pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PAS803507**
Facility Type	**Storm Water**	APS ID	**337655**
Major / Minor	**Minor**	Authorization ID	**1216745**

NPDES PERMIT FACT SHEET INDIVIDUAL INDUSTRIAL WASTE (IW) AND IW STORMWATER

Applicant and Facility Information

Applicant Name	**Naval Support Activity Mechanicsburg**	Facility Name	**Naval Support Activity Mechanicsburg**
Applicant Address	5450 Carlisle Pike Building 305 Mechanicsburg, PA 17055	Facility Address	5450 Carlisle Pike Mechanicsburg, PA 17055
Applicant Contact	Catherine Mulhearn	Facility Contact	
Applicant Phone	(717) 605-2179	Facility Phone	
Client ID	175192	Site ID	444007
SIC Code	4173,4225,5093	Municipality	Hampden Township
SIC Description	Trans. & Utilities - Bus Terminal And Service Facilities,Trans. & Utilities - General Warehousing And Storage,Wholesale Trade - Scrap And Waste Materials	County	Cumberland
Date Application Received	July 18, 2017	EPA Waived?	Yes
Date Application Accepted	March 29, 2019	If No, Reason	

Purpose of Application: NPDES discharge of stormwater associated with industrial activity.

Summary of Review

This is a renewal for a NPDES individual permit to discharge stormwater associated with industrial activity located in Hampden Township, Cumberland County. Facility activities include general warehousing operations and storage of scrap and waste material. See Figures 1, 1a, and 2 for Site Layout Maps

The facility's SIC codes, 4225 (General Warehousing) and 5093 (Scrap and Waste Material), require an NPDES permit for discharges of stormwater associated with industrial activity. SIC code 4225 makes up 90% of the facility's activities and SIC code 5093 makes up 8% of the activities.

The facility discharges to Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF). Due to the receiving stream's designated use of HQ-CWF, the facility is not eligible for PAG-03 General NPDES Permit coverage and must be covered by an Individual Permit. Based on the facility's SIC codes, the facility would fall under Appendices L and P of the PAG-03 General NPDES Permit.

The facility has 7 outfalls, but two of those outfalls (006 and 007) are not tied to the distribution system and it was determined during the previous permit review that outfalls 006 and 007 did not need to be covered under an industrial stormwater NPDES permit. Therefore, this permit will cover 5 outfalls; Outfalls 001, 002, 003, 004, and 005. Outfalls 001, 002, and 004 would be subject to Appendices L and P due to the outdoor material storage within their drainage areas. Outfalls 003 and 005 would only be subject to Appendix L since there is no outdoor material storage within their drainage areas.

The permittee was previously covered under both an industrial stormwater NPDES permit (PAS803507) and a Municipal Separate Storm Sewer System (MS4) NPDES permit (PAI133516). To avoid being covered under two NPDES permits for

Approve	Deny	Signatures	Date
X		/s/ Jacob S. Rakowsky, EIT / Environmental Engineering Specialist	6/2/2020
X		/s/ Scott M. Arwood, P.E. / Environmental Engineer Manager	6/2/2020

Summary of Review

stormwater within the same drainage areas, it was determined that the permittee's industrial stormwater NPDES permit will be renewed and incorporate any applicable MS4 requirements into Part C of the permit. The MS4 permit will be terminated upon issuance of the industrial stormwater permit's renewal.

Part C permit conditions require semiannual site inspections as well as implementation of BMPs and implementation of the facility PPC plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream.

EPA waiver is in effect.

The PPC plan was last updated in June 2013, but it was noted in the permit application revision received on 3/28/19 that an update to the PPC plan was scheduled for June 2019.

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.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0
Latitude	40º 13' 46.2"	Longitude	-76º 59' 38.09"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF, MF)	Stream Code	10223
NHD Com ID	56404787	RMI	1.5
Drainage Area	0.46 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	3.41	Q_{7-10} Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN, SILTATION, SILTATION		
Source(s) of Impairment	AGRICULTURE, CONSTRUCTION, URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Conodoguinet Creek Watershed
Nearest Downstream Public Water Supply Intake	Steelton Boro Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Boro, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	~23

Drainage Area: 5,314,320 SF, 54% impervious

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Outdoor material storage, warehousing

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: underground vortech unit to mitigate potential sediment, oils, etc.; BMPs at bldgs 402, 505, 409; BMPs planned for bldg 311. See Figures 1, 1a, and 2 for BMP locations.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 13' 46.2"	Longitude	-76º 59' 38.12"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF, MF)	Stream Code	10223
NHD Com ID	56404787	RMI	1.5
Drainage Area	0.46 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	3.41	Q_{7-10} Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN, SILTATION, SILTATION		
Source(s) of Impairment	AGRICULTURE, CONSTRUCTION, URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Conodoguinet Creek Watershed
Nearest Downstream Public Water Supply Intake	Steelton Boro Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Boro, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	~23

Drainage Area: 4,748,040 SF, 52% impervious

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Outdoor material storage, warehousing

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: underground vortech unit to mitigate potential sediment, oils, etc.; BMPs at bldgs 301, 304, 306A, 208, 212S, 210N, 211. See Figures 1, 1a, and 2 for BMP locations.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	003	Design Flow (MGD)	0
Latitude	40º 13' 58.08"	Longitude	-76º 59' 30.46"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF, MF)	Stream Code	10223
NHD Com ID	56404787	RMI	1.25
Drainage Area	0.77 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.865	Q_{7-10} Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN, SILTATION, SILTATION		
Source(s) of Impairment	AGRICULTURE, CONSTRUCTION, URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Conodoguinet Creek Watershed
Nearest Downstream Public Water Supply Intake	Steelton Boro Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Boro, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	~23

Drainage Area: 2,787,840 SF, 57% impervious

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Warehousing

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: BMPs at bldgs 205N, 104S. See Figures 1, 1a, and 2 for BMP locations.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	004	Design Flow (MGD)	0
Latitude	40º 14' 4.56"	Longitude	-76º 59' 31.18"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF, MF)	Stream Code	10223
NHD Com ID	56404787	RMI	1.15
Drainage Area	0.80 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.643	Q_{7-10} Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN, SILTATION, SILTATION		
Source(s) of Impairment	AGRICULTURE, CONSTRUCTION, URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Conodoguinet Creek Watershed
Nearest Downstream Public Water Supply Intake	Steelton Boro Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Boro, Dauphin
PWS RMI	53.0	Distance from Outfall (mi)	~23

Drainage Area: 2,526,480 SF, 52% impervious

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Outdoor wood storage, warehousing

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: BMPs at bldg 3, Army Reserve bldg, and former bldg 15. Planned BMP at bldgs 10/11. See Figures 1, 1a, and 2 for BMP locations.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	005	Design Flow (MGD)	0
Latitude	40º 14' 7.44"	Longitude	-76º 59' 32.33"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary 10223 to Trindle Spring Run (HQ-CWF, MF)	Stream Code	10223
NHD Com ID	56404787	RMI	1.1
Drainage Area	0.95 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.819	Q_{7-10} Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN, SILTATION, SILTATION		
Source(s) of Impairment	AGRICULTURE, CONSTRUCTION, URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Conodoguinet Creek Watershed
Nearest Downstream Public Water Supply Intake	Steelton Boro Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Boro, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	~23

Drainage Area: 3,049,200 SF, 7.6% impervious

Description of Materials / Activities in Drainage Area Exposed to Precipitation: Roadways, day care facility

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater: BMPs near building 19.

