

Williamsport Sanitary Authority (PA0027057 and PA0027049)
Pretreatment Compliance Inspection



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): March 18-20, 2024
March 27, 2024 (Exit Interview)
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: Williamsport Sanitary Authority
Facility Address: 253 W 4th Street, Williamsport, PA 17701
Facility Latitude: 41.239915
Facility Longitude: -77.006408
County/Parish: Lycoming County
Permit No: PA0027057 (Central WWTP) and PA0027049 (West WWTP)
NAICS Code: 221320
SIC: 4952
Unique Project #: ECAD-436 and ECAD-460

Facility Representatives:	Point of Contact
Wendy Walter, Director of Compliance, Safety and Security	
Email: wwalter@wmwa-wsa.org	☒
Michael Miller, Executive Director	
Email: mmiller@wmwa-wsa.org	
Drew Zimmerman, Compliance Supervisor	
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Inspectors:
Chuck Durham, Eastern Research Group
Email: chuck.durham@pgenv.com
Yatasha Moore, Eastern Research Group
Email: yatasha.moore@pgenv.com

(List of additional attendees in Table 1)

Report Preparer	<u>Yatasha Moore</u>	<u>05/17/2024</u>
Signature/Date	Yatasha Moore, Eastern Research Group	Date
Supervisor		
Signature/Date	<u>Jessica Duffy, NPDES 2 Section Chief</u>	<u> </u> Date

Unique Project#: ECAD-436, ECAD-460

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

Williamsport Sanitary Authority (PA0027057 and PA0027049)
Pretreatment Compliance Inspection 3/18/2024 – 3/20/2024

I. Inspection Summary

Upon arrival at the Williamsport Sanitary Authority (WSA or Facility), EPA contractors Chuck Durham and Yatasha Moore, and United States Environmental Protection Agency (EPA) Region 3 representatives James Kline and Edward Simas (jointly referred to as the Inspection Team), met with the Facility representatives). See Table 1 below for a full list of attendees. WSA owns and operates the Central Wastewater Treatment Plant (WWTP) and the West WWTP. The inspectors discussed the purpose and format of the pretreatment compliance inspection (PCI or inspection) and interviewed the Facility representatives about the Facility's pretreatment program. The weather was cool and sunny throughout the week during the inspection.

Table 1: Additional Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Edward Simas	Environmental Protection Agency	(215) 814-2120	Simas.Edward@epa.gov
James Kline	Environmental Protection Agency	(304) 234-0263	Kline.James@epa.gov
Chuck Durham	EPA Contractor, Eastern Research Group	(615) 888-2928	Chuck.Durham@pgenv.com
Yatasha Moore	EPA Contractor, Eastern Research Group	(615) 776-3169	Yatasha.Moore@pgenv.com
Site/Facility Representatives			
Wendy Walter	Director of Compliance, Safety and Security – WMWA-WSA	(570) 323-6140	wwalter@wmwa-wsa.org
Michael Miller	Executive Director – WMWA-WSA	Not Provided	mmiller@wmwa-wsa.org
Drew Zimmerman	Compliance Supervisor – WMWA-WSA	Not Provided	dzimmerman@wmwa-wsa.org
State or County Representatives			
N/A	No state representatives in attendance		

As part of the PCI, the Inspection Team reviewed the following nondomestic discharger files:

- Arxada (categorical industrial user [CIU] subject to *Title 40 of the Code of Federal Regulations* [40 CFR] 414 Organic Chemicals, Plastics, and Synthetic Fibers Point Source Category and 40 CFR Part 455 Pesticide Chemicals Point Source Category)
- Eureka Resources (CIU subject to 40 CFR Part 437 Subpart C Centralized Waste Treatment Organics Treatment and Recovery)
- Lycoming Engines (CIU subject to 40 CFR 433.17 Metal Finishing Pretreatment Standards for New Sources)
- Frito-Lay (non-categorical significant industrial user ([SIU])

As part of the inspection, the Inspection Team also conducted site visits at Arxada, Eureka Resources, Lycoming Engines, and Frito-Lay. Upon arrival at each site visit, the Inspection Team presented credentials to the industry representatives. The Inspection Team informed industry representatives that any information that the industry 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

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EPA's CBI procedures.

The last EPA Region 3 review of the Facility's pretreatment program was a PCI performed in 2017.

II. Program Description

The Central WWTP has a design capacity of 10.5 million gallons per day (MGD) with an average flow of approximately 6.415 MGD in 2022. The West WWTP has a design capacity of 5.8 MGD with an average flow of approximately 2.682 in 2022. The Central WWTP provides tertiary treatment with filtration for denitrification. The West WWTP provides secondary treatment and disinfection with chlorination. Solids are hauled to the Lycoming County Municipal Landfill for disposal.

