



**CORNWALL BOROUGH MUNICIPAL SEPARATE STORM SEWER SYSTEM
(MS4) PROGRAM
INSPECTION REPORT**

**City of Lebanon – 735 Cumberland Street
Lebanon, PA 17042**

**Pre-Inspection Conference Call: August 1, 2024
Field Inspection Date: August 8, 2024**

Report Date: October 1, 2024

DSB ID Number: ECAD-5511

**U.S. Environmental Protection Agency, Region 3
Enforcement and Compliance Assurance Division
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Table 1. Summary of Permit Requirements and Inspection Observations

(The following observations are based on the information provided by the Borough).

Program Element	Observations
Overall Program Management	No areas of concern noted at this time.
Illicit Discharge Detection and Elimination (IDDE)	Observation 1: The IDDE Program Plan provided by the Borough did not appear to include all Permit-required components. Observation 2: The Borough MS4 maps are dated 8/8/2017 and 9/5/2017. It was unclear when the maps were last evaluated to determine whether updates were necessary. Observation 3: The Borough's MS4 mapping did not appear to include all Borough outfalls. Observation 4: The Borough was not conducting dry weather screening of its MS4 outfalls.
Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment	Observation 5: The inventory of Borough-owned/operated post-construction stormwater management best management practices (PCSM BMPs) provided by the Borough did not appear to include all Permit-required components. Observation 6: The Borough did not provide the EPA Inspection Team with as-builts or design plans for all sites. The EPA Inspection Team could not verify if the Borough maintains all BMPs as designed. Observation 7: The Borough's inventory of PCSM BMPs shows the most recent "Date of Last Inspection" as 6/9/2017. It was unclear when the inventory of PCSM BMPs was last evaluated to determine if updates were necessary. Observation 8: BMP #24 had vegetation overgrowing the inlet's headwall. The Borough did not appear to ensure adequate O&M of BMP #24.

Program Element	Observations
	Observation 9: BMP #38 had grass around its outlet structure and a sinkhole. The Borough did not appear to ensure adequate O&M of BMP #38.
Pollution Prevention / Good Housekeeping (PPGH)	Observation 10: It was unclear when the Borough's list of Borough-owned/operated facilities that have the potential for generating pollution in stormwater runoff was last evaluated to determine whether updates were necessary. Observation 11: The EPA Inspection Team made several observations related to improper implementation of O&M procedures at the Borough's Department of Public Works Facility and Yard. Observation 12: The Borough's lists of Borough-owned/operated facilities was dated December 2017. It was unclear when the written O&M program was last evaluated to determine whether updates were necessary.
Pollutant Control Measures and Pollutant Reduction Plans	No areas of concern noted at this time.

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- Appendix C: Exhibit Log
- Appendix D: Design Plans Log

INTRODUCTION

On August 1, 2024, and August 8, 2024, an EPA Region 3 representative and EPA contractors Eastern Research Group, Inc. (hereinafter, EPA Inspection Team) performed a compliance inspection of the Cornwall Borough's (hereinafter, Cornwall, or the Borough) Municipal Separate Storm Sewer System (MS4). The inspection was conducted to assess the Borough's compliance with the requirements of the Commonwealth of Pennsylvania's *National Pollutant Discharge Elimination System (NPDES) General Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. PAG133700; hereinafter, the "Permit"). A copy of the Permit is provided in Appendix A.

The purpose of this inspection was to obtain information to assist EPA Region 3 in assessing the Borough's compliance with the requirements of the Permit, as well as the implementation status of its MS4 program. The presentation of observations in this report does not constitute a formal compliance determination or notice of violation.

The inspection focused on overall program management and the following Permit components:

- Illicit Discharge Detection and Elimination (IDDE);
- Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment;
- Pollution Prevention / Good Housekeeping; and
- Pollutant Control Measures and Pollutant Reduction Plans.

The EPA Inspection Team obtained information through a records review and interviews with Borough staff. Interviews were conducted during the pre-inspection conference call ("Conference Call") and during the field inspection. The following primary representatives participated in the inspection:

Borough

Representatives: Cody Rhoads – Borough Manager, crhoads@cornwall-pa.com, 717-274-3436
Tom Smith – Borough Public Works Director, tsmith@cornwall-pa.com, 717-821-9926
Jeff Steckbeck – P.E., Borough Engineer (Steckbeck Engineering & Surveying, Inc., hereafter "SESI"), jsteckbeck@steckbeck.net, 717-272-7110 ext. 101
Chad Smith – Borough Engineer, csmith@steckbeck.net, 717-222-2870
Darren Heisey – Engineer in Training (SESI), dheisey@steckbeck.net, 717-606-7651

EPA

Representative: Chuck Schadel – EPA Region 3, Schadel.Chuck@epa.gov, 215-341-1561
Amrita Gupta – EPA Region 3, Gupta.Amrita@epa.gov, 303-668-2940

State

Representatives: Scott Arwood – Pennsylvania Department of Environmental Protection (PADEP), sarwood@pa.gov, 717-705-4707
Leah Staley – PADEP, lestaley@pa.gov, 717-705-4814
Neenu Jeeth – PADEP, njeeth@pa.gov, 717-705-7753
Jacob Rakowsky – PADEP, jrakowsky@pa.gov, 717-705-4918

EPA

Contractors: Taylor Fontaine – Eastern Research Group, Inc. (ERG), Taylor.Fontaine@erg.com, 703-956-1977
Cassidy Owen – ERG, Cassidy.Owen@erg.com, 804-314-7688
Kelsey Guy – ERG, Kelsey.Guy@erg.com, 703-633-1103

INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Inspection Team obtained documentation and other supporting information to evaluate compliance with the Permit prior to, during, and after the remote interviews and field inspections. Observations regarding the Borough's implementation of Permit requirements are presented in this report.

