

Chippewa Township Pollution Reduction Plan



Chippewa Township
Beaver County, PA

May 2021

Chippewa Township
Pollution Reduction Plan

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List of Acronyms

BMP	Best Management Practices
CBW	Chesapeake Bay Watershed
CWA	Clean Water Act
DO	Dissolved Oxygen
GIS	Geographic Information System
HUC	Hydrologic Unit Code
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
O&M	Operations and Maintenance
PADEP	Pennsylvania Department of Environmental Protection
PennDOT	Pennsylvania Department of Transportation
POTW	Publicly Owned Treatment Works
PRP	Pollution Reduction Plan
ROW	Rights-of-way
SOP	Standard Operating Procedure
TMDL	Total Maximum Daily Load
TN	Total Nitrogen
TP	Total Phosphorous
TSS	Total Suspended Solids
UA	Urbanized Area

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Definitions

Term	Definition
Best Management Practices (BMP)	Schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce pollutant loading to surface waters of the Commonwealth.
Buffer (Vegetated)	A permanent strip of dense perennial vegetation established parallel to the contours of and perpendicular to the dominant slope of the field for purposes that include slowing water runoff, enhancing water infiltration and minimizing risk of any potential pollutants from leaving the field and reaching surface waters.
Intermittent Stream	A body of water flowing in a channel or bed composed primarily of substrates associated with flowing water, which, during period of the year, is below the local water table and obtain its flow from both surface runoff and groundwater discharges.
Loading Capacity	The greatest amount of loading that a surface water can receive without violating a water quality standard.
Municipal Separate Storm Sewer System (MS4)	A separate storm sewer (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels or storm drains) which is all of the following: <ol style="list-style-type: none"> (1) Owned or operated by a state, city, town, borough, county district association of other public body (created by or under State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or a designated and approved management agency under Section 208 of the Federal Act (33 U.S.C.A. 1288) that discharges surface waters of this Commonwealth (2) Designed or used for collecting or conveying stormwater (3) Not a combined sewer (4) Not part of a Publicly Owned Treatment Works (POTW)
Perennial Stream	A body of water flowing in a channel of bed composed primarily of substrates associated with flowing waters and capable, in the absence of pollution or other manmade stream disturbances, of supporting benthic macroinvertebrate community which is composed of two or more recognizable taxonomic groups of organisms which are large enough to be seen by the unaided eye and can be retained by a United States Standard No. 30 sieve and live at least part of their life cycles within or upon available surfaces in a body of water or water transport system.
Separate Storm Sewer	A conveyance or system of conveyances including pipes, conduits, ditches, and channels, primarily used for collecting and conveying stormwater runoff.
Storm Sewershed	The land area which drains to the municipal separate storm sewer system from within the jurisdiction of the MS4 permittee.

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Term	Definition
Stormwater	Runoff from precipitation, snow melt runoff and surface runoff and drainage.
Surface Waters	Perennial and intermittent streams, rivers, lakes, reservoirs, ponds, wetlands, springs, natural seeps, and estuaries, excluding water at facilities approved for wastewater treatment such as wastewater treatment impoundments, cooling water ponds and constructed wetlands used as part of a wastewater treatment process.

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1.0 Introduction

Chippewa Township, located in Beaver County, Pennsylvania, has a total area of 15.7 square miles (approximately 10,042 acres), all of it land, according to the 2010 United States Census Bureau. The 2010 Census also identifies a total Township population of 7,620. The Township is nearly entirely developed community containing primarily residential and commercial development.

It shares municipal borders with Big Beaver Borough to the north, West Mayfield Borough to the northeast, White Township to the east, Patterson Township to the southeast, Brighton Township to the south, South Beaver Township to the west, and a very small border with Darlington Township to the northwest. (see **Figure 1**, Location Map).

MS4 Regulated Area

Chippewa Township is permitted under the Pennsylvania Department of Environmental Protection (PADEP) National Pollution Discharge Elimination System (NPDES) Individual Permit PAG136106 for stormwater discharges from small municipal separate storm sewer systems (MS4). MS4 applies only to urban runoff that flows through municipally owned and operated stormwater infrastructure with an outfall to a surface water. The urbanized area (UA) is the portion of the municipality that is located within the UA boundaries defined by the 2010 US Census. Approximately 77% of Chippewa Township is classified as an UA and represents the regulated area, approximately 4,409 acres.

