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):	08/03/2021 to 8/4/2021
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Field Audit Inspection
Site/Facility Name:	Punxsutawney Wastewater Treatment Facility
Site/Facility Address:	342 Water Street Extension Punxsutawney, PA 15767
Latitude:	40.942196 **Longitude:** -79.001229
County/Parish:	Jefferson County
Permit Number:	PA0020346
NAICS Code:	221320
Unique Project #:	3E21RC037A

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

V. Charles Hess, Sewage Treatment Plant Supervisor ☒

Phone: 814 938-4396 Email: pxychas@verizon.net

Mary McHenry, Pretreatment Coordinator ☐

Phone: 814 938-4808

EPA Inspector:

Jim Kline
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Report Preparer Signature/Date

Jim Kline 9/29/2021
Jim Kline Date
1650 Arch Street Philadelphia, PA 19103 (3ED13)

Supervisor Signature/Date

JAMES BENNETT Digitally signed by JAMES BENNETT Date: 2021.09.29 21:14:03 -04'00'
James Bennett (3ED13) Date

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I. Introduction

On August 3rd and 4th, 2021, the United States Environmental Protection Agency, Region III ("EPA"), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an onsite Field Audit Inspection at the Punxsutawney Wastewater Treatment Facility (hereinafter, "the Facility"). The Facility is located at 342 Water Street Extension in Punxsutawney, Jefferson County, Pennsylvania **(See Attachment #1- Photo #1)**.
The purpose of the inspection was to observe compliance with the Pre-Treatment Regulations of the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The U.S. 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). Mr. Clint Stonesifer, Water Quality Specialist, PADEP was present for a portion of the inspection. Due to the ongoing pandemic, Inspector Kline provided the Facility with advance notification of the inspection.

A. Opening Conference

Inspector Kline arrived at the Punxsutawney Borough located at 301 East Mahoning Street, Suite 6 in Punxsutawney on Tuesday, August 3rd, 2021 and presented his credentials to Ms. Mary McHenry, Pretreatment Coordinator. Inspector Kline conducted an opening conference with Ms. McHenry. Inspector Kline explained the purpose and scope of the inspection to Ms. McHenry.

Inspector Kline requested 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 the EPA CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with highs in the upper seventies.

II. Facility Activity

Ms. McHenry stated that she handles the administrative portion of the Pretreatment Program and maintains all records regarding their one Industrial User (IU) at her office. Inspector Kline asked McHenry how the Punxsutawney Borough identifies possible unpermitted or new IUs. Ms. McHenry stated that the Borough is rather small with no new activity regarding anticipated growth. Ms. McHenry stated she would send out annual questionnaires to businesses or companies and certain locations based off sewer usage, construction permits, and observations made by code enforcement.

Ms. McHenry stated that they only had the one IU, Punxsutawney Finishing Works. Inspector Kline requested to review the Punxsutawney Finishing Works IU folder. Inspector Kline observed BFG Manufacturing Services (BFG) on several documents within the IU folder. Ms. McHenry stated BFG is the owner of Punxsutawney Finishing Works and they are both at the same location but are separate businesses. Inspector Kline requested a copy of the process flow diagram for the IU **(See Attachment #2)**. Inspector Kline asked Ms. McHenry who conducts the IU Inspections. Ms. McHenry stated the inspections are conducted semi-annually by Mr. Hess. Inspector Kline requested a copy of the most recent IU Inspection conducted on March 26, 2021 **(See Attachment #3)**. Inspector Kline asked Ms. McHenry if the IU had any ongoing issues or permit exceedances. Ms. McHenry stated the IU has had issues with zinc exceedances and is required to sample for zinc three times monthly. Ms. McHenry stated the IU had a zinc exceedance issue that occurred in 2018 and appeared to be corrected in March 2019. Ms. McHenry added there was an occurrence in January 2020 that according to Mr. Casey Lellock, Engineer, BFG Manufacturing Services was a sampling error on the part of the IU **(See Attachment #4)**.

Inspector Kline completed portions of the Field Audit Checklist that were applicable to Ms. McHenry's oversight **(See Attachment #5)**. Inspector Kline made arrangements to meet with Mr. Hess and to conduct the IU visit of Punxsutawney Finishing Works later that afternoon.

Inspector Kline asked Ms. McHenry if their annual report was current. Ms. McHenry stated the annual reporting was due March 31st, 2021. Ms. McHenry had sent their annual report on March 12th, 2021.

Inspector Kline traveled to the Wastewater Treatment Facility. Inspector Kline met Mr. Hess. Mr. Clint Stonesifer, Water Quality Specialist, PADEP was in Mr. Hess's office during this initial meeting. Inspector Kline asked both Mr. Hess and Mr. Stonesifer if there were any known issues, problems or permit exceedances at the Facility. Both Mr. Hess and Mr. Stonesifer stated operations were running well. Both Mr. Hess and Mr. Stonesifer stated the NPDES Permit for the Wastewater Treatment Facility has been waiting renewal since 2013. Inspector Kline requested to review Discharge Monitoring Reports (DMRs) for the Facility.

