

Illicit Discharge Detection and Elimination (IDDE) Plan

Town of Wilton

Permit Year 5

EPA NPDES Permit Number NHR041000

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Town of Wilton, NH

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1 IDDE Program Implementation Timeline

Table 1-1. IDDE Program Implementation Timeline

IDDE Program Requirement	Completion Date from Effective Date of Permit					
	1 Year	1.5 Years	2 Years	3 Years	7 Years	10 Years
Written IDDE Program Plan	X					
SSO Inventory	X					
Initial Outfall Ranking	X					
Written Catchment Investigation Procedure		X				
Phase I Mapping			X			
Phase II Mapping						X
IDDE Regulatory Mechanism or By-law (if not already in place)				X		
Dry Weather Outfall Screening				X		
Follow-up Ranking of Outfalls and Interconnections				X		
Catchment Investigations – Problem Outfalls					X	
Catchment Investigations – all Problem, High and Low Priority Outfalls						X

Table 1-2. MCM #3 Annual Requirements

Requirement	Permit Page Number	Permit Section	Status
Update sanitary sewer overflows (SSO) Inventory	31	2.3.4.4	Page 4 of the IDDE template
Update outfall and interconnection inventory and ranking	34	2.3.4.7.a	Outfall ranking template
Retest any removed or fixed illicit discharges	43	2.3.4.8.e.ii	Municipal Specific
Define and describe indicators of IDDE program progress in annual report	43	2.3.4.9	Municipal Specific
Provide IDDE training to involved employees	44	2.3.4.11	See the IDDE Training Videos section on the MCM #3 webpage

Table 1-3. MCM #3 Year 5 Requirements

Requirement	Permit Page Number	Permit Section	Status
Complete Phase I mapping: interconnections, municipally owned stormwater treatment structures and open channel conveyances.	32	2.3.4.5.a	Municipal Specific
All outfalls/interconnections (excluding Problem and excluded Outfalls) shall be inspected for the presence of dry weather flow within three (3) years of permit effective date. The permittee	36	2.3.4.7.b	Year 6 requirement but we are starting it now to be proactive

shall screen all High and Low Priority Outfalls in accordance with their initial ranking			
Begin addressing Problem Catchments. Dry weather screening is not required. Proceed directly to source investigations.	39	2.3.4.8.a	Begin no later than Year 5
Written catchment investigation procedures	39	2.3.4.8.b	Written catchment investigation procedures template
Document System Vulnerability Factors (SVF) for every catchment investigated	40-41	2.3.4.8.c	Year 10 requirement but we are starting it now to be proactive
Start wet weather sampling	42-43	2.3.4.8.c.ii.2	Year 10 requirement but we are starting it now to be proactive
Create an ordinance or other regulatory mechanism that requires the use of sediment and erosion control practices at construction sites.	45	2.3.5.3.a	Construction Site Stormwater Runoff Control Document
Create written procedures for site plan review, site inspections and enforcement of sediment and erosion control measures by the permittee	45	2.3.5.3.b	Construction Site Stormwater Runoff Control Document

2 Authority and Statement of IDDE Responsibilities

2.1 Legal Authority

The Town of Wilton has adopted an Illicit Discharge Detection and Elimination (IDDE) Ordinance with adequate legal authority to:

- Prohibit illicit discharges
- Investigate suspected illicit discharges
- Eliminate illicit discharges, including discharges from properties not owned by or controlled by the MS4 that discharge into the MS4 system
- Implement appropriate enforcement procedures and actions.

The Town of Wilton will review its current Illicit Discharge Detection and Elimination (IDDE) Ordinance and related land use regulations and policies for consistency with the 2017 MS4 Permit.

2.2 Statement of Responsibilities

The stormwater manager is the lead municipal agent responsible for implementing the IDDE program pursuant to the provisions of the Illicit Discharge Detection and Elimination (IDDE) Ordinance, or delegating the responsibility of such implementation to a similarly qualified agent or department. Other agencies or departments with responsibility for aspects of the program include:

- **Department of Public Works – Mike Tatro: Public Infrastructure Maintenance Manager**
- **Highway Department – Mike Tatro: Facility and Roads Public Roads Infrastructure Manager**
- **Sewer Department – Sewer Commisison: Maintains sewer infrastructure and planning**
- **Building Inspector – David Descheneaux: Code Compliance**
- **Licensed Plumbing Inspector – David Descheneaux: Code Compliance**
- **Health Department - David Descheneaux: Code Compliance**
- **Conservation Agent - Conservation Commission: Conservation Monitoring**

- **Planning Board Chairperson – Stormwater regulation enactment and design**
- **Board of Selectmen – Stormwater Policy execution design**
- **Town Administrator – Nick Germain: Stormwater Manger**

3 Stormwater System Mapping

A link of the existing storm system map is provided in [Appendix B](#).

The MS4 Permit requires the storm system map to be updated in two phases as outlined below. The stormwater department or delegate thereof is responsible for updating the stormwater system mapping pursuant to the 2017 MS4 Permit. The Town of Wilton will report on the progress towards completion of the storm system map in each annual report. Updates to the stormwater mapping will be included in **Appendix B**.

3.1 Phase I Mapping

Phase I mapping must be completed within two (2) years of the effective date of the permit (July 1, 2020) and include the information per Part 2.3.4.5.a of the MS4 Permit.

3.2 Phase II Mapping

Phase II mapping must be completed within ten (10) years of the effective date of the permit (July 1, 2028) and include the information per Part 2.3.4.5.b of the MS4 Permit.

4 Sanitary Sewer Overflows (SSOs)

Town of Wilton has no Sanitary Sewer Overflows (SSOs).

Discharges of wastewater from any point sources, including sanitary sewer overflows (SSO's) shall be reported in accordance with Part II, Section D.1.e. of the General Requirements of the Publicly Owned Treatment Works General Permit.

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5 Assessment and Priority Ranking of Outfalls

The MS4 Permit requires an assessment and priority ranking of outfalls in terms of their potential to have illicit discharges related public health significance. The ranking helps determine the priority order for performing IDDE investigations and meeting permit milestones.

5.1 Outfall Catchment Delineations

The catchments for each of the MS4 outfalls will be delineated to define contributing areas for investigation of potential sources of illicit discharges.

5.2 Outfall and Interconnection Inventory and Initial Ranking

The stormwater manager or a qualified delegate thereof will complete an initial outfall and interconnection inventory and priority ranking to assess illicit discharge potential based on existing information. The initial inventory and ranking will be completed within one (1) year from the effective date of the permit. An updated inventory and ranking will be provided in each annual report thereafter. The inventory will be updated annually to include data collected in connection with dry weather screening and other relevant inspections.

Outfalls and interconnections will be classified into one of the following categories:

1. Excluded outfalls:

- Outfalls/interconnections that do not discharge to an impaired waterbody or are not listed in Part II Summary of Receiving Waters in the NOI.
- Outfalls/interconnections with no potential for illicit discharges including roadway drainage in undeveloped areas with no dwellings and no sanitary sewers; drainage for athletic fields, parks or undeveloped green space and associated parking without services; cross-country drainage alignments (that neither cross nor are in proximity to sanitary sewer alignments) through undeveloped land.

