Resolution No. 2015-1

Borough of Elizabethtown LANCASTER COUNTY, PENNSYLVANIA

A RESOLUTION OF THE BOROUGH OF ELIZABETHTOWN, LANCASTER COUNTY, PENNSYLVANIA, ADOPTING A STORMWATER MANAGEMENT POLICY FOR THE MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) STORMWATER MANAGEMENT PROGRAM PROMULGATED BY THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND THE DEPARTMENT OF ENVIRONMENT PROTECTION OF THE COMMONWEALTH OF PENNSYLVANIA

WHEREAS, the Borough Council of the Borough of Elizabethtown desires to adopt and implement a stormwater management policy that meets the Best Management Practices also known as minimum control measures that are required of MS4 permittees designed to reduce pollution and produce cleaner waterways;

WHEREAS, the minimum control measures are public education and outreach, public participation and involvement, illicit discharge detection and elimination, construction site runoff control, post-construction stormwater management in new development and redevelopment and pollution prevention and good housekeeping for municipal operations and maintenance; and

WHEREAS, Borough staff shall ensure compliance with permit guidelines and requirements as well as all program policies and shall provide an annual report to Borough Council of implementation activities.

NOW THEREFORE, BE AND IT IS HEREBY RESOLVED by the Borough Council of the Borough of Elizabethtown, Lancaster County, formally adopts a stormwater management policy. Adopted this $15^{\rm th}$ Day of January 2015 lawfully assembled in open session.

BE IT FURTHER, AND IT IS HEREBY RESOLVED that Borough Staff is directed to, as necessary, amend the stormwater management policy to ensure compliance with county, state and federal laws, rules and regulations.

THE BOROUGH OF ELIZABETHTOWN

ATTEST:

Roni Ryan

J. Neil Ketchum Council President

[BOROUGH SEAL]

Elizabethtown Borough MS4 Stormwater Management Policy

General

This policy, if properly implemented, will meet state and federal requirements for municipal permittees under the NPDES stormwater regulations. Best Management Practices [herein referred to as "BMPs"] must be implemented by the Borough through six minimum control measures [herein referred to "MCMs"]. These BMPs are designed to reduce and ultimately eliminate discharge of pollutants from the Borough into waterways.

Intended Outcome

The intended outcome of this policy is to protect water quality and satisfy the appropriate requirements of the federal Clean Water Act and other laws and regulations promulgated by agencies of the federal and state governments.

Mandatory Training

Each department must conduct an annual training to review the Borough's compliance with each MCM.

Record Maintenance

Each department and or facility shall record every action concerning MCMs for each year. The records will be maintained in a three-ring binder that will be divided to accommodate each MCM. The department director or supervisor will review all activities and produce a written report, at the end of the permit administration year, to Borough Council on an annual basis.

MINIMUM CONTROL MEASURES

1. PUBLIC EDUCATION AND OUTREACH BMP #1 - Information Dissemination

Borough staff will disseminate information to residents using social media, the webpage and semiannual newsletter concerning the relationship their actions have with stormwater runoff and water quality. The essential target audience is homeowners, apartment buildings, business owners, developers, educational institutions and houses of worship.

Zoning and Codes Officials will include a fact sheet on stormwater management on all permits issued after an applicant has successfully completed and submitted a permit application. The fact sheet will provide each permit holder with information regarding stormwater runoff, water quality improvement and proper housekeeping methods that residents and businesses can implement. These fact sheets will be received from The Pennsylvania Department of Environmental Protection, local watershed associations and or the United States Department of Environmental Protection Agency.

Borough staff will record when information is disseminated to residents using social media, the municipal webpage and or semiannual newsletter.

Borough staff meets periodically with developers and Homeowners Associations (HOAs) for plan preparation, plan processing and inspections. Borough staff will review important stormwater information with the developer to ensure appropriate housekeeping measures are being followed and facilities are operating correctly.

The Borough also maintains a social media account through "Facebook." Individual residents, citizens at-large and business owners with individual Facebook accounts can like the Borough's public page to receive updates posted from the Borough. The Borough will post a monthly status update relaying important reminders to the public regarding stormwater educational materials and information. The information will be provided by the Borough of Elizabethtown, watershed groups and associations, the Lancaster County Conservation District, the Chesapeake Bay Commission, the Pennsylvania Department of Environmental Protection, the United States Environmental Protection Agency and any other group serving as a conduit for water quality improvement awareness.