Compliance History	
Summary of DMRs:	Available eDMR data can be found in Table 1 below. The permittee had the option to perform annual inspections in lieu of sampling in their previous permit.
Summary of Inspections:	The facility was inspected on 7/8/14 and 4/25/19. No violations were noted. As a result of administrative/file reviews, violations were issued on 4/11/17 for failure to use a process required by DEP for self-monitoring and on 8/24/17 for failure to submit the permit application on time. Both violations have been resolved.

Other Comments: There are no open violations that should affect issuance of the permit.

Proposed Effluent Limitations and Monitoring Requirements

Table 1. Sampling Results, eDMR 1/28/20

	001	002	003	004	005
Total Iron	0.0000001	0.0000001	0.0000001	0.0000001	0.0000001
TKN	1.8	1.4	1.8	1.4	1.8
TSS	31	24	50	9	29

Table 1a. Sampling Results, Renewal Application 6/7/17

	001	002	003	004	005
BOD	ND	ND	ND	ND	2.3
COD	12	8	8	86	**136***
Nitrate-N	0.68	0.72	0.78	0.78	0.94
Nitrite-N	ND	ND	ND	ND	ND
Oil/Grease Hexane Extractable	ND	ND	ND	ND	ND
pH	7.63	7.6	7.43	7.72	7.58
TP	ND	ND	ND	0.25	0.36
TKN	ND	ND	1	2.7	2.7
TN	ND	ND	ND	ND	ND
TSS	ND	ND	5	12	9
Dissolved Iron	ND	ND	ND	ND	ND

*COD results exceeded the proposed benchmark of 120 mg/l for the renewed permit.

Table 2. Previous Permit Monitoring Requirements, Outfalls 001, 002, 003, 004, 005 (January 1, 2013 through December 31, 2017)

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

If the facility were to qualify for a PAG-03, they would fall under Appendix L – Land Transportation and Petroleum Stations and Terminals and Appendix P – Scrap and Waste Recycling Facilities. Outfalls 001, 002, and 004 would be subject to Appendices L and P due to the outdoor material storage within their drainage areas. Outfalls 003 and 005 would only be subject to Appendix L since there is no outdoor material storage within their drainage areas.

Appendix L requires 1/6 month sampling of TSS and Oil and Grease, including benchmarks for TSS and Oil and Grease. Appendix P requires 1/6 month sampling of TSS, Oil and Grease, COD, Total Copper, Total Lead, and Total Zinc, including benchmarks for TSS, Oil and Grease, and COD.
It is likely that a reissued PAG-03 General NPDES Permit in 2021 will require TN and TP monitoring for all permittees within the Chesapeake Bay, with no benchmarks or limits. The facility's MS4 permit would have also included requirements for reduction of TN and TP. Therefore, TN and TP monitoring will be required for the renewed permit.

Table 3. Proposed Monitoring Requirements, Outfalls 001, 002, 004

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Table 4. Proposed Monitoring Requirements, Outfalls 003, 005

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Benchmarks for TSS, Oil and Grease, and COD are included in the renewed permit (typical of PAG-03, Appendix L and Appendix P monitoring requirements).
The requirement to submit an Annual Report is included.
The requirement for routine inspections on a semiannual basis is included.
The option to perform annual inspections in lieu of sampling is no longer included.

Antidegradation (93.4):

The applicant is not proposing a new or increased discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 4 (Anti Degradation Module) was not attached to the application.

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Discharges are to an HQ-CWF stream. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of Unnamed Tributary 10223 to Trindle Spring Run is HQ-CWF, MF.

Proposed Part C Special Conditions

I. STORMWATER OUTFALLS AND AUTHORIZED NON-STORMWATER DISCHARGES

A. The permittee is authorized to discharge non-polluting stormwater from its site through the following outfalls:

Outfall No.	Area Drained (ft^2)	Latitude	Longitude	Description
001	5,314,320	40º 13' 46.2"	-76º 59' 38.09"	Outdoor material storage, Warehousing
002	4,748,040	40º 13' 46.2"	-76º 59' 38.12"	Outdoor material storage, Warehousing
003	2,787,840	40º 13' 58.08"	-76º 59' 30.46"	Warehousing
004	2,526,480	40º 14' 4.56"	-76º 59' 31.18"	Outdoor wood storage, Warehousing
005	3,049,200	40º 14' 7.44"	-76º 59' 32.33"	Roadways, Day care facility

Monitoring requirements and effluent limitations for these outfalls are specified in Part A of this permit, if applicable.

B. The permittee is authorized to discharge the following non-stormwater discharges under this permit:

- Discharges from emergency/unplanned fire-fighting activities;
- Potable water, including water line flushings and fire hydrant flushings, that do not contain measurable concentrations of Total Residual Chlorine (TRC);
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors (if treatment through an oil/water separator is provided) and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape water if such water does not contain pesticides, herbicides or fertilizers;
- Pavement wash waters where no detergents or hazardous cleaning products are used, and the wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities, or any other toxic or hazardous materials;
- Routine external building washdown / power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols);
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of a facility, but not intentional discharges from the cooling tower.

II. BEST MANAGEMENT PRACTICES (BMPs)

The permittee shall implement and, as necessary, maintain the following BMPs to remain in compliance with this permit.

A. Pollution Prevention and Exposure Minimization.

The permittee shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating industrial materials and activities inside or protecting them with storm resistant coverings wherever feasible. The permittee shall implement and maintain the following measures, at a minimum:

1. Use grading, berming or curbing to prevent runoff of polluted stormwater and divert run-on away from areas that contain polluted stormwater.

2. Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge to surface waters.

3. Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants

to surface waters.

4. Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents to prevent the release of pollutants to the environment.

5. Use spill/overflow protection equipment.

6. Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray.

7. Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.

8. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids, ensure that discharges have a control (e.g., secondary containment, treatment). This permit does not authorize dry weather discharges from dumpsters or roll off boxes.

9. Minimize contamination of stormwater runoff from fueling areas by implementing the following BMPs where determined to be feasible: cover fueling areas; install oil/water separators or oil and grease traps in fueling area storm drains; use berms to prevent run-on to and runoff from fueling areas; use spill/overflow protection and cleanup equipment; use dry cleanup methods; and/or treat and/or recycle collected stormwater runoff.

10. Train employees routinely (no less than annually) on pollution prevention practices as contained in the PPC Plan.

B. Good Housekeeping.

The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including the routine implementation of the following measures, at a minimum:

1. Implement a routine cleaning and maintenance program for all impervious areas of the facility where particulate matter, dust or debris may accumulate to minimize the discharge of pollutants in stormwater. The cleaning and maintenance program must encompass, as appropriate, areas where material loading and unloading, storage, handling and processing occur.

2. Store materials in appropriate containers.

3. Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.

4. Eliminate floor drain connections to storm sewers.

5. Use drip pans, drain boards, and drying racks to direct drips back into a fluid holding tank for reuse. Drain fluids from all equipment and parts prior to disposal. Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.

6. Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).

7. Prohibit the practice of hosing down an area where the practice would result in the discharge of pollutants to a municipal or other storm water collection system that conveys pollutants off-site without proper treatment.

C. Erosion and Sediment Controls.

1. The permittee shall minimize erosion and pollutant discharges by stabilizing exposed soils and placing flow velocity dissipation devices at discharge locations to minimize channel and stream bank erosion and scour in the immediate vicinity of stormwater outfalls.

2. The permittee shall conduct all earth disturbance activities and, when applicable, shall maintain all post-

construction stormwater management (PCSM) BMPs in accordance with 25 Pa. Code Chapter 102.

3. The permittee may not utilize polymers or other chemicals to treat stormwater unless written permission is obtained from DEP.

D. Spill Prevention and Responses.

The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part C IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum:

1. Maintain an organized inventory of materials on-site. Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.

2. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.

3. Develop and implement employee and contractor training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. The permittee shall conduct periodic training, no less than annually, and document the training on the Annual Report required by Part A III.C.1.

4. Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made.

5. Notify appropriate facility personnel when a leak, spill, or other release occurs.

6. To the extent possible, eliminate or reduce the number and amount of hazardous materials and waste by substituting non-hazardous or less hazardous materials of equal function, as determined by the permittee.

7. Clean up leaks, drips, and other spills without using large amounts of water or liquid cleaners. Use absorbents for dry cleanup whenever possible.

When a leak, spill or other release occurs during a 24-hour period that contains a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR Parts 110, 117 or 302, the permittee shall, in addition to the notification requirements contained in Part A III.C.3 of this permit, notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Parts 110, 117, and 302 as soon as the permittee becomes aware of the discharge.

E. Sector- and Site-Specific BMPs.

1. Vehicle and Equipment Storage Areas.

Minimize the potential for stormwater exposure to leaky or leak-prone vehicles/equipment awaiting maintenance through implementation of control measures including but not limited to the following: use drip pans under vehicles/equipment; store vehicles and equipment indoors; install berms or dikes; use absorbents; roof or cover storage areas; and clean pavement surfaces to remove oil and grease.

2. Material Storage Areas.

Maintain all material storage vessels (e.g., for used oil/oil filters, spent solvents, paint wastes, hydraulic fluids) to prevent contamination of stormwater and plainly label them (e.g., "Used Oil," "Spent Solvents"). To minimize discharges of pollutants in stormwater from material storage areas, implement control measures including but not limited to the following: store materials indoors; install berms/dikes around material storage areas; minimize runoff of stormwater to the areas; use dry cleanup methods; and treat and/or recycle collected stormwater runoff.

3. Vehicle and Equipment Cleaning and Maintenance Areas.

Minimize contamination of stormwater runoff from all areas used for vehicle/equipment cleaning through implementation of control measures including but not limited to the following: perform all cleaning operations indoors; use dry cleanup methods; ensure that all wash water drains to a proper collection system (i.e., not the stormwater drainage system); treat and/or recycle collected wash water; or other equivalent measures.

4. Inbound Recyclable and Waste Material Control Program.

   Minimize the chance of accepting materials that could be significant sources of pollutants by conducting inspections of inbound recyclables and waste materials and through implementation of control measures including but not limited to the following: provide information and education to suppliers of scrap and recyclable waste materials on draining and properly disposing of residual fluids (e.g., from vehicles and equipment engines, radiators and transmissions, oil filled transformers, and individual containers or drums) and removal of mercury switches from vehicles before delivery to the facility; establish procedures to minimize the potential of any residual fluids from coming into contact with precipitation or runoff; establish procedures for accepting scrap lead-acid batteries; provide training targeted for those personnel engaged in the inspection and acceptance of inbound recyclable materials; and establish procedures to ensure that liquid wastes, including used oil, are stored in materially compatible and non-leaking containers and are disposed of or recycled in accordance with RCRA (42 U.S.C. §§ 6901-6992k).

5. Scrap and Waste Material Stockpiles and Storage (Outdoor).

   Minimize contact of stormwater runoff with stockpiled materials, processed materials, and non-recyclable wastes through implementation of control measures including but not limited to the following: permanent or semi-permanent covers; sediment traps, vegetated swales and strips, catch basin filters, and sand filters to facilitate settling or filtering of pollutants; dikes, berms, containment trenches, culverts, and surface grading to divert runoff from storage areas; silt fencing; and oil and water separators, sumps, and dry absorbents for areas where potential sources of residual fluids are stockpiled (e.g., automobile engine storage areas).

6. Stockpiling of Turnings Exposed to Cutting Fluids (Outdoor Storage).

   Minimize contact of surface runoff with residual cutting fluids by storing all turnings exposed to cutting fluids under some form of permanent or semi-permanent cover, or establishing dedicated containment areas for all turnings that have been exposed to cutting fluids. Any containment areas must be constructed of concrete, asphalt, or other equivalent types of impermeable material and include a barrier (e.g., berms, curbing, elevated pads) to prevent contact with stormwater run-on. Stormwater runoff from these areas can be discharged, provided that any runoff is first collected and treated by an oil/water separator or its equivalent. The permittee must regularly maintain the oil/water separator (or its equivalent) and properly dispose of or recycle collected residual fluids.

7. Scrap and Waste Material Stockpiles and Storage (Covered or Indoor Storage).

   Minimize contact of residual liquids and particulate matter from materials stored indoors or under cover with surface runoff through implementation of control measures including but not limited to the following: good housekeeping measures, including the use of dry absorbents or wet vacuuming to contain, dispose of, or recycle residual liquids originating from recyclable containers, and mercury spill kits for spills from storage of mercury switches; not allowing wash water from tipping floors or other processing areas to discharge to the storm sewer system; and disconnecting or sealing off all floor drains connected to the storm sewer system.

8. Scrap and Recyclable Waste Processing Areas.

   Minimize surface runoff from coming in contact with scrap processing equipment. Pay attention to operations that generate visible amounts of particulate residue (e.g., shredding) to minimize the contact of accumulated particulate matter and residual fluids with runoff (i.e., through good housekeeping, preventive maintenance). To minimize discharges of pollutants in stormwater from scrap and recyclable waste processing areas, implement control measures including but not limited to the following: inspect equipment at least once per month for spills or leaks and malfunctioning, worn, or corroded parts or equipment; establish a preventive maintenance program for processing equipment; use dry-absorbents or other cleanup practices to collect and dispose of or recycle spilled or leaking fluids or use mercury spill kits for spills from storage of mercury switches; install protection devices such as low-level alarms or equivalent or secondary containment on unattended hydraulic reservoirs over 150 gallons in capacity; implement containment or diversion structures

such as dikes, berms, culverts, trenches, elevated concrete pads, and grading to minimize contact of stormwater runoff with outdoor processing equipment or stored materials; use oil/water separators or sumps; install permanent or semi-permanent covers in processing areas where there are residual fluids and grease; and use retention or detention ponds or basins, sediment traps, vegetated swales or strips, and/or catch basin filters or sand filters for pollutant settling and filtration.

