



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

**Four Penn Center – 1600 John F. Kennedy Blvd.
Philadelphia, Pennsylvania 19103**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 06/22/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: Borough of Steelton MS4
Permittee(s): Borough of Steelton
Site/Facility Operator: Borough of Steelton
Site/Facility Address: 123 North Front Street
Steelton, PA 17113
Latitude: 40.2359 **Longitude:** -76.8417
County/Parish: Dauphin
General Permit #: PAG-13
Site Specific Permit #: PAG133625
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN088A

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

Jeffrey Baltimore – Borough of Steelton Public Works Director
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**Report Preparer
Signature/Date**

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Date

**Supervisor
Signature/Date**

Michael Greenwald, Acting Section Chief
NPDES Enforcement Section, (3ED32)

Date

Unique Project#: 3E22WN088A

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List of Attachments

- Attachment A: Photograph Log
- Attachment B: NPDES General Permit
- Attachment C: Steelton Borough 2020 and 2021 Annual Reports
- Attachment D: PCSWM BMP Plans

I. Introduction

On June 22, 2022, an inspection team composed 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) at the Borough of Steelton (“Borough” or “Steelton”) Maintenance Yard at 282 Christian Street, Steelton, PA. At the Maintenance Yard, the EPA Inspection Team met with Jeff Baltimore, Steelton Public Works Director, and Randy Watts, Borough Engineer from Herbert, Rowland, & Grubic, Inc. (HRG) and explained the purpose of the visit was to perform a compliance evaluation inspection (CEI) of the Borough’s Municipal Separate Storm Sewer System (MS4) program to assess compliance with National Pollutant Discharge Elimination System (NPDES) General Permit No. PAG133625, issued by PADEP, effective date May 1, 2018. The Inspection Team conducted an inspection of minimum control measures (MCMs) 5 and 6 of the Borough’s MS4 program and a review of the Borough’s Annual Reports regarding MCM 3. The EPA Inspection Team inspected the Borough’s Maintenance Yard, which contained the Maintenance Shop/Lab/Garage (referred to as “Maintenance Shop”), as well as the one post construction stormwater management (PCSWM) best management practice (BMP) that was identified by the Borough prior to the inspection. The photographs for this report have been processed in order to assign to each photo the original camera-generated file name (e.g., IMAG0032) and the date and time the photo was taken (e.g., 2022-06-22--15.53.01). 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. Unused photos are available upon request.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Borough-owned facility (Maintenance Yard) located at 282 Christian Street at approximately 1:30 PM for the announced inspection. Chuck Schadel and Shane McAleer of the EPA identified themselves to the Borough Representatives, displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team with Borough representatives then walked and inspected the facility. The Inspection Team’s observations are listed later in this document and are grouped by type of observation made.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Shane McAleer	EPA Region III	(215) 814-5616	mcaleer.shane@epa.gov
Chuck Schadel	EPA Region III	(215) 814-5761	schadel.chuck@epa.gov
Site/Facility Representatives			
Jeffrey Baltimore	Borough of Steelton	(717) 585-3120	jbaltimore@steeltonpa.com
Randy Watts	HRG	-	-
State or County Representatives			
Scott Arwood	PADEP	(717) 783-0368	sarwood@pa.gov
Leah Staley	PADEP	(717) 705-4814	lestaley@pa.gov
Heather Dock	PADEP	-	hdock@pa.gov

B. Weather and Precipitation Conditions

During the inspection, weather was partly 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 1 below:

Table 1. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Carlisle Water Plant, PA US USC00361920	06/17/2022	0.0
Carlisle Water Plant, PA US USC00361920	06/18/2022	0.0
Carlisle Water Plant, PA US USC00361920	06/19/2022	0.0
Carlisle Water Plant, PA US USC00361920	06/20/2022	0.0
Carlisle Water Plant, PA US USC00361920	06/21/2022	0.0
Carlisle Water Plant, PA US USC00361920	06/22/2022	0.09

