

LOWER PAXTON TOWNSHIP AUTHORITY

TUESDAY, FEBRUARY 25, 2025, -7:00 P.M.

Before the meeting the Authority will meet in executive session to receive information and legal advice from the Solicitor, and Authority Liaison

1. CALL TO ORDER - CHAIRMAN PRO TEM, MORGAN MADDEN
2. PLEDGE OF ALLEGIANCE - MR. BLAIN
3. ELECTION OF CHAIRMAN OF THE BOARD – CHAIRMAN PRO TEM
4. ELECTION OF VICE CHAIRMAN OF THE BOARD – CHAIRMAN
5. ELECTION OF THE SECRETARY OF THE BOARD – CHAIRMAN
6. ELECTION OF THE AUTHORITY TREASURER – CHAIRMAN
7. ELECTION OF THE ASSISTANT SECRETARY – CHAIRMAN
8. APPOINTMENT OF THE AUTHORITY SOLICITOR – CHAIRMAN
9. APPOINTMENT OF THE AUTHORITY STORMWATER ENGINEER - CHAIRMAN

Documents:

[2025 HRG RATE SCHEDULE.PDF](#)

10. APPOINTMENT OF THE AUTHORITY SANITARY SEWER ENGINEER - CHAIRMAN

Documents:

[2025 SERVICES_LETTER TO LPTA.PDF](#)

11. ESTABLISHMENT OF THE REGULAR MEETING SCHEDULE FOR BOARD MEETINGS- CHAIRMAN
12. GENERAL AUTHORITY - BUSINESS MEETING
13. PUBLIC COMMENT
14. CHAIR AND BOARD MEMBER COMMENTS
15. APPROVAL OF MINUTES - 11/26/2024

Documents:

[112624 AUTHORITY BOARD MTG MINUTES DRAFT.PDF](#)

16. SANITARY SEWER FUND - NEW BUSINESS

- 16.I. Public Meeting Results For The Wilshire Road Sewer Extension Project

Documents:

[WILSHIRE ROAD COST ESTIMATE MEMO.PDF](#)

- 16.II. Approval Of GHD Proposal To Prepare The COVID-ARPA PA Small Water And Sewer Grant Application For The Wilshire Sewer Extension Project

- Melissa Smith, GHD

Documents:

[PROPOSAL FOR GRANT APPLICATION FOR WILSHIRE ROAD.PDF](#)

16.III. Dedication Of Developer Installed Sewer

- Melissa Smith, GHD

Documents:

[FEB 2025 DEVELOPER DEDICATION MEMO.PDF](#)

16.IV. TOWNSHIP REPORTS - SANITARY SEWER

- A. BC-7A/B/C Sewer Replacement Construction Update
- B. PC-3E/ Clermont Sewer Replacement Construction Update
- C. PC-2E/F Trunkline Construction Update
- D. Swatara Dryer Project – Status of Construction and Payments
- E. CRW Rate Increase/IMA update
- F. Township Crew Projects – Misc sewer repair/replacement work
- G. Quarterly Financial Report

Documents:

[2025 Q1 AUTHORITY MEETING LARRY.PDF](#)
[SEWER AUTHORITY Q4 PRELIM 2024 FINANCE PACKAGE.PDF](#)

16.V. ENGINEER'S REPORT- SANITARY SEWER

Documents:

[FEB 2025 ENGINEERS STATUS MEMO LPTA.PDF](#)

17. STORMWATER FUND - NEW BUSINESS

17.I. TOWNSHIP REPORTS - STORMWATER

- A. DEP MS4 Permit/Joint PRP Projects
- B. DEP MS4 Permit Renewal Application – New Criteria and TMDL
- C. Township Crew Storm Sewer Replacements – 2025 Projects
- D. 2025 Budget Projects, 14 total – Friendship Basins Retrofit bid opening 2/26
- E. Quarterly Financial Report

Documents:

[2025_Q1_AUTHORITY_MEETING_LARRY.PDF](#)
[DRAFT MS4PERMITDRAFTMS4CRITERIAANDMS4CALCULATER.PDF](#)
[SEWER AUTHORITY Q4 PRELIM 2024 FINANCE PACKAGE.PDF](#)

17.II. ENGINEER'S REPORT - STORMWATER

Documents:

18. ADJOURN

Be advised that public meetings of the Authority may be recorded for audio and/or video purposes.



Herbert, Rowland & Grubic, Inc.
369 East Park Drive
Harrisburg, PA 17111
717.564.1121
www.hrg-inc.com

February 25, 2025

Mr. Bradley Gotshall, Manager
Lower Paxton Township and Authority
425 Prince Street
Harrisburg, Pennsylvania 17109

Re: 2025 HRG Rate Schedule

Dear Brad:

In accordance with our standard retainer agreement for engineering and related services, each year HRG reviews and updates our billing rates as necessary.

Please find enclosed our 2025 rates. All other terms of our agreement will remain the same.

These rates will be utilized for time and material projects such as subdivision, land development, and stormwater management plan reviews and miscellaneous services requested by the Township or Authority.

We will also provide lump sum or not to exceed proposals for Township and Authority specific projects.

In addition, we propose to continue to operate under the Authority Board retainer and per meeting fee structure, with a flat retainer fee of \$1,000 due annually and a per meeting fee of \$375 for each Authority Board meeting we attend as requested by the Authority.

No changes from the fees established in 2024 for Stormwater Fee Credit Application reviews are proposed by HRG in 2025.

We truly appreciate our continued relationship and look forward to a successful 2025 working together.

Please contact me if you have any questions or require additional information. Thank you.

Sincerely,

Herbert, Rowland & Grubic, Inc.

A handwritten signature in blue ink that reads "Jason R. Hinz".

Jason R. Hinz, P.E.
Group Manager | Civil

JRH/LB
R000184.0000

P:\0001\000184_0000\Admin\Control\2025 Retainer Renewal\2025 HRG Rate Schedule.docx



2025 RATES	
Labor Categories	Range
Administration I	\$65 - \$80
Administration II	\$80 - \$95
Environmental Scientist I	\$90 - \$120
Environmental Scientist II	\$120 - \$150
Senior Environmental Scientist	\$150 - \$165
Planner I	\$95 - \$120
Planner II	\$120 - \$145
Senior Planner	\$145 - \$175
Landscape Architect I	\$90 - \$120
Landscape Architect II	\$120 - \$150
Senior Landscape Architect	\$150 - \$165
Surveyor I	\$80 - \$115
Surveyor II	\$115 - \$140
Senior Surveyor	\$140 - \$165
GIS Professional I	\$90 - \$125
GIS Professional II	\$125 - \$140
Senior GIS Professional	\$140 - \$165
Resident Project Representative I	\$80 - \$120
Resident Project Representative II	\$120 - \$145
Senior Resident Project Representative	\$145 - \$165
Junior Technician	\$75 - \$95
Technician I	\$100 - \$130
Technician II	\$130 - \$155
Senior Technician	\$155 - \$180
Financial Specialist	\$115 - \$145
Financial Analyst	\$145 - \$170
Financial Strategist	\$170 - \$185
Engineering Professional I	\$130 - \$160
Engineering Professional II	\$160 - \$175
Project Engineer	\$175 - \$195
Senior Project Engineer	\$195 - \$205
Assistant Project Manager	\$145 - \$170
Project Manager	\$175 - \$195
Senior Project Manager	\$195 - \$210
Operations Manager/Senior Technical Leader	\$180 - \$230

All non-exempt employees have overtime rates of 1.5 times their normal billing rate.

PLEASE NOTE: Herbert, Rowland & Grubic, Inc., (HRG) adjusts the rate schedule annually to reflect the cost of doing business for the coming year. This rate schedule is effective January 1, 2025 through December 31, 2025.



2025 CURRENT BILLABLE EXPENSES	
All Terrain Vehicle	\$100.00/Day
Concrete Monuments	\$30.00/Each
Hydrographic System	\$100.00/Day
Lodging	At Cost
Maps, Permits, Licenses	At Cost
Meals	At Cost
Mileage	IRS Allowable
Miscellaneous Charges	At Cost
Pocket Colorimeter	\$50.00/Day
Postage	As Weighed
Sub-Surface Inspection Pole Camera	\$75.00/Day
Technology Equipment Charge	\$150.00/Day
Traffic Counters	\$25.00/Day
Wide Format Printing/Copying	\$.50/Square Foot

All expenses are subject to a 10% markup, including, but not limited to travel, printing, postage, survey supplies, etc.

PLEASE NOTE: Herbert, Rowland & Grubic, Inc., (HRG) adjusts the current billable expenses annually to reflect the cost of doing business for the coming year. These expenses are effective January 1, 2025 through December 31, 2025.

2025 STORMWATER CREDIT APPLICATION REVIEW FEES (PER APPLICATION)	
BMP Easement	\$220
Peak Rate Control/Volume Control Structural BMP	\$250
Riparian Buffer	\$220
Stream Restoration	\$1,500
Turf and Landscape Management Program	\$250
Permeable Pavement	\$220
Green Roofs	\$1,500
Separate MS4 Permit	\$1,700
Stormwater Partnership Credit	\$580
Agricultural Use Credit	\$250

PLEASE NOTE: HRG adjusts the fee schedule annually to reflect the cost of doing business for the coming year. This fee schedule is effective January 1, 2025 through December 31, 2025.

225 Grandview Avenue, Suite 403,
Camp Hill, Pennsylvania 17011
United States
www.ghd.com



Our ref: 12602419

February 06, 2025

Mr. David Blain, Chairman
Lower Paxton Township Authority
425 Prince Street
Harrisburg, PA 17112

Engineering Services for 2025

Dear Authority Members

The Consulting Engineer Agreement between the Lower Paxton Township Authority and GHD Inc. was adopted on March 23, 1999. We are pleased to continue our engineering services for 2025 under this Agreement. Attached, please find the following:

- Revised Exhibit A-1
- 2025 Rate Schedule
- Table 1 – Estimated Interim GHD Services

Revised Exhibit A-1 authorizes GHD to perform both the defined retainer efforts and budgeted engineering services for 2025. Additional services for the Authority can be authorized as needed.

We very much appreciate the opportunity to provide engineering and related services to the Authority, and we are looking forward to the privilege of serving the Authority again in 2025. If you have any questions or desire additional information, please do not hesitate to contact us.

Regards

A handwritten signature in blue ink that reads "Melissa Tomich Smith".

Melissa Tomich Smith, PE
Project Manager

717-309-4164
melissa.smith@ghd.com

A handwritten signature in blue ink that reads "Alton J. Whittle".

Alton J. Whittle, PE
Project Director

717-541-0622
alton.whittle@ghd.com

Copy to: Mr. Bradley Gotshall, Township Manager
Mr. William Weaver, Sewer Department Director

REVISED EXHIBIT A-1 TO AGREEMENT BETWEEN OWNER AND
ENGINEER FOR PROFESSIONAL SERVICES, dated
March 23, 1999 (for use with No. 1910-1, 1984 Edition).

Further Description of Engineering Services – Regular Annual Services

This exhibit, dated February 6, 2025, is attached to, made a part of and incorporated by reference into the Agreement made on March 23, 1999 between Lower Paxton Township Authority (OWNER) and GHD Inc., (ENGINEER) providing for professional engineering services.

In the provision of Regular Annual Services, the Engineer's duties shall be as follows:

General Retainer Services:

- A. Furnishing advice on the telephone (up to 15 minutes per conversation) in answer to telephone inquiries from time to time.
- B. Attending the following meetings in connection with the sewer system:
 - 1. Annual Swatara Township Authority meeting for participants in the 1985 Inter-Municipal Agreement.
 - 2. Meetings to discuss annual engineering budget (up to two meetings per year).
- C. Provide reports on all on-going engineering activities for Board Meetings.
- D. Provide monthly invoice summary letter.

Monthly Township Authority Meeting Attendance:

- A. Attend Monthly Township Authority meetings as requested (assuming 6 meetings per year)

Time of Service

The time period for the performance of Regular Annual Services shall be from January 1 through December 31, 2025.

Compensation for Regular Annual Services

The Authority agrees to pay in 12 equal payments of One Thousand Four Hundred and Seventy-Nine Dollars and Seventeen Cents (\$1,479.17), a total consulting retainer fee for Seventeen Thousand Five Hundred Dollars (\$17,750.00) per year, for the General Retainer Services noted above.

The Authority agrees to pay a separate fee of \$375 for each Township Authority Board Meeting GHD attends. For estimating purposes, we assume 6 meetings will be attended in 2025 for a total of \$2,250.00 per year. GHD will only bill for meetings attended.

The total Regular Annual Services fee is estimated to be Twenty Thousand Dollars (\$20,000.00). Invoices shall be submitted monthly and will cover the portion of the annual retainer from the previous month.

Additional Services

In addition to the Regular Annual Services described above, other services that can be provided by GHD at the request of the Authority may include, but are not necessarily limited to, the types of services described in Sections 2 and 3 of the agreement and the following:

- A. Training of wastewater facilities personnel.

- B. Assistance with preparation, modifications or revision of sewer use ordinances, or other related regulations.
- C. Conduct surveys, field investigations, gauging and sampling, and laboratory analyses of domestic, industrial and commercial wastewater.
- D. Conduct infiltration/inflow investigations and provide engineering for system rehabilitation.
- E. Provide investigation, field surveys, estimates, reports, designs and preparation of plans, specifications and contract documents in connection with improvements, extensions and capital additions.
- F. Provide study and revision or modifications of rate structures and schedules, including work on any special customer agreements.
- G. Assist in preparation of annual budgets for financial planning.
- H. Assist with DEP or other regulatory requirements including the preparation the PADEP Municipal Wasteload Management Annual Report in accordance with Chapter 94.
- I. Provide engineering services in connection with obtaining State and/or Federal grants or financial aid, and in connection with issuance of new bonds or other types of financing.
- J. Provide engineering services with respect to developer extensions.
- K. Provide construction phase services, including construction observation field services, in connection with improvements, extensions (including developer extensions), and capital additions.
- L. Provide services associated with Geographic Information Systems (GIS) and Information Technology (IT).

Compensation for Additional Services:

Unless agreed upon by separate exhibit, compensation for Additional Services will be in accordance with the attached 2025 Fee Schedule.

If at any point OWNER determines it would be in their best interest to assign full time GHD RPRs to the Lower Paxton Township Sewer Department, OWNER and ENGINEER shall agree on personnel and hourly rate(s) and execute a new Exhibit to the March 23, 1999 Agreement to provide the desired RPR services.

OWNER:
Lower Paxton Township Authority

(Chairman/Vice Chairman)

Attest:

Address for giving notices:

425 Prince Street
Harrisburg, PA 17109

ENGINEER:
GHD Inc.


(Executive Vice President)

Address for giving notices:

225 Grandview Avenue, Suite 403
Camp Hill, PA 17011



EXHIBIT 2

2025 Fee Schedule

Harrisburg, PA

Fees for engineering services rendered on a cost-plus basis are based on payroll costs plus an allowance for overhead and profit. Payroll costs are equal to direct salary charges plus payroll taxes and employee benefits. Expenses for subcontractors and other out-of-pocket expenses incurred in the performance of engineering assignments are billed at cost plus ten percent. Mileage is billed at the Federal IRS mileage reimbursement rate in effect at the time of the charge.

GHD Description	2025 Rates
PROFESSIONAL	
Senior Technical Director 1	\$ 220
Senior Technical Director 2	\$ 218
Senior Technical Director 3	\$ 210
Technical Director 1	\$ 200
Technical Director 2	\$ 177
Senior Professional 1	\$ 160
Senior Professional 2	\$ 150
Professional 1	\$ 133
Professional 2	\$ 120
Professional 3	\$ 112
Intern	\$ 89
TECHNICAL	
Senior Design Technician 2	\$ 153
Design Technician 1	\$ 143
Design Technician 2	\$ 133
Drafting/Design 1	\$ 128
Drafting/Design 2	\$ 125
Drafting/Design 3	\$ 120
Drafting/Design 4	\$ 112
Intern Drafting/Design	\$ 99
SITE BASED	
Senior Construction Manager	\$ 185
Construction Manager	\$ 170
Lead Site Engineer/Supervisor	\$ 155
Senior Site Engineer	\$ 140
Site Engineer	\$ 132
Lead Inspector	\$ 122
Senior Inspector	\$ 118
Inspector / Specialist 1	\$ 105
Inspector / Specialist 2	\$ 100
PROJECT SUPPORT	
Project Support 2	\$ 114
Project Support 3	\$ 107
Project Support 4	\$ 99
Project Support 5	\$ 92
Project Support 6	\$ 90

Lower Paxton Township Authority
Explanation of 2025 Engineering Expense Budget
October 28, 2024

FUND 036- CAPITAL EXPENDITURES:

Act 537/SSO Improvements: Account 36-4800-429.940 and 36-4800-429.941

• <u>36-4800-429.940 Paxton Creek</u>	<u>\$</u>	<u>0</u>
No work for GHD in 2025		
• <u>36-4800-429.941 Beaver Creek</u>	<u>\$</u>	<u>0</u>
No work for GHD in 2025		
<i>Total Engineering Budget 4800 Accounts 36-4800-429.940 and 36-4800-429.941</i>	<i>\$</i>	<i>0</i>

Sewer System Mini-Basin Rehab Program: Accounts 36-4900-429-940 through 36-4900-429.952

These costs are those associated with various aspects of engineering services for the mini-basin rehab program.

- 36-4900-429.940 GIS \$10,000
This is an allowance of \$10,000 to perform on-going edits to the GIS data and assistance with planning and implementation of asset management for the sanitary and storm sewer facilities, on an as requested basis by the Authority throughout the year.
- 36-4900-429.941 Engineering- Metering Data Analysis/ Hydraulic Modeling / Study/ Meetings and Reporting \$95,000
This is an allowance for completing the Beaver Creek Basin 2024 Program evaluation required under the consent decree and the ongoing data analysis of sub-basins and mini-basins by performing data processing throughout the metering season, metering and capacity evaluations, hydraulic modeling, and data requests and assistance with the Authority's metering program. This allowance also includes for the continued review and improvement relating to the successful implementation of the Beaver Creek and Paxton Creek Corrective Action Plans and similar efforts in Spring Creek and Asylum Run with periodic reviews of program cost-effectiveness, prioritization of rehabilitation and system improvements, evaluation of construction approaches, development of Annual DEP Progress Report, and annual review of projected project costs and billing rates, preparation and attendance at monthly internal progress meetings and the annual PADEP meeting.

A total of \$90,000 is projected for the remainder of the Beaver Creek Basin 2024 Program evaluation, the annual metering data analysis, and reporting as required by the Second Consent Decree. An additional amount of \$5,000 is included for misc. data requests, evaluations, hydraulic modeling, and alternatives planning outside of the annual requirements of the Second Consent Decree.

- 36-4900-429.943 Mainline External Repairs (Emergency Repairs Contract) \$8,000
Project costs include an allowance of \$5,000 for miscellaneous engineering costs associated with the 2023-2025 contract and \$3,000 to prepare, bid and award the 2025-2026 contract.
- 36-4900-429.944 Metering and Field Investigation \$2,000
This is an allowance for technical assistance with the flow metering program and wet weather field investigation assistance.

- 36-4900-429.961 Beaver Creek BC-2A/2B/2C and BC-5B \$10,000
This is an allowance for GHD to perform a site inspection in the spring to determine what plantings are still viable. GHD will prepare the required monitoring report to DEP and the Corps. GHD will prepare documents to get three quotes from contractors to install the plants as the work is anticipated to be below the bidding limits. The purchase of the new plantings and the installation is estimated at \$10,000.
- 36-4900-429.966 Beaver Creek BC-7A/7B/7C/7D \$10,000
Project will be substantially complete in 2024. This allowance is for finishing record drawings.
- 36-4900-429.951 Paxton Creek PC-2E/2F Trunkline and External Repairs Contract \$20,000
This \$20,000 allowance is for construction administration, wetlands inspection, project closeout and record drawings.

Total Engineering Budget Accounts 4900 36-4900-407.02 through 36-4900-429.72 \$155,000

2025 ENGINEERING EXPENSE DRAFT BUDGET SUMMARY:

TOTAL ALL FUND 036 SEWER OPERATING ACCOUNTS =	\$154,000
TOTAL ALL FUND 036 CAPITAL EXPENDITURES ACCOUNTS=	\$155,000
TOTAL ENGINEERING ALL FUNDS=	\$309,000

**LOWER PAXTON TOWNSHIP
AUTHORITY BOARD**

Minutes of the meeting held on November 26, 2024

A meeting of the Lower Paxton Township Authority Board was called to order at 7:00 p.m. by Chairman Blain on the above date at the Lower Paxton Township Municipal Center located at 425 Prince Street, Harrisburg, Pennsylvania.

Board members present, in addition to Chairman Blain, were Robin Lindsey, Chris Judd, Norman Zoumas, Paul Navarro, David Ramsey, and Allen McCormack. Also in attendance were Sam Miller, Assistant Township Manager/Finance Director, William Weaver, Morgan M. Madden, Solicitor, Jim Wetzal, Larry Stepansky, Jason Hinz, HRG, and Melissa Smith, GHD.

Pledge of Allegiance

Mr. Ramsey led the Pledge of Allegiance.

Approval of Minutes

Mr. Judd motioned to approve the August 27, 2024 meeting minutes. Mr. Zoumas seconded the motion. Mr. Blain called for a voice vote, and there was a unanimous vote of approval.

Public Comment

Steve Blain, 5732 Kenwood Ave., announced that he and his neighbors came before the Authority Board in May 2024 to tell the Board members that Doli would not be done with the sewer project, and it's not done. The residents received a letter from Mr. Weaver indicating what had been accomplished and what remained. He asked the board members if they had visited the project site. He added that some of the roads are unacceptable, but they took care of Kenwood Ave., However, other roads in the community are still unfinished, and it's a safety matter.

Mr. Steve Blain noted that the project was initially to be done at the end of September. However, the contractor was given an extension, and it's still not close to completion. He asked why the Township hasn't gotten the contractor to do the job and what the recourse is because the contractor is way behind.

Mr. Blain asked Mr. Weaver to provide an update on his conversations with Doli regarding the status of the contract and their tentative calendar of completion.

Mr. Weaver reported that the contractor provided a schedule for base paving, indicating that it would be done by mid-December. This schedule has been distributed to the public. The contractor has completed all but three streets, and they should return in the next three weeks, weather permitting, to complete Timber Lane, Raybuck Dr., and Cloverdale Rd.

Mr. Blain concluded that the contractor should complete the base paving by mid-December. He asked Mr. Weaver to provide some of the reasons for the delays. Mr. Weaver explained that utilities had to be relocated for the storm sewer work, noting that Kenwood Ave. had a gap at least six times for with different utility relocations. The contractor has no control over the utility companies; the Public Utilities Commission can control a utility company. Currently, the electric company is holding up the base paving, and there are still 120 feet of storm sewer to install on Cloverdale Rd.

Mrs. Lindsey asked Mr. Weaver to explain why Dolin hadn't done the curbs. Mr. Weaver asked Jason Hinz, HRG, to explain why the curbs haven't been installed, noting that the contractor recently provided a punch list to the engineer. Mr. Hinz read the punch list items, noting that curbing, sidewalks, mailboxes, and lawn restoration would be completed along Kenwood Ave. The paving schedule should not depend on those items, and there's no reason why the work can't be done whenever the contractor is available.

Mr. Steve Blain stated that the project would likely take another two months to complete, and he asked why the Township couldn't require the contractor to complete it.

John Packer, 5723 Kenwood Ave., mentioned the discussions at past Board meetings when he was told about the contract, and that the Township cannot control what the contractor does. He wanted to know if the contractor had been given another extension. The Township has already given the contractor an extension, which will expire in a few days. He asked, "What's the recourse for the Township?" The contract indicates that the Township can fine the contractor \$1,300 a day, yet they were given an extra 60 days with no fines and nothing to make them do more than they had already done. Mr. Blain explained that the Township is looking into the contract regarding fines and what might be available because the contractor is failing to meet the timelines. He referred Mr. Packer's question to Matt Madden, contractor. Mr. Packer declined the offer of an explanation regarding the contract and the imposition of fines. He continued to describe the conditions at the project site, noting that the contractor would not likely finish the project in two months. He complained that the Township isn't being proactive in pushing the contractor and using the contract to the advantage of the Township. He doesn't want this to happen in another part of the Township.

Mrs. Lindsey asked Mr. Hinz if anyone had contacted Doli to ask why they weren't progressing with the project. She wanted to know if the Township can ask the contractor where they've been.

Mr. Packer stated that the contract indicates an extension should not be granted when it is under the contractor's control. The concrete is under their control, and only one crew has been trying to do all the work, making it impossible for them to meet the deadlines.

Jason Hinz, HRG, reported that HRG staff have been involved in job conferences with the Township staff and Doli, where they discuss the schedule and outstanding items, as they are trying to conclude the project quickly and efficiently. Today, Mr. Weaver and the site superintendent met about their intentions to return and finish the base paving. The construction department for the Authority and superintendents are coordinating weekly updates. Mrs. Lindsey stated that she visited the site a week ago and again yesterday, and it didn't look like they did anything, and they aren't cleaning up the work site. Mr. Hinz reported that as of last week, Doli had one paving crew on site, one miscellaneous crew doing cleanup and punch list items, and a sub-contractor they use to do concrete work.

Steve Blain, 5732 Kenwood Ave., interjected, saying Doli would not be done with the concrete work for months, so now the job will be pushed back to February or March. The contractor is not taking full responsibility for the work they're doing, and it's lousy.

Mrs. Lindsey asked Ms. Madden if the Township had any recourse with Doli. Ms. Madden said that she would evaluate the contract and change orders, and the best answer was maybe.

Sanitary Sewer Fund - Business

Presentation and Action on the 2025 Sanitary Sewer Fund Budget

Mr. Weaver presented the 2025 Sanitary Sewer Fund Operations Budget, highlighting revenues and noting the projections at \$18,760,000. He said there are no major changes for expenses; expenses are \$20,222,263, the Capital Budget is 1.8 million, and expenditures are 14.4 million dollars, mostly for the Clermont project. The Stormwater Operating Fund's revenues are projected at 3.6 million dollars and expenditures at 3.4 million dollars.

Mr. Weaver noted that revenues still exceed the current expenses. The Capital Fund for Stormwater Revenues is \$471,000, and the Capital Project Fund is projected at 4.8 million dollars. There's an overall increase of 315 million in revenues versus the 2024 budget. This increase results from the continued anticipated growth at 100 sewer EDUs. There's an upward trend in permits due to construction on Colonial Road, such as Elizabeth Village, Parkway Farms, Nissley, and Cider Press Station. In 2023, revenues were unusually high, including funding from the Penn Vest loan and proceeds from the sale of Commerce Parklands. The revenues are up because of the trends in construction and interest earnings in 2022 and 2023. There's an overall increase of 3% in expenditures, primarily due to the increase from Capital Region Water and Swatara Township Treatment Plant related to transmission and treatment changes. The general administrative charges declined by \$152,000 and reductions in net standing costs for position changes in 2024. The overall growth in debt services is \$255,000, which is the new debt, and they'll begin paying. The financial reserves propose a decline of 1.5 million dollars to start in 2026.

Mr. Weave reported that Mr. Blain had discussions with Mr. Miller about the rate model, and he will present the rate model next year. The good news is that back in 2022, the reserves were around 20 million dollars because of the interest earnings, increase in revenues, and the sale of the land; the reserves are up to 22.9 million dollars. Therefore, when the Authority Board sees the new rate model, it will certainly help to have more cash in the bank, but then there was a discussion about some of the projects that weren't anticipated, so it may still even out.

Mr. Weaver presented the Sewer Fund Capital Budget, noting that revenues account for Capital Project Grants, interest earnings, and unspent Bond funds.

Mr. Weaver stated that Mr. Miller must handle some arbitrage; therefore, they may not get the full 6%; it's all about timing and which Bond issues they are. The Sewer Fund Capital Budget includes 1.6 million in total grants. The Sewer Authority was awarded a Commonwealth Finance Authority Grant for 1 million dollars and 1.4 million dollars for the Township's Claremont project and the interest earnings for the unspent debt balances. The capital expenditures total \$14 million from unspent issuance and earnings. The projects are cost share for the Paxton Creek North Branch Susquehanna project. He noted that they have not received a bill yet, but they did get a new Township Manager, and the bill may be issued shortly. He said there were some significant expenses from the external repairs contract and Paxton Creek overflow n 2E, the Claremont project, and the remaining BC-7 project, which increased expenses. More details come later. These reserves are projected to be depleted in 2024. GHD provided a report that includes the revised draw down report, and they are also working on the Stormwater draw down report.

Mr. Weaver reported an overall increase in revenue for the Stormwater Fund of 1%, and again, it's the same: just good economic growth. He noted that they anticipate 32,500 ERUs at \$6 a quarter, and the quarterly fees will remain unchanged, and the rate model will be done too, but it looks like it's in good shape. They also anticipate that static interest in earnings on operating funds will continue, and the rates will eventually decrease. He noted that revenues were consistent throughout all the presentations, and anticipated growth in Township permits is not expected to have a significant revenue growth impact, given the low residential fees for the stormwater. He added that the residential stormwater fees do not equal a lot to sewer fees. There is an overall increase of \$70,000 in expenditures in the Stormwater Fund Operating Budget versus the 2024 Budget: this amounts to about a 2% increase.

Mr. Weaver reported that the financial reserves are 7.4 million dollars to start 2026, and he would present the rate model and draw down on the capital side later in the evening. There are 4.9 million dollars in the Stormwater Fund Capital Fund budget for 2025. HRG is working on multiple projects at once; Paxton Creek 2 (PC-2), PC-3, Beaver Creek 7 (BC-7), Colonial Park, and in-house Stormwater Replacement Projects for 1.9 million. He noted that the staff have saved the Authority a lot of money. The reserves are 2.3 million dollars, and the Bond issue is in better shape.

Mr. Blain asked if the Sanitary Sewer and Stormwater rates would increase. Mr. Weaver said the rates will not increase. Mr. Blain announced that it is good news; the rates will stay the same.

Mrs. Lindsey motioned to approve the 2025 Sanitary Sewer Fund Budget. Mr. Blain seconded the motion. Mr. Blain called for a voice vote and the vote was unanimous.

