



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2029

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): September 26-28, 2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection– Publicly Owned Treatment Works (POTW)
Facility Name: City of Reading Wastewater Treatment Plant
Permittee(s): City of Reading
Site/Facility Operator: City of Reading
Facility Address: 899 Morgantown Road Reading, PA 19607
Lat/Long: 40.303622, -75.91991
County/Parish: Berks
Permit Number: PA0026549
NAICS & SIC Codes: 221320/4952
Unique Project #: 3E23WN067A

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Table of Contents

TABLE OF CONTENTS 2

I. INTRODUCTION..... 3

A. READING WWTP - OPENING CONFERENCE 3

B. READING WWTP - BACKGROUND INFORMATION 3

C. READING WWTP - INDUSTRIAL PRETREATMENT PROGRAM FILE REVIEW 4

II. IU INSPECTION- SUPER SUDS. 6

A. SUPER SUDS - OPENING CONFERENCE 6

B. SUPER SUDS - BACKGROUND INFORMATION 6

C. SUPER SUDS - OBSERVATIONS..... 7

III. IU INSPECTION- READING TRUCK BODY, LLC..... 7

A. READING TRUCK BODY, LLC - OPENING CONFERENCE 7

B. READING TRUCK BODY, LLC- BACKGROUND INFORMATION 7

C. READING TRUCK BODY, LLC - OBSERVATIONS..... 8

IV. CLOSING CONFERENCES 11

V. LIST OF ATTACHMENTS..... 11

I. Introduction

On September 26-28, 2023, Inspector Jim Kline (Inspector Kline) from the U.S. Environmental Protection Agency (EPA) Region 3, National Pollutant Discharge Elimination System (NPDES) Section conducted an on-site Pretreatment Compliance Inspection (PCI) of the City of Reading Wastewater Treatment Plant (hereinafter “Reading WWTP”) Pretreatment Program. The Reading WWTP is located at 899 Morgantown Road Reading, PA 19607 (**See Attachment #1- Photos #1 & #2**). The purpose of the inspection was to observe the Reading WWTP Pretreatment Program’s compliance with the Clean Water Act (CWA), the applicable Federal Pretreatment Regulations, and the Facility’s National Pollutant Discharge Elimination System (NPDES) permit ID: PA0026549 (**See Attachment #2**). Prior to the PCI, the Pennsylvania Department of the Environment (“PADEP”) was notified of the inspection. The PADEP did not send a representative to attend the PCI. Inspector Kline did provide Reading WWTP advanced notice of the PCI.

All information included in this report is the result of observations made by Inspector Kline, statements made by Reading WWTP, Super Suds and/or Reading Truck Body representatives, materials shown to Inspector Kline by Reading WWTP, Super Suds and/or Reading Truck Body representatives, and/or documents provided by Reading WWTP, Super Suds and/or Reading Truck Body representatives to Inspector Kline at the time of, or subsequent to, the inspection.

A. Reading WWTP - Opening Conference

Inspector Kline arrived at Reading WWTP at 12:30PM on Tuesday September 26, 2023. Upon arrival, Inspector Kline presented his credentials to Mr. Jeffrey Hill, Environmental Coordinator. Inspector Kline proceeded to conduct an Opening Conference with Mr. Hill. Mr. Hill introduced Inspector Kline to Mr. William Reilly, Wastewater Treatment Manager. Mr. Reilly did not attend the entire opening conference.

Inspector Kline informed Mr. Hill that any information that Reading WWTP deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. Inspector Kline informed Mr. Hill that photographs would be taken during the inspection (photographs are provided in Attachment #1 of this report). Mr. Hill did not make any CBI claims.

B. Reading WWTP - Background Information

Reading WWTP is a wastewater treatment plant owned and operated by the City of Reading. According to the PADEP-issued NPDES Permit, Reading WWTP has a hydraulic capacity of 20.5 million gallons per day. Mr. Hill stated the actual flow is near 15.5 million gallons per day. The NPDES Permit is in effect from May 1, 2023, until April 30, 2028. Reading WWTP discharges to the Schuylkill River.

According to Mr. Hill, the Reading WWTP services the City of Reading along with twelve other townships or municipalities. Mr. Hill stated jurisdictional agreements were all updated in April 2020.

