

**TOWNSHIP OF PENNSAUKEN
CAMDEN COUNTY, NEW JERSEY**

New Jersey Department of Environmental Protection
TIER A MUNICIPAL STORMWATER GENERAL PERMIT
No. NJG0148989 P.I. ID No. 207740

**STORMWATER POLLUTION PREVENTION PLAN
MARCH 2005
VOLUME 1 of 2**

Initial	<u>See Original Signed Title Page</u>	
Submittal	Dennis O'Rourke, P.E. Township Engineer	Date: _____

<u>Rev.</u>	<u>Date</u>	<u>Description</u>	<u>Signature</u>	<u>Date</u>
1	May 2006	General Revision of SPPP Forms		
2	April 2007	General Revision of SPPP Forms		
3	April 2008	Revision to SPPP Forms 4, 5, 7, 8, 11, 12 (Log Only), 13, 14, 15.		
4	June 2009	General Revision of SPPP Forms due to Permit Renewal SPPP separated into Volumes 1 & 2		
5	April 2010	Revision of SPPP Forms 4, 5, 11, 12, 13, & 17		
6	April 2011	Revision of SPPP Forms 2, 4, 10, 12, 13, 14, 15 for 2010 activity		
7	April 2012	Revision to SPPP for Year 2011 activity		
8	April 2013	Revision to SPPP for Year 2012 activity		
9	April 2014	Revision to SPPP Forms for Year 2013 activity		
10	April 2015	Revision to SPPP Forms for Year 2014 activity		
11	April 2016	Revisions to selected SPPP Forms for 2015 Activity		
12	Feb. 2017	Revisions to selected Forms for 2016 Activity		
13	Feb/Dec 2018	Revision to all Forms due to permit renewal + for 2018 Activity		
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17				
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19				

PREPARED BY:
T&M ASSOCIATES



1256 NORTH CHURCH STREET
MOORESTOWN, NJ 080557-1129

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TOWNSHIP OF PENNSAUKEN
CAMDEN COUNTY, NEW JERSEY

STORMWATER POLLUTION PREVENTION PLAN
SUMMARY

This Stormwater Pollution Prevention Plan (SPPP) has been prepared as required by the New Jersey Department of Environmental Protection Pollution Discharge Elimination System (NJPDES) Tier A Municipal Stormwater Master General Permit (NJ0141852). The General Permit is referred to as the “Tier A MS4 NJPDES permit” and authorizes all new and existing stormwater discharges to surface water and groundwater from the small municipal separate storm sewer system (MS4) owned and operated by Pennsauken Township. The Township requested and received Authorization to Discharge effective April 1, 2004 and was assigned NJPDES No. NJG0148989 and P.I. ID No. 207740. **The Effective Date of Permit Authorization (EDPA) is April 1, 2004.**

The requirements applicable to the Municipal Stormwater Regulation Program (MSRP) are in NJAC 7:14A-25 which regulate discharges to surface water and groundwater. In addition, the Tier A MS4 Permit requires the implementation of the NJ Stormwater Management Rule at NJAC 7:8. This Rule establishes the minimum standards for stormwater management design for new development and redevelopment projects.

Under the General Permit, every Tier A municipality in New Jersey is required to develop, implement, and enforce a Stormwater Program. The Program shall be designed to reduce the discharge of pollutants from the municipality’s MS4 to the maximum extent practicable. To accomplish this goal, the Program must comply with the Statewide Basic Requirements (SBRs), Additional Measures (AMs), and Optional Measures (OMs) contained in the General Permit. As of the EDPA, there were no Additional Measures adopted by the NJDEP.

The Pennsauken Township SPPP along with the Stormwater Management Plan and the Stormwater Ordinances basically constitutes the Township’s “Stormwater Program”. The SPPP addresses each of the SBRs contained in the Tier A General Permit and describes the method of compliance for each SBR. The SPPP also is the document for recordkeeping and documenting how SBR compliance was achieved. The SPPP should be reviewed and revised at least annually in order to submit the Annual Report (see below). In addition, as of January 2018, selected SPPP Forms are to be posted on the Township website.

The SPPP (and any revision) is not submitted to the NJDEP. It is signed, dated, and retained by the Stormwater Program Coordinator (at present, the Township Engineer). The SPPP shall be made available for review to a representative of the NJDEP upon request, usually during a Compliance & Enforcement audit. The SPPP and any revision and any Annual Reports and Certifications are to be maintained for a period of 5 years.

TOWNSHIP OF PENNSAUKEN
CAMDEN COUNTY, NEW JERSEY

STORMWATER POLLUTION PREVENTION PLAN
SUMMARY(cont.)

ANNUAL REPORT & CERTIFICATION

The SPPP serves as the basis for the **Annual Report and Certification** that is required to be submitted to the NJDEP by Pennsauken Township. The Annual Report and Certification summarizes the status of the Township's compliance with each of the SBRs contained in the General Permit. **The Annual Report and Certification is required to be submitted by May 2nd each year and includes activities for the period January 1st to December 31st of each reporting year.**

NOTE: As of the 2010 Report (filed April 2011), the Annual Report & Certification is required to be filed through NJDEP Online. Instructions, Username, & Password are in the Annual Report and Certification Section in Volume 1 of the SPPP.

The Effective Date of Permit Authorization (EDPA) is April 1, 2004. The initial 5 year permit expired February 29, 2009. The Permit was automatically renewed in 2009 with a new permit expiration date of **February 28, 2014**. The 2009 permit renewal included some additional requirements but did not substantially change the 2004 permit. Copies of each are included in Volume 1 of the SPPP.

As of **April 2015**, the NJDEP required that a Supplemental Questionnaire be submitted as an attachment to the Annual Report to be submitted by May 2, 2015.

In **January 2018**, the NJDEP reissued the Tier A MS4 NJPDES Permit with an **EDPA of January 1, 2018**. Unlike the 2009 renewal, the 2018 permit is significantly reorganized and is a significant expansion of the permit requirements.

**TOWNSHIP OF PENNSAUKEN
CAMDEN COUNTY, NEW JERSEY**

New Jersey Department of Environmental Protection
TIER A MUNICIPAL STORMWATER
GENERAL PERMIT
No. NJG0148989
P.I. ID No. 207740

**STORMWATER POLLUTION PREVENTION PLAN
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VOLUME 2 of 2**

Initial Submittal	<u>See Original Signed Title Page</u>	_____
	Dennis O'Rourke, P.E. Township Engineer	Date:

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1				

See Volume 1 for
Signature Page

PREPARED BY:

T&M ASSOCIATES



1256 NORTH CHURCH STREET
MOORESTOWN, NJ 080557-1129

Tier A Municipal Stormwater Regulation Program

Stormwater Pollution Prevention Team Members

Number of team members may vary.

Completed by: Dennis O'Rourke

Title: Township Engineer

Date: Dec 2018

Municipality: Pennsauken Township

County: Camden

NJPDES #: NJG0148989

PI ID #: 207740

Stormwater Program Coordinator: Dennis O'Rourke, P.E.

Title: Township Engineer

Office Phone #: 856- 665-1000 x148

Emergency Phone #: _____

Public Notice Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Post-Construction Stormwater Management Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Local Public Education Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Ordinance Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Public Works Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Employee Training Coordinator: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

Other: _____

Title: _____

Office Phone #: _____

Emergency Phone #: _____

SPPP Form 2 – Public Notice

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipality shall comply with applicable state and local public notice requirements when providing for public participation in the development and implementation of the Tier A Municipality's stormwater program.

Tier A Municipality shall make records required by the permit, including the SPPP, available to the public during regular business hours (See NJAC 7:14A-18 for confidentiality provisions).

Pennsauken Township provides public notice of meetings as required by the Open Public Meetings Act ("Sunshine Law," N.J.S.A. 10:4-6 et seq.) and as required by N.J.S.A. 40:49-1 et seq. for the passage of ordinances.

The Township provided public notice of municipal actions such as the adoption of the Stormwater Management Plan as outlined in the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.).

Public notice was made May 29, 2005 prior to the June 9, 2005 Planning Board meeting at which time the Stormwater Management Plan was adopted.

Public notice was made Oct 14, 2005 at the time of adoption of Ordinances required by the permit.

Public notice was made May 13, 2006 prior to the May 24, 2006 Township Committee meeting at which time the Stormwater Control Ordinance was adopted.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009

Public Notice was made April 9, 2010 prior to adoption of new stormwater Ordinances 2010-07 (Retrofitting of Private Storm Drain Inlets) and 2010-0 (Dumpster / Solid Waste). Also, Ordinance 2010-03 revising Chapter 269 regarding placement of solid waste in the street.

SPPP Form 2 – Public Notice (cont.)

January 2018 Permit Renewal

The permit renewal added the requirement that the current SPPP be posted on the municipal website with the exceptions noted per Part IV.F.1.f.

The permit renewal added the requirement that the current Municipal Stormwater Management Plan (SMP) and all Ordinances required by this permit be posted on the municipal website.

The Stormwater Management Plan (SMP) and the Stormwater Pollution Prevention Plan (SPPP) have always been available to the public upon request. The documents are kept in the office of the Stormwater Program Coordinator at the Township Municipal Building.

*The latest revisions of both the SPPP and the SMP are posted on the Township's website.
The website is **www.twp.pennsauken.nj.us***

All Township Ordinances are on the website as codified in the Code of the Township of Pennsauken. This complies with the permit requirement. In addition, those Ordinances specifically required by the stormwater permit were included on the Township website on the Stormwater Management page in May 2018.

Permit Part IV.F.1.f exempts the posting of the names of the SPPP team members, but it must include the name of the Stormwater Coordinator. It also exempts the posting of Inspection Logs and other required record keeping forms. The SPPP posted complies with the requirement.

The Township Stormwater Coordinator reviews and revises SPPP Forms on an annual basis, as applicable. This is done to document stormwater program activity in the previous year and to facilitate preparation and submittal of the Annual Report & Certification. At that time, any revised SPPP forms will be posted to the Township website.

SPPP Form 3 – New Development and Redevelopment Program

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

The Tier A Municipality shall develop, implement, and enforce a program to address stormwater runoff from new development and redevelopment projects both operated and not operated by the municipality that disturb one acre or more. Disturbance of one acre or more is considered Major Development as defined by the MSRP. This SBR also includes projects less than one acre that are part of a larger common plan of development or sale, that discharge into the municipality's small MS4.

The Tier A Municipality shall adopt, amend and implement a written Stormwater Management Plan (MSWMP) pursuant to N.J.A.C. 7:8 to describe the framework of the Municipality's strategy, structure and process for its post-construction stormwater management program. The Municipality shall submit the adopted plan to the County review agency for approval. The Municipality shall post the approved plan and any amendments on its website within thirty (30) days of the effective date of the plan. The Municipality shall review and update the plan as necessary as part of the reexamination of its Master Plan.

The Tier A Municipality shall adopt, amend, implement and enforce a Municipal Stormwater Control Ordinance in accordance with N.J.A.C. 7:8. The Ordinance shall control aspects of residential development and redevelopment that are not pre-empted by Residential Site Improvement Standards (RSIS). The Ordinance shall control stormwater from non-residential development and redevelopment projects.

The Tier A Municipality shall enforce compliance with the storm inlet design standards per Attachment C to control passage of solid and floatable materials through the storm drain inlets that are not installed by the municipality as part of development and redevelopment projects.

The Tier A Municipality shall ensure adequate long-term cleaning, operation and maintenance of stormwater measures that are both owned or operated by the Municipality and that are not owned or operated by the Municipality.

