



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
FOUR PENN CENTER – 1600 JOHN F. KENNEDY BLVD.
PHILADELPHIA, PENNSYLVANIA 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): May 22-23, 2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Compliance Inspection
Facility Name: City of Lancaster
Facility Address: 1220 New Danville Pike, Lancaster, PA 17603
Facility Latitude: 40.0186
Facility Longitude: -76.3080
County/Parish: Lancaster County
Permit No: PA0026743
NAICS Code: 221320
SIC: 4952
Unique Project #: 3E23WN084A

Facility Representative(s):

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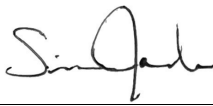
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Date

Attachments

Attachment A Industrial User Site Visit Data Sheets

Attachment B Industrial User Site Visit Photograph Log

I. Inspection Summary

Upon arrival, EPA contractors Chuck Durham and Sirese Jacobson (Inspection Team), met with the City of Lancaster (the City) contact Zachary Runk (City representative). The inspector discussed the purpose and format of the pretreatment compliance inspection (PCI or inspection) and interviewed the City representative about the City's pretreatment program.

As part of the PCI, the Inspection Team reviewed the following nondomestic discharger files:

- Kunzler & Company, Inc. (Kunzler; non-categorical significant industrial user [SIU])
- K&L Plating Company, Inc. (categorical industrial user [CIU] subject to Title 40 of the *Code of Federal Regulations* [40 CFR] Part 413.14(b)*)
- LSC Communications, Lancaster West (non-categorical SIU)
- VLS Environmental Solutions Lancaster LLC (CIU subject to 40 CFR 437.25 pretreatment standards for existing sources, Subpart B Oils Treatment and Recovery; partial file review only)

As part of the inspection, the Inspection Team also conducted site visits at Kunzler and K&L Plating.

The last review of the City's pretreatment program was an NPDES Pretreatment Field Audit Inspection performed by EPA on August 23, 2018 and September 19, 2018.

*The City classified K&L Plating as an electroplating facility subject to 40 CFR 413.14(b); however, based on the site visit and discussions with the facility representative, the facility's operations are subject to the metal finishing category, pretreatment standards for new sources at 40 CFR 433.17.

II. Program Description

The City owns the City of Lancaster Advanced Wastewater Treatment Plant (WWTP). The WWTP has a design hydraulic capacity of 32.08 million gallons per day (MGD). The actual flow listed in the 2022 annual pretreatment report is 18.056 MGD. The WWTP treats wastewater from within the City of Lancaster as well as portions of Manheim Township, Lancaster Township, East and West Lampeter Townships, Strasburg Borough, Strasburg Township, Upper Leacock Township, West Earl Township, Manor Township, Pequea Township, and East Hempfield Township. The WWTP treats wastewater using screening, primary clarification, activated sludge, final clarification, and disinfection with chlorine and sodium bisulfite, and dichlorination.

III. Industrial User (IU) Characterization

IUs currently identified by the Control Authority (CA)	IU Type	
15	Discharging Significant Industrial Users	
	6	Discharging Non-Categorical SIUs (as defined by the CA)
	9	Categorical Industrial Users (CIUs)
	0	Middle Tier CIUs
1	Zero-Discharging CIUs	
Not applicable (N/A)	Non-significant CIU (NSCIU)	
14	Other Regulated IUs (e.g., permitted IUs)	

	Describe: The City also permits non-significant industrial users, including printing manufacturing facilities, carboard manufacturers, and groundwater remediation sites.
0	Waste Haulers Describe: The POTW does not accept hauled waste at the WWTP.

