

Town of Huntington

Illicit Discharge Detection and Elimination Program (IDDEP) Plan



Town of Huntington

Department of Maritime Services

September 2012

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I. Overview

An illicit discharge is generally any discharge, release, or pumping of a pollutant or polluted water into the stormwater system. The National Pollutant Discharge Elimination System (NPDES) regulates the discharge of stormwater under the authority of the Federal Clean Water Act. The New York State Department of Environmental Conservation (NYSDEC) has the designated authority to administer NPDES within the state of New York. Under this authority, NYSDEC has issued SPDES General Permit for Stormwater Discharges GP-0-10-002, regulating the discharge of stormwater for municipalities. The Town of Huntington (hereafter referred as 'the Town') is under the regulation of the aforementioned Permit.

The Phase II permit mandates permittees to prepare and implement an Illicit Discharge Detection and Elimination (IDDE) program. This plan and its implementation satisfy this requirement. The goal of this plan is to identify and then eliminate illicit discharges. Examples of illicit discharges include:

- Direct or indirect sanitary wastewater discharges that connect to the storm sewer or watercourse, such as a shop floor drain connected to a storm drain, a crossconnection between the municipal sewer and storm sewer systems, a damaged sanitary sewer line that is leaking sewage into a cracked storm sewer line, or a failing septic system that is leaking into a water course.
- Materials (e.g., used motor oil) that have been dumped illegally into a storm drain catch basin.
- Improper home or business owner activities such as washing paint brushes into a catch basin, washing new textured concrete driveways into a storm drain, draining swimming pools to the storm system (swimming pools have high pH and chlorine), excess use of fertilizers, or washing cars with chemicals that enter the storm drain system.

The NPDES Permit sets forth the minimum elements of the plan which are listed below. These minimum elements are described throughout the remainder of this document.

- Municipal Storm Sewer System Mapping
- Ordinances (that effectively prohibit illicit discharges)
- Detection and Elimination Program
- Public Education
- Staff Training

II. Municipal Storm Sewer System Mapping

A. Current Program

The Town of Huntington (ToH) currently has the following stormwater-related information in its' GIS database:

- Stormwater conveyance systems
- Outfalls
- Catch basins and manholes
- Streams (watercourses)
- Surface waters

The current program is compliant with the NPDES permit requirements and is completed in advance of the established February 2011 deadline within the permit.

Some of the more specific elements of the program as required by the permit are listed below:

- 1. A map of all structural BMPs owned, operated, or maintained by ToH.
- 2. For pipe outfalls 24-inch-diameter pipes and watercourse outfalls, a map with the following attributes for each outfall, tributary conveyances (type, material, and size where known), associated drainage areas, and land use. Although most of the watercourses and pipes have a cross-sectional area less than a 24-inch-diameter pipe, ToH has elected to consider and map all of the known pipe outfalls and stormwater conveyance watercourses.
- 3. A map of areas of ToH that do not discharge stormwater to surface waters. This would be any enclosed depression, isolated wetlands, or large areas relying on infiltration.

III. Ordinances

A. Current Ordinances

The Town's IDDEP is regulated, functions and permits enforceable actions via the following ToH code:

- Town Code §55 Water Conservation Practices
- Town Code §111 Fire Prevention
- Town Code §117 Solid Waste Management: Collection, Recycling and Disposal
- Town Code §120 Harbors and Waterways
- Town Code §164 Sewer Use Management
- Town Code §170 Stormwater Management
- Town Code §195 Waste Management
- Town Code §198 Zoning

IV. Detection and Elimination Program

A. Current Resources

ToH currently has five staffed programs that fulfill portions of a complete IDDEP:

- The Towns's "Huntington @ Your Service" web-site,
- The Town's Department of Public Safety 24-hour resident response call-in program,
- The Town's Department of Maritime Services First Responder Team for spill response,
- The Town's Department of Maritime Services Stormdrain/Outfall Inspection Team, and
- Utility inspections of stormwater conveyance systems, both public and private, performed by the Town's Engineering Services Building Department staff and the Town's Highway Department staff.

