



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 02/27/2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Compliance Evaluation and Inspection
Site/Facility Name: Clarks Summit State Hospital
Permittee(s): Commonwealth of Pennsylvania Department of Public Welfare
Site/Facility Operator: Paul Pasek
Site/Facility Address: 1451 Hillside Drive
Clarks Summit, PA 18411
Latitude: 41.485608 **Longitude:** -75.748214
County/Parish: Lackawanna County
Permit Number: PA0029432
NAICS Code: 622210 **SIC:** 8063
Unique Project #: ECAD-5398

Site/Facility Representative(s):	Point of Contact
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I. Introduction

On February 27, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a Compliance Evaluation Inspection of the Clarks Summit State Hospital facility (hereinafter, “the facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PA0029432 (hereinafter, the “Permit”) and applicable State and Federal regulations.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at 12:45 PM 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 Inspector	(215) 814-2125	DeSandro.Erin@epa.gov
James Kline	EPA Region 3 Inspector	(304) 234-0263	Kline.James@epa.gov
Site/Facility Representatives			
Paul Pasek,	Facility Operations Manager	(570) 587-7246	ppasek@pa.gov
Ryan Wilbur	Licensed Operator	(570) 851-9533	rwilbur@pa.gov
Carl Rundquist	PA Department of Human Services, Civil Engineer Consultant	(717) 772-2088	crundquist@pa.gov
Joseph Guzek	Guzek Associates, Inc., Engineer Consultant	(570) 650-9528	guzekassoc@aol.com

EPA Inspectors Erin DeSandro and James Kline displayed their credentials to Mr. Pasek 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 as Attachment 2. The EPA Inspection Team informed Mr. Pasek that any information that the Facility 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.

B. Weather and Precipitation Conditions

During the inspection, weather was cloudy with no precipitation. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/22/2024	Trace
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/23/2024	0.3
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/24/2024	0
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/25/2024	0
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/26/2024	0
CLARKS GREEN 0.5 N, PA US US1PALC0028	02/27/2024	0

C. Summary of the Site/Facility

The facility is owned and operated by Pennsylvania's Department of Public Welfare. There are approximately 150 full-time residents and 300 staff personnel at the state hospital. The wastewater treatment plant (hereinafter, the "WWTP") was built in 1954 and has a design flow of 395,000 GPD. An elementary school and middle school also feed into the WWTP. Facility representatives estimate that the hospital contributes 40,000 – 50,000 GPD, while the schools contribute 6,000 – 10,000 GPD during the school year. Mr. Rundquist explained that the facility has an existing 537 agreement with Newton Township that allows Newton township to contribute up to 300,000 GPD to the WWTP in emergency situations.

The permit for the facility expired February 28, 2014. Mr. Pasek said the application to renew the permit was submitted, the existing permit is administratively extended, and the new permit has not been issued. According to Mr. Pasek, the facility and PADEP met to discuss options to build a new WWTP or eliminate the WWTP by connecting to Abington Regional Wastewater Authority ("ARWA"). After approximately 2 years of meeting with ARWA, in summer of 2023, the facility's request to connect was reportedly denied. Since that time, the facility has moved forward with 2 inflow and infiltration surveys, the second of which is estimated to conclude in May 2024. According to Mr. Rundquist, following the survey completion, the facility will begin upgrading its connections within the system and at the contributing schools to reduce inflow and infiltration and begin designing and building a new WWTP as part of its capital improvement project.

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

II. Site Activity

During the inspection, the EPA Inspection Team observed the WWTP. The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment 1.

The current treatment train consists of a Muffin Monster grinder pump (installed in 2014), bar screen, a second grinder pump, splitter box where recirculating flow from Recirculating Pumps #3 and #4 mixes, 2 primary clarifiers, 2 trickling filters with recirculating sludge flow at Trickling Filter #1 from Recirculating Pumps #1 and #2, Final Clarifier, chlorine contact tank, sodium bisulfite injection, composite sampler, two sludge pumps, anaerobic digester used as a sludge holding tank, and aeration tank for water that decants from sludge the holding tank. The pumps and chlorine storage room are in the WWTP building. Effluent discharges from Outfall 001 to Falls Creek.

III. Observations

Observation 1:

Part A.1-A.3 of the permit defines effluent limitations and monitoring requirements for Outfall 001 discharges.

