



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): August 28-29, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: Quakertown Wastewater Treatment Plant
Permittee: Quakertown Borough
Facility Address: 777 East Broad St. Quakertown, PA 18591
Facility Latitude: 40.442508
Facility Longitude: -75.318502
County/Parish: Bucks County
Permit No: PA0043974
NAICS Code: 221320
SIC: 4952
Unique Project #: ECAD- 483

Facility Representative:

Justin Reiss, Pretreatment Coordinator

Email: Jreiss@quakertown.org

David Erwin, Supervisor

Email: Derwin@quakertown.org

Point of Contact



Inspectors:

Angela Weisel, EPA

Email: Weisel.angela@epa.gov

Erin Desandro, EPA

Email: Desandro.erin@epa.gov

(List of additional attendees in Table 1)

Report Preparer

Signature/Date

Angela Weisel, NPDES 1 Section

Date

Supervisor

Signature/Date

Mark Zolandz, NPDES 1 Section Chief

Date

Attachments

- Attachment A Industrial User Site Visit Data Sheets
- Attachment B Industrial User Site Visit Photograph Log
- Attachment C Waste Manifest for Lepko
- Attachment D NPDES Permit No. PA0020290
- Attachment E Sewer Use Ordinance

I. Inspection Summary

Upon arrival at the Quakertown wastewater treatment plant (“WWTP”) (hereinafter, the “Facility”), United States Environmental Protection Agency (“EPA”) Region 3 representatives Angela Weisel, Erin DeSandro, Amrita Gupta, and EPA contractor Chuck Durham, (jointly referred to as the “Inspection Team”), met with the Facility contacts Justin Reiss and David Erwin (“Facility representatives”). See Table 1 below for a full list of attendees. The EPA Inspection Team presented their credentials, discussed the purpose and format of the pretreatment compliance inspection (“PCI” or “Inspection”) and interviewed the Facility representatives about the Facility’s pretreatment program.

Table 1: Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Angela Weisel	Environmental Protection Agency	215-814-2124	weisel.angela@epa.gov
Erin DeSandro	Environmental Protection Agency	215-814-2125	Desandro.erin@epa.gov
Amrita Gupta	Environmental Protection Agency	215- 814 - 3298	Gupta.amrita@epa.gov
Chuck Durham	EPA Contractor, PG Environmental	615-888-2928	Chuck.Durham@pgenv.com
Site/Facility Representatives			
Justin Reiss	Pretreatment Coordinator, Quakertown WWTP	215-536-5004	jreiss@quakertown.org
David Erwin	Supervisor, Quakertown WWTP	-	derwin@quakertown.org
State or County Representatives			
N/A	No state representatives in attendance		

As part of the PCI, the Inspection Team reviewed the following nondomestic discharger files:

- Lepko Finishing, Inc. (“Lepko”) (categorical industrial user [“CIU”] subject to *Title 40 of the Code of Federal Regulations* [40 CFR] Part 433, Metal Finishing Point Source)
- RR Donnelley (Significant Industrial User [“SIU”])

As part of the inspection, the Inspection Team also conducted site visits at Lepko Finishing and RR Donnelley. Photographs from the Inspection were taken by Erin DeSandro and are attached as Attachment B.

II. Program Description	
The Quakertown Wastewater Treatment Plant is a treatment plant with a design capacity of 4 million gallons per day (MGD). It serves approximately 10,000 residents, with a reported average discharge of 3 MGD. There are approximately 4,798 connections to the system: 3,543 residential, 16 borough, 1,045 commercial, 192 industrial and 2 sport facilities. The Facility provides service to Quakertown Borough, along with the municipalities of Richland Town Borough and Richland Township. The POTW does have agreements in place with each contributing jurisdiction addressing pretreatment program responsibilities. The NPDES Permit No. PA0020290 was effective on October 1, 2020 and expires September 30, 2025 (Attachment D)	

III. Industrial User (IU) Characterization		
IUs currently identified by the Control Authority (CA)	IU Type	
2	Discharging Significant Industrial Users	
	1	Discharging Non-Categorical SIUs (as defined by the CA)
	1	Categorical Industrial Users (CIUs)
	0	Middle Tier CIUs
0	Zero-Discharging CIUs	
0	Non-significant CIU (NSCIU)	
0	Other Regulated IUs (e.g., permitted IUs) Describe: Not applicable (N/A)	
16	Waste Haulers Describe: There are approximately 16 waste haulers who dispose of about 900,000 gallons a month to the WWTP. Each hauler fills out a Liquid Waste Disposal form that permits them to dump holding from holding tanks and septic.	