IV. Findings Summary Table

Finding A.1.a – The City representative was not sure when the local limits were last evaluated.
Finding A.1.b. – It is unclear when the ERP was last revised.
Finding B.1. – The City does not perform formal industrial waste surveys.
Finding C.4.a – The permits reviewed were lacking bypass notification requirements.
Finding C.4.b – The permits reviewed do not specify that composite samples must be collected as flow-proportional composite samples.
Finding C.4.c – The permits reviewed contained incomplete record keeping requirements.
Finding C.4.d – The K&L and VLS Environmental Solutions permits did not include the correct categorical classifications.
Finding C.4.e – The permits reviewed did not include civil and criminal penalty amounts.
Finding C.4.f – The permits reviewed did not include specific language requiring the development of a slug discharge control plan.
Finding C.4.g – The K&L Plating permit does not include all categorical limits.
Finding E.5 – The Kunzler SMR summary pages submitted by the IU include values listed as averages for pH.
Finding F.1 – The City was not documenting all enforcement actions taken in instances of SIU noncompliance.
Kunzler & Company, Inc. Site Visit Data Sheet – The inspection team observed chemicals that were lacking secondary containment.
Kunzler & Company, Inc. Site Visit Data Sheet – The City and SIU are not sampling at the location identified in the SIU’s discharge permit.
Kunzler & Company, Inc. Site Visit Data Sheet – The inspection team observed a handwash sink without appropriate signage.

V. Evaluation

The Inspection Team discussed the topics in Subsections A-F below regarding the pretreatment program with the City representatives. The Inspection Team also reviewed SIU files to assess the retention of required program documents and to generally evaluate overall program implementation. The following sections describe program areas of concern identified during the inspection process along with compliance assistance items, and associated references to 40 CFR Part 403. All compliance assistance items are included strictly for informational purposes and should not be construed as a formal order or instruction from EPA.

A. Control Authority (CA) Pretreatment Program Modification

1. When was the last program modification? Did the CA notify the EPA of program modifications? (40 CFR 403.18)

According to the City representative, the City last revised its SUO in 2017, but was unsure when local limits were reviewed/revised. In addition, the City added a Fats, Oils, and Grease (FOG) program in 2021. See the findings below for additional discussion on program legal authority modifications.

Finding A.1.a – The City representative was not sure when the local limits were last evaluated.

Regulatory Requirement

The federal regulations at 40 CFR 403.5(e)(1) require the Control Authority to develop and enforce local limits. Each POTW with an approved pretreatment program shall continue to develop these limits as necessary, and effectively enforce such limits.

Finding A.1.b. – It is unclear when the Enforcement Response Plan (ERP) was last revised.

The ERP provided onsite did not specify a published date.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(5) require the Control Authority to “develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance.”

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes. The WWTP treats wastewater from the City of Lancaster as well as portions of Manheim Township, Lancaster Township, East and West Lampeter Townships, Strasburg Borough, Strasburg Township, Upper Leacock Township, West Earl Township, Manor Township, Pequea Township, and East Hempfield Township.

For any industrial users located in these jurisdictions, the City of Lancaster provides all pretreatment program oversight.

B. IU Characterization

1. Describe the CA’s procedure for identifying and locating IUs that might be subject to the pretreatment program. Has the CA identified and located all applicable IUs (non-categorical SIUs, CIUs, NSCIUs, etc.)? (40 CFR 403.8(f)(2)(i))

Finding B.1. – The City does not perform formal industrial waste surveys.

According to the City representative, new industrial users are required to submit a building permit

application. Receipt of this application will trigger notice to the pretreatment group of these new industrial users.

Regulatory Requirement

40 CFR 403.8(f)(2)(i) requires the City to have procedures to “identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program.”

2. Has the CA identified the character and volume of pollutants contributed to the publicly owned treatment works (POTW) by IUs subject to the pretreatment program? (40 CFR 403.8(f)(2)(ii))

Yes, the City conducts inspections and compliance monitoring at each SIU at least annually.

