

Pretreatment Compliance Audit

Summary Report

Discharger: Allegheny County Sanitary Authority (ALCOSAN)
Allegheny County
NPDES No. PA0025984

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Audit Dates: February 13-14, 2024

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Attachments

Attachment A	Industrial User Site Visit Data Sheets
Attachment B	Legal Authority Review Checklist
Attachment C	Pretreatment Program Status Update (PCA Form Attachment A)
Attachment D	Pretreatment Program Profile (PCA Form Attachment B)
Attachment E	EPA Memo on Split Samples

I. Audit Summary

Upon arrival, EPA contractors Chuck Durham, Sirese Jacobson, and Steve Geil, (jointly referred to as Audit Team), met with the Allegheny County Sanitary Authority (ALCOSAN) contacts Christina Dean, Michelle Buys, Doug Jackson, and Lisa Bruderly (Babst Calland, ALCOSAN Attorneys). The Audit Team discussed the purpose and format of the audit and interviewed the ALCOSAN representatives about ALCOSAN's pretreatment program. The Audit Team also evaluated ALCOSAN's procedures and legal authority.

As part of the audit, the Audit Team reviewed the following nondomestic discharger files:

- Aramark (non-categorical significant industrial user [SIU])
- Calgon Carbon (non-categorical SIU)
- Compunetics Incorporated (categorical industrial user [CIU] subject to Title 40 of the *Code of Federal Regulations* [40 CFR] 40 CFR 433.17, Metal Finishing Point Source Category, pretreatment standards for new sources)
- East Liberty (CIU subject to 40 CFR 413.14, Electroplating point source category, Subpart A Electroplating of Common Metals Subcategory, 413.24 Subpart B Electroplating of Precious Metals Subcategory, 413.44 Subpart D Anodizing Subcategory, 413.54 Coatings Subcategory, and 413.74 Electroless Plating Subcategory)
- Jersey Chrome (CIU subject to 40 CFR 433.15, Metal Finishing Point Source Category, pretreatment standards for existing sources)
- NexTech (CIU subject to 40 CFR 420.126, Iron and Steel Manufacturing Point Source Category, Subpart L – Hot Coating Subcategory, pretreatment standards for new sources)

As part of the audit, the Audit Team also conducted site visits at Aramark, Calgon Carbon, Compunetics, East Liberty, Jersey Chrome, and NexTech.

The last review of ALCOSAN's pretreatment program was a field audit inspection performed by Region 3 on June 29, 2016.

II. WWTP Description

ALCOSAN owns and operates a wastewater treatment plant (WWTP) in Allegheny County, Pennsylvania that serves 83 communities including 900,000 people.

The WWTP provides primary and secondary treatment which consists of bar screens, aerated grit chambers, primary sedimentation, secondary aeration, secondary clarifiers, disinfection, dechlorination, and sludge dewatering.

III. Industrial User (IU) Characterization

IUs currently identified by the Control Authority (CA)	IU Type	
57	Discharging Significant Industrial Users (SIU)	
	45	Discharging Non-Categorical SIUs (as defined by the CA)
	12	Categorical Industrial Users (CIUs)
	Not applicable (N/A)	Middle Tier CIUs

12	Zero-Discharging CIUs
0	Non-significant CIU (NSCIU)
39	Other Regulated IUs (e.g., permitted IUs) Describe: Groundwater Remediation, oil/water separators, IUs with flows less than 25,000 gpd.
3	Waste Haulers Describe: ALCOSAN accepts hauled septage waste at the WWTP. See Section H.1 of this report for more information.

IV. Findings Summary Table		
Part V Section Reference – Finding	Requirement(s)	Recommendation(s)
Finding C.4.a – The permits did not include adequate recordkeeping requirements.	1	
Finding C.4.b – The limits tables in the permits contained inaccurate footnotes.	2	
Finding C.4.c – The NexTech permit contains inapplicable monitoring conditions.		1
Finding C.4.d – The East Liberty Electroplating permit does not include all applicable Subparts under 40 CFR Part 413.	3	
Finding C.4.e – Some of the permits reviewed lacked an adequate description of the monitoring location.	4	
Finding C.4.f – The permit fact sheets did not reflect current permit conditions.		2 and 3
Finding C.4.g – The permits reviewed did not include requirements to notify ALCOSAN of bypasses.	5	
Finding D.2.a – The SUO does not define indirect discharge or discharge.		4
Finding D.2.b – The SUO is missing the requirement that IUs submit all monitoring data.	6	
Finding D.2.c – The SUO does not contain the civil penalty amount of at least \$1,000 per violation in the Civil Penalty section.		5
Finding F.1 – ALCOSAN was not conducting independent monitoring at Compunetics.	7	
Finding G.1 – ALCOSAN did not take enforcement for all SIU noncompliance.	8	
Calgon Carbon Site Visit Data Sheet – 55-gallon drums stored outside in poor condition.		6
Calgon Carbon Site Visit Data Sheet – The Audit Team observed raw material (carbon) in super sacks over drains that discharge to ALCOSAN.		7
East Liberty Electroplating Site Visit Data Sheet – The facility has instituted process wastewater filtration to reuse wastewater and decrease the volume discharged to		8

ALCOSAN.		
Jersey Chrome Site Visit Data Sheet – Housekeeping can be improved in process areas.		9
Compunetics Incorporated Site Visit Data Sheet – Compunetics was lacking proper chemical storage in multiple locations throughout the process areas.		10
Compunetics Incorporated Site Visit Data Sheet – Compunetics was not properly calibrating its pH probes.		11
Compunetics Incorporated Site Visit Data Sheet – Alcosan’s composite sampler onsite was not locked during compliance monitoring.		12
NexTech Site Visit Data Sheet – NexTech is not collecting compliance samples at the sampling locations designated in its discharge permit.		13
NexTech Site Visit Data Sheet –The Inspection Team observed an open container in the hazardous waste storage area.		14
Finding – The Audit Team observed an open container (55-gallon drum) in the hazardous waste storage area.		15
Aramark Site Visit Data Sheet – Aramark is not reporting all pH readings performed at the sampling point.		16
Aramark Site Visit Data Sheet – The pH buffers observed onsite were expired		17
Aramark Site Visit Data Sheet – The facility did not have proper chemical storage.		18

V. Evaluation
The Audit Team discussed the topics in subsections A-H regarding ALCOSAN's pretreatment program with the ALCOSAN representatives. The Audit Team also reviewed SIU files to assess the retention and maintenance of required program documents and to generally evaluate overall program implementation. The following sections describe program deficiencies and areas of concern identified during the audit process along with requirements, recommendations, and associated references to 40 CFR Part 403.
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) ALCOSAN's Sewer Use Ordinance (SUO) and Enforcement Response Plan (ERP) were both last revised and approved by the Board on April 22, 2021. EPA approved this revised SUO on September 9, 2021. ALCOSAN's most recent local limits reevaluation was approved by EPA on December 30, 2020.
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, ALCOSAN has individual agreements with 83 municipalities.
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)) The ALCOSAN representatives stated that they perform an industrial user survey every 3-4 years. ALCOSAN also reviews applications for construction of new industries as they come in. In addition, the collection system crew alerts the Industrial Waste department of anything unusual observed in the collection system. Based on the information received during the audit, ALCOSAN has identified and located all applicable industrial users.
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, ALCOSAN conducts annual inspections and semi-annual compliance monitoring at each SIU.
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 a SIU is a NSCIU, as defined in 403.3(v)(2), rather than a SIU? Have modifications to the list been submitted with annual reports? (40 CFR 403.8(f)(6))

Yes, ALCOSAN maintains a current list of SIUs, which it submits in the annual reports to EPA Region 3. ALCOSAN does not have NSCIUs and has not adopted that classification.

