

JEFFERSON COUNTY STORMWATER COALITION

ILLICIT DISCHARGE TRACK DOWN AND ELIMINATION PROGRAMS MANUAL

Policies and Procedures

Created by Jefferson County SWCD

9/26/25

Illicit Discharge Detection and Elimination Program Manual

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Section 1 – Introduction

1.1 Background

The Jefferson County Stormwater Coalition, consisting of nine municipalities and Jefferson County, has made a strong commitment to protect and manage the area's natural resources. The stormwater coalition's Stormwater Management Program (SWMP) Plan seeks to minimize the negative effects of development and pollution while maximizing environmental protection and conservation. Protecting and preserving the quality of the area's surface water is a key focus area of the SWMP.

According to the US EPA's 2000 National Water Quality Inventory, 39 percent of assessed river and stream miles, 46 percent of assessed lake acres, and 51 percent of assessed estuarine square miles do not meet water quality standards. The top causes of impairment include siltation, nutrients, bacteria, metals (primarily mercury), and oxygen-depleting substances. Polluted stormwater runoff, including runoff from urban/suburban areas and construction sites, is a leading source of these impairments. To address this problem, EPA established the National Pollutant Discharge Elimination System (NPDES) program as part of the Clean Water Act to regulate stormwater discharges.

In the State of New York, EPA has delegated the NPDES program administration to the New York State Department of Environmental Conservation (NYSDEC) Division of Water (DOW). NYSDEC DOW issued a Phase II Municipal Stormwater Permit to the coalition members in 2014. This permit requires the coalition to include illicit discharge detection *and* elimination protocols to prevent, locate, and correct illicit discharges.

The Coalition's Illicit Discharge Track-Down and Elimination programs are managed by each of the nine municipalities' Public Works Departments. Maintenance staff and construction site inspectors also play an important role in identifying illicit discharge problems and responding to clean-up requests. However, all Public Works, Planning and Community Development, Parks, Police, and Fire staff will play a role in locating, identifying, and reporting potential illicit discharges.

1.2 What is an Illicit Discharge?

An illicit discharge is defined as "...any direct or indirect non-stormwater discharge to the Coalition's storm drain system, except as expressly allowed by this chapter." Examples of illicit discharges include (but are not limited to) the following:

- Disposal of vehicle maintenance fluids into a storm drain;
- Hosing or washing loading areas in the vicinity of storm drain inlets;
- Leaking dumpsters flowing into a storm drain inlet;
- Damaged sanitary sewer line leaking fluids into a cracked or damaged storm sewer line;
- Pouring paints or stains into a storm drain;
- Allowing washwater with soaps or detergents into a storm drain inlet;
- Washing silt, sediment, concrete, cement or gravel into a storm drain; and
- A measurable flow during dry weather that contains pollutants or pathogens.

1.3 What is an Illicit Connection?

An illicit connection is defined as “Any man-made conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections.” Examples of illicit connections include (but are not limited to) the following:

- Sanitary sewer piping that is connected directly from a building to the stormwater system;
- A basement or shop floor drain that is connected to the stormwater system; or
- A cross connection between the municipal sanitary sewer and the stormwater system.

1.4 Summary of the Programs

The Municipal Separate Storm Sewer Systems (MS4) general permit requires the permittees to develop these illicit discharge programs encompassing the elements listed below. Each element is addressed in the sections of this Illicit Discharge Track Down and Elimination Program Manual as noted below.

- Training (Section 2)
- Track Down Procedures (Section 3)
- Elimination Procedures (Section 4)

This manual is intended to assist staff in implementing the Illicit Discharge Track Down and Elimination Programs, and as a guidance document for their day-to-day activities related to said programs. This document can also be used as a training tool to ensure that staff are following the same procedures in responding to illicit discharge concerns.

Section 2 – Training Requirements

- If new staff are added, training on the MS4 Operator’s *Illicit Discharge Track Down and Elimination Procedures*, as well as your municipality’s *Enforcement Response Plan (ERP)*, must be given prior to conducting illicit discharge track downs or elimination enforcement.
- For existing staff, training on the MS4 Operator’s *Illicit Discharge Track Down and Elimination Procedures*, and your municipality’s *Enforcement Response Plan (ERP)* must be given at least once every five (5) years.
- If the illicit discharge track down, elimination, or ERP procedures are updated, training on the updates must be given to all staff prior to conducting illicit discharge track downs/ eliminations.

**The names, titles, and contact information for the individuals who have received these trainings must be updated annually by April 1 and recorded in the SWMP Plan. Please report this information to JC SWCD.

Section 3 – Investigation Procedures

3.1 Purpose

Potential illicit discharge problems can be revealed through outfall inspections or reports from staff, tenants, or the public as described in the coalition’s Monitoring and Sampling Procedures (kept with each operator’s SWMP).

Once a problem has been verified (either through a routine outfall inspection or follow-up to a called-in complaint), the municipality will begin an official illicit discharge investigation, following the procedures outlined in this section.

When an illegal dumping or illicit discharge problem is directly observed by a member of the municipal staff, it is generally not necessary to follow these investigation procedures. In those scenarios, the source of the problem discharge is already known. Problems revealed through direct observation should be referred directly to the corrective action information in Section 4 and the MS4 Operator's Enforcement Response Plan (ERP). In the event that a reported problem does not have a defined source, the procedures in this section should be followed to trace the source of the illicit discharge.

3.2 Timeframes to Initiate Track Down Procedures

- Suspect illicit discharges: **5 days**
- Obvious illicit discharges: **24 hours**
- Obvious illicit discharges of sanitary water with a direct threat to human health¹: **2 hours** (and must report to the regional water engineer and health department)

Contact Information	
Regional Water Engineer:	matthew.duffany@dec.ny.gov
Health Department:	315-785-2277

3.3 Tracing the Source

This section outlines the basic tools that can be used to trace the source of a suspected illicit discharge. Source tracing begins when a suspected problem area is identified through outfall monitoring, field assessment/testing, or a complaint call. When the source of the non-stormwater discharge is not known, several methods can be used to locate the source of an illicit discharge:

1. Storm Drain Network Investigation

- Field crews strategically inspect manholes to measure chemical or physical indicators to determine which specific segment of the network is carrying the illicit discharge.
 - Once the pipe segment the illicit discharge is coming from has been identified, on-site investigations are used to find the specific discharge or illicit connection²

2. Drainage Area Investigation

¹ AKA: Sewage discharging to bathing areas, shell fishing areas, or public water intakes

² Ex) Neon green liquid is found during outfall inspection. Crews use stormwater system map to work their way up the system until the substance is no longer found. On-site investigation methods are then used in the last segment the pollutant was spotted.

- Looks at land use and/or other characteristics of the drainage area that is producing the illicit discharge.³

3. On-site Investigation

- On-site methods used to trace source of an illicit discharge in a pipe segment.
 - E.g.) dye, video, or smoke testing

4. Septic System Investigation

- Used in low-density residential watersheds not served by sanitary sewers or where stormwater is conveyed in ditches or swales.

Procedures on how to conduct each of these track down methods are detailed in Chapter 13 of the Center of Water Shed Protection's 2004: [Illicit Discharge Detection and Elimination Guidance Manual for Program Development and Technical Assessments](#) (Attached for ease of reference in **Appendix A**).

3.3.1 Open a Case Log

When problems are identified, a case log should be opened, and assigned a case number, creation date, case description and the primary staff contact/investigator. A work order is created listing the property name, person responsible, and tracking all information related to the observed or suspected problem. The investigator assigned to the case shall keep an accurate log of labor, materials and costs associated with the investigation for invoicing the responsible party. The case log should be opened prior to completing any additional field work unless the nature of the discharge necessitates an immediate response.

The file should include copies of the following, if applicable:

- Water Quality Incident Report & Response Form
- Copy of Outfall Inspection Report
- Photographs
- Additional field notes
- Lab testing results
- Compliance letters sent and responses received
- Correspondence (mail, email, telephone logs)
- Proof of corrected problems (contract and invoice or clean field investigation report)

Any field investigations, photographs, corrective actions, or other activities associated with the suspected problem area should be documented in the case log. This becomes the municipality's official record of the IDDE investigation. Additional record-keeping information is included in Section 8.

3.3.2 Method 1 – Storm Drain Network Investigations

³ Ex) Large amounts of a substance that looks like motor oil is found at an outlet. Crews consult the stormwater system map and see that a commercial garage is within the sewershed. This area is investigated first as it is the most likely source.

The source of some illicit connections or discharges can be located by systematically isolating the area from which the polluted discharge originates. This method involves progressive investigation at manholes in the storm drain network to narrow down the location where the illegal discharge is entering the drainage system. This method is best used to identify constant or frequent discharge sources, such as an illicit connection from a sewer system or sink drain into the storm drainage network. One-time illegal discharges (such as a surface spill or intentional dumping into the storm drain system) should be investigated using Method 2, described later in this section.

Field crews should work progressively upstream from the outfall and inspect manholes until indicators reveal the discharge is no longer present. Manhole observations can be time-consuming, but they are generally a necessary step before conducting other tests. In particularly large storm drain systems, it may be helpful to first identify major branches of the system and test one manhole at the downstream end of each branch. This can help to reduce the area that must be investigated.

Storm drain network investigations include the following steps:

1. Consult the storm sewer system map and identify the major branches. If a drainage system map is not available or major branches cannot be identified, then manhole observations and probe readings must be done at each successive upstream manhole to map the drainage system and isolate the location of the polluted discharge entry. In such a case, field crews should also use the GPS unit to locate each observed manhole and add the location readings to the municipality's storm sewer system map.
2. Starting from the outfall, observe and take probe readings at the next upstream manhole or junction to see if there is evidence of polluted discharge. As with the outfall inspections, field crews are looking for the presence of flow during dry weather, foul odors, colors or stained deposits, oily sheen, floatable materials, and/or unusual probe readings.
3. Repeat observations and probe readings at each upstream manhole or junction until a junction is found with no evidence of discharge; the discharge source is likely located between the junction with no evidence of discharge and the next downstream junction.
4. Work downstream from the "clean" manhole or junction to isolate the location where the polluted discharge is entering the storm drain system.
5. If discharge is evident from private property, initiate private property site entry procedures.
6. Document all findings on the Water Quality Incident Report & Response Form and record all information in the database case log.

Figure 1 shows the observation steps to isolate the location where an illicit discharge is entering the storm drainage network.

