



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 08/29/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment – POTW Inspection
Facility Name: Kiski Valley Water Pollution Control Authority Wastewater Treatment Plant
Permittee(s): Kiski Valley Water Pollution Control Authority (Kiski)
Facility Operator: Kiski Valley Water Pollution Control Authority (Kiski)
Facility Address: 1361 School Rd, Leechburg, PA 15656
Lat/Long: 40.610087/ -79.592074
County/Parish: Armstrong
Permit Number: PA0027626
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN077A

Facility Representative(s): Dennis Duryea – Plant Manager – Kiski
Point of Contact ☒
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I. Introduction

On August 29, 2022, Environmental Protection Agency (EPA) Region 3 representatives Aaron Thomson and Mike Greenwald (hereinafter, “the Inspection Team”), conducted an on-site inspection of the Kiski Valley Water Pollution Control Authority’s (hereinafter, “Kiski”, “the Facility”) pretreatment program. Kiski operates a wastewater treatment facility (“WWTF”) that is subject to the federal pretreatment regulations, the Clean Water Act (“CWA”), and their National Pollutant Discharge Elimination System (“NPDES”) Permit No. PA0027626. Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (“PADEP”). No PADEP representative was present for the inspection. The Inspection Team provided the facility with advance notification of the inspection.

A. Inspection Opening Conference

The Inspection Team arrived at the facility at approximately 8:30 AM for the on-site inspection. The Inspection Team 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
Michael Greenwald	EPA - Philadelphia	215-814-2398	Greenwald.michael@epa.gov
Site/Facility Representatives			
Dennis Duryea	Plant Manager – Kiski	724-568-3655, x 222	dduryea@kvwpca.com

The Inspection Team displayed their credentials to Mr. Duryea at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the federal regulatory requirements at 40 CFR Part 403 and any applicable NPDES Permit requirements pertaining to the Facility’s pretreatment program. A copy of the Permit is provided as **Attachment 1**. The EPA Inspector informed Mr. Duryea 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 80 degrees Fahrenheit.

II. Facility Activity

The facility has an approved pretreatment program, which is subject to the federal pretreatment regulations at 40 CFR Part 403.

The pretreatment program of Kiski is managed by Mr. Duryea. Based on information supplied by Mr. Duryea (**Attachment 2**), the Kiski WWTP design was based on an average dry weather flow of 7 MGD (million gallons per day), a peak dry weather flow of 8.5 MGD and a peak wet weather flow of 31 MGD. Mr. Duryea stated that no major upgrades are currently planned for the Facility.

The Inspection Team asked Mr. Duryea to describe the process for accepting and identifying new industrial users (IU) and their associated categories, if applicable. According to Mr. Duryea, the Engineering firm that created the Industrial Pretreatment program for the Facility is KLH Engineers, who helped identify the Facility's industrial users and create permits to be issued by the Facility to their industrial users. The Inspection Team asked how Mr. Duryea incorporates local limits when identifying new users and how categorical status is determined. Mr. Duryea stated that he was not in possession of the local limits and was unaware of how categorical status applies to industrial users. The Inspection Team asked how Mr. Duryea would survey and identify new or unpermitted users discharging to the Facility. According to Mr. Duryea, the last time an industrial waste survey was conducted was when he started, approximately 10 years ago. Mr. Duryea stated that new users would be given an IU permit application to determine the industries' discharges and was requested by the Inspection Team to provide a copy of this application which has not been provided as of writing this report. Mr. Duryea handles enforcement of their permits, either fining IU's for exceeding their limit, or discontinuing the site's permission to discharge to Kiski as outlined in the Enforcement Response Plan (**Attachment 5**).