3. Has the CA prepared and maintained a list of SIUs, as defined in 403.3(v)(1), along with the applicable SIU criteria? Does the list indicate whether the CA has made a determination that an SIU is a NSCIU, as defined in 403.3(v)(2), rather than an SIU? Have modifications to the list been submitted with annual reports? (40 CFR 403.8(f)(6))

Yes, the City maintains a current list of SIUs, which it submits in the annual reports to EPA Region 3. The City had not designated any SIUs as NSCIUs at the time of the inspection.

According to the City representatives, LSC-West is going out of business, and Johnson & Johnson is closing in 2023. City representatives noted that there had been some communication about a dairy facility moving in to the LSC-West building, but nothing had been confirmed at the time of this inspection.

C. Control Mechanism Evaluation

1. Has the CA issued individual or general control mechanisms to all SIUs? (40 CFR 403.8(f)(1)(iii))

All SIUs whose files were reviewed during the inspection had been issued an individual permit. The City did not issue any general permit options at the time of the inspection.

2. Do the applications for general control mechanism contain all of the following? (40 CFR 403.8(f)(1)(iii)(A)(2))

- a. Contact info**
- b. Production processes**
- c. Types of wastes generated**
- d. Location for monitoring**
- e. Any request for waiver for pollutants not present per 40 CFR 403.12(e)(2)**

Not applicable (N/A). The City had not issued general control mechanisms at the time of the inspection.

3. Are general control mechanisms only issued for IUs where all of the following is true?
(40 CFR 403.8(f)(1)(iii)(A)(1))

- a. Involve same/substantially similar types of operations
- b. Discharge the same type of waste
- c. Same effluent limitations
- d. Same or similar monitoring
- e. There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations

N/A. The City had not issued general control mechanisms at the time of the inspection.

4. Do both individual and general control mechanisms include the following, where applicable?
(40 CFR 403.8(f)(1)(iii)(B))

- a. Statement of duration (5 years max)
- b. Statement of non-transferability
- c. Applicable effluent limits (local limits, categorical standards, BMPs)
- d. Self-monitoring requirements
 - Identification of pollutants to be monitored
 - Sampling frequency
 - Sampling locations/discharge points
 - Appropriate sample types
 - Reporting requirements
 - Record-keeping requirements
- e. Statement of applicable civil and criminal penalties
- f. Compliance schedules
- g. Notice of slug loading or potential problems at POTW
- h. Notification of spills, bypasses, upsets, etc.
- i. Notification of significant change in discharge
- j. 24-hour notification of effluent violation
- k. Submit resampling results within 30-days
- l. Slug discharge control plan requirement, if required by POTW
- m. Certification statements
- n. Sampling/analysis requirements (Part 136 or alternative)
- o. Reporting of additional sampling
- p. 90-day compliance report

The individual SIU permits reviewed as a component of the inspection included most, but not all of the aforementioned provisions. Findings regarding the content of individual control mechanisms are provided below. The City had not issued general control mechanisms at the time of the inspection.

Finding C.4.a – The permits reviewed were lacking bypass notification requirements.

The K&L Plating and Kunzler permits did not contain the bypass notification requirements.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include “[s]elf-monitoring, sampling, reporting, notification, and record keeping requirements.”

The federal regulations at 40 CFR 403.17 require industrial users to notify the City of any potential bypasses.

Finding C.4.b – The permits reviewed do not specify that composite samples must be collected as flow-proportional composite samples.

The K&L Plating and Kunzler permits require composite samples for appropriate parameters; however, the definition of “composite” in the permits is ambiguous. It is defined as either flow- or time-proportional composite samples.

Regulatory Requirement

The federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require that control mechanisms include self-monitoring, sampling, reporting, notification, and recordkeeping requirements, including the identification of pollutants to be monitored, sampling location, sampling frequency, and sample type.

The federal requirements in 40 CFR Part 403.12(g)(3) require 24-hour composite samples “must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. Where time-proportional composite sampling or grab sampling is authorized by the Control Authority, the samples must be representative of the Discharge and the decision to allow the alternative sampling must be documented in the Industrial User file for that facility or facilities.”

