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PERKIOMEN TOWNSHIP MS4 PERMITTING 2022 UPDATE




Date: June 7, 2022
Board of Supervisors Meeting

What is MS4?

- MS4 – Municipal Separate Storm Sewer System
 - Municipal Collection & Conveyance Systems
 - PA DEP NPDES Permit - “Small MS4”
 - Annual Reporting
 - July 1 - June 30
 - Objectives: Improve Water Quality & Promote Public Participation

3800-PM-BCW0100d 5/2016
Permit

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

 **PAG-13**
**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT FOR STORMWATER DISCHARGES FROM
SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)
APPROVAL OF COVERAGE**

NPDES PERMIT NO. PAG130069

In compliance with the provisions of the Clean Water Act, 33 U.S.C. Section 1251 et seq. ("the Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 et seq.,

Perkiomen Township Montgomery County
1 Trappe Road
Collegeville, PA 19426-1829

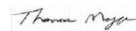
is authorized to discharge from a regulated small municipal separate storm sewer system (MS4) located in **Perkiomen Township, Montgomery County** to **Schoolhouse Run (TSF, MF), Perkiomen Creek (WWF, MF), Unnamed Tributary of Perkiomen Creek (TSF, MF), and Unnamed Tributary to Perkiomen Creek (TSF, MF)** in Watershed(s) **3-E** in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

APPROVAL OF COVERAGE TO DISCHARGE UNDER THIS GENERAL NPDES PERMIT IS AUTHORIZED BEGINNING ON May 28, 2021 . WHEN THE GENERAL PERMIT IS RENEWED, REISSUED OR MODIFIED, THE FACILITY OR ACTIVITY COVERED BY THIS APPROVAL FOR COVERAGE MUST COMPLY WITH THE FINAL RENEWED, REISSUED OR MODIFIED GENERAL PERMIT.

The authority granted by coverage under this General Permit is subject to the following further qualifications:

1. The permittee shall comply with the effluent limitations and reporting requirements contained in this General Permit.
2. Following initial coverage under this General Permit, the submission of Annual MS4 Status Reports in accordance with Part A III.D of the General Permit shall constitute the permittee's Notice of Intent (NOI) for continued coverage under the General Permit. The permittee shall be responsible for complying with the final renewed, reissued or amended General Permit. If the permittee is unable to comply with the renewed or amended General Permit, the permittee must submit an application for an individual NPDES permit within 90 days of publication of the final General Permit.
3. The NOI and its supporting documents are incorporated into this approval of coverage. If there is a conflict between the NOI or its supporting documents and the terms and conditions of this General Permit, the terms and conditions of this General Permit shall apply.
4. Failure to comply with the terms, conditions, or effluent limitations of this General Permit is grounds for enforcement action, permit termination or revocation.
5. The permittee shall implement Pollutant Control Measures as specified in **Appendix B**
6. The permittee shall achieve pollutant loading reductions for **sediment** as specified in **Appendix E** by **May 30, 2026**.

This approval of coverage is authorized by:


Thomas L. Magge
Environmental Program Manager
Southeast Regional Office
Department of Environmental Protection

- 1 -



What is an MCM?

- MCM – Minimum Control Measures
 - 1 – Public Education & Outreach
 - 2 – Public Involvement / Participation
 - 3 – Illicit Discharge Detection & Elimination (IDD&E)
 - 4 – Construction Site Stormwater Runoff Control
 - 5 – Post-Construction Stormwater Management
 - 6 – Pollution Prevention / Good Housekeeping

PA Clean Water Academy

PRP - Pollution Reduction Plan



What is a BMP?

■ BMP – Best Management Practice

- Techniques, Activities, Practices, Measures, or Structural Controls used to Manage and Improve the Quality of Stormwater Runoff



