UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F. Kennedy Blvd.
Philadelphia, Pennsylvania 19103

Report Title:	Clean Water Act Compliance Inspections Report		
Inspection Date(s):	05/04/2023		
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)		
Type of Activity:	Wastewater		
Facility Name:	Corry City Municipal Authority Erie County		
Permittee(s):	City of Corry		
Facility Address:	Corry Wastewater Treatment Plant 100 Sciota St., Corry, PA 16407		
Latitude:	41.9272	**Longitude:**	-79.62921
Permit Number:	PA0028223		
NAICS:	221320	**SIC:**	4952
Receiving Waters:	Hare Creek		
Unique Project #:	3E23WN079A		

Facility Representative(s):

John Nordland, Chief Operator
Phone: (814) 462-0268 Email: jnordland@corrypa.gov

EPA Inspector(s):

Steven Maslowski, USEPA Region 3 Email: maslowski.steven@epa.gov
Phone: (215) 814-2371

State/ Local Inspector:

Shane Krause, ECDH PADEP Email: skrause@eriecountypa.gov
Phone: (814) 460-0351 *Additional attendees listed on Page 2

Report Preparer Signature/Date — June 3, 2023
Dominic Cotton, Inspector in Training (3ED32)
U.S. EPA Region III

Supervisor Signature/Date — STACIE PRATT Digitally signed by STACIE PRATT Date: 2023.07.03 14:25:28 -04'00'
Stacie Pratt, Water Branch Chief (3ED30)
U.S. EPA Region III

Table of Contents

List of Attachments

- Appendix A – Permit
- Appendix B – Preparedness, Prevention Contingency (PPC) Plan
- Appendix C – 2022 Chapter 94 Municipal Wasteload Management Report

Exhibit Log

- Exhibit A – Photograph Log
- Exhibit B – EPA ECHO Detailed Facility Report
- Exhibit C – Stormwater Inspection Form
- Exhibit D – Training Documents
- Exhibit E – Handwritten Daily Inspection Log
- Exhibit F – Map of Collection System

I. Introduction

On May 4, 2023, inspectors from the U.S. Environmental Protection Agency (EPA) Region III (hereinafter, "EPA Inspection Team") conducted an inspection of Corry Wastewater Treatment Plant (hereinafter, "the Facility"). Representatives from Erie County Department of Health/Pennsylvania Department of Environmental Protection (ECDH/PADEP) Bureau of Clean Water and the City of Corry Public Works were also in attendance.

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. PA0028223 (hereinafter, the "Permit"), and applicable State and Federal regulations.

a. Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 7:50 AM (EDT) for the inspection. The EPA Inspection Team consisting of Steve Maslowski and Dominic Cotton met with John Nordland and John Catalfu, the Facility representatives. Steve Maslowski displayed his credentials to the Facility representatives prior to the inspection and explained the purpose of the inspection was to review compliance with the Permit. The EPA Inspection Team explained that any information that the Facility deemed to be confidential business information ("CBI") should be identified to the EPA Inspectors during the inspection and it would be handled as CBI according to EPA's CBI Procedures. Table I outlines the individuals that participated in the inspection.

Table I. Inspection Attendee List

Name	Affiliation	Contact Information
U.S. EPA Region III		
Steven Maslowski	EPA Region III - Inspector	Phone: (215) 814-2371 Email: maslowski.steven@epa.gov
Dominic Cotton	EPA Region III - Inspector in Training	Phone: (215) 814-2046 Email: cotton.dominic@epa.gov
Pennsylvania Department of Environmental Protection		
Shane Krause	Erie County Department of Health PADEP	Phone: (814) 460-0351 Email: skrause@eriecountypa.gov
City of Corry		
Mark Leofsky	City of Corry Public Works Manager	Phone: (814) 964-2301 Email: mleofsky@corrypa.gov
Facility Representative(s)		
John Nordland	Chief Operator	Phone: (814) 462-0268 Email: jnordland@corrypa.gov
John Catalfu	Corry WWTP Operator	Phone: (814) 663-2654

b. Weather and Precipitation Conditions

During the inspection, weather was overcast with scattered rain showers. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the inspection and 4 days prior are provided in Table II below:

Table II. Precipitation Data

Station Name	Date	Precipitation Amount (inches)[1]
CORRY 0.5 NNW, PA US US1PAER0018	05/01/2023	0.17
CORRY 0.5 NNW, PA US US1PAER0018	05/02/2023	0.30
CORRY 0.5 NNW, PA US US1PAER0018	05/03/2023	0.40
CORRY 0.5 NNW, PA US US1PAER0018	05/04/2023	0.03

[1]Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

c. Summary of the Facility

The Permit for the facility was originally issued on by PADEP, which became effective on December 1, 2014, and expired on November 30, 2019. The Permit was administratively extended. The Permit was amended on October 2, 2019, and the renewal application was submitted on May 31, 2019.

The Municipal Authority of the City of Corry (MACC or the Authority), which owns the Facility, has a permitted discharge of 3.5 million gallons per day (MGD) to Hare Creek. The Authority's wastewater treatment facility provides sewage treatment for a population of 6,000-8,000 amongst the City of Corry and portions of Columbus, Concord, and Wayne Townships.

The City of Corry maintains both flow monitoring and rain gauge(s) which aids in annual reporting of the volume and frequency of the Combined Sewer System (CSO) discharges. The overflow volume is measured in 15-minute increments for the following outfalls sites:

- Wright Street CSO Outfall 005
- Avenue (Ave) A CSO Outfall 002
- WWTP CSO Outfall 004

1.) The monitoring and routine maintenance of the wastewater treatment system is the shared responsibility of the WWTP staff and the City of Corry Streets Department. Responsibilities of the WWTP staff include inspecting and maintaining the sewer system pump stations, the CSOs' flow meters, and the WWTP. Each pump station and the CSO outfall at Wright Street is inspected daily, and the bar screen at Avenue A Pump Station is cleaned each day. Items checked during the daily inspection include operating time of each pump, pump intake pressures, discharge, pumped volumes, and the duration, volume, and number of CSO's. The WWTP staff also maintains the two pump stations in Wayne Township. The City of Corry Streets Department continues to maintain the conveyance system in Columbus Township.

2.) The Authority routinely accepts hauled-in septage waste. All hauled-in waste enters the wastewater treatment facility at the upstream of the influent sampling system.

3.) In March and June of 2020, the WWTP had overflows due to power loss. On both occasions an unknown amount of flow went out CSO Outfall 004. The loss of power stopped the primary clarifiers from working, flooded the grit room, and the overflow alarm did not go off because there was no electricity. The auto dialer did not work because the battery was dead. Corry corrected the power source. Thereafter, the Facility installed a new plant wide Supervisory Control and Data Acquisition (SCADA) system that will significantly improve alarm notifications.

4.) The City of Corry Engineer wants to replace the WWTP to handle the amount of wastewater coming into the facility and build a new 40 MGD oxidation ditch facility.

II. Facility Activity

As part of the inspection process, the EPA Inspection Team visually observed the Authority's municipal wastewater treatment process in the presence of the Facility's Chief Operator.

The municipal treatment process consists of:

- Bar Screen
- Grit Removal
- Influent Pumps
- Primary Clarifiers
- Rotating Biological Contactors (RBCs)
- Secondary Clarifiers
- Effluent Filters
- Chlorination
- Dechlorination

- Post Aeration
- Sludge Drying Beds

In addition to these facilities, the plant also has twin Overflow Retention Facilities (ORFs) that have a cumulative volume of 600,000 gallons. These tanks temporarily store wet weather flows from the Avenue A pump station and the excess flows from the primary effluent diversion chamber.

The Facility has three active (3) CSO Outfalls:

- Outfall 002, Latitude 41° 55' 21.00", Longitude 79° 37' 25.00" Outfall 002 at the Avenue A Pump Station located adjacent to the High School
- Outfall 004 Latitude 41° 55' 32.00", Longitude 79° 37' 44.00" Outfall 004 at the Corry WWTP
- Outfall 005 Latitude 41° 55' 31.00", Longitude 79° 38' 20.00" Wright and Smith Street intersection.

The Facility also has four (4) Stormwater Outfalls located on site:

- Outfall 003, Latitude 41° 55' 35.00", Longitude 79° 37' 40.00" Outfall 003 at the central portion of the WWTP gravity discharge
- Outfall 006 Latitude 41° 55' 35.00", Longitude 79° 37' 37.00" Outfall 006 at the discharge from the north wet well via a force main into the 48" pipe
- Outfall 007 Latitude 41° 55' 37.00", Longitude 79° 38' 41.00" Outfall 007 to the Northeastern corner of the sludge drying beds
- Outfall 008 Latitude 41° 55' 37.00", Longitude 79° 38' 42.00" Outfall 008 at the Northwestern corner of the sludge drying beds

As part of the inspection, the Facility operators explained the operation and layout of the Facility. During the inspection, Facility representatives explained the hours of operation are from 7AM-3:30PM with call in at night if issues were to occur. The Facility is run by four (4) operators.

The City of Corry has a system of combined sewers and separate sewers. A map of the collection system is presented in the Exhibit Log (Exhibit F). The Chief Operator of the Facility stated the plant takes in flow from two different interceptors, one from Avenue A and the other from Scotia Street. The Chief Operator stated the plant is hydraulically overloaded during wet weather and has problems with infiltration and inflow problems (I/I). The Facility is designed for 3.5 MGD and has a daily flow of 1.5 MGD in the summer. Facility representatives stated the plant can take up to 10 MGD before it overflows over a weir and goes out CSO Outfall 004. There are contributing municipalities that come to the plant from portions of Concord, Columbus, and Wayne Townships.

The EPA Inspection Team began their Facility walk-through at 9 am beginning at the septic hauler dump site (Exhibit A, Photos P504001/P5040002) where waste coming

from municipalities, containing organic matter, is dumped (Exhibit A, Photo P5040022).

From the septic hauler dump site, the EPA Inspection Team observed the CSO weir 004 (Exhibit A, Photos P504003/P504004).

Next, the EPA Inspection Team walked towards a building where the headworks are located. Once inside, Facility representative pointed out the influent sampler located on the floor where samples are kept (Exhibit A, Photo P5040010). The Chief Operator stated samples are analyzed by an outside lab, Fairway Laboratories, and sent out on Monday and Tuesday. The influent and effluent samplers are collected Sunday and Monday morning and are 24 hours flow proportional composite samples. The influent sampler draws a sample from the plant, just ahead of the bar screen. The effluent sampler (Exhibit A, Photo P5040067) draws a sample from the end of the dechlorination aeration phase, just prior to the effluent weir. Fecal samples are collected as grab samples that are taken at the end of dechlorination after the weir. Dissolved oxygen (DO), pH, and residual chlorine (Cl) grab samples are taken daily at the same location as the fecal samples.

Further inside the building, the EPA Inspection Team observed the headworks. The headworks consists of a channel that allows the automatic bar screen to be isolated for maintenance; the bypass channel includes a manually cleaned trash rack. Influent wastewater passes through the automatic bar screen (Exhibit A, Photos P5040015/P5040016) where solids, that may clog pumps and pipes, are removed, and discharged to a dumpster.

Downstream of the bar screen, wastewater discharges to the vortex grit chamber (Exhibit A, Photo P5040014), where heavier inorganic materials are removed, washed of organic matter, and discharged to a dumpster that are discharged to the drying beds (Exhibit A Photos P5040017/P5040018/P5040019). The wastewater discharges from the grit chamber to either of the influent pumping system's wet wells.

The influent pumping system consists of the east wet well with influent pump numbers 1,2,3 (Exhibit A, Photo P5040013) and the west wet well with influent pump numbers 4,5,6 (Exhibit A, Photo P5040012). All the pumps discharge to the primary clarifiers.