Finding C.4.c – The permits reviewed contained incomplete record keeping requirements.

The Kunzler and K&L Plating permits included record retention requirements, but did not specify that the record retention period can be extended at the request of EPA.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require permits to include “[s]elf-monitoring, sampling, reporting, notification, and record keeping requirements.”

The federal regulations at 40 CFR 403.12(o)(2) require records to be retained for at least three years. Additionally, the retention period may be extended during unresolved litigation or when requested by the [EPA] Regional Administrator.

Finding C.4.d – The K&L and VLS Environmental Solutions permits did not include the correct categorical classifications.

The K&L Plating permit specifies that the CIU is subject to the categorical pretreatment standards at 40 CFR 413.14. However, based on the site visit and discussion with the CIU representative, the facility should be classified as a CIU subject to 40 CFR 433.17, metal finishing category, pretreatment standards for new sources. In addition, the K&L Plating permit does not specify the applicable category, subpart, or new versus existing source.

Similarly, the VLS Environmental Solutions permit does not specify the applicable category, subpart,

or new versus existing source. Based on information included in the SIU fact sheet, the facility is subject to 40 CFR 437.25, Subpart B, Oils Treatment and Recovery, pretreatment standard for existing sources.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to contain effluent limits based on categorical pretreatment standards and local limits. In addition, 40 CFR 403.8(f)(2)(iii) requires POTWs to notify industrial users of applicable pretreatment standards and requirements.

The federal regulations at 40 CFR 403.8(f)(2)(iii) require the control authority to notify industrial users of applicable pretreatment standards and requirements. The federal regulations at 40 CFR 433.17 provide the pretreatment standards for new sources under the metal finishing category.

Finding C.4.e – The permits reviewed did not include civil and criminal penalty amounts.

The K&L Plating and Kunzler permits only reference the SUO for civil and criminal penalty amounts.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(5) require “Both individual and general control mechanisms...” to contain a “...statement of applicable civil and criminal penalties.” Additionally, 40 CFR 403.8(f)(1)(vi)(A) requires the City to have the legal authority to “seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.” In the July 24, 1990, Federal Register, EPA addressed comments pertaining to incorporation by reference to the proposed amendments to 40 CFR Part 403 that which specified minimum criteria for industrial user permits including applicable civil penalties. In the response to comments, EPA specifically stated that “The Agency believes that incorporation by reference is generally not appropriate because of the importance of effective notice to the significant industrial user of all pretreatment requirements contained in the individual control mechanism.” As a result, the final rule was promulgated in November 1990 maintaining the requirement as it exists still today.

Finding C.4.f – The permits reviewed did not include specific language requiring the development of a slug discharge control plan (SDCP).

During the interview, the City representative noted that approximately one-third of the SIUs are required to implement SDCPs, but that this requirement is not included in the permits.

Regulatory Requirement

The federal pretreatment regulations at 40 CFR §403.8(f)(1)(iii)(B)(6) state that control mechanisms must include requirements to develop a slug discharge control plan if the POTW has determined that a SDCP is necessary. 40 CFR §403.8(f)(2)(vi) lists the required components of a SDCP.

Finding C.4.g – The K&L Plating permit does not include all categorical limits.

The discharge limits in the K&L Plating permit do not match the categorical pretreatment standards in 40 CFR 413.14. The City’s daily maximum local limits are more stringent than the categorical standards in 40 CFR 413.14, except for lead. However, the City must include monthly average limits from 40 CFR 413.14 since both limits apply. Furthermore, the daily maximum limits for copper and

zinc also do not match the local limit listed in the City of Lancaster SUO. In addition, the long-term average limit for lead is listed in the discharge permit as a monthly average. The actual categorical standard of 0.4 mg/l is a 4-day average.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(3) require permits to contain effluent limits based on general pretreatment standards in 40 CFR Part 403, categorical pretreatment standards, local limits, and State and local law.

