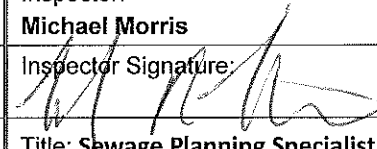


COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT
MS4 COMPLIANCE INSPECTION REPORT

NPDES Permit No. PA1133501	Mo/Day/Yr 01/11/2018	Entry Time 9:30 AM	Exit Time	Inspection Type CEI	eFACTS Inspection ID 2683872
MS4 Permittee Name: Reading City Berks County			<input type="checkbox"/> PAG-13 Coverage <input checked="" type="checkbox"/> Individual Permit <input type="checkbox"/> Check here if a "joint permit" with co-permittees		
Mailing Address: 815 Washigton St , Reading, PA 19601			Municipality: Reading City		
Responsible Official: Ralph Johnson	Title: Pub Wrks Dir		County: Berks		
Business Phone: (610) 655-6236	Email: ralph.johnson@readingpa.org		Permit Expiration Date:		
Co-Permittees (if applicable):			Permit Renewal Application/NOI Due:		
			Chesapeake Bay Watershed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
X Office Visit X Field Visit			Discharge(s) to TMDL Waters? X Yes <input type="checkbox"/> No		
VIOLATIONS: (list below)	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Person Interviewed:	Date:	Inspector: Michael Morris		Date: January 22, 2018	
Signature:	Phone No.:	Inspector Signature: 		Phone No.: 717.705.4793	
Title:	Title: Sewage Planning Specialist				
Email:	Email: michamorri@pa.gov				
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. Violations may also be discovered upon review of Department records.					

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Comments

On January 11, 2018, I (Mike Morris) conducted an MS4 inspection for the City of Reading, Berks County. Ted Arentz (storm sewers supervisor), Frederick Eddinger, Robert Gensemer (sewers superintendent), Tim Krall (utilities engineer) and Ralph Johnson (Director of Public Works) represented the city. Kent Morey, senior engineer with SSM group, was also in attendance as municipal consultant. I explained that we were not planning on issuing violations for this first MS4 inspection. Rather, our intention was to help ensure that the program is being administered properly.

The City of Reading's MS4 status is atypical in that they are still covered under an older version of an individual permit because of a legal challenge to a TMDL. I have attempted to write this inspection report in consideration of both compliance with the older permit requirements that they are still covered under (*in italics*), as well as how well they would have complied with the more recent permit requirements (in plain text). Input on the latter will help them prepare for coverage under the forthcoming permit.

In the following, the "yes" and "no" statements indicate whether the requirements are met for each MCM and BMP, based primarily on the meeting and a review of the progress report submitted in 2017. *Please note that the "MS4 Compliance Inspection Report" checklist letter loosely follows this summary, though it is not in the exact same order as the BMPs in the appendix.*

MCM 1: Public Education and Outreach Program

Relative to the newer permit requirements:

BMP 1: Yes and No. I was shown a newly drafted (late November 2017) public education and outreach program at the inspection and it was later emailed for my review. I don't believe that they had been following a written plan prior to this one. The plan could be improved by making it more specific. For instance, it says that they will "create an educational piece to be distributed throughout the city". What key content should be covered, and how will it be distributed? The plan also says that "material will be placed on the City of Reading website." Again, what is the key content? Also, links to the DEP and EPA stormwater pages should be included if the website is to be used to satisfy BMP3. Is the city of Reading going to rely on activities done by the county? If so, the plan could explain what types of county activities are expected to reach the City of Reading's target audiences, and how the content will be documented. The plan could also be improved by stating who is responsible for making sure the city meets the MCM1 goals each year.

BMP 2: Yes and No. While categories of target audiences were generally defined, this could be improved by stating how they can access contact information or otherwise reach individuals within the groups. From our discussions, it sounds like this information can typically be found in existing databases or files. If so, I don't think that actual printed lists need to be kept with their MS4 files.

BMP 3: Yes and No. I saw that they had some MS4 content on their webpage, including a pamphlet from EPA entitled "Protecting Water Quality from Urban Runoff." This pamphlet had good educational information and a link to the EPA stormwater webpage. The website could be improved by adding the link to the DEP stormwater webpage as well. I also suggest that they use their website to define illicit discharges and explain how they may be reported. I was also shown a door hanger that was distributed, but it wasn't really comparable to a newsletter, so I will talk about this under the next BMP.

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BMP 4: Yes and no. In addition to the newsletter or website, MS4 materials must be distributed by at least two other methods. I was shown a door hanger that explained in both English and Spanish why trash should not be swept into stormdrains. I was told was distributed throughout the city. I was also told that some of their inlets were marked with no dumping stencils or badges. This would count as well if documented, perhaps by including a picture of one of the marked inlets and a list of areas that have been marked. I also saw a list of activities done by the county, but documentation should be provided to more specifically indicate the MS4 content.

