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

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	07/14/2022
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Pretreatment – Publicly Owned Treatment Works Inspection
Facility Name:	Hanover Borough Wastewater Treatment Plant (WWTP)
Permittee(s):	Hanover Borough
Facility Operator:	Hanover Borough
Facility Address:	44 Frederick Street, Hanover, PA 17331
Lat/Long:	39.799953/-76.98407
County/Parish:	York
Permit Number:	PA0026875
NAICS & SIC Codes:	221320/4952
Unique Project #:	3E22WN009A

Facility Representative(s): **Point of Contact**

Alan Redding – Lead Operator ☒

Phone: (717) 637-4112 Email: aredding@hanoverboroughpa.gov

EPA Inspectors:

Aaron Thomson (3ED13)

Phone: 215-814-2116 Email: Thomson.aaron@epa.gov

AARON THOMSON Digitally signed by AARON THOMSON Date: 2022.09.09 10:17:10 -04'00'

Report Preparer Signature/Date
Aaron Thomson (3ED13) Date
Four Penn Center - Philadelphia, PA 19103

ZELMA MALDONADO Digitally signed by ZELMA MALDONADO Date: 2022.09.09 11:44:13 -04'00'

Supervisor Signature/Date
Zelma Maldonado, Acting Chief, ES Section Date
Four Penn Center - Philadelphia, PA 19103

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I. Introduction

On July 14, 2022, staff from the U.S. Environmental Protection Agency ("EPA") Region III (hereinafter, "EPA Inspection Team") conducted an on-site inspection of the Hanover Borough publicly owned treatment works (POTW) facility's (hereinafter, "the facility") pretreatment program. The purpose of the inspection was to observe the program's compliance with the Clean Water Act (CWA) and the applicable Federal Pretreatment Regulations. The facility's National Pollutant Discharge Elimination System (NPDES) permit (ID: PA0026875) has been included as **Attachment 1**. The inspection was conducted as part of a routine periodic inspection.

A. Inspection Opening Conference

EPA Inspector Aaron Thomson (Inspector Thomson) began the inspection of the facility at est. 11:00 AM. Inspector met with the following facility representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Aaron Thomson	EPA	215-814-2116	Thomson.aaron@epa.gov
Site/Facility Representatives			
Alan Redding	Hanover Borough	(717) 637-4112	aredding@hanoverboroughpa.gov
Tony Thomas	Hanover Borough	(717) 637-4112	tthomas@hanoverboroughpa.gov

Inspector Thomson displayed their credentials to Mr. Redding at the outset of the inspection, and explained the purpose of the inspection was to observe compliance with the Federal Pretreatment Regulations. The EPA Inspector informed Mr. Redding that any information that the Facility deemed to be confidential business information ("CBI") should be identified to EPA during the inspection and it would be handled as CBI according to EPA's CBI procedures. Photographs were taken during the inspection by Inspector Thomson, and are provided in **Attachment 2**. Not all photographs taken during the inspection were included in this report.

II. Facility Activity/Walkthrough

The facility is a wastewater treatment plant, owned and operated by the Borough of Hanover, which has a hydraulic capacity of 7.28 million gallons per day and serves most of the Borough of Hanover, all of the Borough of McSherrystown and all of Conewago Township.

According to Mr. Redding, the facility previously had a pretreatment officer, however the current Superintendent, Tim Mayer, is currently also acting as the pretreatment coordinator. Mr. Redding stated the Borough of Hanover is in the process of potentially hiring a new pretreatment coordinator. Currently, operators (such as Mr. Redding) conduct inspections of their permitted industrial users (IUs). The facility is operated seven days a week, with shifts from 7:00 am to 3:00 pm, manned by a crew of eleven. The facility utilizes a Scada alarm system, that operates and monitors continuously, to alert the crew should some failure occur during the periods that the plant is not manned. All plant processes are monitored by plant personnel. Samples of the flow are taken at each step in the plant. Process control analyses are done in the facility's laboratory, while all parameters reported to regulatory agencies are performed by an accredited commercial laboratory. The facility typically uses Labs Inc. out of New Oxford, PA for their sample analyses with a turn-around time of 2 weeks.

