



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: H.P.S.D., LLC Sewage Plant
Facility Address: 602 4-H Camp Road, Morgantown, WV 26508
Mailing Address: 466 Christy Street, Suite 2, Morgantown, WV 26505

Report Prepared on: 10/12/2023 By: _____,
Date Environmental Scientist (PG Environmental)
Signature

Report Final as of: _____ By: _____, EPA
Date *Signature*

General Information

Type of Inspection:	Wastewater Treatment Facility CEI
Owner:	H.P.S.D., LLC
Operator:	P&B Services, LLC
Permittee:	H.P.S.D., LLC
NPDES Permit No:	WV0105970
NPDES Permit Effective Date:	November 1, 2018
NPDES Permit Expiration Date:	September 18, 2023
Receiving Water and/or MS4:	Booths Creek to the Monongahela River
Latitude and Longitude:	39.57148, -79.974893

On-Site Facility Inspection Overview

On August 10, 2023, U.S. Environmental Protection Agency (EPA) Region III's contract inspector from PG Environmental, (hereinafter referred to as Inspector) inspected the H.P.S.D., LLC Sewage Plant (hereinafter, Facility or Plant) in Morgantown, West Virginia. H.P.S.D., LLC is identified as the Permittee and owns the Plant. P&B Services, LLC is the contracted company that operates the Plant. The Inspector was accompanied on the inspection by the Plant's Lead Operator and a state representative from the West Virginia Department of Environmental Protection (WVDEP).

Approximate Entry Time: 8:30 AM (EDT) **Approximate Exit Time:** 11:30 AM (EDT)

Unique Project Identifier (UPI): 3E23WN116A

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Appendix A: Photograph Log

Appendix B: Exhibit Log

- Exhibit 1 – EPA ECHO Exceedance Data (August 2018 through July 2023)
- Exhibit 2 – EPA ECHO Detailed Facility Report

Appendix C: NPDES Permit No. WV0105970

I. INTRODUCTION

On August 10, 2023, U.S. Environmental Protection Agency (EPA) Region III's contract inspector from PG Environmental, (hereinafter referred to as Inspector) inspected the H.P.S.D., LLC Sewage Plant (hereinafter, Facility or Plant) in Morgantown, West Virginia. H.P.S.D., LLC is identified as the Permittee and owns the Plant. P&B Services, LLC is the contracted company that operates the Plant. The Inspector was accompanied on the inspection by the Plant's Lead Operator and a state representative from the West Virginia Department of Environmental Protection (WVDEP). The Permittee's activities are regulated under National Pollutant Discharge Elimination System (NPDES) Permit No. WV0105970 (hereinafter, Permit), which became effective on November 1, 2018 (refer to Appendix C). The Permit was originally set to expire on September 18, 2023; however, a new permit was issued on July 11, 2023, with a new effective date of September 1, 2023 (i.e., after the inspection). The inspection occurring on August 10, 2023, evaluated compliance with the requirements of the 2018 Permit.

The primary purpose of the inspection was to review the onsite Plant operations, the accuracy and reliability of the Permittee's self-monitoring and reporting program, and to obtain information that will assist EPA in assessing the Permittee's compliance with the requirements of the Permit. Periods of moderate to heavy precipitation were experienced during the inspection.

The Plant has two sequence batch reactors (SBRs), which handle the bulk of flows to the Plant. According to the Lead Operator, the Plant typically receives approximately 40,000 to 45,000 gallons per day (GPD) of flow, and the SBRs combined can handle about 50,000 GPD. The Plant is designed for 100,000 GPD. High influent volumes that are not able to be treated by the SBRs are directed to the Plant's Biologically Engineered Single Sludge Treatment (BESST[™]) system, which provides extended aeration and clarification. The Lead Operator stated that the BESST[™] system is utilized routinely under daily peak flow conditions.

A contract operator is onsite at the Facility for a few hours four to five days a week. The Facility has access to portable generators in case of a power failure.

