” generically to reflect differences in how municipalities have identified these roles.

Identifying Illicit Discharges

The following are often indicators of an illicit discharge from stormwater outfall:

1. Foam: indicator of upstream vehicle washing activities, or an illicit discharge.
2. Oil sheen: result of a leak or spill.
3. Cloudiness: indicator of suspended solids such as dust, ash, powdered chemicals and ground up materials.
4. Color or odor: Indicator of raw materials, chemicals, or sewage.
5. Excessive sediment: indicator of disturbed earth of other unpaved areas lacking adequate erosion control measures.
6. Sanitary waste and optical enhancers (fluorescent dyes added to laundry detergent): indicator of the cross-connection of a sewer service.
7. Orange staining: indicator of high mineral concentrations.

Both bacteria and petroleum can create a sheen on the water surface. The source of the sheen can be differentiated by disturbing it, such as with a pole. A sheen caused by oil will remain intact and move in a swirl pattern; a sheen caused by bacteria will separate and appear “blocky”. Bacterial sheen is not a pollutant but should be noted.

Citizen Call in Reports

Reports by residents and other users of a water body can be effective tools in identifying the presence of illicit discharges. Many communities have set up phone hotlines for this purpose, or have provided guidance to local police departments and dispatch centers to manage data reported in this manner. Municipal employees and the general public should receive education to help identify the signs of illicit discharges and should be informed how to report such incidents.

When a call is received about a suspected illicit discharge, the attached IDDE Incident Tracking Sheet shall be used to document appropriate information. Subsequent steps for taking action to trace, document, and eliminate the illicit discharge are described in the following sections.

Potential illicit discharges reported by citizens should be reviewed on an annual basis to locate patterns of illicit discharges, identify high-priority catchments, and evaluate the call-in inspection program.

Tracing Illicit Discharges

Whenever an illicit discharge is suspected, regardless of how it was identified, the attached IDDE Incident Tracking Sheet should be utilized. The Incident Tracking Sheet shall be provided to the appropriate authority (i.e., Board of Health, Department of Public Works, etc.), which shall promptly investigate the reported incident.

If the presence of an illicit discharge is confirmed by the authority, but its source is unidentified, additional procedures to determine the source of the illicit discharge should be completed.

1. Review and consider information collected when illicit discharge was initially identified, for example, the time of day and the weather conditions for the previous 72 hours. Also consider and review past reports or investigations of similar illicit discharges in the area.
2. Obtain storm drain mapping for the area of the reported illicit discharge. If possible, use a tracking system that can be linked to your system map, such as GIS.
3. Document current conditions at the location of the observed illicit discharge point, including odors, water appearance, estimated flow, presence of floatables, and other pertinent information. Photograph relevant evidence.
4. If there continues to be evidence of the illicit discharge, collect water quality data using the methods described in SOP “Water Quality Screening in the Field”. This may include using field test kits or instrumentation, or collecting analytical samples for full laboratory analysis.
5. Move upstream from the point of observation to identify the source of the discharge, using the system mapping to determine infrastructure, tributary pipes, and drainage areas that contribute. At each point, survey the general area and surrounding properties to identify potential sources of the illicit discharge. Document observations at each point on the IDDE Incident Tracking Sheet as well as with photographs.
6. Continue this process until the illicit discharge is no longer observed, which will define the boundaries of the likely source. For example if the illicit discharge is present in catch basin 137 but not the next upstream catch basin, 138, the source of the illicit discharge is between these two structures.

If the source of the illicit discharge could not be determined by this survey, consider using dye testing, smoke testing, or closed-circuit television inspection (CCTV) to locate the illicit discharge.

Dye Testing

Dye testing is used to confirm a suspected illicit connection to a storm drain system. Prior to testing, permission to access the site should be obtained. Dye is discharged into the suspected fixture, and nearby storm drain structures and sanitary sewer manholes observed for presence of the dye. Each fixture, such as sinks, toilets, and sump pumps, should be tested separately. A third-party contractor may be required to perform this testing activity.

Smoke Testing

Smoke testing is a useful method of locating the source of illicit discharges when there is no obvious potential source. Smoke testing is an appropriate tracing technique for short sections of pipe and for pipes with small diameters. Smoke added to the storm drain system will emerge in connected locations. A third-party contractor may be required to perform this testing activity.