According to the Facility representatives, WSA accepts wastewater from the City of Williamsport, Loyalsock Township, Woodward Township, the Borough of South Williamsport, DuBoistown Borough, Armstrong Township, and Old Lycoming Township. The Facility owns and operates the collection systems in the City of Williamsport, Loyalsock Township, and Woodward Township.

III. Industrial User (IU) Characterization

IUs currently identified by the Control Authority (CA)	IU Type
19	Discharging Significant Industrial Users
14	Discharging Non-Categorical SIUs (as defined by the CA)
5	Categorical Industrial Users (CIUs)
0	Middle Tier CIUs
0	Zero-Discharging CIUs
0	Non-significant CIU (NSCIU)
0	Other Regulated IUs (e.g., permitted IUs) Describe: Not applicable (N/A)
0	Waste Haulers Describe: The Facility does not issue permits to waste haulers. See Section G.1 for additional information.

IV. Findings Summary Table

Finding C.4.a – The permits reviewed do not specify that the records retention period may be extended during unresolved litigation.
Finding C.4.b – The CIU permits reviewed did not require notification of upsets.
Finding C.4.c – The permits reviewed did not include a provision for providing a copy of the current permit to the new owner or operator when the permit is transferred.
Finding C.4.d – The permits reviewed did not include a requirement for the industry to notify the Facility of changes affecting the potential for a slug discharge.
Finding C.4.e – The Eureka Resources permit does not specify whether the CIU is a new or existing source.
Finding D.1 – It was unclear if the Authority has applied the solvent treatment exemption in 40 CFR 437.1(b)(11) to the Eureka Resources discharge.

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IV. Findings Summary Table

Finding E.5 – The Facility has not been analyzing the required SIU reports.
Finding F.1 – The Facility failed to implement its ERP.
Frito-Lay Site Visit Data Sheet – The SIU was using an expired pH buffer to calibrate the pH meter.
Eureka Resources Site Visit Data Sheet – The Inspection Team observed a sink without signage in the truck desk lab.
Eureka Resources Site Visit Data Sheet – The Inspection Team observed multiple open buckets of waste oil without secondary containment.
Arxada Site Visit Data Sheet – The Inspection Team observed chemicals with secondary containment.
Arxada Site Visit Data Sheet – The Inspection Team observed totes labeled as hazardous waste without secondary containment.
Arxada Site Visit Data Sheet – The Inspection Team observed a sink without signage in the lab.
Arxada Site Visit Data Sheet – The pH calibration records did not document calibration across the full range of potential pH readings.

V. Evaluation

The Inspection Team discussed the topics in Subsections A-F below regarding the pretreatment program with the Facility 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 program areas of concern identified during the inspection process along with compliance assistance items, and associated references to 40 CFR Part 403. All compliance assistance items are included strictly for informational purposes and should not be construed as a formal order or instruction from EPA.

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)

According to the Facility representatives, the Facility last revised its local limits for the Central WWTP in 2023 and for the West WWTP in 2018. The revised local limits were submitted to EPA Region 3 for approval (approval letter dated September 26, 2023, for the Central WWTP and October 3, 2018, for the West WWTP). The Facility most recently updated its Rules and Regulations in 2008 to incorporate the pretreatment streamlining changes. The Facility updated its Enforcement Response Plan (ERP) in 2015 based on comments in 2014 from the pretreatment compliance audit report. According to the Facility representatives, the Facility was in the process of evaluating the need to recalculate local limits for the West WWTP due to the reissuance of the NPDES permit.

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

According to the Facility representatives, WSA accepts wastewater from the City of Williamsport, Loyalsock Township, Woodward Township, the Borough of South Williamsport, DuBoistown Borough, Armstrong Township, and Old Lycoming Township. The Facility owns and operates the collection systems in the City of Williamsport, Loyalsock Township, and Woodward Township. According to the Facility representatives, the Facility has agreements with each contributing jurisdiction.

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))

The Facility representatives stated that the Facility's Industrial Waste Survey (IWS) is updated annually. The Facility also reviews industrial billing quarterly and sewer crews are trained to look for potential industrial dischargers. Additionally, applications for sewer service are reviewed by a member of the Facility's pretreatment staff. The Facility maintains a list of non-significant industrial users and these facilities are inspected at least once in a five-year period.

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 Facility conducts inspections and compliance monitoring at each SIU at least annually.

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 Facility maintains a current list of SIUs, which it submits in the annual reports to EPA Region 3. The facility had not designated any SIUs as NSCIUs at the time of the inspection.