Mr. Redding stated that the facility uses a third party, Gannett Fleming, to aid in their permit writing and to help prepare the facility's annual regulatory reports.

The facility has five permitted industrial users, including four categorical industrial users (CIU) and one significant non-categorical user (SNIU). The four CIUs include Emeco Industries, Inc.; IWM International; McClarin Plastics, Inc.; R.H. Sheppard Company, INC; and the one SNIU is Utz Quality Foods, Inc. (Utz).

As part of the inspection, a tour of both the facility's treatment plant and Utz, an IU of the facility, were led by Mr. Redding at Inspector Thomson's request. During the tour of the facility, Inspector Thomson observed both influent and effluent sampling points, including composite samplers with thermometers reading four degrees Celsius (**Attachment 2 Photographs 1-4**). During the tour of Utz, Mr. Redding led an inspection of Utz with Inspector Thomson, including a tour of the processes contributing to the wastewater discharge, a tour of the pretreatment process and a visit to Utz's effluent sampling point (**Attachment 2 Photograph 5)**. While at Utz's effluent sampling point, Mr. Redding described how a sampling event would occur, concluding the tour of Utz.

II.Observations

A checklist was utilized during the review and is provided below. The checklist is divided into sections, with Observations listed under each section.

Visual Observations pertaining to each section are listed at the end of each section.

Section 1.					
Background. (to be filled out before inspection)					
Where stream/river/tributary does the POTW discharge to?	South Branch Conewago Creek/Plum Creek				
As required by the approved program, list the frequency for:	**CIUs**		**SNIUs**		**Comments**
POTW Sampling of IUs	6		6		**Attachment 3**
POTW Inspection of IUs	1		1		**Attachment 3**
IU self-monitoring	4		4		**Attachment 3**
IU reporting	4		4		**Attachment 3**
In the last calendar year, indicate frequency of:					
POTW sampling of IUs	13		6+		
POTW Inspection of IUs	1		1		**Attached Inspections**
If less than required by the approved program or less than 1/yr [403.8(f)(2)(v)], explain:					
List all the SIUs that were found to have not been sampled or not inspected at the last PCI or annual report. Indicate if they are NS (not sampled), NI (not inspected), or B (both not inspected and not sampled)					
	Yes	**No**	**N/A**	**Comments**	
Does the annual report indicate any new CIUs?	☐	☒	☐		
List all visual observations pertaining to this section	According to Mr. Redding, the information listed on **page 2 of Attachment 3** under “compliance monitoring in 2016” is not for 2016, but rather for the previous 12 months – Emeco and McClarin Plastics were not monitored in q4 2021, due to shutdown of operations due to covid				

Section 2.				
POTW sampling and inspection				
List the SIUs that were either not sampled or not inspected in the last 12 months [.403.8(f)(2)(v)] Indicate if they are NS (not sampled), NI (not inspected), or B (both not inspected and not sampled).				
	Yes	**No**	**N/A**	**Comments**
Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample? List the number of grab samples	☒	☐	☐	1/parameter (stated by Mr. Redding)
Are composite samples used for all other pollutants to evaluate compliance with:				
Categorical Standards?	☒	☐	☐	

Local Limits?	☒	☐	☐	
Is any unannounced sampling conducted?	☐	☒	☐	
Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?	☒	☐	☐	
How much time normally elapses between sample collection and obtaining analytical results?	2 weeks			
Does the POTW use QA/QC procedures such as:				
Use of calibration and maintenance plan for sampling equipment?	☒	☐	☐	
Training for sampler?	☒	☐	☐	
Split Samples (field)?	☒	☐	☐	
Training for analyst?	☒	☐	☐	
Duplicate Samples (laboratory)?	☒	☐	☐	
Method Blanks (laboratory)?	☒	☐	☐	
Spiked Samples (laboratory)?	☒	☐	☐	
List all visual observations pertaining to this section	in-house analyses are not used for regulatory reporting, only for internal monitoring. Labs Inc. is used for analyses when regulatory reporting			

