



**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION
WATER BRANCH – NPDES SECTION (3ED32) CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: Lancaster Township MS4
Facility Address: 1240 Maple Avenue, Lancaster, PA 17603
Mailing Address: 1240 Maple Avenue, Lancaster, PA 17603

Report Prepared on: April 9, 2022 By: Taylor Fontaine
Date Taylor Fontaine, Environmental Scientist
(PG Environmental, EPA Contractor)

Report Final as of: _____ By: _____
Date Jessica Duffy, Acting Chief, NPDES Section
(EPA)

General Information

Type of Inspection:	MS4 Compliance Inspection
Owner:	Lancaster Township
Operators:	Lancaster Township
Permittee:	Lancaster Township
NPDES Permit No:	PAG133584
NPDES Permit Effective Date:	March 16, 2018
NPDES Permit Expiration Date:	March 15, 2023
Receiving Water(s) and/or MS4:	Conestoga River and Little Conestoga Creek
Latitude and Longitude:	40.0349, -76.3344

On-Site Facility Site Visits Overview

On March 16, 2022, a representative from U.S. Environmental Protection Agency (EPA) Region III and EPA contractor, PG Environmental, (hereinafter, “EPA Inspection Team”) conducted site visit inspections of multiple locations that discharge to the Lancaster Township, Pennsylvania (hereinafter, “Township” or “Permittee”) Municipal Separate Storm Sewer System (MS4). These in-person site visits complemented an EPA offsite compliance review of the Township’s MS4 program conducted through virtual meetings with Township representatives on February 16, 17, and 18, 2022. Both the offsite review and site visit inspections were conducted to assess the Township’s compliance with the requirements of Pennsylvania’s *National Pollutant Discharge Elimination System (NPDES) General Permit (GP) for Discharges from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. PAG133584; hereinafter, the “Permit”). A copy of the Permit is provided in Appendix A.

Approximate Entry Time: 9:00 AM (EDT) **Approximate Exit Time:** 3:30 PM (EDT)

Unique Project Identifier (UPI): 3E22WN054A

TABLE OF CONTENTS

Introduction.....	3
Inspection Process.....	3
Site Visit Observations	5
Site No. 1: Township Site for Potential Floodplain Restoration BMP	5
Site No. 2: Township MS4 Outfall #LC130	6
Site No. 3: Kensington Club Basin Rehabilitation Project	7
Site No. 4: Springhouse Road Swale	8
Site No. 5: Chadwick Circle Detention Basin.....	9
Site No. 6: Gable Park Basin	10
Site No. 7: Southern Village Detention Basin	11
Site No. 8: Township Outfall #CR190.....	12
Site No. 9: Township Outfall #LC030	13
Site No. 10: Township Public Works Campus	14
Closing Conference.....	15
Site Visit Photos.....	16

Appendix A: Pennsylvania’s NPDES Individual Permit for Stormwater Discharges from Small MS4s

Appendix B: Exhibit Log

- Exhibit 1 – Site Inspection Sign-in Sheet
- Exhibit 2 – Township MS4 Maps
- Exhibit 3 – Post-Inspection Township Improvements

INTRODUCTION

On March 16, 2022, the EPA Inspection Team conducted site visit inspections of multiple locations that discharge to the Township MS4. This report includes observations and photographs from inspections conducted at ten (10) locations: one (1) Township owned and operated facility, five (5) privately-owned and operated post-construction best management practices (BMPs), three (3) Township MS4 outfalls, and one (1) potential site for a privately owned and operated post-construction BMP.

INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Township Office at 9:00 a.m. (EDT) for the inspection. Taylor Fontaine of PG Environmental displayed his Clean Water Act inspector credential to Township representatives at the outset of the inspection and explained that the purpose of the inspection was to make field observations to complement an offsite compliance review of the Township's MS4 program conducted on February 16, 17, and 18, 2022. Table 1 describes the individuals that participated in the inspection. A copy of the inspection sign-in sheet is included as Appendix B, Exhibit 1.

Table 1. Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Contractors			
Taylor Fontaine, Inspector	PG Environmental	(703) 956-1977	taylor.fontaine@pgenv.com
Rob Naeser, Inspector	PG Environmental	(720) 789-8049	rob.naeser@pgenv.com
Township Representatives			
Benton (Ben) Webber	Township Engineer	(223) 221-7522	bwebber@twp.lancaster.pa.us
Devin Groff	Township Public Works Superintendent	(223) 221-7523	dgroff@twp.lancaster.pa.us
EPA Representative			
Shane McAleer	U.S. EPA Region III	(215) 814-5616	mcaleer.shane@epa.gov
State or County Representatives			
Leah Staley	Pennsylvania Department of Environmental Protection (PADEP)	(717) 705-4814	lestaley@pa.gov

Weather and Precipitation:

During the inspection, there were sunny skies and temperatures averaging approximately 63 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and six days prior are provided in the table below.

Table 2. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches) ¹
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 10, 2022	0.54
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 11, 2022	0.04
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 12, 2022	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 13, 2022	0.19 (rain), 3.5 (snow)

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

Station Name	Date	Precipitation Amount (inches) ¹
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 14, 2022	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 15, 2022	0.0
LANCASTER 2 NE FILT PLANT, PA US – USC00364763	March 16, 2022	0.0

SITE VISIT OBSERVATIONS

Site No. 1: Township Site for Potential Floodplain Restoration BMP

Address/Location: 40.0476, -76.3424, West along Marietta Avenue, past River Drive

Relevant MCM: Post Construction Stormwater Management

Entry Time: 9:45 AM (EDT)

Exit Time: 9:53 AM (EDT)

Table 1.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Township site for potential floodplain restoration BMP is located within the Township on private land, parallel to Marietta Avenue, west of River Drive. There is an unnamed stream that flows southwest underneath Marietta Avenue before it empties into Little Conestoga Creek. According to the Township Engineer, the location for a potential floodplain restoration BMP as part of the planned “Little Conestoga Blue/Green Corridor Project” is along this unnamed creek.

Appendix A.MCM #5.BMP #3, requires the Township 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, including projects less than one acre that are part of a larger common plan of development or sale.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Township’s site for a potential floodplain restoration BMP.

- 1) The EPA Inspection Team observed the planned location for a floodplain restoration BMP. The Township representative stated that the goal of the project is to restore the streambank that had become eroded (refer to [Photographs 1 through 4](#)), and to reduce sediment and nutrient loadings to Little Conestoga Creek. The approximate planned development timeline of the project was not confirmed at the time of the inspection.

