



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): August 27-28, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Authority Name: Pennridge Wastewater Treatment Authority
Permittee(s): Pennridge WWTP

Site/Authority Operator: Pennridge WWTP

Authority Address: 180 Maple Avenue Sellersville, PA 18960
Lat/Long: 40.211500/-75.184800
County/Parish: Bucks
Permit Number: PA0020460

Authority Representative:

Kevin Franks, PWTA Manager
Email: franks@pwta75.org
Jeffery Morgan, Pretreatment Coordinator
Email: jjmscengrs@aol.com

Point of Contact



Inspector:

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

(List of additional attendees in Table 1)

**Report Preparer
Signature/Date**

ERIN DESANDRO

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Erin DeSandro, NPDES 2 (3ED33)

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Signature/Date**

JESSICA
DUFFY

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Date

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

Attachment C NPDES Permit – PA0020460

I. Introduction

On August 27-28, 2024, EPA contractor Chuck Durham and United States Environmental Protection Agency (EPA) Region 3 representatives Erin DeSandro, Angela Weisel, and Amrita Gupta (jointly referred to as the “Inspection Team”) conducted an on-site Pretreatment Compliance Inspection (PCI) of the Pennridge Wastewater Treatment Authority (hereinafter, the “Authority”) Pretreatment Program (hereinafter, “PCI” or “inspection”). The purpose of the inspection was to observe the Authority’s Pretreatment Program’s compliance with the Clean Water Act (CWA), the applicable Federal Pretreatment Regulations, and Authority’s National Pollutant Discharge Elimination System (NPDES) permit ID: PA0020460 (hereinafter, “Permit”) **(See Attachment C)**. Prior to the PCI, the Pennsylvania Department of Environmental Protection (PADEP) was notified of the inspection. The PADEP did not send a representative to attend the PCI. The EPA Inspection Team did provide the Authority with advanced notice of the PCI. As part of the PCI, the EPA Inspection Team reviewed the files and conducted a site visit of the following nondomestic dischargers: North Penn Polishing and Plating (“North Penn”), and Free Will Brewing Company (“Free Will”).

II. Opening Conference

Upon arrival at the Authority’s wastewater treatment plant (“WWTP”), the Inspection Team, met with the Authority representatives Mr. Morgan and Mr. Franks (hereinafter, “Authority representatives”). See Table 1 below for a full list of attendees. The Inspection Team presented their credentials, discussed the purpose and format of the pretreatment compliance inspection (“PCI” or “Inspection”) and interviewed the Authority representatives about the Authority’s pretreatment program.

Table 1: Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Erin DeSandro	Environmental Protection Agency	215-814-2125	desandro.erin@epa.gov
Angela Weisel	Environmental Protection Agency	215-814-2124	weisel.angela@epa.gov
Amrita Gupta	Environmental Protection Agency	215-814-3298	gupta.amrita@epa.gov
Chuck Durham	EPA Contractor, Eastern Research Group	615-888-2928	Chuck.Durham@erg.com
Site/Authority Representatives			
Jeffrey Morgan	SC Engineers, Industrial Pretreatment Program Coordinator	610-706-0706	jimsengs@aol.com
Kevin Franks	Pennridge Wastewater Treatment Authority, Manager	267-446-2728	franks@pwta75.org
Steve Argento	Pennridge Wastewater Treatment Authority	N/A	N/A

State or County Representatives			
N/A	No state representatives in attendance		

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

- North Penn Polishing & Plating (categorical industrial user (“CIU”) subject to *Title 40 of the Code of Federal Regulations* [40 CFR] Part 413 Electroplating and Part 433 Metal Finishing)
- Free Will Brewing Co. (non-categorical significant industrial user [“SIU”])

A formal Exit Conference was held on August 28, 2024 with Mr. Morgan and Mr. Franks.

The last EPA review of the Authority’s pretreatment program occurred on August 17-18, 2017.

II. Program Description
The Pennridge WWTP has a design capacity of 5.41 million gallons per day (MGD). The system connecting to the WWTP has 15,681 connections (approximately 100 connections are industrial, 100 are institutional, and 325 are commercial), with a total reported average discharge of 3.2 MGD. The areas served include the municipalities of Sellersville, Perkasio, East Rockhill, Telford, Silverdale, and Hilltown.

III. Industrial User (IU) Characterization		
IUs currently identified by the Control Authority (CA)	IU Type	
4	Discharging Significant Industrial Users	
	2	Discharging Non-Categorical SIUs (as defined by the CA)
	2	Categorical Industrial Users (CIUs)
	0	Middle Tier CIUs
0	Zero-Discharging CIUs	
	Non-significant CIU (NSCIU)	
19	Other Regulated IUs (e.g., permitted IUs) Describe: Not applicable (N/A)	
1	Waste Haulers Describe: Accepts hauled septage, residential and commercial wastes.	

