



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): 04/21/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: Camp Hill Borough MS4
Permittee(s): Camp Hill Borough
Site/Facility Operator: Camp Hill Borough
Site/Facility Address: 2145 Walnut Street
Camp Hill, PA 17011
Latitude: 40.241100 **Longitude:** -76.921570
County/Parish: Cumberland
General Permit #: PAG013
Site Specific Permit #: PAG133549
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN082A

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

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**Supervisor
Signature/Date**

Jessica Duffy, Acting Section Chief
NPDES Enforcement Section, (3ED32)

Date

Unique Project#: 3E22WN082A

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List of Attachments

Attachment A:	Photo Log
Attachment B:	Permit
Attachment C:	2020 Annual Report
Attachment D:	Correspondence with the Borough
Attachment E:	PCSWMBMP Plans

I. Introduction

On April 21, 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 Camp Hill Public Works Facility at 422 S. 24th Street, Camp Hill, PA. At the facility, the EPA Inspection Team met with Lester Lanman (Camp Hill, Director of Public Works). 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 the borough’s Annual Reports (MCM3). 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 a facility visit of the one of the borough’s municipal yards. 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 422 S. 24th Street at approximately 1:30 PM 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 three 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 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Carlisle Water Plant, PA US USC00361920	04/16/2022	0.0
Carlisle Water Plant, PA US USC00361920	04/17/2022	0.0
Carlisle Water Plant, PA US USC00361920	04/18/2022	0.0
Carlisle Water Plant, PA US USC00361920	04/19/2022	0.87
Carlisle Water Plant, PA US USC00361920	04/20/2022	0.0
Carlisle Water Plant, PA US USC00361920	04/21/2022	0.0

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

II. Facility Activity

Camp Hill Borough is in Cumberland County Pennsylvania. The borough is bordered to the east by the Borough of Lemoyne, to the west by Hampden Township, to the south by Lower Allen Township and the north by Hampden Township. The borough has an area of 2.1 square miles and a population of approximately 8,000 residents. According to the borough's 2021 Operations and Maintenance plan there are eight borough facilities including the Public Works Facility which was inspected.

III. Observations

Prior to the inspection the EPA Inspection Team chose and requested the 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 conducted site visits of the Public Works Facility and the three 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..."

Page 13 of the 2021 Camp Hill Operations and Maintenance Manual informs the borough that "When bulk materials are stored outside, they are stored in areas with berms or curbs to prevent stormwater runoff."

Observation #1:

During the inspection of the Public Works Facility, the EPA Inspection Team observed several piles of sand, gravel and road materials in the bulk storage area with no visible berms or curbing. There appeared to be some migration of sand within the bulk storage area but did not appear to migrate from the facility (Photograph DSCN3300 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 borough's 2021 Annual Report dry weather screenings were not conducted in 2021. The 2020 Annual Reports (Attachment C) notes that 10 of the borough's outfalls were inspected for dry weather flows. In the review of the 2020 dry weather screening forms the EPA Inspection Team noted that Outfalls #5 and 8 were identified as having no flow but photographs taken during the screening appear to show a flow from these outfalls. The Borough Representatives agreed that it appeared these photos show flows. The Borough Engineer noted that when the inspections took place there was rainfall within 72-hours of the inspection but that the flows observed were clear and lacked odor or oil. The borough notified EPA that it intends to re-inspect these two outfalls.

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 #3:

The plans for the PCSWMBMPs were requested and reviewed by the inspection team prior to the inspection. It appeared during the inspections 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 Willow Park (Photograph DSCN3310 of the Photo Log) had some erosional marks on the bank that were recently stabilized by the borough. The inflow and outflow structures of the BMP appeared to be unobstructed.

The BMP at Schafer Park (Photograph DSCN3314 of the Photo Log) appeared to have some signs of erosion behind an inflow pipe. The inflow and outflow structures of the BMP appeared to be unobstructed.

The BMP at Beverly Park (Photograph DSCN3319 of the Photo Log) appeared well vegetated, and the inflow and outflow structures appeared un-obstructed.

IV. Records Review

The EPA Inspection Team reviewed the 2020 and 2021 Annual Reports for Camp Hill Borough, the Operations and Maintenance Plan for the borough, the General Permit and PCSWMBMP plans.

V. Closing Conference

At the conclusion of the onsite 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 3:30 PM (EDT).