



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): September 19-21, 2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Facility Name: City of Allentown Wastewater Treatment Plant
Permittee(s): City of Allentown/Lehigh County Authority
Site/Facility Operator: Lehigh County Authority
Facility Address: 112 West Union Street Allentown, PA 18102
Lat/Long: 40.601667, -75.45333
County/Parish: Lehigh
Permit Number: PA0026000
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN063A

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I. Introduction

On September 19-21, 2023, Inspector Jim Kline (Inspector Kline) from the U.S. Environmental Protection Agency (EPA) Region 3, National Pollutant Discharge Elimination System (NPDES) Section conducted an on-site Pretreatment Compliance Inspection (PCI) of the City of Allentown Wastewater Treatment Plant (hereinafter “Allentown WWTP”) Pretreatment Program. The Allentown WWTP is located at 112 West Union Street Allentown, PA 18102 (**See Attachment #1- Photo #1**). The purpose of the inspection was to observe the Allentown WWTP Pretreatment Program’s compliance with the Clean Water Act (CWA), the applicable Federal Pretreatment Regulations, and the Facility’s National Pollutant Discharge Elimination System (NPDES) permit ID: PA0026000 (**See Attachment #2**). Prior to the PCI, the Pennsylvania Department of the Environment (“PADEP”) was notified of the inspection. The PADEP did not send a representative to attend the PCI. Inspector Kline did provide Allentown WWTP advanced notice of the PCI.

All information included in this report is the result of observations made by Inspector Kline, statements made by Allentown WWTP, LCA and/or Cintas representatives, materials shown to Inspector Kline by Allentown WWTP, LCA and/or Cintas representatives, and/or documents provided by Allentown WWTP, LCA, and/or Cintas representatives to Inspector Kline at the time of, or subsequent to, the inspection.

A. Allentown WWTP - Opening Conference

Inspector Kline arrived at Allentown WWTP at 1:00PM on Tuesday September 19, 2023. Upon arrival, Inspector Kline presented his credentials to Mr. Andrew Moore, Director of Plant Operations. Mr. Brian Chamberlain, Compliance Auditor for the City of Allentown was also present and requested to attend the Opening Conference. Mr. Chamberlain described his role as providing oversight of the lease to the Lehigh County Authority for the Allentown WWTP. Inspector Kline proceeded to conduct an Opening Conference with Mr. Moore and Mr. Chamberlain.

Inspector Kline informed Mr. Moore that any information that Allentown WWTP deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. Inspector Kline informed Mr. Moore that photographs would be taken during the inspection (photographs are provided in Attachment #1 of this report).

B. Allentown WWTP - Background Information

Allentown WWTP is a wastewater treatment plant owned by the City of Allentown and operated by the Lehigh County Authority. According to the PADEP-issued NPDES Permit, Allentown WWTP has a hydraulic capacity of 6 million gallons per day. The NPDES Permit was originally issued in 2003 and was set to expire in 2007 but has been administratively extended since that time. The Allentown WWTP has been placed under an Administrative Order by the PA DEP in 2016 for Sanitary Sewer Overflows (SSOs) and influent bypassing. Average discharge of Allentown WWTP is approximately 32.61 million gallons per day. Allentown WWTP discharges to the Lehigh River.

According to Mr. Moore, the Allentown WWTP services fifteen municipalities and has a jurisdictional agreement with each. As a representative sample, Inspector Kline requested and received a copy of the Macungie Borough Agreement **(See Attachment #3)**. According to Mr. Moore, all agreements have been updated in 2017.

Inspector Kline asked when the last time Allentown WWTP evaluated their local limits for the Pretreatment Program. Mr. Moore stated the local limits will be evaluated after they receive their updated NPDES Permit. Inspector Kline asked Mr. Moore if Allentown WWTP was current with all EPA annual reporting requirements. Mr. Moore stated Allentown WWTP is current and has not been late with annual reporting. The most recent Annual Report that Allentown WWTP submitted was in 2022 **(See Attachment #4)**.

Mr. Moore stated Allentown WWTP accepts hauled-in wastes from porta-potties, and some industrial sludges. Mr. Moore denied accepting any Oil and Gas Production and or Oil and Gas Exploration Wastes. According to Mr. Moore, generated Class B Biosolids are taken from the Allentown WWTP by Synagro for land application.

Inspector Kline asked Mr. Moore if Allentown WWTP had a Fats Oil and Grease (FOG) Program. Mr. Moore stated the city implements the program and is funded by fees charged to each industry.

