

## **Appendix 2**

### **Draft 2017 MS4 Stormwater Annual Report**

#### **Water Testing**

##### **RFP for Supplemental Water Testing**



**Toni N. Harp**  
Mayor

## ENGINEERING DEPARTMENT

City of New Haven  
200 Orange Street, Rm 503  
New Haven, CT 06510  
[www.cityofnewhaven.com](http://www.cityofnewhaven.com)



August 8th, 2016

Re Request for Quotation  
Supplemental Stormwater Sampling and Testing

Dear Sir or Madam,

We are requesting quotations for storm water sampling and testing as described in the attached document. All work described there in must be completed within three months of the issue of a purchase order.

It is understood that it may not be possible to quote for all the tests listed. The format for the quotation has been set out such that zero can be inserted for tests that cannot be provided.

It may be necessary to use more than one laboratory for the PPCP tests. Additionally, the labs that undertake these tests may have detection limits that are different from those listed in the EPA protocol. When submitting a proposal the detection limits for the PPCP, enterococci and surfactants tests must be indicated (items 3 through 13).

As most of the labs undertaking PPCP work are on the west coast it is acceptable to use a different, local lab for the MS4 tests. It may also be necessary to use more than one lab for the PPCP tests.

Any questions should be addressed to Ian Jude, PE of my staff at 203 946-8094.

Quotes will be accepted up until 5.00pm on Friday August<sup>th</sup>, 2016. They can be mailed to the above address, faxed to 203 946-8093, or e-mailed to [ijuden@newhavenct.net](mailto:ijuden@newhavenct.net)

Yours Truly,

Giovanni Zinn, PE  
City Engineer

Cc File 16-146-01  
Chronos

**City of New Haven**  
**Request for Quotation**  
**Supplemental MS4 Water Testing**

**Background**

The City has PPCP (Pharmaceutical and Personal Care Products) per EPA Method 1694 test results indicating the presence of human sewage in its stormwater system, together with MS4 testing that indicates E-coli being present. The samples that have been tested were taken at or near outfalls. Because there is prolific wildlife within the city, this series of tests is aimed at estimating the extent to which the E-coli originate from wildlife by testing inflows at catch basins. It also aims to determine if any of the PPCP compounds enter the system by run-off.

**Requirements**

The sampling shall consist taking eighteen (18) grab samples at catch basins located throughout the city during the storm event prescribed by the MS4 permit. These grab samples shall be taken from the flow of water entering the catch basin immediately beneath its grating. Testing shall be as follows :-

1. All parameters listed in the MS4 permit
2. Enterococci (threshold level 61cfu/100ml) - Laboratory via approved method
3. Surfactants (as MBAS) (threshold level > 0.25mg/l) - MBAS test kit or laboratory via approved method
4. All parameters listed in Attachment 2 to the EPA New England Bacterial Source to EPA Method 1694 Tracking Protocol (subject to note below)

**Specifications**

1. See attachment 1 excerpt from MS4 permit
2. See attachment 2 for EPA New England Bacterial Source Tracking Protocol
3. Full chain of custody records shall be kept

**Notes**

For the PPCP tests it is probable that the services of more than one laboratory will be required. Division of this work or sub-contracting of the sampling is acceptable. It is also possible that some of the PPCP tests are not available, in which case the proposal shall include as many as are available.

**Catch Basins**

Catch basin locations will be provided at a later date. All sampling can be done from sidewalks without removal of gratings, and maintenance and protection of traffic is not required.

**Format of Quotation**

The proposal shall be submitted in the following format :-

Item	Unit Cost	Quantity	Extended Cost
1. Sampling	\$	18	\$
2. MS4 Test	\$	18	\$
3. Enterococci Test	\$	18	\$
4. Surfactants Test	\$	18	\$
5. Caffeine Test	\$	18	\$
6. 1,7 – DMX Test	\$	18	\$
7. Acetaminophen Test	\$	18	\$
8. Carbamazepine Test	\$	18	\$
9. Primidone Test	\$	18	\$
10. Atenolol Test	\$	18	\$
11. Cotinine Test	\$	18	\$
12. Urobilin Test	\$	18	\$
13. Azithromycin Test	\$	18	\$
		<b>Grand Total</b>	<b>\$ _____</b>

The proposal shall include all costs associated with the work including, inter alia, labor, transportation, documentation, final report, equipment, consumables, shipping, overhead and profit.

## **Attachment 1**

**Excerpt from MS4 Permit indicating testing requirements**

permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper operation and maintenance requires the operation of backup or auxiliary facilities or similar systems, installed by a permittee when necessary to achieve compliance with this permit.

**(d) Signature Requirements**

The Plan shall be signed by the chief elected official or principal executive officer, as those terms are defined in Section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies. The Plan shall be retained by the chief elected official or principal executive officer and copies retained by town officials or employees responsible for implementation of the Plan.

