

# Londonderry Township

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## *MCM #3: Illicit Discharge Detection and Elimination Minimum Measures*

- **Objective1:** Maintain a written procedure for IDD&E by:
  - o **Objective1A:** Identify priority areas.
  - o **Objective1B:** Determine procedures for screening outfalls in priority areas, once determined, identify source, and determine how to eliminate.
  - o **Objective1C:** Maintain procedures to handle sewage disposal systems as the cause for an illicit discharge.
  - o **Objective1D:** Gain access to private property to inspect outfalls.
  - o **Objective1E:** Procedures for program documentation, evaluation and assessment.
  - o **Objective1F:** Procedures for addressing information, or complaints received from the public.
- **Objective2:** Develop and maintain Urbanized Area map and locations of outfalls and observation points.
- **Objective3:** Expand map to throughout MS4 jurisdiction; include entire storm sewer collection system owned and maintained by Londonderry Township, additionally include privately owned components.
- **Objective4:** Conduct dry weather screenings of the MS4 outfalls to evaluate the presence of illicit discharges. If detected, follow procedures outlined in Objective1.
- **Objective5:** Maintain and update Stormwater Management Ordinance/Standard Operating Procedure in order to enforce SWMP that to eliminate non-stormwater discharges.
- **Objective6:** Provide educational outreach to target audience about the program to detect and eliminate illicit discharges.

Londonderry Township, Dauphin County, PA is a township of approximately 5,200 residents that has implemented an Illicit Discharge Detection & Elimination (IDD&E) system to best manage storm water regulations as required by their MS4 permit. The IDD&E program will utilize several existing procedures as well as develop new ideas to best eliminate illicit discharges into the MS4.

**Minimum Measure Objective:** The purpose of the IDD&E program is to establish and carry out procedures to identify and remove illicit discharges, establish legal authority for enforcement actions,

and encourage public education and involvement in eliminating illicit discharges. The illicit discharge elimination program will also allow the Township to continue to develop the comprehensive map of the storm drain system.

- **Objective1:** Maintain a written procedure for IDD&E by:
  - o **Objective1A:** Identify priority areas.
    - This will be determined based on where illicit discharges have been detected previously, or in highly urbanized areas. See Objective1E.
  - o **Objective1B:** Determine procedures for: A) screening outfalls in priority areas, once determined, identify source, and determine how to eliminate; and B) addressing information, or complaints received from the public.
    - See document “Londonderry Township Addressing Illicit Discharge Procedure”; Fill out top portion of “Londonderry Township MS4 Concern Form”, form should be handled via “Illicit Discharge Reporting Flow Chart” [or MS4 Coordinator (if not available direct to Codes and Zoning Officer, then Township Manager)]. MS4 coordinator will conduct evaluation of discharge to determine if illicit. If illicit, MS4 coordinator will evaluate cause of discharge, provide education and if needed contact local authority to administer fine.
      - If the spill is large, or otherwise uncontrollable, or possesses immediate danger to life, the environment, or property call 911 or South-Central Emergency 24/7 number: 717-705-4700.
    - All reports will be evaluated as outlined in Objective1E.
  - o **Objective1C:** Maintain procedures to handle sewage disposal systems as the cause for an illicit discharge.
    - The Township has enacted an Ordinance in 2013 for O.L.S.D.S. and works to educate the public via newsletter and Township website. Website connects visitors to certified Pumper-Haulers.
    - Reports of faulty sewage disposal system, MS4 Coordinator will conduct site visit, and administer tests as necessary.
  - o **Objective1D:** Gain access to private property to inspect outfalls.
  - o **Objective1E:** Procedures for program documentation, evaluation and assessment.

- Each year, during the annual report development, the IDD&E program will be evaluated and updated accordingly. Any newly constructed outfalls will be added to the map. All IDD&E reports will be compiled to ensure that all citizen concerns have been addressed. Township staff will review MS4 concern forms, specifically the outcomes of these cases. If staff notices a specific area in the Township has an unusually high volume, or an area has an increase in reports as compared to years past, these may be indicators that changes need to be made to procedures, education, and the focus of minimum control measures redirected. These files will be reviewed for completion, and a summary report will be compiled for the annual report, documenting the follow-up action taken for each report. Files will be included in Annual Report.

**Accountability:** The Township will continue to develop their IDD&E, utilizing call forms and training sessions. Reviewing the IDD&E program will help staff to understand which parts of the program are working successfully or unsuccessfully, and will ensure the completion of all reports, and the amendment of stormwater issues, prior to the compilation of the annual report. In the summer of the current permit year, a training session will be held for each municipal staff department (office staff, public works, golf course, and codes/zoning). The Township phone number and Environmental Department cell phone number will be published as a reminder for citizens to report illegal dumping and suspicious discharges. The phone number will be advertised in the Township newsletter, bulletin board, website, and Facebook.

