



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1600 John F Kennedy Boulevard
Four Penn Center
Philadelphia, Pennsylvania 19103**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 04/20/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment – POTW Inspection
Facility Name: Greater Hazleton Joint Sewer Authority Wastewater Treatment Plant
Permittee(s): Greater Hazleton Joint Sewer Authority (GHJSA)
Facility Operator: Greater Hazleton Joint Sewer Authority (GHJSA)
Facility Address: 500 Oscar Thomas Dr, West Hazleton, PA 18202
Lat/Long: 40.97348 / -76.01966
County/Parish: Luzerne
Permit Number: PA00262921
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN060A

Facility Representative(s):

Laura Motel – Environmental Manager – GHJSA
Phone: (570) 454-0851 x 312 Email: laura@ghjsa.org

Point of Contact



EPA Inspectors:

Aaron Thomson - EPA Inspector (3ED33)
Phone: 215-814-2116 Email: Thomson.aaron@epa.gov

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THOMSON**

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**Report Preparer
Signature/Date**

Aaron Thomson, Enforcement Officer
NPDES Enforcement Section 2 (3ED33)
Four Penn Center
Philadelphia, Pennsylvania 19103

Date

**Supervisor
Signature/Date**

Jessica Duffy, Section Chief
NPDES Enforcement Section 2 (3ED33)
Four Penn Center
Philadelphia, Pennsylvania 19103

Date

Table of Contents

I. Introduction3

 A. Inspection Opening Conference 3

 B. Weather and Precipitation Conditions..... 3

II. Facility Activity.....3

III. Observations4

IV. Records Review6

V. Closing Conference.....8

VI. List of Attachments.....8

I. Introduction

On April 20, 2022, Aaron Thomson (hereinafter, “Inspector Thomson”, “EPA Inspector”) an inspector from the U.S. Environmental Protection Agency (“EPA”) Region III, conducted an on-site inspection of the Greater Hazleton Joint Sewer Authority’s (hereinafter, “GHJSA”, “the Facility”) pretreatment program. GHJSA operates a wastewater treatment facility (WWTF) that is subject to the federal pretreatment regulations, the Clean Water Act (“CWA”), and their National Pollutant Discharge Elimination System (“NPDES”) Permit No. PA00262921. Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (“PADEP”). PADEP representative Chris Laczi was present for the inspection. Inspector Thomson provided the facility with advance notification of the inspection.

A. Inspection Opening Conference

The EPA Inspector arrived at the facility at approximately 11:30 AM for the on-site inspection. Inspector Thomson met with the following facility representatives and PADEP representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA - Philadelphia	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Laura Motel	Environmental Manager – GHJSA	(570) 454-0851 x 312	laura@ghjsa.org
John Ratchko	Lab Director – GHJSA	570-454-0851	
PADEP Representatives			
Chris Laczi	PADEP	570-830-3079	claczi@pa.gov

Inspector Thomson displayed their credentials to Mrs. Motel at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the federal regulatory requirements at 40 CFR Part 403 and any applicable NPDES Permit requirements pertaining to the Facility’s pretreatment program. A copy of the Permit is provided as **Attachment 1**. The EPA Inspector informed Mrs. Motel 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, the weather was sunny with a high of 75 degrees Fahrenheit.

II. Facility Activity

The facility has an approved pretreatment program, which is subject to the federal pretreatment regulations at 40 CFR Part 403.

Based on information supplied by Mrs. Motel, the GHJSA WWTF currently has a rated flow capacity of 13.35 million gallons per day (MGD). The facility has 35 employees and operates 24 hours a day, 7 days a week. The shifts are 8 hours long, starting at 6:45 AM, 2:45 PM and 10:45 PM. There are two operators on duty at all times, an A side and B side, and the operator position is swing shift. All of the Facility's operators are required to have and maintain a Wastewater Operator, Class A, Activated Sludge Certification. The Facility's departments, which include Maintenance, Road Crew, Lab, and Laborers, are scheduled day shift and are on call 24/7. The pretreatment program of GHJSA is managed by Mrs. Motel. Mrs. Motel stated that no major upgrades are currently planned for the Facility.