C. Allentown WWTP - Industrial Pretreatment Program File Review

Inspector Kline conducted an Industrial Pretreatment Program File Review at Allentown WWTP. According to Mr. Moore, Allentown WWTP currently has thirty-nine permitted industrial users (IUs). Inspector Kline requested and received a listing of IUs and their addresses **(See Attachment #5)**. According to Mr. Moore, fourteen of the IUs are categorical industrial users (CIUs).

Inspector Kline asked Mr. Moore how Allentown WWTP identifies potential industrial users. Mr. Moore stated he works closely with the City Codes and Building Permits Department and reviews building permit applications and searches for new tenants within their service area on the internet. Mr. Moore stated that once a facility has been identified as having the potential to be a permitted facility, a phone call or letter would be sent to the location.

Inspector Kline asked Mr. Moore if IU inspections and/or sampling are conducted. Mr. Moore stated each IU is inspected annually. Mr. Moore added all IUs are sampled at least twice annually on their behalf by Suburban Testing Lab, a contracted third-party lab.

Inspector Kline asked Mr. Moore if any of the IUs had any permit parameter exceedances in the past three years. Mr. Moore stated most of the exceedances were pH. Mr. Moore provided Inspector Kline with a list of exceedances and the actions taken by the Allentown WWTP:

IU	Violation	Date	Enforcement Action
Cintas	Oil and Grease (TPH) exceedance	1/12/2023	NOV
	Oil and Grease (TPH) exceedance	4/7/2022	NOV
	TPH, Cu, MO, Zn exceedances	10/7-11/ 2022	NOV
	Failure to report	8/31/2021	NOV/SNC
American Craft Brewery	pH exceedance	7/26/2023	NOV
	pH exceedance	6/27/2021	NOV

	pH exceedance	3/22/2021	NOV
	pH exceedance	3/15/2021	NOV
	pH exceedance	1/31/2021	NOV
Coca-Cola	Color impact	1/31/2023	NOV
Clemens Food Group	Oil and Grease	1/14/2022	NOV
	Oil and Grease	7/22-23/ 2022	NOV
Ocean Spray	pH exceedance	5/11/2022	NOV
Ocean Spray	pH exceedance	11/17/2021	NOV
Air Products (newest IU)	Molybdenum exceedance	6/8/2022	NOV
Motts	pH exceedance	6/10/2021	NOV
SunOpta Foods	Failure to report	10/6/2022	NOV/SNC
St. Luke's Health Network	Failure to report	8/31/2021	NOV/SNC
Vorteq Coil Finishers	Cyanide exceedance	8/26/2021	NOV/SNC

Inspector Kline completed the Field Audit Checklist with input from Mr. Moore (**See Attachment #6**).

Inspector Kline requested and received a copy of the IU Permit issued to the Lehigh County Authority Pretreatment Plant located at 7676 Industrial Boulevard in Allentown (**See Attachment #7**). Inspector Kline requested and received a copy of the Lehigh County Authority Pretreatment Plant Aerial Map (**See Attachment #8**), and a copy of the pretreatment flow diagram (**See Attachment #9**).

Inspector Kline requested and received a copy of the IU Permit issued to Cintas Corporation located at 164 East Main Street in Emmaus (**See Attachment #10**). Inspector Kline requested and received a copy of the most recent inspection of Cintas Corporation dated November 16, 2022 (**See Attachment #11**).

As part of the PCI, Inspector Kline selected both the Lehigh County Authority Pretreatment Plant and Cintas Corporation for the IU tour portions of the inspection. Inspector Kline decided that the Lehigh County Authority Pretreatment Plant would be inspected on September 20, 2023, and Cintas Corporation would be inspected on September 21, 2023.

II. IU Inspection- Lehigh County Authority Pretreatment Plant

A. Lehigh County Authority Pretreatment Plant - Opening Conference

Inspector Kline and Mr. Moore arrived at Lehigh County Authority Pretreatment Plant on September 20, 2023, at approximately 12:30 PM (**See Attachment #1- Photos #2 & #3**). Inspector Kline presented his credentials to Ms. Diana Heimbach, Project Manager at the outset of the inspection. Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed Ms. Heimbach that any information that she deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. During the inspection, Ms. Heimbach did not identify any CBI. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Allentown WWTP Pretreatment Program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Lehigh County Authority Pretreatment Plant - Background Information

Inspector Kline asked Ms. Heimbach to briefly describe operations at the Lehigh County Authority Pretreatment Plant. Ms. Heimbach stated the plant is owned by the Lehigh County Authority and is operated under contract by Jacobs, which is headquartered in Dallas, TX.

