



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 JFK Blvd.
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 11/09/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Domestic Wastewater
Site/Facility Name: Julia Ribauda Extended Care Center
Permittee(s): Saber Healthcare Group
Site/Facility Operator: Saber Healthcare Group
Site/Facility Address: 1404 Golf Park Dr.
Lake Ariel, PA 18436
Latitude: 41.45459 **Longitude:** -75.37297
County/Parish: Wayne County
Permit Number: PA0060038 (Expired)
NAICS Code: 623110 **SIC:** 8051
Unique Project #: ECAD-525

Site/Facility Representative(s):	Point of Contact
Ken Fulford (Operator – Consultant)	☒
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Unique Project#: ECAD-525

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I. Introduction

On November 9, 2023, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a domestic wastewater inspection of the Julia Ribaudó Extended Care Center wastewater treatment plant (WWTP) (hereinafter, “WWTP” or “Facility”). The purpose of the inspection was to observe compliance with applicable state and Federal regulations, including the Clean Water Act (CWA), and to verify discharge of treated domestic wastewater without an effective PADEP (Pennsylvania Department of Environmental Protection) National Pollutant Discharge Elimination System (NPDES) Permit. The Facility’s NPDES Permit No. PA0060038 was issued on November 1, 2012 and expired on October 31, 2017 (hereinafter, the “Permit”).

A. Inspection Opening Conference

The EPA Inspection Team arrived at the facility at est. 1:00PM for the inspection. Inspectors met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Edward Simas	Environmental Protection Agency	(215) 814- 2120	Simas.Edward@epa.gov
Shane McAleer	Environmental Protection Agency	(215) 814-5616	McAleer.shane@epa.gov
Site/Facility Representatives			
Ken Fulford	KLFA, Inc. – Operator	(610) 216- 0150	dolesluj@hotmail.com
Richard Roman	Building Maintenance – Saber Healthcare	(646) 712-6128	Not provided
State or County Representatives			
Brandon Shihinski	Pennsylvania Department of Environmental Protection (PADEP)	(570) 931-6043	brshihinski@pa.gov

Edward Simas and Shane McAleer displayed their credentials to lead operator, Ken Fulford and maintenance worker, Richard Roman (hereinafter, “facility representatives”) at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit. A copy of the expired Permit is provided in Attachment 2. The EPA Inspection Team informed facility representatives 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 and cool. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
MOSCOW 4.9 E, PA US US1PAWN0004	11/4/2023	0.00
MOSCOW 4.9 E, PA US US1PAWN0004	11/5/2023	0.00
MOSCOW 4.9 E, PA US US1PAWN0004	11/6/2023	0.00
MOSCOW 4.9 E, PA US US1PAWN0004	11/7/2023	0.06
MOSCOW 4.9 E, PA US US1PAWN0004	11/8/2023	0.00
MOSCOW 4.9 E, PA US US1PAWN0004	11/9/2023	0.00

C. Summary of the Site/Facility

The Julia Ribaudo Extended Care Center is a nursing home offering short-term and long-term nursing care, hospice care, senior respite care and senior rehabilitation services. Domestic sewage generated by the nursing home is treated on-site at the WWTP, which is an extended aeration plant operating at a design flow of 12,500 gpd. Wastewater from the nursing home flows via 2 four-inch PVC gravity lines to a pump station which contains 2 grinder type pumps. When floats are activated, wastewater flows to a 20,000-gallon equalization (EQ) tank, which also contains 2 grinder type pumps. A skimmer pump in the EQ tank doses DELPAC, a cationic aluminum chloride hydroxide sulfate coagulant. The system operates continuously 24 hours, 7 days/week. Once the EQ tanks floats are activated, wastewater is pumped from the EQ tank to the splitter box. The splitter box routes wastewater to the aeration tank and back to the EQ tank in about a 90/10 ratio. At the aeration tank, a dry polymer (Clarifloc NE-560) is added to aid in solids settling. The supernatant travels over a weir to a settling tank. From the settling tank, the solids are discharged to a wasted sludge chamber and the supernatant is discharged to the ultraviolet light (UV) chamber for disinfection. After the UV chamber, the treated effluent is discharged to an unnamed tributary to Ariel Creek (Outfall 001).

