




**MS4 INSPECTION REPORT**

Permit Number	Inspection Date	Entry Time	Exit Time	Inspection Type	Inspection ID
PAI132215	08/19/2021	09:00	11:39	CEI	3236849
Municipality	Bath		County	Northampton	
Facility Name	BATH BORO. NORTHAMPTON COUNTY MS4		Permittee Name	BATH BORO NORTHAMPTON CNTY	
24-Hour Emergency Contact Person/Phone	Brad Flynn / (610) 837-6525		Email	manager@boroughofbath.org	
Physical Location Address	URBANIZED AREA BETHLEHEM 3, BATH BORO, PA				
Permit Expiration Date	10/31/2018	Next Submittal ---- Due Date	----		
<b>Overdue Permit Schedules</b>					
Type: Submit MS4 Progress Report			Due Date: 12/31/2016		
Type: Submit MS4 Progress Report			Due Date: 05/04/2018		
<b>Violations*</b>	No Violations Noted				
					
<b>Recommendations</b>					
Please update the responsible party by contacting the Departments Clean Water Program permitting section.					
Person Interviewed Brad Flynn	Date 08/19/2021	Inspector SCOTT CONFER	Date 08/19/2021		
Signature 	Phone Number (610) 837-6525	Signature 	Phone Number (610) 861-2135		
Title Borough Manager	Title WTR QLTY SPCST				
Email manager@boroughofbath.org	Email scconfer@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. *Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and/or review of Department records.					

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Facility Details Section			
<b>Responsible Official</b>	----	<b>Title</b>	BORO MGR
<b>Business Phone</b>	(610) 837-6525	<b>Email</b>	----
<b>Permittee Address</b>	121 S WALNUT ST, BATH, PA, 18014-1020		
<b>Certified Operator</b>	----	<b>Client ID</b>	----
<b>Certificates</b>	----	<b>Certification Status</b>	----
		<b>Expiration Date</b>	--/--/----
<b>Is a Copy of the permit(s) on-site?</b>			Yes
<b>Has the interviewed operator/person reviewed the facility's permit(s)?</b>			Yes
Comments			
<p>I met with Brad Flynn (Borough Manager) and Mike Schallock (keystone Consulting Engineers) for a compliance evaluation inspection of the Bath Borough MS4 program.</p> <p>After reviewing the records in the office we went and inspected the Boroughs maintenance building. Light maintenance is performed inside. The drains located inside the maintenance building have been closed up for several years. The drains were concreted shut and covered with a metal plate. There are two 55 gallon drums on secondary containment pallets. The spent fluids are removed as needed by a waste hauler. There is no evidence of any spills inside. The Borough has several spill kits on-site. The maintenance building was kept inside and out. I also inspected the salt shed located on-site. The salt was at least 15 feet from the opening of the shed. The salt pile was covered with a tarp so no salt is exposed to any elements.</p> <p>Our next stop in the field was to inspect Outfall 003 located at Mill Street and discharges into the Monacacy Creek. Outfall 003 was inspected. The outfall is well maintained and no issues to report.</p> <p>Also one stormwater inlet was inspected on Mill Street. The stormwater inlet was free and clear of any debris. All the stormwater inlets are tagged with an identification number.</p> <p>The borough has a street sweeper and a street sweeping policy in place. The street sweeper goes out weekly and as needed also.</p> <p>Stormwater inlets are inspected every morning and after heavy periods of rainfall. The inspections and cleanings are documented on forms and submitted to the Borough Manager.</p>			
<b>Participants:</b>			
Mike Schallock (Keystone Consulting Engineers), Brad Flynn (Borough Manager)			

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01 Annual Status Report: 003 - MONOCACY CREEK OUTFALL

Annual Status Report

ASR-1	Has the Permittee submitted their most recent Annual Status Report in compliance with their permit	Yes	
ASR-2	Date the most recent Annual Status Report was received	12/22/2020	
ASR-3	Did the most recent Annual Status Report contain any administrative deficiencies identified by the reviewer	No	
ASR-6	Is the Annual Status Report made available for public review by the Permittee	Yes	

02 PRP & TMDL Plan: 003 - MONOCACY CREEK OUTFALL

PRP & TMDL Plan

PRP-1	Is the Permittee required to have a Pollution Reduction Plan (PRP)	Yes	
PRP-2	Is the PRP available for review	Yes	
PRP-3	Has the PRP been updated since permit issuance	No	
PRP-5	Describe steps taken by Permittee to implement PRP <b>Notes:</b> The Borough is waiting on their new permit to implement the PRP.	See comments	
PRP-6	Is the Permittee required to have a Total Maximum Daily Load (TMDL) Plan	No	

