

This public document is a user guide for West Manheim Township staff administering the Township's Municipal Separate Storm Sewer System (MS4) Program.

# Storm Water Management Program (SWMP)

West Manheim Township, York  
County PA Permit #133752

November, 2021, reviewed:

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Stormwater Management Plan  
**West Manheim Township**  
A Small MS4 Community  
2018-2023 Permit Cycle  
2020-2021 Permit Year  
NPDES # 133752

## Stormwater Management Program (SWMP)

West Manheim Township must develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants from the Township's stormwater management system to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act and Pennsylvania Clean Streams Law. There are six Minimum Control Measures (MCMs) that comprise the SWMP. Specific Best Management Practices (BMPs) are identified under each MCM.

The purpose of this written plan is to serve as a guidebook for municipal employees to assist in administering their MS4 Program. This document is meant to be dynamic and changed as the program is administered throughout the year.

A current copy of this document should be kept in the Municipality's physical MS4 files at all times. Program notes should be annotated throughout the year on the pages provided at the end of each section or MCM.

**West Manheim Township shall review its SWMP annually.**

**The Township is a new MS4 community and was issued their MS4 NPDES Permit on January 1, 2021.**

## General Municipal & MS4 Information

### Program Terminology

**Best Management Practices** – Best Management Practice or BMP is a term used to describe a type of water pollution control. BMPs may be structural such as a rain garden or non-structural and relate back to public education or a good housekeeping measure.

**Clean Water Act** - The Clean Water Act (CWA) establishes the basic structure for regulating discharges of pollutants into the waters of the United States and regulating quality standards for surface waters. The basis of the CWA was enacted in 1948 and was called the Federal Water Pollution Control Act, but the Act was significantly reorganized and expanded in 1972. "Clean Water Act" became the Act's common name with amendments in 1972.

**Generating Site** – Generating sites are a small subset of a commercial, industrial, institutional, municipal, and transportation-related operation that have the greatest risk of generating an illicit discharge, i.e. improper disposal of fluids at a vehicle service/repair/carwash, power washing into a storm drain by maintenance employees, improper disposal of grease by restaurant employees.

**Maximum Extent Practicable (MEP)** - means the technology-based discharge standard for municipal separate storm sewer systems established by CWA § 402(p). MEP is achieved, in part, by selecting and implementing effective structural and nonstructural best management practices (BMPs) and rejecting

ineffective BMPs and replacing them with effective best management practices (BMPs). MEP is an iterative standard, which evolves over time as urban runoff management knowledge increases. As such, the operator's MS4 program must continually be assessed and modified to incorporate improved programs, control measures, BMPs, etc., to attain compliance with water quality standards.

**Minimum Control Measures (MCM)** – Minimum Control Measures are one of six (6) program areas in a regulated Small MS4's SWMP Program. The six (6) MCMs are:

- MCM #1 – Public Outreach and Education
- MCM #2 – Public Involvement and Participation
- MCM #3 – Illicit Discharge Detection and Elimination (IDDE)
- MCM #4 – Construction Site Stormwater Runoff Controls
- MCM #5 – Post Construction Stormwater Management (PCSM)
- MCM #6 – Pollution Prevention and Good Housekeeping Measures

**Pennsylvania Clean Streams Law** – The Pennsylvania Clean Streams law was enacted in 1937 and amended several times over the last 83 years. The most recent amendment was in 2014 and pertained to individual NPDES permit applications for Stormwater Discharges Associated with Construction Activities.

**Permittee** – The Municipal NPDES Permit Holder, West Manheim Township.

**Stormwater Management Program (SWMP)** – Is the written program identifying the MS4's annual activities within each of the six (6) Minimum Control Measures (MCM) and their corresponding Best Management Practices (BMP).

## Municipal Resources and Capacity

Every program needs to be right sized for the MS4 Community and decision making must be based upon the municipality's existing resources and capacity. This information is the "how and why" of the MS4 Program.

West Manheim Township is located at the very edge of south western York County and shares its western most border with Adams County and its southern border with the state of Maryland. The Township is approximately 20.10 square miles and as of the 2020 census has a population of 9,072, a 17% increase in the population since the 2010 Census. An increasing population also means a corresponding increase in urbanized area or impervious surfaces that contribute to non-point source runoff.