The Town's "Huntington @ Your Service" web-site acts as a hotline that citizens can utilizes at any time to report a potential illicit discharge.

"Huntington @ Your Service" web-site:

http://huntingtonny.qscend.com/

The Town's Department of Public Safety maintains a 24-hour call-in number at 631-351-3167. The call-in personnel will then enter the complaint/report into the Town's "Huntington@ Your Service" contact the appropriate Town department/staff to visit the location of the complaint if appropriate.

The Town's Department of Maritime Services First Responder Team responds to all calls from citizens regarding spills and illicit discharges and is on-call 24-hours. If the emergency is a major spill or associated with a hazardous chemical, NYSDEC and the appropriate local volunteer fire department(s) are notified.

The Town's Department of Maritime Services Stormdrain/Outfall Inspection Team performs routine inspections of stormwater conveyance systems and outfall to determine the existence of possible illicit discharges.

The Town's Engineering Services Building Department staff and the Town's Highway Department staff inspect the stormwater conveyance system(s) of new construction to ensure that no cross-connections or illegal connections are installed during construction prior to issuing certificates of occupancy. The Town's Highway Department maintains and repairs the public stormwater conveyance system as needed. By making timely repairs to the existing stormwater system and inspecting existing systems during routine maintenance procedures, the likelihood of contaminants entering the stormwater system from the surrounding ground or nearby sanitary sewer pipes is greatly reduced.

Both the Town's Engineering Services Building Department staff and the Town's Highway Department staff are available to respond to complaints forwarded by the Customer Response Team.

B. <u>Proactive Investigation</u>

In addition to maintaining a hotline (the Town's "Huntington @ Your Service" web-site and the Town's Department of Public Safety 24-hour resident response call-in program for citizen complaints), the Town is required to proactively conduct field assessments to check for illicit discharges and illegal connections to the Town's stormwater conveyance systems and receiving waterbodies. These functions are performed by the Town's Department of Maritime Services Stormdrain/Outfall Inspection Team. Inspections are typically performed during "*dry weather*" conditions, indicating that at the inspection location no precipitation has occurred less than 72 hours prior to inspection activities. Inspections may be performed during non-"*dry weather*" conditions based on the severity of the situation.

The first step of this proactive work is to prioritize those areas most likely to contain illicit discharges ("hot spots") based on an analysis of land use and other specific information. The following types of areas are more likely to generate polluted discharges than others (Center for Watershed Protection & Pitt, 2004):

- Locations where there have been repeated problems in the past. This could include areas with water quality data or where repeated complaints have been filed.
- Older areas of a community typically have a higher percentage of illegal connections. Also, deteriorating sewer pipes can allow wastewater to exfiltrate out of the sanitary lines and into the surrounding environment.
- Commercial and industrial areas tend to have a higher percentage of illicit discharges.
- Areas with large and/or many storage vessels used for the containment of hazardous solids or liquids.

Another consideration for the Town is the proximity of the higher risk land uses (commercial/industrial) to receiving waters. These areas will have a short flow path and greater chance of adversely affecting a larger aquatic system in the event of an illicit discharge or spill.

The Town's Department of Maritime Services Stormdrain/Outfall Inspection Team proactively conducts field assessments to check for illicit discharges and illegal connections to the Town's stormwater conveyance systems and receiving waterbodies on a monthly basis. During each "dry weather" inspection, Team personnel make visual observations and collect data on the physical conditions within catch basins of the Town's stormwater conveyance systems and at outfalls. In the event that the Team notes strong evidence of sanitary waste within a specific location of the Town's stormwater conveyance system or at an outfall, field test kits may be utilized to test for the presence of coliform bacteria.

