U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Antrim Township
Facility Address: 10655 Antrim Church Road, Greencastle, PA 17225
Mailing Address: 10655 Antrim Church Road, Greencastle, PA 17225

Report Prepared on: 5/11/2022
Date

By: Taylor Fontaine,
Taylor Fontaine, Environmental Scientist
(PG Environmental, EPA Contractor)

Report Final as of: 5/13/2022
Date

By: JESSICA DUFFY Digitally signed by JESSICA DUFFY Date: 2022.05.13 14:06:32 -04'00',
Jessica Duffy, Acting Chief, NPDES Section
(EPA)

General Information

Type of Inspection:	MS4 Compliance Inspection
Owner:	Antrim Township
Operators:	Antrim Township
Permittee:	Antrim Township
NPDES Permit No:	PAI133536
NPDES Permit Effective Date:	July 1, 2018
NPDES Permit Expiration Date:	June 30, 2023
Receiving Water(s) and/or MS4:	Paddy Run and unnamed tributaries to: Muddy Run, Paddy Run, Conococheague Creek, and Marsh Run.
Latitude and Longitude:	39.790149 ° N, -77.711270 ° W

On-Site Facility Site Visits Overview

On March 17, 2022, EPA contractors from PG Environmental and ERG, (hereinafter, EPA Inspection Team) conducted site visit inspections of multiple locations that discharge to the Antrim Township, Pennsylvania (hereinafter, "Township" or "Permittee") Municipal Separate Storm Sewer System (MS4). These in-person site visits complement an EPA offsite compliance review of the Township's MS4 program conducted February 22 – 24, 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) Individual Permit (IP) to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. PAI133536; hereinafter, the "Permit"). A copy of the Permit is provided in Appendix A.

Approximate Entry Time: 8:30 AM (EDT) **Approximate Exit Time**: 1:30 PM (EDT)

Unique Project Identifier (UPI): 3E22WN055A

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INTRODUCTION

On March 17, 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 the Township Municipal Building, three (3) privately owned and operated post-construction best management practices (BMPs), four (4) Township MS4 outfalls, one (1) location previously considered to be an outfall, and two (2) Township-owned and operated lift stations.

INSPECTION PROCESS

INSPECTION OPENING CONFERENCE

The EPA Inspection Team arrived at the Antrim Township Municipal Building at 8:30 a.m. (EDT) for the field 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 February 22 – 24, 2022. Table 1 describes the individuals that participated in the inspection. A copy of the inspection sign-in sheet is included in the Exhibit Log in 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
Kelly Davis, Inspector	ERG	(703) 633-1646	kelly.davis@erg.com
Township Representatives			
Amber King-Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer	(717) 597-3818 ext 106	areasner@twp.antrim.pa.us
Sylvia House	Zoning Officer	(717) 597-3818 ext 124	shouse@twp.antrim.pa.us
Rodney Eberly	Road Master	Not provided	Not provided
State or County Representatives			
Leah Staley	Pennsylvania Department of Environmental Protection (PADEP)	(717) 705-4814	lestaley@pa.gov

WEATHER AND PRECIPITATION

During the inspection, it was cloudy with light rain and temperatures averaging approximately 50 degrees Fahrenheit. National Oceanic and Atmospheric Administration (NOAA) National Weather

Service precipitation data for the date of the inspection and seven days prior are provided in the table below.

Table 2. Total Precipitation Preceding Inspection

Station Name	Date	Precipitation Amount (inches)[1]
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 10, 2022	0.26
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 11, 2022	0.0
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 12, 2022	0.11
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 13, 2022	0.0
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 14, 2022	0.0
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 15, 2022	0.0
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 16, 2022	0.0
GREENCASTLE 0.3 SSE, PA US US1PAFN0001	March 17, 2022	0.08

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

SITE VISIT OBSERVATIONS

Site No. 1: Township Municipal Building

Address/Location: 10655 Antrim Church Road, Greencastle, PA 17225
Relevant Minimum Control Measure (MCM): Pollution Prevention / Good Housekeeping
Entry Time: 8:50 AM (EDT)
Exit Time: 9:50 AM (EDT)