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 two to three years. The Facility 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)**

N/A. The Facility 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 Facility 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**

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- 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 included most, but not all of the aforementioned provisions. Findings regarding the content of individual control mechanisms are provided below. The Facility had not issued general control mechanisms at the time of the inspection.

Finding C.4.a – The permits reviewed do not specify that the records retention period may be extended during unresolved litigation.

The permits reviewed contain records retention requirements. However, the permits do not state that the retention period is automatically extended during unresolved litigation.

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.”

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.*

Finding C.4.b – The CIU permits reviewed did not require notification of upsets.

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 403.16 require industrial users to notify the Facility of upsets.

Finding C.4.c – The permits reviewed did not include a provision for providing a copy of the current permit to the new owner or operator when the permit is transferred.

Part B.2.h of the permits reviewed state several requirements for the transfer of permits. However, the permits do not include a provision for the new owner or operator to receive a copy of the current permit.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(2) require permits to include a “[s]tatement of non-transferability without, at a minimum, prior notification to the POTW and provision of a copy of the existing control mechanism to the new owner or operator.”

Finding C.4.d – The permits reviewed did not include a requirement for the industry to notify the Facility of changes affecting the potential for a slug discharge.

Regulatory Requirement

The federal regulation at 403.8(f)(2)(vi) requires SIUs to notify the Control Authority immediately of any changes at the facility affecting the potential for a slug discharge.

Finding C.4.e – The Eureka Resources permit does not specify whether the CIU is a new or existing source.

The permit for Eureka Resources states that the CIU is subject to the categorical standards in 40 CFR Part 437. However, the permit does not state whether the CIU is a new or existing source.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to contain effluent limits based on categorical pretreatment standards and local limits. In addition, 40 CFR 403.8(f)(2)(iii) requires POTWs to notify industrial users of applicable pretreatment standards and requirements.

D. Application of Pretreatment Standards and Requirements

1. Does the CA apply all applicable pretreatment standards? (40 CFR 403.8(f)(1)(ii) and 403.8(5))

Based on the permits reviewed the Facility applies all applicable pretreatment standards correctly other than as noted here.

Finding D.1 – It was unclear if the Authority has applied the solvent treatment exemption in 40 CFR 437.1(b)(11) to the Eureka Resources discharge.

The Inspection Team could not find any documentation in the Eureka Resources discharge permit or Fact Sheet to indicate the exemption for distillation processes had been applied to the discharger.

Regulatory Requirement

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The federal regulations at 40 CFR 437.1(b)(11) state that wastewater resulting from solvent recovery operations, if the solvent recovery operations involve the separation of solvent mixtures by distillation, are exempt from this category.

2. Has the CA evaluated the need for SIUs to develop slug discharge control plans? (40 CFR 403.8(f)(2)(vi))

Yes. According to the Facility representatives, all SIUs have been evaluated for the need to develop slug discharge control plans, and all were determined to need one.

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 Facility representatives, the Facility has been conducting inspections and sampling at least once per year. The Facility did not have any CIUs designated as middle tier CIUs and had not issued waivers for pollutants not present.

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))

In general, according to the information reviewed during the inspection, the Facility uses proper sampling, analysis, and inspection procedures.

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 Facility 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))

N/A. The Facility was not implementing the option to classify industries as NSCIUs at the time of the inspection.

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**

Based on the files reviewed during the inspection, the Facility has been requiring, and receiving required reports. However, the Facility has not been analyzing all required reports.

Finding E.5 – The Facility has not been analyzing all required SIU reports.

The Inspection Team observed that the April 2023 and July 2023 self-monitoring reports for Eureka Resources indicated that the analytical detection levels exceeded the required detection levels in the SIU's permit. However, as noted in Finding F.1 below, the Facility did not take enforcement for failure to meet these permit requirements.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(iv) require the POTW to “[r]eceive and analyze self-monitoring reports and other notices submitted by Industrial Users.”

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

Yes, based on the files reviewed, SIUs have 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 files reviewed during the inspection, the Facility 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))

Yes. Based on the file reviewed, the Facility has ensured that non-categorical SIUs self-monitor and report at least once every six months.

9. Has the CA required self-monitoring reports from CIUs to be signed and certified? (40 CFR 403.12(b)(6), 403.12(i))

Yes. The CIU files reviewed included signed and certified self-monitoring reports.

10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12 (j) & (p))

No, the Facility representatives stated that the facility 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))

No.

Finding F.1 – The Facility failed to implement its ERP.