Approval of Correspondence to Wilshire Residents for Sewer Force Main Extension

Mr. Weaver reported that back in 1966, the Townships paved Wilshire Road. They came to the Authority and said that since they are paving the street, putting a dry sewer line in may be a good idea. Unfortunately, there wasn't a lot of planning on the sewer side, and they expected growth to occur so the sewer could be extended. However, the land to the East was never developed, so the sewer line goes nowhere. To accommodate the sewer for the residents who live in this neighborhood, a pump station must be installed, and they aren't happy about it and would prefer a gravity sewer; however, Melissa Smith of GHD completed a study demonstrating that the gravity sewer is more expensive. He noted that Mrs. Smith provided recommendations for the low-pressure sewer system that would serve 13 properties, one of which is a vacant lot.

Mr. Weaver stated that the homeowner could connect to a force main that was installed by McNaughton Homes in Phase 2B of the Wilshire Development, but the homeowner would have to get an easement; therefore, he must work with the solicitor to see if they proceed with the project, can they still charge the front foot assessment and if they could get to the force main, and that would bump up the cost for the other homeowners. He said Melissa Smith, GHD, and Heather Myers, SEO, were present to answer questions. He noted that the homeowners have septic systems that aren't functioning properly; the systems aren't failing, but they aren't working well. For the Authority to demand sewer service installation, they would need to get a letter from the PA Department of Environmental Protection (PA DEP) advising residents that their systems are failing and that they must do something. He provided estimates and assessments for each property, noting the total cost would be about \$25,000. The Authority mailed information about the Penn Vest loan to property owners; this is an affordable, low interest loan with repayment terms of \$124 per month. There's a easy option, if the property owners opt out, then the solicitor advise them that the Authority has the option to place a lien on the property and they must do it themselves. Therefore, they are recommending that the residents be surveyed. The Authority has the following Alternatives to consider alternative 1: Do nothing and continue with the property owners utilizing their existing on-lot systems. Alternative 2: Send letters to each of the 13 property owners discussing the project and asking for their input about their system's functionality and if they favor the low-pressure sewer extension. Then, we will move forward with the extension if most property owners favor the project. Alternative 3: Wait until the system has failed and cannot be repaired or replaced; then, they must complete the project because PA DEP will mandate the sewer connection.

Heather Myers, GHD, reported that she has been in contact with one of the residents struggling with her septic system and must get it pumped frequently. Only one or two people live at the residence, so there's not a lot of flow going into the system. The lot is less than 4/10 of an acre. She noted that the neighborhood is also served by individual wells, which greatly impacts the siting of potential septic systems because the system must be 100 feet away from any well on or off the property with a new on-lot system. So, the available area to site a new system is limited.

Mrs. Lindsey asked if the residents had been informed of the options. Mr. Weaver explained that they have not been told; the letter is for that. He noted that it does not require a vote from the Authority Board, just consensus, because no money is being spent or guaranteed.

Mrs. Smith, GHD, stated that she is recommending option 2 because some homeowners have asked for public sewer service. She noted that is the appropriate thing to do because some homeowners might not know how much money it will take to extend the sewer system, because the Township has an ordinance that dictates if a homeowner has a sewer that fronts their property, they're mandated to tie into the public sewer system. Therefore, if the sewer system is extended to help some homeowners, it will also burden the people with working systems.

Mr. McCormack suggested that the Authority contact the property owners individually or have a meeting to explain the options instead of sending a survey. That way, if the property owner has questions, they can get answers right away rather than going back and forth. Mr. Weaver said he likes the idea and thinks they should send the survey and schedule a meeting. Mr. Weaver noted that the Sewer authority holds public meetings for all projects.

Mr. Judd said that the homeowner must pick an option before they get any more information.

Mr. Blain suggested that Mr. Miller host the meeting before sending the survey; Mr. McCormack's idea is good. Mr. Judd asked how they plan to set up a meeting if they don't send a letter out. Mr. Blain explained that no one would host a meeting without sending something out to notify the residents of the potential project that could require a connection to the sanitary sewer line. Mrs. Lindsey asked if the residents knew that their neighbors had contacted the Township about their problems. Mr. Weaver said that people with problems have talked to each other.

Mr. Weaver offered a third option, as with the sewer easements. They sent the property owners an easement agreement and strongly recommended that they schedule a meeting with the Authority Engineer and staff because of the disturbance to the property. He suggested they send the survey. He recommended that the residents schedule a meeting and provide their name, email, and telephone number. He explained that the engineers have worked in similar situations, but this is his first in 40 years. However, Mr. McCormack's idea is a good one. He asked Mr. Hinz and Mrs. Smith to share their thoughts. Mrs. Smith said she, too, likes Mr. McCormack's idea and thinks they should offer private consultation so that no one feels they are being ganged up on. Mr. Judd and Mr. Blain agreed.

Township Reports

Project Letter Schedule Update

Mr. Weaver reported that they are providing more communication as directed by the Authority board. They've always had a very powerful website, and Tim Nolt deserves all the credit because he pushed for it for years.

Mr. Weaver stated that the Lower Paxton at Work website has six projects listed, and residents can access the site and look at the area to see which work zone they are in. Mr. Weaver explained that if a resident wants an update, they can email My New Sewer, and the Authority will respond to the message with any schedule changes or updates. Additionally, they will send residents correspondence with more information about upcoming projects and what to expect.

Updated on Current PA DEP Consent Decree Design/Construction Projects
and DEP Annual Meeting Held 09/17/24

Mr. Weaver provided an overview of the presentation at the PA DEP annual progress meeting held on September 17, 2024. They averaged over 90% excess I/I removal. They reached 100% removal rates on some projects. They removed over 40 mgd of peak hourly I/I from the sanitary sewer system. This approach was cost-effective at \$3.17/gpd of I/I removed. They also provided a Wet Weather Comparison, noting the program's success in reducing the overflow. There were seven overflows when they started, and now just four remain. Fortunately, they are at 100% I/I removal, and with the corrective action plans, they hope to achieve that.

Mr. Blain commented that it was just amazing; he, too, recalls that 20 years ago, there was an overflow in every storm, especially along Nyes Road. It is certainly amazing how much I/I they've taken out of the system.

Mr. Weaver reported that the 2021 Beaver Creek Corrective Action Plan is done, and moving forward, they must develop a new Corrective Action Plan (CAP). There's one project left in Paxton Creek: the Claremont project. The sanitary sewer work is complete for BC-7, Paxton Creek.

Mr. Weaver reported that they are working on the Claremont project and doing the trunk line he mentioned; the letter will be sent, and they are doing a flow analysis in Spring Creek. He noted that they have barely been in compliance with Spring Creek since the gate valve was installed. However, planning must be done years in advance. The remaining action item is the Beaver Creek capacity program evaluation. In mid-to-late January, he will meet with Tim Nolt, Melissa Smith, and Alton Whittle. In Paxton Creek, once the PC-2E/2F Trunk Replacement Project is complete, they will assess the project's impact on the overflow potential and evaluate any I/I removal. In Spring Creek, they will address the trunk sewer as the recent flow metering demonstrates that two mini basins would be the next project. However, there's no development at Spring Creek because it's built out, and there's no need to create capacity for growth.

Mr. A. Acknowledged Mr. Weaver for a job well done.

Quarterly Financial Report

Mr. Weaver noted that Mr. Miller has analyzed the budget for the last three years and that it is pretty much the same. The revenues and interest earnings are up due to sewer rentals, interest earnings, and tapping fees. He reviewed the expenses, noting some changes because the auditor wanted to see the payroll. Again, as Mr. Miller pointed out in the budget presentation, the biggest issues in the budget are the debt service, which is 30%, and the cost due to Swatara Township's Treatment Plant and Capital Region Water (CRW), which make up the other 30%. He noted that 60% of the expenses are debt service, payroll, and transmission treatment costs, which have remained consistent other than CRW and Swatara Township's increases.

Mr. Blain added that overall, the report contains no surprises. The expense side seems to be stable, and on the revenue side, there are some increases because of interest.

Engineer's Report

Melissa Smith, GHD, reported on the Annual Report to DEP, noting that DEP will entertain the design storm event because many of the flood level definitions revolved around local flooding. With all the extra work the Township is doing with stormwater, it's getting harder for the local flooding. GHD didn't want to see the Township get penalized for making improvements. They agreed to the design storm, and GHD is working on modeling that design. Alton Whittle will attend the next Authority meeting to discuss the design storm event.

Mrs. Smith reported that they had a discussion at the annual DEP meeting. She advised that they move a couple of the surcharge monitoring stations, primarily the two in Spring Creek, due to the Township's success in other areas. The GHD staff worked with Mr. Weaver and the staff to figure out when the next Bond issue would be needed, and she had mentioned that it would be needed closer to the end of 2026. Primarily because the PC-2, PC-E, and PC-3 trunk lines were added after the homeowner report on his property. She reviewed the minor projects, noting that the Authority staff have been going out to televise lines whenever they receive customer complaints, and they find some things in the system that need to be fixed. They found some areas scoring high on the Nasco reports, such as the rating system for defects. They wanted to be proactive and fix the issues so the Bond money would run out sooner than anticipated. Mr. Weaver added that the bad news is the report shows they will run out of money at the end of next year; that's usually a crisis, and they get P M in and begin to look at borrowed money. He noted that Mr. Miller has some great ideas, and they will look at two of them next year.

Mr. Weaver stated that one idea will require the solicitor's input: borrow money from the Stormwater Fund and then do it together when there's a need to borrow money for Stormwater

and Sewer. There are 22 million dollars in reserves, and they can use money from the reserves and then pay it back or do another analysis that way. They are looking at this option because they don't want to bring PFM in next year and start borrowing more money. When they show this borrowing in conjunction with the rate model, if there's new debt, then the rates must increase, and they know the Authority Board doesn't want to do that. Therefore, they are being creative financially to minimize the impact on the ratepayers.

Mrs. Smith continued reviewing the engineer's report, noting that the Trunkline project will start at the beginning of the year. They might be clearing up at the end of the year, and that's why she would like to get the letters out sooner than later. The miscellaneous repairs are under the same contract as PC-2 Trunkline, and the contract was staggered, so they're doing the trunkline first and the miscellaneous repairs. The BC-2, 3, & 2C project is done. Still, as part of the Township's permit with DEP, the wetlands and the wetland plantings, some forested wetlands that were replaced or moved died due to the drought over the summer; therefore, they need to go back and want to reestablish the wetlands.

Mrs. Smith reported that the property on Peterborough Road has a failing on-lot system. They suggested that the owner tie into the public sewer by a grinder pump because the sewer terminates in front of the property next to them. It's only a couple of 100 feet from the property line. Mr. Weaver noted that this issue came up seven years ago. Heather Myers sent a notice to the property owner. They moved people out because the system was overloaded because of occupants, and then they moved back in. Ms. Myers sent another notice to the owner, and just yesterday, she sent an email to him and Mr. Wetzel requesting a meeting. Mr. Weaver noted that he sent the owner the Penn Vest loan information with the hope of reaching out to advise them that they are looking at legal issues and potential fines.

Mr. Weaver explained that the next step involves the solicitor providing options for sending a violation letter with some stiff penalties. Now that Ms. Myers has emailed the owner, they can meet and get the homeowner to connect with the sewer system. The neighbor complained about the sewer smell coming from the cleanout.

Ms. Myers explained that it has been an ongoing problem mainly attributed to the number of people living in the home because there are multiple families in a single-family dwelling. The septic system is sized for a certain amount of flow. They allowed the homeowner to fix the issue, which has abated over the years. It has dried up at times but seems more of an issue in the spring. The issue is based on the topography, and the overflow tends to flow onto the neighbor's property, and that's how she found out about the problem.

Jim Whittle reported that the homeowner called the Sewer Authority to complain about sewage backing up into the house on Stanford Drive. The staff went to the property to investigate and determined that the sewer main had collapsed. They ordered the repair immediately. The main asked Mrs. Smith if Stanford Lane would be paved next fall. Mrs. Smith

confirmed that the paving would begin in the fall of 2025.

Mrs. Smith reported that GHD is working with the Authority staff to update the Standard Construction and Material Specifications for the Wastewater Collection System Extension and hopes to have that finalized for the Authority board approval in May 2025. Mr. Weaver noted that the stormwater provisions would be added to the specifications.

Mrs. Smith reported that Alton Whittle works with the Authority staff on the Landfill Meter. The landfill meter tends to accumulate sediment, just different items coming out of the landfill, which makes the flume reading inaccurate.

Mrs. Smith said the Township staff cleans it out periodically, but it gets red, and seems to be overbilling for the landfill. GHD will work with the Authority staff to find a solution to the problem.

Mr. Weaver commented that this issue has been going on for a long time. About seven years ago, the Township came to the Authority about the bill because the landfill bill increases every time it rains, creating the landfill leachate. The landfill goes right into Swatara's system and doesn't use the Township's collection system. Jeff Wendell came up with a formula to charge the Township's cost to Swatara. He noted that the landfill has a special rate, and it's more than half of what the residents pay, and that helped for a while. Then they found out that the meter wasn't working; when the sediment in the leachate builds up in the flume, it artificially raises the level, and the Township pays more. Alton White came up with a correlation factor to show that the Township shouldn't be billed as much because they see the increase and it automatically fluctuates during a storm. There's a lot of money at stake for the Township and the Authority because landfill flow is part of the EDU sent to Swatara Township's Authority. The budget is an estimate of total EDUs coming from the Township, and that's where the charges come from every year. The landfill EDU bill is inflating the Township and Authority's total cost to Swatara Township. He noted that Swatara Township will not agree with the engineer's correlation factor; they will want accurate metering results. Therefore, it will be a tough analysis, and the Authority may have to do some sewer work there and move a meter to make it work; it may cost the Authority more money up front but save money over 10 to 20 years; there will be a payback.

Stormwater Fund - Business

Presentation and Action on the 2025 Stormwater Fund Budget

**Action on the RETTEW Engineering Services Proposal
for the Mountain View Acres Stormwater Improvement Project**

Approval of ICA Task Order 2024-01 for the MS4 JPRP Greenbelt Project

Township Reports

Update on DEP JPRP MS4 Projects

LPT Crew Projects Schedule and Work Completed 2024

Review of Stormwater Bond Projects Drawdown

Quarterly Financial Report

Engineering Report

Announcements

Mr. Blain announced that the next town meeting is scheduled for Tuesday, November 26, 2024, at 7:00 p.m. at the Municipal Center.

Mr. Navarro thanked the staff, engineers, and Mr. Weaver for the great job, and Mr. McCormack agreed.

Adjournment

Mr. Zoumas moved to adjourn the meeting, Mr. Blain seconded it, and the meeting adjourned at 9:26 p.m.

Respectfully submitted,

Approved by,

Shellie Smith
Recording Secretary

Chris Judd,
Secretary

DRAFT

Technical Memorandum

February 21, 2025

To	David Blain, Chairman	Contact No.	N/A
Copy to	William Weaver, Sam Miller	Email	Melissa.smith@ghd.com
From	Melissa Tomich Smith	Project No.	11207954.2024.01
Project Name	Wilshire Road		
Subject	Cost estimate to connect homes to the public sanitary sewer system		

1. Summary of Neighborhood Meeting

As a result of the Authority's review of GHD's November 21, 2024 memo at the November 26th Board meeting, the Board directed GHD to prepare a power point presentation (copy attached) and hold a public meeting with the affected property owners. The presentation outlined the potential project to extend a low-pressure sewer extension to the 12 homes along Wilshire Road that are currently served by on-lot septic systems and the 1 vacant lot.

The Board's requested special neighborhood meeting was held on Wednesday January 29, 2025. During that meeting, the details of the low-pressure sewer extension were presented along with the costs the homeowners would incur. Those costs include the following items: 1) Front foot assessment for project design and construction, 2) Tapping Fee, 3) grinder pump purchase and installation, 4) abandonment of the septic system and rerouting the piping to the grinder pump (costs not estimated), and 5) the quarterly sewer bill. These costs differ slightly for each property due to the front foot assessment and are presented in Section 3 below.

The property owners were provided time to discuss if their on-lot systems are working or not and what concerns they have with continuing to rely on these systems. They were also asked about their appetite for extending the public sewer after knowing the costs associated with a public sewer extension.

One of the property owners that originally approached the Township was present and stressed the problems with his system. Others present discussed issues that were not previously known by the Township. In all, there appears to be four properties with on-lot systems that are not functioning as intended. These property owners requested that sewage enforcement officer (SEO) visit the properties to assess if the systems are considered failed or not.

Staff expressed that the project would only move forward if the majority of the property owners were in agreement, as all of the property owners would be required to pay the front foot assessment and connect to the sanitary sewer system if the sewer is extended. The property owners in attendance expressed interest in the project but were vocal about the high cost to connect. The property owners requested the following information and assistance from the Township and Board:

1. That the Authority provide a contribution to one or both of the following:
 - a. The front foot assessment costs;
 - b. The grinder pump purchase and installation costs;

2. That the Authority provide for the installation of the 12 grinder pumps via a Township/Authority Contract and property owners pay that cost as part of the front foot assessment;
3. That the Authority complete the project and installation of the grinder pumps and the property owners pay as an additional cost to their sewer bill.
4. What the PENNVEST loan interest rate is currently and what the estimated monthly payment would be if the project moves forward. Mr. Weaver has already followed up with the property owners as he has confirmed that the PENNVEST Loan, administered by PHFA, is still available at 1.75% and that the payment would be approximately \$124/month on a \$25,000 loan.
5. That the Authority apply for a grant for the public portion of the project. GHD has reached out to the PA Department of Community and Economic Development that issues small water and sewer program grants. Only facilities that will be publicly owned would apply for the grant and the Authority would be required to fund 15% of the project if a grant is awarded. These grants are competitive and not guaranteed.
6. Assistance in evaluating their existing on-lot septic system and on lot system replacement costs for comparison to the public sewer project.

Since there were additional requests from the property owners that could not be answered at the special meeting, a letter to each property owner asking for their vote was postponed until the Board could review the requests. Notification of the postponement has been provided to each of the thirteen (13) property owners, see attached correspondence from the Sewer Department Director. Additionally, as noted above, several owners requested immediate assistance to determine if the on-lot system is failing. See attached letter to those specific property owners requesting they contact the SEO to schedule an inspection.

2. Authority Project Costs Scenarios Including Grinder Pumps vs Excluding Grinder Pumps

2.1 Authority Installed Low-Pressure Sewer System, including grinder pumps

As previously discussed, the Authority would install a low-pressure sewer main, 13 low pressure laterals, and 13 curb stop assemblies as shown in Figure 1 below. The low-pressure main would then discharge the collected sewage into manhole BC-6B 382.13, the closest gravity manhole. A grinder pump and basin is required for each property to connect to the low- pressure main.

Figure 1: Low Pressure Sewer Extension Layout



The full cost for the Authority to design and install the main, laterals, curbstops and flushing manhole are estimated at \$368,000, including the purchase and installation of the grinder pumps, as shown in Table 1 below.

Excluding the purchase of the grinder pumps, the full cost for the Authority to design and install the main, laterals, curbstops and flushing manhole are estimated at \$152,000, as shown in Table 1A below.

Table 1 **LOW PRESSURE SEWER EXTENSION ESTIMATED AUTHORITY PROJECT COSTS INCLUDING GRINDER PUMPS**

Item Description			Quantity	Cost
Low Pressure Force Main and Laterals with Curb Stops				
1.5" HDPE Lateral ⁽¹⁾	LF	\$45	260	\$11,700
2" HDPE Low-Pressure in Road with Tracer Wire - Assume directionally drilled.	LF	\$55	975	\$53,625
Terminal Flushing Manhole	EA	\$12,500	1	\$12,500
Grinder Pump and Basin	EA	\$15,000	12	\$180,000
1.5" Curb Stop Assembly	Each	\$300	13	\$3,900
Misc.				
Pavement Restoration. 10x10 patches for lateral connection, complete in place ⁽²⁾	SY	\$45	120	\$5,400
Curb Replacement, complete in place. Concrete Curb	LF	\$155	60	\$9,300
Tie into Existing Gravity Sewer ⁽³⁾	LS	\$5,000	1	\$5,000
SUBTOTAL				\$281,425
CONTINGENCY 20%				\$56,285
ENGINEERING				\$30,000
TOTAL ESTIMATED PROJECT COSTS (rounded)				\$368,000
<u>Notes:</u>				
(1) Length of pipe cost estimate does not include the building sewer. Laterals are assumed to be 20 LF.				
(2) Assumes no overlay pavement is required.				
(3) Tie into existing gravity sewer cost estimate includes paving around MH 382.13.				

Table 2A **LOW PRESSURE SEWER EXTENSION ESTIMATED AUTHORITY PROJECT COSTS EXCLUDING GRINDER PUMPS**

Item Description			Quantity	Cost
Low Pressure Force Main and Laterals with Curb Stops				
1.5" HDPE Lateral ⁽¹⁾	LF	\$45	260	\$11,700
2" HDPE Low-Pressure in Road with Tracer Wire - Assume directionally drilled.	LF	\$55	975	\$53,625
Terminal Flushing Manhole	EA	\$12,500	1	\$12,500
1.5" Curb Stop Assembly	Each	\$300	13	\$3,900
Misc.				
Pavement Restoration. 10x10 patches for lateral connection, complete in place ⁽²⁾	SY	\$45	120	\$5,400
Curb Replacement, complete in place. Concrete Curb	LF	\$155	60	\$9,300
Tie into Existing Gravity Sewer ⁽³⁾	LS	\$5,000	1	\$5,000
SUBTOTAL				\$101,425
CONTINGENCY 20%				\$20,285
ENGINEERING				\$30,000
TOTAL ESTIMATED PROJECT COSTS (rounded)				\$152,000
<u>Notes:</u>				
(1) Length of pipe cost estimate does not include the building sewer. Laterals are assumed to be 20 LF.				
(2) Assumes no overlay pavement is required.				
(3) Tie into existing gravity sewer cost estimate includes paving around MH 382.13.				

3. Costs to the Property Owner

The following summarizes the costs to the Property Owners under the following conditions:

Option 3A-Grant is obtained:

- Authority applies for and is awarded the grant. Each Property Owner would only pay a Tapping Fee of \$3,143.00 to the Authority.

Option 3B-Grant is not obtained:

- Property Owners pays the front foot assessment, grinder pump purchase and installation, tapping fee and the costs to abandon the existing septic system and connect to the public sewer system.
- The costs to abandon the existing septic system and connect to the public sewer system were not estimated as the location and type of existing system is not known. Property Owners will need to obtain quotes from plumbers and electricians and personally contract and pay for that work.

Table 2 *Option 3B- Grant is not obtained*

Property Address	Length of Street Frontage per Property (ft)	Front Foot Assessment per Property	Estimated Price per Grinder Pump	Tapping Fee	Total Estimated Cost per Property Owner
Vacant Lot	87	\$8,093.02	\$15,000.00	\$3,143.00	\$26,236.02
5363 Wilshire Road	151	\$14,046.51	\$15,000.00	\$3,143.00	\$32,189.51
5364 Wilshire Road	110	\$10,232.56	\$15,000.00	\$3,143.00	\$28,375.56
5370 Wilshire Road	96	\$8,930.23	\$15,000.00	\$3,143.00	\$27,073.23
5371 Wilshire Road	101	\$9,395.35	\$15,000.00	\$3,143.00	\$27,538.35
5372 Wilshire Road	104	\$9,674.42	\$15,000.00	\$3,143.00	\$27,817.42
5374 Wilshire Road	177	\$16,465.12	\$15,000.00	\$3,143.00	\$34,608.12
5375 Wilshire Road	201	\$18,697.67	\$15,000.00	\$3,143.00	\$36,840.67
5377 Wilshire Road	100	\$9,302.33	\$15,000.00	\$3,143.00	\$27,445.33
5378 Wilshire Road	127	\$11,813.95	\$15,000.00	\$3,143.00	\$29,956.95
5379 Wilshire Road	101	\$9,395.35	\$15,000.00	\$3,143.00	\$27,538.35
5380 Wilshire Road	156	\$14,511.63	\$15,000.00	\$3,143.00	\$32,654.63
5381 Wilshire Road	123	\$11,441.86	\$15,000.00	\$3,143.00	\$29,584.86
Total	1,634	\$152,000.00			

4. Recommendations

It is recommended the Board apply for the grant and put the project on hold until the decision regarding the award is made by the Commonwealth Financing Authority.



LOWER PAXTON TOWNSHIP

BRADLEY N. GOTSHALL,
Township Manager

Department of Sewer

William Weaver, *Director*

BOARD OF SUPERVISORS:

ROBIN L. LINDSEY, *Chair*
NORMAN C. ZOUMAS, *Vice-Chair*
CHRIS JUDD, *Secretary*
PAUL W. NAVARRO, *Treasurer*
PAMELA M. THOMPSON, *Asst. Secretary/Treasurer*

February 14, 2025

NAME

ADDRESS

ADDRESS

**RE: Wilshire Road Sanitary Sewer Extension – Low Pressure Force Main Project
Summary of the Neighborhood Meeting held on Wednesday, January 29, 2025, at 7 PM**

Dear:

The following is a summary of our special neighborhood meeting held on Wednesday January 29, 2025, for the proposed Wilshire Road Sewer Extension, Low Pressure Force Main project. Property Owners in attendance expressed an interest in the public sewer project contingent upon the final project costs to each property owner. Therefore, the survey of each of the property owners for an answer of yes or no on this project will be postponed to a later date.

The Lower Paxton Township Sewer Department staff and GHD will be providing the meeting summary to the Authority at the regular meeting scheduled for Tuesday, February 25, 2025, at 7 PM. Residents in attendance at the neighborhood meeting requested more information before completing the survey, including; 1) Authority contribution to the front foot assessment costs; 2) Authority contribution to the Grinder Pump Installation Costs; 3) Can the Authority provide for the installation of the 12 grinder pumps via a Township/Authority Contract and property owners pay as part of the front foot assessment; 4) Following answers to #1-#3, what is the PENNVEST loan interest rate and estimated monthly payment. Note: Following the meeting staff confirmed PENNVEST Loan, administered by PHFA, is still at 1.75% and the payment would be approximately \$124/month on a \$25,000 loan.

Also, property owners in attendance would like assistance in evaluating the existing on-lot septic system and on lot system replacement costs for comparison to the public sewer project. As indicated at the meeting, the Authority is not permitted to provide engineering for private systems, however, if approved by the Authority, staff can evaluate systems in the neighborhood and provide recommendations. This request will also be presented to the Board. Staff will be sending separate letters to schedule inspections for residents who indicated they are currently having issues with the private on lot system.

If you have any questions, please do not hesitate to email me or call me at 717-657-5617, extension 1112.

Sincerely,

A handwritten signature in blue ink, appearing to read "WR Weaver", is written over a light blue circular stamp.

William R. Weaver
Sewer Department Director/Authority Liaison

425 PRINCE STREET, HARRISBURG, PA 17109
717-657-5600 / FAX 717-724-8311
www.lowerpaxton-pa.gov

@LowerPaxtonTwp

@LowerPaxtonTwp

@LowerPaxtonTownship



LOWER PAXTON TOWNSHIP

BRADLEY N. GOTSHALL,
Township Manager

Department of Sewer

William Weaver, *Director*

BOARD OF SUPERVISORS:

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PAUL W. NAVARRO, *Treasurer*
PAMELA M. THOMPSON, *Asst. Secretary/Treasurer*

February 14, 2025

NAME
ADDRESS
ADDRESS

**RE: Wilshire Road Sanitary Sewer Extension – Low Pressure Force Main Project
Summary of the Neighborhood Meeting held Wednesday, January 29, 2025, at 7 PM**

Dear:

Thank you for attending our special neighborhood meeting held on Wednesday January 29, 2025, for the proposed Wilshire Road Sewer Extension, Low Pressure Force Main project. It is our understanding that you may be having issues with your private on lot system. The Township SEO, Heather Myers, is available to perform an inspection of your private on lot system. Please schedule the inspection with Heather Myers directly at Heather.Myers@ghd.com, or by phone at 717-585-6431.

If you have any questions, please do not hesitate to email me or call me at 717-657-5617, extension 1112.

Sincerely,

A handwritten signature in blue ink, appearing to read "WR Weaver".