Inspector Kline asked when the last time Reading WWTP evaluated their local limits for the Pretreatment Program. Mr. Hill stated the local limits were last evaluated in 2014. Mr. Hill stated this is something they will have to work on to update. Inspector Kline asked Mr. Hill if Reading WWTP was current with all EPA annual reporting requirements. Mr. Hill stated Reading WWTP is current and has not been late with annual reporting. The most recent Annual Report that Reading WWTP submitted was in 2022 (**See Attachment #3**).

Inspector Kline asked Mr. Hill if Reading WWTP accepts any hauled-in wastes. Mr. Hill stated they do not accept hauled-in wastes. Inspector Kline asked Mr. Hill if Reading WWTP had a Fats Oil and Grease (FOG) Program. Mr. Hill stated the city does not have such a program.

C. Reading WWTP - Industrial Pretreatment Program File Review

Inspector Kline conducted an Industrial Pretreatment Program File Review at Reading WWTP. According to Mr. Hill, Reading WWTP currently has forty-two permitted industrial users (IUs). Inspector Kline asked Mr. Hill if he had a current listing of the permitted IUs. Mr. Hill stated he maintains annual spreadsheets that identify their IUs. Inspector Kline requested and received spreadsheets for 2023 (**See Attachment #4**), 2022 (**See Attachment #5**), and 2021 (**See Attachment #6**). According to Mr. Hill, ten of the IUs are categorical industrial users (CIUs).

Inspector Kline asked Mr. Hill how Reading WWTP identifies potential industrial users. Mr. Hill stated the city has a Codes Inspector. If they identify a possible IU, they will mail out an application to the location. Inspector Kline requested and received a copy of the application (**See Attachment #7**). Mr. Hill added that anyone identified as having a business permit or who applies for one will also be required to complete an application. Inspector Kline asked Mr. Hill how long each IU Permit is valid. Mr. Hill stated each IU Permit is valid for three years.

Inspector Kline asked Mr. Hill if inspections and/or sampling are conducted for the IUs. Mr. Hill stated each IU is inspected annually. Mr. Hill added all IUs are sampled at least twice annually and CIUs are sampled quarterly. Mr. Hill stated their in-house lab conducts some analytical analysis (TSS, BOD, pH, color, and ammonia) here. Mr. Hill added MJ Reider, their contracted third-party lab, does the remaining analysis for metal, oil and grease and phenols.

Inspector Kline asked Mr. Hill if any of the permitted IUs caused pass through or interference at the Reading WWTP. Mr. Hill stated there was an incident that occurred on December 30, 2022, at Reading Truck Body, LLC (Reading Truck). Inspector Kline asked Mr. Hill to describe the event. Mr. Hill stated the incident occurred over Christmas while he was on leave. Mr. Hill stated an employee at Reading Truck emptied untreated wastewater from a portable Frac tank directly into a sewer manhole which led directly to the Reading WWTP. Inspector Kline asked Mr. Hill if any Reading Truck representative reported the incident. Mr. Hill stated nobody from Reading Truck reported the incident, nor did anyone from Reading Truck notify the Reading WWTP before they did it. Inspector Kline asked Mr. Hill how the Reading WWTP became aware of the discharge. Mr. Hill stated there was a high-flow alarm at their pump station. Mr. Hill stated Reading WWTP sent crews out to the pump station and observed black water along with a lot of foam in the flow. Mr. Hill added the crews immediately began an investigation and went out in the service area to determine the source of the discharge. Mr. Hill stated when a crew went to Reading Truck, they saw the discharge occur from a portable Frac tank to their sewer manhole. Mr. Hill stated the crew sampled water from the frac tank that was being discharged. Inspector Kline asked if there was any correspondence between Reading WWTP and Reading

Truck about this incident. Mr. Hill stated he drafted a letter to Ms. Susan Lackey, Corporate Director of EHS at Reading Truck, on January 18, 2023 (**See Attachment #8**). Mr. Hill added he sent a follow-up letter to Ms. Lackey on March 31, 2023 (**See Attachment #9**) concerning the incident. Mr. Hill described the incident as illegal and a violation of their permit. Mr. Hill added they created a bypass event and caused interference at the Reading WWTP. Inspector Kline asked Mr. Hill if Reading WWTP sent Reading Truck a notice of violation (NOV) for the incident. Mr. Hill stated that no NOV was sent, but believed they did fine them. Mr. Hill added they would have just sent them a bill. Upon further research, Mr. Hill stated Reading WWTP billed Reading Truck Body LLC \$4,300.00 for the entire incident.

