UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F Kennedy Boulevard
Four Penn Center
Philadelphia, Pennsylvania 19103

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	04/06/2023
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment – Industrial User Inspection
Facility Name:	World Resources Recycling Facility
Permittee(s):	World Resources Company (WRC)
Facility Operator:	World Resources Company (WRC)
Facility Address:	170 Walnut Lane, Pottsville, PA 17901
Lat/Long:	40.6877/-76.23315
County/Parish:	Schuylkill
Permit Number:	PAP127693
NAICS & SIC Codes:	562211/4953
Unique Project #:	3E23WN046A

Facility Representative(s): **Point of Contact**

Dale Schneck – Vice President, Environmental Manager – World Resources Company ☒

Phone: 570-622-4747 Email: dlschneck@wrcusa.com

EPA Inspectors:

Aaron Thomson - EPA Inspector (3ED33)

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AARON THOMSON

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Date

JESSICA DUFFY

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Jessica Duffy, NPDES Section 2 Chief (3ED33)
Four Penn Center
Philadelphia, Pennsylvania 19103

Date

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I. Introduction

On April 6, 2022, Aaron Thomson (hereinafter, “Inspector Thomson”, “EPA Inspector) an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III conducted an on-site inspection of the World Resources Recycling Facility’s (hereinafter, “World Resources”, “the Facility”) pretreatment program. World Resources Recycling Facility recycles EPA listed and characteristic non-ferrous metal bearing hazardous wastes, as well as non-hazardous wastes, by-products, and other industrial residues while also producing metal concentrates. The Facility is located at 170 Walnut Lane, Pottsville, PA and operates under the Environmental Protection Agency (EPA) pretreatment program identification number PAP127693. According to Mr. Shneck, the Facility has a contract with the Minersville Sewer Authority to discharge wastewater via tanker trunk to a POTW with an unapproved program, the Minersville Sewer Authority. 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. Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). PADEP representatives Patrick Musinksi and Kelsey Glavich were present for the inspection. Inspector Thomson provided the facility with advance notification of the inspection.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at est. 11:00 AM for the on-site inspection. Inspector Thomson met with the following facility representatives and PADEP representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA - Philadelphia	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Dale Schneck	Vice President, Environmental Manager – WRC	570-622-4747	dlschneck@wrcusa.com
PADEP Representatives			
Patrick Musinski	PADEP	570-826-2326	pmusinski@pa.gov
Kelsey Glavich	PADEP		kglavich@pa.gov

Inspector Thomson displayed their credentials to Mr. Schneck at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspector informed Mr. Schneck that any information that the Facility 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.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with a high of 74 degrees Fahrenheit.

II. Facility Activity

According to Mr. Schneck, the facility recycles EPA listed and characteristic non-ferrous metal bearing hazardous wastes, as well as non-hazardous wastes, by-products, and other industrial residues. Wastes with metals, such as nickel and copper, are imported, analyzed, dried and the resulting metal concentrates are compounded and packaged to be sold. Mr. Schneck stated that operations occur Monday-Friday, with 8-hour shifts that cover a 24-hour period, and weekends may be worked as needed.

Inspector Thomson asked Mr. Schneck to describe the processes that contribute to the wastewater discharged to the facility. Mr. Scheck provided a process diagram of the related wastewater processes, which included confidential business information and was not included as an attachment in this report. According to Mr. Scheck, the most wastewater comes from their scrubbing system but this waste stream also includes rainwater, washdown water and laboratory water. Rainwater, washdown water and laboratory water are collected in a "process water tank" (hereinafter, "process tank 1") which then leads to either the scrubber tank or the leaching/precipitate tank, controlled by the Facility. As the metal bearing filter cakes are concentrated, a wet exhaust scrubber is used to filter exhaust to the atmosphere, and the associated wastewater is collected in the "scrubber tank" which also receives water from process tank 1. The combined wastewater stream after the scrubber, or wastewater directly from process water tank 1, enters a leaching/precipitate tank where solids are precipitated, and pH is adjusted. The waste stream then enters a second process water tank (hereinafter, "process tank 2") where pH and other permitted limits (if necessary) undergo in-house testing to preliminarily determine compliance before either being sent back to process water tank 1 to undergo the treatment process again or being sent to a clean excess water tank.

According to Mr. Scheck, the Facility operates an accredited lab where they analyze their own solids, wastes, metals and cyanide. Processed wastewater is collected in the clean excess water tank until a full load (5,000gallons) is collected, the wastewater is then sampled (grab sample) and the sample is analyzed with an expected 24-hour turn-around time. The water is held until results are received, to ensure compliance with permitted parameters before being transferred to the tanker truck and discharged to the Minersville POTW. According to the control mechanism provided by EPA (**Attachment 3**), if the Facility treats any waste receipts that contain cyanide at concentration higher than 136 mg/liter, monitoring must be done after CN treatment and before dilution with other wastestreams; if the Facility can demonstrate the capability of achieving the CN limitations after CN treatment and mixing with other wastestreams, monitoring may done at the clean excess water treatment tank effluent stream. Mr. Schneck stated that cyanide is not necessarily tested once per load, but rather if the waste receipts received contain cyanide at a concentration of higher than 136 mg/liter; additionally one cyanide compliance sample is sent to and analyzed by Eurofins, once per month. Simlarly, Mr. Schneck stated that they do not test mercury in house andthey use Eurofin to analyze a monthly composite mercury samplewith a 2 week turn-around time. Mr. Schneck stated that all compliance sample results are included in their bi-annual report to EPA.

