

Application Type Renewal
Facility Type MS4
Permit Type Individual

NPDES PERMIT FACT SHEET MS4s

Application No. PAI130067
APS ID 952580
Authorization ID 1202357

Applicant and Facility Information

<p>Applicant Name <u>Whitemarsh Township Montgomery County</u></p> <p>Applicant Address <u>616 Germantown Pike</u> <u>Lafayette Hill, PA 19444</u></p> <p>Applicant Contact <u>Craig McAnally</u></p> <p>Applicant Phone <u>(610) 825-3535</u></p> <p>Client ID <u>94327</u></p> <p>SIC Code <u>9199</u></p> <p>SIC Description <u>Public Admin. - Genral Government, Nec</u></p> <p>Date Application Received <u>September 15, 2017</u></p> <p>Date Application Accepted <u>October 13, 2017</u></p> <p>Purpose of Application <u>Individual Permit, Formerly PAG130103.</u></p>	<p>Facility Name <u>Whitemarsh Township MS4 UA</u></p> <p>Facility Address <u>616 Germantown Pike</u> <u>Lafayette Hill, PA 19444</u></p> <p>Facility Contact <u>Craig McAnally</u></p> <p>Facility Phone <u>(610) 825-3535</u></p> <p>Site ID <u>613472</u></p> <p>Municipality <u>Whitemarsh Township</u></p> <p>County <u>Montgomery</u></p>
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Internal Review and Recommendations

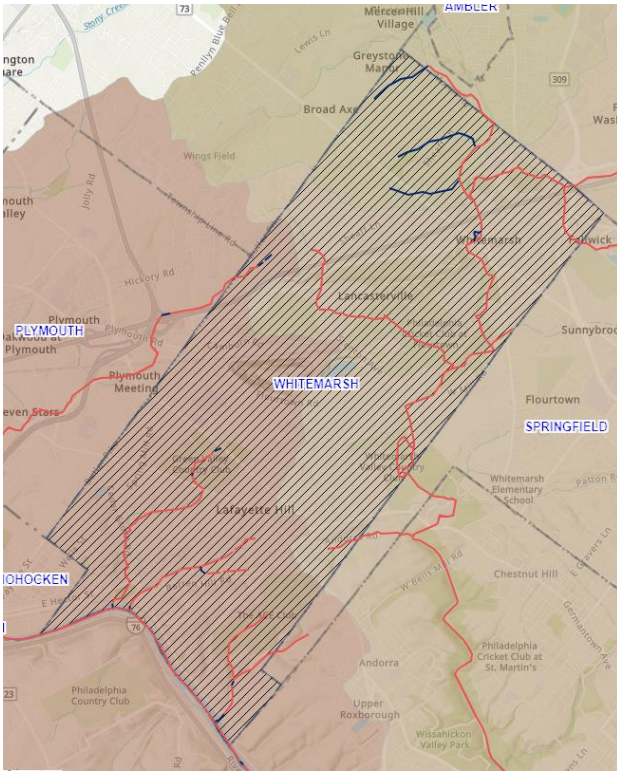
In the interest of issuing this permit in a timely manner, DEP has made the decision to issue this permit with a compliance schedule.

WHITEMARSH TWP	PAG130103	Yes	TMDL Plan	Pine Run	Appendix B-Pathogens (4a), Appendix E-Nutrients (4a)	
				Wissahickon TMDL	TMDL Plan-Siltation, Suspended Solids (4a)	Cause Unknown (4a)
				Unnamed Tributaries to Wissahickon Creek		Flow Alterations, Other Habitat Alterations (4c)
				Schuylkill River PCB TMDL	Appendix C-PCB (4a)	
				Wissahickon Creek	Appendix E-Nutrients (4a), Appendix B-Pathogens (5)	Water/Flow Variability (4c)
				Plymouth Creek	Appendix E-Siltation (5)	Water/Flow Variability (4c)
				Delaware River Estuary PCB TMDLs	Appendix C-PCB, Priority Organics (4a)	
				Sandy Run	Appendix B-Pathogens (4a), Appendix E-DO/BOD, Nutrients (4a)	Other Habitat Alterations, Water/Flow Variability (4c)
				Unnamed Tributaries to Schuylkill River	Appendix E-Excessive Algal Growth, Siltation (5)	Cause Unknown (5), Water/Flow Variability (4c)

