



**ANNVILLE TOWNSHIP MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) PROGRAM
INSPECTION REPORT**

Annville Township – 36 North Lancaster Street Annville, PA 17003

Pre-Inspection Call Date: July 31, 2024

Field Inspection Date: August 8, 2024

Report Date: September 17, 2024

ECAD ID Number: ECAD-5513

**U.S. Environmental Protection Agency, Region 3
Enforcement and Compliance Assurance Division
NPDES Section
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September 13, 2024

Date

EPA Region 3 Official:

Mark Zolandz
Section Chief, NPDES Section 1,
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Date

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Table 1. Summary of Permit Requirements and Inspection Observations

(The following observations are based on the information provided by the Township.)

Program Element	Observations
Overall Program Management	No areas of concern noted at this time.
Illicit Discharge Detection and Elimination (IDDE)	Observation 1: The Township's IDDE Program Plan provided by the Township did not appear to include all Permit-required components.
Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment	Observation 2: The Township's inventory of Township-owned/operated post-construction stormwater management best management practices (PCSM BMPs) did not appear to include all Permit-required components. Observation 3: The Township was not ensuring proper operation and maintenance of Township-owned/operated PCSM BMPs.
Pollution Prevention / Good Housekeeping (PPGH)	Observation 4: The Township's written operation and maintenance (O&M) program did not appear to include all Permit-required components.

TABLE OF CONTENTS

	Page
INTRODUCTION	1
INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS.....	2
PRE-INSPECTION CONFERENCE CALL.....	2
FIELD INSPECTION PROCEDURES	2
FIELD INSPECTION OPENING CONFERENCE.....	3
ANNVILLE TOWNSHIP MS4 BACKGROUND.....	4
MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)	4
MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) IN NEW DEVELOPMENT AND REDEVELOPMENT (POST- CONSTRUCTION)	5
MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (PPGH).....	7
POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS (PRP).....	7
FIELD OBSERVATIONS.....	8
MINIMUM CONTROL MEASURE 5: POST-CONSTRUCTION STORMWATER MANAGEMENT (PCSM) IN NEW DEVELOPMENT AND REDEVELOPMENT (FIELD INSPECTIONS).....	8
Millbridge Drive Detention Basin Retrofit	8
Hauck Manufacturing Detention Basin Retrofit.....	9
Liberty Station Detention Basin.....	9
Lebanon Valley College Basins.....	10
MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (FIELD INSPECTIONS)	10
Annville Township Public Works Department Facility	10
Annville Township Recycling Center	11
Appendix A: <i>National Pollutant Discharge Elimination System (NPDES) Individual Permit To Discharge Stormwater From Small Municipal Separate Storm Sewer Systems (MS4s) (NPDES Permit No. PAG133591, effective March 16, 2018)</i>	
Appendix B: Photo Log	
Appendix C: Exhibit Log	

INTRODUCTION

On July 31, 2024, and August 8, 2024, one EPA Region 3 representative and two EPA contractors from Eastern Research Group, Inc. (ERG) (hereinafter, EPA Inspection Team) performed a compliance inspection of Annville Township's (hereinafter, Annville, or the Township) Municipal Separate Storm Sewer System (MS4). The inspection was conducted to assess the Township's compliance with the requirements of the Commonwealth of Pennsylvania's *National Pollutant Discharge Elimination System (NPDES) General Permit to Discharge Stormwater from Small Municipal Separate Storm Sewer Systems (MS4s)* (NPDES Permit No. PAG133591; hereinafter, the "Permit"). A copy of the Permit is provided in Appendix A.

The purpose of this inspection was to obtain information to assist EPA Region 3 in assessing Annville Township's compliance with the requirements of the Permit, as well as the implementation status of its MS4 program. The presentation of observations in this report does not constitute a formal compliance determination or notice of violation.