The maintenance garage contains two primary clarifiers that sit atop above the building (Exhibit A, Photos P5030023/P5040024). Solids are suspended in the wastewater, settled by gravity, and floatables are decanted from the wastewater surface in the tanks. Effluent from the primary clarifiers discharge to the primary effluent diversion structure (Exhibit A, Photo P5040025), located at the discharge (east) end of the primary clarifiers.

The primary effluent diversion structure (Exhibit A, Photo P5030025) includes three weir gates, two of which are controlled automatically, that control the discharge of primary effluent to the following locations:

- Rotating Biological Contactors (RBC)-typical flow path. All flow up to 6.5 MGD discharges to the RBCs. Controlled by manually adjustable weir gate RBCI-WG2;
- Overflow retention facility (ORF)-typical wet weather flow path for primary effluent rates between 6.5 MGD and 9.0 MGD. Controlled by automatically actuated weir gate;
- Bypass to mix final filter effluent and discharge to the chlorine contact tank-alternative wet weather flow path for primary effluent rates between 6.5 MGD and 9.0 MGD when the ORF is full. Controlled by automatically actuated weir gate BYP-WG3.

The Inspection Team continued to the overflow retention facility (ORF). The ORFs consist of two "cells," the East ORF Tank and West ORF tank (Exhibit A, Photos P5040070/P5040072), with each having a capacity to temporarily store 300,000 gallons of wet weather flow. The ORF accepts influent from the following:

- Up to 6 MGD of flow from wet weather pumping system at the Avenue A Pump Station, which discharges directly to the ORF (Exhibit A, Photo P5040073) via a dedicated 18-inch diameter force main. The wet weather pumps at the Avenue A Pump Station (Exhibit A, Photo P5040082) are activated automatically when influent to the pump station exceeds the capacity of the dry weather pumps (Exhibit A, Photo P5040083); and
- Up to 2.5 MGD of flow from the primary effluent diversion structure. When the ORF is full, the plant control system will automatically close the weir gate ORFI-WG1 and automatically divert 2.5 MGD to the line that feeds the chlorine contact tank

All ORF influent discharges to the East ORF Tank. When the East ORF Tank is nearly full, the flow is diverted to the West ORF Tank. However, as the West ORF Tank reaches capacity, wastewater will automatically overflow to the high-level overflow weir and discharge to the diversion chamber on the influent sewer. Once this occurs, the overflow will go back to the facility for full treatment, or if a high-flow event is in progress, potentially discharge to Hare Creek via Outfall 004 (Exhibit A, Photos P5040074/5040075).

The primary effluent is then discharged to the RBC influent splitter structure (Exhibit A, Photo P5040052). The RBC tanks [12 in total] (Exhibit A, Photo P5040030) removes organic from the flow and microbiological organisms that grow on the RBC media. Each RBC train includes four RBC media shafts. RBC discharge contains biological solids ("biomass") sloughed from the RBC media and inorganic matter discharged from the primary clarifiers. The RBC effluent then discharges to the secondary clarifier flow splitter structure (Exhibit A, Photo P5040065), which

apportions equal amounts of flow to each RBC train. The secondary clarifier flow splitter structure has the capability to discharge excess flow to the secondary clarifier effluent line. A Facility representative stated that the RBC's are reversed cleaned one after each other to remove biomass from the RBC media.

After the RBCs, the Inspection Team continued towards two (2) secondary [final] clarifiers where biomass and other matter settle by gravity and are periodically decanted to the plant's sludge handling system. Floatable material in the secondary clarifiers is discharged to the plant influent sewer just upstream of the headworks. Facility representative explains the final clarifiers are cleaned a couple of times of year (mainly Spring/Fall). Thereafter, the secondary clarifiers effluent discharges to the five rapid sand filters known as the final filters (Exhibit A, Photos P5040034/P5040033). At this stage, filtration is a physical treatment process that removes particulates form the flow. Final filter effluent discharges to the chlorine contact tank.

When there is a head loss in the sand filters due to accumulated solids that reaches a field-selectable setpoint, the filters backwash automatically (Exhibit A, Photo P5040033), using final filter effluent as the backwash water supply. The filter backwash wastewater discharges to either the influent wet wells or the backwash clarifier (Exhibit A, Photo P5040068). Solids that settle out by gravity in the backwash clarifier are conveyed by gravity to the treatment plant's solids handling system.

