

**ANNUAL MS4 PROGRESS REPORT
PAI130006**

For

**Reporting Period
July 1, 2023, through June 30, 2024**

**London Britain Township
Chester County, PA**

September 30, 2024



RAGAN ENGINEERING Associates Incorporated

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ANNUAL MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) STATUS REPORT

FOR THE PERIOD July 1, 2022 TO JUNE 30, 2023

GENERAL INFORMATION					
Permittee Name:	London Britain Township	NPDES Permit No.:	PAI130062		
Mailing Address:	81 Good Hope Road	Effective Date:	3/15/2013		
City, State, Zip:	Landenberg PA 19350	Expiration Date:	3/15/2018		
MS4 Contact Person:	Glen Frederick	Renewal Due Date:			
Title:	Supervisor	Municipality:	London Britain Township		
Phone:	610-255-0388	County:	Chester		
Email:	carolyn.londonbritaintwp@comcast.net				
Co-Permittees (if applicable):					
Appendix(ces) that permittee is subject to (select all that apply):					
<input type="checkbox"/> Appendix A <input checked="" type="checkbox"/> Appendix B <input type="checkbox"/> Appendix C <input type="checkbox"/> Appendix D <input type="checkbox"/> Appendix E <input checked="" type="checkbox"/> Appendix F					
WATER QUALITY INFORMATION					
Are there any discharges to waters within the Chesapeake Bay Watershed? <input type="checkbox"/> Yes <input type="checkbox"/> No					
Identify all surface waters that receive stormwater discharges from the permittee's MS4 and provide the requested information (see instructions).					
Receiving Water Name	Ch. 93 Class.	Impaired?	Cause(s)	TMDL?	WLA?
WB White Clay Creek	TSF-MF	Yes	Appendix B - Pathogens	Yes	Yes
Walnut Run	CWF-MF	Yes	Appendix B - Pathogens	Yes	Yes
MB White Clay Creek	TSF-MF	Yes	Appendix B - Pathogens	Yes	Yes
EB White Clay Creek	CWF-MF	Yes	Appendix B - Pathogens	Yes	Yes
Christina River	WWF-MF	Yes	Siltation, Nutrients	Yes	Yes
Broad Run	CWF-MF	Yes	Appendix B - Pathogens	Yes	Yes
White Clay Creek	TSF-MF	Yes	Appendix B - Pathogens	Yes	Yes

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

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

Yes No If Yes, Date of Meeting or Event:

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

NLT is a participating partner of CWMP. CWMP offered 5 outreach events with stormwater education displays for the public reaching 103,900 participants. Volunteer outreach activities, litter clean-ups, tree planting, buffer maintenance, and distribution of free trees through Keystone 10 Million Tree Program included another 786 participants and logged 1314 volunteer hours.

3. Report activities in which members of the public assisted or participated in the meetings and in the implementation of the SWMP, including education activities or efforts such as cleanups, monitoring, storm drain stenciling, or others.

Public volunteers assisted in the Brandywine Cleanup and Red Clay Valley Cleanup hosted by Brandywine Red Clay Alliance. Township residents also participated in a township wide trash clean-up effort.

MCM #2 Comments:

London Britain Township has developed and approved a Stormwater Management Ordinance. A TMDL has been drafted and is pending submission to DEP for review.

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

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

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

Yes No

2. Date of latest annual review of IDD&E program: June 2024 Were updates made? Yes No

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

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

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

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

2. Date of last update or revision to map(s): 3/28/2023

3. Total No. of Outfalls in MS4: 72 Total No. of Outfalls Mapped: 72

4. Total No. of Observation Points: Total No. of Observation Points Mapped:

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

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

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

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

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

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

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

3. Date of last update or revision to map(s): 3/28/2023

BMP #4: Conduct dry weather screenings of MS4 outfalls to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. The permittee shall immediately report to DEP illicit discharges that would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property.

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

1. How many unique outfalls (and if applicable observation points) were screened during the reporting period? 0

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

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

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

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

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

Yes No

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

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

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

If Yes, indicate the date of the ordinance or SOP: May 22, 2023

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

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

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

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

Violation Date	Nature of Violation	Responsible Party	Enforcement Taken

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

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

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

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

If Yes, what was distributed? LBT MS4 Permit Compliance Plan

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

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

MCM #3 Comments:

London Britain Township developed an MS4 Compliance Plan in June 2023 to get the Township back on track following a pandemic related slow down in MS4 related activities.

MCM #4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

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

Yes No

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

BMP #1: The permittee may not issue a building or other permit or final approval to those proposing or conducting earth disturbance activities requiring an NPDES permit unless the party proposing the earth disturbance has valid NPDES Permit coverage (i.e., not expired) under 25 Pa. Code Chapter 102.

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

Yes No Not Applicable (no building permit applications received)

BMP #2: A municipality or county which issues building or other permits shall notify DEP or the applicable CCD within 5 days of the receipt of an application for a permit involving an earth disturbance activity consisting of one acre or more, in accordance with 25 Pa. Code § 102.42.

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

Yes No Not Applicable (no building permit applications received)

BMP #3: Enact, implement and enforce an ordinance or SOP to require the implementation and maintenance of E&S control BMPs, including sanctions for non-compliance, as applicable.

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

If Yes, indicate the date of the ordinance or SOP: May 22, 2023

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

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

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

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

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

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

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

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

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

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

Verbal communication during site visits.

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

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

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

MCM #4 Comments:

London Britain Township developed an MS4 Compliance Plan in June 2023 to get the Township back on track following a pandemic related slow down in MS4 related activities. The Township is expecting to resume outfall inspections if additional staffing needs are approved.

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

BMP #1: Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that requires implementation and maintenance of post-construction stormwater management (PCSM) BMPs? Yes No
If Yes, indicate the date of the ordinance or SOP: May 22, 2023
2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j)? Yes No
3. If Yes to #2 and the ordinance or SOP has not been submitted previously, attach a copy of the ordinance or SOP.

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

1. Do you have an ordinance (municipal) or SOP or other mechanism (non-municipal) that encourages and expands the use of LID in new development and redevelopment? Yes No
If Yes, indicate the date of the ordinance or SOP: May 22, 2023
2. If Yes to #1, is the ordinance or SOP consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j)? Yes No
3. If Yes to #2 and the ordinance or SOP has not been submitted previously, attach a copy of the ordinance or SOP.

BMP #3: Ensure adequate O&M of all post-construction stormwater management BMPs that have been installed at development or redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale.

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

London Britain Township developed an MS4 Compliance Plan in June 2023 to get the Township back on track following a pandemic related slow down in MS4 related activities. BMP inspections will return in 2023-2024 pending approval of additional staff.

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

BMP #4: Require the implementation of a combination of structural and/or non-structural BMPs that are appropriate to the local community, that minimize water quality impacts, and that are designed to maintain pre-development runoff conditions.

1. Specify the number of PCSM Plans reviewed during the reporting period for projects disturbing greater than or equal to one acre (including projects less than one acre that are part of a larger common plan of development or sale):
2. Has a tracking system been established and maintained to record qualifying projects and their associated BMPs?
 Yes No

PCSM BMP INVENTORY

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

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

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

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

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

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

MCM #5 Comments:

London Britain Township developed an MS4 Compliance Plan in June 2023 to get the Township back on track following a pandemic related slow down in MS4 related activities.

MCM #6 – POLLUTION PREVENTION / GOOD HOUSEKEEPING

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

1. Have you identified all facilities and activities owned and operated by the permittee that have the potential to generate stormwater runoff into the MS4? Yes No
2. When was the inventory last reviewed? June 2024
3. When was it last updated? June 2023

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

1. Have you developed a written O&M program for the operations identified in BMP #1? Yes No
2. Date of last review or update to written O&M program: June 2024

BMP #3: Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. All relevant employees and contractors shall receive training.

1. Have you developed an employee training program? Yes No
2. Date of last review or update to training program: June 2024 Date of latest training: unknown

3. Training topics covered:
4. Name(s) of training presenter(s):
5. Names of training attendees:

MCM #6 Comments:

London Britain Township developed an MS4 Compliance Plan in June 2023 to get the Township back on track following a pandemic related slow down in MS4 related activities.

POLLUTANT CONTROL MEASURES (PCMs)

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

Task	Date Completed	Attached	Anticipated Completion Date
Storm Sewershed Map(s)	2023	<input checked="" type="checkbox"/>	
Source Inventory		<input type="checkbox"/>	
Investigation of Suspected Sources		<input type="checkbox"/>	
Ordinance/SOP for Controlling Animal Wastes		<input type="checkbox"/>	

PCM Comments:

POLLUTANT REDUCTION PLANS (PRPs) AND TMDL PLANS

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

Type of Plan	Submission Date	DEP Approval Date	Surface Waters Addressed by Plan
<input type="checkbox"/> Chesapeake Bay PRP (Appendix D)			Chesapeake Bay
<input type="checkbox"/> Impaired Waters PRP (Appendix E)			
<input checked="" type="checkbox"/> TMDL Plan (Appendix F)	2024	Pending	Christina River Basin TMDL
<input type="checkbox"/> Combined Chesapeake Bay / Impaired Waters PRP			Chesapeake Bay,
<input type="checkbox"/> Combined PRP / TMDL Plan			

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

Joint Plan Participants:

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

Type of Plan	TSS Load Reduction (lbs/yr)	TP Load Reduction (lbs/yr)	TN Load Reduction (lbs/yr)
<input type="checkbox"/> Chesapeake Bay PRP (Appendix D)			
<input type="checkbox"/> Impaired Waters PRP (Appendix E)			
<input checked="" type="checkbox"/> TMDL Plan (Appendix F)	43,619	12.485	38.9
<input type="checkbox"/> Combined Chesapeake Bay / Impaired Waters PRP			
<input type="checkbox"/> Combined PRP / TMDL Plan			

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

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

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

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

If Yes to #4, describe the plan modifications.

5. Summary of progress achieved during reporting period.

6. Anticipated activities for next reporting period.

PRP/TMDL Plan Comments:

Draft TMDL has been written and will be submitted to PADEP for review following Township approval.

NEW BMPs FOR PRP/TMDL PLAN IMPLEMENTATION

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

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

BMP INVENTORY FOR PRP/TMDL PLAN IMPLEMENTATION

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

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

CERTIFICATION

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

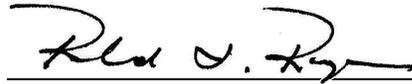
For All Permittees: I certify under penalty of law that this report was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage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

Ronald Ragan

Name of Responsible Official

610.960.8392

Telephone No.



Signature

September 30, 2024

Date

Appendix for MCM #1

Public Education and Outreach Materials

- **Public Education and Outreach Plan (rev. 2024)**
- **2023/2024 CWMP MS-4 Municipal Report for Cost-Share Partners**

**PUBLIC EDUCATION AND OUTREACH PLAN
LONDON BRITAIN TOWNSHIP**

June 2024

GOAL: To achieve measurable improvements in the target audience's understanding of the causes and impacts of stormwater pollution and the steps they can take to prevent it.

PLAN ELEMENTS:

DETERMINING THE NEED FOR EDUCATION AND SOURCES OF MATERIALS

- A. Develop a survey to assess the understanding of stormwater issues by municipal residents and staff. Include elements of the MS4 and the TMDL programs.
- B. Circulate the survey to residents and staff through communication channels such as mailings, email, or website.
- C. Use the results of the survey to source educational materials that will increase the public's knowledge of stormwater issues and the practices that can be applied. Information sources include the Chester County Water Resources Authority, Chester County Conservation District, watershed associations, DEP, and EPA. **Include information on all six MCMs.**

DEVELOPING A TARGET AUDIENCE FOR THE EDUCATION PROGRAM

- A. Create lists to include all individuals and groups to receive education
 - 1. Municipal officials
 - 2. Municipal staff
 - 3. Municipal residents
 - 4. Schools
 - 5. Colleges and Universities
 - 6. Businesses, especially those contributing to the stormwater system
 - 7. Places of Worship
 - 8. Service Clubs
 - 9. Developers and Builders
 - 10. Engineering firms
 - 11. Others
- B. Using the list of individuals and groups, create a spreadsheet of these contacts and track the dates and types of information sent. Update regularly.
- C. Create a mailing list and email list for the target audience and update regularly.