William R. Weaver
Sewer Department Director/Authority Liaison

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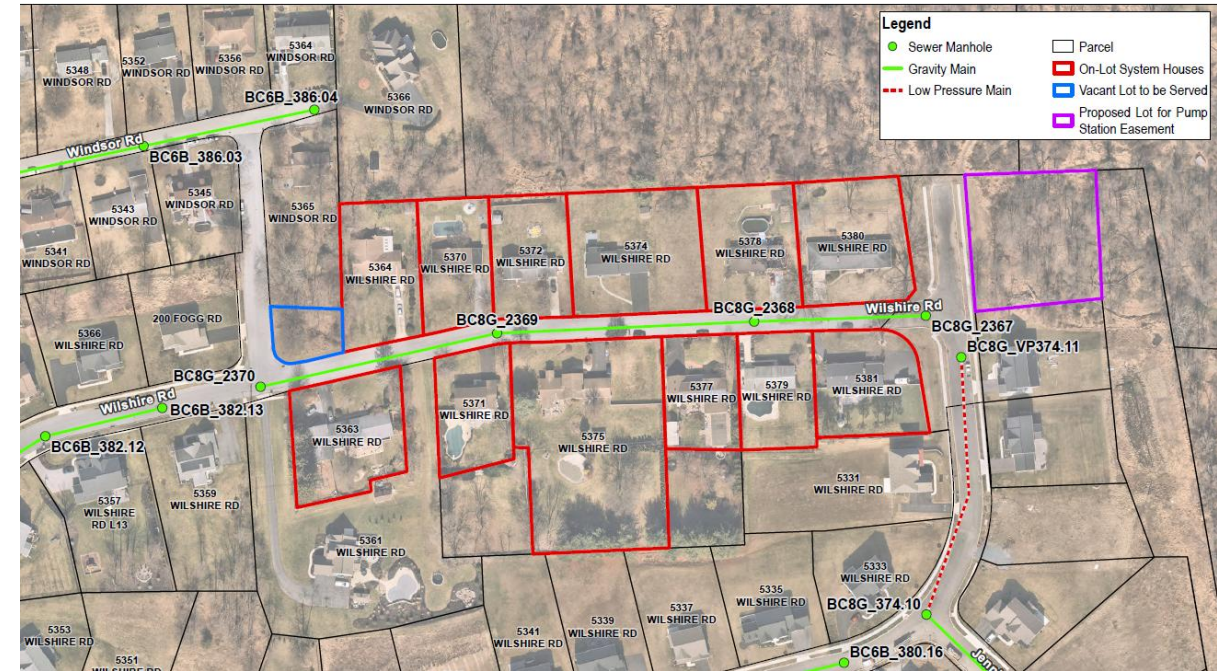
→ **Melissa Tomich Smith, PE**
Project Director

Wilshire Road Proposed Sewer Extension/Low Pressure Force Main

Welcome

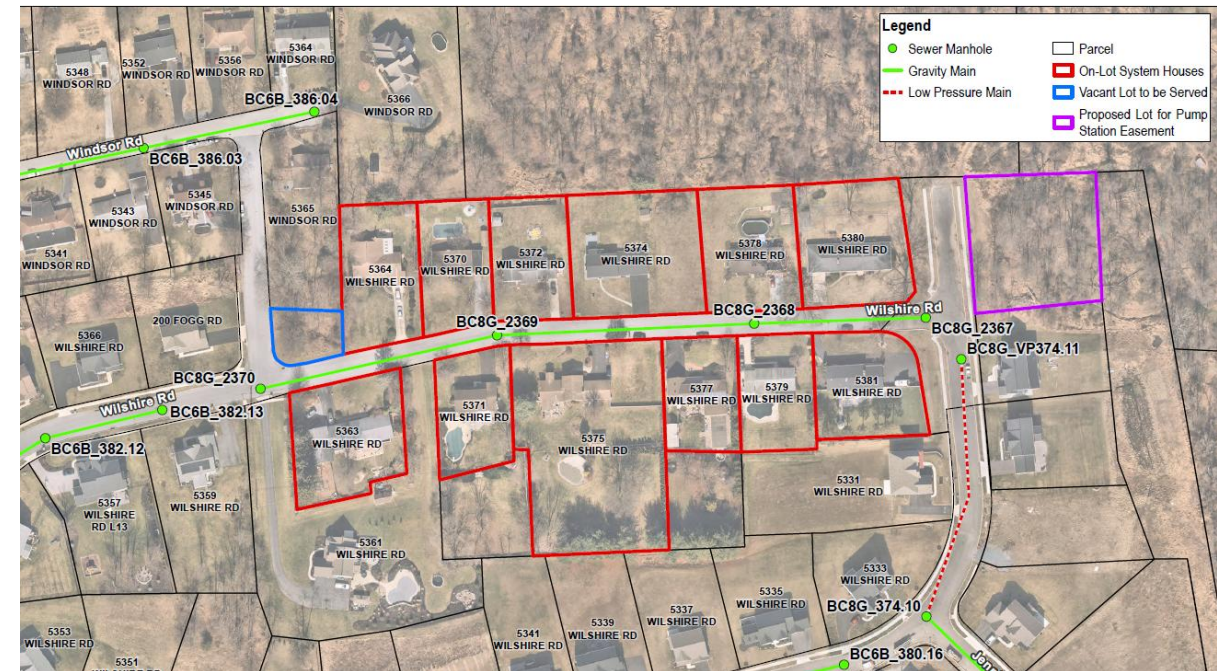
Introduction

- In 1988 a dry sewer was installed along Wilshire Road.
- The installation anticipated future connection to a public sewer system through future development extended sanitary sewers.
- Twelve houses (outlined in red) and one vacant lot (outlined in blue) along Wilshire Road are currently served by on lot septic systems.
- A few of the homeowners have requested connecting into the public sanitary sewer system.



Study to Provide Public Sanitary Sewer Service

- The developer for Wilshire Estates Phase 2 designed the development so that they did not require a pumping station. Therefore, there is no pumping station for the existing dry sewer to tie into and gravity sewers cannot tie into the low-pressure sewer main installed by the developer (dashed red line).
- Developers are not required to provide service for properties adjacent to their land.
- The developer did offer to donate the land (outline in purple) to the Authority.
- A study was done to provide options to provide public sanitary sewer.



OPTION 1 –Pumping Station and Force Main

- Option 1 consists of the following:
 - Utilizing the dry gravity sanitary sewer and laterals that are already in place
 - Installing approximately 150 linear feet of new 8-inch gravity pipe to connect the dry sewer to a new wet well
 - Installing an above ground Gorman Rupp ASVP Lift Station, and
 - Installing 1,200 linear feet of 4-inch force main. The force main would then pump the collected sewage to manhole BC-6B 382.13, the closest gravity manhole.
 - Property owners would be required to hire a contractor to connect the house to the public system.



OPTION 2 – Low Pressure Sewer System

- Option 2 consists of the following:
 - Abandoning the dry sewer.
 - Installing approximately 1,200 LF of low-pressure sewer main
 - Installing 13 low pressure laterals with curb stop assemblies
 - The low-pressure sewer system would discharge the collected sewage to manhole BC-6B 382.13, the closest gravity manhole.
 - Property owners would be required to hire a contractor to purchase and install a grinder pump and connect the house to the public system.



Chosen Option

→ **Option 2 – Low Pressure Sewer Extension**

Option 2 was chosen for the following reasons:

- The condition of the dry sewer is unknown.
- The estimated project cost was significantly less.
 - Option 1 = \$507,000
 - Option 2 = \$152,000

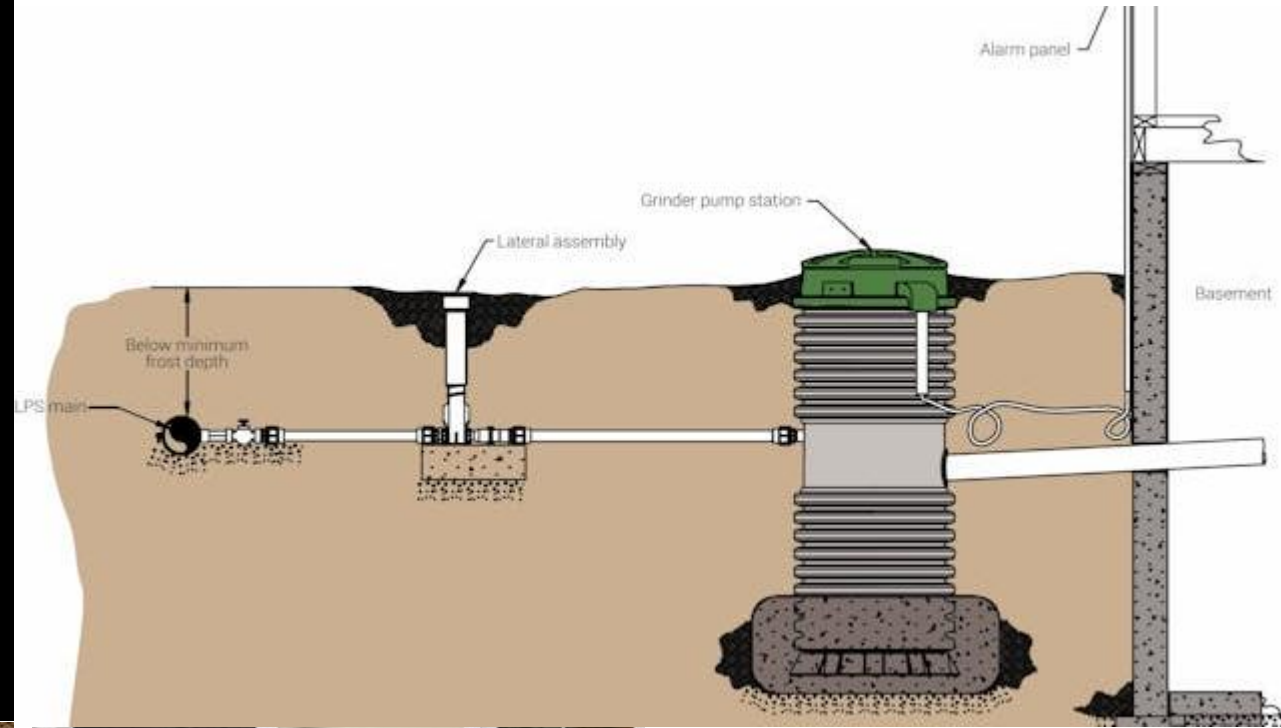
Low-Pressure Sewer System

Installing approximately 1,200 linear feet of 2-inch HDPE low-pressure pipe

Each property would need to purchase and install a grinder pump



Images of Grinder Pumps



Cost Estimate

PRELIMINARY CONSTRUCTION-COST OPTIONS				
Items	Unit	Estimated Unit Prices	Low-Pressure System	
			Quantity	Cost
1.5" HDPE Lateral ⁽¹⁾	LF	\$45	260	\$11,700
2" HDPE Low-Pressure in Road with Tracer Wire	LF	\$55	975	\$53,625
Terminal CO MH	EA	\$12,500	1	\$12,500
1.5" Curb Stop Assembly	Each	\$300	13	\$3,900
Misc.				
Pavement Restoration. 10x10 patches for lateral connection, complete in place	SY	\$45	120	\$5,400
Curb Replacement, complete in place. Concrete Curb	LF	\$155	60	\$9,300
Tie into Existing Gravity Sewer ⁽²⁾	LS	\$5,000	1	\$5,000
SUBTOTAL				\$101,425
CONTINGENCY 20%				\$20,285
ENGINEERING				\$30,000
TOTAL ESTIMATED PROJECT COSTS (rounded)				\$152,000
<u>Notes:</u>				
(1) Length of pipe cost estimate does not include the building sewer.				
(2) Tie into existing gravity sewer cost estimate includes paving around MH 382.13.				

Mandatory Connection if Sewer is Extended

- If public sanitary sewer is extended. All 12 homes will be required to connect per Ordinance No. 99-08, excerpt sited below.
- A service line and curb stop will be provided to the vacant lot, and the vacant lot will be assessed the front foot assessment. The tapping fee would be paid at the time of connection.

Per Lower Paxton Township Authority Ordinance No. 99-08, Adopted 8-17-1999 Chapter 159-26:

The owner of any improved property accessible to and whose principal building is within 150 feet of the sewer system shall connect such improved property therewith, in such manner as the Township and the Authority may require, within 60 days after notice to such owner from the Township and the Authority may require

Costs to Property Owners

If the public sanitary sewer is extended, each property owner will be required to pay the following:

- Front Foot Assessment
- Tapping Fee
- Purchase and installation of a grinder pump
- Costs for a plumber to tie the existing plumbing into the public system. (These costs were not estimated and are not provided in the following cost estimate table.)
- Ongoing quarterly sewer bill. The current sewer bill is \$158/quarter.
- Ongoing electric bill: estimated to be between \$40 and \$60 a year.

Front Foot Assessment

- The Municipal Authority's act allows for Authorities to recover the costs expended to extend public sanitary sewer service, from the properties that benefit from the extension using a front foot assessment.
- The cost per Linear Foot of street Frontage is the total cost of the public improvement divided by the total linear footage of street frontage.
- The assessment per Property is then calculated by multiplying the cost per linear foot of total street frontage by the individual property's length of street frontage.

Tapping Fee

- Tapping fees are charged to all properties connected to the public sanitary sewer system.
- Tapping fees are a one-time charge paid to connect a property to a public water or sewer system.
- Tapping Fees are used to recover each user's portion of the cost of building and maintaining the conveyance system and treatment facilities.
- Beaver Creek Drainage Basin Tapping Fee is \$3,143 per property
- Per Authority Resolution 23-09
 - There is hereby established, fixed and imposed a tapping fee upon the owner of each property making any connection to the Authority's sanitary sewer system directly or indirectly, regardless of whether such property is connected separately through one or more existing or new laterals sewers or sewer connections, including changing the type of use of property previously connected, increasing the volume of discharge over the original estimate, shall pay to the Authority a special purpose tapping fee per Equivalent Dwelling Unit (EDU).

Cost Estimate – Per Property

Property Address	Length of Street Frontage per Property (ft)	Front Foot Assessment per Property ⁽²⁾	Estimated Price per Grinder Pump ⁽³⁾	Tapping Fee	Total Estimated Cost per Property for the Main, Lateral and Grinder Pump
Vacant Lot	87	\$8,093.02	\$15,000.00	\$3,143.00	\$26,236.02
5363 Wilshire Road	151	\$14,046.51	\$15,000.00	\$3,143.00	\$32,189.51
5364 Wilshire Road	110	\$10,232.56	\$15,000.00	\$3,143.00	\$28,375.56
5370 Wilshire Road	96	\$8,930.23	\$15,000.00	\$3,143.00	\$27,073.23
5371 Wilshire Road	101	\$9,395.35	\$15,000.00	\$3,143.00	\$27,538.35
5372 Wilshire Road	104	\$9,674.42	\$15,000.00	\$3,143.00	\$27,817.42
5374 Wilshire Road	177	\$16,465.12	\$15,000.00	\$3,143.00	\$34,608.12
5375 Wilshire Road	201	\$18,697.67	\$15,000.00	\$3,143.00	\$36,840.67
5377 Wilshire Road	100	\$9,302.33	\$15,000.00	\$3,143.00	\$27,445.33
5378 Wilshire Road	127	\$11,813.95	\$15,000.00	\$3,143.00	\$29,956.95
5379 Wilshire Road	101	\$9,395.35	\$15,000.00	\$3,143.00	\$27,538.35
5380 Wilshire Road	156	\$14,511.63	\$15,000.00	\$3,143.00	\$32,654.63
5381 Wilshire Road	123	\$11,441.86	\$15,000.00	\$3,143.00	\$29,584.86
	1,634	\$152,000.00			\$387,859.00

Notes:

1. The cost per Linear Foot of street Frontage is the total cost of the public improvement divided by the total linear footage of street frontage.
2. The assessment per Property is the calculated by multiplying the cost per linear foot of total street frontage by the individual property's length of street frontage.
3. Homeowners will be responsible for buying the grinder pumps and hiring a plumber to install them. The Authority's project will stop at a valve placed at the property line. We recommend getting three quotes to purchase and install a grinder pump as the price could range between \$10,000 and \$20,000.

Homeowner Sewage Program

- PENNVEST, in cooperation with the Pennsylvania Housing Finance Agency (PHFA), provides low-cost financing to improve, replace, or repair individual on-lot sewage disposal systems, and existing malfunctioning connections to public sewage systems, or to connect, for the first time, to public sewer to meet public health and environmental safety standards.
- Maximum loan amount is \$25,000; minimum is \$2,500
- Up to 20 years to repay the loan balance (up to 15 years for manufactured homes)
- Fixed interest rate for life of loan, currently as low as 1.75 percent.
- Average payment for a \$25,000 loan is approximately \$124/month.

Homeowner Sewage Program | Infrastructure Investment Authority | Commonwealth of Pennsylvania

Next Steps

- The Authority has not yet approved this project and may not proceed if the majority of the property owners are not in agreement with the project.
- If the project is approved by the Authority, the Township Board of Supervisors must also approve the project. Also, it should be noted that if the project is approved, and public sewer is extended, connection to the sanitary sewer system is mandatory for all properties.
- A separate letter/survey will be sent to each of the property owners to request each property owners answer of “yes” or “no” on this project moving forward.
- The survey results will be provided to the Authority Board at the regular meeting scheduled for Tuesday February 25, 2025. This meeting is open to the public.
- Each owner will receive a notice of the final decision of the Board.



*** Thank You**

Our ref: 11207954

February 20, 2025

Mr. David Blain, Chairman
Lower Paxton Township Authority
425 Prince Street
Harrisburg, PA 17112

Engineering Services to Prepare an Application for a COVID-19 ARPA PA Small Water and Sewer Grant For the Wilshire Road Low Pressure Sanitary Sewer Extension

Dear Mr. Blain,

GHD is pleased to provide this agreement to assist the Lower Paxton Township Authority to apply for a COVID-19 American Rescue Plan Act - PA Small Water and Sewer Grant currently offered by the PA Department of Community & Economic Development.

1. Project Understanding

There are twelve existing homes, and one vacant lot, along Wilshire Road that are currently served by on-lot septic systems as there are no public sanitary sewers located that front the properties. In 1988 a dry sanitary sewer was installed within the street in anticipation of being able to connect to a public sanitary sewer system when development occurred and extended sanitary sewer service.

These residents attended a public meeting to discuss the potential for a low-pressure sewer extension and requested that the Authority look into applying for a grant to offset the front foot assessment that each homeowner would be responsible to pay if the sewer is installed.

2. Grant and Project Analysis

The Covid-19 ARPA PA Small Water and Sewer Grants are awarded to small water, sewer, storm sewer and flood control infrastructure projects where the total project cost is not more than \$500,000. The preliminary construction cost estimate to extend a low-pressure sewer system to serve the 13 properties along Wilshire Road and install grinder pumps is \$368,000. The associated costs for the design and permitting would also be requested in the application.

Table 1 Grant Threshold and Matching Requirement

Grant Threshold	Small Water and Sewer Grant
Total Project Costs	\$30,000 - \$500,000
Matching Fund Requirement	15%

3. Proposed Scope of Work

GHD proposes to work closely with LPT staff to gather information and prepare all documents needed based on the grant guidelines. GHD will also reach out to contractors, state representatives, the County Planning Commission, etc. as needed. The materials required for a complete grant application include but are not limited to:

- Complete the DCED Online Portal Application
- Prepare a clear and concise description of the project; including project summary, need for project, project location, start and end dates of construction and who has site control.
- Prepare a detailed cost estimate, signed and dated by engineer/qualified professional within one year of application.
- Prepare a matching funds commitment letter from all other secured project funding sources.
- Prepare a color-coded map detailing the location of the proposed transportation project
- Obtain a planning letter certifying the project is compliant with comprehensive land use plans.
- Provide a resolution letter for the governing board requesting the grant.
- Prepare a permit list required for the project.
- Provide an income demographics for project area.
- Complete a Federal Funding Accountability and Transparency Act (FFATA) Sub-Recipient Data Sheet.

4. Compensation & Timeline

GHD will complete these engineering services for the not-to-exceed fee of \$5,000 in accordance with GHD's current Fee Schedule and Consulting Engineering Agreement dated March 23, 1999. Should a change in scope be necessary, a price adjustment will be agreed to by mutual consent.

GHD will complete all necessary application forms and supplemental documentations for submittal. A draft of the application package will be provided to LPTA for review and comments prior to final submission.

The application deadline for the current round of applications is April 30, 2025.

If you have any questions or need additional information, please feel free to contact us. We look forward to assisting LPTA on the project.

Regards



Melissa Tomich Smith, PE
Project Manager

717-5856347
melissa.smith@ghd.com

Copy to: Mr. Bradley Gotshall, Township Manager
Mr. William Weaver, Sewer Department Director

Memorandum

17 February 2025

To	David Blain, Chairman		
Copy to	William Weaver, Sewer Department Director and Samuel Miller, Assistant Township Manager/Finance Director		
From	Melissa Smith	Tel	717-541-0622
Subject	Developer Installed Sanitary Sewers to be Dedicated to the Authority	Project no.	11208032

The following developer installed sanitary sewer extensions are currently offered to the Authority for dedication:

- Wilshire Estates Phase 2C:
 - Sewer main and manhole plats and legal descriptions were submitted and approved by GHD. The signed dedication document has been provided.
 - Record drawings were submitted and approved.
 - **Outstanding:** receipt of 15% Maintenance bond.
- Nissley Run:
 - Sewer main and manhole dedication documents, plats and legal descriptions were signed, submitted and approved.
 - Record drawings were submitted and approved.
 - The driveable surface will not be installed along the right-of-ways until the houses are built and the final grading is known. Therefore, the Authority is holding the remaining ESCROW for the project until that item is complete instead of holding up the dedication of the sewers.
 - Contractor has raised manholes to final grade without inspection and without applying the required Sika Guard 62 epoxy coating on the outside of adjustment material therefore a Vacuum test will be performed by LPTA prior to the Maintenance Bond expiring and if any manhole cannot pass a vacuum test, the manhole will be required to be excavated at the adjustment point to have the Sika Guard applied to the exterior of the manhole.
 - **Outstanding:** receipt of 15% Maintenance bond.
- Parkway Farms Phase 2:
 - **Outstanding:** Sewer main and manhole plats and legal descriptions and the dedication documents.
 - **Outstanding:** Record drawings.
 - **Outstanding:** receipt of 15% Maintenance bond.
- Elizabeth Village Phase 1:
 - All of Phase 1 sewers are complete and ready for dedication, with the exception of one sanitary sewer run that were partially installed due to restrictions with the proposed grading. This run is

partially located within the newly constructed road and the portion of the sewer within the road was installed and then capped. GHD does not suggest dedicating partial sewer runs. This run will be completed and dedicated under Phase 2.

- **Outstanding:** Closeout of the HOP.
- **Outstanding:** Sewer main and manhole plats and legal descriptions need to be submitted and approved. The dedication documents need to be signed.
- **Outstanding:** Record drawings.
- **Outstanding:** receipt of 15% Maintenance bond.

GHD and LPT staff recommend the Board conditionally accept dedication of the four developer installed sanitary sewer extensions listed above and authorize staff to finalize the dedication after the outstanding items noted above are adequately addressed.

Regards



Melissa Tomich Smith, PE
Project Manager

January 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
			Dowhower Underdrain Storm Work			
5	6	7	8	9	10	11
	Dowhower Underdrain Storm Work					
12	13	14	15	16	17	18
	Berryhill Sewer Repair					
19	20	21	22	23	24	25
	Flank Dr Sewer Repair					
26	27	28	29	30	31	
	Flank Dr Sewer Repair					

February 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3 Flank Dr. Sewer Repair	*EMERGENCY REPAIR- Storm - Melbourn Dr.		Restoration work		8
9	10 Berkley St. External Repair	11	12 Collingswood External Repair	13	14	15
16	17 President's Day	Collingswood External Repair		20	21	22
23	24	25	26	27	28	
	PC-3E Lemar Dr. Storm Work					

March 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
	PC-3E Lemar Dr. Storm Work					
9	10	11	12	13	14	15
	PC-3E Santo Circle Storm Work					
16	17	18	19	20	21	22
	PC-3E Santo Circle Storm Work					
23	24	25	26	27	28	29
	Willow Rd. Storm Repairs for Paving Contract					
30	31					
	Storm Repair Old Union Deposit					

LOWER PAXTON TOWNSHIP AUTHORITY
Budget-Actual Comparison Reports -
Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account NumberAccount Title		2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+/(-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
OPERATING REVENUES:								
36-3001-341.01	Interest Earnings	\$ 1,189,109	\$ 850,000	\$ 339,109	140%	\$ 945,448	3782%	Anticipated decline in rates did not occur as swiftly as expected in budget, and invested balances were stable/improving most of the year.
36-3001-364.10	Sewer - Rent Charges	17,174,964	17,200,000	(25,036)	100%	17,347,788	108%	Overall revenues down by approx. 1% over prior year (no fee changes and limited growth), which included some adjustments for Q4 billing corrections after issuance; consistent with conservative budget mark.
36-3001-364.11	Sewer - Tapping Fees	277,105	300,000	(22,895)	92%	295,889	69%	Sluggish in early period, but rebounded late with settling inflation/interest rates to aid permits/construction.
36-3001-364.12	Sewer - Misc Reimbursements	70,402	94,584	(24,182)	74%	20,977	19%	Primarily for developer escrow reimbursements and shared service reimbursements from municipal partner groups (slightly less than anticipated, due to delays in CRW
36-3001-391.10	Proceeds - Sales of Fixed Assets	-	-	-	0%	540,987	0%	Prior year excess land sale, per Board approval.
36-3001-393.10	Proceeds - Debt Issuance - Operations	240,231	-	240,231	0%	946,769	0%	Represents final PennVest reimbursement draws.
TOTAL SEWER FUND REVENUES		18,951,811	18,444,584	507,227	103%	20,097,857	119%	
OPERATING EXPENDITURES:								
36-4400-429.300	Supp & Admin - Office Supplies	25,182	27,150	1,968	93%	30,247	80%	Reduced from prior year due to mid-2023 expenses shift for solid waste/recycling billing and collection operation implementation.
36-4400-429.306	Supp & Admin - IT Supplies	696	250	(446)	278%	1,839	0%	
36-4400-429.310	Supp & Admin - Bank Fees	5,118	8,905	3,787	57%	15,361	93%	Includes bond fees charged during year; continue fee-free auto-ACH services, and pass-through online charges.
36-4400-429.312	Supp & Admin - Advertising	2,106	1,000	(1,106)	211%	1,853	46%	Included project advertisement for PC-2E/2F bids.
36-4400-429.314	Supp & Admin - Postage	15,929	17,000	1,071	94%	14,895	62%	Consistent with budget, including recent USPS increases, but slightly down for consolidating delinquent reporting process.
36-4400-429.322	Supp & Admin - Training/Seminars	12,281	9,500	(2,781)	129%	12,253	111%	High for new-hire CDL training .
36-4400-429.500	Prof Svcs - Solicitor & Debt Collection	74,570	125,000	50,430	60%	110,908	61%	Limited delinquency and lien activity/assistance from Solicitor and Collection Agent in Q1/Q2, and change in collections process made in early Q3 removed most fees 2025/further; new Solicitor placed in October .
36-4400-429.510	Prof Svcs - Engineering Services	166,759	163,000	(3,759)	102%	148,967	110%	Spiked for increased CRW rate/contract support.
36-4400-429.512	Prof Svcs - CRW Rate Services	6,328	60,000	53,672	11%	2,491	0%	Includes support for rate study and database assessments, including CRW rates/contracts (to be partially offset with reimbursement revenue above from other municipal partners, as billed), which push to 2025 due to slow progress on negotiations.
36-4400-429.520	Prof Svcs - Accounting & Auditing	8,240	8,240	-	100%	8,360	76%	
36-4400-429.521	Prof Svcs - Contracted Labor	4,350	14,500	10,150	30%	787	0%	Temporary staff position, currently held vacant (evaluation ongoing for future full-time need or other staff changes).
36-4400-429.530	Prof Svcs - Township Management Admin Reimbursements	441,421	470,198	28,777	94%	2,521,865	83%	2024/further segregation below for field labor ; otherwise, comparable to prior year and consistent with budget in total.
36-4400-429.535	Prof Svcs - Township Admin Rents	34,432	44,350	9,918	78%	43,029	104%	2024/further segregation below for facilities program rents ; otherwise, comparable to prior year and consistent with budget in total.
36-4400-429.542	Prof Svcs - IT Subscriptions/Licenses	58,922	60,000	1,078	98%	52,237	177%	

LOWER PAXTON TOWNSHIP AUTHORITY
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36-4400-429.570	Prof Svcs - Copier Maintenance Contracts	4,040	5,750	1,710	70%	6,880	0%	Reduced from prior year/budget through newly negotiated contracts.
36-4400-429.598	Prof Svcs - Communications & Newsletter Services	8,770	9,240	470	95%	8,085	0%	Shared allocation for third-party communications management services (previously in Management Reimbursements above).
36-4400-429.670	Utilities - Telephone & Alarm	20,553	24,500	3,947	84%	23,817	74%	Reduced for review and modifications to service needs.
36-4400-486.730	Misc - Liability & Casualty Insurances	34,718	44,100	9,382	79%	49,795	128%	Reflects a number of reduced premium costs for specific coverage lines, and additional cost shift to stormwater due to labor divisions.
Administration - General Services Expenditures Subtotal		924,416	1,092,683	168,268	85%	3,053,669	84%	
36-4405-429.302	Supp & Admin - Building Supplies	3,480	8,000	4,520	43%	7,537	30%	Shift in reporting for facilities maintenance below.
36-4405-429.326	Supp & Admin - Uniforms	4,570	4,000	(570)	114%	9,915	117%	Estimate for union allowance use slightly low versus actual.
36-4405-429.352	Supp & Admin - Small Tools/Equipment	4,873	10,000	5,127	49%	7,336	293%	Shift in reporting for facilities maintenance below.
36-4405-429.400	R&M - Facilities Maintenance	9,091	-	(9,091)	0%	2,715	0%	Allocated share of door replacement, fire pit valve replacement, and other minor maintenance for sewer operations facility.
36-4405-429.402	R&M - Pump Station Maintenance	8,690	30,000	21,310	29%	23,709	79%	
36-4405-429.420	R&M - Vehicle Maintenance	18,444	15,000	(3,444)	123%	31,413	262%	High for several vehicle incidents, less insurance offsets.
36-4405-429.460	R&M - Sewer Line Maintenance	99,906	40,000	(59,906)	250%	49,444	0%	Approx. \$36,000 for Rogele emergency contract work (including Kalla Drive 20' broken pipe, and force main break repair at Colonial Road Pumping Station), and \$14,137 for stock manhole supplies for various jobs.
36-4405-429.530	Prof Svcs - Township Management Program Reimbursements	1,850,550	1,906,500	55,950	97%	-	0%	2024/further segregation of field labor from office labor.
36-4405-429.535	Prof Svcs - Township Program Rents	9,600	-	(9,600)	0%	-	0%	2024/further segregation of Public Works facilities rents/reimbursements.
36-4405-429.572	Prof Svcs - Cleaning Services	1,000	-	(1,000)	0%	-	0%	Cleaning services outsourced mid-2024 (reduced Township Program Reimbursements from prior part-time staff).
36-4405-429.579	Prof Svcs - Enterprise Vehicle Leases	97,328	60,000	(37,328)	162%	88,294	66%	Total Sewer/Stormwater lease charges in line (and less than) with budget; budget allocation incorrect.
36-4405-429.581	Prof Svcs - DEP/Related Fines	6,250	4,500	(1,750)	139%	3,000	50%	Multiple overflows due to significant January 9th weather event.
36-4405-429.582	Prof Svcs - PA One Call Services	38,557	40,000	1,443	96%	37,459	39%	
36-4405-429.588	Prof Svcs - PennDOT Expenses	794	2,000	1,207	40%	4,076	12%	
36-4405-429.600	Utilities - Vehicle Fuel	23,835	35,000	11,165	68%	28,519	89%	
36-4405-429.610	Utilities - Electric	3,521	4,000	479	88%	4,410	73%	
36-4405-429.612	Utilities - Electric - Pumps	17,412	25,000	7,588	70%	18,292	76%	
36-4405-429.620	Utilities - Natural Gas	2,372	4,800	2,428	49%	7,256	132%	Greatly reduced rate for 2025 contract, and credit applied from last year.
36-4405-429.630	Utilities - Water	5,338	5,200	(138)	103%	5,807	83%	
36-4405-429.632	Utilities - Water - Pumps	1,324	4,000	2,676	33%	1,639	33%	
36-4410-429.560	Prof Svcs - Swatara Transmission/Treatment	2,019,050	2,300,000	280,950	88%	1,769,322	137%	
36-4410-429.562	Prof Svcs - Swatara Flow Surcharges	22,453	30,000	7,547	75%	9,637	19%	Significant in Q1, due to January 9th weather event.
36-4410-429.564	Prof Svcs - CRW Transmission/Treatment	3,608,902	4,000,000	391,098	90%	4,163,992	116%	Reflects all billings and accruals based on Township-initiated payments (at 2023 rates), reduction for amounts held by CRW in excess of costs (as reserve), and increase for disputed amounts and 2023-2024 rate differential accrued for audit (roughly \$ 557,000)

