

Lower Allen Township Authority (PA0027189)
Pretreatment Compliance Inspection



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): April 24-25, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: Lower Allen Township Authority
Facility Address: 120 Limekiln Road, New Cumberland, PA 17020
Facility Latitude: 40.216434
Facility Longitude: -76.877431
County/Parish: Cumberland County
Permit No: PA0027189
NAICS Code: 221320
SIC: 4952
Unique Project #: ECAD-484

Facility Representatives:

Point of Contact

Brian Kauffman, Manager/Engineer

Email: bkauffman@latwp.org



Matthew Reitzel, Laboratory Supervisor/Pretreatment Coordinator

Email: mreitzel@latwp.org

Inspectors:

Chuck Durham, Eastern Research Group

Email: chuck.durham@erg.com

Sirese Jacobson, Eastern Research Group

Email: sirese.jacobson@erg.com

(Full list of additional attendees in Table 1)

Report Preparer

Signature/Date

A handwritten signature in black ink that reads "Chuck Durham".

6/21/2024

Chuck Durham, Eastern Research Group

Date

JESSICA
DUFFY

Digitally signed by
JESSICA DUFFY
Date: 2024.06.21
14:27:57 -04'00'

Supervisor

Signature/Date

Jessica Duffy, NPDES 2 Section Chief

Date

Enforcement and Compliance Assurance Division

Unique Project#: ECAD-484

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

I. Inspection Summary

Upon arrival at the Lower Allen Township Authority (LATA or Facility), EPA contractors Chuck Durham and Sirese Jacobson, and United States Environmental Protection Agency (EPA) Region 3 representatives Monica Crosby and Shane McAleer (jointly referred to as the Inspection Team), met with the Facility representatives). See Table 1 below for a full list of attendees. LATA owns and operates the Lower Allen Township Wastewater Treatment Plant (WWTP). 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 mild and sunny during the inspection.

Table 1: Additional Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Monica Crosby	Environmental Protection Agency	(410) 305-3029	Crosby.Monica@epa.gov
Shane McAleer	Environmental Protection Agency	(215) 814-5616	McAleer.Shane@epa.gov
Chuck Durham	EPA Contractor, Eastern Research Group	(615) 888-2928	Chuck.Durham@pgenv.com
Sirese Jacobson	EPA Contractor, Eastern Research Group	(720) 789-8044	Sirese.Jacobson@pgenv.com
Site/Facility Representatives			
Brian Kauffman	Lower Allen Township Authority	(717) 774-0610	bkauffman@latwp.org
Matthew Reitzel	Lower Allen Township Authority	(717) 774-0610	mreitzel@latwp.org
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:

- Dairy Farmers of America (DFA; non-categorical significant industrial user [SIU])
- Supply Chain Facility at Yetter Court (facility operator is Cargill Meat Solutions [Cargill]; non-categorical SIU)
- The Warrell Corporation (non-categorical SIU)

As part of the inspection, the Inspection Team also conducted site visits at Cargill and DFA. 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 PCI performed in 2014.

II. Program Description

The LATA WWTP has a design capacity of 7.5 million gallons per day (MGD) with an average flow of 4.9 MGD. The wastewater treatment process consists of an influent wet well/pump station, primary clarifier distribution box, two primary clarifiers, aeration tank distribution box, two aeration trains including two primary anoxic zones, two oxic zones and secondary anoxic zones, three final clarifiers, ultraviolet disinfection tank. The WWTP discharges to the Susquehanna River.

According to the Facility representatives, LATA provides wastewater treatment for Lower Allen Township, Upper Allen Township, Fairview Township, Department of Corrections State Correctional Institute, and two connections in Hampton Township.

III. Industrial User (IU) Characterization

IUs currently identified by the Control Authority (CA)	IU Type
3	Discharging Significant Industrial Users
3	Discharging Non-Categorical SIUs (as defined by the CA)
0	Categorical Industrial Users (CIUs)
0	Middle Tier CIUs
0	Zero-Discharging CIUs
0	Non-significant CIU (NSCIU)
0	Other Regulated IUs (e.g., permitted IUs) Describe: Not applicable (N/A)
0	Waste Haulers Describe: LATA does not accept hauled waste.

