



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): October 19, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Separate Storm Sewer System (MS4) Program
MS4 Name: Palmyra Borough MS4
MS4 Address: 325 S. Railroad Street, Palmyra, PA 17078
Latitude: 40.3287N **Longitude:** 76.5993W
County: Lebanon County
General Permit #: PAG-13
Specific Permit #: PAG133558
Main Surface Water: Swatara Creek /Susquehanna River
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E23WN007A

MS4 Representative(s): **Point of Contact**

Roger Powl, Borough Manager

Palmyra Borough

Phone: 717-838-6361

Email: rpowl@palmyraborough.org

Mike Knouse, Engineer

Palmyra Borough

Phone: 717-516-7523

Email: Mike.knouse@rettew.com

EPA Inspectors:

Pete Gold

Phone: (215) 814-5236

Email: Gold.Peter@epa.gov

Edward Simas

Phone: (215) 814-2120

Email: Simas.Edward@epa.gov

State/Local Inspectors:

No State/Local inspectors in attendance.

Gold, Peter
Digitally signed by Gold, Peter
Date: 2022.12.28 13:16:32 -05'00'

for

Report Preparer
Signature/Date

Edward Simas, Inspector
NPDES Section

Date

MARK
ZOLANDZ
Digitally signed by MARK ZOLANDZ
Date: 2022.12.28 13:21:34 -05'00'

12/28/2022

Supervisor
Signature/Date

Mark Zolandz, Acting Section Chief
NPDES Section

Date

Unique Project#: 3E23WN007A

Table of Contents

I. Introduction	3
A. Inspection Opening Conference	3
B. Weather and Precipitation Conditions.....	3
II. MS4 Activity	4
III. Observations	5
IV. Records Review	4
V. Closing Conference.....	7

List of Attachments

Attachment 1:	NPDES Permit PAG-13
Attachment 2:	2022 MS4 Annual Report
Attachment 3:	PCSM BMP Inspections 2022
Attachment 4:	PCSM BMP As-built Plans
Attachment 5:	Operation and Maintenance Program
Attachment 6:	Photo Log
Attachment 7:	MCM 3 MS4 Outfall Map
Attachment 8:	MCM 5 BMP Inventory

I. Introduction

On October 19, 2022, an inspection team comprised of staff from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") met with representatives of the Pennsylvania Department of Environmental Protection (PADEP) and the Palmyra Borough ("Borough") at the Borough maintenance facility. The purpose of the inspection was to review the Borough's compliance with their PADEP National Pollutant Discharge Elimination System ("NPDES") General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) Permit No. PAG133558 ("Permit").

Prior to the inspection, the EPA Inspection Team reviewed the Attachment 1 - MS4 General Permit and Attachment 2 - 2022 MS4 Annual Report. The EPA Inspection Team also requested and reviewed: Attachment 3 – PCSM BMP Inspections 2022; Attachment 4 – As-built Plans for PCSM BMP; Attachment 5 – Operation and Maintenance Program; Attachment 6 – Photo Log; Attachment 7 – MCM 3 MS4 Outfall Map; and Attachment 8 – MCM 5 BMP Inventory.

As part of the inspection, the EPA Inspection Team reviewed efforts regarding minimum control measures ("MCMs") for illicit discharge detection and elimination ("IDD&E"); post-construction stormwater management ("PCSM"); and pollution prevention and good housekeeping for facilities owned or operated by the Borough within the MS4 service area. The EPA Inspection Team inspected three PCSM best management practices ("BMPs") that were selected by the EPA Inspection Team prior to the inspection and one of the Borough's maintenance yards.

The photographs for this report were taken by Peter Gold. Unused photos are digitally stored and maintained in the inspection file and are available upon request.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Borough maintenance facility at approximately 2:00pm. The EPA Inspection Team identified themselves to the Borough representatives, displayed their credentials, and described the purpose of the compliance inspection. The EPA Inspection Team met with the Borough representatives and then inspected the maintenance facility and the three structural PCSM BMPs. The EPA Inspection Team's observations are listed later in this document and are grouped by type of observation.

