Webinar Training Series



#### Illicit Discharge Detection and Elimination Requirements and Best Practices

January 19, 2017 /// 10:30 a.m. – 11:30 a.m. (Eastern)



## **Questions?**

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#### Annual Southeast Regional Stormwater Seminar **Emerging Trends in Stormwater BMPs** March 31, 2017 Atlanta, GA <u>www.seswa.org/seminars</u>

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#### **Today's Presenters**





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#### Agenda

- o IDDE Requirements
- Case Study Charlotte/Mecklenberg
   County
- Additional IDDE Approaches/Techniques
- $\circ$  Takeaways





## Typical IDDE Requirements

- Develop a map of the MS4 that locates all major MS4 outfalls and names of receiving waters
- Effectively prohibit discharges of non-stormwater to the MS4 through the use of an ordinance or other regulatory mechanism, and provide for enforcement procedures and actions
- Develop and implement a plan to detect and address non-stormwater discharges
- Inform public employees, businesses, and the general public of the hazards associated with illegal discharges and improper disposal of waste
- Annual reporting requirements with metrics and corrective actions



#### General Differences Among State General Permits

- Outfall mapping specifics
- Enforcement Response Plans vs developing/implementing enforcement procedures
- Rationale statements
- Requirements for the development of formal procedures for various program aspects
- Development of a mechanism for reporting by the public
- Training/education requirements for municipal staff and others



#### Unique IDDE Requirements

- Ordinance must prohibit contamination of stormwater runoff from "hotspots" TN
- Requirement for evaluation of the success of the program and whether meeting measurable goals – MS
- Dry weather screening program requiring % of outfalls screened per year AL
- Identification of priority areas for more frequent screening SC
- Foster interagency coordination of hazardous waste or material spills response and cleanup – TN
- Address non-stormwater discharges that are defined as significant contributors (non-commercial/charity car washes, water line flushing, etc.) – AL/MS

#### Focus is to <u>detect and eliminate</u> illicit discharges, <u>no</u> prescriptive or "one size fits all" solution





# Charlotte-Mecklenburg Storm Water Services

# IDDE PROGRAM



#### It All Began With Smelly Creeks



WCTU-TV

Declared

Insolvent

By JOE FLANDERS

vision station WCT TV (Channel 36) today was





Wayne R. Chapman, makery control and Dr. Edward

THE CHARLOTTE NEWS

A Tip: Don't Go Near The Water

**Evening Prayer** 

Front Page of Charlotte News – September 15, 1969

Sewer Named Sugar

Follows Meeting

Approval

You Can Learn o Avoid A Wreck

January 1970: Mecklenburg County's Water Quality Program was established in response to citizen complaints regarding sewer discharges to urban streams.

- $\triangleright$ September 1971: Surface Water Pollution Control Ordinance adopted and oversight board established.
- $\triangleright$ July 1974: Lake and stream monitoring programs established countywide.
- $\geq$ September 1986: Cooperative working agreement with the State (DWQ) for the protection of water quality.
- $\triangleright$ July 1993: City of Charlotte Phase I Permit became effective.
- $\geq$ August 2005: Mecklenburg County Phase II Permit became effective.

Catch Any Fish In Sugar? You Can Forget About It



3,000 stream miles 200 miles of lakeshore 529 sq. miles of land area





#### Water Quality Stream Use-Support Index



Stream Use-Support Index (SUSI)

Sub-Indices
 Fecal Coliform
 Total Phosphorus
 CMANN
 Metals
 Biological/Habitat
 24 Monitoring Sites

# Fecal Coliform Sub-Index



#### **Expical Illicit Discharges** Observed in Charlotte, NC

NOV 24 2003

#### **Typical lifteit Discharges Observed in Charlotte, N**C







**IDDE Tool Box** >MONTHLY MONITORING **CITIZENS REQUEST FOR SERVICE >IDEP** >CMANN **>HOTSPOTS >DYE TESTS >TV INSPECTIONS STREAM WALKS SEPTIC SYSTEM EVALUATIONS MST** >AERIAL INFRARED SURVEYS >OPTICAL BRIGHTNERS >HUMAN SOURCED CHEMICALS (CAFFEINE, COTININE)



## **Tracking Illicit Discharges and Connections to a Source Through Bacteria Sampling**



#### **Process for Narrowing Search Area:**

• Fixed interval monitoring reveals an exceedance of the Action Level for fecal coliform bacteria at monitoring site #1.

• Short term monitoring is performed at monitoring sites 1 through 6 to verify the pollution problem (results are shown above).