9. Scrap Lead-Acid Battery Program.

   To minimize the discharge of pollutants in stormwater from lead-acid batteries, properly handle, store, and dispose of scrap lead-acid batteries, and implement control measures including but not limited to the following: segregate scrap lead-acid batteries from other scrap materials; proper handling, storing, and disposing of cracked or broken batteries; collect and dispose leaking lead-acid battery fluid; minimize or eliminate exposure of scrap lead-acid batteries to precipitation or runoff; and provide employee training for the management of scrap batteries.

10. Spill Prevention and Response Procedures.

    Install alarms and/or pump shutoff systems on outdoor equipment with hydraulic reservoirs exceeding 150 gallons in the event of a line break. Alternatively, a secondary containment system capable of holding the entire contents of the reservoir plus room for precipitation can be used. Use a mercury spill kit for any release of mercury from switches, anti-lock brake systems, and switch storage areas.

11. Supplier Notification Program.

    As appropriate, notify major suppliers which scrap materials will not be accepted at the facility or will be accepted only under certain conditions.

12. Deicing Materials Surface and Cover.

    a. The permittee shall store salt stockpiles and conduct loading/unloading activities on a synthetic, impermeable surface (i.e., $< 10^{-7}$ cm/sec).

    b. If stockpiles are not covered under permanent, structural cover, stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polyurethane, polypropylene or hypalon with sufficient strength to prevent tearing. When loading and unloading is not being done, the entire stockpile must be covered at all times.

13. Deicing Material Management.

    a. Remove covering at the working face just high enough to load out the day's shipment. This will minimize moisture absorption and secure the cover if wind direction shifts toward the working face.

    b. Maintain the working face perpendicular to the long axis of the pile by loading alternately left/right and right/left.

    c. Avoid creating a horseshoe-shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

    d. Maintain adequate cover at the lower edge or toe of the working face to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

    e. Establish and maintain the working face at the downwind end of the stockpile whenever operationally feasible.

    f. Clean up material spills from loading/unloading areas at the end of the work day.

14. Stormwater Management

    a. If stormwater collection ponds or basins are installed and utilized, such ponds shall contain a synthetic liner and be managed to limit discharges to only those times where surface water flows are elevated.

    The permittee shall recycle collected stormwater that may have come into contact with salt materials when determined by the permittee to be feasible.

III. ROUTINE INSPECTIONS

A. The permittee shall visually inspect the following areas and BMPs on a semiannual basis (calendar periods), at a minimum:

1. Areas where industrial materials or activities are exposed to stormwater.

2. Areas identified in the PPC Plan as potential pollutant sources.

3. Areas where spills or leaks have occurred in the past three years.

4. Stormwater outfalls and locations where authorized non-stormwater discharges may commingle.

5. Physical BMPs used to comply with this permit.

At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

B. The permittee shall evaluate and document the following conditions, at a minimum, in the Annual Report required by Part A III.C.1 through required inspections:

1. Raw materials, products or wastes that may have or could come into contact with stormwater.

2. Leaks or spills from equipment, drums, tanks and other containers.

3. Off-site tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.

4. Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas.

5. Control measures or BMPs needing replacement, maintenance or repair.

6. The presence of authorized non-stormwater discharges that were not identified in the permit application and non-stormwater discharges not authorized by this permit.

IV. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

A. The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code § 91.34 following the guidance contained in DEP's "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (DEP ID 400-2200-001), its NPDES-specific addendum and the minimum requirements below.

1. The PPC Plan must identify all potential sources of pollutants that may reasonably be expected to affect the quality of stormwater discharges from the facility.

2. The PPC Plan must describe preventative measures and BMPs that will be implemented to reduce or eliminate pollutants from coming into contact with stormwater resulting from routine site activities and spills.

3. The PPC Plan must address actions that will be taken in response to on-site spills or other pollution incidents.

4. The PPC Plan must identify areas which, due to topography or other factors, have a high potential for soil erosion, and identify measures to limit erosion. Where necessary, erosion and sediment control measures

must be developed and implemented in accordance with 25 Pa. Code Chapter 102 and DEP's "Erosion and Sediment Pollution Control Manual" (DEP ID 363-2134-008).

5. The PPC Plan must address security measures to prevent accidental or intentional entry which could result in an unintentional discharge of pollutants.

6. The PPC Plan must include a plan for training employees and contractors on pollution prevention, BMPs, and emergency response measures. This training must be conducted in accordance with Part C II.D.3.

7. If the facility is subject to SARA Title III, Section 313, the PPC Plan must identify releases of "Water Priority Chemicals" within the previous three years. Water Priority Chemicals are those identified in EPA's "Guidance for the Determination of Appropriate Methods for the Detection of Section 313 Water Priority Chemicals" (EPA 833-B-94-001, April 1994). The Plan must include an evaluation of all activities that may result in the stormwater discharge of Water Priority Chemicals.

8. Spill Prevention Control and Countermeasure (SPCC) plans may be used to meet the requirements of this section if the minimum requirements are addressed.

B. The permittee shall review and if necessary update the PPC Plan on an annual basis, at a minimum, and when one or more of the following occur:

1. Applicable DEP or federal regulations are revised, or this permit is revised.

2. The PPC Plan fails in an emergency.

3. The facility's design, industrial process, operation, maintenance, or other circumstances change in a manner that materially increases the potential for fires, explosions or releases of toxic or hazardous constituents; or which changes the response necessary in an emergency.

4. The list of emergency coordinators or equipment changes.

5. When notified in writing by DEP.

The permittee shall maintain all PPC Plan updates on-site, make the updates available to DEP upon request, and document the updates in Annual Reports.

V. STORMWATER MONITORING REQUIREMENTS

A. The permittee shall conduct monitoring of its stormwater discharges at the representative outfalls identified in Part A of this permit. The permittee shall document stormwater sampling event information and no exposure conditions for each calendar year on the Annual Report required by Part A III.C.1.

B. The permittee shall, upon written notice from DEP, install inlets, pipes, and/or other structures or devices that are considered necessary in order to conduct representative stormwater sampling, in accordance with a schedule provided by DEP.

C. The permittee shall collect all samples from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. The 72-hour storm interval is waived when the preceding storm did not yield a measurable discharge, or if the permittee is able to document that a less than 72-hour interval is representative for local storm events during the sample period.

D. The permittee shall collect all grab samples within the first 30 minutes of a discharge, unless the permittee determines that this is not possible, in which case grab samples must be collected as soon as possible after the first 30 minutes of a discharge. The permittee shall explain why samples could not be collected within the first 30 minutes of any discharge on the Annual Report required by Part A III.C.1.

E. The permittee shall collect stormwater samples at times when commingling with non-stormwater discharges is not occurring or at locations prior to the commingling of non-stormwater discharges.

F. Stormwater Benchmark Values.

1. A benchmark value is the concentration of a pollutant in stormwater discharges that serves as a threshold for the determination of whether existing site BMPs are effective in controlling stormwater pollution. In the event that stormwater discharge concentrations for a parameter exceeds the benchmark value(s) identified below at the same outfall for two or more consecutive monitoring periods, the permittee shall develop a corrective action plan to reduce the concentrations of the parameters in stormwater discharges.

