



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: City of Williamsport MS4
Facility Address: 253 W 4th Street, Williamsport, PA 17701
Mailing Address: 253 W 4th Street, Williamsport, PA 17701

Report Prepared on: 3/24/2021
Date

By: Taylor Fontaine
Environmental Scientist (PG Environmental)
Signature

Report Final as of: _____ By: _____, EPA
Date *Signature*

General Information

Type of Inspection:	MS4 Compliance Inspection
Owner:	City of Williamsport
Operator:	City of Williamsport (at the time of the inspection), Williamsport Sanitary Authority (as of March 1, 2021)
Permittee:	City of Williamsport
NPDES Permit No:	PAI134813
NPDES Permit Effective Date:	December 1, 2020
NPDES Permit Expiration Date:	November 30, 2025
Receiving Water(s) and/or MS4:	Susquehanna River, Daugherty Run, Fox Hollow Run, Spring Run, Lycoming Creek, Cemetery Run, Grafius Run, and McClures Run
Latitude and Longitude:	41.2401, -77.0064

On-Site Facility Site Visits Overview:

On February 9, 2021, representatives from U.S. Environmental Protection Agency (EPA) Region 3 and EPA contractors, PG Environmental and Eastern Research Group (ERG), (hereinafter, EPA Inspection Team) conducted site visit inspections of multiple locations managed under the City of Williamsport, Pennsylvania (hereinafter, City or Permittee) municipal separate storm sewer system (MS4) program. These in-person site visits complement an offsite compliance audit of the City's MS4 program conducted October 28-30, 2020. The site visit inspections were conducted separately from the October 28-30, 2020, offsite compliance audit, and were intended to support and expand upon the assessment of the City's compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Individual Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s) (Permit No. PAI134813;

hereinafter, the Permit). It should be noted that this new Permit became effective on December 1, 2020 and this report is based upon those requirements, whereas the October compliance audit was based upon the previous Permit's requirements. The contracted inspectors were not accompanied on the inspection by state representatives.

This report includes observations and photographs from inspections conducted at two City owned and operated facilities, six City operated outfalls, and four City and privately operated stormwater best management practices (BMPs) that the City inspects to verify proper long-term operation and maintenance.

Approximate Entry Time: 9:00 AM (EST) **Approximate Exit Time:** 3:00 PM (EST)

Unique Project Identifier (UPI): 3E21WN010A

TABLE OF CONTENTS

	Page
I. INTRODUCTION.....	4
Weather and Precipitation	4
II. INSPECTION PROCESS	4
Inspection Opening Conference	4
Site Visits Observations	5

Appendix A: Exhibit Log

- Exhibit 1 – City of Williamsport Municipal Complex Inspection Checklist (Dated February 9, 2021)
- Exhibit 2 – City of Williamsport River Valley Transit Facility Inspection Checklist (Dated February 9, 2021)
- Exhibit 3 – City of Williamsport Outfall Screening Reports (Dated January 28, 2021)
- Exhibit 4 – Laurel Run Circle BMP Inspection Maintenance Notice
- Exhibit 5 – City of Williamsport Laurel Run Circle BMP Inspection Checklist (Dated February 9, 2021)
- Exhibit 6 – City of Williamsport Grey Fox Rentals BMP Inspection Checklist (Dated February 9, 2021)
- Exhibit 7 – City of Williamsport Pace Analytical BMP Inspection Checklist (Dated February 9, 2021)
- Exhibit 8 – WSA West Plant BMP Inspection Checklist (Dated February 9, 2021)
- Exhibit 9 – Long Term Operations & Maintenance Plan for the WSA West Plant BMPs
- Exhibit 10 – WSA West Plant routine quarterly inspection records (May 2020 – January 2021)
- Exhibit 11 – WSA West Plant 2020 Annual Inspection Form

Appendix B: NPDES Permit No. PAI134813

I. INTRODUCTION

Weather and Precipitation

The inspection was originally scheduled for Wednesday, February 3, 2021, but was rescheduled due to heavy snowfall in the Williamsport area. It should be noted that there was approximately 6-12 inches of snow on the ground at the time of the inspection, which limited visibility of ground conditions at certain sites. During the inspection, there were cloudy skies and temperatures averaging approximately 28 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and seven days prior are provided in the table below. The area received approximately one inch of snowfall during the EPA inspection.

Table 1. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount on Ground (inches) ¹
Williamsport Regional Airport, PA US – USW00014778	February 2, 2021	11.0
Williamsport Regional Airport, PA US – USW00014778	February 3, 2021	11.0
Williamsport Regional Airport, PA US – USW00014778	February 4, 2021	---
Williamsport Regional Airport, PA US – USW00014778	February 5, 2021	8.0
Williamsport Regional Airport, PA US – USW00014778	February 6, 2021	6.0
Williamsport Regional Airport, PA US – USW00014778	February 7, 2021	6.0
Williamsport Regional Airport, PA US – USW00014778	February 8, 2021	6.0
Williamsport Regional Airport, PA US – USW00014778	February 9, 2021	7.0

The City's activities are regulated under National Pollutant Discharge Elimination System (NPDES) Permit No. PAI134813 (hereinafter, Permit), which became effective on December 1, 2020, and expires November 30, 2025 (refer to Appendix B).

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Williamsport Streets Department and River Valley Transit Municipal Complex at 9:00 AM (EST) for the inspection. Taylor Fontaine of PG Environmental, Cassidy Owen of ERG, and Rebecca Serfass of EPA Region 3 displayed their inspector credentials to the City representatives at the outset of the inspection and explained the purpose of the inspection was to make field observations to complement an offsite compliance audit of the City's MS4 program conducted October 28-30, 2020. Contact information for the primary City representatives for the audit is included below in Table 2. A copy of the Permit is provided in Appendix B.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Table 2. Primary City Representative Contact Information

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport (570) 220-1872, jsander@cityofwilliamsport.org
Marcia LeBeau	Environmental Supervisor, Williamsport Sanitary Authority (WSA) (570) 323-6140, mlebeau@wmwa-wsa.org
Wendy Walter	Director of Compliance, Safety & Security, WSA (570) 323-6140, wwalter@wmwa-wsa.org

Site Visits Observations

Site No. 1: Williamsport Streets Department and River Valley Transit Municipal Complex

Address/Location: 1500/1550 W 3rd Street, Williamsport, PA 17701

Relevant Minimum Control Measure (MCM): Pollution Prevention and Good Housekeeping

Entry Time: 9:00 AM (EST)

Exit Time: 11:00 AM (EST)

Table 1.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Scott Jolin	Foreman, City of Williamsport
Bob Schurer	Shop Foreman, River Valley Transit – City of Williamsport
Marcia LeBeau	Environmental Supervisor, Williamsport Sanitary Authority (WSA)
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: The Williamsport Streets Department and River Valley Transit Municipal Complex (hereinafter, Municipal Complex) encompasses approximately 9 acres and is a vehicle fueling, maintenance, and equipment storage facility located in Williamsport, PA. The Municipal Complex includes a bus maintenance building; a paint shop; a garage for storage of city equipment and other vehicles; vehicle washing areas; salt and aggregate storage; a vehicle impound lot; a public-access natural gas fueling station; a gasoline, diesel, and natural gas bus fueling station; an indoor bus storage building; and administrative offices. Stormwater runoff at the site sheet flows via multiple storm drains to the center of the facility and then leaves the facility via a single outlet towards the south of the property. The Municipal Complex is bounded by Lycoming Creek to the west, which is protected by an approximately 50-foot-tall levee.

Permit Appendix A, MCM#6, BMP#2 requires the permittee to “Develop, implement and maintain a written Operations and Maintenance (O&M) program for all operations that could contribute to the discharge of pollutants from the regulated small MS4, as identified under BMP

#1. This program shall address stormwater collection or conveyance systems within the regulated MS4. The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following:

- a. Management practices, policies, procedures, etc. shall be developed and implemented to reduce or prevent the discharge of pollutants to your regulated small MS4s. You should consider eliminating maintenance-area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.
 - b. Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach your regulated small MS4s. You also should review your procedures for maintaining your stormwater BMPs.
 - c. 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 for existing salt storage and distribution sites contained in the PAG-03 NPDES Permit for Stormwater Discharges Associated with Industrial Activity.
 - d. 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) New permittees shall develop and implement a written O&M program by the end of the first year of permit coverage and review and update the program each year thereafter.
 - (2) All permittees must review and update the written O&M program each year of permit coverage, as necessary.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s pollution prevention and good housekeeping at the Municipal Complex.

- 1) The City foreman filled out an inspection checklist that was developed after the October 28-30, 2020 EPA offsite compliance audit to document the Municipal Complex site inspection (refer to Appendix A, Exhibits 1 and 2).
- 2) The EPA Inspection Team observed floor drains in the Public Works building (1550 W 3rd Street). The City foreman stated that the floor drains flow to an oil/water separator, which is cleaned “a few times per year.” The EPA Inspection Team observed numerous small oil stains inside the Public Works building, most of which had been covered with oil absorbent. The City foreman also stated that vehicle washing only occurs inside this building.
- 3) The EPA Inspection Team observed an uncovered scrap metal dumpster outside of the Public Works building with metal overflowing the top of the dumpster (refer to Photographs 1 and 2). The City foreman stated that the dumpster is emptied “every three to four months.” This observation was not noted in the City foreman’s inspection report.

- 4) The EPA Inspection Team observed multiple storm drains at the Municipal Complex. All storm drains contained a significant amount of snow.
- 5) The EPA Inspection Team observed an uncovered five-gallon bucket with an unknown yellow liquid outside of the “American Building,” approximately 30 feet from a storm drain (refer to [Photograph 3](#)). The City foreman stated that he did not know what was in the bucket or why it was uncovered outside. The EPA Inspection Team returned to the area approximately 30-45 minutes later and the bucket was still present. This was not noted in the City foreman’s inspection report.
- 6) The EPA Inspection Team observed one covered asphalt bin and two covered salt bins along the western boundary of the Municipal Complex (refer to [Photograph 4](#)). The roof and walls appeared to be in good condition and there was minimal debris on the ground in front of the covered structure.
- 7) The EPA Inspection Team observed an uncovered vehicle impound area behind the asphalt and salt bins (refer to [Photograph 5](#)). The impound area was fenced and locked. The City foreman stated that this area belongs to the police, but stated that they did not know if vehicle fluids were emptied before vehicles were stored.
- 8) The EPA Inspection Team observed a large amount of scrap materials stored uncovered along the northwestern corner of the Municipal Complex property (refer to [Photographs 5 through 7](#)).
- 9) The EPA Inspection Team observed a public access brush pile between the Municipal Complex and the levee along Lycoming Creek (refer to [Photograph 7](#)).
- 10) The EPA Inspection Team observed a public access compressed natural gas fueling station located near the southwest corner of the Municipal Complex (refer to [Photographs 8 and 9](#)).
- 11) The EPA Inspection Team observed three 55-gallon drums of used oil (refer to [Photograph 10](#)), two partially filled 330-gallon totes containing used oil (refer to [Photograph 11](#)), and one partially filled 330-gallon tote containing diesel exhaust fluid (refer to [Photograph 12](#)) stored inside the “American Building” located in the north central portion of the Municipal Complex. All containers were inside of a covered building but lacked secondary containment. The building had no floor drains. A small oil spill was observed on the floor without oil absorbent (refer to [Photograph 13](#)); however, oil absorbent was available in this building. When asked, City representatives were unsure about what training is provided to employees working in the garages regarding spill prevention and clean up. The EPA Inspection Team recommended training employees and documenting spill and cleanup activities.
- 12) The EPA Inspection Team observed a natural gas processing facility in the center of the Municipal Complex (refer to [Photograph 14](#)). City representatives stated that natural gas used for buses is pulled directly from the ground; the Municipal Complex does not receive shipments of natural gas via truck. The Municipal Complex also contains underground gasoline and diesel tanks.
- 13) The EPA Inspection Team observed an indoor paint booth with no floor drains. City representatives stated that the paint booth had not been used in many years. The EPA Inspection Team did not observe any paint spills on the ground.

- 14) The EPA Inspection Team observed a covered bus fueling station for gasoline and diesel (refer to [Photograph 15](#)). Spills from this area appear they would flow approximately 50 feet southward towards a storm drain in the employee parking lot of the River Valley Transit building. A spill kit was present.
- 15) The EPA Inspection Team observed the bus maintenance building where preventative maintenance such as oil changes are performed (refer to [Photograph 16](#)). The building also contains a bus wash bay (refer to [Photograph 17](#)), bulk motor oil storage (refer to [Photograph 18](#)), battery storage (refer to [Photograph 19](#)), and a large indoor area for overnight bus storage. Floor drains were present throughout the building and City representatives stated all drains flow to an oil/water separator.



Photograph 1. View, facing west, of an uncovered scrap metal dumpster outside of the Public Works building.



Photograph 2. View, facing southeast, of an uncovered scrap metal dumpster outside of the Public Works building.



Photograph 3. View of an uncovered five-gallon bucket with an unknown yellow liquid outside of the “American Building,” approximately 30 feet from a storm drain.



Photograph 4. View, facing west, of one covered asphalt bin and two covered salt bins along the western boundary of the Municipal Complex.



Photograph 5. View, facing southeast, of the uncovered stockpiled materials and the uncovered vehicle impound area. The City foreman stated that the impound belongs to the police, but stated that they did not know if vehicle fluids were emptied before vehicles were stored.



Photograph 6. View, facing east, of stockpiled materials stored uncovered along the northwestern edge of the Municipal Complex property.



Photograph 7. View, facing west, of a public access brush pile between the Municipal Complex and the levee along Lycoming Creek. Also note the stockpiled materials stored uncovered on the Municipal Complex property.



Photograph 8. View, facing west, of a public access compressed natural gas fueling station located near the southwest corner of the Municipal Complex.



Photograph 9. View, facing east, of a public access compressed natural gas fueling station located near the southwest corner of the Municipal Complex.



Photograph 10. View of three 55-gallon drums containing used oil inside of the “American Building.” All containers were inside of a covered building, but lacked secondary containment.



Photograph 11. View of two partially filled 330-gallon totes containing used oil inside of the “American Building.” All containers were inside of a covered building, but lacked secondary containment.



Photograph 12. View of one partially filled 330-gallon tote containing diesel exhaust fluid inside of the “American Building.” All containers were inside of a covered building, but lacked secondary containment.



Photograph 13. View of a small oil spill on the floor without oil absorbent in the “American Building.”



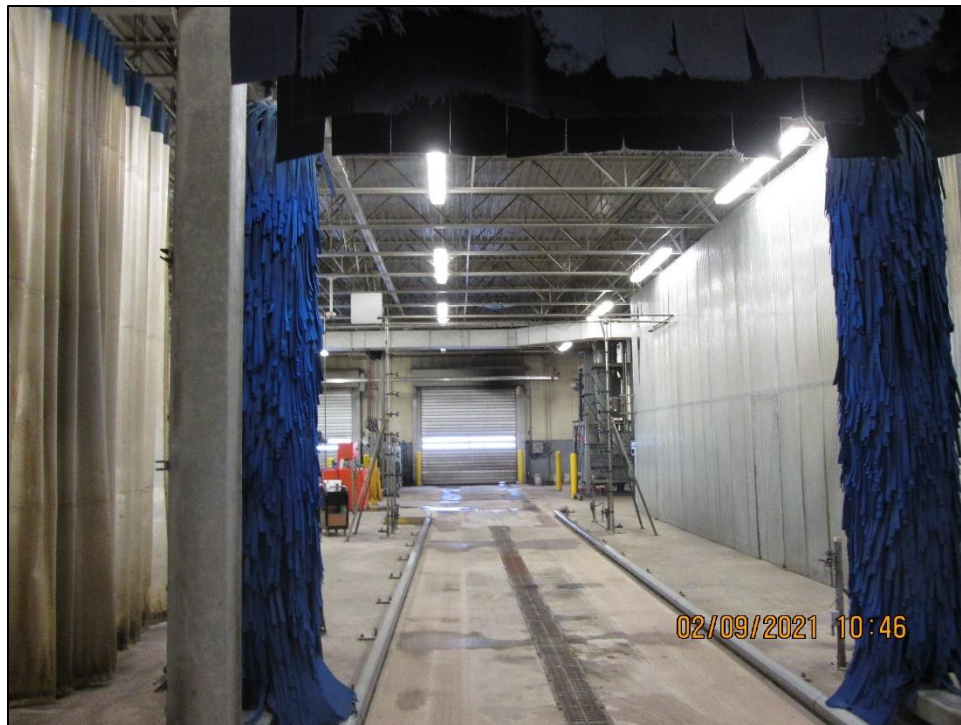
Photograph 14. View, facing east, of the natural gas processing facility in the center of the Municipal Complex. City representatives stated that natural gas used for buses is pulled directly from the ground.



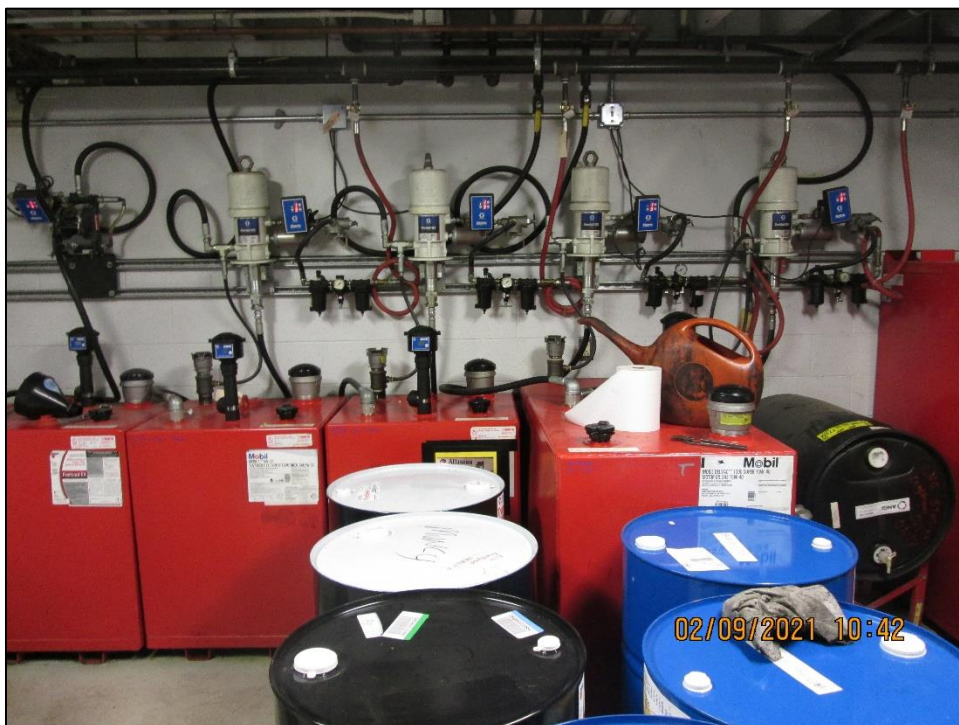
Photograph 15. View, facing east, of a covered bus fueling station for gasoline and diesel. A spill kit was present. Spills from this area would appear to flow downhill southward to a storm drain in the employee parking lot of the River Valley Transit building.



Photograph 16. View of a maintenance area inside the bus maintenance building. City representatives stated that the floor drains flow to an oil/water separator.



Photograph 17. View of the bus wash bay inside the bus maintenance building. City representatives stated the wash bay drains are cleaned monthly and the drains flow to an oil/water separator.



Photograph 18. View of bulk motor oil storage inside the bus maintenance building. The oil is transferred via hoses to the bus maintenance area. This area was inside secondary containment.



Photograph 19. View of the battery storage area inside the bus maintenance building. City representatives stated they have a waste contractor who picks batteries up as needed.

Site No. 2: Outfall LY06

Address/Location: 41°14' 21.0" N, 77° 02' 33.8" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 10:00 AM (EST)

Exit Time: 10:10 AM (EST)

Table 2.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: Outfall LY06 is located directly adjacent to Elm Park and the Williamsport Streets Department and River Valley Transit Municipal Complex. City representatives stated that this is a known NPDES industrial outfall under Permit Number PA0007455 for Lycoming Engines, an airplane part manufacturer. City representatives were unsure if the MS4 also contributed stormwater flow to this outfall.

Permit Appendix A, MCM#3, BMP#4 requires the permittee to “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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall LY06:

- 1) The outfall headwall opens to Lycoming Creek at the bottom of an approximately 50-foot-tall levee. The EPA Inspection Team did not walk down the levee due to safety concerns, but flow was observed leaving the outfall from the top of the levee (refer to [Photograph 20](#)). City representatives stated that there is always a discharge from this outfall, even during dry weather, due to the industrial process water discharge. Permit Number PA0007455 for Lycoming Engines includes several permitted outfalls, one for industrial process water, three for groundwater cleanup discharges, and six stormwater outfalls. At the time of the inspection, it was unclear if any of the Lycoming Engines Outfalls correspond to Outfall LY06 and it was unclear if the observed flow was industrial sourced or from stormwater. A zoomed-in photograph of the outfall showed a short channel with rip rap between the headwall and Lycoming Creek (refer to [Photograph 21](#)).
- 2) City representatives did not complete outfall inspection checklists during the EPA inspection; however, the City provided inspection checklists (dated January 28, 2021) for each of the outfalls visited following the EPA inspection (refer to [Appendix A, Exhibit 3](#)). The inspection checklist made note of dry weather flow during the inspection and stated that the flow was from a recovery well from Lycoming Engines (Permit Number PA0007455), but did not disclose how the origin of the flow was determined.



Photograph 20. View, facing west, of Outfall LY06 to Lycoming Creek. Flow was observed from the outfall.



Photograph 21. Zoomed-in view, facing west, of Outfall LY06. The top of the headwall and the short channel between the outfall and Lycoming Creek are visible.

Site No. 3: Laurel Run Circle – Detention Basin BMP

Address/Location: 174 Laurel Run Circle, Williamsport, PA 17701

Relevant MCM: Post Construction Stormwater Management

Entry Time: 11:15 AM (EST)

Exit Time: 11:30 AM (EST)

Table 3.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Michael Miller	Executive Director, WSA
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: The Laurel Run Circle detention basin was constructed to hold stormwater runoff from the nearby residential area prior to slowly discharging. The privately managed basin

was designed with a stormwater storage area, trash rack, concrete riser outlet structure, outlet pipe, and vegetated buffer along the perimeter. According to site representatives, the detention basin eventually discharges into the receiving water, Laurel Run Creek.

