



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

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): September 17-18, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Facility Name: Altoona Easterly Sewage Treatment Plant
Permittee(s): Altoona Water Authority
Site/Facility Operator: Altoona Water Authority
Facility Address: 1552 Old 6th Avenue Altoona, PA. 16601
Lat/Long: 40.55446, -78.363879
County/Parish: Blair
Permit Number: PA0027014
NAICS & SIC Codes: 221320/4952
Unique Project #: ECAD-445

Facility Representative: Josh Wyandt, Environmental Services Manager
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I. Introduction

On September 17-18, 2024, the United States Environmental Protection Agency, Region 3 (“EPA”) conducted an onsite Pretreatment Compliance Inspection (PCI) of the Altoona Easterly Sewage Treatment Plant (hereinafter, “Altoona Easterly STP”). The Altoona Easterly STP is located at 1552 Old 6th Avenue Altoona, PA. 16601. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) permit ID: PA0027014. The 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.

Inspector Kline provided advance inspection notice to Mr. Josh Wyandt, Environmental Services Manager. Mr. Wyandt’s office is located at the Altoona Westerly Sewage Treatment Plant (STP) at 144 Westerly Treatment Plant Road in Duncansville, PA, 16635. Mr. Wyandt is responsible for pretreatment operations at both the Easterly and Westerly STPs. According to Mr. Wyandt, all pretreatment files are kept at the Altoona Westerly STP.

A. Altoona Easterly STP - Opening Conference

Inspector Kline arrived at the Altoona Westerly STP at 9:00AM on Tuesday September 17, 2024. Upon arrival, Inspector Kline presented his credentials to Mr. Wyandt. Inspector Kline proceeded to conduct the Altoona Easterly STP Opening Conference with Mr. Wyandt in his office. The weather conditions were partly cloudy, and temperatures were in the upper 60s.

Inspector Kline informed Mr. Wyandt that any information that he deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. Inspector Kline informed Mr. Wyandt that photographs would be taken during the inspection (photographs are provided in **Attachment #1** of this report).

B. Altoona Easterly STP - Background Information

The Altoona Easterly STP is a wastewater treatment plant, owned and operated by the Altoona Water Authority (AWA). The AWA also oversees operation of the Altoona Westerly STP. The Altoona Westerly STP was not subject to this inspection. According to the PADEP-issued NPDES Permit (NPDES Permit No. PA0027014), the Altoona Easterly STP has a hydraulic capacity of 16 million gallons per day. Average discharge of Altoona Easterly STP is approximately 9 million gallons per day. The Altoona Easterly STP discharges to the Little Juniata River. The NPDES permit was effective October 1, 2021, and expires September 30, 2026, (**See Attachment #2**).

The AWA has a jurisdictional agreement with Logan Township. Inspector Kline requested and received a copy of the Intermunicipal Wastewater Treatment and Conveyance Service Agreement from 2003 (**See Attachment #3**).

Inspector Kline asked when the last time the Altoona Easterly STP evaluated their local limits for the Pretreatment Program. Mr. Wyandt stated the local limits were approved in January 2023. Inspector Kline asked Mr. Wyandt if the Altoona Easterly STP was current with all EPA annual reporting requirements. Mr. Wyandt stated the Altoona Easterly STP is current and has not been late with annual reporting. The most recent Annual Report that the Altoona Easterly STP submitted was for the January 1st to December 31st, 2023, Reporting Period (**See Attachment #4**).

Mr. Wyandt stated the Altoona Easterly STP does not accept hauled-in wastes. According to Mr. Wyandt, all biosolids generated are hauled and land applied by the AWA at either of two local farms located in Pinecroft and Bellwood, Pennsylvania.

Inspector Kline asked Mr. Wyandt if the Altoona Easterly STP had a Fats Oil and Grease (FOG) Program. Mr. Wyandt stated they do have a FOG Program that he oversees. Mr. Wyandt stated the FOG Program has 130 restaurants that are permitted and surcharged. Mr. Wyandt added he inspects each of the restaurant grease traps annually.