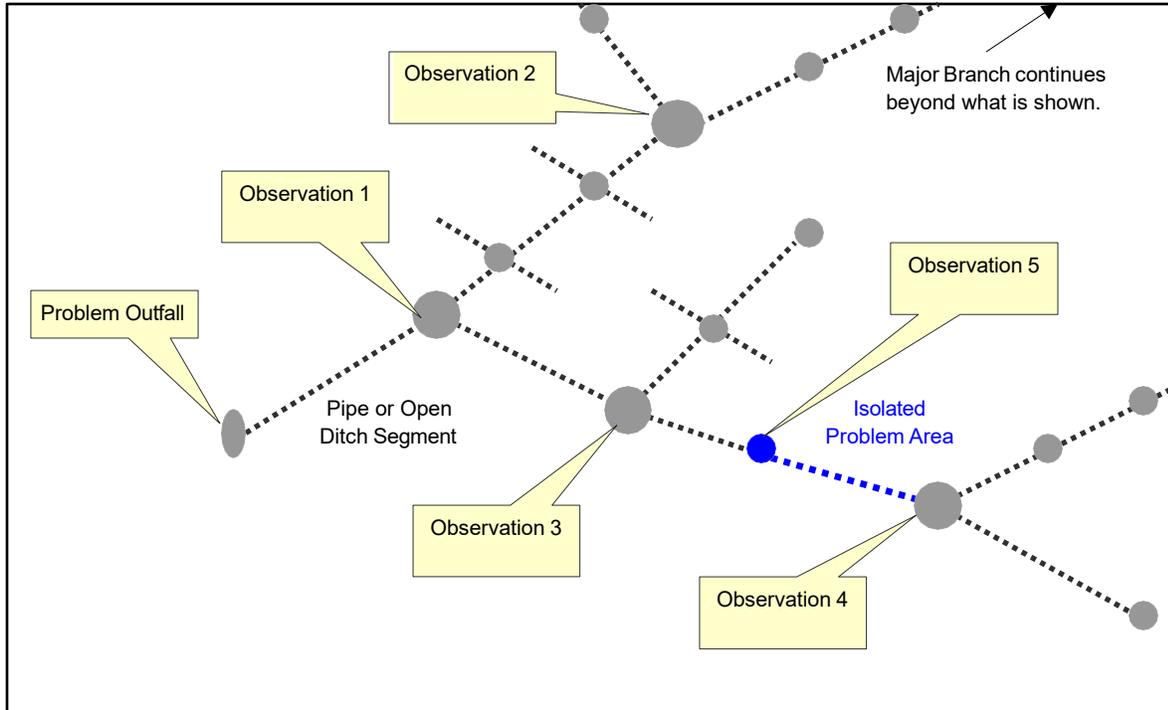


Figure 1. Storm Drain Network Observation Steps

Once the location of the source has been narrowed down, if visual inspections are not enough to isolate the exact source of the illegal discharge, proceed to **Method 3: On-site investigation**.

See **Appendix A** for instructions on employing these testing techniques.

Confirmed illicit discharge sources should be referred to the follow-up actions and corrective action procedures described in the MS4 Operators Enforcement Response Plan (ERP) and Section 4 of this document.

3.3.3 Method 2 – Drainage Area Investigations

The source of some illegal discharges can be determined through a survey or analysis of the drainage area of the problem outfall. Drainage area investigations are particularly useful when the discharge observed at the outfall has a distinct or unique characteristic that allows field crews to quickly determine the type of activity or non-point source that is generating the discharge. Drainage area investigations are generally not helpful in tracing sewage discharges, since they are not related to a specific land use.

Drainage area investigations should begin with a discussion between the field crews, inspectors, engineers, and other knowledgeable municipal staff to identify the type of site most likely to

produce the observed discharge.

Table 1 shows some of the activities or land uses most likely associated with specific discharge problems.

Table 1. Common Discharges and Potential Sources	
Observed Discharge	Potential Causes
Clogging Sediment	Construction activity without proper erosion and sediment controls Roadway sanding operations Outdoor work areas or material storage areas
Thick Algae Growth	Fertilizer leak or spill Landscaping operations Hydroseeding following construction Failing or leaking septic system
Oil	Refueling operations Vehicle or machinery maintenance activities
Sudsy Discharge	Power washing of buildings Vehicle or equipment washing operations Mobile cleaning crew dumping Laundry or cleaner Household greywater discharge
Clogged Grease	Restaurant sink drain connection to stormwater system
Sewage	Failing or leaking septic systems

Maps of Geographic Areas of Concern and Pollutants of Concern can be overlaid with storm sewer system maps to determine areas to focus on. Field crews should then conduct a windshield survey of the drainage area to confirm and identify potential sources of the discharge.

Once potential discharge sites are identified, municipal staff should conduct individual site inspections to locate the specific source of the illegal discharge. In some cases, dye testing may be needed to confirm that a suspected activity is actually draining into the storm drain network.

All drainage area investigations should be documented on the Water Quality Incident Report & Response Form and recorded with the database case log.

3.3.4 Equipment

Prior to conducting field work, crews should assemble all required equipment and review the outfall inspection records or water quality incident reports from the area to become familiar with the background information and potential pollution sources.

Field Equipment for Source Investigations:

- | | |
|---|--|
| <input type="checkbox"/> Safety gear: vest, hard hat, cones | <input type="checkbox"/> Machete/Clippers |
| <input type="checkbox"/> Field Notebook/Pencils | <input type="checkbox"/> Flashlight or headlamp |
| <input type="checkbox"/> Incident Response Forms | <input type="checkbox"/> Spray paint or other marker |
| <input type="checkbox"/> Map or Aerial Photo of Area | <input type="checkbox"/> Pick or CB grate/cover remover |
| <input type="checkbox"/> Cell phone w/ charged battery | <input type="checkbox"/> Field test kit |
| <input type="checkbox"/> Digital camera w/ charged battery | <input type="checkbox"/> First aid kit |
| <input type="checkbox"/> GPS Unit | <input type="checkbox"/> Toolbox – hammer, tape measure, duct tape, zip ties |

Section 4- Illicit Discharge Elimination

4.1 Timeframes to Eliminate Illicit Discharges

- Within **5 days** of identification of an illicit discharge that does **not** have a reasonable likelihood of adversely affecting human health or the environment
- Within **24 hours** of identification of an illicit discharge that **has** a reasonable likelihood of adversely affecting human health or the environment
- When elimination of an illicit discharge is **not possible** within its specified timeframe, the MS4 Operator **must notify** the Regional Water Engineer

Contact Information

Regional Water Engineer: matthew.duffany@dec.ny.gov
315-785-2513

4.2 Enforcement Actions

Once the source of an illicit discharge has been identified, the investigator should immediately refer to their municipality's Enforcement Response Plan (ERP) for next steps. The investigator must also complete the Water Quality Incident Report & Response Form and enter all information in the database case log to document the findings. The appropriate municipal staff can then begin working through the corrective action steps outlined in the ERP.

Section 5 – Record-Keeping

The MS4 General Permit requires the Coalition to keep records of all stormwater program activities. Thorough record-keeping is particularly important for a successful Illicit Discharge Elimination Program. Records of past problems can help focus an investigation in the right direction or identify repeat offenders. Thorough record-keeping is also critical to the enforcement process. Examples of the different types of information to be retained are included below:

- **Citizen Complaints** – retain *Illicit Discharge Report Documentation Form (Appendix B)*
- **Outfall Inspections** – maintain Outfall Inspection Forms within the SWMP Plan, including photographs (**Appendix C**). Each municipality will maintain open case logs for suspected problem areas.
- **Investigations** – retain *Illicit Discharge Report Documentation Form* and document within the SWMP.
- **Corrective Action** – in addition to the information collected during the investigation process, retain copies of compliance letters, correspondence with property owners, and proof of corrected problems (contract and invoice for completed work or clean field investigation report).

**** All reports, inspections, investigations, and corrective actions should be reported to Jefferson County SWCD within 30 days for inclusion in the SWMP ****

5.1 Data Sources

Outfall Inspections – Outfall inspection results are reported to Jefferson County SWCD for inclusion in coalition mapping, and paper forms are retained at each municipality’s office with the SWMP (form found in **Appendix C**).

Note: these records may be audited by DEC or the EPA and must be retained for a minimum of five (5) years.

Investigations – Illicit discharge investigation records utilize a complaint tracking number included in the SWMP Plan. A case log is created for each individual complaint call. The system tracks actions completed by the investigator, including: education opportunities, technical assistance, communications, samples collected, and enforcement.

Storm Sewer Maps- These are updated and stored with the SWMP.

Total Storm Sewer System Maps- These are updated and stored with the SWMP.

Section 6 – References

Illicit Discharge Detection and Elimination Program Manual, City of Bainbridge Island, April 2010.

Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, Center for Watershed protection and Robert Pitt (University of Alabama), October 2004.

Illicit discharge Detection and Elimination Manual: A Handbook for Municipalities, New England Interstate Water Pollution Control Commission, January 2003.

Investigation of Inappropriate Pollutant Entries into Storm Drainage Systems: A User's Guide, Robert Pitt, et al, EOA publication 600/R-92/238, January 1993.

[Appendix A:](#)

Illicit Discharge Detection and Elimination Guidance Manual for Program Development and Technical Assessments:

Chapter 13

Produced by: The Center of Watershed Protection

(see next page)

Chapter 13: Tracking Discharges To A Source

Once an illicit discharge is found, a combination of methods is used to isolate its specific source. This chapter describes the four investigation options that are introduced below.

Storm Drain Network Investigation

Field crews strategically inspect manholes within the storm drain network system to measure chemical or physical indicators that can isolate discharges to a specific segment of the network. Once the pipe segment has been identified, on-site investigations are used to find the specific discharge or improper connection.

Drainage Area Investigation

This method relies on an analysis of land use or other characteristics of the drainage area that is producing the illicit discharge. The investigation can be as simple as a “windshield” survey of the drainage area or a more complex mapping analysis of the storm drain network and potential generating sites. Drainage area investigations work best when prior indicator monitoring reveals strong clues as to the likely generating site producing the discharge.

On-site Investigation

On-site methods are used to trace the source of an illicit discharge in a pipe segment, and may involve dye, video or smoke testing within isolated segments of the storm drain network.

Septic System Investigation

Low-density residential watersheds may require special investigation methods if

they are not served by sanitary sewers and/or storm water is conveyed in ditches or swales. The major illicit discharges found in low-density development are failing septic systems and illegal dumping. Homeowner surveys, surface inspections and infrared photography have all been effectively used to find failing septic systems in low-density watersheds.

13.1 Storm Drain Network Investigations

This method involves progressive sampling at manholes in the storm drain network to narrow the discharge to an isolated pipe segment between two manholes. Field crews need to make two key decisions when conducting a storm drain network investigation—where to start sampling in the network and what indicators will be used to determine whether a manhole is considered clean or dirty.

Where to Sample in the Storm Drain Network

The field crew should decide how to attack the pipe network that contributes to a problem outfall. Three options can be used:

- Crews can work progressively up the trunk from the outfall and test manholes along the way.
- Crews can split the trunk into equal segments and test manholes at strategic junctions in the storm drain system.
- Crews can work progressively down from the upper parts of the storm drain network toward the problem outfall.

The decision to move up, split, or move down the trunk depends on the nature and land use of the contributing drainage area. Some guidance for making this decision is provided in Table 53. Each option requires different levels of advance preparation. Moving up the trunk can begin immediately when an illicit discharge is detected at the outfall, and only requires a map of the storm drain system. Splitting the trunk and moving down the system require a little more preparation to analyze the storm drain map to find the critical branches to strategically sample manholes. Accurate storm drain maps are needed for all three options. If good mapping is not available, dye tracing

can help identify manholes, pipes and junctions, and establish a new map of the storm drain network.