Matters pertaining to stormwater management, water quality and or MS-4 before the Borough's governing body and or boards and commissions will be recorded in the meeting minutes. Meeting minutes will be available for residents and the general public to review at their leisure. Borough staff will post the meeting minutes online at www.etownonline.com. The public can request copies of the meeting minutes via an Open Records request or can inspect the minutes during Borough office hours (Monday - Friday 7:30 a.m. to 4:00 p.m., except when closed due to hazardous weather and or Borough recognized holidays).

The Borough maintains a website (www.etownonline.com) that will include an attachment under the icon "Public Information" that will include the stormwater management policy and procedure under subtitle "Stormwater Management Policy." The "Public Information" page will also include links to the United States Environmental Protection Agency and the Pennsylvania Department of Environmental Protection as well as the Chesapeake Bay Commission and the Lancaster County Conservation District.

BMP #2 - Engagement in Watershed Group

The Borough will contribute to and participate in local watershed groups, including attending meetings and trainings offered by watershed association.

2. Public Involvement and Participation

BMP #1 - Utilize Public Meetings to Solicit Public Participation
The Borough will utilize Borough Council and Planning Commission
meetings to solicit participation and input from the public on
stormwater management plans, subdivision and land development
plans and revisions to the stormwater management ordinance.
Matters pertaining to stormwater management, water quality and or
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inspect the minutes during Borough office hours (Monday - Friday
7:30 a.m. to 4:00 p.m., except when closed due to hazardous
weather and or Borough recognized holidays).

Borough Council will provide water shed groups and or associations an opportunity to attend a duly advertised public meeting to provide a presentation on water pollution reduction measures. The goal of the information period will be to serve as an opportunity to inform residents of cost effective, efficient and impactful solutions to improve water quality within the Borough of Elizabethtown. Borough staff will advertise these meetings and the appropriate staff and consultants will attend to answer any questions from the public.

Borough Council will make it a priority to appoint members who have an expertise or passion for water quality to its advisory boards and commissions. Borough staff will become active participants in local watershed associations and groups, including participating in meetings, trainings, communications and events within the Borough, region and county.

BMP #2 - Provide Public Opportunities to Comment Prior to Adoption of Borough Ordinance

Prior to the adoption of Zoning, Subdivision and Land Development, Stormwater and Streets and Sidewalks Ordinances, Borough Council will afford the public every opportunity for public comment and feedback in accordance with the Sunshine Act and accompanying provisions.

The Streets Department will be tasked with removing and transporting debris that is dumped in or around streams and stormwater facilities. Streets Department will follow up on complaints concerning improper functioning of the storm drains on all Borough streets.

The Borough will encourage watershed groups, associations and scouting organizations to have a community stream cleanup day twice a year. The Borough will document the efforts of the clean ups. Borough staff will release via social media and website the results of water quality monitoring and inspection results of outfalls.

BMP #3 - Utilize Open Houses to Provide Information to Citizenry
The Public Works Director will host an "Open House" once a year
whereby citizens will have a firsthand knowledge of stormwater
management activities of the Streets Department, operating
procedures of the Waste Water Treatment Plant and an overview of
the Parks and Recreation Department. The event will be held prior
to a duly advertised public meeting of Borough Council. The
Public Works Director will provide an overview of each
department's activities contributing to the overall improvement
of water quality within the Borough. The Public Works Director
will provide input to the citizenry for worthwhile solutions to
limit negative impacts to stormwater facilities on public and
private spaces.

BMP #4 - Information Available to the Public Borough administrative staff will readily make available leaflets, pamphlets, calendars and other literature to individuals paying refuse and sewer bills.

BMP #5 - Public Involvement through a Suggestion Box
In the lobby area, where miscellaneous brochures and
informational documents will be displayed for public use and
reading, Borough staff will place a suggestion box for citizens
to provide feedback on the stormwater program and suggested
improvements. Each month the Borough Manager will collect
deposited suggestion slips by the public, tabulate the
suggestions and share with Department Heads at the monthly
supervisor's meeting. Department heads will provide the Borough
Manager with detailed written reports of the feasibility of each
suggestion no later than fifteen days after the supervisor's
meeting. Suggestions that are found to be feasible will be
implemented by the appropriate department, if at a financial
cost, the appropriate department head will include item within
their department budget proposal for the following fiscal year.