C. Control Mechanism Evaluation

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

ALCOSAN issues individual permits to SIUs and non-significant IUs. ALCOSAN had not issued any general permits at the time of the audit.

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

Contact info

Production processes

Types of wastes generated

Location for monitoring

Any request for waiver for pollutants not present per 40 CFR 403.12(e)(2)

N/A. ALCOSAN does not issue general control mechanisms.

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))

Involve same/substantially similar types of operations

Discharge the same type of waste

Same effluent limitations

Same or similar monitoring

There are no CIU production-based standards, CIU mass limits, combined wastestream formula, or net/gross calculations

N/A. ALCOSAN does not issue general control mechanisms.

4. Do both individual and general control mechanisms include the following, where applicable? (40 C.F.R. §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, best management practices (BMPs))
- d. Self-monitoring requirements
- e. Identification of pollutants to be monitored
- f. Sampling frequency
- g. Sampling locations/discharge points
- h. Appropriate sample types
- i. Reporting requirements

- j. Record-keeping requirements
- k. Statement of applicable civil and criminal penalties
- l. Compliance schedules
- m. Notice of slug loading or potential problems at POTW
- n. Notification of spills, bypasses, upsets, etc.
- o. Notification of significant change in discharge
- p. 24-hour notification of effluent violation
- q. Submit resampling results within 30-days
- r. Slug discharge control plan requirement, if required by POTW
- s. Certification statements
- t. Sampling/analysis requirements (Part 136 or alternative)
- u. Reporting of additional sampling
- v. 90-day compliance report

Findings regarding permit conditions are listed below.

Finding C.4.a – The permits did not include adequate recordkeeping requirements.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1)(iii)(B)(4) require that permits include record-keeping requirements. The federal regulations at 40 CFR 403.12(o)(2) require that records must be maintained for at least three years. Additionally, the retention period is extended during unresolved litigation or when requested by the [EPA] Regional Administrator.

Requirement 1

ALCOSAN is required to revise all SIU permits to specify that the records retention period is extended during any unresolved litigation or when requested by the ALCOSAN or EPA.

Finding C.4.b – The limits tables in the permits contained inaccurate footnotes.

Part A, Section 1 of the Compunetics permit includes the most stringent applicable limits between the local limits and 40 CFR 433.17. However, the footnotes are confusing. The footnote “***” is defined as “40 CFR 433.17, Pretreatment Standards for New Sources”; however, this doesn’t match up to the categorical standards listed within the table. The table also includes items with footnote “*****”; however, there is no such footnote defined below the table. Furthermore, footnote “*” is defined to indicate parameters where “local daily maximum limit more stringent than Federal daily maximum limit or no federal limit”; however, that is not true for copper and cyanide.

This same table in the NexTech permit suggests that the local limits are more stringent than the categorical limits; however, one is a concentration-based limit and the other is a mass-based limit. There is no documentation of comparison or conversion to show which is more stringent. This table also incorrectly lists the categorical limits as “pounds per day”. However, the applicable categorical limits at 40 CFR 420.126 are expressed as “pounds per 1,000 pounds of product”.

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.

Requirement 2

ALCOSAN is required to revise the permits to ensure that all applicable effluent limits are clearly stated.

Finding C.4.c – The permits reviewed contain permit conditions that are not applicable to the specific permittee.

For example, the NexTech permit contains template language on monitoring frequencies for SIUs and non-significant IUs that appears to be generic language that is repeated in other SIU permits. However, it is not applicable to the specific permittee and in the case of NexTech and conflicts with other more direct language regarding monitoring requirements.

Recommendation 1

It is recommended that ALCOSAN remove any generic or template language from SIU permits which is not applicable to the specific permittee.

Finding C.4.d – The East Liberty Electroplating permit does not include all applicable Subparts under 40 CFR Part 413.

The permit includes subcategories A and B. However, the facility also performs operations covered by subcategories D, E, and G. The facility has added filters onto the rinse tanks and has decreased the amount of process wastewater requiring treatment and discharge to the POTW. This revision will not impact the permit limits themselves but will provide an accurate reflection of applicable categorical standards.

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.

Requirement 3

ALCOSAN is required to revise the East Liberty Electroplating permit to ensure that all applicable effluent limits are clearly stated.

Finding C.4.e – Some of the permits reviewed lacked an adequate description of the monitoring location.

The permits reviewed specified general sampling locations; however, the description was not always detailed and may result in samples being taken that are not representative of the discharge or the location may not be recognized by personnel not familiar with the facility.

For example, the sampling location for Bristol Metals provided a specific location and states “Sampling Location: 001A – Sampling port located downstream of the pretreatment system”. For East Liberty Electroplating the sampling location was less specific and stated “Sampling Location: 001 – 01 – Vent Behind Sump”. It is not clear where the sump is located, therefore it is not clear where the vent is located.

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.”

Requirement 4

ALCOSAN is required to revise the permits to include a detailed description of the location for self-monitoring. A diagram or photograph of the location may also be included, in addition to or in place of a narrative description, to clarify the location.

Finding C.4.f – The permit fact sheets did not reflect current permit conditions.

The Compunetics and NexTech permit fact sheets state that the CIUs are authorized for time-proportional sampling, but do not provide sufficient rationale. Where ALCOSAN has approved time-proportional composite samples or grab samples in lieu of flow-proportional composite samples, ALCOSAN must document the rationale in the SIU’s file. As discussed during the closing, because ALCOSAN uses fact sheets for its SIUs, this would be the most logical location for documenting the rationale for allowing anything other than 24-hours flow proportional sampling.

In addition, the NexTech permit fact sheet does not include sufficient detail on application of the categorical standard and compliance assurance. The production rates were not included. Therefore, it is not clear what values are used for compliance determination (e.g., long-term average or daily production data from the date of the sampling event).

Fact sheets provide the mechanism for describing how specific limits are determined to be applicable for a specific permittee, as well as documenting the rationale for how other permit requirements or conditions were developed. Based on the subset of files reviewed as part of this audit, the fact sheets are currently very basic and do not provide the rationale for permit 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.”

Furthermore, the federal regulations at 40 CFR 403.12(g)(3) require grab samples for “pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 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 ALCOSAN. 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.”

Recommendation 2

It is recommended that ALCOSAN update the permit fact sheets to include rationale for authorized time-proportional composite samples and a description of how permit limits were determined to be applicable.