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		Actual (thru 12/31/24)	Adopted Budget	+ / (-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
36-4410-429.566	Prof Svcs - Paxtang Transmission	9,788	14,000	4,213	70%	12,361	88%	
Sewer Operations & Transmission Expenditures Subtotal		7,867,127	8,542,000	674,874	92%	6,286,130	117%	
36-4700-471.800	Debt - Principal - Capital Leases	-	-	-	0%	17,788	0%	No current capital leases.
36-4700-471.817	Debt - Principal - 2014 Bonds	570,000	570,000	-	100%	550,000	108%	All bond principal paid in April.
36-4700-471.818	Debt - Principal - 2015 Bonds	1,845,000	1,845,000	-	100%	1,735,000	17350%	
36-4700-471.819	Debt - Principal - 2016 Bonds	590,000	590,000	-	100%	570,000	109%	
36-4700-471.820	Debt - Principal - 2019 PennVest Loan	579,156	622,500	43,344	93%	604,434	0%	Monthly payments.
36-4700-471.822	Debt - Principal - 2019 Bonds	210,000	210,000	-	100%	235,000	96%	
36-4700-471.823	Debt - Principal - 2020A Bonds	535,000	535,000	-	100%	520,000	103%	
36-4700-471.826	Debt - Principal - 2020C Bonds	335,000	335,000	-	100%	330,000	93%	
36-4700-471.827	Debt - Principal - 2022 Bonds	470,000	470,000	-	100%	455,000	0%	
36-4700-472.800	Debt - Interest - Capital Leases	-	-	-	0%	799	0%	No current capital leases.
36-4700-472.817	Debt - Interest - 2014 Bonds	66,035	66,035	-	100%	88,435	71%	All bonds interest paid semi-annually.
36-4700-472.818	Debt - Interest - 2015 Bonds	339,875	339,875	-	100%	411,475	92%	
36-4700-472.819	Debt - Interest - 2016 Bonds	337,281	337,281	-	100%	360,481	89%	
36-4700-472.820	Debt - Interest - 2019 PennVest Loan	172,629	160,000	(12,629)	108%	165,325	82%	Monthly payments.
36-4700-472.822	Debt - Interest - 2019 Bonds	1,513,650	1,513,650	-	100%	1,522,550	99%	
36-4700-472.823	Debt - Interest - 2020A Bonds	944,850	944,850	-	100%	955,400	98%	
36-4700-472.826	Debt - Interest - 2020C Bonds	762,759	762,758	(1)	100%	765,537	104%	
36-4700-472.827	Debt - Interest - 2022 Bonds	177,200	177,200	-	100%	193,425	0%	
36-4700-472.828	Debt - Interest - 2024 Bonds	415,083	437,575	22,492	95%	-	0%	
Debt Service Expenditures Subtotal		9,863,518	9,916,724	53,206	99%	9,480,650	110%	
TOTAL SEWER FUND OPERATING EXPENDITURES		18,655,061	19,551,407	896,346	95%	18,820,448	107%	
NET OPERATING CHANGE IN RESERVES		\$ 296,749	\$ (1,106,823)	\$ 1,403,572		\$ 1,277,409		
OPERATING CASH BALANCES (Estimated)		\$ 23,938,339				\$ 21,062,071		

CAPITAL REVENUES:								
36-3900-341.04	Interest Earnings - PLGIT Bonds	\$ 467,456	\$ 354,000	\$ 113,456	132%	\$ 367,899	244%	Includes protective estimate of arbitrage (excess) earnings on 2024 bond, pending March 2025 spending test (based on project progress, except to not meet the exception and thus have future rebate requirement).
36-3900-351.04	Federal - Sewer Grants	-	-	-	0%	-	0%	
36-3900-354.04	State - Sewer Grants	1,000,000	1,000,000	-	100%	-	0%	State grant towards PC-3 improvements project below, accrued (actual submission in Q1 2025).
36-3900-392.01	Transfers In - Township Capital Funds	545,991	-	545,991	0%	150,912	0%	Reflects year-end accruals for Township-awarded grants, passed through to Authority, for the Pc-3 project (construction, after CFA grant accounted for above).
36-3900-393.10	Proceeds - Debt Issuance - Capital	15,907,603	16,165,000	(257,397)	98%	-	0%	Budgeted for additional PennVest 2019 loan draws (above in Operations actual) and 2024 bond issuance.
TOTAL SEWER FUND CAPITAL REVENUES		17,921,050	17,519,000	402,050	102%	518,811	345%	
CAPITAL EXPENDITURES:								
36-4700-475.880	Debt - Issuance Costs	201,357	200,000	(1,357)	101%	-	0%	Costs associated with 2024 bond issuance; comparable with budget.

LOWER PAXTON TOWNSHIP AUTHORITY
Budget-Actual Comparison Reports -
Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account Number	Account Title	2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+ / (-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
36-4800-429.940	Capital - Paxton Creek Act 537 Improvements	-	500,000	500,000	0%	-	0%	Paxton Creek North Branch Susquehanna Project bid early 2023 (Susquehanna to bill Township respective project cost share, anticipated in 2025 at \$700,000).
36-4800-429.941	Capital - Beaver Creek Act 537 Improvements	1,115,640	-	(1,115,640)	0%	-	0%	\$1.1 million change order and engineer-estimated contingency for completion of Swatara Authority Dryer Project for Township capacity share of costs.
36-4900-429.910	Capital - Equipment Purchases	72,289	67,500	(4,789)	107%	41,124	5%	Cost share for mobile inspection system (portable TV camera) and additional message board for construction sites (unbudgeted).
36-4900-429.920	Capital - Facilities Improvements	29,920	40,000	10,080	75%	-	0%	Allocated share of completed HVAC improvements at Sewer Operations facility.
36-4900-429.940	Capital - Engineering GIS	6,527	75,000	68,473	9%	342	3%	Staff and intern GIS support greatly expanded, reducing need for engineer support.
36-4900-429.941	Capital - Engineering Data Analysis	110,035	80,000	(30,035)	138%	106,732	91%	Includes meter site tool/subscription costs.
36-4900-429.942	Capital - Enigneering Meetings & Reporting	39,664	30,000	(9,664)	132%	30,482	85%	
36-4900-429.943	Capital - Mainline Repairs	347,937	275,000	(72,937)	127%	148,731	57%	Estimated annual maintenance and main line sewer repairs necessary in system, with minor engineering support; <i>spike in Q4 for sewer portion of Township 2024 paving project work (\$228,000), modestly higher than budget expectation</i> .
36-4900-429.944	Capital - Metering	32,234	45,000	12,766	72%	55,576	65%	Metering data, maintenance, and replacement costs relative to sewer flow monitoring.
36-4900-429.951	Capital - PC-2 Sewer Improvements	153,414	2,275,000	2,121,586	7%	36,194	0%	Anticipated \$1,900,000 construction, \$50,000 engineering, and \$250,000 for lateral repairs/related costs; <i>majority shifting to 2025 due to late 2024 contract start</i> .
36-4900-429.952	Capital - PC-3 Sewer Improvements	2,175,539	5,225,000	3,049,461	42%	403,852	0%	Continuation of PC-3E project, with 50% construction budgeted in 2024 (\$5,165,000 construction and \$60,000 engineering); <i>majority shifting to 2025</i> .
36-4900-429.961	Capital - BC-2/5 Sewer Improvements	2,232	-	(2,232)	0%	126,707	1%	BC-2A/B/C and BC-5B sewer improvement projects completed early 2023.
36-4900-429.966	Capital - BC-7 Sewer Improvements	3,281,838	4,170,400	888,562	79%	10,202,727	2915%	Beaver Creek BC-7 Project started in July 2022 (delayed), with significant construction in 2023/2024, with completion early 2025 (\$4,000,400 construction and \$170,000 engineering); <i>minor completion costs in 2025</i> .
36-4900-429.971	Capital - SC-2 Sewer Improvements	-	-	-	0%	174,876	8%	
36-4900-429.981	Capital - Red Top Rd Bridge Sewer	-	-	-	0%	158,854	0%	Final close-out billing for sewer relocation costs and allocated project engineering, mostly matched with grant funding (above).
36-4900-429.530	Prof Svcs - Sewer PW Capital Management Reimbursements	7,492	-	(7,492)	0%	-	0%	Share of Public Works wages/benefits relative to paving support for various Mainline Repairs projects (above).
TOTAL SEWER FUND CAPITAL EXPENDITURES		\$ 7,576,118	\$ 12,982,900	\$ 5,406,782	58%	\$ 11,486,197	64%	
NET CAPITAL CHANGE IN RESERVES		\$ 10,344,931	\$ 4,536,100	\$ (5,004,732)		\$ (11,430,620)		
CAPITAL CASH BALANCES (Estimated)		\$ 11,862,482				\$ 2,881,693		
TOTAL SEWER FUND EXPENDITURES		\$ 26,231,180	\$ 32,534,307	\$ 6,303,127	81%	\$ 30,306,645	85%	
NET TOTAL SEWER FUND CHANGE IN RESERVES		\$ 10,641,681	\$ 3,429,277	\$ 7,212,404		\$ (9,689,977)		
OPERATING & CAPITAL CASH BALANCES (Estimated)		\$ 35,800,822				\$ 23,943,765		

ENGINEER'S REPORT

20 February 2025

Title	Engineer's Report for the Lower Paxton Township Authority		
Copy to	Lower Paxton Township Authority		
From	Melissa Tomich Smith, PE	Tel	717-541-0622
Subject	Engineer's Report for Active Projects	Project no.	1257258

The following is a summary of GHD's activities since the November 21st meeting.

1. Chapter 94 Report

GHD is preparing the 2024 Chapter 94 Reports to CRW and Swatara and will submit them to the contributing municipalities by early March.

2. DEP Consent Order

As outlined in the last engineering's report, DEP agrees with the overall success of the program and is open to evaluating a new path to the CAP completion using an agreed upon design storm.

2.1 Modeling

GHD is updating the Beaver Creek model to reflect a storm event based hydraulic model to seek DEP approval for identifying a storm for design criteria. The remaining projects required to meet the CAP requirements, may be based on this return storm event. GHD is also updating the Spring Creek model and evaluating any areas at risk of overflows and the effects of the increased storm events on the system in this basin.

As previously reported to DEP, LPT has completed projects in 37 mini-basins using the "total replacement" approach and replaced/upgraded several trunk lines and interceptors in the three drainage basins to increase conveyance capacity and assist in reducing the hydraulic overload. LPT has seen great success with the modified approach which includes the following:

- Averaged over 90% excess I/I removal
- Reached 100% removal rates on some projects
- Removed over 40 mgd of peak hourly I/I from the sanitary sewer system

Due to the success of the overall program GHD is evaluating the list of manholes that Township Staff check during rain events for overflows throughout the Township as many can be removed from the list as there is no longer threats of overflows due to the substantial amount of peak flow I/I that has been removed from the system.

3. Wet Weather Summary

The wet weather events (WWEs) in October, November, and December of 2024 are presented in the following table. There was one (1) extreme, three (3) significant, and three (3) minor WWEs. There were no overflows reported during this metering period and no IMA limits were exceeded.

Wet Weather Event Summary Table							
Date	Rainfall (in.) ⁽¹⁾	MH 2790 Control Basin Peak (mgd) ⁽²⁾	Pre-Groundwater (ft)	Post-Groundwater (ft)	Storm Category	Weather Summary & Notes	Overflows
10/01/24	0.5	0.36	444.5	444.5	Significant	Combined rainfall 09/29/24-10/03/24	No
11/10/24	0.3	0.32	444.3	444.4	Significant	-	No
11/22/24	0.4	0.25	444.3	444.4	Minor	-	No
11/26/24	0.3	0.13	443.4	444.2	Minor	-	No
11/28/24	0.6	0.37	444.4	444.5	Significant	-	No
12/11/24	1.6	0.86	444.4	444.7	Extreme	Combined rainfall 12/10/24-12/11/24	No
12/29/24	0.5	0.26	443.7	444.5	Minor	Combined rainfall 12/27/24-12/29/24	No

(1) Rainfall data from Koons Park Rain Gauge (RG 753).

(2) Control basin flow reduced by a correction factor of 0.13 mgd to account for growth in the basin @ 850 gpd/EDU.

4. CRW Intermunicipal Agreement

GHD, LPT Staff, CDM Smith, and CRW CEO, CFO will meet on February 20th to discuss the approach and next steps forward. These include:

1. Target for completion by June 2025.
2. Consultants work together to develop multiple approaches to cost allocation and then present them to the group. A few of the cost allocation items discussed and to be included are:
 - a. Use of sewer metered flow (Maximum month and average month) to allocate volume and demand capital costs, respectively.
 - b. Use of metered water use to verify flows by each municipality.
 - c. Top-down and bottom-up approach to allocation: allocate total flows at the wastewater plant to each municipality and build up to total flows.
3. Completion of a limited cost of service study and wholesale rates development.
4. Allocate a limited cost of service / rate study will result in separate rates for each of the municipals as if they were separate rate classes and the balance of CRW customers, the retail sector, will be treated as one customer class.
5. Development on memorandum of understanding.

The next meeting with the Special Counsel and Team Meeting with CRW is scheduled for February 27th.

5. Construction Projects

5.1 BC-7A/7B/7C/7D/8C/8D

The sanitary sewer work was substantially complete as of July 9th. During this period, the contractor was completing temporary and final paving, ADA ramp installations, curb and sidewalk replacement. The remaining storm sewer work was still delayed due to utility conflicts not yet being addressed by PPL. PPL did respond on February 17th and said they could have their work completed within 5-7 weeks.

GHD is currently reviewing applications for payment and currently preparing a CO for the time extension to complete the project.

5.2 PC-2E Trunkline Project

PACT One started work on the replacement project on January 20th. Approximately 25% of the project is completed. The utility conflicts on Blue Mountain Road have been completed ahead of the storm sewer replacement work. The proposed road closure for Blue Mountain Parkway is scheduled for March 5th – 7th.

GHD is currently reviewing applications for payment and misc. construction engineering services.

5.3 Misc. External Mainline Repairs

The Misc. External Mainline Repairs were bid with the PC-2E Trunkline Project and awarded to PACT One, LLC. These repairs will be completed after the PC-2E Trunkline is installed.

6. Properties with On-Lot Systems

6.1 Wilshire Road Request for Sanitary Sewer Extension

The Authority had received requests from a few of these property owners who are interested in connecting to the public sanitary sewer system. Due to the layout of the sanitary sewers serving Wilshire Estates, and their utilization of low-pressure sewers for a portion of the development, there is no gravity sanitary sewer available to connect the dry sewer into. The Authority authorized GHD to prepare two options to connect these homes to the public sanitary sewer system, prepare cost estimates for each option, and to calculate an estimated front foot assessment and total cost to connect for each property. GHD prepared this information and presented the chosen option, a low-pressure sewer system with individual grinder pumps, to the property owners on January 29th. A memo summarizing the meeting and the suggested follow-up is attached.

7. Emergency Repairs to the Wastewater and Stormwater Collection System

No Work Orders were issued this period. Three work orders have been issued to Rogele to date under the current contract. Work Order number 1 was to repair 20 LF of broken pipe on Kalla Drive, Work Order number 2 was to repair a force main break at the Colonial Road pumping station and Work Order number 3 was to repair a collapsed pipe located on Stradford Drive that consisted of replacing approximately 10 LF of sewer main.

8. PennDOT Projects

8.1 Locust Lane (MPMS #108527)

The time extension to the Locust Lane HOP was approved by PennDOT. Township staff will raise the manhole frame and covers in the summer of 2025 before the PennDOT paving project is completed in the fall of 2025.

8.2 Nyes Road Bridge Replacement (MPMS #117189)

GHD attended a meeting with PennDOT on January 30th. PennDOT will be replacing the bridge on Nyes Road north of its intersection with Pin Hill Road. Township staff will provide risers for two manholes that will need to be adjusted and will televise the adjacent sanitary sewer main before and after construction to ensure that the construction did not compromise the structural integrity of the pipe.

8.3 Union Deposit Road ADA Ramp Project (MPMS #119307)

GHD responded to PennDOT's request for utility conflicts with the proposed ADA Ramp project along Union Deposit from its intersection with I-83 to Lakewood Drive. There are no conflicts with the sanitary sewer system.

9. Standard Specifications and Rules Rates and Regulations

GHD has prepared a draft update to the Standard Construction and Material Specifications for Wastewater Collection System Extension that were last updated in May 2017. Staff is currently reviewing the draft documents.

GHD is also preparing a Sewer System Rules, Rates and Regulations document for the Authority's review and adoption.

10. Developments

A memo regarding the four developments, or phases of developments, that have sanitary sewers ready for dedication is attached.

GHD's activities since the November 21st meeting:

- Elizabeth Village, Phase 1: Construction is complete, and the project is currently being closed out. Developer is requesting sewers to be dedicated.
- Whilshire Phase 2C: Construction is complete, and the project is currently being closed out. Developer is requesting sewers to be dedicated.
- Nissley Property: Construction is complete, and the project is currently being closed out. Developer is requesting sewers to be dedicated.
- Wingstop (4919 Jonestown Rd): DEP planning has been approved and a sewer permit has been approved. Submittals for grinder pump and grease interceptor are under review.
- Parkway Farms, Phase 2: Construction is complete, and the project is currently being closed out. Developer is requesting sewers to be dedicated.
- Cider Press: Construction is scheduled to start in early March.
- Harrisburg Temple (605 Rutherford Road): GHD returned the drawing review letter on January 1, 2025, and reviewed the planning application and returned a review letter on December 12, 2024.

January 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
			1	2	3	4
			Dowhower Underdrain Storm Work			
5	6	7	8	9	10	11
	Dowhower Underdrain Storm Work					
12	13	14	15	16	17	18
	Berryhill Sewer Repair					
19	20	21	22	23	24	25
	Flank Dr Sewer Repair					
26	27	28	29	30	31	
	Flank Dr Sewer Repair					

February 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3 Flank Dr. Sewer Repair	*EMERGENCY REPAIR- Storm - Melbourn Dr.		Restoration work		8
9	10 Berkley St. External Repair	11	12 Collingswood External Repair	13	14	15
16	17 President's Day	Collingswood External Repair		20	21	22
23	24	25	26	27	28	
	PC-3E Lemar Dr. Storm Work					

March 2025

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
						1
2	3	4	5	6	7	8
	PC-3E Lemar Dr. Storm Work					
9	10	11	12	13	14	15
	PC-3E Santo Circle Storm Work					
16	17	18	19	20	21	22
	PC-3E Santo Circle Storm Work					
23	24	25	26	27	28	29
	Willow Rd. Storm Repairs for Paving Contract					
30	31					
	Storm Repair Old Union Deposit					



Pennsylvania
**Department of
Environmental Protection**

February 21, 2025
VIA ELECTRONIC MAIL

Larry Stepansky
Lower Paxton Township Dauphin County
425 Prince Street
Harrisburg, PA 17109-3054
lstepansky@lowerpaxton-pa.gov

Re: Draft NPDES Permit- MS4
Lower Paxton Township Dauphin County MS4
Application No. PAI133540
Authorization ID No. 1514604
Lower Paxton Township, Dauphin County

Dear Permittee:

The Department of Environmental Protection (DEP) has prepared the enclosed draft NPDES permit for your review and comment.

Also enclosed is a copy of a public notice that, in accordance with DEP regulations at 25 Pa. Code § 92a.82(b), you are required to post near the entrance to your premises and, if the facility or discharge location is remote from these premises, at the entrance to the facility or at the discharge location. These postings shall remain for 30 days.

DEP will publish notice of the draft permit in the Pennsylvania Bulletin in the near future. You may provide written comments on the draft permit up to 30 days following publication of this notice. Following the 30-day public comment period (which may be extended by 15 days at DEP's discretion), DEP will consider any comments received and make a decision on whether to issue a final permit.

If you have any questions, please contact me at 717.705.4918 or jrakowsky@pa.gov.

Sincerely,

Jacob S. Rakowsky

Jacob S. Rakowsky, E.I.T.
Project Manager
Clean Water Program

Mr. Larry Stepansky

- 2 -

Enclosures

cc: Anderson Deutschman, Herbert Rowland & Grubic Inc.
adeutschman@hrg-inc.com



**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 INDIVIDUAL PERMIT TO DISCHARGE STORMWATER FROM
 SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s)**

NPDES PERMIT NO. PAI133540

In compliance with the provisions of the Clean Water Act, 33 U.S.C. Section 1251 et seq. ("the Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 et seq.,

**Lower Paxton Township Dauphin County
 425 Prince Street
 Harrisburg, PA 17109-3054**

is authorized to discharge from a regulated small municipal separate storm sewer system (MS4) located in **Lower Paxton Township, Dauphin County** to **Nyes Run (WWF, MF), Slotznick Run (CWF, MF), Unnamed Tributary of Paxton Creek (WWF, MF), Paxton Creek (WWF, MF), Unnamed Tributary to Paxton Creek (WWF, MF), Asylum Run (WWF, MF), Beaver Creek (WWF, MF), Spring Creek (CWF, MF), and Unnamed Tributary to Beaver Creek (WWF, MF)** in Watershed(s) **7-D and 7-C** in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

THIS PERMIT SHALL BECOME EFFECTIVE ON _____

THIS PERMIT SHALL EXPIRE AT MIDNIGHT ON _____

The authority granted by coverage under this Permit is subject to the following further qualifications:

1. The permittee shall comply with the effluent limitations and reporting requirements contained in this permit.
2. The application and its supporting documents are incorporated into this permit. If there is a conflict between the application, its supporting documents and/or amendments and the terms and conditions of this permit, the terms and conditions shall apply.
3. Failure to comply with the terms, conditions or effluent limitations of this permit is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (40 CFR 122.41(a))
4. A complete application for renewal of this permit, or notice of intent to cease discharging by the expiration date, must be submitted to DEP at least 180 days prior to the above expiration date (unless permission has been granted by DEP for submission at a later date), using the appropriate NPDES permit application form (40 CFR 122.41(b), 122.21(d)). In the event that a timely and complete application for renewal has been submitted and DEP is unable, through no fault of the permittee, to reissue the permit before the above expiration date, the terms and conditions of this permit, including submission of the Annual MS4 Status Reports, will be automatically continued and will remain fully effective and enforceable against the discharger until DEP takes final action on the pending permit application. (25 Pa. Code §§ 92a.7(b), (c))

DATE PERMIT ISSUED _____

ISSUED BY _____

**Maria D. Bebenek, P.E.
 Environmental Program Manager
 Southcentral Regional Office**

PART A

EFFLUENT LIMITATIONS, REPORTING AND RECORDKEEPING REQUIREMENTS

I. EFFLUENT LIMITATIONS

- A. This permit establishes effluent limitations in the form of implementation of a Stormwater Management Program (SWMP), as specified in Part C I of this permit, to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable. The permittee shall comply with Minimum Control Measures (MCMs) and best management practices (BMPs) in Part C I of this permit, which constitutes compliance with the standard of reducing pollutants to the maximum extent practicable.
- B. All discharges from regulated small MS4s must comply with all applicable requirements established in accordance with 25 Pa. Code Chapters 91-96, 102, and 105 of DEP's rules and regulations. DEP may, upon written notice, require additional BMPs or other control measures to ensure that the water quality standards of the surface waters receiving stormwater discharges are attained.

II. DEFINITIONS

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce pollutant loading to surface waters of this Commonwealth. The term includes treatment requirements, operating procedures and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. The term includes activities, facilities, measures, planning or procedures used to minimize accelerated erosion and sedimentation and manage stormwater to protect, maintain, reclaim and restore the quality of waters and the existing and designated uses of waters within this Commonwealth before, during and after earth disturbance activities. (25 Pa. Code § 92a.2)

Clean Water Act (CWA) means the Federal Water Pollution Control Act, as amended, 33 U.S.C.A. §§ 1251 - 1387.

Cleaning Agent means any product, substance or chemical other than water that is used to clean the exterior surface of vehicles.

Designated Uses are those uses specified in 25 Pa. Code §§ 93.4(a) and 93.9a – 93.9z for each water body or segment whether or not they are being attained. (25 Pa. Code § 93.1)

Dry Weather means a condition in which there are no precipitation, snowmelt, drainage or other events producing a stormwater discharge for more than 48 consecutive hours.

Existing Permittee means any entity that has been designated as a regulated small MS4 and has previously obtained permit coverage under the PAG-13 Permit or obtained an Individual NPDES MS4 Permit.

Existing Uses are those uses actually attained in the water body on or after November 28, 1975, whether or not they are included in the water quality standards. (25 Pa. Code § 93.1)

Illicit Connection means any physical connection to a municipal separate storm sewer system that can convey illicit discharges into the system and/or is not authorized or permitted by the permittee.

Illicit Discharge means any discharge to a municipal separate storm sewer that is not composed entirely of stormwater, except non-stormwater discharges as described in the "Discharges Authorized by this Permit" section of this Permit. Examples of illicit discharges include dumping of motor vehicle fluids, household hazardous wastes, grass clippings, leaf litter, animal wastes, or unauthorized discharges of sewage, industrial waste, restaurant wastes, or any other non-stormwater waste into a municipal separate storm sewer system. Illicit discharges can be accidental or intentional.

Impaired Waters means surface waters that fail to attain one or more of its designated uses under 25 Pa. Code Chapter 93 and as listed in Categories 4 and 5 of Pennsylvania's Integrated Water Quality Monitoring and Assessment Report.

Integrated Water Quality Monitoring and Assessment Report means the report published every other year by DEP to report on the conditions of Pennsylvania's surface waters to satisfy sections 305(b) and 303(d) of the CWA.

Intermittent Stream means a body of water flowing in a channel or bed composed primarily of substrates associated with flowing water, which, during periods of the year, is below the local water table and obtains its flow from both surface runoff and groundwater discharges. (25 Pa. Code § 92a.2)

Load Allocation means the portion of a surface water's loading capacity that is assigned or allocated to existing and future nonpoint sources and natural quality. (25 Pa. Code § 96.1)

Low Impact Development (LID) means site design approaches and small-scale stormwater management practices that promote the use of natural systems for infiltration, evapotranspiration, and reuse of rainwater. LID can be applied to new development, urban retrofits, and revitalization projects. LID utilizes design techniques that infiltrate, filter, evaporate, and store runoff close to its source. Rather than rely on costly large-scale conveyance and treatment systems, LID addresses stormwater through a variety of small, cost-effective landscape features located on-site.

Municipal separate storm sewer means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains): (i) Owned or operated by a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to surface waters; (ii) Designed or used for collecting or conveying stormwater; (iii) Which is not a combined sewer; and (iv) Which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(8))

Municipal Separate Storm Sewer System (MS4) means all separate storm sewers that are defined as "large" or "medium" or "small" municipal separate storm sewer systems pursuant to 40 CFR §§ 122.26(b)(4), (b)(7), and (b)(16), respectively, or designated under 40 CFR § 122.26(a)(1)(v). (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(18))

Municipality means a city, town, borough, county, township, school district, institution, authority or other public body created by or pursuant to State law and having jurisdiction over disposal of sewage, industrial wastes or other wastes. (25 Pa. Code § 92a.2)

New Permittee means any entity that has been designated as a regulated small MS4 and has not previously obtained permit coverage under the PAG-13 General Permit or obtained an Individual NPDES MS4 Permit.

Non-Municipal Permittee means a regulated small MS4 that is not a municipality, e.g., military bases, large hospital or prison complexes, and highways and other thoroughfares.

Non-Structural BMPs means actions that involve management and source controls such as: (1) policies and ordinances that provide requirements and standards to direct growth to identified areas, promote redevelopment, protect areas such as wetlands and riparian areas, maintain and/or increase open space, provide buffers along water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; (2) education programs for developers and the public about minimizing water quality impacts; (3) measures such as minimizing the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, street sweeping, and source control measures such as good housekeeping, maintenance, and spill prevention; and other BMPs as referenced in Chapter 5 of the Pennsylvania Stormwater BMP Manual (363-0300-002).

Observation point means a location upstream of an outfall where a permittee must conduct dry weather screening in accordance with Part C I.B.3.d of this permit if the permittee determines that screening at an outfall is infeasible, and the point at which stormwater discharges to storm sewers owned or operated by an adjoining municipality where dry weather screening must be conducted.

Ordinance means a law enacted by the government of a municipality.

Outfall means a point source as defined by 40 CFR § 122.2 at the point where a municipal separate storm sewer discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(9))

Owner or Operator means the owner or operator of any “facility” or “activity” subject to regulation under the NPDES program. (25 Pa. Code § 92a.3(b)(1) and 40 CFR § 122.2)

Permittee means the owner or operator of a regulated small MS4 authorized to discharge under the terms of this permit.

Point Source means a discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, Concentrated Aquatic Animal Production Facility (CAAP), Concentrated Animal Feeding Operation (CAFO), landfill leachate collection system, or vessel or other floating craft from which pollutants are or may be discharged. (25 Pa. Code § 92a.2)

Pollutant means any contaminant or other alteration of the physical, chemical, biological, or radiological integrity of surface water which causes or has the potential to cause pollution as defined in section 1 of the Pennsylvania Clean Streams Law, 35 P.S. § 691.1. (25 Pa. Code § 92a.2)

Qualifying Development or Redevelopment Project means an earth disturbance activity that requires an NPDES permit for stormwater discharges associated with construction activity per 25 Pa. Code Chapter 102.

Regulated Small MS4 means any small MS4 that is covered by the federal Phase II stormwater program, either through automatic nationwide designation under 40 CFR § 122.32(a)(1) (via the Urbanized Area criteria) or by designation on a case-by-case basis by DEP pursuant to 40 CFR § 122.32(a)(2). “Regulated small MS4s” are a subset of “small MS4s” as defined in this section.