- **Objective2:** Develop and maintain Urbanized Area map and locations of outfalls and observation points. Expand map to throughout MS4 jurisdiction; include entire storm sewer collection system owned and maintained by Londonderry Township, additionally include privately owned components.
  - Londonderry Township utilizes, and will expand, a GIS mapping system to maintain records of outfalls, observation points, storm sewer collection systems and is working to include privately owned components.
- **Objective4:** Conduct dry weather screenings of the MS4 outfalls to evaluate the presence of illicit discharges. If detected, follow procedures outlined in Objective1.
  - *Any newly constructed outfalls should be added to the map at the end of the permit year and visited in the subsequent permit year.*
  - The township will work to incorporate an electronic database collection system (GIS) to better organize and utilize data collected. All outfall inspections will be reported on DEP MS4 Outfall Field Screening Report.

- If dry weather screenings produce flow, refer to Objective 3E.
  - **Accountability:** The MS4 infrastructure map will be utilized in ascertaining the areas of greatest concern, tracing back illicit discharges to their source, eliminating illicit connections, and overall asset management as the storm sewer system is upgraded over time.
  
- **Objective5:** Maintain and update Stormwater Management Ordinance/Standard Operating Procedure in order to enforce SWMP that to eliminate non-stormwater discharges.
  - See MCM2 Objective 2
  
- **Objective6:** Provide educational outreach to target audience about the program to detect and eliminate illicit discharges.
  - See MCM2 Objective 3
  - **Accountability** Phone contacts will supplement the municipality’s own efforts of physically conducting outfall inspections. Advertisement of the program and contact information will promote public awareness of their responsibility to report illicit discharges and avoid causing an illicit discharge. A Township goal is to facilitate the clean-up and remediation of illegal dumping sites, which have the potential to contaminate surface and ground water sources. The intent is to promote the IDD&E program to improve public involvement and help inform the public about the hazards of illicit discharges and illegal dumping.
  
- **Objective7:** Identify illicit connections through dry weather screening and “stream walks”
  - Londonderry Township contains approximately 63 stream miles. Each permit year, 25% of streams will be walked and potential illicit connections will be located. The ‘stream walk’ will occur in the fourth quarter of the current permit cycle or in the first quarter of the upcoming permit cycle, with the intent that leaf cover is not yet fully developed and the weather has warmed. This dry weather screening will include water sampling and testing for dry weather flows in the event that they were not previously tested and determined to be a legal connection. The purpose of this activity is to identify and eliminate illicit discharges into Township streams.
    - **Inspection Cycle Year 1:** Iron Run Urbanized Area
    - **Inspection Cycle Year 2:** 283 Corridor Urbanized Area
    - **Inspection Cycle Year 3:** Conewago Creek Urbanized Area

- **Inspection Cycle Year 4:** Susquehanna River Urbanized Area
  - All identified discharges will be marked, tested, and documented. In the event that the Township determines that any of the discharges identified are prohibited under subsection §150.4 of the SWMO, the Township will notify the responsible person(s) to cease the discharge (§150.5). Upon notice provided by the Township, the discharger will have reasonable time, as determined by the Township, to cease the discharge, consistent with the degree of pollution caused by the discharge (§150.6).
- **Justification:** Stream walks are the most direct way to detect and eliminate illegal connections and unmapped outfalls. Stream teams will be tasked with walking along streams identified as “high risk” or with possible TMDL loading restrictions. Teams will confirm previously mapped outfalls, test dry weather flows and attempt to locate the potential pollution source.

## Londonderry Township

### Addressing Illicit Discharge Procedure

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Follow these steps to insure a proper illicit discharge reporting procedure

1. Reporting the illicit discharge
  - a. For calls into the Township Office, direct the call to the MS4 Coordinator
    - i. If they are not available, proceed to step 2
    - ii. If the spill is large or otherwise uncontrollable, or possesses immediate danger to life, the environment, or property; ask for the person’s location and tell them to hang up and dial 911
  - b. For staff found illicit discharges proceed to step 2
2. Fill out the top portion of the “Londonderry Township MS4 Concern Form”
3. Give the form to the MS4 Coordinator

- a. If they are not available, give form to the codes and zoning officer
    - i. If they are not available give form to the Township Manager.
4. The MS4 Coordinator, Codes and Zoning Officer, or Township Manager has a maximum of 1 business day to respond. Response is carried out through...
  - a. Field visit
    - i. During field visits, there must always be two people
  - b. Take pictures
  - c. Conduct water tests if needed- contact HRG for assistance when needed
  - d. Fill out field report
    - i. If there is no way to determine an actual illicit discharge, we will continue to check the site from time to time.
5. If illicit discharge is grey water, SEO must be contacted
6. The MS4 Coordinator will then bring back the findings and determine:
  - a. How to fix the problem
  - b. Who is responsible
  - c. Is this a public works or codes issue
  - d. If it is a codes issue; The Code/Zoning Officer will then issue a notice of violation within 72 hours of call
    - i. Yellow notice on door
    - ii. Both a certified and non-certified letter
7. The Code/Zoning Officer will determine the appropriate time frame on resident resolution within the enforcement ordinance and confirm with resident that the time frame is achievable

*Revised 1/8/2021*

*Updated to better align with permit requirements 7/25/2019.*

*Updated to reflect current township programs and abilities 6/10/19.*

