



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): December 2-3, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Authority Name: City of Salisbury Wastewater Treatment Plant
Permittee(s): Salisbury WWTP

Site/Authority Operator: Salisbury WWTP

Authority Address: 1142 Marine Road, Salisbury, MD 21801
Lat/Long:
County/Parish: Wicomico
Permit Number: MD0021571

Authority Representative:

Melanie Gravenor, Pretreatment Coordinator Salisbury WWTP
Email: mgravenor@salisbury.md
Connie Luffman, Salisbury WWTP Superintendent
Email: cluffman@salisbury.md

Point of Contact



Inspector:

Erin DeSandro, EPA Region 3 NPDES Inspector
Email: Desandro.erin@epa.gov

(List of additional attendees in Table 1)

ERIN DESANDRO Digitally signed by ERIN DESANDRO
Date: 2025.03.10 08:36:46 -04'00'

Report Preparer

Signature/Date

Erin DeSandro, NPDES 2 (3ED33)

Date

Supervisor

Signature/Date

Jessica Duffy, NPDES 2 (3ED33) Section Chief

Date

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

Attachment C NPDES Permit – MD0021571

I. Introduction

On December 2, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a Pretreatment Compliance Inspection (PCI) of the City of Salisbury wastewater treatment plant (hereinafter, “the WWTP”, or “Authority”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the Authority’s National Pollutant Discharge Elimination System (NPDES)’s Permit No. MD0021571 (hereinafter, the “Permit”, **Attachment C**) and all other applicable State and Federal regulations.

Prior to the PCI, State representatives were notified of the inspection. The State did not send a representative to attend the PCI in person. Marjorie Mewbourn from the Maryland Department of the Environment (MDE) joined the opening and closing conferences via phone. The EPA Inspection Team did provide the Authority with advanced notice of the PCI.

As part of the PCI, the Inspection Team conducted a site visit at and reviewed the nondomestic discharger files for:

- Sharp Water – Shannahan Water Company, Inc. (non-categorical significant industrial user ["SIU"])
- Plymouth Tube Company (categorical industrial user ["CIU"] subject to Title 40 of the Code of Federal Regulations [40 CFR] Part 433 Metal Finishing)
- Evolution Craft Brewing (non-categorical significant industrial user ["SIU"])

II. Opening Conference

The EPA Inspection Team arrived at the facility at 11:00 AM EST for the inspection. Inspectors met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Erin DeSandro	EPA Region 3 NPDES Inspector	215-814-2125	DeSandro.Erin@epa.gov
Samuel Magro	EPA Region 3 NPDES Inspector	215-814-3158	Magro.Samuel@epa.gov
Amrita Gupta	EPA Region 3 NPDES Inspector	215-814-3298	Gupta.Amrita@epa.gov
Site/Facility Representatives			

City of Salisbury Wastewater Treatment Plant (MD0021571)
Pretreatment Compliance Inspection

Melanie Gravenor	City of Salisbury, Pretreatment Coordinator	410-548-3180	mgravenor@salisbury.md
Connie Luffman	City of Salisbury, WWTP Superintendent	410-548-3180	cluffman@salisbury.md
State or County Representatives			
Marjorie Mewbourn (via phone)	MDE Pretreatment Coordinator	410-537-3651	Marjorie.mewbourn@maryland.gov

Erin DeSandro, Samuel Magro, and Amrita Gupta displayed their credentials to Melanie Gravenor at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in **Attachment C**. The EPA Inspection Team informed the Industry’s representatives that any information that the industries 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.

II. Program Description

The City of Salisbury has a permitted average flow of 8.5 million gallons per day (MGD). The WWTP does not receive waste from jurisdictions outside of the city of Salisbury. The WWTP does received leachate from the Wicomico County Landfill.

