

MCM #3: Illicit Discharge Detection and Elimination (IDDE)

- **BMP:** Continue to develop the storm sewer system map
- **BMP:** Illicit discharge detection and elimination reporting program
- **BMP:** Identify illicit connections through dry weather screening and “stream walks”
- **BMP:** Program evaluation and updates

BMP: Continue to develop the storm sewer system map

Measurable Goal: A storm drain system map has been developed in the first permit cycle. Each permit year, 25% of all outfalls are inspected by the Township Engineer. Stream walks will be conducted during the course of the permit in order to identify unmapped pipes and outfalls. These unmapped outfalls will be investigated and the source will be identified using a number of techniques outlined in the Illicit Discharge Procedure in the Operations and Maintenance Plan. The schedule for outfall inspections is as follows (refer to the Londonderry Outfall map for outfall numbers):

Inspection Cycle Year 1: (Quadrant #1) Outfalls #171 – 223 [53 Outfalls]

Inspection Cycle Year 2: (Quadrant #2) Outfalls #113 – 170 [58 Outfalls]

Inspection Cycle Year 3: (Quadrant #3) Outfalls #1 – 14 & #76 – 112 [51 Outfalls]

Inspection Cycle Year 4: (Quadrant #4) Outfalls #15 – 75 [61 Outfalls]

Any newly constructed outfalls will be added to the map at the end of the permit year and visited in the subsequent permit year.

BMP: Illicit discharge detection and elimination reporting program

Measurable Goal: The Township will continue to develop their IDD&E, utilizing call forms and training sessions. In March of the current permit year (2016), a training session will be held for each municipal staff department (office staff, public works, golf course, and codes/zoning).

The Township phone number and Environmental Department cell phone number will be published as a reminder for citizens to report illegal dumping and suspicious discharges. The phone number will be advertised in the Township newsletter, bulletin board, website, and Facebook.

BMP: Identify illicit connections through dry weather screening and “stream walks”

Measurable Goal: Londonderry Township has approximately 63 stream miles. Each permit year, 25% of streams will be walked. Streams will be walked and potential illicit connections will be located. The “stream walk” will occur in the second quarter, with the intent that leaf cover is not yet fully developed and the weather has warmed. This dry weather screening will include water sampling and testing for dry weather flows in the event that they were not previously tested and determined to be a legal connection. The purpose of this activity is to identify and eliminate illicit discharges into Township's streams.

Inspection Cycle Year 1: Iron Run Urbanized Area

Inspection Cycle Year 2: 283 Corridor Urbanized Area

Inspection Cycle Year 3: Conewago Creek Urbanized Area

Inspection Cycle Year 4: Susquehanna River Urbanized Area

All identified discharges will be marked, tested, and documented. In the event that the Township determines that any of the discharges identified are prohibited under subsection § 150.4 of the SWMO, the Township will notify the responsible person(s) to cease the discharge (§ 150.5). Upon notice provided by the Township, the discharger will have reasonable time, as determined by the Township, to cease the discharge, consistent with the degree of pollution caused by the discharge (§ 150.6).

BMP: Program evaluation and updates

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

will be compiled for the annual report documenting the follow-up action taken for each. This staff-level review will occur in May. Files will be sent to the Township Engineer in June for inclusion in the annual report, due in July.