



**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)
Permittee(s): Wormleysburg Borough MS4
MS4 Address: 20 Market Street, Wormleysburg, PA 17043
Latitude: 40.2492N **Longitude:** 76.8911W
County/Parish: Cumberland County
General Permit #: PAG-13
Specific Permit #: PAG133616
Main Surface Water: Susquehanna River
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E23WN001A

MS4 Representative(s):

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State/Local Inspectors:

No state or local inspectors in attendance.

**Report Preparer
Signature/Date**

Edward Simas, Inspector
NPDES Section

Date

**Supervisor
Signature/Date**

Mark Zolandz, Acting Section Chief
NPDES Section

Date

Unique Project#: 3E23WN001A

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List of Attachments

Attachment 1:	NPDES Permit PAG-13
Attachment 2:	2022 Annual Report
Attachment 3:	PCSM BMP Inventory
Attachment 4:	PCSM Facility As-built Plans
Attachment 5:	MS4 Outfall Dry Weather Screening Report 2021 – 2022
Attachment 6:	Pollution Prevention & Good Housekeeping Plan
Attachment 7:	Photo Log
Attachment 8:	Wormleysburg Sanitary Sewer Plan
Attachment 9:	MS4 Outfalls Map
Attachment 10:	Rain Garden & Infiltration Pond 2022 PCSM Inspections
Attachment 11:	2021-2022 Training Log

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 the Wormleysburg Borough MS4 ("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. PAG133616 (“Permit”).

Prior to the inspection, the EPA Inspection Team reviewed Attachment 1 – MS4 General Permit. Post inspection, the EPA Inspection Team requested and reviewed Attachment 2 – 2022 Annual Report and Attachment 3 – 2022 Post-Construction Stormwater Management (PCSM) Facility Inspections. The EPA Inspection Team compared the PCSM BMP as-built plans on site to ensure accuracy (Attachment 4 – PCSM Facility As-Built Plans). Attachment 5 – MS4 Dry Weather Outfall Screening Report 2021-2022; Attachment 6 – 2020-2021 MS4 Operation and Maintenance Plan; Attachment 7 – Photo Log; Attachment 8 – Wormleysburg Sanitary Sewer Plan; and Attachment 9 – MS4 Outfall Map are also included in the report attachments. Attachments 10 and 11 document annual employee training and PCSM BMP inspections.

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

The photographs for this report’s Photo Log (Attachment 7) were taken by Chuck Schadel. Unused photos are digitally stored and maintained in the inspection file and are available upon request.

A. Inspection Opening Conference

The Borough owns and operates an 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. The EPA Inspection Team arrived at the Borough's maintenance facility at approximately 1:30 pm. The EPA Inspection Team identified themselves as Edward Simas and Chuck Schadel to the Borough representatives, displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team met with the Borough representatives, Craig Schultz and Jeremy Smith, at the Public Works maintenance yard. The yard contained two garages and a salt storage area. After inspecting the yard, the team visited two post construction stormwater management facilities, a rain garden and an infiltration basin located at the “Woods at Waterford” housing community. The EPA Inspection Team’s observations for each of these areas are listed later in this document and are grouped by the type of observation.

B. Weather and Precipitation Conditions

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

Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
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

According to the United States Census Bureau, Wormleysburg Borough has a total area of 0.8 square miles (2.072 km²). The Borough is located on the west bank of the Susquehanna River across from the City of Harrisburg. It is located on the eastern border of Cumberland County (bordered to the north and west by East Pennsboro Township and to the south by the borough of Lemoyne). 51 existing regulated outfalls were identified through the “MS4 Outfall Map” (Attachment 5) for annual inspection and illicit discharge tracking.

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

III. Observations

The EPA Inspection Team began the inspection at the Public Works yard which included two garages, and a salt storage area. The EPA Inspection Team then made observations at the two post-construction stormwater BMP's: a rain garden and infiltration basin at the "Woods at Waterford" housing community. The observations made by the EPA Inspection Team are identified below.

