



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: Borough of Terre Hill MS4
Facility Address: 300 Broad Street PO Box 250, Terre Hill, PA 17581
Mailing Address: 300 Broad Street PO Box 250, Terre Hill, PA 17581

Report Prepared on: 7/28/2021
Date

By: *Taylor Fontaine*
Environmental Scientist (PG Environmental)
Signature

Report Final as of: _____
Date

By: _____, EPA
Signature

General Information

Type of Inspection:	MS4 Compliance Inspection
Owner:	Borough of Terre Hill
Operators:	Borough of Terre Hill
Permittee:	Borough of Terre Hill
NPDES Permit No:	PAI133523
NPDES Permit Effective Date:	May 1, 2014
NPDES Permit Expiration Date:	April 30, 2019
Receiving Water(s) and/or MS4:	Unnamed Tributary to Black Creek, Unnamed Tributary to Conestoga River
Latitude and Longitude:	40.1584, -76.0541

On-Site Facility Site Visits Overview

On May 26, 2021, EPA contractors, PG Environmental, (hereinafter, EPA Inspection Team) conducted site visit inspections of multiple locations that discharge to the Borough of Terre Hill, Pennsylvania (hereinafter, Borough or Permittee) Municipal Separate Storm Sewer System (MS4) program. These in-person site visits complement an EPA offsite compliance review of the Borough's MS4 program conducted May 10–13, 2021. Both the offsite review and site visit inspections were conducted to assess the Borough's compliance with the requirements of Pennsylvania's *National Pollutant Discharge Elimination System (NPDES) Individual Permit (IP) for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. PAI33523; hereinafter, the Permit). A copy of the Permit is provided in Appendix A.

Approximate Entry Time: 9:05 AM (EDT) **Approximate Exit Time:** 11:15 AM (EDT)

Unique Project Identifier (UPI): 3E21WN074A

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Appendix A: Pennsylvania’s NPDES Individual Permit for Stormwater Discharges from Small MS4s

Appendix B: Exhibit Log

- Exhibit 1 – Site inspection sign-in sheet
- Exhibit 2 – Pollution Prevention and Good Housekeeping for Municipal Operations and Maintenance Guide
- Exhibit 3 – Borough MS4 Maps

INTRODUCTION

Weather and Precipitation:

During the inspection, there were sunny skies and temperatures averaging approximately 76 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and seven days prior are provided in the table below.

Table 1. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches) ¹
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 19, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 20, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 21, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 22, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 23, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 24, 2021	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 25, 2021	0.26
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	May 26, 2021	0.0

INSPECTION PROCESS

Inspection Opening and Closing Conferences

The EPA Inspection Team arrived at the Borough of Terre Hill Office at 9:05 a.m. (EDT) for the inspection. Jake Albright of PG Environmental displayed his Clean Water Act inspector credentials to Borough representatives at the outset of the inspection and explained that the purpose of the inspection was to make field observations to complement an offsite compliance review of the Borough's MS4 program conducted May 10–13, 2021. A copy of the inspection sign-in sheet is included as Appendix B, Exhibit 1.

The EPA Inspection conducted a brief closing conference with the Public Works Superintendent at Terre Hill Community Memorial Park to share preliminary observations prior to leaving the Borough at approximately 11:15 a.m. (EDT).

This report includes observations and photographs from inspections conducted at one Borough owned and operated facility, four Borough owned and operated post-construction best management practices (BMPs), three Borough MS4 outfalls, and one privately owned and operated post-construction BMP that the Borough inspects to verify proper long-term operation and maintenance.

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

SITE VISIT OBSERVATIONS

Site No. 1: Borough of Terre Hill Municipal Garage

Address/Location: 307 Willow Street, Terre Hill, PA 17581

Relevant Minimum Control Measure (MCM): Pollution Prevention / Good Housekeeping

Entry Time: 9:43 AM (EST)

Exit Time: 9:52 AM (EST)

Table 1.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Borough of Terre Hill Municipal Garage (hereinafter, Municipal Garage) comprises a primary garage for truck and equipment storage, several other smaller garages/sheds for tools and equipment storage, a parking lot, two-250 gallon aboveground fuel tanks (one diesel, one regular unleaded gasoline), a covered dumpster, and stored aggregate materials (i.e., stone and dirt). The southern portion of the Municipal Garage property is owned and operated by the Borough. This includes the primary storage garage and fuel tanks. The northern portion of the property is located outside of the Borough's urbanized area (UA), on property owned by East Earl Township (operated by the Borough). The northern part of the property includes the aggregates storage area and secondary storage garages/sheds. Runoff from the northern portion of the site runs off into East Earl Township. Borough representatives stated that there is no salt storage onsite and occasional vehicle washing is conducted on the western portion of the property where the wash water runs off into a grass field and infiltrates. Stormwater on the southern portion of the property is collected in catch basins along Willow Street and conveyed to Outfall #12.

