Stormwater Pollution Prevention Plan

For

Mendham Township Morris County, New Jersey

Prepared by:

French and Parrello Associates

43A Newburgh Road, Suite 100 Hackettstown, NJ 07840

March 2005 Updated March 2019

Stormwater Pollution Prevention Plan

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Tier A Municipal Stormwater Regulation Program Stormwater Pollution Prevention Team Members Number of team members may vary. Stormwater Program Coordinator: <u>Deborah Bo</u> Title: <u>Township Administrator</u> Office Phone #: <u>973-543-4555</u> Emergency Phone #:	Completed by: <u>Denis Keenan</u> Title: <u>Stormwater Program Coordinator</u> Date: <u>1/12/05 revised 3/26/19</u> Municipality: <u>Mendham Township</u> County: <u>Morris</u> NJPDES #: NJG <u>0150819</u> PI ID #: <u>207157</u>			
Public Notice Coordinator: <u>Maria Coppinger</u> Title: <u>Township Clerk</u> Office Phone #: <u>(973) 543-4555</u> Emergency Phone #:				
Post-Construction Stormwater Management Coordinator: <u>Denis Keenan</u> Title: <u>Township Engineer</u> Office Phone #: <u>908-450-0977</u> Emergency Phone #:				
Local Public Education Coordinator: <u>Deborah Bonanno</u> Title: <u>Township Administrator</u> Office Phone #: <u>(973) 543-4555</u> Emergency Phone #:				
Ordinance Coordinator: <u>Deborah Bonanno</u> Title: <u>Township Administrator</u> Office Phone #: <u>(973) 543-4555</u> Emergency Phone #:				
Public Works Coordinator: <u>David H. Read, Jr.</u> Title: <u>Public Works Superintendent</u> Office Phone #: <u>(973) 543-4509</u> Emergency Phone #:				
Employee Training Coordinator: <u>Deborah Bonanno</u> Title: <u>Township Administrator</u> Office Phone #: <u>(973) 543-4555</u> Emergency Phone #:				
Other: <u>Maria Coppinger</u> Title: <u>Township Clerk</u> Office Phone #: <u>(973) 543-4555</u> Emergency Phone #:				

	SPPP Form 2 – Public Notice						
	Municipality: Mendham Township	County: <u>Morris</u>					
ality tion	NJPDES # : NJG <u>0150819</u> PI ID #: <u>207157</u>						
Municipality Information	Team Member/Title: Maria Coppinger, Township Clerk						
Mu Infe	Effective Date of Permit Authorization (EDPA): 4/1/04						
	Date of Completion: 3/05 Date of most recent update: 6/6/18						

Briefly outline the principal ways in which you comply with applicable State and local public notice requirements when providing for public participation in the development and implementation of your stormwater program.

For meetings where public notice is required under the Open Public Meetings Act ("Sunshine Law," N.J.S.A. 10:4-6 et seq.), Mendham Township provides public notice in a manner that complies with the requirements of that Act. Also, in regard to the passage of ordinances, Mendham Township provides public notice in a manner that complies with the requirements of

N.J.S.A. 40:49-1 et seq. In addition, for municipal actions (e.g., adoption of the municipal stormwater management plan) subject to public notice requirements in the Municipal Land Use Law (N.J.S.A. 40:55D-1 et seq.), Mendham Township complies with those requirements.

SPPP Form 3 – New Development and **Redevelopment Program**

Municipality: Mendham Township

County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: Deborah Bonanno, Township Administrator

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05

Date of most recent update: 6/6/18

Describe in general terms your post-construction stormwater management in new development and redevelopment program (post-construction program), and how it complies with the Tier A Permit minimum standard. This description must address compliance with the Residential Site Improvement Standards for stormwater management; ensuring adequate long-term operation and maintenance of BMPs (including BMPs on property that you own or operate); design of storm drain inlets (including inlets that you install); and preparation, adoption, approval, and implementation of a municipal stormwater management plan and municipal stormwater control ordinance(s). Attach additional pages as necessary. Some additional specific information (mainly about that plan and ordinance(s)) will be provided in your annual reports.