03 MCM 1 (PEOP): 003 - MONOCACY CREEK OUTFALL

MCM 1

MCM1-1	Has the permittee developed and implemented a written Public Education and Outreach Program (PEOP)	Yes	
MCM1-2	Is the PEOP reviewed, evaluated, and revised annually	Yes	
MCM1-3	Date of last PEOP review or update	January 2020	
MCM1-4	Has the permittee developed a list of target audiences that are present within the areas served by the MS4	Yes	
MCM1-5	Does the list include residents, businesses, developers, schools, and municipal employees	Yes	
MCM1-6	Is the list reviewed and updated annually	Yes	
MCM1-7	Date of last review or update of the list of target audiences	January 2020	
MCM1-8	Has the permittee annually published at least one issue of a newsletter, a pamphlet, a flyer, or a website <b>Notes:</b> A newsletter gets mailed to all residents and businesses twice per year. Website and pamphlets.	Yes	
MCM1-9	Does the publication include general stormwater information	Yes	
MCM1-10	Does the publication include a description of permittee's SWMP	Yes	
MCM1-			

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11	Does the publication include information about permittee's stormwater management activities	Yes	
MCM1-12	Has the permittee additionally implemented an alternative publication <b>Notes:</b> The Borough is getting a new LED video board and will post MS4 information to educate the public.	Yes	
MCM1-13	Is the list of published material made available to the public	Yes	
MCM1-14	Is the list of published material reviewed, updated, and maintained annually	Yes	
MCM1-15	Date of last review or update for the list of published material	January 2021	
MCM1-16	Do all publications contain stormwater educational information that address at least 1 MCM	Yes	
MCM1-17	Has the permittee distributed stormwater educational materials and/or information to the target audiences using a variety of distribution methods <b>Notes:</b> A newsletter gets mailed to all residents and businesses twice per year. Website and pamphlets.	Yes	
MCM1-18	Has the permittee selected and utilized at least two distribution methods annually, in addition to those required by BMP #3	Yes	
MCM1-19	Describe additional distribution methods <b>Notes:</b> The Borough is getting a new LED video board and will post MS4 information to educate the public.	See comments	
MCM1-20	Does the PEOP demonstrate measurable improvements in target audience's understanding of stormwater impacts	Yes	

**04 MCM 2 (PIPP): 003 - MONOCACY CREEK OUTFALL**

**MCM 2**

MCM2-1	Has the permittee developed and implemented 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	Yes	
MCM2-2	Is the PIPP evaluated and revised annually	Yes	
MCM2-3	Date the PIPP was last evaluated and revised	January 2021	
MCM2-4	Does the PIPP include opportunities for public participation	Yes	
MCM2-5	Does the PIPP include methods of routine conversation with shareholders	Yes	
MCM2-6	Has the permittee made MS4 program materials available to public or upon request	Yes	
MCM2-7	Has the permittee advertised to the public and solicited public input on ordinances, SOPs, and PRP prior to adoption or submission to DEP	Yes	
MCM2-8	For Ordinances and SOPs, has the permittee provided notice to the public, opportunities for public comment, documented and evaluated the public comments, and documented the permittee responses to comments prior to finalizing the documents	Yes	
MCM2-9	For PRPs, has the permittee complied with public participation requirements specified in Appendices D and E of the permit	Yes	
MCM2-10	Does the permittee regularly solicit public involvement and participation from target audience groups using available distribution and outreach methods	Yes	
MCM2-11	Does the permittee solicit public reporting of illicit discharges	Yes	
MCM2-12	Does the permittee assist the public in their efforts to help implement SWMP	Yes	
MCM2-	Has the permittee documented and reported instances of cooperation and participation of local		