**(e) Plan Review Fee**

When submitting a Stormwater Management Plan as requested by the Commissioner in accordance with Section 4(f)(2)(A) each municipal permittee shall submit a plan review fee of \$187.50.

**(f) Keeping Plans Current.**

The permittee shall amend the Plan whenever; (1) there is a change which has the potential to cause pollution of the waters of the state; or (2) the actions required by the Plan fail to ensure or adequately protect against pollution of the waters of the state; or (3) the Commissioner requests modification of the Plan. The amended Plan shall be completed and all actions required by such Plan shall be completed within a time period determined by the Commissioner.

The Commissioner may notify the permittee in writing at any time that the Plan does not meet one or more of the requirements of this general permit. Within 30 days of such notification, unless otherwise specified by the Commissioner in writing, the permittee shall respond to the Commissioner indicating how they plan to modify the Plan to address these requirements. Within 90 days of this response or within 120 days of the original notification, whichever is less, unless otherwise specified by the Commissioner in writing, the permittee shall then revise the Plan, perform all actions required by the revised Plan, and shall certify to the Commissioner that the requested changes have been made and implemented. The permittee shall provide such information as the Commissioner requires to evaluate the Plan and its implementation.

**(g) Failure to Prepare or Amend Plan**

In no event shall failure to complete or update a Plan in accordance with Sections 5(b) and 6 of this general permit relieve a permittee of responsibility to implement actions required to protect the waters of the state and to comply with all conditions of this general permit.

**(h) Monitoring Requirements**

**(1) Schedule of Monitoring**

(A) Stormwater monitoring shall be conducted by the Regulated Small MS4 annually starting in 2004. At least two outfalls apiece shall be monitored from areas of primarily industrial development, commercial development and residential development, respectively, for a total of six (6) outfalls monitored. Each monitored outfall shall be

selected based on an evaluation by the MS4 that the drainage area of such outfall is representative of the overall nature of its respective land use type.

(B) The municipality may submit a request to the Commissioner in writing for implementation of an alternate sampling plan of equivalent or greater scope. The Commissioner will approve or deny such a request in writing.

(2) Parameters to be monitored

The parameters to be monitored for each discharge point shall include:

pH (SU)  
Hardness (mg/l)  
Conductivity (umhos)  
Oil and grease (mg/l)  
Chemical Oxygen Demand (mg/l)  
Turbidity (NTU)  
Total Suspended Solids (mg/l)  
Total Phosphorous (mg/l)  
Ammonia (mg/l)  
Total Kjeldahl Nitrogen (mg/l)  
Nitrate plus Nitrite Nitrogen (mg/l)  
E. coli (col/100ml)

In addition to this list of parameters, uncontaminated rainfall pH shall be measured at the time the runoff sample is taken.

(3) Stormwater Monitoring Procedures

(A) Samples shall be collected from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours after any previous storm event of 0.1 inch or greater. Runoff events resulting from snow or ice melt cannot be used to meet the minimum annual monitoring requirements. Grab samples shall be used for all monitoring. Grab samples shall be collected during the first 6 hours of a storm event discharge. The uncontaminated rainfall pH measurement shall also be taken at this time. Samples for all discharges shall be taken during the same storm event.

(B) Storm Event Information

The following information shall be collected for the storm events monitored:

- (i) The date, temperature, time of the start of the discharge, time of sampling, and magnitude (in inches) of the storm event sampled.
- (ii) The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event.

(C) Test Procedures

Unless otherwise specified in this permit, all pollutant parameters shall be tested according to methods prescribed in Title 40, CFR, Part 136 (1990).

**Attachment 2**

**EPA New England Bacterial Source Tracking Protocol**

**indicating testing requirements for PPCP tests**



**EPA New England Bacterial Source Tracking Protocol**  
Draft – January 2012

**Purpose**

This document provides a common framework for EPA New England (“EPA-NE”) staff to develop and implement bacterial source tracking sample events, and provides a recommended approach to watershed association, municipal, and State personnel. Adopted from Boston Water and Sewer Commission (“BWSC”) (2004), Pitt (2004), and based upon fieldwork conducted and data collected by EPA-NE, the protocol relies primarily on visual observations and the use of field test kits and portable instrumentation during dry and wet weather to complete a screening-level investigation of stormwater outfall discharges or flows within the drainage system. When necessary, the addition of more conclusive chemical markers may be included. The protocol is applicable to most typical Municipal Separate Storm Sewer Systems (“MS4s”) and smaller tributary streams. The smaller the upstream catchment area and/or more concentrated the flow, the greater the likelihood of identifying an upstream wastewater source.