Table 1.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Rodney Eberly	Road Master
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: The Township Municipal Building (hereinafter, "Municipal Building") comprises offices, a salt and sand storage garage, an outdoor aggregate stockpile storage area, a recycling collection area, a 500-gallon aboveground gas tank, a 1,500-gallon aboveground diesel tank, a 200-gallon aboveground used oil tank, a garage for vehicle maintenance and tools storage, two garages for truck and equipment storage, one garage for vehicle washing, an oil/water separator, a parking lot, and a loading dock. The south area of the Municipal Building property includes the salt and sand storage garage, the outdoor aggregate stockpile storage area, the recycling collection area, part of the parking lot, and the aboveground tanks. The north area of the Municipal Building includes the offices, the garages, the oil/water separator, the rest of the parking lot, and the loading dock. Stormwater runoff from the southern portion of the property runs off into the adjacent roadway. Stormwater runoff from the northern portion of the property discharges into drains in the loading dock that lead to the oil/water separator and then the sanitary sewer system. The garage for vehicle maintenance drains directly into the sanitary sewer system. The two garages for truck and equipment storage and the garage for vehicle washing both drain to the oil/grit separator before discharging into the sanitary sewer system.

Permit Part C.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 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 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 NPDES Permit for Stormwater Discharges 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 Municipal Building.

1) Salt and sand were stored entirely under cover in a storage garage in the Municipal Building's south area (refer to Photographs 1 and 2). Township representatives stated that the road crew salts the roads when necessary.
2) Aggregate piles in the outdoor aggregate stockpile storage area were not located within barriers and there were no observed containment measures (refer to Photographs 3 through 5). Township representatives stated that the piles were used for road maintenance.
3) The recycling area appeared to be free of trash or debris (refer to Photograph 6). The area accepts cardboard, cans, plastic, and paper. Recyclables gathered in the covered dumpsters are removed every week.
4) The aboveground 500-gallon gas tank, 1,500-gallon gas tank, and 200-gallon used oil tank were uncovered, but Township representatives stated that the tanks were double-walled (refer to Photographs 7 and 8). No stains were observed around the tanks. Township representatives stated that the municipal vehicles are fueled using the gas and diesel tanks. Township representatives also stated that used oil from municipal vehicles kept in the 200-gallon tank is emptied at least once every two weeks. A spill kit was observed in the vehicle maintenance garage in the Municipal Building close to the tanks (refer to Photographs 9 and 10).
5) The vehicle maintenance garage appeared to be in good condition and not exposed to stormwater. Township representatives stated the drain in the garage discharges directly to the sanitary sewer system (refer to Photograph 11). Township representatives stated that all vehicle maintenance except for changing engines is performed in the garage. Township representatives also stated that changed vehicle batteries are not stored in the garage.
6) The two truck and equipment storage garages appeared to be in good condition. Township representatives stated the drains in both garages lead to the oil/water separator before discharging into the sanitary sewer system (refer to Photographs 12, 13, and 16).
7) The vehicle wash garage appeared to be in good condition. The drain in the wash garage leads to the oil/water separator before discharging into the sanitary sewer system (refer to Photographs 14 and 15).
8) Drains in the loading dock appeared to be clean and free of debris. The drains also lead to the oil/water separator before discharging into the sanitary sewer system (refer to Photographs 17 and 18).

Site No. 2: Vehicle Facility Yard
Address/Location: 39.795438, -77.707881
Relevant MCMs: Illicit Discharge Detection and Elimination / Post Construction Stormwater Management
Entry Time: 10:00 AM (EDT)
Exit Time: 10:30 AM (EDT)

Table 2.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: One outfall and three post-construction stormwater basins were located on the property of a privately-owned vehicle facility. According to Township representatives, the outfall receives stormwater via sheet flow and not a piped discharge, and they no longer classified the location as an MS4 outfall. The Township reevaluated their outfalls and mapping in 2019 when they hired Dewberry to assist with their MS4 program management. At that point, the approximate number of outfalls changed from 132 to 23. The outfall is located on the property's mid-northern perimeter. The outfall discharges into an unnamed tributary to Conococheague Creek. The stormwater basins are owned and maintained by the vehicle facility. Stormwater in the southeast area is captured by the first stormwater basin or sheet flows from the field north of the first stormwater basin to the outfall. Stormwater in the northwest area is captured by the second and third stormwater basins. Stormwater from the vehicle facility's parking lot located south and west of the stormwater basins sheet flows into the stormwater basins. The second stormwater basin is located south of the third stormwater basin. The second stormwater basin's overflow spillway flows into the third stormwater basin. The third stormwater basin's overflow spillway discharges into an unnamed tributary to Conococheague Creek. Township representatives stated that the stormwater basins were designed for a 100-year, 24-hour storm, and stormwater had never overflowed from the basins as of the time of the inspection.