Section 3.				
IU Self-Monitoring and Reporting				
As currently conducted, list frequency for:	**CIUs**	**SNIUs**		**Comments**
IU Self-Monitoring	4+	21		Emeco 5 events, IWM 10 events (**Attachment 3**)
IU reporting	4+	21		Emeco 5 reports, IWM 10 reports (**Attachment 3**)
If less than required by the approved program, explain				
	Yes	**No**	**N/A**	**Comments**
If IUs sample more frequently than required, do they report all sampling results to the POTW [403.12(g)(5)]?	☒	☐	☐	
List all new sources IUs:	n/a			
Have the following been received by all IUs which became new sources in the last 12 months (403.12))?				
Baseline Monitoring Reports	☒	☐	☐	
Compliance Schedule Milestone Reports	☒	☐	☐	

90-day Final Compliance Reports	☒	☐	☐	
How does POTW verify the information in these reports				
Do any IUs discharge hazardous waste?	☐	☒	☐	
If no, how does the POTW verify this?	Inspecting IU/Sampling IU/sampling influent			
If yes, has the IU submitted the notifications?				
List all visual observations pertaining to this section				

Section 4.	
IU File Evaluation	
List IUs below:	
IU Name	Utz Quality Food, Inc.
Category (SNIU/CIU)	SNIU
Regulated parameters (include categorical standards & local limits)	Not explicitly provided, prohibited discharge standards/local limits provided in **Attachment 6**
Address	861 Carlisle Street, Hanover, PA 17331
Description of IU manufacturing/pretreatment processes	Food Processing
IU Name	Emeco Industries, Inc.
Category (SNIU/CIU)	CIU (40 CFR 433)
Regulated parameters (include categorical standards & local limits)	Not explicitly provided, prohibited discharge standards/local limits provided in **Attachment 6**
Address	850 Elm Avenue, Hanover, PA 17331
Description of IU manufacturing/pretreatment processes	Metal finishing/recycled material processing (recycled metals/wood into furniture)
IU Name	IWM International
Category (SNIU/CIU)	CIU (40 CFR 433)
Regulated parameters (include categorical standards & local limits)	Not explicitly provided, prohibited discharge standards/local limits provided in **Attachment 6**
Address	East Middle Street, Hanover, PA 17331
Description of IU manufacturing/pretreatment processes	Wire mesh production
IU Name	McClarin Plastics, Inc.
Category (SNIU/CIU)	CIU (40 CFR 433)
Regulated parameters (include categorical standards & local limits)	Not explicitly provided, prohibited discharge standards/local limits provided in **Attachment 6**
Address	60 Filbert Street, PA 17331
Description of IU manufacturing/pretreatment processes	Thermoplastic/fiberglass reinforced plastic

IU Name	R.H. Sheppard Company, Inc.
Category (SNIU/CIU)	CIU (40 CFR 433)
Regulated parameters (include categorical standards & local limits)	Not explicitly provided, prohibited discharge standards/local limits provided in **Attachment 6**
Address	101 Philadelphia Street, Hanover PA 17331
Description of IU manufacturing/pretreatment processes	Manufacturer of steering systems/engine pumps

Section 5.a				
File Review Checklist				
IU Name:	Utz			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	SNIU			
	Yes	**No**	**N/A**	**Comments**
Is the IU categorized?	☒	☐	☐	Self-identified in industrial survey (**Attachment 7** is an example of an industrial survey, survey for Utz not provided) and confirmed by facility via sampling
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	**Attachment 27**			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	**Attachment 7**
a current control mechanism	☐	☐	☒	**Attachment 27 (8/1/2022-7/31/2023)**
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	**Attachment 6**
Were local limits and/or categorical standards applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	
If applicable, were TTO requirements or alternatives correctly applied?	☐	☐	☒	
In the inspector's opinion, is the sample frequency sufficient to determine compliance?	☐	☐	☐	
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	**27 pg 9**

