



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 09/27/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Wastewater
Site/Facility Name: Eagle Valero GWCU
Permittee(s): Dunne Manning Realty LP
Site/Facility Operator: Eagle Valero GWCU
Site/Facility Address: 37 Pottstown Pike
Uwchlan, PA 19425
Latitude: 40.073611 **Longitude:** -75.683889
County/Parish: Chester
Permit Number: PA0245119
NAICS Code: 811111 **SIC:** 7538
Unique Project #: 3E23WN123A

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Date

Unique Project#: 3E23WN123A

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I. Introduction

On September 27, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an Industrial Wastewater Inspection of the Eagle Valero GWCU facility (hereinafter, “the facility”) located at 37 Pottstown Pike, Uwchlan, PA, 19425. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PA0245119 (hereinafter, the “Permit”) and applicable State and Federal regulations. The permit became effective on September 1, 2019 and shall expire on August 31, 2024.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 10:20 AM for the inspection. Inspectors met with the following facility representative:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Angela Weisel	Lead EPA Inspector	215-814-2124	Weisel.angela@epa.gov
Shane McAleer	EPA Inspector	215-814-5616	McAleer.shane@epa.gov
Site/Facility Representatives			
Ben Andes	Synergy Environmental Inc.	484-369-5000	bandes@synergyenvinc.com

Angela Weisel displayed her credentials to the facility representative at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Attachment A. The EPA Inspection Team informed the facility representative 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, weather was overcast. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/22/2023	0
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/23/2023	0.4
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/24/2023	0.35
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/25/2023	0.3
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/26/2023	0.25
UNIONVILLE 1.4 NNE, PA US, US1PACN0037	9/27/2023	0.15

C. Summary of the Facility

The facility is a groundwater pump and treat system located at 37 Pottstown Pike, Chester Springs, PA 19425. The facility is owned by Dunne Manning Realty LP and operated by Eagle Valero GWCU; however, the system is managed by contractors from Synergy Environmental Inc. ("Synergy").

The treatment system is located inside of a small trailer on the property and is maintained twice a month during regular business hours, with additional visits occurring on an as- needed basis. Synergy has five employees that are trained to maintain the system, and typically only one or two employees would be needed to conduct the regularly scheduled operation and maintenance checks. There is a telemetry system installed onsite to alert site personnel if any issues occur.

The treatment system was installed to treat groundwater contaminated by no. 2 fuel oil in 2005. Groundwater is collected from the area of the release and pumped up through one of three wells before passing through an oil-water separator. With gravity, water flows into a storage tank before entering through two bag filters and two carbon filters. Air is injected with a Mazzi air injector before being discharged to a nearby storm sewer drain, Outfall 001, which discharges to an unnamed tributary to Pickering Creek.

At the time of the inspection, the system was offline, and all pumps had been temporarily removed. To turn the system back on, the facility representative stated that the pumps could be reinstalled, and up and running within a few days. The facility representative stated that the system has been shut down since April 2023 to address compliance issues. The facility would like to shut down the system but would need to continue sampling until there is confirmation that the groundwater is no longer contaminated at the site. The system was also temporarily shut down from September 2021 to May 2022 to address compliance issues.

II. Facility Activity and Walkthrough

As part of the inspection process, the EPA Inspection Team visually observed the facility conditions in the presence of the facility representative. The primary purpose of the inspection was to assist EPA in assessing the facility's compliance with Permit requirements.

The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Shane McAleer of EPA, and are provided in Attachment B, Photograph Log. Documents used to support the observations in this report are included in Attachment C, Exhibit Log.

The EPA Inspection Team began the walk-through by entering the 8ft by 16ft box trailer on the property (refer to Attachment B, Photographs 001 – 003). There are three groundwater well pumps that bring water into the system (refer to Attachment B, Photographs 007 – 008). Since the system was offline at the time of the inspection, the pumps were removed and stored in a bag within the trailer.

The system operated on a continual, 24/7 basis with shutdowns occurring during system maintenance. The well pumps are controlled by a float switch making the pump work on and off based on the water level in the well, and the discharge from the system was in a batch fashion controlled by floats in the equalization tank. When water reached a certain level in the tank, the system would discharge until the water level reached the low float level. Water enters the system through the "manifold" (refer to Attachment B, Photograph 004). Next, water goes through the oil-water separator (refer to Attachment B, Photographs 005 – 006 and 011 – 012). The oil-water separator is cleaned out as needed, and waste from the oil-water separator is stored in a drum outside of the trailer for disposal (refer to Attachment B, Photographs 021 – 022).

Water is then gravity fed into a 130-gallon equalization tank for settling (refer to Attachment B, Photographs 009 – 010). A pump transfers water to the bag filter system (refer to Attachment B, Photograph 013). There are two bag filter housing units, and the facility recently changed the bag filter size from 25 µm to 5 µm in December 2022. Bag filters are replaced two times a month by Synergy as well. Next, there are two carbon filter units (refer to Attachment B, Photographs 015 – 017) before reaching the air injection point (refer to Attachment B, Photograph 018). The final effluent is discharged to a nearby storm sewer drain, which ultimately discharges to an unnamed tributary to Pickering Creek (refer to Attachment B, Photographs 024 – 026). The effluent sampling point can be observed inside the trailer as well (refer to Attachment B, Photograph 019).

III. Observations

The inspection observations below are made pursuant to the requirements of the Permit.

NPDES Permit Effluent Exceedances

Part A.1.A of the Permit defines effluent discharge limitations, monitoring, and reporting requirements for Outfall No. 001:

“Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply.”

Observation 1. According to ECHO effluent data, Eagle Valero has had 56 effluent violations between December 2020 and April 2023 (refer to Table 3). The facility representative explained that since they could not meet effluent limits, the system was shut down in April of 2023. The facility representative explained that they would like to eventually terminate their permit.

Table 3: Effluent Violations from December 2020 to April 2023

Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Unit	% Exceedance
12/31/2020	pH	INST MIN	5.49	SU	6	SU	-
12/31/2020	Solids, total suspended	MO AVG	7.9	mg/L	5	mg/L	58
12/31/2020	Iron, dissolved (as Fe)	DAILY MX	5.4	mg/L	0.3	mg/L	1700
12/31/2020	Iron, dissolved (as Fe)	MO AVG	3.8	mg/L	0.3	mg/L	1167
1/31/2021	Iron, dissolved (as Fe)	DAILY MX	5.2	mg/L	0.3	mg/L	1633
1/31/2021	Iron, dissolved (as Fe)	MO AVG	2.6	mg/L	0.3	mg/L	767
1/31/2021	Benzene	DAILY MX	0.00074	mg/L	0.0005	mg/L	48
3/31/2021	Solids, total suspended	DAILY MX	12	mg/L	10	mg/L	20
3/31/2021	Solids, total suspended	MO AVG	12	mg/L	5	mg/L	140
6/30/2021	Oxygen, dissolved (DO)	INST MIN	5.7	mg/L	6	mg/L	5

7/31/2021	Solids, total suspended	MO AVG	7.5	mg/L	5	mg/L	50
8/31/2021	Solids, total suspended	DAILY MX	11	mg/L	10	mg/L	10
8/31/2021	Solids, total suspended	MO AVG	9.5	mg/L	5	mg/L	90
9/30/2021	Solids, total suspended	MO AVG	8	mg/L	5	mg/L	60
9/30/2021	Solids, total suspended	DAILY MX	16	mg/L	10	mg/L	60
9/30/2021	Oil & grease	DAILY MX	15	mg/L	10	mg/L	50
9/30/2021	Iron, dissolved (as Fe)	DAILY MX	5.9	mg/L	0.3	mg/L	1867
9/30/2021	Iron, dissolved (as Fe)	MO AVG	2.98	mg/L	0.3	mg/L	893
6/30/2022	Solids, total suspended	DAILY MX	50	mg/L	10	mg/L	400
7/31/2022	Solids, total suspended	MO AVG	6.9	mg/L	5	mg/L	38
7/31/2022	Benzene	DAILY MX	0.0007	mg/L	0.0005	mg/L	40
7/31/2022	Benzene	MO AVG	0.00066	mg/L	0.0005	mg/L	32
8/31/2022	Solids, total suspended	MO AVG	25	mg/L	5	mg/L	400
8/31/2022	Solids, total suspended	DAILY MX	29	mg/L	10	mg/L	190
8/31/2022	Iron, dissolved (as Fe)	DAILY MX	0.322	mg/L	0.3	mg/L	7
8/31/2022	Benzene	DAILY MX	0.00056	mg/L	0.0005	mg/L	12
9/30/2022	Solids, total suspended	MO AVG	12.5	mg/L	5	mg/L	150
9/30/2022	Solids, total suspended	DAILY MX	15	mg/L	10	mg/L	50
9/30/2022	Iron, dissolved (as Fe)	DAILY MX	7.79	mg/L	0.3	mg/L	2497
9/30/2022	Iron, dissolved (as Fe)	MO AVG	5.475	mg/L	0.3	mg/L	1725
10/31/2022	Solids, total suspended	MO AVG	23.5	mg/L	5	mg/L	370

10/31/2022	Solids, total suspended	DAILY MX	30	mg/L	10	mg/L	200
10/31/2022	Iron, dissolved (as Fe)	DAILY MX	20.6	mg/L	0.3	mg/L	6767
10/31/2022	Iron, dissolved (as Fe)	MO AVG	10.97	mg/L	0.3	mg/L	3557
11/30/2022	Solids, total suspended	DAILY MX	11	mg/L	10	mg/L	10
11/30/2022	Solids, total suspended	MO AVG	9.65	mg/L	5	mg/L	93
11/30/2022	Iron, dissolved (as Fe)	DAILY MX	9.89	mg/L	0.3	mg/L	3197
11/30/2022	Iron, dissolved (as Fe)	MO AVG	9.865	mg/L	0.3	mg/L	3188
12/31/2022	Solids, total suspended	DAILY MX	25	mg/L	10	mg/L	150
12/31/2022	Solids, total suspended	MO AVG	16.5	mg/L	5	mg/L	230
12/31/2022	Iron, dissolved (as Fe)	DAILY MX	3.46	mg/L	0.3	mg/L	1053
12/31/2022	Iron, dissolved (as Fe)	MO AVG	3.27	mg/L	0.3	mg/L	990
12/31/2022	Benzene	DAILY MX	0.00063	mg/L	0.0005	mg/L	26
1/31/2023	Solids, total suspended	DAILY MX	39	mg/L	10	mg/L	290
1/31/2023	Solids, total suspended	MO AVG	19.5	mg/L	5	mg/L	290
1/31/2023	Iron, dissolved (as Fe)	MO AVG	1.79	mg/L	0.3	mg/L	497
1/31/2023	Iron, dissolved (as Fe)	DAILY MX	3.46	mg/L	0.3	mg/L	1053
1/31/2023	Benzene	DAILY MX	0.00085	mg/L	0.0005	mg/L	70
2/28/2023	Solids, total suspended	MO AVG	6.05	mg/L	5	mg/L	21
2/28/2023	Iron, dissolved (as Fe)	MO AVG	3.934	mg/L	0.3	mg/L	1211
2/28/2023	Iron, dissolved (as Fe)	DAILY MX	7.05	mg/L	0.3	mg/L	2250
3/31/2023	Iron, dissolved (as Fe)	MO AVG	1.3518	mg/L	0.3	mg/L	351

3/31/2023	Iron, dissolved (as Fe)	DAILY MX	2.63	mg/L	0.3	mg/L	777
4/30/2023	Solids, total suspended	MO AVG	7.55	mg/L	5	mg/L	51
4/30/2023	Iron, dissolved (as Fe)	MO AVG	7.885	mg/L	0.3	mg/L	2528
4/30/2023	Iron, dissolved (as Fe)	DAILY MX	7.97	mg/L	0.3	mg/L	2557

IV. Records Review

The EPA Inspection Team reviewed documentation including: eDMR reports, operation and maintenance records, most recent Self- Inspection Reports, and flow records. Documents were sent to the EPA Inspection Team after the inspection and received on September 27, 2023 and October 11, 2023. A copy of these attachments is provided under Attachment C, Exhibit Log.

V. Closing Conference

After the facility walk, the EPA Inspection Team met with the facility representative for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team reiterated to the facility representative 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 11:15 AM.

VI. List of Attachments

Attachment A: Permit No. PA0245119

Attachment B: Photograph Log

Attachment C: Exhibit Log

Exhibit 1: Discharge Monitoring Reports 2021 to 2023

Exhibit 2: Operation and Maintenance Records

Exhibit 3: Sampling and System Readings

Exhibit 4: Flow Table