Riparian Forest Buffer means an area of permanent vegetation consisting of native trees, shrubs, forbs and grasses along surface water that is maintained in a natural state or sustainably managed to protect and enhance water quality, stabilize stream channels and banks, and buffer land use activities from surface waters.

Small Municipal Separate Storm Sewer System (Small MS4) means an MS4, as defined in this section, that is not a large or medium MS4 pursuant to 40 CFR §§ 122.26(b)(4) and 122.26(b)(7). The term small MS4 includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(16))

Standard Operating Procedure (SOP) means a policy or set of procedures that are enacted by a non-municipal permittee to implement a stormwater management program.

Storm Sewershed means the land area that drains to an individual MS4 outfall from within the jurisdiction of the MS4 permittee. The term “combined storm sewershed” means the drainage areas of all MS4 outfalls that discharge to a specific surface water or to waters within the Chesapeake Bay watershed.

Stormwater means runoff from precipitation, snow melt runoff and surface runoff and drainage. “Stormwater” has the same meaning as “storm water.” (25 Pa. Code § 92a.2)

Structural BMPs means stormwater storage and management practices including, but not limited to, wet ponds and extended detention outlet structures; filtration practices such as grassed swales, sand filters and filter strips; infiltration practices such as infiltration basins and infiltration trenches; and other BMPs as referenced in Chapter 6 of the Pennsylvania Stormwater BMP Manual (363-0300-002).

Surface Waters means perennial and intermittent streams, rivers, lakes, reservoirs, ponds, wetlands, springs, natural seeps and estuaries, excluding water at facilities approved for wastewater treatment such as wastewater treatment impoundments, cooling water ponds and constructed wetlands used as part of a wastewater treatment process. (25 Pa. Code § 92a.2)

Total Maximum Daily Load (TMDL) means the sum of individual waste load allocations for point sources, load allocations for nonpoint sources and natural quality and a margin of safety expressed in terms of mass per time, toxicity or other appropriate measures. (25 Pa. Code § 96.1)

Urbanized Area (UA) means land area comprising one or more places (central place(s)) and the adjacent densely settled surrounding area (urban fringe) that together have a residential population of at least 50,000 and an overall population density of at least 1,000 people per square mile, as defined by the United States Bureau of the Census and as determined by the latest available decennial census. The UA outlines the extent of automatically regulated areas.

Wasteload Allocation (WLA) means the portion of a surface water's loading capacity that is allocated to existing and future point source discharges. (25 Pa. Code § 96.1)

Water Quality Criteria means numeric concentrations, levels or surface water conditions that need to be maintained or attained to protect existing and designated uses. (25 Pa. Code § 93.1)

Water Quality Standards means the combination of water uses to be protected and the water quality criteria necessary to protect those uses. (25 Pa. Code § 92a.2)

III. MONITORING, REPORTING AND RECORDKEEPING

A. Where samples are collected and analyzed or measurements are taken under this permit, the permittee shall assure:

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(1))
2. Records of monitoring information shall include (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(3)):
 - a. The date, exact place, and time of sampling or measurements.
 - b. The individual(s) who performed the sampling or measurements.
 - c. The date(s) analyses were performed.
 - d. The individual(s) who performed the analyses.
 - e. The analytical techniques or methods used.
 - f. The results of such analysis.
3. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless another method is required under 40 CFR Subchapters N or O. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(j)(4))

B. Records Retention – All records of monitoring activities and results, copies of all plans and reports required by this Permit, and records of all data used to complete the application for this Permit shall be retained by the permittee for at least 5 years from the date of the sample measurement, report or application. Such records must be submitted to DEP upon request or as required for annual reports. The permittee must make records available to the public at reasonable times during regular business hours. (25 Pa. Code § 92a.3(c), 40 CFR §§ 122.34(g)(2) and 122.41(j)(2))

C. Proper Operation and Maintenance (O&M) – The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances), including stormwater BMPs, that are installed or used by the permittee to achieve compliance with the conditions of this permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(e))

D. Reporting and Fee Requirements

1. The permittee shall submit a complete Annual MS4 Status Report using DEP's annual report template (3800-FM-BCW0491) to the DEP regional office that issued Permit coverage approval by September 30 of each year.
 - a. For existing permittees, the first annual report submitted to DEP under this permit shall have a reporting period starting from the end of the latest annual or progress report period (under the

previous permit) to June 30, (Enter Year - One Full Year After Issuance). The first annual report is due by September 30, (Enter Year - One Full Year After Issuance). For new permittees, the first annual report is due by September 30 following the first year of Permit coverage.

- b. Following the first annual report, the reporting period shall thereafter be July 1 - June 30, and the report shall be due by September 30.
2. Permittees shall pay an annual fee of \$2,500 in accordance with 25 Pa. Code § 92a.62. Annual fees are due on each anniversary of the effective date of the most recent new or reissued permit issued prior to August 28, 2021. Payment for annual fees shall be remitted to DEP at the address below by the anniversary date. Checks should be made payable to the Commonwealth of Pennsylvania.

PA Department of Environmental Protection
Bureau of Clean Water
Re: Chapter 92a Annual Fee
PO Box 8466
Harrisburg, PA 17105-8466

3. The permittee shall submit the Annual MS4 Status Report and annual fee to DEP electronically upon receipt of written notification from DEP.
4. Unanticipated Non-Compliance or Potential Pollution Reporting
 - a. Immediate Reporting - The permittee shall immediately report any incident causing or threatening pollution in accordance with the requirements of 25 Pa. Code §§ 91.33 and 92a.41(b) listed below:
 - (i) If, because of an accident, other activity or incident a toxic substance or another substance which would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, the permittee shall immediately notify DEP by telephone of the location and nature of the danger. Oral notification to the Department is required as soon as possible, but no later than 4 hours after the permittee becomes aware of the incident causing or threatening pollution.
 - (ii) If reasonably possible to do so, the permittee shall immediately notify downstream users of the waters of the Commonwealth to which the substance was discharged. Such notice shall include the location and nature of the danger.
 - (iii) The permittee shall immediately take or cause to be taken steps necessary to prevent injury to property and downstream users of the waters from pollution or a danger of pollution and, in addition, within 15 days from the incident, shall remove the residual substances contained thereon or therein from the ground and from the affected waters of this Commonwealth to the extent required by applicable law.
 - b. The permittee shall report any non-compliance which may endanger health or the environment in accordance with the requirements of 40 CFR § 122.41(l)(6). These requirements include the following obligations:
 - (i) 24 Hour Reporting - The permittee shall orally report any non-compliance with this permit which may endanger health or the environment within 24 hours from the time the permittee becomes aware of the circumstances.
 - (ii) Written Report - A written submission shall also be provided within 5 days of the time the permittee becomes aware of any non-compliance which may endanger health or the environment. The written submission shall contain a description of the non-compliance and its cause; the period of non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance.
 - (iii) Waiver of Written Report - DEP may waive the written report on a case-by-case basis if the associated oral report has been received within 24 hours from the time the permittee becomes

aware of the circumstances which may endanger health or the environment. Unless such a waiver is expressly granted by DEP, the permittee shall submit a written report in accordance with this paragraph. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(6)(iii))

5. Other Non-Compliance

The permittee shall report all instances of non-compliance not reported under paragraph D.4 of this section at the time Annual Reports are submitted, on the Non-Compliance Reporting Form (3800-FM-BPNPSM0440). The reports shall contain the information listed in paragraph D.4.b.(ii) of this section. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(7))

6. Signatory Requirements

- a. Completed Annual Reports and all other reports, applications, and information submitted to DEP shall be signed and certified by either of the following applicable persons, as defined in 25 Pa. Code § 92a.22:
 - For a corporation - by a principal executive officer of at least the level of vice president, or an authorized representative, if the representative is responsible for the overall operation of the facility from which the discharge described in the NPDES form originates.
 - For a partnership or sole proprietorship - by a general partner or the proprietor, respectively.
 - For a municipality, state, federal or other public agency - by a principal executive officer or ranking elected official.
- b. If signed by a person other than the above, the person must be a duly authorized representative of the permittee. A person is a duly authorized representative only if:
 - The authorization is made in writing by a person described in paragraph a., above, and submitted to DEP.
 - The authorization specifies either an individual or a position having responsibility for the operation of the regulated system, facility or activity, such as the position of manager, operator, superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or any individual occupying a named position.
- c. Changes in Signatory Authorization - If an authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the system or facility, a new authorization satisfying the requirements of paragraphs 6.a and 6.b, above, must be submitted to DEP prior to or together with any reports, information or NOI to be signed by an authorized representative.

PART B

STANDARD CONDITIONS

I. MANAGEMENT REQUIREMENTS

A. Compliance

The permittee must comply with all conditions of this Permit. Any permit non-compliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(a))

B. Permit Modification, Termination, or Revocation and Reissuance

1. Permit coverage may be modified, terminated, or revoked and reissued during its term in accordance with Title 25 Pa. Code §§ 92a.72 and 92a.74 and 40 CFR § 122.41(f).
2. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated non-compliance, does not stay any Permit condition. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(f))

C. Duty to Provide Information

1. The permittee shall furnish to DEP, within a reasonable time, any information which DEP may request to determine whether cause exists for modifying, revoking and reissuing, or terminating coverage under this Permit, or to determine compliance with this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(h))
2. The permittee shall furnish to DEP, upon request, copies of records required to be kept by this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(h))
3. Other Information - Where the permittee becomes aware that it failed to submit any relevant facts in an NOI, or submitted incorrect information in an NOI or in any report to DEP, it shall promptly submit the correct and complete facts or information. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l)(8))
4. The permittee shall give advance notice to the DEP office that approved permit coverage of any planned physical alterations or additions to the regulated small MS4. Notice is only required when: 1) the alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR § 122.29(b), or 2) the alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(l))

D. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit that has a reasonable likelihood of adversely affecting human health or the environment. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(d))

E. Termination of Permit Coverage (25 Pa. Code § 92a.74 and 40 CFR 122.64)

1. Notice of Termination (NOT) – If the permittee plans to cease operations or will otherwise no longer require coverage under this permit, the permittee shall submit DEP's NPDES Notice of Termination (NOT) for Permits Issued Under Chapter 92a (3800-BCW-0410), signed in accordance with Part A III.D.6 of this permit, at least 30 days prior to cessation of operations or the date by which coverage is no longer required.
2. Where the permittee plans to cease operations, NOTs must be accompanied with an operation closure plan that identifies how tankage and equipment will be decommissioned and how pollutants will be managed, as applicable.

3. The permittee shall submit the NOT to the DEP regional office with jurisdiction over the county in which the facility is located.

II. PENALTIES AND LIABILITY

A. Violations of Permit Conditions

1. Any person violating Sections 301, 302, 306, 307, 308, 318 or 405 of the CWA or any permit condition or limitation implementing such sections in a permit issued under Section 402 of the Act is subject to civil, administrative and/or criminal penalties as set forth in 40 CFR § 122.41(a)(2).
2. Any person or municipality, who violates any provision of this Permit; any rule, regulation or order of DEP; or any condition or limitation of any permit issued pursuant to the Clean Streams Law, is subject to criminal and/or civil penalties as set forth in Sections 602, 603 and 605 of the Clean Streams Law.

B. Falsifying Information

Any person who does any of the following:

- Falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, or
- Knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit (including monitoring reports or reports of compliance or non-compliance)

Shall, upon conviction, be punished by a fine and/or imprisonment as set forth in 18 Pa.C.S.A. § 4904 and 40 CFR §§ 122.41(j)(5) and (k)(2).

C. Liability

1. Nothing in this Permit shall be construed to relieve the permittee from civil or criminal penalties for non-compliance pursuant to Section 309 of the CWA or Sections 602, 603 or 605 of the Clean Streams Law.
2. Nothing in this Permit shall be construed to preclude the institution of any legal action or to relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject to under the CWA and the Clean Streams Law.

D. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(c))

III. OTHER RESPONSIBILITIES

A. Right of Entry

Pursuant to Section 5(b) of Pennsylvania's Clean Streams Law (35 P.S. § 691.5(b)), 25 Pa. Code Chapter 92a and 40 CFR § 122.41(i), the permittee shall allow authorized representatives of DEP and EPA, upon the presentation of credentials and other documents as may be required by law:

1. To enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(1))
2. To have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(2))

3. To inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this Permit; and (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(3))
4. To sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act or the Clean Streams Law, any substances or parameters at any location. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(i)(4))

B. Transfer of Permits

1. Transfers by modification. Except as provided in paragraph B.2 of this section, permit coverage may be transferred by the permittee to a new owner or operator only if this Permit coverage has been modified or revoked and reissued, or a minor modification made to identify the new permittee and incorporate such other requirements as may be necessary under the Clean Water Act. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(a))
 2. Automatic transfers. As an alternative to transfers under paragraph 1 of this section, any NPDES permit may be automatically transferred to a new permittee if:
 - a. The current permittee notifies DEP at least 30 days in advance of the proposed transfer date in paragraph 2.b. of this section; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(1))
 - b. The notice includes the appropriate DEP transfer form signed by the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between them; (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(2))
 - c. DEP does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue coverage under this permit, the transfer is effective on the date specified in the agreement mentioned in paragraph 2.b. of this section; and (25 Pa. Code § 92a.3(c) and 40 CFR § 122.61(b)(3))
 - d. The new permittee is in compliance with existing DEP issued permits, regulations, orders and schedules of compliance, or has demonstrated that any non-compliance with the existing permits has been resolved by an appropriate compliance action or by the terms and conditions of the permit (including compliance schedules set forth in the permit), consistent with 25 Pa. Code § 92a.51 (relating to schedules of compliance) and other appropriate DEP regulations. (25 Pa. Code § 92a.71)
 3. In the event DEP does not approve transfer of coverage under this permit, the new owner or controller must submit a new NOI.
- C. Property Rights – The approval of coverage under this Permit does not convey any property rights of any sort, or any exclusive privilege. (25 Pa. Code § 92a.3(c) and 40 CFR § 122.41(g))
- D. Duty to Reapply – If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for a new permit. (40 CFR 122.41(b))
- E. Severability – The provisions of this permit are severable. If any provision of this permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected.

PART C

SPECIAL CONDITIONS

I. STORMWATER MANAGEMENT PROGRAM (SWMP)

- A. The permittee must develop, implement, and enforce an SWMP designed to reduce the discharge of pollutants from the MS4 to the maximum extent practicable, to protect water quality, and to satisfy the appropriate water quality requirements of the Clean Water Act and Pennsylvania Clean Streams Law, as described in paragraph B, below. There are six Minimum Control Measures (MCMs) that comprise the SWMP. Specific BMPs are identified under each MCM. The permittee shall demonstrate compliance with the SWMP through the submission of Annual MS4 Status Reports due by September 30 each year.

B. Minimum Control Measures (MCMs)

1. **MCM #1:** Public Education and Outreach on Stormwater Impacts. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(1))

The permittee shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of stormwater discharges on water bodies and the steps that the public can take to reduce pollutants in stormwater runoff.

- a. **BMP #1:** Develop, implement and maintain a written Public Education and Outreach Program.

- (1) For new permittees, a written Public Education and Outreach Program (PEOP) shall be developed and implemented within one year following issuance of this permit, and shall be re-evaluated each year thereafter and revised as needed.

- (2) For existing permittees, the existing PEOP shall be reviewed annually and revised as necessary.

The permittee's PEOP shall be designed to achieve measurable improvements in the target audience's understanding of the causes and impacts of stormwater pollution and the steps they can take to prevent it.

- b. **BMP #2:** Develop and maintain lists of target audience groups that are present within the areas served by the permittee's regulated small MS4. In most communities, the target audiences shall include residents, businesses (including commercial, industrial and retailers), developers, schools, and municipal employees.

- (1) For new permittees, the lists shall be developed within one year following issuance of this permit, and reviewed and updated as necessary every year thereafter.

- (2) For existing permittees, the lists shall continue to be reviewed and updated annually.

- c. **BMP #3:** The permittee shall 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 permittee's SWMP, and/or information about the permittee's stormwater management activities. The list of publications and the content of the publications must be reviewed and updated at least once during each year of permit coverage. Publications should include a list of references (or links) to refer the reader to additional information (e.g., DEP and EPA stormwater websites, and any other sources that will be helpful to readers). The permittee must implement at least one of the following alternatives:

- Publish and distribute in printed form a newsletter, a pamphlet or a flyer containing information consistent with this BMP.
- Publish educational and informational items including links to DEP's and EPA's stormwater websites on the permittee's website.

- (1) For new permittees, stormwater educational and informational items shall be produced and published in print and/or on the Internet no later than one year following issuance of this permit.
- (2) In subsequent years, and for existing permittees, the list of items published and the content in these items shall be reviewed, updated, and maintained annually.

The permittee's publications shall contain stormwater educational information that addresses one or more of the six MCMs.

- d. **BMP #4:** Distribute stormwater educational materials and/or information to the target audiences using a variety of distribution methods, including but not limited to: displays, posters, signs, pamphlets, booklets, brochures, radio, local cable TV, newspaper articles, other advertisements (e.g., at bus and train stops/stations), bill stuffers, presentations, conferences, meetings, fact sheets, giveaways, and storm drain stenciling.

All permittees shall select and utilize at least two distribution methods annually. These are in addition to BMP #3, above.

2. **MCM #2:** Public Involvement / Participation. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(2))

The permittee shall comply with applicable state and local public notice requirements when implementing a public involvement / participation program.

- a. **BMP #1:** Develop, implement and maintain a written Public Involvement and Participation Program (PIPP) which describes various types of possible participation activities and describes methods of encouraging the public's involvement and of soliciting the public's input.

The PIPP for new permittees shall be developed and implemented within one year following issuance of this permit. All permittees shall reevaluate the PIPP annually and make revisions as necessary.

The PIPP shall include, at a minimum:

- (1) Opportunities for the public to participate in the decision-making processes associated with the development, implementation, and update of programs and activities related to this permit.
- (2) Methods of routine communication to groups such as watershed associations, environmental advisory committees, and other environmental organizations that operate within proximity to the permittee's regulated small MS4s or surface waters receiving the permittee's discharges.
- (3) Making Annual MS4 Status Reports and all other plans, programs, maps and reports required by this permit available to the public on the permittee's website, at the permittee's office(s), or by mail upon request.

- b. **BMP #2:** The permittee shall advertise to the public and solicit public input on the following documents prior to adoption or submission to DEP:

- Stormwater Management Ordinances (for municipalities); and
- Standard Operating Procedures (SOPs) (for non-municipal entities).

For Ordinances and SOPs, the permittee shall provide notice to the public; provide opportunities for public comment; document and evaluate the public comments; and document the permittee's responses to the comments prior to finalizing the documents. The permittee shall provide this documentation to DEP upon request.

- c. **BMP #3:** Regularly solicit public involvement and participation from the target audience groups using available distribution and outreach methods. This shall include an effort to solicit public reporting of suspected illicit discharges. Assist the public in their efforts to help implement the SWMP.

- (1) The permittee shall solicit public involvement and participation from target audience groups on the implementation of the SWMP. The solicitation can take the form of public meetings or other events. The public shall be given notice in advance of each meeting or event. During the meetings or events, the permittee should present a summary of progress, activities, and accomplishments with implementation of the SWMP, and the permittee should provide opportunities for the public to provide feedback and input. The presentation can be made at specific MS4 events or during any other public meeting. Existing permittees shall conduct at least one public meeting that includes information on SWMP implementation by March 15, 2028; new permittees shall conduct at least one public meeting within 5 years following issuance of this permit.
 - (2) The permittee shall document and report instances of cooperation and participation in MS4 activities; presentations the permittee made to local watershed organizations and conservation organizations; and similar instances of participation or coordination with organizations in the community.
 - (3) The permittee shall also document and report activities in which members of the public assisted or participated in the meetings and in the implementation of the SWMP, including education activities or organized implementation efforts such as cleanups, monitoring, storm drain stenciling, or others.
3. **MCM #3:** Illicit Discharge Detection and Elimination (IDD&E). (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(3))

The permittee shall develop, implement and enforce a program to detect and eliminate illicit discharges into the permittee's regulated small MS4.

- a. **BMP #1:** The permittee shall develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated small MS4. The program shall include the following:
- Procedures for identifying priority areas. These are areas with a higher likelihood of illicit discharges, illicit connections or illegal dumping. Priority areas may include areas with older infrastructure, a concentration of high-risk activities, or past history of water pollution problems.
 - Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.
 - Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
 - Procedures for eliminating an illicit discharge.
 - Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.
 - Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
 - Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
 - Procedures for addressing information or complaints received from the public.

- (1) For new permittees, the IDD&E program shall be developed during the first year following issuance of this permit and shall be implemented and evaluated each year thereafter.
 - (2) For existing permittees, the IDD&E program shall continue to be implemented and evaluated annually.
- b. **BMP #2:** The permittee shall develop and maintain map(s) that show permittee and urbanized area boundaries, the location of all outfalls and, if applicable, observation points, and the locations and names of all surface waters that receive discharges from those outfalls. Outfalls and observation points shall be numbered on the map(s).
- (1) For new permittees, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance) or the fourth (4th) Annual MS4 Status Report following issuance of this permit, whichever is later.
 - (2) For existing permittees, the existing map(s) shall be updated and maintained as necessary during each year of coverage under this permit.
- c. **BMP #3:** In conjunction with the map(s) created under BMP #2 (either on the same map or on a different map), the permittee shall develop and maintain map(s) that show the entire storm sewer collection system within the permittee's jurisdiction that are owned or operated by the permittee (including roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system), including privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components.
- (1) For new permittees, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance) or the fourth (4th) Annual MS4 Status Report following issuance of this permit, whichever is later.
 - (2) For existing permittees, the existing map(s) shall be updated and maintained as necessary during each year of coverage under this permit.
- d. **BMP #4:** The permittee shall conduct dry weather screenings of its MS4 outfalls and observation points to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. The permittee shall immediately report to DEP illicit discharges that would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, in accordance with Part A III.D.4 of this permit. An observation point must be established by the permittee at a location upstream of any discharge of stormwater into storm sewers owned or operated by an adjoining municipality.
- (1) For new permittees, all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following issuance of this permit.
 - (2) For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by (Enter Expiration Date). For areas where past problems have been reported or known sources of dry weather flows occur on a continual basis, outfalls shall be screened annually during each year of permit coverage. This includes any outfalls discharging flows from areas that were identified as suspected source areas for the pollutants identified in Appendices A, B and C during the previous permit term.
 - (3) If a discharge is observed from any outfall during dry weather screenings, the discharge shall be inspected for color, odor, floating solids, scum, sheen, and substances that result in observed deposits in the surface waters. In addition, the discharge cannot contain substances that result in deposits in the receiving water or produce an observable change in the color, odor or turbidity of the receiving water.

If the discharge exhibits any of the above characteristics, or contains any other pollutants or causes an observed change in the surface waters, the permittee shall sample the discharge(s) for field and/or laboratory analysis of one or more common IDD&E parameters in order to determine if the dry weather flow is illicit. Possible parameters include, but are not limited to: pH, Conductivity, Fecal Coliform bacteria, Heavy Metals, Chemical Oxygen Demand (COD), 5-day Biochemical Oxygen Demand (BOD5), Total Suspended Solids (TSS), Total Dissolved Solids (TDS), Oil and Grease, Total Residual Chlorine (TRC) and Ammonia-Nitrogen. Proper quality assurance and quality control procedures shall be followed when collecting, transporting or analyzing water samples. The permittee shall retain sample results with the inspection report in accordance with Part A III.B of this permit.

- (4) Each time an outfall is screened, the permittee shall record outfall observations, regardless of the presence of dry weather flow. All outfall inspections shall be documented on the MS4 Outfall Field Screening Report form (3800-FM-BCW0521), or equivalent. The report must be signed by the inspector and be maintained by the permittee in accordance with Part A III.B of this permit. If an outfall flow is determined by the permittee to be illicit, the actions taken to identify and eliminate the illicit flow shall also be documented.
 - (5) The permittee shall summarize the results of outfall inspections and actions taken to remove or correct illicit discharges in Annual MS4 Status Reports.
 - (6) If the permittee determines that an outfall cannot be accessed due to safety or other reasons, the permittee shall establish an "observation point" at an appropriate location prior to the outfall where outfall field screening shall be performed. If observation points are established by the permittee, such points shall be identified on the map required under BMP #2 of this section.
 - (7) Permittees must ensure that outfalls are properly maintained in accordance with Part C I.B.6.b of this Permit.
- e. **BMP #5:** Enact a Stormwater Management Ordinance or SOP to implement and enforce a stormwater management program that includes prohibition of non-stormwater discharges to the regulated small MS4.
- (1) New municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance). Existing municipal permittees shall continue to implement and enforce an existing ordinance.
 - (2) New permittees that lack the authority to enact ordinances (non-municipal permittees) shall develop and adopt an SOP that prohibits non-stormwater discharges consistent with this permit, and shall submit a copy of the SOP as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance). Existing non-municipal permittees shall continue to implement and enforce an existing SOP.
 - (3) Notice must be provided to DEP of the approval of any waiver or variance by the permittee that allows an exception to non-stormwater discharge provisions of an ordinance or SOP. This notice shall be submitted in the next Annual MS4 Status Report following approval of the waiver or variance.
- f. **BMP #6:** Provide educational outreach to public employees, business owners and employees, property owners, the general public and elected officials (i.e., target audiences) about the program to detect and eliminate illicit discharges.
- (1) During each year of permit coverage, appropriate educational information concerning illicit discharges shall be distributed to the target audiences using methods outlined under MCM #1. The permittee shall establish and promote a stormwater pollution reporting mechanism (e.g., a complaint line with message recording) by the end of the first year of Permit coverage for the public to use to notify the permittee of illicit discharges, illegal dumping or outfall pollution. The permittee shall respond to all complaints in a timely and appropriate manner. The permittee

shall document all responses, including the action taken, the time required to take the action, and whether the complaint was resolved successfully.

- (2) Educational outreach may include: distribution of brochures and guidance for target audiences including schools; programs to encourage and facilitate public reporting of illicit discharges; organizing volunteers to locate and visually inspect outfalls and to stencil storm drains; and implement and encourage recycling programs for common wastes such as motor oil, antifreeze and pesticides.

4. **MCM #4:** Construction Site Stormwater Runoff Control. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(4))

The permittee shall implement the BMPs identified below.

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

In addition, prior to the issuance of building or other permits or final approvals for earth disturbance activities that do not require an NPDES permit, the permittee shall require that applicants of proposed earth disturbance activities obtain approval from DEP or a delegated conservation district prior to removing, modifying, or otherwise negatively impacting any existing post-construction stormwater management (PCSM) BMPs on the site.

- b. **BMP #2:** A municipality or county which issues building or other permits shall notify DEP or a delegated county conservation district (CCD) within 5 days of the receipt of an application for a permit involving an earth disturbance activity consisting of one acre or more, in accordance with 25 Pa. Code § 102.42.
- c. **BMP #3:** Enact, implement and enforce an ordinance or SOP to require the implementation and maintenance of E&S control BMPs, including sanctions for non-compliance, as applicable.
 - (1) New municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of E&S control BMPs, including sanctions for non-compliance. New municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance). Existing municipal permittees shall continue to implement and enforce an existing ordinance.
 - (2) New permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of E&S control BMPs by September 30, (Enter Year - Four Years After Issuance). Existing non-municipal permittees shall continue to implement and enforce an existing SOP.

5. **MCM #5:** Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(5))

The permittee shall implement the BMPs identified below.

- a. **BMP #1:** Enact, implement and enforce an ordinance or SOP to require post-construction stormwater management from new development and redevelopment projects, including sanctions for non-compliance.
 - (1) New municipal permittees shall enact, implement, and enforce an ordinance to require the implementation of PCSM BMPs, including sanctions for non-compliance. New municipal permittees shall submit a copy of an ordinance that is consistent with DEP's 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, (Enter Year - Four Years After Issuance). Existing municipal permittees shall continue to implement and enforce an existing ordinance.

- (2) Permittees that lack the authority to enact ordinances shall develop, implement and enforce an SOP to require the implementation and maintenance of PCSM BMPs and submit the SOP to DEP by September 30, (Enter Year - Four Years After Issuance). Existing non-municipal permittees shall continue to implement and enforce an existing SOP.
- b. **BMP #2:** Develop and implement measures to encourage and expand the use of Low Impact Development (LID) in new development and redevelopment. Measures should also be included to encourage retrofitting LID into existing development. Guidance on implementing LID practices may be found on DEP's MS4 website, www.dep.pa.gov/MS4. Enact ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices.
- c. **BMP #3:** Ensure adequate O&M of all PCSM BMPs that have been installed at development or redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale and BMPs installed by the permittee to satisfy Pollutant Reduction Plan (PRP) and TMDL Plan obligations in prior permit terms.

An inventory of BMPs shall be developed by new permittees by the end of the first year of Permit coverage and shall be continually updated during the term of coverage under the Permit as development projects are reviewed, approved, and constructed. Existing permittees shall update and maintain its current inventory during the term of coverage under the Permit. The permittee must track the following information in its BMP inventory:

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

The permittee shall submit the BMP inventory to DEP with each Annual MS4 Status Report.

6. **MCM #6:** Pollution Prevention / Good Housekeeping. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.34(b)(6))

The permittee must develop and implement an O&M program that includes a training component and has the ultimate goal of preventing and reducing pollutant runoff from operations, facilities and activities under the control of the permittee (collectively, "operations"). The program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

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

riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).

- (1) New permittees shall create an inventory of all operations and land uses that may contribute to pollution in stormwater runoff within areas of operations that discharge to the regulated small MS4 by the end of the first year of permit coverage, and review and update the inventory annually thereafter.
 - (2) All permittees must review and update the inventory each year of permit coverage, as necessary.
- b. **BMP #2:** Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the regulated small MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated MS4. The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following:
- Management practices, policies, and procedures shall be developed and implemented to reduce or prevent the discharge of pollutants to the regulated small MS4s. The permittee shall consider eliminating maintenance area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.
 - Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the regulated small MS4s.
 - Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer stations, fleet or maintenance shops with outdoor storage areas, salt / sand (anti-skid) storage locations and snow disposal areas. Controls for solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety must be consistent with the BMPs for existing salt storage and distribution sites contained in the PAG-03 NPDES Permit for Stormwater Discharges Associated with Industrial Activity.
 - Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.
- (1) New permittees shall develop and implement a written O&M program by the end of the first year of permit coverage and review and update the program each year thereafter.
 - (2) All permittees must review and update the written O&M program each year of permit coverage, as necessary.
- c. **BMP #3:** Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance and repair activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee's overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.
- (1) New permittees shall develop and implement a training program that identifies the training topics that will be covered and what training methods and materials will be used by the end of the first year of permit coverage.
 - (2) All permittees must review and update the training program each year of permit coverage, as necessary.

