



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): August 21-22, 2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Facility Name: Bradford Sewage Treatment Plant (STP)
Permittee(s): Bradford Sanitary Authority
Site/Facility Operator: Bradford Sanitary Authority
Facility Address: 410 Seaward Avenue Bradford, PA 16701
Lat/Long: 41.98468, -78.62869
County/Parish: Bradford
Permit Number: PA0026379
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN074A

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I. Introduction

On August 21-22, 2023, Inspector Jim Kline (Inspector Kline) from the U.S. Environmental Protection Agency (EPA) Region 3, National Pollutant Discharge Elimination System (NPDES) Section conducted an on-site Pretreatment Compliance Inspection (PCI) of the Bradford Sanitary Authority (hereinafter “BSA”) Pretreatment Program. The Bradford Sewage Disposal Treatment Plant, or Sewage Treatment Plant (“STP”), is located at 410 Seaward Avenue Bradford, PA 16701 (hereinafter, the “Facility”) (**See Attachment #1- Photo #1**). The purpose of the inspection was to observe the BSA Pretreatment Program’s compliance with the Clean Water Act (CWA), the applicable Federal Pretreatment Regulations, and the Facility’s National Pollutant Discharge Elimination System (NPDES) permit (Permit No. PA0026379) (**See Attachment #2**). Prior to the PCI, the Pennsylvania Department of Environmental Protection (“PADEP”) was notified of the inspection. The PADEP did not send a representative to attend the PCI. Inspector Kline did provide BSA advanced notice of the PCI.

All information included in this report is the result of observations made by Inspector Kline, statements made by BSA, W. R. Case & Sons Cutlery, and/or Allegheny Surface Technology representatives, materials shown to Inspector Kline by BSA, W. R. Case & Sons Cutlery, and/or Allegheny Surface Technology representatives, and/or documents provided by BSA, W. R. Case & Sons Cutlery, and/or Allegheny Surface Technology representatives to Inspector Kline at the time of, or subsequent to, the inspection.

A. BSA - Opening Conference

Inspector Kline arrived at the Bradford Sewage Disposal Plant at 12:30PM on Monday August 21, 2023. Upon arrival, Inspector Kline presented his credentials to Mr. Donnie Hayden, Operations Manager. Mr. Hayden introduced Inspector Kline to Mr. Matthew Dennis, Plant Operator and Pretreatment Coordinator. Mr. Hayden also introduced Inspector Kline to Mr. Eric Buzza and Ms. Vittoria LaRosa, Consultants from Gannett Fleming. Inspector Kline proceeded to conduct an Opening Conference with Mr. Hayden, Mr. Dennis, Mr. Buzza and Ms. LaRosa.

Inspector Kline informed Mr. Hayden and Mr. Dennis that any information that BSA 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. Hayden and Mr. Dennis that photographs would be taken during the inspection (photographs are provided in Attachment #1 of this report).

B. BSA - Background Information

The Bradford Sewage Disposal Plant is a wastewater treatment plant owned and operated by BSA. According to the PADEP-issued NPDES Permit, the Bradford Sewage Disposal Plant has a hydraulic capacity of 25 million gallons per day with an actual flow of 4.62 million gallons per day. The NPDES Permit was effective on June 1, 2018, and was set to expire on May 31, 2023, but has been administratively extended by PADEP since that time.

According to Mr. Hayden, BSA services Bradford Township, Lewis Run Borough, Lafayette Township, Foster Township, and BSA and has a jurisdictional agreement with each. Inspector Kline requested and received a copy of the Interjurisdictional Agreement (**See Attachment #3**). The agreement was made and entered into on August 28, 2003. Inspector Kline asked if BSA had a Sewer Use Ordinance. Mr. Hayden stated yes, they do and provided Inspector Kline with a copy of a document titled, “Rules, and Regulations Governing Wastewater Service and the Discharge of Sewage, Industrial Waste and Other Wastes into the Public Sewer System” (**See Attachment #4**).

