



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 06/11/2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Wastewater
Site/Facility Name: Tuscarora State Park Sewer
Permittee(s): Commonwealth of PA, DCNR, Bureau of State Parks, Tuscarora
Site/Facility Operator: DCNR
Site/Facility Address: 687 Tuscarora Park Road
Barnesville, PA 18214
Latitude/Longitude: 40.806944/ -76.023056
County/Parish: Schuylkill County
Permit Number: PA0032077
NAICS/SIC Code: 221320/4952
DSB-ID #: ECAD-5649

Site/Facility Representative(s):

Point of Contact

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I. Introduction

On June 11, 2024, an inspection team composed of staff from the U.S. Environmental Protection Agency (EPA) Region 3 (hereinafter, "EPA Inspection Team") conducted a wastewater inspection of Tuscarora State Park's Wastewater Treatment Plant (hereinafter, "Facility"). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the Facility's Pennsylvania National Pollutant Discharge Elimination System (NPDES) Permit No. PA0032077 (hereinafter, the "Permit") and applicable State and Federal regulations. The Permit is included as Attachment A.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the site at approximately 8:09 AM for the inspection. Inspectors met with the following site representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors			
Monica Crosby	Inspector	(410) 305-2930	crosby.monica@epa.gov
Steven Maslowski	Inspector	(215) 814-2371	maslowski.steven@epa.gov
Brian Tolton	Inspector In-Training	(215) 814-3291	tolton.brian@epa.gov
Site Representatives			
Robert Sweeney	DCNR-Parks	(570) 467-2404	robsweeney@pa.gov
Joe Herbstritt	DCNR-FDC	(717) 787-9290	joherbstri@pa.gov
Stephanie Coontess	DCNR-FDC	(717) 783-3329	scoontess@pa.gov
Lester Miller	DCNR- Tuscarora and Locust Lake Parks	(570) 467-2404	lestmiller@pa.gov
Josh Swoltley	DCNR-Region 4	(215) 453-5011	jswoltley@pa.gov
Rex Bradish	DCNR-Region 4	(570) 406-9198	rbradish@pa.gov
Katherine Macaluso	WWTP Operator	(570) 573-6471	kamacaluso@pa.gov

Monica Crosby and Steven Maslowski displayed their credentials to Facility representatives at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with its Permit.

B. Weather and Precipitation Conditions

During the inspection, weather was mostly sunny. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
MAHANOEY CITY 2 N, PA USC00365344	06/06/24	0
MAHANOEY CITY 2 N, PA USC00365344	06/07/24	0.31
MAHANOEY CITY 2 N, PA USC00365344	06/08/24	0
MAHANOEY CITY 2 N, PA USC00365344	06/09/24	0
MAHANOEY CITY 2 N, PA USC00365344	06/10/24	0
MAHANOEY CITY 2 N, PA USC00365344	06/11/24	0

C. Summary of the Site

The Pennsylvania Department of Conservation and Natural Resources (DCNR) owns and operates Tuscarora State Park Wastewater Treatment Plant. The Facility is a sludge-activated treatment plant that serves Tuscarora State Park and its campground. The Facility has one (1) outlet that discharges into Locust Creek, a tributary to the Little Schuylkill River, and ultimately the Schuylkill River. The Facility's coverage under the Permit became effective on February 1, 2020, and is set to expire on January 31, 2025.

II. Site Activity

The observations from the inspection are described in detail below in the Observations section. Photographs captured during the inspection were taken by Brian Tolton and are provided in Attachment B. Some photos may be omitted but can be made available upon request.