MCM 1 Relative to the older permit requirements that they are still under

Yes: According to the older requirements, they need to have a community education program to distribute materials/conduct outreach about the effects of stormwater discharges and how the public can reduce pollution. They had good information on the website and I was shown a door hanger that explains why trash should not be swept into inlets. I was also told that some of their inlets were marked to warn against dumping, and I also saw a list of educational activities done by the county. Better documentation should be included in progress reports.

MCM 2: Public Involvement and Participation Program

Relative to the newer permit requirements:

BMP 1: Yes and No. I was shown a newly drafted (late November 2017) public involvement and participation program at the inspection and it was later emailed to me for my review. Prior to this, I don't believe that they had a written plan that they were following. Improvements could be made to their plan. For the annual public meetings, the plan should specify that an overview of their MS4 program will be given, that there will be an explanation of illicit discharges and how they may be reported, and that there will be an opportunity for questions/feedback. The plan should also state how the public will be notified ahead of time as to which meeting(s) will include MS4 content. The plan talks about making a spreadsheet of community groups. Has this been made? If so, they should include the list of groups and their contact information in the plan. The plan should also explain how they will reach out to these groups when there are involvement opportunities.

BMP 2: Yes? No? It is my understanding that PA law requires advertising and public comment periods for municipal ordinances. I asked to see documentation of this at the meeting, but they didn't have the advertisements for their MS4 ordinances on hand with their MS4 files. They were confident they could find the advertisement for their recent ordinance that authorized the MOU with the county conservation district. However, they were not sure if they could find the advertisement for their 2008 stormwater ordinance in their files. I suggest that they keep copies of these advertisements with their MS4 files.

BMP 3. No. They didn't have any documentation on hand at the inspection or in their progress report to demonstrate that they have been covering the required MS4 content at the annual public meetings. I was told that a former employee had been working on their MS4 program, and they were unsure if she was making sure that this got done.

MCM 2 Relative to the older permit requirements that they are still under:

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No. It appears that the old requirements were pretty general: implement procedures for the receipt and consideration of information submitted by the public and comply with state and local public notification requirements. They propose to rely on meetings to allow for public input, but I didn't see documentation of these meetings. Furthermore, I did not see documentation indicating that public has been educated about how to submit MS4 complaints. They believed they could find documentation of the advertisement of their MS4 ordinance that authorized the MOU with the county, but they didn't have it on hand at the inspection. And, they were unsure if they could even find the advertisement for their overall stormwater ordinance from 2008 in their files.

MCM 3: Illicit Discharge Detection and Elimination Program

Relative to the newer permit requirements:

BMP 1: No. At the meeting, I was shown a newly drafted (late November 2017) plan, and it was later emailed for my review. Their new plan was very brief and missing a lot of information. The PAG13 appendix should be carefully read to ensure that all the required information is covered. The following are examples of information to include. The plan should state who is responsible for the various MCM3 tasks. The plan should state what constitutes "dry weather" and how many outfalls will be screened each year. The plan should state which, if any, outfalls have been determined to have continuous dry weather flow and/or past problems, and thus need to be screened annually. The plan needs to explain the selection of priority areas and how they will be screened in different seasons and meteorological conditions. The plan should state how the public is to be notified about what illicit discharges are and how to submit complaints. The plan should state who follows up on complaints and over what timeframe. The plan needs to have procedures for finding the source of pollution when contamination is detected. For instance, it should state that MS4 system maps will be given to public works personnel and emergency responders. The plan should explain how dye testing, smoke testing and televising of sewer lines may be used and who could provide these services. The plan should state that sampling is required when odor or appearance indicates a discharge is polluted. The plan should also explain who would be qualified to collect water samples, who would determine what to test for, and who could do the analysis. The plan should also state that residents may be interviewed in cases where there is an isolated dumping incident or when the cause of a problem is unknown. The plan should explain when contacting Hazmat and/or DEP is necessary and how they may be contacted. The plan should explain how the ordinance allows for penalties. Also, what steps may be taken to enforce/resolve relatively minor issues that may not need to involve DEP, the solicitor or penalties per the ordinance? For instance, what is to be done when grass clippings are being shot out into the street? Are there any onlot septic systems in the urbanized? If so, the plan needs to explain how their effects on storm drains will be assessed, and the sewage enforcement officer's contact information should be included. The plan should state what to do if access to a private property is denied for an MS4 investigation. Would language in their existing ordinance be applicable? If the solicitor were not available, say in the middle of the night, when would a search warrant be necessary and how could it be obtained? Also, where are records kept and for how long are they retained?

BMP 2 and 3: Yes and No. At the inspection, I saw that they had the maps with municipal boundaries, roads, outfalls and surface waters, though I was told that some unnamed tributaries needed to be added. I believe they were working on adding basins. The maps that I saw at the inspection lacked the inlets, pipes and

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watershed boundaries, but I was told that their new GIS maps had them. Readable maps should be provided to public works and emergency responders.

