

# ELIZABETH TOWNSHIP

## MS4 PROGRAM

### MCM #3 - ILLICIT DISCHARGE DETECTION & ELIMINATION PROGRAM (IDD&E)

*Revised: September 2023*

## 1.0 **INTRODUCTION**

Elizabeth Township (Township) is a covered permittee for the PAG-13 General Municipal Separate Storm Sewer System (MS4) Permit, which is issued by the Pennsylvania Department of Environmental Protection (PADEP), under Permit ID. PAG136207. Permittees under the MS4 permit are responsible for the pollutant load and stormwater runoff within the MS4's urbanized areas that are discharging to downstream storm sewers or waters of the Commonwealth. The permit consists of six (6) Minimum Control Measures (MCM) in which the MS4 permittee must satisfy. In each MCM there are best management practices (BMP) the permittee must complete to comply with the MS4 permit.

Elizabeth Township is continuously making stormwater acknowledgment a priority within the community to reduce the amount of pollution going into the impaired streams in the Township. Elizabeth Township is responsible for the pollutants in the following impaired streams:

- **Gillespie Run**
- **Fallen Timber Run**
- **Monongahela River**
- **Wylie Run**
- **Unnamed Tributaries to Youghiogheny River**

Illicit Discharges can be defined as any discharge into the storm sewer collection system or waterway that is not entirely composed of stormwater. The IDD&E Program is a requirement of MCM 3 within the MS4 permit which focuses on BMPs to help mitigate and eliminate the discharges that are illicit.

The following procedures for detecting and eliminating illicit discharges within Elizabeth Township are described below.

## 2.0 **IDD&E PROGRAM**

### 2.1 **Dry Weather Field Screening of Outfalls**

Elizabeth Township will be working with KLH Engineers, Inc. (KLH) to conduct outfall screenings which are a part of the MS4 permit requirement. Outfall screenings are to be conducted at least forty-eight (48) hours after a rainfall event during a dry weather day to

determine if any of the outfalls within the Township have dry weather flow. The Township will fill out the “MS4 Outfall Field Screening Report” form provided by PADEP for each outfall screened by utilizing ArcGIS survey123. If any outfalls have dry weather flow, samples or investigation will begin.

## **2.2 Identifying Priority Areas**

Priority areas are areas with a higher likelihood of illicit discharges, illicit connections, or illegal dumping. Elizabeth Township predicts that all the industrial areas closest to the stream will be a priority area and along with areas with old mining activities. As the Township conducts screenings, the determination of priority areas will be made accordingly.

## **2.3 Outfall Screenings in Priority Areas**

Elizabeth Township will work with KLH to conduct outfall screenings within the planning area (urbanized areas) within the permitted MS4. If any of the outfalls have dry weather flow, the outfall will be added to the investigation list for CCTV.

## **2.4 Identifying the Source of an Illicit Discharge**

The Township will reference their system map in ArcGIS and CCTV to determine the source of dry weather discharge. If the CCTV does not determine the source, sampling of the outfall will be the next step to try to determine the source of the discharge. If the lab results of the sample predict an illicit discharge, the Township will then try to repeat the steps of where the source is. For example, if there is an observation of a high pH or there is chlorine detected, the tracking will start with determining where pools are within the area. If the results show observed fecal in the water, the Township may look for ponds, sanitary laterals, etc. within the system.