Permit Appendix A, MCM#5, BMP#1 states that the permittee shall, “Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

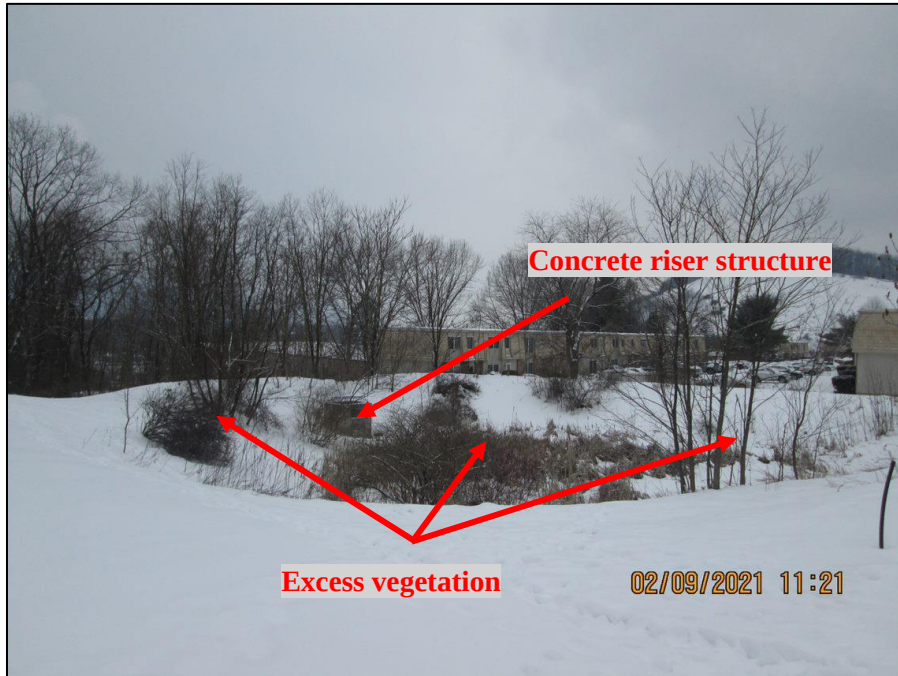
- (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);
- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);

Permit Appendix A, MCM#5, BMP#3 requires the permittee to, “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 new permittees 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. Existing permittees shall update and maintain its current inventory during the term of coverage under the Permit.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s post construction stormwater management at the Laurel Run Circle infiltration basin BMP:

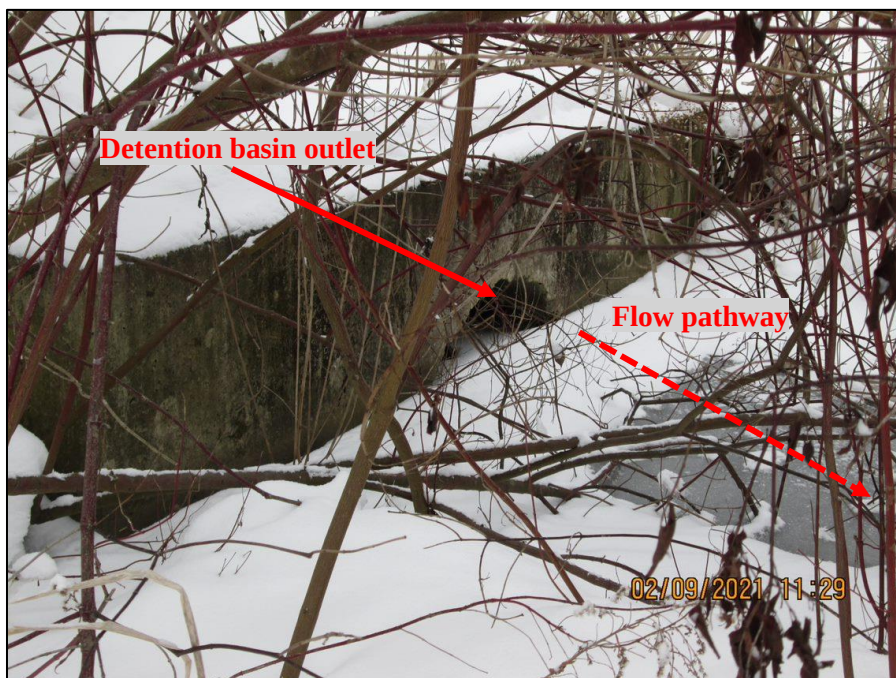
- 1) The EPA Inspection Team observed the detention basin contained excess vegetation within the basin and along the perimeter (refer to Photographs 22 and 23). This same issue was referenced during a routine inspection by the City in May 2019, with instructions to correct the referenced deficiency (refer to Appendix A, Exhibit 4). However, at the time of the inspection, City representatives were unsure if follow-up to the deficiency letter was ever completed.
- 2) The EPA Inspection Team observed the detention basin outlet, concrete riser structure, and trash rack (refer to Photographs 24-26). From what was visible, the structures appeared to be in good condition and no trash was observed.
- 3) After the inspection, the City provided the EPA Inspection Team with an inspection form completed by Mr. Jon Sander, City Engineer (refer to Appendix A, Exhibit 5). The completed form also made note of the excess vegetation within the basin.



Photograph 22. View, facing southwest, of the detention basin from Laurel Run Circle. Note the excess vegetation within and around the perimeter.



Photograph 23. Closer view of the detention basin from Photograph 22. Note the concrete riser structure with trash rack.



Photograph 24. View of the detention basin outlet. Note, due to the snowfall on the ground, the EPA Inspection Team was unable to assess for scouring or erosion.



Photograph 25. Closer view of trash rack located near the BMP's outlet.



Photograph 26. View inside the concrete riser outlet structure. It should be noted there was no observable trash at the time of the inspection.

Site No. 4: Grey Fox Rentals – Subsurface Infiltration Bed; Water Quality Inlet Filters

Address/Location: 2851 S Reach Rd, Williamsport, PA 17701

Relevant MCM: Post Construction Stormwater Management

Entry Time: 11:55 AM (EST)

Exit Time: 12:10 PM (EST)

Table 4.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Michael Miller	Executive Director, WSA
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: The subsurface infiltration bed with water quality inlet filters was constructed beneath the parking lot of Grey Fox Rentals in 2019. This subsurface infiltration stormwater management practice (SMP) was designed to provide for temporary storage and infiltration for stormwater collected from the parking lot. The SMP had a manhole to provide access for maintenance personnel and contained an overflow structure/piping to convey water in case of a

ten-year, 24-hour storm event. Overflow for the SMP is transported to a drainage ditch and towards Daugherty Run.

Permit Appendix A, MCM#5, BMP#1 states that the permittee shall, “Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

- (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);
- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);

Permit Appendix A, MCM#5, BMP#3 requires the permittee to, “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 new permittees 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. Existing permittees shall update and maintain its current inventory during the term of coverage under the Permit.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s post construction stormwater management at the Grey Fox Rentals SMP:

- 1) Due to the nature of the SMP and snowfall in excess of 6 inches covering the ground, the EPA Inspection Team was limited in terms of a visual inspection. However, the EPA Inspection Team was able to observe the primary manhole and access point for the SMP (refer to Photograph 27) as well as the SMP overflow structure (refer to Photograph 28).
- 2) After the inspection, the City provided the EPA Inspection Team with an inspection form completed by Mr. Jon Sander, City Engineer (refer to Appendix A, Exhibit 6). There were no observations or issues of note documented on the inspection form.
- 3) The EPA Inspection Team observed no maintenance issues associated with the manhole. The casing around the overflow structure appeared to be constructed with corrugated plastic and was under a large rock.



Photograph 27. View of the SMP storm drain located in the middle portion of the Grey Fox Rentals parking lot.



Photograph 28. View facing northeast, of the overflow structure for the SMP. Though not observed during the inspection, drainage from the SMP would flow into a drainage ditch and south towards Daugherty Run.

Site No. 5: Outfall DR01

Address/Location: 41° 13' 24.261" N, 77° 4' 17.7702" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 11:55 AM (EST)

Exit Time: 12:10 PM (EST)

Table 5.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Michael Miller	Executive Director, WSA
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: Outfall DR01 is located at the southwest corner of the Grey Fox Rentals SMP. A large levee borders the southern edge of the Grey Fox Rentals SMP. A headwall on the north side of the levee receives stormwater flow from a small ditch from the north as well as from a corrugated pipe from the SMP. The City considers the actual outfall location to be another headwall at the south side of the levee, which flows into another small ditch running south. The small ditch runs south through a wooded area to Daugherty Run and then the West Branch Susquehanna River approximately 900 feet south of the outfall.

Permit Appendix A, MCM#3, BMP#4 requires the permittee to “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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.

- (3) 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall DR01:

- 1) City representatives did not complete outfall inspection checklists during the EPA inspection.
- 2) The EPA Inspection Team observed a headwall at the southwest corner of the Grey Fox Rentals SMP (refer to Photograph 29). The headwall was at the north side of an approximately 50-foot-tall levee. A small ditch running along the west side of the Grey Fox Rentals SMP to the headwall was covered with snow, but no flow was observed. The EPA Inspection Team observed no maintenance issues associated with the headwall or levee.
- 3) The EPA Inspection Team observed the top of the actual outfall headwall from the top of the levee (refer to Photograph 30). The EPA Inspection Team did not walk down the levee due to safety concerns, but no flow was observed from the outfall.



Photograph 29. View, facing south, of the headwall at the southwest corner of the Grey Fox Rentals SMP. This headwall is on the north side of a large levee and Outfall DR01 is on the south side of the levee.



Photograph 30. View, facing south, of the top of the headwall for Outfall DR01. No flow was observed in the unnamed ditch running to the south from the outfall.

Site No. 6: Pace Analytical – Detention Basin

Address/Location: 2829 Reach Rd, Williamsport, PA 17701

Relevant MCMs: Post Construction Stormwater Management

Entry Time: 12:55 PM (EST)

Exit Time: 1:00 PM (EST)

Table 6.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: The Pace Analytical detention basin was constructed to hold stormwater runoff from the busines parking lot with drainage flowing from two stormwater drains. According to a representative from Pace Analytical, the detention basin was constructed in 2011 and is regularly maintained with regular grass mowing services provided by a nearby contractor.

Permit Appendix A, MCM#5, BMP#1 states that the permittee shall, “Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

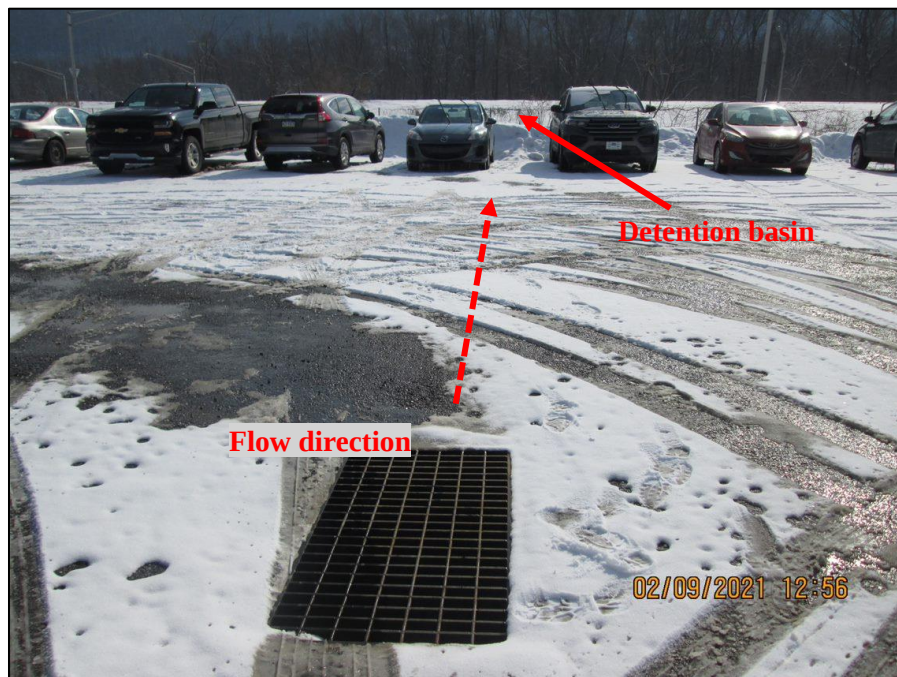
- (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);
- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);

Permit Appendix A, MCM#5, BMP#3 requires the permittee to, “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 new permittees 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. Existing permittees shall update and maintain its current inventory during the term of coverage under the Permit.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s post construction stormwater management at the Pace Analytical detention basin:

- 1) Due to the snowfall in excess of 6 inches covering the ground, the EPA Inspection Team was limited in terms of a visual inspection. However, the EPA Inspection Team was able to observe one storm drain (refer to [Photographs 31 and 32](#)), the detention basin outlet (refer to [Photograph 33](#)), as well as the general layout of the detention basin (refer to [Photograph 34](#)).
- 2) The observed storm drain contained a significant amount of snow (refer to [Photograph 32](#)).
- 3) After the inspection, the City provided the EPA Inspection Team with an inspection form completed by Mr. Jon Sander, City Engineer (refer to [Appendix A, Exhibit 7](#)). There were no observations or issues of note documented on the Inspection form.



Photograph 31. View, facing south, of the storm drain located in the middle of the Pace Analytical back parking lot.



Photograph 32. Closer view inside the storm drain from Photograph 31. Note the presence of snow in the bottom of the drain.



Photograph 33. View of the outlet inside the detention basin. Note the detention basin receives sheet flow coming from the adjacent parking lot.



Photograph 34. View, facing southeast, of the general layout of the detention basin. Note the dotted lines highlighting the embankment boundary.

Site No. 7: WSA West Plant Phase 2 – Rain garden, vegetated swale

Address/Location: 26 Arch Street, Williamsport, PA 17701

Relevant MCM: Post Construction Stormwater Management

Entry Time: 1:05 PM (EST)

Exit Time: 1:15 PM (EST)

Table 7.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: The WSA West Plant vegetated swale was constructed in April 2015, and the rain garden was constructed in June 2016. The vegetated swale conveys discharged stormwater from the rain garden and sheet flow from the paved surfaces on the southwest side of the plant complex. Stormwater from the swale is channeled through a 30-inch stormwater pipe before discharging into the Susquehanna River. The rain garden, which receives sheet flow from the

south and west paved surfaces of the plant complex, was designed with an overflow catch basin to direct excessive flow to the vegetated swale.

Permit Appendix A, MCM#5, BMP#1 states that the permittee shall, “Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

- (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);
- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, 2024 (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees);

Permit Appendix A, MCM#5, BMP#3 requires the permittee to, “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 new permittees 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. Existing permittees shall update and maintain its current inventory during the term of coverage under the Permit.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s post construction stormwater management at the WSA West Plant rain garden and vegetated swale.

- 1) The EPA Inspection Team observed the rain garden located in the southwestern corner of the complex (refer to Photograph 35). Due to the snow on the ground, the team was unable to inspect for trash or debris. City representatives stated there have not been any trash issues in the past, but did express interest in how to manage the rain garden vegetation in terms of pruning, clearing dead vegetation, etc. City representatives also stated that the grass is cut weekly (seasonally).
- 2) The EPA Inspection Team observed the concrete riser structure located in the middle of the vegetated swale (refer to Photograph 36). There was no visible trash in or around the structure at the time of the inspection and it appeared to be in good condition.
- 3) After the inspection, the City provided the EPA Inspection Team with an inspection form completed by Mr. Jon Sander, City Engineer (refer to Appendix A, Exhibit 8). There were no observations or issues of note documented on the inspection form. Additionally, the City provided the EPA Inspection Team with the following documents related to the BMPs (refer to Appendix A, Exhibits 9 through 11):

- Long Term Operations & Maintenance Plan for the WSA West Plant BMPs
- Routine quarterly inspection records (May 2020 – January 2021)
- 2020 Annual Inspection Form



Photograph 35. View, facing south, of the WSA rain garden located in the southwestern corner of the complex.



Photograph 36. View, facing southwest, of the concrete riser structure located in the middle of the vegetated swale. The riser contains the 30-inch stormwater pipe that conveys stormwater through the levee and into the Susquehanna River.

Site No. 8: Outfall WB01

Address/Location: 41° 13' 25.2006" N, 77° 3' 24.39" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 1:35 PM (EST)

Exit Time: 1:40 PM (EST)

Table 8.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: Outfall WB01 is located approximately 200 feet north of the West Branch Susquehanna River and just south of the Susquehanna Beltway. A large levee runs along the West Branch Susquehanna River just north of the outfall. Fox Hollow Run runs southward underneath the Susquehanna Beltway, through the levee, and contributes flow to Outfall WB01. The actual outfall consists of a large headwall with three pipe flap gates. A wide ditch connects the outfall to the West Branch Susquehanna River.

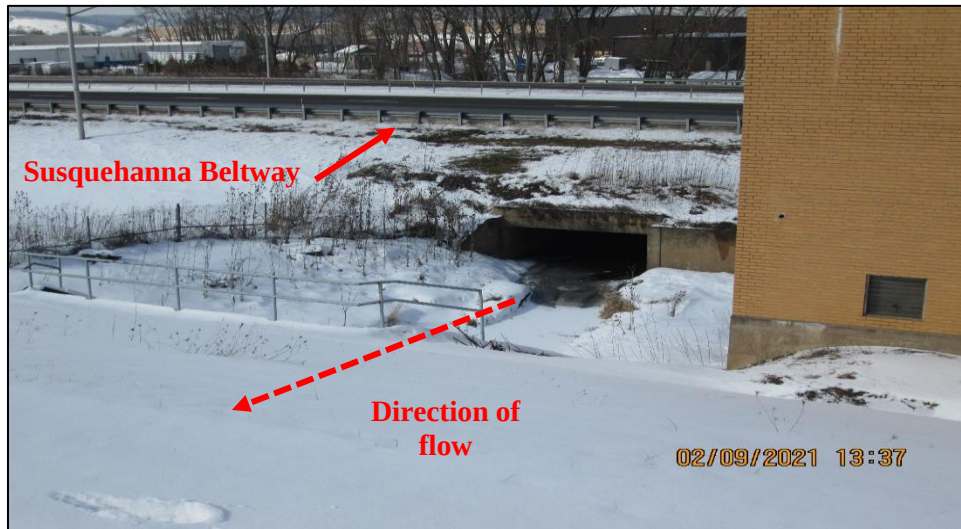
Permit Appendix A, MCM#3, BMP#4 requires the permittee to “conduct dry weather screenings of its MS4 outfalls and observation points to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall WB01:

- 1) City representatives did not complete outfall inspection checklists during the EPA inspection; however, the City provided inspection checklists (dated January 28, 2021) for each of the outfalls visited following the EPA Inspection (refer to [Appendix A, Exhibit 3](#)). According to the inspection checklist, Outfall WB01 receives flow from Fox Hollow Run as well as permitted entities General Cable (Permit Number PA0009318) and Penn Recycling Inc. (Permit Number PAR604841).
- 2) The EPA Inspection Team observed Fox Hollow Run flowing through a subsurface channel beneath the Susquehanna Beltway (refer to [Photograph 37](#)). Fox Hollow Run subsequently runs through a large levee to Outfall WB01.
- 3) The EPA Inspection Team observed the ditch between Outfall WB01 and the West Branch Susquehanna River (refer to [Photograph 38](#)) from the top of the levee. The surface of the ditch was frozen and covered in snow, but some rip rap was observed in the upstream half of the ditch.
- 4) The EPA Inspection Team observed the large headwall containing Outfall WB01 (refer to [Photograph 39](#)). The headwall contained three pipe flap gates opening to a small notched weir, which subsequently flowed to the ditch to the West Branch Susquehanna River. Flow was observed from the bottom of the central pipe flap gate. City representatives stated that there is always a discharge from this outfall due to the proximity to Fox Hollow Run, but did not state if formal tracing had been performed to confirm this. Additionally, the City’s outfall inspection checklist (dated January 28, 2021) for this outfall did not state if formal tracing had been performed (refer to [Appendix A, Exhibit 3](#)). City representatives also stated that permitted entities (General Cable and Penn Recycling Inc.) contribute flow to this outfall. EPA Inspection Team observed no maintenance issues associated with the headwall or weir.



Photograph 37. View, facing northwest, of Fox Hollow Run flowing through a subsurface channel beneath the Susquehanna Beltway towards the levee and Outfall WB01.



Photograph 38. View, facing south, of the top of the headwall for Outfall WB01. Rip rap was observed in the ditch between the outfall and the West Branch Susquehanna River.



Photograph 39. View, facing northwest, of the Outfall WB01 headwall. The EPA Inspection Team observed three pipe flap gates with flow from the central pipe.

Site No. 9: Outfall WB10

Address/Location: 41° 13' 49.5" N, 77° 01' 09.0" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 2:15 PM (EST)

Exit Time: 2:20 PM (EST)

Table 9.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: Outfall WB10 is located approximately 20 feet north of the West Branch Susquehanna River and just south of the intersection of the Susquehanna Beltway and the

Maynard Street Bridge. The end of pipe is located underneath the Maynard Street Bridge and flow crosses a small bike path via a grate. City representatives stated that they normally see discharge from this outfall and that they believe this is part of an industrial NPDES outfall (PA0008575) from a facility named “Wire Rope;” however, the City’s outfall inspection checklist (dated January 28, 2021) for this outfall states that no flow was present at the time of that inspection (refer to [Appendix A, Exhibit 3](#)). City representatives did not state if formal tracing had been performed at this outfall at the time of the EPA inspection.

Permit Appendix A, MCM#3, BMP#4 requires the permittee to “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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall WB10:

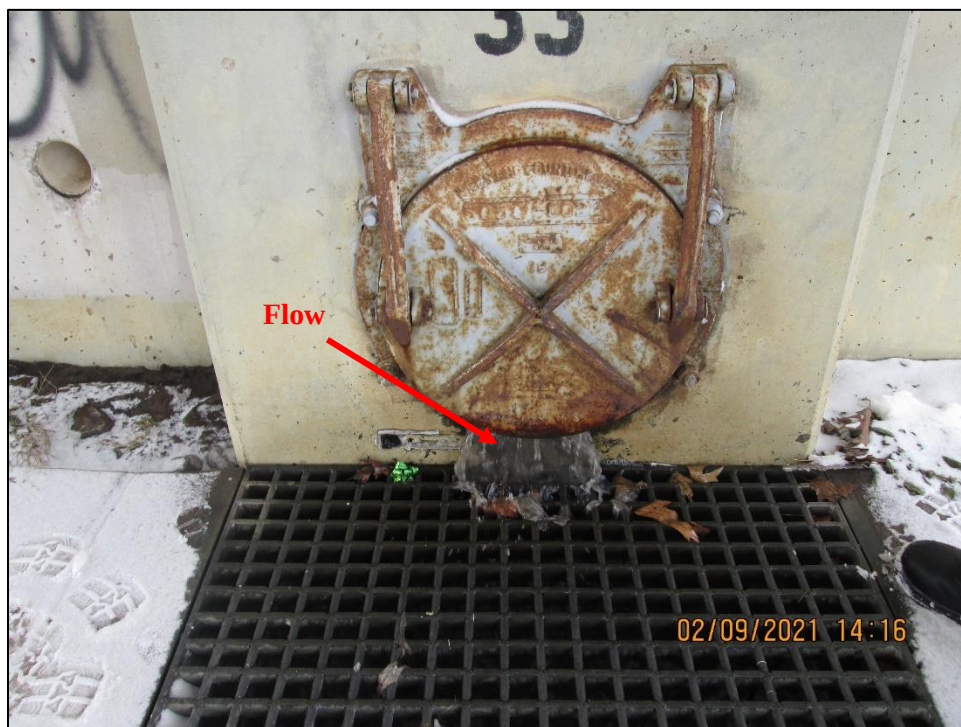
1. City representatives did not complete outfall inspection checklists during the EPA inspection; however, the City provided inspection checklists (dated January 28, 2021) for each of the outfalls visited following the EPA Inspection (refer to [Appendix A, Exhibit 3](#)). There were no observations or issues of note documented on the inspection form.
2. The EPA Inspection Team observed flow from the end of pipe for Outfall WB10 (refer to [Photograph 40 and 41](#)). City representatives stated that they normally see discharge from this outfall and that they believe this is part of an industrial NPDES outfall from a facility called “Wire Rope;” however, the City’s outfall inspection checklist (dated January 28, 2021) for this outfall stated that no flow was present at the time of that inspection (refer to [Appendix A, Exhibit 3](#)). City representatives did not state if formal tracing had been

performed at this outfall at the time of the EPA inspection. The EPA Inspection Team observed no maintenance issues associated with the outfall.