IV. Observations Summary Table	
Observation (1) C.4.c	– The permits reviewed did not specify that the records retention period may be extended at the request of the State or EPA.
Observation (2) C.4.h	– Permits reviewed were missing the requirement to notify the Authority of bypasses.
Observation (3) C.4.i	– Permits reviewed were missing the requirement to develop and maintain a slug discharge control plan.
Observation (4) C.4.j	– Permits reviewed were missing the requirement to notify the Authority within 24 hours of becoming aware of a violation.

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 EPA of program modifications? (40 CFR 403.18)

The Authority last evaluated its local limits in 2020. A letter was sent to U.S. EPA Region 3 Water Division noting the revised local limits.

On February 28, 2024 the Authority received approval of the revised limits from U.S. EPA Region 3 Water Division. A resolution with the revised limits has been adopted in Sellersville and was in the process of being adopted by the other municipalities at the time of inspection.

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 provides service to the municipalities of Sellersville, Perkasio, East Rockhill, Telford, Silverdale, and Hilltown. The POTW does have agreements in place with each contributing jurisdiction addressing pretreatment program responsibilities.

B. IU Characterization

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

According to the Authority representatives, new industrial users contributing more than 400 GPD are required to complete a new or changed building use form to their respective municipalities. The Authority relies on the local townships 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. Permitted non-significant users are sent a yearly questionnaire and the Authority will conduct an additional site visit if there are reported changes.

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 EPA Region 3 Water Division.

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

The IU discharge permits reviewed address record retention being extended beyond 5 years until enforcement activities from the Authority are concluded but is missing the language from 40 CFR 403.12(o)(3) that includes "...or when requested by the Director or the Regional Administrator."

Regulatory Requirement

Record keeping requirements at 40 CFR 403.12(o)(2) require any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with

Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). *This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator.*

Observation (2) C.4.h – Permits reviewed were missing the requirement to notify the Authority 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 City of any potential bypasses.

Observation (3) C.4.i – Permits reviewed were missing the requirement to develop and maintain a slug discharge control plan.

The permits reviewed have template language that state the requirements of a slug discharge control plan if the Authority determines one is required. However, the permits do not specify that specific IUs were required to develop a plan. The fact sheets list if the IUs have a plan and if so, when it was last updated, but it does not state whether the plan is required by the Authority for each individual IU in the permit.

Regulatory Requirement

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

Observation (4) C.4.j – Permits reviewed were missing the requirement to notify the Authority within 24 hours of becoming aware of a violation.

Regulatory Requirement

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” (emphasis added).

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))

Yes. The Authority representatives stated that all CIUs are required to have a slug discharge control plan (SDCPs). Each of the SIUs permit Fact Sheets list that a SDCP is required.

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 Authority uses proper sampling, analysis, and inspection procedures. The permit facts sheets list sampling point location and contain justification for time proportional sampling in the files reviewed.

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 in Observation C.4.h, the Authority has been requiring, receiving, and analyzing required reports.

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

The WWTP performs all monitoring in lieu of requiring self-monitoring. Based on the files reviewed, SIUs have been re-sampled after violations.

7. Has the CA ensured CIUs report on all regulated pollutants at least once every 6 months? (40 CFR 403.12(e)(1) & (g)(1))

Yes. Based on the CIU file reviewed during the inspection, 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))

The WWTP performs all monitoring in lieu of requiring self-monitoring. IU permits state that the IUs pay the Control Authority directly for all sampling.

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 is performing all monitoring in lieu of IUs submitting SMRs. IU permits state that additional reporting 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, based on the files reviewed by the Inspection Team and responses from the Authority Representative, the Authority has been implementing its ERP.
2. Does the CA evaluate both numeric and narrative criteria for significant non-compliance (SNC) and annually publish a list of IUs in SNC? (40 CFR 403.8(f)(2)(viii)) Yes, the Authority evaluates SNC according to the definition in its SUO. The Authority publishes a list of SIUs in SNC in <i>The Intelligencer</i>. 2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status. No. The last facility in SNC was Free Will Brewing Co in 2020.
3. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A)) The Authority representatives said there are no SIUs under a compliance schedule.
4. Has the CA ensured CIU compliance within 3 years of standards effective date (or less than 3 years where required by standard)? (40 CFR 403.6(b)) N/A. The Authority 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)) 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.
G. Additional Evaluations
1. Hauled Waste The Authority accepts hauled septage, commercial wastes, and residential wastes. The Authority licenses all waste haulers who discharge at the trucked waste receiving station. Each load is sampled for pH and the haulers provide a manifest to the Authority.
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 does not have a FOG program. Authority representatives stated they were not aware of any issues in the collection system due to grease. The Authority conducts cleanouts of Grand View Hospital grease trap.