A map of the Township's MS4 system is included in Appendix B, Exhibit 2.

Part A.II of the Permit defines an outfall as, "…a point source as defined by 40 CFR § 122.2 at the point where a municipal separate storm sewer discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(9))"

Permit Part C.MCM #3.BMP #1 states that the Township, "shall 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.
- Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.
- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- Procedures for eliminating an illicit discharge.
- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.
- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
- Procedures for addressing information or complaints received from the public."

Permit Part C.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 outfall and stormwater basins.

1) The first stormwater basin appeared well maintained and lacked debris or trash (refer to Photograph 19).
2) The EPA Inspection Team did not observe any stormwater discharge at the outfall into an unnamed tributary to Conococheague Creek during the inspection (refer to Photographs 20 through 22). Township representatives stated that the unnamed tributary experiences intermittent flow during wet weather.
3) The second and third stormwater basins' overflow spillways appeared to require maintenance, specifically the removal of vegetation (refer to Photograph 23 through 29).
4) The Township representatives stated that the outfall discharges sheet flow from the field south of the outfall into the unnamed tributary to Conococheague Creek. The location is a point source discharge into a surface water, and therefore would potentially be considered to be an outfall.

Site No. 3: Lift Station #3 Grindstone Hill Road (Ryan Lane) Pump Station
Address/Location: 39.78867, -77.70254
Relevant MCM: Pollution Prevention / Good Housekeeping
Entry Time: 10:34 AM (EDT)
Exit Time: 10:50 AM (EDT)

Table 3.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: Lift Station #3 Grindstone Hill Road (Ryan Lane) Pump Station collects sewage from neighborhoods southeast of the lift station and pumps it to a lift station northwest of Lift Station #3. Township representatives identified this lift station as a Township-owned and operated facility with the potential to generate stormwater runoff in the document "Identification of Township Facilities" (refer to Appendix B, Exhibit 3). Township representatives stated that the lift station receives maintenance as needed by contractors who remove waste via vacuum trucks. The lift station is equipped with an alarm system that notifies Township representatives when the lift station requires maintenance or in the event of a potential overflow. Township representatives stated that maintenance is attended to immediately and no major spills or problems had occurred as of the time of the inspection.

Permit Part C.MCM #6.BMP #1 requires the Township to, "Identify and document all operations that are owned or operated by the permittee and have the potential for generating pollution in stormwater runoff to the regulated small MS4. This includes activities conducted by contractors for the permittee. Activities may include the following: street sweeping; snow removal/deicing; inlet/outfall cleaning; lawn/grounds care; general storm sewer system inspections and maintenance/repairs; park and open space maintenance; municipal building maintenance; new construction and land disturbances; right-of-way maintenance; vehicle operation, fueling, washing and maintenance; and material transfer operations, including leaf/yard debris pickup and disposal procedures. Facilities can include streets; roads; highways; parking lots and other large paved surfaces; maintenance and storage yards; waste transfer stations; parks; fleet or maintenance shops; wastewater treatment plants; stormwater conveyances (open and closed pipe); riparian buffers; and stormwater storage or treatment units (e.g., basins, infiltration/filtering structures, constructed wetlands, etc.).

> (1) New permittees shall create an inventory of all operations and land uses that may contribute to pollution in stormwater runoff within areas of operations that discharge to the regulated small MS4 by the end of the first year of permit coverage, and review and update the inventory annually thereafter.
> (2) All permittees must review and update the inventory each year of permit coverage, as necessary."

Site Visit Observations: The EPA Inspection Team made the following observation related to Lift Station #3 Grindstone Hill Road (Ryan Lane) Pump Station.

1) The lift station appeared to be in good condition and at the time of the inspection was not experiencing any problems (refer to Photographs 30 and 31).