2. Problem Outfalls: Outfalls/interconnections with known or suspected contributions of illicit discharges based on existing information shall be designated as Problem Outfalls. This shall include any outfalls/interconnections where previous screening indicates likely sewer input. Likely sewer input indicators are any of the following:

- Olfactory or visual evidence of sewage,
- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and bacteria levels greater than the water quality criteria applicable to the receiving water, or
- Ammonia ≥ 0.5 mg/L, surfactants ≥ 0.25 mg/L, and detectable levels of chlorine.

High Priority Outfalls: Outfalls/interconnections that have not been classified as Problem Outfalls and that are:

- Discharging to an area of concern to public health due to proximity of public beaches, recreational areas, drinking water supplies or shellfish beds
- Determined by the permittee as high priority based on the characteristics listed in **Appendix C**.

3. **Low Priority Outfalls:** Outfalls/interconnections determined by the permittee as low priority based on the characteristics listed below or other available information.

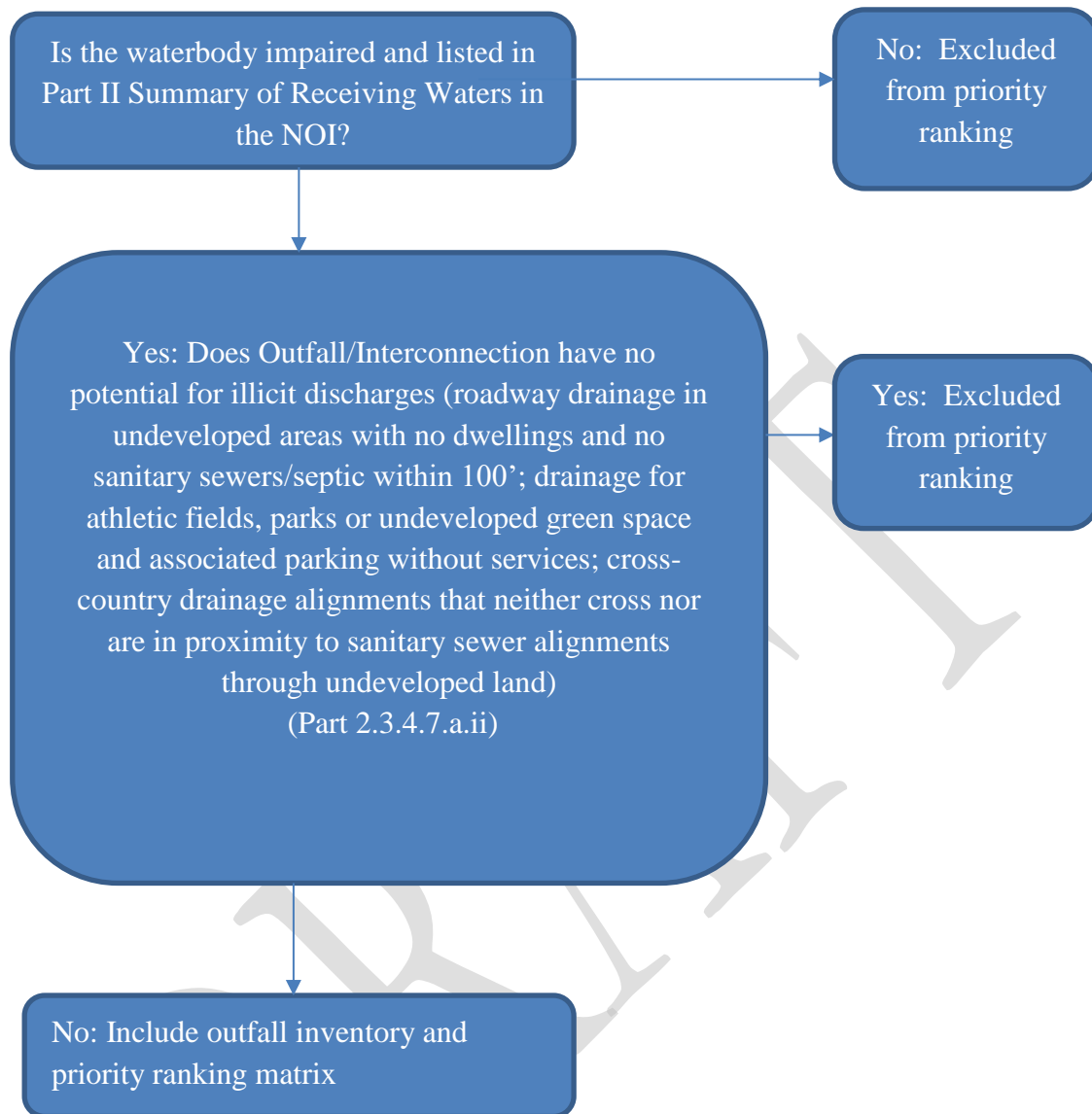
Outfalls will be ranked into the above priority categories (**except for excluded outfalls, which may be excluded from the IDDE program**) based on the following characteristics of the defined initial catchment areas, where information is available. To prioritize initial mapping and outfall assessment work the permittee is using location-specific characteristics of water body impairments to focus initial work as included in **Appendix B**. It is understood that not all currently excluded catchments will remain excluded throughout the 10 year assessment period, however for initial outfall ranking and catchment investigations this approach will target the worst areas first.

- **Previous screening results** – previous screening/sampling results indicate likely sewer input (see criteria above for Problem Outfalls).
- **Past discharge complaints and reports.**
- **Poor receiving water quality** – the following guidelines are recommended to identify waters as having a high illicit discharge potential:
 - Exceeding water quality standards for bacteria
 - Ammonia levels above 0.5 mg/l
 - Surfactants levels greater than or equal to 0.25 mg/l
- **Density of generating sites** – Generating sites are those places, including institutional, municipal, commercial, or industrial sites, with a potential to generate pollutants that could contribute to illicit discharges. Examples of these sites include, but are not limited to, car dealers; car washes; gas stations; garden centers; and industrial manufacturing areas.
- **Age of development and infrastructure** – Industrial areas greater than 40 years old and areas where the sanitary sewer system is more than 40 years old will probably have a high

illicit discharge potential. Developments 20 years or younger will probably have a low illicit discharge potential.

- **Sewer conversion** – Contributing catchment areas that were once serviced by septic systems, but have been converted to sewer connections may have a high illicit discharge potential.
- **Historic combined sewer systems** – Contributing areas that were once serviced by a combined sewer system, but have been separated may have a high illicit discharge potential.
- **Surrounding density of aging septic systems** – Septic systems thirty years or older in residential land use areas are prone to have failures and may have a high illicit discharge potential.
- **Culverted streams** – Any river or stream that is culverted for distances greater than a simple roadway crossing may have a high illicit discharge potential.
- **Water quality limited waterbodies** that receive a discharge from the MS4 or waters with approved TMDLs applicable to the permittee, where illicit discharges have the potential to contain the pollutant identified as the cause of the water quality impairment.

The following is an initial outfall prioritization flowchart, see Appendix C for an outfall inventory and priority ranking matrix:



6 Dry Weather Outfall Screening and Sampling

Dry weather flow is a common indicator of potential illicit connections. The MS4 Permit requires all outfalls/interconnections (excluding Problem and Excluded Outfalls) to be inspected for the presence of dry weather flow. The stormwater manager is responsible for delegating or conducting dry weather outfall screening, starting with High Priority outfalls, followed by Low Priority outfalls, based on the initial priority rankings described in the previous section by the end of Year 3.

