## FIFTH INTERNATIONAL CONFERENCE ON URBAN STORM DRAINAGE

# U.S. EPA'S MANUAL OF PRACTICE FOR THE INVESTIGATION AND CONTROL OF CROSS-CONNECTION POLLUTION INTO STORM DRAINAGE SYSTEMS

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ABSTRACT: Dry-weather flows discharging from storm drainage systems can contribute significant pollutant loadings to receiving waters. If these loadings are ignored, little improvement in receiving water conditions may occur with many stormwater control programs. This paper summarizes the first phase of an EPA sponsored research project to develop a manual to investigate these connections.

KEY WORDS: Cross-connections; Stormwater; Dry-weather Flow; Manual of Practice

## 1. INTRODUCTION

This paper is a summary of the first phase of a current EPA research project to develop investigative techniques to assist local governments in identifying the magnitude and sources of cross-connections in their storm drainage systems.

Discharges from storm drainage outfalls can be a combination of dry-weather base flows; stormwater runoff; snowmelt water; intermittent discharges of debris, washwaters, and other waste materials into storm drains; and the relatively continuous discharges of sanitary and industrial cross-connected wastewaters. These discharges include stormwater that contains the washoff of pollutants from all land surfaces during rains, including washoff of pollutants from areas such as industrial material and waste storage areas, gas station service areas, parking lots, and other industrial and commercial areas, etc. Therefore, the quality of urban runoff can vary greatly with time (dry versus wet-weather, cold versus warm weather, etc.) and location.

The discharge of sanitary and industrial wastes into storm drainage (cross-connections) can lead to serious water pollution problems. In many cases, storm drain discharges are badly polluted by stormwater alone, without the additional pollutant loadings associated with sanitary or industrial connections. The addition of sanitary wastes increases the concentrations of organic solids and nutrients, and increases the potential of pathogenic microorganisms in the runoff. Industrial wastewaters can be highly variable, but usually increase the concentrations of many filterable heavy metals in runoff. In many cases, annual discharge loadings from stormwater outfalls can be greatly affected by dryweather discharges (Pitt and Shawley 1982; Pitt 1984; and Pitt and McLean 1986, as examples).

Dry-weather and wet-weather urban runoff flows have been monitored during many urban runoff studies that have found that discharges observed at outfalls during dry weather were significantly different from wet-weather runoff. Warm and cold weather runoff was also contrasted during some studies and was also found to be quite different. During the Castro Valley, California, Nationwide Urban Runoff Program (NURP) study, Pitt and Shawley (1982) found that the dry-weather flows were very hard and had very few nonfilterable pollutants, while the stormwater runoff was quite soft and had substantial nonfilterable metals. The dry-weather flows were found to contribute substantial quantities of many pollutants, even though the concentrations were not high. The long duration of baseflows in many areas of North America (about 95 percent of the time) off-set their lower concentrations and lower flow rates as compared to wet-weather (stormwater) flows.

The Bellevue, Washington, NURP project (Pitt and Bissonnette 1984) summarized the reported incidents of intermittent discharges and dumpings of pollutants into the local storm drainage system. During a three year period of time, about 50 citizen contacts were made to the Bellevue Storm and Surface Water Utility District concerning water

quality problems. About 25 percent of the complaints concerned oil being discharged into catchbasins. Various industrial and commercial discharges into the storm drainage system were detected. Concrete wastes flushed from concrete trucks at urban job sites were a frequently occurring problem. Cleaning establishment discharges into creeks were also a common problem. Several vehicle accidents also resulted in spillage of gasoline, diesel fuel, hydraulic fluids, and lawn care chemicals from damaged trucks that flowed into the storm drain inlets. Pitt (1984) also monitored both dry- and wet-weather discharges from stormwater outfalls in Bellevue and found significant pollutant yield contributions associated with dry-weather discharges from residential areas.

