



**ANTRIM TOWNSHIP, PENNSYLVANIA
MUNICIPAL SEPARATE STORM
SEWER SYSTEM (MS4) PROGRAM
OFFSITE COMPLIANCE REVIEW REPORT**

**Remote Interview Dates: February 22, 23, and 24, 2022
Field Visit Date: March 17, 2022**

Report Date: March 31, 2022

Unique Project Identifier: 3E22WN055A

**U.S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Water Branch – NPDES Section (3ED32)
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March 31, 2022

Date

EPA Region III Official:



April 8, 2022

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Date

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Table 1. Summary of Permit Requirements and Review Observations

Program Element	Observations
Overall Program Management	No areas of concern noted.
MCM 3 (Illicit Discharge Detection and Elimination (IDD&E))	Observation 1. The Township had not formally identified or documented priority areas within the Township. Observation 2. The Township's MS4 mapping did not appear to be complete at the time of the review. Observation 3. At the time of the review, the Township had not yet completed dry weather screening activities at its MS4 outfalls.
MCM 5 (Post-Construction Stormwater Management)	Observation 4. At the time of the review, it did not appear that the Township was ensuring that adequate Operation and Maintenance (O&M) was being conducted on privately-owned post-construction stormwater management (PCSM) best management practices (BMPs). Observation 5. It did not appear that the Township's post-construction stormwater control inventory contained all the Permit-required elements.
MCM 6 (Pollution Prevention and Good Housekeeping)	Observation 6. It did not appear that the Township had fully developed a written pollution prevention / good housekeeping (PPGH) O&M program that includes all Permit-required components for all Township-controlled operations, facilities, and activities that could contribute to the discharge of pollutants from the regulated small MS4. Observation 7. The Township had not conducted annual training for all relevant employees and contractors as required by the Permit.
Pollutant Reduction Plan (PRP)	No areas of concern noted.

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INTRODUCTION

On February 22, 23, and 24, staff from U.S. Environmental Protection Agency (EPA) Region III and EPA's contractors, PG Environmental (hereinafter, EPA Review Team) conducted an offsite compliance review of the municipal separate storm sewer system (MS4) program of Antrim Township, Pennsylvania (hereinafter, Township or Permittee). Representatives of the Pennsylvania Department of Environmental Protection (PADEP) also attended the offsite review. Discharges from the Township's MS4 are regulated by the National Pollutant Discharge Elimination System (NPDES) Individual Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (PAI133536, hereinafter, the Permit), effective July 1, 2018 – June 30, 2023. A copy of the Permit is included as [Appendix A](#).

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

The review focused on the following Permit components:

- Overall Program Management
- Illicit Discharge Detection and Elimination (IDDE)
- Post Construction Stormwater Management (PCSM)
- Pollution Prevention/Good Housekeeping (PPGH)
- TMDL Pollutant Reduction Plan (PRP)

The EPA Review Team obtained its information through a records review and a series of interviews via conference calls with Township representatives. A copy of the EPA records request and review agenda is included in [Appendix B](#). The following primary representatives were involved in the review:

Township Representatives: Ms. Amber Reasner – Assistant Zoning Officer/Assistant Code Enforcement Officer
Ms. Sylvia House – Zoning Officer
Mr. Rodney Eberly – Road Master

EPA Representatives: Ms. Allison Gieda – EPA Region 3
Mr. Shane McAleer – EPA Region 3
Mr. Peter Gold – EPA Region 3
Mr. Chuck Schadel – EPA Region 3
Mr. Edward Simas – EPA Region 3
Ms. Angela Weisel – EPA Region 3

State Representatives: Ms. Leah Staley – PADEP
Mr. Jake Rakowsky – PADEP
Mr. Scott Arwood – PADEP

EPA Contractors: Mr. Taylor Fontaine – PG Environmental
 Ms. Kate Forsmark – PG Environmental

ANTRIM TOWNSHIP BACKGROUND

The Township encompasses approximately 70 square miles of land in Franklin County, in southern Pennsylvania. The 2020 U.S. Census population total for the Township was 15,778. The Township is located south of the City of Chambersburg, and the Pennsylvania/Maryland State line represents the southern boundary. The Township surrounds the Borough of Greencastle, which is a separately governed municipality. The Township lies completely within the Chesapeake Bay Watershed, and the primary MS4 receiving waters are unnamed tributaries to Muddy Run, Paddy Run, Conococheague Creek, and Marsh Run. The Township is primarily a rural and agricultural community with some residential, industrial, and commercial land use.

