

Illicit Discharge Detection and Elimination (IDDE) Plan

Town of Dennis, Massachusetts

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Prepared For:

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1 Introduction

1.1 IDDE Regulatory Background

This Illicit Discharge Detection and Elimination (IDDE) Plan has been developed by the Town of Dennis 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 MS4 Permit." The 2016 Massachusetts MS4 Permit was signed on April 4, 2016 and has an effective date of July 1, 2018. The permit was cosigned by the Massachusetts Department of Environmental Protection (MassDEP) and thus is jointly regulated by EPA and MassDEP.

The 2016 Massachusetts MS4 Permit requires that each permittee, or regulated community, address six Minimum Control Measures (MCMs). 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 MCM 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 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 municipal separate storm sewer that is not composed entirely of stormwater except non-stormwater discharges pursuant to a NPDES permit 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 a sewer service pipe to the storm drain system. Indirect illicit discharges may be more difficult to detect or address, such as a cracked pipe, leaking tank; 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 material) into catch basins, a resident or contractor illegally tapping a 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 can also be an illicit discharge if used inappropriately, such as for the disposal of floor wash water or old household products, in many cases due to a lack of understanding on the part of the homeowner.

Common illicit discharges can include the following:

- Sanitary wastewater from crushed, cracked, or collapsed pipes or from surcharges;
- Sewer lines from a house, basement, or individual bathroom to a storm drain;
- Overflow or seepage from septic tanks;
- Cross connections between a sewer or combined sewer line and the storm system;
- Commercial vehicle wash wastewater; and/or
- Improper disposal of automobile and household products.

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 dispose 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/or pathogens to surface waters. Thus, the 2016 MS4 Permit requires a program to identify, locate and remove illicit discharges.

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 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 pumped groundwater;
- Discharge from potable water sources;
- Uncontaminated ground water infiltration (as defined at 40 CFR 35.2005(20));
- Foundation drains;
- Air conditioning condensation;
- Irrigation water, springs;
- Water from crawl space pumps;
- Footing drains;
- Lawn watering;
- Individual resident car washing
- Flows from riparian habitats and wetlands;
- De-chlorinated swimming pool discharges;
- Street wash waters; and
- 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 under the IDDE Program (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

As part of the 2016 MS4 Permit, communities must implement specific actions and BMPs to address waters with an approved Total Maximum Daily Load (TMDL) as of the issuance date of the permit (April 4, 2016) and to address water quality limited waters, including but not limited to waters listed in categories 5 or 4a on the most recent EPA-approved Massachusetts Clean Water Act section 303(d) list or Massachusetts Integrated Report of water under Clean Water Act section 305(b). IDDE requirements include consideration of these waters in the prioritization of IDDE activities and sampling programs.

Table 1-1 lists the “impaired waters” within the boundaries of Dennis’s regulated area based on the Final 2014 Massachusetts Integrated List of Waters produced by MassDEP every two years¹. 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 (Based on 2014 Massachusetts Integrated List of Waters)

Waterbody Name	Segment ID and Category		Impairment(s)	Approved TMDL ²
Chase Garden Creek	MA96-35	4a	Fecal Coliform	36771 ³
Quivett Creek	MA96-09	4a	Fecal Coliform	36771
Sesuit Creek	MA96-13	4a	Fecal Coliform	36771
Bass River	MA96-12	5	Estuarine Bioassessments	
			Fecal Coliform	36771
Swan Pond River	MA96-12	5	Estuarine Bioassessments	
			Fecal Coliform	36771

Category 4a Waters – impaired waters with a completed TMDL.

Category 5 Waters – impaired waters that require a TMDL.

1.5 IDDE Program Purpose, Goals and Framework

The purpose of this plan is to document the Town’s IDDE program and to assist field staff and program staff with the proper identification, reporting, and resolution of pollution problems. A locus map with the regulated Urbanized Area shown is provided as **Figure 1-1** at the end of this section.

¹Note that at the time of preparation of this plan (June 2019), the 2014 303d list is the most up to date finalized 303d List as approved by USEPA on February 23, 2016.

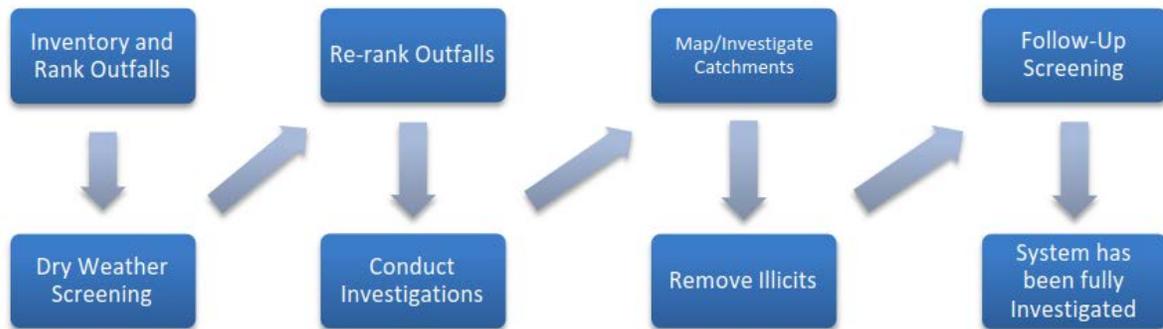
²“Approved TMDLs” are those that have been approved by EPA as of the date of issuance of the 2016 MS4 Permit.

³Dennis is subject to the *Final Pathogen TMDL for the Cape Cod Watershed*, August 2009.

The goals of the IDDE program are to find and eliminate illicit discharges to the 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;
- Follow-up screening; and
- Employee training.

The general IDDE investigation procedure framework is shown below:



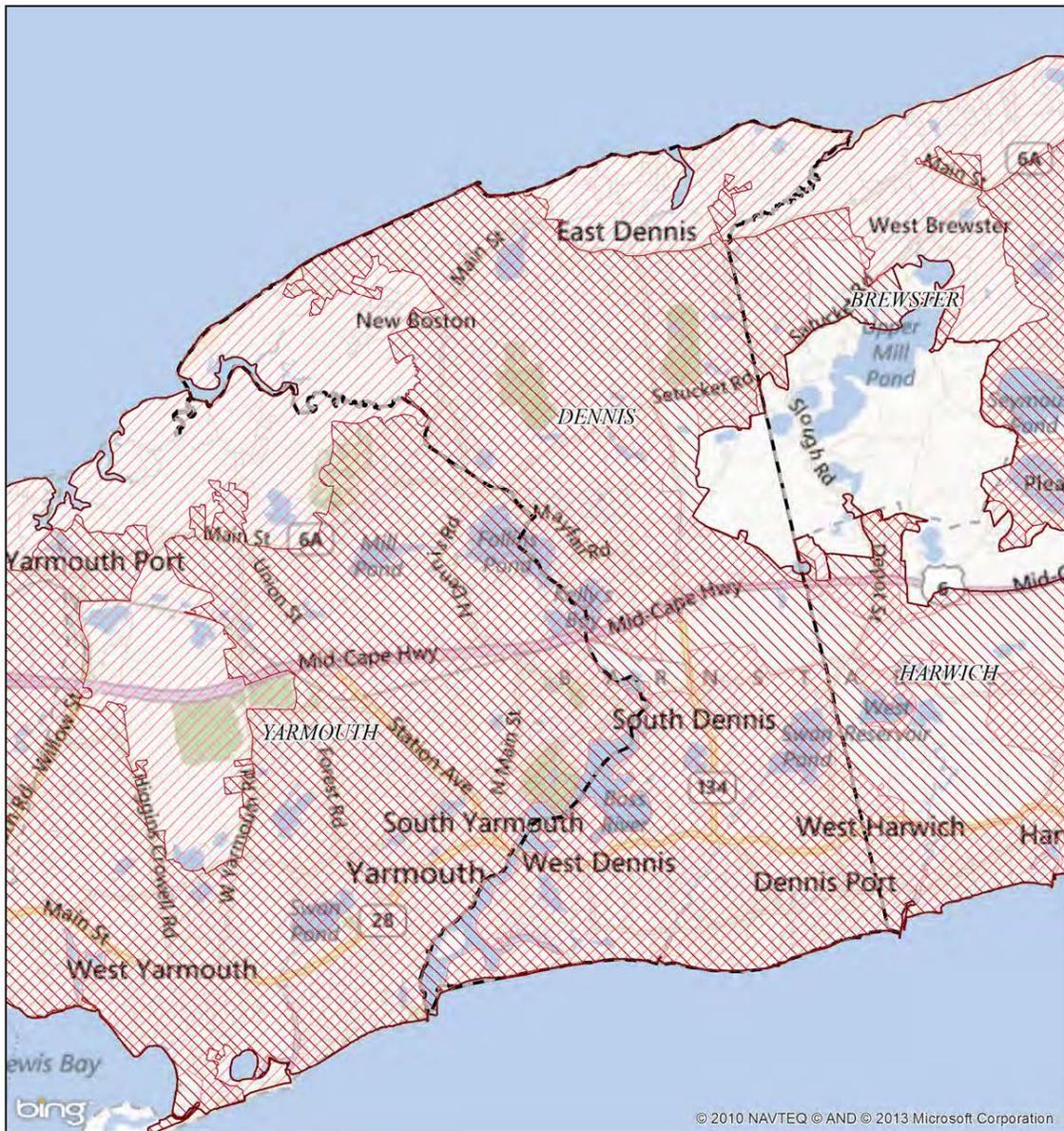
1.6 How to Use this Plan

This plan is intended to be used by Town of Dennis staff whose job involves frequent field or site visits, as well as staff responsible for administering the MS4 permit. This will likely include staff from the Department of Public Works, the Town Engineering Department, and the Health Department. This plan is divided into several sections and includes the following components:

- Section 2 Authority and Statement of IDDE Responsibilities** – references the Town’s legal authority to regulate illicit connections and discharges and identifies Town staff responsible for IDDE Program components.
- Section 3 Stormwater System Mapping** – outlines the procedures for completing required stormwater system mapping, as well as additional recommendations in the 2016 MS4 Permit.
- Section 4 Sanitary Sewer Overflows (SSOs)** – provides an inventory of known SSOs that have discharged to the MS4 and then to waterways within the

five (5) years prior to the effective date of the 2016 MS4 Permit, and outlines the procedures for their elimination.

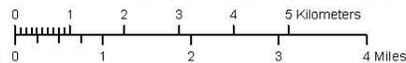
- Section 5** **Assessment and Priority Ranking of Outfalls** – assesses and ranks each outfall catchment area for illicit discharge potential. The ranking is used to prioritize IDDE investigations.
- Section 6** **Dry Weather Outfall Screening and Sampling** – outlines the procedures for performing outfall screening investigations during dry weather.
- Section 7** **Catchment Investigations** – details various additional investigations used to locate evidence of illicit discharges or SSOs and to isolate and confirm the source of the potential discharge within the outfall catchment area.
- Section 8** **Source Investigations** – describes methods for identifying the source of an illicit discharge.
- Section 9** **Illicit Discharge Removal** – describes methods for illicit discharge removal, as well as subsequent confirmation screening and discharge prevention.
- Section 10** **Training** – details the minimum IDDE training that will be made available to all employees involved in the IDDE program.
- Section 11** **Progress Reporting** – outlines the scope of annual progress reports which will evaluate the progress and success of the IDDE program.



