



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

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 08/25/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment – Industrial User Inspection
Facility Name: Pennex Aluminum
Permittee(s): Pennex Aluminum
Facility Operator: Pennex Aluminum
Facility Address: 50 Community Street, Wellsville, PA 17365
Lat/Long: 40.0524, -76.93907
County/Parish: York
Permit Number: PAP132000
NAICS & SIC Codes: 423510/5051
Unique Project #: 3E22WN033A

Facility Representative(s): Nathan Foor – Training Coordinator – Pennex Aluminum
Point of Contact ☒
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EPA Inspectors: Aaron Thomson - EPA Inspector (3ED33)
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I. Introduction

On August 15, 2022, Aaron Thomson (hereinafter, “Inspector Thomson”, or the “EPA Inspector”) an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III conducted an on-site inspection of the Pennex Aluminum facility’s (hereinafter, “Pennex”, or “the facility”) pretreatment program. The facility is an aluminum extrusion plant, which receives raw aluminum, melts it, casts it into logs and then extrudes it, creating a finished product. The facility is located at 50 Community Street, Wellsville, PA 17365. 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 Pennsylvania Department of Environmental Protection (“PADEP”) was invited to the inspection but chose not to attend. No controlling document or permit was provided by the Facility as of writing this report.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at approximately 11:00 AM for the on-site inspection. Inspector Thomson met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA - Philadelphia	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Nathan Foor	Pennex Aluminum	717-432-9647	NFoor@pennexaluminum.com
Gary Yeager	Pennex Aluminum	717-432-9647	None provided

Inspector Thomson displayed their credentials to Mr. Gary Yeager (hereinafter “Mr. Yeager”), Maintenance Manager at Pennex and Mr. Nathan Foor (hereinafter “Mr. Foor”), the Training Coordinator at Pennex, at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspector informed Mr. Yeager 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.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny with a high of 90 degrees Fahrenheit.

II. Facility Activity/Walkthrough

The Pennex Aluminum facility is an aluminum casting and extrusion manufacturing plant. The facility receives raw aluminum scrap which are melted and cast into cylinders of aluminum which are then extruded. The facility’s manufacturing processes that contribute to the wastewater stream discharged to the POTW conveyance system includes backwash water generated from the water-cooling system process used on metal during the extrusion process, blowdown from non-contact cooling water, and sanitary wastewater. According to Mr. Yeager, the wastewater (backwash) generated during the extrusion process is collected in an equalization storage tank where it is monitored for pH, Oxygen-Reduction Potential (ORP) and conductivity. Backwash both leaving and entering the EQ tank is filtered to remove physical media. When the conductivity of the water in the EQ exceeds desirable process limits, the pH of the wastewater is measured with a probe to ensure it is still within permitted discharge limits, if necessary the pH is adjusted with neutralization, and then moved to a reservoir tank to be discharged to the POTW conveyance system. Mr. Yeager stated the probe is calibrated

monthly by “Guardian;” Inspector Thomson requested information or documentation detailing the calibration services’ name and location which has not been supplied by the Facility as of writing this report. Mr. Yeager stated that the water is discharged in batches, automatically, approximately once per day shift. According to Mr. Yeager, the facility calibrates pH, ORP and conductivity daily, and Guardian (no location/further information given) calibrates their systems monthly. Mr. Yeager stated that the monitoring system runs 24/7 and will notify their phones via email if any issues occur.

Inspector Thomson requested information or documents relating to the categorical industrial user status of the facility, as of writing this report and as of writing this report, the requested documents have not been provided by the Facility. A Categorical Industrial User (CIU) is subject to the Federal Pretreatment Regulations 40 CFR Part 403. Categorical Industrial User Regulations 40 CFR Part 433.15 details the pretreatment standards of an existing aluminium forming point source, extrusion subcategory. The facility discharges to the Wellsville publicly owned treatment works (POTW). Because the facility discharges into a POTW without an approved pretreatment program, EPA is designated as the Control Authority per 40 CFR Part 403.3(f), and as such is the authority for inspections under section 308 of the CWA.