**Introduction**

The protocol is structured into several phases of work that progress through investigation planning and design, laboratory coordination, sample collection, and data evaluation. The protocol involves the concurrent collection and analyses of water samples for surfactants, ammonia, total chlorine, and bacteria. When more precise confirmation regarding the presence or absence of human sanitary sewage is necessary, and laboratory capacity is available, the additional concurrent collection of samples for select Pharmaceutical and Personal Care Product (“PPCP”) analysis is advised. When presented with a medium to large watershed or numerous stormwater outfalls, the recommended protocol is the screening of all outfalls using the surfactant, ammonia, total chlorine, and bacterial analyses, in addition to a thorough visual assessment. The resulting data and information should then be used to prioritize and sample a subset of outfalls for all parameters, including PPCP compounds and additional analyses as appropriate. Ideally, screening-level analyses can be conducted by state, municipal, or local watershed association personnel, and a prioritized sub-set of outfalls can be sampled through a commercial laboratory or by EPA-NE using more advanced confirmatory techniques.

**Step I – Reconnaissance and Investigation Design**

Each sample event should be designed to answer a specific problem statement and work to identify the source of contamination. Any relevant data or reports from State, municipal, or local watershed associations should be reviewed when selecting sample locations. Aerial photography, mapping services, or satellite imagery resources are available free to the public through the internet, and offer an ideal way to pre-select locations for either field verification or sampling.

Sample locations should be selected to segregate outfall sub-catchment areas or surface waters into meaningful sections. A common investigative approach would be the identification of a

specific reach of a surface water body that is known to be impaired for bacteria. Within this specific reach, stormwater outfalls and smaller tributary streams would be identified by desktop reconnaissance, municipal outfall mapping, and field investigation when necessary. Priority outfalls or areas to field verify the presence of outfalls should be selected based on a number of factors, including but not limited to the following: those areas with direct discharges to critical or impaired waters (e.g. water supplies, swimming beaches); areas served by common/twin-invert manholes or underdrains; areas with inadequate levels of sanitary sewer service, Sanitary Sewer Overflows (“SSOs”) or the subject of numerous/chronic sanitary sewer customer complaints; formerly combined sewer areas that have been separated; culverted streams, and; outfalls in densely populated areas with older infrastructure. Pitt (2004) provides additional detailed guidance.

When investigating an area for the first time, the examination of outfalls in dry-weather is recommended to identify those with dry-weather flow, odor, and the presence of white or gray filamentous bacterial growth that is common (but not exclusively present) in outfalls contaminated with sanitary. For those outfalls with dry-weather flow and no obvious signs of contamination, one should never assume the discharge is uncontaminated. Sampling by EPA-NE staff has identified a number of outfalls with clear, odorless discharges that upon sampling and analyses were quite contaminated. Local physical and chemical conditions, in addition to the numerous causes of illicit discharges, create outfall discharges that can be quite variable in appearance. Outfalls with no dry-weather flow should be documented, and examined for staining or the presence of any obvious signs of past wastewater discharges downstream of the outfall.

As discussed in BWSC (2004), the protocol may be used to sample discreet portions of an MS4 sub-catchment area by collecting samples from selected junction manholes within the stormwater system. This protocol expands on the BWSC process and recommends the concurrent collection of bacteria, surfactant, ammonia, and chlorine samples at each location to better identify and prioritize contributing sources of illicit discharges, and the collection of PPCP compounds when more conclusive source identification is necessary.

Finally, as discussed further in Step IV, application of this sampling protocol in wet-weather is recommended for most outfalls, as wet-weather sampling data may indicate a number of illicit discharge situations that may not be identified in dry weather.

## **Step II – Laboratory Coordination**

All sampling should be conducted in accordance with a Quality Assurance Project Plan (“QAPP”). A model QAPP is included as Attachment 1. While the QAPP details sample collection, preservation, and quality control requirements, detailed coordination with the appropriate laboratory staff will be necessary. Often sample events will need to be scheduled well in advance. In addition, the sampling team must be aware of the strict holding time requirements for bacterial samples – typically samples analysis must begin within 6 hours of sample collection. For sample analyses conducted by a commercial laboratory, appropriate coordination must occur to determine each facilities respective procedures and requirements.

The recommendations in this protocol are based on the use of a currently unpublished EPA-NE modification to *EPA Method 1694 – Pharmaceuticals and Personal Care Products in Water, Soil, Sediment, and Biosolids by HPLC/MS/MS*. Several commercial laboratories may offer Method 1694 capability. EPA-NE recommends those entities wishing to utilize a contract laboratory for PPCP analyses ensure that the laboratory will provide quantitative analyses for acetaminophen, caffeine, cotinine, carbamazepine, and 1,7-dimethylexanthine, at Reporting Limits similar to those used by EPA-NE (See Attachment 2). Currently, the EPA-NE laboratory has limited capacity for PPCP sampling, and any proposed EPA-NE PPCP sample events must be coordinated well in advance with the appropriate staff.

### **Step III – Sample Collection**

Once a targeted set of outfalls has been selected, concurrent sampling and analyses for surfactants, ammonia, and total chlorine (which can all be done through the use of field kits), in addition to bacteria (via laboratory analysis) should be conducted. When numerous outfalls with dry-weather flow exist, sample locations should be prioritized according to the criteria mentioned above. In addition, field screening using only the field kits may occur during the field reconnaissance. However, it must be emphasized that the concurrent sampling and analyses of bacteria, surfactant, ammonia, and total chlorine parameters is the most efficient and cost-effective screening method.