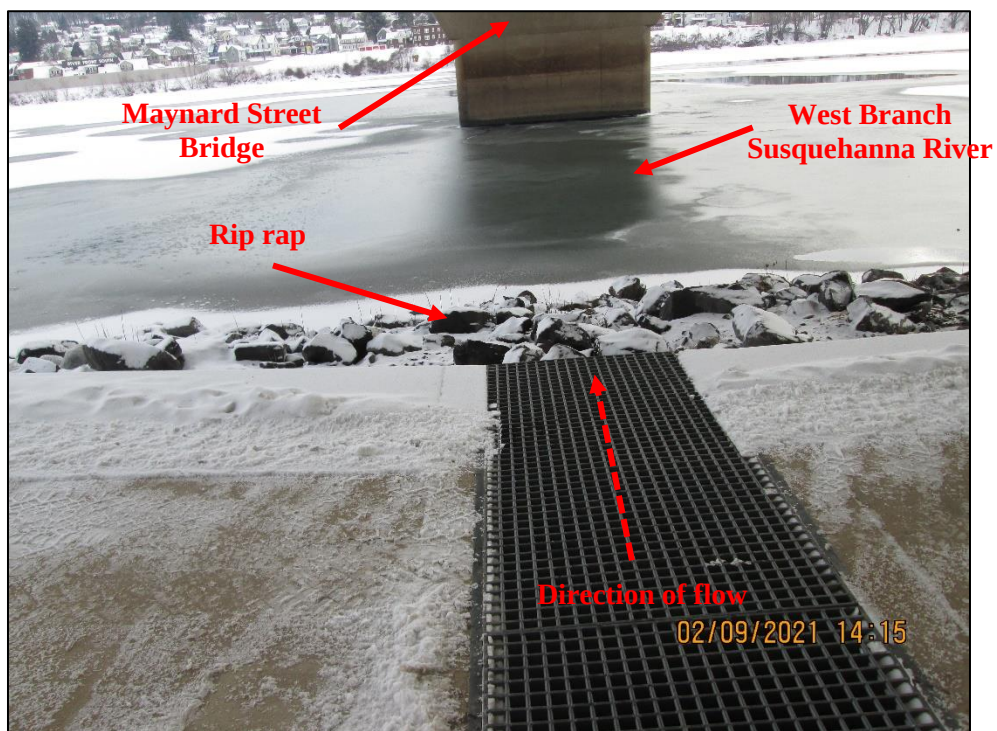
3. The EPA Inspection Team observed that flow from the outfall flows via a small grate under the bike path approximately 20 feet south to the West Branch Susquehanna River (refer to [Photograph 42](#)). Rip rap was observed at the end of the grate to the West Branch Susquehanna River.



Photograph 40. View, facing northeast, of Outfall WB10. Flow was observed at the bottom of a pipe flap gate.



Photograph 41. Zoomed-in view facing north, of Outfall WB10. City representatives stated that they normally see discharge from this outfall and that they believe it is part of an industrial NPDES outfall from a facility called “Wire Rope.”



Photograph 42. View, facing south, of the small grate between Outfall WB10 and the West Branch Susquehanna River.

Site No. 10: Outfall WB18

Address/Location: 41° 14' 27.942" N, 76° 59' 37.5966" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 2:40 PM (EST)

Exit Time: 2:45 PM (EST)

Table 10.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

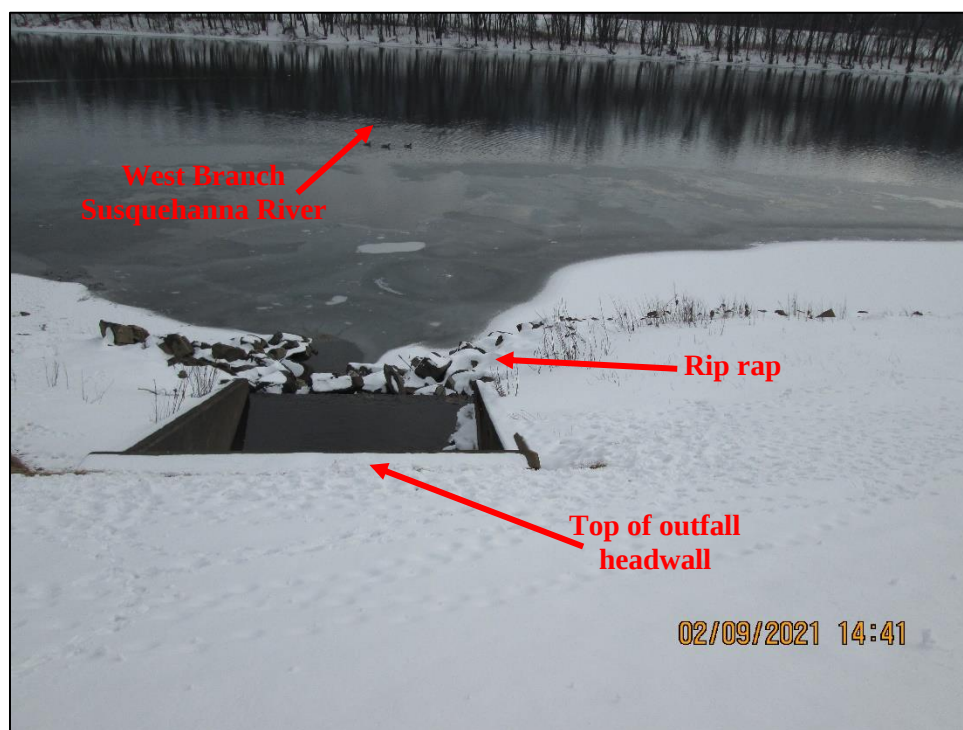
Site Description: Outfall WB18 is located adjacent to the West Branch Susquehanna River just south of the Susquehanna Beltway, a set of railroad tracks, and a large levee. The outfall consists of a single pipe with a flap gate and a large headwall.

Permit Appendix A, MCM#3, BMP#4 requires the permittee to “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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall WB18:

1. City representatives did not complete outfall inspection checklists during the EPA inspection; however, the City provided inspection checklists (dated January 28, 2021) for each of the outfalls visited following the EPA Inspection (refer to Appendix A, Exhibit 3). There were no observations or issues of note documented on the inspection form.
2. The EPA Inspection Team observed a large headwall adjacent to the West Branch Susquehanna River (refer to Photograph 43). The outfall consisted of a single pipe flap gate with rip rap at the base of the headwall (refer to Photograph 44 and 45). Flow was observed from the outfall at the time of the EPA inspection. City representatives stated that an unnamed creek contributes to this outfall and is piped beneath the levee to the outfall headwall. The EPA Inspection Team observed no maintenance issues associated with the outfall.



Photograph 43. View, facing southeast, of the top of the headwall associated with Outfall WB18. This outfall flows under a large levee bordering the West Branch Susquehanna River.



Photograph 44. View, facing west, of the pipe flap gate for Outfall WB18. Flow was observed from the outfall. City representatives stated that an unnamed creek contributes to this outfall, so flow is expected.



Photograph 45. View, facing southwest, of rip rap at the end of the Outfall WB18 headwall.

Site No. 11: Outfall WB19

Address/Location: 41° 14' 36.5" N, 76° 59' 18.9" W

Relevant MCM: Illicit Discharge Detection and Elimination (IDD&E)

Entry Time: 2:55 PM (EST)

Exit Time: 3:00 PM (EST)

Table 11.1. Site Visit Participants

Name	Title/Affiliation
Jon Sander	Engineer, City of Williamsport
Marcia LeBeau	Environmental Supervisor, WSA
Wendy Walter	Director of Compliance, Safety & Security, WSA
Jeff Hakes	Field Technician, WSA
Taylor Fontaine	Inspector, PG Environmental
Cassidy Owen	Inspector, ERG
Rebecca Serfass	Inspector, EPA Region 3

Site Description: Outfall WB19 is located adjacent to the West Branch Susquehanna River just south of a levee and a wastewater treatment plant. Outfall WB19 is located approximately 1,000 feet to the northeast of Outfall WB18. The outfall consists of a single pipe with a flap gate and a headwall.

Permit Appendix A, MCM#3, BMP#4 requires the permittee to “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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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

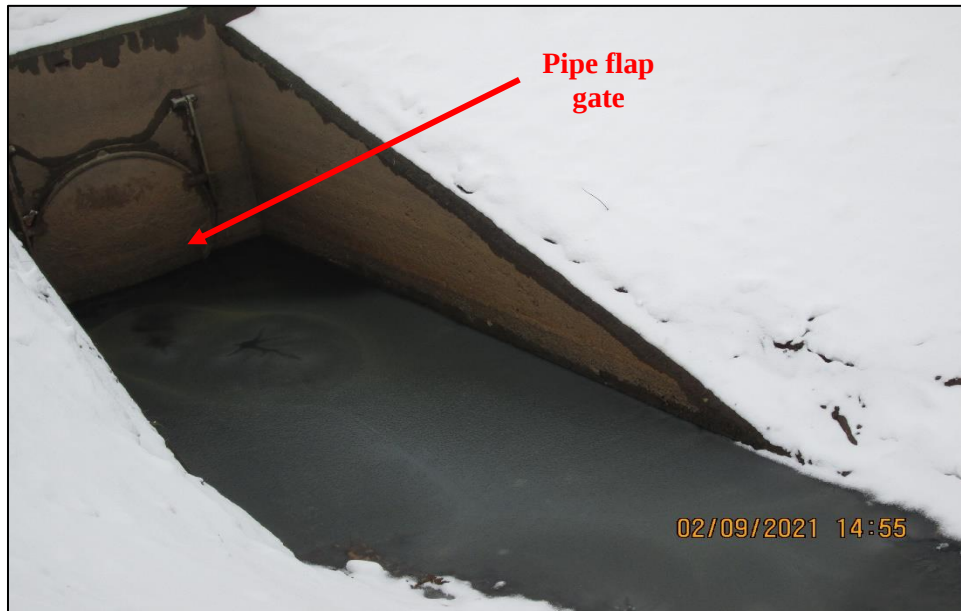
that result in deposits in the receiving water or produce an observable change in the color, odor or turbidity of the receiving water.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the City’s illicit discharge detection and elimination at Outfall WB19:

1. City representatives did not complete outfall inspection checklists during the EPA inspection; however, the City provided inspection checklists (dated January 28, 2021) for each of the outfalls visited following the EPA Inspection (refer to Appendix A, Exhibit 3). There were no observations or issues of note documented on the inspection form.
2. The EPA Inspection Team observed a headwall adjacent to the West Branch Susquehanna River (refer to Photograph 46). The outfall was partially submerged (refer to Photograph 47), and the surface of the water was frozen, but a small amount of flow was observed in the ditch between the outfall and the West Branch Susquehanna River. City representatives stated that an unnamed creek contributes to this outfall and is piped beneath the levee to the outfall headwall. The EPA Inspection Team observed no maintenance issues associated with the outfall.



Photograph 46. View, facing northwest, of Outfall WB19 at the base of a levee. This outfall flows to a small ditch running to the West Branch Susquehanna River.



Photograph 47. View, facing north, of the pipe flap gate for Outfall WB19. The outfall was partially submerged, and the surface of the water was frozen, but a small amount of flow was observed in the ditch downstream of the outfall.

Appendix A

Exhibit Log

Exhibit 1

City of Williamsport Municipal Complex Inspection Checklist (Dated February 9, 2021)



City of Williamsport – MS4 Facilities Inspection Form



Inspector(s) Scott Jolin

Insp Date 2-5-2021

Location 1550 West Third St
Williamsport Streets and Parks facility

Note: perform inspection quarterly, at minimum

		No.	INSPECTION ITEM	YES	NO	N/A
GENERAL	1.	A.	Are the floors and interior storage areas clean?	X		
		B.	Are the floor drains clean and free of debris?	X		
		C.	Is the oil/water separator being properly maintained?	X		
		D.	Are the surrounding grounds and paved areas free of leaks, spills trash and other debris?	X		
VEHICLE	2.	A.	Are equipment and vehicles being stored indoors or under roof when possible?	X		
		B.	Is vehicle maintenance only being conducted indoors?	X		
		C.	Is vehicle washing only being conducted in the designated wash bay?		X	
		D.	Are equipment and vehicles free from leaks and drips?		X	
PARTS	3.	A.	Is the parts washer clean with no signs of leaks, drips or spills?	X		
		B.	Is the parts washer lid kept closed when not in use and the sign posted?	X		
CHEMICALS	4.	A.	Are chemical drums and containers labeled according to their contents?	X		
		B.	Are chemical drums and containers in good condition, closed and not stored outdoors?	X	X	
		C.	Are open chemical drums and containers stored in a secondary containment?	X	X	
		D.	Are chemical drums and containers stored away from doorways?		X	
		E.	Are chemical drums and containers clean and free of leaks, drips or spills?		X	
		F.	Are absorbent materials stocked and readily available near chemical storage locations?	X		
		G.	Are spill clean-up materials being disposed of properly?	X		
		H.	Are the flame-resistant cabinets organized and free of spills and leaks?			
		I.	Are the Material Data Safety Sheets/Safety Data Sheets for the chemicals onsite available and easily accessible?	X		
		J.	Are chemical storage shelves organized and free from stains and spills?			
STORAGE	5.	A.	Are the outdoor bulk storage tanks clean and free of leaks, drips or spills?			X
		B.	Are bulk storage tanks labeled according to their contents?			X
		C.	Are secondary containment units retaining accumulated storm water?			X
		D.	Are the secondary containment units free of debris, oil sheen or other signs of contamination?			X
		E.	Are the secondary containment units in good condition without signs of deterioration or cracks?			X
		F.	Are the tanks secured from unauthorized use and vandalism?			X
		G.	Are absorbent materials stocked and readily available near bulk storage tanks?			X
TRASH	6.	A.	Is the area around the dumpsters free of trash or other debris?	X	X	
		B.	Are the trash dumpsters covered or the lids closed?	X		
		C.	Are the dumpsters free of leaks, spills or overflow?	X		
CONTAIN	7.	A.	Have empty drums/containers or chemicals that are no longer being used been removed, recycled or disposed of properly?	X		
		B.	Are recycled drums/containers labeled as "Empty" or according to their reuse?		X	
STOCKPILE	8.	A.	Are material stockpiles (sand, road salt, asphalt) stored in designated areas?	X		
		B.	Are the stockpiles pushed back from the surrounding areas?	X		
		C.	Are materials isolated from stormwater conveyances?	X		
		D.	Are the stormwater inlets free of debris and other accumulated materials?	X		
WASTE	9.	A.	Are Universal Waste products (batteries, pesticides, mercury-containing equipment or bulbs/lamps) being collected, stored and ultimately recycled?	X		
		B.	Is the Universal Waste labeled appropriately with contents and start date?			
		C.	Are the containers in good condition and closed at all times unless adding waste?			

If None, indicate as such ("None" or "N/A")

- *1A They could be swept up more often.
- *1C Don't think we have one. Are drains go into the sewer and get treated at the sewage treatment Plant.
- *2D Sometimes the big trucks have hydraulic leaks after plowing. When we notice them we try to fix the problem with putting on new connections.
- *4C they are not stored in a Secondary Containment. Will have to look into making that happen.
- *4E They have some wetness on them and. To fix the problem will have to have the guys whip them down and clean up anything on the floor around them.
- *4F I will have to put bags of absorbent by all doors
- *5 We don't have outdoor bulk storage.
- *6A We do have tires and pallets and other things by the dumpster sometimes, but they get taken to the landfill for proper disposal.
- *7B Some things aren't labeled but will have to get a stencil to paint on them to make sure.

Inspector(s) SIGNATURE Scott Jolin (typed in by Jon Sander)

Insp Date 2-5-2021

Location See pg 1

Exhibit 2

City of Williamsport River Valley Transit Facility Inspection Checklist (Dated February 9, 2021)



City of Williamsport – MS4 Facilities Inspection Form



Inspector(s) Bol Schurer

Insp Date 2-5-21

Location River Valley Transit 1500 W 5th ST

Note: perform inspection quarterly, at minimum

		No.	INSPECTION ITEM	YES	NO	N/A
GENERAL	1.	A.	Are the floors and interior storage areas clean?	X		
	B.	Are the floor drains clean and free of debris?	X			
	C.	Is the oil/water separator being properly maintained?	X			
	D.	Are the surrounding grounds and paved areas free of leaks, spills trash and other debris?	X			
VEHICLE	2.	A.	Are equipment and vehicles being stored indoors or under roof when possible?	X		
	B.	Is vehicle maintenance only being conducted indoors? <i>Tire Press + some Farber Maint</i>	X			
	C.	Is vehicle washing only being conducted in the designated wash bay? <i>only b.r outside</i>	X			
	D.	Are equipment and vehicles free from leaks and drips? <i>As Much As Possible</i>	X			
PARTS	3.	A.	Is the parts washer clean with no signs of leaks, drips or spills?	X		
	B.	Is the parts washer lid kept closed when not in use and the sign posted?			X	
CHEMICALS	4.	A.	Are chemical drums and containers labeled according to their contents?	X		
	B.	Are chemical drums and containers in good condition, closed and not stored outdoors?	X			
	C.	Are open chemical drums and containers stored in a secondary containment? <i>Flamproof cabinet</i>	X			
	D.	Are chemical drums and containers stored away from doorways?	X			
	E.	Are chemical drums and containers clean and free of leaks, drips or spills?	X			
	F.	Are absorbent materials stocked and readily available near chemical storage locations?	X			
	G.	Are spill clean-up materials being disposed of properly?	X			
	H.	Are the flame-resistant cabinets organized and free of spills and leaks?	X			
	I.	Are the Material Data Safety Sheets/Safety Data Sheets for the chemicals onsite available and easily accessible?	X			
	J.	Are chemical storage shelves organized and free from stains and spills?	X			
STORAGE	5.	A.	Are the outdoor bulk storage tanks clean and free of leaks, drips or spills?	X		X
	B.	Are bulk storage tanks labeled according to their contents?	X			
	C.	Are secondary containment units retaining accumulated storm water?			NA	
	D.	Are the secondary containment units free of debris, oil sheen or other signs of contamination?			X	
	E.	Are the secondary containment units in good condition without signs of deterioration or cracks?			X	
	F.	Are the tanks secured from unauthorized use and vandalism?			X	
	G.	Are absorbent materials stocked and readily available near bulk storage tanks?	X			
TRASH	6.	A.	Is the area around the dumpsters free of trash or other debris?	X		
	B.	Are the trash dumpsters covered or the lids closed?	X			
	C.	Are the dumpsters free of leaks, spills or overflow?	X			
CONTAIN	7.	A.	Have empty drums/containers or chemicals that are no longer being used been removed, recycled or disposed of properly?	X		
	B.	Are recycled drums/containers labeled as "Empty" or according to their reuse?	X			
STOCKPILE	8.	A.	Are material stockpiles (sand, road salt, asphalt) stored in designated areas?	X		
	B.	Are the stockpiles pushed back from the surrounding areas?			X	
	C.	Are materials isolated from stormwater conveyances?	X			
	D.	Are the stormwater inlets free of debris and other accumulated materials?			X	
WASTE	9.	A.	Are Universal Waste products (batteries, pesticides, mercury-containing equipment or bulbs/lamps) being collected, stored and ultimately recycled?	X		
	B.	Is the Universal Waste labeled appropriately with contents and start date?	X			
	C.	Are the containers in good condition and closed at all times unless adding waste?	X			

If None, indicate as such ("None" or "N/A")

This image shows a single page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Location See pg 1

Exhibit 3

City of Williamsport Outfall Screening Reports (Dated January 28, 2021)



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PA1134813
Date of Inspection: 1/28/21 @ 2:30 PM	Outfall ID No.: WB01
Land Uses in Outfall Drainage Area (Select All):	Latitude: N 41° 22'36.67"
☒ Industrial ☐ Urban Residential	Longitude: W - 77° 05'6.775"
☒ Commercial ☐ Suburban Residential	Dry Weather Inspection? ☒ Yes ☐ No
☐ Open Space ☐ Other:	Date of Previous Precipitation: 1/26/21 @ 2:15 PM
Inspector Name(s): Drew Zimmerman / Jeff Hakes	Amount of Previous Precipitation: 0.15 in
	Were Photographs Taken? ☒ Yes ☐ No
	Are Photographs Attached? ☒ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☒ RCP ☐ CMP ☐ PVC ☐ HDPE ☒ Steel ☐ Other	☒ Circular ☐ Single ☐ Elliptical ☐ Double ☐ Box ☒ Triple ☐ Other ☐ Other	Diameter: 60 in	☐ In Water ☐ With Sediment
☒ Open Channel on Before Levee System Fox Hollow Run	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: X in Top Width: 1 in Bottom Width: 1 in	

Dry Weather Flow Present at Outfall During Inspection? ☒ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☒ Moderate ☐ Significant ☐ N/A **Fox Hollow Run**

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☒ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☒ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☒ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☒ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☒ Yes ☐ No (If Yes, No. Samples: 1)

FIELD/LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH	8.30	S.U.	COD		mg/L
Total Residual Chlorine (TRC)	0.02 F 0.03 T	mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: Temp	0.9 °C	°C	Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☒ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

Inspector Comments: This outfall is Fox Hollow Rd. General Cable and Penn Recycling are permitted by DEP.
General Codes: PA009318 Penn Recycling: PAR604841

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Don Zimmerman

Responsible Official Name

[Signature]

Signature

1-29-21

Telephone No.

Date



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PA1134813
Date of Inspection: 1/28/21 @ 3:00 PM	Outfall ID No.: WB10
Land Uses in Outfall Drainage Area (Select All): ☒ Industrial ☒ Urban Residential ☒ Commercial ☐ Suburban Residential ☐ Open Space ☐ Other:	Latitude: 41 ° 23 04 27 " Longitude: 77 ° 01 91 61 " Dry Weather Inspection? ☒ Yes ☐ No Date of Previous Precipitation: 1/26/21 @ 2:45 PM Amount of Previous Precipitation: 0.15 in
Inspector Name(s): Drew Zimmerman / Jeff Hahn	Were Photographs Taken? ☒ Yes ☐ No Are Photographs Attached? ☒ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☒ RCP ☐ CMP ☐ PVC ☐ HDPE ☒ Steel ☐ Other	☒ Circular ☒ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: 18 in	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☐ Yes ☒ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☐ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☐ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☐ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☐ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☐ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☐ Yes ☐ No (If Yes, No. Samples: _____)

FIELD / LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH		S.U.	COD		mg/L
Total Residual Chlorine (TRC)		mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: _____			Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☐ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

Inspector Comments:

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Drew Zimmerman

Responsible Official Name

Signature

1-29-21

Telephone No.

Date



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PA1134813
Date of Inspection: 1/28/21 @ 2:45	Outfall ID No.: L406
Land Uses in Outfall Drainage Area (Select All): ☒ Industrial ☒ Urban Residential ☒ Commercial ☐ Suburban Residential ☐ Open Space ☐ Other:	Latitude: 41° 23' 17.3" N Longitude: - 77° 04' 27.10" W Dry Weather Inspection? ☒ Yes ☐ No Date of Previous Precipitation: 1/26/21 @ 2:15 PM Amount of Previous Precipitation: 0.15 in
Inspector Name(s): Drew Zimmerman / Jeff Itakes	Were Photographs Taken? ☒ Yes ☐ No Are Photographs Attached? ☒ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☒ RCP ☐ CMP ☐ PVC ☐ HDPE ☒ Steel ☐ Other	☒ Circular ☒ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: 48 in	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☒ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☒ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☒ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☒ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☒ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☒ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☒ Yes ☐ No (If Yes, No. Samples: 1)

FIELD/LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH	8.09	S.U.	COD		mg/L
Total Residual Chlorine (TRC)	<0.02 <0.02	mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: <u>Temp</u>	10.0	°C	Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☒ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

Inspector Comments:

The flow was from one of Lycoming Engines (PA0007455) recovery wells.

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Drew Zimmerman

Responsible Official Name

Signature

[Signature]
1-27-21

Telephone No.