Inspector Kline asked when the last time BSA evaluated their local limits for the Pretreatment Program. Mr. Hayden stated the local limits were approved earlier this year. Inspector Kline asked if BSA was current with all EPA annual reporting requirements. Mr. Hayden stated BSA is current and has not been late with annual reporting. The most recent Annual Report that BSA submitted was in 2022 (**See Attachment #5**).

Inspector Kline asked if BSA accepts any hauled in wastes. Mr. Hayden stated BSA has one permitted hauler, J&J Honey Dipping that provides local septic removal services that transports to their facility. Mr. Hayden denied accepting any Oil and Gas Production and/or Oil and Gas Exploration Wastes.

Inspector Kline asked Mr. Hayden if BSA had a Fats Oil and Grease (FOG) Program. Mr. Hayden stated the city code enforcement provides oversight for FOG and that FOG is not handled by BSA.

C. BSA – Industrial Pretreatment Program File Review

Inspector Kline conducted an Industrial Pretreatment Program File Review at BSA. According to Mr. Hayden and Mr. Dennis, BSA has nine permitted industrial users (IUs). Inspector Kline requested and received a listing of IUs and their addresses (**See Attachment #6**). According to Mr. Dennis, four of the IUs are categorical industrial users (CIUs).

Inspector Kline asked how BSA identifies potential industrial users. Mr. Hayden stated the permitting process is started through the city. BSA has developed a survey questionnaire for potential industrial users (**See Attachment #7**). Mr. Hayden stated that once a survey was completed, an inspection of that facility would be conducted.

Inspector Kline asked if IU inspections and/or sampling are conducted by BSA. Mr. Dennis stated he conducts inspections at each IU annually, and he also conducts sampling at each IU annually. Inspector Kline asked Mr. Dennis if he documents the inspections and sampling events. Mr. Dennis stated he does write inspections reports but doesn’t document the sampling events as the sampling events do generate an analytical report. Mr. Dennis stated the sampling events are announced and that sampling consists of both grab and composite samples collected by himself. Mr. Dennis added that composite samples are collected using BSA’s composite sampler. Mr. Dennis stated their contracted third-party lab, Pace Analytical in DuBois, PA., transports the samples, conducts analysis, and provides BSA with an analytical report.

Inspector Kline asked if any of the IUs had any permit parameter exceedances in the past three years. Mr. Hayden stated the IUs have been doing well with only a few exceedances. Mr. Hayden provided Inspector Kline with annual Industrial Pretreatment Program Lab Analysis spreadsheets which indicates exceedances from 2023 to 2020 (**See Attachment #8**). The exceedances and BSA actions taken during this period were:

IU	Parameter Exceedance	Date	Actions taken
Allegheny Surface Technology	Molybdenum	4/6/2023	Resampled (returned to compliance)
Microtech Knife	Copper	1/25/2023	Resampled (returned to compliance)
Bradford Forest Products LLC	Molybdenum	8/2/2022	Resampled (returned to compliance)
Allegheny Bradford Corp-219	Nickel	1/5/2021	Resampled (returned to compliance)
Allegheny Bradford Corp-219	Chromium	1/5/2021	Resampled (returned to compliance)
Allegheny Bradford Corp-219	Chromium	1/7/2020	Resampled (returned to compliance)
Allegheny Bradford Corp-219	Chromium	2/5/2020	Resampled (returned to compliance)
Danzer North America, INC.	Molybdenum	8/14/2020	Resampled (returned to compliance)

Inspector Kline asked if BSA had developed an Enforcement Response Plan (ERP) or similar type document to address incidents that occurred in their Pretreatment Program. Mr. Hayden stated they do have an ERP. Inspector Kline was provided with a copy of the ERP (**See Attachment #9**). Inspector Kline completed the Field Audit Checklist with input from Mr. Hayden, Mr. Dennis, and Mr. Buzza (**See Attachment #10**).

