Illicit Discharge Detection and Elimination

TECHNICAL APPENDICES

by the
Center for
Watershed Protection

and
Robert Pitt
University of Alabama

October 2004

TECHNICAL APPENDICES

ILLICIT DISCHARGE DETECTION AND ELIMINATION: A GUIDANCE MANUAL FOR PROGRAM DEVELOPMENT AND TECHNICAL ASSESSMENTS

by

Edward Brown and Deb Caraco
Center for Watershed Protection
Ellicott City, Maryland 21043

and

Robert Pitt
University of Alabama
Tuscaloosa, Alabama 35487

EPA Cooperative Agreement
X-82907801-0

Project Officer

Bryan Rittenhouse
Water Permits Division
Office of Water and Wastewater
U.S. Environmental Protection Agency
Washington, D.C.

October 2004

Table of Contents

Appendix A: Generating Sites, Storm Water Regulatory Status, and Discharge Potential A-1

Appendix B: Model Illicit Discharge and Connection Ordinance B-1

Appendix C: Six Steps to Establishing a Hotline and Reporting and Tracking System C-1

Appendix D: Outfall Reconnaissance Field Sheet D-1

Appendix E: Flow Type Data from Tuscaloosa and Birmingham E-1

Appendix F: Laboratory Analytical Procedures for Outfall Monitoring F-1

Appendix G: Sampling Protocol Considerations G-1

Appendix H: Two Alternative Flow Charts H-1

Appendix I: User's Guide for the Chemical Mass Balance Model (CMBM) Version 1.0 ..... I-1

Appendix J: Using the Chemical Library to Determine the Utility of Boron as an Indicator of Illicit Discharges J-1

Appendix K: Specific Considerations for Industrial Sources of Inappropriate Pollutant Entries to the Storm Drainage System K-1

APPENDIX A

GENERATING SITES, STORM WATER REGULATORY STATUS, AND DISCHARGE POTENTIAL

The information presented in this Appendix refers to the Standard Industrial Classification (SIC) system. This system has historically been used to classify industries and other businesses for census, tax, permit and other purposes. It should be noted that, more recently, federal agencies, including EPA, have adopted the North American Industry Classification System (NAICS, pronounced "Nakes") as the industry classification system. For more information on the NAICS and how it correlates with SIC, visit http://www.census.gov/epcd/www/naics.html.

Overview

Identification of land uses that may impact water quality in local streams can be a difficult and time-consuming task. Research suggests that program managers might wish to preferentially investigate certain land uses when looking for the sources of possible pollutant loads. These land uses are all considered to be generating sites where routine operations can produce higher levels of storm water pollutants, and/or present a higher potential risk for spills, leaks or illicit discharges. There are two basic types of generating sites: *regulated hotspots* that are known sources of pollution and are subject to federal or state regulations, and *unregulated hotspots* which are operations suspected to be potential pollution sources, but which are not currently regulated.

Identifying Potential Generating Sites

The number and type of generating sites present in a subwatershed may vary greatly, and currently there is no public database available to identify all the regulated sites in a subwatershed. Instead, multiple databases need to be queried to identify generating sites that may be targets for source control or illicit discharge investigations. A three-phase approach is useful for gathering as much information as possible on generating sites within a subwatershed that may qualify for more intensive scrutiny.

Phase 1. Consult publicly available databases

The federal government has a number of databases that may help identify locations for investigation. The Environmental Protection Agency (EPA) operates two such databases. The first is the Enforcement and Compliance History Online (ECHO) database. With this system, facility compliance history can be queried and facilities can be found based on geographic location (county level), or zip code (http://www.epa.gov/echo/index.html). The other database is Envirofacts (http://www.epa.gov/enviro/). This website provides access to multiple EPA databases to provide information about environmental activities (including Resource Conservation and Recovery Act [RCRA] and Toxic Release Inventory [TRI] facilities) that may affect air, water, and land anywhere in the United States. The website also provides access to Enviromapper, which will display the location of regulated facilities.
There are also commercial databases that can provide information on regulated industries based on manufacturing or industrial SIC codes. These databases are not free, and have limitations since they are designed primarily for marketing.

Phase 2. Consult State and Local Agencies

Most states have NPDES permit programs, and track permit application to some extent. You can consult state or local regulatory agencies to obtain lists of industries that have filed NOIs (Notices of Intent) to obtain storm water permits, as well as those that have filed under TRI requirements. Other agencies that may have information on local generating sites include fire departments (for

hazardous waste), and sanitation or wastewater treatment agencies.

Phase 3. Permit Review

The final source for information is through a review of local permits. Most permit databases have SIC codes as one of the fields. These codes can be matched against the SIC codes in Table A.1 that list common generating sites under major land use headings. If a local permit database does not exist, it may be worthwhile to simply get the local phone book and do a quick look for businesses that are similar to those listed in Table A.1.

Compiling the findings from the various databases will provide an initial list of potential generating sites for future investigation. However, research has found that most of these databases can miss many of the industries that are subject to regulation (Duke *et al.*, 1999; Duke and Shaver, 1999), and further identification may be necessary. Field investigations using techniques such as the Unified Subwatershed and Site Reconnaissance (Wright *et al.*, 2004) can assist in identifying many of these generating sites that should likely be regulated by communities.

Reference Tables

This appendix is designed to assist in identifying the land uses and associated generating sites in a subwatershed where routine activities may result in pollution being discharged to the storm drain system. There are two tables provided, each of which is described below.

Table A.1 presents a listing of potential generating sites under common land uses where illicit discharges can occur based on regular activities or practices. Column one describes the general industry type. Column two lists their associated SIC codes, if known. Column three identifies whether an industry type is subject to NPDES industrial storm water permit requirements (designated by "X"). Facilities where only certain activities or facilities at the site are subject to regulation are noted (this pertains mostly to the transport-related industries). In addition, for many "light" industrial facilities, storm water permits are required only if material handling equipment or activities, raw materials, immediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water. Industries where this applies are noted with an "**". If only specific SIC codes within a major group qualify for this exception they are noted in parentheses. Municipal facilities that are subject to NPDES MS4 permit requirements are designated by "MS4." Column four identifies those businesses that can be considered an unregulated storm water hotspot (also designated by "X"). Column five looks at the illicit discharge potential of each of the businesses listed. The potential for a business to produce an illicit discharge is rated as either high (H) medium (M) or Low (L) based on the likelihood that it has a direct connection to the storm drain system (direct) or that it can produce a transitory discharge (indirect).

Table A.2 is a list of the SIC Codes that are regulated by the Industrial Multi Sector General Permit (MSGP). The list includes the four-digit SIC code level along with the official description. This table is provided for those who wish to know the full description of each SIC code that is regulated by NPDES industrial storm water permits.

Table A.1: Common Generating Sites and their Pollution Potential

Land Use Generating Site Description	Associated SIC Code(s)	Regulated Storm Water Hotspot	Unregulated Storm Water Hotspot	Illicit Discharge Potential*	
				Direct	Indirect
Commercial					
Animal Care Services	0742, 0752		X	L	L
Auto Repair	7532-7539, 7549		X	M	M
Automobile Parking	7521			L	M
Building Materials	5211-5251		X	L	L
Campgrounds/RV parks	7033		X	L	M
Car Dealers	5511-5599,		X	M	M
Car Washes	7542		X	L	L
Commercial Laundry/Dry Cleaning	7211-7219		X	L	L
Convenience Stores	5399		X	L	L
Food Stores and Wholesale Food and Beverage	5141-5149 5411-5499		X	L	M
Equipment Repair	7622-7699		X	L	L
Gasoline Stations	5541		X	M	M
Heavy Construction Equipment Rental and Leasing	7353		X	L	H
Building and Heavy Construction (For land disturbing activities)	1521-1542 1611-1629	X		L	H
Marinas	4493	X		L	M
Nurseries and garden centers	5261		X	L	M
Oil Change Shops	7549		X		M
Restaurants	5812,5813,7011		X	M	L
Swimming Pools	7997, 7999		X	L	L
Warehouses	4221-4226	X** (4221-4225)		L	L
Wholesalers of Chemical and Petroleum	5162-5169,5172		X	L	L
Industrial					
Apparel and Other Fabrics	2311–2399 3131–3199	X**		2300 L 3100 H	L M
Auto Recyclers and Scrap Yards	5015, 5093	X		L	H
Beverages and Brewing	2082-2087	X**		L	L
Boat Building and Repair	3731,3732	X		L	H
Chemical Products	2812-2899	X** (2830, 2850)		2810 H 2820 H 2840 H 2860 M 2830 L 2850 L 2870 L 2890 L	2810 L 2820 L 2840 L 2860 L 2830 L 2850 L 2870 L 2890 L

Table A.1: Common Generating Sites and their Pollution Potential					
Land Use Generating Site Description	**Associated SIC Code(s)**	**Regulated Storm Water Hotspot**	**Unregulated Storm Water Hotspot**	**Illicit Discharge Potential***	
				Direct	**Indirect**
Industrial (continued)					
Food Processing	2011–2141	X**		2010 H 2020 H 2030 H 2040 H 2050 L. 2060 L 2070 M 2090 L 2110 M	2010 L 2020 L 2030 L 2040 L 2050 L. 2060 L 2070 L 2090 L 2110 L
Garbage Truck Washout Activities	4212		X	L	H
Industrial or Commercial Machinery, Electronic Equipment	3511–3599 3612–3699	X**		L	L
Instruments; Photographic and Optical Goods, Watches and Clocks and other Miscellaneous Manufacturing	3812–3873 3933-3999	X**		L	L
Leather Tanners	3411	X		H	M
Metal Production, Plating and Engraving Operations	2514, 2522, 2542, 3312-3399, 3411-3499, 3590	X** (2514,2522, 2542, 3411-3433, 3442-3499, 3590)		H	L
Paper and Wood Products	2411-2499, 2511, 2512, 2517, 2519, 2521, 2541, 2611–2679	X** (2434, 2652–2657, 2671–2679)		2400 L 2500 L 2600 H	2400 H 2500 L 2600 H
Petroleum Storage and Refining	2911	X		2911 H	H
Printing	2711–2796	X**		L	L
Rubber and Plastics	3011-3089	X**		M	L
Stone, Glass, Clay, Cement, Concrete, and Gypsum Product	3211-3299	X** (3233)		L	L
Textile Mills	2211–2299	X**		H	L
Transportation Equipment	3711–3728, 3743-3799	X**		H	M
Institutional					
Cemeteries	6553		X	L	L
Churches	8661		X	L	L
Colleges and Universities	8221-8222		X	L	M
Corporate Office Parks			X	L	L
Hospitals	8062-8069 8071-8072		X	L	L
Private Golf Courses	7997		X	L	L
Private Schools	8211		X	L	L

Table A.1: Common Generating Sites and their Pollution Potential					
Land Use Generating Site Description	**Associated SIC Code(s)**	**Regulated Storm Water Hotspot**	**Unregulated Storm Water Hotspot**	**Illicit Discharge Potential***	
				Direct	**Indirect**
Municipal					
Composting Facilities	2875	X		L	L
Public Golf Courses	7992		X	L	L
Landfills and Hazardous Waste Material Disposal	4953, HZ, LF	X		L	H
Local Streets		MS4	X	L	H
Maintenance Depots	4173	MS4		M	H
Municipal Fleet Washing	4100	MS4		L	M
Public Works Yards		MS4		M	H
Steam Electric Plants	SE	X		L	L
Treatment Works	TW	X		L	L
Transport Related (NPDES regulation is for the portion of the facility dedicated to vehicle maintenance shops, equipment-cleaning operations, and airport deicing operations).					
Airports	4581	X		L	M
Streets and Highways Construction	1611, 1622	X		L	H
Ports	4449, 4499	X		L	H
Railroads	4011, 4013	X		L	H
Rental Car Lots	7513-7519	X		L	M
US Postal Service	4311	X		L	M
Trucking Companies and Distribution Centers	4212-4215, 4231	X		L	M
Petroleum Bulk Stations or Terminals	5171	X		L	H

*Adapted from Pitt (2001)
** Generating sites where storm water permits are required only if material handling equipment or activities, raw materials, immediate products, final products, waste materials, by-products, or industrial machinery are exposed to storm water.

Table A.2: SIC and Activity Codes for EPA's Multi-Sector General Permit for Industrial Activity	
Sector A. Timber Products	
2411	Log Storage and Handling
2421	General Sawmills and Planning Mills
2426	Hardwood Dimension and Flooring Mills
2429	Special Product Sawmills, Not Elsewhere Classified
2431–2439	Millwork, Veneer, Plywood, and Structural Wood (except 2434)
2448, 2449	Wood Containers
2451, 2452	Wood Buildings and Mobile Homes
2491	Wood Preserving
2493	Reconstituted Wood Products
2499	Wood Products, Not Elsewhere Classified
Sector B. Paper and Allied Products Manufacturing	
2611	Pulp Mills
2621	Paper Mills
2631	Paperboard Mills
2652–2657	Paperboard Containers and Boxes
2671–2679	Converted Paper and Paperboard Products, Except Containers and Boxes
Sector C. Chemical and Allied Products Manufacturing	
2812–2819	Industrial Inorganic Chemicals
2821–2824	Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and Other Manmade Fibers Except Glass
2833–2836	Medicinal chemicals and botanical products; pharmaceutical preparations; invitro and invivo diagnostic substances; biological products, except diagnostic substances
2841–2844	Soaps, Detergents, Cleaning Preparations; Perfumes, Cosmetics, Other Toilet
2851	Preparations
2861–2869	Paints, Varnishes, Lacquers, Enamels, and Allied Products
2873–2879	Industrial Organic Chemicals
2891–2899	Agricultural Chemicals, Including Facilities that Make Fertilizer Solely from Leather Scraps and Leather Dust
3952 (limited to list)	Miscellaneous Chemical Products Inks and Paints, Including China Painting Enamels, India Ink, Drawing Ink, Platinum Paints for Burnt Wood or Leather Work, Paints for China Painting, Artist's Paints and Watercolors
Sector D. Asphalt Paving and Roofing Materials Manufacturers and Lubricant Manufacturers	
2951, 2952	Asphalt Paving and Roofing Materials
2992, 2999	Miscellaneous Products of Petroleum and Coal
Sector E. Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing	
3211	Flat Glass
3221, 3229	Glass and Glassware, Pressed or Blown
3231	Glass Products Made of Purchased Glass
3241	Hydraulic Cement
3251-3259	Structural Clay Products
3261-3269	Pottery and Related Products
3271-3275	Concrete, Gypsum and Plaster Products
3281	Cut Stone and Stone Products
3291–3292	Abrasive and Asbestos Products
3295	Minerals and Earth's, Ground, or Otherwise Treated
3296	Mineral Wool
3297	Non-Clay Refractories
3299	Nonmetallic Mineral Products, Not Elsewhere Classified

Table A.2: SIC and Activity Codes for EPA's Multi-Sector General Permit for Industrial Activity	
Sector F. Primary Metals	
3312–3317	Steel Works, Blast Furnaces, and Rolling and Finishing Mills
3321–3325	Iron and Steel Foundries
3331–3339	Primary Smelting and Refining of Nonferrous Metals
3341	Secondary Smelting and Refining of Nonferrous Metals
3351–3357	Rolling, Drawing, and Extruding of Nonferrous Metals
3363–3369	Nonferrous Foundries (Castings)
3398, 3399	Miscellaneous Primary Metal Products
Sector G. Metal Mining (Ore Mining and Dressing)	
1011	Iron Ores
1021	Copper Ores
1031	Lead and Zinc Ores
1041, 1044	Gold and Silver Ores
1061	Ferroalloy Ores, Except Vanadium
1081	Metal Mining Services
1094, 1099	Miscellaneous Metal Ores
Sector H. Coal Mines and Coal Mining-Related Facilities	
1221–1241	Coal Mines and Coal Mining-Related Facilities Sector
Sector I. Oil and Gas Extraction and Refining	
1311	Crude Petroleum and Natural Gas
1321	Natural Gas Liquids
1381–1389	Oil and Gas Field Services
2911	Petroleum refining
Sector J. Mineral Mining and Dressing	
1411	Dimension Stone
1422–1429	Crushed and Broken Stone, Including Rip Rap
1481	Nonmetallic Minerals, Except Fuels
1442, 1446	Sand and Gravel
1455, 1459	Clay, Ceramic, and Refractory Materials
1474–1479	Chemical and Fertilizer Mineral Mining
1499	Miscellaneous Nonmetallic Minerals, Except Fuels
Sector K. Hazardous Waste Treatment Storage or Disposal Facilities	
HZ	Hazardous Waste Treatment, Storage or Disposal
Sector L. Landfills and Land Application Sites	
LF	Landfills, Land Application Sites and Open Dumps
Sector M. Automobile Salvage Yards	
5015	Automobile Salvage Yards
Sector N. Scrap Recycling Facilities	
5093	Scrap Recycling Facilities
Sector O. Steam Electric Generating Facilities	
SE	Steam Electric Generating Facilities
Sector P. Land Transportation	
4011, 4013	Railroad Transportation
4111–4173	Local and Highway Passenger Transportation
4212–4231	Motor Freight Transportation and Warehousing
4311	United States Postal Service
5171	Petroleum Bulk Stations and Terminals
Sector Q. Water Transportation	
4412–4499	Water Transportation
Sector R. Ship and Boat Building or Repairing Yards	
3731, 3732	Ship and Boat Building or Repairing Yards
Sector S. Air Transportation Facilities	
4512–4581	Air Transportation Facilities

Table A.2: SIC and Activity Codes for EPA's Multi-Sector General Permit for Industrial Activity	
Sector T. Treatment Works	
TW	Treatment Works
Sector U. Food and Kindred Products	
2011–2015	Meat Products
2021–2026	Dairy Products
2032	Canned, Frozen and Preserved Fruits, Vegetables and Food Specialties
2041–2048	Grain Mill Products
2051–2053	Bakery Products
2061–2068	Sugar and Confectionery Products
2074–2079	Fats and Oils
2082–2087	Beverages
2091–2099	Miscellaneous Food Preparations and Kindred Products
2111–2141	Tobacco Products
Sector V. Textile Mills, Apparel, and Other Fabric Product Manufacturing	
2211–2299	Textile Mill Products
2311–2399	Apparel and Other Finished Products Made From Fabrics and Similar Materials
3131–3199	Leather Products (except 3111)
Sector W. Furniture and Fixtures	
2511–2599	Furniture and Fixtures
2434	Wood Kitchen Cabinets
Sector X. Printing and Publishing	
2711–2796	Printing, Publishing and Allied Industries
Sector Y. Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries	
3011	Tires and Inner Tubes
3021	Rubber and Plastics Footwear
3052, 3053	Gaskets, Packing, and Sealing Devices and Rubber and Plastics Hose and Belting
3061, 3069	Fabricated Rubber Products, Not Elsewhere Classified
3081–3089	Miscellaneous Plastics Products
3931	Musical Instruments
3942–3949	Dolls, Toys, Games and Sporting and Athletic Goods
3951–3955	Pens, Pencils, and Other Artists' Materials (except 3952)
3961, 3965	Costume Jewelry and Novelties, Buttons, and Miscellaneous Notions, Except Precious Metal
3991–3999	Miscellaneous Manufacturing Industries
Sector Z. Leather Tanning and Finishing	
3111	Leather Tanning and Finishing
Sector AA. Fabricated Metal Products	
3411–3499	Fabricated Metal Products, Except Machinery and Transportation Equipment and Cutting, Engraving and Allied Services
3911–3915	Jewelry, Silverware, and Plated Ware
3479	Coating, Engraving, and Allied Services
Sector AB. Transportation Equipment, Industrial or Commercial Machinery	
3511–3599	Industrial and Commercial Machinery (except 3571–3579)
3711–3799	Transportation Equipment (except 3731, 3732)
Sector AC. Electronic, Electrical, Photographic and Optical Goods	
3612–3699	Electronic, Electrical Equipment and Components, Except Computer Equipment
3812–3873	Measuring, Analyzing and Controlling Instrument, Photographic/Optical Goods, Watches/Clocks
3571–3579	Computer and Office Equipment
Miscellaneous	
1521-1542	Building Construction General Contractors And Operative Builders
1611-1629	Heavy Construction Other Than Building Construction Contractors

References

Duke, D., K. Patel, and B. Masek. 1999. "Widespread Failure to Comply with U.S. Storm Water Regulations for Industry-Part I: Publicly Available Data to Estimate Number of Potentially Regulated Facilities." in *Environmental Engineering Science.* Vol. 16(4).

Duke, D. and K. Shaver. 1999. "Widespread Failure to Comply with U.S. Storm Water Regulations for Industry-Part II: Facility-Level Evaluations to Estimate Number of Regulated Facilities." in *Environmental Engineering Science.* Vol. 16(4).

Pitt, R. 2001. *Methods for Detection of Inappropriate Discharges to Storm Drainage Systems: Background Literature and Summary of Findings*. Tuscaloosa, AL.

Wright, T., C. Swann, K. Cappiella, and T. Schueler. 2004. *Unified Subwatershed and Site Reconnaissance: A User's Manual*. Center for Watershed Protection. Ellicott City, MD.

APPENDIX B

MODEL ILLICIT DISCHARGE AND CONNECTION ORDINANCE

Introduction to the Model Illicit Discharge and Connection Ordinance

The model ordinance provided in this Appendix is intended to be a tool for communities who are responsible for meeting the illicit discharge detection and correction requirements of the National Pollutant Discharge Elimination System (NPDES) regulations. This model ordinance is provided to assist communities in creating their own illicit discharge ordinances. In designing this model, an attempt was made to avoid creating too complex an ordinance, and instead to provide standard language and concepts that a good illicit discharge ordinance might contain. The language was borrowed from a number of ordinances.

Feel free to use and alter any and all portions of this document to meet the needs of the local community. Throughout the ordinance, there are sections in which the name of the agency to which regulatory power over illicit discharges has been given should be filled in to customize it. These sections are denoted by text placed in brackets – [authorized enforcement agency].

Italicized text with this symbol should be interpreted as comments, instructions, or information to assist local governments in tailoring the ordinance. This text would not appear in a final adopted ordinance.
This ordinance should not be construed as an exhaustive listing of all the language needed for a local ordinance, but represents a good base that communities can build upon and customize to be consistent with the staff resources available in their locality. It is recommended that this document be used in conjunction with other sources, such as existing ordinances created by other IDDE programs in the same geographic region and with similar objectives. In addition, several state agencies, councils of governments, and other regional groups have developed model ordinances. Two very comprehensive yet different examples of ordinances are:

- Model Storm Water Ordinance
  Source: North Central Texas Council of Governments
  (www.dfwstormwater.com/illicits)

- Model Illicit Discharge and Illegal Connection Ordinance
  Source: Metropolitan North Georgia Water Planning District
  (www.northgeorgiawater.com)

For those areas where septic systems are commonly used for wastewater treatment, language requiring inspection of these systems should also be added. The Washtenaw County (MI) *Regulation for the Inspection of Residential On-site Water and Sewage Disposal Systems at Time of Property Transfer* is an example of an ordinance that specifies requirements for inspection and maintenance of septic systems.

MODEL ILLICIT DISCHARGE AND CONNECTION ORDINANCE

ORDINANCE NO. _____

SECTION 1. PURPOSE/INTENT.

The purpose of this ordinance is to provide for the health, safety, and general welfare of the citizens of **[jurisdiction]** through the regulation of non-storm water discharges to the storm drainage system to the maximum extent practicable as required by federal and state law. This ordinance establishes methods for controlling the introduction of pollutants into the municipal separate storm sewer system (MS4) in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process. The objectives of this ordinance are:

(1) To regulate the contribution of pollutants to the MS4 by storm water discharges by any user.

(2) To prohibit illicit connections and discharges to the MS4.

(3) To establish legal authority to carry out all inspection, surveillance, monitoring, and enforcement procedures necessary to ensure compliance with this ordinance.

SECTION 2. DEFINITIONS.

For the purposes of this ordinance, the following shall mean:

Authorized Enforcement Agency. Employees or designees of the director of the municipal agency designated to enforce this ordinance.

Best Management Practices (BMPs). Schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants directly or indirectly to storm water, receiving waters, or storm water conveyance systems. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials storage.

Clean Water Act. The federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.), and any subsequent amendments thereto.

Construction Activity. Activities subject to NPDES Construction Permits. These include construction projects resulting in land disturbance of one acre or more. Such activities include but are not limited to clearing and grubbing, grading, excavating, and demolition.

Hazardous Materials. Any material, including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Illegal Discharge. Any direct or indirect non-storm water discharge to the storm drain system, except as exempted in Section 8 of this ordinance.

Illicit Connections. An illicit connection is defined as either of the following:

- Any drain or conveyance, whether on the surface or subsurface that allows an illegal discharge to enter the storm drain system including but not limited to any conveyances that allow any non-storm water discharge including sewage, process wastewater, and wash water to enter the storm drain system and any connections to the storm drain system from indoor drains and sinks, regardless of whether said drain or connection had been previously allowed, permitted, or approved by an authorized enforcement agency or,
- Any drain or conveyance connected from a commercial or industrial land use to the storm drain system that has not been documented in plans, maps, or equivalent records and approved by an authorized enforcement agency.

Industrial Activity. Activities subject to NPDES Industrial Storm Water Permits as defined in 40 CFR, Section 122.26 (b)(14).

Municipal Separate Storm Sewer System (MS4). The system of conveyances (including sidewalks, roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) owned and operated by the **[jurisdiction]** and designed or used for collecting or conveying storm water, and that is not used for collecting or conveying sewage.

National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit. means a permit issued by EPA (or by a State under authority delegated pursuant to 33 USC § 1342(b)) that authorizes the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

Non-Storm Water Discharge. Any discharge to the storm drain system that is not composed entirely of storm water.

Person. Any individual, association, organization, partnership, firm, corporation or other entity recognized by law and acting as either the owner or as the owner's agent.

Pollutant. Anything which causes or contributes to pollution. Pollutants may include, but are not limited to: paints, varnishes, and solvents; oil and other automotive fluids; non-hazardous liquid and solid wastes and yard wastes; refuse, rubbish, garbage, litter, or other discarded or abandoned objects, ordinances, and accumulations, so that same may cause or contribute to pollution; floatables; pesticides, herbicides, and fertilizers; hazardous substances and wastes; sewage, fecal coliform and pathogens; dissolved and particulate metals; animal wastes; wastes and residues that result from constructing a building or structure; and noxious or offensive matter of any kind.

Premises. Any building, lot, parcel of land, or portion of land whether improved or unimproved including adjacent sidewalks and parking strips.

Storm Drainage System. Publicly-owned facilities by which storm water is collected and/or conveyed, including but not limited to any roads with drainage systems, municipal streets, gutters, curbs, inlets, piped storm drains, pumping facilities, retention and detention basins, natural and human-made or altered drainage channels, reservoirs, and other drainage structures.

Storm Water. Any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

Storm Water Management Plan. A document which describes the Best Management Practices and activities to be implemented by a person or business to identify sources of pollution or contamination at a site and the actions to eliminate or reduce pollutant discharges to Storm Water, Storm Water Conveyance Systems, and/or Receiving Waters to the Maximum Extent Practicable.

Wastewater. Any water or other liquid, other than uncontaminated storm water, discharged from a facility.

SECTION 3. APPLICABILITY.

This ordinance shall apply to all water entering the storm drain system generated on any developed and undeveloped lands unless explicitly exempted by the **[authorized enforcement agency]**.

SECTION 4. RESPONSIBILITY FOR ADMINISTRATION.

The **[authorized enforcement agency]** shall administer, implement, and enforce the provisions of this ordinance. Any powers granted or duties imposed upon the **[authorized enforcement agency]** may be delegated in writing by the Director of the **[authorized enforcement agency]** to persons or entities acting in the beneficial interest of or in the employ of the agency.

SECTION 5. COMPATIBILITY WITH OTHER REGULATIONS.

This ordinance is not intended to modify or repeal any other ordinance, rule, regulation, or other provision of law. The requirements of this ordinance are in addition to the requirements of any other ordinance, rule, regulation, or other provision of law, and where any provision of this ordinance imposes restrictions different from those imposed by any other ordinance, rule, regulation, or other provision of law, whichever provision is more restrictive or imposes higher protective standards for human health or the environment shall control.

SECTION 6. SEVERABILITY.

The provisions of this ordinance are hereby declared to be severable. If any provision, clause, sentence, or paragraph of this ordinance or the application thereof to any person, establishment, or circumstances shall be held invalid, such invalidity shall not affect the other provisions or application of this ordinance.

SECTION 7. ULTIMATE RESPONSIBILITY.

The standards set forth herein and promulgated pursuant to this ordinance are minimum standards; therefore this ordinance does not intend or imply that compliance by any person will ensure that there will be no contamination, pollution, or unauthorized discharge of pollutants.

SECTION 8. DISCHARGE PROHIBITIONS.

8.1. Prohibition of Illegal Discharges.

No person shall throw, drain, or otherwise discharge, cause, or allow others under its control to throw, drain, or otherwise discharge into the MS4 any pollutants or waters containing any pollutants, other than storm water.

The commencement, conduct or continuance of any illegal discharge to the storm drain system is prohibited except as described as follows:

(1) The following discharges are exempt from discharge prohibitions established by this ordinance: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration, uncontaminated pumped ground water, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, and street wash water.

(2) Discharges or flow from firefighting, and other discharges specified in writing by the **[authorized enforcement agency]** as being necessary to protect public health and safety.

(3) Discharges associated with dye testing, however this activity requires a verbal notification to the **[authorized enforcement agency]** prior to the time of the test.

(4) The prohibition shall not apply to any non-storm water discharge permitted under an NPDES permit, waiver, or waste discharge order issued to the discharger and administered under the authority of the United States Environmental Protection Agency (EPA), provided that the discharger is in full compliance with all requirements of the permit, waiver, or order and other applicable laws and regulations, and provided that written approval has been granted for any discharge to the storm drain system.

The local government may evaluate and remove any of the above exemptions if it is determined that they are causing an adverse impact.

8.2. Prohibition of Illicit Connections.

(1) The construction, use, maintenance or continued existence of illicit connections to the storm drain system is prohibited.

(2) This prohibition expressly includes, without limitation, illicit connections made in the past, regardless of whether the connection was permissible under law or practices applicable or prevailing at the time of connection.

(3) A person is considered to be in violation of this ordinance if the person connects a line conveying sewage to the MS4, or allows such a connection to continue.

(4) Improper connections in violation of this ordinance must be disconnected and redirected, if necessary, to an approved onsite wastewater management system or the sanitary sewer system upon approval of the **[authorized enforcement agency]**.

(5) Any drain or conveyance that has not been documented in plans, maps or equivalent, and which may be connected to the storm sewer system, shall be located by the owner or occupant of that property upon receipt of written notice of violation from the **[authorized**

enforcement agency] requiring that such locating be completed. Such notice will specify a reasonable time period within which the location of the drain or conveyance is to be determined, that the drain or conveyance be identified as storm sewer, sanitary sewer or other, and that the outfall location or point of connection to the storm sewer system, sanitary sewer system or other discharge point be identified. Results of these investigations are to be documented and provided to the **[authorized enforcement agency]**.

SECTION 9. WATERCOURSE PROTECTION.

Every person owning property through which a watercourse passes, or such person's lessee, shall keep and maintain that part of the watercourse within the property free of trash, debris, excessive vegetation, and other obstacles that would pollute, contaminate, or significantly retard the flow of water through the watercourse. In addition, the owner or lessee shall maintain existing privately owned structures within or adjacent to a watercourse, so that such structures will not become a hazard to the use, function, or physical integrity of the watercourse.

SECTION 10. INDUSTRIAL OR CONSTRUCTION ACTIVITY DISCHARGES.

10.1. Submission of NOI to [jurisdiction].

(1) Any person subject to an industrial or construction activity NPDES storm water discharge permit shall comply with all provisions of such permit. Proof of compliance with said permit may be required in a form acceptable to the **[authorized enforcement agency]** prior to the allowing of discharges to the MS4.

(2) The operator of a facility, including construction sites, required to have an NPDES permit to discharge storm water associated with industrial activity shall submit a copy of the Notice of Intent (NOI) to the **[authorized enforcement agency]** at the same time the operator submits the original Notice of Intent to the EPA as applicable.

(3) The copy of the Notice of Intent may be delivered to the **[authorized enforcement agency]** either in person or by mailing it to:

Notice of Intent to Discharge Storm Water

[authorized enforcement agency]

[street address]

[city, state, zip code]

(4) A person commits an offense if the person operates a facility that is discharging storm water associated with industrial activity without having submitted a copy of the Notice of Intent to do so to the **[authorized enforcement agency]**.

SECTION 11. COMPLIANCE MONITORING

11.1. Right of Entry: Inspection and Sampling.

The **[authorized enforcement agency]** shall be permitted to enter and inspect facilities subject to regulation under this ordinance as often as may be necessary to determine compliance with this ordinance.

(1) If a discharger has security measures in force which require proper identification and clearance before entry into its premises, the discharger shall make the necessary arrangements to allow access to representatives of the **[authorized enforcement agency]**.

(2) Facility operators shall allow the **[authorized enforcement agency]** ready access to all parts of the premises for the purposes of inspection, sampling, examination and copying of records that must be kept under the conditions of an NPDES permit to discharge storm water, and the performance of any additional duties as defined by state and federal law.

(3) The **[authorized enforcement agency]** shall have the right to set up on any permitted facility such devices as are necessary in the opinion of the **[authorized enforcement agency]** to conduct monitoring and/or sampling of the facility's storm water discharge.

(4) The **[authorized enforcement agency]** has the right to require the discharger to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the discharger at its own expense. All devices used to measure storm water flow and quality shall be calibrated to ensure their accuracy.

(5) Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the operator at the written or oral request of the **[authorized enforcement agency]** and shall not be replaced. The costs of clearing such access shall be borne by the operator.

(6) Unreasonable delays in allowing the **[authorized enforcement agency]** access to a permitted facility is a violation of a storm water discharge permit and of this ordinance. A person who is the operator of a facility with an NPDES permit to discharge storm water associated with industrial activity commits an offense if the person denies the **[authorized enforcement agency]** reasonable access to the permitted facility for the purpose of conducting any activity authorized or required by this ordinance.

11.2. Search Warrants.

If the **[authorized enforcement agency]** has been refused access to any part of the premises from which storm water is discharged, and he/she is able to demonstrate probable cause to believe that there may be a violation of this ordinance, or that there is a need to inspect and/or sample as part of a routine inspection and sampling program designed to verify compliance with this ordinance or any order issued hereunder, or to protect the overall public health, safety, and welfare of the community, then the **[authorized enforcement agency]** may seek issuance of a search warrant from any court of competent jurisdiction.

SECTION 12. REQUIREMENT TO PREVENT, CONTROL, AND REDUCE STORM WATER POLLUTANTS BY THE USE OF BEST MANAGEMENT PRACTICES.

[Authorized enforcement agency] will adopt requirements identifying Best Management Practices for any activity, operation, or facility which may cause or contribute to pollution or contamination of storm water, the storm drain system, or waters of the United States. The owner or operator of such activity, operation, or facility shall provide, at their own expense, reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses through the use of these structural and non-structural BMPs. Further, any person responsible for a property or premise that is, or may be, the source of an illicit discharge, may be required to implement, at said person's expense, additional structural and non-structural BMPs to prevent the further discharge of pollutants to the MS4. Compliance with all terms and conditions of a valid NPDES permit authorizing the discharge of storm water associated with industrial activity, to the extent practicable, shall be deemed compliance with the provisions of this section. These BMPs shall be part of a storm water management plan (SWMP) as necessary for compliance with requirements of the NPDES permit.

SECTION 13. NOTIFICATION OF SPILLS.

