

Illicit Discharge Detection & Elimination Program  
Manual  
(IDD&E)



Pennsylvania Turnpike

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## A. BASIS FOR THE PROGRAM

The Pennsylvania Turnpike Commission (PTC) is undertaking the Illicit Discharge Detection and Elimination (IDD&E Program) for the Municipal Separate Storm Sewer System (MS4) as part of coverage under its National Pollutant Discharge Elimination System (NPDES) permit. The PTC MS4 is the portion of the PTC property within and receiving runoff from the Urbanized Area as defined by the 2010 U.S. Census. The MS4 system consists of a series of stormwater management facilities, inlets, pipes, swales, and outfalls; collecting and conveying stormwater from impervious areas and discharging them into various locations.

The Pennsylvania Turnpike is comprised 556 miles of toll roads:

- East-West Mainline (I-76, I-276)
- Beaver Valley Expressway (I-376)
- Southern Beltway (Turnpike 576)
- Mon/Fayette Expressway (Turnpike 43)
- Greensburg Bypass (a.k.a. Amos K. Hutchinson Turnpike 66)
- Northeast Extension (I-476)

The PTC also includes a number of properties and facilities that support the transit corridor, including service plazas, maintenance facilities, stand-alone storage facilities, communication tower properties, administration and operations centers as well as surplus properties.

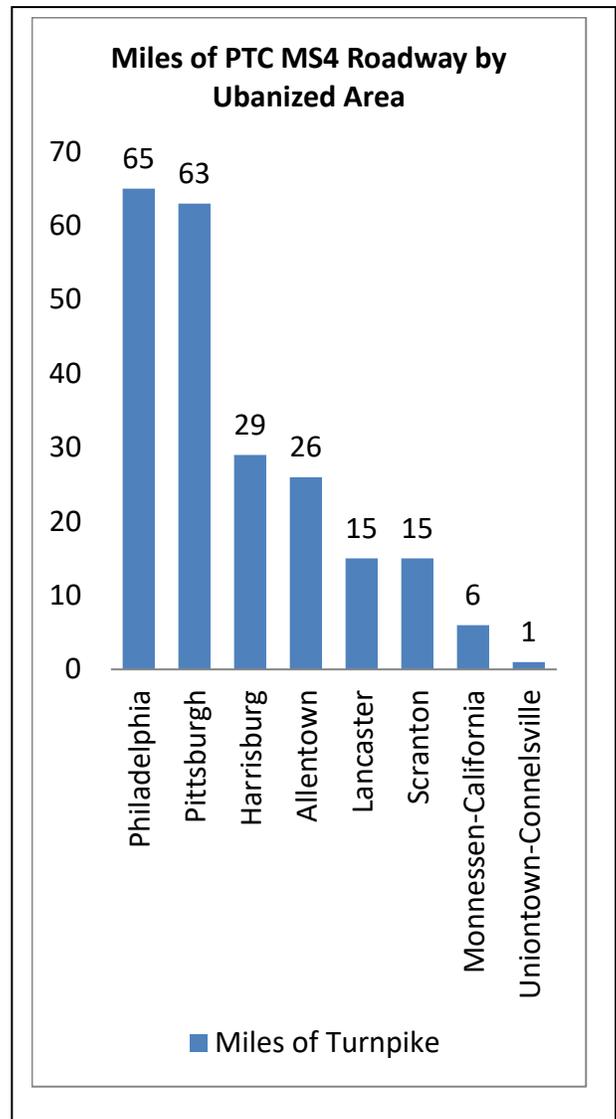
The Turnpike and its facilities span the east-west axis of the Commonwealth, with north-south extensions from Philadelphia and Pittsburgh. The PTC MS4 is defined by the eight urbanized areas that the Turnpike traverses that are listed below.

- Philadelphia (PA-NJ-DE-MD)
- Pittsburgh
- Harrisburg
- Allentown (PA-NJ)
- Lancaster
- Scranton
- Monessen-California
- Uniontown-Connellsville

Approximately 40% of the Turnpike (220 miles) is in the PTC MS4. The PTC MS4 is subject to the IDD&E procedures outlined in this manual.

The various components include impervious surfaces that produce increased runoff. In turn the runoff is collected and conveyed through the MS4 and ultimately makes its way to surface waterways. It is protection and enhancement of the quality of that water that is the focus of this program; The IDD&E program is the strategies to find, correct, and prevent contaminated stormwater discharges to the waters of the U.S./Commonwealth from the MS4.