II. INSPECTION PROCESS

Inspection Opening Conference

The Inspector arrived at the Plant at 8:30 AM (EDT) for the inspection. Jake Albright of PG Environmental presented his Clean Water Act inspector credential to the Lead Operator at the outset of the inspection and explained the purpose of the inspection was to observe compliance with the Permit. A copy of the Permit is provided in Appendix C. Table 1 describes the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Contract Inspector			
Jake Albright, Inspector	PG Environmental	(703) 956-1957	jake.albright@pgenv.com
State Representative			
Allen Carpenter, Environmental Inspector	West Virginia Department of Environmental Protection	(304) 368-3960	allen.l.carpenter@wv.gov
Site/Facility Representative			
Patrick Lesmann, Lead Operator	P & B Services, LLC	(304) 641-0002	pandbservicecellc@gmail.com

Facility Site Walk

As part of the inspection process, the Inspector visually observed the treatment train and site conditions in the presence of the Lead Operator (refer to [Appendix A, Photographs 1 through 14](#)). The Inspector also visually inspected the outfall, located outside the Facility's northern fence line, as well as the receiving stream (Booths Creek). The wastewater treatment train consists of:

- Influent flow box with manual bar screen
- Influent Equalization Basin
- Two SBRs (operated in parallel)
- Dual-train BESST™ system (extended aeration and clarification)
- Effluent Equalization Basin
- Ultraviolet (UV) light disinfection
- Backup tablet system for chlorine disinfection and dechlorination
- Anaerobic Digester/Sludge Holding Tank

The Plant serves roughly 320 homes with approximately 1,000 residents in a subdivision outside of downtown Morgantown, WV. There are two lift stations in the subdivision's collection system that elevate the wastewater, which is then gravity-fed to the Plant.

Wastewater enters the influent flow box at the headworks, which is equipped with a manually raked screen box. The Facility is equipped with two screen boxes so one can be removed and cleaned while the other is in service (refer to [Appendix A, Photographs 1 and 2](#)). After screening, the flow enters the Influent Equalization Basin before being pumped to the SBRs (refer to [Appendix A, Photograph 3](#)). The Influent Equalization Basin has a pump float that is set to pump higher volumes of influent to the BESST™ system, as the Influent Equalization Basin fills.

The SBRs go through a 4.5-hour cycle consisting of fill, fill/react, react, settle, and decant/waste (refer to [Appendix A, Photographs 4 and 5](#)). Additionally, the waste activated sludge pumps send solids to the digester for 1 minute at the end of every cycle.

The BESST™ system has two parallel trains consisting of aeration, clarification, and an anoxic zone (refer to [Appendix A, Photographs 6 and 7](#)). The Lead Operator stated that solids are pumped from the BESST™ system to the digester for 2 to 5 minutes, once or twice per week.

Flows leaving both the SBRs and the BESST™ system are directed to the Effluent Equalization Basin and then to a single-bank UV system for disinfection (in operation at the time of the inspection; refer to [Appendix A, Photograph 8](#)). Effluent flow is measured following UV disinfection, via ultrasonic transducer (refer to [Appendix A, Photograph 9](#)). The Facility also frequently utilizes tablets for chlorine disinfection and dechlorination, in addition to and downstream of the UV system (in operation at the time of the inspection; refer to [Appendix A, Photograph 10](#)). Following disinfection, effluent flows via gravity to Outlet No. 001 and is discharged to Booths Creek (refer to [Appendix A, Photographs 11 and 12](#)).

As stated previously, solids from the SBRs and BESST™ system are wasted to the anaerobic digester (refer to [Appendix A, Photograph 13](#)). Digested solids are pumped out periodically and sent to the Morgantown Utility Board wastewater treatment plant for further processing.

A Plant flow diagram is included in [Appendix A, Photograph 14](#).

Records Review

The Inspector conducted a records review to evaluate the Permittee's compliance with the Permit. Not all of the records and reports required by the Permit were available for review onsite (see Observation 2 in the *Summary of Observations* below). Plant equipment operation and maintenance (O&M) manuals were available and reviewed onsite. The following were reviewed:

- Electronic Discharge Monitoring Report (eDMR) data during the period from August 1, 2018 through July 31, 2023
- Contract laboratory chain of custodies and analytical reports (May through July 2023)
- Daily handwritten operational datasheets (February 2023 through date of inspection)
- Operations logbook (June 2023 through date of inspection)
- SBR and BESST[™] equipment O&M manuals

Summary of Observations

The following section summarizes the Inspector's observations relative to the Permit requirements, including the status of certain treatment units, O&M practices, the Permittee's monitoring and reporting documentation, and the Permittee's compliance with enforcement actions.