The inspection focused on overall program management and the following Permit components:

- Illicit Discharge Detection and Elimination (IDDE);
- Post-Construction Stormwater Management (PCSM) in New Development and Redevelopment;
- Pollution Prevention / Good Housekeeping (PPGH); and
- Pollutant Control Measures and Pollutant Reduction Plans

The EPA Inspection Team obtained information through a records review and interviews with Township staff. Interviews were conducted during the pre-inspection conference call ("pre-inspection call") and during the field inspection. The following primary representatives participated in the inspection:

Township Representatives	Les Powell (Director of Public Works); (717) 867-4476, les@annvilletwp.com Joe Viozzi (Assistant Director of Public Works); (717) 867-4476, jviozzi@annvilletwp.com Darren Heisey – Township MS4 Coordinator with Steckbeck Engineering & Surveying, Inc. ; (717) 272-7110 ext. 103, dheisey@steckbeck.net
EPA Representative	Johannah Jacobson – EPA Region 3; (215) 814-2318, jacobson.johannah@epa.gov
State Representatives:	Leah Staley – Senior Civil Engineer Hydraulic, Pennsylvania Department of Environmental Protection (PADEP) South Central Regional Office; (717) 705-4814, lestaley@pa.gov

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EPA Contractors

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INFORMATION OBTAINED RELATIVE TO PERMIT REQUIREMENTS

The EPA Inspection Team obtained documentation and other supporting information to evaluate compliance with the Permit prior to, during, and after the remote interview and field inspection. Observations regarding the Township’s implementation of Permit requirements are presented in this report.

On July 18, 2024, the EPA Inspection Team provided the Township with an inspection notification and a records request that listed documents for review for the inspection, with specific items to be provided prior to the inspection. The Township provided the requested documents electronically to the EPA Inspection Team utilizing a shared folder on July 26, 2024, with additional documents provided on August 7, 2024. The EPA Inspection Team reviewed the documentation and other supporting evidence provided by the Township regarding compliance with the Permit. Referenced documentation used as supporting information is provided in Appendix C, Exhibit Log.

The following sections of this report describe the Township’s approach to implementing minimum control measures, relevant Permit requirements, and observations made during the inspection process.

PRE-INSPECTION CONFERENCE CALL

On July 31, 2024, the EPA Inspection Team conducted a pre-inspection call with representatives from Annville Township’s MS4 program. The pre-inspection call focused on overall MS4 program management, three MS4 minimum control measures (MCMs) (IDDE, PCSM, PPGH), and the Township’s PRP.

FIELD INSPECTION PROCEDURES

On August 8, 2024, the EPA Inspection Team conducted six (6) field inspections related to MS4 program requirement and oversight: four (4) post-construction stormwater best management practices (PCSW BMPs), the Department of Public Work’s Headquarters (DPW HQ), and the Township’s Recycling Center.

Inspection observations based on information gained during the Pre-Inspection Conference Call and the field inspections are documented in the sections below. At the end of the inspections

on August 7, 2024, the EPA Inspection Team presented their preliminary observations to the Township representatives.

The EPA Inspection Team informed the operator that any information that the site deemed to be confidential business information (CBI) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA's CBI procedures.

Photographs were taken during the inspection by the EPA contractor, Taylor Fontaine, and are provided in Appendix B, Photograph Log. Some photos may be omitted from the log to avoid redundancy but can be made available upon request.

FIELD INSPECTION OPENING CONFERENCE

The EPA Inspection Team arrived at DPW HQ in Annville, PA at 8:30 AM (EDT) on August 8, 2024. DPW-HQ was the central meeting place for the field inspections. Taylor Fontaine (ERG) displayed his EPA-issued Clean Water Act inspector credential to the Township representatives at the outset of the field inspection and explained that the purpose of the field inspection was to make observations to complement the pre-inspection call portion of the Annville MS4 program inspection conducted July 31, 2024.

The weather during the field inspection on August 8, 2024 was cloudy with intermittent rainfall and temperatures averaging approximately 75 degrees Fahrenheit. Table 2 presents National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and the six (6) days prior.

Table 2. Total Precipitation Preceding and During Inspection

Station Name	Date	Precipitation Amount (inches) ¹
HERSHEY 2.1 NW, PA US US1PADP0033	August 2, 2024	0.01
HERSHEY 2.1 NW, PA US US1PADP0033	August 3, 2024	0.04
HERSHEY 2.1 NW, PA US US1PADP0033	August 4, 2024	0.62
HERSHEY 2.1 NW, PA US US1PADP0033	August 5, 2024	0.00
HERSHEY 2.1 NW, PA US US1PADP0033	August 6, 2024	0.00
HERSHEY 2.1 NW, PA US US1PADP0033	August 7, 2024	1.04
HERSHEY 2.1 NW, PA US US1PADP0033	August 8, 2024	0.05

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

ANNVILLE TOWNSHIP MS4 BACKGROUND

The Township's MS4 covers approximately 1.62 square miles and serves 4,830 people per the 2020 census. The primary receiving water is Quittapahilla Creek. The segments of this waterbody located within the Township are not listed as impaired on Pennsylvania's 303(d) list.