sample type?	☒	☐	☐	**27 pg 9**
Is the permit effective for 5 years or less?	☒	☐	☐	**Attachment 27 (8/1/2022-7/31/2023)**
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	1 (12/14/2021)			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	**Attachment 5** page 1
Inspection date/time	☒	☐	☐	**5** page 1
Name of IU official contacted.	☒	☐	☐	**5** page 1
Review of manufacturing facilities	☒	☐	☐	**5** page 2
Verification of production data if needed	☒	☐	☐	**5** page 2
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	**5** page 2
Condition of pretreatment facilities	☒	☐	☐	**5** page 4
Evaluation of chemical storage areas	☒	☐	☐	**5** page 4
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	**5** page 3
Evaluation of spill/slug control procedures	☒	☐	☐	**5** page 3
Evaluation of housekeeping practices	☒	☐	☐	**5** page 2
Evaluation of potential for hazardous waste discharge	☒	☐	☐	**5** page 3, #7
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	**5** page 5
Evaluation of lab procedures	☐	☐	☒	Contractor, **5** page 5, A, #5
Evaluation of monitoring records	☐	☐	☐	**5** page 5
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	**4 (Attachment 12)**			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	Chain of Custody (CoC) (**Attachment 12**)
sample date/time	☒	☐	☐	CoC
sample type	☒	☐	☐	CoC
sample location	☒	☐	☐	CoC
wastewater flow during sampling	☐	☒	☐	
sample preservation	☒	☐	☐	CoC
chain of custody	☒	☐	☐	CoC
analytical methods used	☒	☐	☐	**Attachment 12**
analysis date	☒	☐	☐	Sample Doc Page 2 (**Attachment 12 Pages 2, 6, 9, 13, 17**)

name of analyst	☒	☐	☐	**Attachment 12**
all analytical data	☒	☐	☐	**Attachment 12**
Were all the regulated parameters monitored?	☒	☐	☐	**Attachment 12**
Were 40 CFR 136 analytical methods used?	☒	☐	☐	**Attachment 12**
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	**Attachment 3**
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	**Attachment 3**
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☐	☒	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	**Attachment 8**
When was the plan last updated?				
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	**8** page 2, III
Description of stored chemicals	☐	☐	☒	non-categorical, food processor
Procedure to prevent slugs/spills	☒	☐	☐	**8** page 3, V
Procedure to notify POTW of slugs/spills	☒	☐	☐	**8** page 2, IV
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	**8** page 3, VI
List all visual observations pertaining to this section				

Section 5.b				
File Review Checklist				
IU Name:	Emeco Industries, Inc.			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	**No**	**N/A**	**Comments**
Is the IU categorized?	☒	☐	☐	Self-identified in industrial survey (**Attachment 7** is an example of an industrial survey, survey for Emeco not provided) and confirmed by facility via sampling
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	**Attachment 13**			

an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	**Attachment 7**
a current control mechanism	☒	☐	☐	**Attachment 13** July 1, 2021- June 30, 2022
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	**Attachment 6**
Were local limits and/or categorical standards applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	
If applicable, were TTO requirements or alternatives correctly applied?	☒	☐	☐	"Permittee does not have an approved toxic organic management plan (TOMP) in place as defined in 40 CFR 433.12 The Borough of Hanover will complete sampling for the TTO's once every six (6) months. This will meet EPA's requirement in lieu of industry sampling every six (6) months" **Attachment 13**
In the inspector's opinion, is the sample frequency sufficient to determine compliance?	☐	☐	☐	
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	**Attachment 13 Page 6**
sample type?	☒	☐	☐	**Attachment 13 Page 6**
Is the permit effective for 5 years or less?	☒	☐	☐	**Attachment 13** July 1, 2021- June 30, 2022
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	1 (12/13/2021)			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	**Attachment 14 page 1**
Inspection date/time	☒	☐	☐	**14 page 1**
Name of IU official contacted.	☒	☐	☐	**14 page 1**
Review of manufacturing facilities	☒	☐	☐	**14 page 2**
Verification of production data if needed	☒	☐	☐	**14 page 2**
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	**14 page 2**