Inspector Kline asked Mr. Hill if Reading WWTP has an Enforcement Response Plan (ERP) or similar document to address interference or bypass events caused by IUs. Mr. Hill stated they have a Civil Penalty Assessment Policy (**See Attachment #10**) and a Penalty Escalation Policy (**See Attachment #11**). Mr. Hill added these policies are also used for incidences of failure to report, and permit parameter exceedances, and other IU violations.

Inspector Kline asked Mr. Hill if any of the IUs had any permit parameter exceedances in the past three years. Mr. Hill stated he keeps track of all exceedances in his annual spreadsheets (**See Attachments #4 - #6**). Inspector Kline requested and received a copy of the IU Permit issued to Reading Truck Body, LLC (**See Attachment #12**). According to Mr. Hill, Reading Truck Body, LLC had the following violations:

Violation	Date
No reported value for Selenium	10/2022
Color	12/2022
Oil and Grease exceedance	12/2022
Zinc exceedance	12/2022
Bypass	12/2022
Interference	12/2022
Failure to Report	1/2021
Zinc exceedance	9/2021
Failure to Report	9/2021
Failure to Resample	9/2021

Inspector Kline also requested and received a copy of the IU Permit issued to Super Suds (**See Attachment #13**). Super Suds is a laundromat located at 701 North 8th Street in Reading. According to Mr. Hill, Super Suds had the following violations:

Violation	Date
Oil and Grease Exceedance	8/2023
Mercury, Lead and Zinc Exceedances	7/2023
Mercury, Lead and Zinc Exceedances	6/2023
Mercury, Lead and Zinc Exceedances	5/2023
Oil and Grease Exceedance	12/2022
Late Sampling	12/2022
Oil and Grease Exceedance	5/2022

Mercury and Zinc Exceedances	11/2021
Oil and Grease Exceedance	8/2021
Oil and Grease Exceedance	6/2021

Inspector Kline requested the copies of the most recent Inspection Reports for both Reading Truck and Super Suds. Mr. Hill stated that he had fallen behind on his IU Inspection Report writing. Mr. Hill stated that he conducted annual inspections at Reading Truck on May 10, 2022, November 30, 2021, and August 6, 2020, but had not actually had a chance to write those Inspection Reports. Inspector Kline asked when the last Inspection Report was written for Reading Truck. Mr. Hill stated that was May 17, 2019. Inspector Kline requested and received a copy of the May 17, 2019, Reading Truck Inspection Report (**See Attachment #14**). Mr. Hill stated that he conducted annual inspections at Super Suds on May 2, 2023, September 14, 2022, and November 1, 2021, but also did not have a chance to write those Inspection Reports either. Mr. Hill was not able to provide documentation of his last inspection of Super Suds. Inspector Kline completed the Field Checklist with input from Mr. Hill (**See Attachment #15- Checklist**).

As part of the PCI, Inspector Kline selected both Reading Truck Body, LLC and Super Suds for the IU tour portions of the inspection. Inspector Kline decided that Super Suds would be inspected on September 27, 2023, and Reading Truck would be inspected on September 28, 2023.

II. IU Inspection- Super Suds

A. Super Suds - Opening Conference

Inspector Kline and Mr. Hill arrived at Super Suds on September 27, 2023, at approximately 1:52 PM (**See Attachment #1- Photo #3**). Inspector Kline presented his credentials to Ms. Keila Lopez, Assistant Manager, at the outset of the inspection. Inspector Kline asked Ms. Lopez who is the Manager. Ms. Lopez stated the Manager was Lilliam Alvarez. Inspector Kline asked Ms. Lopez who was the owner of Super Suds. Ms. Lopez stated the owner was Mr. Robert Schwartz, Jr. who resides in Fredericksburg, Virginia. Inspector Kline asked Ms. Lopez to contact Mr. Schwartz. Ms. Lopez contacted Mr. Schwartz via telephone. Ms. Lopez then spoke with Ms. Jenny Jimenez, Director of Operations. Inspector Kline spoke with Ms. Jimenez over the telephone. Inspector Kline proceeded to conduct an Opening Conference. Attending were Mr. Hill, Ms. Lopez, and Ms. Jimenez (via speakerphone). During the Opening Conference, Inspector Kline informed both Ms. Lopez and Ms. Jimenez that any information they deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. Ms. Jimenez stated there wouldn’t be any CBI claims. Inspector Kline stated he would be taking photographs during the inspection. Ms. Jimenez stated photographs would not be a problem. Photographs are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Reading WWTP Pretreatment Program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Super Suds - Background Information

Inspector Kline asked Ms. Lopez to briefly describe operations at Super Suds. Ms. Lopez stated they have the coin-operated washing and drying machines, and they offer laundry drop-off services. According to Ms. Lopez there is no pretreatment for the laundromat. Mr. Hill agreed with Ms. Lopez's statement. Ms. Lopez stated operations are 7:00AM to 11:00PM seven days a week.