Site No. 2: Township MS4 Outfall #LC130

Address/Location: 40.0474, -76.3434, West along Marietta Avenue, past River Drive

Relevant MCM: IDD&E

Entry Time: 9:56 AM (EDT)

Exit Time: 10:00 AM (EDT)

Table 2.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Outfall #LC130 is located at the confluence of an unnamed tributary to Little Conestoga Creek and Little Conestoga Creek, south of Mariette Avenue. The unnamed tributary to Little Conestoga Creek collects stormwater from the adjacent streets (Valley Road, River Drive, and Marietta Avenue) as well as the adjacent Manheim Township roadways, and eventually flows through the outfall and into Little Conestoga Creek.

Maps of the Township’s MS4 system are included in Appendix B, Exhibit 2.

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.”

Site Visit Observations: The EPA Inspection Team made the following observation related to the Township’s Outfall #LC130.

- 1) Outfall #LC130 is identified on the Township’s MS4 mapping, and there were no observations of note with respect to the outfall (refer to Photograph 5).

Site No. 3: Kensington Club Basin Rehabilitation Project

Address/Location: 555 Misty Dr., Lancaster, PA 17603

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:25 AM (EDT)

Exit Time: 10:35 AM (EDT)

Table 3.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: According to the Township representative, the Kensington Club Basin Rehabilitation Project was undertaken in 2018 to reduce sediment and hold stormwater runoff from the nearby Kensington Club apartments. The rehabilitation project replaced the original detention basin, constructed in the mid-1970s, that had filled with sediment and woody vegetation. The Kensington Club Basin is an extended detention basin discharging to an unnamed tributary to the Conestoga River. The basin, though located within the City of Lancaster boundaries, is privately co-owned and maintained by the School District of Lancaster and Kensington Club Apartments. The basin was designed with a stormwater storage area, trash rack, concrete riser outlet structure, outlet pipe, vegetated buffer along the perimeter, and an armored emergency spillway.

Appendix A.MCM #5.BMP #3, requires the Township ensures, “Adequate O&M of all post-construction stormwater management BMPs that have been installed at development of 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to post construction stormwater management at the privately-owned Kensington Club Basin Rehabilitation Project.

- 1) Township representatives stated that they inspect the BMP approximately annually and may take pictures, but they do not generate a formal inspection report.
- 2) The EPA Inspection Team observed the primary inflow areas that convey stormwater to the basin (refer to [Photographs 6 through 8](#)). The basin was dry at the time of inspection.
- 3) The EPA Inspection Team observed the detention basin perimeter was adequately mowed. From what was visible, the structures within the basin appeared to be in good condition and no trash was observed (refer to [Photographs 9 and 10](#)). However, there was observed debris and sediment build up around the basin trash rack (refer to [Photograph 11](#)). There was no observed trash inside the outlet structure (refer to [Photograph 12](#)).
- 4) Stormwater is discharged from the stormwater basin, through the concrete riser outlet structure, through a low flow orifice, and to an unnamed tributary to the Conestoga River (refer to [Photograph 13](#)).

According to the Township representative, the basin is visually inspected by Township staff annually. However, these inspections by the Township had not been documented at the time of the site visit inspection.

Site No. 4: Springhouse Road Swale

Address/Location: 1630 Millersville Pike, Lancaster, PA 17603

Relevant MCM: Post Construction Stormwater Management

Entry Time: 10:55 AM (EDT)

Exit Time: 11:10 AM (EDT)

Table 4.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: According to the Township representative, the Springhouse Road swale, located on private land within the Township, collects stormwater runoff from the adjacent Springhouse Road. The swale was designed to collect the stormwater and filter the runoff, before slowly releasing it to an unnamed creek. The Township used funds from the Lancaster County Conservation District’s Low Volume Roads Program to regenerate this stormwater conveyance and construct check dams in the swale. The approximate installation date of the swale was not confirmed at the time of the inspection.

The property owner had not granted the Township a maintenance easement, so operation and maintenance of the swale is the responsibility of the property owner. The Township representative stated that the current property owner, who is different than the property owner when the work was done, started to remove the check dams in 2018 and 2019. The Township representative stated that the property owner’s actions resulted in enforcement actions between the owner and the Township regarding operation and maintenance.

Appendix A.MCM #5.BMP #3, requires the Township to ensure, “Adequate O&M of all post-construction stormwater management BMPs that have been installed at development of 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.”

Site Visit Observations: The EPA Inspection Team made the following observation related to post construction stormwater management at the Springhouse Road Swale.

- 1) The EPA Inspection Team observed that the Springhouse Road Swale had become channelized. The Township representative stated that the owner had made modifications to the swale starting in 2018-2019, reducing its efficiency. These modifications included walling off a portion of the swale to create a pond and removing the installed check dams designed to slow the stormwater flow (refer to Photographs 14 through 16).

Site No. 5: Chadwick Circle Detention Basin

Address/Location: 1637 Chadwick Cir, Lancaster, PA 17603

Relevant MCM: Post Construction Stormwater Management

Entry Time: 11:30 AM (EDT)

Exit Time: 11:40 AM (EDT)

Table 5.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: According to the Township representative, the Chadwick Circle detention basin receives stormwater from the adjacent roadway, Chadwick Circle, prior to discharging to an adjacent vegetated ravine. The basin, developed in 2017, is located on private land within the Township and is maintained by the private landowners.

Appendix A.MCM #5.BMP #3, requires the Township ensures, “Adequate O&M of all post-construction stormwater management BMPs that have been installed at development of 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to post construction stormwater management at the Chadwick Circle Detention Basin.

- 1) The EPA Inspection Team observed the basin forebay, inflow headwall, outflow headwall, and outlet pipe (refer to Photographs 17 through 20). The basin was mowed and largely free of trash and debris. However, the riprap in the forebay needed maintenance and replacement (refer to Photograph 21).

Site No. 6: Gable Park Basin

Address/Location: 1775 Wabank Rd, Lancaster, PA 17603

Relevant MCM: Post Construction Stormwater Management

Entry Time: 11:50 AM (EDT)

Exit Time: 12:00 PM (EDT)

Table 6.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Gable Park Basin was constructed to capture and filter stormwater from various locations including the Chadwick Circle Detention Basin and Springhouse Road Swale drainage areas. The basin is located within the Township on private land and includes a concrete dam and spillway that is operated and maintained by the Township. The Township representative stated that there had been ongoing discussions between the Township and the homeowner’s association (HOA) regarding maintenance and operation of the basin. The Township representative further stated that while no official operation and maintenance agreement was signed by the HOA, there was an understanding between the Township and the HOA, and the Township representative indicated that the HOA cleaned out the basin in 2021.