D. Application of Pretreatment Standards and Requirements

1. Does the CA apply all applicable pretreatment standards? (40 CFR 403.8(f)(1)(ii) and 403.8(5))

Based on the files reviewed, the City has applied all applicable pretreatment standards, except as noted in Finding C.4.g above pertaining to improper classification.

2. Has the CA evaluated the need for SIUs to develop slug discharge control plans? (40 CFR 403.8(f)(2)(vi))

Yes, according to the City representative, all SIUs have been evaluated for the need to develop slug discharge control plans and approximately one-third of SIUs have slug discharge control plans. However, the City representative noted that the SIU permits do not require implementation of the slug discharge control plan (see Finding C.4.f).

E. Compliance Monitoring

1. Has the CA inspected and independently sampled each SIU at least once a year? Middle tier CIUs at least once every two years? Sample once during term of CIU control mechanism if CIU sampling waived for pollutants not present? (40 CFR 403.8(f)(2)(v), 403.12(e)(2), 403.12(e)(2))

Yes, based on the SIU files reviewed and responses from the City representative, the City has been conducting inspections and sampling at least once per year.

2. Has the CA used proper sampling and analysis procedures (40 CFR Part 136) and inspection procedures? Were the procedures done with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions? (40 CFR 403.8(f)(2)(v) and (vii), 403.12(g)(5))

Yes, according to the information reviewed during the inspection, the City uses proper sampling, analysis, and inspection procedures.

3. Has the CA kept records for three years including the following? (40 CFR 403.12(o))

- a. Period compliance reports and other reports/notices**
- b. All monitoring records including: sample date, place, method, time, personnel; analysis date, personnel, method; results**

- c. BMP compliance documentation**
- d. Other monitoring records**

Based on the files reviewed, the City maintains records for at least three years.

- 4. Has the CA evaluated, at least once per year, whether NSCIUs continue to meet the criteria of an NSCIU? (40 CFR 403.8(f)(2)(v)(b), 403.3(v)(2))**

N/A. The City was not implementing the option to classify industries as NSCIUs at the time of the inspection.

- 5. Has the CA required, received, and analyzed reports and other notices from SIUs? (40 CFR 403.8(f)(2)(iv))**

- a. Self-monitoring reports**
- b. BMRs and 90-day compliance reports**
- c. Compliance schedules reports**
- d. Notice of slug loading or potential problems at POTW**
- e. Notification of spills, bypasses, upsets, etc.**
- f. Notification of significant change in discharge**
- g. 24-hour notification of effluent violation**
- h. Resampling results within 30-days**
- i. Other reports/notifications required by the CA**

Based on the files reviewed during the inspection, the City has been requesting, receiving, and analyzing required reports except as noted below.

Finding E.5 – The Kunzler SMR summary pages submitted by the IU include values listed as averages for pH.

Results for pH cannot be averaged as it is expressed in a logarithmic scale. The inspection team could not find any evidence in the Kunzler file to indicate the City personnel identified this reporting error or took enforcement action for the inaccurate reporting.

- 6. Have SIUs monitored to demonstrate continued compliance and re-sampled after violation(s)? (40 CFR 403.12(g)(1) & (2))**

Yes, based on the files reviewed, SIUs have re-sampled after violations.

- 7. Has the CA ensured CIUs report on all regulated pollutants at least once every 6 months? (40 CFR 403.12(e)(1) & (g)(1))**

Based on the CIU files reviewed, the City requires CIUs to report on regulated pollutants at least once every six months.

- 8. Has the CA ensured non-categorical SIUs self-monitor and report at least once every 6 months with a description of the nature, concentration, and flow of the pollutants required**

to be reported by the Control Authority? (40 CFR 4.312(h) & (g)(1))

Based on the files reviewed, the City has ensured that non-categorical SIUs self-monitor and report at least once every six months.