Bioretention
Basin



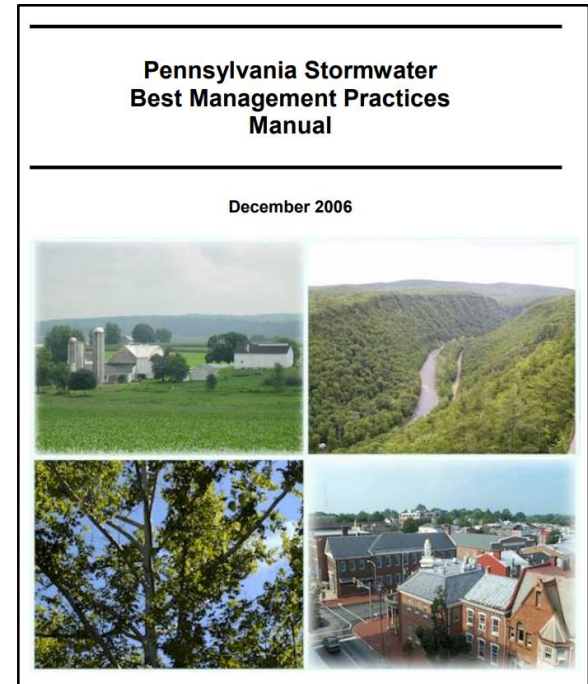
Bioswale



Rain Garden

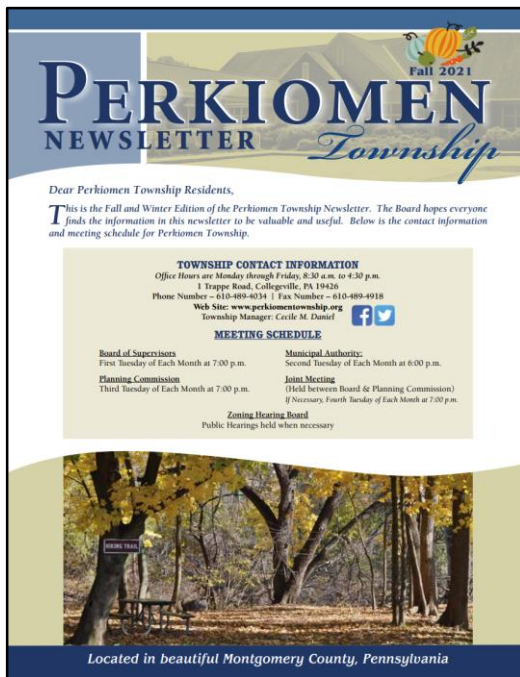


Infiltration Bed



MCM 1 – Public Education & Outreach

- BMP 1 - Develop, Implement, & Maintain Public Outreach Program
- BMP 2 - Maintain a Target Audience List
- BMP 3 - Publish Educational Items
- BMP 4 - Distribute Educational Materials to Target Audience



PERKIOMEN NEWSLETTER Fall 2021 Township

Dear Perkiomen Township Residents,

This is the Fall and Winter Edition of the Perkiomen Township Newsletter. The Board hopes everyone finds the information in this newsletter to be valuable and useful. Below is the contact information and meeting schedule for Perkiomen Township.

TOWNSHIP CONTACT INFORMATION
Office Hours are Monday through Friday, 8:30 a.m. to 4:30 p.m.
1 Trappe Road, Collegeville, PA 19426
Phone Number – 610-889-4034 | Fax Number – 610-889-4918
Web Site: www.perkiomentownship.org
Township Manager: Cecile M. Daniel

MEETING SCHEDULE

Board of Supervisors First Tuesday of Each Month at 7:00 p.m.	Municipal Authority Second Tuesday of Each Month at 6:00 p.m.
Planning Commission Third Tuesday of Each Month at 7:00 p.m.	Joint Meeting (Held between Board & Planning Commission) If Necessary, Fourth Tuesday of Each Month at 7:00 p.m.
Zoning Hearing Board Public Hearings held when necessary	

Located in beautiful Montgomery County, Pennsylvania




Perkiomen Township

Home Departments Sewer Bill Payments Forms Calendar Links Contact Us About Us

The Pride of Pennsylvania

Perkiomen Township was established in 1886 after a court appointed commission split Skipack Township and Perkiomen Township along the Perkiomen Creek. At that time the township was classified as a township of the second-class. Under that classification, a Board of Supervisors was established as the governing body. This body can be made up of either three or five members. In Perkiomen Township's case the board is made up of five members.

Don't Let Storm Water Run Off With Your Time and Money!

What the Construction Industry Should Know About Storm Water In Our Community

The construction industry plays an important role in improving our community's quality of life by not only providing new development, but also protecting our streams and rivers through smart business practices that prevent pollution from leaving construction sites.

Storm water runoff leaving construction sites can carry pollutants such as dirt, construction debris, oil, and paint off-site and into storm drains. In our community, storm drains carry storm water runoff directly to local creeks, streams, and rivers with no treatment. Developers, contractors, and homebuilders can help to prevent storm water pollution by taking the following steps:

1. Comply with storm water permit requirements.
2. Practice erosion control and pollution prevention practices to keep construction sites "clean."
3. Conduct advanced planning and training to ensure proper implementation on-site.

The remainder of this fact sheet addresses these three steps.

Storm Water Permit Requirements for Construction Activity
Planning and permitting requirements exist for construction activities. These requirements are intended to minimize storm water pollutants leaving construction sites.