III. Industrial User (IU) Characterization	
IUs currently identified by the Control Authority (CA)	IU Type
5	Discharging Significant Industrial Users
0	Discharging Non-Categorical SIUs (as defined by the CA)
3	Categorical Industrial Users (CIUs)
0	Middle Tier CIUs
3	Zero-Discharging CIUs
	Non-significant CIU (NSCIU)
0	Other Regulated IUs (e.g., permitted IUs) Describe: N/A or Describe
0	Waste Haulers

	Describe: Accepts hauled septage, residential and commercial wastes.
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IV. Observations Summary Table
Observation (1) C.4.a – The permits reviewed did not contain a statement of duration that the permits may not be extended beyond 5 years.
Observation (2) C.4.C – Permits reviewed were missing local limit sampling requirements.
Observation (3) C.4.C – The permit for Evolution Brewing Company did not clearly distinguish what the upper violation limit and surcharge limit for BOD and TSS were.
Observation (4) C.4.D – The permits reviewed did not specify that composite samples must be collected as flow-proportional composite samples.
Observation (5) C.4.e – The permits did not include fines of at least \$1,000 dollars per day for violations.
Observation (6) D.2 – The Authority has not documented determinations of slug discharge control plans required for each of their SIUs.
Observation (7) E.3 – The Authority has not maintained record that they have required baseline monitoring from their CIUs.
Observation (8) F.1 – The Authority has entered a special agreement with Evolution Craft Brewing that is not in line with the Authority’s Enforcement response plan for resolving consistent SNC.
Observation (9) Evolution Brewing Co IU Visit – The industry did not maintain best management practices to prevent slug discharges to the city.

V. Evaluation

The Inspection Team discussed the topics in Subsections A-G below regarding the pretreatment program with the Authority 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 the pretreatment program and includes references to 40 CFR Part 403.

A. Control Authority (CA) Pretreatment Program Modification

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

The Authority's ordinance was most recently revised in 2/12/2018. The Enforcement Response Plan was last updated 1/12/2023.

The Authority last evaluated its local limits in 2005. The limits were approved by MDE on 11/30/05 and incorporated into the ordinance on 2/27/06. Authority Representatives indicated that they are planning to update the local limits when upgrades at the WWTP are completed.

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 Authority does not accept wastewater discharges from jurisdictions outside of Salisbury.

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))

The Authority relies on the City's business licensing office and plumbing inspector to notify them if there is a new business lease or connection. Permits require notification of any changes in wastewater composition or volume to the Authority. The City conducts inspections in instances where they believe the characterization or volume of flow has changed at an industry. Industries that do not currently discharge categorical waste, but have the potential to discharge, are required to submit certification statements.

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 Authority conducts inspections and compliance monitoring at each SIU 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 Authority maintains a current list of SIUs, which it submits in the annual reports to MDE.

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 Authority 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 Authority 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 Authority 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 did not include all the aforementioned provisions. Findings regarding the content of individual control mechanisms are provided below. The Authority had not issued general control mechanisms at the time of the inspection.

Observation (1) C.4.a – The permits reviewed did not contain a statement of duration that the permits may not be extended beyond 5 years.

The IU discharge permits reviewed did not extend beyond 5 years. However, the permits did not include a statement of duration stating that 5 years is the maximum allowable duration.

Regulatory Requirement

Record keeping requirements at 40 CFR 403.12(o)(2) require “Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions... Statement of duration (in no case more than five years)”.

Observation (2) C.4.C – Permits reviewed were missing local limit sampling requirements.

The permits reviewed for Sharp Water and Evolution Craft Brewing did not include the reporting requirements and frequency for all local limits. Categorical and Non-categorical SIU permits require sampling for all local limit parameters.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to include “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.”

Observation (3) C.4.C – The permit for Evolution Brewing Company did not clearly distinguish what the upper violation limit and surcharge limit for BOD and TSS were.

The permit reviewed for Evolution Brewing Company did not differentiate between the surcharge limit and permit limit for BOD and TSS. The limits listed in the permit are consistent with the local limits for these parameters. However, the Authority indicated that Evolution Brewing Company pays surcharges for these parameters as part of their special agreement.