IV. Findings Summary Table	
Finding C.4.a – The permits reviewed did not include applicable effluent limits.	
Finding C.4.a.1 – The Lepko facility has not been monitoring for total toxic organics (TTO).	
Finding C.4.a.2 – The Lepko permit does not state whether the facility should be classified as an existing or new source.	
Finding C.4.b – Local limits were adopted but not incorporated into IU permits.	
Finding C.4.c – The permits reviewed did not specify sampling frequency or location.	
Finding C.4.d – The permits reviewed did not specify that the records retention period may be extended at the request of the State or EPA.	
Finding C.4.e – The permits reviewed do not contain the requirement for notification of changes affecting the potential for a slug discharge.	

IV. Findings Summary Table
Finding C.4.f – The permits reviewed were missing the requirement to develop and maintain a slug discharge control plan.
Finding E.2 – The Facility is not collecting flow-proportional composite samples at SIUs.
Finding E.3 – The facility is not collecting grab samples for pH.
Finding E.4 – The facility is not analyzing pH within the required holding time.

V. Evaluation

The Inspection Team discussed the topics in Subsections A-G below regarding the pretreatment program with the Facility representatives. The Inspection Team also reviewed SIU files to assess the retention of required program documents and to generally evaluate overall program implementation. The following sections describe program areas of concern identified during the inspection process along with compliance assistance items, and associated references to 40 CFR Part 403. All compliance assistance items are included strictly for informational purposes and should not be construed as a formal order or instruction from EPA.

A. Control Authority (CA) Pretreatment Program Modification

1. When was the last program modification? Did the CA notify the EPA of program modifications? (40 CFR 403.18)

According to the Facility representatives, the Facility last updated its local sewer use ordinance on February 12, 2024 (Attachment E). The updated sewer use ordinance adopted revised local limits for Zinc and Cyanide. This was an amendment to the previous local limits that were last updated on April 18, 2023.

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

The Facility provides service to Quakertown Borough, along with the municipalities of Richland Town Borough and Richland Township. The Facility does have agreements in place with each contributing jurisdiction addressing pretreatment program responsibilities.

B. IU Characterization

1. Describe the CA's procedure for identifying and locating IUs that might be subject to the pretreatment program. Has the CA identified and located all applicable IUs (non-categorical SIUs, CIUs, NSCIUs, etc.)? (40 CFR 403.8(f)(2)(i))

According to the Facility representatives, the POTW conducts informal surveys by staying up- to date with local businesses. A code enforcement officer from the borough also notifies the WWTP when new businesses are erected within the service area. New industrial users are required to complete a survey/application. Permits require notification of any changes in wastewater composition or volume to the Facility.

2. Has the CA identified the character and volume of pollutants contributed to the publicly owned treatment works (POTW) by IUs subject to the pretreatment program? (40 CFR 403.8(f)(2)(ii))

Yes, the Facility conducts inspections and sampling at each IU at least once per year.

3. Has the CA prepared and maintained a list of SIUs, as defined in 403.3(v)(1), along with the applicable SIU criteria? Does the list indicate whether the CA has made a determination that an SIU is a NSCIU, as defined in 403.3(v)(2), rather than an SIU? Have modifications to the list been submitted with annual reports? (40 CFR 403.8(f)(6))

Yes, the Facility maintains a current list of IUs, which it submits in the annual reports to EPA Region 3.

C. Control Mechanism Evaluation

1. Has the CA issued individual or general control mechanisms to all SIUs? (40 CFR 403.8(f)(1)(iii))

All SIUs whose files were reviewed during the inspection had been issued an individual permit. SIU permits are issued for a maximum of five years. The Facility was not implementing any general permit options at the time of the inspection.