The final filter effluent is disinfected with the chlorine in the chlorine contact tank [CCT] (Exhibit A, Photo P5040028). The CCT allows the disinfectant [chlorine] to remain in contact with pathogens in the wastewater for fifteen minutes or longer, depending on the flow rate, to provide adequate pathogen kill.

The disinfectant [chlorine gas] is blended with water to create chlorine solution that is injected into the flow in the final filter effluent piping just before the flow discharges from the Main Treatment Building (Exhibit A, Photo P5040045). The objective of this process is to prevent the spread of disease to protect downstream water supplies, and protect receiving waters used for water sports and wildlife.

Excessive chlorine is toxic to aquatic flora and fauna; therefore, sulfur dioxide gas is mixed with the flow to reduce the chlorine residual in a process known as dechlorination. Also, in the final pass, the post-aeration system introduces dissolved oxygen content of the treatment plant effluent. Samples for monitoring compliance with the treatment plant's discharge permit (Exhibit A, Photo P5040067) are obtained from the end of the final pass of the CCT, after disinfection, dechlorination, and post-aeration.

The treatment plant effluent is discharged via 36-inch diameter sewer to a 48-inch diameter outfall. The outfall conveys both treated effluent and, occasionally,

combined sewer overflow discharged via CSO Outfall 004. The 48-ich diameter outfall sewer discharges to Hare Creek (Exhibit A, Photos P5040074/P5040075).

The Inspection Team observed the sludge pumps in the basement of the South Treatment Building that convey sludge to the anaerobic digestors (Exhibit A, Photo P5040061). Sludge is composed largely of the substances responsible for the offensive character of untreated wastewater and must be stabilized before land disposal and most other types of disposals. The anaerobic digestors use bacteria to treat the sludge under anoxic conditions. All sludge discharges to the primary digester and is eventually decanted to the secondary [holding] digester.

The digested sludge is pumped from the secondary digester and is conditioned with a polymer and discharge to the sludge drying beds [16 sludge drying beds] (Exhibit A, Photo P5040053), where excess water drains from the sludge though an underdrain system, and the sludge can also air dry. The sludge drying bed filtrate is discharged into the plant influent sewer for subsequent treatment. A Facility representative stated the dried sludge is removed from the sludge drying beds via tractor, placed into a dumpster, and disposed of at a landfill. Facility representative explained that Pro Waste comes to the Facility, picks up the full dumpster(s) and transfer the material to Chantaqua County Landfill. Break for Lunch

After lunch, the Inspection Team went to CSO Outfall 005 (Exhibit A, Photos P504077/P5040078) located at the City of Corry Public Works facility. The outfall is located adjacent to the maintenance yard at the facility where there is no public access because it is fenced off inside the municipal yard. The outfall has bar screens for solids and floatables and the structure is inspected every day. The screens are cleaned after each rain event.

The Inspection Team went to Avenue A Pump Station (Exhibit A, Photo P5040079). Inside the pump station, Facility representatives keep a handwritten daily log for self-inspections (Exhibit A, Photo P5040084). Also, the pump station has wet weather pumps (Exhibit A, Photo P5040082) that sends flow to the ORF and dry weather pumps (Exhibit A, Photo P5040083). When the wet well fills, the wet weather kicks on. Both pumps receive regular operation and maintenance. Lastly, the pump station has bar screens for solids and floatables (Exhibit A, Photo P5040080) and an outfall pipe that leads to the East ORF (Exhibit A, Photo P5040081). When the wet well overflows, it discharges to the East ORF. As the ORF pipe gets overwhelmed, it discharges to CSO Outfall 002.

Thereafter, the Inspection Team went to CSO Outfall 002 (Exhibit A, Photo P5040088). The outfall discharges under water into Hare Creek. The structure has solids and floatables controlled at Avenue A Pump Station and the structure has limited public access.