At the time of the inspection, the Facility operator described the treatment process. The Facility was first constructed in the 1960s. The Facility treats about 3,000 gal/day, reaching upwards of 8,000 gal/day on the weekends during peak season. Wastewater flows into one of the Facility's two collection systems. The first collection system receives wastewater from nearby bathrooms and then flows into the second collection system before coming to the wastewater treatment plant (WWTP) (Attachment B, Photo 1). The second collection system receives flow from the first collection system, as well as from Tuscarora State Park's campground. From the second collection system, wastewater is pumped to the headworks of the WWTP and gravity-fed to the Facility's aeration basin (Attachment B, Photos 2 and 3). The aerator blowers are set on a manual timer. The Operator explained that as the dissolved oxygen level goes down and the

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

outside temperature gets hotter, the blowers run more often. To assist with pH levels, the Facility will add soda ash to the aeration tank. To assist with biological processes in the spring months, the Facility will supplement with carbon sources (Attachment B, Photo 4). It was explained that the Facility was using rabbit food, however, they stopped a couple of years ago after finding rabbit food was floating into the clarifier and would regularly need to be scooped out. The Facility then turned to hog food, but at the time of the inspection, they were experiencing problems with the hog food forming grease balls, due to the hog food being fed into the comminutor instead of the aeration tank.

From the aeration tank, wastewater flows into the clarifier (Attachment B, Photos 6 and 7). The Operator stated that in order to remove solids, the clarifier walls are brushed a minimum of three times a week, but usually daily. Solids at the bottom of the clarifier either get returned or wasted. To determine their rate of wasting versus return, the Operator observes the color in the aeration tank, the smell of the sludge, and performs a settleability test. If they are wasting solids, the operator will shut the valve to sludge return and open the valve to the digester (Attachment B, Photo 9). A vac-truck comes in and hauls off the sludge once a year, with the most recent hauling of sludge being November 2023. No sampling of the sludge is conducted prior to it being hauled off. Decant water is returned to the aeration tank (Attachment B, Photo 5). The sludge return runs when the aerator blowers run.

From the clarifiers, wastewater flow enters the chlorine contact chamber (Attachment B, Photo 10). The Operator stated that chlorine is fed manually via chlorine tablets, which is why the WWTP has fluctuations in its chlorine levels (Attachment B, Photo 11). The Facility Operator stated that the chlorine contact chamber is about 20 feet deep and is pumped out with the digester. There is no dechlorination at the Facility. After chlorination, flow goes through a weir and is discharged into Locust Creek via Outfall 001 (Attachment B, Photo 12). The EPA Inspection Team observed a red marker, used to identify the path of the discharge pipe, but was unable to locate the outfall at the time of the inspection (Attachment B, Photo 13).

As part of the inspection, the Operator explained the sampling process and the EPA Inspection Team observed the Facility's lab bench that is used for sample collection (Attachment B, Photo 14). Flow is measured via a flow meter that is positioned after the chlorine contact chamber (Attachment B, Photo 17). The Facility is using a manual 8-hour composite sample for all parameters except fecal coliform and pH, which require a grab sample. To collect their composite samples, the Facility fills a bucket every hour and then takes their samples from that bucket (refer to Observation 2). Samples are taken to CWM Environmental to be analyzed.

The EPA Inspection Team then observed the two collection stations that carry wastewater to the Facility. The first collection station, located at the park's boat launch, pumps waste from a nearby bathroom (Attachment B, Photos 17 and 18). When the wastewater reaches a certain height, it is pumped to the second collection system. The first collection system is equipped with an alarm system, with a green light turning on when the pump is on and running and a red

lamp turning on when there is an issue at the lift station. Both alarms were tested and appeared to be operational at the time of the inspection. The second collection system is located under cover and within the Facility's campground (Attachment B, Photos 19 and 20). The Operator stated that this lift station is washed down every morning to keep things moving. The wastewater flow goes through a grinder, and anything that goes through the grinder goes to the WWTP and goes through the treatment train, where it will then be skimmed out. As a backup mechanism, if the grinder stops working or power goes out, the wastewater flow goes over a trough and through a bar screen. This second collection station runs 24/7, 365 days a year. The second lift station is equipped with an alarm, but the alarm cannot be turned on manually; everything must fail before the alarm goes off.

