



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): 07/19/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pre-Treatment – POTW Inspection
Site/Facility Name: Sunbury Wastewater Treatment Plant
Permittee(s): Sunbury Wastewater Treatment Plant
Site/Facility Operator: Sunbury Municipal Authority
Site/Facility Address: 462 South 4th Street
Sunbury, PA 17801
Latitude: 40.85462 **Longitude:** -76.79459
County/Parish: Northumberland County
Permit Number: PAL026557
NAICS Code: 22132 **SIC:** 4952
Unique Project #: 3E22WN019A

Site/Facility Representative(s): **Point of Contact**
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Sunbury IPP Manager

Zach Zechman,
Wastewater Technician

EPA Inspector:
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EPA Inspector

Report Preparer	Garth Connor, ESS (ED13)	Date
Signature/Date	EPA Region 3 – Philadelphia, PA 19103	

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I. Introduction

On July 19, 2022, Garth Connor, an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III Office in Philadelphia, Pennsylvania, conducted an onsite Pre-Treatment Inspection at the Sunbury Wastewater Treatment Plant facility (hereinafter, “Sunbury”, “the Facility”. This Facility is located at 462 South 4th Street in Sunbury, Northumberland County, Pennsylvania. Sunbury operates a wastewater treatment plant for the residents in that community, and it also has a pre-treatment program for its industrial users. The Facility discharges its wastewater to the nearby Shamokin Creek, a tributary of the Susquehanna River. Sunbury is located just east of the Susquehanna River. The purpose of the inspection was to observe compliance with the Pre-Treatment regulations of the Clean Water Act (CWA) and to verify their compliance with the applicable industrial user regulations. The Pennsylvania Department of Environmental Protection was invited to the inspection but chose not to attend.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at about 10:00 AM for this onsite inspection and met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspector			
Garth Connor	EPA – Phila. Office	215-814-3209	Connor.garth@epa.gov
Site/Facility Representatives			
Clyde Troutman	Sunbury – Manager of Industrial Pre-Treatment Program	570-286-5858	ctrout@ptd.net
Zach Zechman	Sunbury – Wastewater Technician	570-286-5858	

Garth Connor displayed his inspector credentials to Clyde Troutman at the start of the inspection, and explained that the purpose of the inspection was to observe their compliance with the pre-treatment regulations of the Clean Water Act. The EPA Inspector informed the Sunbury staff that any information that the Facility deemed to be Confidential Business Information (“CBI”) should be identified to the EPA inspector during the inspection and it would be handled as CBI according to EPA’s CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, the weather was mostly sunny with temperatures in the 70’s.

C. Summary of the Site/Facility

Sunbury has an EPA-approved Pre-Treatment program for its industrial users (IUs), and it currently has only three significant IUs. Sunbury had more IUs years ago, but many of those industries have closed their operations in Sunbury and moved elsewhere. The three IUs operating in Sunbury now are Dempsey Uniform and Linen Supply (Dempsey), Weis Meats and, at a separate location, Weis Milk & Cheese (Dairy Plant). Dempsey does industrial laundering of medical uniforms and other linens, and it operates large washers and driers at its plant. Mr. Trout has worked as the Manager of the Industrial Pre-treatment Program at Sunbury for many years, and he is quite familiar with all three of these IUs and their manufacturing operations. The EPA inspector picked Dempsey as the IU to be visited in Sunbury for the second part of this inspection. Mr. Trout informed the EPA inspector that the IUs are all sampled twice a year by Sunbury pre-treatment staff and the IUs are also inspected annually by the POTW staff.

