

Illicit Discharge Detection and Elimination Program (IDDE)

Objective: In keeping with the terms of its Phase II Small MS4 Permit, the Town of Wilton will implement an IDDE program to systematically find and eliminate sources of non-stormwater from the separate storm sewer system and to establish procedures to prevent illicit connections and discharges. These procedures will be applied within the designated areas as determined by the EPA (see: "NPDES Phase II Stormwater Program Automatically Designated MS4 Areas" map to be found in the appendix). A current storm sewer system map and outfall inventory is also included in the appendix and will be updated periodically as changes occur.

Allowable Non-Stormwater Discharges: The following categories of non-stormwater discharges are allowed under this regulation unless the Town of Wilton, EPA, or NHDES identifies any category of non-stormwater discharge listed below as a significant contributor of pollutants to the MS4. If so, then that category shall be deemed an "illicit discharge" and treated as such by the administering authorities. Normally allowable discharge categories are:

- a. Water line flushing
- b. Landscape irrigation
- c. Diverted stream flows
- d. Rising ground water
- e. Uncontaminated ground water infiltration (as defined at 40CFR§35.2005(20))
- f. Uncontaminated pumped groundwater
- g. Discharge from potable water sources
- h. Foundation drains
- i. Air conditioning condensation
- j. Irrigation water, springs
- k. Water from crawl space pumps
- l. Footing drains
- m. Lawn watering
- n. Individual resident car washing
- o. Flows from riparian habitats and wetlands
- p. De-chlorinated swimming pool discharges
- q. Street wash waters
- r. Residential building wash waters

2.3.4.8 – Illicit Discharge Detection and Elimination Program – The IDDE program shall be recorded in a written document. The IDDE programs shall include each of the elements described in Parts 2.3.4.8 (a-h), unless the permittee provides a written explanation within the IDDE program as to why a particular element is not applicable to the permittee.

Notwithstanding the permittee's explanation, EPA may at any time determine that a particular element is in fact applicable to the permittee and require the permittee to add it to the IDDE program. The written IDDE program shall be completed within one (1) year of the effective date of the permit. The permittee shall implement the IDDE program in accordance with the goals and milestones set forth in Part 2.3.4.9.

- a. Legal Authority - The IDDE program shall provide that the permittee has adequate legal authority to accomplish the following tasks: prohibit illicit discharges; investigate suspected

illicit discharges; 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. Adequate legal authority consists of a currently effective ordinance, by-law, or other regulatory mechanism. For permittees authorized by the MS4-2003, the ordinance, by-law, or other regulatory mechanism was a requirement of the MS4-2003 and was required to be effective by May 1, 2008. The written IDDE program shall include a reference or citation of the authority the permittee will use to implement all aspects of the IDDE program.

b. Statement of IDDE Program Responsibilities - The permittee shall establish a written statement that clearly identifies responsibilities with regard to eliminating illicit discharges. The statement shall identify the lead municipal agency(ies) or department(s) responsible for implementing the IDDE Program as well as any other agencies or departments that may have responsibilities for aspects of the program (e.g. board of health responsibilities for overseeing septic system construction; sanitary sewer system staff; inspectional services for enforcing plumbing codes; town counsel responsibilities in enforcement actions, etc). Where multiple departments and agencies have responsibilities with respect to the IDDE program specific areas of responsibility shall be defined and processes for coordination and data sharing shall be established and documented.

c. Assessment and Priority Ranking of Catchments –The town shall assess and priority rank the catchments, delineated as required by Part 2.3.4.6.a.i., in terms of their potential to have illicit discharges and SSOs and the related public health significance. This ranking will determine the priority order for screening of outfalls and interconnections pursuant to Part 2.3.4.8.d., catchment investigations for evidence of illicit discharges and SSOs pursuant to Part 2.3.4.8.e., and provides the basis for determining permit milestones pursuant to Part 2.3.4.9.

i. The town shall classify each catchment into one of the following categories:

- Excluded catchments: Catchments with no potential for illicit discharges may be excluded from the IDDE program. 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.
- Problem Catchments: Catchments with known or suspected contributions of illicit discharges based on existing information shall be designated as Problem Catchments. Problem Catchments need not be screened pursuant to Part 2.3.4.8.d, and shall be scheduled for catchment investigation pursuant to Part 2.3.4.8.e
- High Priority Catchments: Catchments that have not been classified as Problem Catchments and that are discharging to an area of concern to public health due to proximity of public beaches, recreational areas, drinking water supplies or shellfish beds;

catchments determined by the permittee as high priority based on outfall/interconnection screening under Part 2.3.4.8.d or Part 4.3.1 and catchment characteristics assessment under Part 2.3.4.8.c.ii.

Any catchment where outfall/interconnection screening indicates sewer input based on olfactory/visual evidence or sampling results (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 ammonia ≥ 0.5 mg/l, surfactants ≥ 0.25 mg/l, and detectable levels of chlorine) shall be ranked at the top of the High Priority Catchments category and scheduled for catchment investigation pursuant to Part 2.3.4.8.e.

- Low Priority Catchments: Catchments determined by the permittee as low priority based on outfall/interconnection screening under 2.3.4.8.d and catchment characteristics assessment under Part 2.3.4.8.c.ii.

ii. The town shall priority rank catchments within each category (except for excluded

catchments), based on screening factors. The town shall, at a minimum, consider the following screening factors:

- Past discharge complaints and reports.
- Poor dry weather receiving water quality-the following guidelines are recommended to identify waters as having a high illicit discharge potential: exceeding water quality standards for bacteria; ammonia levels above 0.30 mg/l; total phosphorus levels greater than 0.40 mg/l; surfactants levels greater than or equal to 0.25 mg/l.
- Density of generating sites -Generating sites are those places, including institutional, municipal, commercial, or industrial sites, with a potential to generate pollutants that could contribute to illicit discharges. Examples of these