Recommendation 3

For those CIUs subject to production-based limits, it is recommended the fact sheets be amended to specify how compliance with the limits are to be assessed (using daily production data vs long-term average production data).

Finding C.4.g – The permits reviewed did not include requirements to notify ALCOSAN of bypasses.

Regulatory Requirement.

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

Requirement 5

ALCOSAN is required to revise the permits to include the requirement for the SIUs to notify ALCOSAN of bypasses.

D. Legal Authority

1. Has the CA amended its pretreatment program to include the streamlining provisions?

ALCOSAN’s SUO includes the required streamlining provisions and some of the optional streamlining provisions.

2. Does the SUO provide the control authority adequate legal authority, consistent with 40 CFR 403.8(f)(1)?

As a component of this PCA, the Audit Team compared the SUO with the provisions of 40 CFR Part 403 (see Attachment B, Legal Authority Review Checklist). The following deficiencies and inconsistencies were observed within the SUO.

Finding D.2.a – The SUO does not define indirect discharge or discharge.

Recommendation 4

It is recommended that ALCOSAN include the definition of indirect discharge/discharge in its SUO. The definition in the federal regulations at 40 CFR 403.3(i) is “Indirect discharge or discharge means the introduction of pollutants into a POTW from any non-domestic source regulated under section 307(b), (c) or (d) of the Act.”

Finding D.2.b – The SUO is missing the requirement that IUs submit all monitoring data.

The regulations at 40 CFR 403.12(g)(6) state “If an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, the results of this monitoring shall be included in the report.”

Requirement 6

ALCOSAN is required to revise its SUO to include this requirement.

Finding D.2.c – The SUO does not contain the civil penalty amount of at least \$1,000 per violation in the Civil Penalty section.

Section 4.2.5(k) of the SUO, pertaining to IU permit contents states that IU permits will contain “A statement of applicable penalties including civil penalties of up to \$25,000 per violation per day and/or criminal penalties of not more than \$1,000 per violation and/or imprisonment of not more than 90 days per violation per day.” However, section 6.5, Civil Penalty does not mention \$1,000 per 40 CFR 403.8(f)(1)(vi) and states “the Pretreatment Coordinator may assess a civil penalty in an amount not to exceed \$25,000.00 per violation per day against a IU...”

Recommendation 5

It is recommended that ALCOSAN, during the next SUO revision, modify Section 6.5 ‘Civil Penalties’ to include the \$1,000 minimum amount for violations rather than having conflicting language with Section 4.2.5(k).

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

Yes, as noted in A.2 above, ALCOSAN receives wastewater from 83 municipalities. ALCOSAN has individual agreements with each municipality.

**4. What is the control authority’s definition of SNC?
(40 CFR 403.8(f)(2)(viii))**

The definition of SNC in ALCOSAN’s SUO mirrors the federal definition.

E. 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, ALCOSAN has generally applied all applicable pretreatment standards to its SIUs. However, as noted in Finding C.4.d above, the East Liberty Electroplating permit does not include all Subparts under 403 CFR 413 applicable to the permittee.

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

According to the ALCOSAN representatives, all SIUs are required to develop and implement a slug discharge control plan.

F. 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))

Based on the files reviewed and the responses from the ALCOSAN representatives during the interview, all SIUs are sampled and inspected at least once a year.

Finding F.1 – ALCOSAN was not conducting independent monitoring at Compunetics.

During the site visit at Compunetics, the Audit Team observed ALCOSAN's composite sampler actively collecting composite samples; however, the sampler was not locked. The Audit Team informed the ALCOSAN inspectors that by not placing an ALCOSAN lock on the sampler, ALCOSAN does not have control over the sampler, and this is not considered independent monitoring. During the closing conference, the ALCOSAN representatives indicated that their typical procedure is to lock the composite samplers.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(2)(v) require ALCOSAN to "[r]andomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year."

Requirement 7

ALCOSAN is required to conduct independent monitoring at each SIU and ensure sampling equipment cannot be altered in any way that could impact the results of sample collection or analysis.

- 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), 40 CFR 403.12(g)(5))

Yes, according to the information reviewed during the inspection, ALCOSAN uses proper inspection procedures. As noted in Finding F.1 above, ALCOSAN failed to ensure that independent compliance monitoring was conducted at all SIUs.

- 3. Has the CA kept records for three years including the following?**

- 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

(40 CFR 403.12(o))

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

representatives stated that they maintain active files for 3-5 years and archive files for 10 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. ALCOSAN was not implementing the option to classify industries as NSCIUs at the time of the audit.
5. Has the CA required, received, and analyzed reports and other notices from SIUs? 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 j. (40 CFR 403.8(f)(2)(iv)) Based on the files reviewed during the inspection, ALCOSAN has been adequately requiring, receiving, and analyzing required reports.
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 demonstrated continued compliance and re-sampled within 30 days 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)) Yes, based on the file reviewed, CIUs have reported on regulated pollutants at least once every 6 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 403.12(h) & (g)(1)) Yes, based on the files reviewed, ALCOSAN has ensured that SIUs self-monitor and report at least once every 6 months in accordance with their permit monitoring requirements.
9. Has the CA required self-monitoring reports from CIUs to be signed and certified? (40 CFR 403.12(b)(6), 403.12(l))

Yes, the CIU self-monitoring reports in the file reviewed were signed and certified.
10. Has the CA received notification of hazardous waste discharges? (40 CFR 403.12(j) & (p)) No. Based on the files reviewed during the audit and discussion with ALCOSAN representatives, no hazardous waste discharge notifications were received, nor was there an indication that such notifications should have been received.
11. Does the CA accept electronic reporting? (40 CFR 403.8(g) and 40 CFR Part 3) No. According to the ALCOSAN representatives, SIUs are allowed to submit reports electronically to meet a deadline, but must follow up with submittal of a hard copy.
G. Enforcement
1. Has the CA implemented its enforcement response plan (ERP)? (40 CFR 403.8(f)(5)) ALCOSAN's ERP was last revised in 2021 in conjunction with revisions to the SUO. <u>Finding G.1 – ALCOSAN did not take enforcement for all SIU noncompliance.</u> Both East Liberty Electroplating and NexTech made changes to their operations but failed to notify the Control Authority as required by their respective discharge permits and the federal pretreatment regulations. These changes were discovered during the site visits conducted as part of this audit. In addition, during the site visit, it was discovered that NexTech had moved their sample location (as discussed in the site visit write-up in Attachment A) without proper notification to ALCOSAN. In each case, the process changes made resulted in reduced pollutant loading to the POTW however the lack of proper notification of changes was not identified or addressed. <u>Regulatory Requirement</u> The federal regulations at 40 CFR 403.8(f)(5) require that the POTW develop and implement an ERP. This plan shall contain detailed procedures indicating how the POTW will investigate and respond to instances of industrial user noncompliance. <u>Requirement 8</u> ALCOSAN is required to ensure that it is properly implementing its ERP in response to industrial user noncompliance.
2. Does the County's ERP contain the minimum elements required by 40 CFR 403.8(f)(5)? As a component of this PCA, the Audit Team compared the ERP with the provisions of 40 CFR Part 403. The Authority's ERP, updated 4/22/2021, contains all required elements at 40 CFR 403.8(f)(5).