Permit Status and Effluent Exceedances

Section A.001 of the Permit defines effluent limitations and monitoring requirements for Outlet No. 001 discharges.

As part of the data review, the Inspector reviewed the Effluent Exceedances Report in EPA's Enforcement and Compliance History Online (ECHO) Database to compare reported values against effluent limitations defined in the Permit (refer to [Appendix B, Exhibit 1](#)).

Observation 1. According to EPA's ECHO database, the Plant experienced 109 effluent limit exceedances from Outlet No. 001 between August 1, 2018 and July 31, 2023 (refer to [Appendix B, Exhibit 1](#) and Table 2 below). The highest number of exceedances occurred for ammonia nitrogen (77 exceedances).

EPA's ECHO database indicates the Plant was in a state of significant noncompliance (SNC) from April 1, 2020 through June 30, 2022 (refer to [Appendix B, Exhibit 2](#)).

Table 2. Outlet No. 001 Final Effluent Exceedances (August 1, 2018 through July 31, 2023)

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105970	10/31/2018	Zinc, total recoverable	0.0772	0.064	mg/L	MO AVG
WV0105970	12/31/2018	Solids, total suspended	888.1	25	lbs/d	MO AVG
WV0105970	2/28/2019	Nitrogen, ammonia total (as N)	15.5	4	mg/L	MO AVG
WV0105970	2/28/2019	Nitrogen, ammonia total (as N)	15.5	8	mg/L	DAILY MX
WV0105970	2/28/2019	Nitrogen, ammonia total (as N)	13.0	6.7	lbs/d	DAILY MX
WV0105970	2/28/2019	Nitrogen, ammonia total (as N)	13.0	3.3	lbs/d	MO AVG
WV0105970	10/31/2019	Solids, suspended percent removal	82	85	%	MO AV MN

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105970	11/30/2019	Flow, in conduit or thru treatment plant	43566*	0.1	MGD	DAILY MX
WV0105970	11/30/2019	Solids, suspended percent removal	81	85	%	MO AV MN
WV0105970	2/29/2020	Nitrogen, ammonia total (as N)	3.8	3.3	lbs/d	MO AVG
WV0105970	2/29/2020	Nitrogen, ammonia total (as N)	10.7	4	mg/L	MO AVG
WV0105970	2/29/2020	Nitrogen, ammonia total (as N)	10.7	8	mg/L	DAILY MX
WV0105970	3/31/2020	BOD, 5-day, 20 deg. C	32	20	mg/L	MO AVG
WV0105970	4/30/2020	BOD, 5-day, 20 deg. C	71.2	40	mg/L	DAILY MX
WV0105970	4/30/2020	BOD, 5-day, 20 deg. C	26.7	16.7	lbs/d	MO AVG
WV0105970	4/30/2020	BOD, 5-day, 20 deg. C	71.2	20	mg/L	MO AVG
WV0105970	4/30/2020	Solids, total suspended	39	30	mg/L	MO AVG
WV0105970	4/30/2020	Nitrogen, ammonia total (as N)	12.2	4	mg/L	MO AVG
WV0105970	4/30/2020	Nitrogen, ammonia total (as N)	4.6	3.3	lbs/d	MO AVG
WV0105970	4/30/2020	Nitrogen, ammonia total (as N)	12.2	8	mg/L	DAILY MX
WV0105970	4/30/2020	Coliform, fecal general	1274	400	#/100mL	DAILY MX
WV0105970	4/30/2020	BOD, 5-day, percent removal	79	85	%	MO AV MN
WV0105970	4/30/2020	Solids, suspended percent removal	80	85	%	MO AV MN
WV0105970	5/31/2020	BOD, 5-day, 20 deg. C	15.3	10	mg/L	MO AVG
WV0105970	5/31/2020	Nitrogen, ammonia total (as N)	9.4	3.3	lbs/d	DAILY MX
WV0105970	5/31/2020	Nitrogen, ammonia total (as N)	16.5	4	mg/L	DAILY MX
WV0105970	5/31/2020	Nitrogen, ammonia total (as N)	16.5	2	mg/L	MO AVG
WV0105970	5/31/2020	Nitrogen, ammonia total (as N)	5.4	1.7	lbs/d	MO AVG
WV0105970	6/30/2020	Nitrogen, ammonia total (as N)	6	2	mg/L	MO AVG
WV0105970	6/30/2020	Nitrogen, ammonia total (as N)	6	4	mg/L	DAILY MX
WV0105970	7/31/2020	Nitrogen, ammonia total (as N)	4.9	4	mg/L	DAILY MX
WV0105970	7/31/2020	Nitrogen, ammonia total (as N)	4.9	2	mg/L	MO AVG
WV0105970	8/31/2020	Oxygen, dissolved (DO)	5.64	6	mg/L	INST MIN
WV0105970	8/31/2020	BOD, 5-day, 20 deg. C	13.6	10	mg/L	MO AVG
WV0105970	8/31/2020	BOD, 5-day, 20 deg. C	13.8	8.3	lbs/d	MO AVG
WV0105970	8/31/2020	Solids, total suspended	36.1	25	lbs/d	MO AVG
WV0105970	8/31/2020	Solids, total suspended	35.5	30	mg/L	MO AVG
WV0105970	8/31/2020	Coliform, fecal general	3448	200	#/100mL	MO GEOMN
WV0105970	8/31/2020	Coliform, fecal general	3448	400	#/100mL	DAILY MX
WV0105970	9/30/2020	Nitrogen, ammonia total (as N)	10.4	3.3	lbs/d	DAILY MX
WV0105970	9/30/2020	Nitrogen, ammonia total (as N)	9.1	1.7	lbs/d	MO AVG

