

Application Type Renewal  
Facility Type MS4  
Permit Type Individual


**NPDES PERMIT FACT SHEET**  
**MS4s**

Application No. PAI130065  
APS ID 952575  
Authorization ID 1202347

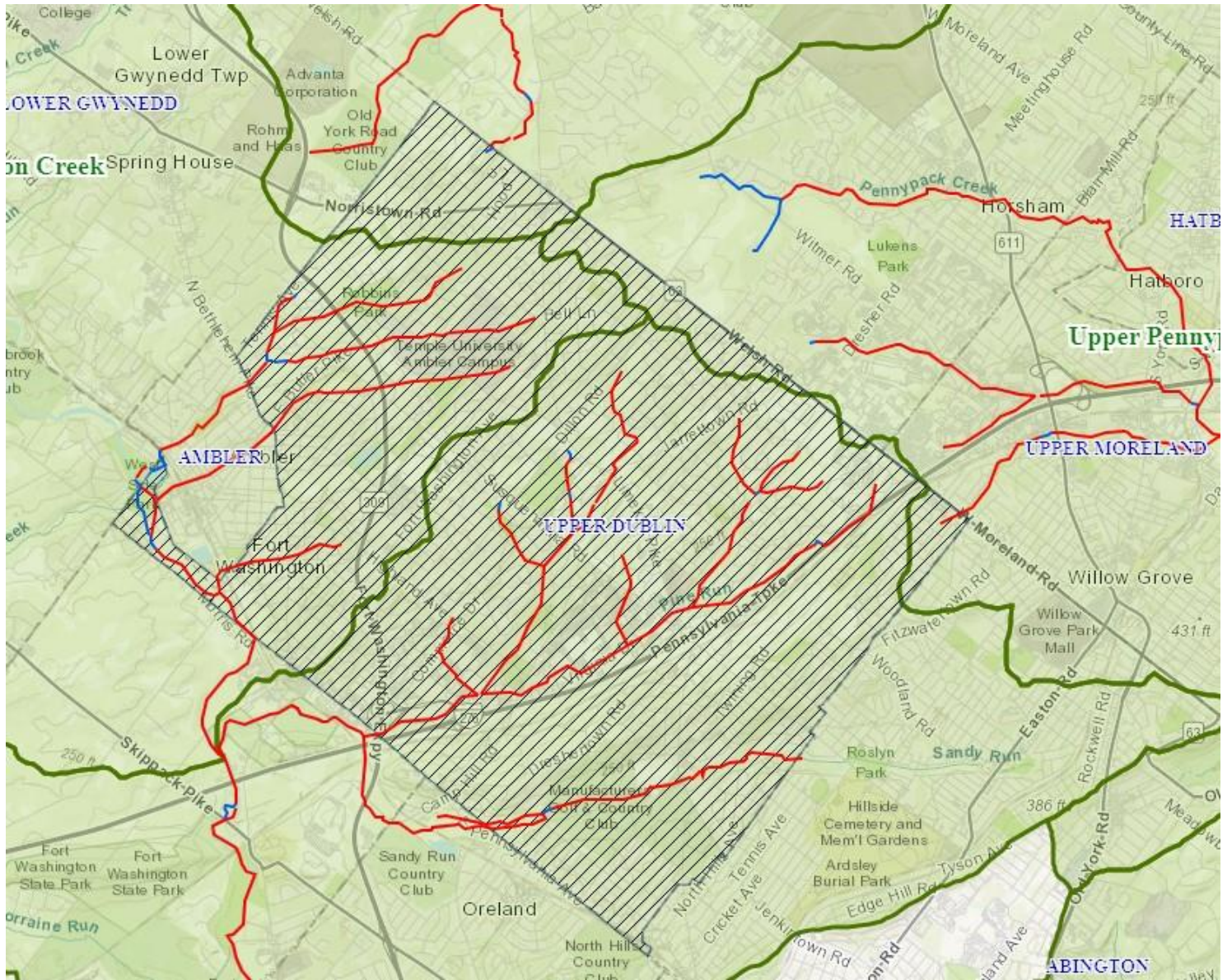
**Applicant and Facility Information**

Applicant Name	<u>Upper Dublin Township Montgomery County</u>	Facility Name	<u>Upper Dublin Township MS4 UA</u>
Applicant Address	<u>801 Loch Alsh Avenue</u> <u>Fort Washington, PA 19034</u>	Facility Address	<u>801 Loch Alsh Avenue</u> <u>Fort Washington, PA 19034</u>
Applicant Contact	<u>Kurt Ferguson</u>	Facility Contact	<u>Thomas Fountain</u>
Applicant Phone	<u>(215) 643-1600</u>	Facility Phone	<u>(215) 643-1600</u>
Client ID	<u>52547</u>	Site ID	<u>788516</u>
SIC Code	<u>9199</u>	Municipality	<u>Upper Dublin Township</u>
SIC Description	<u>Public Admin. - Genral Government, Nec</u>	County	<u>Montgomery</u>
Date Application Received	<u>September 15, 2017</u>		
Date Application Accepted	<u>October 12, 2017</u>		
Purpose of Application	<u>Formerly PAG130075.</u>		

**Internal Review and Recommendations**

Approve	Deny	Signatures	Date
X		 Ian Quinlan/ Environmental Engineer	March 15, 2024
x		<i>Elizabeth Mahoney</i> Elizabeth Mahoney/Environmental Group Manager	3/15/2024

Internal Review and Recommendations





**Internal Review and Recommendations**

<b>INDIVIDUAL PERMIT REQUIRED:</b> Yes	<b>REASON:</b> TMDL Plan	<b>NPDES ID:</b> PAG130075
<b>IMPAIRED DOWNSTREAM WATERS</b>	<b>REQUIREMENTS</b>	<b>OTHER CAUSES OF IMPAIRMENT</b>