II. Facility Activity

The Borough of Steelton is in Dauphin County, Pennsylvania. The Borough is approximately 4 miles southeast of the City of Harrisburg and is bordered by (and encompassed within) the Township of Swatara to the north and Township of Lower Swatara to the south. The Susquehanna River is a few hundred feet west of the Borough, with Cumberland County to the northwest and York County to the southwest. The Borough has an area of 1.9 square miles and a population of 6,263 residents, according to the 2020 census. According to the Borough's Operations and Maintenance Plan, updated March 2019, there are 17 Borough-owned facilities and activities requiring operations and maintenance, including the Maintenance Yard (listed as "Maintenance Garage" in the Annual Report) which was inspected. According to the Borough's MS4 Annual Report for 2021, the only PCSWM BMP in the Borough is an underground infiltration basin owned by Steel Works LLC ("Steel Works"), which was observed during the inspection.

Prior to the inspection, the EPA Inspection Team requested the design plans for the Steel Works PCSWM BMP from the Borough and the 2020 and 2021 Borough MS4 Annual Reports from PADEP. The Annual Reports were provided and reviewed prior to the inspection to assess for compliance with the General Permit. The Steel Works design plans were provided during the inspection and reviewed.

The EPA Inspection Team inspected two locations during the inspection: 1) the Municipal Yard, which included the Maintenance Shop; and 2) the Steel Works PCSWM BMP. The observations made by the EPA Inspection Team are identified below.

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

III. Observations

Location #1 - Maintenance Yard

During the inspection of the Maintenance Yard, the EPA inspection Team walked the Yard and parking lot and observed the Maintenance Shop, which included a washbay containing floor drains, an Oil / Water Separator (OWS), and the Salt Storage Barn.

Good Housekeeping

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”

MCM 6 best management practice (BMP) 2 of the General Permit 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 #1:

During the inspection of the Maintenance Yard, staining was observed on the pavement outside of the Maintenance Shop where it is potentially exposed to stormwater transport. The conditions at the time of inspection can be observed in photos DSCN3405 and DSCN3406 of the Photo Log. Drainage contours from this area appeared to direct flow towards an inlet located in Christian Street. The inlet was observed to contain a filter sock (see photo DSCN3414). The washbay for the Maintenance Shop was observed, which contained floor drains that lead to the OWS (see photo DSCN3409).

Jeff Baltimore, Borough Public Works Director, stated that the staining was the result of leaking of hydraulic fluid from a blown hydraulic line on a street sweeper owned by the neighboring municipality Swatara Township. The leaking street sweeper was on loan by Swatara Township in order to perform Borough street sweeping while the Borough’s street sweeper was being serviced.

Observation #2:

During the inspection of the Maintenance Yard, salt was observed on the pavement outside of the Salt Storage Barn where it is potentially exposed to stormwater transport. The conditions at the time of inspection can be observed in photos DSCN3411, DSCN3412, and DSCN3413 of the Photo Log.

Dry Weather Screening

The General Permit requires “For new permittees, 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 “...for existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by March 15, 2023.”

Observation #3:

According to the 2020 and 2021 Annual Reports, the Borough, which is an existing permittee, conducted dry weather screening on all 30 Borough MS4 outfalls in the past five years. Three of the MS4 outfalls were dry weather-screened in 2020, and an additional three MS4 outfalls were screened in 2021. The dry weather screening reports conducted in 2020 and 2021 are contained in the Annual Reports (See Attachment C).

Location #2 - Steel Works PCSWM BMP

The EPA Inspection Team inspected the one Borough PCSWM BMP identified by the Borough and listed in the Borough 2020 and 2021 Annual Reports, which was an underground infiltration basin located at the Steel Works parking lot. See photos DSCN3415, DSCN3416, and DSCN3421 of the Photo Log.

Operation and Maintenance of PCSWMBMPs

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...”

Observation #4:

The plans for the Steel Works PCSWM BMP were provided by the Borough and reviewed by the EPA Inspection Team during the inspection (see photo DSCN3418). During the field inspection, the visible components of the BMP appeared to match the plans.

IV. Records Review

The EPA Inspection Team reviewed the 2020 and 2021 Annual Reports for Steelton Borough, which contained, among other items, the Operations and Maintenance Plan for the Borough. The EPA Inspection Team also reviewed the General Permit and the Steel Works PCSWM BMP plans.

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 2:15 PM (EDT).