Notwithstanding other requirements of law, as soon as any person responsible for a facility or operation, or responsible for emergency response for a facility or operation has information of any known or suspected release of materials which are resulting or may result in illegal discharges or pollutants discharging into storm water, the storm drain system, or waters of the United States, said person shall take all necessary steps to ensure the discovery, containment, and cleanup of such release. In the event of such a release of hazardous materials said person shall immediately notify emergency response agencies of the occurrence via emergency dispatch services. In the event of a release of non-hazardous materials, said person shall notify the **[authorized enforcement agency]** in person or by phone or facsimile no later than the next business day. Notifications in person or by phone shall be confirmed by written notice addressed and mailed to the **[authorized enforcement agency]** within **[___]** business days of the phone notice. If the discharge of prohibited materials emanates from a commercial or industrial establishment, the owner or operator of such establishment shall also retain an on-site written record of the discharge and the actions taken to prevent its recurrence. Such records shall be retained for at least **[___]** years.

Failure to provide notification of a release as provided above is a violation of this ordinance.

SECTION 14. VIOLATIONS, ENFORCEMENT, AND PENALTIES.

14.1. Violations.

It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this ordinance. Any person who has violated or continues to violate the provisions of this ordinance, may be subject to the enforcement actions outlined in this section or may be restrained by injunction or otherwise abated in a manner provided by law.

In the event the violation constitutes an immediate danger to public health or public safety, the **[authorized enforcement agency]** is authorized to enter upon the subject private property,

without giving prior notice, to take any and all measures necessary to abate the violation and/or restore the property. The **[authorized enforcement agency]** is authorized to seek costs of the abatement as outlined in Section 17.

14.2. Warning Notice.

When the **[authorized enforcement agency]** finds that any person has violated, or continues to violate, any provision of this ordinance, or any order issued hereunder, the **[authorized enforcement agency]** may serve upon that person a written Warning Notice, specifying the particular violation believed to have occurred and requesting the discharger to immediately investigate the matter and to seek a resolution whereby any offending discharge will cease. Investigation and/or resolution of the matter in response to the Warning Notice in no way relieves the alleged violator of liability for any violations occurring before or after receipt of the Warning Notice. Nothing in this subsection shall limit the authority of the **[authorized enforcement agency]** to take any action, including emergency action or any other enforcement action, without first issuing a Warning Notice.

14.3. Notice of Violation.

Whenever the **[authorized enforcement agency]** finds that a person has violated a prohibition or failed to meet a requirement of this ordinance, the **[authorized enforcement agency]** may order compliance by written notice of violation to the responsible person.

The Notice of Violation shall contain:

(1) The name and address of the alleged violator;

(2) The address when available or a description of the building, structure or land upon which the violation is occurring, or has occurred;

(3) A statement specifying the nature of the violation;

(4) A description of the remedial measures necessary to restore compliance with this ordinance and a time schedule for the completion of such remedial action;

(5) A statement of the penalty or penalties that shall or may be assessed against the person to whom the notice of violation is directed;

(6) A statement that the determination of violation may be appealed to the **[authorized enforcement agency]** by filing a written notice of appeal within **[___]** days of service of notice of violation; and

(7) A statement specifying that, should the violator fail to restore compliance within the established time schedule, the work will be done by a designated governmental agency or a contractor and the expense thereof shall be charged to the violator.

Such notice may require without limitation:

(1) The performance of monitoring, analyses, and reporting;

(2) The elimination of illicit connections or discharges;

(3) That violating discharges, practices, or operations shall cease and desist;

(4) The abatement or remediation of storm water pollution or contamination hazards and the

restoration of any affected property

(5) Payment of a fine to cover administrative and remediation costs; and

(6) The implementation of source control or treatment BMPs.

14.5. Compensatory Action.

In lieu of enforcement proceedings, penalties, and remedies authorized by this ordinance, the **[authorized enforcement agency]** may impose upon a violator alternative compensatory actions, such as storm drain stenciling, attendance at compliance workshops, creek cleanup, etc.

14.6. Suspension Of MS4 Access.

14.6.1. Emergency Cease and Desist Orders

When the **[authorized enforcement agency]** finds that any person has violated, or continues to violate, any provision of this ordinance, or any order issued hereunder, or that the person's past violations are likely to recur, and that the person's violation(s) has (have) caused or contributed to an actual or threatened discharge to the MS4 or waters of the United States which reasonably appears to present an imminent or substantial endangerment to the health or welfare of persons or to the environment, the **[authorized enforcement agency]** may issue an order to the violator directing it immediately to cease and desist all such violations and directing the violator to:

(1) Immediately comply with all ordinance requirements; and

(2) Take such appropriate preventive action as may be needed to properly address a continuing or threatened violation, including immediately halting operations and/or terminating the discharge.

Any person notified of an emergency order directed to it under this Subsection shall immediately comply and stop or eliminate its endangering discharge. In the event of a discharger's failure to immediately comply voluntarily with the emergency order, the **[authorized enforcement agency]** may take such steps as deemed necessary to prevent or minimize harm to the MS4 or waters of the United States, and/or endangerment to persons or to the environment, including immediate termination of a facility's water supply, sewer connection, or other municipal utility services. The **[authorized enforcement agency]** may allow the person to recommence its discharge when it has demonstrated to the satisfaction of the **[authorized enforcement agency]** that the period of endangerment has passed, unless further termination proceedings are initiated against the discharger under this ordinance. A person that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the causes of the harmful discharge and the measures taken to prevent any future occurrence, to the **[authorized enforcement agency]** within **[___]** days of receipt of the emergency order. Issuance of an emergency cease and desist order shall not be a bar against, or a prerequisite for, taking any other action against the violator.

14.6.2. Suspension due to Illicit Discharges in Emergency Situations

The **[authorized enforcement agency]** may, without prior notice, suspend MS4 discharge access to a person when such suspension is necessary to stop an actual or threatened discharge which presents or may present imminent and substantial danger to the environment, or to the health or welfare of persons, or to the MS4 or waters of the United States. If the violator fails to

comply with a suspension order issued in an emergency, the **[authorized enforcement agency]** may take such steps as deemed necessary to prevent or minimize damage to the MS4 or waters of the United States, or to minimize danger to persons.

14.6.3. Suspension due to the Detection of Illicit Discharge

Any person discharging to the MS4 in violation of this ordinance may have their MS4 access terminated if such termination would abate or reduce an illicit discharge. The **[authorized enforcement agency]** will notify a violator of the proposed termination of its MS4 access. The violator may petition the **[authorized enforcement agency]** for a reconsideration and hearing.

A person commits an offense if the person reinstates MS4 access to premises terminated pursuant to this Section, without the prior approval of the **[authorized enforcement agency]**.

14.7. Civil Penalties.

In the event the alleged violator fails to take the remedial measures set forth in the notice of violation or otherwise fails to cure the violations described therein within **[___]** days, or such greater period as the **[authorized enforcement agency]** shall deem appropriate, after the **[authorized enforcement agency]** has taken one or more of the actions described above, the **[authorized enforcement agency]** may impose a penalty not to exceed $**[___]** (depending on the severity of the violation) for each day the violation remains unremedied after receipt of the notice of violation.

14.8. Criminal Prosecution.

Any person that has violated or continues to violate this ordinance shall be liable to criminal prosecution to the fullest extent of the law, and shall be subject to a criminal penalty of $**[___]** per violation per day and/or imprisonment for a period of time not to exceed **[___]** days. Each act of violation and each day upon which any violation shall occur shall constitute a separate offense.

SECTION 15. APPEAL OF NOTICE OF VIOLATION.

Any person receiving a Notice of Violation may appeal the determination of the **[authorized enforcement agency]**. The notice of appeal must be received within **[___]** days from the date of the Notice of Violation. Hearing on the appeal before the appropriate authority or his/her designee shall take place within **[___]** days from the date of receipt of the notice of appeal. The decision of the municipal authority or their designee shall be final.

SECTION 16. ENFORCEMENT MEASURES AFTER APPEAL.

If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, or, in the event of an appeal, within **[___]** days of the decision of the municipal authority upholding the decision of the **[authorized enforcement agency]**, then representatives of the **[authorized enforcement agency]** shall enter upon the subject private property and are authorized to take any and all measures necessary to abate the violation and/or restore the property. It shall be unlawful for any person, owner, agent or person in possession of any

premises to refuse to allow the government agency or designated contractor to enter upon the premises for the purposes set forth above.

SECTION 17. COST OF ABATEMENT OF THE VIOLATION.

Within **[___]** days after abatement of the violation, the owner of the property will be notified of the cost of abatement, including administrative costs. The property owner may file a written protest objecting to the amount of the assessment within **[___]** days. If the amount due is not paid within a timely manner as determined by the decision of the municipal authority or by the expiration of the time in which to file an appeal, the charges shall become a special assessment against the property and shall constitute a lien on the property for the amount of the assessment.

Any person violating any of the provisions of this article shall become liable to the **[jurisdiction]** by reason of such violation. The liability shall be paid in not more than **[___]** equal payments. Interest at the rate of **[___]** percent per annum shall be assessed on the balance beginning on the **[___]** day following discovery of the violation.

SECTION 18. VIOLATIONS DEEMED A PUBLIC NUISANCE.

In addition to the enforcement processes and penalties provided, any condition caused or permitted to exist in violation of any of the provisions of this ordinance is a threat to public health, safety, and welfare, and is declared and deemed a nuisance, and may be summarily abated or restored at the violator's expense, and/or a civil action to abate, enjoin, or otherwise compel the cessation of such nuisance may be taken.

SECTION 19. REMEDIES NOT EXCLUSIVE.

The remedies listed in this ordinance are not exclusive of any other remedies available under any applicable federal, state or local law and it is within the discretion of the **[authorized enforcement agency]** to seek cumulative remedies.

The **[authorized enforcement agency]** may recover all attorney's fees court costs and other expenses associated with enforcement of this ordinance, including sampling and monitoring expenses.

SECTION 20. ADOPTION OF ORDINANCE.

This ordinance shall be in full force and effect **[___]** days after its final passage and adoption. All prior ordinances and parts of ordinances in conflict with this ordinance are hereby repealed.

PASSED AND ADOPTED this ____ day of _____, 20__, by the following vote:

APPENDIX C

SIX STEPS TO ESTABLISHING A HOTLINE AND REPORTING AND TRACKING SYSTEM

Introduction

A complaint hotline is a dedicated phone number or website where citizens can easily report illicit discharge and pollution concerns. A prompt investigation of each complaint by trained inspectors should always follow a reported incident, usually within 24 hours. Many Phase I communities utilize hotlines to track down intermittent and transitory discharges, and regard them as one of their most effective tools to isolate illicit discharges (CWP, 2002).

This appendix describes the six steps needed to establish a hotline to report and track illicit discharges.

Step 1. Define the scope

The community must first determine its need for an IDDE complaint hotline and should not establish one simply because it does not currently exist. An IDDE hotline may be appropriate for a community for the following reasons:

- The municipality already receives a high volume of complaint calls associated with illicit discharges. Without a designated number, complaints may be received by several different departments, which can lead to inconsistent handling of concerns. If a community is unsure of the number of complaints received across the municipality, it may want to quickly survey departments likely to receive calls. A hotline can help promote stakeholder reporting of incidents and make the reporting process more efficient rather than relying on calls making it to the correct office.
- A community hotline exists that cannot be altered to accommodate the needs of the IDDE program. Situations that would make two hotlines incompatible include: significantly different concerns (e.g., IDDE vs. emergency services); varying jurisdictional limits (e.g., regional vs. city only); and funding restrictions (e.g., hotline is developed with a grant that prevents it from overlapping with other programs).
- Related municipal programs exist that would benefit from the establishment of a hotline, such as erosion and sediment control or storm water management programs. Combining similar services can lead to a significant savings in cost and time.

Communities that have no pressing need for a hotline may still choose to institute a department phone number or email address to field complaints and incident reports during normal business hours, or a website that provides guidance on how to report potential illicit discharges.

Once a community has decided to implement a hotline, the scope of the IDDE hotline should be defined, including the intent and extent of the program. The intent of the hotline may be to process the incident/complaint, and investigate and enforce violations, or to take a more educational approach that also provides information and guidance. It is recommended that communities initiating a hotline for the first time limit the scope to the former intent.

The extent of the hotline refers to the geographic area of coverage as well as the types of incidents that fall under the responsibility of the responding agency or department. Often hotlines are restricted to

one specific jurisdiction to minimize complications with investigating and enforcing violations across jurisdictional lines. Significant coordination and planning are required if the hotline is intended to serve a region or watershed with several jurisdictions. Similar coordination efforts are necessary if a wide range of incidents is handled by the hotline that require multiple agencies or departments to respond. It is important for communities to predetermine what agency or department is best suited and trained to respond to specific incident reports, and for all hotline operators to be well trained and knowledgeable about these distinctions.

Step 2. Create a tracking and reporting system

The next step to establishing an IDDE hotline is to create a tracking and reporting system. The two key features that should be considered are the methods of reporting and methods of responding.

At a minimum, the reporting method should include a telephone call-in system and may also include a website. The phone number and/or internet address should be easy to remember and toll-free if any areas under the jurisdiction of the IDDE program are long-distance from the reporting office. The reporting method should be available 24 hours a day, seven days a week. This around the clock process encourages stakeholders to call as soon as a problem is identified.

Providing an option for anonymous reporting also encourages calls because it can be done without fear of retribution from neighbors, employers, or others. In most cases this is achieved by providing an "Incident ID" that may also be used to allow the caller to track the investigation and know that their concerns are being addressed, as well as build in accountability within the department to respond to hotline callers.

The level of detail collected during an incident report will vary depending on system design and complaint responder training. Many hotlines collect only basic information, however, more detailed information will help prioritize investigations and take advantage of a database system to expand reporting options. A sample Illicit Discharge Incident Tracking Sheet is provided at the end of this Appendix to help facilitate this process. The sheet is intended for use with a phone reporting system, and is designed so that the responder can prompt the caller through each section. This sheet may be modified into a simple, multiple-choice questionnaire if reporting is done through a website or email. The basic information collected during an incident report is described below.

- *Incident ID* - Each incident should receive a unique identification code to ensure accurate tracking and public feedback.

- *Reporter Information* - Reporter contact information may be recorded, however, anonymous reporting is often preferred because it frees the reporter from potential backlash. The date and time of incident must be noted, as it may be different than the time it was called in.

- *Responder Information* - The name of the responder and the time and date of the call should be recorded. The amount of precipitation in the past 24-48 hours is also recorded for reporting purposes.

- *Incident Location* - The location of the potential illicit discharge is one of the most important yet difficult pieces of information to accurately collect. Unique

and visible outfall numbering allows reports to be precisely located. In the absence of outfall IDs, callers should be encouraged to provide the nearest street/intersection information and any general descriptions that tie the site to a nearby landmark or major land use (e.g., shopping center, school, etc.), as well as indicate whether the incident site is located in the stream corridor or in an upland area. Other options are to include blank space for narrative descriptions or for the response team to meet the caller at a nearby known location if the caller cannot provide sufficient locational information.

- *Problem Type* - Providing a list of likely problems and problem descriptions can help to readily identify the potential source. The problem types will likely fall into the following five categories: unnatural stream conditions, sewage, wash water, oil/solvents, and industrial wastes. "Other" should also be included, as exceptions will occur. By identifying a suspected origin, the field team may have a head start on the investigation and suspected repeat offenders can be screened through trend analysis.

- *Problem Indicator Description* - A description of the discharge odor and color, and type of floatables present permits investigators to know what they are looking for and start preparing for how to handle the situation.

- *Investigation Notes* - To properly track and report suspected illicit discharges, the investigation needs to be documented. Key information to record for the initial and follow-up investigation (if applicable) include: date, time, step taken to respond to incident report (not all require follow up), investigators, length of time spent for investigation, corrective actions taken, date case closed, and any other pertinent information.

Due to the intermittent nature of illicit discharges, a 24-hour investigation response can increase the likelihood of identifying and eliminating problems. While some problems require more immediate attention than others, investigators should always respond as soon as appropriate. Calls should be screened by a "live" person so only the most urgent calls are passed through a pager system in order to minimize the pressure that 24-hour response places on investigators at odd hours. The complaint questions should be detailed enough to help support this basic prioritization.

Some communities may determine that 24-hour response is cost prohibitive, and that non-emergency response will only occur during normal working hours (e.g., 8AM - 5PM). In these situations, it is essential that explicit instructions be provided to the caller in case of a true emergency.

Another aspect of responding to complaints is determining when another department or agency should handle the problem. An incident may need to be passed on because the reported problem falls under the responsibility of another department, such as the fire or health department. Having specific guidelines for the call responder and investigators is imperative to handling these incidents appropriately.

Step 3. Train personnel

Training of complaint respondents should include how to provide good customer service, the basics of illicit discharge identification and details of the tracking and reporting process. The responder should be

trained so that he/she understands the significance of the information being collected and can go beyond the "check boxes" when necessary to answer the reporter questions, as well as guide the caller through the data collection process. This ensures that the incident is handled correctly, and that the caller feels that the concern is in good hands.

An initial screening of the potential illicit source by the responder can be useful. Table C1 provides a list of descriptions of common illicit discharges called in and the likely source or situation.

Inter- and intra-department training should focus on the importance of IDDE, the complaint hotline investigation and tracking process, and the expected responsibilities of each involved entity. Such training can greatly increase watershed wide awareness of illicit discharge problems and is essential to developing good working relationships with other departments.

Step 4. Advertise

Public relations are an important aspect of a pollution hotline. Many municipalities have noted that there is always a peak in incident reporting following an advertising campaign. Advertising the hotline phone number or web address several times a year keeps the message fresh in public minds. Effective methods include magnets, stickers, phone book advertisements, flyers, bill inserts, displays, fair booths and newspaper articles.

Advertising, including publicizing success stories about the hotline serves several purposes. First it highlights the responsiveness of the program to the general public. Second, it serves as a means to further promote the hotline. Third, it builds public support for the program and fosters public stewardship. Success stories can be published through newspaper articles, TV broadcasts or other highly visible means of advertising. The stories will build general awareness of illicit discharge issues and promote greater public stewardship and accountability by both those reporting the problems and potential violators.

Table C1: Types of Potential IDDE Hotline Complaints

Typical Call-in Indicators	Likely Source
Sewage smell, or floatables from storm drain outfall during dry weather flow	Storm and sanitary sewer cross-connection
Small (<6" diameter) pipe directly discharging to receiving water	Straight pipe discharge from home or business
Greatly discolored or unnatural smelling liquid (often hydrocarbons) flowing from or pooling on property or from outfall below property	Dumping
Sewage smell; extra green vegetation; saturated ground	Failing septic system
Muddy water; sediment deposits, up stream construction site	Poor erosion and sediment control

Step 5. Respond to complaints

Hotline customer service staff should provide friendly and knowledgeable service to callers that might include an overview of the investigation process, how long a response should take, and an incident tracking ID so the caller can follow-up on the complaint. Hotline staff should arrange to send an investigator out to the incident site as soon as possible.

Investigators should respond to complaints in a timely manner, and provide the necessary feedback to the database system. The type of complaint will dictate the necessary response, as well as the timing of the response (e.g., a failing septic system may not be as high a priority as a sanitary sewer overflow). Information submitted to the reporting database might include: time from initial call to investigation, steps taken to investigate, and actions taken to solve the problem.

Step 6. Track incidents

Illicit discharge complaints and incidents should be reported and tracked through a database system in order to meet the following program goals:

- Identify recurring problems and suspected offenders
- Measure program success
- Comply with annual report requirements

Basic data to be compiled and analyzed include the following:

- Number of calls received per year
- Number of incidents investigated
- Number of actual IDDE incidents
- Average time to follow up on incident report
- Average time to remedy identified illicit problem
- Most common problems identified by public

Costs

Table C2 provides planning level costs to establish and maintain a hotline and tracking system. Certain costs can undoubtedly be reduced through sharing of services across departments and even jurisdictions.

Table C2: Cost to Create and Maintain a Successful IDDE Hotline

Steps	Key Elements/ Consideration	Initial Costs	Annual Costs
1. Define the scope	Planning Costs: 60 hrs @ $25/hr to coordinate with other departments and design program basics	$1,500	$0
2. Create a tracking and reporting system	Initial web design: 80hrs @ $25/hr Annual web hosting @ 200/yr[1]	$2,000	$200
	800 toll free number set-up: free Monthly costs: $20/month ($240/yr) + $0.20 per minute (assume average call of 10 minutes and 1000 calls/yr, or $2,000/yr)[2]	$0	$2,240
	Database design: 20 hrs @ $25/hr[1]	$500	$0
3. Train personnel	*Initial*: 3 days (Approx $25/hr) including full day introductory Access training course ($400) = $1,000[3] *Annual*: approx 1/2 day refresher = $200	$1,000	$200
	Initial: presentation prep (24 hrs @ $50/hr) *Annual*: mini-refresher training (16 hrs @ $25/hr to rotate through other departments)	$1,200	$800
4. Advertise	*Initial*: Design brochure and magnets ($1,000)[4,] Design 30 second PSA video spot ($500)[5] *Annual*: 4,000 magnets ($920), 10,000 brochures printed and mailed ($1,500) + 20 hrs or coordination ($500)	$1,500	$2,920
5. Respond to complaints	Assumes 1,000 calls per year at 10 min per complaint[6] to handle including receiving the call, forwarding to appropriate place, logging into a database, and tracking investigation. This time represents approximately 15% of a full time position.	$0	$5,000
6. Track incidents			
TOTAL		**$7,700**	**$11,360**

Ways to reduce cost: Use in-house or donated database, brochure and web design services; combine with other pollution prevention hotlines (e.g., storm water); combine with other local, regional or state IDDE hotline programs; use existing web page hosting services; hire staff with database experience

Notes:

[1] Personal communication with Center for Watershed Protection staff performing similar duties

[2] Sprint Small Business website

[3] ExecuTrain - computer training business

[4] CWP, 1998

[5] CSG, 1998

[6] adapted from TCEQ, 2003

References

Center for Watershed Protection (CWP). 1998. *Rapid Watershed Planning Handbook – A Comprehensive Guide for Managing Urbanizing Watersheds*. Ellicott City, MD.

Center for Watershed Protection. 2002. Unpublished Task I Technical Memorandum in Support of *Illicit Discharge Detection and Elimination Guidance Manual*. Ellicott City, MD.

Council of State Governments (CSG). 1998. *Getting in Step: A Guide to Effective Outreach in Your Watershed*.

Sprint Small Business web site (www.sprintbiz.com.). Accessed May 14, 2003.

Texas Commission of Environmental Quality (TCEQ) Personal Communication. May 9, 2003. Email Jim Reed.

Illicit Discharge Hotline Incident Tracking Sheet

Incident ID:

Responder Information	
Call taken by:	Call date:
Call time:	Precipitation (inches) in past 24-48 hrs:
Reporter Information	
Incident time:	Incident date:
Caller contact information (*optional*):	

Incident Location *(complete one or more below)*

Latitude and longitude:

Stream address or outfall #:

Closest street address:

Nearby landmark:

Primary Location Description	**Secondary Location Description:**		
☐ Stream corridor (*In or adjacent to stream)*	☐ Outfall	☐ In-stream flow	☐ Along banks
☐ Upland area *(Land not adjacent to stream)*	☐ Near storm drain	☐ Near other water source (storm water pond, wetland, etc.):	

Narrative description of location:

Upland Problem Indicator Description

☐ Dumping	☐ Oil/solvents/chemicals	☐ Sewage
☐ Wash water, suds, etc.	☐ Other: _____	

Stream Corridor Problem Indicator Description

Odor	☐ None	☐ Sewage	☐ Rancid/Sour	☐ Petroleum (gas)
	☐ Sulfide (rotten eggs); natural gas	☐ Other: Describe in "Narrative" section		
Appearance	☐ "Normal"	☐ Oil sheen	☐ Cloudy	☐ Suds
	☐ Other: Describe in "Narrative" section			
Floatables	☐ None:	☐ Sewage (toilet paper, etc)	☐ Algae	☐ Dead fish
	☐ Other: Describe in "Narrative" section			

Narrative description of problem indicators:

Suspected Violator (name, personal or vehicle description, license plate #, etc.):

Investigation Notes	
Initial investigation date:	Investigators:
☐ No investigation made	Reason:
☐ Referred to different department/agency:	Department/Agency:
☐ Investigated: No action necessary	
☐ Investigated: Requires action	Description of actions:
Hours between call and investigation:	Hours to close incident:
Date case closed:	
Notes:	

APPENDIX D

OUTFALL RECONNAISSANCE INVENTORY FIELD SHEET

OUTFALL RECONNAISSANCE INVENTORY/ SAMPLE COLLECTION FIELD SHEET

Section 1: Background Data

Subwatershed:		Outfall ID:	
Today's date:		Time (Military):	
Investigators:		Form completed by:	
Temperature (°F):	Rainfall (in.): Last 24 hours: Last 48 hours:		
Latitude:	Longitude:	GPS Unit:	GPS LMK #:
Camera:		Photo #s:	

Land Use in Drainage Area (Check all that apply):

- ☐ Industrial
- ☐ Ultra-Urban Residential
- ☐ Suburban Residential
- ☐ Commercial
- ☐ Open Space
- ☐ Institutional
- Other: _____
- Known Industries: _____

Notes (e.g., origin of outfall, if known):

Section 2: Outfall Description

LOCATION	MATERIAL	SHAPE		DIMENSIONS (IN.)	SUBMERGED
☐ **Closed Pipe**	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other: _____	☐ Circular ☐ Eliptical ☐ Box ☐ Other: _____	☐ Single ☐ Double ☐ Triple ☐ Other: _____	Diameter/Dimensions: _____	In Water: ☐ No ☐ Partially ☐ Fully With Sediment: ☐ No ☐ Partially ☐ Fully
☐ **Open drainage**	☐ Concrete ☐ Earthen ☐ rip-rap ☐ Other: _____	☐ Trapezoid ☐ Parabolic ☐ Other: _____		Depth: _____ Top Width: _____ Bottom Width: _____	
☐ **In-Stream**	**(applicable when collecting samples)**				
Flow Present?	☐ Yes ☐ No ***If No, Skip to Section 5***				
Flow Description (If present)	☐ Trickle ☐ Moderate ☐ Substantial				

Section 3: Quantitative Characterization

FIELD DATA FOR FLOWING OUTFALLS				
PARAMETER		**RESULT**	**UNIT**	**EQUIPMENT**
☐Flow #1	Volume		Liter	Bottle
	Time to fill		Sec	
☐Flow #2	Flow depth		In	Tape measure
	Flow width	_____' _____"	Ft, In	Tape measure
	Measured length	_____' _____"	Ft, In	Tape measure
	Time of travel		S	Stop watch
Temperature			°F	Thermometer
pH			pH Units	Test strip/Probe
Ammonia			mg/L	Test strip

Outfall Reconnaissance Inventory Field Sheet

Section 4: Physical Indicators for Flowing Outfalls Only

Are Any Physical Indicators Present in the flow? ☐ Yes ☐ No *(If No, Skip to Section 5)*

INDICATOR	CHECK if Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)		
Odor	☐	☐ Sewage ☐ Rancid/sour ☐ Petroleum/gas ☐ Sulfide ☐ Other:	☐ 1 – Faint	☐ 2 – Easily detected	☐ 3 – Noticeable from a distance
Color	☐	☐ Clear ☐ Brown ☐ Gray ☐ Yellow ☐ Green ☐ Orange ☐ Red ☐Other:	☐ 1 – Faint colors in sample bottle	☐ 2 – Clearly visible in sample bottle	☐ 3 – Clearly visible in outfall flow
Turbidity	☐	See severity	☐ 1 – Slight cloudiness	☐ 2 – Cloudy	☐ 3 – Opaque
Floatables -Does Not Include Trash!!	☐	☐ Sewage (Toilet Paper, etc.) ☐ Suds ☐ Petroleum (oil sheen) ☐ Other:	☐ 1 – Few/slight; origin not obvious	☐ 2 – Some; indications of origin (e.g., possible suds or oil sheen)	☐ 3 - Some; origin clear (e.g., obvious oil sheen, suds, or floating sanitary materials)

Section 5: Physical Indicators for Both Flowing and Non-Flowing Outfalls

Are physical indicators that are not related to flow present? ☐ Yes ☐ No *(If No, Skip to Section 6)*

INDICATOR	CHECK if Present	DESCRIPTION	COMMENTS
Outfall Damage	☐	☐ Spalling, Cracking or Chipping ☐ Peeling Paint ☐ Corrosion	
Deposits/Stains	☐	☐ Oily ☐ Flow Line ☐ Paint ☐ Other:	
Abnormal Vegetation	☐	☐ Excessive ☐ Inhibited	
Poor pool quality	☐	☐ Odors ☐ Colors ☐ Floatables ☐ Oil Sheen ☐ Suds ☐ Excessive Algae ☐ Other:	
Pipe benthic growth	☐	☐ Brown ☐ Orange ☐ Green ☐ Other:	

Section 6: Overall Outfall Characterization

☐ Unlikely ☐ Potential (presence of two or more indicators) ☐ Suspect (one or more indicators with a severity of 3) ☐ Obvious

Section 7: Data Collection

1. Sample for the lab?	☐ Yes	☐ No	
2. If yes, collected from:	☐ Flow	☐ Pool	
3. Intermittent flow trap set?	☐ Yes	☐ No	If Yes, type: ☐ OBM ☐ Caulk dam

Section 8: Any Non-Illicit Discharge Concerns (e.g., trash or needed infrastructure repairs)?

APPENDIX E

FLOW TYPE DATA FROM TUSCALOOSA AND BIRMINGHAM, AL

Appendix E1: Data Tables for Tuscaloosa

Table E1.1: Tap Water Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	B.B.Commer Hall	5/17/2002	8.19	132	N/A	N/A	0	0.97	63.6	0	N/A	N/A
2	Rose Towers	5/17/2002	7.92	145	N/A	N/A	0	0.97	68.4	0	N/A	N/A
3	H.C.Commer Hall	5/17/2002	8.46	125	N/A	N/A	0	0.96	60.8	0	N/A	N/A
4	Rec Centre	5/17/2002	8.11	130	N/A	N/A	0	0.92	64.8	0	N/A	N/A
5	Coleman Coliseum	5/17/2002	8.28	130	N/A	N/A	0	0.94	72.8	0	N/A	N/A
6	Mib (UA)	5/29/2003	7.81	146	N/A	1.15	0	1.04	28	0	2115	4.88
7	Alex Appt.	5/30/2003	7.38	156	N/A	0.761	0	0.82	44	0	92	0.21
8	Georgas Library (UA)	6/3/2003	8.13	152	N/A	0.811	0		42	0	1255	2.9
9	Rodgers Library	6/8/2003	7.5	141	N/A	0.566	0	0.84	40	0	165	0.38
10	Alexander Property Appt.	6/8/2003	7.5	138	N/A	0.61	0	0.89	46	0	637	1.47
11	Pslidea Court Appt.	6/8/2003	7.68	139	N/A	0.433	0	1.00	44	0	566	1.3
12	University Plaza Appt.	6/8/2003	7.5	140	N/A	0.856	0	0.94	46	0	1003	2.31
Mean			7.87	140	-	0.74	0	0.94	52	0	833	1.92
Standard Deviation			0.36	9.3	-	0.23	0	0.065	14	0	702	1.62
COV			0.05	0.07	-	0.32	-	0.07	0.27	-	0.84	0.84
Anderson Darling Probability Test Value (Normal)			**1.138**	**1.004**	-	**1.57**	-	**1.144**	**1.331**	-	-	**1.601**
Anderson Darling Probability Test Value (Log-normal)			-	0.998	-	1.543	-	1.185	1.307	-	-	1.639

Data provided by Robert Pitt, University of Alabama

Table E1.1: Tap Water Reference ("Library") Samples, CONT.

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	B.B.Commer Hall	5/17/2002	1	<LD	N/A	N/A	N/A	N/A	N/A
2	Rose Towers	5/17/2002	1	<LD	N/A	N/A	N/A	N/A	N/A
3	H.C.Commer Hall	5/17/2002	1	<LD	N/A	N/A	N/A	N/A	N/A
4	Rec Centre	5/17/2002	1	<LD	N/A	N/A	N/A	N/A	N/A
5	Coleman Coliseum	5/17/2002	1	<LD	N/A	N/A	N/A	N/A	N/A
6	Mib (UA)	5/29/2003	2	0.01	0.005	0.19	1	<1	<1
7	Alex Appt.	5/30/2003	2	<LD	N/A	0.1	<1	<1	<1
8	Georgas Library (UA)	6/3/2003	1	<LD	N/A	0.12	<1	<1	<1
9	Rodgers Library	6/8/2003	1	<LD	N/A	0.04	21.6	<1	<1
10	Alexander Property Appt.	6/8/2003	1	0.07	0.07	0.14	<1	<1	<1
11	Pslidea Court Appt.	6/8/2003	2	0.07	0.035	0.27	<1	<1	<1
12	University Plaza Appt.	6/8/2003	2	0.07	0.035	0.11	<1	<1	<1
Mean			1.3	<0.055	0.036	0.14	<11	<1	<1
Standard Deviation			0.49	0.03	0.026	0.07	15	-	-
COV			0.37	0.55	0.73	0.53	1.3	-	-
Anderson Darling Probability Test Value (Normal)			**3.809**	**3.199**	**2.539**	**1.663**	4.103	-	-
Anderson Darling Probability Test Value (Log-normal)			3.809	3.199	2.703	1.685	4.103	-	-

Data provided by Robert Pitt, University of Alabama

Table E1.2: Spring Water Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	Marrs Spring	9/30/2002	5.77	128	30	56	0	0.01	24.6	0	N/A	0.94
2	Jack Warner Pkwy	10/11/2002	6.46	124	30	67	0	0.01	34.4	0	N/A	0.56
3	Marrs Spring	11/3/2002	6.21	166	N/A	0.85	0	0.01	40.2	0	N/A	4.84
4	Jack Warner Pkwy	11/3/2002	6.36	112	N/A	42	0	0.01	28.6	0	N/A	6.64
5	Marrs Spring	3/11/2003	6.64	230	N/A	0.591	0	0.08	38	0	N/A	0.46
6	Jack Warner Pkwy	5/16/2003	6.45	126	N/A	19.3	0	0.21	32	0	20754	47.97
7	Jack Warner Pkwy	5/17/2003	6.16	128	N/A	19.6	0	0.17	44	0	2296	5.30
8	Marrs Spring	5/18/2003	6.82	182	N/A	1.78	0	0.39	42	0	1542	3.56
9	Marrs Spring	5/30/2003	6.43	143	N/A	1.12	5	0.31	40	0	1130	2.61
10	Marrs Spring	6/3/2003	6.81	200	N/A	21.2	27	0.07	42	0	6537	15.11
11	Jack Warner Pkwy	6/3/2003	5.63	125	72	4.08	0	0.14	48	0	7855	18.15
12	Jack Warner Pkwy	6/5/2003	6.04	130	68	4.89	0	0.24	48	0	5343	12.35
Mean			**6.3**	**149**	**50**	**19.8**	**2.6**	**0.13**	**38**	**0**	**6493**	**9.8**
Standard Deviation			**0.37**	**36**	**23**	**23**	**7.7**	**0.12**	**7.3**	**0**	**6800**	**13.3**
COV			**0.05**	**0.24**	**0.46**	**1.16**	**2.92**	**0.93**	**0.19**	**-**	**-**	**1.3**
Anderson Darling Probability Test (Normal)			**1.046**	**1.046**	**1.795**	**-**	**1.726**	**5.451**	**1.215**	**1.08**	**-**	**-**
Anderson Darling Probability Test (Log-normal)			**-**	**-**	**1.633**	**-**	**1.192**	**4.201**	**1.664**	**1.213**	**-**	**-**

Data provided by Robert Pitt, University of Alabama

Table E1.2: Spring Water Reference ("Library") Samples, CONT.