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13	organizations or members of the public	Yes	
<b>05 MCM 3 (IDD&amp;E): 003 - MONOCACY CREEK OUTFALL</b>			
<b>MCM 3</b>			
MCM3-1	Has the permittee developed and implemented a written Illicit Discharge Detection and Elimination (IDD&E) program	Yes	
MCM3-2	Does the IDD&E program include procedures for identifying priority areas	Yes	
MCM3-3	Does the IDD&E program include procedures for screening outfalls in priority areas	Yes	
MCM3-4	Does the IDD&E program include procedures for identifying the source of an illicit discharge when a contaminated flow is detected	Yes	
MCM3-5	Does the IDD&E program include procedures for eliminating an illicit discharge	Yes	
MCM3-6	Does the IDD&E program include 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	Yes	
MCM3-7	Does the IDD&E program include mechanisms for gaining access to private property to inspect outfalls	Yes	
MCM3-8	Does the IDD&E program include procedures for program documentation, evaluation and assessment	Yes	
MCM3-9	Does the IDD&E program include procedures for addressing information or complaints received from the public	Yes	
MCM3-10	Has the IDD&E program continued to be implemented and evaluated annually	Yes	
MCM3-11	Date the IDD&E was last evaluated	January 2021	
MCM3-12	Has the permittee developed and maintained maps that include permittee and urbanized area boundaries, location and number of all outfalls, location and names of all receiving surface waters**	Yes	
MCM3-13	Have the IDD&E program map(s) been updated and maintained annually	Yes	
MCM3-14	Date the last time IDD&E program map(s) were updated	February 19, 2021	
MCM3-15	Has the permittee developed and maintained map(s) that show the entire storm sewer collection system within the permittee's jurisdiction that are owned or operated by the permittee**	Yes	
MCM3-16	Do the maps include components of the storm sewer collection system including but not limited to roads, inlets, piping, swales, catch basins, channels	Yes	
MCM3-17	Do the maps include privately-owned components of the collection system where conveyances or best management practices (BMPs) on private property receive stormwater flows from upstream publicly-owned components	Yes	
MCM3-18	Have the storm sewer collection system maps been updated and maintained annually	Yes	
MCM3-19	Date the storm sewer collection system map(s) were last updated	February 19, 2021	
MCM3-20	Does the permittee conduct dry weather screenings of its MS4 outfalls to evaluate the presence of illicit discharges	Yes	
MCM3-21	Does the dry weather screening program include identification of illicit discharge sources	Not Observed	
MCM3-22	Does the dry weather screening program include actions to remove or correct any illicit discharges	Yes	
MCM3-23	Does the dry weather screening program include responses to reports received from the public or other agencies of suspected or confirmed illicit discharges	Yes	
MCM3-24	Does the dry weather screening program include implementation of enforcement actions if	Yes	

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24	necessary		
MCM3-25	Does the dry weather screening program include reporting to DEP when necessary	Yes	
MCM3-26	Has dry weather screening occurred for each identified outfall within the frequency outlined in the permit	Yes	
MCM3-27	Has an inspection or sampling resulted from any outfalls discharging during dry weather screenings	Not Applicable	
MCM3-28	Does the permittee keep records of outfall observations each time an outfall is screened, regardless of the presence of dry weather flow, for 5 years	Yes	
MCM3-29	Is a summary submitted with the Annual MS4 Status Reports that contains the results of outfall inspections and actions taken to remove or correct illicit discharges	Yes	
MCM3-30	Are observation points used if any outfall is inaccessible	Yes	
MCM3-31	Has the permittee enacted 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	Yes	
MCM3-32	Has notification been 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	Not Applicable	
MCM3-33	Does the permittee provide educational outreach to target audiences about the program to detect and eliminate illicit discharges	Yes	

**06 MCM 4 (Construction): 003 - MONOCACY CREEK OUTFALL**

**MCM-4**

MCM4-1	Does the permittee have a protocol in place to require responsible parties to have valid NPDES Permit coverage (i.e., not expired) under 25 Pa. Code Chapter 102 prior to issuing a building or other permit or final approval to those proposing or conducting earth disturbance activities	Yes	
MCM4-2	Does the permittee have a protocol in place to notify DEP or the applicable 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	Yes	
MCM4-3	Has the permittee enacted an ordinance or developed a standard operating procedure (SOP) to require the implementation and maintenance of erosion and sediment control BMPs	Yes	
MCM4-4	Date the ordinance was enacted or SOP was put in place	December 3, 2018	
MCM4-5	Is the permittee implementing and enforcing the ordinance or requiring the implementation of erosion and sediment control BMPs	Yes	

**07 MCM 5 (PCSM): 003 - MONOCACY CREEK OUTFALL**

**MCM 5**

MCM5-1	Has the permittee enacted an ordinance or developed an SOP to require post-construction stormwater management from new development and redevelopment projects	Yes	
MCM5-2	Is the permittee implementing and enforcing an ordinance or SOP to require the implementation and maintenance of post-construction stormwater management (PCSM) BMPs	Yes	
MCM5-3	Has the permittee developed and implemented measures to encourage and expand the use of low impact development (LID) in new development and redevelopment	Yes	
MCM5-4	Do the measures encourage retrofitting LID into existing development	Yes	
MCM5-5	Do the measures enact ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices	Yes	
MCM5-6	Does the permittee have a program in place to ensure adequate operation and maintenance (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?	Yes	
MCM5-7	Has the permittee developed an inventory of PCSM BMPs	Yes	