DEVELOPING THE MESSAGE

- A. Develop an annual publication schedule with items to be created or sourced, dates of publication, and means of communication. Use results of the public survey to select educational materials.
- B. Create a tracking system to document each item published and update regularly.
- C. Provide a link to stormwater information. The Chester County Water Resources Authority website (www.chesco.org/water) and have examples of educational materials.
- D. Compare materials with other municipalities and develop materials that can be used by multiple municipalities. Work with public agencies and watershed organizations to develop materials.
- E. Include education information on all 6 of the Minimum Control Measures
- F. Review and update published items annually.

DEVELOP A DISTRIBUTION SCHEDULE FOR EDUCATION MATERIALS

- A. Create a list of distribution methods to include displays, posters, signs, pamphlets, booklets, brochures, radio, local cable TV, newspaper articles, presentations, and giveaways.
- B. Use at least two of these methods annually in addition to newsletters and website.
- C. Maintain records of all distributed materials including item distributed, date distributed, recipient, number distributed, and method of distribution. Provide this information to DEP in annual reports.
- D. Leverage distribution by partnering with watershed and environmental education organizations on education information.
- E. Utilize schools as a means of distribution of materials.

MEASURE PUBLIC UNDERSTANDING OF STORMWATER CAUSES AND IMPACT

- A. Circulate survey to target audience annually
- B. Compare results of survey to previous year
- C. Focus future education efforts on stormwater management issues where public knowledge is not improving.



2023/2024 CWMP MS4 Municipal Report for Cost-Share Partners

Prepared by Brian Winslow, Watershed Conservation Director, Brandywine Red Clay Alliance

CWMP is supported through the generous cost-sharing support from the following municipalities in 2023/2024:

- Avondale Borough
- Birmingham Township
- City of Coatesville
- Downingtown Borough
- East Bradford Township
- East Brandywine Township
- East Caln Township
- East Fallowfield Township
- East Marlborough Township
- East Whiteland Township
- Franklin Township
- Honey Brook Borough
- Honey Brook Township
- Kennett Square Borough
- Kennett Township
- London Britain Township
- London Grove Township
- Londonderry Township
- Modena Borough
- New Garden Township
- New London Township
- Parkesburg Borough
- Penn Township
- Pocopson Township
- Sadsbury Township
- South Coatesville Borough
- Thornbury Township
- Upper Uwchlan Township
- Uwchlan Township
- Valley Township
- Wallace Township
- West Bradford Township
- West Brandywine Township
- West Chester Borough
- West Goshen Township
- West Grove Borough
- West Pikeland Township
- West Whiteland Township
- Westtown Township

This report summarizes activities by CWMP and its Planning Team organizations to help municipalities meet their MS4 requirements, especially MCM's 1, 2 and 6. As a cost share participant, these municipalities help to financially support these activities, and many are active participants in the meetings, events and activities listed in this report.



The municipalities listed on page 1 of this report supported CWMP activities in 2023/2024 through a cost-share contribution. CWMP provides many resources for residents, elected officials, municipal staff and consultants outlined in this report. The following is a summary of CWMP, its Planning Team Organization and scope of work.

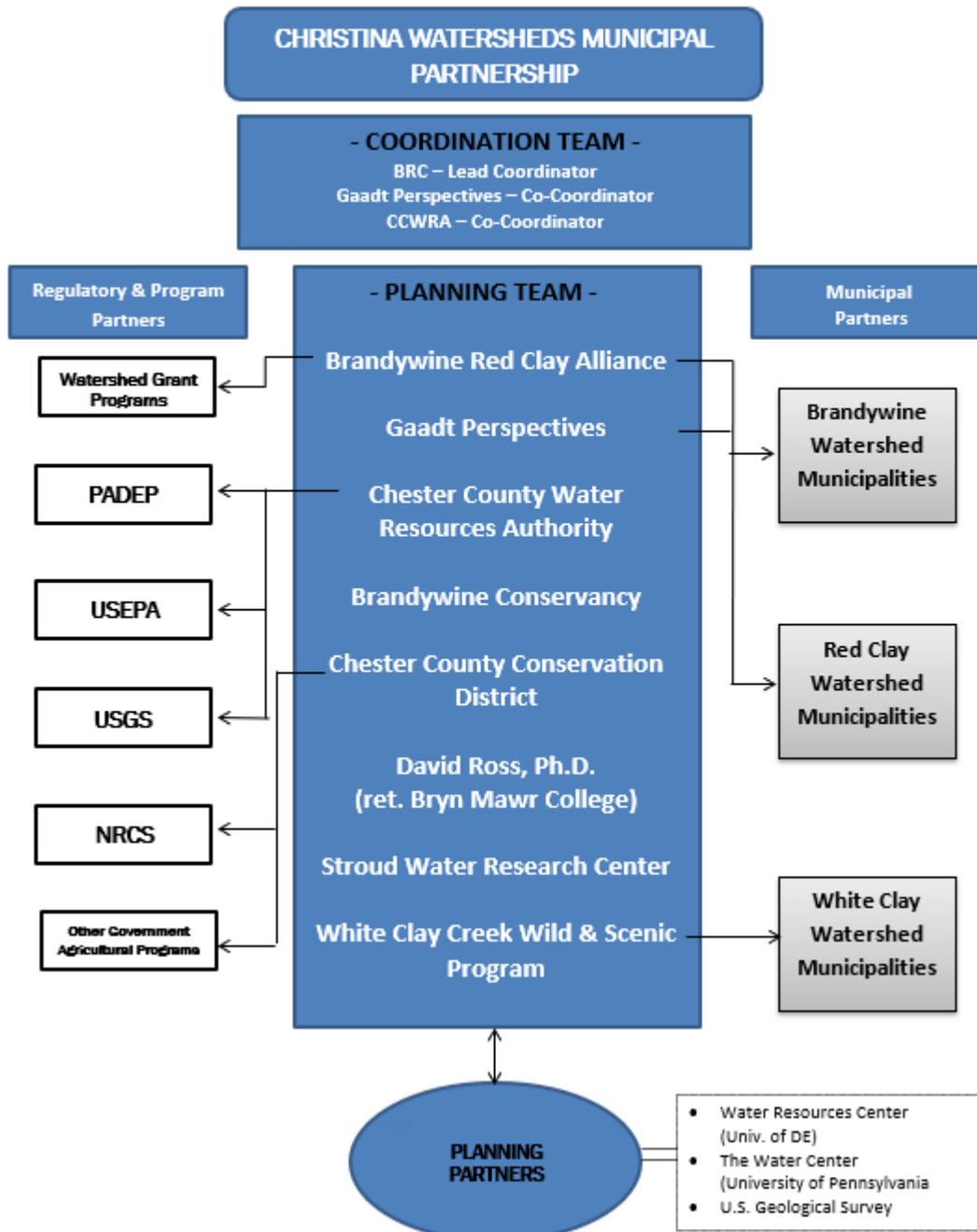
CWMP Organizations offered a Grand total of 153 stormwater related programs/events, serving 103,900 participants, including 3,193 participants attended events and activities and 561 volunteers recording 1,314 volunteer hours for MCM 1, 2 and 6 between July 1, 2023 and June 30, 2024. Details for each of these activities is described under each MCM area below.

The Christina Watersheds Municipal Partnership (CWMP) is a long-term partnership of Pennsylvania municipalities, county agencies, and watershed conservation organizations. The mission of CWMP is *to facilitate and support engagement and collaboration of Pennsylvania municipalities, landowners, and other stakeholders to restore and protect the water quality of streams in the Brandywine Creek, Red Clay Creek and White Clay Creek watersheds.*

CWMP has been helping municipalities in the Chester County Pennsylvania portion of the Christina Watershed meet their MS4 requirements since the inception of Pennsylvania's MS4 program. Municipal members of CWMP participate in CWMP meetings, workshops and receive communications, technical assistance and materials from CWMP to help them meet their MS4 requirements. CWMP also provides a number of print, electronic and other resources each year to cost-share municipalities to assist with stormwater public education, outreach, staff training and technical assistance. These resources include an annual stormwater education advertisement (print and digital) and a broad array of resources and event calendar available on our website at www.cwmp.org.

The www.CWMP.org website launched in January 2021 is an example of the benefits derived from the collaboration of CWMP's planning team. Municipal members pay an annual cost share to participate in CWMP activities. This fee helps to support the time and expenses devoted to this effort by planning team members. Funding received from annual municipal member fees covers only a fraction of CWMP's total annual operating costs, with grants and in-kind donations covering the remaining expenses. Each dollar contributed by municipalities through their annual cost share is leveraged by an equal or greater value of grant dollars and in-kind contributions from planning team members.

The CWMP Planning Team meets at least 10 times a year to coordinate CWMP activities and identify opportunities to assist municipalities to improve water quality from a watershed perspective. Our Planning Team members bring the support and expertise of their organizations to this effort. Planning team members include: Brandywine Red Clay Alliance, Brandywine Conservancy, Chester County Conservation District, Chester County Water Resources Authority, David Ross Ph.D. (ret. Bryn Mawr College), Gaadt Perspectives, Stroud Water Research Center, White Clay Wild and Scenic Program, The Water Center at University of Pennsylvania and University of Delaware Water Resources Center.



7/1/2022

MCM #1- Public Education and Outreach on Stormwater Impacts

CWMP SUMMARY of MCM #1 Activities 2023/2024 Presented by CWMP Planning Team Organizations				
PLANNED ACTIVITIES			ACCOMPLISHMENTS	
Activity	Target Audience	Planned Timeframe	Date Completed	# People Reached
1 <u>Maintain www.cwmp.org website with stormwater resources, calendar of events and technical assistance</u>	Home owners, farmers, developers, municipal staff and elected officials	July 1, 2023- June 30, 2024	June 30, 2024- website is updated regularly and maintained with current resources	From Google Analytics: <ul style="list-style-type: none"> • 2,357 sessions • 11,177 Pageviews
2 <u>World Water Day and Earth Day Ads:</u>	Chester County Residents	Spring 2024	<i>Published total of 9 dates in Daily Local March 22, 24 & April 21, 22 and 28, in Southern Chester County News March 28 & April 11, 18 and 25.</i>	Circulation for ads in Chester Couty: <ul style="list-style-type: none"> • 80,000 monthly readership of print edition • 332,000 monthly unique visitors on-line edition • 466,000 total monthly audience reached Actual Daily Local News digital Ad analytics: 29,195 views and 41 clicks to www.cwmp.org/about/

**CWMP SUMMARY of MCM #1 Activities 2023/2024
Presented by CWMP Planning Team Organizations**

PLANNED ACTIVITIES			ACCOMPLISHMENTS		
Activity	Target Audience	Planned Timeframe	Date Completed	# People Reached	
3 <u>Water Education Programs presented to youth through school and scout programs and Summer Camps</u>	Youth ages 4-18 in Chester County	July 1, 2023- June 30, 2024	Includes programs presented during this time	Summary of all programs: 25 School and scout programs presented to 1,130 children at Brandywine Red Clay Alliance 55 week long summer camp sessions presented to 585 youth (note summer of 2023 attendance) at Brandywine Red Clay Alliance	
4 <u>Adult/family oriented stormwater education events and programs</u>	Adults and family Chester County	July 1, 2023- June 30, 2024	Includes all programs presented during this time	Summary of all programs: 25 programs presented to family and adults, 814 participants by CWMP Planning Team organizations	

MCM 1 Details of activity provided by CWMP 2023/2024

- **CWMP website, www.cwmp.org, provides a large variety of on-line stormwater resources for homeowners, farmers, developers and municipal staff and elected officials.** Many CWMP cost-share municipalities listed on page 1 of this report, post links to these shared resources provided via the website to educate residents about stormwater related issues. This website includes:
 - Calendar of stormwater education, outreach and engagement activities
 - Stormwater resources for homeowners, developers, farmers
 - Municipal Partner resources for municipal staff and elected officials
 - Stormwater training resources for municipal staff
 - MS4 information and resources for residents, staff and elected officials
 - List of stormwater grant sources
 - Links to related stormwater resources and trainings
 - MS4 Technical Assistance/Load & Reduction Calculations
 - Stormwater articles to be re-published by municipalities (be sure to re-publish articles in your municipality)
 - Communication and Outreach Toolbox with sample social media posts on stormwater topics for municipalities to cut and paste into their social media and more.