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Marrs Spring	9/30/2002	8	0.01	0.001	N/A	1203.3	4.1	4.1
2	Jack Warner Pkwy	10/11/2002	1	0.02	0.02	N/A	275.5	1	36.4
3	Marrs Spring	11/3/2002	3	0.04	0.013	N/A	N/A	N/A	N/A
4	Jack Warner Pkwy	11/3/2002	2	0.02	0.01	N/A	N/A	N/A	N/A
5	Marrs Spring	3/11/2003	3	0.08	0.026	N/A	N/A	N/A	N/A
6	Jack Warner Pkwy	5/16/2003	3	0.01	0.0033	0.15	116.2	<1	<1
7	Jack Warner Pkwy	5/17/2003	2	0.29	0.14	0.15	>2419.2	290.9	412
8	Marrs Spring	5/18/2003	4	0.01	0.0025	0.14	>2419.2	172.3	140.8
9	Marrs Spring	5/30/2003	3	0.05	0.016	0.09	111.2	<1	3.1
10	Marrs Spring	6/3/2003	2	0.05	0.025	0.16	>2419.2	9.7	65.7
11	Jack Warner Pkwy	6/3/2003	4	0.05	0.012	0.09	4.1	1	<1
12	Jack Warner Pkwy	6/5/2003	3	0.05	0.016	0.04	7.2	<1	<1
Mean			3.1	0.057	0.024	0.117	>286	<80	<110
Standard Deviation			1.7	0.077	0.039	0.045	460	123	156
COV			0.55	1.35	1.592	0.381	1.60	1.54	1.41
Anderson Darling Probability Test Value (Normal)			1.9	3.01	3.498	**1.864**	2.06	3.27	2.66
Anderson Darling Probability Test Value (Log-normal)			**1.4**	**1.2**	**1.3**	2.04	1.55	2.14	1.47

Data provided by Robert Pitt, University of Alabama

Table E1.3: Car Wash Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)
1	Gee's Car Wash-Self Service	10/31/2002	6.62	320	26	263	100	<LD	56		N/A
2	Texaco Gas Station - Automatic Carwash	10/31/2002	6.90	300	28	232	>100	0.04	15	150	N/A
3	Chevey Gas Station - Automatic Carwash	5/16/2003	7.00	260	N/A	383	80.00	6.45	68	120	46162
4	Self service carwash-University Blvd.	5/17/2003	9.04	380	N/A	81	>100	1.70	76	150	19192
5	Self service carwash-University Blvd.	5/17/2003	7.37	390	N/A	239	>100	0.56	78	140	294014
6	Chevey Gas Station - Automatic Carwash	5/17/2003	9.34	570	N/A	264	>100	<LD	82	80	39262
7	Chevey Gas Station-McFarland - Automatic Carwash	5/29/2003	7.79	210	N/A	62	77.00	1.47	83	200	41341
8	Parade gas station (McFarland) - Automatic Carwash	6/3/2003	8.57	200	N/A	207	>100	0.05	84	150	54268
9	Stop and go self service carwash-Skyland Blvd.	6/3/2003	6.81	200	70	65	80.00	0.42	76	120	70180
10	Parade gas station-(Skyland Blvd.) - Automatic Carwash	6/3/2003	7.53	192	70	69	60.00	0.19	74	150	35731
11	Shell gas station (Skyland Blvd.) - Automatic Carwash	6/3/2003	7.2	120	71	1	30.00	0.50	82	150	14937
12	Parade gas station (Skyland Blvd.) - Automatic Carwash	6/8/2003	7.89	154	N/A	14	0.00	0.87	80	140	13681
Mean			7.67	274	53	156	>61	1.22	71	140	62876
Standard Deviation			0.89	126	23	122	34	1.92	19	29	83144
COV			0.11	0.45	0.44	0.77	0.56	1.56	0.27	0.20	1.32
Anderson Darling Probability Test (Normal)			**1.22**	**1.27**	-	**1.33**	**1.96**	2.66	**1.72**	**1.87**	-
Anderson Darling Probability Test (Log-normal)			-	1.02	-	1.79	2.18	**1.20**	1.81	3.12	-

Data provided by Robert Pitt, University of Alabama

Table E1.3: Car Wash Reference ("Library") Samples, CONT.

Sample number	Sampling Location	Date	Fluorescence (mg/L as "Tide")	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Gee's Car Wash-Self Service	10/31/2002	132	10	0.44	0.044	N/A	>2419.2	1553.1	>2419.2
2	Texaco Gas Station - Automatic Carwash	10/31/2002	130	2	0.65	0.33	N/A	>2419.2	1413.60	6.20
3	Chevey Gas Station - Automatic Carwash	5/16/2003	106	2	0.37	0.19	0.50	>2419.2	4.1	5.2
4	Self service carwash-University Blvd.	5/17/2003	44	5	0.28	0.06	0.65	>2419.2	14.6	3.1
5	Self service carwash-University Blvd.	5/17/2003	55	2	0.03	0.02	1.23	>2419.2	>2419.2	1
6	Chevey Gas Station - Automatic Carwash	5/17/2003	90	3	4.50	1.50	1.74	>2419.2	1413.6	>2419.2
7	Chevey Gas Station-McFarland - Automatic Carwash	5/29/2003	95	3	0.75	0.25	0.37	>2419.2	15.8	<1
8	Parade gas station (McFarland) - Automatic Carwash	6/3/2003	125	2	0.25	0.13	0.48	>2419.2	11.9	11.1
9	Stop and go self service carwash-Skyland Blvd.	6/3/2003	162	6	1	0.17	0.70	>2419.2	235.9	<1
10	Parade gas station-(Skyland Blvd.) - Automatic Carwash	6/3/2003	82	2	0.25	0.13	0.50	>2419.2	15.5	<1
11	shell gas station (Skyland Blvd.) - Automatic Carwash	6/3/2003	34	3	0.05	0.02	0.09	>2419.2	1553.1	2419.2
12	parade gas station (Skyland Blvd.) - Automatic Carwash	6/8/2003	31	3	2.25	0.75	0.28	<1	<1	<1
Mean			90	3.6	0.90	0.29	0.65	>2419.2	>623	>407
Standard Deviation			42	2.4	1.2	0.42	0.48	-	744	985
COV			0.46	0.667	1.4	1.4	0.74	-	1.1	2.4
Anderson Darling Probability Test (Normal)			**1.029**	2.313	2.6	2.58	1.678	-	2.158	4.467
Anderson Darling Probability Test (Log-normal)			1.254	**1.71**	**1.103**	**0.999**	**1.34**	-	1.626	2.372

Data provided by Robert Pitt, University of Alabama

Table E1.4: Laundry Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	Renee's House (unknown)	11/3/2002	6.52	220	26	90.40	20	1.27	13.00	1000.00	N/A	1231
2	Renee's House (unknown)	12/14/2002	6.22	180	26	66.20	30	0.98	18.00	920.00	N/A	1002
3	Renee's House (unknown)	5/11/2003	9.06	440	N/A	366.00	20	0.82	54	900	644924	1490
4	Renee's House (unknown)	5/11/2003	7.73	1690	N/A	85.70	20	0.78	60	1020	744120	1720
5	Renee's House (unknown)	5/11/2003	9.63	360	N/A	398.00	20	1.07	58	1000	131046	302
6	Yukio's apartment (Purex)	5/30/2003	7.10	590	N/A	226.00	20	0.84	42	920	886425	2049
7	Yukio's apartment (Purex)	5/31/2003	8.7	370	81	344	20	0.76	46	800	606787	1402
8	Suman (Tide)	5/30/2003	7.1	430	70	25	>100	0.05	52	620	1280468	2805
9	Yukio's apartment (Purex)	6/3/2003	8.2	470	84	128	>100	0.38	50	760	583967	1349
10	Soumya (Tide)	6/3/2003	8.03	420	110	304	>100	1.04	56	420	745300	1722
11	Veera (Gain)	6/3/2003	9.45	240	N/A	135	45	1.12	54	580	186050	430
12	Sanju (Tide)	6/8/2003	7.2	152	N/A	59.1	40	1.09	44	480	260002	601
Mean			7.91	463.5	26	185	>26	0.85	45	785	532069	1342
Standard Deviation			1.12	408	26	134	9.93	0.34	15	212	271933	709
COV			0.14	0.880	N/A	0.72	0.38	0.40	0.33	0.27	0.51	0.52
Anderson Darling Probability Test Value (Normal)			**1.013**	2.641	N/A	1.401	**2.578**	**1.42**	**1.841**	**1.28**	-	**1.035**
Anderson Darling Probability Test Value (Log-normal)			-	1.298	N/A	**1.132**	2.587	2.71	2.583	1.435	-	1.32

Data provided by Robert Pitt, University of Alabama

Table E1.4: Laundry Reference ("Library") Samples, CONT.

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Renee's House (unknown)	11/3/2002	2	1.10	0.55	N/A	N/A	N/A	N/A
2	Renee's House (unknown)	12/14/2002	2	0.89	0.44	N/A	N/A	N/A	N/A
3	Renee's House (unknown)	5/11/2003	7	2.50	0.35	0.53	290.9	<1	<1
4	Renee's House (unknown)	5/11/2003	4	0.50	0.12	0.36	<1	<1	<1
5	Renee's House (unknown)	5/11/2003	15	0.53	0.03	0.67	<1	<1	<1
6	Yukio's apartment (Purex)	5/30/2003	15	1.50	0.1	0.75	>2419.2	>2419.2	<1
7	Yukio's apartment (Purex)	5/31/2003	9	5	0.55	0.58	>2419.2	20.1	<1
8	Suman (Tide)	5/30/2003	5	8	1.6	7.90	>2419.2	<1	<1
9	Yukio's apartment (Purex)	6/3/2003	12	3	0.25	0.97	>2419.2	19.7	<1
10	Soumya (Tide)	6/3/2003	2	5	2.5	10.80	<1	<1	<1
11	Veera (Gain)	6/3/2003	2	2	1	1.16	<1	<1	<1
12	Sanju (Tide)	6/8/2003	3	9	3	0.70	<1	<1	<1
Mean			6.5	3.2	0.87	2.4	>2419.2	-	<1
Standard Deviation			5.0	2.8	0.98	3.7	-	-	-
COV			0.78	0.89	1.12	1.59	-	-	-
Anderson Darling Probability Test Value (Normal)			1.568	1.468	1.871	3.419	-	-	-
Anderson Darling Probability Test Value (Log-normal)			**1.294**	**0.982**	**0.99**	**2.106**	-	-	-

Data provided by Robert Pitt, University of Alabama

Table E1.5: Sewage (Dry Weather) Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	Tuscaloosa WWTP (Dry Season)	12/18/2002	6.44	780	N/A	192	>100	0.64	36	10	N/A	260
2	Tuscaloosa WWTP (Dry Season)	1/8/2003	6.56	2100	N/A	306	>100	0.74	42	10	N/A	156
3	Tuscaloosa WWTP (Dry Season)	1/15/2003	6.42	1500	N/A	203	>100	0.64	52	12.5	N/A	142
4	Tuscaloosa WWTP (Dry Season)	3/11/2003	6.9	1280	N/A	53.6	>100	0.68	68	10	N/A	189
5	Tuscaloosa WWTP (Dry Season)	5/18/2003	7.1	540	N/A	230	70	0.65	65	8	114406	264
6	Tuscaloosa WWTP (Dry Season)	5/29/2003	6.99	1090	N/A	128	100	0.82	42	8	115847	267
Mean			6.73	1215	-	185	>100	0.695	50	9.7	115126	213
Standard Deviation			0.29	553	-	86	-	0.072	13	1.66	1018	57
COV			0.04	0.45	-	0.46	-	0.104	0.260	0.171	0.009	0.27
Anderson Darling Probability Test Value (Normal)			**1.878**	**1.96**	-	**1.77**	**-**	**1.992**	**1.874**	**2.012**	-	**2.042**
Anderson Darling Probability Test Value (Log-normal)			-	1.913	-	1.996	-	1.96	1.846	2	-	2.025

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Tuscaloosa WWTP (Dry Season)	12/18/2002	11	11	1	N/A	>2419.2	>2419.2	>2419.2
2	Tuscaloosa WWTP (Dry Season)	1/8/2003	10	14	1.4	N/A	N/A	N/A	N/A
3	Tuscaloosa WWTP (Dry Season)	1/15/2003	15	18	1.2	N/A	>2419.2	>2419.2	>2419.2
4	Tuscaloosa WWTP (Dry Season)	3/11/2003	11	45	4.0	N/A	>2419.2	816.4	43.6
5	Tuscaloosa WWTP (Dry Season)	5/18/2003	15	37.5	2.5	N/A	N/A	N/A	N/A
6	Tuscaloosa WWTP (Dry Season)	5/29/2003	9	27	3	0.97	>24192000	12033000	613000
Mean			11.8	25.4	2.19	0.97	>2419.2	6000000	300000
Standard Deviation			2.5	13.6	1.21	-	-	8500000	430000
COV			0.21	0.53	0.55	-	-	1.41	1.41
Anderson Darling Probability Test Value (Normal)			**2.026**	**1.77**	**1.81**	-	-	3.066	3.065
Anderson Darling Probability Test Value (Log-normal)			1.955	1.737	1.785	-	-	2.846	2.672

Data provided by Robert Pitt, University of Alabama

Table E1.6: Sewage (Wet Weather) Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	Tuscaloosa WWTP (Wet Season)	5/30/2003	6.8	1240	N/A	202	>100	0.19	52	8	115770	267
2	Tuscaloosa WWTP (Wet Season)	6/2/2003	6.81	1250	N/A	270	>100	0.22	48	7.5	126580	292
3	Tuscaloosa WWTP (Wet Season)	6/3/2003	6.99	440	N/A	255	100	0.25	44	6	108689	251
4	Tuscaloosa WWTP (Wet Season)	6/4/2003	6.92	440	N/A	231	100	0.14	52	8	129110	298
5	Tuscaloosa WWTP (Wet Season)	6/5/2003	7.00	550	N/A	113	57	0.20	54	7.5	109058	252
6	Tuscaloosa WWTP (Wet Season)	6/6/2003	7.00	850	N/A	259	60	0.17	47	7.5	105607	244
Mean			6.9	795	-	221	>79	0.19	49	7.4	115802	267
Standard Deviation			0.09	379	-	58	24	0.03	3.78	0.73	9932	22
COV			0.01	0.47	-	0.26	0.30	0.197	0.07	0.0996	0.086	0.086
Anderson Darling Probability Test Value (Normal)			**2.097**	**1.722**	-	**2.097**	**2.72**	**1.708**	**1.83**	**2.357**	-	**1.911**
Anderson Darling Probability Test Value (Log-normal)			-	1.725	-	2.3	2.706	1.734	1.838	2.43	-	1.898

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Tuscaloosa WWTP (Wet Season)	5/30/2003	11	30	2.72	1.38	>24192000	2851000	833000
2	Tuscaloosa WWTP (Wet Season)	6/2/2003	12	35	2.91	0.98	>24192000	3654000	598000
3	Tuscaloosa WWTP (Wet Season)	6/3/2003	12	22.5	1.87	0.93	>24192000	2187000	292000
4	Tuscaloosa WWTP (Wet Season)	6/4/2003	10	22.5	2.25	1.05	>24192000	1785000	328000
5	Tuscaloosa WWTP (Wet Season)	6/5/2003	11	36	3.27	1.01	>24192000	3255000	369000
6	Tuscaloosa WWTP (Wet Season)	6/6/2003	14	27.5	1.96	0.78	>24192000	2282000	609000
Mean			11.6	28.9	2.500	1.02	>24192000	2669000	504833
Standard Deviation			1.3	5.8	0.55	0.19	-	708561	210828
COV			0.11	0.203	0.22	0.195	-	0.265	0.418
Anderson Darling Probability Test Value (Normal)			**1.891**	**1.809**	**1.751**	**1.984**	-	1.744	1.854
Anderson Darling Probability Test Value (Log-normal)			1.858	1.825	1.761	1.906	-	1.747	1.833

Data provided by Robert Pitt, University of Alabama

Table E1.7: Industrial Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluores-cence (raw signal strength)	Fluores-cence (mg/L as "Tide")
1	DELPHI (Automotive manufacture)(Water supply unknown)	12/18/2002	6.72	240	N/A	91.6	20	0.04	23	7.5	N/A	722
2	PECO FOODS (Poultry Supplier) (City water supply)	12/18/2002	6.44	850	N/A	309	40	0.89	34	10	N/A	149
3	TAMKO (Roofing Products)(Water supply unknown)	12/18/2002	7	380	N/A	251	>100	0.02	32	12.5	N/A	309
4	DELPHI (Automotive manufacture)(Water supply unknown)	1/8/2003	6.88	340	N/A	225	10	LD	30	0.25	N/A	101
5	PECO FOODS (Poultry Supplier)(City water supply)	1/8/2003	6.22	960	N/A	14.8	10	0.72	32	0.5	N/A	130
6	TAMKO (Roofing Products)(Water supply unknown)	1/8/2003	6.9	310	N/A	210	>100	0.01	38	2	N/A	410
7	DELPHI (Automotive manufacture)(Water supply unknown)	1/15/2003	6.42	81	N/A	37.4	15	0.01	36	6	N/A	599
8	PECO FOODS (Poultry Supplier)(City water supply)	1/15/2003	6.36	45	N/A	10	20	0.81	28	5	N/A	150
9	TAMKO (Roofing Products)(Water supply unknown)	1/15/2003	7.3	37	N/A	226	>100	0.01	26	10	N/A	375
Mean			6.6	360	-	152	>19	0.31	31	5.9	-	327
Standard Deviation			0.35	335	-	114	11	0.41	4.7	4.4	-	221
COV			0.053	0.930	-	0.748	0.58	1.309	0.155	0.741	-	0.67
Anderson Darling Probability Test Value (Normal)			**1.321**	1.629	-	**1.538**	2.056	2.414	**1.21**	**1.276**	-	**1.451**
Anderson Darling Probability Test Value (Log-normal)			-	**1.408**	-	1.792	**1.833**	**1.982**	1.254	1.763	-	1.386

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	DELPHI (Automotive manufacture)(Water supply unknown)	12/18/2002	24	0.55	0.02	N/A	920.8	66.3	0
2	PECO FOODS (Poultry Supplier) (City water supply)	12/18/2002	37	6	0.16	N/A	>2419.2	>2419.2	>2419.2
3	TAMKO (Roofing Products)(Water supply unknown)	12/18/2002	8	10	1.25	N/A	>2419.2	3	>2419.2
4	DELPHI (Automotive manufacture)(Water supply unknown)	1/8/2003	92	0.4	0.004	N/A	N/A	N/A	N/A
5	PECO FOODS (Poultry Supplier)(City water supply)	1/8/2003	42	4.5	0.10	N/A	N/A	N/A	N/A
6	TAMKO (Roofing Products)(Water supply unknown)	1/8/2003	32	12	0.37	N/A	N/A	N/A	N/A
7	DELPHI (Automotive manufacture)(Water supply unknown)	1/15/2003	81	0.9	0.01	N/A	>2419.2	<1	<1
8	PECO FOODS (Poultry Supplier)(City water supply)	1/15/2003	45	2	0.04	N/A	>2419.2	>2419.2	866.4
9	TAMKO (Roofing Products)(Water supply unknown)	1/15/2003	37	8.5	0.22	N/A	204.6	<1	<1
Mean			44	4.9	0.24	-	>562	>34	>433.2
Standard Deviation			26.5	4.3	0.39	-	506	44	612
COV			0.60	0.88	1.6	-	0.89	1.2	1.4
Anderson Darling Probability Test Value (Normal)			**1.611**	**1.371**	2.499	-	2.575	2.668	2.172
Anderson Darling Probability Test Value (Log-normal)			1.536	1.436	1.203	-	2.603	1.963	2.467

Data provided by Robert Pitt, University of Alabama

Table E1.8: Industrial (Cintas) Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	CINTAS (Cooperate uniform mfg.)(City water supply)	12/18/2002	11.44	1460	N/A	3388	>100	<LD	35	5	N/A	29
2	CINTAS (Cooperate uniform mfg.)(City water supply)	1/8/2003	9.56	850	N/A	483	>100	<LD	40	10	N/A	285
3	CINTAS (Cooperate uniform mfg.)(City water supply)	1/15/2003	10.22	85	N/A	4023	>100	0.02	32	3	N/A	66
Mean			10.4	798	-	2631	>100	<0.02	35	6	-	127
Standard Deviation			0.95	688	-	1887	-	-	4.0	3.6	-	138
COV			0.091	0.86	-	0.71	-	-	0.11	0.6	-	1.08
Anderson Darling Probability Test Value (Normal)			**3.067**	**3.072**	-	**3.21**	-	-	**3.063**	**3.084**	-	**3.15**
Anderson Darling Probability Test Value (Log-normal)			-	3.201	-	3.298	-	-	3.06	3.059	-	3.067

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	CINTAS (Cooperate uniform mfg.)(City water supply)	12/18/2002	53	7.5	0.14	N/A	0	0	0
2	CINTAS (Cooperate uniform mfg.)(City water supply)	1/8/2003	56	6	0.10	N/A	N/A	N/A	N/A
3	CINTAS (Cooperate uniform mfg.)(City water supply)	1/15/2003	85	5	**0.05**	N/A	0	<1	22.2
Mean			64	6.1	0.10	-	0	-	11.1
Standard Deviation			17	1.2	0.04	-	0	-	15.6
COV			0.27	0.20	0.40	-	-	-	1.4
Anderson Darling Probability Test Value (Normal)			**3.182**	**3.06**	**3.079**	-	4.201	-	4.201
Anderson Darling Probability Test Value (Log-normal)			3.167	3.059	3.118	-	-	-	-

Data provided by Robert Pitt, University of Alabama

Table E1.9: Irrigation Reference ("Library") Samples

Sample number	Sampling Location	Date	pH	Spec. cond. (µS/cm)	Temp. (°F)	Turb. (NTU)	Color (APHA Platinum Cobalt Units)	F (mg/L)	Hard. (mg/L $CaCO_3$)	Detergent (mg/L as MBAS)	Fluorescence (raw signal strength)	Fluorescence (mg/L as "Tide")
1	Ferguson Parking (UA) - Run over concrete	5/16/2003	7.91	200	N/A	16.2	0	0.69	62	0	21226	49
2	B.B. Commer (UA) - Run over concrete	5/18/2003	7.38		N/A	4.03	10	0.68	60	0	13915	32
3	Art Building (UA) - Taken at a little puddle, NO concrete	5/16/2003	7.46	200	N/A	64.6	0	0.76	55	0	40040	92
4	MIB (UA) - Run over concrete	5/19/2003	7.18	163	N/A	9.95	20	0.83	58	0	19234	44
5	MIB (UA) - Run over concrete	5/30/2003	7.1	148	89	21.8	50	0.30	40	0	26851	62
6	Art Building (UA) - Taken at a little puddle, NO concrete	5/30/2003	7.46	200	70	96.6	56	0.39	44	0	38389	88
7	Quad(UA) - Taken at a little puddle, NO concrete	5/30/2003	6.99	181	70	826	54	0.23	52	0	30820	53
8	MIB (UA) - Run over concrete	6/5/2003	7.26	183	82	14.5	50	0.64	54	0	23353	53
9	MIB (UA) - Taken at a little puddle, NO concrete	6/5/2003	7.16	182	78	16.5	30	0.91	52	0	17788	41
10	Bevil (UA) - Taken at a little puddle, NO concrete	6/5/2003	6.91	156	72	32	27	0.57	48	0	24149	55
11	MIB (UA) - Run over concrete	6/9/2003	7.4	183	78	9	40	0.84	66	0	23160	53
12	MIB (UA) - Taken at a little puddle, NO concrete	6/9/2003	7.3	194	80	16.6	50	0.57	54	0	23260	53
Mean			7.2	180	77	93	32	0.61	53	0	25182	56
Standard Deviation			0.26	18	6.5	232	20	0.21	7.3	0	7831	17
COV			0.03	0.10	0.08	2.46	0.64	0.35	0.13	-	0.31	0.31
Anderson Darling Probability Test Value (Normal)			**1.147**	**1.401**		5.099	**1.296**	**1.103**	**1.002**	-	-	1.718
Anderson Darling Probability Test Value (Log-normal)			-	1.457		**1.516**	1.677	1.457	1.006	-	-	**1.383**

Data provided by Robert Pitt, University of Alabama

Table E1.9: Irrigation Reference ("Library") Samples, CONT.

Sample number	Sampling Location	Date	K (mg/L)	NH_3 (mg/L as N)	NH_3/K (ratio)	B (mg/L)	Total Coliforms (MPN/100 mL)	*E. coli* (MPN/100 mL)	Enterococci (MPN/100 mL)
1	Ferguson Parking (UA) - Run over concrete	5/16/2003	2	<LD	N/A	0.14	>2419.2	27.8	>2419.2
2	B.B. Commer (UA) - Run over concrete	5/18/2003	9	1.0	0.111	0.20	>2419.2	8.3	2
3	Art Building (UA) - Taken at a little puddle, NO concrete	5/16/2003	5	0.08	0.016	0.25	>2419.2	>2419.2	>2419.2
4	MIB (UA) - Run over concrete	5/19/2003	3	0.21	0.07	0.13	>2419.2	>2419.2	>2419.2
5	MIB (UA) - Run over concrete	5/30/2003	2	3.5	1.75	0.2	>2419.2	31.8	>2419.2
6	Art Building (UA) -Taken at a little puddle, NO concrete	5/30/2003	4	0.5	0.125	0.36	>2419.2	>2419.2	287.7
7	Quad(UA) - Taken at a little puddle, NO concrete	5/30/2003	5	1	0.2	0.5	>2419.2	>2419.2	>2419.2
8	MIB (UA) - Run over concrete	6/5/2003	9	4.5	0.5	0.22	>2419.2	>2419.2	>2419.2
9	MIB (UA) - Taken at a little puddle, NO concrete	6/5/2003	8	0.5	0.06	0.14	>2419.2	>2419.2	>2419.2
10	Bevil (UA) - Taken at a little puddle, NO concrete	6/5/2003	4	1	0.25	0.23	>2419.2	1299.7	>2419.2
11	MIB (UA) - Run over concrete	6/9/2003	7	0.5	0.07	0.25	>4838.4	>4838.4	>4838.4
12	MIB (UA) - Taken at a little puddle, NO concrete	6/9/2003	10	1	0.1	0.35	>4838.4	>4838.4	>4838.4
Mean			5.6	1.25	0.29	0.24	>2419.2	>2419.2	>2419.2
Standard Deviation			2.8	1.41	0.50	0.10	-	-	-
COV			0.50	1.12	1.69	0.43	-	-	-
Anderson Darling Probability Test Value (Normal)			**1.144**	2.471	3.343	1.366	-	-	-
Anderson Darling Probability Test Value (Log-normal)			1.146	**1.325**	**1.277**	**1.094**	-	-	-

Data provided by Robert Pitt, University of Alabama

Appendix E-2. Data Tables for Birmingham

Table E2.1: Spring Water Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	310	0.09	231	0	11	0.83	0.02	6.92	0	0.00	0	NA	NA
2	288	0.01	239	0	4	0.76	0.00	6.89	0	0.00	0	NA	NA
3	327	0.01	255	0	5	0.69	0.01	7.01	0	0.00	0	NA	NA
4	310	0.03	248	0	5	0.72	0.05	6.98	0	0.01	0	0	0
5	301	0.05	240	0	10	0.74	0.00	7.00	0	0.01	0	0	0
6	295	0.00	243	0	2	0.73	0.00	6.87	0	0.00	0	0	0
7	298	0.03	241	0	6	0.56	0.00	6.99	0	0.00	0	0	0
8	290	0.03	229	0	8	0.72	0.00	6.95	0	0.00	0	0	0
9	295	0.05	233	0	10	0.76	0.00	6.99	0	0.01	0	0	0
10	298	0.01	239	0	7	0.77	0.01	7.01	0	0.00	0	0	0
Mean	301	0.03	240	0	7	0.73	0.01	6.96	0	0.00	0	0	0
St. Dev.	11.6	0.03	7.83	0	2.9	0.07	0.02	0.05	0	0.00	0	0	0
95% conf limits (mean +/-)	6.87	0.02	4.63	0	1.7	0.04	0.01	0.03	0	0.00	0	0	0
Median	298	0.03	240	0	7	0.74	0.00	6.99	0	0.00	0	0	0
Coefficient of Variability	0.04	1.00	0.03	--	0.43	0.10	2.00	0.01	--	--	--	--	--
Distribution	normal	normal	normal	uniform	normal	normal	l-norm	normal	uniform	uniform	uniform	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.2: Shallow Ground Water Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	5	0.08	5	0	7	NA	NA	NA	5	0.04	0	0.01	0
2	5	0.03	22	0	12	NA	NA	NA	20	0.00	0	0.01	0
3	32	0.14	18	0	160	NA	NA	7.8	35	0.08	0	0.00	0
4	128	0.07	41	0	34	1.70	0.38	6.2	0	0.02	0	0.00	0
5	119	0.05	38	0	22	2.15	0.89	5.4	0	0.00	0	0.00	0
6	77	0.04	29	0	15	0.81	0.08	6.4	10	0.01	0	0.00	0
7	31	0.05	32	0	8	0.91	0.05	6.5	5	0.00	0	0.00	0
8	43	0.06	35	0	11	0.89	0.09	6.7	0	0.00	0	0.00	0
9	46	0.04	27	0	17	1.01	0.13	6.4	5	0.01	0	0.00	0
10	28	0.07	26	0	13	0.83	0.08	6.3	0	0.00	0	0.00	0
Mean	51	0.06	27	0	30	1.19	0.24	6.46	8	0.02	0	0.00	0
St. Dev.	43.3	0.03	10.5	0	46.4	0.53	0.31	0.66	11.4	0.03	0	0.00	0
95% conf limits (mean +/-)	34.6	0.03	8.48	0	37.1	0.42	0.25	0.53	9	0.02		0.00	0
Median	38	0.06	28	0	14	0.91	0.09	6.40	5	0.01	0	0.00	0
Coefficient of Variability	0.84	0.50	0.39	--	1.55	0.44	1.26	0.10	1.42	1.50	--	--	--
Distribution	normal	l-normal	normal	uniform	l-normal	normal	normal	normal	l-normal	normal	uniform	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.3: Samples from Irrigation of Landscaped Areas

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	109	0.98	42.3	0	132.1	6.46	0.28	6.88	5	0.03	0.0	0.00	0.00
2	119	0.93	39.0	0	218.6	9.42	0.24	6.90	15	0.05	0.0	0.00	0.00
3	92	1.65	41.4	0	267.6	3.21	0.55	7.09	15	0.08	0.0	0.00	0.00
4	98	1.94	40.4	0	199.9	6.32	0.40	7.04	10	0.02	0.0	0.00	0.00
5	107	0.97	39.4	0	231.6	5.44	0.41	6.90	10	0.03	0.0	0.00	0.00
6	110	0.81	38.0	0	242.0	6.71	0.37	7.02	13	0.00	0.0	0.00	0.00
7	100	0.93	39.0	0	212.4	6.49	0.31	7.01	10	0.03	0.0	0.00	0.00
8	102	0.89	41.0	0	201.2	4.98	0.48	6.89	7	0.01	0.0	0.00	0.00
9	106	0.91	42.0	0	223.6	5.79	0.35	6.91	5	0.00	0.0	0.00	0.00
10	107	0.98	39.0	0	215.0	6.01	0.32	6.98	10	0.00	0.0	0.00	0.00
Mean	105	0.90	40.2	0	214.4	6.08	0.37	6.96	10	0.03	0.0	0.00	0.00
St. Dev.	7.28	0.10	1.47	0	35.20	1.56	0.09	0.08	3.62	0.03	0.00	0.00	0.00
95% conf. limits (mean +/-)	5.83	0.08	1.18	0	28.17	1.25	0.07	0.06	2.90	0.02	0.00	0.00	0.00
Median	106	0.93	39.9	0	216.80	6.17	0.36	6.95	10	0.03	0.0	0.00	0.00
Coefficient of Variability	0.07	0.11	0.04	--	0.16	0.26	0.25	0.01	0.36	1.00	--	--	--
Distribution	normal	normal	normal	uniform	normal	normal	normal	bi-modal	normal	normal	uniform	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.4: Residential/Commercial Sanitary Sewage Samples

Sample #	Collection Date	Collection Time	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)
1	1-Aug	10 p.m.	265	0.90	149	0.96	240	5.25
2	2-Aug	12 a.m.	320	0.72	161	3.80	200	4.79
3	2-Aiug	2 a.m.	360	0.46	172	0.58	170	3.44
4	2-Aug	4 a.m.	350	0.58	181	0.54	155	3.09
5	2-Aug	6 a.m.	410	0.74	167	0.54	205	4.51
6	2-Aug	8 a.m.	435	0.87	154	0.99	265	5.88
7	2-Aug	10 a.m.	410	1.08	150	0.48	265	5.99
8	2-Aug	12 p.m.	400	0.77	145	3.60	270	5.70
9	2-Aug	2 p.m.	410	0.83	149	0.54	280	7.50
10	2-Aug	4 p.m.	460	0.93	151	0.95	265	7.20
11	2-Aug	6 p.m.	410	0.88	156	0.98	265	6.78
12	2-Aug	8 p.m.	430	0.88	158	0.96	300	7.56
13	4-Aug	6 p.m.	550	0.69	145	4.20	280	7.00
14	4-Aug	8 p.m.	460	0.64	133	4.40	280	6.73
15	4-Aug	10 p.m.	500	0.74	123	0.97	265	6.05
16	5-Aug	12 a.m.	420	0.60	142	0.99	227	4.03
17	5-Aug	2 a.m.	360	0.54	148	0.65	175	3.55
18	5-Aug	4 a.m.	365	0.43	158	0.64	120	4.94
19	5-Aug	6 a.m.	390	0.60	142	0.62	230	7.47
20	5-Aug	8 a.m.	500	1.04	126	0.65	310	7.13
21	5-Aug	10 a.m.	450	0.80	125	0.96	315	6.87
22	5-Aug	12 p.m.	430	0.97	126	0.98	310	6.88
23	5-Aug	2 p.m.	420	0.85	126	0.90	300	7.07
24	5-Aug	4 p.m.	460	0.83	122	0.94	290	7.55
25	6-Aug	6 p.m.	440	0.81	127	2.40	280	7.14
26	6-Aug	8 p.m.	435	0.66	123	1.60	290	6.75
27	6-Aug	10 p.m.	400	0.77	120	0.97	265	6.12
28	7-Aug	12 a.m.	390	0.67	133	0.96	210	5.06
29	7-Aug	2 a.m.	340	0.44	149	0.89	175	3.59
30	7-Aug	4 a.m.	400	0.43	141	0.76	170	3.57
31	7-Aug	6 a.m.	420	0.68	138	0.98	300	6.65
32	7-Aug	8 a.m.	465	1.04	136	0.95	260	5.68
33	7-Aug	10 a.m.	460	0.94	141	3.00	280	6.69
34	7-Aug	12 p.m.	460	0.89	138	3.60	285	6.93
35	7-Aug	2 p.m.	490	0.85	135	4.00	265	7.11
36	7-Aug	4 p.m.	450	0.83	155	2.00	270	6.69
Mean			420	0.76	143	1.50	251	5.97
St. Dev.			55.14	0.17	15.04	1.22	49.88	1.36
95% conf. limits (mean +/-)			18.01	0.06	4.91	0.40	16.33	0.45
Median			420	0.79	142	0.96	265	6.67
Coefficient of Variability			0.13	0.23	0.11	0.82	0.20	0.23
Distribution			normal	normal	normal	normal	normal	normal

Data provided by Robert Pitt, University of Alabama

Table E2.4 (cont.)