Inspector Thomson asked Mr. Schneck to describe the Facility's relationship with the POTW, and to provide a control mechanism issued by local sewer authority, if available. Mr. Schneck stated that the Facility did not have a permit with the local POTW, but instead had a contract to discharge to their facility. Inspector Thomson requested a copy of the contract, which was not provided by the Facility as of writing this report.

Inspector Thomson asked Mr. Schneck to describe the industrial user categorical status of the facility, and Mr. Schneck stated that he was unsure, and it might be "something with metals." Based on observations made on-site and a certification provided by the Facility to EPA dated 1/11/2023 (**Attachment 1**), the facility is classified as a centralized waste treatment point source Categorical Industrial User (CIU). The Facility is subject to the Federal Pretreatment Regulations in 40 CFR Part 403 and Categorical Industrial User Regulations in 40 CFR Part 437 Subpart A. The facility discharges to the Minersville publicly owned treatment works (POTW). Because the facility discharges to a POTW without an approved pretreatment program, EPA is designated as the Control Authority, and as such is the authority for inspections per 40 CFR Part 403.3(f).

III. Observations

Photographs were taken during the inspection by Inspector Thomson. Photographs pertaining to the inspection report are provided in Attachment 1. Not all photographs taken during the inspection are included in this report.

Inspector Thomson conducted a tour of World Resources with Mr. Schneck. Inspector Thomson was escorted throughout the facility. The tour included a walk-through of the process water tanks, filter press, scrubber tank, leaching/precipitate tank, and excess clean water tank; photographs of the aforementioned locations were not taken at the request of Mr. Schneck, due to confidential business information concerns.

Inspector Thomson was next led to the Facility's lab, which included pH buffers of 4-10 (**Attachment 2 - Photographs 1, 2 and 3**) and the lab's accreditation certificate (**Attachment 2 - Photograph 4**). The accreditation was still valid, and buffer solutions were within manufacturer's expiration dates.

Lastly, Inspector Thomson was led to the Facility's discharge sampling point (**Attachment 2 - Photographs 5, 6 and 7**) which is located directly before the Facility's "discharge" point, a fill station where wastewater is transferred into the tanker trucks that will transport wastewater to the local POTW to be discharged.

IV.Records Review

Prior to the inspection, Inspector Thomson requested the following documentation be submitted via email two weeks before the inspection or up to two weeks after the inspection: Control mechanism, categorical status, two years of compliance monitoring reports, slug/spill prevention plan, and process flow diagrams relating to the pretreatment system. During the inspection, Mr. Schneck provided the following information/documents which were reviewed by Inspector Thomson (and were additionally reviewed by state counterparts); control mechanism issued by EPA; compliance monitoring reports from Q1 & Q2 2021, Q3 & Q4 2021, Q1 & Q2 2022 and Q3 & Q4 2022; the preparedness plan (slug/spill prevention plan, QA/QC); EPA methods used by the lab (200.2); sample chain of custody (CoC) form; and process diagrams. Copies of the control mechanism (**Attachment 3**), 2021 Q1 semi-annual report (**Attachment 4**), 2021 Q1&Q2 semi-annual reports (**Attachment 5**), sample CoC (**Attachment 6**), EPA method 200.2 (**Attachment 7**), 2022 Q1 semi-annual reports (**Attachment 9**) and 2022 Q2 semi-annual reports (**Attachment 10**) were provided by the Facility during the inspection. Inspector Thomson did not observe any exceedances or discrepancies. Mr. Schneck stated World Resources is current with semi-annual reporting to the EPA and has not submitted any reports late. Mr. Shneck stated that the Facility has not had any exceedances recently.

During the inspection, Inspector Thomson requested copies of the spill/slug prevention plan, the QA/QC sampling plan and lab analysis results provided by Eurofins for compliance sampling, be sent via email to Inspector Thomson within two weeks of the inspection date, and as of writing this report, have not been received.

Inspector Thomson completed the Industrial User Checklist with input from Mr. Schneck **(Attachment 8)**.

V. Closing Conference

After the facility inspection, the EPA Inspector met with the facility representatives for a closing conference. The EPA Inspector shared preliminary observations with the facility. The EPA Inspector reiterated to the facility representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 2:00 PM

VI.List of Attachments

Attachment 1. Jan 2023 Certification Statement
Attachment 2. Photo Log
Attachment 3. Control Mech EPA April 2006
Attachment 4. Semi Annual 2021 Q1
Attachment 5. Semiannual 2021 Q1 & Q2
Attachment 6. Sample CoC
Attachment 7. EPA Method 200.2
Attachment 8. IU Checklist
Attachment 9. Semi Annual 2022 Q1
Attachment 10. Semi Annual 2022 Q2