Inspector Kline asked if any sampling is conducted at Super Suds. Ms. Lopez stated yes, they are sampled once a quarter usually on Wednesday and Thursday. Mr. Hill stated Super Suds sends the results to him. Inspector Kline asked how long it takes the analytical report to reach Mr. Hill. Mr. Hill stated results are back in about two weeks.

C. Super Suds - Observations

Inspector Kline requested to tour the laundromat. Accompanying Inspector Kline on the tour were: Ms. Lopez and Mr. Hill.

Observation #1: The first area visited was the Utility Room. Inspector Kline did not observe any pretreatment systems inside this room.

Observation #2: Inspector Kline observed two separate access areas for common piping coming off the washing machines. The first access was locked (**See Attachment #1- Photo #4**). Ms. Lopez opened the access door. Inspector Kline observed a common open drain with an in-place strainer-type debris screen (**See Attachment #1- Photo #5**).

Observation #3: Inspector Kline observed a second locked access area (**See Attachment #1- Photo #6**). Ms. Lopez opened the access door. Inspector Kline observed a common open drain. This drain and piping did not appear to have any debris screen installed (**See Attachment #1- Photo #7**).

Observation #4: Inspector Kline observed the permitted effluent sample location, which is located indoor, along the main aisle heading towards the entrance on North 8th Street (**See Attachment #1- Photos #8 & #9**).

This concluded the physical inspection portion of Super Suds. Inspector Kline and Mr. Hill left the laundromat at approximately 4:00PM.

III. IU Inspection- Reading Truck Body, LLC.

A. Reading Truck Body, LLC. - Opening Conference

Inspector Kline and Mr. Hill arrived at Reading Truck Body, LLC (Reading Truck) (**See Attachment #1- Photos #10 & #11**) on September 28, 2023, at approximately 8:30AM. Inspector Kline presented his credentials

to Mr. Bobby Minnick, Corporate Environmental Manager, Mr. Robert George, Safety Manager, and Mr. Troy Toalbo, Corporate Facility Manager, at the outset of the inspection. Inspector Kline conducted an Opening Conference. Ms. Susan Lackey, Corporate Environmental Health and Safety Manager was not initially present during the beginning of the Opening Conference but would join the remaining portion of the conference. During the Opening Conference, Inspector Kline informed all Reading Truck Representatives that any information that they deemed to be confidential business information (“CBI”) should be identified to Inspector Kline during the inspection and it would be handled as CBI according to EPA’s CBI procedures. During the inspection, the Reading Truck Representatives did not identify any CBI. Photographs were taken during the inspection by Inspector Kline and are provided in Attachment #1.

Inspector Kline explained that the purpose of the inspection was to observe the Reading WWTP Pretreatment Program’s compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The inspection was conducted as part of a routine periodic inspection.

B. Reading Truck Body, LLC. - Background Information

Inspector Kline asked Mr. Minnick, Mr. George, and Mr. Toalbo to provide a brief historical description of their facility and what Reading Truck Body does at this location. Mr. Minnick first stated that he was in his current position for approximately one year. Mr. Toalbo added he has been the Corporate Facility Manager for two months but has been with Reading Truck for seven years. According to Mr. Minnick, the facility dates to 1955 as Reading Body Works and has been making utility truck bodies here ever since. Mr. Minnick added that in 2015, J. B. Poindexter and Company acquired Reading Truck Body and is the current owner.

Inspector Kline asked, in addition to the IU Permit issued by Reading WWTP, whether Reading Truck Body has other permits or generates hazardous wastes. Mr. Minnick stated they have a Synthetic Minor Air Permit and a Stormwater Permit both issued by the PADEP. Mr. Minnick added Reading Truck Body is a Small Quantity Generator of hazardous wastes. Mr. Minnick stated there are no other permits issued at this location.