**NPDES Phase II Stormwater Program
Automatically Designated MS4 Areas**

Dennis MA

Regulated Area:



Town Population: **14221**
Regulated Population: **14108**
(Populations estimated from 2010 Census)



Urbanized Areas, Town Boundaries:
US Census (2000, 2010)
Base map © 2013 Microsoft Corporation
and its data suppliers
US EPA Region 1 GIS Center Map #8824, 8/9/2013

Figure 1-1. Urbanized Area

2 Authority and Statement of IDDE Responsibilities

2.1 Legal Authority

The Town of Dennis has adopted an Illicit Bylaw as Article 44 of the general Town bylaws dated May 7, 2019 as required under the 2016 MS4 Permit. A copy of the bylaw is provided in the Stormwater Management Program (SWMP) Plan. This regulatory mechanism provides the Town of Dennis with adequate legal authority as required to comply with 2016 MS4 Permit requirements, including:

- Prohibit illicit discharges and unauthorized discharges to the MS4;
- Investigate suspected illicit discharges;
- Require the removal of all such illicit connections;
- Eliminate illicit discharges, including discharges from properties not owned by or controlled by the MS4 that discharge into the MS4 system; and
- Implement appropriate enforcement procedures and actions.

2.2 Statement of Responsibilities

The Department of Public Works (DPW), the Engineering Department (ED) and Health Department (HD) are responsible for implementing the IDDE program. The Board of Health or their appointed designee has the authority to enforce the Illicit Bylaw under Article 44 of the general Town bylaws dated May 7, 2019. IDDE Program Responsibilities include:

- Drainage system mapping (ED, GIS);
- Determining and inspecting key junction manholes (ED & HD);
- Catchment delineation and prioritization for field screening (DPW);
- Dry and wet weather outfall investigations where required (DPW, ED, HD);
- Performing systematic catchment investigations (DPW, ED, HD);
- Investigating and eliminating IDDE sources (DPW & HD);
- Enforcing IDDE ordinance requirements (DPW, ED, HD);
- Tracking illicit discharge connections and removals for annual reporting (DPW, ED, HD);
- Incorporating IDDE into public education efforts (DPW, HD); and
- Providing annual employee training (DPW, ED, HD).

3 Stormwater System Mapping

The 2016 MS4 Permit requires a detailed storm system map to facilitate 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 developed in two phases as outlined below. The Town Engineering Department and GIS Department are responsible for developing the stormwater system mapping pursuant to the 2016 MS4 Permit. The status of Dennis's stormwater infrastructure mapping is provided in **Appendix A** along with a copy of the map. The Town of Dennis will report on the progress towards completion of the storm system map in each annual report with updates to the stormwater mapping included in **Appendix A**.

3.1 Phase I Mapping

Phase I mapping must be completed within two (2) years of the effective date of the permit (July 1, 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 with a list of impairments as identified on the most recent EPA approved Massachusetts Integrated List of Waters report; and
- Initial catchment delineations. Topographic contours and drainage system information may be used to produce 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 (July 1, 2028) and include the following information:

- Outfall locations (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; and
- Municipal combined sewer system.

Note that Dennis's population relies on septic systems for wastewater management, and thus sanitary system and combined sewer system mapping components will not apply to the Town's mapping program.

3.3 Additional Recommended Mapping Elements

Although not required, the 2016 MS4 Permit recommends mapping the following items as additional components to the Town of Dennis's storm system mapping:

- Storm sewer material, size (pipe diameter), age;
- Sanitary sewer system material, size (pipe diameter), age;
- Privately owned stormwater treatment structures;
- Where a municipal sanitary sewer system exists, properties known or suspected to be served by a septic system, especially in high density urban areas;
- 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 investigations; and
- Locations of suspected, confirmed and corrected illicit discharges with dates and flow estimates.

As the Town of Dennis's IDDE program progresses through the mapping requirements of the next ten years, the Department of Public Works and the Health Department will assess the feasibility, usefulness, and cost implications of including some or all of the above information into the GIS database. Maps will be updated as additional information is obtained.

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.

Dennis's entire population relies on septic systems for wastewater management, and thus SSO considerations will not apply to the Town's program.

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

Catchments for each of the MS4 outfalls⁴ and interconnections⁵ have been delineated based on available topographic contours and mapped drainage infrastructure to define contributing areas for investigation of potential sources of illicit discharges. Initial catchment delineations will be continually refined as additional mapping is completed and to reflect information collected during catchment investigations.

5.2 Outfall and Interconnection Inventory and Initial Ranking

The Department of Public Works, the Health Department, and the Engineering Department completed an initial outfall and interconnection inventory and priority ranking to assess illicit discharge potential based on existing information. The inventory will be updated annually to include data collected in connection with dry weather screening and other relevant inspections and an updated inventory and ranking will be provided in each annual report.

For the ranking, outfalls and interconnections have been classified into one of the following categories:

- 1. Problem Outfalls:** Outfalls/interconnections with known or suspected contributions of illicit discharges based on existing information. This includes 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;
 - 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

⁴ **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.

⁵ **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 detectable levels of chlorine.

Note that Problem Catchments are only identified during the initial round of catchment ranking, and no additional catchments should be added to this category. If future evidence indicates that the above pollutant levels may be present, catchments must be ranked at the top of the High Priority Catchments list. Dry weather screening and sampling is not required for Problem Outfalls.

2. **High Priority Outfalls:** Outfalls/interconnections that have not been classified as Problem Outfalls and that contain any of the following characteristics:
 - Discharging to an area of concern to public health due to proximity of public beaches, recreational areas, drinking water supplies or shellfish beds;
 - Past discharge complaints;
 - Discharges exceeding water quality standards for bacteria; ammonia levels ≥ 0.5 mg/l; surfactants greater ≥ 0.25 mg/l;
 - Sites that have a potential to generate pollutants that could contribute to illicit discharges. Examples of these sites include car dealers, car washes, gas stations, garden centers, industrial manufacturing, etc.;
 - Industrial areas >40 years old where the sanitary sewer system is >40 years old;
 - Areas that were once serviced by septic systems that have been converted to sewer;
 - Areas that were once served by a combined sewer system, but have been separated;
 - Septic systems > 30 years old in residential land use and prone to failure;
 - Any river or stream that is culverted for distances greater than a simple road crossing; and
 - Catchment areas draining to waterbody segments impaired for bacteria and pathogens. In Dennis, this includes catchments that discharge directly to: Chase Garden Creek, Quivett Creek, Sesuit Creek, Bass River, and Swan Pond River.
3. **Low Priority Outfalls:** Outfalls/interconnections that do not meet any of the problem outfall, high priority outfall, or excluded (below) outfall criteria.
4. **Excluded outfalls:** Outfalls/interconnections with no potential for illicit discharges. 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.

The IDDE prioritization categories, from highest to lowest priority are Problem Outfalls, High Priority Outfalls and Low Priority Outfalls. Excluded Outfalls do not require any investigation. Outfalls that meet criteria in more than one category are automatically

assigned the higher of the priority categories. Those within the Problem and High Priority Outfall category are further ranked based on the number of criteria each outfall meets in the respective category. For example, the more criteria the outfall meets, the higher it is ranked in priority. Refer to **Appendix B** for a tabulated breakdown of the current prioritization (classification and ranking) for each outfall and a map identifying the prioritization by area. The map includes a grid overlay that breaks the Town into sections. The grid overlay is used to prioritize IDDE activities by section of Town (i.e., grid ID), rather than individual outfall, to more efficiently direct inspection activities by area.

Classifications and rankings will be updated as additional information is collected.

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) be inspected for the presence of dry weather flow.

The first step for detecting illicit (non-stormwater) connections in MS4s is to physically observe all regulated outfall discharge points in the field during periods of dry weather. Outfall locations are shown on the Town Drainage System Maps provided in **Appendix A**.

Stormwater discharges to culverted streams that cannot be easily accessed (i.e., underground discharge locations) should be inspected at the nearest upstream location (e.g., manhole structure or the last “downstream” catch basin before the outfall pipe).

A comprehensive SOP for Outfall Dry Weather Screening with checklist and forms is included in **Appendix C**. Screening procedures should be implemented starting with High Priority outfalls, followed by Low Priority outfalls, based on the initial priority rankings provided in **Appendix B**. Problem Outfalls do not require screening, rather proceed right to source investigations.

6.1 When to Inspect: 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 following sources:

1. Weather Underground, Station KMADENNI23 in Dennis, MA

6.2 What to Look For: Physical Characteristics

Illicit discharges can be intermittent or continuous as defined below:

- **Intermittent** – Intermittent discharges are short in duration, lasting only a short time and then disappearing. Examples include:
 - Materials that have been dumped into a storm drain (catch basin) or drainage way, and
 - A floor drain that is connected to the storm sewer.
- **Continuous** – Continuous discharges continue without changing, stopping, or being interrupted. Examples include:
 - Sanitary wastewater piping that is cross-connected from a building or sanitary sewer line to the storm sewer, and
 - An industrial operational discharge that is not permitted.

Some intermittent illicit discharges may only occur in wet weather or when one part of the system overflows. These flows are generally associated with combined sewer and drainage systems that can back up or bypass diversion structures during heavy flows and discharge wastes to the storm drain system, but can also occur with failing septic systems that pond and discharge through the surface. Illicit discharges can be detected at the stormwater outfall, as evident from unusual debris (e.g. toilet paper), stressed vegetation, sheen, etc.

Physical inspections should include observations for flow, and when flow is not present, for potential signs of intermittent illicit discharges. When flow is present, observations on the presence and severity of odor, color, turbidity and floatables should be made and recorded in accordance with the SOP and checklist in **Appendix D**. Observations for other physical indicators should also be made, under flowing and non-flowing conditions, including the condition of the outfall pipe, deposits or stains in the vicinity of the outfall, abnormal vegetation growth, the quality of any pooled water at the outlet and any benthic growth on the pipe. **Table 6-1** describes various physical observation parameters and what they may indicate.

Table 6-1. Physical Observation Parameters and Likely Flow Sources

Parameter	Observations	Interpretation
Odor	Sewage	Stale sanitary wastewater, especially in pools near outfall
	Sulfur (rotten eggs)	Industries that discharge sulfide compounds or organics (meat packers, canneries, dairies, etc.). Also could be petroleum related “high – sulfur” fuels
	Rancid-sour	Food preparation facilities (restaurants, hotels, etc.)
	Oil and gas	Petroleum refineries or many facilities associated with vehicle maintenance or petroleum product storage
	Chlorine	Pool discharges, washing activities
	Sweet / Fruity	Washing activities
	Sharp, pungent (chemicals)	Hazardous waste
Color	Yellow	Chemical plants, textile and tanning plants
	Brown	Meat packers, printing plants, metal works, stone and concrete, fertilizers, petroleum refining facilities, construction sites, and glass cutting
	Green	Chemical plants, textile facilities, algae/plankton bloom, antifreeze (fluorescent green), fertilizer
	Red	Meat packers, metal works, iron floc (bacterium)
	Gray	Dairies, food processing, sewage, concrete wash-out
	Red, Purple, Blue, Black	Fabric dyes, inks from paper and cardboard manufacturers
Turbidity	Cloudy	Sanitary wastewater, concrete or stone operations, fertilizer facilities, automotive dealers
	Opaque	Food processors, lumber mills, metal operations, pigment plants

Table 6-1 (continued). Physical Observation Parameters and Likely Flow Sources

Parameter	Observations	Interpretation
Floatable Matter	Oil sheen, grease	Petroleum refineries or storage facilities and vehicle service facilities, restaurants
	Sewage	Sanitary wastewater
Deposits & Stains	Sediment	Construction site erosion
	Oily	Sanitary wastewater
Vegetation	Excessive growth	Food product facilities, fertilizers, farming agricultural use
	Inhibited growth, stressed vegetation	High stormwater flows, beverage facilities, printing plants, metal product facilities, drug manufacturing, petroleum facilities, vehicle service facilities and automobile dealers
Pipe Benthic Growth	Brown	Elevated nutrient level, possibly from sewage or fertilizers
	Orange/Red	High iron and manganese concentration, not typically associated with illicit discharges
	Green	Elevated nutrient level, possibly from sewage or fertilizers
Damage to Outfall Structures	Concrete cracking	Industrial flows, chemicals
	Concrete spalling ¹	
	Peeling paint	
	Metal corrosion	

¹Concrete spalling: minor cracks and bulges in concrete caused by corrosion of the steel reinforcement inside the concrete.

