

2007 NORTHEAST NPDES PERMIT

*Summarized Goal of Permit: **Authorizes discharges from a facility** known in this case as Northeast Water Pollution Control Plant - Site ID No. 451953, located at 3899 Richmond Street, Philadelphia, Philadelphia County to the Delaware River Estuary Zone - 3 (**Outfall 001, CSO Outfalls 002-008, 010-022, and 058**), Pennypack Creek (CSO Outfalls 023-027), Tacony Creek (CSO Outfalls 028-041 and 059) and Frankford Creek (CSO Outfalls 042-052, 054-057, 060, and Stormwater Outfall 061) in Watershed 3J **in accordance with effluent limitations, monitoring requirements and other conditions** set forth in Parts A, B and C hereof.*

Note that for the NE NPDES permit, PWD reports under Part C Section 28 (Combined Sewer Overflows) Subsections I, II, and III (pages 29-41).

Also, note that the permit is currently expired, but that PWD is still regulated under the permit through an extension. This permit (along with the Stormwater Permit) is under negotiation; the Northeast permit went into the public notice process recently (8/1/2015).

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM DISCHARGE REQUIREMENTS FOR PUBLICLY OWNED TREATMENT WORKS (POTWs)

PART C Section 28, Subsection II

In accordance with the U.S. EPA's National CSO Control Policy, the permittee shall implement the Nine Minimum Controls (NMCs) that are described in that policy. The NMCs are low cost technology-based actions that can reduce CSO pollutant discharges and their effects on receiving waters. (The NMCs also tend to be actions that are ongoing and perpetual in nature).

NMC 7: Pollution Prevention

The permittee shall continue to develop and share, in conjunction with its watershed partnership stakeholders, a variety of public information materials concerning the CSO LTCP in relation to watershed education, resident stewardship, and watershed planning implementation. These materials shall include, but not be limited to fact sheets, press releases, tabletop exhibits, brochures, videos, watershed surveys, websites, reports, and presentation materials. The permittee shall continue to maintain its watershed management and source water protection partnership websites to encourage pollution prevention. Examples of such would be:

- www.phillyrivercast.org <<http://www.phillyrivercast.org>>
- www.phillyriverinfo.org <<http://www.phillyriverinfo.org>>
- www.schuylkillactionnetwork.org <<http://www.schuylkillactionnetwork.org>>

The permittee shall continue to provide annual information to city residents about its programs via such traditional PWD publications as the Waterwheel newsletter, monthly bill stuffers, and its Consumer Confidence Report (CCR). The permittee will also develop and publish, via traditional printing or on-line, additional public education materials, and updates as it sees fit. The permittee shall continue to support the Fairmount Water Works Interpretive Center.

NMC8: Public Notification to Ensure that the Public Receives Adequate Notification of CSO Occurrences and CSO Impacts:

The permittee shall launch a proactive public notification program (Early Warning System) using print, audio, video, internet media, and where accessible to the public, CSO outfall signage to indicate locations of CSOs, information on hazards, and public actions.

The permittee shall expand its internet-based notification system (River Cast) that predicts potential levels of pathogens in the Schuylkill River to the tidal section of Lower Schuylkill River, and evaluate this method for public notification of CSO impacts on recreational uses.

PART C Section 28, Subsection III

C. Watershed Based Management

The DEP recognizes that the permittee spent the last permit cycle demonstrating a comprehensive, watershed management planning process. The permittee has developed Integrated Watershed Management Plans for the Cobbs Creek and for the Tookany-Tacony-Frankford Creek. The permittee has also developed five-year implementation plans based on the recommendations of the Integrated Watershed Management Plans. These five-year implementation plans are available as separate documents. The permittee has already begun implementation according to these plans.

By PID+60 months, the permittee shall have continued to apply the watershed management planning process and produced an update to the watershed implementation plans to reflect implementation progress, new monitoring information, and changes to the implementation plan and schedule. The progress made with respect to implementing the watershed plans shall be documented in the annual CSO status report.

As part of its implementation of the Long Term Control Plan (1997), the permittee will carry forward its broad goals for LAND (Wet Weather Source Control) and WATER (Ecosystem Restoration and Aesthetics) according to sub-sections A and B below, and in addition will carry out other watershed projects as described in sub-section C.