Appendix A.MCM #6.BMP #2 requires the permittee to, "Develop, implement and maintain a written operation and maintenance (O&M) program for all municipal operations and facilities that could contribute to the discharge of pollutants from the regulated small MS4s, as identified under BMP #1. This program (or programs) shall address municipally owned stormwater collection or conveyance systems, but could include other areas (as identified under BMP #1). The O&M program(s) should stress pollution prevention and good housekeeping measures, contain site specific information, and address the following areas:

- Management practices, policies, procedures, etc. shall be developed and implemented to reduce or prevent the discharge of pollutants to your regulated small MS4s. You should consider eliminating maintenance-area discharges from floor drains and other drains if they have the potential to discharge to storm sewers.
- Maintenance activities, maintenance schedules, and inspection procedures to reduce the potential for pollutants to reach your regulated small MS4s. You also should review your procedures for maintaining your stormwater BMPs.
- 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, and salt / sand (anti-skid) storage locations and snow disposal areas.

- d. Procedures for the proper disposal of waste removed from your regulated small MS4s and your municipal operations, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, and other debris.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough’s pollution prevention and good housekeeping at the Municipal Garage.

- 1) The Borough had developed a Pollution Prevention and Good Housekeeping for Municipal Operations and Maintenance guide (refer to Appendix B, Exhibit 2). However, this guide does not discuss inspection procedures or frequency for municipal facilities, including for the Municipal Garage.
- 2) The EPA Inspection Team observed small petroleum stains on the pavement adjacent to the aboveground fuel storage tank building (refer to Photograph 1). Absorbent materials for spill cleanup were observed in the building.
- 3) The EPA Inspection Team observed two 250-gallon aboveground fuel storage tanks (one diesel, one regular unleaded). The tanks did not appear to be double-walled but were located under cover and within secondary containment (refer to Photographs 1 and 2).
- 4) The EPA Inspection Team observed a covered waste dumpster in the middle of the Municipal Garage property (refer to Photograph 3). The EPA Observation Team did not observe any trash or refuse near the dumpster or onsite.
- 5) The EPA Inspection Team observed inside the primary vehicle and tool storage garage (refer to Photograph 4). The garage did not contain any floor drains.
- 6) The EPA Inspection Team observed several aggregate storage areas in the northern portion of the Municipal Garage property. These aggregate piles appeared to mostly comprise dirt and crushed stone. The EPA Inspection Team observed the migration of materials from these aggregate containment areas (refer to Photographs 5, 6, and 7).
- 7) The EPA Inspection Team observed metal scrap materials, stored uncovered along the northern portion of the Municipal Garage property (refer to Photograph 8).
- 8) The EPA Inspection Team observed an infiltration swale located on private land to the east of the entire Municipal Garage property (refer to Photograph 9). This swale collects stormwater from the eastern portion of the property.

Site No. 2: Borough MS4 Outfall #12

Address/Location: 40.1634, -76.0498, Between Donna Drive and Water Street, along Willow Street

Relevant MCM: Illicit Discharge Detection and Elimination (IDDE)

Entry Time: 9:53 AM (EST)

Exit Time: 10:00 AM (EST)

Table 2.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Outfall #12 is located directly across the street (Willow Street) from the Municipal Garage, between Water Street and Donna Drive. Underneath Willow Street, there is a drainageway that is flowing via a box culvert that flows to unnamed tributary to Black Creek. Within the box culvert, there are four pipes that come from the Willow Street bridge connected to stormwater drains along the street, eventually flowing through the outfall and into an unnamed tributary to Black Creek.

Maps of the Borough’s MS4 system are included in Appendix B, Exhibit 3.

Appendix A.MCM #3.BMP #2 requires the Borough to, “Develop and maintain a map of your regulated small MS4. The map must also show the location of all outfalls and the locations and names of all surface waters of the Commonwealth (e.g., creek, stream, pond, lake, basin, swale, channel) that receive discharges from those outfalls.”

Site Visit Observations: The EPA Inspection Team made the following observations related to “Outfall #12.”

- 1) The EPA Inspection Team observed two catch basins on the north and south sides of Willow Street that convey stormwater to the outfall location (refer to Photograph 10).
- 2) The EPA Inspection Team observed a visible sheen in the unnamed stream upstream of the outfall (refer to Photographs 11 and 12). The sheen did not appear to be coming from any of the outfalls.
- 3) The EPA Inspection Team observed cinder blocks and other debris in the channel, originating from a retaining wall from the adjacent private lot that had collapsed (refer to Photograph 13).
- 4) The EPA Inspection Team observed four separate pipes leading into the culvert structure where Borough representatives stated Outfall #12 was located (refer to Photograph 14) as well as one corrugated metal pipe outfall, just upstream of the culvert. The Borough provided outfall maps that show five separate outfalls in this location; however, none are identified as Outfall #12 (refer to Appendix B, Exhibit 3). The outfalls shown on the map at this location are 009, 015, 016, 017, and 018. It is unclear why Borough representatives referred to this location as Outfall #12.

