

**Lower Allen Township
MS4 Program**

**Annual Update
And
Public Meeting**

April 8, 2019

MS4 NPDES Program

□ What is MS4?

- Municipal
- Separate
- Storm
- Sewer
- System



Background



A PROGRAM UNDER WHICH A MUNICIPALITY IS ISSUED A PERMIT TO DISCHARGE STORMWATER INTO THE CHESAPEAKE BAY

THE INTENT OF THE MS4 PROGRAM IS TO REDUCE POLLUTANTS INTO WATERS OF THE COMMONWEALTH

THE MS4 PROGRAM IS REGULATED BY BOTH THE UNITED STATES DEPARTMENT OF ENVIRONMENTAL PROTECTION AGENCY (EPA) AND THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION (PADEP)

Storm Water Permit Program for Small Communities

- Federal regulation requires permit for our community**
 - National Pollutant Discharge Elimination System (NPDES)**
- PA DEP created state permitting program to meet federal regulation**

HOW DOES THE MS4 PERMIT WORK?

MUNICIPALITIES ACQUIRE A NPDES PERMIT THAT COVERS A 5 YEAR PERIOD.

THE PERMIT REQUIRES THE MUNICIPALITY TO MEASURE IT'S EFFORTS TO REDUCE POLLUTANTS IN 6 DIFFERENT AREAS.

ANNUALLY, THE MUNICIPALITY MUST REPORT TO PADEP ON HOW THEY HAVE IMPROVED, CHANGED, AND MANAGED THESE AREAS IN ORDER TO MAINTAIN COMPLIANCE WITH THEIR PERMIT.

MINIMUM CONTROL MEASURES MUST BE RE-EVALUATED ANNUALLY TO DETERMINE COMPLIANCE.

Minimum Control Measures of the permit (MCMs)

- **Public Education and Outreach**
- **Public Involvement and Participation**
- **Illicit Discharge Detection and Elimination**
- **Construction Site Stormwater Runoff Control**
- **Post Construction Stormwater Management**
- **Pollution Prevention/Good Housekeeping**

GENERAL MS4 PERMIT INFORMATION

2018 PAG-13 NPDES General MS4 Permit No. PAG 133711

Effective Date: March 16, 2018

Expiration Date: March 15, 2023

**First reporting period ended on
June 30, 2018**

**First Annual Report was due September
30, 2018 (April 1, 2017- June 30, 2018)**

**All subsequent Annual Reports due
September 30 and will cover the reporting
period of July 1 – June 30**

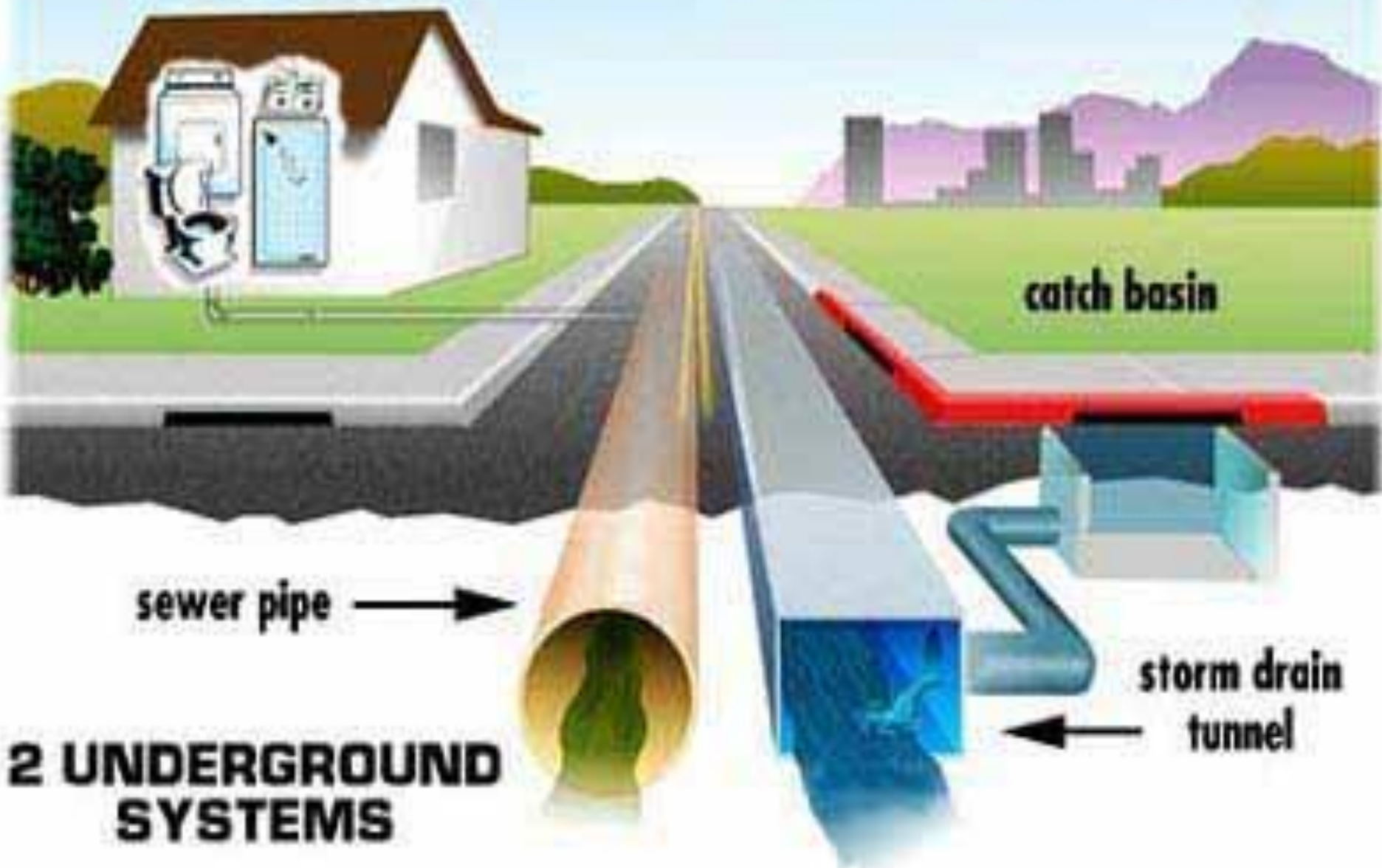
***A \$500 fee is now required to be submitted
with EACH annual report to PADEP**



