

September 25, 2019

Krista Brown  
Environmental Protection Compliance Specialist  
Pennsylvania Department of Environmental Protection  
2 East Main Street  
Norristown, PA 19401

RE: Kennett Township  
NPDES Permit No. PAG 130146 / PAI 130062  
Status Report – July 1, 2018 to June 30, 2019

Dear Ms. Brown:

On behalf of Kennett Township, enclosed please find Form 3800-FM-BCW0491 9/2017 – Annual MS4 Status Report along with appendices which describe activities for the referenced time period.

As you are aware, DEP issued a deficiency letter regarding the TMDL Plan submitted by the Township's prior engineering consultant on July 11, 2018. Since then, we have been working with DEP on revisions to the mapping. Those revisions will change the number of outfalls (MCM #3 – BMP #2) and BMPs (MCM #5 – BMP #3) previously submitted. Therefore, these two items are being left incomplete in the reporting form. Otherwise, we believe we have complied with all other aspects of the program. Please see the report appendices.

This submittal represents Kennett Township's best understanding of its requirements. Please let us know if there is anything further you need us to provide. Thank you.

Very truly yours,



David J. Athey, P.E.  
Principal Water Resources Engineer

cc: Eden Ratliff – Kennett Township  
Michael O'Brien – Kennett Township  
Roger Lysle – Kennett Township



## ANNUAL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) STATUS REPORT

FOR THE PERIOD July 1, 2018 TO JUNE 30, 2019

GENERAL INFORMATION					
Permittee Name:	Kennett Township	NPDES Permit No.:	PAG 130146 / PAI130062		
Mailing Address:	801 Burrows Run Road	Effective Date:	March 16, 2013		
City, State, Zip:	Chadds Ford, PA 19317	Expiration Date:	Under review		
MS4 Contact Person:	Eden Ratliff	Renewal Due Date:	Pending		
Title:	Township Manager	Municipality:	Kennett Township		
Phone:	610-388-1300	County:	Chester		
Email:	eden.ratliff@kennett.pa.us				
Co-Permittees (if applicable):					
Appendix(ces) that permittee is subject to (select all that apply):					
<input type="checkbox"/> Appendix A <input type="checkbox"/> Appendix B <input type="checkbox"/> Appendix C <input type="checkbox"/> Appendix D <input type="checkbox"/> Appendix E <input checked="" type="checkbox"/> Appendix F					
WATER QUALITY INFORMATION					
Are there any discharges to waters within the Chesapeake Bay Watershed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
Identify all surface waters that receive stormwater discharges from the permittee's MS4 and provide the requested information (see instructions).					
Receiving Water Name	Ch. 93 Class.	Impaired?	Cause(s)	TMDL?	WLA?
West Branch Red Clay Creek	TSF	Yes	Organic Enrichment/Low D.O., Siltation, PCB	Yes	Yes
East Branch Red Clay Creek	TSF	Yes	Organic Enrichment/Low D.O., Siltation, PCB	Yes	Yes
Bucktoe Creek	TSF	Yes	Organic Enrichment/Low D.O., Siltation	No	No
Burroughs Brook	CWF	Yes	PCB	No	No
Burrows Run	CWF	Yes	PCB	No	No
Ring Run	WWF	No		No	No
Craigs Mill Run	WWF	Yes	Siltation	No	No
Bennett's Run	WWF	No		No	No

**GENERAL MINIMUM CONTROL MEASURE (MCM) INFORMATION**

Have you completed all MCM activities required by the permit for this reporting period?  Yes  No

List the current entity responsible for implementing each MCM of your SWMP, along with contact name and phone number.

MCM	Entity Responsible	Contact Name	Phone
#1 Public Education and Outreach on Storm Water Impacts	Kennett Township	Eden Ratliff	610-388-1300
#2 Public Involvement/Participation	Kennett Township	Eden Ratliff	610-388-1300
#3 Illicit Discharge Detection and Elimination (IDD&E)	Kennett Township	Eden Ratliff	610-388-1300
#4 Construction Site Storm Water Runoff Control	Kennett Township	Eden Ratliff	610-388-1300
#5 Post-Construction Storm Water Management in New Development and Redevelopment	Kennett Township	Eden Ratliff	610-388-1300
#6 Pollution Prevention / Good Housekeeping	Kennett Township	Eden Ratliff	610-388-1300

**MCM #1 – PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS**

**BMP #1: Develop, implement and maintain a written Public Education and Outreach Program.**

1. For new permittees only, has the written PEOP been developed and implemented within the first year of permit coverage?

Yes  No

2. Date of latest annual review of PEOP: 9/19/19 Were updates made?  Yes  No

3. What were the plans and goals for public education and outreach for the reporting period?

The goal was to provide information to the public through the Township website and newsletters as well as providing information to the target audience groups. Please see Appendix 1.

4. Did the MS4 achieve its goal(s) for the PEOP during the reporting period?  Yes  No

5. Identify specific plans and goals for public education and outreach for the upcoming year:

The Township will continue to provide information to the target groups. Please see Appendix 1.