6.3 What to Sample

If flow is present during a dry weather outfall inspection, a sample will be collected and analyzed for the required permit parameters⁶ listed in **Table 6-2**. Field test kits or field instrumentation can be used 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 for all waterbodies, other than indicator bacteria and any pollutants of concern.

Table 6-3 lists additional analyses for pollutants of concern in Dennis based on the 2014 Integrated List of Waters which must be sampled for select waterbodies. This list will require review and update each time a new list is finalized in Massachusetts. Updates will be maintained in **Appendix C** with the comprehensive SOP for Outfall Dry Weather Screening. Analytic procedures and user’s manuals for field test kits and field instrumentation are also provided in **Appendix C**.

⁶ 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).

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. **Tables 6-2 and 6-3** 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 C**.

Table 6-2. Sampling Parameters and Analysis Methods for All Waterbodies

Analyte or Parameter	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
Chlorine	CHEMetrics™ V-2000, K-2513 Hach™ Pocket Colorimeter™ II	NA
Conductivity	CHEMetrics™ I-1200 YSI Pro30 YSI EC300A Oakton 450	NA
Salinity	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) Method 1103.1; 1603; Colilert 12 16, Colilert-18 12 15 16; mColiBlue-24 17	NA
Surfactants (Detergents)	CHEMetrics™ I-2017	CHEMetrics™ K-9400 and K-9404 Hach™ DE-2
Temperature	YSI Pro30 YSI EC300A Oakton 450	NA
Pollutants of Concern ⁷ :	EPA certified laboratory procedure (40 CFR § 136)	NA
See Table 6-3	See Table 6-3	

⁷Where the discharge is directly into a water quality limited water or a water subject to an approved TMDL, samples must be analyzed for the pollutants of concern identified as the cause of the water quality impairment

Table 6-3. Additional Sampling Parameters for Discharges to Impaired Waters

Sample Parameter	Impairment	Impaired Water	Method
Fecal Coliform	Fecal Coliform	Chase Garden Creek Quivett Creek Sesuit Creek Bass River Swan Pond River	Laboratory Analysis: 1680; 1681
Total Nitrogen	Estuarine Bioassessments ⁸	Bass River Swan Pond River	Test Kit (e.g., Hach Colorimeter Test Kit, total nitrogen (TNT)) or Laboratory Analysis: 351.1/351.2 + 353.2

Samples for laboratory analysis must also be stored and preserved in accordance with procedures found in 40 CFR § 136. The SOP in **Appendix C** lists analytical methods, detection limits, hold times, and preservatives for laboratory analysis of dry weather sampling parameters.

6.3.1 Field Equipment

Table 6-4 lists field equipment commonly used for dry weather screening and sampling.

Table 6-4. 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

⁸Estuarine Bioassessments are listed as “contact MassDEP” in Appendix G of the 2016 MS4 Permit. Dennis contacted MassDEP prior to completion of this report and MassDEP indicated that equivalent sampling parameters are not expected to be available until fall 2019. However, Cape Cod waterbodies listed as impaired for Estuarine Bioassessments are typically nitrogen-driven. Additionally, both waterbodies had a TMDL for Total Nitrogen completed in May 2017. Thus, Dennis will sample both waterbodies for nitrogen.

Table 6-4 (continued). Field Equipment – Dry Weather Outfall Screening and Sampling

Equipment	Use/Notes
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
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

6.4 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 6-5** 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 indicate illicit discharges.

Table 6-5. Benchmark Field Measurements for Select Parameters

Parameter	Benchmark
Ammonia	>0.5 mg/L
Chlorine	>0.02 mg/L (detectable levels per the 2016 MS4 Permit)
Conductivity	>2,000 μ S/cm
Salinity	Reference only, determine type of bacteria analysis

Table 6-5 (continued). Benchmark Field Measurements for Select Parameters

Parameter	Benchmark
Indicator Bacteria ⁹ : <i>E.coli</i> <i>Enterococcus</i>	The geometric mean of the five most recent samples taken during the same bathing season shall not exceed: <i>E.coli</i> : 126 colonies per 100 ml and no single sample taken during the bathing season shall exceed 235 colonies per 100 ml <i>Enterococcus</i> : 33 colonies per 100 ml and no single sample taken during the bathing season shall exceed 61 colonies per 100 ml
Surfactants	>0.25 mg/L
Temperature	>83°F
Pollutants of Concern	>Applicable water quality criteria

Table 6-6 provides a summary on the types of discharge that may be encountered and follow-up actions to be performed. Additional information on next step actions is included in the Illicit Discharge Source Investigation SOP in **Appendix D**.

Table 6-6. Outfall Discharge Designation and Follow-Up Action

Type	Description	Action
Obvious Discharge	Outfalls where there is an illicit discharge that do not require sample collection for confirmation (e.g., strong sewage odors, gray sewage water, toilet paper, etc.)	Full source investigation
Suspect Discharge	Flowing outfalls with: 1) high severity on one or more physical indicators and 2) ammonia >0.5 mg/L, surfactants >0.25 mg/L, bacteria >WQ criteria OR ammonia >0.5 mg/L, surfactants >0.25 mg/L, & detectable levels of chlorine	Full source investigation
Potential Discharge	Flowing or non-flowing outfalls with presence of two or more physical indicators	Intermittent flow source investigation
Unlikely Discharge	Non-flowing outfalls with no physical indicators of an illicit discharge	No further action

6.5 Follow-up Ranking of Outfalls and Interconnections

The Town of Dennis 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.

⁹ Massachusetts Water Quality Standards:
<http://www.mass.gov/eea/docs/dep/service/regulations/314cmr04.pdf>

7 Catchment Investigations

The 2016 MS4 Permit requires that investigations be performed for all MS4-owned outfall catchment areas regardless of whether flows are observed at the outfall. The catchment area represents the drainage area to the outfall. Catchment investigations must include: 1) a review of mapping and historic plans and records for each catchment to identify system vulnerability factors; 2) a manhole inspection methodology; and 3) procedures to isolate and confirm sources of illicit discharges.

This section outlines a systematic procedure to investigate outfall catchments. All data collected as part of the catchment investigations will be recorded and reported in each annual report.

7.1 Dry Weather Key Junction Structure Inspections

In addition to the outfall screening discussed in Section 6, catchment investigations of key junction manholes must be performed during dry weather conditions. 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/structures 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 or structures that can represent one or more junction manholes/structures 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/structure as a key junction manhole/structure would not affect the permittee's ability to determine the possible presence of an upstream illicit discharge. A permittee may exclude a junction manhole/structure located upstream from another located in the immediate vicinity or that is serving a drainage alignment with no potential for illicit connections.

Key junction manholes were identified and mapped for Dennis's regulated MS4 system. These are included on the map(s) in **Appendix A**. These were identified by first identifying all junction manholes/structures with two or more inlets and then eliminating those that were located in the immediate vicinity of the outfall, in the immediate vicinity of another key junction manhole and those that only received flow from one or two catch basins with no potential for illicit connections.

For all catchments identified for investigation field crews will systematically inspect key junction manholes for evidence of illicit discharges during dry weather. A stormwater key junction manhole screening standard operating procedure (SOP) and checklist is included in

Appendix E. Screening procedures should be implemented beginning with High Priority Outfalls and ending with Low Priority Outfalls. Problem Outfalls do not require screening, rather proceed right to source investigations (refer to Section 6.0).

7.1.1 When to Inspect

Visual inspections for illicit discharges must occur during dry weather conditions. Dry weather conditions are defined as a minimum of 24 consecutive hours with less than 0.10 inches of rainfall and no significant snow melt is occurring. MS4s are designed to only carry stormwater runoff. If a flow exists at a discharge point during the dry weather inspections, it is identified as a potential illicit discharge.

7.1.2 What to Look For: Physical Characteristics

Each identified key junction manhole must be opened and inspected systematically for visual and olfactory evidence of illicit connections (e.g., excrement, toilet paper, gray filamentous bacterial growth, or sanitary products present). The same observation made for outfalls can also be applied to key junction manhole investigations. Refer to **Table 6-1** in Section 6.0 for parameters and what they mean.

Key junction manholes within the same catchment area can be inspected working from the outfall upstream or working from the most upstream key junction manholes down towards the outfall.

7.1.3 What to Sample

If flow is observed in any manhole, a sample must be collected and analyzed for:

- Ammonia
- Chlorine
- Surfactants

Field kits or instrumentation can be used for these analyses.

7.1.4 Interpreting Key Junction Inspection Results

Where sampling results or visual or olfactory evidence indicate potential illicit discharges or SSOs (**Table 7-1**), the area draining to the junction manhole must be flagged for further upstream investigation to isolate and confirm sources of illicit discharges in accordance with Section 8.0. Key junction and subsequent manhole investigations will proceed until the location of suspected illicit discharges or SSOs can be isolated to a pipe segment between two manholes.

Screening procedures should be implemented beginning with High Priority Catchments and ending with Low Priority Catchments. Problem Outfalls do not require screening and should instead proceed right to source investigations (refer to Section 8). A comprehensive SOP for

Key Junction Manhole Dry Weather Screening with checklist and forms are included in **Appendix E**.

Table 7-1. Key Junction Discharge Designation and Follow-Up Action

Type	Description	Action
Obvious Discharge	Key junction manholes where there is an illicit discharge that do not require sample collection for confirmation (e.g., strong sewage odors, gray sewage water, toilet paper, etc.)	Full source investigation
Suspect Discharge	Flowing key junction manholes with: 1) high severity on one or more physical indicators and 2) ammonia >0.5 mg/L, surfactants >0.25 mg/L, & detectable levels of chlorine	Full source investigation
Potential Discharge	Flowing or non-flowing key junction manholes with presence of two or more physical indicators	Intermittent flow source investigation
Unlikely Discharge	Non-flowing key junction manholes with no physical indicators of an illicit discharge	No further action

7.2 System Vulnerability Factors and Wet Weather Sampling

Wet weather screening and sampling is required where System Vulnerability Factors (SVFs) exist within a catchment area, including:

- 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 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.

EPA recommends that the following SVFs also be considered:

- Sewer pump/lift stations, siphons, or known sanitary sewer restriction 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 or 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).

Dennis has never had a sanitary sewer system and has not had any wide-spread code-required septic system upgrades required at property transfers or history of multiple Board of Health actions addressing widespread septic system failures. Based on this information, no SVFs were identified and wet weather sampling is not currently required. Should SVFs be identified in the future, wet weather sampling will be performed in accordance with the SOP included in **Appendix F**.

The SVF inventory (**Appendix B**) will be updated as new information becomes available and included in the annual report.

7.2.1 When to Sample: Wet Weather Conditions

Where a minimum of one System Vulnerability Factor (SVF) is identified based on previous information or the catchment investigation, one wet weather screening and sampling event shall be performed at the outlet. A comprehensive SOP for Catchment Wet Weather Sampling with checklist and forms are included in **Appendix F**, however inspections will generally 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 8.
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.