The PTC regulated storm sewer system area is currently defined by the U.S. Census Bureau’s 2010 Urbanized Area. This Program applies to monitoring discharges within the current MS4 area to comply with Pennsylvania’s Chapter 92a *National Pollutant Discharge Elimination System (NPDES) Permitting, Monitoring and Compliance*, specifically with regard to compliance with stormwater discharges (25 Pa. Code § 92a.32)



and *U.S. Code of Federal Regulations* (CFR). Title 40: Protection of Environment. Minimum Control Measure (MCM) #3 (40 CFR§ 122.34(b)(3)) explains the federal requirement for MS4 permit holders to identify and eradicate sources of stormwater-borne pollutants to U.S. surface waters as part of the permittee's Stormwater Management (SWM) Program.

Essentially illicit discharges are any flows from the stormwater system that are non-stormwater. However, there are a few exceptions. The PTC MS4 Permit identifies the following categories of non-stormwater discharges that do not require elimination unless the PTC designates them as significant contributors of pollutants. The categories include:

- Discharges or flows from firefighting activities.
- Discharges from potable water sources including water line flushing and fire hydrant flushing if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).
- Non-contaminated Irrigation water.
- Water from lawn maintenance.
- Flows from riparian habitats and wetlands.
- Diverted stream flows.
- Springs
- Non-contaminated groundwater
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used.
- Water from foundation and footing drains.
- Water from crawl space pumps.
- Air conditioning condensation.
- Individual residential car washing where cleaning agents are not used.
- Routine external building wash down which does not use detergents or other compounds.

### Required Program Components:

Best Management Practice #1 under Minimum Control Measure #3 requires the following be accomplished by the PTC Stormwater Management Program:

*BMP #1: The PTC shall continue to implement its written program for the detection, elimination, and prevention of illicit discharges into the PTC's regulated small MS4 as documented in the PTC's Illicit Discharge Detection and Elimination (IDD&E) Program Manual. The Manual shall, at all times during the term of the permit, contain the following, at a minimum:*

- *Procedures for identifying priority areas. These are areas with a higher likelihood of illicit discharges, illicit connections or illegal dumping. Priority areas may include areas with older infrastructure, a concentration of high-risk activities, or past history of water pollution problems.*
- *Procedures for screening at outfalls and observation points in priority areas.*
- *Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a PTC's regulated small MS4 outfall or observation point.*
- *Procedures for eliminating an illicit discharge.*
- *Procedures for assessing 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 within the regulated MS4.*
- *Procedures for program documentation, evaluation and assessment.*
- *Procedures for addressing information or complaints received from the public.*

The IDD&E program shall be implemented, evaluated each year, and revised as necessary.

### **PTC Authority to Prohibit Illicit connection and Dumping into the MS4**

The PTC *Maintenance Manual* addresses issues related to runoff including critical IDD&E factors. The statutes and policy provide the PTC with the enforcement capability to eliminate illicit discharges from the PTC's storm sewer system. Specifically, Section 7.4 Drainage Discharge prohibits specified discharges of sewage or drainage within the Turnpike Property. See below:

*Section 420(e) of the State Highway Law of 1945 and, as amended, March 7, 1982 and Pennsylvania Code title 67, Chapter 441 supports the Commission's position in this matter.*

