NOTICE OF VIOLATION

CERTIFIED MAIL NO. 9171 9690 0935 0230 7536 67

Ms. Susan Armstrong  
Borough of Carlisle  
53 West South Street  
Carlisle, PA 17013

Re: Sewage -3A  
Carlisle STP  
NPDES Permit No. PA0026077  
Middlesex Township, Cumberland County

Dear Ms. Armstrong:

The Pennsylvania Department of Environmental Protection (Department) responded to a reported fish kill on the Letort Spring Run, within the U.S. Army Barracks – Carlisle, on July 31, 2019. The Department conducted an inspection and collected surface water samples for field testing. In conjunction with Department personnel, staff from the Carlisle STP, collected surface water samples for laboratory analysis. These samples were analyzed by the Department’s Bureau of Laboratories.

Evidence of the fish kill was observed from the 600 Block of Letort Lane in a channelized portion of the Letort Spring Run to Post Road. A contractor for the Borough of Carlisle was working at a site in close proximity (50 feet upstream of the observed fish kill) to the Letort Spring Run channel. The contractor was performing cure in place pipe (CIPP) installation in the Letort Interceptor, as part of the Borough of Carlisle’s ongoing rehabilitation project. The CIPP process employed by the contractors uses heated water in contact with a Styrene based resin. Sample results for Styrene are summarized in the table below.

<table>
<thead>
<tr>
<th>Sample Number</th>
<th>Location Description</th>
<th>Coordinates</th>
<th>Sample Collector</th>
<th>Analyzed By</th>
<th>Styrene Analysis Result</th>
<th>Time of Sample Collection</th>
</tr>
</thead>
<tbody>
<tr>
<td>1798-102</td>
<td>Post Road South Branch Letort Spring Run</td>
<td>40.2138072, -77.1686618</td>
<td>Carlisle Borough Lab Personnel</td>
<td>DEP Bureau of Labs</td>
<td>28.6 ug/L</td>
<td>1300hrs</td>
</tr>
<tr>
<td>1798-103</td>
<td>Letort Lane 50 ft upstream of Barry Drive.</td>
<td>40.2116268, -77.1760660</td>
<td>Carlisle Borough Lab Personnel</td>
<td>DEP Bureau of Labs</td>
<td>7.9 ug/L</td>
<td>1429hrs</td>
</tr>
<tr>
<td>1798-104</td>
<td>Post Road North Branch Letort Spring Run</td>
<td>40.21405, -77.16867</td>
<td>Carlisle Borough Lab Personnel</td>
<td>DEP Bureau of Labs</td>
<td>No styrene detected</td>
<td>1320hrs</td>
</tr>
<tr>
<td>1798-105</td>
<td>Biddle Mission Park</td>
<td>40.204194, -77.182407</td>
<td>Carlisle Borough Lab Personnel</td>
<td>DEP Bureau of Labs</td>
<td>No styrene detected</td>
<td>1344hrs</td>
</tr>
<tr>
<td>1798-106</td>
<td>At injection site immediately downstream</td>
<td>40.208953, -77.180771</td>
<td>Carlisle Borough Lab Personnel</td>
<td>DEP Bureau of Labs</td>
<td>0.71 ug/L</td>
<td>1408hrs</td>
</tr>
</tbody>
</table>
A release of "pollution," chemical or thermal, as defined in The Clean Streams Law, to the Waters of the Commonwealth is in violation of Section 401 of The Clean Stream Law and subjects you to appropriate enforcement action.

In addition, an unpermitted discharge of raw sewage was observed from a portable pump hose flowing onto the ground and into the channelized portion of the Letort Spring Run. The pump station was used by the same contractors in conjunction with the Letort Interceptor Rehabilitation Project. Discharge of untreated sewage to the Waters of the Commonwealth is a violation of Sections 201 and 202 of the Clean Streams Law and subjects you to appropriate enforcement action.

The Department requests that the Borough of Carlisle submit a written report of its own investigation into this incident including the circumstances leading to the incident and the Borough's role in oversight of the project, to this office within 15 days of the date of this letter. Please also include a proposed timeline for completing the Letort Interceptor Rehabilitation project and thermocouple data analysis as a potential cause of the fish kill.

This Notice of Violation is neither an order nor any other final action of DEP. It neither imposes nor waives any enforcement action available to DEP under any of its statutes. If DEP determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions concerning this notice, please contact me at 717.503.6264 or mbenham@pa.gov.

Sincerely,

Michael Benham
Water Quality Specialist
Clean Water Program

Enclosures: Inspection Report
Laboratory results
Styrene Safety Data Sheet

cc: Officer Rachael Thurner-Diaz (via email)
    Captain Anthony Quarracino, Jr. (via email)