*The Township Planning Board adopted a Stormwater Management Plan Master Plan Element in accordance with N.J.A.C.7:8-4 on **June 9, 2005**. The Plan was submitted to the County Review Agency in September 2005. No approval was ever received from the County. The MSWMP is posted on the Township website. Any re-examination of the Master Plan will include the Stormwater Management Plan Element.*

*A Stormwater Control Ordinance for stormwater management applicable to major, non-residential development was adopted by the Township Committee at the public meeting on **May 24, 2006**. Ordinance No. 2006-15. The Ordinance was submitted to the County Review Agency on **June 20, 2006**. No comments were received from the County.*

The Stormwater Control Ordinance revised Township Code Chapter 141 - Development Regulations to make the NJDEP Stormwater Management Rules in Appendix B of Subchapter 7 of the Residential Site Improvement Standards (RSIS) applicable to both residential and non-residential development.

SPPP Form 3 – New Development and Redevelopment Program (con't.)

Following a review of the Model Stormwater Control Ordinance for Municipalities contained in the NJ Stormwater Best Management Practices Manual, it was determined to be essentially a duplicate of Appendix B of Subchapter 7 of RSIS. Therefore, rather than create a new Ordinance to reiterate the RSIS requirements, Chapter 141 was simply revised to make Appendix B of Subchapter 7 of RSIS applicable to non-residential development.

The Residential Site Improvement Standards (RSIS) have been in effect for residential development and redevelopment projects. Per Section 5:21-1.5 of RSIS, Scope and Applicability, "These rules shall govern any site improvements...in connection with any application for residential subdivision, site plan approval, or variance before any Planning or Zoning Board". The MSRP is applicable to major residential development projects and therefore, the standards of RSIS are applicable including the Stormwater Management requirements of Subchapter 7.

The Planning & Zoning Dept. and the Construction Dept. review major residential and non-residential development or redevelopment projects to confirm compliance with RSIS. The review for the Planning & Zoning Dept. is performed by T & M Associates as a consultant. Projects are considered major development/redevelopment if there is disturbance of one acre or more or additional impervious surface of ¼ acre.

Long-term cleaning, operation and maintenance of stormwater measures on property owned or operated by the municipality is performed by the Township.

Long-term cleaning, operation and maintenance of stormwater measures on property not owned by the municipality is performed by the property owner. These are stormwater management measures associated with major development projects initiated after the effective date of the Stormwater Control Ordinance in May 2006. The Stormwater Control Ordinance contains provisions for the maintenance of any stormwater measures to be performed by the owner of the property. When lack of maintenance is identified, the owner is notified to perform said maintenance.

Since the EDPA, storm drain inlets installed, reconstructed, or retrofitted by the Township comply with standards of Attachment C of the Permit. Since adoption of the Stormwater Control Ordinance in May 2006, the Township has required that new storm inlets not installed by the Township also meet the requirements of Attachment C of the Permit.

NOTE: The installation of new storm drain inlets as part of major development or redevelopment project is a requirement of this SPPP 3. Although not specifically required by this SBR, the Township has required compliance with Attachment C for all projects that have storm drain inlets within the project limits even if the limit of disturbance does not exceed 1 acre and the project is not, by definition, major development.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

SPPP Form 3 – New Development and Redevelopment Program (con't.)

January 2018 Permit Renewal

The permit renewal added the requirement that a Major Development Stormwater Summary be completed for each structural and non-structural stormwater measure when an application is made to the Tier A Municipality. The Summary shall be updated while the stormwater measures are being installed. It shall be finalized once a Certificate of Occupancy is issued. And it shall be maintained and made available to the NJDEP upon request.

Effective January 1, 2018, it is required to complete, update, finalize and maintain a Major Development Stormwater Summary for each structural and non-structural stormwater measure being installed as part of a project. While the SBR directs the responsibility to the Tier A Municipality, the Township places the responsibility of submitting, updating, and finalizing the Summary on the Applicant / Developer. The Summary is then maintained in the SPPP.

T & M Associates are the consulting engineers to the Planning & Zoning Boards and therefore have the responsibility to review and approve development & redevelopment plans. T & M Associates were informed by letter March 16, 2018 of the new permit requirement for a Major Development Stormwater Summary. They in turn prepared a Review and Approval Procedure which is included with this SPPP.

The January 1, 2018 permit renewal requires that stormwater facilities not owned or operated by the Municipality and constructed after February 7, 1984 are confirmed to be cleaned, operated and maintained in order to assure their proper function. The permit places the burden of this requirement on the Municipality. The Major Development Projects List attached to this SPPP Form 3 lists only major development projects since the stormwater control ordinance went into effect in May 2006. SPPP FORM 3 will continue to simply list projects considered major development or redevelopment.

However, in order to comply with the permit requirements, a Stormwater Facilities Log (Private) has been created and is included with SPPP Form 18. The Log lists all stormwater facilities not owned or operated by the Municipality, and as such, any major development or redevelopment project, once completed, is added to the Log since it then falls under the program for ongoing stormwater facilities maintenance of private facilities.

SPPP Form 4 – Local Public Education Program

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

The Local Public Education Program describes how the Tier A Municipality will distribute educational information and specifics on how educational activities, including the educational event, will be conducted to satisfy this minimum standard.

Tier A Municipalities shall provide for the duplication and annual mailing (or other means of delivery) to all residents and businesses in the municipality of the informational brochure provided by the Department.

Tier A Municipalities shall also conduct each year, at a minimum, one education effort in the form of an “event”...During the “event”, the informational brochure shall be made available to the public.

Annual Mailing / Distribution of Brochure

Pennsauken Township will publish the NJDEP brochure in the Township newspaper “All Around Pennsauken”. All Around Pennsauken is mailed to all residential and business occupants in the Township. This method of distribution is considered to be more effective than mailing the brochure to property owners (i.e. with tax bills) since a percentage of owners do not live in the Township and therefore do not have a direct involvement in the community.

Annual Event

In 2005, the event was the cleanup of Heritage Park / Tippins Pond on May 14th. The event was published in All Around Pennsauken and all residents and business owners were invited to participate. The Heritage Park / Tippins Pond area is considered an historic location along the Delaware River. The cleanup was coordinated with the completion of a new boardwalk by New Jersey Transit.

The event was considered precisely what the Municipal Stormwater Program is all about. Those participating in the cleanup could appreciate the beauty of the environment and, at the same time, see plastic bottles, styrofoam cups, trash, etc. washing up onshore. The visual message was the perfect complement to (and likely more effective than) the brochure.

In 2006, the Township again conducted a cleanup of Heritage Park / Tippins Pond on June 10, 2006.

In 2007, the Township held the annual cleanup of Heritage Park/Tippins Pond on June 16, 2007.

In 2008, the Township held the annual cleanup of Heritage Park/Tippins Pond on June 14, 2008.

***NOTE:** The requirement for an “annual event” was discontinued with the March 2009 permit renewal.*

Additional Cleanup Events

***January 2008** – Pennsauken High School students known as the “Green Indian Club” performed a cleanup of the Derosse Ave. boat ramp and adjoining banks of the Delaware River as a school project.*

SPPP Form 4 – Local Public Education Program (con't.)

Additional Cleanup Events (cont.)

March 2008 – Members of the Living Faith Christian Center performed a cleanup of Tippins Pond as part of its “Operation Pennsauken”.

April 2008 – Members of the Living Faith Christian Center performed a cleanup of the drainage area behind the Intermediate School/Chadwyck II development. They were assisted by Pennsauken Public Works Dept. employees. Drainage area is part of an unnamed, intermittent tributary to the South Branch of the Pennsauken Creek.

March 2009 Permit Renewal

The Public Education SBR was revised as part of the 2009 permit renewal. Tier A Municipalities shall annually conduct educational activities that total a minimum of **10 points**. Each approved activity is listed and has been assigned a point value in **Attachment E** of the permit (copy attached to this SBR).

Tier A Municipalities shall certify annually that they have accumulated the number of points required to meet the Local Public Education Program minimum standard. Dates (month, day, year) and details of each educational activity shall be reported to the Department in the Annual Report.

2009

The following educational activities were performed to satisfy the SBR requirement of 10 points.

Website – A stormwater related page was created June 5, 2009 on the municipal website and includes a link to www.cleanwater.nj.org. (1 point)

Stormwater Display – A Community Cleanup was conducted on June 13, 2009 along the Rt. 130 & Rt 73 interchange ramps. The NJDEP stormwater brochure was distributed at the event (similar to what has been done previously at the Tippins Pond/Heritage Park cleanup). (2 points)

Utilize Department Materials to broadcast a public service ad on local public service television. A public service video was broadcast on Channel 19 (local public service television station) periodically in 2009. Text of the announcement is included with this SPPP. (2 points)

Stormwater Training for Elected Officials – Conduct a program for elected municipal officials which educates them on the Stormwater Management Rules (N.J.A.C. 7:8), Tier A Permit and what steps the municipality has already taken to minimize water pollution. The training program for the Township Committee was conducted July 8, 2009. (3 points)

Mailing – The stormwater brochure was published in the local newspaper, All Around Pennsauken, which is mailed to every resident and business in the township. This is a continuation of what was done in past years. (3 points)

2010

The following educational activities were performed to satisfy the SBR requirement of 10 points

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Utilize Dept. Materials to broadcast a public service ad on local public service television. (2 points)

Mailing – Publish the stormwater brochure in local newspaper, All Around Pennsauken. (3 points)

Ordinance Education – Distribute a letter from the Mayor to every resident and business via All Around Pennsauken newspaper discussing the various stormwater Ordinances. (5 points)

SPPP Form 4 – Local Public Education Program (con't.)

2011 & 2012

The Township performed the following Local Public Education activities for a total of 11 points.

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Utilize Dept. Materials to broadcast a public service ad on local public service television. (2 points)

Mailing – Publish the stormwater brochure in local newspaper, All Around Pennsauken. (3 points)

Ordinance Education – Distribute a letter from the Mayor to every resident and business via All Around Pennsauken newspaper discussing the various stormwater Ordinances. (5 points)

Additional Cleanup Event

Nov 2012 – Cleanup of area around Derosse Ave. Boat Ramp by Environmental Commission And the Public Works Dept.

2013

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Ordinance Education – Distribute a letter from the Mayor to every resident and business via All Around Pennsauken newspaper discussing the various stormwater Ordinances. (5 points)

Stormwater Display – Township conducted Green Fair April 20, 2013. Stormwater education materials were available to the public (2 points).

Mailing – Publish the stormwater brochure in local newspaper, All Around Pennsauken. (3 points)

2014

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Ordinance Education – In the April 2014 edition of All Around Pennsauken, the annual stormwater ordinance education article was published. A link to the Township website was included to view the Ordinances themselves. (5 points).

Stormwater Display – Township conducted Green Fair April 2014. Stormwater education materials were available to the public (2 points).

Mailing – The stormwater brochure was published in the November 2014 issue of All Around Pennsauken (3 points).

Cleanup Event – The Pennsauken Environmental Commission performed a cleanup of the Derosse Ave. boat ramp site on the Delaware River. The Environmental Commission has adopted this site as part of the Clean Communities Program.

2015

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Ordinance Education – In the April 2015 edition of All Around Pennsauken, the annual stormwater ordinance education article was published. A link to the Township website was included to view the Ordinances themselves. (5 points).

Mailing – The stormwater brochure was published in the November 2015 issue of All Around Pennsauken (3 points).

Ordinance Education – In addition to publishing the Ordinance Education article in All Around Pennsauken, the article was available on the Township website. (1 credit point taken).

Cleanup Event – In April 2015, the Pennsauken/Merchantville Girl Scout Troop performed a cleanup of the Recreation complex known as "the Pit". Area is directly adjacent to the north branch of Chandlers Run.

SPPP Form 4 – Local Public Education Program (con't.)

2016

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Ordinance Education – In the October 2016 edition of *All Around Pennsauken*, the annual stormwater ordinance education article written by the Mayor was published. A link to the Township website was included to view the Ordinances themselves. (5 points).

Mailing – The stormwater brochure was published in the October 2016 issue of *All Around Pennsauken* (3 points).

