



STORMWATER MANAGEMENT PROGRAM ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAM

Plymouth Township

Montgomery County, Pennsylvania

700 Belvoir Rd,
Plymouth Meeting, PA 19462

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photo source: Township Facebook page

CENTER FOR
**WATERSHED
PROTECTION**

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APPENDICES

APPENDIX A – Pennsylvania DEP MS4 Outfall Field Screening Report

1. Introduction

Plymouth Township, Pennsylvania (the Township) is regulated under a National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4) (Permit No. PAG130008, effective March 16, 2018). The Township is required to develop and implement an Illicit Discharge Detection and Elimination (IDDE) program. The MS4 permit requires a Stormwater Management Program (SWMP) to “*reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act and Pennsylvania Clean Streams Law*”. The SWMP consists of six Minimum Control Measures (MCMs). This document is a written plan for MCM#3 IDDE and provides information to develop, implement and enforce a program to detect and eliminate illicit discharges into the Township’s regulated MS4.

An illicit discharge is defined in the MS4 permit as “*Any discharge to a municipal separate storm sewer that is not composed entirely of stormwater*”. Illicit discharges can occur through storm sewer cross connections to the sanitary sewer system, broken sanitary sewer pipes, wash water discharges to the local waterbody and a single event of dumping substances directly into the storm sewer system. Examples include dumping of household hazardous waste, motor vehicle fluids, industrial or restaurant waste into the MS4 system. The MS4 permit authorizes non-stormwater discharges if it does not cause or contribute to pollution that includes:

- Discharges or flows from firefighting activities.
- Discharges from potable water sources from water line flushing and fire hydrant flushing, if they don’t have detectable concentrations of Total Residual Chlorine (TRC).
- Non-contaminated irrigation water, water from lawn maintenance, landscape drainage and flows from riparian habitats and wetlands.
- Diverted stream flows and springs.
- Non-contaminated pumped groundwater and water from foundation and footing drains and crawl space pumps.
- Non-contaminated heating, ventilation and air conditioning (HVAC) condensation and water from geothermal systems.
- Residential vehicle wash water where cleaning agents are not utilized.
- Non-contaminated hydrostatic test water discharges, if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).

2. Outfall IDDE Procedures

2.1 Procedures for Outfall Prioritization

The MS4 permit requires identification of priority outfalls defined as having a higher likelihood of illicit discharges, illicit connections, or illegal dumping. Priority outfalls can be identified using a Geographic Information System (GIS) that allows for analysis of spatial data (i.e. land use, storm drain outfalls) and incorporating data from other sources (i.e. citizen complaints). This analysis will vary based on available data and characteristics of the Township. Table 1 provides a list of suggested data to use for the analysis. A scoring system is developed for each data type and aggregated to identify locations within the Township with a higher likelihood of illicit discharges. Priority outfalls should be screened annually during each year of MS4 permit coverage.

Table 1. Data Types for Potential Use for Identification of Priority Outfalls.

Data Type	Data Description
Age of developments	Older developments have a higher likelihood of potential illicit discharges. As pipes and connections are upgraded over time cross connections between sanitary sewer and storm drain lines can occur.
Stormwater outfall density	The higher number of outfalls per stream-mile indicates a higher likelihood of potential illicit discharges.
Poor dry weather water quality	Use existing dry weather water quality monitoring data to indicate locations with high levels of pollutants.
Condition/age of infrastructure	Aging and failing sewer infrastructure indicates a higher likelihood of potential illicit discharges. Useful resources include sewer maps, inflow and infiltration studies, or knowledge from local staff that repair sewer pipes.
Citizen pollution complaints	Review past citizen complaints or historical illicit discharges to identify locations with a higher density of problems. These areas indicate a higher likelihood of potential illicit discharges.
Generating Sites ¹	Land use or zoning data is useful to locate commercial, industrial, institutional, municipal and transport-related sites. The greater density of sites indicates a higher likelihood of potential illicit discharges.

¹ Generating Sites are defined as land uses with a greater likelihood of producing pollutants. Examples include construction sites, restaurants, and industrial activities (Wright et al., 2005).
<https://owl.cwp.org/mdocs-posts/urban-subwatershed-restoration-manual-series-manual-11/>

2.2 Procedures for Screening Outfalls

The Township is required to conduct screening of all regulated small MS4 outfalls during dry weather once within the 5-year NPDES MS4 permit term and screen priority outfalls annually. Outfall screening should only occur after 48 consecutive hours of dry weather or no precipitation that produces stormwater runoff. The MS4 permit (MCM #3, BMP #2 and #3) requires the Township to develop and maintain map(s) that includes the boundaries of the Township, Urban Areas, location of all outfalls, the entire storm sewer collection system owned by the permittee (i.e. roads, inlets, etc.) and the location and names of surface waters that receive discharges from those outfalls. The Township developed this mapping during the first permit cycle. Observation points can be established if an MS4 outfall cannot be accessed due to safety, access to private property concerns, or other reasons. An observation point is established at a location prior to the outfall location (i.e. catch basin draining to an outfall) and is where the field screening should be performed. The Township does not currently have any observation points.