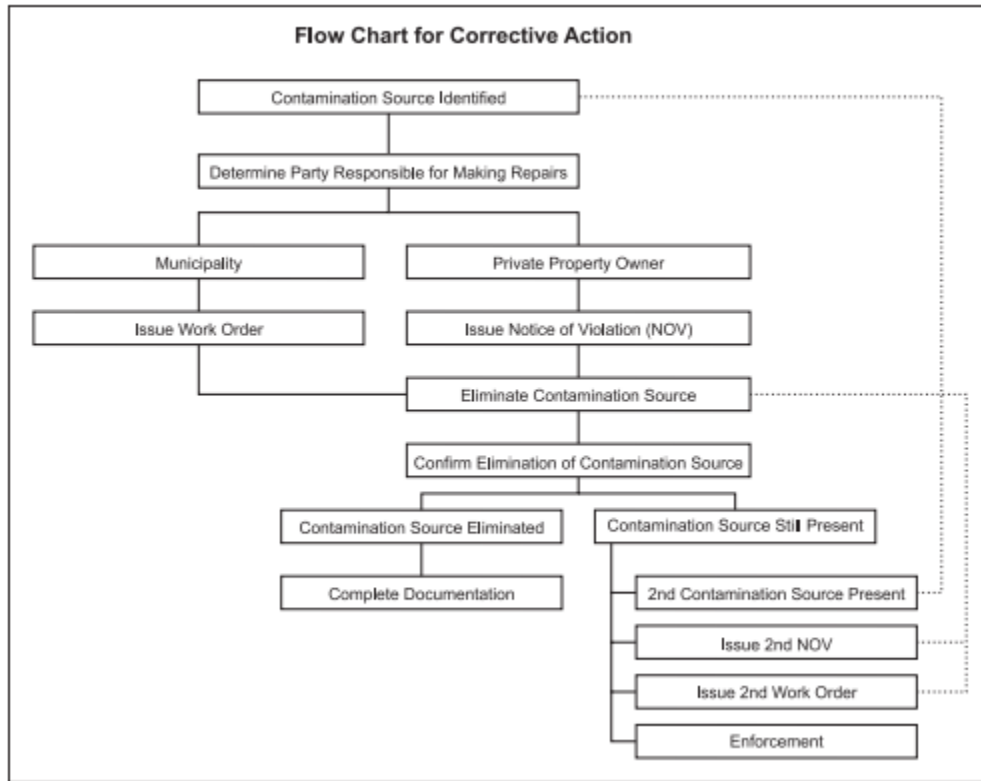
Elizabeth Township and KLH observed multiple outfalls that had dry weather flow. The Township received assistance from the Sanitary department to conduct CCTV. There were multiple outfalls that were observed to have no discharge for CCTV compared to the original date of the outfall screenings. The rest of the outfalls that had dry weather flow were determined to be coming from the Butler Golf Course and investigations are still ongoing.

## **2.5 Eliminating an Illicit Discharge**

Elizabeth Township will continue to investigate the outfall screenings with dry weather flow. Once the source is determined, the Township will notify the source to correct the issue. If there is no response from the source to correct the issue within 60 days, the Township will contact DEP for assistance on correcting the illicit discharge. If the Township finds a prohibited sanitary lateral connection to the separate sanitary, the Township will either receive assistance from the DPW or get a contractor to correct the connection to reconnect it to the existing sanitary.

The Township will also utilize EPA’s *Illicit Discharge Detection and Elimination Guidance Manual* procedures listed in Chapter 8 (Brown, Caraco, & Pitt, 2004). Please see the below

corrective actions and how to fix the illicit discharge from the previous mentioned reference.



**Table 26: Methods to Fix Illicit Discharges**

Type of Discharge	Source	Removal Action(s)
<b>Sewage</b>	Break in right-of-way	Repair by municipality
	Commercial or industrial direct connection	Enforcement
	Residential direct connection	Enforcement; Incentive or aid
	Infrequent discharge (e.g., RV dumping)	Enforcement; Spill response
	Straight pipes/septic	Enforcement; Incentive or aid
<b>Wash water</b>	Commercial or industrial direct connection	Enforcement; Incentive or aid
	Residential direct connection	Enforcement; Incentive or aid
	Power wash/car wash (commercial)	Enforcement
	Commercial wash down	Enforcement
	Residential car wash or household maintenance-related activities	Education
<b>Liquid wastes</b>	Professional oil change/car maintenance	Enforcement; Spill response
	Heating oil/solvent dumping	Enforcement; Spill response
	Homeowner oil change and other liquid waste disposal (e.g., paint)	Warning; Education; Fines
	Spill (trucking)	Spill response
	Other industrial wastes	Enforcement; Spill response

## **2.6 Assessment of the Illicit Discharges**

If any illicit discharges are found, inspections at the outfall of the illicit discharge and the known source will be conducted on a yearly basis. The Township will make assessments on any improvements and continue to sample, if needed.

## **2.7 Gaining Access to Private Property for Outfall Inspection**

Elizabeth Township will attempt to notify residents before accessing their property to conduct an outfall screening, as necessary. If there are any issues, the Township will make sure to report this on the Annual report as the outfall will be inaccessible.

## **2.8 Program Documentation, Evaluation, Assessment, and Record Keeping**

As described in the above sections, the Township will keep records of all illicit discharges found, the investigation process, elimination process, outfall screening report forms, and any other documentation associated with the illicit discharges. All MS4 documentation can be viewed by request at any time from the Township or Engineer.