C. Altoona Easterly STP - Industrial Pretreatment Program File Review

Inspector Kline conducted an Industrial Pretreatment Program File Review of the Altoona Easterly STP. According to Mr. Wyandt, the Altoona Easterly STP has seven permitted industrial users (IUs). The following table contains the IU name, address, and permit issuance, effective, and expiration dates:

IU	Address	Issued Date	Effective Date	Expiration Date
Delta Quarries & Disposal, Inc.	Old Sixth Ave, Altoona, PA 16603	7/26/2022	8/1/2022	7/31/2025
Lumax Industries, Inc.	P.O. Box 991 Altoona, PA 16603	4/26/2023	5/1/2023	4/30/2026
Monarch Carpet Cleaners, Inc.	1401 Valley View Blvd. Altoona, PA 16602	3/14/2023	3/17/2023	3/16/2026
Norfolk Southern Corporation	200 North 4th Ave, Altoona, PA 16601	2/28/2022	3/1/2022	2/28/2025
Union Tank Car Company	P.O. Box 2003, 601 Chestnut Avenue, Altoona, PA 16603	5/27/2022	8/1/2022	7/31/2025
UPMC Altoona Campus	Howard Ave & 7th Street, Altoona, PA 16603	6/29/2023	7/1/2023	6/30/2026
Ward Trucking Company	P.O. Box 1553, Altoona, PA 16603	2/14/2023	2/11/2023	2/10/2026

Inspector Kline asked Mr. Wyandt how the Altoona Easterly STP identifies potential industrial users. Mr. Wyandt stated he works Code Enforcement who reviews building permit applications to screen for new industrial activity. Mr. Wyandt stated once a facility has been identified as having the potential to be a permitted IU facility, an industrial discharge survey form would be sent to the location. Mr. Wyandt provided a copy of the survey form that is mailed out to the facility **(See Attachment #5)**.

Inspector Kline asked Mr. Wyandt if IU inspections and/or sampling are conducted by the AWA. Mr. Wyandt stated announced inspections are conducted annually by the AWA. Mr. Wyandt added all IUs are sampled by Mr. Josh Klausman, Pretreatment Biosolids Technician for AWA. Inspector Kline asked if these sampling events were announced. Mr. Wyandt stated the sampling events were all unannounced. Mr. Wyandt stated the sample analysis is conducted by Pace Analytical Lab in Altoona.

Inspector Kline asked Mr. Wyandt if any of IUs had permit parameter exceedances in the past three years. Mr. Wyandt stated five permitted IUs had exceedances in the previous three years. Inspector Kline asked if the Altoona Easterly STP took enforcement actions for any of the permit violations. Mr. Wyandt stated in accordance with their Penalty Matrix **(See Attachment #6 pg. 99)**, they sent a Notice of Violation for each incident and assessed monetary penalties when appropriate. Inspector Kline asked Mr. Wyandt if the Altoona Easterly STP had an Enforcement Response Plan, or a document used for IU enforcement actions. Mr. Wyandt stated this information is found in their Wastewater Division Rates, Rules and Regulation Governing the Service of Wastewater Policy which was last revised September 21, 2023 **(See Attachment #6)**.

Mr. Wyandt stated Norfolk Southern Corporation had received notices of violations (NOVs) along with fines for copper and lead exceedances. According to Mr. Wyandt, in 2023, the total fines for those exceedances were \$14,000.00; in 2022, the total fines were \$11,000.00; and in 2021, the total fines were \$12,000.00. Mr. Wyandt stated he had been monitoring and working closely with Norfolk Southern Corporation to address the exceedances. Mr. Wyandt stated Norfolk Southern is in the process of building an entirely new pretreatment system, which is being built with completion scheduled by the first quarter of 2025 and fully operational by the third quarter that same year.