Inspector Kline asked Mr. Hess to contact the Punxsutawney Finishing Works and inform them that both Inspector Kline and Mr. Hess would be arriving at their location to complete the IU portion of the Field Audit. Mr. Stonesifer excused himself and did not attend.

III. Observations (IU)

Inspector Kline and Mr. Hess met at the Punxsutawney Finishing Works located at 701 Martha Street in Punxsutawney **(See Attachment #1- Photo #2)**. Mr. Casey Lellock, Engineer, Punxsutawney Finishing Works greeted both Inspector Kline and Mr. Hess. Inspector Kline presented his credentials to Mr. Lellock and conducted an opening conference with Mr. Lellock, Mr. Hess, and Mr. Mike Grube, President. Inspector Kline explained the purpose and scope of the inspection to Mr. Grube and Mr. Lellock.

Inspector Kline requested 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 the EPA CBI procedures. Mr. Grube stated that from what Inspector Kline would be observing and possibly photographing, there wouldn't be CBI.

Mr. Lellock briefly described operations at the Punxsutawney Finishing Works. According to Mr. Lellock, primary operations include zinc plating and some wet painting of parts. Mr. Lellock stated that no manufacturing occurs on location. Mr. Grube added that they currently have one hundred-thirty (130) full-time employees with operations twenty-four hours a day, six days a week.

Inspector Kline asked Mr. Lellock if Punxsutawney Finishing Works was able to meet the conditions of their IU Permit issued by the Facility. Mr. Lellock stated they had made some changes and upgrades to their Pretreatment Program due to zinc exceedances in the past. Both Mr. Hess and Mr. Lellock stated their current sampling and analytical results are in compliance with their permit. Mr. Lellock stated their last exceedance was a sampling error that occurred in-house back in January of 2020. According to Mr. Lellock, samples are collected and delivered by himself to a third-party lab for analysis.

Inspector Kline was escorted on a tour of the Punxsutawney Finishing Works. Mr. Lellock stated the flooring near plating and rinse tanks was coated and acted as containment for spills or splash from the dip tanks. Inspector Kline observed an area near the bath dip tanks where the concrete floor was exposed, and the coating was either removed or no longer existed **(See Attachment #1- Photo #3)**. Inspector Kline had observed what appeared to be a spill in the same general area of the exposed floor. Inspector Kline made the comment to both Mr. Lellock and Mr. Hess that the general housekeeping near the dip tanks on the floor appeared to be lacking and could be improved. Mr. Lellock stated the floor coating would be repaired and would improve the overall housekeeping. Inspector Kline added that housekeeping is covered in the Field Audit Checklist. Mr. Hess stated that housekeeping was something generally considered but was not officially listed in his IU Inspection Checklist.

Inspector Kline was escorted to the five hundred (500) gallon Pretreatment Sampling Tank **(See Attachment #1- Photo #4)**. According to Mr. Lellock this tank is where all samples are collected. Mr. Hess stated that he collects samples outside the Facility. Inspector Kline was escorted to the outfall where Mr. Hess collects samples **(See Attachment #1- Photos #5 & #6)**. Mr. Hess stated this location has easier access and is less disruptive to the IU. According to Mr. Lellock, the outfall is directly down gradient from the pretreatment sampling tank with no other connecting lines or other outside influence.

Inspector Kline conducted a brief closing conference with Mr. Lellock, Mr. Hess and Mr. Grube. This concluded the inspection for the day.

IV. Observations (POTW)

Inspector Kline returned to the Facility on Wednesday August 4th, 2021. Mr. Hess escorted Inspector Kline on a tour of the Facility. Mr. Hess took Inspector Kline to the areas that are currently leased to Dan-Pun **(See Attachment #1- Photos #7, #8, #9 & #10)**. Mr. Hess stated all buildings and tanks are or have been emptied. According to Mr. Hess, the IU permit that was issued to Dan-Pun is no longer valid and all Dan-Pun operations at the Facility have ceased.

Mr. Hess continued the tour with Inspector Kline. The tour ended at the permitted outfall on Mahoning Creek. Inspector Kline observed the outfall and the receiving stream. Within the stream, there appeared to be a definitive layer where the outfall meets the stream **(See Attachment #1- Photo #11)**. Mr. Hess stated that the Facility was considering options where the outfall could be piped directly into the receiving stream.

V. Closing Conference

Prior to conducting a closing conference with Mr. Hess, Inspector Kline completed the IU checklist with Mr. Hess's input. Inspector Kline conducted a closing conference. Inspector Kline shared preliminary observations about the Facility and the IU. Inspector Kline reiterated with Mr. Hess that all the preliminary observations discussed were not compliance determinations. 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 the attachments that were not identified at the time of the closing conference.

VI. Follow-up Communications

Inspector Kline received an e-mail from Mr. Casey Lellock on August 17, 2021. In the e-mail, Mr. Lellock attached two photos of actions taken as a result of the inspection, namely the repair of the floor coating **(See Attachment #1- Photos #12 & #13)**.

VII. List of Attachments

Attachment 1: Photos

Attachment 2: IU Flow Diagram

Attachment 3: IU Inspection (March 26, 2021)

Attachment 4: IU Sampling Event (Jan. 2020)

Attachment 5: POTW Field Audit Checklist