



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ELECTRONIC MAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Mr. William Mark Phillips
Phillips Plating Company
1617 US Highway 17 North
Bridgeton, North Carolina 28519

Re: Reconnaissance Inspection Report
Phillips Plating Company Inc.
National Pollutant Discharge Elimination System Permit No.: NC0001881

Dear Mr. Phillips:

The U.S. Environmental Protection Agency, Region 4 inspected the Phillips Plating Company located at 1617 US Highway 17 N, Bridgeton, NC 28519 on October 19, 2021, for compliance with its National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA).

The inspections findings and recommendations are provided in the enclosed Reconnaissance Inspection Report. If you have any questions about the inspection report, please contact Richard Elliott at 404-562-8691 or via email at Elliott.Richard@epa.gov.

Sincerely,

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.12.10
15:23:55 -05'00'

Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enclosure

cc: Robert Tankard
NCDEQ

John Hennessy
NCDEQ

Bob Sledge
NCDEQ

	United States Environmental Protection Agency Region 4 CV-NC-0001881-10-19-2021 Reconnaissance Inspection Report
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SECTION A: National Data System Coding				
NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
NC0001881	10/19/2021	ROS (Reconnaissance without Sampling)	Richard Elliott/Tristan Odekirk	Industrial wastewater facility

SECTION B: Facility Data		
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Phillips Plating Company 1617 US Highway 17 N Bridgeton, North Carolina 28519	Entry Date/Time 10/19/2021 1:00 PM Exit Date/Time 10/19/2021 1:40 PM	Permit Effective Date 7/1/2021 Permit Expiration Date 8/31/2025
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) William Mark Phillips 252) 637-2695 Jerry Phillips, George Phillips, Manager/Owner	Other Facility Data N/A	
Name, Address of Responsible Official/Title/Phone and Fax Number William Mark Phillips Phillips Plating Company 1617 US Highway 17 N Bridgeton, North Carolina 28519 (252)-637-2695	Contacted ☒ Yes ☐ No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)							
☒	Permit	☒	Flow Measurement	☒	Operation & Maintenance	☐	CSO/SSO (Sewer Overflow)
☒	Records/Reports	☐	Self-Monitoring Program	☒	Sludge Handling/Disposal	☐	Pollution Prevention
☒	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☐	Effluent/Receiving Waters	☐	Laboratory	☐	Storm Water	☐	Other:

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)
See the attached narrative of Findings/Comments.

Name(s) and Signature(s) of Inspector(s): Elliott, Richard Richard Elliott, P.E.	Agency/Division/Phone Number EPA/ECAD/(404) 562-8691	Date 12/10/2021
Signature of Management QA Reviewer: JAIRO CASTILLO Jairo Castillo, P.E.	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9257	Date 12/10/2021



United States Environmental Protection Agency
Region 4
CV-NC0001881-10-19-2021
Water Compliance Inspection Report
(Continued)

Section D: Summary of Findings / Comments

On October 19, 2021, the U.S. Environmental Protection Agency, Region 4 conducted a Reconnaissance Inspection (RI) at the Phillips Plating Company (the Facility) located in Bridgeton, NC. EPA met with Mr. Mark Phillips and reviewed the Facility's monitoring records and discussed the facility's self-monitoring program. The following is a summary of the inspection findings and observations.

I. Records/Reports

The inspection observations verified the permit information regarding the name, description of the Facility, location of the permitted outfall, and the location of the receiving waters. A copy of the permit was kept at the Facility.

Discharge Monitoring Reports (DMRs), records and reports for May 2019 and August 2021 were checked for agreement with NPDES self-monitoring program requirements regarding sampling documentation, equipment calibration, and reporting of parameter concentrations and loadings. The self-monitoring records, including chain of custody records, calibration sheets, laboratory bench sheets, and commercial laboratory results, were maintained for a minimum of three years. Spot checking of NPDES monitoring data elements was conducted and the data reviewed was found to be consistent and accurately reported. The Facility has not been able to consistently meet Copper and/or zinc effluent limits. Improvements to the operations and treatment units may be needed to achieve consistent compliance. The Facility does not operate continuously and according to the operator, limit excursion has occurred in the past at start-up after a period of dormancy.

II. Facility Site Review

Phillips Plating Company consists of several lines of metal plating processes. Liquid from the plating lines is sent to a series of collection basins where it is combined and sent to an on-site treatment plant. The treatment plant consists of a flocculation and sedimentation system. Polymer flocculent is added in one chamber, mixed, and sent to a clarifier. The solids from the clarifier are sent to a filter press. Cake from the filter press is sent to an industrial waste handler. Filtrate from the press is returned to the beginning of the treatment process. Effluent from the clarifier is sent through a granular activated carbon filter. Depending on workload, effluent is either reused in the process or discharged to the Neuse River.

The Facility is in general disrepair. Both the building and the treatment works need repairs. There were holes in some portions of the roof. Several walkways were in need of repair. Several tanks contained very corrosive chemicals. No secondary containment for these chemicals was observed.

Recommendations

Install secondary containment for corrosive chemicals and make the necessary repairs to the treatment facility.

III. Flow Measurement

The Facility is permitted to treat 0.1 MGD and on average treats 2,000-6,000 gallons per week. No flow measurement device was observed. The facility recycles a large portion of the treated effluent from the wastewater facility. The Facility does not recycle 100% of the treated effluent.

IV. Self-Monitoring Program

All sampling analytics and testing are conducted by Environmental 1. In-situ sampling is conducted by on site operators.

Recommendations

The Facility should consider fully recycling treated effluent.

V. Operation & Maintenance

The Facility is operated by three owners/employees. Operation is conducted on an as needed basis in a batch process. There are two main lines of operation: zinc and nickel/chromium plating.

VI. Sludge Handling

The solids from the treatment process are sent to a filter press. Cake from the filter press is sent to an industrial waste handler.

VII. Effluent/Receiving waters

Receiving water could not be observed. At the time of inspection there was no discharge from the Facility.

VIII. Recommendations Summary

1. Install secondary containment for corrosive chemicals in plating line.
2. Consider fully recycling treated effluent.

End of Report