Mr. Duryea provided documents detailing 23 users as listed in Attachment 6 and initial walkthroughs (**Attachments 7-20**), which did not include the two permitted users that were visited as part of this inspection, McCutcheon Enterprises, Inc. (hereinafter, "McCutcheon") and Leading Technologies, Inc. (hereinafter "Leading Technologies" or "LT"). Mr. Duryea stated that McCutcheon and Leading Technologies are sampled and inspected by the Facility at least once per year. Mr. Duryea provided copies the most recent inspection reports conducted by the Facility at McCutcheon and Leading Technologies (**Attachments 21-26**). The Inspection Team requested Mr. Duryea provide copies of the sampling chain of custody/analysis documents related with the Facility's inspections, which have not been received as of writing this report. According to Mr. Duryea, McCutcheon self-monitors and reports to the Facility weekly and Leading Technologies self-monitors and reports to the Facility monthly.

During the inspection, Mr. Duryea led the Inspection Team on a brief tour of the Facility. The Inspection Team was led to the influent composite sampler (**Attachment 27, Photograph 12**), including a thermometer reading approximately 5 degrees Celsius (**Attachment 27, Photograph 13, 14**). The Inspection Team was then led to the Facility effluent composite sampler with the thermometer reading approximately 1 degree Celsius at the effluent sampling location

(**Attachment 27, Photograph 15**). The Inspection Team was then led to the pH buffer storage location where containers with 4.0 pH buffer, a 7.0 pH buffer and a 10.0 pH buffer were observed (**Attachment 27, Photograph 16**). At the time of the inspection none of the buffers were expired. This concluded the tour of the Facility.

As part of the pretreatment inspection, The Inspection Team requested Mr. Duryea lead a site visit and inspection of McCutcheon, one of the Facility's IU's. According to Mr. Duryea, McCutcheon, a waste treatment facility, is a significant industrial user (SIU). Mr. Duryea supplied McCutcheon's permit, issued by the Facility, with permitted discharge limits "based on Federal Categorical Pretreatment Standards for Existing Sources under the Central Waste Treatment Category (40 CFR Part 437), Subcategory D (Metals, Organics A & C)" (**Attachment 28**). Mr. Duryea and the Inspection Team were received by Owen Biltz, McCutcheon Compliance Manager upon entering the site. Based on observations during the inspection and statements made by Mr. Biltz, McCutcheon accepts hauled industrial, sludge and septic for treatment. Each load is sampled before treatment, the waste is characterized, and a treatability test is performed. According to Mr. Biltz, Three 25,000-gallon mixing and equalization tanks follow the sludge receiving station. Sludge that has been screened, dewatered and lime stabilized is pumped with two 700 GPM pumps to the equalization tanks. Mr. Biltz stated pH measurements will be taken at the equalization tanks to assure that the required pH has been maintained to stabilize the sludge. If the pH needs to be increased, additional lime slurry will be added at the equalization tank. Based on observations made on site, two sludge thickeners (connected in series) follow each of the three (3) equalization tank. The sludge will be transferred from either of the equalization tanks to any of the thickeners. The supernatant from the thickeners flows by gravity to the final pH monitoring and automatic discharge control system. A discharge pH neutralization and equalization system is located in the containment area. All supernatant flows from the thickeners and other tanks in the system to the discharge pH neutralization and equalization system. This system consists of an equalization tank, mixer, acid feed system and pH monitoring control loop to adjust the supernatant pH prior to discharge to the Facility. According to Mr. Biltz, the production floor is entirely sealed with trenches that can feed any spillage back into the treatment system, or hauled as waste in the scenario that the POTW is unable to accept the wastestream. Mr. Duryea described how the Facility would typically sample from McCutcheon's sampling location (**Attachment 27, Photographs 2, 3 and 5**). This concluded the tour of McCutcheon.