The MS4 consists of municipally owned and operated stormwater conveyance network including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains. (see **Figure 2**, MS4 Regulated Map).

Applicable Surface Waters and Pollutants of Concern

According to PADEP's *Pollutant Aggregation Suggestions for MS4 Requirements Table*), Chippewa Township must develop, implement and enforce a pollution reduction plan (PRP) to address "Appendix E" (Impaired Water Sediment/Nutrient) because the Township discharges to local surface watersheds listed as having an impairment cause by siltation (surrogate name for sediment). **Table 1** provides a list of impaired streams within Chippewa Township and the causes of impairment. The intent of this PRP is to establish the existing loading of pollutants discharging from the MS4 to the impaired streams and to present a plan to reduce these pollutants.

Table 1
Impaired Streams & Minimum Pollutant Reduction Required

Stream Number	Stream Name	Cause of Impairment	Minimum Reduction Required
1	Walnut Bottom Run	Siltation	10% TSS
2	Brady Run	Siltation	10% TSS

PADEP Pollutant Aggregation Suggestions for MS4 Requirements Table (Municipal) Revised 11/18/2019.

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This PRP does not include control measures for Total Maximum Daily Load (TMDL) requirements.

This PRP has been prepared in accordance with guidelines and requirements of the Individual Permit under the NPDES for stormwater discharges for MS4, specifically in accordance with the MS4 Requirements Table. The provisions of the PRP Instructions document (3800-PM-BCW0100k revised March 2017) and is comprised of the following elements:

- Section A – Public Participation
- Section B – Maps
- Section C – Pollutants of Concern
- Section D – Existing Load for Pollutants of Concern
- Section E – Best Management Practices (BMPs) selected to Achieve the Minimum Required Reductions in Pollutant Loading
- Section F – Funding Mechanism Identification
- Section G – Responsible Parties for Operation and Maintenance (O&M) of BMPs

The intent of this PRP is to establish the existing loading of pollutants discharging from the MS4 to the surface waters identified in **Table 1** and present a plan to reduce these pollutants.

This PRP may be evaluated by Chippewa Township at any time for its effectiveness in reducing pollutant loads from its stormwater discharges. If Chippewa Township believes this PRP should be revised or BMPs updated, the township will work with PADEP for review and approval of any revisions and/or updates.

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2.0 Pollution Reduction Plan Elements

2.1 Section A - Public Participation

Public participation is an essential part of the PRP because it enhances buy-in from landowners that may have an impact on pollutant discharges. It can uncover missing elements or errors in calculations and builds cooperative partnerships among the municipality and other local entities.

**Table 2
Public Participation Measures**

Public Participation Measure		Date Completed
Make a complete copy of the PRP available for public review		October 12, 2020
Publish, in a newspaper or general circulation in the area, a public notice containing a statement describing the plan, where it may be reviewed by the public, and the length of time the Township will provide for the receipt of comments.		
Accept written comments for a minimum of 30 days from the date of public notice.	The PRP was included in the agenda of the Chippewa Township Board of Supervisors Meeting for public comment located at Chippewa Township Municipal Building 2811 Darlington Road, Beaver Falls, PA 15010.	November 18, 2020
Accept written comments from any interested member of the public at a public meeting or hearing, which may include a regularly scheduled meeting of the governing body of the municipality or municipal authority.		
Consider and make a record of the consideration of each timely comment, received from the public during the public comment period concerning the plan, identifying any changes made to the plan in response to the comment.	No comments were received from the general public.	November 18, 2020

Chippewa Township has completed the above-listed public participation measures. Documentation is provided in **Attachment A**.

