UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	09/26/2024
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Industrial User Inspection
Site/Facility Name:	Eureka Resources, LLC
Site/Facility Address:	419 Second Street Williamsport, PA 17701
Latitude:	41.23761 **Longitude:** -77.00864
County:	Lycoming County
Permit Number:	Not permitted
NAICS Code:	562119 **SIC:** 5093
Unique Project #:	ECAD-6180

Site/Facility Representative: **Point of Contact**
Chad Snyder, Plant Manager ☒
Phone: (570) 323-2535 Email: c.snyder@eureka-resources.com

EPA Inspector:
Jim Kline
Phone: (304) 234-0263 Email: kline.james@epa.gov

James Kline Digitally signed by James Kline Date: 2025.01.28 09:04:56 -05'00'

Report Preparer Signature/Date Jim Kline (3ED32) Date
NPDES Section 1

MARK ZOLANDZ Digitally signed by MARK ZOLANDZ Date: 2025.01.28 10:50:28 -05'00'

Supervisor Signature/Date Mark Zolandz, Section Chief (3ED32) Date
NPDES Section 1

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I. Introduction

On September 12, 2024, the United States Environmental Protection Agency ("EPA") Region 3 conducted an onsite Industrial User Pretreatment Inspection at the Eureka Resources, LLC ("Eureka") facility located at 419 Second Street in Williamsport, Pennsylvania (hereinafter, the "Facility"). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the Pretreatment Regulations, National Pollutant Discharge Elimination System (NPDES) program requirements, and applicable State and Federal regulations. The EPA lead inspector was Inspector Jim Kline (Inspector Kline). Accompanying Inspector Kline on the IU Inspection was Ms. Jessica Duffy, EPA Region 3. Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). PADEP did not have a representative present for the inspection.

Eureka was previously visited as part of a Pretreatment Compliance Inspection (PCI) of the Williamsport Sanitary Authority (WSA) that was conducted by the EPA on March 18-20, 2024. This is a follow-up to that inspection. During the March 2024 PCI, the Facility was reportedly shut down for maintenance and was not discharging to the WSA at that time.

A. Opening Conference

Inspector Kline and Ms. Duffy arrived at the Facility on Thursday, September 26th, 2024, at approximately 9:00 AM. Immediately upon arrival, Inspector Kline and Ms. Duffy observed a commercial real estate "For Sale" sign posted at the Facility **(See Attachment #1- Photo #1)**. Inspector Kline and Ms. Duffy did not observe any vehicles parked in the office parking lot and upon visiting the office, observed the office entrance door was locked. While outside the office building, a vehicle stopped by and the occupant identified himself as Harry Fullmer, Eureka Resources- Head of Maintenance. Mr. Fullmer proceeded to the office and unlocked the door. Inspector Kline presented his credentials to Mr. Fullmer. Inspector Kline and Ms. Duffy conducted an opening conference in Mr. Fullmer's office. Attending were Inspector Kline, Ms. Duffy, and Mr. Fullmer. Inspector Kline explained the purpose and scope of the inspection to Mr. Fullmer. Mr. Fullmer stated Mr. Chad Snyder is the Plant Manager and was scheduled off and would not be available to attend the inspection. Mr. Fullmer requested that Mr. Snyder be the contact person regarding receipt of the inspection report upon completion.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspection Team			
Jim Kline	EPA Region 3	304-234-0263	kline.james@epa.gov
Jessica Duffy	EPA Region 3	215-814-3212	duffy.jessica@epa.gov
Facility Representatives			
Harry Fullmer	Eureka Resources LLC		

Mr. Fullmer stated the operations, remaining equipment, and buildings at this location were currently listed for sale. Mr. Fullmer stated the office building was sold to an adjacent metal recycling business, and the operations and remaining buildings had an interested purchaser. Mr. Fullmer stated the transport tank trucks were all sold, except for two trucks that needed extensive repair and were not operational. Mr. Fullmer stated the Facility was down to three full-time employees (including himself) at this location.

Inspector Kline requested that any information that Eureka 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 and Precipitation Conditions

During the inspection, the weather was cloudy with temperatures in the lower 60°s Fahrenheit.