West Manheim is a newly designated MS-4 community with their permit taking effect on January 1, 2021. The Township's Permit and Notice of Intent are included in the Township's MS4 files and stored electronically on CSDatum (<https://cadatum.com>). All Township staff are available to access CSDatum via a user name and password. Please contact CSDatum to assign staff usernames and passwords. The Township's staff complement consists of nine (9) full-time administrative positions (including the Township Manager and a part-time MS4 Coordinator), the public works department consists of five (5) full-time public work's personnel and two part-time positions, and the Township's Police Department consists of ten (10) people, officers and staff.

The Township's annual budget is \$5.2 Million dollars and of that \$56,000 is allocated towards the Township's MS4 Program. These funds pay for program administration, inspections, and the PRP fee to the York County Regional Stormwater Consortium.

West Manheim Township along with 47 other York County Municipalities have formed a consortium to jointly manage the Chesapeake Bay Pollution Reduction Plan (PRP).

## Administration of the MS4 Program

It is the intent to have the Township's MS4 Program administered by Township staff with guidance and assistance from 3<sup>rd</sup> parties, as needed, according to the Township's capacity and needs. Administration of the program is based upon the Draft PAG-13 (Appendix 5 in CSDatum) with activities focused on the pollutants of concern as identified in the DEP Municipal Requirements Table (Appendix 5 CSDatum).

The program is proactively coordinated by staff via various coordinating meetings held throughout the permit year.

### Program Audits

Audits are a routine occurrence for a designated MS4. The PA Department of Environmental Protection (DEP) audits designated MS4's every three (3) years. The Environmental Protection Agency (EPA) has conducted audits in South Central Pennsylvania, however, those audits are infrequent, most likely in response to repeated complaints, and can carry financial penalties for non-compliance of the PAG-13 and the Clean Streams Act.

The intent of an audit is to ascertain the permittee's compliance with regards to implementation of the program's MCMs:

- MCM #1 - Public Outreach and Education Activities
- MCM #2 - Public Involvement and Participation Activities
- MCM #3 - Illicit Discharge Detection and Elimination Activities
- MCM #4 - Construction Site Stormwater Run Off Activities
- MCM #5 - Post Construction Stormwater Management Activities
- MCM #6 - Pollution Prevention & Good Housekeeping Activities

DEP Audits typically require the following information to be collected, organized, and provided for physical review by the DEP Inspector:

- Annual Status Reports for the last three years
- A copy of the current and all previous NPDES Permits and Notices of Intent
- The following written plans:
  - Written Public Education and Outreach Program (PEOP)
  - Written Public Involvement and Participation Program (PIPP)
  - Written Illicit Discharge Detection and Elimination Program (IDDE)
  - Written Municipal Facilities Operation & Maintenance Program
  - Written Employee Training Program

- An inventory of municipal assets and activities that could have the potential for generating run-off
- A map of the MS4, including outfalls
- The adopted stormwater management ordinance
- Complete inventory of PCSM BMPs that discharge into the MS4
- The executed MOU with the County Conservation District
- The Pollution Reduction Plan

In addition to a document review, DEP will also conduct physical inspections of BMPS, Municipal Facilities, and Outfalls. The intent is to verify what has been reported in municipal documentation and the inspector will be looking for BMPS that require maintenance, outfalls requirement maintenance or inspection, and municipal activities that are not following good housekeeping procedures that are aimed at preventing illicit discharges created by the MS4 Permittee during daily operations.

For additional information on what to expect during a DEP Audit. See the documents and training video's in the Township's files.

- DEP and EPA Audit Preparedness
- DEP MS4 Inspection Training Videos
- Sample NPDES MS4 Inspection Reporting Tool – PA DEP

For additional information on what to expect during an EPA Audit, see the two following documents which have been saved in the Township's MS4 Files.

- MS4 Program Evaluation Guide
- MS4 Program Evaluation Guide Appendix B – Program Evaluation Worksheets





## MCM 1 – Public Outreach & Education

West Manheim Township shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

This MCM is to be reviewed annually. When evaluating this MCM it would be helpful to review EPA's brief guidance document: Stormwater Phase II Final Rule: Public Education and Outreach Minimum Control Measure, Factsheet 2.3. US EPA. September 2018.