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2.2 Section B - Maps

Comprehensive mapping of the Townships regulated MS4 was completed as part of compliance with Minimum Control Measure (MCM) 3. The Chippewa Township MS4 figures serve the following purposes:

1. Inventory of the existing Chippewa Township stormwater conveyance network
2. Delineation of the components required by regulation, including:
 - a. Land uses and/or impervious and pervious surfaces
 - b. Outfalls (see **Figure 2**)
 - c. Storm sewershed boundaries (**Figure 3**)
 - d. Planning areas, which includes all storm sewershed boundaries (see **Figure 3**)
 - e. Location of proposed BMPs that will be implemented to achieve the required pollutant load reductions (see **Figure 4 – Brady Run and Figure 5 – Walnut Bottom Run**)
3. Framework for documenting maintenance practices and Illicit Discharge Detection and Elimination (IDD&E) activities
4. Location of proposed pollutant reduction projects

Areas not collected or conveyed by the Townships regulated MS4 are not included in the planning area and appear as non-shaded areas on the MS4 Map.

Planning Areas

PRP Planning Area, displays the regulated PRP Planning Area, which includes the Beaver River – Ohio River and Brady Run Hydrologic Unit Code (HUC) 12 watersheds, which contain sediment impaired streams.

The planning area is defined as the area used to calculate existing loads and plan load reductions. PADEP offered several options for how to define the planning area for each impaired water. The options vary from using a combination of the storm sewersheds to using watershed boundaries. Chippewa Township plans to utilize the storm sewersheds as its planning area

The total UA for Chippewa Township is approximately 4,409 acres. The PRP Planning Area from two (2) impaired watersheds, Brady Run and Walnut Bottom Run, was calculated to be approximately 135.13 acres.

The following table (**Table 3, Storm Sewershed – PRP Planning Area**) includes a list of outfalls and the associated storm sewershed acreage that drain to each outfall within each impaired watershed. This total acreage is identified as the PRP Planning Area.

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Table 3
Storm Sewershed - PRP Planning Areas

Stream Number	Watershed	Outfall #	Location	Total Watershed (acres)	Total Drainage Area PRP Planning Area (acres)
1	Brady Run	100	118 Emmet Dr		6.09
		101	Emmet Dr		14.85
		102	158 McLanahan Dr		13.22
		103	129 McLanahan Dr		0.67
		104	160 Howley Ave		2.67
		105	180 Howley Ave		1.05
		107	147 Thorndale Dr		13.21
		108	236 Center St		11.22
		109	139 Woodland Rd		3.61
		110			30.58
		111	113 Turnpike Ave		2.80
		BR-1	Nippert		16.24
				584	116.21
2	Walnut Bottom Run	500	118 Skyline		2.41
		501	132 Linden St		0.93
		502	133 Creighton St		2.84
		503	123 Mervis Dr		2.63
		504	153 Thompson Rd		4.54
		505	151 Charmont Ave		3.89
		506	Klein Street		1.68
Total Area:				1,323	135.13

Figure 3 identifies the PRP Planning Area, including the storm sewershed boundaries.

Parsed Areas

Parsed is defined as a process in which land area is removed from the Planned Area in order to calculate the actual or target pollutant load that are applicable to a MS4.

Parsing provides an opportunity for Chippewa Township to eliminate areas within the storm sewershed that do not drain to the MS4 and areas that are already covered by a NPDES permit (i.e., not a waiver or no exposure certificate) for the control of stormwater. Land areas that are parsed include the following:

- The land area associated with non-municipal stormwater NPDES permit coverage that exists within the UA of a municipality
- Land area associated with PennDOT roadways and the Pennsylvania Turnpike (roads and right of ways)
- Land areas in which stormwater runoff does not enter the MS4

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Because Chippewa Township has developed an accurate storm sewershed database system, the urbanized area has already been parsed and the items identified above have already been parsed out.

2.3 Section C: Pollutants of Concern

Pollutants of concern within the overall PRP Planning Area is sediment. PADEP established pollutant removal targets, see **Table 1**.

Table 4 identifies each of the impaired waters receiving discharges from the Township, and the pollutant(s) that are of concern to that stream.

**Table 4
PADEP MS4 Requirements Table (last revised 11/18/19)**

MS4 Name	Permit Number	Watershed	Impaired Downstream Waters or Applicable TMDL Name	Pollutant(s) of Concern
Chippewa Township	PAI136106	Beaver River-Ohio River, Brady Run	Brady Run, Walnut Bottom Run	Appendix E - Siltation

Per the PADEP MS4 Requirements Table, provided as **Attachment B**, Chippewa Township has two (2) existing streams with identified impairments, Brady Run and Walnut Bottom Run from the Beaver River – Ohio River watershed. Both streams are impaired by siltation, surrogate name for sediment, also known as Total sediment/siltation (TSS).