Cleanup Event – In April 2016, the Pennsauken/Merchantville Girl Scout Troop and Public Works Dept. performed a cleanup of the Derausse Ave. boat ramp site on the Delaware River. (1 point).

2017

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Ordinance Education – In the October 2017 edition of *All Around Pennsauken*, the annual stormwater ordinance education article written by the Mayor was published. A link to the Township website was included to view the Ordinances themselves. (5 points).

Mailing – The stormwater brochure was published in the October 2017 issue of *All Around Pennsauken* (3 points).

Cleanup Events – In 2017, there were 2 cleanups of Tippin's Pond recreation area. The 1st was held March 3rd, and the 2nd was held in October. (2 points).

SPPP Form 4 – Local Public Education Program (con't.)

January 2018 Permit Renewal

The January 2018 permit renewal expands this SBR to Local Public Education and Outreach. Tier A Municipalities shall annually conduct activities that total at least **12 points** and include activities from at least **three (3)** of the **five (5)** categories set forth in **Attachment B** of the permit.

NOTE: a copy of Attachment B is included with this SBR. It supersedes Attachment E from the March 2009 permit.

At a minimum, at least one of the activities shall involve educating businesses and the general public of hazards associated with illicit connections and improper disposal of waste.

The activities conducted in order to achieve the required 12 points are listed below. Documentation of those activities is included in the SPPP.

Advertisement of activities related to the Stormwater Public Education Program is via the Township website/Facebook Page or by publication in All Around Pennsauken.

NOTE: The labelling of storm drain inlets is addressed in SPPP Form 5.

2018

Category 1: General Public Outreach

Website – Maintain the existing website & link to njstormwater.org. (1 point)

Television – A public service announcement from NJDEP website was broadcast on Ch. 19 (1 point)

Category 2: Targeted Audience Outreach

Mailing – Publish stormwater educational material in All Around Pennsauken which is mailed to every resident & business in the Township. (2 points)

Ordinance Education – A letter from the Mayor was published in All Around Pennsauken discussing the stormwater Ordinances. (3 points)

Category 3: School/Youth Education and Activities

Cleanup Event – A cleanup of Tippins Pond was conducted in March 2018 organized by the Public Works Dept. and the Environmental Commission. (3 points)

Educational Contest – An anti-littering poster contest was sponsored by the Pennsauken Township Green Team, the Public Schools and the Delaware Gardens Neighborhood Initiative. 3 points

2019

SPPP Form 5 – Storm Drain Inlet Labeling

Municipality Information

Municipality: Pennsauken Township County Camden
 NJPDES # : NJG0148989 PI ID #: 207740
 Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18
 Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipality shall establish a storm drain inlet labeling program and label all storm drains that are along municipal streets with sidewalks, and all storm drains within plazas, parking areas, or maintenance yards that are operated by the municipality. The program shall establish a schedule for labeling, develop a long term maintenance plan and, when possible, coordinate efforts with watershed groups and volunteer organizations.

The inlet labeling program was accomplished by dividing the Township into two sections.

Section 1: Area north and west of Route 130. Labeling was completed by April 1, 2007.

Section 2: Area south and east of Route 130. Labeling was completed by April 1, 2009.

Inlet labeling was accomplished using a stainless steel label "No Dumping – Drains to River" on or adjacent to the inlet. The original effort in Section 1 used a standard Almetek label. However, after less than 1 year the markers started coming loose requiring that many Section 1 inlets be re-labeled. The new label is DAS Curb Marker 800, model DAS, "No Dumping - Drains to Stream".

The 2nd method of labeling is by retrofitting a new inlet curb piece; a new grate; or a safety bar across the mouth of the curb inlet. Each of these new pieces has the "No Dumping" message cast into the piece.

The Township labeled all storm drain inlets regardless of the existence of sidewalk.

MUNICIPAL PROPERTIES

- Public Works Yard – no storm inlets existing
- Leaf Compost Site – no storm inlets existing
- Municipal Building / Library Complex – 4 inlets retrofitted & labeled
- Police Administration / Court Building – 3 inlets retrofitted & labeled
- Fire Station 11-1 – no storm inlets existing
- Fire Station 11-2 – no storm inlets existing
- Fire Station 11-3 – 1 inlet retrofitted & labeled
- Fire Station 11-5 – no storm inlets existing
- Municipal Parking Lot at Westfield Ave. & Scovel Ave. – no storm inlets existing
- Municipal Parking Lot at Westfield Ave. & Browning Rd. – no storm inlets existing

Long Term Label Maintenance Program

For the long term maintenance of the inlet labels, the Public Works Dept. personnel will confirm the existence of a label during the annual inspection of inlets required per SPPP Form 13, Storm Drain Inlet Inspection and Cleaning. The inspection sheet used by Public Works Dept. crew include a checkoff box for inlet label existing or not existing.

SPPP Form 5 – Storm Drain Inlet Labeling (cont.)

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

In the period February 2012 to April 2012, the Township Engineer / Stormwater Program Coordinator and Public Works Dept. conducted a joint inspection of all inlets under Township jurisdiction to confirm cleanliness and labels existing. Inspection sheets were completed(and revised as needed); inlets were cleaned as needed; and any missing labels were reattached. A final inlet count was determined and has included in SPPP Form 13.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

No change to the Township's inlet labeling program is needed.as a result of the January 2018 permit renewal. The annual inspection of inlets has proven effective at identifying missing labels. Any found missing are replaced.

The new permit no longer requires annual inspection of all storm drain inlets. The new requirement is that every inet is to be inspected at least once every 5 years. However, the Township still performs cleaning of a percentage of inlets every year. As a minimum, labels will be confirmed to exist at least once every 5 years or whenever storm drain inlets are cleaned.

SPPP Form 6 – MS4 Outfall Pipe Mapping

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipality must develop a map showing the location of the end of all MS4 outfall pipes that are operated by the municipality, and that discharge within the Tier A Municipality's jurisdiction to a surface water body (including an intermittent stream).

The map shall show the location and name of the surface water body receiving the discharge.

The map shall note each outfall pipe with an individual alphanumeric identifier.

The municipality is to be divided into two (2) sections. Outfall pipes in one section are to be located and mapped within 36 months and the 2nd section within 60 months.

As required by the SBR, the Township was divided into two sections.

Section 1 is the area north and west of Route 130 and outfall mapping was completed February 2007.

Section 2 is the area south and east of Route 130 and outfall mapping was completed April 2009.

The locations of stormwater outfall pipes that discharge to a surface water body have been mapped on a 1" = 600' street map of the entire Township. The map identifies the surface body of water to which the outfall discharges. The map was prepared by T & M Associates.

For those outfall pipes that are considered owned or operated by the Township, a unique alphanumeric number has been assigned. The numbering "system" utilizes the existing division of the Township into 17 areas. The 1st number in the outfall identifier is the area number and the last number is simply a sequential identifier. For example, Outfall No. 9OUT03 is the 3rd identified outfall in Area 9.

The permit does not require the Township to map outfalls considered owned or operated by another entity. However, some such outfalls have been identified, where known. For example, outfalls existing along the Cooper River are under the jurisdiction of the Camden County Parks Dept. Outfalls adjacent to the Betsy Ross Bridge are under the jurisdiction of the DRPA.

*As of April 2009 there were **7 Outfalls** identified in **Section 1** and **25 Outfalls** identified in **Section 2** for a total of **32** outfalls believed under municipal jurisdiction. A copy of the outfall pipe map is included in the SPPP.*

As of April 2009, compliance with this SBR is complete.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

SPPP Form 6 – MS4 Outfall Pipe Mapping

January 2018 Permit Renewal

The SBR for Outfall Pipe Mapping was modified to state:

Tier A Municipalities shall develop, update and maintain an outfall pipe map showing the location of the end of all MS4 outfall pipes (tidal and non-tidal) owned or operated by the Tier A Municipality which discharge to a surface water body.

The outfall pipe map shall:

- Be current at the end of each calendar year.
- Show the location (and name, if known) of the surface water bodies receiving discharges from those outfall pipes.
- Be included in the SPPP.
- Be provided to the Department on or before EDPA + 12 months (January 1, 2019).
- Be submitted electronically by December 21, 2020 via the Department's designated electronic submission service.

The January 2018 permit renewal modified this SBR; however, the Township map remains in compliance.

The existing map was reviewed and revised prior to submittal to the NJDEP in December 2018. The total number of outfalls has been revised as some outfalls were deleted since they did not meet the definition of an outfall. A new outfall was identified and added to the map (13OUT02).

The names of surface water bodies were shown even if considered an "unnamed stream or drainage ditch".

Discharges to detention or retention stormwater basins are not considered outfalls.

Some outfalls not owner or operated by the Township are shown on the map.

An Index of MS4 Outfall Pips is included with this SPPP. The Log is in agreement with the latest Map.

The latest revision of the Outfall Map was mailed to the NJDEP Bureau of Nonpoint Pollution Control on December 14, 2018.

The Outfall Map will be submitted electronically to the Department by December 21, 2020.

NOTE re: As-Building of Township Storm Sewer System

As of December 2018, the Township is in the early planning stages of a project to as-build the storm drainage system. The project is expected to be done during the period June 2020 to June 2021. Such an as-building project is expected to confirm the outfalls currently shown on the Outfall Map. It is also expected that the as-building project will identify outfalls not currently known.

The map submitted electronically to the Department by December 21, 2020 is expected to be the latest available.

NOTE re: Crossreferencing of Outfall Pipe Information

Should a new outfall be identified during the as-building project, it will be added to the Outfall Pipe Map. In addition, an Illicit Connection Inspection Report will be prepared and filed. See SPPP Form 7. In addition, the new outfall will be added to the Stream Scour Inspection Log included with SPPP Form 9.

SPPP Form 7 – Illicit Connection Elimination Program

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipality must develop and implement a program to detect and eliminate illicit connections into the Tier A Municipality's MS4. The program, at a minimum, must include an initial physical inspection of all its outfall pipes. All outfall pipes that are found to have dry weather flow are to be further investigated.

The inspections of outfall pipes and investigations of dry weather flows are to be conducted in accordance with the procedures for detecting, investigating, and eliminating connections contained in Appendix B of the permit. (copy is attached). Results of the inspections of outfall pipes and dry weather flows are to be recorded on the Department's Illicit Connection Inspection Report Form. Inspection reports for dry weather flows discovered as a result of the initial physical inspections or as part of the ongoing program must be submitted to the Department with the Annual Certification.

Each Tier A Municipality shall, to the extent allowable under State law, effectively prohibit through ordinance, illicit connections to the Tier A Municipality's MS4, and implement appropriate enforcement procedures and actions.

The Township utilized the services of T & M Associates to conduct an initial illicit connection inspection in combination with the locating and mapping of outfalls per SPPP Form 6. Illicit Connection Inspection Report Forms are documented as SPPP Form 8.

Section 1 outfalls under the jurisdiction of the Township were located by February 28, 2007 and an initial inspection performed. Dry weather flow was noted at one outfall (2OUT03). An Illicit Connection Inspection Report was submitted with the April 2007 Annual Report. An illicit connection is not suspected.

Section 2 outfalls under the jurisdiction of the Township were located by April 1, 2009 and an initial inspection performed. 9 Outfalls were found to have dry weather flow. Many of these are known by experience to be groundwater flow. None of the dry weather flows are suspected to be illicit connections.

In September 2005, Ordinance 2005-23 was adopted which prohibits illicit connections to the municipal storm sewer system (MS4). (See SPPP 10 for copy of Ordinance).

NOTE: *An area of the Township north of Camden City and west of Route 130 is served by combined sewers. A map of the combined sewer area is included in Volume 1 of the SPPP. Combined sewer areas are exempt from the requirements of the MSRP. However, most of the requirements of the MSRP are enforced throughout the entire Township regardless. **No outfall from the combined sewer area to a waterway exists within the Township..***

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

SPPP Form 7 – Illicit Connection Elimination Program

January 2018 Permit Renewal

The January 2018 permit renewal does not change the SBR in that the Tier A Municipality shall develop, update, implement and enforce an ongoing Illicit Discharge Detection and Elimination Program.