We encourage municipalities to post the CWMP calendar via a Google Calendar link on their website and provide links to www.cwmp.org in their newsletters, websites and social media to help meet their stormwater education requirements. For information and guides on how to make these links, contact bwinslow@brandywineredclay.org.

Website Visitation Data July 1, 2023- June 30, 2024

User data From Google Analytics:

- 2,357 sessions, up from 1,642 sessions in FY 2023
- 11,177 Pageviews 2,794 in FY 2023
- The top visited page demonstrate that user were looking for specific stormwater resources:
 - CWMP.org home page
 - Stormwater and pollution management
 - CWMP calendar of events
 - Homeowner resources
 - Stormwater regulations
 - Building project resources
 - Partner (CWMP) resources
 - Farmer Resources
 - CWMP contacts
- **CWMP purchased a series of print and digital advertisements promoting stormwater education and driving readers to the CWMP.org website to see further educational materials. The following ads were run:**
Spring 2024 CWMP Stormwater Advertisement- Ad was titled “You Can Help Reduce Flooding and Improve Water Quality”, ads ran around World Water Day (March 20) And Earth Day, April 22 (see copy of ads in appendix)
Published total of 9 dates in Daily Local March 22, 24 & April 21, 22 and 28, in Southern Chester County News March 28 & April 11, 18 and 25.

Circulation for ads in Chester County:

- 80,000 monthly readership of print edition
- 332,000 monthly unique visitors on-line edition

- 466,000 total monthly audience reached

Actual Daily Local News digital Ad analytics:

29,195 views and 41 clicks to www.cwmp.org/about/

CWMP Planning Team organizations offer a variety of water quality and stormwater education programs each year.

CWMP has asked all of these organizations to report their attendance at these activities for use in MS4 reports where appropriate. The following is a summary of the 2023/2024 stormwater and water quality activities hosted by CWMP partner organizations and their collaborators.

Highlights of the report for MCM 1 include:

- **CWMP Organizations offered 105 MCM 1 Public Education activities, serving 2,529 participants at program events. These included:**
 - 55 week long summer camp sessions with water education included offered by Brandywine Red Clay Alliance in Summer of 2023 with 585 children participating
 - 25 School and youth watershed related programs offered by Brandywine Red Clay Alliance to 1,130 children and youth.
 - 25 adult and family water education programs by all CWMP Planning Team members serving 814 participants

To see where events and activities were located and their target audiences by municipality, an excel spreadsheet of all the submitted data is available upon request.

MCM #2- Public Involvement Participation

CWMP SUMMARY OF MCM #2 ACTIVITIES 2023/2024 Presented by CWMP Planning Team Organizations Public Participation And Involvement Accomplishments					
PLANNED ACTIVITIES				ACCOMPLISHMENTS	
	Activity	Target Audience	Planned Timeframe	Date Completed	# People Reached/ results
1	<u>Outreach Events with stormwater education displays for the public</u>	Families and adults in Chester County	July 1, 2023- June 30, 2024	Includes outreach events throughout the year	Summary of all events: 5 events with 103,900 participants. This included Kennett Mushroom Festival tabling event with stormwater materials reaching over 100,000 visitors
2	<u>Volunteer outreach activities including; litter clean-ups, tree planting and buffer maintenance activities</u>	Chester County Residents; homeowners, businesses, organizations	July 1, 2023- June 30, 2024	Includes all volunteer activities during this time	5 volunteer/outreach activities 561 participants 1,314 volunteer hours
3	<u>Distribution of free tree through Keystone 10 Million Tree Program by Chester County Conservation District and Brandywine Red Clay Alliance</u>	Chester County Residents; homeowners, businesses, organizations, municipalities, parks	Fall 2023 & Spring 2024	October, 2023 April 2024	5,500 trees in fall 2,600 trees in spring <u>8,100</u> total trees distributed to over 225 landowners and organizations

MCM 2 – CWMP Details of Activities

- **CWMP Planning Team Organizations offered the following activities:**
 - 5 Outreach events reaching 103,900 participants
 - 5 Activities including clean-ups and tree plantings with 561 volunteers contributing 1,314 volunteer hours
 - These events included Clean-up Events: Brandywine Cleanup and Red Clay Valley Cleanup, hosted by Brandywine Red Clay Alliance,



Brandywine Clean up event in Coatesville, PA



Red Clay Clean up in Kennett Township

- Tree Planting events
 - BRC held a tree planting event in East Marlborough Township with 32 volunteers contributing 128 hours in Pocopson and East Marlborough Township.
 - Chester County Conservation District distributed 8,100 trees to over 225 residential landowners in fall 2023 and spring 2024 through Keystone 10 Million Tree Project



Over 100 people came for the "Tree For All" event to pick up trees for their homes in fall 2023

MCM # 6 – Pollution Prevention/ Good Housekeeping

CWMP SUMMARY OF MCM #6 ACTIVITIES 2023/2024 Professional Training for Municipal Staff and Official Accomplishments					
PLANNED ACTIVITIES				ACCOMPLISHMENTS	
	Activity	Target Audience	Planned Timeframe	Date Completed	# People Reached/ results
1	<u>Lawn to Meadow Workshop</u>	HOA's and Municipal Public Works staff in Chester County	Fall 2023	10/3/2023	3- hour workshop 50 participants
2	<u>Green Stormwater Infrastructure workshop for Public Works Staff</u>	Municipal Public Works staff, engineers	Spring 2024	6/4/2024	6-hour workshop 22 participants
3	<u>CWMP Meetings; Elected officials breakfast meeting and CWMP meeting (2) on stormwater funding, green stormwater infrastructure and MS4 inspections</u>	Municipal staff, engineers and supervisors	Throughout the year	2/28/2024 11/6/2023 8/3/2023	3 meetings 77 participants
4	<u>NPDES updates with the PILOT program, and some reminders about the expiring PAG 02 General Permit in December</u>	Municipal Staff and engineers, provided by Chester Co. Cons. District	Spring 2024	5/24/2024	1 Meeting presentation 25 participants

5	<u>CWMP e-Newsletters and emails sent to CWMP municipal partners: to keep them informed of upcoming events, grant funding, updates to CWMP website and DEP updates to share</u>	Municipal staff, engineers and supervisors	July 1, 2023- June 30, 2024	4 Newsletters and 6 email updates sent during this time	Each mailing sent to 125 contacts on CWMP mailing list, total 1,250 unique contacts sharing CWMP stormwater information.
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MCM #6 Staff training is included in MCM 6 requirements and CWMP offers a variety of opportunities for municipal staff training at meetings, workshops, newsletters and on-line resources and links:

Three webinars/ workshops were held for municipal staff training including public works staff, managers and municipal engineers. Workshops are meant to be more in-depth training, one workshop included a certificate of completion from Chesapeake Bay Landscape Professionals. These workshops include professional presenters that included staff from Chesapeake Bay Landscape Professionals, Stroud Water Research Center, Chester County Conservation District and Chester County Water Resources Authority. While there is a fee to participants for some events, over 50% of the costs were covered by CWMP cost-share funding provided by municipalities each year.

Quarterly CWMP meetings are intended for municipal staff, engineers and elected officials responsible and/or interested in stormwater and meeting MS4 requirements. These meeting can be used to satisfy the requirements of MCM # 6. Regular email newsletters and email updates keep CWMP participants up to date on upcoming events, grant deadlines, resources and website updates. The topics listed above were covered at CWMP meetings during this time period.

CWMP sent out 4 e-newsletters and 6 email updates to all CWMP municipal participants that includes municipal managers, public work managers and engineers with 125 individuals on the email list, totalling 1,250 unique contacts to share stormwater information, training, grants and resources with municipalities throughout the year.

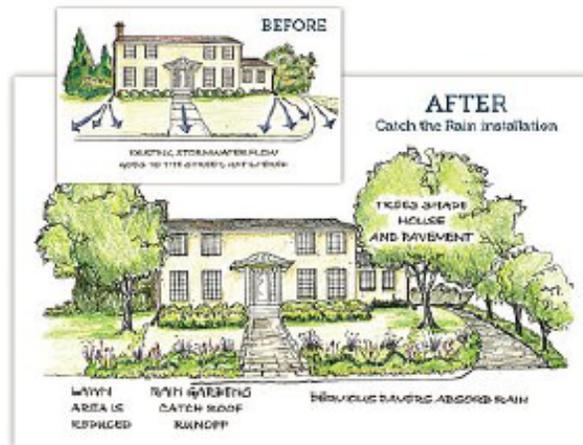
Other sources of staff training are also available and all are listed on the CWMP website at <https://cwmp.org/stormwater-training/> on the CWMP calendar at <https://cwmp.org/cwmp-calendar/>

APPENDIX

ATTENDANCE DATA SAMPLE DOCUMENTS, PHOTOS, ETC

2023/2024 MS4 Report SUMMARY		# programs/ events	Outreach Events/ participants	# participants	# volunteers	volunteer hours
TOTALS BY CATEGOTY						
MCM 1 Public Education	Total adult water education programs	25		814		
MCM 1 Public Education	School/youth based water ed. Programs	25		1,130		
MCM 1 Public Education	week long summer camp with water education	55		585		
TOTAL MCM 1		105	-	2,529	-	-
MCM 2 Public Participation	Outreach Events	5	103,900			
MCM 2 Public Participation	Volunteer activity	5			561	1,314
MCM 2 Public Participation	Public engagement meetings and volunteer	32	-	519		
TOTAL MCM 2		42	103,900	519	561	1,314
MCM 6 Good Housekeeping and Muncipal Staff Training	Total water training for muni staff	6	-	145	-	-
TOTALS BY MCM						
MCM 1 Public Education	MCM1 Total Activities	105		2,529	-	-
MCM 2 Public Participation	MCM 2 Total Activities	42	103,900	519	561	1,314
MCM 6 Good Housekeeping and Muncipal Staff Training	MCM 6 Total Activities	6	-	145	-	-
Grand TOTALS		153	103,900	3,193	561	1,314

Celebrate Water Day, March 22, 2024
You Can Help Reduce Flooding and Improve Water Quality



Graphic created by Beth Burnam, provided by Brandywine Conservancy

Learn how at www.cwmp.org:

- **Plant a tree or shrub** to help absorb stormwater and provide shade
- **Reduce lawn areas** and replace with native plants
- **Catch rainwater from downspouts** by installing a rain barrel or rain garden
- **Reduce impervious surfaces** or replace with pervious pavers
- **Volunteer** at litter clean-up or tree planting event
- **Learn more** at a workshop or virtual program at <https://cwmp.org/cwmp-calendar/>

Sponsored and Paid for by:

Did you know that in Pennsylvania, every municipality with an urbanized area and impaired stream must develop and implement a municipal stormwater management plan? Learn more by visiting your municipality's web site.