Dry weather outfall Screening and Sampling shall be completed in accordance with Part 2.3.4.7.b of the MS4 Permit. Plans and procedures for such screening and sampling shall be incorporated into this plan.

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7 Catchment Investigations

Once stormwater outfalls with evidence of illicit discharges have been identified, various methods can be used to trace the source of the potential discharge within the outfall catchment area. Catchment investigation techniques include but are not limited to review of maps, historic plans, and records; manhole observation; dry and wet weather sampling; video inspection; smoke testing; and dye testing.

Catchment Investigations shall be completed in accordance with Part 2.3.4.8 of the MS4 Permit. A written catchment investigation procedure shall be developed and incorporated into this plan within 18 months of the permit effective date. Investigations of catchments associated with Problem Outfalls shall begin no later than two (2) years from the permit effective date and shall be completed within seven (7) years.

7.1 Illicit Discharge Removal

When the specific source of an illicit discharge is identified, the Town of Wilton will exercise its authority as necessary to require its removal. The annual report will include the status of IDDE investigation and removal activities including the following information for each confirmed source:

- The location of the discharge and its source(s)
- A description of the discharge
- The method of discovery
- Date of discovery
- Date of elimination, mitigation or enforcement action OR planned corrective measures and a schedule for completing the illicit discharge removal
- Estimate of the volume of flow removed.

8 Training

Annual IDDE training will be made available to employees involved in the IDDE program. This training will at a minimum include information on how to identify illicit discharges and SSOs and may also include additional training specific to the functions of particular personnel and their function within the framework of the IDDE program. Training records will be maintained in **Appendix F**. The frequency and type of training will be included in the annual report.

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9 Progress Reporting

The progress and success of the IDDE program will be evaluated on an annual basis. The evaluation will be documented in the annual report and will include the following indicators of program progress:

- Number of SSOs and illicit discharges identified and removed
- Number and percent of total outfall catchments served by the MS4 evaluated using the catchment investigation procedure
- Number of dry weather outfall inspections/screenings
- Number of wet weather outfall inspections/sampling events
- Estimate of the volume of sewage removed, as applicable
- Number of employees trained annually.

The success of the IDDE program will be measured by the IDDE activities completed within the required permit timelines.

Appendix A

Legal Authority (IDDE Bylaw or Ordinance)

This appendix shall include a copy of the IDDE Ordinance review and adopted by the Wilton Board of Selectmen in its most current form. A copy of the ordinance shall also be made available to the public on the town's website for review.

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TOWN OF WILTON

ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) ORDINANCE

Section 1. Preamble

§1.1 The Town owns and operates a Municipal Separate Storm Sewer System MS4 (as defined herein), that collects and discharges stormwater into the waters of the State of New Hampshire. The MS4 is not permitted or designed to accept, process or eliminate contaminated or unauthorized discharges, which could adversely impact local and State water resources, degrade water quality, and threaten aquatic, wildlife and human health.

§1.2 Illicit Discharges that enter into the MS4 either through direct connections (such as wastewater piping either mistakenly or deliberately connected to the storm drains) or by indirect connections (such as failing septic systems cracked sanitary pipes, spills collected by drain outlets, or by discharging any Pollutant directly into the storm basin) may result in high levels of Pollutants including heavy metals, toxins, oil and grease, solvents, nutrients, viruses, and bacteria being released directly into the receiving waters of the State of New Hampshire or the United States.

§1.3 Therefore, to protect and safeguard the public, health, safety, and welfare of the Town, its citizens, and its environs, the Select Board hereby adopts this Illicit Discharge Detection and Elimination Ordinance pursuant to its authority set forth in RSA 149-I:6, I-a.

Section 2. Purpose

§2.1 The purpose of this Ordinance is to:

- A. Protect, maintain and preserve water quality in the Town and provide for the health, safety and general welfare of the citizens of the Town by detecting and eliminating illicit stormwater discharge.
 - B. Prohibit Illicit Discharges that often contain pathogens, nutrients, surfactants and various toxic Pollutants by setting up and enforcing an Illicit Discharge and Detection Elimination Program.
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- C. Enable the Town to comply with the requirements of the Town's MS4 Permit issued by the EPA under the NPDES program and applicable regulations for stormwater discharge, as said MS4 Permit may be amended.

Section 3. Definitions

§3.1 For the purposes of this Ordinance, the following terms shall have the meanings indicated:

- A. CONNECTION: "Connection" means a pipe, drain, open channel, gutter, ditch or conveyance directly or indirectly connecting a residential, commercial, agricultural, industrial or other property or land use to the MS4 or allowing for a Discharge. By way of example, direct connections may include, but are not limited to, storm drains and underground pipes. By way of further example, indirect connections may include, but are not limited to, illicitly connected indoor drywell drains from any source, roadside gutters and other surface flows.
 - B. CONTAMINATED: "Contaminated" means containing a Pollutant.
 - C. DISCHARGE: "Discharge" means the spilling, releasing, leaking, pumping, pouring, emptying, dumping, conveying, introducing, or otherwise disposing of any solid, liquid, or gaseous matter, or any combination thereof, into the MS4 or the waters of the State of New Hampshire.
 - D. ENVIRONMENTAL PROTECTION AGENCY (EPA): "Environmental Protection Agency" or "EPA" means the Federal agency responsible for implementing the Federal Water Pollution Control Act, (3 U.S.C. § 1251 et seq.) AKA the "Clean Water Act".
 - E. ILLICIT CONNECTION: "Illicit Connection" means an unauthorized or illegal Connection, including, but not limited to: (1) any Connection allowing for the Discharge of sewage, process wastewater, wash water (aka grey water), or other Non-Stormwater Discharge to enter the MS4 or (2) Connections that have not been documented in plans, maps, or equivalent records and have not received all necessary permits and approvals from all applicable federal, state or local government agencies.
 - F. ILLICIT DISCHARGE: "Illicit Discharge" means any direct or indirect discharge of Non-Stormwater discharge other than (a) those Discharges that are expressly exempt under this Ordinance, (b) Discharges authorized or exempt pursuant to a duly issued and valid NPDES permit, and (c) discharges from firefighting activities.
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- G. MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4): “Municipal Separate Storm Sewer Systems” or “MS4” means publicly owned and operated facilities by which storm water is collected and transported , including, but not limited to, roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains, piped storm drains, pumping facility retention or detention basins, filtration ponds, reservoirs or other drainage structures that discharge to the waters of the State of New Hampshire or the United States.
- H. NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES): “National Pollutant Discharge Elimination System” or “NPDES” means the water quality program setup as part of the Clean Water Act, implemented by the EPA, to authorize the discharge of Pollutants into surface waters of the United States.
- I. NON-STORMWATER DISCHARGE: “Non-Stormwater Discharge” means Discharge to the MS4 not composed entirely of Stormwater.
- J. OWNER: “Owner” means a person with a legal or equitable interest in the property.
- K. PERSON: “Person means any individual, firm, corporation, trust, partnership, municipality, or other legal entity.
- L. POLLUTANT: “Pollutant” means any element or property of sewage, residential, agricultural, industrial or commercial waste, runoff, leachate, heated effluent or other matter, whether originating at a point or nonpoint source United States. Pollutants may include, but are not limited to: paints, varnishes, and solvents; petrochemicals, oil, and other automotive fluids; non-hazardous liquid or solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations so that same may cause or contribute to pollution; floatables; uncontrolled and/or unpermitted erosion or sedimentation resulting from excavation or construction activities; pesticides, herbicides, algicides, and fertilizers; hazardous substances and waste; identified contaminants, as defined by any applicable state or federal environmental law; sewage, fecal coliform, and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.
- M. UNCONTAMINATED: “Uncontaminated” means not containing any Pollutant.
- N. STORMWATER: “Stormwater” means any natural precipitation including rain water, seepage, storm water runoff, snowmelt, or floodwaters. “Stormwater” has the same meaning as “Storm Water.”
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- O. STORMWATER MANAGER: “Stormwater Manager” means the Select Board designee for administering, enforcing, and managing the MS4 Permit for the Town of Wilton and the provisions of this Ordinance.
- P. STORMWATER REGULATIONS. “Stormwater Regulations” means the Town of Wilton Land Use Regulations, Section H – Stormwater Management and Erosion Control Regulations as amended.
- Q. STORMWATER RUNOFF: “Stormwater Runoff” means any Stormwater that is not absorbed, evaporated or otherwise stored within the contributing drainage area.

