



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 12/12/2023 to 12/14/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Separate Storm Sewer System (MS4)
Site/Facility Name: City of Carbondale MS4
Permittee(s): City of Carbondale (Expired)
Site/Facility Operator: City of Carbondale
Site/Facility Address: 1 North Main Street
Carbondale, PA 18407
Latitude: 41°34'21"N **Longitude:** 75°30'11"W
County/Parish: Lackawanna
Permit Number: PAI132246 (Expired)
NAICS Code: 921190 **SIC:** 9199
Unique Project #: ECAD-5389

Site/Facility Representative(s): **Point of Contact**
Michelle Bannon (Mayor of the City of Carbondale) ☒
Phone: (570) 282-4633 Email: mbannon@icontech.com
Tony Grizzanti/Dave Lamereaux (KBA Engineering) ☐
Phone: (570) 876-5744 Email: grizzanti@kbapc.net/lamereaux@kbapc.net

EPA Inspectors:
Edward Simas, 3ED32 (Lead Inspector)
Phone: (215) 814-2120 Email: Simas.Edward@epa.gov
Chuck Schadel, 3ED32 (Secondary Inspector)
Phone: (215) 814-5761 Email: Schadel.Chuck@epa.gov

State/Local Inspectors:
Paul Grella
Phone: (590) 241-4249 Email: pgrella@pa.gov

Report Preparer	Edward Simas (3ED32)	Date
Signature/Date	NPDES Section 1	

Supervisor	Mark Zolandz (3ED32)	Date
Signature/Date	NPDES Section 1 Chief	

Unique Project#: ECAD-5389

Table of Contents

<u>Section</u>		<u>Page</u>
I	Introduction.....	3
A	Inspection Opening Conference.....	3
B	Weather and Precipitation Conditions.....	4
C	Summary of the Facility.....	4
II	Inspection Activity.....	5
III	Observations.....	5
IV	Records Review.....	12
V	Closing Conference.....	12
VI	List of Attachments.....	14

I. Introduction

From December 12, 2023 through December 14, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region 3 (hereinafter, “EPA Inspection Team”) conducted a Municipal Separate Storm Sewer System (“MS4”) inspection of the City of Carbondale (hereinafter, “the City”) MS4 (hereinafter, the “Facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (“CWA”) and applicable state and Federal regulations, and to verify discharge of stormwater through the City’s MS4 system without an effective National Pollutant Discharge Elimination System (“NPDES”) MS4 Permit. At the time of the inspection, the City did not have an active NPDES Permit. The Facility’s NPDES Permit No. PAI132246 was issued by the Pennsylvania Department of Environmental Protection (“PADEP”) on July 1st, 2015, and expired June 30th, 2020.

A. Inspection Opening Conference

The EPA Inspection Team arrived at Carbondale City Hall at est. 8:30AM on December 13, 2023, for the opening conference of the inspection. Inspectors met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Edward Simas	Lead Inspector	(215) 814 - 2120	Simas.Edward@epa.gov
Chuck Schadel	Secondary Inspector	(215) 344 - 1560	Schadel.Chuck@epa.gov
Site/Facility Representatives			
Michele Bannon	City of Carbondale	(570) 282 - 4633	mbannon@icontech.com
Frank Galko	City of Carbondale	Not Provided	frankgalko@gmail.com
Tony Grizzanti	KBA Engineering	(570) 876 - 5744	grizzanti@kbapc.net
David Lamereaux	KBA Engineering	(570) 876 - 5744	lamereaux@kbapc.net
State or County Representatives			
Paul Grella	PADEP	(570) 241-4249	pgrella@pa.gov
Colin Hill	PADEP	(570) 218-2206	colhill@pa.gov

Edward Simas and Chuck Schadel displayed their credentials to representatives of the City of Carbondale at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the expired Permit is provided in Attachment 4. The EPA Inspection Team informed city representatives that any information that the Facility 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.