**BMP #2: Develop and maintain lists of target audience groups present within the areas served by your MS4.**

1. For new permittees only, have the target audience lists been developed and implemented within the first year of permit coverage?

Yes  No

2. Date of latest annual review of target audience lists: 9/19/19 Were updates made?  Yes  No

**BMP #3: Annually publish at least one educational item on your Stormwater Management Program.**

1. For new permittees only, were stormwater educational and informational items produced and published in print and/or on the Internet within the first year of permit coverage?

**3800-FM-BCW0491 9/2017  
Annual MS4 Status Report**

Yes  No

2. Date of latest annual review of educational materials: 9/19/19

Were updates made?  Yes  No

3. Do you have a municipal website?  Yes  No (URL:  
<https://kennett.pa.us/182/Stormwater-MS4>)

If Yes, what MS4-related material does it contain?

The following resources are available on the website and may be helpful for residents or developers: Build a Rain Barrel, Chester County Stormwater Authority MS4, Construction Runoff pamphlet, Homeowners Guide MS4, Stormwater and the Construction Industry, Stormwater Operations and Management Pamphlet, and Water Efficient Landscaping.

4. Describe any other method(s) used during the reporting period to provide information on stormwater to the public:  
Please see Appendix 1.
5. Identify specific plans for the publication of stormwater materials for the upcoming year:  
The Township will update stormwater materials as necessary in the upcoming year.

**BMP #4: Distribute stormwater educational materials to the target audiences.**

Identify the two additional methods of distributing stormwater educational materials during the previous reporting period (e.g., displays, posters, signs, pamphlets, booklets, brochures, radio, local cable TV, newspaper articles, other advertisements, bill stuffers, posters, presentations, conferences, meetings, fact sheets, giveaways, or storm drain stenciling).

Handouts are available at the Township building (bookmarks, posters, mailers, etc.) and are included in the Appendix MCM #1. Stormwater issues and information are discussed at the monthly public meetings. Semi-annual newsletters and monthly emails are sent to all residents and businesses. Stormwater informational brochures are also distributed to builders and developers when receiving their building permits.

**MCM #1 Comments:**

Please see Appendix 1.

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

**BMP #1: Develop, implement and maintain a written Public Involvement and Participation Program (PIPP)**

1. For new permittees only, was the PIPP developed and implemented within one year of permit coverage?  
 Yes  No
2. Date of latest annual review of PIPP: 9/19/19 Were updates made?  Yes  No

**BMP #2: Advertise to the public and solicit public input on ordinances, SOPs, Pollutant Reduction Plans (PRPs) (if applicable) and TMDL Plans (if applicable), including modifications thereto, prior to adoption or submission to DEP:**

1. Was an MS4-related ordinance, SOP, PRP or TMDL Plan developed during the reporting period?  Yes  No
2. If Yes, describe how you advertised the draft document(s) and how you provided opportunities for public review, input and feedback:
  
3. If an ordinance, SOP or plan was developed or amended during the reporting period, provide the following information:

Ordinance / SOP / Plan Name	Date of Public Notice	Date of Public Hearing	Date Enacted or Submitted to DEP
-----------------------------	-----------------------	------------------------	----------------------------------


**BMP #3: Regularly solicit public involvement and participation from the target audience groups using available distribution and outreach methods.**

1. At least one public meeting or other MS4 event must be held during the 5-year permit coverage period to solicit participation and feedback from target audience groups. Was this meeting or event held during the reporting period?

Yes  No      If Yes, Date of Meeting or Event:

2. Report instances of cooperation and participation in MS4 activities; presentations the permittee made to local watershed and conservation organizations; and similar instances of participation or coordination with organizations in the community.

Please see Appendix 2.

3. 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 efforts such as cleanups, monitoring, storm drain stenciling, or others.

Please see Appendix 2.

**MCM #2 Comments:**

Please see Appendix 2.

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

**BMP #1: Develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated small MS4.**

1. For new permittees only, was the written IDD&E program developed within one year of permit coverage?

Yes  No

2. Date of latest annual review of IDD&E program: 9/19/19      Were updates made?  Yes  No

**BMP #2: Develop and maintain map(s) that show permittee and urbanized area boundaries, the location of all outfalls and, if applicable, observation points, and the locations and names of all surface waters that receive discharges from those outfalls. Outfalls and observation points shall be numbered on the map(s).**

1. Have you completed a map(s) that includes all components of BMP #2?  Yes  No

If Yes and you are a new permittee and have not submitted the map(s) previously, attach the map(s) to this report.

If No, date by which permittee expects map(s) to be completed:

2. Date of last update or revision to map(s): Ongoing

3. Total No. of Outfalls in MS4: See Appendix 3      Total No. of Outfalls Mapped: See Appendix 3

4. Total No. of Observation Points: See Appendix 3      Total No. of Observation Points Mapped: See Appendix 3

5. During the reporting period, have you identified any existing outfalls that have not been previously reported to DEP in an NOI, application or annual report, or are any new MS4 outfalls proposed for the next reporting period?

