REGION 3
PHILADELPHIA, PA 19103

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	July 30, 2024
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment Compliance Inspection
Facility Name:	Greater Uniontown Joint Sanitary Authority
Facility Address:	90 Romeo Lane, Uniontown, PA 15401
Facility Latitude:	39.91483
Facility Longitude:	-79.72322
County/Parish:	Fayette County
Permit No:	PA0027219
NAICS Code:	221320
SIC:	4952
Unique Project #:	ECAD-459

Facility Representatives:	**Point of Contact**
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Marie Hartman, Senior Manager (LSSE) (Consultant for GUJSPA)	
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Inspectors:

Chuck Durham, Eastern Research Group
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(Full list of additional attendees in Table 1)

Report Preparer Signature/Date

Yatasha Moore — Digitally signed by Yatasha Moore Date: 2024.10.10 16:12:49 -05'00'

Yatasha Moore, Eastern Research Group — Date

Supervisor Signature/Date

JESSICA DUFFY — Digitally signed by JESSICA DUFFY Date: 2024.10.10 07:35:44 -04'00'

Jessica Duffy, NPDES 2 Section Chief Enforcement and Compliance Assurance Division — Date

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

I. Inspection Summary

Upon arrival at the Greater Uniontown Joint Sanitary Authority (GUJSA or Facility), EPA contractors Chuck Durham and Yatasha Moore, and United States Environmental Protection Agency (EPA) Region 3 representative Erin DeSandro (jointly referred to as the Inspection Team), met with the Facility representatives. See Table 1 below for a full list of attendees. The Facility owns and operates the Uniontown Sewage Treatment Plant (STP). The inspectors discussed the purpose and format of the pretreatment compliance inspection (PCI or inspection) and interviewed the Facility representatives about the Facility's pretreatment program. The weather was cool and rainy throughout the week during the inspection.

Table 1: Additional Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Erin DeSandro	Environmental Protection Agency	(215) 814-2125	Desandro.Erin@epa.gov
Chuck Durham	EPA Contractor, Eastern Research Group	(615) 888-2928	Chuck.Durham@erg.com
Yatasha Moore	EPA Contractor, Eastern Research Group	(615) 776-3169	Yatasha.Moore@erg.com
Site/Facility Representatives			
Dave Depetris	General Manager – GUJSA	(724) 438-5844	ddepetris@dujspa.com
Marie Hartman	Senior Project Manager – LSSE (Consultant for GUJSA)	(412) 264-4400 ext. 246	mhartman@lsse.com
Ken Parks	Consultant – LSSE (Consultant for GUJSA)	Not Provided	kparks@lsee.com
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:

- Chestnut Valley Landfill (non-categorical significant industrial user [SIU])
- United Dairy (SIU)

As part of the inspection, the Inspection Team also conducted site visits at United Dairy and Nobelclad (a non-significant industrial user). Upon arrival at each site visit, the Inspection Team presented credentials to the industry representatives. The Inspection Team informed industry representatives that any information that the industry 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.

The last EPA Region 3 review of the Facility's pretreatment program was a Field Audit performed in 2017.

II. Program Description
The Uniontown STP has a design capacity of 12 million gallons per day (MGD) with an average flow of 6.5 MGD for the January – June 2024 period. The Uniontown STP provides secondary treatment and disinfection with ultraviolet light. Solids are hauled to Chestnut Valley Landfill for disposal. According to the Facility representatives, GUJSA accepts wastewater from the City of Uniontown, North Union Township, and South Union Township. The Facility does not own or operate the collection system in any of the contributing jurisdictions.

III. Industrial User (IU) Characterization		
IUs currently identified by the Control Authority (CA)	**IU Type**	
2	**Discharging Significant Industrial Users**	
	2	**Discharging Non-Categorical SIUs (as defined by the CA)**
	0	**Categorical Industrial Users (CIUs)**
	0	**Middle Tier CIUs**
0	**Zero-Discharging CIUs**	
0	**Non-significant CIU (NSCIU)**	
1	**Other Regulated IUs (e.g., permitted IUs)** **Describe:** Nobelclad discharges ~.	
0	**Waste Haulers** **Describe:** The Facility does not accept hauled waste at the Uniontown STP.	

