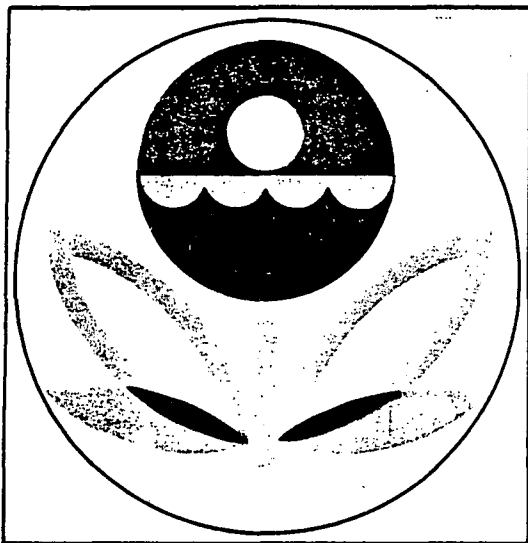


# **U.S. ENVIRONMENTAL PROTECTION AGENCY**



**PENNSYLVANIA MINOR DISCHARGER  
NPDES COMPLIANCE AUDIT 1983**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer To: 3WM52

MAR 18 1983

Mr. C. T. Beechwood  
Regional Water Quality Manager  
PA Dept. of Environmental Resources  
1875 New Hope Street  
Norristown, PA 19401

Dear Mr. Beechwood:

This letter is to confirm our plans to visit your office on March 29 and 30, 1983. We may also want to return on April 1 if we are unable to complete our reviews.

We plan to discuss with your staff the major facilities listed on the most recent QNCR. Of particular concern are the following:

		<u>County</u>
PA0026646	Antietam Valley Mun. Auth.	Berks
PA0024180	Berks-Montgomery Mun. Auth.	Montgomery
PA0026042	Bethlehem City	Northampton
PA0026450	Bristol Twp. Authority	Bucks
PA0025917	Chalfont - New Britain Jt. S.A.	Bucks
PA0027103	DELCORA	Delaware
PA0026531	Downingtown STP	Chester
PA0026948	Falls Township Authority	Bucks
PA0026247	Hatfield Twp. M.A.	Montgomery
PA0026701	Morrisville Borough M.A.	Bucks
PA0027421	Norristown Boro	Montgomery
PA0020290	Quakertown Boro	Bucks
PA0026549	Reading City	Berks
PA0027383	Southwest Delaware Co. M.A.	Delaware
PA0027031	West Chester - Goose Creek	Chester
PA0026018	West Chester - Taylor Run	Chester
PA0011371	Baldwin Hardware Manuf. Corp.	Berks
PA0022047	Crompton & Knowles Corp.	Berks
PA0012823	PP & L Martins Creek	Northampton
PA0013315	Publicker Dist. - Div. Continental	Philadelphia

We also plan to review the files for the following minor municipal facilities which have been funded under public law 92-500 and have been certified complete by the Corps of Engineers:

		<u>County</u>
PA0070351	Amity Township M.A.	Berks
PA0022543	Bally Municipal Authority	Berks
PA0023540	Berks-Montgomery Mun. Auth.	Berks
PA0024376	Boyertown Boro	Berks
PA0070424	Caernarvon	Berks
PA0024422	Lower Salford Township	Montgomery
PA0070254	Lynn Township Sanitary Auth.	Lehigh
PA0070271	Maidencreek Township M.A.	Berks
PA0020699	Montgomery W & S	Lycoming
PA0044776	Northwestern Chester County	Chester
PA0024961	Oley Township M.A.	Berks
PA0024074	Shoemakersville M.A.	Berks
PA0020711	Topton Boro M.A.	Berks

At random we selected the following minor facilities for file review during our visit:

Primary Industrial Minors

PA0012033	Valley Paper Mills Modena Plant	Chester
PA0012017	Allied Corp. - FXD Plant	Philadelphia
PA0011045	Pycofoam Corp., Norristown	Montgomery
PA0012980	G.O. Carlson, Inc. - Viaduct Plant	Chester
PA0051080	Thompson-CSF Components Corp.	Montgomery
PA0012475	MET ED Portland	Northampton
PA0050369	Unitog Company	Bucks

Secondary Industrial Minors

PA0070106	Exxon Company, Tuckerton Terminal	Berks
PA0070416	Conrail-Beth Diesel Terminal	Northampton
PA0050296	Monarch Development Corp.	Montgomery
PA0050687	Bethayres Valley Apts.	Montgomery
PA0029912	Embreeville State Hospital	Chester
PA0070319	Reading-Berks Joint Fire Training	Berks

