

**BOROUGH OF SEWICKLEY  
RESOLUTION NO. 2016-020**

**WHEREAS**, the Council of the Borough of Sewickley finds that it is in the best interest of the Borough to adopt the revised Stormwater Management Program and Minimum Control Measure Plan, a copy of which is attached, hereto as Exhibit "A";

**NOW THEREFORE**, it is hereby resolved by the Council of the Borough of Sewickley that the proper Borough officers are authorized and directed to take all actions that may be needed to implement said revised Stormwater Management Program and Minimum Control Measure Plan.

**THIS RESOLUTION ADOPTED** by the Council of the Borough of Sewickley at a duly assembled meeting held on the 15<sup>th</sup> of August, 2016.

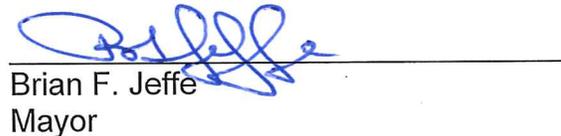
**ATTEST:**

  
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Kevin M. Flannery  
Borough Manager/Secretary

**BOROUGH OF SEWICKLEY:**

  
\_\_\_\_\_  
Susan H. Aleshire  
President of Council

**EXAMINED** and **APPROVED** on this 15<sup>th</sup> of August, 2016.

  
\_\_\_\_\_  
Brian F. Jeffe  
Mayor

**MUNICIPAL SEPARATE STORM SEWER  
SYSTEM (MS4)**

**STORMWATER MANAGEMENT PROGRAM**

**AND**

**MINIMUM CONTROL MEASURE PLAN**

**BOROUGH OF SEWICKLEY,  
ALLEGHENY COUNTY, PENNSYLVANIA**

Adopted by Resolution at a Public Meeting Held on  
August 15, 2016

# **STORMWATER MANAGEMENT PROGRAM**

## **Introduction**

The Borough of Sewickley, located in Allegheny County, Pennsylvania, governed by the Borough Mayor and a nine-member Borough Council. Borough operations are administered by Borough staff under the direction of the Borough Manager.

The Borough comprises an area of 1.10 square miles in western Allegheny County and shares municipal borders with the Boroughs of Edgeworth, Glen Osborne, and Sewickley Heights, and the Township of Aleppo. Additionally, the Borough shares a border along the Ohio River with Moon Township. Based on the 2010 Decennial Census completed by the U.S. Census Bureau, the entirety of the Borough is located within the Urbanized Area. The 2010 Census also identifies a total Borough population of 3,827. The Borough is a nearly entirely developed community containing primarily residential development with commercial village district comprising several blocks of the Borough's main thoroughfares, Beaver Street and Broad Street.

## **Municipal Separate Storm Sewer System**

The Borough owns and operates a regulated small municipal separate storm sewer system (MS4). As the MS4 is located within an Urbanized Area, the Borough has obtained coverage under a National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges for Small MS4s (PAG-13). The Borough has been issued Permit No. PAG136165 by the Pennsylvania Department of Environmental Protection (PADEP) authorizing discharges from the Borough regulated MS4 to surface waters of the Commonwealth.

Surface waters that receive discharge from the Borough MS4 are summarized in the following table along with their identified impairments:

<b>Stream</b>	<b>Impairments</b>
Ohio River	Pathogens PCB
Unnamed Tributaries to Ohio River	Siltation

## **Plan Implementation and Goals**

The Borough's primary goal of enacting and implementing this Stormwater Management Plan (SWMP) is to improve water quality in surface waters of the Commonwealth by reducing the contribution of pollutants from discharges from the Borough's MS4. Enactment of the SWMP will consist of implementing Best Management Practices (BMPs) aimed at improving water quality, as detailed as part of the following plans for compliance with each Minimum Control Measure (MCM), as follows. The effectiveness of the SWMP is evaluated on an annual basis. As detailed as part of the written plan for each MCM, documentation of the results of each BMP are maintained throughout each permit year. BMPs to address each MCM will be revised, improved or enhanced as needed based on the annual implementation results.

## MCM #1 - PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS

*Federal regulations require municipalities to develop a program that meets the following:*

- *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 (40 CFR Part 122.34 (b)1(i)).*

### MCM #1 BEST MANAGEMENT PRACTICES (BMPs)

*Best Management Practices must be utilized to meet Minimum Control Measure No. 1. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

1. *Develop, implement and maintain a written Public Education and Outreach Program.*
2. *Develop and maintain lists of target audience that are present within the areas served by the regulated small MS4.*
3. *Annually publish at least one issue of a newsletter, pamphlet, a flyer or a website that includes general information, a general description of Borough's Stormwater Management Program and/or information about municipality's stormwater management activities.*
4. *Distribute stormwater educational materials and/or information to the target audiences using a variety of distribution methods (minimum two methods).*

#### BMP #1 - Develop, implement and maintain a written Public Education and Outreach Program

**Measurable goal: Implement, evaluate and revise the Public Education and Outreach Program (PEOP) each permit year as necessary.**

#### PEOP Plan

The Borough maintains this written Public Education and Outreach Program (PEOP) plan that establishes the goals, techniques, roles and responsibilities for the implementation of procedures and policies for compliance with the

requirements of each BMP for this MCM. The PEOP is comprised of each of the following sections included under MCM #1 is detailed as part of each BMP for MCM #1, as noted below.

#### PEOP Plan Review

This PEOP plan is reviewed periodically, at a minimum of once annually. The review of the written plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #1 compliance binders. The review log details the dates, scope, reviewing parties and revisions made as a part of each review.

BMP #2 - Develop and maintain lists of target audience groups that are present within the areas served by regulated small MS4s. Target audiences shall include residents, businesses (including commercial, industrial and retailers), developers, schools, and municipal employees.

**Measurable goal: Annually review and update the Target Audience List.**

#### Target Audience List

A Target Audience List is maintained by the Borough and included as part of its MCM #1 compliance documentation binder. The list contains an inventory of specific groups within the Borough that may receive distributed educational material, including specific contact information for each group and a listing of educational materials that are appropriate for the group. The list is maintained, reviewed and revised as needed by the Borough Manager. Reviews of the list are completed periodically, at a minimum interval of once per year.

BMP #3 – Annually publish at least one issue of a newsletter, pamphlet, a flyer or a website that includes general information, a general description of the Borough'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., PA DEP and US EPA

stormwater websites, and any other sources that will be helpful to readers).  
Implement at least one of the following alternatives:

- a. *The municipality will publish and distribute in printed form a pamphlet containing information consistent with this BMP to the property owners within the community.*
- b. *Published educational and informational items including links to DEP's and EPA's stormwater websites on the website.*

**Measurable goal: Annually distribute stormwater educational information that addresses one or more of the six MCMs through the Borough newsletter and website. Review, update and maintain the published educational content annually.**

#### MS4 Pamphlet/Newsletter

The Borough annually publishes a pamphlet containing educational material relevant to Borough residents with regard to water quality, stormwater management and/or the Borough's MS4 program. The pamphlet is distributed to all residents of the Borough via US Mail. Copies of the pamphlet are also available at the Borough Office and electronically on the Borough website. The Borough Manager reviews and provides MS4 content for each pamphlet. Once published, a copy of the MS4 content included in the pamphlet is kept with the Borough's MCM #1 compliance documentation binder. Additionally, issuance of educational material in the pamphlet is tracked in the Borough's MCM #1 Public Education Log.

#### Website

The Borough website, <http://www.sewickleyborough.org>, contains educational material with regard to stormwater management, stormwater quality and the Borough's MS4 program. The Borough Manager reviews and provides MS4 content for website. Website content includes a description of the Borough MS4 program and educational stormwater material. The website also provides links to stormwater/MS4 information and resources published by other agencies, including the Pennsylvania Department of Environmental Protection, the Environmental Protection Agency, Southwestern Pennsylvania Commission, and 3 Rivers Wet Weather. The website contains electronic copies of the Borough Stormwater Management Ordinance and Prohibited Discharge Ordinance and Illicit Discharge Complaint forms. The content of the Borough website is reviewed, evaluated and updated at least annually at the direction of the Borough Manager. Once published, a copy of the MS4 content included on the website is

kept with the Borough's MCM #1 compliance documentation binder. Additionally, issuance of educational material on the website is tracked in the Borough's MCM #1 Public Education Log.

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, posters, presentations, conferences, meetings, fact sheets, giveaways, storm drain stenciling.