3. 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, ALCOSAN evaluates numeric and narrative criteria for SNC. ALCOSAN did not have to publish any users in SNC in 2022. The last publication occurred on April 1, 2021 in <i>The Pittsburgh Courier</i>. 3a. Were any SIUs in SNC in the past year? Include name of industry, type of SNC, and current compliance status. ALCOSAN did not have any SIUs in SNC from January 2022 – June 2023.
4. Has the CA developed IU compliance schedules? (40 CFR 403.8(f)(1)(iv)(A)) Yes. According to the ALCOSAN representatives, ALCOSAN has the authority to issue compliance schedules and schedules were included in some of the permits reviewed. For example, the Compunetics permit included a compliance schedule for the facility to develop a slug discharge control plan.
5. 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. ALCOSAN did not identify any new CIUs or CIUs subject to a new categorical standard since the last PCA. There have no new categorial standards promulgated in recent years.
6. 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 Audit Team did not review baseline monitoring reports or 90-day compliance reports as part of the audit.
H. Additional Evaluations
1. Hauled Waste ALCOSAN receives hauled septage waste from three haulers. These haulers are issued a l-year permit through the Industrial Waste’s Pretreatment Program. ALCOSAN does not require a manifest with each load, but collects data on the truck amount. ALCOSAN collects a sample from every load and analyzes the sample for percent solids. The haulers discharge at a designated discharge point. ALCOSAN does not accept grease waste. 2. Dental Mercury Program At the time of the audit, ALCOSAN had identified 221 dental facilities and had received one-time compliance reports from approximately 50 percent of facilities.

3. Inspection Procedure Feedback

ALCOSAN inspectors observed during the PCA site visits appeared familiar with their respective SIUs. Site Visits began with an opening conference where lead inspectors went through the inspection checklist, requested documents, and asked about planned changes. The inspectors requested manifests and self-monitoring reports to review during opening conferences as well. During the Exit Interview, the Audit Team did recommend the ALCOSAN inspectors implement the practice of requesting the IU representative produce a copy of the permit, SDCPs, and any applicable pollutant management documents.

4. Split Samples

During the Closing Conference, the Audit Team and ALCOSAN representatives engaged in a discussion on split samples. When asked if split sample results are averaged, ALCOSAN personnel indicated the practice at that time had been to count the two results as separate sample results. The Audit Team pointed out that, provided the sample was collected at a designated sample point and each of the split samples is analyzed using 40 CFR Part 136-approved methods, the two results should be averaged for the purpose of assessing compliance for the singular sampling event. An electronic copy of the 1992 EPA memo that addresses split samples and compliance assessment was provided while on-site and one has been included in this report as Attachment E.

Attachment A

Industrial User Site Visit Data Sheets

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Calgon Carbon					
Address of industry: 200 Neville Road Pittsburgh, PA 15225					
Date of visit: February 13, 2024			Time of visit: 1:15 PM		
Name of inspector(s): Ronald Stevenson, ALCOSAN; Steve Geil, ERG					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Jake Napoli		Plant Manager		jake.napoli@kuraray.com	
Dave McAdams		Regional EHS		david.mcadams@kuraray.com	
IU Permit Number: P2-0128		Exp. Date: 30 September 2025		IU Classification: SIU	
Please provide the following documentation:					
1. Nature of operation: Reactivation of spent granular activated carbon and impregnation of unused activated carbon. The plant was built in the early 1940s. Spent carbon is received, typically blended, and reactivated in the reactivation furnace (high temperature, no oxygen environment). This drives off the compounds in the carbon. The carbon is then pulverized and bagged as product for shipment.					
2. Number of employees	75	Number of shifts:	2	Hours of operation:	24 hours a day/7 days a week
3. Wastestream flow(s) discharged to the POTW: 7,500 gallons per day of well and city water. Water is used for cooling, boilers, and sanitary. Cooling water is reused in the process.					
Sanitary:	1,500 gpd	Process:	500 gpd	Combined:	2,000 gpd
4. Describe any current or planned significant changes in process or flow: None					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): None.					
X	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used):					
Impregnation system uses ammonia. Ammonia emissions are controlled using a dry scrubber and distillation column. The blow down contains ammonia along with suspended and dissolved solids. Baghouse dust and off spec material are disposed in a non-hazardous landfill. Well water undergoes desalinization prior to use. The blow down from desalinization is discharged to the sewer.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Operations were taking place in the chemical storage area at the time of the inspection, so it was only observed from the exterior. This is a separate, small building.					
Any floor drains?		No		Any spill control measures?	
				Yes	

8. Are hazardous wastes drummed and labeled? Yes
9. Does the IU have hazardous waste manifests? Yes
10. Solid waste production and disposal: Could not view manifests. Office was locked where manifests are stored.
11. Description of sample location and methods: Single outdoor manhole where sampling occurs.
Notes:
Housekeeping issues primarily. <u>Finding</u> – 55-gallon drums stored outside in poor condition. <u>Recommendation 6</u> It is recommended that ALCOSAN follow up with Calgon Carbon to require any drums stored inside or outside should be properly labeled and in good condition. Any drum storing chemicals should be stored indoors, properly segregated, and properly labeled. <u>Finding</u> – The Audit Team observed raw material (carbon) in super sacks over drains that discharge to ALCOSAN. <u>Recommendation 7</u> It is recommended that ALCOSAN follow up with the facility to ensure that no materials are stored over drains that have the potential to discharge to ALCOSAN or to the Allegheny River.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: East Liberty Electroplating					
Address of industry: 1126 Butler Plank Road Glenshaw, PA 15116					
Date of visit: February 14, 2024			Time of visit: 1:00 pm		
Name of inspector(s): Mindy Binek, Ronald Stevenson Steve Geil, ERG					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Jared Bugel		Vice President		412-487-4080	
IU Permit Number: P1-0010		Exp. Date: March 31, 2025		IU Classification: CIU	
Please provide the following documentation:					
1. Nature of operation: Metal finisher that does zinc plating, chromating, chrome plating, anodizing, and electroless nickel. Facility only does trivalent chromium plating and no longer does any hexavalent chromium plating.					
2. Number of employees	15-18	Number of shifts:	1	Hours of operation:	6:00 am – 4:00 pm Monday – Thursday
3. Wastestream flow(s) discharged to the POTW: Metal finishing wastewater.					
Sanitary:	360 gpd	Process:	See below	Combined:	Not measured since implementing flow reduction filtration
4. Describe any current or planned significant changes in process or flow: Have installed filtration on rinse tanks and decreased the volume of process wastewater discharged. Using regular pool filters, clean based on pressure differential (hose off filter, water goes to treatment, filter is reinstalled).					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): Chemical precipitation system consisting of: pH adjustment, coagulation and flocculation, clarification (lamella clarifier), plate and frame filter press.					
X	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): Job shop metal plater and anodizer. Primarily zinc plating but also performs electroless nickel plating, chromating, as well as anodizing. Material arrives and is processed manually or in an automated plating line depending on the product requirements.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Chemicals are labeled, segregated, and stored.					
Any floor drains?		No		Any spill control measures?	
				Yes	
8. Are hazardous wastes drummed and labeled? Yes					
9. Does the IU have hazardous waste manifests? Yes					
10. Solid waste production and disposal: F006 has decreased as a result of the filtration and decrease in wastewater requiring treatment.					