Pine Run	Appendix B-Pathogens (4a) Appendix E-Nutrients (4a)	Other Habitat Alterations Water/Flow Variability (4c)
Little Neshaminy Creek	Appendix B-Pathogens (5) Appendix C-PCB (5) Appendix E-Nutrients Organic Enrichment/Low D.O. (5)	Water/Flow Variability (4c)
Wissahickon Creek	Appendix E-Nutrients (4a) Appendix B-Pathogens (5)	Water/Flow Variability (4c)
Pennypack Creek	Appendix E-Siltation (5)	Cause Unknown (5) Flow Alterations Other Habitat Alterations Water/Flow Variability (4c)
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)
Sandy Run	Appendix B-Pathogens (4a) Appendix E-DO/BOD Nutrients (4a)	Other Habitat Alterations Water/Flow Variability (4c)
Unnamed Tributaries to Wissahickon Creek		Other Habitat Alterations (4c)
Wissahickon TMDL	TMDL Plan-Siltation Suspended Solids (4a)	Cause Unknown (4a)

<b>Wissahickon Creek</b>	
Current Annual Sediment Load in Wissahickon Creek from Upper Dublin Township	1,257,003 lbs/year
Wasteload Allocation for Wissahickon Creek	464,608 lbs/year
Sediment Load Reduction required for Wissahickon Creek	792,395 lbs/year
% of Watershed in Upper Dublin Township's MS4 Planning Area	62.8%
Area of Watershed in Township is 12.040 sq. mi. Area that is parsed which does not flow through Township owned roads, property or storm sewers is 4.478 sq. mi. Therefore, the Township's MS4 Planning Area is 7.562 sq. mi. ( $7.562/12.040 \times 100 = 62.8\%$ )	
Current Load for MS4 Planning Area ( $1,257,003 \times 62.8\%$ )	789,398 lbs/year
TMDL Sediment Reduction Requirement from TMDL Study	63%