**Measurable goal: Select and utilize at least two distribution methods in each permit year. These are in addition to the newsletter and website provisions of BMPs #3 and #4.**

#### Distribution of Educational Material

The Borough distributes educational material to Target Audience Groups throughout each permit year. Educational material is tailored to the intended audience. For example, the Borough may distribute information regarding the effects of grease in the storm drains to restaurant owners, distribute information regarding the effects of pet waste at pet supply store and veterinarian offices or distribute post construction BMP information to developers. Educational material is developed, reviewed, evaluated and distributed by the Borough Manager. As part of this PEOP, the Borough distributes educational material through a minimum of two distribution methods during each permit year. Documentation of distribution of materials is maintained in the Borough's MCM #1 compliance documentation binder. Additionally, distributed educational materials are logged in the Borough's MCM #1 Public Education Log by the Borough Manager. The Public Education Log tracks information regarding each distribution of educational material including the content of the distribution, the date of distribution, method of distribution, the person or group distributing information and the recipient (Target Audience) of the distributed materials. Distribution methods implemented by the Borough are as detailed in the following paragraphs. The distribution methods identified are utilized by the Borough on a periodic, rotating basis. Except where noted, each method is not necessarily utilized in each permit year. Distribution methods are selected throughout each permit year to best reach the intended target audiences.

#### Public Meetings

Borough Council meetings are held on the third Monday of each month. Meetings are open to the public, with meeting dates advertised annually in the Borough paper of record and presented on the Borough website. Regular monthly meetings include an agenda item under the Borough Manager's Report specific to discussion regarding the Borough MS4 program. Additionally, an annual MS4 presentation is provided by the Borough Engineer during a Borough Council Meeting. This presentation is advertised during a preceding meeting, with notification placed on the Borough website and posted at the Borough Office to inform residents of the presentation.

#### Catch Basin Drain Markers

Drain markers have been installed on inlets throughout the Borough to identify that no waste or non-stormwater discharges may be directed to the inlet. New markers are installed annually as part of the Borough Roadway Improvement Program. Markers are reviewed and maintained by the Borough Department of Public Works, and replaced as needed.

#### Pamphlets, Booklets and Flyers at Borough Office

Educational material in the form of pamphlets, booklets and/or flyers is available in the lobby of the Borough Office for distribution to visitors. Materials are replenished as needed. The content of the available material is reviewed annually by the Borough Manager. Copies of materials available for viewing and/or pickup at the office are documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by Borough Manager as materials are placed, replenished, and updated.

#### Bulletin Board Postings

Educational material in the form of flyers are posted at the bulletin boards located at the Borough Office and parks. Educational material is posted by the Borough Manager or Public Works Department. The content of the posted material is reviewed annually by the Borough Manager. Copies of posted materials available for viewing on the bulletin boards are documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by the Borough Manager, as materials are placed, reviewed, and updated.

### Building Permit

Educational material in the form of pamphlets and fact sheets is included with building permit application packets provided to contractors, property owners or developers seeking issuance of building or grading permits from the Borough. Educational material is provided by the Code Enforcement Officer and contains information regarding compliance with the requirements of MCM #4, Construction Site Runoff Control. The content of building permit packet material is reviewed annually by the Borough Manager and Code Enforcement Officer. Copies of materials included in building permit applications are documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by the Code Enforcement Officer, as materials are distributed, reviewed, and updated.

### Dog Waste Disposal Stations

The Borough has installed and maintains Mutt-Mitt Stations (dog waste stations) throughout the Borough as education to residents regarding proper procedures for waste disposal. Signage at the station details disposal procedures and the stations provide bags for waste pickup and a receptacle for resident's use when walking their pets. Waste receptacles are maintained and emptied by Borough Public Works.

### Harvest Festival – MS4 Booth

At its annual Harvest Festival, the Borough sets up and maintains a booth dedicated to distribution of educational material related to the MS4 Program. The booth provides a location for distribution of printed materials, such as pamphlets or flyers, along with video presentations. The content of the provided material is reviewed by the Borough Manager. Copies of materials available for viewing and/or pickup at the booth are documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by Borough Manager.

### Video

The Borough periodically publishes informational videos to educate residents on municipal related subjects, including the stormwater, MS4 and water quality. Videos are available on the Borough website and shown in the lobby of the Borough Offices. The content and production of the videos is directed and reviewed by the Borough Manager. Publication of videos is documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by Borough Manager.

### Door Hangers

Borough Code Enforcement Officer and Public Works Foreman distribute door hangers to Borough residents in areas of suspected or identified illicit discharges. Door hangers are used when illicit discharges are observed by Borough Staff, reported by residents or discovered during annual outfall screening. Distribution of door hangers is documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by Code Enforcement or Borough Manager, when distributed.

## **MCM #2- PUBLIC INVOLVEMENT / PARTICIPATION**

*Federal regulations require municipalities to develop a program that meets the following:*

- *Comply with applicable state and local public notice requirements when implementing a public involvement/participation program (40 CFR Part 122.34 (b)2(i)).*

### **MCM #2 BEST MANAGEMENT PRACTICES (BMPs)**

*Best Management Practices must be utilized to meet Minimum Control Measure No. 2. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

- 1. Develop, implement and maintain a written Public Involvement and Participation Program.*
- 2. Prior to adoption of any ordinance required by the General Permit, provide adequate public notice and opportunities for public review, input, and feedback.*
- 3. Regularly solicit public involvement and participation from the target audience groups.*

*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.*

**Measurable goal: Implement, evaluate and revise the Public Involvement and Participation Program (PIPP) each permit year as necessary.**

#### **PIPP Plan**

The Borough maintains this written Public Involvement and Participation Program (PIPP) plan that establishes the goals, techniques, roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of each BMP for this MCM. The PIPP is comprised of

each of the following sections included under and MCM #2 is detailed as part of each BMP for MCM #1, as noted below.

### PIPP Plan Review

This PIPP plan is reviewed periodically, at a minimum interval of once per year. The review of the written plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #1 compliance binders. The review log details the dates, scope, reviewing parties and revisions made as a part of each review.

### PIPP Goals

As part of the PIPP plan, the Borough implements procedures, activities, techniques and policies to meet the goals of the this MCM which include providing opportunities for the public to participate in the decision making process associated with the Borough's MS4 program, communicating with groups within the community regarding the MS4 program and making periodic reports of progress regarding the MS4 program available to the public. Each of the following BMPs implemented as part of MCM #2 are aimed to address these goals. Additional information regarding each BMP is provided in the ensuing sections.

Opportunities for the public to provide input on the Borough's MS4 program are provided primarily at Borough Council meetings. As detailed in BMP #3, below, an MS4 agenda item is included at regular Borough Council meetings. Public comments are accepted for each agenda item, including the MS4 report. Public input is also accepted by Borough Staff during the Borough's daily hours of office operation. Contact information of the Borough Staff is made available for residents to ask questions, report concerns or provide suggestions. When received, calls, emails, letters or in person visits regarding the MS4 program are forwarded to the Borough Manager. A log is maintained by the Borough Manager documenting the receipt of any public input, and documenting information regarding the name of the individual providing input, the nature of the comment or concern and Borough action taken as a result.

Additionally, as detailed in BMP #2, below, public input is solicited prior to adoption of any new stormwater management ordinance.

Communication with groups within the community is generally provided as part of compliance with MCM #1. Distribution of educational material to

communicate information regarding the Borough's MS4 program, stormwater management and water quality is detailed as part of the PEOP plan. Further communication with groups within the community is conducted during public meeting and public involvement activities as detailed below.

Periodic updates for the public on the Borough's MS4 program are provided primarily through the MS4 report given as part of the MS4 report at the Borough Council monthly meeting. This report details progress made with regard to the MS4 program over the last month and identifies upcoming items of note for the next month.

The Borough's Progress Reports, as submitted to PADEP, are also available on file at the Borough Office for review upon request.

*BMP #2 – Prior to adoption of any ordinance required by the General Permit, provide adequate public notice and opportunities for public review, input, and feedback.*

**Measurable goal: Advertise any proposed MS4 Stormwater Management Ordinance, provide opportunities for public comment, evaluate any public input and feedback, and document the comments received and the Borough's response.**

#### Advertisement of Ordinance Adoption

Prior to the adoption and enactment of any MS4 Stormwater Management Ordinance by the Borough Council, the Ordinance proposed for adoption is advertised in the Borough newspaper of record. The advertisement is prepared and provided to the newspaper by the Borough Manager. Upon receipt, the Borough Manager files proof of publication of the ad in the Borough's MCM #2 compliance documentation binder.

#### Opportunity to Comment

After the advertisement appears in the paper of record, a copy of the proposed Ordinance is made available for review and comment by the public at the Borough Office. Comments received with regard to the Ordinance are logged by the Borough Manager and made available to parties responsible for the content of the Ordinance, including Borough Staff, the Borough Solicitor, the Borough Engineer and the Borough Council. Borough action with regard to each comment received is documented in the comment log. In addition, a public hearing is held by the Borough Council prior to adoption of any MS4 Stormwater Ordinance.