- (3) Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).

II. POLLUTANT REDUCTION PLANS

- A. A Pollutant Reduction Plan (PRP) is a planning document prepared by the permittee which guides the selection and implementation of specific BMPs to reduce pollutant loading to surface waters. The objective of a PRP is to improve the condition of surface waters such that the waters eventually attain water quality standards and its designated and existing uses in accordance with 25 Pa. Code Chapter 93. In the prior permit term, the permittee may have been required to develop PRP(s) and submit the PRP(s) to DEP with the permit application if one or more of the following criteria are met:
 1. At the time of the application submission, the permittee has at least one MS4 outfall that discharges to surface waters within the Chesapeake Bay watershed, or otherwise has at least one discharge to storm sewers owned or operated by a different entity within the Chesapeake Bay watershed.
 2. At the time of the application submission, the permittee has at least one stormwater outfall that discharges to waters impaired for nutrients (i.e., nitrogen and/or phosphorus) and/or sediment (i.e., siltation), and a TMDL has not been approved for such waters, or a TMDL has been approved but no wasteload allocation (WLA) has been assigned by the TMDL for the permittee's discharge(s).
- B. The permittee shall, where applicable, complete implementation of the permittee's approved PRP(s) to achieve the pollutant load reductions specified in the PRP(s) within 5 years following DEP's approval of the PRP(s). The permittee shall submit a report demonstrating implementation of the PRP(s) as an attachment to the first Annual MS4 Status Report that is due following completion of the permittee's 5th year of coverage under the prior permit.

III. TMDL PLANS

A TMDL Plan is a planning document prepared by the permittee which guides the selection and implementation of specific BMPs to reduce pollutant loading to surface waters and comply with the TMDL. The permittee shall, where applicable, complete implementation of the permittee's approved TMDL Plan(s) to achieve the pollutant load reductions specified in the TMDL Plan(s) within 5 years following DEP's approval of the TMDL Plan(s). The permittee shall submit a report demonstrating implementation of the TMDL Plan(s) as an attachment to the first Annual MS4 Status Report that is due following completion of the permittee's 5th year of coverage under the prior permit.

IV. OTHER REQUIREMENTS

- A. Screenings and other solids collected by the permittee shall be handled, recycled and/or disposed of in compliance with the Solid Waste Management Act (35 P.S. §§ 6018.101 – 6018.1003), 25 Pa. Code Chapters 287, 288, 289, 291, 295, 297, and 299 (relating to requirements for landfilling, impoundments, land application, composting, processing, and storage of residual waste), federal regulation 40 CFR Part 257, The Clean Streams Law, and the Federal Clean Water Act and its amendments.
- B. DEP may require monitoring of stormwater discharge(s) as may be reasonably necessary in order to characterize the nature, volume or other attributes of that discharge or its sources.
- C. The permittee shall ensure that its SWMP, including its Stormwater Management Ordinance(s) or SOPs, is designed to prevent increased loadings of pollutants and to not cause or contribute to a violation of water quality standards by any discharge from its regulated small MS4.
- D. The permittee shall develop and maintain adequate legal authorities, where applicable, and shall maintain adequate funding and staffing to implement this Permit, including the SWMP contained in Part C I of this Permit.

- E. In accordance with 40 CFR § 122.35, the permittee may rely on another entity to satisfy NPDES permit obligations to implement a minimum control measure if: (1) the other entity, in fact, implements the control measure; (2) the particular control measure, or component thereof, is at least as stringent as the corresponding NPDES permit requirement; and (3) the other entity agrees to implement the control measure on the permittee's behalf. The permittee must specify in Annual MS4 Status Reports that it is relying on another entity to satisfy some of its NPDES permit obligations. The permittee remains responsible for compliance with permit obligations if the other entity fails to implement the control measure (or component thereof).
- F. This permit authorizes the discharge of stormwater to surface waters from the permittee's regulated small MS4. In addition, the following non-stormwater discharges are authorized by this permit as long as such discharges do not cause or contribute to pollution as defined in Pennsylvania's Clean Streams Law:
1. Discharges or flows from firefighting activities.
 2. Discharges from potable water sources including water line flushing and fire hydrant flushing, if such discharges do not contain detectable concentrations of Total Residual Chlorine (TRC).
 3. Non-contaminated irrigation water, water from lawn maintenance, landscape drainage and flows from riparian habitats and wetlands.
 4. Diverted stream flows and springs.
 5. Non-contaminated pumped ground water and water from foundation and footing drains and crawl space pumps.
 6. Non-contaminated HVAC condensation and water from geothermal systems.
 7. Residential (i.e., not commercial) vehicle wash water where cleaning agents are not utilized.
 8. Non-contaminated hydrostatic test water discharges, if such discharges do not contain detectable concentrations of TRC.
- G. In the event existing outfall(s) are identified during the permit term that were not identified on maps submitted as part of the application (where required), the permittee shall identify the outfall(s) in the subsequent Annual MS4 Status Report that is submitted to the DEP office that approved permit coverage. In the event new stormwater outfalls are proposed, the permittee shall submit written notification to the DEP office that issued the permit at least 60 days prior to commencing a discharge.



Application Type Renewal
Facility Type MS4
MS4 Type Small

**INDIVIDUAL MS4
CHECKLIST**

Application No. PAI133540
APS ID 956949
Authorization ID 1514604

Applicant and Facility Information

Applicant Name	<u>Lower Paxton Township Dauphin County</u>	Facility Name	<u>Lower Paxton Township Dauphin County MS4</u>
Applicant Address	<u>425 Prince Street</u> <u>Harrisburg, PA 17109-3054</u>	Facility Address	<u>425 Prince Street</u> <u>Harrisburg, PA 17109-3054</u>
Municipality	<u>Lower Paxton Township</u>	County	<u>Dauphin</u>
Receiving Water(s)	<u>Nyes Run (WWF, MF), Slotznick Run (CWF, MF), Unnamed Tributary of Paxton Creek (WWF, MF), Paxton Creek (WWF, MF), Unnamed Tributary to Paxton Creek (WWF, MF), Asylum Run (WWF, MF), Beaver Creek (WWF, MF), Spring Creek (CWF, MF), and Unnamed Tributary to Beaver Creek (WWF, MF)</u>	Ch. 93 Class.	<u>MF, WWF, and CWF</u>
Date Application Received	<u>January 30, 2025</u>		

Checklist

	<u>Completeness Item</u>	<u>Comments</u>
<input checked="" type="checkbox"/>	1. One original and two copies of complete NOI (3800-PM-BCW0100b).	Received via PUP 288882.
<input type="checkbox"/>	2. One original and two copies of complete Waiver Application (3800-PM-BCW0100e) (optional).	N/A
<input checked="" type="checkbox"/>	3. Complete storm sewer system map (existing permittees) (note – new urbanized areas do not require mapping of entire storm sewer collection system).	
<input type="checkbox"/>	4. Topographic map or storm sewer system map (new permittees and existing waivers).	N/A
<input checked="" type="checkbox"/>	5. MOU or written agreement for third party MCM implementation (if applicable).	
<input checked="" type="checkbox"/>	6. Stormwater Management Ordinance (municipal applicants seeking renewed coverage only).	
<input checked="" type="checkbox"/>	7. Stormwater Management Ordinance Checklist (3800-PM-BCW0100g) (if applicable).	
<input type="checkbox"/>	8. SOPs (non-municipal applicants seeking renewed coverage only).	N/A
<input type="checkbox"/>	9. Chesapeake Bay PRP (Appendix D) and/or Impaired Waters PRP (Appendix E), where required.	Previously approved 8/1/2020.

Approve	Deny	Signature	Date
X		<i>Jacob S. Rakowsky</i> Jacob S Rakowsky, E.I.T. / Project Manager	2/21/2025
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	2/21/2025

<input type="checkbox"/>	9a. PRP public participation requirements – the PRP contains a copy of the public notice advertising the PRP, a copy of all written comments received from the public to the PRP, and a copy of the permittee's record of consideration of all timely comment received in the public comment period.	N/A
<input type="checkbox"/>	9b. PRP contains a map that identifies land uses and/or impervious/pervious surfaces and the storm sewershed boundary(ies) (note – this map may be combined with item #3 for existing permittees).	N/A
<input type="checkbox"/>	9c. PRP contains a section that describes the pollutants of concern.	N/A
<input type="checkbox"/>	9d. PRP contains existing load calculations for pollutants of concern.	N/A
<input type="checkbox"/>	9e. PRP selects BMPs to achieve the minimum required reductions in pollutant loading	N/A
<input type="checkbox"/>	9f. PRP identifies funding mechanisms.	N/A
<input type="checkbox"/>	9g. PRP identifies responsible parties for operation and maintenance (O&M) of BMPs.	N/A
<input type="checkbox"/>	9h. For joint PRPs, a written agreement amongst the parties is attached (if applicable).	N/A
<input type="checkbox"/>	10. TMDL Plan (Appendix F), where required.	Previously approved 8/1/2020.
<input type="checkbox"/>	10a. TMDL Plan public participation requirements (see 9a).	N/A
<input type="checkbox"/>	10b. Plan contains a map that identifies land uses and/or impervious/pervious surfaces and the storm sewershed boundary(ies).	N/A
<input type="checkbox"/>	10c. Plan contains describes the pollutants of concern.	N/A
<input type="checkbox"/>	10d. Plan contains existing load calculations.	N/A
<input type="checkbox"/>	10e. Plan identifies wasteload allocations (WLAs).	N/A
<input type="checkbox"/>	10f. Plan contains an analysis of short- and long-term objectives.	N/A
<input type="checkbox"/>	10g. PRP selects BMPs to achieve the minimum required reductions in pollutant loading.	N/A
<input type="checkbox"/>	10h. PRP identifies funding mechanisms.	N/A
<input type="checkbox"/>	10i. PRP identifies responsible parties for O&M of BMPs.	N/A
<input type="checkbox"/>	10j. For joint PRPs, a written agreement amongst the parties is attached (if applicable).	N/A
<input type="checkbox"/>	11. Complete NOI packages for each co-applicant (joint NOIs only). NOTE – Each municipality served by an authority must also submit an NOI.	N/A

Other Comments:

Refer to Fact Sheet for Internal Review and Recommendations.

Application Type Renewal
Facility Type MS4
Permit Type Individual

NPDES PERMIT FACT SHEET MS4s

Application No. PAI133540
APS ID 956949
Authorization ID 1514604

Applicant and Facility Information

<p>Applicant Name <u>Lower Paxton Township Dauphin County</u></p> <p>Applicant Address <u>425 Prince Street</u> <u>Harrisburg, PA 17109-3054</u></p> <p>Applicant Contact <u>Larry Stepansky</u></p> <p>Applicant Phone <u>(717) 657-5600</u></p> <p>Client ID <u>77433</u></p> <p>SIC Code <u>9199</u></p> <p>SIC Description <u>Public Admin. - Genral Government, Nec</u></p> <p>Date Application Received <u>January 30, 2025</u></p> <p>Date Application Accepted <u>February 13, 2025</u></p> <p>Purpose of Application <u>Renewal application for an individual MS4 NPDES Permit.</u></p>	<p>Facility Name <u>Lower Paxton Township Dauphin County MS4</u></p> <p>Facility Address <u>425 Prince Street</u> <u>Harrisburg, PA 17109-3054</u></p> <p>Facility Contact <u>Larry Stepansky</u></p> <p>Facility Phone <u>(717) 657-5600</u></p> <p>Site ID <u>614826</u></p> <p>Municipality <u>Lower Paxton Township</u></p> <p>County <u>Dauphin</u></p>
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Internal Review and Recommendations

Per 40 CFR § 122.33, and PA Title 25 § 92a.3, Lower Paxton Township (the applicant) is required to seek coverage under an NPDES permit issued by the state of Pennsylvania. Due to the applicant's discharge to waters requiring a TMDL Plan, the applicant has submitted an application for coverage under an individual permit. Per PA Title 25 § 92a.54, the applicant is eligible for permit coverage.

The applicant discharges to the following waters: Nyes Run (WWF, MF), Slotznick Run (CWF, MF), Unnamed Tributary of Paxton Creek (WWF, MF), Paxton Creek (WWF, MF), Unnamed Tributary to Paxton Creek (WWF, MF), Asylum Run (WWF, MF), Beaver Creek (WWF, MF), Spring Creek (CWF, MF), and Unnamed Tributary to Beaver Creek (WWF, MF).

During the previous permit term, the applicant submitted a combined Local Impairment Reduction Plan, Chesapeake Bay Pollutant Reduction Plan, and TMDL Plan. The plan was a joint plan with Harrisburg City and Susquehanna Township and combines the Chesapeake Bay PRP and Paxton Creek Watershed TMDL Plan. The plan was approved on 8/1/2020 and expires 7/31/2025.

There are no unresolved violations associated with the applicant that would affect issuance of coverage.

It is recommended that individual permit coverage is granted in accordance with 40 CFR §123.35.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-

Approve	Deny	Signatures	Date
X		Jacob S. Rakowsky Jacob S Rakowsky, E.I.T. / Project Manager	2/21/2025
X		Scott M. Arwood Scott M. Arwood, P.E. / Environmental Engineer Manager	2/21/2025

Internal Review and Recommendations

day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Southcentral Regional Office

PAI133540, MS4, **Lower Paxton Township Dauphin County**, 425 Prince Street, Harrisburg, PA 17109-3054.

The application is for a renewal of an individual NPDES permit for the discharge of stormwater from a regulated municipal separate storm sewer system (MS4) to waters of the Commonwealth in Lower Paxton Township, **Dauphin County**. The receiving stream(s), Nyes Run (WWF, MF), Slotznick Run (CWF, MF), Unnamed Tributary of Paxton Creek (WWF, MF), Paxton Creek (WWF, MF), Unnamed Tributary to Paxton Creek (WWF, MF), Asylum Run (WWF, MF), Beaver Creek (WWF, MF), Spring Creek (CWF, MF), and Unnamed Tributary to Beaver Creek (WWF, MF), is located in State Water Plan watershed 7-D and 7-C and is classified for Warm Water Fishes, Migratory Fishes, and Cold Water Fishes, aquatic life, water supply and recreation. The applicant is classified as a small MS4.

You may make an appointment to review the DEP files on this case by calling the File Review Coordinator at 717-705-4732.

The EPA waiver is in effect for small MS4s, and is not in effect for large MS4s.

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NOTICES

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Draft National Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (PAG-13)

**[55 Pa.B. 601]
[Saturday, January 18, 2025]**

The Department of Environmental Protection (Department) is announcing the availability of a draft National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (PAG-13). To access the draft General Permit and related documents, visit the Department's eLibrary website at <https://greenport.pa.gov/elibrary/> (select "Permit and Authorization Packages," then "Clean Water," then "Draft PAG-13 NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)"). PAG-13 is intended to provide NPDES permit coverage to small municipal separate storm sewer systems (MS4) for stormwater discharges to surface waters.

The following significant changes are proposed in the draft PAG-13 General Permit in comparison to the PAG-13 General Permit that became effective on March 16, 2018 (2018 General Permit):

- As guided by the workgroup, the Department convened to develop changes to the PAG-13 (see 52 Pa.B. 6107 (September 24, 2022)), the Department is proposing a new approach in the draft PAG-13 for restoring surface waters that are impaired for reasons that may be related to urban stormwater, including the Chesapeake Bay. In recognition of the anticipated increase in runoff in this Commonwealth as a result of climate change, and the fact that the impact of excessive runoff through flooding is more easily understood by local officials and residents, the Department is proposing to focus the draft PAG-13 on the reduction or management of runoff volume, rather than directly on pollutant loads, with the strong scientific consensus that managing stormwater runoff volume also decreases loads of key pollutants, like nutrients and sediment.

- The Department is proposing to require MS4s to complete a Maximum Extent Practicable (MEP) Calculator Spreadsheet and submit the results with the Notice of Intent (NOI) for coverage under the reissued PAG-13 General Permit. The MEP Calculator Spreadsheet is intended to determine the volume of stormwater runoff management that is feasible for each MS4—based on the socioeconomic characteristics and opportunities for stormwater management within the MS4—in preparation for the development of a Volume Management Plan (VMP), which would be due by September 30, 2028. The MEP Calculator Spreadsheet also includes the option for MS4s to receive credits for collaboration with other MS4s; these credits can reduce an MS4's Volume Management Objective (VMO) in their VMP. The Department proposes to provide MS4s with 2 years to prepare VMPs. The VMP would replace the Pollutant Reduction Plan (PRP) requirement from the 2018 PAG-13 General Permit. Instructions for using the MEP Calculator Spreadsheet are provided in the draft PAG-13 NOI Instructions (3800-PM-BCW0100a) and the draft MEP Calculator Spreadsheet has been posted to the Department's MS4 website at www.dep.pa.gov/MS4. For VMPs, the

Department also proposes to provide an incentive, in the form of an additional 10% volume management credit when stormwater control measures (SCM) will be located in Environmental Justice (EJ) areas and when SCMs will help alleviate local flooding. More information on VMPs has been provided in the draft VMP instructions (3800-PM-BCW0100h) and draft PAG-13 Fact Sheet (3800-PM-BCW0100g).

- The Department is proposing to discontinue implementation of Pollutant Control Measures in the draft PAG-13 to provide time for the Department to evaluate the results of this effort.

- The Department is proposing two changes to eligibility requirements. First, the 2018 General Permit prohibits any MS4 that discharges to waters impaired for nutrients or sediment from using PAG-13 when the MS4 is required to achieve a wasteload allocation in a Total Maximum Daily Load. The Department is proposing to update the causes of impairment from nutrients or sediment to include turbidity, Total Suspended Solids, siltation, algae, eutrophication, nutrients, flow regime modification and habitat alterations. Second, if an MS4 discharges to waters impaired for the updated causes, the MS4 would not be eligible to use PAG-13 unless it identifies a VMO in the NOI and submits a VMP to the Department by September 30, 2028.

- The 2018 General Permit required MS4s to prepare and submit an update to their stormwater management ordinance by September 30, 2022, that is consistent with the Department's 2022 Model Ordinance. The Department is proposing changes to the 2022 Model Ordinance. The model ordinance would be renamed to the 2028 Model Ordinance and PAG-13 would require updates to local ordinances consistent with the 2028 Model Ordinance by September 30, 2028.

- The Department is proposing a requirement that any municipal permittees relying on a delegated county conservation district (CCD) to implement Minimum Control Measures (MCM) # 4 and # 5 of the PAG-13 General Permit attempt to enter into a Memorandum of Understanding or other written agreement with the CCDs to ensure clear understanding of roles and responsibilities for earth disturbance activities under MCMs # 4 and # 5.

- For the 2018 General Permit, coverage was approved without an expiration date and the submission of annual reports also served as an NOI to continue coverage each year. The Department is proposing to change this approach by requiring submission of a renewal NOI every 5 years rather than every year.

- For MCM # 2 (Public Involvement/Participation), the Department is proposing that if a permittee's jurisdiction contains EJ areas, the Public Involvement and Participation Plan must include targeted outreach for EJ areas.

- References to the 2010 census have been updated to the 2020 census. If an entity was automatically designated a small regulated MS4 due to the presence of urbanized areas according to the 2010 census but has no urban area according to the 2020 census, the entity will continue to be considered a small regulated MS4, although these entities may be eligible for a waiver if the permittee has satisfied its obligations in the prior permit term.

The proposed NOI fee of \$2,500, paid in annual increments of \$500, has not changed in comparison to the 2018 General Permit. The NOI fee is due annually by September 30.

The Department published notice at 52 Pa.B. 6107 that the PAG-13 General Permit had been extended to March 15, 2025. On May 18, 2024, The Department published notice at 54 Pa.B. 2693 (May 18, 2024) that the PAG-13 General Permit had been extended until the general permit is reissued. The Department anticipates that the final PAG-13 General Permit will become effective on October 1, 2026.

The Department anticipates that MS4s seeking to obtain new coverage under PAG-13 or continue existing coverage will need to submit an NOI to the appropriate Department regional office by September 30, 2026. If a small MS4 has existing PAG-13 coverage and has not complied with the terms and conditions of the existing PAG-13 General Permit, including the requirement to submit a final report documenting implementation of an approved PRP (as applicable), the Department anticipates that the MS4 will need to submit an application for an individual NPDES permit by September 30, 2026.

Written Comments: Interested persons are invited to submit written comments regarding the draft PAG-13 General Permit and associated documents through Wednesday, March 19, 2025. Commentators are encouraged to submit comments using the Department's online eComment system at www.ahs.dep.pa.gov/eComment. Written comments can also be submitted by email to ecomment@pa.gov or by mail to the Department of Environmental Protection, Policy Office, Rachel Carson State Office Building, P.O. Box 2063, Harrisburg, PA 17105-2063. Comments, including comments submitted by email, must include the originator's name and address.

Written comments submitted during the 60-day comment period will be retained by the Department and considered in finalizing the General Permit. The Department will provide an opportunity for any interested person or group of persons, any affected state, any affected interstate agency, the United States Environmental Protection Agency or any interested agency, to request or petition for a public hearing with respect to the proposed General Permit. The request or petition for public hearing, which must be filed within the 60-day period allowed for filing of written comments, must indicate the interest of the party filing the request and the reasons a hearing is warranted. A hearing will be held if there is significant public interest.

JESSICA SHIRLEY,
Acting Secretary

[Pa.B. Doc. No. 25-90. Filed for public inspection January 17, 2025, 9:00 a.m.]

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INSTRUCTIONS FOR USING THE MEP CALCULATOR SPREADSHEET

Draft, January 2025

Introduction

DEP has developed the Maximum Extent Practicable (MEP) Calculator Spreadsheet to standardize the determination of MEP volume management objectives (VMOs) for the PAG-13 General Permit. One of the objectives of PAG-13 is for MS4s to manage the volume of stormwater runoff from impervious surfaces to the MEP. A [lookup chart](#) has been developed by DEP to identify the VMO for the 2026-2031 PAG-13 General Permit term as a function of total impervious area within the Census-designated Urban Area (UA) of a municipality or other designated MS4 entity and the percentage of the total impervious area that is treated by stormwater control measures (SCMs).

Each MS4 must complete the MEP Calculator separately. The lookup chart is used to establish the annualized VMO for the MS4. The VMO may be reduced by calculating a feasibility index and by collaborating with other MS4s to achieve collective volume management objectives. The total impervious area is that which was determined under the 2010 Census supplemented with any additional impervious area identified by the 2020 Census.

Questions on the use of the spreadsheet can be directed to DEP's Bureau of Clean Water at RA-EPPAMS4@pa.gov.

General Information

The spreadsheet was designed using the latest version of Microsoft Excel® and is in Excel macro-enabled workbook (XLSM) format. If prompted by Excel after opening the spreadsheet, enable editing and macros. *Note that you may need to add additional Trusted Locations in the Trust Center Settings of Excel in order to run the macros.* These locations may include server drives and/or locations where you intend to save the file for use. The following steps may be taken:

1. File > Excel Options > Trust Center > Trust Center Settings > Trusted Locations
2. Check the box to "Allow Trusted Locations on my network"
3. Select "Add new location"
4. Browse to select the folder (or server) where the file will be saved, check the "Subfolders of this location are also trusted" box, and then OK.

In addition, if you receive a message that your operating system has blocked macros from executing in the spreadsheet, you will need to unblock the file (in general, right click on the file, select "Properties," and check the box for "Unblock").

The spreadsheet contains two primary worksheets: MEP Calculator and SCM Types. The SCM Types worksheet allows the user to select the type of SCMs that the MS4 would like to report in their SCM Inventory. The SCM Inventory must be populated in order to determine the percentage of total impervious area treated, which is needed to determine the VMO. If the SCM Inventory is not completed, it is assumed that 0-5% of the impervious area is treated. The SCM Inventory includes five different worksheets: Floodplain Restoration, Stream Restoration, Retrofits, Volume SCMs, and Other SCMs.

At the top of the MEP Calculator and SCM Inventory worksheets there is a "Clear Form" button. The user may click the "Clear Form" button at any time to delete all data from the worksheet.

All cells available for data entry or selection from a drop-down menu are highlighted. The user may use the Tab, arrow, or Enter keys to move from cell to cell.

Throughout the spreadsheet, cells are formatted to display a set number of decimal places. As such, the number displayed in a cell is not necessarily the exact number that is stored by the spreadsheet (e.g., the displayed number

may be rounded up from the exact number stored in the spreadsheet). Therefore, users may not be able to replicate a calculated value using only the numbers displayed in the cells due to the spreadsheet's rounding of input values to meet formatting requirements.

Completing the MEP Calculator Worksheet

Maximum Extent Practicable (MEP) Calculator
for Volume Management Plans

MS4 Name:
Permit No.:

Surface Waters:

- **MS4 Name** – Enter the name of the MS4 entity as identified on page 1 of the NPDES permit.
- **Permit No.** – Identify the NPDES Permit Number(s) held by the MS4.
- **Surface Waters** – List the impaired surface waters covered by the MEP analysis. For MS4s within the Chesapeake Bay watershed, include any local impaired waters as well as “Chesapeake Bay.”

Step 1: Determine Annualized Volume Management Objective

☒ **Step 1: Determine Annualized Volume Management Objective**

Total Impervious Area, UA (ac):	<input style="width: 100%;" type="text"/>	
Impervious Area Treated, UA (%):	<input style="width: 100%;" type="text"/>	(Complete SCM Inventory)
Annualized Volume Management Objective:	<input style="width: 100%;" type="text"/>	CF/Yr

- **View Chart Button** – See the discussion below on the [Volume Management Chart](#).
- **Total Impervious Area, UA (ac)** – Select the range representing the Total Impervious Area within the UA in acres. All impervious area in the UA must be reported; no parsing is allowed. Report the total impervious area using the 2010 census map overlain by the 2020 census map. Report the total impervious within the combined 2010 and 2020 UA area.

Do not include impervious area that drains to a combined sewer system (CSS) or impervious area that is on properties owned by another entity with NPDES permit coverage for MS4 discharges (like counties or state agencies). Do include all other impervious areas (including areas covered by an NPDES permit for industrial stormwater discharges), both publicly and privately owned. Impervious areas are areas meeting criterion 1 and either 2, 3, or 4, below:

1. Land covers that do not allow for infiltration and contain the term “impervious” in the description under the Natural Resources Conservation Service (NRCS) Publication TR-55. Compacted gravel areas and bodies of water, including surface waters and pools, should be considered impervious. Elevated structures, such as decks where pervious surfaces exist beneath them, should not be considered impervious; and
2. Areas mapped as impervious by the MS4 using high-resolution aerial photography or LIDAR or is field verified in preparing the MEP Calculator Spreadsheet; or

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3. In the absence of municipal-scale mapping, it is acceptable to use the latest National Land Cover Database (NLCD) to estimate impervious areas. If this is done, the permittee must assume that percent impervious for developed lands are as follows: Developed Open Space – 19% impervious; Developed Low Intensity – 49% impervious; Developed Medium Intensity – 79% impervious; and Developed High Intensity – 100% impervious. Impervious areas are expected to be field verified before the Volume Management Plan (VMP) is submitted to DEP; or
 4. Permittees located in the Chesapeake Bay watershed may use the most current Chesapeake Conservancy high-resolution land cover classification data set. If this data set is used, all areas shown as impervious and tree canopy over impervious must be considered impervious. Impervious areas are expected to be field verified before the VMP is submitted to DEP.
- **Impervious Area Treated, UA (%)** – The range that represents the percentage of impervious area within the UA that is treated will be calculated and displayed upon completion (or partial completion) of the SCM Inventory. Treated impervious area is that in which at least the first inch of runoff is captured by an SCM that reduces volume by infiltration and/or evapotranspiration (ET) or manages volume through a Managed Release Concept (MRC) SCM, with certain exceptions. The SCM must be maintained and functional to be counted toward treatment of impervious surface. Additional information is provided below for the [SCM Inventory](#).

From the user's entries the Annualized VMO is derived from the [Volume Management Chart](#) and is displayed in cubic feet per year (CF/Yr).

Step 2: Calculate Feasibility Index

A feasibility index is calculated using multiple factors that estimate the MS4's ability to achieve the Annualized VMO calculated in Step 1. MS4s that are not municipalities should skip factors A through D. Numbers in parentheses correspond to input parameters in the MEP Calculator Spreadsheet.

Financial / Socioeconomic Factors

- A. **Ratio, Municipal:PA LQI, 2020:** Enter the Lowest Quintile Household Income (LQI) for the municipality **(2)**. This value is divided by the Pennsylvania LQI of \$14,400 **(1)** to determine the ratio of the municipal LQI to the Pennsylvania LQI. To determine LQI for the municipality the following steps should be taken:
 1. Access the [American Community Survey \(ACS\) 5-Year Estimates Subject Table for Mean Household Income of Quintiles](#).
 2. Select "Geos" in the table header.
 3. In the Select Geography window, scroll to select "County Subdivision" from the list of All Geographies and select Pennsylvania for the state.
 4. Select the appropriate county and click in the check box for the municipality, then close the Geography window.
 5. Enter the value displayed for Lowest Quintile into the MEP Calculator Spreadsheet.
- B. **Ratio, Municipal:PA Poverty Rate:** Enter the municipal poverty rate based on the latest available published data **(4)**. This value is divided by the [Pennsylvania poverty rate](#) of 12% **(3)** to determine the ratio of the municipal poverty rate to the Pennsylvania poverty rate. DEP recommends that the following steps be taken to determine the municipal poverty rate:
 1. Go to the [Small Area Income and Poverty Estimates](#) tool on the U.S. Census Bureau's website.