Public Works Maintenance Yard – Conveyances

Observation #1:

For photographs pertaining to the Public Works Yard, refer to: DSCN3464 through DSCN3482 of Photo Log (Attachment 7). Garage #1 was confirmed by the Borough representatives to include only sanitary line connections. Inside, a trench drain was observed directly to the back of the garage and a drain immediately outside of the garage door. Originally, MS4 representatives stated that the end point of the drains was unknown. However, EPA requested documentation confirming if the drains led to a sanitary or storm water conveyance. The Borough submitted Attachment 8 - Wormleysburg Sanitary Sewer Plan confirming the sanitary line connections. Garage #1 included an upstairs and a downstairs area. The downstairs area included a motorcycle and skid steer. The upstairs area included storage for paints, grease, and chain lubrication. A small trash pump and tennis court surfacing was also observed.

The location of Garage #2 was located directly west of the public works yard following S. River Street. The address of this garage appeared inaccurate compared to the location seen during the inspection (See Attachment 6 – Pollution Prevention and Good Housekeeping). The EPA Inspection Team observed that this garage contained no inner drainage conveyances. Additionally, MS4 representatives stated that no maintenance is performed inside the garage. It is utilized to store a leaf collector and snowplow attachments. The Borough stated that there is daily sweeping in the morning around the garage.

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) indicates that 100% of the Borough's 51 existing outfalls have been screened within the required five-year reporting period. According to the "2021 – 2022 Outfall Dry Weather Screening Report" (Attachment 5), no specific outfalls revealed any potential illicit discharge signs.

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 (Attachment 3), which describes their efforts regarding post-construction stormwater management facilities. As-built plans (Attachment 4) for two PCSM BMPs were requested and reviewed by the EPA Inspection Team.

The EPA Inspection Team inspected the Borough’s BMPs (rain garden & infiltration basin) located within the “Woods at Waterford” housing community. Both BMPs were constructed at the locations noted in the plans. During the inspection, the EPA Inspection Team noted that the rain garden appeared bare in several areas (Photo DSCN3485). MS4 representatives stated that tree removal had occurred in the area, and this was a possible cause for the bare areas. MS4 representative were unclear when tree removal took place or when the areas would be maintained.

The infiltration basin was located across the street from the rain garden. The EPA Inspection Team observed adequate vegetation and rip rap at the outlet of the basin (Photo DSCN3486). The basin flows into a downhill stream that eventually leads to the Condoguinet Creek. The BMP also includes a rock swale located downhill of the basin before reaching the stream. At the time of the inspection, the location of the rock swale was unclear. However, the swale is documented in the as built BMP plan reviewed prior to the inspection (Attachment #4). EPA requested photo documentation of the area of the rock swale leading to the creek after the inspection. MS4 representatives sent over supplemental pictures to EPA after the inspection documenting the rock swale in 2021 &

2022 (DSCNAdd1 & DSCNAdd2). The rock swale appeared to be overgrown with vegetation in photos from both years. For photographs pertaining to the rain garden and infiltration basin, refer to: DSCN3483 through DSCNAdd2 of the Photo Log (Attachment 7).

According to the 2022 PCSM Facility Inspections (Attachment 3), the two PCSM BMPs at the “Woods at Waterford” housing community are inspected “routinely” by the “Berk Homes HOA” entity. It was unclear at the time of inspection how frequent “routinely” is, and what the actual inspection/maintenance activities are for the infiltration basin and rain garden on the property. The Borough stated that the HOA is responsible to maintain this area under the same routine maintenance scheduled as the basin and rain garden.

Observation #4:

The Borough provided the Rain Garden & Infiltration Pond 2022 PCSM Inspections (Attachment 10) to EPA that indicates the Borough conducted PCSM BMP inspections in accordance with the Permit for 2022.

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

The Permit requires the permittee to "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.*

Observation #5:

Photographs of the public works yard are provided in photographs DSCN3464 - DSCN3482, including the brine storage area (Photographs DSCN3468 - DSCN3471). Brine was covered by an open-ended tarped shed, and the salt appeared to run off the front end of the storage facility (Photograph DSCN3468). Additionally, an asphalt cold patch was observed in the front left corner of the shed. It appeared it would potentially run off the storage facility if left without additional coverage.

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

BMP #3: Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance and repair

activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee's overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

...

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

Observation #6:

The Borough provided its 2021 – 2022 Training Log (Attachment 11) indicating that appropriate stormwater training topics were in place annually for its staff each reporting period. Attachment 11 documents the types of training conducted for 2021 – 2022 and who was present.

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 2:20 PM (EDT).