B. Weather and Precipitation Conditions

During the inspection, weather was sunny and cool. National Oceanic and Atmospheric Administration (“NOAA”) National Weather Service precipitation data for the dates 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
Richmondale 0.1 NE, PA	12/07/2023	T
Richmondale 0.1 NE, PA	12/08/2023	0.8
Richmondale 0.1 NE, PA	12/09/2023	0.00
Richmondale 0.1 NE, PA	12/10/2023	0.00
Richmondale 0.1 NE, PA	12/11/2023	4.0
Richmondale 0.1 NE, PA	12/12/2023	0.00
Richmondale 0.1 NE, PA	12/13/2023	0.00
Richmondale 0.1 NE, PA	12/14/2023	0.00

“T” = trace value was recorded

C. Summary of the Municipality

According to the United States Census Bureau, the City of Carbondale has a total area of 3.24 square miles (2,073.6 acres). The City is located in the northeast region of Pennsylvania in Lackawanna County. According to the City’s most recent Chesapeake Bay Pollutant Reduction Plan (Attachment 11), there are about 4.4 stream miles within the city comprised of the Lackawanna River (2.66mi), Fallbrook Creek (1.15mi), and Racket Brook Creek (0.59mi). The smaller streams discharge into the Lackawanna River which then flows into the Susquehanna River and then to the Chesapeake Bay. The City has a total of 66 existing outfalls identified in the “Carbondale MS4 Mapping Update Submitted to EPA 1-7-21” (Attachment 5) and noted in the City’s 2023 Annual Report (Attachment 6). The City 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 City’s waterways through stormwater quality management. The City’s MS4 NPDES Permit (Attachment 4) has been expired since June 30th, 2020. The Pennsylvania Department of Environmental Protection (PADEP) has recently sent a reminder email dated November 22nd, 2023 certifying permit expiration (Attachment 10). The City continues to discharge without permit coverage under expired NPDES MS4 Permit No. PAI132246 (Attachment 4).

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

II. Inspection Activity

During the inspection, the EPA Inspection Team observed: outfalls in three streams within the City's boundaries (Lackawanna, Racket Brook, and Fall Brook), potential illicit discharge/unknown connections into the streams, and new development within the City's boundaries. Furthermore, the EPA Inspection Team observed best management practices ("BMP's") and housekeeping within City owned facilities. The inspection observations were made pursuant to state and Federal regulations, including the Clean Water Act ("CWA"). The City's Permit (Attachment 4) expired on June 30th, 2020.

The EPA Inspection Team broke the site visit into three separate dates. The EPA Inspection Team and PADEP arrived on the afternoon of December 12, 2023, for an internal field inspection of new development, outfalls, and potential illicit connections within the City. On December 13, 2023, EPA met with the City for an opening conference, closing conference, and toured City owned properties (Attachment 7). On December 14, 2023, EPA finished touring City-owned properties. The observations from each day of the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Chuck Schadel, and are provided in Attachments 1 – 3.

III. Observations

a. Historic Permit Details

Observation 1: During periods of precipitation, the City of Carbondale is discharging the resulting stormwater runoff without an effective NPDES permit. The previous NPDES permit (PAI132246) expired on June 30th, 2020. The PADEP did not renew the City's previous MS4 permit due to the submittal of an incomplete and deficient renewal application by the City. PADEP has requested additional information in order for the application to be approved, but the City has not provided the requested information. (Attachments 8-10).

Although the City has continued to provide annual reports to the PADEP, PADEP has issued deficiency letters to the City for the past three years, notifying the City that it is discharging stormwater runoff under an expired permit. The deficiency letters also identify the missing permit application information necessary for PADEP to process the NPDES permit renewal application (Attachments 8-10).

The most recent communication from PADEP to the City is a reminder of the permit expiration (Attachment 10) and two deficiency letters from the 2020 – 2022 annual report reviews (Attachments 8 – 9). The City has also submitted a 2023 annual report (Attachment 6).

b. General Facility operations observed on December 12, 2023

The EPA Inspection Team, along with PADEP inspectors, conducted a reconnaissance of the MS4-related components of City. This reconnaissance included documenting the Lackawanna River outfalls, new development within the City, as well as potential illicit connections to the Lackawanna River. The EPA Inspection Team also observed BMPs within newly developed properties, and sources that can contribute pollution to City street inlets. Observations for this date are described below.