II. Facility Activity

Inspector Kline asked Mr. Fullmer if had the Facility repaired the Nomad Supercharger System since the March 18-20, 2024, PCI. Mr. Fullmer stated that the Nomad was still down and was nonoperational. Mr. Fullmer stated operations were at a standstill. Inspector Kline asked Mr. Fullmer if Eureka has generated waste from their filter press since the March 18-20, 2024, PCI. Mr. Fullmer stated Eureka did send a roll-off about two months ago to White Pine Landfill for disposal. On September 30, 2024, Inspector Kline received an e-mail from Mr. Snyder which contained a copy of a manifest for wastewater treatment sludge which was transported from the Facility to White Pines Landfill in Millville, Pennsylvania on August 23, 2024 **(See Attachment #2)**. Mr. Fullmer stated Eureka has not had oil and gas wastewater, or brine come into the Facility for the last three months. Mr. Fullmer stated that oil separation operations are currently occurring from current inventory, with three loads totaling 19,500-gallons which are hauled out weekly. Mr. Fullmer stated the oil is sold and used in asphalt production. Inspector Kline asked if any other portions of the operations are inoperable. Mr. Fullmer stated the effluent discharge flow meter was not operating and that Mr. Jeff Hakes from the WSA was notified and aware of the matter.

Inspector Kline asked Mr. Fullmer if there was an inventory for all fluids currently stored at the Facility. Mr. Fullmer stated Mr. Snyder will have to provide that information. On October 4, 2024, Mr. Snyder sent Inspector Kline an e-mail that contained the current inventory of all fluids **(See Attachment #3)**. Inspector Kline asked Mr. Fullmer if he knew the dates and amounts of wastewater that was discharged from the Facility to the WSA since the March 2024 PCI. Mr. Fullmer stated that Mr. Snyder would have to send that information. On October 4, 2024, Mr. Snyder sent Inspector Kline an e-mail that showed discharge dates and amounts of discharge since March 2024 from the Facility to the WSA **(See Attachment #4)**.

Inspector Kline asked Mr. Fullmer if any radiation monitoring been conducted since the March 2024 PCI. Mr. Fullmer stated that weekly radiation monitoring is conducted at the Facility. On September 30, 2024, Mr. Snyder sent the weekly log from March through September 2024 showing radiation monitoring results **(See Attachment #5)**.

III. Observations

Inspector Kline, Ms. Duffy and Mr. Fullmer conducted a tour of the Facility. Prior to conducting the tour, Ms. Duffy and Inspector Kline had confirmed calibration settings for their Ludlum model 222 Radiation Monitor, serial number 364201 **(See Attachment #1- Photo #2)**. The monitor had calibration certificates dated August 7, 2024 **(See Attachment #1- Photos #3 & #4)**. Ms. Duffy took a background reading in the parking lot of the facility; the background was, 8,900 counts/minute. Ms. Duffy would be the primary operator of this monitor and take readings throughout the Facility during the inspection. Monitoring readings will be listed in the following applicable observations.

Inspector Kline, Ms. Duffy and Mr. Fullmer started the tour outside the Facility along Second Street **(See Attachment #1- Photo #5)**.

Observation #1: The weekly log included column headings of "Normal Operating Exposure Rate (µR/hr)" and "Results (µR/hr)" **(See Attachment #5)**. The data in these two columns included values such as 35/25, 15/25, and 10/25. According to Mr. Snyder, the first number was the reading, and the second number (25) was the scale used on their Ludlum monitor.

Observation #2: Inspector Kline and Ms. Duffy observed two 133,000-gallons ASTs **(See Attachment #1- Photo #6).** According to Mr. Fullmer, the first AST contains untreated Oil and Gas wastewater. Mr. Fullmer called the second AST "Big White", which was located behind the first AST. Mr. Fullmer stated the second AST was approximately 19' full of treated distillate. Inspector Kline observed the data plate on "Big White" **(See Attachment #1- Photo #7).**

Observation #3: Inspector Kline and Ms. Duffy observed the "For Sale" sign posted along Second Street (facing west) **(See Attachment #1- Photo #8)**.

Observation #4: Inspector Kline and Ms. Duffy observed the Methanol Tower, and two methanol ASTs located along Second Street **(See Attachment #1- Photo #9)**. According to Mr. Fullmer, the two ASTs are empty.

