



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): 02/03/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment – Industrial User Inspection
Facility Name: Siberline Manufacturing, Inc.

Facility Operator: Jennifer Mermon, Vice President of Operations America
Facility Address: 130 Lincoln Drive
Tamaqua, Pennsylvania 18252
Lat/Long: Lat: 40.828588,
Long -75.988868
County/Parish: Schuylkill

NAICS & SIC Codes: NAICS: 423990, SIC: 3399

Facility Representative(s):	Point of Contact
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Steven Maslowski

March 23, 2022

**Report Preparer
Signature/Date**

Date

Steven Maslowski Acting NPDE Section Chief March 25, 2022

Supervisor

Date

Signature/Date

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I. Introduction

On February 3, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted an on-site of the Silberline Manufacturing, Inc. facility (hereinafter, “the facility and Silberline”)’s pretreatment program. The purpose of the inspection was to observe the program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a request by the Pennsylvania Department of Environmental Protection (PADEP)..

A. Inspection Opening Conference

The EPA Inspection Team began the inspection of the facility at est. 11:10 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			
Steve Maslowski	Enforcement Officer	215-814-2371	Maslowski.steven@epa.gov
Ryan Shuart	Pretreatment Coordinator	215-814-2714	Shuart.ryan@epa.gov
Site/Facility Representatives			
Mary Kate Thomas	Health, Safety, and Environmental Manager	570-068-8485	Thomasm@silberline.com

Mr. Steve Maslowski and Mr. Ryan Shuart displayed their credentials to Ms. Mary Kate Thomas at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspection Team informed Ms. Thomas 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. According to Ms. Thomas some of Silberline’s manufacturing processes are proprietary and requested that the EPA inspection team not take photos of some of its equipment. Silberline recycles its mineral spirits in a still. Ms. Thomas said this is a unique process. At the request of Silberline the photo of the still was not included in the inspection report because of concern with CBI.

B. Weather and Precipitation Conditions

During the inspection, weather was 37 F and raining.

II. Facility Activity/Walkthrough

According to Ms. Thomas, Silberline does not use water that becomes wastewater for manufacturing process at the Lincoln Drive site. According to Ms. Thomas, the Silberline facility is not classified as an significant industrial user (SIU) or a categorical industrial user (CIU), which is subject to the Federal Pretreatment Regulations 40 CFR Part 403. The facility discharges to the Borough of Tamaqua publicly owned treatment works (POTW). Because the facility discharges into a POTW without an approved pretreatment program, EPA is designated as the Control Authority, and as such is the authority for inspections per 40 CFR Part 403.3(f). The Facility is expanding to include new Waterborne facility called the Hometown Special Product Building (HTSPB). According to Ms. Thomas the Waterborne facility has not started production in this new building.

Silberline is a provider of aluminum effect pigments that are used in a wide variety of applications, from automotive paints and printing inks to plastics, protective coatings, and consumer package goods. Some of the Silberline products can be used for coatings in the food package.

The facility's manufacturing process is as follows: The facility manufactures aluminum pigments by combining powered aluminum, mineral spirits, and a fatty acid lubricant in a mill and then processing for a specified period. The resulting material is screened to the correct size, and then filtered and mixed to create the product. The product is the consistency of a paste and is approximately 60-80% aluminum, 20-40% mineral spirits/aromatic solvents, and <1% lubricant. Occasionally products are made without solvents, and the solvent is replaced with a plasticizer, carrier, or resin in a proprietary post-treatment process..

Walk Through

EPA walked through the manufacturing Silberline Facility. The first thing viewed by EPA was aluminum flakes that are discarded during the manufacturing process (Appendix A, Photo 1). Silberline sends products to its Quality Control/Quality Analysis Laboratory (Photo 2) where they look at grain size of the product. Silberline has two sinks in the lab that according to Ms. Thomas, the flow is filtered and then discharged to the used solvent tanks (photo 3). EPA toured the spray booth (Photo 4), which has a carbon absorption unit (PADEP Air Permit # = 54-00041). The waste generated at this location include solvent waste, primarily solvent soaked rags that put into 55-gallon drums and lab solvent of isopropyl alcohol. For Hazardous waste Silberline is a large quantity generator and was inspected last in January 2022 by the Pennsylvania Department of Environmental Protection (PADEP). Chemtron is the hazardous waste hauler.