Site No. 3: Randall Drive Detention Basin

Address/Location: 417 Randall Drive, Terre Hill, PA 17581

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:10 AM (EST)

Exit Time: 10:23 AM (EST)

Table 3.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Randall Drive Detention Basin was constructed to hold stormwater runoff from nearby Randall Drive prior to slowly discharging across a privately-owned field. The privately owned and operated basin was designed with a stormwater storage area, trash rack, concrete riser outlet structure, outlet pipe, and vegetated buffer along the perimeter. According to Borough representatives, the basin is visually inspected by Borough staff annually and maintenance and inspection requirements for the basin are delegated within the property deed. However, these inspections by the Borough were not currently being documented at the time of the site visit inspection.

Appendix A.MCM #5.BMP #3, requires the Borough to, “Ensure that controls are installed that shall prevent or minimize water quality impacts.

Measurable Goal: All qualifying development or redevelopment projects shall be inspected during the construction phase to ensure proper installation of the approved structural [post construction stormwater management] PCSM BMPs. A tracking system (e.g., database, spreadsheet, or written list) shall be implemented to track the inspections conducted and to track the results of the inspections (e.g., BMPs were, or were not, installed properly). Permittees not relying on DEP’s statewide QLP to satisfy requirements under this BMP shall summarize construction inspections and results in periodic reports. See BMP #6 for requirements related to post-construction inspection and tracking of PCSM BMPs to ensure that the operation and maintenance plan is being implemented.”

Site Visit Observations: The EPA Inspection Team made the following observations related to a privately-owned detention basin on Randall Drive.

- 1) Borough representatives stated that they inspect the BMP approximately annually and may take pictures, but they do not generate a formal inspection report.
- 2) The EPA Inspection Team observed the detention basin perimeter had recently been mowed. From what was visible, the structures within the basin appeared to be in good condition and no trash was observed (refer to Photograph 15).
- 3) The EPA Inspection Team observed the primary catch basin on Randall Drive that conveys stormwater to the detention basin (refer to Photograph 16).
- 4) Stormwater is discharged from the stormwater basin, through the concrete riser outlet structure, through a low flow orifice, and across the privately-owned field and towards a grassy area west of the basin (refer to Photograph 17).
- 5) The EPA Inspection Team observed vegetation growing in and around the outlet structure (refer to Photograph 18).

Site No. 4: Borough MS4 Outfall # 7

Address/Location: Center Avenue/Randall Drive, Terre Hill, PA 17581

Relevant MCMs: IDDE

Entry Time: 10:24 AM (EST)

Exit Time: 10:29 AM (EST)

Table 4.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Outfall #7 is located on Center Avenue, near the intersection of Randall Drive. The outfall collects stormwater from Center Avenue and conveys the stormwater to catch basins on the north and south sides of the street, eventually flowing through the outfall and into an unnamed tributary to Black Creek.

Maps of the Borough’s MS4 system are included in [Appendix B, Exhibit 3](#).

Appendix A.MCM #3.BMP #1 states that the Borough, “shall develop and implement a written program for the detection, elimination, and prevention of illicit discharges into your regulated MS4s. Your program shall include dry weather field screening of outfalls for non-stormwater flows and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources. The program shall include the following:

- a. Procedures for identifying priority areas. These are areas with a higher likelihood of illicit discharges, illicit connections, or illegal dumping. Priority areas may include areas with older infrastructure, a concentration of high-risk activities, or past history of water pollution problems.
- b. Procedures for screening outfalls in priority areas during varying seasonal and meteorological conditions.
- c. Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- d. Procedures for eliminating an illicit discharge.
- e. 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.
- f. Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants).
- g. Procedures for program documentation, evaluation and assessment.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough’s Outfall #7.

- 1) The EPA Inspection Team observed the outlet structure for Outfall #7 and observable dry weather flow at the time of the inspection (refer to [Photograph 19](#)). Borough representatives stated that the culvert where the outfall discharges is in a spring fed stream, and that moisture and flow during dry weather is a regular occurrence. Borough representatives did not formally document the dry weather flow during the EPA inspection.

- 2) The EPA Inspection Team observed two catch basins on the north and south sides of Center Avenue that convey stormwater to Outfall #7, located in a culvert under Center Avenue (refer to Photograph 20).
- 3) The EPA Inspection Team observed a drainage channel from a private stormwater basin located on the southern side of Center Avenue that discharges into the same culvert as Outfall #7 (refer to Photographs 21 and 22).

