

Application Type Renewal
Facility Type MS4
MS4 Type Small

**INDIVIDUAL MS4
CHECKLIST**



Application No. PAI136140
APS ID 1078067
Authorization ID 1421780

Applicant and Facility Information

Applicant Name	<u>Conemaugh Township Somerset County</u>	Facility Name	<u>Conemaugh Township Somerset County</u>
Applicant Address	<u>1120 Tire Hill Road Johnstown, PA 15905-7707</u>	Facility Address	<u>1120 Tire Hill Road Johnstown, PA 15905-7707</u>
Municipality	<u>Conemaugh Township Mill Creek (HQ-CWF), Bens Creek (CWF), Unnamed Tributary to Bens Creek (CWF), and Unnamed Tributaries to Stonycreek River (CWF)</u>	County	<u>Somerset</u>
Receiving Water(s)	<u>River (CWF)</u>	Ch. 93 Class.	<u>HQ-CWF and CWF</u>
Date Application Received	<u>December 22, 2022</u>		

Checklist

	<u>Completeness Item</u>	<u>Comments</u>
<input checked="" type="checkbox"/>	1. One original and two copies of complete NOI (3800-PM-BCW0100b).	
<input type="checkbox"/>	2. One original and two copies of complete Waiver Application (3800-PM-BCW0100e) (optional).	N/A
<input checked="" type="checkbox"/>	3. Complete storm sewer system map (existing permittees) (note – new urbanized areas do not require mapping of entire storm sewer collection system).	
<input type="checkbox"/>	4. Topographic map or storm sewer system map (new permittees and existing waivers).	N/A
<input type="checkbox"/>	5. MOU or written agreement for third party MCM implementation (if applicable).	N/A
<input checked="" type="checkbox"/>	6. Stormwater Management Ordinance (municipal applicants seeking renewed coverage only).	Stormwater Management Ordinance enacted December 21, 2022 to be consistent with the 2022 DEP Model Ordinance.
<input checked="" type="checkbox"/>	7. Stormwater Management Ordinance Checklist (3800-PM-BCW0100g) (if applicable).	
<input type="checkbox"/>	8. SOPs (non-municipal applicants seeking renewed coverage only).	N/A
<input type="checkbox"/>	9. Chesapeake Bay PRP (Appendix D) and/or Impaired Waters PRP (Appendix E), where required.	N/A
<input type="checkbox"/>	9a. PRP public participation requirements – the PRP contains a copy of the public notice advertising the PRP, a copy of all	N/A

Approve	Deny	Signatures	Date
X		 Lauren Nolfi / Environmental Engineering Specialist	July 29, 2024
X		 Michael E. Fifth, P.E. / Environmental Engineer Manager	August 1, 2024

	written comments received from the public to the PRP, and a copy of the permittee's record of consideration of all timely comment received in the public comment period.	
<input type="checkbox"/>	9b. PRP contains a map that identifies land uses and/or impervious/pervious surfaces and the storm sewershed boundary(ies) (note – this map may be combined with item #3 for existing permittees).	N/A
<input type="checkbox"/>	9c. PRP contains a section that describes the pollutants of concern.	N/A
<input type="checkbox"/>	9d. PRP contains existing load calculations for pollutants of concern.	N/A
<input type="checkbox"/>	9e. PRP selects BMPs to achieve the minimum required reductions in pollutant loading	N/A
<input type="checkbox"/>	9f. PRP identifies funding mechanisms.	N/A
<input type="checkbox"/>	9g. PRP identifies responsible parties for operation and maintenance (O&M) of BMPs.	N/A
<input type="checkbox"/>	9h. For joint PRPs, a written agreement amongst the parties is attached (if applicable).	N/A
<input type="checkbox"/>	10. TMDL Plan (Appendix F), where required.	N/A
<input type="checkbox"/>	10a. TMDL Plan public participation requirements (see 9a).	N/A
<input type="checkbox"/>	10b. Plan contains a map that identifies land uses and/or impervious/pervious surfaces and the storm sewershed boundary(ies).	N/A
<input type="checkbox"/>	10c. Plan contains describes the pollutants of concern.	N/A
<input type="checkbox"/>	10d. Plan contains existing load calculations.	N/A
<input type="checkbox"/>	10e. Plan identifies wasteload allocations (WLAs).	N/A
<input type="checkbox"/>	10f. Plan contains an analysis of short- and long-term objectives.	N/A
<input type="checkbox"/>	10g. PRP selects BMPs to achieve the minimum required reductions in pollutant loading.	N/A
<input type="checkbox"/>	10h. PRP identifies funding mechanisms.	N/A
<input type="checkbox"/>	10i. PRP identifies responsible parties for O&M of BMPs.	N/A
<input type="checkbox"/>	10j. For joint PRPs, a written agreement amongst the parties is attached (if applicable).	N/A
<input type="checkbox"/>	11. Complete NOI packages for each co-applicant (joint NOIs only). NOTE – Each municipality served by an authority must also submit an NOI.	N/A

