

# **DAUPHIN COUNTY**

## **NPDES PHASE II REGULATIONS FOR SMALL MS4S**

### **IMPLEMENTATION PLAN**

**SEPTEMBER 1 2017  
TO AUGUST 31 2018**

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# **BACKGROUND**

Dauphin County is a regulated entity under the National Pollutant Discharge Elimination System (NPDES) program for small Municipal Separate Storm Sewer Systems (MS4). As such, Dauphin County must comply with MS4 permit conditions. These conditions specify requirements for each of six Minimum Control Measures (MCMs).

## **UNIQUE CONDITIONS**

Dauphin County, as a county level government, faces certain unique conditions in addressing the permit requirements.

1. The ability of the county to adopt required ordinances is somewhat limited due to the nature of Pennsylvania's government structure. This structure places the primary authority for ordinance adoption in the hands of local governments. That is, while the county could adopt certain ordinances, these ordinances would be superseded by a similar local ordinance. For example, the county does have a subdivision and land development ordinance, but this ordinance is superseded in any municipality which adopts a local subdivision and land development ordinance. The ordinance requirements under the MS4 program are:

1. Illicit discharge (MCM 3)
2. Erosion and sediment control (MCM 4)
3. Post construction stormwater management (MCM 5)

The county has adopted an illicit discharge ordinance, applicable to county owned or operated facilities. Ordinances addressing erosion and sediment control and post construction stormwater management have been adopted by all local governments where county owned regulated facilities are located.

2. Most regulated county facilities are of limited access. The county prison, Schaffner Youth Center, adult probation facility, bulk storage building, recycling center and three District Justice offices have limited public access. Only Fort Hunter parks has significant public use.

3. All regulated county storm sewer systems are relatively small systems as compared to larger municipal systems which may serve large developments or large urbanized areas.

4. Some facilities have onsite maintenance staff, some do not. All facilities have office staff. Staff hours are not homogenous.

5. The Dauphin County Commissioners have designated the Conservation District as the agency responsible for ensuring permit compliance. The District implements the Chapter 102 Erosion and Sediment Control and NPDES Construction Permitting program in Dauphin County.

The above conditions will help to shape the manner in which the county addresses permit requirements. These have been considered in the following plan for Dauphin County.

In addition to these programs, the District has also been active in outreach programs related to stormwater management. As many of these outreach programs are county wide programs, they are also conducted on behalf of municipalities subject to MS4 requirements.

# **REGULATED FACILITIES**

Within the Harrisburg Urbanized Area, Dauphin County owns or operates several facilities that are subject to NPDES MS4 permit requirements. Following the list below is a description of each facility. The description contains information regarding the facility that relates to the development of the Dauphin County Plan to address each of the MCMs at each facility.

1. Adult Probation Facility
2. Bulk Storage Building
3. District Justice Office – Bretz Drive
4. District Justice Office – Paxton Church Road
5. District Justice Office – Rolleston Street Street
6. District justice Office – Twenty ninth street
7. Drug and Alcohol Building
8. Fort Hunter Park
9. Prison and Judicial Center
10. Recycling Center
11. Schaffner Youth Facility
12. Wildwood Lake Park

## **ADULT PROBATION FACILITY**

The Adult Probation Facility located in Swatara Township on Gibson Boulevard, east of 19<sup>th</sup> Street and is adjacent to the Schaffner Youth Facility. The facility has three outfalls which discharge to Pelton Run, a tributary to Spring Creek. There are several inlets contributing stormwater to these outfalls. The storm sewer systems have been mapped. This facility has undergone recent renovations.

This facility is also similar to the prison, with the exception that is devoted to individuals on parole or in the work release program. Similar to the prison, the nature of the facility is such that it is not open to the general public. For obvious security reasons, access to the center is carefully controlled. The prison has an onsite maintenance staff. Office staff do not have regular hours.

## **BULK STORAGE BUILDING**

This building is located in Swatara Township on Route 441 just south of Paxton Street. Several storm sewer inlets discharge to a detention basin which in turn discharges to a storm sewer system owned by the Commonwealth of Pennsylvania through the Department of Transportation. The system then discharges to Spring Creek. The storm sewer systems have been mapped. This building houses the warehouse and coroners office. The site is maintained by offsite maintenance staff. Office staff have regular hours.

## **DISTRICT JUSTICE OFFICE – BRETZ DRIVE**

This site is located in West Hanover Township on Bretz Drive just south of Rout 22. Several inlets discharge to an offsite regional infiltration basin. The Basin ultimately discharges to Manada Creek. This is a new facility for the MS4 program. The storm sewer system has been mapped. Maintenance of this site is performed by offsite maintenance staff. The office staff has regular hours.

## **DISTRICT JUSTICE OFFICE – PAXTON CHURCH ROAD**

This building is located on Paxton Church Road west of Paxtang Avenue in Susquehanna Township. Seven storm sewer inlets are located on this property. Six of these discharge through one outfall to an unnamed tributary to Paxton Creek. The seventh is an inlet to the UNT to Paxton Creek. The storm sewer system has been mapped. The site is maintained by offsite maintenance staff. Office staff have regular hours.

## **DISTRICT JUSTICE OFFICE – ROLLESTON STREET**

This building is located on Rolleston Street south of Paxton Street in the City of Harrisburg. Four inlets discharge to the Harrisburg City storm sewer system which in turn discharges to Spring Creek. The storm sewer system has been mapped. The site is maintained by offsite maintenance staff. Office staff have regular hours.

## **DISTRICT JUSTICE OFFICE – TWENTY NINTH STREET**

This building is located on South 29th Street north of Derry Street. Two small drains discharge to the Harrisburg storm sewer system which in turn discharges to Spring Creek. The storm sewer system has been mapped. The site is maintained by offsite maintenance staff. Office staff have regular hours.

## **DRUG AND ALCOHOL BUILDING**

This Building is located on Cameron Street in the City of Harrisburg. There are two inlets in the rear of the building, each of which discharge directly to Paxton Creek. This is a new facility for the MS4 program. There are three entities located in the building, only one of which is a county office. Office staff have regular hours but logistics makes training meetings impractical. The site is maintained by offsite maintenance staff. The two outfalls for this site are difficult to access.

## **FORT HUNTER PARK**

Fort Hunter Park is located in Susquehanna Township, on Front Street, Just south of Route 443. The Park has two outfalls to the Susquehanna River and one to Fishing Creek. There are two inlets in each of the systems discharging to the river. The inlets drain small parking areas and surrounding lawns. There are no inlets associated with the system discharging to Fishing Creek. Runoff flows overland to two infiltration ponds that then discharge to Fishing Creek. Two floor drains are located in one of the maintenance buildings and one drain is located in front of the building. These discharge to an unknown location in an abandoned canal section. The storm sewer system has been mapped. The park is open to the general public. The park has an onsite maintenance staff. Office staff have regular hours.

The park has had improvements completed in January 2017. Improvements included the second storm sewer system discharging to the river and the system discharging to Fishing Creek. Also include were several infiltration areas.

## **PRISON AND JUDICIAL CENTER**

The Dauphin County Prison and Judicial Center are located in Swatara Township between Paxton Street and Route 441, adjacent to the Harrisburg Mall. For MS4 permit purposes, the facilities are treated as one facility. The facility has four separate stormwater outfalls, each with varying numbers of contributing inlets. The facility receives no offsite stormwater through storm sewer system connections. All stormwater outfalls discharge to Spring Creek. The storm sewer systems have been mapped.

The facility is not open to the general public. That is, it is not similar to a park which is accessible by virtually any one at any time. For obvious security reasons, access to the prison is carefully controlled. The prison has an on site maintenance staff. Office staff do not have regular hours. The Judicial center has a separate office staff.

## **RECYCLING CENTER**

This building is located on South 19th Street just east of Cameron Street. One inlet discharges to a swale which discharges to Spring Creek. A second inlet discharges to an outfall adjacent to Spring Creek. Dauphin County leases only the portion of this site containing two inlets. The inlets discharge off site. Recyclable materials are collected here. The site is maintained by offsite maintenance staff. Office staff have regular hours.

### **SCHAFFNER YOUTH FACILITY**

The Schaffner Youth Facility is located in Swatara Township on Gibson Boulevard, east of 19<sup>th</sup> Street. The facility has one outfall which discharges to Pelton Run, a tributary to Spring Creek. There are several inlets contributing stormwater to this outfall. The storm sewer system has been mapped. There are two entities housed at this building, the Dauphin County Emergency Management Agency and a private entity.

This facility is similar to the prison, with the exception that it is devoted to detention of minors. Similar to the prison, the nature of the facility is such that it is not open to the general public. For obvious security reasons, access to the center is carefully controlled. The facility is maintained by offsite maintenance staff. Office staff do not have regular hours.

### **WILDWOOD LAKE PARK**

This park is located in the City of Harrisburg just south of Route 39. There are five inlets that drain a small stretch of driveway. These inlets discharge to a wooded area adjacent to Paxton Creek. The storm sewer system has been mapped.

# **MCM AND BMP SUMMARY**

## **MINIMUM CONTROL MEASURE REQUIREMENTS**

The MS4 permitting program requires that six Minimum Control Measures (MCMs) be addressed. Following is a description of requirements for each MCM and the BMPs to be utilized to meet each MCM. This description is taken directly from the DEP NPDES MS4 General Permit (Document 3800-PM-BCW0100d). The majority of the BMPs listed will be implemented. Substitute and supplemental BMPs are noted. Substitute BMPs are noted where the County cannot implement a given BMP. Supplemental BMPs are used to augment the programs effectiveness or to address gaps where program requirements can not be met. A specific plan for addressing each MCM follows this section. The plan includes the BMPs to be employed, a schedule of implementation and measurable goals.

### **MCM 1 – PUBLIC EDUCATION AND OUTREACH**

Requirement:

***1. Implement a public education program to distribute educational materials to the community, or conduct equivalent outreach activities about the impacts of storm water discharges on local water bodies and the steps that the public can take to reduce pollutants in storm water runoff.***

BMP 1 – Develop, implement and maintain a written Public Education Plan

BMP 2 – Develop and maintain lists of target audience groups that are present within the areas served by the permittees small MS4.

BMP 3 – Annually publish at least one issue of a newsletter, a pamphlet, a flyer or a website that includes general stormwater educational information, a description of the permittees SWMP and/or information about the permittee's stormwater management activities.

BMP 4 – Distribute stormwater educational materials and/or information two other distribution methods annually in addition to BMP 3 above.

### **MCM 2 – PUBLIC INVOLVEMENT AND PARTICIPATION**

Requirements:

***1. Comply with applicable State, Tribal, and local public notice requirements in implementing a public involvement program.***

BMP 1 – Develop, implement and maintain a written Public Involvement and Participation Plan to include:

- Opportunities for the public to participate in the development and implementation of programs
- Routine communications with environmental organizations
- Make periodic reports, plans and other appropriate documents available to the public

BMP 2 – Advertise to the public and solicit public input prior to adoption or submission of the following:

- Stormwater Management Ordinances
- Standard Operating Procedures
- Pollutant Reduction Plans

BMP 3 – Regularly solicit participation from target groups using available distribution and outreach methods, including an effort to solicit reporting of illicit discharges.

BMP 4 – Request public involvement with regularly scheduled clean up days at Wildwood Park.

### **MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION**

Requirements:

- 1. Develop and implement a program to detect and eliminate illicit discharges.***
- 2. Develop a storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls***
- 3. Through ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, Tribal, or local law) on non-storm water discharges into the MS4, and appropriate enforcement procedures and action***
- 4. Develop and implement a plan to detect and address non-storm water discharges, including illegal dumping, into the MS4***
- 5. Educate public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste***

BMP 1 – Develop and implement a written program for detection, elimination and prevention of illicit discharges including outfall screenings to detect and eliminate illicit discharges. This includes procedures for:

- Identifying priority areas
- Screening outfalls
- Identifying the source if an illicit discharge
- Eliminating the illicit discharge
- For assessing potential for illicit discharges from interaction of sanitary systems with the MS4
- Gaining access to private property for inspections or investigating illicit discharges
- Program documentation, evaluation and assessment including record keeping
- procedures for addressing information and complaints received from the public

BMP 2 – Develop and Maintain a storm sewer map including discharges and receiving waters.