The Township's MS4 program is administered and implemented by the Township's Department of Public Works (DPW) and the Township Manager's office. Township staff explained that the MS4 program is funded through the Township's stormwater fee. For residents and businesses, the stormwater fee is based on the amount of impervious area.

- The DPW inspects outfalls and investigates illicit discharges.
- The Township relies on the contractor Steckbeck Engineering & Surveying, Inc. (hereinafter, Steckbeck) for engineering services, assistance with MS4 program plan review, MS4 program document submittal, and erosion and sediment site plan reviews.
- Additionally, the Township is part of the Lebanon County Stormwater Consortium, an intergovernmental agreement with five (5) other municipalities that assists with the development and implementation of the Township's Chesapeake Bay Pollutant Reduction Plan (PRP).
- The Township Manager's office and the CCD assist the DPW with MS4 Permit compliance and facilitation.

The Township is authorized to discharge stormwater through its MS4 under the current NPDES Permit effective March 16, 2018, until its expiration on March 15, 2023. The current permit has been administratively extended.

MINIMUM CONTROL MEASURE 3: ILLICIT DISCHARGE DETECTION AND ELIMINATION (IDDE)

The Township's DPW administers the Township's IDDE program. According to the Township's 2022-2023 annual report, the Township has forty-three (43) MS4 outfalls within its regulated boundary. Township staff stated all Township outfalls were mapped. Steckbeck updated the Township's MS4 mapping in 2023 and 2024 (refer to [Appendix C, Exhibit 1](#)). The map includes all the required components specified in the Permit.

Annville Township's stormwater ordinance (dated July 19, 2024) prohibits illicit discharges into the Township's MS4 (refer to [Appendix C, Exhibit 2](#)). The Township's IDDE Program includes standard operating procedures (SOPs) to track, identify, and address unauthorized non-stormwater discharges (refer to [Appendix C, Exhibit 3](#)). Township representatives stated that the Township's DPW or Township Manager's office often receives reports of illicit discharges or emergency situations that involve spills or other types of illicit discharges. The Township's DPW will then investigate the source of the reported discharge and initiate response actions if necessary.

Permit Part C.I.B.3.a states, “The permittee 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...”

Observation 1: The Annville Township IDDE Narrative provided by the Township appeared to be missing some of the Permit-required components (refer to Appendix C, Exhibit 3). Specifically, the written narrative did not include:

- Procedures for addressing information or complaints received from the public. During the pre-inspection call on July 31, 2024, Township representatives explained that the Township Manager usually receives calls on potential illicit discharge and tasks the DPW with the investigation and follow up. The Township did not have written procedures directing IDDE complaint response.

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

The Township’s DPW administers the post-construction program. In response to the initial records request, the Township provided the EPA Inspection Team with an inventory of all known Township-owned/operated and privately-owned/operated PCSM BMPs (hereinafter, BMPs). The list identified eighteen (18) BMPs including ownership and BMP type (refer to Appendix C, Exhibit 4).

The Township’s DPW is responsible for inspecting and maintaining the Township-owned/operated BMPs. However, Township representatives stated that maintenance of the Township-owned/operated BMPs is not tracked.

The Township uses the *Annville Township Stormwater Management Ordinance* (revised 9/6/2022) as their legal mechanism for PCSM (refer to Appendix C, Exhibit 5). According to Township representatives, maintenance of privately-owned BMPs is the responsibility of the property owner, and the maintenance requirements are included in the operation and

maintenance (O&M) plans associated with the property's deed. According to Township representatives, if issues are identified at privately-owned BMPs, the Township's DPW communicates to the owner that maintenance is needed, and the owner is responsible for addressing the issue. Issues are typically identified by concerned citizens. If the owner does not comply, Township representatives stated that the Township's ordinance provides the Township the right to access the property and back bill the owner for maintenance and repair costs. The Township provided a recent example of a letter sent by the Township to a private owner who was not conducting the required maintenance on their BMP (refer to [Appendix C, Exhibit 6](#)).