The Township's MS4 program was established in 2004 when the Township was originally designated as a small MS4. The Township's MS4 program is overseen by the Township Assistant Zoning Officer/Assistant Code Enforcement Officer with support from the Road Department, Public Works Department, and Parks and Recreation Department. The Township contracted with Dewberry Engineers Inc. (Dewberry) for assistance with implementing the Township's MS4 program. Dewberry reviews construction engineering plans, performs construction inspections, develops MS4-related documents, and maintains the MS4 mapping on behalf of the Township.

The MS4 program is funded through the Township's General Fund. The Township does not have a stormwater fee or tax. At the time of the review, the Township was considering implementing a stormwater fee during the next permit cycle. Township representatives explained that the Township's MS4 is composed of Township-owned roads, open roadside swales and channels that discharge to private stormwater infiltration ponds or have the potential to sheet flow onto private property. Though located within the Township, Greencastle Borough is a separately permitted MS4 system. There are no existing agreements between the two municipalities.

The Township maintains a memorandum of understanding with the Franklin County Conservation District for implementation of the Township's Construction Stormwater Runoff Control program (MCM #4). The Township's implementation of MCM #4 requirements was not evaluated as part of this compliance review.

The Township has a stormwater management plan (SWMP), last updated in 2019, that contains procedures for implementing the MS4 program (refer to [Appendix C, Exhibit 1](#)).

INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Review Team provided the Township with a written list of requested records on February 3, 2022 (refer to [Appendix B](#)). The Township made numerous documents available electronically to the EPA Review Team. Following the discussions with Township representatives, the EPA Review Team requested additional program documentation via e-mail on February 25, 2022. The Township provided the requested documents to the EPA Review Team electronically on March 2, 2022.

During the review, the EPA Review Team obtained documentation and other supporting evidence regarding compliance with the Permit. Referenced documentation used as supporting information is provided in [Appendix C](#), Exhibit Log.

The following sections of this report describe the Township’s approach to implementing specific minimum control measures (MCMs), the relevant Permit requirements, and observations made during the review.

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDD&E)

The Township regularly distributes information to the public on illicit discharges and how to report them. Township residents can report illicit discharges either by phone or with a complaint form on the Township’s website. In its SWMP, the Township has written procedures for its IDD&E program (refer to [Appendix C, Exhibit 1](#)). The Township’s Stormwater Management Ordinance (approved in 2006) prohibits illicit discharges and connections to the Township’s MS4 and authorizes the Township to impose fines and other penalties against violators of the ordinance (refer to [Appendix C, Exhibit 2](#)). During the review, Township representatives stated that formal IDD&E enforcement actions had not occurred.

At the time of the review, the Township had developed and implemented a written IDD&E plan. Minimum Control Measure #3 of the Township’s SWMP contains the best management practices (BMPs) to support the implementation of the written IDD&E program (refer to [Appendix C, Exhibit 1](#)). The written program includes the appropriate procedures for identifying and eliminating illicit discharges. The program focuses on identifying areas with high potential for illicit discharges, spills or contamination as well as conducting routine screening of all outfalls.

Permit Part C.I.B.3.a (IDD&E) states that all permittees must “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.”

Observation 1: The Township has procedures for identifying priority areas; however, the Township stated that it had not formally implemented the procedures and identified or documented priority areas within the Township.

Permit Part C.I.B.3.b (IDD&E) states that all permittees must “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).”

Permit Part C.I.B.3.c (IDD&E) 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.”