Sample #	Collection Date	Collection Time	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	1-Aug	10 p.m.	8.59	7.35	42	0.01	23.8	0.01	0.00
2	2-Aug	12 a.m.	7.25	7.23	10	0.03	29.2	0.00	0.00
3	2-Aiug	2 a.m.	5.02	7.33	12	0.03	30.3	0.00	0.00
4	2-Aug	4 a.m.	5.22	7.24	8	0.01	26.0	0.00	0.00
5	2-Aug	6 a.m.	13.04	7.35	11	0.02	16.3	0.00	0.00
6	2-Aug	8 a.m.	14.23	7.30	12	0.00	23.8	0.00	0.00
7	2-Aug	10 a.m.	13.03	7.17	15	0.01	20.6	0.01	0.00
8	2-Aug	12 p.m.	9.67	6.97	31	0.00	21.7	0.02	0.00
9	2-Aug	2 p.m.	8.00	6.98	28	0.00	15.3	0.00	0.00
10	2-Aug	4 p.m.	8.81	7.12	22	0.00	11.0	0.00	0.00
11	2-Aug	6 p.m.	7.82	7.03	23	0.00	17.4	0.00	0.00
12	2-Aug	8 p.m.	7.32	7.09	21	0.05	19.5	0.01	0.00
13	4-Aug	6 p.m.	10.03	7.21	75	0.00	43.3	NA	NA
14	4-Aug	8 p.m.	9.18	6.94	61	0.03	47.2	NA	NA
15	4-Aug	10 p.m.	11.82	7.10	45	0.00	41.7	NA	NA
16	5-Aug	12 a.m.	11.04	6.89	49	0.00	41.1	NA	NA
17	5-Aug	2 a.m.	6.38	7.10	26	0.02	46.7	NA	NA
18	5-Aug	4 a.m.	6.00	7.05	19	0.01	49.6	NA	NA
19	5-Aug	6 a.m.	12.83	7.16	22	0.00	52.2	NA	NA
20	5-Aug	8 a.m.	19.49	7.06	50	0.01	52.8	NA	NA
21	5-Aug	10 a.m.	12.34	6.88	60	0.00	37.8	NA	NA
22	5-Aug	12 p.m.	10.67	7.00	64	0.00	48.9	NA	NA
23	5-Aug	2 p.m.	8.57	6.98	54	0.01	47.8	NA	NA
24	5-Aug	4 p.m.	9.25	7.06	48	0.00	53.3	NA	NA
25	6-Aug	6 p.m.	11.00	7.03	62	0.02	65.4	NA	NA
26	6-Aug	8 p.m.	9.99	6.98	48	0.04	99.6	NA	NA
27	6-Aug	10 p.m.	10.66	7.01	43	0.10	99.4	NA	NA
28	7-Aug	12 a.m.	8.29	7.06	15	0.03	40.5	NA	NA
29	7-Aug	2 a.m.	5.53	7.13	16	0.00	4.2	NA	NA
30	7-Aug	4 a.m.	5.84	7.13	18	0.01	3.1	NA	NA
31	7-Aug	6 a.m.	17.28	7.16	42	0.02	54.0	NA	NA
32	7-Aug	8 a.m.	15.74	7.18	68	0.00	98.3	NA	NA
33	7-Aug	10 a.m.	10.99	7.03	80	0.00	68.6	NA	NA
34	7-Aug	12 p.m.	10.03	7.08	54	0.00	71.9	NA	NA
35	7-Aug	2 p.m.	7.43	6.86	52	0.01	69.7	NA	NA
36	7-Aug	4 p.m.	8.58	7.11	58	0.03	71.9	NA	NA
Mean			9.92	7.09	38	0.01	43.4	0.00	0.00
St. Dev.			3.33	0.13	20.95	0.02	25.47	0.01	0.00
95% Conf. limits (mean +/-)			1.09	0.04	6.84	0.01	8.32	0.00	0.00
Median			9.46	7.09	42	0.01	42.5	0.00	0.00
Coefficient of Variability			0.34	0.02	0.55	2.00	0.59	--	--
Distribution			L-normal	normal	normal	L-normal	normal	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.5: Residential Septic Tank Discharge Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH (units)	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	82	0.75	252	0.03	511	30.06	117.80	7.23	38	0.03	100	NA	NA
2	108	0.70	186	0.00	547	32.06	124.60	7.38	38	0.01	100	NA	NA
3	56	0.62	186	0.00	536	27.26	114.40	7.16	18	0.00	100	NA	NA
4	397	1.19	36	10.00	266	8.16	26.07	6.61	68	0.01	100	NA	NA
5	482	0.70	29	5.00	321	8.83	135.75	6.53	87	0.03	100	NA	NA
6	362	1.12	36	12.00	351	8.16	26.77	6.67	77	0.00	100	NA	NA
7	812	0.92	80	0.50	466	20.85	89.60	6.63	54	0.00	100	NA	NA
8	812	1.55	84	0.15	431	23.25	91.60	6.59	64	0.01	100	NA	NA
9	762	1.26	82	0.57	471	22.25	86.10	6.54	91	0.03	100	NA	NA
10	432	0.61	45	2.50	455	24.51	95.90	7.39	55	0.20	100	0.00	0.00
11	297	0.42	53	1.00	253	18.66	107.80	6.19	10	0.00	100	0.00	0.00
12	236	0.56	61	0.50	463	21.73	99.30	6.59	100	0.19	100	0.40	0.00
13	327	0.87	63	0.45	339	31.81	113.20	6.72	100	0.20	100	0.35	0.00
Mean	502	0.93	57	3.27	382	18.82	87.21	6.65	70.60	0.07	100	0.19	0.00
St. Dev.	209.87	0.36	20.52	4.35	84.95	7.97	35.11	0.30	27.28	0.09	0.00	0.22	0.00
95% conf. limits (mean +/-)	114.09	0.20	11.16	2.37	46.18	4.33	19.09	0.16	14.83	0.05	0.00	0.12	0.00
Median	414	0.90	57	0.79	391	21.29	93.75	6.60	72.50	0.02	100	0.18	0.00
Coefficient of Variability	0.42	0.39	0.36	1.33	0.22	0.42	0.40	0.04	0.39	1.28	0.00	1.16	--
Distribution	normal	normal	log-normal	log-normal	normal	normal	normal	normal	normal	normal	uniform	bi-modal	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.6: Commercial Carwash Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	448	16.5	145	50.4	1325	22.00	0.28	6.49	380	0.00	100	0.00	0.00
2	450	11.5	149	52.2	1350	22.00	0.32	6.46	340	0.00	100	0.00	0.00
3	550	12.5	152	52.5	1400	78.40	0.20	7.11	190	0.00	100	0.00	0.00
4	490	15.5	150	49.0	1100	40.70	0.23	6.90	190	0.01	100	0.00	0.00
5	495	12.5	158	56.7	1075	47.70	0.19	6.84	190	0.00	100	0.00	0.00
6	470	8.0	160	50.3	1095	35.40	0.14	6.77	240	0.02	100	0.00	0.00
7	480	10.2	172	38.0	1005	48.20	0.23	6.76	200	0.08	100	NA	NA
8	473	11.8	165	49.0	1155	46.20	0.25	6.67	175	0.23	100	NA	NA
9	492	12.3	159	43.5	1190	16.70	0.19	6.40	160	0.12	100	0.00	0.00
10	505	12.2	155	48.0	1205	39.60	0.36	6.80	150	0.15	100	0.00	0.00
Mean	485	12.3	157	49.0	1190	42.69	0.24	6.72	222	0.07	100	0.00	0.00
St. Dev.	9.41	2.40	8.07	5.14	130.79	15.92	0.07	0.22	77.46	0.08	0.00	0.00	0.00
95% conf. limits (mean +/-)	8.23	1.49	5.00	3.19	81.06	9.87	0.04	0.14	48.01	0.05	0.00	0.00	0.00
Median	485	12.3	157	49.7	1173	43.45	0.23	6.77	190	0.05	100	0.00	0.00
Coefficient of Variability	0.06	0.19	0.05	0.10	0.11	0.37	0.28	0.03	0.35	1.14	0.00	--	--
Distribution	normal	normal	normal	normal	normal	normal	normal	normal	normal	bi-modal	uniform	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.7: Commercial Laundry Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	752	15.89	32	37.0	1169.6	3.47	0.94	9.37	25	0.57	100	NA	NA
2	462	23.98	40	21.5	1144.6	3.97	0.96	9.40	59	0.51	100	NA	NA
3	422	54.48	38	17.0	844.6	3.37	0.62	8.37	61	0.44	100	NA	NA
4	589	42.48	36	32.5	819.6	3.67	0.70	8.60	43	0.38	100	NA	NA
5	657	48.98	34	35.0	1169.6	3.57	0.84	9.10	49	0.21	100	NA	NA
6	565	31.48	37	31.0	1094.6	3.27	0.91	9.20	30	0.33	100	NA	NA
7	485	22.48	38	20.0	994.6	3.77	0.78	9.41	55	0.42	100	NA	NA
8	715	26.98	33	25.0	1019.6	2.57	0.88	9.05	38	0.47	100	0.00	0.00
9	545	35.98	32	24.0	1019.6	3.67	0.69	9.36	57	0.33	100	0.00	0.00
10	437	25.48	37	26.0	969.9	3.47	0.84	9.12	50	0.35	100	0.00	0.00
Mean	563	32.82	36	26.9	1024.6	3.48	0.82	9.10	47	0.40	100	0.00	0.00
St. Dev.	115.81	12.45	2.78	6.69	124.61	0.38	0.12	0.35	12.41	0.10	0.00	0.00	0.00
95% conf. limits (mean +/-)	68.44	7.36	1.64	3.96	73.64	0.22	0.07	0.21	7.33	0.06	0.00	0.00	0.00
Median	555	29.23	37	25.5	1019.6	3.52	0.84	9.16	50	0.40	100	0.00	0.00
Coefficient of Variability	0.21	0.38	0.08	0.25	0.12	0.11	0.14	0.04	0.27	0.26	0.00	--	--
Distribution	normal	normal	normal	normal	normal	normal	normal	normal	normal	normal	uniform	uniform	uniform

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.8: Radiator Waste Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	4250	136.5	0	17.4	20850	3230	16.9	6.95	2933	0.04	100	NA	NA
2	3350	177.0	0	13.8	24000	2446	32.4	6.99	3000	0.02	100	NA	NA
3	4200	172.5	32	14.7	20500	3473	21.0	6.25	3066	0.06	100	NA	NA
4	3321	133.3	12	14.2	21940	2694	18.1	7.01	3000	0.03	100	NA	NA
5	3289	129.8	0	15.1	22210	2902	22.3	6.85	3000	0.04	100	NA	NA
6	3510	121.5	12	18.3	22240	2907	12.2	6.50	3000	0.00	100	NA	NA
7	1900	183.0	0	13.5	22650	2282	8.9	7.61	2933	0.03	100	NA	NA
8	2510	124.5	0	13.5	22250	2364	90.1	7.38	3000	0.03	100	NA	NA
9	2987	170.1	0	14.6	21920	2899	23.8	6.98	3066	0.02	100	NA	NA
10	3466	145.0	0	15.3	21900	2821	17.5	7.11	3000	0.03	100	NA	NA
Mean	3278	149.3	5.6	15.04	22046	2801	26.3	6.96	3000	0.03	100	NA	NA
St. Dev.	704.32	23.76	10.53	1.62	952.08	374.89	23.32	0.39	44.33	0.02	0.00	NA	NA
95% conf. limits (mean +/-)	436.54	14.73	6.53	1.00	590.10	323.36	14.45	0.24	27.48	0.01	0.00	NA	NA
Median	3335	140.8	0	14.65	22075	2864	24.5	6.99	3000	0.03	100	NA	NA
Coefficient of Variability	0.21	0.16	1.88	0.11	0.04	0.13	0.89	0.06	0.01	0.52	0.00	NA	NA
Distribution	normal	normal	normal	normal	normal	normal	normal	normal	normal	normal	uniform	NA	NA

Data provided by Robert Pitt, University of Alabama

NA: Data not available

Table E2.9: Plating Bath Waste Samples

Sample #	Conductivity (µS/cm)	Fluoride (mg/L)	Hardness (mg/L) (as $CaCO_3$)	Detergent (mg/L)	Fluoresc. (% scale)	Potassium (mg/L)	Ammonia (mg/L)	pH	Color (units)	Chlorine (mg/L)	Toxicity (I25) (% reduc.)	Copper (mg/L)	Phenols (mg/L)
1	16200	9.00	1408	15.0	640.0	774	105.00	1.78	60	0.12	100	0.27	0
2	3620	1.68	950	1.8	505.0	552	74.20	4.82	90	0.27	100	0.00	0
3	8500	1.86	775	10.0	77.5	1730	3.05	5.20	368	0.01	89.4	0.00	0
4	9700	6.00	1452	9.0	225.0	186	139.37	6.15	70	0.08	100	0.21	0
5	10200	5.52	1476	11.4	390.0	220	29.33	3.36	90	0.00	100	0.32	0
6	7000	5.85	1818	1.5	88.0	490	76.00	8.60	50	0.04	68.4	0.07	0
7	8000	6.00	2433	1.6	75.0	356	58.60	7.60	50	0.03	90.5	0.05	0
8	12500	7.95	1484	6.9	510.5	380	60.90	3.10	75	0.02	100	0.35	0
9	8100	4.20	1398	3.9	147.5	1100	101.00	2.50	110	0.00	100	0.48	0
10	19700	3.20	1091	7.0	275.0	4300	9.05	6.20	75	0.19	100	0.00	0
Mean	10352	5.13	1429	6.8	293.4	1009	65.65	4.93	104	0.08	94.8	0.18	0.00
St. Dev.	4681.35	2.41	464.03	4.63	206.61	1247.85	43.37	2.25	94.71	0.09	10.15	0.17	0.00
95% conf. limits (mean +/-)	2901.53	1.49	287.61	2.87	128.06	773.42	26.88	1.39	58.70	0.06	6.29	0.11	0.00
Median	9100	5.69	1430	6.9	250.0	521	67.55	5.01	75	0.04	100	0.14	0.00
Coefficient of Variability	0.45	0.47	0.32	0.68	0.70	1.24	0.66	0.46	0.91	1.20	0.11	0.94	--
Distribution	normal	normal	normal	normal	normal	log-normal	normal	normal	normal	normal	bi-modal	uniform	uniform

Data provided by Robert Pitt, University of Alabama

APPENDIX F

ANALYTICAL PROCEDURES FOR OUTFALL MONITORING

APPENDIX F1: INDICATOR PARAMETER OVERVIEW

Ammonia

Ammonia is a good indicator of sewage, since its concentration is much higher there than in groundwater or tap water. High ammonia concentrations may also indicate liquid wastes from some industrial sites. Ammonia is relatively simple and safe to analyze. Some challenges include the tendency for ammonia to volatilize (i.e., turn into a gas and become non-conservative) and its potential generation from non-human sources, such as pets or wildlife.

Boron

Boron is an element present in the compound borax, which is often found in detergent and soap formulations. Consequently, boron is a good potential indicator for both laundry wash water and sewage. Preliminary research from Alabama supports this contention, particularly when it is combined with other detergent indicators, such as surfactants (Pitt, IDDE Project Support Material). Boron may not be a useful indicator everywhere in the country since it may be found at elevated levels in groundwater in some regions and is a common ingredient in water softeners products. Program mangers should collect data on boron concentrations in local tap water and groundwater sources to confirm whether it will be an effective indicator of illicit discharges.

Chlorine

Chlorine is used throughout the country to disinfect tap water, except where private wells provide the water supply. Chlorine concentrations in tap water tend to be significantly higher than most other discharge types. Unfortunately, chlorine is extremely volatile, and even moderate levels of organic materials can cause chlorine levels to drop below detection levels. Because chlorine is non-conservative, it is not a reliable indicator, although if very high chlorine levels are measured, it is a strong indication of a water line break, swimming pool discharge, or industrial discharge from a chlorine bleaching process.

Color

Color is a numeric computation of the color observed in a water quality sample, as measured in cobalt-platinum units (APHA, 1998). Both industrial liquid wastes and sewage tend to have elevated color values. Unfortunately, some “clean” flow types can also have high color values. Field testing by Pitt (IDDE Project Support Material) found high color values associated for all contaminated flows, but also many uncontaminated flows, which yielded numerous false positives. Overall, color may be a good first screen for problem outfalls, but needs to be supplemented by other indicator parameters.

Conductivity

Conductivity, or specific conductance, is a measure of how easily electricity can flow through a water sample. Conductivity is often strongly correlated with the total amount of dissolved material in water, known as Total Dissolved Solids. The utility of conductivity as an indicator depends on whether concentrations are elevated in “natural” or clean waters. In particular, conductivity is a poor indicator of illicit discharge in estuarine waters or in northern regions where deicing salts are used (both have high conductivity readings).

Field testing in Alabama suggests that conductivity has limited value to detect sewage or wash water (Pitt, IDDE Project Support Material). Conductivity has some

value in detecting industrial discharges that can exhibit extremely high conductivity readings. Conductivity is extremely easy to measure with field probes, so it has the potential to be a useful supplemental indicator in subwatersheds that are dominated by industrial land uses.

Detergents

Most illicit discharges have elevated concentration of detergents. Sewage and washwater discharges contain detergents used to clean clothes or dishes, whereas liquid wastes contain detergents from industrial or commercial cleansers. The nearly universal presence of detergents in illicit discharges, combined with their absence in natural waters or tap water, makes them an excellent indicator. Research has revealed three indicator parameters that measure the level of detergent or its components-- surfactants, fluorescence, and surface tension (Pitt, IDDE Project Support Material). Surfactants have been the most widely applied and transferable of the three indicators. Fluorescence and surface tension show promise, but only limited field testing has been performed on these more experimental parameters. Methods and laboratory protocols for each of the three detergent indicator parameters are reviewed in Appendix F2.

E. coli, Enterococci and Total Coliform

Each of these bacteria is found at very high concentrations in sewage compared to other flow types, and is a good indicator of sewage or septage discharges, unless pet or wildlife sources exist in the subwatershed. Overall, bacteria are good supplemental indicators and can be used to find "problem" streams or outfalls that exceed public health standards. Relatively simple analytical methods are now available to test for bacteria indicators, although they still suffer from two monitoring constraints. The first is the relatively long analysis time (18-24 hours) to get results, and the second is that the waste produced by the tests may be classified as a biohazard and require special disposal techniques.

Fluorescence

Laundry detergents are highly fluorescent because optical brighteners are added to the formula to produce "brighter whites." Optical brighteners are the reason that white clothes appear to have a bluish color when placed under a fluorescent light. Fluorescence is a very sensitive indicator of the presence of detergents in discharges, using a fluorometer to measure fluorescence at specific wavelengths of light. Since no chemicals are needed for testing, fluorometers have minimal safety and waste disposal concerns.

Some technical concerns do limit the utility of fluorescence as an indicator of illicit discharges. The concerns include the presence of fluorescence in non-illicit flow types such as irrigation water, the considerable variation of fluorescence between different detergent brands, and the lack of a readily standard or benchmark concentration for optical brighteners. For example, Pitt (IDDE Project Support Material) measured fluorescence in mg/L of Tide™ brand detergent, and found the degree of fluorescence varied regionally, temporally, and between specific detergent formulations.

Given these current limitations, fluorescence is best combined with other detergent indicators such as surfactants. Appendix F3 should be consulted for more detailed information on analytical methods and experimental field testing using fluorescence as an indicator parameter.

Fluoride

Fluoride is added to drinking water supplies in most communities to improve dental health, and normally found at a concentration of two parts per million in tapwater. Consequently, fluoride is an excellent conservative indicator of tap water discharges or leaks from water supply pipes that end up in the storm drain. Fluoride is obviously not a good indicator in communities that do not fluoridate drinking water, or where individual wells provide drinking water. One key constraint is that the reagent used in the recommended analytical method for fluoride is considered a hazardous waste, and must be disposed of properly.

Hardness

Hardness measures the positive ions dissolved in water and primarily include magnesium and calcium in natural waters, but are sometimes influenced by other metals. Field testing by Pitt (IDDE Project Support Material) suggests that hardness has limited value as an indicator parameter, except when values are extremely high or low (which may signal the presence of some liquid wastes). Hardness may be applicable in communities where hardness levels are elevated in groundwater due to karst or limestone terrain. In these regions, hardness can help distinguish natural groundwater flows present in outfalls from tap water and other flow types.

pH

Most discharge flow types are neutral, having a pH value around 7, although groundwater concentrations can be somewhat variable. pH is a reasonably good indicator for liquid wastes from industries, which can have very high or low pH (ranging from 3 to 12). The pH of residential wash water tends to be rather basic (pH of 8 or 9). The pH of a discharge is very simple to monitor in the field with low cost test strips or probes. Although pH data is often not conclusive by itself, it can identify problem outfalls that merit follow-up investigations using more effective indicators.

Potassium

Potassium is found at relatively high concentrations in sewage, and extremely high concentrations in many industrial process waters. Consequently, potassium can act as a good first screen for industrial wastes, and can also be used in combination with ammonia to distinguish wash waters from sanitary wastes. (See Chapter 12). Simple field probes can detect potassium at relatively high concentrations (5 mg/L), whereas more complex colorimetric tests are needed to detect potassium concentrations lower than 5 mg/L.

Surface Tension

Surfactants remove dirt particles by reducing the surface tension of the bubbles formed in laundry water when it is agitated. Reduced surface tension makes dirt particles less likely to settle on a solid surface (e.g., clothes or dishes) and become suspended instead on the water's surface. The visible manifestation of reduced surface tension is the formation of foam or bubbles on the water surface. Pitt (IDDE Project Support Material) tested a very simple procedure to measure surface tension that quantifies the formation of foam and bubbles in sample bottles. Initial laboratory tests suggest that surface tension is a good indicator of surfactants, but only when they are present at relatively high concentrations. Section F3 provides a more detailed description of the surface tension measurement procedure.

Surfactants

Surfactants are the active ingredient in most commercial detergents, and are typically measured as Methyl Blue Active Substances (or MBAS). They are a synthetic replacement for soap, which builds up deposits on clothing over time. Since surfactants are not found in nature, but are always present in detergents, they are excellent indicators of sewage and wash waters. The presence of surfactants in cleansers, emulsifiers and lubricants also makes them an excellent indicator of industrial or commercial liquid wastes. In fact, research by Pitt (IDDE Project Support Material) found that detergents were an excellent indicator of "contaminated" discharges in Alabama (i.e., discharges that were not tap water or groundwater). Several analytical methods are available to monitor surfactants. Unfortunately, the reagents used involve toluene, chloroform, or benzene, each of which is considered hazardous waste with a potential human health risk. The most common analysis method uses chloroform as a reagent, and is recommended because it is relatively safer when compared to other reagents.

Turbidity

Turbidity is a quantitative measure of cloudiness in water, and is normally measured with a simple field probe. While turbidity itself cannot always distinguish between contaminated flow types, it is a potentially useful screening indicator to determine if the discharge is contaminated (i.e., not composed of tap water or groundwater).

Research Indicators

In recent years, researchers have explored a series of other indicators to identify illicit discharges, including fecal steroids (such as coprostanol), caffeine, specific fragrances associated with detergents and stable isotopes of oxygen. Each of these research indicators is profiled in Pitt (IDDE Project Support Material) and summarized below in Table F1. Most research indicators require sophisticated equipment and specific expertise that limit their utility as a general indicator, given the high sampling cost and long turn-around times needed. To date, field tests of research indicators have yielded mixed results, and they are currently thought to be more appropriate for special research projects than for routine outfall testing. While they are not discussed further in this manual, future research and testing may improve their utility as indicators of illicit discharges.

Table F1: Summary of Research Indicators Used for Identifying Inappropriate Discharges into Storm Drainage		
Parameter Group	**Comments**	**Recommendation**
Coprostanol and other fecal sterol compounds	Used to indicate presence of sanitary sewage	Possibly useful. Expensive analysis with GC/MSD. Not specific to human wastes or recent contamination. Most useful when analyzing particulate fractions of wastewaters or sediments.
Specific detergent compounds (LAS, fabric whiteners, and perfumes)	Used to indicate presence of sanitary sewage	Possibly useful. Expensive analyses with HPLC. A good and sensitive confirmatory method.
Pharmaceuticals (colfibric acid, aspirin, ibuprofen, steroids, illegal drugs, etc.)	Used to indicate presence of sanitary sewage	Possibly useful. Expensive analyses with HPLC. A good and sensitive confirmatory method.
Caffeine	Used to indicate presence of sanitary sewage	Not very useful. Expensive analyses with GC/MSD. Numerous false negatives, as typical analytical methods not suitably sensitive.
DNA profiling of microorganisms	Used to identify sources of microorganisms	Likely useful, but currently requires extensive background information on likely sources in drainage. Could be very useful if method can be simplified, but with less specific results.
UV absorbance at 228 nm	Used to identify presence of sanitary sewage	Possibly useful, if UV spectrophotometer available. Simple and direct analyses. Sensitive to varying levels of sanitary sewage, but may not be useful with dilute solutions. Further testing needed to investigate sensitivity in field trials.
Stable isotopes of oxygen	Used to identify major sources of water	May be useful in area having distant domestic water sources and distant groundwater recharge areas. Expensive and time consuming procedure. Can not distinguish between wastewaters if all have common source.
GC/MSD - Gas Chromatography/Mass Selective Detector HPLC - High Performance Liquid Chromatography		

Appendix F2: "Off-the Shelf" Analytical Methodologies

F2.1 AMMONIA (0 TO 0.50 MG/L NH_3-N)

Equipment/Supplies Needed

- Hach bench top or portable spectrophotometer or colorimeter (see ordering information below)
- ammonia nitrogen reagent set for 25-mL samples
- ammonia nitrogen standard solution

Procedure

Refer to Hach method 8155 for Nitrogen, Ammonia Salicylate Method (0 to 0.50 mg/L NH_3-N) for a 25mL sample. In this method, ammonia compounds combine with chlorine to form monochloramine. Monochloramine reacts with salicylate to form 5-aminosalicylate. The 5-aminosalicylate is oxidized in the presence of sodium nitroprusside catalyst to form a blue-colored compound. The blue color is masked by the yellow color from the excess reagent present to give a final green-colored solution.

Duration of Test for Each Sample

Because of the duration of this test, samples should be run in batches of about six. From start to finish, each batch of six samples takes about 25 minutes, including the time taken to clean the sample cells and reset the instrument between each batch.

Hazardous Reagents

According to good laboratory practice, the contents of each sample cell, after the analysis, should be poured into another properly-labeled container for proper disposal.

Ease of Analysis

This procedure is time-consuming and should be performed indoors.

Ordering Information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

[Note: The direct-Nessler method may be preferred due to its faster reaction times, but Nessler reagent is toxic and corrosive. Nessler reagent, according to its MSDS, causes severe burns, is an acute and a cumulative poison, and is a teratogen. It also contains from 5 to 10% mercuric iodide. It is now recommended that the more sensitive salicylate method because of the lower concentrations experienced in this research, and because of its lower toxicity and easier disposal requirements. The salicylate method was therefore used for this project, although prior research found it to be somewhat less satisfactory than the Nessler method.]

Equipment/Supplies Needed for Ammonia Analysis		
Item (Catalog Number)	**Quantity**	**Price**
One of the colorimeters, or spectrophotometers, listed previously will be needed. Alternatively, a dedicated colorimeter can be used, but that will only be useable for a single analyte.		
Ammonia-Nitrogen Reagent Set (25mL test) salicylate method (2243700)	1 set of 100 tests	$180.56
Ammonia cyanurate reagent powder pillows (2395566)	1 pk of 50 pillows	$ 20.20
Ammonia salicylate reagent powder pillows (2395366)	1 pk of 50 pillows	$ 25.55

F2.2 BORON (Low range 0 to 1.50 mg/L as B)

Equipment/Supplies Needed

- A Hach bench top or portable spectrophotometer or colorimeter (see ordering information below)
- Boron test kit
- 1-inch plastic sample cells (at least 2).

Procedure

Refer to Hach Azomethine-H Method 10061, which is adapted from ISO method 9390. In this procedure, Azomethine-H, a Schiff base, is formed by the condensation of an aminonaphthol with an aldehyde by the catalytic action of boron. The boron concentration in the sample is proportional to the developed color. Follow the Hach instructions that come with the reagent set for the specific procedure.

Duration of Test for Each Sample

Each batch of six samples takes approximately 20 minutes.

Hazardous Reagents

Standard laboratory practice requires that all unwanted chemicals be properly disposed.

Ease of Analysis

The procedure is a little time consuming, but several samples can be analyzed together.

Ordering information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

Equipment/Supplies Needed for Boron Analysis		
Item (Catalog Number)	**Quantity**	**Price***
Boron Test Kit (0-1.5 mg/L) BoroTrace (Azomethine-H) Method (2666900)	1 set of 100 tests	$50.00
BoroTrace 2 reagent (2666669)	1 pk of 100 pillows	$30.00
BoroTrace 3 reagent (2666799)	1 pk of 100 pillows	$20.65
EDTA Solution 1M (2241925)	50 mL	
DR/890 portable colorimeter Programmed with 90 tests. Includes 2 sample cells, COD & TnT tube adapter, instrument, procedure manual and batteries. Portable instrument that can be used for many different analytes, but fewer than the following instruments. (48470000)[1]	1	$929.00
DR/2500 spectrophotometer includes 6 one-inch round sample cells, instrument and procedure manual, and DR/Check Absorbance Standards. Compact laboratory instrument having many capabilities. (5900000)[1]	1	$2200.00
DR/2400 portable spectrophotometer includes one-inch sample cells, instrument and procedures manuals. Portable instrument having many capabilities. (5940000)[1]	1	$1,995.00
DR/4000 V Spectrophotometer. Visible spectrum only (320 to 1100nm). Includes 1-inch matched sample cells/ AccuVacc and 16-mm vial adapters; a Single Cell Module; 1-inch and 1-cm cell adapters; dust cover; replacement lamp kit; an illustrated manual set; and a power cord. UV-Vis laboratory instrument having vast capabilities. (48100-00)[1]	1	$5500.00
[1]*Only one spectrophotometer is needed* **The per-sample expendable cost is therefore about $2.00.*		

F2.3 COLOR (0 – 100 APHA Platinum Cobalt Units)

Equipment/Supplies needed

One Hach color test kit Model CO-1 which measures color using a color disc for comparison.

Procedure

The following procedure is described in the test kit.

Low Range

1. Place the lengthwise viewing adapter in the comparator.
2. fill one sample tube to the line underlining "Cat. 1730-00" with the sample. This will be approximately 15mL. If not using 1730-00 tubes, fill to the line founds at approximately 3 inches up from the bottom of the tube.
3. Place the tube containing the water sample into the comparator in the right-hand position.
4. Fill the other sample tube with colorless water to the line underlining "Cat. 1730-00." Insert this tube in the left-side comparator opening.
5. Hold the comparator with the tube tops pointing to a window or light source at approximately a 45 degree angle (with the light coming in through the top of the tubes). View through the openings in the front of the comparator. When viewing, use care to not spill samples from unstoppered tubes.
6. Rotate the disc until a color match is obtained. The reading obtained through the scale window is the apparent color in APHA Platinum Cobalt Units.

High Range

1. If the lengthwise viewing adapter is in place, remove it.
2. Fill one of the tubes to the 5mL mark with the water sample.
3. Insert the tube in the right top opening of the comparator.
4. Fill the other tube to the 5mL mark with clear water and insert this tube into the left opening of the comparator.
5. Hold the comparator up to a light source as explained above. The reading obtained through the scale window is multiplied by 5 to obtained the apparent color.

Duration of Test for Each Sample

One minute

Hazardous Reagents

None.

Ease of Analysis

This procedure easy and fast and can be performed outside of the laboratory.

Ordering Information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

Equipment/Supplies Needed for Color Analysis		
Item (Catalog Number)	**Quantity**	**Price**
Color Test Kit (0-100 mg/L) (223400)	one kit	$51.50

F2.4 CONDUCTIVITY

Equipment/Supplies Needed

- Cardy pocket-sized conductivity meter model B-173 made by Horiba
- Conductivity standard that comes with the meter.

Calibration

Before any measurements can be performed the instrument must first be calibrated. The meter should hold its calibration for an extended period, but it is best to check the calibration before each sample batch.

1. Press the POWER button.
2. Place a drop of the 1.41 µs/cm standard solution onto the sensor cell.
3. Press the CAL/MODE button to display the CAL mark and 1.41. Calibration is complete when the CAL mark disappears.
4. Wash the sensor with tap water, and dry with a tissue.

Measurement

1. Check first to see which mode the instrument is in by looking for the arrow pointing at the mS/cm or µS/cm.
2. Add a drop of the sample onto the sensor cell using a pipette (or the sensor may be immersed into the sample).
3. When the smiley face ☺ appears, take a reading. Be sure to note the units.

Duration of Test for Each Sample

1 minute

Hazardous Reagents

None

Ease of Analysis

Simple and fast. Can be used in the field.

Ordering Information

Vendor: Cole-Parmer Instrument Company
625 East bunker Court
Vernon Hills, IL 60061-1844
Phone: 1-800-323-4340
FAX: 847-247-2929
Website: www.coleparmer.com

Equipment/Supplies Needed for Conductivity Analysis	
Item (Catalog Number)	**Price**
Cardy pocket-sized conductivity meter and accessories (EW-05751-10)	$269.00
Replacement cardy conductivity sensor cartridge (EW-05751-52)	$ 82.00
Replacement cardy conductivity solution kit (EW-05751-70)	$ 43.00

F2.5 DETERGENTS (0-3 ppm)

Equipment/Supplies needed

- Detergents (anionic surfactants) kit from *CHEMetrics*.

Procedure

The following procedure comes with the Detergents kit. The Detergents CHEMets® test employs the methylene blue extraction method. Anionic detergents react with methylene blue to form a blue complex that is extracted into an immiscible organic solvent. The intensity of the blue color is directly related to the concentration of "methylene blue active substances (MBAS)" in the sample. Anionic detergents are one of the most prominent methylene blue active substances. Test results are expressed in mg/L linear alkylbenzene sulfonate.

1. Rinse the reaction tube with sample, and then fill it to the 5 mL mark with sample.
2. While holding the double-tipped ampoule in a vertical position, snap the upper tip using the tip-breaking tool.
3. Invert the ampoule and position the open end over the reaction tube. Snap the upper tip and allow the contents to drain into the reaction tube.
4. Cap the reaction tube and shake it vigorously for 30 seconds. Allow the tube to stand undisturbed for approximately 1 minute.
5. Make sure that the flexible tubing is firmly attached to the CHEMet ampoule tip.
6. Insert the CHEMet assembly (tubing first) into the reaction tube making sure that the end of the flexible tubing is at the bottom of the tube. Break the tip of the CHEMet ampoule by gently pressing it against the side of the reaction tube. The ampoule should draw in fluid only from the organic phase (bottom layer).
7. When filling is complete, remove the CHEMet assembly from the reaction tube.
8. Invert the ampoule several times, allowing the bubble to travel from end to end each time.
9. Using a tissue, remove the tubing from the ampoule tip. Wipe all liquid from the exterior of the ampoule, then place a small white cap firmly onto the tip of the ampoule.
10. Place the CHEMet ampoule, flat end downward into the center tube of the comparator. Direct the top of the comparator up toward a source of bright light while viewing from the bottom. Rotate the comparator until the color standard below the CHEMet ampoule shows the closest match. If the color of the CHEMet ampoule is between two color standards, a concentration estimate can be made.

Duration of Test for Each Sample

Approximately 7 minutes per sample.

Hazardous Reagents

The main components of the double-tipped ampoule are considered hazardous, and possibly carcinogenic (contains chloroform). The used ampoule should be placed back in the test kit box for later disposal at a hazardous waste facility. Use proper safety protection when performing this test: laboratory coat, gloves, and safety glasses. It is also strongly recommended that the test be performed under a laboratory fume hood. Wash hands thoroughly after handling the kit.

Ease of Analysis

This procedure may be performed outside of a standard laboratory, if well ventilated. Produces hazardous chemicals.

Ordering Information

Vendor: *CHEMetrics*, Inc
4295 Catlett Rd
Calverton, VA 20138
Phone 1-800-356-3072
FAX 1-540-788-4856
Website: www.chemetrics.com

Equipment/Supplies Needed for Detergents Analysis		
Item (Catalog Number)	**Quantity**	**Price***
Detergent kit (anionic surfactants) (K-9400)	20 tests	$63.15
Detergent kit refill (R-9400)	20 tests	$50.45
**The per-sample expendable cost is therefore $2.52.*		

F2.6 *E. COLI*

Equipment/Supplies Needed

- Colilert reagent, sterile sample bottles for 100 mL samples
- Quanti-Tray 2000
- Colilert comparator predispensed in a Quanti-Tray/2000incubator
- UV light from IDEXX.