7.2.2 What to Sample: Wet Weather Conditions

Samples collected during wet weather investigations should be analyzed for:

- Ammonia
- Chlorine
- Conductivity
- Salinity

- *E.coli* (freshwater receiving water) or enterococcus (saline or brackish receiving water)
- Surfactants (such as MBAS)
- Temperature
- Pollutants of concern – where the discharge is directly into a water quality limited water or a water subject to an approved TMDL, the sample shall be analyzed for the pollutant(s) of concern identified as the cause of the impairment

All analyses, with the exception of indicator bacteria can be performed with field test kits or field instrumentation. Refer to **Table 6-6** in Section 6.0 for additional details on acceptable concentrations that can be used to assess potential illicit discharges from Dennis’s MS4.

7.2.3 Interpreting Wet Weather Sampling Results

Wet weather sampling results can be compared to the benchmark values in **Table 6-5**. Screening values that exceed these benchmarks may be indicative of pollution and/or illicit discharges that warrant further investigation. In the case of wet weather sampling, low to moderate levels of bacteria may be associated with wildlife or domestic animal feces, rather than an illicit connection. Similarly, slight exceedances of ammonia benchmarks may also be caused by natural conditions. However, evidence of surfactants and/or chlorine are more likely to be attributed to man-made sources. All data collected during preparation of the IDDE Plan and throughout the catchment investigation process, including information on the surrounding land uses, visual and olfactory observations during dry and wet weather screening, age and history of surrounding septic tanks and/or sewer, storm characteristics, and water quality data should be considered in determining the potential presence of an illicit discharge and the steps for investigation.

Exceedances of one or more parameters by substantial amounts (e.g., an order of magnitude) may be indicative of an illicit discharge and a follow-up round of wet weather sampling should be performed. If additional samples deliver similar results, additional manhole sampling should be completed during wet weather in an attempt to “bracket” a potential source to confirm the presence or absence of an illicit discharge.

8 Source Investigations

Once an illicit discharge is identified at an outfall or manhole, further investigation is necessary to identify the specific point where the illicit discharge comes from (source). The objective of a source investigation is to trace the path of an illicit discharge from the outfall or manhole to the upstream source.

The following methods may be used in isolating and confirming the source of illicit discharges

- Field Reviews;
- Sandbagging;
- Smoke Testing;
- Dye Testing;
- CCTV/Video Inspections;
- Optical Brightener Monitoring; and
- IDDE Canines.

Public notification is an important aspect of a detailed source investigation program. Prior to smoke testing, dye testing, or TV inspections, the Department of Public Works will notify property owners in the affected area. These methods are described in more detail below.

8.1 Field Reviews

Reviewing the drainage system and land uses within contributing catchment areas is the first and perhaps the most efficient method for identifying the source of an illicit discharge. It is important for field crews to observe the land use and activities around the upgradient drainage system to determine if there are any obvious sources of the illicit discharge, as a quick review of nearby land uses and activities may reveal the source immediately. In addition, field crews can simply follow the non-stormwater discharge if it is flowing by tracing the drainage system such as manholes and connecting drainage pipes (refer to SOP in **Appendix D**). Sampling these upgradient connections may also indicate where the source is located. However, some cases may require additional methods, such as sandbagging, dye testing, smoke testing, or television inspection as discussed below, if a flow cannot be traced due to blind connections or complicated drainage networks.

8.2 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 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.

8.3 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).

To be most effective, pipes may need to be plugged to prevent smoke from easily escaping through manholes, catch basins, or daylight areas. If a cross connection exists, smoke should appear from the building's sanitary sewer vent at the roof. The smoke should not affect residents since nearly all sanitary sewer systems have a trap to prevent odors from backing up into the house; however, residents with respiratory conditions may need to be monitored or evacuated from the area of testing to ensure safety during testing. In many cases, smoke testing should only be used once an unknown pipe is identified. The individual pipe can be plugged and filled with smoke while workers look for signs of smoke at nearby buildings or facilities.

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. This notification presents a good opportunity to involve the public as observers during the smoke test and to educate local residents about stormwater, allowable non-stormwater discharges and illicit discharges. Providing the public with an opportunity to participate in the illicit discharge source investigation will promote IDDE efforts and awareness throughout town.

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. Note that 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.

8.4 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 its 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. Successful Tips for dye testing are provided in **Table 8-1**.

8.5 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.

8.6 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 samples 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.

8.7 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.

Table 8-1. Tips for Successful Dye Testing

Dye Selection

- Green and liquid dyes are the easiest to see.
- Dye test strips can be a good alternative for residential or some commercial applications. (Liquid can leave a permanent stain).
- Check the sanitary sewer before using dyes to get a “base color.” In some cases, (e.g., a print shop with a permitted discharge to the sanitary sewer), the sewage may have an existing color that would mask a dye.
- Choose two dye colors, and alternate between them when testing multiple fixtures.

Selecting Fixtures to Test

- Check the plumbing plan for the site to isolate fixtures that are separately connected.
- For industrial facilities, check most floor drains (these are often misdirected).
- For plumbing fixtures, test a representative fixture (e.g., a bathroom sink).
- Test some locations separately (e.g., washing machines and floor drains), which may be misdirected.
- If conducting dye investigations on multiple floors, start from the basement and work your way up.
- At all fixtures, make sure to flush with plenty of water to ensure that the dye moves through the system.

Selecting a Sewer Manhole for Observations

- Pick the closest manhole possible to make observations (typically a sewer lateral).
- If this is not possible, choose the nearest downstream manhole.

Communications Between Crew Members

- The individual conducting the dye testing calls in to the field person to report the color dye used, and when it is dropped into the system.
- The field person then calls back when dye is observed in the manhole.
- If dye is not observed (e.g., after two separate flushes have occurred), dye testing is halted until the dye appears.

Locating Missing Dye

- The investigation is not complete until the dye is found. Some reasons for dye not appearing include:
 - The building is actually hooked up to a septic system.
 - The sewer line is clogged.
 - There is a leak in the sewer line or lateral pipe.

Source: Center for Watershed Protection. Illicit Discharge Detection and Elimination, A Guidance Manual for Program Development and Technical Assessments. October 2004.

9 Illicit Discharge Removal

When the specific source of an illicit discharge is identified, the Town of Dennis will exercise its authority as necessary to require its removal. The Department of Public Works and Board of Health will collect relevant documentation and records to pursue illicit discharge removal through voluntary elimination or legal enforcement.

9.1 Removal Options

9.1.1 Voluntary Elimination

The voluntary elimination of illicit discharges is strongly encouraged. Through voluntary elimination, the responsible party of an illicit discharge can be contacted directly and informed about the incident. A responsible Town official should make this contact after an illicit discharge has been identified and verified. When a responsible party is contacted, the following information should be provided:

- Details on the identification and verification process;
- Information on the actions that should be implemented to correct the problem and the schedule for performing them; and
- Potential support and incentives that the Town can offer as a result of the voluntary approach.

This approach is the quickest and provides an opportunity for the responsible party to correct the problem in a cost-effective manner, versus a legal enforcement obligation, which is discussed below.

9.1.2 Legal Enforcement

Legal enforcement action may be necessary to completely eliminate illicit discharges in the Town, particularly those that have significant cost implications. Dennis has established legal authority for enforcement of IDDE requirements as outlined in Article 44 of the general Town bylaws dated May 7, 2019 as required under the 2016 MS4 Permit and provided in the SWMP Plan. This regulatory mechanism in part allows for enforcement of the regulations, orders, violation notices, and enforcement orders, and may pursue civil and criminal remedies for such violations.

9.2 Reporting

All illicit discharge information should be recorded on the Illicit Discharge Tracking Form in **Appendix G** for each location, with overall actions recorded in the Illicit Discharge Log provided in **Appendix G**. The illicit discharge will be removed within sixty (60) days of its confirmation where possible, otherwise a schedule will be established for its elimination with dates and schedules identified in the MS4 annual report. The annual report will also 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; and
- Estimate of the volume of flow removed.

9.3 Confirmatory Outfall Screening

Confirmatory outfall screening will be completed within one year of removal of all identified illicit discharges within a catchment area and include confirmatory outfall or interconnection screening. 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. Procedures will follow those outlined earlier in this chapter and in the appendices of this IDDE Plan. If confirmatory screening indicates evidence of additional illicit discharges, the catchment will be scheduled for additional investigation.

9.4 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, as needed, and scheduled for ongoing screening once every five 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 7.2. All sampling results will be reported in the annual report.

9.5 IDDE Prevention

Preventing future illicit discharges is also critically important. Prevention of illicit discharges is achieved through education, outreach, and advocacy. Education and advocacy programs that identify where and when possible illicit discharges and connections occur are good long-term prevention activities. The following activities can be used to help prevent illicit discharges to the drainage system:

- Integrate IDDE information into public education and outreach components;
- Encourage awareness and promote stewardship of the storm drain system in neighborhoods, emphasizing the cause and effect relationship between non-stormwater inputs to the drainage system and water quality of receiving waters;
- Utilize the annual IDDE program evaluation results to promote and support the program throughout the Town; and
- Use the Town's website and provide a phone number for citizens to report suspected illicit discharges.

10 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 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 the IDDE Employee Training Record provided in **Appendix H**. The frequency and type of training will be included in the annual report.

11 Progress Reporting

11.1 Program Activity and Timeline

A summary of the required IDDE activities and timelines are provided below:

<u>Activity</u>	<u>Timeline</u>
Sanitary Sewer Overflow Inventory	Complete by June 30, 2019 (N/A – no sewer)
Initial Catchment Ranking	Complete by June 30, 2019
Mapping:	
• Outfalls and Interconnections	Complete by June 30, 2020
• Initial Catchment Delineation	Complete by June 30, 2020
• Remaining Mapping	Complete by June 30, 2028
Dry Weather Outfall Inspections	Complete by June 30, 2021
Catchment Investigations:	
• Problem Catchments	Begin by July 1, 2020 Complete by June 30, 2025
• All w/Potential Illicit Discharges	Complete by June 30, 2025
• All Outfalls Complete	Complete by June 30, 2028
Source Investigation	As soon as sampling results indicating an illicit discharge are obtained and evaluated
Source Elimination	Within 60 days of its identification or, if not possible, in accordance with schedule established by the Town (refer to Section 9)
Confirmatory Samples	Within 1 year of illicit discharge elimination
Follow-Up Screening	Reprioritize and resample all outfalls for weather conditions as per the first round within 5 years
Employee Training	Perform annually
Recordkeeping	At all times for all activities

11.2 Annual Recordkeeping

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 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 event;
- Number of enforcement notices issued;
- All dry weather and wet weather screening and sampling results;
- Estimate of the volume of sewage removed, as applicable; and
- Number of employees trained annually.