**Internal Review and Recommendations**

Required TMDL Sediment Reduction (789,398 x 63%)	497,321 lbs/year
Minimum Reduction Requirement for 2018 Permit Period	10%
Minimum Sediment Reduction for 2018 Permit Period (789,398 x 10%)	78,940 lbs/year

**Best Management Practices (BMPs) Implemented in the Wissahickon Creek Watershed since 2003**

BMP ID	Location	Type	BMP Effectiveness Value – Sediment <sup>1</sup>	Latitude & Longitude	Date Constructed	Ownership	Sediment Reduction from BMP (lbs/year) <sup>2</sup>	Is BMP Functioning Properly?
WC #1	Tannerie Run – Basin at Upper Dublin Sports Park	Conversion to Dry Extended Detention Basins	50%	40°09'30.2"N 75°11'59.4"W	2005	Upper Dublin Township	4,802	Yes
WC #2	New Basin at Franklin Park	Dry Detention Basin	10%	40°10'17.1"N, 75°10'38.9"W	2005	Upper Dublin Township	699	Yes
WC #3	Modification of Basin at Rue Charmille	Dry Extended Detention Basin	50%	40°08'24.4"N 75°12'53.0"W	2006	Private Homeowners	928	Yes
WC #4	Modification of Stormwater Basin at Morningside Circle	Dry Extended Detention Basin	50%	40°08'45.0"N, 75°09'26.2"W	2008	Upper Dublin Township	12,986	Yes
WC #5	Conversion of Stormwater Two Basins at Aiden Lair Park	Dry Extended Detention Basins	50%	40°09'07.2"N, 75°09'46.3"W, 40°09'04.6"N, 75°09'44.8"W	2009	Upper Dublin Township	12,370	Yes
WC #6	Construction of new underground basin on Lenape Drive	Dry Detention Basin	10%	40°08'00.7"N, 75°09'37.8"W	2009	Upper Dublin Township	380	Yes

**Internal Review and Recommendations**

BMP ID	Location	Type	BMP Effectiveness Value – Sediment <sup>1</sup>	Latitude & Longitude	Date Constructed	Ownership	Sediment Reduction from BMP (lbs/year)	Is BMP Functioning Properly?
WC #7	Conversion of Stormwater Basin at Pine Run Park	Dry Extended Detention Basin	50%	40°09'35.8"N, 75°09'32.3"W	2011	Upper Dublin Township	23,829	Yes
WC #8	Rapp Run Flood Retarding Structure	Approved for consideration as Dry Extended Detention Basin	50%	40°08'30.9"N, 75°11'03.1"W	2013	Upper Dublin Township	381,047	Yes
WC #9	Pine Run Flood Retarding Structure	Approved for consideration as Dry Extended Detention Basin	50%	40°08'35.1"N, 75°09'53.9"W	2013	Upper Dublin Township	469,483	Yes
<b>Total Sediment Reduction (lbs/year)</b>							<b>906,524</b>	

**Internal Review and Recommendations**

<b>Little Neshaminy Creek</b>	
Current Annual Sediment Load in Little Neshaminy Creek	8,369,480 lbs/year
Wasteload Allocation for Little Neshaminy Creek	6,937,351 lbs/year
% of Wasteload Allocation Attributed to Upper Dublin Township (PADEP Distribution, 1/23/17)	3%
Current Load Attributed to Upper Dublin Township	251,084 lbs/year
% of Watershed in Upper Dublin Township's MS4 Planning Area	69.5%
Area of Watershed in Township is 0.718 sq. mi. Area that is parsed which does not flow through Township owned roads, property or storm sewers is 0.219 sq. mi. Therefore, the Township's MS4 Planning Area is 0.498 sq. mi. ( $0.498/0.718 \times 100 = 69.5\%$ )	
Current Load for MS4 Planning Area ( $251,084 \times 69.5\%$ )	174,503 lbs/year
Less BMPs implemented before 2003 (See Appendix E)	4,796 lbs/year
Adjusted Current Load for MS4 Planning Area ( $174,503 - 4,796$ )	169,707 lbs/year
TMDL Sediment Reduction Requirement from TMDL Study	17%
Required TMDL Sediment Reduction ( $169,707 \times 17\%$ )	28,850 lbs/year
Reduction Requirement for 2018 Permit Period	10%
Sediment Reduction for 2018 Permit Period ( $169,707 \times 10\%$ )	16,971 lbs/year