To control stormwater from new development and redevelopment projects throughout Mendham Township (including projects we operate) we will do the following:

We are already ensuring that all new residential development and redevelopment projects that are subject to the Residential Site Improvement Standards for Stormwater Management (including the NJDEP Stormwater Management rules, N.J.A.C. 7:8, referenced in those standards) are in compliance with those standards. Our Municipal Planning and Zoning Boards ensure such compliance before issuing preliminary or final subdivision or site plan approvals under the Municipal Land Use Law.

Since the EDPA, Mendham Township has not constructed any new development or redevelopment projects on Township property. We are currently requiring and will continue to require any storm drain inlets installed either by the Township or by others, to comply with design standards in attachment C of our permit. We will ensure such operation and maintenance for any new development or redevelopment projects on our project by complying with the maintenance requirements in the ordinance. In addition, any storm drain inlets we install for such projects will comply with that ordinance's standards for such inlets.

For any BMP installed Mendham will assure adequate long-term operation as well as preventative and corrective maintenance (including replacement) of BMPs. For any BMPs on private property that we do not own or operate Mendham will ensure this by enforcing the provisions in the municipal ordinance 5-2006, which establishes minimum stormwater management requirements and controls for development projects in the Township of Mendham, that requires the private entity to perform the operation and maintenance, and in the event that the stormwater management facility becomes a danger to public safety or health, or if it is in need of maintenance, the municipality shall so notify the responsible person in writing. Upon receipt of that notice, the responsible person shall have fourteen days to effect maintenance and repair the facility in a manner that is approved by the municipal engineer or his designee.

If the responsible person fails or refuses to perform such maintenance and repair, the municipality or County may immediately proceed to do so and shall assess the cost thereof as additional taxes to the responsible person.

SPPP	Form	4 – L	ocal F	Public	Edu	cat	ion	Program
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Municipality: Mendham Township

County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: Deborah Bonnano, Township Administrator

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05

Date of most recent update: 4/2/18

Local Public Education Program

Describe your Local Public Education Program. Be specific on how you will distribute your educational information, and how you will conduct your annual event. Attach additional pages with the date(s) of your annual mailing and the date and location of your annual event.

Mendham Township plans to conduct the following educational activities to satisfy the local public education requirements of the Municipal Stormwater General Permit

General Public Outreach

Stormwater Website – The Township has created and will maintain a Stormwater Management page on the Township website. The website answers and explains frequently asked questions regarding stormwater management as well as providing a link to www.cleanwaternj.org for further information. (1 Point)

Radio/Television – The Township currently has running advertisements on the community access television (1 Point)

Targeted Audience Outreach

Stormwater Displays – The Township currently has stormwater displays located within the *Municipal Building advertising stormwater management.* (1 Point)

Mailing on Ordinance Education – Distribute a letter from the mayor to every resident and business in the municipality highlighting the requirements and environmental benefits if the Pet Waste, Litter, Improper Disposal of Waste, Wildlife Feeding, Yard Waste, Illicit Connection, Refuse Container, and Private Storm Drain Inlet Retrofitting Ordinances. This letter will also reference a page on the municipal website to which residents can go to read these ordinances. (3 points)

Watershed/Regional Collaboration

Community Activities – The Township has partnered with the Raritan Headwaters for a Stream Clean Up program on April 22, 2018. (3 Points)

Community Activities – The Township has partnered with the Raritan Headwaters for a Stream Clean Up program on April 14, 2018. (3 Points)

SPPP Form 5 – Storm Drain Inlet Labeling

Municipality: Mendham Township

County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: Deborah Bonanno, Township Administrator

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05

Date of most recent update: 6/6/18

Storm Drain Inlet Labeling

Describe your storm drain inlet labeling program, including your labeling schedule, the details of your long-term maintenance plan, and plans on coordinating with watershed groups or other volunteer organizations.

Since the EDPA the Township has been on schedule for the completion of an inlet labeling program. The Township completed the inlet labeling program in 2009. The Township has used the local scout groups and the high school service club to conduct the storm drain inlet labeling program. Where it is practical, they will do the labeling for us on any future areas. In areas where it is not safe for the volunteer groups, the Public Works department will be doing the labeling.