Option 1: Move up the Trunk

Moving up the trunk of the storm drain network is effective for illicit discharge problems in relatively small drainage areas. Field crews start with the manhole closest to the outfall, and progressively move up the network, inspecting manholes until indicators reveal that the discharge is no longer present (Figure 50). The goal is to isolate the discharge between two storm drain manholes.

Table 53: Methods to Attack the Storm Drain Network			
Method	Nature of Investigation	Drainage System	Advance Prep Required
Follow the discharge up	Narrow source of an individual discharge	Small diameter outfall (< 36") Simple drainage network	No
Split into segments	Narrow source of a discharge identified at outfall	Large diameter outfall (> 36"), Complex drainage Logistical or traffic issues may make sampling difficult.	Yes
Move down the storm drain	Multiple types of pollution, many suspected problems—possibly due to old plumbing practices or number of NPDES permits	Very large drainage area (> one square mile).	Yes

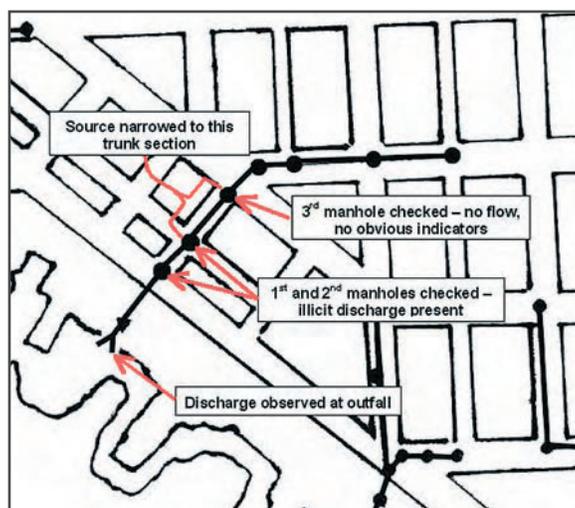


Figure 50: Example investigation following the source up the storm drain system

Option 2: Split the storm drain network

When splitting the storm drain network, field crews select strategic manholes at junctions in the storm drain network to isolate discharges. This option is particularly suited in larger and more complex drainage areas since it can limit the total number of manholes to inspect, and it can avoid locations where access and traffic are problematic.

The method for splitting the trunk is as follows:

1. Review a map of the storm drain network leading to the suspect outfall.
2. Identify major contributing branches to the trunk. The trunk is defined as the largest diameter pipe in the storm drain network that leads directly to the outfall. The “branches” are networks of smaller pipes that contribute to the trunk.
3. Identify manholes to inspect at the farthest downstream node of each contributing branch and one immediately upstream (Figure 51).
4. Working up the network, investigate manholes on each contributing branch and trunk, until the source is narrowed to a specific section of the trunk or contributing branch.
5. Once the discharge is narrowed to a specific section of trunk, select the appropriate on-site investigation method to trace the exact source.
6. If narrowed to a contributing branch, move up or split the branch until a specific pipe segment is isolated, and commence the appropriate on-site investigation to determine the source.

Option 3: Move down the storm drain network

In this option, crews start by inspecting manholes at the “headwaters” of the storm drain network, and progressively move down pipe. This approach works best in very large drainage areas that have many potential continuous and/or intermittent discharges. The Boston Water and Sewer Commission has employed the headwater option to investigate intermittent discharges in complex drainage areas up to three square miles (Jewell, 2001). Field crews certify that each upstream branch of the storm drain network has no contributing discharges before moving down pipe to a “junction manhole” (Figure 52). If discharges are found, the crew performs dye testing to pinpoint the discharge. The crew then confirms that the discharge is removed before moving farther down the pipe network. Figure 53 presents a detailed flow chart that describes this option for analyzing the storm drain network.

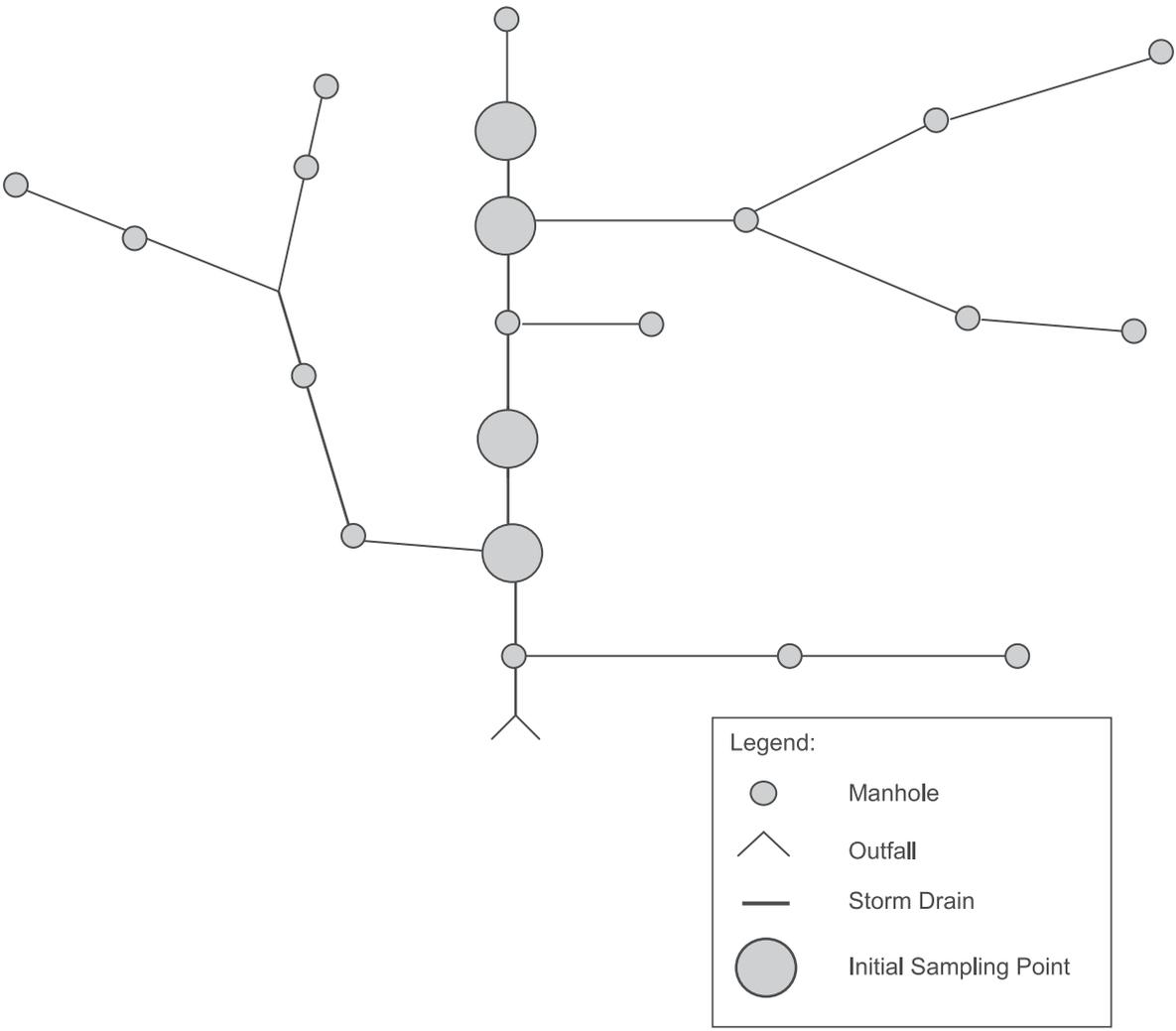


Figure 51: Key initial sampling points along the trunk of the storm drain

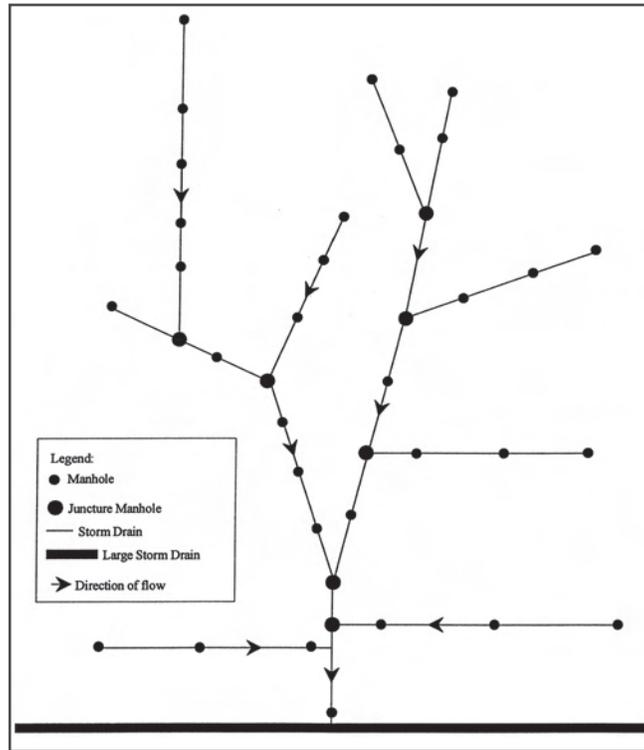


Figure 52: Storm Drain Schematic Identifying “Juncture Manholes” (Source: Jewell, 2001)

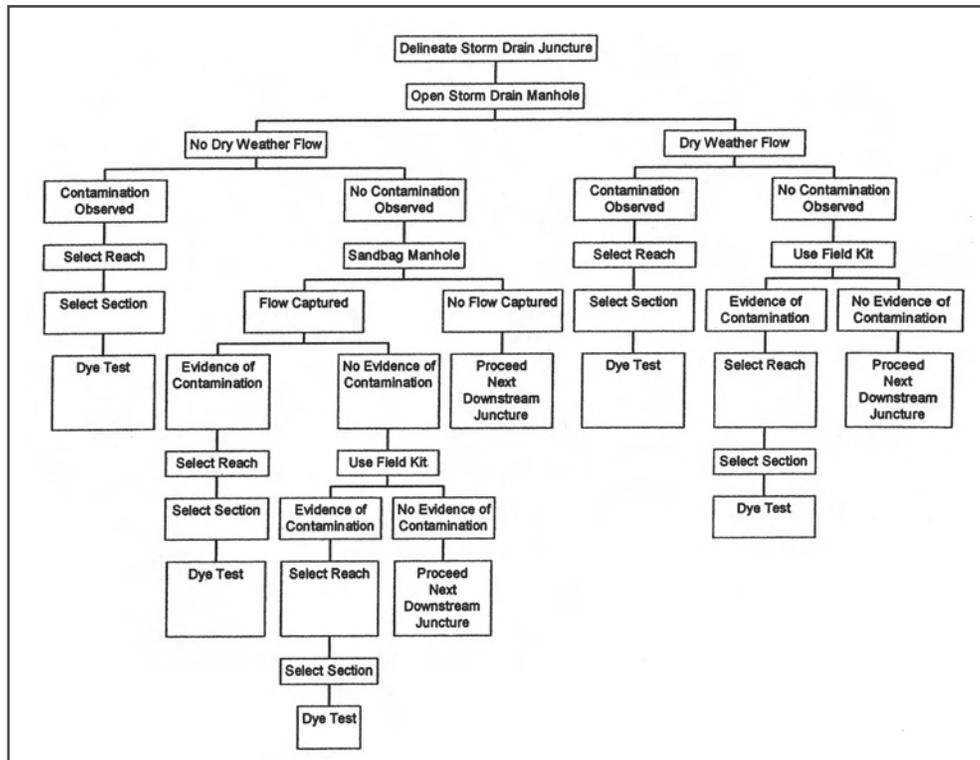


Figure 53: A Process for Following Discharges Down the Pipe (Source: Jewell, 2001)

Dye Testing to Create a Storm Drain Map

As noted earlier, storm drain network investigations are extremely difficult to perform if accurate storm drain maps are not available. In these situations, field crews may need to resort to dye testing to determine the flowpath within the storm drain network. Fluorescent dye is introduced into the storm drain network and suspected manholes are then inspected to trace the path of flow through the network (U.S. EPA, 1990). Two or three member crews are needed for dye testing. One person drops the dye into the trunk while the other(s) looks for evidence of the dye down pipe.

