



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): 04/22/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Stormwater
Site/Facility Name: Borough of Lemoyne MS4
Permittee(s): Borough of Lemoyne
Site/Facility Operator: Borough of Lemoyne
Site/Facility Address: 510 Herman Avenue
Lemoyne, PA 17043
Latitude: 40.241640 **Longitude:** -76.893210
County/Parish: Cumberland
General Permit #: PAG013
Site Specific Permit #: PAG133552
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E22WN083A

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

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- Attachment A: Photo Log
- Attachment B: Permit
- Attachment C: PCSWMBMP LB Smith Ford Documents

I. Introduction

On April 22, 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 Borough of Lemoyne Municipal Yard at 1 Lowther Street, Lemoyne, PA. At the facility, the EPA Inspection Team met with Cliff Karlsen (Lemoyne, Maintenance Superintendent). 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 an inspection of the one of the borough’s municipal yards. An additional PCSWMBMP was inspected while in the field. 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 1 Lowther Street at approximately 9:00 AM for the announced inspection. The EPA Inspection Team identified themselves to the Borough Representatives, displayed their credentials and described the purpose of the compliance inspection. The EPA Inspection Team with the Borough Representative then walked the facility and inspected the four PCSWMBMPs. The Inspection Team’s observations are listed later in this document and are grouped by type of observation made.

B. Weather and Precipitation Conditions

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

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
Carlisle Water Plant, PA US USC00361920	04/17/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/18/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/19/2022	0.87
Carlisle Water Plant, PA US USC00361920	04/20/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/21/2022	0.00
Carlisle Water Plant, PA US USC00361920	04/22/2022	0.05

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

II. Facility Activity

The Borough of Lemoyne is in Cumberland County Pennsylvania. The borough is bordered to the east by the Susquehanna River, to the west by Camp Hill Borough, to the south by Lower Allen Township and the north by Wormleysburg. The borough has an area of 1.6 square miles and a population of approximately 4,500 residents.

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 municipal yard and four 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...”

Observation #1:

During the inspection of the Municipal Yard, the EPA Inspection Team observed piles of compost material, scrap wood, cold patch asphalt and millings on the Municipal Yard lot. There appeared to be no observed controls in place to minimize transport or exposure to stormwater (Photographs DSCN3340 and DSCN3342 through DSCN3347 of the Photo Log). It appeared that cold patch asphalt had migrated from the cold patch pile to an area beyond the fence line of the yard (Photograph DSCN3348 of the Photo Log). There was a tote containing used oil outside the garage; there was no containment observed around the tote (Photograph DSCN3349 of the Photo Log). On April 28, 2022, photo documentation was provided by the borough showing that the used oil tote was moved indoors, and the cold patch was used and no longer stored on site.

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:

The dry weather screening forms were not contained in the annual reports but were provided to the EPA Inspection Team after the inspection.

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 directed in the plans.

The EPA Inspection Team inspected four PCSWMBMPs within the Borough:

The BMP at the Lemoyne Post Office appeared to be well vegetated, and the inflow and outflow structures appeared un-obstructed (Photograph DSCN3354 of the Photo Log).

The BMP at Lemoyne Square appeared to be well vegetated, and the inflow and outflow structures appeared un-obstructed (Photograph DSCN3359 of the Photo Log).

The BMP Quaker 525 Realty appeared to have some minor erosion along its bank (Photograph DSCN3361 of the Photo Log). The inflow and outflow structures appeared to be unobstructed.

At LB Smith Ford, the EPA Inspection Team observed a sink hole in the floor/bottom of the BMP, that revealed a cracked pipe (Photographs DSCN3370 and DSCN3371 of the Photo Log). Although dry at the time of inspection, water from the BMP could potentially enter the sinkhole and pipe. The EPA Inspection Team requested previous inspections of this BMP. A June 2020 Borough Engineer inspection was provided to the EPA Inspection Team. The June 2020 inspection documented and photographed multiple sinkholes in the basin; it cannot be determined if one of these was the same sinkhole observed during the EPA Inspection. On April 28, 2022, documentation was provided by the borough documenting that the sinkhole was filled, and the observed pipe was plugged.

III. Records Review

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

IV. 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 11:00 AM (EDT).