

Washington-East Washington Joint Authority (PA0026212)
Pretreatment Compliance Inspection



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): July 31 – August 1, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: Washington-East Washington Joint Authority
Facility Address: 2 Wilson Avenue, Washington, PA 15301
Facility Latitude: 40.18192
Facility Longitude: -80.24833
County/Parish: Washington County
Permit No: PA0026212
NAICS Code: 221320
SIC: 4952
DSB ID: ECAD-440

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(List of additional attendees in Table 1)

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Date

DSB ID: ECAD-440

Washington-East Washington Joint Authority (PA0026212)
Pretreatment Compliance Inspection
Enforcement and Compliance Assurance Division

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

I. Inspection Summary

Upon arrival at the Washington-East Washington Joint Authority (WEWJA or Facility), EPA contractors Chuck Durham and Yatasha Moore, and United States Environmental Protection Agency (EPA) Region 3 representatives Allison Gieda and Erin DeSandro (jointly referred to as the Inspection Team), met with the Facility representatives. See Table 1 below for a full list of attendees. The Facility owns and operates the Washington-East Washington Sewage Treatment Plant (STP). 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 warm and sunny throughout the week during the inspection.

Table 1: Additional Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Allison Gieda	Environmental Protection Agency	(304) 234-0232	Gieda.Allison@epa.gov
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Site/Facility Representatives			
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Michael Sherrieb	Operations Manager – WEWJA	(878) 212-3643	MSherrieb@wewja.org
Brian McKnight	Plant Superintendent – WEWJA	(724) 222-5490	Plantsuper@wewja.com
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:

- Dynamet Incorporated (non-categorical significant industrial user [SIU])¹
- SMG Circuit Corporation (categorical industrial user [CIU] subject to Title 40 of the *Code of Federal Regulations* [40 CFR] Part 433.17 Metal Finishing Point Source Category, Pretreatment Standards for New Sources)

As part of the inspection, the Inspection Team also conducted site visits at Dynamet and SMG. 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 EPA’s CBI procedures.

The last EPA Region 3 review of the Facility’s pretreatment program was a Field Audit performed in 2015.

¹ At the time of the inspection, Dynamet was permitted as a non-categorical SIU. However, based on the Inspection Team’s observations, the industrial user is subject to the categorical standards in 40 CFR 471 (Nonferrous Metals Forming and Metal Powders Point Source Category), Subpart F (Titanium Forming Subcategory).

II. Program Description

The Washington-East Washington STP has a design capacity of 24 million gallons per day (MGD) with an average flow of 9.77 MGD. The Washington-East Washington STP provides secondary treatment with trickling filters and nitrification. The Facility was in the planning stages for an upgrade to the STP in order to meet permit limits for cyanide and disinfection byproducts. According to the Facility representatives, the STP has had trouble meeting limits for these parameters due to using chlorine for disinfection.

According to the Facility representatives, WEWJA accepts wastewater from the City of Washington and the Borough of East Washington. WEWJA also accepts wastewater from portions of Cannon Township, Amwel Township, Chartiers Township, North Franklin Township, and South Strabane Township. WEWJA owns and operates the collection system in all contributing jurisdictions.

III. Industrial User (IU) Characterization

IUs currently identified by the Control Authority (CA)	IU Type
3	Discharging Significant Industrial Users
	2 Discharging Non-Categorical SIUs (as defined by the CA)
	1 Categorical Industrial Users (CIUs)
	0 Middle Tier CIUs
0	Zero-Discharging CIUs
0	Non-significant CIU (NSCIU)
1	Other Regulated IUs (e.g., permitted IUs) Describe: WEWJA issued Bellden a one-time discharge permit for their annual washout. The IU discharged less than 1,000 gallons.
0	Waste Haulers Describe: Not applicable (N/A). The Facility does not accept hauled waste.

IV. Findings Summary Table

Finding A.1 – The Facility has not submitted a local limits evaluation to EPA Region 3 since 2008.
Finding B.1 – The Facility does not have procedures for identifying all SIUs.
Finding C.1 – The SIUs have been operating without valid discharge permits.
Finding C.4.a – The permits reviewed did not clearly specify the sample location.
Finding C.4.b – The permits reviewed did not contain reporting requirements for violations detected during self-monitoring that are consistent with the federal regulations.
Finding C.4.c – The SMG permit does not specify that composite samples shall be collected as flow-proportional composite samples.
Finding C.4.d – The SMG permit did not require the CIU to notify the Facility of upsets.
Finding C.4.e – The SMG permit did not specify the monitoring requirements for the categorical parameter total toxic organics (TTO).
Finding C.4.f – The SMG permit did not include slug discharge control plan (SDCP) requirements.