2. Do the applications for general control mechanism contain all of the following? (40 CFR 403.8(f)(1)(iii)(A)(2))

- a. Contact info
- b. Production processes
- c. Types of wastes generated
- d. Location for monitoring
- e. Any request for waiver for pollutants not present per 40 CFR 403.12(e)(2)

Not applicable (N/A). The Facility had not issued general control mechanisms at the time of the inspection.

3. Are general control mechanisms only issued for IUs where all of the following is true? (40 CFR 403.8(f)(1)(iii)(A)(1))

- a. Involve same/substantially similar types of operations
- b. Discharge the same type of waste
- c. Same effluent limitations
- d. Same or similar monitoring
- e. There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations

N/A. The Facility had not issued general control mechanisms at the time of the inspection.

**4. Do both individual and general control mechanisms include the following, where applicable?
(40 CFR 403.8(f)(1)(iii)(B))**

- a. Statement of duration (5 years max)
- b. Statement of non-transferability
- c. Applicable effluent limits (local limits, categorical standards, BMPs)
- d. Self-monitoring requirements
 - Identification of pollutants to be monitored
 - Sampling frequency
 - Sampling locations/discharge points
 - Appropriate sample types
 - Reporting requirements
 - Record-keeping requirements
- e. Statement of applicable civil and criminal penalties
- f. Compliance schedules
- g. Notice of slug loading or potential problems at POTW
- h. Notification of spills, bypasses, upsets, etc.
- i. Notification of significant change in discharge
- j. 24-hour notification of effluent violation
- k. Submit resampling results within 30-days
- l. Slug discharge control plan requirement, if required by POTW
- m. Certification statements
- n. Sampling/analysis requirements (Part 136 or alternative)
- o. Reporting of additional sampling
- p. 90-day compliance report

The individual IU permits reviewed as a component of the inspection did not include all of the aforementioned provisions. Findings regarding the content of individual control mechanisms are provided below. The Facility had not issued general control mechanisms at the time of the inspection.

Finding C.4.a – The permits reviewed did not include applicable effluent limits.

Regulatory Requirement

The federal regulations at 40 CFR 433.10 states that the following six metal finishing operations on any basis material are applicable to metal finishing standards: “Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. If any of those six operations are present, then this part applies to discharges from those operations...”

Lepko Finishing Inc. is categorized as a Metal Finisher and is subject to effluent limits established by

pretreatment regulations for metal finishers.

Finding C.4.a.1. – The Lepko facility has not been monitoring for total toxic organics (TTO). In lieu of the required monitoring, the facility can choose to submit a certification statement stating that they do not discharge any TTO every six months.

Regulatory Requirement

The federal regulations at 40 CFR 433.12(a) require “In lieu of requiring monitoring for TTO, the permitting authority (or, in the case of indirect dischargers, the control authority) may allow dischargers to make the following certification statement: “Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority.” For direct dischargers, this statement is to be included as a “comment” on the Discharge Monitoring Report required by 40 CFR 122.44(i), formerly 40 CFR 122.62(i). For indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e). If monitoring is necessary to measure compliance with the TTO standard, the industrial discharger need analyse for only those pollutants which would reasonably be expected to be present.”

Finding C.4.a.2 – The Lepko permit does not state whether the facility should be classified as an existing or new source.

There is no language within the permit that states whether the facility is a new or existing source.

Regulatory Requirement

The federal regulations at 40 CFR 403.6 contain requirements for categorical industrial users including the applicability of new and existing user categorical standards and Control Authority requirements.

Finding C.4.b- Local limits were adopted but not incorporated into IU permits.

On April 18, 2023, local limits were adopted in the most updated sewer use ordinance, but were not incorporated into the general control mechanism.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) state that, “Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions: ... Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;”

Finding C.4.c– The permits reviewed did not specify sampling frequency or location.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require general control mechanisms to be enforceable and contain “Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law.”

Finding C.4.d – The permits reviewed did not specify that the records retention period may be extended at the request of the State or EPA.

The IU discharge permits reviewed address record retention being extended beyond 3 years but is missing the language from 40 CFR 403.12(o)(3) that includes “...or when requested by the Director or the Regional Administrator.”