The manufacturing process aluminum powder is diluted with mineral spirits (D4 or volatile octamethylcyclotetrasiloxane fluid) and lubricant is added and is milled in press room. The product is screened and large pieces that is screened off is sent back to mill room. The mill presses filter cake is put into mixer. The final product is aluminum past that goes to manufacturer as product. Aluminum dust and particles that is generated by this process is vacuumed up and is recycled or reused. Photo 5 shows inside a solid waste container with aluminum dust and trash. Silberline also recycles its mineral spirits in a still. At the request of Silberline the photo of the still was shown in the inspection report because of concern of CBI.

EPA observed eight (8) storage tanks (Photos 6 & 7). Six (6) of these tanks are registered with the PADEP. The facility has the following registered aboveground storage tanks (ASTs):

- Tank 007A: 20,000-gallon Used D-40-Tank Farm
- Tank 008A: 20,000-gallon Reclaimed D-40-Tank Farm
- Tank 009A: 20,000-gallon Used D-40-Tank Farm
- Tank 010A: 20,000-gallon Reclaimed D-40-Tank Farm
- Tank 011A: 20,000-gallon Solgad 100-Tank Farm
- Tank 012A: 20,000-gallon D-40 Mix-Tank Farm

The tank farm is within a concrete secondary containment. According to the Silberline Spill Prevention and Response Plan (Appendix B) (SPRP) this containment can hold approximately 62,836 gallons. Stormwater that accumulates in these containment areas is inspected for indications of oil contamination prior to discharge onto

the ground outside of the containment. This stormwater is drained to an unnamed creek outside of the Facility's fence.

EPA observed the hazardous waste storage area (Photo 8 & 9) with four 55-gallon drums of used solvent in an outdoor storage shed (RCRA permit #: PAD981044704). The waste the facility generates during the manufacturing process include the following:

- 55-gallon drums (approximately 1-2 each quarter) of solvent-based waste. The material is manifested as D0001 (ignitable). The contents include mineral spirits, butanol, methyl-ethyl ketone (MEK), urea formaldehyde resin, toluene, and lacquer thinner.
- 5,000-gallons of non-hazardous still bottoms (generated approximately every 3 weeks) resulting from on-site distillation of mineral spirits used in the milling process at the facility. This material contains 80-95% fatty acids, 5-20% mineral spirits, and trace aluminum. These still bottoms are kept in the still house in steel drums and are contained by the building (Photo 13).
- 55-gallon drums (approximately 1-2 each quarter) of waste from testing aluminum pigments in customers' water-based paint systems. The material is classified as D0001. Contents include aluminum pigments, acrylic, polyester and urethane resins, mineral spirits, alcohol, glycol ethers, and water.
- Rags used for solvent cleanup (D0001).

On the northeast side of the Facility EPA observed a possible stormwater drain (Photo 12). According to Ms. Thomas, there used to be an elevated water tank in place when the previous owner was here which is currently not in use. There are four concrete pads which were for the legs. The metal grade was the open to the underground valve pit with pipes and valves used to fill the tank. Adjacent to the old tank is metal shed where non-hazardous waste is stored (Photo 13).

EPA observed the newly constructed Hometown Special Product Building (HTSPB). According to Ms. Thomas, Silberline has not started production on the second floor of the building. The SPRP lists that 55-gallon drums (approximately 200+) of still bottoms and other waste materials are generated in the HTSPB. In Photo 14 shows an 8-inch sewer line coming down from the second floor in the HTSPB. Ms. Thomas stated this line is not a sanitary line to the sewer. It was incorrectly labeled during construction. It is line from the second floor and connects to the underground storage tank in case of a spill and would be contained. Also viewed in the HTSPB are two floor drains. According to Ms. Thomas the floor drains discharge to underground storage tank in case of a spill (Photo 15). On the west side of the HTSPB are the above ground parts of an underground storage tank (Photo 16). According to Ms. Thomas the floor drains and sewer line from the second floor will discharge to the tank once it is connected.

EPA left the Facility to view the stormwater outlet (Photos 17 -20). Silberline discharge its stormwater into stream located on the southeast side of the facility. The PADEP issued Silberline a stormwater permit for discharge to Outfall 001, which is to an unnamed tributary of Nesquehoning Creek. The permit number is PAS202211 (Appendix C). The effective date is November 1, 2019, and the expiration date is October 31, 2024. The stormwater outlet is located on the southeast side of the facility in a wooded area between the facility and Grove Street.

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 Steve Maslowski, and are provided in Attachment A.