As part of the pretreatment inspection, the Inspection Team requested Mr. Duryea lead a site visit and inspection of Leading Technologies, one of the Facility's IU's. According to Mr. Duryea, Leading Technologies, a metal finishing facility, is a significant industrial user (SIU). Mr. Duryea supplied Leading Technologies' permit, issued by the Facility, with permitted discharge limits "Federal Categorical Pretreatment Standards for New Sources under the Metal Finishing Category (40 CFR Part 433)" (**Attachment 29**). Mr. Duryea and the Inspection Team were received by Dennis Newhouse, Leading Technologies Environmental and Safety Manager upon entering the site. Based on observations during the inspection and statements made by Mr. Newhouse, Leading Technologies is a metal finishing facility including anodization. According to Mr. Newhouse, the processes at Leading Technologies that generates the wastewater that discharges to the facility includes only rinse water from the rinse baths in their anodization lines.

Rinse water from the rinse baths is collected in a neutralization tank where hydrochloric acid and sodium hydroxide are used to balance the pH of the wastewater to permitted discharge levels (**Attachment 27, Photograph 8**). Once permitted pH discharge levels are achieved, the wastewater is directed through the effluent sampling station (**Attachment 27, Photographs 9 and 10**). Mr. Duryea described how the Facility would typically sample from Leading Technologies' sampling location (**Attachment 27, Photograph 9**). According to Mr. Duryea, all samples are taken with a flow-proportional composite sampler, except cyanide which is sampled by taking 4 (four) grab samples over an 8-hour period, per Leading Technologies' permit issued by the Facility. This concluded the tour of Leading Technologies.

A checklist was utilized during the review and is provided as **Attachment 20**. The checklist was completed by the Inspection Team using information provided by Mr. Duryea. Photographs were taken during the inspection by Inspector Thomson. Photographs pertaining to the inspection report are provided in **Attachment 27**.

III.Observations

CFR 40 Part 403.8(f)(2)(i&ii) describes the pretreatment program's requirement to identify and locate all possible industrial users and to identify the character and volume of pollutants contributed by those industrial users.

Observation 1. According to statements made by Mr. Duryea during the inspection, an industrial waste survey has not been conducted since Mr. Duryea took the position of plant manager, roughly 10 years prior to the inspection. When asked by the Inspection Team how industries are assessed for their categorical status, Mr. Duryea stated that he was unaware of the categorical status of his users and he did not know how to determine the status.

CFR 403.8(f)(4) states that "The POTW shall develop local limits as required in § 403.5(c)(1) or demonstrate that they are not necessary.

CFR 40 Part 403.5(c&d) describes prohibited discharges to the POTW including the application of local limits.

The Facility's ERP (**Attachment 5**) states that "The Authority's manager is responsible for ensuring implementation of the pretreatment program as well as for the overall operation of the Authority. The manager is charged with the following administrative responsibilities in specific regard to pretreatment program enforcement... (2nd bullet) notify industrial uses of applicable standards, local limitations, and reporting requirements."

The local ordinance agreement (**Attachment 39**) states "The Kiski Valley Water Pollution Control Authority shall retain the authority to establish, implement, revise and enforce local limits as required by the EPA."

Observation 2. When asked how local limits were considered when creating industrial user permits, Mr. Duryea stated that he was not in possession of the local limits and was unsure what they would be.

The federal regulations at 40 CFR Part 403.6 (Categorical Standards) require that, “National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories will be established as separate regulations under the appropriate subpart of 40 CFR chapter I, subchapter N. These standards, unless specifically noted otherwise, shall be in addition to all applicable pretreatment standards and requirements set forth in this part.”

40 CFR Part 437 identifies Centralized Waste Treatment as a point source category. 40 CFR Part 437.1 require facilities be classified as Central Waste Treatment that engage in the following activity: “Treatment and recovery of hazardous and non-hazardous industrial metal-bearing wastes, oily wastes and organic-bearing wastes received from off-site.”

Observation 3. McCutcheon was being referred to as an SIU by the pretreatment coordinator. The pretreatment coordinator was unsure if the facility is a CIU. The permit includes parameters for CIUs and the IU appears to be subject to the Central Waste Treatment Category (40 CFR Part 437) of the Federal Pretreatment Regulations.