Regulatory Requirement

Record keeping requirements at 40 CFR 403.12(o)(2) require any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). *This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.*

Finding C.4.e – The permits reviewed do not contain the requirement for notification of changes affecting the potential for a slug discharge.

The permits reviewed were missing language that would require IU’s to notify the POTW in case of process changes that would affect the potential for a slug discharge.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(vi) state “Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge.”

Finding C.4.f – Permits reviewed were missing the requirement to develop and maintain a slug discharge control plan.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(6) contain requirements that individual control mechanisms “must be enforceable and contain, at a minimum, the requirements to control Slug Discharges, if determined by the POTW to be necessary.”

D. Application of Pretreatment Standards and Requirements

1. Does the CA apply all applicable pretreatment standards? (40 CFR 403.8(f)(1)(ii) and 403.8(5))

Yes, other than as noted in Finding C.4.a and Finding C.4.b in the above section.

2. Has the CA evaluated the need for SIUs to develop slug discharge control plans? (40 CFR 403.8(f)(2)(vi))

Yes, the Facility representatives stated that all SIUs are evaluated to determine the need for a slug discharge control plan (SDCPs).

E. Compliance Monitoring

- 1. Has the CA inspected and independently sampled each SIU at least once a year? Middle tier CIUs at least once every two years? Sample once during term of CIU control mechanism if CIU sampling waived for pollutants not present? (40 CFR 403.8(f)(2)(v), 403.12(e)(2), 403.12(e)(2))**

Yes, based on the SIU files reviewed and responses from the Facility representatives, the Facility has been conducting inspections once a year and sampling twice per year. Facility representatives stated that they conduct all sampling at IUs. Sampling is done typically in April/ May and September. Samples are run in house for pH, Ammonia, Total Suspended Solids (TSS), CBOD, and total Phosphorus. All other lab analytics are performed by Microbac Lab in Pittston, PA. The WWTP does not require any IU to conduct self- monitoring or submit any self-monitoring reports.

- 2. Has the CA used proper sampling and analysis procedures (40 CFR Part 136) and inspection procedures? Were the procedures done with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions? (40 CFR 403.8(f)(2)(v) and (vii), 403.12(g)(5))**

In general, according to the information reviewed during the inspection, the Facility uses proper sampling, analysis, and inspection procedures, except where noted below.

Finding E.2 – The Facility is not collecting flow-proportional composite samples at SIUs.

According to the Facility representatives, the Facility is collecting time-proportional composite samples at all SIUs, but the inspection team did not find any documentation in the file to support the use of time-proportional samples.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include “[s]elf-monitoring, sampling, reporting, notification, and record keeping requirements.”

The federal requirements in 40 CFR Part 403.12(g)(3) require 24-hour composite samples “must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities.”

Finding E.3 – The facility is not collecting grab samples for pH.

According to facility records, pH is collected as time-proportional composite samples rather than grab samples.

Regulatory Requirement

The federal requirements in 40 CFR 403.12(g)(3) state "Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds."

Finding E.4 – The facility is not analyzing pH within the required holding time.

The records reviewed indicated that pH was analyzed after the required holding time of 15 minutes. In all records reviewed, the holding time was exceeded for all pH measurements.

Regulatory Requirement

The federal requirements in 40 CFR 403.7(b)(2)(iv) state "A grab sample is an individual sample collected over a period of time not exceeding 15 minutes."

3. Has the CA kept records for three years including the following? (40 CFR 403.12(o))

- a. Period compliance reports and other reports/notices
- b. All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results
- c. BMP compliance documentation
- d. Other monitoring records

Based on the files reviewed, the Facility maintains records for at least three years.

4. Has the CA evaluated, at least once per year, whether NSCIUs continue to meet the criteria of an NSCIU? (40 CFR 403.8(f)(2)(v)(b), 403.3(v)(2))

No facilities are classified as NSCIU.

