

---

## **EAST HANOVER TOWNSHIP ILLICIT DISCHARGE AND ELIMINATION PLAN (MCM#3)**

---

### **Background**

Under the National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit, the Township is required to design a stormwater management program to be in compliance with the permit. Under the permit, the Township must satisfy specific minimum control measures (MCMs) relating to illicit discharges to the MS4. The areas covered under the Township's jurisdiction for the purposes of this plan include anything within the Township right-of-way and all Township-owned facilities.

#### **1) Identification of Priority Areas**

In Permit Year 1, the outfalls within the Township will be compiled into four priority areas to be sampled within the four following years. The outfalls will be screened once during the permit term unless an illicit flow was detected or past problems are known, in which case the outfall will be screened annually during the permit term.

#### **2) Outfall Screening Procedures**

Herbert, Rowland & Grubic Inc. (HRG) staff screen all Township-owned outfalls in order of priority during Permit Years 1 through 4 of the NPDES MS4 Permit. During Permit Year 5, any newly installed outfalls are screened as well as any outfalls which have shown illicit flow or problems during past inspections. Outfalls are screened at least 72 hours after the most recent measureable rain event to observe dry weather conditions. During the screening, staff photograph the outfall and determine if dry weather flow is present. A simple and easy-to-read Outfall Inspection Report has been created by HRG which contains all of the information on the Field Sheet provided in the permit package. This report will provide information on all of the outfalls inspected during the permit year. In addition to the HRG-created report, if dry weather flow is found at any outfall, staff will fill out the Outfall Reconnaissance Inventory/Sample Collection Field Sheet that was provided with the authorized NPDES MS4 Permit package. All of this information is stored at HRG.

If flow is observed during the inspection, it will be traced up through the system to its origin. If the origin of the flow is unknown or is unable to be found, staff will interview residents of the area and Township staff to determine if the discharge is an illicit connection or discharge. If observation of the flow reveals any turbidity, floating or submerged solids, odor, or adverse effects to plant or animal life in proximity to the

outfall, samples of the discharge will be collected for field and/or lab testing. Field testing parameters will include: pH, conductivity, chlorine, coliform bacteria, ammonia-nitrogen, nitrate/nitrite, copper, iron, and lead.

Should the testing reveal contaminants, the flow will be considered to be illicit and steps will be taken to eliminate the discharge.

### **3) Eliminating Illicit Discharges**

The first step in eliminating illicit discharges focuses on public education, which is covered in MCMs #1 and #2. Through the education of the public, the goal is that more people within the Township will become aware of the hazards that illicit discharges have on the environment around us every day and how one person's actions can impact everyone within the community. Through the Township's Public Involvement and Participation Program, a tracking system will be implemented to encourage public involvement, solicit public input, and encourage the public to contact the Township if they observe any actions or evidence which would indicate illicit discharges into the storm sewer system. Should any actions or evidence of illicit discharges be reported by the public or observed by municipal employees, the Township will contact the DEP for recommendations on how best to proceed.

If during outfall inspections or inlet/outfall cleaning or repair, municipal staff discovers an illicit discharge, the discharge will be followed to its source and the owner of the property or the person responsible for the discharge will be interviewed and educated on how to eliminate the specific discharge. The responsible party will be sent a letter on official Township letterhead which will state the nature of the discharge, state the actions to be performed to eliminate the discharge, provide a deadline for compliance, and establish penalties per the ordinance for non-compliance.

If an observed discharge is difficult to track to its source, dye testing may be performed by the East Hanover Public Works Department. Any camera testing of the storm system will be completed by a certified company contracted through the Township.

Any correspondence and information related to the detection and elimination of illicit discharges will be included within the NPDES MS4 Annual Report, of which a copy will be retained by the Township for use by municipal employees, officials, and the public.

#### **4) Non-outfall Illicit Discharges**

The Township recognizes that illicit discharges can occur at any location in the MS4 and may not always be identified at the outfall. For those instances (motor vehicle accidents, motor vehicle leaks, construction site discharges, grass in the gutter, excessive pet waste on private property, etc.), Township staff are trained to identify these illicit discharges and ensure that they are eliminated/controlled and documented using the proper form.

If an illicit discharge is known to be or suspected of being greater than 50 gallons, is otherwise uncontrollable or poses a potential immediate hazard to human health and safety, 911 will be called immediately.

#### **5) Program Evaluation and Assessment**

Each year the Illicit Discharge Detection and Elimination Plan will be evaluated and updated. Newly constructed outfalls will be placed on the MS4 Outfall Map and will be investigated during the next round of outfall inspections. A report will be generated addressing citizen complaints and/or reports of illicit discharges and follow up actions taken for each. Any potential changes in the IDD&E Plan noted during the past permit year will be reviewed and the plan will be updated accordingly.

The plan will be flexible enough to evolve with the ever-changing technologies, program obstacles and complications that may come along. This is why an annual review of the program will be completed.