Inspector Kline asked how many employees are at this location. Mr. Toalbo stated there are approximately 530 full-time employees at this location. Mr. Toalbo added they do have a second manufacturing location in Claremore, Oklahoma along with 22 “upfit” locations across the USA. According to Mr. Toalbo, upfit locations are designated shops where the utility bodies are installed on vehicle chassis. Inspector Kline asked what Reading Truck Body operating hours are. Mr. Toalbo stated there are two production shifts five days a week Monday through Friday. Mr. Toalbo added there are reduced support operations on the weekends.

Inspector Kline asked Mr. Minnick to describe the operations at Reading Truck Body. Mr. Toalbo stated approximately 97% of the painting operations are powder coat (dry paint) with very few wet paint operations. Mr. Minnick stated Reading Truck Body has six major areas of operation. Mr. Minnick described the areas of operation:

1. Receiving- most raw materials are delivered to the “Steel Pit” which is underroof storage of flat and or rolled aluminum and steel.
2. Fabrication- individual parts are made by either cutting, bending, or punching.
3. Standard Line Assembly
4. Special Line Assembly
5. Finishing Department- install lights, door latching, painting and Quality Assurance and Quality Control
6. Shipping

Ms. Lackey provided Inspector Kline with a copy of their industrial wastewater flow diagram (**See Attachment #16**). Ms. Lackey stated sodium hydroxide is added to the equalization tank and the pH is then adjusted. Solids are settled out and removed using a filter press. Prior to discharge, effluent water is sampled at the sampling point inside the wastewater treatment area. Ms. Lackey stated Mr. Tom Ditzel is their facility wastewater operator and has overseen that area for seven years. Ms. Lackey added wastewater does not operate on Fridays.

Inspector Kline asked who conducts the sample collection and analytical analysis of the wastewater effluent. Ms. Lackey stated Mr. Ditzel samples the wastewater for quality. Inspector Kline asked if Reading Truck has an in-house lab. Ms. Lackey stated no, the quality samples are bench-type tests, mainly for pH. Ms. Lackey stated M. J. Reider does monthly sample analysis, and they are located only about a quarter of a mile from them. Inspector Kline asked how long it takes the lab to return the analytical report. Ms. Lackey stated the lab reports are back to them within seven to ten days. Ms. Lackey stated Mr. Hill receives both an electronic and paper copy of all analytical reports.

Inspector Kline asked Ms. Lackey to describe the incident that occurred in December 2022 involving Reading Truck Body discharging wastewater from a portable frac tank to a Reading City sewer manhole. Ms. Lackey stated it was decided, in order to prevent a ten-day maintenance shut-down, that two of their “e-coat” tanks would be cleaned out. Inspector Kline asked Ms. Lackey what was in the e-coat tanks. Ms. Lackey stated dilute zirconium oxide solution along with cleaning solution splash and overflow. Ms. Lackey stated the e-coat tanks are normally used to store latex primer from Sherwin Williams. Ms. Lackey further stated to clean out the tanks, three portable frac tanks were hauled in and were used. Ms. Lackey stated wastewater was pumped into the first frac tank and batch treated within that tank and then pumped into the second and third frac tanks and was discharged to the city sewer manhole. Ms. Lackey did state while discharging to the sewer manhole they did encounter a foaming issue. Inspector Kline asked Ms. Lackey and Mr. Minnick if any advanced notification was made to the Reading WWTP prior to the discharge to the sewer manhole. Ms. Lackey stated she was not certain if notification was made. Mr. Minnick stated they would have to check their accounts to see if an electronic notification was made to the Reading WWTP. As of the date in preparing this report, Inspector Kline had not received any information from any Reading Truck Body employee that a notification to the Reading WWTP had occurred. Inspector Kline asked both Ms. Lackey and Mr. Minnick if there were any samples collected along with sample analysis of the wastewater in the frac tanks prior to being discharged to the sewer manhole. Ms. Lackey stated M.J. Reider did not do any sampling or testing of water discharged to the sewer manhole.

Inspector Kline stated according to the Reading WWTP, there was a violation at Reading Truck in January 2021 for failure to report. Inspector Kline asked Ms. Lackey if she could explain what had happened. Ms. Lackey stated they “just missed it.”

C. Reading Truck Body, LLC. - Observations

Inspector Kline requested to tour Reading Truck Body. Accompanying Inspector Kline on the tour were: Mr. Hill, Mr. George, Mr. Minnick, Mr. Toalbo and Ms. Lackey.