Comments received during the public hearing are documented in the meeting minutes and taken into consideration of the Borough Council prior to action of adoption of any Ordinance.

BMP #3 - Regularly solicit public involvement and participation from the target audience groups. This should include an effort to solicit public reporting of suspected illicit discharges. Assist the public in their efforts to help implement the Stormwater Management Plan. Conduct public meetings to discuss the on-going implementation of Sewickley Borough's Stormwater Management Plan.

**Measurable goal: Conduct at least one public meeting per year to solicit public involvement and participation from target audience groups. Provide reasonable notice of meetings to the public through the usual outlets a reasonable period in advance of each meeting. During the meetings, present a summary of the Borough's progress, activities, and accomplishments with implementation of the Borough's Stormwater Management Plan, and provide opportunities for the public to provide feedback and input.**

#### Public Meetings – Regular Borough Council Meetings

Borough Council meetings are held on the third Monday of each month. Meetings are open to the public, with meeting dates advertised annually in the Borough paper of record and presented on the Borough website. Regular monthly meetings include an agenda item as part of the Manager's Report specific to discussion regarding the Borough MS4 program. The Borough Secretary files copies of advertisements, meeting agendas, meeting minutes, and audience sign-in sheets for all public meetings related to the Borough MS4 program in the Borough's MCM #2 compliance documentation binder.

#### Public Meetings – Annual MS4 Meeting

In addition to MS4 reports presented as part of the typical monthly meeting agenda, an annual MS4 presentation is provided by the Borough Engineer during a Borough Council Meeting. The presentation includes updates on the progress of implementation of the SWMP and identifies future implementation plans. This presentation is advertised during a preceding meeting, with notification placed on the Borough Website and posted at the Borough Office to inform residents of the presentation. As with all items discussed by the Borough Council, Borough residents in attendance are provided the opportunity to comment on SWMP and MS4 program. The Borough Secretary files copies of advertisements, meeting agendas, meeting minutes, and audience sign-in sheets for all public meetings related to the Borough MS4 program in the Borough's MCM #2 compliance documentation binder.

### Public Reporting of Illicit Discharges

The Borough encourages residents to report illicit discharges through various methods. The Borough website provides an electronic complaint submittal form for use of residents in reporting illicit discharges. A form is also available on the website for residents to print and submit in hard copy form to the Borough. Residents may also report illicit discharges via phone or in person at the Borough Office to Borough staff. Borough administrative staff completes illicit discharge complaint forms for complaints received by phone or in person. Refer to MCM #3 for more detail regarding Borough procedure for resolution of illicit discharge complaints.

### MCM #3 - ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDD&E)

*Federal regulations require municipalities to develop a program that meets the following:*

- *Develop, implement, and enforce a program to detect and eliminate illicit discharges into the MS4 (40 CFR Part 122.34(b)(3)(i)).*
- *Develop, if not already completed, a storm sewer system map, showing the location of all outfalls and the names and locations of all surface water of the Commonwealth that receive discharges from those outfalls (40 CFR Part 122.34(b)(3)(ii)(A)).*
- *To the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, non-stormwater discharges into your storm sewer system and implement appropriate enforcement procedures and actions (40 CFR Part 122.34(b)(3)(ii)(B)).*
- *Develop and implement a plan to detect and address non-stormwater discharges, including illegal dumping, to your system (40 CFR Part 122.34(b)(3)(ii)(C)).*
- *Inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste (40 CFR Part 122.34(b)(3)(ii)(D)).*

### MCM #3 BEST MANAGEMENT PRACTICES (BMPs)

*Best Management Practices must be utilized to meet Minimum Control Measure No. 3. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

1. *Develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the Sewickley Borough's regulated MS4s.*
2. *Develop and maintain a map of the regulated small MS4. The map must show the location of all outfalls and the location and names of all surface waters that receive discharges from those outfalls.*
3. *Develop and maintain a map of the regulated small MS4. The map must show the entire storm sewer collection system, including roads, inlets, piping, swales, catch basins, channels, basins, and any other features of the permittee's storm sewer system including municipal boundaries and watershed boundaries.*
4. *Conduct outfall field screening, identify the source of any illicit discharges, and remove or correct any illicit discharges.*

5. *Enact a stormwater management ordinance to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated MS4.*
6. *Provide educational outreach about the program to detect and eliminate illicit discharges.*

BMP #1 - Develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated MS4. Conduct dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters.

**Measurable goal: Implement, evaluate and revise the Illicit Discharge Detection and Elimination (IDD&E) Plan each permit year as necessary.**

#### Illicit Discharge Detection and Elimination Written Plan

The Borough has implemented and maintains this written Illicit Discharge Detection and Elimination (IDD&E) Plan that establishes the goals, techniques, roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of each BMP for this MCM. The IDD&E Plan is detailed as part of this BMP and also is incorporative of the remaining MCM #3 BMPs listed below. In summary, the purpose of the IDD&E plan is to implement a procedure to monitor and screen discharges from each MS4 outfall to eliminate non-stormwater or illicit discharges from entering Waters of the Commonwealth.

#### IDD&E Plan Review

This IDD&E plan is reviewed periodically, at a minimum of once per year. The review of the plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #3 compliance binders. The review log details the dates, scope, reviewing parties and revisions made as a part of each review.

#### Outfall Screening

An annual outfall screening program is conducted by the Borough, with assistance of the Borough Engineer. Each of the Borough's identified regulated MS4 outfalls is screened at least once during the Borough's five year permit cycle.

More frequent screening is conducted for priority outfalls. Information regarding identification of priority outfalls and screening protocol for these outfalls can be found below.

Outfall screening is conducted only during periods of dry weather. As defined in the Borough's Authorization to Discharge, dry weather is a continuous time interval without stormwater producing events that immediately follows an initial 48 hour period with no stormwater producing events. Accordingly, no outfall screening is conducted within 48 hours of the end of a stormwater producing event.

During the screening process, investigators complete an Outfall Reconnaissance Inventory/Sample Collection Field Sheet (ORI), as excerpted from the Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments (CWP, October 2004), to document results of screening at each outfall. Complete detailed information regarding completion of the ORI can be found in the following paragraphs. Photographic documentation of the condition of each outfall at the time of screening is attached to each ORI.

A visual evaluation of the outfall is conducted to determine the necessary steps to complete comprehensive screening of each outfall. If no dry weather flow is observed, the ORI is completed as detailed below and no illicit discharge follow up is required.

If the visual evaluation reveals a dry weather flow, the outfall is revisited after the initial screening following another dry weather period. If dry weather flow remains, a sample is taken to evaluate the presence of pollutants. Outfalls found to contain dry weather flow are tested for specific chemical and biological parameters that would be present within an illicit discharge. Samples are tested on-site for temperature, pH, turbidity, ammonia, chlorine, detergents, and phenols. Additionally, samples are delivered to Campbell Laboratory in New Brighton, Pennsylvania to be evaluated for the presence of fecal coliform.

#### Outfall Reconnaissance Inventory/Sample Collection Field Sheet

The Outfall Reconnaissance Inventory (ORI) is a simple method of collecting the necessary data to help aid in detecting illicit discharges within an MS4. Outfall Reconnaissance Inventory field sheets are used to record information for each MS4 outfall visited in the field. Outfall screeners use the Borough MS4 Maps, as detailed in BMPs 2 and 3, below to locate the municipal outfalls. Each outfall is photographed as well as characterized with the help of the ORI data form. The ORI data form is broken up into eight sections that address both flowing and non-flowing outfalls. These data forms apply to all outfalls. The following paragraphs

detail information collected and reported for each section of the ORI data form during screening for each outfall:

#### Section 1: Background Data

Section 1 of the ORI data form contains background data. The information within this section includes subwatershed, outfall identification number, the date and time the outfall is visited, investigators, temperature, rainfall, latitude, longitude, camera information, GPS data, land use information, and any notes regarding the origin of the outfall. Names and/or initials of the individuals conducting the screening are identified in the sections noted "Investigators" and "Form completed by". Rainfall information for past weather conditions within the area in question is obtained from the National Oceanic and Atmospheric Administration (NOAA) in order to complete the rainfall fields of the form.

#### Section 2: Outfall Description

In this section of the ORI data form, basic characteristics of the outfall are noted and used to supplement and confirm prior outfall data and improve upon mapping. The characteristics included are outfall material, shape, dimension, location, whether or not an outfall is submerged in water or sediment, and whether the outfall is or is not flowing. The severity of the outfall's submersion and flow are also characterized. Typical pipe sizes include (in.): 12, 15, 18, 24, 30, 36, and 42.

