REGION 3

PHILADELPHIA, PA 19103

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	April 30, 2024
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment Industrial User Inspection
Facility Name:	Corry Fabrication
Facility Address:	21 Maple Avenue, Corry, PA 16407
Facility Latitude:	41.92167° N
Facility Longitude:	-79.63877° W
County/Parish:	Erie County
Permit No:	PAP328223
NAICS Code:	332117
SIC:	3471
Unique Project #:	ECAD-491

Facility Representative(s): **Point of Contact**

Mitchell Anderson, Corry Fabrication ☒
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Joe Futcher, Corry Fabrication
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Inspectors:

Chuck Durham, Eastern Research Group
Email: chuck.durham@erg.com

(Full list of additional attendees in Table 1)

Report Preparer Signature/Date — Chuck Durham, Eastern Research Group — 7/2/2024 Date

Supervisor Signature/Date

MICHAEL GREENWALD
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Date: 2024.07.03 08:52:39 -04'00'

Mike Greenwald, NPDES 1 Acting Section Chief — Date
EPA Region 3 Enforcement and Compliance Assurance Division

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I. INTRODUCTION

On April 30, 2024, a representative from EPA Region 3's contractor, Eastern Research Group, and a representative from EPA Region 3 (hereinafter, referred to as the Inspection Team) conducted an industrial user pretreatment inspection at Corry Fabrication (hereinafter, Facility) in Corry, Pennsylvania. The purpose of the inspection was to evaluate compliance with the requirements of the *Federal Pretreatment Regulations at Title 40 of the Code of Federal Regulations*. The inspection also evaluated compliance with Industrial User Requirements in the Facility's authorization to discharge (PAP328223; Appendix A) issued by EPA Region 3 in February 2007. The inspection consisted of conversations with facility personnel and an inspection of the facility's process area, wastewater generating processes, discharge and sampling location, and chemical storage area.

The Facility is located at 21 Maple Avenue, Corry, PA. The Facility is a metal finisher that produces metal cabinets and consists of two plants (Plant 1 and Plant 2). The Facility employs 68 staff. The Facility notified EPA Region 3 of a change in ownership in September 2020. According to the Facility representatives, there had been no recent physical or process changes to the Facility at the time of the inspection, and none were planned.

The Facility performs monthly on-site analysis of pH using a continuous pH meter. The pH meter is calibrated weekly. AG Aegis Company, the Facility's contractor, conducts sampling at the designated sampling points once every six months for cadmium, chromium, copper, lead, nickel, silver, zinc, cyanide, and total toxic organics (TTO). Samples are analyzed by Pace Analytical. Samples for Plant 1 are collected after the final rinse tanks on the five-stage washer system. Samples for Plant 2 are collected either after the final rinse tanks on the three-stage washer system or outside the Facility (see Observation 3 below). Photographs taken during the inspection are included in Appendix B (Photograph Log) and specific photos related to observations will be specified in the Summary of Observations section of this report below.

II. INSPECTION PROCESS

Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 1:00 PM (EDT) for the inspection. Mr. Chuck Durham of Eastern Research Group and Ms. Erin DeSandro of EPA Region III displayed their Clean Water Act inspector credentials to the Facility representatives upon entry and explained the primary purpose of the inspection was to evaluate the Facility's compliance relevant to the Permit requirements. The Inspection Team explained 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 EPA's CBI procedures. Table 1 lists the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Chuck Durham, Inspector	Eastern Research Group	(615) 888-2928	chuck.durham@erg.com
Erin Desandro, Inspector	EPA Region 3	(215) 814-2125	Desandro.Erin@epa.gov
Facility Representatives			
Mitchell Anderson	Plant Manager	(814) 665-8221	m.anderson@corryfab.com
Joe Futcher	President	Not provided	joe.futcher@gmail.com

During the opening conference, the Facility representative informed the Inspection Team that process wastewater is discharged to the City of Corry Wastewater Treatment Plant. The City of Corry does not have an approved pretreatment program and does not issue permits for its industrial contributors. However, the Facility was notified of applicable limits and monitoring requirements in a February 2007 authorization to discharge letter from EPA Region 3. Process wastewater consists of rinse tanks from the three-stage and five-stage washers that are part of the Facility's powder coating lines. For the July – December 2023 reporting period, the Facility reported average flows of 156 gallons per day (gpd) from the three-stage washer, 311 gpd from the five-stage washer, and 35 gpd from the spray wand.

The Facility representative stated that the Facility does not generate hazardous waste. Clean Harbors hauls off-site for disposal non-hazardous waste including used oil and antifreeze.

Facility Inspection

As part of the inspection, the Inspection Team visually observed and photographed Facility conditions in the presence of the Facility representatives (refer to Appendix B, Photographs 1 through 13).

The Inspection Team began the Facility inspection in Plant 1. The Facility receives steel sheets and aluminum sheets. The cabinet parts are formed using various metal forming and fabricating operations including laser cutting, brake pressing, and welding. Parts are then sent through the five-stage washer system, which consists of the following stages:

- Stage 1 – not in use
- Stage 2 – not in use
- Stage 3 – phosphate wash (CM828-J phosphating solution)
- Stage 4 – City water rinse
- Stage 5 – City water rinse

After the five-stage washer, parts are powder coated and dried.

The Inspection Team also viewed the Plant 1 sampling point (Photograph 9-Appendix B), located after the final rinse tanks on the five-stage washer system.