To conduct the investigation, a point of interest or down pipe “stopping point” is identified. Dye is then introduced into manholes upstream of the stopping point to determine if they are connected. The process continues in a systematic manner until an upstream manhole can no longer be determined, whereby a branch or trunk of the system can be defined, updated or corrected. More information on dye testing methods is provided in Section 13.3.

Manhole Inspection: Visual Observations and Indicator Sampling

Two primary methods are used to characterize discharges observed during manhole inspections—visual observations and indicator sampling. In both methods, field crews must first open the manhole to determine whether an illicit discharge is present. Manhole inspections require a crew of two and should be conducted during dry weather conditions.

Basic field equipment and safety procedures required for manhole inspections are outlined

in Table 54. In particular, field crews need to be careful about how they will safely divert traffic (Figure 54). Other safety considerations include proper lifting of manhole covers to reduce the potential for back injuries, and testing whether any toxic or flammable fumes exist within the manhole before the cover is removed. Wayne County, MI has developed some useful operational procedures for inspecting manholes, which are summarized in Table 55.

Table 54: Basic Field Equipment Checklist

• Camera and film or digital camera	• Storm drain, stream, and street maps
• Clipboards	• Reflective safety vests
• Field sheets	• Rubber / latex gloves
• Field vehicle	• Sledgehammer
• First aid kit	• Spray paint
• Flashlight or spotlight	• Tape measures
• Gas monitor and probe	• Traffic cones
• Manhole hook/crow bar	• Two-way radios
• Mirror	• Waterproof marker/pen
• Hand held global positioning satellite (GPS) system receiver (best resolution available within budget, at least 6' accuracy)	



Figure 54: Traffic cones divert traffic from manhole inspection area

Table 55: Field Procedure for Removal of Manhole Covers*(Adapted from: Pomeroy et al., 1996)***Field Procedures:**

1. Locate the manhole cover to be removed.
2. Divert road and foot traffic away from the manhole using traffic cones.
3. Use the tip of a crowbar to lift the manhole cover up high enough to insert the gas monitor probe. Take care to avoid creating a spark that could ignite explosive gases that may have accumulated under the lid. Follow procedures outlined for the gas monitor to test for accumulated gases.
4. If the gas monitor alarm sounds, close the manhole immediately. Do not attempt to open the manhole until some time is allowed for gases to dissipate.
5. If the gas monitor indicates the area is clear of hazards, remove the monitor probe and position the manhole hook under the flange. Remove the crowbar. Pull the lid off with the hook.
6. When testing is completed and the manhole is no longer needed, use the manhole hook to pull the cover back in place. Make sure the lid is settled in the flange securely.
7. Check the area to ensure that all equipment is removed from the area prior to leaving.

Safety Considerations:

1. Do not lift the manhole cover with your back muscles.
2. Wear steel-toed boots or safety shoes to protect feet from possible crushing injuries that could occur while handling manhole covers.
3. Do not move manhole covers with hands or fingers.
4. Wear safety vests or reflective clothing so that the field crew will be visible to traffic.
5. Manholes may only be entered by properly trained and equipped personnel and when all OSHA and local rules apply.

Visual Observations During Manhole Inspection

Visual observations are used to observe conditions in the manhole and look for any signs of sewage or dry weather flow. Visual observations work best for obvious illicit discharges that are not masked by groundwater or other “clean” discharges, as shown in Figure 55. Typically, crews progressively inspect manholes in the storm drain network to look for contaminated

flows. Key visual observations that are made during manhole inspections include:

- Presence of flow
- Colors
- Odors
- Floatable materials
- Deposits or stains (intermittent flows)



Figure 55: Manhole observation (left) indicates a sewage discharge. Source is identified at an adjacent sewer manhole that overflowed into the storm drain system (right).

Indicator Sampling

If dry weather flow is observed in the manhole, the field crew can collect a sample by attaching a bucket or bottle to a tape measure/rope and lowering it into the manhole (Figure 56). The sample is then immediately analyzed in the field using probes or other tests to get fast results as to whether the flow is clean or dirty. The most common indicator parameter is ammonia, although other potential indicators are described in Chapter 12.

Manhole indicator data is analyzed by looking for “hits,” which are individual samples that exceed a benchmark concentration. In addition, trends in indicator concentrations are also examined throughout the storm drain network.



Figure 56: Techniques to sample from the storm drain

Figure 57 profiles a storm drain network investigation that used ammonia as the indicator parameter and a benchmark concentration of 1.0 mg/L. At both the outfall and the first manhole up the trunk, field crews recorded finding “hits” for ammonia of 2.2 mg/L and 2.3 mg/L, respectively. Subsequent manhole inspections further up the network revealed one manhole with no flow, and a second with a hit for ammonia (2.4 mg/L). The crew then tracked the discharge upstream of the second manhole, and found a third manhole with a low ammonia reading (0.05 mg/L) and a fourth with a much higher reading (4.3 mg/L). The crew then redirected its effort to sample above the fourth manhole with the 4.3 mg/L concentration, only to find another low reading. Based on this pattern, the crew concluded the discharge source was located between these two manholes, as nothing else could explain this sudden increase in concentration over this length of pipe.

The results of storm drain network investigations should be systematically documented to guide future discharge investigations, and describe any infrastructure maintenance problems encountered. An example of a sample manhole inspection field log is displayed in Figure 58.

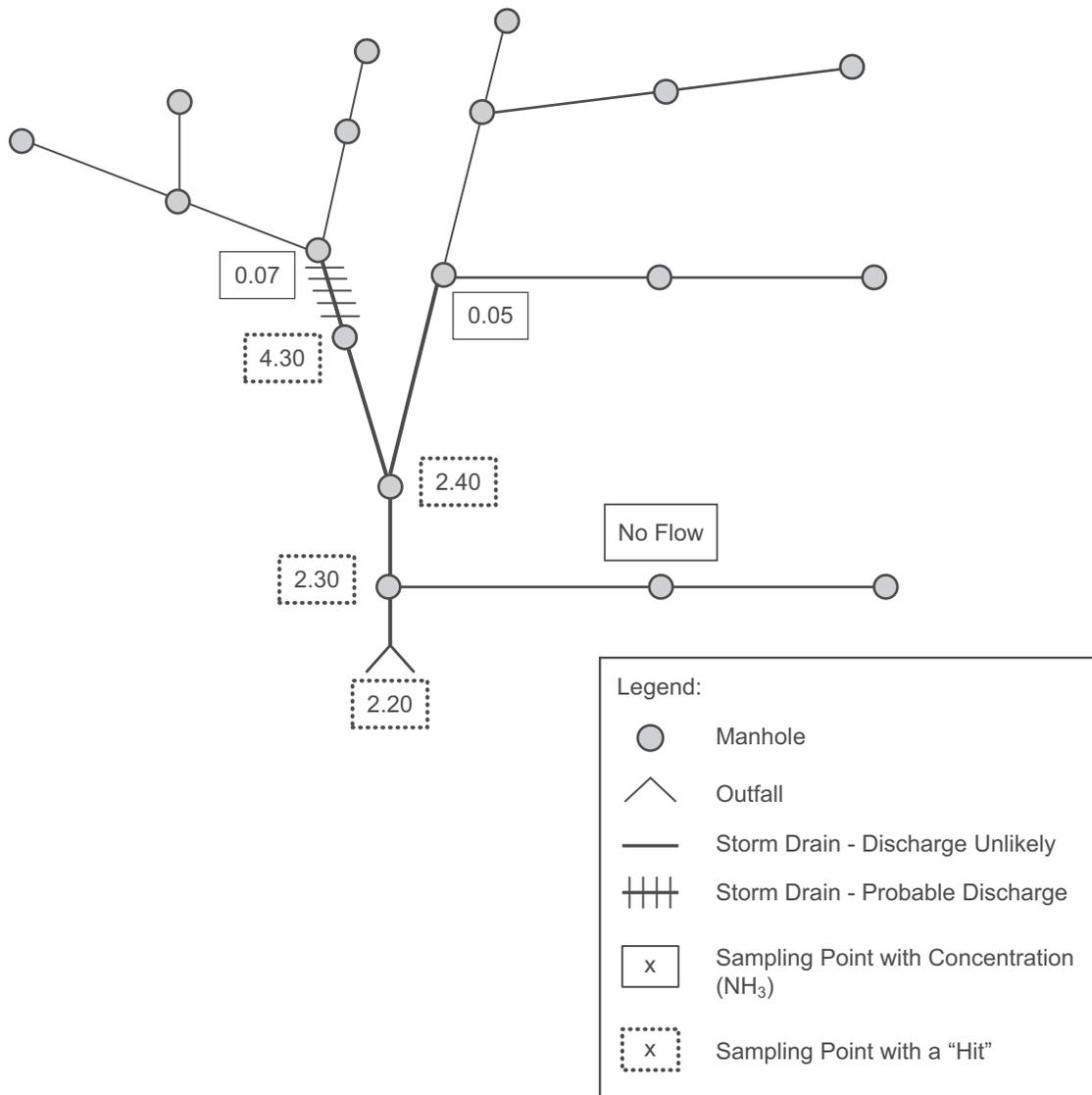


Figure 57: Use of ammonia as a trace parameter to identify illicit discharges



BOSTON WATER AND SEWER COMMISSION
MANHOLE INSPECTION LOG

Manhole ID No.

