

Application Type **Renewal**
Facility Type **MS4**
Permit Type **Individual**

**NPDES PERMIT FACT SHEET
MS4s**

Application No. **PAI130086**
APS ID **953829**
Authorization ID **1204433**

Applicant and Facility Information

Applicant Name	<u>Lower Moreland Township Montgomery County</u>	Facility Name	<u>Lower Moreland Township MS4 UA</u>
Applicant Address	<u>640 Red Lion Road</u> <u>Huntingdon Valley, PA 19006-6217</u>	Facility Address	<u>640 Red Lion Road</u> <u>Huntingdon Valley, PA 19006-6217</u>
Applicant Contact	<u>Christopher Hoffman</u>	Facility Contact	<u>Christopher Hoffman</u>
Applicant Phone	<u>(215) 947-3100</u>	Facility Phone	<u>(215) 947-3100</u>
Client ID	<u>29388</u>	Site ID	<u>617490</u>
SIC Code	<u>9199</u>	Municipality	<u>Lower Moreland Township</u>
SIC Description	<u>Public Admin. - Genral Government, Nec</u>	County	<u>Montgomery</u>
Date Application Received	<u>September 18, 2017</u>		
Date Application Accepted	<u></u>		
Purpose of Application	<u>Individual Permit, formerly PAG130027.</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.

LOWER MORELAND TWP	PAG130027	Yes	TMDL Plan	Pennypack Creek	Appendix B-Pathogens (4a), Appendix C-Priority Organics (4a), Appendix E-Organic Enrichment/Low D.O. (4a), Appendix E-Siltation (5)	Cause Unknown (5)
				Poquessing Creek	Appendix E-Excessive Algal Growth (5)	Flow Alterations, Other Habitat Alterations, Water/Flow Variability (4c)
				Unnamed Tributaries to Southampton Creek	Appendix B-Pathogens (4a)	
				Southampton Creek		Flow Alterations, Other Habitat Alterations, Water/Flow Variability (4c)
				Terwood Run	Appendix E-Siltation (5)	Cause Unknown (5)
				Huntingdon Valley Creek	Appendix E-Siltation (5)	Cause Unknown (5)
				Southampton Creek TMDL	TMDL Plan-Nutrients, Organic Enrichment/Low D.O., Siltation (4a)	

An email listing the following technical deficiencies was sent to the applicant on March 22, 2024. A response was requested by May 6, 2024 and has not been received to date.

Application:

- The NOI submitted is for a General Permit. Please submit a new NOI for an Individual MS4 permit.
- The Stormwater Management Ordinance Checklist is out of date and must be resubmitted using the current form. Alternatively, you may provide evidence that a stormwater management ordinance has been enacted that is consistent with the 2022 DEP Model Ordinance.

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

Internal Review and Recommendations

Public Participation:

- The TMDL plan does not provide evidence that it was made available for public review. After the PRP and TMDL plans have been revised in accordance with these comments, please publish notice of the availability of your plans in a newspaper of general circulation, provide for a 30-day comment period, and provide evidence that the plan was made available for public review.
- The PRP and TMDL plans do not provide evidence that a public meeting was held at which the plan was discussed and the public had an opportunity to provide comments. Please provide the minutes for the public meeting.

Mapping:

- The Ward 2 map is missing from the PRP storm sewershed mapping. Please include this map in future submissions.
- The PRP and TMDL plans do not propose any land area parsing and because of this we will accept the submitted aerial photographs. If either plan is revised to parse land, revised mapping which clearly shows outfalls, storm sewers, topography, roads, surface waters, and storm sewersheds must be provided.

Pollutants of Concern:

- The plan incorrectly identifies the pollutant(s) of concern. Please revise the pollutants in accordance with the Pollutant Aggregate Table:
- Additionally, the PRP incorrectly states the pollutant reduction requirements on page 2 of the plan and must be revised in accordance with the following:
- Watersheds that are impaired for sediment are required to reduce the impairment by 10% required of total impairment generated by the watershed. Watersheds that are impaired for nutrients must reduce the TP by 5% and the TN by 3%. Please note that all PRPs and TMDL Plans may “presume” that a 10% sediment reduction will also deliver 5% TP and 3% TN reductions. It is not acceptable to presume that a nutrient reduction will also reduce sediment.

Existing Load Calculations:

- The PRP only contains calculations for Huntingdon Valley Creek and should be revised to include Pennypack Creek, Poquessing Creek and Terwood Run. These calculations may be performed for the combined watershed or separately for each watershed. The Southampton Creek watershed does not need to be included in the PRP since the reductions for this area will be satisfied by the TMDL Plan.

Selection of BMPs:

- It is unclear from the information in the PRP as to which BMPs are being proposed for implementation. The PRP includes calculations for one proposed BMP, however, the MS4 plans submitted show additional proposed BMPs in the PRP planning area. All proposed BMPs must be identified by the BMP names as used in the Chesapeake Bay Model and must be included in the PRP. Please correct and resubmit your plan.
- The PRP proposes one BMP for the Huntingdon Valley Creek watershed. The sediment loading calculations appear to assume the entire drainage area to the basin is impervious. The 80% sediment reduction credit does not conform to the credit that may be claimed through DEP’s BMP Effectiveness Values document (3800-BCW-0100m). Please revise this calculation.
- The PRP and TMDL Plan do not include load reduction calculations for each proposed BMP. Please correct and resubmit your plan.
- Please revise the TMDL plan to include calculations for the proposed street sweeping activities in conformance with the credit that may be claimed through DEP’s BMP Effectiveness Values document (3800-BCW-0100m) or the applicable Chesapeake Bay expert panel report. Please correct and resubmit your plan.
- Please revise the TMDL plan to include calculations for the proposed stormwater inlet filters in conformance

Internal Review and Recommendations

with the credit that may be claimed through DEP's BMP Effectiveness Values document (3800-BCW-0100m). DEP will allow up to 50% of total pollutant reduction requirements to be met through this BMP. 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.

- 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.
- DEP recommends including additional potential BMP's prior to going through the public participation process. If these additional potential BMP's are included in the plan, the township will not have to repeat the public participation process if one or more of the proposed BMP's are not feasible.

TMDL Objectives:

- The TMDL plan does not include an analysis of the short- and long-term objectives for the permit term. Please correct and resubmit your plan.
- Since the TMDL was prepared in 2016, please identify which items from the TMDL Strategy have been implemented and provide an updated implementation strategy.

Funding:

- The PRP and TMDL plan do 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. Please correct and resubmit your plan.

Operation and Maintenance:

- The plan does not identify the entity that will be responsible for the operation and maintenance (O&M) of each proposed BMP. Please correct and resubmit your plan.
- The plan proposes operation and maintenance (O&M) of BMPs that are generally inconsistent with published guidance on BMP O&M specifications. Please provide the source(s) of information establishing the adequacy of the proposed O&M or otherwise correct and resubmit your plan.

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.