



**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): Feb. 2, 2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial User Inspection
Site/Facility Name: Parker Hannifin Corporation (fka: Lord Corporation)
Site/Facility Address: 124 Grant Street
Cambridge Springs, PA. 16403
Latitude: 41.80507 **Longitude:** -80.06158
County: Crawford
Permit Number: PAP123931
NAICS Code: 333999 **SIC:** 3069
Unique Project #: 3E22WN029A

Site/Facility Representative: **Point of Contact**
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James Kline

April 1, 2022

**Report Preparer
Signature/Date**

Report preparer name/(& mail code if EPA Inspector)
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Date

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Signature/Date**

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Date

Unique Project#: 3E22WN029A

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I. Introduction

On February 2, 2022, the United States Environmental Protection Agency, Region III (“EPA”), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an onsite Industrial User Pre-Treatment Inspection at the Parker Hannifin Corporation (hereinafter, “the Facility”). The Facility is formerly known as Lord Corporation and is located at 124 Grant Street in Cambridge Springs, Pennsylvania (See Attachment #1- Photo #1). The purpose of the inspection was to observe compliance with the Pre-Treatment Regulations of the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The EPA is the control authority for the Facility. The U.S. EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). The PADEP did not have a representative present for the inspection.

A. Opening Conference

Inspector Kline arrived at the Facility on Tuesday, February 2, 2022, at 10:45AM, and presented his credentials to Mr. Douglas Squeglia, EHS Manager. Inspector Kline conducted an opening conference in Mr. Squeglia’s Office. Attending were Mr. Squeglia and Inspector Kline. Inspector Kline explained the purpose and scope of the inspection to Mr. Squeglia.

Inspector Kline requested that any information that the Facility deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

B. Weather Conditions

During the inspection, the ground was snow-covered, and weather was rainy with temperatures in the lower thirty (30) degrees Fahrenheit.

II. Summary of the Facility

According to Mr. Squeglia, the Facility changed its name in 2019 to Parker Hannifin Corporation, the former name being the Lord Corporation. The Facility operates four to five days a week, sixteen hours a day covered by two shifts and has 102 full-time employees.

The Facility develops adhesives, coatings, sensing technologies and motion management devices for the Oil and Gas, Aerospace, Aviation, Defense, Automotive and Industrial Industries. The Facility has been at this location since the 1970's, with the corporate headquarters located in Cary, NC. Mr. Squeglia stated the rubber to metal bonding operations was transferred back to the Facility from its sister plant in Bowling Green, KY. in June 2021.

Inspector Kline asked Mr. Squeglia to describe the Facility Pretreatment Program. Mr. Squeglia provided Inspector Kline with a simplified process diagram (**See Attachment #2**). Mr. Squeglia stated the pretreatment process is a continuous flow and discharged approximately six-thousand gallons per day from January 2021 until June 2021. According to Mr. Squeglia at the end of 2021, flows increased to seventeen-thousand gallons per day. Mr. Squeglia stated the Facility discharges to the Cambridge Springs Sewer Authority and is well below their sixty-one-thousand gallon per day permit limit.

Inspector Kline asked Mr. Squeglia to describe the wastewater monitoring and sample collection. Mr. Squeglia stated that samples for analysis are collected monthly. Mr. Squeglia further added that a contract third-party lab collects composite and grab samples. Mr. Squeglia clarified that the Facility does collect grab samples to check for pH, zinc and chrome in the Facility Lab. According to Mr. Squeglia, the contracted third-party lab provides all collection bottles and a composite sampler. Mr. Squeglia stated all samples are collected from the Sampling Tank.

III. Observations

Mr. Squeglia escorted Inspector Kline on a tour of the Facility. Inspector Kline requested to first tour the Pretreatment System. Inspector Kline observed the holding tanks and associated piping while Mr. Squeglia went over and traced the flow of the Pretreatment System. Mr. Squeglia escorted Inspector Kline to the lower-level of the Pretreatment Area called, "The Pit" (**See Attachment #1- Photo #2**). Inspector Kline observed the Sampling Tank (**See Attachment #1- Photo #3**). According to Mr. Squeglia, all samples are collected from within this tank.

Inspector requested to be escorted to the Facility Lab. Mr. Squeglia stated the Lab is located in the area called, "Ionics." Inspector Kline observed the calibration supplies, equipment and associated operator's manuals used for pH, zinc and chrome analysis.

IV. Records Review

Inspector Kline requested to review analytical reports and documents from the Facility sampling events. Inspector Kline did not immediately observe any exceedances. Inspector Kline asked Mr. Squeglia if the Facility had any exceedances since 2018. Mr. Squeglia stated the last exceedance was for zinc and that occurred on February 28, 2019 and was reported to the EPA. Mr. Squeglia

provided documentation associated with the exceedance event (**See Attachment #3**). Mr. Squeglia stated the permit limits have been established by the Borough of Cambridge Springs back in 1981 and have not since changed (**See Attachment #4**).

Inspector Kline completed the Industrial User Checklist with input from Mr. Squeglia (**See Attachment #5**).

V. Closing Conference

Inspector Kline conducted a closing conference with Mr. Squeglia. Inspector Kline shared preliminary observations about the Facility. Inspector Kline reiterated to Mr. Squeglia that all the preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference.

VI. List of Attachments

Attachment 1: Photos

Attachment 2: Pretreatment Flow Diagram

Attachment 3: Zinc Exceedance 2/28/2019

Attachment 4: Cambridge Springs Permit

Attachment 5: IU Checklist