When first observed, the physical attributes of each outfall or sampling location should be noted for construction materials, size, flow volume, odor, and all other characteristics listed on the data collection form (Attachment 3). In addition, GPS coordinates should be collected and a photograph of the sample location taken. Whenever possible, the sampling of storm drain outfalls should be conducted as close to the outfall opening as possible. Bacterial samples should be collected first, with care to not disturb sediment materials or collect surface debris/scum as best possible. A separate bottle is used to collect a single water sample from which aliquots will be analyzed for surfactants, ammonia, and total chlorine. A sample for PPCP analysis is recommended to be collected last, as the larger volume required and larger bottle size may cause some sediment disturbance in smaller outfalls or streams. If necessary, a second smaller, sterile and pre-cleaned sampling bottle may be used to collect the surface water which can then be poured into the larger PPCP bottle. Last, a properly calibrated temperature/specific conductance/salinity meter should be used to record all three parameters directly from the stream or outfall. When flow volume or depth is insufficient to immerse the meter probe, a clean sample bottle may be utilized to collect a sufficient volume of water to immerse the probe. In such instances, meter readings should be taken immediately.

As soon as reasonably possible, sample aliquots from the field kit bottle should be analyzed. When concurrent analyses are not possible, ammonia and chlorine samples should be processed first, followed by surfactant analysis, according to each respective Standard Operating Procedure as appropriate based on the particular brand and type of field test kit being used. All waste from the field test kits should be retained and disposed of according to manufacture instructions. Where waste disposal issues would otherwise limit the use of field kits, EPA-NE recommends

that, at a minimum, ammonia test strips with a Reporting Limit below 0.5 mg/L be utilized. Such test strips typically are inexpensive and have no liquid reagents associated with their use. Results should be recorded, samples placed in a cooler on ice, and staff should proceed to the next sample location.

Upon completion of sampling and return to the laboratory, all samples will be turned over to the appropriate sample custodian(s) and accompanied by an appropriate Chain-of-Custody ("COC") form.

#### Step IV – Data Evaluation

Bacterial results should be compared to the applicable water quality standards. Surfactant and ammonia concentrations should be compared to the thresholds listed in Table 1. Evaluation of the data should include a review for potential positive results due to sources other than human wastewater, and for false negative results due to chemical action or interferences. In the EPA-NE region, field sampling has indicated that the biological breakdown of organic material in historically filled tidal wetlands may cause elevated ammonia readings, as can the discharge from many landfills. In addition, salinity levels greater than 1 part per thousand may cause elevated surfactant readings, the presence of oil may likewise indicate elevated levels, and fine suspended particulate matter may cause inconclusive surfactant readings (for example, the indicator ampule may turn green instead of a shade of blue). Finally, elevated chlorine from leaking drinking water infrastructure or contained in the illicit wastewater discharge may inhibit bacterial growth and cause very low bacterial concentrations. Any detection of total chlorine above the instrument Reporting Limit should be noted.

**Table 1 – Freshwater Water Quality Criteria, Threshold Levels, and Example Instrumentation <sup>1</sup>**

Analyte/ Indicator	Threshold Levels/ Single Sample <sup>3</sup>	Instrumentation
E. coli <sup>2</sup>	235 cfu/100ml	Laboratory via approved method
Enterococci <sup>2</sup>	61 cfu/100ml	Laboratory via approved method
Surfactants (as MBAS)	≥ 0.25 mg/l	MBAS Test Kit (e.g. CHEMetrics K-9400)
Ammonia (NH <sub>3</sub> )	≥ 0.5 mg/l	Ammonia Test Strips (e.g. Hach brand)
Chlorine	> Reporting Limit	Field Meter (e.g. Hach Pocket Colorimeter II)
Temperature	See Respective State Regulations	Temperature/Conductivity/Salinity Meter (e.g. YSI Model 30)

<sup>1</sup> The mention of trade names or commercial products does not constitute endorsement or recommendation for use by the U.S. EPA

<sup>2</sup> 314 CMR 4.00 MA - Surface Water Quality Standards - Class B Waters.

<sup>3</sup> Levels that may be indicative of potential wastewater or washwater contamination

Once dry-weather data has been examined and compared to the appropriate threshold values, outfalls or more discreet reaches of surface water can be selected for sampling or further investigation. Wet-weather sampling is also recommended for all outfalls, in particular for those that did not have flow in dry weather or those with dry-weather flow that passed screening thresholds. Wet-weather sampling will identify a number of situations that would otherwise pass unnoticed in dry weather. These wet-weather situations include, but are not limited to the following: elevated groundwater that can now cause an exchange of wastewater between cracked or broken sanitary sewers, failed septic systems, underdrains, and storm drains; increased sewer volume that can exfiltrate through cracks in the sanitary piping; increased sewer volume that can enter the storm drain system in common manholes or directly-piped connections to storm drains; areas subject to capacity-related SSO discharges, and; illicit connections that are not carried through the storm drain system in dry-weather.

