



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): October 18, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Municipal Separate Storm Sewer System (MS4) Program
MS4 Name: West Manchester Township MS4
MS4 Address: 380 E. Berlin Road, York, PA 17408
Latitude: 39.9733N **Longitude:** 76.7862W
County/Parish: York County
General Permit #: PAG-13
Specific Permit #: PAG133655
Main Surface Water: Codorus Creek/Little Conewago Creek/Susquehanna River
NAICS Code: 924110 **SIC:** 9511
Unique Project #: 3E23WN004A

MS4 Representative(s):

Point of Contact

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Unique Project #: 3E23WN004A

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List of Attachments

- Attachment 1: NPDES MS4 Permit No. PAG133655
- Attachment 2: 2021 MS4 Annual Report
- Attachment 3: MCM 3 Outfall Map
- Attachment 4: MCM 5 BMP Inventory
- Attachment 5: PCSM BMP As-built Plans
- Attachment 6: MCM 6 Good Housekeeping O&M Plan
- Attachment 7: Photo Log

I. Introduction

On October 18, 2022, an inspection team comprised of staff from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") met with representatives of West Manchester Township ("Township") at the Township's municipal yard. The purpose of the inspection was to review the Township's compliance with their Pennsylvania Department of Environmental Protection ("PADEP") National Pollutant Discharge Elimination System ("NPDES") General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) Permit No. No. PAG133655 ("Permit").

Prior to the inspection, the EPA Inspection Team reviewed Attachment 2 - 2021 MS4 Annual Report. The EPA Inspection Team also requested and reviewed; Attachment 3 – MCM 3 MS4 Outfall Map; Attachment 4 – MCM 5 BMP Inventory; Attachment 5 – PCSM BMP As-built Plans; and Attachment 6 – MCM 6 Good Housekeeping O&M Plan.

As part of the inspection, the EPA Inspection Team reviewed efforts regarding minimum control measures ("MCM") for illicit discharge detection and elimination ("IDDE"); post-construction stormwater management ("PCSM"); and pollution prevention and good housekeeping for facilities owned or operated by the Township within the Municipal Separate Storm Sewer System ("MS4") service area. The EPA Inspection Team inspected three post-construction stormwater management facilities that were selected by the EPA Inspection Team prior to the inspection and the Township's municipal yard.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the municipal yard at approximately 9:15 AM. The EPA Inspection Team identified themselves to the Township representatives, displayed their credentials and described the purpose of the compliance inspection. The following inspectors and representatives were present for the inspection:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Angela Weisel	EPA Region III	(215) 814-2124	Weisel.angela@epa.gov
Chuck Schadel	EPA Region III	(215) 814-5761	Schadel.chuck@epa.gov
Facility Representatives			
Zane Williams	West Manchester Township	(717) 792-3505	zwilliams@wmtwp.com
Rich Shaw	West Manchester Township	(717) 792-3505	rshaw@wmtwp.com

The EPA Inspection Team proceeded to inspect the maintenance facility and the three PCSM facilities with Township representatives present. The EPA Inspection Team's observations are listed later in this document and are grouped by type of observation.

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 Table 2 below:

Table 2: Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
YORK 2.5 NNW, PA US	10/13/22	0.07
YORK 2.5 NNW, PA US	10/14/22	0.43
YORK 2.5 NNW, PA US	10/15/22	0.00
YORK 2.5 NNW, PA US	10/16/22	0.00
YORK 2.5 NNW, PA US	10/17/22	0.00
YORK 2.5 NNW, PA US	10/18/22	0.00

II. MS4 Activity

West Manchester Township is located in York County, Pennsylvania. The Township owns and operates an MS4 that consists of manmade and natural components (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) of a stormwater management infrastructure to both limit and manage the volume of stormwater to mitigate flood events and to minimize degradation of the Township's waterways through stormwater quality management. Per the United States 2020 census, the Township had a total population of 19,206 people and a total area of 19.94 (mi²).

III. Observations

The EPA Inspection Team conducted inspections of the Township's municipal yard including the Highway and Recreation Garage, and three PCSM Best Management Practices (“BMPs”). The observations made by the EPA Inspection Team are identified below. Photographs taken during the field visits were taken by Chuck Schadel and are included in Attachment 7 – Photo Log.

