



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 09/11/2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial User Inspection
Site/Facility Name: Quala Services, LLC

Site/Facility Address: 105 Tanker Lane
Parker, PA 16049

Latitude: 41.0924 **Longitude:** -79.6962

County/Parish: Butler County

Permit Number: PAP134851

NAICS Code: 562998

SIC: 7699

Unique Project #: ECAD-502

Site/Facility Representative:

Ken Wyant, Facility Manager

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Point of Contact



EPA Inspector:

Jim Kline

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Date

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I. Introduction

On September 11, 2024, the United States Environmental Protection Agency, Region III (“EPA”) conducted an onsite Industrial User Pretreatment Inspection at Quala Services, LLC (hereinafter, “Quala”). The Facility is located at 105 Tanker Lane in Parker, Pennsylvania. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The EPA is the control authority for the Facility. The EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). The PADEP did not have a representative present for the inspection.

A. Opening Conference

Inspector Kline arrived at Quala on Wednesday, September 11th, 2024, at approximately 12:30PM (**See Attachment #1- Photos #1 & #2**). Upon arrival, Inspector Kline presented his credentials to Mr. Ken Wyant, Facility Manager. Inspector Kline conducted an opening conference. Attending were Inspector Kline and Mr. Wyant. Inspector Kline explained the purpose and scope of the inspection to Mr. Wyant.

Inspector Kline requested that any information that the Quala deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

Mr. Wyant stated the headquarters for Quala is located in Tampa, Florida. Mr. Wyant added, Quala will soon be operating under a new name, Depot Connect International (DCI). Mr. Wyant stated the facility has been operating in Parker for forty years.

Quala has an Industrial Sewer Use Permit issued by the Parker Area Authority (**See Attachment #2**). The permit was effective from March 19, 2020, and expires June 30, 2025. In Section V. Discharge Permit Requirements of the Sewer Use Permit, the discharge point description was not completed by the Parker Area Authority. Mr. Wyant stated Quala submits semi-annual reports to the EPA. Mr. Wyant stated monthly pH monitoring data (**See Attachment #3**) is sent along with Pollutant Management Plan (PMP) Certification (**See Attachment #4**) to the EPA. Inspector Kline asked Mr. Wyant to provide a copy of the PMP. Mr. Wyant stated he would have an electronic copy of the PMP e-mailed to Inspector Kline. On September 17, 2024, Inspector Kline received an e-mail from Mr. Chuck Boyd, Vice President-Environmental at Quala. In that e-mail, Mr. Boyd provided a PMP that was signed and dated September 11, 2024 (**See Attachment #5**).

Mr. Wyant stated there are eight full-time employees at Quala. According to Mr. Wyant, Quala operates Monday through Friday 5:00AM until 5:30PM, and from 7:00AM until 3:30PM on Saturdays. Mr. Wyant stated Quala is closed on Sundays.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with temperatures in the lower 80°s Fahrenheit.

II. Facility Activity

According to Mr. Wyant, Quala is a transportation equipment cleaning (TEC) facility. Mr. Wyant stated they specifically clean tractor trailer tank trailers, and that approximately 98% of their business is the cleaning of tank trailers for the petroleum industry. Inspector Kline asked Mr. Wyant how much waste typically is removed from a tank trailer. Mr. Wyant answered, typically less than five gallons along with some residual solid waste known as heels.

Inspector Kline asked Mr. Wyant to describe the operations that occur at Quala. Mr. Wyant stated before an incoming tank trailer arrives, the customer provides a safety data sheet (SDS) and waste manifest for the contents of the tank trailer. The contents are sampled, and the data is entered into their chemical database. The tank trailer is emptied by pre-flushing and then a final rinse. All emptied wastewater is sent through their wastewater capture and pretreatment.