Enumeration Procedure

1. Add contents of one Colilert snap pack to a 100 mL room temperature water sample in a sterile vessel. The standard Colilert reagent is recommended when evaluating Enterococci simultaneously so the samples are both ready to read in 24 hours. If only *E. coli* are to be evaluated, then the faster Colilert-18 reagent can be used if reading the results in 18 hours instead of 24 hours is important.
2. Cap vessel and shake until dissolved.
3. Pour sample/reagent mixture into a Quanti-Tray/2000 and seal in an IDEXX Quanti-Tray Sealer.
4. Place the sealed tray in a 35±0.5^{o} C incubator for 24 hours.
5. Read results according to the Results Interpretation table below. Count the number of positive wells and refer to the MPN table provided with the Quanti-Trays to obtain a Most Probable Number.

Results Interpretation

Appearance	Result
Less yellow than the comparator	Negative for total coliforms and *E. coli*
Yellow equal to or greater than the comparator	Positive for total coliforms
Yellow and fluorescence equal to or greater than the comparator	Positive for *E. coli*

Duration of Test for Each Sample

Once the Quanti-Tray sealer is warm (10 min), it takes approximately 5 minutes per sample to label, seal and incubate the Quanti-Tray. After 24 hours, it takes 1-2 minutes to read the sample results under the UV lamp.

Hazardous Reagents

Used Quanti-Trays must be disposed of in a biohazard bag and handled by appropriate biohazard disposal facility, using similar practices as for alternative bacteria analysis methods.

Ease of Analysis

Not a difficult procedure to learn. Knowledge of proper handling of bacterial specimens is necessary. Cannot be performed in the field.

Ordering information

Vendor: IDEXX
1 IDEXX Drive
Westbrook, ME 04092
Phone: 1-800-321-0207
Fax: 207-856-0630
E-mail: water@idexx.com
Website: www.idexx.com/water

Equipment/Supplies Needed for *E. coli* Analysis		
Item (Catalog Number)[1]	**Quantity**	**Price***
Colilert reagent for 100mL sample (WP200)	200-pack	$1,020.00
120mL vessel with 100mL line, sodium thiosulfate & label (WV120ST-200)	200-pack	$90.00
97-well sterile Quanti-Tray/2000 trays (WQT-2K)	100-pack	$110.00
Quality control kit (E. coli, Klebsiela, Pseudomonas A). (WKT 1001)	n/a	$120.00
Colilert comparator predispensed in a Quanti-Tray/2000 (WQT2KC)	1	$6.00
Quanti-Tray Sealer (115V) with 51-well rubber insert (WQTS2X-115)	1	$3,500.00
6 watt UV lamp 110 volt (WL160)	1	$89.00
Incubator 120V, 30-65°C, 14"x14"x14" (WI300)	2	$389.00

[1] See the Enterococci table above for equipment that can be shared when conducting both analyses.
**The per-sample expendable cost (reagent, bottle, and tray) is about $6.65.*

F2.7 ENTEROCOCCI

Equipment/Supplies Needed

- Enterolert reagent
- Sterile sample bottles for 100 mL samples
- Quanti-Tray 2000
- Incubator
- UV light from IDEXX

Enumeration Test Procedure

1. Carefully separate a Snap Pack from its strip, taking care not to accidentally open the next pack.
2. Tap the reagent snap pack to ensure that all of the Enterolert powder is in the bottom part of the pack.
3. Open the pack by snapping back the top at the score line. Caution: Do not touch the opening of the pack.
4. Add the reagent to a 100 mL water sample in a sterile bottle.
5. Aseptically cap and seal the vessel.
6. Shake to completely dissolve reagent.
7. Pour the sample/reagent mixture into a Quanti-Tray avoiding contact with the foil pull tab. Seal the tray according to Quanti-Tray instructions.
8. Incubate for 24 hours at $41^{o}\pm5^{o}$ C.
9. Read the results at 24 hours by placing a 6 watt, 365 nm wavelength UV light within five inches of the Quanti-Tray in a dark environment. Be sure the light is facing away from your eyes and toward the Quanti-Tray. Count the number of fluorescent Quanti-Tray wells. The fluorescence intensity of positive wells may vary.
10. Refer to the MPN table provided with the Quanti-Tray to determine the Most Probable Number of Enterococci in your sample.

Procedural Notes

If the sample is inadvertently incubated over 28 hours without observation, the following guidelines apply:

- Lack of fluorescence after 28 hours is a valid negative test
- Fluorescence after 28 hours is an invalid result
- Use sterile water, not buffered water for making dilutions. Enterolert is already buffered. Always add Enterolert to the proper volume of diluted sample after making dilutions.
- For comparison, a water blank can be used when interpreting results.

Duration of Test for Each Sample

Once the Quanti-Tray sealer is warm (10 min), it takes approximately 5 minutes per sample to mix, label, seal and place the Quanti-Tray in the incubator. After 24 hours, it takes 1-2 minutes to read the sample results under the UV lamp.

Hazardous Reagents

Used Quanti-Trays must be disposed of in a biohazard bag and handled by appropriate biohazard disposal facility, just like any other bacteria analysis materials.

Ease of Analysis

Not difficult procedure to learn. Knowledge of proper handling of bacterial specimens is necessary. Cannot be performed in the field.

Ordering information

Vendor: IDEXX
1 IDEXX Drive
Westbrook, ME 04092
Phone: 1-800-321-0207
Fax: 207-856-0630
E-mail: water@idexx.com
Website: www.idexx.com/water

Equipment/Supplies Needed for Enterococci Analysis		
Item (Catalog Number)	**Quantity**	**Price***
Enteroletert reagent for 100 mL samples (WENT200)	200-pack	$ 1,020.00
120 mL pre-sterilized vessel with 100 mL line, sodium thiosulfate & label (WV120ST-200)[1]	200-pack	$ 90.00
97-well sterile Quanti-Tray/2000 trays (WQT-2K) [1]	100-pack	$ 110.00
Quality control kit (E. coli, Klebsiela, Pseudomonas A). (WKT 1001)	n/a	$ 120.00
Quanti-Tray Sealer (115V) with 51-well rubber insert (WQTS2X-115) [1]	1	$ 3,500.00
6 watt UV lamp 110 volt (WL160) [2]	1	$ 89.00
Incubator 120V, 30-65°C, 14"x14"x14" (WI300) [3]	2	$ 389.00

[1] Same expendable materials as for the E. coli method, additional should be ordered for each method
[2] Same as for the E. coli method and can be shared
[3] Although the same, a second incubator is needed for the E. coli method because of the different temperature settings and the normal need to evaluate Enterococci and E. coli simultaneously
** The per-sample expendable cost (reagent, bottle, and tray) is about $6.65.*

F2.8 FLUORIDE (0 TO 2.00 MG/L F^-)

Equipment/Supplies Needed

- Hach bench top or portable spectrophotometer or colorimeter (see ordering information below)
- AccuVac Vial Adaptor (for older spectrophotometers)
- SPADNS Fluoride Reagent AccuVac Ampuls.

Procedure

Refer to Hach SPADNS Method 8029 which is adapted from Standard Methods for the Examination of Water and Wastewater. This procedure involves the reaction of fluoride with a red zirconium-dye solution. The fluoride combines with part of the zirconium to form a colorless complex, thus bleaching the red color in an amount proportional to the fluoride concentration.

Duration of Test for Each Sample

Each samples takes an average of 3 minutes to test.

Hazardous Reagents

The SPANDS reagent is a hazardous solution. The used AccuVacs should be placed back in the Styrofoam shipping container for storage and then disposed properly through a hazardous waste disposal company.

Ease of Analysis

The procedure is relatively easy and fast and can be performed in the field using a portable spectrophotometer or colorimeter. However, as for all tests, it is recommended that the analyses be conducted in a laboratory, or at least in a work room having good lighting and water.

Ordering information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

Equipment/Supplies Needed for Fluoride Analysis	
Item (Catalog Number)	**Price**
Fluoride Reagent (SPADNS) AccuVac Ampuls [1 set of 25 AccuVacs (2 needed per test)] (2506025)	$ 17.00
Adapter, AccuVac vial (needed for older spectrophotometers DR/2000 and DR/3000) (43784-00)	$ 5.40
DR/890 portable colorimeter programmed with 90 tests. Includes 2 sample cells, COD & TnT tube adapter, instrument, procedure manual and batteries. Portable instrument that can be used for many different analytes, but fewer than the following instruments. (48470000) [1]	$ 929.00
DR/2500 spectrophotometer includes 6 one-inch round sample cells, instrument and procedure manual, and DR/Check Absorbance Standards. Compact laboratory instrument having many capabilities. (5900000) [1]	$ 2,200.00
DR/2400 portable spectrophotometer includes one-inch sample cells, instrument and procedures manuals. Portable instrument having many capabilities. (5940000) [1]	$ 1,995.00
DR/4000 V Spectrophotometer. Visible spectrum only (320 to 1100nm). Includes 1-inch matched sample cells/ AccuVacc and 16-mm vial adapters; a Single Cell Module; 1-inch and 1-cm cell adapters; dust cover; replacement lamp kit; an illustrated manual set; and a power cord. UV-Vis laboratory instrument having vast capabilities. (48100-00) [1]	$ 5,500.00
[1] only one spectrophotometer is needed **The per-sample expendable cost is about $1.36.*	

F2.9 pH

Equipment/Supplies Needed

- Cardy pocket-sized pH meter model B-213 made by Horiba
- pH standards that come with the meter.

Calibration

The meter should hold its calibration for an extended period, but it is best to check the calibration before each sample batch.

1. Press the ON/OFF button.
2. Place approximately 1 mL of the yellow pH 7.0 standard solution onto the sensor cell (be careful not to touch the sensor with the dropper or pipette, the cell is covered with a very thin and fragile glass cover slip).
3. Press the CAL button to display the black CAL mark in the upper right corner and 7.0.
4. Calibration is complete when the CAL mark disappears. Wash the sensor with tap or distilled water and dry with a tissue.
5. Press CAL again so that 4.01 and CAL are displayed to calibrate using the pink pH 4.01 buffer. Follow the same procedure as above.

Measurement

1. Place a drop of the sample water onto the sensor cell (usually around 1 mL). Alternatively, you may dip the meter into the water to be tested.
2. When the smiley face ☺ appears, read the number.
3. Press the ON/OFF button to turn the power OFF.
4. Wash the sensor with tap water or distilled water. Wipe off any residual water on the sensor with a tissue.
5. Be sure the protective cap is covering the sensor and put the pH meter back in its protective case.

Duration of Test for Each Sample

Calibration takes around 3 minutes, and testing of each sample is only about 30 seconds.

Hazardous Reagents

None

Ease of Analysis

Simple and fast. Can be used in the field.

Ordering Information

Vendor: Cole-Parmer Instrument Co.
625 East Bunker Court
Vernon Hills, IL 60061-1844
Phone: 1-800-323-4340
FAX: 847-247-2929
Website: www.coleparmer.com

Equipment/Supplies Needed for pH Analysis	
Item (Catalog Number)	**Price**
Cardy twin pH meter and accessories (EW-05759-00)	$238.00
Replacement pH sensor cartridge (EW-05759-0)	$105.00
Replacement pH solution kit (EW-05751-70)	$ 29.00

F2.10 POTASSIUM

Equipment/Supplies Needed

- Cardy potassium compact meter by Horiba model C-131
- Accessories that come with the meter.

Two-Point Calibration (Monthly)

1. Turn the power ON
2. Open the sensor cover and wipe the sensor pad clean with a piece of tissue and deionized water, then wipe it dry with a piece of tissue. Repeat this several times.
3. Place a piece of sampling sheet onto the sensor pad, and drip 2 to 5 drops of the standard STD solution onto it (or drip the solution directly onto the sensor pad).
4. After the readout has stabilized, adjust the STD dial so that the display reads 20X100. After cleaning the sensor according to step (2), follow the same procedure using the standards SLOPE solution and after the readout has stabilized, adjust slope volume so that the display reads 15X10.
5. After cleaning several times with deionized water, measure the standard STD solution again.
6. Recalibrate if the reading is not (20±2)X100.
7. Wipe the sensor pad with deionized water, then wipe it dry.

One-Point Calibration (Daily)

1. Turn the power ON.
2. Open the sensor cover, and wipe the sensor pad clean with deionized water, then wipe it dry.
3. Repeat this procedure several times.
4. Place a piece of sampling sheet onto the sensor pad, and drip 2 to 5 drops of the standard STD solution on it (or drip the solution directly onto the sensor pad).
5. After the readout has stabilized, adjust the STD dial so that the display reads 20X100.
6. Wipe the sensor pad with deionized water, and then wipe it dry.
7. If the sample is below 500 ppm (mg/L), use the SLOPE solution and adjust the STD dial to read 15X10.

Measurement

1. Place the sample directly onto the sensor pad or measurement can be aided by placing the sample onto a piece of sampling sheet.
2. Read the concentration directly from the display.
3. Clean the sensor with deionized water and wipe it clean after each sample is analyzed.
4. When finished with all samples, turn the power OFF.
5. Clean the surface of the sensor pad with deionized water and wipe dry for storage.

Duration of Test for Each Sample

Calibration takes around 5 minutes and testing of each sample is only 30 seconds.

Hazardous Reagents

None

Ease of Analysis

Simple and fast. Can be used in the field.

Ordering information

Vendor: Cole-Parmer Instrument Company
625 East Bunker Court
Vernon Hills, IL 60061-1844
Phone: 1-800-323-4340
FAX: 847-247-2929
Website: www.coleparmer.com

Equipment/Supplies Needed for pH Analysis	
Item (Catalog Number)	**Price**
Cardy potassium compact meter and accessories (EW-05755-00)	$239.00
Replacement cardy potassium sensor cartridge (EW-05755-500)	$ 64.00
Replacement cardy potassium solution kit (EW-05755-60)	$ 33.00

Note: This procedure is rapid and inexpensive, however, it only has a detection limit of about 1 mg/L, and reads in increments of 1 mg/L. This level of precision is not typically a problem for moderately contaminated samples (when the results are most useful); however, it presents challenges when used for cleaner water. Specifically, since the Flow Chart Method relies on the ammonia to potassium ratio to distinguish between washwaters and sanitary wastewaters, a "non detect" (i.e., <1) potassium concentration results in an indeterminant ratio value. Where clean water is being analyzed and more sensitive potassium values are needed, the only real option is to use other laboratory methods (either ICP or atomic absorption). Other simple field procedures (such as the method supplied by HACH) rely on a photometric measurement of a floc and are not very repeatable for these types of samples.

F2.11 TOTAL HARDNESS (10 – 4000 mg/L as CaCO3)

Equipment/Supplies Needed

- Hach digital titrator
- Total hardness titration cartridge
- ManVer 2 hardness indicator
- Hardness 1 buffer solution.

Procedure

Refer to Hach Method 8213 for Hardness, Total (10-4000 mg/L as $CaCO_3$) digital titrator method using EDTA. This procedure involves buffering the sample first to pH 10.1, adding of the ManVer 2 Hardness Indicator, which forms a red complex with a portion of the calcium and magnesium in the sample, and then titrating with EDTA. The EDTA titrant reacts first with the free calcium and magnesium ions, then with those bound to the indicator, causing it to change to a blue color at the end point.

Duration of Test for Each Sample

Approximately 5 minutes.

Hazardous Reagents

The mixture of sample, buffer solution, hardness indicator, and EDTA must be stored properly in a labeled container until disposal by a hazardous waste disposal facility.

Ease of Analysis

This procedure is not recommended to be performed in the field. Produces hazardous chemicals.

Ordering information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

Equipment/Supplies Needed for Total Hardness Analysis		
Item (Catalog Number)	**Quantity**	**Price***
Digital Titrator with plastic case, manual and 5 straight delivery tubes (1690001)	1 titrator	$105.00
Total hardness titration cartridge (EDTA 0.0800M) (1436401)	1	$10.70
Total hardness titration cartridge (EDTA 0.800M) (1439901)	1	$10.70
Delivery tube, (straight with J hook) for titration (1720500)	Pack of 5	$4.85
ManVer 2 Hardness Indicator Powder Pillow (85199)	1 pack of 100 pillows	$9.85
Hardness 1 buffer solution (42432)	One 100 mL bottle	$8.40
**The per sample expendable cost is about $0.25, depending on the hardness level.*		

F2.12 TURBIDITY

Equipment/Supplies Needed

- Benchtop or portable turbidimeter. The range of readings in NTU will depend upon the instrument.

Procedure

(This is a general procedure for turbidity. Follow your turbidimeter's instructions):

1. First, the instrument must be calibrated using the standards supplied with the instrument. If calibration is satisfactory, continue with sample measurement.
2. Samples are normally stored under refrigeration. Before analyzing for turbidity, the samples must first be brought back to room temperature. This is done to prevent the formation of frost on the outside of the glass sample cells used in the turbidity measurement.
3. Pour the sample into a sample cell (until almost full or to the fill line), cap the cell, then turn it upside down 2 to 3 times for mixing. Do not shake vigorously.
4. Keep the sample cell vertical for 4-5 seconds and wipe the outside to remove fingerprints.
5. Place the cell into the turbidity meter and take a reading.

Duration of test for each sample

Approximately one minute. This does not include the time spent bringing the sample to room temperature.

Hazardous Reagent

None

Ease of Analysis

Relatively simple and may be performed outside of the laboratory using a portable turbidimeter.

Ordering Information

Vendor: Hach Company
PO Box 389
Loveland, CO 80539-0389
Tel: 800-227-4224
Fax: 970-669-2932
Website: www.hach.com

Equipment/Supplies Needed for Turbidity Analysis		
Item (Catalog Number)	**Quantity**	**Price**
2100P Portable Turbidimeter range 1-1000 NTU Includes nine sample cells, primary standards, silicone oil & oiling cloth, manual, quick reference card and case. (4650000)	1	$837.00

Appendix F3. METHODOLOGIES AND LAB TESTING OF TECHNIQUES TO MEASURE DETERGENTS

F3.1 *CHEMETRICS* DETERGENT TEST KIT

Detergents were measured using the *CHEMetrics* detergent test kit, which detects Methylene Blue Active Substances (MBAS), an important ingredient of detergent products. The minimum detection limit (MDL) of the kit is 0.25mg/L. This is a very simple test, but the accuracy of the tests depends on the analyst's skill with the color comparator. One of the problems with this method is the upper limit of 3 mg/L. Higher values can only be measured with dilution of the sample prior to analysis. This extra step requires extra time when measuring laundry, carwash and sewage samples, when the detergent values are in hundreds of mg/L.

This kit also contains chloroform, an expected carcinogen. Great care must therefore be taken when conducting this analysis and when handling the kit materials. The alternative detergent field test kit from HACH uses much larger quantities of benzene, also a known carcinogen, and is not as well contained as the chloroform in this preferred kit. An important aspect of this research was investigating alternative analytes that could be used instead of detergents.

The main components of the *CHEMetrics* detergent test kit (Figure F3.1) are:

1. Test tube
2. Comparator device
3. Snapper
4. Double tipped ampoule containing chloroform and other reagents (blue stained)
5. CHEMets ampoule (empty vacuum ampoule)

Figure F3.1: *CHEMetrics* detergent test kit components

Test Procedure Summary

This test should preferably be conducted in a laboratory fume hood due to the possibility of exposure to chloroform.

1. Pour 5 mL of the sample into the test tube.
2. Snap one tip of the double tipped ampoule, keeping the other tip inside the tube, but above the sample level. Invert the snapped tip into the tube and snap the other tip of the ampoule. Let the blue chemical (containing chloroform) completely empty into the test tube.
3. Cap the tube tightly and shake the solution for 30 seconds. Keep the solution undisturbed for 1 minute in a test tube rack.
4. Remove the cap from the tube and insert the vacuum CHEMets ampoule into the test tube. Care must be taken so that the small plastic tube at the tip of the ampoule touches the bottom of the tube.
5. Snap the CHEMets ampoule tip by the side of the test tube and let the solution flow through the tube into the CHEMets ampoule.
6. Take off the plastic tube and wipe off the tip of the ampoule. Put the provided white cap on the tip of the ampoule and place it in the color comparator.
7. Compare the color of the solution inside the ampoule with the color comparator. The colors range from light blue (0.25 mg/L) to dark blue (3 mg/L). If the color is darker than the given colors in the comparator, the sample needs to be diluted and retested. No color indicates <0.25 mg/L value for detergents. The test tube needs to be disposed of carefully because it contains a hazardous chemical (chloroform).

Harmful Chemicals in *CHEMetrics* Detergent Test Kit

The main components of the double tipped ampoule are methylene blue, sulfuric acid, sodium phosphate, water and chloroform. Chloroform may affect the liver, kidney and central nervous system, and is a known carcinogen. On exposure, it causes irritation to eyes, skin and mucous membranes. It may also cause burning of the throat, mouth esophagus and stomach. It may also cause nausea, vomiting and diarrhea. Wash your hands thoroughly after handling the kit and conduct the analysis in a well-ventilated area, preferably in a laboratory fume hood. Avoid contact with the eyes. Safety glasses and gloves are required while doing this test. If there is a spill, take up with an absorbent material. Keep the reagents in the ampoule for final disposal, in accordance with regulations.

F3.2 Fluorescence Monitoring using the GFL-1 Fluorometer

Introduction

Fluorescence is the property of the whiteners in detergents that cause treated fabrics to fluoresce in the presence of ultraviolet rays, giving laundered materials an impression of extra cleanliness. These are also referred to as bluing, brighteners or optical brighteners and have been an important ingredient of most laundry detergents for many years. The effectiveness of the brighteners varies by the concentration of the detergents in the wash water. The detection of optical brighteners has been used as an indicator for the presence of laundry wastewater, and municipal sewage, in urban waters.

One method of quantifying fluorescence in the laboratory is by using a fluorometer calibrated for detergents. In our tests, we used the GFL-1 Portable Field fluorometer (Figure F3.2).

The components of the GFL-1 Fluorometer are the power switch, sample chamber, battery compartment, source module, detector filter cartridge, display, keypad, and the interface port. A 1.2 Ah rechargeable lead-acid battery powers the unit when in the field. The fluorometer contains high efficiency interference filters optimized for fluorescence detection. It contains a silicon photodiode detector and a LED source. The interface port is also used as the battery charger port. A 192 X 192 dot LCD screen is used for text and graphical data presentation.

Figure F3.2: GFL-1 Portable Field Fluorometer

Calibration

Before the instrument is used, it should be calibrated with a detergent solution. No general standard detergent solution is available, so a commercially available detergent is used to prepare standard solutions. For this research, a common commercial detergent, Procter & Gamble's *Tide ™* was used. The purpose of calibrating the fluorometer is to set the instrument fluorescent signal levels to correspond to different concentrations of this commercial detergent. Single point and multipoint calibrations are available with this fluorometer. The manufacturers report that the solution used in calibration is unimportant in that the procedure is the same regardless of the solution used. A five-point calibration method is used for instrument calibration. To test a sample, the instrument must be in "test mode." The test mode cannot be used until a calibration table has been built, or an existing one is made active. If there is no active calibration table, the test mode screen will automatically default to the "calibration menu" screen.

To install a new calibration table, select CREATE CAL TABLE by pressing 1 on the keypad. Soon the cal table builder screen appears on the display. Since a five point calibration is being done, six different concentrations of Tide detergent were made: 0.5mg/L, 5mg/L, 10mg/L, 50mg/L, 100mg/L, 500mg/L. A concentration of 25 mg/L of Tide corresponds to a typical working solution for a batch of laundry. The sample bottles for the GFL-1 fluorometer come with the instrument. These are the only sample bottles that can be used for the measurement of fluorescence. There are five steps in making a calibration table:

Step 1
The screen will prompt to insert the most concentrated reference in order to set the detector gain. In this case, the highest concentration is 500mg/L. Press ENTER.

Step 2
Insert the blank and press ENTER.

Step 3
The next step is to enter the calibration units (e.g., mg/L). Pressing the ENTER key takes takes the user to the next step.

Step 4
This step prompts the user to insert a reference sample of any concentration. After inserting the reference sample, press ENTER. The screen will then prompt the user to enter the concentration value for the inserted reference sample. After setting the known reference, the screen will ask whether or not to do another point. Press YES and repeat the above sequence until you have inserted all the prepared reference samples. The reference samples should be inserted in a random fashion and not in the order of increasing or decreasing values of concentration.

Step 5
The last step prompts the user to name the calibration table. It should be noted that calibration tables are not saved until a name is given to the table. Then press ENTER.

Now the fluorometer is ready to start running samples.

Sample Test Mode

Figure F3.3 is the first screen display shown after switching on the fluorometer. Press 1 for the test mode, since the calibration table has already been saved.

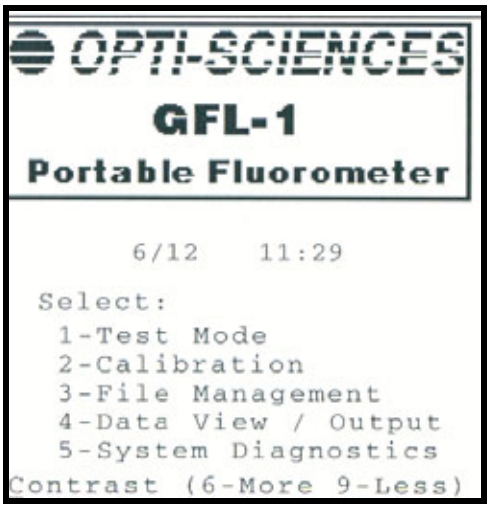


Figure F3.3: Main Menu

The screen will then display the following (Figure F3.4):

Figure F3.4: Calibration Menu

Press 2 for using the saved calibration table as the active calibration table in the memory. The next screen would prompt you to enter the desired table number saved. If you have saved only one calibration table, press 1.

Place a blank sample in the sample chamber and press ENTER (Figure F3.5). You will then see the screen displayed in Figure F3.6.

Figure F3.5: Placing Sample into Sample Chamber

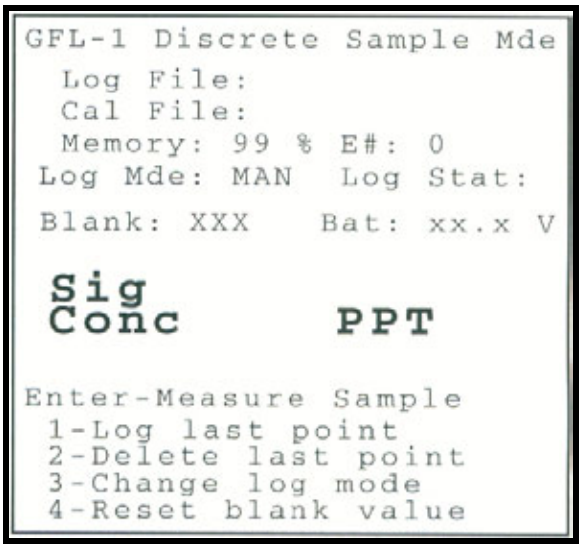


Figure F3.7: Discrete Sample Mode

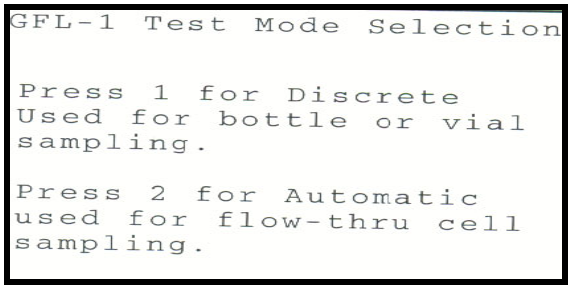


Figure F3.6: Test Mode Selection

Press 1 for doing discrete bottle sampling.
A new screen will appear (Figure F3.7).

With calibration complete, the instrument is ready to analyze the samples. To run a test, simply load a sample into the chamber and press ENTER. The unit will measure the sample and present the data a few seconds later. A busy message indicates that the test is in progress. Press ESC to return to the main menu.

Initial Tests using the Fluorometer

Initial tests were conducted after the first calibration to get an indication of the repeatability and drift of the results obtained from the new instrument. Five different concentrations of Tide detergent samples were made and tested for fluorescence after varying periods of time. The results of these tests are shown in Figure F3.8.

It is obvious that the fluorescence signal from Tide degrades with time and that the analyses should be evaluated within two hours. Other samples of commercial and household detergents were also evaluated and degradation of fluorescence with time was also identified. The largest changes occurred between about one and two hours after sample preparation. There was very little change after this initial two hour period. In the real world, the time between mixing of a laundry detergent with the washwater at the laundry, its discharge, and its analysis in the laboratory is at least two hours. Therefore, the fluorescence values used are those obtained after the signals have reached a relatively constant value. The results of the tests on certain commercial and household detergents are shown in Figure F3.9.

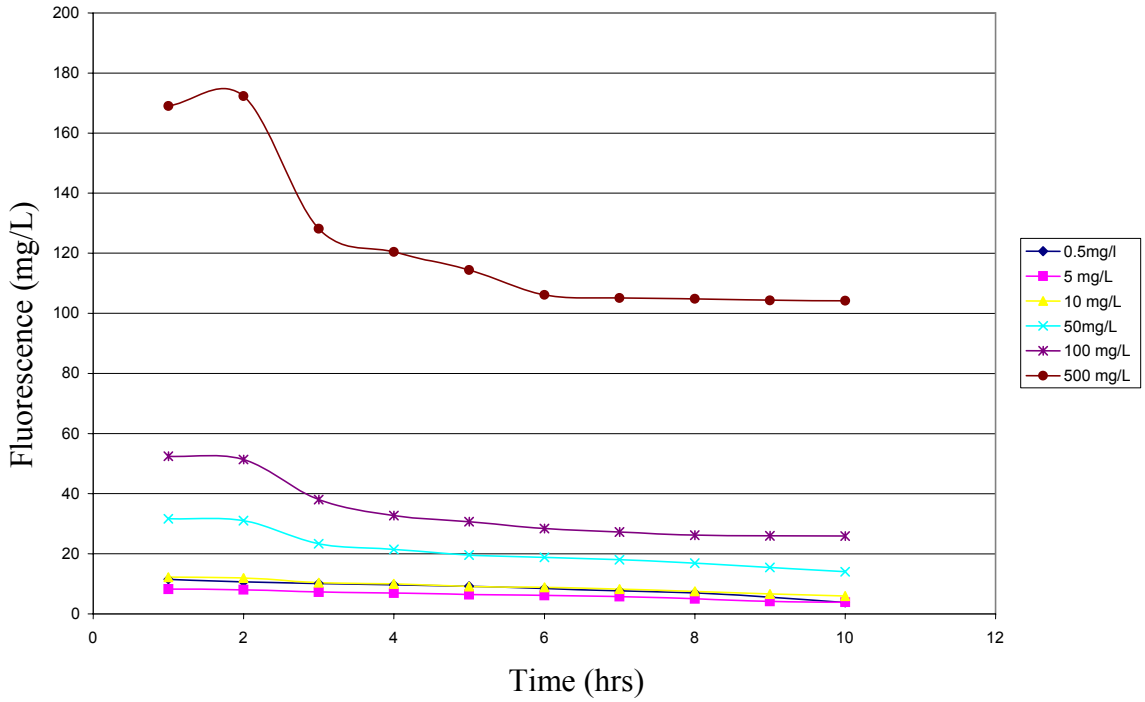


Figure F3.8: Changes in Tide DetergentFluorescence over Time

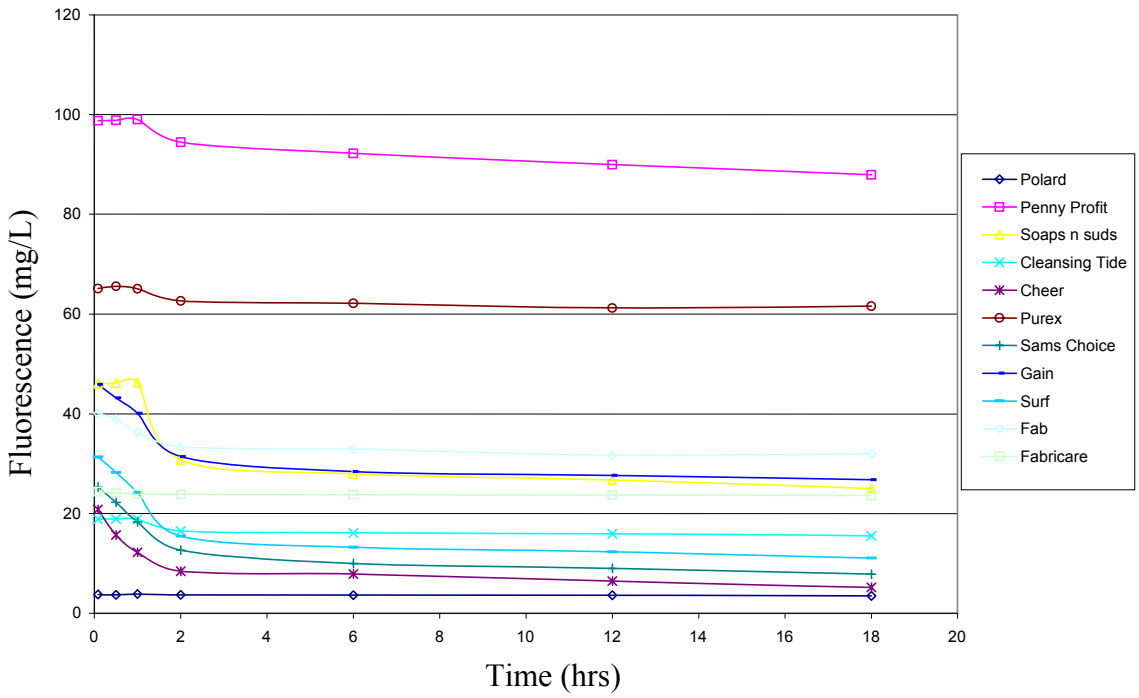


Figure F3.9: Changing Fluorescence with Time

The commercial laundry detergent samples in this graph were *Polard, Penny Profit, Soaps n Suds, and Cleansing Tide*. The others are household detergents (*Cheer, Purex, Sam's Choice, Gain, Surf, Fab, and Fabricare*). *Soaps n Suds* had a steep drop in fluorescence after one hour of preparation of the sample. After two hours, the fluorescence values stayed relatively constant without further changes. There was only one sample (*Polard*, a commercial detergent) that did not show any change in its fluorescence value. This detergent also had the lowest fluorescence signal of any of the samples. Although equal concentrations of all of these detergents were evaluated (50 mg/L), the fluorescence values ranged from 5 mg/L to 100 mg/L, as Tide. Obviously, the ingredients of the different detergents varied greatly.

F3.3 Surface Tension Test for the Detection of Detergents

Introduction

This discussion presents a proposed sensitive method to detect detergents without hazardous chemicals and with standard laboratory equipment. The method uses the property of the detergent to decrease the surface tension of the bubbles formed when the sample is agitated. Different detergents at different pHs were used during these tests. Results indicate that the method can be used to detect detergent concentrations above 1 mg/L, and can be used as a presence/absence test for concentrations above 0.3 mg/L. The method also was verified with samples collected from a known inappropriate detergent discharge.

One of the effects of detergents in water is the reduction in surface tension. When a sample of water with detergent is agitated, air is mixed with water, creating bubbles. Because the surface tension is reduced, the tension that controls the pressure of the air is low and the surface film is not destroyed. This property can be used to estimate the detergent concentration based on the amount of foam produced after the sample is agitated.

The amount of foam formed after a sample of water with detergent is agitated can be affected by various parameters. Temperature can affect the surface tension of the water. An increase in the temperature will reduce the surface tension. Foam production can also be affected by the chemical composition of the water. As an example, low pH will decrease the foam production.

The following discussion presents an inexpensive, safe, and reasonably sensitive method to estimate the detergent concentrations in a water sample using common laboratory equipment and without hazardous reagents.

Methods

General laboratory equipment was used to generate foam from samples of distilled water and detergent at different concentrations. The idea of the experiment was to drop the sample inside a burette from a constant elevation and to measure the height of the foam created 10 seconds and 1 minute after the last drop fell.

