



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 JFK Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 05/25/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pre-Treatment - Industrial User Inspection
Site/Facility Name: M-B Companies, Inc.
Permittee(s): M-B Companies, Inc.
Site/Facility Operator: M-B Companies, Inc.
Site/Facility Address: 95 Blessing Road
Muncy, PA17756
Latitude: 41.196764 **Longitude:** -76.822242
County/Parish: Lycoming County
Permit Number: N/A
NAICS Code: 33391 **SIC:** 3563
Unique Project #: 3E22AWN030A

Site/Facility Representative(s): **Point of Contact**
Ben Thomke ☒
Phone: 570-599-6921 Email: Benjamin.thomke@aebi-schmidt.com
Director Business Unit

EPA Inspector:
Garth Connor
Phone: 215-814-3209 Email: Connor.garth@epa.gov
EPA Inspector

Report Preparer _____
Signature/Date Report preparer name/(& mail code if EPA Inspector) Date
Preparers' address

Supervisor _____
Signature/Date Enter Supervisor's Name and Mail Code Date

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I. Introduction

On May 25, 2022, Garth Connor, an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III Office in Philadelphia, Pennsylvania, conducted an onsite Pre-Treatment Inspection at the M-B Companies, Inc. facility (hereinafter, “M-B”, “the Facility”). This industrial plant is located at 95 Blessing Road in Muncy, Lycoming County, Pennsylvania. M-B is a manufacturer of airport runway and road painting equipment. The Facility discharges its wastewater to the nearby West Branch Wastewater Treatment plant which is located about 0.5 miles away next to the Susquehanna River. The purpose of the inspection was to observe compliance with the Pre-Treatment regulations of the Clean Water Act (CWA) and to verify their compliance with the applicable industrial user regulations. The Pennsylvania Department of Environmental Protection was invited to the inspection but chose not to attend.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at about 10:00 AM for this onsite inspection and met with the following facility representative:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspector			
Garth Connor		215-814-3209	Connor.garth@epa.gov
Site/Facility Representative			
Ben Thomke	M-B Companies, Inc – Director Business Unit	570-599-6921	Benjamin.thomke@aebi-schmidt.com

Garth Connor displayed his inspector credentials to Ben Thomke, the Director of the Facility’s Business Unit, at the start of the inspection, and explained that the purpose of the inspection was to observe their compliance with the pre-treatment regulations of the Clean Water Act. The EPA Inspector informed Mr. Thomke that any information that the Facility deemed to be Confidential Business Information (“CBI”) should be identified to the EPA inspector 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 mostly sunny with temperatures in the 70’s.

C. Summary of the Site/Facility

M-B is an equipment manufacturing plant located in the small town of Muncy, Lycoming County, Pennsylvania. The Facility functions as the Pavement Marking Division of a much

larger company, Aebi Schmidt Inc., which is headquartered in Zurich, Switzerland. The Facility makes painting equipment that is loaded on to large trucks, and their customers subsequently use the trucks to spray painted lines at airports and on roads. An empty flatbed truck is loaded with all the required painting equipment, such as air compressors and spraying equipment. The Facility does not actually fill the spraying equipment with any paint, that is done by their customers at another location, where the paint itself is added. This Facility does not ever add or remove paint at this plant. M-B is essentially providing its customers with a mobile painting truck that can be filled with paint for a variety of different outdoor applications. The Facility moved from another location in the adjacent town of Montgomery, Pennsylvania in 2017, where it had operated with the same manufacturing process for many years.