Municipal Minors

		<u>County</u>
PA0020231	Hatfield Boro	Montgomery
PA0028355	Eddystone Boro	Delaware
PA0051004	Lower Salford Township	Montgomery
PA0070149	Leesport Boro	Berks
PA0041742	Nazareth Boro Mun. Auth.	Northampton

Our file review will also include the following federal facilities which are in noncompliance either due to effluent violations or failure to submit discharge monitoring reports:

PA0036447	Naval Ship Engineering Center	Phila.
PA0046264	U.S. Army Corps Eng. - Blue Marsh	Berks

Sincerely yours,

ORIGINAL SIGNED BY

J. DAVIS

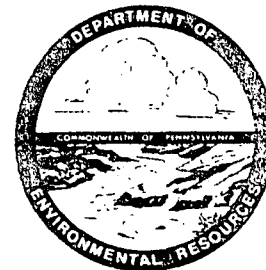
Joseph Davis, Chief  
Pennsylvania Section  
Water Permits Branch  
Water Management Division

cc: Walter Stanley, Norristown DER



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Post Office Box 2063  
Harrisburg, Pennsylvania 17120  
September 7, 1983



(717) 787-2666

Mr. Greene A. Jones, Director  
Water Management Division  
EPA Region III  
Sixth and Walnut Streets  
Philadelphia, PA 19106

Re: Minor Discharger  
NPDES Compliance Audit - 1983

Dear Mr. Jones:

We have reviewed the 1983 Minor Discharger NPDES Compliance Audit Report and have concluded that it represents a reasonable benchmark of minor discharger compliance status at the time the audit was conducted.

Your August 17, 1983 transmittal letter accompanying the report requested comments on the recommendations and other portions of the report. General comments are as follows:

1. The sample size appears to be small for an accurate assessment for all categories except P.L. 92-500 facilities where 100% of the facilities in the category were reviewed. Only 5% of the unfunded publicly owned treatment works, 5% of the primary industries, and 2% of the secondary industries were reviewed.
2. The summary indicates that the compliance percentage would increase if all dischargers currently not submitting DMR's would begin to submit their DMR's. The estimated compliance percentage for nonsubmitting dischargers appears to be based on the compliance percentage for dischargers currently submitting DMR's. We agree that Pennsylvania's compliance percentage would increase but probably not as much as estimated in your report, since our experience indicates that dischargers who fail to submit DMR's are also more likely to have effluent violations.
3. The summary strongly suggests more enforcement effort against minor dischargers who received P.L. 92-500 funding. Is this an indication of a change in EPA priorities? Our current Memorandum of Agreement with EPA stresses major dischargers and tends to de-emphasize all minors. Any additional enforcement effort that we would spend on minor dischargers would take resources away from the major dischargers.
4. Some of the cases reviewed did not have, or need NPDES permits. Two examples are the Ortanna Sewage Treatment Plant in Hamiltonban Township, Adams County which has spray irrigation, and the Youth Development Center in Loysville, Perry County, which is connected to a municipal system.

SEP 13 1983

September 7, 1983

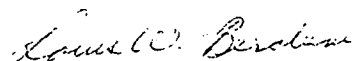
5. Several of our regional offices have recently initiated programs to obtain DMR's from those dischargers who are not submitting them. A review of minor dischargers by these regions shows that some of these are now submitting DRM's. We expect the remaining Regions to implement a similar program.

Comments on the specific recommendations are as follows:

1. The report recommends uniform implementation of the Compliance Monitoring Strategy since the strategy addresses DMR review and follow-up. The Compliance Monitoring Strategy has provided the basis for the 1983-84 fiscal year Regional Program Plans which were implemented as of July 1, 1983. More detailed Policies and Procedures based on this strategy are currently under development.
2. We agree that there are problems with some regional filing systems, and plan to review these systems during the current fiscal year.
3. The report proposes a statewide review of DMR's versus permit limitations since some dischargers are reporting against obsolete limits. We agree that such a review would be useful, but it would also be very time consuming. These can be reviewed as inspections are conducted, rather than all at one time. Ideally, your Permit Compliance System (PCS) should be expanded to include minor dischargers. PCS has the potential to eliminate the need for manual logging, identify significant noncompliance, identify nonreporting dischargers, and provide statistics that could have significantly reduced the 71 work days that your report indicates was spent by your staff on this audit.
4. This item recommended manual or computerized case histories. Complete manual case histories for all dischargers are not feasible because of the large workload involved. Case histories can be compiled from the individual case files on an as needed basis. The Department's Enforcement System is still in the feasibility stage. Again, PCS would be helpful if extended to minor dischargers.
5. The recommendations from the Bureau of Water Quality Management's Enforcement Strategy will not affect most of the minor dischargers since the strategy gives emphasis to serious and willful violations. Most of the violations by minor dischargers are not as serious and no more willful than violations by ~~major dischargers and~~ would receive no additional attention.

