



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): April 30, 2024
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Pretreatment Industrial User Inspection
Facility Name: Great Lakes Manufacturing, Inc.
Facility Address: 1521 Enterprise Road, Corry, PA 16407
Facility Latitude: 41.942637° N
Facility Longitude: -79.638455° W
County/Parish: Erie County
Permit No: PAP228223
NAICS Code: 332117
SIC: 3471
Unique Project #: ECAD-490

Facility Representative(s):

John Tabolt, Great Lakes Manufacturing
Email: tabolt@greatcabinets.com

Point of Contact



(Full list of additional attendees in Table 1)

Inspectors:

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

Report Preparer

A handwritten signature in black ink that reads "Chuck Durham".

7/2/2024

Signature/Date

Chuck Durham, Eastern Research Group

Date

Supervisor

Signature/Date

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

Date

	TABLE OF CONTENTS	Page
I.	INTRODUCTION.....	3
II.	INSPECTION PROCESS	3
	Inspection Opening Conference	3
	Facility Inspection.....	4
	Summary of Observations.....	5
	Self-Monitoring.....	5
	Closing Conference	6

Appendix A: Industrial User Requirements (PAP228223)

Appendix B: Photograph Log

Appendix C: July-December 2023 Self-Monitoring Report

I. INTRODUCTION

On April 30, 2024, a representative from EPA Region 3's contractor, Eastern Research Group, and representatives from EPA Region 3 (hereinafter, the Inspection Team) conducted an industrial user pretreatment inspection at Great Lakes Manufacturing, Inc. (hereinafter, Facility or GLM) in Corry, Pennsylvania. The purpose of the inspection was to evaluate compliance with the requirements of the *Federal Pretreatment Regulations at 40 CFR Part 403*. The inspection also evaluated compliance with Industrial User Requirements (PAP228223, included as [Appendix A](#)) issued by EPA Region 3 in April 2003. The inspection consisted of conversations with facility personnel and an inspection of the facility's process area, wastewater generating processes, discharge and sampling location, and chemical storage area.

The Facility is located at 1521 Enterprise Road, Corry, PA. The Facility is a metal fabricator that performs laser cutting, metal forming (using press breaks), powder coats, and fabricates metal pieces for its sister company to assemble into cabinets. The Facility employs approximately 90 staff. According to the Facility representative, there had been no recent physical or process changes to the Facility at the time of the inspection, and none were planned.

The Facility performs monthly on-site analysis of pH via grab samples. AG Aegis Company, the Facility's contractor, conducts sampling once every six months for cadmium, chromium, copper, lead, nickel, silver, zinc, cyanide, and total toxic organics (TTO). Samples are analyzed by Pace Analytical. Composite samples of the three-stage washer line are taken from the sampling port on the rinse tank. Samples of the five-stage washer line are taken by collecting grab samples out of each tank. Photographs taken during the inspection are included in [Appendix B](#) (Photograph Log) and specific photos related to observations will be specified in the Summary of Observations section of this report below.

II. INSPECTION PROCESS

Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 8:00 AM (EDT) for the inspection. Mr. Chuck Durham of Eastern Research Group, along with Ms. Allison Gieda and Ms. Erin Desandro of EPA Region 3 displayed their Clean Water Act inspector credentials to Facility representatives upon entry and explained the primary purpose of the inspection was to evaluate the Facility's compliance relevant to the industrial user discharge requirements and *Federal Pretreatment Regulations at 40 CFR Part 403*. The Inspection Team explained that any information that the Facility deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 lists the individuals that participated in the inspection.

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Chuck Durham, Inspector	Eastern Research Group	(615) 888-2928	chuck.durham@erg.com
Allison Gieda, Inspector	EPA Region 3	(304) 234-0232	gieda.allison@epa.gov
Erin Desandro, Inspector	EPA Region 3	(215) 814-2125	desandro.erin@epa.gov
Facility Representatives			
John Tabolt, Director of Quality	GLM	(814) 434-4472	tabolt@greatcabinets.com

During the opening conference, the Facility representative confirmed for the Inspection Team that process wastewater is discharged to the City of Corry Wastewater Treatment Plant. Facility wastewater consists of rinse tanks from the three-stage and five-stage washers that are part of the Facility's powder coating lines. For the July – December 2023 reporting period, the Facility reported an average flow of 119 gallons per day (gpd) from the three-stage washer and 1,584 gpd from the five-stage washer.

During the opening conference, the Facility representative informed the Inspection Team that the Facility has not been issued a permit to discharge to the City of Corry Wastewater Treatment Plant. The City of Corry does not have an approved pretreatment program and does not issue permits for its industrial contributors. However, the Facility was notified of applicable limits and monitoring requirements in an April 2003 authorization to discharge letter from EPA Region 3.. The April 2003 authorization to discharge letter from EPA Region 3 also included the Facility's Toxic Organic Management Plan (TOMP) and notice of approval of the TOMP.