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105970	9/30/2020	Nitrogen, ammonia total (as N)	34.1	4	mg/L	DAILY MX
WV0105970	9/30/2020	Nitrogen, ammonia total (as N)	34.1	2	mg/L	MO AVG
WV0105970	10/31/2020	BOD, 5-day, 20 deg. C	11.8	10	mg/L	MO AVG
WV0105970	10/31/2020	Nitrogen, ammonia total (as N)	6.3	2	mg/L	MO AVG
WV0105970	10/31/2020	Nitrogen, ammonia total (as N)	2.3	1.7	lbs/d	MO AVG
WV0105970	10/31/2020	Nitrogen, ammonia total (as N)	6.3	4	mg/L	DAILY MX
WV0105970	11/30/2020	Nitrogen, ammonia total (as N)	6.3	4	mg/L	MO AVG
WV0105970	12/31/2020	Nitrogen, ammonia total (as N)	10.7	3.3	lbs/d	MO AVG
WV0105970	12/31/2020	Nitrogen, ammonia total (as N)	10.7	6.7	lbs/d	DAILY MX
WV0105970	12/31/2020	Nitrogen, ammonia total (as N)	27.5	4	mg/L	MO AVG
WV0105970	12/31/2020	Nitrogen, ammonia total (as N)	27.5	8	mg/L	DAILY MX
WV0105970	1/31/2021	Nitrogen, ammonia total (as N)	12.5	6.7	lbs/d	DAILY MX
WV0105970	1/31/2021	Nitrogen, ammonia total (as N)	25.1	4	mg/L	MO AVG
WV0105970	1/31/2021	Nitrogen, ammonia total (as N)	25.1	8	mg/L	DAILY MX
WV0105970	1/31/2021	Nitrogen, ammonia total (as N)	8.1	3.3	lbs/d	MO AVG
WV0105970	2/28/2021	Nitrogen, ammonia total (as N)	15.9	6.7	lbs/d	DAILY MX
WV0105970	2/28/2021	Nitrogen, ammonia total (as N)	12.1	3.3	lbs/d	MO AVG
WV0105970	2/28/2021	Nitrogen, ammonia total (as N)	31.9	4	mg/L	MO AVG
WV0105970	2/28/2021	Nitrogen, ammonia total (as N)	31.9	8	mg/L	DAILY MX
WV0105970	3/31/2021	Nitrogen, ammonia total (as N)	39.2	4	mg/L	MO AVG
WV0105970	3/31/2021	Nitrogen, ammonia total (as N)	13.2	3.3	lbs/d	MO AVG
WV0105970	3/31/2021	Nitrogen, ammonia total (as N)	24.0	6.7	lbs/d	DAILY MX
WV0105970	3/31/2021	Nitrogen, ammonia total (as N)	39.2	8	mg/L	DAILY MX
WV0105970	4/30/2021	Nitrogen, ammonia total (as N)	32.4	8	mg/L	DAILY MX
WV0105970	4/30/2021	Nitrogen, ammonia total (as N)	13.8	3.3	lbs/d	MO AVG
WV0105970	4/30/2021	Nitrogen, ammonia total (as N)	13.8	6.7	lbs/d	DAILY MX
WV0105970	4/30/2021	Nitrogen, ammonia total (as N)	32.4	4	mg/L	MO AVG
WV0105970	5/31/2021	BOD, 5-day, 20 deg. C	11.3	10	mg/L	MO AVG