III.Observations

Effluent Exceedances

Requirement: Part A.1.B and 1.C of the Permit outlines the effluent limitations for the Facility.

Observation 1: As part of the Inspection, the EPA Inspection Team reviewed the Facility's Digital Monitoring Data (DMR) from May 2023 through May 2024. During that time, the Facility had 11 effluent exceedances. The parameters exceeded include dissolved oxygen (DO), total residual chlorine (TRC), and fecal coliform. The full list of exceedances is included as Attachment C.

Additional Sampling

Requirement: Part III.B.7 of the Permit states, "If the permittee monitors any pollutant at monitoring points as designated by this permit, using analytical methods described in Part A III.A.4. herein, more frequently than the permit requires, the results of this monitoring shall be incorporated, as appropriate, into the calculations used to report self-monitoring data on the DMR. (40 CFR 122.41(l)(4)(ii))"

Observation 2: At the time of the Inspection, the Facility Operator stated the aeration basin is sampled for dissolved oxygen (DO) five times a week for process control, but no additional samples are taken from the

permitted monitoring point. Samples are collected with a YSI 550A DO meter.

Representative Sampling

Requirement: Part III.A.1 of the Permit states, "Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity (40 CFR 122.41(j)(1)). Representative sampling includes the collection of samples, where possible, during periods of adverse weather, changes in treatment plant performance and changes in treatment plant loading. If possible, effluent samples must be collected where the effluent is well mixed near the center of the discharge conveyance and at the approximate mid-depth point, where the turbulence is at a maximum and the settlement of solids is minimized. (40 CFR 122.48, 25 Pa. Code § 92a.61)"

Observation 3: At the time of the Inspection, the Facility was taking manual 8-hour composite samples from the weir after chlorination (Attachment B, Photo 12). Each hour, over the span of 8-hours, the Operator will use a sample cup and take one scoop of water and place it into a bucket. Samples are then pulled from that bucket.

Proper Operation and Maintenance

Requirement: Part B.E.2 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 includes, but is not limited to, adequate laboratory controls including appropriate quality assurance procedures. This provision also includes the operation of backup or auxiliary facilities or similar systems that are installed by the permittee, only when necessary to achieve compliance with the terms and conditions of this permit. (40 CFR 122.41(e))"

Observation 4: The EPA Inspection Team observed vegetation building up in the clarifier (Attachment B, Photos 7 and 8).

Observation 5: At the time of the inspection, there was sludge observed in the chlorine contact chamber. The Facility Operator stated that sludge is skimmed when observed. EPA communicated that sludge should be addressed before reaching the chlorine contact chamber. There was sludge observed on the weirs from the clarifier, prior to the chlorine contact chamber.

Observation 6: Rags were observed inside, and there was a slight odor origination from the pump station that sits adjacent to the boat launch (Attachment B, Photo 19).

Records Keeping

Requirement: Part III. A. 2 of the Permit states, "Except for records of monitoring information required by this permit related to the permittee's sludge use and disposal activities which shall be retained for a period of at least 5 years, all records of monitoring activities and results (including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records), copies of all reports required by this permit, and records of all data used to complete the application for this permit shall be retained by the permittee for 3 years from the date of the sample measurement, report or application. The 3-year period shall be extended as requested by DEP or the EPA Regional Administrator."

Observation 7: At the time of the inspection, EPA requested waste manifest for removal of solids. These documents were not submitted to EPA.

IV. Records Review

As part of the inspection, the EPA Inspection Team reviewed the following documentation: Operator's daily worksheet, last twelve (12) months of discharge monitoring reports, the Operator's certification, and the Permit.

V. Closing Conference

After the site 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 10:35am.

VI. List of Attachments

- Attachment A: Permit
- Attachment B: Photograph Log
- Attachment C: Effluent Exceedances