Site No. 5: Borough MS4 Outfall #4

Address/Location: Fairview Street, Terre Hill, PA 17581

Relevant MCM: IDDE

Entry Time: 10:35 AM (EST)

Exit Time: 10:37 AM (EST)

Table 5.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Outfall #4 is located on Fairview Street. The outfall receives stormwater runoff from several sources: storm drains along the north and south sides of Fairview Street and discharges it into an unnamed tributary to Black Creek. Additionally, the outfall receives flow through concrete channel that flows into the culvert that eventually flows to the outfall.

Maps of the Borough's MS4 system are included in [Appendix B, Exhibit 3](#).

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough's Outfall #4.

- 1) The EPA Inspection Team observed the outlet structure for Outfall #4 (refer to [Photograph 23](#)). The concrete pipe for Outfall #4 appeared to be 36 inches in diameter. However, an outfall map kept at the Borough office identified the outlet structure for Outfall #4 to be a 48-inch pipe (refer to [Photograph 24](#)). Borough representatives agreed there was an error on the map. Maps provided to the EPA Inspection Team by the Borough did not indicate outfall pipe diameters.
- 2) The EPA Inspection Team observed the catch basin and conveyance culvert on the north side of Fairview Street that channels water towards Outfall #4 (refer to [Photographs 25 and 26](#)). The structure was free of debris and appeared to be in good condition.

Site No. 6: Terre Hill Community Memorial Park Rain Garden #1

Address/Location: 210 Lancaster Ave, Terre Hill, PA 17581

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:44 AM (EST)

Exit Time: 10:49 AM (EST)

Table 6.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Terre Hill Community Memorial Park Rain Garden #1 (hereinafter, Rain Garden #1) was constructed in 2020 to capture and filter stormwater from the adjacent parking lot. The construction was funded by Lancaster County Conservancy.

Appendix A.MCM #5.BMP #6 requires the Borough to, “Ensure adequate Operation and Maintenance (O&M) of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).”

Measurable Goal - 1: Within the first year of coverage under this permit, new permittees shall develop and implement a written inspection program to ensure that stormwater BMPs are properly operated and maintained. The program shall include sanctions and penalties for non-compliance. All permittees shall review and update the inspection program annually and shall continue to implement this BMP.

Measurable Goal - 2: An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under the permit as development projects are reviewed, approved, and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to your regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory shall 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.
- The exact location of the PCSM BMP (e.g., street address);
- Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- 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 for each BMP;
- An assessment by the permittee if proper occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough’s post construction stormwater management at Rain Garden #1.

- 1) The EPA Inspection Team observed the primary areas that convey stormwater runoff to Rain Garden #1 (refer to Photograph 27); the adjacent parking lot to the north and east, and the field to the west. Though Rain Garden #1 was installed recently, in 2020, the rock swale was saturated with leaves and debris, potentially limiting the function of the BMP (refer to Photographs 28 and 29).

Site No. 7: Terre Hill Community Memorial Park Rain Garden #2

Address/Location: 210 Lancaster Ave, Terre Hill, PA 17581

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:51 AM (EST)

Exit Time: 10:54 AM (EST)

Table 7.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Terre Hill Community Memorial Park Rain Garden #2 (hereinafter, Rain Garden #2) was constructed to capture and filter stormwater from the field to the east field and rooftop runoff from the adjacent building. The approximate installation date of Rain Garden #2 was not confirmed at the time of the inspection.

Appendix A.MCM #5.BMP #6 requires the Borough to, “Ensure adequate Operation and Maintenance (O&M) of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).

Measurable Goal - 1: Within the first year of coverage under this permit, new permittees shall develop and implement a written inspection program to ensure that stormwater BMPs are properly operated and maintained. The program shall include sanctions and penalties for non-compliance. All permittees shall review and update the inspection program annually and shall continue to implement this BMP.

Measurable Goal - 2: An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under the permit as development projects are reviewed, approved, and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to your regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory shall include:

- a. All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003.
- b. The exact location of the PCSM BMP (e.g., street address);
- c. Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- d. The type of BMP and the year it was installed;
- e. Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources;
- f. The actual inspection/maintenance activities for each BMP;
- g. An assessment by the permittee if proper occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough's post construction stormwater management at Rain Garden #2.

- 1) The EPA Inspection Team observed that Rain Garden #2 was in need of maintenance at the time of the inspection. Specifically, the EPA Inspection Team observed an abundance of weeds within the garden. Borough representatives stated that the garden was last trimmed/cut in 2020, though some of the vegetation was permanently damaged or inadvertently removed from the maintenance (refer to Photographs 30 and 31). Borough representatives stated that the local soil conservation district has provided some training on rain gardens to Borough staff in the past; however, it is unclear when the training occurred, who attended, and what the focus was.