Based on discussion with the Facility representatives during the interview and observations from the SIU file reviews, the Facility is not implementing its ERP in every instance of SIU noncompliance. Specifically, the Facility is not issuing verbal warnings or Notices of Violation (NOVs) for late self-monitoring reports and not escalating enforcement for repeat offenses. The Inspection Team observed that Eureka Resources submitted multiple self-monitoring reports more than 2-31 days late; however, there was no documentation of WSA taking enforcement action for these late reports.

Regulatory Requirement

The federal regulations at 40 CFR §403.8(f)(5) require that the POTW develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance.

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 Facility evaluates SNC according to the definition in its SUO. The Facility publishes a list of SIUs in SNC in *The Williamsport Sun Gazette*.

2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.

No, the Facility did not have any SIUs in SNC in the last year.

3. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A))

The Facility has the legal authority to develop and implement compliance schedules. There were no SIUs under a compliance schedule at the time of the Inspection.

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 Facility 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 Inspection Team did not review BMRs or 90-day monitoring reports as part of the review.

G. Additional Evaluations

1. Hauled Waste

According to the Facility representatives, the Facility does not accept hauled waste at either the Central WWTP or the West WWTP.

2. Dental Mercury Program

According to the Facility representatives, there are 22 dental facilities in the service area and the Facility has received the one-time certification statements from all 22 dental facilities.

3. Fats, Oils, and Grease (FOG) Program

The Facility does not issue permits to food service establishments and does not operate a FOG program.

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: Frito-Lay					
Address of industry: 220 North Reach Road, Williamsport, PA					
Date of visit: 3/18/2024			Time of visit: 1:10 PM – 3:45 PM		
Name of inspectors: Wendy Walter and Drew Zimmerman (WSA) Chuck Durham and Yatasha Moore (Eastern Research Group) James Kline and Edward Simas (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Brooke Smith		Site Director			
Grace Lescavage		Warehouse Department Manager and Performance Manager			
Chad Lorson		Maintenance Resource			
Alex Saul		Technical Senior Manager			
Shaun Yerger		EHS Coordinator			
John Cramer		Region EHS Manager (via phone)			
IU Permit Number: W-3		Exp. Date: November 30, 2026		IU Classification: Non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility produces corn-based snack foods, including fried Cheetos, Baked Cheetos, Funyuns, and Restaurant Style Tostitos Chips.					
2. Number of employees:		~210		Number of shifts: 3	
				Hours of operation: 24 hours/day, 7 days/week	
3. Wastestream flow(s) discharged to the POTW:					
The SIU generates wastewater from the sanitation process used to clean production equipment.					
Sanitary:		Not provided		Process:	
				Not provided	
				Combined:	
				~43,600 gpd (based on 2023 permit application)	
4. Describe any significant changes in process or flow: The SIU representatives stated that the industry was in the process of upgrading its wastewater treatment system with a planned completion of mid-April 2024. Once the new wastewater system is in place, all sanitation waste will go to an oil/water separator with skimmers. Oil from the oil/water separator will go to a heated oil tank before being hauled off-site for disposal. Corn cleaning water will go to the existing wastewater pit. It will then be pumped through a grit removal system before being combined with sanitation wastewater. The current grease trap will be converted to a rapid pH adjustment tank for treatment of the combined wastewater stream before flowing to the current equalization tank.					
5. Type of pretreatment system (Describe): Wastewater flows through an approximately 275-gallon grease trap with a baffle. Wastewater then flows to an equalization tank for pH adjustment with sodium hydroxide and sulfuric acid prior to being discharged to sewer.					

