



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): 8/9-10/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Facility Name: Hollidaysburg Regional Wastewater Treatment Plant
Permittee(s): Hollidaysburg Borough Sewer Authority Blair County
Site/Facility Operator: Hollidaysburg Borough Sewer Authority
Facility Address: 2681 Reservoir Road Hollidaysburg, PA. 16648
Lat/Long: 40.43002, -78.360268
County/Parish: Blair
Permit Number: PA0043273
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN062A

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Point of Contact



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I. Introduction

On August 9-10, 2023, Inspector Jim Kline (Inspector Kline) from the U.S. Environmental Protection Agency (EPA) Region III, National Pollutant Discharge Elimination System (NPDES) Section conducted an on-site Pretreatment Compliance Inspection (PCI) of the Hollidaysburg Regional Wastewater Treatment Plant (hereinafter HRWWTP) Pretreatment Program. HRWWTP is located at 2681 Reservoir Road in Hollidaysburg, PA 16648 (**See Attachment #1- Photo #1**). The purpose of the inspection was to observe the program's compliance with the Clean Water Act (CWA), the applicable Federal Pretreatment Regulations, and the Facility's National Pollutant Discharge Elimination System (NPDES) permit (ID: PA0043272) (**See Attachment #2**). Prior to the PCI, the Pennsylvania Department of the Environment ("PADEP") was notified of the inspection. The PADEP did not send a representative to attend the PCI. Inspector Kline did provide HRWWTP advanced notice of the PCI.

All information included in this report is the result of observations made by Inspector Kline, statements made by HRWWTP and/or Curry Rail representatives, materials shown to Inspector Kline by HRWWTP and/or Curry Rail representatives, and/or documents provided by HRWWTP and/or Curry Rail representatives to Inspector Kline at the time of, or subsequent to, the inspection.

A. HRWWTP- Opening Conference

Inspector Kline arrived at HRWWTP at 9:00AM on Wednesday August 9, 2023. Upon arrival, Inspector Kline presented his credentials to Mr. Frank B. Hicks, Jr., Director of Wastewater Operations. Mr. Hicks stated he is also the Pretreatment Coordinator and is actively trying to hire a new employee to fill the role of Pretreatment Coordinator. Inspector Kline proceeded to conduct an Opening Conference with Mr. Hicks.

Inspector Kline informed Mr. Hicks that any information that HRWWTP deemed to be confidential business information ("CBI") should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA's CBI procedures. Inspector Kline informed Mr. Hicks that photographs would be taken during the inspection (photographs are provided in **Attachment #1** of this report).

B. HRWWTP- Background Information

HRWWTP is a wastewater treatment plant, owned and operated by the Hollidaysburg Borough. According to the PADEP-issued NPDES Permit, HRWWTP has a hydraulic capacity of 6 million gallons per day and discharges to the Frankstown Branch of the Juniata River which eventually drains to the Chesapeake Bay. The NPDES permit was effective April 1, 2023, and expires March 31, 2028. Mr. Hicks stated that HRWWTP is manned seven days a week from 7:00AM until 3:00 PM. Outside staffed hours, remote monitoring is accomplished using a Sensaphone System.

The HRWWTP services Hollidaysburg Borough and has four jurisdictional agreements with Blair, Logan, Allegheny, and Frankstown Townships. As a representative sample, Inspector Kline requested and received a copy of the jurisdictional agreement between Hollidaysburg and Logan Township (**See Attachment #3**).

Inspector Kline asked when the last time HRWWTP evaluated their local limits for the Pretreatment Program. Mr. Hicks stated the local limits were last evaluated in 2018 and currently is reflected in each individual IU Permit. Inspector Kline asked Mr. Hicks if HRWWTP was current with all EPA annual reporting requirements. Mr. Hicks stated HRWWTP is current and has not been late with annual reporting. The most recent Annual Report that HRWWTP submitted was in 2022 (**See Attachment #4**).

Mr. Hicks stated HRWWTP does not accept hauled-in wastes. According to Mr. Hicks, all sludges generated at HRWWTP are transported by a contracted third-party and disposed in Sandy Run Landfill in Bedford, PA.