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MCM5-8	Is the PCSM BMP inventory regularly updated and maintained annually	Yes	
MCM5-9	Date of last PCSM BMP inventory update	September 2020	
MCM5-10	Does the inventory include all PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003	Yes	
MCM5-11	Does the inventory include the exact location of the PCSM BMP (e.g., latitude and longitude, with street address)	Yes	
MCM5-12	Does the inventory include Information (e.g., name, address, phone number(s)) for BMP owners and entities responsible for BMP O&M, if different from BMP owners	Yes	
MCM5-13	Does the inventory include the type of BMP and the year it was installed	Yes	
MCM5-14	Does the inventory include maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources	Yes	
MCM5-15	Does the inventory include the actual inspection/maintenance activities conducted for each BMP	Yes	
MCM5-16	Does the inventory include 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	Yes	

08 MCM 6 (Housekeeping): 003 - MONOCACY CREEK OUTFALL

MCM 6

MCM6-1	Has the permittee identified and inventoried all operations that are owned or operated by the permittee and have the potential for generating stormwater runoff to the regulated MS4	Yes	
MCM6-2	Is the operations inventory reviewed and updated annually	Yes	
MCM6-3	When was the operations inventory last reviewed and updated	January 2021	
MCM6-4	Has the permittee developed and implemented a written operation and maintenance (O&M) program for all operations that could contribute to the discharge of pollutants from the MS4	Yes	
MCM6-5	Does the O&M program include management practices, policies, and procedures to reduce or prevent the discharge of pollutants to the MS4	Yes	
MCM6-6	Does the O&M program include maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach the MS4	Yes	
MCM6-7	Does the O&M program include 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	Yes	
MCM6-8	Does the O&M program include procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris	Yes	
MCM6-9	Does the O&M program get reviewed and updated annually	Yes	
MCM6-10	When was the O&M program last reviewed and updated?	January 2021	
MCM6-11	Has the permittee developed and implemented an employee training program	Yes	
MCM6-12	Does the training program include the MS4 topics of Operation, Inspection, Maintenance and Repair, and the Permittee's stormwater management plan	Yes	
MCM6-13	Is the training program conducted, reviewed, and updated annually	Yes	
MCM6-14	When was the training program last reviewed and updated	January 2021	

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MCM6-15	Does the employee training documentation include dates, names of attendees, names of presenters, and topics covered	Yes	
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10 Operations (Field): 003 - MONOCACY CREEK OUTFALL

Operations

OPS-1	Is a municipal operation being inspected during this inspection	Yes	
OPS-2	What is the type of municipal operation inspected <b>Notes:</b> The maintenance building and salt storage shed.	See comments	
OPS-3	What is the location of the municipal operation inspected	Lat: 40.726676 Long: -75.392026	
OPS-4	Does the municipal operation have a written operation and maintenance (O&M) plan present	Yes	
OPS-5	Are pollution prevention and good housekeeping measures described in the O&M plan implemented onsite	Yes	
OPS-6	Are all polluttional materials (raw materials, products, or wastes/dusts) stored onsite covered or contained	Yes	
OPS-7	Are all wastes generated onsite properly disposed of	Yes	
OPS-8	Is the site of the municipal operation free from existing erosion problems	Yes	
OPS-9	Describe outfalls and discharges from the municipal operation site	No outfalls	
OPS-10	Are all discharges free from sheen, foams, and discoloration	Not Applicable	

11 Outfall (Field): 003 - MONOCACY CREEK OUTFALL

Outfall

OF-1	Is an outfall being inspected during this inspection	Yes	
OF-2	Is the outfall inventoried, mapped, and numbered	Yes	
OF-3	What is the outfall number	Outfall 003	
OF-4	What is the location of the outfall	Lat: 40.723431 Long: -75.394505	
OF-5	Is the outfall structure well maintained	Yes	
OF-6	Is the outfall free from existing erosion problems	Yes	
OF-7	Is the outfall dry, or discharge free from sheen, foams, and discoloration	Yes	
OF-8	Are there any upstream and downstream observations <b>Notes:</b> The upstream and downstream observations were good. No issues to report.	See comments	
OF-9	Has this Outfall been sampled as required by the permit	Not Applicable	
OF-10	Does it appear the permittee's sampling point for this outfall representative of entire drainage	Yes	

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area

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**Inspection Images**



Photo #: OPS-2 10 Operations (Field)-003 Description: Salt storage shed Photo taken by SCOTT CONFER



Photo #: OF-3 11 Outfall (Field)-003 Description: Outfall 003 Photo taken by SCOTT CONFER



Photo #: 11 Outfall (Field)-003 Description: stormwater inlet located on Mill street Photo taken by SCOTT CONFER



Photo #: 11 Outfall (Field)-003 Description: each stormwater inlet has a designation tag Photo taken by SCOTT CONFER