**West Manheim Township is currently creating their Public Outreach and Education Plan. The first annual review will be scheduled for the 3<sup>rd</sup> Quarter of 2022.**

### BMP #1: Develop, Implement, and Maintain a Public Education and Outreach Program

The municipality's written Public Outreach and Education Plan (PEOP) is outlined in the following sections: BMP#2, BMP#3, & BMP#4.

### BMP #2: Develop and Maintain a Target Audience List

The municipality will develop and maintain a list of target audience groups that are present within the areas serviced by the permittee's regulated small MS4.

In most communities, the target audiences shall include residents, businesses, (including commercial, industrial, and retailers), developers, schools, and municipal employees. Every year residents and municipal employees and officials will be a high priority target for MS4 education and training. Additionally, municipal staff will select one or two additional segments of the Township's target audience (i.e. a type of generating site or faith-based group) to provide relevant MS4 educational information and/or participation and training opportunities.

The goal of the target audience list is to create the ability to deliberately communicate public education and involvement opportunities to particular groups in the Township, such as religious congregations, young people and families, employers and companies, developers, and generating sites.

The Target Audience contact list is located in CSDatum and the Township's MS4 Files within MCM 1, BMP 1.2 Target Audience List

**Target audience priorities are:**

- **Township Residents**
- **Township municipal employees and elected/appointed officials.**

### BMP #3: Annual Publishing of MS4 Educational Material

West Manheim Township shall annually publish at least one issue of a newsletter, a pamphlet, a flyer, or a website that includes general stormwater educational information, a description of the permittee's SWMP, and/or information about the permittee's stormwater management

activities. The list of published educational materials will be reviewed, maintained, and updated annually. Publications should include a list of references to refer the reader to additional information. The Permittee must implement at least one of the following alternatives:

- Publish and distribute in printed form a newsletter, a pamphlet or a flyer containing information consistent with this BMP.
- Publish educational and informational items including links to DEP's and EPA's stormwater websites on the permittee's website.

Internal information regarding processes for publishing should be included where relevant.

**The Township has published MS4 Information on the website at <https://westmanheimtwp.com> and clicking on the MS4/Stormwater drop down menu. The Township Zoning Officer updates the Township's website as needed. Information to be added to the website should be given to the Township Zoning Officer. The following information has been published on the Township's website:**

- **What is MS4?**  
**This page provides general MS4 Program information.**
- **How can I help?**  
**This page discusses ways that property owners and residents can decrease non-point source pollution and identify illicit discharges**
- **Helpful Links and Information**  
**This page provides links to EPA, DEP, the Watershed Alliance of York, Only Rain Down The Drain, The Chesapeake Conservancy, The Chesapeake Bay Foundation and the Lower Susquehanna River Keeper. Additionally, there are links to the following resources:**
  - **Homeowners Guide to Stormwater – How to develop and implement a stormwater management plan for your property.**
  - **Be Stormwater Smart**
  - **Guidelines for Maintaining Streams in Your Community**
  - **Protecting Water Quality from Urban Runoff**
  - **PA DEP Video - Stormwater Smart**
  - **Homeowner's Guide to Stormwater BMP Maintenance – What You Need to Know to Take Care of Your Property**
  - **When it Rains It Drains**
- **What is Stormwater?**  
**This page provides general information on how stormwater is created and how it is managed.**
- **Stormwater Ordinance**  
**This link directs the resident to the Township adopted stormwater management ordinance via a 3<sup>rd</sup> party site.**

- **Stormwater Assessment Fee**  
The Township has implemented a stormwater fee and this page provides information regarding the fee, its calculation, and billing.

#### BMP #4 – Distribution of Stormwater Materials

West Manheim Township will distribute stormwater educational materials and/or information to its target audiences using a variety of distribution methods, including but not limited to: displays, posters, signs, pamphlets, booklets, brochures, radio, local cable TV, newspaper articles, other advertisements (e.g., at bus and train stops/stations), bill stuffers, presentations, conferences, meetings, fact sheets, giveaways, and storm drain stenciling.