IV. Findings Summary Table

Finding C.4.a – The permits reviewed did not specify how biochemical oxygen demand (BOD) and total suspended solids (TSS) limits are to be applied.
Finding C.4.b – The IU permits give permittees the authority to direct LATA to sample on behalf of the permittees.
Finding C.4.c – The permits reviewed contain requirements for LATA.
Finding C.4.d – The permits did not include a requirement for the industry to notify LATA of changes affecting the potential for a slug discharge.
Finding C.4.e – The permits did not include adequate recordkeeping requirements.
Finding C.4.f – The permits did not include requirements for notification of changes affecting the potential for a slug discharge.
Finding D.2 – LATA has not formally evaluated all IUs for the need for a slug discharge control plan.
Finding E.2.a – LATA is not performing independent monitoring for all parameters.
Finding E.2.b – LATA's inspection reports of The Warrell Corporation appear to be copies from previous years.
Finding E.2.c – The Inspection Team identified inconsistency with information provided about how often the pH probe is calibrated at Cargill.

IV. Findings Summary Table
Finding E.5.a – LATA did not ensure that IUs submitted all monthly self-monitoring reports.
Finding E.5.b – LATA is accepting electronic reports and not requiring hardcopy wet-ink reports to be submitted.
Cargill Site Visit Data Sheet – The SIU was using expired pH buffers to calibrate the pH meter.
Cargill Site Visit Data Sheet – Totes in the storage area were improperly open.

V. Evaluation
The Inspection Team discussed the topics in Subsections A-F 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. All compliance assistance items are included strictly for informational purposes and should not be construed as a formal order or instruction from EPA.

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 last revised its Sewer Use Ordinance (SUO) and Enforcement Response Plan (ERP) in 2010. According to the Facility representatives, the last evaluation of local limits was in 2017. The Facility did not actually conduct a headworks analysis, but simply compared influent loadings to allowable loadings and determined the WWTP had sufficient capacity and that the local limits were protective.

The Facility representatives stated that the local limits sampling plan was going to be submitted to EPA Region 3 on April 24, 2024.

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 Facility representatives, in addition to Lower Allen Township, LATA accepts wastewater from Upper Allen Township, Fairview Township, the Department of Corrections State Correctional Institute, and two connections in Hampton Township. According to the LATA representatives, LATA has agreements with each contributing jurisdiction, and LATA implements all aspects of the pretreatment program

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))

The Facility representatives stated that a formal Industrial Waste Survey (IWS) has not been conducted in 7 to 8 years. Within the Township, the agreement requires the Sewer Authority to approve and grant sewer capacity before new connections are allowed and it is the same procedure for an industry moving into an existing building. The Facility would be able to identify change of ownership through sewer billing software.

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))

All SIUs whose files were reviewed during the inspection had been issued an individual permit. SIU permits are issued for two to three years. The Facility was not implementing any general permit options at the time of the inspection.

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. LATA 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. LATA 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. LATA had not issued general control mechanisms at the time of the inspection.

Finding C.4.a – The permits reviewed did not specify how biochemical oxygen demand (BOD) and total suspended solids (TSS) limits are to be applied.

The permits reviewed were not clear about how the limits for BOD and TSS are to be applied. It is not clear whether the BOD and TSS values in the permits are local limits or surcharge parameters. Furthermore, the Inspection Team did not see any reference to these BOD or TSS values in the Facility's SUO. Therefore, it is not clear whether the Facility has the authority to enforce these values.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to include effluent limits based on applicable general pretreatment standards, categorical pretreatment standards, local limits, and state and local law.

Finding C.4.b – The IU permits give permittees the authority to direct LATA to sample on behalf of the permittees.

Part 2.C.7 of the IU permits allows the Permittee to grant written approval for LATA to sample on the Permittee's behalf.