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

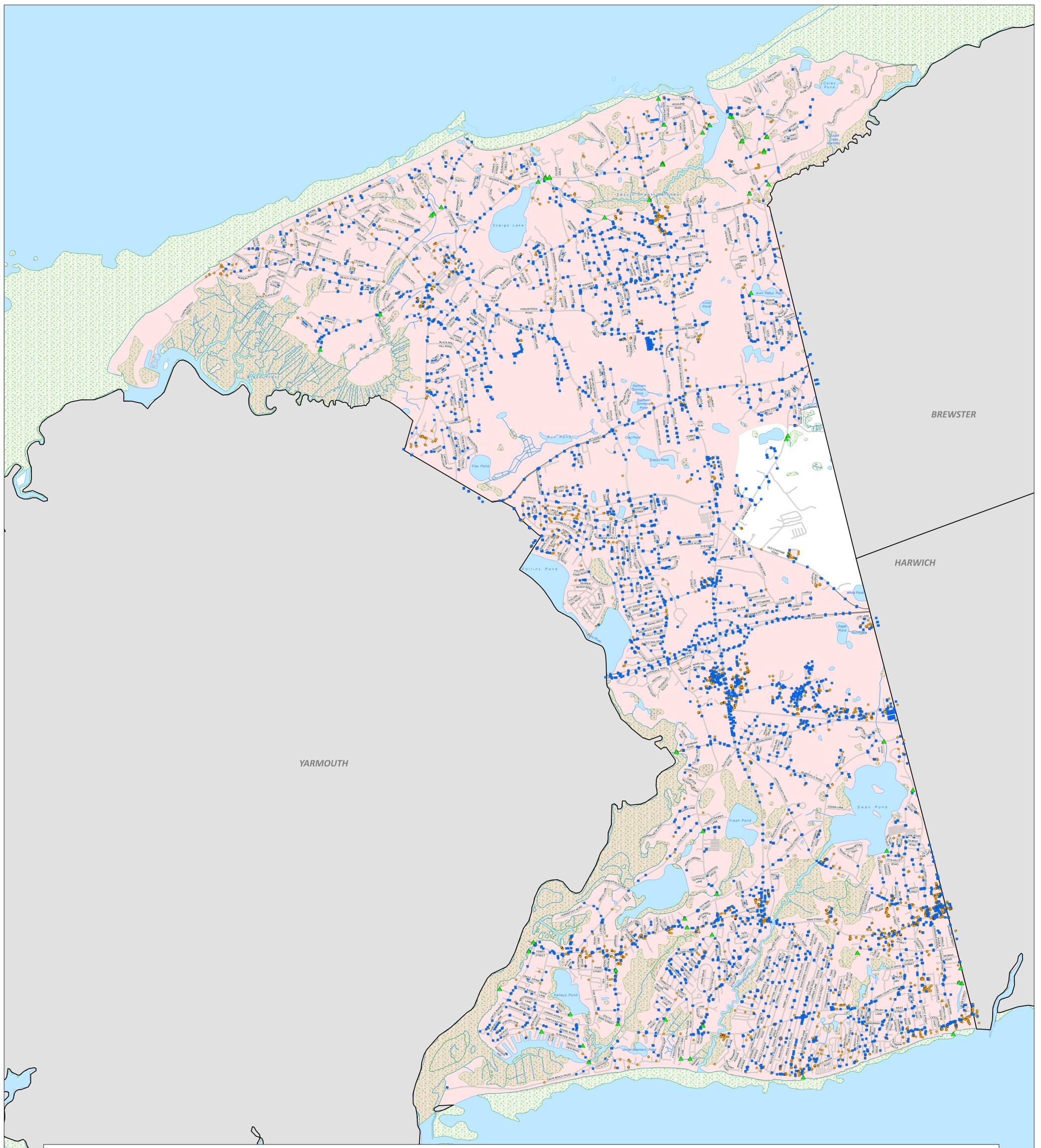
Appendix A

Stormwater System Mapping

Status of Stormwater System Mapping as of June 2019

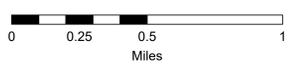
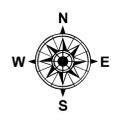
Requirement Summary	Status
Phase I – Must be Complete by July 1, 2020	
1. Outfalls and receiving waters	99% Complete
2. Open channel conveyances	Complete (updates ongoing)
3. Interconnections with other MS4s	Complete
4. Municipally owned structural BMPs	Not started
5. Waterbodies names and impairments	Complete
6. Initial catchment delineations by topo	Complete
Phase II – Must be Complete by July 1, 2028	
1. Outfalls with spatial accuracy +/-30 feet	Complete
2. Pipe connectivity	Complete (updates ongoing)
3. Manholes	Complete
4. Catch basins	Complete
5. Refined catchment delineations	Not started
6. Municipal sanitary system	Not Applicable
7. Municipal combined sewer system	Not Applicable

Additional outfalls may be found while completing the field inspections and should be added to the drainage map, and ranking and monitored.



Legend

- ▲ Outfalls
- Catch Basins
- Manholes
- * Storm Water BMPs
- Drainage Pipes
- Roads
- Urbanized Area
- Lake, Pond, Reservoir
- Wetland, Marsh, Swamp
- ~ Stream, Brook

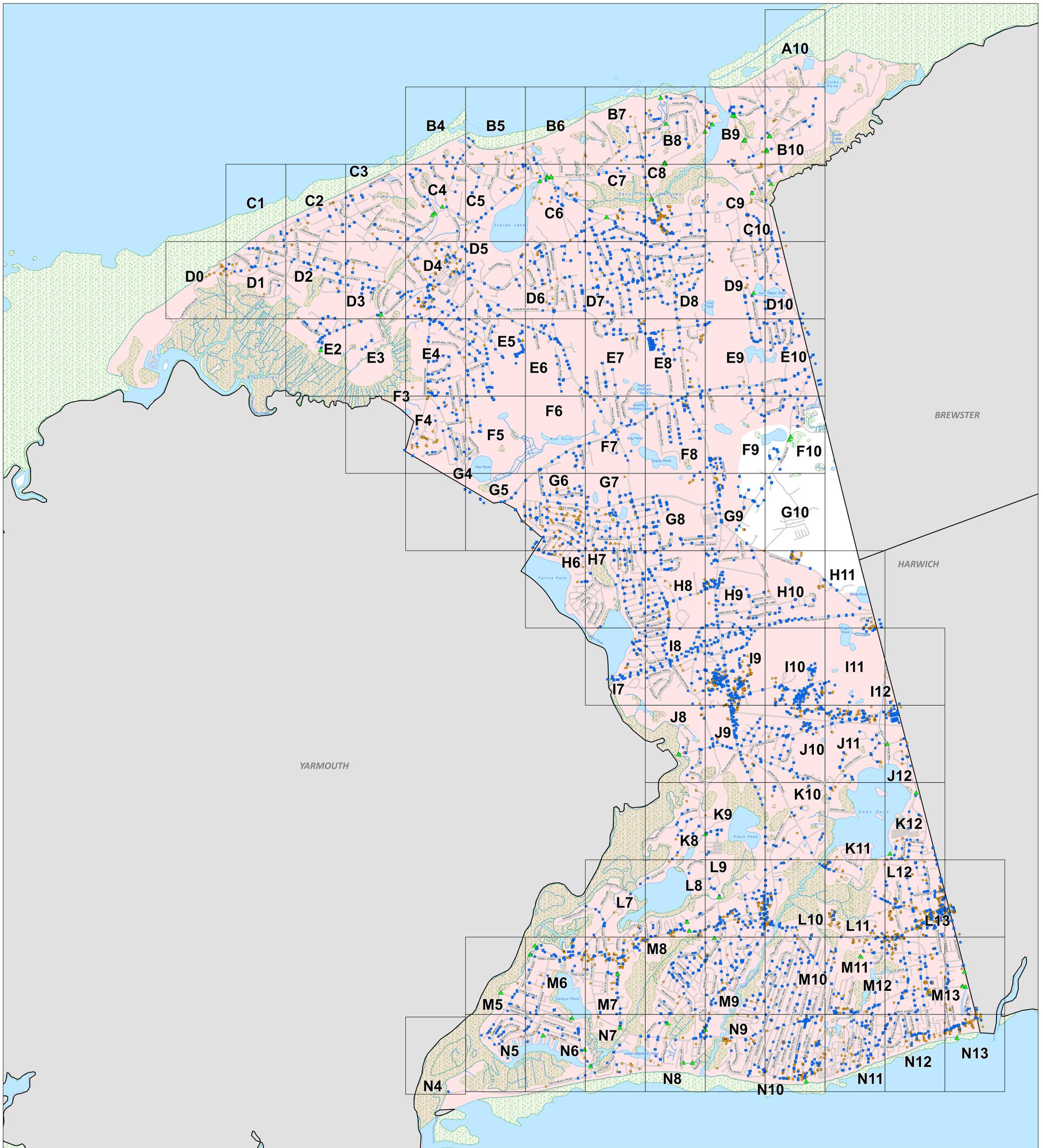


**Stormwater Map
Dennis, MA**

Comprehensive
Environmental
Incorporated

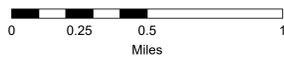
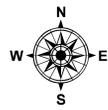


Data Sources: CEI, MassGIS, Town of Dennis



Legend

- ▲ Outfalls
- Catch Basins
- Manholes
- * Storm Water BMPs
- Drainage Pipes
- Roads
- Urbanized Area
- Lake, Pond, Reservoir
- Wetland, Marsh, Swamp
- ~ Stream, Brook



**Stormwater Master Tile Map
Dennis, MA**

Comprehensive
Environmental
Incorporated



Data Sources: CEI, MassGIS, Town of Dennis

Appendix B

IDDE Outfall Classification/Ranking & Vulnerability Assessment

Dennis, MA Vulnerability Assessment

Outfall ID	History of SSOs	Common or twin-inert manholes serving storm & sanitary sewer alignments	Common trench construction serving storm & sanitary sewer alignments	Crossings of storm & 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 sewers systems	Sanitary sewer infrastructure defects (e.g., 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 I/I, etc.)	Sewer pump/lift stations, siphons, sewer restrictions where power/equipment failures or blockages could result in SSOs	Sanitary sewer & storm drain infrastructure >40 years old	Widespread code-required septic system upgrades required at property transfers due to inadequate soils, water table separation or other physical constraints rather than poor owner maintenance	History of multiple BOH actions addressing widespread septic system failures due to inadequate soils, water table separation, or other physical constraints, rather than poor owner maintenance	Wet Weather Sampling Required? (Y or N)
OF-1													
OF-2													
OF-3													
OF-4													
OF-5													
OF-6													
OF-7													
OF-8													
OF-9													
OF-10													
OF-11													
OF-12													
OF-13													
OF-14													
OF-16													
OF-17													
OF-18													
OF-19													
OF-20													
OF-21													
OF-22													
OF-23													
OF-24													
OF-25													
OF-26													
OF-27													
OF-28													
OF-34													
OF-38													
OF-39													
OF-40													
OF-41													
OF-42													
OF-44													
OF-45													
OF-51													
OF-52													
OF-53													

Dennis, MA Vulnerability Assessment

Outfall ID	History of SSOs	Common or twin-inert manholes serving storm & sanitary sewer alignments	Common trench construction serving storm & sanitary sewer alignments	Crossings of storm & 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 sewers systems	Sanitary sewer infrastructure defects (e.g., 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 I/I, etc.)	Sewer pump/lift stations, siphons, sewer restrictions where power/equipment failures or blockages could result in SSOs	Sanitary sewer & storm drain infrastructure >40 years old	Widespread code-required septic system upgrades required at property transfers due to inadequate soils, water table separation or other physical constraints rather than poor owner maintenance	History of multiple BOH actions addressing widespread septic system failures due to inadequate soils, water table separation, or other physical constraints, rather than poor owner maintenance	Wet Weather Sampling Required? (Y or N)
OF-54													
OF-56													
OF-57													
OF-58													
OF-59													
OF-60													
OF-61													
OF-63													
OF-64													
OF-65													
OF-66													
OF-67													
OF-68													
OF-69													
OF-70													
OF-71													
OF-72													
OF-74													
OF-75													

Note: as of June 30, 2019, the town has no applicable SVFs under the 2016 MS4 Permit.

Appendix C

SOP for Dry Weather Outfall Inspection/Sampling

Dry Weather Outfall Inspection/Sampling SOP

Purpose of SOP

1. The inspection of stormwater drainage outfalls and interconnections to assess the **condition of the structure**;
2. The inspection of stormwater drainage outfalls and interconnections to assess the **possibility of illicit discharges**; and
3. The **collection of samples** during dry weather conditions.