C. General Field Assessment Procedures

The following general recommendations apply to the dry weather field inspection of stormwater conveyance systems and at outfalls:

- Develop and implement training and protocols to keep workers safe during field work.
- Utilize existing mapping information that has been developed by the Town and Suffolk County.
- Fill out a Town of Huntington "*Storm Drain Inspection*" form to document activities and/or findings.

D. Physical Parameters

During dry weather field inspections, a variety of physical parameters will be recorded at each site to assess conditions. At flowing outfalls this includes flow, odor, color, turbidity, and presence or absence of floatables. The information that is obtained from the physical characteristics observed are indicators and cannot be fully relied upon by themselves as proof that an illicit discharge has occurred or is occurring.

A qualitative observation of flow (none, trickle, moderate, or substantial) should be made. Flow rates can be estimated by one of the following simple methods:

- Record the time required for the full flow to fill container of a known volume.
- Multiply cross-sectional flow area by flow velocity. For most instances, flow area is based on an estimate of mean depth and width. Flow velocity is based on the time of travel for an object floating near the surface over a known length.

Odor is described by one of the following terms sewage, rancid/sour, petroleum/gas, sulfide, or other. The severity of the odor should also be recorded in the field.

Color can be a description of color type and intensity. It is also a quantitative measurement expressed in cobalt-platinum units (APHA, 1998).

Turbidity can be a qualitative descriptor (clear, slight cloudiness, cloudy, or opaque). Alternatively, it can be measured in the field or in the office with a hand held turbititimeter.

Floatables are the best physical indicator. The most common floatables are sewage, suds, and oil sheens. Floatables do not include trash. The observation of sewage at an outfall location indicates that there is a severe problem with that MS4 and should be looked at as to where the source for the sewage is emanating from. Suds can indicate a variety of things. Some suds are naturally formed by the movement of the water. If the suds are located at a water drop off and break up quickly, this may only be water turbulence related. If the suds have a fragrant odor, this can indicate the presence of laundry water or wash water in the waterbody. Oil sheens need to be looked at to try and determine the source of the oil sheen. Some oil sheens are common and occur naturally by instream processes. This occurs when an iron bacteria forms a sheet-like film. This can be determined by looking at the sheen and seeing if it cracks when disturbed. Synthetic oil sheens, on the other hand, will swirl when disturbed. If this occurs, then the sheen is from an oil source.

The Town may select a few water quality parameters that can be measured with inexpensive probes and test strips in the field. These include temperature, pH, ammonia, conductivity, chlorine, and hardness.

There may be physical indicators of illicit discharges even if no flow is present. These include: outfall damage, deposits/stains, abnormal vegetation, poor quality of pooled water, benthic growth in pipe.

During a dry weather inspection, observed flows are considered non-stormwater related. The flow may or may not be the result of an illicit discharge. Also, the absence of a flow does not indicate the absence of an illicit discharge since these discharges can be intermittent or transitory. It is important to observe carefully during the dry weather inspection to determine if an intermittent or transitory pollution problem has occurred.

E. Immediate Response Procedures

ToH staff working as members of the Department of Maritime Services First Responder Team, the Department of Maritime Services Stormdrain/Outfall Inspection Team, the Engineering Services Building Department and the Highway Department should be prepared to take immediate action in the event of encountering one of the following situations:

- Individuals actively in the process of introducing possible illegal substances or materials to the storm drain system
- Very strong chemical odor emanating from storm drain system
- Presence of fumes or smoke emanating from storm drain system
- Visible significant stream of a controlled chemical or petroleum product flowing in storm system or downstream waters

- Large chemical plume in surface waters downstream of a Town outfall
- Any condition that poses or could pose an immediate threat to property, human health or safety, or aquatic life.