11. Description of sample location and methods: Sample location is in the wastewater treatment area.

Notes:

Finding – The facility has instituted process wastewater filtration to reuse wastewater and decrease the volume discharged to ALCOSAN.

Recommendation 8

It is recommended that ALCOSAN require the facility perform a flow balance around the plating rinse tanks to determine the volume of water being reused and the volume being discharged to wastewater treatment and ultimately to ALCOSAN. A full description of the filtration system should be provided to ALCOSAN for subsequent inspections and permits.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Jersey Chrome Plating					
Address of industry: 144 46th Street Pittsburgh, PA 15201					
Date of visit: February 14, 2024			Time of visit: 2:00 pm		
Name of inspector(s): Alecia Miller, Ronald Stevenson					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Alan Jersey		President		412-681-7044	
IU Permit Number: P1-0056		Exp. Date: 3/31/2025		IU Classification: zero-discharge CIU – 433.17	
Please provide the following documentation:					
1. Nature of operation: Hexavalent chromium plater.					
2. Number of employees	9	Number of shifts:	1	Hours of operation:	7:00 am – 4:30 pm
3. Wastestream flow(s) discharged to the POTW: No discharge of process wastewater.					
Sanitary:	180 gpd	Process:	0 gpd	Combined:	180 gpd
4. Describe any current or planned significant changes in process or flow: None					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): None, no discharge of process wastewater.					
NA	Continuous flow	NA	Batch	Combined	
6. Process area description (identify raw materials and processes used): Comprised of 3 buildings: Building 1 – Hard chrome finishing (hexavalent chromium) Building 2 – Sand blasting, polishing, cleaning (with acetone) Building 3 – Machine shop, grinding					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Chemicals are stored in work areas and consist mainly of cleaning and machining chemicals. Housekeeping is an issue at the facility, it is noted that the operations are occurring in multiple buildings located in a residential area.					
Any floor drains?	No	Any spill control measures?	Yes		
8. Are hazardous wastes drummed and labeled? Ship chrome bath solution.					
9. Does the IU have hazardous waste manifests? Yes, to be provided to ALCOSAN. Have not shipped any wastes in a number of years.					

10. Solid waste production and disposal: Limited, use INMETCO
11. Description of sample location and methods: None
Notes:
<u>Finding</u> – Housekeeping can be improved in process areas. <u>Recommendation 9</u> It is recommended that ALCOSAN review housekeeping during inspections and also make note of whether all chemicals are segregated and stored in proper storage areas.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Compunetics Incorporated					
Address of industry: 700 Seco Road, Monroeville, PA 15146					
Date of visit: February 14, 2024			Time of visit: 9:12 am – 10:38 am		
Name of inspector(s): Ronald Stevenson, Natalie Cianca, Debbie Joyce, and Robin McRoberts (ALCOSAN) Chuck Durham and Sirese Jacobson (Eastern Research Group)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Paul Dolinsky		Waste Treatment Operator		724-732-8154	
Melissa Stoner		Environmental Compliance Specialist		Not provided	
IU Permit Number: P1-0006		Exp. Date: March 31, 2025		IU Classification: CIU subject to 40 CFR 433.17	
Please provide the following documentation:					
1. Nature of operation: The facility manufactures printed circuit boards. It does not populate the boards, but it makes the actual boards for multiple sectors, including colleges, aerospace, defense, and communications.					
2. Number of employees	50	Number of shifts:	2	Hours of operation:	6:30 am – 11:00 pm, Monday-Friday (every other week have Friday off)
3. Wastestream flow(s) discharged to the POTW: Process wastewater is generated from the rinse tanks associated with the process lines. The facility has approximately 15 rinse tanks throughout the process areas.					
Sanitary:		Process:		30,000 gpd	Combined:
4. Describe any current or planned significant changes in process or flow: None.					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): Rinse waters are pumped to the 1,500-gallon influent tank for pH adjustment using sodium hydroxide and sulfuric acid. Wastewater is then pumped to the 3-column ion exchange system (primary, secondary, and polish) and then to the filtration system where metals are extracted. Wastewater then enters the 2,000-gallon effluent tank for final pH adjustment prior to being discharge to the POTW.					
Continuous flow		x	Batch		Combined
6. Process area description (identify raw materials and processes used): Boards (fiberglass, copperclad) are punched and then go to the ‘plate through’ line. Some parts then go to the ENIG (electroless nickel and immersion gold) line.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): Sodium hydroxide, sulfuric acid, various solvents and plating solutions.					
Any floor drains?	Yes, in process area, but all are plugged. No drains in hazardous waste storage area.		Any spill control measures?		Pigs, socks, and pillows
8. Are hazardous wastes drummed and labeled? Ammonia etching and hydrochloric etch waste are hauled offsite by Photochemicals.					

World Resource hauls offsite tin strip and sludge from the in-house batch treatment. Enviroserve hauls off anything else and hauls hazardous waste offsite.
9. Does the IU have hazardous waste manifests? Yes. Use Miller, Safety Kleen, and Enviroserve for off-site disposal.
10. Solid waste production and disposal: sludge filter cake, general refuse.
11. Description of sample location and methods: Sample point is the weir box in room 115 of the production building.
Notes:
The facility has a slug control plan. <u>Finding – Compunetics was lacking proper chemical storage in multiple locations throughout the process areas.</u> The Audit Team observed multiple areas where chemicals were stored without proper secondary containment and where incompatible chemicals were stored adjacent to one another without secondary containment. <u>Recommendation 10</u> It is recommended that ALCOSAN follow up with the facility to ensure that chemicals are properly stored, including with adequate secondary containment and segregation, where applicable. <u>Finding – Compunetics was not properly calibrating its pH probes.</u> Based on discussions with the facility representatives, the facility uses a two-point calibration using pH 4 and 7 buffer solutions. However, the facility representative also noted that the upper pH range of the facility’s discharge is approximately 7.4. Therefore, the facility should be performing a three-point calibration using pH 4, 7, and 10 buffer solutions to fully capture the pH range of the facility’s discharge. <u>Recommendation 11</u> It is recommended that ALCOSAN follow up with the facility to ensure that it is properly calibrating its pH probes. <u>Finding – Alcosan’s composite sampler onsite was not locked during compliance monitoring.</u> <u>Recommendation 12</u> It is recommended that ALCOSAN lock its composite sampling when collecting compliance samples at its SIUs to ensure that it is collecting independent samples.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: NexTech dba Steel Dynamics					
Address of industry: 300 Braddock Avenue, Turtle Creek, PA 15145					
Date of visit: February 14, 2024		Time of visit: 11:04 am - 12:10 pm			
Name of inspector(s): Matt Carver, Debbie Joyce, and Ronald Stevenson (Alcosan) Chuck Durham and Sirese Jacobson (Eastern Research Group)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Jason Gerendash		NT Maintenance Engineer		412-368-4833 jason.gerendash@steeldynamics.com	
Julie Matics		Plant Manager		412-368-4905 Julie.matics@steeldynamics.com	
Gina McKinney		Safety Coordinator		260-868-8133 gina.mckinney@steeldynamics.com	
Clay Spangler		Operations Manager		412-368-4834 clay.spangler@steeldynamics.com	
Emily Day		Facility consultant, Civil and Environmental Consultants		Not provided	
IU Permit Number:		Exp. Date: 03/31/2025		IU Classification: 40 CFR 420.126	
Please provide the following documentation:					
1. Nature of operation: Intermediate steel coater using hot-dip galvanizing.					
2. Number of employees	57	Number of shifts:	Not determined (ND)	Hours of operation:	ND
3. Wastestream flow(s) discharged to the POTW: The only discharge process wastewater is non-contact cooling water and boiler blowdown.					
Sanitary:		Process:		1,500 gpd	Combined:
4. Describe any current or planned significant changes in process or flow: None.					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): Treatment consists of pH adjustment as needed.					
x	Continuous flow			Batch	Combined
6. Process area description (identify raw materials and processes used): Raw material is cold-rolled steel that comes in coils. The coils are unrolled and moved through at a furnace at 880 degrees Fahrenheit for annealing. From the furnace the material then goes into a liquid zinc bath (hot dip coating) and then air-cooled. The work material then goes through light rolling mill before being re-coiled. The coils are then packaged for shipping.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): The facility was storing chemicals such as totes of phosphoric acid solution in the room next to Door 5. No floor drains are in the chemical storage areas or manufacturing area, but there is a storm drain just outside of Door 5.					
Any floor drains?		No		Any spill control measures?	Secondary containment. No reportable spills in last 5 years.