Site No. 4: Outfalls #0240 & #0245 Jason Drive
Address/Location: 39.777092, -77.740264
Relevant MCM: Illicit Discharge Detection and Elimination
Entry Time: 10:54 AM (EDT)
Exit Time: 11:00 AM (EDT)

Table 4.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: Outfalls #0240 and #0245 were located on Jason Drive. The outfalls were located on either side of Jason Drive at the entrance and exit of a culvert. The outfalls collect stormwater from Jason Drive and convey the stormwater to Paddy Run, a tributary to Conococheague Creek.

A map of the Township's MS4 system is included in Appendix B, Exhibit 2.

Permit Part C.MCM #3.BMP #1 states that the Township, "shall 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.
- Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.
- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- Procedures for eliminating an illicit discharge.
- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.
- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
- Procedures for addressing information or complaints received from the public."

Site Visit Observations: The EPA Inspection Team made the following observations related to Outfalls #0240 and #0245.

1) Stormwater flow was not observed at the outfalls at the time of the inspection (refer to Photographs 32 through 35). Runoff from neighboring private properties' yards contribute to Paddy Run upgradient of the outfalls. Paddy Run's channel is maintained by the owners of the adjacent private properties. Vegetation was growing inside the channel. The Township representatives stated that the Township did not have a formal agreement with the owners to maintain the channels.
2) Outfall #0245 appeared to be in good condition and was free of sediment and debris. Sediment and debris were observed at Outfall #0240 (refer to Photograph 33). Township representatives stated that the road crew is responsible for cleaning out the culvert that connects Outfalls #0245 and #0240. Township representatives did not specify the frequency in which the culvert is serviced.

Site No. 5: Lift Station #21 Jason Drive Pump Station
Address/Location: 39.77672, -77.74252
Relevant MCM: Pollution Prevention / Good Housekeeping
Entry Time: 11:00 AM (EDT)
Exit Time: 11:15 AM (EDT)

Table 5.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: Lift Station #21 Jason Drive Pump Station is located off Jason Drive. The lift station receives sewage from the Jason Drive neighborhood development. Township representatives identified this lift station as a Township-owned and operated facility with the potential to generate stormwater runoff in the document "Identification of Township Facilities" (refer to Appendix B, Exhibit 3).

Site Visit Observations: The EPA Inspection Team made the following observations related to the Lift Station #21 Jason Drive Pump Station.

1) Lift Station #21 appeared to be in good condition, and at the time of the inspection was not experiencing any problems (refer to Photographs 36 and 37).

Site No. 6: Outfall #0250 Nicole Drive
Address/Location: 39.77867, -77.73898
Relevant MCM: Illicit Discharge Detection and Elimination
Entry Time: 11:22 AM (EDT)
Exit Time: 11:30 AM (EDT)

Table 6.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: According to Township representatives, Outfall #0250 does not discharge runoff to waters of the U.S. The EPA Inspection Team observed that Outfall #0250 discharges to a stormwater basin not connected to any surface waters. Township representatives stated they no longer classified the location as an MS4 outfall. The Township reevaluated their outfalls and mapping in 2019 when they hired Dewberry to assist with their MS4 program management. At that point, the number of outfalls changed from 132 to 23. Outfall #0250 Nicole Drive is located off Briarbend Way. Runoff from the "outfall" discharges from Briarbend Way and a private yard into a storm drain inlet. The storm drain inlet is owned and maintained by the Pennsylvania Department of Transportation (PennDOT). Stormwater from the storm drain inlet drains into a stormwater basin that is also maintained by PennDOT. The outlet from the stormwater basin discharges into private stormwater basins located by the Lift Station #21 Jason Drive Pump Station. Township representatives were not sure whether the private property owner that owns the stormwater basins also maintains the basins, or it is the responsibility of the homeowner's association.

Part A.II of the Permit defines an outfall as, "…a point source as defined by 40 CFR § 122.2 at the point where a municipal separate storm sewer discharges to surface waters and does not include open conveyances connecting two municipal separate storm sewers, or pipes, tunnels or other conveyances which connect segments of the same stream or other surface waters and are used to convey surface waters. (25 Pa. Code § 92a.32(a) and 40 CFR § 122.26(b)(9))"

Permit Part C.MCM #3.BMP #1 states that the Township, "shall 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.
- Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.

- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- Procedures for eliminating an illicit discharge.
- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.
- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
- Procedures for addressing information or complaints received from the public."

Site Visit Observations: The EPA Inspection Team made the following observations related to Outfall #0250.