Appendix A.MCM #5.BMP #3, requires the Township to ensure, “Adequate O&M of all post-construction stormwater management BMPs that have been installed at development of 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.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Township’s post construction stormwater management at the Gable Park Basin.

- 1) The EPA Inspection Team observed the basin and outflow headwall (refer to Photograph 22). The basin’s principal outlet pipe was inundated with sediment and woody debris and needed maintenance (refer to Photograph 23).

Site No. 7: Southern Village Detention Basin

Address/Location: 107 Waypoint Dr, Lancaster, PA 17603

Relevant MCM: Post Construction Stormwater Management

Entry Time: 1:00 PM (EDT)

Exit Time: 1:05 PM (EDT)

Table 7.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Southern Village Detention Basin, located within the Township, was constructed in 2006 to capture and filter stormwater from the nearby streets of Wabank Road and Waypoint Drive prior to discharging into Fox Rill, a tributary of the Conestoga River. The basin is owned and maintained by the Southern Village HOA.

Appendix A.MCM #5.BMP #3, requires the Township 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, including projects less than one acre that are part of a larger common plan of development or sale.”

Site Visit Observations: The EPA Inspection Team made the following observations related to post construction stormwater management at the Southern Village Detention Basin.

- 1) The EPA Inspection Team observed the basin was mowed, largely free of trash, and appeared to be well maintained (refer to Photographs 24 through 27).

Site No. 8: Township Outfall #CR190

Address/Location: 1220 New Danville Pike, Lancaster, PA 17603

Relevant MCM: IDD&E

Entry Time: 1:20 PM (EDT)

Exit Time: 1:35 PM (EDT)

Table 8.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Township Outfall #CR190 is located within the Township, directly adjacent to the outfall for the City of Lancaster’s Wastewater Treatment Facility (WWTF). The Township representative stated that this outfall receives flow from Township priority areas Hawthorn Ridge and Sterling Place. The Kensington Club Basin also discharges through Outfall #CR190 to the Conestoga River.

Maps of the Township’s MS4 system are included in Appendix B, Exhibit 2.

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.”

Site Visit Observations: The EPA Inspection Team made the following observations related Township Outfall #CR190.

- 1) Outfall #CR190 is identified on the Township’s MS4 map, and there was no observed flow at the time of the inspection (refer to Photographs 28 and 29).

Site No. 9: Township Outfall #LC030

Address/Location: 1357 Meadowcreek Ln., Lancaster, PA 17603

Relevant MCM: IDD&E

Entry Time: 1:55 PM (EDT)

Exit Time: 2:00 PM (EDT)

Table 9.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Devon Groff	Township Public Works Superintendent
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: Outfall #LC030 is located on the Little Conestoga Creek, directly southwest of the Township Public Works Campus. The outfall receives stormwater runoff from the adjacent Public Works Campus.

Maps of the Township’s MS4 system are included in [Appendix B, Exhibit 2](#).

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.”

Site Visit Observations: The EPA Inspection Team made the following observation related to the Township’s Outfall # LC030.

- 1) Outfall #LC030 is identified on the Township’s MS4 map, and there were no observations of note with respect to the outfall (refer to [Photograph 30](#)).

Site No. 10: Township Public Works Campus

Address/Location: 1357 Meadowcreek Ln., Lancaster, PA 17603

Relevant MCM: Pollution Prevention / Good Housekeeping

Entry Time: 2:00 PM (EDT)

Exit Time: 2:50 PM (EDT)

Table 10.1. Site Visit Participants

Name	Title/Affiliation
Ben Webber	Township Engineer
Devon Groff	Township Public Works Superintendent
Shane McAleer	EPA Region III
Leah Staley	PADEP
Rob Naeser	Inspector, PG Environmental
Taylor Fontaine	Inspector, PG Environmental

Site Description: The Township Public Works Campus (hereinafter, Public Works Campus or Campus) consists of a salt storage building, a wood waste recycling center open to the public, an upper garage for vehicle maintenance, two lower garages (identified as “older” and “newer”), a parking lot, two aboveground fuel tanks (one 1,000-gallon diesel, one 500-gallon regular unleaded gasoline), and stored aggregate materials (e.g., stone, mulch, and dirt). Stormwater runoff from outdoor portions of the Public Works Campus is conveyed via four (4) drop inlets, each equipped with a filter bag, west towards Little Conestoga Creek.

Appendix A.MCM #6.BMP #2 requires the permittee to, “Develop, implement and maintain a written O&M program for all operations that could contribute to the discharge of pollutants from the regulated small MS4s, 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 your 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 disposal 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 contained in the PAG-03 General Permit for Stormwater Associated with Industrial Activity.
- Procedures for the proper disposal of waste, including dredge spoil, accumulated sediments, trash, household hazardous waste, used motor oil, street sweepings, and other debris.”

Site Visit Observations: The EPA Inspection Team made the following observations related to the Township’s pollution prevention and good housekeeping at the Public Works Campus.