Site No. 8: Terre Hill Community Memorial Park Rain Garden #3

Address/Location: 210 Lancaster Ave, Terre Hill, PA 17581

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:58 AM (EST)

Exit Time: 10:59 AM (EST)

Table 8.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Terre Hill Community Memorial Park Rain Garden #3 (hereinafter, Rain Garden #3) was constructed to capture and filter stormwater from an adjacent parking lot and tennis court. The approximate installation date of Rain Garden #3 was not confirmed at the time of the inspection, though Borough representatives stated that it was last cleaned out in April 2021.

Appendix A.MCM #5.BMP #6 requires the Borough to, “Ensure adequate Operation and Maintenance (O&M) of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee).”

Measurable Goal - 1: Within the first year of coverage under this permit, new permittees shall develop and implement a written inspection program to ensure that stormwater BMPs are properly operated and maintained. The program shall include sanctions and penalties for non-compliance. All permittees shall review and update the inspection program annually and shall continue to implement this BMP.

Measurable Goal - 2: An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under the permit as development projects are reviewed, approved, and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to your regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory shall 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.
- The exact location of the PCSM BMP (e.g., street address);
- Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- 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 for each BMP;
- An assessment by the permittee if proper occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough's post construction stormwater management at Rain Garden #3.

- 1) Overall, the rain garden appeared to be in good condition at the time of the inspection.
- 2) The EPA Inspection Team observed an inlet within Rain Garden #3 that collects stormwater (refer to Photograph 32). Overflow from Rain Garden #3 is conveyed to Outfall 025, south of the park (refer to Photograph 33 and Appendix B, Exhibit 3).
- 3) The EPA Inspection Team observed the adjacent tennis court and parking lot from which stormwater runoff drains to the rain garden (refer to Photographs 34 and 35).

Site No. 9: Terre Hill Community Memorial Park Underground Storage Tank

Address/Location: 210 Lancaster Ave, Terre Hill, PA 17581

Relevant MCM: Post Construction Stormwater Management

Entry Time: 11:02 AM (EST)

Exit Time: 11:04 AM (EST)

Table 9.1. Site Visit Participants

Name	Title/Affiliation
Bob Rissler	Public Works Superintendent
Kent Morey	Borough Consultant Engineer, SSM Group, Inc.
Jake Albright	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Terre Hill Community Memorial Park Underground Storage Tank is a 2,000-gallon tank that collects rainwater runoff from the roof of Pavilion #1 and the nearby field. Overflow from this tank and Rain Garden #3 is conveyed through an outlet pipe downgradient of Pavilion #1 (refer to [Photograph 39](#)). The EPA Inspection Team did not make observations related to post construction program implementation at this site.

Appendix A.MCM #5.BMP #6 requires the Borough to, “Ensure adequate Operation and Maintenance (O&M) of all post-construction stormwater management BMPs installed at all qualifying development or redevelopment projects (including those owned or operated by the permittee)...

Measurable Goal - 2: An inventory of PCSM BMPs shall be developed by permittees and shall be continually updated during the term of coverage under the permit as development projects are reviewed, approved, and constructed. This inventory shall include all PCSM BMPs installed since March 10, 2003 that discharge directly or indirectly to your regulated small MS4s. The inventory also should include PCSM BMPs discharging to the regulated small MS4 system that may cause or contribute to violation of water quality standard. The inventory shall include:

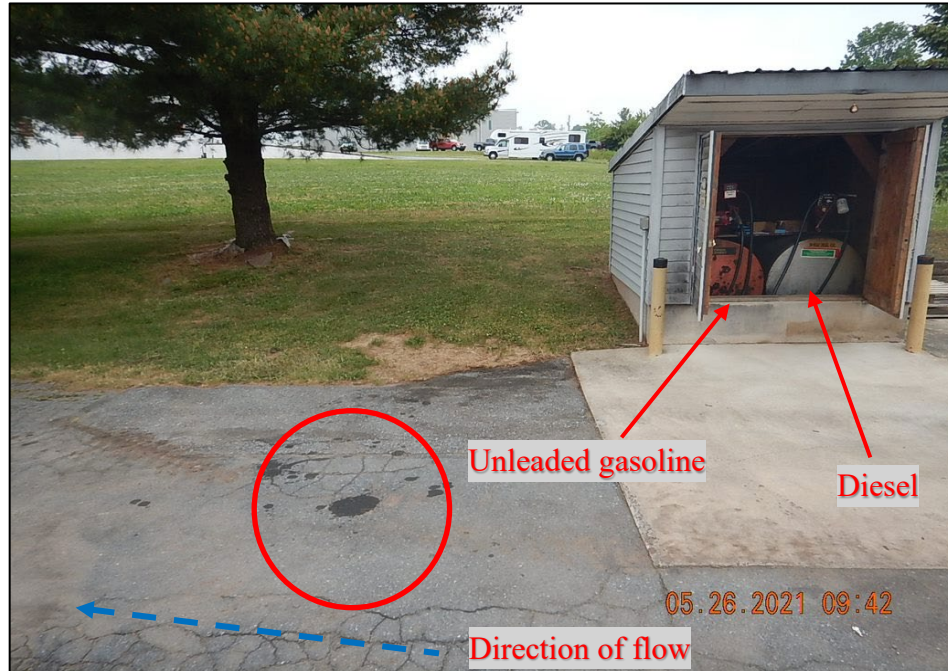
- a. All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003.
- b. The exact location of the PCSM BMP (e.g., street address);
- c. Information (e.g., name, address, phone number(s)) for BMP owner and entity responsible for BMP Operation and Maintenance (O&M), if different from BMP owner;
- d. The type of BMP and the year it was installed;
- e. Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources;
- f. The actual inspection/maintenance activities for each BMP;
- g. An assessment by the permittee if proper occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Borough’s post construction stormwater management at Terre Hill Community Memorial Park Underground Storage Tank.