The Facility representative stated that the Facility does not generate hazardous waste. Laser dust waste and spent powder are picked up by Miller Environmental. Miller Environmental also hauls off-site phosphate tank waste and spent oil. Scrap metal is recycled.

Facility Inspection

As part of the inspection, the Inspection Team visually observed and photographed Facility conditions in the presence of the Facility representative (refer to [Appendix B, Photographs 1 through 9](#)). The Facility consists of a single building. The Facility is a metal fabricator that powder coats parts for final assembly off-site, and is subject to the metal finishing standards in 40 CFR Part 403.

The Facility receives steel, aluminum and small volumes of galvanized steel, and organizes them in a staging area. Depending on the customer specifications, parts are formed using various processes, including shearing, punching, laser cutting, forming, welding, saw cutting, and/or grinding, as well as degreasing (parts washer). The parts washer (refer to [Appendix B, Photographs 1-2](#)) is periodically pumped out and shipped off-site by Safety Kleen. Parts may then be washed in either the three-stage or five-stage washer prior to powder coating.

At the time of the inspection, the Facility's three-stage washer was available for production but was not in operation. According to the Facility representative, this line is used approximately twice per month. The Facility's three-stage washer consists of the following steps:

- Tank #1 - iron phosphate wash to etch surface in preparation for powder coating operation
- Tank #2 - water rinse flowing at 180 gallons per hour
- Tank # 3 - water rinse flowing at 60 gallons per hour

The Facility's five-stage washer consists of the following steps:

- Tank #1 - alkaline cleaner
- Tank #2 - water rinse flowing at 225 gallons per hour (refer to [Appendix B, Photograph 4](#))
- Tank #3 - iron phosphate wash to etch surface in preparation for powder coating operation (refer to [Appendix B, Photograph 5](#))
 - - ammonium bifluoride is added to tank 3 when etching aluminum (refer to [Appendix B, Photograph 9](#))
- Tank #4 - water rinse flowing at 186 gallons per hour (refer to [Appendix B, Photograph 6](#))
- Tank #5 - water rinse flowing at 60 gallons per hour (refer to [Appendix B, Photograph 7](#))

After the washer line, some parts are then powder coated. Parts are then assembled and packaged for additional processing off-site.

Records Review

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

- Self-monitoring reports for 2023-2024
- Self-monitoring reports for 2022 (submitted to Inspection Team via email post inspection)
- Toxic Organic Management Plan (TOMP)
- 2016 EPA Region 3 Inspection Report
- Process Flow of Operations
- Hazardous Waste Manifests

Summary of Observations

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

Self-Monitoring

During the opening conference, the Facility representative indicated that the three-stage washer is only used periodically.

- Observation 1.** The Facility representative stated that the three-stage washer is only used approximately two times a month. Because the Facility's contractor collects samples once every six months, the Facility should take appropriate actions to ensure that the samples are taken on a date that would capture discharge from the three-stage washer to ensure representative sampling is conducted.
- Observation 2.** The July-December 2023 SMR (dated 1/3/2024) (refer to Appendix C) reported values for pH in the average monthly column on page 3. The inspection team pointed out that pH cannot be averaged and should not be reported as a monthly average result.
- Observation 3.** The Facility's July – December 2023 SMR indicates that cadmium, chromium, copper, lead, nickel, silver, and zinc were analyzed using EPA Method 6010d. However, this method is not listed in 40 CFR Part 136. The federal regulations at 40 CFR 403.12(b)(5)(v) require self-monitoring samples to be analyzed using test methods listed in 40 CFR Part 136. The inspection team noted that the January-June 2023 SMR cites EPA Method 200.7 for these same parameters, which is an approved method for metals analysis listed in 40 CFR Part 136.
- Observation 4.** During the interview, the Inspection Team asked how samples were being collected for self-monitoring. The Facility representative had Tim Coldren with AG Aegis (the Facility's consultant) join the meeting by phone to address this question. Mr. Coldren confirmed that samples are being collected by a series of 4 grabs over a 10-hour shift and then composited per 40 CFR 136, with the exception of those parameters which require grab samples as noted in 40 CFF 403.12(g)(3).

The Inspection Team pointed out that federal regulations at 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.” The Facility representative could not provide any documentation to indicate the Region 3 had provided prior approval of grab samples or time-composite samples in lieu of flow-proportional sampling.

Closing Conference

After the Facility inspection, the Inspection Team met with the Facility representative for a closing conference and shared their preliminary observations. The Inspection Team reiterated to the Facility representative that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the Inspection Team upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference, as a result of reviewing additional documentation following the inspection.

During the closing conference, the Inspection Team asked that Facility representative provide the following additional documentation for review.

- 2022 Self-monitoring reports
- Most recent version of the TOMP

The 2022 SMRs were provided via email on 5/2/2024. The Inspection Team reviewed them and did not identify any concerns. The Facility still needs to confirm if TOMP has been updated from original submittal reviewed on-stie.

The inspection concluded at approximately 11:50 AM (EDT).