Observation #5: Inspector Kline and Ms. Duffy observed the truck unloading bay located adjacent to the Methanol Tower and two methanol ASTs **(See Attachment #1- Photo #10)**. Inspector Kline observed a placard along with "Methanol" labelled on one of two methanol ASTs **(See Attachment #1- Photo #11)**. Inspector Kline and Ms. Duffy

observed assorted totes placed in the methanol AST containment area **(See Attachment #1- Photo #12)**.

Observation #6: Inspector Kline and Ms. Duffy observed the west end outdoor area of the Facility **(See Attachment #1- Photo #13)**. Inspector Kline observed a roll-off container and a disabled triaxle tank truck **(See Attachment #1- Photo #14)**. The roll-off was uncovered and contained scrap metal **(See Attachment #1- Photo #15)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to enter the Facility near the truck unloading bay **(See Attachment #1- Photo #16)**.

Observation #7: Inspector Kline and Ms. Duffy observed the indoor receiving tanks and containment area **(See Attachment #1- Photo #17)**. Ms. Duffy took a radiation reading from this area which was 12,326 counts/minute **(See Attachment #1- Photo #18)**.

Observation #8: Inspector Kline and Ms. Duffy observed four various sized ASTs located near the truck unloading bay. According to Mr. Fullmer, these ASTs contained recovered oil **(See Attachment #1- Photo #19)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to enter the Nomad Area.

Observation #9: Inspector Kline and Ms. Duffy observed an AST labeled "DR1" which according to Mr. Fullmer, contained distillate **(See Attachment #1- Photo #20)**. Inspector Kline and Ms. Duffy observed ten 230-gallon totes which according to Mr. Fullmer, contained recycled oil to be sold for asphalt production **(See Attachment #1- Photos #21 & #22)**. Inspector Kline and Ms. Duffy observed the Nomad unit **(See Attachment #1- Photo #23)**. According to Mr. Fullmer, the Nomad unit is nonoperational and does not work. Inspector Kline observed a standing pool of liquid on the concrete floor **(See Attachment #1- Photo #24)**. Mr. Fullmer stated the liquid was rainwater from the leaky roof. Inspector Kline and Ms. Duffy observed the AST "N" Tanks **(See Attachment #1- Photo #25)**. According to Mr. Fullmer, these tanks are all sized at 26,000-gallons and contain untreated brine. Inspector Kline and Ms. Duffy observed four 26,000-gallon concentrated brine ASTs (CB1 through CB4) (**See Attachment #1- Photo #26)**. Mr. Fullmer stated the oil was already removed from these tanks.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the Receiving Lab **(See Attachment #1- Photo #27)**.

Observation #10: Inspector Kline and Ms. Duffy observed what appeared to be oil samples. Mr. Fullmer stated these were oil retains. Inspector Kline observed one bottle which was dated December 6, 2023 **(See Attachment #1- Photos #28 & #29)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the permitted effluent discharge area **(See Attachment #1- Photo #30)**.

Observation #11: Inspector Kline and Ms. Duffy observed that there was zero-flow being discharged during the inspection. Ms. Duffy took a radiation reading from the discharge pipe which was 11,045 counts/minute **(See Attachment #1- Photo #31)**. Inspector Kline and Ms. Duffy observed an ISCO 4700 refrigerated composite sampler **(See Attachment #1- Photo #32)**. The sampler was powered off, empty, and was not in operation. Ms. Duffy took a radiation reading from this unit which was 10,210 counts/minute. Inspector Kline and Ms. Duffy observed two Hach sc200 flow meters **(See Attachment #1- Photo #33)**. According to Mr. Fullmer, the meter on the left does not work. Mr. Fullmer stated this meter is used for reporting to the WSA. Inspector Kline and Ms. Duffy observed a box of bottles filled with clear liquid **(See Attachment #1- Photo #34)**. Mr. Fullmer stated initially that he did not know the box was there. Mr. Fullmer introduced Inspector Kline and Ms. Duffy to Mr. Dave Thorpe, Operator, who was present at the Facility. Mr. Fullmer asked Mr. Thorpe if he knew what was in the bottles. Mr. Thorpe stated these bottles were discharge sample retains. Ms. Duffy took a radiation reading near the bottles which was 8,620 counts/minute **(See Attachment #1- Photo #35)**. Inspector Kline and Ms. Duffy observed dates on the bottles ranging from 5/12/2024 to 7/23/2024 **(See Attachment #1- Photos #36 & #37)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the Filter Press which was located upstairs near the Discharge Sampling Area.