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105970	5/31/2021	Nitrogen, ammonia total (as N)	24.5	4	mg/L	DAILY MX
WV0105970	5/31/2021	Nitrogen, ammonia total (as N)	9.9	1.7	lbs/d	MO AVG
WV0105970	5/31/2021	Nitrogen, ammonia total (as N)	24.5	2	mg/L	MO AVG
WV0105970	5/31/2021	Nitrogen, ammonia total (as N)	9.9	3.3	lbs/d	DAILY MX
WV0105970	6/30/2021	Nitrogen, ammonia total (as N)	23.8	2	mg/L	MO AVG
WV0105970	6/30/2021	Nitrogen, ammonia total (as N)	23.8	4	mg/L	DAILY MX
WV0105970	6/30/2021	Nitrogen, ammonia total (as N)	6.8	1.7	lbs/d	MO AVG
WV0105970	6/30/2021	Nitrogen, ammonia total (as N)	6.8	3.3	lbs/d	DAILY MX
WV0105970	7/31/2021	Nitrogen, ammonia total (as N)	12.6	1.7	lbs/d	MO AVG
WV0105970	7/31/2021	Nitrogen, ammonia total (as N)	48.6	2	mg/L	MO AVG
WV0105970	7/31/2021	Nitrogen, ammonia total (as N)	48.6	4	mg/L	DAILY MX
WV0105970	7/31/2021	Nitrogen, ammonia total (as N)	12.6	3.3	lbs/d	DAILY MX
WV0105970	8/31/2021	BOD, 5-day, 20 deg. C	9.6	8.3	lbs/d	MO AVG
WV0105970	8/31/2021	Nitrogen, ammonia total (as N)	3.9	2	mg/L	MO AVG
WV0105970	8/31/2021	Nitrogen, ammonia total (as N)	8.5	3.3	lbs/d	DAILY MX
WV0105970	8/31/2021	Nitrogen, ammonia total (as N)	8.5	1.7	lbs/d	MO AVG
WV0105970	9/30/2021	Nitrogen, ammonia total (as N)	7.3	2	mg/L	MO AVG
WV0105970	9/30/2021	Nitrogen, ammonia total (as N)	7.3	4	mg/L	DAILY MX
WV0105970	10/31/2021	BOD, 5-day, 20 deg. C	17.4	10	mg/L	MO AVG
WV0105970	10/31/2021	Nitrogen, ammonia total (as N)	15.1	1.7	lbs/d	MO AVG
WV0105970	10/31/2021	Nitrogen, ammonia total (as N)	15.1	3.3	lbs/d	DAILY MX
WV0105970	10/31/2021	Nitrogen, ammonia total (as N)	2.7	2	mg/L	MO AVG
WV0105970	11/30/2021	Nitrogen, ammonia total (as N)	19.0	3.3	lbs/d	MO AVG
WV0105970	11/30/2021	Nitrogen, ammonia total (as N)	19.0	6.7	lbs/d	DAILY MX
WV0105970	1/31/2022	Nitrogen, ammonia total (as N)	53.6	4	mg/L	MO AVG
WV0105970	1/31/2022	Nitrogen, ammonia total (as N)	53.6	8	mg/L	DAILY MX
WV0105970	1/31/2022	Nitrogen, ammonia total (as N)	16.9	3.3	lbs/d	MO AVG
WV0105970	1/31/2022	Nitrogen, ammonia total (as N)	16.9	6.7	lbs/d	DAILY MX