IV. Findings Summary Table
Finding A.1 – The Facility was unsure of the date of the most recent revisions to the Sewer Use Ordinance (SUO) and Enforcement Response Plan (ERP).
Finding A.2 – The Facility was unable to provide copies of agreements with each contributing jurisdiction that were in effect at the time of the inspection.
Finding B.1 – The Facility does not have procedures for identifying all SIUs.
Finding C.4.a – The permits reviewed did not clearly specify the sample location and discharge point.
Finding C.4.b – The permits reviewed contain an incorrect monitoring frequency for some parameters.
Finding C.4.c – The United Dairy permit contains an incorrect timeframe for notifying the Facility of a violation that occurs during self-monitoring.
Finding C.4.d – The United Dairy permit contains incomplete requirements for permit transfers.
Finding C.4.e – The permits reviewed did not contain the correct sample types for self-monitoring.
Finding C.4.f – The permits reviewed did not include record-keeping requirements.
Finding C.4.g – The United Dairy permit did not require the SIU to notify the Facility of bypasses.
Finding C.4.h – The permits reviewed did not require the SIU to notify the Facility of significant changes in the industry's discharge.
Finding C.4.i – The permits reviewed contain requirements for the Facility.

IV. Findings Summary Table
Finding C.4.j – The permits reviewed did not include a requirement for the industry to notify the Facility of changes affecting the potential for a slug discharge.
Finding C.4.k – The permits reviewed did not include the amount of civil and criminal penalties.
Finding D.2 – The Facility has not documented slug discharge control plan evaluations for each SIU.
Finding E.1 – The Facility did not have documentation of annual compliance monitoring and inspections at each SIU.
Finding E.3 – The Facility failed to maintain records for at least three years.
Finding E.5 – The Facility was not maintaining self-monitoring reports from its SIUs.
United Dairy Site Visit Data Sheet – The Inspection Team observed chemicals not fully in secondary containment near floor drains.
United Dairy Site Visit Data Sheet – The Inspection Team observed a leaking gasket in the tanker wash area.
United Dairy Site Visit Data Sheet – The Inspection Team observed a sink without signage in the lab.

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)

The Uniontown STP NPDES permit was reissued in 2022, and the Facility submitted local limits to EPA Region 3 for review in February 2024.

Finding A.1 – The Facility was unsure of the date of the most recent revisions to the Sewer Use Ordinance (SUO) and Enforcement Response Plan (ERP).
At the time of the inspection, the Facility representatives could not locate a copy of the SUO. The Facility representatives were able to locate the Enforcement Response Guide section of the ERP and templates for some enforcement documents. However, the Facility representatives could not locate the entire ERP. Therefore, the Facility representatives could not determine the dates these documents were adopted.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1) require the Facility to have the legal authority to operate its pretreatment program. "Such authority may be contained in a statute, ordinance, or series of contracts or joint powers agreements which the POTW is authorized to enact, enter into or implement, and which are authorized by State law."

The federal regulations at 40 CFR 403.8(f)(5) require the Facility to "develop and implement an enforcement response plan."

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

According to the Facility representatives, GUJSA accepts wastewater from the City of Uniontown, North Union Township, and South Union Township. The Facility does not own or operate the collection system in any of the contributing jurisdictions.

Finding A.2 – The Facility was unable to provide copies of agreements with each contributing jurisdiction.
At the time of the inspection, the Facility representatives were unable to verify if the Facility has agreements with each contributing jurisdiction. The Facility representatives were able to locate agreements that were adopted in 1981, which was prior to the creation of GUJSA. However, the Facility representatives could not locate updated agreements that state who is responsible for pretreatment activities in the contributing jurisdictions.

Regulatory Requirement
The federal regulations at 40 CFR 403.8(f)(1) require the Facility to have the legal authority to operate its pretreatment program. "Such authority may be contained in a statute, ordinance, or series

of contracts or joint powers agreements which the POTW is authorized to enact, enter into or implement, and which are authorized by State law."

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))

Finding B.1 – The Facility does not have procedures for identifying all SIUs.
The Facility representatives stated that new users apply for service through the contributing jurisdictions, and the Facility has to approve all new service connections. However, the Facility does not have procedures for identifying news users that move into existing buildings or changes at existing users. Additionally, Facility representatives were unable to determine the last time an Industrial Waste Survey (IWS) was conducted.