III. Records Review

The EPA Inspection Team conducted a records review to evaluate the Facility's compliance with the Permit. Most of the records and reports required by the Permit were available for review onsite and after the inspection. The Facility's electronic Discharge Monitoring Reports (eDMRs) were obtained electronically and reviewed offsite after the onsite inspection. The Facility had copies of majority of the reports, as well as required attachments, onsite, housed in binders or electronically scanned. The following records were reviewed:

- 2022 Annual Chapter 94 Municipal Wasteload Management Report (Exhibit C)
- Daily Self-inspection logs (located throughout the Facility and electronically scanned)
- Notice of Violation Letter(s)
- List of waste haulers septic discharges

IV. Observations

The following section summarizes the EPA Inspection Team's observations relative to the Facility's Permit requirements, including the status of certain treatment units, operational and maintenance practices, and the Facility's monitoring and reporting documentation.

Failure to Implement Preparedness, Prevention and Contingency (PPC) Plan:

Permit Requirement:

All but not limited to:

- **Part C. Section VI.B.1 of the Permit states:** "The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code § 91.34 following the guidance contained in DEP's "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (DEP ID 400-2200-001), its NPDES-specific addendum and the minimum requirements below.
    - **d.** The PPC Plan must identify areas which, due to topography or other factors, have a high potential for soil erosion, and identify measures to limit erosion. Where necessary, erosion and sediment control measures must be developed and implemented in accordance with 25 Pa. Code Chapter 102 and DEP's "Erosion and Sediment Pollution Control Manual" (DEP ID 363-2134-008).

- **f.** The PPC Plan must include a plan for training employees and contractors on pollution prevention, BMPs, and emergency response measures.

- **Part C. Section VI.D of the Permit states** "Areas contributing to a stormwater discharge associated with industrial activity shall be visually inspected for evidence of, or the potential for, pollutants entering the drainage system. BMPs in the PPC Plan and required by this permit shall be inspected on a semiannual basis, at a minimum, to determine whether they are adequate and properly implemented in accordance with the terms of this permit or whether additional control measures are needed. Documentation of inspections shall be maintained on-site and be made available to DEP upon request."

Observation #1:

During the Closing Conference, a facility representative states no annual reports were completed for storm water (Exhibit C – Stormwater Inspection Form) per PPC Plan (Appendix B).

The EPA Inspection Team observed stormwater flow that carried sediment (and other particulate matter) that was discharging into an inlet located between the sludge drying beds (Exhibit A, see Photo P5040055). The inlet drains to Hare Creek.

Effluent Limitations and Monitoring Requirements

Permit Requirement:

Part A I.A of the Permit defines effluent limitations and monitoring requirements for Outfall 001 discharges

Observation #2

According to EPA's Enforcement and Compliance History Online (ECHO), the Facility experienced 31 effluent limit exceedances from Outfall 001 between February 28, 2018-September 30, 2022. These exceedances include bis (2-ethylhexyl) phthalate, fecal coliform, total copper (as Cu), and total suspended solids (TSS)

Facility representative stated fecal coliform is high in relative to septic hauler(s) bringing in waste (organic matter) that absorbs the chlorine. There was not enough available chlorine to disinfect the water due to absorption from the organic matter. The water at the Facility had changed into a brownish color that increased which resulted in higher fecal coliform.

Table 3. Effluent Exceedances form Outfall 001 (February 28, 2018 – September 30, 2022)

