



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): 08/27/2020
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: NPDES – CWA – Pretreatment Audit
Site/Facility Name: Hatfield Township STP
Permittee(s): Hatfield Township Municipal Authority
Site/Facility Address: 3200 Advance Lane
Colmar, PA 18915
Latitude: 40.278507 **Longitude:** -75.255135
County/Parish: Montgomery
Permit Number: PA0026247
NAICS Code: 221320 **SIC:** 4952
Unique Project #: 3E21WN043A

Site/Facility Representative(s): **Point of Contact**
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EPA Contractors:
N/A

State/Local Inspectors:
N/A

Report Preparer	Aaron Thomson (3ED13)	Date
Signature/Date	1650 Arch Street Philadelphia, PA 19103	

Supervisor	James Bennett (3ED13)	Date
Signature/Date		

Unique Project#: 3E21WN043A

Table of Contents

<u>Section</u>		<u>Page</u>
I	Introduction.....	3
A	Inspection Opening Conference.....	3
B	Weather and Precipitation Conditions.....	3
C	Summary of the Facility.....	3
II	Site Activity.....	4
III	Observations.....	5
IV	Records Review.....	6
V	Closing Conference.....	6
VI	List of Attachments.....	7

I. Introduction

On August 27, 2021, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a NPDES CWA Pretreatment Audit of the Hatfield Township STP facility (hereinafter, “the facility”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) Permit No. PA0026247 (hereinafter, the “Permit”) and applicable State and Federal regulations (**Attachment 3**).

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 10:30 AM for the inspection. The inspector met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA Inspector 1 Title/Affiliation	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Joe Stammers	HTMA	215-822-9300	jstammers@htmasewer.com

Inspector Thomson displayed their credentials to Mr. Stammers at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the Permit is provided in Appendix A. The EPA Inspection Team informed Mr. Stammers 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, weather was sunny with a high of 90 degrees Fahrenheit.

C. Summary of the Site/Facility

According to Mr. Stammers, the Hatfield Township Municipal Authority is an advanced activated sludge facility, incorporating screenings removal, grit and grease removal, primary clarification, biological and chemical treatment, secondary clarification and ultra-violet disinfection of its effluent. HTMA services Hatfield Township and Hatfield Borough, along with portions of Montgomery Township, Franconia Township, and Hilltown Township. According to the permit, a hydraulic design capacity of 10.68 million gallons per day for the treatment facility is used to determine whether a “hydraulic overload” situation exists, however, the effluent limitations for Outfall 001, the discharge point for the facility’s treatment plant, are determined

using an effluent discharge rate of 6.96 MGD, according to Mr. Stammers. The facility discharged to a tributary of the Neshaminy Creek.

II. Site Activity

Inspector Thomson asked Mr. Stammers to describe the treatment process. Mr. Stammers provided inspector Thomson with a process flow diagram, created in 2017. Mr. Stammers stated that it accurately depicts the current process, which was later verified by the inspector during the site visit (**Attachment 10**). Mr. Stammers stated that the facility accepts both hauled septage and hauled sludge at the facility. The facility had a tertiary plant that stopped operating in the 1980's, however they use the tankage from that plant to accept and "pretreat" and assess the hauled septage before allowing it to enter the "main" wastestream. Hauled sludge joins the facility's sludge stream before entering the centrifuge where it is dewatered and then incinerated. The resulting ash is hauled and landfilled by either GROWS Landfill or Tullytown Landfill, out of Morrisville, PA. Inspector Thomson asked Mr. Stammers to describe the sampling process. Mr. Stammers stated Facility employees receive on the job training for sampling/analysis, with samples for all parameters, excluding metals, handled on site daily and/or according to permitted frequency. Metal samples are analyzed by Eurofins Lancaster Laboratory, Inc., and the samples are collected by facility employees using bottles prepared by Eurofins. The Inspector reviewed chain of custody documentation during the record review to verify this.

According to Mr. Stammers, the facility currently has four permitted significant industrial users (SIU) and three non-significant categorical industrial users. The SIU include A.L. Finishing Company, Inc.; Lucerne Dairy Plant; Penn Color, Inc.; Brooks Instrument; and Clean Earth, Inc. The NSCIU include Precision Fluidics Division of Parker Hannifin; Laboratory Testing, Inc.; and Cobham Advanced Electronic Solutions. Mr. Stammers provided the related permits/documentation for these sites which have been attached to this report (**Attachments 4-9**).

Inspector Thomson asked Mr. Stammers to describe the sampling events at the IUs. Mr. Stammers stated that HTMA conducts a compliance evaluation/sampling event for each SIU at minimum quarterly for local/categorical limits. These samples, collected by HTMA (using bottles prepared by the respective labs), are analyzed either at HTMA's labs, or sent to either Eurofins or Test America, Inc. out of Fort Washington for analysis. NSCIU's submit certification annually, the most recent certifications were reviewed by the Inspector (**Attachment 9**).