Yes  No      If Yes, select:  Existing Outfall(s) Identified  New Outfall(s) Proposed

**BMP #3: In conjunction with the map(s) created under BMP #2 (either on the same map or on a different map), the permittee shall develop and maintain map(s) that show the entire storm sewer collection system within the permittee's jurisdiction that are owned or operated by the permittee (including roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system), including privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components.**

1. Have you completed a map(s) that includes all components of BMP #3?  Yes  No

If Yes and you are a new permittee and have not submitted the map(s) previously, attach the map(s) to this report.

If No, date by which permittee expects map(s) to be completed:

2. If Yes to #1, is the map(s) on the same map(s) as for outfalls and receiving waters?  Yes  No

3. Date of last update or revision to map(s): Ongoing

**BMP #4: Conduct dry weather screenings of 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.**

For new permittees, all identified outfalls (and if applicable observation points) must be screened during dry weather at least twice within the 5-year period following permit coverage. For existing permittees, all identified outfalls (and if applicable observation points) must be screen during dry weather at least once within the 5-year period following permit coverage and, for areas where past problems have been reported or known sources of dry weather flows occur on a continual basis, outfalls must be screened annually during each year of permit coverage.

1. How many unique outfalls (and if applicable observation points) were screened during the reporting period? 6

2. Indicate the percentage of all outfalls screened in the past five years. 3%

3. Indicate the percent of outfalls screened during the reporting period that revealed dry weather flows: 50%

4. Did any dry weather flows reveal color, turbidity, sheen, odor, floating or submerged solids?  Yes  No

5. If Yes for #4, attach all sample results to this report with a map identifying the sample location. Explain the corrective action(s) taken in the attachment.

6. Do you use the MS4 Outfall Field Screening Report form (3800-FM-BCW0521) provided in the permit?

Yes  No

If No, attach a copy of your screening report form.

**BMP #5: Enact a Stormwater Management Ordinance or SOP to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated small MS4.**

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that prohibits non-stormwater discharges?  Yes  No

If Yes, indicate the date of the ordinance or SOP: September 17, 2014

2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) with respect to authorized non-stormwater discharges?  Yes  No

If Yes to #2 and the ordinance or SOP has not been submitted to DEP previously, attach the ordinance or SOP.



3. Were there any violations of the ordinance or SOP during the reporting period?  Yes  No

If Yes to #3, complete the table below (attach additional sheets as necessary).

Violation Date	Nature of Violation	Responsible Party	Enforcement Taken

4. Did you approve any waiver or variance during the reporting period that allowed an exception to non-stormwater discharge provisions of an ordinance or SOP?  Yes  No

If Yes to #4, identify the entity that received the waiver or variance and the type of non-stormwater discharge approved.

**BMP #6: Provide educational outreach to public employees, business owners and employees, property owners, the general public and elected officials (i.e., target audiences) about the program to detect and eliminate illicit discharges.**

1. Was IDD&E-related information distributed to public employees, businesses, and the general public during the reporting period?  Yes  No

If Yes, what was distributed? Please see Appendix 3

2. Is there a well-publicized method for employees, businesses and the public to report stormwater pollution incidents?  
 Yes  No

3. Do you maintain documentation of all responses, action taken, and the time required to take action?  Yes  No

**MCM #3 Comments:**

Please see Appendix 3.

**MCM #4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

Are you relying on PA's statewide program for stormwater associated with construction activities to satisfy this MCM?

Yes  No

*(If Yes, respond to questions for BMP Nos. 1, 2 and 3 only in this section. If No, respond to questions for all BMPs in this section)*

**BMP #1: The permittee may not issue a building 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.**

During the reporting period, did you comply with 25 Pa. Code § 102.43 (relating to withholding building or other permits or approvals until DEP or a county conservation district (CCD) has approved NPDES permit coverage)?

Yes  No  Not Applicable (no building permit applications received)

**BMP #2: A municipality or county which issues building or other permits shall notify DEP or the applicable CCD 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 § 102.42.**

During the reporting period, did you comply with 25 Pa. Code § 102.42 (relating to notifying DEP/CCD within 5 days of receiving an application involving an earth disturbance activity of one acre or more)?