- 1) The EPA Inspection Team observed the covered salt storage building located in the northern portion of the site (refer to [Photographs 31 and 32](#)). The building was enclosed on three sides. At the time of the inspection, there was a filter sock on the ground surrounding the exposed side and no materials were observed migrating from the building.
- 2) The EPA Inspection Team observed two aboveground fuel tanks (one 1,000-gallon diesel, one 500-gallon regular unleaded gasoline). The tanks were in good condition (refer to [Photograph 33](#)). The EPA Inspection Team did not observe spills or staining at the fuel tanks. Spill kits/materials were observed in the adjacent building.
- 3) The EPA Inspection Team observed several aggregate storage areas in the northern portion of the Public Works Campus at the wood waste recycling area. These aggregate piles contained dirt and crushed stone (refer to [Photographs 34 and 35](#)).
- 4) The EPA Inspection Team observed pesticides properly stored inside the upper garage in a cabinet (refer to [Photograph 36](#)).
- 5) The EPA Inspection Team observed a floor drain in the upper garage connected to an underground oil-water separator (OWS) which then conveys to the City of Lancaster’s sanitary sewer (refer to [Photograph 37](#)). Note that the Township does not own or operate a sanitary sewer.
- 6) The EPA observed the area in the upper garage used for servicing vehicles (e.g., oil changes), waste oil storage, and waste material storage (refer to [Photographs 38 and 39](#)).
- 7) The EPA Inspection Team observed the lower garages which are primarily used for vehicle and materials storage (refer to [Photograph 40](#)). These garages contain approximately two (2) floor drains, but Township representatives were unsure what the connections to these drains were, nor where these drains discharged (refer to [Photograph 41](#)). After the inspection, on March 28, the Township stated and provided documentation that they had capped the floor drains (refer to [Appendix B, Exhibit 3](#)).
- 8) The EPA Inspection Team observed a stormwater headwall and outlet pipe located in the southern portion of the Public Works Campus (refer to [Photographs 42 and 43](#)). Stormwater from the adjacent Public Works Campus roadways and parking lots is conveyed through this outlet pipe and into a vegetated area.
- 9) The EPA Inspection Team observed a steep slope between the upper garage and lower garages. The Township had placed mulch on the slope to assist with erosion and had staked filter socks at the toe of the slope. However, the filter socks were not installed correctly (e.g., sock ends were not overlapping, not staked at proper intervals, and the mulch was undercutting) (refer to [Photograph 44](#)). After the inspection, on March 28, the Township stated and provided documentation that they had further stabilized the filter socks (refer to [Appendix B, Exhibit 3](#)).

CLOSING CONFERENCE

The EPA Inspection Team conducted a brief closing conference with the Township Engineer and Township Public Works Superintendent at the Lancaster Township Municipal Office to share preliminary observations. The EPA Inspection Team reiterated to the Township representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team and 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 the additional review of materials following the inspection

The inspection concluded at approximately 3:15 p.m. (EDT).

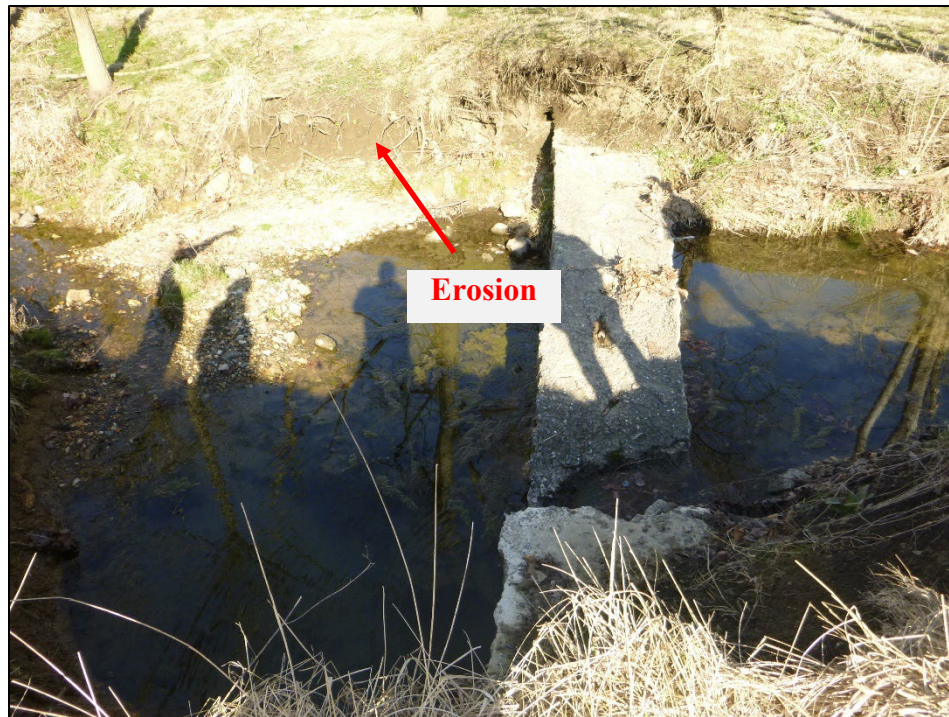
SITE VISIT PHOTOS



Photograph 1. Township Site for Potential Floodplain Restoration BMP: (DSCN2823) View, facing northeast, upstream of the site along Marietta Avenue. The pictured stormwater conveyance is located within the Pennsylvania Department of Transportation (PennDOT) right-of-way and is maintained by PennDOT.



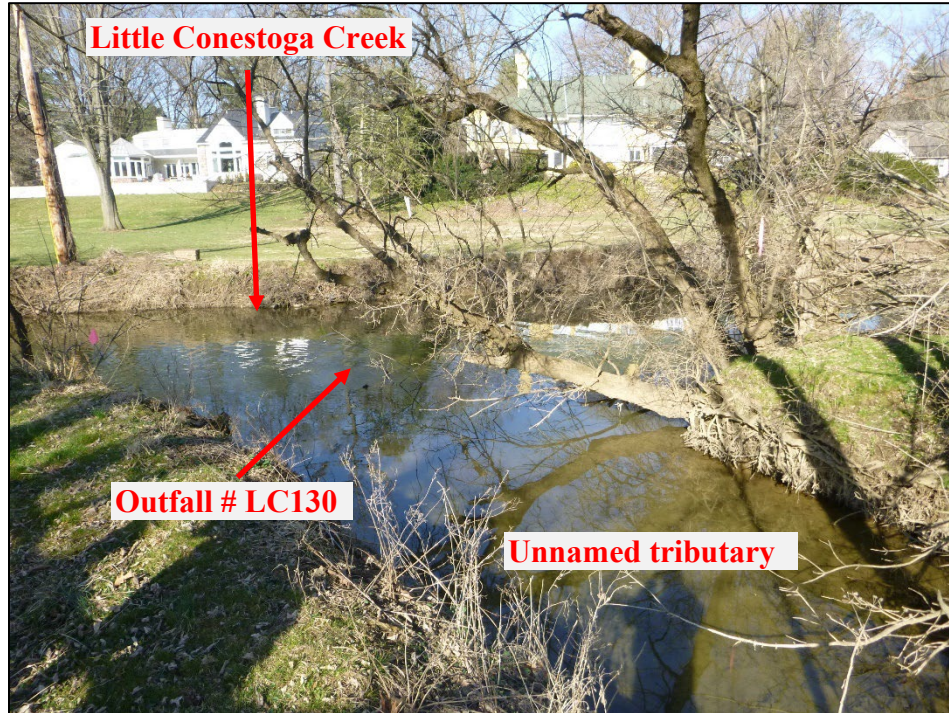
Photograph 2. Township Site for Potential Floodplain Restoration BMP: (DSCN2823) View, facing west, of observed streambank erosion that has exposed the adjacent tree roots.