Observation 2: The Township’s MS4 mapping did not appear to be complete at the time of the review. The Township provided MS4 maps showing urbanized areas (UAs), roadways, outfalls (approximately 23), drainage areas, and waterbodies (refer to [Appendix C, Exhibit 3](#)). However, the existing maps did not appear to include all Permit-identified Township-owned/operated components (e.g., swales, channels) and the maps were last updated in 2019. At the time of the review, the Township was in the process of updating the mapping from computer-aided design (CAD) drawings to a geographic information system (GIS) format. The Township also stated that it was in the process of creating an inventory of all Township owned and operated MS4 components to add to the outfall maps.

Permit Part C.I.B.3.d (IDD&E) states the permittee, “shall conduct dry weather screenings of its MS4 outfalls and observation points to evaluate the presence of illicit discharges...”

“For existing permittees, each of the identified regulated small MS4 outfalls shall be screened during dry weather at least once by March 15, 2023. For areas where past problems have been reported or known sources of dry weather flows occur on a continual basis, outfalls shall be screened annually during each year of permit coverage...”

“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. If an outfall flow is determined by the permittee to be illicit, the actions taken to identify and eliminate the illicit flow shall also be documented.”

Observation 3: In response to the EPA Records Request, the Township provided the EPA Review Team with a copy of its outfall inspection reports for twenty-three (23) identified outfalls (refer to [Appendix C, Exhibit 4](#)). However, at the time of the review, The Township had not yet completed dry weather screening activities at their MS4 outfalls. The Township stated it was planning to complete the dry weather screening activities in 2022.

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

During the review, Township representatives stated that proposed construction projects in the Township (including those with post-construction controls) are required to submit erosion and sediment pollution control (E&SPC) plans to both the Township and the Franklin County Conservation District for review and approval. Design requirements for post-construction stormwater controls are specified in the Township's Stormwater Management Ordinance and may differ from the requirements of the Conservation District. The Township's Stormwater Management Ordinance provides legal authority for requiring post-construction stormwater controls in new development and redevelopment (refer to [Appendix C, Exhibit 2](#)). The Township's SWMP also contains written procedures for the PCSM Program.

Permit Part C.I.B.5.c (Post Construction Stormwater Management) states that all permittees must "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."

Observation 4: At the time of the review, it did not appear that the Township was ensuring that adequate Operation and Maintenance (O&M) was being conducted on privately-owned post-construction stormwater management (PCSM) BMPs. Additionally, the Township did not have a process to ensure that when a property changed ownership, the new owners are made aware of PCSM BMP O&M obligations.

The Township stated that the Road Department and Parks Director maintain the Township-owned and operated PCSM BMPs; however, the Township was unsure if written maintenance reports are generated to document these activities.

Permit Part C.I.B.5.c (Post Construction Stormwater Management) states "An inventory of PCSM BMPs shall be developed by new permittees by the end of the first year of General Permit coverage and shall be continually updated during the term of coverage under the General Permit as development projects are reviewed, approved, and constructed. Existing permittees shall update and maintain its current inventory during the term of coverage under the General Permit. The permittee must track the following information in its PCSM BMP inventory:

- 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; and
- 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: It did not appear that the Township’s PCSM BMP inventory included all Permit-required information. In response to the EPA Records Request, the Township provided the EPA Review Team a Microsoft Excel-based inventory of Township-owned and privately-owned PCSM BMPs that identifies a unique number and BMP type for all known BMPs. However, the provided inventory did not identify the exact location, owner, installation date, maintenance requirements, and conducted maintenance activities for each PCSM BMP. At the time of the review, the Township stated that it was in the process of updating the inventory but did not provide an anticipated date of completion.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING

The Township’s primary location for municipal operations is the Township Municipal Building, located at 10655 Antrim Church Rd, Greencastle, PA. Municipal activities conducted at the facility include vehicle maintenance and parking, equipment maintenance and storage, storage of de-icing materials, fueling and vehicle washing. The Township Road Department sweeps Township roads once per year in the spring. Street sweeping and culvert cleaning materials are disposed of at a local Township landfill, not located within the UA.