Permit Part C.I.B.5.c states, "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.

An inventory of PCSM BMPs shall be developed by new permittees by the end of the first year of Permit coverage and shall be continually updated during the term of coverage under the Permit as development projects are reviewed, approved, and constructed. Existing permittees shall update and maintain their current inventory during the term of coverage under the Permit. The permittee must track the following information in its PCSM BMP inventory:

- All PCSM BMPs that were installed to meet requirements in NPDES Permits for Stormwater Discharges Associated with Construction Activities approved since March 10, 2003.
- The exact location of the PCSM BMP (e.g., latitude and longitude, with street address).
- Information (e.g., name, address, phone number(s)) for BMP owners and entities responsible for BMP O&M, if different from BMP owners.
- The type of BMP and the year it was installed.
- Maintenance required for the BMP type according to the Pennsylvania Stormwater BMP Manual or other manuals and resources.
- The actual inspection/maintenance activities conducted for each BMP.
- 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's inventory of Township and privately-owned/operated BMPs appeared to be missing some of the Permit-required components (refer to [Appendix C, Exhibit 4](#)). The following information was not provided for the listed BMPs in the inventory:

- 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 the BMP; and
- An assessment by the permittee if proper O&M has occurred during the year and if not, what actions the permittee has taken, or shall take, to address compliance with O&M requirements.

Observation 3: During the pre-inspection call on July 31, 2024, Township representatives stated that the Township does not have written procedures to ensure long-term maintenance of Township-owned/operated BMPs. Further, Township representatives stated that maintenance of Township-owned/operated BMPs is not recorded.

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (PPGH)

The Township's DPW administers the Township's PPGH program. According to Township representatives, the DPW is responsible for maintenance of Township-owned facilities. The Township identified nineteen (19) Township-owned or managed facilities within the MS4 area that have the potential for generating pollution in stormwater runoff (refer to Appendix C, Exhibit 7). The facilities include the DPW facility, recycling areas, and wastewater treatment plant (WWTP). The Township developed an O&M Plan for the Township's PPGH program (refer to Appendix C, Exhibit 8).

Permit Part C.I.B.6.b 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..."

Observation 4: The Township's written O&M program did not include the following Permit-required components (refer to Appendix C, Exhibit 8):

- Maintenance schedules and inspection procedures to reduce the potential for pollutants to reach the regulated small MS4s.

POLLUTANT CONTROL MEASURES AND POLLUTANT REDUCTION PLANS (PRP)

Steckbeck developed the Township's Joint Chesapeake Bay Pollutant Reduction Plan (PRP), submitted to PADEP for approval on October 11, 2017, for total nitrogen (TN), total phosphorus (TP), and total suspended solids (TSS) (refer to Appendix C, Exhibit 9). The PRP was approved by the PADEP on December 12, 2019.

As stated in the Background section above, the Township is part of the Lebanon County Stormwater Consortium, an intergovernmental agreement with five (5) other municipalities that assists with the development and implementation of the Township's Chesapeake Bay PRP.

These municipalities are Annville Township, the City of Lebanon, Cleona Borough Authority, North Cornwall Township, North Lebanon Township, and South Lebanon Township.

According to the Township's PRP Addendum #1, dated September 30, 2020, the Lebanon County Stormwater Consortium ("Consortium") identified 81 potential BMP projects to assist in meeting the reduction goals (refer to [Appendix C, Exhibit 10](#)). Township representatives stated that, while there are no PRP projects within the Township's jurisdiction, the Township provides funding for the projects. As part of the inspection, the EPA Inspection Team visited two PRP projects outside of the Township's jurisdiction in which funding was provided by the Township: Millbridge Drive Detention Basin Retrofit and Hauck Manufacturing Detention Basin Retrofit. The Township provided the EPA Inspection Team with the projected load reduction calculations for those projects (refer to [Appendix C, Exhibit 11](#)). Based on these projects and others, Township representatives stated that the Township met their required pollutant load reductions.