### Step V – Costs

Use of field test kits and field instruments for a majority of the analytical parameters allows for a significantly reduced analytical cost. Estimated instrument costs and pro-rated costs per 100 samples are included in Table 2. The cost per 100 samples metric allows averaged costs to account for reagent refills that are typically less expensive as they do not include the instrument cost, and to average out the initial capital cost for an instrument such as a temperature/conductivity/salinity meter. For such capital costs as the meters, the cost over time will continue to decrease.

**Table 2 – Estimated Field Screening Analytical Costs <sup>1</sup>**

Analyte/ Indicator	Instrument or Meter <sup>2</sup>	Instrument or Meter Cost/No. of Samples	Cost per Sample (Based on 100 Samples) <sup>3</sup>
Surfactants (as MBAS)	Chemetrics K-9400	\$77.35/20 samples (\$58.08/20 sample refill)	\$3.09
Ammonia (NH <sub>3</sub> )	Hach brand 0 – 6 mg/l	\$18.59/25 samples	\$0.74
Total Chlorine	Hach Pocket Colorimeter II	\$389/100 samples (\$21.89 per 100 sample refill)	\$3.89
Temperature/ Conductivity/ Salinity	YSI	\$490 (meter and cable probe)	\$4.90

<sup>1</sup> Estimated costs as of February 2011

<sup>2</sup> The mention of trade names or commercial products does not constitute endorsement or recommendation for use by the U.S. EPA

<sup>3</sup> One-time meter costs and/or refill kits will reduce sample costs over time

From Table 2, the field analytical cost is approximately \$13 per outfall. Typical bacterial analyses costs can vary depending on the analyte, method, and total number of samples to be

performed by the laboratory. These bacterial analyses costs can range from \$20 to \$60. Therefore, the analytical cost for a single outfall, based on the cost per 100 samples, ranges from \$33 to \$73. As indicated above, these costs will decrease slightly over time due to one-time capitals costs for the chlorine and temperature/conductivity/salinity meters.

#### **Step VI – Follow-Up**

Once all laboratory data has been reviewed and determined final in accordance with appropriate quality assurance controls, results should be reviewed with appropriate stakeholders to determine next steps. Those outfalls or surface water segments that fail to meet the appropriate water quality standard, and meet or exceed the surfactant and ammonia threshold values, in the absence of potential interferences mentioned in Step IV, indicate a high likelihood for the presence of illicit connections upstream in the drainage system or surface water. Whereas illicit discharges are quite variable in nature, the exceedance of the applicable water quality standard and only the ammonia or surfactant threshold value may well indicate the presence of an illicit connection. When available, the concurrent collection and analyses of PPCP data can greatly assist in confirming the presence of human wastewater. However, such data will not be available in all instances, and the collective data set and information regarding the physical characteristics of each sub-catchment or surface water reach should be used to prioritize outfalls for further investigation. As warranted, data may be released to the appropriate stakeholders, and should be accompanied by an explanation of preliminary findings. Release of EPA data should be fully discussed with the case team or other appropriate EPA staff.

#### **References Cited**

Boston Water & Sewer Commission, 2004, *A systematic Methodology for the Identification and Remediation of Illegal Connections*. 2003 Stormwater Management Report, chap. 2.1.

Pitt, R. 2004 *Methods for Detection of Inappropriate Discharge to Storm Drain Systems. Internal Project Files*. Tuscaloosa, AL, in The Center for Watershed Protection and Pitt, R., *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*: Cooperative Agreement X82907801-0, U.S. Environmental Protection Agency, variously paged. Available at: <http://www.cwp.org>.

#### **Instrumentation Cited (Manufacturer URLs)**

MBAS Test Kit - CHEMetrics K-9400: <http://www.chemetrics.com/Products/Deterg.htm>

Portable Colorimeter – Hach Pocket Colorimeter II: <http://www.hach.com/>

Ammonia (Nitrogen) Test Strips: <http://www.hach.com/>

Portable Temperature/Conductivity/Salinity Meter: YSI Model 30:  
<http://www.ysi.com/productsdetail.php?30-28>

**Disclaimer: The mention of trade names or commercial products in this protocol does not constitute endorsement or recommendation for use by the U.S. EPA.**

**Attachment 1**

Stormwater Monitoring Program QAPP  
5/17/12  
Revision 1  
Page 1 of 7

**Stormwater Monitoring Quality Assurance Project Plan  
2012-2017**

RFA #

**Sampling Plan Acceptance**

EPA OES Enforcement and Project Manager/Coordinator <b>Signature:</b>	<b>Date:</b>
EPA OEME Project Managers/Coordinator <b>Signature:</b>	<b>Date:</b>
EPA OEME QA Officer <b>Signature:</b>	<b>Date:</b>
EPA Chemistry Team Lead <b>Signature:</b>	<b>Date:</b>

## **Attachment 1**

Stormwater Monitoring Program QAPP  
5/17/12  
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### **1.0 Background**

U.S. EPA Administrative Order 5360.1 requires that "all projects involving environmental monitoring performed by or for the U.S. EPA shall not be undertaken without an adequate Quality Assurance Project Plan (QAPP)." The purpose of this document is to describe the process used to develop, select, manage, and finalize stormwater monitoring projects. In describing this process, quality assurance goals and methods will be established, thus ensuring that the overall program and each monitoring project will meet or exceed EPA requirements for quality assurance.