2.2.1 Preparation for Field Work

The ideal season for outfall screening is fall as the groundwater level is low and finding outfalls is easier due to less vegetative growth. Field crews should conduct outfall screening in pairs for safety and efficiency using the MS4 stormwater outfall maps that show the locations of outfalls (and observation points if applicable). Basic field equipment recommended for outfall screening includes waders, a measuring tape, camera (or smartphone/tablet), sample bottle(s), and water quality testing materials. In addition, safety gear is important including a first aid kit, flashlight and a survey vest. It is essential to bring field maps that include road names, streams, and the stormwater outfall system. These can be paper maps and/or web applications for use on tablets or smartphones.

2.2.2 Outfall screening procedure

At each outfall, field crews should document information using the [Pennsylvania Department of Environmental Protection MS4 Outfall Field Screening Report](#) (the Form) either on paper (Appendix A) or electronically through the Township's Survey123 Forms which are associated with an interactive ArcGIS Online web map application. Each outfall is assessed by filling out the applicable sections of the Form that includes Background Information, Outfall Description, Dry Weather Flow Evaluation, Field/Laboratory Analysis, Illicit Discharges, and Responsible Official Certification. Additionally, while conducting the outfall screening, field crews should assess if the outfalls and related infrastructure is functioning properly or in need of repair. Infrastructure repairs may include broken pipes or outfalls, clogged and/or rusted pipes,

and erosion around the pipe or headwall leading to potential failure. Instructions for filling out each of the six sections in the Form are discussed in the next sections.

2.2.2.1 Background Information

This section of the Form is used to create a record of the location, staff involved and general conditions for the outfall assessment. Most of the information can be filled out prior to field work except for photographs of the outfall. The maps of the MS4 stormwater outfall system are used to identify each outfall location. If using an electronic version of the Form on a tablet or smartphone, after the first field visit, the background information can be pre-populated, and photographs taken directly on the tablet or smartphone.

2.2.2.2 Outfall Description

This section of the Form is used to record general outfall characteristics including type of pipe, material, shape, dimensions, and if the pipe is submerged in water and/or sediment. Figure 1 provides a visual overview of this section of the Form. Once the outfall description is complete, an important part of this section is to identify if dry weather flow is present at the outfall. If dry weather flow is present at the outfall, note the flow rate description that best fits. If dry weather flow is not present at the outfall, the next three sections can be skipped and responsible official certification completed.

Outfall Description				
Pipe Type		In-Stream?		
Open	Closed	No	Yes	
				
Shape of Pipe				
Circular	Box	Elliptical	Channel	Earthen Swale
				
Submerged in Water				
No	Partially	Fully		
				
Submerged with Sediment				
No	Partially	Fully		
				

Figure 1. Visual reference to fill out the outfall description section of the Form.

2.2.2.3 Dry Weather Flow Evaluation

In this section of the Form, dry weather flow from the outfall is assessed for evidence of past illicit discharges using physical and visual indicators. Indicators identified on the Form include the presence of color, odor, observed change in the receiving waters, floating solids, scum, sheen or deposits. Additional indicators of illicit discharges include

excessive plant growth, outfall damage, deposits/stains, and/or benthic growth on pipe surfaces (CWP 2004). These physical and visual indicators provide clues that a discharge has occurred in the past, even if the pipe is not currently flowing and should be documented on the Form. Several visual indicators of an illicit discharge are shown in Figure 2.

Indicators of Illicit Discharges at Outfalls	
Excessive plant growth at outfall	Colored, turbid water
	
White, milky colored discharge at outfall	Discharge of solids from outfall
	

Figure 2. Indicators of illicit discharges at outfalls.

Some illicit discharges are easy to detect by visual indicators such as sewage that has a strong odor and presence of solids (e.g. raw sewage or toilet paper). When an obvious illicit discharge is observed, sampling is not required and it should be investigated immediately to eliminate the source of the discharge. If the source of the dry weather discharge isn't easily detected, a water quality sample should be taken for analysis to determine if pollutants are present and to help identify the source of the discharge.