Closed Circuit Television Inspection (CCTV)

Televised video inspection can be used to locate illicit connections and infiltration from sanitary sewers. In CCTV, cameras are used to record the interior of the storm drain pipes. They can be manually pushed with a stiff cable or guided remotely on treads or wheels. A third-party contractor may be required to perform this testing activity.

If the source is located, follow steps for removing the illicit discharge. Document repairs, new sanitary sewer connections, and other corrective actions required to accomplish this objective. If the source still cannot be located, add the pipe segment to a future inspection program.

This process is demonstrated visually on the last page of this SOP.

Removing Illicit Discharges

Proper removal of an illicit discharge will ensure it does not recur. Refer to Table SOP 10-1, attached for, for examples of the notification process.

In any scenario, conduct a follow up inspection to confirm that the illicit discharge has been removed. Suspend access to the storm drain system if an “imminent and substantial danger” exists or if there is a threat of serious physical harm to humans or the environment.

Attachments

1. Illicit Discharge Incident Tracking Sheet

Related Standard Operating Procedures

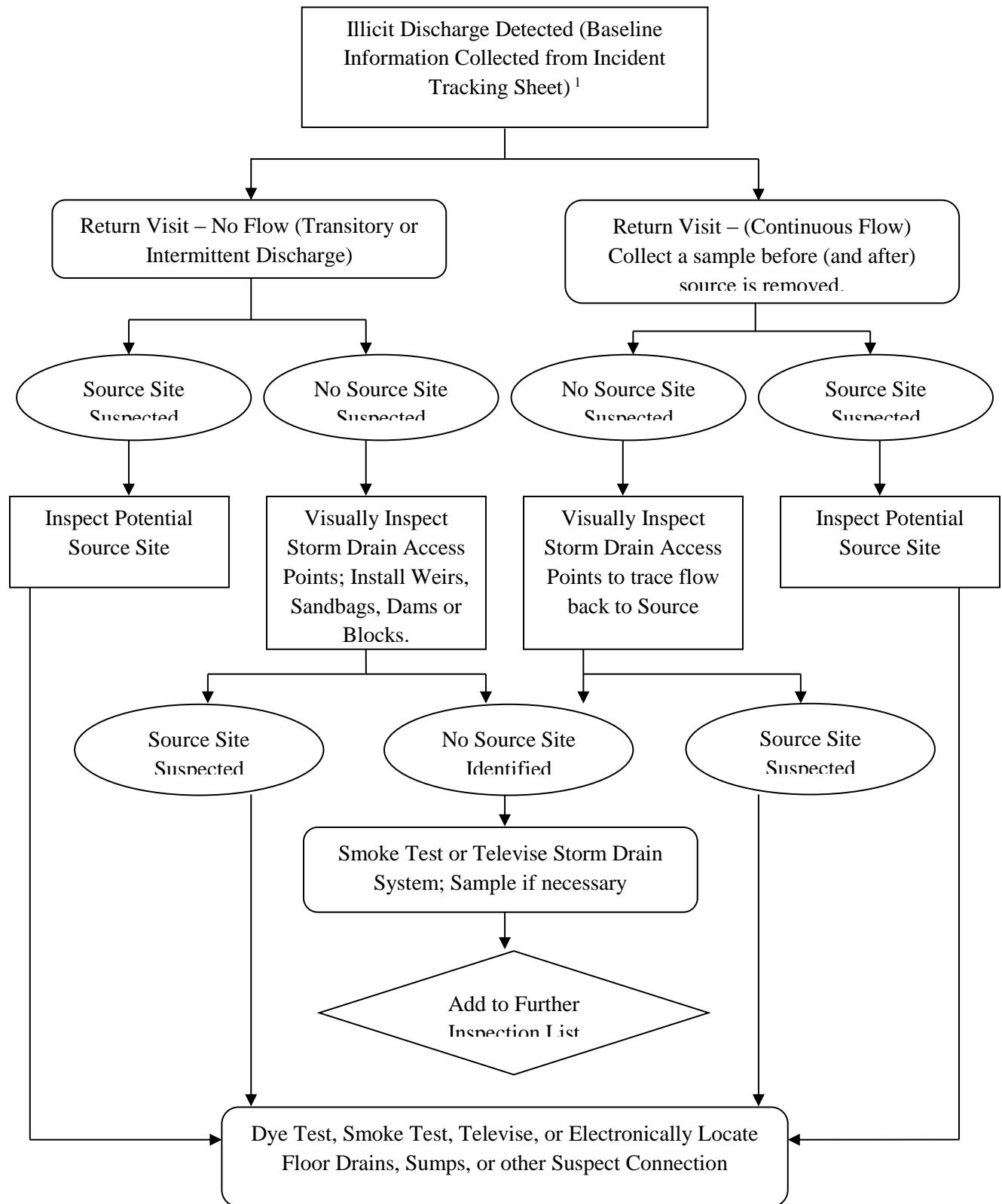
1. SOP Dry Weather Outfall Inspection

2. SOP Wet Weather Outfall Inspection
3. SOP Catch Basin Inspection
4. SOP Using Field Test Kits For Outfall Screening
5. SOP Private Drainage Connections

Table SOP 10-1

**Notification and Removal Procedures for Illicit Discharges
into the Municipal Separate Storm Sewer System**

Financially Responsible	Source Identified	Enforcement Authority	Procedure to Follow
Private Property Owner	One-time illicit discharge (e.g. spill, dumping, etc.)	Ordinance enforcement authority (e.g. Code Enforcement Officer)	<ul style="list-style-type: none"> • Contact Owner • Issue Notice of Violation • Issue fine
Private Property Owner	Intermittent or continuous illicit discharge from legal connection	Ordinance enforcement authority (e.g. Code Enforcement Officer)	<ul style="list-style-type: none"> • Contact Owner • Issue Notice of Violation • Determine schedule for removal • Confirm removal
Private Property Owner	Intermittent or continuous illicit discharge from illegal connection or indirect (e.g. infiltration or failed septic)	Plumbing Inspector or ordinance enforcement authority	<ul style="list-style-type: none"> • Notify plumbing inspector
Municipal	Intermittent or continuous illicit discharge from illegal connection or indirect (e.g. failed sewer line)	Ordinance enforcement authority (e.g. Code Enforcement Officer)	<ul style="list-style-type: none"> • Issue work order • Schedule removal • Remove connection • Confirm removal