9. Has the CA required self-monitoring reports from CIUs to be signed and certified? (40 CFR 403.12(b)(6), 403.12(l))

Based on the CIU files reviewed, the City requires self-monitoring reports to be signed and certified.

10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12 (j) & (p))

The City representative explained that Kunzler experienced an ammonia leak from its cooling system on March 12, 2023 and did not notify the City. The City experienced elevated pH readings and ammonia concentrations at the influent as well as elevated concentrations of ammonia in the effluent. A WWTP operator noticed an ammonia odor at the south grit building on March 12, 2023. During this event, the City's effluent ammonia levels spiked to 4.2 mg/l, well over the average concentration of 0.136 mg/l. Within 24 hours, the ammonia concentration had dropped to 0.642 mg/l, still well over the effluent average value. However, within 48 hours, ammonia levels at the WWTP had returned to normal with no NPDES permit violations. The POTW had a meeting with the SIU the week following the incident. The SIU indicated that they notified EPA and PA DEP of the ammonia leak but did not notify the POTW. The City issued a NOV with an associated upfront penalty to the SIU, which was in the appeals process at the time of the inspection. The City indicated that the SIU did not currently have a SDCP.

F. Enforcement

1. Has the CA implemented its enforcement response plan (ERP)? (40 CFR 403.8(f)(5))

Finding F.1 – The City was not documenting all enforcement actions taken in instances of SIU noncompliance.

Based on the files reviewed and discussion with the City representative, the City was taking enforcement action in accordance with its ERP. However, the City was not documenting each enforcement action. For example, based on the file review, Kunzler experienced seven pH limit exceedances in 2022 and one in 2023 during its self-monitoring events. The file did not contain documentation of enforcement actions taken by the City for these permit limit violations. Similarly, the inspection team noted a pH violation from City monitoring in February 2022 in the K&L Plating file with no evidence of enforcement action taken. According to the City representative, the City provided verbal warnings for these pH limit exceedances which is an acceptable response per the City's ERP; however, the City did not document these verbal warnings.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1) require the City to implement its legal authority, including the authority to enforce pretreatment program requirements.

2. Does the CA evaluate both numeric and narrative criteria for significant non-compliance

(SNC) and annually publish a list of IUs in SNC? (40 CFR 403.8(f)(2)(viii))

Yes, the City evaluates SNC according to the definition in its SUO. The City publishes a list of SIUs annually in SNC in *The Lancaster Online*.

2.a Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status.

Yes. In 2022, LSC Communications West, was in SNC for oil and grease violations. At the time of the PCI, based on sampling performed through the 1st quarter 2023, LSC Communications West had returned to compliance. During the interview portion of the PCI, the City representative noted that the facility is going out of business (not as a result of compliance issues).

3. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A))

Yes. The City uses compliance schedules. At the time of the PCI, Kunzler was on a compliance schedule due to an ammonia leak (for additional details, see question E.10). In addition, a non-significant industrial user, Treehouse Foods, recently completed a compliance schedule to install a filter press and pH system. Treehouse Foods is a food processor that manufactures pretzels.

4. Has the CA ensured CIU compliance within 3 years of standards effective date (or less than 3 years where required by standard)? (40 CFR 403.6(b))

N/A. The City did not identify any new CIUs or CIUs subject to a new categorical standard.

5. Has the CA ensured CIUs submit complete baseline monitoring reports and 90-day compliance reports within the required time frames? (40 CFR 403.12(b) & (d))

The inspection team did not review any baseline monitoring reports or 90-day compliance reports for the CIU files reviewed as these documents were not within the timeframe for documents reviewed.

G. Additional Evaluations

1. Hauled Waste

The City does not accept hauled waste of any kind at the WWTP.

2. Dental Mercury Program

According to the City representative, all one-time certification reports have been received.