Other Comments:

The Department received a late Notice of Intent (NOI) for renewal of coverage of Conemaugh Township under the Individual MS4 Permit on December 22, 2022. Conemaugh Township's previous individual permit was issued on January 16, 2018 and expired on March 31, 2023. The individual permit replaced the township's previous PAG136345 permit, since the MS4 discharges to a special protection water. Conemaugh Township is located in Somerset County and has a population of 6760, per the 2020 US Census. The township has an urbanized area of approximately 1840.5 acres per DEP Land Cover Estimates. 17% of the township's urbanized area is impervious and 83% of the township's urbanized area is pervious.

The renewal submittal included a Stormwater Management Ordinance, enacted December 21, 2022, that is consistent with the 2022 DEP Model Ordinance, an Act 167 Plan approved by DEP in 2005 or later and a Stormwater Management Ordinance Checklist for 2022. The Stormwater Management Ordinance Checklist was also attached to the renewal submittal. The township

is relying on Pennsylvania's Chapter 102 program for erosion and sediment control and post-construction stormwater management requirements.

Conemaugh Township has outfalls discharging to receiving water bodies within two HUC-12 Watersheds: North Fork Bens Creek and Lower Stonycreek River-Conemaugh River. The most downstream outfall to each water body is listed as: Outfall 001 (UNT-SR1-002) to Unnamed Tributary (UNT) to Stonycreek River (CWF), Outfall 002 (UNT-SR2-007) to UNT to Stonycreek River (CWF), Outfall 003 (UNT-SR3-003) to UNT to Stonycreek River (CWF), Outfall 005 (MC-001) to Mill Creek (HQ-CWF), Outfall 006 (BC-001) to Bens Creek (CWF), Outfall 007 (UNT-BC-001) to UNT to Bens Creek (CWF).

Mill Creek and UNT to Bens Creek have no listed impairments. UNT to Stonycreek River is impaired for an unknown impairment, resulting from urban runoff/ storm sewers and organic enrichment and low D.O., resulting from on-site treatment systems. Stonycreek River is impaired for an unknown impairment within the township and is impaired for metals, pH and other habitat alterations 2.9 miles downstream from the township. Bens Creek is impaired for metals, resulting from acid mine drainage. Conemaugh Township is subject to Appendix A requirements.

The MS4 is located in the Kiskiminetas-Conemaugh River TMDL Watershed with wasteload allocations (WLAs) for aluminum, iron, and manganese. Impairments due to metals and/ or acidity associated with Abandoned Mine Drainage (AMD), regardless of whether there is an approved TMDL, are addressed by Appendix A Pollutant Control Measures (PCMs).