5. Has the CA required, received, and analyzed reports and other notices from SIUs? (40 CFR 403.8(f)(2)(iv))

- a. Self-monitoring reports
- b. BMRs and 90-day compliance reports
- c. Compliance schedules reports
- d. Notice of slug loading or potential problems at POTW
- e. Notification of spills, bypasses, upsets, etc.
- f. Notification of significant change in discharge
- g. 24-hour notification of effluent violation
- h. Resampling results within 30-days
- i. Other reports/notifications required by the CA

Yes, RR Donnelley had one copper exceedance on May 21, 2024 and one resample event on June 11,

2024. Notification was provided to the Facility staff within 24 hours, and the resample results reported immediately.
6. Have SIUs monitored to demonstrate continued compliance and re-sampled after violation(s)? (40 CFR 403.12(g)(1) & (2)) The WWTP performs all monitoring in lieu of requiring self-monitoring. Based on the files reviewed, SIUs have been re-sampled after violations.
7. Has the CA ensured CIUs report on all regulated pollutants at least once every 6 months? (40 CFR 403.12(e)(1) & (g)(1)) Yes. Based on the CIU files reviewed during the inspection, the Facility has ensured that CIUs have reported on regulated pollutants at least once every six months.
8. Has the CA ensured non-categorical SIUs self-monitor and report at least once every 6 months with a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority? (40 CFR 4.312(h) & (g)(1)) Yes.
9. Has the CA required self-monitoring reports from CIUs to be signed and certified? (40 CFR 403.12(b)(6), 403.12(l)) Not applicable, as the Facility does not require self- monitoring reports.
10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12 (j) & (p)) No, the Facility representative stated that the Facility has not received notification of hazardous waste discharges from any of the SIUs.
F. Enforcement
1. Has the CA implemented its enforcement response plan ("ERP")? (40 CFR 403.8(f)(5)) Yes, based on the files reviewed by the Inspection Team and responses from the Facility Representative, the Facility has been implementing its ERP.
2. Does the CA evaluate both numeric and narrative criteria for significant non-compliance ("SNC") and annually publish a list of IUs in SNC? (40 CFR 403.8(f)(2)(viii)) Yes, the Facility evaluates SNC according to the definition in its SUO. The Facility publishes a list of SIUs in SNC in <i>The Morning Call</i> .

2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.

Not applicable.

3. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A))

The Facility representatives said there are no SIUs under a compliance schedule.

4. Has the CA ensured CIU compliance within 3 years of standards effective date (or less than 3 years where required by standard)? (40 CFR 403.6(b))

Not applicable.

5. Has the CA ensured CIUs submit complete baseline monitoring reports (BMRs) and 90-day compliance reports within the required time frames? (40 CFR 403.12(b) & (d))

Not determined.

G. Additional Evaluations

1. Hauled Waste

Quakertown WWTP does accept hauled waste, approximately 900,000 gallons per year. The WWTP does not accept any hazardous waste; only septic waste.

2. Dental Mercury Program

In 2022, Quakertown conducted a dentist survey that identified 18 dentists within the service area. All dentists had provided a one- time certification and all had installed an amalgam separator.

3. Fats, Oils, and Grease (FOG) Program

The Facility does not have a FOG program. Facility representatives stated they were not aware of any issues in the collection system due to grease.

H. Closing Conferences

After the inspections of Lepko Finishing, Inc. and RR Donnelley, the EPA Inspection Team conducted individual closing conferences at each facility. The Inspection Team shared preliminary observations about each facility and reiterated that all preliminary observations discussed were not compliance determinations. 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 EPA Inspection Team conducted a closing conference on August 29, 2024 summarizing both observations from the IU site visits and the file review at Quakertown WWTP. This concluded the PCI.