3. Illicit Discharge & Elimination DESKTOP ASSESSMENT OF ILLICIT DISCHARGE POTENTIAL (IDP)

An IDP desktop assessment helps target pollutant sources or areas that may need field monitoring on a more frequent basis. These are referred to as IDP Priority Areas. According to the Center for Watershed Protection's (CWP) publication, there are ten key factors that indicate IDP. The chart, Appendix A, lists them, and those designated with an asterisk are used in the Borough's

desktop assessment because they are either applicable to our community or are practical to analyze.

The map identifies the IDP Priority Areas and the regulated MS4 outfalls within them, based on the desktop analysis, Appendix B. CWP's publication aids in reaching an objective result through the use of quantitative criteria. The following criterion was selected due to its applicability to our municipality.

- a) Past discharge complaints and reports.
- b) MS4 outfall density greater than 20 per stream or channel mile.
- c) Presence of older industrial operations.

Another factor considered in the evaluation process is the concentration of certain land uses referred to as Common Generating Sites. The desktop analysis utilized a list adapted from the CWP manual, reducing the volume of options to a manageable amount. Selection was based on whether the land use was present in the Borough's MS4 area and if the use is categorized as posing a discharge potential. Regulated outfalls in the vicinity of the following uses have been added to the IDP Priority Area list for annual inspection:

- a) Automobile repair
- b) Food processing
- c) Gas stations
- d) Current sites listed on the EPA's ECHO site

The IDP Priority Areas denote the presence of the above land uses and/or areas associated with the criteria listed above. Outfalls that receive flows from the Priority Areas are identified on the map as such and are reflected in the field monitoring schedule, Appendix C. A database of facilities and sites located in the Borough which have an illicit discharge potential will include the site name, owner/operator, address and closest MS4 outfall, Appendix D.

Using the above criteria the IDP Priority Areas will be reevaluated in at the beginning of each reporting period.

FIELD MONITORING FOR DISCHARGES

Other than the IDP Priority Ares identified by the desktop analysis, all stormwater outfalls regulated by the Borough's MS4 NPDES permit must be inspected once per permit cycle. IDP Priority Areas, however, will be inspected no less than once a year for illicit discharge. Screening of the Priority Areas and 20% of the outfalls yearly will be completed as per Appendix C. The outfall numbers correspond to the Borough's MS4 Outfall Map, recently updated in 2014 and subject to further revisions as changes are made to the system.

Field monitoring consists of Borough Staff visiting the selected outfalls and observing current conditions, using generally-accepted practices to look for dry weather flows and/or evidence of illicit discharges. The Outfall Reconnaissance Inventory / Sample Collection Field Sheet, Appendix E, shall be used for documentation of all outfall inspections even if no flow is

present. Photo-documentation of the outfall will supplement the ORI and the field inspector will attempt to trace the discharge back to a probable source, when possible. If an illicit discharge is recognized and a laboratory analytical test confirms the presence of pollutants in the sample, follow-up action is warranted.

Follow-up is initiated by contacting the landowner and/or operator of the facility suspected of producing the illicit discharge, with the intent of eliminating ongoing or future prohibited discharges into the storm sewer system. Subsequent inspections of the affected area will be conducted to ensure that the issue is eliminated. If conditions persist, actions will be taken pursuant to the Elizabethtown Borough Code of Ordinances.

PROCEDURE FOR MONITORING OUTFALLS

Using its maps and field monitoring schedule, Borough staff visually screen outfalls during dry weather. Dry weather is considered to be at least 48 hours without a rain event. Map is attached as "Appendix B." If dry weather flow is present during the outfall inspection, the discharge and surrounding area should be visually screened for color, odor, turbidity, sheen, floating or submerged solids and adverse effects of nearby plants and animals. Should the visual inspection indicate that an illicit discharge may be occurring; the dry weather flow is to be tested for appropriate biological and/or chemical parameters. Biological and chemical testing parameters may vary and are to be appropriate for the suspected pollutant. Common parameters for dry weather flow which may contain pollutants include, but are not limited to: pH, conductivity, chlorine, fluoride, E. coli bacteria, fecal coliform bacteria, metals, suspended solids, dissolved solids, oils, ammonia and detergents. The IDD&E Manual developed by the EPA and Center for Watershed Protection is to be used as quidance.

Additional outfall screening may be necessary based on the results of the first inspection, or if biological/chemical testing indicated pollutants are present.