II. Site Activity

During the inspection, the EPA Inspection Team observed the nursing home's WWTP. This included a tour of the pump station, EQ tank, aeration basin, UV chamber, clearwell, and Outfall 001 to Ariel Creek. The Facility's NPDES permit is currently expired, and all inspection observations were made pursuant to the Facility's general operation practices. The observations

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Shane McAleer and are provided in Attachment 1 (Julia Ribaudo Photo Log).

Saber Healthcare is the owner of the nursing home and hires engineering company, Farnham & Associates to maintain the Facility's wastewater records and maintenance. Additionally, Farnham & Associates hires KLFA, Inc. representative Ken Fulford to be the licensed wastewater systems operator of the WWTP. Mr. Fulford has been certified by the PADEP. At the time of the inspection, a representative from Saber Healthcare, Richard Roman, addressed Facility maintenance as well as recorded pH and flow, and collected the 8-hour composite sample on site. Mr. Fulford stated that his duties include sampling the fecal coliform sample and training others how to maintain the Facility when he is not on site.

III. Observations

a. Permit Expiration Details

Observation 1: The PADEP did not renew the Facility's permit (PA0060038) due to the submittal of a late permit application past the 180 days acceptable for automatic extension. On 9/30/2022, the Facility submitted another application to address previous permit application completeness concerns. A revised draft permit is currently under internal review by PADEP. Facility representatives stated that the original delay for the permit submittal was due to a misunderstanding on which party was responsible for the submittal of the permit application documents.

b. General Facility Operations

Julia Ribaudo Extended Care Wastewater Process Flow Diagram

A fact sheet and process flow diagram was provided to the EPA by PADEP dated September 27, 2022 (Attachment 3).

Observation 2: Facility representatives stated during the inspection that this process flow diagram is outdated with portions of the plant no longer in operation. The portions of the plant no longer in operation included: the sand filters (Photos DSCN3956, DSCN3957), secondary clarifier (Photo DSCN3949), and flash mixing tank (Photo DSCN3948) as noted in the diagram. Facility representatives mentioned that Farnham and Associates, the Facility's engineering company, is responsible for updating the process flow diagram and fact sheet.

Clarifier

During the inspection, the EPA Inspection Team began at the pump station where the influent sludge is pumped into a 20,000-gallon EQ tank (Photos DSCN3931 – DSCN3932). From the EQ tank, the influent travels to an aeration basin before flowing to a rectangular clarifier.

Observation 3: The EPA Inspection Team noticed that there was algal & solids built up at the trough and weir of the clarifier (Photos DSCN3943 – DSCN3944). The treated effluent appeared clear with a well settled sludge blanket on the bottom.

Settling Tank Solids Transfer

The EPA Inspection Team walked to the settling tank from the clarifier. In the past, this area was utilized as a secondary clarifier and flash mixing tank. Presently, it contains no mixing or chemical dosing and is utilized for solids settling before UV disinfection. During the inspection, the EPA Inspection Team observed how the settled solids transferred to the wasted sludge reservoir. A manual sump pump transfers the sludge to a wasted sludge reservoir. Once the sump pump turned on, it appeared that it stirred the settled sludge up to the surface, turning the liquid cloudy (Photo DSCN3952). The increase in turbidity may affect UV-disinfection in the next step of the treatment train.

Sand Filters

The EPA Inspection Team observed the sand filters that have been inoperable for years (Photos DSCN3956 – DSCN3957). EPA asked Facility Representatives if the filters had ever been cleaned out after the final use. Facility representatives replied that it was once pumped out and taken apart, however the sand filters have been out of operation in the same location for at least 30 years. It is unclear if there is a plan to remove them from the treatment process or restore them back to proper operable conditions. The Facility stated that it would be costly to disconnect them from the treatment system.

UV PLC readout

Observation 4: The programmable logic controller (PLC) screen did not display power readouts of the UV chamber at the time of inspection (Photo DSCN3970). It was unclear how long it has been out of operation or if it would be fixed. Facility representatives stated that it normally operates at 2.0 mW/cm².

Chemical Identifier Labeling

The EPA Inspection Team observed a bin of a white dry chemical that Facility representatives stated as “Clarifloc NE 560” (Photo DSCN3969). Facility representatives explained that this is a dry polymer added to the aeration basin to aid in solid settlement. This bin did not have a chemical identifier.