We have labeled all storm drain inlets that are along municipal streets with sidewalks, and all storm drain inlets within plazas, parking areas, or maintenance yards that are operated by Mendham Township. Fifty (50%) percent of the labeling was completed by April 2007, and the remaining fifty (50%) percent was completed by April 2009. During our annual catch basin cleaning program and stormwater facility inspection, we will be checking these labels to ensure that they are still visible, and if they are not, we will ensure that the labels are replaced immediately. For any new storm drain inlet installations, the casting will have a permanent label on it, therefore there will be no need for labeling.

	SPPP Form 6 – MS4 (Outfall Pipe Mapping					
	Municipality: Mendham Township	County: <u>Morris</u>					
ality ion	NJPDES # : NJG <u>0150819</u> PI ID #: <u>207157</u>						
Municipality Information	Team Member/Title: Deborah Bonanno, Township Administrator						
Mu Infe	Effective Date of Permit Authorization	n (EDPA): 4/1/04					
	Date of Completion: 3/05	Date of most recent update: 4/2/19					
Explain how you will prepare your map (include its type and scale, and the schedule							
		vour map (e.g., municipal employees, a					

Mendham Township has successfully completed the outfall pipe mapping in 2009. The Township has compiled a series of maps and date bases which identifies the location, condition of each outfall, presence of debris, scouring, evidence of illicit connections, dry weather flow. Mendham Township, through a service contract, has used a GPS Unit to map out the location of the end of all outfall pipes operated by the municipality. As part of the annual stormwater facility inspection the Township will continue to inspect each outfall for any of the deficiencies mentioned above.

consultant, etc.)?

The Township has a map which shows each outfall identified with an alphanumeric designation. There is a corresponding data base sheet, which has a comprehensive list of the condition, as well as any records of work performed on the outfall. All water bodies receiving outfall pipe discharges have also been identified on the map.

SPPP Form 7 – Illicit Connection Elimination Program

Municipality: Mendham Township

County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: Deborah Bonanno, Township Administrator

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05 Date of most recent update: 4/2/19

Describe your Illicit Connection Elimination Program, and explain how you plan on responding to complaints and/or reports of illicit connections (e.g., hotlines, etc.). Attach additional pages as necessary.

We have conducted an initial physical inspection of all of our outfall pipes during the mapping process. The Township is inspecting all outfalls on a 5 year cycle. During inspection we will be looking for dry weather flow, where there is flow from the outfall when it has not rained in 72 hours. We will use the DEP Illicit Connection Inspection Report Form to conduct these inspections, and each of these forms will be kept with our SPPP records. Outfall pipes that are found to have a dry weather flow or evidence of an intermittent non-stormwater flow will be rechecked again to locate the illicit connection. If we are able to locate the illicit connection (and the connection is within Mendham Township) we will cite the responsible party for being in violation of our Illicit Connection Ordinance, and we will have the collection eliminated immediately. If, after the appropriate amount of investigation, we are unable to locate the source of the illicit connection, we will submit the Closeout Investigation Form with our Annual Inspection and Recertification. If an illicit connection is found to originate from another public entity, Mendham Township will report the illicit connection to the Department.

During the 2018 calendar year, 22 outfalls were identified and inspected for dry weather flow. Laboratory testing of the water was performed to determine if the flow was related to an illicit connection. In each of the locations it was determined that water flow was likely associated with groundwater flows, and an illicit connection was doubtful.