Storm Water Pollutants

- ☐ **Sediment**
- ☐ **Nutrients**
- ☐ **Bacteria**
- ☐ **Oxygen Demand**
- ☐ **Oil and Grease**
- ☐ **Trace Metals**
- ☐ **Toxic Chemicals**
- ☐ **Chlorides**
- ☐ **Thermal Impacts**

household wastewater
(toilet, sinks, etc.)



LAT Storm Water Program Minimum Control Measures (MCMs)

- Public Education and Outreach**
- Construction Site Runoff Control**
- Public Involvement/Participation**
- Post-Construction Storm Water Management**
- Illicit Discharge Detection and Elimination**
- Pollution Prevention/Good Housekeeping**

LAT Stormwater Program- Additional Requirements

**Pollution Reduction Plan
(PRP)**

**Pollution Control Measures
(PCMs) – Added to the
permit in Appendices**



Requirements & Changes to the 2018 PAG-13 NPDES General Permit



MCM #1 - Public Education and Outreach

- ❑ Develop and Distribute educational materials with general stormwater information - at least one publication required annually (newsletter, website)**
- ❑ Distribute educational materials to target audiences using a variety of distribution methods – at least two distribution methods annually in addition to the requirement above (meetings, presentations, bill stuffers, posters, pamphlets, brochures)**
- ❑ Maintain and update outreach plan for community**
- ❑ Educate public on water quality impacts due to stormwater runoff and steps for reduction of pollutants**

MCM #2 - Public Involvement/Participation

- ❑ **Make Annual MS4 Reports and all other plans, programs, maps, and reports required by the permit available to the public on the website, at the office or by mail request**
- ❑ **Create opportunities for the public to participate in the program.**
- ❑ **Advertise and solicit public input on the following documents prior to submission to PADEP**
 - **Stormwater Management Ordinance**
 - **Pollution Reduction Plan**
- ❑ **Hold a public meeting on the program by March 15, 2023 to solicit public involvement and participation.**
- ❑ **Support volunteer programs**
 - **Water Quality Monitoring**
 - **Storm Drain Identification**
 - **Stream Clean-Ups**

MCM #3 - Illicit Discharge Detection and Elimination

- * Enact DEP's model ordinance or update our existing ordinance that includes prohibition of non-stormwater discharges to the MS4. This must be completed and submitted with the annual report by September 30, 2022.
- * DEP has *modified* the list of authorized non-stormwater discharges to the MS4 as follows:
 - Potable drinking water from hydrant flushing or line testing is only permitted if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC)
 - Residential (i.e., not commercial) vehicle wash water ONLY where cleaning agents are not utilized.
 - Dechlorinated swimming pool water discharges are not authorized to be released into the MS4
 - In addition to air conditioning condensate, the discharge of non-contaminated water from geothermal systems is authorized.
- Update and maintain mapping as necessary

MCM #3 - Illicit Discharge Detection and Elimination (cont.)