BMP 3 – Update the storm sewer system map.

BMP 4 – Conduct outfall screenings and eliminate illicit discharges.

BMP 5 – Enact an ordinance prohibiting illicit discharges.

BMP 6 – Provide outreach to target audiences using the strategies from MCM 1.

### **MCM 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

Requirements:

- 1. Develop, implement and enforce a program to reduce pollutants in stormwater runoff to the MS4 on applicable construction sites.***
- 2. Implement an ordinance, with sanctions to ensure compliance, to require erosion and sediment controls.***
- 3. Require construction site operators to implement appropriate erosion and sediment control BMPs.***
- 4. Develop and implement requirements for construction site operators to control waste that may cause adverse impacts to water quality.***
- 5. Develop and implement procedures for site plan review of construction plans that consider potential water quality impacts.***
- 6. Establish procedures for the receipt and consideration of information submitted by the public.***



## **7. Have procedures for site inspection and enforcement of control measures**

BMP 1 – Develop a program for compliance with this MCM.

BMP 2 – Annually review ordinances of municipalities to determine if those ordinances meet MS4 requirements.

This is a substitute BMP for the adoption of such an ordinance. See the ordinance discussion attached to this document.

BMP 3 – Implement requirements for construction site waste control through the Chapter 102/NPDES program.

This BMP is implemented county wide for all sites, including county owned or operated sites, through the implementation of the Chapter 102/NPDES permitting program by the County Conservation District.

BMP 4 – Implement a system for receiving public inquiries, concerns and information.

This BMP is implemented county wide for all sites, including county owned or operated sites, through the implementation of the Chapter 102/NPDES permitting program by the County Conservation District.

BMP 5 – Provide outreach to target audiences using the strategies from MCM 1.

## **MCM 5 – POST CONSTRUCTION STORMWATER MANAGEMENT**

Requirements:

- 1. Develop, implement and enforce a program to address stormwater runoff from new and redevelopment projects that disturb one acre or greater.***
- 2. Develop and implement strategies which include a combination of structural and/or non-structural best management practices (BMPs)***
- 3. Ensure adequate long-term operation and maintenance of controls***
- 4. Have an ordinance or other regulatory mechanism requiring the implementation of post-construction runoff controls to the extent allowable under State, Tribal or local law***

BMP 1 – Develop a written plan for implementation of this MCM.

BMP 2 – Require implementation of BMPs to address water quality and maintain runoff conditions.

This BMP is implemented county wide for all sites, including county owned or operated sites, through the implementation of the Chapter 102/NPDES permitting program by the County Conservation District.

Additionally, it is met by local ordinances in municipalities where county facilities are located.

BMP 3 – Ensure installation of controls at county owned facilities.

This BMP is implemented county wide for all sites, including county owned or operated sites, through the implementation of the Chapter 102/NPDES permitting program by the County Conservation District.

Additionally, it is met by local ordinances in municipalities where county facilities are located.

BMP 4 – Annually review ordinances of municipalities to determine if those ordinances meet MS4 requirements.

This is a substitute BMP for the adoption of such an ordinance. See the ordinance discussion attached to this document.

BMP 5 – Implement measures to encourage Low Impact Design principles in new and existing development.

BMP 6 – Ensure long term operation and maintenance of installed BMPs.

BMP 7 – Provide outreach to target audiences using the strategies from MCM 1.

## **MCM 6 – POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL FACILITIES**

Requirements:

- 1. Develop and implement an operation and maintenance program, including employee training, with the ultimate goal of preventing or reducing pollutant runoff from municipal operations into the storm sewer system.***
- 2. Include employee training on how to incorporate pollution prevention/good housekeeping techniques into municipal operations such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance.***

BMP 1 – Identify facilities and activities generating stormwater runoff to storm sewer systems.

- Annually review/update inventory of operations and land uses that may contribute pollution to the MS4

BMP 2 – Develop and implement an operation and maintenance program for municipal operations. Review and update the program annually. Include:

- Management practices, policies and procedures to prevent discharge of pollutants to the MS4
- Maintenance activities, schedules and inspection procedures to prevent pollutants discharge to the MS4
- Controls for eliminating pollutant discharges from streets, parking lots, storages areas, etc
- Procedures for disposal of waste and other debris

BMP 3 – Develop and implement an employee training program.

- Review the program annually
- Document trainings and include in annual reports

### **MINIMUM CONTROL MEASURE DISCUSSION**

To address the six MCMs, Dauphin County will consider the unique circumstances of each facility and the county in developing an implementation plan, including:

1. Ordinance adoption by Dauphin County for MCMs 4 and 5 is not practical. Local ordinances exist that address these MCMs. County adoption of ordinances would be redundant. Also, the local ordinances supersede the county ordinance. Dauphin County will utilize SOPs for permit requirements involving ordinance adoption.
2. The Storm Sewer systems owned by Dauphin County which are subject to MS4 permit requirements are all located at facilities that do not have permanent public populations and, for the most part, limited public access.
3. Storm sewer systems at all facilities drain relatively small areas and receive little offsite runoff.
4. Dauphin County, primarily through the Conservation District, has long been active in providing outreach and assistance related to improved stormwater management. As the Conservation District is a county wide agency, many of education and outreach activities are also conducted county wide on behalf of all MS4 regulated municipalities.
5. At two facilities, there are private entities that utilize some of the building space. While these entities are not staffed by county employees, the staff at these facilities will receive some basic training information.

These factors will largely shape the implementation plan which follows. Given the nature of the facilities and the factors discussed above, specific implementation considerations, by MCM, are discussed below.

### **MCM 1 – PUBLIC EDUCATION**

Because several of the regulated county facilities are not generally public (for example, the prison, work release center and juvenile facility), the primary target group is the maintenance staff with a secondary target audience

being employees at the facility. Where facilities are more accessible to the public, the education efforts will be tailored to the characteristics of the facility.

It should be noted however that the County, through the Conservation District, has long been active in providing outreach related to stormwater management and erosion and sediment pollution control to a wide variety of audiences. These activities will continue and will be outlined in greater detail in the MCM COMPLIANCE PLAN section.

#### MCM 2 – PUBLIC PARTICIPATION

Public participation will primarily be through opportunities for the public to comment on the county MS4 program, either through the Conservation District website or at County Commissioner or Conservation District Board Meetings. Wildwood Lake Park also has an ongoing volunteer program through which members of the general public volunteer for cleanup days in the park. Cleanup days involve litter collection, vegetation control, storm sewer system maintenance and other activities. Public participation also occurs through the Erosion and Sediment Control Program complaint handling system. The county will seek opportunities to work with other entities such as environmental organizations and other municipalities to provide additional opportunities for public participation.

#### MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

Dauphin County has adopted an ordinance prohibiting illicit discharges to county owned storm sewer systems. It should also be noted that all Dauphin County regulated facilities are located in municipalities that are regulated under the MS4 program and have adopted ordinances that address illicit discharges. The IDDE program development will consider the nature of the county facilities and activities that occur at the facilities. The county illicit discharge ordinance will need to be updated to comply with new permit provisions.

#### MCM 4 – CONSTRUCTION SITE STORMWATER MANAGEMENT

All Dauphin County regulated facilities are located in municipalities that are regulated under the MS4 program and have adopted ordinances that address the issue. The County Conservation District does implement the erosion and Sediment Pollution Control and NPDES Permitting programs. In lieu of a county ordinance, the county will annually review municipal ordinances where regulated facilities are located and where ordinances are deficient, inform the municipality of its obligations under the MS4 program. Additionally, all county construction projects are subject to NPDES construction site permitting. These NPDES regulations are implemented by the Conservation District. A formal Standard Operating Procedure will be developed to comply with permit provisions for this MCM.

#### MCM 5 – POST CONSTRUCTION STORMWATER MANAGEMENT

All Dauphin County regulated facilities are located in municipalities that are regulated under the MS4 program and have adopted ordinances that address stormwater management under Act 167 planning. In lieu of a county ordinance, the county will annually review municipal ordinances where regulated facilities are located and where ordinances are deficient, inform the municipality of its obligations under the MS4 program. Additionally, all county construction projects are subject to NPDES construction site permitting. These NPDES regulations are implemented by the Conservation District. A formal Standard Operating Procedure will be developed to comply with permit provisions for this MCM.

#### MCM 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING

Some facilities have an onsite maintenance staff while some facilities are maintained by the general county maintenance staff. In addition all facilities have office and other staff. For MCM 6, on and off site maintenance staff will be primary audiences for both education and training efforts. Office staff will also receive training. Other employees will be primary audiences for educational efforts.

Additionally, three facilities (Wildwood Lake, DJ office on Bretz Drive and the Drug and Alcohol Building) are recent additions to the list of MS4 regulated county facilities. These facilities will be incorporated into the PPGH program including PPGH plans and training.

***MCM  
IMPLEMENTATION  
PLAN***

## NOTES

For each MCM below, the first table is the generalized plan containing specific and optional activities. The final table for each MCM is intended to be the specific tasks that are to be accomplished for that permit year.

The dates listed in the following table as approximate dates for accomplishing given tasks are shown as permit year months. For example, month 8 would be eight months into the permit year. When the actual permit year is determined, these will be converted to actual month names. These dates are not to be considered as “set in stone”. The primary purpose of providing approximate time frames for task completion is to distribute the work effort over the course of a full year and to ensure certain tasks are completed at appropriate times.

All records, in any format, will be maintained at the Dauphin County Conservation District offices at 1451 Peters Mountain Road, Dauphin PA, 17018. Included in these records, in either electronic or hard copy format are:

Inspection reports  
Permit Documents  
Facility Inventories

Outfall Screening Record  
Annual reports  
MCM Documentation

IDDE Records  
MCM and PPGH Plans  
BMP Inventories and Maintenance

## MCM 1 – PUBLIC EDUCATION PLAN

<b>BMP 1</b>	Develop, implement and maintain a written public education plan.		
Task A	The plan has been developed. Review plan annually and revise as needed.		
Date	July 2018		
Measurable Goal	Review of plan annually in July		
Documentation	MS4 Activity Form	Current Or Revised Plan	

<b>BMP 2</b>	Develop target audiences and review annually		
Task A	Target audiences have developed. Review annually.		
Date	July 2018		
Measurable Goal	Review of target audiences annually in July. Selection of target audiences.		
Documentation	MS4 Activity Form	Current or revised target audiences	

<b>BMP 3</b>	Annually publish one issue of a stormwater education newsletter, pamphlet or flyer		
Task A	Distribute an educational sheet annually to all county employees through the county newsletter. Outline MS4 regulatory aspects, need for pollution prevention and steps to prevent pollution.		
Date	October 2017 to December 2017		
Measurable Goal	Distribution of newsletter		
Documentation	MS4 Activity Form	Copy of Newsletter	Distribution list
Task B	Annually review, update and maintain list of published items and content		
Date	July 2018		
Measurable Goal	Review and update completed		
Documentation	MS4 Activity Form	Updated material	New material

<b>BMP 4</b>	Distribute educational materials through two other sources		
Task A	Distribution of an educational sheet on Low Impact Development to municipalities annually		
Date	June 2018 to August 2018		
Measurable Goal	1 LID education sheet mailed annually		
Documentation	MS4 Activity Form	Copy of educational sheet	Distribution list
Task B	Distribute educational poster to schools		
Date	October 2017 to December 2017		
Measurable Goal	One poster distributed annually		
Documentation	MS4 Activity Form	Documentation	
Task C	Distribute an educational sheet to developers		
Date	June 2018 to August 2018		
Measurable Goal	One sheet mailed annually		
Documentation	MS4 Activity Form	Documentation	
Task D	Maintain DCCD website with a SWM section, education materials, program descriptions, links to the DEP and EPA website, a copy of this program and annual reports.		
Date	Ongoing updates as needed.		
Measurable Goal	Review of website. Updates as needed.		
Documentation	MS4 Activity Form	Website pages	
Task E	Place a newspaper educational ad.		
Date	October 2017 to December 2017		
Measurable Goal	Placement of ad		
Documentation	MS4 Activity Form	Copy of ad	
Task O - OPTIONAL	BMP Tours, Workshops, Presentations, Publications and Other		
Date	Ongoing. No specific date.		
Measurable Goal	As appropriate		
Documentation	MS4 Activity Form	Other As Appropriate	

## 1. TARGET AUDIENCES

Primary Target Audiences: Maintenance Staff, Office Staff, Development Community (Developers, Contractors, Consultants)

Secondary Target Audiences: Municipalities, Schools, Fort Hunter and Wildwood Lake Park Visitors, General Public, Other

- Electronic lists are maintained for developers, contractors and consultants, municipalities, and schools.