#### Section 3: Quantitative Characterization

This section details a more direct measurement of flowing outfalls. Rate of flow, temperature, pH and ammonia readings are recorded in this section. For the rate of flow, the time (seconds) it takes to fill a known volume (in liters) is used. Temperature is taken using a provided thermometer and recorded in degrees Fahrenheit; test strips are used to measure the flow's pH (pH units) and ammonia (mg/L).

To better detect potential illicit discharges, tests for phenols, chlorine, and detergents are also carried out through colorimetric analysis. Colorimetric analysis uses reagents that cause a color change when a certain concentration of contaminant is present within the flow sample. The concentration is determined by comparing the color of the tested sample with a visual color comparator. Investigators are equipped with an MS4 test kit containing all of the supplies required to test for these three indicators. All results are recorded on the ORI data form.

#### Section 4: Physical Indicators for Flowing Outfalls

This section is used to report indicators such as turbidity, color, floatables, and odors within the flow. A visual/scent estimate is conducted to complete this section.

#### Section 5: Physical Indicators for both Flowing and Non-Flowing Outfalls

This section itemizes physical indicators for both flowing and non-flowing outfalls. The physical indicators in this section include outfall damage, deposits/stains, abnormal vegetation, poor pool quality, and pipe benthic growth. These factors are evaluated based on the visual observation of the outfall.

#### Section 6: Overall Outfall Characterization

This section is determined by the total presence of indicators at the particular outfall in question. Obvious discharge outfalls contain illicit discharges that do not require a sample collection for confirmation. Suspect discharge describes a flowing outfall with high severity on one or more physical indicators. Potential discharge can be a flowing or non-flowing outfall with the presence of two or more physical indicators. Finally, an unlikely discharge is a non-flowing outfall with no physical indicators of an illicit discharge.

#### Section 7: Data Collection

This section states whether or not a sample was collected for the lab, where the discharge was collected (flow or pool), and if an intermittent flow trap was set.

#### Section 8: Any Non-Illicit Discharge Concerns

Section 8 is an open section used for any concerns that are not included within the rest of the ORI data form. This is where problems such as trash, excessive yard waste, hidden outfall, broken infrastructure, etc. are listed.

#### Outfall Screening Reporting

A summary memo of the outfall screening progress is prepared annually for the Borough by the Borough Engineer. The outfall screening summary memo provides data regarding the number of outfalls screened in that permit year and the aggregate percentage completed to date for the permit cycle. The outfall screening summary memo provides a tabulation of the number of outfalls tested in the current permit year that were discovered to have a dry weather flow. All required follow-up is then presented in the screening summary memo. A listing

of all illicit discharges, with applicable test results for each parameter is provided along with a listing of non-illicit discharge outfall maintenance, as described below. The annual outfall screening summary memo is provided by the Borough Engineer to the Borough Manager. Based on the scope of the summarized findings, the Borough Manager assigns follow-up tasks regarding illicit discharges and outfall maintenance to staff as needed and as detailed in the following sections.

### Identifying Sources of Illicit Discharges

Outfalls where screening identifies any amount of ammonia, chlorine, detergents, phenols, or fecal coliform are considered illicit discharges. Once identified through screening, illicit discharges are evaluated by the Public Works Department with assistance of the Code Enforcement Office and Borough Engineer, as needed. The purpose of this evaluation is to determine the source of each identified illicit discharge and subsequently the manner in which the illicit discharge can be eliminated.

Initial investigation of each illicit discharge begins with a review of the Borough's MS4 map. As detailed in BMPs #2 and #3, the map contains comprehensive data of the Borough MS4 system. A review of the location of the outfall on the map is used to narrow the potential source of the illicit discharge based on the outfall's tributary or storm sewershed area, surrounding topography and upstream storm sewer connectivity.

Once the area tributary to the illicit discharge is identified, a field review of area is initiated by the Public Works Department. A surface evaluation of the area is conducted to identify any sources of surface runoff entering the MS4 system at an inlet, catch basin, headwall or other structure.

If the surface evaluation of the tributary area does not identify the illicit discharge source, a closed circuit televising (CCTV) survey of the conveyance system upstream of the outfall is conducted by the Public Works Department. CCTV surveys are used to determine the presence of any connections to the MS4 storm sewers or instance of infiltration or inflow of groundwater into the conveyance system.

Results of investigation of illicit discharge sources through surface evaluations, CCTV surveys or other methods are filed in the Borough's MCM #3 compliance documentation binder by the Borough Manager.

### Illicit Discharge Elimination

The Borough Manager is responsible for oversight of procedures to eliminate illicit discharges. Means and methods of elimination of identified illicit

discharges are determined on a case-by-case basis dependent on the nature and source of the illicit discharge, however, the procedures to be implemented are generally as follows. In instances where outfall screening follow up identifies a resident, business or other private entity within the Borough directly discharging non-stormwater runoff to the Borough MS4 system or Waters of the Commonwealth (other than as exceptions are specifically listed in the Borough Prohibited Discharge Ordinance No. 1336), the Borough Code Enforcement Office issues a Notice of Violation to the responsible party. The Notice of Violation clearly identifies the remediation activities required specific to the identified illicit discharge such that prohibited discharges to the Borough MS4 cease immediately. Failure to comply with the terms of the Notice of Violation results in enforcement of penalties per the Prohibited Discharge Ordinance as levied by the Code Enforcement Officer.

Where dry weather flow is observed, but a specific point illicit discharge source cannot be determined based on surface inspections, CCTV surveys or other methods of follow-up, illicit discharge elimination procedures are based on the pollutants discovered during the screening and the nature of the tributary area. For example, if an outfall was determined to have a high detergent content and is located downstream of a residential area, educational material in the form of door hangers or flyers are distributed to inform residents of proper procedures for car washing. Similarly, if a high chlorine content is discovered notification of proper procedures for draining of a swimming pool is disturbed to nearby pool owners. Continued monitoring of these outfalls are conducted as described in the priority areas section below.

Implemented procedures and results of all illicit discharge elimination are documented by the Borough Manager in the Borough's MCM #3 compliance binder.

#### Non-Illicit Discharge Outfall Maintenance

As part of the annual outfall screening program, outfalls are reviewed to identify the need for general maintenance or repairs. Outfalls are evaluated to determine whether they are functioning properly and if there are any conditions at the outfall that may contribute to the illicit discharges. The review generally consists of the following:

- Evaluation of accumulation of sedimentation or debris.
- Evaluation of erosion evident at the discharge location and the presence of adequate outfall protection.
- Evaluation of the structural condition of the outfall pipe, endwall, end section, etc.
- Evaluation of drainage conditions downstream of the outfall, submergence of the outfall and standing water present.

- Evaluation of the surrounding vegetation at the outfall and the need for clearing and removal of overgrowth of brush.

Maintenance and repairs are noted on the ORI during the screening process. These items are addressed by the Department of Public Works. Once maintenance items are completed, written and photographic documentation of completed work is filed in the Borough's MCM #3 compliance binder

Priority Areas

Priority area outfalls are outfalls which require screening at intervals more frequent than the required once per permit cycle interval. Priority outfalls areas identified by the Borough have one or more of the following characteristics:

- Known, continuous dry weather flow.
- Past screening has identified the presence of pollutants.
- Located in industrial areas.
- Located in areas with known pollution or dumping problems.

Activities and screening related to each priority area outfall is tracked in a log included in the Borough's MCM #3 compliance documentation binder. This log is maintained by the Borough Manager. Each priority area outfall, including any municipal outfall found to contain dry weather flow is screened annually. Priority outfalls found to contain illicit discharges are evaluated and addressed in accordance with the Illicit Discharge Elimination procedures above.

BMP #2 - Develop and maintain a map of your regulated small MS4. The map must show the location of all outfalls and the location and names of all surface waters of the Commonwealth (e.g., creek, stream, pond, lake, basin, swale, channel) that receive discharges from those outfalls.

**Measurable goal: Annually review and update the Borough's MS4 Map.**

BMP #3 - Develop and maintain a map of the regulated small MS4. The map must show the entire storm sewer collection system, including roads, inlets, piping, swales, catch basins, channels, basins, and any other features of the permittee's storm sewer system including municipal boundaries and watershed boundaries.

**Measurable goal: Annually review and update the Borough's MS4 Map.**

## MS4 Mapping

Mapping of the Borough's regulated MS4 is maintained, reviewed and updated periodically, on a minimum basis of once annually. Annual reviews are completed by the Borough Manager, Public Works Department and Engineer. MS4 mapping is generated using GIS software with the assistance of the Borough Engineer.

