

MS4 INSPECTION REPORT

Permit Number	Inspection Date	Entry Time	Exit Time	Inspection Type	Inspection ID
PAI130026	11/21/2024	09:30	12:20	CEI	3870955
Municipality	West Chester		County	Chester	
Facility Name	WEST CHESTER BORO MS4		Permittee Name	BORO OF WEST CHESTER	
24-Hour Emergency Contact Person/Phone	/		Email	----	
Physical Location Address	401 E GAY ST, WEST CHESTER, PA, 19380-2729				
Permit Expiration Date	05/31/2029	Next Submittal Annual Report DueDate	09/30/2025		
Overdue Permit Schedules					
Type: MS4 - Submit Annual MS4 Status Report			Due Date: 09/30/2024		
Violations*					
 No Violations Noted					
Recommendations					
*Please see full report sent in a separate email.					
*See Notes 1 to 5 within the report.					
*Please submit the Final report for the PRP and TMDL by 01/31/2025.					
*Please disregard the "Overdue Permit Schedule" comments, as they were generated as a result of a system error.					
Person Interviewed Don Edward's	Date 11/21/2024	Inspector GWENDOLYN ROSE STOLTZ	Date 11/21/2024		
Signature Not present when finalized	Phone Number (610) 696-5282	Signature 	Phone Number (484) 250-5134		
Title Public Works Director	Title ENVTL PRO CMLPNC SPCST				
Email dedwards@west-chester.com	Email gwstoltz@pa.gov				
<p>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.</p>					

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Facility Details Section			
Responsible Official	SEAN METRICK	Title	BOROUGH MANAGER
Business Phone	(610) 436-1353	Email	mperrone@west-chester.com
Permittee Address	401 E GAY ST, WEST CHESTER, PA, 19380-2729		
Certified Operator	----	Client ID	----
Certificates	----	Certification Status	----
		Expiration Date	--/--/----
Is a Copy of the permit(s) on-site? -----			
Has the interviewed operator/person reviewed the facility's permit(s)? -----			
Comments			
<p>A routine MS4 inspection was conducted on November 21, 2024, to evaluate compliance with Permit PAI130026. Beth Mahoney, DEP Environmental Group Manager; Ian Quinlan, DEP Environmental Engineer; Carrie Konnovitich, PE, DEP Environmental Engineering Specialist; and I, Gwendolyn Stoltz, DEP Environmental Protection Compliance Specialist, met with West Chester Borough staff at the West Chester Borough municipal building located at 401 East Gay Street West Chester, PA 19380. Minimum Control Measures (MCMs) #1 to #6, Appendix B requirements, Pollutant Reduction Plan (PRP), and Total Maximum Daily Load (TMDL) plan were reviewed in office. The Borough's Public Works facility, Borough Hall BMP, Veterans Park BMP, Greenfield Park BMP, and Public Works BMPs were inspected in field.</p>			
Participants:			
Don Edwards (Public Works Director), Don Anderson (Assistant Public Works Dir), Kelly Goff (Borough Engineer)			

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01 Annual Status Report: 001 - OUTFALL 001

Annual Status Report

ASR-1	Has the permittee submitted Annual Status Reports in compliance with their permit?	Yes	
ASR-2	Date the most recent Annual Status Report was received.	09/23/2024	
ASR-3	Did the most recent Annual Status Report contain any administrative deficiencies identified by the reviewer?	No	
ASR-6	Has the permittee made the Annual Status Report available for public review?	Yes	