- 1) The EPA Inspection Team observed a drainage inlet for a 2,000-gallon underground rainwater storage tank near Memorial Park Pavilion #1 (refer to [Photographs 36 and 37](#)). An overflow pipe

from the tank conveys excess volume to Outfall 025, south of the park (refer to Photograph 33 and Appendix B, Exhibit 3).

SITE VISIT PHOTOS



Photograph 1. Municipal Garage: (DSCN5083) View, facing west, of petroleum stains on the pavement adjacent to the aboveground fuel storage tank building. The tanks did not appear to be double-walled, but were located under cover and within secondary containment.



Photograph 2. Municipal Garage: (DSCN5084) Closer view of the aboveground unleaded fuel storage tank from Photograph 1. Note the bucket of absorbent material next to the tank.



Photograph 3. Municipal Garage: (DSCN5087) View, facing northeast, of several Borough vehicle and tool storage buildings and a covered dumpster.



Photograph 4. Municipal Garage: (DSCN5088) View inside one of the main enclosed garages that stores vehicles and tools. No floor drains were installed in this building.



Photograph 5. Municipal Garage: (DSCN5091) View, facing north, of more storage buildings and aggregate waste storage in the northern portion of the property.



Photograph 6. Municipal Garage: (DSCN5092) Closer view of Photograph 5, facing north, of aggregate waste storage piles in the northern portion of the property. Note the migration of materials from the containment area. Stormwater from this area flows north offsite to a grass field.



Photograph 7. Municipal Garage: (DSCN5093) Closer view of Photograph 6, facing east, of the wasted aggregates (primarily comprising dirt and crushed stone).



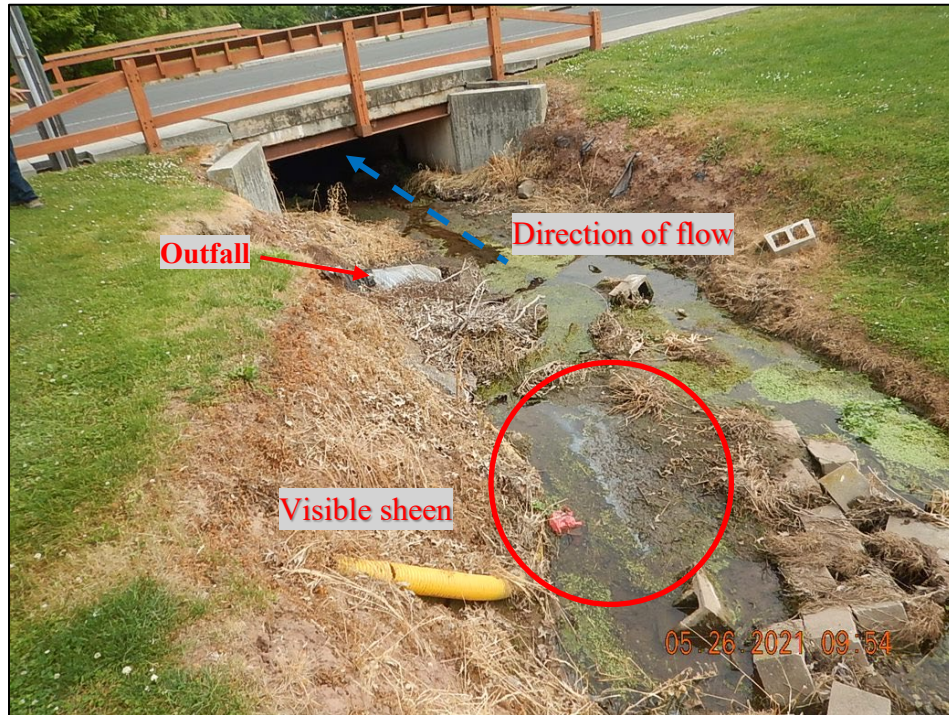
Photograph 8. Municipal Garage: (IMG_1784) View, facing north, of uncovered scrap metal materials in the northern portion of the property.