- Municipal Boundary – The limits of the Borough boundary are delineated on the map, along with boundaries and names of adjacent municipalities.
- Urbanized Area – The location of the urbanized area is delineated, as defined by the most recent U.S. Decennial Census.
- Topography – Contours at 20' intervals are provided to demonstrate topographical conditions throughout the Borough.
- Roadways – The location and name of all Borough, private, State and County owned roadways are shown on the map. Curbed sections of Borough roadways are symbolized as such to identify outfalls or observation points located where curbs discharge concentrated runoff.
- Waters of the Commonwealth – The name and location of all surface waters of the Commonwealth are shown on the map. The tributary area of each watershed is delineated for each waterway.
- Outfalls – Each outfall regulated by the Borough's MS4 permit is shown on the map with its three digit identification number. Once screening is completed on an outfall, symbology of the outfall is altered to identify outfalls with continuous dry weather flow or outfalls where illicit discharges have been detected. Known outfalls discharging runoff collected from private property or that is collected and conveyed by a private storm sewer system are symbolized on the map accordingly. Similarly, outfalls owned by other governmental agencies (i.e. PennDOT and Allegheny County) or that discharge stormwater collected from State or County owned roadways or facilities are also noted as such. These non-municipal outfalls are shown on the MS4 map for informational purposes only. These outfalls are not included in the Borough's MS4 outfall total, nor are these outfalls screened under the Borough's IDD&E program.
- Observation Point – The map identifies the location of all observation points. Observation points are identified on the map in locations that area included as part of the annual screening program, but are not technical outfalls. Observation points are implemented for several reasons. Observation points are implemented in locations where testing at an actual

outfall is impractical or impossible, based on geographic conditions (ie. if the outfall is in a location that direct screening would be hazardous to the investigator), private property issues (ie. if an outfall is located on private property that is inaccessible to the Borough or its designees) or other factors. Observation points are also used in locations where several discharge points contribute to a single outfall. These observation points are implemented to isolate and segment individual portions of the MS4 to identify and evaluate sources of illicit discharges. Finally, observation points are shown and noted in all locations where conveyed runoff leaves the Borough owned MS4 and enters a private conveyance system or other MS4 (State, County or adjacent municipality). These observation points are used to screen runoff leaving the Borough's regulated MS4 to identify any illicit discharge leaving the Borough MS4.

- Stormwater collection and conveyance system – The map includes all components of the conveyance system associated with the Borough MS4, including, but not limited to inlets, catch basins, manholes, pipes, swales, channels, roadside ditches, headwalls and endwalls. When known, the location of private, State or County owned collection and conveyance systems are shown, and symbolized to delineate their ownership apart from those facilities included in the Borough's regulated MS4. These facilities are shown for informational purposes only and are not included in the maintenance activities by the Borough for compliance with MCM #6.
- Post-Construction Stormwater Management BMPs – The location and names of all known PCSM BMPs within the Borough are shown on the map. PCSM BMP names noted are presented to coordinate with the names listed in the Borough's PCSM BMP inventory, as detailed in MCM #5. Symbology on the map is used to identify the type of BMP. Additionally, PCSM BMPs owned and maintained by the Borough are identified and symbolized as such.
- Municipal Facilities – The name and location of all Borough owned and maintained facilities are shown on the map. Names identified on the map correspond to the municipal facility inventory developed as part of MCM #6.

BMP #4 – Following the IDD&E program created pursuant to BMP #1, the permittee shall conduct outfall field screening, identify the source of any illicit discharges, and remove or correct any illicit discharges using procedures developed under BMP #1

**Measurable goal: Implement the IDD&E Program. Screen each of the identified regulated small MS4 outfalls screened at least once during each permit coverage term. Complete screening of 20% of the known outfalls annually.**

#### Annual Screening Program

The Borough implements an annual outfall screening program, with assistance of the Borough Engineer. The outfall screening program is conducted as detailed in the IDD&E Plan as part of BMP #1, above. To comply with the permit requirement that each outfall is screened during the 5 year permit cycle, approximately 20% of the Borough's outfalls are screened during each permit year. Additionally, all priority area outfalls and outfalls with known continuous dry weather flow are screened each permit year. When implementing the IDD&E Plan, the Borough includes all outfalls and observation points in its 5 year screening cycle.

*BMP #5 – Enact a stormwater management ordinance to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated MS4.*

**Measurable goal: Maintain, update, implement, and enforce a Stormwater Management Ordinance that prohibits non-stormwater discharges to the regulated MS4.**

#### Prohibited Discharge Ordinance

The Borough Stormwater Management Ordinance No. 1336, enacted August 2015, contains provisions prohibiting non-stormwater discharges to the Borough MS4. This Ordinance is reviewed periodically, at a minimum of once per year. The review of the Ordinance is conducted by the Borough Manager and Code Enforcement Officer who incorporate input from Borough staff members, the Borough Engineer, Borough Solicitor, the members of the Borough Council and other individuals active in enforcement of the Ordinance. Based upon the results of this review revisions are made to the Ordinance as needed. Revisions to the Ordinance are reviewed and adopted by the Borough Council following advertisement of the Ordinance adoption and solicitation of public comment.

#### Ordinance Enforcement

The Borough Code Enforcement Officer enforces the Borough Prohibited Discharge Ordinance. All enforcement procedures are documented in writing by Code Enforcement Officer. When violations are observed, enforcement is in accordance with applicable Borough Ordinances and at the discretion of the Code Enforcement Office may include, but are not limited to:

- Written warning
- Notice of Violation
- Levying of Fines
- Injunctive or mandamus action

*BMP #6 – Provide educational outreach to public employees, business owners and employees, property owners, the general public and elected officials about the program to detect and eliminate illicit discharges. Educational outreach should include distribution of brochures and guidance for target audiences including schools, programs to encourage and facilitate public reporting of illicit discharges, organization of volunteers to locate and visually inspect outfalls and stencil storm drains, and implementing and encouraging recycling programs for common wastes such as motor oil, antifreeze and pesticides.*

**Measurable goal: Distribute appropriate educational information concerning illicit discharges using methods outlined in MCM #1. Implement a stormwater pollution reporting mechanism for the public to use to notify the Borough of illicit discharges, illegal dumping or outfall pollution. Respond to all complaints in a timely and appropriate manner. Document all responses, include the action taken, the time required to take the action, whether the complaint was resolved successfully.**

#### Borough Staff Illicit Discharge Training

A training presentation is annually provided by the Borough Engineer to all Borough employees during each permit year as part of MCM #6. A portion of the annual training focuses on the identification, reporting, and resolution of illicit discharges. All Borough Staff participates in the training session, including the administration staff, code enforcement office, and public works department. Representatives of the Police Department, Fire Department and EMS are trained and distribute training material to the remaining members of each department. Documentation of annual staff training is kept in the Borough's MCM #6 compliance documentation binder and includes sign-in sheets listing the attendees, presentation handouts or slides identifying the topics discussed and presented.

#### Illicit Discharge Educational Material

Educational material regarding illicit discharges is distributed annually as part of MCM #1. Additional material is distributed by the Borough Code Enforcement Officer in areas of known or suspected illicit discharges when identified by Borough Staff, reported by residents or discovered during annual outfall screening. Door hangers, flyers, pamphlets or mailings specific to the illicit discharges are used and documented in the Borough MCM #1 compliance documentation binder and tracked in the Public Education Log by Code Enforcement when distributed.

#### Illicit Discharge Violation/Complaint Tracking

In addition to illicit discharge violations observed by Borough officials or staff, the Borough accepts complaints, questions or concerns of via telephone call to the Borough Office, in person at the Borough Office or via a complaint form available for submission on the Borough website. Complaints are generally received by the administrative staff and forwarded to the Code Enforcement Officer. An individual complaint form is completed for each complaint received. All actions taken by the Borough in response to the complaint are documented in writing and filed in the MCM compliance documentation binder.

Documentation of the nature and resolution of each complaint is maintained by the Code Enforcement Officer. In addition to the individual complaint form, a summary tracking form is maintained. This tracking form documents the date, nature, location and initiator of the initial complaint, along with the date and method of resolution of the complaint. All documentation is filed by the Borough Code Enforcement Officer in the Borough's MCM #4 compliance binder.

