ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) PROGRAM

MS4 PERMIT ID NO. NYR20A518

PUTNAM VALLEY CENTRAL SCHOOL DISTRICT

146 PEEKSKILL HOLLOW ROAD
PUTNAM VALLEY, NY 10579

OCTOBER 2025

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SUPPLEMENTAL DOCUMENTS

1 INTRODUCTION

This Illicit Discharge Detection and Elimination Program (IDDE) is part of Putnam Valley Central School District's (District) Stormwater Management Plan (SWMP) and was developed to ensure compliance with Municipal Separate Storm Sewer System (MS4) permit requirements outlined by the New York State Department of Environmental Conservation's (NYSDEC) 2024 State Pollutant Discharge Elimination System (SPDES) General Permit.

This IDDE Program is intended to systematically identify unauthorized discharges at the District's outfall locations, promptly determine the source, stop the discharge, and take necessary actions to prevent future unauthorized discharges into the MS4 from the source area. The 2024 SPDES General Permit defines an illicit discharge as any discharge into an MS4 that is not entirely composed of stormwater, such as non-permitted sanitary sewage, garage drain effluent, and waste motor oil. Exceptions include non-stormwater discharges through outfalls, which are listed in Part 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (NYCRR) Part 750-1.2(a)(29)(vi) and 40 CFR 122.34(b)(3)(ii), provided they do not violate the Environmental Conservation Law (ECL) Section 17-0501.

If the Department or the District determines that one or more of the discharges are in violation of ECL Section 17-0501, the identified discharges are illicit and the District must eliminate such discharges by following the IDDE Program.

The Center for Watershed Protection Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assistant, October 2004 (CWP 2004) was referenced for the development of this IDDE Program.

2 ILLICIT DISCHARGE DETECTION

As part of this program, the District will designate high and low priority monitoring locations (outfalls, catch basins, septic systems, etc.), ensuring all are accessible. The District operations and maintenance staff and groundskeepers will be trained to conduct inspections of monitoring locations to confirm characteristics, document conditions, and inspect stormwater flow and receiving water bodies for any evidence of illicit discharge.

All inspections will be documented using the Monitoring Locations Inspection and Sampling Field Sheet found in Appendix B.

Annually, by April 1, the District will review and update the monitoring location inspection and sampling procedures based on monitoring location inspection results to be documented in the SWMP Plan.

2.1 MONITORING LOCATIONS RANKING AND INVENTORY

High priority monitoring locations are identified by:

i. At a high priority municipal facility, which are defined as housing
    a. Storage of chemicals, salt, petroleum, pesticides, fertilizers, anti-freeze, lead-acid batteries, tires, waste/debris;
    b. Fueling stations; and/or
    c. Vehicle or equipment maintenance/repair
ii. Discharging to impaired waters (subject to Part VIII requirements and mapped in accordance with Part IV.D.1.e.ii.c of the Permit)
iii. Discharging to waters in Class AA-S, A-S, AA, A, B, SA, or SB (mapped in accordance with Part IV.D.1.e.ii.a of the Permit)
iv. Confirmed citizen complaints on three or more separate occasions in the last twelve (12) months

The District must prioritize monitoring locations within thirty (30) days of when a monitoring location is constructed or discovered. Monitoring locations include but are not limited to outfalls, catch basins, and septic systems.

All other monitoring locations are considered low priority.

The District will maintain an inventory of monitoring locations, to be updated annually. The required inventory information and photographic documentation is to be included in the completed Monitoring Locations Inspection and Sampling Field Sheet found on Appendix B of the District's SWMP.

2.2 MONITORING LOCATIONS INSPECTION

The District will conduct one inspection of each monitoring location, during dry weather, and *every five (5) years* following the most recent inspection. The goal of the inspection is to check for evidence of past or on-going illicit discharges. The primary field screening tool is the Outfall Reconnaissance Inventory (ORI), which is a stream walk designed to develop a systematic map of the District, outfall inventory, find and correct continuous and intermittent discharges without in-depth laboratory analysis.

Inspector will conduct an ORI by walking all streams and channels to find outfalls and nearby catch basins, photograph them, and record observations, including ID and location, using the Monitoring Locations Inspection and Sampling Field Sheet found on Appendix B of the District's SWMP. A separate ORI field sheet should be completed for each monitoring location. If dry weather flow occurs at the outfall, additional flow and water quality data will also be collected.

The ORI should be updated annually, if necessary, to reflect field observations, crew experience, new or modified indicators and any other conditions and factors.