Regulatory Authority

The Facility has the authority to randomly sample the effluent from its SIUs under its delegated authority to implement the National Pretreatment Program at 40 CFR 403.8. That authority is also extended to performing all monitoring in lieu of requiring the SIU to conduct self-monitoring, solely at the Control Authority's discretion, and does not require approval from the SIU. The permit should not contain language further authorizing sampling at the IU. In addition, as the Control Authority, the Facility has the authority to conduct sampling at its SIUs through its approved SUO (Section 7.1).

Finding C.4.c – The permits reviewed contain requirements for LATA.

The SIU permits reviewed contained language noting requirements placed on LATA. For example, Part 3.C.5 of the permits state “The Authority shall evaluate whether each SIU needs an accidental discharge/slug discharge control plan or other action to control Slug Discharges.”

Finding C.4.d – The permits did not include a requirement for the industry to notify LATA of changes affecting the potential for a slug discharge.

The permits reviewed were missing the requirement for notification of change affecting potential for slug discharge.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require all control mechanisms to include notification requirements specified in 40 CFR Part 403. Furthermore, the federal regulation at 403.8(f)(2)(vi) requires SIUs to notify the Control Authority immediately of any changes at the facility affecting the potential for a slug discharge.

Finding C.4.e – The permits did not include adequate recordkeeping requirements.

The permits reviewed required the permittees to maintain records for three years and to retain records beyond three years during any ongoing litigation. However, the permits do not require the permittees to retain records for a period longer than three years at the request of EPA.

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 403.8(f)(1)(iii)(B)(4) require that permits include record-keeping requirements. The federal regulations at 40 CFR 403.12(o)(2) require records must be maintained for at least three years. Additionally, the retention period is extended during unresolved litigation or when requested by the Director or the [EPA] Regional Administrator.

Finding C.4.f – The permits did not include requirements for notification of changes affecting the potential for a slug discharge.

Regulatory Requirement

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.

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))

Based on the permits reviewed LATA applies all applicable pretreatment standards correctly.

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

No.

Finding D.2 – LATA has not formally evaluated all IUs for the need for a slug discharge control plan.

LATA has not formally evaluated each SIU for the need for a slug discharge control plan.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(vi) require Control Authorities to evaluate whether each SIU needs a plan or other action to control slug discharges. If the Control Authority requires an SIU to develop and implement a plan, the Control Authority is required at 40 CFR 403.8(f)(1)(iii)(B)(6) to include the requirement for the plan in the SIU's permit.

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 LATA representatives, LATA has been conducting inspections and sampling at least once per 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))

In general, according to the information reviewed during the inspection, LATA uses proper sampling, analysis, and inspection procedures, except where noted below.

Finding E.2.a – LATA is not performing independent monitoring for all parameters.

LATA is not monitoring for pH independently of its SIUs – LATA is taking an instrument reading from the IUs' pH meters.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) require LATA to conduct surveillance activities in order to identify, independent of information supplied by IUs, occasional and continuing noncompliance with pretreatment standards.

Finding E.2.b – LATA's inspection reports of The Warrell Corporation appear to be copies from previous years.

The Warrell Corporation inspection reports appear to be copies from previous years. The Inspection Team noted that the 2022 and 2023 reports state that The Warrell Corporation is in SNC for FOG and is on a compliance schedule to develop a corrective action plan and that a meeting is scheduled with

the IU for November 2015, which has long since passed. This language appears to be carried over from past reports and is no longer applicable to actual activities.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) and 40 CFR 403.8(f)(2)(vii) require POTWs to inspect SIUs at least once a year and document information with sufficient care to produce evidence admissible in enforcement proceedings.

Finding E.2.c – The Inspection Team identified inconsistency with information provided about how often the pH probe is calibrated at Cargill.

The inspection report for Cargill says the pH probe is calibrated weekly. However, during the site visit at Cargill the IU representative said the pH probe is calibrated monthly.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) and 40 CFR 403.8(f)(2)(vii) require POTWs to inspect SIUs at least once a year and document information with sufficient care to produce evidence admissible in enforcement proceedings. Inspection reports must reflect what is actually occurring at the IU.

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, LATA 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. LATA 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, LATA has been requiring, and receiving required reports. However, the Facility has not ensured all reports are submitted and is allowing electronic reports only.

Finding E.5.a – LATA did not ensure that IUs submitted all monthly self-monitoring reports.

The Inspection Team did not find the self-monitoring report for December 2022 while reviewing the files for The Warrell Corporation.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(iv) require the POTW to “[r]eceive and analyze self-monitoring reports and other notices submitted by Industrial Users.” The permit for Warrell requires submittal of monthly self-monitoring reports.

Finding E.5.b – LATA is accepting electronic reports and not requiring hardcopy wet-ink reports to be submitted.

LATA is accepting electronic reports only from SIUs. These electronic reports are not followed up with hard copy reports with wet ink signature. Electronic reporting as a sole means of reporting is not allowed because LATA has not received CROMERR approval from EPA.

Regulatory Requirement

The federal regulations at 40 CFR Part 3 contain the Cross-Media Electronic Reporting Rule (CROMERR) which provides the legal framework for electronic reporting under all of EPA’s environmental regulations. The rule removes regulatory obstacles to e-reporting under Title 40 of the Code of Federal Regulations (CFR). States and local governments must apply for, and receive approval from EPA, before accepting electronic data and signatures. Pretreatment programs without CROMERR approval must receive reports in hard copy with original wet-ink signatures. Until such time that the Facility meets the criteria listed above and receives CROMERR approval from EPA, all reports received from SIUs must be in hardcopy, wet-ink, format.

- 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 re-sampled 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))**

N/A. LATA does not have CIUs.

- 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 file reviewed, LATA 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))

N/A. LATA does not have CIUs.

10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12 (j) & (p))

No, LATA 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))

Yes, based on the files reviewed by the Inspection Team and responses from LATA Representatives, LATA has been implementing its ERP.

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))

Yes, LATA evaluates SNC according to the definition in its SUO. LATA publishes a list of SIUs in SNC in the *Sentinel*.

2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.

No, LATA 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))

The Facility has 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. LATA has not identified any 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 review.

G. Additional Evaluations

1. Hauled Waste

According to LATA representatives, LATA does not accept hauled waste.

2. Dental Mercury Program

According to the Facility representatives, there are 11 dental facilities in the service area and 8 of the 11 facilities sent one-time certification statements to EPA Region 3.

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

LATA does not issue permits to food service establishments (FSEs). FSEs are inspected only if LATA identifies a problem.

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: Cargill					
Address of industry: 2700 Yetter Court, Camp Hill, PA 17011					
Date of visit: 4/24/2024			Time of visit: 10:15 AM – 12:02 PM		
Name of inspectors: Brian Kauffman, Matthew Reitzel (LATA) Chuck Durham and Sirese Jacobson (Eastern Research Group) Shane McAleer and Monica Crosby (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Mike Fluck		EHS Manager			
Aaron Humes		Plant Manager			
IU Permit Number: SCF-2022-26		Exp. Date: August 31, 2026		IU Classification: Non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility purchases boxed beef and cuts and portions it.					
2. Number of employees:	~500	Number of shifts:	2	Hours of operation:	5 days/week, Monday-Friday
3. Wastestream flow(s) discharged to the POTW: The SIU generates wastewater primarily from cleaning process equipment and floor washdown.					
Sanitary:	Not provided	Process:	~50,000 gpd (average)	Combined:	N/A
4. Describe any significant changes in process or flow: None identified during the inspection.					
5. Type of pretreatment system (Describe): Wastewater flows to the lift station. From the lift station, wastewater is pumped through a drum screen and then to the EQ tank and then to the SAF system where polymer and coagulant are added. Wastewater from the SAF system is pumped to the 301 tank for pH neutralization using sodium hydroxide or sulfuric acid (Photograph 1). Treated wastewater is pumped to the sanitary lift station which is the sampling point. Solids from the SAF system go into the 6,000-gallon sludge holding tank and are hauled offsite weekly by Kline's. The inspection team asked to see the facility's pH buffer solutions. All three buffer solutions had expiration dates of 2022. (see Finding 1 below).					

☐ Continuous flow	☒ Batch	☐ Combined
6. Process area description: The industry representatives walked the inspection team through the process areas. They first visited the Grind Department. Meat that falls onto the floor is collected and hauled offsite by Darling Delaware for rendering. The inspection team proceeded to the Receiving Area which contained a few floor drains, all of which go to the wastewater treatment system. Then, they entered the Whole Muscle/Slicing Department which contained 12 processing lines.		
7. Chemical storage area: At the time of the inspection, the industry was storing chemicals including detergent/degreaser, sanitizer, sodium hypochlorite, and acids. The floor drain in the chemical storage area drains to the wastewater treatment system. The inspection team observed open totes in the storage area (see Finding 2 below). The inspection team also noted a couple of the chemical drums were extending beyond the confines of the secondary containment pallets on which they were stored and requested they be properly stored.		
Any floor drains?	Yes	Any spill control measures? Yes; secondary containment
8. Are hazardous wastes drummed and labeled? According to the industry representatives, the industry does not generate hazardous waste.		
9. Does the IU have hazardous waste manifests? Yes		
10. Solid waste production and disposal: Sludge from the SAF and waste meat from the process are hauled offsite weekly by Kline's.		
11. Description of sample location and methods: The sample point is located in the southeast portion of the property outside the wastewater treatment building.		
Notes:		
1. <u>Finding – The SIU was using expired pH buffers to calibrate the pH meter.</u> The SIU performs calibration of its pH meter using pH buffer solutions. However, the Inspection Team observed that the pH buffer solutions (pH 4, 7, and 10 s.u.) expired in 2022. 2. <u>Finding – Totes in the storage area were improperly open.</u> The Inspection Team saw that two totes in storage area that were open. The Inspection Team recommends that the IU ensure that all totes and drums not in use are properly closed.		

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Dairy Famers of America					
Address of industry: 4825 Gettysburg Rd, Mechanicsburg, PA 17055					
Date of visit: 4/24/2024			Time of visit: 1:15 PM – 3:38 PM		
Name of inspectors: Brian Kauffman, Matthew Reitzel (LATA) Chuck Durham and Sirese Jacobson (Eastern Research Group) Shane McAleer and Monica Crosby (EPA Region 3)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title			
Gary Rutz		EH&S Supervisor			
IU Permit Number: DFA-2022-26		Exp. Date: August 31, 2026		IU Classification: Non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The industry is a copacker for Starbucks coffee drinks in glass bottles.					
2. Number of employees:	~190	Number of shifts:	3	Hours of operation:	24 hours, 6 days per week
3. Wastestream flow(s) discharged to the POTW:					
The SIU generates wastewater primarily from the clean-in-place (CIP) process of process equipment.					
The facility also washes out the trucks with cold water before sending them back to Reading, PA. The CIP wastewater from truck washing flows into a trench drain and into a pit, which is then pumped to the BOD tanks.					
Sanitary:	Not provided	Process:	205,000 gpd (average, from permit)	Combined:	N/A
4. Describe any significant changes in process or flow: None.					
5. Type of pretreatment system (Describe) (Photograph 2):					
The facility has a separator to aerate solids. Wastewater then is pumped into a 20,000-gallon holding tank where the facility measures pH and the wastewater is agitated. The pH range is set at 6-9 and the gate won't open if outside of this range. The facility adjusts the pH of the wastewater using sulfuric acid or sodium hydroxide.					
The facility also has two 4,000-gallon BOD tanks which receive bad batches, water wrung out of coffee, and washdown of batch tanks and filler bowls. The BOD tanks have a trickle back valve that goes to the POTW.					

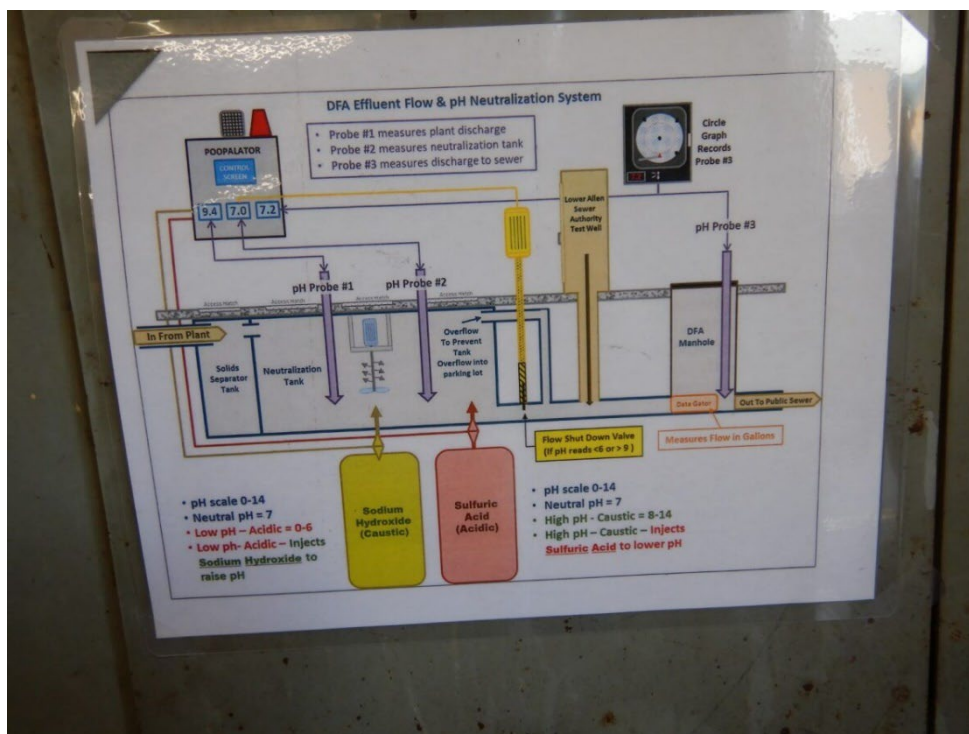
x	Continuous flow		Batch		Combined
6. Process area description: The facility receives three tankers of raw milk each day which is pumped into one of four refrigerated tanks. Condensed milk and cream are delivered directly to this facility from a facility in Reading, PA. The facility brews 13,000-gallon batches of coffee. The coffee is sent through a centrifuge and the liquid goes to the Extract tanks. The coffee grounds then go through an extruder and are placed in dumpsters and hauled offsite at least once per day by Kline's Environmental to be land applied or sent to a digester. The coffee goes into Batch tanks and is tested and is then sent to fillers. After the bottles are filled, they are sent to Retort which is an autoclave/pressure cooker. Finally, the bottles are labeled, packaged, palletized, and placed on trucks.					
7. Chemical storage area: The only designated chemical storage observed during walk-through was the bulk storage of sulfuric acid and sodium hydroxide in the waste treatment area. These chemicals are used for pH adjustment. Other food-grade detergents used in CIP are stored in a designated area as well. Ingredients are stored throughout the process area for easy access.					
Any floor drains?		Yes	Any spill control measures?		Yes; secondary containment
8. Are hazardous wastes drummed and labeled? According to the industry representatives, hazardous waste would consist of ink solvent, and any spills they can't neutralize.					
9. Does the IU have hazardous waste manifests? Yes. Hazardous wastes are picked up by Republic for off-site disposal. A recent manifest was provided for on-site review.					
10. Solid waste production and disposal: Solids from the BOD tank are hauled offsite daily by Kline's Environmental.					
11. Description of sample location and methods: Samples are collected from the sampling cleanout near the northeast corner of the building, upstream of manhole W12B-2 (Photograph 3).					
Notes:					
• None					

Attachment B

Industrial User Site Visit Photo Log



Photograph 1: View of Cargill's sodium hydroxide and sulfuric acid tanks in secondary containment.



Photograph 2: Diagram of the DFA pH neutralization system.



Photograph 3: Sampling manhole at DFA.