## 2. OUTREACH CHANNELS

The list below contains possible outreach channels and methods that may be used in any given year.

PARKS AND RECREATION DEPARTMENT	- Park newsletters - Counter Materials
CONSERVATION DISTRICT	- Counter Materials - Newsletters, Educational sheets
COUNTY GOVERNMENT	- County Website - Press Releases - County newsletters
WATERSHED ORGANIZATIONS	- Newsletters, cooperative projects
MUNICIPALITIES/AUTHORITIES	- Cooperative projects - Newsletters - Websites - Municipal Mailings
PUBLICATIONS	- Local Papers (Harrisburg Patriot News, Middletown Press And Journal, Hummelstown Sun) - Home Builders Association Of Greater Harrisburg Area - Professional publications (Attorneys, Realtors, etc.)
OTHER	- Workshops for developers, designers, municipalities, contractors and the general public. - Utilized the Conservation District table top educational display. - Utilize direct mailings of educational materials to target groups. - Coordinate with ESPC workshops to present educational information. - Publish stormwater related articles in applicable publications or dedicated publications. - Included information in mailings to Friends of Fort Hunter and Friends of Wildwood Lake. - Place pamphlets, posters, displays or other educational materials at county facilities.

The table below outlines specific methods that may be used for target audiences shown. Other methods will be employed as opportunities arise.

TARGET AUDIENCE	PRIORITY	PRIMARY EDUCATION EFFORT(S)
Office Staff	Primary	Conduct general stormwater education through meetings and mailings
Maintenance Staff	Primary	Conduct training for MS4 compliance and general education through meetings
Contractors	Primary	Workshops
		Targeted mailings
Developers	Primary	Public presentations
		Workshops
		Targeted mailings
Consultants	Primary	Workshops, email and Individual Contact
Park Visitors	Secondary	Counter top educational materials
Public	Secondary	Website
		Use table top education display and handouts
		Place newspaper ad
		Conduct BMP tours or workshops
Schools	Secondary	Distribute education poster
Municipalities	Secondary	Educational mailings
		Workshops

The Conservation District maintains contact lists for county staff, municipalities, developers, contractors, consultants and schools. These lists are periodically reviewed and updated. All lists are maintained in separate data bases with contact information readily extracted for mailings. The Consultant database also includes a point of contact email address for dissemination of important regulatory or other updates and communications.

**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE - SEPTEMBER 1 2016 THROUGH AUGUST 31 2017**

**MINIMUM CONTROL MEASURE 1 – PUBLIC EDUCATION**

<b>BMP</b>		<b>TASK</b>	<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. DEVELOP AND MAINTAIN A WRITTEN PUBLIC EDUCATION PLAN	A	REVIEW AND UPDATE PLAN AS NEEDED	COPY OF PLAN	JULY 2018
	A	REVIEW AND REVISE TARGET AUDIENCE LIST AND CONTACT DATA BASES. DEVELOP LIST FOR ORGANIZATIONS.	REVISED LISTS	JULY 2018
3. PUBLISH ONE ISSUE OF A STORMWATER EDUCATION NEWSLETTER, PAMPHLET OR FLYER	A	DEVELOP AND DISTRIBUTE EMPLOYEE EDUCATION SHEET	EDUCATION SHEET DISTRIBUTION LIST	OCTOBER 2017 TO DECEMBER 2017
	B	ANNUALLY REVIEW, UPDATE AND MAINTAIN LIST OF PUBLISHED ITEMS AND CONTENT	REVISED LISTS AND MATERIALS	OCTOBER 2017 TO DECEMBER 2017
4. DISTRIBUTE EDUCATIONAL MATERIALS THROUGH AT LEAST 2 OTHER SOURCES	A	DISTRIBUTE AN EDUCATIONAL SHEET TO MUNICIPALITIES	EDUCATIONAL SHEET DISTRIBUTION LIST	JUNE 2018 TO JULY 2018
	B	DISTRIBUTE AN EDUCATIONAL POSTER TO SCHOOLS	POSTER DISTRIBUTION LIST	OCTOBER 2017 TO DECEMBER 2017
	C	DISTRIBUTE AN EDUCATIONAL SHEET TO DEVELOPERS	EDUCATIONAL SHEET DISTRIBUTION LIST	JUNE 2018 TO JULY 2018
	D	REVIEW AND MAINTAIN WEBSITE	WEBSITE SCREEN SHOTS	ONGOING
	E	PLACE A NEWSPAPER EDUCATIONAL AD	COPY OF AD	OCTOBER 2017 TO DECEMBER 2017
	O			



## MCM 2 – PUBLIC INVOLVEMENT AND PARTICIPATION PLAN

<b>BMP 1</b>	Develop and implement a Public Involvement Plan		
Task A	The plan has been developed. Review plan annually.		
Date	July 2018		
Measurable Goal	Review of plan		
Documentation	MS4 Activity Form	Revised Plan	
Task B	Post plan to DCCD website and have available at DCCD offices for public review, comment and input		
Date	Ongoing		
Measurable Goal	Posting of plan		
Documentation	MS4 Activity Form	Website pages	Current or revised plan
Task C	Maintain relationships with environmental organizations through an annual newsletter		
Date	July 2018 TO August 2018		
Measurable Goal	Distribution of newsletter		
Documentation	MS4 Activity Form	Newsletter	Distribution List
Task D	Post Annual Report to DCCD website and have available at DCCD offices for public review and comment		
Date	September 2018 to October 2018		
Measurable Goal	Posting of plan		
Documentation	MS4 Activity Form	Screen shots	Comments and responses

<b>BMP 2</b>	Prior to adoption of required ordinances, provide public notice and opportunity for review and input		
Task A	Provide legally required public notices		
Date	When needed		
Measurable Goal	Legal notice given to public		
Documentation	MS4 Activity Form	Public Notice	Meeting Agenda
	Meeting minutes	Copy of comments and response	Copy of Ordinance

<b>BMP 3</b>	Regularly solicit input from the public		
Task A	Annually discuss program at County Commissioners meeting.		
Date	July 2018 to August 2018		
Measurable Goal	Attendance at meeting		
Documentation	MS4 Activity Form	Documentation	MS4 Activity Form
	Attendance sheet		Attendance sheet
Task B	Annually discuss program at DCCD Board meetings.		
Date	July 2018 to August 2018		
Measurable Goal	Attendance at meeting		
Documentation	MS4 Activity Form	Documentation	MS4 Activity Form
	Attendance sheet		Attendance sheet
Task C	Receive information from public regarding illicit discharges and erosion issues		
Date	Ongoing		
Measurable Goal	Receipt and processing of information		
Documentation	MS4 Activity Form	Documentation	
Task D	Document and report cooperative and coordinated events		
Date	Ongoing		
Measurable Goal	Number of events and participants		
Documentation	MS4 Activity Form	Event Advertisement	Attendance Sheet
			Other as appropriate
Task E	Document and report public participation in events		
Date	Ongoing		
Measurable Goal	Number of events and participants		
Documentation	MS4 Activity Form	Documentation	MS4 Activity Form
			Documentation

<b>BMP 4</b>	Request public participation in Wildwood Park clean up events		
Task A	Schedule events and solicit public participation		
Date	Monthly - March through November		
Measurable Goal	Attendance at events		
Documentation	MS4 Activity Form	Public Notice	Attendance sheet

## 1. ENVIRONMENTAL ORGANIZATIONS

The primary identified environmental organizations that operate in the area of regulated county facilities are listed below. Dauphin County will also seek opportunities to work with organizations as projects are available, including organizations not within county MS4 watersheds.

ORGANIZATION	WATERSHED
Paxton Creek Watershed and Education Association	Paxton Creek
Doc Fritchey Chapter of Trout Unlimited	Spring Creek (West)
West Hanover Township Environmental Advisory Council (EAC)	Fishing Creek, Beaver Creek, Manada Creek
Derry Township Environmental Action Committee	Swatara Creek, Spring Creek (East)

## 2. PUBLIC NOTICE AND INPUT FOR ORDINANCE ADOPTION

Dauphin County has previously adopted an Illicit Discharge ordinance but will need to update its Illicit Discharge ordinance by September 30, 2022. Appropriate public notice and opportunity for public comment will be necessary.

## 3. SCHEDULE

The schedule of activities is included in the BMP tables. In general, plan reviews and posting the DCCD website will occur annually. The plan review will be conducted near the end of the permit year (currently August 31) to revise the plan, if needed, for the coming year.

Annual reports and plans will be posted to the DCCD website immediately when completed. This will normally be early in the permit year.

Public meetings (DCCD Board and County Commissioners) will occur near the end of the permit year (currently August 31) to summarize the previous year's activities and activities anticipated for the coming year.

Wildwood Park volunteer cleanup days are scheduled monthly (March through November).

Other activities, not specified in the plan, may arise. These activities will be pursued on a case by case basis.

**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE - SEPTEMBER 1 2016 THROUGH AUGUST 31 2017**

**MINIMUM CONTROL MEASURE 2 – PUBLIC PARTICIPATION**

<b>BMP</b>	<b>TASK</b>		<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. DEVELOP AND IMPLEMENT A WRITTEN PUBLIC INVOLVEMENT PLAN	A	REVIEW AND UPDATE PLAN AS NEEDED	COPY OF PLAN	JULY 2018
	B	PROVIDE OPPORTUNITY FOR PUBLIC INVOLVEMENT WITH PLAN DEVELOPMENT AND IMPLEMENTATION.	WEBSITE SCREEN SHOTS SUMMARY OF COMMENTS	ONGOING
	C	ROUTINE COMMUNICATION WITH ENVIRONMENTAL ORGANIZATIONS	COPY OF NEWSLETTER	JULY 2018 TO AUGUST 2018
	D	MAKE PERIODIC REPORTS AVAILABLE TO THE PUBLIC	WEBSITE SCREEN SHOTS SUMMARY OF COMMENTS	SEPTEMBER 2018 TO OCTOBER 2018
2. PRIOR TO ADOPTION OF REQUIRED ORDINANCES, PROVIDE PUBLIC NOTICE AND OPPORTUNITY FOR REVIEW AND INPUT	A	ADVERTISE ADOPTION OF ORDINANCE AS PER LEGAL REQUIREMENTS	COPY OF ORDINANCE PUBLIC NOTICE MEETING AGENDA ATTENDANCE SHEET MINUTES	BEFORE ADOPTION OF ANY ORDINANCE
	B	SOLICIT PUBLIC INPUT	COPY OF SOLICITATION COPY OF COMMENTS	BEFORE ADOPTION OF ANY ORDINANCE
3. REGULARLY SOLICIT INPUT FROM THE PUBLIC AND DISCUSS IMPLEMENTATION OF THE PLAN AT SCHEDULED PUBLIC MEETING.	A	COORDINATE WITH COMMISSIONERS MEETING ANNUALLY AND ADVERTISE MS4 CONTENT OF MEETING.	ATTENDANCE SHEETS MEETING MINUTES PUBLIC AD	JULY 2018 TO AUGUST 2018
	B	COORDINATE WITH CONSERVATION DISTRICT MEETING ANNUALLY AND ADVERTISE MS4 CONTENT OF MEETING.	ATTENDANCE SHEETS MEETING MINUTES PUBLIC AD	JULY 2018 TO AUGUST 2018
	C	RECEIVE AND ADDRESS PUBLIC INFORMATION REGARDING ILLICIT DISCHARGES AND EROSION ISSUES	SUMMARY OF COMPLAINTS	ONGOING
	D	DOCUMENT AND REPORT COOPERATIVE AND COORDINATED EVENTS	EVENT ADVERTISEMENT ATTENDANCE SHEET	ONGOING
	E	DOCUMENT AND REPORT PUBLIC PARTICIPATION IN EVENTS	EVENT ADVERTISEMENT ATTENDANCE SHEET	ONGOING
4. PUBLIC PARTICIPATION IN WILDWOOD PARK CLEAN UP EVENTS	A	SCHEDULE EVENTS AND REQUEST PUBLIC PARTICIPATION	EVENT ADVERTISEMENT ATTENDANCE SHEET	MONTHLY MARCH-NOVEMBER