IV. Findings Summary Table

Finding C.4.g – 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.h – The permits reviewed did not require notification of bypasses.
Finding D.1 – The Facility failed to apply categorical standards to Dynamet’s discharge.
Finding D.2 – The Facility has not documented slug discharge control plan evaluations at each SIU.
Finding E.1.a – The Facility did not monitor SMG for TTO, as required by the applicable federal regulation (40 CFR 433.17).
Finding E.1.b – The Facility did not have documentation of annual inspections performed at each SIU for each year evaluated.
Finding E.2.a – The Facility was not conducting independent compliance monitoring at SMG.
Finding E.2.b – The Facility was not using the appropriate sample types for compliance monitoring.
Finding E.7 – SMG has not been performing self-monitoring for TTO at least once every six months.
Finding E.9 – The SMG self-monitoring reports did not include the required certification statement.
Finding F.1 – The Facility failed to implement an Enforcement Response Plan (ERP).
SMG Site Visit Data Sheet – SMG representatives were unsure of the correct sample location

V. Evaluation

The Inspection Team discussed the topics in Subsections A-G 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.

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's Rules and Regulations were last updated in 2016, and the Facility's Enforcement Response Plan (ERP) was revised in 2019.

Finding A.1 – The Facility has not submitted a local limits evaluation to EPA Region 3 since 2008.

According to the Facility representatives, the Facility last revised its local limits in 2008. A headworks analysis was conducted in 2015, but the Facility did not revise local limits based on that analysis. EPA Region 3 requested a local limits evaluation from the Facility in 2019. However, the Facility has not yet submitted this evaluation.

Regulatory Requirement

The federal regulations at 40 CFR 403.5(c)(1) require POTWs with an approved pretreatment program to develop local limits and enforce local limits. "Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits."

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, WEWJA accepts wastewater from the City of Washington and the Borough of East Washington. WEWJA also accepts wastewater from portions of Cannon Township, Amwell Township, Chartiers Township, North Franklin Township, and South Strabane Township. The Facility has agreements with all contributing jurisdictions, and the Facility is responsible for conducting all pretreatment activities in the contributing jurisdictions.

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))

Finding B.1 – The Facility does not have procedures for identifying all SIUs.

The Facility representatives stated that new buildings must receive a certification for sewage capacity prior to discharge and the WEWJA staff review those applications. Contributing jurisdictions notify the Facility of new water customers and changes to water customer accounts. However, the Facility does not have procedures for identifying changes at existing industrial users. Additionally, the Facility representatives were unable to determine the last time an Industrial Waste Survey (IWS) was conducted.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(i) require the Facility to “identity and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program.”

- 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))**

Finding C.1 – The SIUs have been operating without valid discharge permits.

All SIUs whose files were reviewed during the inspection had been issued an individual permit but all SIU permits were expired. The SMG permit expired in 2015, and the Dynamet permit expired in 2020. According to the Facility representatives, the permits have been administratively extended every year, but the Facility did not have documentation of these permit extensions. Furthermore, SIU permits cannot be in effect longer than five years for the original effective date of the permit.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii) require the Facility to “control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements.”

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B) state permits must contain a “statement of duration (in no case more than five years).”

- 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
 - 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 did not clearly specify the sample location.

The SMG permit is missing a description of the sampling location. Part 2.A. of the SMG permit states “All samples shall be taken from:”, but then doesn’t describe where the samples shall be collected. The federal regulations require SIU permits to include a detailed description of the sample location in order to ensure that samples are collected from the correct location.

The most recently issued Dynamet permit did not include the attachment with the sampling location description. The Inspection Team located a copy of this attachment with the original permit that was issued in 1999.

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, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type.”

Finding C.4.b – The permits reviewed did not contain reporting requirements for violations detected during self-monitoring that are consistent with the federal regulations.

The SMG and Dynamet permits contain conflicting reporting requirements. Part 2.B.4 of the permits requires the SIUs to notify the Facility “IMMEDIATELY” of violations detected during self-monitoring. Part 3.B. requires written notification within five working days and submittal of a repeat sample result within 30 days.

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 403.12(h) state, “If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation.”

