



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

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 03/24/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: NPDES CWA Pretreatment
Site/Facility Name: DELCORA Sewage Treatment Plant (STP)
Permittee(s): DELAWARE COUNTY REGIONAL WATER QUALITY CONTROL AUTHORITY (DELCORA)
Site/Facility Operator: DELCORA
Site/Facility Address: 3201 W Front Street
Chester, PA 19013-2320
Latitude: 39.82553 **Longitude:** -75.39399
County/Parish: Delaware County
Permit Number: PA0027103
NAICS Code: 221320 **SIC:** 4952
Unique Project #: 3E22WN005A

Site/Facility Representative(s): Irene Fitzgerald – Lab and Pretreatment Manager, DELCORA **Point of Contact** ☒
Phone: 610-876-5523 x 213 Email: fitzgeraldi@delcora.org

EPA Inspectors:
Aaron Thomson – EPA Inspector (3ED13)
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EPA Contractors:
N/A

State/Local Inspectors:
N/A

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

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

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I. Introduction

On March 24, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a NDPES CWA Pretreatment of the DELCORA STP 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. PA0027103 (hereinafter, the “Permit”) and applicable State and Federal regulations. This inspection was conducted as part of a routine periodic inspection.

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
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA	215-814-2116	Thomson.aaron@epa.gov
Ryan Shuart	EPA	215-814-2714	Shuart.ryan@epa.gov
Site/Facility Representatives			
Irene Fitzgerald	DELCORA Lab/Pretreatment Manager	610-876-5523 x 213	fitzgeraldi@delcora.org
Mike Krause	DELCORA Pretreatment Supervisor	(610) 876- 5523	Krausem@delcora.org

Inspector Aaron Thomson displayed their credentials to Ms. Irene Fitzgerald and Mr. Michael Krause 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 as **Attachment #1**. The EPA Inspection Team informed Ms. Fitzgerald 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 cloudy, foggy and 46 degrees fahrenheit.

II. Facility Activity/Walkthrough

The facility has an approved pretreatment program, which is subject to the Federal Pretreatment Regulations 40 CFR Part 403.

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Based on information supplied by Ms. Fitzgerald, DELCORA is currently rated for 44 million gallons per day (MGD). DELCORA is managed by a workforce of approximately 140 people during the day shift and 5 employees are present during the night. The pretreatment program is managed by Ms. Irene Fitzgerald and Mr. Michael Krause, the pretreatment manager and supervisor, respectively. They manage new IU applications and the accompanying preliminary site visits to ensure potential IUs are properly categorized. Additionally, they communicate with the township and use technology/social media to ensure new sources of wastewater discharge are identified. They also handle enforcement of their permits, either fining IU's for exceeding their limit, or discontinuing the site's permission to discharge to DELCORA.

Inspector Thomson asked if any upgrades were being planned for the facility. Ms. Fitzgerald stated that, while the facility is currently rated for 44 MGD, the facility has received Delaware River Basin Commission (DRBC) approval (**Attachment #2**) to rerate the Western Regional Treatment Plant to 50 MGD, pending completion of an outfall extension into the Delaware River.

During a site tour of the facility, led by Mr. Krause, Inspector Thomson observed composite samplers located at the influent/effluent sampling points, each containing a thermometer reading 4 degrees celsius.

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 Thomson but were not included in this report.

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

Section 1.			
Background. (to be filled out before inspection)			
Where stream/river/tributary does the POTW discharge to?	Delaware River, Chester, and Ridley Creeks		
As required by the approved program, list the frequency for:	CIUs	SNIUs	Comments
POTW Sampling of IUs	1	1	Average 2/year
POTW Inspection of IUs	1	1	
IU self-monitoring	Monthly/ Quarterly	Monthly/ Quarterly	If 0 discharge, then semi- annually
IU reporting	Monthly/ Quarterly	Monthly/ Quarterly	
In the last calendar year, indicate frequency of:			
POTW sampling of IUs	1+	1+	
POTW Inspection of IUs	1+	1+	

