

ILLICIT DISCHARGE DETECTION & ELIMINATION PLAN

Smithfield Township, Monroe County, Pennsylvania



Prepared by:



May 2022

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Introduction

Smithfield Township is required under its MS4 (Municipal Separate Storm Sewer System) program to develop an Illicit Discharge Detection and Elimination (IDDE) Plan. The purpose of the plan is to satisfy the requirements of Minimum Control Measure #3 under the MS4 program. The IDDE plan outlines the procedures to detect and remove illicit discharges to the MS4.

The Smithfield Township MS4 consists of the conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and storm drains or storm sewer system.

Illicit Discharges include any discharge to the MS4 this is prohibited under local, state, or federal statutes, ordinances, codes, or regulations. This includes all non-stormwater discharges except discharges pursuant to an NPDES (National Pollutant Discharge Elimination System) permit and discharges that are exempt.

Exempt Discharges

Exempt, as defined in US EPA (EPA 833-F-00-007), discharges include the following:

- Water line flushing
- Diverted stream flows
- Uncontaminated ground water infiltration
- Discharges from potable water sources
- Air conditioning condensation
- Springs
- Footing drains
- Flows from riparian habitats and wetlands
- Street wash water.
- Landscape irrigation
- Rising ground waters
- Uncontaminated pumped ground water
- Foundation drains
- Irrigation water
- Water from crawl space pumps
- Lawn watering, individual residential car washing
- De-chlorinated swimming pool discharges

(The illicit discharge detection and elimination program does not need to address the above categories of non-stormwater discharges or flows unless the Township identifies them as significant contributors of pollutants to its MS4)

Identification of Priority Areas

Priority areas are generally selected based on the likelihood of illicit connections, which typically are found in areas with older sanitary sewer lines (historic industrial areas and older residential development).

Illicit discharge detection will be performed in the priority areas, as well as other areas of the Township, as part of the MS4 outfall inspections and during normal daily activities of the Township's public works staff.

Procedures for Identifying Illicit Discharges / Documentation

The Township's public works staff will identify illicit discharges primarily visually through direct observation of illegal discharges, connections or suspect discharges to the stormwater system. Illicit discharge identification during the MS4 outfall inspections will be through visual observations as well as a combination of field and laboratory water quality testing. Illicit discharges can be documented on the form included as Attachment II. Indications of an illicit discharge may include unnatural color, odor, turbidity, surface sheen, floating material and field or laboratory analysis.

Illicit discharge identification may include, but is not limited to, inlet inspections, investigation of contributing areas when suspect pollutants are identified in a stormwater outfall, interviews of residents or businesses near an identified illicit discharge, dye or smoke tests and video inspections.

All incidents and follow up investigations shall be fully documented and kept on file at the Township offices. An Illicit Discharge Tracking Sheet is enclosed as Attachment II.

Procedures for Eliminating Illicit Discharges

When an illicit discharge is identified the appropriate Township staff will work with the discharger to find a solution to the problem and notify them to remove / correct the illicit connection. Although not mandatory or required, this may include offering limited technical assistance for restoration activities.

If deemed appropriate, particularly when voluntary compliance is not timely, the discharger will be notified of an illicit discharge violation and legal action will be initiated through the appropriate local, state, and federal agencies.

Attachment I

Water Quality Contacts

Illicit Discharges

Water Quality Hotlines – MS4 Program

Residents are often the first to notice pollution problems in their communities. These ‘illicit’ discharges can originate from various sources and contribute to degradation of local water ways. The following are situations which should be reported and who to contact:

Violation	Who to Contact
Dumping of petroleum products, chemicals, hazard materials to the ground surface or stormwater facilities	Pennsylvania Department of Environmental Protection: (484) 250 5900
Spills of petroleum products, chemicals or hazard materials	Pennsylvania Department of Environmental Protection: (484) 250 5900
Sediment leaving a construction site	Monroe County Conservation District: (570) 629 3060
Pollutants in Waterway	Pennsylvania Department of Environmental Protection: (484) 250 5900
Broken or leaking water mains	Smithfield Township: (570) 223 5082
Sewage effluent discharges	Smithfield Township: (570) 223 5082
Fish kills	Pennsylvania Fish Commission: (717) 626 0228 - or - Pennsylvania Department of Environmental Protection: (484) 250 5900

Attachment II

Illicit Discharge Tracking Sheet

Illicit Discharge Tracking Sheet

Incident ID:				
Responder Information				
Information taken by:			Incident date:	
Time:			Precipitation (inches) in past 24-48 hrs:	
Reporter Information				
Incident time:			Incident date:	
Contact information (<i>optional</i>):				
Incident Location (<i>complete one or more below</i>)				
Latitude and longitude:				
Stream address or outfall #:				
Closest street address:				
Nearby landmark:				
Primary Location Description		Secondary Location Description:		
<input type="checkbox"/> Stream corridor <i>(In or adjacent to stream)</i>		<input type="checkbox"/> Outfall	<input type="checkbox"/> In-stream flow	<input type="checkbox"/> Along banks
<input type="checkbox"/> Upland area <i>(Land not adjacent to stream)</i>		<input type="checkbox"/> Near storm drain	<input type="checkbox"/> Near other water source (storm water pond, wetland, etc.):	
Narrative description of location:				
Upland Problem Indicator Description				
<input type="checkbox"/> Dumping		<input type="checkbox"/> Oil/solvents/chemicals	<input type="checkbox"/> Sewage	
<input type="checkbox"/> Wash water, suds, etc.		<input type="checkbox"/> Other: _____		
Stream Corridor Problem Indicator Description				
Odor	<input type="checkbox"/> None	<input type="checkbox"/> Sewage	<input type="checkbox"/> Rancid/Sour	<input type="checkbox"/> Petroleum (gas)
	<input type="checkbox"/> Sulfide (rotten eggs); natural gas	<input type="checkbox"/> Other: Describe in "Narrative" section		

Appearance	<input type="checkbox"/> "Normal"	<input type="checkbox"/> Oil sheen	<input type="checkbox"/> Cloudy	<input type="checkbox"/> Suds
	<input type="checkbox"/> Other: Describe in "Narrative" section			
Floatables	<input type="checkbox"/> None:	<input type="checkbox"/> Sewage (toilet paper, etc)	<input type="checkbox"/> Algae	<input type="checkbox"/> Dead fish
	<input type="checkbox"/> Other: Describe in "Narrative" section			
Narrative description of problem indicators:				
Suspected Violator (name, personal or vehicle description, license plate #, etc.):				
Investigation Notes				
Initial investigation date:		Investigators:		
<input type="checkbox"/> No investigation made		Reason:		
<input type="checkbox"/> Referred to different department/agency:		Department/Agency:		
<input type="checkbox"/> Investigated: No action necessary				
<input type="checkbox"/> Investigated: Requires action		Description of actions:		
Hours between call and investigation:		Hours to close incident:		
Date case closed:				
Notes:				

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Reporter Information				
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Notes:				