

## ***POLICY STATEMENT***

Private I/I Public Education, Outreach and Enforcement Program  
Exeter, New Hampshire  
April 20, 2015

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### TOWN ORDINANCE

*Article 1506.1:*

*No person shall discharge or cause to be discharged any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated cooling water, or unpolluted industrial process waters to any sanitary sewer.*

*Article 1502.1:*

*The Owner shall thereafter be obligated to pay all costs and expenses of operation, repair and maintenance and of reconstruction (if necessary) of the Building Sewer beginning at the main of the Sewer System and ending at the building.*

*This means that each property owner is accountable that they don't direct drainage to the sewer (roof leaders, driveway drains, sump pumps, foundation drains, etc.) and that their sewer lateral does not leak.*

### TOWN NPDES Permit No. NH0100871

*Section C(5)(f & g):*

*The permittee shall develop and implement...An ongoing program to identify and remove sources of I/I. The program shall include an inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof downspouts; and an educational public outreach program for all aspects of I/I control, particularly private inflow.*

Background and Purpose:

- Infiltration and Inflow (I/I) is essentially clean water (non-sanitary) that enters the sewer. Common sources of I/I include:
  - Stormwater inflow from roof drains, catch basins, yard drains, etc. connected to the sewer
  - Groundwater infiltration/inflow from leaking sewer pipes (including private service laterals), leaking sewer manholes, sump pumps connected to the sewer, foundation drains connected to the sewer, etc.
- The Town's *Phase III Infiltration and Inflow (I/I) Evaluation* by Underwood Engineers, Inc. (2013) identified that approximately 60% of the I/I observed in the Town's wastewater collection system appeared to be from private sources.
- Private I/I must be mitigated to achieve the Town's goal to eliminate Combined Sewer Overflow (CSO) discharges to the environment and optimize wastewater conveyance and treatment costs.

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- Town Ordinances prohibit discharge of private I/I to the sewer. However, historically there has been limited enforcement of the ordinance or compliance inspections.
  - Removal of private sources of I/I is essential and also cost effective for the Town to mitigate CSO discharges.
  - The Town endeavors to reduce private I/I in the system with an updated public education, outreach, and enforcement program; the details of which are described in this document.

#### **Public Education and Outreach Approach:**

- Town will mail an educational tri-fold brochure flier to all sewer users about how they can identify sources of private I/I on their property to facilitate completion of the “Compliance Response” (described below), and offer suggestions of how to mitigate illicit connections and private I/I.
- Accompanying the mailer will be a 1-page “Compliance Response” questionnaire asking sewer users to identify any known private I/I sources located at the property including:
  - Request for technical assistance from the Town for identification of private I/I sources and suggestions/assistance for elimination
  - Presence of any sump pumps
  - Presence of sump pumps that discharge to the sewer
  - Presence of roof leaders that discharge into the sewer and/or the ground
  - Presence of foundation drains tied to the sewer
  - Presence of defective sewer service laterals and history of sewer lateral problems
- “Compliance Responses” from users will be mailed directly to the Town’s Consulting Engineer for compilation and summary. The Town will provide self-addressed stamped envelopes for this purpose and give users 30 days to return the response.
- A non-response will be considered a statement of compliance of the Ordinance by the homeowner, unless the Town has information to the contrary. A non-response negates amnesty.

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### Compliance Inspections, Non-Compliance Notifications and Enforcement Approach:

The following table summarizes the schedule and approach for implementation of the program:

<b>Implementation Year</b>	<b>Activity/Action Description</b>
0 to 1	Develop policy document, education mailer with compliance response
0 to 5*	"Grace Period" or "Amnesty" - Town to provide technical assistance if requested and homeowners expected to take steps necessary for Sewer Use Ordinance (SUO) compliance
0 to 5	Capital Improvement Plan (CIP) considerations for potential projects to assist with illicit connection removal
5*	Enforcement actions begin
2	Town begins policy to perform house inspections (sump pumps and roof leaders) and lateral CCTV (defective laterals and foundation drains) as part of final meter readings for all property transactions and notifies buyers agent if illicit connections found
2	Town begins policy to perform house inspections and lateral CCTV: - Prior to issuance of any building permit for improvements - When an existing sanitary sewer lateral is to be used to serve a new structure - At the time of water meter replacements - At the time of property transfers - Upon specific information that the premises may be in violation of Town Ordinances
3	Town begins methodical Town-wide house inspection program using information gathered during years 0-2 to prioritize neighborhoods with suspected densities of illicit connections/lateral issues.

*\*The grace period or amnesty program only applies to questionnaire respondents.*

The notification, enforcement and confirmation procedures described in Article 1508 of the Town Ordinances will be initiated if any of the following prohibited discharges are found upon subsequent inspection after the allotted "grace period":

1. Sump pumps that discharge to the sanitary sewer
2. Roof leaders that discharge to the sanitary sewer
3. Foundation drains that discharge to the sanitary sewer
4. Defective laterals found to discharge greater than 4,000 gpd/idm infiltration to the system
5. Other illicit or prohibited discharges

### Town Assistance Summary

- The Town will perform a site visit of the property to assist the owner with illicit connection identification and completion of the "Compliance Response".

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- The Town **will not** issue users a charge for technical assistance inspections during “Grace Period” unless it involves resources outside Town Staff.
- If illicit connections are identified on a property the Town **will** offer the owner suggestions for alternate discharge locations based on existing site conditions.
- The Town **will** levy fines or surcharges to users with illicit connections that have a viable discharge location for private I/I which may include:
  - Natural drainage course on the property
  - Municipal drainage system (swales) abutting the property
  - Municipal closed drainage system in the street with drain service
  - Site conditions suitable for groundwater infiltration
- The Town **will** levy surcharges to users with illicit connections that do not have a viable discharge location for private I/I.
- The Town **may** provide a drain service stub to the edge of the roadway ROW to provide users a location for I/I disposal if a municipal drainage system is present in the street.
- The Town **may** provide financial assistance to users for evaluation and/or implementation of on-site infiltration private I/I disposal.
- The Town **may** provide financial assistance to users for replacement/rehabilitation of defective laterals.
- The Town **will** provide a confirmation inspection to document removal.
- The Town **will not** perform investigations on the site such as test pits, infiltration tests, etc. to evaluate whether groundwater infiltration is an appropriate method for I/I disposal on site.

ACCEPTED BY:

Board of Selectmen



Date 4/20/15

Department of Public Works