BMP 4: Yes and No. They indicated that all, or rather, nearly all, of their outfalls were screened recently. I asked about a screening sheet that was incomplete and it was explained that there was at an outfall that couldn't be accessed due to private property. I was also told of other outfalls that couldn't be accessed because a section of stream was piped underground. In these cases, observation points outside of the inaccessible areas may be used rather than the actual outfalls themselves. The selection of particular observation points should be justified in their plan.

Be aware that outfalls with a history of past problems or continuous dry weather flow must be screened annually. I believe that they at least have some with continuous dry weather flow, but they haven't been doing this. I also saw that they didn't use a more recent version of the DEP provided screening sheet. They should switch to the newer form available at: <http://www.elibrary.dep.state.pa.us/dsweb/View/Collection-12798>. Also, be aware that it is required to sample if odor or appearance indicates the discharge is polluted. This was determined to be unnecessary during their last round of screenings

BMP 5: Yes and No? I saw that they had the required ordinance but I didn't see the letter from the municipal official.

BMP 6: No. I did not see documentation demonstrating that target audiences have received information about their illicit discharge program annually. While they did have some general educational information under MCM1, the City of Reading should specifically define what constitutes an illicit discharge per their ordinance and explain how they may be reported. I was told that they already have complaint submission systems in place. They can use these for MS4 as well, so long as they explain what illicit discharges are and direct their target audiences to submit MS4 complaints using these systems. When complaints or other problems are discovered, the municipality should be sure to keep files with complete records of these issues, from the initial complaint to the final resolution. Such documentation should give evidence of prompt and appropriate responses. The person who I was interviewing during this part of the inspection, Ted Arentz, was unaware of the history of complaints or the existence of such files, as he recently started in this position. And, the former employee who worked in this program was no longer with the city. He did say that they had recent incidents involving sewage backups, but he didn't have documentation of these issues with their MS4 files. I also noticed that a prior annual report had a newspaper article about someone changing vehicle fluids in the street.

We also discussed cleanup after traffic accidents. I explained that if absorbent is placed on spills but not swept up, an illicit discharge could result. The municipality would be responsible since it is their permit and outfalls. If municipal employees become involved with the accident response they should keep brief records of proper cleanups occurring when it is reasonable and safe to do so. Otherwise, they should be able to document that they have educated the responsible parties on the need for proper cleanup when it is reasonable and safe to do so.

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MCM 3 Relative to the older permit requirements that they are still under:

Yes and No. I saw that they had a map with the locations of all outfalls and the names of some of the surface waters that receive them. I was told that some unnamed tributaries were missing though. I also saw they had the stormwater ordinance prohibiting illicit discharges. They are to implement appropriate enforcement procedures and actions per the ordinance. When incidents occur, the municipality should maintain the appropriate records of the various incidents, from the initial finding to ultimate resolution. They didn't have such documentation on hand, though I saw that a prior annual report had a newspaper article about someone changing vehicle fluids in the street, and I was told that there have been responses to sewage backups. They should also document cleanup after vehicle accidents, or at least document that they educated the responsible parties on the need for cleanups when it is reasonable and safe to do so. They are also to develop a plan to detect and address non-stormwater discharges, including illegal dumping to the MS4. They had a very brief plan, but see my comments above under MCM3 BMP1 on how it can be improved. I saw that they have screened their outfalls. They are also to inform public employees, businesses, and the public of the hazards associated with illegal discharges and improper disposal of wastes. They had some content about this under MCM 1, but I thought their website/other educational materials could do a better job of explaining what constitutes an illicit discharge and how they may be reported. Furthermore, their employee training plan (MCM6) doesn't explain how all employees will be trained about this, and I didn't see such training records.

MCM 4 and MCM 5 BMPs 1-3:

Relative to the newer permit requirements:

For MCM 4, and MCM 5 BMPs 1-3 I believe they are relying on the Pennsylvania Department of Environmental Protection's Qualifying Local Program (QLP) which is the County Conservation District. The municipality is reminded that documentation of permitting and inspection for both construction and post construction activities provided by County Conservation District must be available for inspection by either the PA DEP or the US EPA, in accordance with the records retention schedule. The municipality is also reminded that if a construction activity occurs requiring stormwater facilities, but sized below the cutoff for conservation district involvement, the municipality is still required to retain local design review, construction, and inspection documentation in accordance with the records retention schedule. I saw an executed MOU with the county conservation district at the inspection.

MCM 4 Relative to the older permit requirements that they are still under:

They rely on the county conservation district for this. I saw the executed MOU at the inspection.

MCM 5: Post Construction Stormwater Management

Relative to the newer permit requirements:

BMP 4: Yes and No. I saw that they had the required ordinance. I didn't see the letter from the municipal official though.

BMP 5: Yes and No; Their existing ordinance had the LID appendix, but I don't believe they had documented a formal review of their SALDO and zoning ordinances for consistency with LID. My guides were not aware of any LID projects in the municipality.