Attachment A

Industrial User Site Visit Data Sheets

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: RR Donnelley					
Address of industry: 100 American Dr. Quakertown, PA 18951					
Date of visit: 8/29/2024			Time of visit: 10:00 AM – 12:00 PM		
Name of inspectors: Justin Reiss, Quakertown WWTP Angela Weisel, Erin DeSandro, and Amrita Gupta, EPA Region 3 Chuck Durham, PG Environmental					
Provide the name(s) and title(s) of industry representative(s)					
Name			Title		
John Kiegler Chris Provencher			Director of Operations Operations Manager		
IU Permit Number: 14		Exp. Date: 4/12/2027		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: Facility prints different types of high security forms: printing forms, cutsheet, continuous lithyl offset printing, and labels.					
2. Number of employees:		80		Number of shifts: 3	
				Hours of operation: 7 AM - 3 PM; 3 PM - 11 PM; 11 PM - 7 AM	
3. Wastestream flow(s) discharged to the POTW: Process wastewater is primarily generated during plate pressing. The flow comes directly from the post developer machine and the film developer machine during the plate pressing process. The excess chemicals used during these processes make up the wastestream.					
Sanitary:		Not provided (gpd)		Process: 1,999 (gpd)	
				Combined: Not provided (gpd)	
4. Describe any significant changes in process or flow: The facility has recently added label making machines. They should not affect process or flow.					
5. Type of pretreatment system (Describe): None					
Continuous flow		Batch		x Combined	
6. Process area description (identify raw materials and processes used) The process area of the plant consists of making a plate to press into the paper for embossing. "Developer" is run though the machine to develop film and becomes "fixer" or waste that is rinsed off and stored for disposal. The pre-press machine uses "plate finisher" to coat the plates in a gum- like substance. The plates are rinsed again, and waste is stored for disposal. Process wastewater also comes from the 2 boilers as blow- off steam.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): The chemical storage area for the process area is in a separate, fenced area with secondary containment with no floor drains. The storage area for hazardous waste is located outside within a trailer. There were several hazardous waste drums stored in the trailer with missing labels. There were no labels indicating how long the drums had been there, or when they were supposed to be picked up.			
Any floor drains?	Yes - 1	Any spill control measures?	Yes, spill kits and secondary containment pallets
8. Are hazardous wastes drummed and labeled? Yes – some need pickup labels			
9. Does the IU have hazardous waste manifests? Yes			
10. Solid waste production and disposal: Safety-Kleen hauls all hazardous waste (chemicals used in plate pressing area)			
11. Description of sample location and methods: Quakertown WWTP samples from one of the manholes outside of the facility.			
Notes:			
The inspection team observed a 55-gallon drum hanging off of a secondary containment pallet. See Photograph 7 in Attachment B below.			

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Lepko Finishing, Inc.					
Address of industry: 118 N. Hellertown Ave Quakertown, PA 18951					
Date of visit: 8/29/2024			Time of visit: 1:00 PM – 2:00 PM		
Name of inspectors: Justin Reiss, Quakertown WWTP Angela Weisel, Erin Desandro, and Amrita Gupta, EPA Region 3 Chuck Durham, PG Environmental					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Joseph Lepko		President			
Matthew Lepko		Vice President			
IU Permit Number: 21		Exp. Date: April 27, 2027		IU Classification: Metal finisher (CIU)	
Please provide the following documentation:					
1. Nature of operation: The facility is a metal finisher coating metal, plastic, or wood. There are two powder-coating lines and one water-based paint line. Wastewater is primarily from wash water from the powder-coating lines.					
2. Number of employees:		10		Number of shifts:	
				1	
				Hours of operation:	
				8 AM – 4:30 PM M-F	
3. Wastestream flow(s) discharged to the POTW: Wastewater is primarily from washer on powder-coating line.					
Sanitary:		Not provided (gpd)		Process:	
				1,600 (gpd)	
				Combined:	
				Not provided (gpd)	
4. Describe any significant changes in process or flow: None					
5. Type of pretreatment system (Describe): None					
Continuous flow		X		Batch	
				Combined	
6. Process area description (identify raw materials and processes used) For the powder-coating line, the process consists of an alkaline cleaner, then a water rinse, then a phosphoric acid rinse, and then a reverse osmosis water rinse before heading to the oven for drying and painting. The water-based paint line sprays paint and does not have any washing.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): The chemical storage area consists of many 55-gallon drums. Waste consists of cleaning solvent and unused paints. There are no floor drains in the area, and there are no secondary containment pallets in use.			
Any floor drains?	No	Any spill control measures?	Yes, spill kits.
8. Are hazardous wastes drummed and labeled? Yes, but without secondary containment			
9. Does the IU have hazardous waste manifests? Yes, included as Attachment C			
10. Solid waste production and disposal: Veolia Waste Management hauls waste away quarterly			
11. Description of sample location and methods: Quakertown WWTP samples from the manhole outside of the facility on the western side.			
Notes:			
Chemicals were stored in 55-gallon drums without any secondary containment pallets.			