Prior to the Leaving the Facility

1. **Check the weather**: Dry weather screening and sampling shall proceed only when no more than 0.1 inches of rainfall has occurred in the previous 24-hour period and no significant snow melt is occurring.
2. **Gather** all required equipment and materials:
 - Necessary Forms:
 - Form 1: Outfall Description and Condition Inventory and Inspection
 - Form 2: Illicit Discharge Detection Inspection
 - Form 3: Dry Weather Water Quality Sampling Form
 - Multi-meters for chlorine, conductivity, salinity, and temperature
 - Sample kits ammonia and surfactants
 - Sampling bottles for *E. coli* analysis
 - Sampling bottles for fecal coliform and total nitrogen (*for discharges to impaired and TMDL waters only*)
 - Dipper with extension rod
 - Tape measure
 - Pen
 - Cooler with ice or ice packs to transport samples
3. **Calibrate** meters following methods in the instruction manuals.

In Field

1. **Observe** each outfall under dry weather conditions. If an outfall/interconnection is inaccessible or submerged, proceed to the first accessible upstream manhole or structure for the observation and sampling.
2. **Record observations** about the condition of the outfall and interconnection on **Form 1: Outfall Description and Condition Inventory and Inspection**. Take photos and document on form.
3. **Record observations** about the possibility of an illicit discharge on **Form 2: Illicit Discharge Detection Inspection**. Take photos and document on form.
4. If flow is present, **collect samples** for analysis following procedures in **Table 1**. Follow hold times and instructions in **Table 2**. Record information in **Form 3**.
5. **Report** any signs of illicit discharges to your supervisor.

Dry Weather Outfall Inspection/Sampling SOP

Form 1: Outfall Description and Condition Inventory and Inspection

Inspection Information						
Outfall ID						
Outfall Location						
Inspector's Name						
Date of Inspection						
Rainfall (in)	Last 24 hours:		Last 48 hours:			
Outfall Description						
Type of Outfall (circle)	Material	Shape	Dimensions	Submerged		
Closed Pipe	<input type="checkbox"/> RCP <input type="checkbox"/> CMP <input type="checkbox"/> HDPE <input type="checkbox"/> Aluminum Other: _____	<input type="checkbox"/> Circular <input type="checkbox"/> Elliptical <input type="checkbox"/> Box Other: _____	Diameter/ Dimensions:	<u>In water:</u> <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully	<u>With sediment:</u> <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully	
	Open Drainage	<input type="checkbox"/> Paved <input type="checkbox"/> Grass <input type="checkbox"/> Rip-rap Other: _____		<input type="checkbox"/> Trapezoid <input type="checkbox"/> Parabolic Other: _____	Depth: _____ Top Width: _____ Bottom Width: _____	
Condition Assessment						
Outfall Damage:	No	Yes	Damage Type: Spalling			Cracking/Chipping
Deposits:	No	Yes	None	Grease/Oil	Trash	Foam
Sediment:	No	Yes, Depth:	None	Minor	Moderate	High
Vegetation Distress:	No	Yes	Little or No	Moderate	High	N/A
Erosion Damage:	No	Yes	Little or No	Moderate	High	N/A
Comments or any other non-illicit discharge concerns (e.g. trash or needed infrastructure repairs?):						

Dry Weather Outfall Inspection/Sampling SOP

Form 2: Illicit Discharge Detection Inspection

Outfall ID:		Date:	
Outfall Location:		Inspector's Name:	
Indicators (all outfalls with indicators)			
Indicator	Description (circle all that apply)		
<input type="checkbox"/> Deposits and Stains	Oily	Flow Line	Paint Other:
<input type="checkbox"/> Poor Pool Quality (circle)	Odors	Colors	Oil Sheen Suds Algae Floatables Other:
<input type="checkbox"/> Pipe Benthic Growth (circle)	Brown	Orange	Green Other:
Flow Description			
Flow Present:	Yes	No	Notes:
Flow Description:	Trickle	Moderate	Substantial
		Flow Depth:	
Physical Indicators (flowing outfalls)			
Indicator	Description	Severity Indicators	Notes
Odor	<input type="checkbox"/> Sewage	<input type="checkbox"/> 1 – Faint (unclear source) <input type="checkbox"/> 2 – Easily detected <input type="checkbox"/> 3 – Noticeable from a distance	<i>Confirm the odor is coming from the discharge location and water and not the surrounding area. Avoid deeply inhaling odors as they may potentially be harmful vapors.</i>
	<input type="checkbox"/> Petroleum/Gas		
	<input type="checkbox"/> Sulfide		
	<input type="checkbox"/> Rancid/Sour		
	<input type="checkbox"/> Other: _____		
Color	<input type="checkbox"/> Clear <input type="checkbox"/> Brown	<input type="checkbox"/> 1 – Faint colors in sample bottle <input type="checkbox"/> 2 – Clearly visible in sample bottle <input type="checkbox"/> 3 – Clearly visible in the flow	<i>Color is defined by the tint or intensity of color observed.</i>
	<input type="checkbox"/> Gray <input type="checkbox"/> Yellow		
	<input type="checkbox"/> Green <input type="checkbox"/> Orange		
	<input type="checkbox"/> Red <input type="checkbox"/> Other: _____		

Turbidity/ Cloudiness		<input type="checkbox"/> 1 – Slight <input type="checkbox"/> 2 – Cloudy <input type="checkbox"/> 3 – Opaque	<i>Turbidity or cloudiness is a measure of how easily light can penetrate through the sample.</i>
Floatables (other than trash)	<input type="checkbox"/> Sewage (toilet paper, etc.) <input type="checkbox"/> Suds <input type="checkbox"/> Petroleum/oil sheen <input type="checkbox"/> Other: _____	<input type="checkbox"/> 1 – Few/slight; origin not obvious <input type="checkbox"/> 2 – Some; indications of origin <input type="checkbox"/> 3 – Some; origin clear	<i>- In some cases, surface sheens may be created by in-stream processes. A thick or swirling sheen with a gas-like odor may indicate an oil discharge.</i> <i>- Suds that break up quickly may simply indicate water turbulence. Suds with a strong organic/sewage odor may indicate sewage. Suds with a fragrant odor may indicate laundry water.</i>
Possibility of Illicit Discharge			Sum of Severity Indicators: _____
<input type="checkbox"/> Unlikely	<input type="checkbox"/> Potential (two or more indicators)	<input type="checkbox"/> Suspect (one or more indicators at severity 3)	<input type="checkbox"/> Obvious
Comments/Possible Sources:			

Dry Weather Outfall Inspection/Sampling SOP

Table 1: Sampling Protocol

General Sampling Protocols

- 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.

Sample Collection Protocols

- 1) Bring all materials and equipment including all forms, the cooler containing the sample bottles, and multi-meters to the site where the sample is going to be taken.
- 2) For any sample to be collected with a **multi-meter**, follow this protocol:
 - a. Turn on multi-meters and place the probe in the flow being careful not to let it rest on the bottom or become encased in sediment.
 - b. Once the numbers on the probe have stopped changing, record data from the multi-meters onto **Form 3: Dry Weather Water Quality Sampling Form**.
- 3) For any sample that must be collected by **bottle**, follow this protocol:
 - a. Put on clean, powder-free nitrile gloves and be careful not to touch anything other than the dippers or the sampling containers.
 - b. The second sampler should be prepared to open bottles and hand them to the first sampler when needed. The bottle caps should be left in the bags and not placed on the ground or other surface.
 - c. Keep hands away from the bottle opening to prevent contamination.
 - d. Collect the sample by placing the bottle in the main stream of flow, being careful not to allow the water to flow over your hands or the outside of the bottle first.
 - e. Do not overfill the bottle (only fill to about ½ inch from the top of the bottle) and do not dump any liquid from them as some of the bottles supplied by the lab have preservatives.
 - f. Once the sample bottle is filled, immediately hand the bottle to the second sampler to place and tighten the cap on the bottle.
 - g. Label sample bottle with location, date, and time.
 - h. Place the bottle in the plastic bag and immediately store it in the cooler before taking the next sample.
 - i. If the flow cannot be reached by the sampler, remove the dipper and extension rod from the sealed bag. Fill and rinse the dipper in the flow three times being careful not to disturb the sediment. Collect the sample in the dipper and carefully pour into the bottle following the protocol listed above.
- 4) Complete **Form 3: Dry Weather Water Quality Sampling Form** if analytical samples were collected, specify parameters, and note the sample time on the form. This creates a reference point for samples.
- 5) Complete the Chain of Custody for any samples delivered to a laboratory for analytical analysis.
- 6) Clean and maintain all equipment according to user manual.

Dry Weather Outfall Inspection/Sampling SOP

Table 2: Analytical Methods, Detection Limits, Hold Times, and Preservatives

Analyte or Parameter	Analytical Method ¹	Detection Limit	Max. Hold Time	Preservative/Cooling
Ammonia	EPA: 350.2 SM: 4500-NH3C	0.05 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2, none if analyzed immediately
Chlorine	SM: 4500-Cl G	0.02 mg/L	15 minutes	None
Conductivity	EPA: 120.1 SM: 2510B	0.2 µs/cm	28 days	Cool ≤6°C
Indicator Bacteria: <i>E.coli</i>	EPA: 1603 SM: 9221B, 9221F, 9223 B Other: Colilert, Colilert-18	EPA: 1 cfu/100mL SM: 2 MPN/100mL Other: 1 MPN/100mL	6 hours	Cool ≤10°C, 0.0008% Na ₂ S ₂ O ₃
Indicator Bacteria: Enterococcus	EPA: 1600 SM: 9230 C Other: Enterolert	EPA: 1 cfu/100mL SM: 1 MPN/100mL Other: 1 MPN/100mL	6 hours	Cool ≤10°C, 0.0008% Na ₂ S ₂ O ₃
Indicator Bacteria: Fecal coliform	SM: 9221E, 9222D	SM: 1.8 org/100mL	6 hours	Cool 4°C, 0.0008% Na ₂ S ₂ O ₃
Salinity	SM: 2520		28 days	Cool ≤6°C
Surfactants	SM: 5540-C	0.01 mg/L	48 hours	Cool ≤6°C
Temperature	SM: 2550B	Not applicable	Immediate	None
Total Nitrogen (TN) (methods are for TN and TKN, NO ₃ /NO ₂ which comprise TN)	TN SM: 4500 NC TKN EPA: 353-3 TKN SM: 4500 NH ₃ -H NO₃/NO₂ EPA: 353.2 NO₃/NO₂ SM: 4500NO ₃ -F	TN: 0.055 mg/L TKN EPA: 0.05 mg/L NO₃/NO₂: 0.005 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2

Notes:

Select meters/test kits that can read below the detection limit provided in the table.

Follow the instrumentation/test kit instructions for sampling.

¹SM = Standard Methods

Dry Weather Outfall Inspection/Sampling SOP

Form 3: Dry Weather Water Quality Sampling Form

Outfall ID:		Date:	
Outfall Location:		Inspector's Name:	
FOR ALL OUTFALLS			
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result	
<i>Uses a Field Meter</i>			
Temperature			
Salinity			
Specific Conductance			
Chlorine			
<i>Uses a Test Kit</i>			
Surfactant as MBAS			
Ammonia (NH ₃)			
<i>Uses bottles to be sent to lab (see Table 2 for method, transport, and hold times)</i>			
Sample Parameter	Time/Date	Laboratory	Result
<i>E.coli</i>			
FOR DISCHARGES TO IMPAIRED WATERS ONLY			
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result	
<i>Uses bottles to be sent to lab (see Table 2 for method, transport, and hold times)</i>			
Sample Parameter	Time/Date	Laboratory	Result
Fecal coliform <i>(discharges to fecal coliform impaired waters)</i>			
Total Nitrogen <i>(discharges to estuarine bioassessments or nitrogen impaired waters)</i>			

Appendix D

SOP for Illicit Discharge Source Investigation

Illicit Discharge Source Investigation SOP

Purpose of SOP

1. Once a potential illicit discharge has been identified during routine dry weather sampling or inspection, an investigation to **identify the source** of the illicit discharge must be conducted.
2. **Observations of flow** during dry weather conditions will assist with identifying the source of an illicit discharge.