2.2.2.4 Field/Laboratory Analysis

If dry weather flow is present at the outfall and/or color, odor, solids or other visual indicators are present, a water quality sample should be taken with the goal of identifying if pollutants are present. If the outfall has dry weather flow with no

pollutants present, it is not considered an illicit discharge. It is a discharge that may be from natural sources such as groundwater.

This section of the Form is used to record results from water quality analysis. The Form contains many possible water quality parameters to determine if a dry weather flow is illicit. A review of chemical indicator parameters to identify illicit discharges is provided in CWP, 2004. Three main parameters; ammonia, detergents and chloride, are recommended to distinguish between four common dry weather discharge types; sewage, wash water, potable water, and groundwater. Ammonia is used to distinguish sewage, chloride is used to identify potable water, surfactants is used to identify wash water, and the absence of visual indicators and absence of high levels of pollutants is used to identify potential natural sources such as springs and groundwater flow.

During an initial water quality field screening, disposable test strips or test kits or probes, can be used as an indicator of the discharge source. If the initial field screening testing results indicate a high level of a pollutant present, then a sample should be taken and sent to a laboratory certified by the PA Department of Environmental Protection (PA DEP) for more accurate water quality testing. The recommended water quality parameters are provided in Table 2 (CWP, 2004).

Table 2. Overview of Recommended Water Quality Sampling Parameters.

Sampling Parameter	Pollutant Detected	Detection Level (mg/l)	Testing Challenges
Ammonia-Nitrogen	Sewage and liquid waste from some industrial sites	>1mg/L indicator of sewage contamination	Available as a test strip
Chlorine	Tap Water (water line break), swimming pool discharge, or industrial from a chlorine bleaching process	High levels are detected	Available as test strip and is highly volatile. Chlorine is used to disinfect tap water.
Detergents	Wash water	None	Field sampling kit has a reagent that is hazardous waste; it is safer to test in a laboratory; not available as a test strip
pH	Liquid wastes from industries; residential wash water	Very high or low pH (3-12) is indicator of industrial, residential wash water is basic (pH 8 or 9)	Should be combined with other parameters to confirm pollutant

The Township should coordinate with a local DEP-certified laboratory for future water quality sampling of potential dry weather outfall field screenings. The laboratory will provide quality assurance and quality control procedures to follow for collecting, transporting and analyzing water samples as well as sterile bottles to collect samples. Include the water quality sample results with the outfall inspection report and keep a record to include in the Annual Report.

2.2.2.5 Illicit Discharges

This section of the Form is used to document actions taken to identify the source of the illicit discharge and corrective actions taken to eliminate the illicit discharge. This section is only applicable if a dry weather flow is determined to be an illicit discharge using information from the dry weather flow evaluation and field/laboratory analysis sections. The IDDE Tracking and Elimination section contains procedures to track the

illicit discharge to the source and eliminate the source from entering the storm sewer system.

2.2.2.6 Responsible Official Certification

This section of the Form certifies that the information documented in this form is accurate and evaluated for quality control. This section should be signed by the designated staff person responsible for the IDDE program.

3. Stormwater Ordinance

The MS4 permit requires adoption of a stormwater management ordinance to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the MS4 (BMP#5). Adoption of a stormwater management ordinance provides legal authority for the Township to implement and enforce an IDDE program. The ordinance includes provisions to gain access to private property for illicit discharge inspections of suspected illicit discharges, and a set of enforcement tools to respond to illicit discharges ranging from verbal warnings to civil penalties.

The Township's Stormwater Management Ordinance² enacted April 18, 2016, outlines enforcement and penalties associated with violations such as illicit discharges that include a written notice of violation and payment of fines. The Township is required to update their Stormwater Management Ordinance for consistency with the PA DEP 2022 Model Stormwater Management Ordinance per their General Permit. When the Township updates and adopts its ordinance, the new stormwater management ordinance will be included as an attachment to the next Annual MS4 Status Report during the permit term.

4. IDDE Tracking and Elimination

When an illicit discharge is identified, the Township is responsible for tracking the pollutant to the source and eliminating the source from entering the storm sewer system. Illicit discharges are identified during routine dry weather outfall screenings in addition to reports of suspected or confirmed illicit discharges provided by the public or other agencies. The first step is to track the illicit discharge to the source. Three

² <https://ecode360.com/6641273>

suggested tracking procedures include storm drain network investigations, drainage area investigation, and on-site investigation.³ A description of each is provided.

