



31 August 2015

Department of Environmental Protection
Bureau of Point and Non-Point Source Management
Rachel Carson State Office Building
P. O. Box 8774
Harrisburg PA 17105-8774

Our ref: 110/38001/
Your ref: PAG-13

Dear Sir/Madam

NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems
General Comments

We appreciate the opportunity to provide comments on the draft NPDES General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems, PAG-13.

1. The draft Permit Appendix E is ambiguous as to the required reduction requirements for impaired waters. If waters are impaired as listed in the draft "MS4 Requirements Table" with requirements per Appendix E, are both of the reductions required (phosphorus and sediment) if the cause of the impairment is specifically listed as only "Nutrients" or only "Siltation" or "Suspended Solids"? Also, if the cause is listed only as "Excessive Algal Growth" or "Organic Enrichment/Low D.O.", do both or either of the phosphorus and sediment reduction requirements apply? It is suggested that the reduction requirements are clarified.
2. The draft PRP instructions penalize current MS4 permittees with draft CBPRPs that want to implement BMPs now by shifting the baseline pollutant loading to the date of the NOI submission. For current MS4 permittees with draft CBPRP that have been submitted to DEP, but not reviewed or approved, any BMPs implemented prior to the new Permit will only count as a fraction if the baseline is shifted. This will likely cause any permittee to delay BMP implementation, which is an unwanted effect. It is suggested that the requirements are modified to allow any BMPs implemented after 2005 (consistent with the current and effective Chesapeake Bay PRP Instructions) to count toward the percent reduction requirements for the first permit cycle.
3. The draft PRP instructions include Attachment A, which provides a table for developed land loading rates for PA counties from CAST. These rates result in significantly higher loads than using the loading rates provided in the PA Stormwater BMP Manual. Toward the end of section II.D (top of page 4), the instructions state that "If land use-based loading rates are available, these rates may be used to possibly yield a more accurate estimate." The next paragraph states that "If a modeling tool will be used to evaluate future pollutant loading for different BMP implementation scenarios, the modeling tool should be used to estimate baseline loading as well..." However, section II.E.2 states that "applicants within the Chesapeake Bay watershed must use BMP effectiveness values identified by the Chesapeake Bay Program, available through CAST..." It is suggested to clarify whether or not the rates and percent

reductions from the PA Stormwater BMP Manual can be used for Appendix D (Chesapeake Bay Watershed) pollutant reduction plans.

4. It is suggested to implement the recommendations provided by the Navy Region Mid-Atlantic on July 29, 2015, in general and specifically relative to “waters of the Commonwealth” and calculating existing baseline pollutant loading.
5. It is suggested that the PA Stormwater BMP Manual is revised and published as soon as possible for use by permittees to create the required pollutant reduction plans.

Thanks for your consideration of these comments.

Sincerely
GHD Inc.



Jared C. Hockenberry, PE

Sr. Project Engineer
717-585-6391