Condition of pretreatment facilities	☒	☐	☐	**14 page 4**
Evaluation of chemical storage areas	☒	☐	☐	**14 page 4**
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	**14 page 3**
Evaluation of spill/slug control procedures	☒	☐	☐	**14 page 3**
Evaluation of housekeeping practices	☒	☐	☐	**14 page 2**
Evaluation of potential for hazardous waste discharge	☒	☐	☐	**14 page 3, #7**
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	**14 page 5**
Evaluation of lab procedures	☐	☐	☒	Contractor, **5 page 5, A, #5**
Evaluation of monitoring records	☐	☐	☐	**5 page 5**
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	6 events **- Attachment 3**			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	**Attachment 17/18** CoC
sample date/time	☒	☐	☐	**17/18** CoC
sample type	☒	☐	☐	**17/18** CoC
sample location	☒	☐	☐	**17/18** CoC
wastewater flow during sampling	☐	☒	☐	
sample preservation	☒	☐	☐	**17/18** CoC
chain of custody	☒	☐	☐	**17/18** CoC
analytical methods used	☒	☐	☐	**17/18** analysis page
analysis date	☒	☐	☐	**17/18** analysis page
name of analyst	☒	☐	☐	**17/18** analysis page
all analytical data	☒	☐	☐	**17/18** analysis page
Were all the regulated parameters monitored?	☒	☐	☐	**17/18** analysis page
Were 40 CFR 136 analytical methods used?	☒	☐	☐	**17/18** analysis page
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	**Attachment 3**
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☐	☒	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	**Attachment 29**
When was the plan last updated?	Dec 13, 2021			
Does the slug/spill plan contain:				
Description of discharge practices	☐	☒	☐	

Description of stored chemicals	☒	☐	☐	**29 pg 10**
Procedure to prevent slugs/spills	☒	☐	☐	**29 pg 3**
Procedure to notify POTW of slugs/spills	☒	☐	☐	**29 pg 7 "if a spill has occurred, the following people need to be notified" – number listed on page 2**
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	**27 pg 4**
List all visual observations pertaining to this section				

Section 5.c				
File Review Checklist				
IU Name:	IWM International			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	**No**	**N/A**	**Comments**
Is the IU categorized?	☒	☐	☐	Self-identified in industrial survey (**Attachment 7** is an example of an industrial survey, survey for Utz not provided) and confirmed by facility via sampling
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	**Attachment 19**			
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	**Attachment 7**
a current control mechanism	☒	☐	☐	**Attachment 19** October 1, 2021 – September 30, 2022
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	**Attachment 6**
Were local limits and/or categorical standards applied?	☒	☐	☐	**Attachment 19**
If applicable, were production-based standards correctly applied?	☐	☐	☒	
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	
If applicable, were TTO requirements or alternatives correctly applied?	☒	☐	☐	**Attachment 19**
In the inspector's opinion, is the sample frequency sufficient to determine compliance?	☐	☐	☐	

Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	**19 pg 6**
sample type?	☒	☐	☐	**19 pg 6**
Is the permit effective for 5 years or less?	☒	☐	☐	**Attachment 19** October 1, 2021 – September 30, 2022
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	1 (12/14/2021)			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	**Attachment 20 page 1**
Inspection date/time	☒	☐	☐	**20 page 1**
Name of IU official contacted.	☒	☐	☐	**20 page 1**
Review of manufacturing facilities	☒	☐	☐	**20 page 2**
Verification of production data if needed	☒	☐	☐	**20 page 2**
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	**20 page 2**
Condition of pretreatment facilities	☒	☐	☐	**20 page 4**
Evaluation of chemical storage areas	☒	☐	☐	**20 page 4**
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	**20 page 3**
Evaluation of spill/slug control procedures	☒	☐	☐	**20 page 3**
Evaluation of housekeeping practices	☒	☐	☐	**20 page 2**
Evaluation of potential for hazardous waste discharge	☒	☐	☐	**20 page 3, #7**
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	**20 page 5**
Evaluation of lab procedures	☐	☐	☒	Contractor, **20 page 5, A, #5**
Evaluation of monitoring records	☐	☐	☐	**20 page 5**
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	9 – **Attachment 3**			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	Attachment **35/36** CoC
sample date/time	☒	☐	☐	**35/36** CoC
sample type	☒	☐	☐	**35/36** CoC
sample location	☒	☐	☐	**35/36** CoC
wastewater flow during sampling	☐	☒	☐	
sample preservation	☒	☐	☐	**35/36** CoC
chain of custody	☒	☐	☐	**35/36** CoC
analytical methods used	☒	☐	☐	**35/36** analysis page