**MCM 3 – ILLICIT DISCHARGE  
DETECTION AND ELIMINATION PLAN**

<b>BMP 1</b>	Develop a written IDDE plan including various procedures		
Task A	The plan has been developed. Review plan annually.		
Date	July 2018		
Measurable Goal	Review of plan		
Documentation	MS4 Activity Form	Revised Plan	

<b>BMP 2</b>	Develop and maintain storm sewer maps with outfalls and receiving waters		
Task A	The maps have been developed. Review maps annually.		
Date	Ongoing		
Measurable Goal	Maintenance and update of maps		
Documentation	MS4 Activity Form	System Maps	

<b>BMP 3</b>	Update system maps		
Task A	Update maps as needed		
Date	Ongoing		
Measurable Goal	Maps updated as needed		
Documentation	MS4 Activity Form	Revised Maps	

<b>BMP 4</b>	Outfall screening		
Task A	Screen each outfall at least one by March 15, 2023		
Date	See Appendix B		
Measurable Goal	Screening of scheduled outfalls		
Documentation	MS4 Activity Form	Screening form	Photos
	All documents related to illicit discharge resolution as applicable		
Task B	Implement procedures for noting observations and for sampling and analysis if needed		
Date	As Needed		
Measurable Goal	Documented observations and sample collection and analysis		
Documentation	MS4 Activity Form	Remediation Report	Other as Required
Task C	Ensure proper maintenance of outfalls		
Date	November 2017 and May 2018 in conjunction with inspections		
Measurable Goal	Repair conducted on outfalls as needed		
Documentation	MS4 Activity Form	Documentation of Repair	

<b>BMP 5</b>	Enact an ordinance prohibiting illicit discharges		
Task A	Review ordinances where regulated county facilities are located for compliance with MS4 requirements. If ordinances are not in place, advise municipality of its MS4 responsibilities.		
Date	April 2018 to May 2018		
Measurable Goal	Review of municipal ordinances		
Documentation	MS4 Activity Form	Ordinance summary	Copy of letter if applicable

<b>BMP 6</b>	Inform target audiences of hazards of illicit discharges		
Task A	Annual distribution through the county payroll system of an education sheet		
Date	October 2017 to December 2017		
Measurable Goal	Distribution of sheet		
Documentation	MS4 Activity Form	Education Sheet	Distribution list
Task B	Incorporation of an illicit discharge education element into the annual staff training		
Date	October 2017 to December 2017		
Measurable Goal	Development of training modules and annual staff trainings completed annually		
Documentation	MS4 Activity Form	Materials	
Task C	Place an education newspaper add annually		
Date	October 2017 to December 2017		
Measurable Goal	Placement of add		
Documentation	MS4 Activity Form	Copy of add	
Task D	Distribute an education posters to schools annually		
Date	October 2017 to December 2017		
Measurable Goal	Distribution of posters		
Documentation	MS4 Activity Form	Poster	Distribution list
Task E	Add and review annually illicit discharge information to DCCD and County websites		
Date	October 2017 to December 2017		
Measurable Goal	Information is posted to website		
Documentation	MS4 Activity Form	Screen shot	
Task F	Establish and promote a stormwater pollution reporting mechanism		
Date	October 2017 to December 2017		
Measurable Goal	Developed system and implementation of the system		
Documentation	MS4 Activity Form	System Plan	

**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE - SEPTEMBER 1 2016 THROUGH AUGUST 31 2017**

**MINIMUM CONTROL MEASURE 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION**

<b>BMP</b>		<b>TASK</b>	<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. DEVELOP A WRITTEN IDDE PLAN	A	REVIEW AND REVISE EXISTING PLAN	COPY OF PLAN	JULY 2018
2. DEVELOP AND MAINTAIN STORM SEWER MAP	A	DEVELOP A STORM SEWER SYSTEM MAP	COPIES OF MAPS	ONGOING
3. UPDATE STORM SEWER SYSTEM MAPS	A	REVIEW AND UPDATE MAP AS NEEDED	UPDATED MAPS	ONGOING
4. SCREEN OUTFALLS, IDENTIFY AND CORRECT ILLICIT DISCHARGES	A	CONDUCT SCREENINGS AS PER APPENDIX B	SCREENING FORMS AND PHOTOS	SEPTEMBER 2017 TO NOVEMBER 2017
	B	OBSERVATIONS AND ANALYSIS OF DISCHARGES. IDENTIFY AND ELIMINATE ILLICIT DISCHARGES	ILLICIT DISCHARGE FORM REMEDIATION DOCUMENTATION	AS NEEDED
	C	ENSURE PROPER MAINTENANCE OF OUTFALLS	INSPECTION REPORTS REMEDIATION DOCUMENTS	AS NEEDED
5. ENACT ORDINANCE PROHIBITING ILLICIT DISCHARGES	A	VERIFY ORDINANCES IN MUNICIPALITIES WHERE REGULATED COUNTY FACILITIES ARE LOCATED. IF ORDINANCES NOT ADOPTED NOTIFY MUNICIPALITY OF RESPONSIBILITIES	ORDINANCE SUMMARY COMMENTS NOTICE LETTER IF NEEDED	JUNE 1 2017 TO AUGUST 31 2017
6. INFORM TARGET AUDIENCES OF HAZARDS OF ILLICIT DISCHARGES	A	DISTRIBUTE EMPLOYEE EDUCATION SHEET	EDUCATION SHEET	MONTH 2-4
	B	INCORPORATE ILLICIT DISCHARGE ELEMENT INTO ANNUAL STAFF TRAINING	ATTENDANCE SHEETS MATERIALS	MONTH 2-4
	C	PLACE NEWSPAPER AD	COPY OF AD	MONTH 2-4
	D	DISTRIBUTE POSTER TO SCHOOLS	POSTER DISTRIBUTION LIST	MONTH 2-4
	D	INCORPORATE ID ELEMENT INTO ANNUAL STAFF TRAINING	ATTENDANCE SHEETS MATERIALS	MONTH 2-4
	E	PLACE ID INFORMATION ON WEBSITE INCLUDING WHAT AN ID IS AND HOW TO REPORT	SCREEN SHOT	MONTH 2-4
	F	ESTABLISH AND PROMOTE A STORMWATER POLLUTION REPORTING MECHANISM	PLAN	MONTH 2-4

## MCM 4 – CONSTRUCTION SITE STORMWATER MANAGEMENT PLAN

<b>BMP 1</b>	Ensure compliance with NPDES Construction Permit regulations		
Task A	Rely on DEP's NPDES Construction permitting program		
Date	Ongoing		
Measurable Goal	Compliance with Chapter 102 for county projects		
Documentation	MS4 Activity Form	All documentation needed to demonstrate compliance for county projects	

<b>BMP 2</b>	Annual review of municipal ordinances		
Task A	Dauphin County will verify ordinances have been adopted by municipalities where regulated county facilities are located. If not, Dauphin County will advise the municipality of its responsibilities.		
Date	July 2018 to August 2018		
Measurable Goal	Review of municipal ordinances		
Documentation	MS4 Activity Form	Ordinance summary	Copy of letter if applicable

<b>BMP 3</b>	Implement ordinances for construction site waste control		
Task A	Dauphin County will verify ordinances have been adopted by municipalities where regulated county facilities are located. If not, Dauphin County will advise the municipality of its responsibilities.		
Date	July 2018 to August 2018		
Measurable Goal	Implementation of Chapter 102/NPDES permitting by DCCD including county regulated facilities		
Documentation	MS4 Activity Form	Municipal summary	
	Permit documents (approved plans, authorizations, inspection forms, enforcement documents, NOT		
Task B	This requirement is incorporated into Chapter 102 regulations. Dauphin County, through the County Conservation District, administers the Chapter 102 regulations for all construction sites, including county owned sites, in Dauphin County.		
Date	Ongoing		
Measurable Goal	Review of municipal ordinances		
Documentation	MS4 Activity Form	Ordinance summary	Copy of letter if applicable
Task C	Dauphin County will review MOUs for ESPC currently on file. Municipalities without such MOUs will be encouraged to adopt such MOUs.		
Date	October 2017 to November 2017		
Measurable Goal	Review of MOU status		
Documentation	MS4 Activity Form	List of municipalities without MOUs	

<b>BMP 4</b>	Receive and consider information from the public		
Task A	Receive information from the public regarding erosion issues. Investigate complaints or forward to appropriate entity		
Date	Ongoing		
Measurable Goal	Continued receipt of information and appropriate follow up		
Documentation	MS4 Activity Form	Municipal summary	

<b>BMP 5</b>	Outreach to target audiences		
Task A	Target audiences for this BMP include municipalities, developers, contractors and consultants. Education activities may include targeted mailings, workshops and individual contacts. The primary activity is distribution of an educational sheet to developers.		
Date	June 2018 to August 2018		
Measurable Goal	Distribute an educational sheet to developers		
Documentation	MS4 Activity Form	Educational Sheet	Distribution list
	Other documentation		
Task O - OPTIONAL	BMP Tours, Workshops, Presentations, Publications		
Date	Ongoing.		
Measurable Goal	As appropriate		
Documentation	MS4 Activity Form	Other As Appropriate	

## **1. ORDINANCE REVIEW**

The annual review of municipal ordinances is a substitute BMP in lieu of county adoption of ordinances. Required ordinances are in place in municipalities where county regulated facilities are located. These ordinances supersede any ordinance the county would adopt. This approach has been authorized by EPA.

## **2. OUTREACH**

Dauphin County will also provide outreach to certain target audiences. The intent of the outreach is to provide specific audiences with up to date information on regulations and technical aspects of the Chapter 102 and NPDES permitting program. Information presented will be tailored to the specific audience.

## **3. COUNTY COMPLIANCE WITH CHAPTER 102 AND NPDES CONSTRUCTION PERMITTING**

The Dauphin County Conservation District is responsible for both the implementation of the county MS4 permit program and for the implementation of the Chapter 102 and NPDES permitting program throughout Dauphin County. As such, DCCD applies the 102 and NPDES permitting rules, regulations and procedures to county construction projects. Any county project, whether within and MS4 area or not, is subject to these regulations. Local ordinances throughout Dauphin County require adherence to these program. Dauphin County is not exempt from these ordinance nor from Chapter 102 and NPDES permitting requirements.

While DCCD does have MOUs with municipalities in Dauphin County for the administration of the Chapter 102 and NPDES permitting program, as DCCD is a county department, it is believed that an MOU between the county and itself (DCCD) is not needed.