Observation #2: The EPA Inspection Team reviewed citizen complaints in advance of the MS4 inspection. Initially, there were citizen concerns that a possible sewage connection may have been improperly connected to the stormwater conveyance drains. Sewage complaints occurred within the dates of 2019 – 2021 alleging sewage backups into homes and a sewage smell in a stormwater inlet. The EPA Inspection Team inspected the stormwater inlets in the area of South Main Street, which is the location for the complaint (Attachment 1, Photos 2023-12-12--13.11.56_DSCN4025). The EPA inspection Team did not smell sewage in the area, however sediment runoff from dirt/gravel driveways in the area was observed flowing downhill from 10th Avenue to Main Street (Attachment 1, Photo 2023-12-12--13.17.17_DSCN4026 through 2023-12-12--13.17.31_DSCN4027). Due to the topography of this area, this sediment would flow towards the South Main Street stormwater inlet (Attachment 1, Photo 2023-12-12--13.11.56_DSCN4025).

When this complaint was discussed with the City, the Mayor explained that the sewage backups were due to an unlicensed contractor that did not properly connect the residential sewage lines, and explained that this had been fixed on a few separate occasions.

Observation #3: The EPA inspection Team witnessed the flows discharging from City outfalls along the Lackawanna River outfalls (Attachment 1, Photos 2023-12-12--13.29.52_DSCN4028, 2023-12-12--13.52.30_DSCN4031 through 2023-12-12--13.57.37_DSCN4034, 2023-12-12--13.58.11_DSCN4036). The EPA Inspection Team also observed underground pipes that discharge to the Lackawanna River (Attachment 1, 12-12--13.33.36_DSCN4029 through 2023-12-12--13.52.31_DSCN4031, 2023-12-12--13.57.45_DSCN4035, 2023-12-12--13.59.08_DSCN4037, 2023-12-12--15.00.03_DSCN4057). It is unclear which of these are part of the MS4 and if any of these may be illicit connections to the river.

Observation #4: The EPA inspection Team observed several dirt/gravel lots around the City that appear to contribute to sediment accumulation within street stormwater inlets. For example, the EPA Inspection Team noticed sediment running off onto River Street. There appeared to be multiple lots in the area with soil surface that were not stabilized. (Attachment 1, 2023-12-12--14.17.32_DSCN4043, 2023-12-12--14.17.37_DSCN4044, 2023-12-12--14.17.41_DSCN4045, 2023-12-12--14.19.52_DSCN4048, 2023-12-12--14.19.58_DSCN4049). The EPA Inspection Team observed that the nearby River Street stormwater inlet drains on the west and east sides were filled with some sediment at the time of inspection (Attachment 1, 2023-12-12--14.18.21_DSCN4047, 2023-12-12--14.18.17_DSCN4046, 2023-12-12--14.21.13_DSCN4050, 2023-12-12--14.21.18_DSCN4051).

Observation #5: The EPA Inspection Team observed what appeared to be recent land developments that may be subject to MCM #5 (Post-Construction stormwater management in New and Re-Development Activities). 40 CFR Part 122.34(b)(5)(i) requires NPDES permits issued to small MS4s to ensure that controls are in place that would prevent or minimize water quality impacts. The EPA Inspection Team did observe BMPs at new land development (within the past 10 years) at: Hotel Anthracite, Geisinger Primary Care, and 71 River St. At Hotel Anthracite, the EPA Inspection Team observed a rock garden which absorbs water that flows from a downspout sourcing from the parking garage (Attachment 1, Photo 2023-12-12--14.35.03_DSCN4054 through 2023-12-12--14.34.57_DSCN4053). A hotel representative-stated that the City was not involved in this specific stormwater project. The EPA Inspection Team next inspected Geisinger Primary Care (Attachment 1, Photo 2023-12-12--14.06.46_DSCN4038 through 2023-12-12--14.06.58_DSCN4039), which had rocks along the perimeter of the property and a rock garden on the east corner of the Facility. Lastly, the EPA Inspection Team inspected an office building at 71 River Street (Attachment 1, Photo 2023-12-12--14.12.13_DSCN4041 through 2023-12-12--14.12.17_DSCN4042) which appeared to be new land development and also contained a rock garden along its perimeter.

The City's most recent annual report (Attachment 6) does not indicate that the City is keeping an inventory of post-construction stormwater management BMP's.

