



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 01/19/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial User Inspection
Site/Facility Name: Rockwood Manufacturing
Site/Facility Address: 300 Main Street
Rockwood, PA 15557
Latitude: 39.91349 **Longitude:** -7916311
County/Parish: Somerset County
Permit Number: PAP124490
NAICS Code: 332510 **SIC:** 3429
Unique Project #: 3E23WN047A

Site/Facility Representative(s): Joe Morocco, EHS Manager **Point of Contact**
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EPA Inspector:

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Report Preparer	James Kline	Date
Signature/Date	NPDES Section	

Supervisor	Mark Zolandz, Acting Section Chief	Date
Signature/Date	NPDES Section	

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I. Introduction

On January 19, 2023, the United States Environmental Protection Agency, Region III (“EPA”), conducted an onsite Industrial User Pre-Treatment Inspection at Rockwood Manufacturing (hereinafter, “Rockwood”). The Facility is located at 300 Main Street in Rockwood, Somerset County, Pennsylvania (**See Attachment #1- Photo #1**). The purpose of the inspection was to observe compliance with the Pre-Treatment Regulations of the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The EPA is the control authority for the Facility. The U.S. EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). The PADEP did not have a representative present for the inspection. Inspector Kline provided the facility with advance notification of the inspection.

A. Opening Conference

Inspector Kline arrived at the facility on Thursday, January 19, 2023, at 10:00AM, and presented his credentials to Mr. Joe Morocco, EHS Manager. Inspector Kline conducted an opening conference. Attending were Inspector Kline and Mr. Morocco. Inspector Kline explained the purpose and scope of the inspection to Mr. Morocco.

Inspector Kline requested that any information that the Rockwood deemed to be confidential business information (“CBI”) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

B. Weather and Precipitation Conditions

During the inspection, the weather was raining with temperatures in the upper thirties (30s) degrees Fahrenheit.

II. Facility Activity

According to Mr. Morocco, raw metal products are purchased and transported to Rockwood; no metals are made at the facility. From these various metals, Rockwood designs and manufactures architectural door and entryway hardware for commercial applications. Operations at this 3.9-acre location date back to 1946. In 2008, ASSA ABLOY purchased Rockwood Manufacturing. Operations typically are from Monday through Friday from 6:00a.m. until 12:00a.m. midnight, covered in two shifts. Mr. Morocco stated there are no operations on weekends.

Inspector Kline asked Mr. Morocco to describe the plating operations, the pretreatment program, and identify all associated operations that contribute to discharges leaving the facility. Mr. Morocco proceeded to describe the Anodization, Chrome Plating and Oil-Rub line processes,

treatment, wastes generated, and tanks used. Inspector Kline requested a process flow diagram for each of the described processes. Mr. Morocco provided Inspector Kline the requested diagram (**See Attachment #2**).

Mr. Morocco conducts all diagnostic sample collection and coordinates sample analysis with Geochemical Testing, an independent 3rd party lab. During Inspector Kline's interview with Mr. Morocco, Mr. Morocco stated that the Discharge Monitoring Reports (DMRs) were within permit limitations and has not had any exceedances in the past five years.

Mr. Morocco stated Rockwood operates as an Industrial User (IU) under the NPDES Permit PA0024490 that was issued to the Borough of Rockwood Wastewater Treatment Plant. Inspector Kline requested Mr. Morocco provide a copy of the NPDES Permit (**See Attachment #3**). Inspector Kline observed that the permit was effective from July 1, 2014, and expired June 30, 2019. Inspector Kline asked if there was an NPDES Permit Renewal Application sent to the PADEP. Mr. Morocco provided a copy of the renewal application (**See Attachment #4**). According to this documentation, the renewal application was sent December 28, 2018.

According to Mr. Morocco, Rockwood is a small quantity generator (SQG) of hazardous waste. Mr. Morocco stated that Rockwood also has a state-issued Air Permit #OP56-00307.

III. Observations

Inspector Kline conducted a tour of Rockwood with Mr. Morocco. Inspector Kline was escorted throughout the facility. Included on the tour was the Plating Area (**See Attachment #1- Photo #2**), the final effluent sampling point (**See Attachment #1- Photos #3 & #4**), and the Pretreatment Area (**See Attachment #1- Photo #5**) including the wastewater sludge filter press (**See Attachment #1- Photo #6**). According to Mr. Morocco, Rockwood generates 150 pounds of hazardous secondary materials from the filter press per month. Mr. Morocco stated that all water from the filter press is sent back through the wastewater treatment process.

Inspector Kline was escorted to the Treatment Room. Inside this room is where the pH testing equipment, calibration logs and buffer solutions are kept. All items appeared to be in proper working order, and buffer solutions were within manufacturer's expiration dates.

IV. Records Review

In preparation for this inspection, Inspector Kline reviewed the Discharge Limitations and Monitoring Requirements (DLMR) for Rockwood (**See Attachment #5**). According to the DLMR, in lieu of Total Toxic Organics (TTO) monitoring, Rockwood has self-certified that no concentrated dumping of organic acids to wastewater has occurred. This self-certification has been submitted by Rockwood since 2003. Inspector Kline asked Mr. Morocco if Rockwood had

any additional information regarding the TTO or information related to a Toxic Organic Management Plan (TOMP). Mr. Morocco stated he would have to see if they had something and would provide whatever he found.

Prior to conducting the inspection, Inspector Kline also reviewed submitted semi-annual self-monitoring reports (SMRs) that Rockwood has provided to the EPA Region 3 since January 2019. While at Rockwood, Inspector Kline compared analytical reports and documents from the sampling events. Inspector Kline did not observe any exceedances or discrepancies. Mr. Morocco stated Rockwood is current with semi-annual reporting to the EPA and has not submitted any reports late. Mr. Morocco stated he could not recall the last time Rockwood had an exceedance and doesn't recall Rockwood having an exceedance since he has worked there.

Inspector Kline completed the Industrial User Checklist with input from Mr. Morocco (**See Attachment #6**).

V. Closing Conference

Inspector Kline conducted a closing conference with Mr. Morocco. Inspector Kline shared preliminary observations about the facility. Inspector Kline reiterated that all the preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference.

VI. Follow-up Communications

Inspector Kline received an e-mail from Mr. Morocco on 1/20/2023. In the e-mail, Mr. Morocco provided documentation sent to the EPA-Region 3 on September 11, 2003, regarding the TOMP (**See Attachment #7**).

VII. List of Attachments

Attachment 1: Photos

Attachment 2: Pretreatment Flow Diagram

Attachment 3: NPDES Permit

Attachment 4: NPDES Permit Renewal Application

Attachment 5: DLMR

Attachment 6: IU Checklist

Attachment 7: TOMP