According to EPA's ECHO database, the Plant experienced 46 effluent limit exceedances from Outfall 001 between February 27, 2020, and February 27, 2024 (refer to Table 2 below). The highest percentage of exceedances occurred for Nitrogen, total ammonia, followed by BOD5, fecal coliform, and dissolved oxygen. EPA's ECHO database indicates the Plant was in a state of significant noncompliance (SNC) from April 1, 2021, through October 1, 2023 (refer to Appendix B, Exhibit 2).

Table 1: DMR Effluent Limit Exceedances 02/27/2020-02/27-2024

Monitoring Period Date	Parameter Description	DMR Value	Limit Value	Unit	Statistical Base
06/30/2020	Nitrogen, ammonia total	.561	.5	mg/L	MO AVG
01/31/2021	Nitrogen, ammonia total	1.97	1.5	mg/L	MO AVG
02/28/2021	Nitrogen, ammonia total	13.21	1.5	mg/L	MO AVG
03/31/2021	Nitrogen, ammonia total	3.074	1.5	mg/L	MO AVG
04/30/2021	Nitrogen, ammonia total	3.32	1.5	mg/L	MO AVG
05/31/2021	Nitrogen, ammonia total	.799	.5	mg/L	MO AVG
08/31/2021	Nitrogen, ammonia total	1.29	.5	mg/L	MO AVG
09/30/2021	Nitrogen, ammonia total	1.896	.5	mg/L	MO AVG

Monitoring Period Date	Parameter Description	DMR Value	Limit Value	Unit	Statistical Base
10/31/2021	Nitrogen, ammonia total	1.862	.5	mg/L	MO AVG
11/30/2021	Nitrogen, ammonia total	1.82	1.5	mg/L	MO AVG
12/31/2021	Nitrogen, ammonia total	3.6	1.5	mg/L	MO AVG
01/31/2022	Nitrogen, ammonia total	12.56	1.5	mg/L	MO AVG
01/31/2022	Nitrogen, ammonia total	6.554	4.9	lb/d	MO AVG
01/31/2022	BOD, carbonaceous [5 day, 20 C]	29.08	25.	mg/L	MO AVG
02/28/2022	Nitrogen, ammonia total	4.04	1.5	mg/L	MO AVG
03/31/2022	Nitrogen, ammonia total	2.148	1.5	mg/L	MO AVG
03/31/2022	BOD, carbonaceous [5 day, 20 C]	33.78	25.	mg/L	MO AVG
03/31/2022	BOD, carbonaceous [5 day, 20 C]	71.05	40.	mg/L	DAILY MX
05/31/2022	Nitrogen, ammonia total	.9454	.5	mg/L	MO AVG
06/30/2022	Nitrogen, ammonia total	1.	.5	mg/L	MO AVG
07/31/2022	Nitrogen, ammonia total	1.229	.5	mg/L	MO AVG
08/31/2022	Nitrogen, ammonia total	.94	.5	mg/L	MO AVG
09/30/2022	Nitrogen, ammonia total	1.578	.5	mg/L	MO AVG
10/31/2022	Nitrogen, ammonia total	3.041	.5	mg/L	MO AVG
12/31/2022	Nitrogen, ammonia total	3.55	1.5	mg/L	MO AVG
01/31/2023	Nitrogen, ammonia total	4.143	1.5	mg/L	MO AVG
02/28/2023	Nitrogen, ammonia total	7.61	1.5	mg/L	MO AVG
03/31/2023	Nitrogen, ammonia total	3.88	1.5	mg/L	MO AVG
04/30/2023	Nitrogen, ammonia total	6.87	1.5	mg/L	MO AVG
04/30/2023	BOD, carbonaceous [5 day, 20 C]	39.7	25.	mg/L	MO AVG
04/30/2023	BOD, carbonaceous [5 day, 20 C]	105.	40.	mg/L	DAILY MX
05/31/2023	Nitrogen, ammonia total	9.43	.5	mg/L	MO AVG
05/31/2023	Nitrogen, ammonia total	3.	1.6	lb/d	MO AVG
06/30/2023	Nitrogen, ammonia total	9.2	.5	mg/L	MO AVG
06/30/2023	Nitrogen, ammonia total	3.	1.6	lb/d	MO AVG
07/31/2023	Nitrogen, ammonia total	2.515	.5	mg/L	MO AVG