According to Ms. Heimbach, there are fourteen employees at this location. Inspector Kline asked what plant operating hours are. Ms. Heimbach stated operations are 6:00AM to 6:00PM Monday through Friday with limited staffing on weekends with 6:00AM to 2:00PM operations on Saturday and 7:00AM to 12:00PM on Sundays.

Inspector Kline asked who conducts the sampling and analytical analysis of the samples collected. Ms. Heimbach stated sample collection is conducted by the plant staff and analysis is conducted in their in-house accredited lab except for metals, which are analyzed by Suburban Testing Labs, a contracted third-party lab. Ms. Heimbach stated Mr. Andrew Burcaw, Lab Manager receives all analytical reports and sends the reports to Mr. Moore. Inspector Kline asked how long it takes the analytical report to reach Mr. Moore. Ms. Heimbach stated roughly two weeks. Inspector Kline asked Ms. Heimbach if the plant had any exceedances in the previous three years. Ms. Heimbach stated they have not had any exceedances in the past three years.

C. Lehigh County Authority Pretreatment Plant - Observations

Inspector Kline requested to tour the plant. Accompanying Inspector Kline on the tour were: Ms. Heimbach and Mr. Moore.

Observation #1: The first area visited was effluent sampling location. Inspector Kline observed a refrigerated ISCO 5800 Composite Sampler (**See Attachment #1- Photo #4**). The sampler appeared to be in operation. Inspector Kline requested to observe inside the refrigerated compartment. Inspector Kline observed a thermometer which read 3.5 degrees Celsius (**See Attachment #1- Photo #5**).

Observation #2: Inspector Kline observed the secondary clarifiers (two- 800,000-gallons each). Ms. Heimbach stated that secondary clarifier #2 (**See Attachment #1- Photo #6**) is currently underperforming and that active troubleshooting to rectify the problem is underway. Mr. Moore stated a seal was replaced at the activated sludge box that did not correct the problem. Ms. Heimbach stated at the present moment they currently have not discovered a solution to the problem.

Observation #3: Inspector Kline toured the Lab. Inspector Kline observed the pH meter and buffers used for the three-point calibration of the meter. All buffer solutions were within the effective use dates. Inspector Kline observed the PADEP Laboratory Accreditation Certificate posted on the wall of the Lab (**See Attachment #1- Photo #7**). The certificate expires May 31, 2024. Inspector Kline observed that the Lab appeared neat and orderly.

This concluded the physical inspection portion of the Lehigh County Authority Pretreatment Plant. Inspector Kline and Mr. Moore left the plant at approximately 3:30PM.

III. IU Inspection- Cintas Corporation

A. Cintas Corporation - Opening Conference

Inspector Kline, Mr. Moore and Mr. William “Billy” Brogan, Jr., Pretreatment Inspector, arrived at Cintas Corporation “Cintas” (**See Attachment #1- Photo #8**) on September 21, 2023, at approximately 8:30AM. Inspector Kline presented his credentials to Mr. Donnie McHugh, Maintenance Supervisor at the outset of the inspection. Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed Mr. McHugh that any information that he deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. During the inspection, Mr. McHugh did not identify any CBI. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Allentown WWTP Pretreatment Program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Cintas Corporation – Background Information

Inspector Kline asked Mr. McHugh to provide a brief historical description of their facility and what Cintas does at this location. According to Mr. McHugh, this Cintas location is a laundry facility primarily for uniforms, carpets, mop heads and towels. Mr. McHugh stated they have roughly the same customer base for nearly eight years. Mr. McHugh added Cintas purchased the location in 2001; prior to that it was RUS (Rental Uniform Services) which originated in 1964.

Inspector Kline asked, in addition to the IU Permit issued by Allentown WWTP, whether Cintas has other permits or generates hazardous wastes. Mr. McHugh stated this location does have an Air Permit issued by the PA DEP.

Inspector Kline asked Mr. McHugh how many employees are at this Cintas location. Mr. McHugh stated there are 268 full-time employees. Inspector Kline asked what Cintas operating hours are. Mr. McHugh stated there are three shifts, five days a week (Monday through Friday).

