

BUFFALO TOWNSHIP
Butler County, Pennsylvania

MS4 PROGRAM

November 10, 2021

MCM #1: Public Education and Outreach Program (PEOP)

Buffalo Township has elected to implement MCM #1: Public Education and Outreach Program as provided in DEP's Stormwater Management Program (SWMP) Individual Permit, Appendix A.

Buffalo Township herein establishes this as the written PEOP Plan and is implementing a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

Buffalo Township will develop and maintain a target audience list of groups that are present in the MS4 area. The list will include residents, businesses, developers, schools and municipal employees. The list will be reviewed and updated as necessary annually. The list will be prepared in spreadsheet form for recording and tracking the information and to allow preparation of a mailing list.

Buffalo Township will publish annually a pamphlet, flyer or website listing general stormwater educational information regarding the SWMP. The publications will be reviewed and updated as necessary annually. Publications will include references or links to PADEP or USEPA and other sources to obtain stormwater management information.

Buffalo Township will annually distribute stormwater fact sheets and educational materials to the target audience list. Educational materials will also be posted at the Township Building for all occupants and public meeting attendees to receive or observe.

Buffalo Township will review and update the PEOP upon preparation and submission of the MS4 Periodic Reports.

MCM #2: Public Involvement and Participation Plan (PIPP)

Buffalo Township has elected to implement MCM #2 Public Involvement and Participation Plan as provided in DEP's Stormwater Management Program (SWMP), Individual Permit, Appendix A.

Buffalo Township herein establishes and implements this as the written PIPP Plan. The goal of the Plan is to provide opportunities for the public to participate in the decision-making processes associated with the development, implementation, and update of programs and activities related to the MS4 Stormwater Management Program.

Buffalo Township will hold one public meeting per year with a dedicated opportunity for the public to participate and provide input relative to stormwater management. Buffalo Township will invite watershed associations, environmental organizations, and the conservation district to participate in the stormwater meeting.

Buffalo Township will publish the MS4 Periodic Report on the Township website.

Buffalo Township will review and/or update the PIPP upon preparation and submission of the MS4 Periodic Reports.

Buffalo Township will advertise and update the Township's Stormwater Management Ordinance Number 134-2018 as needed to comply with MS4 requirements.

Buffalo Township will invite the target audience groups to participate and provide input regarding the SWMP at the public meetings. Attendance and activities will be documented.

Participants will be encouraged to provide public involvement and participation, and to report suspected illicit discharges and to assist in implementing best management practices.

MCM #3: Illicit Discharge Detection and Elimination (IDD&E)

Buffalo Township has elected to implement MCM #3 the Illicit Discharge Detection and Elimination Plan as provided in DEP's Stormwater Management Program (SWMP), Individual Permit, Appendix A.

Buffalo Township herein establishes and implements this as the written IDD&E Plan. The goal of the Plan is to develop, implement and enforce a program to detect and eliminate illicit discharges into the MS4.

Buffalo Township will develop a storm sewer system map, showing the location of all outfalls and the names and locations of all surface waters of the Commonwealth that receive discharges from those outfalls. Buffalo Township, to the extent allowable under State or local law, effectively prohibits, through ordinance, or other regulatory mechanism, non-stormwater discharges into the storm sewer system and establishes appropriate enforcement procedures and actions. Buffalo Township establishes a plan to detect and address non-stormwater discharges, including illegal dumping, to the Township system. Buffalo Township will inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

Buffalo Township's IDD&E Plan includes dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges or selected chemical and biological parameters. Test results are to be used as indicators of possible discharge sources.

Buffalo Township will prepare a storm sewer collection system and MS4 outfall map. The map will show the location of all outfalls and the locations and names of all surface waters of the Commonwealth that receive discharges from those outfalls. Maps will be updated and maintained thereafter.

Buffalo Township will field screen 20% of its outfalls annually. Priority areas will be established with a higher likelihood of illicit discharges to be screened yearly or more frequently depending on varying seasonal or meteorological conditions. Inspections will be performed on all stormwater BMPs required by the Grading Permit or Stormwater Management Ordinance.