Regulatory Requirement
The federal regulations at 40 CFR 403.8(f)(2)(i) require the Facility to develop and implement procedures to "identity and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program."

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))

No, as noted in Finding E.1 below, the Facility has not identified the character and volumes of pollutants contributed to the POTW by all IUs.

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 SIUs, which it submits in the annual reports to EPA Region 3. The facility had not designated any SIUs as NSCIUs at the time of the inspection.

C. Control Mechanism Evaluation

1. Has the CA issued individual or general control mechanisms to all SIUs? (40 CFR 403.8(f0(1)(iii))

All SIUs whose files were reviewed during the inspection had been issued an individual permit. SIU permits are issued for 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)

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 SIU permits reviewed as a component of the inspection included most, but not 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 clearly specify the sample location and discharge point.

The United Dairy and Chestnut Valley Landfill permits both described the sample location and discharge point as "plant outfall downstream of flow equalization tank." The sample location description in the permits does not provide enough detail to ensure anyone collecting samples could be sure of the precise sample location.

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, 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."

Finding C.4.b – The permits reviewed contain an incorrect monitoring frequency for some parameters.

The United Dairy permit required the SIU to perform self-monitoring annually for arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, and zinc. The Chestnut Valley Landfill permit required the SIU to perform annual self-monitoring for 11 of the 16 parameters for which monitoring is required.

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 regulations at 40 CFR 403.12(h) state "Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by the Control Authority) a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority."

Finding C.4.c – The United Dairy permit contains an incorrect timeframe for notifying the Facility of a violation that occurs during self-monitoring.

The United Dairy permit requires the SIU to notify the Facility within 24 hours of a violation. This is more stringent than the federal requirement and could be impractical for the SIU to meet depending on how long it takes for the SIU to receive analytical results.

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 regulations at 40 CFR 403.12(g)(2) state "If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation."

Finding C.4.d – The United Dairy permit contains incomplete requirements for permit transfers.

Part 4.L of the United Dairy permit discusses several requirements for transferring the permit. However, the permit does not include a provision for the new owner/operator to receive a copy of the current permit.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(2) require permits to include a "[s]tatement of non-transferability without, at a minimum, prior notification to the POTW and provision of a copy of the existing control mechanism to the new owner or operator."

Finding C.4.e – The permits reviewed did not contain the correct sample types for self-monitoring.

The United Dairy permit required certain parameters to be sampled using 24-hour composite samples. The Chestnut Valley Landfill required all self-monitoring to be performed using 24-hour composite samples. However, neither permit specified if the composite samples are to be collected as flow-proportional or time-proportional composite 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 regulations at 40 CFR 403.12(g)(3) states "Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 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 C.4.f – The permits reviewed did not include record-keeping requirements.

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 regulations at 40 CFR 403.12(o)(2) require industrial users to maintain records for at least three years. "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.g – The United Dairy permit did not require the SIU to notify the Facility of bypasses.

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 regulations at 40 CFR 403.17 require industrial users to notify the Facility of bypasses.

Finding C.4.h – The permits reviewed did not require the SIU to notify the Facility of significant changes in the industry's discharge.

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 regulations at 40 CFR 403.12(j) require industrial users to "promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge."

Finding C.4.i – The permits reviewed contain requirements for the Facility.

The United Dairy and Chestnut Valley Landfill permits included requirements for the Facility which could cause the permit to be misinterpreted as a contract, which is not considered an adequate control mechanism. For example, Part I.G of the Chestnut Valley Landfill permit states "permittee agrees that GUJSPA shall have the right to…."

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 regulations at 40 CFR 403.12(j) require industrial users to "promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge."

Finding C.4.j – The permits reviewed did not include a requirement for the industry to notify the Facility of changes affecting the potential for a slug discharge.

Regulatory Requirement
The federal regulation at 403.8(f)(1)(iii) requires the Facility to "control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements."

Finding C.4.k – The permits reviewed did not include the amount of civil and criminal penalties.
The United Dairy and Chestnut Valley Landfill permits state that the SIU may be subject to civil or criminal penalties. However, the permits do not include the maximum civil and criminal penalty amounts.

