



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 3**  
**Four Penn Center**  
**1600 JFK Blvd.**  
**Philadelphia, Pennsylvania 19103-2029**

**Report Title:** Clean Water Act Compliance Inspection Report  
**Inspection Date(s):** 06/25/2024  
**Regulatory Program(s):** National Pollutant Discharge Elimination System (NPDES)  
**Type of Activity:** Wastewater  
**Facility Name:** Kettle Creek STP  
**Permittee(s):** Pennsylvania Department of Conservation and Natural Resources ("PA DCNR")  
**Facility Operator:** PA DCNR  
**Facility Address:** 97 Kettle Creek Park Lane  
Renovo, PA 17764  
**Latitude:** 41.3752 **Longitude:** -77.9327  
**County/Parish:** Clinton  
**Permit Number:** PA0228860  
**NAICS Code:** 721211 **SIC:** 7033  
**DSB ID#:** ECAD - 5494

| <b>Facility Representative(s):</b>               | <b>Point of Contact</b>             |
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|                        |                                |      |
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| <b>Report Preparer</b> | Angela Weisel, NPDES Section 1 | Date |
| <b>Signature/Date</b>  |                                |      |

|                       |                                     |      |
|-----------------------|-------------------------------------|------|
| <b>Supervisor</b>     | Mark Zolandz, NPDES Section 1 Chief | Date |
| <b>Signature/Date</b> |                                     |      |

Unique Project#: ECAD - 5494

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## I. Introduction

On June 25, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region 3 (hereinafter, “EPA Inspection Team”) conducted a Wastewater Inspection of the Kettle Creek State Park facility (hereinafter, “the facility”). 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. PA0228860 (hereinafter, the “Permit”) and applicable State and Federal regulations.

### A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 8:00 AM for the inspection. Inspectors met with the following facility representatives:

**Table 1: Inspection Attendee List**

| Name                                           | Affiliation   | Telephone    | Email                     |
|------------------------------------------------|---------------|--------------|---------------------------|
| <b>EPA Region 3 Inspectors and Contractors</b> |               |              |                           |
| Angela Weisel                                  | EPA Inspector | 215-814-2124 | Weisel.angela@epa.gov     |
| Johannah Jacobson                              | EPA Inspector | 215-814-2318 | Jacobson.johannah@epa.gov |
| <b>Facility Representatives</b>                |               |              |                           |
| Robert Grenell                                 | PA DCNR       | 570-923-6004 | rgrenell@pa.gov           |
| William Shinn                                  | PA DCNR       | 814-203-2460 | wshinn@pa.gov             |
| Nick Selner                                    | PA DCNR       | 814-999-3851 | nselner@pa.gov            |
| Stephanie Countess                             | PA DCNR       | 717-783-3329 | scountess@pa.gov          |

The EPA Inspection Team displayed their credentials to Robert Grenell 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 Robert Grenell 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 sunny. 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) <sup>1</sup> |
|----------------------------------------|-----------|--------------------------------------------|
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/20/2024 | 0.00                                       |
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/21/2024 | 0.00                                       |
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/22/2024 | 0.00                                       |
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/23/2024 | 0.00                                       |
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/24/2024 | 0.00                                       |
| US1PAMT0090, GREEN LANE 0.9 ESE, PA US | 6/25/2024 | 0.00                                       |

### C. Summary of the Facility

The facility treats wastewater from the Kettle Creek State Park campsite shower house. The campground services 63 campsites and closes in the winter. The open season for the campsites is based off of the hunting and fishing seasons established by the Commonwealth of Pennsylvania and is typically April through December. The wastewater treatment plant's average flow is about 1,000 gallons per week, and 3,000 gallons per week during a busy holiday weekend.

The facility is operated by the Pennsylvania Department of Conservation and Natural Resources ("PA DCNR") 5 days a week from approximately 8 AM to 4 PM. There is one operator onsite daily, and a seasonal operator that comes on the weekend.

## II. Facility Activity and Walkthrough

During the inspection, the EPA Inspection Team visually observed the facility conditions in the presence of the facility representative. Inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Johannah Jacobson, and are provided in Attachment B.

Influent enters the wastewater treatment system via a gravity pump from the campground shower house. From there, waste travels through a grinder pit before entering an equalization tank ("EQ tank") (refer to Attachment B, Photographs 001 and 002). The EQ tank has a high and low level valve (refer to Attachment B, Photograph 003), that will turn the plant on after the water level has reached 9 feet. If the level does not reach 9 feet, the wastewater treatment

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<sup>1</sup> Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

system does not operate. Facility representatives stated that the average water level stays around 9 feet, so the plant is usually operating.