Observation #6: The EPA Inspection Team received a citizen tip which pertained to an auto-salvage yard identified as: "Old Forge Power Equipment". The EPA Inspection Team spoke with an Old Forge Power Equipment representative, Mr. Limino. Mr. Limino toured the EPA Inspection Team around the perimeter of the facility, the maintenance garage, and a portion of interior of the auto-salvage yard. The facility is near Meredith Creek, a tributary of the Lackawanna River. The goal of inspecting the facility was to view if there was potential for the facility to be discharging into the City of

Carbondale's MS4. At the time of the inspection, it did not appear that there are stormwater drains that could convey stormwater to the City's MS4. This facility will be documented in a separate report as it may not fall under the City of Carbondale's MS4 jurisdiction. Photos of Old Forge salvage yard are available in Attachment 1, Photos 2023-12-12--15.32.23_DSCN4059 through 2023-12-12--15.53.08_DSCN4069.

c. General Facility operations December 13, 2023

On December 13, 2023, the EPA Inspection Team and PADEP met for an opening conference at the City of Carbondale City Hall with representatives from the City and KBA Engineering (City engineering consultant). Mr. Grella from PADEP explained a summary of what a renewed permit application requires as well as Minimum Control Measure (MCM) requirements if the City was under an active NPDES MS4 permit. Mr. Grella then explained to the City the requirements of the Chesapeake Bay Pollutant Reduction Plan ("PRP"). The most recent version of the City's PRP is available in Attachment 11. Following the opening conference, the EPA Inspection Team inspected all City-owned properties to observe how the respective surface areas contributed to the City's MS4. The EPA Inspection Team inspected the following areas on 12/13/2023:

- Carbondale City Hall & Library parking lot
- Memorial Park
- Carbondale City Maintenance Yard & Garage
- Cerra-Leo Memorial Park
- Fall Brook Outfall & Outlet
- Gravity & Needle Park
- Racket Brook Outfalls,
- Belmont Street Park
- Russell Park
- McCawley Park

A list of the full City-owned properties documented by the City of Carbondale is available in the "City of Carbondale Standard Operating Procedures" (Attachment 7).

Carbondale City Hall & Library Parking Lot

Observation #7: The Carbondale City Hall & Library parking lot included a rain barrel for collecting and reusing rainwater flowing from the roof gutter system. (Attachment 2, Photo 2023-12-13--11.47.16_PC130003). A stormwater inlet and an outfall to the Lackawanna River were observed at the lot to discharge excess water from the lot (Attachment 2, Photo 2023-12-13--11.53.35_PC130005 through 2023-12-13--11.53.43_PC130006). The EPA Inspection Team also observed an underground pipe that

connected to the Lackawanna River (Attachment 2, 2023-12-13--11.56.30_PC130008). It is unclear where this pipe originates or if it is still able to actively discharge. The EPA Inspection Team walked over to the 6th Ave. bridge adjacent to the City Hall parking lot. City representatives stated the area in front of the bridge used to act as a catch basin channel, but that the area along with the bridge needs repair. The catch basin channel appeared to be cracked and damaged, and it is unclear when it will be repaired (Attachment 2, Photo 2023-12-13--11.58.11_PC130009 through 2023-12-13--11.58.17_PC130010).

Memorial Park

Observation #8: Memorial Park (east of the City Hall) was one of the first parks inspected on 12/13/2024. The park is small with green space in the middle and appeared well maintained (Attachment 2, Photo 2023-12-13--12.00.28_PC130011 through 2023-12-13--12.01.35_PC130012).

The City of Carbondale Maintenance Yard & Garage

Observation #9: The City of Carbondale Maintenance Yard was inspected following Memorial Park. A Department of Public Works representative, Frank Galko, was interviewed by the EPA Inspection Team and showed the EPA Inspection Team around the maintenance yard and garage. The driveway and maintenance yard were not paved and appeared to be muddy (Attachment 2, Photo 2023-12-13--12.10.38_PC130013 through 2023-12-13--12.11.05_PC130015). A majority of the items in the maintenance yard were left uncovered such as street filling materials, empty drums, and chemicals such as hydro-oil & spray foam (Attachment 2, Photo 2023-12-13--12.13.14_PC130017 through 2023-12-13--12.13.49_PC130019, 2023-12-13--12.17.45_PC130027 through 2023-12-13--12.18.15_PC130028). The EPA Inspection Team noted that several of the chemical drums were rusted or in damaged condition (Attachment 2, Photo 2023-12-13--12.14.13_PC130020 through 2023-12-13--12.14.58_PC130024). Additionally, the EPA Inspection Team noticed oil stains beneath City vehicles in multiple locations (Attachment 2, Photo 2023-12-13--12.20.55_PC130029 through 2023-12-13--12.21.58_PC130033, 2023-12-13--12.26.11_PC130038). The EPA Inspection Team also observed that the maintenance yard was storing spare parts and additional chemicals in a far corner of the facility (Attachment 2, 2023-12-13--12.23.55_PC130034 through 2023-12-13--12.24.42_PC130037). The chemicals and parts were not observed to be in secondary containment or under cover. The EPA Inspection Team further observed that the salt & red ash storage building is left open without a berm or other control to prevent the salt & red ash from exposure into the environment. At the time of inspection, red ash and salt was spilling from the storage building (2023-12-13--12.27.19_PC130039).