03 MCM 1 (PEOP): 001 - OUTFALL 001

MCM 1

MCM 1-13	Has the permittee additionally distributed educational materials to target audiences using at least 2 distribution methods in addition to those required to meet BMP #3?	Yes	
MCM1-1	Has the permittee developed and implemented a written Public Education and Outreach Program (PEOP)?	Yes	
MCM1-2	Has the permittee reviewed, evaluated, and revised the PEOP annually?	Yes	
MCM1-3	Date of last PEOP review. Date of last PEOP update.	August 2024	
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	Has the permittee reviewed and updated the list annually?	Yes	
MCM1-7	Dates of last review and last update of the list of target audiences.	August 2024	
MCM1-8	Has the permittee annually published at least one issue of a newsletter, a pamphlet, a flyer, or a website?	Yes	
MCM1-9	Which type(s) of publication has the permittee used?	Other Pamphlets Flyer Website	
MCM1-10	Has the permittee included general stormwater information in the publication?	Yes	
MCM1-11	Has the permittee included a description of the permittee's Stormwater Management Plan (SWMP) in the publication?	Yes	
MCM1-12	Has the permittee included information about the permittee's stormwater management activities in the publication?	Yes	
MCM1-14	Which distribution methods has the permittee used?	Other Brochures Meetings Fact sheets	
MCM1-15	Has the permittee annually reviewed and updated the list of published material?	Yes	
MCM1-16	Dates of last review and last update for the list of published material.	August 2024	

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MCM1-17	Has the permittee included stormwater educational information that address at least 1 MCM in all publications?	Yes	
MCM1-18	Does the PEOP demonstrate measurable improvements in target audience's understanding of stormwater impacts? Describe how in remarks section.	Not Observed	

Additional Notes: Note 2: The Borough notes that discussion about stormwater occurs at public meetings that are live streamed. The Borough notes that these meetings seem to be the most effective way to reach the public about stormwater issues. Note 3: During the field inspection, multiple instances of pet waste on sidewalks were observed. DEP recommends educating the public about proper disposal of pet waste. The Borough can then see if the number of incidents of improper pet waste disposal reduces after public outreach. The Borough should consult their pet waste ordinance regarding enforcement action of improperly disposed of pet waste.

04 MCM 2 (PIPP): 001 - OUTFALL 001

MCM 2

MCM2-1	Has the permittee developed and implemented a written Public Involvement and Participation Program (PIPP)?	Yes	
MCM2-2	Does the PIPP describe various types of possible participation activities?	Yes	
MCM2-3	Does the PIPP describe methods of encouraging public involvement?	Yes	
MCM2-4	Does the PIPP describe methods of soliciting input from the public?	Yes	
MCM2-5	Has the permittee evaluated and revised the PIPP annually?	Yes	
MCM2-6	Dates the PIPP was last evaluated and last revised.	August 2024	
MCM2-7	Does the PIPP include opportunities for the public to participate in the decision-making processes associated with activities related to the permit?	Yes	
MCM2-8	Has the permittee included methods of routine conversation with shareholders in the PIPP?	Yes	
MCM2-9	Has the permittee made MS4 program materials available to the public or upon request?	Yes	
MCM2-10	Has the permittee advertised to the public and solicited public input on ordinances, SOPs, and PRP prior to adoption or submission to DEP?	Yes	
MCM2-11	Has the permittee documented and evaluated all public comments submitted for any ordinance, SOP and PRP prior to adoption or submission to DEP?	Yes	
MCM2-12	Does the permittee regularly solicit public involvement and participation from target audience groups using available distribution and outreach methods?	Yes	
MCM2-13	Does the permittee solicit public reporting of illicit discharges?	Yes	
MCM2-14	Does the permittee assist the public in their efforts to help implement the SWMP?	Yes	
MCM2-15	Has the permittee documented and reported instances of cooperation and participation by local organizations or members of the public? Describe in remarks section.	Yes	

