DRAFT

May 18, 2011

Mr. Larry Gaugler, P.E., Acting Team Leader
NPDES Team
Division of Enforcement and Compliance Assistance
290 Broadway, 20th Floor
New York, NY 10007-1868

Mr. Joseph DiMura, P.E.
Director, Bureau of Water Compliance Programs
Division of Water
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-3506

Re: ADMINISTRATIVE ORDER CWA-02-2011-3022
Village of Mamaroneck
SPDES PERMIT NO. NYR20A233

Dear Mr.Gaugler:

Pursuant to Administrative Order CWA-02-2011-3022 the following is our proposed Illicit Discharge Detection and Elimination Plan.

ILLICIT DISCHARGE DETECTION and ELIMINATION PLAN

The following plan of action shall be taken by the Village of Mamaroneck, New York, utilizing municipal staff and the services of the Village Engineering consulting firm, Dolph Rotfeld Engineering PC(DRE).

1. Identify those segments of the Village's MS-4's storm water conveyance system (pipes, catch basins and manholes) associated with the individual outfalls identified by the EPA as discharging flow which appeared to contain total and fecal coliforms in excess of NYState water quality standards.

   Conduct water quality testing, utilizing the protocol which USEPA personnel used in the MS-4 Storm Water Sampling Report, dated September 30, 2010, which identified the discharge of pathogens, or other protocols as directed by the NYSDEC in its Illicit Discharge Detection and Elimination (IDDE) of the MS-4 Regulations.

2. Utilizing the Village's Storm Water and Sanitary Sewer System Mapping, continue sampling upstream from the outfalls and from points where major system segments converge so as to eliminate segments determined not to be contributing to flow identified possibly as being sanitary sewage. This is the plan of initial action as outlined in Attachment "A".

3. Those segments that indicate a high potential for containing illicit sanitary sewer connections to the storm sewers will be subject to inspection by video camera. DRE has had success with this method to identify and subsequently eliminate sanitary sewage from the storm drainage system. Any flow entering the storm sewers during a period after three days of a rain event (dry weather flow) will be subject to dye testing and further sampling. Arrangements for DNA testing will be discussed with USEPA and several academic institutions that have had success with differentiating between human and animal sources of pathogens. This may require four to six months for completion.

4. Identify the source of suspected illicit discharges and prepare engineering plans to eliminate the condition causing the introduction of pathogens into the storm water system.

5. The storm water system shall be cleaned after the elimination of the illicit connection and samples taken to determine the level of pathogens present.

6. Records shall be kept of the IDDE operation. Progress reports will be prepared and presented as in the past submitted at quarterly meetings sponsored by the NYSDEC.

Please advise of your determination as to acceptability of the Plan or any comments you may have. Thank you for your cooperation with the Village efforts.

Very truly yours,

Dolph Rotfeld, P.E., BCEE
President

C: J. Ciotola, EPA Region 2
P. Ferracane, NYSDEC

"Attachment "A"

Illicit Discharge Detection and Elimination Plan
Village of Mamaroneck
Initial Action

Sampling and Testing

Sampling will be beginning at the locations noted below as first priority. These locations include those sampled by the USEPA and additional sites that contribute flow to the drainage area. Additional testing will be done upstream at key manholes and at segments that show pollution. Tests will be made for fecal coliform and total coliform at each sampling location. DNA samples may also be taken to assist in determining the source of the coliform whether it is of human or non-human origin.

Sampling will be performed in both wet weather and dry weather after three days of no rain. The results will then be tabulated and analyzed for possible sources of illicit discharges.

Inspections

- Visual inspections will be made of all storm water system structures at and tributary to the above locations, during dry weather at least three days after an end to a rainfall event.

- Where sampling indicates a possible source of illicit discharge a subsequent investigations will be performed. Both storm sewers and sanitary sewers within the drainage area will be televised to ascertain the condition of the pipe. Where a suspect connection or compromised pipe is discovered a dye test will be performed to verify the source. In addition, catch basins contributing to the suspect line will be inspected for illegal dumping or deleterious flows.