2.3 SAMPLING PROVISIONS

Inspectors may occasionally encounter an obvious illicit discharge, typically identified by high turbidity, odors, floatable and unusual colors. In other instances, Inspector may encounter a transitory discharge, such as a liquid or oil spill that should be immediately referred to the appropriate agency for cleanup.

As defined by the SPDES, an obvious illicit discharge is an illicit discharge from a flowing MS4 outfall that does not require sample collection for confirmation. This characterization is referenced by a suspect illicit discharge, on the other hand, is an illicit discharge from flowing monitoring locations with high severity (score of 3) on one or more physical indicators based on the relative severity index of physical indicators for flowing outfalls only. This characterization is referenced by Section 4 of the Monitoring Locations Inspection and Sampling Field Sheet, completed during monitoring locations inspection.

Sampling will be conducted for all monitoring locations which had inspections which resulted in a suspect or obvious illicit discharge characterization. If the source of the illicit discharge is clear and discernable (e.g., sewage), however, sampling is not necessary.

When obvious and/or suspect illicit discharges are encountered, field crews should photograph the discharge, record observations and notify the Program Coordinator and the District's environmental consultant.

3 ILLICIT DISCHARGE TRACK DOWN

Once an illicit discharge has been identified, track down procedures will be conducted to trace the source of the discharge and the responsible party. A combination of methods can be used to isolate the specific source, including but not limited to review of maps, historic plans and following systemic procedures.

All instances of illicit discharge will be properly documented and reported in the District's Storm Water Management Plan and annual report.

3.1 STORM DRAIN NETWORK INVESTIGATION

This method involves strategically inspecting manholes within the storm drain network system to measure chemical or physical indicators that can isolate discharges to a specific segment of the network. Once the pipe segment has been identified, on-site investigations are used to find the specific discharge or improper connection.

A key decision when conducting a storm drain network investigation is where to start sampling in the network, which include following the discharge up the network, splitting the network into segments, or moving down the storm drain.

Intermittent discharges, however, are often challenging to trace in the storm drain network, although four techniques can be used with some success. Methods include sandbagging, Optical Brightener Monitoring (OBM) traps, automatic samplers and observing for deposits or stains.

3.2 DRAINAGE AREA INVESTIGATION

The source of some illicit discharges can be determined through a survey or analysis of the drainage area of the problem area. The simplest approach is a rapid windshield survey of the drainage area to find the potential discharger or generating sites.

Field crews, already familiar with the District's business operations, try to match the characteristics of the discharge to the most likely type of generating site, and then inspect all of the sites of the same type within the drainage area until the culprit is found. For example, if fuel is observed at an outfall, crews might quickly check every business operation in the catchment that stores or dispenses fuel.

Drainage area investigations are only effective if the discharge observed has distinct or unique characteristics that allow crews to quickly ascertain the probable operation or business that is generating it.

3.3 ON-SITE INVESTIGATIONS

On-site investigations are used to pinpoint the exact source or connection producing a discharge within the storm drain network. The three basic approaches are:

- Dye testing;
- Video testing; and
- Smoke testing

It should be noted that on-site investigations are not particularly effective in finding indirect discharges to the storm drain network.

3.4 SEPTIC SYSTEM INVESTIGATIONS

Many illicit discharges enter water bodies as illicit discharges. On-site septic investigations can be performed in conjunction with surface condition analysis to determine if the septic system is failing. Some key surface conditions to analyze include:

- Foul odors in the yard
- Wet, spongy ground
- Lush plant growth
- Shrubs or trees with root damage within 10 feet of the system
- Algal blooms or excessive weed growth in adjacent ditches, ponds and stream

3.5 TIMEFRAME TO INITIATE PROCEDURES

Within two (2) hours of discovery, the District must initiate track down procedures for obvious illicit discharges of sanitary wastewater that would affect bathing areas during bathing season, shell fishing areas, or public water intakes and report orally or electronically to the Regional Water Engineer and local health department.

Within twenty-four (24) hours of discovery, the District must initiate track down procedures for flowing monitoring locations with obvious illicit discharges.

Within five (5) days of discovery, the District must initiate track down procedures for suspect illicit discharges.

4 ILLICIT DISCHARGE ELIMINATION

Once the source of an illicit discharge has been identified, the District will initiate elimination procedures under guidance from its environmental consultant. The elimination procedures are consistent with the Enforcement Response Plan (ERP) and provide provisions for escalating enforcement and corrective actions, if needed.