	SPPP Form 8 – Illicit Connection Records				
	Municipality: Mendham Township County: Morris				
ality ion	NJPDES # : NJG 0150819 PI ID #: 207157				
Municipality Information	Team Member/Title: David H. Read, Jr., Superintendent of Public Works				
Mu Infe	Effective Date of Permit Authorization (EDPA): 4/1/04				
	Date of Completion: 3/05 Date of most recent update: 4/2/19				
weath TOTA Total I Numb Numb How m Of the Of the Of the Janua Note: weath Total I Numb How m Of the Janua Numb How m Of the Janua Numb Numb	Attach a copy of each illicit connection report form for outfalls found to have a dry ner flow. L 2018 Inspections unmber of inspections performed this year? 22 er of outfalls found to have a dry weather flow? 22 er of outfalls found to have an illicit connection? 0 nany illicit connections were eliminated? 0 illicit connections found, how many remain? illicit connections found, how many remain? illicit connections found, how many remain? illicit connections performed this year? 317 er of outfalls found to have a dry weather flow? er flow. number of inspections performed this year? 317 er of outfalls found to have a dry weather flow? er of outfalls found to have a dry weather flow? illicit connections were eliminated? illicit connections were eliminated? illicit connections found, how many remain? illicit connections found, how many remain? into 1, 2017 – December 31, 2017 er 4tach a copy of each illicit connection report form for outfalls found to have a dry mer flow. number of inspections performed this year? 23 er of outfalls found to have a dry weather flow? 20 er of outfalls found to have a dry weather flow? 20 er of outfalls found to have a dry weather flow? 20 er of outfalls found to have a dry meratin? illicit connections found, how many remain? N/A illicit conn				

SPPP Form 9 – Yard Waste Ordinance/Collection Program

Municipality: Mendham Township

County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: Deborah Bonanno, Township Administrator

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05 Date of most recent update: 6/6/18

Please describe your yard waste ordinance/collection program. Be sure to include the collection schedule and how you will notify the residents and businesses of this schedule. Attach additional pages as necessary.

The Township Public Works Department conducts brush collection once in the Spring and once in the Fall. Brush must be bundled with string only and bundles must be less than 12" in diameter and 6' in length. The Township accepts yard waste at its DPW maintenance yard year round for the property owners within the Township. This information is available on the Township website.

Mendham Township has adopted and is enforcing a yard waste ordinance that prohibits the placement of non-containerized yard waste in the street.

SPPP Form 10 – Ordinances						
	Municipality: Mendham Township County: Morris					
ality ion	NJPDES # : NJG 0150819 PI ID #: 207157					
Municipality Information	Team Member/Title: Deborah Bonanno, Township Administrator					
Mu Infe	Effective Date of Permit Authorization (EDPA): 4/1/04					
	Date of Completion: 3/05 Date of most recent update: 6/6/18					
	ach ordinance, give the date of adoption. If not yet adopted, explain the opment status:					
	/aste: was adopted 5/2006. Iformation sheets regarding pet waste distributed with pet licenses? Y (X) N ()					
Litter	was adopted 5/2006.					
Impro	oper Waste Disposal: was adopted 5/2006.					
Wildli	fe Feeding: was adopted 5/2006.					
Yard	Waste: was adopted 5/2006.					
Illicit	Connections: was adopted 5/2006.					
Refu	se Containers: 08/09/10					
Priva	Private Catch Basin Retrofitting: 08/09/10					
Fertil	Fertilizer Management: N/A					
How will these ordinances be enforced? Warning or Summons						
Our code enforcement officers and local police officers will enforce these ordinances. If someone is found to be in violation of an ordinance, they will be issued a written warning for first time offenses, and penalties will be issued for subsequent offenses.						

	SPPP Form 11	- Storm	n Drai	in Inlet R	etrofi	tting	
	Municipality: Mendham Township County: Morris						
ality tion	NJPDES # : NJG <u>0150819</u> PI ID #: <u>207157</u>						
Municipality Information	Team Member/Title: <u>Deborah Bonanno, Township Administrator</u> <u>Denis Keenan, Township Engineer</u> Effective Date of Permit Authorization (EDPA): 4/1/04						
	Date of Completion: 3	3/05	Date of	of most recent			
	t type of storm drain inlet						
	ost projects Mendham Tov d) a curb opening with a c						
dimer	1 0	ieur space no i	oigger in	ian iwo inches i	ucross ine	e smallesi	
	aving, repairing,	Projected	Start	Date of	# of	# of storm	
	onstruction	start date	date	completion	storm	drains w/	
or a	Iteration project name				drain	hydraulic	
					inlets	exemptions	
Broo	kden Drive				48	0	
Broo	ckden Place				4	0	
Burr	nett Road				17	0	
Farn	n Drive				3	0	
Sout	ia Road (top of hill to th Rd)				51	0	
Kna	pton Hill				8	0	
Pleasant Valley Way (Brookrace entrance to Borough Line) Stonehouse Road					4	0	
					5	0	
Ting	ley Road				46	0	
	dland Road (Pump ion to Randolph Twp Line)				52	0	

Are you claiming any alternative device exemptions or historic place exemptions for any of the above projects? Please explain:

Mendham Township does not operate any alternative devices within the municipality. At this time we do not plan on installing any such devices for repaving, repairing, reconstruction or alteration projects. We also do not plan on claiming any historic place exemptions.