On July 18, 2024, the EPA Inspection Team provided the Borough with an inspection notification and a records request that listed documents for review for the inspection, with specific items to be provided prior to the inspection. The Borough provided the requested documents electronically to the EPA Inspection Team utilizing a shared folder on July 26, 2024. The EPA Inspection Team reviewed the documentation and other supporting evidence provided by the Borough regarding compliance with the Permit. Referenced documentation used as supporting information is provided in [Appendix C, Exhibit Log](#).

On August 2, 2024, after the Conference Call portion of the inspections, the EPA Inspection team emailed the Borough an additional list of requested documents. The requested documents were provided on August 6, 2024.

On August 26, 2024, after the field inspections, the EPA Inspection team emailed the Borough an additional list of requested documents. The requested documents were provided on August 28, 2024.

The EPA Inspection Team informed the operator that any information that the site deemed to be confidential business information (CBI) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

The following sections of this report describe the Borough's approach to implementing minimum control measures, the relevant Permit requirements, and observations made during the inspection process.

PRE-INSPECTION CONFERENCE CALL

On August 1, 2024, the EPA Inspection Team conducted a Conference Call with representatives from the Cornwall Borough's MS4 program. The Conference Call focused on overall program management, the three (3) minimum control measures (MCMs) identified above, and the Pollution Reduction Plan (PRP), specifically for areas within the jurisdictional boundary of the Borough's MS4.

FIELD INSPECTION PROCESS

On August 8, 2024, the EPA Inspection Team conducted field inspections of eleven (11) operations subject to MS4 program requirement and oversight: seven (7) Best Management Practices (BMPs) including four (4) detention basins, two (2) infiltration basins, and one (1) constructed wetland, as well as Miner's Village Park, the Department of Public Work's (DPW) Yard, and two (2) project sites: Goosetown Restoration Project and the planned Snitz Creek 2 and 3 Project.

Inspection observations based on information gathered during both the Pre-Inspection Conference Call and the field inspections are documented in the sections below.

The EPA Inspection Team informed the operator that any information that the site deemed to be confidential business information (CBI) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

Photographs were taken during the inspection by the EPA contractors, and are provided in [Appendix B, Photograph Log](#). Some photos may be omitted from the log to avoid redundancy but can be made available upon request.

FIELD INSPECTION OPENING CONFERENCE

The EPA Inspection Team arrived at Cornwall's DPW in Lebanon, PA at 8:30 AM (EDT) on August 8, 2024, which served as a central meeting place for the field inspections. Kelsey Guy and Cassidy Owen of Eastern Research Group, Inc. displayed their EPA-issued Clean Water Act inspector credential to the Borough representatives at the outset of the field inspection and explained that the purpose of the field inspection was to make observations to complement the Conference Call portion of the Cornwall MS4 program inspection conducted August 1, 2024.

The weather during the field inspection on August 8, 2024, was sunny with temperatures averaging approximately 78 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and five (5) days prior are provided in the table below.

Table 2. Total Precipitation Preceding and During Inspection

Station Name	Date	Precipitation Amount (inches) ¹
LITITZ 0.3 WNW, PA US US1PALN0022	August 3, 2024	0.49
LITITZ 0.3 WNW, PA US US1PALN0022	August 4, 2024	0.34
LITITZ 0.3 WNW, PA US US1PALN0022	August 5, 2024	0.00
LITITZ 0.3 WNW, PA US US1PALN0022	August 6, 2024	0.00
LITITZ 0.3 WNW, PA US US1PALN0022	August 7, 2024	1.60
LITITZ 0.3 WNW, PA US US1PALN0022	August 8, 2024	0.07

CORNWALL BOROUGH BACKGROUND

The Borough administers the Cornwall MS4 system. The Borough's MS4 program is primarily administered and implemented by the Borough's DPW. The Borough's Department of Enforcement (i.e., Police) assist with implementing the MS4 program; the Borough staff explained that the MS4 program is primarily funded through a separate MS4 fund, but also receives funding from the Borough's general fund that is used towards MS4 projects. In addition, the Borough receives funding from awarded grant applications.

- The Borough's Manager is responsible for oversight of the DPW and SESI.
- The Borough contracts SESI as the Borough's Engineer. SESI has served as the Borough's engineering firm since January 2022. In this role, SESI assists the Borough with MS4 program plan review, MS4 program document submittal, best management practice (BMP) inspections, and erosion and sediment site plan reviews.
 - Prior to January 2022, the Borough contracted SESI as their MS4 Engineer, switched to the contractor Hanover until going back to contracting SESI in January 2022. SESI developed the Borough's Pollutant Reduction Plan (PRP) in 2017, revising it in 2019. When Hanover became the Borough's engineer, SESI transferred all PRP files to Hanover. SESI was unclear on what happened while Hanover was the Borough's engineer, but the PRP was not approved by PADEP during that time. When SESI became the Borough's engineer again in January 2022, they resubmitted the PRP and received approval from PADEP for their PRP, as well as approval for coverage under the PAG-13 General Permit, effective July 1, 2023 (refer to [Appendix A](#)).
- Under the current Permit, administration of the pollution prevention program was assigned to the DPW with a staff of six (6). The DPW conducts annual cleanings and inspections of inlets, outfalls, and stormwater drainage areas.

SESI developed the Borough's current outfall map (refer to [Appendix C, Exhibit 1](#)) and the Borough's Pollutant Reduction Plan (refer to [Appendix C, Exhibit 2](#)).

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

The Borough collaborates under a Memorandum of Understanding (MOU, refer to [Appendix C, Exhibit 3](#)) with the Lebanon County Conservation District regarding building projects (i.e., NPDES and E&S permitting for construction). The Borough's Zoning and Enforcement Office assists the DPW with MS4 Permit compliance and facilitation.

