

Standard Operating Procedures <i>Town of Dracut</i> <i>Department of Public Works</i> Wet Weather Outfall Inspection Approved by: The Stormwater Committee	SOP Number: 11	Issue Date: June 30, 2019
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Purpose

Outfalls from an engineered storm drain system can be in the form of pipes or ditches. Water quality inspections under dry weather and wet weather conditions must be documented to comply with current regulations. Wet weather inspection aims to describe and evaluate the first flush of stormwater discharged from an outfall during a storm, representing the maximum pollutant load managed by receiving water.

Definition of Wet Weather

A storm is considered a representative wet weather event if greater than 0.1 inch of rain falls and occurs at least 72 hours after the previously measurable (greater than 0.1 inch of rainfall) storm event. In some watersheds, based on the amount of impervious surface present, increased discharge from an outfall may not result from 0.1 inch of rain.

Ideally, the evaluation and any samples collected should occur within the first 30 minutes of discharge to reflect the first flush or maximum pollutant load.

A wet weather inspection should be scheduled when weather forecasts show a 40% chance of rain or greater. Coordination with the laboratory for bottleware and for sample drop-off needs to occur in the event that a sample is collected.

Visual Condition Assessment

The Wet Weather Outfall Inspection Form should be used to document observations related to the quality of stormwater conveyed by the structure. Observations such as the following can indicate sources of pollution within the storm drain system:

- Oil sheen
- Discoloration
- Trash and debris

For any visual observation of pollution in a stormwater outfall discharge, an investigation into the pollution source should occur, but the following are often true:

1. Foam: indicator of upstream vehicle washing activities, or an illicit discharge.
2. Oil sheen: result of a leak or spill.
3. Cloudiness: indicator of suspended solids such as dust, ash, powdered chemicals and ground up materials.
4. Color or odor: Indicator of raw materials, chemicals, or sewage.
5. Excessive sediment: indicator of disturbed earth or other unpaved areas lacking adequate erosion control measures.
6. Sanitary waste and optical enhancers (fluorescent dyes added to laundry detergent): indicators of illicit discharge.
7. Orange staining: indicator of high mineral concentrations.

Many of these observations are indicators of an illicit discharge. Illicit discharges can include: cross-connections of sewer services to engineered storm drain systems; leaking septic systems; intentional discharge of pollutants to catch basins; combined sewer overflows; connected floor drains; and sump pumps connected to the system (under some circumstances).

Although many of the observations are indicators of illicit discharge it should be noted that several of these indicators may also occur naturally. Orange staining may be the result of naturally occurring iron, and thus unrelated to pollution. Foam can be formed when the physical characteristics of water are altered by the presence of organic materials. Foam is typically found in waters with high organic content such as bog lakes, streams that originate from bog lakes, productive lakes, wetlands, or woody areas. To determine the difference between natural foam and foam caused by pollution, the following is considered.

1. Wind direction or turbulence: natural foam occurrences on the beach coincide with onshore winds. Often, foam can be found along a shoreline and/or on open waters during windy days. Natural occurrences in rivers can be found downstream of a turbulent site.
2. Proximity to a potential pollution source: some entities including the textile industry, paper production facilities, oil industries, and firefighting activities work with materials that cause foaming in water. If these materials are released to a water body in large quantities, they can cause foaming. Also, the presence of silt in water, such as from a construction site can cause foam.
3. Feeling: natural foam is typically persistent, light, and not slimy to the touch.
4. Presence of decomposing plants or organic material in the water.

Both bacteria and petroleum can create a sheen on the water surface. The source of the sheen can be differentiated by disturbing it, such as with a pole. A sheen caused by oil will remain intact and move in a swirl pattern; a sheen caused by bacteria will separate and appear “blocky”. Bacterial or naturally occurring sheens are usually silver or relatively dull in color and will break up into a number of small patches of sheen. The cause may be presence of iron, decomposition of organic material or presence of certain bacteria. Bacterial sheen is not a pollutant but should be noted.

Optical enhancers, fluorescent dyes added to laundry detergent, are typically detected through the use of clean, white cotton pads placed within the discharge for several days, dried then viewed under a UV light. If the cotton pad displays fluorescent patches, optical enhancers are present. Optical enhancers are occasionally visible as a bluish-purple haze on the water surface; however the testing method should be used to confirm the presence of optical enhancers. The inspector shall indicate the presence of a specific water quality indicator or parameter on the wet weather outfall inspection form.

Provide additional information with regard to recorded precipitation totals, or more detailed descriptions of observations made during the inspection and corrective actions taken within the comments section.

Measuring Water Quality

Based on the results of the Visual Condition Assessment, it may be necessary to collect additional data about water quality. Water quality samples can be collected with the use of field test kits or by discrete analytical samples processed by a laboratory.

The Wet Weather Outfall Inspection Form includes fields to document the results of such screening. The Inspection Form also provides values for what can be considered an appropriate benchmark for a variety of parameters that can be evaluated with field test kits.

If the results of screening using field test kits indicate that the outfall's water quality exceeds the benchmarks provided, collection of discrete analytical samples should be considered.