8. Are hazardous wastes drummed and labeled? Yes. The facility was storing two IBC totes of chromic acid hazardous waste in the room next to Door 5.
9. Does the IU have hazardous waste manifests? The facility generates hazardous waste, including chromic acid waste. Hazardous waste is shipped offsite monthly by Safety Kleen.
10. Solid waste production and disposal: Everything goes offsite.
11. Description of sample location and methods:
Valve after Chemical Treatment and Before Cooling Tank as specified by permit. The facility, as noted below, does not collect samples for self-monitoring at this location.

Notes:

The facility does not have a slug control plan.

Finding – NexTech is not collecting compliance samples at the sampling locations designated in its discharge permit.

During the opening conference, NexTech representatives noted that the IU does not collect their samples at the designated sample point in the permit. The permittee's consultant noted that this has been practice for more than 3 years. After the inspection, ALCOSAN officials stated they have never been made aware of this change in sampling location on the part of the IU and have not taken any enforcement for failure to sample at the designated sample point. The inspection team performed an extensive file search and found evidence from 2009 and 2014 that supported the idea that the current sample location utilized by the IU would be representative of the discharge. However, that does not negate the fact they are non-compliant with the permit on 2 counts (failure to notify of a change and failure to monitor at designated point). The Audit Team found floor schematics in both the 2009 and 2014 ALCOSAN annual inspection reports that were almost identical. However, the 2009 schematic showed a quench/rinse bath following the hot-dip coating which produced a process discharge which was captured at the permit designated sample point. In 2014, that quench/rinse bath was not present (nor was it during the inspection performed as part of this audit) and the IU now uses a non-contact cooling conveyor system, therefore no process water discharge. The only discharge is from the chilling tower used to cool the rollers in the non-contact conveyor system. The IU samples at the outlet of the chilling tower out of easier access. ALCOSAN continues to sample inside the facility at the designated sample point.

Recommendation 13

It is recommended that ALCOSAN personnel investigate further to determine the appropriate sample location for this facility and modify the permit accordingly.

Recommendation 14

It is recommended that ALCOSAN re-evaluate the classification of this facility given the information provided during the site visit. This facility is not discharging any regulated wastestreams and has not for at least 3 years.

Finding – The Audit Team observed an open container (55-gallon drum) in the hazardous waste storage area.

Recommendation 15

It is recommended that that ALCOSAN follow-up with NexTech to ensure that all chemicals are properly stored and capped or closed when not in use in an effort to avoid spills or accidental discharge.

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Aramark					
Address of industry: 6640 Frankstown Ave., Pittsburgh, PA 15206					
Date of visit: February 15, 2024			Time of visit: 9:30 am – 10:52 am		
Name of inspector(s): Ronald Stevenson, Mindy Binek (ALCOSAN) Chuck Durham and Sirese Jacobson (Eastern Research Group)					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/Email	
Herbert Hines		Plant Maintenance Manager		724-290-3709 hines-herbert1@aramark.com	
IU Permit Number: P2-0022		Exp. Date: 9/30/2025		IU Classification: non-categorical SIU	
Please provide the following documentation:					
1. Nature of operation: The facility is a uniform service that launders napkins, tablecloths, rugs, and some shop rags. The facility processes 20,000-25,000 pounds of laundry/day, has 6 washers and 3 dryers, and has a fleet of 23 delivery trucks.					
2. Number of employees	50	Number of shifts:	1	Hours of operation:	6:00 am – 4:00 pm, Monday-Friday
3. Wastestream flow(s) discharged to the POTW: Wastestreams discharged to the POTW include wash water from the washers which may contain soap, bleach, and other cleaning chemicals.					
Sanitary:	4,000 gpd	Process:	38,000 gpd	Combined:	
4. Describe any current or planned significant changes in process or flow: None.					
5. Type of pretreatment system (Describe treatment processes, condition of systems, and deficiencies observed): Wastewater from the process enters a pit and then is pumped to an oil/water separator. Wastewater then goes through a sieve screen to remove lint before being pumped to a 30,000-gallon holding tank. Wastewater from the holding tank is pumped to a Dissolved Air Flotation (DAF) unit, and wastewater enters another 30,000-gallon holding tank before being pumped to carbon pump and filter system, through carbon tanks, and then to the discharge point.					
x	Continuous flow		Batch		Combined
6. Process area description (identify raw materials and processes used): Facility processes 20-25,000 pounds of laundry per day. Dirty laundry comes in to sorting area, then goes to wash area and dryers, and then to folding and shipping. There are 6 washers and 3 dryers. There are four 400-lb washers, one 1,000-lb washer, and one 150-lb washer.					
7. Chemical storage area (identify the chemicals that are maintained on-site, housekeeping, and storage): The inspection team observed acids and caustics stored near the treatment system without proper segregation or secondary containment, as noted in Finding 3 below.					
Any floor drains?	No	Any spill control measures?	Secondary containment in the process area consists of spill kits throughout the facility, as		