Exempt 3 rd Party	Any	USEPA	<ul style="list-style-type: none"> • Notify exempt third party and USEPA of illicit discharge



¹ – *Guidelines and Standard Operating Procedures: Illicit Discharge Detection and Elimination and Pollution Prevention/Good Housekeeping for Stormwater Phase II Communities in New Hampshire*, New Hampshire Estuary Project, 2006, p. 25, Figure 2-1.

PRIVATE DRAINAGE CONNECTIONS

Introduction

The 2003 Massachusetts MS4 Permit described a number of non-stormwater discharges to the engineered storm drain system that are considered “allowable”, as long as an individual community has not prohibited the discharge. Allowable non-stormwater discharges to the storm drain system can include the following, per Page 8 of the 2003 Massachusetts MS4 Permit (not inclusive):

- Diverted stream flows;
- Uncontaminated groundwater infiltration (as defined at 40 CFR 35.2005(20));
- Uncontaminated pumped groundwater;
- Foundation drains;
- Water from crawl space pumps;
- Footing drains; and
- Flows from riparian habitats and wetlands.

The municipalities regulated under the 2003 Massachusetts MS4 Permit have approved connection of the above sources to engineered storm drain systems in a variety of ways, ranging from full acceptance to full prohibition of discharges from these sources.

This Standard Operating Procedure intends to provide guidance to the municipalities on how to evaluate non-stormwater discharges to the engineered storm drain system from private connections such as foundation drains (also referred to as perimeter drains), footing drains (similar to foundation drains), non-pumped groundwater infiltration, and other private non-stormwater discharges. Discharges from sump pumps or other pumped groundwater sources are being addressed by a separate Sump Pump Discharge Policy, and are not covered by this Standard Operating Procedure.

Applicability of Private Drainage Connections

Connections of private drainage to the municipal storm drain system generate two primary concerns. The first concern is the potential for pollution from the connection, such as if subsurface contamination or septic system waste is conveyed via drainage from a foundation drain to the stormwater outfall. The second concern is that system capacity can be reduced because of pipe space occupied by flow from private sources. This results in a decreased capacity for the system to convey stormwater during wet weather events, increasing pipe surcharging and the potential for localized street flooding.