SPPP Form 12 – Street Sweeping and Road **Erosion Control Maintenance**

Municipality: Mendham Township County: Morris

NJPDES # : NJG 0150819 Municipality

PI ID #: 207157

Information Team Member/Title: David H. Read, Jr., Superintendent of Public Works

Effective Date of Permit Authorization (EDPA): 4/1/04

Date of most recent update: 4/2/19 Date of Completion: 3/05 Street Sweeping

Please describe the street sweeping schedule that you will maintain. (NOTE: Attach a street sweeping log containing the following information: date and area swept. # of miles swept and the total amount of materials collected.)

Mendham Township is currently evaluating all of its streets to determine which areas will need to be swept yearly or monthly. Mendham Township intends on maintaining its existing street sweeping program for all other streets (that are not required by the permit), which includes sweeping all streets twice a year.

In the 2018 Permit year, there were 181 miles of roadway swept, and over 385 cuyds of material disposed of.

Road Erosion Control Maintenance

Describe your Road Erosion Control Maintenance Program, including inspection schedules. A list of all sites of roadside erosion and the repair technique(s) you will be using for each site should be attached to this form. (NOTE: Attach a road erosion control maintenance log containing the following information: location, repairs, date)

Mendham Township will use the Public Works Department to monitor all their roads and streets for erosion problems during normal patrols. All identified road erosion problems will be reported to David H. Read, Jr., the Public Works Department Supervisor. During SPPP Team meetings, identified areas of erosion will be discussed and repairs prioritized. All maintenance personnel will then be assigned to the areas of concern, and the areas identified to have road erosion problems will be repaired in accordance with the Standards for Soil Erosion and Sediment Control in New Jersey. All maintenance personnel will maintain an inspection log, and David H. Read, Jr. will maintain a list of all repairs and the dates completed. The status of the Road Erosion Control Maintenance Program will be included in the Annual Report and Recertification.

S	SPPP Form 13 – Stormwater Facility Maintenance				
	Municipality: Mendham Township County: Morris				
ality	NJPDES # : NJG 0150819 PI ID #: 207157				
Municipality Information	Team Member/Title: David H. Read, Jr., Superintendent of Public Works				
ML	Effective Date of Permit Authorization (EDPA): 4/1/04				
	Date of Completion:3/05Date of most recent update:4/2/19				
	se describe your annual catch basin cleaning program and schedule. Attach a /diagram or additional pages as necessary.				
basii at the then year cleai be se	dham Township has an annual catch basin cleaning program to maintain catch in function and efficiency. All catch basins are inspected once every five years. If, e time of inspection, no sediment, trash or debris is observed in the catch basin, that catch basin will not be cleaned. All catch basins will be inspected every 5 s, even if they were found to be "clean" the previous inspection. At the time of hing, the catch basins will also be inspected for proper function. Maintenance will cheduled for those catch basins that are in disrepair. The catch basin cleaning ram is ongoing.				
	ng the 2018 calendar year there were 540 basins inspected and 126 cuyds of prial removed and disposed of.				
main	se describe your stormwater facility maintenance program for cleaning and tenance of all stormwater facilities operated by the municipality. Attach additional is as necessary.				
 Mendham Township has implemented a stormwater facility maintenance program to ensure that all stormwater facilities operated by the Township function properly. Mendham Township operates the following: catch basins storm drains infiltration basins buffer strips swales detention/retention basins These stormwater facilities will be inspected annually to insure that they are functioning properly. In high risk areas, preventative maintenance will be performed on all stormwater facilities to ensure that they do not begin to fail. 					
L					