Permit #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0105970	2/28/2022	Nitrogen, ammonia total (as N)	4.2	4	mg/L	MO AVG
WV0105970	3/31/2022	Nitrogen, ammonia total (as N)	7.8	4	mg/L	MO AVG
WV0105970	4/30/2022	Nitrogen, ammonia total (as N)	4.8	4	mg/L	MO AVG
WV0105970	6/30/2022	Nitrogen, ammonia total (as N)	3	2	mg/L	MO AVG
WV0105970	7/31/2022	Nitrogen, ammonia total (as N)	2.1	2	mg/L	MO AVG
WV0105970	9/30/2022	Oxygen, dissolved (DO)	5.7	6	mg/L	INST MIN
WV0105970	10/31/2022	BOD, 5-day, 20 deg. C	11.2	10	mg/L	MO AVG
WV0105970	11/30/2022	BOD, 5-day, 20 deg. C	25.3	20	mg/L	MO AVG
WV0105970	11/30/2022	BOD, 5-day, percent removal	84.29	85	%	MO AV MN
WV0105970	2/28/2023	Solids, total suspended	39	30	mg/L	MO AVG
WV0105970	2/28/2023	Solids, suspended percent removal	83.33	85	%	MO AV MN
WV0105970	3/31/2023	Solids, suspended percent removal	78.45	85	%	MO AV MN

*This appears to be a data entry error, as the reported value equates to more than 43 billion gallons of flow. The actual value is unclear.

Records Retention

Section D.7 of the Permit states, “The permittee shall maintain all records and reports of all monitoring required by Section D of this permit for five (5) years after the date of monitoring or reporting. Records should include copies of all required reports; and records of all data used to complete these reports.”

Observation 2. Compliance monitoring data, contract laboratory chains of custody, and contract laboratory reports covering the period of time prior to P&B Services taking over as contract operator (i.e., prior to February 2023) were not available. At the time of the inspection, the Lead Operator explained that the majority of this information was likely retained by the Facility’s contract laboratory (Pace). Following the inspection, on August 24, 2023, the Lead Operator sent an email stating that he had been added to the Pace system for accessing historical records. No additional records were requested or provided after the inspection.

Proper Operation and Maintenance (O&M)

Part II of Appendix A of the Permit states, “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. Unless otherwise required by Federal or State law, this provision requires the operation of back-up auxiliary facilities or similar systems which are installed by the permittee only when the operation is necessary to achieve compliance with the conditions of the permit.”

Observation 3. The Lead Operator stated that prior to P&B Services being hired, some of the treatment components in the Plant were not being operated properly, leading to many of the recurring exceedances shown in Table 2. Specifically, he stated that many of the dynamic operational set points within the Plant were likely left static for long periods of

time under the previous operator. This included processes related to air distribution and solids management.

The Lead Operator stated that since P&B took over in February/March 2023, they have performed regular O&M activities such as draining and cleaning tanks and taking a more active approach to managing air delivery in the Plant.

Observation 4. Plant operators were not documenting pH meter calibration. The Lead Operator stated that operators perform a three-point calibration prior to conducting compliance analyses for pH; however, calibration time and results were not recorded.

Part III.3 of Appendix A of the Permit states, “Samples shall be taken, preserved and analyzed in accordance with the latest edition of 40 CFR Part 136, unless other test procedures have been specified elsewhere in this permit.”

Observation 5. Plant operators were not documenting sample and analysis times for pH, dissolved oxygen, and chlorine analyses to show that they were conducted within a 15-minute holding time.

Closing Conference

After the Plant site walk, the Inspector met with the Lead Operator for a closing conference and shared preliminary observations. The Inspector reiterated to the Lead Operator that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the Inspector and 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 the additional review of materials following the inspection.

The inspection concluded at approximately 11:30 AM (EDT).