

Brighton Township Board of Supervisors

Annual MS4 Update

FEBRUARY 12, 2024



MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **Agenda:**

- Permit Overview
- Annual MS4 Tasks
 - Stormwater Management Program (Minimum Control Measures)
 - Pollutant Control Measures
- PADEP Compliance Evaluation
 - Annual Report
 - DEP Inspection
 - Current cycle of inspections for 2018 Permit is underway
- Pollutant Reduction Plans
- Permit Renewal

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Permit Overview – NPDES Permit for Stormwater Discharges from Small MS4s

- Municipal Separate Storm Sewer System (MS4) - Permit applies to stormwater infrastructure that is:
 - Used for collecting and/or conveying stormwater
 - Owned by a municipality or any other public body
 - Not used as a combined sewer
 - Not part of Publicly Owned Treatment Works (i.e. sewage treatment plant)
- NPDES MS4 Permit authorizes discharge of stormwater from the MS4 to Waters of the Commonwealth
- NPDES MS4 Permit issued by PADEP in Pennsylvania. The program is administered nationally by EPA.
- Primary goal of the permit: Protecting water quality and limiting stormwater pollution

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Annual 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
- The Stormwater Management Program must:
 - Reduce the discharge of pollutants from the MS4 to the maximum extent practicable,
 - Protect water quality, and
 - Satisfy appropriate water quality requirements of the Clean Water Act and the Pennsylvania Clean Streams Law

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Annual Reports

- Due September 30 of each year
- Self reporting on progress made for each MCM, along with PRP and PCM progress
- \$500 renewal fee due annually

● DEP or EPA Inspections

- DEP Inspects each permittee at least once every 5 years
- Inspections for 2018 Permit are underway (completed in 2021)
 - Office Review - Thorough review of written plans and documentation of compliance with required Minimum Control Measures. Documentation of all MS4 related activities (event flyers, distributed materials, work logs, complaint resolution tracking, outfall screening etc.)
 - Field Review – Evaluation of municipal facilities including Public Works yard, garage, salt storage and other facilities. Field review of BMPs and outfalls

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **Pollutant Reduction Plans (PRPs) were developed in 2017 and submitted to PADEP to meet the following requirements:**
 - 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
- **Each Annual Report will include documentation and supporting calculations for reductions achieved through implementation of the Pollutant Reduction Plan.**
- **PRPs approved by PADEP established:**
 - Total pollutant loading required to be addressed in permit term
 - Potential BMPs to be constructed to achieve required pollutant reduction goals.

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **BMPs identified in the Pollutant Reduction Plan must be constructed and the required pollutant reduction achieved by March 2023**
- **Municipal budget for each year must include funds for:**
 - Final Design of BMPs
 - Acquisition of property, as 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
- **Stormwater Fee was implemented for costs associated with Implementation of PRP**

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **Structural BMPs – Extended Detention/Infiltration/Filtration Basin – New Construction or Retrofit of existing facilities**
 - Typically require significant surface area and volume to capture quantity of runoff need to treat high pollutant loading
 - Right-of-way or easements may be required for new construction
 - Long term annual maintenance needed on all BMPs
 - Additional flood control benefits; improved rate control from stormwater facilities
 - Controlling the discharge rate reduces downstream erosion from facilities
 - Outlet structures allow water to be detained for certain time to allow for infiltration and sediment to settle out and not be discharged into streams
 - Facilities equipped with underdrains for emergency purposes

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

- **Structural BMPs – Extended Detention/Infiltration/Filtration Basin – New Construction or Retrofit of existing facilities**
 - Brighton Fields
 - Construction completed in 2020
 - Beaver Woods
 - Construction completed in 2023
 - Crandon Circle (Two Mile)
 - Design is ongoing and Permit Applications are being prepared
 - Anticipate Late 2024 Construction

MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)

● Permit Renewal

- Current Permit expires March 2025
 - DEP issued Notice - General Permits extended 2 years (previously set to expire March 2023)
 - Township to continue with annual tasks in this 2 years (Outfall Testing, BMP Reviews, Training, etc.)
 - Notice of Intent not required as long as Annual Progress Report is submitted each September unless otherwise directed by DEP
 - Coverage under current Permit will renew unless otherwise notified by DEP
 - Based on recent discussions/presentation from PADEP, it is anticipated the 2025 Permit guidelines will be issued in the Spring of 2024
 - DEP will offer trainings/presentations regarding the new permit regulations

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