• Short term monitoring data reveals that the Action Level was not exceeded in two tributaries (#3 and #5) and two other monitoring points upstream (#4 and #6), thus allowing the search to be narrowed to the area shown in red



#### Why We Walk..... Purpose of Stream Walking

## 1. Conduct Outfall Inventory and Reinspection

●00000 Verizon 중 1:29 PM	6 💼 +
Cancel	
Feature Type	
Time and Date	٥
Outfall Type	٥
Outfall Material	٥
Outfall Shape	0
Endwall Material	٥
Outfall Location	٥
Is structure functioning?	٥
depth	٥
diameter	0
rise	٥
span	٥
length	٥
width	٥

# 2. Illicit Discharge Detection and Elimination (IDDE)

Dry Weather Flow?
Sample ID
Flow Rate
Temperature
Dissolved Oxygen
ph
conductivity

	1 Al	Miles.		
the second second			allan	
12			al.	
1		Chinese of the second	规公	
			1.00	
	N ES	17	and and a	
	286	1.40		

## 3. To Collect other Useful Data







Measure Area Measure areas of polygons

> Collect Add new features to the map

Ŷ

•••• Verizon		* 95% <b></b> -
Cancel	Feature Type	Done
Referen	ce Reach	
Storm W	/ater Outfall	~
Fecal Co	oliform Sample	
Problem	l	
Stream I	Blockage	
Wetland		
Severe E	Bank Erosion	
Private A	Aerial	

Contract Stract Hard	A au
P. S. T. T.	
The second second second	110
●●●○○ Verizon 중 4:46 PM	5
Cancel	
City Streamwalks FY16	17
Feature Type	
Storm Water Outfall	
Time and Date	0
Outfall Type	
Outfall Material	
Outfall Shape	
Endwall Material	
Outfall Location	$\overline{\mathbf{O}}$
diameter	



## FY16 Stream Walk Stats

	Description	Number
ALC: N	Number of streams assessed	687
	Number of steam miles assessed	229.32
10	Number of six square mile sub-basins assessed	21
Ę	Total Number of GPS <sup>d</sup> locations	766
	Number of inspections conducted (outfalls)	702
	Number of new outfalls inventoried	260
ALM N	Number of previously-identified outfalls field QC'd	506
11111	Number of samples collected (Fecal and TPhos)	360 Fecal, 15 TPhos.
R	Number of dry weather flows detected	87
5	Number of dry weather flows sampled	15
	Number of problems detected	31
	Number of Stream blockages	16
	Number of areas of SEVERE erosion	11
	Number of reference reaches identified	5
	Number of wetlands identified	13
1.00	Number of NOVs or Notice of Deficiencies issued	2 NOVs
	Number of illicit discharges and/or connections detected under this program	5
5	GIS map of inspection sites	See attached appendices.
A RAY WINN WAS AND	Findings and recommendations	<ol> <li>Averaged 0.156 problems per stream mile</li> <li>Recommend that future staff training focus on standardization of data collection.</li> </ol>

## Illicit Discharge Elimination Program

- Business Corridor Inspections
- Minor Outfall Inspections (<36")</li>
- Multi-Family Community Inspections
- Basin Scale Investigations
- TMDL Watershed Basins
- Watershed Recovery Plan Support

## Service Requests/Citizen Reports



# FY2016 Summary

#### Charlotte NPDES MS4 Program Service Requests, and Emergency Response FY2016 Program Summary

Number of Service Requests 1994 - 2016	10,537
Number of Service Requests FY2016	476
Service Request Type	Accidental Spill – 49 Algae Bloom – 5 Fish Kill – 4 Discharge/Dumping – 237 Buffer Disturbance – 20 Erosion – 12 Illicit Connection – 3 No Incident Identified - 87 Unspecified/Other – 25 Natural Occurrence – 10 Unknown - 15
Service Request – Material Type	Chemical – 13 Concrete – 10 Cooking Oil – 15 Automotive Fluids – 61 Paint – 16 Sediment – 20 Sewage – 80 Solid Waste – 29 Wastewater/Wash Water - 28 Buffer – 18 Other/Unknown – 68 None/Natural Conditions – 99 Allowable Discharge - 10
Number of Follow-up Field Inspections	201
Emergency Responses during FY2016	43
No. of SSOs found through service requests	80
NOVs Issued	107
a a a a a a a a	rante altran