Part 13.12.070 of the ordinance state that, “The city reserves the right to establish, by ordinance or in wastewater discharge permits, more stringent standards or requirements on discharges to the WWTP if deemed necessary to comply with the objectives in Section 13.12.020 of this chapter or the general and specific prohibitions in Section 13.12.070(A) and (B) of this chapter.” The ordinance does not include language that the local limits for any parameters are surcharge limits that can be penalized with no upper limits on the concentration sent to the WWTP.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to include “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.”

The federal regulations at 40 CFR 403.5(c)(1) require each POTW developing a POTW Pretreatment Program pursuant to § 403.8 shall develop and enforce specific limits to implement the prohibitions listed in paragraphs (a)(1) and (b) of this section. Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits. The federal regulations at 40 CFR 403.5(c)(4) state POTWs may develop Best Management Practices (BMPs) to implement paragraphs (c)(1) and (c)(2) of this section. Such BMPs shall be considered local limits and Pretreatment Standards for the purposes of this part and section 307(d) of the Act.

Observation (4) C.4.D – The permits reviewed do not specify that composite samples must be collected as flow-proportional composite samples.

The permits reviewed require composite samples for appropriate parameters that are listed; however, the definition of “composite” in the permits is ambiguous. It is not defined as either flow- or time-proportional composite samples.

Regulatory Requirement

The federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require that control mechanisms include self-monitoring, sampling, reporting, notification, and recordkeeping requirements, including the identification of pollutants to be monitored, sampling location, sampling frequency, and sample type.

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.”

Observation (5) C.4.e – The permits did not include fines of at least \$1,000 dollars per day for violations.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(5) require “Both individual and general control mechanisms...” to contain a “...statement of applicable civil and criminal penalties.” Additionally, 40 CFR 403.8(f)(1)(vi)(A) requires the City to have the legal authority to “seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.” In the July 24, 1990, Federal Register, EPA addressed comments pertaining to incorporation by reference to the proposed amendments to 40 CFR Part 403 that which specified minimum criteria for industrial user permits including applicable civil penalties. In the response to comments, EPA specifically stated that “The Agency believes that incorporation by reference is generally not appropriate because of the importance of effective notice to the significant industrial user of all pretreatment requirements contained in the individual control mechanism.” As a result, the final rule was promulgated in November 1990 maintaining the requirement as it exists still today.

D. Application of Pretreatment Standards and Requirements

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

Yes.

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

Observation (6) D.2 – The Authority has not documented determinations of slug discharge control plans required for each of their SIUs.

City Code 13.12.080 (D) states that the Authority will evaluate whether each IU needs a slug discharge control plan every 2 years. However, the Authority did not have documentation that these

evaluations have occurred. The Authority does request SPCC information from SIUs that are required to maintain them.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(vi) require Control Authorities to evaluate whether each SIU needs a plan or other action to control slug discharges. If the Control Authority requires an SIU to develop and implement a plan, the Control Authority is required at 40 CFR 403.8(f)(1)(iii)(B)(6) to include the requirement for the plan in the SIU's permit.

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 Authority representatives, the Authority has been conducting inspections and sampling at least once per 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))

Yes, according to the information reviewed during the inspection, the City uses proper sampling, analysis, and inspection procedures.

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 Authority 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

Other than as noted below in Observation (7) E.5.b3, the Authority has been requiring, receiving, and analyzing required reports.

Observation (7) E.5.b – The Authority has not maintained Baseline Monitoring Reports (BMRs) for CIUs.

The Authority did not have a records documenting that they are conducting baseline monitoring for their CIUs.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(iv) require Control Authorities to receive and analyze self-monitoring reports and other notices submitted by Industrial Users in accordance with the self-monitoring requirements in § 403.12;

The federal regulations at 40 CFR 403.12(b) detail the reporting requirements for industrial users upon effective date of categorical pretreatment standard including the baseline report requirements.

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

Based on the files reviewed, SIUs have re-sampled after violations to obtain compliance and submitted additional sampling to The Authority.