WHITEMARSH TWP	PAG130103	Lower Wissahickon Creek, Upper Wissahickon Creek	Pine Run, Sandy Run, Wissahickon Creek, Wissahickon TMDL	Appendix B-Pathogens, Appendix E-DO/BOD, Excessive Algal Growth, Nutrients, Siltation, TMDL Plan-Siltation, Suspended Solids
		Plymouth Creek-Schuylkill River	Plymouth Creek, Unnamed Tributaries to Schuylkill River, Wissahickon TMDL	Appendix E-DO/BOD, Excessive Algal Growth, Nutrients, Siltation, TMDL Plan-Siltation, Suspended Solids
		City of Philadelphia-Schuylkill River, Plymouth Creek-Schuylkill River	Schuylkill River PCB TMDL	Appendix C-PCB

Approve	Deny	Signatures	Date
x		<i>Carrie Konnovitch</i> Carrie M Konnovitch, P.E. / Environmental Engineer Trainee	August 12, 2024
x		<i>Elizabeth Mahoney</i> Elizabeth A Mahoney / Environmental Group Manager	08/12/2024

Internal Review and Recommendations



The following technical deficiencies were sent to the applicant on March 13, 2024:

Mapping:

- The scale of the Outfall and Watershed maps included in the TMDL and PRP plans should be revised so that outfalls and parsed areas can be clearly identified. All maps should be at a scale of 1"=800' or less.
- Please provide an explanation for each parsed area. Please note, if any municipal infrastructure or property exists in the sewershed to an outfall, then no area within the sewershed to that outfall can be parsed. All Township property, roads and infrastructure should be included within the MS4 planning area.
- The PRP plan does not need to include the BMPs to meet the Wissahickon Creek's nutrient requirement, this will be covered by the Wissahickon's TMDL. The plan may combine the Sandy Run, Pine Run, and unnamed tributaries to Schuylkill into the Plymouth Creek PRP.

Existing Load Calculations

- The PRP and TMDL plans take credit in the form of reduced existing loading by acknowledging existing stormwater BMPs in the Planning Area. However, the information requirements for existing BMPs have not been met. Specifically, a statement that each BMP continues to serve the function it was designed for must be provided.

TMDL Objectives:

- The TMDL plan does not include an analysis of the short- and long-term objectives for the permit term and for ultimately achieving WLAs, respectively.
- The TMDL plan may take the presumptive approach that removing 10% of sediment will effectively satisfy the nutrient reduction requirements for the Wissahickon creek.

Internal Review and Recommendations

Selection of BMPs

- The TMDL and PRP plans indicate that the STEPL tool was used for load reduction calculations. Please resubmit these calculations using DEP's BMP Effectiveness Values document (3800-BCW-0100m) for proposed stormwater BMP's. Additionally, please rename proposed stormwater BMP's in accordance with the BMP Effectiveness Values document.
- It is unclear from the information in the plan as to which BMP(s) are being proposed for implementation. The TMDL plan proposes the use of stormwater inlet filters. As noted in DEP's BMP Effectiveness Values document (3800-BCW-0100m), MS4s may not use this BMP for more than 50% of its required pollutant reductions. DEP requests that you submit an implementation schedule for the proposed BMPs identified in your plan. This schedule should demonstrate that less than 50% of sediment removal is from inlet filters.
- DEP guidance for stormwater inlet filters recommends that the drainage area treated by this BMP may be no greater than 0.5 acre unless it can be demonstrated that the specific system proposed is capable of treating stormwater from larger drainage areas. Please confirm that the proposed Water Quality Filter BMPs are not treating areas larger than 0.50 acres.
- Both the TMDL Plan and PRP indicate that a Rain Barrel collects stormwater from a tributary area of 1875 sf at the township building. The TMDL Plan's Proposed BMP #15 directs all roof drains from the township building to a rain garden. If the proposed BMP collects stormwater from the area previously collected by the rain barrel, then the rain barrel should be removed from the Existing BMP list in both plans, so this area is not counted twice.
- Rain Barrels are not a recommended BMP for MS4 credit due to the extensive O&M Plan required. The municipality would have to inspect each rain barrel after every rain event to ensure that they are being maintain and are emptied regularly. Additionally, rain barrels are not recommended to be used in freezing temperatures and this would limit their effectiveness.
- The TMDL plan includes several proposed raingardens, including some located within bump outs to reduce sediment loads. Guidance from the BMP Manual recommends that rain gardens should generally not exceed a maximum loading ratio of 5:1 (impervious drainage area to infiltration area). Please confirm that the proposed rain gardens will not exceed this recommended loading ratio.
- The TMDL Plan and PRP include street sweeping and tree planting as existing BMPs that have already been installed. Tree planting and street sweeping calculations must be in accordance with the DEP's BMP Effectiveness Values document (3800- BCW-0100m).

Funding:

- The TMDL plan does not identify probable sources of funding for each BMP. Plans need to specify probable sources of funding for each BMP, with alternatives in the event the funding sources do not materialize..

Public Participation:

- After the TMDL plan has been revised to comply with the current term requirements, the required public participation process must be completed.

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.