**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE - SEPTEMBER 1 2016 THROUGH AUGUST 31 2017**

**MINIMUM CONTROL MEASURE 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL**

<b>BMP</b>	<b>TASK</b>		<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. ENSURE COMPLIANCE WITH NPDES	A	REVIEW AND REVISE EXISTING PROGRAM	COPY OF PLAN	Ongoing
2. ANNUAL REVIEW OF MUNICIPAL ORDINANCES	A	VERIFY ORDINANCES IN MUNICIPALITIES WHERE REGULATED COUNTY FACILITIES ARE LOCATED. IF ORDINANCES NOT ADOPTED NOTIFY MUNICIPALITY OF RESPONSIBILITIES	ORDINANCE SUMMARY COMMENTS NOTICE LETTER IF APPLICABLE	JUNE 2018 TO AUGUST 2018
3. REQUIRE CONSTRUCTION SITE WASTE CONTROL	A	VERIFY ORDINANCES IN MUNICIPALITIES WHERE REGULATED COUNTY FACILITIES ARE LOCATED. IF ORDINANCES NOT ADOPTED NOTIFY MUNICIPALITY OF RESPONSIBILITIES.	ORDINANCE SUMMARY COMMENTS NOTICE LETTER	JUNE 2018 TO AUGUST 2018
	B	CONTINUE IMPLEMENTATION OF CHAPTER 102 REQUIREMENTS THROUGH COUNTY CONSERVATION DISTRICT	MUNICIPAL SUMMARY APPROPRIATE PERMIT DOCUMENTS	ONGOING
	C	REVIEW MUNICIPAL MOU STATUS, ENCOURAGE MOU PARTICIPATION	MUNICIPAL LIST	OCTOBER 2017 TO DECEMBER 2017
4. RECEIVE AND CONSIDER INFORMATION FROM THE PUBLIC	A	CONTINUE IMPLEMENTATION OF CHAPTER 102 REQUIREMENTS THROUGH COUNTY CONSERVATION DISTRICT	MUNICIPAL SUMMARY	ONGOING
5. PROVIDE OUTREACH TO TARGET AUDIENCES	A	DISTRIBUTE AN EDUCATIONAL SHEET TO DEVELOPERS	COPY OF SHEET DISTRIBUTION LIST	JUNE 1 2018 TO AUGUST 31 2018
	O	CONDUCT OTHER OUTREACH EVENTS	OTHER DOCUMENTATION	ONGOING

**MCM 5 – POST CONSTRUCTION  
STORMWATER MANAGEMENT PLAN**

<b>BMP 1</b>	Develop a written plan		
Task A	The plan has been developed. Review plan annually.		
Date	July 2018		
Measurable Goal	Review of plan		
Documentation	MS4 Activity Form	Revised Plan	

<b>BMP 2</b>	Require controls to prevent or minimize water quality impacts		
Task A	Dauphin County will verify ordinances have been adopted by municipalities where regulated county facilities are located. If not, Dauphin County will advise the municipality of its responsibilities. Dauphin County will also review MOUs for Erosion and Sediment Control Program currently on file with municipalities. Municipalities without such MOUs will be encouraged to adopt such MOUs.		
Date	June 2018 to August 2018		
Measurable Goal	Review of municipal ordinances		
Documentation	MS4 Activity Form	Ordinance summary	Copy of letter if applicable
Task B	This requirement is incorporated into Chapter 102 regulations. Dauphin County, through the County Conservation District, administers the Chapter 102 regulations for all construction sites, including county owned sites, in Dauphin County.		
Date	Ongoing		
Measurable Goal	Implementation of Chapter 102/NPDES permitting by DCCD including county regulated facilities		
Documentation	MS4 Activity Form	Municipal summary	
	Permit documents (approved plans, authorizations, inspection forms, enforcement documents, NOT		
Task C	Dauphin County will review MOUs for ESPC currently on file. Municipalities without such MOUs will be encouraged to adopt such MOUs.		
Date	October 2017 – November 2017		
Measurable Goal	Review of MOU status		
Documentation	MS4 Activity Form	List of Municipalities without MOUs	

<b>BMP 3</b>	Ensure installation of controls at county owned facilities		
Task A	Ensure installation of BMPs at all county owned new or redevelopment projects. This is also a requirement of the 102/NPDES permitting program implemented countywide by the County Conservation District. By implementing the Chapter 102/NPDES permitting program, construction projects at regulated county owned facilities will be required to implement the required controls.		
Date	Ongoing		
Measurable Goal	Verification of installation BMP documentation (plans, specs, inspection and maintenance records) Incorporate BMP information into annual trainings		
Documentation	MS4 Activity Form	Permit plans, authorizations, inspection forms, enforcement documents, NOT	
Task B	Implementation of Chapter 102/NPDES permitting by DCCD including county regulated facilities		
Date	Ongoing		
Measurable Goal	NA		
Documentation	MS4 Activity Form	Municipal Summaries	
Task C	Maintain Documentation of BMPs (Plans, specs, inspection and maintenance records)		
Date	Ongoing		
Measurable Goal	Appropriate documentation in files and up to date		
Documentation	MS4 Activity Form	Other as appropriate	
Task D	Incorporate BMP information into annual training		
Date	Periodically through annual training		
Measurable Goal	Incorporate BMP information once per permit cycle		
Documentation	MS4 Activity Form	Training Materials	Attendance/Distribution Lists

<b>BMP 4</b>	Annual review of municipal ordinances		
Task A	Dauphin County will verify ordinances have been adopted by municipalities where regulated county facilities are located. If not, Dauphin County will advise the municipality of its responsibilities.		
Date	June 2018 to August 2018		
Measurable Goal	Review of municipal ordinances		
Documentation	MS4 Activity Form	Ordinance summary	Copy of letter if applicable

<b>BMP 5</b>	Encourage Low Impact Development principles		
Task A	Mail one educational sheet annually to municipal governing bodies.		
Date	June 2018 to August 2018		
Measurable Goal	Distribution of educational sheet		
Documentation	MS4 Activity Form	Educational sheet	Distribution list

<b>BMP 6</b>	Ensure operation and maintenance of BMPs at development and redevelopment sites		
Task A	BMPs installed or existing at regulated county facilities will be inspected as per the inspection schedule in MCM 6 and maintained as needed or periodically.		
Date	November 2017 and May 2018		
Measurable Goal	Inspection of all BMPs once per year and performance of maintenance as needed		
Documentation	MS4 Activity Form	Inspection reports	Maintenance record

<b>BMP 7</b>	Provide education and outreach regarding PCSM		
Task A	DCCD website will be maintained and updated at a minimum. Other opportunities as outlined in MCM 1 will be pursued.		
Date	Ongoing		
Measurable Goal	Website review in December		
Documentation	MS4 Activity Form	Web pages	Copies of materials
	Distribution lists	Other documentation	
Optional Tasks	Provide education to target audiences on technical and nontechnical aspects of post construction stormwater management.		
Date	Ongoing. No specific date.		
Measurable Goal	As appropriate		
Documentation	MS4 Activity Form	Other As Appropriate	

## 1. BMP INVENTORY

The inventory of BMPs installed after March 10, 2003 includes the following data:

- Street address
- Latitude and longitude
- Name, address and phone number for responsible entity if not Dauphin County
- Type of BMP
- The year the BMP was installed
- Maintenance requirements
- Inspection schedule
- Inspection and maintenance records
- Photos

**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE**

**MINIMUM CONTROL MEASURE 5 – POST CONSTRUCTION STORMWATER MANAGEMENT**

<b>BMP</b>	<b>TASK</b>		<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. DEVELOP WRITTEN PLAN	A	REVIEW AND REVISE EXISTING PLAN	MS4 ACTIVITY FORM COPY OF PLAN	JULY 2018
2. REQUIRE CONTROLS TO PREVENT OR MINIMIZE WATER QUALITY IMPACTS	A	VERIFY ORDINANCES IN MUNICIPALITIES WHERE REGULATED COUNTY FACILITIES ARE LOCATED. IF ORDINANCES NOT ADOPTED NOTIFY MUNICIPALITY OF RESPONSIBILITIES	MS4 ACTIVITY FORM ORDINANCE SUMMARY COMMENTS NOTICE LETTER IF APPLICABLE	JUNE 2018 TO AUGUST 2018
	B	CONTINUE IMPLEMENTATION OF THE CHAPTER 102/NPDES PERMITTING PROGRAM BY THE COUNTY CONSERVATION DISTRICT	MS4 ACTIVITY FORM MUNICIPAL SUMMARY APPROPRIATE PERMIT DOCUMENTS	ONGOING
	C	REVIEW MUNICIPAL MOU STATUS, ENCOURAGE MOU PARTICIPATION	MS4 ACTIVITY FORM MUNICIPAL LIST	OCTOBER 2017 TO NOVEMBER 2018
3. ENSURE INSTALLATION OF CONTROLS AT COUNTY OWNED FACILITIES	A	VERIFY INSTALLATION OF BMPS AT NEW OR REDEVELOPMENT PROJECTS AT COUNTY OWNED FACILITIES.	MS4 ACTIVITY FORM APPROPRIATE PERMIT DOCUMENTS	ONGOING
	B	CONTINUE IMPLEMENTATION OF THE CHAPTER 102/NPDES PERMITTING PROGRAM BY THE COUNTY CONSERVATION DISTRICT	MS4 ACTIVITY FORM MUNICIPAL SUMMARY	ONGOING
	C	MAINTAIN DOCUMENTATION OF BMPS INCLUDING PLANS, SPECIFICATIONS, AND INSPECTION AND MAINTENANCE RECORDS	MS4 ACTIVITY FORM O AND M RECORDS NPDES FILES	ONGOING
	D	INCORPORATE BMP INFORMATION INTO ANNUAL TRAININGS	MS4 ACTIVITY FORM EDUCATIONAL MATERIALS ATTENDANCE SHEETS	PERIODICALLY
4. ANNUAL REVIEW OF MUNICIPAL ORDINANCES	A	VERIFY ORDINANCES IN MUNICIPALITIES WHERE REGULATED COUNTY FACILITIES ARE LOCATED. IF ORDINANCES NOT ADOPTED NOTIFY MUNICIPALITY OF RESPONSIBILITIES	MS4 ACTIVITY FORM ORDINANCE SUMMARY COMMENTS NOTICE LETTER IF APPLICABLE	JUNE 2018 TO AUGUST 2018
5. IMPLEMENT MEASURES TO ENCOURAGE LID PRINCIPLES	A	DISTRIBUTE EDUCATIONAL SHEET TO MUNICIPALITIES	MS4 ACTIVITY FORM EDUCATIONAL SHEET DISTRIBUTION LIST	JUNE 2018 TO AUGUST 201
6. ENSURE LONG TERM OPERATION OF BMPS	A	EXISTING OR INSTALLED BMPS AT COUNTY REGULATED FACILITIES WILL BE INSPECTED AS PART OF MCM 6 ACTIVITIES.	MS4 ACTIVITY FORM BMP INSPECTION SHEETS BMP MAINTENANCE SHEETS	PER MCM 6 INSPECTION SCHEDULE
7. PROVIDE EDUCATION AND OUTREACH REGARDING PCSM	A	REVIEW AND MAINTAIN WEBSITE	MS4 ACTIVITY FORM WEBSITE SCREENS	ONGOING
	O	CONDUCT OUTREACH ACTIVITIES TO TARGET AUDIENCES	MS4 ACTIVITY FORM OTHER AS APPROPRIATE	ONGOING

**MCM 6 – POLLUTION PREVENTION  
GOOD HOUSEKEEPING PLAN**

<b>BMP 1</b>	Identify facilities generating stormwater		
Task A	Review facilities annually. Identify new facilities or activities		
Date	Ongoing		
Measurable Goal	Review of facilities completed		
Documentation	MS4 Activity Form		

<b>BMP 2</b>	Develop an Operation and Maintenance plan for each regulated facility		
Task A	The plan has been developed. Review plan annually.		
Date	August 2018		
Measurable Goal	Review of plan		
Documentation	MS4 Activity Form	Revised Plan	
Task B	Inspect all systems annually		
Date	November 2017 and May 2018		
Measurable Goal	All systems inspected in May and November		
Documentation	MS4 Activity Form	Inspection forms	Maintenance forms for BMPs
Task C	Ensure the proper disposal of waste removed from facilities including storm sewer clean out waste.		
Date	Ongoing, as needed		
Measurable Goal	No waste disposed of improperly		
Documentation	MS4 Activity form	Other Appropriate Documentation	

<b>BMP 3</b>	Develop and implement an employee training program		
Task A	Review training program annually		
Date	August 2018		
Measurable Goal	Review of plan		
Documentation	MS4 Activity Form	Revised Plan	
Task B	Develop training modules for specific audiences and subjects		
Date	Ongoing		
Measurable Goal	Development of modules		
Documentation	MS4 Activity Form	Training modules	Materials
Task C	Conduct and document annual and periodic training		
Date	Throughout year		
Measurable Goal	Training as per the training program completed each year (See Appendix A)		
Documentation	MS4 Activity Form	Attendance/Distribution sheets	Training materials

<b>BMP 4</b>	Provide outreach to target audiences using strategies from MCM 1		
Task A	Distribute employee newsletter		
Date	October 2017 to December 2017		
Measurable Goal	Distribution of newsletter		
Documentation	MS4 Activity Form	Newsletter	Distribution list

## **1. STREET SWEEPING**

An MOU has been entered into by Dauphin County and Swatara Township for street sweeping specific areas of the County prison, Schaffner Youth Center and the Adult Probation Building. The MOU specifies that waste is to be disposed of properly. Swatara Township has informed the county that the waste is currently disposed of at a township owned and DEP approved waste site. For storm sewer cleanouts performed by private entities, a certification that the waste was disposed of properly will be required.