05 MCM 3 (IDD&E): 001 - OUTFALL 001

MCM 3

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MCM-38	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	
MCM-39	Does the permittee provide educational outreach to target audiences about the program to detect and eliminate illicit discharges?	Yes	
MCM3-1	Has the permittee developed and implemented a written Illicit Discharge Detection and Elimination (IDD&E) program?	Yes	
MCM3-2	Is the permittee implementing the IDD&E program?	Yes	
MCM3-3	Is the permittee enforcing the IDD&E program?	Yes	
MCM3-4	Has the permittee included procedures for identifying priority areas in the IDD&E program?	Yes	
MCM3-5	Has the permittee included procedures for screening outfalls in priority areas in the IDD&E program?	Yes	
MCM3-6	Has the permittee included procedures in the IDD&E program for identifying the source of an illicit discharge when a contaminated flow is detected?	Yes	
MCM3-7	Has the permittee included procedures in the IDD&E program for eliminating an illicit discharge?	Yes	
MCM3-8	Has the permittee included procedures in the IDD&E program 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	
MCM3-9	Has the permittee included mechanisms in IDD&E program for gaining access to private property to inspect outfalls?	Yes	
MCM3-10	Has the permittee included procedures in the IDD&E program for program documentation, evaluation and assessment?	Yes	
MCM3-11	Are records being kept of outfall inspections?	Yes	
MCM3-12	Are records being kept of flows observed?	Yes	
MCM3-13	Are records being kept of field screening and testing results?	Yes	
MCM3-14	Are records being kept of investigation and corrective action work performed under this program?	Yes	
MCM3-15	Has the permittee included procedures in the IDD&E program for addressing information or complaints received from the public?	Yes	
MCM3-16	Has the permittee continued to implement and evaluate the IDD&E program annually?	Yes	
MCM3-17	Date the IDD&E program was last evaluated	August 2024	
MCM3-18	Has the permittee developed maps that include permittee urbanized area boundaries, location and number of all outfalls, location and names of all receiving surface waters? **	Yes	
MCM3-19	Are the existing maps being updated and maintained when necessary during each year of coverage under the permit?	Yes	
MCM3-20	Date the IDD&E program map(s) were last updated.	June 2024	
MCM3-21	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	
MCM3-22	Has the permittee included components of the storm sewer collection system including but not limited to roads, inlets, piping, swales, catch basins, and channels on the maps?	Yes	

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MCM3-23	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	
MCM3-24	Have the storm sewer collection system maps been updated and maintained as necessary during each year of coverage under the permit?	Yes	
MCM3-25	Date the storm sewer collection system map(s) were last updated	June 2024	
MCM3-26	Does the permittee conduct dry weather screenings of its MS4 outfalls to evaluate the presence of illicit discharges?	Yes	
MCM3-27	Does the dry weather screening program include identification of illicit discharge sources?	Yes	
MCM3-28	Does the dry weather screening program include actions to remove or correct any illicit discharges?	Yes	
MCM3-29	Does the dry weather screening program include responses to reports received from the public or other agencies of suspected or confirmed illicit discharges?	Yes	
MCM3-30	Does the dry weather screening program include implementation of enforcement actions if necessary?	Yes	
MCM3-31	Does the dry weather screening program include reporting to DEP when necessary?	Yes	
MCM3-32	Has dry weather screening occurred for each identified outfall within the frequency outlined in the permit?	Yes	
MCM3-33	Has an inspection or sampling resulted from any outfalls discharging during dry weather screenings?	Yes	
MCM3-34	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	
MCM3-35	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	
MCM3-36	Are observation points used if any outfall is inaccessible	Yes	
MCM3-37	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	

06 MCM 4 (Construction): 001 - OUTFALL 001

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	09/21/2022	
MCM4-5	Is the permittee implementing and enforcing the ordinance or requiring the implementation of erosion and sediment control BMPs?	Yes	
MCM4-6	Is the ordinance consistent with DEP's 2022 model ordinance in accordance with the due date specified in the permit?	Yes	

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07 MCM 5 (PCSM): 001 - OUTFALL 001

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	Is the ordinance consistent with DEP's 2022 model ordinance in accordance with the due date specified in the permit?	Yes	
MCM5-4	Has the permittee developed and implemented measures to encourage and expand the use of low impact development (LID) in new development and redevelopment?	Yes	
MCM5-5	Do the measures encourage retrofitting LID into existing development?	Yes	
MCM5-6	Are the ordinances consistent with LID practices and repeal sections of ordinances that conflict with LID practices?	Yes	
MCM5-7	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	
MCM5-8	Has the permittee developed an inventory of PCSM BMPs?	Yes	
MCM5-9	Is the PCSM BMP inventory regularly updated and maintained annually?	Yes	
MCM5-10	Date of last PCSM BMP inventory update?	Annually	
MCM5-11	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	
MCM5-12	Does the inventory include the exact location of the PCSM BMP (e.g., latitude and longitude, with street address)?	Yes	
MCM5-13	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	
MCM5-14	Does the inventory include the type of BMP and the year it was installed?	Yes	
MCM5-15	Does the inventory include maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources?	Yes	
MCM5-16	Does the inventory include the actual inspection/maintenance activities conducted for each BMP?	Not Observed	
MCM5-17	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): 001 - OUTFALL 001