analysis date	☒	☐	☐	**35/36** analysis page
name of analyst	☒	☐	☐	**35/36** analysis page
all analytical data	☒	☐	☐	**35/36** analysis page
Were all the regulated parameters monitored?	☒	☐	☐	**35/36** analysis page
Were 40 CFR 136 analytical methods used?	☒	☐	☐	**35/36** analysis page
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	**Attachment 3**
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☐	☒	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	**Attachment 28**
When was the plan last updated?				
Does the slug/spill plan contain:				
Description of discharge practices	☒	☐	☐	**28 section 3.2**
Description of stored chemicals	☒	☐	☐	**28 section 4**
Procedure to prevent slugs/spills	☒	☐	☐	**28 section 2.3/6.1/6.2/9**
Procedure to notify POTW of slugs/spills	☒	☐	☐	**28 section 1.3/1.5/1.6/1.7**
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	**28 section 6.3**
List all visual observations pertaining to this section				

Section 5.d				
File Review Checklist				
IU Name:	McClarin Plastics, Inc.			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	**No**	**N/A**	**Comments**
Is the IU categorized?	☒	☐	☐	Self-identified in industrial survey (**Attachment 7** is an example of an industrial survey, survey for Utz not provided) and confirmed by facility via sampling
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.	**Attachment 21**			

an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	**Attachment 7**
a current control mechanism	☒	☐	☐	**Attachment 21** August 1, 2021 – July 31, 2022
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	**Attachment 6**
Were local limits and/or categorical standards applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	
If applicable, were TTO requirements or alternatives correctly applied?	☒	☐	☐	**Attachment 21**
In the inspector's opinion, is the sample frequency sufficient to determine compliance?	☐	☐	☐	
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	**21 pg 6**
sample type?	☒	☐	☐	**21 pg 6**
Is the permit effective for 5 years or less?	☒	☐	☐	**Attachment 21** August 1, 2021 – July 31, 2022
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	1 (12/13/2021)			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	**Attachment 22** page 1
Inspection date/time	☒	☐	☐	**5** page 1
Name of IU official contacted.	☒	☐	☐	**5** page 1
Review of manufacturing facilities	☒	☐	☐	**5** page 2
Verification of production data if needed	☒	☐	☐	**5** page 2
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	**22 page 2**
Condition of pretreatment facilities	☒	☐	☐	**22 page 4**
Evaluation of chemical storage areas	☒	☐	☐	**22 page 3**
Evaluation of need for spill/slug control plan at least every 2 years	☒	☐	☐	**22 page 3**
Evaluation of spill/slug control procedures	☒	☐	☐	**22 page 3**
Evaluation of housekeeping practices	☒	☐	☐	**22 page 2**
Evaluation of potential for hazardous waste discharge	☒	☐	☐	**22 page 3, #7**
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	**22 page 5**
Evaluation of lab procedures	☐	☐	☒	Contractor, **5 page 5, A, #5**

Evaluation of monitoring records	☐	☐	☐	**5 page 5**
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	6 – **Attachment 3**			
Does the sampling documentation include:				
Name of the sampling personnel	☒	☐	☐	**Attachment 37/38** CoC
sample date/time	☒	☐	☐	**37/38** CoC
sample type	☒	☐	☐	**37/38** CoC
sample location	☒	☐	☐	**37/38** CoC
wastewater flow during sampling	☐	☐	☒	
sample preservation	☒	☐	☐	**37/38** CoC
chain of custody	☒	☐	☐	**37/38** CoC
analytical methods used	☒	☐	☐	**37/38** analysis page
analysis date	☒	☐	☐	**37/38** analysis page
name of analyst	☒	☐	☐	**37/38** analysis page
all analytical data	☒	☐	☐	**37/38** analysis page
Were all the regulated parameters monitored?	☒	☐	☐	**37/38** analysis page
Were 40 CFR 136 analytical methods used?	☒	☐	☐	**37/38** analysis page
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☐	☒	☐	
Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	**Attachment 23 pg 8**
When was the plan last updated?	7/18/22			
Does the slug/spill plan contain:				
Description of discharge practices	☐	☒	☐	
Description of stored chemicals	☐	☒	☐	
Procedure to prevent slugs/spills	☐	☒	☐	
Procedure to notify POTW of slugs/spills	☒	☐	☐	**23 pg 8** (contact info on page 2)
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	**23 pg 8**
List all visual observations pertaining to this section	Does not include all information required in spill plan			