*Section 420 (e) makes it a summary offense for any person to:*

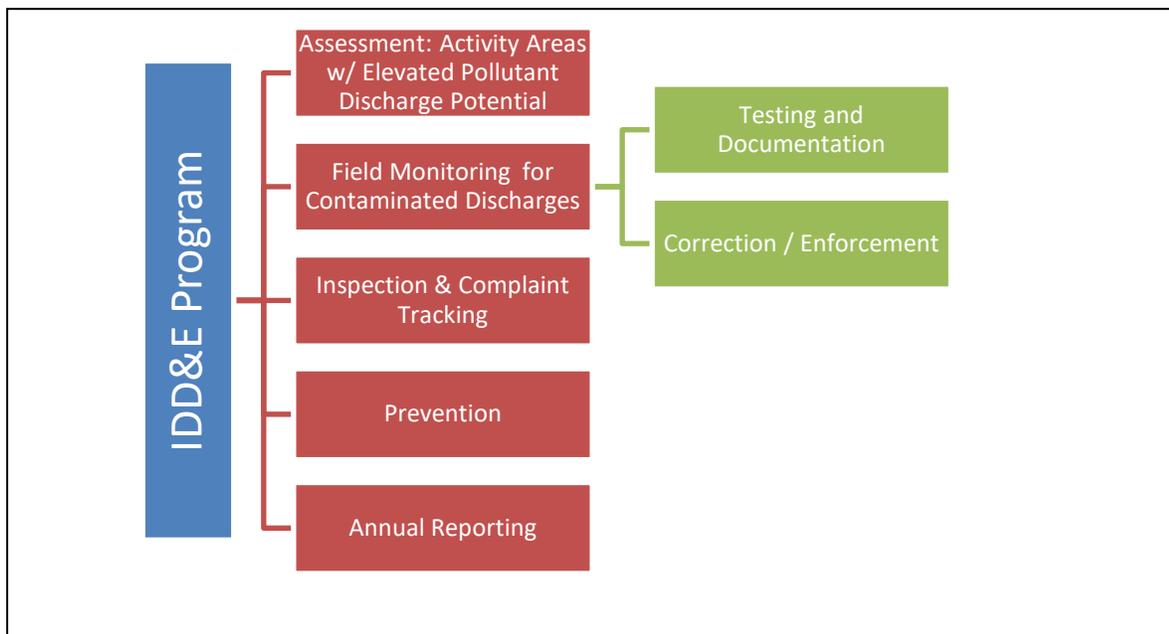
- (a) Violate any rule or regulation promulgated under authority of Section 420.*
- (b) Willfully destroy, injure or damage any highway by any method or device.*

*It is unlawful for any person or entity to discharge sewage or drainage on or within Turnpike property. Any such discharge should be considered an unlawful trespass and should be reported immediately to the Engineering and Legal departments. In the event the discharge presents an imminent danger to the health and safety of traveling public, actions should be taken immediately to block or remove the drainage and protect the traveling public. The Engineering and Legal departments should be promptly advised of any such actions to be taken by maintenance personnel.*

## **B. PROGRAM FUNDAMENTALS**

Although the PTC is a non-traditional (non-municipal) MS4, the PTC's IDD&E Program contains the same fundamental components practiced by MS4's nationwide. The primary elements of the Program were originally outlined by the Center for Watershed Protection (CWP) in its publication, *Illicit Discharge Detection and Elimination – A Guidance Manual for Program Development and Technical Assessments (IDD&E Guidance)* and are diagrammed below.

([https://www3.epa.gov/npdes/pubs/idde\\_manualwithappendices.pdf](https://www3.epa.gov/npdes/pubs/idde_manualwithappendices.pdf))