Regulatory Requirement
The federal regulation at 403.8(f)(1)(iii)(B)(5) requires the permits to include a "statement of applicable civil and criminal penalties for violation of Pretreatment Standards and requirements, and any applicable compliance schedule."

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))**

Based on the permits reviewed the Facility applies all applicable pretreatment standards correctly.

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

Finding D.2 – The Facility has not documented slug discharge control plan evaluations for each SIU.
According to the Facility representatives, the previous GUJSA staff may have evaluated each SIU for the need to develop a slug discharge control plan. However, the Facility representatives were unable to locate these evaluations at the time of the inspection.

Regulatory Requirement
The federal regulations at 40 CFR 403.8(f)(2)(vi) require the Facility to "evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User."

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))**

Finding E.1 – The Facility did not have documentation of annual compliance monitoring and inspections at each SIU.
The Facility representatives stated that compliance monitoring was conducted annually by previous GUJSA staff. However, the Facility representatives were unable to provide documentation of annual compliance monitoring being conducted at each SIU at the time of the inspection. The Facility representatives were unable to provide documentation of any inspections conducted at each SIU since 2021.

Regulatory Requirement
The federal regulations at 40 CFR 403.8(f)(2)(v) require the Facility to "inspect and sample the effluent from each Significant Industrial User at least once a year."

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))**

As noted in Finding E.1 above, the Facility has not documented compliance monitoring and inspections at its SIUs.

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**

Finding E.3 – The Facility failed to maintain records for at least three years.
As noted in Finding E.1 above, the Facility was unable to provide documentation of inspections and compliance monitoring that was conducted by staff previously employed by GUJSA prior to November 2023.

Regulatory Requirement
The federal regulations at 40 CFR 403.12(o)(2) require the Facility to maintain records for at least three years. "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."

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))

N/A. The Facility was not implementing the option to classify industries as NSCIUs at the time of the inspection. The Facility has not adopted any of the optional provisions of 40 CFR Part 403 and is prohibited from doing so because the State of Pennsylvania has not adopted them into their state regulations.

5. Has the CA required, received, and analyzed reports and other notices from SIUs? (40 CFR 403.8(f0(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

Finding E.5 – The Facility was not maintaining self-monitoring reports from its SIUs.
The Facility was unable to locate self-monitoring reports for United Dairy at the time of the inspection. The Inspection Team found self-monitoring reports from 2020 in the Chestnut Valley Landfill file, but nothing associated with monitoring requirements for discharge permit currently that was issued in August of 2021 and still in effect.

Regulatory Requirement
The federal regulations at 40 CFR 403.8(f)(2)(iv) require the POTW to "[r]eceive and analyze self-monitoring reports and other notices submitted by Industrial Users."

6. Have SIUs monitored to demonstrate continued compliance and re-sampled after violation(s)? (40 CFR 403.12(g)(1) & (2))

As noted in Findings E.3 and E.5 above, the Facility did not have the records available to determine if SIUs monitored to demonstrate continued compliance with their respective current permits and resampling 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))

N/A. The Facility did not have any CIUs at the time of the inspection.

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))

As noted in Findings E.3 and E.5 above, the Facility did not have the records available to determine if non-categorical SIUs self-monitor and report at least once every six months.

9. Has the CA required self-monitoring reports from CIUs to be signed and certified? (40 CFR 403.12(b)(6), 403.12(l))

N/A. The Facility did not have any CIUs at the time of the inspection.

10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12 (j) & (p))

No, the Facility representatives 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))

As noted in Finding A.1 above, the Facility was unable to determine if the ERP has been adopted. According to the Facility representatives, the Facility had not taken any enforcement actions in 2024.

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 stated that they would evaluate SNC according to the definition in its SUO. The Facility publishes a list of SIUs in SNC in *The Hearld Standard*.

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

No, the Facility did not have any SIUs in SNC in the last year.

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

There were no SIUs under a compliance schedule at the time of the Inspection. As noted in Finding A.1 above, the Facility representatives were unable to provide documentation showing that the SUO and ERP on file were adopted and in effect. Therefore, the Facility may or may not have the legal authority to develop and implement compliance schedules.