BMP 6: No. It is my understanding that they: do not have a plan for this BMP, haven't listed the information for the qualifying BMPs, and haven't been doing the inspections. Once they are subject to these

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requirements, which I believe will be the next permit cycle, the municipality should be sure to review the requirements stated in the PAG13 permit appendix.

MCM 5 Relative to the older permit requirements that they are still under:

Yes and no. They have an ordinance that addresses post construction stormwater runoff. They are to ensure the adequate long-term operation and maintenance of BMPs. I didn't see records of BMP inspections. According to the older permit requirements, they are to require infiltration BMPs where practicable. Make sure this is followed if any qualifying projects are proposed while covered under this permit. Finally, be aware that the municipality is to "implement strategies, which include a combination of structural and/or nonstructural BMPs, appropriate to the local community". Be sure that this is followed if significant new development/redevelopment is proposed. I think this would be considered during the concurrent review with the county conservation district per the state's procedure.

MCM 6: good housekeeping for municipal operations

Relative to the newer permit requirements:

BMP 1-Yes and No. They had a good list of municipal facilities with their locations. They did not have a good list of operations though. The municipality should be sure to continuously update these lists as needed.

BMP 2- Yes and No. They had just a few, brief procedures relating to street sweeping, cleaning catch basins and inlet grates, checking flooding hot spots, outfall inspections, storm line inspections, spill response, and residential education about dumping. Much needs to be added. How are street sweepings and inlet debris properly disposed of? Where and how are they stored prior to disposal? The plans should state that dumpster lids should be kept closed when not in use. How is yard waste collected, stored and disposed of? What about waste oil and antifreeze? The plans should specify paint and pesticide storage, use, and disposal procedures. The plans should state that all containers of potentially hazardous substances are to be labelled. The plans should specify where the floor drains go in their various buildings. The plan should state how to properly clean up and dispose of gasoline and diesel spills. The plans should cover storage, use and disposal of chemicals and pool water at the public pool. The plans should include procedures for the firefighters, including washing of firetrucks. Where and how are other municipal vehicles to be washed? The plan should cover cleanup after traffic accidents. What are the proper storage procedures for piles of salt and topsoil? What are the graffiti removal procedures? What procedures are to be used to prevent sediment runoff during and after excavation? These are only some of the things that must be taken into consideration. The municipality should think of any ways in which their properties, equipment and operations may present a threat of stormwater pollution and continue to update and improve their procedures as necessary.

BMP 3-No. Essentially, their newer plan, which was put together last November, just says that that the storm sewer supervisor will present materials to municipal employees and the materials will come from federal, state and local agencies. The plan needs to make it clear that training is required for all employees. The plan should state the key information that all employees need to know, such as what the program is about, what an illicit discharge is, how they may be reported, and who to pass any complaints or inquiries along to. How will they make sure that all employees are trained on this? Furthermore, I suggest they categorize their employees and explain how each group will get what they need. For instance, their plan could detail how public works staff, police, firefighters etc. will get the trained on the specific MCM6 BMP2 procedures that they are expected to follow. In addition to the operation and maintenance manual, training may also need to be done on illicit discharge inspections and investigations, records retention, BMP inspections, cleanup after

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traffic accidents etc. for certain groups of employees. Be sure to keep good records of trainings as they occur. In the future, the municipality should be able to provide records demonstrating that all their other employees have been trained as necessary. The only training record that I saw was that one employee attended an MS4 Responsibilities Presentation” hosted by the “Municipal Secretaries Association”

MCM 6 Relative to the older permit requirements that they are still under:

Yes and No. Per the older requirements they were to have an operation and maintenance program that includes training. Therefore, I think my above comments under MCM 6 are mostly relevant. However, these older requirements didn't seem to explicitly require a written training plan. One concern is that I didn't see documentation indicating that all the various types of municipal employees are being educated as needed. The only training record that I saw was that one employee attended an MS4 Responsibilities Presentation” hosted by the “Municipal Secretaries Association.”

Good Housekeeping and BMPs

The first municipal property that we toured was the public works area around the public works office building located at 503 North Sixth Street. Their salt storage shed lacked doors and was completely open in the front. Salt was tracked beyond the entrance, presumably due to recent use. The salt shed should either be fitted with doors, or alternatively, the front of the salt pile could be covered with large tarps when it is not in use to prevent precipitation from contacting the salt pile. Also, the workers should be sure to sweep up salt that has been tracked in front of the shed and return it to the pile. I also noticed that some dumpster lids were left open. They should be kept closed when not in use.

We then went into their public works sheds, which were composed of numerous rooms used by different programs. I was told that the floor drains in these rooms went to the sanitary sewerage system, which is appropriate. I was told that some trucks are washed in these bays and thus the washwater goes to the sanitary sewer. However, most of their vehicles are washed at a private car wash that they have a contract with.