The following municipalities participated in the 2023/24 CWMP Cost Share

- | | | |
|-----------------------------|-----------------------------|----------------------------|
| • Avondale Borough | • Kennett Square Borough | • Upper Uwchlan Township |
| • Birmingham Township | • Kennett Township | • Uwchlan Township |
| • City of Coatesville | • London Britain Township | • Valley Township |
| • Downingtown Borough | • London Grove Township | • Wallace Township |
| • East Bradford Township | • Londonderry Township | • West Bradford Township |
| • East Brandywine Township | • Modena Borough | • West Brandywine Township |
| • East Caln Township | • New Garden Township | • West Chester Borough |
| • East Fallowfield Township | • New London Township | • West Goshen Township |
| • East Marlborough Township | • Parkesburg Borough | • West Grove Borough |
| • East Whiteland Township | • Penn Township | • West Pikeland Township |
| • Franklin Township | • Pocopson Township | • West Whiteland Township |
| • Honey Brook Borough | • Sadsbury Township | • Westtown Township |
| • Honey Brook Township | • South Coatesville Borough | |
| | • Thornbury Township | |



www.cwmp.org

CWMP is a partnership of municipalities, county agencies, and watershed conservation organizations to restore and protect the water quality of streams in the Brandywine Creek, Red Clay Creek and White Clay Creek watersheds. For a list of all partners visit: www.cwmp.org/about/

Earth Day Advertisement April 2024, published in Daily Local April 21, 22 and 28, in Southern Chester County News April 11, 18 and 25.

March 2023 Digital ad for World Water Day, April 2023 Digital ad for Earth Day Font & Center Power Banner published on Dailylocal.com with 29,195 views and 41 clicks to www.cwmp.org/about/

Celebrate Earth Day, April 22, 2024
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Graphic created by Beth Burnam, provided by Brandywine Conservancy

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The following municipalities participated in the 2023/24 CWMP Cost Share

• Avondale Borough	• Kennett Square Borough	• Upper Uwchlan Township
• Birmingham Township	• Kennett Township	• Uwchlan Township
• City of Coatesville	• London Britain Township	• Valley Township
• Downingtown Borough	• London Grove Township	• Wallace Township
• East Bradford Township	• Londonderry Township	• West Bradford Township
• East Brandywine Township	• Modena Borough	• West Brandywine Township
• East Caln Township	• New Garden Township	• West Chester Borough
• East Fallowfield Township	• New London Township	• West Goshen Township
• East Marlborough Township	• Parkesburg Borough	• West Grove Borough
• East Whiteland Township	• Penn Township	• West Pikeland Township
• Franklin Township	• Pocopson Township	• West Whiteland Township
• Honey Brook Borough	• Sadsbury Township	• Westtown Township
• Honey Brook Township	• South Coatesville Borough	
	• Thornbury Township	

www.cwmp.org

CWMP is a partnership of municipalities, county agencies, and watershed conservation organizations to restore and protect the water quality of streams in the Brandywine Creek, Red Clay Creek and White Clay Creek watersheds. For a list of all partners visit: www.cwmp.org/about/



LAWN TO MEADOWS WORKSHOP



Tuesday, October 3, 2023

9:00 AM to noon, lunch provided

At Shadyside Park, West Bradford Township, PA.

Register at: <https://bvarcva.formstack.com/forms/lawntomeadow>

Cost: Free to CWMP Cost Share Partner Municipalities and HOA's, residents, and landscapers located in these municipalities (see list attached)
Other residents and entities are welcome, fee is \$20

Topics include:

- Introduction to meadows and stormwater benefits
- Funding for meadows
- Working with communities and weed ordinances
- Planning and care of meadows
- Long term maintenance and tour of meadow

Presenters:

- Christina Watersheds Municipal Partnership (CWMP), Brian Winslow
- PA Dept. of Conservation and Natural Resources, Alyssa Keiser and Nikki Lee
- Pennsylvania Environmental Council, Paul Racette and Susan Myerov
- Weeds, Inc, owner Drew O'Neil (meadow installation and maintenance)
- West Bradford Township



Sustainable Stormwater BMP Management

A one-day Workshop for Public Works Staff



Tuesday, June 4, 2024

9:00 am - 3:00 pm

Borough of West Grove
Chester County, PA

Lunch Included

CWMP Members use the coupon code **CWMP** to reduce the cost to \$50 per person.

Register today, space is limited!

Limit of two staff per municipality. If you'd like to send additional staff, send an email to bwinslow@brandywineredclay.org to be added to a waiting list.

Designed for maintenance crew and crew leaders who have not completed CBLP level 1 Training

Focus on engagement, interaction and hands on learning

Topics include managing invasive plants, BMP maintenance tasks, best plants for BMPs

Participants will receive the CBLP-CREWS certificate

<https://certified.cblpro.org/product/private-cblp-crews/>



Appendix for MCM #2
Public Involvement & Participation

- **Public Involvement and Participation Plan (rev. 2024)**

- **BOS Meeting Minutes – Discussions about Stormwater Issues and MS-4**

PUBLIC INVOLVEMENT AND PARTICIPATION PLAN

LONDON BRITAIN TOWNSHIP

June 2024

GOAL: To develop, implement, and maintain a written Public Involvement and Participation Plan that encourages the public's participation in stormwater planning and management.

PLAN ELEMENTS:

DEVELOPING OPPORTUNITIES FOR PUBLIC PARTICIPATION

- A. Identify and list opportunities for the public to participate in the MS4 program.
- B. Identify and list communication methods to the target audiences. The audience should include municipal residents, municipal officials and staff, businesses, churches, watershed organizations, and related agencies. Phone, email, mail, and websites are good means of communicating with these groups. Occasional meetings should also be arranged. Maintain records of contacts with these groups.
- C. Maintain a record of public participation activities noting number of participants, date and location of activity, and quantify the results of the activity.
- D. Determine impact of activity on MS4 program to evaluate results.
- E. Maintain a list of notices and invitations for participation distributed each year to document efforts to engage public. Report the results to DEP in the annual report.

DEVELOPING PUBLIC NOTICE AND INPUT ON STORMWATER ORDINANCES

- A. Develop a protocol for advertising and reviewing proposed stormwater ordinances.
- B. Create a form to list proposed stormwater ordinances, date of ordinance advertisement, date reviewed by the municipality, public comments and municipal responses, and date adopted.
- C. In addition to newspaper advertisement, notify public through the website and other electronic means available to the municipality.
- D. Review and update protocol annually.

COMMUNICATING STORMWATER ORDINANCE ACTIONS TO THE PUBLIC

- A. Hold at least one public meeting annually to solicit public involvement and participation in the stormwater management program.
- B. Notify target audience directly and through municipal website and postings in public locations.
- C. Use the public meeting to present a summary of progress, activities, and accomplishments through implementation of the Stormwater Management Plan (SWMP)
- D. Solicit feedback from the public on the SWMP.
- E. At meeting document and report cooperation and participation with other organizations and participation of public in supporting the implementation of the SWMP. Activities could include cleanups, storm drain stenciling, water quality monitoring, and educational activities.
- F. Summarize the meeting in writing and post on the municipal website.

London Britain Township
Board of Supervisors Meeting
May 22, 2023 approved 6/5/23 BOS mtg

Ordinance #23-1 Hearing

Aileen Parrish, Chairman of the Board of Supervisors opened the Hearing at 7:05pm. In attendance were Supervisor Brian Sachs, Secretary Carolyn Matalon, Treasurer Nette Stejskal, Planning Commission members Les and Stephanie Town, Township Engineer Ron Ragan and residents

Ordinance #23-1 Stormwater Management Ordinance

Township Engineer Ron Ragan provided an overview of the changes to the Stormwater Management Ordinance from the previous Ordinance.

Ordinance #23-1 is an Ordinance to enact comprehensive regulations and requirements for stormwater management for new and existing development and improvements located in London Britain Township. The Ordinance replaces the existing Township Stormwater Management Ordinance and is consistent with the Chester County Act 167 Model Ordinance.

The Ordinance was reviewed by the Township Engineer Ron Ragan, Township Attorney Tom Oeste and a review has been received from the Township Planning Commission.

Aileen Parrish made a motion to close the hearing at 7:42pm.

Board of Supervisors Meeting

Aileen Parrish, Chairman of the Board of Supervisors opened the Board of Supervisors meeting at 7:42pm. In attendance were Supervisor Brian Sachs, Secretary Carolyn Matalon, Treasurer Nette Stejskal, Planning Commission members Les and Stephanie Town, Township Engineer Ron Ragan and residents

Ordinance #23-1 Stormwater Management Ordinance

Brian Sachs made a motion to adopt Ordinance #23-1 as written. Aileen Parrish seconded and the motion carried unanimously.

5/22/23 revised Agenda

Aileen Parrish made a motion to add Resolution #23-10 to the agenda to add a signature page to Ordinance #23-1. Brian Sachs seconded and the motion carried unanimously.

Resolution #23-11

Aileen Parrish made a motion to adopt Resolution #23-11 as a signature page for the adoption of Ordinance #23-11. Brian Sachs seconded and the motion carried unanimously.

Old Business

Town hall update- Brian Sachs provided an update for the Township hall project exterior lighting, temporary hall steps, removal of file cabinets/files, chairs, tables, hall layout, historic archival items, architect design firms for phase 2b/investigation of the building, AED device.

Amish Buggy 896 sign flashers- Aileen Parrish stated that McMahon Assoc researched possible placement of flashers on/at the 896 Amish Buggy signs on 896. They stated that the flashers would have to have concrete base support for the signs. The cost is \$25,000-\$30,000. The flashers for the signs are cost prohibitive.

Artesian Well update- Aileen Parrish spoke with the Director of Chester County Water Resources. London Britain Township will be advised of any new information.

New Business

AED device for Township Hall- The Board discussed the purchase of an AED (defibrillator) for the Township Hall. The purchase of the AED device will be added to the 6/5/23 meeting agenda as some more information is needed.

Mold remediation Township office

The Township contacted ServPro to provide a quote for mold remediation of the Township building basement as well as cleaning all the ductwork in the building. ServPro provided a quote for all the work at a total cost of \$6742. The Board of Supervisors discussed whether to include painting of a microbial paint on the ceiling of the basement. The Board agreed to include the painting of microbial paint. After the basement has the mold remediated, the space will be used to store files that are currently housed in the Township Hall.

Brian Sachs made a motion to approve the cost of the mold remediation from ServPro in the amount of \$6742. Aileen Parrish seconded and the motion carried unanimously.

A new dehumidifier will need to be purchased for use in the basement.

Special Event permit #SE23-1 Aileen Parrish made a motion to waive the fee for the non-profit Special Event permit which was held at the Great Big Jerk restaurant on Rt 896. Brian Sachs seconded and the motion carried unanimously.

Planning Commission- Stephanie Town discussed some proposed Ordinance discussions the Planning Commission has such as a revised sign ordinance, EV parking Ordinance and a Park rules Ordinance.

Minutes

5/8/23 Board of Supervisors meeting- Aileen Parrish made a motion to adopt the minutes of 5/8/23 as written. Brian Sachs seconded and the motion carried unanimously.

Treasurers Report Nette Stejskal presented the Treasurer's Report for 5/22/23 (report attached) and reviewed the following invoices over \$1,000:

D Gargula	\$2082.50	MSI	\$1681.34
Ragan Eng	\$4895.00	Rickerman tree	\$2400.00
Wex Bank	\$1234.08	Full Throttle	\$2041.00
Walton Water	\$2991.21	D Gargula	\$1539.00
Eagle Power	\$31770.00	Wilhelms Serv	\$1605.36

General Fund –Aileen Parrish made a motion to approve the ACH transactions for the payment of payroll taxes, interest on the DVRFA loans, the F350 small capital loan, insurance, bank fees and P Card purchases. Brian Sachs seconded and the motion carried unanimously.

General Fund – Aileen Parrish made a motion to approve check numbers 16501-16518 noting that ck#16515 is void from the M&T Bank Account. Brian Sachs seconded and the motion carried unanimously.

General Fund – Aileen Parrish made a motion to approve check numbers 9383-9402 from the PLGIT Bank Account. Brian Sachs seconded and the motion carried unanimously.

