



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Pretreatment Compliance Inspection Report
Inspection Dates: 5/31/2022 to 6/1/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Program
Site/Facility Name: University Area Joint Authority
Site/Facility Mailing Address: 1576 Spring Valley Road
State College, PA 16801
Latitude/Longitude: 41.4190, -78.7506
County/Parish: Centre County
Permit Number: PA0026239
NAICS Code: 221320
Unique Project #: 3E22WN021A

Site/Facility Representative:

Tom Willson, Pretreatment Coordinator/Lab Director
Phone: (814) 238-5361 Email: twillson@uaja.org

Point of Contact



PADEP Representative:

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I. Introduction

On May 31st and June 1st, 2022, the United States Environmental Protection Agency, Region III (“EPA”), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an onsite Field Audit Inspection at the University Area Joint Authority (hereinafter, “UAJA” or “the Facility”). The Facility is located at 1517 Spring Valley Road, State College, Pennsylvania 16801 (**See Attachment #1- Photo #1**).

The purpose of the inspection was to observe the Facility’s compliance with the Federal Pretreatment Regulations 40 CFR § 403 and the Clean Water Act (“CWA”). The U.S. EPA lead inspector was Inspector Jim Kline (“Inspector Kline”). Prior to the inspection, notification was sent to the Pennsylvania Department of Environmental Protection (“PADEP”). Ms. Rachael Colyer, Water Quality Specialist, attended only the first day of the inspection. Inspector Kline provided the Facility with advance notification of the inspection.

A. Opening Conference

Inspector Kline arrived at the Facility on Tuesday, May 31st, 2022, at 9:30 AM and presented his credentials to Mr. Thomas Willson, Laboratory Director, and Pretreatment Coordinator for the Facility. Inspector Kline conducted an opening conference with Mr. Willson and Ms. Rachel Colyer, PA DEP Water Quality Specialist. Inspector Kline explained the purpose and scope of the inspection to Mr. Willson.

Inspector Kline requested that any information that UAJA deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures. Mr. Willson stated he did not believe there would be any CBI.

B. Weather and Precipitation Conditions

During the inspection, weather was clear. The closest National Oceanic and Atmospheric Administration (“NOAA”) National Weather Service precipitation data for the date of the inspection and five days prior are provided in Table 1 below.

Table 1. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/26/22	0.00
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/27/22	0.06
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/28/22	0.34
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/29/22	0.00
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/30/22	0.00
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	5/31/22	0.00
STATE COLLEGE 2.4 ENE, PA US US1PACN0003	6/1/22	0.00

II. UAJA Pretreatment Program

According to Mr. Willson, the UAJA consists of State College Borough, the College-Harris Joint Authority, and the Patton-Ferguson Authority. Inspector Kline asked if the UAJA also includes the Pennsylvania State University. Mr. Willson stated the University had its own wastewater treatment plant and is not included. Mr. Willson stated that the total Significant Industrial User (“SIU”) flow is 0.1 million gallons per day. According to Mr. Willson, UAJA has a design flow of 9 million gallons per day and an actual flow of 4.9 million. Mr. Willson provided Inspector Kline with his last completed Annual Reports for reporting purposes for 2020 (**See Attachment #2**) and 2021 (**See Attachment #3**). Mr. Willson stated he was behind in updating his current Annual Report.

Mr. Willson stated that they currently have four IUs. According to Mr. Willson, all of the IUs are SIUs. Two of the SIUs are Categorical Industrial Users (“CIUs”) and two are Significant Non-categorical Industrial Users (“SNIUs”). Mr. Willson stated that all IUs are hard piped to the UAJA Facility. Inspector Kline asked if UAJA accepts any hauled in wastes or wastes from Oil and Gas activities. Mr. Willson stated no wastes from Oil and Gas are accepted. According to Mr. Willson, UAJA accepts hauled in septage and sewage sludge only.

Inspector Kline asked how the Facility would identify new or potential IUs. Mr. Willson stated the main way was through their Codes Enforcement Office. Mr. Willson stated that if that office receives new plans for additions or building permits, then their Facility would be notified. Mr. Willson acknowledged that in the UAJA there were not many new buildings being built. Mr. Willson added it has been a challenge because the UAJA does not know what activities go on inside the existing buildings within the UAJA boundaries. Inspector Kline asked for further clarifications to Mr. Willson’s statement. Mr. Willson stated that, for example, for Applied Research Lab (ARL), a Defense Contractor within the UAJA, he didn’t know what activities happen in each of their buildings. Inspector Kline asked if UAJA would send out questionnaires to suspected IUs. Mr. Willson stated that was the common practice back in the early 1990s, but the Facility hasn’t sent out new questionnaires to possible IUs since about 1996. Mr. Willson

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

stated it would be very expensive and a “heavy lift” to identify new IUs. Mr. Willson added that it may be possible to determine unpermitted IUs by the water usage and increased billing at a particular location.

