



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): May 1, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Industrial User Inspection
Facility Name: Corry Manufacturing Company
Facility Address: 519 West Main Street, Corry, PA 16407
Facility Latitude: 41.91914° N
Facility Longitude: -79.64629° W
County/Parish: Erie County
Permit No: PAP128223
NAICS Code: 332117
SIC: 3471
Unique Project #: ECAD-495

Facility Representative(s):

Brady Davis, Corry Manufacturing Company
Email: BMDavis@corrymfg.com

Point of Contact



Inspectors:

Chuck Durham, Eastern Research Group
Email: chuck.durhamn@erg.com

(Full list of additional attendees in Table 1)

Report Preparer

7/2/2024

Signature/Date

Chuck Durham, Eastern Research Group

Date

Supervisor

Signature/Date

Mike Greenwald, NPDES 1 Acting Section Chief
EPA Region 3 Enforcement and Compliance
Assurance Division

Date

	TABLE OF CONTENTS	Page
I.	INTRODUCTION.....	3
II.	INSPECTION PROCESS	3
	Inspection Opening Conference	3
	Facility Inspection.....	4
	Records Review	5
	Summary of Observations.....	5
	Chemical Storage	6
	Wastewater Flow in Building 3.....	6
	pH Meter Calibration	6
	Closing Conference	7

Appendix A: Industrial User Requirements (PAP128223)

Appendix B: Photograph Log

I. INTRODUCTION

On May 1, 2024, a representative from EPA Region 3's contractor, Eastern Research Group, and a representative from EPA Region 3 (hereinafter, referred to as the Inspection Team) conducted an industrial user pretreatment inspection at Corry Manufacturing Company (hereinafter, Facility or Corry Manufacturing) in Corry, Pennsylvania. The purpose of the inspection was to evaluate compliance with the requirements of the *Federal Pretreatment Regulations at 40 CFR Part 403*. The inspection also evaluated compliance with Industrial User Requirements (PAP128223; [Appendix A](#)) issued by EPA Region 3 in April 2003. The inspection consisted of conversations with facility personnel and an inspection of the facility's process area, wastewater generating processes, discharge, and sampling location.

The Facility is located at 319 West Main Street, Corry, PA. The Facility is a metal finisher that manufactures aerospace parts for government agencies and the private sector. The Facility employs 300 staff. According to the Facility representatives, there had been no recent physical or process changes to the Facility at the time of the inspection, and none were planned.

The Permittee performs monthly on-site analysis of pH via automated samples. AG Aegis Company, the facility's contractor, conducts sampling once every six months for cadmium, chromium, copper, lead, nickel, silver, zinc, and cyanide. Samples are analyzed by Pace Analytical. Samples are collected from the sump pit in the Facility's basement. Photographs taken during the inspection are included in [Appendix B](#) (Photograph Log) and specific photos related to observations will be specified in the Summary of Observations section of this report below.

II. INSPECTION PROCESS

Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 8:00 AM (EDT) for the inspection. Mr. Chuck Durham of Eastern Research Group and Ms. Allison Gieda and Ms. Erin DeSandro of EPA Region 3 displayed their Clean Water Act inspector credentials to Facility representatives upon entry and explained the primary purpose of the inspection was to evaluate the Facility's compliance relevant to discharge requirements. The Inspection Team explained that any information that the Facility deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 describes the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Chuck Durham, Inspector	Eastern Research Group	(615) 888-2928	chuck.durham@erg.com
Allison Gieda, Inspector	EPA Region 3	(304) 234-0232	gieda.allison@epa.gov

Name	Affiliation	Telephone	Email
Erin DeSandro, Inspector	EPA Region 3	(215) 814-2125	desandro.erin@epa.gov
Facility Representatives			
Brady Davis, Director of Quality	Corry Manufacturing Company	(814) 644-9611	BMDavis@corrymfg.com
Marshall Pike, Plant Manager	Corry Manufacturing Company	(814) 644-8103 ext. 3011	Not provided.

During the opening conference, the Facility representatives informed the Inspection Team that process wastewater is discharged to the City of Corry Wastewater Treatment Plant. The City of Corry does not have an approved pretreatment program and does not issue permits for its industrial users. However, the Facility was notified of applicable limits and monitoring requirements in a June 30, 2005, revised letter of discharge requirements. The June 2005 letter provided discharge standards for an existing facility subject to the metal finishing regulations under 40 CFR 433.15, and denotes that the monitoring frequency for nickel and copper had been reduced to twice per year. For the July – December 2023 reporting period, the Facility reported an average flow of 149 gallons per day (gpd).

The Facility representatives stated that the Facility generates hazardous waste from the electrochemical cut off machines. The machines use sodium nitrate salts mixed with water to lubricate the saws. The spent coolant is spent and collected in 55-gallon drums. This spent coolant contains nickel and chromium and has been identified as hazardous waste. Hazardous waste is hauled off-site by American Waste Management. Spent lubricants and used oils are put into on-site evaporator to burn off water. The remaining contents are drummed and hauled off-site as non-hazardous waste by Penn Ohio Corporation. Scrap metal is recycled.

Facility Inspection

As part of the inspection, the Inspection Team visually observed and photographed Facility conditions in the presence of the Facility representatives (refer to [Appendix B, Photographs 1 through 23](#)).

The Facility receives metal in sheets ranging in size from six to 12 feet. Depending on the customer specifications, parts are formed using various processes, including, cutting, forming, welding, and hydraulic pressing. The Facility also performs metal finishing in the acid room, based on customer demand.