Borough staff stated that much of their infrastructure is aging, and degradation and infrastructure capacities were concerns for the Borough. The Borough is working to address these concerns through renovations: they replaced 240 feet of stormwater piping two weeks prior to the inspection and plan to incorporate larger piping to accommodate stormwater runoff. According to the Borough representatives, there are no interconnections with neighboring MS4s.

Based on the 2020 Census, the Borough's MS4 covers approximately ten (10) square miles and serves 3,486 people. Per the Borough's Permit, the primary receiving waters for the Borough's MS4 are the Snitz Creek and unnamed tributaries to both the Snitz Creek and the Quittapahilla Creek. The Borough's PRP lists siltation and nutrients as impairments (refer to [Appendix C, Exhibit 2](#)).

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The Borough's Manager administers the Borough's IDDE program via the Borough's DPW. According to the Borough's 2022-2023 annual report, the Borough has 36 MS4 outfalls within its regulated boundary. The EPA Inspection Team reviewed the map provided by the Borough (refer to [Appendix C, Exhibit 1](#)) and noted the inclusion of 35 outfalls.

SESI developed the MS4 BMPs map for the Borough dated "revised August 8, 2017 (refer to [Appendix C, Exhibit 1](#)). The map appears to include all the required components specified in the Permit.

The *Cornwall Borough Stormwater Management Ordinance* (dated 9/12/2022) prohibits illicit discharges into the Borough's MS4 in Article 8 (refer to [Appendix C, Exhibit 4](#)).

Borough residents can report illicit discharges in two ways. Residents can call the Borough's office phone line (not a dedicated line), 24 hours a day, or submit a Borough provided form to the Borough's office. DPW staff stated that they keep a look out for discharges while performing routine maintenance throughout the Borough. If an illicit discharge is suspected or found, SESI contacts, as needed, the Borough's Fire Department for assistance, or the PADEP if needed. Borough representatives stated that most illicit discharges in the Borough originate from spills from vehicle accidents within the Borough.

When asked about dry-weather outfall screening, Borough representatives stated that outfall screenings are done annually, usually in the fall, when cleaning catch basins but not necessarily when it is dry. Outfall screenings are documented only if the Borough finds any concerns and if they require further steps.

The Borough works with an independent lab for water testing for sampling of potential illicit discharges. Some Borough staff are licensed and could perform sampling. Additionally, the Borough can perform dye testing. The Borough's Code Enforcement and Zoning Office along with the Borough's Police Department, as needed, conduct illicit discharge investigations.

SESI provides annual training to Borough staff on all the Permit MCMs (refer to [Appendix C, Exhibits 5, 6 and 7](#)).

Permit Part C.I.B.3.a states, "The permittee shall develop and implement a written program for the detection, elimination, and prevention of illicit discharges into the regulated small MS4. The program shall include the following:

- 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.
- Procedures for screening outfalls in priority areas. The 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.
- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- Procedures for eliminating an illicit discharge.
- 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.
- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
- Procedures for addressing information or complaints received from the public."

Observation 1: The IDDE Program Plan provided by the Borough does not appear to include all Permit-required components (refer to [Appendix C, Exhibit 5](#)). Specifically, the plan does not include procedures for:

- Identifying priority areas;
- Identifying the source of an illicit discharge;
- Eliminating an illicit discharge;
- Assessing potential for illicit discharges caused by the interaction of sewage disposal systems with storm drain systems;
- Program documentation, evaluation, and assessment; and
- Addressing complaints.

Permit Part C.I.B.3.b states, “The permittee shall develop and maintain map(s) that show permittee and urbanized area boundaries, the location of all outfalls and, if applicable, observation points, and the locations and names of all surface waters that receive discharges from those outfalls. Outfalls and observation points shall be numbered on the map(s).

- (1) For existing permittees, the existing map(s) shall be updated and maintained as necessary during each year of coverage under this permit.”

Observation 2: The Borough maintains MS4 maps that identify the MS4 boundaries, outfalls, receiving waters, and public and private storm sewer collection systems within the MS4; dated 8/8/2017 and 9/5/2017 (refer to [Appendix C, Exhibit 1](#)). It was unclear when the maps were last evaluated to determine whether updates were necessary.

Permit Part C.I.B.3.c states, “In conjunction with the map(s) created under BMP #2 (either on the same map or on a different map), the permittee shall develop and maintain map(s) that show the entire storm sewer collection system within the permittee’s jurisdiction that are owned or operated by the permittee (including roads, inlets, piping, swales, catch basins, channels, and any other components of the storm sewer collection system), including privately-owned components of the collection system where conveyances or BMPs on private property receive stormwater flows from upstream publicly-owned components.

- (1) For new permittees, the map(s) must be developed and submitted to DEP as an attachment to an Annual MS4 Status Report by September 30, 2026 or the fourth (4th) Annual MS4 Status Report following issuance of this permit, whichever is later.
- (2) For existing permittees, the existing map(s) shall be updated and maintained as necessary during each year of coverage under this permit.”

Observation 3: The Borough provided the EPA Inspection Team with an MS4 map that identifies the MS4 boundaries, outfalls, receiving waters and drainage areas (refer to [Appendix C, Exhibit 1](#)). The map did not show the entire Borough storm system. The map did not depict the location of an outfall observed near BMP #24 during the field inspection. The Borough’s 2022-2023 annual report states that the Borough’s MS4 system comprises 36 outfalls. At the time of the inspection, only 35 outfalls were mapped.