Section 5.e

File Review Checklist				
IU Name:	R.H. Sheppard Company, Inc.			
Is the IU categorical (CIU), significant non-categorical (SNIU), or other (O)?	CIU			
	Yes	**No**	**N/A**	**Comments**
Is the IU categorized?	☒	☐	☐	Self-identified in industrial survey (**Attachment 7** is an example of an industrial survey, survey for Utz not provided) and confirmed by facility via sampling
Control Mechanism				
List if the file contains the following:				
Does the file contain regulatory items? List each, including IU permits, local limits, etc.				
an updated control mechanism application and/or survey questionnaire?	☒	☐	☐	**Attachment 7**
a current control mechanism	☐	☐	☒	**Attachment 23** August 1, 2021 – July 31 2022
documentation of how control mechanism limits and requirements were established.	☒	☐	☐	**Attachment 6**
Were local limits and/or categorical standards applied?	☒	☐	☐	
If applicable, were production-based standards correctly applied?	☐	☐	☒	
If applicable, was the combined waste stream formula correctly applied?	☐	☐	☒	
If applicable, were TTO requirements or alternatives correctly applied?	☒	☐	☐	
In the inspector's opinion, is the sample frequency sufficient to determine compliance?	☐	☐	☐	
Does the control mechanism include the following:				
sampling location and frequency?	☒	☐	☐	**23 pg 6**
sample type?	☒	☐	☐	**23 pg 6**
Is the permit effective for 5 years or less?	☒	☐	☐	**Attachment 23** August 1, 2021 – July 31 2022
POTW Inspections of IUs				
How many POTW inspections were conducted and documented in the last 12 months?	1 (12/17/2021)			
Does the inspection report include the following information:				
Inspector name	☒	☐	☐	**Attachment 25 page 1**
Inspection date/time	☒	☐	☐	**25 page 1**

Name of IU official contacted.	☒	☐	☐	**25 page 1**
Review of manufacturing facilities	☒	☐	☐	**25 page 2**
Verification of production data if needed	☒	☐	☐	**25 page 2**
Identification of wastewater sources, flow and types of discharges (e.g. continuous, intermittent, batch).	☒	☐	☐	**25 page 2**
Condition of pretreatment facilities	☒	☐	☐	**25 page 3**
Evaluation of chemical storage areas	☒	☐	☐	**25 page 3**
Evaluation of need for spill/slug control plan at least every 2 years	☐	☒	☐	
Evaluation of spill/slug control procedures	☐	☒	☐	
Evaluation of housekeeping practices	☒	☐	☐	**25 page 2**
Evaluation of potential for hazardous waste discharge	☐	☒	☐	
Evaluation of self-monitoring equipment and techniques	☒	☐	☐	**25 page 4**
Evaluation of lab procedures	☐	☐	☒	Contractor, **25 page 4, A, #5**
Evaluation of monitoring records	☐	☐	☐	**25 page 5**
POTW Sampling of IUs				
How many sampling visits were conducted and documented in the last 12 months?	6 – **Attachment 3**			
Does the sampling documentation include:				
Name of the sampling personnel	☐	☐	☒	**Attachment 39/40** CoC
sample date/time	☐	☐	☒	**39/40** CoC
sample type	☐	☐	☒	**39/40** CoC
sample location	☐	☐	☒	**39/40** CoC
wastewater flow during sampling	☐	☐	☒	
sample preservation	☐	☐	☒	**39/40** CoC
chain of custody	☐	☐	☒	**39/40** CoC
analytical methods used	☐	☐	☒	**39/40** analysis page
analysis date	☐	☐	☒	**39/40** analysis page
name of analyst	☐	☐	☒	**39/40** analysis page
all analytical data	☐	☐	☒	**39/40** analysis page
Were all the regulated parameters monitored?	☐	☐	☒	**39/40** analysis page
Were 40 CFR 136 analytical methods used?	☐	☐	☒	**39/40** analysis page
IU Self-Monitoring and Reporting				
Has the IU submitted all required self-monitoring reports in the last 12 months?	☒	☐	☐	**Attachment 3**
Were all regulated parameters monitored at the required frequency?	☒	☐	☐	
Slug/Spill Control				
Have any slugs/spills been documented in the file?	☐	☒	☐	