The first room that we looked at was used by workers who painted and removed graffiti. The paint was kept in relatively small containers, 5 gallon buckets, that appeared to be in good shape. Therefore, catastrophic spillage was of little concern. One area of this room was used for storage of solutions and equipment used in graffiti removal. There was what appeared to be a large pressure washer and some small carboys of a fluid labelled “Taginator.” Some of the containers sat atop a secondary containment pallet, which we typically recommend. Other containers and the sprayer sat on the floor, but they were close to a trenched floor drain, so if there were any spills they would probably go to the sanitary sewer system rather than outside. Therefore, no problems were apparent with storage. I did wonder about the potential for stormwater contamination during use of the graffiti removal solution, as it is apparently sprayed out of a pressure washer. I looked up the safety data sheet, and it seems that while the solution is neither highly toxic or highly hazardous, it isn't completely innocuous either. My guides were uncertain of the procedures followed by these workers. The MCM6 BMP2 plan should specify the appropriate procedures for graffiti removal as well as the various other things done by these workers such as waste paint disposal, cleaning of brushes and equipment etc.

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There were also some drums of DEF diesel engine additive stored over secondary containment. It is my understanding that DEF is relatively innocuous, and even if it did spill it appeared that it would go to the floor drain leading to the sanitary sewer. I saw that flammables cabinets were in use. I also saw a parts washer. Normally I would suggest that the workers make sure that it is secured so that it can't tip over, that it is inspected to make sure that it doesn't leak, and that they have plan for disposing of used solvent if necessary, but it appeared that it wasn't in use. If it isn't used, the workers should make sure that it is empty.

As we walked through the various bays of the municipal sheds I kept an eye out for large vehicles with substantial leaks. Overall, the floors appeared to be pretty clean and no major leaks were observed. With that said, I suggest that spill cleanup kits (such as absorbent, broom and dust pan) be kept wherever large quantities of potentially harmful fluids are stored and used. Be sure to promptly clean up any spills as necessary. If necessary, the workers should consider using drip pans and/or fixing any persistent leakers.

In the Streets Department bay, I noticed some drums of various fluids such as kerosene, diesel and hydraulic oil stored along the wall. Two of the barrels sat atop a secondary containment pallet. Secondary containment is generally recommended, though not necessarily required. I saw that absorbent was kept at this location. I recommend that they keep a broom and dustpan onsite as well. I saw another barrel with a dispensing valve that was stored on its side. A small container was kept under the valve to capture drips. Due to the possibility of valve failure or leakage, secondary containment is particularly recommended for this one. They may also consider adding a secondary valve or plug in case of valve failure.

Workers should be sure to keep barrels and other fluid containers properly labelled. If there are any containers with unknown substances, they may need to contract with a chemical disposal company to determine what it is and proper disposal. Also, it is generally recommended to keep drums away from entrances, where spillage may make it outside, and in low traffic areas. It is also recommended to check containers regularly for signs of structural damage and leakage. Trenched floor drains typically ran in front of entrances to these sheds, making it likely they would intercept most spills before anything would make it outside. It also appeared that most containers were labelled, though I believe that there was at least one unlabeled drum.

We then looked in the area where the mechanics worked. I saw that they had hoses hanging from the ceiling for the dispensing of vehicle fluids. These fluids were stored in very large cylinders that appeared to be in good shape and had secondary containment walls of cement built around them. This dispensing system should be looked at regularly to make sure there are no leaks. I also saw a barrel of hydraulic oil in this area sitting atop a secondary containment pallet.

I asked about the future use of some of the empty barrels that they had accumulated, and I was told that they were to be reused or repurposed. I explained the importance of considering their original contents and making sure that they are properly cleaned of any hazardous residue if they are to be repurposed for things like trash cans.

We looked in a bay where waste oil and antifreeze was stored. I saw some of open pans with fluid in them left sitting out. I was told that vehicle fluids were drained into these pans, which are then taken to this room where they are to be sucked up into large cylinders. I was told that the large cylinders have alarms to indicate when they are full, and

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that Safety Clean periodically comes to empty them. Receipts should be kept as evidence of this. There were also various other barrels and a metal tank stored in this room. One drum laid on its side, though atop a secondary containment pallet. I expressed concern that if a container failed, leaked or spilled in this room, the contents may make it outside, especially since there was no floor drain along the door on one side. Therefore, I suggested that they put some sort of containment barrier in front of the door. As we discussed, there may be some moveable options so that they can still accept deliveries.

We then went outside and looked at their diesel and gasoline fueling station. I was told that the tanks were double walled, and I saw that they sat atop concrete pads. They should keep a spill cleanup kit at this location and use it as necessary. I also suggested that they post a sign stating that spills need to be cleaned up and explaining what to do in case of an emergency. They should also regularly inspect this area for problems, especially since I noticed a stormwater inlet downhill from the tanks.

Another area of their workyard had a paved pad that was enclosed on three sides by cement barriers. There was a small pile of street sweepings containing trash on the pad. I was told that the sweepings are stored here until they can be taken to the land fill, which happens away several times a week. I suggested that they keep a tarp over the piles to prevent runoff contamination and dust generation.