Inspector Kline requested and received a copy of the IU Permit issued to W. R. Case & Sons Cutlery located at 50 Owens Way in Bradford (**See Attachment #11**). Inspector Kline also requested and received a copy of the inspection report conducted by Mr. Dennis on August 3, 2023, for W. R. Case & Sons Cutlery (**See Attachment #12**).

Inspector Kline requested and received a copy of the IU Permit issued to Allegheny Surface Technology located at 14 Egbert Lane in Lewis Run (**See Attachment #13**). Inspector Kline requested and received a copy of the inspection report conducted by Mr. Dennis on July 24, 2023 (**See Attachment #14**).

As part of the PCI, Inspector Kline selected both W. R. Case & Sons Cutlery and Allegheny Surface Technology for the IU tour portions of the inspection. Inspector Kline decided that the W. R. Case & Sons Cutlery would be inspected the morning of August 22, 2023, and Allegheny Surface Technology would be inspected in the afternoon of August 22, 2023.

II. IU Inspection- W. R. Case & Sons Cutlery

A. W. R. Case & Sons Cutlery- Opening Conference

Inspector Kline returned to the Bradford Sewage Disposal Plant on Tuesday August 22, 2023, at 8:15AM. Inspector Kline, Mr. Hayden, Mr. Dennis, Mr. Buzza and Ms. LaRosa then traveled to W. R. Case & Sons Cutlery located at 50 Owens Way in Bradford at approximately 8:30 (**See Attachment #1- Photo #2**). Inspector Kline presented his credentials to Ms. Penny Hunt, EHS Supervisor, and Mr. Claude Mays, Environmental Service Manager. Mr. Mays stated that he also works at Zippo Manufacturing, which has a NPDES direct discharge permit and is not part of the BSA Pretreatment Program. Inspector Kline was introduced to Mr. Brian Piscitelli, Director of Manufacturing, and Mr. Rich Brandon, Asset and Facility Engineer Manager. Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed Ms. Hunt, Mr. Mays, Mr. Piscitelli, and Mr. Brandon that any information 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, there was not any CBI claims made. 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 BSA 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. W. R. Case & Sons Cutlery - Background Information

Inspector Kline asked Ms. Hunt, Mr. Mays, Mr. Piscitelli, and Mr. Brandon to briefly describe some of the background of W. R. Case & Sons Cutlery (hereinafter, “Case”). Mr. Mays stated Case dates back to 1889, originating in New York and relocating to Bradford in 1905. Mr. Mays stated Case was acquired by Zippo Manufacturing in 1993. Mr. Mays stated Case is located on an approximately twenty-acre parcel with operations in one 60,000 square foot building. Mr. Mays added a 3,000 square foot addition was added two years ago for additional manufacturing. Inspector Kline asked if the addition changed any process or effluent flow to the BSA. Mr. Mays stated there was no change.

According to Mr. Mays, there are approximately 360 employees at W. R. Case & Sons Cutlery with 250 of those employees conducting direct manufacturing. Inspector Kline asked what the plant operating hours are. Mr. Piscitelli stated they operate almost twenty-four hours a day, Monday through Thursday. Inspector Kline asked if there was a generic process flow diagram that brief described the operations within the plant. Mr. Mays provided Inspector Kline with a copy of the wastewater flow chart (**See Attachment #15**). Mr. Piscitelli stated metal coils are brought into the facility and cut primarily by press. Mr. Piscitelli stated they no longer do heat treating at this facility. Mr. Piscitelli stated the knife handles are made from a variety of bone or synthetics, some of the handles are also dyed. The knives are assembled, finished, and tested. Mr. Piscitelli added photo embellishment operations was stopped last year.

Inspector Kline asked who conducts the sampling and analytical analysis of generated process wastewater. Mr. Mays stated sample collection is contracted out to Fairway Laboratories, which was acquired by Pace Analytical. Mr. Mays stated analytical results normally are received within two to three weeks. Mr. Mays stated the results are then sent to BSA.

C. W. R. Case & Sons Cutlery - Observations

Inspector Kline requested to tour the plant. The tour was led by: Ms. Hunt, Mr. Mays, Mr. Piscitelli, and Mr. Brandon.