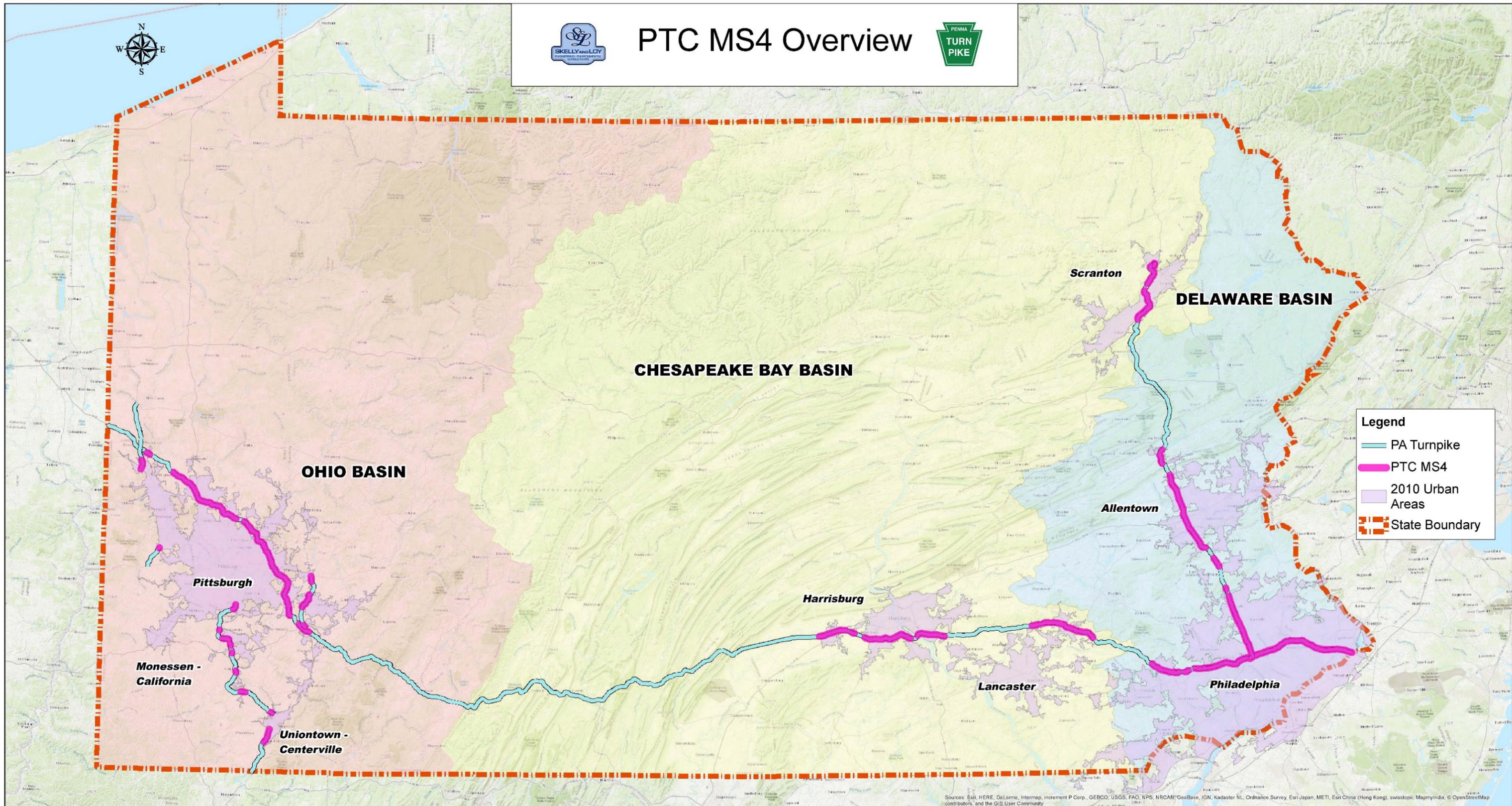


The PTC IDD&E Program utilizes the CWP *IDD&E Guidance* to the extent practical because it is featured by the U.S. Environmental Protection Agency (EPA) (and provided on the PADEP MCM #3 webpage as the IDD&E Manual) as a primary resource for developing an IDD&E Program and is an agency-accepted methodology for recognizing and eliminating potential stormwater-borne pollution. However, since the *IDD&E Guidance* was specifically tailored for a municipal audience, some of the information is not directly transferrable to a transportation network. The Turnpike is a linear land use with a singular purpose, facilitation of automotive travel within its system. The Turnpike crosses dozens of municipalities and hundreds of watercourses. The PTC is not a government and has no ability to legislate. While the PTC provides user services and roadway maintenance, it is limited to the Turnpike corridor and infrastructure such as sewer, water and emergency services are usually coordinated with non-Turnpike entities such as adjacent municipalities or state agencies.

The map on the following page 6 shows the considerable land area included in PTC’s regulated MS4 area. Due to the size and expanse of the regulated area, the IDD&E Program combines a field monitoring program supplemented by Turnpike motorists’ observations of suspicious-looking fluids entering the storm sewer system and waterways.



# PTC MS4 Overview



**Legend**

- PA Turnpike
- PTC MS4
- 2010 Urban Areas
- State Boundary

Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

## C. PROCEDURES FOR IDENTIFYING PRIORITY AREAS

An Illicit Discharge Potential (IDP) desktop assessment helps target areas with high potential for illicit discharges and aids in planning the field monitoring program. These are referred to as IDP Priority Areas. The goal of the Desktop Assessment is to identify areas within the PTC MS4 with the strongest potential to release illicit discharges. The assessment also takes into account urban sites beyond PTC-owned property with the high potential to have illicit discharges to the PTC MS4.

### Factors For Elevated IDP

The PTC referenced the Center for Watershed Protection's *IDD&E Guidance, which discusses* discharge screening factors that can be indicators of IDP during the screening process. In determining the Priority Areas for illicit discharge detection, the PTC uses the following factors:

- Frequency of past discharge complaints, hotline reports, and spill responses per sewer shed.
- Outfalls where collected samples of dry weather water exceed pre-determined indicators two or more times in a single permit period.
- Facilities that store, manage, and utilize potentially polluting materials, otherwise known as Common Generating Sites.
  - PTC Maintenance Yards
  - PTC Stand-alone Storage Facilities
  - PTC Service Plazas
  - Adjacent Dense Residential, Commercial or Industrial Land Use
  - Adjacent Expansive Parking
  - Adjacent Recyclers and Scrap Yards
  - Adjacent Nurseries and Garden Centers
- Facilities that possess Industrial NPDES Stormwater Permits.
- Adjacent municipal land uses with potential to convey stormwater flows to the PTC MS4:
  - Dense Industrialized Uses
  - Dense Commercialized Uses
  - Dense Urbanized Uses

### **Priority Areas**

The PTC maintains a GIS mapping system for further reference of the MS4 boundaries, urbanized areas, and the storm sewer collection system. The IDP Priority Areas will be screened at least once during the MS4 permit cycle for visible pollutants and dry weather flows and are part of a two-group rotation described in more detail in the following section.