Inspection Date: _____ Tributary Area: _____

Street: _____ Manhole Type: _____

Inspection: Not Found ___ Surface ___ Internal ___ Sanitary Sewer ___ Storm Drain ___
 Follow Up Inspection ___ High Outlet ___ Lovejoy ___

Time Since Last Rain:

Inspector: _____ < 48 hours ___ 48 – 72 hours ___ > 72 hours ___

Observations:

Standing Water in Manhole: Yes ___ No ___ Color of Water: Clear ___ Cloudy ___ Other _____

Flow in Manhole: Yes ___ No ___ Velocity: Slow ___ Medium ___ Fast ___ Depth of Flow: ___ in.

Color of Flow: No Flow: ___ Clear ___ Cloudy ___ Suspended Solids ___ Other _____

Blockages: Yes ___ No ___ Sediment in Manhole: Yes ___ No ___ If Yes: Percent of Pipe Filled: ___ %

Floatables: None ___ Sewage ___ Oily Sheen ___ Foam ___ Other _____

Odor: None ___ Sewage ___ Oil ___ Soap ___ Other _____

Field Testing:

pH ___ Temp ___ Spec. Cond. ___ Surfactants: Yes ___ No ___ Ammonia: Yes ___ No ___

Contamination:

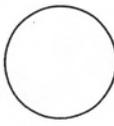
Found During Inspection Yes ___ Check one: ___ Observation ___ Positive Test Kit Result
 No ___ Sandbagged Placed No ___ Yes ___ Give Date _____

Sandbag Checked (Date): _____ Flow was ___ Captured ___ Not Captured: _____

Condition of Manhole:				Common Manholes:		
	Good	Fair	Poor	Comments	High Outlet: Blocked	Yes ___ No ___ NA ___
Grade: At ___ Above ___ Below ___					Lovejoy: Cover Plate in Place	Yes ___ No ___ NA ___
Pavement	_____	_____	_____	_____	Construction Material:	
Cover	_____	_____	_____	_____	Brick	Precast Other
Frame	_____	_____	_____	_____	_____	_____
Corbel	_____	_____	_____	_____	_____	_____
Walls	_____	_____	_____	_____	_____	_____
Floor	_____	_____	_____	_____	_____	_____

Comments: Manhole Correct as Mapped Yes ___ No ___

N↑



Plan of Manhole

Figure 58: Boston Water and Sewer Commission Manhole Inspection Log (Source: Jewell, 2001)

Methods to isolate intermittent discharges in the storm drain network

Intermittent discharges are often challenging to trace in the storm drain network, although four techniques have been used with some success.

Sandbags

This technique involves placement of sandbags or similar barriers within strategic manholes in the storm drain network to form a temporary dam that collects any intermittent flows that may occur. Any flow collected behind the sandbag is then assessed using visual observations or by indicator sampling. Sandbags are lowered on a rope through the manhole to form a dam along the bottom of the storm drain, taking care not to fully block the pipe (in case it rains before the sandbag is retrieved). Sandbags are typically installed at junctions in the network to eliminate contributing branches from further consideration (Figure 59). If no flow collects behind the sandbag, the upstream pipe network can be ruled out as a source of the intermittent discharge.

Sandbags are typically left in place for no more than 48 hours, and should only be installed when dry weather is forecast. Sandbags should not be left in place during a heavy rainstorm. They may cause a blockage in the storm drain, or, they may be washed downstream and lost. The biggest downside to sandbagging is that it requires at least two trips to each manhole.

Optical Brightener Monitoring (OBM) Traps

Optical brightener monitoring (OBM) traps, profiled in Chapter 12, can also be used to detect intermittent flows at manhole junctions. When these absorbent pads are anchored in the pipe to capture dry weather flows, they can be used to determine the presence of flow and/or detergents. These OBM traps are frequently installed by lowering them into an open-grate drop inlet or storm drain inlet, as shown in Figure 60. The pads are then retrieved after 48 hours and are observed under a fluorescent light (this method is most reliable for undiluted washwaters).

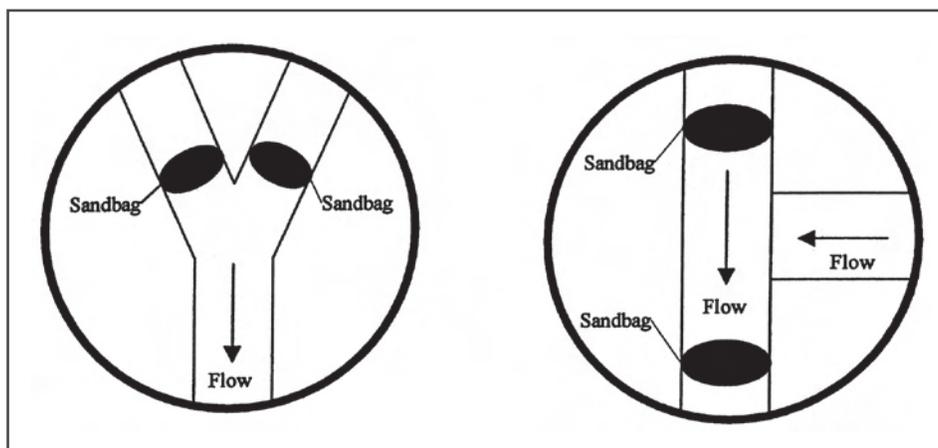


Figure 59: Example sandbag placement (Source: Jewell, 2001)



Figure 60: Optical Brightener Placement in the Storm Drain
(Source: Sargent and Castonguay, 1998)

Automatic Samplers

A few communities have installed automated samplers at strategic points within the storm drain network system that are triggered by small dry weather flows and collect water quality samples of intermittent discharges. Automated sampling can be extremely expensive, and is primarily used in very complex drainage areas that have severe intermittent discharge problems. Automated samplers can pinpoint the specific date and hours when discharges occur, and characterize its chemical composition, which can help crews fingerprint the generating source.

Observation of Deposits or Stains

Intermittent discharges often leave deposits or stains within the storm drain pipe or manhole after they have passed. Thus, crews should note whether any deposits or stains are present in the manhole, even if no dry weather flow is observed. In some cases, the origin of the discharge can be surmised by collecting indicator samples in the water ponded within the manhole sump. Stains and deposits, however, are not always a conclusive way to trace intermittent discharges in the storm drain network.

13.2 Drainage Area Investigations

The source of some illicit discharges can be determined through a survey or analysis of the drainage area of the problem outfall. The simplest approach is a rapid windshield survey of the drainage area to find the potential discharger or generating sites. A more sophisticated approach relies on an analysis of available GIS data and permit databases to identify industrial or other generating sites. In both cases, drainage area investigations are only effective if the discharge observed at an outfall has distinct or unique characteristics that allow crews to quickly ascertain the probable operation or business that is generating it. Often, discharges with a unique color, smell, or off-the-chart indicator sample reading may point to a specific industrial or commercial source. Drainage area investigations are not helpful in tracing sewage discharges, since they are often not always related to specific land uses or generating sites.

Rapid Windshield Survey

A rapid drive-by survey works well in small drainage areas, particularly if field crews are already familiar with its business operations. Field crews try to match the characteristics of the discharge to the most likely type of generating site, and then inspect all of the sites of the same type within the drainage area until the culprit is found. For example, if fuel is observed at an outfall, crews might quickly check every business operation in the catchment that stores or dispenses fuel. Another example is illustrated in Figure 61 where extremely dense algal growth was observed in a small stream during the winter. Field crews were aware of a fertilizer storage site in the drainage area, and a quick inspection identified it as the culprit.



Figure 61: Symptom (left): Discoloration of stream; Diagnosis: Extra hydroseed leftover from an upstream application (middle) was dumped into a storm drain by municipal officials (right).

A third example of the windshield survey approach is shown in Figure 62, where a very thick, sudsy and fragrant discharge was noted at a small outfall. The discharge appeared to consist of wash water, and the only commercial laundromat found upstream was confirmed to be the source. On-site testing may still be needed to identify the specific plumbing or connection generating the discharge.

Detailed Drainage Area Investigations

In larger or more complex drainage areas, GIS data can be analyzed to pinpoint the source of a discharge. If only general land use data exist, maps can at least highlight suspected industrial areas. If more detailed SIC code data are available digitally, the GIS can be used to pull up specific hotspot

operations or generating sites that could be potential dischargers. Some of the key discharge indicators that are associated with hotspots and specific industries are reviewed in Appendix K.

13.3 On-site Investigations

On-site investigations are used to pinpoint the exact source or connection producing a discharge within the storm drain network. The three basic approaches are dye, video and smoke testing. While each approach can determine the actual source of a discharge, each needs to be applied under the right conditions and test limitations (see Table 56). It should be noted that on-site investigations are not particularly effective in finding *indirect* discharges to the storm drain network.



Figure 62: The sudsy, fragrant discharge (left) indicates that the laundromat is the more likely culprit than the florist (right).

Table 56: Techniques to Locate the Discharge		
Technique	Best Applications	Limitations
Dye Testing	<ul style="list-style-type: none"> Discharge limited to a very small drainage area (<10 properties is ideal) Discharge probably caused by a connection from an individual property Commercial or industrial land use 	<ul style="list-style-type: none"> May be difficult to gain access to some properties
Video Testing	<ul style="list-style-type: none"> Continuous discharges Discharge limited to a single pipe segment Communities who own equipment for other investigations 	<ul style="list-style-type: none"> Relatively expensive equipment Cannot capture non-flowing discharges Often cannot capture discharges from pipes submerged in the storm drain
Smoke Testing	<ul style="list-style-type: none"> Cross-connection with the sanitary sewer Identifying other underground sources (e.g., leaking storage techniques) caused by damage to the storm drain 	<ul style="list-style-type: none"> Poor notification to public can cause alarm Cannot detect all illicit discharges

TIP

The Wayne County Department of the Environment provides excellent training materials on on-site investigations, as well as other illicit discharge techniques. More information about this training can be accessed from their website: http://www.wcdoe.org/Watershed/Programs___Srvcs_/IDEP/idep.htm.



Figure 63: Dye Testing Plumbing (NEIWPCC, 2003)

Dye Testing

Dye testing is an excellent indicator of illicit connections and is conducted by introducing non-toxic dye into toilets, sinks, shop drains and other plumbing fixtures (see Figure 63). The discovery of dye in the storm drain, rather than the sanitary sewer, conclusively determines that the illicit connection exists.

Before commencing dye tests, crews should review storm drain and sewer maps to identify lateral sewer connections and how they can be accessed. In addition, property owners must be notified to obtain entry permission. For industrial or commercial properties, crews should carry a letter to document their legal authority to gain

access to the property. If time permits, the letter can be sent in advance of the dye testing. For residential properties, communication can be more challenging. Unlike commercial properties, crews are not guaranteed access to homes, and should call ahead to ensure that the owner will be home on the day of testing.

Communication with other local agencies is also important since any dye released to the storm drain could be mistaken for a spill or pollution episode. To avoid a costly and embarrassing response to a false alarm,

crews should contact key spill response agencies using a “quick fax” that describes when and where dye testing is occurring (Tuomari and Thomson, 2002). In addition, crews should carry a list of phone numbers to call spill response agencies in the event dye is released to a stream.