Inspector Kline asked Mr. Wyant to describe the pretreatment process. Mr. Wyant stated the pretreatment process consists of pH adjustment and solids removal. Mr. Wyant stated the generated wastewater from the rinse tanks is collected in the main sump. From the sump, wastewater is sent into a pH adjustment tank where sulfuric acid is used to lower the pH. Wastewater is then sent to the equalization tank, aerated, and then sent to the reaction tank. In the reaction tank, lime and polymer is added. Following the reaction tank, wastewater is then sent through a three-chambered clarifier. Solids are removed using a filter press. Inspector Kline asked if a waste determination was made for the removed solids. Mr. Wyant stated the solids are non-hazardous. From the clarifier, the wastewater is aerated and sent to the treated water discharge tank, then flow-controlled discharged through a float box and partial flume to the Parker Area Authority. Mr. Wyant stated that the Quala continuously discharges at a rate of about 5 to 10 gallons per minute. Mr. Wyant stated the maximum allowable discharge rate is 19 gallons per minute.

III. Observations

Inspector Kline conducted a tour of Quala. Accompanying Inspector Kline was Mr. Wyant.

Observation #1: The first area visited was the outdoor Equalization and Treated Water Holding Tank Area. Both tanks are located within the same concrete containment sump. Inspector Kline observed the containment sump had noticeable deterioration (**See Attachment #1- Photo #3**). Mr. Wyant stated the containment sump would be repaired.

Inspector Kline observed some standing water in the containment sump. Mr. Wyant stated the water was rainwater and would be sent through the pretreatment process.

Observation #2: Inspector Kline visited the Wastewater Treatment Building. Mr. Wyant again described the process and showed Inspector Kline the actual components of the process.

Observation #3: Inspector Kline visited the Lab located inside the Wastewater Treatment Building. Inspector Kline observed the buffer solutions used for the two-point pH calibration. Inspector Kline observed that both the 7 and 10 buffer solutions had expired (**See Attachment #1- Photo #4**). The 10-buffer solution had expired in April 2024, and the 7-buffer solution expired in August 2024. Mr. Wyant verified that those two buffer solutions were used for pH calibration since April 2024. Mr. Wyant stated replacement buffers would be ordered immediately.

Observation #4: Inspector Kline observed the “Daily Wastewater Effluent pH Log” (**See Attachment #1- Photo #5**). Inspector Kline observed all entries made starting January 2, 2024, until today (September 11, 2024). According to the log, all pH readings were between 8.1 and 9.0.

Observation #5: Inspector Kline observed the Effluent Sampling Location (**See Attachment #1- Photo #6**). Mr. Wyant stated the sample is collected via grab from the discharge pipe that discharges from the “blue box.”

This concluded the physical inspection portion of Quala.

IV. Records Review

In preparation for this inspection, Inspector Kline reviewed the semi-annual PMP Certification letters sent to EPA along with the semi-annual pH Calibration/Sample Analysis Log. The most recent pH Calibration/Sample Analysis Log shows pH measurements recorded in 2024 for: January 2nd, February 1st, March 1st, April 1st, May 1st, June 3rd, and July 1st.

Observation #5: The reported pH measurements were inconsistent with the Daily Wastewater Effluent pH Log. The Daily Wastewater Effluent pH Log reported 8.5 for January 2, 2024, and 8.5 for March 2, 2024 (**See Attachment #1-Photo #5**) while the Monthly pH Calibration/Sample Analysis Log reported 8.7 for January 2, 2024, and 8.3 for March 1, 2024 (**See Attachment #3**).

Inspector Kline completed the Industrial User Checklist with input from Mr. Wyant (**See Attachment #6**).

V. Closing Conference

Inspector Kline conducted a closing conference with Mr. Wyant. Inspector Kline shared preliminary observations about the facility. Inspector Kline reiterated that all the preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference.

VI. Follow-up Communications

Inspector Kline received an e-mail from Mr. Boyd on 9/17/2024. In the e-mail, Mr. Boyd provided photographs of the new 7 and 10 Buffer solutions along with the buffer solution expiration dates (**See Attachment #1- Photos #7 & #8**).

VII. List of Attachments

Attachment 1: Photographs

Attachment 2: Industrial Sewer Use Permit

Attachment 3: Monitoring Data- pH

Attachment 4: Semi-Annual PMP Certification

Attachment 5: Pollutant Management Plan (PMP)

Attachment 6: IU Checklist

Attachment 7: Discharge Limitations and Monitoring Requirements