For both of these reasons, this SOP is not intended to encourage connections of private drainage to the engineered storm drain system. Instead, this SOP is to be used as guidance for connecting private drainage in scenarios where property damage may result, where discharge of water to the ground surface would result in a public hazard or nuisance, and where there is no other reasonable alternative for discharge of stormwater from the private property.

The connection of private drainage cannot be used for the discharge of non-stormwater from the site.

Requirements for Connection of Private Drainage

A community may consider connection of private drainage to the engineered storm drain system if all of the following conditions are met.

1. The owner of the private drainage (hereafter referred to as the applicant) accepts responsibility for securing all other permits or approvals for the completion of the work, including any right-of-way process required by the municipality.
2. The applicant agrees to submit plans for review by the municipality, showing the location of all proposed work.
3. The applicant agrees to pay for all costs associated with the completion of the work, including but not limited to the costs of land survey, legal reviews, testing, permitting, construction, engineering design, and traffic control.
4. The applicant agrees to compensate the municipality for the time of its Town Engineer, Code Enforcement Officer, water department (or quasi-municipal water district), consulting engineer, and/or other official, as required, for their review of the proposed connection plans.
5. The applicant agrees to perform flow metering to determine the volume of discharge that would enter the municipal system from the property.
6. The applicant agrees to have dye and/or smoke testing performed to confirm that no prohibited fixtures would be connected to the municipal system from the property (i.e., to document that the connection would not represent an illicit discharge).
7. The applicant agrees to use the same materials specified by the municipality for construction of the system, and provide a materials list to the municipality for review and approval in advance of construction. If any pump is to be utilized to convey the drainage, cut sheets on the selected pump shall be provided to the municipality for review and approval in advance of construction.
8. The applicant's contractor agrees to secure all road opening permits, drainlayer permits, and other construction permits as required by the municipality.
9. The applicant's discharge is in close proximity to the municipal system, for example, within 300 linear feet, and the connection to the municipal system can be completed without impacting other private property or municipal infrastructure and without significant impact to aboveground assets. Aboveground assets may include trees, fences, stone walls, utility poles, gardens, signs, or other semi-permanent features.
10. The applicant agrees to execute a covenant for the property to reflect the drainage connection, and record this covenant with the Registry of Deeds for the property.
11. The applicant agrees to install a backflow preventer, cleanout, and a shutoff device in such places that all fittings are accessible to the municipality.
12. The applicant agrees to install an oil/water separator, if required by the municipality, and provide documentation of maintenance of this device.
13. The applicant agrees to complete confirmation analytical testing of the discharge, with pollutants and laboratory specified by the municipality. This testing may occur during the initial evaluation phase, and may be required annually or on some other frequency to demonstrate ongoing compliance.

14. The applicant agrees to provide record drawings to the municipality documenting the location of the discharge, with ties to permanent structures.
15. The applicant agrees to pay any annual review or inspection fees associated with the discharge.

Right of Refusal for New Connections of Private Drainage

The municipality shall reserve the right to refuse connection of the private drainage to the engineered storm drain system if any of the following can be demonstrated:

1. The municipal system does not have adequate capacity to manage proposed flow from the connection.
2. The private drainage includes flow from municipal users or sources.
3. The stormwater outfall that manages flow from the applicant's property discharges to a water body identified as impaired in the most current version of the Integrated List of Waters (i.e., the 303(d) list) or is subject to stringent local controls.
4. The connection would be located within 100 linear feet of a subsurface wastewater disposal system (i.e., septic system).
5. The connection would be located within a public drinking water supply Zone I.
6. The connection would be located within a public drinking water supply Zone II, and the municipality's water department (or quasi-municipal water district) has not approved of the connection in writing.
7. Flow conveyed by the discharge would create a safety hazard such as ponding or freezing to vehicular, pedestrian, bicycle or other transportation, or would create erosion or the potential for erosion.
8. The connection jeopardizes public health, safety, or natural resources.
9. The the connection fails to meet the terms and conditions of this SOP.

Existing Connections of Private Drainage

Existing private connections are considered to be a grandfathered, as long as they are used only for discharge of non-stormwater discharges allowed by the 2003 Massachusetts MS4 Permit. Any modification made to any grandfathered connection shall be subject to the conditions in this SOP.

The municipality may revoke grandfathered approval if the municipality determines that any of the nine conditions under "Right of Refusal for New Connections of Private Drainage" become applicable.