At least two staff are needed to conduct dye tests – one to flush dye down the plumbing fixtures and one to look for dye in the downstream manhole(s). In some cases,

three staff may be preferred, with two staff entering the private residence or building for both safety and liability purposes.

The basic equipment to conduct dye tests is listed in Table 57 and is not highly specialized. Often, the key choice is the type of dye to use for testing. Several options are profiled in Table 58. In most cases, liquid dye is used, although solid dye tablets can also be placed in a mesh bag and lowered into the manhole on a rope (Figure 64). If a

Table 57: Key Field Equipment for Dye Testing

(Source: Wayne County, MI, 2000)

Maps, Documents

- Sewer and storm drain maps (sufficient detail to locate manholes)
- Site plan and building diagram
- Letter describing the investigation
- Identification (e.g., badge or ID card)
- Educational materials (to supplement pollution prevention efforts)
- List of agencies to contact if the dye discharges to a stream.
- Name of contact at the facility

Equipment to Find and Lift the Manhole Safely (small manhole often in a lawn)

- Probe
- Metal detector
- Crow bar
- Safety equipment (hard hats, eye protection, gloves, safety vests, steel-toed boots, traffic control equipment, protective clothing, gas monitor)

Equipment for Actual Dye Testing and Communications

- 2-way radio
- Dye (liquid or “test strips”)
- High powered lamps or flashlights
- Water hoses
- Camera



Figure 64: Dye in a mesh bag is placed into an upstream manhole (left); Dye observed at a downstream manhole traces the path of the storm drain (right)

longer pipe network is being tested, and dye is not expected to appear for several hours, charcoal packets can be used to detect the dye (GCHD, 2002). Charcoal packets can be secured and left in place for a week or two, and then analyzed for the presence of dye. Instructions for using charcoal packets in dye testing can be accessed at the following website: <http://bayinfo.tamug.tamu.edu/gbeppubs/ms4.pdf>.

The basic drill for dye tests consists of three simple steps. First, flush or wash dye down the drain, fixture or manhole. Second, pop open downgradient sanitary sewer manholes and check to see if any dye appears. If none is detected in the sewer manhole after an hour or so, check downgradient storm drain manholes or outfalls for the presence of dye. Although dye testing is fairly straightforward, some tips to make testing go more smoothly are offered in Table 59.

Table 58: Dye Testing Options

Product	Applications
Dye Tablets	<ul style="list-style-type: none"> • Compressed powder, useful for releasing dye over time • Less messy than powder form • Easy to handle, no mess, quick dissolve • Flow mapping and tracing in storm and sewer drains • Plumbing system tracing • Septic system analysis • Leak detection
Liquid Concentrate	<ul style="list-style-type: none"> • Very concentrated, disperses quickly • Works well in all volumes of flow • Recommended when metering of input is required • Flow mapping and tracing in storm and sewer drains • Plumbing system tracing • Septic system analysis • Leak detection
Dye Strips	<ul style="list-style-type: none"> • Similar to liquid but less messy
Powder	<ul style="list-style-type: none"> • Can be very messy and must dissolve in liquid to reach full potential • Recommended for very small applications or for very large applications where liquid is undesirable • Leak detection
Dye Wax Cakes	<ul style="list-style-type: none"> • Recommended for moderate-sized bodies of water • Flow mapping and tracing in storm and sewer drains
Dye Wax Donuts	<ul style="list-style-type: none"> • Recommended for large sized bodies of water (lakes, rivers, ponds) • Flow mapping and tracing in storm and sewer drains • Leak detection

Table 59: Tips for Successful Dye Testing
(Adapted from Tuomari and Thompson, 2002)

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.

Video Testing

Video testing works by guiding a mobile video camera through the storm drain pipe to locate the actual connection producing an illicit discharge. Video testing shows flows and leaks within the pipe that may indicate an illicit discharge, and can show cracks and other pipe damage that enable sewage or contaminated water to flow into the storm drain pipe.

Video testing is useful when access to properties is constrained, such as residential neighborhoods. Video testing can also be expensive, unless the community already owns and uses the equipment for sewer inspections. This technique will not detect all types of discharges, particularly when the illicit connection is not flowing at the time of the video survey.

Different types of video camera equipment are used, depending on the diameter and condition of the storm sewer being tested.

Field crews should review storm drain maps, and preferably visit the site before selecting the video equipment for the test. A field visit helps determine the camera size needed to fit into the pipe, and if the storm drain has standing water.

In addition to standard safety equipment required for all manhole inspections, video testing requires a Closed-Circuit Television (CCTV) and supporting items. Many commercially available camera systems are specifically adapted to televise storm sewers, ranging from large truck or van-mounted systems to much smaller portable cameras. Cameras can be self-propelled or towed. Some specifications to look for include:

- The camera should be capable of radial view for inspection of the top, bottom, and sides of the pipe and for looking up lateral connections.
- The camera should be color.
- Lighting should be supplied by a lamp on the camera that can light the entire periphery of the pipe.

When inspecting the storm sewer, the CCTV is oriented to keep the lens as close as possible to the center of the pipe. The camera can be self-propelled through the pipe using a tractor or crawler unit or it may be towed through on a skid unit (see Figures 65 and 66). If the storm drain



Figure 65: Camera being towed

has ponded water, the camera should be attached to a raft, which floats through the storm sewer from one manhole to the next. To see details of the sewer, the camera and lights should be able to swivel both horizontally and vertically. A video record of the inspection should be made for future reference and repairs (see Figure 67).

Smoke Testing

Smoke testing is another “bottom up” approach to isolate illicit discharges. It works by introducing smoke into the storm drain system and observing where the smoke surfaces. The use of smoke testing to detect illicit discharges is a relatively new application, although many communities have used it to check for infiltration and inflow into their sanitary sewer network. Smoke testing can find improper

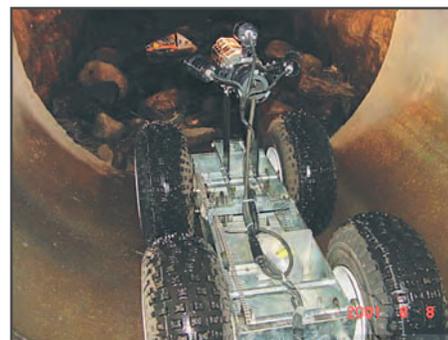


Figure 66: Tractor-mounted camera

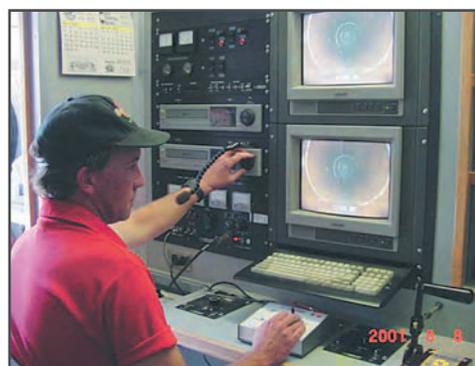


Figure 67: Review of an inspection video

connections, or damage to the storm drain system (Figure 68). This technique works best when the discharge is confined to the upper reaches of the storm drain network, where pipe diameters are too small for video testing and gaining access to multiple properties renders dye testing infeasible.

Notifying the public about the date and purpose of smoke testing before starting is critical. The smoke used is non-toxic, but can cause respiratory irritation, which can be a problem for some residents. Residents should be notified at least two weeks prior to testing, and should be provided the following information (Hurco Technologies, Inc., 2003):

- Date testing will occur
- Reason for smoke testing
- Precautions they can take to prevent smoke from entering their homes or businesses
- What they need to do if smoke enters their home or business, and any health concerns associated with the smoke
- A number residents can call to relay any particular health concerns (e.g., chronic respiratory problems)

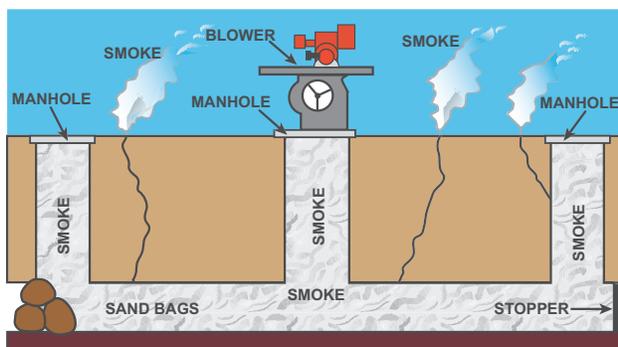


Figure 68: Smoke Testing System Schematic

Program managers should also notify local media to get the word out if extensive smoke testing is planned (e.g., television, newspaper, and radio). On the actual day of testing, local fire, police departments and 911 call centers should be notified to handle any calls from the public (Hurco Technologies, Inc., 2003).

The basic equipment needed for smoke testing includes manhole safety equipment, a smoke source, smoke blower, and sewer plugs. Two smoke sources can be used for smoke testing. The first is a smoke “bomb,” or “candle” that burns at a controlled rate and releases very white smoke visible at relatively low concentrations (Figure 69). Smoke bombs are suspended beneath a blower in a manhole. Candles are available in 30 second to three minute sizes. Once opened, smoke bombs should be kept in a dry location and should be used within one year.

The second smoke source is liquid smoke, which is a petroleum-based product that is injected into the hot exhaust of a blower where it is heated and vaporized (Figure 70). The length of smoke production can vary depending on the length of the pipe being



Figure 69: Smoke Candles



Figure 70: Smoke blower

tested. In general, liquid smoke is not as consistently visible and does not travel as far as smoke from bombs (USA Blue Book).

Smoke blowers provide a high volume of air that forces smoke through the storm drain pipe. Two types of blowers are commonly used: “squirrel cage” blowers and direct-drive propeller blowers. Squirrel cage blowers are large and may weigh more than 100 pounds, but allow the operator to generate more controlled smoke output. Direct-drive propeller blowers are considerably lighter and more compact, which allows for easier transport and positioning.

Three basic steps are involved in smoke testing. First, the storm drain is sealed off by plugging storm drain inlets. Next, the smoke is released and forced by the blower through the storm drain system. Lastly, the crew looks for any escape of smoke above-ground to find potential leaks.

One of three methods can be used to seal off the storm drain. Sandbags can be lowered into place with a rope from the street surface. Alternatively, beach balls that have a diameter slightly larger than the drain can be inserted into the pipe. The beach ball is then placed in a mesh bag with a

rope attached to it so it can be secured and retrieved. If the beach ball gets stuck in the pipe, it can simply be punctured, deflated and removed. Finally, expandable plugs are available, and may be inserted from the ground surface.

Blowers should be set up next to the open manhole after the smoke is started. Only one manhole is tested at a time. If smoke candles are used, crews simply light the candle, place it in a bucket, and lower it in the manhole. The crew then watches to see where smoke escapes from the pipe. The two most common situations that indicate an illicit discharge are when smoke is seen rising from internal plumbing fixtures (typically reported by residents) or from sewer vents. Sewer vents extend upward from the sewer lateral to release gas buildup, and are not supposed to be connected to the storm drain system.