However, the SBR is modified to read:

Conduct visual dry weather inspection of all outfall pipes owned or operated by the municipality at least **once every 5 years** to determine if dry weather flow or other evidence of illicit discharge is present. Dry weather flow is flow occurring 72 hours after a rain event.

Otherwise the SBR is essentially the same in that the municipality is to investigate and eliminate any identified illicit connection and document in the SPPP actions taken.

The requirement to conduct a visual inspection of all outfall pipes owned and operated by the Municipality at least once every 5 years coincides with the 5 year inspection requirement for stream scour at outfall pipes.

As described in SPPP 6 – Outfall Pipe Mapping, the Township recognizes the need to have as-built mapping for the storm sewer system. The Township is in the early planning stages of the project. The tentative schedule is to as-build the storm sewer system during the period June 2020 to June 2021.

In addition to confirming existing known outfalls and possibly identifying new outfalls, an inspection for dry weather flow and stream scour will be conducted simultaneously. Any identified dry weather flow will be investigated, testing performed, if deemed necessary and documented as to the suspected reason for the dry weather flow.

As previously stated from the beginning of the MSRP, no illicit connections are suspected.

SPPP Form 8 – Illicit Connection Records

Municipality Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Prior to May 2, 2006

Note: Attach a copy of each illicit connection report form for outfalls found to have a dry weather flow.

Total Number of inspections performed this year?

None. Program to locate and map outfall pipes still to get started. The illicit connection inspection would follow finding and determining the outfall pipes that are owned or operated by the Township.

Number of outfalls found to have dry weather flow?

Number of outfalls found to have an illicit connection?

How many illicit connections were eliminated?

Of the illicit connections found, how many remain?

May 2, 2006 – May 1, 2007

Note: Attach a copy of each illicit connection report form for outfalls found to have a dry weather flow.

Inspections in Section 1 were completed February 28, 2007.

Total Number of inspections performed this year? *7 outfalls identified in Section 1.*

NOTE: *Map subsequently revised & 2 outfalls were deleted.*

Number of outfalls found to have dry weather flow? *1*

Number of outfalls found to have an illicit connection? *0*

How many illicit connections were eliminated? *NA*

Of the illicit connections found, how many remain? *NA*

May 2, 2007 – May 1, 2009

Note: Attach a copy of each illicit connection report form for outfalls found to have a dry weather flow.

Inspections in Section 2 were completed April 1, 2009.

Total Number of inspections performed this year? *25 outfalls identified in Section 2*

NOTE: *Map subsequently revised & 4 outfalls were deleted. One (1) outfall was added.*

Number of outfalls found to have dry weather flow? *9*

Number of outfalls found to have an illicit connection? *0*

How many illicit connections were eliminated? *NA – no illicit connections suspected*

Of the illicit connections found, how many remain? *NA*

SPPP Form 9 – Outfall Pipe Stream Scour Inspection and Control

Municipality Information	Municipality: <u>Pennsauken Township</u> County <u>Camden</u> NJPDES # : <u>NJG1418989</u> PI ID #: <u>207740</u> Effective Date of Permit Authorization (EDPA): <u>4-1-04 & 3-1-09 & 1-1-18</u> Date of most recent update: <u>Dec 2018</u>
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Statewide Basic Requirement

Tier A Municipalities shall develop and implement a stormwater outfall pipe scouring detection, remediation and maintenance program to detect and control localized stream and stream bank scouring in the vicinity of outfall pipes operated by the municipality. This program shall identify all areas where localized stream and bank scouring occurs as a result of stormwater discharges from the Tier A Municipality's MS4. These areas shall then be prioritized and repairs shall be scheduled and completed. Repairs shall be made in accordance with the standards for Soil Erosion and Sediment Control at N.J.A.C. 2:90-1.

The Tier A Municipality shall list the location of outfall scouring identified, the dates control measures are to begin, and the dates any control measures were completed.

Outfall pipes that fall under this SBR were identified and mapped as discussed in SPPP 6 – Outfall Pipe Mapping. By permit definition, an outfall pipe is the end of a portion of the MS4 that is operated by the municipality and located on property owned by the municipality and that discharges to surface water.

*The Tier A Guidance document also notes that this requirement applies to **active** scouring and not locations where scour had occurred but has now ceased. Also, this SBR relates to “localized” stream scour “in the vicinity of the outfall pipe”. However, the Township has gone beyond the outfall to address embankment erosion downstream of the outfall.*

*The inspection of outfalls in **Section 1** was completed in **February 2007**.
No evidence of scour at any of the outfall pipes was noted.*

*The inspection of outfalls in **Section 2** was completed in **March 2009**.
Some embankment erosion had been identified prior to the outfall inspections (17OUT03 & 17OUT04). Remediation was completed in 2007.*

*An **Outfall Pipe Stream Scour Remediation Log** is included with this SPPP. If and when scour is identified at an outfall pipe, the location will be added to the Log. A proposed schedule for when the repairs may be completed will be included.*

*Embankment erosion downstream of outfall 17OUT03 & 17OUT04 was identified in **2006**.
Although this occurred prior to Section 2 inspections, the remediation was included on the Remediation Log.*

*Embankment erosion adjacent to an outfall behind Avignon development was found in January **2008**. The erosion was not caused by the outfall but was remediated and is included on the Remediation Log.*

SPPP Form 9 – Outfall Pipe Stream Scour Inspection and Control

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

*A project to stabilize 400 ft. of a stream embankment was completed in **2011** at the Pennsauken CC. The erosion was not the direct result of scour due to an outfall, nor was it on property operated by the municipality. However, the extent of erosion and siltation of the tributary to the Pennsauken Creek was significant. The remediation effort is an indication of efforts by the Township and the Pennsauken CC to correct an erosion problem and has been included on the Remediation Log.*

*Embankment erosion / scour was found at 17OUT10 in March **2010**. The remediation project was completed in 2013 and is included on the Remediation Log.*

*In **2012**, as part of the Crescent Field Improvement Project, Outfalls 12OUT01, 12OUT03 and 12 OUT04 were reconstructed with new headwalls. Minor stream scour was remediated.*

*In **2016**, as part of the Meadowbrook Park Improvement Project, scour/erosion at Outfall 9OUT03 was identified and remediated. The location has been included on the Remediation Log.*

January 2018 Permit Renewal

The January 2018 permit renewal modifies the SBR for outfall pipe stream scour.

Tier A Municipalities shall develop, update and implement a program to detect, investigate and control any localized stream scouring from stormwater outfall pipes owned or operated by the municipality. The Tier A Municipality shall, at a minimum: (Note: refer to permit IV.B.6.B for complete permit requirements)

- Inspect each outfall pipe which discharges to a stream for localized stream scouring in the vicinity of the outfall pipe. Each outfall pipe shall be **inspected at least once every five (5) years**.
- When localized stream scouring is detected, refer to Permit Section IV.B.6.b and the Tier A Guidance Document for the requirements on prioritizing, scheduling and completing the remediation of any scour in the vicinity of the outfall pipe.
- Maintain a Log of indicating the ID number and location of outfall pipes inspected. The Log shall indicate any repairs required, scheduled, and completed.

The January 2018 permit includes the definition of “stream scouring” to mean the erosion or removal of streambed or bank material by the physical action of flowing water and the sediment that it carries. (Tidal erosion is not considered stream scour).

*An **Outfall Pipe Stream Scour Inspection Log** is attached to this SPPP. All outfall pipes will be inspected within the next 5 years during the period Jan 2018 – Dec 2022. As the inspections are performed, the dates will be included on the Inspection Log. Any scour found will be added to the Remediation Log.*

SPPP Form 10 – Ordinances

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

PET WASTE ORDINANCE

Statewide Basic Requirement

Tier A Municipalities shall adopt and enforce an ordinance that requires pet owners or their keepers to immediately and properly dispose of their pet's solid waste deposited on any property, public or private, not owned or possessed by that person. Information on the Pet Waste Ordinance and the benefits of proper disposal of pet solid waste shall be distributed with pet licenses.

*Pennsauken Township has an existing ordinance requiring the cleanup of dog waste. **Ordinance No. 78-38** was adopted 12-27-78. Township Code Section 101-15.D was reviewed and determined to adequately address the requirements of this SBR. Section 101-15.D includes the requirement to dispose of pet solid waste.*

The informational brochure provided by the NJDEP is being distributed by the Township Clerk when pet licenses are issued or renewed.

In addition, the pet waste information brochure was published in the May 2006 issue of All Around Pennsauken. A followup article was published in the January 2008 edition of All Around Pennsauken specifically referencing Ordinance 101.15.D.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

WILDLIFE FEEDING ORDINANCE

Statewide Basic Requirement

Tier A Municipalities shall adopt and enforce an ordinance that prohibits the feeding of any wildlife (i.e., geese) in any public park or on any other property owned or operated by the Tier A Municipality.

***Ordinance 2005-24** amending Township Code Chapter 101, Animals, was adopted 9-28-05 to include wildlife feeding on public property. Reference Article III, Section 101-23.D*

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

LITTER ORDINANCE

Statewide Basic Requirement

Tier A Municipalities shall adopt and enforce a litter ordinance or enforce the existing State litter statute (N.J.S.A. 13:1E-99.3)

*Pennsauken Township has an existing ordinance against littering. **Ordinance No. 88-37** was adopted 9-14-88. Township Code Chapter 197, Littering was reviewed and determined to essentially duplicate the sample MSRP Ordinance and is therefore adequate to address the requirements of this SBR.*

Periodic articles have been published in the Township newspaper, All Around Pennsauken highlighting the connection between littering and stormwater pollution.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

IMPROPER DISPOSAL OF WASTE ORDINANCE

Statewide Basic Requirement

Tier A Municipalities shall adopt and enforce an ordinance prohibiting the improper spilling, dumping, or disposal of materials other than stormwater into the municipal separate storm sewer system, excluding those discharges as allowable under Part II.C.2.b of the General Permit).

Ordinance 2005-22 amending Township Code Chapter 256, Sewers and Drainage Systems was adopted 9-28-05.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

YARD WASTE ORDINANCE

Statewide Basic Requirement

Tier A Municipalities shall **either** adopt and enforce an ordinance that prohibits placing non-containerized yard waste (i.e., leaves and grass clippings) in the cartway of the street **or** shall develop a yard waste collection and disposal program. A yard waste collection program shall include the adoption and enforcement of an ordinance prohibiting all yard waste from being placed within the cartway more than seven (7) days prior to scheduled collection or the placing of yard waste closer than 10 feet from any storm sewer inlet along the street unless they are bagged or otherwise containerized. The frequency of pickups shall be at the discretion of the Tier A Municipality. Any area which the municipality determines to have no yard waste will be exempt from the collections.

Either option described in the SBR requires the adoption of an ordinance. The Township already has a yard waste collection program in place. The Township conducts a weekly yard waste collection of containerized yard waste and bundled or tied yard trimmings in those areas where yard waste is likely to be generated. There are numerous industrial parks in the Township where yard waste is not generated and collections are not performed. The weekly collection is conducted all year and is performed by the waste hauler under contract to the Township).

Ordinance 2005-25 amending Township Code Chapter 269, Solid Waste was adopted 9-28-05.

