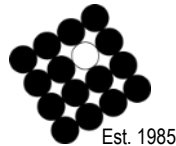


# Municipal MS4s

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Complying with Current Permit Requirements  
and Preparing for Permit Changes



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Lennon, Smith, Souleret  
Engineering, Inc.

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Civil Engineers and Surveyors

# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

## ● Agenda:

- New Permit Schedule
- 2018 MS4 Tasks
  - MCMs/Typical Annual Tasks
  - Annual Report
  - Stormwater Ordinance Update
- PRP Implementation
- Stormwater Utility Fee



# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

## ● Permit Schedule Update

- Renewal application (Notice of Intent) was submitted to PADEP in September 2017 and is currently under review.
- DEP intends to issue new permit by March 15, 2018 for upcoming permit cycle.
- New permit will expire in March 2023, with renewal applications due March 2022.



# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

## ● 2018 MS4 Tasks

- Update and Implement Stormwater Management Program (Written Plan) addressing each MCM:
  - MCM #1 - Public Education and Outreach on Stormwater Impacts
  - MCM #2 - Public Involvement/Participation
  - MCM #3 - Illicit Discharge Detection and Elimination
  - MCM #4 - Construction Site Stormwater Runoff Control
  - MCM #5 - Post-Construction Stormwater Management (PCSM) in New and Re-Development Activities
  - MCM #6 - Pollution Prevention/Good Housekeeping
- Continue documentation of all compliance activities



# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

## ● 2018 MS4 Tasks

- Complete and submit your Annual/Progress Report. Reporting changes since the last permit cycle include:
  - Reporting is due every year. The previous permit required reporting every two years.
  - Reports are due September 30 of each year for all permittees.
  - A \$500 fee is due with each Report. No fee was previously collected.
- Stormwater Management Ordinance Update:
  - Ordinance to meet criteria of 2018 MS4 NPDES Permit
  - Ordinance to meet criteria of County Act 167 Plan Ordinance (if applicable)
  - Ordinance to address aspects of PRPs and TMDL Plans



# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **Pollutant Reduction Plans (PRPs) were developed in 2017 and submitted to PADEP to meet the following requirements:**
  - All permittees that discharge to waters impaired for the following pollutants require PRPs:
    - Nutrients (Nitrogen and Phosphorus)
    - Sediment
  - The following reductions must be achieved within 5 years of permit issuance (March 2023 for General Permits):
    - Achieve 10% reduction in pollutant loading of sediment
    - Achieve 5% reduction in pollutant loading of total phosphorus
- **Upon permit issuance anticipated in March 2018, each Permittee will have 5 year to implement the PRP and construct the BMPs identified to achieve pollutant reductions**



# MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **BMPs identified in the PRP/TMDL Plan must be constructed and the required pollutant reduction achieved within 5 years of permit issuance (March 2023 for GPs)**
- **Municipal budget for each year must include funds for:**
  - Final Design of BMPs – PRP will provide only planning level design
  - Acquisition of property, if needed for BMP construction
  - Construction costs for installation of new BMPs or retrofit of existing BMPs, including bidding costs if constructed by a contractor
  - Annual maintenance of all BMPs
- **Each year's annual report will include documentation and supporting calculations for reductions achieved through implementation of the PRP/TMDL Plan.**





# STORMWATER MANAGEMENT UTILITY USER FEE

- **Authority to implement a fee:**

- In 2016 Pennsylvania Legislature authorized Second Class Townships to assess reasonable and uniform fees for storm water management activities and facilities without the need to establish a municipal authority.

- **Why Consider a fee:**

- Funds for managing the storm water system have typically come from the Township's General Fund of the operating budget
- Establishment of a user fee creates an equitable distribution of cost based on impact to the Township MS4 and stormwater management system. This includes all parcel, including those that are tax-exempt.
- Increase regulatory have resulted in more significant expenditure for compliance with state and federal stormwater requirements.





# STORMWATER MANAGEMENT UTILITY USER FEE

- **How is the fee assessed:**

- Fees must be equitable and are therefore determined based on a property's anticipated contribution of stormwater runoff. This is most proportionately determined by evaluating the amount of impervious surface on the property.
- An Equivalent Residential Unit (ERU) is determined through statistical analysis of Township properties to determine the amount of impervious area of a typical single family residential property within the Township.
- Each Single Family Residential Property is assessed the fees at the rate of 1 ERU.



# STORMWATER MANAGEMENT UTILITY USER FEE

## ● How is the fee assessed:

- Non-Single Family Residential Properties include all other types of properties (commercial, offices, schools, apartments, churches, etc.) and are assessed a fee based on the actual impervious area at each site.
- Impervious area is determined through aerial photography with the fee assess in increments of 1 ERU. For example, if 1 ERU is determined to consist 3,000 square feet, an office building with 30,000 square feet of impervious area would be assessed a fee of 10 ERUs.
- Properties with operational and maintained stormwater BMPs are eligible for a credit, or reduction of fee.



# STORMWATER MANAGEMENT UTILITY USER FEE

## ● What can the fee be used to fund:

- Administrative Expenses associated with Stormwater Management
- Annual Operation and Maintenance of the MS4
  - Public Works/Road Department labor, materials and equipment
  - Contracted services for maintenance, such as inlet cleaning or replacement, storm sewer cleaning, etc.
- Capital Improvements
  - Projects to replace failing infrastructure
  - Project to improve or address stormwater management issues
- MS4 Compliance
  - Stormwater Management Program (MCM Written Plan) Implementation
  - PRP Implementation – Construction and Maintenance of BMPs



# CONTACTS

**Kevin A Brett, P.E.**  
**Lennon, Smith, Souleret Engineering, Inc.**  
**[kbrett@lsse.com](mailto:kbrett@lsse.com)**

**Shawn R. Wingrove, E.I.T.**  
**Lennon, Smith, Souleret Engineering, Inc.**  
**[swingrove@lsse.com](mailto:swingrove@lsse.com)**