Date



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DEPARTMENT OF ENVIRONMENTAL
PROTECTION

MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PAI134813
Date of Inspection: 1/28/21 3:08 PM	Outfall ID No.: WB18
Land Uses in Outfall Drainage Area (Select All): ☐ Industrial ☒ Commercial ☐ Open Space	Latitude: 41° 24' 09.5" Longitude: - 76° 94' 37.7" Dry Weather Inspection? ☒ Yes ☐ No Date of Previous Precipitation: _____ Amount of Previous Precipitation: _____ in
☒ Urban Residential ☐ Suburban Residential ☐ Other:	Were Photographs Taken? ☒ Yes ☐ No Are Photographs Attached? ☒ Yes ☐ No
Inspector Name(s): Drew Zimmerman / Jeff Hahn	

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☒ RCP ☐ CMP ☐ PVC ☐ HDPE ☒ Steel ☐ Other	☒ Circular ☒ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: 84 in	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☒ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☒ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☒ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☒ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☒ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☒ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☒ Yes ☐ No (If Yes, No. Samples: 1)

FIELD/LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH	7.65	S.U.	COD		mg/L
Total Residual Chlorine (TRC)	0.03 F 0.107	mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: Temp	5.1	°C	Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☐ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

Inspector Comments:

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Responsible Official Name

Signature

Telephone No.

Date



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PA1134813
Date of Inspection: 1/28/21 3:35	Outfall ID No.: WB19
Land Uses in Outfall Drainage Area (Select All):	Latitude: 41° 24' 34.73" N
☐ Industrial ☒ Urban Residential	Longitude: - 76° 9' 88.576" W
☒ Commercial ☐ Suburban Residential	Dry Weather Inspection? ☒ Yes ☐ No
☒ Open Space ☐ Other:	Date of Previous Precipitation:
Inspector Name(s): Orew Zimmerman / Jeff Hake	Amount of Previous Precipitation: in
	Were Photographs Taken? ☐ Yes ☐ No
	Are Photographs Attached? ☐ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other	☒ Circular ☐ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: 48 in	☒ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☒ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☒ Trickle ☐ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☒ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☒ Yes ☐ No If Yes, provide a description below.

Musty

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☒ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☒ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☒ Yes ☐ No (If Yes, No. Samples: 3)

FIELD / LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH	6.72	S.U.	COD		mg/L
Total Residual Chlorine (TRC)	2.037	mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: Temp	6.3	°C	Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☐ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

Inspector Comments:

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Responsible Official Name

Signature

Telephone No.

Date



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION				
Permittee Name: City of Williamsport Joint Client		NPDES Permit No.: PA1134813		
Date of Inspection: 1/28/21 4:03		Outfall ID No.: WB21		
Land Uses in Outfall Drainage Area (Select All):		Latitude: 41° 24' 56.08"		
☐ Industrial ☐ Urban Residential ☒ Commercial ☒ Suburban Residential ☒ Open Space ☐ Other:		Longitude: - 76° 9' 25.18"		
		Dry Weather Inspection? ☐ Yes ☐ No		
		Date of Previous Precipitation:		
		Amount of Previous Precipitation: in		
Inspector Name(s): Drew Zimmerman / Jeff Hahn		Were Photographs Taken? ☒ Yes ☐ No		
		Are Photographs Attached? ☒ Yes ☐ No		
OUTFALL DESCRIPTION				
TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☒ Closed Pipe	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other	☐ Circular ☐ Single ☐ Elliptical ☒ Double ☒ Box ☐ Triple ☐ Other ☐ Other	Diameter: _____ in 72" x 72" x 72"	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	
Dry Weather Flow Present at Outfall During Inspection? ☒ Yes ☐ No (If No, skip to Certification Section)				
Description of Flow Rate: ☐ Trickle ☒ Moderate ☐ Significant ☐ N/A				
DRY WEATHER FLOW EVALUATION				
Does the dry weather flow contain color? ☐ Yes ☒ No If Yes, provide a description below.				
Does the dry weather flow contain an odor? ☐ Yes ☐ No If Yes, provide a description below.				
Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☒ No If Yes, provide a description below.				
Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☒ No If Yes, provide a description below.				

Were sample(s) collected of the dry weather flow? ☐ Yes ☐ No (If Yes, No. Samples: _____)

FIELD / LABORATORY ANALYSIS

PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH	8.06	S.U.	COD		mg/L
Total Residual Chlorine (TRC)	<0.02 F <0.02 T	mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: Temp	1.2	°C	Oil and Grease		mg/L
Other: _____			Other: _____		

Indicate the parameters above that were analyzed by a DEP-certified laboratory:

ILLICIT DISCHARGES

Is the dry weather flow an illicit discharge? ☐ Yes ☒ No

If Yes, describe efforts made to determine the source(s) of the illicit discharge.

Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.

The McClure Ave

Inspector Comments:

RESPONSIBLE OFFICIAL CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Drew Zimmerman

Responsible Official Name

Signature

1/29/21

Telephone No.

Date

Exhibit 4

Laurel Run Circle BMP Inspection Maintenance Notice

City of Williamsport
Department of Community & Economic Development
□◆□

July 22, 2019

Mr. Robert Yoder
The Yoder Group, Inc.
Turbotville, Pa.

Re: Maintenance of detention pond
City of Williamsport, Lycoming County, PA

Dear Mr. Yoder,

On May 30, 2019 I conducted a routine inspection of the large detention pond which is located on the Western side of the development at Pennsy Heights. Upon speaking with some neighbors and through my own observations, my findings are as follows. All concrete structures are in very good condition and appear to be operational. I did find some excess vegetation throughout as well as light debris which appears to have come from surrounding houses.

Please correct the above referenced deficiencies and respond by 30 August, 2019.

Please let me know if you have any questions.

Regards,



Mark J. Benner
City Engineer

Exhibit 5

City of Williamsport Laurel Run Circle BMP Inspection Checklist (Dated February 9, 2021)

Stormwater BMP Owner Inspection Form Infiltration Basin

Address: 178 Laurel Run Circle, Williamsport, PA

Owner: Landowner

Legal: _____

Date: 2-9-2021 E-mail: _____ Phone: (570) 220 - 1872

I. GENERAL INSPECTION RESULTS					
Item	Inspection Results			BMP's in General	
1	☐	Apparent problems	☒	No problems	BMP does not appear to be well maintained.
2	☐	Design flaws	☒	No flaws	BMP observed to have significant design flaws which lessen its effectiveness.
3	☐	Unauthorized modifications	☒	No modifications	BMP has unauthorized modifications that reduce its effectiveness.
4	☐	BMP removed	☒	BMP present	BMP has been destroyed or removed from property.
5	☐	Trash	☒	No Trash	Trash and debris has accumulated on/in BMP. Yard waste in BMP.
6	☐	Contaminated	☒	Uncontaminated	Evidence of Oil, gasoline. Contaminants or other pollutants.
7	☐	Smells	☒	Doesn't smell	Unpleasant odors from the BMP.
II. BMP SPECIFIC INSPECTION RESULTS – INFILTRATION BASIN					
Item	Inspection Results			BMP : Infiltration Basin	
1	☐	Clogged	☒	Not clogged	Flow spreader uneven or clogged so flows are not uniformly distributed across BMP.
2	☐	No sediment trapped	☒	Sediment trapped	The forebay is not trapping sediment before it reaches infiltration basin.
3	☐	Silted in	☒	Enough capacity	Capacity in sediment forebay is less than 50% of design capacity.

Stormwater BMP Owner Inspection Form

Infiltration Basin

4	☐	Inlets need repair	☒	Inlets in good condition	Inlets/pipes are crushed, deformed, damaged, corroded, and in need of repair.
5	☐	Flow bypasses facility	☒	Flow enters BMP	Flow bypasses facility by overtopping berms, erosion channels, or other means.
6	☐	Weeds	☒	No weeds	Invasive, nuisance vegetation or weeds are present.
7	☐	Brush/trees	☒	Proper vegetation	Growth of brush and trees does not allow for proper maintenance. Dead, diseased, or dying trees are present. Tree growth on berms or emergency spillway > 4' in height or covering more than 10% of spillway.
8	☐	Sediment accumulated	☒	No accumulated sediment	Sediment in storage areas, rock filters, and pre-settling ponds and vaults prevents infiltration.
9	☐	Erosion	☒	No erosion	Eroded damage over two inches deep; potential for continued erosion; any erosion on a compacted berm embankment; soil from adjacent areas washes into/on BMP; continued erosion is prevalent.
10	☐	Rodent holes	☒	No rodent holes	If facility acts as a dam or berm, any evidence of rodent holes, or any evidence of water piping through dam or berm via rodent holes.
11	☐	Insects	☒	No insects	Wasps, hornets or bees interfere with maintenance activities. Excessive or nuisance levels.
12	☐	Standing water	☒	No standing water	Water is observed within the BMP (between storms) and appears not to drain freely or soil is excessively soggy. Excessive ponding of water within vegetated swale or other BMP.

Stormwater BMP Owner Inspection Form Infiltration Basin

1. Is maintenance needed at this time?	☐ Yes	☒ No
2. Are mosquitoes or mosquito larvae present?	☐ Yes	☒ No
3. Maintenance items needed/completed:		

Inspected by:



Signature

Jon Sander, PE City Engineer

[Print Full Name]

FOR CITY USE ONLY - DO NOT FILL

Date received : _____	Received By: _____
Comments/Corrective actions required:	

Exhibit 6

City of Williamsport Grey Fox Rentals BMP Inspection Checklist (Dated February 9, 2021)

Stormwater BMP Owner Inspection Form Underground Detention

Address: Grey Fox Rentals - 2851 S Reach Rd, Williamsport

Owner: Grey Fox Rentals

Legal: _____

Date: 2-9-2021 E-mail: _____ Phone: (570) 220 - 1872

I. GENERAL INSPECTION RESULTS					
Item	Inspection Results			BMP's in General	
1	☐	Apparent problems	☒	No problems	BMP does not appear to be well maintained.
2	☐	Design flaws	☒	No flaws	BMP observed to have significant design flaws which lessen its effectiveness.
3	☐	Unauthorized modifications	☒	No modifications	BMP has unauthorized modifications that reduce its effectiveness.
4	☐	BMP removed	☒	BMP present	BMP has been destroyed or removed from property.
5	☐	Trash	☒	No Trash	Trash and debris has accumulated on/in BMP. Yard waste in BMP.
6	☐	Contaminated	☒	Uncontaminated	Evidence of Oil, gasoline. Contaminants or other pollutants.
7	☐	Smells	☒	Doesn't smell	Unpleasant odors from the BMP.
II. BMP SPECIFIC INSPECTION RESULTS – UNDERGROUND DETENTION					
Item	Inspection Results			BMP : Underground Detention	
1	☐	Weeds	☒	No weeds	Invasive, nuisance vegetation or weeds are present.

Stormwater BMP Owner Inspection Form Underground Detention

2	☐	Sediment accumulated	☒	No accumulated sediment	Sediment in storage areas or filter, and has reduced storage volume.
3	☐	Erosion	☒	No erosion	Eroded damage over two inches deep; potential for continued erosion; any erosion on a compacted berm embankment; soil from adjacent areas washes into/on BMP; continued erosion is prevalent.
4	☐	Insects	☒	No insects	Wasps, hornets or bees interfere with maintenance activities. Excessive or nuisance levels.
5	☐	Contaminated	☒	No contaminants	Prevalent and visible contaminants such as oil.
6	☐	Clogged	☒	Not clogged	Entry point for water is clogged or obstructed with sediment and/or debris.
7	☐	Forebay non-operational	☒	Operating properly	Sediment forebay is either filled with sediment (greater than 50% of design depth), being bypassed, or does not exist
8	☐	Pipes/structural repairs needed	☒	Pipes/structure are sound	Pipes and structures show signs of corrosion, spalls, leaks, deformation, crushing or other material failure.

Stormwater BMP Owner Inspection Form
Underground Detention

1. Is maintenance needed at this time?	☐ Yes	☒ No
2. Are mosquitoes or mosquito larvae present?	☐ Yes	☒ No
3. Maintenance items needed/completed: _____ _____ _____		

Inspected by:



Signature

Jon Sander, PE City Engineer

[Print Full Name]

FOR CITY USE ONLY - DO NOT FILL

Date received : _____

Received

By: _____

Comments/Corrective actions required:

Exhibit 7

City of Williamsport Pace Analytical BMP Inspection Checklist (Dated February 9, 2021)

Stormwater BMP Owner Inspection Form Infiltration Basin

Address: Pace Analytical - 2829 Reach Rd, Williamsport

Owner: Pace Analytical

Legal: _____

Date: 2-9-2021 E-mail: _____ Phone: (570) 220 - 1872

I. GENERAL INSPECTION RESULTS					
Item	Inspection Results			BMP's in General	
1	☐	Apparent problems	☒	No problems	BMP does not appear to be well maintained.
2	☐	Design flaws	☒	No flaws	BMP observed to have significant design flaws which lessen its effectiveness.
3	☐	Unauthorized modifications	☒	No modifications	BMP has unauthorized modifications that reduce its effectiveness.
4	☐	BMP removed	☒	BMP present	BMP has been destroyed or removed from property.
5	☐	Trash	☒	No Trash	Trash and debris has accumulated on/in BMP. Yard waste in BMP.
6	☐	Contaminated	☒	Uncontaminated	Evidence of Oil, gasoline. Contaminants or other pollutants.
7	☐	Smells	☒	Doesn't smell	Unpleasant odors from the BMP.
II. BMP SPECIFIC INSPECTION RESULTS – INFILTRATION BASIN					
Item	Inspection Results			BMP : Infiltration Basin	
1	☐	Clogged	☒	Not clogged	Flow spreader uneven or clogged so flows are not uniformly distributed across BMP.
2	☐	No sediment trapped	☒	Sediment trapped	The forebay is not trapping sediment before it reaches infiltration basin.
3	☐	Silted in	☒	Enough capacity	Capacity in sediment forebay is less than 50% of design capacity.

Stormwater BMP Owner Inspection Form

Infiltration Basin

4	☐	Inlets need repair	☒	Inlets in good condition	Inlets/pipes are crushed, deformed, damaged, corroded, and in need of repair.
5	☐	Flow bypasses facility	☒	Flow enters BMP	Flow bypasses facility by overtopping berms, erosion channels, or other means.
6	☐	Weeds	☒	No weeds	Invasive, nuisance vegetation or weeds are present.
7	☐	Brush/trees	☒	Proper vegetation	Growth of brush and trees does not allow for proper maintenance. Dead, diseased, or dying trees are present. Tree growth on berms or emergency spillway > 4' in height or covering more than 10% of spillway.
8	☐	Sediment accumulated	☒	No accumulated sediment	Sediment in storage areas, rock filters, and pre-settling ponds and vaults prevents infiltration.
9	☐	Erosion	☒	No erosion	Eroded damage over two inches deep; potential for continued erosion; any erosion on a compacted berm embankment; soil from adjacent areas washes into/on BMP; continued erosion is prevalent.
10	☐	Rodent holes	☒	No rodent holes	If facility acts as a dam or berm, any evidence of rodent holes, or any evidence of water piping through dam or berm via rodent holes.
11	☐	Insects	☒	No insects	Wasps, hornets or bees interfere with maintenance activities. Excessive or nuisance levels.
12	☐	Standing water	☒	No standing water	Water is observed within the BMP (between storms) and appears not to drain freely or soil is excessively soggy. Excessive ponding of water within vegetated swale or other BMP.

Stormwater BMP Owner Inspection Form
Infiltration Basin

1. Is maintenance needed at this time?	☐ Yes	☒ No
2. Are mosquitoes or mosquito larvae present?	☐ Yes	☒ No
3. Maintenance items needed/completed:		

Inspected by:



Signature

Jon Sander, PE City Engineer

[Print Full Name]

FOR CITY USE ONLY - DO NOT FILL

Date received : _____

Received

By: _____

Comments/Corrective actions required:

Exhibit 8

WSA West Plant BMP Inspection Checklist (Dated February 9, 2021)

Stormwater BMP Owner Inspection Form Rain Garden

Address: WMWA West Plant - 26 Arch St, Williampsort

Owner: WMWA

Legal: _____

Date: 2-9-2021 E-mail: _____ Phone: (570) 220 - 1872

I. GENERAL INSPECTION RESULTS					
Item	Inspection Results			BMP's in General	
1	☐	Apparent problems	☒	No problems	BMP does not appear to be well maintained.
2	☐	Design flaws	☒	No flaws	BMP observed to have significant design flaws which lessen its effectiveness.
3	☐	Unauthorized modifications	☒	No modifications	BMP has unauthorized modifications that reduce its effectiveness.
4	☐	BMP removed	☒	BMP present	BMP has been destroyed or removed from property.
5	☐	Trash	☒	No Trash	Trash and debris has accumulated on/in BMP. Yard waste in BMP.
6	☐	Contaminated	☒	Uncontaminated	Evidence of Oil, gasoline. Contaminants or other pollutants.
7	☐	Smells	☒	Doesn't smell	Unpleasant odors from the BMP.
II. BMP SPECIFIC INSPECTION RESULTS – RAIN GARDEN					
Item	Inspection Results			BMP : Rain Garden	
1	☐	Sediment accumulated	☒	No sediment accumulated	Sediment depth exceeds 2 inches on more than 10% of vegetated treatment area or interferes with BMP performance.

Stormwater BMP Owner Inspection Form

Rain Garden

2	☐	Erosion or scouring	☒	No erosion or scouring	Eroded or scoured areas (including spillway) due to flow channelization, higher flows, wind or water.
3	☐	Poor vegetation	☒	Proper vegetation	Planted vegetation is sparse or bare or eroded patches occur in more than 10% of the BMP.
4	☐	Nuisance vegetation	☒	Proper vegetation	Planted vegetation is excessively tall; nuisance weeds, invasive or noxious vegetation are overgrown; vegetation reduces free movement of water through BMP.
5	☐	Brush/trees	☒	Proper vegetation	Growth of brush and trees does not allow for proper maintenance.
6	☐	Standing water	☒	No standing water	Water is observed within the BMP (between storms) and appears not to drain freely or soil is excessively soggy. Excessive ponding of water within vegetated swale or other BMP.
7	☐	Clogged	☒	Not clogged	Inlet/outlet clogged or obstructed with sediment and/or debris.
8	☐	Flow	☒	No flow	Small quantities of water flow through the BMP, even when it has been dry for weeks, and an eroded, muddy channel has formed in the bottom.
9	☐	Clogged	☒	Not clogged	Overflow clogged or obstructed with sediment and/or debris.

Stormwater BMP Owner Inspection Form
Rain Garden

1. Is maintenance needed at this time?	☐ Yes	☒ No
2. Are mosquitoes or mosquito larvae present?	☐ Yes	☒ No
3. Maintenance items needed/completed:		

Inspected by:



Signature

Jon Sander, PE City Engineer

[Print Full Name]

FOR CITY USE ONLY - DO NOT FILL

Date received : _____

Received

By: _____

Comments/Corrective actions required:

Exhibit 9

Long Term Operations & Maintenance Plan for the WSA West Plant BMPs



WILLIAMSPORT SANITARY AUTHORITY
253 WEST FOURTH STREET
WILLIAMSPORT, PA 17701
(570) 323-6148

MEMORANDUM

To: Brittany Laninger, Ryan Orgitano

CC: Michael Miller, Steve Benner, Wendy Walter, Eric Smithgall, Marcia LeBeau

From: Cheryl Terpak

Date: July 11, 2019

Subject: Updated West Plant Stormwater PPC Plan

Please see the attached updated Stormwater Industrial Pollution, Prevention, and Contingency (PPC) Plan for the WSA West Plant, which was revised on July 10, 2019 and is effective immediately, replacing the version dated September 6, 2016. Revisions to the plan include changes/updates to the following:

- Personnel responsible for plan implementation
- Job titles
- Contact Information
- Material Inventory (including removal of sodium hydroxide and addition of sodium bisulfite)
- Maps (including removal of sodium hydroxide and addition of sodium bisulfite)
- Formatting and typographical errors

Please review the current version of the plan so you understand your role in its implementation (this includes anyone CC'd on this memo). I will send a hard copy of the plan to the West Plant to keep on file at that facility. In addition, a hard copy will be kept at the office in the Compliance Department.

If you have any questions or comments, please feel free to contact me.

**WILLIAMSPORT SANITARY AUTHORITY
WEST WASTEWATER TREATMENT PLANT**

**STORMWATER INDUSTRIAL
POLLUTION, PREVENTION, AND CONTINGENCY
PLAN**

July 10, 2019

STORMWATER INDUSTRIAL POLLUTION, PREVENTION, AND CONTINGENCY PLAN FOR THE WEST WASTEWATER TREATMENT PLANT

I. INTRODUCTION

This plan has been established to comply with the Williamsport Sanitary Authority's (WSA) -- West Plant NPDES Permit No. PA0027049 issued by the Pennsylvania Department of Environmental Protection (PaDEP). This pollution prevention approach is for the industrial activities associated with wastewater treatment and includes three major objectives:

1. To identify sources of pollution potentially affecting the quality of stormwater discharges associated with industrial activity from the facility.
2. To describe and ensure implementation of practices to minimize and control pollutants in stormwater discharges associated with industrial activity from the facility
3. To ensure compliance with the terms and conditions of the permit.

II. PLAN CONTENTS

This plan consists of the following items:

- Pollution Prevention Team
- Site Map
- Emergency Contacts
- Materials Inventory
- List of Significant Spills and Leaks
- Non-Stormwater Discharge Assessment and Certification
- Summary of Pollutant Sources – Site Assessment
- Best Management Practices
- Employee Training
- Annual Site Compliance Evaluation
- Recordkeeping and Internal Reporting
- Plan Revisions
- Signatory

III. POLLUTION PREVENTION TEAM

The pollution prevention team for the WSA West Plant is responsible for the development, updating, and implementation of this plan. The team includes the following members:

Director of Compliance, Safety, and Security

- Coordinate all stages of plan development and implementation.

Environmental Supervisor

- Keep all records and ensure reports are submitted as required.

Director of Engineering

- Choose stormwater management options and assist in completion of annual inspections.

Director of Operations

- Assist in plan development, oversee plan implementation, documentation, annual inspections, and incorporate process changes affecting this plan.

West Plant Superintendent

- Implement the plan, conduct annual inspections, document the completion of all activities, and notify the Director of Operations of any process changes affecting this plan.

IV. SITE MAP

The figures attached present facility site maps that indicate the location of the facility and site boundaries, location of chemical storage areas onsite, and the location of the three PaDEP permitted outfall points from the facility. A description of possible pollutant source contributors to each point is detailed below.

<u>OUTFALL #</u>	<u>Type of Discharge</u>
Outfall 001	Publicly Owned Treatment Works (POTW) treated effluent permitted by NPDES Permit No. PA0027049 discharges to the West Branch of the Susquehanna River
Outfall 002	Arch Street Combined Sewer Overflow (CSO) Discharge permitted by NPDES Permit No. PA0027049 discharges to West Branch of the Susquehanna River
Outfall 003	Stormwater discharge to the West Branch of the Susquehanna River permitted by NPDES Permit No. PA0027049

V. EMERGENCY CONTACTS

Primary Contact: Brittany Laninger	Work Phone: (570) 323-5894
Title: West Plant Superintendent	Emergency Phone: (570) 505-9316
Secondary Contact: Ryan Orgitano	Work Phone: (570) 323-5894
Title: West Plant Assistant Superintendent	Emergency Phone: (570) 560-1011
Tertiary Contact: Steve Benner	Work Phone: (570) 323-5528
Title: Director of Operations	Emergency Phone: (570) 337-8588
Type of Facility: Publicly Owned Treatment Works	
Operating Schedule: 24-hours/day; 7 days/week	
Number of Employees: The plant has 14 full time employees onsite.	
NPDES Permit Number: PA0027049	

VI. MATERIALS INVENTORY

Attached

VII. LIST OF SIGNIFICANT SPILLS AND LEAKS

There has been one significant spill or leak at this facility in the past three years.

- August 2, 2016 -- Approximately 100 gallons of digested sludge was spilled onto a paved area at the WSA West Plant, of which approximately 20 gallons flowed to the ground. The incident was caused by an equipment malfunction during a pilot study. Please see the attached notification letter to PaDEP on August 5, 2016 for further details.