II. Site Activity

During the inspection, the EPA Inspector first discussed the details of the Sunbury's industrial pre-treatment program with Mr. Troutman and Mr. Zack Zechman, a Sunbury wastewater technician, in an Opening Conference at an office in the Sunbury wastewater treatment plant. Mr. Troutman explained to the EPA inspector that he and his staff issue 5-year discharge permits to all three of their IUs. They regularly sample and inspect all three of their industrial users to make certain that they're all operating within their permit limits. See **Attachment #1 - Inspection Photographs** for photographs of the different aspects of the IU inspection. The inspector walked thru the entire Dempsey plant to see the different segments of Dempsey's industrial laundering process. The inspection observations were made pursuant to the requirements of the Pre-Treatment regulations of the Clean Water Act.

III. Observations

The EPA inspector started at the Sunbury wastewater treatment plant with Mr. Troutman and Mr. Zechman. Mr. Troutman explained that Dempsey generates an average about 40,000 gallons of wastewater per day, and the flow is constantly measured by a flow meter operating near the front entrance to the Dempsey plant. **Photograph #1** shows the Sunbury sampling vehicle that is used by the wastewater staff on sampling visits to their IUs. **Photograph #2** shows some of the sampling equipment in the back of the vehicle, including a 24-hour composite sampler. The sampler is calibrated by Sunbury staff prior to each time it's used. The EPA inspector and the Sunbury staff were met by Kyle Jessick, Dempsey's Environmental

Coordinator. **Photograph #3** shows the front portion of the plant and the sign for Dempsey from the street (Edison Avenue). **Photograph #4** shows the wastewater sampling location, called the sampling pit, which is about two feet below ground and is near the front entrance of Dempsey. **Photograph #5** shows the same location with the metal cover removed so that the EPA inspector could observe the wastewater flow heading toward the sewer. The Sunbury sampling device, a 24-hour composite sampler, is placed into this discharge flow during wastewater sampling events. Both Dempsey and the Sunbury POTW staff sample at this exact same location, but they sample there in alternating quarters. **Photograph #6** is the Dempsey storage area located in the rear of the plant for storage of waste oil and other cleaning chemicals. **Photograph #7** is a spill kit within the Dempsey plant just in case of an accidental spill of any chemicals.

IV. Records Review

During this inspection, the EPA Inspector filled out a POTW Pre-Treatment Inspection Checklist, and that document is attached (**Attachment #2 – POTW Inspection Checklist**). He was also given an electronic copy of the Dempsey IU permit which includes all the parameter limits and sampling requirements for the industrial laundry's wastewater discharges (**Attachment #3 – Dempsey IU Permit**). Dempsey does twice a year sampling of its wastewater, and the Sunbury POTW staff also samples there twice a year. The laundry facility is sampled quarterly, a total of four times a year between the two types of sample collection. Sunbury staff sample the Dempsey wastewater in the first and third quarters of each calendar year, Dempsey staff sample in the second and fourth quarters. Sunbury has three significant IUs currently operating and they're all non-categorical industrial users that have been in business in Sunbury for many years. A recent sampling occurred in May, and the results are attached (**Attachment #4 – Recent Sampling Results**). The laboratory analysis of those samples was done offsite by Pace Analytical Laboratories in Williamsport, Pennsylvania. The results of the recent quarterly sampling by Sunbury staff were reviewed by the EPA inspector and show that all of results of the limited parameters are well below Dempsey's permit limits. The EPA inspector also received electronic copies of Sunbury's recent annual inspection of Dempsey in May of 2022 (**Attachment #5 – Sunbury Inspection of Dempsey**).

V. Closing Conference

After the facility inspection at Dempsey, the EPA Inspector met with the Sunbury facility representatives for a closing conference. The EPA Inspector shared preliminary observations with the facility. The EPA Inspector reiterated to the Sunbury staff 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

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report and its attachments that were not identified at the time of the closing conference after EPA reviewed additional materials that were sent following the onsite inspection.

The inspection concluded at approximately 1 PM, and the EPA inspector then left the Facility.

VI. List of Attachments

Attachment #1: Inspection Photographs

Attachment #2: Industrial User's Checklist

Attachment #3: Dempsey's IU Permit

Attachment #4: Sampling Results

Attachment #5: Sunbury Inspection of Dempsey