After the opening conference, Mr. Yeager led a tour of the processes that contribute to the wastewater discharge to the sewage system. Inspector Thomson was led to the facility’s monitoring probe console (**Attachment 1 Photographs 1 and 2**). Next, Inspector Thomson was led to the filtration system, a tank with granular activated carbon (GAC) filter media, (**Attachment 1 Photographs 3 and 4**), which was adjacent to the equalization tank (**Attachment 1 Photograph 5**). From the equalization tank, Inspector Thomson was led to the “bail water” tank (**Attachment 1 Photographs 6 and 7**). The piping exiting the “bail water” tank (reservoir tank holding post-treatment wastewater) included the Facility’s sampling point (**Attachment 1 Photograph 8**) and leads the wastewater to the Facility’s discharge point to the POTW. Inspector Thomson was then led to the facility’s sampling station, where expired buffers were observed (**Attachment 1 Photographs 9, 10 and 11**). Finally, Inspector Thomson was led to the point where the wastewater stream from the Facility’s wastewater pretreatment system joins with the rest of the Facility’s discharged wastewater (**Attachment 1 Photograph 12**) including a flow meter and shutoff valve. This concluded the site tour.

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 Inspector Aaron Thomson, and are provided in **Attachment 1**. Not all photographs taken during the inspection are included in this report.

Visual Observations pertaining to each section are listed at the end of each section.

Section 1.				
General Information				
	Yes	No	N/A	Comments
General Description of Processes and Products	aluminum casting/extrusion			
Are there any alternates to effluent monitoring conducted? (e.g., TTO/TOMP, Waiver requirements?) Describe in comments if “yes”	☐	☐	☐	No info provided

Provide production rates for all processes subject to production based standards and include:	No info provided			
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				
Shift information, list	4 shifts/day runs 24/7, discharges approximately once per day shift			
1) Shift #				
2) No. of Employees				
3) Hours				
4) Work Days				
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?	☒	☐	☐	No info from facility provided
Category(s):	40 CFR Part 433.15,			
Subcategory(s):	Subpart A: Metal Finishing.			
Regulatory New Source Date:				
New source?	☐	☒	☐	
List of categorical processes	Backwash (cast/extrude doesn't produce wastewater that is discharged)			
List of other operations producing wastewater	Rinse/wash			
List all visual observations pertaining to this section	Information or documentation regarding categorical status was requested by Inspector Thomson at the time of the inspection and as of writing this report the Facility has supplied no further documents or information			

Section 3.				
Characterization of Wastewater Discharges (CFR 433.15)				
	Yes	No	N/A	Comments
Describe the time of day discharge to sewer occurs	Batch Discharge, once per day shift			
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

Section 4.

Pretreatment Facility

	Yes	No	N/A	Comments
Pretreatment installed?	☒	☐	☐	Consists of filtering physical media, measuring/neutralizing pH
Briefly describe treatment processes and operation.	Water is filtered through granular activated carbon. Filtered water is measured for pH, conductivity and ORP and, if necessary, neutralized to bring pH with permitted parameters before being discharged to the POTW			
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	monitoring to verify that no further treatment is necessary			

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)?	☐	☐	☐	Not Provided
Is sampling location (identified on block flow diagram) the same as in control mechanism? If no, explain.	☐	☐	☐	Not Provided
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?	☐	☐	☐	Not Provided

Are any parameters monitored by approved methods more frequently than required at permitted sampling location?.	☐	☐	☐	Not Provided
If yes to previous question, are all results submitted to the control authority?	☐	☐	☐	Not Provided
Does facility resample and report within 30 days of discovering a violation?	☐	☐	☐	Not Provided
Are sampling records maintained on site? Describe for how long.	☐	☐	☐	Not Provided
Is flow determined as required by permit?	☐	☐	☐	Not Provided
How is flow determined (i.e., estimated or measured)?	Measured continuously (meter)			
Is flow measurement appropriate?	☒	☐	☐	
Is flow measurement device calibrated?	☒	☐	☐	Guardian (no info available) 1/month
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?	☐	☒	☐	Expired buffers
Is other monitoring equipment (e.g. DO meter) calibrated? Describe how often if yes.	☒	☐	☐	Monthly by Guardian (no info available)/daily calibration by facility
Is sampling and analysis done in-house or by contract? If by contract, list company.	☐	☐	☐	Not Provided
Is QA/QC program for sampling and analysis adequate? Obtain copy of plan if available.	☐	☐	☐	Not Provided
List all visual observations pertaining to this section	Buffers observed were expired			