FIELD OBSERVATIONS

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

Millbridge Drive Detention Basin Retrofit

Address/Location: 40.327632°, -76.480210°, (Off Millbridge Drive, Lebanon)

Relevant Minimum Control Measure (MCM): Post Construction/ Pollutant Control Measures and Pollutant Reduction Plans

Entry Time: 10:05 AM (EDT) August 8, 2024

Exit Time: 10:15 AM (EDT)

Description: The Millbridge Drive Detention Basin Retrofit is located off Millbridge Drive in the North Cornwall Township and is maintained by North Cornwall Township. The EPA Inspection Team chose this BMP since Annville Township, as part of the Lebanon County Stormwater Consortium, receives pollutant reduction credit from this BMP. The basin receives stormwater from the adjacent Millbridge Drive. Township representatives stated that, as part of the retrofit, a stone trench and underdrain were installed to filter sediment before stormwater discharges from the basin.

Observations: The EPA Inspection Team made the following observations at Millbridge Drive Detention Basin Retrofit.

- 1) The EPA Inspection Team viewed the entire basin and observed: the stone trench atop the underdrain, the concrete riser and outlet, and the inlet to the basin (refer to [Appendix B, Photographs 1 through 3](#)).
- 2) Based on observations and comparison to the basin plans, the EPA Inspection Team observed that the basin was located, constructed, and maintained as designed (refer to [Appendix C, Exhibit 12](#)).

Hauck Manufacturing Detention Basin Retrofit

Address/Location: 40.337392°, -76.480772°, (Off Harris Street, Cleona)

Relevant Minimum Control Measure (MCM): Post Construction/ Pollutant Control Measures and Pollutant Reduction Plans

Entry Time: 10:30 AM (EDT) August 8, 2024

Exit Time: 10:40 AM (EDT)

Description: The Hauck Manufacturing Detention Basin Retrofit is located off Harris Street in Cleona Borough and receives stormwater adjacent business parking lots. The basin is maintained by Cleona Borough. The EPA Inspection Team chose this BMP since Annville Township, as part of the Lebanon County Stormwater Consortium, receives pollutant reduction credit from this BMP. Township representatives stated that as part of the retrofit, the basin was extended, and the outlet was modified to promote sedimentation.

Observations: The EPA Inspection Team made the following observations at the Hauck Manufacturing Detention Basin Retrofit.

- 1) The EPA Inspection Team observed the entire basin including the concrete riser and outlet, and the inlets to the basin (refer to [Appendix B, Photographs 4 and 5](#)).
- 2) Based on observations and comparison to the basin plans, the EPA Inspection Team observed that the basin was constructed as designed (refer to [Appendix C, Exhibit 13](#)).
- 3) The EPA Inspection Team observed a buildup of sediment and vegetation downgradient from one of the basin inlets (refer to [Appendix B, Photograph 5](#)).

Liberty Station Detention Basin

Address/Location: 40.332840°, -76.507190° (Off Liberty Street, Annville)

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 10:45 AM (EDT) August 8, 2024

Exit Time: 10:57 AM (EDT)

Description: The Liberty Station Detention Basin is a privately owned BMP located in Annville that receives stormwater from the adjacent Liberty Street, Union Crest Drive, and Saylor Street. Excess stormwater is conveyed through an outlet pipe and into the Township's MS4 system. Prior to the inspection, the Township sent a notice to the owner of the property reminding them of their maintenance responsibilities (refer to [Appendix C, Exhibit 6](#)). The Township notice stated:

- "The fence is in disrepair and needs to be fixed.
- All vegetation not required by the Subdivision Plan needs to be removed.
- All vegetation within the rip-rap aprons needs to be removed.
- The basin embankment needs to be routinely mowed."

Observations: The EPA Inspection Team made the following observations at the Liberty Station Detention Basin.

- 1) The BMP appeared to be located and constructed as designed (refer to Appendix B, Photographs 6 through 10).
- 2) The EPA Inspection Team observed:
 - a. The basin embankment had recently been mowed,
 - b. The fence was in good condition,
 - c. There was vegetation on the riprap aprons.
 - d. There was vegetation inside the basin not included in the as-built plans (refer to Appendix B, Photographs 6 through 10), (refer to Appendix C, Exhibit 14).