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Section 4. Illicit Discharge and Detection Elimination (IDDE)

§ 4.1 – Prohibition of Illicit Discharges. Illicit Discharges are prohibited. It shall be a violation of this Ordinance for any Person to Illicitly Discharge or if the person is an owner or otherwise can exert control over a property or operation from which an illicit discharge is made, or permit, cause, or suffer an Illicit Discharge into the MS4 or waters of the State of New Hampshire.

§4.2 – Permitted Discharges of Non-Stormwater: The following items are not considered Illicit Discharges:

- A. Stormwater, as defined herein;
 - B. Uncontaminated Discharge from (i) Stormwater or Stormwater Runoff; (ii) ground water infiltration (as defined by 40 C.F.R. Section 35.2005(20)); (iii) pumped ground water; (iv) water from foundation and footing drains, including crawl space pumps; (v) runoff from watering lawns; and (vi) potable sources;
 - C. Uncontaminated water-line flushing;
 - D. Air conditioning condensation;
 - E. Rising groundwater;
 - F. Diverted/pumped stream flows, springs, riparian habitats, wetlands;
 - G. Individual resident car washing;
 - H. Lawn watering;
 - I. Dechlorinated and algicide free swimming pool discharges;
 - J. Discharge from municipal street sweeping;
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- K. Dye testing, provided such dye testing is performed in response to a lawful order issued by a government agency or with the prior authorization of the Stormwater Manager;
- L. Non-Stormwater Discharge permitted under an NPDES permit, waiver or waste discharge order administered under the authority of the EPA, provided that the discharge is in full compliance with the requirements of the permit, waiver or order and applicable laws and regulations; and
- M. Discharges for which advanced written approval is received from the Stormwater Manager, the Department of Environmental Services, or EPA.

§ 4.3 – Prohibition of Illicit Connections – Illicit Connections are prohibited. It shall be a violation of this Ordinance for any Person to make, construct, use, or continue the use or existence of any Connection to the MS4, or to suffer the same, without the prior authorization and approval of the Select Board. It shall further be a violation of this Ordinance for any Person to make, construct, maintain, or use an Illicit Connection, including Connections made prior to the adoption of this Ordinance, regardless of whether the Connection was permissible under law or practices applicable or prevailing at the time of Connection

§ 4.4 –Protection from Damage – No Person shall maliciously, willfully, recklessly, or negligently break damage, destroy, deface or otherwise tamper with, any pipe, drain, equipment, or other part of the MS4.

Section 5. Notification to Stormwater Manager

§ 5.1 – Notification of Spills or Other Non-Stormwater Discharges – As soon as any Person responsible for property, facility, site activity, or operation has information of: (a) any known or suspected Discharge of Pollutants or Non-Stormwater from the property, facility, site activity, or operation which constitutes or may result in an Illicit Discharges; (b) the Discharge or release of Pollutants into waters of the State or the United States from that property or facility, or resulting from that site activity; or (c) the creation of an Illicit Connection or damage to a Connection from that property or facility that may result in a Illicit Discharge or adverse impact to waters of the State or the United States, or the environment, said Person shall immediately notify the Stormwater Manager and the Health Officer, in addition to such other government agencies for which notice may be required.

Section 6. Administration and Enforcement

§ 6.1 – IDDE Responsibility for Administration. The Select Board and/or the Stormwater Manager shall administer, implement and enforce the provisions of the IDDE provisions of this Ordinance. Any powers granted or duties imposed upon the Select Board may be further delegated in writing by the Select Board to persons or entities acting in the beneficial interest of or employed by the Town of

Wilton, including, but not limited to, third-party consultants, contractors, and non-employees of the Town. Such delegation may be made on a case-by-case basis or for an indefinite period of time, as the Select Board deems appropriate.

§ 6.2 – Monitoring and Inspections. To guarantee compliance with this Ordinance or to determine the suitability and condition of any Connection, the Stormwater Manager may enter upon any property, improvement, or facility with the consent of the owner, tenant, or other authorized person, or, in the absence of such consent, pursuant to an administrative inspection warrant issued in accordance with RSA 595-B. The Stormwater Manager shall have the power to inspect any property, improvement, or facilities and Connections thereon to the MS4 and to conduct monitoring, sampling, and testing as often as may be necessary to determine compliance with this Ordinance.

§ 6.3 – IDDE Enforcement of Prohibitions

- A. Notice of Violation. Whenever the Select Board or the Stormwater Manager believe that a Person has violated this Ordinance, the Select Board or Stormwater Manager may order compliance with this Ordinance by written notice of violation to that Person. That notice of violation shall specify the nature of the violation and order the action necessary to correct it, including, without limitation:
- i. Disconnection of the Premises to the MS4;
 - ii. The removal of any Illicit Connection;
 - iii. The cessation of Illicit Discharges or other practices or operations in violation of this Ordinance;
 - iv. Eliminate the Illicit Connection or Illicit Discharge, restore any affected property, and/or repair any impacted infrastructure;
 - v. Perform any necessary analysis, studies, investigation, testing, or other steps necessary to identify the extent of any damage to the MS4, environmental contamination, or violation of this Ordinance;
 - vi. Restoration of any impacted land, soils, waters, or environs, to its condition prior to the Violation of this Ordinance, including the remediation and/or removal of any Pollutants;
 - vii. The Repair of the MS4 or any Connections;
 - viii. To the extent authorized by law, pay fines, administrative costs, remediation costs (including permitting, investigating, monitoring, testing, engineering, studying, surveying, or restoration), and attorney's fees and costs;
 - ix. Take measures to minimize the discharge of Pollutants until such time as the Illicit Connection or Illicit Discharge shall be eliminated; and/or
 - x. Such other actions as the Select Board and/or the Stormwater Manager may identify or require to address the violation of the Ordinance.
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Such notice of violation shall also specify any fines or penalties for which the Person is responsible. Such notice of violation shall identify a reasonable period of time for the initiation and completion of the required corrective action. The Select Board reserves the right to require any Person who violates this Ordinance to reimburse or pre-pay the costs for any consultants, engineers, scientists, contractors, attorneys, or other third parties necessary to determine the sufficiency of the corrective action taken in response to a violation or to evaluate the extent of or any impacts arising from the violation of the Ordinance.