Permit Part C.I.B.3.d states, “The permittee shall conduct dry weather screenings of its MS4 outfalls to evaluate the presence of illicit discharges. If any illicit discharges are present, the permittee shall identify the source(s) and take appropriate actions to remove or correct any illicit discharges. The permittee shall also respond to reports received from the public or other agencies of suspected or confirmed illicit discharges associated with the storm sewer system, as well as take enforcement action as necessary. The permittee shall immediately report to DEP illicit discharges that would endanger users downstream from the discharge, or would otherwise result in pollution or create a danger of pollution or would damage property, in accordance with Part A III.D.4 of this permit.

- (1) 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 issuance of this permit....
- (4) Each time an outfall is screened, the permittee shall record outfall observations, regardless of the presence of dry weather flow. All outfall inspections shall be documented on the MS4 Outfall Field Screening Report form (3800-FM-BCW0521), or equivalent. The report must be signed by the inspector and be maintained by the permittee in accordance with Part A III.B of this General Permit....
- (7) Permittees must ensure that outfalls are properly maintained in accordance with Part C I.B.6.b of this Permit.”

Observation 4: The Borough’s 2022-2023 Annual Report (refer to Appendix C, Exhibit 8) stated 100% of the MS4’s outfalls were dry-weather screened in the last five (5) years, but when asked during the virtual opening conference how the MS4 determines dry-weather flow, the Borough representatives stated, “good question.” The EPA Inspection Team requested but did not receive any dry-weather screening records.

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) IN NEW DEVELOPMENT AND REDEVELOPMENT (POST CONSTRUCTION)

SESI performs post-construction stormwater management inspections. Newly constructed PCSM BMPs require a passed inspection prior to the Borough’s release of a developer’s letter of credit. Additionally, the Lebanon County Conservation District conducts their own inspections for termination of construction permits. The Borough stated that privately-owned/operated BMP responsibilities transfer to subsequent owners per standard stormwater agreements. When the Borough finds actual or potential BMP issues during their inspection, they perform an inspection follow up.

The Borough uses the *Cornwall Borough Stormwater Management Ordinance* (dated 9/12/2022) as their legal mechanism for PCSM (refer to Appendix C, Exhibit 4). Section 901 provides the Borough access to privately-owned/operated BMPs. Section 903 provides the Borough enforcement abilities. Section 301.H.3 of the ordinance encourages the use of low impact development to the maximum extent possible.

The Borough provided an inventory of the BMPs owned/operated by the Borough or by private entities (refer to Appendix C, Exhibit 6).

Permit Part C.I.B.5.c states, “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, including projects less than one acre that are part of a larger common plan of development or sale.

An inventory of PCSM BMPs shall be developed by new permittees by the end of the first year of Permit coverage and shall be continually updated during the term of coverage under the

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 Permit. The permittee must track the following information in its PCSM BMP inventory:

- 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., latitude and longitude, with street address).
- Information (e.g., name, address, phone number(s)) for BMP owners and entities responsible for BMP O&M, if different from BMP owners.
- 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 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 5: The inventories of Borough-owned/operated PCSM BMPs provided by the Borough did not include all Permit-required components (refer to Appendix C, Exhibit 6). Specifically, the inventories did not show the following:

- The exact location of the PCSM BMP. Only addresses of BMPs are listed in the inventory, no latitudes nor longitudes.
- 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 to address compliance with O&M requirements.

Observation 6: The Borough did not provide the EPA Inspection Team with as-builts or design plans for all visited BMPs, as requested by the EPA Inspection Team. Therefore, the EPA Inspection Team could not verify if the Borough maintains all BMPs as designed.

Observation 7: The Borough’s inventory of PCSM BMPs reported the most recent “Date of Last Inspection” as 6/9/2017 (refer to Appendix C, Exhibit 6). It was unclear when the inventory of PCSM BMPs was last evaluated to determine if updates were necessary.

Observation 8: The EPA Inspection Team observed vegetation overgrown from BMP #24’s headwall at the Tice Lane inlet. The vegetation grew over the headwall and hung down, covering the inlet piping’s opening (refer to Appendix B, Photograph 43). The Borough did not ensure adequate O&M of BMP #24. The Borough planned to talk to the BMP owner about maintenance of the vegetation to prevent blockage of the inlet piping.

Observation 9: At the time of the inspection, the EPA Inspection Team observed at the detention pond at BMP #38 that the outlet structure had grass clippings around it; a sinkhole was also present in the basin (refer to Appendix B, Photographs 1 through 7). The Borough did not ensure adequate O&M of BMP #38.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (PPGH)

The Borough developed an O&M Plan for the Borough's PPGH program (refer to Appendix C, Exhibit 9). The O&M Plan includes annual PPGH staff training provided by SESI. The Borough's employee training program states that they provide specific stormwater training to personnel who are directly involved in activities that may impact stormwater quality or that may generate or manage non-stormwater discharges. Borough representatives stated that staff learn on the job and that there are no written procedures. The Borough's DPW implements the Borough's PPGH program. By conducting annual inspections and cleanings, along with work for storm preparation and cleanup as needed, system maintenance occurs daily.

Facilities within the Borough include the DPW facility and yard, police station, three parks, and two (2) lots of vacant land. The DPW has two (2) garages, a salt storage shed with two (2) bays containing a combined total of approximately 300 tons of salt, an approximately 1,000-gallon double-walled above ground storage tank with a fueling pump, and assorted materials stockpiles.

Borough representatives stated all vehicles and equipment are maintained and stored inside their garages. Maintenance includes vehicle washing, oil and filter changes, leak repairs, welding, damaged part replacements, and sometimes brush painting. Larger maintenance needs are contracted out and performed offsite. Borough representatives stated there is a designated area outside for vehicle washing. The Police Department sometimes gets minor maintenance, not including washing, performed on their vehicles at the DPW's maintenance garage. Occasionally office vehicles and the Borough's water truck are stored outside.

