



## Information Briefing Summary *Borough Council and Mayor*

### RE: Greencastle MS4 Sediment Reduction Requirements per PAG-13

**Date Presented:** 30 May 2019  
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#### **Action Forcing Event Initiating Borough Council Action/Review**

The Borough Council and staff have been developing the Stormwater Utility Budget and Revenue plan and developing a strategy to execute on the MS4 PAG-13 requirements. Staff review found a pertinent change to the Borough permit impacting the development of the program.

#### **Background Information**

The MS4 permit, formally named the PAG-13, outlines many requirements the Borough must meet as part of the MS4 program.<sup>1</sup> The most expensive part of the program is meeting the sediment reduction requirements of 10% per Appendix D of the PAG-13.<sup>23</sup> Appendix D of the PAG-13 provides assumed values of area coverage and impervious coverage for all municipalities at which point sediment reduction quantities can be calculated. The majority of municipalities, including Greencastle, elected to utilize the DEP provided values which is how Greencastle arrived at a sediment reduction requirement of 142,217lbs as approved by the Department of Environmental Protection (DEP) in the Borough's Pollutant Reduction Plan (PRP).

The remainder of this briefing outlines a change to the values resulting in a reduced burden to the Borough.

#### **Analysis**

Many of our Borough citizens, Borough Council, and Mayor have voiced concern about the development of the Stormwater Utility, MS4, and the financial burden it will place on the community stated at \$780,000.00 per year in needed revenue. The Borough Manager and Assistant Borough Manager (E. Ratliff & L. Hohl) hearing these many concerns and sharing in them engaged in many exercises to ensure the Stormwater Utility and stormwater program were deeply vetted and to make sure nothing was missed. One of the many exercises we went through was a Greenfield exercise. In our Greenfield exercise we conceptually started over and built the MS4 program and Stormwater Utility for our Borough from the very beginning. We poured over all of the letters we have received, reviewed permit

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<sup>1</sup> Borough of Greencastle PAG-13

<sup>2</sup> Ibid

<sup>3</sup> Department of Environmental Protection Effectiveness Values Table (Municipal)

requirements and all appendices, re-litigated past decisions and assumptions, and reviewed all notes and training materials to make sure our utility and program were built appropriately.

In our review we found an assumption that was made the summer of 2017 and affirmed in 2018. The Council and staff elected to utilize DEP values in calculating our Total Suspended Sediment which is a function of total area in the Borough and impervious area. These calculations are what determine the total sediment reduction requirements previously stated as 142,217 lbs. in the approved PRP. In 2017 and again in 2018 Council and staff elected to use the assumed values because the significant costs of mapping the entire Borough to determine actual values made the potential return negative and experts in the field had provided guidance that DEP assumed values are overwhelmingly more favorable than actual values.

Our Greenfield review brought to light that the Borough now possessed mapping of the Borough that was performed internally at no costs and audited by the Borough Engineer, Frederick Seibert & Associates. The Borough Engineer was asked to run the numbers and confer with DEP to determine our actual values against DEP assumed values to see which would be more favorable to the Borough.

**The end result of running the analysis and conferring with DEP the Borough's actual values from the mapping are much more favorable than DEP assumed values. The Borough's new sediment reduction total will be ~93,805 lb. in the first 5 year permit cycle down from 142,217 lb. This results in a reduced annual need for the Stormwater Utility by \$150,000.00 per year, down to \$630,000.00 per annum from \$780,000.00 per annum.**

Procedurally the Borough will need to formally amend the Pollutant Reduction Plan which will require public hearings and Council action and ultimately DEP approval. The numbers stated above are sufficient for budgeting and planning purposes.

## **Financial**

A result of the above is that the Stormwater Utility Fund needs \$630,000.00 annually down from \$780,000.00 as previously reported. The costs for stream restoration have been revised to reflect the new sediment reduction requirements and the long range budget and revenue plan have also been updated. <sup>4</sup>

## **Conclusions**

The MS4 program and development of the Stormwater Utility has been very comprehensive with many moving parts. Additionally, to save costs the Borough Council elected not to utilize filed experts not already contracted with the Borough. This leaves the development of the program to staff generalists and the elected officials. Furthermore, the development of the Stormwater Utility and MS4 program has been done so publicly creating much anxiety for the entire community as details have slowly emerged. The community can have faith that the Stormwater Utility and MS4 program have been built carefully and thoroughly with many dedicated individuals committed to fiscal responsibility and program efficiency.

## **List of Exhibits**

Total Suspended Sediment Calculations

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<sup>4</sup> Stormwater Utility Budget with Revenue Plan 052819