Buffalo Township will investigate and attempt to identify the source of an illicit discharge. Upon indication or notification of a potential illicit discharge or a stormwater management complaint being filed or received by Buffalo Township, the Township will immediately inspect, investigate and trace the upstream watershed to identify the source of an illicit discharge and determine, if possible, the responsible party so proper notification can be made to initiate a resolution to the situation.

Buffalo Township will notify the landowner or occupant of an illicit discharge and require remedial action as per the Ordinance. Enforcement action will be implemented if necessary.

A summary of the yearly outfall screenings will be prepared that will contain the results of outfall screenings and actions taken to remove or correct illicit discharges. The summary will be included with the Annual Report. The results of the outfall screenings will be evaluated, and an assessment made if further screening or action is required.

Buffalo Township will notify PADEP, if necessary, when an illicit discharge is discovered.

Section 902, Right-of-Entry of the Buffalo Township Stormwater Management Ordinance Number 134-2018, provides authorization to access private property to implement the SWMP.

Records and documentation will be kept for at least a five-year period of all activities related to the IDD&E program. Inspection reports, complaints, assessments and follow-up are to be tracked.

MCM #4: Construction Site Stormwater Runoff Control

Buffalo Township relies on Pennsylvania's statewide program for stormwater associated construction activities to satisfy this MCM.

Buffalo Township adopted Stormwater Management Ordinance #134-2018; it was adopted on July 11, 2018.

MCM #5: Post-Construction Stormwater Management in New Development and Redevelopment (PCSM)

Buffalo Township has elected to implement MCM #5 – Post-Construction Stormwater Management in New Development and Redevelopment as provided in DEP’s Stormwater Management Program (SWMP), individual permit, Appendix A.

Buffalo Township herein establishes and implements this as the written PCSM Plan. The goal of the Plan is to develop, implement and enforce a program to ensure that controls are in place that would prevent or minimize water quality impacts from run-off from new developments and redevelopment projects.

Buffalo Township will rely on Pennsylvania’s statewide program for MCM #5 – BMPs #1, #2 and #3.

Buffalo Township relies on the Butler County Conservation District (BCCD) and PADEP for oversight and inspections on projects of one acre or more of disturbance where an NPDES Permit is required.

The Buffalo Township Stormwater Management Ordinance required installation of stormwater management facilities for all development or redevelopment projects which create 500 square feet or more of new impervious surfaces.

The Ordinance sets forth minimum requirements and criteria for selecting and sizing structural and non-structural stormwater BMPs.

The procedure adopted by Buffalo Township is for all developers to submit a stormwater management design along with a required grading permit application for all projects which create 500 square feet or more impervious surfaces. The procedure also includes on-site inspections of the stormwater facilities by the Township Engineer and a tracking system which tracks the inspections.

Buffalo Township has adopted, enacted, implements and enforces Stormwater Management Ordinance Number 134 of 2018.

Buffalo Township encourages Low Impact Development (LID) in new and redevelopment projects. Section 301R of the Stormwater Management Ordinance encourages LID. The Pollutant Reduction Plan includes retrofitting of existing stormwater management facilities.

Buffalo Township herein establishes that owners of Post-Construction Stormwater Management BMPs are required to properly operate and maintain the BMPs in accordance with established operations and maintenance (O&M) agreements, grading permit requirements, Stormwater Management Ordinance requirements and PA Stormwater Best Management Practices Manual most recent edition requirements.

Buffalo Township herein establishes a procedure which includes performing inspections on stormwater management projects. Projects classified by the Stormwater Management Ordinance as small development projects shall be inspected at the time of initial installation and inspected at subsequent times if it is determined that the system malfunctions, is not maintained or an illicit discharge occurs. In addition, all other stormwater management projects required by the Stormwater Management Ordinance shall be inspected yearly and inspected at subsequent times if it is determined that the system malfunctions, is not maintained or an illicit discharge occurs.

The goal of the inspections shall be to ensure that the stormwater BMPs are properly operated and maintained. This program includes sanctions and penalties for non-compliance as detailed, described and adopted in Section 1001, 1002, 1003, 1004, 1005 and 1006 of the Stormwater Management Ordinance.

The inspection program shall be reviewed and updated annually and shall continue to implement this BMP.