Observation #1: The first areas visited were Receiving and Press Areas. According to Mr. Piscitelli operations in the Press Area are from 6:00AM until 2:00 PM. Both areas appeared to be neat and orderly.

Observation #2: Inspector Kline visited the Bone Dye Area. Inspector Kline observed a portion of this area was blocked from entry by an extended yellow and black caution strap. There were several absorbent pads placed on the floor in this area, along with open-topped metal containers (**See Attachment #1- Photo #3**). Inspector Kline did not observe containment devices being used instead of the absorbent pads. During the inspection of this area, Inspector Kline did not observe anyone actively clean or remove the pads from the floor.

Observation #3: Inspector Kline toured the Profile, Surface Grinding, Assembly, Hafting and Finishing Areas. Inspector Kline observed that these areas appeared neat and orderly.

Observation #4: Inspector Kline toured the Clean Line Area. Inspector Kline asked what chemicals were used in this unit. Mr. Mays stated an in-line Lewis Nearfield Ultrasonic Cleaning System is used for knives coming from the final buffing process. Mr. Mays provided Inspector Kline with a brochure about the cleaning system unit (**See Attachment #16**). According to Mr. Mays, the process uses municipal water and a cleaning product, Resolve 230. Mr. Mays provided Inspector Kline with the Safety Data Sheet for Resolve 230 (**See Attachment #17**). According to Mr. Mays, the cleaning system has three chambers: steam pre-clean, wash tank, and rinse. When needed, the wash tank is emptied by pumping it to their underground storage tank, which is then shipped out for treatment as a residual waste. The rinse water is discharged to the BSA.

Observation #5: Inspector Kline visited the permitted sampling location, which is an outdoor manhole located along the sidewalk to the entrance of the facility (**See Attachment #1- Photo #4**). W. R. Case & Sons Cutlery employees removed the manhole cover to facilitate observation (**See Attachment #1- Photo #5**).

This concluded the physical inspection portion of W. R. Case & Sons Cutlery. Inspector Kline left the facility at approximately 12:50PM.

III. IU Inspection- Allegheny Surface Technology

A. Allegheny Surface Technology- Opening Conference

Inspector Kline, Mr. Hayden, Mr. Dennis, Mr. Buzza and Ms. LaRosa arrived at Allegheny Surface Technology located at 14 Egbert Lane in Lewis Run on August 22, 2023, at approximately 12:45PM (**See Attachment #1- Photo #6**). Inspector Kline presented his credentials to Mr. John Smith, Environmental Coordinator, at the

outset of the inspection. Inspector Kline conducted an Opening Conference. During the Opening Conference, Inspector Kline informed Mr. Smith 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. Smith did not identify any 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 BSA 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. Allegheny Surface Technology– Background Information

Inspector Kline asked Mr. Smith to provide a brief historical description of their facility and what Allegheny Surface Technology does at this location. According to Mr. Smith, Allegheny Surface Technology is a metal surface finishing company primarily for pharmaceutical, chemical, food and beverage, electronic, architectural, and automotive industries. Mr. Smith stated they mechanically or electropolish metal and only remove metal from the surface of the item. Mr. Smith stated they do not add any metal to the surface. Mr. Smith stated Allegheny Surface Technology started at this location in 1993. In 2012, a fire severely damaged the building.

Inspector Kline asked, in addition to the IU Permit issued by BSA, whether Allegheny Surface Technology has other permits or generates hazardous wastes. Mr. Smith stated they are a Large Quantity Generator of Hazardous Waste and has a Permit-by-Rule for their wastewater treatment unit filed with the PADEP (**See Attachment #18**). Mr. Smith added that they do have an NPDES General Permit for industrial stormwater discharges issued by the PA DEP.

Inspector Kline asked Mr. Smith how many employees are at Allegheny Surface Technology. Mr. Smith stated there are 23 full-time employees who cover two shifts and one part-time employee for the office. Mr. Smith stated they experience slower business months typically in February and August, which are customer driven.