## **2. POLLUTION PREVENTION AND GOOD HOUSEKEEPING PLANS**

Plan elements will include the following:

- Management practices and procedures and controls to minimize discharge of pollutants to storm sewer systems.
- Where facilities have floor drains, a recommendation to eliminate such drains, if practical will be incorporated into the plan
- A schedule for facility inspection
- Follow up procedures where facility inspections indicate a need for repair of maintenance
- Proper waste disposal procedures
- Operation and maintenance recommendations for BMPs

**DAUPHIN COUNTY MS4 PERMIT**

**IMPLEMENTATION SCHEDULE**

**MINIMUM CONTROL MEASURE 6 – POLLUTION PREVENTION AND GOOD HOUSEKEEPING**

<b>BMP</b>		<b>TASK</b>	<b>DOCUMENTATION</b>	<b>SCHEDULE</b>
1. IDENTIFY FACILITIES GENERATING RUNOFF	A	REVIEW FACILITIES, REVISE LIST AS NEEDED	FACILITY LIST	ONGOING
2. DEVELOP OPERATION AND MAINTENANCE PROGRAM FOR EACH FACILITY	A	REVIEW AND UPDATE EACH PLAN BY FACILITY AS NEEDED	COPY OF PLAN	JULY 2018
	B	CONDUCT STORM SEWER SYSTEM INSPECTIONS	INSPECTION REPORTS BMP MAINTENANCE REPORTS	NOVEMBER 2017 AND MAY 2018
	C	ENSURE PROPER DISPOSAL OF COLLECTED WATSES	APPROPRIATE	ONGOING
3. IMPLEMENT EMPLOYEE TRAINING PROGRAM	A	REVIEW TRAINING PROGRAM	UPDATED TRAINING ROGRAM	JULY 2018
	B	DEVELOP TRAINING MODULES	MODULE AND MATERIALS	ONGOING
	C	CONDUCT ANNUAL TRAINING EVENTS	ATTENDANCE SHEETS TRAINING MATERIALS	THROUGHOUT YEAR
4. DISTRIBUTE AN ANNUAL EDUCATION NEWSLETTER TO ALL COUNTY EMPLOYEES	A	DISTRIBUTE EMPLOYEE EDUCATION SHEET	EDUCATION MATERIALS DISTRIBUTION SHEET	OCTOBER 2017 TO DECEMBER 2017

# ***APPENDIX A***

# ***TRAINING PROGRAM***



## DAUPHIN COUNTY MS4 PROGRAM

### TRAINING PROGRAM

In addition to other permit requirements, regulated entities, such as Dauphin County, must implement a training program for municipal staff as part of a good housekeeping at municipal facilities requirement. This section outlines this training program.

The regulated county facilities all have unique characteristics that affect the development of the training program. Following is a list of the facilities currently regulated under the MS4 permit with a discussion of the aspects of the facility as they relate to development of a training program, target groups, training approaches, training objectives and training topics. Training modules will be developed for certain training topics appropriate to each site.

Training will focus on two target audiences:

1. **MAINTENANCE STAFF** – The county maintenance staff is responsible for maintaining each of the regulated facilities. Some of the regulated facilities have an onsite maintenance staff. These facilities are the county prison, Adult Probation and Fort Hunter Park. The remaining facilities, three District Justice offices, the Recycling Center, Bulk Storage building and Schaffner Youth Center, are maintained by county maintenance staff housed off site. Maintenance staff training will be provided by two methods.

- Provide information aimed at raising the awareness of the connection between runoff and stream pollution.

- Annual training meetings to provide specific information related to the site including, but not limited to:

-Regulatory requirements

-Runoff and water pollution

-Understanding and implementing the Pollution Prevention and Good Housekeeping plan for each facility

-Understanding and maintaining BMPs

-Handling spills

2. **OFFICE AND OTHER STAFF** – All facilities have office and other staff (for example, prison guards, clerical staff, program staff) housed at the facility. Training for such staff will focus on raising the awareness of the connection between runoff and stream pollution, pollution prevention in the daily routine and spill response. This training will be accomplished primarily through outreach materials and a training meeting at least once per permit term. In some cases, due to number of staff and work staff work schedules, training may be only through outreach materials. Facilities where such conditions exist are the EMA office, prison and adult probation.

Following are summaries of target groups, training objectives, modules and training methods.

TARGET GROUP TRAINING SUMMARY	
TARGET GROUP	OBJECTIVES
MAINTENANCE STAFF	UNDERSTANDING OF PERMIT PROGRAM REQUIREMENTS AWARENESS OF THE LINK BETWEEN STORMWATER RUNOFF AND WATER QUALITY UNDERSTANDING PROPER MAINTENANCE OF BMPs UNDERSTANDING THE GOOD HOUSEKEEPING PLAN UNDERSTANDING OF HOW TO REACT TO PREVENT AND REACT TO SPILLS UNDERSTANDING WHAT TO DO IN THE EVENT OF A MAJOR SPILL
OTHER STAFF INCLUDING NON COUNTY STAFF	UNDERSTANDING OF PERMIT PROGRAM REQUIREMENTS AWARENESS OF THE LINK BETWEEN STORMWATER RUNOFF AND WATER QUALITY UNDERSTANDING OF HOW TO PREVENT AND REACT TO SPILLS UNDERSTANDING WHAT TO DO IN THE EVENT OF A MAJOR SPILL

<b>TRAINING MODULE SUMMARY</b>			
<b>MODULE</b>	<b>TOPIC</b>	<b>TARGET</b>	<b>OBJECTIVE</b>
A	REGULATORY FRAMEWORK	AS	FAMILIARITY WITH REGULATIONS - WHAT WE ARE DOING AND WHY
B	IMPACT OF STORMWATER RUNOFF	AS	BASIC UNDERSTANDING OF RUNOFF AND IMPACTS
C	PPGH PLAN	MS	UNDERSTANDING THE PLAN AND - NEEDS TO BE DONE AND WHY
D	SPILLS AND SPILL KITS	AS	FAMILIARITY WITH NATURE OF SPILLS AND HOW TO USE THEM
E	GENERAL PRACTICES	OS	GENERAL DAY TO DAY ITEMS TO PREVENT POLLUTION
F	STORM SEWER SYSTEM INSPECTIONS	MS	UNDERSTANDING HOW THE INSPECTION PROCESS WILL WORK AND WHY
G	SYSTEM MAINTENANCE	MS	GENERAL MAINTENANCE ITEMS
H	BMP OVERVIEW	MS	UNDERSTANDING WHAT BMPS ARE, HOW THEY WORK AND WHY WE USE THEM
I	SNOUTS	MS	UNDERSTANDING WHAT A SNOUT IS, HOW IT WORKS AND HOW IT IS MAINTAINED
J	INFILTRATION/DETENTION AREAS	MS	UNDERSTANDING HOW INFILTRATION AND DETENTION AREAS WORK AND ARE MAINTAINED
K	BASIC MATERIALS HANDLING	AS	UNDERSTANDING NATURE OF MATERIALS AND HOW TO HANDLE, USE AND DISPOSE
L	ILLICIT DISCHARGES	AS	FAMILIARITY WITH COUNTY ORDINANCE-RECOGNIZING AND HANDLING ILLICIT DISCHARGES
M	ROUTINE INSPECTIONS	MS	UNDERSTANDING NEED FOR AND BENEFITS OF ROUTINE INSPECTIONS

AS – ALL STAFF    MS – MAINTENANCE STAFF    OS – OFFICE STAFF

**TRAINING SUMMARY**

<b>FACILITY AND STAFF</b>	<b>PRIMARY MODULES</b>	<b>METHOD</b>	<b>FREQUENCY</b>
COUNTY MAINTENANCE STAFF	A-B-C-D-E-F-G-H-I-J-K-L-M	MEETING	ANNUALLY
ADULT PROBATION MAINTENANCE STAFF	A-B-C-D-F-G-H-I-J-K-L-M	MEETING	ANNUALLY
ADULT PROBATION OFFICE STAFF	A-B-D-E-L	MAILING	ANNUALLY
BULK STORAGE OFFICE STAFF - WAREHOUSE	A-B-C-D-E-L-M	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
BULK STORAGE OFFICE STAFF – CORONERS OFFICE	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
DJ BRETZ DRIVE OFFICE STAFF	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
DJ PAXTON CHURCH ROAD OFFICE STAFF	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
DJ ROLLESTON STREET OFFICE STAFF	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
DJ TWENTY NINTH STREET OFFICE STAFF	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
DRUG AND ALCOHOL BUILDING – ALL STAFF	A-B-D-E-L	MAILING	ANNUALLY
FORT HUNTER MAINTENANCE STAFF	A-B-C-D-F-G-K-L-M	MEETING	ANNUALLY
FORT HUNTER OFFICE STAFF	A-B-D-E-L	MEETING	ANNUALLY
PRISON MAINTENANCE STAFF	A-B-C-D-E-F-G-H-I-K-L-M	MEETING	ANNUALLY
PRISON OFFICE STAFF	A-B-D-E-L	MAILING	ANNUALLY
JUDICIAL CENTER OFFICE STAFF	A-B-D-E-L	MAILING	ANNUALLY
RECYCLING CENTER OFFICE STAFF	A-B-C-D-E-F-G-K-L-M	MEETING	ANNUALLY
SCHAFFNER ARC OFFICE STAFF	A-B-D-E-L	MEETING	1/PERMIT TERM
		MAILING	ANNUALLY
SCHAFFNER EMA OFFICE STAFF	A-B-C-D-E-L-M	MAILING	ANNUALLY
WILDWOOD LAKE OFFICE STAFF	A-B-D-E-L	MEETING	ANNUALLY

***APPENDIX B***  
***ILLICIT DISCHARGE PROCEDURES***

## **I. SCREENING PRIORITIZATION**

In order to prioritize outfall screening for regulated facilities, several factors are considered:

1. No system at any regulated facility has storm sewer system connections from offsite.
2. Several facilities connect to offsite MS4s. These facilities cannot be screened.
3. Nature of activities occurring at the site including:
  - Activities occurring the site
  - Substances stored or used at the site
  - Likelihood of accidentally spilled substances entering streams or storm sewers
4. Degree of public access to the site. This consideration is of primary importance.
5. Degree of surveillance at site. This consideration is of primary importance.
6. Availability of onsite maintenance staff
7. Extent and land use of offsite drainage area
8. System characteristics (age, extent, etc)
9. History of past issues. A history of issues may warrant automatic high priority designation and annual screening.

Based on these factors each site is assigned a priority (high, low or Not Screened if system discharges to an offsite MS4).