During the period late-October to the end of December, loose leaves are collected by the Dept. of Public Works. Leaves collected by the Pennsauken DPW are taken to the Township Leaf Compost Site to be composted. This site is regulated under N.J.A.C. 7:26A-1.4(a)14. Bagged or containerized leaves are still picked up every Wednesday by the Township's waste hauler during leaf collection season. Residents are encouraged annually to bag or place their leaves in trash containers for pickup. Notification is by way of the Public Works Dept. All Around Pennsauken newspaper

The Township does not publish a schedule for leaf collection during the Fall season. This was done in years past and, in the opinion of the Public Works Dept. created more problems. Weather, manpower, and equipment problems often caused the schedule to be delayed and generated numerous complaints. It also undermined the credibility of a published schedule. The Township also believes that residents will rake or blow their leaves to the street when it is convenient for them regardless of when the Public Works Dept. moves into an area. The Public Works Dept. has met with more success simply moving methodically through the Township and targeting known areas where leaf drop is especially heavy. All areas are cleared at least twice during the 8-10 week period.

March 2009 Permit Renewal

The permit renewal deleted the seven (7) day restriction on placement of yard waste in the street.

Ordinance 2010-03 was adopted 4-21-03 to eliminate the 7 day restriction on placement of yard waste in the street prior to collection.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

ILLICIT CONNECTIONS PROHIBITED ORDINANCE

Statewide Basic Requirement

Tier A Municipality shall, to the extent allowable under State law, prohibit through ordinance, illicit connections to the Tier A Municipality's storm sewer system, and implement appropriate enforcement procedures and actions.

Ordinance 2005-23 amending Township Code Chapter 256, Sewers and Drainage Systems was adopted 9-28-05.

The Township's Illicit Connection Elimination Program is described in **SPPP Forms 7**. SPPP Form 10 simply references the adoption of Ordinances 2005-23.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

PRIVATE STORM DRAIN INLET RETROFITTING ORDINANCE

Statewide Basic Requirement

NOTE: This is a new requirement added as part of the **March 2009** permit renewal. Adoption and enforcement is required by September 1, 2010.

Tier A Municipalities shall adopt and enforce an ordinance requiring the retrofitting of existing storm drain inlets to meet the standard in Attachment C of the permit which are in direct contact with repaving, repairing (excluding repair of individual potholes), reconstruction, resurfacing (including top coating or chip sealing with asphalt emulsion or a thin base of hot bitumen), or alterations of facilities on property not owned or operated by the municipality (except individual single family homes).

Ordinance 2010-07 amending Township Code Chapter 256, Sewers and Drainage Systems was amended April 21, 2010..

*Any repaving, reconstruction, resurfacing, etc. in connection with a development or redevelopment project that requires review by either the Planning Board or Zoning Board, the retrofitting requirement is specified as part of that review. Projects that meet the definition of major development also require installation or retrofitting of storm inlets and are included with **SPPP Form 3**.*

There are repaving, resurfacing, seal coating projects performed where review and approval by the Planning or Zoning Board is not required. The work may or may not require a permit from the Construction Dept. If a permit is not specifically required for the paving activity, the need for retrofitting is identified through other routine departmental inspections or by drive-by inspection.

*The **Storm Drain Inlet Retrofit Log (Private)** is included with SPPP Form 11 – Inlet Retrofitting.*

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

SPPP Form 10 – Ordinances (con't.)

REFUSE CONTAINER / DUMPSTER ORDINANCE

Statewide Basic Requirement

NOTE: This is a new requirement added as part of the **March 2009** permit renewal.

Ordinance 2010-08 amending Township Code Chapter 269, Solid Waste was adopted April 21, 2010.

January 2018 Permit Renewal

The January 2018 permit renewal removed the adoption and enforcement of this ordinance from a requirement to an **Optional Measure**. See "Optional Measures" elsewhere in this SPPP.

Enforcement of Ordinances

In general, enforcement of the various ordinances falls on the Stormwater Ccoordinator, Public Works Dept. or the Property Maintenance Dept. (formerly Code Enforcement Dept.).

Typically, warnings would be issued first followed by violations. However, it would depend on the ordinance being violated. Issues are handled case-by-case. In some cases, for violations under the Property Maintenance Code, court tickets are issued.

Periodically, articles are published in All Around Pennsauken dealing with pet waste, littering, dumping of anything into a storm drain, etc. These supplement the annual Public Education publications required by SPPP Form 4.

The guidance provided by the NJDEP per email November 22, 2010 was essentially already being followed. Ordinances associated with the MSRP are enforced within the framework of the existing municipal inspection activities. Property maintenance inspections, vacant property inspections, storm drain inlet inspections, resident & business complaints and routine drive-by inspections by the Construction Official, Public Works personnel, and the Township Engineer insure, for the most part, that any activities in violation of stormwater ordinances are identified and dealt with appropriately.

SPPP Form 11 – Storm Drain Inlet Retrofitting

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Retrofitting of existing storm drain inlets to meet the standard contained in Attachment C of the permit is required where such inlets are in direct contact with repaving, repairing (excluding repair of potholes), reconstruction or alteration of facilities owned or operated by the Tier A Municipality. Projects that were awarded or began construction prior to March 3, 2004 are exempted from this requirement.

Pennsauken Township uses the NJDOT bicycle safe grate style for most storm inlets. The Township had already been retrofitting grates with the bicycle safe style prior to the MSRP Permit requirement. For the curb-opening casting (hood piece), the Township will either replace the entire casting with one that meets the requirements of Attachment C or will retrofit the existing casting with a bar attachment that reduces the opening size so as to meet the requirements of Attachment C.

The Township is not claiming any alternative device exemption or any historic place exemption as of this revision of the SPPP. The Township will claim a hydraulic performance exemption on a case-by-case basis, primarily in areas of known flooding. The Township will consider, on a case-by-case basis, adding additional inlet(s) at a known flood location to compensate for loss of hydraulic efficiency so as not to exacerbate existing flooding conditions.

A Storm Drain Inlet Retrofit Log for projects awarded after March 3, 2004 is included with this SPPP.

March 2009 Permit Renewal

The permit renewal added the requirement that retrofitting of storm drain inlets must be done when in direct contact with resurfacing (including top coating or chip sealing with asphalt emulsion or a thin base of hot bitumen).

The permit renewal also added the requirement that Tier A Municipalities must maintain records including the number and location of storm drain inlets retrofitted and the number and locations of storm drains exempted.

*The March 2009 requirement to maintain records for the number & locations of storm drains retrofitted was already being done. See the **Storm Drain Inlet Retrofit Log (Township)** included with this SPPP.*

NOTE: *The March 2009 permit required the Municipality to adopt an Ordinance for the retrofitting of storm drain inlets **not** owned or operated by the Municipality when in direct contact with a resurfacing project. See SPPP Form 10 for said Ordinance.*

*A **Storm Drain Inlet Retrofit Log (Private)** is included with this SPPP and applies to storm drain inlets not owned or operated by the Municipality.*

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018

SPPP Form 12 – Street Sweeping

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipalities shall sweep, at a minimum of once per month, all streets that meet the following criteria:

- Street is owned or operated by the municipality.
- Street is curbed and has storm drains.
- Street has a posted speed limit of 35 mph or less.
- Street is not an entrance or exit ramp.
- Street is in a predominantly commercial area.

*There are **no** streets in the Township that meet **all** of the criteria of the Statewide Basic Requirement, therefore the Township is **not required** to sweep streets or report the amount of debris collected. All streets in commercial areas are under the jurisdiction of the Camden County Highway Dept. or the NJDOT.*

However, the Township does, in fact, perform street sweeping. The Township will maintain its existing street sweeping schedule and will continue to sweep all municipally owned residential streets multiple times in a year, as weather conditions and manpower permit. The Township has no shared service agreement for street sweeping.

*At the June 12, 2008 NJDEP Compliance Evaluation, the Township agreed to **voluntarily** record the approximate amount of debris collected & disposed of starting June 2008. The inspector acknowledged that there are no streets that are required by permit to be swept and therefore, no requirement to maintain records; however, the Township will report the amount of debris, if available, for the months when sweeping is performed.*

For the period March 2008 to October 2008, the Public Works Dept. estimates 400 tons of debris were taken to the Landfill. This averages out to 50 tons per month for the 8 months sweeping is done. No sweeping was performed for the 4 months November to February.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

For the period March 2009 to October 2009, the Public Works Dept. reported 522 tons of debris were taken to the Landfill. This averages out to 65 tons per month for the 8 months sweeping is done. No sweeping was performed for the 4 months November to February.

For the period March 2010 to October 2010, the Public Works Dept. reported 445 tons of debris were taken to the Landfill. This averages out to 55 tons per month for the 8 months sweeping is done. No sweeping is performed for the 4 months November to February.

For the period March 2011 to October 2011, the Public Works Dept. reported 609 tons of debris were taken to the Landfill. This averages out to 76 tons per month for the 8 months sweeping is done. Due to the mild winter with little to no snow, some sweeping was done in Jan & Feb. 2011.

SPPP Form 12 – Street Sweeping

For the period March 2011 to October 2011, the Public Works Dept. reported 609 tons of debris were taken to the Landfill. This averages out to 76 tons per month for the 8 months sweeping is done. Due to the mild winter with little to no snow, some sweeping was done in Jan & Feb. 2011.

For the period March 2012 to October 2012, the Public Works Dept. reported 624 tons of debris were taken to the Landfill. This averages out to 78 tons per month for the 8 months sweeping is done. For the 2nd year, due to the mild winter & little snow, some sweeping was done in Jan & Feb of 2012.

For the period March 2013 to October 2013, the Public Works Dept. reported 239 tons of debris were taken to the Landfill. This averages out to approx. 30 tons per month for the 8 months sweeping is done. Tonnage notably less than 2 previous years. This is attributed to sweeper mechanical problems and manpower shortage requiring reassignment.

For the period March 2014 to October 2014, the Public Works Dept. reported 508 tons of debris were taken to the Landfill. This averages out to approx. 63.5 tons per month for the 8 months sweeping is done.

For the period March 2015 to October 2015, the Public Works Dept. reported 544 tons of debris were taken to the Landfill. This averages out to approx. 68 tons per month for the 8 months sweeping is done.

NOTE: In 2015, the Township entered into a Shared Services Agreement with the Borough of Merchantville to sweep certain streets at specific times of the year. A copy of the Agreement is included with this SPPP. It is NOT an Agreement to sweep all streets in Merchantville Borough. It also has a term of 5 years from March 1, 2015 to February 29, 2020. Total amount of material swept is too small to separate out and is included in the totals for Pennsauken Township.

For the period March 2016 to October 2016, the Public Works Dept. reported 490.5 tons of debris were taken to the Landfill. This averages out to approx. 61 tons per month for the 8 months sweeping is done.

NOTE: In 2016, the Public Works Dept. changed the way street sweepings are handled as a result of the NJDEP not allowing temporary stockpiling of the sweepings at the leaf compost site storage bin. Instead of individual dump truck slips being provided to Public Works by the Landfill, a 20 yd. dumpster is provided by Waste Management at the leaf compost site at 8850 Park Ave. Street sweepings are placed directly in the dumpster. Waste Management did not always provide tonnage for each dumpster, which was picked up multiple times a month. Tonnage was estimated.

For the year 2017, Waste Management provided a monthly tonnage report based on the number of times the 20 yd. dumpster was removed from the leaf compost site. Total for 2017 = 446 tons.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

The January 2018 permit renewal did not change the statewide basic requirement for street sweeping but it is now considered a Community Wide Measure under Good Housekeeping Practices. For purposes of the SPPP, Form 12 will be maintained to document activities regarding street sweeping in the Township.

The statewide basic requirement remains the same in that the Township has no streets that meet all the criteria for required street sweeping. However, the Township does sweep streets on a regular basis and will continue to report the annual tonnage of material collected.

SPPP Form 12 – Street Sweeping

In summary, there are approximately 102 miles of streets under Township jurisdiction. It is estimated that the Township sweeps approximately 75% of those on a regular basis (estimated at 75 miles). The Township does not sweep streets in industrial parks. Typically, sweeping is limited to the months March through October depending on weather conditions during the winter months. Leaf collection is occurring in November & December.