[All permittees shall select and utilize at least two distribution methods annually. These are in addition to BMP #3, above.]

#### BMP 3 & 4 Publishing Priorities 2021/2022:

- **Newsletter Articles – Published in Spring 2021 Newsletter, Fall Newsletter?**
  - Consider including topic ideas for future newsletters here as well.

Newsletters article deadlines are the Mid-February and Mid-September.

- **Social Media Posts throughout the year covering:**
  - Grass Clippings
  - Inlet Maintenance
  - Disposal of Household Hazardous Wastes
  - Illicit Discharge Detection and Elimination

The Township’s Zoning Officer updates the Township website and the social media pages.

The following brochures and flyers are available for pick up at the township building, upon request:

- Homeowners Guide to Stormwater – How to develop and implement a stormwater management plan for your property.
- Be Stormwater Smart
- Guidelines for Maintaining Streams in Your Community
- Protecting Water Quality from Urban Runoff
- PA DEP Video - Stormwater Smart
- Homeowner’s Guide to Stormwater BMP Maintenance – What You Need to Know to Take Care of Your Property
- When it Rains It Drains
- Educational Information can be found on the Township’s website:  
<https://westmanheimtwp.com/stormwater-ms4/>
- Electronic copies of all materials are saved on the Township’s

#### MCM #1 Record Keeping

As discussed earlier, audits are a normal component of MS4 Program Administration. The following items should be kept on file in both CSDatum and the MS4 Municipal Files:

- Copies of educational materials that were distributed as well as notations relative to the distribution method and a distribution list, if applicable.
- Sign-in sheets for meetings

- Screen shots of stormwater information on the Township's website



## MCM #2 – Public Involvement & Participation

West Manheim Township shall implement a public involvement and participation plan compliant with all applicable state and local public notice requirements. The plan shall be reviewed annually.

**West Manheim Township is currently creating their Public Involvement and Participation plan. The first annual review will be scheduled for the 3<sup>rd</sup> Quarter of 2022.**

### BMP#1 Develop a written Public Involvement & Participation Plan (PIPP)

Municipality shall implement and maintain a written Public Involvement and Participation Program (PIPP) which describes various types of possible participation activities and describes methods of encouraging the public's involvement and of soliciting the public's input.

The PIPP shall include, at a minimum:

(1.) Opportunities for the public to participate in the decision-making processes associated with the development, implementation, and update of programs and activities related to this General Permit.

- Public Input Opportunities:
  - Board of Supervisor's Public Meetings  
Work Session – First Tuesday  
Public Meeting- Third Thursday

(2.) Methods of routine communication to groups such as watershed associations, environmental advisory committees, and other environmental organizations that operate within proximity to the permittee's regulated small MS4s or surface waters receiving the permittee's discharges.

- **West Manheim Township is an active member of the York County Regional Stormwater Consortium.**
- **The Township routinely coordinates with the York County Conservation District regarding active construction projects and erosion and sedimentation control issues.**

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

- Once completed, a copy of the Township's Annual Status report is available for perusal at the front desk by any member of the public. The Township's first annual report is due in to DEP by **September 30<sup>th</sup> annually.**

### BMP #2 Advertise Prior to Adoption

West Manheim Township shall advertise to the public and solicit public input on the following documents prior to adoption or submission to DEP:

- Stormwater Management Ordinance
- Pollutant Reduction Plan (PRP). See PAG-13 Appendix D&E for specific PRP requirements.

Each modification or whole sale update to a document will trigger the Municipality to:

- Provide notice to the public
- Provide opportunities for public comment
- Document and evaluate the public comments
- Document the Municipality’s responses to the comments prior to finalizing the documents.
- The permittee shall provide this documentation to DEP upon request.

West Manheim Township follows all applicable rules and regulations concerning public notice and advertisement. **The Township has updated and adopted a stormwater management ordinance to be consistent with the DEP 2022 Model Ordinance.**

### BMP#3- Regular Solicitation of Public Involvement

West Manheim Township will regularly solicit public involvement and participation from its target audience groups using the following:

- Public Meeting - Municipality will conduct one (1) public meeting per permit cycle. The public meeting must:
  - Provide a summary of progress, activities, and accomplishments with implementation of the SWMP with opportunities for the public to provide feedback and input.
  - The presentation can be made at specific MS4 events or during any other public meeting. Existing permittees shall conduct at least one public meeting that includes information on SWMP implementation within five (5) years following approval of the General Permit.