Mr. Wyandt stated four other permitted IUs had exceedances in the previous three years. According to Mr. Wyandt, Monarch Carpet Cleaners, Inc. had three pH exceedances in 2021 resulting in a \$5,000 fine, one pH exceedance in 2022, and a pH and copper exceedance in 2023. Mr. Wyandt stated NOVs were sent to Union Tank Car Company for pH exceedances on March 11, 2020, and August 2, 2019. Mr. Wyandt stated the UPMC Campus received NOVs in 2021 for separate copper and lead exceedances. Lastly, Mr. Wyandt stated NOVs went out to Ward Trucking Company for two pH exceedances in 2023 resulting in a \$1,500 fine, and three pH exceedances in 2022 resulting in a \$2,000 fine.

Inspector Kline requested and received copies of the IU Permits issued to Norfolk Southern Corporation **(See Attachment #7)** and Union Tank Car Company **(See Attachment #8)**. Inspector Kline requested and received the 2023 Inspection Reports for Norfolk Southern Corporation **(See Attachment #9)** and Union Tank Car Company **(See Attachment #10)**. As part of the PCI, Inspector Kline selected both Norfolk Southern Corporation and Union Tank Car Company for the IU tour portions of the inspection. Inspector Kline decided that Norfolk Southern Corporation would be inspected on September 18, 2024, at 8:30AM, and Union Tank Car Company would be inspected on September 18, 2024, at 12:30PM.

Inspector Kline completed the Field Audit Checklist with input from Mr. Wyandt **(See Attachment #11)**. This concluded the PCI for the day.

II. IU Inspection- Norfolk Southern Corporation

A. Norfolk Southern Corporation - Opening Conference

Inspector Kline and Mr. Wyandt arrived at Norfolk Southern Corporation located at 200 North Fourth Ave in Altoona (**See Attachment #1- Photos #1 & #2**) at 8:30 AM on September 18, 2024. Inspector Kline presented his credentials to Mr. Gregory Calhoun, Manager Environmental Operations at the outset of the inspection. The weather conditions were cloudy, and temperatures were in the lower 60s.

Inspector Kline conducted an Opening Conference in Mr. Calhoun's office. During the Opening Conference, Inspector Kline informed Mr. Calhoun that any information that he deemed to be confidential business information ("CBI") should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA's CBI procedures. During the inspection, Mr. Calhoun did not identify or make any CBI claims. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Altoona Easterly STP Pretreatment Program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Norfolk Southern Corporation - Background Information

Inspector Kline asked Mr. Calhoun to provide a brief description of their facility and what Norfolk Southern Corporation does at this location. Mr. Calhoun stated this facility sits on roughly 135 acres and is a heavy locomotive maintenance facility, ranging from complete major engine overhauls, painting to maintenance. Inspector Kline asked Mr. Calhoun if tank or railcars were also repaired at this location. Mr. Calhoun stated this location is strictly for locomotives. According to Mr. Calhoun, the Norfolk Southern Corporation headquarters is located in Atlanta, Georgia.

Inspector Kline asked, in addition to the IU Permit issued by the Altoona Easterly STP, does Norfolk Southern Corporation have other permits or generate hazardous wastes. Mr. Calhoun stated this location is a large quantity generator (LQG) of hazardous wastes. Mr. Calhoun stated in addition to generating hazardous wastes, Norfolk Southern Corporation has an Air Permit issued by the PADEP.

Inspector Kline asked Mr. Calhoun how many employees are at this Norfolk Southern Corporation location. Mr. Calhoun stated there are approximately 450 full-time employees. According to Mr. Calhoun the majority of employees cover the first shift from 7:00AM until 3:00PM and second shift starting from 3:00PM until 11:00PM. Mr. Calhoun added there are roughly 20 employees covering the third shift for around the clock coverage.

Inspector Kline asked Mr. Calhoun to describe where the wastewater is generated at the Norfolk Southern Corporation. Mr. Calhoun stated wastewater is generated from the various areas throughout the facility through a system of floor drains that discharge to the wastewater treatment system. Mr. Calhoun stated the largest amount of wastewater is generated through the washing of the engine parts. Mr. Calhoun stated they utilize a Proceco parts washers which use a caustic-based detergent along with water that discharges to the wastewater

treatment system. Mr. Calhoun added all containment dikes, fueling pads and industrial areas are also piped to the wastewater treatment system.

