



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 17, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Separate Storm Sewer System (MS4)
MS4 Name: East Pennsboro Township MS4
MS4 Address: 98 South Enola Drive, Enola, PA 17025
Latitude: 40.28751°N **Longitude:** 76.9323°W
County/Parish: Cumberland County
General Permit #: PAG-13
Specific Permit #: PAG133680
Main Surface Water: Susquehanna River
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E23WN002A
MS4 Representative(s): **Point of Contact**
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Unique Project #: 3E23WN002A

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 5

V. Closing Conference..... 8

List of Attachments

- Attachment 1: NPDES MS4 Permit No. PAG133680
- Attachment 2: 2021 MS4 Annual Report
- Attachment 3: PCSM BMP As-built Plans
- Attachment 4: MCM 6 Good Housekeeping Plan
- Attachment 5: Photo Log
- Attachment 6: Stormwater Ordinance Adoption Update

I. Introduction

On October 17, 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 East Pennsboro Township ("Township") at the Township municipal yard. The purpose of the inspection was to review the Township's compliance with their Pennsylvania Department of Environmental Protection ("PADEP") National Pollutant Discharge Elimination System ("NPDES") General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) Permit No. PAG133680 ("Permit").

Prior to the inspection, the EPA Inspection Team reviewed Attachment 2 – 2021 MS4 Annual Report. The EPA Inspection Team also requested and reviewed; Attachment 3 – As-built Plans for PCSM BMPs; and Attachment 4 – MCM 6 Good Housekeeping Plan.

As part of the inspection, the EPA Inspection Team reviewed efforts regarding minimum control measures ("MCM") for illicit discharge detection and elimination ("IDDE"); post-construction stormwater management ("PCSM"); and pollution prevention and good housekeeping for facilities owned or operated by the Township within the Municipal Separate Storm Sewer System ("MS4") service area. The EPA Inspection Team inspected three PCSM facilities that were selected by the EPA Inspection Team prior to the inspection and the Township's municipal yard.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Township's municipal yard at approximately 1:30 PM. The EPA Inspection Team identified themselves to the Township representatives, displayed their credentials and described the purpose of the compliance inspection. The following inspectors and representatives were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Angela Weisel	EPA Region III	(215) 814-2124	Weisel.angela@epa.gov
Peter Gold	EPA Region III	(215) 814-5236	Gold.peter@epa.gov
Facility Representatives			
Ed Myers	East Pennsboro Township	(717)732-0711 x1248	emyers@eastpennsboro.net
Alex Arcuri	East Pennsboro Township	(717)732-0711 x1221	aarcuri@eastpennsboro.net

The EPA Inspection Team and Township representatives then inspected the maintenance facility and the three PCSM facilities. 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 Table 2 below:

Table 2: Precipitation Data

Station Name	Date	Precipitation Amount (inches)¹
HARRISBURG 1 NE, PA US	10/12/22	0.00
HARRISBURG 1 NE, PA US	10/13/22	0.29
HARRISBURG 1 NE, PA US	10/14/22	0.52
HARRISBURG 1 NE, PA US	10/15/22	0.01
HARRISBURG 1 NE, PA US	10/16/22	0.00
HARRISBURG 1 NE, PA US	10/17/22	0.00

II. MS4 Activity

East Pennsboro Township is located in the northeast corner of Cumberland County, bordered to the east by the Susquehanna River, which separates it from Dauphin County. The Township owns and operates an MS4 that consists of manmade and natural components of a stormwater management infrastructure (I.e., a conveyance or system of conveyances, including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains), to both reduce and manage the volume of stormwater to mitigate flood events and to minimize degradation of the City's waterways through stormwater quality management. The Township's natural northern boundary is the crest of Blue Mountain, which separates it from Perry County. Conodoguinet Creek makes several large bends across the southern part of the township before entering the Susquehanna between West Fairview and Wormleysburg.

According to the United States Census Bureau, the township has a total area of 10.7 square miles (27.7 km²), of which 10.4 square miles (26.9 km²) is land and 0.3 square miles (0.8 km²), or 2.90%, is water. The Township is authorized to discharge stormwater runoff from the MS4 under the terms of its Permit.

III. Observations

The EPA Inspection Team conducted inspections of the Township's municipal yard including the Public Works building, and three PCSM Best Management Practices ("BMPs"). The observations made by the EPA Inspection Team are identified below. Photographs taken during the field visits were taken by Peter Gold and are included in Attachment 7 – Photo Log.

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

MCM 3: Illicit Discharge Detection and Elimination (IDD&E)

Permit Part C.I.B.3.e (MCM 3 BMP #5) of the General Permit requires municipalities to “Enact 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.”

(1) Municipal permittees shall submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance (3800-PM-BCW0100j) as an attachment to an Annual MS4 Status Report by September 30, 2022 (existing permittees) or the fourth (4th) Annual MS4 Status Report following approval of coverage under this General Permit (new permittees).