Plant 2 contains the three-stage wash system and an adjacent manual wash line with 2 spray booths used for phosphate wash and rinse and is used for washing larger parts. The three-stage washer system consists of the following stages:

- Stage 1 – phosphate wash (CM828-J phosphating solution)
- Stage 2 – City water rinse (deionized water rinse)
- Stage 3 – City water rinse

After the three-stage washer, parts are powder coated and dried.

The Facility representative was unable to confirm the specific sampling location used by the contract laboratory for semiannual compliance monitoring for Plant 2. The Inspection Team did however view the two potential sites for sample collection, identified by the Facility representatives as either after the final rinse tanks on the three-stage washer system or outside the Facility (see Observation 3 below).

The inspection team observed multiple satellite chemical storage locations during the walk-through (Photographs 1-2 in Appendix B). In all cases, proper labeling of chemicals and proper containment procedures were observed. No concerns with chemical storage were identified. Waste oils and solvents are shipped off-site for disposal by Safety Kleen.

Records Review

The Inspection Team reviewed records pertaining to pretreatment requirements. All of the records requested were available for review at the Facility, except as noted in the Closing Conference section below. The following records were reviewed onsite:

- Self-monitoring reports for 2022-2023
- Copy of the Facility's flow diagram
- Copy of the Facility's last used oil disposal manifest

Summary of Observations

The following section summarizes the Inspection Team's observations relative to the Facility's pretreatment requirements.

Iron Phosphate Cleanout

During the opening conference, Facility representatives indicated that the iron phosphate tanks are cleaned out approximately once every six months.

Observation 1. The Facility representatives stated that the iron phosphate tank is cleaned out approximately once every six months and the tank contents are sent to the City via the same discharge as normal process wastewater. The Facility

representatives further noted that historically there has been no consideration to scheduling sample collection during this cleanout process. Because the Facility's contractor collects samples once every six months, the Facility should take appropriate actions to ensure that the samples are taken on a date that would capture discharge from the iron phosphate cleanout to ensure compliance with federal discharge standards for this concentrated wastestream.

Self-Monitoring

The Facility's July – December 2023 self-monitoring report indicated that samples were analyzed with an improper analytical method.

Observation 2. The Facility's July – December 2023 self-monitoring report indicates that cadmium, chromium, copper, lead, nickel, silver, and zinc were analyzed using EPA Method 6010d. However, this method is not listed in 40 CFR Part 136. The federal regulations at 40 CFR 403.12(b)(5)(v) require self-monitoring samples to be analyzed using test methods listed in 40 CFR Part 136.

Sample Point for Plant 2

The Facility's representatives were not sure of the correct sample point for Plant 2 and the Inspection Team noted concerns pertaining to representative sampling at each of these locations.

Observation 3. During the walk through of the Facility, the Facility representatives were unsure if the Facility's contractor collects self-monitoring samples from the pit after the final rinse tank of the three-stage washer or if samples are collected from a monitoring point outside the building. The sample point in the pit does not capture discharge from the adjacent spray booth, therefore not capturing all regulated wastestreams. The outside sample point captures process wastewater from Plant 2 and the spray booth, as well as stormwater from three sources and wastewater from one unknown source (Photograph 13-Appendix B). Therefore, the outside sampling location captures all regulated wastestreams but also captures unregulated or dilute wastestreams, which would facilitate the need to apply the combined wastestream formula to evaluate compliance with 40 CFR 433.17.

During the closing conference, the Facility representative provided a copy of the Discharge Schematic (Appendix C). This schematic identifies a separate monitoring point for the spray booth, for a total of three sample points. This contradicts the information provided during the walk-through portion of the inspection.

The Facility should take appropriate actions to ensure that self-monitoring samples capture all process wastewater. If dilute or unregulated wastestreams are included in the sample point, the combined wastestream formula should be used to adjust the categorical standards. 40 CFR 403.12(e)&(g) specifies monitoring requirements for categorical industries discharging to a POTW and stipulates samples are to be representative of the discharge and capture all regulated processes.

Plant 1 Discharge Pit

The Facility's representatives were unsure of all possible discharge sources into the pit in Plant 1.

Observation 4. During the walk-through of the Facility, the Inspection Team observed what appeared to be two inlet valves discharging into the discharge pit coming from Tank 1 (Photograph 12-Appendix B). The Facility should confirm whether or not these valves discharge. If this is a source of process wastewater discharge, the Facility should ensure that this discharge is captured during self-monitoring.

pH Meter Calibration

The Facility was conducting weekly pH meter calibrations with buffer solutions that did not have expiration dates on the outside of the bottles.

Observation 5. During the walk-through of the Facility, the Inspection Team observed the Facility's pH 7 and 10 buffer solutions used to calibrate the pH meter weekly. However, the buffer solution bottles did not have expiration dates. Therefore, it was unknown if the buffer solutions were expired at the time of the inspection. The Facility should take appropriate actions to ensure that buffer solutions used are within date.

Closing Conference

After the Facility inspection, the Inspection Team met with the Facility representatives for a closing conference and shared their preliminary observations. The Inspection Team reiterated to the Facility representative that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the Inspection Team 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, as a result of reviewing additional documentation following the inspection.

During the closing conference, the Inspection Team asked that Facility representative provide the following additional documentation for review. Both requested documents were provided via email on 4/30/2024 and 5/6/2024, respectively. The Inspection Team reviewed them and did not identify any concerns.

- Toxic Organic Management Plan (TOMP).
- Safety Data Sheet for chemicals used in the wash bay.

The inspection concluded at approximately 4:00 PM (EDT).