Inspector Kline asked Mr. McHugh to describe the process and wastewater treatment system at Cintas. Mr. McHugh stated the system has a 65,000-gallon equalizer tank which can hold all the generated wastewater. Mr. McHugh stated he did not have a process flow diagram but could describe the overall process. Mr. McHugh stated all wastewater is directed through the wash alley to Pit #1, then to the shaker to remove lints. Water is then sent to Pit #2, then the equalizer tank. Water is sent to the emulsion tank where coagulants (clay and flocculants) are added. Water is then sent to a dissolved air floatation (DAF) unit and then to Pit #3 where the effluent samples are collected. Mr. McHugh stated Pit #3 is located outside the building within the fence of Cintas. Mr. Moore stated Pit #3 is the permitted B1 effluent sample location which is in their IU Permit.

Inspector Kline asked who conducts the sample collection and analytical analysis of the samples. Mr. McHugh stated sample collection is coordinated by Mr. Carlos Echervarrja, Maintenance Technician II, along with Schuler's Plumbing. According to Mr. McHugh, Schular's Plumbing transports the samples to Micro Lab. Mr. McHugh added analysis is conducted by Micro Lab, which is their contract lab located in Wilkes Barre, PA. Once the lab completes the analysis, a report is sent to Mr. McHugh, and Mr. McHugh sends a copy to Mr. Moore. Inspector Kline asked how long it takes the lab to return the analytical report. Mr. McHugh stated roughly two to three weeks.

Inspector Kline asked Mr. McHugh if Cintas had any permit parameter exceedances within the past three years. Mr. McHugh stated they did have some unexplained TPH exceedances with the most recent exceedance (which resulted in a Notice of Violation) occurring in January of this year. Mr. McHugh did not know the cause but believed the exceedance might have come from their bulk towel laundry service. Mr. McHugh stated they would monitor the situation and alert their customers.

C. Cintas Corporation - Observations

Inspector Kline requested to tour Cintas. Accompanying Inspector Kline on the tour were: Mr. Moore, Mr. Brogan, and Mr. McHugh.

Observation #1: Inspector Kline observed the laundry operations within the facility. Inspector Kline observed that these areas appeared neat and orderly.

Observation #2: Inspector Kline toured the wastewater treatment areas. The equipment appeared to be in operation and functioning. Inspector Kline observed their flow and equalizer monitors (**See Attachment #1- Photo #9**). Both units appeared to be energized and providing instantaneous readings.

Observation #3: Inspector Kline observed Pit #3 (**See Attachment #1- Photo #10**). Pit #3 is located outside the Cintas building and is covered by an aluminum lid which was at ground level and was closed. Inspector Kline asked McHugh if the lid could be opened. Mr. McHugh opened the lid. Inspector Kline observed an active flow discharging to the pit (**See Attachment #1- Photo #11**).

Observation #4: Inspector Kline requested to observe the Maintenance Area. Inspector Kline observed several aerosol cans within this area. Inspector Kline asked Mr. McHugh what happens to the waste aerosol cans. Mr. McHugh stated the aerosol cans would be disposed in the regular trash. Inspector Kline stated the cans could not be disposed in that manner as they should be managed as universal wastes. Inspector Kline added that he conducted a similar inspection at Cintas, State College in 2022 and the same issue regarding improper aerosol can disposal had occurred there too. Mr. McHugh stated he would inform his Corporate Office.

This concluded the physical inspection portion of the Cintas Corporation. Inspector Kline left the facility at approximately 11:00AM.

IV. Closing Conferences

After the inspections of Lehigh County Authority Pretreatment Plant and Cintas Corporation, Inspector Kline conducted individual closing conferences at each facility. Attending the closing conference at Lehigh County Authority Pretreatment Plant were Ms. Heimbach and Mr. Moore. Attending the closing conference at Cintas Corporation were Mr. McHugh, Mr. Moore, and Mr. Brogan. Inspector Kline shared preliminary observations about each facility. Inspector Kline reiterated that all preliminary observations discussed were not compliance determinations. 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.

Inspector Kline conducted a closing conference with Mr. Moore following the Allentown WWTP - Industrial Pretreatment Compliance Inspection. This concluded the PCI.

V. List of Attachments

- Attachment 1.** Photographs
- Attachment 2.** NPDES Permit
- Attachment 3.** Macungie Borough Agreement
- Attachment 4.** Annual Report
- Attachment 5.** IU List
- Attachment 6.** Checklist
- Attachment 7.** LCAPP-IU Permit
- Attachment 8.** LCAPP- Map
- Attachment 9.** LCAPP-Flow Diagram
- Attachment 10.** Cintas- IU Permit
- Attachment 11.** Cintas- Inspection Report