The EPA Inspection Team next walked inside the maintenance garages and observed staining & solids in multiple areas with maintenance crews conducting work at the time of inspection (Photo 2023-12-13--12.30.47_PC130041 through 2023-12-13--12.31.55_PC130047). The EPA Inspection Team observed two floor drains in the building. The EPA Inspection Team asked where the floor drains lead to. City representatives responded that they lead outside in the front of the building. There were no controls present to prevent any potential surrounding waste inside the garage from being discharged outside of the building (Attachment 2, Photo 2023-12-13--12.31.09_PC130043 through 2023-12-13--12.31.30_PC130045). The EPA Inspection Team asked Mr. Galko where street inlet debris is taken when street cleaning occurs. Mr. Galko replied that the City does not have a specific hauler but drops the inlet waste off to residents that volunteer to receive it. Mr. Galko also specified that the City vehicles are rentals, therefore the rental company is responsible for major maintenance of vehicles.

Cerra-Leo Memorial Park (West side of City)

Observation #10: The EPA Inspection Team drove to Cerra-Leo Park following the maintenance yard/garage inspection. The park contained a large amount of green space that included a playground and baseball field (Attachment 2, Photo 2023-12-13--12.47.44_PC130048 through 2023-12-13--12.47.49_PC130050). The park appeared to be well-maintained and was once the location of a mine fire. Riprap was also observed on the outskirts of the park (Attachment 2, Photo 2023-12-13--12.56.59_PC130051).

Fall Brook Outfall (Lackawanna River Tributary)

Observation #11: The EPA Inspection Team observed the Fall Brook Outfall to be discharging. The water in the river appeared to be clear (Attachment 2, 2023-12-13--13.15.42_PC130056). The EPA Inspection Team also noticed that there was a BMP (stormwater dry pond) across the street from Fall Brook (Attachment 2, 2023-12-13--13.06.17_PC130052 through 2023-12-13--13.08.44_PC130054). The area around the outlet was dry and the outlet structure appeared to be in good condition. However, the BMP appeared to be overgrown with vegetation and chicken dens were stored in the center of it.

Gravity, Needle Park & Racket Brook (Tributary of Lackawanna River)

Observation #12: Gravity Park and Needle Park are adjacent to each other: Gravity Park is the west side of the park, while Needle Park is the east side of the park (Attachment 2, Photo 2023-12-13--13.29.17_PC130057 through 2023-12-13--13.29.20_PC130058). Both parks appear to be well-maintained. The EPA Inspection Team also observed three adjacent outfalls on Racket Brook (Attachment 2, Photo 2023-12-13--13.29.30_PC130059). The outfalls appeared to be discharging and in good condition. The river appeared clear.

Belmont Street Park

Observation #13: This park was fenced off at the time of the inspection. However, it contains little to any permeable areas and appears to be utilized mainly as a skate park (Photo 2023-12-13--13.41.33_PC130060 through 2023-12-13--13.41.36_PC130061). It is unclear if there are drains inside of the park that would lead to the MS4.

Russell Park

Observation #14: Russell Park appears to be the largest park in the City of Carbondale. It contains a large amount of permeable space utilized as green space including a baseball field, football field, and playground. The EPA Inspection Team observed that most of the area of the park was permeable pavement excluding the tennis courts and parking lot. The sidewalk appeared to be lined with rip rap before the curb (Attachment 2, Photo 2023-12-13--15.10.26_PC130062 through 2023-12-13--15.13.01_PC130069). The parking lot contained a stormwater inlet closest to 11th Avenue (Attachment 2, 2023-12-13--15.12.48_PC130070 through 2023-12-13--15.13.01_PC130071). The stormwater inlet appeared to be well-maintained, and no debris was observed inside of the inlet.