Photograph 3. Site for Potential Floodplain Restoration BMP: (DSCN2828) View, facing north, of observed streambank erosion and an exposed concrete encasement for a sanitary sewer pipe.



Photograph 4. Site for Potential Floodplain Restoration BMP: (DSCN2829) Additional view of observed streambank erosion.



Photograph 5. Township MS4 Outfall # LC130: (DSCN2832) View of the approximate location for Township Outfall #LC130, located at the confluence of an unnamed tributary and Little Conestoga Creek.



Photograph 6. Kensington Club Basin Rehabilitation Project: (DSCN2835) View, facing west, of a drainage inflow area located west of the basin. Adjacent parking lots drain into the basin. Note the blue arrows indicating the directions of flow.



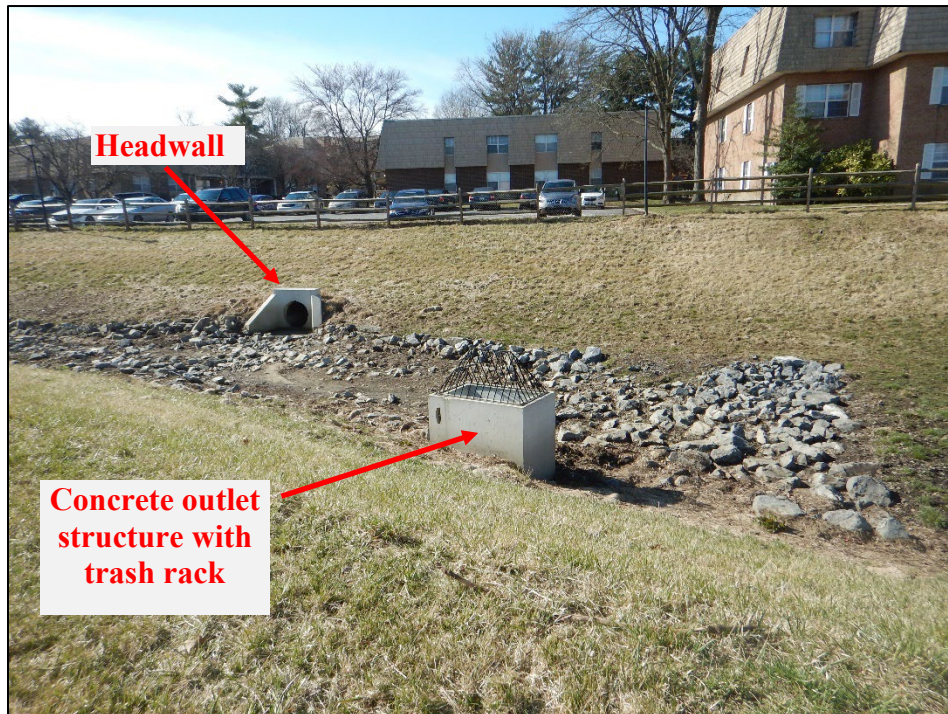
Photograph 7. Kensington Club Basin Rehabilitation Project: (DSCN2836) View, facing northeast, of the detention basin. Note the inflow headwall in the left side of the photo.



Photograph 8. Kensington Club Basin Rehabilitation Project: (DSCN2838) Closer view of the inflow headwall and pipe, as shown in Photograph 7. Note the blue arrow indicating the direction of flow.



Photograph 9. Kensington Club Basin Rehabilitation Project: (DSCN2840) Additional view, facing west, of the basin that was observed to be mowed and largely trash free at the time of the inspection.



Photograph 10. Kensington Club Basin Rehabilitation Project: (DSCN2842) View, facing south, of another inflow headwall and the basin's concrete outlet structure, equipped with a trash rack.



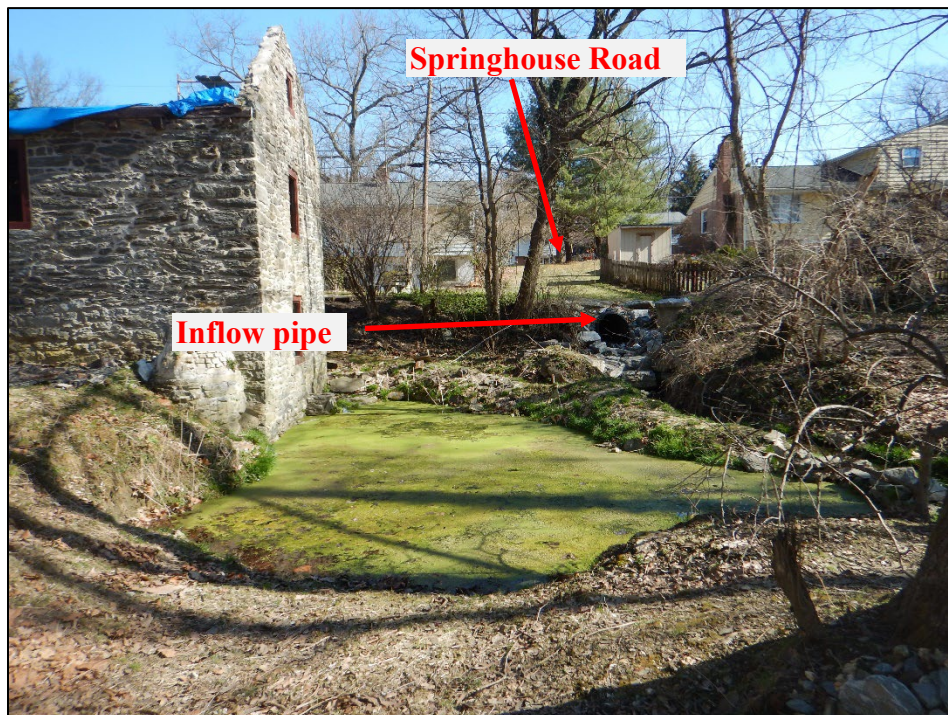
Photograph 11. Kensington Club Basin Rehabilitation Project: (DSCN2848) Closer view of the basin's concrete outlet structure, as shown in Photograph 10. The lowest outlet, behind the visible trash rack, was inundated with sediment and debris.



Photograph 12. Kensington Club Basin Rehabilitation Project: (DSCN2849) View inside the basin's concrete outlet structure as shown in Photographs 10 and 11. There was no observed trash inside the outlet structure, and the Township representative stated there were groundwater sources contributing to the observed flow.