The District will inform the public about any work to be performed to eliminate the identified illicit discharge(s). For each identified illicit discharge, the status of removal activities will be reported in the annual report and included in the SWMP Plan.

4.1 TIMEFRAME TO INITIATE PROCEDURES

Within twenty-four (24) hours of identification of an illicit discharge that has a reasonable likelihood of adversely affecting human health or the environment, the District must eliminate the illicit discharge.

Within five (5) days of identification of an illicit discharge that does not have a reasonable likelihood of adversely affecting human health or the environment, the District must eliminate the illicit discharge.

Where elimination of an illicit discharge within the specified timeframes is not possible, the District must notify the Regional Water Engineer.

5 PREVENTING ILLICIT DISCHARGES

The best way to manage these discharges is through preventive practices, which include outreach and education. Some of the more effective practices include:

Illicit Discharge Prevention Practices	
Practice	Description
Storm Drain Stenciling	• Sends a clear message to keep trash and debris, leaf litter, and pollutants out of the storm drain system, and may deter illegal dumping and discharges • Excellent way to involve the public • Few trained volunteers can stencil all storm drains in a short time • Relatively inexpensive
Used Motor Oil Collection Services	• Distribute outreach materials and educational newsletters • Store and dispose of used oil in appropriate containers with secondary containment, if needed • Enforced through methods detailed in the Enforcement Response Plan
Hazardous Waste Collection Services	• Distribute outreach materials and educational newsletters • Store and dispose of hazardous waste in appropriate containers with secondary containment, if needed • Enforced through methods detailed in the Enforcement Response Plan
Routine Sewer and Storm Drain Maintenance	• Frequent cleaning to keep trash, debris and illegally dumped material from entering the storm drain system • Historical data reviews of past complaints, or aging sewer infrastructure can be used to identify likely problem areas
Septic System Maintenance	• Distribute outreach materials and educational newsletters • Mandatory inspections • Provisions for staff training

6 ENFORCEMENT RESPONSE PLAN

The District has developed and implemented an Enforcement Response Plan (ERP) which sets forth a protocol to address repeat and continuing violations through progressively stricter responses as needed to achieve compliance with the terms and conditions of the SPDES General Permit. Non-traditional MS4 Operators do not hold the legal authority to pass local laws and ordinances and have no land use control capabilities. Instead, the District has developed a set of written policies/procedures with content equivalent to model local laws to address violations of the District's SWMP. For detailed information regarding the ERP's provisions for escalating enforcement and tracking, and provisions to confirm corrective actions have been taken, refer to Appendix C of the SWMP Plan.

7 STAFF TRAINING

If new staff are added, training on the District's IDDE Procedures must be given prior to conducting identification, track down and/or elimination procedures.

For existing staff, training on the District's IDDE Procedures must be given prior to conducting identification, track down and/or elimination procedures and once every five (5) years thereafter.

If the IDDE Procedures are updated, training on the updates must be given to all staff prior to conducting track down and/or elimination procedures.

Illicit Discharge Detection and Elimination

EMPLOYEE TRAINING RECORD FORM

Name	Title	E-Mail	Phone	Signature

Trainer (Print): _____ Date: _____

Sign: _____

Illicit Discharge Detection and Elimination

MONITORING LOCATIONS INVENTORY AND RANKING

No.	Monitoring Location	Monitoring Location ID	Receiving Waterbody	Waterbody Class	Priority
1	Outfall		Peekskill Hollow Creek	C(TS)	Low
2	Outfall		Peekskill Hollow Creek	C(TS)	Low
3	Outfall		Peekskill Hollow Creek	C(TS)	Low
4	Outfall		Peekskill Hollow Creek	C(TS)	Low
5	Outfall		Peekskill Hollow Creek	C(TS)	Low
6	Outfall		Peekskill Hollow Creek	C(TS)	Low
7	Outfall		Peekskill Hollow Creek	C(TS)	Low
10	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
11	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
12	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
13	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
14	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
15	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
16	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
17	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
18	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
19	Catch Basin		Peekskill Hollow Creek	C(TS)	Low

20	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
No.	Monitoring Location	Monitoring Location ID	Receiving Waterbody	Waterbody Class	Priority
21	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
22	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
23	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
24	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
25	Catch Basin		Peekskill Hollow Creek	C(TS)	Low
26	Catch Basin		Peekskill Hollow Creek	C(TS)	Low