I noticed a few plastic containers on trailers that were left outside, and I asked what they were used for. My guides were uncertain, but they speculated that they were not being used and that they might have been left by the graffiti removal people. We also walked by a large open bag of what appeared to be wet sand. I also noticed some plastic barrels stored outside. They appeared to be empty and at least some were labeled DEF. My guides were unsure of the history of these items. The workers should confirm the prior use of these various containers, and make sure that they are free of problematic contents or residue.

We then drove to the swimming pool by Schlegel Park. I noticed that there was a dumpster with an open lid. Dumpster lids should be kept closed when not in use. I asked where the pool was drained to. My guides did not know, but they speculated it was the sanitary sewer. This should be confirmed. Please see the following quoted from the new PAG 13 Fact Sheet available at: [http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-112615/3800-PM-BCW0100i%20Fact%20Sheet%20\(Final\).pdf](http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-112615/3800-PM-BCW0100i%20Fact%20Sheet%20(Final).pdf).

“The 2018 General Permit removes dechlorinated swimming pool discharges from the list of authorized non-stormwater discharges. DEP’s policy as presented in its fact sheet, “Swimming Pool Water Discharge Guidelines” (3800-FS-DEP4251), calls for disposal of dechlorinated swimming pool water to sanitary sewers or otherwise infiltration to the subsurface, but not discharge to streams or storm sewers.” The Swimming Pool Water Discharge Guidelines fact sheet can be found at: <http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-117692/3800-FS-DEP4251.pdf>.

We looked at the chemical room. Large bins labelled hypochlorite were stored outside and near a floor drain, but I am not sure if they still contained the chemical solution. Inside the chemical room there were 5 gallon carboys labelled to contain hydrochloric acid. There were also filter tanks and a pipe that was draining pool water to a floor drain. I asked where the floor drains went and my guides indicated that it was probably the sanitary sewer, but they were uncertain. They need to figure this out, as floor drains going outside, to the storm sewer system, or to a waterway would be

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inappropriate for such locations where large quantities of chemicals are stored. I did notice that the manhole lids outside the chemical storage room said storm sewer.

I was told that there were 6 fire stations in the City of Reading. We briefly looked at one located at the corner of Brookline and East Wyomissing Boulevard. I noticed a trash can outside with no lid. Trash cans and dumpsters should be kept covered when not in use, unless nothing is put in it that could significantly contaminate storm water. I was told that the floor drains in the fire station go to the sanitary sewer and that all washing takes place indoors. They indicated that they did not keep large quantities of chemical on hand.

We then travelled to the Family Dollar store at the corner of South 6th Street and Bingaman Street to look at a stormwater BMP located along their parking lot. I believe they said that this one was built for an NPDES permit, and that it was about 2 years old. The basin appeared to be a rock lined trench with a pipe feeding into it, and a slightly raised outlet drain. No major erosion or sedimentation problems were apparent, but there was a substantial accumulation of trash in it, including some items that might be pollutant sources, such as a couple of plastic motor oil quart containers and a handful of empty windshield washer fluid containers. Furthermore, the outlet drain was almost completely covered by a sheet of cardboard, and the pipe leading into the basin had trash in it. Such clogging with trash may create drainage problems. However, before I said anything to Mr. Arentz about the issue, he was already calling their enforcement people to report the problem. I was told that they would let the property owner know that it must be cleaned out. If this is a reoccurring problem area periodic site checks may be necessary.

We then travelled to the leaf and yard waste drop off site off Hill Road. Various substances were stored here, including road millings, yard waste, leaves, topsoil, broken concrete, etc. I am not fully aware of the regulations about this, but the site might require a permit from our waste management program. My guides were unsure if the site was permitted or not. I suggest that the municipality reach out to DEP's Division of Municipal and Residual Waste, at 717-787-7381 to make sure that this site is being used properly and permitted if necessary. I will try to address the MS4 concerns. One issue is that the site is situated up a steep hill from a stream. However, a couple foot high berm, that was at least partially vegetated, had been constructed along the downslope edge of the property. There was also a length of forest (>100 ft) between the site and the stream. And, I didn't see any evidence of substantial erosion from the site to the stream. However, the berm itself appeared to have been constructed of what might be considered waste materials, such as road millings, broken concrete, asphalt etc. I also noticed that a portable toilet was lying on its side near the edge of the berm. The municipality should make sure that it was empty, and clean up after it if necessary. There were also some large dumpsters at the site, and one appeared to be full. It was explained that these originated from a city litter and trash cleanup event. I suggested that they keep it covered until the trash can be hauled away.

I noticed that one area of the waste site had some empty barrels stored outside. Some were labelled to contain Dowfrost and antifreeze. I looked up the SDS sheets from Dowfrost and it appears to be relatively innocuous. As a general consideration though, the municipality should consider prior use when repurposing barrels and make sure that barrels stored outside are free of hazardous contents or residue if there is a significant risk of leakage.