ToH staff should take the following steps if one of the above situations is encountered:

- 1. Ensure crew safety and the public by instructing people to stay clear of the area.
- 2. Contact the Town's Department of Public Safety at 631-351-3167 to report active illegal dumping or potential fire or significant chemical incident.
- 3. The following offices must all be called if an unauthorized discharge of oil or hazardous material such as a spill has occurred:
 - The National Response Center at 1-800-424-8802
 - New York State Department of Environmental Conservation at 1-800-457-7362
- 4. If a spill is encountered the following information should be recorded if possible:
 - Where is the spill?
 - What spilled?
 - How much spilled?
 - How concentrated is the spilled material?
 - Who spilled the material?
 - Is anyone cleaning up the spill?
 - Are there resource damages (e.g. dead fish or oiled birds)?
 - Who is reporting the spill.
 - Your contact information.
- 5. ToH staff/personnel will not attempt to clean up or contain any spilled material unless they have received the appropriate level of spill response training and are current on that training. If a staff member's training is appropriate and current, the staff/personnel will, if possible, isolate or contain visible chemical pollution in the effected waterbody with any supplies/materials that are accessible. For small discharges, earth dams, absorbent pads, and containers may be useful to contain part of the illicit discharge.

6. ToH spill response personnel will create detailed notes and photos/video for subsequent investigation by the Town or other agencies. Depending on the amount(s) of material released/spilled, follow-up work includes contacting the New York State Department of Environmental Conservation (see phone number above) to determine if any additional reporting or investigative actions are necessary. For incidents not determined to be emergencies, the Town shall investigate or refer to the appropriate agency any complaints, reports, or monitoring information that indicates a potential illicit discharge, spill, or illegal dumping.

F. Isolating Illicit Discharges (Source Tracing)

The Town's "Huntington @ Your Service" web-site and the Town's Department of Public Safety 24-hour resident response call-in program for citizen complaints are effective tools for locating illicit discharges. However, in situations where outfall screening identifies an illicit discharge several methods can be used to trace to the source of the illicit discharge. Tracing techniques include visual inspections of drainage structures and lines, dye testing, damming lines to isolate areas, video inspection, indicator monitoring, and smoke testing. Other more elaborate approaches include using remote sensing tools to identify soil moisture, water temperature, and vegetation anomalies associated with failing septic systems and tracking illegal dumping activities. The most common approach for the Town will likely rely upon visual inspections of the catch basins in the storm line above the outfall in which an illicit discharge is suspected.

Several resources exist to assist in evaluating the likely source of an illicit discharge. Generally, the sources are washwater, sanitary sewer or septage, potable water leak, animal contamination, illegal dumping, or industrial discharge.

G. Investigation and Response Procedures

Once an illicit discharge or illegal connection has been located, details about the discharge connection should be documented. Photographs and video may be helpful to record the location and nature of an illicit connection. The Town shall determine the name and contact information of the property owner from which the illicit discharge is sourced if possible.

The response by the Town will vary greatly depending on the type, location, frequency, severity, and source of illicit discharge. In general, the Town has several options available to address a specific discharge. In most cases where the violator is identified it is expected that they will voluntarily comply with any action required by the Town to eliminate the potential for further illicit discharges. When the violation is the result on an illegal connection from a building, the property owner should respond once they are made aware of the connection, the environmental consequences, the applicable regulations, and the recommended remedy.

The Town will prepare a letter to be sent to the property owner for any illicit discharge or illegal connection. Depending on the circumstances the letter will describe the findings of the investigation, the required remedy, the required deadline for compliance, and the enforcement actions, fines, and legal actions that could ensue for non-compliance. The letter will also describe the relevant codes and laws. The letter will specify who the property owner should contact for additional information and to notify the Town when the required remedy has been completed.

The Town will conduct a follow-up inspection following notification that the required remedy has been completed.

Should the owner not remedy the discharge, the Town may proceed to abate the violation as a public nuisance as well as to seek equitable payment to make this remedy.