Observation #1: Inspector Kline observed the maintenance area. Inspector Kline observed three opened cardboard boxes that had universal waste labels on each box. The boxes contained used waste fluorescent bulbs and waste LED bulbs. Inspector Kline did not observe anyone actively adding to or removing bulbs while in the maintenance area.

Observation #2: Inspector Kline toured the outside fabrication overhead area. This area appeared to be somewhat crowded. Mr. Minnick stated there really was not much remaining outdoor storage space and there really wasn't much if any room for expansion.

Observation #3: Inspector Kline observed the Special Assembly and Special Finishing Areas. Inspector Kline observed active production in both areas and four tanks used for cleaning and undercoating.

Observation #4: Inspector Kline observed the Standard Assembly and Standard Finishing Areas. Inspector Kline observed an area of the floor behind tank #6 where there appeared to be staining and an active leak (**See Attachment #1- Photo #12**). There was a floor drain in the same general area that appeared to have staining as well (**See Attachment #1- Photo #13**). Mr. Minnick stated the floor drain was plugged. Inspector Kline asked if there was a work request to have the leak repaired. Mr. Minnick introduced Inspector Kline to Mr. Eric Snoke, E-coat Technician. Mr. Snoke stated the leak and floor staining is permeate coming from a leak in the paint system located above on the mezzanine. Mr. Snoke stated a work request was created and repair parts were on order. Inspector Kline did not observe anyone actively attempt to clean up the area during the inspection.

Observation #5: Inspector Kline toured the area outside Dock Door #7. Mr. George called this the Standard Finishing Driveway. Inspector Kline observed ten 55-gallon drums placed on wooden skids. Four of the drums were open or had loose lids (**See Attachment #1- Photo #14**). Ms. Lackey stated she believed the drums to be old coatings drums. Inspector Kline requested to observe the contents of one of the open drums (**See Attachment #1- Photo #15**). The drum appeared to be lined and approximately two-thirds full of liquid and settleable solids. Inspector Kline asked if the drums were a waste and why were they left in this area. Ms. Lackey stated she didn't know why the drums were there and that they would be immediately addressed. Inspector Kline observed two above-ground storage tanks in the same general area. Ms. Lackey stated those were "DI" tanks and were no longer in-use.

Observation #6: Inspector Kline toured the wastewater treatment area. Inspector Kline observed the pH meter calibration buffer solutions to all be in effect with August 2024 expirations dates.

Observation #7: Inspector Kline observed the sampling tank. There appeared to be an 8-inch PVC riser located within the sampling tank. Ms. Lackey stated this is where the effluent samples are collected. Mr. Hill verified that this is the permitted effluent sampling location (**See Attachment #1- Photo #16**).

Observation #8: Inspector Kline observed the piping leaving the sampling tank which flows to the Reading WWTP (**See Attachment #1- Photo #17**).

This concluded the physical inspection portion of Reading Truck. Inspector Kline left the facility at approximately 2:00PM.

IV. Closing Conferences

After the inspections of Super Suds and Reading Truck Body, Inspector Kline conducted individual closing conferences at each facility. Attending the closing conference at Super Suds were Ms. Lopez and Mr. Hill. Attending the closing conference at Reading Truck Body were Mr. Minnick, Mr. George, Mr. Toalbo, Ms. Lackey and Mr. Hill. Inspector Kline shared preliminary observations about each facility. Inspector Kline reiterated that all preliminary observations discussed were not compliance determinations. 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.

Inspector Kline conducted a closing conference with Mr. Hill at the close of the Reading WWTP- Industrial Pretreatment Program File and briefly following the Reading Truck Body inspection. This concluded the PCI.

V. List of Attachments

- Attachment 1.** Photographs
- Attachment 2.** NPDES Permit
- Attachment 3.** 2022 Annual Report
- Attachment 4.** 2023 Spreadsheet
- Attachment 5.** 2022 Spreadsheet
- Attachment 6.** 2021 Spreadsheet
- Attachment 7.** IU Application
- Attachment 8.** 1/18/23 Letter to Reading Truck
- Attachment 9.** 3/31/23 Letter to Reading Truck
- Attachment 10.** Civil Penalty Assessment Policy
- Attachment 11.** Penalty Escalation Policy
- Attachment 12.** Reading Truck- IU Permit
- Attachment 13.** Super Suds- IU Permit
- Attachment 14.** Reading Truck- Inspection Report
- Attachment 15.** Checklist
- Attachment 16.** Reading Truck- WW Flow diagram