The objective of these projects will be to collect data that is usable by EPA OES enforcement staff for enforcement actions and information requests. The primary focus of this project will be on urban water stormwater outfalls in the New England Region watersheds.

### **2.0 Sampling overview**

Monitoring will be conducted on pre-scheduled days with the Laboratory. Samples will be retrieved from surface water, in stream or outfalls at suspected hotspots or areas that need further delineation. Sample sites will be located using GPS, with an accuracy goal of  $\pm 1$  meter and PDOP less than 6. Less accurate GPS reading or coordinates from maps will be accepted when site or other conditions do not allow  $\pm 1$  meter accuracy.

The primary focus of this sampling will be used to identify illegal discharges. Results from the sampling will be used by EPA enforcement staff for enforcement purposes. For this project, sampling will be conducted according to EPA's Ambient Water Sampling SOP (Table 3). Volunteers and watershed association staff may assist in sampling. All procedures will be followed that are specified in Table 3. Parameter to be sampled will be predetermined by enforcement (OES) and OEME staff, based on data needs.

#### **A. Locations**

Site locations will be determined from field or desktop reconnaissance by project staff. Sample analyses will be predetermined based on conditions known about the sampling location prior to sampling. These may include data from previous sampling or from data collected from Mass DEP or local watershed associations. Any of the parameters listed in table 2 may be analyzed.

#### **B. Analytical Methods and Reporting limits**

Sample analyses will be conducted by EPA Laboratories.

This effort will test and compare the most appropriate analytical methods including, but not limited to; laboratory analysis, test kits and field analysis to determine the most effective and cost-efficient outfall and in-stream sampling approach.

Multiple and repeated testing will occur at each location to compare different method for identifying sewage contamination.

PPCPs, E.coli and enterococcus will be analyzed by EPA's Laboratory. Surfactants, ammonia, total chlorine will be analyzed with field test kits. Potential additional laboratory analyses include nitrogen (nitrate/nitrite), TSS, BOD, surfactants, ammonia and TPH. The Laboratory used



**Attachment 1**

Stormwater Monitoring Program QAPP  
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for each sampling event will be determined prior to sampling by the OEME Project Manager based on required analyses Laboratory availability and contract funds available.

Where available, a known concentration sample will be used to evaluate the performance of each test method. The known concentration sample will be processed in the field and Laboratory as a routine sample. The analyst or field technician will not know the concentration of the sample prior to analyzing and reporting the sample result. Sampling for PPCP testing will be done using extreme care not to contaminate the sample. No caffeine products should be consumed prior to sampling.

**Table 1: Parameter specifications**

Parameter (lab - equipment)	Preservation	Holding time
PH	None	Immediate
Temperature	None	Immediate
Sp Cond	None	Immediate
DO	None	Immediate
Total Phosphorus (EPA)	H <sub>2</sub> SO <sub>4</sub> (pH <2) + Ice	28 days
TSS (EPA)	Ice	7 days
TSS (Alpha)	Ice	7 days
BOD (Alpha)	Ice	48 hours
Surfactants (Alpha)	Ice	48 hours
Surfactants (field kit - Chemetrics)	None	Immediate
Ammonia (alpha)	H <sub>2</sub> SO <sub>4</sub> (pH <2) + Ice	28 days
Ammonia (test strips)	None	Immediate
TPH Petroleum ID (alpha)	Ice	7 Days to extraction 40 days after extraction
E. Coli (EPA)	Ice	6 hrs to lab
Enterococcus (EPA)	Ice	6 hrs to lab
PPCP	Ice (acidified in Lab)	7 day to extraction 40 days after extraction
Chlorine (Field kit - Hach)	None	Immediate

**Attachment 1**

Stormwater Monitoring Program QAPP  
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**Table 2: Analytical References and Quality Control Goals**

