

Application Type Renewal
Facility Type MS4
Permit Type Individual

NPDES PERMIT FACT SHEET
MS4s


Application No. PAI130035
APS ID 950316
Authorization ID 1198089

Applicant and Facility Information

Applicant Name	<u>Telford Borough Bucks & Montgomery County</u>	Facility Name	<u>Telford Borough MS4 UA</u>
Applicant Address	<u>122 Penn Avenue</u> <u>Telford, PA 18969</u>	Facility Address	<u>122 Penn Avenue</u> <u>Telford, PA 18969-1912</u>
Applicant Contact	<u>Mark Fournier</u>	Facility Contact	<u>Mark Fournier</u>
Applicant Phone	<u>(215) 723-5000</u>	Facility Phone	<u>(215) 723-5000</u>
Client ID	<u>143255</u>	Site ID	<u>613522</u>
SIC Code	<u>9199</u>	Municipality	<u>Telford Borough</u>
SIC Description	<u>Public Admin. - Genral Government, Nec</u>	County	<u>Montgomery</u>
Date Application Received	<u>September 13, 2017</u>		
Date Application Accepted	<u></u>		
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated</u>		

Internal Review and Recommendations

See attached.

Approve	Deny	Signatures	Date
X		 Ian Quinlan / Environmental Engineering Specialist	July 5, 2022
X		<i>Elizabeth Mahoney</i> Elizabeth Mahoney/Environmental Group Manager	July 5, 2022

Internal Review and Recommendations



MS4 Urban Area Report
TELFORD BORO, Montgomery County

INDIVIDUAL PERMIT REQUIRED: Yes	REASON: TMDL Plan	NPDES ID: PAG130133
IMPAIRED DOWNSTREAM WATERS	REQUIREMENTS	OTHER CAUSES OF IMPAIRMENT
Indian Creek TMDL	TMDL Plan-Nutrients (4a) TMDL Plan-Nutrients (4a)	
Indian Creek	Appendix E-Siltation (4a)	Cause Unknown TDS (4a)
Mill Creek	Appendix E-Siltation (5)	Water/Flow Variability (4c)
Skippack Creek	Appendix E-Excessive Algal Growth Nutrients (5)	
Skippack Creek Watershed TMDL	TMDL Plan-Siltation (4a)	

Internal Review and Recommendations

The MS4 must comply with Appendix E for the Indian and Mill Creek. The MS4 is meeting their Indian Creek Nutrient TMDL short Term goal by meeting the 10% siltation in the PRP. The MS4 does not need to meet Skippack requirements due to only a small area of the Borough being in the Skippack watershed.

Indian Creek Load

Indian Creek Watershed	
Current Sediment Loading from 2008 TMDL	58,772 lbs/year
Total Area of Indian Creek Watershed in Telford Borough	0.355 sq. miles
Additional Watershed in Borough Park located in Franconia Township	0.009 sq. miles
Total Indian Creek Watershed Area within Borough's Responsibility	0.364 sq. miles
Parsed Area	0.055 sq. Miles
MS4 Planning Area in Indian Creek Watershed	0.309 sq. miles
% of Watershed in MS4 Planning Area	84.9%
Portion of Sediment Load Attributed to MS4 Planning Area	49,897 lbs/year
Reduction from Existing BMPs (See below)	11,980 lbs/year
Current Load for Telford Borough's MS4 in the Indian Creek Watershed	37,917 lbs/year
Reduction Requirement	10%
Required Sediment Reduction	3,792 lbs/year

Proposed BMPs for Indian Creek Watershed	Sediment Reduction (lbs/year)
PIC #1 - Stover Park Bioswale	21,674
Total Proposed Sediment Reduction	21,674
Required Sediment Reduction	3,792

Alternate BMPs for Indian Creek Watershed	Sediment Reduction (lbs/year)
PIC #2 - Franconia Park Stream Restoration – 100 LF	4,488
PIC #3 - Street Sweeping	383
PIC #4 - Inlet Cleaning	1,896
Total Proposed Sediment Reduction	6,767

Internal Review and Recommendations

PROPOSED BMPS FOR PRP SEDIMENT REQUIREMENT:

PMC #1: Bioswale at Hunters Lane - North

A bioswale was constructed along Hunters Lane in 2018 with a grant and assistance from the Perkiomen Watershed Conservancy.

