



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 18, 2022  
**Regulatory Program(s):** National Pollutant Discharge Elimination System (NPDES)  
**Type of Activity:** Municipal Separate Storm Sewer System (MS4) Program  
**Site/Facility Name:** Highspire Borough MS4  
**Site/Facility Address:** 640 Eshelman Street, Highspire, PA 17034  
**Latitude:** 40.2053N **Longitude:** 76.7737W  
**County/Parish:** Dauphin County  
**General Permit #:** PAG-13  
**Specific Permit #:** PAG133544  
**Main Surface Water:** Laurel Run/ Swatara Creek /Susquehanna River  
**NAICS Code:** 924110 **SIC:** 9511  
**Unique Project #:** 3E23WN003A

**Site/Facility Representative(s):**

**Point of Contact**

Randy Kreider, Public Works Superintendent



Highspire Borough

Phone: 717-939-6204

Email: rkreider@highspire.org

Kara Kalupson, Rettew

Highspire Borough

Phone: 717-431-3706

Email: Kara.kalupson@rettew.com

**EPA Inspectors:**

Shane McAleer

Phone: (215) 814-5616

Email: mcaleer.shane@epa.gov

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:**

Heather Dock, Pennsylvania Department of Environmental Protection

Phone: (717) 439-5080

Email: hdock@pa.gov

Cody Hoy, Pennsylvania Department of Environmental Protection

Phone: (717) 503-6264

Email: cohoy@pa.gov

Gold, Peter

Digitally signed by Gold,  
Peter  
Date: 2022.12.29  
15:19:05 -05'00'

**Report Preparer  
Signature/Date**

Edward Simas, Inspector

Date

NPDES Section

MARK

Digitally signed by MARK  
ZOLANDZ  
Date: 2022.12.29  
15:42:49 -05'00'

ZOLANDZ

**Supervisor  
Signature/Date**

Mark Zolandz, Acting Section Chief

Date

NPDES Section

Unique Project#: 3E23WN003A

## Table of Contents

|                                              |   |
|----------------------------------------------|---|
| I. Introduction .....                        | 3 |
| A. Inspection Opening Conference .....       | 4 |
| B. Weather and Precipitation Conditions..... | 4 |
| II. MS4 Activity .....                       | 4 |
| III. Observations .....                      | 5 |
| IV. Records Review .....                     | 8 |
| V. Closing Conference.....                   | 9 |

## List of Attachments

|                |                                                                    |
|----------------|--------------------------------------------------------------------|
| Attachment 1:  | NPDES Permit PAG-13                                                |
| Attachment 2:  | 2022 MS4 Annual MS4 Report                                         |
| Attachment 3:  | PCSM BMP As-built Plans                                            |
| Attachment 4:  | 2022 MS4 Training Records                                          |
| Attachment 5:  | Photo Log                                                          |
| Attachment 6:  | Pollution Prevention & Good Housekeeping Plan (PPGHP)              |
| Attachment 7:  | Pollution Prevention & Good Housekeeping Plan Storage of Materials |
| Attachment 8:  | Barnett Tract Proposed Construction Plans                          |
| Attachment 9:  | Republic - Spectrum Proposed Construction Plan                     |
| Attachment 10: | Highspire Borough Response to PADEP MS4 Insp Rep                   |
| Attachment 11: | PCSM BMP Inventory                                                 |
| Attachment 12: | 2020 Outfall Screening Report                                      |
| Attachment 13: | Outfall Map                                                        |
| Attachment 14: | PADEP MS4 CEI Inspection (2021)                                    |

## **I. Introduction**

On October 18, 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 Highspire Borough ("Borough") at the Borough maintenance facility. The purpose of the inspection was to review the Borough'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. PAG133544 (“Permit”).

Prior to the inspection, the EPA Inspection Team reviewed the Attachment 1 – NPDES Permit PAG-13. The Inspection Team also requested and reviewed Attachment 2 – 2022 MS4 Annual Report; Attachment 3 – PCSM BMP As-built Plans; Attachment 4 – 2022 MS4 Training Records; Attachment 5 – Photo Log; Attachment 6 – Pollution Prevention & Good Housekeeping Plan (PPGHP); Attachments 7 – Pollution Prevention & Good Housekeeping Plan Storage of Materials; Attachment 8 – Barnett Tract Proposed Construction Plan; Attachment 9 – Republic - Spectrum Proposed Construction Plan; Attachment 10 – Highspire Borough Response Letter to PADEP 2021 MS4 Inspection Report; Attachment 11 – PCSM BMP Inventory; Attachment 12 – 2020 Outfall Screening Report; Attachment 13 – Outfall Map; Attachment 14 – PADEP MS4 CEI Inspection (2021).