13.4 Septic System Investigations

The techniques for tracing illicit discharges are different in rural or low-density residential watersheds. Often, these watersheds lack sanitary sewer service and storm water is conveyed through ditches or swales, rather than enclosed pipes. Consequently, many illicit discharges enter the stream as indirect discharges, through surface breakouts of septic fields or through straight pipe discharges from bypassed septic systems.

The two broad techniques used to find individual septic systems—on-site investigations and infrared imagery—are described in this section.

On-Site Septic Investigations

Three kinds of on-site investigations can be performed at individual properties to determine if the septic system is failing, including homeowner survey, surface condition analysis and a detailed system inspection. The first two investigations are rapid and relatively simple assessments typically conducted in targeted watershed areas. Detailed system inspections are a much more thorough investigation of the functioning of the septic system that is conducted by a certified professional. Detailed system inspections may occur at time of sale of a property, or be triggered by poor scores on the rapid homeowner survey or surface condition analysis.

Homeowner Survey

The homeowner survey consists of a brief interview with the property owner to determine the potential for current or future failure of the septic system, and is often done in conjunction with a surface condition analysis.

Table 60 highlights some common questions to ask in the survey, which inquire about resident behaviors, system performance and maintenance activity.

Surface Condition Analysis

The surface condition analysis is a rapid site assessment where field crews look for obvious indicators that point to current or potential production of illicit discharges by the septic system (Figure 71). Some of the key surface conditions to analyze have been described by Andrews *et al.*, (1997) and are described below:

- Foul odors in the yard
- Wet, spongy ground; lush plant growth; or burnt grass near the drain field
- Algal blooms or excessive weed growth in adjacent ditches, ponds and streams
- Shrubs or trees with root damage within 10 feet of the system
- Cars, boats, or other heavy objects located over the field that could crush lateral pipes
- Storm water flowing over the drain field
- Cave-ins or exposed system components
- Visible liquid on the surface of the drain field (e.g., surface breakouts)
- Obvious system bypasses (e.g., straight pipe discharges)

Table 60: Septic System Homeowner Survey Questions

(Adapted from Andrews *et al.*, 1997 and Holmes Inspection Services)

- How many people live in the house?¹
- What is the septic tank capacity?²
- Do drains in the house empty slowly or not at all?
- When was the last time the system was inspected or maintained?
- Does sewage back up into the house through drain lines?
- Are there any wet, smelly spots in the yard?
- Is the septic tank effluent piped so it drains to a road ditch, a storm sewer, a stream, or is it connected to a farm drain tile?

¹ Water usage ranges from 50 to 100 gallons per day per person. This information can be used to estimate the wastewater load from the house (Andrews *et. al.*, 1997).

² The septic tank should be large enough to hold two days' worth of wastewater (Andrews *et. al.*, 1997).

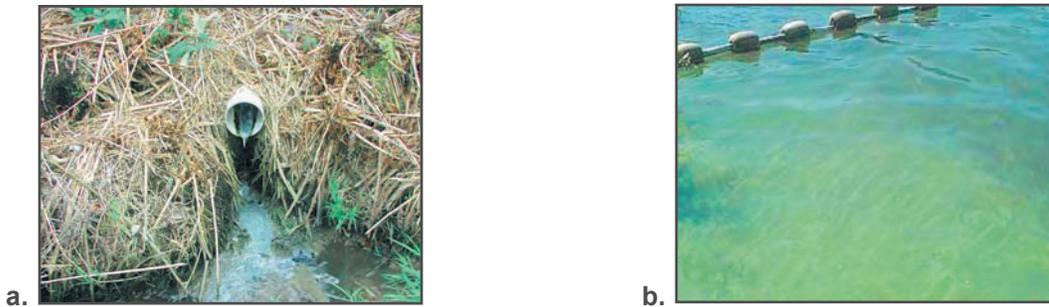


Figure 71: (a) Straight pipe discharge to nearby stream. (b) Algal bloom in a nearby pond.
(Sources: a- Snohomish County, WA, b- King County, WA)

Detailed System Inspection

The detailed system inspection is a much more thorough inspection of the performance and function of the septic system, and must be completed by a certified professional. The inspector certifies the structural integrity of all components of the system, and checks the depth of solids in the septic tank to determine if the system needs to be pumped out. The inspector also sketches the system, and estimates distance to groundwater, surface water, and drinking water sources. An example septic system inspection form from Massachusetts can be found at <http://www.state.ma.us/dep/brp/wwm/soilsys.htm>.

Although not always incorporated into the inspection, dye testing can sometimes point to leaks from broken pipes, or direct discharges through straight pipes that might be missed during routine inspection. Dye can be introduced into plumbing fixtures in the home, and flushed with sufficient running water. The inspector then watches the septic field, nearby ditches, watercourses and manholes for any signs of the dye. The

dye may take several hours to appear, so crews may want to place charcoal packets in adjacent waters to capture dye until they can return later to retrieve them.

Infrared Imagery

Infrared imagery is a special type of photography with gray or color scales that represent differences in temperature and emissivity of objects in the image (www.stocktoninfrared.com), and can be used to locate sewage discharges. Several different infrared imagery techniques can be used to identify illicit discharges. The following discussion highlights two of these: aerial infrared thermography¹³ and color infrared aerial photography.

Infrared Thermography

Infrared thermography is increasingly being used to detect illicit discharges and failing septic systems. The technique uses the temperature difference of sewage as a marker to locate these illicit discharges. Figure 72 illustrates the thermal difference

¹³ Infrared thermography is also being used by communities such as Mecklenburg County and the City of Charlotte in NC to detect illicit discharges at outfalls.

between an outfall discharge (with a higher temperature) and a stream.

The equipment needed to conduct aerial infrared thermography includes an aircraft (plane or helicopter); a high-resolution, large format, infrared camera with appropriate mount; a GPS unit; and digital recording equipment. If a plane is used, a higher resolution camera is required since it must operate at higher altitudes. Pilots should be experienced since flights take place at night, slowly, and at a low altitude. The camera may be handheld, but a mounted camera will provide significantly clearer results for a larger area. The GPS can be combined with a mobile mapping program and a video encoder-decoder that encodes and displays the coordinates, date, and time (Stockton, 2000). The infrared data are analyzed after the flight by trained analysts to locate suspected discharges, and field crews then inspect the ground-truthed sites to confirm the presence of a failing septic system.

Late fall, winter, and early spring are typically the best times of year to conduct these investigations in most regions of the



Figure 72: Aerial thermography showing sewage leak

country. This allows for a bigger difference between receiving water and discharge temperatures, and interference from vegetation is minimized (Stockton, 2004b). In addition, flights should take place at night to minimize reflected and direct daylight solar radiation that may adversely affect the imagery (Stockton, 2004b).

Color Infrared Aerial Photography

Color infrared aerial photography looks for changes in plant growth, differences in soil moisture content, and the presence of standing water on the ground to primarily identify failing septic systems (Figure 73).

The Tennessee Valley Authority (TVA) uses color infrared aerial photography to detect failing septic systems in reservoir watersheds. Local health departments conduct follow-up ground-truthing surveys to determine if a system is actually failing (Sagona, 1986). Similar to thermography, it is recommended that flights take place at night, during leaf-off conditions, or when the water table is at a seasonal high (which is when most failures typically occur (U.S. EPA, 1999).

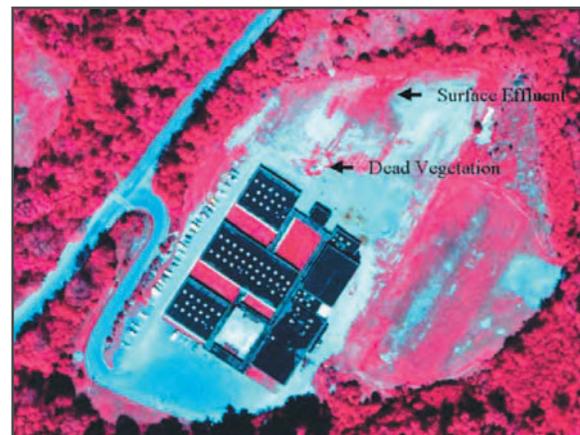


Figure 73: Dead vegetation and surface effluent are evidence of a septic system surface failure.

(Source: U.S. EPA, 1999)

13.5 The Cost to Trace Illicit Discharge Sources

Tracing illicit discharges to their source can be an elusive and complex process, and precise staffing and budget data are difficult to estimate. Experience of Phase I NPDES communities that have done these investigations in the past can shed some light on cost estimates. Some details on unit costs for common illicit discharge investigations are provided below.

Costs for Dye, Video, and Smoke Testing

The cost of smoke, dye, and video testing can be substantial and staff intensive, and

often depend on investigation specific factors, such as the complexity of the drainage network, density and age of buildings, and complexity of land use. Wayne County, MI, has estimated the cost of dye testing at \$900 per facility. Video testing costs range from \$1.50 to \$2.00 per foot, although this increases by \$1.00 per foot if pipe cleaning is needed prior to testing.

Table 61 summarizes the costs of start-up equipment for basic manhole entry and inspection, which is needed regardless of which type of test is performed. Tables 62 through 64 provide specific equipment costs for dye, video and smoke testing, respectively.

Table 61: Common Field Equipment Needed for Dye, Video, and Smoke Testing	
Item	Cost
1 Digital Camera	\$200
Clipboards, Pens, Batteries	\$25
1 Field vehicle	\$15,000 - \$35,000
1 First aid kit	\$30
1 Spotlight	\$40
1 Gas monitor and probe	\$900 - \$2,100
1 Hand-held GPS Unit	\$150
2 Two-way radios	\$250 - \$750
1 Manhole hook	\$80 - \$130
1 Mirror	\$70 - \$130
2 Reflective safety vests	\$40
Rubber/latex gloves (box of 100)	\$25
1 Can of Spray Paint	\$5
4 Traffic Cones	\$50

Table 62: Equipment Costs for Dye Testing

Product	Water Volume	Cost
Dye Strips	1 strip/500 gallons	\$75 – \$94 per 100 strips
Dye Tablets	0 – 50,000 gallons	\$40 per 200 tablets
Liquid Concentrate (Rhodamine WT)	0 – 50,000 gallons	\$80 – \$90 per gallon \$15 – \$20 per pint
Powder	50,000 + gallons	\$77 per lb
Dye Wax Cakes	20,000 – 50,000 gallons	\$12 per one 1.25 ounce cake
Dye Wax Donuts	50,000 + gallons	\$104 – \$132 per 42 oz. donut
<i>Price Sources:</i> Aquatic Eco-Systems http://www.aquaticceco.com/ Cole Parmer http://www.coleparmer.com USA Blue Book http://www.usabluebook.com		

Table 63: Equipment Costs for Video Testing

Equipment	Cost
GEN-EYE 2™ B&W Sewer Camera with VCR & 200' Push Cable	\$5,800
100' Push Rod and Reel Camera for 2" – 10" Pipes	\$5,300
200' Push Rod and Reel Camera for 8" – 24" Pipes	\$5,800
Custom Saturn III Inspection System 500' cable for 6-16" Lines	\$32,000 (\$33,000 with 1000 foot cable)
OUTPOST	
• Box with build-out	\$6,000
• Generator	\$2,000
• Washdown system	\$1,000
Video Inspection Trailer	
• 7'x10' trailer & build-out	\$18,500
• Hardware and software package	\$15,000
• Incidentals	\$5,000
Sprinter Chassis Inspection Vehicle	
• Van (with build-out for inspecting 6" – 24" pipes)	\$130,000
• Crawler (needed to inspect pipes >24")	\$18,000
• Software upgrade (optional but helpful for extensive pipe systems)	\$8,000
<i>Sources: USA Blue Book and Envirotech</i>	

Table 64: Equipment Costs for Smoke Testing

Equipment	Cost
Smoke Blower	\$1,000 to \$2,000 each
Liquid Smoke	\$38 to \$45 per gallon
Smoke Candles, 30 second (4,000 cubic feet)	\$27.50 per dozen
Smoke Candles, 60 Second (8,000 cubic feet)	\$30.50 per dozen
Smoke Candles, 3 Minute (40,000 cubic feet)	\$60.00 per dozen
<i>Sources: Hurco Tech, 2003 and Cherne Industries, 2003</i>	

Costs for Septic System Investigations

Most septic system investigations are relatively low cost, but factors such as private property access, notification, and the total number of sites investigated can increase costs. Unit costs for the three major septic system investigations are described below.