Inspector Kline asked Mr. Hicks if HRWWTP had a Fats Oil and Grease (FOG) Program. Mr. Hicks stated the Borough of Hollidaysburg requires certain establishments to install oil and grease separators to prevent FOG issues or problems. Mr. Hicks added that FOG has not been an issue for HRWWTP.

C. HRWWTP- Industrial Pretreatment Program File Review

Inspector Kline conducted an Industrial Pretreatment Program File Review at HRWWTP. According to Mr. Hicks, Mr. Ken Parks previously held the position of Pretreatment Coordinator from 2018 until 2021. Mr. Hicks is also the current Pretreatment Coordinator. During a telephone conversation with Mr. Hicks on October 12, 2023, Mr. Hicks stated a selection has been made for a new Pretreatment Coordinator. Mr. Hicks added that individual will be filling that role on October 30, 2023.

According to Mr. Hicks, HRWWTP has three permitted industrial users (IUs). The IUs are: Small Tube Products (STP), Anderson Electronics, and Curry Rail Services (CRS). Mr. Hicks provided Inspector Kline a contacts information list of the three IUs which is included in the 2022 Annual Report (**See Attachment #4**). According to Mr. Hicks, CRS is the newest IU. Inspector Kline asked Mr. Hicks how HRWWTP identifies potential industrial users. Mr. Hicks stated he was familiar with the activities within the boundaries of the service area. Mr. Hicks stated that reviews are conducted of water and sewer service applications and are used to determine if a location has the potential to require an IU Permit. Once a location has been identified as having the potential, an industrial discharge survey form would be sent to the location. Mr. Hicks provided a copy of the survey form that is mailed out to the location (**See Attachment #5**).

Inspector Kline asked Mr. Hicks if IU inspections and/or sampling are conducted. Mr. Hicks stated each IU is inspected and sampled annually. Mr. Hicks added that all three IUs were inspected and sampled in 2022. For 2023, Mr. Hicks stated CRS had not yet been inspected nor sampled. During the 2022 inspections that were conducted, sampling also occurred.

Inspector Kline requested and received the 2022 Inspection Report for CRS (**See Attachment #6**). Inspector Kline asked Mr. Hicks if the IUs also conduct independent sampling. Mr. Hicks stated all IUs are required to sample. According to Mr. Hicks, both STP and Anderson Electronics sample semi-annually and CRS samples monthly. Inspector Kline asked who conducts sampling on behalf of HRWWTP. Mr. Hicks stated HRWWTP collects the samples and Fairway Laboratories, a third-party contracted lab, conducts the analysis.

Inspector Kline asked Mr. Hicks if any of the three IUs had any permit parameter exceedances in the past three years. Mr. Hicks stated neither STP nor Anderson Electronics had any permit parameter exceedances. Mr. Hicks stated CRS did have permit parameter exceedance in 2022. Mr. Hicks stated CRS had the following exceedance:

-Sample event: April 4 & 5th, 2022- Cadmium: Permit limit (max. daily) is 0.03856 mg/l. The reported result was 0.975 mg/l.

Sampling was conducted on behalf of CRS by Fairway Laboratories. Inspector Kline asked Mr. Hicks if CRS notified HRWWTP about the cadmium exceedance. Mr. Hicks stated, on May 5, 2022, Ms. Creany sent an e-mail notifying him about the exceedance that occurred during the April 4 & 5, 2022 sampling event. Inspector Kline requested and received a copy of the e-mail (**See Attachment #7**). Inspector Kline asked if Ms. Curry or any CRS representative orally or in writing notified HRWWTP about the exceedance prior to the May 5, 2022, e-mail. Mr. Hicks stated HRWWTP did not receive any telephone calls or e-mails, and the May 5, 2022, e-mail was the first time he was made aware of the exceedance.

Inspector Kline asked if HRWWTP took an enforcement action for this permit violation. Mr. Hicks stated according to their Enforcement Response Guide, they sent CRS a Notice of Violation for the incident.