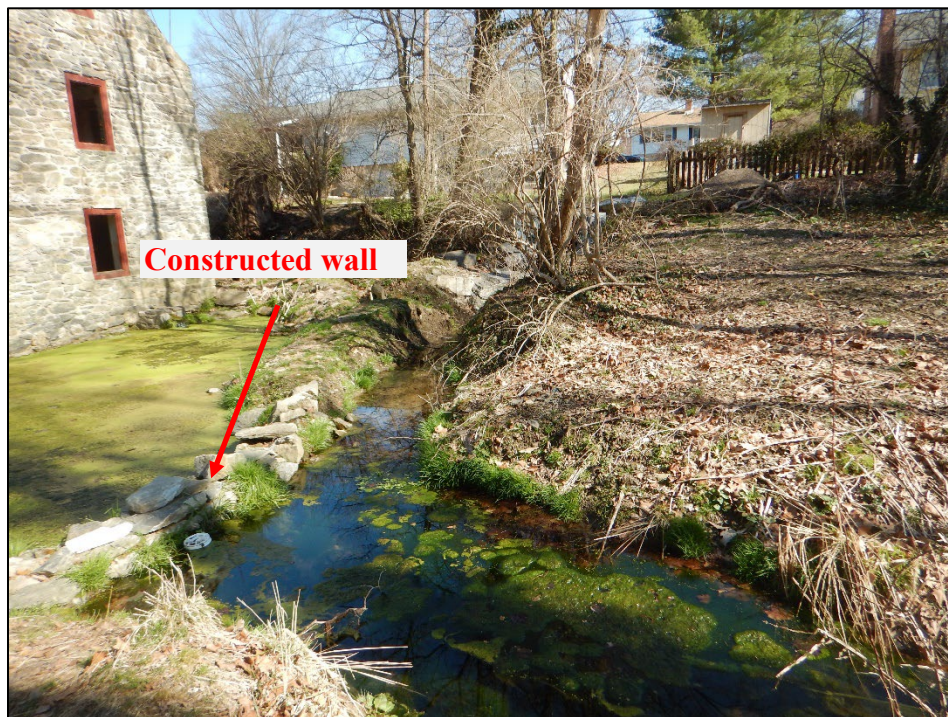
Photograph 13. Kensington Club Basin Rehabilitation Project: (DSCN2844) View, facing east, of the armored emergency spillway, basin outflow headwall, and drainage area towards an unnamed tributary to the Conestoga River.



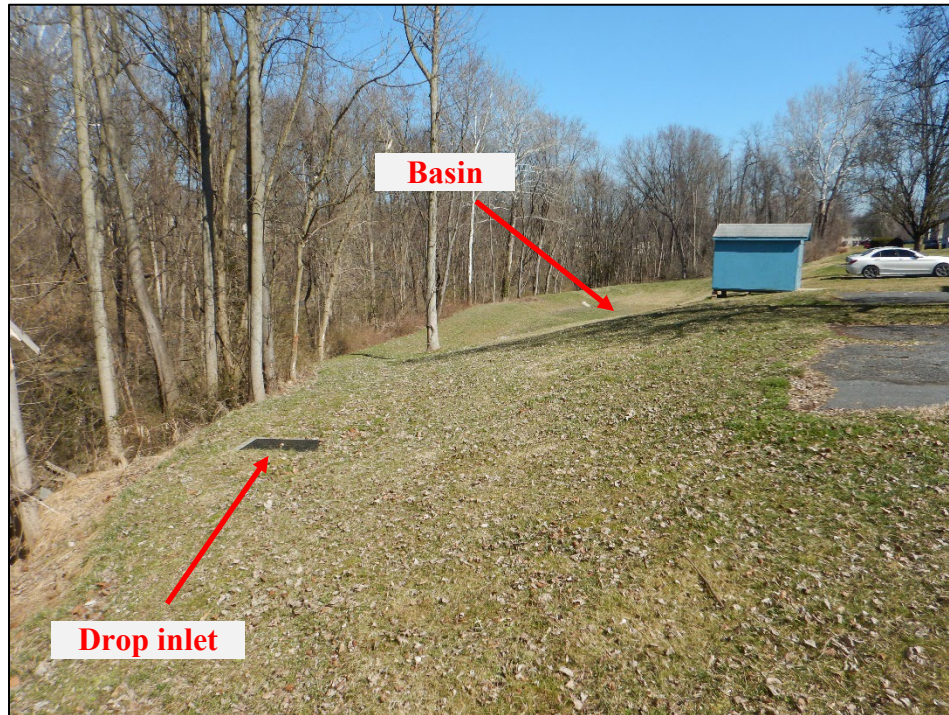
Photograph 14. Springhouse Road Swale: (DSCN2850) View, facing north, of the swale inflow pipe, channel, and proximity to Springhouse Road.



Photograph 15. Springhouse Road Swale: (P1060574) Closer view of the swale's inflow pipe and main channel, as shown in Photograph 14. Note the blue arrow indicating the direction of flow.



Photograph 16. Springhouse Road Swale: (DSCN2851) View, facing north, of where the owner of the land had removed stones installed for a check dam and walled off part of the swale, creating a pond.



Photograph 17. Chadwick Circle Detention Basin: (DSCN2861) View, facing northeast of a drop inlet that conveys stormwater to the shown basin.



Photograph 18. Chadwick Circle Detention Basin: (DSCN2864) View, facing northeast, of the basin. The basin was mowed and largely free of trash and debris. Note the yellow dotted lines indicating the approximate boundary of the basin.



Photograph 19. Chadwick Circle Detention Basin: (DSCN2869) View, facing northwest, of the outflow headwall that conveys stormwater to an adjacent vegetated ravine. Note the blue arrow indicating the direction of flow.