Laboratory analysis is to be required for some biological and chemical testing parameters. Personnel conducting outfall screenings are to be aware of all QA/QC procedures for the use of field test equipment and for collecting samples for off-site analysis, such as sampling technique, storage of sample and holding times prior to conducting outfall screenings.

If dry weather flow is NOT present the following steps must take place:

Fill out the following sections of the ORI form:

- a) Section 1, includes all physical information on where the outfall is located.
- b) Section 2, includes a physical description of the outfall.
- c) Section 5, includes physical indicators that an illicit discharge may be present.

- Section 6, overall characterization that an illicit discharge may be happening.
- d) Take a photo of the outfall pipe (make sure the date and time stamp is turned on).

If dry weather flow is present the following steps must take place:

- Fill out the following sections of the ORI form:
- e) Section 1, includes all physical information on where the outfall is located.
- f) Section 2, includes a physical description of the outfall.
- g) Section 3, flow characteristics. Testing of flow will include a visual test and a test of pH, ammonia and chlorine.
- h) Section 4, physical indicators of water flow.
- i) Section 5, includes physical indicators that an illicit discharge may be present.
- j) Section 6, overall characterization that an illicit discharge may be happening.
- k) Take a photo of the outfall pipe (make sure the date and time stamp is turned on).
- 1) You must attempt to find the source of the discharge.
- If, while testing the flow characteristics, it is determined the tests results are positive, samples must be taken for a laboratory analysis. The following categories are permitted non-stormwater discharges or flows unless they are identified as a significant contributor of pollutants.
- a) Water line flushing
- b) Landscape irrigation
- c) Diverted stream flows
- d) Rising grounds waters
- e) Uncontaminated ground water infiltration
- f) Uncontaminated pumped ground water
- g) Discharges from potable water sources
- h) Foundation drains
- i) Air conditioning condensation
- j) Irrigation water
- k) Springs
- 1) Water from footings and crawl space pumps
- m) Lawn watering
- n) Individual residential car washing
- o) Flows from riparian habitats and wetlands
- p) Dechlorinated swimming pool discharges
- q) Street wash water

PROCEDURE FOR TRACING THE SOURCE OF A DISCHARGE

Once a discharge has been identified and detected, the next step is to locate the source of that discharge. There are a number of different techniques that can be utilized to trace a discharge.

Visual Inspections of Catch Basins and Manholes

The inspection process utilizing this method needs to start at the discharge point and work "upstream" through the storm drain network. Perform a visual inspection for evidence of flow in each catch basin and/or manhole. Keep moving upstream until no flow or low flow is observed. Keep in mind that as you move upstream, there may be junction lines entering the main storm drainage system at other locations. During this inspection process key observations are necessary, those observations include:

- a) Presence of flow
- b) Odors
- c) Colors/clarity
- d) Stains or deposits on bottom of structures
- e) Oil sheen, scum or foam on any standing water
- f) Grass clippings
- q) Sediment deposit

During this process, sampling can be utilized to assist in this tracing process. Once areas are determined to have a possible illicit source flows, sampling these individual locations can assist in directing where the source of the discharge is located. Typically, you will use the same parameters that were used in the initial sample taken at the discharge point.

Dye Testing

Once the area has been determined where the potential illicit discharge source is located, the utilization of dye testing will assist in determining the exact location of the illicit discharge. The dye needs to be put into the suspect location. The storm drains and sanitary sewers need to be monitored to observe where the dye discharges to. This procedure is effective in determining direct connection of sanitary lines to storm lines.

Televising

Televising can be used to provide detailed information as to where the infiltration or connection is located.

Smoke Testing

Smoke is introduced into the storm sewer system and will emerge at locations that are connected to that system.

4. Construction Site Runoff

The Borough has entered into a Memorandum of Understanding with the Lancaster County Conservation District which developed, implemented and enforces a sediment control program for construction activities that disturb one or more acres of land. Violations found by Borough staff via a site inspection will result in the appropriate sanction and penalties of the applicable section(s) of the Borough Code of Ordinances.

5. Post Construction Runoff Control

The Borough has entered into a Memorandum of Understanding with the Lancaster County Conservation District which developed, implemented and enforces post-construction storm water runoff from new development and redevelopment areas. Violations found by Borough staff via a site inspection will result in the appropriate sanction and penalties of the applicable section(s) of the Borough Code of Ordinances.