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))

N/A. The Facility has not identified any new CIUs or CIUs subject to a new categorical standard.

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))**

N/A. The Facility did not have any CIUs. Therefore, the did not review BMRs or 90-day monitoring reports as part of the review as they are applicable to CIUs only.

G. Additional Evaluations

1. Dental Mercury Program

According to the Facility representatives, there are 19 dental facilities in the service area and the Facility has received the one-time certification statements from all 19 dental facilities. The Facility does not permit or inspect dental facilities.

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

The Facility does not issue permits to food service establishments and does not operate a FOG program.

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: Nobelclad

Address of industry: 1138 Industrial Park Drive, Mt Braddock, PA 15465

Date of visit: 7/30/2024	Time of visit: 11:00 am – 12:00 pm

Name of inspectors:
Dave Depetris (GUJSA)
Ken Parks (LSSE)
Chuck Durham (Eastern Research Group)
Erin DeSandro (EPA Region 3)

Provide the name(s) and title(s) of industry representative(s)

Name	Title
Jason Kerney	HR/HSE Manager

IU Permit Number: 16-003	Exp. Date: N/A	IU Classification: Non-significant IU

Please provide the following documentation:

1. Nature of operation: The facility performs explosion welding to bond two different metals.

2. Number of employees:	84	Number of shifts:	3	Hours of operation:	24 hours/day, Monday-Friday

3. Wastestream flow(s) discharged to the POTW:

The industrial user generates wastewater from the waterjet overflow.

Sanitary:	Not provided	Process:	~100 gpd	Combined:	Not provided

4. Describe any significant changes in process or flow: None.

5. Type of pretreatment system (Describe): Wastewater flows from the waterjet to the pretreatment system. Flocculant is added for metals removal. The wastewater is then pumped to a settling tank. Wastewater then flows through a sock filter and then to final settling tank before being discharged to sewer.

	Continuous flow	X	Batch		Combined

6. Process area description:
The facility receives metals (carbon steel, titanium, and nickel alloys). The metals are seam welded. After welding, the material is belt sanded. The welded material is then pressed and ultrasonic tested.

7. Chemical storage area:
The facility stores acetone in 55-gallon drums and propane in tanks.

Any floor drains?	No	Any spill control measures?	Spill kits

8. Are hazardous wastes drummed and labeled? Yes. Spent coolants/lubricants from the machine shop are moved to the mine site and shipped offsite with used oils. The mine site is the underground area where the explosion bonding process takes place.

9. Does the IU have hazardous waste manifests? Yes.
10. Solid waste production and disposal: Solid waste is recycled by Specialty Metals.
11. Description of sample location and methods: GUJSA collects all samples in lieu of requiring the industry to conduct self-monitoring. Samples are collected from the discharge port following the final settling tank.
Notes:
The inspection team did not identify any concerns from this site visit.

IU SITE VISIT DATA SHEET

<table>
<tr><td colspan="6">INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.</td></tr>
<tr><td colspan="6">Name of industry: United Dairy</td></tr>
<tr><td colspan="6">Address of industry: 47 West Craig Street, Uniontown, PA 15401</td></tr>
<tr><td colspan="3">Date of visit: 7/30/2024</td><td colspan="3">Time of visit: 1:45 PM – 3:45 PM</td></tr>
<tr><td colspan="6">Name of inspectors:
Dave Depetris (GUJSA)
Marie Hartman and Ken Parks (LSSE)
Yatasha Moore (Eastern Research Group)
Erin DeSandro (EPA Region 3)</td></tr>
<tr><td colspan="6">Provide the name(s) and title(s) of industry representative(s)</td></tr>
<tr><td colspan="3">Name</td><td colspan="3">Title</td></tr>
<tr><td colspan="3">Chad Snyder</td><td colspan="3">Plant Manager</td></tr>
<tr><td colspan="2">IU Permit Number: 21-001</td><td colspan="2">Exp. Date: July 31, 2026</td><td colspan="2">IU Classification: non-categorical SIU</td></tr>
<tr><td colspan="6">Please provide the following documentation:</td></tr>
<tr><td colspan="6">1. Nature of operation: The facility manufactures milk products (including half-n-half, heavy cream, and chocolate milk), flavored iced tea, orange juice, apple juice, and ice cream mix.</td></tr>
<tr><td>2. Number of employees:</td><td>~110</td><td>Number of shifts:</td><td>2</td><td>Hours of operation:</td><td>6:00 am – 2:30 pm, Monday - Sunday</td></tr>
<tr><td colspan="6">3. Wastestream flow(s) discharged to the POTW:

The SIU generates wastewater from flush out between products, cooling for plastic blow molding of plastic gallon bottles, washing tanks, washing tankers, washing fillers, boiler blowdown, and pasteurizers.</td></tr>
<tr><td>Sanitary:</td><td>Not provided</td><td>Process:</td><td>Not provided</td><td>Combined:</td><td>2.8 MGD</td></tr>
<tr><td colspan="6">4. Describe any significant changes in process or flow: The facility stopped freezing ice cream in 2013. The facility still produces ice cream mix and uses a co-packer to freeze the final product.</td></tr>
<tr><td colspan="6">5. Type of pretreatment system (Describe): “Dirty drains” (drains that could potentially become contaminated with spilled milk) flow to a 68,000-gallon equalization holding tank with a mixer. The pH is adjusted in this tank using 50% sodium hydroxide. Wastewater is discharged to the sewer at a rate of ~70 gallons per minute (gpm).

“Clean drains” from the facility discharge to an unnamed tributary of Red Stone Creek under the facility’s NPDES permit.</td></tr>
</table>

X	Continuous flow		Batch		Combined

6. Process area description:
The facility receives raw milk by tanker trucks. The milk is tested to ensure that it meets the facility's quality standards. Milk is loaded into raw product silos. Milk is then treated using two homogenizers/pasteurizers. Products are then mixed in finished product tanks. Products are quality tested to ensure that they meet the facility's specifications. The final products are then bottled and packaged for shipment.

For drink products, raw ingredients are received into various storage areas. Ingredients are metered into mix tanks. The mixed drinks are pasteurized before going to the finished product tanks. Drinks are then bottled and packaged for shipment.

7. Chemical storage area:
Chemicals for sanitation and clean-in-place were stored in 55-gallon drums and silos in the facility's chemical storage area.

Any floor drains?	Yes	Any spill control measures?	Yes; spill pallets

8. Are hazardous wastes drummed and labeled? N/A. The facility does not generate hazardous waste.

9. Does the IU have hazardous waste manifests? N/A. The facility does not generate hazardous waste.

10. Solid waste production and disposal: Rejected loads of milk are sent to another plant for animal feed or to a farm.

11. Description of sample location and methods: Samples are collected from the discharge from the equalization tank. Samples are collected using a combination of composite and grab samples. Samples are analyzed by the SIU's contract laboratory Environmental Laboratory Services.

Notes:

1. **<u>Finding – The Inspection Team observed chemicals not fully in secondary containment near floor drains.</u>**

   The Inspection Team observed a 55-gallon drum of sanitizer in the tanker wash area that was not fully on secondary containment (see Photograph 1 in Attachment B). Additionally, the Inspection Team observed a 55-gallon drum of CIP3 chemical not fully on secondary containment (see Photograph 2 in Attachment B).

2. **<u>Finding – The Inspection Team observed a leaking gasket in the tanker wash area.</u>**

   The Inspection Team observed a pipe gasket that was leaking water into a floor drain in the tanker wash area. This is an unpermitted discharge that is not part of any discharge process identified in the permit. (see Photograph 3 in Attachment B).

3. **<u>Finding – The Inspection Team observed a sink without signage in the lab.</u>**

   The Inspection Team observed a sink in the lab. According to the facility representatives, the sink discharges to the sewer through the SIU's sanitary connection, and the sink lab is used for washing dishes and handwashing. There was no signage above the sink stating that chemicals should not be disposed down the sink (see Photograph 4 in Attachment B).

Attachment B

Industrial User Site Visit Photo Log

Photograph 1: Sanitary chemical partially on secondary containment pallet at United Dairy.

Photograph 2: CIP3 chemical partially on secondary containment pallet at United Dairy.

Photograph 3: Gasket on pipe leaking at United Dairy.

Photograph 4: Sink in quality lab at United Dairy.