

Application Type Renewal
Facility Type MS4
Permit Type Individual

**NPDES PERMIT FACT SHEET
MS4s**

Application No. PAI130057
APS ID 952421
Authorization ID 1202102

Applicant and Facility Information

Applicant Name	<u>Montgomery Township Montgomery County</u>	Facility Name	<u>Montgomery Township Montgomery County MS4 UA</u>
Applicant Address	<u>1001 Stump Road</u> <u>Montgomeryville, PA 18936-9605</u>	Facility Address	<u>1001 Stump Road</u> <u>Montgomeryville, PA 18936-9605</u>
Applicant Contact	<u>Carolyn McCreary</u>	Facility Contact	<u>Carolyn McCreary</u>
Applicant Phone	<u>(215) 393-6920</u>	Facility Phone	<u>(215) 393-6920</u>
Client ID	<u>62407</u>	Site ID	<u>617131</u>
SIC Code	<u>9199</u>	Municipality	<u>Montgomery Township</u>
SIC Description	<u>Public Admin. - Genral Government, Nec</u>	County	<u>Montgomery</u>
Date Application Received	<u>September 14, 2017</u>		
Date Application Accepted	<u>October 12, 2017</u>		
Purpose of Application	<u>Individual Permit, Formerly PAG130016.</u>		

Internal Review and Recommendations

In the interest of issuing this permit in a timely manner, DEP has made the decision to issue this permit with a compliance schedule.

MONTGOMERY TWP	PAG130016	Yes	TMDL Plan	Little Neshaminy Creek	Appendix B-Pathogens (5), Appendix C-PCB (5), Appendix E-Nutrients, Organic Enrichment/Low D.O. (5)	Water/Flow Variability (4c)
				Neshaminy Creek	Appendix B-Pathogens (5), Appendix E-Nutrients, Organic Enrichment/Low D.O. (5)	
				Neshaminy Creek TMDL	TMDL Plan-Siltation, Suspended Solids (4a)	
				Park Creek	Appendix B-Pathogens (5), Appendix C-PCB (5), Appendix E-Nutrients (5)	Water/Flow Variability (4c)
				Trewellyn Creek	Appendix E-Nutrients (4a)	Water/Flow Variability (4c)
				Warrington Lake	Appendix E-Nutrients (5)	Exotic Species (5)
				West Branch Neshaminy Creek	Appendix E-Excessive Algal Growth, Nutrients, Organic Enrichment/Low D.O. (5)	Water/Flow Variability (4c)
				Wissahickon Creek	Appendix E-Nutrients (4a), Appendix B-Pathogens (5)	Other Habitat Alterations, Water/Flow Variability (4c)
				Wissahickon TMDL	TMDL Plan-Siltation, Suspended Solids (4a)	Cause Unknown (4a)

The following technical deficiencies must be resolved:

Mapping:

1. All structural BMP's, existing and proposed, must be mapped and must be located within the planning area. It appears that some existing BMPs are located in parsed areas.
2. Township owned lands may not be parsed out of the planning area.

Approve	Deny	Signatures	Date
x		<i>Carrie Konnovitch</i> Carrie M Konnovitch, P.E. / Environmental Engineer Trainee	August 6, 2024
x		<i>Elizabeth Mahoney</i> Elizabeth A Mahoney / Environmental Group Manager	08/07/2024

Internal Review and Recommendations

Existing Load Calculations:

1. Plans should be revised to include Latitude/Longitude, permit number, a statement of functionality and Operations and Maintenance for each existing BMP.
2. Existing loads have been calculated for all sewersheds, however, we wanted to let you know that you could combine sewersheds into two, Wissahickon and Neshaminy, if it is easier. If you decide to combine the Neshaminy sewersheds, please include the methodology used to determine the reduction requirement.

TMDL Objectives:

1. It appears that the BMP reduction loads are being used to directly satisfy the reduction requirements. The BMPs constructed before the TMDL was established can only be used to reduce the baseline load. The BMPs constructed after the TMDL was established can be used to achieve the long term TMDL goal as long as they are not Ch. 102 BMPs. If the municipality wants to meet the short term 10% goal, this goal must be achieved by installing proposed BMPs within the permit term.
2. A number of the existing BMP reduction rates do not meet the rates provided in DEP's BMP Effectiveness Values document. All MS4s must use the values contained within DEP's BMP Effectiveness Values document (3800-PM-BCW0100m) or Chesapeake Bay Program expert panel reports for BMPs listed in those resources when determining pollutant load reductions in TMDL Plans.

Selection of BMP's:

1. Plan includes Mapshed/Model my watershed output and summary tables, however, more information would be helpful to demonstrate load reductions.
2. Please revise the plan to include proposed BMP's to meet the reduction requirements for the municipality.

Public Participation

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.