B. Penalties/Fines/Injunctive Relief.

- i. Any Person who knowingly violates the provisions of this Ordinance may be fined an amount not to exceed One Thousand Dollars (\$1,000.00), for each offense. Each day on which any such violation shall continue shall be deemed a separate offense and shall be subject to a separate fine.
- ii. To the extent authorized by law, any Person who violates this Ordinance shall be responsible for any and all fines, penalties, damages, and costs, including, but not limited to attorneys' fees and costs incurred by the Town violation of federal or state environmental laws, permits, and regulations, caused by or related to that Person's violation of this Ordinance. This responsibility shall be in addition to any penalties, fines, or injunctive relief imposed under this Section.
- iii. To the extent authorized by law, any Person who violates this Ordinance shall be responsible for any and all costs, including, but not limited to attorneys' fees and costs related to engineering, studying, sampling, investigating, and remediating any violation of this Ordinance. This responsibility shall be in addition to any penalties, fines, or injunctive relief imposed under this Section.
- iv. Any Person who violates this Ordinance may be subject to orders for injunctive relief and shall be responsible for the Town's attorneys' fees and costs related thereto if injunctive relief is ordered by the Court.

C. Consent Agreements. The Select Board may enter into a written consent agreement with a party or parties found to be violating a provision of this ordinance, to address timely abatement of the violation(s) of this Ordinance, for the purpose of eliminating violations of this Ordinance, and of recovering fines, costs and for fees without court action.

D. Restoration/Remediation/Losses. The Select Board shall have the right to levy an assessment of costs upon any Person that violates this Ordinance related to the restoration or impacted property, all costs owed pursuant to §§6.3(B), the remediation of Illicit Discharges, and such other quantifiable losses and damages caused by any Illicit Discharge and/or Illicit Connection.

- E. Concurrent Jurisdiction. Nothing in this Ordinance precludes the Town's Zoning Enforcement Officer from exercising concurrent enforcement powers arising from the Town's planning, subdivision, site review, and zoning laws and regulations as they may relate to Stormwater. Nothing in this Ordinance shall be construed to alter, amend, or modify the Stormwater Regulations or any other regulation, Ordinance, or bylaw enacted by the Town. To the extent that any regulation, ordinance, or bylaw of the Town conflicts with this Ordinance, the stricter and/or more protective provision shall apply.

Section 7. Transitional Provisions.

§7.1 – Residential property owners who have an Illicit Connection due to the installation or construction of said Connection prior to the enactment of this Ordinance shall have sixty (60) days from the effective date of this Ordinance to comply with the provisions of this Ordinance, including but not limited to seeking all necessary permits and approvals necessary to lawfully establish a connection to the MS4 or remove the Connection. The deadline set forth in this Section 7.1 may be extended by the Select Board or Stormwater Manager for good cause.

Section 8. General Provisions

§ 8.1 – The standards set forth herein are promulgated pursuant to these ordinances and are minimum standards. Therefore, this ordinance does not intend, nor does it imply, that compliance by any person will ensure there will be no contamination, pollution or unauthorized discharge.

§ 8.2 – The Town of Wilton may adopt, and periodically amend, regulations, rules and/or written guidance relating to the terms, conditions definitions, enforcement, fees, procedures and administration of this Ordinance by majority vote of the Select Board in accordance with the laws of the State of New Hampshire. Failure of the Town of Wilton to issue such rules or regulations or a legal declaration of their invalidity by a court shall not act to suspend or invalidate the effect of this Ordinance. Such regulations, rules, and/or guidance may include without limitation provisions for the establishment of one or more categories of administrative review approvals for specific types or sizes of Connections or Discharges. Administrative review applications that meet all the standard requirements may be issued by one or more agents designated in writing by the Town of Wilton without the requirement of a public hearing as detailed in this Ordinance.

§8.3 This Ordinance shall not create liability on the part of the Town or any officer, agent or employee of the Town, for any damages that result from any Person's reliance on this Ordinance or any administrative decisions lawfully made hereunder.

§8.4 – The provisions of this Ordinance are hereby declared to be severable. If any provision, paragraph, sentence, or clause of this Ordinance or the application thereof to any Person, establishment or circumstances shall be held invalid, such invalidity shall not affect the other provisions or application of this Ordinance

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IDDE Ordinance Review:

https://cdnsm5-hosted.civiclive.com/UserFiles/Servers/Server_13599840/File/9.22%20Draft%20Illicit%20Discharge%20Detection%20and%20Elimination%20Ordinance.pdf

Link to IDDE Ordinance Review on Town of Wilton Website:

https://www.wiltonnh.gov/government/stormwater_management

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§ 4.4 –Protection from Damage – No Person shall maliciously, willfully, recklessly, or negligently break damage, destroy, deface or otherwise tamper with, any pipe, drain, equipment, or other part of the MS4.

Section 5. Notification to Stormwater Manager

§ 5.1 – Notification of Spills or Other Non-Stormwater Discharges – As soon as any Person responsible for property, facility, site activity, or operation has information of: (a) any known or suspected Discharge of Pollutants or Non-Stormwater from the property, facility, site activity, or operation which constitutes or may result in an Illicit Discharges; (b) the Discharge or release of Pollutants into waters of the State or the United States from that property or facility, or resulting from that site activity; or (c) the creation of an Illicit Connection or damage to a Connection from that property or facility that may result in a Illicit Discharge or adverse impact to waters of the State or the United States, or the environment, said Person shall immediately notify the Stormwater Manager and the Health Officer, in addition to such other government agencies for which notice may be required.

Section 6. Administration and Enforcement

§ 6.1 – IDDE Responsibility for Administration. The Select Board and/or the Stormwater Manager shall administer, implement and enforce the provisions of the IDDE provisions of this Ordinance. Any powers granted or duties imposed upon the Select Board may be further delegated in writing by the Select Board to persons or entities acting in the beneficial interest of or employed by the Town of Wilton, including, but not limited to, third-party consultants, contractors, and non-employees of the Town. Such delegation may be made on a case-by-case basis or for an indefinite period of time, as the Select Board deems appropriate.

§ 6.2 – Monitoring and Inspections. To guarantee compliance with this Ordinance or to determine the suitability and condition of any Connection, the Stormwater Manager may enter upon any property, improvement, or facility with the consent of the owner, tenant, or other authorized person, or, in the absence of such consent, pursuant to an administrative inspection warrant issued in accordance with RSA 595-B. The Stormwater Manager shall have the power to inspect any property, improvement, or facilities and Connections thereon to the MS4 and to conduct monitoring, sampling, and testing as often as may be necessary to determine compliance with this Ordinance.