I. LAND: Wet-Weather Source Control

Program that will include the promotion of LID and other structural and nonstructural controls to reduce CSO volume through evaporation, transpiration, infiltration, and detained release to the combined system for treatment. The permittee shall require post-construction stormwater controls on land development and redevelopment in the combined sewer area to achieve CSO reductions. As part of the CSO control program and in a manner consistent with the recommendations of the integrated Watershed Management Plans (discussed below), the permittee shall implement the following:

Ordinance and Regulations Modifications - The permittee shall continue to review and revise stormwater management regulations to require development and redevelopment projects to provide post construction stormwater controls. The PWD will issue and enforce the newly adopted stormwater management regulations and guidance in the csa areas of the city for the control of the rate and volume of stormwater runoff from new (greenfield) sites, as well as sites scheduled for redevelopment. The permittee shall conduct workshops for the development community, review agencies, and engineering/architecture firms to transfer technology on low impact development and redevelopment practices and their effectiveness in reducing CSO impacts.

Implementation of Stormwater BMPs and LID - The permittee shall continue to implement best management and LID demonstration projects by:

- Promoting high profile low impact development projects to increase citizen awareness of LID benefits.
- Promoting and supporting tree planting programs to reduce runoff volume and reduce heat-island effects through increased carbon sequestration.

Reforestation - The permittee shall work with other organizations to implement reforestation demonstration projects to provide additional tree canopy on streets and as part of development projects and through tree credits in the new storm water management regulations. The permittee is also a partner in the DCNR Tree Vitalize Program and is working with Fairmount Park on prioritizing riparian buffer restoration and street tree Planting.

II. WATER: Ecosystem Restoration and Aesthetics

The permittee shall implement projects that will contribute to the improvement of the aesthetic and ecological integrity of CSO receiving waters. In a manner consistent with the watershed management plans, the permittee shall initiate programs and projects to directly rehabilitate aquatic habitat and monitor improvements that result as part of the monitoring requirements in Section IV of this permit. The permittee shall implement the following programs to directly restore the aquatic habitat:

Riparian Buffer Creation and Enhancement - Through Its Environment, Stewardship and Education Division (ES&ED), formerly the Natural Lands Restoration and Environmental Education Program, the permittee shall continue programs for the restoration and protection of the natural lands that buffer each of the area waterways to reduce pollution, prevent erosion of the banks, provide wildlife food and cover, and shade the adjacent water, moderating temperatures for aquatic species.

III. Other Watershed Projects:

The permittee's integrated and adaptive approach has the added benefit of meeting other stakeholder water resources needs more universally and in parallel with CSO reductions, and shall include the following programs:

River Conservation Plan - The permittee shall continue to work in partnership with local partners to complete and implement River Conservation Plans (RCPs).

Watershed Information Center - The permittee shall create a website to serve as a Watershed Information and Technology Center. The center will centrally locate technical, management and administrative tools and capabilities to support watershed planning and to provide consistency, technical validity and efficiency in application of complex tools and databases in various watershed programs. The center is also to be used to post the status of the ongoing watershed planning and project implementation.

Integrated Water Use Status Networks - The permittee shall pilot a communication and water quality monitoring network that supports the identification and analysis of water quality events to support water use status decisions (swimming, triathlons, rowing, etc.) and makes this information available in real time to the public and to water suppliers. The permittee shall evaluate the technical and fiscal needs to expand the network into additional receiving waters where recreational uses are taking place.

Interpretive Signage - The permittee shall continue to implement interpretive signage as a simple, low-cost, visual way to raise awareness, connect people to their watersheds, encourage them to protect their water resources, and identify locations of significant watershed importance. The interpretive signage should include CSO locations, creek crossings, watershed boundaries, and restoration locations.

Interpretive Centers - The permittee shall continue to support existing educational interpretive centers to educate citizens about their community and the water environment. In particular these centers explore the urban watershed and its impact on area waterways environment now and in the future. The DEP recognizes the establishment of the Fairmount Water Works Interpretive Center (FWWIC) and Environmental Education Centers in the Fairmount Park System as important examples of this educational mechanism and encourages the permittee to continue to expand programs at these centers to educate on wet weather program restoration goals.

2005 STORMWATER PERMIT

*Summarized Goal of Permit: **Authorizes PWD to discharge stormwater and allowable non-stormwater collected within its incorporated boundaries, from its municipal separate storm sewer system (MS4), to surface waters of the Commonwealth of Pennsylvania, subject to the terms and conditions that follow.***

Also, note that the permit is currently expired, but that PWD is still regulated under the permit through an extension. This permit (along with the NPDES Permit) is under negotiation.

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER QUALITY MANAGEMENT
AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PERMIT
FOR DISCHARGES OF STORM WATER FROM**

PART 1 Section F, Subsection 2

F.Storm Water Management Program

The City shall maintain a Storm Water Management Program in accordance with 40 C.F.R. 122.26(d)(2)(iv) which is acceptable to the Department. Details of the Storm Water Management Program, including results and recommendations, shall be included in the Annual Report.