General Fund – Aileen Parrish made a motion to approve the transfer to the Park Fund, Open Space Fund and Capital Fund. Brian Sachs seconded and the motion carried unanimously.

Park Fund- Aileen Parrish made a motion to approve check numbers 3008-3012 from the Park Fund. Brian Sachs seconded and the motion carried unanimously.

Park Fund – Aileen Parrish made a motion to approve the transfer to the General Fund. Brian Sachs seconded and the motion carried unanimously.

Open Space Fund – Aileen Parrish made a motion to approve the transfer to the General Fund. Brian Sachs seconded and the motion carried unanimously.

Windsor Sewage Fund – Aileen Parrish made a motion to approve check numbers 1424-1427 from the Windsor Sewage Fund. Brian Sachs seconded and the motion carried unanimously.

Capital Fund –Aileen Parrish made a motion to approve the transfer to the General Fund. Brian Sachs seconded and the motion carried unanimously.

Capital Fund- Aileen Parrish made a motion to approve check #1435 from the Capital Fund. Brian Sachs seconded and the motion carried unanimously.

Highway Fund -Aileen Parrish made a motion to approve check numbers 7069-7079 from the Highway Fund. Brian Sachs seconded and the motion carried unanimously.

Highway Fund- Aileen Parrish made a motion to approve the transfer to the General Fund for the F350. Brian Sachs seconded and the motion carried unanimously.

Windsor LOC Account- Aileen Parrish made a motion to approve the transfer to the Sewage Fund. Brian Sachs seconded and the motion carried unanimously.

Business from the Floor

Adjournment Brian Sachs made a motion to adjourn the meeting at 9:40pm. Aileen Parrish seconded and the motion carried unanimously.

Appendix for MCM #3

Illicit Discharge Detection and Elimination Controls

- **London Britain Township IDD&E SOP (rev. 2024)**
- **London Britain Township MS-4 Work Map**
- **Regulated Outfall Inventory and Inspection Tracking Spreadsheet**

**Standard Operating Procedure (SOP) for Clean Water Program
MCM #3 Illicit Discharge Detection and Elimination (IDD&E)
London Britain Township, Chester County
June 2024**

This SOP describes the procedures by which London Briatin Township personnel shall handle illicit discharge complaints and incidents and perform dry weather outfall investigations, screenings and testing in the field and determine appropriate courses of action.

This SOP is intended to comply with DEP's Policy for Implementing the Department of Environmental Protection (Department) Permit Review Process

Authorized discharges

- Discharges from firefighting activities;
- Potable water sources including water line and fire hydrant flushing;
- Irrigation drainage;
- Air conditioning condensate;
- Springs;
- Water from crawl space pumps;
- Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spill material has been removed) and where detergents are not used;
- Diverted stream flows;
- Flows from riparian habitats and wetlands;
- Uncontaminated water from foundations or from footing drains;
- Lawn watering;
- Dechlorinated swimming pool discharges;
- Uncontaminated groundwater;
- Water from individual residential car washing'
- Routine external building washdown (which does not use detergents or other compounds);
- Others as listed in the permit

Prohibited Discharges

Any drain or conveyance, whether on the surface or subsurface, that allows any non-stormwater discharge including sewage, process wastewater, and wash water

to enter the Municipality's separate storm sewer system or the Waters of the Commonwealth.

OFFICE PROCEDURES

Pollution Complaint Hotline

The public shall be made aware, through community involvement and outreach programs, the phone number or hotline for London Briatin Township, where citizens can easily report illicit discharge and pollution concerns. The hotline shall always be supported by prompt investigations of each complaint by trained inspectors, within 24 hours if possible. All efforts shall be made to provide considerable advertising and outreach to keep the phone number fresh in the public's mind. The following is London Briatin Township's main phone number and responsible personnel.

London Briatin Township main line - (610) 255-0388

-
- Carolyn Matalon, Secretary
- Ryan Mullin, Road Master

Pennsylvania Department of Environmental Protection, Southeast Emergency Reponse Number - (484) 250-5900

Training shall be provided to the Township Secretary, Road Master and others who might be involved with the IDD&E issues. Training shall include how to provide good customer service, the basics of illicit discharge identification and details of the tracking and reporting process.

During normal business hours (Monday - Thursday 9:30 am to 12:00 pm) calls can be made to the London Briatin Township office at (610) 255-0388.

After hours, emergency water quality incidents should be reported though Pennsylvania Department of Environmental Protection, Southeast Emergency Reponse Number - (484) 250-5900. Residents that encounter a non-emergency incident are encouraged to report the problem the next business day to the London Briatin Township office. If after hours messages are left on the Township's voicemail, staff shall follow up with the caller the next business day.

The following table provides a list of common illicit discharges reported and the likely source or situation.

Typical call-in indicators	Likely source
Sewage smell, or floatables from a storm drain outfall during dry weather flow	Storm and sanitary sewer cross connection
Small (<6" diameter) pipe directly discharging to receiving water	Straight pipe discharge from home or business
Greatly discolored or unnatural smelling liquid (often hydrocarbons) flowing from or pooling on the property or from outfall below property	Illegal dumping of chemicals or materials into the storm sewer system
Sewage smell; extra green vegetation; saturated ground	Failing septic or sewer system
Muddy water; sediment deposits from upstream construction site	Poor erosion and sediment control

When water quality incident reports are received, the staff person receiving the information shall complete a Water Quality Incident Report Form and submit it to Ryan Mullin for follow up. He will either follow the investigative procedures in the section entitled "Procedures for Identifying Source of Illicit Discharge", or if the source is known, he will follow the corrective action procedures in the section entitled "Procedures for Eliminating Illicit Discharge".

FIELD INVESTIGATION PROCEDURES

Identify Priority Areas

Outfall screenings shall be prioritized according to the perceived chance of illicit discharges within the outfall's contributing drainage area and the proximity of the receiving waters. The areas of highest priority shall be investigated for signs of suspicious activities or conditions, and shall be screened at least once a year.

Procedures for Screening Outfalls

The majority of the organized storm sewer system in the urbanized area provides drainage for residential, industrial and mixed use parcels and roadways, and contains older storm drainage infrastructure that consist mostly of localized inlets and roadside drainage ditches. Many of the outfalls are close to the roadway and can be checked by the London Briatin Township's road crew during normal Township maintenance.

Outfalls shall be screened during dry weather conditions. Any flow observed during these periods will likely reveal the presence of illicit discharges within the outfall's contributing drainage area.

If flow is present, the inspector will observe the flow and surrounding conditions, checking for odor, color, turbidity, sheen, floating/submerged solids, or any unusual features. If there is any indication of pollution, samples of the discharge will be promptly collected for testing, both on site and, if necessary, at a laboratory. The source of the discharge shall then be tracked back up through the storm sewer collection system serving the outfall, using mapping as a guide.

All observations and test results shall be recorded on the Outfall Reconnaissance Inventory Form, which shall be completed for each MS4 outfall, regardless of whether flow is observed or not.

All identified MS4 outfalls shall be screened at least once during each permit coverage term. For areas where past problems have been reported of know sources of dry weather flows occur on a continual basis, outfalls shall be screened annually.

During field inspections, observed spills or environmental hazards shall be immediately reported to Pennsylvania Department of Environmental Protection and the incident shall be documented using the Water Quality Incident Report Form. The Pa DEP will work with London Briatin Township to clean up and properly dispose of the spilled material.

Procedures for Identifying Source of Illicit Discharge

The primary field screening tool is the Outfall Reconnaissance Inventory (ORI), which is used to find illicit discharge problems and develop a systematic outfall inventory map of the MS4.

If the source of illicit discharge is traced back to an MS4 outfall, the responder shall attempt to track the discharge back through the storm sewer collection system serving that outfall.

The following table depicts some of the activities or land uses most likely associated with specific discharge problems:

Observed Discharge	Potential Causes
Clogging Sediment	Construction activity without proper erosion and sediment controls Roadway sanding operations Outdoor work areas or material storage areas
Thick Algae Growth	Fertilizer Leak or Spill Landscaping operations Hydroseeding following Construction Failing or leaking septic system
Oil	Refueling operations Vehicle or machinery maintenance activities
Sudsy discharge	Power washing of buildings Vehicle or equipment washing operations Mobile cleaning crew dumping Laundry or Cleaner Household greywater discharge
Clogged Grease	Restaurant sink drain connection to stormwater system
Sewage	Failing or leaking septic systems and overflows from public sewer systems

When visual inspections are not enough to isolate the source of the illicit discharge, a number of additional field tests can be performed, including dye testing, video testing and smoke testing.

Once the source of an illicit discharge has been identified, the investigator shall initiate private property site entry procedures (if needed), notify the property owner or operator of the problem, and provide the appropriate educational materials and/or a copy of the IDDE Ordinance or Standard Operating Procedure (SOP). The investigator shall complete the Incident Response Form, and enter all information in the database case log to document the findings.

Confirmed illicit discharge sources shall be referred to the follow-up actions and corrective action procedures described in the following section titled "Procedures for Eliminating Illicit Discharge."

Procedures for Eliminating Illicit Discharge

Once the source of the illicit discharge is identified, any and all available methods will be used to abate the source of the discharge. If the source of illicit discharge is from another municipality or state road, those agencies will be contacted and appropriate action shall be taken to assure compliance with the MS4 program. When voluntary compliance does not produce the desired result, London Britain Township is required to pursue follow-up enforcement action.

Illicit Discharge caused by sewage

One of the major illicit discharges found in a low-density development are failing septic systems. The most common and effective methods for detecting failing septic systems include homeowner surveys, surface condition analyses and detailed system inspection. In addition, the same type of sewage discharge in the storm sewer may be caused by leaking public sewer laterals, illegal cross-connections and overflow from public sewer systems

Private Property Access

If the illicit stormwater discharge is traced back to a private property that discharges to the municipal storm sewer system, the responsible person will be instructed to take immediate action to abate the discharge. Provisions shall be made by London Briatin Township to provide guaranteed right of entry to properties within the MS4 drainage area. If access is denied, the responder will contact other appropriate municipal staff such as the police department, and may contact the Department of Environmental Protection for assistance. Unconsented entry shall only be used where hazardous pollutants are clearly entering the storm sewer system or waterway from the subject property and no responsible party is available to permit entry.

Public Awareness and Participation

All efforts shall be made by the municipality to ensure public awareness and participation in the MS4 program. This includes the following:

- Deicing materials shall be kept to a minimum. Anti-skid materials shall be swept in the early spring in order to keep it out of the storm sewer pipes.
- Trash and dirt shall be swept periodically through the spring and summer. Recovered materials shall be properly disposed.
- Leaves shall be vacuumed in the fall to keep them out of the storm sewer pipes.
- Animal wastes shall be promptly disposed of.
- Stored materials (salt, mulch, gravel, etc.) shall be stored out of the weather as much as possible.
- Pesticides and herbicides shall be used as little as possible.
- Automotive maintenance fluids shall be prevented from entering the storm sewer system.
- Runoff from car washing and swimming pools shall be prevented from entering the storm sewer system.
- Vehicles shall be operated safely to prevent spillage of fuel or contents during accidents. Any spillage shall be cleaned up immediately to prevent their discharge into the storm sewer system. The Department of Environmental Protection, as well as Pennsylvania Fish and Boat Commission, shall be notified of any spillages.
- On-lot septic systems shall be properly maintained.

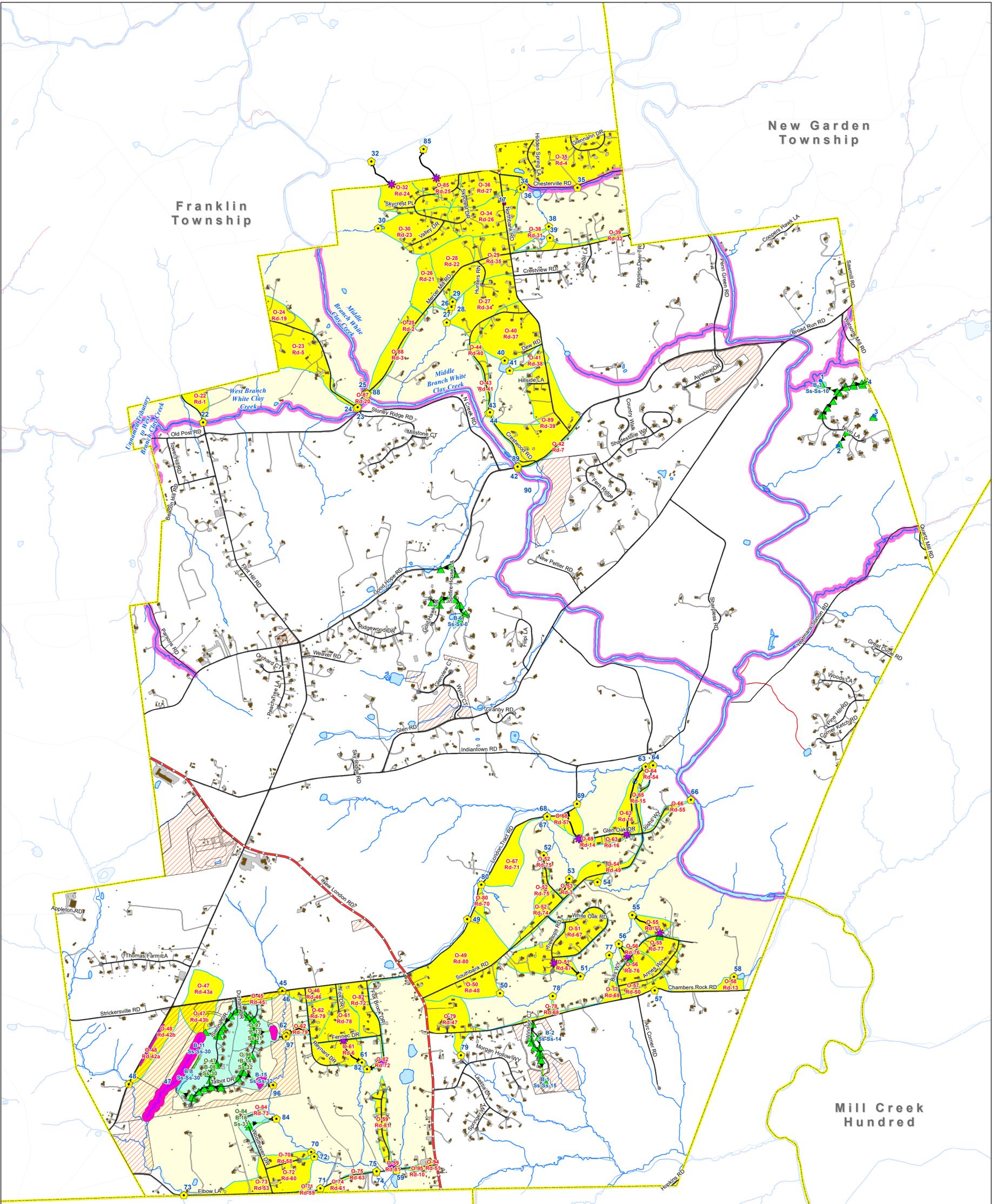
Program Documentation, Evaluation and Assessment

London Briatin Township is required to keep records of all stormwater program activities. Examples of the different types of information to be retained include:

- Citizen Complaints - retain Water Quality Incident Report forms
- Outfall Inspections - maintain Outfall Inspection Forms, catalog and organize photographs. Enter open case logs for suspected problem areas.
- Investigations - retain Incident Response forms, photographs, conversation records, and laboratory testing results.
- Corrective Action - in addition to the information collected during the investigation process, retain copies of compliance letters, correspondence with property owners, and proof of corrected problems such as contract and invoice for completed work or field investigation reports.

London Britain Township shall integrate a tracking system that monitors Outfall Reconnaissance Inventory (ORI) results, indicator monitoring, on-site investigations, dumping and spill sites, and hotline calls.

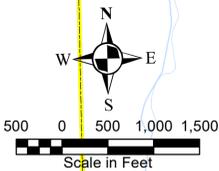
Each program component shall be reviewed annually by Township personnel and the Township Engineer.



Fair Hill MCD

Legend

- Observation Points
- MS4 regulated outfall
- Municipal Outfalls
- Private Outfalls
- State Outfalls
- Road Outfalls
- Storm Lines
- Swales
- Outfall Extensions
- BMPs
- Proposed_BMPs
- Sewersheds
- Uncontrolled Sewersheds
- Local Roads
- State Roads
- Road Buffer (300-ft.)
- Streams
- Impaired Streams
- Ponds
- 2010 Urbanized Area
- Tax Parcels
- Impervious Surface
- Building
- Road
- Other
- Twp_Owned_Lands



**London Britain Township,
Chester County, Pennsylvania**

**MS4 DRAINAGE AREA
WORK MAP**

FACILITY_ID	TYPE	MATERIAL	CONDITION	PIPE_DIAMETER	POINT_ID	NORTHING	EASTING	Longitude	Latitude	Inspection Date	Inspector's Name
LBT_O_1	Non-MS4				1	164151.1191	2527239.769	75° 45' 44.289" W	39° 46' 0.044" N		
LBT_O_2	Non-MS4				2	162830.5568	2527588.304	75° 45' 40.207" W	39° 45' 46.920" N		
LBT_O_3	Non-MS4				3	163442.4303	2528324.101	75° 45' 30.611" W	39° 45' 52.801" N		
LBT_O_4	Non-MS4				4	164173.8402	2528160.81	75° 45' 32.491" W	39° 46' 0.064" N		
LBT_O_17	Non-MS4				17	167736.005	2520850.714	75° 47' 5.064" W	39° 46' 36.876" N		
LBT_O_22	MS4 Regulated				22	163311.4377	2514771.507	75° 48' 24.153" W	39° 45' 54.490" N		
LBT_O_23	MS4 Regulated				23	163597.7593	2517870.692	75° 47' 44.395" W	39° 45' 56.643" N		
LBT_O_24	MS4 Regulated				24	163621.6182	2517890.077	75° 47' 44.140" W	39° 45' 56.875" N		
LBT_O_25	MS4 Regulated				25	163912.7357	2518068.792	75° 47' 41.769" W	39° 45' 59.712" N		
LBT_O_26	MS4 Regulated				26	165564.3204	2519732.483	75° 47' 20.000" W	39° 46' 15.665" N		
LBT_O_27	MS4 Regulated				27	165332.5495	2519690.817	75° 47' 20.599" W	39° 46' 13.384" N		
LBT_O_28	MS4 Regulated				28	165650.2579	2519787.171	75° 47' 19.275" W	39° 46' 16.500" N		
LBT_O_29	MS4 Regulated				29	165757.0286	2519813.212	75° 47' 18.912" W	39° 46' 17.551" N		
LBT_O_30	MS4 Regulated				30	167239.0949	2518306.251	75° 47' 37.786" W	39° 46' 32.525" N		
LBT_O_32	MS4 Regulated				32	168593.1581	2518168.257	75° 47' 39.169" W	39° 46' 45.933" N		
LBT_O_34	MS4 Regulated				34	168037.2347	2521183.002	75° 47' 0.723" W	39° 46' 39.779" N		
LBT_O_35	MS4 Regulated				35	168063.5332	2522333.002	75° 46' 45.990" W	39° 46' 39.785" N		
LBT_O_36	MS4 Regulated				36	168074.2655	2521252.251	75° 46' 59.826" W	39° 46' 40.129" N		
LBT_O_38	MS4 Regulated				38	167277.8009	2521750.165	75° 46' 53.678" W	39° 46' 32.151" N		
LBT_O_39	MS4 Regulated				39	167048.6954	2521773.282	75° 46' 53.447" W	39° 46' 29.882" N		
LBT_O_40	MS4 Regulated				40	164560.5812	2520861.486	75° 47' 5.831" W	39° 46' 5.500" N		
LBT_O_41	MS4 Regulated				41	164357.723	2520960.782	75° 47' 4.617" W	39° 46' 3.474" N		
LBT_O_42	MS4 Regulated				42	162385.9786	2521126.936	75° 47' 3.052" W	39° 45' 43.957" N		
LBT_O_43	MS4 Regulated				43	163495.7198	2520533.752	75° 47' 10.330" W	39° 45' 55.051" N		
LBT_O_44	MS4 Regulated				44	163519.0331	2520565.501	75° 47' 9.917" W	39° 45' 55.275" N		
LBT_O_45	MS4 Regulated				45	151803.1071	2516348.787	75° 48' 7.210" W	39° 44' 0.444" N		
LBT_O_46	MS4 Regulated				46	151805.8259	2516370.658	75° 48' 6.930" W	39° 44' 0.466" N		
LBT_O_47	MS4 Regulated				47	150015.2242	2514240.83	75° 48' 34.687" W	39° 43' 43.238" N		
LBT_O_48	MS4 Regulated				48	149916.3769	2513269.752	75° 48' 47.141" W	39° 43' 42.472" N		
LBT_O_49	MS4 Regulated				49	153254.158	2520103.501	75° 47' 18.751" W	39° 44' 13.959" N		
LBT_O_50	MS4 Regulated				50	151756.1269	2520768.999	75° 47' 10.661" W	39° 43' 59.013" N		
LBT_O_51	MS4 Regulated				51	152102.2036	2522391.252	75° 46' 49.803" W	39° 44' 2.075" N		
LBT_O_52	MS4 Regulated				52	154549.6889	2521651.002	75° 46' 58.578" W	39° 44' 26.419" N		
LBT_O_53	MS4 Regulated				53	154075.408	2522165.002	75° 46' 52.135" W	39° 44' 21.620" N		
LBT_O_54	MS4 Regulated				54	154006.439	2522735.752	75° 46' 44.851" W	39° 44' 20.813" N		
LBT_O_55	MS4 Regulated				55	153339.2356	2523439.751	75° 46' 36.032" W	39° 44' 14.065" N		
LBT_O_56	MS4 Regulated				56	152755.22	2523165.751	75° 46' 39.706" W	39° 44' 8.356" N		
LBT_O_57	MS4 Regulated				57	151815.4693	2523892.752	75° 46' 30.671" W	39° 43' 58.911" N		
LBT_O_58	MS4 Regulated				58	152087.6528	2525492.853	75° 46' 10.118" W	39° 44' 1.246" N		
LBT_O_59	MS4 Regulated				59	148198.8594	2518679.252	75° 47' 38.410" W	39° 43' 24.325" N		
LBT_O_60	MS4 Regulated				60	148174.5346	2518664.081	75° 47' 38.611" W	39° 43' 24.088" N		
LBT_O_61	MS4 Regulated				61	150353.4033	2517979.525	75° 47' 46.753" W	39° 43' 45.765" N		
LBT_O_62	MS4 Regulated				62	150948.7968	2516463.64	75° 48' 5.982" W	39° 43' 51.979" N		
LBT_O_63	MS4 Regulated				63	156344.9769	2523708.989	75° 46' 31.727" W	39° 44' 43.703" N		
LBT_O_64	MS4 Regulated				64	156374.6642	2523828.26	75° 46' 30.192" W	39° 44' 43.970" N		
LBT_O_65	MS4 Regulated				65	156369.2823	2523857.426	75° 46' 29.820" W	39° 44' 43.910" N		
LBT_O_66	MS4 Regulated				66	155671.5042	2524622.51	75° 46' 20.228" W	39° 44' 36.847" N		
LBT_O_67	MS4 Regulated				67	155330.8234	2521707.932	75° 46' 57.627" W	39° 44' 34.124" N		
LBT_O_68	MS4 Regulated				68	155330.3005	2521719.818	75° 46' 57.475" W	39° 44' 34.116" N		
LBT_O_69	MS4 Regulated				69	155590.7173	2522323.116	75° 46' 49.679" W	39° 44' 36.556" N		
LBT_O_70	MS4 Regulated				70	148542.7393	2516955.549	75° 48' 0.367" W	39° 43' 28.099" N		
LBT_O_71	MS4 Regulated				71	147807.3926	2517137.508	75° 47' 58.247" W	39° 43' 20.794" N		
LBT_O_72	MS4 Regulated				72	148446.7099	2517015.567	75° 47' 59.626" W	39° 43' 27.138" N		
LBT_O_73	MS4 Regulated				73	147663.8716	2514381.841	75° 48' 33.544" W	39° 43' 19.976" N		
LBT_O_74	MS4 Regulated				74	148131.721	2518270.083	75° 47' 43.665" W	39° 43' 23.751" N		
LBT_O_75	MS4 Regulated				75	148149.827	2518274.198	75° 47' 43.607" W	39° 43' 23.929" N		
LBT_O_77	MS4 Regulated				77	152528.6653	2522971.907	75° 46' 42.251" W	39° 44' 6.160" N		
LBT_O_78	MS4 Regulated				78	151699.6722	2521832.584	75° 46' 57.067" W	39° 43' 58.221" N		
LBT_O_79	MS4 Regulated				79	150497.4151	2519979.286	75° 47' 21.124" W	39° 43' 46.750" N		
LBT_O_80	MS4 Regulated				80	153954.4466	2520387.272	75° 47' 14.920" W	39° 44' 20.816" N		
LBT_O_82	MS4 Regulated				82	150221.5066	2518083.146	75° 47' 45.465" W	39° 43' 44.439" N		
LBT_O_84	MS4 Regulated				84	149211.9787	2516252.001	75° 48' 9.180" W	39° 43' 34.865" N		
LBT_O_85	MS4 Regulated				85	168844.6983	2519221.023	75° 47' 25.616" W	39° 46' 48.188" N		
LBT_O_86	MS4 Regulated				86	163884.1338	2518045.914	75° 47' 42.070" W	39° 45' 59.434" N		
LBT_O_87	MS4 Regulated				87	163865.664	2518057.787	75° 47' 41.923" W	39° 45' 59.249" N		
LBT_O_88	MS4 Regulated				88	163888.0914	2518082.853	75° 47' 41.596" W	39° 45' 59.465" N		
LBT_O_89	MS4 Regulated				89	162417.3782	2521121.853	75° 47' 3.108" W	39° 45' 44.268" N		
LBT_O_90					90	161857.4826	2521249.891	75° 47' 1.629" W	39° 45' 38.708" N		
LBT_O_94	MS4 Regulated				94	148198.9102	2518691.411	75° 47' 38.255" W	39° 43' 24.323" N		
LBT_O_95	MS4 Regulated				95	148176.0143	2518677.429	75° 47' 38.440" W	39° 43' 24.100" N		
LBT_O_96	MS4 Regulated				96	149899.623	2516185.769	75° 48' 9.834" W	39° 43' 41.673" N		
LBT_O_97	MS4 Regulated				97	150881.4452	2516447.278	75° 48' 6.210" W	39° 43' 51.317" N		

Appendix for MCM #4
Construction Site Storm Water Runoff Control

- **London Britain Township Construction Site Runoff Control Plan**
- **List of Grading and E&S Permits Reviewed**
- **List of Construction Site E&S Inspections**

**LONDON BRITAIN TOWNSHIP
CONSTRUCTION SITE RUNOFF CONTROL PLAN
Minimum Control Measure #4**

June 2024

Description

Polluted stormwater runoff from construction sites often flows to MS4s and ultimately is discharged into local rivers and streams.

Pollutants Commonly Found in Construction Site Runoff:

- Sediment
- Solids & Sanitary Waste
- Phosphorus (fertilizer)
- Nitrogen (fertilizer)
- Pesticides
- Oils, & Fuels
- Concrete Residue/Wash
- Debris

Of the pollutants listed, sediment is usually the main pollutant of concern. Sources of sedimentation include agriculture, urban runoff, construction, and forestry. Sediment runoff rates from construction sites however are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams that can be deposited naturally during several decades. The resulting siltation, and the contribution of other pollutants from construction sites, can cause physical, chemical, and biological harm to our waters.

The Construction Site Runoff Minimum Control Measure consists of Best Management Practices that focus on the reduction of pollutants to the MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of stormwater discharges from construction activities disturbing less than one acre will be considered if it is part of a larger common plan of development that would disturb one acre or more.

Described in this section is, the legal authority mechanism that will be used to require erosion and sediment controls; enforcement procedures and actions to ensure compliance; requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter and sanitary waste; procedures for site plan review which incorporate the consideration of water quality impacts; procedures for receipt and consideration of information submitted by the public; and procedures for site inspection and enforcement of control measures.

The stormwater regulations for Construction Site Runoff Control apply to privately-owned and MS4-owned and managed projects. Therefore, the goals described in this section have application to both types of projects.

Requirements

The Permit requires that an operator of a regulated small MS4 to develop, implement, and enforce a program to reduce pollutants in stormwater runoff to their MS4. The MS4 operator is required at a minimum to:

- Have an ordinance or other regulatory mechanism equivalent to the Chester County, PA Model Stormwater Management (SWM) Ordinance with sections specific for Stormwater Discharges from Construction Sites, requiring the implementation of proper erosion and sediment controls, and controls for other wastes, on applicable construction sites;
- Address stormwater runoff from construction activities that result in a land disturbance of greater than or equal to one acre, and those construction activities that are part of a larger common plan of development that would disturb one acre or more;
- Include a law, ordinance to require a SWM for each applicable land disturbing activity that includes erosion and sediment controls that meet the State's most current technical standards.
- Have procedures for site plan review of SWM that consider potential water quality impacts and consistency with State and local sediment and erosion control requirements.
- MS4 must also have trained individuals performing the reviews, all sites of one acre or greater must be reviewed and an MS4 Acceptance Form must be completed;
- Have procedures of site inspection and enforcement of control measures.
- Have sanctions to ensure compliance (established in ordinance or other regulatory mechanism);
- Establish procedures for the receipt and consideration of information submitted by the public (i.e. Complaints); and
- Describe procedures for site inspections and enforcement of erosion and sediment control measures including steps to identify priority sites for inspection and enforcement based on the nature of construction activity, topography, and the characteristics of the receiving waters.
- Educate construction site owner/operators, design engineers, municipal staff and other individuals to whom these regulations apply about the municipality's stormwater construction requirements.
- Ensure that construction site operators have received erosion and sediment control training before they do work within the MS4 and maintain records of that training.
- Establish and maintain an inventory of active construction sites, including the location of the site, owner/operator contact information;
- Develop, record, periodically assess and modify as needed measurable goals; and
- Determine the appropriate BMPs and measurable goals for this minimum control measure to ensure the reduction of all Pollutants of Concern (POCs) in stormwater discharges to the Maximum Extent Practicable.

Methodology

The London Britain Township has adopted a Stormwater Management Ordinance in 2023. This ordinance authorizes the Township to enforce a program that reduces pollutant runoff from construction sites.

The Township is responsible for:

- Reviewing SWMPs – with the aid of Town Engineering
- Inspecting Construction Sites
- Enforcing permit requirements on developers/owners/operators that do not comply with regulations.

The London Britain Township will also provide information on available training to developers, contractors, and design engineers in order to inform them of the regulations.

London Britain Township maintains an inventory of active construction sites, and inactive permitted construction sites. *Appendix A* ‘Construction Activity Permits’. The Township periodically reviews and updates the construction permit database.

Goals

Plan Review Goals:

- Amend the stormwater law as necessary to maintain the Pennsylvania stormwater standards and requirements as defined by the current or any future PADEP permits pertaining to stormwater management activities.
- Maintain, document, and further implement existing procedures for the public to request information, and to relay concerns to the representative of the municipality.
- Maintain, document, and further implement existing internal tracking and plan review procedures to cover the following issues:
 - Conformance to local stormwater regulations
 - Appropriate use of temporary erosion controls
 - Inclusion of any required local, state, and/or federal stormwater permit documents
- Provide training for any township representatives that will be completing the construction plan reviews for the township, including planning and zoning boards.
- Conduct SWMP review (with assistance from Township Engineer) for all sites within London Britain Township where disturbance is one acre or greater to ensure consistency with State and local sediment and erosion control requirements and complete the SWMP Acceptance Form.

- Educate the local construction community on the construction plans review process.
- Follow standard Township Approval Process and provide notice to the public that a project will be open for review and comment.
- Notify owners/operators of local construction sites who are in violation of the standards as defined by the General Construction Permit.
- Maintain records of plans reviewed and approved under this program.
-

Construction Inspection Goals:

- Maintain, document, and further implement existing inspection forms and procedures based on the adopted local laws regulating construction sites within London Britain Township that disturb one acre of land or more.
- Conduct and report on inspection procedures and educational efforts to familiarize township staff and the local construction community with local stormwater regulations relating to construction activities.
- Maintain, document, and further implement existing internal procedures for tracking new and on-going construction activities.
- Take action against owners and/or operators of local construction sites that are in violation of local construction stormwater regulations using the enforcement regulation outlined in the adopted local laws.
- Maintain records of construction site inspections, enforcement actions, and corrective actions.
- Educate municipal staff and the local construction community with regards to local inspection procedures.
- Inspect and maintain records of all construction sites where one acre of land or more is being disturbed using appropriate inspection procedures and forms to ensure compliance with local stormwater regulations.

Appendix for MCM #5
PCSWM in New Development

- **London Britain Township Post Construction Stormwater Management Plan (rev. 2024)**

- **List of PCSWM BMPs and Inspection Tracking Spreadsheet**

London Britain Township
Post-Construction Storm Water Management
June 2024

The Post Construction Storm Water Management Minimum control measure focuses on reducing the flow of pollutants from new impervious surfaces. Methods to treat, store, and infiltrate the flow onsite to keep the new flow from introducing pollutants.

Implement and Enforce Ordinance

Description: The Township Storm Water Management Ordinance governs post-construction storm water runoff. Storm water controls are inspected by the Township engineer during construction and when it is completed. This is complaint driven due to the number of employees.

Responsibility: Storm Water Coordinator

Frequency: When complaints are received

Ensure all Post-construction Storm Water Management BMP's are built as designed, operated and maintained properly

Description: All Storm Water management facilities are inspected by the Township engineer after they are completed to be sure they are operating and built correctly.

Responsibility: Storm Water Coordinator

Frequency: When facility construction is completed and when complaints are received

Operator-Owned Storm Water Management Inspection Procedures

Description: Operator owned storm water facilities built after June 3, 2004 will have a storm water facilities and best management practices operations and maintenance agreement and declaration of easement on file at the Township office which will describe the maintenance requirements for the storm water facilities that are the responsibility of the owner. It will include language permitting the Township to make corrective action as is necessary to bring the premises into compliance. This agreement will apply to any future owners of the premises.

Responsibility: Owner

Frequency: When facility is planned

Description: Operator owned storm water facilities built after January 19, 2023 (adoption date of new storm water ordinance) require an annual report be submitted to the Township documenting the inspection of all privately owned storm water facilities built after that date.

Appendix for MCM #6
Pollution Prevention & Good Housekeeping Programs
for Municipal Operations

- **London Britain Township Good Housekeeping**
- **London Britain Township Training Program**

**London Britain Township
Pollution Prevention/ Good Housekeeping for Municipal Operations**

June 2024

This control measure focuses on ensuring that the London Britain Township facilities and operations are managed in ways that minimize contamination to storm water discharges from the facilities. Facilities may include Township owned buildings, public works facilities and infrastructure. Operations and maintenance activities addressed may include: street and bridge maintenance, road salt storage and application, vehicle and fleet maintenance, storm water system maintenance, and pesticide and fertilizer applications.