Buffalo Township herein establishes a procedure which includes creating an inventory. An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under the permit as development projects are reviewed, approved and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory shall include:

- a. All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003;
- b. The exact location of the PCSM BMP (e.g., street address);
- c. Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- d. The type of BMP and the year it was installed;
- e. Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources;
- f. The actual inspection/maintenance activities for each BMP; and
- g. An assessment by the permittee if proper maintenance occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.

Buffalo Township will develop a single system that supports recording and tracking the information specified in this program.

For portions of the Buffalo Township MS4 located in, or discharging to Waters of the Commonwealth, including wetlands, that have an existing or designated use that qualifies as either “High Quality Waters” or “Exceptional Value Waters” under 25 Pa. Code Chapter 93 of DEP’s regulations, this inspection program for this MCM, as written and as implemented, has the goal of ensuring to the best ability possible that stormwater discharges from new development or redevelopment into that portion of the regulated small MS4 will not cause or contribute to degradation of the quality of the receiving waters.

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MCM #6: POLLUTION PREVENTION/GOOD HOUSEKEEPING

MS4 STORMWATER FACILITY
OPERATIONS AND MAINTENANCE PROGRAM
NOVEMBER 10, 2021

Buffalo Township has elected to implement MCM #6 – Pollution Prevention/Good Housekeeping as provided in DEP’s Stormwater Management Program (SWMP), Individual Permit, Appendix A.

Buffalo Township herein establishes and implements this as the written Pollution Prevention/Good Housekeeping Operation and Maintenance Program Plan. The goal of the Plan is to develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations (40 CFR Part 122.34(b)(6)(i)). Provide employee training to prevent and reduce stormwater pollution from activities such as parks and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance (40 CFR Part 122.34 (b)(6)(i)).

The following Best Management Practices (BMPs) are to be implemented:

BMP #1: Identify and document all facilities and activities that are owned or operated by the permittee and have the potential for generating stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee. Activities may include the following: street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn/grounds care; general storm sewer system inspections and maintenance/repairs; park and open space maintenance; municipal building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures. Facilities can include streets; roads; highways; parking lots and other large paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances (open and closed pipe); riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).

This program shall be reviewed and updated each year of permit coverage, as needed. Part of this effort shall include maintaining a basic inventory of various municipal operations and facilities.

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Operations and Maintenance procedures, policies and practices shall include the following:

Stormwater Facilities

- Inspect all municipally-owned stormwater facilities including storm sewers, headwalls, inlets, endwalls, outfalls, ditches, culverts, roads and bridges to determine if they need cleaning and note any repair needs.

Inlet maintenance: If the depth of deposits is greater than or equal to one-third the depth from the basin bottom to the invert of the lowest pipe or opening into or out of the basin, have the catch basin cleaned as soon as possible. Inspect catch basins in which debris significantly exceeds the one-third depth standard twice annually. Dispose of sediment and debris removed from catch basins in a proper manner.

- Complete an inspection report to document current conditions and identify any needed maintenance or repairs needed for the facility to function properly. Maintain written records of inspection results and maintenance performed.
- Determine a priority list of facilities that need repairs or maintenance.
- Perform maintenance on facilities on a most critical needs basis.

- Roadways and Bridges

Inspect at least annually to determine if sediment or pollutants have accumulated on the roadways or bridges. Schedule debris removal, street sweeping and required maintenance.

- Antiskid Storage and Application

Regulate the amount of material applied to reflect site specific characteristics, such as road width and design, traffic concentration, and proximity to surface waters. Maintain a protective barrier around antiskid storage area to protect streams and waterways.