Parameter	Benchmark Value (mg/L)
Total Suspended Solids	100
Oil and Grease	30
Chemical Oxygen Demand	120

2. The permittee shall submit the corrective action plan to DEP within 90 days of the end of the monitoring period triggering the need for the plan, and shall implement the plan immediately upon submission or at a later time if authorized by DEP in writing. The permittee shall, in developing the plan, evaluate alternatives to reduce stormwater concentrations and select one or more BMPs or control measures for implementation, unless the permittee can demonstrate in the plan that (1) the exceedances are solely attributable to natural background sources; (2) no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice; or (3) further pollutant reductions are not necessary to prevent stormwater discharges from causing or contributing to an exceedance of applicable water quality standards.

VI. OTHER REQUIREMENTS

A. The approval herein given is specifically made contingent upon the permittee acquiring all necessary property rights by easement or otherwise, providing for the satisfactory construction, operation, maintenance or replacement of all structures associated with the herein approved discharge in, along, or across private property, with full rights of ingress, egress and regress.

B. Collected screenings, slurries, sludges, and other solids shall be handled, recycled and/or disposed of in compliance with the Solid Waste Management Act (35 P.S. §§ 6018.101 – 6018.1003), 25 Pa. Code Chapters 287, 288, 289, 291, 295, 297, and 299 (relating to requirements for landfilling, impoundments, land application, composting, processing, and storage of residual waste), Chapters 261a, 262a, 263a, and 270a (related to identification of hazardous waste, requirements for generators and transporters, and hazardous waste, requirements for generators and transporters, and hazardous waste permit programs), federal regulation 40 CFR Part 257, The Clean Streams Law, and the Federal Clean Water Act and its amendments. Screenings collected at intake structures shall be collected and managed and not be returned to the receiving waters.

The permittee is responsible to obtain or assure that contracted agents have all necessary permits and approvals for the handling, storage, transport and disposal of solid waste materials generated as a result of wastewater and stormwater treatment.

VII. STORMWATER MANAGEMENT PROGRAM (SWMP)

A. The permittee must develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act and Pennsylvania Clean Streams Law, as described in paragraph B, below. There are six Minimum Control Measures (MCMs) that comprise the SWMP. Specific BMPs are identified under each MCM. The permittee shall demonstrate compliance with the SWMP through the submission of Annual MS4 Status Reports due by May 1 each year using DEP's Annual Report template (3800-FM-BCW0491), attached to this permit.

B. Where samples are collected and analyzed or measurements are taken under this SWMP, the permittee shall assure:

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(1))

2. Records of monitoring information shall include (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(3)):

a. The date, exact place, and time of sampling or measurements.
b. The individual(s) who performed the sampling or measurements.
c. The date(s) analyses were performed.
d. The individual(s) who performed the analyses.
e. The analytical techniques or methods used.
f. The results of such analysis.

3. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless another method is required under 40 CFR Subchapters N or O. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(4))

C. Records Retention – All records of monitoring activities and results and copies of all plans and reports required by this SWMP shall be retained by the permittee for at least 5 years from the date of the sample measurement or report. Such records must be submitted to DEP upon request or as required for annual reports. The permittee must make records available to the public at reasonable times during regular business hours. (25 Pa. Code § 92a.3(c), 40 CFR §§ 122.34(g)(2) and 122.41(j)(2))

D. Minimum Control Measures (MCMs)

1. **MCM #1**: Public Education and Outreach on Stormwater Impacts. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(1))

The permittee shall implement a public education program to distribute educational materials to the served population or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

a. **BMP #1**: Develop, implement and maintain a written Public Education and Outreach Program.

(1) If not already existing, a written Public Education and Outreach Program (PEOP) shall be developed and implemented within one year following issuance of this permit, and shall be re-evaluated each year thereafter and revised as needed.

The permittee's PEOP shall be designed to achieve measurable improvements in the target audience's understanding of the causes and impacts of stormwater pollution and the steps they can take to prevent it.

b. **BMP #2**: Develop and maintain lists of target audience groups that are present within the areas served by the permittee's MS4. The target audiences shall include employees, visitors, contractors, and other relevant groups.

(1) If not already existing, the lists shall be developed within one year following issuance of this permit, and reviewed and updated as necessary every year thereafter.

c. **BMP #3**: The permittee shall annually publish at least one issue of a newsletter, a pamphlet, a flyer, or a website that includes general stormwater educational information, a description of the permittee's SWMP, and/or information about the permittee's stormwater management activities. The list of publications and the content of the publications must be reviewed and updated at least once during each year of permit coverage. Publications should include a list of references (or links) to refer the reader to additional information (e.g., DEP and EPA stormwater websites, and any other sources that will be helpful to readers). The permittee must implement at least one of the following alternatives:

- Publish and distribute in printed form a newsletter, a pamphlet or a flyer containing information consistent with this BMP.

- Publish educational and informational items including links to DEP's and EPA's stormwater websites on the permittee's website.

(1) The list of items published and the content in these items shall be reviewed, updated, and maintained annually.

The permittee's publications shall contain stormwater educational information that addresses one or more of the six MCMs.

d. **BMP #4**: Distribute stormwater educational materials and/or information to the target audiences using a variety of distribution methods, including but not limited to: displays, posters, signs, pamphlets, booklets, brochures, emails, presentations, conferences, meetings, fact sheets, giveaways, and storm drain stenciling.

All permittees shall select and utilize at least two distribution methods annually. These are in addition to BMP #3, above.

2. **MCM #2**: Public Involvement / Participation. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(2))

The permittee shall comply with applicable state and local public notice requirements when implementing a public involvement / participation program.

a. **BMP #1**: Develop, implement and maintain a written Public Involvement and Participation Program (PIPP) which describes various types of possible participation activities and describes methods of encouraging the public's involvement and of soliciting the served population's input.

The PIPP shall be developed and implemented following issuance of this permit. All permittees shall reevaluate the PIPP annually and make revisions as necessary.

The PIPP shall include, at a minimum:

(1) Opportunities for the served population to participate in the decision-making processes associated with the development, implementation, and update of programs and activities related to this permit.

(2) Methods of routine communication to groups such as watershed associations, environmental advisory committees, and other environmental organizations that operate within proximity to the permittee's MS4s or surface waters receiving the permittee's discharges.

(3) Making Annual MS4 Status Reports available for review by members of the served population.

b. **BMP #2**: The permittee shall solicit input on the following documents prior to adoption or submission to DEP:

- Standard Operating Procedures (SOPs); and
- Green infrastructure or pollutant reduction plans, including modifications thereto.

(1) For SOPs, the permittee shall provide notice to the served population; provide opportunities for comment; document and evaluate the comments; and document the permittee's responses to the comments prior to finalizing the documents. The permittee shall provide this documentation to DEP upon request.

c. **BMP #3**: Regularly solicit involvement and participation from the target audience groups using available distribution and outreach methods. This shall include an effort to solicit reporting of suspected illicit discharges. Assist the served population in their efforts to help implement the SWMP.

(1) The permittee shall solicit involvement and participation from target audience groups on the implementation of the SWMP. The solicitation can take the form of meetings, events, or other forums. The target audience shall be given notice in advance of each event. During the events, the permittee should present a summary of progress, activities, and accomplishments with implementation of the SWMP, and the permittee should provide opportunities for feedback and input. The presentation can be made at specific MS4 events or during any other event.

