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Introduction

Phoenixville Borough is required under its MS4 (Municipal Separate Storm Sewer System) program to develop an Illicit Discharge Detection and Elimination (IDDE) Plan. The purpose of the plan is to satisfy the requirements of Minimum Control Measure #3 under the MS4 program. The IDDE plan outlines the procedures to detect and remove illicit discharges to the MS4.

The Phoenixville MS4 consists of the conveyance or system of conveyances including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, and storm drains or storm sewer system.

Illicit Discharges include any discharge to the MS4 this is prohibited under local, state, or federal statues, ordinances, codes, or regulations. This includes all non-stormwater discharges except discharges pursuant to an NPDES (National Pollutant Discharge Elimination System) permit and discharges that are exempt.

Exempt Discharges

Exempt, as defined in US EPA (EPA 833-F-00-007), discharges include the following:

- Water line flushing  
- Diverted stream flows  
- Uncontaminated ground water infiltration  
- Discharges from potable water sources  
- Air conditioning condensation  
- Springs  
- Footing drains  
- Flows from riparian habitats and wetlands  
- Street wash water.

- Landscape irrigation  
- Rising ground waters  
- Uncontaminated pumped ground water  
- Foundation drains  
- Irrigation water  
- Water from crawl space pumps  
- Lawn watering, individual residential car washing  
- De-chlorinated swimming pool discharges

(The illicit discharge detection and elimination program does not need to address the above categories of non-stormwater discharges or flows unless the borough identifies them as significant contributors of pollutants to its MS4)

Identification of Priority Areas

Priority areas are selected based on the likelihood of illicit connections, which typically are found in areas with older sanitary sewer lines (historic industrial areas and older residential development). The borough’s priority areas are generally defined as those adjacent to / draining to and within approximately one half mile of French Creek.

Illicit discharge detection will be performed in the priority areas, as well as other areas of the borough, as part of the MS4 outfall inspections and during normal daily activities of the borough’s public works staff.
Procedures for Identifying Illicit Discharges / Documentation

Borough public works staff will identify illicit discharges primarily visually through direct observation of illegal discharges, connections or suspect discharges to the stormwater system. Illicit discharge identification during the MS4 outfall inspections will be through visual observations as well as a combination of field and laboratory water quality testing. Illicit discharges can be documented on the form included as Attachment II. Indications of an illicit discharge may include unnatural color, odor, turbidity, surface sheen, floating material and field or laboratory analysis.

Illicit discharge identification may include, but is not limited to, inlet inspections, investigation of contributing areas when suspect pollutants are identified in a stormwater outfall, interviews of residents or businesses near an identified illicit discharge, dye or smoke tests and video inspections.

All incidents and follow up investigations shall be fully documented and kept on file at the borough offices. An Illicit Discharge Tracking Sheet is enclosed as Attachment II.

Procedures for Eliminating Illicit Discharges

When an illicit discharge is identified the appropriate borough staff will work with the discharger to find a solution to the problem and notify them to remove / correct the illicit connection. Although not mandatory or required, this may include offering limited technical assistance for restoration activities.

If deemed appropriate, particularly when voluntary compliance is not timely, the discharger will be notified of an illicit discharge violation and legal action will be initiated through the appropriate local, state, and federal agencies.
Attachment I

Water Quality Contacts
Residents are often the first to notice pollution problems in their communities. These ‘illicit’ discharges can originate from various sources and contribute to degradation of local water ways. The following are situations which should be reported and who to contact:

<table>
<thead>
<tr>
<th>Violation</th>
<th>Who to Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dumping of petroleum products, chemicals, hazard materials to the ground surface or stormwater facilities</td>
<td>Pennsylvania Department of Environmental Protection, (484) 250 5900</td>
</tr>
<tr>
<td>Spills of petroleum products, chemicals or hazard materials</td>
<td>Pennsylvania Department of Environmental Protection, (484) 250 5900</td>
</tr>
<tr>
<td>Sediment leaving a construction site</td>
<td>Chester County Conservation District, (610) 925 4920</td>
</tr>
<tr>
<td>Pollutants in Waterway</td>
<td>Pennsylvania Department of Environmental Protection, (484) 250 5900</td>
</tr>
<tr>
<td>Broken or leaking water mains</td>
<td>Phoenixville Borough, (610) 933 8801</td>
</tr>
<tr>
<td>Sewage effluent discharges</td>
<td>Chester County Health Department (On-lot septic systems), (610) 344 6225 or Phoenixville Borough (Public sewer system), (610) 933 8801</td>
</tr>
<tr>
<td>Fish kills</td>
<td>Pennsylvania Fish Commission, (717) 626 0228 or Pennsylvania Department of Environmental Protection, (484) 250 5900</td>
</tr>
</tbody>
</table>
Attachment II

Illicit Discharge Tracking Sheet
### Illicit Discharge Tracking Sheet

#### Responder Information
- **Information taken by:**       **Incident date:**
- **Time:**       **Precipitation (inches) in past 24-48 hrs:**

#### Reporter Information
- **Incident time:**       **Incident date:**
- **Contact information (optional):**

#### Incident Location *(complete one or more below)*
- **Latitude and longitude:**
- **Stream address or outfall #:**
- **Closest street address:**
- **Nearby landmark:**

#### Primary Location Description
- **Stream corridor** *(In or adjacent to stream)*
- **Upland area** *(Land not adjacent to stream)*

#### Secondary Location Description
- **Outfall**
- **In-stream flow**
- **Along banks**
- **Near storm drain**
- **Near other water source (storm water pond, wetland, etc.):**

#### Narrative description of location:

#### Upland Problem Indicator Description
- **Dumping**
- **Oil/solvents/chemicals**
- **Sewage**
- **Wash water, suds, etc.**
- **Other:** _____________________________

#### Stream Corridor Problem Indicator Description
- **Odor**
  - **None**
  - **Sulfide (rotten eggs); natural gas**
  - **Sewage**
  - **Rancid/Sour**
  - **Petroleum (gas)**
  - **Other: Describe in “Narrative” section**
<table>
<thead>
<tr>
<th>Appearance</th>
<th>“Normal”</th>
<th>Oil sheen</th>
<th>Cloudy</th>
<th>Suds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Other: Describe in “Narrative” section</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Floatables</td>
<td>None:</td>
<td>Sewage (toilet paper, etc)</td>
<td>Algae</td>
<td>Dead fish</td>
</tr>
<tr>
<td></td>
<td>Other: Describe in “Narrative” section</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Narrative description of problem indicators:**

**Suspected Violator (name, personal or vehicle description, license plate #, etc.):**

**Investigation Notes**

<table>
<thead>
<tr>
<th>Initial investigation date:</th>
<th>Investigators:</th>
</tr>
</thead>
<tbody>
<tr>
<td>No investigation made</td>
<td>Reason:</td>
</tr>
<tr>
<td>Referred to different department/agency:</td>
<td>Department/Agency:</td>
</tr>
<tr>
<td>Investigated: No action necessary</td>
<td></td>
</tr>
<tr>
<td>Investigated: Requires action</td>
<td>Description of actions:</td>
</tr>
<tr>
<td>Hours between call and investigation:</td>
<td>Hours to close incident:</td>
</tr>
<tr>
<td>Date case closed:</td>
<td></td>
</tr>
</tbody>
</table>

Notes: