



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Dates: 8/9/2021 to 8/10/2021
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Field Audit Inspection
Site/Facility Name: Ridgway Borough Water Pollution Control Facility

Site/Facility Mailing Address: 108 Main Street
P.O. Box 149
Ridgway, PA 15853

Latitude: 41.4190 **Longitude:** -78.7506
County/Parish: Elk County
Permit Number: PA0023213
NAICS Code: 221320
Unique Project #: 3E21RC038A

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

Josh Quattrone, Pretreatment Coordinator/ Environmental Manager ☒

Phone: 814 776-1125 Email: josh.quattrone@ridgwayborough.com

Larry Marshal, Sewage Treatment Plant Supervisor ☐

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EPA Inspector:

Jim Kline
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10/7/2021

**Report Preparer
Signature/Date**

Jim Kline

Date

**Supervisor
Signature/Date**

Date

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I. Introduction

On August 9th and 10th, 2021, the United States Environmental Protection Agency, Region III (“EPA”), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an onsite Field Audit Inspection at the Ridgway Borough Water Pollution Control Facility (hereinafter, “the Facility”). The Facility is located at 39149 Portland Mills Road in Ridgway, Elk County, Pennsylvania (**See Attachment #1- Photo #1**).

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 U.S. EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). No PADEP Representatives attended the inspection. Due to the ongoing pandemic, Inspector Kline provided the Facility with advance notification of the inspection.

A. Opening Conference

Inspector Kline arrived at the Ridgway Borough Office located at 108 Main Street in Ridgway on Tuesday, August 9th, 2021 and presented his credentials to Mr. Josh Quattrone, Pretreatment Coordinator and Environmental Manager for the Facility. Inspector Kline conducted an opening conference with Mr. Quattrone. Inspector Kline explained the purpose and scope of the inspection to Mr. Quattrone.

Inspector Kline requested that any information that the Facility deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

B. Weather and Precipitation Conditions

During the first day of the inspection, the weather was sunny with temperature highs in the upper eighties. The second day of the inspection had mid-day rain.

II. Facility Activity

Mr. Quattrone stated that he is the Environmental Manager for the Borough, which also includes being the Pretreatment Coordinator for the Facility. Mr. Quattrone added that the former Pretreatment Coordinator recently retired. Mr. Quattrone stated that he maintains all the Industrial User (IU) records at his office.

Mr. Quattrone stated that they have eight IUs (**See Attachment #2**). According to Mr. Quattrone, two of the IUs are Significant Industrial Users (SIUs) and the remainder are Categorical Industrial Users (CIUs). The two SIUs are Greenline Polymers and Casella Waste Management. Mr. Quattrone stated both SIUs truck their waste to the Facility. Mr. Quattrone added that all CIUs are hard piped to the Facility. Inspector Kline requested to review all IU folders. Inspector Kline asked Mr. Quattrone if any IU had any ongoing issues or permit exceedances. Mr. Quattrone stated that Alpha Sintered Metals had a “lab error” occur regarding samples that were collected on September 30, 2020. Inspector Kline requested Mr. Quattrone to call Mr. Kyle Schneider, EHS Manager, Alpha Sintered Metals contact person. Inspector Kline spoke with Mr. Schneider. Mr. Schneider stated that routine samples were collected on September 30, 2020. According to Mr. Schneider, analysis was requested and to be performed for chloride, fluoride, and sulfate but analysis did not happen. Inspector Kline asked Mr. Schneider when he became aware that those three parameters were not tested. Mr. Schneider stated he was informed on November 2, 2020 that the lab made a mistake and did not analyze those parameters. Inspector Kline asked Mr. Schneider since after becoming aware of the mistake, when were samples collected for analysis of those three parameters. Mr. Schneider stated a sample was collected on November 24, 2020. Inspector Kline asked Mr. Schneider why samples were not collected immediately after becoming aware of the lab mistake. Mr. Schneider did not offer an explanation but did state that the lab has since been purchased by a larger company and has not since had any issues. Inspector Kline requested and received copies of the sampling event including: IU self-monitoring report (SMR), certificates of analysis, chains of custody, and a response letter from the Facility dated January 11, 2021 (**See Attachment #3**). Mr. Quattrone stated this IU has not had any other issue or permit exceedance since.

Mr. Quattrone stated the Allegheny Coatings had a zinc exceedance on April 30, 2021. Mr. Quattrone stated a second location, Allegheny Coatings - Boot Jack had a zinc exceedance in 2017. Inspector Kline requested and received copies of the sampling event including: correspondence from the IU to the Facility (dated July 19, 2021), correspondence from the Facility to the IU (dated July 22, 2021), and Second Quarter Discharge Limit Compliance Report dated July 15, 2021 (**See Attachment #4**). Mr. Quattrone stated according to the IU, the error involved inadequate employee training.

Inspector Kline completed the Field Audit Checklist with input from Mr. Quattrone (**See Attachment #5**). Inspector Kline selected Allegheny Coatings, Inc. located at 224 River Road in Ridgway to conduct the IU portion of the Field Audit Inspection. Inspector Kline decided to meet with Mr. Quattrone and to conduct the IU visit later that afternoon.

III. Observations (IU)

Inspector Kline, Mr. Quattrone and Mr. Mason Stark, Wastewater Operator met at Allegheny Coatings, Inc. **(See Attachment #1- Photo #2)**. Mr. Jesse Bosnic, Production Manager, Mr. Scott Brown, General Manager greeted Inspector Kline, Mr. Quattrone and Mr. Stark. Inspector Kline presented his credentials to Mr. Brown and conducted an opening conference. Attending from Allegheny Coatings, Inc. were Mr. Bosnic, Mr. Brown and Mr. Dave Santaniello, EHS Manager. Inspector Kline explained the purpose and scope of the inspection.

Inspector Kline requested that any information that the Facility deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures. Mr. Santaniello stated that from what Inspector Kline would be observing there wouldn’t be CBI.

Mr. Brown and Mr. Santaniello briefly described operations at the Allegheny Coatings location. According to Mr. Santaniello, primary operations include zinc plating for high performance coatings of parts used in the automotive industry. Mr. Brown added that they currently have one hundred-thirty (130) full-time employees.

Inspector Kline asked Mr. Santaniello to describe the operations. Mr. Santaniello stated the pretreatment process occurs following the various multiple series of zinc and chromate plating, cleaning, and rinsing from the barrel plating line. Inspector Kline requested and received a simplified process flow diagram **(See Attachment #6)**. Mr. Santaniello added that the samples per their IU Permit are taken from the pretreatment holding tank. According to Mr. Santaniello, this tank is filled and emptied two to three times weekly with twelve hundred (1,200) gallons being discharged per event. Prior to the tank being drained and sent to the Facility, a technician will first notify the Facility.

Inspector Kline, Mr. Stark and Mr. Quattrone were escorted on a tour of the Allegheny Coatings operations and were escorted to the Pretreatment Holding Tank **(See Attachment #1- Photo #3)**. According to Mr. Santaniello and Mr. Quattrone this tank is where all samples are collected.

Inspector Kline conducted a brief closing conference. This concluded the inspection for the day.

IV. Observations (POTW)

Inspector Kline returned to the Facility on Tuesday, August 10th, 2021 and met with Mr. Larry Marshal, Wastewater Plant Supervisor, Mr. Mason and Mr. Quattrone. Inspector Kline reviewed analytical reports, certificates of analysis along with chain of custody forms. Inspector Kline asked Mr. Marshal if the Facility accepts any hauled in wastes. Mr. Marshal stated yes, they accept septic from porta-johns. Mr. Quattrone provided Inspector Kline with a list of approved

septic haulers (**See Attachment #7**). Mr. Marshal and Mr. Quattrone lead Inspector Kline on a tour of the Facility. Inspector Kline was then taken to the final stop which was the permitted outfall to the Clarion River (**See Attachment #1- Photo #4**).

Inspector Kline requested to tour the Brine Storage Area. Mr. Quattrone provided Inspector Kline with a list of approved Brine Customers (**See Attachment #8**). Mr. Quattrone stated all Brine comes from conventional stripper wells only. The Facility accepts this waste from 6 AM until 3 PM with an overall Facility combined limit of twenty-five thousand (25,000) gallons per day. According to Mr. Quattrone, there are ten indoor brine storage tanks that each have three-thousand-gallon (3,000) capacity (**See Attachment #1- Photos #5 & #6**). Mr. Quattrone stated that the pH of each brine delivery is tested. Inspector Kline asked if there was other analytical testing conducted. Mr. Quattrone stated the waste is visually inspected and all samples are witnessed, but there is no additional testing.

V. Closing Conference

Inspector Kline conducted a closing conference. Inspector Kline shared preliminary observations about the Facility and the IU Pretreatment Program. Inspector Kline reiterated with Mr. Quattrone and Mr. Marshal that all the preliminary observations discussed were not compliance determinations. 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 report and the attachments that were not identified at the time of the closing conference.

VI. Follow-up Communications

Inspector Kline received two e-mail from Mr. Quattrone on August 11, 2021. The e-mails pertained to a CWA 308 Request from EPA Region 3 and addresses for each of the IUs.

VII. List of Attachments

Attachment 1: Photos

Attachment 2: IU Listing (addresses and contact information)

Attachment 3: IU- Alpha Sintered Metals Sampling Event

Attachment 4: IU- Allegheny Coatings Inc. Sampling Event

Attachment 5: POTW Field Audit Checklist

Attachment 6: Allegheny Coatings, Inc. Process Flow Diagram

Attachment 7: Septic Haulers

Attachment 8: Brine Customers