MCM 3: Illicit Discharge Detection and Elimination (IDDE)

Permit Part C.I.B.3.c (MCM 3, BMP #3) 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 Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

Observation 1: In Attachment 2 – 2021 MS4 Annual Report, the Township indicates that a map containing all components of BMP #3 is not completed and has not been updated since September 11, 2017. The 2021 Annual Report indicates that the map was expected to be completed by September 30, 2022. Following the inspection, the Township provided an updated map dated October 19, 2022 to EPA (Attachment 3).

MCM 5: Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment

Permit Part C.I.B.5.c (MCM 5, BMP #3) 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...

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.*
- *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 2: The Township provided the EPA Inspection Team with its PCSM BMP Inventory for 2022 (Attachment 4), which provides information regarding their efforts to track PCSM facilities. According to Attachment 4 and the 2021 Annual Report, all PCSM BMP inspections that are required by the Permit were completed during the July 1, 2020 to June 30, 2021 reporting period.

Observation 3: As-built plans for three PCSM BMPs were requested and reviewed by the EPA Inspection Team (refer to Attachment 5 for the plans). The EPA Inspection Team inspected three BMPs: Ensminger Drive Swale (See Photographs PA180063 through PA180072), Little Creek Stream Restoration (See Photographs PA180076 through PA180087), and Chestnut Hollow (See Photographs PA180091 through PA180096). It

appeared during the field inspections that all BMPs inspected were located, configured, and contained the inlets and outlets as recorded on the plans.

MCM 6: Pollution Prevention / Good Housekeeping

Permit Part C.I.B.6 (MCM 6) 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”

Permit Part C.I.B.6.b (MCM 6, BMP #2) 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 4: During the inspection of the Highway and Recreation Garage, trench drains were observed. Township representatives stated that the trench drains lead to an oil/water separator and a grease trap before connecting to a sanitary sewer line. The drains collect fluids from the large section of the garage used for vehicle and equipment storage. Township representatives stated all equipment is stored indoors when not in use. Trench drains can be observed in photographs PA180045, PA180047, and PA180049 in Attachment 7 – Photo Log.

Observation 5: The EPA Inspection Team observed the salt shed in the municipal yard. The right side of the shed was used for road salt, and the left side was used for anti-skid material. There were no berms or tarps observed at the time. However, there was little to no migration from the piles at the time of inspection. The salt shed storage area can be observed in photograph PA180051 in Attachment 7 – Photo Log.

Observation 6: The EPA Inspection Team observed sediment track out throughout the municipal yard. Township representatives claimed that street sweeping is done on site about twice a year. Conditions at the time of the inspection can be observed in photographs PA180050 and PA180058 in Attachment 7 – Photo Log.

Observation 7: More specifically, sediment was observed near the inlet outside of the salt shed and the inlet near the stone aggregate piles, where it is potentially exposed to stormwater transport. Conditions at the time of the inspection can be observed in photographs PA180051, PA180053, and PA180060 in Attachment 7 – Photo Log.

Observation 8: The EPA Inspection Team observed five storage bunkers in the municipal yard. Three bunkers were empty, while one was used for coal patch, and another for stone aggregate. The coal patch pile was not covered. The stone aggregate pile was covered using a tarp. No migration of materials was observed for either bunker. The bunkers can be observed in photographs PA180061 and PA180062 in Attachment 7 – Photo Log.

Observation 9: The EPA Inspection Team observed several piles of stone aggregates and soil behind the Highway and Recreation Garage. This includes a pile of asphalt millings. No berms or coverings were observed at the time. Conditions of the site at the time can be observed in photographs PA180056 through PA180059 in Attachment 7 – Photo Log.

Permit Part C.I.B.6.c (MCM 6, BMP #3) requires municipalities to “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.

*...
(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 9: The Township provided a record of training within the 2021 MS4 Annual Report for reporting period July 1, 2020 to June 30, 2021. The record of training included the latest date of training, topics covered, names of presenters and attendees. Records can be observed in Attachment 2 – 2021 MS4 Annual Report.

IV. Records Review

As part of this inspection, the EPA Inspection Team reviewed the documents identified in the List of Attachments on Page 2 of this report. Following the inspection, the EPA Inspection Team reviewed the latest inspections of the BMPs visited as well.

V. Closing Conference

At the conclusion of the field inspection, the EPA Inspection Team conducted a closing conference with Township representatives and shared preliminary observations. The EPA Inspection Team reiterated to the Township representatives that all preliminary observations discussed were not compliance determinations. Preliminary observations shared with the Township 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 12:15 PM (EDT).