Attachment A

Industrial User Site Visit Data Sheets

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Kunzler & Company, Inc.					
Address of industry: 652 Manor Street, Lancaster, PA 17604					
Date of visit: 5/22/2023			Time of visit: 1:20 PM – 3:45 PM		
Name of inspectors: Zachary Runk (City of Lancaster) Jessica Duffy and Erin DeSandro (EPA Region 3) Heather Dock and Patrick McGhee (PADEP) Chuck Durham and Sirese Jacobson (PG Environmental)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Bill Chirdon		Director of Food Safety		717-390-2105 / bchirdon@kunzler.com	
IU Permit Number: 1016		Exp. Date: July 31, 2024		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility is a meat packaging plant that produces 25 different types of hotdogs as well as different types of hams, lunch meats, and roast beef.					
2. Number of employees:		159	Number of shifts:		3
			Hours of operation:		7:00 am – 5:00 pm, Monday - Friday
3. Wastestream flow(s) discharged to the POTW: Wastewater is generated primarily from equipment and facility washdown.					
Sanitary:		Not reviewed (N/R)		Process: 70-80,000 gpd	
				Combined: N/R	
4. Describe any significant changes in process or flow: The facility has installed a new pump, pH meter, and flow meter since the last City inspection.					
5. Type of pretreatment system (Describe): From the process areas, wastewater is captured in a pit. Wastewater is pumped through a chopper pump into a series of holding tanks (see Photo 1) with a total capacity of 2,000 gallons. The tanks are aerated, and floatable solids (see Photo 2) are decanted off daily and sent to the municipal landfill. The facility monitors pH in the last holding tank (see Photo 3). As needed, pH adjustment is accomplished using sulfuric acid and sodium hydroxide.					
X	Continuous flow			Batch	
				Combined	
6. Process area description (identify raw materials and processes used): A variety of raw meat products are cut, chopped, and blended with spices and other ingredients and then pumped into casings before going into oven for cooking. The facility representative noted that shut down is scheduled for early August for a period of 8 weeks to install a new oven. The facility has 4 smokers that are cleaned once per week. Washwater drains to pit in waste treatment area.					
7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): According to the facility representative, the facility uses sodium hydroxide, chlorine, and peracetic acid.					
Any floor drains?		Yes	Any spill control measures?		Spill kits
8. Are hazardous wastes drummed and labeled? Not observed.					

9. Does the IU have hazardous waste manifests?

According to the facility representative, hazardous waste is generated from the facility's parts cleaner. Washwater from the parts cleaner is picked up by Safety Kleen every 3-4 months. The City inspector requested the most recent hazardous waste manifest for the parts washer from the facility representative.

10. Solid waste production and disposal: Flocculant is pulled off the top of the holding tanks and hauled offsite by Republic Waste.

11. Description of sample location and methods:

The permit lists the sampling point as the "flow measurement pit" (see Photo 4) but the City and IU are sampling from the open pit and pH is being measured in holding tank. The discharger uses ALS Environmental for sampling and analysis.

Notes:

- John Kline Services pumps out the holding tanks every 2 weeks.
- Review of NOV status:
 - Per the NOV issued by the City on April 11, 2023, the facility has updated its emergency plan to include the City contact, positioned pigs in the process area and plugged drains, and is still developing a maintenance checklist. The facility is also conducting dye testing to confirm all domestic and other non-process lines.
- During the closing conference, the City inspector requested from the facility the following: calibration records, hazardous waste manifest for the parts washer, grease trap manifest, and the number of floor drains in the production area.

1. **Finding – The inspection team observed chemicals that were lacking secondary containment.**

The inspection team observed multiple areas within the facility where chemicals were not properly contained (see Photo 5).

2. **Finding – The City and SIU are not sampling at the location identified in the SIU's permit.**

The permit lists the sampling point as the "flow measurement pit" but the City and IU are sampling from the open pit located next to the final holding tank where pH is being measured.