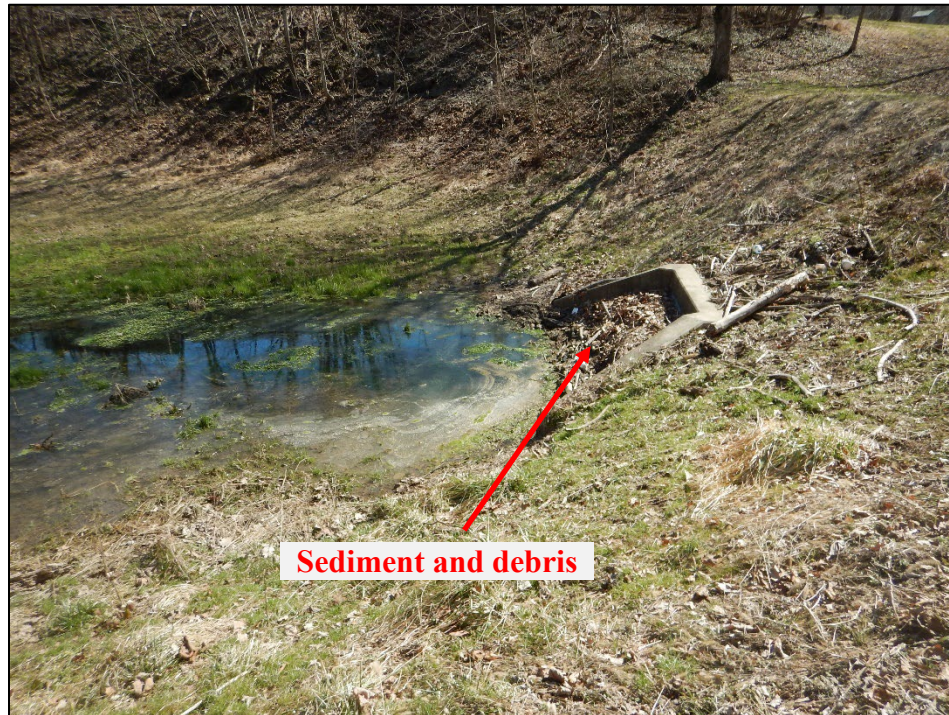
Photograph 20. Chadwick Circle Detention Basin: (DSCN2873) View of the basin's outlet pipe that conveys stormwater to a vegetated ravine that flows into the Gable Park Basin.



Photograph 21. Chadwick Circle Detention Basin: (DSCN2866) View, facing southwest, of the basin inflow headwall. The riprap in the forebay needed maintenance and replacement. Note the blue arrow indicating the direction of flow.



Photograph 22. Gable Park Basin: (P1060586) View, facing north, of the basin that receives stormwater from the Chadwick Circle Detention Basin and Springhouse Road Swale drainage areas.



Photograph 23. Gable Park Basin: (DSCN2880) View, facing east, of the basin's outflow headwall and outlet pipe that were inundated with sediment and woody debris, and needed maintenance.



Photograph 24. Southern Village Detention Basin: (DSCN2881) View, facing southwest, of a drop inlet located on Waypoint Dr. that conveys stormwater to the basin.



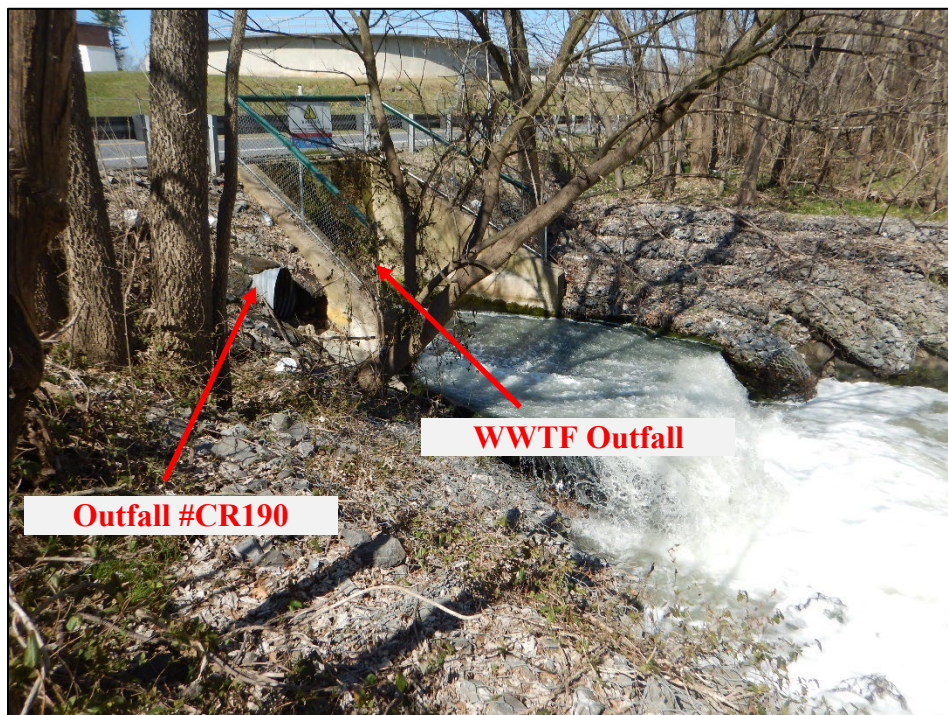
Photograph 25. Southern Village Detention Basin: (DSCN2885) View, facing northwest, of the detention basin and concrete outlet structure. The basin appeared to be well maintained.



Photograph 26. Southern Village Detention Basin: (DSCN2888) View inside the basin's outlet structure, as shown in Photograph 25. There was no observed trash or flow at the time of the inspection.



Photograph 27. Southern Village Detention Basin: (DSCN2890) View of the basin’s outflow headwall and drainage area that conveys stormwater to an unnamed tributary of the Conestoga River. Note the blue arrow indicating the direction of flow.



Photograph 28. Township Outfall #CR190: (DSCN2895) View, facing west, of Township Outfall #CR190 to the Conestoga River. Note the location of the outfall directly adjacent to the outfall for the City of Lancaster’s WWTF.



Photograph 29. Township Outfall #CR190: (DSCN2898) View, facing east, of the drainage area for the outfall into the Conestoga River.



Photograph 30. Township Outfall #LC030: (DSCN2906) View, facing west, of the approximate location for Township Outfall #LC030 located west of the Township Public Works Campus.



Photograph 31. Township Public Works Campus: (DSCN 2910) View, facing north, of the Campus's salt storage building, attached to the upper garage. The building was enclosed on three sides and had a filter sock placed along the open side. There was no observed salt migration from the building from the building. Note the Campus' brine storage on the right side.



Photograph 32. Township Public Works Campus: (DSCN 2911) Closer view of the salt storage building and filter sock, as shown in Photograph 31.