Prior to the Leaving the Facility

1. **Check the weather**: The illicit discharge source investigation shall proceed only when **no more than 0.1 inches** of rainfall has occurred in the **previous 24-hour period** and no significant snow melt is occurring.
2. **Gather** all required equipment and materials:
 - Necessary Forms:
 - Form 1: Illicit Discharge Source Investigation (at outfall)
 - Form 2: Illicit Discharge Source Investigation (for each structure upstream from outfall)
 - Detailed map of stormwater drainage infrastructure
 - Pen

Illicit Discharge Source Investigation

1. Once a potential illicit discharge has been identified during routine dry weather sampling or inspection, **observe the outfall** under dry weather conditions.
2. **Record observations** about the possibility of an illicit discharge on **Form 1: Illicit Discharge Source Investigation (at outfall)**. Take photos and document on form.
3. If flow is present, **proceed to the first accessible upstream manhole or structure** to continue the investigation to the source of the flow.
4. At each structure, **record observations about all flow** from inlet pipes on **Form 2: Illicit Discharge Source Investigation** (for each structure upstream from outfall). Take photos and document on form. Note flow on stormwater map.
5. If an illicit discharge is identified and sampling and flow observations do not identify the source, **use alternative investigation techniques** (additional sampling, dye or smoke testing, television inspection, etc.) as needed to identify the source.
6. Once the source is identified, **notify the responsible entity** of the illicit discharge and encourage voluntary removal.
7. **Use existing regulations** to enforce the removal of the illicit discharge. Impose a compliance schedule and fees (if allowed).

Illicit Discharge Source Investigation SOP

Form 1: Illicit Discharge Source Investigation (at outfall)

Outfall ID:	Date:
Inspector's Name:	
Flow Present: Yes No	
Flow Description (circle): Trickle Moderate Substantial	
Notes (color, odor, trash, etc.):	
Possibility of Illicit Discharge? Yes No	Possible Sources:

Form 2: Illicit Discharge Source Investigation

(for each structure upstream from outfall or key junction structure)

Structure ID:	Date:	
Inspector's Name:		
Flow in Inlet Pipes? Yes No	Notes:	
List all inlet pipes with flow (if more space is required, use back of form)		
Pipe ID		Flow Description (circle): Trickle Moderate Substantial
		Notes (color, odor, trash, etc.):
		Possibility of Illicit Discharge? Yes No Possible Sources:
Pipe ID		Flow Description (circle): Trickle Moderate Substantial
		Notes (color, odor, trash, etc.):
		Possibility of Illicit Discharge? Yes No Possible Sources:
Pipe ID		Flow Description (circle): Trickle Moderate Substantial
		Notes (color, odor, trash, etc.):
		Possibility of Illicit Discharge? Yes No Possible Sources:
Pipe ID		Flow Description (circle): Trickle Moderate Substantial
		Notes (color, odor, trash, etc.):
		Possibility of Illicit Discharge? Yes No Possible Sources:

Appendix E

SOP for Dry Weather Key Junction Inspection/Sampling

Dry Weather Key Junction Screening SOP

Purpose of SOP

1. The inspection of key junction structures to assess the **condition of the structure**;
2. The inspection of key junction structures to assess the **possibility of illicit discharges**; and
3. The **collection of samples** during dry weather conditions.

Prior to the Leaving the Facility

1. **Check the weather**: Dry weather screening and sampling shall proceed only when no more than 0.1 inches of rainfall has occurred in the previous 24-hour period and no significant snow melt is occurring.
2. **Gather** all required equipment and materials:
 - Necessary Forms:
 - o Form 1: Key Junction Structure Description and Condition Inventory
 - o Form 2: Illicit Discharge Detection Inspection
 - o Form 3: Dry Weather Water Quality Sampling Form
 - Multi-meter for chlorine
 - Sample kits for ammonia and surfactants
 - Dipper with extension rod
 - Tape measure
 - Pen
 - Cooler with ice or ice packs to transport samples
3. **Calibrate** meters following methods in the instruction manuals.

In Field

1. **Observe** each key junction structure under dry weather conditions.
2. **Record observations** about the condition of the key junction structure on **Form 1: Key Junction Structure Description and Condition Inventory and Inspection**. Take photos and document on form.
3. **Record observations** about the possibility of an illicit discharge on **Form 2: Illicit Discharge Detection Inspection**. Take photos and document on form.
4. If flow is present, assign an ID to the flowing pipes on the site map. **collect samples** for analysis following procedures in **Table 1**. Follow hold times and instructions in **Table 2**. Record information in **Form 3**.
5. **Report** any signs of illicit discharges to your supervisor.

Table 2: Analytical Methods, Detection Limits, Hold Times, and Preservatives

Analyte or Parameter	Analytical Method ¹	Detection Limit	Max. Hold Time	Preservative/Cooling
Ammonia	EPA: 350.2 SM: 4500-NH3C	0.05 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2
Chlorine	SM: 4500-Cl G	0.02 mg/L	15 minutes	None
Surfactants	SM: 5540-C	0.01 mg/L	48 hours	Cool ≤6°C

Dry Weather Key Junction Screening SOP

Form 1: Key Junction Structure Description and Condition Inventory

Inspection Information					
Junction ID					
Associated Outfall ID					
Inspector's Name					
Date of Inspection					
Rainfall (in)	Last 24 hours:	Last 48 hours:			
Description of Key Junction Structure					
Type of Structure	Manhole	Catch Basin	Other: _____		
Condition of Structure	Good	Fair	Poor	Comments	Construction Material
Cover					
Frame					
Corbel					
Walls					
Floor					
Key Junction Damage (circle)	Spalling Cracking/Chipping Corrosion Other: _____				
Comments or any other non-illicit discharge concerns (e.g., trash or needed infrastructure repairs?):					

Dry Weather Key Junction Screening SOP

Form 2: Illicit Discharge Detection Inspection

Junction ID:		Date:	
Associated Outfall ID:		Inspector's Name:	
Flow Description			
Flow in Inlet Pipes? Yes No		Notes:	
List all inlet pipes with flow (if more space is required, use back of form)			
Pipe ID		Flow Description (circle): Trickle Moderate Substantial	
		Depth in Center of Flow (in.)	Width (in.)
Pipe ID		Flow Description (circle): Trickle Moderate Substantial	
		Depth in Center of Flow (in.)	Width (in.)
Physical Indicators (<i>all key structures</i>)			
Indicator	Description		
<input type="checkbox"/> Deposits and Stains (circle)	Oily	Flow Line	Paint Other:
<input type="checkbox"/> Pipe Benthic Growth (circle)	Brown	Orange	Green Other:
Physical Indicators (<i>flowing structures/pipes only</i>)			
Indicator	Description	Severity	Notes
Odor	<input type="checkbox"/> Sewage <input type="checkbox"/> Petroleum/Gas <input type="checkbox"/> Sulfide <input type="checkbox"/> Rancid/Sour Other: _____	<input type="checkbox"/> 1 – Faint <input type="checkbox"/> 2 – Easily detected <input type="checkbox"/> 3 – Noticeable from a distance	<i>Confirm the odor is coming from the discharge location and water and not the surrounding area. Avoid deeply inhaling odors as they may potentially be harmful vapors.</i>
	<input type="checkbox"/> Clear <input type="checkbox"/> Brown <input type="checkbox"/> Gray <input type="checkbox"/> Yellow <input type="checkbox"/> Green <input type="checkbox"/> Orange <input type="checkbox"/> Red <input type="checkbox"/> Other: _____	<input type="checkbox"/> 1 – Faint colors in sample bottle <input type="checkbox"/> 2 – Clearly visible in sample bottle <input type="checkbox"/> 3 – Clearly visible in the flow	<i>Color is defined by the tint or intensity of color observed</i>
Turbidity/ Cloudiness		<input type="checkbox"/> 1 – Slight <input type="checkbox"/> 2 – Cloudy <input type="checkbox"/> 3 – Opaque	<i>Turbidity or cloudiness is a measure of how easily light can penetrate through the sample.</i>
Floatables (other than trash)	<input type="checkbox"/> Sewage (toilet paper, etc.) <input type="checkbox"/> Suds <input type="checkbox"/> Petroleum/oil sheen Other: _____	<input type="checkbox"/> 1 – Few/slight; origin not obvious <input type="checkbox"/> 2 – Some; indications of origin <input type="checkbox"/> 3 – Some; origin clear	<i>- In some cases, surface sheens may be created by in-stream processes. A thick or swirling sheen with a gas-like odor may indicate an oil discharge. - Suds that break up quickly may simply indicate water turbulence. Suds with a strong organic/sewage odor may indicate sewage. Suds with a fragrant odor may indicate laundry water.</i>
Possibility of Illicit Discharge		Sum of Severity Indicators: _____	
<input type="checkbox"/> Unlikely	<input type="checkbox"/> Potential (two or more indicators)	<input type="checkbox"/> Suspect (one or more indicators with severity 3)	<input type="checkbox"/> Obvious
Comments/Possible Sources:			

Dry Weather Key Junction Screening SOP

Table 1: Sampling Protocol

General Sampling Protocols

- 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.

Sample Collection Protocols

- 1) Bring all materials and equipment including all forms, the cooler containing the sample bottles, and multi-meters to the site where the sample is going to be taken.
- 2) For any sample to be collected with a **multi-meter**, follow this protocol:
 - a. Turn on multi-meters and place the probe in the flow being careful not to let it rest on the bottom or become encased in sediment.
 - b. Once the numbers on the probe have stopped changing, record data from the multi-meters onto **Form 3: Dry Weather Water Quality Sampling Form**.
- 3) For any sample that must be collected by **bottle**, follow this protocol:
 - a. Put on clean, powder-free nitrile gloves and be careful not to touch anything other than the dippers or the sampling containers.
 - b. The second sampler should be prepared to open bottles and hand them to the first sampler when needed. The bottle caps should be left in the bags and not placed on the ground or other surface.
 - c. Keep hands away from the bottle opening to prevent contamination.
 - d. Collect the sample by placing the bottle in the main stream of flow, being careful not to allow the water to flow over your hands or the outside of the bottle first.
 - e. Do not overfill the bottle (only fill to about ½ inch from the top of the bottle) and do not dump any liquid from them as some of the bottles supplied by the lab have preservatives.
 - f. Once the sample bottle is filled, immediately hand the bottle to the second sampler to place and tighten the cap on the bottle.
 - g. Label sample bottle with location, date, and time.
 - h. Place the bottle in the plastic bag and immediately store it in the cooler before taking the next sample.
 - i. If the flow cannot be reached by the sampler, remove the dipper and extension rod from the sealed bag. Fill and rinse the dipper in the flow three times being careful not to disturb the sediment. Collect the sample in the dipper and carefully pour into the bottle following the protocol listed above.
- 4) Complete **Form 3: Dry Weather Water Quality Sampling Form** if analytical samples were collected, specify parameters, and note the sample time on the form. This creates a reference point for samples.
- 5) Complete the Chain of Custody for any samples delivered to a laboratory for analytical analysis.
- 6) Clean and maintain all equipment according to the user manual.