§ 6.3 – IDDE Enforcement of Prohibitions

- A. Notice of Violation. Whenever the Select Board or the Stormwater Manager believe that a Person has violated this Ordinance, the Select Board or Stormwater Manager may order compliance with this Ordinance by written notice of violation to that Person. That notice

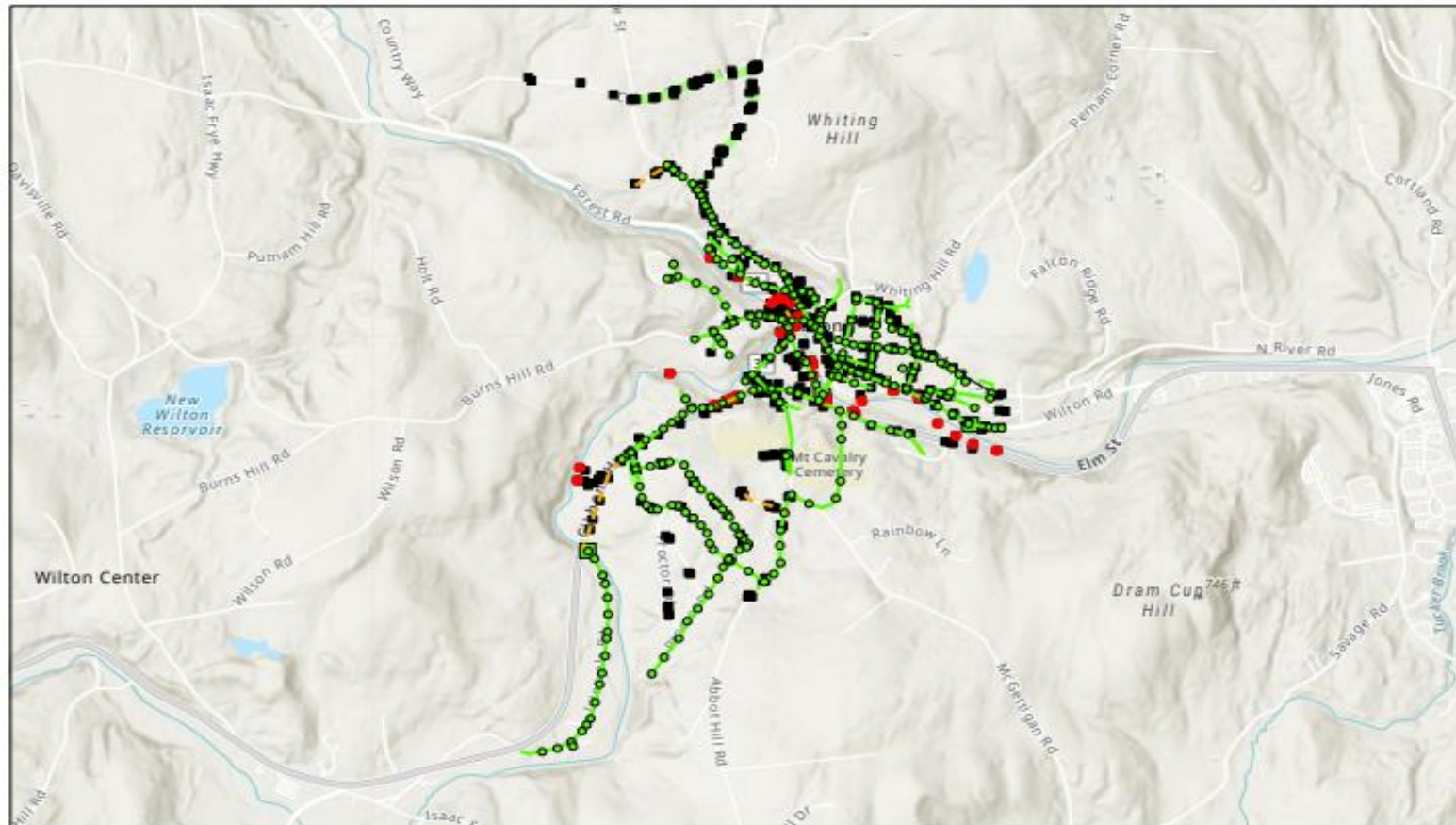
Appendix B

Storm System Mapping

This appendix shall include copies of the GIS maps generated using ArcGIS to map out the stormwater inventory for the Town of Wilton. Maps shall be labelled with a number and their date of entry into this appendix, and will include maps of outfall locations, swales and ditches, and other vertical and horizontal assets relevant to the town's storm sewer system.