X	Continuous flow		Batch		Combined
6. Process area description: For the Tostitos line, the SIU receives raw corn and removes debris using a shaker process. The corn is then cooked in a kettle with hot water and lime before soaking for 12 hours to loosen the corn hulls. The corn is washed with city water and then milled with stone mills. Water and enzymes are added through a feeder to a dough which is sheeted. The dough is cut into shapes, dried in an oven, fried in corn oil, and salted. The finished chips are packaged for shipment. The facility receives corn meal for the fried Cheetos, Baked Cheetos, and Funyuns lines. The corn meal is sifted to remove flour before the corn meal is transferred to the production lines. For the Baked Cheetos line, corn meal is mixed in a blender with water and other ingredients, extruded into shapes, and baked in an oven. The product is seasoned in a tumbler with a cheese slurry before it is packaged. For the fried Cheetos line, corn meal is mixed with water and other ingredients before it is passed through a series of five extruders. The product is then fried before being seasoned in a tumbler with a cheese slurry and then packaged. For the Funyuns line, corn meal is mixed with water, buttermilk, onion flavoring, and other ingredients in a blender. The product passes through a series of five extruders before being fried. A dry, topical seasoning is placed on the product prior to packaging. Oil in the fryers is changed at each shutdown (every 6-13 days based on production). The facility adds make-up oil as needed to all fryers during production. Facility representatives stated that a spill occurred in the past during the clean-out of the kettle and inclined belt press. This spill drained to the wastewater treatment plant and was discovered the following morning through sampling results. Facility representatives provided a maintenance log during the inspection documenting the date and causes of spills. The spill from the kettle occurred due to a missing catch pan and a missing latch/rod which prevent spilled waste. No spills were observed during the inspection.					
7. Chemical storage area: The facility stored 55-gallon drums of clean-in-place (CIP) chemicals in a chemical storage room without floor drains. Chemicals stored in this area include sodium hydroxide, sodium chloride, and Quorum Pink cleaner. Chemicals were stored in secondary containment.					
Any floor drains?		Yes	Any spill control measures?		Yes; secondary containment and spill kits located throughout the facility
8. Are hazardous wastes drummed and labeled? Not determined.					
9. Does the IU have hazardous waste manifests? Hazardous waste is hauled offsite by Miller Environmental. The Inspection Team reviewed the most recent hazardous waste manifest during the site visit.					

10. Solid waste production and disposal: Flour removed from the corn meal, damaged packaged food, and food debris are placed into a food compactor. This waste is hauled off-site for use as cow feed.

11. Description of sample location and methods: The SIU collects grab samples from the discharge from the equalization tank. The samples are sent to a contract lab, Environmental Laboratory Services, for analysis.

Notes:

1. Finding – The SIU was using an expired pH buffer to calibrate the pH meter.

The SIU performs weekly calibration of its pH meter using pH 4, 7, and 10 buffer solutions. However, the Inspection Team observed the pH 7 buffer solution expired in January 2024.

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Eureka Resources					
Address of industry: 454 Pine Street, Williamsport, PA					
Date of visit: 3/19/2024			Time of visit: 9:45 AM – 12:05 PM		
Name of inspectors: Wendy Walter, Drew Zimmerman, and Michael Miller (WSA) Chuck Durham and Yatasha Moore (Eastern Research Group) James Kline and Edward Simas (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Chad Snyder		Plant Manager			
IU Permit Number: C-20		Exp. Date: July 31, 2024		IU Classification: CIU subject to 40 CFR Part 437, Subpart C	
Please provide the following documentation:					
1. Nature of operation: According to the facility representative, the facility treats water from treated and untreated oil and gas operations, including compressor and fracking sites. The facility also treats containment water from the same sites. According to the facility's 2022 application lists oil and gas wastewaters as "flowback water, produced water, drilling fluids/muds, and gathering system wastewater."					
2. Number of employees:	12	Number of shifts:	2	Hours of operation:	24 hours, 3 days a week; 7 AM – 7 PM 4 days a week
3. Wastestream flow(s) discharged to the POTW:					
The SIU generates wastewater from the treatment of oily and methanol containing wastewaters.					
Sanitary:	Not provided	Process:	Not provided	Combined:	~28,200 gpd (based on 2022 permit application)
4. Describe any significant changes in process or flow: None.					
5. Type of pretreatment system (Describe): See process description.					

