



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F Kennedy Boulevard
Four Penn Center
Philadelphia, Pennsylvania 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 08/11/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment – Industrial User Inspection
Facility Name: TE Connectivity
Permittee(s): TE Connectivity
Facility Operator: TE Connectivity
Facility Address: 627 N GRANT ST, WAYNESBORO, PA 17268
Lat/Long: 39.764214/-77.577429
County/Parish: Franklin
Permit Number: PAP120621
NAICS & SIC Codes: 334513/3625
Unique Project #: 3E22WN037A

Facility Representative(s): Edward Jones – Senior Operations Leader – TE Connectivity
Phone: (717) 762-9186 Email: ejones@te.com
Point of Contact ☒

EPA Inspectors:
Aaron Thomson - EPA Inspector (3ED13)
Phone: 215-814-2116 Email: Thomson.aaron@epa.gov

Report Preparer _____
Signature/Date Aaron Thomson (3ED13) Date
Four Penn Center
Philadelphia, Pennsylvania 19103

Supervisor _____
Signature/Date Zelma Maldonado, Acting Chief, ES Section Date
Four Penn Center
Philadelphia, Pennsylvania 19103

Table of Contents

I. Introduction	3
A. Inspection Opening Conference	3
B. Weather and Precipitation Conditions.....	3
II. Facility Activity/Walkthrough	3
III. Observations	5
IV. Records Review	10
V. Closing Conference.....	11
VI. List of Attachments.....	11

I. Introduction

On August 11, 2022, Aaron Thomson (hereinafter, “Inspector Thomson” and/or “EPA Inspector”) an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III conducted an on-site inspection of the TE Connectivity facility in Waynesboro, PA (hereinafter, “TE” and/or “the facility”)’s pretreatment program. The facility is a manufacturing plant, producing electronic leads and related hand tools. The facility is located at 627 North Grant Street, Waynesboro, PA 17268. TE provided a letter from EPA, dated June 7, 2000, (**Attachments 1 and 2**) stating, amongst other things, that regarding the facility, EPA is the controlling authority (Waynesboro does not have an EPA-approved pre-treatment program). The aforementioned letter also includes discharge and monitoring requirements. TE also provided a document (**Attachment 3**) with two letters from the Borough of Waynesboro, the earliest letter dated November 10, 2006 stating “...the Waynesboro Borough Authority and Waynesboro Borough Council will permit Tyco Electronics (now known as TE) to discharge wastewater into the Borough’s sanitary sewer system...” The other letter in **Attachment 3**, dated June 22, 2010, confirms that “none of the discharge parameters for the Tyco facility have changed.” According to facility representative Mr. Brad Rine, this (**Attachment 3**) is the most up-to-date document related to the control mechanism. The purpose of the inspection was to observe the program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The Pennsylvania Department of Environmental Protection was invited to the inspection but chose not to attend.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at est. 11:00 AM for the on-site inspection. Inspector Thomson met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA - Philadelphia	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Brad Rine	TE	(717) 762-9186	Brad.rine@te.com

Inspector Thomson displayed his credentials to Mr. Rine at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspector informed Mr. Rine 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, the weather was sunny with a high of 83 degrees Fahrenheit.

II. Facility Activity/Walkthrough

The facility is classified as a Categorical Industrial User (CIU), specifically, Metal Finishing Category which is subject to the Federal Pretreatment Regulations 40 CFR Part 403 and Categorical Industrial User Regulations 40 CFR Part 433.15 (**Attachment 1**). The facility discharges to the Waynesboro Borough publicly owned treatment works (POTW). Because the facility discharges into a POTW without an approved pretreatment program, EPA is designated as the Control Authority, and as such is the authority for inspections per 40 CFR Part 403.3(f).

The TE connectivity facility is an electronic lead manufacturing plant. The facility's manufacturing processes that contribute to the wastewater stream discharged to the sewage system includes process wastewater generated from their "blackening" process and collected overflow/wash down from chemical baths. See below for a current flow chart of the manufacturing process contributing to the wastewater stream:

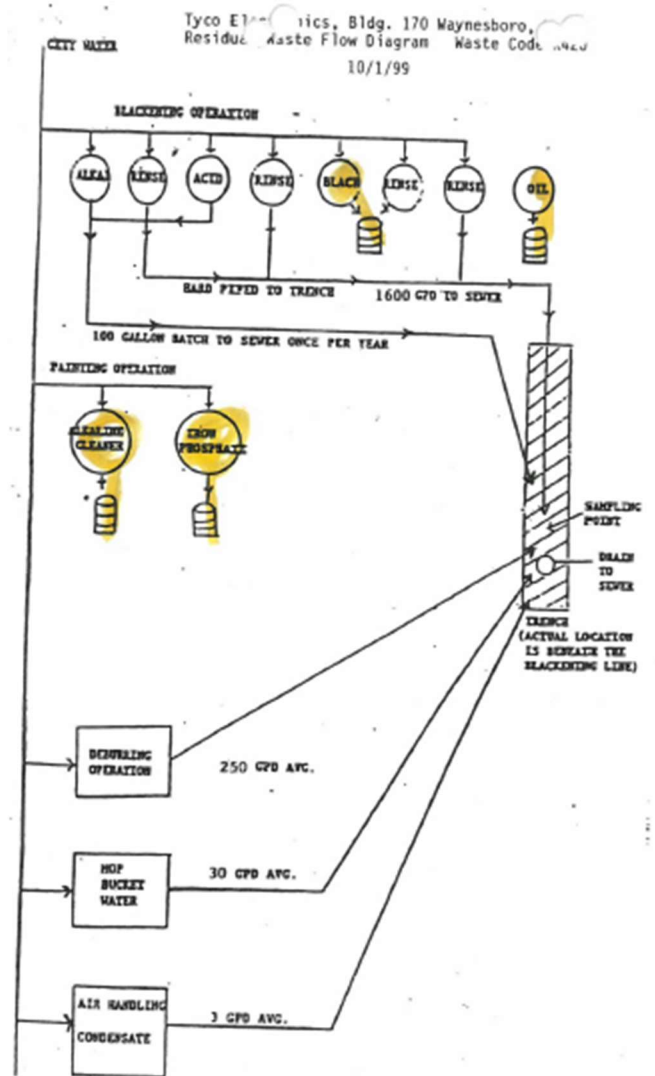


Figure 1: Facility Wastewater Flow Diagram

After the opening conference, Mr. Rine led a tour of the processes that contribute to the wastewater discharge to the sewage system. These processes includes wastewater generated from the water rinse baths and chemical bath overflow in the blackening process line, non-contact cooling water from heat treatment, air conditioner condensate, wastewater generated during their deburring operation and wash down/mop water. Troughs are installed at each of these points to collect the generated wastewater, entering a collection pit where it is then discharged to sewage system. Inspector Thomson was led to the facility's chemical bath site (**Attachment 4 Photograph 1**), equipped with troughs to collect any spillage. Mr. Rine stated that wastewater generated in the water rinse baths have their pH measured before being discharged to the collection drain/sewage system to

ensure the pH is within their permitted parameters. Inspection Thomson asked if any treatment occurs to any wastewater before it is discharged, and Mr. Rine said it is not. Next, Inspector Thomson was led to the collection pit (**Attachment 4 Photograph 2**), which includes the discharge point, where wastewater is collected and enters a drain to the sewage system (**Attachment 4 Photograph 3**). Located at/on top of the collection pit, Inspector Thomson was then led to the facility's sampling location, including composite sampler, (**Attachment 4 Photograph 4**). Inspector Thomson was then led to a supply closet nearby where he observed a monthly pH log and pH buffers that were not expired according to their labeled expiration dates. Inspector Thomson asked Mr. Rine if there was a shut-off valve installed at the collection pit to prevent discharge in the case of slug/spill; Mr. Rine said he was unaware of any such valve installed. Inspector Thomson asked Mr. Rine how the remaining chemical baths are treated if the contents become unusable, Mr. Rine stated that they would be collected in barrels and hauled off-site for treatment, but was unsure of what third-party company would be contracted by the facility. This concluded the site tour. It may be noted that wastewater generation and treatment information provided by the facility after the inspection (**Attachment 10**) shows that an oil-water separator is installed on air compressors, however, the oil-water separator was not observed by the EPA Inspector during the inspection. That same document shows chemical drums filled with "flammable/oils" being collected and shipped off-site, but does not specify the contractor used.

III. Observations

A checklist was utilized during the review and is provided below. The checklist is divided into sections, with Observations listed under each section. Photographs were taken during the inspection by Inspector Aaron Thomson, and are provided in **Attachment 2**. Not all photographs taken during the inspection are included in this report.

Visual Observations pertaining to each section are listed at the end of each section.