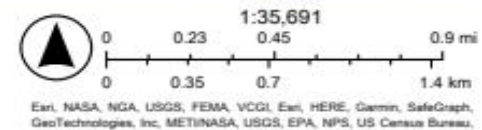
Map 1

25 May 2023



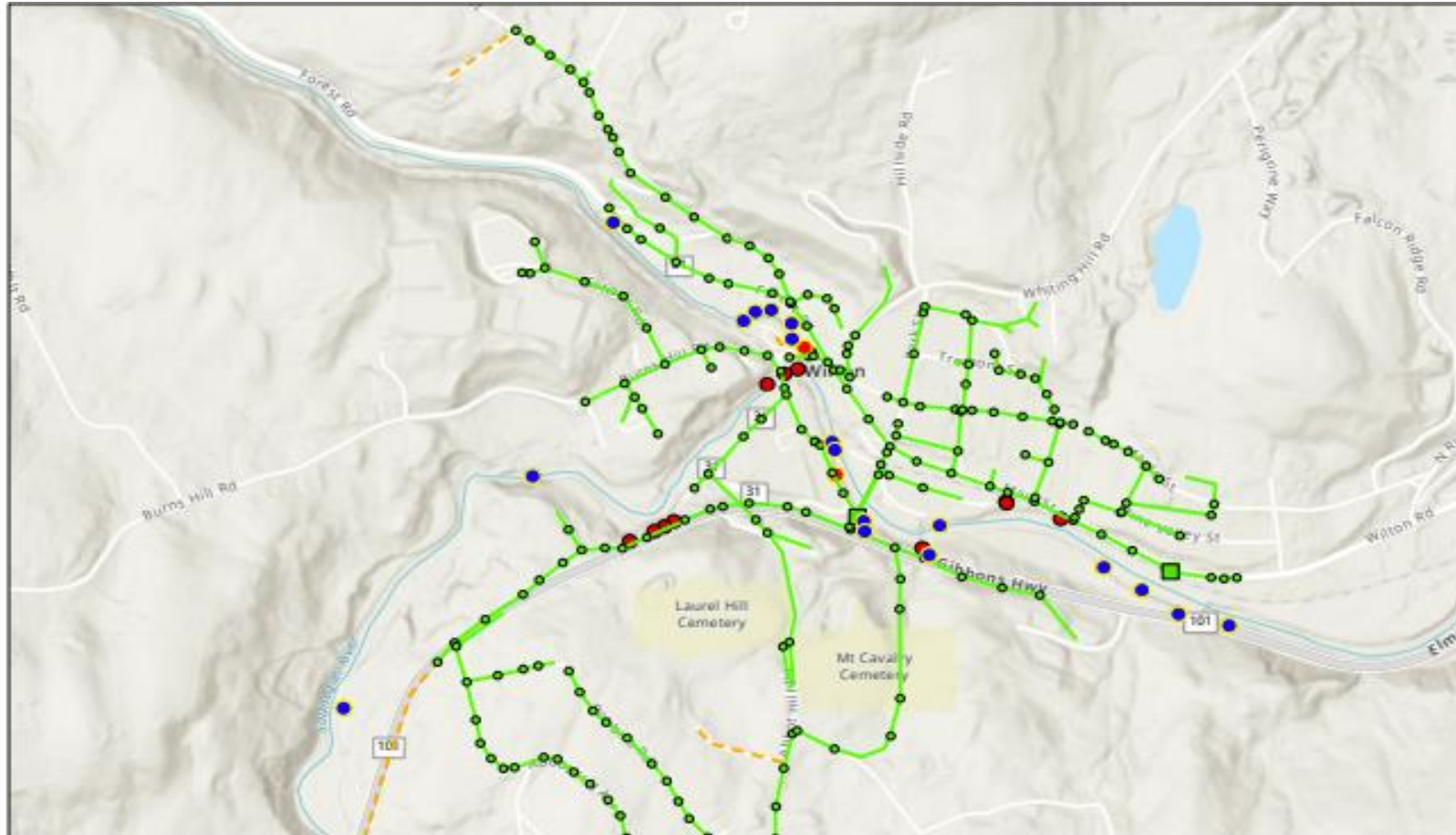
5/30/2023

- | | | |
|------------------------|----------------------|-----------------------|
| ● WSC Sewer Structure | ● Stormwater Outfall | — Wilton swale ditch |
| --- WSC Pressure Mains | ■ Stormwater Inlet | ■ WSC Vertical Assets |
| — WSC Gravity Main | — Stormwater Main | World Hillshade |



Map 2

24 July 2023

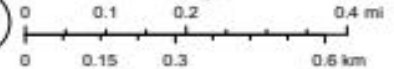


7/24/2023

- Wilton Outfall Sampling
- WW Vertical Assets_WFL1 - WSC Vertical Assets
- WSC Sewer Structure
- - - WSC Pressure Mains
- WSC Gravity Main
- Wilton_Outfall_Inspection



1:16,882



Eart Community Maps Contributors, VOGI, Eart, HERE, Garmin, SafeGraph, GeoTechnologies, Inc. METINASA, USGS, EPA, NPS, US Census Bureau.

Appendix C

Outfall Inventory and Priority Ranking Matrix

This appendix shall include a summary of the outfall priority ranking matrix, as provided to the Town of Wilton by the New Hampshire Department of Environmental Services. This matrix includes the address, identification, and impervious area of lots with high priority outfalls, as well as the total score of priority for those outfalls, based on a number of characteristics provided on the DES website. The higher a total score is, the higher the priority of the outfall is for implementation of a BMP.

Outfall Inventory and Priority Ranking: Town of Wilton

Street Address	In MS4 Area?	NH GIS ID	IC Area	Priority Score
291 Gibbons Highway	Yes	06230-D-104-00	2.44	
7 Burns Hill Road	Yes	06230-J-104-01	1.37	
89 Whiting Hill Road	Yes	06230-D-091-00	1.20	
102 Main Street	Yes	06230-K-062-00	0.90	
Russell Hill Road	No	06230-E-014-03	0.68	
Whiting Hill Road	No	06230-D-089-00	0.64	
7 Forest Road	Yes	06230-J-068-00	0.55	

Park Street	Yes	06230-K-179-00	0.48	
Gibbons Highway	Yes	06230-D-103-00	0.35	
Gibbons Highway	No	06230-C-116-00	0.34	
42 Main Street	Yes	06230-J-041-00	0.32	
Main & Park Streets Banking	Yes	06230-J-042-00	0.23	

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Appendix D

Field Forms, Sample Bottle Labels, and Chain of Custody Forms

This appendix shall include copies of the following sampling documents, in the order listed, as examples of the forms used to track and record results of the testing pertinent to the MS4 requirements and IDDE Plan for the Town of Wilton.

- Dry weather outfall sampling form
 - Wet weather outfall sampling form
 - Manhole inspection form
 - Sample labels (Milford Wastewater Treatment Facility)
 - Chain-of-custody form (Milford Wastewater Treatment Facility)
-

Dry Weather Outfall Water Quality Inspection

Stony Brook and Souhegan River - Wilton, NH

Background Information

Date of Sampling: _____

Form Completed By: _____

Sampler(s): _____

Outfalls Sampled: _____

Sampling Conditions

Air Temperature: _____ °C

Current Weather: _____

Precipitation:*

Past 24 Hours: _____ in.

Past 48 Hours: _____ in.

Date of Last Precipitation Event: _____



**Necessary Dry Weather Sampling Conditions:* No more than 0.1 inches of rainfall has occurred in previous 24-hour period and no significant snow melt has occurred.

Wet Weather Sampling and Outfall Identification Data

Town of Wilton, NH

Updated July 2023

Included Data

- ☐ *Outfall No. and Asset ID*
 - ☐ *Outfall Location and Receiving Waters*
 - ☐ *Outfall Material and Condition*
 - ☐ *Water Level, Flow, Odor, and Color Analysis*
 - ☐ *YSI Field Test Data*
 - ☐ *Biological Sample Collection Data*
-



Outfall #____:

Time Sampled: _____

Outfall ID: _____

Outfall Location: _____

Spatial Location (Long. / Lat.): _____

Receiving Water: _____

Last Inspection Date: _____

Material: _____

Condition (circle): Broken Poor Fair Good

Observation Codes (circle all that apply)

Water Level	Water Flow	Water Odor	Water Color	Observed Use
Very Low	No flow	Rotten Egg	Muddy	Swimming
Low	Flow	Chlorine	Silty(gray)	Fishing
Average		Musky	Green	Boating
High		Gas or Oil	Tea	Other
Very High		None	Cloudy	
		Other	Clear	

IF NO FLOW CONDITIONS STOP HERE

YSI Field Tests

YSI Site ID: _____

Test	Calibration Date	Reading
<i>Ammonia</i>		ppm
<i>Chlorine</i>		mg/L
<i>Conductivity</i>		μS/cm
<i>Nitrate</i>		mg/L
<i>Salinity</i>		ppt
<i>Temperature</i>		°C

Additional Samples Collected

- ☐ E. coli (Bacteria)
 - Time sample dropped off at lab: _____
 - Name of lab facility: _____
- ☐ Surfactants
- ☐ Impairment Pollutants
 - Pollutant(s) Sampled: _____

Souhegan and Lower Merrimack River Monitoring Program

Observations and Water Sample Collection Data Sheet

covers DO, E-coli, Air Temperature, Water Temperature, Turbidity, observations

Leave this sheet with water samples: Date 8/16/22 Sampler Name: Patrick Jackson

Previous Weather/Rain:

Saturday	Clear
Sunday	Clear
Monday	Clear
Tuesday (today)	Clear

Site # <small>Write it on the Whirl-Pak Bag tool- before it gets wet!</small>	DO Bottle Number <small>(Do not write or change number on bottle)</small>	Time Sampling Started	Air Temp. <small>(specify C or F)</small>	Water Temp. <small>(specify C or F)</small>	Turbidity <small>(place Whirlpak bag over white paper)</small>	Depth of Sample
Riverwalk Sc. R-212	428	7:05 a	13.3 °C	16 °C		6"

Time & Location Samples Dropped Off	Visual River Observations <small>(Use other side if necessary)</small>
8:12 Milford	Calm, quiet

Please report anything interesting or disturbing that you noticed at this site! (use back if necessary)

Observation Codes (Please circle all that apply)

Water Level	Water Odor	Water Color	Observed Use
Very low	Rotten egg	Muddy (brown)	Swimming
<u>Low</u>	Chlorine	Silty (gray)	Fishing
Average	Musky	Green	Boating
High	Gas or Oil	Tea	Other
Very High	<u>None</u>	Cloudy	
	Other	<u>Clear</u>	

Lab Use Only, E.Coli processed by	<u>Millford</u>	Merrimack	Nashua	Manchester
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Greenville, Milford, Merrimack, Nashua, Manchester

contact souhegan-river-monitoring@gmail.com

DO- 8.41 DOH 6.46

MILFORD WATER UTILITIES

Appendix E

Water Quality Analysis Instructions, User's Manuals and Standard Operating Procedures

This appendix shall include instructions and procedures for performing water quality analysis of all sample parameters using the relevant field equipment. This shall include the manufacturer instructions for the town's YSI field probe, as well as any additional manuals for field test kits or other instrumentation used in the field.