Monitoring Period Date	Parameter Description	DMR Value	Limit Value	Unit	Statistical Base
08/31/2023	Oxygen, dissolved [DO]	5.7	6.	mg/L	INST MIN
08/31/2023	Nitrogen, ammonia total	.998	.5	mg/L	MO AVG
09/30/2023	Nitrogen, ammonia total	1.59	.5	mg/L	MO AVG
09/30/2023	Coliform, fecal general	390.	200.	#/100mL	MO GEOMN
10/31/2023	Nitrogen, ammonia total	2.04	.5	mg/L	MO AVG
11/30/2023	Nitrogen, ammonia total	2.42	1.5	mg/L	MO AVG
12/31/2023	Nitrogen, ammonia total	1.56	1.5	mg/L	MO AVG

Observation 2:

Part B.I.D.2 of the permit states, “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance include, but is not limited to, adequate laboratory controls including appropriate quality assurance procedures...”

During the site inspection, the EPA Inspection Team observed several components of the treatment train that were not operating properly.

- Primary Clarifier #1 (Photograph 8) was taken offline on February 26th. The gear box (Photographs 9 and 10) was removed from Primary Clarifier #1 to be installed into the Final Clarifier due to the Final Clarifier’s gear box (Photograph 32) which was not functioning. All flow was going to Primary Clarifier #2.
- Primary Clarifier #2 has multiple holes in the ground around the perimeter of clarifier (Photograph 15). Mr. Wilbur reported these holes are from wildlife and it was unclear to the EPA Inspection Team if the clarifier was being impacted from this. Parts of the weir in Primary Clarifier #2 were broken off (Photographs 11 and 14). There was debris resembling plastic trash in the clarifier that was not removed from preliminary treatment (Photograph 13).
- Trickling Filter #1 (Photographs 19-23) was not operational at the time of inspection. The arm of Trickling Filter #1 was not moving. Mr. Rundquist stated that the bearings have not been functioning properly to allow the arm to rotate since October 2023.
- According to Mr. Wilbur, Recirculation Pump #1 (Photograph 50) has been offline for approximately a year. Sludge Pump #2 (Photograph 48) was also leaking at the time of inspection.

- The Final Clarifier weir had sections of concrete spalling (Photographs 34 and 35). There was biological growth and debris prior to the clarifier discharge point (Photographs 34 and 36).
- The composite sampler (Photographs 41-43) located next to the Chlorine Contact Tank was not in operation at the time of inspection. Mr. Wilbur stated that this sampler has not been in use for at least 5 years and that samples are manually taken and composited.

Observation 3:

Part C.I Special Condition One of the permit states, “No storm water from pavements, area ways, roofs, foundation drains, or other sources shall be directly admitted to the sanitary sewers associated with the herein approved discharge.”

During the site inspection, Mr. Wilbur and Mr. Pasek indicated that there was recently a storm event where there was sheet flow of stormwater directly entering the clarifiers and trickling filters. The treatment plant is downhill from the hospital and directly below Newton Ransom Boulevard and Winola Road.

IV. Records Review

During the inspection, the EPA Inspection Team reviewed documentation including: pH meter calibrations, lab bench sheets, O&M manual, the permit, and the last PADEP inspection dated 09/01/2022. A copy of the Permit is provided under Attachment 2. The EPA Inspection Team requested the following documents be sent after the inspection:

- A copy of the treatment plant SOP
- Any Notices of Violation issued by DEP since 2019
- Correspondence with PADEP confirming they received your permit renewal application and that your current permit is administratively extended
- Correspondence with PADEP/Abington Regional Wastewater Authority detailing the period of time/efforts to tie into ARWA’s system
- Any information regarding Newton Township’s 537 agreement with your facility
- I&I survey (the first and what’s been done so far in the second)
- Capital Improvement approvals, proposed design plans (as they become determined and available if not available yet).

The documents requested were sent by Mr.Pasek but were unable to be reviewed by the time of report finalization. The requested documents will be reviewed and attached as an addendum to the report.

V. Closing Conference

After the facility walk, the EPA Inspection Team met with the facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and 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 inspection concluded at 4:00 PM.

VI. List of Attachments

- Attachment 1: Inspection Photograph Log
- Attachment 2: Clarks Summit Permit: Expired 2014
- Attachment 3: Clarks Summit State Hospital PADEP Inspection 9/2022