3. **Finding – The inspection team observed a handwash sink without appropriate signage.**

The inspection team observed a sink near the cooking line that did not contain a sign to indicate handwash only and no dumping of chemicals.

IU SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: K&L Plating					
Address of industry: 524 East Mifflin Street, Lancaster, PA 17602					
Date of visit: 5/23/2023			Time of visit: 8:55 AM – 10:00 AM		
Name of inspectors: Zachary Runk (City of Lancaster) Jessica Duffy and Erin DeSandro (EPA Region 3) Chuck Durham and Sirese Jacobson (PG Environmental)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
James Struck		Owner		717-397-9818	
IU Permit Number: 1010		Exp. Date: October 31, 2024		IU Classification: Permitted by the City as a CIU subject to 40 CFR 413; however, the correct classification is 40 CFR 433.17.	
Please provide the following documentation:					
1. Nature of operation: The facility is a job shop that performs zinc plating, electroless nickel plating, anodizing, phosphating, and passivating.					
2. Number of employees:		20		Number of shifts: 1	
				Hours of operation: 7:00 am – 3:30 pm	
3. Wastestream flow(s) discharged to the POTW: Wastestreams discharged to the City includes rinse water from the plating lines.					
Sanitary:		N/R		Process: 8,000 gpd (estimated)	
				Combined: N/R	
4. Describe any significant changes in process or flow: None.					
5. Type of pretreatment system (Describe): The facility's pretreatment system consists of pH adjustment, and clarification. The facility collects rinse water from the plating lines which collects in a sump. The pH of the wastewater is adjusted using caustic soda, hydrochloric acid, or sulfuric acid in pH adjust #1 tank and pH adjust #2 tank (both 2,500-gallon tanks). Wastewater is then pumped to the clarifier for metals precipitation. Effluent from the clarifier is then pumped into the equalization tanks (600 gallons), and then discharged to the City. Sludge from the clarifier is pumped to the sludge holding tank and then to the filter press. Leachate from the filter press is pumped back to pH adjustment. The filter cake is collected in bags and hauled offsite approximately every 90 days by Environmental Quality of New York as hazardous waste.					

x	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): As stated above, the facility performs non-cyanide alkaline zinc plating, electroless nickel plating, sulfuric acid anodizing, phosphating, and passivation. The facility representative stated that approximately 90% of incoming parts are carbon steel and 10% are non-ferrous metals. According to the facility representative, the facility added an anodizing line in 2008.					
7. Chemical storage area (identify the chemicals that are maintained on site and how they are stored): The inspection team observed the facility's chemical storage areas where they store plating solutions. No floor drains were present in the area.					
Any floor drains?		No	Any spill control measures?		No
8. Are hazardous wastes drummed and labeled? Yes					
9. Does the IU have hazardous waste manifests? N/R					
10. Solid waste production and disposal: Sludge from the plating lines is hauled offsite as hazardous waste.					
11. Description of sample location and methods: The sampling point is located in the room adjacent to the lobby under a board (see Photo 6). According to the facility representatives, the facility staff collect the compliance samples using both grab and time-proportional composite samples. M.J. Ryder is the contract lab used for sample analysis.					
Notes:					
- The City inspector requested a copy of the latest manifest for disposal of used oil. - The EPA inspection team noted that the facility added a new anodize line and zinc plating line in 2008, and therefore will need to be reclassified as a new source metal finishing subject to 40 CFR 433.17 (see Finding C.4.d).					

Attachment B

Industrial User Site Visit Photo Log



Photograph 1. View of the holding tanks in the treatment area at Kunzler.



Photograph 2. View of floatable O&G on top of the holding tanks at Kunzler.



Photograph 3. View of the holding tank where the facility is measuring pH at Kunzler.



Photograph 4. The flow measurement pit identified in the permit as the designated sample point at Kunzler.



Photograph 5. Improper use of secondary containment for chemical storage at Kunzler.



Photograph 6. View of the sampling point at K&L Plating.