Parameter (lab- equipment)	Reporting Limits	Water Quality Criteria or Guidelines	Quality Assurance Goals		
		(MA or EPA)	Precision	Accuracy	Completeness
PH	4 to 10 units	6.5 - 8.3	0.02 unit	± 0.3 units	90%
Temperature	0 to +40°C	28.3°C	0.1 °C	± 0.15°C	90%
Sp Cond	0 to 100 mS/cm	NA	5 uS/cm	±10% cal std (µS/cm)	90%
DO	0.5mg/l to Sat	≥5 mg/l, ≥60% saturation	0.02mg/l	± .5 mg/l	90%
Total Phosphorus (EPA)	5.0 ug/l	NA	Field dup 30% RPD	MS 70-130%	90%
TSS (EPA)	5mg/L	NA	Field dup 30% RPD	See SOP	
TSS (Alpha)	5 mg/L	NA	Field dup 30% RPD	See SOP	90%
BOD (Alpha)	2 mg/L	NA	Field dup 30% RPD	See SOP	90%
Surfactants (field kit - Chemetrics)	0.25 mg/L <sup>1</sup>	0.25 mg/L	Field dup 30% RPD	TBD	90%
Ammonia (test strips)	0.25 mg/L <sup>1</sup>	1.0 mg/L	Field dup 30% RPD	TBD	90%
TPH Petroleum ID (alpha)	Variable	NA	Field dup 30% RPD	See SOP	
E. Coli (EPA)	4 col./ 100 ml	≤126 col./100 ml* ≤ 235 col./100 ml	±100 col/100ml or 30% RPD	N/A	90%
Enterococcus (EPA)	1 col/100ml	≤33 col./100 ml* ≤ 61 col./100 ml	±100 col/100ml or 30% RPD	See SOP	90%
PPCP	TBD	NA	Field dup 50% RPD	TBD	90%
Chlorine (Field kit - Hach)	0.02 mg/l	NA	Field dup 30% RPD	TBD	90%

Note

\*Geometric mean Criteria

TBD = To be determined, Field methods and some colorimeter methods do not have accuracy criteria determined.

<sup>1</sup> Needs field verification to confirm

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**Table 3: Field and Laboratory References**

Parameter	Analytical Method Reference	SOP reference
<b>Field References- 5/2005</b>		
pH		
Conductivity		
Temperature		
dissolved oxygen	n/a	ECASOP-YSISondes9
Ambient water samples	n/a	ECASop-Ambient Water Sampling2
Chain of custody of samples	n/a	EIASOP-CHAINOFCUST
Sample login, tracking, disposition	n/a	EIASOP-ADMLOG14
<b>Lab References- 5/2005</b>		
Total Phosphorus (EPA)	EPA 365.3	EIASOP-INGTP8
TSS (EPA)	EPA 160.2	EIASOP-INGTSS-TDS-VRESS
TSS (Alpha)	EPA 160.2,SM2540D	SOP/07-29
BOD (Alpha)	EPA 405.1,SM5210B	SOP/07-13
Surfactants (field kit – Chemetrics)	Chemetrics	Draft
Ammonia (test strips)	Hach	Draft
TPH Petroleum ID (alpha)	8015B (M)	0-017
E. Coli (EPA)	SM9230	ECASOP- TC/EC Colilert2
Enterococcus (EPA)	SM9230	ECASOP-Enterolert1
PPCP	EPA 1694	TBD
Chlorine (Field kit – Hach)	Hach	TBD

\*Specific conductance is the only parameter identified as non critical

Bottle list

**Table 4: Bottle Sampling List**

Parameter (lab - equipment)	Bottle	Preservation
<b>Primary analyses</b>		
E. Coli (EPA)	(2) 120ml or 250ml sterile	Ice
Enterococcus (EPA)		Ice
PPCP	1 Liter Amber	Ice (acidified in Lab)
<b>Optional analyses</b>		
Chlorine (Alpha)	500 ml	Ice
Total Phosphorus (EPA)	125 ml	H <sub>2</sub> SO <sub>4</sub> (pH <2) + Ice
TSS (EPA)	1 liter	Ice
TSS (Alpha)	1 liter	Ice
BOD (Alpha)	1 Liter	Ice
TPH Petroleum ID (alpha)	2 -1 Liter Amber Glass tephlon lined	Ice
E. Coli (Alpha)	120 ml sterile	Ice
Enterococcus (Alpha)	120 ml sterile	Ice

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### **C. Quality Control**

- Calibration:** EPA will calibrate its sondes according to the EPA sonde calibration SOP.
- Field duplicate:** One duplicate sample will be collected per sampling event or approximately for every ten samples.
- Trip Blank:** OEME Chemist will run appropriate QA samples for PPCP's. One blank sample will be collected for approximately every ten bacteria samples. Reported data that is less than 5 times the trip (field) blank concentration will be flagged.
- QC Criteria:** Are specified in table 2, data not meeting this criteria will be reviewed by the Project Manager. Data that does not meet laboratory QA/QC criteria will be flagged by the laboratory.

### **D. Chain of Custody**

Chain of custody procedures will follow the OEME/Investigations Office SOP (Table 3)

### **3.0 Data Review**

EPA Microbiology data will be reviewed by the Biology QAO. Alpha generated microbiology samples will be reviewed by the OEME Project Manager. All field data and draft data reports will be reviewed by the OEME Project manager. Laboratory generated data (from Alpha and EPA) will be reviewed by the Chemistry Team Leader.