Inspector Kline requested and received a copy of the HRWWTP Enforcement Response Guide (**See Attachment #8**). Inspector Kline completed the Field Audit Checklist with input from Mr. Hicks (**See Attachment #9**). Inspector Kline requested and received a copy of the IU Permit issued to CRS (**See Attachment #10**).

Inspector Kline asked if CRS had developed a Slug Control Plan. Mr. Hicks stated CRS is required to have a Slug Control Plan. Inspector Kline requested and received a copy (**See Attachment #11**).

As part of the PCI, Inspector Kline selected CRS for the IU tour portion of the inspection. This concluded the PCI for the day.

II. IU Inspection- CRS

A. CRS- Opening Conference

Inspector Kline and Mr. Hicks met at the HRWWTP at 8:45AM on Thursday, August 10, 2023, and drove to Curry Rail Services (CRS) located at 585 Berwind Drive which is approximately 3 miles from HRWWTP. Inspector Kline and Mr. Hicks arrived at CRS at approximately 9:00 AM. Inspector Kline presented his credentials to Mr. Ken Flanders, Plant Manager and Ms. Alexandra Creany, Director of Environmental Health and Safety at the outset of the inspection. Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed both Mr. Flanders and Ms. Creany that any information that either individual deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. During the inspection, neither Mr. Flanders nor Ms. Creany identified CBI. Mr. Mark Ritchey, President of CRS, arrived after the Opening Conference had started and attended a portion of the conference. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the HRWWTP Pretreatment Program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. CRS- Background Information

Inspector Kline asked Mr. Flanders and Ms. Creany to provide a brief historical description of their facility and what CRS does there. According to Mr. Flanders, CRS is a rail and tank car repair facility. Mr. Flanders added they do tank car cleaning, welding, interior and exterior coating and painting, inspections, rebuilds and wreck repair. CRS is situated on an approximately forty-acre site. Mr. Flanders added CRS does have six routine customer commitments.

According to Ms. Creany, CRS is a large quantity generator of hazardous wastes. Ms. Creany stated before any rail or tank car arrives at CRS, a determination has already been made if it can be accepted at CRS. Ms. Creany stated CRS does do pH testing and routine toxicity characteristic leaching procedure (TCLP) testing on the waste materials that might arrive in the rail or tank cars. Ms. Creany added that in March 2023, testing was conducted on the waste residual solids cake from the wastewater process filter. Ms. Creany stated the filtered solids cake has always tested non-hazardous and is disposed as residual waste. Inspector Kline asked Ms. Creany to describe some of the waste that comes into CRS in the rail or tank cars. Ms. Creany stated some of the waste is hazardous material due to high volatile organic compounds (VOCs) or is a caustic material. Ms. Creany stated CRS does not receive hazardous heavy metals or hazardous dusts in either a rail or tank car. Ms. Creany stated the wastewater generated mostly comes from the steam cleaning of the rail cars and tank cars.

Ms. Creany added CRS has both air and stormwater permits. Mr. Flanders added they are also regulated by the Federal Railroad Administration (FRA). Mr. Flanders stated CRS purchased the current location in July 2020. Ms. Creany stated she believed the first permitted industrial wastewater discharge to HRWWTP began in November 2021.

Inspector Kline asked Mr. Flanders how many employees are at the CRS location. Mr. Flanders stated there are eighty-seven full-time employees. According to Mr. Flanders, Curry Supply Holdings (CRS parent company) has approximately 473 employees. Inspector Kline asked what CRS operating hours are. Mr. Flanders stated there are various crews with differing shifts, but overall hours of operation are 6:00AM until 10:30 PM. Mr. Flanders added cars do not enter the facility after day shift.

Inspector Kline requested and received a wastewater pretreatment process flow diagram (**See Attachment #12**). According to Ms. Creany, the diagram provided is not accurate in that there is no Alum tank. Inspector Kline asked when the Alum tank was removed. Ms. Creany stated that tank has not existed since day one. Inspector Kline asked Ms. Creany if the remaining diagram was correct. Ms. Creany stated there is an activated charcoal unit in use that should be on the diagram.