Analytical Sample Collection

Sample collection methods may vary based on specific outfall limitations but shall follow test procedures outlined in 40 CFR 136. A discrete manual or grab sample can classify water at a distinct point in time. These samples are easily collected and used primarily when the water quality of the discharge is expected to be homogeneous, or unchanging, in nature. A flow-weighted composite sample will classify water quality over a measured period of time. These samples are used when the water quality of the discharge is expected to be heterogeneous, or fluctuating, in nature. Grab samples are more common for wet weather outfall inspections due to the time-sensitive nature of the process.

Protocols for collecting a grab sample shall include the following:

1. Do not eat, drink or smoke during sample collection and processing.
2. Do not collect or process samples near a running vehicle.
3. Do not park vehicles in the immediate sample collection area, including both running and non-running vehicles.
4. Always wear clean, powder-free nitrile gloves when handling sample containers and lids.
5. Never touch the inside surface of a sample container or lid, even with gloved hands.
6. Never allow the inner surface of a sample container or lid to be contacted by any material other than the sample water.
7. Collect samples while facing upstream and so as not to disturb water or sediments in the outfall pipe or ditch.
8. Do not overfill sample containers, and do not dump out any liquid in them. Liquids are often added to sample containers intentionally by the analytical laboratory as a preservative or for pH adjustment.
9. Slowly lower the bottle into the water to avoid bottom disturbance and stirring up sediment.
10. Do not allow any object or material to fall into or contact the collected water sample.
11. Do not allow rainwater to drip from rain gear or other surfaces into sample containers.
12. Replace and tighten sample container lids immediately after sample collection.
13. Accurately label the sample with the time and location.
14. Document on the Wet Weather Outfall Inspection Form that analytical samples were collected, specify parameters, and note the sample time on the Inspection Form. This creates a reference point for samples.

Analytical Sample Quality Control and Assurance

Upon completion of successful sample collection, the samples must be sent or delivered to a MassDEP-approved laboratory for analytical testing. Quality control and assurance are important to ensuring accurate analytical test results.

Sample preservation is required to prevent contaminant degradation between sampling and analysis and should be completed in accordance with 40 CFR 136.3.

Maximum acceptable holding times are also specified for each analytical method in 40 CFR 136.3. Holding time is defined as the period of time between sample collection and extraction for analysis of the sample at the laboratory. Holding time is important because prompt laboratory analysis allows the laboratory to review the data and if analytical problems are found, re-analyze the affected samples within the holding times.

Chain of custody forms are designed to provide sample submittal information and document transfers of sample custody. The forms are typically provided by the laboratory and must be completed by the field sampling personnel for each sample submitted to the lab for analysis. The document must be signed by both the person releasing the sample and the person receiving the sample every time the sample changes hands. The sampling personnel shall keep one copy of the form and send the remaining copies to the laboratory with the samples. Custody seals, which are dated, signed and affixed to the sample container, may be used if the samples are shipped in a cooler via courier or commercial overnight shipping.

Attachments

1. Wet Weather Outfall Inspection Form

WET WEATHER OUTFALL INSPECTION FORM

Outfall ID: _____ Town: _____ Date: _____
 Inspector: _____ Street name: _____ Last rain event: _____

Visual Inspection:	Yes	No	Comments (Include probable source of observed contamination):
Color	<input type="checkbox"/>	<input type="checkbox"/>	
Odor	<input type="checkbox"/>	<input type="checkbox"/>	
Turbidity	<input type="checkbox"/>	<input type="checkbox"/>	
Excessive Sediment	<input type="checkbox"/>	<input type="checkbox"/>	
Sanitary Waste	<input type="checkbox"/>	<input type="checkbox"/>	
Pet Waste	<input type="checkbox"/>	<input type="checkbox"/>	
Floatable Solids	<input type="checkbox"/>	<input type="checkbox"/>	
Oil Sheen	<input type="checkbox"/>	<input type="checkbox"/>	
Bacterial Sheen	<input type="checkbox"/>	<input type="checkbox"/>	
Foam	<input type="checkbox"/>	<input type="checkbox"/>	
Algae	<input type="checkbox"/>	<input type="checkbox"/>	
Orange Staining	<input type="checkbox"/>	<input type="checkbox"/>	
Excessive Vegetation	<input type="checkbox"/>	<input type="checkbox"/>	
Optical Enhancers	<input type="checkbox"/>	<input type="checkbox"/>	
Other _____			

Sample Parameters	Analytical Test Method	Benchmark*	Field Screening Result	Full Analytical?
Ammonia ¹	EPA 350.2/SM4500-NH3C	>50.0 mg/L		<input type="checkbox"/> Yes <input type="checkbox"/> No
Specific Conductance ¹	SM 2510B	>2,000		<input type="checkbox"/> Yes <input type="checkbox"/> No
Detergents & Surfactants ²	EPA 425.1/SM5540C	> 0.25 mg/L		<input type="checkbox"/> Yes <input type="checkbox"/> No
Fluoride ²	EPA 300.0	>0.25 mg/L		<input type="checkbox"/> Yes <input type="checkbox"/> No
pH ¹	EPA 150.1/SM 4500H	<5		<input type="checkbox"/> Yes <input type="checkbox"/> No
Potassium ¹	EPA 200.7	>20 mg/L		<input type="checkbox"/> Yes <input type="checkbox"/> No

Comments:

¹ – *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*, Center for Watershed Protection and Robert Pitt of University of Alabama, 2004, p. 134, Table 45.

² – *Appendix I – Field Measurements, Benchmarks and Instrumentation*, Draft Massachusetts North Coastal Small MS4 General Permit, 2009.