McCawley Park

Observation #15: The EPA Inspection Team finalized the field inspection portion of the day at McCawley Park (Attachment 2, Photo 2023-12-13--15.20.37_PC130072). McCawley Park is a small grassy area with a gazebo located in the center. It is lined with a little bit of permeable area.

d. General Facility operations (12/14/2023)

The EPA Inspection Team concluded the field portion of the inspection on 12/14/2023. The EPA Inspection Team inspected White Bridge Park, East Side Park, and Anthracite Park. Anthracite Park was not listed in the “City of Carbondale Standard Operating Procedures” document (Attachment 7). Observations for each park will be discussed below.

White Bridge Park

Observation #16: This park is located on Hemlock St. It is made up of mostly permeable green space with only a small amount (estimated to be less than 25%) of it utilized as impermeable space (e.g., basketball court) (Attachment 3, Photo 2023-12-14--08.32.22_DSCN4070 through 2023-12-14--08.32.22_DSCN4072). The park appeared to be well-maintained.

East Side Park

Observation #17: This park is located at E. Garfield Avenue & Adams Ave. East Side Park appeared to be mainly composed of permeable surface aside from a basketball court. The grading of the area suggests that stormwater flows into the street inlet at E. Garfield Avenue and Adams Avenue (Attachment 3, Photo 2023-12-14--09.10.01_DSCN4080 through 2023-12-14--09.10.56_DSCN4084). The park appears to be well-maintained aside from a club house that has deteriorated. Water appears to accumulate on the edge of E. Garfield Street closest to the park (Attachment 3, Photo 2023-12-14--09.10.25_DSCN4082, 2023-12-14--09.10.01_DSCN4080).

Anthracite Park

Observation #18: Anthracite Park is located at Clidco Drive. This property contained only permeable surface and appeared to be well-maintained (Photo 2023-12-14--09.19.07_DSCN4086 through 2023-12-14--09.19.47_DSCN4089).

IV. Records Review

Before the opening conference, the EPA Inspection Team reviewed documentation including:

- the City's expired permit (Attachment 4),
- the Carbondale MS4 Mapping 2021 Update Submitted to EPA 1-7-21 (Attachment 5),
- 2020-2023 annual reports (Attachment 6 includes 2023 Annual report),
- City of Carbondale Standard Operating Procedures (Attachment 7),
- 2020 Deficiency Letter (Attachment 8),
- 2023 Deficiency Letter (Attachment 9),
- Reminder of Permit Expiration Letter (Attachment 10), and
- City's most recent Chesapeake Bay Pollutant Reduction Plan (Attachment 11)
- KBA engineering submitted an updated City of Carbondale Standard Operating Procedures (Attachment 7) document on 12-8-2023

KBA engineering submitted an updated City of Carbondale Standard Operating Procedures (Attachment 7) document to EPA on 12/8/2023, and EPA received it on December 8, 2023. A copy of the expired Permit is provided under Attachment 4.

V. Closing Conference

After the 12/13/2023 field inspection, the EPA Inspection Team returned to City Hall for a closing conference. All participants were present aside from the Department of Public Works representative, Frank Galko. The EPA Inspection Team reiterated to the City representatives that all preliminary observations discussed were not compliance determinations. Any and 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 after EPA reviewed additional materials following the inspection. The inspection concluded on 12/14/2023 at approximately 11:00 AM.

VI. List of Attachments

- Attachment 1: December 12, 2023 Photo Log
- Attachment 2: December 13, 2023 Photo Log
- Attachment 3: December 14, 2023 Photo Log
- Attachment 4: NPDES Permit PAI132246 (Issued 6/15/2015)
- Attachment 5: Carbondale MS4 Mapping 2021 Update Submitted to EPA 1/7/2021
- Attachment 6: 2023 Annual Report
- Attachment 7: City of Carbondale Standard Operating Procedures
- Attachment 8: 2020 Deficiency Letter from PADEP
- Attachment 9: 2023 Deficiency Letter from PADEP
- Attachment 10: Reminder of Permit Expiration Letter from PADEP
- Attachment 11: Chesapeake Bay Pollutant Reduction Plan (PRP) submitted by Carbondale to PADEP in January 2020