III. Observations

Inspector Thomson asked Mrs. Motel to describe the process for accepting and identifying new industrial users (IU) and their associated categories, if applicable. Mrs. Motel stated that all new industries must complete a preliminary Industrial Wastewater Discharge Questionnaire (IWDQ) which GHJSA will use to determine if the industry is a categorical industrial user (CIU). Mrs. Motel provided a document outlining this process (**Attachment 2**) as well as three different versions of the Facility's IU application survey (**Attachments 3-5**), with differing lengths/complexities to fit the industry, based on what the Facility decides is appropriate. According to Mrs. Motel, Can Do, Inc., a non-profit industrial/economic development corporation serving Greater Hazleton in Northeastern Pennsylvania, aids GHJSA in the identification of new business that could potentially discharge wastewater to the Facility. Additionally, GHJSA employees use social media and field presence to ensure all new businesses that discharge wastewater to the Facility are identified. Mrs. Motel stated that the Facility also contracts Gannett Fleming to aid in identifying the category of industries that discharge to the Facility as well as creating their permits. Mrs. Motel handles enforcement of their permits, either fining IU's for exceeding their limit, or discontinuing the site's permission to discharge to GHJSA.

Inspector Thomson requested Mrs. Motel describe the Facility's pretreatment program. According to Mrs. Motel, the Facility has a total of nine (9) permitted IUs. Of the nine IU's, three are CIUs, six are significant industrial users (SIU), and of the six SIUs, three were recently added. Mrs. Motel provided a document detailing the IUs (**Attachment 6**). Mrs. Motel stated that all IUs are sampled and inspected by the Facility at least once per year. Mrs. Motel provided sample inspection checklists used by the Facility (**Attachment 7 and 8**). Mrs. Motel stated that Facility staff receive on-the-job training for sampling. Mrs. Motel stated that, historically, the Facility has used Suburban Testing Lab to analyze their compliance samples, as well as provide prepared sample bottles with preservatives, but have recently had issues with them. Mrs. Motel stated that the Facility is transitioning to using Microbac Laboratories (Harrisburg, PA), but have also used Kirby Health Center and Hawk Environmental. The IU's conduct self-monitoring sampling events and submit self-monitoring compliance reports to the Facility at least twice per year.

According to Mrs. Motel, the Facility accepts hauled non-hazardous waste including food waste, septage, sludge and other. Before accepting the hauled waste, the Facility will require sampling/to characterize the waste stream and will assign a pin number to the hauler that will need to be used before discharging, in order to control the hauled loads accepted by the Facility. According to Mrs. Motel, the Facility "accepts 1-2 loads of ash waste per week and accepts loads

of fats, oils and grease per load, determined by the current conditions of the plant. The hauled in sludge is processed through a centrifuge and then goes to an incinerator. The final product is fly ash, which is hauled to the landfill by Waste Management. If the Incinerator is shut down for maintenance or operational issues, the processed sludge is hauled directly to the landfill which is also hauled by Waste Management.” In addition to influent and effluent sampling, the Facility samples sludge, ash and other wastes leaving the Facility, and provided a sampling schedule that can be seen as **Attachment 9**.

During the inspection, Mrs. Motel led Inspector Thomson on a tour of the Facility. Inspector Thomson observed the Facility’s pH meter calibration log (**Attachment 11, Photograph 1**) before being led to the Facility’s hauled influent waste acceptance site (**Attachment 11, Photograph 2**). Hauled influent enters a Raptor Complete Plant grit removal/screening device (**Attachment 11, Photograph 3**) before it passes through the hauled influent sampling point (**Attachment 11, Photograph 4**). Hauled waste is only accepted after a PIN is entered at the Facility’s hauled waste control console (**Attachment 11, Photograph 5**). Inspector Thomson was then led into the hauled waste building where a hauled waste sign-in sheet (**Attachment 11, Photograph 6**), hauled waste files sorted by company (**Attachment 11, Photograph 7**), and a blank copy of GHJSA’s hauled waste manifest (**Attachment 11, Photograph 8**) were observed. Inspector Thomson was then led to the influent composite sampler (**Attachment 11, Photograph 9**), including a thermometer reading approximately 4 degrees Celsius (**Attachment 11, Photograph 10**). The influent sampling location and influent flow meter were also observed at this location (**Attachment 11, Photograph 11**), as well as the influent flow meter console (**Attachment 11, Photograph 12**). According to Mrs. Motel, the flow meters are calibrated by Moyer Instruments twice a year. Inspector Thomson was then led to the Facility effluent composite sampler (**Attachment 11, Photograph 13**) with the thermometer reading approximately 4 degrees Celsius (**Attachment 11, Photograph 14**) located at the effluent sampling location (**Attachment 11, Photograph 15**). Inspector Thomson was then led to the pH buffer storage location where containers with 4.0 pH buffer (**Attachment 11, Photograph 16**), a 10.0 pH buffer (**Attachment 11, Photograph 17**) and a 7.0 pH buffer (**Attachment 11, Photograph 18**) were observed. At the time of the inspection none of the buffers were expired. This concluded the tour of the Facility.