			well as socks, pads, and floor-dry. Any spill-related water that is collected is pumped into the dirty water holding tank and then through the treatment system.
8. Are hazardous wastes drummed and labeled? Yes.			
9. Does the IU have hazardous waste manifests? Yes.			
10. Solid waste production and disposal: Sludge accumulated in treatment pit is pumped out and hauled offsite by Insight. Other solids wastes, non-hazardous wastes, and general wastes are picked up by Waste Management for off-site disposal.			
11. Description of sample location and methods: The sampling point is located in the tool crib.			
Notes:			
The facility has a slug control plan. <u>Finding – Aramark is not reporting all pH readings performed at the sampling point.</u> Based on discussion with the facility representative, they are monitoring and recording pH at the designated sampling point every day but are only submitting results for their samples taken once per quarter for their self-monitoring reports. <u>Recommendation 16</u> It is recommended that ALCOSAN follow up with the facility to ensure results from all sampling performed at the designated sample point used 40 CFR Part 136 approved methods are being submitted to ALCOSAN. <u>Finding – The pH buffers observed onsite were expired.</u> The Audit Team observed that the facility's pH 4, 7, and 10 buffers solutions used to calibrate its pH probe were expired. <u>Recommendation 17</u> It is recommended that ALCOSAN follow up with the facility to ensure that it is using unexpired pH buffers to calibrate its pH probe. <u>Finding – The facility did not have proper chemical storage.</u> The Audit Team observed three chemical drums of caustic stored adjacent to a drum of sulfuric acid without secondary containment in an outside area near the wastewater treatment building. <u>Recommendation 18</u> It is recommended that ALCOSAN follow-up with the facility to ensure proper segregation of incompatible chemicals.			

Attachment B

Legal Authority Review Checklist

CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: Allegheny County Sanitary Authority
 DATE OF REVIEW: March 2024

Note: Several changes to the National Pretreatment Regulations made as a result of the Streamlining Rule are more stringent than the previous Federal requirements and therefore are considered required modifications for the POTW. Therefore, to the extent that existing POTW legal authorities are inconsistent with these required changes, they must be revised. Where local authorities are already consistent with these required provisions, further changes are not necessary.

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A	√			1.3(1)	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C	√			1.3(4)	
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E	√			1.3(5)	
4. Categorical Pretreatment Standard or Categorical Standard		§ 1.4 F	√			1.3(19)	
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M			√	---	Not defined per 403.3(j)
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL	√			1.3(15)	
7. Interference	403.3(k)	§ 1.4 O	√			1.3(16)	
8. National Pretreatment Standard, Pretreatment Standard or Standard	403.3(l)	§ 1.4 BB	√			1.3(19), 1.3(31)	
9. New Source	403.3(m)	§ 1.4 T	√			1.3(21)	
10. Pass Through	403.3(p)	§ 1.4 V	√			1.3(23)	
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA	√			1.3(30)	
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD	√			1.3(32)	
13. Significant Industrial User <i>[NOTE: §1.4 GG(3) is an optional streamlining provision for Non-Significant Categorical Industrial</i>	403.3(v)	§ 1.4 GG	√			1.3(15)(c)	

<i>User classification.</i>							
14. Significant Noncompliance	403.8(f)(2)(vii)	§ 9 (A-H)	√			Section 7	

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH	√			1.3(34)	
16. Other definitions based on terms used in the POTW Ordinance							
B. National Pretreatment Standards – Prohibited Discharges							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A	√			2.1	
b. Pass Through	403.5(a)	§ 2.1A	√			2.1	
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60° C or 140° F flashpoint)	403.5(b)(1)	§ 2.1B(1)	√			2.1(a)(1)	
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)	√			2.1(c)	
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)	√			2.1(g)	
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)	√			2.1(i)	
e. Heat; exceeds 40° C (104°F)	403.5(b)(5)	§ 2.1B(5)	√			2.1(e)	
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)	√			2.1(k)	
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)	√			2.1(h)	
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)	√			2.9	

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REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2	√			2.2	
4. Local Limits Development <i>[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]</i>	403.5(c) & (d)	§ 2.4	√			2.4	
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6	√			2.7 4.8(m)	
6. Best Management Practices Development <i>[NOTE: Optional streamlining provision.]</i>	403.5(c)(4)	§ 2.4C				---	Does not meet 403.5(c)(4) but not required.
C. Control Discharges to POTW System							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2	√			2.6 4.2.3	
2. Individual Control Mechanism (e.g., permit) to ensure compliance - <i>Permit Content</i>	403.8(f)(1)(iii)	§ 4.2	√			4.2	
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)	√			4.2.6	
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§5.2A(2)	√			4.2.8	
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)	√			4.2.5(a)	

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REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
d. Best Management Practices <i>[Note: This is a required streamlining provision for CIUs with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, then this provision would be optional and is only required if the POTW has incorporated the use of BMPs (§ 2.4 C).]</i>	403.8(f)(1)(B) (3)	§ 5.2A(3)	√			4.2.5(f)	
e. Self-Monitoring Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)	√			4.2.5(e)	
f. Reporting & Notification Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)	√			4.2.5(f)- (g)&(i)	
g. Recordkeeping Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)	√			4.2.5(h)	
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B o the Model SUO.]</i>	403.8(f)(1)(B) (4) & 403.12(e) (2)	§ 5.2A(5)	√			4.2.5(n) 4.3.4(e)	
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B) (5)	§ 5.2A(7)	√			4.2.5(k)	
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. Where the POTW has determined that slug controls are necessary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]</i>	403.8(f)(1)(B) (6)	§ 5.2A(8)	√			4.2.5(j)	

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
k. Specific waived pollutant <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B) (4)	§ 5.2A(9)	√			4.2.5(n) 4.3.4(e)	
l. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7	√			4.22 4.24	
m. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4	√			4.2.7 5.7	
n. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8	√			4.8	
o. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1	√				
p. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7	√			6.4	
q. Requirement to submit Chain-of-Custody forms with monitoring data <i>[Note: Optional permit provision]</i>			√				
3. General Control Mechanism to ensure compliance <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated the use of General Permits (§ 4.6 of the Model SUO).]</i> - Permit Content	403.8(f)(1)(iii) (A)	§ 4.2 & 4.6					ALCOSAN does not use General Permits
a. Statement of Duration	403.8(f)(1)(B) (1)	§§ 5.1 & 5.2A(1)					
b. Statement of Nontransferability	403.8(f)(1)(B) (2)	§ 5.2A(2)					

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
c. Effluent Limits	403.8(f)(1)(B) (3)	§ 5.2A(3)					
d. Best Management Practices <i>[Note: This is a required streamlining provision for CIUs with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, then this provision would be optional and is only required if the POTW has incorporated the use of BMPs (§ 2.4C).]</i>	403.8(f)(1)(B) (3)	§ 5.2A(3)					
e. Self-Monitoring Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					
f. Reporting & Notification Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					
g. Recordkeeping Requirements	403.8(f)(1)(B) (4)	§ 5.2A(4)					
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[Note: Required only if POTW has incorporated the use of Pollutants Not Present and § 6.4 of the Model SUO.]</i>	403.8(f)(1)(B) (4) & 403.12(e) (2)	§ 5.2A(5)				4.3.4(e)	
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B) (5)	§ 5.2A(7)					