YSI Professional Plus User Manual:

<https://www.ysi.com/file%20library/documents/manuals/605596-ysi-proplus-user-manual-revd.pdf>

*[Refer to **YSI Pro Plus User Manual** pages 51-52 for water testing instructions]*

All sampling personnel are to don proper personal protective equipment (PPE) during the sampling procedure (gloves, proper footwear, pants, etc.)

Dry Weather Sampling:

- All samples are to be collected during 'dry weather conditions' which is defined as less than 0.1 inches of rainfall over the previous 24-hour period and no significant snow melt is occurring.

Wet Weather Sampling:

- All samples are to be collected during 'wet weather conditions' which is defined as greater than 0.1 inches of rainfall occurring at least 72 hours after the previously measurable (greater than 0.1 inch of rain) storm event

Procedure for conducting a field test using the YSI Pro Plus probe

- a. Turn on the meter by pressing the green circle button.
 - b. When the screen comes on, it should show at least a temperature reading in degrees Celsius or Fahrenheit depending on your chosen options, a barometric pressure reading in mmhg, and a specific conductivity reading in us/cm.
 - c. The next step is to make sure that both the conductivity and salinity results are being displayed. To turn these on is a two-step process.
 - First you click the probe button and then select setup. Look at the row that says conductivity and see if it says on or off next to it. If it says on, then you are all set but if it says off, click on conductivity. The next screen has a box that just be clicked to turn on conductivity. Click the box and it will turn it on. Then press escape to return to the main screen where the results are displayed.
 - Probe → Setup → Conductivity → Escape to return to main screen.
 - To turn on salinity, click the probe button. Then scroll down to display. From there scroll down to conductivity and click it. Then scroll down to salinity and click that as well. In this screen you will see three options.
-

You want to scroll down to ppt and click that. Then press the escape button which will take you back to the main menu.

- Probe → Display → Conductivity → Salinity → PPT → Escape
- d. Attach the ammonia (NH₄) sensor to the probe by removing the red cap at the end and screwing the sensor into port 2. Caution, nothing should be forced in or screwed in with abnormal tightness. This could strip or damage the connections and ruin the instrument. If properly aligned the sensor should easily be installed and fall into alignment without much effort.
- Then click the sensor button and choose setup.
 - Scroll down to ISE2 and then press enabled. Then press the NH₄ button this will enable the sensor.
 - Sensor → Setup → ISE2 → Enabled → NH₄ → enter
 - To display the Nitrate press sensor button and choose display scroll to NO₃ and press enter.
 - Sensor → Display → ISE2 → NH₄-N → enter
- e. Attach the Chloride (Cl) sensor to the probe by removing the red cap at the end and screwing the sensor into port 1. Caution, nothing should be forced in or screwed in with abnormal tightness. This could strip or damage the connections and ruin the instrument. If properly aligned the sensor should easily be installed and fall into alignment without much effort.
- Then click the sensor button and choose setup.
 - Scroll down to ISE1 and then press enabled. Then press the Cl button this will enable the sensor.
 - Sensor → Setup → ISE1 → Enabled → Cl → enter
 - To display the Nitrate press sensor button and choose display scroll to NO₃ and press enter.
 - Sensor → Display → ISE1 → Cl → enter
- f. The YSI screen should now have the following units displayed.
- The temperature in degrees Celsius/fahrenheit
 - The barometric pressure in mmHg
 - The conductivity in us/cm
 - The salinity in ppt
 - The ammonia in mg/L
-

- The Chloride in

- g. Now take the end of the cord with the sensor and submerge it in one of the water sample bottles. The important things to note here are that the sensor is fully submerged and that the two holes near where the cord begins are fully submerged as well. You may have to jiggle the sensor to keep refreshing the sample within the probe. If the water level is too shallow such that the probe cannot be fully submerged, then you will have to add more sample water.
 - h. It may take a few minutes for all of the readings on the YSI screen to stabilize. If the numbers keep jumping back and forth within a small range, you can take the average or one of the numbers it keeps stopping on.
 - i. Record the ammonia, specific conductivity, salinity, chloride and temperature on your tablet or field sheet making sure to note the units for each parameter.
 - j. Now take the end of the cord with the sensor and submerge it in one of the water sample bottles. The important things to note here are that the sensor is fully submerged and that the two holes near where the cord begins are fully submerged as well. You may have to jiggle the sensor to keep refreshing the sample within the probe. If the water level is too shallow such that the probe cannot be fully submerged, then you will have to add more sample water.
 - k. It may take a few minutes for all of the readings on the YSI screen to stabilize. If the numbers keep jumping back and forth within a small range, you can take the average or one of the numbers it keeps stopping on.
 - l. Record the Chloride and Nitrate on your tablet or field sheet making sure to note the units for each parameter.
 - m. Once you are done sampling with the YSI meter, take off the metal cage, and then rinse the whole sensor area with DI or distilled water. Make sure to get water into the two holes at the top of the probe.
-

Appendix F

IDDE Employee Training Record

This appendix shall include a record of all training events done by employees of the Town of Wilton, pertinent to this IDDE Plan or other parts of MCM #3 of the town's MS4 permit. Each log shall include the date that the training was performed, as well as a general description of the training event; this may include the entity hosting the event, the software used to do the training, or a brief description of the training content. Each log shall also include the names of any Wilton employee who participated in the training, as well as the names of any instructors present to provide the training.

Illicit Discharge Detection and Elimination (IDDE)
Employee Training Record
Town of Wilton

Date	Type of Training	Participants
6/06/2023	Underwood Engineers – How to Use Survey123	Margaret Blank, Nick Germain, Patrick Jackson, Mike Tatro
6/20/2023	Underwood Engineers – Catchment Delineation Software	Margaret Blank, Bill Kiechle, Nick Germain, Patrick Jackson
6/27/2023	In-House Training – Survey123 Practical Applications	Patrick Jackson, Anna Crane
8/17/2023	Underwood Engineers – Outfall Criticality and Financial Data	Margaret Blank, Nick Germain, Patrick Jackson,

Appendix G

Source Isolation and Confirmation Methods: Instructions, Manuals, and SOPs

This appendix shall include all manufacturer instructions, manuals, and any standard operating procedures unique to Wilton used to perform discharge source isolation and confirm the location of illicit discharges.