From the EQ tank, waste flows to the clarifier and then to the aeration tank (refer to Attachment B, Photographs 005 and 006). The aeration tank is continuously running (refer to Attachment B, Photograph 004). Next, waste flows to the mudwell or back wash tank (refer to Attachment B, Photograph 007). Solids from the filters are either returned to the mudwell or hauled out as needed (refer to Attachment B, Photograph 008). Sludge is typically hauled at the end of the season before the treatment plant closes in December.

The filters are cleaned on Monday and Friday mornings. From the filters, waste flows to the clear well (refer to Attachment B, Photograph 009) before the UV light pit (refer to Attachment B, Photographs 010 through 012). Photograph 011 shows the sample point within the UV light pit where grab samples are taken by the facility. Effluent discharges through the discharge pipe that is submerged in Kettle Creek (refer to Attachment B, Photograph 021).

Facility representatives stated that they add chlorine, soda ash, or alum as needed. The chemical additives were stored inside the treatment building (refer to Attachment B, Photograph 019).

Following the tour of the wastewater treatment system, the EPA Inspection Team observed the conditions of the onsite lab at the time of the inspection. Operators are responsible for analyzing pH, dissolved oxygen, and total residual chlorine. Fecal coliform samples are analyzed at the White Oak Lab in Ridgway, PA. All other parameters are analyzed by the PA DEP Laboratories in Harrisburg, PA. The EPA Inspection Team was able to observe the daily sampling logs for May and June, the pH probe calibration log, and the buffers used for calibration (refer to Attachment B, Photographs 015 through 020).

### **III. Observations**

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

#### **Effluent Limitations, Monitoring, Recordkeeping and Reporting Requirements**

Part A.I.A.2 states that for Outfall 001, “the following effluent limitations and monitoring requirements apply.”

**Observation 1:** DMR’s submitted by the facility were reviewed by the EPA Inspection Team. The following exceedances were reported by the facility from June 30, 2022 through September 30, 2023 (See Table 3 below).

**Table 3. DMR Exceedances**

| Monitoring Period Date | Parameter Description           | Statistical Base Type | DMR Value | Limit Value | Value Unit | % Exceedance |
|------------------------|---------------------------------|-----------------------|-----------|-------------|------------|--------------|
| 6/30/2022              | Coliform, fecal general         | INST MAX              | 2419.6    | 1000        | #/100mL    | 142          |
| 9/30/2022              | pH                              | INST MIN              | 4         | 6           | SU         |              |
| 11/30/2022             | Solids, total suspended         | MO AVG                | 45        | 30          | mg/L       | 50           |
| 5/31/2023              | Solids, total suspended         | MO AVG                | 31        | 30          | mg/L       | 3            |
| 5/31/2023              | Coliform, fecal general         | GEO MEAN              | 2420      | 200         | #/100mL    | 1110         |
| 5/31/2023              | Coliform, fecal general         | INST MAX              | 2419.6    | 1000        | #/100mL    | 142          |
| 5/31/2023              | BOD, carbonaceous, 05 day, 20 C | MO AVG                | 35        | 25          | mg/L       | 40           |
| 7/31/2023              | BOD, carbonaceous, 05 day, 20 C | MO AVG                | 28.9      | 25          | mg/L       | 16           |
| 9/30/2023              | Coliform, fecal general         | INST MAX              | 2420      | 1000        | #/100mL    | 142          |

Facility representatives explained that the source of the fecal coliform exceedances were from a clogged UV light trap. Sludge had built up around the traps, leading to effluent exceedances. The facility was able to clean the light traps and developed a maintenance schedule to ensure similar issues will not arise again. The UV light traps are cleaned once a month.

**Observation 2:** The facility did not sample for *E. Coli* for the 2022 monitoring period. The facility is required to grab one sample per year.

#### **IV. Records Review**

During the opening conference, the EPA Inspection Team reviewed documentation including: pH calibration logs, May and June 2024 daily sampling logs, and the Operation and Maintenance manual. The 2023 Operation and Maintenance Log, and recent lab analytical results were sent to the EPA Inspection Team and received on July 11, 2024. Copies of the referenced documents are provided under Attachment C.

#### **V. Closing Conference**

After the facility walk, the EPA Inspection Team met with the facility representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the facility. The EPA Inspection Team 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 9:00 AM.

**VI. List of Attachments**

- A. Permit
- B. Photograph Log
- C. Exhibit Log
  - 1. Operation and Maintenance Log
  - 2. Recent Lab Analytical Reports