A contractor disposes of the Borough's used vehicle liquids once or twice per year, or as needed. A contractor is also used to recycle oil filters. The Borough stores pesticides, a vehicle maintenance degreaser/cleaning agent, and dechlorination tabs within a storage room inside the Borough's maintenance garage.

The Borough does not have street sweeping equipment and the work is contracted out. Street sweepings occur annually in late spring and sweeping debris is added to the Borough's stockpile to be used for road shoulder and parking areas as fill-in; pollutants are picked out of the sweepings when added to the stockpile.

At the time of the inspection, the Borough provided the EPA Inspection Team with a list of SOPs for the DPW facility and yard (refer to Appendix C, Exhibit 10).

The Lebanon County Clean Water Association provides a broader MS4 program training that includes PCSM; Borough employees participate in this program.

Permit Part C.I.B.6.a requires the Permittee to, “Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee. Activities may include the following: street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn/grounds care; general storm sewer system inspections and maintenance/repairs; park and open space maintenance; municipal building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures. Facilities can include streets; roads; highways; parking lots and other large, paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances (open and closed pipe); riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).

- (1) New permittees shall create an inventory of all operations and land uses that may contribute to pollution in stormwater runoff within areas of operations that discharge to the regulated small MS4 by the end of the first year of permit coverage, and review and update the inventory annually thereafter.
- (2) All permittees must review and update the inventory each year of permit coverage, as necessary.”

Observation 10: At the time of the inspection, the Borough’s list of Borough-owned/operated facilities that have the potential for generating pollution in stormwater runoff was dated December 2017 (refer to Appendix C, Exhibit 11). It was unclear when the Borough’s list of Borough-owned/operated facilities that have the potential for generating pollution in stormwater runoff was last evaluated to determine whether updates were necessary.

Permit Part C.I.B.6.b requires the Permittee to, “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, and include the following:

- Management practices, policies, and procedures shall be developed and implemented to reduce or prevent the discharge of pollutants to the regulated small MS4s. The

permittee shall 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 the regulated small MS4s.
- 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. Controls for solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety must be consistent with the BMPs for existing salt storage and distribution sites contained in the PAG-03 NPDES Permit for Stormwater Discharges Associated with Industrial Activity.
- Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris...

(2) All permittees must review and update the written O&M program each year of permit coverage, as necessary.”

Observation 11: The Borough did not properly implement O&M procedures at their DPW. At the time of the inspection, the EPA Inspection Team made the following field observations at the DPW (refer to [Appendix B, Photographs 8 through 41](#)):

- Three (3) approximately 275-gallon above ground storage tanks outside of the maintenance garage with no secondary containment (refer to [Appendix B, Photographs 15 through 17](#)).
- Floor drains located in the vehicle storage building drained outside of the building to a grassed area (refer to [Appendix B, Photographs 21 and 22](#)).
- Vehicle washing occurs outside the maintenance garage in a gravel parking area without containment. The Borough stated that wash water runs off into the gravel, which is eventually dug up, stored in the Borough’s 2a aggregate pile, and use for fill (refer to [Appendix B, Photographs 17, 18, 32, and 33](#)).
- The EPA Inspection Team observed a sheen and staining on the paved area in front of the salt shed (refer to [Appendix B, Photographs 23 and 25](#)).

Observation 12: The Borough maintains a written operation and maintenance (O&M) program; revised December 2017 (refer to [Appendix C, Exhibit 9](#)). It was unclear when the written O&M program was last evaluated to determine whether updates were necessary.

POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS (PRP)

SESI developed the Borough’s Pollutant Reduction Plan (PRP), dated June 14, 2017, revised June 4, 2019, and submitted to PADEP in June 2023. The PRP covers total nitrogen (TN), total phosphorus (TP), and total suspended solids (TSS) (refer to [Appendix C, Exhibit 2](#)); PADEP approved the Borough’s PRP on June 23, 2023 (refer to [Appendix A](#)).

The Borough's goal is a reduction of 36,000 pounds of TSS per year to be achieved by June 2028. The Borough has three projects to reach this goal: the Goosetown Project and the Snitz Creek 2 and 3 Stream Restoration Projects. The Borough completed the Goosetown Project in Fall 2023 but anticipate additional work to finalize the project (i.e., a failed seeding of the ground in the spring delaying completion until seeding is successfully completed). The Borough plans for Snitz Creek 2 and 3 Stream Restoration Projects to proceed concurrently, with a Snitz Creek 4 Project planned sometime later. The Borough anticipates the Snitz Creek 2 and 3 projects to reduce TSS by approximately 130,000 pounds annually and to complete the project in the 2025-2026 timeframe. At the time of the inspection, the Snitz Creek 2 and 3 projects were in the bidding process for contractors and the Borough claimed to have accomplished a reduction of 5,000 pounds of TSS per year with their Goosetown Project.

FIELD CONDITIONS

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE) (FIELD INSPECTIONS)

Outfall from BMP #24 (Privately-owned/operated BMP)

Address/Location: 40.285409°, -76.426643°, between 159 and 167 Tice Lane, Lebanon, PA 17042

Relevant Minimum Control Measure (MCM): IDDE

Entry Time: 10:07 AM (EDT) August 8, 2024

Exit Time: 10:22 AM (EDT)

Description: The EPA Inspection Team observed an outfall pipe from the privately-owned/operated detention basin at BMP #24 (refer to [Appendix B, Photographs 42 through 47](#)). The Borough did not provide the EPA Inspection Team with the plans for the basin.