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	

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MCM6-3	When was the operations inventory last reviewed and updated?	August 2024	
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?	August 2024	
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?	2024	
MCM6-15	Does the employee training documentation include dates, names of attendees, names of presenters, and topics covered?	Yes	

09 Appendices A, B, and C: 001 - OUTFALL 001

Appendices A, B, & C

ABC-1	Is the Permittee required to have additional pollution control measures (PCMs) for impaired receiving waters?	Yes	
ABC-2	What PCMs are required?	Appendix B	
ABC-3	Has the permittee developed mapping of all outfalls and associated sewersheds that discharge to the impaired waters for each applicable Appendix?	Yes	
ABC-4	Has the permittee developed an inventory of all suspected and known sources of the pollutant, associated with the stream impairment, within the sewersheds that discharge to the impaired waters for each applicable appendix?	Yes	
ABC-5	Has the permittee documented its investigations, sampling, and control efforts into suspected sources in its Annual MS4 Status Report for each applicable appendix?	Not Applicable	
ABC-6	Appendix B only, has the permittee enacted a Stormwater Management Ordinance or SOP that requires proper management of animal wastes on property owned by the permittee?	Yes	

13 PRP TMDL BMP (Field): 008 - OUTFALL 008

PRP TMDL BMP

BMP-1	Is a Pollution Reduction Program (PRP) and/ or a Total Maximum Daily Loads (TMDL) Plan, BMP being inspected during this inspection?	Yes	
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BMP-2	What type of BMP is being inspected?	Rain garden	
BMP-3	Is this BMP inventoried and mapped?	Yes	
BMP-4	What is the name of this BMP?	Borough Hall BMP	
BMP-5	What is the location of the BMP?	Lat: 39.964167 Long: -75.598889	
BMP-6	Has construction of the BMP been completed?	Yes	
BMP-7	Is the BMP well maintained?	Yes	
BMP-8	Responsible party for operation and maintenance of BMP?	Borough	
BMP-9	What activities are required for proper operations and maintenance of BMP?	Per design	
BMP-10	Frequency of activities required for proper operations and maintenance of BMP?	Per design	
BMP-11	Does this BMP appear functional?	Yes	
BMP-12	Is this BMP permanently stabilized?	Yes	
BMP-13	Is this BMP free from existing erosion problems?	Yes	
BMP-14	Is the BMP free from excessive sediment, debris, or trash deposits?	Yes	
BMP-15	Has the BMP been installed as required by Plan?	Not Observed	

13 PRP TMDL BMP (Field): 006 - OUTFALL 006

PRP TMDL BMP

BMP-1	Is a Pollution Reduction Program (PRP) and/ or a Total Maximum Daily Loads (TMDL) Plan, BMP being inspected during this inspection?	Yes	
BMP-2	What type of BMP is being inspected?	Bioswale & Rain Gard	
BMP-3	Is this BMP inventoried and mapped?	Not Observed	
BMP-4	What is the name of this BMP?	PW BMPs	
BMP-5	What is the location of the BMP?	Lat: 39.957100 Long: -75.596400	
BMP-6	Has construction of the BMP been completed?	No	
BMP-8	Responsible party for operation and maintenance of BMP?	Borough	
BMP-9	What activities are required for proper operations and maintenance of BMP?	Per BMP Manual	

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BMP-10	Frequency of activities required for proper operations and maintenance of BMP?	Per BMP Manual	
BMP-13	Is this BMP free from existing erosion problems?	Yes	
BMP-14	Is the BMP free from excessive sediment, debris, or trash deposits?	Yes	