Inspector Kline requested to review all IU folders. Inspector Kline asked Mr. Willson if any IUs had any ongoing issues or permit exceedances. Mr. Willson stated in the past twelve months the IUs did not have any exceedances. Mr. Willson added that, in the past three years, API Technology had a nickel and copper exceedance in 2019 and Cintas had a cadmium exceedance in 2019. Inspector Kline completed the Field Audit Checklist with input from Mr. Willson (**See Attachment #4**). Inspector Kline selected Cintas of State College (hereinafter, “Cintas”) located at 2700 Carolean Industrial Drive in State College to conduct the IU physical portion of the Field Audit Inspection. Inspector Kline requested a copy of the IU Permit issued to Cintas (**See Attachment #5**).

Prior to adjourning the inspection for that day, Inspector Kline asked Mr. Willson what if any actions UAJA has taken regarding the Dental Amalgam Rule. Mr. Willson stated he sent out thirty-two letters to possible generators of dental amalgam within the boundaries of UAJA in December 2018. Mr. Willson stated he followed up in August 2020. Inspector Kline asked Mr. Willson if he sent his findings to EPA Region III. Mr. Willson stated he was never asked to forward his follow-up to Region III.

This concluded this portion of the inspection for May 31st, 2022. Ms. Colyer would not attend the second day of the inspection scheduled for June 1st, 2022.

III. Observations

Industrial User Field Visit - Cintas

Inspector Kline and Mr. Willson met at Cintas of State College at 9:00AM, on Wednesday June 1, 2022 (**See Attachment #1- Photo #2**). Mr. Andy Confer, Maintenance Supervisor, greeted Inspector Kline and Mr. Willson. Inspector Kline presented his credentials to Mr. Confer and conducted an opening conference. Attending from Cintas were Mr. Confer and Mr. Brian Gardner, Production Supervisor. Inspector Kline explained the purpose and scope of the inspection.

Inspector Kline requested that any information that Cintas of State College deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures. Mr. Confer stated that from what Inspector Kline would be observing, there wouldn’t be CBI.

Mr. Confer briefly described operations at the Cintas location. Mr. Confer stated there are over five-hundred Cintas locations world-wide, including China. Mr. Confer stated that their location operates from 3:00AM until 12:30AM and is covered by two shifts from Monday

through Friday. Mr. Confer stated that operations end at 5:00PM on Fridays. According to Mr. Confer, primary operations include laundry service for uniforms (shirts and pants), gloves, and area floor mats. Mr. Confer stated that the Cintas State College location does not conduct dry cleaning and does not generate any hazardous wastes. Inspector Kline asked Mr. Confer if Cintas of State College had any other county or state issued permits. Mr. Confer stated they only had their UAJA IU Permit.

Mr. Confer stated Cintas of State College has 72 employees and 18 trucks. Mr. Confer added the 18 truck each have their own routes and only service select areas in Pennsylvania.

Inspector Kline asked Mr. Confer to describe the process that involves wastewater sent to UAJA. Mr. Confer stated that the laundry machines discharge to a common floor drain that leads to the equalization pit. Mr. Confer stated that the heat from the wastewater is reclaimed and allowed to cool. Wastewater is directed to the shaker screen prior to entering the "Settle Tank". Mr. Confer stated that at this point, the pH is monitored and would be corrected using sulfuric acid. Mr. Confer added that they haven't used this part of the process for over two years as their pH typically ranges from 7.2 to 7.5. Mr. Confer further stated that they removed all water softening equipment about seven years ago as it wasn't needed for their city-supplied water. Inspector Kline asked Mr. Willson where the effluent samples were collected. Mr. Willson stated samples were collected from the Wastewater Building.

Inspector Kline asked Mr. Confer if he knew or could recall why Cintas had a cadmium exceedance in October 2019. Mr. Confer stated he could not offer an explanation why that exceedance occurred.