The federal regulations at 40 CFR Part 403.6 (Categorical Standards) require that, “National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories will be established as separate regulations under the appropriate subpart of 40 CFR chapter I, subchapter N. These standards, unless specifically noted otherwise, shall be in addition to all applicable pretreatment standards and requirements set forth in this part.”

40 CFR Part 433 identifies Metal Finishing as a point source category. 40 CFR Part 433 require facilities be classified as a Metal Finishing point source that engage in the following activity: “Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture.”

Observation 4. Leading Technologies was being referred to as an SIU by the pretreatment coordinator. The pretreatment coordinator was unsure if the facility is a CIU. The permit includes parameters for CIUs and the IU appears to be subject to the Metal Finishing Category (40 CFR Part 433) of the Federal Pretreatment Regulations.

40 CFR Part 403.8 (f)(1)(iii)(B)(4) describes the requirement for permits to contain self-monitoring, sampling, reporting, notification and recordkeeping requirements.

40 CFR Part 403.12(f) describes the requirement for all categorical and non-categorical users to notify the POTW immediately of all discharges that could cause problems to the POTW, including any slug loadings, as defined by 403.5(b), by the Industrial User.

Observation 5. The permits issued to McCutcheon and Leading Technologies do not include language specifying the requirement for an industrial user to notify the Control Authority of any change in process that could result in a slug discharge.

40 CFR 403.17 require industrial users to notify the Facility of bypasses.

The preamble to the federal pretreatment regulations stipulates that the permit conditions identified in 40 CFR 403.8 should not be incorporated by reference but rather specifically stated in IU discharge permits.

Observation 6. The permits issued by the Facility to the IU's do not define "bypass" and do not include requirements for the user to notify the Facility of bypasses.

"In order to comply with the discharge limits specified in Section I and the Special Conditions in Section III of this Permit, the Permittee will be required to maintain pretreatment facilities inclusive of all necessary treatment modifications, installations or actions required."

40 C.F.R. §403.8(f)(1)(iii)(B)(4) requires the following: "Self-monitoring, sampling, reporting, notification and recordkeeping requirements, including an identification of the pollutants to be monitored (including the process for seeking a waiver for a pollutant neither present nor expected to be present in the Discharge in accordance with § 403.12(e)(2), or a specific waived pollutant in the case of an individual control mechanism), sampling location, sampling frequency, and sample type, based on the applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law"

Observation 7. The permits issued by the Facility for McCutcheon and Leading Technologies do not have limits for BOD or TSS. Mr. Duryea stated that Kiski will issue surcharges on the basis of flow from IUs for BOD and TSS. Kiski has never assessed a surcharge to McCutcheon or Leading Technologies.

The McCutcheon Control Permit states the following for grab samples: "Minimum of four (4) grab samples shall be collected over the 8-hour discharge period and analyzed separately as required by U.S. EPA NPDES Compliance Monitoring Requirements."

Observation 8. Samples for Cyanide appear to be taken over the course of several days, rather than an 8-hour discharge period. This included the following self-monitoring reports (SMRs) that were submitted in 2022:

September 2022 SMR results shows cyanide samples collected on 9/15/22 at 10:30 am, 9/15/22 at 12:30 PM, 9/20/22 at 11 am, and 9/21/22 at 11 am.

May 2022 SMR results show cyanide samples collected on 5/18/22 at 10:35 am, 5/18/22 at 12:35 pm, 5/19/22 at 9:17 am, and 5/19/22 at 11:30 am.

March 2022 SMR results show cyanide samples collected on 3/23/22 at 8:15 am, 3/23/22 at 10:15 am, 3/24/22 at 9:00 am, and 3/24/22 at 11:00 am.

June 2022 SMR results show cyanide samples collected on 6/1/22 at 9:35 am, 6/1/22 at 11:35 am, 6/6/22 at 9:30 am, and 6/6/22 at 2:15 pm.