4.1 Storm Drain Network Investigations

When an illicit discharge is identified at a storm drain outfall, the existing storm drain network mapping is used to track the source of the pollution. Similar to the dry weather outfall field sampling, manholes are inspected for visual observations of illicit discharges and indicator sampling is conducted to isolate the source to a smaller segment of the storm drain network. Indicator sampling at manholes is based on the water quality testing conducted at the outfall. For example, if a high ammonia reading was identified at the outfall, then ammonia should be tested for indicator sampling at manholes.

4.2 Drainage Area Investigations

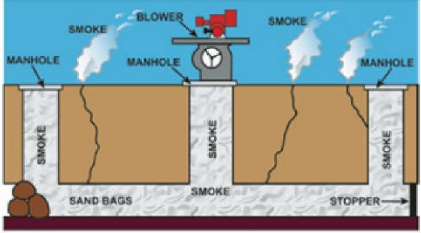
Once the indicator sampling is isolated between two manholes, the next step is to conduct drainage area investigations or on-site investigations. Drainage area investigations are a rapid drive-by windshield survey of the drainage area to identify the potential source of pollutant discharge. For example, if high levels of detergents were found at the outfall, the drainage area investigation would target commercial car washes, laundromats, and other locations that use detergents.

4.3 On-Site Investigations

On-site testing and investigation are needed to verify the specific storm drain connection generating the illicit discharge. On-site investigations include the use of dye, video or smoke testing to identify the exact source or connection producing a discharge within the storm drain network. Table 3 provides an overview of how to conduct each method and important tips to consider.

³ <https://owl.cwp.org/mdocs-posts/idde-guidance-manual/>

Table 3. On-Site Investigation Methods, Instructions and Important Tips.

On-Site Investigation Methods		
Methods	Instructions	Important Tips
1. Dye Testing 	First, put dye in the drain, fixture or manhole. Then, open the sanitary sewer manhole downgradient and check for presence of the dye. If it's not present, check at the storm drain manhole or outfall.	Notify property owners to obtain entry to property and provide a document showing legal authority. Notify other local agencies so the dye isn't mistaken for pollution.
2. Video Testing 	Guide a mobile video camera into the storm drain pipe to identify pipe damage such as cracks that allows sewage or other contaminated flows into the storm drain pipe.	Expensive if the community doesn't own the equipment. Select an appropriate camera size to fit storm drain pipe.
3. Smoke Testing 	Seal off the storm drain by plugging storm drain inlets. Next, smoke is blown through the storm drain system. Last, crews look for potential leaks indicated by the above ground escape of smoke.	Notify the public and other local agencies.

4.4 Illicit Discharge Enforcement

Dumping of substances directly into the storm sewer system can occur as a one-time event or as a repetitive occurrence. Examples include a citizen dumping paint or used car oil into the storm drain. Catching dumping occurrences is difficult because they occur infrequently. If the dumping event is witnessed, this is an opportunity to educate the citizen and use compliance actions provided in the stormwater ordinance as necessary. Compliance actions should start with voluntary compliance and education as citizens may be unaware of the existence of illicit connections. If compliance is not obtained, the Township may use enforcement actions in coordination with the Township Solicitor. Steps to pursue both enforcement actions are based on the Township's Code Appendix E Plymouth Township Stormwater Management Ordinance⁴ and summarized in Table 4. Enforcement actions should be coordinated with the Township solicitor.

Table 4. Illicit Discharge Enforcement Actions

Sec. 903 Enforcement
• Township will provide a written notification of the violation to the responsible person. • Upon notice provided by the Township, a time limit will be established for the correction of the violation. Failure to comply within the time specified may subject a violator to the penalty provisions.
Sec. 905 Penalties
• A person that violates the ordinance shall be subject to penalties that range from liens against the property to fines for each violation. Each day the violation continues is a separate offense and fines are cumulative. • The municipality may institute injunctive, mandamus or other appropriate action or proceeding at law for the enforcement of this ordinance.

The Township should report any illicit discharge to the PA DEP that would endanger users downstream or result in pollution or a danger of pollution or property damage per PA DEP's spill reporting guidance.

5. Education and Outreach

The Township is required to provide educational outreach to target audiences defined in the Public Education and Outreach Program on the identification, prevention, and elimination of illicit discharges. The methods used to educate target audiences on

⁴ <https://ecode360.com/26913965>

stormwater educational information includes posting materials on the Township website, social media pages, and printed publications including pamphlets, flyers, posters and articles in local media.