Inspector Kline asked Mr. Calhoun to describe the wastewater treatment system. Mr. Calhoun stated wastewater is collected in a holding tank, which is then screened prior to the API oil water separator. Wastewater is directed to the equalization tank, where the pH is then adjusted. Flocculants are then added to the wastewater prior to being sent to a belt filter press for the removal of solids and dewatering. Wastewater is then directed to the clarifiers. A dissolved air flotation system is utilized in the clarifiers. Then the wastewater is batch-discharged and sent to the Altoona Easterly STP.

Inspector Kline asked Mr. Calhoun to describe sampling procedures at the Norfolk Southern Corporation, and who conducts the analytical analysis for sampling. Mr. Calhoun stated pH, biochemical oxygen demand (BOD), chemical oxygen demand (COD), and oil and grease are sampled weekly, and metals are sampled twice monthly. Mr. Calhoun stated Pace Analytical provides the sample bottles and picks up the samples for analytical analysis. Inspector Kline asked how long it takes the lab to return the analytical report. Mr. Calhoun stated the reports are typically returned within a week to a week and a half.

Mr. Calhoun stated that they have decided to upgrade and construct a new wastewater treatment facility primarily due to the age of their operations and were not under an order to do so by the AWA. Mr. Calhoun stated Mr. Wyandt has been invited and has attended scheduled pre-construction meetings so both parties are current and aware of construction timelines.

Inspector Kline randomly selected analytical test results from the May 7, 2024, sampling event to review (**See Attachment #12**).

C. Norfolk Southern Corporation - Observations

Inspector Kline requested to tour the Norfolk Southern Corporation Facility. Accompanying Inspector Kline on the tour were: Mr. Calhoun and Mr. Wyandt.

Observation #1: The first building visited was the West Hoover Cleaning Shed. Inspector Kline observed containment in this area. Mr. Calhoun stated the containment is cleaned out by vac-truck and delivered to wastewater treatment.

Observation #2: Inspector Kline toured the “Back Shop.” Inspector Kline and Mr. Wyandt were introduced to Mr. Wayne Berkey, Engine Strip Worker. Mr. Berkey showed Inspector Kline and Mr. Wyandt the Proceco heavy-duty parts washer used to clean locomotive engines (**See Attachment #1- Photos #3 & #4**). Mr. Calhoun stated this, and all other parts washers are piped to the wastewater treatment area.

Observation #3: Inspector Kline toured the Wastewater Treatment Area. Inspector Kline observed the buffer solutions used for pH calibration. Inspector Kline observed containers of 4, 7, and 10 buffer solutions. The 10-buffer solution expired in January 2024 (**See Attachment #1- Photo #5**). Mr. Calhoun stated the pH testing was only for internal quality control and was not for sample collection reporting.

Observation #4: The final stop was at the wastewater effluent sampling location. Inspector Kline observed an outdoor effluent monitoring station (**See Attachment #1- Photo #6**). Mr. Calhoun opened the outdoor monitoring station. Inspector Kline observed an ISCO Model 3710 composite sampler

which appeared to be powered off. Mr. Calhoun verified that samples were not scheduled to be taken and the unit was powered off. Inspector Kline also observed an ISCO Signature Flow Meter. This unit was energized, and the screen indicated a 30.33-gallon/per minute discharge rate (**See Attachment #1- Photo #7**). This meter had a calibration sticker indicating calibration was performed on October 17, 2023, by Watermen.

Observation #5: Inspector Kline observed the open-top concrete-constructed effluent sump, which was located adjacent to the outdoor effluent monitoring station (**See Attachment #1- Photo #8**). Both Mr. Calhoun and Mr. Wyandt verified this was the permitted sampling location. The effluent appeared cloudy and grey in color. Mr. Calhoun stated this was typically how the effluent looked.