SPPP Form 14 – Outfall Pipe Stream Scouring Remediation

Municipality: Mendham Township County: Morris

NJPDES # : NJG 0150819

PI ID #: 207157

Municipality Information Team Member/Title: David H. Read, Jr., Superintendent of Public Works Denis Keenan, Township Engineer Effective Date of Permit Authorization (EDPA): 4/1/04

Date of Completion: 3/05

Date of most recent update: 6/6/18

Describe your stormwater outfall pipe scouring detection, remediation and maintenance program to detect and control active, localized stream and stream bank scouring. Attach additional pages as necessary. (NOTE: Attach a prioritized list of sites observed to have outfall pipe stream and stream bank scouring, date of anticipated repair, method of repair and date of completion.)

When we are doing the illicit connection part of this program, we will be checking all of our outfall pipes for signs of scouring. All sites will be placed on a prioritized list and repairs will be made in accordance with the Standards for Soil Erosion and Sediment Control in New Jersey. In addition, repairs that do not need NJDEP permits for those repairs may be done first. We will follow each repair up with an annual inspection of the site to ensure that scouring has not resumed. A list of all sites with outfall pipe stream scouring, the date we plan on repairing the scouring, and the method of repair we will use will be provided. When repairs are completed we will note the date of that repair on the form.

	SPPP Form 15 – De-icing Material Storage						
	Municipality: Mendham Township County: Morris						
ality tion	NJPDES # : NJG 0150819 PI ID #: 207157						
Municipality Information	Team Member/Title: David H. Read, Jr., Superintendent of Public Works						
Mu Infi	Effective Date of Permit Authorization (EDPA): 4/1/04						
	Date of Completion: 3/05 Date of most recent update: 6/6/18						
	De-icing Material and Sand Storage						
your meet seas inclue store	Describe how you currently store your municipality's de-icing materials, and describe your inspection schedule for the storage area. If your current storage practices do not meet the de-icing material storage SBR describe your construction schedule and your seasonal tarping interim measures. If you plan on sharing a storage structure, please include its location, as well as a complete list of all concerned public entities. If you store sand outdoors, describe how it meets the minimum standard. <i>Mendham Township currently stores its de-icing material in a permanent structure located at its maintenance yard on Mount Pleasant Road.</i>						
com	age and Loading areas will be inspected on a regular basis as well as at the pletion of loading and unloading activities. Any spilled material will be returned to torage structure and maintenance will be performed as required.						
reuse addit	Spilled de-icing material shall be removed using dry cleaning methods and either reused or properly discarded. Storage and Loading areas will be swept as needed in addition to after loading/unloading activities. Tracking of materials from storage & loading areas will be minimized.						

SPPP Form 16 – Standard Operating Procedures							
Municipality: Mendham Township County: Morris							
<u>}</u> c NJPDES # : NJG <u>015</u>	5081 <u>9</u> PI	0819 PI ID #: 207157					
lun	David H. Read, Jr., Super						
Date of Completion:	3/05 Date of m	ost recent update: 4/2/18					
BMP	Date SOP went into effect	Describe your inspection schedule					
Fueling Operations (including the required practices listed in Attachment D of the permit)	January 2007	Fueling operations are monitored closely on a daily basis.					
Vehicle Maintenance (including the required practices listed in Attachment D of the permit)	January 2007	Vehicle maintenance operations are monitored on a daily basis.					
Good Housekeeping Practices (including the required practices listed in Attachment D of the permit) Attach inventory list	January 2007	Good housing keeping practices are monitored on a daily basis.					

Equipment and Vehicle Washing	May 2009	The Township has installed a vehicle wash and water recovery system to capture all of the wash water. The captured water is then pumped and hauled to a proper disposal facility.

SPPP Form 17 – Employee Training		
Municipality Information	Municipality: Mendham Township	County: Morris
	NJPDES # : NJG <u>0150819</u>	PI ID #: <u>207157</u>
	Team Member/Title: Deborah Bonanno, Township Administrator	
	Effective Date of Permit Authorization (EDPA): 4/1/04	
	Date of Completion: 3/05 Da	te of most recent update: 4/2/19
Dates for the above training programs are held on an annual basis.		