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: North Penn Polishing & Plating (NPPP)					
Address of industry: 40 West Park Avenue, PA 18960					
Date of visit: 8/27/2024			Time of visit: 1:30 pm – 3:00 pm		
Name of inspectors: Jeff Morgan and Steve Argento with the Pennridge Wastewater Treatment Authority Erin DeSandro, Angela Weisel, and Amrita Gupta, EPA Region 3 Chuck Durham, ERG					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Alex Imbody		President, North Penn Polishing and Plating			
Brian Stahley		Production/Receiving Manager			
IU Permit Number: 22-04		Exp. Date: 05/31/2025		IU Classification: CIU (413 and 433)	
Please provide the following documentation:					
1. Nature of operation: NPPP is a metal finishing and electroplating job shop with 7 active process lines.					
2. Number of employees:		23	Number of shifts:		2
			Hours of operation:		7:00 am – 2 am (M-F)
3. Wastestream flow(s) discharged to the POTW: Process wastewater is primarily generated from overflow from rinse tanks and during cleaning operations.					
Sanitary:		600 (gpd)	Process:		15,900 (gpd)
4. Describe any significant changes in process or flow: NPPP installed a black oxide line (Line #8) in 2022. This line has never been used but is capable of running.					
5. Type of pretreatment system (Describe): Process wastewater flows from floor drains in the process areas into the metal hydroxide precipitation and filtering system. This system consists of a general rinse, pH adjustment, clarifier, sand filter, two sludge holding tanks, and a filter press. Waste from the filter press is bagged and hauled off site.					
Continuous flow		X	Batch		Combined
6. Process area description (identify raw materials and processes used) NPPP is composed of 8 process lines: Black Oxide (1-2022; Ni, Cr, Cu and Zn), Electrolysis Nickel (1-appx. 2014-B80), Barrel (Zn, Tin, Ni and Phosphate), Zinc Barrel, Electro Deposited Paint, Zinc/Phosphate and Tin Rack.					

IU SITE VISIT DATA SHEET (Continued)

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): The chemical storage area for the process area is in a separate semi-enclosed containment area with no floor drains. Wastewater treatment chemicals include coagulants and pH adjustment chemicals.			
Any floor drains?	Yes, direct to treatment.	Any spill control measures?	Yes, spill kits and secondary containment pallets
8. Are hazardous wastes drummed and labeled? Yes.			
9. Does the IU have hazardous waste manifests? Yes.			
10. Solid waste production and disposal: Clean Earth hauls all hazardous waste.			
11. Description of sample location and methods: The Authority collects samples from the sample port at the effluent of the sand filter. Samples are time-proportional composite samples.			
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: Free Will Brewing Company					
Address of industry: 410 East Walnut Street Suite 10, Perkasie, PA 18944					
Date of visit: 8/28/2024			Time of visit: 9:00 am – 10:15 am		
Name of inspectors: Jeff Morgan and Steve Argento with the Pennridge Wastewater Treatment Authority Erin DeSandro, Angela Weisel, and Amrita Gupta, EPA Region 3 Chuck Durham, ERG					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Dominic Capece		CEO/General Manager			
IU Permit Number: FUJ2024		Exp. Date: June 30, 2024		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility produces approximately 155,000 gallons of malt beverages for Free Will Brewery and a private label annually. The facility also has a tap room and makes approximately 200 gallons of wine per season.					
2. Number of employees:	11	Number of shifts:	1	Hours of operation:	5AM-6PM M-F
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:	300 (gpd)	Process:	2,700 (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) Process areas include cone bottom fermenters, a hopper for combining barley, a mill for crushing, kettles, and a canning area.					

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?	Yes	Any spill control measures?	Yes, spill kits.
8. Are hazardous wastes drummed and labeled? No hazardous waste.			
9. Does the IU have hazardous waste manifests? N/A.			
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: Wastewater from the facility goes to a central pit. There are other tenants in the building that contribute small amounts of sanitary to the pit. Time-proportional composite sampling from the is required at the facility since their wastewater discharge quality is variable. The Control Authority states in the permit fact sheet that discharges to the sewer system from this pit are generally pumped at a consistent rate.			
Notes:			
None.			