VIII. NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION

Attached

IX. SUMMARY OF POLLUTANT SOURCES – SITE ASSESSMENT

1. The most likely place for an accidental spill is the unloading docks where raw materials are delivered. The transfer of materials from incoming trucks to storage areas is a potential source of pollution. Although there are no present problems, absorbents, brooms, and shovels are available to quickly contain any spill.
2. A vehicle accident on Interstate 180 could result in a chemical spill.

3. Gasoline used for lawn mowers is a potential source of pollution. Gasoline storage and use will be addressed in the WSA Safety Training Program as part of the lawn mower safety section.
4. There is no vehicle washing conducted at this facility.
5. There is no outdoor storage of chemicals at this facility.

X. BEST MANAGEMENT PRACTICES

1. Good Housekeeping: The WSA West Plant is dedicated to maintaining a clean and orderly work environment. The following housekeeping practices will be implemented so that releases of hazardous substances or oil to stormwater do not occur:
 - a. Maintain up-to-date material inventory. Identify all chemical substances present in the workplace and maintain current SDSs.
 - b. All containers and piping shall be appropriately labeled.
 - c. Cleanup duties are routinely assigned by the Superintendent.
 - d. All work areas are to be kept well organized and neat.
 - e. All employees will be trained about good housekeeping practices.
 - f. The paved areas around the plant will be swept as necessary to prevent debris from entering stormwater impounding area.
 - g. Obsolete chemicals will be appropriately disposed.
2. Preventative Maintenance:
 - a. Daily inspection of exterior of facility for debris and spilled material or leaks that could enter the stormwater impounding area.
 - b. Weather permitting, monthly inspection of the roof area for debris to ensure that the roof drains are clear.
 - c. A minimal appropriate amount of gasoline will be kept on site.
 - d. 55-gallon drums of oil will be stored and used on containment skids.
 - e. Unloading procedures will be followed to prevent a spill of material.
 - f. Inspect the riprap channels and outfalls after each heavy rainfall event. Immediately make all needed repairs to prevent future damage. Replace any stones which have been dislodged and repair any eroded areas with additional riprap. Record the information on the *Facility Stormwater Management* log, which has been attached as part of this plan.
3. Spill Prevention and Response:
 - a. The 3,500 gallon above ground fuel oil tank has double wall containment and leak alarms.
 - b. All 55-gallon drums of oil are stored and used on containment skids.
 - c. Good housekeeping practices will be followed.

- d. Regular visual inspections to identify areas for potential leaks or spills will be performed
- e. All spills will be promptly cleaned up, and a supervisor will be notified.
- f. Appropriate authorities will be notified in the event of a spill.

4. Sediment and Erosion Control:

- a. Any projects involving earthmoving at this facility shall be in accordance with an appropriate Erosion and Sediment Pollution Control Plan to adequately meet the requirements of Pa Title 25, Chapter 102, Erosion Control.
- b. Grass shall be maintained in all areas not paved or part of the runoff management system.

5. Runoff Management:

- a. The majority of the stormwater runoff from the site is collected by a paved channel which was installed in 2002 to improve the drainage from the site. The northern portion of the channel also serves as an access road. The paved channel is 780 feet long and 8 feet wide. The channel runs from the northwest corner of the site to the east along the base of the U.S. Route 220 embankment. The channel continues along the perimeter of the site and turns to the south along the levee system. There are two rock riprap-lined channels. One is located at the eastern portion and one at the end of the paved channel where the flow enters a grassy ponding area which was constructed as part of the U.S. Army Corps of Engineers/City of Williamsport Flood Control System. The flow from the channel, along with runoff from the western portion of the site, is normally absorbed by the ground. However, during extended wet weather it may be conveyed through the levee system to the Susquehanna River by a 30-inch flood control pipe and flap gate maintained by the City of Williamsport, located at the southern portion of the site. There is also a valve on the 30-inch outlet pipe on the top of the levee. Plant personnel report that they have never seen a discharge through this outfall.
- b. The remainder of the stormwater runoff from the site is collected by two stormwater BMP's, a rain garden and vegetated swale, that were installed as part of the West Plant Phase 2 upgrades completed during 2013 – 2015. As a requirement of the *General NPDES Permit for Stormwater Discharges Associated with Construction Activities* that was required to be submitted by the WSA and approved by the PaDEP in order to complete the Phase 2 upgrades, a *Post Construction Stormwater Management (PCSM) Plan* was included and approved, which identified these required BMP's and their long term operation and maintenance. The Long Term Operation and Maintenance of the PCSM BMPs for the rain garden and vegetated swale (Section 4 - Permanent Best Management Practices and Section 5 –Maintenance) have been included as Appendix I of this plan for easy reference. Continued implementation of the Long Term Operation

and Maintenance Plan is guaranteed by a property deed covenant and is enforceable by the Lycoming County Conservation District.

XI. EMPLOYEE TRAINING

1. Who must be trained: Operators, Assistant Operators, Maintenance Crew
2. When will training occur:
 - a. Employee safety training meetings are held each month which include discussion on the following topics:
 - Any environmental/health and safety incidents
 - Upcoming training sessions
 - Brief reminders on good housekeeping, spill prevention and response procedures, and material handling practices
 - Announce any changes to the plan
 - Announce any new management practices
 - b. In-depth pollution prevention training for new employees.
 - c. Refresher courses held annually to address:
 - Good housekeeping
 - Spill prevention and response procedures
 - Material handling and storage
3. Employee Training Program Topics:
 - Contents and purpose of this plan, including the Long Term O&M Plan of the rain garden and vegetated swale
 - Review and demonstrate basic clean-up (sweeping) procedures
 - Clearly indicate proper disposal locations
 - Location of routine clean-up equipment
4. Spill Prevention and Response:
 - Clearly identify potential spill areas and drainage routes
 - Familiarize employees with past spill events – why they happened and the environmental impact
 - Post emergency contacts and telephone numbers
5. Materials Handling and Storage:
 - Be sure employees are aware which materials are hazardous and where those materials are stored
 - Point out container labels
 - Direct employees to use the oldest materials first
 - Explain recycling practices
 - Demonstrate how valves are tightly closed and how drums should be sealed

XII. ANNUAL SITE COMPLIANCE EVALUATION

The West Plant Superintendent is responsible to conduct and document a site compliance evaluation annually. The inspection shall be documented and focus on the following items:

- Visual inspection of the stormwater drainage areas for evidence of pollutants entering the drainage system
- Evaluation of the effectiveness of the BMPs

- Observe structural measures, sediment controls, and other stormwater BMPs to ensure proper operation
- Identify plan revisions necessary to reduce the discharge of pollutants.
- Implement any necessary changes
- Complete the Pa DEP's *Annual Inspection Form for NPDES Permit with Discharges of Stormwater Associated with Industrial Activity*. This form can be found attached to the current West Plant NPDES Permit.
- Sign the report and keep it with the plan
- Submit a copy to the Compliance Department for review and record retention

XIII. RECORDKEEPING AND INTERNAL REPORTING

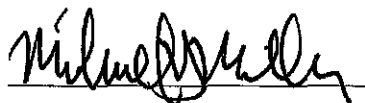
All records required to be maintained by this plan including maintenance records, records of spills, leaks, inspections, and maintenance activities must be maintained by the West Plant Superintendent for at least five years. For spills and leaks, records must include information such as the date and time of the incident, weather conditions, cause, and resulting environmental problems.

XIV. PLAN REVISIONS

The plan will be amended whenever there is a change at the site (including design, construction, operation or maintenance) which has an effect on the potential to discharge pollutants to water bodies or the actions required by the plan fail to ensure or adequately protect against water pollution.

XV. SIGNATORY

Name: Michael D. Miller

Signed: 

Date: July 10, 2019

Title: Executive Director

NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION WEST PLANT

Date of Test or Evaluation	Outfall Directly Observed During the Test	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation
2/25/2003	3	Visual Inspection	No Discharge Observed	*See Field Notes	Wendy Walter, Carl Myers, Jofin Tucker

Certification:

I, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name & Official Title (Please Print)

B. Area Code and Telephone No.

C. Signature

D. Date Signed

APPENDIX I – LONG TERM OPERATION AND MAINTENANCE of PCSM BMP's

I. PERMANENT BEST MANAGEMENT PRACTICES

The following permanent erosion and sediment control measures have been installed:

- Rain Garden
- Vegetated Swale

A. Rain Garden

1. General Description

Rain gardens serve as a method of treating stormwater by pooling water on the surface and allowing filtering and settling of suspended solids and sediment at the surface layer, prior to entering the plant/soil/microbe complex media for infiltration and pollutant removal. Design and planting techniques are used to accomplish water quality improvement and water quantity reduction. The rain garden installed at the West Plant in June 2016 is constructed with an overflow catch basin to direct excessive rainfall runoff to the vegetated swale and the West Plant stormwater channel via a controlled release discharge. The rain garden receives pavement sheet flow runoff from the south and west sides of the headworks building in addition to catch basin discharge.

2. Sizing and Design of the Rain Garden

The site's rain garden has been designed in accordance with the PaDEP BMP Manual with the following criteria:

- Existing soil has an acceptable infiltration capacity.
- Sub-grades are uncompacted.
- Ponding depths were designed to be 12 inches and drain within 6 hours.
- Side slopes will be 3:1.
- Emergency spillways will provide positive outflow.
- The bottom of the rain garden is level, with a planting soil depth and plant selection specified in the Tables 1&2 below.

3. Maintenance and Inspection

The rain garden will be routinely inspected and maintained by the plant Superintendent as follows:

- a. At least two times per year, the area will be inspected for sediment buildup, erosion, vegetative conditions, etc.
- b. Annually, remove any accumulated leaves and other detritus.

- c. At the end of the growing season, typically October, cut down perennial plantings.
- d. Twice per year, evaluate the health of the trees and shrubs. Replace as necessary.
- e. Annually, inspect the overflow catch basin discharge piping, cleaning or repairing as necessary.
- f. In addition to the itemized inspection items at the frequencies listed above, a *Stormwater Management Inspection Form* must be completed quarterly. The form has been attached to this Appendix.

B. Vegetated Swale

1. General Description

Vegetated swales are broad, shallow, typically trapezoidal channels that receive runoff from adjacent impervious surfaces and are designed to slow it down, promote infiltration, and filter pollutants and sediments in the process of conveying the runoff. The vegetated swale installed at the West Plant in April 2015 conveys the stormwater discharge from the rain garden and sheet flow runoff from paved areas on the southwest side of the existing administration building to the pre-existing drainage swale along the south side of the property which discharges to a 30-inch stormwater pipe that passes through the levee to the Susquehanna river. The pipe is equipped with a one-way flap gate to prevent stormwater on the river side of the levee from entering the site during extremely high river levels.

2. Sizing and Design of the Vegetated Swale

The site's vegetated swale has been designed in accordance with the PaDEP BMP Manual with the following criteria:

- Existing soil has an acceptable infiltration capacity.
- Sub-grades are uncompacted.
- Ponding depths were designed to be 12 inches and drain within 6 hours.
- Side slopes will be 3:1 with a bottom width of 6 feet.
- The design depth is 24 inches.
- The swale bottom has a slope of 0.5% and the planting mix to be used can be found in the Tables 1&2 below.

3. Maintenance and Inspection

- a. Operation and maintenance of the vegetated swale is limited to grass mowing and periodically removing any excessive blown-in debris or leaf build-up.
- b. In addition to the itemized inspection items at the frequencies listed above, a *Stormwater Management Inspection Form* must be completed quarterly. The form has been attached to this Appendix.

C. Summary of Volume Capacities

	Storage Volume (ft ³)	Infiltration Volume (ft ³)	Total Volume Reduction (ft ³)
Rain Garden	826	320	1,146
Vegetated Swale	3,891	1,412	5,303
All BMPs	4,717	1,732	6,449

D. Shrub and Tree Plantings

The following tables consist of the vegetation planted in the rain garden and/or vegetated swale at the West Plant. The contents of the tables should be used as a resource if/when vegetation needs replaced, although other appropriate vegetation may be used.

Table 1: Shrub and Tree Planting List

Common Name	Scientific Name	Indicator Status*	Size/Type	Spacing	Application
Common buttonbush	Cephalanthus occidentalis	OBL	Min. 18"/ Bare Root	3-stem clusters at 4-ft spacing ¹	Rain Garden
Bald cypress	Taxodium distichum	OBL	Min. 18"/ Bare Root	3-stem clusters at 4-ft spacing ¹	Rain Garden
Smooth alder	Alnus serrulata	OBL	Min. 18"/ Bare Root	3-stem clusters at 4-ft spacing ¹	Rain Garden
Black willow	Salix nigra	FACW+	Min. 18"/ Bare Root	3-stem clusters at 4-ft spacing ¹	Rain Garden

Table 2: Wetland Grass and Herb Planting List

Common Name	Scientific Name	Indicator Status	% of Mix ²	Application
Redtop	<i>Agrostis alba</i>	FACW	20	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Virginia wildrye	<i>Elymus virginicus</i>	FACW	20	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Alkaligrass	<i>Puccinellia distans</i>	OBL	20	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Fox sedge	<i>Carex vulpinoidea</i>	OBL	15	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Creeping bentgrass	<i>Agrostis stolonifera</i>	FACW	10	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Fowl bluegrass	<i>Poa palustris</i>	FACW	10	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Ticklegrass	<i>Agrostis scabra</i>	FAC	2	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Squarrose sedge	<i>Carex squarrosa</i>	FACW	2	Vegetated Swale, Rain Garden, & Landscape Restoration Areas
Soft rush	<i>Juncus effusus</i>	FACW+	1	Vegetated Swale, Rain Garden, & Landscape Restoration Areas

Foot Notes:

⁺ a frequency toward the wetter end of the indicator status category

¹ 4-ft centers, staggered by 2 feet, randomly alternating with other species

² Apply grass and seed mix at a rate of 20-40 lbs per acre, or 1 lb per 1,000 square feet

General Notes:

1. Apply soil amendments as determined by conditions on site and soil nutrient testing after final grade has been established.

2. * Indicator status is defined as follows:

OBL	Obligate Wetland	Occurs almost always (estimated probability 99%) under natural conditions in wetlands.
FACW	Facultative Wetland	Usually occurs in wetlands (estimated probability 67% - 99%), but occasionally found in non-wetlands.
FAC	Facultative	Equally likely to occur in wetlands or non-wetlands (estimated probability 34% - 66%).

3. 3 tons per acre of straw mulch will be applied immediately after the grass seed mixture for permanent BMP seeding. Temporary seeding, where erosion control blankets are not used, shall be stabilized within 4 days of disturbance. 6 tons per acre of agricultural lime and 1,000 lbs per acre of 10-10-20 fertilizer will be applied prior to seeding/mulching, unless soil testing recommends different ratios.

E. Housekeeping/Pollution Prevention

The following housekeeping and pollution prevention practices will be implemented so that releases of hazardous substances or oil to stormwater do not occur:

- Store, as appropriate, only enough products on-site required to complete the project.
- Store materials in a neat, orderly manner in their original containers (unless they are not re-sealable), and with either the materials original manufacturer's label or replacement label that identify the contents of each container.
- Follow manufacturer's recommendations for proper use and disposal, and do not mix substances with one another unless recommended by the manufacturer.
- Use, whenever possible, all of the product before disposing of the container. If surplus product must be disposed of, follow manufacturers' or state/local recommended methods for disposal.
- Inspect material storage areas routinely to verify proper use and management of materials for, at a minimum, the following:
 - Leaks, corrosion, and integrity of containers
 - Accumulated liquids on the ground
 - Improper labeling and storage practices
 - Opened or deteriorated containers
- Provide a secondary containment berm, or other device, for onsite containers with a 55-gallon capacity or larger that are utilized to store ethanol, diesel fuel, gasoline fuel, oil, or other hazardous substances to ensure residual material resulting from leaks/drips do not enter into the stormwater discharge.
- Conduct routine maintenance such as replacement and repair of leaking fittings, valves, hoses, or other equipment. Remediate/clean-up minor spills which pose no threat to site personnel that may have resulted from leaking containers, equipment leaks, spilled materials, or other site specific operations immediately after discovery.

In the unlikely event that a discharge of hazardous substance or oil in an amount equal to or in excess of a reportable quantity does occur, the E&SC Plan will be modified as needed, within 14 calendar days following the event to include measures to prevent a similar type of release from reoccurring and responses to such a release if a similar release occurs. In addition, a description of the date and cause of the release and the clean-up measures taken will be included in the E&SC Plan as well as reported to the proper state and federal agencies.

F. Record Retention/Reporting

A record of inspections will be maintained by the WSA. These inspection records will include the date(s) and name(s) of personnel making the inspection and results (including any major observations and corrective actions taken or needed). Notification will be made to the Lycoming County Conservation District for any BMP failures or modifications to E&S controls.

STORM WATER MANAGEMENT INSPECTION FORM
WILLIAMSPORT SANITARY AUTHORITY
QUARTERLY VISUAL INSPECTION FORM POST CONSTRUCTION

Date

Time:

Inspected By:

ITEM INSPECTED	RESPONSE (Y/N)	REMARKS/CORRECTIVE ACTIONS
Rain Garden		
Are Sediment Levels below cleanout level?		
Are outfalls into Rain Garden free of debris/unclogged?		
Are slopes free of erosion/rutting?		
Is outfall free of debris/unclogged?		
Vegetated Swale		
Are Sediment Levels below cleanout level?		
Are outfalls into Rain Garden free of debris/unclogged?		
Are slopes free of erosion/rutting?		
Is outfall free of debris/unclogged?		
LOCALIZED SITE GRADING		
Are slopes free of erosion/rutting?		
CATCH BASIN #1		
Are outfalls into basin free of debris/unclogged?		
Are slopes of basin free of erosion/rutting?		
CATCH BASIN #2		
Are outfalls into basin free of debris/unclogged?		
Are slopes of basin free of erosion/rutting?		
CATCH BASIN #3		
Are outfalls into basin free of debris/unclogged?		
Are slopes of basin free of erosion/rutting?		
CATCH BASIN #4		
Are outfalls into basin free of debris/unclogged?		
Are slopes of basin free of erosion/rutting?		
CATCH BASIN #5		
Are outfalls into basin free of debris/unclogged?		
Are slopes of basin free of erosion/rutting?		

Exhibit 10

WSA West Plant routine quarterly inspection records (May 2020 – January 2021)

STORM WATER MANAGEMENT INSPECTION FORM
WILLIAMSPORT SANITARY AUTHORITY
QUARTERLY VISUAL INSPECTION FORM POST CONSTRUCTION

Date 5-13-2020

Time: 2:05pm

Inspected By: Brittany Laninger

ITEM INSPECTED	RESPONSE (Y/N)	REMARKS/CORRECTIVE ACTIONS
Rain Garden		
Are Sediment Levels below cleanout level?	Yes	
Are outfalls into Rain Garden free of debris/unclogged?	Yes	
Are slopes free of erosion/rutting?	Yes	
Is outfall free of debris/unclogged?	Yes	
Vegetated Swale		
Are Sediment Levels below cleanout level?	Yes	
Are outfalls into Rain Garden free of debris/unclogged?	Yes	
Are slopes free of erosion/rutting?	Yes	
Is outfall free of debris/unclogged?	Yes	
LOCALIZED SITE GRADING		
Are slopes free of erosion/rutting?	Yes	
CATCH BASIN #1		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #2		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #3		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #4		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #5		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	

STORM WATER MANAGEMENT INSPECTION FORM
WILLIAMSPORT SANITARY AUTHORITY
QUARTERLY VISUAL INSPECTION FORM POST CONSTRUCTION

Date 8-7-2020

Time: 1:30pm

Inspected By: Brittany Laninger

ITEM INSPECTED	RESPONSE (Y/N)	REMARKS/CORRECTIVE ACTIONS
Rain Garden		
Are Sediment Levels below cleanout level?	yes	
Are outfalls into Rain Garden free of debris/unclogged?	yes	
Are slopes free of erosion/rutting?	yes	
Is outfall free of debris/unclogged?	yes	
Vegetated Swale		
Are Sediment Levels below cleanout level?	yes	
Are outfalls into Rain Garden free of debris/unclogged?	yes	
Are slopes free of erosion/rutting?	yes	
Is outfall free of debris/unclogged?	yes	
LOCALIZED SITE GRADING		
Are slopes free of erosion/rutting?	yes	
CATCH BASIN #1		
Are outfalls into basin free of debris/unclogged?	yes	
Are slopes of basin free of erosion/rutting?	yes	
CATCH BASIN #2		
Are outfalls into basin free of debris/unclogged?	yes	
Are slopes of basin free of erosion/rutting?	yes	
CATCH BASIN #3		
Are outfalls into basin free of debris/unclogged?	yes	
Are slopes of basin free of erosion/rutting?	yes	
CATCH BASIN #4		
Are outfalls into basin free of debris/unclogged?	yes	
Are slopes of basin free of erosion/rutting?	yes	
CATCH BASIN #5		
Are outfalls into basin free of debris/unclogged?	yes	
Are slopes of basin free of erosion/rutting?	yes	

STORM WATER MANAGEMENT INSPECTION FORM
WILLIAMSPORT SANITARY AUTHORITY
QUARTERLY VISUAL INSPECTION FORM POST CONSTRUCTION

Date 11-19-2020

Time: 9:20am

Inspected By: Brittany Laninger

ITEM INSPECTED	RESPONSE (Y/N)	REMARKS/CORRECTIVE ACTIONS
Rain Garden		
Are Sediment Levels below cleanout level?	Yes	
Are outfalls into Rain Garden free of debris/unclogged?	Yes	
Are slopes free of erosion/rutting?	Yes	
Is outfall free of debris/unclogged?	Yes	
Vegetated Swale		
Are Sediment Levels below cleanout level?	Yes	
Are outfalls into Rain Garden free of debris/unclogged?	Yes	
Are slopes free of erosion/rutting?	Yes	
Is outfall free of debris/unclogged?	Yes	
LOCALIZED SITE GRADING		
Are slopes free of erosion/rutting?	Yes	
CATCH BASIN #1		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #2		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #3		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #4		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	
CATCH BASIN #5		
Are outfalls into basin free of debris/unclogged?	Yes	
Are slopes of basin free of erosion/rutting?	Yes	

STORM WATER MANAGEMENT INSPECTION FORM
WILLIAMSPORT SANITARY AUTHORITY
QUARTERLY VISUAL INSPECTION FORM POST CONSTRUCTION

Date 1-27-21

Time: 3:00pm

Inspected By: Brittany Laninger

ITEM INSPECTED	RESPONSE (Y/N)	REMARKS/CORRECTIVE ACTIONS
Rain Garden		
Are Sediment Levels below cleanout level?	YES	
Are outfalls into Rain Garden free of debris/unclogged?	YES	
Are slopes free of erosion/rutting?	YES	
Is outfall free of debris/unclogged?	YES	
Vegetated Swale		
Are Sediment Levels below cleanout level?	YES	
Are outfalls into Rain Garden free of debris/unclogged?	YES	
Are slopes free of erosion/rutting?	YES	
Is outfall free of debris/unclogged?	YES	
LOCALIZED SITE GRADING		
Are slopes free of erosion/rutting?	YES	
CATCH BASIN #1		
Are outfalls into basin free of debris/unclogged?	YES	
Are slopes of basin free of erosion/rutting?	YES	
CATCH BASIN #2		
Are outfalls into basin free of debris/unclogged?	YES	
Are slopes of basin free of erosion/rutting?	YES	
CATCH BASIN #3		
Are outfalls into basin free of debris/unclogged?	YES	
Are slopes of basin free of erosion/rutting?	YES	
CATCH BASIN #4		
Are outfalls into basin free of debris/unclogged?	YES	
Are slopes of basin free of erosion/rutting?	YES	
CATCH BASIN #5		
Are outfalls into basin free of debris/unclogged?	YES	
Are slopes of basin free of erosion/rutting?	YES	

Exhibit 11

WSA West Plant 2020 Annual Inspection Form



pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER STANDARDS AND FACILITY REGULATION

**ANNUAL INSPECTION FORM
FOR NPDES PERMITS FOR DISCHARGES OF
STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES**

1. Date of Inspection <u>9/30/2020</u> 3. NPDES Permit # <u>PA0027049</u>	2. Facility Owner/Operator Name and Address: <u>Williamsport Sanitary Authority</u> <u>253 West Fourth Street</u> <u>Williamsport PA 17701</u> Tel: <u>(570)323-6148</u> Fax: <u>(570)323-1721</u>																														
4. Facility Address and Location Street <u>26 Arch Street</u> Municipality <u>Williamsport PA 17701</u> County <u>Lycoming</u>																															
VISUAL INSPECTION Provide the following information for the storm event																															
5. Duration <u>21 hours</u>																															
6. Estimation of rainfall (in inches) † <u>1.72"</u> † The annual inspection should be conducted after a storm event that is greater than 0.1 inches in magnitude and that occurred at least 72 hours from the previous 0.1 inch storm event.																															
7. Estimate the time between the previous rain event <u>384 hours</u>																															
8. Estimate the total volume (in gallons) for each outfall and report it in item 9. Volume = $C \times I \times A$, where C is the runoff coefficient (i.e., 0.9 for paved and 0.5 for unpaved) I is the rainfall amount (in ft), and A is the area (square feet) drained to the outfall inspected (convert from cubic feet to gallons by multiplying by 7.481).																															
9. Estimate the size of the drainage area (in square feet) for each outfall. <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Outfall #</th> <th style="width: 20%;">Drainage Area</th> <th style="width: 20%;">% Paved</th> <th style="width: 20%;">% Unpaved</th> <th style="width: 20%;">Volume in gallons</th> </tr> </thead> <tbody> <tr> <td><u>003</u></td> <td><u>9.74 Acres</u> <u>424,415 ft²</u></td> <td><u>3.85 Acres</u> <u>167,876 ft²</u></td> <td><u>5.89 Acres</u> <u>256,539 ft²</u></td> <td>Paved: <u>162,009 gallons</u> Unpaved: <u>137,540 gallons</u> Total: <u>299,549 gallons</u></td> </tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>		Outfall #	Drainage Area	% Paved	% Unpaved	Volume in gallons	<u>003</u>	<u>9.74 Acres</u> <u>424,415 ft²</u>	<u>3.85 Acres</u> <u>167,876 ft²</u>	<u>5.89 Acres</u> <u>256,539 ft²</u>	Paved: <u>162,009 gallons</u> Unpaved: <u>137,540 gallons</u> Total: <u>299,549 gallons</u>																				
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Complete the following information for each outfall inspected (items 10 through 15)

VISUAL INSPECTION OF OUTFALL NUMBER 003

10. Description of area(s) that drains to outfall. Most precipitation is absorbed into the ground via grass areas. Water draining off the paved areas and buildings is directed into the 8' wide by 780' long paved drainage ditch to a grass area near Outfall 003. All of the headworks impervious area water is collected by catch basins and discharged into the rain garden/vegetated swale. Overflow is directed to the grass area near 003.