Did the POTW require development of a slug/spill control plan?	☒	☐	☐	
Has the IU developed a slug/spill control plan?	☒	☐	☐	**Attachment 26**
When was the plan last updated?	May 2015			
Does the slug/spill plan contain:				
Description of discharge practices	☐	☒	☐	
Description of stored chemicals	☒	☒	☐	**Attachment 26 Section 4**
Procedure to prevent slugs/spills	☒	☐	☐	**Attachment 26 Section 6**
Procedure to notify POTW of slugs/spills	☒	☐	☐	**26 Section 5 and Appendix B**
Follow-up practices to minimize damage from slugs/spills	☒	☐	☐	**Attachment 26 Section 6**
List all visual observations pertaining to this section				

Mr. Redding provided Inspector Thomson with a chart listing significant non-compliance (SNC) for each IU from 2018-2021. Inspector Thomson observed zinc exceedances from New York Wire in 2019, 2020 and 2021 as well as solids exceedances from New York Wire in 2019. Mr. Redding stated that none of the occurrences caused a disruption to the facility's operations or caused the facility's discharge to exceed regulated parameters. According to Mr. Redding, the zinc issue at New York Wire has been resolved.

III. Records Review

As part of the inspection, the Inspector Thomson requested the documentation listed in **Attachment 9**, sent to Tony Thomas via email on 7/12/22 after a telephone conversation between Mr. Thomas and Inspector Thomson, noting that the dates and ID numbers listed in the document are not accurate. Inspector Thomson requested that the documents be provided within two weeks of the inspection, by 7/29/22. Starting on 8/4/22 and ending on 8/26/22, Mr. Redding sent Inspector Thomson a series of emails including all attachments, except the photo log (**Attachment 2),** in this report.

IV.Closing Conference

After the facility inspection, 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 3:00 PM.

V. List of Attachments

Attachment 1. NPDES Permit 2017
Attachment 2. Photo Log
Attachment 3. Summary Tables 2018
Attachment 4. PRETREATMENT SAMPLING 2022
Attachment 5. INSPECTION 21 PLANT 3

Attachment 6. Prohibited discharge standards. - National Categorical Pretreatment Standards
Attachment 7. INDUSTRIAL WASTE SURVEY
Attachment 8. Utz Spill Prevention Plan
Attachment 9. Copy of Copy of SNC Calculations (Rev February 4 2022)
Attachment 10. Upcoming NPDES CWA Pretreatment Inspection 7_14 info
Attachment 11. UTZ 2020
Attachment 12. UTZ 2021
Attachment 13. PERMIT 21-22 EMECO
Attachment 14. INSPECTION 21 EMECO
Attachment 15. EMECO 2020
Attachment 16. EMECO 2020 #2
Attachment 17. EMECO 2021
Attachment 18. EMECO 2021 #2
Attachment 19. IWM PERMIT 21-22 NEW
Attachment 20. IWM Inspection 2021
Attachment 21. 2021-2022 Permit McClarin
Attachment 22. McClarin INSPECTION 2021
Attachment 23. McClarin Emergency Action Plan (EAP) (Filbert)
Attachment 24. Sheppard PERMIT 21-22
Attachment 25. Sheppard INSPECTION 21
Attachment 26. RH Sheppard ppc plan rev 8
Attachment 27. Utz PERMIT 22-23
Attachment 28. IWM Spill Plan - ICP 2022 Update_05-03-2022
Attachment 29. Emeco Spill Plan
Attachment 30. UTZ 2021
Attachment 31. SHEPPARD 2021
Attachment 32. McClarin 2021
Attachment 33. EMECO 2021
Attachment 34. IWM 2021
Attachment 35. IWM 2021
Attachment 36. IWM 2021 #2
Attachment 37. McClarin 2021
Attachment 38. McClarin 2020
Attachment 39. SHEPPARD 2021
Attachment 40. SHEPPARD 2020