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))

Other than as noted in Observation (2) C.4.C, the Authority 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))

Other than as noted in Observation (2) C.4.C, the Authority has ensured that CIUs have reported on regulated pollutants 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))

The Control Authority requires all self-monitoring reports must be signed and certified.

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

No, the Authority representative stated that the Authority 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, Authority has been implementing its ERP, with the exception of its special agreements with Evolution Brewing Company, described in Observation 7.

Observation (8) F.1: The Authority has entered a special agreement with Evolution Craft Brewing that is not in line with the Authority's Enforcement response plan for resolving consistent SNC.

The Authority conducts all monitoring for Evolution Craft Brewing as per the 2019 Special Agreement, however, the permit and sampling does not include all local limit parameters and only includes some of the parameters mentioned in previous violations/orders: BOD, TSS, Total Phosphorus, and pH.

As mentioned in Observation 3, the Authority's local limits and the Evolution Brewing Company permit does not distinguish the difference between the Authority's upper limit and the surcharge limit for BOD and TSS. Part 13.12.070 of the ordinance state that, "The city reserves the right to establish, by ordinance or in wastewater discharge permits, more stringent standards or requirements on discharges to the WTW if deemed necessary to comply with the objectives in Section 13.12.020 of this chapter or the general and specific prohibitions in Section 13.12.070(A) and (B) of this chapter." The ordinance does not include language that the local limits for any parameters are surcharge limits that can be penalized with no upper limits on the concentration sent to the WWTP.

The special agreements reviewed do not resolve historical violations. Penalties were waived in the 2019 agreement when the surcharge program was established. However, Evolution Brewing Company is discharging high concentration waste and prohibited pH levels that are potentially harmful to the Authority's system contrary to language in the ordinance, ERP, and 40 CFR 403.5.

The escalation chart in the ERP does not indicate that special agreements without specific compliance schedules for returning to compliance with the limit in the permit are acceptable by the Authority.

Regulatory Requirement:

The federal regulations at 40 CFR 403.8(f)(5) requires the Authority to develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance. The plan shall, at a minimum:

(i) Describe how the POTW will investigate instances of noncompliance;

(ii) Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of industrial user violations and the time periods within which responses will take place.

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 Authority evaluates SNC according to the definition in its SUO. The Authority publishes a list of SIUs in SNC in *The Daily Times*.

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

Yes. Evolution Brewing Company and Pepsi Company.

The Authority and Pepsi Company resolved the outstanding violations that were a result of exceedances with a penalty agreement prior to the facility's closure in December 2024.

Evolution Brewing Company has been in SNC dating back to at least 2017 and prior to several special agreements. The Authority has begun surcharging for BOD and TSS and also pH and FOG. See Observations 8 and 9.

3. 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 Authority has not identified any new CIUs or CIUs subject to a new categorical standard.

4. 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. The BMRs would have been conducted beyond the 3-year record retention period.

However, BMRs should be maintained in the current permit folder. The Authority was unable to find BMRs for any IUs.

G. Additional Evaluations

1. Hauled Waste

The Authority does not accept hauled waste. The Authority does accept leachate from the Wicomico County Landfill. The leachate is sampled in accordance with local limits. The Authority had not permitted the landfill as an SIU at the time of inspection.

The Authority should evaluate if the landfill is required to be permitted in accordance with 40 CFR Part 445 - Landfills Point Source Category.

2. Dental Mercury Program

The Authority initially contacted and informed dental offices of the requirement to submit the one-time certification statement. There has not been a follow-up since the initial survey.