11. Description of stormwater management practices, erosion and sedimentation control practices, and other structural control measures that are in place to control pollutants from running off-site.

The rain garden, vegetated swale, and paved areas are inspected after every rain event over 0.25". Rock areas are in place around the paved drainage ditch to reduce detritus from runoff. An emergency spill kit is available to contain accidental spills.

12. Is there visible flow from the pipe? ☐ Yes ☒ No (Go to number 14) Pipe Dia. (inches) 30"

- | | |
|--|-------------|
| a. ODOR: Chemical Musty Sewage Rotten Eggs | Other _____ |
| b. COLOR: Clear Red Yellow Brown | Other _____ |
| c. CLARITY: Clear Cloudy Opaque Suspended Solids | Other _____ |
| d. FLOATABLES: Suds Oily Film Garbage Sewage | Other _____ |
| e. DEPOSITS/STAINS: None Oily Sediment | Other _____ |
| f. VEGETATION: None Normal Excessive Inhibited | Other _____ |

13. Is there standing water present? ☐ Yes ☒ No (Go to number 16)

- | | |
|--|-------------|
| a. ODOR: Chemical Musty Sewage Rotten Eggs | Other _____ |
| b. COLOR: Clear Red Yellow Brown | Other _____ |
| c. CLARITY: Clear Cloudy Opaque Suspended Solids | Other _____ |
| d. FLOATABLES: Suds Oily Film Garbage Sewage | Other _____ |
| e. DEPOSITS/STAINS: None Oily Sediment | Other _____ |
| f. VEGETATION: None Normal Excessive Inhibited | Other _____ |

14. Is there any evidence of or potential for any pollutant being discharged at this outfall? ☐ Yes ☒ No

Describe: Grass areas and rock zones are in place to catch potential pollutants that may find their way towards Outfall 003.

If yes, identify substances present in the sediment (if possible). _____

15. Description of corrective measures taken or planned to remove sediments or debris if found during inspection. Please provide a schedule if actions are planned.

The paved drainage ditch is cleaned twice a year and as needed when sediment accumulates. The rain garden/vegetated swale/catch basins are inspected quarterly and after every rainfall over 0.25". Mulch is added to the rain garden as needed.

COMPREHENSIVE SITE COMPLIANCE EVALUATION

16. Do drainage maps reflect current conditions?

☒ Yes ☐ No

If no, provide your comments.

Comments: _____

17. Based on review of PPC Plan (including Housekeeping Measures), are any changes, corrections or updates necessary?

☐ Yes ☒ No

If yes, provide your comments.

Comments: _____

18. Have you inspected all structural stormwater controls used to implement the PPC Plan to determine if they are adequate?

☒ Yes ☐ No

If no, provide your comments.

Comments: _____

19. Have you inspected the entire site to determine if erosion and sedimentation control measures are adequate?

☒ Yes ☐ No

If no, provide your comments.

Comments: _____

20. Summarize corrective actions/measures completed or planned to correct any deficiencies found as a result of the inspection. Please provide a schedule if actions are planned.

21. Signature of Inspector

Name of Inspector: Brittany Laninger

Date Report Prepared: 9/30/2020

Signature of Inspector: Brittany Laninger

24. Signature of Owner/Operator of Facility

Name/Title Principal Executive Officer

Signature

Date

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 Pa. C.S. §4904 (relating to unsworn falsification).

Appendix B

National Pollutant Discharge Elimination
System (NPDES) Individual Permit To Discharge
Stormwater From Small Municipal Separate
Storm Sewer Systems (MS4s) NPDES Permit
No. PAI134813



November 25, 2020

City of Williamsport Joint Client
245 W 4th Street
Williamsport, PA 17701-6113

Re: Final NPDES Permit – MS4
MS4 Joint Permit Williamsport City Loyalsock
Township Lycoming County
NPDES Permit No. PAI134813
Authorization ID No. 1248531
Williamsport City, Lycoming County

Dear Permittees:

Your NPDES permit is enclosed. Please read the permit carefully. The permit expires on the date identified on page 1 of the permit. A renewal application must be submitted to this office 180 days prior to the permit expiration date.

The submission of Annual MS4 Status Reports is required by the permit. You must submit annual reports to the DEP office that issued the permit by September 30th of each year to describe activities conducted under the permit during the period of July 1 – June 30.

DEP has reviewed your Pollutant Reduction Plan and hereby approves the Plan.

You are required to implement the load reduction requirements established in Appendix(ces) D and E of the permit within five years, and you must submit a report demonstrating that you have met these requirements as an attachment to the first Annual MS4 Status Report that is due following completion of the 5th year of permit coverage.

We would like to bring DEP's eNOTICE service to your attention. eNOTICE is a subscription service that provides options to receive notifications of DEP's activities such as the receipt of permit applications, comment periods for guidance and regulations, and stream redesignation evaluations. To sign up for an account, visit DEP's website (www.dep.pa.gov) and select Data and Tools – Tools – eNOTICE.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board
Rachel Carson State Office Building, Second Floor
400 Market Street

P.O. Box 8457
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <http://ehb.courtapps.com> or by contacting the Secretary to the Board at 717-787-3483. The Notice of Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.

If you have any questions, please contact Jonathan Peterman at 570.327.3689.

Sincerely,

Thomas M. Randis

Thomas M. Randis
Environmental Program Manager
Clean Water Program

Enclosures: NPDES Permit, Supplemental Reports

cc: File
Central Office, Division of Operations



**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 INDIVIDUAL PERMIT TO DISCHARGE STORMWATER FROM
 SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)**

NPDES PERMIT NO. PA1134813

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.,

City of Williamsport
245 West Fourth Street
Williamsport, PA 17701

Loyalsock Township
2501 East Third Street
Williamsport, PA 17701

is authorized to discharge from a regulated small municipal separate storm sewer system (MS4) located in **City of Williamsport and Loyalsock Township, Lycoming County to Millers Run (WWF, MF), Daugherty Run (WWF, MF), Grafius Run (WWF), West Branch Susquehanna River (WWF), UNT to Lycoming Creek (WWF, MF), and UNT to West Branch Susquehanna River (WWF)** in Watershed(s) **10-A and 10-B** in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

THIS PERMIT SHALL BECOME EFFECTIVE ON DECEMBER 1, 2020

THIS PERMIT SHALL EXPIRE AT MIDNIGHT ON NOVEMBER 30, 2025

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

1. The permittee shall comply with the effluent limitations and reporting requirements contained in this permit.
2. The application and its supporting documents are incorporated into this permit. If there is a conflict between the application, its supporting documents and/or amendments and the terms and conditions of this permit, the terms and conditions shall apply.
3. Failure to comply with the terms, conditions or effluent limitations of this permit is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (40 CFR 122.41(a))
4. A complete application for renewal of this permit, or notice of intent to cease discharging by the expiration date, must be submitted to DEP at least 180 days prior to the above expiration date (unless permission has been granted by DEP for submission at a later date), using the appropriate NPDES permit application form (40 CFR 122.41(b), 122.21(d)). In the event that a timely and complete application for renewal has been submitted and DEP is unable, through no fault of the permittee, to reissue the permit before the above expiration date, the terms and conditions of this permit, including submission of the Annual MS4 Status Reports, will be automatically continued and will remain fully effective and enforceable against the discharger until DEP takes final action on the pending permit application. (25 Pa. Code §§ 92a.7(b), (c))
5. The permittee shall implement Pollutant Control Measures as specified in **Appendix(ces) C**.
6. The permittee shall achieve pollutant loading reductions for **sediment** as specified in **Appendix(ces) D and E** by **December 1, 2025**.

Date Permit Issued: November 25, 2020

Issued By: Thomas M. Randis
Thomas M. Randis
Environmental Program Manager
Northcentral Regional Office

PART A

EFFLUENT LIMITATIONS, REPORTING AND RECORDKEEPING REQUIREMENTS

I. EFFLUENT LIMITATIONS

- A. This permit establishes effluent limitations in the form of implementation of a Stormwater Management Program (SWMP), as specified in Part C I of this permit, to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable. The permittee shall comply with Minimum Control Measures (MCMs) and best management practices (BMPs) in Part C I of this permit, which constitutes compliance with the standard of reducing pollutants to the maximum extent practicable.
- B. All discharges from regulated small MS4s must comply with all applicable requirements established in accordance with 25 Pa. Code Chapters 91-96, 102, and 105 of DEP's rules and regulations. DEP may, upon written notice, require additional BMPs or other control measures to ensure that the water quality standards of the surface waters receiving stormwater discharges are attained.

II. DEFINITIONS

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce pollutant loading to surface waters of this Commonwealth. The term includes treatment requirements, operating procedures and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. The term includes activities, facilities, measures, planning or procedures used to minimize accelerated erosion and sedimentation and manage stormwater to protect, maintain, reclaim and restore the quality of waters and the existing and designated uses of waters within this Commonwealth before, during and after earth disturbance activities. (25 Pa. Code § 92a.2)

Clean Water Act (CWA) means the Federal Water Pollution Control Act, as amended, 33 U.S.C.A. §§ 1251 - 1387.

Cleaning Agent means any product, substance or chemical other than water that is used to clean the exterior surface of vehicles.

Designated Uses are those uses specified in 25 Pa. Code §§ 93.4(a) and 93.9a – 93.9z for each water body or segment whether or not they are being attained. (25 Pa. Code § 93.1)

Dry Weather means a condition in which there are no precipitation, snowmelt, drainage or other events producing a stormwater discharge for more than 48 consecutive hours.

Existing Permittee means any entity that has been designated as a regulated small MS4 and has previously obtained permit coverage under the PAG-13 Permit or obtained an Individual NPDES MS4 Permit.

Existing Uses are those uses actually attained in the water body on or after November 28, 1975, whether or not they are included in the water quality standards. (25 Pa. Code § 93.1)

Illicit Connection means any physical connection to a municipal separate storm sewer system that can convey illicit discharges into the system and/or is not authorized or permitted by the permittee.

Illicit Discharge means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except non-stormwater discharges as described in the "Discharges Authorized by this Permit" section of this Permit. Examples of illicit discharges include dumping of motor vehicle fluids, household hazardous wastes, grass clippings, leaf litter, animal wastes, or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-stormwater waste into a municipal separate storm sewer system. Illicit discharges can be accidental or intentional.

Impaired Waters means surface waters that fail to attain one or more of its designated uses under 25 Pa. Code Chapter 93 and as listed in Categories 4 and 5 of Pennsylvania's Integrated Water Quality Monitoring and Assessment Report.

Integrated Water Quality Monitoring and Assessment Report means the report published every other year by DEP to report on the conditions of Pennsylvania's surface waters to satisfy sections 305(b) and 303(d) of the CWA.

Intermittent Stream means a body of water flowing in a channel or bed composed primarily of substrates associated with flowing water, which, during periods of the year, is below the local water table and obtains its flow from both surface runoff and groundwater discharges. (25 Pa. Code § 92a.2)

Load Allocation means the portion of a surface water's loading capacity that is assigned or allocated to existing and future nonpoint sources and natural quality. (25 Pa. Code § 96.1)

Low Impact Development (LID) means site design approaches and small-scale stormwater management practices that promote the use of natural systems for infiltration, evapotranspiration, and reuse of rainwater. LID can be applied to new development, urban retrofits, and revitalization projects. LID utilizes design techniques that infiltrate, filter, evaporate, and store runoff close to its source. Rather than rely on costly large-scale conveyance and treatment systems, LID addresses stormwater through a variety of small, cost-effective landscape features located on-site.

MS4 Requirements Table is a compilation of information regarding Pennsylvania MS4s, surface waters that receive stormwater discharges from MS4s, surface water impairments and TMDLs that is posted to DEP's website, www.dep.pa.gov/MS4. The MS4 Requirements Table has been assembled by DEP to assist MS4 permittees in determining applicable requirements for the development of plans and implementation of BMPs.

Municipal separate storm sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to surface waters; (ii) Designed or used for collecting or conveying stormwater; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(8))

Municipal Separate Storm Sewer System (MS4) means all separate storm sewers that are defined as "large" or "medium" or "small" municipal separate storm sewer systems pursuant to 40 CFR §§ 122.26(b)(4), (b)(7), and (b)(16), respectively, or designated under 40 CFR § 122.26(a)(1)(v). (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(18))

Municipality means a city, town, borough, county, township, school district, institution, authority or other public body created by or pursuant to State law and having jurisdiction over disposal of sewage, industrial wastes or other wastes. (25 Pa. Code § 92a.2)

New Permittee means any entity that has been designated as a regulated small MS4 and has not previously obtained permit coverage under the PAG-13 General Permit or obtained an Individual NPDES MS4 Permit.

Non-Municipal Permittee means a regulated small MS4 that is not a municipality, e.g., military bases, large hospital or prison complexes, and highways and other thoroughfares.

Non-Structural BMPs means actions that involve management and source controls such as: (1) policies and ordinances that provide requirements and standards to direct growth to identified areas, promote redevelopment, protect areas such as wetlands and riparian areas, maintain and/or increase open space, provide buffers along water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; (2) education programs for developers and the public about minimizing water quality impacts; (3) measures such as minimizing the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, street sweeping, and source control measures such as good housekeeping, maintenance, and spill prevention; and other BMPs as referenced in Chapter 5 of the Pennsylvania Stormwater BMP Manual (363-0300-002).

Observation point means a location upstream of an outfall where a permittee must conduct dry weather screening in accordance with Part C I.B.3.d of this permit if the permittee determines that screening at an outfall is infeasible, and the point at which stormwater discharges to storm sewers owned or operated by an adjoining municipality where dry weather screening must be conducted.

Ordinance means a law enacted by the government of a municipality.

Outfall means a point source as defined by 40 CFR § 122.2 at the point where a municipal separate storm sewer discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(9))

Owner or Operator means the owner or operator of any “facility” or “activity” subject to regulation under the NPDES program. (25 Pa. Code § 92a.3(b)(1) and 40 CFR § 122.2)

Permittee means the owner or operator of a regulated small MS4 authorized to discharge under the terms of this permit.

Point Source means a discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, Concentrated Aquatic Animal Production Facility (CAAP), Concentrated Animal Feeding Operation (CAFO), landfill leachate collection system, or vessel or other floating craft from which pollutants are or may be discharged. (25 Pa. Code § 92a.2)

Pollutant means any contaminant or other alteration of the physical, chemical, biological, or radiological integrity of surface water which causes or has the potential to cause pollution as defined in section 1 of the Pennsylvania Clean Streams Law, 35 P.S. § 691.1. (25 Pa. Code § 92a.2)

Qualifying Development or Redevelopment Project means an earth disturbance activity that requires an NPDES permit for stormwater discharges associated with construction activity per 25 Pa. Code Chapter 102.

Regulated Small MS4 means any small MS4 that is covered by the federal Phase II stormwater program, either through automatic nationwide designation under 40 CFR § 122.32(a)(1) (via the Urbanized Area criteria) or by designation on a case-by-case basis by DEP pursuant to 40 CFR § 122.32(a)(2). “Regulated small MS4s” are a subset of “small MS4s” as defined in this section.

Riparian Forest Buffer means an area of permanent vegetation consisting of native trees, shrubs, forbs and grasses along surface water that is maintained in a natural state or sustainably managed to protect and enhance water quality, stabilize stream channels and banks, and buffer land use activities from surface waters.

Small Municipal Separate Storm Sewer System (Small MS4) means an MS4, as defined in this section, that is not a large or medium MS4 pursuant to 40 CFR §§ 122.26(b)(4) and 122.26(b)(7). The term small MS4 includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(16))

Standard Operating Procedure (SOP) means a policy or set of procedures that are enacted by a non-municipal

permittee to implement a stormwater management program.

Storm Sewershed means the land area that drains to an individual MS4 outfall from within the jurisdiction of the MS4 permittee. The term “combined storm sewershed” means the drainage areas of all MS4 outfalls that discharge to a specific surface water or to waters within the Chesapeake Bay watershed.

Stormwater means runoff from precipitation, snow melt runoff and surface runoff and drainage. “Stormwater” has the same meaning as “storm water.” (25 Pa. Code § 92a.2)

Structural BMPs means stormwater storage and management practices including, but not limited to, wet ponds and extended detention outlet structures; filtration practices such as grassed swales, sand filters and filter strips; infiltration practices such as infiltration basins and infiltration trenches; and other BMPs as referenced in Chapter 6 of the Pennsylvania Stormwater BMP Manual (363-0300-002).

Surface Waters means perennial and intermittent streams, rivers, lakes, reservoirs, ponds, wetlands, springs, natural seeps and estuaries, excluding water at facilities approved for wastewater treatment such as wastewater treatment impoundments, cooling water ponds and constructed wetlands used as part of a wastewater treatment process. (25 Pa. Code § 92a.2)

Total Maximum Daily Load (TMDL) means the sum of individual waste load allocations for point sources, load allocations for nonpoint sources and natural quality and a margin of safety expressed in terms of mass per time, toxicity or other appropriate measures. (25 Pa. Code § 96.1)

Urbanized Area (UA) means land area comprising one or more places (central place(s)) and the adjacent densely settled surrounding area (urban fringe) that together have a residential population of at least 50,000 and an overall population density of at least 1,000 people per square mile, as defined by the United States Bureau of the Census and as determined by the latest available decennial census. The UA outlines the extent of automatically regulated areas.

Wasteload Allocation (WLA) means the portion of a surface water’s loading capacity that is allocated to existing and future point source discharges. (25 Pa. Code § 96.1)

Water Quality Criteria means numeric concentrations, levels or surface water conditions that need to be maintained or attained to protect existing and designated uses. (25 Pa. Code § 93.1)

Water Quality Standards means the combination of water uses to be protected and the water quality criteria necessary to protect those uses. (25 Pa. Code § 92a.2)

III. MONITORING, REPORTING AND RECORDKEEPING

- A. Where samples are collected and analyzed or measurements are taken under this permit, 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))
- B. Records Retention – All records of monitoring activities and results, copies of all plans and reports required by this Permit, and records of all data used to complete the application for this Permit shall be retained by the permittee for at least 5 years from the date of the sample measurement, report or application. 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))
- C. Proper Operation and Maintenance (O&M) – The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances), including stormwater BMPs, that are installed or used by the permittee to achieve compliance with the conditions of this permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(e))
- D. Reporting and Fee Requirements
 1. The permittee shall submit a complete Annual MS4 Status Report using DEP's annual report template (3800-FM-BPNPSM0491) to the DEP regional office that issued Permit coverage approval by September 30 of each year.
 - a. For existing permittees, the first annual report submitted to DEP under this permit shall have a reporting period starting from the end of the latest annual or progress report period (under the previous permit) to June 30, 2021. The first annual report is due by September 30, 2021. For new permittees, the first annual report is due by September 30 following the first year of Permit coverage.
 - b. Following the first annual report, the reporting period shall thereafter be July 1 - June 30, and the report shall be due by September 30.
 2. Permittees shall pay an annual fee of \$500 in accordance with 25 Pa. Code § 92a.62. Annual fees are due on each anniversary of the effective date of the most recent new or reissued permit. Payment for annual fees shall be remitted to DEP at the address below by the anniversary date. Checks should be made payable to the Commonwealth of Pennsylvania.

PA Department of Environmental Protection
Bureau of Clean Water
Re: Chapter 92a Annual Fee
PO Box 8466
Harrisburg, PA 17105-8466
 3. The permittee shall submit the Annual MS4 Status Report and annual fee to DEP electronically upon receipt of written notification from DEP.
 4. Unanticipated Non-Compliance or Potential Pollution Reporting
 - a. Immediate Reporting - The permittee shall immediately report any incident causing or threatening pollution in accordance with the requirements of 25 Pa. Code §§ 91.33 and 92a.41(b) listed below:
 - (i) If, because of an accident, other activity or incident a toxic substance or another substance which would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, the permittee shall immediately notify DEP by telephone of the location and nature of the danger. Oral notification to the Department is required as soon as possible, but no later than 4 hours after the permittee becomes aware of the incident causing or threatening pollution.