**West Manheim Township conducted this public meeting during the 2022/2023 Permit Year.**

- Collaboration – Municipality will document and report instances of:
  - Cooperation and participation in MS4 activities
  - Presentations the permittee made to local watershed organizations and conservation organizations
  - Similar instances of participation or coordination with organizations in the community.

**West Manheim Township routinely collaborates with:**

- **The York County Stormwater Consortium – Staff regularly attendance at Consortium meetings**
- **The Watershed Alliance of York – links to the organization’s website are posted on the Township’s website.**
- Municipality will document and report activities in which members of the public assisted or participated in the meetings and in the implementation of the

SWMP, including education activities or organized implementation efforts such as cleanups, monitoring, storm drain stenciling, or others.

**IDD&E Complaints are tracked by the Municipality. The Municipality will also track the number of individuals participating in involvement opportunities throughout the Permit Cycle. This information will be included in the Municipality's Annual Status Report to DEP due in on September 30<sup>th</sup>. Resident-facing staff in the lobby are familiar with the IDD&E reporting process and keep copies of the DEP template IDD&E Complaint Form. When complaints are reported the IDDE form is given to the Code Enforcement Officer for immediate investigation, during times of sickness or leave the alternate investigator is the Zoning Officer.**





## MCM #3 – Illicit Discharge Detection & Elimination (IDD&E)

West Manheim Township shall develop, implement, and enforce a program to detect and eliminate illicit discharges into the permittee's regulated small MS4. This MCM shall be reviewed annually. The next review is scheduled for March of 2021.

West Manheim Township uses a software program called CS Datum to track inspections and for mapping of the MS4. CSDatum can be used by any Township employee. Please contact the system administrator if you need a username and password.

CSDatum can be accessed at [www.csdatum.com](http://www.csdatum.com) and using your login credentials. To view the Township's outfalls, select Map from the left side drop down menu. Select and turn on the stormwater system layer. Select outfalls.

This search will turn up only outfalls that match DEP's current definition of an outfall:

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

## BMP #1 – Develop and Implement a written IDD&E Program

For new permittees, the IDD&E program shall be developed during the first year of coverage under this General Permit and shall be implemented and evaluated each year thereafter.

### IDD&E Program - General Requirements

1. Procedures for identifying priority areas. These are areas with a higher likelihood of illicit discharges, illicit connections or illegal dumping. Priority areas may include areas with older infrastructure, a concentration of high-risk activities, or past history of water pollution problems.

Priority inspection areas can include, but, are not limited to:

- Outfalls with active construction sites within their watershed
- Outfalls with commercial and industrial sites within their watershed
- Outfalls with on-lot septic systems in their watershed
- Outfalls with previously known illicit discharges

**There are a total of 59 outfalls in the Township and 46 of which are located in the urbanized area.**

**There are no priority outfalls identified at this time.**

2. Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.

**Outfall Screening - The Township utilizes the CSD Illicit Discharge Field Inspection Guide, for screening procedures which designated the proper times to perform inspections. The standard DEP Outfall Reconnaissance Inventory/Sample Collection Field Sheet is utilized for inspections.**

3. Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.

**The Township follows the IDDE Manual, Chapter 7 protocol for information and techniques on how to search for IDDE problems in the field. The Township Public Works Superintendent is trained in IDDE and is responsible for supplying the Chapter 7 protocol to the personnel trained to conduct screenings.**

4. Procedures for eliminating an illicit discharge. This protocol of the IDDE Manual will be followed **The Township follows the IDDE Manual, Chapter 8 protocol for information and techniques on how to eliminate illicit discharges in the field. The Township Public Works Superintendent is responsible for supplying the Chapter 8 protocol to the personnel trained to conduct screenings.**

5. Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.