Dry-weather flows in a monitored Toronto residential area were found to have high pesticide concentrations, while a monitored industrial area had dry-weather flows that had high concentrations of organic and metallic toxicants (Pitt and McLean 1986). More than 50 percent of the annual discharges of water volume, total residue, chlorides, and bacteria, from the monitored industrial, residential, and commercial areas, were associated with dry-weather discharges. Substantial metal discharges, especially from the industrial area, were also found to be associated with dry weather.

Gartner Lee and Associates, Ltd. (GLA 1983) conducted an extensive survey of dryweather storm drainage in the Humber River watershed (Toronto) in an attempt to identify the most significant urban runoff pollutant sources. About 625 outfalls were sampled two times during dry-weather, with analyses conducted for many pollutants, including organics, solids, nutrients, metals, phenols, and bacteria. About 1/3 of the outfalls were discharging at rates greater than 1 L/sec. The dry-weather flows were found to contribute significant loadings of nutrients, phenols, and metals, compared to upstream conditions. Further investigations identified many industrial and sanitary sewage cross-connections into the storm drainage system. An apartment building with the sanitary drains from eight units illegally connected to the storm drainage system was typical of the problems found. Other problems were found in industrial areas, including fluid dripping from animal hides in tannery storage areas, and yard washdown runoff from meat packing plants.

# 2. METHODOLOGY

A specific objective of this project is to identify the most promising techniques to identify, quantify, and locate cross-connections of sanitary and industrial wastes entering storm drainage systems.

As noted above, cross-connections can take multiple forms. Many cross-connection problems are associated with intermittent discharges. These intermittent discharges occur during wet weather as runoff from storage areas, or as illegal dumping or washing operations that occur during dry or wet weather. Other cross-connection problems are caused by continuous connections that can occur during both wet and dry weather. These can be associated with "non-contact" cooling water discharges (which frequently contain a variety of chemicals, including algicides and corrosion inhibitors), other industrial wastewater connections, and sanitary sewage waste connections, for example.

This project is examining procedures that can be used to identify the significance and type of either intermittent or continuous discharges occurring during dry weather. The pollutant contributions associated with cross-connections can be distinguished by unique characteristics based on water types and typical pollutants. Knowing the specific water source for each flow component could enable the relative mixture of uncontaminated baseflow and the wastewater cross-connections to be calculated.

The following list summarizes the potential contaminated residential area crossconnection sources being investigated:

Sewage sources:

- o raw sewage from directly connected or leaky sanitary
  - sewerage
- o septage from improperly operating septic tank systems

- Household automobile maintenance:
  - o car washing runoff
  - o radiator flushing o engine de-greasing
  - o improper oil disposal

### Residential irrigation sources:

o over-watering runoff

o direct spraying of impervious surfaces

#### Roadway and other accidents:

- o fuel spills
- o spills of truck contents
- o pipeline spills

#### Other:

- o washing of ready-mix trucks
- o laundry wastes
- o improper disposal of other household toxic substances
- o dewatering of construction sites
- o sump pump discharges
- o contaminated surface and groundwaters

Commercial and industrial dry-weather discharges are being considered in a separate study conducted by Triad Engineering of Milwaukee, Wisconsin. The results of the Triad study are being incorporated into the complete EPA manual. The commercial and industrial approach is stressing differentiating industrial categories used in the industrial discharge permit program.

The natural baseflow raw water source flows, along with the sewage related sources and many industrial sources, would be relatively continuous in flow duration. The other sources would be intermittent. As a drainage area increases in size, however, the probability also increases that dry-weather discharges associated with individual intermittent activities would appear continuous at the outfall. Most of the studies referenced previously found flows at the monitored outfalls much of the time during dry weather, even though the flows were normally very low. The quality of the flows also changed dramatically at different times of the day and year for the monitored Toronto industrial outfall (Pitt and McLean 1986).

This study is identifying unique physical, biological, or chemical characteristics that would distinguish these different flow components.