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If less than required by the approved program or less than 1/yr [403.8(f)(2)(v)], explain:	Pyromet Recycling – ceased operation in May 2021 and dismantled their production system – will continue to monitor Norquay, LLC – not sampled during the reporting period as they do not discharge industrial wastewater to DELCORA. Norquay submits semi-annual statements certifying all industrial wastewater is disposed of off-site, DELCORA reviews manifest during annual inspections Pennsylvania Machine Works, Inc. (PMW) – not sampled during the reporting period as they do not discharge industrial wastewater to DELCORA. PMW submits semi-annual statements certifying all industrial wastewater is disposed of off-site, DELCORA reviews manifest during annual inspections			
List all the SIUs that were found to have not been sampled or not inspected at the last PCI or annual report. Indicate if they are NS (not sampled), NI (not inspected), or B (both not inspected and not sampled)	Pyromet (B), Norquay (B), PMW (B)			
	Yes	No	N/A	Comments
Does the annual report indicate any new CIUs?	☒	☐	☐	Quotients – June 2020 - Pharmaceutical
List all visual observations pertaining to this section	DELCORA stated that it had experienced a CBOD passthrough event caused by high strength wastewater received from an IU in 2020. DELCORA stated that it did not notify EPA of the event. EPA asked DELCORA to review the pretreatment notification requirements in 40 CFR 403 and in its NPDES permit.			

Section 2.				
POTW sampling and inspection				
List the SIUs that were either not sampled or not inspected in the last 12 months [403.8(f)(2)(v)] Indicate if they are NS (not sampled), NI (not inspected), or B (both not inspected and not sampled).	Pyromet (B), Norquay (B), PMW (B)			
	Yes	No	N/A	Comments
Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample? List the number of grab samples	☒	☐	☐	1/per parameter

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Are composite samples used for all other pollutants to evaluate compliance with:				
Categorical Standards?	☒	☐	☐	
Local Limits?	☒	☐	☐	
Is any unannounced sampling conducted?	☒	☐	☐	1/year when possible
Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	☒	☐	☐	
How much time normally elapses between sample collection and obtaining analytical results?	ALS Environmental provides official results in approximately 20 days, but supplies unofficial results to the facility within a few days			
Does the POTW use QA/QC procedures such as:				
Use of calibration and maintenance plan for sampling equipment?	☒	☐	☐	
Training for sampler?	☒	☐	☐	O.J.T.
Split Samples (field)?	☒	☐	☐	Not "normal" sop but do infrequently
Training for analyst?	☐	☐	☒	
Duplicate Samples (laboratory)?	☐	☐	☒	
Method Blanks (laboratory)?	☐	☐	☒	
Spiked Samples (laboratory)?	☐	☐	☒	
List all visual observations pertaining to this section				

Section 3.				
IU Self-Monitoring and Reporting				
As currently conducted, list frequency for:	CIUs		SNIUs	Comments
IU Self-Monitoring	As required		As required	Will assess compliance for past 4 years to determine frequency necessary
IU reporting	Monthly		Monthly	
If less than required by the approved program, explain				
	Yes	No	N/A	Comments
If IUs sample more frequently than required, do they report all sampling results to the POTW [403.12(g)(5)]?	☒	☐	☐	The facility is aware of sampling and testing that is done by their IU's, that is relevant, but not required by their control mechanism; the IU's