- Pennsylvania's Erosion and Sediment Pollution Control Program (25 Pa. Code, Chapter 102) requires Erosion and Sediment Control Plans for all earth disturbing activities.
- The National Pollutant Discharge Elimination System (NPDES) Permit Program (25 Pa. Code, Chapter 92) requires that construction activities disturbing greater than one acre submit a Notice of Intent for coverage under a general NPDES permit.

Knowing your requirements before starting a project and following them during construction can save you time and money, and demonstrate that you are a partner in improving our community's quality of life. For more information about these programs, contact your local county conservation district office or the Department of Environmental Protection.

Erosion Control Practices:

- Berms/traps (e.g. silt fence)
- Sediment traps
- Immediate revegetation
- Phased, minimized grading
- Construction entrance
- Protection of streams and drainage ways
- Inlet protection

An Ounce of Prevention
Rain that falls onto construction sites is likely to carry away soil particles and other toxic chemicals present on construction sites (oil, grease, hazardous wastes, fuel). Storm water, if not properly managed, carries these pollutants to streams, rivers, and lakes. Erosion and sediment control practices can serve as a first line of defense.



MCM 2 – Public Involvement / Participation

- BMP 1 - Develop, Implement, & Maintain Public Participation Program (PIPP)
- BMP 2 - Provide Public MS4 Related Notices
- BMP 3 - Solicit Public Involvement



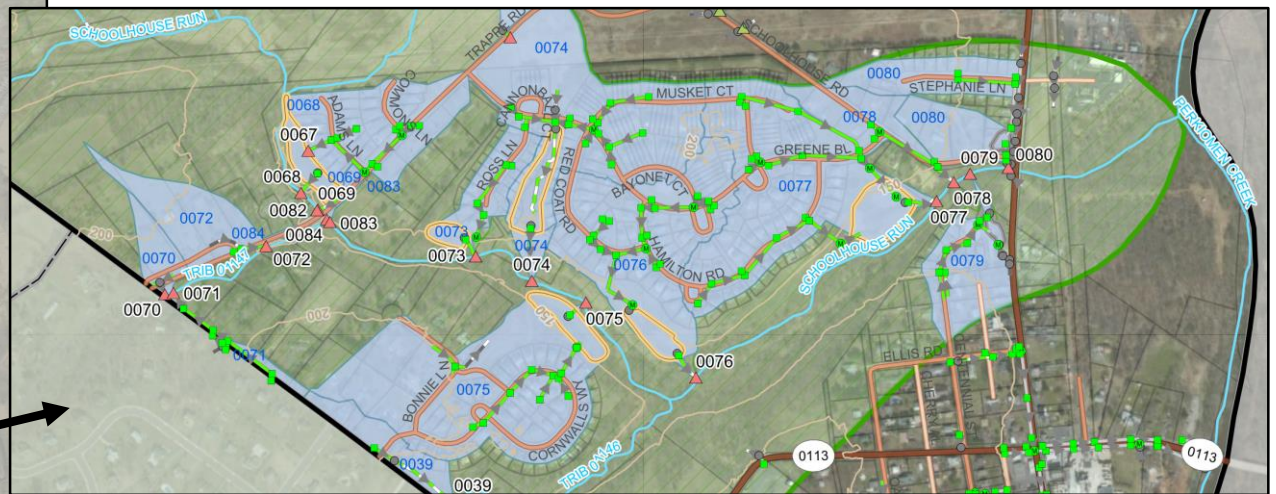
2022 Municipal Members with MS4 benefits:

Perkasie Borough
East Greenville Borough
Marlborough Township
Salford Township
Upper Pottsgrove
Hilltown Township
West Rockhill Township
Lower Pottsgrove
Borough of Pennsburg
Lower Providence Township
New Hanover Township
Upper Milford Township
Schwenksville Borough
Lansdale Borough
Lower Frederick
Upper Frederick Township
Lower Salford Township
Limerick Township
Upper Gwynedd Township
Sellersville Borough
Towamencin Township
Borough of Trappe
Borough of Souderton
Upper Salford Township
Perkiomen Township
Telford Borough



