



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 04/20/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: Mechanicsburg Borough MS4
Permittee(s): Mechanicsburg Borough
Site/Facility Operator: Mechanicsburg Borough
Site/Facility Address: 36 West Allen Street
Mechanicsburg, PA 17055
Latitude: 40.241080 **Longitude:** -77.010210
County/Parish: Cumberland
General Permit #: PAG013
Site Specific Permit #: PAG133553
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN080A

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

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Date

Unique Project#: 3E22WN080A

Table of Contents

I. Introduction 3

 A. Inspection Opening Conference 3

 B. Weather and Precipitation Conditions..... 3

II. Site/Facility Activity 4

III. Observations 4

IV. Records Review 5

V. Closing Conference..... 5

List of Attachments

- Attachment A: Photo Log
- Attachment B: Permit
- Attachment C: PCSWMBMP Plans

I. Introduction

On April 20, 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 Mechanicsburg Borough Highway Garage at 108 West Allen Street Mechanicsburg, PA. At the facility, the EPA Inspection Team met with C H Lehr (Mechanicsburg Borough) and Greg Rogalski (Pennoni Associates, Borough Engineer). The Inspection Team was conducting an inspection of minimum control measures (MCMs) 5 and 6 of the borough’s Municipal Separate Storm Sewer System (MS4) program and a review of MCM 3 from the borough’s Annual Reports. The EPA Inspection Team inspected three post construction stormwater management best management practices (PCSWMBMPs) that were selected by the EPA Inspection Team prior to the inspection and the borough’s municipal yard. 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., 2022-03-19--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 facility located at 108 West Allen Street at approximately 9:00 AM for the announced inspection. The EPA Inspection Team identified themselves to the Borough Representatives, displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team with the Borough Representative then walked the facility and visited the four PCSWMBMPs. The Inspection Team’s observations are listed later in this document and are grouped by type of observation made.

B. Weather and Precipitation Conditions

During the inspection, weather was sunny. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 1. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Carlisle Water Plant, PA US USC00361920	04/15/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/16/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/17/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/18/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/19/2022	0.87
Carlisle Water Plant, PA US USC00361920	04/20/2022	0.00

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

II.Site/Facility Activity

The Mechanicsburg Borough is in Cumberland County Pennsylvania. The borough is bordered to the east by Lower Allen Township, to the west by Silver Spring and Monroe Townships, to the south by Upper Allen Township and to the north by Hampden Township. The borough has an area of 2.41 square miles and a population of approximately 9,300 residents.

Observations

Prior to the inspection the EPA Inspection Team chose and requested the design plans for three PCSWMBMPs and the operation and maintenance plans for the Borough. In addition, the inspection team requested the 2020 and 2021 MS4 Annual Reports for the borough. These documents were reviewed prior to the inspection and assessed for permit compliance. The EPA Inspection Team inspected the municipal yard and PCSWMBMPs. The observations made by the EPA Inspection Team are identified below.

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...”

Section 3.5 of the Borough’s Pollution Prevention and Good Housekeeping Program for Municipal Operations MCM #6 states that “Dry spills are to be swept and cleaned up immediately, based on the safety to do so, to prevent transmittal to stormwater or dispersion by wind.”

Observation #1:

During the inspection of the Highway Garage the EPA Inspection Team observed piles of cold patch asphalt, salt, compost material and aggregate outside of their storage areas where they could potentially be entrained in stormwater runoff (Photographs DSCN2678 through DSCN2680 of the Photo Log).

Dry Weather Screening

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:

According to the 2020 and 2021 Annual Reports there are 27 MS4 outfalls within the Borough. Dry weather screens were not conducted in either the 2020 or 2021 reporting period according to the Annual Reports.

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...”

Section 2.3.c of the Borough’s Pollution Prevention and Good Housekeeping Program for Municipal Operations MCM #6 states “...Vegetative basin cover is to be maintained at 95%. Areas of bare or sparse vegetation is to be addressed by soil aerating, conditioning, seeding and mulching (as necessary) to restore a proper vegetative cover....”

Observation #3:

The plans for the PCSWMBMPs were requested and reviewed by the inspection team prior to the inspection. It appeared during the inspection that the BMPs were located, configured, and contained the inlets and outlets as depicted in the plans.

The EPA Inspection Team inspected three PCSWMBMPs within the Borough:

The BMP at the Soldiers in Sailors Park appeared to be well vegetated and maintained (Photograph DSCN2686 of the Photo Log).

The BMP at Rutters had trash in one of the detention facilities (Photograph DSCN2695 of the Photo Log), the BMP also had some areas around the swale with sparse vegetation (Photograph DSCN2701 of the Photo Log).

The BMP at Keystone appeared to have bare soils and a potential sink hole around one of the outflow structures (Photographs DSCN2707 and DSCN2709 of the Photo Log). A general view of the BMP can be seen in Photograph DSCN2706.

III. Records Review

The EPA Inspection Team reviewed the 2020 and 2021 Annual Reports for Mechanicsburg Borough, the Borough’s Pollution Prevention and Good Housekeeping Program for Municipal Operations MCM #6, the General Permit and PCSWMBMP plans.

IV. 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 11:00 AM (EDT).