## D. PROCEDURES FOR SCREENING OUTFALLS IN PRIORITY AREAS

### **Overview**

All stormwater outfalls regulated by the PTC's MS4 NPDES permit must be inspected at least once during the five-year permit term. An outfall located in an area that is dangerous or infeasible to access via the PTC right-of-way will be screened at the closest identified observation point within the common drainage conveyance of the outfall. IDD&E screening for an outfall located outside of the PTC property falls under the responsibility of the local Municipal MS4 permit holder. Additionally, in compliance with PTC's MS4 permit conditions,



mapping showing the location of observation points associated with these Municipal outfalls will be provided to the respective municipality. PTC will not be performing any IDD&E screening at observation points where this mapping has been provided.

The outfall numbers correspond to PTC’s storm sewer system maps, which are maintained in the PTC GIS database and are subject to periodic updates as necessary. Outfalls within IDP Priority Areas are identified as such within the database.

The numbering code has five digits. The first digit refers to the major drainage basin in which the outfall is located. The next number refers to the outfall’s Urbanized Area (UA). The final three digits is the outfall identification (ID) number. (See PTC Outfall Numbering Code Table, below.)

*OUTFALL NUMBERING CODE*

DIGIT 1	MAJOR DRAINAGE BASIN	DIGIT 2	URBANIZED AREA	DIGITS 3 THROUGH 5 (SEQUENTIAL OUTFALL ID)
1	Ohio River Basin	1	Pittsburgh	001 to 999
		2	Uniontown-Connellsville	
		3	California-Monessen	
2	Chesapeake Bay Basin	1	Harrisburg	
		2	Lancaster	
		3	Wilkes Barre-Scranton	
3	Delaware River Basin	1	Philadelphia	
		2	Allentown	

***Outfall Screening Prioritization***

As of March 20, 2018, PTC has 887 regulated outfalls. The PTC intends to conduct prioritized outfall screenings in multiple Major Drainage Basins per year, broadening the geographic reach of the IDD&E Program rather than concentrating it in a singular Basin. Outfall screenings will be conducted in a two-group method during the permit period. The outfalls screened as part of Group 1 will consist of the IDP Priority Area outfalls and non-IDP Priority Area outfalls to equal approximately half of the total outfalls within the PTC MS4. Group 2 will consist of the balance of the regulated outfalls. Each group will be screened at least once during the 5-year permit period. It should be noted that cross-drainage culverts carrying blue-line waterways under PTC right-of-way will not be monitored as part of this program since they are streams and not outfalls.

***Outfall Field Screening (OFS) Protocol***

Outfall Screening for the PTC will be performed by contractual personnel. The PA DEP MS4 Outfall Field Screening (OFS) Report (3800-FM-BCW0521), see Appendix A, will be used to record findings. This reporting form standardizes the PTC’s field monitoring and reporting between seasons and from year to year for efficient recordkeeping. OFSs corresponding to outfalls scheduled for the current field screening season will be pre-populated with available data (e.g. subwatershed, outfall ID, latitude/longitude, land use, etc.), and accompanied by tailored maps or mobile GIS applications to guide personnel in the field.

At the outfall location, photo-documentation will take place and data collected as prompted by the OFS regardless of the presence or absence of flows. For flowing outfalls, the Dry Weather Flow Evaluation of the OFS will be completed based on observations and preliminary screening, as necessary.

A Guide to Indicators and Monitoring Methods, downloaded from PA DEP's MS4 Resources webpage is provided in Appendix B. (The Guidance was excerpted by PA DEP from a publication entitled *Designing Your Monitoring Program-A Technical Handbook for Community-based Monitoring in Pennsylvania.*) PTC will contract consultants trained to conduct preliminary screening to determine if discharges are present, are illicit in nature, and conduct field parameter testing for determining if follow-up investigative measures are necessary to eliminate an illicit discharge.

### ***Planning and Testing***

For dry weather field screenings, the goal is to observe outfalls during dry conditions (48 consecutive hours of less than 0.1" of rainfall). It will be the responsibility of the field team to monitor weather reports and plan the field work accordingly.