MS4 COMPLIANCE INSPECTION REPORT

OFFICE INSPECTION

Most Recent Annual/Progress Report Due Date: **June 30, 2017**

Date Most Recent Annual/Progress Report Submitted: **July 3, 2017**

List all deficiencies identified in the most recent Annual/Progress Report Review: Quoted from a review done by Scott Arwood on 7/20/16:

General Comments: Due to your pending individual permit status you have used the pre-2013 reporting form. This checklist has been designed to align with the current (post-2013) reporting form, and therefore the usefulness of the feedback provided herein may be somewhat limited and/or not applicable for some items.

MCM #1, BMP #1 & BMP#2: Since the Berks County MS4 Steering Committee (BCMS4SC) updates the PEOP and Target List yearly, the 2016 plan should be included with the annual report.

MCM #1, BMP #3: Educational materials not provided, but not required due to current permit status. While the Planning Commission does maintain a MS4 information website, suggest adding MS4/stormwater information (or at least links to BCPC, DEP, EPA, etc.) to the city website.

MCM #2, BMP #1: The BCMS4SC PIPP should be included with report.

MCM #2, BMP #3: Documentation provided for a public meeting on 5/26/2015, but no information on content provided.

MCM #3, BMP #1: You are not required to have written IDD&E program due to your current permit status, however be advised it will be required in the 2018-2023 permit term.

MCM #3, BMP #3: Unclear if entire known system has been mapped, or if mapping of known system is still in progress.

MCM #3, BMP #5: Unclear if ordinance was submitted, or if the 2008 ordinance addresses illicit discharges.

MCM #4: MOU with BCCD.

MCM #5, BMP #1-3: MOU with BCCD.

MCM #5, BMP #4: Unclear if ordinance was submitted, or if the 2008 ordinance addresses PCSM.

MCM #5, BMP #6: No written plan required by current permit status, but will be required in next permit term.

MCM #6, BMP #1: Unsure if previously submitted O&M plan includes inventory.

MCM #6, BMP #3: No written plan required by current permit status, but plan required in next permit term."

Describe the permittee's progress with addressing deficiencies, if applicable:

Be aware that they are still covered under that individual permit and thus the older requirements.

MCM1 BMP1 and 2. A newly written plan and list were provided following the recent inspection. See my aforementioned comments about how they may be improved though.

MCM1 BMP3. I saw that they had an EPA provided MS4 pamphlet on their webpage. A link to the DEP stormwater webpage should be added. I also suggest adding a specific definition of illicit discharges and instructions for reporting them.

MCM2 BMP1. A newly written plan was provided following the recent inspection. See my aforementioned comments about how it may be improved though.

MCM2 BMP3. I didn't see documentation of public meetings.

MCM3 BMP1. A newly written plan was provided following the recent inspection. See my aforementioned comments about how it may be improved though.

MCM3 BMP3. They are still in the process of completing their mapping.

MCM3 BMP5. I saw that their 2008 ordinance addresses illicit discharges. I didn't see a record of it being submitted to DEP with a letter though.

MCM4. MOU with BCCD

MCM5 BMP 1-3. MOU with BCCD

MCM5 BMP4. I saw that their 2008 ordinance addresses PCSM. I didn't see a record of it being submitted to DEP with a letter though.

MCM5 BMP6. I didn't see a record of them doing this.

MCM6 BMP1. I saw that they had an inventory of properties, but not of operations.

MCM6 BMP3. A newly written plan was provided following the recent inspection. See my aforementioned comments about how it may be improved though.