Inspector Kline asked Mr. Smith to describe the process and wastewater treatment system at Allegheny Surface Technology. Mr. Smith provided Inspector Kline with a process flow diagram (**See Attachment #19**). Mr. Smith stated their pretreatment system consists basically of three steps. First, the treatment tanks are used to treat generated rinse waters that are batch treated with coagulant (magnesium hydroxide and lime) to increase the pH to 5. Mr. Smith added anionic polymers are sometimes added. Mr. Smith stated the second step involves dewatering the sludge. The filter press was removed approximately two years ago and was replaced by a rotational drum vacuum filter which is currently used. Mr. Smith stated the removed sludge is non-hazardous and disposed of in a landfill. Mr. Smith stated finally, the wastewater pH is decreased to less than 9.0.

Inspector Kline asked who conducts the sample collection and analytical analysis of the samples. Mr. Smith stated he collects the samples and CWM Environmental does the analytical testing. Mr. Smith stated in approximately two weeks he receives the analytical report and sends the report to BSA.

Inspector Kline asked Mr. Smith if Allegheny Surface Technology had any permit parameter exceedances within the past three years. Mr. Smith stated they did have a molybdenum exceedance in April 2023. Mr. Smith stated they conduct bench tests for molybdenum so they will not exceed their permit.

C. Allegheny Surface Technology- Observations

Inspector Kline requested to tour Allegheny Surface Technology. Mr. Smith led the tour.

Observation #1: Inspector Kline observed the Rinse Water Tote Storage Area (**See Attachment #1- Photo #7**). Inspector Kline observed fourteen 330-gallon totes in this area. Inspector Kline observed that the totes were marked as hazardous waste (**See Attachment #1- Photos #8 & #9**).

Observation #2: Inspector Kline observed the pretreatment unit (**See Attachment #1- Photo #10**) and the rotational drum vacuum filter (**See Attachment #1- Photo #11**).

Observation #3: Inspector Kline observed a white super sac (**See Attachment #1- Photo #12**). Inspector Kline observed the contents of the super sac to be mostly an off-white solid substance and appeared to be nearly one-third full (**See Attachment #1- Photo #13**). Mr. Smith stated that the contents were non-hazardous residual waste that came from the drum filter.

Observation #4: Inspector Kline observed the effluent sample location, which appeared to be a tap valve off the mainline. According to Mr. Smith, the mainline runs from Tanks #1, #2 and #3 to the BSA (**See Attachment #1- Photo #14**).

This concluded the physical inspection portion of Allegheny Surface Technology. Inspector Kline left the facility at approximately 4:20PM.

IV. Closing Conferences

After the inspections of W. R. Case & Sons Cutlery and Allegheny Surface Technology, Inspector Kline conducted individual closing conferences at each facility. Inspector Kline shared preliminary observations about each facility. 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.

Inspector Kline conducted a closing conference with Mr. Hayden, Mr. Dennis, Mr. Buzza and Ms. LaRosa following the BSA Pretreatment Compliance Inspection. This concluded the PCI.

V. List of Attachments

Attachment 1. Photographs

Attachment 2. NPDES Permit

Attachment 3. Interjurisdictional Agreement

Attachment 4. Sewer Use Ordinance Annual Report

Attachment 5. Annual Report

Attachment 6. IU Listing

- Attachment 7.** Questionnaire LCAPP-IU Permit
- Attachment 8.** Exceedances LCAPP- Map
- Attachment 9.** ERP
- Attachment 10.** Checklist
- Attachment 11.** IU Permit- Case
- Attachment 12.** Case- Inspection Report
- Attachment 13.** IU Permit- AST
- Attachment 14.** AST- Inspection Report
- Attachment 15.** Case- Wastewater Flow Chart
- Attachment 16.** AST- Cleaning System (Brochure)
- Attachment 17.** AST- SDS Resolve 230
- Attachment 18.** AST- PDR PADEP
- Attachment 19.** AST- Process Flow Diagram