Attachment B

Industrial User Site Visit Photograph Log



Photograph 1: "Developer" in the plate processing area at RR Donnelley.



Photograph 2: "Fixer" in plate processing area at RR Donnelley.



Photograph 3: “Plate finisher” in plate processing area at RR Donnelley.



Photograph 4: Where finisher and used finisher are stored in the plate processing room at RR Donnelley.



Photograph 5: Process waste pipe entering system at RR Donnelley.



Photograph 6: Process waste entering drain at RR Donnelley.



Photograph 7: Chemical storage at RR Donnelley.



Photograph 8: Chemical storage at RR Donnelley.



Photograph 9: Drum hanging off of the secondary containment pallet at RR Donnelley.



Photograph 10: Hazardous waste awaiting pickup and missing proper labelling stored in trailer at RR Donnelley.



Photograph 11: Spill kit storage area at RR Donnelley.



Photograph 12: Sampling point at RR Donnelley.



Photograph 13: Powder coating tanks used for rinses at Lepko.



Photograph 14: Levers that control water levels on powder coat lines at Lepko.



Photograph 15: 55-gallon drums stored at Lepko without secondary containment.



Photograph 16: Sampling point at Lepko.

Attachment C

Waste Manifest Provided by Lepko

Quakertown Wastewater Treatment (PA0020290)
Pretreatment Compliance Inspection

Form Approved. OMB No. 2050-0039

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number PA0000114026		2. Page 1 of 1		3. Emergency Response Phone (877) 418-0067		4. Manifest Tracking Number 001720698 VES					
		5. Generator's Name and Mailing Address LEPKO FINISHING 113 N HELLERTOWN AVE QUAKERTOWN, PA 18951-1317 Generator's Phone: 715 539-6717		Generator's Site Address (if different than mailing address) SAME									
GENERATOR		6. Transporter 1 Company Name VEOLIA ES TECHNICAL SOLUTIONS		U.S. EPA ID Number N J D 0 8 0 6 3 1 3 6 9									
		7. Transporter 2 Company Name		U.S. EPA ID Number									
DESIGNATED FACILITY		8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUTIONS 125 FACTORY LANE MIDDLESEX, NJ 08846		U.S. EPA ID Number N J D 0 0 2 4 3 4 5 4 4									
		Facility's Phone: 732 469-5100											
TRANSPORTER INT'L		9a. HM X		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. UN1263, WASTE FLAMMABLE LIQUIDS, n.o.s., (TOLUENE, XYLENE), 3, E, RQ (D001)		10. Containers No. 10 Type DM		11. Total Quantity 4000		12. Unit Wt./Vol. P		13. Waste Codes F003 D001 F005 D003	
				2.									
		3.											
		4.											
		14. Special Handling Instructions and Additional Information ER Service Contracted by VESTS - Contract retained by generator confers agency authority on initial transporter to add or substitute additional transporters on generator's behalf											
TRANSPORTER		15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
		Generator's/Officer's Printed/Typed Name J. D. LEPKO		Signature <i>[Signature]</i>		Month 1		Day 1		Year 1			
		16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Transporter signature (for exports only): Date leaving U.S.:											
DESIGNATED FACILITY		17. Transporter Acknowledgment of Receipt of Materials		Signature		Month		Day		Year			
		Transporter 1 Printed/Typed Name		Signature		Month		Day		Year			
DESIGNATED FACILITY		18. Discrepancy		18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection		Manifest Reference Number:							
		18b. Alternate Facility (or Generator)		U.S. EPA ID Number									
DESIGNATED FACILITY		Facility's Phone:		Month		Day		Year					
		18c. Signature of Alternate Facility (or Generator)		Signature		Month		Day		Year			
DESIGNATED FACILITY		19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
		1.		2.		3.		4.					
DESIGNATED FACILITY		20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
		Printed/Typed Name		Signature		Month		Day		Year			