Section 1.				
General Information				
	Yes	No	N/A	Comments
General Description of Processes and Products	Electronic leads			
Are there any alternates to effluent monitoring conducted? (e.g., TTO/TOMP, Waiver requirements?) Describe in comments if "yes"	☒	☐	☐	Total Toxic Organics monitoring required
Provide production rates for all processes subject to production based standards and include:	n/a			
1) Process				
2) production rate used for calculating limits				
3) production rate for last 12 months				
Any anticipated changes in processes or production rates?	☐	☐	☒	
List the production rate listed on the approval letter				
Shift information, list				
1) Shift #				
2) No. of Employees				

3) Hours				
4) Work Days				
Is production seasonal? If yes, describe	☐	☐	☒	
List all visual observations pertaining to this section				

Section 2.				
Categorical Industry				
	Yes	No	N/A	Comments
Categorical Industry?	☒	☐	☐	
Category(s):	40 CFR Part 433.15,			
Subcategory(s):	Subpart A: Metal Finishing.			
Regulatory New Source Date:				
New source?	☐	☒	☐	
List of categorical processes	Blackening process, other chem bath overflow			
List of other operations producing wastewater	Rinse/wash			
List all visual observations pertaining to this section				

Section 3.				
Characterization of Wastewater Discharges (CFR 433.15)				
	Yes	No	N/A	Comments
Describe the time of day discharge to sewer occurs	Continuously			
Are discharges seasonal (if yes, describe)	☐	☒	☐	
Attach a block flow diagram of manufacturing process in the Facility Activity section of the inspection report, including: chemical storage area, and wastewater generated. Identify all regulated, unregulated and dillution wastewater discharges. Include sample location, discharge flow rates and method of disposal*. Note any recent changes. *disposal method CD - Continuous discharge to sanitary ND - Not discharged or disposed BD - Batch discharge to sanitary sewer HH - Hauled as hazardous waste OD - Other disposal - not to sanitary sewer HW - Hauled as nonhazardous waste				
List all visual observations pertaining to this section				

Section 4.				
Pretreatment Facility				
	Yes	No	N/A	Comments

Pretreatment installed?	☒	☒	☐	Consists of scheduled sampling/measuring parameters as discharged, no treatment claimed by Mr. Rine, but Attachment 10 shows oil/water separator
Attach a schematic of the pretreatment facility in the Facility Activity section of the inspection report (include all units and sludge storage)				
Briefly describe treatment processes and operation.	Oil/water separator			
Describe sludge storage and disposal method	stored in chemical drums and hauled off-site			
Describe appearance of effluent at time of inspection.	n/a			
List all visual observations pertaining to this section	monitoring to verify that no [further] treatment is necessary			

Section 5.				
Self Monitoring				
	Yes	No	N/A	Comments
Does facility have a sampling plan or protocol including use of 40 C.F.R. Part 136 techniques (obtain copy)?	☒	☐	☐	Attachment 6
Is sampling location (identified on block flow diagram) the same as in control mechanism? If no, explain.	☒	☐	☐	
Is this sampling location permanently identified by a sign, painted number, or other means?	☒	☐	☐	
Is this sampling location appropriate? If no, explain...	☒	☐	☐	
Is this sampling location shown on the chain of custody form?	☒	☐	☐	Attachments 7-9 Chain of Custody (CoC)
Are any parameters monitored by approved methods more frequently than required at permitted sampling location?.	☐	☒	☐	
If yes to previous question, are all results submitted to the control authority?	☒	☐	☐	If they were sampled above frequency, all would be reported
Does facility resample and report within 30 days of discovering a violation?	☒	☐	☐	
Are sampling records maintained on site? Describe for how long.	☒	☐	☐	3 years+
Is flow determined as required by permit?	☒	☐	☐	
How is flow determined (i.e., estimated or measured)?	Measured continuously (meter)			
Is flow measurement appropriate?	☒	☐	☐	
Is flow measurement device calibrated?	☒	☐	☐	No info on who calibrates
Does the facility have an operator's manual for its pH meters?	☒	☐	☐	

Does the facility do a proper 2-point calibration of its pH meter in accordance with the operator's manual?	☒	☐	☐	
Is other monitoring equipment (e.g. DO meter) calibrated? Describe how often if yes.	☒	☐	☐	Monthly/when used
Is sampling and analysis done in-house or by contract? If by contract, list company.	☐	☐	☐	Contract, ALS environmental
Is QA/QC program for sampling and analysis adequate? Obtain copy of plan if available.	☐	☐	☒	ALS
List all visual observations pertaining to this section				

Section 6.				
Hazardous Waste Management				
	Yes	No	N/A	Comments
Is IU aware of RCRA regulations?	☒	☐	☐	
Does facility generate any hazardous waste? If yes, indicate type of waste, method of management on site and means of disposal on a separate sheet. Describe any spillage problems or any other releases that are observed.	☐	☒	☐	
Has facility notified POTW and EPA of any hazardous waste discharges to the sewer?	☐	☒	☐	
List all visual observations pertaining to this section				