MS4 COMPLIANCE INSPECTION REPORT

Verify the presence of the following documentation; check "Yes" if available, "No" if not available, and "NA" if not applicable.				
MCM	Item	Yes	No	NA
1	Public Education and Outreach Program (PEOP) (written plan)	X	X	<input type="checkbox"/>
	Lists of target audience groups	X	X	<input type="checkbox"/>
	Published stormwater educational materials	X	X	<input type="checkbox"/>
	Two methods of distributing educational materials in past year	X	X	<input type="checkbox"/>
2	Public Involvement and Participation Program (PIPP) (written plan)	X	X	<input type="checkbox"/>
	Public notice prior to adoption of any ordinance (municipal) or SOP (non-municipal)	?	?	<input type="checkbox"/>
	At least one public meeting in past year	<input type="checkbox"/>	X	<input type="checkbox"/>
3	Illicit Discharge Detection and Elimination (IDD&E) Program (written plan)	<input type="checkbox"/>	X	<input type="checkbox"/>
	Outfall inspection and illicit discharge tracking system	X	X	<input type="checkbox"/>
	Complaint tracking system for illicit discharges	<input type="checkbox"/>	X	<input type="checkbox"/>
	Map of all outfalls, receiving waters, stormwater collection system, swales, basins, etc.	X	X	<input type="checkbox"/>
	Stormwater sampling and monitoring records	X	X	<input type="checkbox"/>
	Ordinance (municipal) or SOP (non-municipal) prohibiting non-stormwater discharges	X	<input type="checkbox"/>	<input type="checkbox"/>
4	If not relying on PA's program, a written stormwater associated with construction activities program (written plan)	<input type="checkbox"/>	<input type="checkbox"/>	X
	If not relying on PA's program, an ordinance (municipal) or SOP (non-municipal) requiring implementation of erosion and sediment control BMPs	<input type="checkbox"/>	<input type="checkbox"/>	X
	If not relying on PA's program, written procedures for managing public inquiries of local construction activities	<input type="checkbox"/>	<input type="checkbox"/>	X
5	If not relying on PA's program, a written post-construction stormwater management plan	<input type="checkbox"/>	<input type="checkbox"/>	X
	If not relying on PA's program, a tracking system containing post-construction BMPs	<input type="checkbox"/>	<input type="checkbox"/>	X
	If not relying on PA's program, inspection results of post-construction BMPs	<input type="checkbox"/>	<input type="checkbox"/>	X
	An ordinance (municipal) or SOP (non-municipal) to enforce post-construction BMPs	X	<input type="checkbox"/>	<input type="checkbox"/>
	An inspection program ensuring stormwater BMPs are properly operated and maintained	<input type="checkbox"/>	X	<input type="checkbox"/>
6	Inventory of municipal facilities and land uses that contribute to stormwater runoff	X	X	<input type="checkbox"/>
	Written Operation & Maintenance Plan for municipal facilities addressing housekeeping	X	X	<input type="checkbox"/>
	Written employee training program	<input type="checkbox"/>	X	<input type="checkbox"/>

MS4 COMPLIANCE INSPECTION REPORT

FIELD INSPECTION – BMPs

BMP Description: Stormwater basin		<input checked="" type="checkbox"/> Structural BMP <input type="checkbox"/> Non-Structural BMP BMP Reported In: <input type="checkbox"/> Annual/Progress Report <input checked="" type="checkbox"/> Other (<u>viewed during inspection</u>) Property: <input type="checkbox"/> Public <input checked="" type="checkbox"/> Private Is BMP Implemented or Being Implemented? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Who Is Responsible for O&M (Structural BMPs Only)? <input type="checkbox"/> Municipality <input checked="" type="checkbox"/> Other (Name: <u>property owner</u>) Date Installed (Structural BMPs Only): I believe within the past 2 years.
Locational Description: Outside of the Family Dollar at the corner of South 6th Street and Bingamen Street. Note: Lat/Long estimated from eMapPA for the Family Dollar, not the BMP	Structural BMPs Only: Latitude: 40° 19' 44" Longitude: -75° 55' 35"	Is BMP Located in Urbanized Area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments/Deficiencies: I believe they said that this one was built for an NPDES permit, and that it was about 2 years old. The basin appeared to be a rock lined trench with a pipe feeding into it, and a slightly raised outlet to drain water. No major erosion or sedimentation problems were apparent. However, there was a substantial accumulation of trash in it, including some items that might be pollutant sources, such as a couple of plastic motor oil quart containers and a handful of empty windshield washer fluid containers. Furthermore, the outlet drain was almost completely covered by a sheet of carboard, and the pipe leading into the basin had trash in it. Such clogging with trash may also create drainage problems. However, before I said anything to Mr. Arentz about the issue, he was already calling their enforcement people to report the problem. I was told that they would let the property owner know that it must be cleaned out. If this is a reoccurring problem area the municipality may need to do periodic checks of the BMP.		Is BMP Located in Urbanized Area? <input type="checkbox"/> Yes <input type="checkbox"/> No
BMP Description: Locational Description: Comments/Deficiencies:		<input type="checkbox"/> Structural BMP <input type="checkbox"/> Non-Structural BMP BMP Reported In: <input type="checkbox"/> Annual/Progress Report <input type="checkbox"/> Other (_____) Property: <input type="checkbox"/> Public <input type="checkbox"/> Private Is BMP Implemented or Being Implemented? <input type="checkbox"/> Yes <input type="checkbox"/> No Who Is Responsible for O&M (Structural BMPs Only)? <input type="checkbox"/> Municipality <input type="checkbox"/> Other (Name: _____) Date Installed (Structural BMPs Only): Is BMP Located in Urbanized Area? <input type="checkbox"/> Yes <input type="checkbox"/> No
BMP Description: Locational Description: Comments/Deficiencies:		<input type="checkbox"/> Structural BMP <input type="checkbox"/> Non-Structural BMP BMP Reported In: <input type="checkbox"/> Annual/Progress Report <input type="checkbox"/> Other (_____) Property: <input type="checkbox"/> Public <input type="checkbox"/> Private Is BMP Implemented or Being Implemented? <input type="checkbox"/> Yes <input type="checkbox"/> No