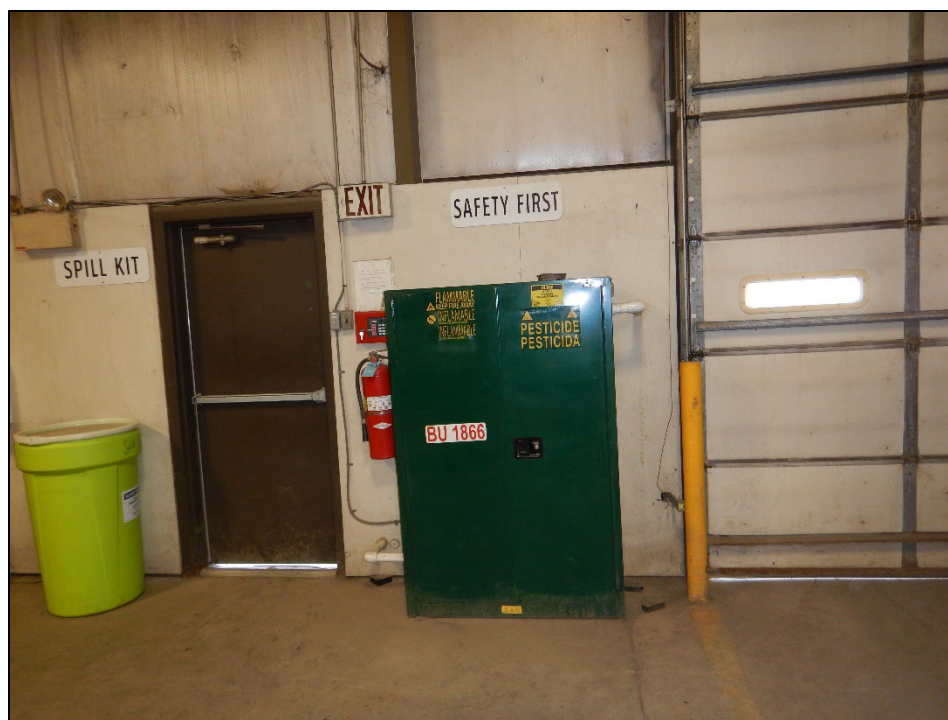
Photograph 33. Township Public Works Campus: (DSCN2909) View, facing northwest, of the two aboveground fuel tanks (one 1,000-gallon diesel, one regular 500-gallon unleaded gasoline). The EPA Inspection Team observed spill kits in the adjacent building.



Photograph 34. Township Public Works Campus: (DSCN2914) View, facing northwest, of the Township's wood waste recycling center that also serves as material and aggregate storage.



Photograph 35. Township Public Works Campus: (DSCN2917) View, facing north, of the materials and aggregate storage mostly consisting of gravel and dirt.



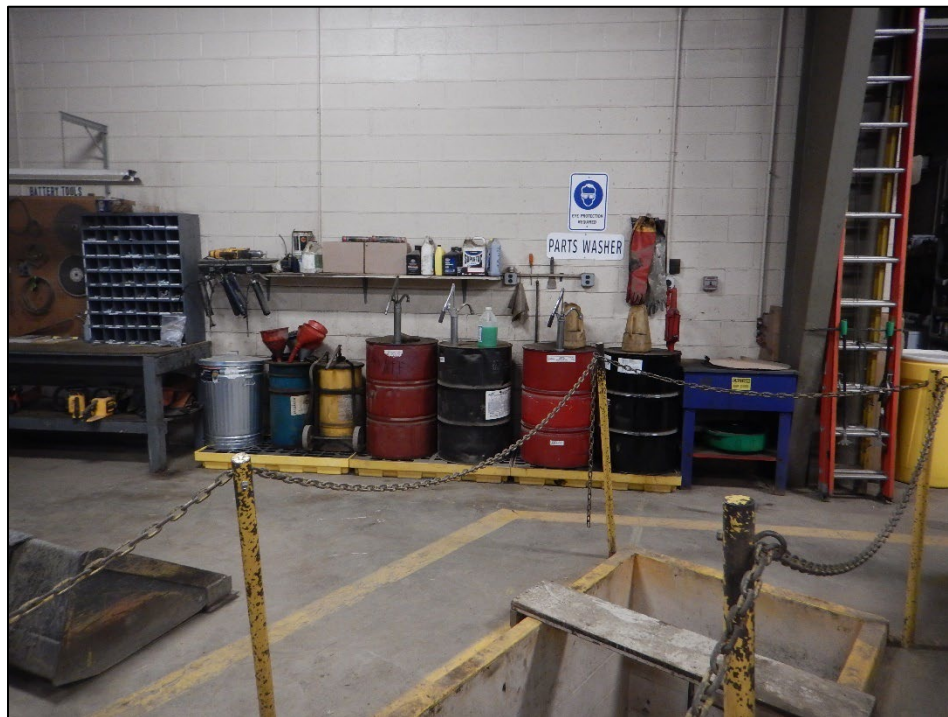
Photograph 36. Township Public Works Campus: (DSCN2920) View of pesticide storage inside the upper garage.



Photograph 37. Township Public Works Campus: (DSCN2921) View, inside the upper garage, of a floor drain connected to an underground OWS which then conveys to the City of Lancaster’s sanitary sewer.



Photograph 38. Township Public Works Campus: (DSCN2922) View, inside the upper garage, of the fluid draining pit that the Public Works staff use for servicing vehicles. There were no drains in the pit.



Photograph 39. Township Public Works Campus: (DSCN2922) View, inside the upper garage, of waste oil storage barrels stored on spill pallets.



Photograph 40. Township Public Works Campus: (P1060610) View, facing west, of the lower garages at the Campus primarily used for vehicle and materials storage.



Photograph 41. Township Public Works Campus: (DSCN2934) View of one of the two (2) floor drains located in the lower garage. At the time of the inspection, Township representatives were unsure as to what these drains were connected to.



Photograph 42. Township Public Works Campus: (P1060613) View, facing north, of the stormwater headwall and outlet pipe that receives stormwater flow from the adjacent Campus parking lots/roads. Stormwater flows from this outlet pipe into a vegetated area.



Photograph 43. Township Public Works Campus: (P1010614) View of a drop inlet with filter insert located in the parking area for the Campus. Stormwater conveys through the inlet and out the headwall, as shown in Photograph 42.



Photograph 44. Township Public Works Campus: (DSCN2938) View, facing north, of the steep slope in between the upper garage and lower garages. The Township had placed mulch on the slope to assist with erosion and had staked filter socks at the toe. However, the mulch was undercutting the filter sock, which was also not staked.