Finding C.4.c – The SMG permit does not specify that composite samples shall be collected as flow-proportional composite samples.

The SMG permit requires that composite samples be collected for certain parameters but does not specify that these samples should be collected as flow-proportional composites.

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 403.12(g)(3) states “Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities.”

Finding C.4.d – The SMG permit did not require the CIU to notify the Facility 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.e – The SMG permit did not specify the monitoring requirements for the categorical parameter total toxic organics (TTO).

The permit for SMG, a metal finishing CIU, does not specify the monitoring frequency for TTO. Additionally, the permit does not provide the option for the CIU to implement a Toxic Organic Management Plan and submit certification statements in lieu of self-monitoring for TTO. The SMG permit should specify the monitoring frequency for all parameters. If the Facility allows the CIU to submit certification statements in lieu of monitoring for TTO in the future, this option must be included in the permit.

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 403.12(e)(1) require CIUs to submit “a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards.”

The federal regulations at 40 CFR 433.12(a) state that the Facility may allow the CIU to submit a certification statement in lieu of monitoring for TTO. Additionally, 40 CFR 433.12(b) states “In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority (or, in the case of indirect dischargers, the control authority) the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater.”

Finding C.4.f – The SMG permit did not include slug discharge control plan (SDCP) requirements.

SMG submitted a SDCP to the Facility in 2008. However, the permit did not include a requirement for the SIU to develop and submit a SDCP.

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 regulation at 40 CFR 403.8(f)(1)(iii)(B)(6) require permits to contain “requirements to control Slug Discharge, if determined by the POTW to be necessary.”

Finding C.4.g – 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 regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require that permits include conditions, such as reporting and notification requirements.

The federal regulations at 40 CFR 403.8(f)(2)(vi) require SIUs to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge.

Finding C.4.h – The permits reviewed did not require notification of bypasses.

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 403.17 require industrial users to notify the Facility of bypasses.

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))

As noted in Finding C.4.e above, the Facility has not applied the correct monitoring requirements for the 40 CFR 433.17-regulated parameter TTO.

Finding D.1 – The Facility failed to apply categorical standards to Dynamet’s discharge.

The most recent Dynamet permit (issued in 2015) classifies the industrial user as a non-categorical SIU. Based on the Inspection Team’s observations during the site visit at Dynamet, the industry performs rolling and drawing of Titanium and should be classified as a CIU subject to 40 CFR 471 (Nonferrous Metals Forming and Metal Powders Point Source Category), Subpart F (Titanium Forming Subcategory).

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(ii) requires the Facility to “require compliance with applicable Pretreatment Standards and Requirements by Industrial Users.” In addition, 40 CFR 403.8(f)(2)(iii) requires control authorities to notify industrial users of applicable pretreatment

standards and requirements.

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

Finding D.2 – The Facility has not documented slug discharge control plan evaluations at each SIU.

According to the Facility representatives, the previous WEWJA staff may have evaluated each SIU for the need to develop a slug discharge control plan. However, the Facility representatives were unable to locate these evaluations at the time of the inspection.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(vi) require the Facility to “evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User.”

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, except as noted below. The Facility did not have any CIUs designated as middle tier CIUs and had not issued waivers for pollutants not present. These are optional provisions in the federal pretreatment regulations and cannot currently be implemented in Pennsylvania until the state adopts them into state regulation.

Finding E.1.a – The Facility did not monitor SMG for TTO, as required by the applicable federal regulation (40 CFR 433.17).

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) require the Facility to “randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards.”

The federal regulations at 40 CFR 433.17 require compliance with a daily maximum pretreatment standard for TTO. As noted in Finding C.4.e above, the SMG permit contains the correct discharge limit for TTO but does not specify a monitoring frequency.

Finding E.1.b – The Facility did not have documentation of annual inspections performed at

each SIU for each year evaluated.

The Facility could not locate documentation of an inspection at SMG in 2021.

The Facility did not maintain documentation of inspections conducted at Dynamet after 2019. According to the Facility representatives, Facility staff document any changes noted during the inspection. However, an inspection form was not completed because no changes were identified since 2019.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) require the Facility to “inspect and sample the effluent from each Significant Industrial User at least once a year.”

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))

Except as noted below, according to the information reviewed during the inspection, the Facility uses proper sampling, analysis, and inspection procedures.

Finding E.2.a – The Facility was not conducting independent compliance monitoring at SMG.

