PADEP COMMENTS IN RESPONSE TO MS4 ANNUAL REPORTS SUBMITTED
FOR MS4 PERMIT YEAR 8 PERIOD OF MARCH 10, 2010 – MARCH 9, 2011

MS4 Permittee: Newtown Borough, Bucks County, PAG130057
Receipt of Year 8 Annual Report: 6-10-11
PADEP review of Y8 AR: 12-2-11

Summary: During year 8, Newtown Borough (Borough) continued to implement
activities that were related to the Borough’s MS4 permit requirements.
Based on a review of the annual report for year 8, a summary of accomplishments and
improvements is provided below, along with any questions, concerns, and areas for further
implementation and improvement of the Borough’s stormwater management program.

Review comments for year 8 annual report:

MCM #1:
Accomplishments/improvements:
• The public education plan was reviewed.
• Stormwater educational information was available to the public at Borough Hall
  and on the Borough website.
• The DEP Construction Fact Sheet was included with building permit applications.
• Stormwater information was available during public meetings and was included
  on the Borough Public Access Channel.
• Stormwater information was provided to local businesses.

Questions/concerns:
• As reported in several previous Department annual report reviews, several links
  on the stormwater page of the Borough website do not work. In addition, the
  required link to the DEP Stormwater Management Program is not present. There
  is also no narrative describing the Borough’s MS4 permit requirements.
• There are methods that can be used to try to evaluate the effectiveness of
  education and outreach activities. For the website, visits to the stormwater page
  can be tracked. Residents can be surveyed to determine their level of awareness.
  Other ideas are described in the EPA Getting in Step manual referenced in the
  Department’s last annual report review.

Areas for continued implementation/improvement:
• Continue to implement a public education and outreach program. Consider how
to evaluate the effectiveness of education and outreach efforts.
• Distribute stormwater educational information to target audiences via available
  outreach methods (e.g., website, meetings, newsletters, etc.).
• On the Borough stormwater webpage, consider adding links for Stormwater
  Discharges from MS4s, Stormwater Public Education, Stormwater Information
  for Homeowners, and Bucks County Conservation District. The Borough is
  encouraged to consider other MS4s with good stormwater website information,
such as Middletown Township, Lansdowne Borough, Chalfont Borough,
  Langhorne Manor Borough, New Britain Township, London Grove Township,
  Upper Dublin Township, Warminster Township, Horsham Township, Pennsburg
  Borough, and Doylestown Township.
For examples of stormwater information that can be included in newsletters, see
the newsletters available online from Horsham Township, Franconia Township,
East Goshen Township, West Goshen Township, London Grove Township,
Middletown Township, and Chalfont Borough.

**MCM #2:**
Accomplishments/improvements:
- The public participation plan was reviewed.
- There were public meetings for the revised Neshaminy Creek Act 167 Plan.
- The Borough EAC was involved with stormwater issues.
- The public was involved with the Old Skunky Project.

Areas for continued implementation/improvement:
- Continue to use available distribution methods (e.g., website, newsletters,
  meetings, etc.) to ensure that the public is aware of possible participation
  activities; describe/document in future annual reports what specific messages and
  methods were used to solicit public participation and involvement and what
  results were obtained.
- Refer to newsletters and websites from other MS4s provided under MCM #1 for
  public participation ideas (e.g., pollution hotline, outfall monitoring, buffer/tree
  planting, dog waste cleanup, storm drain stenciling, rain barrels, litter clean-ups,
  etc.) that could be utilized and for ways to present the ideas. Also, refer to
  information from EPA on MCM #2.

**MCM #3:**
Accomplishments/improvements:
- The storm system plan was updated.
- Educational information was distributed as described under MCM #1.

Questions/concerns:
- For BMP 12B, the annual report should indicate if the Borough was aware of any
  illicit discharges or connections to the Borough storm sewer system during the
  reporting period. If the First Student oil discharge did not enter the Borough
  storm sewer system, then it was not an MS4 incident that needed to be reported in
  the annual report.

Areas for continued implementation/improvement:
- Continue to maintain an accurate and current MS4 outfall map (that identifies
  receiving waterways) and have it available for Borough staff/responders to use as
  needed.
- Continue to be attentive and responsive to any detected or reported illicit
  discharges or connections to the municipal separate storm sewer system.
- Continue to distribute IDD&E educational information/tips to appropriate target
  audiences using available distribution methods. Refer to other MS4s listed under
  MCM #1 for examples of IDD&E educational information that can be provided to
  target audiences.
- Investigate any dry weather outfall flows that are encountered.
MCM #4:
Accomplishments/improvements:
• The Borough inspects earthmoving activities. There were no E&S problems during year 8.
• Stormwater information is included with building permit applications.
• Procedures are in place to address the control of waste at construction sites and to address public complaints.

Areas for continued implementation/improvement:
• Continue to review E&S plans and inspect earthmoving activities for compliance with Borough Codes and the MS4 permit.
• Continue to provide stormwater educational information to builders/developers.
• Continue to ensure proper waste control and to investigate any public complaints.

MCM #5:
Accomplishments/improvements:
• The Borough reviews PCSWM BMP plans and inspects sites to verify proper installation, operation, and maintenance. There were no reports of failing PCSWM BMPs during year 8.

Questions/concerns:
• The new MS4 General Permit will require the development and maintenance of a PCSWM BMP inventory. Please review the new MS4 permit to see what information will be needed in the inventory.

Areas for continued implementation/improvement:
• Continue to enforce the MCM #5 ordinance provisions as needed and provide enforcement results in the annual report.
• Continue to ensure that any PCSM BMPs are properly installed, operated and maintained; provide inventory and results in the annual report.

MCM #6:
Accomplishments/improvements:
• Contractors sweep Borough streets and clean stormwater inlets and catch basins.
• Borough vehicles are serviced outside of the Borough.

Areas for continued implementation/improvement:
• Continue to practice pollution prevention and good housekeeping measures for municipal operations with the goal of preventing or minimizing the discharge of pollutants to the municipal separate storm sewer system and to surface waters.
• Provide training opportunities for any Borough employees or contractors who interact with or may be involved with operations that may affect the municipal separate storm sewer system.