Yes  No  Not Applicable (no building permit applications received)

**BMP #3: 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.**

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that requires implementation and maintenance of E&S control BMPs?  Yes  No

If Yes, indicate the date of the ordinance or SOP: September 17, 2014

2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j)?  Yes  No

3. If Yes to #2 and the ordinance or SOP has not been submitted previously, attach a copy of the ordinance or SOP.

**BMP #4: Review Erosion and Sediment (E&S) control plans to ensure that such plans adequately consider water quality impacts and meet regulatory requirements.**

Specify the number of E&S Plans you reviewed during the reporting period:

**BMP #5: Conduct inspections regarding installation and maintenance of E&S control measures during earth disturbance activities. Maintain records of site inspections, including dates and inspection results, in accordance with the record retention requirements in this permit.**

Specify the number of E&S inspections you completed during the reporting period:

**BMP #6: Conduct enforcement when installation and maintenance of E&S control measures during earth disturbance activities does not comply with permit and/or regulatory requirements.**

Specify the number of enforcement actions you took during the reporting period for improper E&S:

**BMP #7: Develop and implement requirements for construction site operators to control waste at construction sites that may cause adverse impacts to water quality. The permittee shall provide education on these requirements to construction site operators.**

Specify the method(s) by which you are educating construction site operators on controlling waste at construction sites:

**BMP #8: Develop and implement procedures for the receipt and consideration of public inquiries, concerns, and information submitted by the public to the permittee regarding local construction activities.**

1. A tracking system has been established for receipt of public inquiries and complaints.  Yes  No

2. Specify the number of inquiries and complaints received during the reporting period:

**MCM #4 Comments:**

Please see Appendix 4.

**MCM #5 – POST-CONSTRUCTION STORM WATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT**

**BMP #1: 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.**

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that requires implementation and maintenance of post-construction stormwater management (PCSM) BMPs?  Yes  No  
If Yes, indicate the date of the ordinance or SOP: September 17, 2014
2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j)?  Yes  No
3. If Yes to #2 and the ordinance or SOP has not been submitted previously, attach a copy of the ordinance or SOP.

**BMP #2: Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new development and redevelopment. Measures should also be included to encourage retrofitting LID into existing development. Enact ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices.**

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that encourages and expands the use of LID in new development and redevelopment?  Yes  No  
If Yes, indicate the date of the ordinance or SOP: September 17, 2014
2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j)?  Yes  No
3. If Yes to #2 and the ordinance or SOP has not been submitted previously, attach a copy of the ordinance or SOP.

**BMP #3: Ensure adequate O&M 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.**

1. Do you have an inventory of all PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003?  Yes  No  
If Yes to #1, complete Table 1 on the next page.
2. Has proper O&M occurred during the reporting period for all PCSM BMPs?  Yes  No
3. If No to #2, explain what action(s) the permittee has taken or plans to take to ensure proper O&M.

*If you are relying on PA's statewide program for stormwater associated with construction activities, you may skip to MCM #6, otherwise complete all questions for BMPs #4 - #6 in this section.*

**BMP #4: 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.**

1. Specify the number of PCSM Plans reviewed during the reporting period for projects disturbing 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):
2. Has a tracking system been established and maintained to record qualifying projects and their associated BMPs?  
 Yes  No

**PCSM BMP INVENTORY**

**Table 1.** To complete the information needed for MCM #5, BMP #3, list all existing structural BMPs that discharge stormwater to the permittee's MS4 that were installed to satisfy PCSM requirements for earth disturbance activities under Chapter 102, and provide the requested information (see instructions).

BMP No.	BMP Name	DA (ac)	Entity Responsible for O&M	Latitude	Longitude	Date Installed	O&M Requirements	NPDES Permit No.
1				o ' "	o ' "			
2				o ' "	o ' "			
3				o ' "	o ' "			
4				o ' "	o ' "			
5				o ' "	o ' "			
6				o ' "	o ' "			
7								
8								
9								
10					o ' "			
11				o ' "	o ' "			
12				o ' "	o ' "			
13				o ' "	o ' "			
14				o ' "	o ' "			
15				o ' "	o ' "			
16				o ' "	o ' "			

See Appendix 5

**BMP #5: Ensure that controls are installed that shall prevent or minimize water quality impacts. The permittee shall inspect all qualifying development or redevelopment projects during the construction phase to ensure proper installation of the approved structural PCSM BMPs. A tracking system (e.g., database, spreadsheet, or written list) shall be implemented to track the inspections conducted and to track the results of the inspections (e.g., BMPs were, or were not, installed properly).**

1. During the reporting period have you inspected all qualifying development and redevelopment projects during the construction phase to ensure proper installation of approved structural BMPs?  
 Yes  No  Not Applicable (no qualifying projects during reporting period)
2. Has a tracking system been established and maintained to record results of inspections?  
 Yes  No

**BMP #6: Develop a written procedure that describes how the permittee shall address all required components of this MCM.**

Have you developed a written plan that addresses: 1) minimum requirements for use of structural and/or non-structural BMPs in plans for development and redevelopment; 2) criteria for selecting and standards for sizing stormwater BMPs; and 3) implementation of an inspection program to ensure that BMPs are properly installed?  Yes  No

**MCM #5 Comments:**

Please Appendix 5.