V. Public Education

A. Public Information

As part of the Town's stormwater pollution public outreach program, outreach material in print form will be made available to citizens. The education campaign will also rely upon the Town's website (http://huntingtonny.gov/department_details.cfm?ID=61), brochures and/or fact sheets to make citizens aware of storm water, water pollution, and inform them of the Town's hotline contact systems ("Huntington @ Your Service" web-site [http://huntingtonny.gscend.com/] and the Department of Public Safety's 24-hour call-in number at 631-351-3167) for reporting possible illegal dumping, connections, or discharges.

VI. Reporting and Recordkeeping

A. <u>Tracking (Spills, Inspections, and Public Comment/Feedback)</u>

Tracking and documentation is a required part of the IDDE program (section S5C3e).

Spills reported to the "Huntington @ Your Service" web-site (<u>http://huntingtonny.qscend.com/</u>) logged into the system and, if appropriate, the Department of Maritime Services First Responder Team, the Department of Maritime Services Stormdrain/Outfall Inspection Team, the Engineering Services Building Department or the Highway Department will be contacted.

All Town spill response/investigation organizations shall utilize the "*Town of Huntington Spill Report*" form to report and document the discovery of spills and/or illicit discharges.

The Department of Maritime Services Stormdrain/Outfall Inspection Team documents inspection activities and findings using the Town of Huntington "*Storm Drain Inspection*" form.

Individual departments within the Town of Huntington that perform periodic Stormwater inspections of their facilities utilize the Town of Huntington "*Stormwater General General Inspection Checklist*" form to document their activities and/or findings.

"Town of Huntington Spill Report" and Town of Huntington *"Storm Drain Inspection"* forms are logged and maintained by the Town's IDDEP Manager (Bob Litzke). Town of Huntington *"Stormwater General General Inspection Checklist"* forms are maintained by department that performed the inspection, with copies forwarded to the Town's IDDEP Manager (Bob Litzke).

Public comment/feedback obtained via the "Huntington @ Your Service" web-site (<u>http://huntingtonny.qscend.com/</u>) will be conveyed to the Town's IDDEP Manager (Bob Litzke) to ensure that the Town's IDDEP is responsive to citizen complaints. The public will be directed to either the program manager directly if they have general comments they would like to make regarding the Town's IDDEP.

VII. Staff Training

A. <u>Training Lead</u>

For those Town personnel/staff responsible for implementing or participating in the Town's IDDEP, training is managed by the City's IDDEP Manager, Bob Litzke. He will manage, assign and document training as described below:

B. Spill Response Training

Detailed draining will be assigned to those individuals assigned to participate in immediate spill response procedures, illicit discharge inspection/investigation activities and source tracking of potential illicit discharges. Detailed training includes (but is not limited) to HAZWOPER First Responder initial and annual refresher training. Examples are personnel assigned to the Town's Department of Maritime Services First Responder Team and the Town's Department of Maritime Services Stormdrain/Outfall Inspection Team.

C. General Training

General training will be via DVD instructional presentation and printed material distributed to staff at periodic stormwater pollution prevention training events for Town employees. This training is provided on a quarterly basis.

VIII. References

The following references were used to prepare this plan and contain supplemental information that may be helpful to Town staff and the general public.

 Center for Watershed Protection and Robert Pitt. Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments. October 2004. U.S Environmental Protection Agency. Washington, D.C.

Website for download:

http://www.cwp.org/Resource_Library/Controlling_Runoff_and_Discharges/idde.htm

 New England Interstate Water Pollution Control Commission. Illicit Discharge Detection and Elimination: A Handbook for Municipalities. January 2003. Lowell, Massachusetts