Section 1.				
General Information				
	Yes	No	N/A	Comments
General Description of Processes and Products				
Are there any alternates to effluent monitoring conducted? (e.g., TTO/TOMP, Waiver requirements?) Describe in comments if “yes”	☐	☐	☒	
Provide production rates for all processes subject to production-based standards and include:				
1) Process				
2) production rate used for calculating limits				
3) production rate for last 12 months				
Any anticipated changes in processes or production rates?	☐	☒	☐	
List the production rate listed on the approval letter	NA			
Shift information, list				
1) Shift #: 3				
2) No. of Employees, more than 140				
3) Hours: 24/7				
4) Workdays				
Is production seasonal? If yes, describe	☐	☒	☐	
List all visual observations pertaining to this section				

Section 2.				
Categorical Industry				
	Yes	No	N/A	Comments
Categorical Industry?	☐	☐	☒	
Category(s):	Silberline states it's not a categorical industrial user			
Subcategory(s):	According to the Borough of Tamaqua wastewater treatment plant, Silberline sends very little flow to the plant.			
Regulatory New Source Date:				
New source?	☐	☒	☐	
List of categorical processes	N/A			

List of other operations producing wastewater	N/A
List all visual observations pertaining to this section	Potential applicability in the aluminum forming category however, facility stated that there was no potential for process wastewater to be discharged to the sewer system.

Section 3.				
Characterization of Wastewater Discharges (CFR ##.##.##)				
	Yes	No	N/A	Comments
Describe the time-of-day discharge to sewer occurs	During hours of operation			
Are discharges seasonal (if yes, describe)	☐	☐	☒	
Attach a block flow diagram of manufacturing process in the Facility Activity section of the inspection report, including chemical storage area, and wastewater generated. Identify all regulated, unregulated and dilution wastewater discharges. Include sample location, discharge flow rates and method of disposal*. Note any recent changes. *disposal method CD - Continuous discharge to sanitary ND - Not discharged or disposed BD - Batch discharge to sanitary sewer HH - Hauled as hazardous waste OD - Other disposal - not to sanitary sewer HW - Hauled as nonhazardous waste				
List all visual observations pertaining to this section				
No connection to the sewer system were observed in the production areas.				

Section 4.				
Pretreatment Facility				
	Yes	No	N/A	Comments
Pretreatment installed?	☐	☒	☐	
Attach a schematic of the pretreatment facility in the Facility Activity section of the inspection report (include all units and sludge storage)				
Briefly describe treatment processes and operation.	Silberline stated there is no potential to discharge process wastewater to the collection system			
Describe sludge storage and disposal method	N/A			
Describe appearance of effluent at time of inspection.	N/A			
List all visual observations pertaining to this section	No known Sewer connection in the production area.			

Section 5.

Self-Monitoring				
	Yes	No	N/A	Comments
Does facility have a sampling plan or protocol including use of 40 C.F.R. Part 136 techniques (obtain copy)?	☐	☒	☐	
Is sampling location (identified on block flow diagram) the same as in control mechanism? If no, explain.	☐	☐	☒	
Is this sampling location permanently identified by a sign, painted number, or other means?	☐	☐	☒	
Is this sampling location appropriate? If no, explain...	☐	☐	☐	
Is this sampling location shown on the chain of custody form?	☐	☐	☒	
Are any parameters monitored by approved methods more frequently than required at permitted sampling location?	☐	☐	☒	
If yes to previous question, are all results submitted to the control authority?	☐	☐	☒	
Does facility resample and report within 30 days of discovering a violation?	☐	☐	☒	
Are sampling records maintained on site? Describe for how long.	☐	☐	☒	
Is flow determined as required by permit?	☐	☐	☒	
How is flow determined (i.e., estimated or measured)?	☒			
Is flow measurement appropriate?	☐	☐	☒	
Is flow measurement device calibrated?	☐	☐	☒	
Does the facility have an operator's manual for its pH meters?	☐	☐	☒	
Does the facility do a proper 2-point calibration of its pH meter in accordance with the operator's manual?	☐	☐	☒	
Is other monitoring equipment (e.g. DO meter) calibrated? Describe how often if yes.	☐	☐	☒	
Is sampling and analysis done in-house or by contract? If by contract, list company.	☐	☐	☒	
Is QA/QC program for sampling and analysis adequate? Obtain copy of plan if available.	☐	☐	☒	
List all visual observations pertaining to this section	No pretreatment self-monitoring is required by Tamaqua or EPA			

Section 6.				
Hazardous Waste Management				
	Yes	No	N/A	Comments
Is IU aware of RCRA regulations?	☒	☐	☐	LQG
Does facility generate any hazardous waste? If yes, indicate type of waste, method of management on site and means of disposal on a separate sheet. Describe any spillage problems or any other releases that are observed.	☒	☐	☐	On-site storage, waste is removed by Chemtron for disposal

Has facility notified POTW and EPA of any hazardous waste discharges to the sewer?	☐	☐	☒	Silberline states they have not had any spills
List all visual observations pertaining to this section	D0001 (ignitable) mineral spirits, butanol, methyl-ethyl ketone (MEK), urea formaldehyde resin, toluene, and lacquer thinner.			

