

Application Type Renewal
Facility Type MS4
Permit Type Individual

NPDES PERMIT FACT SHEET
MS4s

Application No. PAI132227
APS ID 489923
Authorization ID 1235647

Applicant and Facility Information

Applicant Name	<u>Lower Saucon Township</u>	Facility Name	<u>Lower Saucon Township MS4</u>
Applicant Address	<u>3700 Old Philadelphia Pike</u> <u>Bethlehem, PA 18015-5426</u>	Facility Address	<u>Urbanized Area</u> <u>Lower Saucon Twp, PA</u>
Applicant Contact	<u>Leslie Huhn</u>	Facility Contact	<u>Leslie Huhn</u>
Applicant Phone	<u>(610) 865-3291</u>	Facility Phone	<u>(610) 865-3291</u>
Client ID	<u>71119</u>	Site ID	<u>619315</u>
SIC Code	<u>9199</u>	Municipality	<u>Lower Saucon Township</u>
SIC Description	<u>Public Admin. - General Government, Nec</u>	County	<u>Northampton</u>
Date Application Received	<u>May 2, 2018</u>		
Date Application Accepted	<u>May 7, 2018</u>		
Purpose of Application	<u>Renewal of NPDES permit.</u>		

Internal Review and Recommendations

The applicant is requesting renewal of their individual NPDES MS4 permit to discharge stormwater to the Lehigh River (WWF/MF), Saucon Creek (CWF/MF), tributaries 3360 & 3361 to Saucon Creek (CWF/MF), an unnamed tributary to Saucon Creek (CWF/MF), an unnamed tributary to East Branch Saucon Creek (CWF/MF), Black River (CWF/MF), tributary 3355 to Black River (CWF/MF), an unnamed tributary to Black River (CWF/MF), Polk Valley Run (CWF/MF), and Silver Creek (CWF/MF) in state water plan basin 02-C (Lower Lehigh River). As per the Department's current existing use list, the receiving streams do not have existing use classifications that are more protective than their designated uses.

The Lehigh River, East Branch Saucon Creek, Silver Creek, Saucon Creek and Polk Valley Run are all impaired for siltation within a 5-mile buffer of the urbanized area in Lower Saucon Township. The permittee was required to develop and submit a Pollutant Reduction Plan (PRP) with the permit application describing how 10% of their existing sediment loading to the receiving streams will be removed within five years of the permit effective date (see Appendix E of the permit). The permittee shall also implement Pollutant Control Measures (PCMs) within the storm sewershed of any outfall that discharges to waters impaired from PCBs (the Lehigh River) as described in Appendix C of the permit.

Some proposed BMPs in the township's PRP are labeled as "retrofit" BMPs on the submitted map, but not in the written plan. The final permit cover letter will remind the permittee to subtract existing BMP efficiencies from the final efficiencies to find the net BMP efficiency.

The previously issued permit expired on October 31, 2018 and the application for permit renewal was submitted on time. There are no open violations for this client that would warrant withholding the issuance of the final permit.

Note: None of the identified outfalls discharge directly to stream segments designated as High Quality or Exceptional Value. It's likely that an individual permit was required in the past for the township due to the 2000 urbanized area being adjacent to an unnamed tributary to Cooks Creek, an Exceptional Value stream. The 2010 urbanized area does not include that area. If none of the receiving streams within the township's urbanized area are re-designated as High Quality or Exceptional Value before this permit expires, the township may apply for a general permit for the next permit cycle. It's not beneficial for the township to obtain a

Approve	Deny	Signatures	Date
X		/s/ Brian Burden, E.I.T. / Project Manager	February 7, 2020
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	February 7, 2020

Internal Review and Recommendations

general permit at this time since a.) they will have more time to comply with the Appendix C PCM with an individual permit, and b.) there is no difference in the annual fee amounts for the general and individual MS4 permits.

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.