**MCM #6 – POLLUTION PREVENTION / GOOD HOUSEKEEPING**

**BMP #1: Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the MS4. This includes activities conducted by contractors for the permittee.**

1. Have you identified all facilities and activities owned and operated by the permittee that have the potential to generate stormwater runoff into the MS4?  Yes  No
2. When was the inventory last reviewed? 9/19/19
3. When was it last updated? 9/19/19

**BMP #2: Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated MS4.**

1. Have you developed a written O&M program for the operations identified in BMP #1?  Yes  No
2. Date of last review or update to written O&M program: 9/19/19

**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 operations to the regulated small MS4. All relevant employees and contractors shall receive training.**

1. Have you developed an employee training program?  Yes  No
2. Date of last review or update to training program: 9/19/19 Date of latest training: See below

3. Training topics covered:

Public Works staff typically meets at the beginning of each month to discuss topics including vehicle and equipment fueling, proper equipment fueling, solid waste handling, roadway, sidewalk and bridge maintenance, cold weather operations such as salting, secondary containment, and stormwater basin maintenance.

4. Name(s) of training presenter(s):

Roger Lysle - Roadmaster

5. Names of training attendees:

Public works staff

**MCM #6 Comments:**

Please see Appendix 6.

**POLLUTANT CONTROL MEASURES (PCMs)**

Indicate the status of implementing PCMs in Appendices A, B and/or C by completing the table below. Skip this section if PCMs are not applicable.

Task	Date Completed	Attached	Anticipated Completion Date
Storm Sewershed Map(s)		<input type="checkbox"/>	
Source Inventory		<input type="checkbox"/>	
Investigation of Suspected Sources		<input type="checkbox"/>	
Ordinance/SOP for Controlling Animal Wastes		<input type="checkbox"/>	

**PCM Comments:**

**POLLUTANT REDUCTION PLANS (PRPs) AND TMDL PLANS**

1. Complete this section if the development and submission of a PRP and/or TMDL Plan was required as an attachment to the latest NOI or application or was required by the permit, regardless of whether DEP has approved the plan(s).

Type of Plan	Submission Date	DEP Approval Date	Surface Waters Addressed by Plan
<input type="checkbox"/> Chesapeake Bay PRP (Appendix D)			Chesapeake Bay
<input type="checkbox"/> Impaired Waters PRP (Appendix E)			
<input checked="" type="checkbox"/> TMDL Plan (Appendix F)	September 14, 2017	-	Brandywine Creek, Red Clay Creek
<input type="checkbox"/> Combined Chesapeake Bay / Impaired Waters PRP			Chesapeake Bay,
<input type="checkbox"/> Combined PRP / TMDL Plan			

Joint Plan (if checked, list the name of the MS4 group or names of all entities participating in the joint plan below)

Joint Plan Participants:

2. Identify the pollutants of concern and pollutant load reduction requirements under the permit (see instructions).

Type of Plan	TSS Load Reduction (lbs/yr)	TP Load Reduction (lbs/yr)	TN Load Reduction (lbs/yr)
<input type="checkbox"/> Chesapeake Bay PRP (Appendix D)			
<input type="checkbox"/> Impaired Waters PRP (Appendix E)			
<input checked="" type="checkbox"/> TMDL Plan (Appendix F)	Being developed	Being developed	Being developed
<input type="checkbox"/> Combined Chesapeake Bay / Impaired Waters PRP			
<input type="checkbox"/> Combined PRP / TMDL Plan			

3. Date Final Report Demonstrating Achievement of Pollutant Load Reductions Due:

4. Have any modifications to the plan(s) occurred since DEP approval?  Yes  No

If Yes to #4, was the updated plan(s) submitted to DEP?  Yes  No

If Yes to #4, did you comply with the public participation requirements of the applicable appendix?  Yes  No

If Yes to #4, describe the plan modifications.

5. Summary of progress achieved during reporting period.

6. Anticipated activities for next reporting period.

**PRP/TMDL Plan Comments:**

**NEW BMPs FOR PRP/TMDL PLAN IMPLEMENTATION**

**Table 2.** List all new structural BMPs installed and ongoing non-structural BMPs implemented during the reporting period that are being used toward achieving load reductions in the permittee's PRP and/or TMDL Plan (see instructions).

BMP No.	BMP Name	DA (ac)	% Imp.	BMP Extent	Units	Latitude	Longitude	Date Installed or Implemented	Planning Area?	Ch. 102?	Annual Sediment Load Reduction (lbs/yr)
						o ' "	o ' "		<input type="checkbox"/>	<input type="checkbox"/>	
						o ' "	o ' "		<input type="checkbox"/>	<input type="checkbox"/>	
						o ' "	o ' "		<input type="checkbox"/>	<input type="checkbox"/>	
						o ' "	o ' "		<input type="checkbox"/>	<input type="checkbox"/>	
						o ' "	o ' "		<input type="checkbox"/>	<input type="checkbox"/>	

**BMP INVENTORY FOR PRP/TMDL PLAN IMPLEMENTATION**

**Table 3.** List all existing structural BMPs that have been installed in prior reporting periods and are eligible to use toward achieving load reductions in the permittee's PRP and/or TMDL Plan (see instructions).