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				supply the test results as requested by the Facility
List all new sources IUs:	N/A			
Have the following been received by all IUs which became new sources in the last 12 months (403.12))?				
Baseline Monitoring Reports	☐	☐	☒	
Compliance Schedule Milestone Reports	☐	☐	☒	
90-day Final Compliance Reports	☐	☐	☒	
How does POTW verify the information in these reports	Self-monitoring, influent sampling, asking labs directly for verification; use technology/social media to target new industries			
Do any IUs discharge hazardous waste?	☐	☒	☐	
If no, how does the POTW verify this?	Inspections/Evaluation on Site/Each hauled tank is tested			
If yes, has the IU submitted the proper notifications?	n/a			
List all visual observations pertaining to this section	The Facility accepts hauled waste from 270 different sites, each site is visited and tested before being allowed to obtain a permit/insurance to discharge at the facility, each load brought to facility is sampled and tested for COD and TSS. DELCORA stated that all SIUs in SNC over the previous reporting period, 2021, are hauled waste contributors that do not discharge via the collection system. For pollutants where grab samples are taken in accordance with 40 CFR 136, DELCORA will only take one grab sample instead of a series of grabs over the sample period as part of it SOP for the POTWs sampling of the SIUs.			

Section 4.	
IU File Evaluation	
List IUs below:	
IU Name	Qualawash Holding LLC
Category (SNIU/CIU)	(40 CFR 442.10) -TRANSPORTATION EQUIPMENT CLEANING POINT SOURCE CATEGORY
Regulated parameters (include categorical standards & local limits)	Flow, FOG, pH, Antimony, Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Zinc,

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	Cyanide, Phenols, Benzene, Toluene, Ethylbenzene, Xylene, PCBs – include BOD ₅ , TSS, and COD but no established limits
Address	8 Route 130 Pedricktown, NJ 08067
Description of IU manufacturing/pretreatment processes	4 Tanker truck cleaning bays. Primary materials being washed out are latex, resin, polymer and oil. WWTF has Equalization Tank, Clarifier, sludge settling/dewatering.
IU Name	Liberty Electric Power, LLC
Category (SNIU/CIU)	(40 CFR 423) CIU – Steam Electric Power Generating
Regulated parameters (include categorical standards & local limits)	Flow, pH, FOG, Antimony, Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Zinc, Cyanide, Phenols, PCBs, Benzene, Ethylbenzene, Toluene, Xylenes, Temperature, 126 priority pollutants found in cooling tower water mentioned in Appendix A of 40 CFR 423 - include BOD ₅ , TSS, TDS, COD but no established limit
Address	1000 Industrial Highway, Eddystone, PA 19022
Description of IU manufacturing/pretreatment processes	Electric generation (blowdown/cleaning water) – oil/water separator for oily sump discharge, blowdown not pretreated
IU Name	Eldredge, Inc.
Category (SNIU/CIU)	CIU – Residual Waste Treatment including Metals, Oils & Organic Treatments (40 CFR 437.20)
Regulated parameters (include categorical standards & local limits)	Flow, pH, Oil and Grease, Cyanide, Antimony, Arsenic, Cadmium, Chromium, Cobalt, Copper, Lead, Mercury, nickel, Selenium, Silver, Tin, vanadium, Zinc, Bis(2-ethylhexyl) phthalate, Carbazole, o-Cresol, p-Cresol, n-Decane, flouranthene, n-Octadecane, 2,4,6-Trichlorophenol, Phenols PCBs, Benzene, Ethylbenzene, Toulene, Xylenes - include BOD ₅ , TSS, TDS, COD but no established limit
Address	898 Fern Hill Road, West Chester, PA 19380
Description of IU manufacturing/pretreatment processes	Residual Waste Treatment

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IU Name	ICS SDS - LLC
Category (SNIU/CIU)	SNIU
Regulated parameters (include categorical standards & local limits)	Flow, FOG, pH, Antimony, Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Nickel, Selenium, Silver, Zinc, Cyanide, PCBs, Benzene, Ethylbenzene, Toluene, Xylenes - include BOD ₅ , TSS, COD but no established limit
Address	267 Jefferson Street, Camden, NJ 08104
Description of IU manufacturing/pretreatment processes	Post-Consumer food and beverage storage container recycling