Photograph 9. Municipal Garage: (DSCN5095) View, facing south, of an infiltration swale located on private land to the east of the entire property. This swale collects stormwater from the eastern portion of the property.



Photograph 10. Outfall #12: (DSCN5100) View, facing east along Willow Street, of the catch basins that collect roadway stormwater and convey it to Outfall #12.



Photograph 11. Outfall #12: (DSCN5102) View, facing north, of the box culvert outlet structure for Outfall #12. There was debris and a visible sheen in the water upstream from the outfall. The adjacent embankments were located on private property.



Photograph 12. Outfall #12: (DSCN5103) Closer view of Photograph 11 of the visible petroleum sheen in the water upstream from the outfall.



Photograph 13. Outfall #12: (IMG_1797) View, facing east, of cinder blocks in the channel upstream of the outfall. These materials originated from the adjacent private property's retaining wall.



Photograph 14. Outfall #12: (IMG_1795) View inside outlet structure for Outfall #12. Note the four separate pipes leading into the structure that convey stormwater from both directions of Willow Street.



Photograph 15. Randall Drive Detention Basin: (DSCN5108) View, facing west, of the privately-owned and operated detention basin. This basin collects stormwater from the adjacent Randall Drive.



Photograph 16. Randall Drive Detention Basin: (IMG_1801) View of the primary catch basin along Randall Drive that conveys stormwater to the detention basin. Note the basin visible in the background.



Photograph 17. Randall Drive Detention Basin: (DSCN5110) View, facing east, of the outlet structure for the detention basin.



Photograph 18. Randall Drive Detention Basin: (DSCN5111) Closer view of Photograph 17, of the outlet structure for the detention basin. Note the excess vegetation in and around the structure.



Photograph 19. Outfall #7: (DSCN5115) View, facing southeast, of the culvert under Center Avenue where Outfall #7 is located. Dry weather flow was visible at the time of the inspection. Borough representatives stated that the location is part of a spring-fed stream and flow is normal.



Photograph 20. Outfall #7: (DSCN5118) View, facing southeast, of the two catch basins on Center Avenue that drain into Outfall #7.



Photograph 21. Outfall #7: (DSCN5120) View of the channel from the private basin located on the southern side of Center Avenue that channels flow into Outfall #7.



Photograph 22. Outfall #7: (DSCN5121) View, facing north, of the headwall at the end of the private basin channel that flows into Outfall #7.



Photograph 23. Outfall #4: (DSCN5122) View, facing south, of the top of the headwall for Outfall #4 along Fairview Street.



Photograph 24. Outfall #4: (DSCN5123) View, facing north, of the outlet pipe for Outfall #4. The structure appeared to be a 36-inch concrete pipe.



Photograph 25. Outfall #4: (IMG_1817) View, facing north, of culvert that flows into Outfall #4.



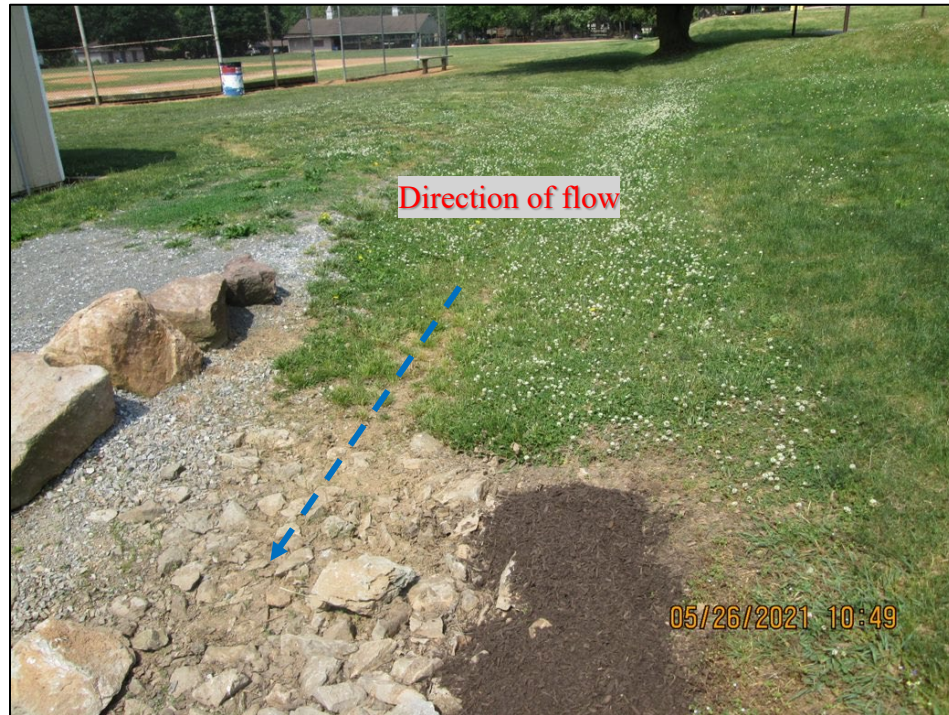
Photograph 26. Outfall #4: (IMG_1819) View, facing north, of culvert in Photograph 25 that flows to Outfall #4.