Outfall Location Access

The EPA Inspection Team travelled to the location offsite designated by coordinates on the Permit as the location for Outfall 001, but were not able to locate nor access the outfall due to the outfall's location on private property and a lack of outfall signage (Photos DSCN3971 – DSCN3972).

c. Effluent Limit Exceedances & Previous Plant Operation Issues

A list of recent exceedances of Permit effluent limits is provided in Table 3 below. (Note that these would be potential Permit violations if the Permit was not expired). Facility representatives stated that exceedances and issues in the past may have been due to the laundry wastewater being discharged directly to the plant. In May 2018, this practice was discontinued with monthly samples analyzing how much surfactant was left in the wastewater. The practice also caused the plant to exceed hydraulic loading pushing flow through the clarifier prior to proper treatment. During the inspection, the EPA team did not observe any signs of surfactants, however the Facility has a history of effluent limit exceedances according to a PADEP notice of violation (“NOV”, see Attachment 4).

Table 3. Julia Ribaudó Effluent Limit Exceedances

Outfall #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type	% Exceeding Limit
001	12/31/2018	Coliform, fecal general	2420	2000	CFU/100 mL	GEO MEAN	21%
001	5/31/2019	Oxygen, dissolved [DO]	6	7	mg/L	MINIMUM	14%
001	5/31/2019	Coliform, fecal general	224	200	CFU/100 mL	GEO MEAN	12%
001	6/30/2019	Oxygen, dissolved [DO]	5.5	7	mg/L	MINIMUM	21%
001	7/31/2019	Oxygen, dissolved [DO]	5.2	7	mg/L	MINIMUM	26%
001	8/31/2019	Oxygen, dissolved [DO]	6.2	7	mg/L	MINIMUM	11%
001	2/29/2020	pH	9.4	9	SU	MAXIMUM	40%

Outfall #	Monitoring Period End Date	Parameter Name	DMR Value	Permit Limit	Units	Limit Type	% Exceeding Limit
001	6/30/2021	Oxygen, dissolved [DO]	5.4	7	mg/L	MINIMUM	23%
001	9/30/2021	Phosphorus, total [as P]	0.81	0.5	mg/L	MO AVG	62%
001	10/31/2021	Phosphorus, total [as P]	0.82	0.5	mg/L	MO AVG	64%
001	5/31/2022	Coliform, fecal general	240	200	CFU/100 mL	GEO MEAN	20%
001	5/31/2023	Coliform, fecal general	623	200	CFU/100 mL	GEO MEAN	212%
001	6/30/2023	Phosphorus, total [as P]	1.28	0.5	mg/L	MO AVG	156%
001	7/31/2023	Nitrogen, ammonia total [as N]	13.7	3	mg/L	MO AVG	357%
001	7/31/2023	Phosphorus, total [as P]	0.84	0.5	mg/L	MO AVG	68%
001	8/31/2023	Phosphorus, total [as P]	0.93	0.5	mg/L	MO AVG	86%
001	9/30/2023	Phosphorus, total [as P]	2.62	0.5	mg/L	MO AVG	424%

IV. Records Review

The EPA Inspection Team reviewed documentation including: Contract Operations – General Work Plan (Photo DSCN3918), Site Specific Management Plan (Photo DSCN3919), Julia Ribaudo WWTF – Standard Operating Procedure (Photo DSCN3920), and the Julia Ribaudo WWTF Operations Manual (Photo DSCN3921). The EPA Inspection Team also reviewed the Facility’s calibration (Photo DSCN3922), daily operation (Photo DSCN3923), and effluent monitoring bench sheets (Photo DSCN3924). The EPA Inspection Team also asked what happens to the dry sludge cake. Facility Representatives provided the August 8th, 2023 Bill of Lading (Photo DSCN3925) which noted that 7,000 gallons of sludge was transferred to the Wyoming Valley Sewer Authority. Prior to the inspection, the EPA Inspection Team reviewed state correspondence, the Julia Ribaudo WWTP Process Flow Diagram, and the PADEP NOV. A copy of the Facility’s expired Permit is provided under 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 3:31PM.

VI. List of Attachments

- Attachment 1: Julia Ribaudo Compliance Evaluation Photo Log
- Attachment 2: NPDES Permit No. PA0060038 (9/28/2012)
- Attachment 3: WWTP Process Flow Description
- Attachment 4: PADEP-issued Notice of Violation (8/2/2018)