As part of the pretreatment inspection, Inspector Thomson requested Mrs. Motel lead a site visit and mock inspection of Henkel, one of the Facility’s IU’s. According to Mrs. Motel, Henkel, a soap and detergent manufacturing company, is a categorical industrial user (CIU) under 40 CFR part 417, soap and detergent manufacturing point source category. Henkel blends and packages liquid detergent and liquid hand soap and body wash. The majority of their wastewater stream comes from tank cleanings. Mrs. Motel stated that in 2017-2018 Henkel was in significant non-compliance due to exceeding permitted discharge levels of zinc, but have since remained in compliance. The pretreatment process at Henkel includes collecting wastewater generated when cleaning emptied process tanks, monitoring and adjusting the pH, and adding an anti-foam agent before being discharged to the Facility. Mrs. Motel and Inspector Thomson were received by Henkel’s staff on entering the site, and after Inspector Thomson explained the purpose and scope of the Facility’s pretreatment inspection, Mrs. Motel led a mock inspection of Henkel, including visiting the effluent sampling point (**Attachment 11, Photographs 19 and 20**), the pretreatment process tanks (not photographed at request of Henkel due to CBI concerns) and the production process tanks (containing soap or detergent) whose cleanings contribute to the wastewater stream

discharged to the POTW (**Attachment 11, Photograph 21**). At Inspector Thomson's request, Mrs. Motel described how the Facility would typically sample from Henkel's sampling location (**Attachment 11, Photographs 19 and 20**). This concluded the tour of Henkel.

A checklist was utilized during the review and is provided as **Attachment 12**. The checklist was completed by Inspector Thomson using information provided by Mrs. Motel. Photographs were taken during the inspection by Inspector Thomson. Photographs pertaining to the inspection report are provided in **Attachment 11**. Not all photographs taken during the inspection are included in this report.

According to the Facility, Multi-Plastics Extrusions, Inc. is a significant non-categorical user. Multi-Plastics Extrusions, Inc. extrudes polystyrene and polyethylene pellets into plastic film used in the food processing industry and for windows in envelopes. Micro-Plastics Extrusions, Inc. recirculates all process water in closed loop systems with the exception of small batch discharges (<100 gallons) that require the Control Authority's approval prior to discharge to the sanitary sewer system. 40 CFR Part 414, Organic Chemicals, Plastics and Synthetic Fibers, Subpart D thermoplastic resins, applicability includes process wastewater discharges resulting from the manufacture of products classified under SIC 28213 thermoplastic resins including polyethylene and polystyrene.

The Facility's permit states "Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): at Outfall 001 and influent sampling location" referencing a chart describing the effluent limitations for the Facility's permitted discharge from Outfall 001. During the inspection, Inspector Thomson observed no signs or labels identifying the sampling locations (**Attachment 11, Photographs 9, 11, 13 and 15**), and no signage/labels that matched the locations provided in the permit and communicated this to Mrs. Motel. On May 2nd, Mrs. Motel provided Inspector Thomson photographs of the composite samplers located each sampling point, with labels added reading "INFLUENT SAMPLER" and "EFFLUENT SAMPLER/OUTFALL 001", respectively (**Attachment 118**).

IV. Records Review

Prior to the inspection, Inspector Thomson requested the following records be submitted via email two weeks before the inspection or up to two weeks after the inspection (see **Attachment 10** for the Records Request):

- Narrative description of the current wastewater treatment process at the facility;
- copies of all NPDES permit applications/permits from past 3 years;
- copies of all discharge monitoring reports for last 3 years; an excel file including a table of all exceedances for effluent limits for NPDES permit for the last 3 years;
- any correspondence with PADEP for the last 3 years regarding formal or informal enforcement actions;
- for each of the identified industrial users (IUs), the IUs permit and/or discharge limit controlling document, categorical status, monthly average flow in gallons per day, spill plans/slug control plans/best management practices plan, copies of the IU self-monitoring

reports including lab sample reports for the past 3 years, list of pollutants the POTW samples with identifying details;

- map of service area;
- copies of all local sewer ordinances;
- copies of all intergovernmental sewer agreements;
- standard operating procedures including a description of the POTW's Industrial User Inventory (Industrial Waste Survey) and Characterization Procedures, copies of the sampling plan/protocol/QAPP, enforcement response plan, and basic IU inspection procedures;
- copies of all inspection reports for the identified IU's;
- compliance evaluations, compliance reports and notices submitted by the IU's for the past 3 years;
- copies of all enforcement actions taken against each IU for the past 3 years; each pass through/interference occurrence identified and actions taken to prevent future occurrences