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REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. The ordinance should indicate that a user is required to develop a slug discharge control plan if determined by the POTW to be necessary.]</i>	403.8(f)(1)(B) (6)	§ 5.2A(8)					
k. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					
l. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					
m. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					
n. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					
o. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					
p. Requirement to submit Chain-of-Custody forms with monitoring data <i>[Note: Optional permit provision]</i>							
D. Required Reports							
1. Develop compliance schedule for installation of technology	403.8(f)(1)(iv)	§§ 5.2b(2) & 10.4	√			4.2.5(c) 5.7	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
2. Reporting Requirements [403.12] <i>Types of Reports</i>							
a. Baseline monitoring report	403.12(b)	§ 6.1	√			4.2.2	
(i) Identifying Information	403.12(b)(1)	§ 6.1B(1) & § 4.5A(1)a	√			4.2.2	
(ii) Other Environmental Permits Held	403.12(b)(2)	§§ 6.1B(1) & 4.5A(2)	√			4.2.2	
(iii) Description of operations	403.12(b)(3)	§§ 6.1B(1) & 4.5A(3)a	√			4.2.2	
(iv) Flow measurements	403.12(b)(4)	§§ 6.1(b)(2) & 4.5A(6)	√			4.2.2	
(v) Measurement of pollutants	403.12(b)(5)	§ 6.1B(2)	√			4.2.2	
(vi) Certification	403.12(b)(6)	§ 6.1B(3)	√			4.2.2	
(vii) Compliance schedule	403.12(b)(7)	§ 6.1B(4)	√			4.2.2	
b. Compliance schedule progress report	403.12(c)	§ 6.2	√			4.3.6	
c. Report on compliance with categorical Pretreatment Standard deadline	403.12(d)	§ 6.3	√			4.3.3	
d. Periodic reports on continued compliance							
- From categorical users	403.12(e)	§ 6.4A	√			4.3.4	
- From significant non-categorical users	403.12(h)	§ 6.4A	√			4.3.4	
e. Notice of potential problems to be reported immediately (including slug loads)	403.12(f)	§ 6.6	√			2.8(b)	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
f. Notification of changes affecting potential for a slug discharge <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(vi)	§ § 6.5 & 6.6	√			2.8(b) 4.2.5(j)	
g. Notice of violation/sampling requirement <i>[NOTE: Required streamlining revision.]</i>	403.12(g)(2)	§ 6.8	√			4.3.7	
h. Requirement to conduct representative sampling	403.12(g)(3)	§ 6.4E	√			4.3.2	
i. Notification of changed discharge	403.12(j)	§ 6.5	√			2.6	
j. Notification of discharge of hazardous waste	403.12(p)	§ 6.9	√			4.3.8	
Other Reporting Requirements							
k. Data accuracy certification & authorized signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14	√			4.3.4(b) 4.3.9	
l. Recordkeeping Requirement (3 years or longer)	403.12(o)	§ 6.13	√			4.3.10	
- Including documentation associated with Best Management Practices <i>[NOTE: Required streamlining provision.]</i>	403.12(o)	§ 6.13	√			4.3.10	
m. Submission of all monitoring data <i>[NOTE: Required streamlining revision]</i>	403.12(g)(6)	§ 6.4F		√		---	
n. Annual certification by Non-significant categorical Industrial Users <i>[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]</i>	403.3(v)(2)	§§ 4.7C & 6.14B	√			4.3.5	

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
o. Certification of pollutant not present <i>[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]</i>	403.12(e)(2)(v)	§ 6.14C	√			4.3.4 (e)	
E. Test Procedures [40 CFR Part 136 & 403.12(g)]							
1. Analytical procedures (40 CFR Part 136) <i>[NOTE: Required streamlining provisions]</i>	403.12(g)	§ 6.10	√			4.3.2	
2. Sample collection procedures <i>[NOTE: Required streamlining provisions]</i>	403.12(g)(3) & (4)	§ 6.11	√			4.3.2 4.3.11	
F. Inspection and Monitoring Procedures [403.8(f)]							
1. Right to enter all parts of the facility at reasonable times	403.8(f)(1)(v)	§ 7.1	√			4.5	
2. Right to inspect generally for compliance	403.8(f)(1)(v)	§ 7.1	√			4.5	
3. Right to take independent samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1	√			4.5	
4. Right to require installation of monitoring Equipment	403.8(f)(1)(iv)	§ 7.1	√			4.5	
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1	√			4.5	
G. Remedies for Non-compliance (Enforcement) [403.8(f)(1)(vi)]							
1. Non-emergency response							
a. Injunctive relief	403.8(f)(1)(vi)	§ 11.1	√			6.7	
b. Civil/Criminal penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3	√			6.5 6.6	Only mentions \$1k under permit contents, not under civil/criminal penalties.

NONE = No revision necessary

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	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
			NONE	REQ	REC		
2. Emergency response							
a. Immediately halt actual/threatened discharged	403.8(f)(1)(vi) (B)	§ 10.7	√			6.8	
3. Legal authority to enforce Enforcement Response Plan	403.8(f)(1)(vi)	§ 11.4	√			Sec 6 Intro	
H. Public Participation							
1. Publish list of Industrial Users in Significant Noncompliance <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(viii)	§ 9	√			Section 7	
2. Access to data [403.8(f)(1)(vii) & 403.14]							
a. Government	403.14(a) & (c)	§ 8	√			4.7	
b. Public	403.14(b)	§ 8	√			4.7	
I. Optional Provisions							
1. Net/Gross adjustments <i>[streamlining provision]</i>	403.15	§ 2.2 D					
2. Equivalent mass limits for concentration Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 E					
3. Equivalent concentration limits for mass limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 F					
4. Upset Notification	403.16	§ 13.1					
5. Waive monitoring for pollutant not present or expected to the present <i>[streamlining provision]</i>	403.12(e)(2)	§ 6.4B	√			4.3.4(e)	
6. Reduce periodic compliance reporting <i>[streamlining provision]</i>	403.12(e)(3)	§ 6.4C	√			4.3.4(f)	

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7. Other special agreement or waivers (excluding wavier of National Categorical Pretreatment Standards and Requirements)							
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N		Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments / Notes
				NONE	REQ	REC		
	8. Hauled Waste Reporting/Requirements		§ 3.4	√			2.9	
	9. Grease Interceptor Reporting/Requirements		§ 3.2 C					
	10. Authority to issue Notice of Violations (NOVs)		§ 10.1	√			6.1	
	11. Authority to issue Administrative Orders (AOs)			√			6.3	
	12. Authority to issue Administrative Penalties		§ 10.6					
	13. Authority to enforce again falsification or tempering			√			6.7(e) & (f)	
	14. Any other supplemental enforcement actions as noted in the POTW's enforcement response plan							
	15. Permit Appeals Procedures			√			4.9	
	16. Penalty or Enforcement Appeals Procedures			√			4.9	
	17. Bypass Notification	403.17	§ 13.3					

Document(s) submitted for review:

Lynn Kurth, ERG

Pretreatment Regulations of the Allegheny County
Sanitary Authority (ALCOSAN)

Name of Reviewers