BMP No.	BMP Name	DA (ac)	% Imp.	BMP Extent	Units	Latitude	Longitude	Date Installed	Annual Sediment Load Reduction (lbs/yr)	Date of Latest Inspection	Satisfactory?
						o ' "	o ' "				<input type="checkbox"/>
						o ' "	o ' "				<input type="checkbox"/>
						o ' "	o ' "				<input type="checkbox"/>
						o ' "	o ' "				<input type="checkbox"/>
						o ' "	o ' "				<input type="checkbox"/>
						o ' "	o ' "				<input type="checkbox"/>



### CERTIFICATION

**For PAG-13 Permittees:** I have read the latest PAG-13 General Permit issued by DEP and agree and certify that (1) the permittee continues to be eligible for coverage under the PAG-13 General Permit and (2) the permittee will continue to comply with the conditions of that permit, including any modifications thereto. I understand that if I do not agree to the terms and conditions of the PAG-13 General Permit, I will apply for an individual permit within 90 days of publication of the General Permit. I also acknowledge that any facility construction needed to comply with the General Permit requirements shall be designed, built, operated, and maintained in accordance with operative laws and regulations.

**For All Permittees:** I certify under penalty of law that this report was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. See 18 Pa. C.S. § 4904 (relating to unsworn falsification).

Eden Ratliff, Township Manager

Name of Responsible Official

610-388-1300

Telephone No.



Signature

9/24/19

Date

**APPENDIX 1**  
**PUBLIC EDUCATION AND OUTREACH ON STORMWATER IMPACTS**

**BMP #1: Develop, implement and maintain a written Public Education and Outreach Program.**

Kennett Township ("Township") has prepared a Public Education and Outreach Program ("Program") to address MCM#1 of the Township's Stormwater Management Plan. This Program was implemented by Township Staff and is reviewed by the Township once per calendar year and updated, if necessary.

**BMP#2: Develop and maintain lists of target audience groups present within the areas served by your MS4.**

The Township has developed a Public Education and Outreach Program which identifies target audience groups within the Township's MS4 area.

**BMP#3: Annually publish at least one educational item on your Stormwater Management Program.**

The Township publishes general stormwater educational information, a general description of the Stormwater Management Program and information relating to stormwater management activities through the following mediums:

1. Newsletter. The Township publishes a biannual newsletter (Spring/Summer & Fall/Winter issues) that includes articles with general stormwater educational information. Depending on the season, the newsletter includes relevant information pertaining to the following:
  - a. Recycling Information and Guidelines;
  - b. Outfall and Basin Inspection Notices
  - c. Hazardous Waste Events/Disposal Guidelines;
  - d. Yard Waste Reminders;
  - e. Leaf Collection Guidelines;
  - f. Public Service Announcements;

The newsletter is mailed electronically to the 1,200+ email addresses on the Townships email list. The newsletter is available for download from the Township's website at the following web address: <https://kennett.pa.us/residents/newsletters>

2. Pamphlets. The Township offers a variety of educational pamphlets pertaining to stormwater management in the lobby of the Township building. Pamphlets include the following:
  - a. "Tips to Prevent Water Pollution" published by Chester County;
  - b. "Protecting Water Quality from Urban Runoff" published by U.S. EPA;
  - c. "When it Rains, It Drains" published by PADEP;
  - d. "Storm Water Pollution Prevention Plan: A Guide for Construction Sites" published by U.S. EPA.

The Township distributes a copy of the "Don't Let Storm Water Run Off with Your Time and Money!" to developers along with any building permits issued which involve earth disturbance activities. The Township tracks the number of building permits issued which will facilitate measurement of pamphlet distribution. The Township includes the "When it Rains, It Drains" brochure in the New Resident packet that is mailed to all new residents of the Township.

3. Web Page. The Township maintains a dedicated stormwater web page on its website that contains information regarding the Township's Stormwater Management Program. The web page notes that the Township's MS4 stormwater discharge is regulated by the NPDES permitting program. The web pages provides tips on how the public can reduce stormwater runoff pollution and informational resources. Finally, the web page includes a link to the DEP Stormwater BMP Manual. The Township's website featuring stormwater management information can be accessed at the following web address: <https://www.kennett.pa.us/182/Stormwater-MS4>.

**BMP#4: Distribute stormwater educational materials to the target audiences.**

In addition to the mediums identified above, the Township also distributes educational information to target audiences through public meetings and newspaper advertisements.

1. Public Meetings. The Township will keep a recurring meeting item entitled "Public Works Projects/Updates" on the meeting agenda set for each monthly Board of Supervisors Meeting. Each month, the Director of Public Works will provide an update regarding repairs to storm sewer infrastructure, planned improvements to storm sewer infrastructure, MS4 compliance activities and yard waste collection events.
2. Newspaper. Through the Brandywine Red Clay Alliance, the Township partners with 32 other neighboring municipalities to publish advertisements which appeared in the following publications (with dates):

3/20/19 Chester County Press  
3/22/19 Daily Local News  
3/28/19 Southern Chester city Weeklies  
3/31/19 Daily Local News Digital

**APPENDIX 2**  
**PUBLIC INVOLVEMENT / PARTICIPATION**

**BMP #1: Develop, implement and maintain a written Public Involvement and Participation Program (PIPP).**

Kennett Township (Township) has prepared a Public Involvement & Participation Program (PIPP) to address MCM#2 of the Township's Stormwater Management Plan. This Program was implemented by Township Staff and is reviewed by the Township once per calendar year and updated, if necessary.