13 PRP TMDL BMP (Field): 013 - OUTFALL 013

PRP TMDL BMP

BMP-1	Is a Pollution Reduction Program (PRP) and/ or a Total Maximum Daily Loads (TMDL) Plan, BMP being inspected during this inspection?	Yes	
BMP-2	What type of BMP is being inspected?	Rain Garden	
BMP-3	Is this BMP inventoried and mapped?	Yes	
BMP-4	What is the name of this BMP?	Veterans Park	
BMP-5	What is the location of the BMP?	Lat: 39.960700 Long: -75.611800	
BMP-6	Has construction of the BMP been completed?	Yes	
BMP-7	Is the BMP well maintained?	Yes	
BMP-8	Responsible party for operation and maintenance of BMP?	Borough	
BMP-9	What activities are required for proper operations and maintenance of BMP?	Per BMP Manual	
BMP-10	Frequency of activities required for proper operations and maintenance of BMP?	Per BMP Manual	
BMP-11	Does this BMP appear functional?	Yes	
BMP-12	Is this BMP permanently stabilized?	Yes	
BMP-13	Is this BMP free from existing erosion problems?	Yes	
BMP-14	Is the BMP free from excessive sediment, debris, or trash deposits?	Yes	
BMP-15	Has the BMP been installed as required by Plan?	Not Observed	

13 PRP TMDL BMP (Field): 001 - OUTFALL 001

PRP TMDL BMP

BMP-1	Is a Pollution Reduction Program (PRP) and/ or a Total Maximum Daily Loads (TMDL) Plan, BMP being inspected during this inspection?	Yes	
BMP-2	What type of BMP is being inspected?	Rain Garden	

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BMP-3	Is this BMP inventoried and mapped?	Yes	
BMP-4	What is the name of this BMP?	Greenfield Park	
BMP-5	What is the location of the BMP?	Lat: 39.955600 Long: -75.594000	
BMP-6	Has construction of the BMP been completed?	Yes	
BMP-7	Is the BMP well maintained?	Yes	
BMP-8	Responsible party for operation and maintenance of BMP?	Borough	
BMP-9	What activities are required for proper operations and maintenance of BMP?	Per BMP Manual	
BMP-10	Frequency of activities required for proper operations and maintenance of BMP?	Per BMP Manual	
BMP-11	Does this BMP appear functional?	Yes	
BMP-12	Is this BMP permanently stabilized?	Yes	
BMP-13	Is this BMP free from existing erosion problems?	Yes	
BMP-14	Is the BMP free from excessive sediment, debris, or trash deposits?	Yes	
BMP-15	Has the BMP been installed as required by Plan?	Not Observed	

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Inspection Images



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Photo #1: 13 PRP TMDL BMP (Field)-008 Description:
Borough Hall Rain Garden Photo taken by GWENDOLYN
ROSE STOLTZ



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Photo #2: 13 PRP TMDL BMP (Field)-008 Description:
Borough Hall Rain Garden bumpout Photo taken by
GWENDOLYN ROSE STOLTZ

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Photo #3: 13 PRP TMDL BMP (Field)-008 Description:
Borough Hall Rain Garden bumpout stepped inflow from
street Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #4: 13 PRP TMDL BMP (Field)-006 Description:
PW Bioswale BMP installation in progress Photo taken
by GWENDOLYN ROSE STOLTZ

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Lat: 39.95710, Long: -75.59720 2024-11-21 11:10:35

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Photo #5: 10 Operations (Field)-001 Description: Drain in parking lot discharges to rain garden being installed Photo taken by GWENDOLYN ROSE STOLTZ