B. Weather and Precipitation Conditions

During the inspection, weather was sunny. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below:

Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
PALMYRA 2.1 S, PA US	10/14/22	0.51
PALMYRA 2.1 S, PA US	10/15/22	0.00
PALMYRA 2.1 S, PA US	10/16/22	0.00
PALMYRA 2.1 S, PA US	10/17/22	0.00
PALMYRA 2.1 S, PA US	10/18/22	0.00
PALMYRA 2.1 S, PA US	10/19/22	0.00

II. MS4 Activity

Palmyra Borough is part of the Lebanon, Pennsylvania Metropolitan statistical area. The population was 7,807 at the 2020 census. According to the United States Census Bureau, the Borough has a total area of 1.9 square miles (4.9 km²), all of it land. Palmyra is in the Lebanon Valley between Annville and Hershey. Situated on the western edge of Lebanon County, the borough is 10 mi (16 km) west of Lebanon, and 17 mi (27 km) east of Harrisburg. The village of Campbelltown is only 2 mi (3.2 km) south of Palmyra and carries a Palmyra mailing address. Although no water source runs directly through the Borough, the Killinger Creek, Quittapahilla Creek, Spring Creek, and Swatara Creek are all located nearby. The Borough owns and operates a municipal separate storm sewer system (MS4) that consists of manmade and natural components of a stormwater management infrastructure to both limit and manage the volume of stormwater to mitigate flood events and to minimize degradation of the Borough's waterways through stormwater quality management. Existing regulated outfalls will be identified for annual inspection and illicit discharge tracking. The Borough is authorized to discharge stormwater runoff from the MS4 under the terms and conditions of the Permit (Attachment 1).

III. Observations

The EPA Inspection Team conducted inspections of the Borough's municipal maintenance facility located on a decommissioned sewage treatment plant. Additionally, there are three PCSM facilities that were targeted to be observed at the time of inspection. The Borough has a total of 22 BMPs listed in their MCM 5 inventory (Attachment 8). The observations made by the EPA Inspection Team are identified below.

Part C, 1.B.3 of the Permit - MCM 3: Illicit Discharge Detection and Elimination (IDD&E)

The General Permit requires “all of the identified regulated small MS4 outfalls shall be screened during dry weather at least twice within the 5-year period following approval of coverage under this General Permit” and that “...existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by March 15, 2023.”

Observation #1:

The 2022 MS4 Annual Report (Attachment 2) contains documentation of the Borough's inventory of outfalls and the Borough's efforts to conduct dry weather screening. As documented in Palmyra's 2022 MS4 Annual Report & Storm Sewershed Map, Palmyra Borough contains no official outfalls, only observation points. During the inspection, the

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Borough confirmed that no watercourses are reached through each of these points. It is unclear how many observation points are in the area. Palmyra's Storm Sewershed Map (Attachment 7) displays 13 total observation points, however the 2022 MS4 Annual Report lists only 5 total points. In a response from an EPA follow up email on 11/10/22, the Borough mentioned that the map is one of the items to be updated. The Borough stated that only five observation points are currently reported through the Annual Report.

Part C, 1.B.5 of the Permit - MCM 5: Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment

BMP 3 of MCM 5 of the General Permit requires municipalities to "Ensure adequate O&M of all post-construction stormwater management BMPs that have been installed at development or redevelopment projects that disturb greater than or equal to one acre..."

An inventory of PCSM BMPs shall be developed by new permittees by the end of the first year of General Permit coverage and shall be continually updated during the term of coverage under the General Permit as development projects are reviewed, approved, and constructed. Existing permittees shall update and maintain its current inventory during the term of coverage under the General Permit. The permittee must track the following information in its PCSM BMP inventory:

- ...
- The exact location of the PCSM BMP (e.g., latitude and longitude, with street address).
- Information (e.g., name, address, phone number(s)) for BMP owners and entities responsible
- The type of BMP and the year it was installed
- ...
- The actual inspection/maintenance activities conducted for each BMP.
- 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.