Apparatus:

- A rectangular base support and rod assembly
- A 50 mL burette
- A clamp to hold the burette
- A 25 mL blowout pipette
- Two 10 mL pipettes
- A stop watch
- A 200 mL volumetric flask
- A portable pH meter

A rectangular base support was used to hold the burette vertically. Using a 25 mL pipette, a 25 mL sample was released into the 50 mL burette. The sample was released by free fall from near the top of the burette, taking care that the sample does not touch the wall of the burette to maximize the amount of bubbles that can be produced. An initial reading of the foam height was taken 10 seconds after the pipette was drained. A final reading was obtained 50 seconds later.

Reagents:

- Detergent (Tide)
- Distilled water
- 500 mL NaOH 1N
- 500 mL H_2SO_4 0.02N

Four samples at the same concentration were created at the same time. Four stands and four burettes were used for each concentration. After the reading, the burettes were washed for more than 2 minutes until they were clean.

To obtain more foam during the experiment, the pH was increased up to 12. The sample was diluted with distilled water and 10 mL of 1N NaOH added. The sample was prepared in a 200 mL volumetric flask. NaOH was selected because it is present in most of the detergents. After the reading was taken, the sample (200 mL) was neutralized with 100 mL 0.05N H_2SO_4 before disposal.

Results

Table F3.11 shows the foam reading above the water surface 10 seconds and 1 minute after the last drop.

The results indicate that this method can be used as a presence/absence test for detergent concentrations between 0.2 and 1 mg/L (as Tide) and to estimate concentrations above 1 mg/L. The method is simple and does not require specialized equipment.

An advantage of this method is that the equipment is easily available and inexpensive. The disadvantages are the variability in readings due to changes in temperature and characteristics of the detergents.

Figure F3.10 shows the results from concentrations between 10 and 50 mg/L. For readings above 10 mg/L, if the level of detergent increases the height of the foam also increases in a parabolic shape. It was also observed that the repeatability of the results decrease at high levels.

For levels of detergent lower than 10 mg/L, there is not an important change in the reading. The minimum reading that can be obtained from the burette is 0.05 mL. For samples in this range the reading is close to the precision of the instrument. Figure F3.11 shows the results from concentrations between 0 and 5 mg/L.

Readings below 1.0 mg/L create a circle of bubbles around the wall of the pipette. This circle was not present when distilled water was used. This procedure can be used as a presence/absence test. The circle was observed for concentration of detergent higher than 0.2 mg/L.

Conclusions

The new method is an inexpensive, safe and moderately accurate method to estimate the presence of detergents in concentrations above 0.2 mg/L. For detergent concentrations above 10 mg/L, the method can be used to quantify the concentrations. These higher concentrations have been observed in sewage, industrial discharges, laundries and car wash areas.

Table F3.11: Foam Readings Over Time

Concentration (mg/L, as Tide)	Foam Height after 10 sec. (mL)	Foam Height after 1 min. (mL)
0	0	0
0.1	0	0
0.2	T	T
0.3	T	T
0.4	T	T
0.5	T	T
0.7	T	T
1	0.05, 0.05, 0.05, 0.05	0.05, 0.05, 0.05, 0.05
2	0.1, 0.1, 0.1, 0.1	0.1, 0.1, 0.1, 0.1
3	0.1, 0.1, 0.15, 0.15	0.1, 0.1, 0.15, 0.15
5	0.15, 0.15, 0.15, 0.15	0.15, 0.15, 0.15, 0.15
10	0.2, 0.2, 0.2, 0.2	0.35, 0.4, 0.4, 0.4
20	0.8, 0.6, 0.6, 0.6	1.5, 1.3, 1.4, 1.3
50	2.6, 2.6, 3.0, 2.8	3.8, 3.5, 3.7, 3.6

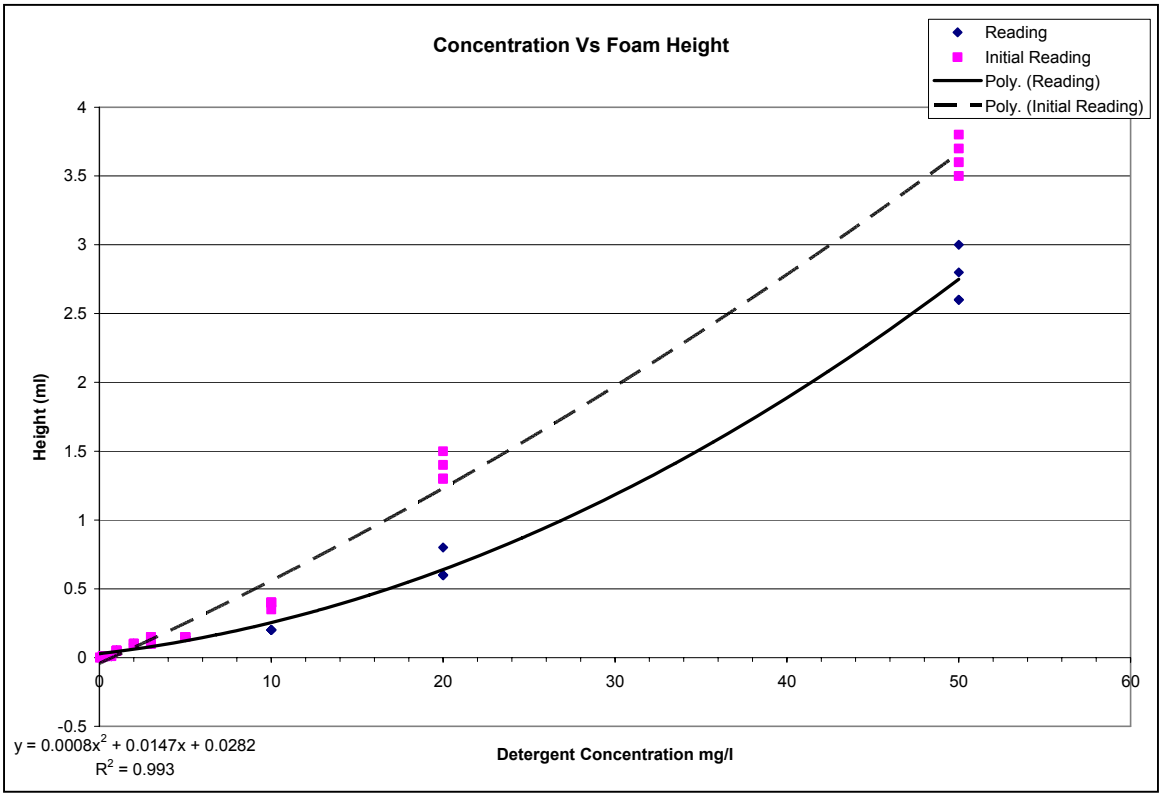


Figure F3.10: Correlation Between Concentration and Foam Height at Higher Concentrations

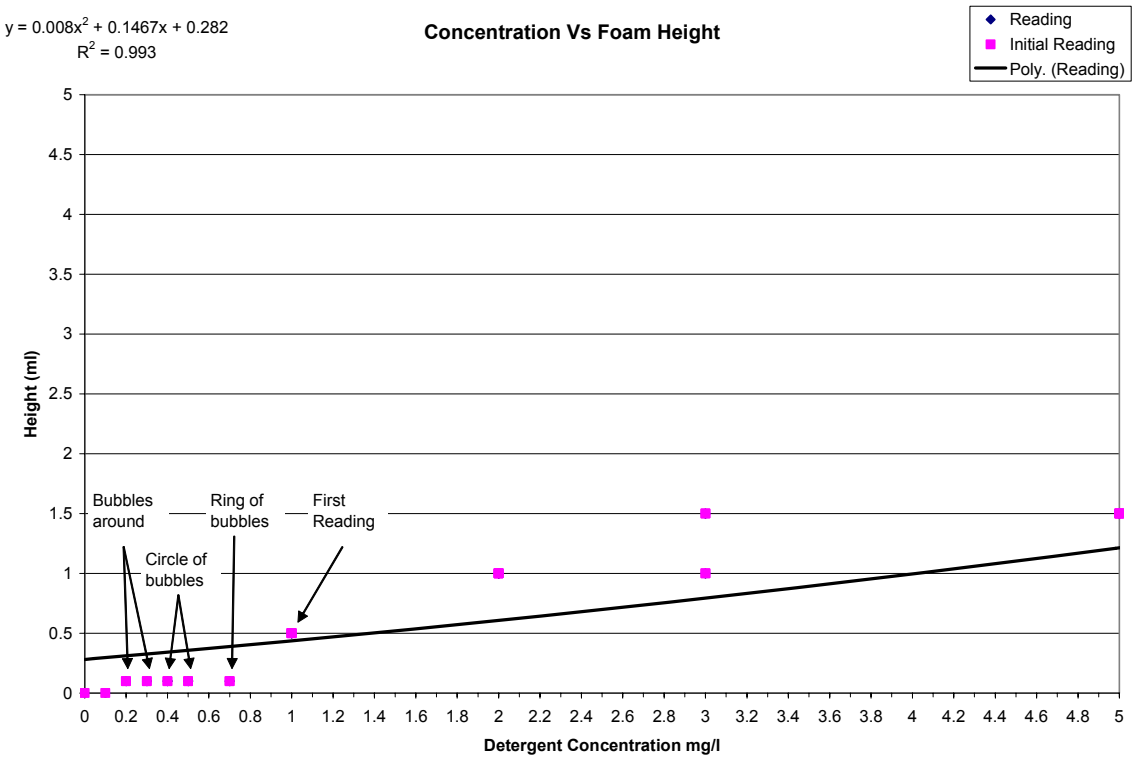


Figure F3.11: Correlation Between Concentration and Foam Height at Lower Concentrations

APPENDIX F4: LAB TESTING OF "OPTICAL BRIGHTENER MONITORING" TO FIND INTERMITTENT DISCHARGES

Introduction

Fabric brighteners are fluorescent dyes added to soaps and detergents. These are used to produce a brightening effect after laundering. They absorb the UV rays of the sunlight and then fluoresce as a bright blue.

Optical Brightener Monitoring (OBM) is a new method for detecting fluorescent materials in water samples. It is based on a method used to measure the presence of strongly fluorescent tracer dyes.

Briefly, cotton pads that are free of fabric brighteners are used for checking the presence of optical brighteners in water samples. Cotton pads are soaked in the water sample and then dried in a darkened room. The pads are then viewed with ultraviolet (UV) light to check for the presence of fluorescence. This is an inexpensive, but much less sensitive, method for the detection of fluorescence compared to fluorometers.

Homemade OBM traps are inexpensive and easy to make. Table F4.1 lists the average costs of the supplies needed to make OBM traps, most of which can be found at a local hardware or home improvement store.

The following tests were conducted to determine how effective this test would be to detect inappropriate discharges originating from washwaters or sanitary wastewaters to storm drainage systems. This test may have several advantages compared to other methods used to detect these wastewaters: fluorometers are very expensive, detergent analyses can be hazardous, and the boron content of detergents varies widely. In addition, the OBM method usually involves placing the test pads in the targeted water for extended periods (up to several days) and may therefore be sensitive to intermittent discharges. These tests were therefore conducted to determine the sensitivity of the OBM method and to investigate its reliability under both field and laboratory conditions.

Table F4.1: Start-Up Costs for Optical Brightener Monitoring
(Source: Sargent and Castonguay, 1998)

Equipment	Cost
25 - 1/2” wire mesh (cages)	$ 75.75
42 feet black plastic mesh	$ 4.50
100 yards 20 lb. test monofilament	$ 2.00
500 elastics	$ 10.00
1000 staples	$ 5.00
Unexposed labels	$ 12.00
5 boxes plastic bags	$ 5.00
200 craft sticks	$ 2.00
25 aluminum spikes	$ 23.00
1 case unwashed cotton pads	$ 88.00
12 rubber gloves	$ 16.00
6 watt UV light with 2 bulbs	$ 240.00
Total	**$ 483.25**

Test Procedure

Step One:
Care should be taken so that samples are handled properly with no cross contamination. Gloves free of fabric brightener should be worn at all times when handling the test materials. The field test kit includes brightener-free cotton pads and a sampler cage to hold the pads in place if they are to be deployed for extended periods. The sampler cage is a non-metallic plastic, or a vinyl coated black wire cage having 0.5" openings. The cage consists of two hinged pieces approximately 5" by 5". This cage should be fabricated so that it will hold the fabric pads at approximately a 30 to 45 degree angle. The open end of this cage is held closed with an elastic band. A 4 to 6 watt long-wave fluorescent UV ultraviolet light is used to observe fluorescence on the fabric.

Step Two: (Placement)
At an outfall or small stream sampling location, the wire cage is secured by a heavy monofilament fishing line tied to a branch, a rock, or an aluminum spike. In sampling catchbasins, the wire cage is lowered into the catch basin by the monofilament fishing line that is then tied to the grate cover or other object. The wire cage is suspended within the water flow. The fabric pad is generally exposed for seven days. If intermittent flows are present, the device may be kept for an even longer period. However for quick sampling, the pad needs to be exposed to a water sample for at least one hour. If rust or sediment obscures the sample, then the duration needs to be shortened.

Step Three: (Retrieval)
After the samplers are retrieved from the water, the pads are removed from the sampling device. The pads are then rinsed in the sampling water to remove any surface sediment, and squeezed to remove excess water without tearing or ripping the pads. The pads are also labeled (see Figure F4.2).

All labels must be analyzed using the UV light to check for the presence of brighteners, as most white paper contains optical brighteners that can interfere with the optical brightener measurements of the pads. Label information should include, location, day/time of placement, and day/time of removal. The stiff paper labels are stapled to the retrieved sampling pads, placed in a zip lock bag, and kept in the dark as they are being transported to the laboratory. Upon arrival at the laboratory, the pads are dried in a darkened room (where they will not come into contact with direct sunlight) by hanging on a non-cotton monofilament line (see Figure F4.2). The line should either be replaced or cleaned by a cotton pad after every use.

Step Four: (Analysis)
The pads are viewed in a darkened room using a long-wavelength UV light source. The pads are easiest to examine in a dark room using a special UV lamp viewing cabinet. A non-exposed pad is used as a control. The pad will fluoresce if it is positive for brighteners, while it will be noticeably drab like the control pad if it is negative. Uneven exposure of the pad to optical brighteners may result in uneven fluorescence of the pad. If the reason for partial fluorescence can be explained then the pad should be regarded as positive. Specks or spots of fluorescence on the pads may be ignored.

Figure F4.2: Labeling the Pad

Figure F4.3: Drying the Pads

Method Modifications

While reviewing the prior methods for the OBM for inappropriate discharge detection, the following issues were brought up:

a) Do the pads need to be left in the field for extended periods and how long should the pads be exposed to the sample water?

b) Are there any detrimental effects of direct exposure to sunlight while drying the cotton pads?

c) What is the sensitivity of the OBM compared to the other tests used to detect washwaters and sanitary wastewaters?

The above points are discussed in the following paragraphs.

Leaving the cotton pad and the sampling device at the sampling location

If there is continuous flow at an outfall, there is no need to keep the pads at the outfall for extended periods. If grab samples are collected from the flowing outfalls for later chemical tests, a separate sample bottle can be conveniently collected for optical brightener tests. During our analyses, the cotton pads were immersed in the sample bottles at the time of sample collection. This sampling modification greatly reduced the time and effort needed to conduct the tests. Our initial tests indicated that the high sediment loads associated with the outfall discharges would hinder the ability to measure the fluorescence due to coating the fabrics with silt. If the pads were placed in the OBM sample bottles when the water was collected, the time required to bring the samples to the laboratory was thought to be sufficient to affect the pads. Tests were conducted in the laboratory to determine the time needed to affect the pads. The standard procedure used at least a one hour exposure period.

Direct exposure to sunlight while drying the cotton pads.

There was a concern related to the degradation of fabric fluorescence in the presence of sunlight, especially after the fluorometer tests indicated significant decreases in water sample fluorescence during the first hour or two after detergent mixing. In order to test this concern, two samples were prepared with the same concentration of detergents. Two cotton pads were immersed in each of the bottles. One was dried under the direct exposure of sunlight, while the other one was dried in a dark room. After 24 hours, both sets of pads gave the same fluorescence under the ultraviolet light. Therefore, it was concluded that direct sunlight exposure to the dried cotton pads did not affect the test results.

Other sampling and laboratory practices that were important included using gloves while handling the pads, and testing the cotton pads for fluorescence under the UV lamp before their use.

Laboratory Verification using Standard Samples and Field Use in Cribbs Mill Creek

The basic OBM method is a presence/absence test, with unknown sensitivity. In order to make this test more useful, additional tests were conducted. The initial test used different Tide detergent standards. Tide detergent samples were made with concentrations of 0.5 mg/L, 5 mg/L, 10 mg/L, 20 mg/L, 30 mg/L 50 mg/L, 100 mg/L, and 500 mg/L. Samples from each dried test pad were attached onto a card, as shown in Figure F4.4.

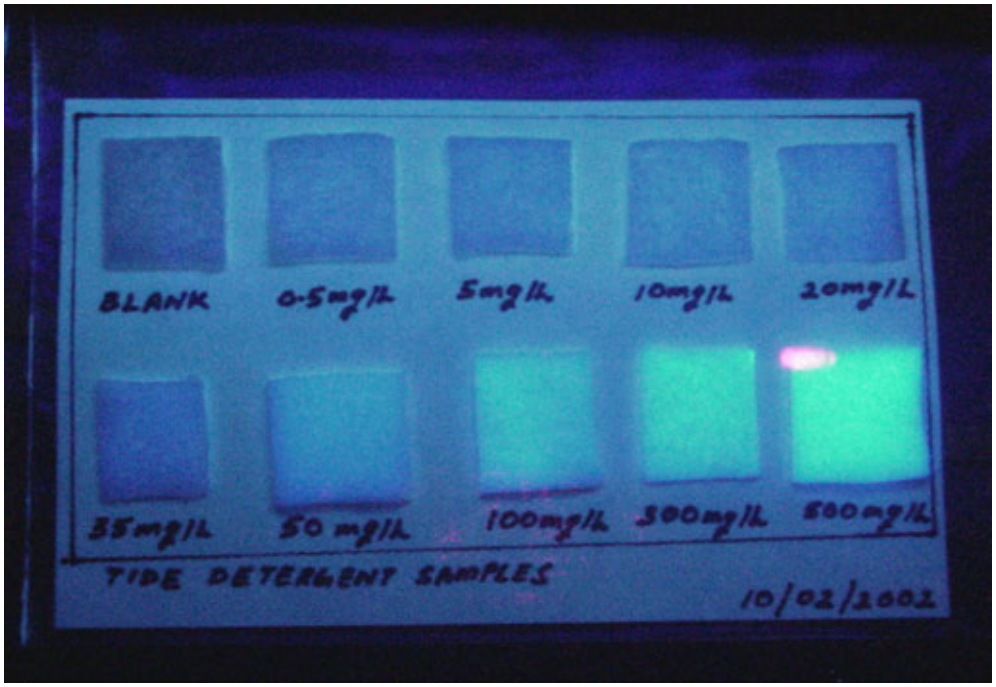


Figure F4.4: Standard Tide OBM Pads

As can be seen in Figure F3.4, concentrations below 35 mg/L all look identical. The 50 mg/L Tide solution (the first one with an obvious fluorescence response) is representative of a full-strength washwater as typically used in household laundry. Thus, it may be concluded that the OBM method may not be useful for samples having anything less than full-strength washwaters.

The maximum fluorescence concentration obtained from the Cribbs Mill Creek samples was 17mg/L (as Tide), and no positive responses for fluorescence using the OBM method were found.

Conclusion

This test was originally designed to identify faulty septic systems and storm drainage systems using fluorescent dyes. The fluorescent dyes (Fluorescence and Rhodamine FWT) used in these types of tests are very strong dyes and are used in moderate concentrations. They are therefore much easier to be detected by the cotton pads and the OBM method than the fabric brighteners in washwaters. OBM is a quick, easy, and inexpensive method, but can only reliably detect undiluted washwaters, and likely will miss the more common diluted washwaters found as inappropriate discharges. Other simple methods exist that are more sensitive, although the OBM method may be most suitable if intermittent discharges of undiluted washwaters are expected.

Appendix F5. In-house Analytical Considerations for Indicator Parameters

Introduction

Program managers need to understand the basic analytical options and safety considerations, for each analytical method used to measure indicator parameters. This understanding helps program managers choose what indicator parameters to collect and where they should be analyzed. This section provides a summary of the basics.

Table F5.1 summarizes the recommended analysis method associated with each indicator parameter. An extended description of each analysis method is provided below.

Colorimetric – Colorimetric methods utilize specialized instruments such as a colorimeter or a spectrophotometer (Figure F5.1). The two instruments are similar and quantify parameter concentrations by adding reagents to the sample and passing through a defined spectrum of light. In general, spectrophotometers can analyze a much broader range of parameters than colorimeters.

Table F5.1: Analytical Considerations for Illicit Discharge Indicator Parameters

Indicator Parameter	Method	Analysis Type	Limit of Detection
Ammonia	*HACH Method 8155*	Colorimetric	0.01 mg/L
Boron	*HACH Method 10061*	Colorimetric	0.02 mg/L
Chlorine	*HACH Method 8021*	Colorimetric	0.02 mg/L
Color	*HACH Color Wheel*	Color Comparator	1 color unit
Conductivity	Various Probe or Meter Techniques	Probe or Meter	N/A
Detergents – Surfactants	*Chemetrics Chemets*	Color Comparator	0.25 mg/L
E. coli, Total Coliform, Enterococci	IDEXX: Colilert Or Enterolert	IDEXX: Colilert Or Enterolert	1 MPN/100 mL
Fluoride	*HACH Method 8029*	Colorimetric	0.01 mg/L
Hardness	*HACH Method 8213*	Titration	1 mg/L
Potassium	*HACH Method 8049*	Colorimetric	0.1 mg/L
	Horiba Probe	Probe	5 mg/L
PH	Probe (Various)	Probe or Meter	1 pH unit
Turbidity	Various Turbidity Meters	Probe or Meter	1 NTU

Figure F5.1: Spectrophotometer

Color Comparator – This analysis method is a less quantitative version of the colorimetric method. Samples are prepared by adding reagents, and assessing the color in comparison to a color cube (see Figure F5.2) or color disk that assigns a concentration for different color shades.

Figure F5.2: HACH Color Cube Comparator

Probes – These methods use a probe to pass an electrical current through the sample for specific light wavelength (for most indicators) or measure the scatter of light (for turbidity). While results are immediate, lab analysts need to frequently calibrate the probe using standard solutions to assure accurate data.

Titration – Titration techniques measure the concentration of indicator parameters by determining the amount of a reagent needed to produce a specific reaction in the sample, which is often indicated by a color change. Lab analysts carefully record the amount of reagent added to the sample using a "burette," which is a graduated cylinder with a valve-controlled opening at the bottom. An alternative and more precise technique is a digital titrator. Both methods rely on equations or lookup tables that relate to the amount of reagent added to the estimated concentration of the indicator parameter.

IDEXX Techniques: Colilert or Colisure - These proprietary methods are used to measure *E. coli*, total coliform and Enterococci bacteria. Samples are sealed along with a reagent in a specialized tray that is then placed into an incubator for 24 hours. The analyst then measures the number of cells in the tray that have changed color or shine under a fluorescent bulb, which is used to indicate the amount of bacteria in the sample (Figure F5.3). The IDEXX method uses a standard chart to relate the number of cells that have a positive reaction to the presence of bacteria. The IDEXX method is fairly simple and safe, but requires fairly expensive equipment.

Safety and Waste Management Considerations

Each analysis method has special safety and waste disposal considerations, which are outlined in Table F5.2.

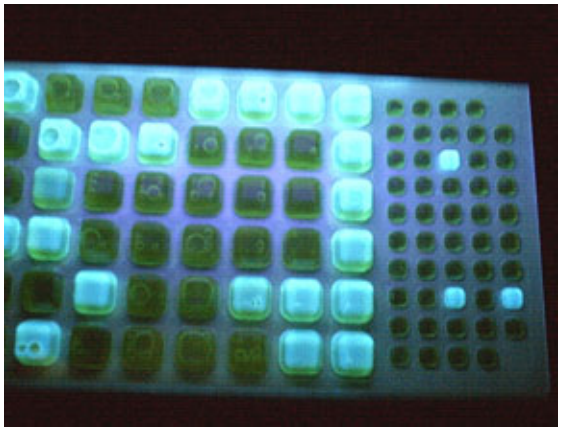


Figure F5.3: IDEXX Results

Table F5.2: Special Safety and Waste Management Considerations			
Indicator Parameter	**Method**	**Major Health Risks**	**Special Disposal Requirements**
Detergents – Surfactants	Chemetrics Chemets	Carcinogenic. Causes dermatitis and lung infection. Need to provide ventilation.	Hazardous Waste
E. coli; Total Coliform; Enterococci	*IDEXX: Colilert Or Enterolert*	OK	Potential Biohazard (Consult State Health Agency for requirements)
Fluoride	HACH Method 8029	Causes erosion of teeth.	Reagent is a hazardous waste.
Hardness	HACH Method 8213	No major	Reaction produces a hazardous waste.

TIP

The IDEXX technique requires a special adaptation when used to measure *E. coli* in discharges from storm drain outfalls. The concentration that distinguishes sewage from other dischares is greater than 12,000MPN/100ml. Using this method, the maximum redable concentration is only 2,619MPN/ml. Dilute outfall samples to 10-20% of their original concentrations with deionized water in order to read the very high concentrations of *E. coli* that identify sewage discharges.

References

Pitt, R. 2004. *Methods for Detection of Inappropriate Discharge to Storm Drain Systems.* IDDE Project Support Material.

Pitt, R. 2001. *Methods for Detection of Inappropriate Discharges to Storm Drainage Systems: Background Literature and Summary of Findings*. IDDE Project Support Material.

Sargent, D. and W. Castonguay. 1998. *An Optical Brightener Handbook*. Prepared for: The Eight Towns and the Bay Committee. Ipswich, MA. Available at: http://www.naturecompass.org/8tb/sampling/index.html

APPENDIX G

SAMPLING PROTOCOL CONSIDERATIONS

Developing a Consistent Sample Collection Protocol

A good field sampling protocol incorporates eight basic elements:

1. Where to collect samples
2. When to collect samples
3. Sample bottle preparation
4. Sample collection technique
5. Storage and preservation of samples
6. Sample labeling and chain of custody plan
7. Quality assurance/control samples
8. Safety considerations

1. Where to Collect Samples

Indicator sampling normally occurs at three principle locations in the storm drain system to detect illicit discharges - at the outfall, in the stream, and within the storm drain pipe network.

Monitoring of dry weather flows from outfalls is the most common location in most IDDE programs, and the majority of this chapter focuses on these techniques.

In-stream monitoring involves sample collection at perennial stream channels during dry weather flow conditions. Stream monitoring is less precise than outfall monitoring at detecting individual discharges. It can, however, screen stream reaches for those with the greatest illicit discharge potential, detect the most severe or high volume discharges, and measure progress over time in terms changes in stream water quality.

In-pipe sampling is often needed to track down and isolate individual discharges once a potential discharge problem is encountered at an outfall. Many of the sample collection protocols discussed in this section can be applied for in-pipe sampling, although additional testing methods to track down sources are described in Chapter 13.

2. When to Collect Samples

Indicator samples should be collected during dry weather periods to avoid flowing outfalls caused by storm water or groundwater infiltration. While the traditional definition of dry weather has been 72 hours without rainfall, some communities have shortened this window to 48 hours to make sampling more practical. An exception to this rule is sampling to respond to hotline complaints, which should be conducted immediately. Time of day that sampling is conducted is particularly important when the suspected source is residential sewage. Peak water usage occurs in the morning and evening, therefore sampling in the early morning (i.e., beginning of the work day) is recommended in these situations. In some regions of the country, sampling should be scheduled to coincide with the seasons where shallow groundwater influence is minimal.

3. Sample Bottle Preparation

Most indicator samples are stored in a polyethylene plastic sample bottle that is opaque or clear. Sample bottles can be reused, but only if they are acid-washed between field visits. If bacteria samples are collected, a new 120 ml sealed sample bottle is needed for each sample. Samples requiring a preservative are addressed in element 5.

4. Protocols for Sample Collection

Sample collection should reduce the potential for contamination, and prevent the field crew from being exposed to harmful

pollutants. Some considerations for sample collection include:

- Wear surgical gloves (unpowdered nytrile gloves are recommended to limit chances of contamination) when collecting the sample, and wash hands with sanitary wipes after the sample(s) is collected.
- Dry weather flows can be shallow, have low flow volumes, and be hard to reach. In some cases, alternative sample collectors may be used. A "dipper," consisting of a measuring cup at the end of a long pole, can be used to catch flows from the outfall. A pre-measured, cut-off plastic milk jug can be used to capture shallow flows from the pipe (see Figure G.1). In either case, make sure not to disturb any sediments or benthic growth in the pipe as a sample is taken. Also, be sure to rinse these alternative sample collectors three times with sample water before collecting the sample.
- Fill the bottle completely to the top (i.e., with the meniscus at the rim).
- Do not touch the inside of the lid or bottle.
- Add any needed preservative at the time of sample collection. (See Step 5).
- Label the bottle immediately. Ensure that samples stay at 4°C (40°F). On a hot day, put samples in an ice-filled cooler immediately, or carry "blue ice" in a backpack.

5. Sample Storage and Preservation

If the field crew cannot get the samples back for analysis within the same day, they will need to preserve the samples using the techniques outlined in Table G.1. Some suppliers and contract labs provide pre-packaged sample bottles that contain required preservatives. Each indicator parameter has a unique sample preservation technique and a maximum hold time for laboratory analysis.

> **Tip**
> When analyzing multiple parameters and preserving samples, the field crew may need to collect up to four samples at a site: one preserved with H_2SO_4, one preserved with HNO_3, one sealed new bottle preserved with Na_2SO_3 for bacteria, and one unpreserved.

Figure G.1: A dipper (a) is helpful when the outfall is hard to reach. A milk jug (b) can be used to collect samples from shallow flow.

Table G.1: Sample Preservation and Storage Requirements for Typical Outfall Monitoring Parameters
(Primary Source: APHA, 1998)

Parameter	Preservation[3]	Maximum Hold Time[4]
Ammonia	H_2SO_4 to pH<2 Refrigerate to 4°C	7 to 28 days
Boron	HNO_3 to pH<2	28 days to 6 months
Chlorine[1]	Not Applicable	15 minutes
Color	Refrigerate to 4°C	48 hours
Conductivity	Refrigerate to 4°C	28 days
Detergents – Surfactants[2]	None Required	48 hours
Bacteria (*E. coli*, Enterococci, Total Coliform)[2]	$Na_2S_2O_3$ in chlorinated waters Refrigerate to 4°C	6 to 24 hours
Fluoride	None Required	28 days
Hardness	HNO_3 or H_2SO_4 to pH<2	6 months
pH[1]	Not Applicable	15 minutes
Potassium[2]	HNO_3 to pH<2	28 days
Turbidity	Refrigerate to 4°C Store in the dark	24-48 hours

1. Indicates parameters that should be analyzed in the field.
2. Data for these parameters taken from the National Environmental Methods Index (www.nemi.gov)
3. Many contract labs will provide sample bottles with preservative already added.
4. For parameters with a range, the lower number is recommended by the reference, and the higher number is the regulatory requirement for sample storage.

6. Sample Labeling and Chain of Custody

The labeling and integrity of each sample are important parts of the sampling protocol. Program managers should develop a process to track the "chain of custody" from the time the sample is initially collected until it is analyzed and reported as data. The process limits errors resulting from mis-labeling, lost samples, and improper laboratory analysis. Table G.2 outlines the nine minimum elements of a chain of custody, recommended by APHA (1998).

Table G.2: Nine Elements of a Chain of Custody	
Element of Chain of Custody	**Description**
1. Sample Labels	Labels should include a unique ID, type of sample, name of collector, date and time of collection, date and time of preservation, and preservative used (if applicable).
2. Sample Seals	Seals the lid on the label to ensure they are not tampered with.
3. Field Log Book	Includes basic information about sample collection, usually the Outfall Reconnaissance Inventory (ORI) field form can be used for this purpose.
4. Chain-of-Custody Record	A sheet that tracks the transfer of samples between individuals.
5. Sample Analysis Request Sheet	A sheet that requests specific analysis types from the laboratory.
6. Sample Delivery to the Laboratory	Ensure that sample delivery is timely. Include chain of custody records with the sample.
7. Receipt and Logging of Sample	The lab needs to document time of receipt of the sample
8. Assignment of Sample for Analysis	The lab supervisor assigns an analyst to the sample. The lab supervisor or analyst is responsible at this point.
9. Disposal	Save samples until results are confirmed and finalized. Dispose of according to US EPA approved methods.

7. Quality Assurance Measures During Sample Collection

To ensure sampling results are accurate, it is important to institute quality assurance measures as part of the sampling protocol. Quality assurance samples serve as a check against biases introduced during sample collection, or within the laboratory. Quality assurance samples also assess the accuracy of the analysis method and its consistency for samples collected at the same site. The sampling protocol should define a minimum fraction of samples that will be used for quality assurance purposes (typically about 5% - 10% of all samples collected). Examples of quality assurance samples include field blanks, duplicate samples, split samples and spiked samples, which are described below:

Field Blanks – Field blanks are deionized water samples prepared in the field at the time of sample collection. If the lab results for field blanks have non-zero values, it indicates that impurities were introduced to the sample during collection or lab analysis. The distilled deionized water should be placed in whatever is used to collect samples (e.g., sample scoop, dipper, plastic milk bottle) and then poured in the sample bottle, just as if it had been scooped or dipped as a real sample.

Duplicate (Replicate) Samples – This quality assurance technique relies on the collection of two or more samples from the same location and flow source during the same field visit. A discrepancy between the two sample measurements indicates a lack of precision or repeatability introduced during sample collection or lab analysis.

Field Spikes – A field spike is a sample to which a known concentration of an indicator parameter is added (e.g., an ammonia concentration of 1.0 mg/L). Any difference between the known concentration and the final laboratory measurement reveals errors introduced during sampling and laboratory analysis.

Split Samples – Splits consist of a single field sample that is divided into two separate sub-samples for subsequent laboratory analysis. Typically, split samples are submitted to different laboratories, or analyzed by different analysts to determine the precision of laboratory results. Alternatively, split samples can be analyzed at a single laboratory without knowledge of the sample origin (referred to as a "blind sample"). Any discrepancy between the two sub-samples suggests a lack of precision or repeatability introduced during sample collection or lab analysis.

8. Safety Considerations

Whenever sampling is done there are safety considerations that require planning. This is even more important when sampling is being conducted in urban stream environments where there is potential for contact with contaminated water, sharp debris and objects, and threatening individuals (both animals and humans). Field crews should be comprised of at least two individuals, each equipped with proper foot (e.g., sturdy boots or waders) and hand wear (latex gloves). Key equipment for crews to carry include cell phones, a list of contact and emergency numbers, a gps unit, and a first aid kit. Private properties should not be accessed unless proper notification has been provided, preferably in advance. Lastly, program managers may want to consider requiring/recommending field crews to be vaccinated against Hepatitis B, particularly if the crews will be accessing waters known to be contaminated with illicit sewage discharges.

References

American Public Health Association (APHA).1998. *Standard Methods for the Examination of Water and Wastewater – 20th Edition*. Washington, D.C.