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 four PCSM facilities that were selected by the EPA Inspection Team prior to the inspection and one of the Borough's maintenance yards. The EPA inspection team also visited “Outfall 28” which was noted in PADEP’s 2021 CEI Inspection Report to be eroded and causing significant sedimentation into Burd Run.

The photographs for this report were taken by Peter Gold. Photographs for this report have been processed in order to assign to each photo the original camera-generated file name (e.g., IMAG0032). The camera-generated file name is used to identify each photo in the main narrative of this inspection report. 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 maintenance facility at approximately 9:38 am. The EPA Inspection Team identified themselves to the Borough representatives as Edward Simas and Peter Gold. The state inspectors present on site were Heather Dock and Cody Hoy of PADEP. The EPA inspection team displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team met with Randy Kreider and Kara Kalupson, representing the Borough. The inspection began at the Highspire Borough Sewage Treatment Plant which is also utilized as the Borough's maintenance facility. The inspection team then proceeded to the following four structural PCSM BMPs: Osage Pipe, Barnet Tract, Republic Service (formerly Spectrum), and the rain garden located at the Sewage Treatment Plant. The EPA Inspection Team finished the inspection at Outfall 28. The EPA Inspection Team's observations are listed later in this document and are grouped by type of observation.

### 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) <sup>1</sup> |
|----------------------|----------|--------------------------------------------|
| PALMYRA 2.1 S, PA US | 10/13/22 | 0.07                                       |
| 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                                       |

## II. MS4 Activity

Highspire Borough is located in Dauphin County, Pennsylvania. The population was 2,736 at the 2020 census. The Borough is part of the Harrisburg–Carlisle Metropolitan Statistical Area. The Borough is in southern Dauphin County on the northeast bank of the Susquehanna River. The Borough has a total area of 0.74 square miles (1.92 km<sup>2</sup>), of which 0.72 square miles (1.86 km<sup>2</sup>) is land and 0.02 square miles (0.06 km<sup>2</sup>), or 2.96%, is water.

The Borough owns and operates a 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. There are 39 existing regulated outfalls that have been identified for annual inspection and illicit discharge tracking according to the Borough's 2022 Annual Report (Attachment 2). The Borough is authorized to discharge stormwater runoff from the MS4 under the terms and conditions of its Permit (Attachment 1).

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

### III. Observations

The EPA Inspection Team conducted inspections of the Borough's municipal maintenance facility (inside the Sewage Treatment Plant) as well as four PCSM facilities. The EPA inspection team observed no MS4 drainage conveyances inside of the sewage treatment plant. The Borough confirmed that only sanitary conveyances are located on the premises. The observations by the EPA Inspection Team are identified below.

#### **Observation #1:**

##### *Highspire Sewage Treatment Plant Maintenance Yard – Conveyances*

The EPA inspection began the inspection at the Borough's maintenance yard, located inside the Highspire Sewage Treatment Plant. For photographs pertaining to the Highspire Sewage Treatment Plant Maintenance Yard, refer to DSCN3487 through DSCN3512 of the Photo Log (Attachment 5). The maintenance garage, brine storage and washing area, and woody waste storage area were all observed. EPA began the inspection at the salt storage area. The shed is roofed and covered on three sides with an open front and is tarped (DSCN3487). The rain garden at the northeast corner of the plant appeared to be well maintained with adequate rip rap (DSCN3488, DSCN3489). Adjacent to the rain garden was the fenced off woody waste storage area which also included an area to store street sweeping materials. The Borough stated that the woody waste is stored in that area until it is composted. The street sweeping materials were observed to be tarped in the same area. The team walked through the entire headworks of the plant, however there were no stormwater conveyances. Wash water from vehicle washing within the Sewage Treatment Plant flows through a trench drain adjacent to the salt storage area into an underground tank where it is pumped back to the headworks of the plant (DSCN3507). The maintenance garages included no stormwater drainage conveyances. The Borough stated that any used oil from maintenance activities is deposited into the used oil secondary containment area (DSCN3503 - DSCN3506). The EPA Inspection Team observed an uncovered asphalt cold patch in front of a white pick-up truck on the east side of the secondary containment chemical area (DSCN3506).

#### **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 #2:**

The Borough's 2022 Annual Report (Attachment 2) contains documentation of the Borough's inventory of outfalls and its efforts to conduct dry weather screening. According to the annual report, 39 unique outfalls have been screened within the five years and none have revealed dry weather flow or signs of illicit discharge.

**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 #3:**

The Borough provided the EPA Inspection Team with its PCSM BMP Inventory for 2022 (Attachment 11), which describes their efforts regarding PCSM facilities. The PCSM inventory did not specify an inspection frequency for each BMP. According to Attachment 3, it was unclear if any PCSM BMP inspections were completed during the July 1, 2021 to June 30, 2022 reporting period.