Section 7.				
Spill Prevention				
	Yes	No	N/A	Comments
Has the facility had any spills or been responsible for slug loads? List dates of events in comments.	☐	☒	☐	
If yes to previous question, was POTW notified?	☐	☐	☒	
Does the facility have spill notification procedures posted?	☒	☐	☐	
Has the facility evaluated its need for a spill prevention plan at least every two years?	☒	☐	☐	
If yes to previous question, was it determined that they needed one?	☒	☐	☐	Attachment 5
Does the IU have a spill prevention (SP) plan to address spills to the POTW?	☒	☐	☐	Attachment 5 1.1.2
If spills occurred- Did the IU follow procedures outlined in the spill plan at the time of spills?	☐	☐	☒	
If spills occurred- Were procedures effective in containing the spill?	☐	☐	☒	
Is the facility keeping records of spill events?	☐	☐	☒	
Have there been any changes in spill procedures recently. Describe if yes.	☐	☒	☐	

List all visual observations pertaining to this section	
--	--

Section 8.				
Recordkeeping Review.				
	Yes	No	N/A	Comments
Current IU control mechanism (through EPA, not a permit)	Attachment 1			
Notices and correspondence with control authority including:				
a. Self monitoring report transmittals?	☒	☐	☐	Self-monitoring reports (Attachments 7-9) received by facility from ALS are sent control authority
b. BMR if required?	☐	☐	☒	
c. Other?	☐	☐	☐	
Do sampling records include:				
a. Date of sampling event?	☒	☐	☐	Chain of Custody (Attachment 7-9)
b. Time of sampling event?	☒	☐	☐	CoC
c. Name of sampling person and affiliation?	☒	☐	☐	CoC
d. Sample collection method?	☒	☐	☐	CoC
e. Method of sample preservation?	☒	☐	☐	CoC
f. Description of sample location?	☒	☐	☐	CoC
g. Name of person conduction analysis?	☒	☐	☐	CoC
h. Date of analysis?	☒	☐	☐	CoC
i. Time of analysis, if applicable (i.e., BOD, Cr?)	☒	☐	☐	CoC
j. Sample analyses method?	☒	☐	☐	CoC shows requested method, analysis results (Attachment 7-9) show method used
Is type of sample specified in control mechanism?	☒	☐	☐	CoC 3
Are all parameters monitored at the required frequency? Note any discrepancies in comments.	☒	☐	☐	
Analytical results?	☒	☐	☐	Analysis (Attachments 7-9)
Are all monitoring results sent to the Control Authority?	☒	☐	☐	
Are copies sent to the POTW?	☐	☐	☐	
Appropriate production records for production-based standards?	☐	☐	☒	unknown
Documentation of flow rates and volumes?	☒	☐	☐	
Are records maintained at least 3 years?	☒	☐	☐	
List all visual observations pertaining to this section				

Section 9.				
EPA Sampling				
	Yes	No	N/A	Comments
Were samples taken?	☐	☒	☐	
Describe sampling location, method, and time:				
List all visual observations pertaining to this section				

Section 10.				
Stormwater				
	Yes	No	N/A	Comments
Does facility have a stormwater permit?	☐	☐	☒	
If yes, describe what type of permit along with issuance and expiration dates	Outside of scope			
Does facility have a stormwater pollution prevention plan?	☐	☐	☒	
Describe any BMPs that the facility is currently implementing.				
List all visual observations pertaining to this section				

Section 11.				
Current Compliance Status				
	Yes	No	N/A	Comments
Indicate compliance with:				
a. effluent limits (indicate in comments the date range reviewed)	☒	☐	☐	Attachment 7 (6/30/20), Attachment 8 (7/20-12/20) Attachment 9 (5/20/21)
b. monitoring (indicate in comments the date range reviewed)	☒	☐	☐	
c. recordkeeping/reporting (indicate in comments the date range and records reviewed)	☒	☐	☐	
List all visual observations pertaining to this section				

IV. Records Review

As part of the inspection, Inspector Thomson requested the following documentation be sent via email up to two weeks after the inspection: Control mechanism, categorical status, 2 years of monitoring reports, slug/spill prevention plan and process flow diagrams relating to the pretreatment system. Inspector Thomson sent a file request via “go anywhere” to Mr. Edward Jones, Senior Operations Leader, who responded with the requested documents between two messages, sent 9/13/22 and 9/15/22.

V. Closing Conference

After the facility inspection, the EPA Inspector 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 2:00 PM

VI. List of Attachments

- Attachment 1.** TE-Waynesboro_Discharge Limits-Monitoring Requirement_6-00_S
- Attachment 2.** EPA Conditions
- Attachment 3.** Wastewater Discharge Permit Correspondence
- Attachment 4.** Photo Log
- Attachment 5.** Integrated Contingency Plan
- Attachment 6.** Sampling Plan Regulated Procedure
- Attachment 8.** ALS Water sample 2020
- Attachment 9.** ALS WasteWater analysis FY21 January-June
- Attachment 10.** Table for process wastewater sources conveyance and discharge points.2016