- (ii) If reasonably possible to do so, the permittee shall immediately notify downstream users of the waters of the Commonwealth to which the substance was discharged. Such notice shall include the location and nature of the danger.
 - (iii) The permittee shall immediately take or cause to be taken steps necessary to prevent injury to property and downstream users of the waters from pollution or a danger of pollution and, in addition, within 15 days from the incident, shall remove the residual substances contained thereon or therein from the ground and from the affected waters of this Commonwealth to the extent required by applicable law.
- b. The permittee shall report any non-compliance which may endanger health or the environment in accordance with the requirements of 40 CFR § 122.41(l)(6). These requirements include the following obligations:
 - (i) 24 Hour Reporting - The permittee shall orally report any non-compliance with this permit which may endanger health or the environment within 24 hours from the time the permittee becomes aware of the circumstances.
 - (ii) Written Report - A written submission shall also be provided within 5 days of the time the permittee becomes aware of any non-compliance which may endanger health or the environment. The written submission shall contain a description of the non-compliance and its cause; the period of non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance.
 - (iii) Waiver of Written Report - DEP may waive the written report on a case-by-case basis if the associated oral report has been received within 24 hours from the time the permittee becomes aware of the circumstances which may endanger health or the environment. Unless such a waiver is expressly granted by DEP, the permittee shall submit a written report in accordance with this paragraph. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(6)(iii))

5. Other Non-Compliance

The permittee shall report all instances of non-compliance not reported under paragraph D.4 of this section at the time Annual Reports are submitted, on the Non-Compliance Reporting Form (3800-FM-BPNPSM0440). The reports shall contain the information listed in paragraph D.4.b.(ii) of this section. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(7))

6. Signatory Requirements

- a. Completed Annual Reports and all other reports, applications, and information submitted to DEP shall be signed and certified by either of the following applicable persons, as defined in 25 Pa. Code § 92a.22:
 - For a corporation - by a principal executive officer of at least the level of vice president, or an authorized representative, if the representative is responsible for the overall operation of the facility from which the discharge described in the NPDES form originates.
 - For a partnership or sole proprietorship - by a general partner or the proprietor, respectively.
 - For a municipality, state, federal or other public agency - by a principal executive officer or ranking elected official.
- b. If signed by a person other than the above, the person must be a duly authorized representative of the permittee. A person is a duly authorized representative only if:
 - The authorization is made in writing by a person described in paragraph a., above, and submitted to DEP.
 - The authorization specifies either an individual or a position having responsibility for the operation of the regulated system, facility or activity, such as the position of manager, operator,

superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position.

- c. Changes in Signatory Authorization - If an authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the system or facility, a new authorization satisfying the requirements of paragraphs 6.a and 6.b, above, must be submitted to DEP prior to or together with any reports, information or NOI to be signed by an authorized representative.

PART B

STANDARD CONDITIONS

I. MANAGEMENT REQUIREMENTS

A. Compliance

The permittee must comply with all conditions of this Permit. Any permit non-compliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(a))

B. Permit Modification, Termination, or Revocation and Reissuance

1. Permit coverage may be modified, terminated, or revoked and reissued during its term in accordance with Title 25 Pa. Code §§ 92a.72 and 92a.74 and 40 CFR § 122.41(f).
2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated non-compliance, does not stay any Permit condition. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(f))

C. Duty to Provide Information

1. The permittee shall furnish to DEP, within a reasonable time, any information which DEP may request to determine whether cause exists for modifying, revoking and reissuing, or terminating coverage under this Permit, or to determine compliance with this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(h))
2. The permittee shall furnish to DEP, upon request, copies of records required to be kept by this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(h))
3. Other Information - Where the permittee becomes aware that it failed to submit any relevant facts in an NOI, or submitted incorrect information in an NOI or in any report to DEP, it shall promptly submit the correct and complete facts or information. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(8))
4. The permittee shall give advance notice to the DEP office that approved permit coverage of any planned physical alterations or additions to the regulated small MS4. Notice is only required when: 1) the alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR § 122.29(b), or 2) the alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l))

D. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit that has a reasonable likelihood of adversely affecting human health or the environment. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(d))

E. Termination of Permit Coverage (25 Pa. Code § 92a.74 and 40 CFR 122.64)

1. Notice of Termination (NOT) – If the permittee plans to cease operations or will otherwise no longer require coverage under this permit, the permittee shall submit DEP's NPDES Notice of Termination (NOT) for Permits Issued Under Chapter 92a (3800-BCW-0410), signed in accordance with Part A III.D.6 of this permit, at least 30 days prior to cessation of operations or the date by which coverage is no longer required.
2. Where the permittee plans to cease operations, NOTs must be accompanied with an operation closure plan that identifies how tankage and equipment will be decommissioned and how pollutants will be managed, as applicable.
3. The permittee shall submit the NOT to the DEP regional office with jurisdiction over the county in which the facility is located.

II. PENALTIES AND LIABILITY

A. Violations of Permit Conditions

1. Any person violating Sections 301, 302, 306, 307, 308, 318 or 405 of the CWA or any permit condition or limitation implementing such sections in a permit issued under Section 402 of the Act is subject to civil, administrative and/or criminal penalties as set forth in 40 CFR § 122.41(a)(2).
2. Any person or municipality, who violates any provision of this Permit; any rule, regulation or order of DEP; or any condition or limitation of any permit issued pursuant to the Clean Streams Law, is subject to criminal and/or civil penalties as set forth in Sections 602, 603 and 605 of the Clean Streams Law.

B. Falsifying Information

Any person who does any of the following:

- Falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, or
- Knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit (including monitoring reports or reports of compliance or non-compliance)

Shall, upon conviction, be punished by a fine and/or imprisonment as set forth in 18 Pa.C.S.A. § 4904 and 40 CFR §§ 122.41(j)(5) and (k)(2).

C. Liability

1. Nothing in this Permit shall be construed to relieve the permittee from civil or criminal penalties for non-compliance pursuant to Section 309 of the CWA or Sections 602, 603 or 605 of the Clean Streams Law.
2. Nothing in this Permit shall be construed to preclude the institution of any legal action or to relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject to under the CWA and the Clean Streams Law.

D. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(c))

III. OTHER RESPONSIBILITIES

A. Right of Entry

Pursuant to Section 5(b) of Pennsylvania's Clean Streams Law (35 P.S. § 691.5(b)), 25 Pa. Code Chapter 92a and 40 CFR § 122.41(i), the permittee shall allow authorized representatives of DEP and EPA, upon the presentation of credentials and other documents as may be required by law:

1. To enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(1))
2. To have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(2))
3. To inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this Permit; and (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(3))
4. To sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act or the Clean Streams Law, any substances or parameters at any location. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(4))

B. Transfer of Permits

1. Transfers by modification. Except as provided in paragraph B.2 of this section, permit coverage may be transferred by the permittee to a new owner or operator only if this Permit coverage has been modified or revoked and reissued, or a minor modification made to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(a))
 2. Automatic transfers. As an alternative to transfers under paragraph 1 of this section, any NPDES permit may be automatically transferred to a new permittee if:
 - a. The current permittee notifies DEP at least 30 days in advance of the proposed transfer date in paragraph 2.b. of this section; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(1))
 - b. The notice includes the appropriate DEP transfer form signed by the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between them; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(2))
 - c. DEP does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue coverage under this permit, the transfer is effective on the date specified in the agreement mentioned in paragraph 2.b. of this section; and (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(3))
 - d. The new permittee is in compliance with existing DEP issued permits, regulations, orders and schedules of compliance, or has demonstrated that any non-compliance with the existing permits has been resolved by an appropriate compliance action or by the terms and conditions of the permit (including compliance schedules set forth in the permit), consistent with 25 Pa. Code § 92a.51 (relating to schedules of compliance) and other appropriate DEP regulations. (25 Pa. Code § 92a.71)
 3. In the event DEP does not approve transfer of coverage under this permit, the new owner or controller must submit a new NOI.
- C. Property Rights – The approval of coverage under this Permit does not convey any property rights of any sort, or any exclusive privilege. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(g))

- D. Duty to Reapply – If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for a new permit. (40 CFR 122.41(b))
- E. Severability – The provisions of this permit are severable. If any provision of this permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected.

PART C

SPECIAL CONDITIONS

I. 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 September 30 each year.

B. 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 community 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) For new permittees, 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.

- (2) For existing permittees, the existing PEOP shall be reviewed annually and revised as necessary.

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 regulated small MS4. In most communities, the target audiences shall include residents, businesses (including commercial, industrial and retailers), developers, schools, and municipal employees.

- (1) For new permittees, the lists shall be developed within one year following issuance of this permit, and reviewed and updated as necessary every year thereafter.

- (2) For existing permittees, the lists shall continue to be reviewed and updated annually.

- 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) For new permittees, stormwater educational and informational items shall be produced and published in print and/or on the Internet no later than one year following issuance of this permit.

(2) In subsequent years, and for existing permittees, 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, radio, local cable TV, newspaper articles, other advertisements (e.g., at bus and train stops/stations), bill stuffers, 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 public's input.

The PIPP for new permittees shall be developed and implemented within one year 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 public 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 regulated small MS4s or surface waters receiving the permittee's discharges.

(3) Making Annual MS4 Status Reports and all other plans, programs, maps and reports required by this permit available to the public on the permittee's website, at the permittee's office(s), or by mail upon request.

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

- Stormwater Management Ordinances (for municipalities);
- Standard Operating Procedures (SOPs) (for non-municipal entities); and
- Pollutant Reduction Plans (PRPs) and TMDL Plans, including modifications thereto.

(1) For Ordinances and SOPs, the permittee shall provide notice to the public; provide opportunities for public comment; document and evaluate the public 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.

- (2) For PRPs and TMDL Plans, public participation requirements are specified in Appendices D, E and F of this Permit.
- c. **BMP #3:** Regularly solicit public involvement and participation from the target audience groups using available distribution and outreach methods. This shall include an effort to solicit public reporting of suspected illicit discharges. Assist the public in their efforts to help implement the SWMP.
 - (1) The permittee shall solicit public involvement and participation from target audience groups on the implementation of the SWMP. The solicitation can take the form of public meetings or other events. The public shall be given notice in advance of each meeting or event. During the meetings or events, the permittee should present a summary of progress, activities, and accomplishments with implementation of the SWMP, and the permittee should provide opportunities for the public to provide feedback and input. The presentation can be made at specific MS4 events or during any other public meeting. Existing permittees shall conduct at least one public meeting that includes information on SWMP implementation by March 15, 2023; new permittees shall conduct at least one public meeting within 5 years following issuance of this permit.
 - (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 public 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 regulated small MS4.

- a. **BMP #1:** The permittee shall develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated small 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 regulated small 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) For new permittees, 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.
- (2) For existing permittees, the IDD&E program shall continue to be implemented and evaluated annually.
- 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) For new permittees, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report by September 30, 2024 or the fourth (4th) Annual MS4 Status Report following issuance of this permit, whichever is later.
- (2) For existing permittees, the existing 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) For new permittees, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report by September 30, 2024 or the fourth (4th) Annual MS4 Status Report following issuance of this permit, whichever is later.
- (2) For existing permittees, the existing 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 public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. 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.D.4 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) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
- (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by November 30, 2025. 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.
- (3) 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 A III.B of this permit.

- (4) 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 A III.B 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.
 - (5) The permittee shall summarize the results of outfall inspections and actions taken to remove or correct illicit discharges in Annual MS4 Status Reports.
 - (6) 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.
 - (7) Permittees must ensure that outfalls are properly maintained in accordance with Part C I.B.6.b of this Permit.
- e. **BMP #5:** Enact a Stormwater Management Ordinance or SOP to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated small MS4.
- (1) Municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, **2024** (existing permittees) or the fourth (4th) Annual MS4 Status Report following approval of coverage under this Permit (new permittees).
 - (2) Permittees that lack the authority to enact ordinances (non-municipal permittees and counties) shall develop and adopt an SOP that prohibits non-stormwater discharges consistent with this Permit, and shall submit a copy of the SOP as an attachment to an Annual MS4 Status Report by September 30, **2024** (existing permittees) or the fourth (4th) Annual MS4 Status Report following approval of coverage under this Permit (new permittees).

- (3) 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 ordinance or 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 public employees, business owners and employees, property owners, the general public and elected officials (i.e., 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 building or other permit or 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:** A municipality or county which issues building or other permits shall notify DEP or the applicable county conservation district (CCD) within 5 days of the receipt of an application for a permit involving an earth disturbance activity consisting of one acre or more, in accordance with 25 Pa. Code § 102.42.
- c. **BMP #3:** Enact, implement and enforce an ordinance or SOP to require the implementation and maintenance of E&S control BMPs, including sanctions for non-compliance, as applicable.
 - (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of E&S control BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, **2024** (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees).
 - (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of E&S control BMPs by September 30, **2024** (existing permittees) or the first Annual MS4 Status Report following approval of coverage under this Permit (new permittees).

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 ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.
- (1) Municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. All municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, **2024** (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees).
- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, **2024** (existing permittees) or the fourth (4th) Annual MS4 Status Report following issuance of this permit (new permittees).
- 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. Enact ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices. Submission of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) will satisfy this BMP.
- 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 new permittees 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. Existing permittees shall update and maintain its current 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 regulated small 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; municipal 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) New permittees 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 regulated small MS4 by the end of the first year of permit coverage, and review and update the inventory annually thereafter.

(2) All permittees must review and update the inventory each year of permit coverage, as necessary.

- 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 regulated small MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated 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 regulated small MS4s. 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 regulated small MS4s.
- 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 for existing salt storage and distribution sites contained in the PAG-03 NPDES Permit for Stormwater Discharges Associated with Industrial Activity.
- 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) New permittees shall develop and implement a written O&M program by the end of the first year of permit coverage and review and update the program each year thereafter.

- (2) All permittees must review and update the written O&M program each year of permit coverage, as necessary.
- 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 regulated small 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., public works staff, building, zoning, and code enforcement 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) New permittees 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 permit coverage.
 - (2) All permittees 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).

II. POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS

Permittees with coverage under this permit that discharge to impaired waters are required to implement Pollutant Control Measures (PCMs) and Pollutant Reduction Plans (PRPs), as applicable. Permittees are encouraged to consult DEP's MS4 Requirements Table, available at www.dep.pa.gov/MS4, to determine the applicability of PCMs under Appendices A, B, and C and PRPs under Appendices D and E of this Permit.

- A. PCMs are activities undertaken by the MS4 permittee to identify and control pollutant loading to impaired waters from MS4s, regardless of whether a TMDL has been approved. PCMs are BMPs and other strategies that are in addition to the permittee's SWMP identified in Part C I of this Permit. PCMs must be implemented where the permittee 1) has at least one stormwater outfall that discharges to impaired waters, and 2) the "cause of impairment" is one or more of the causes listed in paragraphs A.1 through A.3, below.
 1. Where surface waters are impaired for metals (e.g., Iron, Manganese and Aluminum) and/or pH associated with Abandoned Mine Drainage (AMD), the permittee shall implement the PCMs identified in **Appendix A** of this permit, in accordance with the schedule therein.
 2. Where surface waters are impaired for Pathogens (e.g., Fecal Coliform), the permittee shall implement the PCMs identified in **Appendix B** of this permit, in accordance with the schedule therein.
 3. Where surface waters are impaired for Priority Organic Compounds (e.g., Polychlorinated Biphenyls (PCBs), pesticides, or other organic compounds), the permittee shall implement the PCMs identified in **Appendix C** of this permit, in accordance with the schedule therein.
- B. A PRP is a planning document prepared by the permittee which guides the selection and implementation of specific BMPs to reduce pollutant loading to surface waters. The objective of a PRP is to improve the condition of surface waters such that the waters eventually attain water quality standards and its designated and existing uses in accordance with 25 Pa. Code Chapter 93. A PRP shall be developed and submitted to DEP with the application if one or more of the following criteria are met:

1. At the time of the application submission, the permittee has at least one MS4 outfall that discharges to surface waters within the Chesapeake Bay watershed, or otherwise has at least one discharge to storm sewers owned or operated by a different entity within the Chesapeake Bay watershed. Where these conditions apply, upon DEP's issuance of this permit, the permittee shall implement the PRP in accordance with **Appendix D** of this permit.
2. At the time of the application submission, the permittee has at least one stormwater outfall that discharges to waters impaired for nutrients (i.e., nitrogen and/or phosphorus) and/or sediment (i.e., siltation), and a TMDL has not been approved for such waters, or a TMDL has been approved but no wasteload allocation (WLA) has been assigned by the TMDL for the permittee's discharge(s). Where these conditions apply, upon DEP's issuance of this permit, the permittee shall implement the PRP in accordance with **Appendix E** of this permit.

III. TMDL PLANS

A TMDL Plan is a planning document prepared by the permittee which guides the selection and implementation of specific BMPs to reduce pollutant loading to surface waters and comply with the TMDL. A TMDL Plan shall be developed and submitted to DEP with the individual permit application if all of the following criteria are met: 1) the permittee has at least one MS4 outfall that discharges to surface waters with an EPA-approved TMDL; 2) the permittee has been identified in the TMDL as having a wasteload allocation (WLA) for one or more pollutants, where the WLA may be specific (individual) to the permittee or may be presented as an aggregate (bulk) requirement for all MS4s within a watershed; and 3) the WLA(s) are for sediment and/or nutrients (i.e., Total Nitrogen and/or Total Phosphorus). Where these conditions apply, upon DEP's issuance of this permit, the permittee shall implement the TMDL Plan in accordance with **Appendix F** of this permit.

IV. OTHER REQUIREMENTS

- A. Screenings and other solids collected by the permittee 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), federal regulation 40 CFR Part 257, The Clean Streams Law, and the Federal Clean Water Act and its amendments.
- B. DEP may require monitoring of stormwater discharge(s) as may be reasonably necessary in order to characterize the nature, volume or other attributes of that discharge or its sources.
- C. The permittee shall ensure that its SWMP, including its Stormwater Management Ordinance(s) or SOPs, is designed to prevent increased loadings of pollutants and to not cause or contribute to a violation of water quality standards by any discharge from its regulated small MS4.
- D. The permittee shall develop and maintain adequate legal authorities, where applicable, and shall maintain adequate funding and staffing to implement this Permit, including the SWMP contained in Part C I of this Permit.

- E. In accordance with 40 CFR § 122.35, the permittee may rely on another entity to satisfy NPDES permit obligations to implement a minimum control measure if: (1) the other entity, in fact, implements the control measure; (2) the particular control measure, or component thereof, is at least as stringent as the corresponding NPDES permit requirement; and (3) the other entity agrees to implement the control measure on the permittee's behalf. The permittee must specify in Annual MS4 Status Reports that it is relying on another entity to satisfy some of its NPDES permit obligations. The permittee remains responsible for compliance with permit obligations if the other entity fails to implement the control measure (or component thereof).
- F. This permit authorizes the discharge of stormwater to surface waters from the permittee's regulated small MS4. In addition, the following non-stormwater discharges are authorized by this permit as long as such discharges do not cause or contribute to pollution as defined in Pennsylvania's Clean Streams Law:
1. Discharges or flows from firefighting activities.
 2. Discharges from potable water sources including water line flushing and fire hydrant flushing, if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).
 3. Non-contaminated irrigation water, water from lawn maintenance, landscape drainage and flows from riparian habitats and wetlands.
 4. Diverted stream flows and springs.
 5. Non-contaminated pumped ground water and water from foundation and footing drains and crawl space pumps.
 6. Non-contaminated HVAC condensation and water from geothermal systems.
 7. Residential (i.e., not commercial) vehicle wash water where cleaning agents are not utilized.
 8. Non-contaminated hydrostatic test water discharges, if such discharges do not contain detectable concentrations of TRC.
- G. In the event existing outfall(s) are identified during the permit term that were not identified on maps submitted as part of the application (where required), the permittee shall identify the outfall(s) in the subsequent Annual MS4 Status Report that is submitted to the DEP office that approved permit coverage. In the event new stormwater outfalls are proposed, the permittee shall submit written notification to the DEP office that issued the permit at least 60 days prior to commencing a discharge.

APPENDIX C

POLLUTANT CONTROL MEASURES FOR WATERS IMPAIRED BY PRIORITY ORGANIC COMPOUNDS

The permittee shall implement the following Pollutant Control Measures (PCMs) within the storm sewershed of any outfall that discharges to waters impaired due to Priority Organic Compounds, including but not limited to Polychlorinated Biphenyls (PCBs), Pesticides, and any other organic compound listed at 40 CFR Part 423, Appendix A, regardless of whether there is an approved TMDL:

A. Map and Inventory.

1. The permittee shall develop map(s) of the storm sewershed(s) associated with all outfalls that discharge to surface waters subject to Appendix C. The purpose is to identify the area the permittee is responsible for within its legal boundaries in developing a source inventory. The map(s) shall be submitted to DEP with an Annual MS4 Status Report that is due no later than **September 30, 2022**.
2. The permittee shall develop an inventory of all suspected and known anthropogenic (caused or produced by humans) sources of Priority Organic Compounds in stormwater within the drainage area of outfalls discharging to impaired waters. The inventory must identify whether the source is suspected or known, the basis for this determination, the responsible party (if known), and any corrective action the permittee has taken or plans to take for any of these sources. The inventory shall be submitted to DEP with an Annual MS4 Status Report that is due no later than **September 30, 2023**.

B. The permittee shall complete an investigation of each suspected source. This investigation must include stormwater sampling if the investigation is required as part of implementing the IDD&E program under MCM #3 of the Permit, and otherwise is voluntary. The results of the investigation shall be submitted to DEP with an Annual MS4 Status Report that is due no later than **September 30, 2024**.

C. Where it is determined that sources of Priority Organic Compounds are being discharged in stormwater from industrial sites into the permittee's MS4, the permittee shall notify DEP in writing within 90 days of the permittee's findings. DEP may require the owner or operator of the industrial site to submit an application for NPDES permit coverage and/or implement BMPs to reduce pollutant loadings. This written notification is required only once per industrial site.

D. The permittee shall document the progress of its investigations, source control efforts and BMPs to control sources of Priority Organic Compounds in its Annual MS4 Status Reports.

APPENDIX D

POLLUTANT REDUCTION PLAN REQUIREMENTS FOR DISCHARGES TO THE CHESAPEAKE BAY WATERSHED

MS4 permittees with at least one stormwater discharge to surface waters within the Chesapeake Bay watershed must develop and submit a Chesapeake Bay Pollutant Reduction Plan (CBPRP) with the application to reduce the load of nutrients (nitrogen and phosphorus) and sediment discharged to surface waters. In the event the permittee also has at least one stormwater discharge to local surface waters that are considered impaired for nutrients and/or sediment, the CBPRP may be combined with the PRP for localized nutrient and/or sediment impairment as described in Appendix E.

The CBPRP is approved upon DEP's issuance of this permit, subject to any conditions identified elsewhere in this permit or in permit correspondence. The permittee shall implement its approved CBPRP and comply with the following:

- A. The permittee shall achieve a sediment load reduction (lbs/year) of 10%, compared to existing loading, by **November 30, 2025**. Pollutant reduction efficiencies for selected BMPs shall be in accordance with the BMP Effectiveness Values document published by DEP (3800-PM-BCW0100m) or Chesapeake Bay Program Office expert panel reports. The permittee shall submit a report demonstrating implementation of the CBPRP as an attachment to the first Annual MS4 Status Report that is due following the expiration date of this permit.
- B. The BMPs proposed in the CBPRP for the term of permit coverage shall be implemented in accordance with the schedule in the CBPRP. In the event the permittee decides to modify the location, type or number of proposed BMPs, modify the storm sewershed map, or modify the schedule by more than 180 days, the permittee shall submit an update to its CBPRP to DEP prior to implementing the changes. The modified CBPRP may be implemented upon submission to DEP unless DEP issues an objection in writing within 60 days.
- C. Where submission of a modified CBPRP to DEP is required, the permittee shall solicit public involvement and participation, as follows:
 1. The permittee shall make a complete copy of the CBPRP available for public review.
 2. The permittee shall publish, in a newspaper of general circulation in the area, a public notice containing a statement describing the plan, where it may be reviewed by the public, and the length of time the permittee will provide for the receipt of comments. The public notice must be published at least 45 days prior to the deadline for submission of the PRP to DEP.
 3. The permittee shall accept written comments for a minimum of 30 days from the date of public notice.
 4. The permittee shall accept comments from any interested member of the public at a public meeting or hearing, which may include a regularly scheduled meeting of the governing body of the municipality or municipal authority that is the permittee.
 5. The permittee shall consider and make a record of the consideration of each timely comment received from the public during the public comment period concerning the plan, identifying any changes made to the plan in response to the comment.