Observation #6: From the outdoor effluent monitoring station, Mr. Calhoun pointed to the direction where the new wastewater treatment facility was being constructed. From a distance, Inspector Kline observed a crane and an active work crew in this area (**See Attachment #1- Photo #9**). Mr. Calhoun referred to this area as the East Farm in the Rose Yard Area.

This concluded the physical inspection portion of Norfolk Southern Corporation. Inspector Kline and Mr. Calhoun left this location at approximately 11:30AM.

III. IU Inspection- Union Tank Car Company

A. Union Tank Car Company - Opening Conference

Inspector Kline and Mr. Wyandt arrived at Union Tank Car Corporation located at 601 Chestnut Avenue in Altoona (**See Attachment #1- Photo #10**) at 12:30 PM on September 18, 2024. Inspector Kline presented his credentials to Mr. Rodney Shubert, Repair Manager, Mr. Eric Ulery, Cleaning Rack Supervisor, and Mr. Keith Burk, Plant Manager, at the outset of the inspection. The weather conditions were cloudy with slight rain and temperatures were in the mid-60s.

Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed Mr. Shubert, Mr. Ulery, and Mr. Burk that any information they deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. During the inspection, neither Mr. Shubert, Mr. Ulery, nor Mr. Burk identified CBI. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Altoona Easterly STP Pretreatment Program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Union Tank Car Company- Background Information

Inspector Kline asked Mr. Shubert, Mr. Ulery, and Mr. Burk to provide a brief description of their facility and what Union Tank Car Company does at this location. Mr. Burk stated Union Tank Car Company owns the

largest tank car fleet in North America. According to Mr. Burk, the tank cars are leased, and the tank cars are brought to this facility for maintenance, painting, coating, and/or repair. Mr. Burk stated Union Tank Car Company manufacturers the tank cars in Louisiana and their headquarters is located in Chicago.

Inspector Kline asked Mr. Burk if operations at this location were subject to 40 CFR Part 442- Transportation Equipment Cleaning (TEC), which is an industrial category that has categorical pretreatment standards. Mr. Burk contacted Mr. Dave Modrowski, Senior Environmental Specialist and Mr. Gary Fontenot, Senior Safety Specialist via telephone conference. Both Mr. Modrowski and Mr. Fontenot stated they only perform cleaning for maintenance and repairs operations and are excluded from TEC pretreatment standards. Mr. Modrowski and Mr. Fontenot added a determination had been made that their operations were excluded from TEC pretreatment standards. Mr. Modrowski and Mr. Fontenot provided a letter, time stamped June 9, 2010, from the Louisiana Department of Environmental Quality (LDEQ) addressed to the Union Tank Car Company in Louisiana (**See Attachment #13**). In this letter, the LDEQ concurred with the TEC exclusion for operations for the Union Tank Car Company located in Ville Platt, Louisiana.

In addition to the IU Permit issued by the Altoona Easterly STP, Inspector Kline asked if Union Tank Car Company has other permits or generates hazardous wastes. Mr. Burk stated they do have an above-ground storage tank (AST) for diesel, and a state-issued Air Permit. Mr. Burk stated they do generate hazardous wastes from the paint operations. Inspector Kline asked if the tank cars contained any hazardous wastes. Mr. Burk stated the tank cars come in with less than one inch of commodity, which would equate to roughly 55-gallons. Inspector Kline asked if tank cars come in with greater than an inch of commodity. Mr. Burk stated on occasion maybe one or two per month come in with excess. Inspector Kline requested a list of commodities that Union Tank Car Company receives. Mr. Burk provided a list and stated the AWA has approved these commodities to be neutralized and pH adjusted prior to being discharged to the Altoona Easterly STP (**See Attachment #14**).