- ▣ **Implement program to detect non-storm water in system.**
 - *** Identify Priority Outfalls and sample those annually. These are areas that have high-risk activities or a history of water pollution problems.**
 - **Inspect all other identified MS4 Outfalls at least once by March 15, 2023.**
 - *** Sampling is required if discharge is observed to have any color, odor, or turbidity.**
- ▣ **Educate community on problems related to dumping in storm sewers**
 - **Promote recycling programs for commons wastes such as motor oil and antifreeze (Cumberland County Household Hazardous Waste)**
 - **Provide a reporting mechanism for illicit discharges that is available to the general public**



Lower Allen Township, PA

March 29 at 11:18 AM · 🌐

Cumberland County Household Hazardous Waste Program:

New Program Format for 2019: Appointments required and a fee of \$0.30/lb will be charged.

Participants must sign up for an appointment in advance. Appointment slots are available in 15 minute increments and are limited to 12 customers per slot. ... [See More](#)



CCPA.NET

2019 Household Hazardous Waste Drop-Off Program | Cumberland County, PA - Official Website

Create an Account - Increase your productivity, customize your experience, and engage in...



MCM #4 - Construction Site Storm Water Runoff Control

- *Enact DEP's model ordinance or update our existing ordinance by September 30, 2022.**
- Coordinate with Cumberland County Conservation District**
 - Erosion and Sediment Control Program**
 - NPDES Construction Storm Water Permitting for sites with over one acre of disturbance**
- Educate construction industry – add contractors/builders to Target Audience List**
- Provide educational material to contractors working in Lower Allen Township**

MCM #5 - Post-Construction Storm Water Management

- ▣ ***Adopt PA DEP's model storm water management ordinance by September 30, 2022. Develop and implement measure to encourage Low Impact Development (LID) in new development and re-development**
- ▣ **Ensure proper operation and maintenance of post-construction controls**
- ▣ **Continue BMP monitoring through annual mailing and reporting system**
 - **All BMPS that were installed to meet the requirements in the NPDES permit for stormwater discharges associated with construction activities approved since March 10, 2003.**

MCM #6 - Pollution Prevention/ Good Housekeeping

- ❑ Implement O & M program that focuses on pollution prevention**
- ❑ Train municipal employees on good housekeeping practices – Lower Allen has held police, fire, and new employee training within the reporting period . Public works training scheduled for later this month.**
- ❑ Educate community on pollution prevention**

Pollutant Control Measures (PCMs)

- PADEP has developed appendices for PCMs in the 2018 PAG-13 General Permit**
- The appendices are related to Pathogens (Appendix B), and Priority Organic Compounds (Appendix C).**
- PCMs requirements include the development of maps, an inventory of known or suspected sources of pollutants, and submission of a report documenting investigations of suspected sources**

PCMs (cont.)

- **Cedar Run is listed as impaired by Pathogens on the PADEP MS4 Requirements table**
- **Yellow Breeches is listed as impaired by Priority Organic Compounds on the PADEP MS4 Requirements table**

PADEP MS4 REQUIREMENTS MAPPING



Patrick McDonnell, Secretary

MS4 Requirements

MS4 Requirements

BACKGROUND

Municipalities and other entities such as universities and prisons that meet certain standards must obtain NPDES permit coverage for discharges of stormwater from their municipal separate storm sewer systems (MS4s).

A municipal separate storm sewer is any conveyance or system of conveyances (including but not limited to streets, ditches, and pipes) that is: owned by a municipality or other public body (created under state law) having jurisdiction over disposal of sewage, industrial wastes, stormwater or other wastes; designed or used for collecting or conveying stormwater; not a combined sewer (i.e., not intended for both sewage and stormwater); AND not part of a publicly owned treatment works (POTW).

Additional information regarding permitting requirements can be found at the [Pennsylvania Municipal Stormwater Homepage](#).

Help is available by clicking the question mark icon in the header.