**The Township's SEO Doug Stambaugh of Hanover Group is the Township's contracted 3<sup>rd</sup> party SEO. On-lot disposal systems (OLDS) are inspected on a four-year rotation.**

6. Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges. **O&M agreements will be executed and recorded with all new Subdivision, LD, and SWM Site Plans. O&M Agreements are tracked and recorded by the Township secretary, however, this process is expected to be modified during 2022 as the Township secretary is retiring and those responsibilities will transfer to the Township Zoning Officer.**

7. Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.

**The Township performs their own illicit discharge inspections and provides a copy to the Township Engineer to be submitted with the annual reports. After the report is submitted to DEP, the Engineer provides a copy of the report back to the Township and includes a summary memo of the report's contents. The report and memo are provided to the Township Supervisors with the Township Engineer available to answer any questions that they may have.**

8. Procedures for addressing information or complaints received from the public.

**IDDE Complaints received by the public are sent for follow up and tracking to the Township's Code Enforcement Officer and to the Zoning Officer as an alternate, when necessary.**

## BMP #2 – MS4 Map – Outfalls

For new permittees, the map must be developed and submitted to DEP as an attachment to an annual MS4 Status Report by September 30, 2022 or **the fourth (4<sup>th</sup>) Annual MS4 Status Report following approval of coverage under this General Permit**, whichever is later.

The Township's Outfalls are mapped and the information is stored in a GIS Database called CSDatum. Township Employees should speak with their IT Administrator to gain access to the system. The Township Engineer is available to provide training for new and current users.

## BMP #3 – MS4 Collection System Map

In conjunction with the same map created under BMP#2 (either on the same map or on a different map), the permittee shall develop and maintain maps that show the entire storm sewer collection system, including: roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer system.

Currently the Township has the following identified in CS Datum:

- 121,125 LF Stormwater Pipe
- 83,000 LF Swale
- 1,264 Inlets
- 98 BMPs
- 67 Manholes
- 59 Outfalls (46 are within the MS4 jurisdiction)

## BMP #4 – Dry weather Outfall Screening

For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following approval of coverage under this General Permit.

The permittee shall conduct dry weather screenings of its MS4 outfalls to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. The permittee shall immediately report to DEP illicit discharges that would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, in accordance with Part A III.D.4 of this General Permit.

The Township's screening priorities are identified below:

- 1) Existing Permittees shall ensure that each outfall has a dry-weather inspection, at least once, during the permit cycle.
- 2) Observed Discharge – if a discharge is observed from any outfall during dry weather screenings, the discharge shall be inspected for color, odor, floating solids, scum, sheen, and substances that result in observed deposits in the surface waters. In addition, the discharge cannot contain substances that result in deposits in the receiving water or produce an observable change in the color, odor or turbidity of the receiving water. If the discharge exhibits any of the above

characteristics, or contains any other pollutants or causes an observed change in the surface waters, the permittee shall sample the discharge(s) for field and/or laboratory analysis *if* one or more common IDD&E parameters in order to determine if the dry weather flow is illicit.

If there is a discharge with no discernable substances, then a sample is not necessary.

### 3) Outfall Inspections

All outfall inspections must use the MS4 Outfall Field Screening Report form (3800-FM-BCW0521). The date, time, weather conditions, and observations must be marked on the form, regardless of the presence of a dry-weather flow. If there is an IDDE issue discovered, the subsequent resolution of the issue must be addressed in the Annual Status Report to DEP. Inspections should also ensure that proper O&M is being followed. Should the location of an outfall prevent safe screening an observation point should be identified that is upstream in a safe location.

Inspection Next Steps:

- A copy of the signed inspection form with photographs should be filed in the appropriate file location and then saved in to CSDatum.
- If an operation and maintenance issue is identified please forward the appropriate correspondence to the ownership entity responsible for maintenance and repairs.
- If an illicit discharge is detected, please notify the County Conservation District and provide them with a copy of your screening form.

### BMP #5 – Enact Stormwater Management Ordinance

Enact a stormwater management ordinance consistent with the 2022 Model Stormwater Management Ordinance provided by DEP.

Municipal Permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance as an attachment to an Annual MS4 Status Report by September 30, 2022 or the fourth (4<sup>th</sup>) Annual MS4 Status Report following approval of coverage under this General Permit.