Location of Work:	40.321302, -75.318715
Drainage Area to Bioswale:	8.22 acres
Sediment Load to Bioswale:	5,990 lbs/year
Reduction Rate from BMP Effectiveness Values:	80%
Sediment Reduction Achieved:	4,792 lbs/year
Annual Sediment Removal Rate for Bioswale:	4,792 lbs/year

PMC #2: Bioswale at Hunters Lane - South

A second bioswale is proposed to treat the runoff from the southern storm sewer system at Hunters Lane.

Location of Work:	40.320909, -75.318685
Drainage Area to Bioswale:	21.97 acres
Sediment Load to Bioswale:	19,224 lbs/year
Reduction Rate from BMP Effectiveness Values:	80%
Sediment Reduction Achieved:	15,379 lbs/year
Annual Sediment Removal Rate for Bioswale:	15,379 lbs/year

Annual Sediment Removal Proposed:	20,171 lbs/year
Required Annual Sediment Removal for Permit Period:	19,984 lbs/year

Internal Review and Recommendations

PROPOSED ALTERNATE BMPS:

PMC #3: Bioswale at Village Green

A potential alternate BMP would be to create a bioswale for the runoff entering the detention basin in the Village Green development.

Location of Work:	40.326932, -75.323941
Drainage Area to Bioswale:	10.28 acres
Sediment Load to Bioswale:	8,630 lbs/year
Reduction Rate from BMP Effectiveness Values:	80%
Sediment Reduction Achieved:	6,904 lbs/year
Annual Sediment Removal Rate for Bioswale:	6,904 lbs/year

PMC#4: Street Sweeping

The Borough sweeps all streets in the Borough several times a year. If additional reductions are needed to achieve the required sediment reductions, the Borough will document that the roads in the MS4 Planning area are swept 4 times per year

Calculation using Expert Panel Report for Street and Storm Drain Cleaning Practices, 5/19/16.
One impervious acre equals one curb lane mile. (pg. 6 of Expert Panel Report)

Location of Work: Throughout MS4 Planning Area in Mill Creek Watershed.

Miles of Roads in Mill Creek MS4 Planning Area:	5.96 miles
Curb Lane miles per mile of road:	2
Impervious Acres:	11.92 acres
Sediment Loading Rate for Impervious Area	1,839 lbs/acre/year
Sediment Loading for Roads in Mill Creek MS4 Planning /	21,921 lbs/year
% Sediment Reduction for 4 passes/year	2%
Annual Sediment Removal	438 lbs/year

Annual Sediment Removal Rate for Street Sweeping: 438 lbs/year

PMC #5: Inlet Cleaning

The Borough cleans the inlets in the Borough as needed. If additional reductions are needed to achieve the required sediment reductions, the Borough will document that the sediment removal from the inlets in the MS4 Planning area

Number of inlets cleaned per year	157 inlets
Annual Sediment Removal	9,910 lbs/year
See calculation for Sediment Reductions from Inlet Cleaning.	
Maximum permitted for PRP Plan	9,992 lbs/year
BMP Effectiveness Values, PADEP 5/2016 only allows that 50% of the total pollutant reduction be met through this BMP.	

Maximum Allowable Reduction from Inlet Cleaning 9,910 lbs/year

Internal Review and Recommendations

Funding:

The Borough will budget for the implementation of the proposed BMPs within the 5-year permit period. The work is expected to be performed by the Borough's Public Works Department.

Operation and Maintenance (O&M)

O&M for Bioswales – The following O&M tasks should be performed annually and after major storm events:

- Inspect and correct erosion problems, damage to vegetation, and sediment and debris accumulation; reseed/replant as needed
- Inspect vegetation on side slopes for erosion and formation of gullies; correct as needed
- Inspect for pools of standing water; regrade as needed
- Mow and/or trim vegetation to suppress weeds and invasive vegetation
- Inspect the entry and exit points of the swale for signs of erosion or blockage; correct as needed

O&M for Street Sweeping & Inlet Cleaning

- Schedule during dry weather
- Document quantity of material removed, percent of sediment in material, and location of streets swept and/or inlets cleaned

Public Participation

The TMDL/ PRP public notice was published in local newspaper on April 1, 2022. The plan was made available for public review in the township building and in its website from April 1 to May 9. A comment period was provided from April 1 to May 9. A public meeting was held on May 2, which included this TMDL Plan in the agenda. The township received no comments from the public on TMDL Plan.

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.