The Facility allows SMG’s representatives to set up and program the composite sampler used for compliance monitoring. In order for compliance monitoring to be considered independent monitoring, the Facility personnel should set up and program the composite sampler and maintain control of the sampler for the Facility’s compliance monitoring.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) require the Facility to “randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards.”

Finding E.2.b – The Facility was not using the appropriate sample types for compliance monitoring.

The Facility is collecting time-proportional composite samples at this CIU. However, there was no documentation that time-proportional composite samples are representative of SMG’s discharge in the Facility’s files.

Regulatory Requirement

The federal regulations at 40 CFR 403.12(g)(3) states “Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control

Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities.”

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, receiving, and analyzing required reports.

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 conducted re-sampling 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))

Except as noted below, the Facility has ensured that CIUs have reported on regulated pollutants at

least once every six months.

Finding E.7 – SMG has not been performing self-monitoring for TTO at least once every six months.

Based on the files reviewed by the Inspection Team, SMG had not conducted self-monitoring for the categorical parameter TTO during the period of review, 2022 - 2024. The CIU was submitting certification statements in lieu of monitoring. However, these certification statements did not contain the correct language in 40 CFR 433.12(a). Additionally, the SMG permit did not include the option for SMG to submit certification statements in lieu of monitoring for TTO.

Regulatory Requirement

The federal regulations at 40 CFR 403.12(e)(1) require CIUs to “submit to the Control Authority during the months of June and December, unless required more frequently in the Pretreatment Standard or by the Control Authority or the Approval Authority, a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards.”

The federal regulation at 40 CFR 403.12(g)(1) require CIU reports to contain “the results of sampling and analysis of the Discharge, including the flow and the nature and concentration, or production and mass where requested by the Control Authority, of pollutants contained therein which are limited by the applicable Pretreatment Standards.”

The federal regulations at 40 CFR 433.12(a) states that the Facility may allow the CIU to submit a certification statement in lieu of monitoring for TTO. Additionally, 40 CFR 433.12(b) states “In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority (or, in the case of indirect dischargers, the control authority) the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater.”

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 files 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(l))

Finding E.9 – The SMG self-monitoring reports did not include the required certification statement.

The SMG self-monitoring reports were signed by an authorized representative of the CIU. However, the certification statement on the reports did not contain language that is consistent with the federal

requirements.

Regulatory Requirement

The federal regulations at 40 CFR 403.12(l) require self-monitoring reports from CIUs to contain the certification statement located in 40 CFR 403.6(a)(2)(ii).

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))

Finding F.1 – The Facility failed to implement an Enforcement Response Plan (ERP).

The Facility was unable to determine if the ERP has been adopted. According to the Facility representatives, the Facility had not taken any enforcement actions in 2024. However, as noted in Finding E.9 above, SMG has not been submitting the required certification statements with their self-monitoring reports.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(5) requires the Facility to “develop and implement an enforcement response plan.”

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))

According to the Facility representatives, the Facility evaluates SNC according to the definition in its SUO. The Facility publishes a list of SIUs in SNC in *The Hearld Standard*.

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))

As noted in Finding A.1 above, the Facility’s SUO and ERP may not be in effect. Therefore, the Facility may or may not have 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 file review.

G. Additional Evaluations

1. Dental Mercury Program

According to the Facility representatives, there are 59 dental facilities in the service area. The Facility has received one-time certification statements for new dental facilities that have new connections since 2019. The Facility does not inspect or permit dental facilities.

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

The Facility does not issue permits to food service establishments (FSEs). The Facility requires FSEs to install grease control equipment and the Facility periodically checks equipment for compliance.