Whether or not illicit discharges are detected from dry-weather field screenings, the MS4 Outfall Screening Report (PADEP Form 3800-FM-BCW0521) provided in Appendix A, or PTC equivalent form should be completed for each observed outfall. The following list identifies the critical data fields for reporting:

- Outfall identification number
- Date and Time of Screening
- Individual(s) performing the screening
- Approximate Date of Last Rain
- Land Use in Contributing Drainage Area
- Outfall Description (Type, Material, Shape, Dimensions, Submerged)
- Dry Weather Flow Presence
- Description of Flow Rate
- Dry Weather Flow Evaluation
- Field/Laboratory Analysis (Field Screening of pH, Temperature, Specific Conductance, Dissolved Oxygen)

If a discharge is observed from any outfall during dry weather screenings, the discharge shall be inspected for color, odor, floating solids, scum, sheen, substances that result in observed deposits in the surface waters. In addition, the discharge cannot contain substances that result in deposits in the receiving waters or produce an observable change in the color, odor, or turbidity of the receiving water. If the discharge exhibits any of the above characteristics or the field testing parameters (pH, temperature, conductivity, dissolved oxygen) are abnormal to the local system and indicate that there is a possible illicit discharge, the screening personnel will report the outfall for follow-up investigation.

Dry-weather flows without any sign of illicit discharge may be permissible. An unexhaustive list of EPA listed instances of non-illicit, permissible discharges are described previously in Section A. This in-field determination should be noted on the OFS, effectively ending the investigation.

All investigations of illicit discharges are to be thoroughly documented and centralized in the IDD&E Case Files at the PTC Office. These files are a repository for IDD&E cases triggered by scheduled outfall inspections as well as those initiated by PTC personnel or PTC Users' observations. All field work, communication documentation, and desktop analysis relating to a given case are maintained at this single location for quick reference. Copies of OFSs for outfalls containing dry-weather flows determined not to be illicit discharges in the field are also kept with the case files but are considered closed.

### **Safety Concerns**

All Consultants/Contractors performing field observations for outfalls, illicit discharges, and other related

work on PTC property must follow a Health and Safety Plan (HASP) prepared in accordance with applicable OSHA and current industry guidelines, and may be subject to PTC review. Typical safety concerns include, but are not limited to confined spaces, unstable embankments/slopes, slip/trip hazards, fall hazards, drowning, heat/cold stress, biohazards, etc. Prior to any confined space entry, the Consultant/Contractor must provide the PTC a copy of their Confined Space Program and training certifications prior to conducting any field investigations.

## E. PROCEDURES FOR IDENTIFYING THE SOURCE OF ILLICIT DISCHARGES

Where a violation constitutes an immediate danger to public health or safety, PTC personnel or first responders must act swiftly to cut off pollution to surface waterways and eliminate the source.

### ***Illicit Discharge Notifications***

If an Illicit discharge is identified at any time, including during a dry weather outfall screening meeting the criteria in the commentary below, the PTC must also take the action prescribed below to report the issue to PA DEP.

According to 25 PA Code §91.33 and §92a.41(b), the permittee shall immediately report any incident causing or threatening pollution. The following steps will be initiated by notification by the field personnel to the PTC's Traffic Engineering and Operations Center.

1. *If, because of an accident or other activity or incident a toxic substance which would endanger users downstream from the discharge or would otherwise result in pollution or create a danger of pollution or would damage property, the PTC shall immediately notify PA DEP by telephone of the location and nature of the danger. Oral notification to the department is required as soon as possible, but no later than four (4) hours after the PTC becomes aware of the incident threatening pollution.*
2. *If reasonably possible to do so, the PTC shall immediately notify downstream users of the waters of the Commonwealth to which the substance was discharged. Such notice shall include the location and nature of the danger.*
3. *The PTC shall immediately take or cause to be taken steps necessary to prevent injury to property and downstream users of the waters from pollution or a danger of pollution and, in addition, within 15 days from the incident, shall remove the residual substances contained thereon or therein from the ground and from the affected waters of the Commonwealth to the extent required by applicable law.*

In the case of any unanticipated non-compliance which may endanger health or the environment the PTC shall follow the requirements according to 40 CFR §122.41(l)(6). The following requirements will be initiated by notification by field personnel to the PTC's Traffic Engineering and Operations Center. These requirements include the following obligations:

1. *24 Hour Reporting- The PTC shall orally report any non-compliance with this MS4 permit which may endanger health or the environment within 24 hours from the time PTC becomes aware of the circumstances.*
2. *Written Report – A written submission shall also be provided within 5 days of the time the PTC becomes aware of any non-compliance which may endanger the health or the environment. The written submission shall contain a description of the non-compliance and its cause; the period of non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate and prevent reoccurrence of the non-compliance.*
3. *Waiver of the Written Report – PA DEP may waive the written report on a case-by-case basis if the associated oral report has been received within 24 hours of the time the PTC becomes aware of the*

*circumstances which may endanger health or the environment. Unless such a waiver is expressly granted by PA DEP, the PTC shall submit a written report in accordance with this paragraph. (25 PA Code §92.a.3(c) and 40 CFR § 122.41(l)(6)(iii)).*

#### **Illicit Discharge Response: On PTC Property**

Discharges within the PTC's control will be traced upstream from the discharge to search for the source of the pollution. Pollutant source on PTC property will be eliminated through the combination of education and maintenance operations. The outfall will be revisited and retested, as appropriate, until the elimination of the pollution has been verified. Once the illicit discharge elimination has been confirmed, inspection of the outfall will return to the normal schedule.

#### **Illicit Discharge Response: Off PTC Property**

Since the PTC has no legal authority beyond its property boundaries, it may not be possible to identify the source of an apparent illicit discharge (see Section D) if these flows are exhibited. Using the PTC's storm sewer system map, the inspector should identify the name of the municipality from which the discharge is emanating. Notifications to the Pennsylvania Department of Environmental Protection (PADEP) should be made in conformance with the PTC's MS4 Permit as described above in **Illicit Discharge Notifications**. Due to the origin of the illicit discharge being located off PTC property, during the initial notification to PADEP, it is necessary to coordinate with PADEP for notification to the upstream Municipality of origin. Lacking specific directive in the Permit, after the initial notifications, the PTC will issue a follow up letter to the municipality and notification to PA DEP within 30 days of the observed and unresolved discharge.

#### **Procedures for Tracking Pollution Sources**

There are several methods that may be employed to locate the source of an illicit discharge. The PTC will predominately rely on visual/sensory inspections but may use video inspection.

##### Visual/Sensory Inspections

Once an illicit discharge has been verified, the inspection team will refer to the stormwater network map to familiarize themselves with the contributing system and identify if there is a connection to an upstream MS4 (referred to as an Observation Point). Generally, any connection to an upstream MS4 will be inspected first to determine if the source of the discharge is within the jurisdiction of the PTC or if it is emanating from the upstream municipality. This inspection will rely on observations that the inspectors can make using sight and smell to observe color, odor, floating solids, scum, sheen, and substances that result in observed deposits in the surface waters indicating the presence of materials other than stormwater within the stormwater network that discharges to the polluted outfall. If the source is confirmed to be emanating from the upstream municipality, the PTC will notify the municipality and PA DEP as stated above in the **Non-Emergency Illicit Discharge Response: Off PTC Property** section.

If there is no evidence of the pollutant at an upstream Observation Point, the inspection team will systematically visually examine the flow path of the stormwater runoff beginning at the compromised outfall and working upstream along the conveyance system until the source of the illicit discharge is located. Observations for stormwater enclosed in pipes will be made at inlets and manholes. Only properly certified personnel for confined spaces will be permitted to enter stormwater pipes, inlets and manholes.

##### Video Inspection

While expensive and time consuming, remotely operated mobile video cameras can be used to examine storm sewer lines to observe possible illegal connections into the storm sewer system. The method allows definitive identification of unauthorized connection and video imaging provides reliable documentation.

## F. PROCEDURE FOR ELIMINATING AN ILLICIT DISCHARGE

Illicit discharges within the Turnpike stormwater system is a straightforward endeavor. The PTC MS4 is owned and operated by the PTC. The PTC can therefore take direct corrective measures or require any utility or vendor with facilities located on PTC land to take corrective measures as required by their respective agreements. PTC utility and vendor agreements include required compliance with federal, state and local regulations and laws.

Any illicit discharge emanating from outside the PTC property is under municipal jurisdiction and is their responsibility. As stated in **Section E. Procedures for Identifying the Source of Illicit Discharges**, the PTC will notify the upstream municipality and PA DEP of the illicit discharge so that corrective action can be pursued by the municipality and/or PA DEP.

## G. PROCEDURES FOR ASSESSING POTENTIAL ILLICIT DISCHARGE BY THE INTERACTION OF SEWAGE DISPOSAL SYSTEMS

Interactions between sewage disposal systems and stormwater systems located on PTC land are limited. There are five types of facilities within the PTC where such interaction is possible. The uses are listed below.