Section 5. A				
File Review Checklist				
IU Name:	Qualawash Holding LLC			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	No	N/A	Comments
Is the IU properly categorized?	☒	☐	☐	The IU was covered by 40 CFR 442.16 and has submitted a pollutant management plan.
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	Yes, electronic copies of required information were received including Permits, Enforcement documentation, SMRs, Inspection reports, Spill plans, and POTW monitoring events.			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	Application is included in the Slug control plan document
a current control mechanism	☒	☐	☐	Effective 11/2/18 to 10/31/22
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	No Fact sheet was provided however the permit includes a description and the limitation determination rationale and regulatory notes
Were local limits and/or categorical standards properly applied?	☐	☒	☐	The permit does not include a requirement to include a certification

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				statement of its intent to utilize a Pollutant Management Plan, see 40 CFR 442.16(b)(2)
If applicable, were production-based standards correctly applied?	☐	☐	☒	PMP in lieu of numeric limits. 40 CFR 442 has concentration-based limitations.
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	CWT not used
If applicable, were TTO requirements or alternatives correctly applied?	☐	☐	☒	No TOMP, only PMP
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	Part III of Permit
sample type?	☒	☐	☐	Part III of Permit
Is the permit effective for 5 years or less?	☒	☐	☐	Effective 11/2/18 to 10/31/22
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	Yes, date of inspection is 10/6/2021			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	Irene Fitzgerald
Inspection date/time	☒	☐	☐	10/6/21 1:30PM
Name of IU official contacted.	☒	☐	☐	Cover Page
Review of manufacturing facilities	☒	☐	☐	Cover Page
Verification of production data if needed	☐	☐	☒	Section V
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	Section V
Condition of pretreatment facilities	☐	☒	☐	Section X contains specific housekeeping questions but none about the pretreatment facilities; information about the pretreatment facilities included in the narrative response
Evaluation of chemical storage areas	☒	☐	☐	Section VI
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	Section II
Evaluation of spill/slug control procedures	☒	☐	☐	Section II
Evaluation of housekeeping practices	☒	☐	☐	Throughout Inspection template

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Evaluation of potential for hazardous waste discharge	☒	☐	☐	Section V
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	Section VIII
Evaluation of lab procedures	☒	☐	☐	Section VII
Evaluation of monitoring records	☒	☐	☐	Section I
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	2 Sampling Events occurred			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	COC
sample date/time	☒	☐	☐	COC
sample type	☒	☐	☐	COC, Grab
sample location	☒	☐	☐	COC
wastewater flow during sampling	☐	☒	☐	All sample were grab samples and do no list flow data
sample preservation	☒	☐	☐	COC
chain of custody	☒	☐	☐	
analytical methods used	☒	☐	☐	Lab Report
analysis date	☒	☐	☐	Lab Report
name of analyst	☒	☐	☐	Lab Report
all analytical data	☒	☐	☐	
Were all the regulated parameters monitored?	☒	☐	☐	Lab Report
Were 40 CFR 136 analytical methods used?	☒	☐	☐	Lab Report
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☒	☐	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	
When was the plan last updated?	9/21/2020 SPCC plan received was an older version from 2017			
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	Section II
Description of stored chemicals	☒	☐	☐	Section II
Procedure to prevent slugs/spills	☒	☐	☐	Section III Part 9
Procedure to notify POTW of slugs/spills	☒	☐	☐	Section III Part 12

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Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	Section III Part 12
List all visual observations pertaining to this section	All information was provided. Qualawash's permit does not include a requirement to include a certification statement of its intent to utilize a Pollutant Management Plan, see 40 CFR 442.16(b)(2) . Condition of the pretreatment facilities was not included as a question on the Inspection template.			