EPA defines sediment as *‘the loose sand, clay, silt, and other soil particles that settle at the bottom of a body of water. Sediment can come from soil erosion or from the decomposition of plant and animals.* Sediment is a pollution concern due to its degradation of water quality, which impacts sources of drinking water; increases water turbidity (cloudiness) causing impacts to aquatic habitat and fish health; and alters the depth and direction of drainage areas which can result in flooding issues.

The Township’s MS4 does not discharge directly, or within 5-miles to surface waters impaired for nutrients. As such, this PRP addressed only sediment as a pollutant of concern.

Chippewa Township is required to reduce the amount of sediment discharge by 10% and select Best Management Practices (BMP) best suited to reduce the pollution loading. The PRP will demonstrate that the selected BMPs will achieve the minimum reductions required by PADEP.

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2.4 Section D - Existing Loading Calculations for Pollutants of Concern

Based on a review of *PADEP Pollutant Aggregation Suggestions for MS4 Municipal Requirement Table*, each watershed identified with a sediment impairment is a tributary to Brady Run and Walnut Bottom Run. As such, existing pollutant loadings have been aggregated to identify the Townships total loading to be reduced.

While there are several possible methods to estimate existing loading rates for pollutants of concern, *PADEP Simplified Method* was used for calculating existing loading totals for each watershed within the PRP Planning Area. This method determines the percent impervious and pervious areas within the UA of the storm sewershed and calculate existing loading by multiplying the developed impervious and developed pervious land area (acres) by pollutant loading rates (lbs/acres/yr), provided in **Table 5**.

**Table 5
Developed Land Loading Rates for PA Counties**

Pollutant Loading Factors	Sediment Loading Rate (lbs/acre/yr)
Impervious Cover	1,839
Pervious Cover	264.96
Non-Urbanized Area	234.60

All MS4's must use the BMP effectiveness values contained with PADEP's BMP Effectiveness Values Document (3800-PM-BCW0100m), provided in **Attachment C** or Chesapeake Bay Program expert panel reports for BMPs listed in those resources when determining pollutant load reductions in PRPs, except as otherwise approved by PADEP.

Following determination of impervious and pervious cover for each storm sewershed, pollutant loads were applied based on the values presented in *Attachment B of the PADEP PRP Instructions*. Developed Land Loading Rates for PA Counties. As Chippewa Township is located in Beaver County, loadings listed for "All Other Counties" were used as noted in the following table.

**Table 6
Sediment Loading (TSS) Calculations using PADEP Simplified Method**

Watershed Name	Sewershed Drainage Area (acres)	Impairment Cause	Percent Pervious (%)	Percent Impervious (%)	Sediment Loading Rate – Pervious Area (lbs/ac/yr)	Sediment Loading Rate – Impervious Area (lbs/ac/yr)	Total Existing Sediment Load (lbs/yr)
Brady Run	116.2	Siltation	79	21	264.96	1,839	69,204
Walnut Bottom Run	18.9	Siltation	79	21	264.96	1,839	11,267
Totals							80,471
10% Sediment Reduction Requirement							8,047

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Table 6 provides a complete tabulation of the storm sewershed associated with each regulated MS4 Outfall including land cover composition, impervious and pervious area acreages and the calculated existing annual sediment loading. The percent pervious and impervious areas per watershed are determined based on various sources of information such as Google Images, field survey maps, Chippewa Township topographic map, etc.

The total existing sediment loading from the Planning Area for Chippewa Township’s regulated MS4 is **80,471** pounds per year.

2.5 Section E - BMPs Selected to Achieve the Minimum Required Reductions in Pollutant Loading

The proposed implementation of BMPs within the PRP Planning Area will result in meeting the minimum required reductions in pollutant loading within the Planning Area. A reduction of 10% of the existing sediment loading is required. Based on an existing loading of **80,471** pounds per year as noted in Section 2.4, the Township minimum pollutant reduction is **8,047** pounds per year. The Township will implement BMPs during the five-year permit period to achieve the required 10% reduction of the existing sediment loading.