Inspector Kline asked Mr. Burk to describe the operations at Union Tank Car Company. Mr. Burk stated the tank cars are brought into an area called the Cleaning Rack, where each car is sampled for BOD and COD and measured to ascertain how much commodity remained. Mr. Burk stated the BOD and COD sample bottles are provided by the AWA and analyzed by Pace Analytical. The car is assigned a traveler packet that describes what commodity is in the car and what maintenance or repair will be performed on the car while it is at the facility. The contents of the car are neutralized, and pH tested. The pH is adjusted using sodium hydroxide or soda ash. The car sits while neutralizing for approximately 30-minutes. According to Mr. Burk, the car is then tested with pH paper and verified within range prior to being drained, and the wastewater is sent to the Altoona Easterly STP. Inspector Kline asked if there was additional pretreatment for the wastewater prior to being sent to the Altoona Easterly STP. Mr. Burk stated there was no additional treatment. Inspector Kline asked if any of the cars contained hazardous wastes. Mr. Fontenot stated the contents were considered commodities and not wastes, and that they do not treat any hazardous wastes. Mr. Fontenot added the small amounts of commodity remaining would be considered and handled as RCRA empty.

Inspector Kline asked how many employees are at this Union Tank Car Company location. Mr. Burk stated there are approximately 130 full-time employees. Inspector Kline asked what Union Tank Car Company operating hours are. Mr. Burk stated there are three shifts for around the clock coverage during the week, and that they are closed on the weekends.

C. Union Tank Car Company- Observations

Inspector Kline requested to tour the Union Tank Car Company. Accompanying Inspector Kline on the tour were: Mr. Wyandt, Mr. Shubert, Mr. Ulery, and Mr. Burk.

Observation #1: The first area visited was the outdoor Cleaning Rack. Inspector Kline observed four tank cars in this area. Inspector Kline asked what was in the tank cars. Mr. Ulery pulled the traveler packets and stated they contained ammonium nitrate. Inspector Kline observed a centralized grate-covered drain (**See Attachment #1- Photo #11**). Mr. Ulery stated this drain connects to the Altoona Easterly STP. Inspector Kline observed through the grate openings what appeared to be an off-white emulsified solid debris (**See Attachment #1- Photo #12**). Inspector Kline asked if there screens to prevent such solid materials from entering the conduit to the STP. Mr. Ulery stated they did not have screening installed.

Observation #2: Inspector Kline toured the Valve and Fitting Building. Mr. Burk stated tank car valves are removed and replaced, interiors are coated, exteriors are painted and/or maintenance is performed. Once the work is completed, the tank cars are then sent back out to the lessor.

This concluded the physical inspection portion of Union Tank Car Company. Inspector Kline and Mr. Wyandt left the facility at approximately 2:40PM.

IV. Closing Conferences

After the inspections of Norfolk Southern Corporation and Union Tank Car Company, individual closing conferences were conducted and led by Inspector Kline at each respective facility following the physical inspection portions. Attending the closing conference for Norfolk Southern Corporation were Mr. Calhoun and Mr. Wyandt. Attending the closing conference for Union Tank Car Company were Mr. Shubert, Mr. Ulery, Mr. Burk, and Mr. Wyandt. Inspector Kline shared preliminary observations about each inspection individually at the respective facilities. Inspector Kline reiterated that all preliminary observations discussed were not compliance determinations. 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.

V. List of Attachments

Attachment 1. Photographs

Attachment 2. NPDES Permit- Altoona Easterly STP

Attachment 3. Intermunicipal Wastewater Treatment and Conveyance Service Agreement

Attachment 4. 2023 Annual Report

Attachment 5. IU Survey Form

Attachment 6. Wastewater Division Rates, Rules, and Regulation Governing the Service of Wastewater Policy

Attachment 7. IU Permit- Norfolk Southern Corporation

Attachment 8. IU Permit- Union Tank Car Company

Attachment 9. IU Inspection Report- Norfolk Southern Corporation

Attachment 10. IU Inspection Report- Union Tank Car Company

Attachment 11. Checklist

Attachment 12. Analytical test results (May 7, 2024- Norfolk Southern Corporation)

Attachment 13. LDEQ TEC Exclusion Letter (June 9, 2010)

Attachment 14. AWA/Union Tank Car Company Approved Commodities List