Observation #12: Inspector Kline and Ms. Duffy observed the filter press. According to Mr. Fullmer, the filter press was not in-use **(See Attachment #1- Photo #38)**.

Observation #13: Ms. Duffy took a radiation reading near the filter press which was 160,572 counts/minute **(See Attachment #1- Photo #39)**. Ms. Duffy took a radiation reading beneath the filter press from the roll-off area which was 25,000 counts/minute **(See Attachment #1- Photo #40)**. Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded upstairs to the clarifier **(See Attachment #1- Photo #41)**. According to Mr. Fullmer, the clarifier does not operate **(See Attachment #1- Photo #42)**.

Observation #14: Adjacent to the clarifier, Inspector Kline and Ms. Duffy observed three bulk storage tanks **(See Attachment #1- Photo #43)**. According to Mr. Fullmer, these tanks were empty and not in-use. Inspector Kline and Ms. Duffy observed each tank individually. The first tank appeared empty and was labelled hydrochloric acid **(See Attachment #1- Photo #44)**. The second tank appeared empty and was labelled ferric chloride **(See Attachment #1- Photo #45)**. The third tank appeared empty and was labelled sodium hydroxide **(See Attachment #1- Photo #46)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the second roll-off area for the filter press **(See Attachment #1- Photo #47)**. According to Mr. Fullmer, this area and filter press are not used.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the pH Adjustment Area which consisted of three ASTs (pH1B, pH2B, and pH3B) **(See Attachment #1- Photo #48)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the "B- Side" Tank Area, which consisted of tanks B-1 through B-10.

> **Observation #15:** Inspector Kline observed an alarm panel which indicated active red-light alarms for "B6" and "B8" **(See Attachment #1- Photo #49)**. Inspector Kline asked Mr. Fullmer if he knew what the alarms indicated. Mr. Fullmer stated the alarm panel was faulty. Ms. Duffy took a radiation reading from the "B-Side" Tank Area which was 51,000 counts/minute. Ms. Duffy took a radiation reading from the "B-Side" Tank Area sump which was 14,000 counts/minute **(See Attachment #1- Photo #50)**.
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> **Observation #16**: Inspector Kline and Ms. Duffy observed a drum and tote storage area near the "A and B-Sides" **(See Attachment #1- Photo #51)**.

Inspector Kline, Ms. Duffy, and Mr. Fullmer proceeded to the "A-Side" which consists of tanks A1 through A10 **(See Attachment #1- Photo #52)**. Mr. Fullmer stated each tank has the same capacity and are full with roughly one foot of freeboard. Inspector Kline observed a sign placed on the side of tank A10 indicating capacity of 26,180 gallons **(See Attachment #1- Photo #53)**.

> **Observation #17**: Ms. Duffy took a radiation reading from the "A-Side" Tank Area which was 170,800 counts/minute **(See Attachment #1- Photo #54)**.

This concluded the physical inspection portion of Eureka.

IV. Closing Conference

Inspector Kline and Ms. Duffy conducted a closing conference with Mr. Fullmer outside near the outdoor unloading area adjacent to "Big White". Both Inspector Kline and Ms. Duffy shared preliminary observations about the facility. Inspector Kline reiterated 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.

V. Follow-up Communications

Inspector Kline received four e-mails from Mr. Snyder 9/30/2024, 10/4/2024, 10/8/2024, and 1/16/2025. In each e-mail, Mr. Snyder provided Inspector Kline with information that had been requested during the inspection.

VI. List of Attachments

Attachment 1: Photograph Log

Attachment 2: Manifest (dated 8/24/2024), from Mr. Snyder's September 30th, 2024, email

Attachment 3: Fluids Inventory, from Mr. Snyder's October 4th, 2024, email

Attachment 4: Discharge (Dates and Amounts) from Eureka to WSA, from Mr. Snyder's October 4th, 2024, email

Attachment 5: Radiation Monitoring Log, March 2024-September 2024