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: Dynamet					
Address of industry: 195 Museum Road, Washington, PA 15301					
Date of visit: 8/1/2024			Time of visit: 8:30 am – 11:15 am		
Name of inspectors: Robert Herring, Michael Sherrieb, and Brian McKnight (WEWJA) Chuck Durham (Eastern Research Group) Erin DeSandro (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Jon Hedge		Technology Manager			
Christopher Luksic		Corporate Environmental Program Manager			
IU Permit Number: 15-1		Exp. Date: June 15, 2020		IU Classification: permitted as non-categorical SIU (see Finding D.1 above)	
Please provide the following documentation:					
1. Nature of operation: The facility manufactures titanium bars and steel coils and wires for the aerospace and medical industries.					
2. Number of employees:	~250	Number of shifts:	2	Hours of operation:	24 hours/day, 7 days/week
3. Wastestream flow(s) discharged to the POTW:					
The industrial user generates wastewater from surface prep rinse tanks and acid etch tanks. Wastewater is also generated from cleaning lines.					
Sanitary:	Not provided	Process:	3,500-5,000 gpd	Combined:	Not provided
4. Describe any significant changes in process or flow: None.					
5. Type of pretreatment system (Describe): Wastewater collected in the trench drains around the chemical milling area drains to the waste pit. Wastes from this pit are transferred to Reactor Tank #1 (see Photograph 3) via diaphragm pumps. The pH is raised to 4 standard units (s.u.) and sodium bisulfite is added to reduce the oxygen reduction potential (ORP). Wastewater is then pumped into Reactor Tank #2 where the pH is raised to 9 s.u. and then pumped into Reactor Tank #3 which acts as a holding tank for the microfiltration unit (see Photograph 4). Wastewater is pumped from Reactor Tank #3 through the microfiltration unit (eight 0.1-micron filters) and then to a settling tank (Detention Tank [DT]6). Sludge accumulated by the filtration system goes to the Sludge tank (DT 4-T01) while the effluent is pumped to DT6 prior to discharge to the sewer. Solids from DT 4-T01 and DT6 are pumped to the filter press for dewatering. Filter cake solids from the press are removed off-site by Waste Management. Filtrate from the press is returned to DT6. DT6 is the final holding tank for final pH and flow monitoring is conducted (see Photograph 2).					

X	Continuous flow		Batch		Combined
6. Process area description: The facility receives raw materials in the form of billets and bars. Bars are formed by roll milling and heat treating. Coils are formed by hot working and annealing. <u>Rolling Area:</u> Raw material in the form of blooms and billets are placed in the furnace. Once it reaches the appropriate temperature, the piece is rolled through the Tippin Mill (multiple rollers in series). Contact cooling water in the Rolling Area is recirculated and eventually shipped to a pit for off-site disposal. Parts then go to the intermediate mill (Kocks Mill) and then to the finishing mill. <u>Coil Processing Area:</u> Round stock coil product goes to the wire mill at this point for annealing, drawing, turning, and inspection. The SIU has four drawing machines. Material then goes to the turning stage and is sent to an off-site location for surface preparation, then back to this location for inspection and testing. All contact cooling water from the mill area is pumped to the oil/water separator. Oil is skimmed off and hauled off-site by Safety Kleen. Annually the separator is cleaned, and all of the water is pumped out for off-site disposal. <u>Chemical Milling:</u> The industry's chemical etching process uses a mixture of nitric acid, hydrofluoric acid, and water. The process includes an acid etch followed by reverse osmosis (RO) rinse tank that drains to a trench drain. Any water that flows or spills into the surrounding trench drain flows into the waste pit.					
7. Chemical storage area: The facility was storing titanium, sulfuric acid, hydrofluoric acid, and nitric acid in a designated chemical storage area (see Photograph 1). Wastewater chemicals stored onsite, in the treatment area, include sodium bisulfate, sulfuric acid, sodium hydroxide, and ferric chloride polymer.					
Any floor drains?	Floor drains in chemical milling area, not chemical storage	Any spill control measures?	Spill kits, secondary containment pallets		
8. Are hazardous wastes drummed and labeled? US Ecology removes cooling water sludge.					
9. Does the IU have hazardous waste manifests? The Inspection Team reviewed the most recent hazardous waste manifest.					
10. Solid waste production and disposal: Solids from the treatment system are removed by Waste Management.					
11. Description of sample location and methods: The facility's contract laboratory, ETL, collects grab and composite samples out of DT6.					
Notes:					

During the exit interview, the inspection team requested copies of the sludge disposal manifest and the most recent hazardous waste manifest, as well as pictures taken by the facility representative during the walk-through. The facility provided these documents via email on September 13, 2024. The Inspection Team reviewed the documents and did not have any additional concerns.

The inspection team also discussed the classification question with the permittee advising that a categorical determination would be made as part of the PCI process (see Finding D.1). The Facility would then contact SIU personnel to discuss any changes that result from that categorical determination.