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2. Filter by state, county, and school district for all ages. Select the school district that is located within the municipality's urban area. If there are multiple school districts the average poverty rate should be used.
- C. **Ratio, Municipal:PA Unemployment Rate (UR), current:** Enter the Pennsylvania **(5)** and municipal **(6)** URs, as of the time of the analysis, to determine the ratio of the municipal UR to the Pennsylvania unemployment rate. It is recommended that data published on the [Pennsylvania Department of Labor and Industry website](#) be used for Pennsylvania and the municipality. The latest Pennsylvania Civilian Labor Force Data by City / Borough / Township of Residence report is recommended for municipal UR. Locate the most recent report by clicking on Monthly News Releases under the Workforce Statistics (CWIA) heading and clicking the button for View the Civilian Labor Force Packet. County unemployment data may be used if no other local data are available or applicable. Report unadjusted unemployment rates.
- D. **Ratio, Municipal:Standard Utility Bill:** Enter the total annual utility bill for the average household in the municipality **(7)**. Include water, sewer, and stormwater fees (do not include electric, gas, refuse, etc.). The ratio of the annual utility bill to the municipal LQI **(2)** is calculated and displayed **(8)**. This value is divided by a standard utility bill of 8% of LQI **(9)** to obtain the ratio of the municipal to standard utility bill as a percentage of LQI. The 8% standard was derived by using a statewide average utility bill of approximately \$1,200/year divided by the LQI for Pennsylvania (\$14,400).
- E. **Long-Term Affordability Indicator:** Enter the total revenues received in the prior year **(10)**; the total debt as of December 31 of the prior year **(11)**; and the fund balance/retained earnings as of December 31 of the prior year **(12)**. For municipalities, this information is reported to the Pennsylvania Department of Community and Economic Development (DCED). The long-term affordability indicator is calculated by subtracting total debt **(11)** from the fund balance/retained earnings **(12)** and dividing by total revenues **(10)**, where the minimum and maximum values of the indicator are 0.5 and 1.5, respectively.

SCM Opportunities

This indicator takes into consideration several MS4-specific factors to qualitatively assess the potential for SCM opportunities.

- F. **SCM Opportunity Indicator:** The SCM Opportunity Indicator is calculated as the product of **(13)** through **(17)**. The higher the value, the lower the estimated opportunities for SCMs.
- **Percent of impervious area that is owned by the permittee:** Enter the percent of the Total Impervious Area, UA reported in Step 1 for the MS4 that is owned by the permittee **(13)**. If the entered percent is greater than or equal to 20%, a value of 0.5 is assigned. If the percent is greater than or equal to 15% but less than 20%, a value of 0.75 is assigned. If the percent is greater than or equal to 10% but less than 15%, a value of 1 is assigned. If the percent is greater than or equal to 5% but less than 10%, a value of 1.25 is assigned. If the percent is less than 5%, a value of 1.5 is assigned. The higher the percent, the higher the estimated opportunity for SCMs (and the lower the assigned value).
 - **Percent of public impervious that is untreated:** Enter the percent of the publicly owned impervious area (reported in **13**) that is untreated by stormwater SCMs **(14)**. If the entered percent is greater than or equal to 80%, a value of 1.5 is assigned. If the percent is greater than or equal to 60% but less than 80%, a value of 1.25 is assigned. If the percent is greater than or equal to 40% but less than 60%, a value of 1 is assigned. If the percent is greater than or equal to 20% but less than 40%, a value of 0.75 is assigned. If the percent is less than 20%, a value of 0.5 is assigned. The higher the percent, the lower the estimated opportunity for SCMs (and the higher the assigned value).
 - **Localized flooding problem in the municipality?** Indicate (Yes or No) whether there is a localized flooding problem in the municipality **(15)**. If Yes, a value of 0.75 is assigned, otherwise a value of 1 is assigned. If Yes is selected, the permittee should keep on file documentation of localized flooding issues. Relevant documentation may include site photographs, public works maintenance reports, and records of any state or federal level flood mitigation assistance provided within the permittee's jurisdiction.

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- **No. development/redevelopment projects/year:** Report the average number of development and redevelopment projects that have occurred over the previous three years **(16)**. If the number is greater than or equal to 10, a value of 0.5 is assigned. If the number is greater than or equal to 7 but less than 10, a value of 0.75 is assigned. If the number is greater than or equal to 4 but less than 7, a value of 1 is assigned. If the number is greater than or equal to 2 but less than 4, a value of 1.25 is assigned. If the number is less than 2, a value of 1.5 is assigned. The higher the number, the higher the estimated opportunity for SCMs (and the lower the assigned value).
- **Is there an ordinance requiring PCSM < 1 acre?** Indicate (Yes or No) whether there is a local ordinance that requires PCSM for projects with less than 1 acre of disturbance **(17)**. If Yes, a value of 0.75 is assigned, otherwise a value of 1 is assigned.

Feasibility Index: The Feasibility Index is calculated as the product of A through F, where the minimum value is 1. The higher the Feasibility Index, the lower the estimated opportunities for SCMs.

Step 3: Determine MEP

Adjusted Annualized VMO – The Annualized VMO that is determined in Step 1 is divided by the Feasibility Index calculated in Step 2, rounded to the nearest 100 CF/Yr.

Collaboration credit:

- **Number of additional MS4s collaborating in VMP** – Enter the number of additional MS4s collaborating in the development and implementation of the VMP (if any). MS4s that have been granted a waiver may participate in a collaborative VMP as long as the permittee that was granted a waiver completes the MEP Calculator Spreadsheet and the VMO of the waived MS4 is included in the total VMO of the collaborative VMP. A 1% credit is applied for each MS4 that is collaborating, up to a 50% maximum credit. For example, if a VMP is being developed and implemented by 10 MS4s, a 10% credit will be applied. Non-MS4s including but not limited to non-profit organizations, and municipalities that do not need an NPDES permit or waiver, may participate in a collaborative VMP but may not be included in the number of MS4s collaborating in the VMP.
- **Are the collaborating MS4s co-permittees?** As an incentive for those MS4s that are collaborating in the development and implementation of PRPs to also be co-permittees, an additional credit is provided for co-permittees. If the response is Yes, 10% is added to the credit calculated above for the number of additional MS4s collaborating in the VMP. For example, if a VMP is being developed and implemented by 10 MS4s, and they will be co-permittees, an additional 20% credit (10% for the 10 collaborating MS4s + 10% for the 10 MS4s being co-permittees) will be applied.

The collaboration credit is the product of the two credits described above, up to a maximum of 50%. For example, if a VMP is being developed and implemented by 10 MS4s, a 10% credit will be applied and a value of 0.9 is assigned ($1 - 0.1$). If the collaborating MS4s will be co-permittees, a 20% credit will be applied and a value of 0.8 is assigned ($1 - 0.2$). The product of 0.9 and 0.8 is 0.72 or 72%. That product is then subtracted from 100% to calculate the collaboration credit ($100\% - 72\% = 28\%$).

The **MEP Annualized VMO**, in CF/Year, is the Adjusted Annualized VMO minus the collaboration credit, rounded to the nearest 1,000 CF/Yr. The minimum value is 1,000 CF/Year (unless the Volume Management Objective determined in Step 1 is 0). Report this value in the Volume Management Plan section of the NOI.

The **Volume Management Objective for 2026-2031 Permit Term** is two times the MEP Annualized VMO, representing two years' worth of volume management efforts under PAG-13. Report this value in the Volume Management Plan section of the NOI.

SCM Inventory Worksheets

Report all functional and maintained SCMs that treat impervious surfaces within the UA in this worksheet, as long as they are able to capture and treat, through infiltration and/or ET, at least one inch of runoff (including MRC

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SCMs), with certain exceptions. Existing SCMs do not necessarily need to be designed to current DEP standards. The purpose of the SCM Inventory is to establish a baseline of the impervious area treated within the urban area.

NOTE – Users cannot paste into the SCM Inventory Worksheets. Entries must be made manually. DEP has disabled pasting functions to ensure that cell-specific validations are not bypassed.

The qualifications for SCMs to be identified in the SCM Inventory are discussed below.

1. The SCM could have been constructed at any time, for any size project, and regardless of whether the SCM was installed to meet regulatory or permit compliance (such as Chapter 102 Post-Construction Stormwater Management (PCSM), SCMs constructed for Pollutant Reduction Plans (PRPs), etc.).
2. The SCM should have been designed to capture and manage at least one inch of runoff from impervious surfaces in the contributing drainage area. All structural PCSM SCMs implemented for compliance with Chapter 102 can be assumed to meet this criterion. If there is no available information on the design of the SCM, the MS4 may make observations of the SCM during a 1.2-inch/2-hour storm event (producing approximately one inch of runoff from impervious surfaces) or greater to determine whether the SCM qualifies. If there is no overflow from the SCM during or following this storm event, and stormwater recedes to the SCM surface within 72 hours, the SCM qualifies. If it is determined that the SCM qualifies, documentation on how the SCM was evaluated must be kept on file by the permittee and may be requested by DEP.
3. SCMs that capture and manage less than one inch of runoff from impervious surfaces may qualify for the SCM Inventory, but the impervious area treated must be decreased in proportion with the runoff managed. For example, SCMs that treat 10 acres of impervious but only manage 0.1 inch and 0.5 inch of runoff can be identified in the SCM Inventory as treating 1 and 5 acres of impervious, respectively.
4. All SCMs reported in the SCM Inventory must have been inspected by the permittee or owner of the SCM within the past two years (that is, no later than two years prior to submission of the NOI). The SCMs must be considered functional, meaning no significant maintenance or repairs are necessary to manage runoff (or such maintenance or repairs were completed prior to reporting the SCM in the SCM Inventory). SCM design documentation and calculations do not need to be submitted with the MEP Calculator; however, it is expected that permittees will maintain this information on file and update the file when SCMs are inspected. DEP may request additional SCM documentation during review of the NOI or during an inspection. It is recommended that MS4s utilize someone who is trained and experienced in SCM performance to evaluate the functionality of SCMs.
5. Historical street sweeping, inlet or storm drain cleaning, and related non-structural sediment removal activities do not qualify for the SCM Inventory. Street sweeping and inlet or storm drain cleaning may however receive credit for future activities when proposed in a VMP.
6. Wet and dry detention basins designed primarily to reduce peak flow rates generally do not provide a volume management function and do not qualify for reporting in the SCM Inventory. However, retrofits of rate control or flood control SCMs to improve infiltration and/or sediment capture may qualify for the SCM Inventory. Where a retrofit of a rate control or flood control SCM was completed to improve sediment capture or other pollutant removal but did not improve infiltration capabilities, 50% of the impervious area in the SCM's drainage area may be claimed.
7. Vegetated channels and swales designed primary for stormwater conveyance generally do not provide a volume management function and do not qualify for reporting in the SCM Inventory. However, if the design of the swale includes check dams this will increase infiltration and ET. These swales can be reported in the SCM Inventory under the SCM name of "Vegetated Conveyance with Check Dams".
8. Historical soil amendments on individual lots do not qualify for the SCM Inventory unless a certified soil scientist demonstrates through soil characterization testing that the amended soils continue to provide a volume management benefit in relation to soils that have not been amended on the same or adjacent lots. Other on-lot SCMs such as dry wells, rain gardens, rain barrels, etc. may qualify if designed to capture and manage at least one inch of runoff from impervious surfaces.

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9. Stream restoration projects with a floodplain restoration component will qualify for the SCM Inventory. The impervious area treated is that which is within the drainage area of the restored floodplain (that is, contributing stormwater perpendicular to the floodplain within the permittee's jurisdiction), not the drainage area of the surface water at that location.
10. Stream restoration projects without a floodplain restoration component qualify only if these projects accomplished a sediment load reduction exceeding the reduction required under the 2018 PAG-13 General Permit for PRPs. To determine the credit, in terms of area of impervious treated, complete the following calculation and attach documentation to the MEP Calculator Spreadsheet supporting the credit:

$$\text{Stream Restoration Credit (Equivalent Impervious Treated, Acres)} = ((\text{TC} / \text{TR}) \times (\text{TR} - \text{RR})) / \$200,000$$

Where:

TC = Total Cost to implement all PRP projects (provide documentation);

TR = Total Pounds (lbs) of Sediment Reduced for PRP (provide documentation, such as, Final Report);

RR = Required Reduction (lbs) of Sediment for PRP (as identified in the approved PRP).

Note that TC is the total cost to the permittee; any grant funding received towards PRP implementation should not be included in TC.

The calculation uses an estimate of \$200,000 to account for all costs associated with treating one inch of runoff from one acre of impervious surfaces using infiltration and ET. If an MS4 can document a lower cost, its research may be submitted for justification (although DEP will not approve costs lower than \$100,000 per acre).

For example, if an MS4 was required to reduce 500,000 lbs of sediment, and a stream restoration project was implemented that achieved a reduction of 1,000,000 lbs at a cost to the permittee of \$2.5 million (with no grant funds received), the equivalent impervious acres treated would be as follows:

$$((\$2,500,000 / 1,000,000 \text{ lbs}) \times (1,000,000 \text{ lbs} - 500,000 \text{ lbs})) / \$200,000/\text{acre} = 6.25 \text{ acres}$$

SCM Types Worksheet

Check the appropriate boxes to indicate the types of SCMs within the MS4's SCM Inventory. Checking the box activates the corresponding SCM worksheet.

- ☐ Stream Restoration with Floodplain Restoration Component
- ☐ Stream Restoration without Floodplain Restoration
- ☐ Rate/Flood Control Retrofits
- ☐ Infiltration/ET and Other Volume Management SCMs
- ☐ Other SCMs

Floodplain Restoration Worksheet

- Select the number of floodplain restoration projects or locations from the drop-down list ("No. SCMs:").
- Enter the name of the surface water whose floodplain was restored.
- Enter the latitude and longitude coordinates at the center of the restored area, in decimal degrees. Report coordinates to six decimal places. Use a negative ("-") symbol to report longitude.

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- Enter the name of the owner of the project, typically the landowner.
- Enter the restoration area, in acres. Include only the restored floodplain area, not area associated with streambank restoration or stabilization, if completed.
- Select “One” or “Both” from the drop-down menu to indicate the side(s) of the stream that were restored.
- Enter the impervious area that is located within the restored area’s drainage area, perpendicular to the restored floodplain. A validation warning is shown if the value entered exceeds 25 acres. If the value entered is more than two times the size of the restored area, the cell will turn red to indicate that the entered value exceeds the expected treatment capacity of the restored floodplain. DEP may require additional information to justify values in cells highlighted in red.
- Select “Yes” or “No” from the drop-down menu to indicate whether the SCM was installed to comply with Chapter 102 Post-Construction Stormwater (PCSM) requirements for a project site.
- Select the year the SCM was installed (completed) from the drop-down list.
- Select the year the SCM was last inspected from the drop-down list.
- When all data have been entered for a row, and assuming the SCM was inspected within the past 2 years, the impervious areas treated are summed.

Stream Restoration Worksheet

The purpose of this worksheet is to provide an equivalent impervious area treatment credit for stream restoration SCMs that did not include a floodplain restoration component. Only use this worksheet if the MS4 exceeded their sediment reduction objective during the previous permit term using stream restoration (and other SCMs, if applicable). If an MS4 implemented stream restoration project(s) during the previous permit term, but the amount of the sediment load reduction achieved did not exceed the sediment reduction objective of a Pollutant Reduction Plan (PRP), the project(s) should not be reported. See [examples](#) below.

- Enter the name of the surface water whose streambanks were restored.
- Enter the latitude and longitude coordinates at the center of the restored area, in decimal degrees. Report coordinates to six decimal places. Use a negative (“-”) symbol to report longitude.
- Enter the name of the owner of the project, typically the landowner.
- Enter the total cost to the MS4 to implement the PRP (all projects completed for the PRP). Exclude costs that were paid for by grants. Provide documentation to support the value entered.
- Enter the total sediment reduction achieved for all projects implemented under the PRP. This value should be consistent with the value identified in the final report submitted to document PRP implementation activities.
- Enter the total sediment reduction required to meet the objective of the PRP (i.e., minimum 10% reduction in existing sediment load).
- An estimate of \$200,000 per acre of impervious area treated is listed by default. This is considered an average cost to treat impervious area through infiltration and evapotranspiration (ET) throughout the state. If a lower cost per acre is entered, attach documentation to support the lower cost. The lowest value that can be entered is \$100,000.
- The equivalent impervious area treated, in acres, is calculated and displayed once all data have been entered, assuming the SCM has been inspected within the past two years. If the value calculated exceeds 25 acres,

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the cell will be highlighted in red. DEP may require additional information to justify values in cells highlighted in red.

- Select “Yes” or “No” from the drop-down list to indicate whether the stream restoration project was approved by DEP as part of a PRP project.
- Select the year the SCM was installed (completed) from the drop-down list.
- Select the year the SCM was last inspected from the drop-down list.
- When all data have been entered for the row, and assuming the SCM was inspected within the past 2 years, the total equivalent impervious area treated is displayed.

Example 1 – The sediment load reduction objective in a PRP is 100,000 lbs. One stream restoration project is completed on Blue Stream at a cost to the MS4 of \$212,000 and resulted in a sediment reduction of 100,000 lbs. Since the sediment load reduction objective of the MS4’s PRP was not exceeded, this SCM should not be identified in the SCM Inventory.

Example 2 – The sediment load reduction objective in a PRP is 100,000 lbs. One stream restoration project is completed on Blue Stream at a cost to the MS4 of \$393,000 and resulted in a sediment reduction of 150,000 lbs. The equivalent impervious treated is determined to be 0.66 acre.

Surface Water Name	Latitude	Longitude	Owner Name	Total MS4 Cost to Implement PRP (\$)	Total Sediment Reduced for PRP (lbs)	Total Sediment Reduction Required (lbs)	Impervious Treatment Cost Estimate (\$/ac)	Equivalent Impervious Treated (ac)	Approved in PRP?	Year Installed	Year Last Inspected
Blue Stream	42.219921	-77.568212	Park Township	\$393,000	150,000	100,000	\$200,000	0.66	Yes	2022	2024
TOTAL:								0.66			

Example 3 – An MS4 decides to implement two projects for its PRP; one involves the retrofit of a flood control basin and the other involves stream restoration on Muddy Creek. The sediment load reduction objective for the PRP is 300,000 lbs. Both the retrofit and stream restoration projects result in a sediment load reduction of 200,000 lbs (each) and the total cost to the MS4 of \$725,000. The equivalent impervious treated is determined to be 0.91 acre.

Surface Water Name	Latitude	Longitude	Owner Name	Total MS4 Cost to Implement PRP (\$)	Total Sediment Reduced for PRP (lbs)	Total Sediment Reduction Required (lbs)	Impervious Treatment Cost Estimate (\$/ac)	Equivalent Impervious Treated (ac)	Approved in PRP?	Year Installed	Year Last Inspected
Muddy Creek	40.901020	-76.299200	Eagles Eye Golf Course	\$725,000	400,000	300,000	\$200,000	0.91	Yes	2023	2024
TOTAL:								0.91			

Example 4 – An MS4 decides to implement two stream restoration projects for its PRP. The sediment load reduction objective for the PRP is 1,000,000 lbs. The restoration project on Clear Run cost \$584,000 to the MS4 and resulted in a sediment load reduction of 698,000 lbs. The restoration project on Little River cost \$845,000 overall, resulting in a sediment load reduction of 861,000 lbs. Fifty percent (50%) of the Little River project was paid for by the MS4. The Little River project was most recently completed and will be reported in the table. The equivalent impervious treated is determined to be 1.8 acres.

Surface Water Name	Latitude	Longitude	Owner Name	Total MS4 Cost to Implement PRP (\$)	Total Sediment Reduced for PRP (lbs)	Total Sediment Reduction Required (lbs)	Impervious Treatment Cost Estimate (\$/ac)	Equivalent Impervious Treated (ac)	Approved in PRP?	Year Installed	Year Last Inspected
Little River	41.865220	-77.945221	Little River Fish & Game	\$1,006,500	1,559,000	1,000,000	\$200,000	1.80	Yes	2023	2024
TOTAL:								1.80			

Retrofits Worksheet

The Retrofits worksheet is intended for MS4s to report rate or flood control SCMs that were modified as a PRP project or for other purposes to improve infiltration capabilities and/or pollutant reductions. Do not report SCMs that were installed for Chapter 102 PCSM rate control purposes or other existing flood control basins that were not modified to improve infiltration and/or water quality treatment.

- Select the number of retrofit SCMs from the drop-down list ("No. SCMs:").
- Enter the name of the SCM as it is known locally. For example, "10th Street Flood Control Basin Retrofit".
- Enter the latitude and longitude coordinates at the center of the SCM, in decimal degrees. Report coordinates to six decimal places. Use a negative ("-") symbol to report longitude.
- Enter the name of the owner of the project, typically the landowner.
- Select the type of retrofit from the dropdown menu. Select "Infiltration and Water Quality Improvements" if the height of the lowest orifice was increased and soils were amended to enhance infiltration capabilities (preferably deep-rooted vegetation would also have been established). Select "Water Quality Improvements" if the height of the lowest orifice was not increased and/or a channel within a basin was removed to promote sheet or shallow concentrated flow rather than concentrated flow through the basin (preferably deep-rooted vegetation would also have been established).
- Describe the retrofits made in the space provided. Alternatively attach a more thorough description of the retrofits.
- Enter the SCM surface area, in square feet (SF). Include the bottom of the SCM only (not side slopes).
- Enter the depth to the lowest orifice within the SCM, in feet, measured from the SCM bottom to the invert of the first outlet. If the value is zero, enter "0.001". The value must be less than 10 feet. If the value exceeds 5 feet, the cell will be highlighted in red. DEP may require additional information to justify values in cells highlighted in red.
- Enter the SCM storage volume in CF. In general, the storage volume is the product of the depth to the lowest orifice and the SCM surface area. If the value exceeds 125% of the product of the depth to the lowest orifice and the SCM surface area, the cell is highlighted red and calculations should be attached to show how storage volume was computed.
- The area of impervious treated by the SCM is determined by the SCM storage volume that is entered. The storage volume is divided by a factor of 3,630 CF/acre to determine acres in which 1 inch of runoff is treated (43,560 ft²/acre x 1 ft/12 inches x 1 inch runoff).
- Select "Yes" or "No" from the drop-down menu to indicate whether the SCM was installed to comply with Chapter 102 PCSM requirements for a project site.
- Select the year the SCM was installed (completed) from the drop-down list.
- Select the year the SCM was last inspected from the drop-down list.
- When all data have been entered for a row, and assuming the SCM was inspected within the past 2 years, the impervious areas treated are summed.

Volume SCMs

The Volume SCMs worksheet is used to report SCMs that have an infiltration, ET, or volume management function. Table 1 presents a list of SCMs that can be selected for this worksheet. Table 1 includes a crosswalk between the

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SCM Names in the Volume SCMs worksheet and Chesapeake Bay Program best management practices (BMPs), which may have been used by MS4s for BMP inventories.

Note that wet and dry detention/retention basins are not in the drop-down list because they do not provide appreciable volume management benefits. However, naturalized detention basins, which are constructed similarly to a surface infiltration basin and have deep-rooted vegetation to promote ET, can be reported in the SCM Inventory (select Surface Infiltration Basin as the SCM name). Wet and dry detention/retention basins (i.e., rate and flood control basins) that are modified to provide infiltration and ET or water quality benefits should be reported in the Retrofits worksheet.

Table 1: SCMs Available in Volume SCMs Worksheet with Chesapeake Bay BMP Crosswalk

Volume SCMs	Equivalent Chesapeake Bay BMPs
Bioinfiltration	Bioretention/raingardens - A/B soils, no underdrain
Bioretention ¹	Bioretention/raingardens - all soils, underdrain
Engineered Stormwater Treatment Wetland	Wetland Creation – Floodplain or Headwater
Green Roof	N/A
Infiltration Trench	Infiltration Practices with and without Sand, Veg. - A/B soils, no underdrain
Managed Release Concept (MRC) SCM ¹	Bioretention/raingardens – all soils, underdrain
Permeable Pavement	Permeable Pavement with or without Sand, Veg. - all soils, with or without underdrain
Regenerative Step Pool Systems	N/A
Retentive Grading	Infiltration Practices with and without Sand, Veg. - A/B soils, no underdrain
Riparian Buffer	Forest Buffer
Stormwater Capture and Use	N/A
Surface Infiltration Basin	Infiltration Practices with and without Sand, Veg. - A/B soils, no underdrain
Underground Infiltration Basin	Infiltration Practices with and without Sand, Veg. - A/B soils, no underdrain
Vegetated Filter Strip	Bioswale, Filter Strip Stormwater Treatment, Filter Strip Runoff Reduction
Vegetated Conveyance with Check Dams	Bioswale, Filter Strip Stormwater Treatment, Filter Strip Runoff Reduction

¹ Select MRC if the design includes an internal water storage (IWS) zone, typically created by the use of an upturned elbow on the underdrain, otherwise select Bioretention.

- Select the number of Volume SCMs from the drop-down list ("No. SCMs:").
- Select the name of the SCM from the drop-down list. If assistance is needed in selecting SCM Names, contact DEP's Bureau of Clean Water at RA-EPPAMS4@pa.gov.
- Enter the latitude and longitude coordinates at the center of the SCM, in decimal degrees. Report coordinates to six decimal places. Use a negative ("-") symbol to report longitude.
- Enter the name of the owner of the project, typically the landowner.

Enter the SCM surface area, in square feet (SF), between 1 and 87,120 SF (2 acres). Include the bottom of the SCM only (not side slopes). For riparian buffers, enter only the area associated with buffers that have been designed, implemented and are being maintained as SCMs. Do not report existing vegetated areas adjacent to streams that were not implemented as SCMs.

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- Enter the depth to the lowest orifice within the SCM, in feet, measured from the SCM bottom to the invert of the first outlet. If the value is zero, enter "0.001". The value must be less than 10 feet. If the value exceeds 5 feet, the cell is highlighted in red. DEP may require additional information to justify values in cells highlighted in red.

For SCMs without a designed outlet structure (e.g., infiltration trenches, vegetated filter strips, retentive grading, etc.), enter a value corresponding to the height at the top of berm or grade.

- Enter the SCM storage volume in CF. In general, the storage volume is the product of the depth to the lowest orifice and the SCM surface area. If the value exceeds 125% of the product of the depth to the lowest orifice and the SCM surface area, the cell is highlighted red and calculations should be attached to show how storage volume was computed.
- The area of impervious treated by the SCM is determined by the SCM storage volume that is entered. The storage volume is divided by a factor of 3,630 CF/acre to determine acres in which 1 inch of runoff is treated ($43,560 \text{ ft}^2/\text{acre} \times 1 \text{ ft}/12 \text{ inches} \times 1 \text{ inch runoff}$).
- Select "Yes" or "No" from the drop-down menu to indicate whether the SCM was installed to comply with Chapter 102 PCSM requirements for a project site.
- Select the year the SCM was installed (completed) from the drop-down list.
- Select the year the SCM was last inspected from the drop-down list.
- When all data have been entered for a row, and assuming the SCM was inspected within the past 2 years, the impervious areas treated are summed.

Other SCMs Worksheet

This worksheet is used for SCMs that have a different method to calculate impervious area treated and includes tree planting and impervious area reduction. Other SCMs may be added in the future.

- **Tree Planting** – a volume management credit is provided for tree plantings since 2018 as follows:
 - 3 CF for every new native tree that is planted within an urban area with a caliper (the diameter at breast height of a tree) of less than 2 inches;
 - 6 CF for every new native deciduous tree that is planted within an urban area with a caliper of 2 inches or more; and
 - 6 CF for every new native evergreen tree with a height of at least 6 feet.

If the number of trees entered exceeds 300, the cell is highlighted red. DEP may require additional information to justify values in cells highlighted in red. The volume management credit is summed and divided by a factor of 3,630 to determine the equivalent impervious area treated in acres.

MS4s do not need to submit location, ownership, and inspection information for each tree listed on the Other SCMs worksheet; however, it is expected that permittees will keep this information on file and ensure that any trees that die are replaced or removed from the Tree Planting inventory. DEP may request this documentation during review of the NOI or during an inspection.

- **Impervious Area Reduction** – The change in land cover results in less runoff, which is quantified as a volume reduction and converted to equivalent impervious treated for one inch of runoff.
 - Enter the area converted from impervious to pervious within the urban area since 2018.

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- Select a Hydrologic Soil Group (HSG) from the drop-down list for the **land cover**. Soil groups are based on NRCS' National Engineering Handbook ([Chapter 7, Hydrologic Soil Groups](#)). The [NRCS Web Soil Survey](#) tool may be used to characterize soils present at a site (instructions on using the Survey tool to determine HSG are available – [use this link](#)); preferably a certified soil scientist will verify the HSG. For soils assigned dual soil groups (e.g., A/D, B/D, etc.), use the first group for your selection.
- The runoff volume reduction at the 1.2-inch/2-hour storm (i.e., a storm that results in one inch of runoff) is estimated assuming that the new land cover is "Open Space in Good Condition".
- The runoff volume reduction is converted to an equivalent impervious area treated by dividing by a factor of 3,630.

Volume Management Chart

This chart is used to determine the Volume Management Objectives for MS4s. The Volume Management Objectives have been calculated as follows:

- The long-term goal of MS4 Volume Management Plans is the treatment of 88% of impervious surfaces (i.e., only 12% of impervious surfaces are untreated). This goal is based on numerous studies estimating surface water degradation as a function of impervious area. See, for example, [Impervious Surfaces and Water Quality: A Review of Current Literature and Its Implications for Watershed Planning](#). Based on consideration of these studies, DEP believes that the control of stormwater to a level equivalent to 12% (or less) imperviousness throughout a watershed or sub-watershed will, in most cases, result in attainment of state water quality standards. The 12% threshold has been used by DEP in other contexts including the PAG-01 General Permit for Discharges of Stormwater Associated with Small Construction Activities.
- The first step in calculating the Volume Management Objective is to find the total untreated impervious area, i.e., the difference between 88% treatment and the existing level of treatment. The midpoint of the range of total impervious and percentage of impervious area treated is used for the calculation.

Example – An MS4 selects the range "100-199" for total impervious area in the UA and "6-10%" is calculated for the percentage of impervious area treated, based on the MS4's SCM Inventory. The untreated impervious area is determined as follows:

$$(150 \times 0.88) - (150 \times 0.08) = 120 \text{ acres untreated}$$

- Untreated impervious area is to be treated over 50 years, i.e., 2% per year. For the 120 acres that are untreated in the example above, each year 2.4 acres would need to be treated (120 acres x 0.02).
- To determine the equivalent volume for the annual impervious to be treated, one inch of runoff is used. One inch of runoff from one impervious acre equals 3,630 CF of volume. For the 2.4 acres that would need to be treated in the example above, 8,712 CF of runoff would need to be treated each year (rounded up to 9,000 CF).