A combination of infiltration basins, bioretention/raingardens, urban stream restoration and street sweeping BMP practices are considered in reducing the existing pollutant load. The names, descriptions of BMPs and land uses reported in the PRP are in accordance with the Chesapeake Bay Program Model. Opportunities for BMP installation vary across the municipality, and for that reason MS4s with multiple PRP obligations are not required to propose BMPs to address each impairment listed in the Table during the permit term. The existing loading is calculated for the entire PRP Planning Area which drains to impaired waters.

BMP’s to be considered:

Structural BMP’s	Non-Structural BMP’s
Floodplain restoration	Protect sensitive and value resources (i.e., protect, utilize natural flow pathways)
Pervious Pavement with infiltration bed	Cluster and concentrate
Infiltration basin	Minimize disturbance and minimize maintenance
Bioretention/Raingardens	Reduce impervious cover (i.e. reduce street imperviousness)
Vegetated Swales	Disconnect, distribute, decentralize
Wet Ponds	Source control (i.e. street sweeping)
Dry Well/Seepage Pit	
Infiltration Berm and Retentive Grading	

Structural BMP’s are engineered systems that are designed to mitigate impacts of stormwater. Non-structural BMP’s focus on the prevention of stormwater generation, therefore effectively reducing runoff volume and decreasing development costs while increasing property value and marketability.

As part of the Townships annual cleaning and maintenance practices for streets, sweeping has been used to remove sediment, debris and other potential sources of pollution affecting the streams.

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This practice is well suited for urban environments with little land available for the installation of structural controls.

Summary of Selection of BMPs

The township evaluated several stormwater BMP projects considering the following criteria:

- Sediment restrictions
- Cost per pound of pollutant reduction
- Ownership (public versus private land)
- Funding and Workforce availability
- Community benefit (site accessibility, visibility to the public, ability of public to experience benefits)
- Connectivity to other completed or proposed stormwater BMPs
- Timeframe to implement

Pollution Reduction Calculations/Drainage Area Analysis

The primary impairment is sediment/siltation (TSS) which requires a minimum of 10% reduction. The minimum required load reduction of sediment for both impaired streams is **8,047.11** pounds per year.

The township is proposing to install a raingarden in the Brady Run watershed and a bioretention pond in the Walnut Bottom Run watershed; and also continue street sweeping as BMPs with a goal of capturing and infiltrating the runoff generated from the MS4 drainage areas. No computer models were used to determine the pollutant loading calculations. PADEPs Simplified Method is used for determining existing pollutant loading calculations. Chippewa Township is required to implement this plan over the next five (5) years.

The detailed pollution reduction loading calculations are included in **Attachment D** of this report.

A summary of the BMPs proposed at each of the watersheds for achieving the required pollutant reduction are shown below:

Street Sweeping

Street sweeping township roadways includes a regenerative air sweeper. Street sweeping is conducted by the Road Department throughout the year. Most street sweeping occurs during the fall, spring and summer months on a weekly basis or more if needed. The sweeping equipment is stored at the Road Department Maintenance Garage when not in use. The calculation of pollutant reduction associated with street sweeping activities utilized methodology noted in the Chesapeake Bay Recommendation of the Expert.

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Bioretention/Raingardens

Raingardens and bioretention ponds are structural BMPs targeted toward capturing and treating stormwater runoff. These BMPs consist of a planted impoundment area for stormwater to collect and an underlying soil media mix and stone bed to promote evapotranspiration and infiltration which in turn improve water quality. The ponding depth within the impoundment areas of raingardens typically is limited to 12” to provide rapid draw down within 72 hours for safety since these facilities are typically located closer to areas of pedestrian and vehicular traffic circulation. Bioretention ponds are similar to raingardens but typically are further removed from pedestrian and vehicular traffic and as such will accommodate deeper ponding depths that will allow for peak rate control of stormwater runoff as well as the infiltration and water quality treatment.

PADEP reports that these BMPs will have a pollutant removal efficiency of 55 to 90% for sediments.

The Chippewa Township storm sewersheds/PRP Planning Area requires a 10% reduction in siltation (sediment). **Table 7** provides a summary of the proposed BMPs under consideration, including BMP ID (as indicated on the respective watershed maps – **Figures 4 and 5**), location, type, area treated, and sediment removed.