HTMA samples Clean Earth, a hazardous waste processing site, whenever the site discharges to the facility – typically one to three times per week. Mr. Stammers stated that although Clean Earth is permitted to discharge up to 100,000 gallons per day, their mass loading permitted limits are based on a 35,000 discharge, which is the typical discharge amount. The wastewater stream that is discharged to the facility is first treated and monitored by Clean Earth, and is not discharged to the facility unless measured permitted parameters are met. Clean Earth accepts bulk liquids from established clients who have an established profile with Clean Earth, detailing

the expected pollutants, in addition to the sampling of loads that are hauled in. Clean Earth also conducts its own sampling/monitoring daily, and provides the resulting DMRs to the facility on a monthly basis. Quarterly local limit/categorical limit sampling is still conducted at Clean Earth on a quarterly basis to be tested by a designated “outside” lab, as outlined in the permit.

During the inspection, the EPA Inspection Team observed: the facility’s treatment plant and Clean Earth’s pretreatment plant. The inspection observations were made pursuant to the requirements of the Permit. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Aaron Thomson, and are provided in Attachment# 1, however not all photographs taken during the inspection are included in this report.

III. Observations

After the opening conference, Mr. Stammers led Inspector Thomson on a tour of the facility’s treatment plant. First, the facility’s lab was visited and Inspector Thomson reviewed calibration and buffer logs (**Photographs 1-3**). Inspector Thomson was then led to the aeration chambers, final clarifier, then to the primary clarifiers, leading to the equalization diversion chamber/screw pump station (**Photograph 4**) that houses influent sampling station (**Photograph 5**). Mr. Stammers described how a grab sample and how a composite sample would be taken at this point. Inspector Thomson observed both a sampling/calibration log and a thermometer within the composite sampler’s refrigerator reading 3 degrees Celsius (**Photographs 6, 7**). Mr. Stammers then led Inspector Thomson through the treatment process to the ultraviolet disinfectant chamber, where the effluent sample point is located (**Photograph 8**). Mr. Stammers described how a sampling event would occur at this point. Inspector Thomson observed two composite samplers; Mr. Stammers stated that two composite samplers are in use at this point in case one fails, the other will still be operational. The first composite sampler’s refrigerator read -1.6 degrees Celsius and the second read 3.6 degrees Celsius (**Photographs 9, 10**). Sampling and calibration logs were present at the effluent sampling point (**Photograph 11**). Mr. Stammers then led Inspector Thomson to the facility control room (**Photograph 12**). This concluded the tour of the facility.

After the tour of the facility, Inspector Thomson and Mr. Stammers met at Clean Earth, Inc. for a tour of the IU’s pretreatment process. After arriving at the IU, they were met by Crystal Patel and David Scheule, the Laboratory Manager and Materials Manager for Clean Earth, respectively. Inspector Thomson explained the reason for the visit and asked Mrs. Patel to describe the pretreatment process at the IU. Mrs. Patel stated that after approving and profiling the accepted wastestream, the stream enters the primary reactor tank with continuous monitoring. After achieving desired parameters, the stream enters a secondary reactor tank which is also monitored. After this treatment process, the stream enters an equalization tank to be held until the appropriate capacity is reached, the tank is sampled and if the results are acceptable, after

coordinating with HTMA the tank is discharged to the facility. This discharge is typically 30,000-32,000 gallons and lasts for four hours; during the first hour a composite sample is performed and grab samples are taken. Inspector Thomson was then led on a tour of the IU's pretreatment process and lab by Mrs. Patel, ending at the effluent sampling point. This point is located in a shed with two composite samplers, one controlled by the IU and one controlled by HTMA, and HTMA has access to this shed at all times (**Photographs 13, 15, 17**). Both Mrs. Patel and Mr. Stammers described how they would perform a sampling event at this location (**Photograph 16**). Sampling and calibration logs were present at the sampling point and were reviewed by the Inspector for accuracy. Inspector Thomson observed a thermometer in HTMA's composite sampler refrigerator reading approximately 3 degrees Celsius (**Photograph 14**). Finally, Inspector Thomson was led to the effluent flow meter. This concluded the tour of the IU.

IV. Records Review

Inspector Thomson requested to review analytical reports and documents including weekly sampling events and DMRs from the past 3 years. Inspector Thomson verified that the samples were representative of typical operating conditions did not observe any exceedances. Documents sent via email from Mr. Stammers to Inspector Thomson are attached to this report and are listed in the attachments below.

Inspector Thomson completed the Pretreatment Checklist with input from Mr. Stammers (**Attachment #2**).

V. Closing Conference

After the facility walk, 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 2:00 PM.

VI. List of Attachments

- Attachment 1: Photo Log
- Attachment 2: Hatfield Pretreatment Checklist
- Attachment 3: Hatfield NPDES Permit
- Attachment 4: Clean Earth Permit
- Attachment 5: A.L. Finishing Permit
- Attachment 6: Lucerne Dairy Permit
- Attachment 7: Penn Color, Inc. Permit
- Attachment 8: Brooks Instrument Permit
- Attachment 9: NSCIU Certs
- Attachment 10: HTMA Flow Diagram