



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 07/27/2021
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial User Inspection
Site/Facility Name: Bonney Forge Corporation

Site/Facility Address: 14496 Croghan Pike
Mt. Union, PA 17066

Latitude: 40.36394 **Longitude:** -77.86467

County/Parish: Huntingdon County

Permit Number: PAP120214

NAICS Code: 333517 **SIC:** 3541

Unique Project #: 3E21RC036A

Site/Facility Representative(s): Matt Grace, Safety Coordinator **Point of Contact** ☒

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Jim Kline

9/23/2021

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Date

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Date

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I. Introduction

On July 27, 2021, the United States Environmental Protection Agency, Region III (“EPA”), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an onsite Industrial User Pre-Treatment Inspection at the Bonney Forge Corporation (hereinafter, “the Facility”). The Facility is located at 14496 Croghan Pike in Mt. Union, Huntingdon County, Pennsylvania (**See Attachment #1- Photo #1**). The purpose of the inspection was to observe compliance with the Pre-Treatment Regulations of the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The EPA is the control authority for the Facility. The U.S. EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). The PADEP did not have a representative present for the inspection. Due to the ongoing pandemic, Inspector Kline provided the Facility with advance notification of the inspection.

A. Opening Conference

Inspector Kline arrived at the Facility on Tuesday, July 27, 2021 at 10:00AM, and presented his credentials to Mr Matt Grace, Safety Coordinator. Mr. Grace introduced Inspector Kline to Ms. Heather McClure, Vice President. Inspector Kline conducted an opening conference. Attending were Mr. Grace and Ms. McClure. Inspector Kline explained the purpose and scope of the inspection to both Mr. Grace and Ms. McClure.

Inspector Kline requested that any information that the Facility 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.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with ninety (90) degrees Fahrenheit.

II. Facility Activity

The Facility is a manufacturer of industrial forged steel valves, fittings, unions, and branch connections. Current operations are conducted during two shifts from 6:45AM until 11PM. The Facility has 220 full-time employees. According to Mr. Grace, there are three other manufacturing locations in Houston, Italy, and China.

Inspector Kline asked Mr. Grace to describe the Facility Pretreatment Program. Mr. Grace provided Inspector Kline with a simplified process diagram (**See Attachment #2**). Mr. Grace stated the pretreatment process is associated to the Wash Line. Specifically, Mr. Grace stated the

pretreatment consists of a filter press, reclamation tank and evaporator. Water from the evaporator is collected in a three-thousand gallon holding water tank. Mr. Grace stated samples are collected from this tank weekly and analyzed by a contracted third party. Once the analytical report is received and all parameters are within compliance, then the contents are discharged to the wastewater treatment plant. Inspector Kline asked if there had been any exceedances. Mr. Grace stated the most recent exceedance was in 2018 for zinc. Mr. Grace stated the pressed sludges are tested every five years for any hazardous constituents. Mr. Grace said the sludges are non-hazardous and disposed at a local landfill.

III. Observations

Mr. Grace escorted Inspector Kline on a tour of the Facility. Inspector Kline requested to first tour the Pretreatment System. Inspector Kline observed the filter press and sludge hopper. Inspector Kline observed the sludge hopper being filled to approximately eighty to ninety percent capacity (**See Attachment #1- Photo #2**). With the upper most visible portion being liquid, Inspector Kline asked Mr. Grace if the filter press was properly working. The filter press was not on during the inspection. Mr. Grace introduced Inspector Kline to Mr. Randy Ritchey, Maintenance Worker and Mr. Don Morrow, Lead Supervisor. Mr. Ritchey said they had been getting more water from the press and believed that there might be an issue with the fabric used in the press. While Inspector Kline interviewed Mr. Ritchey, the press unexpectedly turned on. Liquids from the press splashed into the hopper. Some of the liquid splashed from the hopper to the floor (**See Attachment #1- Photo #3**). Inspector Kline observed a floor drain located adjacent to the sludge hopper (**See Attachment #1- Photo #4**). Inspector Kline did not observe any inlet protection, or measures taken to prevent liquids from entering the inlet. While conducting the inspection, Inspector Kline did not observe any liquid enter the inlet. Inspector Kline asked Mr. Grace where the inlet ran. Mr. Grace confirmed that the drain runs directly to the POTW.

Inspector Kline was escorted to the 3,000-gallon Holding Tank (**See Attachment #1- Photo #5**). According to Mr. Grace, this is where all samples are collected. Mr. Grace stated he uses the attached red hose for grab samples. Inspector Kline did not observe any signage indicating sample location.

Following the Pretreatment Area tour, Inspector Kline was escorted to the Heat Treat Area. Inspector Kline observed a 55-gallon blue poly drum that was positioned on its side along with three other drums that according to Mr. Grace contained unused product (**See Attachment #1- Photo #6**). Inspector Kline asked Mr. Grace if there was containment used to catch any drips or inadvertent spills while filling containers from the drum. Mr. Grace stated they didn't have any. Inspector Kline did observe staining on the floor that did not appear recent.

Inspector Kline was escorted to the Maintenance Wash Area. Inspector Kline observed what appeared to be oil spilled all over the floor (**See Attachment #1- Photo #7**). Mr. Grace contacted Mr. John Cutshall, Maintenance Supervisor to come to the Maintenance Wash Area. Mr. Cutshall was introduced to Inspector Kline by Mr. Grace. Mr. Cutshall stated the housekeeping was terrible and the area would be cleaned up immediately. Inspector Kline observed a small containment pan that was positioned underneath the valve of a black 55-gallon oil drum. The pan was completely full of what appeared to be oil (**See Attachment #1- Photo #8**). Inspector Kline also observed a 275-gallon tote in the Maintenance Wash Area. There was not containment underneath the valve of the tote. The floor near the tote was also covered in oil (**See Attachment #1- Photo #9**). Inspector Kline observed a floor drain in the Maintenance Wash Area. According to Mr. Grace, The floor drain is to a blind collection sump and does not connect to the POTW.

IV. Records Review

Inspector Kline requested to review analytical reports and documents from the weekly sampling events. Inspector Kline did not observe any exceedances. Mr. Grace stated the last exceedance was for zinc and that occurred in 2018 and was reported to the EPA. Mr. Grace stated the Facility is current with semi-annual reporting to the EPA.

Inspector Kline completed the Industrial User Checklist with input from Mr. Grace (**See Attachment #3**).

V. Closing Conference

Inspector Kline conducted a closing conference with Mr. Grace and Ms. McClure. Inspector Kline shared preliminary observations about the Facility. Inspector Kline reiterated to both Mr. Grace and Ms. McClure that all the preliminary observations discussed were not compliance determinations. Any and 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.

VI. Follow-up Communications

Inspector Kline received an e-mail from Mr. Matt Grace on 7/30/2021. In the e-mail, Mr. Grace attached two photos of actions taken as a result of the inspection, namely the cleanup of the Maintenance Wash Area (**See Attachment #1- Photo #10**) and the new practice of placing containment pigs around the perimeter of the drain inlet near the filter press sludge hopper (**See Attachment #1- Photo #11**).

VII. List of Attachments

Attachment 1: Photos

Attachment 2: Pretreatment Flow Diagram

Attachment 3: IU Checklist