Dry Weather Key Junction Screening SOP

Form 3: Dry Weather Water Quality Sampling Form

Junction ID:	Date and Time:			
Associated Outfall ID:		Inspector's Name:		
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result		
		Pipe ID	Pipe ID	Pipe
	Units:			
<i>Uses a Field Meter</i>				
Chlorine				
<i>Uses a Test Kit</i>				
Surfactant as MBAS				
Ammonia (NH ₃)				

Junction ID:	Date and Time:			
Associated Outfall ID:		Inspector's Name:		
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result		
		Pipe ID	Pipe ID	Pipe
	Units:			
<i>Uses a Field Meter</i>				
Chlorine				
<i>Uses a Test Kit</i>				
Surfactant as MBAS				
Ammonia (NH ₃)				

Appendix F

SOP for Wet Weather Outfall Sampling

Wet Weather Outfall Sampling SOP

Purpose of SOP

- A **wet weather investigation** will be conducted for outfalls that have been identified by the Town of Abington as having a higher potential for illicit connections; and
- The investigation will include an **inspection** of stormwater drainage outfalls and the **collection of samples** during wet-weather induced flows to determine the presence of illicit discharges to the MS4.

Prior to the Leaving the Facility

1. **Check the weather:**
 - The storm event should be large enough to produce stormwater discharge.
 - Wet weather screening and sampling shall proceed when more than 0.1 inches of rainfall has occurred in the previous 24-hour period.
 - Sampling is recommended in the spring when groundwater levels are high.
2. **Gather** all required equipment and materials:
 - Necessary Forms:
 - Form 1: Wet Weather Illicit Discharge Detection Inspection
 - Form 2: Wet Weather Water Quality Sampling Form
 - Multi-meters for chlorine, conductivity, salinity, and temperature
 - Sample kits for ammonia and surfactants
 - Sampling bottles for *E. coli* analysis
 - Sampling bottles for fecal coliform and total nitrogen (*for discharges to impaired and TMDL waters only*)
 - Dipper with extension rod
 - Tape measure
 - Pen
 - Cooler with ice or ice packs to transport samples
3. **Calibrate** meters following methods in the instruction manuals.

In Field

1. **Observe** each outfall under wet weather conditions. If an outfall is inaccessible or submerged, proceed to the first accessible upstream manhole or structure.
2. **Record observations** about the general condition of the structure and the possibility of an illicit discharge on **Form 1: Wet Weather Illicit Discharge Detection Inspection**. Take photos and document on form.
3. **Collect samples** for analysis following procedures in **Table 1**. Follow hold times and instructions in **Table 2**. Record information in **Form 2: Wet Weather Water Quality Sampling Form**.
4. **Report** any signs of illicit discharges to your supervisor.

Wet Weather Outfall Sampling SOP

Form 1: Illicit Discharge Detection Inspection

Outfall ID:		Date:	
Outfall Location:		Inspector's Name:	
Indicators (all outfalls with indicators)			
Indicator	Description (circle all that apply)		
<input type="checkbox"/> Deposits and Stains	Oily	Flow Line	Paint Other:
<input type="checkbox"/> Poor Pool Quality (circle)	Odors	Colors	Oil Sheen Suds Algae Floatables Other:
<input type="checkbox"/> Pipe Benthic Growth (circle)	Brown	Orange	Green Other:
Flow Description			
Flow Present:	Yes	No	Notes:
Flow Description:	Trickle	Moderate	Substantial
		Flow Depth:	
Physical Indicators (flowing outfalls)			
Indicator	Description	Severity Indicators	Notes
Odor	<input type="checkbox"/> Sewage	<input type="checkbox"/> 1 – Faint (unclear source) <input type="checkbox"/> 2 – Easily detected <input type="checkbox"/> 3 – Noticeable from a distance	<i>Confirm the odor is coming from the discharge location and water and not the surrounding area. Avoid deeply inhaling odors as they may potentially be harmful vapors.</i>
	<input type="checkbox"/> Petroleum/Gas		
	<input type="checkbox"/> Sulfide		
	<input type="checkbox"/> Rancid/Sour		
	<input type="checkbox"/> Other: _____		
Color	<input type="checkbox"/> Clear <input type="checkbox"/> Brown	<input type="checkbox"/> 1 – Faint colors in sample bottle <input type="checkbox"/> 2 – Clearly visible in sample bottle <input type="checkbox"/> 3 – Clearly visible in the flow	<i>Color is defined by the tint or intensity of color observed.</i>
	<input type="checkbox"/> Gray <input type="checkbox"/> Yellow		
	<input type="checkbox"/> Green <input type="checkbox"/> Orange		
	<input type="checkbox"/> Red <input type="checkbox"/> Other: _____		

Turbidity/ Cloudiness		<input type="checkbox"/> 1 – Slight <input type="checkbox"/> 2 – Cloudy <input type="checkbox"/> 3 – Opaque	<i>Turbidity or cloudiness is a measure of how easily light can penetrate through the sample.</i>
Floatables (other than trash)	<input type="checkbox"/> Sewage (toilet paper, etc.) <input type="checkbox"/> Suds <input type="checkbox"/> Petroleum/oil sheen <input type="checkbox"/> Other: _____	<input type="checkbox"/> 1 – Few/slight; origin not obvious <input type="checkbox"/> 2 – Some; indications of origin <input type="checkbox"/> 3 – Some; origin clear	<i>- In some cases, surface sheens may be created by in-stream processes. A thick or swirling sheen with a gas-like odor may indicate an oil discharge.</i> <i>- Suds that break up quickly may simply indicate water turbulence. Suds with a strong organic/sewage odor may indicate sewage. Suds with a fragrant odor may indicate laundry water.</i>
Possibility of Illicit Discharge			Sum of Severity Indicators: _____
<input type="checkbox"/> Unlikely	<input type="checkbox"/> Potential (two or more indicators)	<input type="checkbox"/> Suspect (one or more indicators at severity 3)	<input type="checkbox"/> Obvious
Comments/Possible Sources:			

Wet Weather Outfall Sampling SOP

Table 1: Sampling Protocol

General Sampling Protocols

- 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.

Sample Collection Protocols

- 1) Bring all materials and equipment including all forms, the cooler containing the sample bottles, and multi-meters to the site where the sample is going to be taken.
- 2) For any sample to be collected with a **multi-meter**, follow this protocol:
 - a. Turn on multi-meters and place the probe in the flow being careful not to let it rest on the bottom or become encased in sediment.
 - b. Once the numbers on the probe have stopped changing, record data from the multi-meters onto **Form 2: Wet Weather Water Quality Sampling Form**.
- 3) For any sample that must be collected by **bottle**, follow this protocol:
 - a. Put on clean, powder-free nitrile gloves and be careful not to touch anything other than the dippers or the sampling containers.
 - b. The second sampler should be prepared to open bottles and hand them to the first sampler when needed. The bottle caps should be left in the bags and not placed on the ground or other surface.
 - c. Keep hands away from the bottle opening to prevent contamination.
 - d. Collect the sample by placing the bottle in the main stream of flow, being careful not to allow the water to flow over your hands or the outside of the bottle first.
 - e. Do not overfill the bottle (only fill to about ½ inch from the top of the bottle) and do not dump any liquid from them as some of the bottles supplied by the lab have preservatives.
 - f. Once the sample bottle is filled, immediately hand the bottle to the second sampler to place and tighten the cap on the bottle.
 - g. Label sample bottle with location, date, and time.
 - h. Place the bottle in the plastic bag and immediately store it in the cooler before taking the next sample.
 - i. If the flow cannot be reached by the sampler, remove the dipper and extension rod from the sealed bag. Fill and rinse the dipper in the flow three times being careful not to disturb the sediment. Collect the sample in the dipper and carefully pour into the bottle following the protocol listed above.
- 4) Complete **Form 2: Wet Weather Water Quality Sampling Form** if analytical samples were collected, specify parameters, and note the sample time on the form. This creates a reference point for samples.
- 5) Complete the Chain of Custody for any samples delivered to a laboratory for analytical analysis.
- 6) Clean and maintain all equipment according to user manual.

Wet Weather Outfall Sampling SOP

Table 2: Analytical Methods, Detection Limits, Hold Times, and Preservatives

Analyte or Parameter	Analytical Method ¹	Detection Limit	Max. Hold Time	Preservative/Cooling
Ammonia	EPA: 350.2 SM: 4500-NH3C	0.05 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2, none if analyzed immediately
Chlorine	SM: 4500-Cl G	0.02 mg/L	15 minutes	None
Conductivity	EPA: 120.1 SM: 2510B	0.2 μs/cm	28 days	Cool ≤6°C
Indicator Bacteria: <i>E.coli</i>	EPA: 1603 SM: 9221B, 9221F, 9223 B Other: Colilert, Colilert-18	EPA: 1 cfu/100mL SM: 2 MPN/100mL Other: 1 MPN/100mL	6 hours	Cool ≤10°C, 0.0008% Na ₂ S ₂ O ₃
Indicator Bacteria: Enterococcus	EPA: 1600 SM: 9230 C Other: Enterolert	EPA: 1 cfu/100mL SM: 1 MPN/100mL Other: 1 MPN/100mL	6 hours	Cool ≤10°C, 0.0008% Na ₂ S ₂ O ₃
Indicator Bacteria: Fecal coliform	SM: 9221E, 9222D	SM: 1.8 org/100mL	6 hours	Cool 4°C, 0.0008% Na ₂ S ₂ O ₃
Salinity	SM: 2520		28 days	Cool ≤6°C
Surfactants	SM: 5540-C	0.01 mg/L	48 hours	Cool ≤6°C
Temperature	SM: 2550B	Not applicable	Immediate	None
Total Nitrogen (TN) (methods are for TN and TKN, NO ₃ /NO ₂ which comprise TN)	TN SM: 4500 NC TKN EPA: 353-3 TKN SM: 4500 NH ₃ -H NO₃/NO₂ EPA: 353.2 NO₃/NO₂ SM: 4500NO ₃ -F	TN: 0.055 mg/L TKN EPA: 0.05 mg/L NO₃/NO₂: 0.005 mg/L	28 days	Cool ≤6°C, H ₂ SO ₄ to pH <2

Notes:

Select meters/test kits that can read below the detection limit provided in the table.

Follow the instrumentation/test kit instructions for sampling.

¹SM = Standard Methods

Wet Weather Outfall Sampling SOP

Form 2: Wet Weather Water Quality Sampling Form

Outfall ID:	Date:		
Outfall Location:	Inspector's Name:		
FOR ALL OUTFALLS			
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result	
<i>Uses a Field Meter</i>			
Temperature			
Salinity			
Specific Conductance			
Chlorine			
<i>Uses a Test Kit</i>			
Surfactant as MBAS			
Ammonia (NH ₃)			
<i>Uses bottles to be sent to lab (see Table 2 for method, transport, and hold times)</i>			
Sample Parameter	Time/Date	Laboratory	Result
<i>E.coli</i>			
FOR DISCHARGES TO IMPAIRED WATERS ONLY			
Sample Parameter	Field Meter/Test Kit Name	Field Screening Result	
<i>Uses bottles to be sent to lab (see Table 2 for method, transport, and hold times)</i>			
Sample Parameter	Time/Date	Laboratory	Result
Fecal coliform <i>(discharges to fecal coliform impaired waters)</i>			
Total Nitrogen <i>(discharges to estuarine bioassessments or nitrogen impaired waters)</i>			

Appendix G

Illicit Discharge Records

Appendix H

IDDE Employee Training Records