The major parts of the Storm Water Management Plan shall be as follows:

Step 2 - Watershed Plan Development: Permit issuance through end of year 4.

The City shall develop and implement a watershed-based assessment and management program for the Pennypack, Poquessing, and Wissahickon Creek watersheds. In meeting this goal, the City shall collect information that currently exists on the nature and causes of water quality impairments and sources of pollution and develop and update monitoring plans to characterize the present state of the physical, chemical, and biological quality of each watershed. Based upon this preliminary assessment, the City shall develop a watershed-based monitoring approach suitable for supporting the evaluation of appropriate remedial measures as outlined in the watershed planning approach below.

The City shall conduct alternative analyses such that feasible and effective strategies, plans, and designs can be developed to implement restoration strategies that mitigate the impacts of discharges from municipal separate storm sewer systems in each watershed.

The watershed and discharge monitoring, management, and characterization program to be developed and implemented for each watershed shall include three major components that are outlined below.

i. Public involvement

The City shall schedule stakeholder meetings to define watershed planning requirements, identify candidates to lead and/or convene the stakeholder groups, and schedule further activities.

3. DETECTION, INVESTIGATION, AND ABATEMENT OF ILLICIT CONNECTIONS AND IMPROPER DISPOSAL

The City shall maintain a program to detect and impose appropriate abatement requirements for illicit discharges and improper disposal to the municipal separate storm sewer system. The program shall include the following elements:

b. Investigation of Illicit Discharge Sources

- The City shall continue to maintain a system to use analytical data and observations to rank the MS4 outfalls according to their priority for corrective actions. The outfalls will be ranked according to factors that are identified with the presence of illicit discharges in the sewer shed, and according to the potential for the site to be a health risk or a nuisance to the community. Ongoing water sampling and observations at the outfalls shall be used to update the priorities list periodically. **The City shall promote the public reporting of water pollution in City streams, and shall use the information from such public complaints to update the effort to rank the priority of MS4 outfalls for corrective action.**

Notwithstanding the need to periodically update the priorities list discussed above, the sewersheds which have been previously identified as priorities, and where a substantial amount of investigation and abatement has been done, should be carried through the entire process through closure, instead of being re-ranked when the contamination levels show a reduction.

PART 1 Section F, Subsection 7

7. MISCELLANEOUS PROGRAMS AND ACTIVITIES

b. Public Education and Awareness

- i. The City shall emphasize its legal responsibilities to comply with the CWA and Clean Streams Law in its public education literature. The City shall educate the public regarding the impacts of storm water in the receiving streams and aquatic life.

8. BEST MANAGEMENT PRACTICES (BMPs)

As a minimum, the City shall implement the BMPs outlined in this permit. This list is subject to change following review of the Annual Report by the Department and discussion with the City regarding the effectiveness of the BMPs, and subject to formal modification by permit amendment.

d. The City shall operate and maintain public roadways using the following BMPs to reduce the impact on receiving waters of discharges from the municipal separate storm sewer system:

ii. Street and Inlet Cleaning Practices

- The City will promote, develop, and implement programs to increase public awareness of the importance of keeping streets and inlets free from litter and hazardous materials

e. Animal Waste and Code Enforcement

- The City will distribute educational material regarding control of animal waste and regulate animal waste disposal, including the enforcement of cleanup of pet waste, leash laws, and inspection of livestock and rendering facilities with emphasis on manure and waste processing. The quantity of materials and methods of distribution shall be reported in the annual report.

i. Public Reporting of Illicit Discharges, Improper Disposal

- The City shall promote, publicize, and facilitate public reporting of the presence of illicit discharges or water quality impacts associated with discharges from municipal separate storm sewer systems through the use of hotline numbers for illicit connections and improper disposal, and public education programs.

j. Used Oil and Toxic Material Disposal

- The City shall facilitate the proper disposal of used oil and toxic materials through the distribution of educational material and information from the City's Recycling Office on at least a quarterly basis. Public announcements, educational brochures, recycling stations, and hotline numbers will be available.

k. Storm Water Inlet Labeling/Stenciling

- The City shall continue to label/mark stormwater inlets with an identification that clearly states that it is for storm water only and a warning that dumping down the inlet is strictly prohibited.

PART 1 Section i, Subsection 2

I. ANNUAL REPORT

The City shall submit an Annual Report as required under 40 C.F.R. 122.42(c) which will document progress and facilitate long-term assessment of the City's storm water program. The Annual Report shall be submitted to the Department by the anniversary date of permit issuance for each year of the permit term.

e. A summary describing the number and nature of enforcement actions, inspections, and public education programs (including quantity of materials distributed).