## MCM #4 CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

*Federal regulations require municipalities to develop a program that meets the following:*

- *Develop, implement, and enforce a program reduce pollutants in any stormwater runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre that are part of a larger common plan of development or sale that equals one acre or more (40 CFR Part 122.34(b)(4)(i)).*
- *Develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law (40 CFR Part 122.34(b)(4)(ii)(A)).*
- *Require construction site operators to implement appropriate erosion and sediment control best management practices (40 CFR Part 122.34(b)(4)(ii)(B)).*
- *Develop and implement requirements for construction site operators to control waste at the construction site that may cause adverse impacts to water quality. These wastes can include discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste (40 CFR Part 122.34(b)(4)(ii)(C)).*
- *Develop and implement procedures for site plan review which incorporate consideration of potential water quality impacts (40 CFR Part 122.34(b)(4)(ii)(D)).*
- *Develop and implement procedures for receipt and consideration of information submitted by the public (40 CFR Part 122.34(b)(4)(ii)(E)).*
- *Develop and implement procedures for site inspections and enforcement of control measures (40 CFR Part 122.34(b)(4)(ii)(F)).*

## MCM #4 BEST MANAGEMENT PRACTICES (BMPs)

*Best Management Practices must be utilized to meet Minimum Control Measure No. 4. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

1. *Develop a program consisting of all procedures necessary to comply with the requirement of this MCM. The program shall provide for stormwater permitting, construction inspection, and enforcement of installation and maintenance of the necessary E&S control measures. The program shall describe clearly how it will be coordinated with DEP's NPDES Construction Stormwater Permitting Program.*
2. *Enact, implement and enforce an ordinance to require the implementation of erosion and sediment control BMPs, as well as sanctions to ensure compliance.*

3. *Develop and implement requirements for construction site operators to control waste at the construction site that may cause adverse impacts to water quality.*
4. *Develop and implement procedures for the receipt and consideration of public inquiries, concerns, and information submitted by the public regarding local construction activities. Sewickley Borough shall demonstrate acknowledgement and consideration of the information submitted, whether submitted verbally or in writing.*

*BMP #1 - Develop a program consisting of all procedures necessary to comply with the requirement of this MCM. The program shall provide for stormwater permitting, construction inspection, and enforcement of installation and maintenance of the necessary E&S control measures. The program shall describe clearly how it will be coordinated with DEP's NPDES Construction Stormwater Permitting Program.*

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, implement, evaluate and revise the MCM #4 written plan each permit year as necessary.**

#### Construction Site Runoff Control Plan

The Borough of Sewickley has opted to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities.

In addition to reliance on Pennsylvania's program for issuance of NPDES Permits for Stormwater Discharges Associated with Construction Activities, the Borough maintains this written plan that establishes clear roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of this MCM. The written plan is detailed as part of each BMP for MCM #4 listed below. This written plan is reviewed periodically, at a minimum interval of once annually. The review of the written plan is conducted by the Borough Manager and Code Enforcement Officer who incorporate input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #4 compliance binders. The log details the dates, scope, reviewing parties and revisions made as a part of each review.

## Memorandum of Understanding

The Borough has entered into a Memorandum of Understanding (MOU) with the Allegheny County Conservation District with regard to defining the responsibilities of each entity for compliance with the requirements of MCM #4. This MOU is kept on file as part of the Borough's MCM #4 compliance documentation binder. As part of this MOU, the Borough will not issue a building or other permit until the DEP has issued an individual NPDES Permit, or DEP or the Allegheny County Conservation District (ACCD) has approved coverage under the general NPDES Permit for Stormwater Discharges Associated with Construction Activities.

*BMP #2 - Enact, implement and enforce an ordinance to require the implementation of erosion and sediment control BMPs, as well as sanctions to ensure compliance.*

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, enforce the Borough Stormwater Management Ordinance that requires implementation of erosion and sedimentation control best management practices and sanctions to ensure compliance.**

## Stormwater Management Ordinance

In addition to reliance on Pennsylvania's program for issuance of NPDES Permits for Stormwater Discharges Associated with Construction Activities, the Borough maintains and enforces an Ordinance that requires implementation and maintenance of erosion and sediment (E&S) control BMPs. The Borough Stormwater Management Ordinance No. 1335, enacted August 2015, contains provisions requiring E&S BMPs. This Ordinance is reviewed periodically, at a minimum interval of once annually. The review of the Ordinance is conducted by the Borough Manager and Code Enforcement Officer who incorporate input from Borough staff members, Borough Engineer, Borough Solicitor, the members of the Borough Council and other individuals active in enforcement of the Ordinance. Based upon the results of this review revisions are made to the Ordinance as needed. Revisions to the Ordinance are reviewed and adopted by the Borough Council following advertisement of the Ordinance adoption and solicitation of public comment.

BMP #3 - Develop and implement requirements for construction site operators to control waste at the construction site that may cause adverse impacts to water quality. While sediment is the most common pollutant of concern for MCM #4, there are other types of pollutants that can also be a concern and the intent of this BMP is to address these other types of pollutants, such as, but not limited to, discarded building materials, washout from concrete trucks, chemicals, litter, and sanitary waste.

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, enforce Borough Stormwater Management Ordinance and MS4 Prohibited Discharge Ordinance requirements, through routine site inspections of active construction sites, requirement of written Erosion and Sedimentation Control plans for applicable projects, standard notes on the site plans, by any other written format that accomplishes the objectives of this BMP, or by any combination of these measures.**

#### Construction Site Erosion and Sedimentation Control Site Inspections

In addition to reliance on Pennsylvania's program for issuance of NPDES Permits for Stormwater Discharges Associated with Construction Activities, the Borough implements a site inspection program to review the Erosion and Sedimentation Controls at all active construction sites within the Borough. Periodic site inspections are conducted by the Borough Code Enforcement Officer on a monthly basis, at a minimum. More frequent inspections are conducted, as needed, for sites found to be in violation of Borough Ordinance, for sites with greater potential for pollution, and after significant rainfall events.

The findings of each site inspection are documented by the Borough Code Enforcement Officer. Records of all site inspections and enforcement activities are filed by the Code Enforcement Officer in the Borough's MCM #4 compliance documentation binder. All enforcement procedures are documented in writing by the Code Enforcement Officer. When violations are observed, enforcement is in accordance with applicable Borough Ordinances and at the discretion of the Code Enforcement Officer may include, but are not limited to:

- Written warning
- Notice of Violation
- Issuance of Stop Work Order
- Revocation of Permit

Upon remediation of on-site violations, the Code Enforcement Officer conducts a follow-up inspection. The findings of the follow-up inspection are documented in writing, and filed in the MCM #4 compliance documentation binder.

BMP #4 – Develop and implement procedures for the receipt and consideration of public inquiries, concerns, and information submitted by the public regarding local construction activities. Demonstrate acknowledgement and consideration of the information submitted, whether submitted verbally or in writing.

**Measurable goal: In addition to opting to rely on DEP’s statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, implement a tracking system to keep a record of any submitted public inquiries, concerns or information regarding construction site stormwater runoff control as well as the response, actions, and results associated with each inquiry or concern. Prepare and maintain records of site inspections, including dates and results.**

#### Construction Site Runoff Complaint Tracking

In addition to reliance on Pennsylvania’s program for issuance of NPDES Permits for Stormwater Discharges Associated with Construction Activities, the Borough implements a tracking system to inventory, address and document complaints received regarding construction site runoff. The Borough accepts complaints, questions or concerns of resident via telephone call to the Borough Office or in person at the Borough Office. Complaints are generally received by the administrative staff and forwarded to the Code Enforcement Officer. An individual complaint form is completed for each complaint received. All actions taken by the Borough in response to the complaint are documented in writing.

Documentation of the nature and resolution of each complaint is maintained by the Code Enforcement Officer. In addition to the individual complaint form, a summary tracking form is maintained. This tracking form documents the date, nature, location and initiator of the initial complaint, along with the date and method of resolution of the complaint. All documentation is filed by the Borough Code Enforcement Officer in the Borough’s MCM #4 compliance binder.

## MCM #5 POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) IN NEW AND RE-DEVELOPMENT ACTIVITIES

*Federal regulations require municipalities to develop a program that meets the following:*

- *Develop, implement, and enforce a program to address stormwater runoff from new development and 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, that discharge into your small MS4. Your program shall ensure that controls are in place that would prevent or minimize water quality impacts (40 CFR Part 122.34(b)(5)(i)).*
- *Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs) appropriate for your community (40 CFR Part 122.34(b)(5)(ii)(A)).*
- *Use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State, Tribal or local law (40 CFR Part 122.34(b)(5)(ii)(B)).*
- *Ensure adequate long-term operation and maintenance of BMPs (40 CFR Part 122.34(b)(5)(ii)(C)).*

### MCM #5 BEST MANAGEMENT PRACTICES (BMPs)

*Best Management Practices must be utilized to meet Minimum Control Measure No. 5. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

1. *Develop a written procedure that describes how the permittee shall address all required components of this MCM.*
2. *Require the implementation of a combination of structural and/or non-structural BMPs that are appropriate to the local community, that minimize water quality impacts, and that are designed to maintain pre-development runoff conditions.*
3. *Ensure that controls are installed that shall prevent or minimize water quality impacts.*
4. *Enact, implement, and enforce an ordinance or other regulatory mechanism to address post-construction stormwater runoff from new development and redevelopment projects, as well as sanctions and penalties associated with non-compliance, to the extent allowable under State or local law.*

5. *Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new and redevelopment. Measures also should be included to encourage retrofitting LID into existing development.*
6. *Ensure adequate operation and maintenance of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).*

BMP #1 - Develop a written procedure that describes how the permittee shall address all required components of this MCM. Guidance can be found in the Pennsylvania Stormwater Best Management Practices Manual. This plan shall include the following components:

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, implement, evaluate and revise the MCM #5 written plan each permit year as necessary.**

Post-Construction Stormwater Management (PCSM) in New and Re-Development Activities Plan

The Borough has opted to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities.