The wastewater pretreatment process consists of nine units:

1. Processing Tank
2. Flocculant
3. Filtration
4. Solids removal
5. Drum dryer
6. Solids storage/roll-off
7. Oil/water separator

8. Activated charcoal treatment

9. Wastewater Holding Tank.

Following the wastewater holding tank, flow data is collected. Ms. Creany stated effluent sampling is collected from an area called the “Blue Box.”

Inspector Kline asked Ms. Creany if CRS had any permit parameter exceedances since November 2021. Ms. Creany stated they did have a cadmium exceedance during the April 2022, monthly sampling event. Inspector Kline requested and received an analytical report generated by Fairway Laboratories; CRS’s contracted third-party lab dated April 18th (**See Attachment #13**). Ms. Creany stated that she would have received the report on April 18, 2022. According to the report, the sampling date for cadmium was April 5, 2022. The reported cadmium value was 0.975 mg/l. Inspector Kline asked Ms. Creany what the maximum daily concentration for cadmium was. Ms. Creany stated that limit is 0.03856 mg/l. Inspector Kline asked Ms. Creany if she or any other CRS representative notified HRWWTP within twenty-four hours of discovering the permit violation. Ms. Creany stated she believed she would have called Mr. Hicks at the HRWWTP. Inspector Kline asked Ms. Creany if she kept a phone log or had any record of this phone call notification. Ms. Creany stated she would have to go back and look. As of the date in preparing this inspection report, Inspector Kline has not received any further information regarding any phone call notification from Ms. Creany or any CRS representative. Inspector Kline asked Ms. Creany when the first e-mail or letter was sent to HRWWTP concerning the cadmium exceedance. Ms. Creany stated she sent an e-mail to Mr. Hicks on May 5, 2022, providing him notice about the permit violation (**See Attachment #7**). Inspector Kline also observed in this same report, the reported zinc limit to be 2.90 mg/l. The maximum daily concentration limit is 5.74448 mg/l and the average monthly concentration limit is 2.87224 mg/l. Inspector Kline asked Ms. Creany if a resampling event had occurred as a result of the exceedances. Ms. Creany stated no because they sample monthly. Ms. Creany added the next monthly sampling was scheduled to occur on 5/6/2022.

C. CRS- Observations

Inspector Kline requested and received a layout-map of the facility (**See Attachment #14**). Inspector Kline requested to tour CRS. The tour started at Building #1-Waste Water Treatment and Cleaning. Ms. Creany introduced Inspector Kline to Mr. Rich Heverly, Cleaning Supervisor.

Observation #1: Inspector Kline asked where the activated charcoal unit was located. Mr. Heverly showed both Inspector Kline and Mr. Hicks the activated charcoal unit (**See Attachment #1- Photo #2**). Inspector Kline observed the rolled filter and solids container (**See Attachment #1- Photo #3**). According to Ms. Creany, the filter paper is not reused and is disposed with the solids as residual wastes.

Observation #2: Inspector Kline and Mr. Hicks went into the office of Building #1. Attached to the wall was an ultrasonic flowmeter, which appeared to be in operation and had a digital display indicating the current flow (**See Attachment #1- Photo #4**). Inspector Kline asked how frequently the flowmeter was calibrated. Mr. Heverly stated that The Meter Guy comes in every 6 months and calibrates the flowmeter. Inspector Kline observed a calibration sticker on the top of the flowmeter which indicated the flowmeter was calibrated by The Meter Guy, LLC in June 2023, and expired December 2023 (**See Attachment #1- Photo #5**).

Observation #3: Inspector Kline and Mr. Hicks were enroute to observe the sump located adjacent to Building #1. Inspector Kline observed three black 55-gallon drums placed on a wooden pallet (**See Attachment #1- Photo #6**). The drums and pallet were placed directly on an open-metal grate, which is over a trench to the sump (**See Attachment #1- Photo #7**). Inspector Kline asked what was in the three drums. Mr. Heverly stated the drums contained caustic soda beads. Inspector Kline observed a label on the side of a drum which indicated the contents were caustic soda beads (**See Attachment #1- Photo #8**). Inspector Kline observed that all three drums appeared to be properly closed and appeared in good condition with no obvious damage or leaks. Inspector Kline asked Mr. Heverly if the drums were placed in the best possible location or should be on containment pallets due to their corrosivity. Mr. Heverly stated he thought the drums were in a good location because if they were to leak or get knocked over it would occur over the trench leading to the sump.