Homeowner Survey and Surface Condition Analysis

Both the homeowner survey and the surface condition analysis are relatively low cost investigation techniques. Assuming that a staff person can investigate one home per hour, the average cost per inspection is approximately \$25. A substantial cost savings can be realized by using interns or volunteers to conduct these simple investigations.

Detailed System Inspection

Septic system inspections are more expensive, but a typical unit cost is about \$250, and may also include an additional cost of pumping the system, at roughly \$150, if pumping is required to complete the inspection (Wayne County, 2003). This cost is typically charged to the homeowner as part of a home inspection.

Aerial Infrared Thermography

The equipment needed to conduct aerial infrared thermography is expensive; cameras alone may range from \$250,000 to \$500,000 (Stockton, 2004a). However, private contractors provide this service. In general, the cost to contract an aerial infrared thermography investigation depends on the length of the flight (flights typically follow streams or rivers); how difficult it will be to fly the route; the number of heat anomalies expected to be encountered; the expected post-flight processing time (typically, four to five hours of analysis for every hour flown); and the distance of the site from the plane's "home" (Stockton, 2004a). The cost range is typically \$150 to \$400 per mile of stream or river flown, which includes the flight and post-flight analyses (Stockton, 2004a).

As an alternative, local police departments may already own an infrared imaging system that may be used. For instance, the Arkansas Department of Health used a state police helicopter with a Forward Looking Infrared (FLIR) imaging system, GPS, video equipment, and maps (Eddy, 2000). The disadvantage to this is that the equipment may not be available at optimal times to conduct the investigation. In addition, infrared imaging equipment used by police departments may not be sensitive enough to detect the narrow range of temperature difference (only a few degrees) often expected for sewage flows (Stockton, 2004a).

Appendix B:

Illicit Discharge Report Documentation Form

(See form in SWMP)

Illicit Discharge Report Documentation Form

Jefferson County Stormwater Coalition

Updated: 2024

Refer to Enforcement Response Plan (ERP) for details on procedures

Compliance Achieved: / /

Complaint Closed: / /

Current Level of Response:

- Level 1: No Enforcement Action
- Level 2: Informal Response
- Level 3: Formal Response
- Level 4: Referral To Other Agencies

Initial Report:

Date/Time: _____

Reporting Party: _____

Contact information: _____

Details: _____

Location Address or Lat/ Long: _____

Based on Report Investigation Must Commence Within:	<input type="checkbox"/> 2 Hours (immediate threat to environment/ human health)
	<input type="checkbox"/> 24 Hours (complaints describing muddy/ discolored waterbody)
	<input type="checkbox"/> 2 Days (other complaints associated with active construction sites)
	<input type="checkbox"/> 5 Days (poorly functioning stormwater infrastructure)

Photos: (if applicable)

Follow-up:

Initial Investigation:

Findings: _____

Photos:

Initial Contact:

Date & Time of Contact: _____

Staff Member Who Initiated Contact: _____

Responsible Party: _____

Contact Information: _____

Content of Conversation: _____

Date and Time of Scheduled On-Site Meeting: _____

(required unless no illicit discharge was found)

Site Meeting:

Meeting Location: _____

Date and time of Meeting: _____

Meeting Attendees: _____

Content of Conversation: _____

Agreements Made: _____

Schedule of Anticipated/Needed Compliance: (if a violation is determined) _____

Formal Responses issued:

Notice of Violation
Date issued:

Compliance Order
Date issued:

Stop Work Order
Date issued:

Issuance of Municipal Ticket
Date issued:

Has the issue been referred to other agencies? y/n

If so, who and on what date? _____

Other notes (including details and dates of follow-up inspections):

Appendix C:

Monitoring Locations Inspection and Sampling Field Sheet

(see next page)

Monitoring Locations Inspection and Sampling Field Sheet

Section 1: Background Data

Subwatershed:		Monitoring Location ID:	
Today's date:		Time (Military):	
Investigators:		Form completed by:	
Temperature (°F):	Rainfall (in.):	Last 24 hours:	Last 48 hours:
Latitude:	Longitude:	GPS Unit:	GPS LMK #:
Camera:		Photo #s:	
Land Use in Drainage Area (Check all that apply):			
<input type="checkbox"/> Industrial <input type="checkbox"/> Ultra-Urban Residential <input type="checkbox"/> Suburban Residential <input type="checkbox"/> Commercial		<input type="checkbox"/> Open Space <input type="checkbox"/> Institutional Other: _____ Known Industries: _____	
Notes (e.g., origin, if known):			

Section 2: Monitoring Location Description

LOCATION	MATERIAL	SHAPE	DIMENSIONS (IN.)	SUBMERGED
<input type="checkbox"/> Closed Pipe	<input type="checkbox"/> RCP <input type="checkbox"/> CMP <input type="checkbox"/> PVC <input type="checkbox"/> HDPE <input type="checkbox"/> Steel <input type="checkbox"/> Other: _____	<input type="checkbox"/> Circular <input type="checkbox"/> Single <input type="checkbox"/> Elliptical <input type="checkbox"/> Double <input type="checkbox"/> Box <input type="checkbox"/> Triple <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____	Diameter/Dimensions: _____	In Water: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully With Sediment: <input type="checkbox"/> No <input type="checkbox"/> Partially <input type="checkbox"/> Fully
<input type="checkbox"/> Open drainage	<input type="checkbox"/> Concrete <input type="checkbox"/> Earthen <input type="checkbox"/> Rip-Rap <input type="checkbox"/> Other: _____	<input type="checkbox"/> Trapezoid <input type="checkbox"/> Parabolic <input type="checkbox"/> Other: _____	Depth: _____ Top Width: _____ Bottom Width: _____	
<input type="checkbox"/> In-Stream	(applicable when collecting samples)			
Flow Present?	<input type="checkbox"/> Yes <input type="checkbox"/> No		<i>If No, Skip to Section 5</i>	
Flow Description (if present)	<input type="checkbox"/> Trickle <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial			

Section 3: Quantitative Characterization

FIELD DATA FOR FLOWING MONITORING LOCATIONS					
PARAMETER	RESULT	UNIT	EQUIPMENT		
<input type="checkbox"/> Flow #1	Volume		Liter	Bottle	
	Time to fill		Sec		
<input type="checkbox"/> Flow #2	Flow depth		In	Tape measure	
	Flow width	____' ____"	Ft, In	Tape measure	
	Measured length	____' ____"	Ft, In	Tape measure	
	Time of travel		S	Stopwatch	
Temperature			°F	Thermometer	
pH			pH Units	Test strip/Probe	
Ammonia			mg/L	Test strip	

Monitoring Locations Inspection and Sampling Field Sheet

Section 4: Physical Indicators for Flowing Monitoring Locations Only

Are Any Physical Indicators Present in the flow? Yes No (If No, Skip to Section 5)

INDICATOR	CHECK if Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)		
Odor	<input type="checkbox"/>	<input type="checkbox"/> Sewage <input type="checkbox"/> Rancid/sour <input type="checkbox"/> Petroleum/gas <input type="checkbox"/> Sulfide <input type="checkbox"/> Other:	<input type="checkbox"/> 1 - Faint	<input type="checkbox"/> 2 – Easily detected	<input type="checkbox"/> 3 – Noticeable from a distance
Color	<input type="checkbox"/>	<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 flow
Turbidity	<input type="checkbox"/>	See severity	<input type="checkbox"/> 1 – Slight cloudiness	<input type="checkbox"/> 2 - Cloudy	<input type="checkbox"/> 3 – Opaque
Floatables -Does Not Include Trash!!	<input type="checkbox"/>	<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 (e.g., possible suds or oil sheen)	<input type="checkbox"/> 3 - Some; origin clear (e.g., obvious oil sheen, suds, or floating sanitary materials)

Section 5: Physical Indicators for Both Flowing and Non-Flowing Monitoring Locations

Are physical indicators that are not related to flow present? Yes No (If No, Skip to Section 6)

INDICATOR	CHECK if Present	DESCRIPTION	COMMENTS
Monitoring Location Damage	<input type="checkbox"/>	<input type="checkbox"/> Spalling, Cracking or Chipping <input type="checkbox"/> Peeling Paint <input type="checkbox"/> Corrosion	
Deposits/Stains	<input type="checkbox"/>	<input type="checkbox"/> Oily <input type="checkbox"/> Flow Line <input type="checkbox"/> Paint <input type="checkbox"/> Other:	
Abnormal Vegetation	<input type="checkbox"/>	<input type="checkbox"/> Excessive <input type="checkbox"/> Inhibited	
Poor pool quality	<input type="checkbox"/>	<input type="checkbox"/> Odors <input type="checkbox"/> Colors <input type="checkbox"/> Floatables <input type="checkbox"/> Oil Sheen <input type="checkbox"/> Suds <input type="checkbox"/> Excessive Algae <input type="checkbox"/> Other:	
Pipe benthic growth	<input type="checkbox"/>	<input type="checkbox"/> Brown <input type="checkbox"/> Orange <input type="checkbox"/> Green <input type="checkbox"/> Other:	

Section 6: Overall Monitoring Location Characterization

Unlikely Potential (presence of two or more indicators) Suspect (one or more indicators with a severity of 3) Obvious

Section 7: Data Collection

1. Sample for the lab?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. If yes, collected from:	<input type="checkbox"/> Flow <input type="checkbox"/> Pool
3. Intermittent flow trap set?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, type: <input type="checkbox"/> OBM <input type="checkbox"/> Caulk dam

Section 8: Any Non-Ilicit Discharge Concerns (e.g., trash or needed infrastructure repairs)?