	Continuous flow	X	Batch		Combined
6. Process area description: The Inspection Team began the walk through of the facility at the truck desk. The facility was not accepting any new trucks at the time of inspection. Mr. Chad Snyder stated that all operations were down for maintenance. When trucks arrive, a sample is collected. Truck drivers that are employed by Eureka are allowed to collect their own samples. An SIU employee collects the sample for trucks that are driven by third party companies. Inside the truck desk lab, samples are analyzed for specific gravity, sulfate, and barium in order to determine the appropriate treatment. Additionally, the samples are centrifuged if visual oil is observed in the sample. Sample retains are held for approximately one month in case additional analysis is needed. The Inspection Team observed a bucket in the lab that was used to discard lab waste and another bucket near the sample retain storage area used to discard spent sample retains. According to the facility representative, these waste oil buckets are disposed by pouring into a tank that pumps through the facility's treatment system. The Inspection Team observed the facility's filter press. According to the facility representative, the filter press has not been cleaned in the last year. The Inspection Team observed that the filter press appeared to be well maintained. The Inspection Team observed receiving tanks (RT tanks) 1-4. Truck loads may be discharged into any of these four tanks depending on the tank contents. Additionally, RT 1 typically receives return water from the facility's methanol column. The Inspection Team then proceeded to the facility's "B" side area. The RT tanks pump to 3 pH tanks in series in this area. Coagulant is added in pH tank 1. Sodium hydroxide is added to pH tank 2. If needed, additional coagulant is added in pH tank 3. Water from pH tank 3 flows through the floc tank, then the clarifier, and then to the Finals tank. Oil from the clarifiers is placed into totes and solids from the clarifier are sent to the facility's filter press. The Finals tank discharges to the facility's Nomad feed tanks. The Inspection Team then proceeded to the facility's "A" side area where the facility places a lot of consolidated oil in totes. The totes will stay in this area for a period of time to allow the water to migrate out of the oil. The facility then decants the water off the bottom of the totes. Once the oil in the totes reaches the desired specific gravity, the oil is placed in the feed tanks. The Inspection Team observed a floor drain in this area that pumps back to the sump receiving tank (SRT) to be treated. The Inspection Team then proceeded to the facility's Nomad area. Tanks N1 – N9 contain water to feed the Nomad system and methanol treatment process. Water in tanks N5-N9 are pumped to the Nomad system where steam is added. Clean water from the Nomad system is pumped to a surge tank. Water is stored onsite prior to being discharged to sewer. Purge from the Nomad system is used for reuse water. The Inspection Team proceeded outside to the facility's methanol treatment area. Water in tanks N1-N4 are pumped to the methanol treatment system. The facility's methanol treatment consists of a methanol distillation column. Water from the column is pumped to RT1. Additionally, water in the containment area is pumped to the RT tanks as needed based on precipitation (see Photograph 3 in Attachment B).					

7. Chemical storage area: Chemicals were stored in drums and totes in the facility's "B" side area.			
Any floor drains?	Yes	Any spill control measures?	Yes; secondary containment
8. Are hazardous wastes drummed and labeled? Not determined.			
9. Does the IU have hazardous waste manifests? Yes.			
10. Solid waste production and disposal: Empty sample bottles and other trash is hauled to the landfill. According to Mr. Snyder, the facility generates approximately one roll-off of sludge every six to eight months. Sludge is hauled to White Pine Landfill, and has the potential to have Technologically Enhanced Naturally Occurring Radioactive Materials.			
11. Description of sample location and methods: Samples are collected from the discharge pipe near the filter press. Samples are collected using flow-proportional composite samples. Samples are analyzed by contract laboratories Geochem Laboratories and Environmental Laboratory Services.			
Notes:			
The Inspection Team requested copies of a recent bill of lading and a sample ticket from a third party hauler. These documents were received via email on March 19, 2024. The inspection team requested the last 5 months of DMRs (4 qtrs in 2023 and 1st qtr of 2024) and expect to receive those after this report is finalized; those reports will be added to the inspection file when received.			
1. <u>Finding – The Inspection Team observed a sink without signage in the truck desk lab.</u> The Inspection Team observed a sink in the truck desk lab. According to the facility representative, the sink discharges to sewer through the SIU's sanitary connection, and the sink lab is used to for washing dishes and handwashing (see Photograph 1 in Attachment B).			
2. <u>Finding – The Inspection Team observed open buckets of waste oil without secondary containment.</u> The Inspection Team observed open buckets of waste oil without secondary containment in both the truck desk lab and near the sample retains storage area. According to the facility representative, the buckets are used to collect spent samples and emptied into the facility's treatment process when full (see Photograph 2 in Attachment B).			

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Lycoming Engines					
Address of industry: 625 Oliver Street, Williamsport, PA					
Date of visit: 3/19/2024			Time of visit: 1:35 PM – 4:05 PM		
Name of inspectors: Wendy Walter, Drew Zimmerman, and Michael Miller (WSA) Chuck Durham and Yatasha Moore (Eastern Research Group) James Kline and Edward Simas (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Brad Cooledge		EHS Manager			
Anna Sholtis		Environmental Analyst			
Tom Wrench		Manager of Maintenance and Facilities			
IU Permit Number: C-2		Exp. Date: September 30, 2025		IU Classification: CIU subject to 433.17	
Please provide the following documentation:					
1. Nature of operation: The facility produces and repairs piston aircraft engines.					
2. Number of employees:	~100	Number of shifts:	3	Hours of operation:	24 hours Monday-Friday; Saturday and Sunday as needed
3. Wastestream flow(s) discharged to the POTW: The facility discharges treated wastewater from various metal working operations to WSA's collection system. The facility's categorical process wastewater (regulated under the metal finishing standards) is discharged through its NPDES permit outfall. However, ancillary categorical process wastestreams discharge to the WSA collection system.					
Sanitary:	Not provided	Process:	Not provided	Combined:	~12,800 gpd (based on 2022 permit application)
4. Describe any significant changes in process or flow: The facility installed wastewater holding tanks for the Zyglo, mopping, and coolant wastewaters approximately three months prior to this visit. A second filter press was installed approximately two months prior to this visit. According to the facility representatives, the SIU is planning to replace some of the older equipment with newer machines.					
5. Type of pretreatment system (Describe): Zyglo, mopping, and coolant wastewaters are pumped into three separate tanks. Wastewater is pumped to an oil/solids separator. Oil from the separator is placed into a drum for off-site disposal. After the oil/solids separator, wastewater is pumped to an approximately 1,500 gallon equalization tank that is continuously mixed. From the equalization tank, wastewater is pumped to a batch tank. In the batch tank, calcium polysulfide, coagulant, sodium hydroxide, and polymer are added based on a computer-controlled program. Wastewater is then allowed to settle. Solids from the treatment system are pressed and hauled to the Lycoming County landfill as non-hazardous waste. Treated water is pumped to a holding tank prior to discharge to sewer.					