Section 5. B				
File Review Checklist				
IU Name:	Liberty Electric Power, LLC			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	No	N/A	Comments
Is the IU properly categorized?	☒	☐	☐	
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	Yes, electronic copies of required information were received including Permits, Enforcement documentation, SMRs, Inspection reports, Spill plans, and POTW monitoring events.			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	Application dated 10/29/21 reviewed
a current control mechanism	☒	☐	☐	Effective 5/1/21 to 4/30/25
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	No Fact sheet was provided however the permit includes a description and the limitation determination rationale and regulatory notes
Were local limits and/or categorical standards properly applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	Concentration based limits
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	CWT not used
If applicable, were TTO requirements or alternatives correctly applied?	☐	☐	☒	PMP
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	Part III of Permit

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sample type?	☒	☐	☐	Part III of Permit
Is the permit effective for 5 years or less?	☒	☐	☐	Effective 5/1/21 to 4/30/25
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	Yes date of inspection is 9/15/2021			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	Irene Fitzgerald & Meg O'Donnel
Inspection date/time	☒	☐	☐	9/15/21 10:15 AM
Name of IU official contacted.	☒	☐	☐	Cover Page
Review of manufacturing facilities	☒	☐	☐	Cover Page
Verification of production data if needed	☐	☐	☒	Section IV
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	Section IV
Condition of pretreatment facilities	☐	☒	☐	Section X contains specific housekeeping questions but none about the pretreatment facilities; information about the pretreatment facilities included in the narrative response
Evaluation of chemical storage areas	☒	☐	☐	Section VI
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	Section II
Evaluation of spill/slug control procedures	☒	☐	☐	Section II
Evaluation of housekeeping practices	☒	☐	☐	Throughout Inspection template
Evaluation of potential for hazardous waste discharge	☒	☐	☐	Section V
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	Section VIII
Evaluation of lab procedures	☒	☐	☐	Section VII
Evaluation of monitoring records	☒	☐	☐	Section I
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	2 – most recent supplied 9/19/21			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	COC
sample date/time	☒	☐	☐	COC
sample type	☒	☐	☐	COC, Grab & Composite
sample location	☒	☐	☐	COC

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wastewater flow during sampling	☐	☒	☐	
sample preservation	☒	☐	☐	COC
chain of custody	☒	☐	☐	
analytical methods used	☒	☐	☐	Lab Report
analysis date	☒	☐	☐	Lab Report
name of analyst	☒	☐	☐	Lab Report
all analytical data	☒	☐	☐	
Were all the regulated parameters monitored?	☒	☐	☐	Lab Report
Were 40 CFR 136 analytical methods used?	☒	☐	☐	Lab Report
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☒	☐	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	
When was the plan last updated?	11/30/2021 SPCC plan signed and dated, the document supplied contains revisions and comments intended for a newer version			
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	Discharge Process
Description of stored chemicals	☒	☐	☐	Storage Tanks and Material Inventory
Procedure to prevent slugs/spills	☒	☐	☐	Pre-Release Planning
Procedure to notify POTW of slugs/spills	☒	☐	☐	Spill Response
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	Response Procedures
List all visual observations pertaining to this section	All information was provided. Condition of the pretreatment facilities was not included as a question on the Inspection template.			

Section 5. C	
File Review Checklist	
IU Name:	Eldredge, Inc
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU

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	Yes	No	N/A	Comments
Is the IU properly categorized?	☒	☐	☐	40 CFR 437.20
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	Yes, electronic copies of required information was received including Permits, Enforcement documentation, SMRs, Inspection reports, Spill plans, and POTW monitoring events.			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	12/30/19
a current control mechanism	☒	☐	☐	Effective 6/1/20 to 5/31/24
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	No Fact sheet was provided however the permit includes a description and the limitation determination rationale and regulatory notes
Were local limits and/or categorical standards properly applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	concentration-based limitations.
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	CWT not used
If applicable, were TTO requirements or alternatives correctly applied?	☐	☐	☒	PMP
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	Part III of Permit
sample type?	☒	☐	☐	Part II of Permit
Is the permit effective for 5 years or less?	☒	☐	☐	Effective 6/1/20 to 5/31/24
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	Yes date of inspection is 6/14/2021			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	Irene Fitzgerald & Meg O'Donnell
Inspection date/time	☒	☐	☐	6/14/21 11:40 AM
Name of IU official contacted.	☒	☐	☐	Cover Page
Review of manufacturing facilities	☒	☐	☐	Cover Page
Verification of production data if needed	☐	☐	☒	Section V
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	Section V

