Manager's Report

Activity in the Month of September

- Permit applications, bills, deposits and bank reconciliations were handled in a timely manner. Review fee letters were mailed.
- Attended Board of Supervisors meeting, Planning Commission, Police Commission meeting and budget meeting, Authority meeting.
- Held a safety meeting.
- Attended two Schaeffer Road Bridge progress meetings.
- Mailed MS4 Annual Report.
- Continued work on annual calendar project.
- Attended Reading Area Transportation Study meeting
- Began 2019 budget
- Began Reorganization meeting work
- Set up annual volunteer lunch for December 21 from 11am to 2pm.

Respectfully Submitted,

Diane Hollenbach, Manager

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SEP 28 2018

Diane Hollenbach
Maidencreek Township Berks County
1 Quarry Road \Po Box 319
Blandon, PA 19510

Re: PRP/TMDL Plan Review Comments
Maidencreek Township MS4
NPDES Permit No. PAI133546
Authorization ID No. 1212919
Maidencreek Township, Berks County

Dear Ms. Hollenbach:

The Department of Environmental Protection (DEP) has received your individual permit application for NPDES permit coverage along with your PRP/TMDL Plan. DEP has reviewed the PRP/TMDL Plan and has the following comments and recommendations for improvement:

1. Proof or documentation that the PRP/TMDL Plan was made available for public review was not included in the plan. Please provide this documentation or evidence that the plan was made available for public review or otherwise re-publish notice of the availability of your plan, provide for a 30-day comment period, and ensure that the notice meets the minimum requirements.
2. The PRP/TMDL Plan does not provide evidence that a public meeting was held at which the plan was discussed and the public had an opportunity to provide comments. Please provide this evidence or otherwise re-publish notice of the availability of your plan, provide for a 30-day comment period, and discuss the plan during a public meeting within the comment period.
3. Portions of the UA (i.e., areas adjacent to O-053, O-050, and O-001), which appear to contain MS4 infrastructure, were not included in the Planning Area. Please provide further justification as to why these areas were not included in the Planning Area or revise mapping and loading calculations as necessary.
4. Existing BMPs were used to reduce the baseline load in the PRP. Additional information needs to be provided for each existing BMP, including: latitude and longitude coordinates; the permit number, if any, that authorized installation of the BMP; the date the BMP was installed and a statement that the BMP continues to serve the function(s) it was designed for; and the O&M activities and O&M frequencies associated with the BMP.
5. The TMDL plan states that due to the small impact Maidencreek Township (Township) may have on Lake Ontelaunee's TMDL, and because of the limited ownership and property within the MS4 tributary to the lake, the Township proposes public education and outreach as its principal BMP. Although public education and outreach is encouraged, the Township must still propose BMPs that will meet the PRP/TMDL reduction requirements during the permit term. Please provide BMPs that meet these requirements.

6. The PRP states that a riparian buffer project that began in 2011 will be used as a proposed BMP to meet the PRP reduction requirements due to the increased efficiency of the buffer as it matures. An additional activity or BMP is not being proposed; therefore, this BMP cannot be used as a proposed BMP. Ongoing operation and maintenance of an existing BMP may not be used for future credit. Alternatively, the riparian buffer project can take the full 50% reduction efficiency as an existing BMP.
7. A forest buffer is listed as an existing BMP and a proposed BMP for O-020. Credit for existing BMPs can only be used to reduce the baseline load; they cannot be used as credit towards meeting the pollutant reduction requirements.
8. The mapping shows a proposed forest buffer between O-030 and O-036, where an existing forest buffer is already located. Please refer to Comment 7.
9. A farm field located in storm sewershed O-015 is proposed to be converted to a meadow as a proposed BMP. This is a valid BMP, but the pollutant reductions for this BMP should be calculated using a different method. Undeveloped loading rates, as provided in the PRP Instructions and used in the Township's PRP calculations, should only be used for loading from land outside of the UA. Because of this, the PRP Instructions would indicate that the pervious developed loading rate would be applicable to both farm land and meadow within the UA. Please calculate the loading reduction for this BMP using a method that provides pollutant loading rates specific to this farm field and meadow to provide a more accurate reduction.
10. The TMDL Plan does not identify a long-term load reduction objective to achieve the WLA or a short-term load reduction objective (for the 5-year permit term) to achieve the WLA or reduction of 10% for sediment and/or 5% for TP. Please provide a long-term and short-term load reduction objective for the TMDL Plan.
11. Please provide proposed means of funding for the Agricultural Field Retirement/Conversion to Meadow Project, as well as any BMPs that will be implemented to meet the PRP/TMDL Plan objectives.
12. Please provide operation and maintenance (O&M) activities and frequencies for the Agricultural Field Retirement/Conversion to Meadow Project, as well as any BMPs that will be implemented to meet the PRP/TMDL Plan objectives.

Please submit the information necessary to resolve the deficiencies identified in this letter within 90 days. If your resubmission results in changes to the type or location of proposed BMPs, please note that you will be required to make those changes available to the public for review and comment prior to resubmission to DEP. In your resubmission, please include verification that the public participation process was completed.

If you have any questions, please contact me at 717.705.4918 or jrakowsky@pa.gov.

Sincerely,

Jacob S. Rakowsky, E.I.T.
Environmental Engineering Specialist
Clean Water Program

Enclosures

cc: Systems Design Engineering, Inc.