Borough staff will utilize post-application and pre-planning meetings with developers to review plans for compliance with Stormwater Management Ordinance.

6. Pollution Prevention/Good Housekeeping

Borough-Owned Property

a) Buildings/Structures

i. 600 South Hanover StreetBuilding

ii. 620 South Hanover Street

iii. 101 East Plum Street

iv. 7 Amosite Road

v. 1360 Acorn Lane

Administration/Police

Administration Annex Public Works Garage Waste Water Treatment Plant Oak Manor Pumping Station

b) Parks

i. 1 Ken Lane

ii. 500 Hickory Lane

iii. 201 South Mount Joy Street

Community Park Hickory Lane Park Softball Field

c) Vacant Lots

i. 820 South Market

ii. 158 North Locust Street

iii. 400 East Willow Street

Public Works Lot Fire Company Lot Open Space

d) Parking Lots

i. 25 South Market Street

ii. 124 West High Street

iii. 4 North Cherry Alley

iv. 40 51 Mechanics Alley

v. 31 East High Street

vi. 26 West High Street

vii. 39 West High Street

Per Department Policy ADMINISTRATION

Administrative support personnel must transfer all inquiries from the general public concerning MCMs, stormwater management or the Borough's MS4 policy program to the Public Works Director or Planning & Zoning Director. The Department will be responsible for educating the public via social media outlets, broadcast and print media press releases, and Borough newsletters.

Should both Department Directors not be available, the Receptionist shall receive the details of a complaint and or inquiry and transmit the communication to the appropriate Department Director via a copy of the Department Log. The original must remain in the originating department. Upon receiving the Department Log, the Director must follow up with the complainant or caller. After completing the follow-up with the complainant or caller - the Director must complete a Department Log detailing the results of the follow-up. The copy forwarded from the Receptionist must be stapled with the department log created by the appropriate department conducting the follow up. If it is a code complaint, the complaint must also be entered into the Permit Manager software program for long term recordkeeping of the property.

ZONING & CODES DEPARTMENT

Code Compliance Officials will enforce the Borough Code of Ordinances against violators. Officials will follow up on all complaints received against a particular party or property owner. If a property owner continues to violate any section or provision of the Elizabethtown Borough Code of Ordinances. Code Officials will pursue penalties prescribed in the applicable section(s) of the Elizabethtown Borough Code of Ordinances. The Planning & Zoning Director and Public Works Director must conduct quarterly inspections of each department to ensure compliance with this policy.

PUBLIC WORKS DEPARTMENT

Public Works staff will perform stormwater inspections and maintenance as they clean catch basins on an as-needed basis. Catch basins are inspected for illicit connections, sediment build up, structural integrity and other related problems. Any problems found will be noted and scheduled for proper repair. All catch basins will be given a complete inspection in the development of the Borough's stormwater management map. A complete inspection will be conducted yearly in conjunction with the priority area map.

Annual Municipal staff training on pollution prevention and techniques. Streets Department will conduct regular street sweeping and frequent catch-basin cleaning. Public Works crews will adhere to and follow pollution protection minimum control measures. Public Works staff will adhere to the following Pollution Protection Minimum Control Measures:

Municipal Vehicles
Vehicle Operations and Maintenance Program
Fueling:

- a) Place overfill prevention equipment on Underground Storage Tanks (USTs). Watch the transfer constantly to prevent overfilling and spilling.
- b) Avoid "topping off" of fuel tanks when refueling vehicles.

- c) Avoid cleaning fuel areas with running water. A damp cloth or damp mop can be used in place of a water hose.
- d) Small fuel spills can be cleaned with rags. However, larger spills require absorbent material such as kitty litter, sand, straw or sawdust. Public Works staff are prohibited from washing petroleum spills into storm drains.

Maintenance:

- 1. Waste and recycling drums will be located on a concrete slab and in a secondary containment. Greasy rags, oil filters, air filters, batteries, spent coolant, degreasers shall not be placed in the dumpster or among regular trash. These items must be placed in a recycling drum that is located within a separate containment on a concrete slab.
- 2. Avoid hosing down work areas.
- 3. Avoid hosing down vehicles on a macadam or concreted areas.
- 4. Department employees will use third party vehicle wash facilities to clean Borough vehicles.
- 5. Collect leaking or dripping fluids in drip pans or containments.
- 6. Keep a drip pan under the vehicle while you unclip hoses, unscrew filters, or remove other parts.
- 7. Do not pour liquid waste into floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.
- 8. Place oil filters in a funnel over the waste oil recycling or disposal, then crush and recycle oil filters; recycle hauler must recycle oil filters.