(2) The permittee shall document and report instances of cooperation and participation in MS4 activities; presentations the permittee made to local watershed organizations and conservation organizations; and similar instances of participation or coordination with organizations in the community.

(3) The permittee shall also document and report activities in which members of the served population assisted or participated in the meetings and in the implementation of the SWMP, including education activities or organized implementation efforts such as cleanups, monitoring, storm drain stenciling, or others.

3. **MCM #3**: Illicit Discharge Detection and Elimination (IDD&E). (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(3))

The permittee shall develop, implement and enforce a program to detect and eliminate illicit discharges into the permittee's MS4.

a. **BMP #1**: The permittee shall develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the MS4. The program shall include the following:

- Procedures for identifying priority areas. These are areas with a higher likelihood of illicit discharges, illicit connections or illegal dumping. Priority areas may include areas with older infrastructure, a concentration of high-risk activities, or past history of water pollution problems.

- Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.

- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a MS4 outfall.

- Procedures for eliminating an illicit discharge.

- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.

- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.

- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.

- Procedures for addressing information or complaints received from the public.

(1) If not already existing, the IDD&E program shall be developed during the first year following issuance of this permit and shall be implemented and evaluated each year thereafter.

b. **BMP #2**: The permittee shall develop and maintain map(s) that show permittee and urbanized area boundaries, the location of all outfalls and, if applicable, observation points, and the locations and names of all surface waters that receive discharges from those outfalls. Outfalls and observation points shall be numbered on the map(s).

(1) If not already done, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report.

(2) The map(s) shall be updated and maintained as necessary during each year of coverage under this permit.

c. **BMP #3**: In conjunction with the map(s) created under BMP #2 (either on the same map or on a different map), the permittee shall develop and maintain map(s) that show the entire storm sewer collection system within the permittee's jurisdiction that are owned or operated by the permittee (including roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system), including privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components.

(1) If not already done, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report.

(2) The map(s) shall be updated and maintained as necessary during each year of coverage under this permit.

d. **BMP #4**: The permittee shall conduct dry weather screenings of its MS4 outfalls and observation points to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the served population, public, or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take corrective action as necessary and possible. The permittee shall immediately report to DEP illicit discharges that would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, in accordance with Part A III.C.3 of this permit. An observation point must be established by the permittee at a location upstream of any discharge of stormwater into storm sewers owned or operated by an adjoining municipality.

(1) Each of the identified MS4 outfalls and observation points shall be screened during dry weather at least once during the 5-year period following issuance of this permit. For areas where past problems have been reported or known sources of dry weather flows occur on a continual basis, outfalls shall be screened annually during each year of permit coverage.

(2) If a discharge is observed from any outfall during dry weather screenings, the discharge shall be inspected for color, odor, floating solids, scum, sheen, and substances that result in observed deposits in the surface waters. In addition, the discharge cannot contain substances that result in deposits in the receiving water or produce an observable change in the color, odor or turbidity of the receiving water.

If the discharge exhibits any of the above characteristics, or contains any other pollutants or causes an observed change in the surface waters, the permittee shall sample the discharge(s) for field and/or laboratory analysis of one or more common IDD&E parameters in order to determine if the dry weather flow is illicit. Possible parameters include, but are not limited to: pH, Conductivity, Fecal Coliform bacteria, Heavy Metals, Chemical Oxygen Demand (COD), 5-day Biochemical Oxygen Demand (BOD5), Total Suspended Solids (TSS), Total Dissolved Solids (TDS), Oil and Grease, Total Residual Chlorine (TRC) and Ammonia-Nitrogen. Proper quality assurance and quality control procedures shall be followed when collecting, transporting or analyzing water samples. The permittee shall retain sample results with the inspection report in accordance with Part C VII.B&C of this permit.

(3) Each time an outfall is screened, the permittee shall record outfall observations, regardless of the presence of dry weather flow. All outfall inspections shall be documented on the MS4 Outfall Field Screening Report form (3800-FM-BCW0521), or equivalent. The report must be signed by the inspector and be maintained by the permittee in accordance with Part C VII.C of this permit. If an outfall flow is determined by the permittee to be illicit, the actions taken to identify and eliminate the illicit flow shall also be documented.

(4) The permittee shall summarize the results of outfall inspections and actions taken to remove or correct illicit discharges in Annual MS4 Status Reports.

(5) If the permittee determines that an outfall cannot be accessed due to safety or other reasons, the permittee shall establish an “observation point” at an appropriate location prior to the outfall where outfall field screening shall be performed. If observation points are established by the permittee, such points shall be identified on the map required under BMP #2 of this section.

(6) Permittees must ensure that outfalls are properly maintained in accordance with Part C VII.D.6.b of this Permit.

e. **BMP #5**: Enact a Stormwater Management SOP to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the MS4.

(1) Notice must be provided to DEP of the approval of any waiver or variance by the permittee that allows an exception to non-stormwater discharge provisions of an SOP. This notice shall be submitted in the next Annual MS4 Status Report following approval of the waiver or variance.

f. **BMP #6**: Provide educational outreach to the target audiences about the program to detect and eliminate illicit discharges.

(1) During each year of permit coverage, appropriate educational information concerning illicit discharges shall be distributed to the target audiences using methods outlined under MCM #1. The permittee shall establish and promote a stormwater pollution reporting mechanism (e.g., a complaint line with message recording) by the end of the first year of Permit coverage for the public to use to notify the permittee of illicit discharges, illegal dumping or outfall pollution. The permittee shall respond to all complaints in a timely and appropriate manner. The permittee shall document all responses, including the action taken, the time required to take the action, and whether the complaint was resolved successfully.

(2) Educational outreach may include: distribution of brochures and guidance for target audiences including schools; programs to encourage and facilitate public reporting of illicit discharges; organizing volunteers to locate and visually inspect outfalls and to stencil storm drains; and implement and encourage recycling programs for common wastes such as motor oil, antifreeze and pesticides.

4. **MCM #4**: Construction Site Stormwater Runoff Control. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(4))

The permittee shall implement the BMPs identified below.

a. **BMP #1**: The permittee may not issue a final approval to those proposing or conducting earth disturbance activities requiring an NPDES permit unless the party proposing the earth disturbance has valid NPDES Permit coverage (i.e., not expired) under 25 Pa. Code Chapter 102.

b. **BMP #2**: Enact, implement and enforce an SOP to require the implementation and maintenance of E&S control BMPs, including sanctions for non-compliance, as applicable.

(1) Permittee shall develop, implement and enforce an SOP to require the implementation and maintenance of E&S control BMPs by the first Annual MS4 Status Report following issuance of this permit.

5. **MCM #5**: Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(5))

The permittee shall implement the BMPs identified below.

a. **BMP #1**: Enact, implement and enforce an SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

(1) Permittee shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by the first Annual MS4 Status Report following issuance of this permit.

b. **BMP #2**: Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new development and redevelopment. Measures should also be included to encourage retrofitting LID into existing development. Guidance on implementing LID practices may be found on DEP's MS4 website, www.dep.pa.gov/MS4.

c. **BMP #3**: Ensure adequate O&M of all post-construction stormwater management BMPs that have been installed at development or redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale.