Observation #2:

The Borough provided the EPA Inspection Team with its PCSM BMP Inventory for 2022 (Attachment 8), which describes their efforts regarding PCSM facilities. Upon completion of the inspection, EPA requested Borough inspection reports for the observed BMPs: Mavis Tires, First National Bank, and Fireman's Park. Inspections of these BMP's were completed recently on 10/17/22 as required per the Permit (Attachment 3). The names, addresses, and owners are provided on the BMP inventory. The record of inspection and maintenance activities did not appear to be included in the inventory.

Observation #3:

As-built plans (Attachment 4) for three PCSM BMPs were requested and reviewed by the EPA Inspection Team for the inspection. All three of the BMPs were constructed at the locations listed in Attachment 9. The EPA Inspection Team inspected three BMPs: Mavis Tires, First National Bank, and Fireman's Park located within the Borough. The observations for each BMP are described in separate observations below. For photographs pertaining to the

PCSM BMPs, refer to photographs IMG0006 through IMG0026 of the Photo Log (Attachment 6).

Observation #4:

First National Bank

The EPA Inspection Team observed the First National Bank PCSM BMP, a detention basin located on E. Main Street (Photographs IMG0009 – IMG0013 in Attachment 6). The grass appeared to be eroded at the entrance to the outlet (Photograph IMG0013 in Attachment 6). The as-built plan (Attachment 4) details that “RIPRAP APRON #6” was to be constructed in the area of the eroded grass, however no riprap was observed at the time of the inspection. On 11/10/22, the Borough emailed a photo of the basin from the time of the BMP construction with the riprap at the location of the outlet (Photograph IMG2965 in Attachment 6). It was unclear when or why this riprap was removed.

Observation #5

Mavis Tires

The EPA Inspection Team observed the rain garden at Mavis Tires across the street from First National Bank (Photographs IMG0006 – IMG0008 and IMG0014 – IMG0017 in Attachment 6). The center of the rain garden appeared to contain overgrown vegetation. There are three outlets around the rain garden that are caged to prevent excess debris from entering (Photographs IMG0014 – IMG0017 in Attachment 6). The EPA Inspection Team then walked to the south section of Mavis Tires to view the existing detention basin and an additional rain garden (Photographs IMG0018 – IMG0022 in Attachment 6). The existing detention basin connects into the rain garden, and both BMPs aligned to the as-built plan. There was adequate riprap observed at the center of the rain garden (Photograph IMG0022 in Attachment 6).

Part C, 1.B.6 of the Permit - MCM 6: Pollution Prevention / Good Housekeeping

The permittee must develop and implement an O&M program that includes a training component and has the ultimate goal of preventing and reducing pollutant runoff from operations, facilities and activities under the control of the permittee (collectively, “operations”). The program must include employee training to prevent and reduce stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance.

...

b. BMP #2: Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the regulated small MS4, as identified under BMP #1. This program shall address stormwater collection or conveyance systems within the regulated MS4. . The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information.

- (1) New permittees shall develop and implement a written O&M program by the end of the first year of General Permit coverage and review and update the program each year thereafter.

Observation #6:

The Borough provided “Attachment 5 – Operation and Maintenance Operations” for equipment fueling, washing, and maintenance. This O&M program covers the Borough’s operations that could contribute to discharge of pollutants. Attachment 5 indicates that the Borough is in accordance with operation and maintenance requirements in the Permit.

Part C, 1.B.6.c of the Permit

BMP #3: Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance and repair activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee’s overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

...

(3) Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).

Observation #6:

The Borough did not provide employee training records to EPA, and it is unclear if pollution prevention and good housekeeping training is complete for the reporting period of July 1, 2021 through June 30, 2022.

IV. Records Review

As part of this inspection, the EPA Inspection Team reviewed the documents identified in the List of Attachments at Page 2 of this report.

V. Closing Conference

At the conclusion of the field inspection, the EPA Inspection Team conducted a closing conference with Borough representatives and shared preliminary observations. The EPA Inspection Team reiterated to the Borough representatives that all preliminary observations discussed were not compliance determinations. Preliminary observations shared with the Borough are subject to further investigation by EPA, including additional review of records and documentation. As a result, additional observations may be contained in this inspection report that were not identified at the time of the closing conference. The inspection concluded at approximately 3:20 PM (EDT).