APPENDIX H

TWO ALTERNATIVE FLOW CHARTS

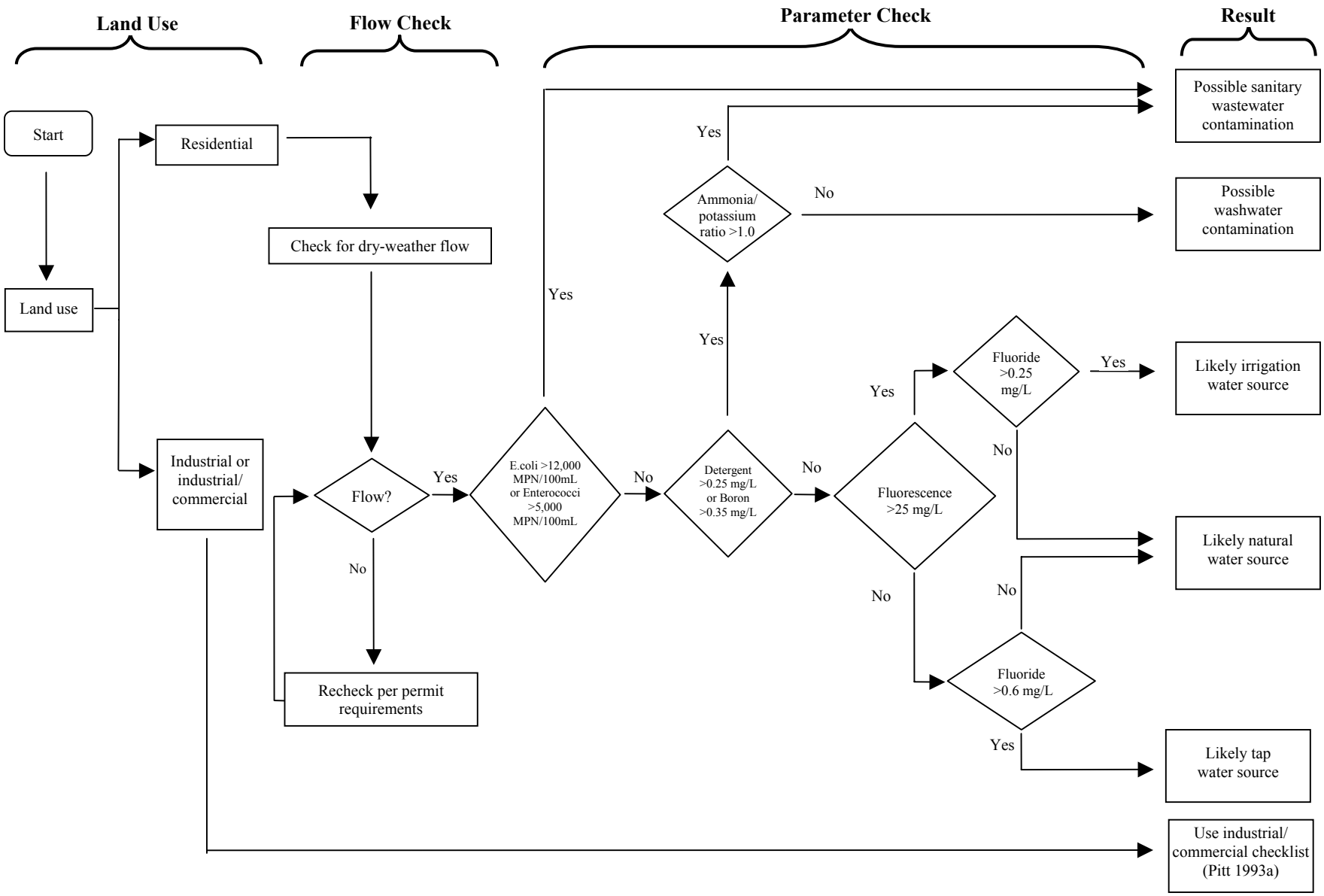
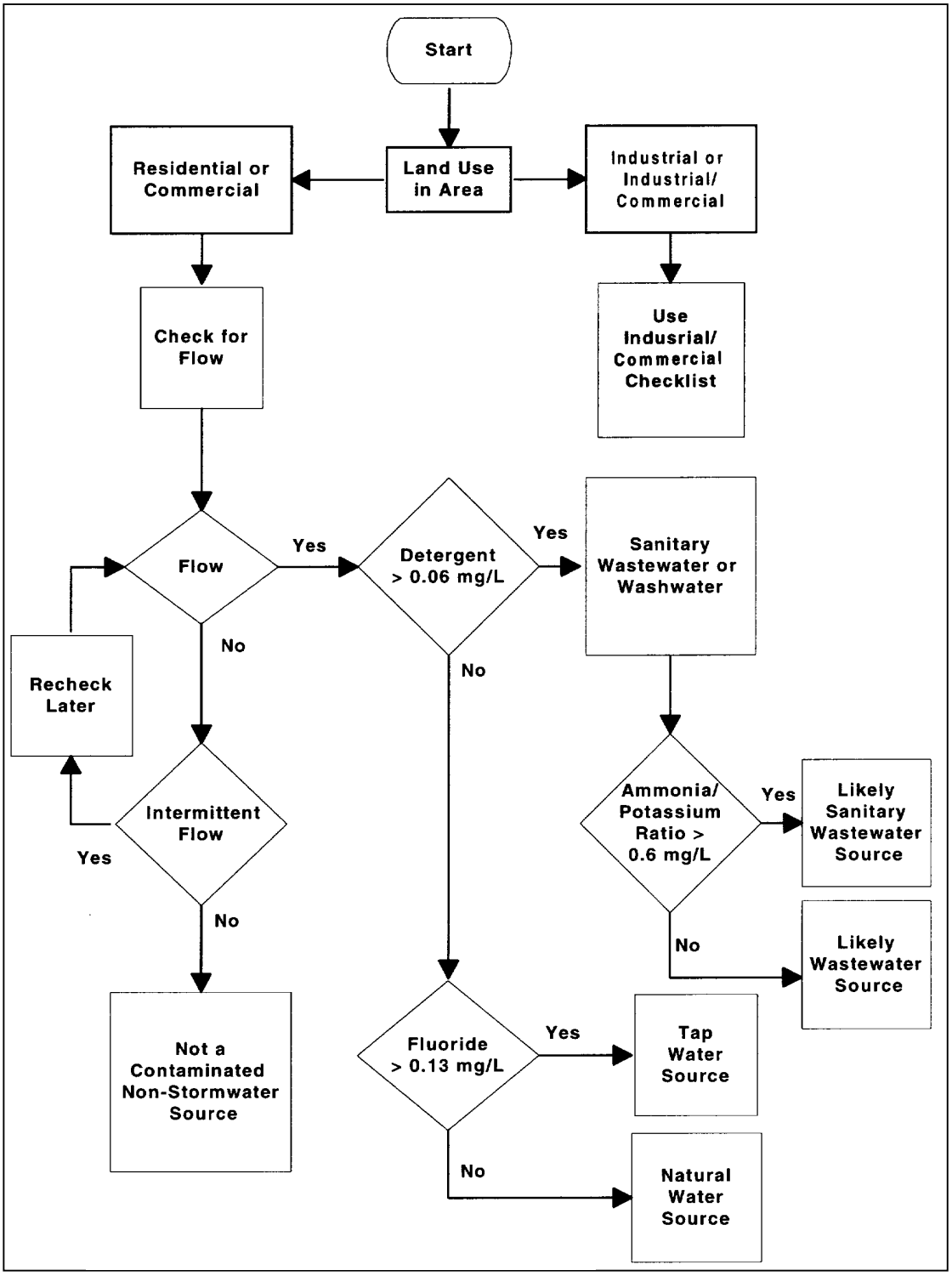


Figure H.1 Complete Flow Chart (Including Additional Confirmatory Parameters) from Tuscaloosa, Alabama

Source: Pitt (2004)

Figure H.2 Original Flow Chart Derived from Data in Birmingham
(Pitt and Lalor, 1993)



References

Pitt, R. 2004. *Methods for Detection of Inappropriate Discharge to Storm Drain Systems.* IDDE Project Support Material.

Pitt, R. and M. Lalor. 1993. *A User's Guide for the Assessment of Non-Stormwater Dischargers Into Separate Storm Drainage Systems.* EPA/600-R-92-238. Risk Reduction Engineering Laboratory, USEPA. Cincinnati, OH.

APPENDIX I

USER'S GUIDE FOR THE CHEMICAL MASS BALANCE MODEL VERSION 1.0

(Adapted from Karri, 2004)

Overview of the Model

The Chemical Mass Balance Model (CMBM) estimates the most likely source components that contribute to outfall flows during dry weather. In order to use the model, the user must have a Library File in the form of an Excel file in a specified format. This library file describes the concentration characteristics of potential local contributing flows. In the CMBM, the user selects the sources to be evaluated for an outfall, enters the values of the concentrations of the tracers measured at the outfall, and obtains a plot of the most likely source component in tabular form, and in probability plots.

Installation of the Model

The user must first install the model by inserting the disk and then clicking the 'CMBM_setup.exe' icon and following the on-screen instructions.

Model Inputs

The user enters the following data:

1. The potential sources to be evaluated for a particular outfall. The number of sources is entered in the first form (Figure I.1) and the user must then select the same number of sources and tracers when the lists of the sources and tracers are loaded.
2. The source library file containing source flow characteristics (median, COV, and distribution type) for the Monte Carlo statistical simulations (Figure I.2).
3. The tracer parameters for these sources and outfall contained in the library file. The user selects the specific tracers to be used from the check boxes when they are loaded in the first form.
4. The number of Monte Carlo simulations that are to be used by the model, up to 10,000 runs.
5. The observed outfall concentrations of the selected tracer parameters measured for a particular outfall (in the second form of the model). Press the continue button when these concentrations are entered.

In the first form

- Navigation from one step to another can be done by using either the mouse or the 'tab' button.
- Changing the value entered for 'Number of contributing sources to be evaluated' after entering subsequent steps will likely result in an error message. If the user wishes to change this value after starting on later forms, the user must use the 'Start over again' button (third form) and re-enter the earlier forms.
- The model can run up to eight sources and tracers in a single trial.

In the third form

- The user must first save the output file to run the Monte Carlo simulation.
- The user must first save the graph to view or print it.
- The user must first save the table to print it.
- If the table cannot be viewed properly, it can be resized.

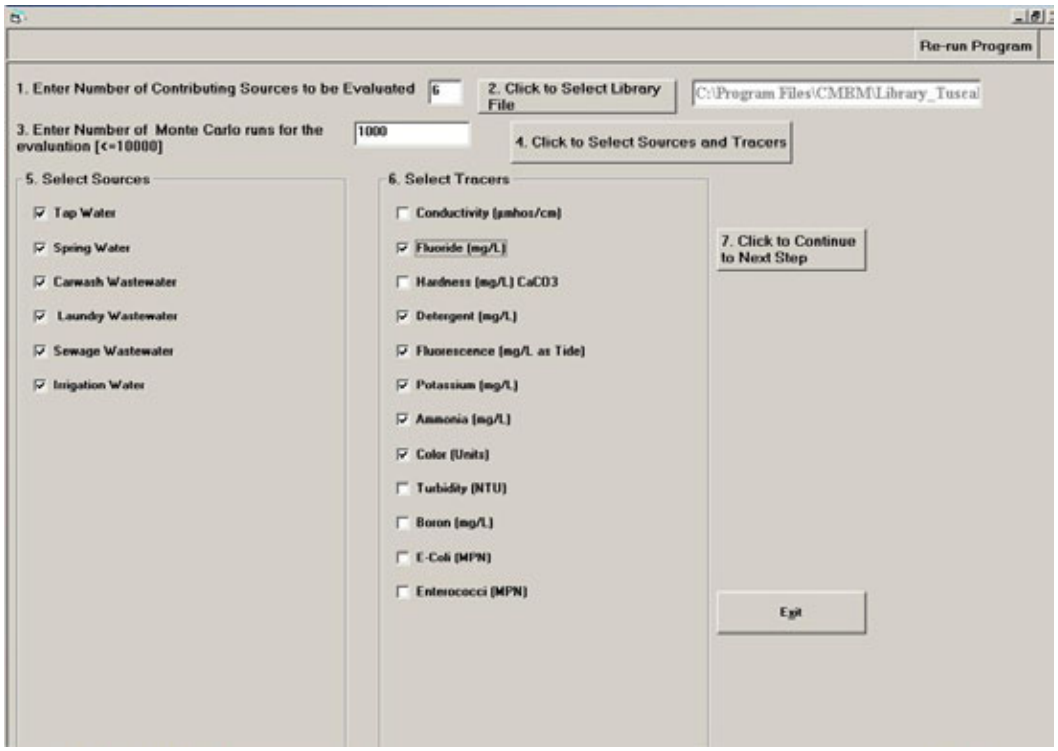


Figure I.1: Form-1 (Model inputs)

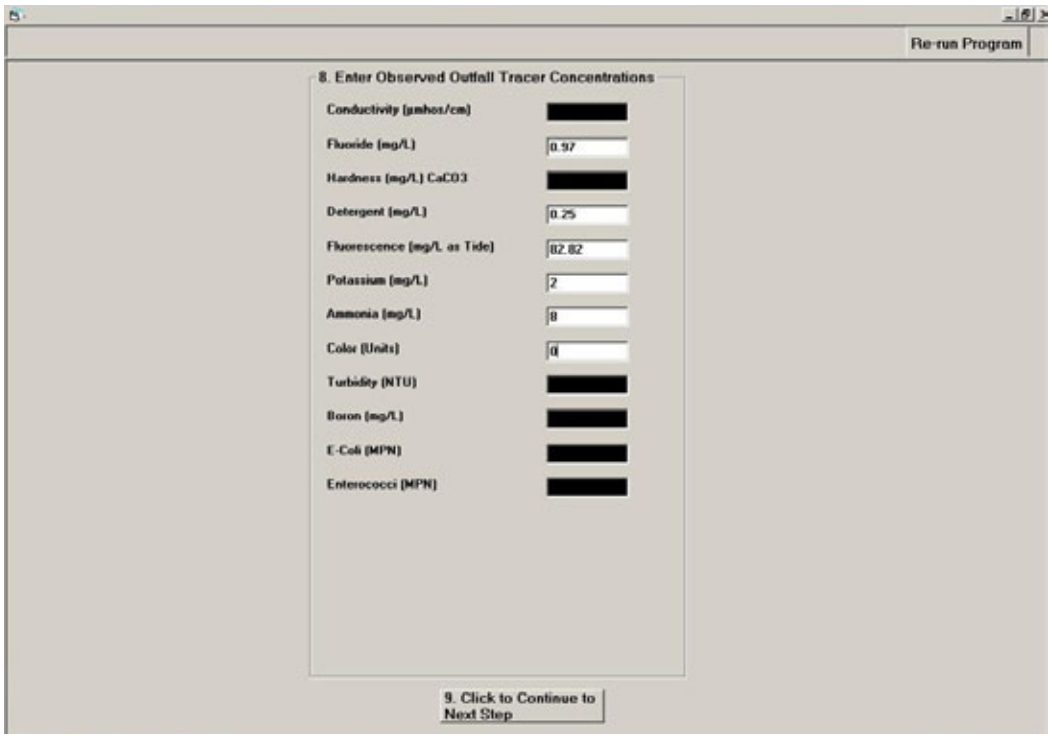


Figure I.2: Form-2 (Model inputs)

Model Outputs

The output of the model is in two forms:

- *A summary table lists the 95th percentile confidence interval (the 2.5th and the 97.5th percentile values) and the 50th percentile (median) values of the mass fraction for each source contributing to the outfall dry weather flow, as calculated by the CMBM and using the number of Monte Carlo simulations specified. This table also shows these values for an error term, μ (Mu):* This table can be saved and printed by selecting the options in the third form. In order to print the table (a small Excel spreadsheet), it must first be saved on the computer.

- *A probability plot of the calculated mass fractions for each selected source flow and also for the error term, μ (Mu)*: This plot (see Figure I.3) can be saved and printed by selecting the options in the third form. In order to print each figure, they must first be selected and saved on the computer.

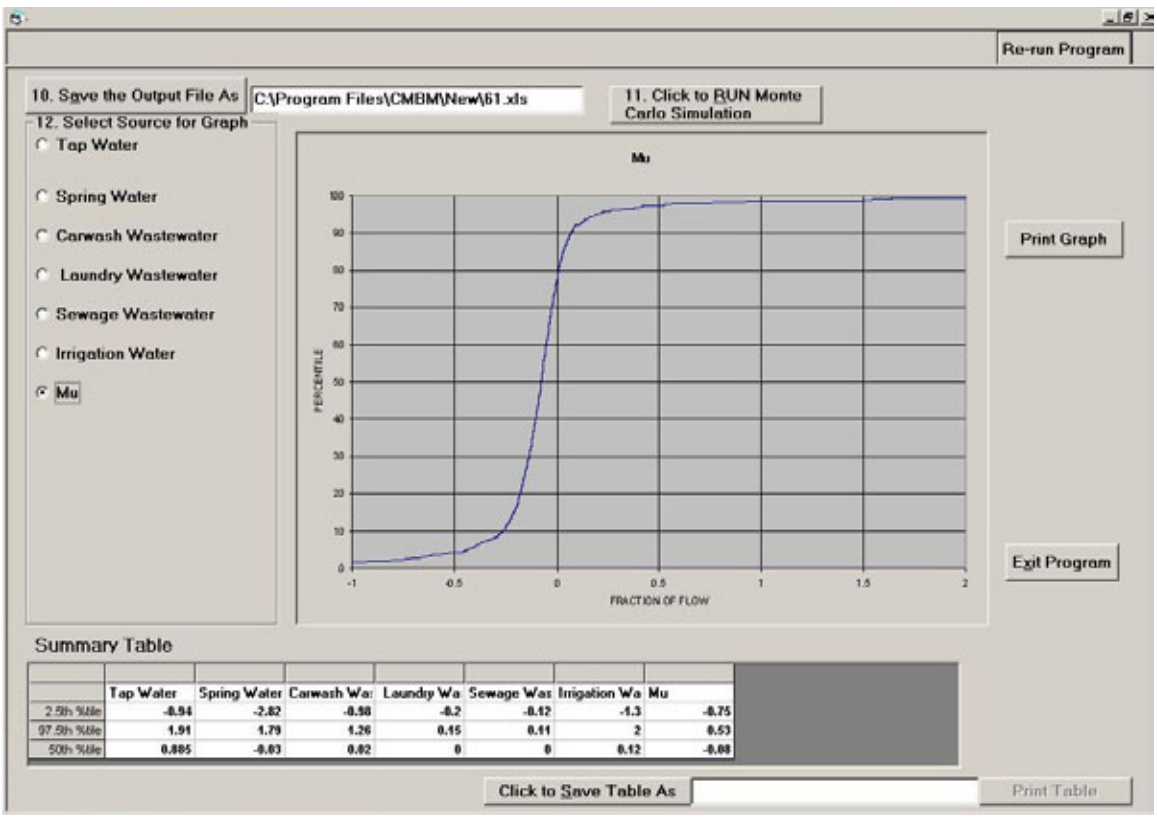


Figure I.3: Form-3 (Model output)

Library File Format

This model recognizes the source file for evaluation, only when it is in a specific format in an Excel spreadsheet.

- The data for each source is entered in an Excel file, with a separate worksheet being used for each individual source. Worksheets should be named according to the source (e.g., tap water, spring water, sewage, etc.)
- The first column of the Excel data sheet must contain the names of the tracers, starting with the second row, the second column must contain values of mean concentration, the third column, the coefficient of variation, and the fourth column the type of distribution. "N" is for "normal", or Gaussian, distributions, while "L" if for log-normal distributions. Figure I.4 is an example spreadsheet file for source area library flows.

Tracer	Mean Concentration	COV	Distribution
Conductivity (µmhos/cm)	274.67	0.46	N
Fluoride (mg/L)	1.23	1.57	L
Hardness (mg/L) $CaCO_3$	71.17	0.27	N
Detergent (mg/L)	140.91	0.21	N
Fluorescence (mg/L as Tide)	90.98	0.47	N
Potassium (mg/L)	3.58	0.67	L
Ammonia (mg/L)	0.90	1.42	L
Color (Units)	100.00	0.01	N
Turbidity (NTU)	156.81	0.78	N
Boron (mg/L)	0.65	0.74	L
E-Coli (MPN)	100.00	0.00	L
Enterococci (MPN)	10.00	0.00	L

Figure I.4: Excel Sheet in Library File

Example Problems

Example 1
This first example illustrates a verification procedure that is used to ensure the model is functioning as expected. It assumes the analysis of an undiluted flow.

Consider an outfall, which has the same data for the tracer parameters as were observed at the sewage treatment plant (which is the same as the library data for sewage wastewater). This means that the model must predict the most likely source component to be sewage and with a predicted fraction of flow for sewage close to one.

The library file used here is the Birmingham library file 'Library_BHM.xls' (which is included with the program). Let the number of Monte Carlo simulations considered be 1000, and the number of sources selected for evaluation be 4 (sewage wastewater, tap water, spring water, and landscape irrigation runoff). The tracers selected are conductivity, fluoride, potassium and ammonia. Figure I.5 shows these corresponding entries, while Figure I.6 shows the Excel spreadsheet for the library file used.

Figure I.7 shows the entries made in the second form. It should be noted that the values for the tracers entered are the same as those in the library file for sewage.

Figure I.8 shows the output form. The 50th percentile value for Sewage Wastewater flow in the summary table is 1.06, while the 95 percent confidence interval is 0.54 to 2.2. This table shows that the most likely source at the outfall is Sewage Wastewater, which is the same as the initial assumption. Also, the fraction of flow that is sewage is 1.06, very close to 1.0. Also, the sum of all 50th percentile flow contributions is 0.98, also very close to 1.0, indicating good agreement. The potential mass contributions for the other source flows are also close to zero.

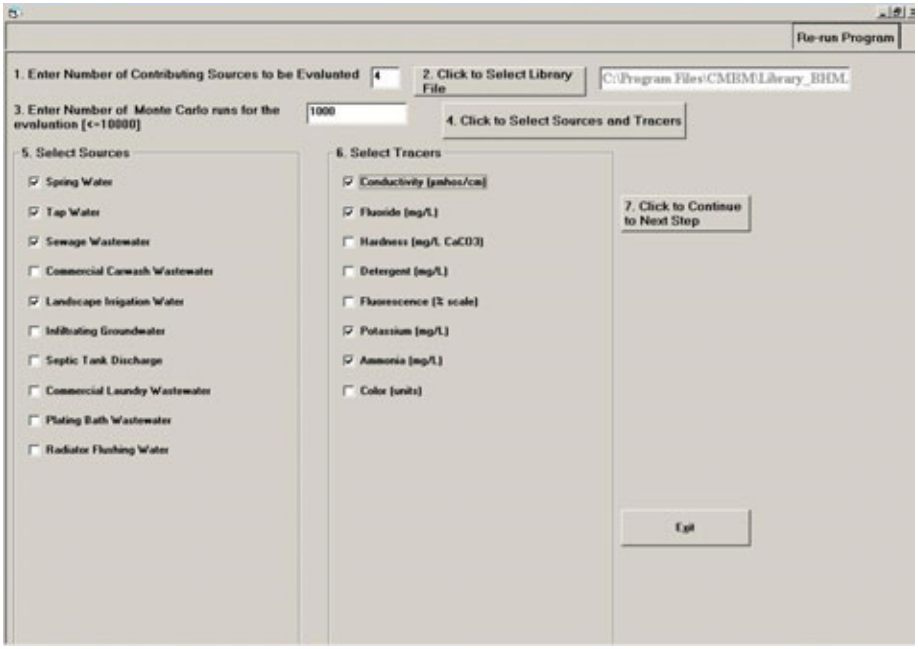


Figure I.5: Form 1 (Input for Example 1)

Tracer	Median Concentration	COV	Distribution
Conductivity (µmhos/cm)	419.86	0.13	N
Fluoride (mg/L)	0.76	0.23	N
Hardness (mg/L $CaCO_3$)	142.92	0.11	N
Detergent (mg/L)	1.5	0.82	N
Fluorescence (mg/L)	250.89	0.2	N
Potassium (mg/L)	5.97	0.23	N
Ammonia (mg/L)	9.92	0.34	L
Color (mg/L)	37.89	0.55	N

Figure I.6: Library File Excel Sheet (Sewage Wastewater)

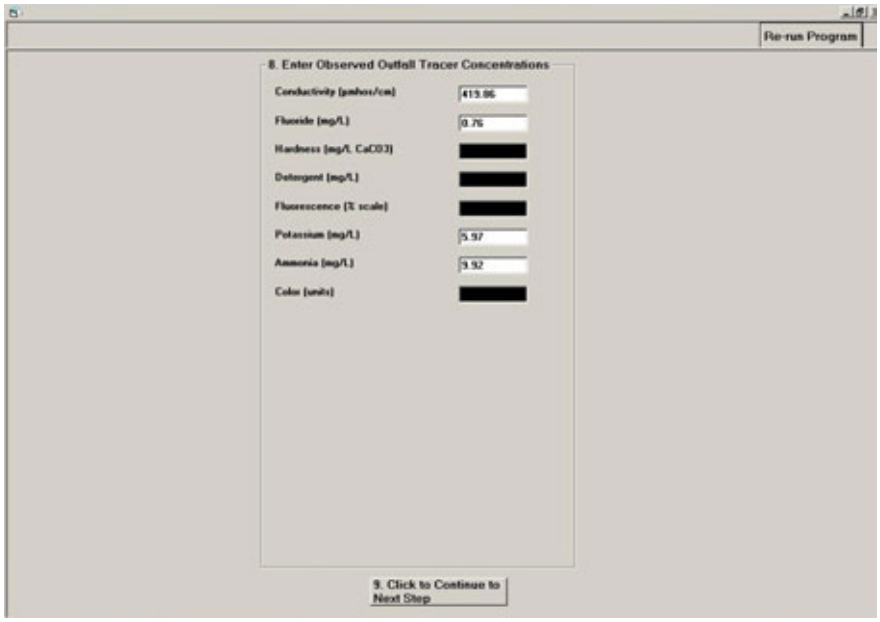


Figure I.7: Form 2 (Input)

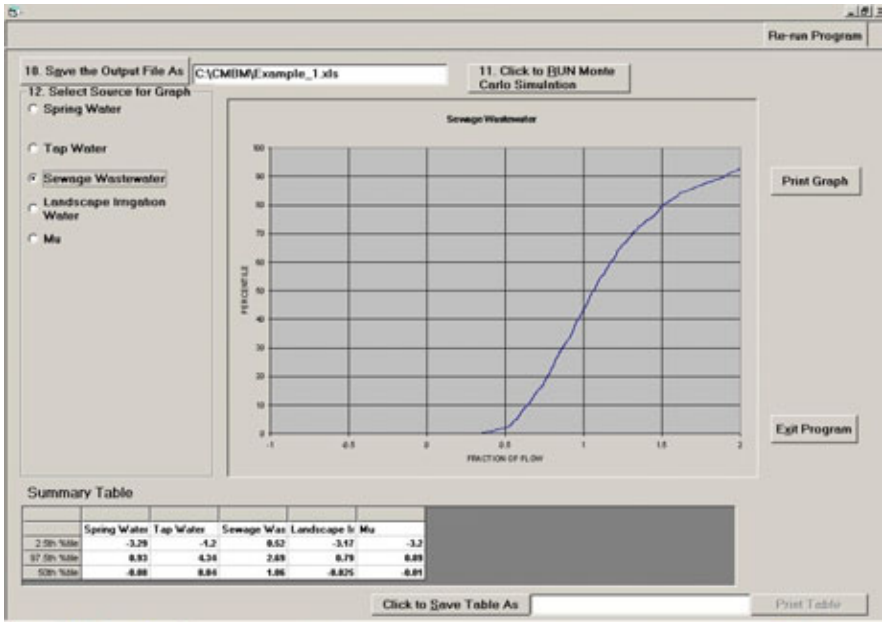


Figure I.8: Form 3 (Output for Example 1)

Example 2
In this example, eight possible source types and eight tracer parameters are selected, based on sample data from outfall # 20 in Birmingham, AL, collected on March 3, 1993.

The library file used in this example is also the Birmingham library file: 'Library_BHM.xls'. Let the number of Monte Carlo simulations be 1000, the number of sources selected for evaluation be 7 (spring water, tap water, sewage wastewater, commercial carwash wastewater, landscape irrigation water, infiltrating groundwater, and septic tank discharge. The seven tracers selected are conductivity, fluoride, hardness, detergents, fluorescence, potassium, and ammonia.

Figure I.9 shows all the corresponding entries using this information. Figure I.10 shows the entries made in the second form. Figure I.11 shows the output form. The fraction of flow as indicated for the 50th percentile value for tap water on the summary table is the highest value (0.72) compared to the other potential source flows. This indicates that the most likely source at the outfall is tap water, as verified through field observations. The spring water mass fraction is also relatively high (0.42), indicating that this source water may also be present.

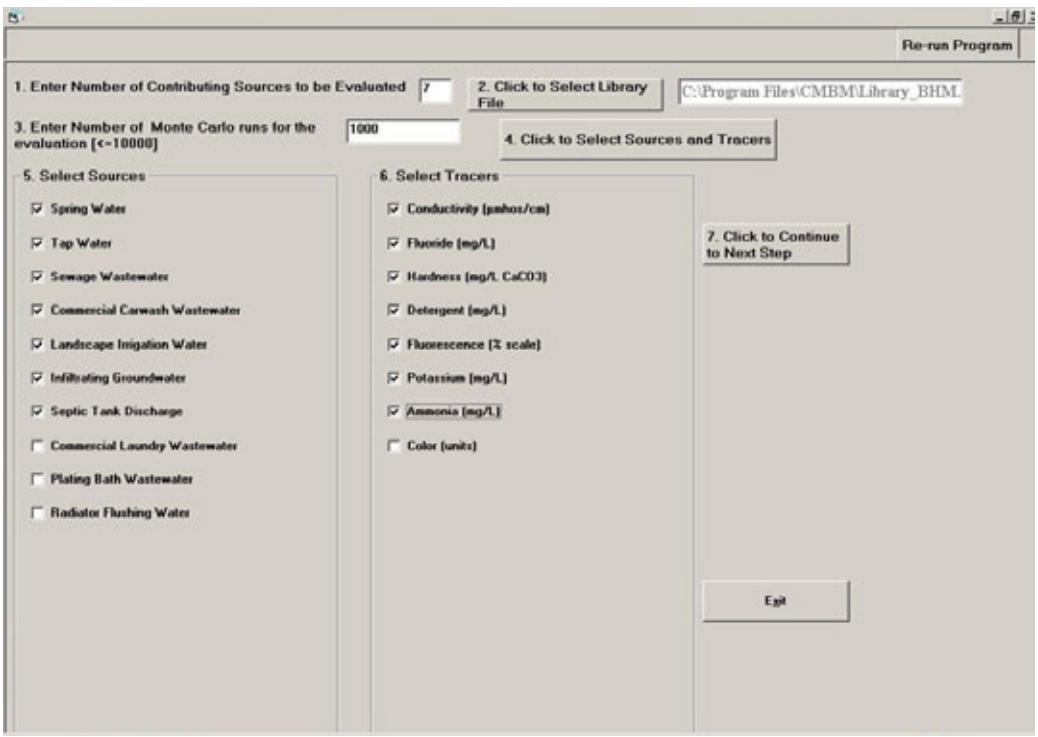


Figure I.9: Form 1 (Input for Example 2)

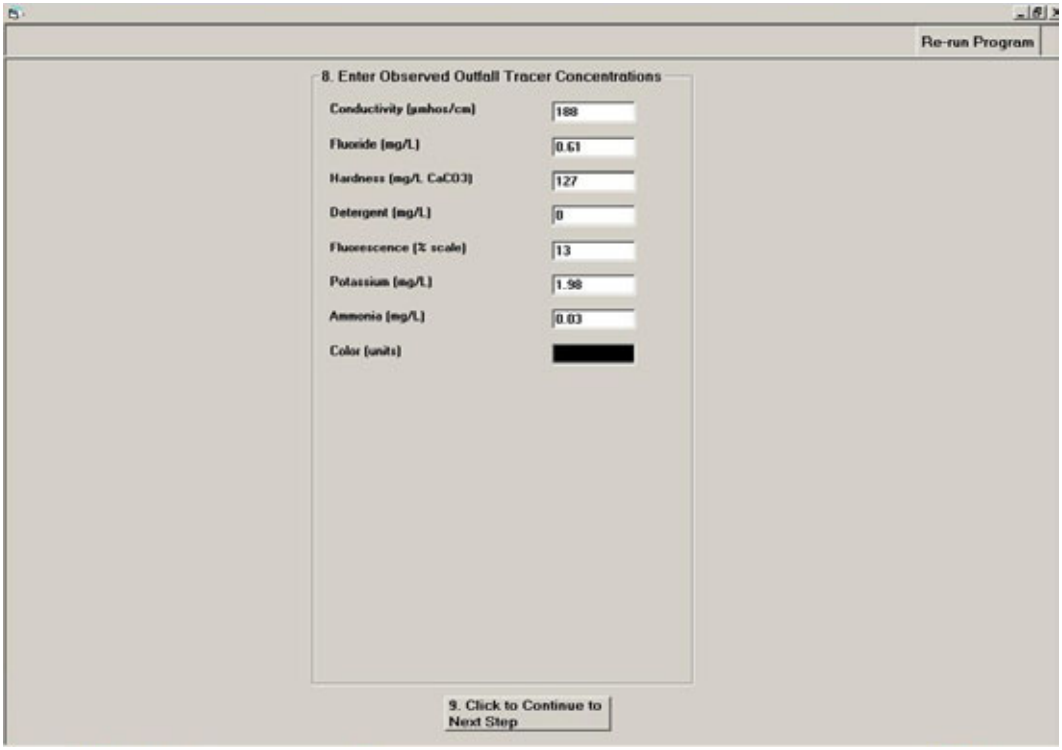


Figure I.10: Form 2 (Input for Example 2)

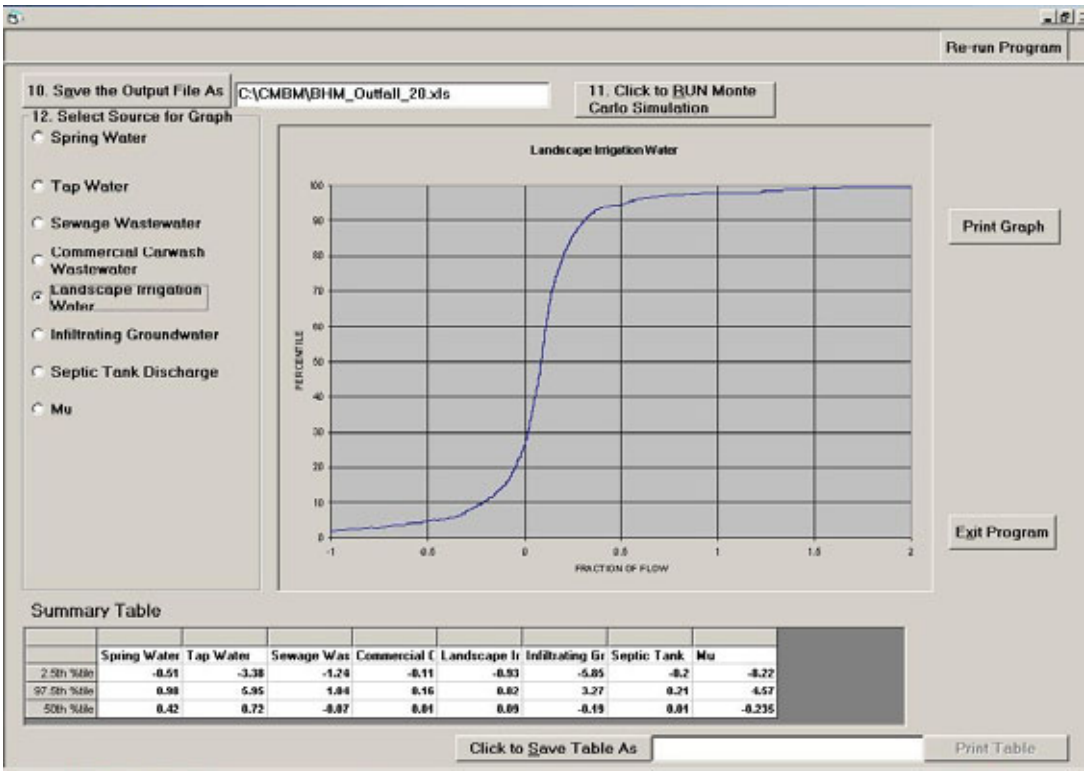


Figure I.11: Form 3 (Output for Example 2)

APPENDIX J

USING THE CHEMICAL LIBRARY TO DETERMINE THE UTILITY OF BORON AS AN INDICATOR OF ILLICIT DISCHARGES

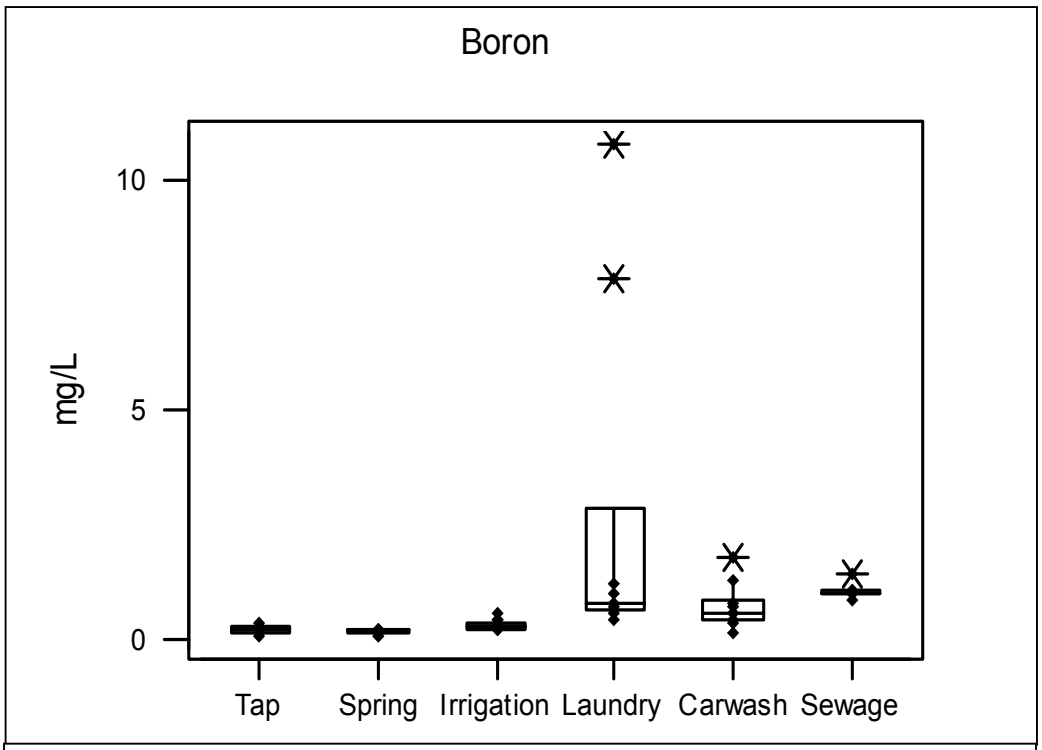
Introduction

In this example, library data from several flow types are analyzed to determine a good cut-off point to use boron as an indicator of illicit discharges. Both the data and the selected concentrations are derived from research in Tuscaloosa, Alabama (Pitt, 2004). Investigators examined the data from their chemical flow library both graphically and then in detail to select a concentration.