Lebanon Valley College Basins

Address/Location: 40.336230°, -76.514380° (Off Heisey Road, Annville)

Relevant Minimum Control Measure (MCM): Post Construction

Entry Time: 11:05 AM (EDT) August 8, 2024

Exit Time: 11:20 AM (EDT)

Description: The Lebanon Valley College Basins are privately owned BMPs that receive stormwater runoff from Arnold Health Professions Pavilion roof drains and parking lot. Township representatives stated that excess stormwater is conveyed to a perennial stream and then into the Township's MS4 system.

Observations: The EPA Inspection Team made the following observations at the three (3) Lebanon Valley College Basins.

- 1) The EPA Inspection Team observed the detention basin BMPs.
- 2) The Township representatives did not know the last time maintenance was conducted, but the embankments of the BMPs were recently mowed (refer to Appendix B, Photographs 11 through 15).
- 3) The EPA Inspection Team observed the outlet structures for the basins, which appeared to be in good condition (refer to Appendix B, Photographs 12 and 13).

MINIMUM CONTROL MEASURE 6: POLLUTION PREVENTION / GOOD HOUSEKEEPING (FIELD INSPECTIONS)

Annville Township Public Works Department Facility

Address/Location: 675 West Main Street Annville, PA 17003

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 8:30 AM (EDT) August 8, 2024

Exit Time: 9:37 AM (EDT)

Description: Annville Township DPW HQ is used to store and maintain vehicles and materials. The DPW HQ also houses the Township's salt storage structure, a vehicle washing garage, a vehicle maintenance shop, the equipment storage area, a small portion of their aggregate material (gravel) storage and offices for DPW personnel. Township representatives stated that fueling for municipal vehicles is done in Cleona Borough.

Observations: The EPA Inspection Team made the following observations at the Township DPW HQ.

- 1) The EPA Inspection Team observed floor drains inside the DPW HQ primary garage (refer to [Appendix B, Photograph 16](#)). Township representatives stated Township vehicles are washed in this bay and the floor drains are connected by a pipe which conveys wash water to the adjacent WWTP headworks. The EPA Inspection Team observed the floor drain discharge pipe (refer to [Appendix B Photograph 20](#)).
- 2) The EPA Inspection Team observed the Township's two-bay storage structure for cold patch and road salt (refer to [Appendix B, Photographs 17 through 19](#)). The structure was covered but only enclosed on the sides. However, there was concrete blocking on the backside of the structure. The EPA Inspection Team did not observe salt or cold patch migration from the structure.
- 3) The EPA Inspection Team observed the DPW HQ's gasoline, diesel fuel and used oil storage area (refer to [Appendix B, Photograph 21](#)). The two (2) aboveground fuel tanks had secondary containment. The tote, used to store used oil, did not have secondary containment. No evidence of spillage or staining was observed on the pavement or concrete in the storage area.
- 4) The EPA Inspection Team observed the area at the DPW HQ where the Township stores catch basin materials to dry (refer to [Appendix B, Photographs 22 and 23](#)). The wet catch basin materials are contained via concrete blocks and the liquid is drained into the wastewater treatment plant for processing. According to Township representatives, once the materials are dried, they are then taken to a landfill outside of the Township.

Annville Township Recycling Center

Address/Location: 675 West Main Street Annville, PA 17003

Relevant Minimum Control Measure (MCM): PPGH

Entry Time: 9:40 AM (EDT) August 8, 2024

Exit Time: 9:52 AM (EDT)

Description: Annville Township Scranton Recycling Center is a public drop off location for bulk waste items and yard waste for Township residents.

Observations: The EPA Inspection Team made the following observations at the Recycling Center.

- 1) The EPA Inspection Team observed four (4) uncovered dumpsters used for Township residents to drop off bulk trash items and yard waste (refer to [Appendix B, Photographs 24 through 26](#)). Township representatives stated the dumpsters do not have permanent lids/covers.
- 2) The EPA Inspection Team observed one of the yard waste dumpsters contained a gap between the dumpster side and the bottom where liquids would leak onto the adjacent concrete surface (refer to [Appendix B, Photographs 25 and 26](#)).

CLOSING CONFERENCE

After the field inspections, the EPA Inspection Team met with the Township representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the Township representatives. 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 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 EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:45 AM.