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

The Authority operates a FOG management 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: Sharp Water					
Address of industry: 129 Columbia Road, Salisbury MD 21801					
Date of visit: 12/3/2024			Time of visit: 8:00 AM – 9:20 AM		
Name of inspectors: Melanie Gravenor and Connie Luffman with the City of Salisbury WWTP Erin DeSandro, Samuel Magro, and Amrita Gupta, EPA Region 3					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
DJ Shannahan		Owner, Sharp Water			
Roland Bozman		Plant Manager			
IU Permit Number: 19-1024		Exp. Date: 12/7/2025 (next permit also provided exp. 12/7/2029)		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: Sharp Water provides water treatment systems used for water filtration and removal of PFAS (per- and polyfluoroalkyl substances). This facility regenerates small and large filtration tanks and redistributes the tanks after treatment.					
2. Number of employees:		35	Number of shifts:	1-2	Hours of operation: 7:00 am – 2 am
3. Wastestream flow(s) discharged to the POTW: Process wastewater is generated from overflow from rinse tanks and during cleaning operations.					
Sanitary:	600 (gpd)	Process:	50,000 -60,000 (gpd)		
4. Describe any significant changes in process or flow: No significant change in flow since the Authority last inspected.					
5. Type of pretreatment system (Describe): N/A.					
Continuous flow		X	Batch		Combined
6. Process area description (identify raw materials and processes used) The facility is divided into two sections: small tank regeneration and large quantity regeneration. The small tank area has several stations where portable tanks are attached. The tanks are backwashed with 100% liquid brine until clear. Then reclaimed brine is introduced counter current. Excess brine is pulled of the discharge. The large tank area runs similarly at a larger scale. Anion nitrate resin in chloride form regenerates with salt. It is then saturated with brine twice and cannot be reclaimed.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): Chemicals are stores in double-walled containment tanks throughout the facility.			
Any floor drains?	Yes, drains direct to wastewater pump room.	Any spill control measures?	Yes, shut off valves present to stop discharge to the Authority in the event of a slug.
8. Are hazardous wastes drummed and labeled? N/A, none present.			
9. Does the IU have hazardous waste manifests? Mr. Shannahan provided manifests from Calgon from their last pickup of exhausted carbon on 11/13/2024. Manifests for Clean Harbors most recent pickup was not provided. Mr. Shannahan stated via email, "This is the form that is required so they can test the carbon and provide us with the return authorization. To date we have not yet sent any exhausted PFAS media back to Calgon or to Clean Harbors, but that will likely change in 2025 as we have several systems that should be ready for new media."			
10. Solid waste production and disposal: Exhausted carbon is sent to Calgon and anion resin is sent to Clean Harbors.			
11. Description of sample location and methods: The Authority collects samples from the sample port outside after mixing in the pump room and prior to discharge to the Authority. A composite sampler is brought by the lab, Envirocorp, and time-proportional samples are taken.			
Notes:			
Mr. Shannahan provided the Spill Control Plan and ASAP pumping invoices as requested. A diagram of wastewater flow at the plant was not provided as requested at the time of finalizing this report.			

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Plymouth Tube Company					
Address of industry: 2000 Industrial Parkway Salisbury, MD 21801					
Date of visit: 12/3/2024			Time of visit: 9:30 AM – 10:43 AM		
Name of inspectors: Melanie Gravenor and Connie Luffman with the City of Salisbury WWTP Erin DeSandro, Samuel Magro, and Amrita Gupta, EPA Region 3					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Jenna Griffith		Corporate Environmental Safety Director			
Jason Dize		Safety Manager			
IU Permit Number: 20-1020		Exp. Date: 12/12/2025		IU Classification: CIU Part 433 – Metal Finishing	
Please provide the following documentation:					
1. Nature of operation: The facility extrudes, cuts, cleans, straightens, and ships stainless steel tubing custom to specific products and industries such as medical, space, and nuclear. The customers send product designs with sizes ranging from 3 millimeter to 1 inch thickness and lengths up to 130 feet.					
2. Number of employees:		72	Number of shifts:		2
				Hours of operation:	7AM-11PM
3. Wastestream flow(s) discharged to the POTW: Wastewater is primarily from acid rinsing and cleaning steel after drawing.					
Sanitary:	300 (gpd)	Process:	11,093 (gpd)		
4. Describe any significant changes in process or flow: None					
5. Type of pretreatment system (Describe): None.					
Continuous flow		Batch		x	Combined
6. Process area description (identify raw materials and processes used) Raw stainless steel material is drawn to a specific diameter by one of two processes. (1) Tubing is drawn through pulling the raw material from die to die to a specific length. (2) Tubing is plugged and pulled through until it reaches a specific length. After being drawn, cut, and annealed, the material is passivated for cleaning using Nitric/Hydrofluoric Acid mixture. The material is dipped in tanks using an overhead crane. After passivation, the material is rinsed. Rinse water discharges to Outfall 002.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): Nitric phosphate acid is used to passivate tanks in between batches. Other chemicals used for cleaning are stored on shelves in the storage room.			
Any floor drains?	No.	Any spill control measures?	Yes, spill kits and secondary containment are present.
8. Are hazardous wastes drummed and labeled? Yes.			
9. Does the IU have hazardous waste manifests? The most recent waste manifest was provided for Nitric Acid removal by Safety-Kleen Systems Inc. on 11/13/2024.			
10. Solid waste production and disposal: Small quantity generator. Drummed waste is removed within 30-60 days.			
11. Description of sample location and methods: Process wastewater from the facility goes to Outfall 002. A composite sampler is set up by the lab, Envirocorp, time-composite samples are taken.			
Notes:			
None.			