Modified CBPRPs submitted to DEP must include a copy of the newspaper notice, a copy of all written comments received from the public and a copy of the permittee's record of consideration of all timely comments received in the public comment period.

- D. Progress with achieving the required pollutant load reductions shall be reported in each Annual MS4 Status Report.

APPENDIX E

POLLUTANT REDUCTION PLAN REQUIREMENTS FOR DISCHARGES TO WATERS IMPAIRED FOR NUTRIENTS AND/OR SEDIMENT

MS4 permittees with at least one stormwater discharge to surface waters considered impaired for nutrients (nitrogen and phosphorus) and/or sediment, in which a TMDL has not been developed or the TMDL has not identified a wasteload allocation (WLA) for the permittee, must develop and submit a Pollutant Reduction Plan (PRP) with the application to reduce the pollutant loads to those waters. In the event the permittee also has at least one stormwater discharge to surface waters within the Chesapeake Bay watershed, the PRP may be combined with the CBPRP described in Appendix D.

The PRP is approved upon DEP's issuance of this permit, subject to any conditions identified elsewhere in this permit or in permit correspondence. The permittee shall implement its approved PRP and comply with the following:

- A. The permittee shall achieve a sediment load reduction (lbs/year) of 10%, compared to existing loading, by **November 30, 2025**. Pollutant reduction efficiencies for selected BMPs shall be in accordance with the BMP Effectiveness Values document published by DEP (3800-PM-BCW0100m) or Chesapeake Bay Program Office expert panel reports. The permittee shall submit a report demonstrating implementation of the PRP as an attachment to the first Annual MS4 Status Report that is due following the expiration date of this permit.
- B. The BMPs proposed in the PRP for the term of permit coverage shall be implemented in accordance with the schedule in the PRP. In the event the permittee decides to modify the location, type or number of proposed BMPs, modify the storm sewershed map, or modify the schedule by more than 180 days, the permittee shall submit an update to its CBPRP to DEP prior to implementing the changes. The modified PRP may be implemented upon submission to DEP unless DEP issues an objection in writing within 60 days.
- C. Where submission of a modified PRP to DEP is required, the permittee shall solicit public involvement and participation, as follows:
 1. The permittee shall make a complete copy of the PRP available for public review.
 2. The permittee shall publish, in a newspaper of general circulation in the area, a public notice containing a statement describing the plan, where it may be reviewed by the public, and the length of time the permittee will provide for the receipt of comments. The public notice must be published at least 45 days prior to the deadline for submission of the PRP to DEP.
 3. The permittee shall accept written comments for a minimum of 30 days from the date of public notice.
 4. The permittee shall accept comments from any interested member of the public at a public meeting or hearing, which may include a regularly scheduled meeting of the governing body of the municipality or municipal authority that is the permittee.
 5. The permittee shall consider and make a record of the consideration of each timely comment received from the public during the public comment period concerning the plan, identifying any changes made to the plan in response to the comment.

Modified PRPs submitted to DEP must include a copy of the newspaper notice, a copy of all written comments received from the public and a copy of the permittee's record of consideration of all timely comments received in the public comment period.

- D. Progress with achieving the required pollutant load reductions shall be reported in each Annual MS4 Status Report.



MS4 OUTFALL FIELD SCREENING REPORT

BACKGROUND INFORMATION

Permittee Name: City of Williamsport Joint Client	NPDES Permit No.: PAI134813
Date of Inspection:	Outfall ID No.:
Land Uses in Outfall Drainage Area (Select All):	Latitude: _____ ° _____ ' _____ "
☐ Industrial ☐ Urban Residential	Longitude: _____ ° _____ ' _____ "
☐ Commercial ☐ Suburban Residential	Dry Weather Inspection? ☐ Yes ☐ No
☐ Open Space ☐ Other:	Date of Previous Precipitation:
	Amount of Previous Precipitation: _____ in
Inspector Name(s):	Were Photographs Taken? ☐ Yes ☐ No
	Are Photographs Attached? ☐ Yes ☐ No

OUTFALL DESCRIPTION

TYPE	MATERIAL	SHAPE	DIMENSIONS	SUBMERGED
☐ Closed Pipe	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other	☐ Circular ☐ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other ☐ Other	Diameter: _____ in	☐ In Water ☐ With Sediment
☐ Open Channel	☐ Concrete ☐ Earthen ☐ Rip-Rap ☐ Other	☐ Trapezoid ☐ Parabolic ☐ Other	Depth: _____ in Top Width: _____ in Bottom Width: _____	

Dry Weather Flow Present at Outfall During Inspection? ☐ Yes ☐ No (If No, skip to Certification Section)

Description of Flow Rate: ☐ Trickle ☐ Moderate ☐ Significant ☐ N/A

DRY WEATHER FLOW EVALUATION

Does the dry weather flow contain color? ☐ Yes ☐ No If Yes, provide a description below.

Does the dry weather flow contain an odor? ☐ Yes ☐ No If Yes, provide a description below.

Is there an observed change in the receiving waters as a result of the discharge? ☐ Yes ☐ No
If Yes, provide a description below.

Does the dry weather flow contain floating solids, scum, sheen or substances that result in deposits? ☐ Yes ☐ No
If Yes, provide a description below.

Were sample(s) collected of the dry weather flow? ☐ Yes ☐ No (If Yes, No. Samples: _____)					
FIELD / LABORATORY ANALYSIS					
PARAMETER	RESULTS	UNITS	PARAMETER	RESULTS	UNITS
Flow Rate		GPM	Fecal Coliform		No./100 mL
pH		S.U.	COD		mg/L
Total Residual Chlorine (TRC)		mg/L	BOD5		mg/L
Conductivity		µmhos/cm	TSS		mg/L
Ammonia-Nitrogen		mg/L	TDS		mg/L
Other: _____			Oil and Grease		mg/L
Other: _____			Other: _____		
Indicate the parameters above that were analyzed by a DEP-certified laboratory:					
ILLICIT DISCHARGES					
Is the dry weather flow an illicit discharge? ☐ Yes ☐ No					
If Yes, describe efforts made to determine the source(s) of the illicit discharge.					
Describe corrective actions taken by the permittee in response to the finding of an illicit discharge.					
Inspector Comments:					

RESPONSIBLE OFFICIAL CERTIFICATION	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowledge of violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).	
Responsible Official Name	Signature
Telephone No.	Date

Application Type New
Facility Type MS4
Major / Minor Minor

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PAI134813
APS ID 979061
Authorization ID 1248531

Applicant and Facility Information

Applicant Name <u>City of Williamsport and Loyalsock Township Joint Client</u> Applicant Address <u>245 W 4th Street</u> <u>Williamsport, PA 17701-6113</u> Applicant Contact <u>Mark Benner</u> Applicant Phone <u>(570) 220-1872</u> Client ID <u>345947</u> SIC Code <u>9199</u> SIC Description <u>Public Admin. - Genral Government, Nec</u> Date Published in PA Bulletin <u>October 10, 2020</u> Comment Period End Date <u>November 9, 2020</u> Purpose of Application <u>Application for a new NPDES permit for discharge of treated stormwater.</u>	Facility Name <u>MS4 Joint Permit Williamsport City Loyalsock Township Lycoming County</u> Facility Address <u>245 W 4th Street</u> <u>Williamsport, PA 17701-6113</u> Facility Contact <u>Mark Benner</u> Facility Phone <u>(570) 220-1872</u> Site ID <u>832443</u> Municipality <u>Williamsport City</u> County <u>Lycoming</u> EPA Waived? <u>Yes</u> If No, Reason _____
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Internal Review and Recommendations

No comments were received from the public, the operations section, or EPA. The permittee submitted a response to the Department's draft permit / PRP deficiencies along with additional comments in an email dated 11/9/2020. The responses/comments are as follows:

PRP technical deficiency comment responses:

1. **Department Deficiency:** Please provide additional details regarding the regenerative stormwater conveyances (BMP-224 & BMP-238). In specific, provide a more comprehensive eligibility review analysis for each of these projects. (These reviews should be identical to the stream restoration reviews.)

Deficiency Response: WAJMS4s have developed additional support information in reference to BMPs 224 and 228. The documents are provided as Attachment A.

Department Response: The Department has determined that the additional information provided satisfies the deficiency and this BMP will be approved with the PRP.

2. **Department Deficiency:** Regarding the Hidden Valley Basin Retrofit (BMP-239), please provide additional details for this project. In specific, if this structure was constructed under a 102 Permit, please provide documentation that the described capacity issue is not due to a lack of compliance with the PCSMs. (Essentially, this structure should be retrofitted due to a design need and not due to a lack of maintenance.)

Deficiency Response: This structure was not constructed under a 102 Permit to the knowledge of Loyalsock Township. The BMP location was investigated as part of the PRP development process and it was determined that the basin bottom soils and outlet structure is not sufficient at adequately delaying stormwater flows from the contributory area. Loyalsock Township has had preliminary discussions with the site owner to make necessary retrofits to increase stormwater control at this location through enhanced soils, vegetation, a longer outlet discharge path, and retrofit/new outlet control structure.

Approve	Return	Deny	Signatures	Date
X			<i>Jonathan P. Peterman</i> Jonathan P. Peterman / Project Manager	November 24, 2020
X			<i>Nicholas W. Hartranft</i> Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	November 24, 2020
X			<i>Thomas M. Randis</i> Thomas M. Randis / Program Manager	November 25, 2020

Internal Review and Recommendations

Department Response: The Department has determined that the additional information provided satisfies the deficiency and this BMP will be approved with the PRP.

3. **Department Deficiency:** Please ensure that your stream restoration projects (see BMP-237 Miller's Run at Short Park) only account for areas where a permanent 35' minimum riparian buffer can be maintained alongside the stream itself. Update Table 6 of your PRP as necessary.

Deficiency Response: Loyalsock Township has identified the area adjacent to the existing walking/bike path near the softball fields at Short Park as having adequate space to allow for a 35 foot minimum riparian buffer for the approximate length identified in the stream restoration documentation attachment (Appendix E of PRP). Existing site features (parking lot and path) will be evaluated for relocation as part of the stream restoration design to ensure buffer is maintained.

Department Response: The Department has determined that the additional information provided satisfies the deficiency and this BMP will be approved with the PRP.

Draft NPDES MS4 Permit comments:

1. WAJMS4s request clarification of their status as either 'Existing' or 'New' permittees. Status of varies throughout the draft permit (see example in comment 4 below). Many of the MCM requirements vary based on whether existing or new.

Department Response: City of Williamsport and Loyalsock Township Joint Client are considered to be an existing permittee currently covered under NPDES permit PAI134808. Once this proposed permit is issued, the previous permit will be terminated.

2. WAJMS4s request clarification to the following Appendix Requirements:

a. Page 1, Appendix D (Chesapeake Bay) is specifically listed as required. Are Appendix C (Susquehanna River) or Appendix E (Spring Run) required?

b. Pages 21 and 22 – Appendix C, D, and E each mentioned generally, but only Appendix D is required on cover page 1, and only Appendix D requirements are attached. (ie: The cover page is inconsistent with latter pages, including attachments.) Additionally, this is different than what has been included in other permits issued locally (e.g.: South Williamsport).

Department Response: The appendices were listed incorrectly and not attached. The applicable appendices are Appendix C, D, and E. These will be added to the permit documents accordingly.

3. Page 6, Unanticipated Non-compliance or Potential Pollution Reporting – WAJMS4 is requesting clarification regarding what defines a "non-compliance event which may endanger health or the environment:"

a. Would this include all illicit discharges? Is there guidance regarding types of pollution and /or quantity thresholds? (For example: 2 gallons of hydraulic fluid or 10 gallons per minute of potable water).

b. Page 16, BMP#4 contains similar language, please clarify guidelines on reporting.

Department Response: Illicit discharges would be determined and reported using Part C.I.3.d.3 of the permit. Refer to 25 Pa. Code §§ 91.33(a) Incidents causing or threatening pollution for the general definition of this requirement. "25 Pa. Code § 91.33(a) does not provide a threshold amount of a substance that triggers mandatory notification requirements under this section. However, notification should be provided to DEP about any quantity of a substance that spills, discharges, or otherwise enters waters of the Commonwealth if the release may endanger downstream users, may result in pollution, may create a danger of pollution, or may damage property. When there is some question regarding whether a spill or release requires notification of DEP or not, DEP recommends that a Responsible Party err on the side of notification. Notifying DEP of these incidents requires minimal effort (i.e., a phone call) and can help prevent or minimize hazards to the environment, public health, and public safety. The decision to notify DEP may also affect liability because failure to notify DEP can result in a civil penalty, pursuant to the Department's exercise of its enforcement discretion." This is an excerpt from the *Guidance on Notification Requirements for Spills, Discharges, and other Incidents of a Substance Causing or Threatening Pollution to Waters of the Commonwealth Under Pennsylvania's Clean Streams Law* (383-4200-003) which can be located on the Department's eLibrary website.

4. Page 17, BMP#5 – Ordinance implementation date requirement: 2022 Model ordinance instructions (3800-PM-BCW0100h 5/2016) state existing permittees must adopt by September 30, 2022, not 4 years post-issuance. New permittees have until 4 years post issuance. Are WAJMS4s considered existing or new? Other areas of the permit state that WAJMS4s are an existing permittee. WAJMS4s request clarification.

Department Response: These dates are entered in at the time of issuance. The dates will be set to four years after issuance (2024) for an existing permittee.

The abovementioned changes will be applied to the draft permit. The permit will be issued as final.



776 Bull Run Crossing, Suite 200
Lewisburg, PA 17837
570.524.6744
www.hrg-inc.com

VIA EMAIL

November 9, 2020

Mr. Jonathan Peterman
Pennsylvania Department of Environmental Protection
North Central Regional Office
208 West Third Street, Suite 101
Williamsport, Pennsylvania 17701

Re: [PRP Plan Revision/Addendum Comment Response](#)
[Draft NPDES MS4 Permit Comments](#)
[Joint Client Williamsport Area Joint MS4s \(WAJMS4\)](#)
[NPDES Permit No. PAI134813 City of Williamsport, Loyalsock Township, Lycoming County](#)

Dear Mr. Peterman:

On behalf of Loyalsock Township and the City of Williamsport, the Joint Applicants who collaborated on the Joint Pollutant Reduction Plan (PRP) for their respective MS4 Service Areas. The joint permit applicants received the draft NPDES MS4 Permit and PRP comment letter dated October 1, 2020. The draft NPDES MS4 Permit was posted to the Pennsylvania Bulletin for public review on October 10, 2020. We have reviewed DEP's draft NPDES MS4 Permit and PRP comment letter. Our responses to the PRP technical deficiencies are indicated below in bold type. Comments on the draft NPDES MS4 Permit follow the PRP comment responses.

PRP technical deficiency comment responses:

1. Please provide additional details regarding the regenerative stormwater conveyances (BMP-224 & BMP-238). In specific, provide a more comprehensive eligibility review analysis for each of these projects. (These reviews should be identical to the stream restoration reviews.)

WAJMS4s have developed additional support information in reference to BMPs 224 and 228. The documents are provided as Attachment A.

2. Regarding the Hidden Valley Basin Retrofit (BMP-239), please provide additional details for this project. In specific, if this structure was constructed under a 102 Permit, please provide documentation that the described capacity issue is not due to a lack of compliance with the PCSMs. (Essentially, this structure should be retrofitted due to a design need and not due to a lack of maintenance.)

This structure was not constructed under a 102 Permit to the knowledge of Loyalsock Township. The BMP location was investigated as part of the PRP development process and it was determined that the basin bottom soils and outlet structure is not sufficient at adequately delaying stormwater flows from the contributory area. Loyalsock Township has had preliminary discussions with the site owner to make necessary retrofits to increase stormwater control at this location through enhanced soils, vegetation, a longer outlet discharge path, and retrofit/new outlet control structure.

3. Please ensure that your stream restoration projects (see BMP-237 Miller's Run at Short Park) only account for areas where a permanent 35' minimum riparian buffer can be maintained alongside the stream itself. Update Table 6 of your PRP as necessary.

Loyalsock Township has identified the area adjacent to the existing walking/bike path near the softball fields at Short Park as having adequate space to allow for a 35 foot minimum riparian buffer for the approximate length identified in the stream restoration documentation attachment (Appendix E of PRP). Existing site features (parking lot and path) will be evaluated for relocation as part of the stream restoration design to ensure buffer is maintained.

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If you have any questions please do not hesitate to contact us.

Sincerely,

Herbert, Rowland & Grubic, Inc.



Matthew J. Vanaskie, P.E.
Project Manager

MJV/mjv
R003405.0431

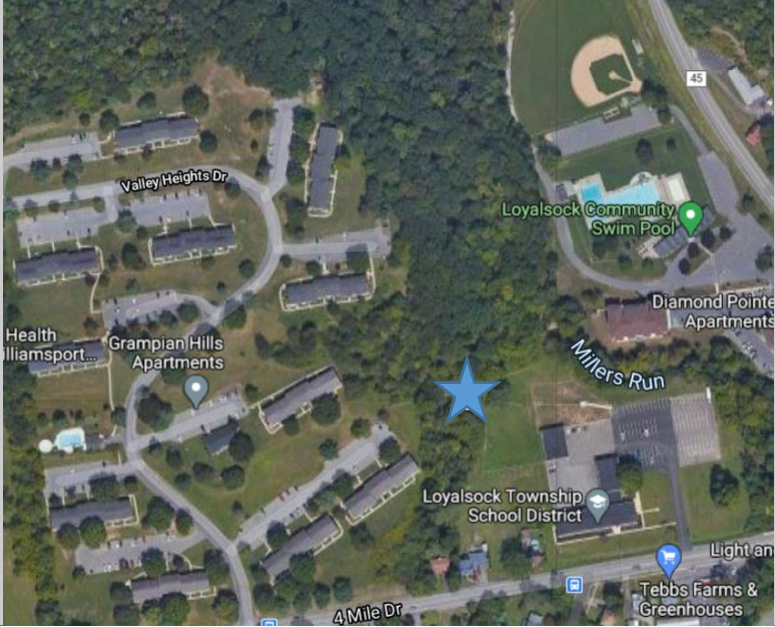
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c: Bill Burdett, Loyalsock Township
Jon Sander, City of Williamsport
Michael Miller, Wendy Walter, and Marcia LeBeau, Williamsport Sanitary Authority
Erin Letavic, HRG

ATTACHMENT A

Project Eligibility Review Form

General Project Information

Date:	11/9/2020
County:	Lycoming
Municipality:	Loyalsock Township
Street Address:	Rear of 1670 4 Mile Dr., Williamsport, PA 17701
Google Map Location Screenshot:	
Regenerative Stormwater Conveyance Length:	300 LF
Both Sides of Stream:	Yes ☒ No ☐
PRP Approval Date:	TBD
PRP BMP ID:	BMP-224.3
PRP BMP Name:	Valley Heights to Community Center Regenerative Stormwater Conveyance

PRELIMINARY TECHNIQUES

Streambed Stability:	Cross weirs (rock) ☒ Cross weirs (wood) ☒ Grade control structure ☒ Pool/riffle system rehabilitation ☒
Streambank Stability:	Cuttings, live stakes ☒ Fascines/wattles ☒ Tree revetment ☒ Embankment reshaping ☒

Eligibility Review

SITING Existing channel/ streambank erosion pics:



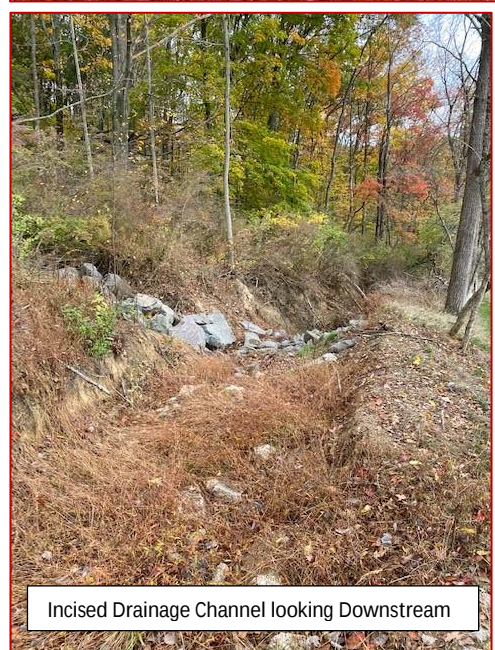
Incised Drainage Channel looking Upstream



Incised Drainage Channel looking Downstream



Incised Drainage Channel looking Upstream



Incised Drainage Channel looking Downstream

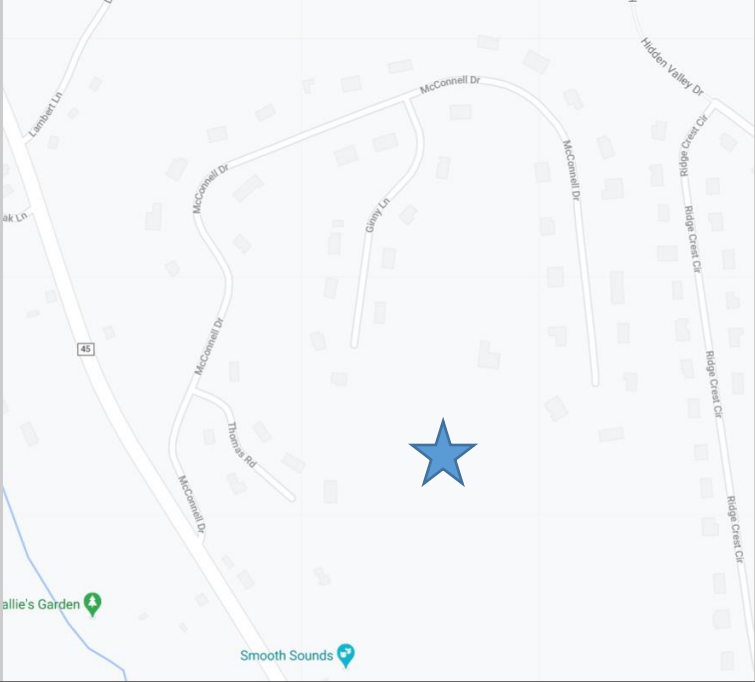
Both Sides of Channel to Realize Restoration Improvement:

Yes ☒ No ☐

Steep slopes and upstream development runoff have deeply incised channels in the rear of Community Center/downhill from Valley Heights apartments. Stepped pool sequences and log and rock vanes will be used to slow flows and allow for infiltration and vegetation establishment to prevent/limit erosion.

Project Eligibility Review Form

General Project Information

Date:	11/9/2020
County:	Lycoming
Municipality:	Loyalsock Township
Street Address:	Rear of 1770 McConnell Dr, Williamsport, PA 17701
Google Map Location Screenshot:	
Regenerative Stormwater Conveyance Length:	400 LF
Both Sides of Stream:	Yes ☒ No ☐
PRP Approval Date:	TBD
PRP BMP ID:	BMP-238
PRP BMP Name:	Cameo Estates to Northway Regenerative Stormwater Conveyance

PRELIMINARY TECHNIQUES

Streambed Stability:	Cross weirs (rock) ☒ Cross weirs (wood) ☒ Grade control structure ☒ Pool/riffle system rehabilitation ☒
Streambank Stability:	Cuttings, live stakes ☒ Fascines/wattles ☒ Tree revetment ☒ Embankment reshaping ☒

Eligibility Review

SITING Existing channel/ streambank erosion pics:



Incised Drainage Channel looking Upstream



Incised Drainage Channel looking Downstream



Incised Drainage Channel looking Downstream



Incised Drainage Channel looking Downstream

Both Sides of
Channel to
Realize
Restoration
Improvement:

Yes ☒ No ☐

Steep slopes and upstream development runoff have deeply incised channels in the rear of properties. Stepped pool sequences and log and rock vanes will be used to slow flows and allow for infiltration and vegetation establishment to prevent/limit erosion.