ILLICIT DISCHARGE, DETECTION AND ELIMINATION PROGRAM

FOR

EAST HUNTINGDON TOWNSHIP

WESTMORELAND COUNTY, PA

REVISED APRIL, 2025

PREPARED BY:

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SUMMARY

This Program is developed to assist the Township or its designated representative in the detection and elimination of illicit discharges within the Urbanized Area of the Township. The Urbanized Area of East Huntingdon Township encompasses most of the developed areas within the Township. Areas include the villages of Ruffsdale, Tarrs, Central, Iron Bridge, Alverton, North Scottdale, Thornwood and Pinetree. There are also portions of developed areas adjacent to Scottdale and Mt. Pleasant Boroughs that are Urbanized Areas. The Ruffdale, Tarrs and Central areas are tributary to Buffalo Run, a tributary to Sewickley Creek. All other areas are part of the Jacobs Creek watershed. Receiving streams in the Jacobs Creek watershed include Stauffer and Sherrick Runs.

This Program includes the following components:

- General information on Illicit Discharges
- Components of the Program
- Implementation

<u>GENERAL</u>

An illicit discharge is defined by Federal Regulations as any discharge to a Municipal Separate Storm Sewer System (MS4) that is not composed entirely of storm water, except discharges allowed under an NPDES permit or waters used for fire fighting operations. Non storm water discharges occur due to illegal connections to the MS4 from residential, commercial or industrial facilities.

Sources of Illicit discharges can include the following:

- Sanitary wastewater
- Effluent from septic systems
- Car wash wastewaters
- Improper oil disposal
- Radiator flushing disposal
- Laundry wastewater
- Spills from vehicle accidents
- Improper disposal of auto and household toxics

Illicit Discharges are "illicit" because MS4's are not designed to accept, process or discharge such non storm water wastes. Illicit discharges can be intentional or unknown to the property owner.

The goal of the illicit discharge and detection program is to identify, correct and prevent discharges to the MS4 that contaminate surface and ground waters.

PRIORITY AREAS

Priority areas are areas that have a higher likelihood of illicit discharges, illicit connections and illegal dumping. Commercial and industrial areas are considered high risk areas. Any area where illegal dumping has previously occurred is also considered to be high risk. Priority areas are established as follows in order of decreasing priority:

- 1. Areas where illegal dumping has previously occurred
- 2. Industrial areas
- 3. Commercial areas
- 4. Areas without a centralized sewer system
- 5. Other areas

The Urbanized Areas of East Huntingdon Township are a mixture of residential, commercial and small industrial development. Residential development typically dominates the Urbanized Areas. There are scattered commercial and small industrial uses throughout the Urbanized Area. Many of the roads within the Urbanized Area are PADot routes. This includes the Route 819 corridor south of Mt. Pleasant Borough, Route 31 in Tarrs and Ruffsdale, SR 0981 in Alverton, SR 3089 in Ruffsdale, Thornwood and Alverton, SR 3073 in Ruffsdale, SR 3083 in Pinetree and SR 3105 in Iron Bridge. As a result, there are many areas within the Urbanized Area where there are not any Township storm sewers or outfalls. A total of 42 outfalls have been identified in the Urbanized Area. A total of 19 of these are located in the Ruffsdale-Tarrs-Central area. Eight are located in North Scottdale and four are located in Alverton. An additional nine are located adjacent to Scottdale Borough with the remaining two near Mt. Pleasant Borough. Due to the nature of the Urbanized Area no priority areas have been established.

OUTFALL SCREENING PROCEDURE

Each outfall will be screened during the term of the NPDES Permit. Approximately 25% of the outfalls are screened per year. Outfalls will be screened during dry weather. The procedure for screening each outfall will be as follows:

- 1. Complete the applicable portions of Section 1 (Background Data) and Section 2 (Outfall Description) on the Outfall Reconnaissance Inventory Sheet.
- 2. Observe the outfall for dry weather flow.
- 3. If no flow is observed, Complete Sections 5 and 6 on the Outfall Reconnaissance Inventory Sheet.
- 4. If flow is observed, Complete Sections 3, 4, 5 and 6 on the Outfall Reconnaissance Inventory Sheet.
- 5. If Indicators of Illicit Discharges are identified in Sections 4 and 5 an attempt should be made, utilizing the outfall/storm sewer maps, to isolate the source of the Illicit Discharge to a subarea of the contributory storm sewers.
- 6. Unless the type of Illicit Discharge can be identified (e.g. sewage, oil) from the Indicators or by on site testing then additional sampling/testing is required. Additional testing shall be performed by a laboratory certified to perform the test by the appropriate regulatory agency.

DETERMINING THE SOURCE OF ILLICIT DISCHARGE

In the event an Illicit Discharge is identified through Field Screening, an attempt must be made to determine the source of the discharge. The type of Illicit Discharge will determine the steps necessary to determine the source.

Sewage related discharges in areas without a centralized sanitary sewer system can be identified through an inspection program of individual structures or by dye testing. Court orders may be required to conduct dye testing of suspected dischargers if voluntary permission is not granted. In areas with a centralized sanitary sewer system cameras can be employed to televise the existing system to find leaking sewer pipes.

Where the Illicit Discharge is not sewage related the characteristics of the discharge should be utilized to determine the possible source based on the industrial and commercial establishments located within the subarea and their potential for Illicit Discharges. If there are no industrial or commercial establishments located in the subarea an attempt should be made to trace the discharge through the contributory storm sewer system. If the Discharge is intermittent it may be necessary to conduct additional screenings to determine the source.

CORRECTION OF ILLICIT DISCHARGES

In the event Illicit Discharges are detected an attempt to eliminate them must be made. Sewage related discharges can be eliminated through extension of sanitary sewers where available or by on lot corrections, if possible. It may not be possible to eliminate on lot discharges where sanitary sewers are not available due to soils, lot size or isolation distance issues. The Township is able to eliminate Illicit Discharges from industrial or commercial properties through legal means, if necessary.

<u>RECORDS</u>

The Township must document all actions taken to implement the plan. This includes completion of the Outfall Reconnaissance Inventory Sheets, the number of outfalls screened, illicit discharges detected and illicit discharges eliminated.

An Illicit Discharge Complaint Form is attached. Records of complaints received and their disposition will be retained as required by the Township Code.

Name:	Contact Phone Number:
Date:	Time Discharge Discovered:
Location of Discharge:	
Where was discharge fo	ound?Open DitchStreamPipe Outfall Other
Was water flow observe	ed?NoYes
Was a photo taken?	NoYes (Attach a copy to form if available)
Odor:	None Sewage Musty Gas/Oil Other (Describe)
Color:	Clear Grey Red Yellow Green Other (Describe)
Clarity:	Clear Cloudy Opaque
Was there an:	Oily SheenYesNoDebris/SewageYesNoOther (Describe)
Additional Information:	
	FOR MUNICIPAL USE ONLY
Outfall Number:	Inspector:
Field Analysis: _	Water temperatureAmmonia Nitrogen pH
Was a Laboratory Samp	e Collected? No Yes (Attach report)
Comments:	
Signature of Inspector:	Date:
Follow Up with Complai	nant:

ILLICIT DISCHARGE COMPLAINT FORM