Washing:

- 1. Wash vehicles at the Waste Water Treatment Plant. The Waste Water Treatment Plant shall be the designated cleaning area for Borough vehicles unless Borough vehicles are washed at a third party car wash facility. Vehicles are not to be washed or sprayed down in the parking lot of Borough facilities.
- 2. The Waste Water Treatment Plant will ensure that wash wastewater can be directed to treatment. Should that option become unavailable, the Waste Water Treatment Plant will develop a grassy or gravel area for vehicles to be washed. The area must be located away from stormwater conveyance systems or any waterways.
- 3. Public Works staff must use phosphate-free biodegradable detergents.
- 4. Public Works supervisors will regularly check for compliance with this policy and provide annual refresher trainings on pollution prevention and good housekeeping.

Elizabethtown Borough Recycling Program:

The Borough's trash and recycling program started on August 7, 1991 as a result of PA Law, Act 101. Act 101 mandated municipalities develop a trash and recycling program. Residents are afforded weekly curbside trash collection that also includes collection of recycling materials such as plastics, newspaper, paper, paperboard, magazines, steel cans, aluminum cans and glass. The Borough outsources this service to a private hauler. Haulers are selected by Borough Council based on the

lowest responsible bid for services performed. Curbside leaf collection, woody waste pickup and white goods and tire collections are other services offered to Borough property owners. Property owners will face penalties prescribed by the Borough Code of Ordinance if they are found to be in violation of the Code as it pertains to collection and storage of leaves, yard waste, rubbish and general waste in drainage easement areas, storm pipes and outlets, drainage basins, rain gardens, infiltration ditches, levees, creeks, creek banks, known and unknown streams, dikes and any other area that will greatly impact stormwater management and water flow and quality.

- 1. Curbside Leaf Collections: Borough residents will be afforded two opportunities to have four curbside leaf collections per year. Dates for leaf collection are listed in the Borough newsletter and placed on the Borough website. Residents must place leaves in a biodegradable Kraft leaf bag which is available for free for Borough Residents. Kraft leaf bags are available to property owners at the Park's Department Building located on Verdant Alley.
- 2. Curbside Woody Waste Pickup: Curbside collection is the second Saturday of each month. Woody waste and branches should be tied with string or twine in bundles less than four feet in length or placed in a can or other container. Borough residents are to keep the containers less than forty pounds in weight and are not to use biodegradable Kraft leaf bags for woody waste.
- 3. White Goods & Tires Collection: Items are collected twice a year by contracted hauler.

White goods include the following:

- a) Clothes washers and dryers
- b) Dishwashers
- c) Freezers
- d) Refrigerators
- e) Stoves
- f) Ovens
- g) Hot water heaters
- h) Air conditioners
- i) Dehumidifiers
- i) Furnaces
- k) Water coolers
- 1) Electrical heaters

Residents will have to secure extra service tags for each item at a cost prescribed by Borough Council, per white good and per tire. Tags can be purchased at the Borough Office.

Attachment - Department Log

DEPARTMENT LOG

DEPARTMENT:	ADMINISTRATION	ZONING & CODES	PUBLIC WORKS	
DATE:	<u> </u>			
DATE OF ACTION	TAKEN:	<u></u>		
MCM ADDRESSED:_				
_				
_				
FOLLOW UP ACTIO	N (TE APPLICABLE)):		
1022011 01 110110		· -		
_				
EMPLOYEE:				
DEPARTMENT SUPE	RVISOR:			

	Past Discharge Complaints and Reports*
	Poor Dry Weather Water Quality
	Density of Generating Sites or Industrial NPDES Stormwater Permits
	Stormwater Outfall Density*
actors	Age of Subwatershed Development
esktop Analysis Screening Factors	Sewer Conversion
creer	Historic Combined Sewer Systems
lysis S	Presence of Older Industrial Operations*
o Ana	Aging or Failing Sewer Infrastructure
sktop	Density of Aging Septic Systems
DP De	Additional Borough Potential Generating Sites
	Automobile Repair*
	Food Processing*
	Gas Stations*
	Current Sites Listed on EPA'S ECHO Site*