Observation 1: At the time of the inspection, the Township did not submit a copy of an ordinance that is consistent with DEP’s 2022 Model Stormwater Management Ordinance by September 30, 2022. However, the Township provided an anticipated schedule for the adoption of the Ordinance following the inspection. See Attachment 6.

MCM 5: Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment

Permit Part C.I.B.5.c (MCM 5, BMP #3) 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:

- *All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003.*
- *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.*
- *Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources.*
- *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: As-built plans (Attachment 3) for three PCSM BMPs were requested and reviewed by the EPA Inspection Team prior to the inspection. The EPA Inspection Team inspected three of these PCSM BMPs (East Treemont Basin, Dakemich Court Infiltration Trench, and Camp Hill Commons Basin) located within the Township. It appeared during the field inspections that all BMPs inspected were located, configured, and contained the inlets and outlets as depicted in the plans.

The conditions at the East Treemont Basin PCSM BMP are documented by photographs PA170033 through PA170039 in Attachment 5 – Photo Log.

The conditions at the time of the inspection for the Dakemich Court Infiltration Trench PCSM BMP are documented in photograph PA170040 and PA170041 in Attachment 5 – Photo Log. It appears that the most recently constructed apartment building's gutter system does not go into the infiltration basin. This is captured in photograph PA170041 in Attachment 5 – Photo Log.

The conditions at the Camp Hill Commons Basin PCSM BMP can be seen in photographs PA170042 through PA170044 in Attachment 5 – Photo Log.

MCM 6: Pollution Prevention / Good Housekeeping

Permit Part C.I.B. 6 (MCM 6) of the General Permit states, "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"

Permit Part C.I.B.6.b (MCM 6, BMP #2) states, "The written O&M program shall stress pollution prevention and good housekeeping measures, contain site-specific information, and include the following: ... 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..."

Observation 3: During the inspection of the municipal yard, oil staining was observed on the pavement near the inlet north of the Public Works building, where it is potentially exposed to stormwater runoff. Conditions at the time of the inspection can be observed in photographs PA170008 and PA170009 in Attachment 5 – Photo Log.

Observation 4: The EPA Inspection Team observed what appears to be ground staining on the pavement in the lot west of the Public Works building and the pavement outside of the Public Works building's west entrance. Conditions at the time of the inspection can be observed in photographs PA170019 and PA170027 in Attachment 5 – Photo Log. Ground staining was also observed underneath an East Pennsboro Public Works truck parked outside of the building. This can be observed in photograph PA170028 in Attachment 5 – Photo Log.

Observation 5: The EPA Inspection Team observed sediment migration throughout the municipal yard, specifically near the inlet outside of the salt shed, where it is potentially

exposed to stormwater runoff. Conditions at the time of the inspection can be observed in photographs PA170011 through PA170015 in Attachment 5 – Photo Log.

Observation 6: During the inspection of the municipal yard, the EPA Inspection Team observed what appeared to be tar staining beneath the asphalt tar machine stored outside of the Public Works building. Conditions at the time of the inspection can be observed in photographs PA170017 and PA170018 in Attachment 5 – Photo Log.

Observation 7: The EPA Inspection Team observed two large dumpsters in the lot west of the Public Works building. Township representatives stated that one dumpster is used for tires and miscellaneous trash, and one dumpster is used for tires only. There were no lids observed on the dumpsters as shown in photographs PA170021 through PA170023 in Attachment 5 – Photo Log.

Observation 8: During the inspection of the Public Works building, five floor drains were observed. Township representatives stated that the floor drains lead to a 275-gallon waste tank. The drains collect fluids from the mechanics bay, washbay, and the large section of the garage used for vehicle storage. Township representatives also stated that the waste tank is underneath the floor in the tire storage room within the Public Works building (Photograph PA170032 in Attachment 5 – Photo Log). The Township uses a third-party contractor, SafetyKleen, to pump the waste tank and haul the waste as needed. Floor drains can be observed in photographs PA170029 through PA170031 in Attachment 5 – Photo Log.

Permit Part C.I.B.6.c (MCM 6, BMP #3) of the General Permit requires municipalities to “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 9: In the 2021 Annual Report, the Township provides information that indicates that the Township conducted pollution prevention and good housekeeping training for its staff on May 5 and 6, 2021 for the reporting period July 1, 2020 through June 30, 2021.

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. Following the inspection, the EPA Inspection Team reviewed the latest inspections of the BMPs visited as well.

V. Closing Conference

At the conclusion of the field inspection, the EPA Inspection Team conducted a closing conference with Township representatives and shared preliminary observations. The EPA Inspection Team reiterated to the Township representatives that all preliminary observations discussed were not compliance determinations. Preliminary observations shared with the Township 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 3:30 PM (EDT).