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: SMG Circuit Corporation					
Address of industry: 120 Stationvue Lane, Building #2, Washington, PA 15301					
Date of visit: 7/31/2024			Time of visit: 1:30 pm – 3:25 pm		
Name of inspectors: Robert Herring, Michael Sherrieb, and Brian McKnight, Lee Grillus (WEWJA) Yatasha Moore (Eastern Research Group) Allison Gieda (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Chuck Sutaria		Owner			
Sam Guolakiya		Shop Manager			
IU Permit Number: 13-4		Exp. Date: June 15, 2015		IU Classification: CIU subject to 40 CFR 433.17	
Please provide the following documentation:					
1. Nature of operation: The facility manufactures printed circuit boards.					
2. Number of employees:	30	Number of shifts:	1	Hours of operation:	7:00 am – 7:00 pm, Monday - Thursday
3. Wastestream flow(s) discharged to the POTW:					
The SIU generates wastewater from the plating and developing operations.					
Sanitary:	Not provided	Process:	Not provided	Combined:	6,500 MGD
4. Describe any significant changes in process or flow: The facility reduced the number of production days in 2024 due to customer demand. The facility now does production work on Fridays only on an as-needed basis.					
5. Type of pretreatment system (Describe): Wastewater from the production process goes into floor drains and flows to two 2,000-gallon polyethylene tanks for storage. When the facility is ready to run the pretreatment system, wastewater flows through two sets of four columns (in parallel) for ion exchange treatment. The pH is adjusted using sulfuric acid and sodium hydroxide before the treated wastewater is discharged to sewer.					
Solids from the wastewater system are dewatered via the filter press. Liquid from the filter press is returned to the storage tanks at the beginning of the pretreatment system. Solids from the filter press are hauled off-site as hazardous waste.					

☐ Continuous flow	☒ X	☐ Batch	☐ Combined
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6. Process area description:
The facility receives raw material (copper clad laminate material) and stores it on racks. Panels of copper laminate are drilled with prep holes and coated with graphite to prepare the panels for copper plating. A film is placed on the panels and a pattern is printed on the panels. Panels then go through the developing machine before being copper plated.

The facility's copper plating line consists of the following tanks:

- Water
- City water
- Sulfuric acid prep
- Three copper tanks
- Water
- Sulfuric acid
- City water
- Tin

After the copper plating line, panels go to the etching line.

After the etching line, panels are spray coated with color and then coated with a special developer to re-expose the copper. Panels are then printed with white labels before finishing with solder, lead-free solder, gold solder, and silver.

7. Chemical storage area:
Replenisher (a chemical used to remove copper) was stored in 55-gallon drums on spill pallets in the copper plating area. Wastewater treatment chemicals were stored in 55-gallon drums in a chemical storage area near the wastewater treatment area (see Photograph 6). Paints were stored in various sizes in the spray coating area (see Photograph 5).

Any floor drains?	Yes	Any spill control measures?	Yes; secondary containment
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8. Are hazardous wastes drummed and labeled? Solids from the pretreatment system are hauled off-site by US Waste. The Inspection Team observed that hazardous waste was drummed and labeled.

9. Does the IU have hazardous waste manifests? Yes. The Inspection Team reviewed the most recent hazardous waste manifest dated June 11, 2024.

10. Solid waste production and disposal: Waste from cutting the laminate panels is sold as scrap metal to the highest bidder.

11. Description of sample location and methods: The facility's contract laboratory, Geochemical, collects and analyzes samples.

Notes:

1. Finding – SMG representatives were unsure of the appropriate sample location.

During the site visit, SMG representatives stated that self-monitoring samples were collected from a discharge pipe in the etching area (see Photograph 7). According to the SMG representatives, this pipe leaves the wastewater treatment area and discharges to the sewer on the other end of the building. However, the SMG representatives could not state when they verified that no other wastewater combines with this line after the sampling point and prior to combining with the SIU's sanitary discharge.

Attachment B

Industrial User Site Visit Photo Log



Photograph 1: Chemical storage at Dynamet. Photo provided by the Dynamet representative following the inspection.



Photograph 2: Final pH and flow monitoring tank at Dynamet. Photo provided by the Dynamet representative following the inspection.



Photograph 3: Reactor 1 mix tank at Dynamet. Photo provided by the Dynamet representative following the inspection.



Photograph 4: Reactor 3 holding tank – microfilter feed tank at Dynamet. Photo provided by the Dynamet representative following the inspection.



Photograph 5: Various paints stored in the spray coating room at SMG.



Photograph 6: Chemical storage at SMG.



Photograph 7: Grab sample location at SMG. Arrow is pointing to the pipe where samples are collected (circled).