An inventory of PCSM BMPs shall be developed by the end of the first year of Permit coverage and shall be continually updated during the term of coverage under the Permit as development projects are reviewed, approved, and constructed. The permittee shall update and maintain its inventory during the

term of coverage under the Permit. The permittee must track the following information in its PCSM BMP inventory:

- All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003.
- The exact location of the PCSM BMP (e.g., latitude and longitude, with street address).
- Information (e.g., name, address, phone number(s)) for BMP owners and entities responsible for BMP O&M, if different from BMP owners.
- The type of BMP and the year it was installed.
- Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources.
- The actual inspection/maintenance activities conducted for each BMP.
- An assessment by the permittee if proper O&M has occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.

6. **MCM #6**: Pollution Prevention / Good Housekeeping. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(6))

The permittee must develop and implement an O&M program that includes a training component and has the ultimate goal of preventing and reducing pollutant runoff from operations, facilities and activities under the control of the permittee (collectively, "operations"). The program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

a. **BMP #1**: Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the MS4. This includes activities conducted by contractors for the permittee. Activities may include the following: street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn/grounds care; general storm sewer system inspections and maintenance/repairs; park and open space maintenance; building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures. Facilities can include streets; roads; highways; parking lots and other large paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances (open and closed pipe); riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).

(1) If not already existing, permittee shall create an inventory of all operations and land uses that may contribute to pollution in stormwater runoff within areas of operations that discharge to the MS4 by the end of the first year of coverage under this permit, and review and update the inventory annually thereafter.

b. **BMP #2**: Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the MS4. The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following:

- Management practices, policies, and procedures shall be developed and implemented to reduce or prevent the discharge of pollutants to the MS4. The permittee shall consider eliminating maintenance area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.

- Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the MS4.

- Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, salt / sand (anti-skid) storage locations and snow disposal areas. Controls for solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety must be consistent with the BMPs in Part C.II.E.

- Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.

(1) If not already existing, permittee shall develop and implement a written O&M program by the end of the first year of coverage under this permit and review and update the program each year thereafter.

c. **BMP #3**: Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., maintenance staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance and repair activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee's overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

(1) If not already existing, permittee shall develop and implement a training program that identifies the training topics that will be covered and what training methods and materials will be used by the end of the first year of coverage under this permit.

(2) Permittee must review and update the training program each year of permit coverage, as necessary.

(3) Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).

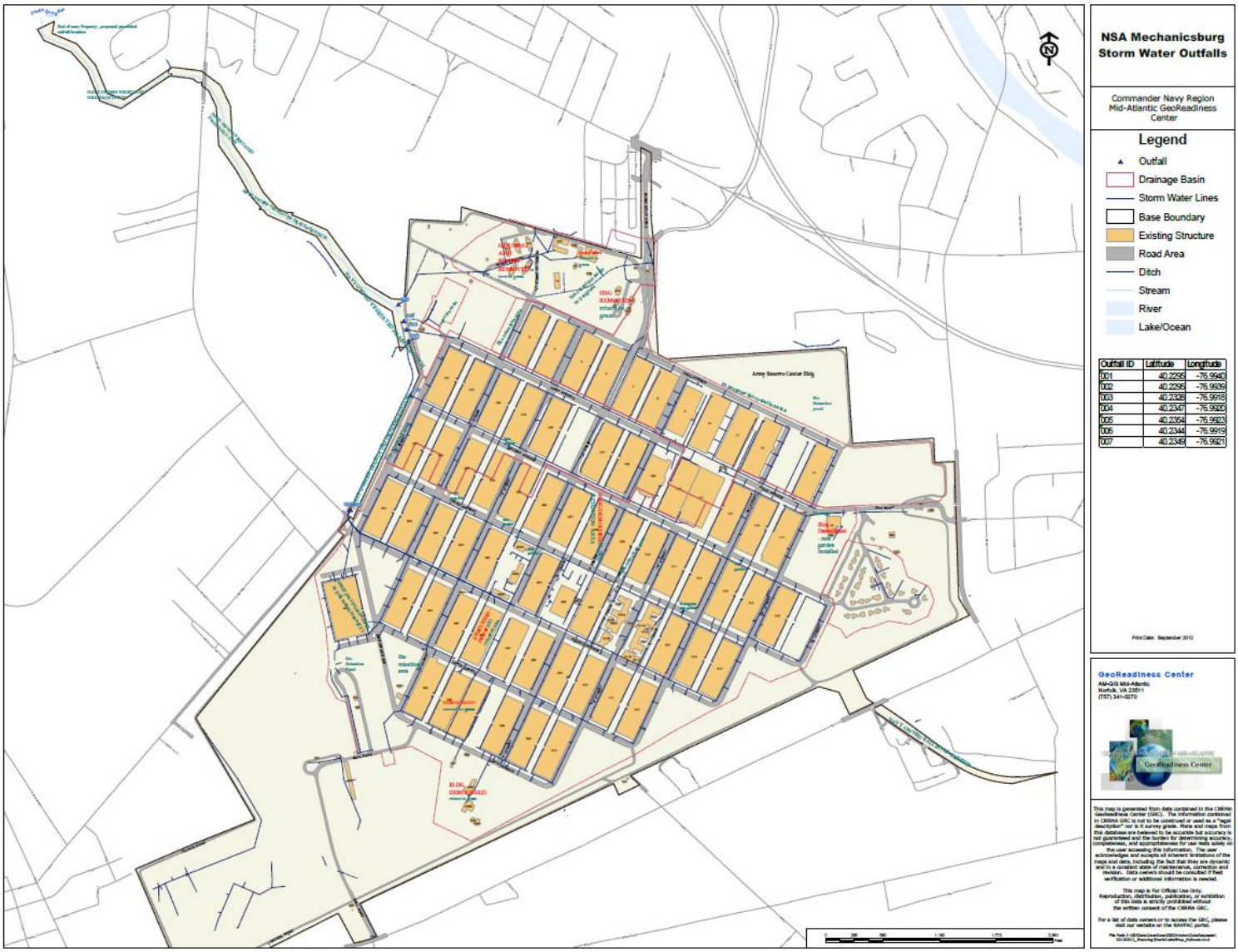
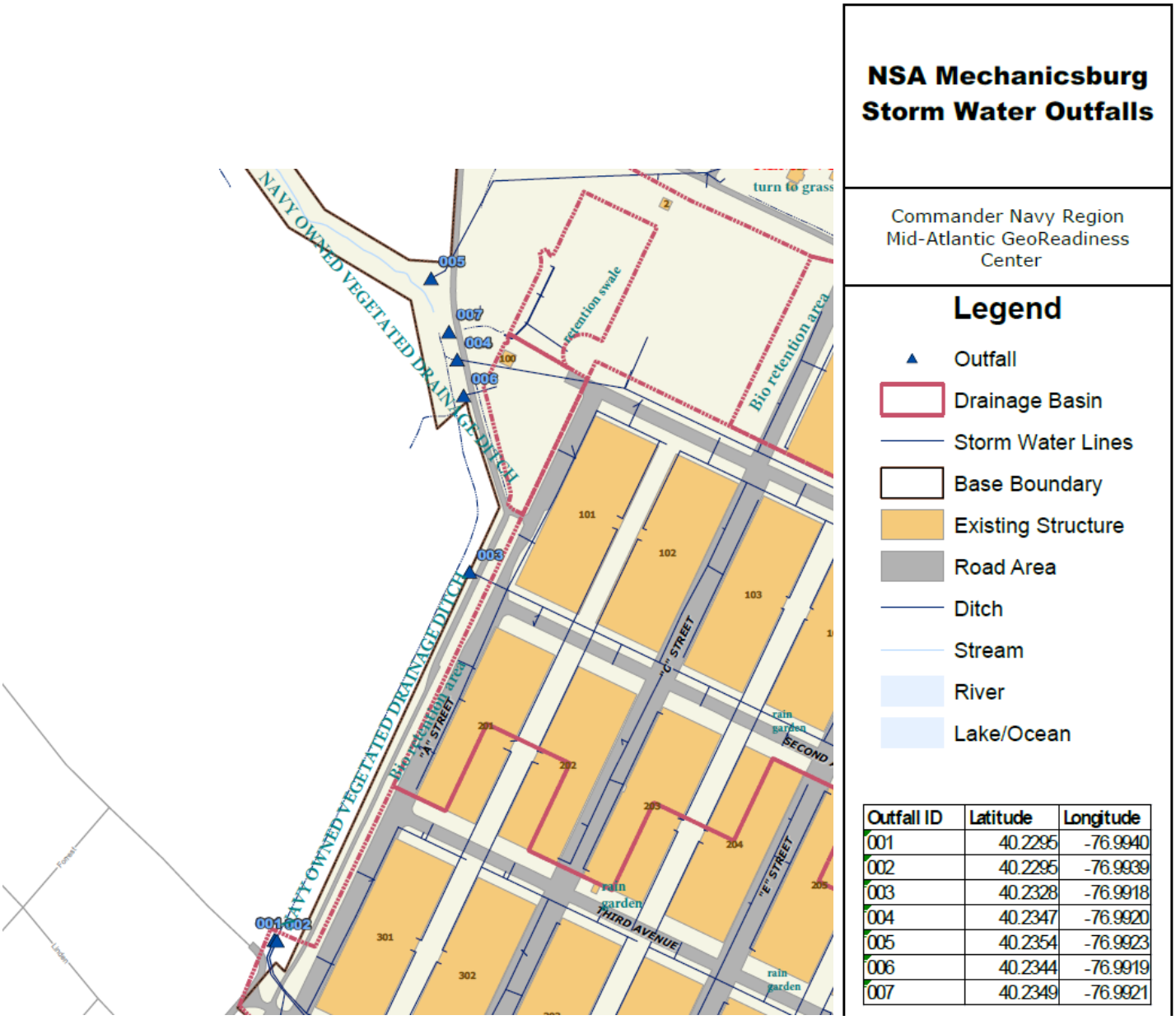