Although it is a Camden County jurisdiction street, the Township sweeps Westfield Ave. for its full length weekly. A distance of 2 miles. Westfield Ave. is the main commercial district in the Township. There is no shared services agreement with the County. The Township simply does it. The material collected is included in the total annual tonnage reported for the Township.

The Township continues its shared services agreement with Merchantville Borough to sweep certain streets at specific times of the year. The Agreement is due to expire February 29, 2020. The material collected is included in the total annual tonnage reported for the Township.

For the year 2018, Waste Management provided a monthly tonnage report based on the number of times the dumpster was removed from the leaf compost site. Total for 2018 = 628 tons.

SPPP Form 13 – Storm Drain Inlet Inspection & Cleaning

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipalities shall develop and implement a stormwater facility maintenance program for cleaning and maintenance of all stormwater facilities operated by the Tier A Municipality.

Stormwater facilities include, but are not limited to: catch basins, detention basins, filter strips, riparian buffers, infiltration trenches, sand filters, constructed wetlands, wet basins, bioretention systems, flow bypasses, and stormwater conveyances.

The stormwater facility maintenance must be performed as required to ensure the proper function and operation of the stormwater facility. Tier A Municipalities shall also clean all catch basins annually to remove accumulated sediment, trash, and debris.

Tier A Municipalities shall maintain records of inspections, maintenance and repairs that are performed to stormwater facilities.

The Township Public Works Dept. uses their jet-vac truck to clean catch basins (inlets). Public Works typically prioritizes cleaning of inlets in flood-prone areas first and then moves to areas less prone to flooding, if necessary. Some flood-prone areas are cleaned multiple times a year. Some inlets are checked but not cleaned because they are clean at the time of inspection.

In 2005 & 2006, despite the best effort of the Public Works Dept., it was determined that the number of inlets throughout the Township was too numerous to clean every inlet every year. This was brought to the attention of NJDEP Compliance & Enforcement at the annual Compliance Evaluation & Inspection on March 22, 2007. It was proposed that since the Township has already been divided into 2 sections for inlet labeling that the inlets in Section 1 be cleaned in 1 year and the inlets in Section 2 be cleaned the 2nd year. Thus within 2 years all the inlets in the Township will be cleaned.

Section 1 inlets were cleaned in 2007. Section 2 inlets were cleaned in 2008. At the NJDEP Compliance Evaluation & Inspection on June 12, 2008, Township was instructed to inspect all inlets each year and clean only those needed.

The Township owns and operates stormwater inlets, detention basins, open drainage ditches, and creeks (streams). The detention basins and drainage ditches are presently, and will continue to be, maintained by way of grass cutting and debris removal on an ongoing, as-needed basis to assure proper function.

As the Public Works crew cleans inlets and maintains detention basins, any maintenance item that requires further attention is brought to the attention of the Public Works Supervisor. The Department does the necessary repair or, if more extensive work is needed, provides the location to the Engineering Dept. for additional project consideration.

*The most common problems with the stormwater facilities are damaged or failed inlets which require repair or reconstruction and sinkholes due to defective storm sewers. When found, these problems are brought to the attention of the Engineering Dept. The attached **Stormwater Facilities Maintenance Log** lists repairs / reconstruction of the stormwater facilities.*

SPPP Form 13 – Storm Drain Inlet Inspection & Cleaning

March 2009 Permit Renewal

The March 2009 permit renewal did not change the SBR as far as Stormwater Facility Maintenance. The permit did separate Stormwater Facility Maintenance and Catch Basin Inspection and Cleaning into separate permit requirements. However, both are addressed in SPPP Form 13 as Stormwater Facility Maintenance.

For Catch Basin Inspection and Cleaning, the SBR requires that the Tier A Municipality shall inspect all municipally owned and operated catch basins for accumulated sediment, trash and debris and clean as needed. Tier A Municipalities with less than 5000 catch basins shall annually inspect and, as needed, clean 1000 catch basins (or as many as the municipality owns and operates).

There was no change to this SBR in the March 2009 permit renewal as regards Stormwater Facilities Maintenance..

A training session was conducted March 23, 2009 with Public Works Dept. supervision and inlet cleaning crew in advance of starting 2009 work. The Township inlet count is below 5000 & therefore, the Township is to inspect 1000 inlets and clean as needed. The new requirements were discussed and a new recording form was provided that also includes a checkoff for confirmation of inlet labeling.

In 2009 & 2010, the Public Works Dept. inspected all storm inlets & performed cleaning as necessary. The new forms were used to document the areas inspected/cleaned. Also, labels noted by the crew as missing were included on the form and labels were reattached.

In 2011, the Public Works Dept. inspected all storm inlets & performed cleaning as necessary. Inspection forms were completed. Labels noted as missing were reattached. The PW Dept. reported that 231 inlets were cleaned.

*In 2012, a complete inspection of all inlets in all 17 areas of the Township was performed by both the Township Engineer and the Public Works Dept. Area-specific inspection forms were created with specific locations of all inlets under municipal jurisdiction. The total number of inlets under Township jurisdiction has been established at **1403**. All inlets were confirmed labelled.*

During this inspection, the number of inlets that were judged to require cleaning was confirmed to be a small % of the total. In 2012, 194 inlets were cleaned and 51 cu. yd. of debris was disposed of. Conclusion is that the permit requirement to inspect and clean inlets each year has resulted in more frequent cleaning over the last 6 to 7 years and therefore, the need to clean is less. In addition, historically "problem" inlets have been identified and are cleaned annually.

In 2013, all storm inlets were inspected by PW crew. Inlets judged needing cleaning were either cleaned at that time or noted for future cleaning (which was done as time & manpower permitted). All inlets needing cleaning were done. PW Dept. reported cleaning 162 inlets and disposing of 31 cu.yd. of debris.

In 2014, Public Works Dept. inspected all storm inlets and reported cleaning 109 inlets and disposing of 26 cu. yds. of debris. During their inspection, any missing labels were replaced. Random inlets were cleaned on an as-needed basis as identified during rainstorms.

In 2015, Public Works Dept. inspected all storm inlets and reported cleaning 130 inlets and disposing of 26 cu. yds. of debris. During their inspection, any missing labels were replaced.

In 2016, Public Works Dept. inspected all storm inlets and reported cleaning 120 inlets and disposing of 25 cu. yds. of debris. During their inspection, any missing labels were replaced.

SPPP Form 13 – Storm Drain Inlet Inspection & Cleaning

*In 2017, the Public Works Dept. inspected all storm inlets and reported cleaning 129 inlets and disposing of 18 cu. yds. of debris. During their inspection, any missing labels were replaced and all inlets are confirmed labelled. As in previous years, inlets requiring repair or reconstruction were also identified and a list provided to the Township Engineer. Repairs completed are listed on the **Stormwater Facilities Maintenance Log**.*

January 2018 Permit Renewal

The March 2009 permit renewal separated Catch Basin and Storm Drain Inlet Inspection and Cleaning and Stormwater Facilities Maintenance as separate permit requirements. However, at that time in 2009, SPPP Form 13 continued to be used to report both subjects.

The January 2018 permit renewal now includes Catch Basin and Storm Drain Inlet Inspection and Cleaning as a Community Wide Measure and Stormwater Facilities Maintenance (other than storm drain inlets) is included in the new permit as Other Control Measures.

The statewide basic requirements dealing with both subjects have been revised and expanded to the point that the decision was made to separate the requirements into their own SPPP Forms.

SPPP Form 13 has been renamed **Storm Drain Inlet Inspection & Cleaning** and addresses only storm drain inlets. **SPPP Form 18** has been created and entitled **Stormwater Facilities Maintenance**.

The SBR for storm drain inlets has been modified to require the Municipality to inspect storm drain inlets and any associated catch basins that it owns and operates and remove sediment, trash and debris when present. **Each catch basin and inlet shall be inspected at least once every 5 years.** The Municipality shall clean any municipally owned or operated storm drain inlet or catch basin as frequently as necessary to eliminate recurring problems and restore proper function.

All storm drain inlets were inspected and cleaned, as needed, in 2017. The requirement that all inlets be inspected within a 5 year period (2018-2023) will be met. A project to as-build the storm sewer system throughout the Township is planned for 2020-2021. Every inlet will be inspected and documented as part of that effort. Inlets requiring cleaning will be identified for future cleaning by the Public Works Dept.

In 2018, Public Works cleaned storm inlets on an as needed basis, primarily in response to complaints or as identified during rain/flood events. An estimated 90 inlets were cleaned and an estimated 15 CY of debris were disposed of. Inspection and maintenance of stormwater facilities other than inlets was performed in 2018. The list is now included with SPPP Form 18.

The Stormwater Facility Maintenance Log that was created in 2005 will continue to be updated as part of SPPP 13 to document repairs and reconstruction of storm drain inlets and storm sewers only. Maintenance of stormwater facilities other than storm drain inlets will be addressed in SPPP Form 18.

SPPP Form 14 – De-icing Material Storage

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipalities must construct a permanent structure for the storage of salt and other de-icing materials. Once completed, Tier A Municipalities shall perform regular maintenance and inspections of the permanent structure. Seasonal tarping may be used as an interim BMP until a permanent structure is completed. Sand may be stored outside and uncovered if a 50 ft. setback is maintained from storm sewer inlets, ditches or other stormwater conveyance channels, and surface water bodies.

Prior to 2015, the Township utilized the former Abarry Steel building on Cove Rd. for storing salt. It was a completely enclosed, permanent structure that met the requirements of the SBR. The building was owned by the Township. It was demolished in 2016.

In 2015, a new salt storage building was constructed at the Public Works Dept. complex. The new building is fully MSRP compliant. No de-icing material is stored outside. For approximately 9 months of the year, the salt storage building is closed as it is a single use facility. Depending on winter conditions, it may not be used at all.

March 2009 Permit Renewal

There is no change to this SBR as a result of permit renewal March 2009.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

However, the permit no longer identifies it as a separate SBR with a separate SPPP Form but has included Salt & De-icing Material Storage and Handling as a Best Management Practice (BMP) under Municipal Maintenance Yard and Other Ancillary Operations. The Township remains in compliance with the SBR.

The Storage and Handling of Salt and De-icing Material is a topic addressed in the Best Management Practices contained in Attachment E of the January 2018 permit renewal. The Standard Operating Procedure (SOP) for Good Housekeeping at the Municipal Maintenance Yard (SPPP 16) has been revised to include the BMP for the storage and handling of salt, sand and de-icing materials.

SPPP Form 15 – Equipment & Vehicle Washing

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipalities shall manage any equipment and vehicle washing activities so that there are no unpermitted discharges of wash wastewater to the surface or ground waters of the State.

Tier A Municipalities shall maintain a record of where and when equipment and vehicle washing occurs to document proper management of wash water discharge.

Tier A Municipalities shall certify annually that there is no unpermitted discharge from washing activities and describe the BMP implemented at each of the locations where vehicle and equipment washing activities occur.

Vehicle and equipment washing occurs at the Public Works / Highway garage. Small trucks are washed inside the garage and wastewater discharges to the sanitary sewer. Heavy trucks are washed outdoors at an adjacent garage. Wash wastewater is collected in the garage yard behind a hay bale filter and the water is allowed to seep through the bales or evaporate. There is no unpermitted discharge of wash wastewater from the site to either a surface water body or groundwater. The closest storm drain inlet to the point that runoff leaves the garage site is approximately 700 ft.

March 2009 Permit Renewal

The March 2009 permit renewal did not essentially change the existing SBR. SPPP Form 15 was initiated following the March 2009 permit renewal to address Equipment and Vehicle Washing as a separate Statewide Basic Requirement.

The initial permit authorized existing discharges of equipment and vehicle wash water from municipal maintenance yard operations until February 28, 2009.

As of 2010, ALL vehicles are washed inside the garage. Wastewater drains to sanitary sewer system. During the inspection of Public Works facility by the NJDEP during the Compliance Evaluation and Assistance Inspection on April 27, 2011, the inspector observed Public Works Dept. personnel washing of pickup truck inside the garage.