**The Township updated its stormwater management ordinance to be consistent with the DEP Model 2022 Ordinance during the 2021-2022 permit year.**

### BMP #6 – Provide IDD&E Educational Outreach to Target Audience

The permittee shall establish and promote a stormwater pollution reporting mechanism by the end of the first year of General Permit coverage for the public to use to notify the permittee of illicit discharges, illegal dumping or outfall pollution.

**West Manheim Township’s website contains educational information pertaining to IDD&E at <https://westmanheimtp.com/how-can-i-help/>.**



## MCM #4 – Construction Site Stormwater Runoff Control

Permittees with coverage under the PAG-13 General Permit must rely on DEP's program for issuing NPDES permits for stormwater discharges associated with construction activities to satisfy MCM #4. In addition to relying on the state NPDES permit program for stormwater discharges associated with construction activities, the permittee shall implement the BMPs identified below.

### BMP#1 – NPDES Permitting

The Permittee may not issue a building permit or other permit or final approval to those proposing or conducting earth disturbance activities requiring an NPDES permit unless the party proposing the earth disturbance has valid NPDES Permit coverage (i.e., not expired) under 25 Pa. Code Chapter 102.

**Individual plan approval checklists are used by the Township to track completion steps in the entitlement or land development approval process. Securing an approved NPDES permit is a step in the checklist which must be completed prior to plan approval by the elected officials. The elected officials will not issue conditional approvals.**

### BMP#2 – County Conservation District Coordination

A municipality or county which issues building or other permits shall notify DEP or the applicable County Conservation District within 5 days of the receipt of an application for a permit involving an earth disturbance activity consisting of one acre or more, in accordance with 25 Pa. Code S.102.42.

**West Manheim Township as a signed MOU with the York County Conservation District. The MOU was approved by the Conservation District on September 14, 2017 and approved by the Board of Supervisors via Resolution 2017-09.**

### BMP#3 – Erosion and Sedimentation Controls

Enact, implement, and enforce an ordinance or SOP to require the implementation and maintenance of E&S control BMPs, including sanctions for non-compliance, as applicable.

All Municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Ordinance as an attachment to an Annual MS4 Status Report by September 30, 2022.

**The Township has updated its stormwater management ordinance to be consistent with the DEP Model 2022 Ordinance during the 2021-2022 permit year.**





## MCM #5 – Post Construction Stormwater Management

Permittees with coverage under the PAG-13 General Permit must rely on DEP's program for issuing NPDES permits for stormwater discharges associated with construction activities to satisfy MCM #5. Additionally, the permittee shall implement the BMP's discussed below:

### BMP #1 – Post Construction Stormwater Management Ordinance

Enact, implement, and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

All Municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Ordinance as an attachment to an Annual MS4 Status Report by September 30, 2022.

**The Township updated its stormwater management ordinance to be consistent with the DEP Model 2022 Ordinance during the 2021-2022 permit year.**

### BMP #2 – Low Impact Development (LID)

Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new development and redevelopment.

**The Township updated its stormwater management ordinance to be consistent with the DEP Model 2022 Ordinance during the 2021-2022 permit year.**

### BMP #3 – BMP O&M

Ensure adequate Operation and Maintenance of all post-construction stormwater management BMPs that have been installed at development or redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale.

Permittees shall update and maintain its current inventory during the term of coverage under the General Permit (5 years).

The Permittee uses CSDatum to track the following:

- All PCSM BMPs installed to NPDES Permit Requirements since March 10, 2003.
- Exact Lat/Long Location of BMP
- Owner or responsible O&M Party
- Type and installation date of BMP
- Required Maintenance
- Actual Inspection & Maintenance Activities
- Assessment of Annual Operation and Maintenance

**The Township recently retained a staff coordinator for the MS4 Program. The process for ensuring BMP inspection and follow up is being developed during the 2021-2022 permit cycle.**



## MCM #6 – Pollution Prevention & Good Housekeeping

The Permittee is required to develop and implement an O&M program that includes a training component and has the ultimate goal of preventing and reducing pollutant runoff from operations, facilities and activities maintained and operated by the Permittee.