FACILITY	CODE	COMMENTS	PRIORITY	FREQUENCY
ADULT PROBATION	SC-DD-AP	LARGE IMPERVIOUS AREA ONSITE MAINTENANCE STAFF LIMITED PUBLIC USE 24 HOUR SURVEILANCE	LOW	1 PER PERMIT TERM
BULK STORAGE	SC-SS-BS	DISCHARGE TO OFFSITE MS4	NOT SCREENED	NA
DRUG AND ALCOHOL BLDG	PC-DD-DA	LIMITED PUBLIC USE	LOW	1 PER PERMIT TERM
DJ 29 TH STREET	SC-HS-TN	SMALL AREA LIMITED CHANCE OF ACCIDENTAL SPILL LIMITED PUBLIC USE LIMITED ACTIVITY AND SUBSTANCE USE DISCHARGE TO OFFSITE MS4	NOT SCREENED	NA
DJ BRETZ DRIVE	MC-RB-BD	SMALL AREA LIMITED CHANCE OF ACCIDENTAL SPILL LIMITED PUBLIC USE LIMITED ACTIVITY AND SUBSTANCE USE DISCHARGE TO REGIONAL DETENTION BASIN SEVERAL PCSM BMPS	LOW	1/PERMIT TERM
DJ ROLLESTON STREET	SC-HS-RS	SMALL AREA LIMITED CHANCE OF ACCIDENTAL SPILL LIMITED PUBLIC USE LIMITED ACTIVITY AND SUBSTANCE USE DISCHARGE TO OFFSITE MS4	NOT SCREENED	NA
DJ PAXTON CHURCH ROAD	PC-DD-PC	SMALL AREA LIMITED CHANCE OF ACCIDENTAL SPILL LIMITED PUBLIC USE LIMITED ACTIVITY AND SUBSTANCE USE	LOW	1 PER PERMIT TERM
FORT HUNTER	SR-DD-FH	READILY ACCESSIBLE TO PUBLIC ONSITE MAINTENANCE STAFF LACK OF SURVEILANCE	HIGH	2 PER PERMIT TERM VARYING CONDITIONS
PRISON	SC-DD-CP	LARGE IMPERVIOUS AREA ONSITE MAINTENANCE STAFF LIMITED PUBLIC ACCESS AND USE 24 HOUR SURVEILANCE	LOW	1 PER PERMIT TERM
RECYCLING CENTER	SC-LS-RC	DISCHARGE TO OFFSITE MS4	NOT SCREENED	NA
SCHAFFNER	SC-DD-SC	LARGE IMPERVIOUS AREA NO ONSITE MAINTENANCE STAFF LIMITED PUBLIC USE LIMITED ACTIVITY AND SUBSTANCE USE 24 HOUR SURVEILANCE	LOW	1 PER PERMIT TERM
WILDWOOD LAKE	PC-DD-WW	EXTREMELY SMALL DRAINAGE AREA ACCESIBLE TO PUBLIC	LOW	1 PER PERMIT TERM

## II. SCREENING PROCEDURE

### A. GENERAL

For the purposes of this section the following are defined:

SCREENING – Two observations conducted during dry weather over a period of no more than 14 days

OBSERVATION – A single visit to an outfall

Given the specific characteristics of the regulated facilities, it is believed that an illicit discharge is highly unlikely. Nevertheless, the screening protocol is necessary because it is required and because a procedure must be in place to guide the illicit discharge detection and elimination process if an illicit discharge is detected.

### B. SCHEDULE

The following implementation schedule will be used for screening. The schedule is a revised schedule. This schedule will be in effect for the indicated permit years. This schedule will be reviewed and revised as needed based on new regulated facilities, changes at existing facilities and other relevant factors.

	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018
DJ OFFICE PAXTON CHURCH ROAD	NOT SCREENED	NOT SCREENED	SCREENED	NOT SCREENED	NOT SCREENED
PRISON	NOT SCREENED	SCREENED	NOT SCREENED	NOT SCREENED	NOT SCREENED
ADULT PROBATION	SCREENED	NOT SCREENED	NOT SCREENED	NOT SCREENED	NOT SCREENED
SCHAFFNER	SCREENED	NOT SCREENED	NOT SCREENED	NOT SCREENED	NOT SCREENED
FORT HUNTER	NOT SCREENED	NOT SCREENED	NOT SCREENED	SCREENED	SCREENED
WILDWOOD LAKE	NA	NA	NA	NA	NA
DRUG AND ALCOHOL BUILDING	NA	NA	NA	NA	SCREENED
DJ OFFICE BRETZ DRIVE	NA	NA	NA	NA	NA

Low priority sites will be screened once per permit term during dry weather conditions in October or November. Dry weather conditions are defined as being a minimum of 72 hours after the most recent rainfall event.

High priority areas will be screened twice per year and in two years of each permit term. Each year screening will be conducted one in the spring, March to April, and once in the fall, October to November. If possible, one of these screenings may be conducted during a runoff event.

### C. FIELD PROCEDURE

1. A Conservation District staff member will conduct each screening. Staff will be equipped with the following:

- waterproof gloves
- safety goggles
- screening form
- camera
- sample collection containers
- storm sewer system map for the facility
- Field test kits for field parameters

- Temperature
- pH
- Ammonia
- Color
- Conductivity

2. At the outfall, the screener will:

- Take time and date stamped photos of the outfall whether or not there is a discharge
- Complete the outfall screening form

3. If flow is observed the screener will:

- Conduct field tests of the discharge for the parameters indicated on the field screening sheet. The parameters are selected based on likely pollutants as identified below.
- Collect a sample of the discharge
- Attempt to determine the source of the discharge using system maps, observation and inquiry of facility staff.

### D. IDENTIFICATION OF THE DISCHARGED SUBSTANCE AND SOURCE

If flow is observed, it is likely the flow is caused by a discharge that has occurred within a very short time frame of the screening. An immediate exploration of the cause will be the best opportunity to determine the source.

Based on the known information for the regulated facilities it is anticipated that screenings will rarely, if ever, detect any discharge during a screening. The rationale for this assumption is that none of the storm sewer systems have connections to the system from sources other than the facility itself. Further, there is little offsite drainage to the facilities. Nevertheless, it is possible that a discharge may be detected. In the event a discharge is detected the following procedures will be employed:

1. Attempt to determine the source of the discharge using system maps, observation and inquiry of the facility staff. If a flow is observed, it is likely the flow is caused by a discharge that has occurred within a very short time frame of the screening. An immediate exploration of the cause will be the best opportunity to determine the source.

2. If the source cannot be identified by an immediate exploration of the event, the sample collected may be sent to a lab for analysis. Parameters for which analysis is requested will be based on:

- Date collected and recorded on the field screening form
- Other factors such as land use in the area contributing flow
- Professional judgment

3. Based on the collected data, lab results, system maps and initial exploration and inquiry to facility staff, another attempt to determine the source will be conducted.

#### E. ELIMINATION OF THE DISCHARGE

1. If the source can be identified appropriate measures will be taken to eliminate the source and future discharges. The measures may include, as determined appropriate:

- Scheduled targeted education or training
- Review and revision of site procedures related to the discharge
- Physical adjustment to the site or storm sewer system
- Additional site screening
- Enforcement of the county Illicit Discharge Ordinance

2. If the source cannot be determined options for preventing future discharges will include:

- Reprioritization of screening
  - Additional site screening
  - Scheduled targeted education or training

#### F. DOCUMENTATION AND REPORTING

1. All measures taken to identify the pollutant and source and to eliminate the illicit discharge will be documented using appropriate forms, photos, lab results, meeting notes, summaries, records of enforcement, records of actions taken and any other documentation relevant to the incident. All records and documents will be kept in perpetuity at the offices of the Conservation District.

2. If appropriate, the discharge will be reported to the Pennsylvania Department of Environmental Protection.

### III. OTHER

A. All sites are county owned or operated. There are no access issues.

B. This program will be evaluated during the annual overall program review. Revisions will occur at that time.

C. There are no on lot systems within the storm sewersheds of any regulated facility.



***APPENDIX C***  
***LONG TERM OPERATION AND***  
***MAINTENANCE OF BMPS***

**1. DISCUSSION AND RATIONALE FOR LONG TERM OPERATION AND MAINTENANCE**

Currently, there are twelve BMPs installed at regulated facilities as follows:

FACILITY	BMP	CODE
BULK STORAGE BUILDING	DETENTION BASIN	SC-SS-BS-1-DB-1
PRISON	DETENTION BASIN	SC-DD-CP-4-DB-1
	SNOUT	SC-DD-CP-4-WQ-1
	SNOUT	SC-DD-CP-3-WQ-1
ADULT PROBATION	INFILTRATION AREA	SC-DD-AP-X-IA-1
	INFILTRATION AREA	SC-DD-AP-X-IA-2
	INFILTRATION AREA	SC-DD-AP-X-IA-3
	INFILTRATION BASIN	SC-DD-AP-3-IB-1
	SNOUT	SC-DD-AP-1-WQ-1
DJ BRETZ DRIVE	SUBSURFACE INFILTRATION	MC-RB-BD-1-SI-1
	WATER QUALITY BMP	MC-RB-BD-1-WB-1
	INLET DEVICE	MC-RB-BD-1-WQ-1

Each type of BMP has specific Operation and Maintenance (OM) requirements. In developing the OM procedures which follow, various factors have been considered. These include:

- Accessibility of BMP – Both physical and visual accessibility
- Expected need for OM – Anticipated debris and sediment accumulation
  - Drainage area
  - Activities and substances anticipated at facility
- Cost of OM – Balancing cost of OM with reasonable OM practices to ensure the proper functioning of the BMP.

**ADDITIONAL CONSIDERATIONS**

1. Maintenance of BMPs is indicated as being conducted “as needed”. As maintenance can be expensive, this is done to ensure that cost of maintenance is minimized rather than perform maintenance on a set schedule where it may not be needed. Over a period of time, the appropriate intervals between maintenance will become more evident.

Maintenance and clean out of the three snout devices was conducted in May 2016. This was the first maintenance conducted on the units since installation, approximately three to four years ago. None of the units had more than 9 inches of accumulated sediment. All three units had sediment accumulation of approximately 12 to 15 percent of the storage volume. Manufacturer specifications for these units indicate a cleanout depth of 50% of the available volume. Given this, maintenance will not be conducted annually. Maintenance will be based on measurements conducted during the twice annually inspections.

2. Each BMP will be inspected twice per year. This will allow a better prediction of actual maintenance requirements.

## 2. OPERATION AND MAINTENANCE PROCEDURES

Given the above considerations, following is an outline of the OM procedures for the BMPs currently employed. If, and when, additional BMPs are installed, similar procedures will be incorporated into this plan as needed.

**BULK STORAGE BUILDING** - The Bulk Storage Building has one BMP; a small detention basin.

DETENTION BASIN			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice annually	Erosion in the detention basin	As needed	Repair erosion
	Erosion in areas draining to detention basin		Remove accumulated debris and sediment
	Erosion at outfall		Repair inflow structures
	Accumulation of sediment or debris		Repair outfall structure
	Condition of inflow structures		Cut and remove vegetation
	Condition of basin berm		
	Condition of outflow pipe		
	Evidence that the basin is not draining		

**PRISON** – There are three BMPs at the prison facility; two snouts and one detention basin.

DETENTION BASIN			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice annually	Erosion in the detention basin	As needed	Repair erosion
	Erosion in areas draining to detention basin		Remove accumulated debris and sediment
	Erosion at outfall		Repair berm
	Accumulation of sediment or debris		Repair outfall structure
	Condition of basin berm		
	Condition of outfall structures		

  

SNOUTS			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice annually	Evidence at outlet of malfunction	As needed	Open and close observation hatch
	Buildup of floatable materials		Clean anti-siphon port
	Depth of sump storage used		Remove accumulated materials
	Device integrity		Repair device

**DJ OFFICE BRETZ DRIVE** – There are three BMPs at this location; a water quality BMP, a subsurface infiltration area and an inlet structure.

WATER QUALITY BMP			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice Annually	Erosion in or leading to area	As needed	Repair erosion
	Evidence that the area is not draining		Replace BMP if not draining

  

SUBSURFACE INFILTRATION AREA			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice annually	Erosion in the infiltration area	As needed	Repair erosion
	Evidence that the areas are not infiltrating		If area is not infiltrating, repair or replace

  

INLET STRUCTURE			
INSPECTION		MAINTENANCE	
SCHEDULE	ITEMS	SCHEDULE	ITEMS
Twice annually	Buildup of floatable materials	As needed	Remove accumulated materials
	Depth of sump storage used		Remove accumulated materials
	Device integrity		Repair device

**ADULT PROBATION BUILDING** - The Adult Probation facility has several BMPs. There is one Snout, one infiltration basin and three infiltration areas.

<b>INFILTRATION AREAS</b>			
<b>INSPECTION</b>		<b>MAINTENANCE</b>	
<b>SCHEDULE</b>	<b>ITEMS</b>	<b>SCHEDULE</b>	<b>ITEMS</b>
Twice annually	Erosion in the infiltration area	As needed	Repair erosion
	Accumulation of sediment or debris		Remove accumulated debris and sediment
	Evidence that the areas are not infiltrating		If area is not infiltrating, repair or replace
<b>INFILTRATION BASIN</b>			
<b>INSPECTION</b>		<b>MAINTENANCE</b>	
<b>SCHEDULE</b>	<b>ITEMS</b>	<b>SCHEDULE</b>	<b>ITEMS</b>
Twice annually	Erosion in the infiltration basin	As needed	Repair erosion
	Erosion in areas draining to infiltration basin		Remove accumulated debris and sediment
	Accumulation of sediment or debris		If area is not infiltrating, repair or replace
	Evidence that the areas are not infiltrating		Repair berm
	Condition of basin berm		Repair outfall structure
	Condition of outfall structures		
<b>SNOUT</b>			
<b>INSPECTION</b>		<b>MAINTENANCE</b>	
<b>SCHEDULE</b>	<b>ITEMS</b>	<b>SCHEDULE</b>	<b>ITEMS</b>
Twice annually	Evidence at outlet of malfunction	As needed	Open and close observation hatch
	Buildup of floatable materials		Clean anti-siphon port
	Depth of sump storage used		Remove accumulated materials
	Device integrity		Repair device

***APPENDIX D***  
***PROGRAM FORMS***



**MS4 FACILITY OPERATIONS REVIEW**

**DAUPHIN COUNTY**

IN ORDER TO COMPLY WITH FEDERAL AND STATE NPDES MS4 PERMIT REQUIREMENTS, DAUPHIN COUNTY MUST DEVELOP A GOOD HOUSEKEEPING PROGRAM FOR REGULATED COUNTY FACILITIES. TO ASSIST WITH THIS, PLEASE COMPLETE THE QUESTIONNAIRE BELOW.