1) The storm drain Outfall #0250 appeared to be in good condition and did not have debris or trash (refer to Photograph 38).
2) The inlets in the stormwater basin that receives discharge from Outfall #0250 were free of sediment, debris, and trash (refer to Photograph 39 and 40).
3) All stormwater basins did not appear to connect to waters of the U.S. and therefore this "outfall" location would potentially not qualify as an outfall.

Site No. 7: Outfall #0130 East Weaver Road
Address/Location: 39.75336, -77.76136
Relevant MCM: Illicit Discharge Detection and Elimination
Entry Time: 11:36 AM (EDT)
Exit Time: 11:45 AM (EDT)

Table 7.1 Site Visit Participants

Name	Title/Affiliation
Amber Reasner	Assistant Zoning Officer/Assistant Code Enforcement Officer
Sylvia House	Zoning Officer
Leah Staley	PADEP
Taylor Fontaine	Inspector, PG Environmental
Rob Naeser	Inspector, PG Environmental
Kelly Davis	Inspector, ERG

Site Description: Outfall #0130 East Weaver Road is located off East Weaver Road. It receives runoff from East Weaver Road and discharges into an unnamed tributary to Conococheague Creek.

Permit Part C.MCM #3.BMP #1 states that the Township, "shall 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.
- Procedures for screening outfalls in priority areas. The program shall include dry weather field screening of outfalls for non-stormwater flows, and sampling of dry weather discharges for selected chemical and biological parameters. Test results shall be used as indicators of possible discharge sources.
- Procedures for identifying the source of an illicit discharge when a contaminated flow is detected at a regulated small MS4 outfall.
- Procedures for eliminating an illicit discharge.
- Procedures for assessing the potential for illicit discharges caused by the interaction of sewage disposal systems (e.g., on-lot septic systems, sanitary piping) with storm drain systems.
- Mechanisms for gaining access to private property to inspect outfalls (e.g., land easements, consent agreements, search warrants) and for investigating illicit connections and discharges.
- Procedures for program documentation, evaluation and assessment. Records shall be kept of all outfall inspections, flows observed, results of field screening and testing, and other follow-up investigation and corrective action work performed under this program.
- Procedures for addressing information or complaints received from the public."

Site Visit Observations: The EPA Inspection Team made the following observations related to Outfall #0130 East Weaver Road.

1) Outfall #0130 appeared to be free of sediment and debris (refer to Photographs 41 and 42). The outfall discharges into an unnamed tributary to Conococheague Creek.

CLOSING CONFERENCE

The EPA Inspection Team conducted a closing conference with the Township representatives 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 1:30 p.m. (EDT).

SITE VISIT PHOTOS

Photograph 1. **Township Municipal Building:** (DSCN3633.JPG) View, facing west, of the salt and sand storage garage in the Municipal Building.

Photograph 2. **Township Municipal Building:** (DSCN3637.JPG) View, facing west, of a mixture of salt and sand stored under cover in a garage in the Municipal Building.

Photograph 3. **Township Municipal Building:** (DSCN3639.JPG) View, facing south, of aggregate material stored in the southern area of the Municipal Building. The aggregate material did not have containment measures or covers at the time of the inspection.

Photograph 4. **Township Municipal Building:** (DSCN3640.JPG) View, facing north, of aggregate material stored in the southern area of the Municipal Building, as shown in Photograph 3.

Photograph 5. **Township Municipal Building:** (DSCN3641.JPG) View, facing east, of aggregate material stored in the southern area of the Municipal Building, as shown in Photographs 3 and 4.

Photograph 6. **Township Municipal Building:** (DSCN3642.JPG) View, facing south, of the recycling collection area in the southern area of the Municipal Building.

Photograph 7. **Township Municipal Building:** (DSCN3643.JPG) View, facing west, of the aboveground 500-gallon gas and 1,500-gallon diesel aboveground storage tanks (ASTs). Township representatives stated that they are double-walled.

Photograph 8. **Township Municipal Building:** (DSCN2954.JPG) View, facing north, of the aboveground 200-gallon used oil tank. Township representatives stated that it is double-walled.

Photograph 9. **Township Municipal Building:** (DSCN3646.JPG) View of the spill kit located inside the vehicle maintenance garage in the Municipal Building, adjacent to the ASTs.

Photograph 10. **Township Municipal Building:** (DSCN2955.JPG) View inside the spill kit located in the vehicle maintenance garage in the Municipal Building.