**BMP #2: Advertise to the public and solicit public input on ordinances, SOPs, Pollutant Reduction Plans (PRPs) (if applicable) and TMDL Plans (if applicable), including modifications thereto, prior to adoption or submission to DEP).**

Not applicable for the time period July 1, 2018 to June 30, 2019.

**BMP #3: Regularly solicit public involvement and participation from the target audience groups using available distribution and outreach methods.**

Question 1. Each calendar year, the Township provides a comprehensive presentation regarding the Township's Stormwater Management Program during a publicly advertised meeting. The meeting reviews the Township's obligations under the NPDES permit and report on the Township's progress, activities and accomplishments in implementing the Stormwater Management Plan. At the conclusion of the presentation, the Township provides an opportunity for attendees to offer questions and comments.

At periodic Board of Supervisor's Meetings, the Township reports on recently completed stormwater management activities as well as upcoming projects. The Township gives attendees the opportunity to make comments or ask questions relating to the Township's stormwater management activities.

Questions 2 and 3. The Township maintains its relationship and communications with the local Brandywine Red Clay Alliance organization and the Kennett Area Park Authority. Both of these organizations promote environmental interests within Kennett Township and surrounding communities. Both of these organizations provide regular activities and promote public involvement and participation for events aligned with environmental education. Furthermore, the Township continues to work with these organizations to provide assistance in continuing their organizational goals.

The Township makes of minutes from the Township's public meetings available for download through the Township Web Page. These minutes contain a summary of any discussion in public meetings pertaining to the Township's stormwater management program or related topics. The Township will make copies of recent MS4 periodic reports available upon request at the Township's offices.

**APPENDIX 3**  
**ILLCIT DISCHARGE DETECTION AND ELIMINATION (IDD&E)**

**BMP #1: Develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated small MS4.**

Kennett Township (Township) has prepared an Illicit Discharge Detection & Elimination Program (IDD&E) to address MCM#3 of the Township's Stormwater Management Plan. This Program is implemented by Township Staff and reviewed by the Township once per calendar year and updated, if necessary.

**BMP#2: Develop and maintain map(s) that show permittee and urbanized area boundaries, the location of all outfalls and, if applicable, observation points, and the locations and names of all surface waters that receive discharges from those outfalls. Outfalls and observation points shall be numbered on the map(s).**

The Township previously generated mapping of its regulated small MS4, including outfall locations and surface waters of the Commonwealth. This mapping was used as the basis for the TMDL Plan submitted to DEP on September 14, 2017. In its deficiency letter dated July 11, 2018 and discussed at a meeting involving DEP, Township officials, and AECOM on August 21, 2018, numerous revisions to this mapping were needed. Updates to this mapping are on-going and information about outfalls will be provided in the revised TMDL report and the next Status Report.

**BMP#3: In conjunction with the map(s) created under BMP #2 (either on the same map or on a different map), the permittee shall develop and maintain map(s) that show the entire storm sewer collection system within the permittee's jurisdiction that are owned or operated by the permittee (including roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system), including privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components.**

The Township has previously generated mapping of its storm sewer collection system, including all relevant physical features as well as municipal and watershed boundaries. Please see description for BMP #2 above.

**BMP#4: Conduct dry weather screenings of 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.**

The Township's prior engineering consultant did not make staff aware of their dry weather screening obligations under this permit. Since their dismissal, the Township has begun dry weather screening while BMP inspections have continued. Six outfalls were the subject of dry weather screening this reporting period. The Township intends to increase this effort in the next reporting period. The Township

maintains a written record of all activities pertaining to the identification and elimination of illicit discharges.

**BMP#5: Enact a Stormwater Management Ordinance or SOP to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated small MS4.**

The Township adopted Chapter 199, known as the Kennett Stormwater Management Ordinance, into the Kennett Township Code. Article VIII of this ordinance prohibits the discharge of non-stormwater discharges to waters of the Commonwealth. The Township believes this ordinance is already generally compliant with DEP's 2022 Model Stormwater Management Ordinance.

**BMP#6: Provide educational outreach to public employees, business owners and employees, property owners, the general public and elected officials (i.e., target audiences) about the program to detect and eliminate illicit discharges.**

1. Newsletter. The Township publishes a biannual newsletter (Spring/Summer & Fall/Winter issues) that includes articles with general stormwater educational information. Depending on the season, the newsletter includes relevant information pertaining to the following:
  - a. Recycling Information and Guidelines;
  - b. Outfall and Basin Inspection Notices
  - c. Hazardous Waste Events/Disposal Guidelines;
  - d. Yard Waste Reminders;
  - e. Leaf Collection Guidelines;
  - f. Public Service Announcements;

The Township mails copies of the newsletter to every residential property (totaling over 3,000) within the Township as well as to rental properties. The newsletter is available for download from the Township's website at the following web address:

<https://kennett.pa.us/residents/newsletters>

The Township distributes educational materials to new homeowners moving into the Township via the New Resident mailing.