Mr. Confer provided Inspector Kline and Mr. Willson a tour of their facility. Inspector Kline observed the laundry operations. Inspector Kline observed wastewater being discharged from the laundry machines to the combined grated-top open floor drain system (**See Attachment #1- Photo #3**). Inspector Kline observed the Settling Tank and shaker screen (**See Attachment #1- Photos #4 & #5**). Inspector Kline and Mr. Willson were escorted to the Maintenance Building and observed the effluent sample location (**See Attachment #1- Photo #6**). Inspector Kline observed a Greyline Instruments, Inc. SLT32 Level and Flow Monitor (**See Attachment #1- Photo #7**). According to the calibration label on the monitor, the monitor was serviced and calibrated on July 16, 2014, and was due for service calibration in July 2015. Mr. Confer stated they check the pH with their own meter. According to Mr. Confer, weekly two-point calibrations are conducted using the pH 7 and pH 10 buffers. Inspector Kline observed a Plant Pro Fast pH2 pH meter (**See Attachment #1- Photo #8**).

Inspector Kline toured the Maintenance Shop and was introduced to Mr. Gary Beveridge, Maintenance Technician 1. Inspector Kline observed a flammable container storage cabinet. Inside the cabinet were a variety of aerosol cans (**See Attachment #1- Photo #9**). Inspector Kline asked Mr. Beveridge once an aerosol can was emptied what was done with it. Mr. Beveridge stated the aerosol cans would be thrown in the trash. Inspector Kline asked Mr.

Beveridge if Cintas had a written procedure for the management of waste aerosol cans. Both Mr. Beveridge and Mr. Confer stated they were not aware of any such procedure.

Inspector Kline conducted a brief closing conference. Attending from Cintas was Mr. Confer and Mr. Beveridge along with Mr. Willson from UAJA. Inspector Kline concluded the IU physical inspection portion of the inspection and left Cintas at 11:30AM.

POTW Field Visit

Inspector Kline returned to UAJA on Wednesday, June 1st, 2022, and met with Mr. Willson. Inspector Kline reviewed the NPDES Permit No. PA0026239, which was effective from October 1, 2019, until September 30, 2024. According to the permit, UAJA discharges to Spring Creek which is a High-Quality Trout Stream.

Inspector Kline asked Mr. Willson if UAJA had any exceedances or problems at the facility. Mr. Willson stated last month, they had some blower problems that required pipes to the blowers to be swapped out. According to Mr. Willson this led to the weekly ammonia levels to be exceeded. Mr. Willson provided Inspector Kline with the permitted effluent limits for ammonia-nitrogen along with the monthly Lab Sheets (**See Attachment #1- Photos #10, #11 & #12**).

Inspector Kline asked Mr. Willson if UAJA experienced any pass-through or interference. Mr. Willson stated UAJA experienced a flooding issue in the Spring of 2019 where they had a bypass event that also resulted in high total suspended solids (TSS) and high phosphorus.

Mr. Willson stated UAJA did receive a Notice of Violation from the PADEP on November 10, 2021 (**See Attachment #6**). Mr. Willson stated the violations covered exceedances from August 31, 2017 (monitor end date) until August 31, 2021 (monitor end date). Mr. Willson added that the letter also indicated that UAJA failed to monitor pollutants in the following months and years: August 2018, April 2019, November 2019, January 2020, February 2020, April 2020, June 2020, December 2020, and January 2021.

Mr. Willson escorted Inspector Kline on a tour of the UAJA facility. The tour included the laboratory, and a walk through of the treatment operations. Inspector Kline observed the influent composite sampler (**See Attachment #1- Photos #13 & #14**) and effluent composite sampler (**See Attachment #1- Photos #15 & #16**). Both composite samplers were ISCO model 5800. Each refrigerated compartment had a thermometer indicating the temperatures were 6 degrees Celsius at the influent and 4 degrees Celsius at the effluent. Inspector Kline observed the effluent outfall and confluence with Spring Creek (**See Attachment #1- Photos #17, #18, #19 & #20**). Lastly, Mr. Willson escorted Inspector Kline to the advanced water treatment facility. According to Mr. Willson, this facility produces non-potable water that has undergone filtration, reverse osmosis, and additional purified reverse osmosis treatment.

This concluded the physical inspection portion of the inspection.

IV. Closing Conference

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

V. Follow-up Communications

Inspector Kline received eight e-mails from Mr. Willson (five received on May 31, 2022, two received on June 1, 2022, and one on June 10, 2022). The e-mails pertained to documentation requested by Inspector Kline or information regarding this inspection.

VI. List of Attachments

Attachment 1: Photos

Attachment 2: UAJA 2020 Reporting Spreadsheet

Attachment 3: UAJA 2021 Reporting Spreadsheet

Attachment 4: Field Audit Checklist

Attachment 5: Cintas IU Permit

Attachment 6: PADEP NOV