Photograph 11. **Township Municipal Building:** (DSCN3650.JPG) View of a drain in the vehicle maintenance garage in the Municipal Building. The drain leads to the sanitary sewer system.

Photograph 12. **Township Municipal Building:** (DSCN2962.JPG) View of a drain in the first truck and equipment storage garage. The drain leads to the oil/water separator before discharging to the sanitary sewer system.

Photograph 13. **Township Municipal Building:** (DSCN3665.JPG) View of a drain in the second vehicle and equipment storage garage. The drain leads to the oil/water separator before discharging to the sanitary sewer system.

Photograph 14. **Township Municipal Building:** (DSCN3655.JPG) View inside the vehicle wash garage in the Municipal Building. Note the drain that leads to the oil/water separator.

Photograph 15. **Township Municipal Building:** (DSCN3657.JPG) Closer view of the drain in the vehicle wash garage in the Municipal Building, as shown in Photograph 14.

Photograph 16. **Township Municipal Building:** (DSCN3658.JPG) View of the oil/water separator access outside of the Main Building.

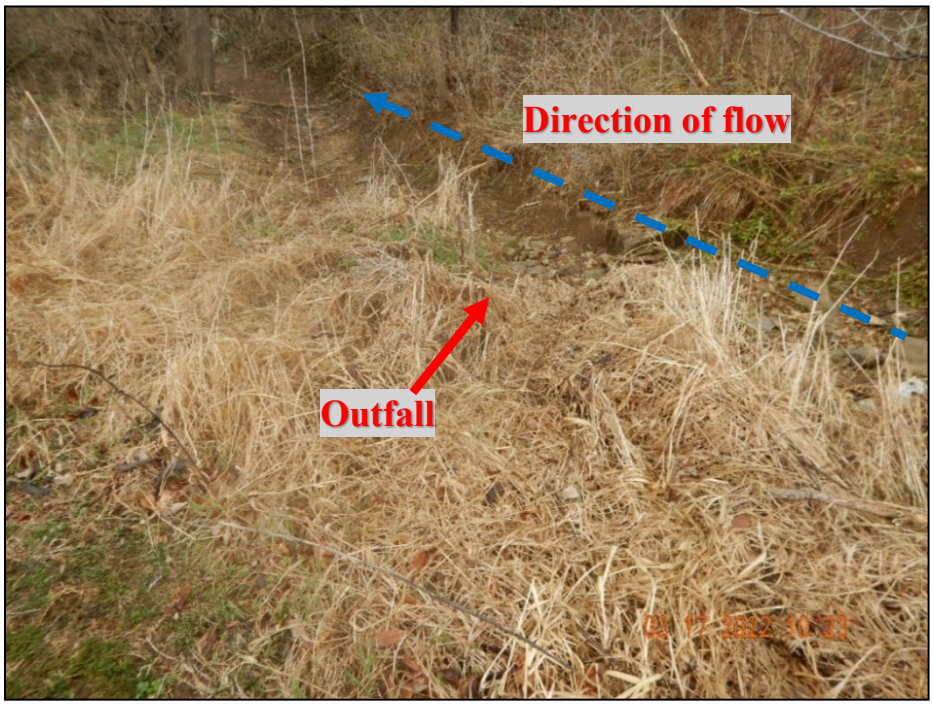
Photograph 17. **Township Municipal Building:** (DSCN3661.JPG) View, facing south, of drains outside of the vehicle storage garages in the Municipal Building. The drains convey stormwater to the oil/water separator and then to the sanitary sewer.

Photograph 18. **Township Municipal Building:** (DSCN3663.JPG) View inside one of the drains outside of the vehicle storage garages in the Municipal Building.

Photograph 19. **Vehicle Facility Yard:** (DSCN3669.JPG) View, facing west, of the first post-construction stormwater basin. The basin is owned and maintained by the owners of the private vehicle facility south of the basin.

Photograph 20. **Vehicle Facility Yard:** (DSCN3670.JPG) View, facing west, downstream of the outfall near the vehicle facility.

Photograph 21. **Vehicle Facility Yard:** (DSCN3671.JPG) View, facing east, upstream of the outfall near the vehicle facility. Stormwater flows north to south in the unnamed tributary to Conococheague Creek.