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Condition of pretreatment facilities	☐	☒	☐	Section X contains specific housekeeping questions but none about the pretreatment facilities; information about the pretreatment facilities included in the narrative response
Evaluation of chemical storage areas	☒	☐	☐	Section VI
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	Section II
Evaluation of spill/slug control procedures	☒	☐	☐	Section II
Evaluation of housekeeping practices	☒	☐	☐	Throughout Inspection template
Evaluation of potential for hazardous waste discharge	☒	☐	☐	Section V
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	Section VIII
Evaluation of lab procedures	☒	☐	☐	Section VII
Evaluation of monitoring records	☒	☐	☐	Section I
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	1 Sampling Events occurred			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	COC
sample date/time	☒	☐	☐	COC
sample type	☒	☐	☐	COC, Grab
sample location	☒	☐	☐	COC
wastewater flow during sampling	☐	☒	☐	All sample were grab samples and do no list flow data
sample preservation	☒	☐	☐	COC
chain of custody	☒	☐	☐	
analytical methods used	☒	☐	☐	Lab Report
analysis date	☒	☐	☐	Lab Report
name of analyst	☒	☐	☐	Lab Report
all analytical data	☒	☐	☐	
Were all the regulated parameters monitored?	☒	☐	☐	Lab Report
Were 40 CFR 136 analytical methods used?	☒	☐	☐	Lab Report
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	

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Slug/Spill Control				
Have any slugs/spills been documented in the file?	☒	☐	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	
When was the plan last updated?	10/31/2015 SPCC plan signed and dated			
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	C 1.1 Potential Sources...
Description of stored chemicals	☒	☐	☐	Sections A & C
Procedure to prevent slugs/spills	☒	☐	☐	Section C
Procedure to notify POTW of slugs/spills	☒	☐	☐	Section C
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	Sections C & D
List all visual observations pertaining to this section	All information was provided. Condition of the pretreatment facilities was not included as a question on the Inspection template.			

Section 5. D				
File Review Checklist				
IU Name:	ICS SDS - LLC			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	SNIU			
	Yes	No	N/A	Comments
Is the IU properly categorized?	☒	☐	☐	
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	Yes, electronic copies of required information was received including Permits, Enforcement documentation, SMRs, Inspection reports, Spill plans, and POTW monitoring events.			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	3/5/19
a current control mechanism	☒	☐	☐	Effective 5/1/19 to 4/30/23
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	No Fact sheet was provided however the permit includes a description and the limitation

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				determination rationale and regulatory notes
Were local limits and/or categorical standards properly applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	concentration-based limitations.
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	CWT not used
If applicable, were TTO requirements or alternatives correctly applied?	☐	☐	☒	PMP
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	Part III of Permit
sample type?	☒	☐	☐	Part III of Permit
Is the permit effective for 5 years or less?	☒	☐	☐	Effective 5/1/19 to 4/30/23
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	Yes, date of inspection is 12/13/2021			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	Michael Krause
Inspection date/time	☒	☐	☐	12/13/21 10:00 AM
Name of IU official contacted.	☒	☐	☐	Cover Page
Review of manufacturing facilities	☒	☐	☐	Cover Page
Verification of production data if needed	☐	☐	☒	Section V
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	Section V
Condition of pretreatment facilities	☐	☒	☐	Section X contains specific housekeeping questions but none about the pretreatment facilities; information about the pretreatment facilities included in the narrative response
Evaluation of chemical storage areas	☒	☐	☐	Section VI
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	Section II
Evaluation of spill/slug control procedures	☒	☐	☐	Section II
Evaluation of housekeeping practices	☒	☐	☐	Throughout Inspection template
Evaluation of potential for hazardous waste discharge	☒	☐	☐	Section V
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	Section VIII