Website for download: www.neiwpcc.org

Appendix A

DRY WEATHER MONITORING/SAMPLING GUIDANCE

- 1. The field equipment listed below is used to conduct dry weather monitoring.
 - Clipboard, pens, pencils, Sharpie or other waterproof pens
 - MS4 GIS maps
 - Digital camera
 - Field notebook
 - Latex gloves
 - Protective eyeglasses or goggles
 - Rubber boots/protective footwear
 - Measuring tape for measuring stream width
 - Folding scale for measuring stream depth
 - Wristwatch
 - Hi-visibility safety vest
- 2. Record all qualitative observations and field testing results on the field data sheet. Estimate the flow rate (if applicable) and note any changes to standard procedures (for whatever reason). Describe any unusual or noteworthy conditions or results in detail on the bottom of the form.
- 3. Health and Safety

Dry weather water sampling may occur when the sampling environment and discharges create hazardous conditions. Use safety precautions at all times when conducting dry weather monitoring. Observe the following safety guidelines:

- Keep a first aid kit with field equipment.
- Watch out for traffic along roadways when sampling or making observations.
- Do NOT remain in open areas or stand under trees if lightning is occurring in the vicinity.
- Watch your step; the ground may be wet and slippery, steep, or unstable. Do not attempt to climb down unsafe slopes.
- Always wear clean latex rubber gloves when sampling.
- Protect eyes and skin against contact with acids and other preservatives.
- Use common sense when deciding whether to sample during adverse weather conditions. *This program is intended to assess dry weather conditions*. Do not sample during dangerous conditions such as high winds, lightning storms, or flooding conditions that might be unsafe.
- Do not enter channels during periods of high flow. The general rule of thumb is: If the product of the water depth in feet and the velocity in feet per second is greater than 10, or the level is above your waist, don't go in.
- Do not enter confined spaces

Appendix B: "Town of Huntington Spill Report" Form



TOWN OF HUNTINGTON SPILL REPORT FORM

Town Spill#	NRC Rpt#	NYS DEC Spill #
SCPD CC # SC DH	IS#	Rec'd by & Department
DateW	Veather	
Complainant NameAddress		Location of Spill
Phone # Lot		DistrictSectionBlk.
Spiller Name Address Phone # Drivers L		Material Spilled
Clean up Company Representative Address		Cause of Spill
Phone #		Extent of Impact
Agencies Notified: Date and Time		Agencies on Scene: Date and Time

Town Personnel and Equipment Used/Additional Information:

Submitted by_____

Spill report form 2006

TOH DMS IDDEP Plan; 091312 Rev3

Appendix C: Town of Huntington "Storm Drain Inspection" Form

Storm Drain Inspection Form - DMS, Town of Huntington

Date	Time	Location	Flow Volume	Flow Source	Clarity	Debris/Pollution Type	Debris/Pollution Amt.	Odor
			• None	 Condensate 	o Clear	o None	o None	o None
Inspect	or:		 Trickle 	 Groundwater 	 Cloudy 	 Foam, Brown 	o ¼ Full	 Chemical
			 Steady 	 Irrigation 	 Opaque 	 Foam, White 	o ½ Full	 Petroleum
			0 High	 Residual SW 	o N/A	 Petroleum Sheen 	o ¾ Full	 Sewage
				 Unknown 		 Organic Material (s) 	 Plugged 	
				o N/A		 Sand/Soil 		
						o Sewage		
						 Trash/Debris 		
Precipit	ation in la	ast three days:	o Yes o No					
Structu	ral Condit	ion: o Excel	llent o Good	o Fair o Poor				
Nearby	Nearby activities that could impact storm water quality: \circ Yes \circ No \downarrow (If yes, describe below) \downarrow							
Immedi	Immediate actions taken: O Yes O No Description:							
Follow-up actions required: O Yes O No Description:								

Appendix D: Town of Huntington "Stormwater General General Inspection Checklist" Form

Town of Huntington Stormwater Pollution Prevention (MS4 Program) Facility General Inspection Checklist

This inspection checklist will be used by facility managers to -

Conduct general inspections, and

Determine if additional Best Management Practices (BMPs) may be required.