**Table 7
Summary of Proposed BMPs**

BMP ID	BMP Location	BMP Type	Area Treated by BMP (acres)	Sediment Removed by BMP (lbs/yr)
Brady Run				
	Brady’s Run	Street Sweeping	116.21	6,270
BR-1	Nippert Drive	Raingarden	0.75	638
Total Proposed Load Reduction (lbs/yr)				6,908
Walnut Bottom Run				
	Walnut Bottom Run	Street Sweeping	18.92	1,021
WBR-1	Near Pump Station	Bioretention Pond	0.50	425
Total Proposed Load Reduction (lbs/yr)				1,446

As provided in **Table 6**, the sediment load required to be reduced after proposed BMPs are implemented for Chippewa Township storm sewersheds/PRP Planning Area should be 8,047 lbs/yr. As demonstrated, the proposed total sediment load reduction will be 8,354 lbs/yr which meets and/or exceeds the minimum required reduction in pollutant loading.

**Table 8
Required and Proposed Sediment Reduction**

Description	Value
Chippewa Township Storm Sewershed PRP Planning Area (acres)	135 Acres
Existing Sediment Load (lbs/yr)	80,471
Minimum Required (10%) Pollutant Load Reduction (lbs/yr)	8,047
Proposed Sediment Load Reduction from BMPs (lbs/yr)	8,354

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Figures 4 and 5 shows the proposed locations of structural BMPs to be implemented for Brady's Run and Walnut Bottom Run, respectively, to achieve required pollutant load reductions.

2.6 Section F - Funding Mechanisms Identification

Prior to approving coverage, PADEP will evaluate the feasibility of implementation of an applicant's PRP. Part of this analysis includes a review of the applicants proposed method(s) by which BMPs will be funded. Applicants must identify all project sponsors and partners and probably funding sources for each BMP.

Funding sources for the proposed BMP projects outlined in this PRP include the following:

- MS4 General Fund
- MS4 Dedicated Stormwater Fund
- Bond
- Developer Cooperation
- Stormwater Utility Service Fees
- Permit Fees
- Property Taxes
- Local sponsors and partners
- MS4 Stormwater Fee, Grant Funding
- Pennsylvania Infrastructure Investment Authority (PennVest) Low-Interest Loan – offers financing for stormwater BMPs.
- Local business tax and/or Chippewa Township budget funds

The Township intends to budget costs associated with implementation of the PRP as part of their annual general fund budget, including costs associated with design, permitting, property acquisition, construction, and maintenance. Other funding considerations, including establishing a stormwater fee if statutorily permissible will be explored during this permit cycle.

2.7 Section G: Responsible Parties for Operation and Maintenance (O&M) of BMPs

Chippewa Township will be responsible for operation and maintenance (O&M) of each proposed BMP. Detailed O&M Plans will be developed with the final design of each BMP.

All stormwater BMPs installed under this PRP are subject to Chippewa Township stormwater management ordinance.

The Operation and Maintenance (O&M) activities for each BMP are included in the table below. If the BMP is located on private land, the landowner must convey an easement to the Township to allow for access for periodic inspections and maintenance, as needed. Actual O&M activities will be listed in the Annual MS4 Status Report sent to PADEP under the General Permit.

Once implemented, the BMPs must be maintained to continue producing the expected pollutant reductions. Applicants must identify the following for each selected BMP:

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- 1) The party(ies) responsible for ongoing O&M;
- 2) The activities involved with O&M for each BMP; and
- 3) The frequency at which O&M activities will occur.

The public works is generally responsible for O&M. O&M is performed through inspection checklists and standard operating procedures (SOP).

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3.0 PRP Implementation and Final Report

Under the PAG-13 General Permit, the permittee must achieve the required pollutant load reductions with five (5) years following PADEPs approval of coverage, and must submit a report demonstrating compliance with the minimum pollutant load reductions as an attachment to the first Annual MS4 Status Report that is due following completion of the 5th year of coverage.

This means that Chippewa Township is required to submit a summary report by September 30, 2023 to PADEP. This summary will review the work completed by the municipality between the years 2018 and 2023, and how they required pollution load reduction was satisfied. Report submission dates shall be verified once the municipality receives its approved coverage dates, which is listed on the PAG-13 NPDES permit.

Chippewa Township shall submit the PRP in accordance with the above requirements.