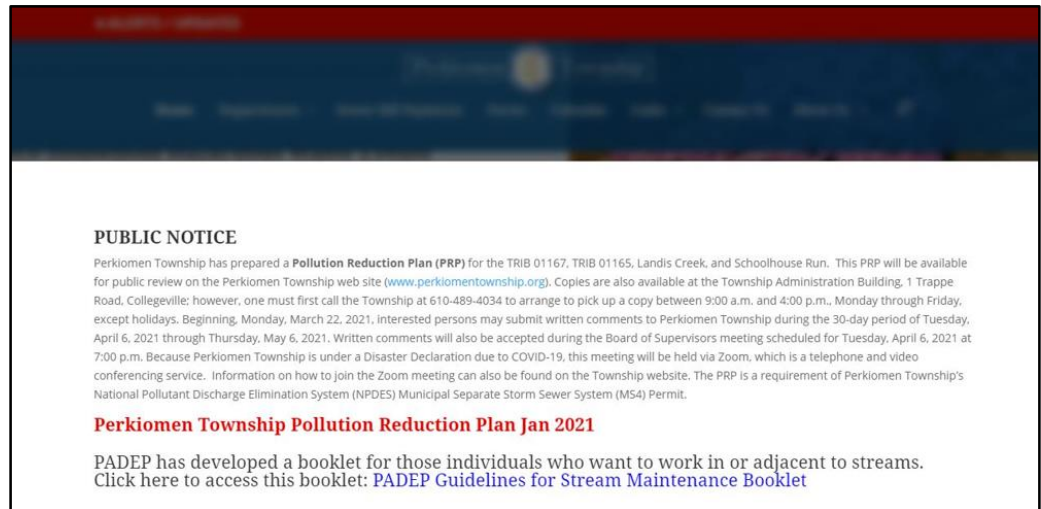
MCM 3 – Illicit Discharge Detection & Elimination

- BMP 1 - Develop and Implement a Written Program
- BMP 2 - Maintain Mapping of MS4 System and Outfalls
- BMP 3 - Maintain Map so Storm Sewer Collection and Conveyance System



MCM 3 – Illicit Discharge Detection & Elimination

- BMP 4 - Conduct Dry Weather Screening at Outfalls
- BMP 5 - Enact 2022 Model Stormwater Ordinance
- BMP 6 - Provide Education Outreach to Target Audience on Detecting IDDE



PUBLIC NOTICE

Perkiomen Township has prepared a **Pollution Reduction Plan (PRP)** for the TRIB 01167, TRIB 01165, Landis Creek, and Schoolhouse Run. This PRP will be available for public review on the Perkiomen Township web site (www.perkiomentownship.org). Copies are also available at the Township Administration Building, 1 Trappe Road, Collegeville; however, one must first call the Township at 610-489-4034 to arrange to pick up a copy between 9:00 a.m. and 4:00 p.m., Monday through Friday, except holidays. Beginning, Monday, March 22, 2021, interested persons may submit written comments to Perkiomen Township during the 30-day period of Tuesday, April 6, 2021 through Thursday, May 6, 2021. Written comments will also be accepted during the Board of Supervisors meeting scheduled for Tuesday, April 6, 2021 at 7:00 p.m. Because Perkiomen Township is under a Disaster Declaration due to COVID-19, this meeting will be held via Zoom, which is a telephone and video conferencing service. Information on how to join the Zoom meeting can also be found on the Township website. The PRP is a requirement of Perkiomen Township's National Pollutant Discharge Elimination System (NPDES) Municipal Separate Storm Sewer System (MS4) Permit.

Perkiomen Township Pollution Reduction Plan Jan 2021

PADEP has developed a booklet for those individuals who want to work in or adjacent to streams. Click here to access this booklet: [PADEP Guidelines for Stream Maintenance Booklet](#)

MCM 3 – Illicit Discharge Detection & Elimination



MCM 4 – Construction Site Stormwater Runoff Control

- BMP 1 - Implement Program and Procedures to Ensure Permit Compliance
- BMP 2 - Ensure Adequate Erosion & Sediment Pollution Control Measures / Notify DEP of Projects Over 1 Acre
- BMP 3 - Enforce Ordinance & O&M Maintenance
- BMP 4 - Review E&S Plans
- BMP 5 - Perform E&S Inspections
- BMP 6 - Conduct Enforcement when in Non-Compliance
- BMP 7 - Develop Requirement for Site Operators to Control Waste
- BMP 8 - Develop procedure for Handling a Complaint or Violation



Perkiomen / SSM Participation

- Ordinances:
 - SWM: §247-21 - Erosion & Sedimentation Requirements
 - SALDO: §264-32 – Erosion & Sediment Control Guidelines
- 1 Acre or more Disturbance (NPDES Permit) – MCCD
- Less than 1 Acre Disturbance – SSM
- Enforcement / Tracking BMPs
- Complaints – Citizens Complaint Form