Observation #4: Inspector Kline and Mr. Hicks observed the chain-linked fence and gated entrance to the sump (**See Attachment #1- Photo #9**) and the sump (**See Attachment #1- Photo #10**). The gate had a, “Do Not Enter” sign posted. Inspector Kline did not observe any other emergency contact information posted in this area. Inspector Kline observed multiple cracks in the concrete walls of the sump, namely two exterior and interior corners (**See Attachment #1- Photos #11 through #14**). Inspector Kline observed interior portions of the sump walls with cracks (**See Attachment #1- Photo #15**). Inspector Kline observed portions of the interior walls had previously been repaired but those repairs appeared to be aging or in need of additional repair and integrity testing (**See Attachment #1- Photos #16 & #17**). Inspector Kline could not ascertain visually if the sump was or was not leaking. Ms. Creany stated the sump was recently lined. Ms. Creany stated they had spent over \$90,000 repairing the sump. Inspector Kline requested that Ms. Creany please share completed work repairs, structural testing results or photos related to the sump repair. On August 29, 2023, Inspector Kline received an e-mail from Ms. Creany stating that additional repairs were made to the sump following this inspection. The e-mails contained the following four photos (**See Attachment #1- Photos #18 through #21**). In a separate e-mail to Inspector Kline dated August 29, 2023, Ms. Creany sent invoice proposals dated May 2021, for trough repairs marked “CONFIDENTIAL and PROPRIETARY.” It appeared from the information sent that repairs were made to only the trough and not the sump. As of the date in preparing this inspection report, no additional documentation was received by Inspector Kline concerning repairs to the sump.

Observation #5: Inspector Kline and Mr. Hicks observed the “Blue Box” (**See Attachment #1- Photo #22**). According to Mr. Heverly, this is where all effluent samples are collected. Mr. Hicks verified the location. Inspector Kline asked Mr. Heverly to open the lid to the Blue Box. Inspector Kline observed the sample location inside the box (**See Attachment #1- Photo #23**).

Observation #6: Inspector Kline and Mr. Hicks observed several tank cars located in the cleaning area. The cleaning area was adjacent to and connected via open-grate trench to the sump (**See Attachment #1- Photo #24**). This area appeared neat and orderly.

Inspector Kline and Mr. Hicks proceeded to tour Building #2, The South Shop. This concluded the physical inspection portion of the IU Inspection.

III. Closing Conferences

After the inspections of CRS, Inspector Kline conducted a closing conference. Attending the closing conference were Ms. Creany, Mr. Flanders, Mr. Hicks and Inspector Kline. Inspector Kline shared preliminary observations about CRS. Inspector Kline reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. 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. Inspector Kline and Mr. Hicks left CRS at approximately 2:51 PM.

Inspector Kline conducted a similar closing conference with Mr. Hicks about the HRWWTP Industrial Pretreatment Program. Inspector Kline concluded the closing conference at 3:30PM.

IV. List of Attachments

Attachment 1. Photos

Attachment 2. NPDES Permit

Attachment 3. Jurisdictional Agreement- Logan Township

Attachment 4. 2022 Annual Report

Attachment 5. Industrial Discharge Survey Form

Attachment 6. 2022 Inspection Report- CRS

Attachment 7. 5/5/2022 Creany to Hicks e-mail

Attachment 8. HRWWTP Enforcement Response Guide

Attachment 9. Checklist

Attachment 10. IU Permit- CRS

Attachment 11. Slug Control Plan- CRS

Attachment 12. WW Pretreatment- Flow Diagram CRS

Attachment 13. Analytical Report- Fairways Laboratories 4/18/2022

Attachment 14. Layout Map- CRS