Conditions: The EPA Inspection Team observed the following conditions at BMP #24:

- 1) The EPA Inspection Team observed the outlet to be unblocked (refer to [Appendix B, Photograph 47](#)).
- 2) Borough representatives stated that the outfall from the basin led to an unnamed tributary of Snitz Creek.
- 3) The EPA Inspection Team could not find the outfall on the Borough provided map (refer to [Appendix C, Exhibit 1](#)).

MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) IN NEW DEVELOPMENT AND REDEVELOPMENT (FIELD INSPECTIONS)

BMP #21 (Privately-owned/operated BMP)

Address/Location: 131 North Cornwall Road, Lebanon, PA 17042

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 9:55 AM (EDT) August 8, 2024

Exit Time: 10:04 AM (EDT)

Description: The EPA Inspection team observed a privately-owned/operated BMP within the fenced property line of a residential backyard. According to the Borough's inventory, the BMP is a detention basin with an infiltration bed. The Borough provided the EPA Inspection Team with the plans for the basin (refer to Appendix D, Design Plan 1). The EPA Inspection Team observed that the site followed the plans.

Conditions: The EPA Inspection Team observed the following conditions at BMP #21:

- 1) The EPA Inspection Team observed the basin and overflow structure. The area was well maintained. There was no buildup of debris nor sediment and no blockages to the overflow structure (refer to Appendix B, Photographs 48 and 49).
- 2) The EPA Inspection Team observed the BMP's outfall just beyond the fence line. The Borough said the outfall goes to an unnamed tributary of Snitz Creek.
- 3) The BMP owner/operator came out during the inspection. The EPA Inspection Team briefly spoke with the owner/operator and the owner stated flooding occurs rarely.

BMP #24 (Privately-owned/operated BMP)

Address/Location: Between 159 and 167 Tice Lane, Lebanon, PA 17042

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 10:07 AM (EDT) August 8, 2024

Exit Time: 10:22 AM (EDT)

Description: The EPA Inspection Team observed a privately-owned/operated BMP adjacent to the owner's home. The BMP is a detention basin. The Borough did not provide the EPA Inspection Team with the plans for the basin.

Conditions: The EPA Inspection Team observed the following conditions at BMP #24:

- 1) The EPA Inspection Team observed the basin, and the inflow and outflow structures of BMP #24 (refer to Appendix B, Photographs 42 through 46). The basin's grass was short, and structures were clear of debris and accumulated sediment. The headwall of the inlet to the basin had overgrown vegetation that hung over and blocked the view of the inlet's piping (refer to Observation 8).
- 2) The Borough stated that the outfall from the basin (refer to Appendix B, Photograph 47) led to an unnamed tributary of Snitz Creek.

BMP #38 (Privately-owned/operated BMP)

Address/Location: 2594 Cornwall Road, Cornwall, PA 17106

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 10:25 AM (EDT) August 8, 2024

Exit Time: 10:32 AM (EDT)

Description: The EPA Inspection Team observed a privately-owned/operated BMP in the northwest corner of land at the intersection of Spruce Street and Cornwall Road. The BMP is a detention basin. The Borough provided the EPA Inspection Team with the plans for the basin (refer to Appendix D, Design Plan 2).

Conditions: The EPA Inspection Team observed the following conditions at BMP #38:

- 1) A church parking lot stormwater inlet (refer to Appendix B, Photograph 1) connected to the BMP (refer to Appendix B, Photograph 2).
- 2) The EPA Inspection Team observed vegetative growth near the basin's inlet and outlet structures (refer to Appendix B, Photographs 3 through 5). At the time of the inspection, grass clippings were collected on the outlet's overflow structure (refer to Appendix B, Photographs 4 and 5). Refer to Observation 9 for more information.
- 3) The EPA Inspection Team observed a small sinkhole with vegetative growth (refer to Appendix B, Photograph 7).

BMP #34 (Privately-owned/operated BMP)

Address/Location: 1 Boyd Street, Cornwall, PA 17016; 40.274083 °, -76.410240 °

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 10:36 AM (EDT) August 8, 2024

Exit Time: 10:40 AM (EDT)

Description: The EPA Inspection Team observed a privately-owned/operated BMP. The BMP is an infiltration basin. The Borough provided the EPA Inspection Team with the plans for the basin (refer to Appendix D, Design Plan 3). The EPA Inspection Team observed that the site followed the plans.

Conditions: The EPA Inspection Team observed the following conditions at BMP #34:

- 1) The BMP contained vegetation (i.e., cattails) (refer to Appendix B, Photograph 50).
- 2) The BMP outlet into BMP #17 across a walkway (refer to Appendix B, Photograph 51).

BMP #17 (Privately-owned/operated BMP)

Address/Location: 1 Boyd Street, Cornwall, PA 17016; 40.274005°, -76.410273°

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 10:41 AM (EDT) August 8, 2024

Exit Time: 10:42 AM (EDT)

Description: The EPA Inspection Team observed a privately-owned/operated BMP. The BMP is an infiltration basin. The Borough provided the EPA Inspection Team with the plans for the basin (refer to Appendix D, Design Plan 3). The EPA Inspection Team observed that the site followed the plans.

Conditions: The EPA Inspection Team observed the following conditions at BMP #17:

- 1) The basin had vegetation (refer to Appendix B, Photographs 51 and 52).
- 2) The area surrounding the basin was well maintained (refer to Appendix B, Photograph 52).

BMP #33 (Privately-owned/operated BMP)

Address/Location: 1 Boyd Street, Cornwall, PA 17016; 40.273784°, -76.411669°

Relevant Minimum Control Measure (MCM): PCSM

Entry Time: 10:43 AM (EDT) August 8, 2024

Exit Time: 10:47 AM (EDT)

Description: The EPA Inspection Team observed a privately-owned/operated BMP. The BMP is a constructed wetland. The Borough provided the EPA Inspection Team with the plans for the constructed wetland (refer to Appendix D, Design Plan 3).