Department:	Date:
Location:	Time:
Facility Staff:	
SWMP Personnel:	

GOOD HOUSEKEEPING				ne)
1.	Are outside areas kept neat, clean, and orderly?	Yes	No	N/A
2.	Are storm drain inlets labeled "No Dumping"?	Yes	No	N/A
3.	Are garbage cans, waste bins, and dumpsters covered?	Yes	No	N/A
4a.	Has the stormwater conveyance system been recently altered?	Yes	No	N/A
b.	If 'Yes', does the alteration maintain SWPPP compliance?	Yes	No	N/A
5.	Are stormwater drainage paths clear? Grates clean?	Yes	No	N/A
6a.	Are vehicles or equipment cleaned at this facility?	Yes	No	N/A
b.	If ' Yes ', is wash water being collected and disposed of properly?	Yes	No	N/A
HAZ	ZMAT STORAGE			
7a.	Are vehicles fueled at this location?	Yes	No	N/A
b.	If 'Yes', are fuel tanks locked and/or properly operated?	Yes	No	N/A
c.	If ' Yes ', are measures taken to protect storm drains from spills?	Yes	No	N/A
Brie	fly describe:			
9.	Do aboveground tanks (liquid) have secondary containment?	Yes	No	N/A
10.	Are containment structures or surface slabs liquid tight?	Yes	No	N/A
11a.	Does this site store hazardous materials such as solvents, pesticides			
	or acids?	Yes	No	N/A
b. If ' Yes ', are containers weathertight or covered?				N/A
c.	If 'Yes', are ignitable or reactive wastes stored at least 50 feet from the			
	property line?	Yes	No	N/A
12a.	Has the facility had a hazardous waste spill since the last inspection?	Yes	No	N/A
	If ' Yes ', was the problem resulting in the spill corrected?	Yes	No	N/A

OTHER BEST MANAGEMENT PRACTICES (BMPs)					(Circle One)		
13a.	• Does this site store hazardous or other materials that could impact						
	the storm drain such as detergent, paint, or powders?				No	N/A	
b.	If 'Yes', are they	stored in a manner pr	ohibiting exposure to rain				
	or runoff?			Yes	No	N/A	
14.	Are waste materi	als kept on site in clos	sed leak-tight containers?	Yes	No	N/A	
15.	Are all leaking v	ehicles and/or equipm	ent equipped with drip pans?	Yes	No	N/A	
16.	Are erodible soil	s uncovered or expose	ed to rainwater?	Yes	No	N/A	
17a.	Is the ground sur	face stained by oil or	significant materials?	Yes	No	N/A	
b.	If 'Yes', has the	source been found and	l contained?	Yes	No	N/A	
18.	Are truck unload	ing areas covered?		Yes	No	N/A	
19.	Does the facility	have wastes, products	s, salvaged materials and				
	recyclables	s stored properly?		Yes	No	N/A	
20a.	a. Does the facility have a clarifier/oil/water separator?			Yes	No	N/A	
b.	If 'Yes', is it clea	an and functioning pro	perly?	Yes	No	N/A	
21a.	• Has this facility received a complaint regarding stormwater discharge?			Yes	No	N/A	
b.	•. If ' Yes ', has the problem been addressed?			Yes	No	N/A	
22.	Have personnel received training on Stormwater Pollution Prevention?			Yes	No	N/A	
23.	Are spill respons	e materials on availab	le? (Check all that apply)	Yes	No	N/A	
Sand		Rice Hulls	Sorbent Booms/Pillows/Blankets				
Kitty	Litter	Neutralizer	Drip Pans				
Othe	r (please list)						

24. Identify other significant best management practices employed to reduce pollutants in stormwater discharges (check all that apply; describe conditions if applicable):

Good Housekeeping	
Containment	
Berms	
Leachate Collection	
Sand Filter	
Recycling	
Retention Facilities	
Silt Fence	
Spill Mitigation	
Oil/Water Separator	
Dead-end Sumps	
Other	

25. Action Items

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