In addition to reliance on Pennsylvania's program for issuance of NPDES Permits for Stormwater Discharges Associated with Construction Activities, the Borough maintains this written plan that establishes clear roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of this MCM. For compliance with the requirements of this MCM the Borough supplements its reliance on DEP's statewide program by implementing minimum requirements for use of PCSM BMPs in plans for development and redevelopment and establishing criteria for selecting and standards for sizing stormwater BMPs through enforcement of the Borough Stormwater Management Ordinance and MS4 Prohibited Discharge Ordinance. Further detail regarding these items can be found as part of BMPs #4 and #5, below. The Borough also implements an inspection program for PCSM BMPs, as detailed in BMP #6, below. This written plan, as detailed as part of each MCM #5 BMP listed below, is reviewed periodically, at a minimum interval of once annually. The review of the written plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other

individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #5 compliance binder. The log details the dates, scope, reviewing parties and revisions made as a part of each review.

BMP #2 - Require the implementation of a combination of structural and/or non-structural BMPs that are appropriate to the local community, that minimize water quality impacts, and that are designed to maintain pre-development runoff conditions. This requirement can be met by ensuring that the selected BMPs comply with the municipal Stormwater Management Ordinance that meets the requirements of the General Permit.

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, review all qualifying development or redevelopment projects to ensure that their post-construction stormwater management plans and selected BMPs conform to the applicable requirements. Maintain a tracking system (e.g., database, spreadsheet, or written list) to record qualifying projects and their associated BMPs.**

#### Review of Development and Redevelopment Projects

The Borough Sewickley has opted to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities. Additionally, as required by the Borough Stormwater Management Ordinance, final approval for development or redevelopment projects is not given by the Borough until documentation of an NPDES Permit as issued by Allegheny County Conservation District for the project is provided. All PCSM BMPs installed as part of new development or redevelopment activities are tracked as part of the Borough's PCSM BMP Inventory. Refer to MCM #5, BMP #6 for detail regarding the Inventory.

BMP #3 - Ensure that controls are installed that shall prevent or minimize water quality impacts.

**Measurable goal: In addition to opting to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities, inspect all qualifying development or redevelopment projects during the construction phase to ensure proper installation of the approved structural PCSM BMPs. Implement a tracking system (e.g., database, spreadsheet, or written list) to track the inspections**

**conducted and to track the results of the inspections (e.g., BMPs were, or were not, installed properly).**

Inspection of Installation of PCSM BMPs in Development and Redevelopment Projects

The Borough has opted to rely on DEP's statewide qualifying local program for issuing NPDES Permits for Stormwater Discharges Associated with Construction Activities. Additionally, as required by the Borough Stormwater Management Ordinance, final release of escrow or bond for development or redevelopment projects is not given until the Borough receives a copy of the recorded PCSM Plan utilized in obtaining the Notice of Termination of the NPDES Permit for the subject project. With this plan, the design engineer certifies that all PCSM BMPs were installed in accordance with the approved NPDES Permit and PCSM Plan. All PCSM BMPs installed as part of new development or redevelopment activities are tracked as part of the Borough's PCSM BMP Inventory. Refer to MCM #5, BMP #6 for detail regarding the Inventory.

*BMP #4 – Enact, implement, and enforce an ordinance or other regulatory mechanism to address post-construction stormwater runoff from new development and redevelopment projects, as well as sanctions and penalties associated with non-compliance, to the extent allowable under State or local law.*

**Measurable goal: Enforce the Borough Stormwater Management Ordinance that requires implementation of Post-Construction Stormwater Management Best Management Practices (PCSM BMPs) for new and redevelopment projects, as well as sanctions and penalties associated with non-compliance.**

Stormwater Management Ordinance

The Borough Stormwater Management Ordinance No. 1335, enacted August 2015, contains provisions requiring implementation of PCSM BMPs for all development and redevelopment projects. This Ordinance is reviewed periodically, at a minimum interval of once annually. The review of the Ordinance is conducted by the Borough Manager –and Building Inspector/Code Enforcement Officer who incorporate input from Borough staff members, the Borough Engineer, Borough Solicitor, the members of the Borough Council and other individuals active in enforcement of the Ordinance. Based upon the results of this review revisions are made to the Ordinance as needed. Revisions to the Ordinance are reviewed and adopted by the Borough Council following advertisement of the Ordinance adoption and solicitation of public comment.

Ordinance Enforcement

The Borough Code Enforcement Officer enforces the Borough Stormwater Management Ordinance. All plans proposing new development or redevelopment are reviewed for compliance with the provisions of the Ordinance prior to issuance of any permits by the Borough. The Borough Engineer assists the Code Enforcement Officer in review for compliance with the Ordinance, as needed. All projects are reviewed for compliance with the Ordinance. In addition, the Ordinance requires proof of issuance of an ND PES Permit for all qualifying projects in advance of issuance of any Borough permit.

Following plan approval, the Ordinance requires provision of the PCSM BMP record drawing, signed and sealed by the registered professional engineer responsible for its design, certifying installation according to the approved plan prior to issuance of occupancy permits or use of new and redevelopment site.

*BMP #5 – Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new and redevelopment. Measures also should be included to encourage retrofitting LID into existing development. DEP’s Pennsylvania Stormwater Best Management Practices Manual provides guidance on implementing LID practices.*

**Measurable goal: Enforce ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices. Progress with enacting and updating ordinances to enable the use of LID practices shall be summarized in the periodic reports. Review and amend ordinances each permit year, as necessary, to encourage LID.**

#### Stormwater Management Ordinance

The Borough Stormwater Management Ordinance No. 1335, enacted August 2015, contains provisions recommending implementing Low Impact Development Practices, specifically Reducing Stormwater Costs through Low Impact Development (LID) Strategies and Practices Publication Number EPA 841-F-07-006, December 2007. This Ordinance is reviewed periodically, at a minimum interval of once annually with regard to revisions aimed at promoting Low Impact Development. The review of the Ordinance is conducted by the Borough Manager and Code Enforcement Officer who incorporate input from Borough staff members, the members of the Borough Council and other individuals active in enforcement of the Ordinance. Based upon the results of this review revisions are made to the Ordinance as needed. Revisions to the Ordinance are reviewed and adopted by the Borough Council following advertisement of the Ordinance adoption and solicitation of public comment.

BMP #6 – Ensure adequate operation and maintenance of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).

**Measurable Goal: Annually implement, review and update the PCSM BMP inventory and inspection program.**

#### PCSM BMP Inventory

An inventory of PCSM BMPs is maintained by Borough and is continually updated as development projects are reviewed, approved, and constructed. This inventory includes all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to the Borough's regulated small MS4. The inventory also includes all known PCSM BMPs within the Borough constructed prior to March 10, 2003 including PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory is maintained and updated by the Code Enforcement Officer. The inventory includes:

- The name of each PCSM BMP. Names assigned to each BMP are indicative of the BMP's location and correspond to the names identified on the Borough's MS4 map, as described in MCM #3.
- The exact location of the PCSM BMP. Location information of each BMP includes identifiers such as street addresses, development names, and/or Allegheny County tax parcel identification numbers to adequately identify the location of the BMP. As the inventory is updated by the Code Enforcement Officer, corresponding updates are made to the MS4 map with regard to locations of PCSM BMPs.
- Complete contact information (e.g., name, address, phone number) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner.
- A description of the type of BMP.
- For BMPs installed after March 10, 2003, the date of installation. When installation dates for BMPs installed prior to 2003 are unknown, approximate dates are used.
- Maintenance required for the BMP type according to the BMP's Operation and Maintenance Plan. The inventory includes maintenance schedules from the approved plans for PCSM report specific to the subject BMP for all BMPs installed since 2003. For BMPs installed prior to 2003, if original approved plans are unavailable maintenance requirements included in the inventory are based on the Pennsylvania Stormwater BMP Manual or other manuals and resources for the type of BMP.