Building 2 of the Facility contains raw material receiving. The Inspection Team did not observe floor drains or process wastewater in this area. Laser cutting is also performed in Building 2.

Building 3 of the Facility is referred to as the Press Building. This building contains 12 hydraulic presses. This building also contains a parts washer. The parts washer uses a citric-based wash to clean parts (Photograph 1). A small tumbler was also observed in Building 3. According to the Facility representatives, water from the tumbler is recycled and not discharged.

Building 1 of the Facility contains two electrochemical cutoff (ECC) machines (Photograph 3). These machines use sodium nitrite salts that were stored in bags. The Inspection Team observed spent coolant collected in 55-gallon drums. The Inspection Team also observed welding and deburring units in this building.

The Inspection Team proceeded to the Facility's Acid Room. According to the Facility representatives, there have been no process operations conducted in the Acid Room since October 2023 and the pickling process had not been performed since before 2021. Upon entering the Acid Room, the Inspection Team observed two tanks as you enter from the process area; according to the Facility representative, these tanks were no longer in use (Photograph 9). In addition, the Facility representative noted that the pickling tank had been disconnected from plumbing and was no longer in use. The wash line consists of the following stages:

- Stage 1 – Vitro-Klene (an alkaline-based cleaner)
- Stage 2 – Cold water rinse with de-ionized water over sink on opposite wall
- Stage 3 – Passivation (25% nitric acid and water mixture)
- Stage 4 – Same as Stage 2
- Stage 5 – Dilute phosphoric acid cleaner (only used upon request from customer)
- Parts are then air-dried.

The Inspection Team proceeded to the tumbling station which consists of two tumblers. The large tumbler typically runs 1 hour per week (Photograph 17). The water is one-pass and then goes into the collection pit behind the unit (Photograph 19). The collection tank overflows to the final sump (Photograph 19). The smaller tumbler operates as a closed-loop unit and is used daily (Photograph 18). Periodically, this unit is drained completely. The water passes through the floor drain underneath the unit and flows directly into the final sump.

Records Review

The Inspection Team reviewed records pertaining to pretreatment requirements. All of the records requested were available for review at the Facility, except as noted below in the Closing Conference section. The following records were reviewed onsite:

- Self-monitoring reports for 2022-2023
- EPA discharge requirements
- Toxic Organics Management Plan (TOMP)
- Most recent manifest from American Waste Management
- Most recent manifest for disposal of solids from evaporator

Summary of Observations

The following section summarizes the Inspection Team's observations relative to the Facility's pretreatment requirements.

Chemical Storage

The Inspection Team observed incompatible chemicals stored next to each other near the Facility's sample pit.

Observation 1. During the walk-through of the Facility, the Inspection Team observed drums of incompatible pH adjustment chemicals (sulfuric acid and sodium hydroxide) stored next to each other near the Facility's sample pit (Photograph 20). Acids and bases should not be stored next to each other because of the potential for a dangerous reaction in the event of a container failure. The Facility should take appropriate measures to store chemicals in such a way that incompatible chemicals are segregated throughout the Facility.

Note: In an email dated 5/9/2024, the Facility representative provided evidence that this concern had been addressed (Photograph 21).

Observation 2. During the walk-through of the Facility, the Inspection Team observed a rubber hose coming from under the Blast Tank (parts washer) next to the hazardous waste storage area in Building 3. The hose was directed into the hazardous waste storage area (Photographs 15-16). There are no floor drains in the hazardous waste storage area. Any liquid discharged from the Blast Tank to the hazardous waste storage area would accumulate in the bermed area.

Wastewater Flow in Building 3

The Inspection Team was informed by the Facility representative that floor drains in Building 3 discharge to a separate outfall and flow to the discharge sump.

Observation 3. During the walk-through of the Facility, the Inspection Team observed floor drains in Building 3 and was informed the floor drains do not flow to the discharge sump and instead have a separate connection to the sewer. When asked if process flows from Building 3 discharge through the same outfall as the floor drains, or if it is pumped to the discharge sump, the Facility representative was unsure. The Facility should take appropriate actions to determine if process wastewater from Building 3 are discharged to the floor drains or to the Facility's designated sample point. If it is determined that the process waste exits Building 3 via the floor drains, the Facility should sample this discharge for all 126 priority pollutants to ensure that no regulated pollutants are included in this wastestream.

pH Meter Calibration

The Facility is not currently conducting a three-point calibration of the pH meter.

Observation 4. The Facility conducts weekly calibration of its pH meter using pH 4 and 7 buffer solutions. However, the Facility's pH measurements sometimes exceed 7 s.u. Therefore, the Facility should conduct a three-point calibration of its pH meter using pH 4, 7, and 10 buffer solutions.

Closing Conference

After the Facility inspection, the Inspection Team met with the Facility representatives for a closing conference and shared their preliminary observations. The 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 the Inspection Team 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, as a result of reviewing additional documentation following the inspection.

During the closing conference, the Inspection Team asked that Facility representatives provide the following additional documentation for review. All requested documents were provided via email on 5/9/2024 and 6/28/2024, and the Inspection Team reviewed them and no additional observations were identified.

- Clear photographs of the inside of the sample pit to identify the number of inlets
- Schematic showing all wastewater flows
- Safety data sheets for the citric-based wash in Building 3 and Cee Bee in Acid Wash Room

The inspection concluded at approximately 10:55 AM (EDT).