II. Site Activity

During the inspection, the EPA Inspector first discussed the details of the Facility's wastewater program with Ben Thomke in an Opening Conference. Mr. Thomke explained to the EPA inspector that this Facility currently has about 40 employees and operates from 6:00 AM to 4:30 PM daily. It is one division or segment of a much larger corporation with many different types of facilities. The Facility does batch discharge of its wastewater tank about two or three times a month, usually on Wednesdays, to the nearby West Branch Wastewater plant. The Facility's wastewater tank only has a total capacity of 300 gallons, so the Facility does not produce large quantities of its industrial wastewater on a daily or even a weekly basis. See **Attachment #1 - Inspection Photographs** for a view of the wastewater tank itself. The inspector walked through the entire plant to see where the different parts of the Facility's manufacturing process occurred. The inspection observations were made pursuant to the requirements of the Pre-Treatment regulations of the Clean Water Act.

III. Observations

The Facility operates a small manufacturing plant, and their production process begins with an empty flatbed truck (**Photograph #1**). Various pieces of painting equipment are loaded on to these trucks, and the different pieces of spray-painting equipment are then securely attached by M-B staff. The trucks are equipped to perform spray painting while the truck is moving at a slow rate of speed on a road or an airport runway (**Photograph #2**). The inspector was then shown the Facility's wastewater tank where the wastewater from the manufacturing process is collected prior to batch discharge to the nearby wastewater treatment plant (**Photograph #3 & #4**). A batch discharge occurs two or three times each month, and it's usually done by M-B staff on Wednesdays. The Facility only produces a small amount of process wastewater each day from its manufacturing process, about 50 gallons, so it takes a

significant number of working days to fill the wastewater tank. The EPA inspector was also shown the tank monitoring system and the exact sampling location at the Facility's wastewater tank (**Photograph #3**). The wastewater is constantly monitored for pH, and the bi-annual samples are collected in the very middle of this gray wastewater tank to make certain that it's a representative sample. The samples are collected when the tank is almost full, just prior to a batch discharge to the wastewater plant. Mr. Thomke explained to the EPA inspector that when the wastewater is sampled, it is then analyzed twice each year by Pace Analytical Labs in Williamsport, Pennsylvania. The wastewater parameters included in the sample analysis are lead, copper, zinc, nickel, zinc, cadmium, chromium, and cyanide. Total flow and pH are also recorded by the Facility's monitoring system on a constant basis.

IV. Records Review

During this inspection, the EPA Inspector filled out an Industrial User Inspection Checklist, and that document is attached (**Attachment #2 – Industrial User Inspection Checklist**). He was also given an electronic copy of all the discharge limits and sampling requirements for the Facility's wastewater (**Attachment #3 – Discharge Limits and Sampling Requirements**). The Facility does twice a year sampling of its wastewater and the laboratory analysis of the samples is done offsite by Pace Analytical Laboratories in Williamsport, Pennsylvania. The EPA inspector also received electronic copies of the Facility's most recent wastewater sampling event in December of 2021 (**Attachment #4 – Bi-Annual Sampling Analysis from December of 2021**). At the time of the inspection, the Facility had yet not done a sampling event in calendar year 2022, but one was scheduled for the month of June in 2022.

V. Closing Conference

After the facility discussion, the EPA Inspector met with the facility representative for a closing conference. The EPA Inspector shared preliminary observations with the facility. The EPA Inspector reiterated to the facility representative 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 its attachments that were not identified at the time of the closing conference after EPA reviewed additional materials that were sent following the onsite inspection.

The inspection concluded at approximately 1 PM, and the EPA inspector then left the Facility. The EPA inspector headed over to the nearby West Branch Wastewater Treatment plant, and had a brief discussion with Bob Kaiser, West Branch's Compliance Coordinator, about the wastewater program and the batch discharges from the nearby M-B plant. Mr. Kaiser explained to the inspector that he does periodically visit the Facility himself to observe their wastewater

sampling. The inspector did also drive by the old M-B plant in the adjacent town of Montgomery, Pennsylvania as he was leaving the area in his car.

VI. List of Attachments

Attachment #1: Inspection Photographs

Attachment #2: Industrial User's Checklist

Attachment #3: Discharge Limitations & Sampling Requirements

Attachment #4: Recent Bi-Annual Sampling Results & Analysis