Conditions: The EPA Inspection Team observed the following conditions at BMP #33:

- 1) The EPA Inspection Team observed that the BMP was maintained and lush with vegetation; large cattails grew throughout (refer to Appendix B, Photographs 53 and 54). The EPA Inspection Team observed that the site followed the plans.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (FIELD INSPECTIONS)

Borough Public Works Department Facility Yard

Address/Location: 44 Rexmont Road, Lebanon, PA 17042

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 8:30 AM (EDT) August 8, 2024

Exit Time: 9:38 AM (EDT)

Description The Cornwall Borough DPW houses the Borough's offices, garages (i.e., a vehicle washing and maintenance garages), Borough vehicles, vehicle washing and fueling operations, salt storage, equipment storage, and materials storage (i.e., wood chippings, aggregates, compost). The Borough provided the EPA Inspection Team with the plans for the building's basin (refer to Appendix D, Design Plan 4).

Conditions: The EPA Inspection Team observed the following conditions at the Borough's DPW facility:

- 1) The EPA Inspection Team observed the Borough's small equipment storage garage (refer to Appendix B, Photograph 8). There were no floor drains in the garage (refer to Appendix B, Photograph 9). Borough representatives stated this garage is for storage only, no maintenance occurs in the garage, and that a contractor delivers new and

removes old batteries here. The Borough takes recyclable batteries to the Battery Warehouse Company for disposal.

- 2) The EPA Inspection Team observed a leaf box outside the northwest corner of the Borough's small equipment storage garage (refer to Appendix B, Photograph 10). The Borough stated the leaf box is loaded onto a Borough vehicle and used for seasonal leaf pick up from residential areas.
- 3) The EPA Inspection Team observed the closest stormwater inlet to the DPW located at the corner of Burd Coleman Road and Rexmont Road, approximately 330 feet downgradient from the DPW's equipment storage garage.
- 4) Inside the Borough's maintenance garage, with a small office, the Borough showed where vehicle maintenance occurs (refer to Appendix B, Photograph 11). Borough representatives stated that they perform oil changes and other small tasks, subcontracting offsite for larger needs. The EPA Inspection Team observed floor drains that the Borough stated connect to an annually cleaned grease trap that then connects to the Borough's sanitary system. The EPA Inspection Team did not receive records for grease trap cleanouts. Each bay had a floor drain (refer to Appendix B, Photographs 11 and 12). The EPA Inspection Team observed staining on the garage floor.
- 5) Within the maintenance garage, the EPA Inspection Team observed the following liquids:
 - a. Hydraulic oil in a tank on wooden blocks, and a 55-gallon barrel of used oil located on the floor (refer to Appendix B, Photograph 13).
 - b. 5-gallon buckets of cold patch near the northwestern most garage door, one on the floor, and three with lids.
 - c. An "oil room" with small containers of various fluids (refer to Appendix B, Photograph 14).
- 6) When asked by the EPA Inspection Team if there were any pesticides or fertilizers, the Borough representatives said "no."
- 7) The EPA Inspection Team observed three white tanks the Borough representatives said held heating oil and diesel fuel (refer to Appendix B, Photographs 15 through 17). Each tank was approximately 275 gallons and single-walled without secondary containment (refer to Observation 11).
- 8) The EPA Inspection Team observed a large truck on a paved driveway behind the equipment storage garage (refer to Appendix B, Photographs 17 and 18). The driveway ended and became a gravel road, heading in a southeast direction. The Borough representatives stated that this was the designated outdoor vehicle wash area and when the gravel needed replacing, they dug it up and added the used gravel to their 2A aggregate pile. The EPA Inspection Team observed no containment for the wash area. The uncontained wash water would follow the downward gradient toward the stormwater inlet approximately 312 feet northwest at the intersection of Rexmont Road and Burd Coleman Road (refer to Observation 11).
- 9) The EPA Inspection Team observed a larger vehicle storage garage (refer to Appendix B, Photograph 19) containing dump trucks and other heavier vehicles, as well as snow removal equipment (refer to Appendix B, Photographs 20 and 21). Floor drains were

present in each bay of the vehicle storage garage near staining and below vehicles (refer to [Appendix B, Photograph 21](#)). These floor drains convey fluids directly outside of the garage to a grassy area (refer to [Observation 11](#) and [Appendix B, Photograph 22](#)). The EPA Inspection team observed a spill kit in the garage.

- 10) The salt storage shed was a covered, three-sided storage area, with two bays (refer to [Appendix B, Photographs 23 and 24](#)). The EPA Inspection Team observed a petroleum stain at the shed's opening (refer to [Observation 11](#) and [Appendix B, Photograph 25](#)).
- 11) The EPA Inspection Team observed a 2,000-gallon double-walled diesel fuel tank approximately 60 feet northeast of the salt storage shed (refer to [Appendix B, Photograph 26](#)).
- 12) The EPA Inspection Team observed an outdoor storage area the Borough stored reusable materials (e.g., empty 55-gallon barrels to use as trashcans, an old tire filled with concrete as a makeshift stop sign, and some assorted metals for reuse or disposal) (refer to [Appendix B, Photograph 27](#)). There was additional uncovered, uncontained storage throughout the yard (e.g., equipment attachments and flexible black piping; and old, empty totes and jersey walls) (refer to [Appendix B, Photographs 28 and 29](#), respectively).
- 13) The EPA Inspection Team observed asphalt millings (refer to [Appendix B, Photograph 30](#)), cold patch (refer to [Appendix B, Photograph 31](#)) and aggregate stone piles were stored around the northwestern half of the DPW's yard (refer to [Appendix B, Photographs 32 through 33](#)).
- 14) Piles of topsoil and gravel were stored without cover or containment (refer to [Appendix B, Photograph 34](#)).
- 15) The Borough stored wood chippings, mulch, and compost in three-sided concrete bins made of jersey walls (refer to [Appendix B, Photographs 35 through 37](#)). The EPA Inspection Team observed spillage out of the northwest corner of the compost bin (refer to [Appendix B, Photograph 36](#)).
- 16) The EPA Inspection Team observed that the DPW had roof downspout connections. The connections let out into the grass.
- 17) The DPW had a Borough-owned/operated detention basin running the length of the property of their DPW, along Rexmont Road (refer to [Appendix B, Photographs 38 through 41](#)). The BMP was well maintained.