Municipally Owned Storm Water Facilities

Description: Municipally owned storm water facilities are inspected at least once a year. Repairs and maintenance are completed as needed to prevent potential pollutants and debris from clogging the system.

Responsibility: Road master

Frequency: Annually

Municipal Vehicle/Equipment Operation & Maintenance

Description: Basic work is done on the trucks and equipment in the maintenance building with concrete floors by public works employees. Oil dry and absorbent mats are available in case of any leakage. Spill control kits are kept on hand at the building and training is given to all employees on how and when to use the spill control kits. Containment pallets are available to catch oil at the shop and the salt shed. Oily rags go into a bucket until taken for cleaning. Oily rags are sent to the uniform company for cleaning. Oil dry gets picked up and put in trash container. Drain pans are used to catch oil and put into a large container to be taken to Fisher's garage. All trucks are washed at a designated Car Wash. Tractors, loaders, backhoe and mowers are washed at the shop. Any grease that falls off in lumps are picked up and disposed of in the trash.

Responsibility: Roadmaster

Frequency: On going

Training for Municipal Employees

Description: Training is provided to public works employees and documentation kept on each training event for:

- Recognition and reporting of illicit discharges

- Good housekeeping and pollution prevention in and around the maintenance and public works facilities

- Good housekeeping and pollution prevention to be employed during road, street and parking lot maintenance

- Good housekeeping and pollution prevention to be employed around recreational facilities

- Emergency response employees will have training in spill responses.

Responsibility: Roadmaster
Frequency: Annually and on going

Conveyance System Inspection and Cleaning Program

Inspect and clean all conveyance system structures (including ditches, piping, basins and manholes) on a regular basis to remove potential pollutants and debris, prevent clogging of the system, restore system capacity and ensure the system functions properly.

Responsibility: Roadmaster
Frequency: On going

Street Sweeping Program

Streets and parking areas will be swept by a professional street sweeping company to prevent or reduce the discharge of pollutants from roadways, streets and parking areas. Roads to be swept are posted two days prior to the date of sweeping to have vehicles removed. Street sweepings are stored in an enclosed building with concrete floors. Sweepings from the stone are then disposed of at a landfill by a trash hauler.

Responsibility: Roadmaster
Frequency: On going

De-icing Materials Application and Storage Program

Salt is currently stored in a building with concrete floors and walls with a roof and sliding doors. There is a concrete apron extending away from the building to a stoned storage area. A diked area is downhill from the salt shed to catch any salt or stone runoff that may occur. Any spillage is cleaned from the concrete area after usage. The minimum amount of salt necessary is used for deicing. Regularly scheduled street sweeping is done in the spring to remove the materials from roadways and parking lots to prevent it from entering the storm sewer system. Whenever possible, snow stockpiles are stored in a way that they do not block storm water inlets and away from environmentally sensitive areas such as streams, lakes and swales.

Responsibility: Roadmaster
Frequency: On-going

Spill Prevention Control and Countermeasure Plan

A spill prevention control and countermeasure plan has been developed for the Township and is updated regularly. The plan is implemented to reduce the risk of hazardous material entering the storm sewer system and the waterways within the Township.

Responsibility: Roadmaster/ Road Crew
Frequency: On-going

Hazardous Materials and Chemical Storage

Inspect and evaluate storage locations and the method of storing hazardous materials and chemicals to ensure compliance with State and EPA regulations and to ensure proper disposal of these materials. Have hazardous materials identified. Monitor the inventory for opportunities to reuse, recycle or reduce the amount of the hazardous materials used by the Township. Report the spills as they occur and clean them up as is appropriate. Spill training is given to employees who use any of the hazardous materials. Hazardous materials are disposed of at LCSWM.

Responsibility: Roadmaster

Frequency: On-going

Oil and Antifreeze Recycling

Collect used oil and antifreeze. Used oil and antifreeze is taken to a designated garage. Spills are cleaned up with appropriate spill materials.

Responsibility: Roadmaster

Frequency: On-going

Storage of Erodible Materials

Monitor the locations where erodible materials are being stored on Township property to check for the possibility of storm water pollution. Prevent the storage of erodible materials from causing storm water pollution. A minimal amount of erodible materials are kept at the storage yard. Stone is kept on a stone based lot with a concrete wall behind it to retain a grass area along one side and a retaining dike down grade from the pile to catch any runoff.

Responsibility: Roadmaster

Frequency: On-going

Fertilizer & Pesticide Application

The application of fertilizers and pesticides is conducted by a contractor licensed in accordance with Pennsylvania state law for applying fertilizers and pesticides. The minimum amount of fertilizer and pesticide is applied to get the job done.

Responsibility: Roadmaster

Frequency: On-going

Storage of Asphalt

When asphalt is removed from a road during repairs, the asphalt is hauled to the storage area to stockpile it until it can be taken to be recycled at the designated paving company. The storage area is stone based with a concrete jersey barrier wall behind it so nothing gets into the grass. There is a dike down grade as well to catch any possibility of run off.

Responsibility: Roadmaster

Frequency: On-going

Storage of Paint

Paints are stored on a shelf at the shop. It is mostly spray paint or household paint. We do not have any containers for line painting. The line painting is contracted out each year. Painter thinner is stored above spill containment pallets with absorbent pads under the containers.

Responsibility: Roadmaster

Frequency: On-going

Storage of Equipment

All equipment is stored inside a building. Floors are cleaned up fairly regularly. IF there are any leaks, oil dry or absorbent mats are used to clean it up. Spill containment kits are in the building for use as needed.

Responsibility: Roadmaster

Frequency: On-going

Storage of Pipe

Pipes which are being replaced are taken back to the storage yard and placed alongside the berm of the diked area to contain any run off or pollutants. They are taken to a recycling center periodically.

Responsibility: Roadmaster

Frequency: On-going

Painting Policy

Drop cloths or cardboard are used to help reduce small spills. Spills are to be wiped up right away with rags or paper towels which are to be disposed of in the dumpster in a way that they can dry. Empty paint cans are cleaned and then disposed of in the dumpster. Oil base paints are cleaned up with mineral spirits and then put in a container to be disposed. Unused paint is spread on cardboard and allowed to dry and then the cardboard is disposed of in the dumpster.

Responsibility: Roadmaster
Frequency: On-going

Building and Grounds Policy

The primary goal is to prevent pollution run off while working on the buildings. Appropriate measures are used to prevent soap and oil run off from getting into the water ways. Drop cloths are used while painting to catch spills. While mowing, any leaks are cleaned up promptly as you would a spill of that particular item.

Responsibility: Roadmaster
Frequency: On-going

Road and Street Maintenance

Road maintenance is done in the summer months. When repairing road surfaces, if the paving is cut and excavated, silt is swept up prior to the end of the day to prevent silt from running into the storm drains or streams.

All line painting is contracted out and we don't paint when the roadways are wet or rain is expected. Paint is loaded in the Township parking lot away from drains.

Oil and chip surfacing of the roads is contracted out. Contractors use the minimal amount of materials to complete the job.

Responsibility: Roadmaster
Frequency: On-going

Winter Road Maintenance

A minimal amount of salt necessary to deice the roads is used, taking into account temperature. Whenever possible, snow stock piles are placed away from storm water inlets and streams. Salt spreaders are calibrated to ensure proper application. Vehicles are washed after salting operation at a local car wash if possible and are stored inside.

Responsibility: Roadmaster
Frequency: On-going

Procedures for oily rags

Oily rags are placed in a bucket at the Township garage to be sent off weekly for cleaning.

Responsibility: Roadmaster
Frequency: On-going

Oil Change policy

Vehicle oil is changed in the Township maintenance shop. Oil is drained into a tub. When the oil change is complete, the waste oil is drained into waste oil drums. All oil drums are stored on an approved drum dike in the shop. When the drums are full, they are taken to the designated garage to use in their waste oil furnace. Oil dry and pig absorbing mats are nearby if needed for spills. Documentation is received for oil taken to the garage. Plastic qt oil bottles are drained and put in the dumpster.

Responsibility: Roadmaster

Frequency: On-going

Oil spills

Each truck has a spill kit on board. When there is a major leak, containment socks, oil dry and absorbent pig pads are used. Oily pads go into a bucket for disposal. Excess oil from the pads are dumped into a waste oil drum at the shop. Each garage where equipment is stored has large containment kits. Waste oil drums contents are disposed of at the designated garage.

Responsibility: Roadmaster

Frequency: On-going

Oil Storage

All oil drums are stored on a spill containment pallet in the maintenance building. Quart containers sit on a shelf above a containment pallet with pig absorbent mats under the containers of oil.

Responsibility: Roadmaster

Frequency: On-going

Oil Change Equipment

Filters and hoses are drained into waste oil drums. Waste oil drum has a drum funnel to properly drain items into. Once all the oil is drained, the filters and hose are put in the dumpster. Waste oil is taken to the garage for disposal. Oil is changed inside the maintenance garage. Leaking vehicles are addressed when it is discovered they are leaking. Drip pans are placed under leaking vehicles until they are fixed. Clean-up materials are provided in a readily available location. Dry cleaning methods are used where leaks have collected on ground surfaces.

Responsibility: Roadmaster

Frequency: On-going

Fueling Equipment and Trucks

All equipment and vehicles are monitored as they are filled. Tanks are not overfilled or “topped” off. If there is a spill, oil dry or containment pads are used to clean the spill. Only fueling takes place in the fueling area. Components are inspected for corrosion, leaks damage regularly and replaced as needed. Leaking vehicles are addressed as necessary. Tanks are located on concrete and fueling area is stoned in to minimize contamination. Above ground tanks are supplied with suitable secondary containment. Spill clean- up supplies are readily available at the fueling area. Fueling is done on a concrete slab.

Responsibility: Roadmaster

Frequency: On-going

Trash Removal

Trash is placed in the dumpster and the dumpster is emptied periodically by the designated Disposal Service.

Responsibility: Roadmaster

Frequency: On-going

Inspection of Storm Water Facilities

Storm water inlets are inspected during cold weather when a warmer spell is expected to facilitate snow melt run off. They are also inspected at various times after large storms in other weather. Inlets are marked for cleaning and vacuuming as needed.

Detention basins, swales and ditches are inspected annually to check for sediment accumulation, trash and weeds. These are cleaned out as needed to allow water to continue to move.

Responsibility: Roadmaster

Frequency: On-going

Inspection of Parks

Parks are inspected weekly during the warmer weather months and bi-weekly during the colder weather months and debris is cleaned up in park as well as in parking lots and in culverts.

Responsibility: Roadmaster

Frequency: On-going

Inspection of Parking Lots

Parking lots are inspected several times a year. They are swept in the spring, if needed. Sweepings are disposed of at landfill by a hauler.

Responsibility: Roadmaster

Frequency: On-going

London Britain Township
Training Program for Employees
June 2024

Training shall be designed specifically for different departments and their duties and daily operations and how those duties and operations relate to stormwater management. The Township will document training activities, employees in attendance, and other applicable information. The objective is to train municipal employees on stormwater management and various ways to minimize or prevent pollutant discharges.

Training shall be designed to include the following

1. Annual training to public works personnel in the recognition and reporting of illicit discharges
2. Annual training to public works personnel in good housekeeping and pollution prevention practices that are to be employed during road, street, and parking lot maintenance.
3. Annual training to public works personnel in good housekeeping and pollution prevention practices that are to be employed in and around maintenance and public works facilities.
4. Annual training to public works personnel in good housekeeping and pollution prevention practices that are to be employed in and around recreational facilities.
5. Public Works personnel shall have training in spill response.
6. Office and public works personnel shall have training in how to respond to a complain regarding an illicit discharge.

Keep documentation on each training event including training date, number of employees attended, and the objective of the training event for a period of three years after each event

February 2015