Figure 1. Site Plan



Outfall ID	Latitude	Longitude
001	40.2295	-76.9940
002	40.2295	-76.9939
003	40.2328	-76.9918
004	40.2347	-76.9920
005	40.2354	-76.9923
006	40.2344	-76.9919
007	40.2349	-76.9921

Figure 1a. Site Plan: Outfall Locations and Legend

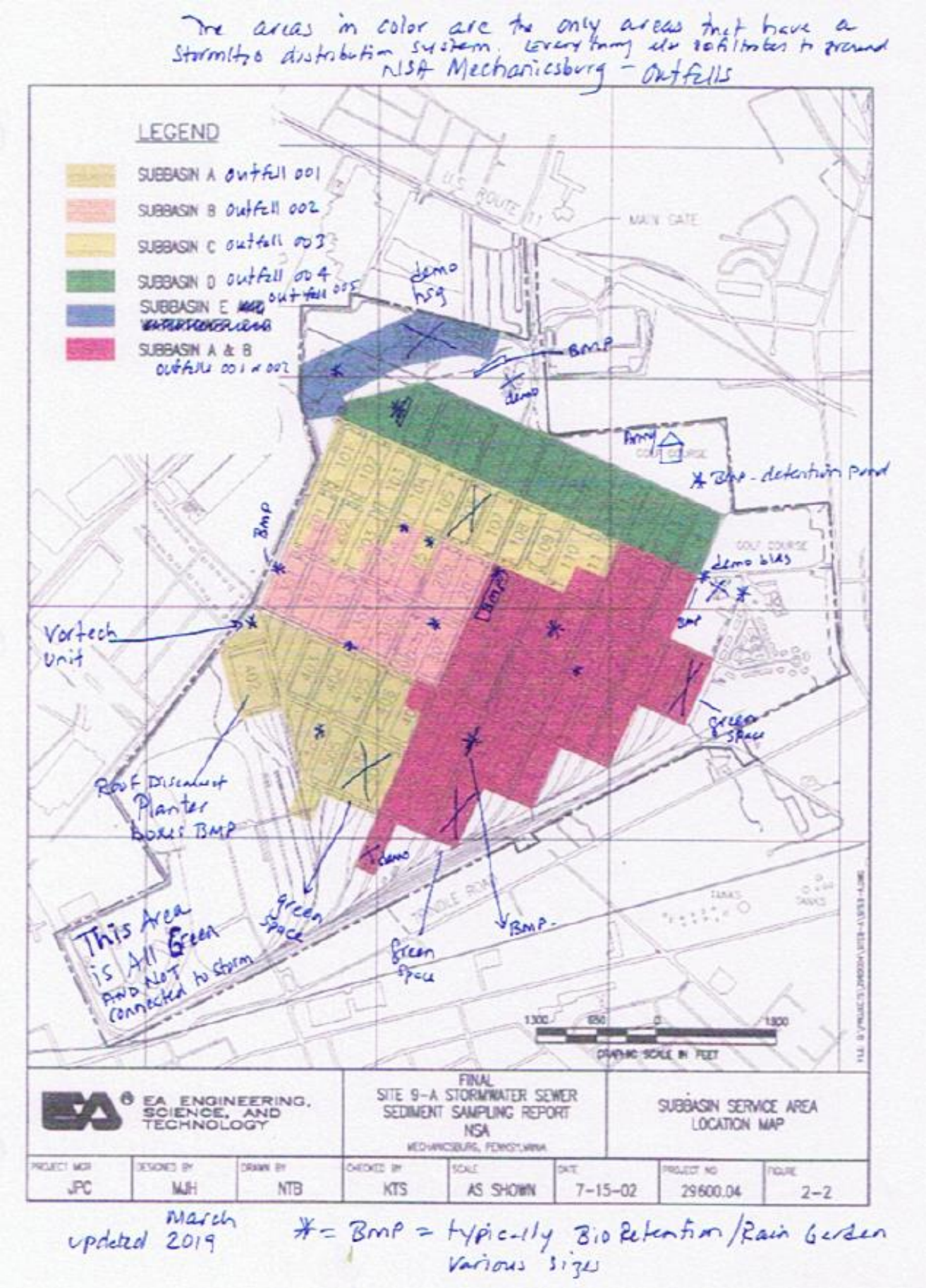


Figure 2. Outfall Subbasins and BMP Locations