We appreciate your recommendations and will continue to attempt to develop methods for improving the compliance percentage for minor dischargers. Your report indicates that your staff plans to discuss this further with us. Please have your staff contact Ken Okorn at (717) 787-8184 to arrange for a meeting.

Sincerely,



LOUIS W. BERCHENI, Director  
Bureau of Water Quality Management

PENNSYLVANIA MINOR DISCHARGER  
NPDES COMPLIANCE AUDIT 1983

July 28, 1983

## Summary

The audit performed during the months of March and April, 1983 resulted in the following findings:

1. The State overall compliance rate for minor dischargers is 51%. Excluding non-submittal of Discharge Monitoring Reports (DMR's) as a violation results in a 74% compliance rate.
2. P.L. 92-500 funded and operational minor facilities had a 55% compliance rate. Since these are only recently constructed, an increased effort by DER to get DMR's submitted would raise this rate to 68%. Non-submittal of DMR's by this type of facility is inexcusable, and prompt enforcement activities are called for. The justification for a continuance of federal funding of municipal treatment plants may well rest upon the compliance record of the operational facilities in existence.
3. Primary industrial facilities show a 55% compliance rate that would be raised to 75% by the elimination of reporting violations.
4. Secondary industrial facilities show a 43% compliance rate that would be raised to 75% by elimination of reporting violations.
5. Minor unfunded municipalities had a 48% compliance rate that would be raised to 79% by the elimination of reporting violations. Compliance with the reporting requirement of the permits would bring Pennsylvania's minor facilities compliance rate in line with national goals and standings.
6. The federal facilities compliance rate, at 93%, is significantly higher than the other categories. Only one federal facility did not submit DMR's.
7. The condition and availability of the files reviewed varied from excellent to poor. The recent shifting of files between Regions is not the problem.
8. DER staff cooperation was excellent and is gratefully acknowledged.



## Recommendations

1. Uniform implementation of DER's Compliance Monitoring Strategy (CMS) is recommended. Review of the files showed that, despite numerous inspections by DER personnel, the issue of non-submittal of DMR's was not adequately addressed. The DMR logging procedures need review in all Regions with additional resources allocation required in some cases.
2. A review of regional files control, files availability, and the basic structure of the files system is recommended. Time spent looking for lost files is non-productive. Discussions with DER staff indicated that they too see a need for improvements in some of the Regions.
3. A state-wide review of DMR versus permit limitations would be useful. A number of permittees are reporting against obsolete or superseded permit limitations and show up as in compliance while violating their existing permit.
4. A log of DER activities (inspections, enforcement actions, etc.) for each facility might be considered. The use of operations resources as documented by inspection reports in the files indicated significant differences between Regions, as well as within a given Region. Better staff utilization would be possible if either manual or computerized case histories were available to the managers to indicate the results obtained for the resources expended.
5. Implementation of a uniform statewide enforcement strategy (currently under development) should be given a high DER priority. The resources used in developing and issuing a Part I and Part II permit, and the funds spent to build and operate treatment plants, deserve proper follow-up and enforcement of significant violations.

### Purpose of Audit

As outlined in the regional Minor NPDES Dischargers Compliance Strategy of January 31, 1983, the Section was directed to schedule an audit no later than February 28, 1983. The compliance rate of four classes of minor dischargers were to be determined:

- 1) Funded POTWs - 100% (to establish reporting baseline)
- 2) Unfunded POTWs - 5%
- 3) Primary Industries - 5% other than coal mines
- 4) Secondary Industries - 2%

Due to the high costs both in resources and travel, it was decided to add three more activities to be performed during each audit visit which would otherwise be performed at another time:

1. Meetings with DER regional management to discuss any procedural or managerial problems that may exist.
2. Audit the federal facilities to provide baseline data requested by the Regional Administrator.
3. Perform the usual follow-up discussions regarding violators found on the Quarterly Non-Compliance Report prior to taking federal enforcement action. These discussions include field personnel as well as managers and are a key activity in optimizing and coordinating the enforcement activities of our respective agencies.