- For all BMPs installed after March 10, 2003, copies of the approved construction plans and details for the BMP. As-built plans or record drawings are included when available. Construction plans and details for BMPs installed prior to March 10, 2003 are included in the inventory when available.
- The actual inspection/maintenance activities for each BMP. Inspection records notifications are filed by the Code Enforcement Officer in the Borough MCM #5 compliance binder.
- An assessment by the permittee if proper operation and maintenance occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements. Enforcement notifications are filed by the Code Enforcement Officer in the Borough MCM #5 compliance binder.

#### PCSM BMP Inspections

Inspections of each PCSM BMP listed on the above noted inventory are completed on annual basis. The Borough Manager administers implementation of the annual inspection program. In advance of each year's inspections, the Borough Manager notifies the owner or party responsible for operation and maintenance of each BMP of the upcoming inspection. This inspection notification letter informs the recipient of the purpose of the inspection and provides an approximate timeframe for the inspection, should the owner wish to be present.

Annual PCSM BMPs inspections are completed by the Borough with assistance of the Borough Engineer. An inspection form is completed for each PCSM BMP noting the condition of the BMP and identifying any repairs or maintenance required to ensure adequate operation of the BMP. Inspections are completed to review compliance with the approved plans, details and maintenance schedule for the BMP. Where the approved plans, details and maintenance schedule are not available, BMPs are reviewed based on the maintenance requirements noted in the Pennsylvania Department of Environmental Protection Stormwater BMP Manual and the following general criteria:

#### Stormwater Detention Basins

- Review outlet structures for structural damage and accumulation of sediment, debris or any other obstruction in the structure, outfall pipe, orifices grate or trash racks that may impede the functioning of the structure.
- Review basin detention area for siltation and sedimentation deposits, accumulation of garbage or debris, or overgrown vegetation. Detention areas should generally be mowed with vegetation 6"-12" in height and free of trees, shrubs and brush.

- Review embankments for signs of erosion or burrow holes. Embankments should generally be mowed with vegetation 6"-12" in height and free of trees, shrubs and brush.

#### Underground Detention Facilities

- Review tank capacity by entry or through inspections ports to identify any sediment accumulation within the facility. Siltation or sediment accumulated in the facility should be removed.
- Review the outlet structure or orifice plate for sediment, garbage or debris that may impede the functioning of the structure.

#### Rain Gardens/Bio Retention Areas

- Review outlet structures for structural damage and accumulation of sediment, debris or any other obstructions that may impede the functioning of the structure.
- Review vegetation and plantings throughout the facility for conformance to the approved plans.
- Review the basin area for accumulations for siltation, sedimentation, garbage or debris.

## MCM #6 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS

*Federal regulations require municipalities to develop a program that meets the following:*

- *Develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations (40 CFR Part 122.34(b)(6)(i)).*
- *Provide employee training to prevent and reduce stormwater pollution from activities such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance (40 CFR Part 122.34(b)(6)(i)).*

### MCM #6 BEST MANAGEMENT PRACTICES (BMPs)

*Best Management Practices must be utilized to meet Minimum Control Measure No. 6. Best Management Practices (BMPs) must show a measureable goal which must be evaluated and reported. The Pennsylvania Department of Environmental Protection (PADEP) requires the following:*

1. *Identify and document all facilities and activities that are owned or operated by the Borough and have the potential for generating stormwater runoff to the regulated small MS4.*
2. *Develop, implement and maintain a written operation and maintenance (O&M) program for all municipal operations and facilities.*
3. *Develop and implement an employee training program.*

*BMP #1 - Identify and document all facilities and activities that are owned or operated by the Borough and have the potential for generating stormwater runoff to the regulated MS4.*

**Measurable Goal: Maintain, review and update the Borough's inventory of municipal operations, facilities, activities and land uses the may contribute to stormwater runoff within Borough's regulated MS4.**

#### Pollution Prevention/Good Housekeeping for Municipal Operations Written Plan

The Borough has implemented and maintains this written Pollution Prevention/Good Housekeeping for Municipal Operations plan that establishes the goals, techniques, roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of each BMP for this MCM. The written plan is detailed as part of each BMP for MCM #6 listed below.

### Pollution Prevention/Good Housekeeping Plan Review

This written plan is reviewed periodically, at a minimum interval of once annually. The review of the written plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan. Based upon the results of each review, revisions are made to the plan as needed. Revisions to the plan are reviewed by the Borough Council and adopted by resolution. Reviews and revisions of the plan are tracked in a review log kept by the Borough in their MCM #6 compliance binders. The review log details the dates, scope, reviewing parties and revisions made as a part of each review.

### Municipal Facility Inventory

A Municipal Facility Inventory is maintained by the Borough and included as part of its MCM #6 compliance documentation binder. The inventory contains a list of all municipal facilities, activities, operations and land uses that contribute runoff to the Borough's regulated MS4. The list is maintained, reviewed and revised as needed by the Borough Manager and Public Works Foreman. Reviews of the list are completed periodically, on a minimum once annually basis.

*BMP #2 - Develop, implement and maintain a written operation and maintenance (O&M) program for all municipal operations and facilities that could contribute to the discharge of pollutants from the regulated small MS4s, as identified under BMP #1. This program (or programs) shall address municipally owned stormwater collection or conveyance systems, but could include other areas (as identified under BMP #1). The O&M program(s) should stress pollution prevention and good housekeeping measures and contain site-specific information.*

**Measurable Goal: Continue to implement the Operations and Maintenance program. Review the O&M program annually, edit as necessary.**

### Operation and Maintenance Program

The Borough has implemented and maintains a written Operation and Maintenance Program plan that establishes the goals, techniques, roles and responsibilities for the implementation of procedures and policies for compliance with the requirements of each BMP for this MCM. This written plan is reviewed periodically, at a minimum interval of once annually. The review of the written plan is conducted by the Borough Manager who incorporates input from Borough staff members, the members of the Borough Council and other individuals active in implementation of the plan.

The O&M Program is written to provide standard operating procedures for each of the activities and facilities noted in the Municipal Facility Inventory developed under BMP #1. Documentation of results of compliance with the O&M Plan is filed in the Borough's MCM #6 compliance documentation binder and is maintained by the Public Works Foreman and Borough Manager.

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 municipal operations to your regulated small MS4s. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. Any municipal employee or contractor shall receive training. This could include public works staff, building / zoning / code enforcement staff, engineering staff (on-site and contracted), administrative staff, elected officials, police and fire responders, volunteers, and contracted personnel. Training topics should include operation, inspection, maintenance and repair activities associated with any of the municipal operations / facilities identified under BMP #1. Training should cover all relevant parts of the Borough's overall stormwater management program that could affect municipal operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

**Measurable goal: Conduct employee training at least annually. Fully document all training in writing and report in periodic reports. Include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s) in compliance documentation.**

#### Annual Elected Officials Training

As part of a regularly scheduled Borough Council Meeting, a training session is conducted for the Borough's elected officials by the Borough Engineer. This presentation provides training to the Borough Council with regard to the Borough's MS4 program, the requirements for the MS4 Permit and the Borough's progress in compliance with permit requirements. Documentation of annual elected official training is kept in the Borough's MCM #6 compliance documentation binder and includes sign-in sheets listing the attendees, presentation handouts or slides identifying the topics discussed and presented.

#### Annual Borough Staff Training

A training presentation is annually provided by the Borough Engineer to all Borough employees during each permit year. All Borough Staff participates in

the training session, including the administration staff, code enforcement office, public works department. Representatives of the Police Department, Fire Department and EMS are trained and distribute training material to the remaining members of each department. This presentation provides training to the with regard to the Borough's MS4 program, the requirements for the MS4 Permit and the Borough's progress in compliance with permit requirements. Staff training contains specific points of discussion for each MCM as it relates the staff responsible for implementation of the plan for that MCM. Documentation of annual staff training is kept in the Borough's MCM #6 compliance documentation binder and includes sign-in sheets listing the attendees, presentation handouts or slides identifying the topics discussed and presented.

### Public Works Training

Periodic training sessions are conducted by the Borough Public Works Foreman for the Public Works staff. Training is held on a once monthly basis to review to review proper BMPs and procedures for Public Works staff member to implement in their day-to-day activities. Topics reviewed generally correspond with the procedures identified in the Borough O&M Program, and are chosen based on the current Public Works project, tasks and activities. Documentation of annual staff training is kept in the Borough's MCM #6 compliance documentation binder and includes sign-in sheets listing the attendees, presentation handouts or slides identifying the topics discussed and presented.