**Existing BMPs in Little Neshaminy Creek Watershed**

BMP ID	Location	Type	BMP Effectiveness Value – Sediment <sup>1</sup>	Latitude & Longitude	Date Constructed	Ownership	Is BMP Functioning Properly?
ENC #1	Dogwood Lane Basins (3)	Dry Detention Basins	10%	40°10'58.9"N 75°11'16.8"W, 40°10'57.4"N 75°11'13.3"W, 40°10'55.8"N 75°11'10.8"W	Early 1990s	Meadowview Est. Homeowner Association	Yes
ENC #2	Daisy Lane Basin	Dry Detention Basin	10%	40°11'04.5"N 75°11'28.7"W	Early 1990s	Private Homeowner	Yes
ENC #3	Herold Court Basin	Dry Detention Basin	10%	40°10'41.1"N 75°11'03.1"W	Early 2000s	Mann Road Associates	Yes
ENC #4	Chaucer Drive Basin	Dry Detention Basin	10%	40°10'40.1"N 75°11'12.9"W	1990	Private Homeowner	Yes
ENC #5	Hood Lane Basin	Dry Detention Basin	10%	40°10'42.3"N 75°11'23.3"W	Early 1990s	Private Homeowner	Yes

**Internal Review and Recommendations**

<b>Best Management Practice</b>	<b>Sediment Reduction (lbs/year)</b>
Bank Stabilization (379 LF)	17,010
<b>Total Reduction for 2018 Permit</b>	<b>17,010</b>
Required 10% Reduction for 2018 Permit	16,971
Amount Remaining to be reduced for 2018 permit	-39
<b>To Complete the TMDL Requirement</b>	
Additional Bank Stabilization (264 LF additional)	11,848
Total to complete TMDL (643 LF)	28,858
Required 17% Reduction for TMDL	28,850

<b>Pennypack Creek</b>	<b>Sediment (lbs/year)</b>
Current Load in MS4 Planning Area	243,320
Reduction from Existing BMPs	17,057
Reduced Current Load	226,263
<b>10% Reduction Required</b>	<b>22,626</b>

**Existing BMPs in Little Neshaminy Creek Watershed**

BMP ID	Location	Type	BMP Effectiveness Value – Sediment <sup>1</sup>	Latitude & Longitude	Date Constructed	Ownership	Is BMP Functioning Properly?
EPC #1	Spring Mill Drive Basin	Dry Extended Detention Basins	60%	40°09'59.8"N 75°09'37.3"W	Early 1990s	Dublin Meadows Homeowners Association	Yes
ENC #2	Williams Park Rain Garden	Rain Garden	55%	40°10'33.0"N 75°10'47.8"W	Unknown	Upper Dublin Township	Yes

<b>Best Management Practice</b>	<b>Sediment Reduction (lbs/year)</b>
Stream Restoration (505 LF)	22,664
<b>Total Sediment Reduction</b>	<b>22,664</b>
Required Reduction for 2018 Permit Period	22,626
Remaining Amount needed for 2018 Permit Period (Requirement exceeded)	-38

Funding:

**Internal Review and Recommendations**

The Township will budget for the implementation of the proposed BMPs within the 5-year permit period.

BMP	Operation and Maintenance
Stream Restoration	<ul style="list-style-type: none"> <li>• Inspected annually and after storm events with 3 inches or greater rainfall.</li> <li>• Monitored for invasive species or damage to vegetation. Invasive species removal and provision of supplemental vegetation will be provided, as needed.</li> <li>• Stream banks will be inspected for erosion and addressed as needed.</li> </ul>

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.