Lat: 39.95710, Long: -75.59730 2024-11-21 11:11:08

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Photo #6: 10 Operations (Field)-001 Description: Salt storage Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #7: 10 Operations (Field)-001 Description: Brine storage Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #8: 10 Operations (Field)-001 Description: Drain in front of maintenance garage discharges to rain garden being installed; petroleum contamination found during excavation to connect pipe to new BMPs Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #9: 10 Operations (Field)-001 Description: Inlet drain collects roof runoff from PW garage; drain clogged with sediment Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #10: 10 Operations (Field)-001 Description: Storage drums; unknown contents Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #11: 10 Operations (Field)-001 Description: Chemical storage drums; labels difficult to find and read Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #12: 10 Operations (Field)-001 Description: Floor drain; PW staff unsure where the drain discharges Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #13: 10 Operations (Field)-001 Description: Vehicle fluid storage Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #14: 10 Operations (Field)-001 Description: Used oil filter storage Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #15: 10 Operations (Field)-001 Description: Vehicle maintenance fluid storage Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #16: 10 Operations (Field)-001 Description: Used motor oil on left Photo taken by GWENDOLYN ROSE STOLTZ

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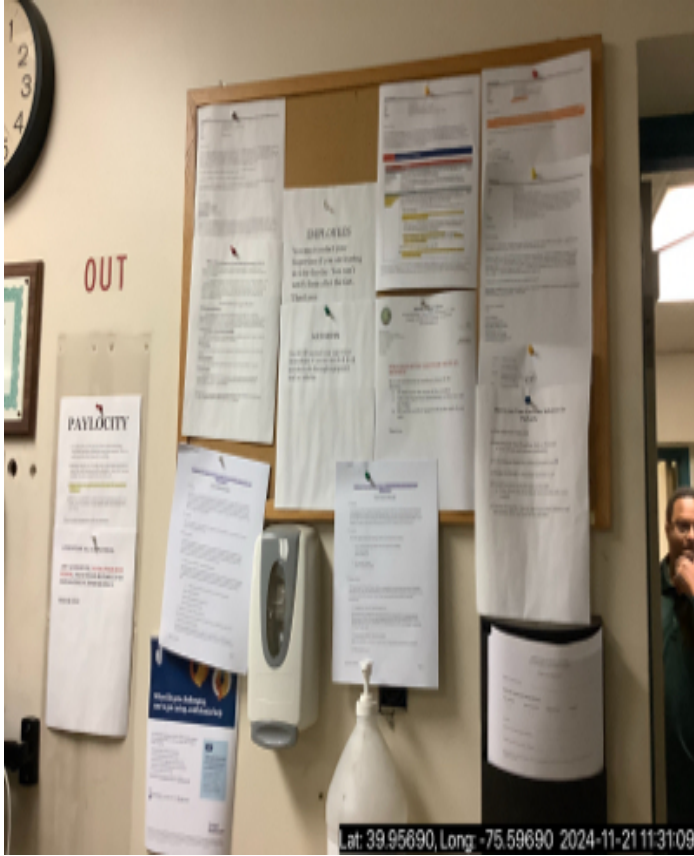
Photo #17: 10 Operations (Field)-001 Description: Labeled as Diesel Exhaust Fluid; PW staff uncertain whether all drums are in use Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #18: 10 Operations (Field)-001 Description: Flammable storage Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #19: 10 Operations (Field)-001 Description: SOPs posted on bulletin board Photo taken by GWENDOLYN ROSE STOLTZ



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Photo #20: 13 PRP TMDL BMP (Field)-006 Description: PW Rain garden BMP installation in progress Photo taken by GWENDOLYN ROSE STOLTZ

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Photo #21: 13 PRP TMDL BMP (Field)-001 Description:
Greenfield Park street-side Rain Garden Photo taken by
GWENDOLYN ROSE STOLTZ



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Photo #22: 13 PRP TMDL BMP (Field)-001 Description:
Greenfield Park parking lot Rain Gardens Photo taken by
GWENDOLYN ROSE STOLTZ

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Photo #23: 13 PRP TMDL BMP (Field)-001 Description:
Greenfield Park Rain Garden inlet drain with filter Photo
taken by GWENDOLYN ROSE STOLTZ



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Photo #24: 13 PRP TMDL BMP (Field)-013 Description:
Veterans Park Rain Garden Photo taken by GWEN-
DOLYN ROSE STOLTZ

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Photo #25: 13 PRP TMDL BMP (Field)-013 Description:

Bioswale pretreats water that flows to the Rain Garden

Photo taken by GWENDOLYN ROSE STOLTZ