The total cost of the audit and related activities was \$ 3,700 and 71 work days.

## Audit Procedures

The procedures for this audit are specified in the following memoranda:

1. "Region III Strategy Minor NPDES Discharger Compliance," dated January 31, 1983, from Chief, Water Permits Branch to Director, Water Management Division.
2. "Minor NPDES Discharger Strategy", dated February 24, 1983, from Chief, PA Section to PA Section technical staff.
3. "PA Audit Yardsticks," dated May 5, 1983, from Chief, PA Section to PA Section staff.
4. "Definition of Significant Noncompliance," from Acting Director, Office of Water Enforcement and Permits, to Acting Assistant Administrator, Office of Water.

Permittees in the following categories were selected for audit according to the procedures in Reference 1.

- a. P.L. 92-500 funded POTW's, 100 percent of the minor facilities of this class in each Region.
- b. Unfunded POTW's, approximately five percent of the minor facilities of this class in each Region.
- c. Primary industries, approximately five percent, other than coal mines, of the minor facilities of this class in each Region.
- d. Secondary industries, approximately two percent of the minor facilities of this class in each Region.
- e. All federal facilities in noncompliance were reviewed in the Regions.

A listing of funded facilities by Region was obtained from Grants. A computer printout by Region was used to select categories b, c, d, and e.

The five percent sample for each Region was obtained for category b by starting with the second minor unfunded POTW on the regional printout and then selecting each twentieth candidate. The five percent sample for category c was obtained in a similar manner by counting the primary industrial permittees. For category d, each fiftieth candidate was selected for the audit. Review of EPA files prior to the audit provided the candidates in category e.

During the audit it became obvious that a few of the candidates selected were major dischargers, coal mine permittees, or other nonrepresentative facilities. In those cases, the next facility of that class in that Region was substituted. Three candidates were changed out of the 179 selected.

Based on these procedures, separate lists of P.L. 92-500 funded POTW's, unfunded POTW's, primary industries, secondary industries, and federal facilities were developed for each Region. A letter was then sent to the Regions prior to the audit visit by EPA. This letter provided a list by category of facility files to be audited. In most cases, the Regions pulled the files prior to our arrival for the audit. The main purposes of the audit were to determine the compliance status of the audited facilities according to the criteria of memos 3 and 4 and to determine the State response to the violations.

1. A facility that was in compliance for the last six months of 1982 was counted as in compliance.
2. Nonsubmittal of DMR's was counted as a violation unless all DMR's were submitted for the last six months of the period from January 1982 until December 1982.
3. A facility that exceeded the effluent criteria in memo four was described as having significant effluent violations.

The selected files were reviewed at each Region by the EPA audit team. Using a check sheet, each of the audited files was classified as being in compliance, as missing DMR's, or as having effluent violations. In some cases, there were missing DMR's and effluent violations. If sufficient DMR data were available to establish significant effluent noncompliance, then the permittee was classified as being in significant noncompliance. If enough data were not available, the permittee was classified as having missing DMR's. If the violations found in the files were less than the significant noncompliance criteria, the permittee was counted as in compliance.

4. The findings were quality checked by interviewing the appropriate operations staff. A significant number of compliance activities was surfaced by this method that did not appear in the official files.

### Description of Data

Appendices 1 and 2 present the data obtained during the March through April 1983 EPA Audit of the Pennsylvania minor facilities files.

In the bar graphs (Appendix 1) the order of segments, reading from the bottom up is always: compliance, effluent violations, and missing DMR's. Figures 1-4 show the compliance status of each class of facilities. Missing DMR's are defined as a violation and included in the count. Figures 5-8 also show the compliance status of each class of facilities but based upon submitted DMR's only. Figure 9 shows the DMR submittal status of violating federal facilities. It should be noted that Regions 5 and 6 had no violating federal facilities. Figures 10-11 and figures 12-13 present regional and State wide averages, respectively. Figure 14 illustrates an interesting observation. A check of EPA's files after the audit visits showed that some DMR's were submitted to EPA, but DER had no record of same. To present the best possible picture, we had accepted a DMR log entry at the Regions as "DMR received" even though the DMRs were not found in the files. Figure 14 shows that ten to twenty percent of the DMRs get lost in DER's administrative tracking and filing systems, compared to EPA's files.