January 2018 Permit Renewal

There is no change to this SBR as a result of permit renewal January 2018.

However, it no longer needs to be identified as a separate SBR with a separate SPPP Form. The January 2018 permit renewal has included Onsite Equipment and Vehicle Washing and Wash Wastewater Containment as a Best Management Practice (BMP) under Municipal Maintenance Yard and Other Ancillary Operations. The Township remains in compliance with the SBR.

The Best Management Practices contained in Attachment E of the January 2018 permit renewal as regards equipment & vehicle washing & wastewater containment have been incorporated into SPPP Form 16 – Good Housekeeping Practices for Municipal Maintenance Yards.

SPPP Form 16 – Municipal Maintenance Yard BMP

Municipality Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

The permit requirement regarding Maintenance Yard Operations included 5 topics all addressing activities at the municipal maintenance yard and any ancillary facilities. The topics addressed in the permit are:

- De-icing Material Storage
- Equipment and Vehicle Washing
- Fueling Operations
- Vehicle Maintenance
- Good Housekeeping Practices

Attachment D to the permit addressed required practices for Fueling Operations, Vehicle Maintenance and Good Housekeeping. Attachment D also requires an inventory of all materials and machinery located at the Maintenance Yard and any ancillary operation be created and included in the SPPP.

The SBR for De-icing Material Storage is addressed in a separate SPPP Form 14.

The SBR for Equipment and Vehicle Washing is addressed in a separate SPPP Form 15.

Three (3) Standard Operating Procedures (SOP) were prepared for Fueling Operations, Vehicle Maintenance, and Good Housekeeping. All 3 SOPs were effective April 1, 2006.

The Municipal Maintenance Yard for Pennsauken Township is the Public Works / Highway Dept. Facility located at 6725 Wayne Ave. Fueling, vehicle maintenance and vehicle washing is done at this facility. The only ancillary facility under the jurisdiction of the Public Works Dept. is the Leaf Compost Site located at 8850 Park Ave.

An Inventory has been created for both the Public Works / Highway Dept. facility and the Leaf Compost facility. Both are attached to the SPPP.

*An inspection of the Public Works Facility was conducted by the NJDEP in **May 2006**. No problem found.*

*An inspection of the Public Works Facility was conducted by the NJDEP in **June 2008**. A floor drain in the vehicle repair garage was identified as an item to be addressed.*

SPPP 16 – Municipal Maintenance Yard BMP

March 2009 permit renewal

There was no change to this SBR as a result of the March 2009 permit renewal. Both the Standard Operating Procedures and the Maintenance Yard Inventory were reviewed to confirm they were still accurate.

*An inspection was performed by the Township Engineer in **June 2009**. No problem found. Confirmed that the floor drain in the vehicle repair garage was been closed off as of Sept. 2008. No liquid in the sump at the time of inspection.*

*An inspection of the fueling facility at the Public Works Garage was conducted by NJDEP in **July 2010**. No problem found.*

*A Compliance Evaluation & Assistance inspection was performed by the NJDEP in **April 2011**. No problem found.*

*An inspection of the Public Works Facility was performed by the NJDEP in **March 2017**. No problem found. A temporary diesel AST was in use at the time of the inspection. The tank was subsequently removed from the site.*

January 2018 permit renewal

The January 2018 permit renewal modified the Best Management Practices (BMPs) for Municipal Maintenance Yard & Ancillary Site Operations. It is now included as a Community Wide Measure under Good Housekeeping Practices.

The 2018 permit also increased the number of activities to be included in the Standard Operating Procedures as Best Management Practices. The 2018 permit retained the requirement for an inventory of materials and machinery. It also retained the Maintenance Yard Operation topics addressed in the 2004 permit. The topics to be addressed are:

- Fueling Operations
- Discharge of Stormwater from Secondary Containment
- Vehicle Maintenance
- Onsite Vehicle and Equipment Washing and Wastewater Containment
- Salt and De-icing Material Storage and Handling
- Aggregate Material and Construction Debris Storage
- Street Sweepings; Catch Basin Cleanout; and other Material Storage
- Yard Trimmings and Wood Waste Management Site
- Roadside Vegetation Management

The Tier A Municipality shall implement the BMPs contained in Attachment E at municipal maintenance yards and ancillary operations owned or operated by the municipality. The Inventory shall include all materials and machinery that could be a source of pollutants in a stormwater discharge.

Compliance with this Statewide Basic Requirement will be as described herein. A copy of Attachment E from the January 2018 permit is included with this SPPP. It supersedes Attachment D from the 2004 permit.

Inventory

*The Inventory created on initial issue of the permit for both the Public Works / Highway Dept. Facility and the ancillary Leaf Compost Site has been reviewed, updated, and is included in the **SPPP as Form 16.1**. Periodic review and updating will be done as necessary.*

SPPP 16 – Municipal Maintenance Yard BMP

Procedures

Two (2) Standard Operating Procedures (SOPs) have been prepared to incorporate the Best Management Practices contained in Attachment E.

SPPP Form 16.2 – Good Housekeeping Practices

This SOP addresses all topics except vehicle maintenance and fueling.

SPPP Form 16.3 – Vehicle Maintenance and Fueling Practices

This SOP addresses vehicle maintenance and fueling only.

Inspections

Attachment E requires monthly site inspections to identify conditions that could contribute to stormwater contamination, illicit discharges, or negative impacts to the Tier A Municipality's MS4. It further requires an Inspection Log containing the dates of inspections, the name of the inspector and any relevant findings. The Log must be kept with the SPPP and made available to the NJDEP on request.

The Inspection Log is included with this SPPP Form 16. At present, inspections are performed by the Stormwater Program Coordinator / Township Engineer. In the event the inspections are turned over to the Public Works supervision, the Log will be maintained at the Public Works Facility.

The Township will not conduct monthly inspections as it is not considered necessary. The day-to-day operation of the Public Works Facility does not change in terms of storing materials that could possibly impact the MS4 or groundwater. The history of facility inspections since the initial 2004 permit supports this position as no problems or violations have been found in any inspection. Quarterly inspections will be performed and documented.

SPPP Form 17 – Employee Training

Municipality Information

Municipality: Pennsauken Township County Camden
 NJPDES # : NJG01418989 PI ID #: 207740
 Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18
 Date of most recent update: Dec 2018

Statewide Basic Requirement – March 2004 Permit

Tier A Municipalities shall develop and conduct an annual employee training program for appropriate employees on appropriate topics. At a minimum, annual employee training will include the following topics:

- Waste Disposal Education
- Yard Waste Collection Program (if applicable)
- Municipal Ordinances
- Street Sweeping
- Illicit Connection Elimination and Outfall Pipe Mapping
- Road Erosion Control and Outfall Pipe Scouring Remediation
- Stormwater Facility Maintenance
- Maintenance Yard Operations
- Construction Activity / Post-Construction Stormwater Management In New Development and Redevelopment

On the initial issue of the permit, the Township Engineer was assigned the responsibility of Stormwater Program Coordinator and, as a result, was most familiar with the requirements of the MSRP. Training was performed by meeting with various departments and educating the personnel on the MSRP Program overall and on those topics appropriate to their job title and duties.

Specific topics (e.g., outfall pipe mapping and scour remediation; illicit connection investigation) are being addressed by the Engineering Dept. and training of other personnel is not considered necessary.

Training sessions were held for:

- *Public Works Dept. personnel.*
- *Township Administration*
- *Mayor & Members of Township Committee*
- *Planning & Zoning Dept.*
- *Construction & Code Enforcement (subsequently Property Maintenance).*

The Township Engineer/Stormwater Coordinator also attended training sessions when offered by the NJDEP.

Training was conducted March 21, 2006 with Construction Dept., Code Enforcement and Planning & Zoning personnel to inform them regarding Post-Construction Stormwater Management in New Development and Redevelopment and the new Stormwater Control Ordinance. Any new major development / redevelopment would be reviewed by those depts.

Stormwater Coordinator attended the Municipal Stormwater Seminar on July 20, 2006 for Camden & Gloucester Counties given by NJDEP at Gloucester Co. DPW.

Stormwater Coordinator attended Municipal Stormwater Program workshop April 5, 2007 given at Gloucester Co. DPW.

Training was conducted December 2, 2008 for all Municipal Department Heads to inform them of the requirements of the Stormwater Program and to discuss the various Ordinances now required by the MSRP.

SPPP Form 17 – Employee Training (con't.)

March 2009 Permit Renewal

The permit renewal did not change the statewide basic requirement. The SBR equires that Tier A Municipalities conduct annual employee training to educate all municipal employees on those stormwater topics which are applicable to their job and title. The topics to be included in the annual training are essentially the same as the original permit.

Training was conducted March 23, 2009 for members of the Public Works Dept. supervision and workers involved with inlet cleaning and stormwater facility maintenance. A new Stormwater Inlet Maintenance Report form was reviewed. The form lists all known storm inlets and is to be used to facilitate annual inlet inspection and label inspection.

Training was conducted July 8, 2009 for the Mayor, Members of Township Committee and Administrator to educate them on the requirements of the MSRP permit. This was done in combination with the Local Public Education SBR.

Training was conducted April 7, 2010 for members of the Public Works Dept. supervision and workers involved with inlet cleaning & stormwater facility maintenance. The use of new forms proved successful in 2009 both for inlet cleaning & inlet labeling. Subsequent cleaning of those inlets identified during inspection was noted on the form.

Training was conducted May 5, 2011 for members of the Public Works Dept. supervision and workers involved with inlet cleaning, stormwater maintenance, and street sweeping. Since annual training has been conducted in past few years, personnel are more aware of the types of stormwater maintenance that need to be documented. Record keeping seems to be improving.

Training was conducted Dec. 12, 2012 for Property Maintenance Dept. and the Planning & Zoning Dept. Head to review Ordinances that have been adopted for the Stormwater Program. The inspectors are responsible for responding to resident & business complaints. A copy of violations issued to homeowners & businesses are included in the SPPP.

Training was conducted Dec. 3, 2013 for Municipal Dept. Heads to review Stormwater Program status and Ordinances associated with the Program. Focus was on dumpsters and storm drain inlet retrofit on private property. Property Maintenance inspectors were reminded to provide a copy of any violation issued associated with stormwater compliance.

Training was conducted Dec. 12, 2014 for Public works Dept. personnel primarily focusing on maintenance yard operations, fueling operations, vehicle washing, salt storage & handling, vehicle maintenance and general housekeeping.

Training was conducted March 23, 2015 for Public Works Dept. personnel involved with inspection, cleaning, and labeling of storm inlets and maintenance of detention basins.

Training was conducted March 14, 2016 for Public Works Dept. personnel involved with street sweeping, inspection, cleaning, and labeling of storm inlets and maintenance of detention basins. Personnel were reminded that all vehicles are to be washed inside the garage so that washwater can go down the sanitary sewer.

Training was conducted Sept. 15, 2017 with Public Works Dept. personnel regarding stormwater facilities maintenance. Training was coincident with extensive maintenance work in numerous stormwater basins.

SPPP Form 17 – Employee Training (con't.)

January 2018 Permit Renewal

The permit renewal modified the statewide basic requirement as follows:

All municipal employees shall receive training on those stormwater topics applicable to their title and duties within 3 months of commencement of duties.

Records, including sign-in sheets, dates of training, and training agenda shall be kept in the SPPP.

Training shall occur once every two (2) years, unless otherwise specified. The topics for which annual training is specified are : IV.B.5.d.v. Maintenance Yard Operations;
IV.B.5.d.viii. Stormwater Facility Maintenance;
IV.B.5.d.x. General Training re: SPPP recordkeeping requirements.

The January 2018 permit renewal lists the stormwater topics for which training is to be provided to municipal employees applicable to their job title and duties. Essentially every requirement contained in the permit is listed. As was the case upon initial permit issuance, not all municipal employees need training in all stormwater topics and some stormwater topics apply only to the Stormwater Coordinator/Engineering Dept. The three topics for which annual training is required are primarily applicable to the Public Works Dept. personnel.