Monitoring Period End Date	Parameter	Limit Type	DMR Value	Permit Limits	Units	Limit Start Date	Limit End Date
2/28/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.007	0.004	mg/L	12/1/2014	11/30/2019
2/28/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.090	0.0498	kg/d	12/1/2014	11/30/2019
2/28/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.226	0.077	kg/d	12/1/2014	11/30/2019
2/28/2018	Coliform, fecal general	GEO MEAN	8	2000	CFU/100mL	12/1/2014	11/30/2019
2/28/2018	Coliform, fecal general	INST MAX	2419.6	10000	CFU/100mL	12/1/2014	11/30/2019
3/31/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00457	0.004	mg/L	12/1/2014	11/30/2019
3/31/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.0907	0.077	kg/d	12/1/2014	11/30/2019
7/31/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00401	0.004	mg/L	12/1/2014	11/30/2019
9/30/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.005	0.004	mg/L	12/1/2014	11/30/2019
7/31/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.00401	0.004	mg/L	12/1/2014	11/30/2019
9/30/2018	Bis(2-ethylhexyl) phthalate	MO AVG	0.005	0.004	mg/L	12/1/2014	11/30/2019
12/31/2018	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.0907	0.077	kg/d	12/1/2014	11/30/2019
2/28/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.0907	0.077	kg/d	12/1/2014	11/30/2019
2/28/2019	Coliform, fecal general	INST MAX	4839.2	10000	CFU/100mL	12/1/2014	11/30/2019
2/28/2019	Coliform, fecal general	GEO MEAN	458	2000	CFU/100mL	12/1/2014	11/30/2019
3/31/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.136	0.077	kg/d	12/1/2014	11/30/2019
3/31/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.006	0.004	mg/L	12/1/2014	11/30/2019

Table 3. Effluent Exceedances form Outfall 001 (February 28, 2018 – September 30, 2022)

Monitoring Period End Date	Parameter	Limit Type	DMR Value	Permit Limits	Units	Limit Start Date	Limit End Date
3/31/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.09070	0.0498	kg/d	12/1/2014	11/30/2019
4/30/2019	Copper, total (as Cu)	MO AVG	0.141	0.012	mg/L	12/1/2014	11/30/2019
4/30/2019	Copper, total (as Cu)	MO AVG	2.267	0.158	kg/d	12/1/2014	11/30/2019
4/30/2019	Copper, total (as Cu)	WKLY AVG	9.523	0.235	kg/d	12/1/2014	11/30/2019
4/30/2019	Bis(2-ethylhexyl) phthalate	WKLY AVG	0.272	0.077	kg/d	12/1/2014	11/30/2019
4/30/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.181	0.049	kg/d	12/1/2014	11/30/2019
4/30/2019	Bis(2-ethylhexyl) phthalate	MO AVG	0.025	0.004	mg/L	12/1/2014	11/30/2019
2/29/2020	Coliform, fecal general	INST MAX	2419.6	10000	#/100mL	12/1/2014	11/30/2019
2/29/2020	Coliform, fecal general	GEO MEAN	10	2000	#/100mL	12/1/2014	11/30/2019
10/31/2020	Coliform, fecal general	GEO MEAN	16	2000	#/100mL	12/1/2014	11/30/2019
10/31/2020	Coliform, fecal general	INST MAX	2419.6	10000	#/100mL	12/1/2014	11/30/2019
5/31/2022	Solids, total suspended	WKLY AVG	46	45	mg/L	12/1/2014	11/30/2019
5/31/2022	Solids, total suspended	WKLY AVG	812.698	595.918	kg/d	12/1/2014	11/30/2019
7/31/2022	Coliform, fecal general	INST MAX	2419.6	2000	#/100mL	12/1/2014	11/30/2019
9/30/2022	Solids, total suspended	WKLY AVG	837.188	595.918	kg/d	12/1/2014	11/30/2019
9/30/2022	Coliform, fecal general	INST MAX	2419.6	2000	#/100mL	12/1/2014	11/30/2019

Facility representatives cannot determine why total copper (as CU) values are high.

Permit Requirement

Proper Operation and Maintenance

Part B Section E.2 of the Permit states "The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit…."

Observation #3

During the inspection, the EPA Inspection Team observed debris and trash around bar screen/rack (Exhibit A, see Photo P5040080) located at Avenue A Pump Station and CSO Outfall 005 located at Wright Street A (Exhibit A, see Photo P5040078).

V. Closing Conference

At the conclusion of the onsite inspection, the EPA Inspection Team conducted a closing conference with the Facility representatives and shared preliminary observations. The EPA Inspection Team reiterated to the Facility representatives that all preliminary observations discussed were not compliance determinations. All preliminary observations shared were subject to further investigation by EPA upon the 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 approximately at 1:50 PM (EDT).