Photograph 22. **Vehicle Facility Yard:** (DSCN3673.JPG) View, facing north, of the approximate location for the outfall by the vehicle facility. Stormwater discharges to the unnamed tributary to Conococheague Creek.

Photograph 23. **Vehicle Facility Yard:** (DSCN3675.JPG) View, facing west, of the second stormwater basin.

Photograph 24. **Vehicle Facility Yard:** (DSCN3675.JPG) View, facing southeast, of the second stormwater basin. The vehicle facility that owns the stormwater basins is located adjacent to the stormwater basins.

Photograph 25. **Vehicle Facility Yard:** (DSCN3677.JPG) View, facing northwest, of the second stormwater basin.

Photograph 26. **Vehicle Facility Yard:** (DSCN3678.JPG) View, facing northwest, of the third stormwater basin. The third stormwater basin would receive stormwater overflow from the second stormwater basin in the event of extreme rainfall.

Photograph 27. **Vehicle Facility Yard:** (DSCN3680.JPG) View of the overflow spillway from stormwater basin 2 into stormwater basin 3.

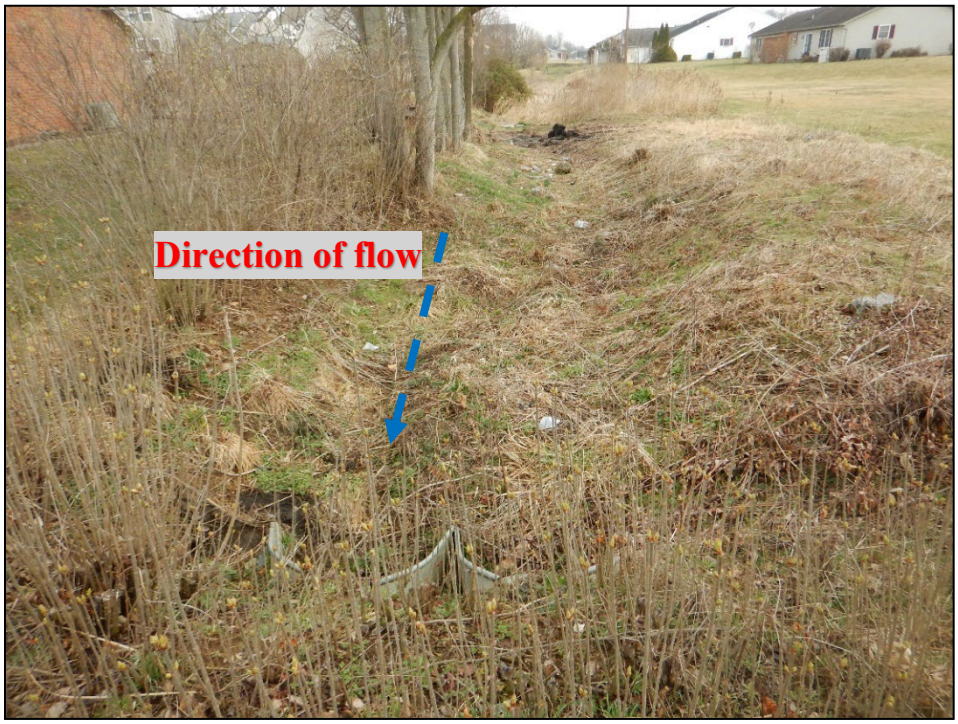
Photograph 28. **Vehicle Facility Yard:** (DSCN3681.JPG) View, facing west, of the overflow spillway from stormwater basin 3. Vegetation was observed growing in the overflow spillway at the time of the inspection.

Photograph 29. **Vehicle Facility Yard:** (DSCN3683.JPG) View, facing north, of the area receiving stormwater discharge to an unnamed tributary to Conococheague Creek from stormwater basin 3. No flow was observed at the time of the inspection. If stormwater overflow were to occur, flow would be discharged to the unnamed tributary to the Conococheague Creek.