PERKIOMEN TOWNSHIP CITIZEN'S COMPLAINT FORM	
1 TRAPPE ROAD COLLEGEVILLE, PA 19426 610-489-4034 (PHONE) 610-489-4918 (FAX)	
TOWNSHIP USE ONLY	
Date Received: / /	Received By:
Time:	
NAME & ADDRESS OF VIOLATION / VIOLATOR	
Owner Name(s):	
Address:	
Cross Streets:	and
PERSON MAKING COMPLAINT (must be filled out completely)	
<small>Please Print Legibly</small>	
Name:	Phone #:
Address:	
City, State, Zip:	
Complainant Signature:	
REQUESTED SERVICE OR INFORMATION	
TOWNSHIP RESPONSE	
Investigated On: / /	By:
Time:	Response:
<small>Note: Any complaint filed is public information. Should this matter proceed before a District Justice, you will be notified and you may be called as a witness in the case.</small>	

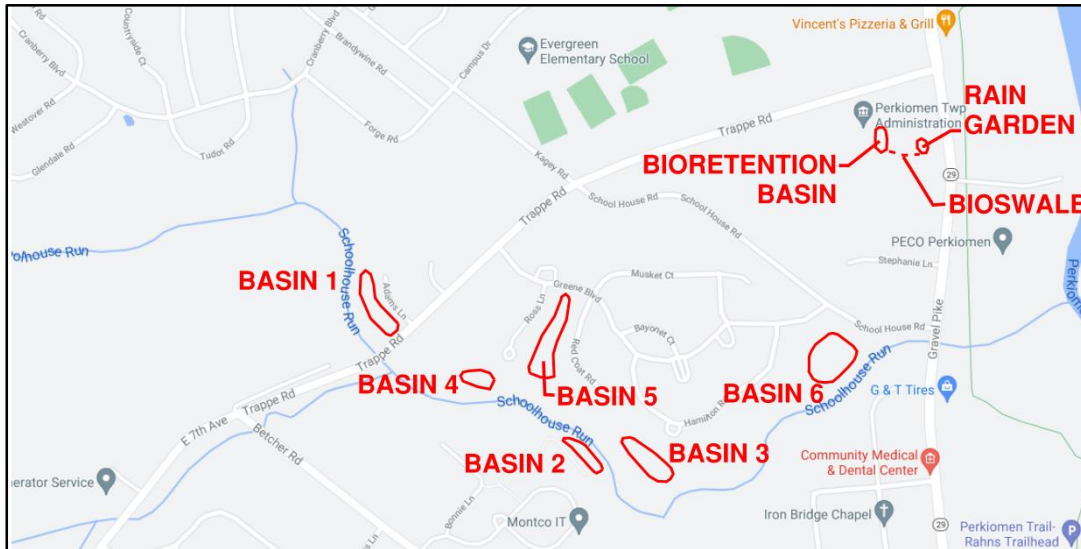


MCM 5 – Post- Construction Stormwater Management

- BMP 1 - Enact, Implement, and Enforce Stormwater Ordinance
 - 2022 Model Stormwater Ordinance by 09/30/2022
- BMP 2 - Encourage Low Impact Development (LID)
- BMP 3 - Ensure Stormwater Operation & Maintenance (O&M)
 - Track BMP O&M Township Wide
- BMP 4 - Requiring Adequate BMPs to Maintain Water Quality
- BMP 5 - Ensure BMPs are Properly Constructed
- BMP 6 - Develop and Implement a Written Program



MCM 5 – Post- Construction Stormwater Management



Stormwater Operation and Maintenance (O&M):

- Township
 - Perform Township BMP Maintenance Annually
- Residents
 - Criteria 1 – Homeowner who individually owns their own BMP.
 - Upon Request
 - Criteria 2 – All other parties proposing new improvements requiring an O&M agreement.
 - Per DEP Guidelines: (1) Annual Reporting for first 5 years; (2) Reporting every 3 years in perpetuity; (3) Reporting after a 10-yr storm event; (4) Upon Township request.
- Approach: Let residents police themselves until an issue occurs, then become involved, if necessary.

3150-FM-BWEW0092 Rev. 1/2016 COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATERSHED MANAGEMENT Permit No. PAC460279 Report No. 21.01

EARTH DISTURBANCE INSPECTION REPORT

Project Name: 817 Limerick Road Inspection Date: 5/18/2021 Inspection Time: 11:37
 Weather Conditions: Warm, 77° Total Project Area: 6.01
 Location: 817 Limerick Road Total Disturbed Area: 2.58
 Municipality: Perkiomen County: Montgomery
 Receiving Water(s): UNT to Perkiomen Designated/Existing Use: TSF, MF



Responsible Party(s):
 (name & address) _____

 Phone: _____

Site Representative (name): _____ (title) None Inspector (name): Janel Fishpaw (title) Resource Conservationist

Type of Inspection (check only one):
 Routine complete Routine partial Follow-up Photographs Taken: Yes No
 Complaint Final

Site Description & Observations:
 At the time of this inspection Lot 3 was being prepped for seed and mulch.