X	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): The facility performs various metal working processes on aircraft parts, including final assembly. Processes include piston head manufacturing, crankshaft manufacturing, barrel manufacturing, assembly, QA/QC, final assembly, testing, and trimming. The facility also has an engine tear-down line for re-use parts. During the walk-through of the facility, the inspection team first observed various machining using CNC-machines is performed in Department 76 (Head-line). Spent coolant from this area is pumped to the Prochem treatment unit. The crankshaft production area uses blanks and re-build raw material, and there is no discharge from this area. Mop water from throughout the facility is collected in buckets and poured into a stationary sump and then pumped to the Prochem treatment area.					
7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): The facility has a chemical storage area that is locked and bermed for bulk storage of chemicals. The Inspection Team also observed chemicals stored in satellite areas throughout the facility on secondary containment near the production areas in which they would be used.					
Any floor drains?		Yes	Any spill control measures?		Yes; secondary containment and spill kits
8. Are hazardous wastes drummed and labeled? Hazardous waste is stored in 55-gallon drums in a locked and bermed area. Hazardous waste on site at the time of the site visit included three drums of waste paint solids. Each drum had the proper labeling.					
9. Does the IU have hazardous waste manifests? Yes.					
10. Solid waste production and disposal: Scrap aluminum is hauled off-site by Staman's Trucking Company for recycling.					
11. Description of sample location and methods: Samples are collected from the discharge of the holding tank at the end of the treatment process by Phoenix Wastewater. Samples are sent to Pace Analytical for analysis.					
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: Arxada					
Address of industry: 3500 Trenton Avenue, Williamsport, PA 17701					
Date of visit: 3/20/2024			Time of visit: 9:20 AM – 1:10 PM		
Name of inspectors: Wendy Walter and Drew Zimmerman (WSA) Yatasha Moore (Eastern Research Group) James Kline and Edward Simas (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Andrea Kuntz		EHS Manager			
Lance Trafford		Utility Engineer			
IU Permit Number: W-1		Exp. Date: April 30, 2024		IU Classification: CIU subject to 40 CFR Parts 414 and 455	
Please provide the following documentation:					
1. Nature of operation: The facility manufactures intermediates for various products. Products produced onsite in the hydantoin process include acrawax powder (used in gear manufacturing), food-grade preservatives, lubricants, foaming agents in cosmetics, and intermediates for pesticides. Products produced in the fatty acid derivative (FAD) process are biological agents used in other products such as Lysol and Chlorox wipes.					
2. Number of employees:	142	Number of shifts:	3	Hours of operation:	24 hrs/day; 7 days/week
3. Wastestream flow(s) discharged to the POTW: The IU treats wastewater from truck washing and cleaning the hydantoin and (FAD) process areas.					
Sanitary:	Not provided	Process:	Not provided	Combined:	125,000 gpd (based on 2022 permit application)
4. Describe any significant changes in process or flow: According to the IU representatives, the IU is in the process of upgrading the wastewater treatment system.					

5. Type of pretreatment system (Describe): Wastewater from the facility's hydantoin process is collected in trench drains and flows to a hydantoin waste box. There is an isolation valve located inside the waste box that can be used to divert wastewater as needed. As wastewater flows out of the waste box, sodium hydroxide and sodium bisulfite are added. Wastewater flows to two lagoon cells that have a total retention time of 30-45 days. Wastewater then flows to a holding tank before being transferred to an air stripper to remove tri-halomethanes. Treated wastewater is then discharged through Outfall 1B.