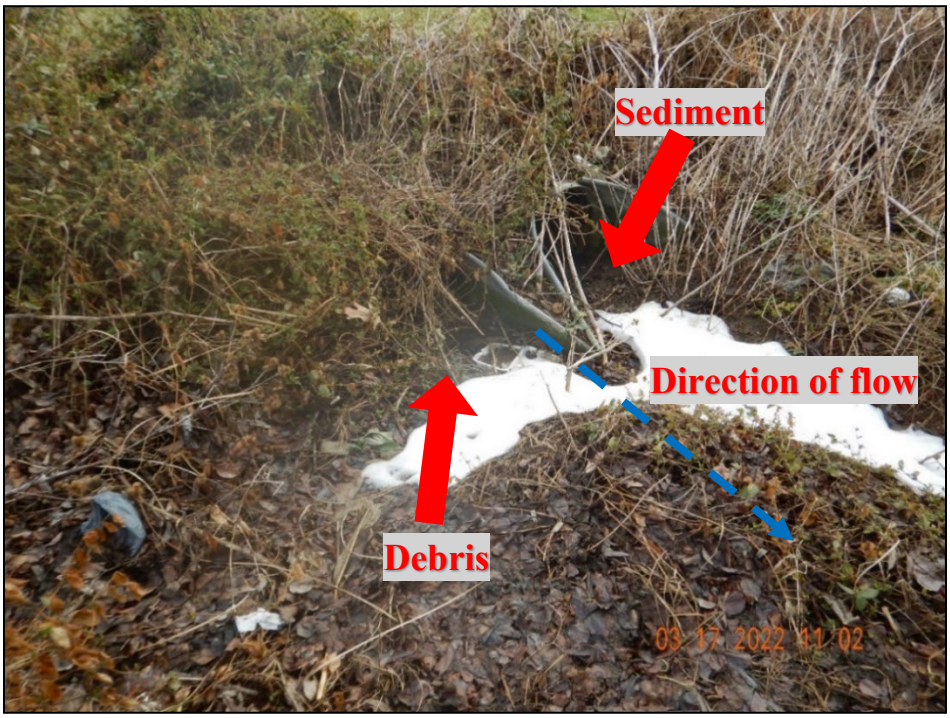
Photograph 30. **Lift Station #3:** (DSCN3691.JPG) View, facing north, of the Lift Station #3 Grindstone Hill Road (Ryan Lane) Pump Station. The station appeared to be in good condition.

Photograph 31. **Lift Station #3:** (DSCN3693.JPG) View, facing east, of the Lift Station #3 Grindstone Hill Road (Ryan Lane) Pump Station, as shown in Photograph 30.

Photograph 32. **Outfalls #0240 & #0245 Jason Drive:** (DSCN3700.JPG) View, facing south, of Outfall #0245. No discharge was observed at the time of the inspection.



Photograph 33. Outfalls #0240 & #0245 Jason Drive: (DSCN2991.JPG) View, facing north, upstream of Outfall #0245 of Paddy Run. Paddy Run was dry at the time of the inspection.



Photograph 34. Outfalls #0240 & #0245 Jason Drive: (DSCN3702.JPG) View, facing northeast, of Outfall #0240. No discharge was observed at the outfall at the time of the inspection. The EPA Inspection Team observed snow, sediment, and debris at the outfall.

Photograph 35. **Outfalls #0240 & #0245 Jason Drive:** (DSCN3704.JPG) View, facing south, downgradient of Outfall #0240 of Paddy Run.

Photograph 36. **Lift Station #21:** (DSCN3704.JPG) View, facing east, of the Lift Station #21 Jason Drive Pump Station.

Photograph 37. **Lift Station #21:** (DSCN3705.JPG) View, facing east, of Lift Station #21 Jason Drive Pump Station, as shown in Photograph 36.

Photograph 38. **Outfall #0250 Nicole Drive:** (DSCN3712.JPG) View of Outfall #0250. The stormwater inlet is owned by PennDOT.

Photograph 39. Outfall #0250 Nicole Drive: (DSCN3714.JPG) View, facing south, of the stormwater basin to which Outfall #0250 discharges (owned and operated by PennDOT).

Photograph 40. Outfall #0250 Nicole Drive: (DSCN3717.JPG) View, facing north, of the inlets to the stormwater basin to which Outfall #0250 discharges. Stormwater from Outfall #0250 does not discharge into a surface water.

Photograph 41. Outfall #0130 East Weaver Road: (DSCN3720.JPG) View, facing north, upstream of Outfall #0130 to the unnamed tributary to Conococheague Creek.

Photograph 42. Outfall #0130 East Weaver Road: (DSCN3723.JPG) View, facing south, downstream of Outfall #0130. The outfall discharges runoff to the unnamed tributary to Conococheague Creek.