The Township is also required to establish and promote a reporting mechanism for the public to report stormwater pollution including illicit discharges. This information should be clearly visible on the Township website and include a definition and description of illicit discharges and contact numbers for 24-hour reporting. Outside regular business hours, reporting calls are directed to the police non-emergency line. The Township is required to respond to all complaints in a timely and appropriate manner and document the complaint, response, and timeline of follow-up if the complaint was successfully resolved. The Township stormwater management webpage provides the Public Works Department phone number for citizens to report dumping that includes calling the Police Department after work hours and on the weekends⁵.

⁵ <https://www.plymouthtownship.org/services/stormwater-management/>

6. Annual Goals

The Township is required to annually complete specific goals to meet the MCM #3 permit requirements. The MS4 permit requirements and minimum annual goal for compliance are provided in Table 5.

Table 5. Goals to Meet IDDE MS4 Permit Requirements

Permit Requirements	Township Minimum Compliance Goal
BMP #1 Develop, implement, and maintain a written program for IDDE.	The Township has a written program for IDDE that is reviewed annually and revised as necessary.
BMP #2 & 3 Develop and maintain maps of MS4 system.	The Township's MS4 system mapping is complete. The maps will be reviewed annually and updated as necessary.
BMP #4 Conduct dry weather screenings of MS4 outfalls to evaluate the presence of illicit discharges.	The Township is required to conduct screening of all regulated MS4 outfalls during dry weather once within the 5-year NPDES MS4 permit. The Township is required to screen all priority outfalls annually.
BMP #5 Enact a Stormwater Management Ordinance	The Township is in the process of adopting an updated ordinance consistent with the 2022 PA DEP Model Stormwater Management Ordinance, as required by their General Permit.
BMP #6 Provide educational outreach on the detection and elimination of illicit discharges	The Township will provide educational outreach to target audiences on the identification, prevention, and elimination of illicit discharges. The Township will also establish and promote a reporting mechanism for the public to report stormwater pollution including illicit discharges.

6.1 Annual Accomplishments

The Township is required to submit an Annual MS4 Status Report on the Stormwater Management Program to PA DEP by September 30th of each permit year. The Annual MS4 Status Reports should be made available to the public by request at the Township Municipal Building or on the Township website. The IDDE accomplishments will be reported each year in the Annual MS4 Status Reports.

The Township should keep internal records and photographs of all outfall field screening, reported illicit discharges, water quality testing, illicit discharge monitoring, tracking and elimination work. This information will be included in the Annual MS4 Status Report submitted to PA DEP.

7. References

Center for Watershed Protection. (2004). Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments. Ellicott City, MD.

<https://owl.cwp.org/?mdocs-file=5029>

Wright, T., Swann, C., Cappiella, K., Schueler, T. (2005). Manual 11: Unified Subwatershed and Site Reconnaissance: A User's Manual. Urban Subwatershed Restoration Manual Series. Center for Watershed Protection, Ellicott City, MD.

<https://owl.cwp.org/mdocs-posts/urban-subwatershed-restoration-manual-series-manual-11/>

APPENDIX A

Pennsylvania DEP MS4 Outfall Field Screening Report



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name:	NPDES Permit No.: PA
Date of Inspection:	Outfall ID No.:
Land Uses in Outfall Drainage Area (Select All):	Latitude: _____° _____' _____"
☐ Industrial ☐ Urban Residential	Longitude: _____° _____' _____"
☐ Commercial ☐ Suburban Residential	Dry Weather Inspection? ☐ Yes ☐ No
☐ Open Space ☐ Other:	Date of Previous Precipitation:
	Amount of Previous Precipitation: _____ in
Inspector Name(s):	Were Photographs Taken? ☐ Yes ☐ No
	Are Photographs Attached? ☐ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☐ Closed Pipe	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other	☐ Circular ☐ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: _____ in	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☐ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☐ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☐ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☐ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☐ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☐ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☐ Yes ☐ No (If Yes, No. Samples: _____)					
FIELD / LABORATORY ANALYSIS					
PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH		S.U.	COD		mg/L
Total Residual Chlorine (TRC)		mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: _____			Oil and Grease		mg/L
Other: _____			Other: _____		
Indicate the parameters above that were analyzed by a DEP-certified laboratory:					
ILLICIT DISCHARGES					
Is the dry weather flow an illicit discharge? ☐ Yes ☐ No					
If Yes, describe efforts made to determine the source(s) of the illicit discharge.					
Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.					
Inspector Comments:					
RESPONSIBLE OFFICIAL CERTIFICATION					
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).					
Responsible Official Name			Signature		
Telephone No.			Date		