### **4.0 Data reports**

Data reports will be reviewed by the Project Coordinator and the OEME Project Manager before a final report is release to the Enforcement Coordinator. Draft reports may be released without a complete review.

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### 5.0 Attachments

- 1) Standard Operating Procedure Enterococcus (SM9230B), Multiple Tube Technique. SOP/07-01 *Alpha Analytical, Inc. May 28, 2005*
- 2) Standard Operating Procedure E. Coli (SM9213D). SOP/07-41 *Alpha Analytical, Inc. May 28, 2005*
- 3) Standard Operating Procedure MBAS, Ionic Surfactants. Draft SOP *EPA Laboratory. January 28, 2010*
- 4) Standard Operating Procedure Nitrogen Ammonia. Draft SOP *EPA Laboratory. February 10, 2011*
- 5) Standard Operating Procedure Total Chlorine. Draft SOP *EPA Laboratory. February 12, 2010*
- 6) Standard Operating Procedure TSS/ TVSS (SM2540 D, EPA 160.2). SOP/07-29 *Alpha Analytical, Inc. September 29, 2007*
- 7) Standard Operating Procedure BOD-5day, SBOD-5day, and cBOD-5day (SM 5210B, and EPA 405.1). SOP/07-13 *Alpha Analytical, Inc. September 29, 2007*
- 8) Standard Operating Procedure TPH 8015D – Modified 0-017 (EPA 8015D Modified) *Alpha Analytical, Inc. March 04, 2008*
- 9) Standard Operating Procedure determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma- Mass Spectrometry (200.8). SOP/06-11 *Alpha Analytical, Inc. July 13, 200*
- 10) Standard Operating Procedure Inductively Coupled Plasma – Mass Spectrometry (6020). SOP/06-10 *Alpha Analytical, Inc. October 25, 2007*

## Target Compounds, Uses, and Reporting Limits

Target Compound	Major Use	RL (ng/L)	Daily Dose (ng)
Caffeine	Natural Stimulant	5.0	200,000,000
1,7-DMX	Metabolite of caffeine	2.5	N/A
Acetaminophen	Pain Reliever	2.5	650,000,000
Carbamazepine	Anti-depressant / bi-polar Anti-convulsant (epilepsy)	0.5	100,000,000
Primidone	Anti-epilepsy drug (AED)	5.0	100,000,000
Atenolol	Beta Blocker High Blood Pressure	2.5	50,000,000
Cotinine	Metabolite of Nicotine	0.5	3,500-7,200 (ng/mL)
Urobilin	By-product of hemoglobin breakdown (mammals)	5.0	1,300,000 ng/g in feces
Azithromycin	Antibiotic	1.6	200,000,000

## STORMWATER MONITORING

### **Field Collection Requirements** (To be recorded at each site)

#### **Sample-**

Site Name \_\_\_\_\_

Time collected \_\_\_\_\_

Date collected \_\_\_\_\_

#### **Inspection-**

**\*\*Take picture at site\*\***

Outfall diameter \_\_\_\_\_ (na' if open stream)

Flow estimate \_\_\_\_\_ (na' if open stream)

Odor \_\_\_\_\_

Color \_\_\_\_\_

Turbidity \_\_\_\_\_

Floatables \_\_\_\_\_

Other observations \_\_\_\_\_

\_\_\_\_\_

#### **YSI Meter (calibrate in lab)-**

Salinity \_\_\_\_\_

Temp \_\_\_\_\_

Conductivity (give both #'s)

\_\_\_\_\_

#### **Location information-**

Short description of where sample was collected at site \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

GPS \_\_\_\_\_

\_\_\_\_\_

**Field Kits** listed in the order they should be conducted in, include any applicable notes-

NH3 strip \_\_\_\_\_

CI2 kit \_\_\_\_\_

Hach meter - (3 min wait)

Surfactant \_\_\_\_\_

Chemetrics K-9400 Blue box/detergent test kit

#### **Additional Notes:**

(Note any changes in weather conditions) \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## **STORMWATER MONITORING (PAGE 2)**

### **Field Equipment List**

#### **Waste Containers (2 total – clearly labeled):**

1 liter amber plastic for surfactants/detergents kit waste

1 liter amber plastic for Cl2 kit waste

#### **Sample Bottles (3 total for each sample location)-**

120ml sterile – E.coli/entero

1 Liter amber glass: PPCP, EPA (Peter Philbrook)

120ml-250ml plastic – Field Kit Bottle – to be used on site for kits listed above

\*\*\*Fill out chain of custody

#### **In Carboy Container**

- Log book
- COC forms
- Extra sample bottles
- Colored tape
- Sharpies
- Write-On-Rain Pens
- Paper towels
- GPS
- Sampling plan & GPS locations
- Regular length Powder Free Gloves
- Squirt bottle of DI Water
- Coolers with Ice
- Waders/Boots
- YSI multi parameter Meter