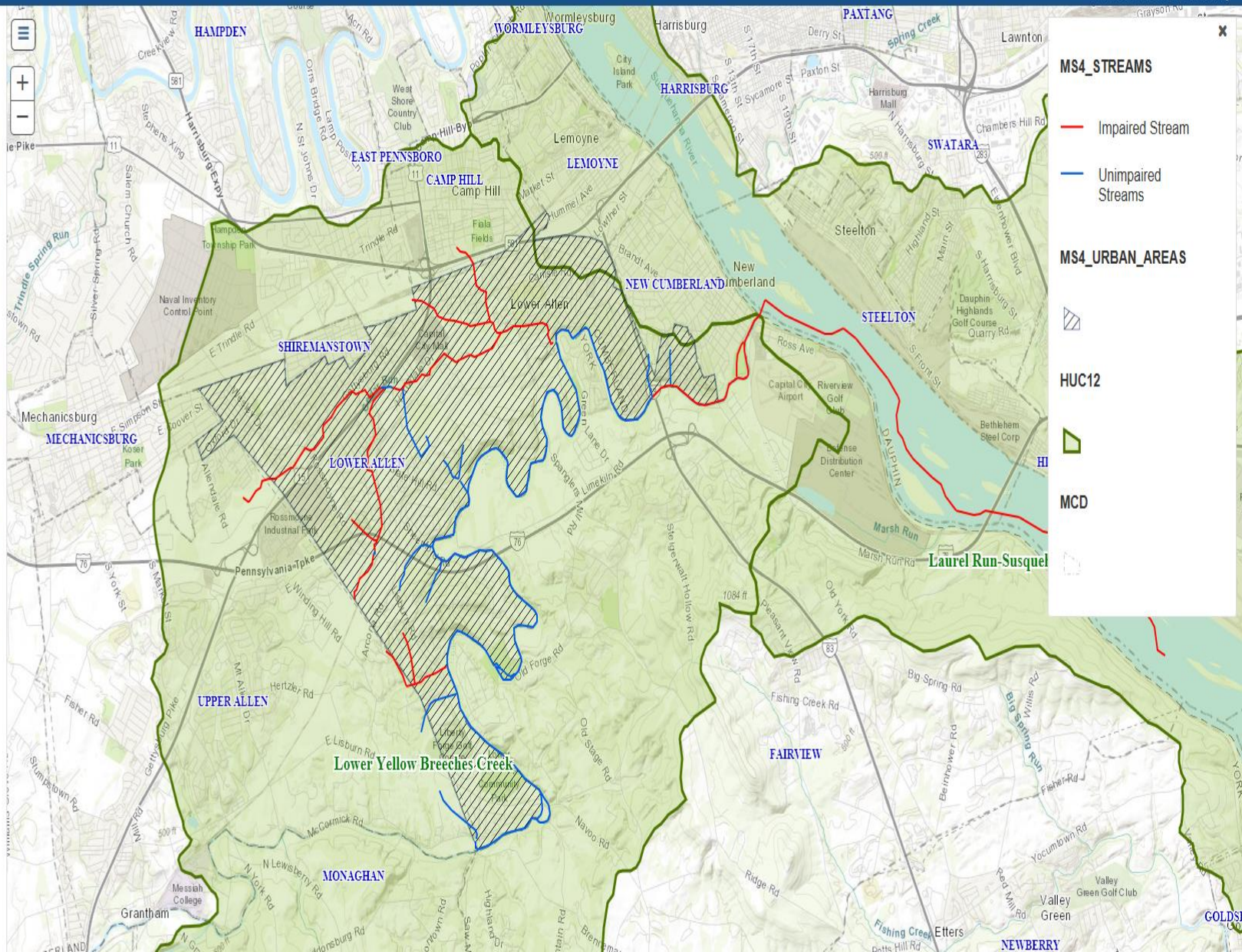
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CUMBERLAND

Select a Municipality

LOWER ALLEN TWP

Click to View Features



Lower Allen Township MS4 Program Near Term Efforts

- Revise and continue implementation of SWMP**
- Begin Implementation of the Approved Chesapeake Bay Pollution Reduction Plan (PRP)**
- Prepare implementation schedule for new permit requirements (PCMs)**
- Complete and submit annual report**

Chesapeake Bay Pollution Reduction Program

- ❑ **LAT is required to reduce pollutants within the next 5 year permit term period by a 10% reduction in sediment**
- ❑ **A PRP (Pollution Reduction Plan) has been approved by DEP**
- ❑ **The PRP consists retrofitting 10 SWM basins to bioretention areas/basins in the township to reduce pollutants to the waters of the commonwealth**
- ❑ **PADEP Grants were obtained for the Public Works Basin and the Sheepford Crossing West Basin**

Lower Allen Township MS4 Program Longer Term Efforts

- ❑ Revise Target audience lists as needed**
- ❑ Implement program changes in PAG - 13 – ordinance adoption**

Public Comments

Questions?

For More Information. . .

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Township MS4 Coordinator