The purpose of the monitoring procedures is to separate the outfalls into three general categories (with a known level of confidence) to identify which outfalls need further analyses and investigations. These categories are: (1) pathogenic or toxic pollutant sources, (2) nuisance and aquatic life threatening pollutant sources, and (3) unpolluted water sources. The pathogenic and toxic pollutant source category would be considered the most severe and could cause disease upon water contact or consumption and significant impacts on receiving water organisms. They may also cause significant water treatment problems for downstream consumers, especially for soluble metal and organic toxicants. These pollutants may originate from sanitary, commercial, and industrial wastewater cross-connections. Other residential area sources (besides sanitary wastewater), such as inappropriate household toxicant disposal, automobile engine degreasing, vehicle accident clean-up, and irrigation runoff from landscaped areas excessively treated with chemicals (fertilizers and pesticides) may also be considered in this most critical category.

Nuisance and aquatic life threatening pollutant sources can originate from residential areas and may include laundry wastes, landscaping irrigation runoff, automobile washing, construction site dewatering, and washing of ready-mix trucks. These pollutants can cause excessive algal growths, tastes and odors in downstream water supplies, and highly colored, turbid or odorous waters.

Clean water discharged through stormwater outfalls can originate from natural springs feeding urban creeks that have been converted to storm drains, infiltrating groundwater, infiltrating domestic water from water line leaks, etc.

The proposed monitoring approach is separated into three phases:

- o initial mapping effort
- o initial field surveys
- o confirmatory chemical analyses.

These three phases will be followed by detailed storm drainage and site investigations to identify specific pollutant contributors and control options.

An important requirement of the methodology is that an initial field screening effort would require minimal effort and would have little chance of missing a seriously contaminated outfall. This screening program would then be followed by a more in-depth analysis to more accurately determine the significance and source of the dry-weather pollutant discharges.

The most important step in a cross-connection investigation is in preparing and studying drainage and land use maps. The most important objective of the mapping activities would be to identify the locations of all of the stormwater outfalls. Finding the outfalls is not trivial. In the case studies examined, repeated trips typically uncovered additional outfalls that could not be located during earlier excursions. It is very difficult for communities to maintain up-to-date mapping of drainage facilities.

Another important objective of the initial mapping activities is to outline the drainage areas discharging to the outfalls. These drainage maps should identify the predevelopment streams that may have been converted to storm drains (indicating the likelihood of natural uncontaminated baseflows) and the current and past land uses. Specific land use categories to be indicated should include commercial and industrial land uses, plus other activities that may contribute runoff problems (such as land fills). Any industrial activities having significant potential of contributing flows to the storm drainage system, as indicated by Triad's analyses, need to be specifically identified and located.

Further drainage area investigations would be conducted after the outfall studies have indicated dry-weather discharge problems. These would include drainage system and industrial and commercial site studies (such as dye and smoke studies) to locate specific cross-connections.

The initial field surveys would include physical and limited chemical evaluations of outfall conditions and would be conducted to minimize "false negatives" (outfalls actually having important discharges, but falsely classified as not needing further investigation). Various physical characteristics near the outfall can provide evidence that inappropriate discharges periodically occur. However, repeated trips to the outfalls significantly increase the probability of identifying problem outfalls.

It is difficult to develop a procedure that will separate the outfalls into clear "problem" and "no problem" categories. In some of the case studies investigated, only correcting problems at the most critical outfalls resulted in insufficient receiving water quality improvements. It may be important to eventually correct all cross-connection problems throughout a city, not just the most severe problems.

Many different analytical methods are being evaluated as part of this project. The initial screening effort should include the following:

- o placement of outfall identification number;
- o outfall discharge flow estimate;
- o floatables, color, oil sheen, and odor
- characteristics of water;
- o other outfall area characteristics, such as stains, debris, damage to concrete, corrosion, unusual plant growth, or absence of plants;
- o water temperature
- o specific conductance;
- o potassium concentration;
- o ammonia concentration;
- o fluoride concentration; and
- o surfactant concentration.

