



## Illicit Discharge Detection and Elimination Program (IDDEP)

**Purpose:** State College Borough recognizes the benefit of eliminating illicit discharge into its Municipal Separate Storm Sewer System (MS4). This document shall be referred to as the official State College Borough Illicit Discharge Detection and Elimination Program (IDDEP). It will facilitate the detection and elimination of non-stormwater discharges, including illegal dumping into the Borough's MS4.

Illicit discharges enter the system through either direct connections (e.g., wastewater piping either mistakenly or deliberately connected to the storm drains) or indirect connections (e.g., infiltration into the MS4 from cracked sanitary systems, spills collected by drain outlets, or other non-stormwater items (such as paint, used oil and wash water) dumped directly into a drain.

**Program Requirements:** Recognizing the adverse effects illicit discharges can have on receiving waters, the Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement and enforce an illicit discharge detection and elimination program. This program must include the following:

- \* **Storm Map** - A storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;
- \* **Ordinance** - Through an ordinance, a prohibition (to the extent allowable under State, Tribal, or local law) on non-stormwater discharges into the MS4, and appropriate enforcement procedures and actions;
- \* **Education** - The education of public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and
- \* **Program** - A plan to detect and address non-stormwater discharges, including illegal dumping, into the MS4.

**Storm Map:** The maps of the Borough of State College storm sewer system include the location of all inlets, outfalls and pipes which is used to determine the extent of any dry-weather flows and the possible source(s).

**Ordinance:** The Borough's Codification of Ordinances, Chapter XIV, Part B, Section 201.d states that it shall be illegal to discharge non-storm water to the Borough-owned separate storm sewer system.

**Education:** Outreach to the target audience regarding ways to detect and eliminate illicit discharges is another integral part of the IDDEP. This outreach may include:

- \* Developing informational materials and guidance documents for the target audiences noted in the PEOP. These materials are located on the Borough's website.
- \* Placing ads for general public regarding illicit discharges.
- \* Using an inlet marking program for storm drains.

**Program:**

- A) Procedure for identifying priority areas** - These are areas with a higher likelihood of illicit discharges, illicit connections or illegal dumping. Priority areas may include the areas with older infrastructure, a concentration of high-risk activities, such as the downtown, or past history of water pollution problems. The Borough maintains a map of the outfalls that are inspected yearly.
- B) Procedure for screening outfalls** - Using its map, Borough staff inspect the outfalls at least once a year during dry weather. Staff also view outfalls during normal periods and when possible during heavy storms.
- C) Procedure for identifying the source** - When an illicit discharge is detected at a regulated outfall, Borough staff immediately begins to trace the source of water using the Borough's comprehensive maps.
- D) Procedure for eliminating an illicit discharge** - Methods used to remove/correct the illicit connections will be site specific. It is noted that education of the general public, residents, business owners, elected officials and contractors will be a significant part of this effort.
- E) Procedure for assessing sewage interactions** - The potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems has been reviewed by the Borough. Only six properties within the Borough remain on septic systems all of which participate in the Centre Region's Pump and Inspect Program, thus minimizing the likelihood of malfunction and interaction with the Borough's MS4.
- F) Procedure for Gaining Access** - Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) are already established since all outfalls are located within either public right-of-way or within an established easement.
- G) Procedure for program documentation, evaluation and assessment** - As a final step, all actions taken under the plan will be documented. Doing this will illustrate that continuous progress is being made to eliminate illicit discharges and connections. This data will also be included as one of the measurable goals achieved in the required annual report. This information documented will include: number of outfalls screened; any complaints received and corrected; the number of discharges and quantities of flow eliminated; and the number of dye tests conducted.

**Does This Measure Need to Address All Illicit Discharges?**

No. The illicit discharge detection and elimination program does not need to address the following categories of non-stormwater discharges or flows unless the operator of the regulated small MS4 identifies them as significant contributors of pollutants to its MS4:

- Discharges from firefighting activities
- Potable water sources including dechlorinated water line and fire hydrant flushing
- Irrigation drainage
- Routine external building wash-down (which does not use detergents or other compounds)
- Air conditioning condensate