Section 6.				
Hazardous Waste Management				
	Yes	No	N/A	Comments
Is IU aware of RCRA regulations?	☒	☐	☐	
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.	☐	☐	☐	Inspector Thomson asked for description of process to remove/haul physical media generated from filtration, no info provided
Has facility notified POTW and EPA of any hazardous waste discharges to the sewer?	☐	☒	☐	
List all visual observations pertaining to this section				

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.	☐	☒	☐	Facility not aware of any spill/slug
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?	☐	☐	☐	Not Provided
If yes to previous question, was it determined that they needed one?	☐	☐	☐	Not Provided
Does the IU have a spill prevention (SP) plan to address spills to the POTW?	☐	☐	☐	Not Provided
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.	☐	☒	☐	
List all visual observations pertaining to this section				

Section 8.				
Recordkeeping Review.				
	Yes	No	N/A	Comments
Current IU control mechanism (through EPA, not a permit)	Not Provided			
Notices and correspondence with control authority including:				
a. Self monitoring report transmittals?	☐	☐	☐	Not Provided
b. BMR if required?	☐	☐	☐	Not Provided
c. Other?	☐	☐	☐	Not Provided
Do sampling records include:				
a. Date of sampling event?	☐	☐	☐	Not Provided
b. Time of sampling event?	☐	☐	☐	Not Provided
c. Name of sampling person and affiliation?	☐	☐	☐	Not Provided
d. Sample collection method?	☐	☐	☐	Not Provided
e. Method of sample preservation?	☐	☐	☐	Not Provided
f. Description of sample location?	☐	☐	☐	Not Provided
g. Name of person conducting analysis?	☐	☐	☐	Not Provided
h. Date of analysis?	☐	☐	☐	Not Provided
i. Time of analysis, if applicable (i.e., BOD, Cr?)	☐	☐	☐	Not Provided
j. Sample analysis method?	☐	☐	☐	Not Provided
Is type of sample specified in control mechanism?	☐	☐	☐	Not Provided

Are all parameters monitored at the required frequency? Note any discrepancies in comments.	☐	☐	☐	Not Provided
Analytical results?	☐	☐	☐	Not Provided
Are all monitoring results sent to the Control Authority?	☐	☐	☐	Not Provided
Are copies sent to the POTW?	☐	☐	☐	Not Provided
Appropriate production records for production based standards?	☐	☐	☐	Not Provided
Documentation of flow rates and volumes?	☐	☐	☐	Not Provided
Are records maintained at least 3 years?	☐	☐	☐	Not Provided
List all visual observations pertaining to this section				

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				

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	According to Mr. Yeager, no stormwater permit is necessary on site			
Does facility have a stormwater pollution prevention plan?	☐	☐	☒	
Describe any BMPs that the facility is currently implementing.				
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)	☐	☐	☒	Not Provided
b. monitoring (indicate in comments the date range reviewed)	☐	☐	☐	Not Provided
c. recordkeeping/reporting (indicate in comments the date range and records reviewed)	☐	☒	☐	Not Provided
List all visual observations pertaining to this section				

IV. Records Review

As part of the inspection, prior to the inspection via teleconference and during the inspection, Inspector Thomson requested the following documentation be sent via email up to two weeks after the inspection: Control mechanism, 2 years worth of monitoring reports with chain of custody and sample results and slug/spill control plans (**Attachment 1, Photograph 13**). Additionally, during the inspection, Inspector Thomson asked for information relating to the categorical status, the removal and haulage of waste generated from the filtration system as well as process flow diagrams relating to the pretreatment. No information or documentation was provided by the facility as of writing this report.

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

Attachment 1. Photo Log

Attachment 2. Detailed Facility Report _ ECHO _ US EPA