July 2022 SMR results show cyanide samples collected on 7/27/22 at 8:20 am, 7/27/22 at 10:20 am, 7/27/22 at 9:55 am, and 7/27/22 at 11:55 am.

January 2022 SMR results show cyanide samples collected on 1/7/22 at 9:00 am, 1/27/22 at 11:00 am, 1/31/22 at 10:00 am, and 1/31/22 at 12:00 PM.

August 2022 SMR results show cyanide samples collected on 8/23/22 at 8:20 am, 8/24/22 at 10:00 am, 8/25/22 at 10:45 am, and 8/26/22 at 9:45 am.

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(5) require permits to contain a “statement of applicable civil and criminal penalties.” Additionally, 40 CFR 403.8(f)(1)(vi)(A) requires the City to have the legal authority to “seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.” In the July 24, 1990, Federal Register, EPA addressed comments pertaining to incorporation by reference to the proposed amendments to 40 CFR Part 403 that which specified minimum criteria for industrial user permits including applicable civil penalties. In the response to comments, EPA specifically stated that “The Agency believes that incorporation by reference is generally not appropriate because of the importance of effective notice to the significant industrial user of all pretreatment requirements contained in the individual control mechanism.” As a result, the final rule was promulgated in November 1990 maintaining the requirement as it exists still today.

Observation 9. Permits issued by the Facility do not contain applicable civil penalties. Section V Paragraph 25 in each Permit outlines criminal penalties, however, does not include civil penalties. The emergency response plan KISKI VALLEY WATER POLLUTION CONTROL AUTHORITY ENFORCEMENT RESPONSE PLAN TABLE V-1 ENFORCEMENT RESPONSE GUIDE MATRIX (**Attachment 5**) similarly contains “criminal penalties” but not “civil penalties.”

40 CFR Part 403.8(f)(2)(v) states that the control authority must “Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year, except as otherwise specified.”

Observation 10. Based on copies of inspections reports conducted at IUs by the Facility (**Attachments 21-26**) and statements made by Mr. Duryea, Facility sampling events are not conducted independently, but are split samples taken of the IU’s self-monitoring events.

40 CFR 403.12(o)(2&3) requires the POTW “to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this

section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User).”

Observation 11. The Facility failed to provide copies of chains of custody and sample analysis documents associated with the Facility’s annual sampling events at their IU’s when requested by the EPA Inspection Team.

IV. Records Review

Prior to the inspection, the Inspection Team requested the following records be submitted via email two weeks before the inspection or up to two weeks after the inspection (see **Attachment 32** for the Records Request):

- Narrative description of the current wastewater treatment process at the facility;
- copies of all NPDES permit applications/permits from past 3 years;
- copies of all discharge monitoring reports for last 3 years; an excel file including a table of all exceedances for effluent limits for NPDES permit for the last 3 years;
- any correspondence with PADEP for the last 3 years regarding formal or informal enforcement actions;
- for each of the identified industrial users (IUs), the IUs permit and/or discharge limit controlling document, categorical status, monthly average flow in gallons per day, spill plans/slug control plans/best management practices plan, copies of the IU self-monitoring reports including lab sample reports for the past 3 years, list of pollutants the POTW samples with identifying details;
- map of service area;
- copies of all local sewer ordinances;
- copies of all intergovernmental sewer agreements;
- standard operating procedures including a description of the POTW’s Industrial User Inventory (Industrial Waste Survey) and Characterization Procedures, copies of the sampling plan/protocol/QAPP, enforcement response plan, and basic IU inspection procedures;
- copies of all inspection reports for the identified IU’s;
- compliance evaluations, compliance reports and notices submitted by the IU’s for the past 3 years;
- copies of all enforcement actions taken against each IU for the past 3 years; each pass through/interference occurrence identified and actions taken to prevent future occurrences

During the inspection, Mr. Duryea provided the following information/documents which were reviewed by the Inspection Team:

- Facility permit (**Attachment 1**);
- Facility Operational Description (**Attachment 2**);
- Facility Plant Process Description (**Attachments 3**);
- Facility Plant Flow Diagram (**Attachment 4**),

- KISKI pretreatment enforcement plan (**Attachment 5**);
- Kiski “user” list (**Attachment 6**);
- Kiski initial IU site visit reports (**Attachments 7-19**);
- ICopies of annual inspection reports conducted at McCutcheon and Leading Technologies by Kiski (**Attachments 21-26**);
- McCutcheon permit issued by Kiski (**Attachment 28**);
- Leading Technologies permit issued by Kiski (**Attachment 29**);
- Kiski Discharge Monitoring Reports (DMR) (**Attachments 33-36, 44 files total**)
- McCutcheon Self-Monitoring Reports (SMR) (**Attachment 37, 84 files total**)
- Leading Technologies SMR (**Attachment 38, 43 files total**)
- Local sewer ordinance (**Attachment 39**)

After the inspection, via email (10/11/23), Inspector Thomson requested copies of McCutcheon and Leading Technologies’ slug control plans, a flow diagram of leading technologies’ wastewater (referenced in their slug control plan), chain of custody and analysis documents related to the Facility’s sampling events at the IU’s and any application/survey/guidance documents they would use to help identify and categorize new users and/or information on the engineering firm contracted by the Facility to create/help create their IU’s permits.

On 10/11/23, Mr. Duryea provided the slug control plans for McCutcheon and Leading Technologies (**Attachments 30 & 31**).

No other documents have been received as of writing this report.

V. Closing Conference

After the facility inspection, the Inspection Team met with the facility representatives for a closing conference. The Inspection Team shared preliminary observations with the facility. The 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. Facility Permit

Attachment 2. KISKI Operational Description

Attachment 3. KISKI Plant Process Description

Attachment 4. KVVPCA Plant Flow Diagram

Attachment 5. pretreatment enforcement plan adopted 7.16.14

Attachment 6. WCIP Customer list

Attachment 7. Accurate Marking - Initial Site Visit Notes 5-5-2015

Attachment 8. BACHARACH

Attachment 9. BALDOR ELECTRIC COMPANY
Attachment 10. INDUSTRIAL AUTOMATION AND CONTROL
Attachment 11. YERECIC LABEL
Attachment 12. LEEDS
Attachment 13. NAMSCO PLASTICS INDUSTRIES
Attachment 14. OUTPUT SALES CORPORATION
Attachment 15. QUALITY MACHINED PRODUCTS
Attachment 16. SIEMENS INDUSTRY INC
Attachment 17. SWANK CONSTRUCTION COMPANY
Attachment 18. WEST PENN TESTING GROUP
Attachment 19. WHITAKER CORPORATION
Attachment 20. PCI Form
Attachment 21. Inspection Report 2020-LT
Attachment 22. Inspection Report 2021-LT
Attachment 23. Inspection Report 2022-LT
Attachment 24. Inspection Report 2021-MEI
Attachment 25. Inspection Report 2022-MEI
Attachment 26. Inspection Report 2023-MEI
Attachment 27. Photo Log
Attachment 28. McCutcheon Permit
Attachment 29. Leading Technologies Permit
Attachment 30. MEI Slug Control Plan Revised 1-2016
Attachment 31. Leading Technologies Slug Plan
Attachment 32. Leading Technologies Slug Plan
Attachment 33. 2020 Kiski DMR (13 Files)
Attachment 34. 2021 Kiski DMR (12 Files)
Attachment 35. 2022 Kiski DMR (12 Files)
Attachment 36. 2023 Kiski DMR (7 Files)
Attachment 37. McCutcheon SMR (84 Files)
Attachment 38. Leading Technologies SMR (43 files)
Attachment 39. KVVPCA PRETREATMENT ORDINANCE Revision 3 Final