Miner's Village – Borough-owned/operated Park

Address/Location: 40.265973°, -76.395430°

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 10:55 AM (EDT) August 8, 2024

Exit Time: 11:04 AM (EDT)

Description: The park houses a skating rink, a baseball field, and a parking area for community use. The Borough provided the EPA Inspection Team with the plans for the park (refer to [Appendix D, Design Plan 5](#)).

Conditions: The EPA Inspection Team observed the following conditions at the park:

- 1) Borough representatives stated their maintenance of the park was specific to mowing the grass and adding sand as needed to the baseball field (refer to [Appendix B, Photographs 55 and 56](#)).
- 2) The parking lot housed a portable toilet (refer to [Appendix B, Photograph 57](#)). Borough representatives stated a contractor conducts weekly maintenance on the portable toilet. Additionally, trash and recycling are also contracted out and are maintained by the Greater Lebanon Refuse Authority.
- 3) Stormwater inlets were located northeast of the skating rink and along the southeast border of the parking lot (refer to [Appendix B, Photograph 57](#)).

POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS (PRP)

Goosetown Restoration Project Site

Address/Location: 40.274269°, -76.401221°; 40.275017°, -76.401560°; 40.275916°, -76.40024°; and 40.273788°, -76.398812°

Relevant Minimum Control Measure (MCM): Pollution Control Measure for PRP

Entry Time: 11:10 AM (EDT) August 8, 2024

Exit Time: 11:36 AM (EDT)

Description: The EPA Inspection Team observed the Borough's site for the Goosetown Project. The project was completed Fall 2023 but has experienced some seeding challenges and the Borough is keeping the contract for the work open until the seeding is successful and resolved. The project is between Anthracite Road, Palmer Street, and Walker Street, along Rexmont Road. The Borough provided the EPA Inspection Team with project plans and loading calculations (refer to [Appendix D, Design Plans 6 and 7](#)).

Conditions: The EPA Inspection Team observed the following conditions at the proposed site for the Goosetown Project site:

- 1) The EPA Inspection Team observed that the project site was a restoration of vegetative buffer with detention areas with berms and riprap areas to filter crossing stormwater. A tree line was between the basins and alongside the riparian buffer, along with young trees planted by the Borough (refer to [Appendix B, Photograph 58](#)). The Borough Engineer designed the site to slow the release of water to help reduce water quality issues.
- 2) At the first detention area, the EPA Inspection Team observed an inlet to the area that let out to a level spreader for the basin, then to three (3) riprap detention areas for filtration and catching debris (refer to [Appendix B, Photographs 59 through 61](#)). From here, Borough representatives said water would flow to an unnamed tributary of Snitz Creek. This detention area was completed in Fall 2023.

- 3) On route to the second detention area, the EPA Inspection Team observed two piles of old grass clippings that Borough representatives stated were likely from a resident (refer to [Appendix B, Photograph 62](#)).
- 4) At the second detention area, the EPA Inspection Team observed a vegetated area under a large tree (refer to [Appendix B, Photograph 63](#)). The Borough said the design is more like a basin and relies on infiltration. The Borough had not yet closed out the project due to issues with seeding at this location.
- 5) At the third detention area, the EPA Inspection Team observed another detention area, similar to the first (i.e., an inlet to the area that led to three riprap detention areas), but without a level spreader (refer to [Appendix B, Photograph 64](#)).
- 6) At the fourth detention area, the EPA Inspection Team observed another detention area similar to the first (i.e., an inlet leading to riprap detention areas) with a filter sock and designed grasses. This detention area was adjacent to the unnamed tributary to Snitz Creek.

Proposed Site for the Snitz Creek 2 Stream Restoration Project

Address/Location: 40.281340°, -76.408886°

Relevant Minimum Control Measure (MCM): PRP

Entry Time: 9:43 AM (EDT) August 8, 2024

Exit Time: 9:51 AM (EDT)

Description: According to Borough representatives, this is the starting point for the Borough's planned site for approximately 4,000-5,000 feet of restoration, which should fulfill the Borough's Permit required reduction needs for five to ten years. The project is being done in collaboration with Trout Unlimited and Clear Creeks Consulting. The Borough anticipates approximately 2,000 feet of the stream and a large wetland area to be produced by the project from what is currently a dry field. The Borough provided the EPA Inspection Team with project plans and estimated reduction calculations (refer to [Appendix D, Design Plans 8 and 9](#)).

Conditions: The EPA Inspection Team observed the following conditions at the proposed site for the Snitz 2 stream restoration:

- 1) The project will occur between residential and farming areas. The EPA Inspection Team observed that the proposed stream restoration area contained heavy vegetation and an eroded channel (refer to [Appendix B, Photographs 66 and 67](#)).

CLOSING CONFERENCE

After the site walk, the EPA Inspection Team met with the Borough representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the Borough representatives. The EPA Inspection Team reiterated to the Borough representatives that all preliminary observations discussed were not compliance determinations. All preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report

that were not identified at the time of the closing conference based upon EPA review of additional materials following the inspection.

The inspection concluded at approximately 11:50 AM (EDT).