Lots 2 and 4 do not appear to meet the required 70% uniform stabilization (t, u, w).

Continued on page 3 of 4.

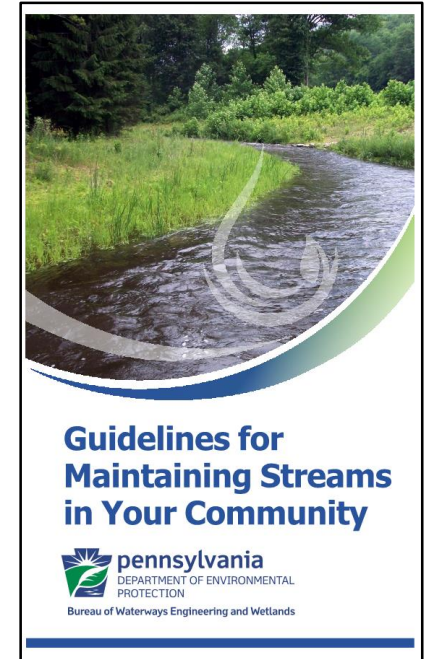
Permit and Plan Requirements		Type of Activity (check as many as appropriate)	
Y	N	<input type="checkbox"/> Pub. Road Constr./Maint. (PRC)	<input type="checkbox"/> Other _____
<input checked="" type="checkbox"/>	<input type="checkbox"/> Written Erosion & Sediment Plan required	<input type="checkbox"/> Res. Subdivision (RSBD)	<input type="checkbox"/> Pvt. _____
<input checked="" type="checkbox"/>	<input type="checkbox"/> Written Post Construction Stormwater Management Plan required	<input type="checkbox"/> Govt. Facilities (GOV)	<input type="checkbox"/> Comm./Indust. Dev. _____
<input type="checkbox"/>	<input checked="" type="checkbox"/> Erosion & Sediment Plan requested	<input type="checkbox"/> Utilities Facilities (UTL)	<input checked="" type="checkbox"/> Recreation Facilities _____
<input checked="" type="checkbox"/>	<input type="checkbox"/> Post Construction Stormwater Management Plan requested	<input type="checkbox"/> Sewer/Water Systems (SWS)	<input type="checkbox"/> Agricul. Activities _____
<input checked="" type="checkbox"/>	<input type="checkbox"/> E & S Permit required	<input type="checkbox"/> Remediation/Restoration (RRES)	<input type="checkbox"/> Pipeline (PL) _____
<input checked="" type="checkbox"/>	<input type="checkbox"/> NPDES Permit required	<input type="checkbox"/> Non-Phased Constr.	<input type="checkbox"/> Silviculture (SILV) _____
<input type="checkbox"/>	<input type="checkbox"/> Phased Constr.		
Permit #: PAC460279	Exp. Date: 12/19/23		

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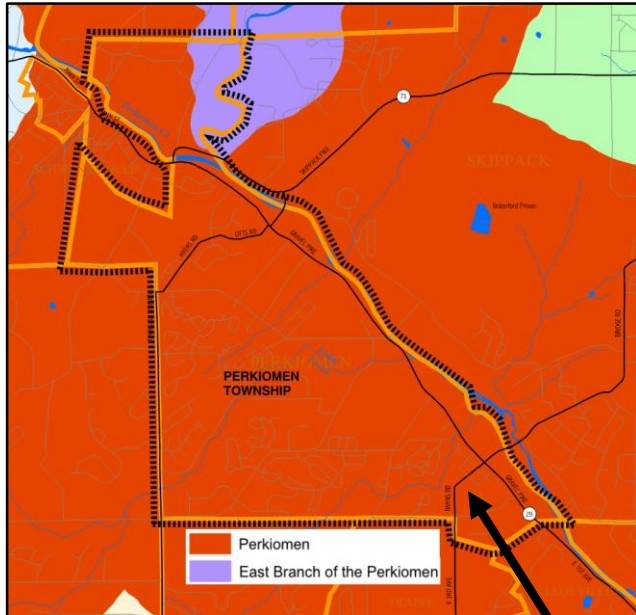
MCM 6 – Pollution Prevention / Good Housekeeping

- BMP 1 - Maintain List of Operations Contributing to Runoff
- BMP 2 - Implement Operation and Maintenance Program
- BMP 3 - Implement Training Program to Township Staff, Public Officials, etc.