Training was conducted on Dec. 6, 2018 for Public Works employees involved with stormwater activities and all new employees hired in 2018. Topics included an overview of the stormwater program; ordinances pertaining to stormwater program; maintenance of stormwater facilities; municipal yard operations; and the importance of recordkeeping.

SPPP Form 17 – Employee Training (con't.)

January 2018 Permit Renewal

Stormwater Management Design Review Training

The permit renewal added the requirement that all design engineers, municipal engineers, and other individuals that review the stormwater management design for development and redevelopment projects on behalf of the municipality shall complete the NJDEP-approved Stormwater Management Design Review Course once every five (5) years.

The Tier A Municipality is required to maintain a list of the names and dates of training program participants in the SPPP. Municipal Board and Governing Board Member Related Training

This new training requirement applies to T & M Associates as the consulting engineers for both the Planning Board and the Zoning Board. Neither the Municipal Engineer nor the Planning & Zoning Dept. Head perform stormwater management design review for development or redevelopment projects.

Doug White, P.E. of T & M Associates is the individual who performs design reviews. He completed the Stormwater Management Design Review Course on July 31, & August 1, 2018. A copy of his Certificate is attached. Certification is good until 2023.

January 2018 Permit Renewal

Municipal Board and Governing Board Member Related Training

The permit renewal added the requirement that municipal board and governing body members that review and approve applications for development and redevelopment projects complete the "Asking the Right Questions in Stormwater Review Training Tool". Current members must complete the training on or before EDPA + 6 months (**July 1, 2018**) and new members within 6 months of commencing duties.

Thereafter, those board members must review at least one of the tools offered under Post-Construction Stormwater Management once per term of service. The Tier A Municipality is required to maintain a list of the names and dates of training program participants in the SPPP. Website is www.njstormwater.org/training.htm

This new training requirement applies to members of the Planning Board and the Zoning Board only. Governing Body members do not review and approve applications for development or redevelopment projects. Although not required, the Municipal Engineer / Stormwater Program Coordinator completed the online Training Tool on February 6, 2018.

Planning board members completed the online training tool on March 27, 2018. A copy of the meeting minutes is attached listing those members who completed the training.

Zoning Board members completed the online training tool on June 6, 2018. A copy of the meeting minutes is attached listing those members who completed the training.

Annual Report Followup

Confirm new board members have/have not been appointed. If yes, confirm they have completed the training tool.

SPPP Form 18 – Stormwater Facilities Maintenance

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 1-1-18

Date of most recent update: Dec 2018

Background

This is a new SPPP Form but not a new Statewide Basic Requirement. Previously, the SBR for Stormwater Facilities Maintenance was addressed in SPPP Form 13 which included **both** catch basin inspection and cleaning and stormwater facilities maintenance.

The January 2018 permit renewal now includes Catch Basin and Storm Drain Inlet Inspection and Cleaning as a Community Wide Measure. Compliance with this SBR continues to be addressed in SPPP Form 13.

The January 2018 permit renewal now includes Stormwater Facilities Maintenance (other than storm drain inlets) as Other Control Measures. In addition, the statewide basic requirement was expanded such that a new SPPP Form 18 Stormwater Facilities Maintenance had to be created.

Statewide Basic Requirement

The Statewide Basic Requirement is essentially the same for both stormwater facilities **owned or operated by the Municipality** (Part IV.C.1.a) and those **not owned or operated by the Municipality** (Part IV.C.1.b).

In each case, the Municipality shall develop, update and implement a “program” to ensure adequate long-term cleaning, operation and maintenance of a stormwater facility.

For stormwater facilities owned or operated by the Municipality, it is all such facilities.

For stormwater facilities **not** owned or operated by the Municipality, this SBR applies to facilities constructed **after February 7, 1984**.

In each case, the Municipality shall maintain a log sufficient to demonstrate compliance with this section; including, but not limited to:

- Name & location of the stormwater facility.
- Name of inspector & date of inspection.
- Inspection results and note any maintenance required and subsequently performed.

For stormwater facilities owned or operated by the municipality, the municipality must certify annually that said stormwater facilities are functioning properly

For stormwater facilities **not** owned or operated by the municipality, the municipality shall ensure that stormwater facility maintenance is performed pursuant to any maintenance plan, or more frequently as needed to ensure the proper function and operation of the stormwater facility.

SPPP Form 18 – Stormwater Facilities Maintenance

The Township has been in compliance with this SBR as far as those stormwater facilities owned or operated by the municipality. This has been an ongoing effort since the initial issue of the MSRP permit in 2004. The Storm Drainage Facilities Log for Facilities Owned & Operated by the Township is attached to this SBR. It has been reformatted to meet the requirements of the SBR to include the Facility name and location; the date of inspection; the results of the inspection and any followup maintenance required.

The attached Stormwater Facilities Log for facilities owned and operated by the Township is included in the SPPP as required by the statewide basic requirement. However, as of January 2019, the responsibility for periodic inspection and maintenance, as needed, has been assumed by the Public Works Dept. Records are kept at that facility.

A new Log has been created for facilities not owned or operated by the Municipality. The Stormwater Facility Maintenance Log for Facilities Not Owned or Operated by the Township (i.e., Private) is also attached to this SBR.

As with the Township Facilities Log, the Stormwater Facilities Log (Private) is separated by area (1 to 17). Stormwater facilities that were constructed since the Stormwater Control Ordinance went into effect in May 2006 had, prior to the January 2018 permit renewal, been listed on the Major Development Projects List included with SPPP 3. These projects have been incorporated into the Stormwater Facilities (Private) Log. The Log includes stormwater facilities believed to have been installed since February 7, 1984.

Stormwater facilities owned & operated by another public agency (i.e., NJDOT, NJ Transit, Camden County, DRPA) are not included as private facilities. It is not the responsibility of the Municipality to assure another public agency compliance with the NJDEP.

The first part of the Township's program is to identify private facilities and perform an initial inspection. The 2nd part of the program is to confirm that maintenance is being performed by the owner. Based on the initial inspection, private stormwater facilities that do not appear to be functioning properly are planned to be addressed first. Private facilities that do appear to be maintained and functioning will be addressed as a lower priority.

The magnitude of effort needed for compliance with this statewide basic requirement is extensive. Since the Township does not have a "stormwater inspection & enforcement" department, compliance will be as quickly as possible. Followup with any private stormwater facilities needing maintenance will be addressed as time and manpower permit. This effort is expected to extend into and be completed in 2019.

SPPP Form 19 – Total Maximum Daily Load (TMDL) Info

Municipality
Information

Municipality: Pennsauken Township County Camden
NJPDES # : NJG0148989 PI ID #: 207740
Effective Date of Permit Authorization (EDPA): 1-1-18
Date of most recent update: Dec 2018

Statewide Basic Requirement

This is a new statewide basic requirement included with the January 2018 permit.

Tier A Municipalities shall annually review approved or adopted TMDL reports to identify stormwater related pollutants associated with any segment of surface water wholly or partially within or bordering the Tier A Municipality. Information is at www.nj.gov/dep/dwq/msrp-tmdl-rh.htm.

The Tier A Municipality shall use the TMDL information to:

(1) Assist in the prioritization of stormwater facility maintenance including schedules for repairs (that may be) required per IV.C.1.a.iv for Stormwater Facilities Maintenance or IV.B.6.b.iv for Stream Scour.

(2) Identify and develop strategies to address specific sources of stormwater pollutants contributing to discharges authorized under this Tier A MS4 NJPDES permit.

The Tier A Municipality shall annually update its SPPP to list information identified in items (1) and (2) above.

The interpretation of this SBR is that the Township reviews the TMDL website and, based on the information contained therein, prioritizes repairs to stormwater facilities or develops strategies to address the specific pollutants identified on the website.

The SBR presumes that there are any identified repairs required to Township stormwater facilities that would be relevant to the TMDL.

The SBR further presumes that the stormwater discharge authorized under the Township's Tier A MS4 permit are in some way contributing to, or associated with, the specific pollutants identified in the TMDL.

The Township will update the SPPP annually to list the information identified in items (1) and (2) as applicable.

The NJDEP website was accessed and printed May 7, 2018 and is included in the SPPP.

Based on the information contained in the TDML report, the Township sees no need to revise or re-prioritize the maintenance of stormwater facilities. The Township does not believe outflow from the MS4 is a contributing factor to the pollutants listed in the report.

Dumpster Ordinance – Optional Measure

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

REFUSE CONTAINER / DUMPSTER ORDINANCE

NOTE: This is a new requirement added as part of the **March 2009** permit renewal.

Tier A Municipalities shall adopt and enforce an ordinance requiring dumpsters and other refuse containers that are outdoors or exposed to stormwater to be covered at all times and which prohibits the spilling, dumping, leaking, or otherwise discharge of liquids, semi-liquids, or solids from the containers.

Excluded from this requirement are permitted temporary demolition containers, refuse containers at industrial facilities authorized to discharge stormwater under a valid NJPDES permit, litter receptacles, individual homeowner trash and recycling containers, and containers that hold large bulky items(e.g. furniture, bound carpet and padding).

Ordinance 2010-08 amending Township Code Chapter 269, Solid Waste was adopted April 21, 2010.

January 2018 Permit Renewal

The January 2018 permit renewal removed the adoption and enforcement of this ordinance from a requirement to an **Optional Measure**.

The Township has elected not to revise the Township Code to delete Ordinance 2010-08. However, enforcement is optional at the discretion of the Property Maintenance Dept.

Road Erosion Control – Optional Measure

Municipality
Information

Municipality: Pennsauken Township County Camden

NJPDES # : NJG0148989 PI ID #: 207740

Effective Date of Permit Authorization (EDPA): 4-1-04 & 3-1-09 & 1-1-18

Date of most recent update: Dec 2018

Statewide Basic Requirement

Tier A Municipalities shall develop a roadside erosion control maintenance program to identify and repair erosion along streets (including roads and highways) operated by the municipality. Tier A Municipalities are also required to regularly inspect and maintain the stability of shoulders, embankments, ditches, and soils along these streets to ensure that they are not eroding and contributing to sedimentation of receiving waters.

Describe your Road Erosion Control Maintenance Program, including inspection schedules. A list of all sites of roadside erosion and the repair technique(s) you will be using for each site should be attached to this form.

*An inspection of all streets under Township jurisdiction is conducted **annually** by the Township Engineer typically during the period November through January. The primary purpose of the inspection is to evaluate road surface quality and the need for repaving/repairs. During the inspection, uncurbed streets with the potential for erosion are also inspected. Given the urban/industrial nature of the Township, there are few locations where curbing does not exist.*

Areas of erosion existing at the time of the inspection are noted and included on the attached Erosion Control Maintenance Log. As the necessary action is taken to control the erosion, the date(s) are noted in the Log. The permit does not specify a timeframe in which the repairs need to be made.

Throughout the course of the year, random drive-by inspections are performed by the Township Engineer. Areas not noted during the annual inspection can be added to the list at any time.

March 2009 Permit Renewal

The March 2009 permit renewal changed the Road Erosion SBR to an Optional Measure.

As of the March 2009 permit renewal, Road Erosion is an Optional Measure. The annual inspections by the Township Engineer will continue since these are for road surface quality, not necessarily road erosion. If an erosion condition is identified that, in the Township Engineer's judgement needs to be addressed, it will be added to the Erosion Control Maintenance Log and addressed as time and funding permit.

January 2018 Permit Renewal

Road Erosion is not included at all in the January 2018 permit renewal.

As of the January 2018 permit renewal, Road Erosion is no longer included in the permit even as an Optional Measure. The Log will continue to be included in Optional Measures since the annual road quality inspections will continue and instances of road erosion may be identified.