A critical component to the Permittee's O&M program is employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

### BMP#1 – Municipal Operations, Facilities and Activity Inventory

The Township has identified and documented all operations that are owned or operated by the township and have the potential for generating pollution in stormwater runoff to West Manheim Township waterways. This includes activities conducted by contractors for the permittee.

- West Manheim Township has 70.6-miles of local streets and alleys. The following activities are conducted:
  - winter maintenance
  - street sweeping
  - right-of-way maintenance
  - leaf collection
- West Manheim Township owns the following driveways and/or parking lots (winter maintenance/ street sweeping/ ROW maintenance):
  - Administrative Building, 2412 Baltimore Pike
  - 31 Fairview Road - Public Works
  - 1941 Baltimore Pike – Public Works
  - 245 Saint Bartholomew Road - Township Park
- Maintenance and Storage Yards
  - 31 Fairview Road
    - Vehicle Storage
    - Salt and Solvent storage
  - 1941 Baltimore Pike
    - Stock Pile and outdoor storage of maintenance materials and debris
    - Equipment storage (bucket truck, sweeper, roller, and mowers)
    - Equipment Washing is conducted on gravel
- Parks (lawn/grounds care, building maintenance)
  - 2412 Baltimore Pike
  - 245 Saint Bartholomew Road
  - Garret Road (1/4 acre grass strip maintained by Twp.)
- Maintenance Shop (vehicle maintenance, vehicle washing, building maintenance)
  - 1941 Baltimore Pike
- Stormwater Conveyances (cleaning, repair, maintenance)

- Stormwater inlets and pipe located in streets and rights-of-way
- Stormwater Storage Facilities (lawn/grounds care, repair, maintenance)
  - Basin - Administration Building (2412 Baltimore Pike)

### BMP #2 - Develop & Implement an Operation & Maintenance Program

Manchester Township has developed and implement a written O&M program for all operations that could contribute to the discharge of pollutants from the Township, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within Manchester Township. The written O&M program stresses pollution prevention and good housekeeping measures, and contains site specific information pertaining to:

- Management practices, policies, and procedures to reduce or prevent the discharge of pollutants.
- Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the regulated small MS4s.
- Controls for reducing or eliminating the discharge of pollutants from Township owned properties, especially with regards to the Township's anti-skid materials.
- Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.

**The Township O&M Program Manual has been published under separate cover.**

### BMP #3 - Employee Training Program

Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The Employee Training Program is reviewed annually.

1. The following municipal employees shall receive training on MS4 policies and procedures:
  - Township Manager
  - Township Secretary
  - Zoning Officer
  - Township Public Works Director
  - Public Works Employees
  - Elected & Appointed Officials
2. Training topics shall include:
  - General MS4
  - Stormwater Management
  - IDD&E
  - BMP Inspections

The PA Clean Water Academy is an online training resource developed by the PA Department of Environment Protection (DEP) <https://pacleanwateracademy.remote-learner.net/>.

No login information is required to access the training. The following training courses are appropriate for Employees and Municipal Officials:

- Urban Stormwater Basics 1
- Urban Stormwater Basics 2
- Urban Stormwater Basics 3
- Urban Stormwater Basics 4
- Part I – MCMs
- Part 2 – MCMs
- MCM 3: Outfall Inspections



## Pollutant Control Measures and Pollutant Reduction Plans

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

The pertinent information from DEP’s MS4 Requirements Table is identified below:

WEST MANCHESTER TWP	PAG133655	No		Little Conewago Creek	Appendix E-Siltation (5)	Water/Flow Variability (4c)
				Honey Run	Appendix E-Siltation (5)	Water/Flow Variability (4c)
				Willis Run		Other Habitat Alterations, Water/Flow Variability (4c)
				Chesapeake Bay Nutrients/Sediment	Appendix D-Nutrients, Siltation (4a)	
				Codorus Creek	Appendix E-Excessive Algal Growth, Siltation (5)	Other Habitat Alterations, Water/Flow Variability (4c), Unknown Toxicity (5)

The PCMs identified in Appendices A, B, and C do not apply to West Manheim Township.

The Township is a participating member in the York County Regional Stormwater Consortium. The consortium has completed a joint plan which addresses PCMs contained in Appendices D and E.

The Regional Pollutant Reduction Plan is available for download on CSDatum and the Township’s website.