Permit Part C.I.B.6.b (Pollution Prevention / Good Housekeeping) states that the Permittee must “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 removal 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 containing in the PAG-03 NPDES Permit for Stormwater Discharges Associated with Industrial Activity.

- Procedures for the proper disposal of waste, including dredge soil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.”

Observation 6: It did not appear that the Township had developed a written pollution prevention / good housekeeping (PPGH) O&M program that includes all Permit-required components for all Township-controlled operations, facilities, and activities that could contribute to the discharge of pollutants from the regulated small MS4. In response to the EPA Review Team’s records request, the Township provided a copy of its PPGH O&M program (refer to Appendix C, Exhibit 5). The Township stated that Township staff perform unofficial daily inspections of the municipal building. However, the PPGH O&M program does not provide inspection procedures to reduce the potential for pollutants to reach the regulated small MS4. The Township also does not maintain records of these unofficial inspections.

The PPGH O&M program does not include controls for reducing or eliminating the discharge of pollutants. Additionally, the PPGH O&M program does not include procedures for the proper disposal of waste, including street sweepings and catch basin cleaning debris.

Permit Part C.I.B.6.c (Pollution Prevention / Good Housekeeping) states that all permittees must “Develop and implement an employee training program that addresses appropriate topics to further the goal of preventing or reducing the discharge of pollutants from operations to the regulated small MS4. The program may be developed and implemented using guidance and training materials that are available from federal, state, or local agencies, or other organizations. All relevant employees and contractors shall receive training (i.e., public works staff, building, zoning, and code enforcement staff, engineering staff, police and fire responders, etc.). Training topics shall include operation, inspection, maintenance, and repair activities associated with any of the operations identified under BMP #1. Training must cover all relevant parts of the permittee’s overall stormwater management program that could affect operations, such as illicit discharge detection and elimination, construction sites, and ordinance requirements.

1. New permittees shall develop and implement a training program that identifies the training topics that will be covered and what training methods and materials will be used by the end of the first year of General Permit coverage.
2. All permittees must review and update the training program each year of General Permit coverage, as necessary.
3. Employee training shall occur at least annually and shall be documented in writing and reported in Annual MS4 Status Reports. Documentation shall include the date(s) of the training, the names of attendees, the topics covered, and the training presenter(s).”

Observation 7: The Township had not conducted annual training for all relevant employees and contractors as required by the Permit. In response to the EPA Review Team’s records request, the Township provided a copy of its MS4 trainings for 2019-2021 and an example training curriculum (refer to Appendix C, Exhibit 6). In reviewing the attendance sheet provided by the Township, the

EPA Review Team noted that only two (2) employees attended the trainings and that the training had not been provided to all relevant employees (e.g., Road Department, Public Works Department, and Parks and Recreation Department were not trained). The Township stated that it was hoping to host a larger training in the future but had not formalized any plans to do so at the time of the review.

Upon reviewing the training materials provided by the Township, the EPA Review Team also noted that the training did not cover all relevant parts of the Township's stormwater management program. For example, construction sites and ordinance requirements were not included in the training.

POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTIONS PLANS

Permit Part C.II requires the Permittee to develop a PRP since the MS4 has “at least one MS4 outfall that discharges to surface waters within the Chesapeake Bay watershed, or otherwise has at least one discharge to storm sewers owned or operated by a different entity within the Chesapeake Bay watershed.”

Dewberry originally developed the Township's Pollutant Reduction Plan (PRP) in 2017, which was approved by PADEP in 2018 (refer to [Appendix C, Exhibit 7](#)). The Township's PRP is available online and the Township stated that the public provided comments and input on the PRP. Based on conversations with the Township, the Township appears to be on schedule to implement the PRP in accordance with the schedule identified within. The stormwater control projects are currently in the design and permitting phase. The Township explained that it expected construction to commence in 2023.