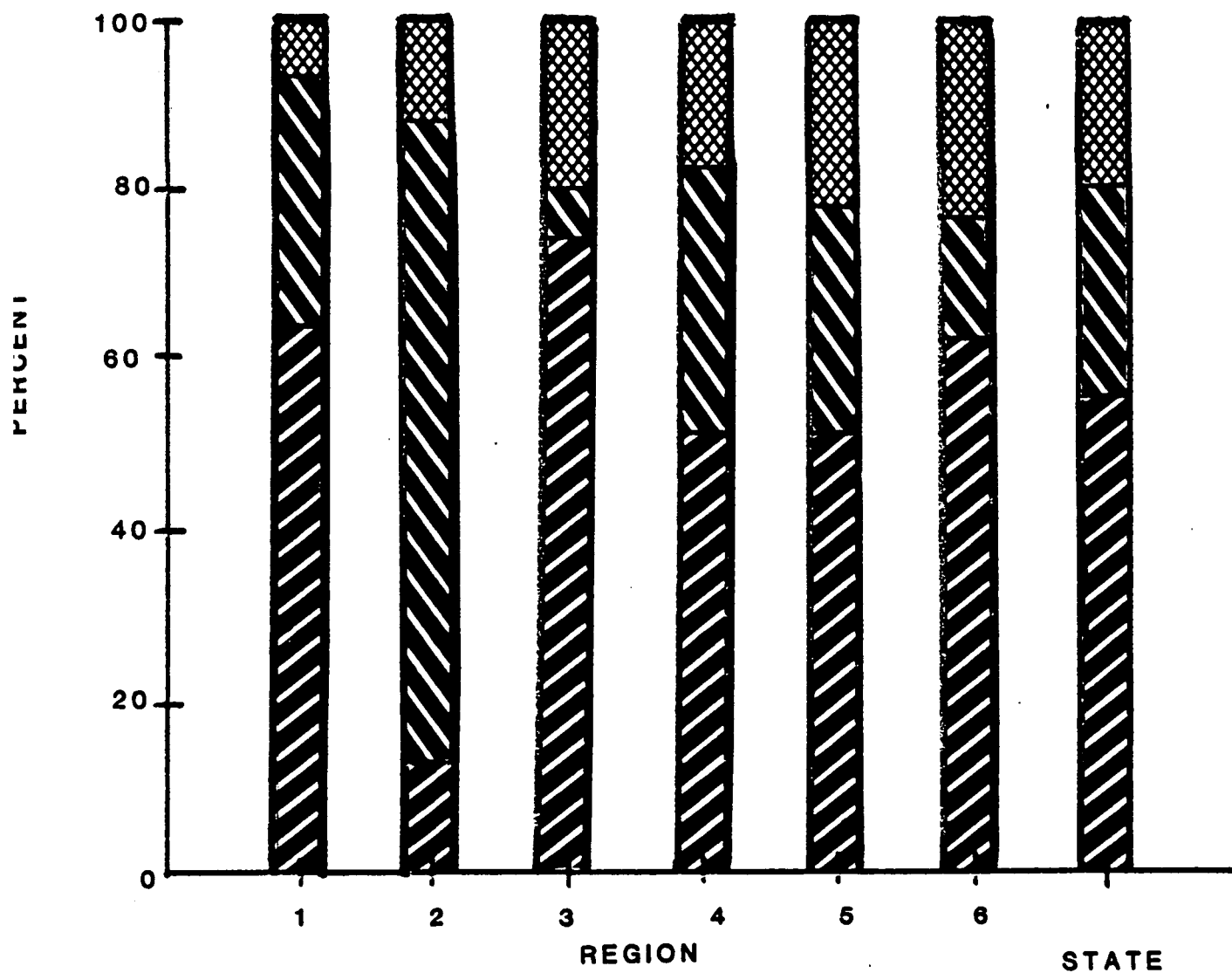
The non-submittal of DMR's as shown in Figure 15, represents a significant portion of the non-compliances. Some Regions are aggressively pursuing these violators; others are not. Tables presenting the data used to construct each figure are found in Appendix 2.