**Observation #4:**

As-built plans (Attachment 3) for three PCSM BMPs were requested and reviewed by the EPA Inspection Team for the inspection. The EPA Inspection Team inspected four BMPs: Osage Pipe, Barnet Tract, Republic Service (formerly Spectrum), and the rain garden inside of the Sewage Treatment Plant. Osage Pipe was added to the inspection due to prior housekeeping concerns outlined by PADEP in its 2021 MS4 CEI Inspection (Attachment 14), however the as-built plan was not reviewed by the EPA Inspection Team. It appeared that all three of the BMPs were constructed at the locations identified in their respective as-built plans (Attachment 3). Observations for Republic Service, Barnet Tract, and Osage Pipe are described below (see Observation #1 for the rain garden).

**Observation #5:**

*Republic Service Detention Basin*

The EPA Inspection Team observed the Spectrum Recycling BMP (now owned and maintained by Republic Services). For photographs pertaining to this BMP, refer to: DSCN3514 through DSCN3522 of Photo Log (Attachment 5). The BMP is located west of

the Highspire Sewage Treatment Plant. Several deep holes were observed in the detention basin (DSCN3515 - DSCN3516). The Borough stated that they were caused by ground hogs. This observation was also noted in the PADEP MS4 CEI Inspection (Attachment 14). The EPA Inspection Team walked south across the basin and observed erosion at the inlet to the detention basin. A hole was present with standing water directly below the inlet (DSCN3517). The EPA Inspection Team requested the as-built plans for the BMP (Attachment 9). The proposed plan reveals that rip rap was to be located on the west side of the facility estimated to be in the area around the eroded inlet. Rip rap only was observed in front of the outlet structure. It was unclear at the time of inspection when the erosion occurred, however the PADEP 2021 Inspection Report identified the same observation (Attachment 14). The Borough's response to the PADEP MS4 Inspection (Attachment 10) indicated the Borough would update its PCSM inventory to include the required Operation and Maintenance (O&M) activities and a stated frequency of inspections. The EPA Inspection Team did not observe an updated PCSM inventory at the time of the inspection.

#### **Observation #6**

##### *Osage Pipe Detention Basin*

The EPA Inspection Team visited Osage Piping and Fabrication Inc. ("Osage Piping"), west of Republic Services and the Highspire Sewage Treatment Plant. For photographs pertaining to the Osage Piping detention basin, refer to: DSCN3538 through DSCN3540 of the Photo Log (Attachment 5). Osage Piping is responsible for the maintenance of the detention basin located to the south end of their facility. It was noted in the PADEP 2021 inspection report (Attachment 14) that the BMP previously included excessive sediment, debris, and or trash deposits. At the time of the inspection, there appeared to be no sedimentation or debris at the site. The Borough informed the EPA Inspection Team that they had notified Osage Piping regarding the necessary maintenance.

#### **Observation #7**

##### *Barnet Tract Infiltration Basin*

Barnet Tract infiltration basin is located directly north of the Highspire Sewage Treatment Plant on Lumber Street. For photographs pertaining to the Barnet Tract infiltration basin, refer to: DSCN3524 through DSCN3530 and DSCN3534 of the Photo Log (Attachment 5). NDS, LLC is responsible for the operation and maintenance of the basin. The basin appears to service at least five houses within the vicinity. The Borough's 2022 Annual Report stated that the basin is inspected 4 times a year and after rain events greater than 1". At the time of inspection, the basin contained about 1-2ft of water (DSCN3529). The Borough stated that there is an underdrain beneath the basin that flows into a natural vegetated area adjacent to the basin (DSCN3530). There is a release valve noted on the construction plan of the basin (Attachment 8) that is to be opened during high rain events, the Borough stated the valve was open at the time of the inspection. The 40' 4" underground piping is noted in the plan. The Borough also stated that there is a 6" end of the drain open to air underground that is normally capped off. The Borough stated they would notify NDS, LLC of the drainage issues occurring within the basin. During the inspection, it appeared water was not properly draining from the basin.

**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 #8**

The Borough submitted a written O&M plan that identifies all facilities with potential sources of stormwater runoff (Attachments 6 & 7). The plan also documents how materials are stored on site.

**Observation #9**

*Outfall 28*

The team finished the inspection at Outfall 28, which flows into Burd Run. For photographs pertaining to Outfall 28, refer to: DSCN3532 through DSCN3533 of the Photo Log (Attachment 5). At the time of the inspection, there appeared to be woody debris and sedimentation around the outfall. The area around the outfall appeared to be eroding into the stream. PADEP previously noted this in their 2021 inspection report (Attachment 14). At the time of inspection, there appeared to be no additional stabilization controls observed around the outfall.

**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 #10:**

The Borough provided documentation on its employee training program (Attachment 4 – 2022 MS4 Training Records). According to the documents, the Borough conducted pollution prevention and good housekeeping training for its staff for the reporting period 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 11:35 a.m. (EDT).