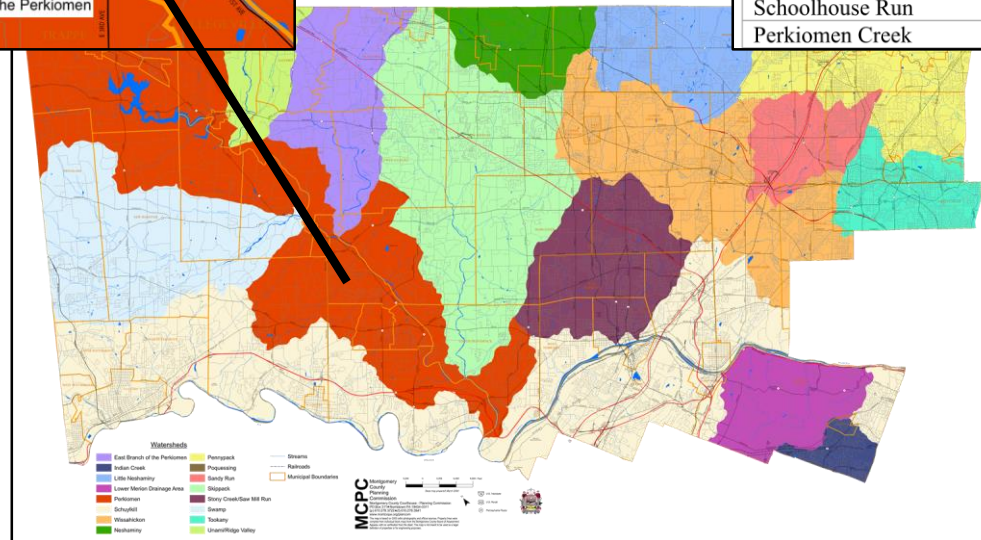


Perkiomen Watersheds & Streams

- East Branch Perkiomen Creek
 - East Branch Perkiomen Creek
- Perkiomen Creek / Unnamed Tributaries
 - Lodal Creek
 - Schoolhouse Run
 - Mine Run
 - Landis Creek



Montgomery County, Pennsylvania



Impaired Downstream Waters Name	Impairment
Unnamed Tributaries to Perkiomen Creek ¹	Siltation
Schoolhouse Run	Siltation
Perkiomen Creek	Pathogens



What is a Pollutant Reduction Plan (PRP)?

- PA DEP Mandate to Reduce Pollutants / Improve Water Quality

- Siltation by 10%
- Total Phosphorus by 5%
- Total Nitrogen by 3%

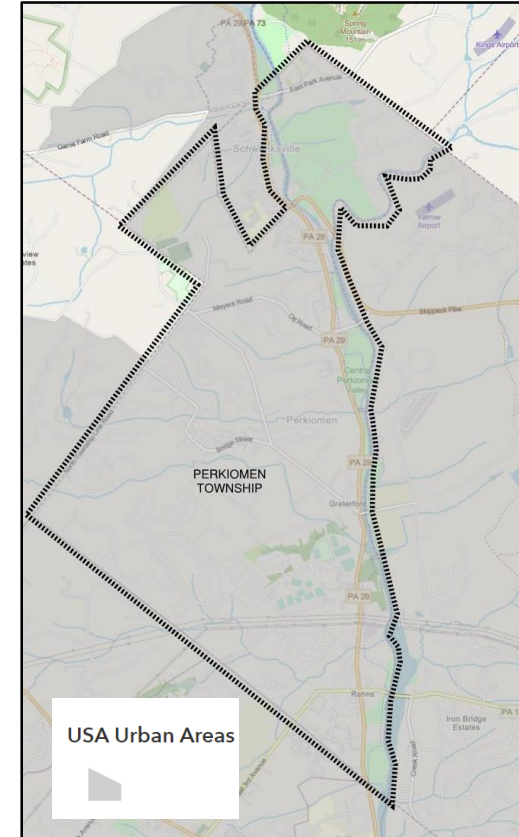
- Based on Census Data – “Urbanized Areas”

- Based on PA DEP “Loading Rates”

County	Category	Acres	TN lbs/acre/yr	TP lbs/acre/yr	TSS (Sediment) lbs/acre/yr
All Other Counties	impervious developed	-	23.06	2.28	1,839
	pervious developed	-	20.72	0.84	264.96

- Utilizes BMP “Effectiveness”