<b>I. CONTACT INFORMATION</b>					
FACILITY	DAUPHIN COUNTY PRISON AND JUDICIAL CENTER				
PERSON COMPLETING	DAVE COLDREN	TITLE	MAINTENANCE SUPERVISOR		
PHONE	780-6799	EMAIL	dcoldren@dauphinc.org	DATE	11-13-14

<b>MATERIALS USED OR STORED AT FACILITY – PLEASE CHECK THOSE THAT APPLY – LIST OTHER</b>		
<b>MATERIAL</b>		<b>DESCRIBE (INCLUDE EXISTING POLLUTION PREVENTION MEASURES)</b>
PESTICIDES		
HERBICIDES		
FERTILIZERS		
COOLANT/ANTIFREEZE		
PETROLEUM PRODUCTS		
DEICING COMPOUNDS/SALTS		
SOLVENTS/DEGREASERS		
CLEANERS/DETERGENTS		
PAINTS		
FLUORESCENT BULBS		
ELECTRONICS		















**SPILL RESPONSE SUMMARY**

1. FACILITY INFORMATION			
FACILITY			
STAFF RESPONSIBLE			
PHONE		EMAIL	
2. SPILL INFORMATION			
DATE OF SPILL		LOCATION OF SPILL	
SUBSTANCE(S)			
DID SUBSTANCE ENTER SEWER		COMPONENT ID	
DID SUBSTANCE ENTER STREAM		NAME OF STREAM	
SPILL DESCRIPTION			
3. SPILL RESPONSE			
RESPONSE DESCRIPTION			
WHERE OTHER AGENCIES CONTACTED			
WHICH AGENCIES			
4. OTHER ACTION			

Location of Spill - please indicate where at the facility the spill occurred. For example, "in maintenance building" or "in chemical storage shelf".

Spill Description - include information on how the spill occurred. For example, "discovered leaking motor oil container" or "dropped a bag of road salt and bag split". Also include information on extent of spill. For example "leak was in a small area on shelf" or "spill ran across parking lot".

For Response Description describe how spill was contained, cleaned up, disposal method and any agencies that may have been contacted.

Other Action - Use this section to describe actions not related to spills. For example "picked up trash around dumpster" or "swept debris in dock area".

## DAUPHIN COUNTY MS4 PROGRAM

## ILLICIT DISCHARGE FIELD SCREENING FORM

PHOTOS MUST BE TAKEN AND ATTACHED TO ALL FIELD SCREENING FORMS

1. GENERAL INFORMATION				
FACILITY		ID		WATERSHED
DATE		TIME		
INSPECTOR		AGENCY		SIGNATURE
PHONE		EMAIL		

2. SITE CONDITIONS									
TIME SINCE LAST RAIN	<24 HOURS		24 – 48 HOURS		48-72 HOURS		>72 HOURS		AMOUNT
STRUCTURE TYPE	OPEN CHANNEL		CONCRETE	VEGETATED SWALE	ROCK/RIPRAP	OTHER			
	PIPE	MATERIAL	SHAPE						
LAND USES	RESIDENTIAL		COMMERCIAL		INDUSTRIAL		OPEN/UNDEVELOPED/FIELD		
	FOREST		INSTITUTIONAL		OTHER				
FLOW OBSERVED	Y	N	WIDTH		DEPTH	VELOCITY		RATE	
DESCRIBE FLOW	MOIST		SEEP	TRICKLE	LIGHT		MODERATE		HEAVY
SITE DESCRIPTION									

3. OBSERVATIONS										
ODOR	NONE	MUSTY	SEWAGE	SULFIDE	OIL/GAS	RANCID/SOUR				
	FAINT	EASILY DETECTABLE		STRONG		DETECTABLE FROM A DISTANCE				
COLOR	NONE	GREEN	RED	BROWN	YELLOW		ORANGE	GRAY		
CLARITY	CLEAR	SLIGHTLY CLOUDY		CLOUDY	VERY CLOUDY		OPAQUE			
FLOATABLES	NONE		OIL/SHEEN	SEWAGE	SUDS/FOAM					
	MINIMAL		LIGHT	MODERATE	HEAVY					
STAINS DEPOSITS	NONE		LIGHT	MODERATE	HEAVY					
	TYPE		STAIN	DEPOSIT	BOTH STAINS AND DEPOSITS PRESENT					
	SUBSTANCE		SEDIMENT	OIL	PAINT					
	PRESENT		AT FLOW LINE ONLY			IN FLOW CHANNEL				
	DESCRIPTION									

4. STRUCTURE AND VEGETATION									
VEGETATION CONDITION	DOWN FLOW FROM PIPE		NONE	NORMAL	EXCESSIVE	INHIBITED			
	PIPE BENTHIC GROWTH		NONE	PRESENT	COLOR	BROWN	ORANGE	GREEN	OTHER
COMMENTS									
STRUCTURE CONDITION	NORMAL			CORROSION	CRACKING	EROSION/UNDERCUTTING			
	CHIPPING OR SPALLING				OTHER				
COMMENTS									

5. FIELD AND LAB ANALYSIS									
TEMPERATURE		pH		AMMONIA		COLOR		CONDUCTIVITY	
WAS A LAB SAMPLE COLLECTED			Y N (ATTACH COPY OF CHAIN OF CUSTODY AND LAB RESULTS IF YES)						
DATE		TIME		BY					

6. COMMENTS/OBSERVATIONS									





DAUPHIN COUNTY MS4 PROGRAM

FACILITY FILE CHECKLIST

<b>FACILITY</b>	
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<b>MAPS</b>	<b>CHECK</b>
STORM SEWER SYSTEM MAP	
STORM SEWER SYSTEM SCHEMATIC MAP	
TOPOGRAPHIC MAP WITH OUTFALLS AND LATITUDE AND LONGITUDE	
AIR PHOTO WITH OUTFALLS AND LATITUDE AND LONGITUDE	
WATERSHED MAP FOR ALL DISCHARGES IF AVAILABLE	
<b>PPGH PLAN AND INVENTORY INFORMATION</b>	
CURRENT PPGH PLAN	
CURRENT PHOTOS	
CURRENT INVENTORY FORMS	
CURRENT OPERATIONS REVIEW	
<b>OTHER</b>	



DAUPHIN COUNTY MS4 PROGRAM

PERMIT FILE CHECKLIST

<b>FACILITY</b>	
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<b>CONSTRUCTION PERMIT DOCUMENTS</b>	
COMPLETENESS REVIEW COMMENTS	
COMPLETENESS REVIEW RESPONSE	
TECHNICAL REVIEW COMMENTS	
TECHNICAL REVIEW RESPONSE	
PERMIT ACKNOWLEDGEMENT	
COPY OF PERMIT	
N.O.T. NOTIFICATION	
N.O.T. ACKNOWLEDGEMENT	
WITHDRAWAL OR DENIAL DOCUMENTS	
CO PERMITTEE OR TRANSFER APPLICATION	
CO PERMITTEE OR TRANSFER ACKNOWLEDGEMENT	
<b>INSPECTIONS, COMPLAINTS AND ENFORCEMENT</b>	
INSPECTION FORMS	
COMPLAINT FORMS	
ENFORCEMENT DOCUMENTATION	
<b>PLAN DOCUMENTS</b>	
COPY OF ESPC PLAN	
COPY OF ESPC NARRATIVE	
COPY OF PCSM PLANS INCLUDING DETAIL SHEET	
COPY OF PCSM NARRATIVE	
<b>OTHER</b>	

FOR EACH PROJECT AT ANY FACILITY USE A SEPARATE CHECKLIST



**DAUPHIN COUNTY MS4 ACTIVITY RECORD FORM**  
**PERMIT YEAR:**

<b>1. ACTIVITY DESCRIPTIONS</b>				
<b>ACTIVITY TITLE</b>				
<b>ACTIVITY DESCRIPTION</b>				
<b>LOCATION</b>		<b>DATE</b>		<b>TIME</b>
<b>GEOGRAPHIC AREA</b>		<b>ATTENDANCE</b>		

<b>2. CONTACT INFORMATION</b>			
<b>COUNTY CONTACT INFORMATION</b>			
<b>NAME</b>		<b>TITLE</b>	
<b>PHONE</b>		<b>EMAIL</b>	
<b>DEPARTMENT</b>			
<b>OTHER CONTACT INFORMATION</b>			
<b>NAME</b>		<b>TITLE</b>	
<b>PHONE</b>		<b>EMAIL</b>	
<b>AGENCY</b>			

<b>3. DOCUMENTATION</b>	<b>ATTACHED</b>	<b>AVAILABLE UPON REQUEST</b>	<b>NOT AVAILABLE</b>
<b>COPY OF INVITATION</b>		<b>COPY OF HANDOUTS</b>	
<b>COPY OF AGENDA</b>		<b>COPY OF POWERPOINT</b>	
<b>COPY OF ATTENDANCE SHEET</b>		<b>COPY OF INSPECTION OR MAINTENANCE FORM</b>	
<b>COPY OF REGISTRATION SHEET</b>		<b>MAPS</b>	
<b>DISTRIBUTION LIST</b>		<b>OTHER</b>	
<b>COPY OF PHOTOGRAPHS</b>		<b>OTHER</b>	
<b>COPY OF PUBLICATIONS</b>		<b>OTHER</b>	

<b>4. TARGET AUDIENCE</b>	
<b>TARGET AUDIENCE</b>	
<b>COMMUNICATION CHANNELS USED</b>	

<b>5. MCM ADDRESSED – CIRCLE ONE TASK FOR EACH MCM AND BMP ADDRESSED</b>											
<b>MCM 1</b>		<b>MCM 2</b>		<b>MCM 3</b>		<b>MCM 4</b>		<b>MCM 5</b>		<b>MCM 6</b>	
<b>BMP</b>	<b>TASK</b>	<b>BMP</b>	<b>TASK</b>	<b>BMP</b>	<b>TASK</b>	<b>BMP</b>	<b>TASK</b>	<b>BMP</b>	<b>TASK</b>	<b>BMP</b>	<b>TASK</b>
1	ABCDEO	1	ABCDEO	1	ABCDEO	1	ABCDEO	1	ABCDEO	1	ABCDEO
2	ABCDEO	2	ABCDEO	2	ABCDEO	2	ABCDEO	2	ABCDEO	2	ABCDEO
3	ABCDEO	3	ABCDEO	3	ABCDEO	3	ABCDEO	3	ABCDEO	3	ABCDEO
4	ABCDEO	4	ABCDEO	4	ABCDEO	4	ABCDEO	4	ABCDEO	4	ABCDEO
5	ABCDEO	5	ABCDEO	5	ABCDEO	5	ABCDEO	5	ABCDEO	5	ABCDEO
6	ABCDEO	6	ABCDEO	6	ABCDEO	6	ABCDEO	6	ABCDEO	6	ABCDEO
7	ABCDEO	7	ABCDEO	7	ABCDEO	7	ABCDEO	7	ABCDEO	7	ABCDEO

<b>6. ACTIVITY CONDUCTED FOR</b>	
<b>COUNTY ONLY</b>	<b>ALL DAUPHIN COUNTY MS4 MUNICIPALITIES</b>
<b>SPECIFIC MUNICIPALITIES</b>	

<b>7. COMMENTS</b>