During the last permit term, Conemaugh Township submitted annual reports from 2018, 2021 and 2022, but is overdue for submitting their 2017, 2019, 2020, and 2023 annual reports. Conemaugh Township was most recently inspected on December 14, 2023 as a compliance evaluation and an administrative/ file review. The following violations were noted:

1. Failure to submit an Annual MS4 Status Report. The Annual Status Report due September 30, 2023 was not submitted.
2. Failure to comply with a compliance schedule in an NPDES permit. The MS4 Progress Report due September 30, 2023 was not submitted.
3. Failure to review, evaluate, and revise public education program. The last review reported was June 30, 2021.
4. Failure to review and update list of target audiences.
5. Failure to update list of published material. Published MS4 materials need to be reviewed annually as part of the PEOP Plan.
6. Failure to review and revise PIPP annually.
7. Failure to implement IDD&E program and evaluate annually.
8. IDD&E program maps have not been updated and maintained annually.
9. Storm sewer collection system mapping has not been updated and maintained annually.
10. Failure to keep records of outfall observations each time an outfall is screened for five years. Outfall screening has been conducted, but not documented.
11. Failure to submit inspection results and corrective actions in the Annual Status Report. The last Annual Status Report received October 2022 did not include inspection results.
12. Failure to provide educational outreach to target audiences about the program to detect and eliminate illicit discharges. Educational material distribution about the detection and elimination of illicit discharges needs to be included as part of the IDD&E plan.
13. Failure to review and update operation inventory annually.
14. Failure to review and update operations O&M program annually.
15. Training program is not conducted, reviewed, and updated annually.
16. Employee training documentation does not include dates, names of attendees, names of presenters, and topics covered. No training has been documented.

Conemaugh Township received a Notice of Violation (NOV) on January 11, 2024 for the township's failure to comply with a compliance schedule in an NPDES Permit. The NOV requested the submission of an MS4 Annual Report for the reporting period of July 1, 2022 – June 30, 2023, as well as a report on steps being taken to come into compliance with permit requirements. Conemaugh Township submitted an Annual Report on January 24, 2024. On February 26, 2024 Conemaugh Township submitted an annual compliance schedule to serve as corrective actions to achieve compliance with their permit requirements. A copy of the compliance schedule is included below. According to Operations, Conemaugh Township has not yet submitted any completed tasks from their compliance schedule. Conemaugh Township has no open violations.

Conemaugh Township does not have a PRP requirement, based on the MS4 Requirement Table. Since the receiving streams UNT to Stonycreek River and Stonycreek River are impaired from organic enrichment and low D.O., it is imperative that the township prioritize implementation of MCMs 3, 5, and 6 during this permit term.

Draft permit issuance is recommended.

CONEMAUGH TOWNSHIP MS4 ANNUAL COMPLIANCE SCHEDULE

* MS4 Annual Report is due on September 30 each year for the most recent reporting period.

* MS4 Reporting periods begin on July 1 and end on June 30.

REPORTING PERIOD: JULY 1 _____ to JUNE 30 _____

Task #	Task	Due Date	Completion Date
1	Review and revise Appendix H - Employee Training in SWMP	1-Nov	
2	Conduct annual employee training	1-Nov	
3	Review and update Public Education and Outreach Program	1-Dec	
4	Review and update Appendix A - Target Audience List in SWMP	1-Dec	
5	Conduct educational material distribution	1-Jan	
6	Review and update list of published material in Appendix B - Educational Distributions in the SWMP	1-Jan	
7	Review and update Public Involvement and Participation Program	1-Feb	
8	Update Appendix C - Public Comment and Appendix D - Public Involvement in SWMP	1-Feb	
9	Review and update Illicit Discharge Detection and Elimination Program	1-Mar	
10	Review and update Appendix F - MS4 Mapping in SWMP	1-Mar	
11	Annual Fee Submission (If necessary)	1-Apr	
12	Review and update operations inventory	1-Apr	
13	Review and update O&M Manual	1-Apr	
14	Review and update Appendix G - PCSM BMP Inventory in the SWMP	1-Apr	
15	Conduct any required field screenings for the reporting period	1-Jun	
16	Update Appendix E - Field Screening in SWMP when applicable	15-Jun	
17	Review and update Appendix I - AMD Inventory in SWMP	15-Jun	
18	Final review of SWMP and completion of any additional updates as necessary	30-Jun	
19	Submit MS4 Annual Report	30-Sep	

This schedule is based on the Conemaugh Township Stormwater Management Program (SWMP) which should be referenced and updated accordingly when completing the above tasks.