Photograph 27. Memorial Park Rain Garden #1: (DSCN5127) View, facing north, of Rain Garden #1 at the Terre Hill Community Memorial Park.



Photograph 28. Memorial Park Rain Garden #1: (DSCN5130) View, facing north, of Rain Garden #1 at the Terre Hill Community Memorial Park. This portion of the rain garden receives sheet flow from the adjacent parking lot. Note the accumulation of leaves and debris within the rain garden.



Photograph 29. Memorial Park Rain Garden #1: (IMG_1825) View, facing west, of the field that also conveys flow into Rain Garden #1. Note the accumulation of leaves and debris within the rain garden.



Photograph 30. Memorial Park Rain Garden #2: (DSCN5135) View of Rain Garden #2 at the Terre Hill Community Memorial Park which collects stormwater from the nearby grassy areas and adjacent building. Note the excessive weeds and vegetation within the rain garden.



Photograph 31. Memorial Park Rain Garden #2: (DSCN5137) An additional view of Rain Garden #2. Note the excessive weeds and vegetation within the rain garden.



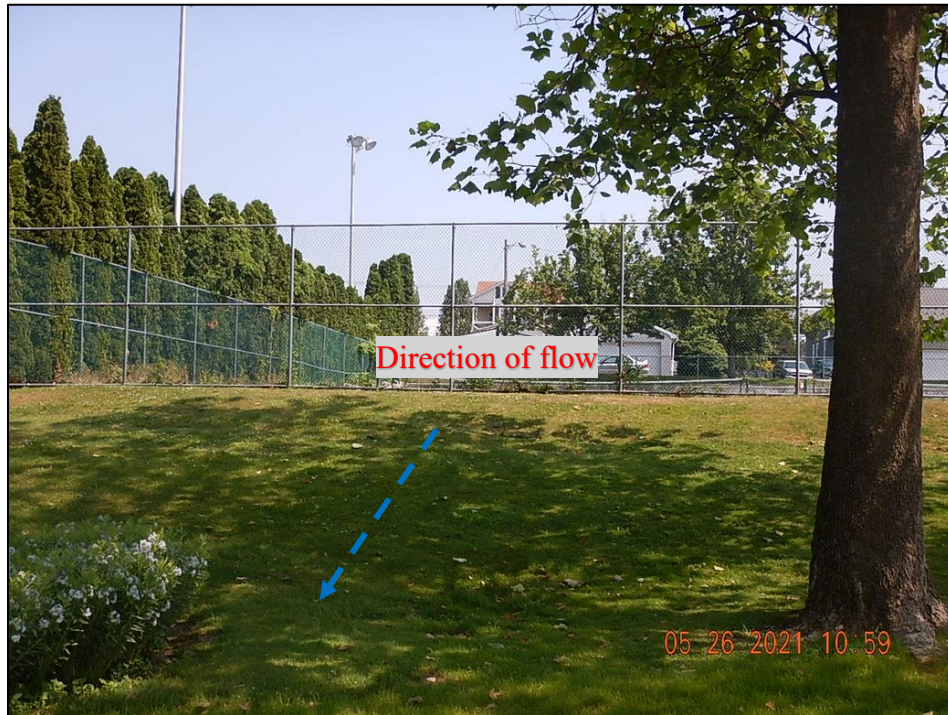
Photograph 32. Memorial Park Rain Garden #3: (DSCN5140) View, facing north, of Rain Garden #3 and attached inlet at the Terre Hill Community Memorial Park. This rain garden collects stormwater from an adjacent parking lot and tennis court.



Photograph 33. Memorial Park Rain Garden #3: (DSCN5148) View of the overflow outlet pipe from Rain Garden #3 and the stormwater tank. The channel leads to Outfall 025.



Photograph 34. Memorial Park Rain Garden #3: (DSCN5143) View, facing northeast, of the parking lot and tennis court that runoff and drain into the rain garden.



Photograph 35. Memorial Park Rain Garden #3: (DSCN5144) View, facing north, of the adjacent tennis court which flows into the rain garden.



Photograph 36. Memorial Park Underground Storage Tank: (DSCN5145) View of Pavilion #1 at Terre Hill Community Memorial Park. Rainwater from the roof of the pavilion is stored in an underground 2,000-gallon storage tank. Some stormwater is also able to collect through the inlet drain to the tank.



Photograph 37. Memorial Park Underground Storage Tank: (DSCN5147) View, facing north, of the drain into the underground storage tank that collects rainwater from park pavilion and surrounding area.