Section 7.				
Spill Prevention				
	Yes	No	N/A	Comments
Has the facility had any spills or been responsible for slug loads? List dates of events in comments.	☐	☒	☐	
If yes to previous question, was POTW notified?	☐	☐	☒	
Does the facility have spill notification procedures posted?	☐	☒	☐	
Has the facility evaluated its need for a spill prevention plan at least every two years?	☒	☐	☐	
If yes to previous question, was it determined that they needed one?	☐	☐	☒	
Does the IU have a spill prevention (SP) plan to address spills to the POTW?	☒	☐	☐	
If spills occurred- Did the IU follow procedures outlined in the spill plan at the time of spills?	☐	☐	☒	
If spills occurred- Were procedures effective in containing the spill?	☐	☐	☒	
Is the facility keeping records of spill events?	☐	☐	☒	
Have there been any changes in spill procedures recently. Describe if yes.	☐	☐	☒	The SPCC plan was last updated March 2021
List all visual observations pertaining to this section	Facility representatives stated that no flow drains are connected to the sewer system.			

Section 8.				
Recordkeeping Review.				
	Yes	No	N/A	Comments
Current IU control mechanism (through EPA, not a permit)				
Notices and correspondence with control authority including:				
a. Self-monitoring report transmittals?	☐	☐	☒	
b. BMR if required?	☐	☐	☒	
c. Other?	☐	☐	☒	
Do sampling records include:				
a. Date of sampling event?	☐	☐	☒	

b. Time of sampling event?	☐	☐	☒	
c. Name of sampling person and affiliation?	☐	☐	☒	
d. Sample collection method?	☐	☐	☒	
e. Method of sample preservation?	☐	☐	☒	
f. Description of sample location?	☐	☐	☒	
g. Name of person conducting analysis?	☐	☐	☒	
h. Date of analysis?	☐	☐	☒	
i. Time of analysis, if applicable (i.e., BOD, Cr?)	☐	☐	☒	
j. Sample analysis method?	☐	☐	☒	
Is type of sample specified in control mechanism?	☐	☐	☒	
Are all parameters monitored at the required frequency? Note any discrepancies in comments.	☐	☐	☒	
Analytical results?	☐	☐	☒	
Are all monitoring results sent to the Control Authority?	☐	☐	☒	
Are copies sent to the POTW?	☐	☐	☒	
Appropriate production records for production-based standards?	☐	☐	☒	
Documentation of flow rates and volumes?	☐	☐	☒	
Are records maintained at least 3 years?	☐	☐	☒	
List all visual observations pertaining to this section	No pretreatment self-monitoring is required by Tamaqua or EPA			

Section 9.				
EPA Sampling				
	Yes	No	N/A	Comments
Were samples taken?	☐	☐	☒	
Describe sampling location, method, and time:				
List all visual observations pertaining to this section	N/A			

Section 10.				
Stormwater				
	Yes	No	N/A	Comments
Does facility have a stormwater permit?	☒	☐	☐	
If yes, describe what type of permit along with issuance and expiration dates	Industrial Stormwater permit (PAS202211). The effective date is November 1, 2019, and the expiration date is October 31, 2024.			
Does facility have a stormwater pollution prevention plan?	☐	☒	☐	
Describe any BMPs that the facility is currently implementing.	Did not observe any BMPs			
List all visual observations pertaining to this section				

Section 11.				
Current Compliance Status				
	Yes	No	N/A	Comments

Indicate compliance with:				
a. effluent limits (indicate in comments the date range reviewed)	☐	☐	☒	
b. monitoring (indicate in comments the date range reviewed)	☐	☐	☒	
c. recordkeeping/reporting (indicate in comments the date range and records reviewed)	☐	☐	☒	
List all visual observations pertaining to this section				

IV. Records Review

As part of the inspection, the EPA Inspection Team requested the following documentation: Spill Prevention Control and Counter Measure Plan and the Preparedness Prevention and Contingency Spill Preventive Response Plan. Records relevant to the inspection report are attached.

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 that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at 1:00 pm.

VI. List of Attachments

Appendix A. Photography Log

Appendix B. Spill Prevention and Response Plan

Appendix C. Industrial Stormwater Permit

Appendix D. Preparedness Prevention and Contingency Spill Prevention Response Plan