#### **NOV/Penalty Flowchart**



#### **Documentation of Activities**

#### Cityworks

Inbox Reques	st Activity Worl	k Order GIS Se	arch Reports	Calen	idar Favorites Help
🗸 Inspection 🗸 Vie	ew 🕶 🖂 🔒 🔚 Sar	ve 💞 Close	Clear 🧭 🤉	*	a de la companya de l
	1	ation			
		ation			Summary
Template Type: Activity ID(s):	General Inspection	•			Comments 1: Spidel investigated Sugar Creek Charter School for the dumpin of paint and washing materials. A paint crew from A&K Painting working as a contractor at Sugar Creek Charter School was
Location Name:	Sugar Creek Charter Scho	- 0			observed by the general contractor cleaning their paint supplies
Address/Location:					Comments 2: and buckets out in the parking lot behind the school. No storm drain was effected. The general contractor that observed the s
Basin No:		District:	South Catawba	•	occur was Mr. James Dwy from Edison Foard Inc (mobile - 704-363-0349). Mr. Dwy informed Spidel that 2-5 gal. buckets
Municipality:	Charlotte	<ul> <li>Resp. P Name:</li> </ul>	A&K Painting		Comments 3: of water, 4 paint brushes and 4 rollers were deaned and then improperly dumped on the parking lot.
Resp. P Contact:	Mike - 704-521-8003	Resp. P Address:	9929 John Price Road	d, Charl	······································
X:	1,463,23	36 Y:	5	54,081	Cond. Score: 0
	St	atus			
Initiated Date:	8/27/2012 4:39 PM		SPIDEL, RYAN		Assets
Priority:		Completed By:		-	Highlight Get from Map History Remove Asset Costs
Status:	To Close	Submit To:	John McCulloch	-	
Activity Type:	Service Request	<ul> <li>Activity Stage:</li> </ul>	Initial	•	COUNTYBOUNDARY
Sample ID(s):		Customer:	Phase 1	-	Id 0
Actual Start:	8/16/2012 3:00 PM	Actual Finish:	8/16/2012 3:20 PM		
Next Activity:	Ē	<b>a</b>			
Probl. Found:		1 Prob. Resolved:		1	
Activity(s):		NOV(s):			
Request:	532 Op	en SR			
Closed By:		Date Closed:			
	Ger	neral		<u>^</u>	
Incident type	Discharge/dump			• /	
Media impacted	Road/parking lot/driveway		]	• /	
Material released	Paint			• /	
Investigation	Physical			- /	
methods used					
Amount spilled	Gallons			• •	
10					
Land use type	School			- /	
for activity location					
-	Aquatic Li	fe Impacts		<b>^</b>	
Start G Inbox				Dever	int - [ IN #E1E2 Connerol Inc



## Original Approach

- Portable spectrophotometer/dip strips
- $\circ$  72 hours or greater with < 0.1" of precipitation
- Grab sample tested for chemical attributes
- Between 4 hours and 24 hours later run second grab for the same analytes

#### **Physical Attributes**

#### **Chemical Attributes**

- Color
- $\circ$  Odor
- Deposits and stains
- Floatable matter
- Temperature
- o Turbidity
- o Grease/Oil

• Chlorine

pН

0

- Copper
- Phenols
- Surfactants





## Original Approach

- Identify typical allowable ranges
- Interpret screening data
- Indicative of sanitary sewage

<b>Chemical Parameter</b>	Allowable Range/Limit
рН	6.0 - 9.0
Chlorine	0.0 – 0.5 mg/L
Copper	0.0 – 0.5 mg/L
Phenol	0.0 – 0.399 mg/L
Surfactant	0.0 – 0.6 mg/L

WATER QUALITY INFORMATION:								
SAMPL	.E 1		SAMPLE 2			ILLICIT INVESTIGATION SAMPLE		
SAMPLE DATE:	7/14/2004		SAMPLE DATE:	7/14/2004		SAMPLE DATE:	7/16/2004	
Chemical Properties			Chemical Properties			Chemical Properties		
pH:	6.2		pH:	6.13		pH:	6.9	
CHLORINE:	0.71	mg/L	CHLORINE:	0.76	mg/L	CHLORINE:	0.72	mg/L
COPPER:	0.03	mg/L	COPPER:	0.05	mg/L	COPPER:	0.13	mg/L
PHENOLS:	0.11	mg/L	PHENOLS:	0.09	mg/L	PHENOLS:	0.13	mg/L
SURFACTANTS:	0.11	mg/L	SURFACTANTS:	0.12	mg/L	SURFACTANTS:	0.09	mg/L
FLUORIDE:	0.16	mg/L	FLUORIDE:	0.18	mg/L	FLUORIDE:	0.14	mg/L
AMMONIA/POTASSIUM			AMMONIA/POTASSIUM			AMMONIA/POTASSIUM		
RATIO:	0.89	mg/L	RATIO:	0.81	mg/L	RATIO:	0.79	mg/L
Physical Properties			Physical Properties			Physical Properties		
TEMPERATURE:	22.2	DEG. C	TEMPERATURE:	19.00	DEG. C	TEMPERATURE:	21.30	DEG. C
TURBIDITY:	Yes		TURBIDITY:	Yes		TURBIDITY:	Yes	
OIL SHEEN:	No		OIL SHEEN:	No		OIL SHEEN:	No	
SCUM:	No		SCUM:	No		SCUM:	No	
FLOW ODOR:	Yes		FLOW ODOR:	Yes		FLOW ODOR:	Yes	
FLOW COLOR:	Cloudy		FLOW COLOR:	Cloudy		FLOW COLOR:	Cloudy	
FLOW RATE:	Stream		FLOW RATE:	Stream		FLOW RATE:	Stream	