- Service Plazas
- Maintenance Facilities
- Toll Plazas
- Administration Buildings
- Tunnels

Once evidence of sanitary sewage is discovered at an outfall, the same discovery procedure described in **Procedures for Tracking Pollution Sources** will be followed. The First step will be to determine if the source is within PTC property or emanating from an upstream municipality. This will be accomplished through the inspection of observation point(s) where the upstream municipality's stormwater enters the PTC MS4.

The PTC will then examine potential sources on PTC property. To aid in identification of the source the sanitary sewer interaction the PTC might rely on Dye or Smoke Testing or by use of a Video Inspection (See Section E).

### Dye Testing

Dye testing requires non-toxic dyes to be flushed down facility toilets and sinks. Pre-positioned observers watch for the passage of the dye at sanitary and storm manholes. The presence of the dye in the stormwater system would indicate an interconnection of the stormwater and sanitary system. The PTC is unlikely to use this method to identify connections from outside the PTC since the Commission has no jurisdiction beyond their property and cannot require private property owners to allow the injection of dye through their toilets and sinks.

### Smoke Testing

Smoke testing is a relatively simple process that consists of blowing smoke mixed with large volumes of air into the sanitary sewer line usually induced through the manhole. The smoke travels the path of least resistance and quickly shows up at sites that allow surface water inflow. Where the PTC is served by public sewer, and smoke testing is selected as a means of determining infiltration and inflow, the PTC will coordinate with the local sanitary sewer provider.

Once sanitary sewer interaction is discovered it can be resolved directly by the PTC or by requiring a vendor or co-located sanitary sewer utility operator to take the required corrective actions.

#### Interaction between sewage systems located outside the PTC and the PTC MS4

Interaction of sewage systems located outside the PTC property is under municipal jurisdiction and is their responsibility. As stated in **Section E. Procedures for Identifying the Source of Illicit Discharges**, the PTC will notify the upstream municipality and PA DEP of the illicit discharge so that corrective action can be pursued by the municipality and/or PA DEP.

## **H. PROCEDURES FOR PROGRAM DOCUMENTATION, EVALUATION AND ASSESSMENT**

All reporting shall be performed based on a reporting period of July 1 to June 30. At the conclusion of each reporting year, an activity report will be produced to detail that year's work under the IDD&E Program. PTC's overarching SWM Plan has established a process for logging annual reporting into that document, which encompasses this Program. The IDD&E work will be an integral part of the MS4 Annual Status Report (3800-FM-BCW0491) and will consist of the following elements, as applicable:

1. Written Program Review
2. MS4 Mapping Updates
3. Storm Sewer Collection System Mapping Updates
4. Outfall Screening Activities (including results from any lab testing)
5. Employee & Public Outreach Activities

## **I. PROCEDURES FOR ADDRESSING INFORMATION OR COMPLAINTS RECEIVED FROM THE PUBLIC**

The PTC's *Public Education and Outreach & Public Involvement and Participation Programs* are a way for Turnpike users to become involved with the IDD&E process. Part of the PTC's public awareness campaign is using Turnpike motorists to report any unusual fluids entering or discharging from the storm sewer system, especially during dry weather conditions.

The role of PTC staff is to investigate and pursue remedies for illicit discharges reported by Turnpike users or observed by PTC personnel. Public comments are recorded and tracked at the PTC Traffic Engineering and Operations Center. A prompt visual inspection of the site will take place, resulting in an assessment of the perceived illicit discharge through photo-documentation and tracking it back to a potential source or to the PTC's upstream MS4 boundary. If pollutants are suspected, the subsequent process will mirror that which is used in the PTC regularly scheduled field monitoring regimen.

The PTC receives complaints from the public via the incident reporting hotline. Calls are fielded by the Traffic Engineering and Operations (TE&O) Center, where it is determined if the complaint requires an emergency response or is a non-emergency issue. Emergency responses are managed by TE&O staff who notifies emergency responders, and federal, state, and local offices.

Non-emergency issues are forwarded to the PTC Public Relations office that assesses the nature of the issue and connects the caller to the appropriate PTC department for response.



Appendix A  
PA DEP MS4 Outfall Field Screening Report (OFS)  
[PADEP Form 3800-FM-BCW0521]



**Appendix B**  
**Guide to Indicators and Monitoring Methods**  
[Adapted From: Illicit Discharge Detection and Elimination – A Guidance  
Manual for Program Development and Technical Assessments]