BMP Name	BMP Effectiveness Values			BMP Description
	TN	TP	Sediment	
Dry Extended Detention Basins	20%	20%	60%	Dry extended detention (ED) basins are depressions created by excavation or berm construction that temporarily store runoff and release it slowly via surface flow or groundwater infiltration following storms. Dry ED basins are designed to dry out between storm events, in contrast with wet ponds, which contain standing water permanently. As such, they are similar in construction and function to dry detention basins, except that the duration of detention of stormwater is designed to be longer, theoretically improving treatment effectiveness.
Bioretention / Raingarden (A/B soils w/o underdrain)	80%	85%	90%	An excavated pit backfilled with engineered media, topsoil, mulch, and vegetation. These are planting areas installed in shallow basins in which the storm water runoff is temporarily ponded and then treated by filtering through the bed components, and through biological and biochemical reactions within the soil matrix and around the root zones of the plants. This BMP has no underdrain and is in A or B soil.
Stream Restoration	0.075 lbs/ft/yr	0.068 lbs/ft/yr	44.88 lbs/ft/yr	An annual mass nutrient and sediment reduction credit for qualifying stream restoration practices that prevent channel or bank erosion that otherwise would be delivered downstream from an actively enlarging or incising urban stream. Applies to 0 to 3rd order streams that are not tidally influenced. If one of the protocols is cited and pounds are reported, then the mass reduction is received for the protocol.



- Requires Mapping of “Planning Area”

- Sewershed Area Draining to Municipal System in Urbanized Areas.



What is our Plan?



Reduce Sediment by Stream Restoration

- 41,788 lbs Reduction Required.
- 1,300 LF Restoration = 42,600 lbs +/-



Stream Restoration



How are we doing? / What is Next?

- GREAT! Currently No MCM Deficiencies (Per Checklist)!!!



SENT VIA ELECTRONIC MAIL TO cdaniel@perktwp.org

October 14, 2021

Cecile Daniel
Perkiomen Township
1 Trappe Road
Collegeville, PA 19426-1829

Re: MS4 Periodic Report Review
Perkiomen Township MS4 UA
NPDES Permit No. PAG130069
Perkiomen Township, Montgomery County

Dear Ms. Daniel:

Thank you for submitting your 2016-2018, 2019-2020 and 2020-2021 Annual MS4 Status Reports as required by the NPDES permit. The Department of Environmental Protection (DEP) has reviewed your reports and has the following comments:



MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) REVIEW CHECKLIST FOR ANNUAL REPORTS

For the Reporting Period: 3/16/2016 to 6/30/2021

Permittee Name: Perkiomen Township Montgomery County NPDES Permit No.: PAG130069

Due Date: 9/30/2018, 9/30/2020, 9/30/2021

Date Received: 9/26/2018, 9/25/2020, 9/25/2021

szeredai, nick

From: Mahoney, Elizabeth <emahoney@pa.gov>
Sent: Friday, March 18, 2022 10:47 AM
To: szeredai, nick
Cc: cdaniel@perktwp.org; kepicardi; John Moran; morey, kent
Subject: RE: [External] 100685.0151 - Perkiomen Township - MS4 Meeting - Thank You
Attachments: PAG130069_MISC_20210922_Draft_v1 rev 3-18-22.pdf

Good morning, Nick:

First, I'd like to thank Perkiomen Twp., you and Kent for last month's call. I feel that our discussion was very productive. I've reconsidered the Township's annual report in the context of our conversation. Based on our discussion, I have revised the checklist to show MCM 6 as being adequately addressed. The revised checklist is attached. Please note that I will not be sending out a revised letter as the comments in the letter were advisory in nature.

Please let me know if you have any questions. Thank you.

Beth



What is Next?

No.	Task / Requirement	Deadline	Notes
1	2022 Model Stormwater Ordinance	9/30/2022	PC Approved / In Progress
2	Prepare a Pathogens Map	9/30/2022	In Progress (Past Due 9/30/2019)
3	Pathogens - Inventory	9/30/2022	In Progress
4	2021-2022 Annual Reporting	9/30/2022	Start in 8/2022
5	Illicit Discharge Detection & Elimination (IDD&E)	3/15/2023	Planned for 4/2022
6	PRP Implementation / Stream Restoration Construction	3/15/2023	Bid and Const. 2022-2023



Files!

- 2017 Perkiomen Township Pollutant Reduction Plan
- 2019-2020 Perkiomen Township Annual Status Report
- 2021 Perkiomen Township Pollutant Reduction Plan
- 2020-2021 Perkiomen Township Annual Status Report
- 2020-2021 DEP Review
- 2020-2021 DEP Checklist
- Bridge St - Stream Restoration Plans (In Progress)
- Bridge St - Existing Conditions
- Township BMP Inspection Report
- Stormwater Ordinance (In Progress)
- Township MS4 NPDES PAG-13 (Through May 30, 2026)



Questions?



SPOTTS | STEVENS | MCCOY

Engineering, Surveying and Environmental Services

ssmgroup.com

Nicholas Szeredai, PE

Municipal Engineer

E: nick.szeredai@ssmgroup.com

P: 610-468-4742