#### Fixed Station Illicit Detection



Spartanburg County









#### Fixed Station Illicit Detection



#### Fixed Station Illicit Detection


## Float Mapping

- Reedy River Watershed
  - o 240 square miles
  - o 40 stream miles
- Evaluate tributaries and point sources
- Prioritize watersheds or outfalls of concern
- Mobile real-time (20 seconds) surrogate and grab sample assessment



# Float Mapping

- Paddle main-stem of the Reedy River
  - $\circ$  40 miles
  - $\circ$  5 days
- Sonde Parameters:
  - $\circ$  Turbidity
  - Specific Conductivity
  - o pH
  - Dissolved Oxygen
  - o Temperature
- Used Garmin GPS to spatially identify location
- Floated during dry weather periods



#### Reedy River IDDE Float Mapping - September 22, 2014



## **IDDE** Prioritization

- Second Permit Term
- Prioritize Areas of Risk

Phase	Screening Point(s)	Timeframe *	
	IDDE-1		
А	IDDE-2	2015	
	IDDE-3		
В	IDDE-4	2016	
В	IDDE-5	2016	
	IDDE-6		
С	IDDE-7	2017	
	IDDE-8		
	IDDE-9	2019	
	IDDE-10	2018	



## **IDDE Tracking**



Smoke Testing

Dye Testing

**Robotic Crawler** 



#### Reference

Journal of Environmental Management 152 (2015) 241-250



Review

#### Contamination of stormwater by wastewater: A review of detection methods



#### Oleksandr Panasiuk<sup>\*</sup>, Annelie Hedström, Jiri Marsalek, Richard M. Ashley, Maria Viklander

Department of Civil, Environmental and Natural Resources Engineering, Luleå University of Technology, 97187 Luleå, Sweden

#### ARTICLE INFO

Article history: Received 10 September 2014 Received in revised form 19 January 2015 Accepted 31 January 2015 Available online 4 February 2015

Keywords: Stormwater contamination Detection of wastewater Indicator parameters Chemical and microbiological markers

#### ABSTRACT

Even in separate sewer systems, wastewater may find its way into the receiving waters through stormwater sewers. The main reasons for this are cross-connections, illicit connections, overflows and leakages through broken sewers. Such discharges may affect receiving water quality and increase risks to public health and aquatic organisms. Detecting wastewater contamination and locating its points of ingress into storm sewer systems can be a challenging task, which should be addressed using proper methods and indicator parameters. A number of detection methods have already been proposed in this area, yet there is a lack of a general overview of such methods. This literature review summarizes and evaluates the methods used for detecting wastewater in stormwater, including those recently developed. The advantages, weaknesses and limitations of individual methods are discussed. It is concluded that while no single method can as yet produce results in a precise, fast and inexpensive way, the use of human waste specific chemical and microbiological markers, and their innovative sampling, offer the way forward. Guidance for selecting the most effective combinations of detection methods, under specific conditions, is also provided.

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## IDDE Enforcement



# MS4 Reporting

#### $\circ \ \ \text{Illicit Detection}$

Illicit
Documentation/
Metrics

- Illicit Tracking
- Enforcement

Table 4. Summary of 2007 Permit, Year 8 SWMP Activities					
Annual Report Section	Activity Description	Number of Activities Accomplished	Comments		
3.4.2	Illicit Discharge Detection and Elimination	37 reports of illicit discharges logged; 22 NOVs issued.	Investigation details can be found in Appendix 4, Section 2		
3.4.3	Illegal Dumping and Roadside Litter	2,248 dumping and litter complaints; 1,402,990 lbs of litter and debris collected and recycled.	Details of complaints can be found in Table 8		
3.4.4	Welcome Creek IDDE Investigation	118 Outfalls investigated, 76 Manholes investigated, 30 aerial and in-stream sewer crossings investigated.	1 illicit found and repaired		
3.4.5	Float Mapping	Close to 50 miles of streams floated; 19 POIs, 1 potential illicit discharge.	Details can be found in Appendix 4, Sections 4 and 5		
3.4.6	Septic Tank Analysis	302 septic tanks added to database.			

#### **IDDE** Takeaways

- Don't overcomplicate.... technology not always needed
- Training/Hotline
  - o Staff
  - o Public
- River/creek illicit = significant
- Stream walks/float mapping
- Sanitary sewer #1 culprit
- Be proactive, not just reactive







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