These characteristics can be relatively easy to obtain at the outfall location, depending on the needed detection limits for the chemical analyses and potential interferences. Simple outfall estimates of discharge, and noting the presence of oil sheens, floatables, color, odors, etc. will probably be the most useful indicators of outfall problems. These observations will need to be repeated several times, especially if non-continuous discharges are likely. The presence of stains and structural damage will greatly assist in identifying significant non-continuous discharges.

Notably absent from the above list are pH and dissolved oxygen. These have been included in several previous cross-connection studies, but with limited value. However, in areas having known industrial sources, pH may be an important parameter that would have to be added to this list.

Specific conductance and temperature can be quickly and easily measured using a dual dedicated meter. Water color can be quantified using a comparative colorimetric meter or spectrophotometer in the field.

Fluorides can be detected using a variety of methods in the field, including field colorimetric kits having detection limits of less than 0.15 mg/L. This detection limit may not be sufficient to detect low levels of dilution with adequate precision. Dedicated specific ion meters for fluorides are available having very low detection limits (2 ug/L) that would be quite capable of detecting very small dilutions.

Detergents (or surfactants) can be detected in the field using a comparative colorimetric method (having a detection limit of 50 ug/L) or with a recently developed auto titration method in the laboratory having very few interferences and much lower detection limits.

Other ions, such as potassium and some nutrients (such as ammonia nitrogen), have been used to successfully identify sanitary sewage influence in base flows. Toxicity screening tests would be useful in areas known to have commercial or industrial activities. Some individual metals (especially copper and chromium) could also be used in areas having these land uses. In most cases, it will probably be necessary to conduct a variety of carefully selected tests because of the large number of potential pollutant sources that probably occur in most drainage areas.

This scheme should allow an efficient determination of the general category (toxic/pathogenic, nuisance, or clean) of the water being discharged. In many cases, fluorides can be used to separate untreated water from treated water sources. Untreated water sources may include discharges from natural waters or untreated industrial waters. If the treated water has no fluoride added, or if the natural water has fluoride concentrations close to treated water fluoride concentrations, then fluoride may not be an appropriate indicator. Specific conductance may also serve as a rough indicator of major water source.

Water from treated water supplies (that test positive for fluorides, or other suitable tracer) can be relatively uncontaminated (domestic water line leakage or irrigation runoff), or it may be heavily contaminated. Surfactants may be useful in determining the presence of sanitary wastewaters. Surfactants in water from treated water sources could indicate sanitary wastewaters, laundry wastes, car washing water, or other waters having detergents. If the surfactants were not present, then the treated water could be relatively uncontaminated (such as from domestic water line leaks or irrigation runoff), or it may be from rinsing ready-mix trucks or other rinsing activities (such as accident scenes). Sanitary wastewater would have the most consistent characteristics (volume and characteristic) compared to most of the other potential sources. Obviously, odor and other physical appearances (such as turbidity, foaming, color, and temperature) would be very useful in identifying sanitary wastewater.

In order to identify the specific contaminant sources in the drainage system, further detailed analyses are needed. These may include drainage system surveys (tests for specific pollutants, visual inspections, and smoke and dye tests), in-depth watershed evaluation (including aerial photographs), and industrial and commercial site studies.

## 3. CONCLUSIONS

Many urban runoff projects have found that dry-weather discharges from stormwater outfalls can contribute significant pollutant loadings. Ignoring these loadings can lead to improper conclusions concerning stormwater control requirements.

Municipalities that have recognized the importance of dry-weather flows have investigated their sources using various methods. Unfortunately, most municipalities have very large numbers of outfalls and an efficient method is needed to separate the outfalls creating the most severe problems. The most important category is for outfalls contributing pathogens or toxicants. These are most likely originating from sanitary wastewater or industrial cross-connections. An initial screening analysis at all outfalls should have a high probability of identifying all outfalls in this category. Future project phases will evaluate these outfall procedures in test conditions. Procedures to identify and correct specific cross-connections will also be summarized in these future project phases.

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