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Evaluation of lab procedures	☒	☐	☐	Section VII
Evaluation of monitoring records	☒	☐	☐	Section I
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	2 Sampling Events occurred			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	COC
sample date/time	☒	☐	☐	COC
sample type	☒	☐	☐	COC, Grab
sample location	☒	☐	☐	COC
wastewater flow during sampling	☐	☒	☐	All sample were grab samples and do no list flow data
sample preservation	☒	☐	☐	COC
chain of custody	☒	☐	☐	
analytical methods used	☒	☐	☐	Lab Report
analysis date	☒	☐	☐	Lab Report
name of analyst	☒	☐	☐	Lab Report
all analytical data	☒	☐	☐	
Were all the regulated parameters monitored?	☒	☐	☐	Lab Report
Were 40 CFR 136 analytical methods used?	☒	☐	☐	Lab Report
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☒	☐	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	
When was the plan last updated?	No Date Indicated/Signature On ICS-SDS Spill Response Plan Provided			
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	Section 1. A
Description of stored chemicals	☒	☐	☐	Section 1. B
Procedure to prevent slugs/spills	☒	☐	☐	Section 1. D, E & F
Procedure to notify POTW of slugs/spills	☒	☐	☐	Section 1. C
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	Section 1. G

List all visual observations pertaining to this section

All information was provided. Condition of the pretreatment facilities was not included as a question on the Inspection template.

IV. Records Review

As part of the inspection, prior to the inspection, the EPA Inspection Team requested the documentation listed in **Attachment #14**. Per discussion between Ms. Fitzgerald and Inspector Thomson prior to the inspection, of the IU's selected for file review, Covanta was replaced with Liberty Electric and the time periods of documents requested "over 3 years" were reduced to 2 years. It may also be noted that Quotient Sciences was not included in the file review section, although supplied documents were reviewed and attached. Records relevant to the inspection report are attached and listed below.

During the file review, Inspector Thomson observed the following IU's were in significant noncompliance (SNC); Eldredge, Inc.; Delaware County Solid Waste Authority (DCSWA); Refresco Beverages US, Inc.; and Quotient Sciences. Ms. Fitzgerald stated Eldredge, Inc., a waste disposal/recycling facility, changed their process is unable to meet regulated parameters and stopped discharging to the facility at the end of March 21, 2022. Eldredge had TRC violations of the octadecane monthly concentration limit in October 2020-March 2021 as well as TRC/Chronic violations of the zinc monthly concentration limit during October 2020-March 2021 and January 2021-June 2021. DCSWA was in SNC during September 2021 for failure to monitor, and a fine was issued. Refresco Beverages US, Inc. had TRC violations of the FOG concentration limit during January 2021-June 2021, April 2021-September 2021 and July 2021-December 2021 as well as chronic violations of the FOG concentration limit during April 2021-September 2021 and July 2021-December 2021, all of which were met with a fine by the facility. Quotient Sciences had a TRC violation of the acetone monthly concentration limit during October 2020 – March 2021 for which a penalty was issued. Additionally, although not in SNC, Qualawash has been asked to cease discharge to the facility due to high oil and grease in their discharge, until Qualawash can identify and fix their elevated oil and grease levels.

V. Closing Conference

After the facility inspection, 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

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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 - PADEP-final permit 4-1-2021 – Consolidated

Attachment #2 - DELCORA Re-rate 1992-018CP-3

Attachment #3 - NPDES Violations Reported

Attachment #4.A-#4.Y – DMRs

Attachment #5.A-#5.K – Inspections

Attachment #6.A-#6.E - IU Permits

Attachment #7.A-#7.S – NOVs

Attachment #8.A-#8.J – SMRs

Attachment #9.A-#9.L - SNC & Fines

Attachment #10.A-#10.E - Spill Plans

Attachment #11.A-#11.S – VMR

Attachment #12 IUs List