During the inspection, Mrs. Motel provided the following information/documents which were reviewed by Inspector Thomson (and were additionally reviewed by state counterparts):

- Facility permit (**Attachment 1**);
- GHJSA acceptance criteria for new users (**Attachment 2**);
- GHJSA IU survey questionnaires (**Attachments 3-5**);
- Facility IU info (**Attachment 6**),
- GHJSA inspection checklist (**Attachments 7, 8**);
- Facility sampling checklist (**Attachment 9**);
- Facility DMR's (2020-2023 reviewed, copies of 2020 and 2021 provided as **Attachments 13-116**);
- Facility sampling QA/QC procedures (reviewed, no copy provided);
- Facility spill/slug prevention plan (reviewed, no copy provided);
- Henkel (IU) permit (**Attachment 117**);
- Henkel's SMR for the past 3 years (**Attachments 301-309**);
- a copy of the most recent completed inspection form/report of Henkel conducted by the Facility (**Attachments 297-300**).

After the inspection, on 5/2/2023, Mrs. Motel sent emails containing photographs of labels added to composite samplers (**Attachment 118**), the GHJSA sample checklist (**Attachment 9**), the GHJSA inspection checklist (**Attachments 7 and 8**) and the GHJSA survey questionnaire (**Attachments 3-5**). On 5/3/2023 Mrs. Motel sent a link to the Facility's DMR's that Inspector Thomson was unable to access. Between 6/24/2023 and 6/25/2023 Mrs. Motel sent emails containing copies of the Facility's 2020 and 2021 discharge monitoring reports (**Attachments 13-116**). On 6/28/2023 Mrs. Motel sent a copy of Henkel's permit, issued by the Facility (**Attachment 117**). On 6/29/2023 Mrs. Motel, via email, sent a copy of the Facility's 2022 DMR files (**Attachments 119-296**). On 6/30 Mrs. Motel, via email, sent copies of Henkel's most recent compliance inspection reports (conducted by the Facility) (**Attachments 297-300**) and copies of Henkel's compliance monitoring reports (**Attachments 301-309**).

At the time of the inspection, Inspector Thomson requested copies of all documents reviewed, as of writing this report a copy of the spill/slug prevention plan was not provided.

Inspector Thomson completed the Pretreatment Checklist using information provided by the Facility during the inspection, and by observations made by Inspector Thomson during the inspection (Attachment 12).

V. Closing Conference

After the facility inspection, the EPA Inspector met with the facility representatives for a closing conference. The EPA Inspector shared preliminary observations with the facility. The EPA Inspector 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 2:00 PM

VI. List of Attachments

- Attachment 1.** Facility Permit
- Attachment 2.** GHJSA IPP new users
- Attachment 3.** GHJSA IU Survey Questionnaire (Short Form)
- Attachment 4.** GHJSA IU Survey Questionnaire (Mid Form)
- Attachment 5.** GHJSA IU Survey Questionnaire (Long Form)
- Attachment 6.** IU info
- Attachment 7.** GHJSA Inspection Checklist (Short Form)
- Attachment 8.** GHJSA Inspection Checklist (Long Form)
- Attachment 9.** Facility sampling checklist
- Attachment 10.** Pre-inspection email
- Attachment 11.** Photo log
- Attachment 12.** Hazleton POTW Checklist
- Attachment 13-116.** Facility DMR's 2020-2021
- Attachment 117.** Henkel WW Discharge Permit 06
- Attachment 118.** Facility emailed photos 5_2
- Attachment 119-296.** Facility DMR's 2022
- Attachment 297.** Henkel Routine Comp Report Jan - June 2021
- Attachment 298.** Henkel Routine Comp Report July - Dec 2021
- Attachment 299.** Henkel Routine Comp Report Jan - June 2022
- Attachment 300.** Henkel Routine Comp Report July - Dec 2022
- Attachment 301.** Henkel Sample Results Report 5-19-2021
- Attachment 302.** 302 - Henkel Sample Results Report 11-04-2021
- Attachment 303.** Henkel Sample Results report 11-8-2021
- Attachment 304.** Henkel Sample Results Report 3-14-2022
- Attachment 305.** Henkel Sample Results Report 4-12-2022
- Attachment 306.** Henkel Sample Results Report 10-20-2022

Attachment 307. Henkel Sample Results Report 3-22-2023

Attachment 308. Henkel Sampling Results Report 9-29-2022

Attachment 309. Henkel Sample Results Report 3-28-2023