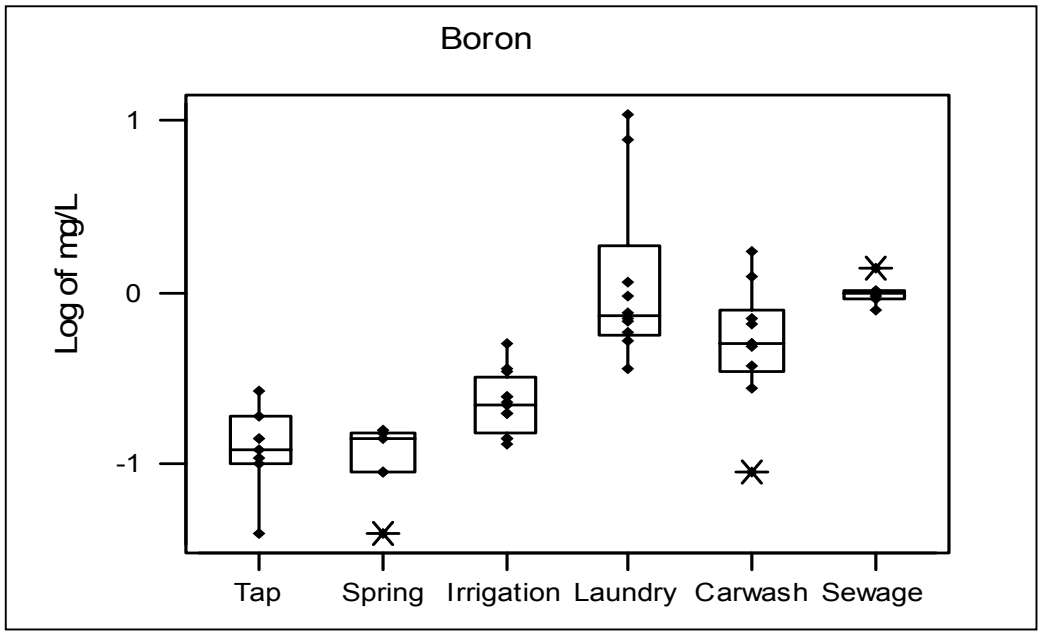
Step 1: Visually Analyze Data Using Box Plots

After collecting data from a select group of flow types, researchers assembled the data into box plots (see Plots 1 and 2). These plots help quickly identify the range of data. The "box" portion of the plot shows the first quartile, median, and third quartile for the data, and the individual data points show the data above and below this range.

A first look at the data shows that sewage, laundry, and wash water sources all have a higher concentration than the non-illicit flows: irrigation, tap water, and spring water. A closer look, using the log plot (i.e., the log of each concentration), shows some overlap between irrigation water and two of the illicit flow types: laundry and car wash. Although this overlap means that there will be some "false negatives" or "false positives" using this parameter, investigators select a concentration that is lower than the lowest concentration in laundry. This value appears to be somewhere between $10^{-0.5}$ (or 0.3 mg/L) and 10^{0} (or 1.0 mg/L).



Plot 1: Boron Concentration
(Source: Pitt, 2004)



Plot 2: Boron Concentration in Log Space
(Source: Pitt, 2004)

Step 2: Evaluate Tabular Data

The first step is a good general indicator of how to use boron as an indicator. The second step refines the initial evaluation to come up with a specific value to use as an indicator, and a numeric estimate of the number of "false positives" (i.e., identifying a non-illicit flow as illicit) and "false negatives" (i.e., identifying an illicit flow as non-illicit) that would result from using the parameter. (See Table below for the data used in this investigation).

Using data from the three sources with overlap, investigators select a concentration of >0.35 mg/L as an indicator of sewage or wash water. (This value captures all laundry flows). Using this value, two of 12 irrigation samples are identified as illicit (a 17% false positive rate) and two of 10 car wash samples are not captured as an illicit discharge (a 20% false negative rate).

Boron Concentration (mg/L) For Six Flow Types (Concentrations >0.35 mg/L indicate illicit discharges)					
Tap Water	**Spring Water**	**Irrigation**	**Laundry**	**Car Wash**	**Sewage**
0.04	0.04	0.13	0.36	0.09	0.78
0.1	0.09	0.14	0.53	0.28	0.93
0.11	0.09	0.14	0.58	0.37	0.97
0.12	0.14	0.2	0.67	0.48	0.98
0.14	0.15	0.2	0.7	0.5	1.01
0.19	0.15	0.22	0.75	0.5	1.05
0.27	0.16	0.23	0.97	0.65	1.38
		0.25	1.16	0.7	
		0.25	7.9	1.23	
		0.35	10.8	1.74	
		0.36			
		0.5			

Yellow shading indicates a false positive.

Pink shading indicates a false negative.

Source: Pitt (2004)

Step 3: Make a Determination

Based on these data, boron shows high promise as an indicator of illicit discharges. It correctly categorizes all flows from tap water, spring water, laundry and sewage, and has fairly low false positive or negative rates for identifying irrigation and car wash discharges. One potential concern, however, is that dilution occurring at the outfall may mask some illicit discharges. For example, a 50% dilution with spring water (using the median concentration of 0.14 mg/L) would result in a 20% false negative rate for laundry waters and a 60% false negative for car wash waters.

VERDICT: GOOD CANDIDATE FOR FLOW CHART METHOD. NEEDS FIELD TESTING!

References

Pitt, R. 2004. *Methods for Detection of Inappropriate Discharge to Storm Drain Systems.* IDDE Project Support Material.

APPENDIX K

SPECIFIC CONSIDERATIONS FOR INDUSTRIAL SOURCES OF INAPPROPRIATE POLLUTANT ENTRIES TO THE STORM DRAINAGE SYSTEM

(Adapted from Pitt, 2001)

Industrial Site Surveys

Additional pollutants associated with local commercial and industrial activities need to be monitored during outfall screening activities if these activities exist in the watersheds of interest. This monitoring will assist in identifying the classes of commercial or industrial activities responsible for the contamination. The first step in this process is to identify which industrial and commercial activities may contribute non-storm water discharges to the drainage system. The review of industrial user surveys or reports that are available needs to be done initially. It may be necessary to also send a questionnaire to industries in the watershed that are draining to the storm drainage system to identify the specific activities that may affect runoff quality and dry weather discharges. Site inspections will still be required because questionnaires may not be returned or may give incorrect details (either deliberately or unknowingly).

Industrial areas are known to contribute excessive wet-weather storm water discharges, along with contaminated dry weather entries into the storm drainage system. Therefore, additional industrial site investigations are needed to identify activities that most obviously contribute these contaminants to the storm drainage system. Figure K.1 is an example industrial site survey form prepared by the Non-Point Source and Land Management Section of the Wisconsin Department of Natural Resources (Bannerman, 2003). This form has been used to help identify industrial activities that contribute dry- and wet-weather non-storm water entries into the storm drainage system.

This form only considers outside sources that would affect the storm drainage system by entering through inlets or through sheetflow runoff into drainage channels. This sheet does not include any information concerning indoor activities, or direct plumbing connections to the storm drainage system. However, the information included on this sheet can be very helpful in devising runoff control programs for industrial areas. This information most likely affects wet-weather discharges much more than dry weather discharges. Obvious dry weather leaching or spillage problems are also noted on the form.

Table K.1 presents the types of activities in industrial areas that may contribute dry weather discharges to storm drainage systems. This table can be used to rank the most likely industries that may produce non-storm water discharges to a storm drainage system in an area. This table is used in conjunction with the industrial site survey form to catalog specific activities in the watershed that may need correction. After a listing of the candidate activities is known in the watersheds, additional tracer parameters may then be selected to add to the screening efforts.

Likely Dry Weather Discharge Characteristics for Different Industries

Chemical and Physical Properties
Table K.1 summarizes possible chemical and physical characteristics of non-storm water discharges, which could come from various industries. The properties considered are pH, total dissolved solids, odor, color, clarity, floatable materials, vegetation, and structural damage potential. The descriptions in each of these categories contain the most likely conditions for a non-storm water discharge coming from a

particular industry. It should be noted that a combination of just a few of these characteristics, or perhaps all of them, might occur at an outfall affected by a potential source. In addition, outfalls are likely to be affected by several sources simultaneously, further confusing the situation. Again, a complete watershed analysis describing the industrial and commercial facilities operating in each outfall watershed will be of great assistance in identifying which industries may be contributing harmful dry weather discharges to the storm system.

City: _____ Industry Name: _____
Site Number: _____ Photo # _____
Street Address: _____ Roll# _____
Type of industry: _____
Instructions: Fill in blanks or circle best answer in following (use back of sheet if necessary):

Material/waste Storage Areas
1. Type of material/waste: _____
2. Method of storage: pile tank dumpster other: _____
3. Area occupied by material/waste (acres): _____
4. Type of surface under material/waste: paved unpaved
5. Material/waste is disturbed: often sometimes never unsure
6. Description of spills (material, quantity & frequency): _____
7. Nearest drainage (feet) and drainage type: _____
8. Control practice: berm tarp buffer none other: _____
9. Tributary drainage area, including roofs (acres): _____
10. Does storage area drain to parking lot: yes no unsure

Heavy equipment storage
1. Type of equipment: _____
2. Area covered by equipment (acres): _____
3. Type of surface under equipment: paved unpaved
4. Nearest drainage (feet) and drainage type: _____
5. Control practice: berm tarp buffer none other: _____
6. Tributary drainage area, including roofs (acres): _____
7. Does storage area drain to parking lot: yes no unsure

Air pollution
1. Description of settleable air pollutants (types & quantities): _____
2. Description of particulate air pollutant controls: _____

Railroad yard
1. Size of yard (number of tracks): _____
2. General condition of yard: _____
3. Description of spills in yard (material, quantity & frequency): _____
4. Type of surface in yard: paved unpaved
5. Nearest drainage (feet) and drainage type: _____
6. Type of control practice: berm buffer other: _____
7. Does yard drain to parking lot: yes no unsure
8. Tributary drainage area, including roofs (acres): _____

Loading Docks
1. Number of truck bays: _____
2. Type of surface: paved unpaved
3. Description of spills in yard (material, quantity & frequency): _____
4. Nearest drainage (feet) and drainage type: _____
5. Type of control practice: berm buffer other: _____
6. Does loading area drain to parking lot: yes no unsure
7. Tributary drainage area, including roofs (acres): _____

Figure K.1: Industrial Inventory Field Sheet
Source: (Source: Bannerman, 2003)

Table K.1: Chemical and Physical Properties of Industrial Non-Storm Water Discharges									
Industrial Categories Major Classifications SIC Group Numbers	**Odor**	**Color**	**Turbidity**	**Floatables**	**Debris and Stains**	**Structural Damage**	**Vegetation**	**pH**	**Total Dissolved Solids**
Primary Industries									
20: Food and Kindred Products									
201 Meat Products	Spoiled Meats, Rotten Eggs and Flesh	Brown to Reddish-Brown	High	Animal Fats, Byproducts, Pieces of Processed Meats	Brown to Black	High	Flourish	Normal	High
202 Dairy Products	Spoiled Milk, Rancid Butter	Gray to White	High	Animal Fats, Spoiled Milk Products	Gray to Light Brown	High	Flourish	Acidic	High
203 Canned and Preserved Fruits and Vegetables	Decaying Products Compost Pile	Various	High	Vegetable Waxes, Seeds, Skins, Cores, Leaves	Brown	Low	Normal	Wide Range	High
204 Grain Mill Products	Slightly Sweet & Musty, Grainy	Brown to Reddish Brown	High	Grain Hulls and Skins, Straw & Plant Fragments	Light Brown	Low	Normal	Normal	High
205 Bakery Products	Sweet and or Spoiled	Brown to Black	High	Cooking Oils, Lard, Flour, Sugar	Gray to Light Brown	Low	Normal	Normal	High
206 Sugar and Confectionary Products	NA	NA	Low	Low Potential	White Crystals	Low	Normal	Normal	High
207 Fats and Oils	Spoiled Meats, Lard or Grease	Brown to Black	High	Animal Fats, Lard	Gray to Light Brown	Low	Normal	Normal	High
208 Beverages	Flat Soda, Beer or Wine, Alcohol, Yeast	Various	Mod.	Grains, Hops, Broken Glass, Discarded Canning Items	Light Brown	High	Inhibited	Wide Range	High
21: Tobacco Manufactures	Dried Tobacco, Cigars, Cigarettes	Brown to Black	Low	Tobacco Stems & Leaves, Papers and Fillers	Brown	Low	Normal	Normal	Low
22: Textile Mill Products	Wet Burlap, Bleach, Soap, Detergents	Various	High	Fibers, Oils, Grease	Gray to Black	Low	Inhibited	Basic	High
23: Apparel and Other Finished Products	NA	Various	Low	Some Fabric Particles	NA	Low	Normal	Normal	Low
Material Manufacture									
24: Lumber & Wood Products	NA	NA	Low	Some Sawdust	Light Brown	Low	Normal	Normal	Low
25: Furniture & Fixtures	Various	Various	Low	Some Sawdust, Solvents	Light Brown	Low	Normal	Normal	Low
26: Paper & Allied Products	Bleach, Various Chemicals	Various	Mod.	Sawdust, Pulp Paper, Waxes, Oils	Light Brown	Low	Normal	Wide Range	Low
27: Printing, Publishing, and Allied Industries	Ink, Solvents	Brown to Black	Mod.	Paper Dust, Solvents	Gray to Light Brown	Low	Inhibited	Normal	High
31: Leather & Leather Products	Leather, Bleach, Rotten Eggs or Flesh	Various	High	Animal Flesh & Hair, Oils, Grease	Gray to Black, Salt Crystals	High	Highly Inhibited	Wide Range	High
33: Primary Metal Industries	Various	Brown to Black	Mod.	Ore, Coke, Limestone, Millscale, Oils	Gray to Black	High	Inhibited	Acidic	High

Table K.1: Chemical and Physical Properties of Industrial Non-Storm Water Discharges									
Industrial Categories Major Classifications SIC Group Numbers	**Odor**	**Color**	**Turbidity**	**Floatables**	**Debris and Stains**	**Structural Damage**	**Vegetation**	**pH**	**Total Dissolved Solids**
34: Fabricated Metal Products	Detergents, Rotten Eggs	Brown to Black	High	Dirt, Grease, Oils, Sand, Clay Dust	Gray to Black	Low	Inhibited	Wide Range	High
32: Stone, Clay, Glass, and Concrete Products	Wet Clay, Mud, Detergents	Brown to Reddish-Brown	Mod.	Glass Particles Dust from Clay or Stone	Gray to Light Brown	Low	Normal	Basic	Low
Chemical Manufacture									
28: Chemicals & Allied Products									
2812 Alkalies and Chlorine	Strong Halogen or Chlorine, Pungent, Burning	Alkalies – NA; Chlorine - Yellow to Green	Low	NA	Alkalies – White Carbonate Scale Chlorine - NA	High	Highly Inhibited	Basic	High
2816 Inorganic Pigments	NA	Various	High	Low Potential	Various	Low	Highly Inhibited	Wide Range	High
282 Plastic Materials and Synthetics	Pungent, Fishy	Various	High	Plastic Fragments, Pieces of Synthetic Products	Various	Low	Inhibited	Wide Range	High
283 Drugs	NA	Various	High	Gelatin Byproducts for Capsulating Drugs	Various	Low	Highly Inhibited	Normal	High
284 Soap, Detergents & Cleaning Preparations	Sweet or Flowery	Various	High	Oils, Grease	Gray to Black	Low	Inhibited	Basic	High
285 Paints, Varnishes, Lacquers, Enamels and Allied Products (SB - Solvent Base)	Latex - Ammonia SB - Dependent Upon Solvent (Paint Thinner, Mineral Spirits)	Various	High	Latex - NA SB - All Solvents	Gray to Black	Low	Inhibited	Latex-Basic SB - Normal	High
286 Indust. Organic Chemicals									
2861 Gum and Wood Chemicals	Pine Spirits	Brown to Black	High	Rosins and Pine Tars	Gray to Black	Low	Inhibited	Acidic	High
2865 Cyclic Crudes, & Cyclic Intermediates Dyes, & Organic Pigments	Sweet Organic Smell	NA	Low	Translucent Sheen	NA	Low	Highly Inhibited	Normal	Low
287 Agricultural Chemicals									
2873 Nitrogenous Fertilizers	NA	NA	Low	NA	White Crystalline Powder	High	Inhibited	Acidic	High
2874 Phosphatic Fertilizers	Pungent Sweet	Milky White	High	NA	White Emorphous Powder	High	Inhibited	Acidic	High
2875 Fertilizers, Mixing Only	Various	Brown to Black	High	Pelletized Fertilizers	Brown Emorphous Powder	Low	Normal	Normal	High
29: Petroleum Refining and Related Industries									
291 Petroleum Refining	Rotten Eggs, Kerosene, Gasoline	Brown to Black	High	Any Crude or Processed Fuel	Black Salt Crystals	Low	Inhibited	Wide Range	High

Table K.1: Chemical and Physical Properties of Industrial Non-Storm Water Discharges									
Industrial Categories Major Classifications SIC Group Numbers	**Odor**	**Color**	**Turbidity**	**Floatables**	**Debris and Stains**	**Structural Damage**	**Vegetation**	**pH**	**Total Dissolved Solids**
30 Rubber & Miscellaneous Plastic Products	Rotten Eggs, Chlorine, Peroxide	Brown to Black	Mod.	Shredded Rubber Pieces of Fabric or Metal	Gray to Black	Low	Inhibited	Wide Range	High
Transportation & Construction									
15 Building Construction	Various	Brown to Black	High	Oils, Grease, Fuels	Gray to Black	Low	Normal	Normal	High
16 Heavy Construction	Various	Brown to Black	High	Oils, Grease, Fuels, Diluted Asphalt or Cement	Gray to Black	Low	Normal	Normal	High
Retail									
52 Building Materials, Hardware, Garden Supply, and Mobil Home Dealers	NA	Brown to Black	Low	Some Seeds, Plant Parts, Dirt, Sawdust, or Oil	Light Brown	Low	Normal	Normal	Low
53 Gen. Merchandise Stores	NA	NA	NA	NA	NA	Low	Normal	Normal	Low
54 Food Stores	Spoiled Produce, Rancid, Sour	Various	Low	Fragments of Food, Decaying Produce	Light Brown	Low	Flourish	Normal	Low
55 Automotive Dealers & Gasoline Service Stations	Oil or Gasoline	Brown to Black	Mod.	Oil or Gasoline	Brown	Low	Inhibited	Normal	Low
56 Apparel & Accessory Stores	NA	NA	Low	NA	NA	Low	Normal	Normal	Low
57 Home Furniture, Furnishings, & Equip. Stores	NA	NA	Low	NA	NA	Low	Normal	Normal	Low
58 Eating & Drinking Places	Spoiled Foods Oil & Grease	Brown to Black	Low	Spoiled or Leftover Foods	Brown	Low	Normal	Normal	Low
Coal Steam Electric Power	NA	Brown to Black	High	Coal Dust	Black Emorphous Powder	Low	Normal	Slightly Acidic	Low
Nuclear Steam Electric Power	NA	Light Brown	Low	Oils, Lubricants	Light Brown	Low	Normal	Normal	Low

Other Chemicals Indicative of Manufacturing Industrial Activities
Table K.2 lists the various chemicals that may be associated with a variety of different industrial activities. It may be possible to examine non-storm water outfall flow for specific chemicals, such as shown on this list to identify which specific manufacturing industrial activities may be contributing the flows.

Example Problems for Locating an Industrial Source

Locating An Industrial Source
Hypothetical examples have been created to demonstrate how dry weather discharges can be characterized so that their likely industrial sources can be identified. These examples show how observations of outfall conditions and simple chemical analyses, combined with a basic knowledge of wastewater characteristics of industrial and commercial operations located in the drainage area can be used to identify the possible pollutant sources. The initial activities include pollutant analyses of outfalls being investigated. This requires the characterization on the non-storm water flows, the identification of the likely industries responsible for the observed discharges, and finally, locating the possible specific sources in the watershed.

The industries identified in a hypothetical storm water drainage area (from the watershed analysis) included a vegetable cannery, general food store, fast food restaurant, cheese factory, used car dealer, cardboard box producer, and a wood treatment company. The methods used to determine the most likely industrial source of the dry weather discharges are considered for three hypothetical situations of outfall contamination.

Case Example 1
The hypothetical results of the pollutant analysis for the first situation found constant dry weather flow at the outfall. The measurements indicated a normal pH (6) and low total dissolved solids concentrations (300 mg/L). Other outfall characteristics included a strong odor of bleach, no distinguishing color, moderate turbidity, sawdust floatables, a small amount of structural corrosion, and normal vegetation.

The significant characteristic in this situation is the sawdust floatables (see Figure K.2). The industries that could produce sawdust and have dry weather flow drainage to this pipe are the cardboard box company and the wood treatment company. According to their SIC codes, these companies would fall under the category of "Paper and Wood Products." Looking up these two industries by their corresponding SIC group numbers in Table K.1 and comparing the listed properties indicates that the paper industry has a strong potential for the odor of bleach. Wood products does not indicate any particular smell.

Based upon these data, the most likely industrial source of the non-storm water discharge would be the cardboard box company. Table A.1 (Appendix A) indicates a high potential for direct connections at paper and wood product facilities. At this point, further testing should be conducted at the cardboard box company to determine if the constant source of contamination is coming from cooling waters, process waters, or direct piping connections (process waters are the most likely source, given the bleach and sawdust characteristics).

Table K.2: Significant Chemicals in Industrial Wastewaters	
Chemical	**Industry**
Acetic acid	Acetate rayon, pickle and beetroot manufacture
Alkalies	Cotton and straw kiering, cotton manufacture, mercerizing, wool scouring, laundries
Ammonia	Gas and coke manufacture, chemical manufacture
Arsenic	Sheep-dipping, fell mongering
Chlorine	Laundries, paper mills, textile bleaching
Chromium	Plating, chrome tanning, aluminum anodizing
Cadmium	Plating
Citric acid	Soft drinks and citrus fruit processing
Copper	Plating, pickling, rayon manufacture
Cyanides	Plating, metal cleaning, case-hardening, gas manufacture
Fats, oils	Wool scouring, laundries, textiles, oil refineries
Fluorides	Gas and coke manufacture, chemical manufacture, fertilizer plants, transistor manufacture, metal refining, ceramic plants, glass etching
Formalin	Manufacture of synthetic resins and penicillin
Hydrocarbons	Petrochemical and rubber factories
Hydrogen peroxide	Textile bleaching, rocket motor testing
Lead	Battery manufacture, lead mining, paint manufacture, gasoline, manufacture
Mercaptans	Oil refining, pulp mills
Mineral acids	Chemical manufacture, mines, Fe and Cu pickling, brewing, textiles, photo-engraving, battery manufacture
Nickel	Plating
Nitro compounds	Explosives and chemical works
Organic acids	Distilleries and fermentation plants
Phenols	Gas and coke manufacture; synthetic resin manufacture; textiles; tanneries; tar, chemical, and dye manufacture; sheep-dipping
Silver	Plating, photography
Starch	Food, textile, wallpaper manufacture
Sugars	Dairies, foods, sugar refining, preserves, wood process
Sulfides	Textiles, tanneries, gas manufacture, rayon manufacture
Sulfites	Wood process, viscose manufacture, bleaching
Tannic acid	Tanning, sawmills
Tartaric acid	Dyeing; wine, leather, and chemical manufacture
Zinc	Galvanizing, plating, viscose manufacture, rubber process
Source: Klein (1962). *River Pollution 2: Causes and Effects*. Butterworth & Co. presented in *The Water Encyclopedia*, D. Todd, Water Information Center, Port Washington, N.Y., 1979.	

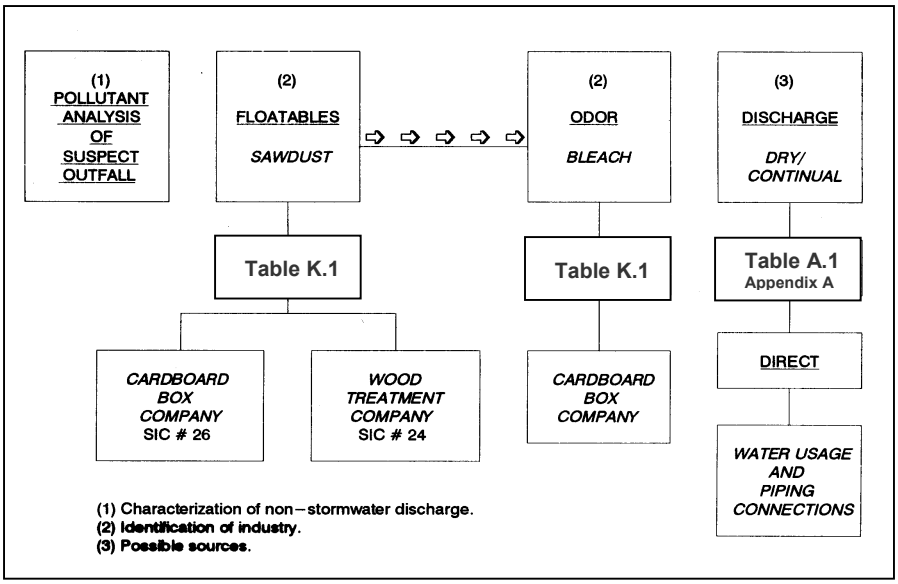


Figure K.2: Flowsheet for Case Example 1

Case Example 2

Pollutant analysis for the second situation found intermittent dry weather discharges at the outfall. The test measurements indicated an acidic pH (3) and high total dissolved solids concentrations (approximately 6,000 mg/L). Other characteristics included a rancid-sour odor, grayish color, high turbidity, gray deposits containing white gelatin-like floatable material, structural damage in the form of spalling concrete, and an unusually large amount of plant life.

The rancid-sour smell and the presence of floatable substances at this outfall indicate that some type of food product is probably spoiling. This narrows the possible suspect industries to the fast food restaurant, cheese factory, vegetable cannery, and food store (see Figure K.3). The corresponding SIC categories for each of these industries are "Eating and Drinking Places" (SIC# 58), "Dairy Products" (SIC# 202), "Canned and Preserved Fruits and Vegetables" (SIC# 203), and "Food Stores" (SIC# 54).

Comparison of the properties listed in Table K.1 for these SIC codes indicates that elevated plant life is common to industrial wastes for the "Dairy Products" and "Food Stores" categories. However, the deciding factor is the acidic pH, which is only listed for "Dairy Products". Thus, the white gelatin-like floatables are most likely spoiled cheese byproducts from the cheese factory, which are also the probable cause of the sour-rancid smell.

Since dry weather entry to the storm drainage system occurs intermittently, flow could be caused by either a direct or indirect connection. To locate the ultimate source of this discharge coming from the cheese factory, both direct and indirect industrial situations are considered under the category of "Food Processing" with SIC code of 2020 in Table A1 (see Appendix A). Thus, further examination of the loading dock procedures, water usage, and direct piping connections should be conducted since these categories all exhibit some potential for pollution in dairy production.

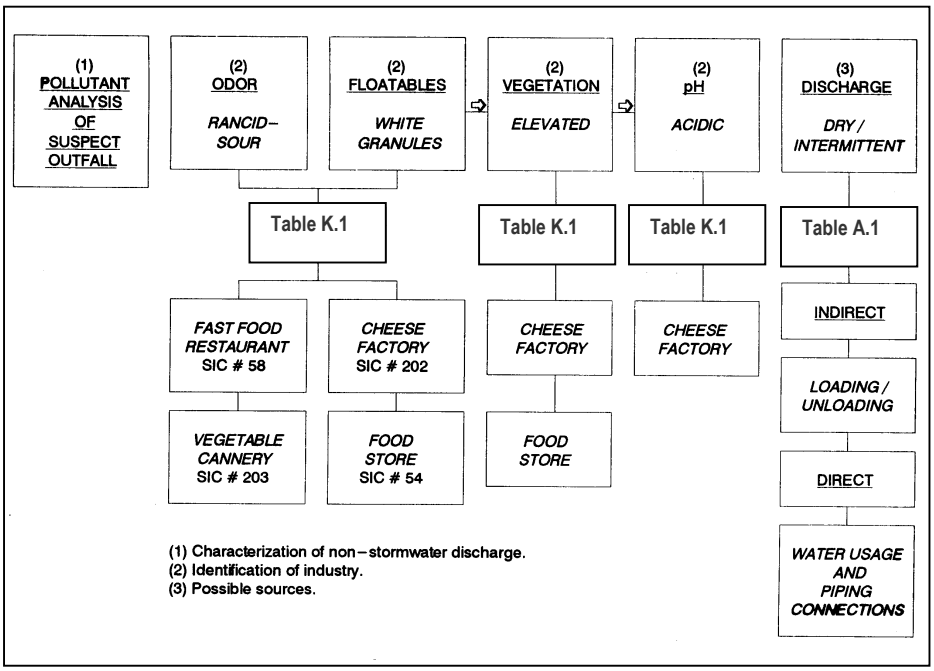


Figure K.3: Flowsheet for Case Example 2

Case Example 3

The results of the test measurements for the final situation found a normal pH (6) and low total dissolved solids (about 500 mg/L). Signs of contaminated discharges were found at the outfall only during and immediately following rainfalls. Other outfall properties observed included an odor of oil, deep brown to black color, a floating oil film, no structural damage, and inhibited plant growth (see Figure K.4).

According to Table K.1, the fast food restaurant and the used car dealer are the only two industrial sources in this hypothetical drainage area with a high potential for causing oily discharges. Their respective SIC categories are "Eating and Drinking Places" (SIC# 58) and "Automotive Dealers" (SIC# 55). Comparison of the properties shown in Table K.1 indicates inhibited vegetation only for the second category. Thus, the most likely source of the discharge is the used car dealer.

Furthermore, the source of contamination must likely be indirect, since the discharge occurs only during wet weather. Reference to Table A.1 (see Appendix A) under the category of "Car Dealers," indicates a medium potential for indirect contamination. This fact, plus the knowledge that most used cars are displayed outdoors, makes it clear that surface runoff is probably carrying spilled automotive oil into the storm drain during rains.

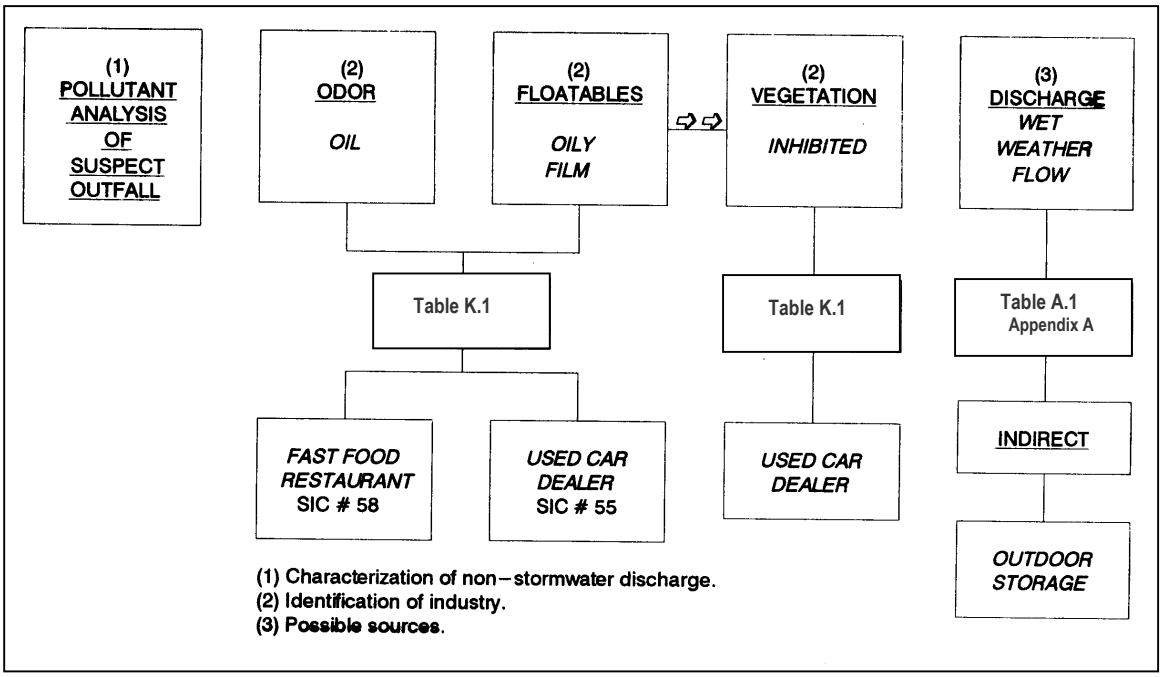


Figure K.4: Flowsheet for Case Example 3

References

Bannerman, R. 2003. Personal communication with Dr. Robert Pitt, University of Alabama.

Klein, L. 1962. "River Pollution 2: Causes and Effects." in D. Todd. 1979. The Water Encyclopedia. Water Information Center. Port Washington, N.Y.

Pitt, R. 2001. *Methods for Detection of Inappropriate Discharges to Storm Drainage Systems: Background Literature and Summary of Findings*. IDDE Project Support Material.