Revision History

Date	Version	Revision Reason
1/2025	1.0	Draft

DRAFT

LOWER PAXTON TOWNSHIP AUTHORITY
Budget-Actual Comparison Reports -
Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account NumberAccount Title		2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+/(-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
OPERATING REVENUES:								
36-3001-341.01	Interest Earnings	\$ 1,189,109	\$ 850,000	\$ 339,109	140%	\$ 945,448	3782%	Anticipated decline in rates did not occur as swiftly as expected in budget, and invested balances were stable/improving most of the year.
36-3001-364.10	Sewer - Rent Charges	17,174,964	17,200,000	(25,036)	100%	17,347,788	108%	Overall revenues down by approx. 1% over prior year (no fee changes and limited growth), which included some adjustments for Q4 billing corrections after issuance; consistent with conservative budget mark.
36-3001-364.11	Sewer - Tapping Fees	277,105	300,000	(22,895)	92%	295,889	69%	Sluggish in early period, but rebounded late with settling inflation/interest rates to aid permits/construction.
36-3001-364.12	Sewer - Misc Reimbursements	70,402	94,584	(24,182)	74%	20,977	19%	Primarily for developer escrow reimbursements and shared service reimbursements from municipal partner groups (slightly less than anticipated, due to delays in CRW
36-3001-391.10	Proceeds - Sales of Fixed Assets	-	-	-	0%	540,987	0%	Prior year excess land sale, per Board approval.
36-3001-393.10	Proceeds - Debt Issuance - Operations	240,231	-	240,231	0%	946,769	0%	Represents final PennVest reimbursement draws.
TOTAL SEWER FUND REVENUES		18,951,811	18,444,584	507,227	103%	20,097,857	119%	
OPERATING EXPENDITURES:								
36-4400-429.300	Supp & Admin - Office Supplies	25,182	27,150	1,968	93%	30,247	80%	Reduced from prior year due to mid-2023 expenses shift for solid waste/recycling billing and collection operation implementation.
36-4400-429.306	Supp & Admin - IT Supplies	696	250	(446)	278%	1,839	0%	
36-4400-429.310	Supp & Admin - Bank Fees	5,118	8,905	3,787	57%	15,361	93%	Includes bond fees charged during year; continue fee-free auto-ACH services, and pass-through online charges.
36-4400-429.312	Supp & Admin - Advertising	2,106	1,000	(1,106)	211%	1,853	46%	Included project advertisement for PC-2E/2F bids.
36-4400-429.314	Supp & Admin - Postage	15,929	17,000	1,071	94%	14,895	62%	Consistent with budget, including recent USPS increases, but slightly down for consolidating delinquent reporting process.
36-4400-429.322	Supp & Admin - Training/Seminars	12,281	9,500	(2,781)	129%	12,253	111%	High for new-hire CDL training .
36-4400-429.500	Prof Svcs - Solicitor & Debt Collection	74,570	125,000	50,430	60%	110,908	61%	Limited delinquency and lien activity/assistance from Solicitor and Collection Agent in Q1/Q2, and change in collections process made in early Q3 removed most fees 2025/further; new Solicitor placed in October .
36-4400-429.510	Prof Svcs - Engineering Services	166,759	163,000	(3,759)	102%	148,967	110%	Spiked for increased CRW rate/contract support.
36-4400-429.512	Prof Svcs - CRW Rate Services	6,328	60,000	53,672	11%	2,491	0%	Includes support for rate study and database assessments, including CRW rates/contracts (to be partially offset with reimbursement revenue above from other municipal partners, as billed), which push to 2025 due to slow progress on negotiations.
36-4400-429.520	Prof Svcs - Accounting & Auditing	8,240	8,240	-	100%	8,360	76%	
36-4400-429.521	Prof Svcs - Contracted Labor	4,350	14,500	10,150	30%	787	0%	Temporary staff position, currently held vacant (evaluation ongoing for future full-time need or other staff changes).
36-4400-429.530	Prof Svcs - Township Management Admin Reimbursements	441,421	470,198	28,777	94%	2,521,865	83%	2024/further segregation below for field labor ; otherwise, comparable to prior year and consistent with budget in total.
36-4400-429.535	Prof Svcs - Township Admin Rents	34,432	44,350	9,918	78%	43,029	104%	2024/further segregation below for facilities program rents ; otherwise, comparable to prior year and consistent with budget in total.
36-4400-429.542	Prof Svcs - IT Subscriptions/Licenses	58,922	60,000	1,078	98%	52,237	177%	

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Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account Number	Account Title	2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+/(Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
36-4400-429.570	Prof Svcs - Copier Maintenance Contracts	4,040	5,750	1,710	70%	6,880	0%	Reduced from prior year/budget through newly negotiated contracts.
36-4400-429.598	Prof Svcs - Communications & Newsletter Services	8,770	9,240	470	95%	8,085	0%	Shared allocation for third-party communications management services (<i>previously in Management Reimbursements above</i>).
36-4400-429.670	Utilities - Telephone & Alarm	20,553	24,500	3,947	84%	23,817	74%	Reduced for review and modifications to service needs.
36-4400-486.730	Misc - Liability & Casualty Insurances	34,718	44,100	9,382	79%	49,795	128%	Reflects a number of reduced premium costs for specific coverage lines, and additional cost shift to stormwater due to labor divisions.
Administration - General Services Expenditures Subtotal		924,416	1,092,683	168,268	85%	3,053,669	84%	
36-4405-429.302	Supp & Admin - Building Supplies	3,480	8,000	4,520	43%	7,537	30%	<i>Shift in reporting for facilities maintenance below.</i>
36-4405-429.326	Supp & Admin - Uniforms	4,570	4,000	(570)	114%	9,915	117%	Estimate for union allowance use slightly low versus actual.
36-4405-429.352	Supp & Admin - Small Tools/Equipment	4,873	10,000	5,127	49%	7,336	293%	<i>Shift in reporting for facilities maintenance below.</i>
36-4405-429.400	R&M - Facilities Maintenance	9,091	-	(9,091)	0%	2,715	0%	Allocated share of door replacement, fire pit valve replacement, and other minor maintenance for sewer operations facility.
36-4405-429.402	R&M - Pump Station Maintenance	8,690	30,000	21,310	29%	23,709	79%	
36-4405-429.420	R&M - Vehicle Maintenance	18,444	15,000	(3,444)	123%	31,413	262%	High for several vehicle incidents, less insurance offsets.
36-4405-429.460	R&M - Sewer Line Maintenance	99,906	40,000	(59,906)	250%	49,444	0%	Approx. \$36,000 for Rogele emergency contract work (including Kalla Drive 20' broken pipe, and force main break repair at Colonial Road Pumping Station), and \$14,137 for stock manhole supplies for various jobs.
36-4405-429.530	Prof Svcs - Township Management Program Reimbursements	1,850,550	1,906,500	55,950	97%	-	0%	<i>2024/further segregation of field labor from office labor.</i>
36-4405-429.535	Prof Svcs - Township Program Rents	9,600	-	(9,600)	0%	-	0%	<i>2024/further segregation of Public Works facilities rents/reimbursements.</i>
36-4405-429.572	Prof Svcs - Cleaning Services	1,000	-	(1,000)	0%	-	0%	Cleaning services outsourced mid-2024 (reduced Township Program Reimbursements from prior part-time staff).
36-4405-429.579	Prof Svcs - Enterprise Vehicle Leases	97,328	60,000	(37,328)	162%	88,294	66%	Total Sewer/Stormwater lease charges in line (and less than) with budget; <i>budget allocation incorrect</i> .
36-4405-429.581	Prof Svcs - DEP/Related Fines	6,250	4,500	(1,750)	139%	3,000	50%	Multiple overflows due to significant January 9th weather event.
36-4405-429.582	Prof Svcs - PA One Call Services	38,557	40,000	1,443	96%	37,459	39%	
36-4405-429.588	Prof Svcs - PennDOT Expenses	794	2,000	1,207	40%	4,076	12%	
36-4405-429.600	Utilities - Vehicle Fuel	23,835	35,000	11,165	68%	28,519	89%	
36-4405-429.610	Utilities - Electric	3,521	4,000	479	88%	4,410	73%	
36-4405-429.612	Utilities - Electric - Pumps	17,412	25,000	7,588	70%	18,292	76%	
36-4405-429.620	Utilities - Natural Gas	2,372	4,800	2,428	49%	7,256	132%	Greatly reduced rate for 2025 contract, and credit applied from last year.
36-4405-429.630	Utilities - Water	5,338	5,200	(138)	103%	5,807	83%	
36-4405-429.632	Utilities - Water - Pumps	1,324	4,000	2,676	33%	1,639	33%	
36-4410-429.560	Prof Svcs - Swatara Transmission/Treatment	2,019,050	2,300,000	280,950	88%	1,769,322	137%	
36-4410-429.562	Prof Svcs - Swatara Flow Surcharges	22,453	30,000	7,547	75%	9,637	19%	Significant in Q1, due to January 9th weather event.
36-4410-429.564	Prof Svcs - CRW Transmission/Treatment	3,608,902	4,000,000	391,098	90%	4,163,992	116%	Reflects all billings and accruals based on Township-initiated payments (at 2023 rates), reduction for amounts held by CRW in excess of costs (as reserve), and increase for disputed amounts and 2023-2024 rate differential accrued for audit (<i>roughly \$ 557,000</i>)

LOWER PAXTON TOWNSHIP AUTHORITY
Budget-Actual Comparison Reports -
Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account Number	Account Title	2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+ / (-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
36-4410-429.566	Prof Svcs - Paxtang Transmission	9,788	14,000	4,213	70%	12,361	88%	
Sewer Operations & Transmission Expenditures Subtotal		7,867,127	8,542,000	674,874	92%	6,286,130	117%	
36-4700-471.800	Debt - Principal - Capital Leases	-	-	-	0%	17,788	0%	No current capital leases.
36-4700-471.817	Debt - Principal - 2014 Bonds	570,000	570,000	-	100%	550,000	108%	All bond principal paid in April.
36-4700-471.818	Debt - Principal - 2015 Bonds	1,845,000	1,845,000	-	100%	1,735,000	17350%	
36-4700-471.819	Debt - Principal - 2016 Bonds	590,000	590,000	-	100%	570,000	109%	
36-4700-471.820	Debt - Principal - 2019 PennVest Loan	579,156	622,500	43,344	93%	604,434	0%	Monthly payments.
36-4700-471.822	Debt - Principal - 2019 Bonds	210,000	210,000	-	100%	235,000	96%	
36-4700-471.823	Debt - Principal - 2020A Bonds	535,000	535,000	-	100%	520,000	103%	
36-4700-471.826	Debt - Principal - 2020C Bonds	335,000	335,000	-	100%	330,000	93%	
36-4700-471.827	Debt - Principal - 2022 Bonds	470,000	470,000	-	100%	455,000	0%	
36-4700-472.800	Debt - Interest - Capital Leases	-	-	-	0%	799	0%	No current capital leases.
36-4700-472.817	Debt - Interest - 2014 Bonds	66,035	66,035	-	100%	88,435	71%	All bonds interest paid semi-annually.
36-4700-472.818	Debt - Interest - 2015 Bonds	339,875	339,875	-	100%	411,475	92%	
36-4700-472.819	Debt - Interest - 2016 Bonds	337,281	337,281	-	100%	360,481	89%	
36-4700-472.820	Debt - Interest - 2019 PennVest Loan	172,629	160,000	(12,629)	108%	165,325	82%	Monthly payments.
36-4700-472.822	Debt - Interest - 2019 Bonds	1,513,650	1,513,650	-	100%	1,522,550	99%	
36-4700-472.823	Debt - Interest - 2020A Bonds	944,850	944,850	-	100%	955,400	98%	
36-4700-472.826	Debt - Interest - 2020C Bonds	762,759	762,758	(1)	100%	765,537	104%	
36-4700-472.827	Debt - Interest - 2022 Bonds	177,200	177,200	-	100%	193,425	0%	
36-4700-472.828	Debt - Interest - 2024 Bonds	415,083	437,575	22,492	95%	-	0%	
Debt Service Expenditures Subtotal		9,863,518	9,916,724	53,206	99%	9,480,650	110%	
TOTAL SEWER FUND OPERATING EXPENDITURES		18,655,061	19,551,407	896,346	95%	18,820,448	107%	
NET OPERATING CHANGE IN RESERVES		\$ 296,749	\$ (1,106,823)	\$ 1,403,572		\$ 1,277,409		
OPERATING CASH BALANCES (Estimated)		\$ 23,938,339				\$ 21,062,071		

CAPITAL REVENUES:								
36-3900-341.04	Interest Earnings - PLGIT Bonds	\$ 467,456	\$ 354,000	\$ 113,456	132%	\$ 367,899	244%	Includes protective estimate of arbitrage (excess) earnings on 2024 bond, pending March 2025 spending test (based on project progress, except to not meet the exception and thus have future rebate requirement).
36-3900-351.04	Federal - Sewer Grants	-	-	-	0%	-	0%	
36-3900-354.04	State - Sewer Grants	1,000,000	1,000,000	-	100%	-	0%	State grant towards PC-3 improvements project below, accrued (actual submission in Q1 2025).
36-3900-392.01	Transfers In - Township Capital Funds	545,991	-	545,991	0%	150,912	0%	Reflects year-end accruals for Township-awarded grants, passed through to Authority, for the Pc-3 project (construction, after CFA grant accounted for above).
36-3900-393.10	Proceeds - Debt Issuance - Capital	15,907,603	16,165,000	(257,397)	98%	-	0%	Budgeted for additional PennVest 2019 loan draws (above in Operations actual) and 2024 bond issuance.
TOTAL SEWER FUND CAPITAL REVENUES		17,921,050	17,519,000	402,050	102%	518,811	345%	
CAPITAL EXPENDITURES:								
36-4700-475.880	Debt - Issuance Costs	201,357	200,000	(1,357)	101%	-	0%	Costs associated with 2024 bond issuance; comparable with budget.

LOWER PAXTON TOWNSHIP AUTHORITY
Budget-Actual Comparison Reports -
Sewer Fund (36)
For the Year Ended December 31, 2024 (PRELIMINARY) and 2023

Account Number	Account Title	2024				2023		Notes/Remarks
		Actual (thru 12/31/24)	Adopted Budget	+ / (-) Variance	Percent of Budget	Actual (thru 12/31/23)	Percent of Budget	
36-4800-429.940	Capital - Paxton Creek Act 537 Improvements	-	500,000	500,000	0%	-	0%	Paxton Creek North Branch Susquehanna Project bid early 2023 (Susquehanna to bill Township respective project cost share, anticipated in 2025 at \$700,000).
36-4800-429.941	Capital - Beaver Creek Act 537 Improvements	1,115,640	-	(1,115,640)	0%	-	0%	\$1.1 million change order and engineer-estimated contingency for completion of Swatara Authority Dryer Project for Township capacity share of costs.
36-4900-429.910	Capital - Equipment Purchases	72,289	67,500	(4,789)	107%	41,124	5%	Cost share for mobile inspection system (portable TV camera) and additional message board for construction sites (unbudgeted).
36-4900-429.920	Capital - Facilities Improvements	29,920	40,000	10,080	75%	-	0%	Allocated share of completed HVAC improvements at Sewer Operations facility.
36-4900-429.940	Capital - Engineering GIS	6,527	75,000	68,473	9%	342	3%	Staff and intern GIS support greatly expanded, reducing need for engineer support.
36-4900-429.941	Capital - Engineering Data Analysis	110,035	80,000	(30,035)	138%	106,732	91%	Includes meter site tool/subscription costs.
36-4900-429.942	Capital - Enigneering Meetings & Reporting	39,664	30,000	(9,664)	132%	30,482	85%	
36-4900-429.943	Capital - Mainline Repairs	347,937	275,000	(72,937)	127%	148,731	57%	Estimated annual maintenance and main line sewer repairs necessary in system, with minor engineering support; <i>spike in Q4 for sewer portion of Township 2024 paving project work (\$228,000), modestly higher than budget expectation</i> .
36-4900-429.944	Capital - Metering	32,234	45,000	12,766	72%	55,576	65%	Metering data, maintenance, and replacement costs relative to sewer flow monitoring.
36-4900-429.951	Capital - PC-2 Sewer Improvements	153,414	2,275,000	2,121,586	7%	36,194	0%	Anticipated \$1,900,000 construction, \$50,000 engineering, and \$250,000 for lateral repairs/related costs; <i>majority shifting to 2025 due to late 2024 contract start</i> .
36-4900-429.952	Capital - PC-3 Sewer Improvements	2,175,539	5,225,000	3,049,461	42%	403,852	0%	Continuation of PC-3E project, with 50% construction budgeted in 2024 (\$5,165,000 construction and \$60,000 engineering); <i>majority shifting to 2025</i> .
36-4900-429.961	Capital - BC-2/5 Sewer Improvements	2,232	-	(2,232)	0%	126,707	1%	BC-2A/B/C and BC-5B sewer improvement projects completed early 2023.
36-4900-429.966	Capital - BC-7 Sewer Improvements	3,281,838	4,170,400	888,562	79%	10,202,727	2915%	Beaver Creek BC-7 Project started in July 2022 (delayed), with significant construction in 2023/2024, with completion early 2025 (\$4,000,400 construction and \$170,000 engineering); <i>minor completion costs in 2025</i> .
36-4900-429.971	Capital - SC-2 Sewer Improvements	-	-	-	0%	174,876	8%	
36-4900-429.981	Capital - Red Top Rd Bridge Sewer	-	-	-	0%	158,854	0%	Final close-out billing for sewer relocation costs and allocated project engineering, mostly matched with grant funding (above).
36-4900-429.530	Prof Svcs - Sewer PW Capital Management Reimbursements	7,492	-	(7,492)	0%	-	0%	Share of Public Works wages/benefits relative to paving support for various Mainline Repairs projects (above).
TOTAL SEWER FUND CAPITAL EXPENDITURES		\$ 7,576,118	\$ 12,982,900	\$ 5,406,782	58%	\$ 11,486,197	64%	
NET CAPITAL CHANGE IN RESERVES		\$ 10,344,931	\$ 4,536,100	\$ (5,004,732)		\$ (11,430,620)		
CAPITAL CASH BALANCES (Estimated)		\$ 11,862,482				\$ 2,881,693		
TOTAL SEWER FUND EXPENDITURES		\$ 26,231,180	\$ 32,534,307	\$ 6,303,127	81%	\$ 30,306,645	85%	
NET TOTAL SEWER FUND CHANGE IN RESERVES		\$ 10,641,681	\$ 3,429,277	\$ 7,212,404		\$ (9,689,977)		
OPERATING & CAPITAL CASH BALANCES (Estimated)		\$ 35,800,822				\$ 23,943,765		



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STORMWATER ENGINEER'S REPORT

LOWER PAXTON TOWNSHIP/AUTHORITY

Attn: Bradley Gotshall
Report Period: 11/27/24 – 02/25/25
HRG Project Number: R004807.0435

February 25, 2025

MS4 – TECHNICAL ASSISTANCE:

- HRG assigned tasks by LPT
 - MS4 Annual Reporting
 - A summary of activities required for the 2024-2025 MS4 Permit Year are provided below:
 - > **MCM-1:** The Township continues to exceed Public Education and Outreach requirements by publishing multiple stormwater related newspaper & newsletter articles, maintaining the Township's stormwater management website, and posting stormwater related information at the municipal building. Such material is periodically collected for inclusion in the Township's MS4 Annual Report.
 - > **MCM-2:** The Township met the MS4 permit requirements by holding at least one stormwater related public meeting during the 5-year permit term. The monthly Stormwater Authority meetings are open to the public to participate. The Township also solicited public input on the revised PRP as required. Stream cleanup activities and other examples of public involvement from community organizations, like the Paxton Creek Watershed and Education Association (PCWEA), are documented. Lower Paxton Township Engineering Technician, Larry Stepansky, was appointed as PCWEA President for 2025.
 - > **MCM-3:** The Township continues to meet permit requirements by maintaining an updated GIS based map of the stormwater collection and conveyance system. HRG is currently performing required outfall screenings in the Paxtonia and Union Deposit Road areas utilizing the Survey 123 mobile app. The Township continues to provide spill and sanitary sewer overflow reports to HRG for inclusion in the annual MS4 report.
 - > **MCM-4:** The Township continues to meet permit requirements by conforming to the conditions of the Memorandum of Understanding held with the Dauphin County Conservation District as it relates to implementation of the NPDES PAG-02 permitting program for construction activities. HRG also provides documentation on construction observation reports that E&S controls are installed and being maintained.

- > **MCM-5:** Similar to MCM-4, the Township continues to meet permit requirements by conforming to the conditions of the Memorandum of Understanding held with the Dauphin County Conservation District as it relates to implementation of the NPDES PAG-02 permitting program for construction activities. HRG continues to document the installation of Post Construction Stormwater Measures (PCSMs) on new land development projects. HRG conducts routine and complaint driven inspections of PCSMs to document their functionality. Identified deficiencies are reported to the Township for coordination of necessary maintenance/repairs.
- > **MCM-6:** The Township continues to meet permit requirements by providing Township Public Works and Sewer Authority staff annual MS4 training. The Township continues to maintain an inventory of all municipal activities, facilities, and operations that have the potential to contribute to stormwater pollution as required by their MS4 Permit. The annual MS4 training for municipal staff required by the permit will be provided prior to the June 30, 2025, permit year deadline.

- Individual MS4 Permit renewal.
 - HRG submitted the Notice of Intent (NOI) and accompanying documentation for the MS4 permit renewal to PA DEP prior to the February 1, 2025, deadline. DEP has acknowledged its receipt.
- HRG's understanding of LPT tasks being completed in-house.
 - Continue coordinating with HRG, GHD, and the Township's GIS Manager on GIS mapping efforts.

MS4 – JOINT POLLUTANT REDUCTION PLAN (PRP) (PAXTON CREEK COLLABORATIVE - CRW, LPT, ST):

- PennDOT Partnership Program Management
 - RES is substantially complete with construction activities for the Stray Winds Park stream restoration project, which is the last PRP project on the current schedule. Final restoration of the park's turf will be complete in the Spring.

OUTSTANDING PROPOSALS:

- None.

DESIGN PROJECT STATUS:

- Friendship YMCA Stormwater Basins Water Quality Retrofit Project {HRG #R004807.0451}
 - HRG coordinated with Authority staff to bid the project. The project is currently out to bid with a bid opening date of February 26, 2025.
 - HRG and LPTA staff met on February 4th to review the scope of the permit and sampling requirements. LPTA contracted ALS to provide sampling and lab services for the required permitting water parameters. After sampling results are received, and if directed by LPTA, HRG will proceed with preparation and submission of the NPDES Minor Industrial Waste Facilities Permit not covered by ELG.

- Conway Road Fill Site NPDES Permitting {HRG #R004807.0449}
 - NPDES Renewal and Amendment have been approved by DCCD.
 - HRG is currently coordinating with DOLI to incorporate the field changes established by the NPDES Amendment.
- George Park Stormwater BMP Project {HRG #R004807.0455}
 - HRG provided the final construction plans to LPTA staff on 11/4.
- Melbourne Drive and Surrounding Area Drainage Improvements {HRG #R000184.0555}
 - HRG completed the survey and basemapping for the expanded project area. SUE Level B has been completed. HRG provided test pitting location to LPTA. HRG is in the process of updating the preliminary design in the expanded project area.
- Colonial Park Stormwater Improvements Project {HRG #R004807.0450}
 - Concept Area A (Oak Park Circle) survey and basemapping are completed. Preliminary design has been completed and reviewed with LPTA staff. HRG is coordinating with a SUE subconsultant to receive SUE Level B services.
 - Concept Areas B (Berryhill Rd/North Rd/South Rd) and Area C (Edwin Ave/Ricker Ave) survey and basemapping have been completed. HRG is finalizing preliminary design. HRG is in the process of coordinating a meeting with LPTA staff to review preliminary designs for the week of 2/24.
- Conway Road Park Conceptual Stormwater Management Feature Layout {HRG #R004807.0454}
 - HRG and LPTA staff met on 10/15 to review the Conceptual Stormwater Management layout.
 - HRG revised erosion control to include J-Hooks and has received approval from DCCD. HRG has coordinated with DOLI and is in the process of confirming installation requirements with DCCD.
- Public Works Basin Water Quality Retrofit Project {HRG #R004807.0456}
 - HRG provided the final design and quantities to LPTA staff on 12/12/2024. HRG provided control points for LPTA staff week of 2/3.
- Utah Avenue Drainage Improvements {HRG #R004807.0456}
 - HRG has completed the Survey and Basemapping for the project area. HRG is in the process of preliminary design.

CONSTRUCTION PROJECT STATUS:

- Stonebridge Apartments Stream Restoration – {HRG #R000184.0533}
 - As a condition of the permitting received from PADEP/USACE authorizing construction of the project, annual monitoring of the stream is required for a period of three years following completion. LPT/A has authorized HRG to perform the monitoring and submit the required reports to PADEP/USACE on their behalf. Monitoring for 2024 (Year 2) has occurred and the findings were submitted in a report to PADEP in December 2024.

- To document the project in a fashion that can be used to showcase the results to Township residents and stormwater fee rate payers, HRG has captured periodic photos and videos of the project by use of aerial drone technology. Upon completion of the drone flights, this data will be used to develop a presentation that can be placed on the Lower Paxton Township website. One additional flight is yet to be performed once the vegetation across the site matures.
- BC 7-8 Drainage Improvements – Design; {HRG #R000184.0539}
 - The contract completion dates were extended to October 1, 2024 (substantial completion) and through winter for final completion upon coordination amongst LPTA and Doli. Doli's subcontractor (Lezon) has been on site performing concrete restoration. Doli is expected to return in the Spring 2025 to complete any unfinished storm sewer, punchlist items, and wearing course paving. Note that the schedule is dependent upon PPL completing relocation work that Doli is to be coordinating for remaining storm sewer installation on Cloverdale Rd./Kenwood Ave. Doli, LPTA, GHD, and HRG continue to coordinate on schedule and remaining work to bring the project to a conclusion.
- PC-3E and PC-1F Sanitary and Storm Sewer System Replacement and Rehabilitation Projects: HRG #R004807.0444}
 - Doli mobilized to the project site and began working in October 2024. Through mid-February 2025, DOLI has installed approximately 6,700 LF of new sanitary sewer mainline, 32 LF of new storm sewer, and 74 sanitary sewer laterals were replaced. LPT/A staff are periodically updating the Lower Paxton at Work website with completion status. Work areas thus far have included right of way between Goose Valley Rd. and Colonial Club Dr., Santo Cir., Lemar Ave., Banbridge Dr., Clermont Dr., Blanchester Rd., and Kingston Rd.
 - The first job conference was held on January 28, 2025, and the second is scheduled for February 25, 2025.
 - The progress made to date has resulted in DOLI reaching the limits of the "Actively Disturbed Area" policy in the contract documents, and a letter informing them of such was supplied by HRG on February 18, 2025. To comply with the policy, DOLI will need to cease mainline work and focus on restoration efforts in disturbed areas.
 - With Application for Payment #2 processed in January 2025, construction costs have exceeded \$1M, and accordingly, HRG and LPT/A staff developed the reimbursement documents to submit to access the full grant amount awarded to the project through the CFA Local Share Account program.
 - Substantial and final completion dates set as September 27, 2025, and November 26, 2025, respectively.
 - HRG and LPTA are in the process of negotiating a change order with DOLI to formally incorporate contractor-initiated scope changes for replacement of the Kingston Ave. culvert, 10" ACP sewer lining near Goose Valley Rd., addressing discrepancies related to sewer depth pay items, and incorporating pay items for other work included in the project documents.
 - Coordination with utility contacts on necessary relocations is on-going.

- 2023-25 Non-Consent Decree Area Stormwater Improvements {HRG #R004807.0448}
 - Final Plans (with exception of Prince Street which is on hold pending completion of PennDOT project) were sent to LPTA on 6/18/2024. Construction is anticipated to be handled with in-house LPT/A labor and equipment.
- Old Locust Lane Culvert Replacement {HRG #R000184.0582}
 - It is our understanding that in-house crews have substantially completed construction activities as of late 2024/early 2025.

MISCELLANEOUS ITEMS:

- Stormwater Fee Credit Application Reviews {HRG #R004807.0441}
 - There are no active credit applications under review.
- Emergency Contract Support {HRG #R004807.0440}
 - No work orders that necessitated HRG's involvement were developed in the last reporting cycle.
- Dauphin County Water Resource Enhancement Program (WREP) [HRG #R006524.0433]
 - Tri-County Regional Planning Commission is leading the planning objectives and activities for 2025. HRG's support is focused on project management for CAP Block Grant-funded projects.
- Storm Sewer System Inventorying and Condition Assessment partnership with the U.S. Army Corps of Engineers (USACE) [HRG #R004807.0436]
 - LPTA presented a scope of work and agreement for storm sewer condition assessments through the USACE to the LPTA Board during their meeting in November 2023. The total estimated costs for the technical assistance project were \$224,000 with LPTA and USACE splitting the cost on 50-50 arrangement. LPTA staff have been working directly with USACE on the project.
- Draft DEP MS4 Documents Review [HRG #R000184.0521]
 - In January 2025, DEP made available to the public, draft documents related to the next MS4 reporting cycle. While the documents are related to the "General" permit type, and the Township has historically been issued and is anticipated to still be issued an "Individual" permit, HRG and LPT/A staff are evaluating the documents and generating comments for submission to DEP that may relate to requirements that could carry over to the Individual permit requirements, particularly focused on Total Maximum Daily Loads (TMDLs). HRG and LPT/A are scheduled to meet to discuss on February 26, 2025.
 - Major changes noted in our review thus far include a shift from requiring "pollution reduction plans" to "volume management plans" and more emphasis/reward on regional/intermunicipal collaboration.

Herbert, Rowland & Grubic, Inc.



Jason R. Hinz, P.E.

JRH/LB

R004807.0435

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c: Bill Weaver, LPTA
 Randy Allen, LPT
 Jason Hinz, HRG
 Ryan Cummings, HRG
 Tim Nolt, LPT
 Larry Stepansky, LPTA