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Vehicle Maintenance, Fueling and Washing

- Fueling
 - Watch the transfer of fuel constantly to prevent overfilling and spilling.
 - Discourage “topping off” of fuel tanks through training and posting signs.
 - Avoid cleaning fueling areas with running water. Consider using a damp cloth on the pumps and a damp mop on the pavement rather than a hose.
 - Control spills immediately. Small spills can be cleaned up with rags and larger spills can be cleaned with dry absorbent material such as kitty litter, straw or sawdust. **Do not wash petroleum spills into the storm drain.**

- Maintenance
 - Make proper disposal of greasy rags, oil filters, air filters, batteries, spent coolant, degreasers, etc. easy by providing appropriate receptacles. Locate waste and recycling drums in properly controlled areas off the yard, preferably areas with a concrete slab and secondary containment.
 - Avoid hosing down work areas.
 - Put leaking vehicles coming in for service under cover or immediately place drip pans under them.
 - Collect leaking or dripping fluids in drip pans or containers.
 - Keep a drip pan under the vehicle while you unclip hoses, unscrew filters, or remove other parts.
 - Do not pour liquid waste into floor drains, sinks, outdoor storm drain inlets, or other storm drains or sewer connections.
 - Place oil filters in a funnel over the waste oil recycling or disposal collection tank to drain excess oil before disposal, then crush and recycle oil filters.

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- Washing
 - If possible, utilize commercial car washes.
 - Create and use designated cleaning areas, preferably indoors where wash wastewater can be recycled or directed to treatment. If indoor washing is not possible, create specific areas to wash cars on gravel, grass, or other permeable surfaces.
 - Block off storm drains while washing or use an insert to catch wash water. Make inserts and dams available.
 - Convert to use of phosphate-free biodegradable detergents.
- Materials to be Kept on Hand at Township Building
 - Dry absorbent material (e.g., kitty litter, straw, or sawdust) for cleaning up spills.
 - Receptacles for disposal of oily rags, used filters, batteries, spent coolants, degreasers, etc.
 - Drip pans for fluid collection and recycling.

Procedures for proper disposal are herein set forth:

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| • Dredge Spoil | If contaminated, to approved landfill; if clean, to approved fill site |
| • Accumulated Sediments | If contaminated, to approved landfill; if clean, to approved fill site |
| • Street Sweepings | If contaminated, to approved landfill; if clean, to approved fill site |
| • Trash | Local DEP licensed waste hauler |
| • Household Hazardous Waste | Local DEP licensed waste hauler with approval for hazardous waste |
| • Used Motor Oil | Approved Waste Oil Recycling Facility |
| • Other Debris | Approved DEP licensed waste hauler |

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Employee Training

- Buffalo Township has elected to implement a training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from municipal operations to the regulated MS4s. Training will include the use of training materials that are available from federal, state or local agencies or other organizations such as the Pennsylvania Southwest Commission Water Resource Center. Training may include municipal employees or subcontractors employed by the Township. Training could include public works staff, building, zoning, code enforcement staff, engineering consultants, administrative staff, elected officials, police and fire responders, volunteers and contracted personnel. Training topics will include operation, inspection, maintenance and repair activities associated with the municipal operations and facilities that have the potential to generate storm water runoff to the regulated MS4. Utilization of the Quick Resource Guide to the MS4 Program and the Quick Resource Guide for Winter Maintenance BMPs published by Pennsylvania Southwest Commission Water Resource Center will be a guide and basis for training and reference. DEP Municipal Separate Storm Sewer System MS4 Illicit Discharge Detection and Elimination IDD&E Checklist and the MS4 Outfall Field Screening Report will also be utilized as a guide and basis for training.
- Topics of training shall be as listed herein:
- Municipal Facility Examples:
 - Streets, roads, highways and parking lots
 - Maintenance and storage yards
 - Waste transfer stations
 - Parks
 - Fleet or maintenance shops
 - Wastewater treatment plants
 - Stormwater conveyances (open and closed)
 - Riparian buffers
 - Stormwater storage or treatment units (e.g., basins, constructed wetlands, etc.)

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- Municipal Activity Examples:
 - Street sweeping
 - Snow removal/deicing
 - Inlet/outlet cleaning
 - Lawns/grounds care
 - Storm system maintenance, inspection and repair
 - Park and open space maintenance
 - Municipal building maintenance
 - New construction and land disturbances
 - Right of Way maintenance
 - Vehicle maintenance, operation, fueling and washing
 - Material transfer operations, including leaf/yard debris pickup and disposal procedures

- Training will be held annually, with documentation in writing of the topics covered, date and attendance, and presenter listed. The training program will be reviewed annually and edited as necessary.