2. Pamphlets. The Township offers a variety of educational pamphlets pertaining to stormwater management in the lobby of the Township building. Pamphlets include the following:
  - a. "Tips to Prevent Water Pollution" published by Chester County;
  - b. "Protecting Water Quality from Urban Runoff" published by U.S. EPA;
  - c. "When it Rains, It Drains" published by PADEP;
  - d. "Storm Water Pollution Prevention Plan: A Guide for Construction Sites" published by U.S. EPA.

The Township distributes a copy of the "Don't Let Storm Water Run Off with Your Time and Money!" to developers along with any building permits issued which involve earth disturbance activities. The Township tracks the number of building permits issued which will facilitate measurement of pamphlet distribution.

3. Web Page. The Township maintains a dedicated stormwater web page on the website that contains information regarding the Township's Stormwater Management Program. The web page notes that the Township's MS4 stormwater discharge is regulated by the NPDES permitting program. The web page provides tips on how the public can reduce stormwater runoff pollution and informational resources. Finally, the web page includes a link to the DEP Stormwater BMP

Manual. The Township's website featuring stormwater management information can be accessed at the following web address: <https://www.kennett.pa.us/182/Stormwater-MS4>

4. Public Meetings. Each calendar year, the Township provides a comprehensive presentation regarding the Township's Stormwater Management Program during a publicly advertised meeting. The meeting reviews the Township's obligations under the NPDES General Permit and report on the Township's progress, activities and accomplishments in implementing the Stormwater Management Plan. At the conclusion of the presentation, the Township provides an opportunity for attendees to offer questions and comments.

**APPENDIX 4**  
**CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

Kennett Township (Township) is relying on PA's statewide program for stormwater associated with construction activities to satisfy this MCM.

**BMP #1: The permittee may not issue a building 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.**

Kennett Township complies with this requirement.

**BMP#2: A municipality or county which issues building or other permits shall notify DEP or the applicable CCD 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 § 102.42.**

The Township requires all applications for projects involving one acre more of earth disturbance to be submitted directly by the applicant to the Chester County Conservation District.

**BMP#3: 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.**

Kennett Township complies with this requirement and believes its ordinance is already generally compliant with DEP's 2022 Model Stormwater Management Ordinance.



**APPENDIX 5**  
**POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT**  
**AND REDEVELOPMENT**

**BMP #1: 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.**

Kennett Township complies with this requirement and believes its ordinance is already generally compliant with DEP's 2022 Model Stormwater Management Ordinance.

**BMP#2: Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new development and redevelopment. Measures should also be included to encourage retrofitting LID into existing development. Enact ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices.**

Kennett Township complies with this requirement and believes its ordinance is already generally compliant with DEP's 2022 Model Stormwater Management Ordinance.

**BMP#3: Ensure adequate O&M 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.**

The Township previously generated mapping of its regulated small MS4, including BMP locations and associated drainage areas. This mapping was used as the basis for the TMDL Plan submitted to DEP on September 14, 2017. In its deficiency letter dated July 11, 2018 and discussed at a meeting involving DEP, Township officials, and AECOM on August 21, 2018, numerous revisions to this mapping were needed. Updates to this mapping are on-going and information about BMPs will be provided in the revised TMDL report and the next Status Report.

The Township has prepared a Post Construction Stormwater Management Program to address MCM#5 of the Township's Stormwater Management Plan. This Program includes inventorying, inspection, and maintenance of stormwater management facilities was implemented by Township Staff.

The Township is relying on PA's statewide program for stormwater associated with construction activities to satisfy BMP #4, BMP #5 and BMP #6 for this MCM.

**APPENDIX 6**  
**POLLUTION PREVENTION / GOOD HOUSEKEEPING**

**BMP #1: Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the MS4. This includes activities conducted by contractors for the permittee.**

The Township has prepared a Pollution Prevention / Good Housekeeping Program to address MCM#6 of the Township's Stormwater Management Plan. This Program includes the identification and documentation of all operations that are owned or operated by the Township and have the potential for generating pollution in stormwater runoff to the MS4. This includes activities conducted by contractors for the permittee.

**BMP#2: Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated MS4.**

The Township has prepared a Pollution Prevention / Good Housekeeping Program to address MCM#6 of the Township's Stormwater Management Plan. This Program includes operations and maintenance guidelines for the identified facilities.

**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 operations to the regulated small MS4. All relevant employees and contractors shall receive training.**

The Township complies with this requirement. Public Works staff typically meets at the beginning of each month to discuss topics including vehicle and equipment fueling, proper equipment fueling, solid waste handling, roadway, sidewalk and bridge maintenance, cold weather operations such as salting, secondary containment, and stormwater basin maintenance.