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Evolution Craft Brewing					
Address of industry: 200 Elmwood Street Salisbury, MD 21804					
Date of visit: 12/4/2024			Time of visit: 11:00 AM – 12:20 PM		
Name of inspectors: Melanie Gravenor and Connie Luffman with the City of Salisbury WWTP Erin DeSandro, Samuel Magro, and Amrita Gupta, EPA Region 3					
Provide the name(s) and title(s) of industry representative(s)					
Name			Title		
John Scheckells			Brewery Manager		
IU Permit Number: 23-4831		Exp. Date: 5/31/2028		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility brews approximately 13,000 barrels of beer (est. 403,000 Gallons in 2024) and a small number of seltzers (less than 1,000 barrels). The brewery is attached to the associated restaurant.					
2. Number of employees:		7	Number of shifts:		1
				Hours of operation:	6 AM-4 PM
3. Wastestream flow(s) discharged to the POTW: Wastewater is primarily from rinsing and cleaning tanks, fermenters, floors, and other areas where brewing occurs.					
Sanitary:		250 (gpd)	Process:		2,700 (gpd)
4. Describe any significant changes in process or flow: None.					
5. Type of pretreatment system (Describe): The facility has pH adjustment using soda ash. Soda ash is added in Solids Tanks 1 and 2 and held before being sent to Tank 3 prior to discharge to the Authority.					
		Continuous flow		Batch	
				x	Combined X
6. Process area description (identify raw materials and processes used) Process areas include cone bottom fermenters, a mill for crushing, kettles, and a bottling area.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): Chemicals used for cleaning are stored in the back corner of the cellar.			
Any floor drains?	Yes	Any spill control measures?	Some secondary containment.
8. Are hazardous wastes drummed and labeled? No hazardous waste.			
9. Does the IU have hazardous waste manifests? No.			
10. Solid waste production and disposal: Malted barley, spent barley, extracted sugar, unused yeast, and hop flowers are hauled and used as cattle feed.			
11. Description of sample location and methods: The Authority conducts all sampling at the facility. A composite sampler takes time-composite sample. The pH is monitored continuously.			
Notes:			
<p><u>Observation 9 Evolution Brewing Co IU Visit: The industry did not maintain best management practices to prevent slug discharges to the city.</u></p> <p>At the time of inspection, several chemicals were not on secondary containment (Photograph 79 and 82). There was also a bucket of waste beer overflowing into the nearby drain by the keg filling station (Photograph 76 and 84).</p> <p>After the site visit, EPA inspectors requested the following via email:</p> <ul style="list-style-type: none"> • The name and address of the current farmer that is taking solid waste from the brewery operations. • Copies of all pump out receipts for the for the underground retention tanks dated 2022 to present. • Any type of spill prevention control plan for the facility. <p>These documents were not provided at the time of finalizing this report.</p>			