Wastewater from the FAD process is collected in trench drains and gravity flows to the fat box. The fat box serves as an isolation point that allows the SIU to divert wastewater as needed. Wastewater is pumped from the fat box to two heated fat tanks where the fat is removed. Water from the fat tanks flows through a rotary strainer to remove solids. Wastewater is then pumped to one of four day-tanks. The day tanks are used to feed two treatment tanks which have a sequencing batch reactor design. Polymer is added to the treatment tanks as needed. The tanks are decanted to the east basin before being discharged through Outfall 1A.

Discharge Outfalls 1A and 1B mix in a sump with the facility's sanitary waste at Outfall 1.

X	Continuous flow		Batch		Combined
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6. Process area description (identify raw materials and processes used)
The facility receives raw materials via rail, including tallow, palm oil, sunflower oil, 50% sodium hydroxide, chlorine, and ethylene oxide. Other raw materials are delivered via truck in various quantities. Production employees off-load materials into the warehouse and tank storage areas. Products are transferred from the storage areas into the production process via pipe. Depending on the product being produced, the raw materials are weighed and mixed with appropriate reagents. If needed, products are filter pressed with diatomaceous earth and filter paper. The final products are packaged in pails, drums, and totes. Occasionally, the facility packages products in bulk loads.

7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored):
Chemicals are stored in 55-gallon drums, totes, and tanks throughout the property. Except as noted in Finding 1 below, chemicals were stored in secondary containment.

Any floor drains?	Yes, trench drains throughout the facility	Any spill control measures?	Yes; secondary containment and spill kits
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8. Are hazardous wastes drummed and labeled? See Finding 2 below.

9. Does the IU have hazardous waste manifests? Hazardous waste produced by the SIU includes lab waste, amine mix waste, quaternary ammonia compound waste, out of specification materials, and expired materials. The Inspection Team reviewed the most recent hazardous waste manifests.

10. Solid waste production and disposal: The SIU disposes of solid waste via the landfill. Solid waste produced by the facility includes fat removed from the fat tanks, solids from the wastewater treatment system, and filter paper from the production filter press.

11. Description of sample location and methods: The SIU collects composite samples at each of the outfalls. Samples are sent to Pace Analytical for analysis.

Notes:

1. Finding – The Inspection Team observed chemicals without secondary containment.

The Inspection Team observed a drum of various materials (a combination of liquid, fats, and solids) without secondary containment in the ethylene oxide production area (see Photograph 4 in Attachment B). The Inspection Team also observed drums of sodium hydroxide not fully on secondary containment in this same production building (see Photograph 5 in Attachment B). Additionally, the Inspection Team observed residual waste for incineration stored outside without secondary containment in an area that drains to a production trench drain.

2. Finding – The Inspection Team observed totes labeled as hazardous waste without secondary containment.

The Inspection Team observed approximately 45 totes with hazardous waste labels stored outside in an area that drains to the facility's trench drain system (see Photograph 6 in Attachment B). According to the facility representative, the totes did not contain hazardous waste and were improperly labeled.

3. Finding – The Inspection Team observed a sink without signage in the lab.

The Inspection Team observed a sink in the lab. According to the facility representatives, the sink discharges to sewer through the SIU's sanitary connection, and the sink lab is used to for washing dishes and handwashing. There was no signage above the sink stating that chemicals should not be disposed down the sink (see Photograph 7 in Attachment B).

4. Finding – The pH calibration records did not document calibration across the full range of potential pH readings.

The SIU documents weekly calibration of its pH meter using pH 4 and 7 buffer solutions. The facility representatives provided job tickets that document the procedures that employees are expected to follow when conducting pH calibrations. Additionally, the job tickets allow the employees to initial and document each step as being completed. However, none of the job tickets reviewed by the Inspection Team included documentation of pH 10 buffer solution being used. Additionally, the Inspection Team observed only pH 4 and 7 buffer solutions at the pH meter. However, the SIU's pH meter reading was 9.37 at the time of the site visit. Calibration of pH meters should be performed in such a manner as to bracket typical pH values observed in normal operation monitoring events.

Attachment B

Industrial User Site Visit Photo Log



Photograph 1: Sink without no chemical disposal sign in truck desk lab at Eureka Resources.



Photograph 2: Open bucket of waste oil samples in the lab area at Eureka Resources.



Photograph 3: Water inside containment area around methanol treatment column at Eureka Resources.



Photograph 4: Drum of various materials (a combination of liquid, fats, and solids) without secondary containment in the ethylene oxide production area at Arxada.



Photograph 5: Sodium hydroxide stored partially on secondary containment at Arxada.



Photograph 6: Totes with hazardous waste labels at Arxada.



Photograph 7: Sink without no chemicals down drain sign in lab at Arxada.