The data in Figures 1-8 and Tables 1-8 do not include federal facilities, since the violating permittees only were audited. A summary of the federal facilities compliance rate is somewhat complicated by the fact that the original permits were written on a per outfall basis rather than one per facility, as is the current practice. The State has consolidated some of these permits during reissuance, but a few are still in existence. There are currently fifty-two federal facility permits in Pennsylvania. Two are major permittees and four are duplicates or no longer under the control of federal agencies. Of the remaining forty-six facilities, three are in non-compliance, a ninety-three percent compliance rate that is significantly higher than that found for any of the other classes of minor dischargers.

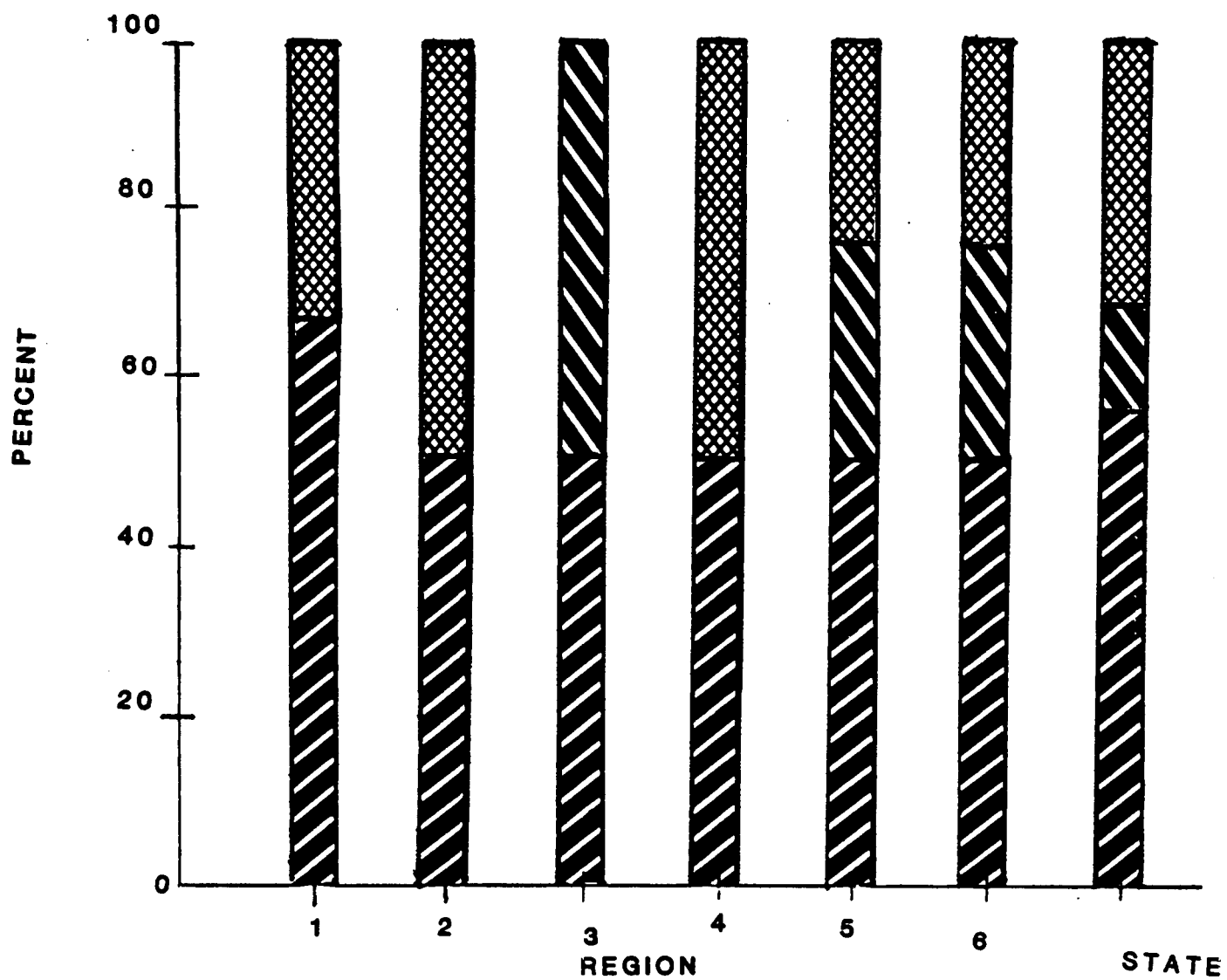
## Appendix 1

### GRAPHS

FIGURE 1 P.L. 92.500 FACILITIES



**FIGURE 2 PRIMARY FACILITIES**



**COMPLIANCE**



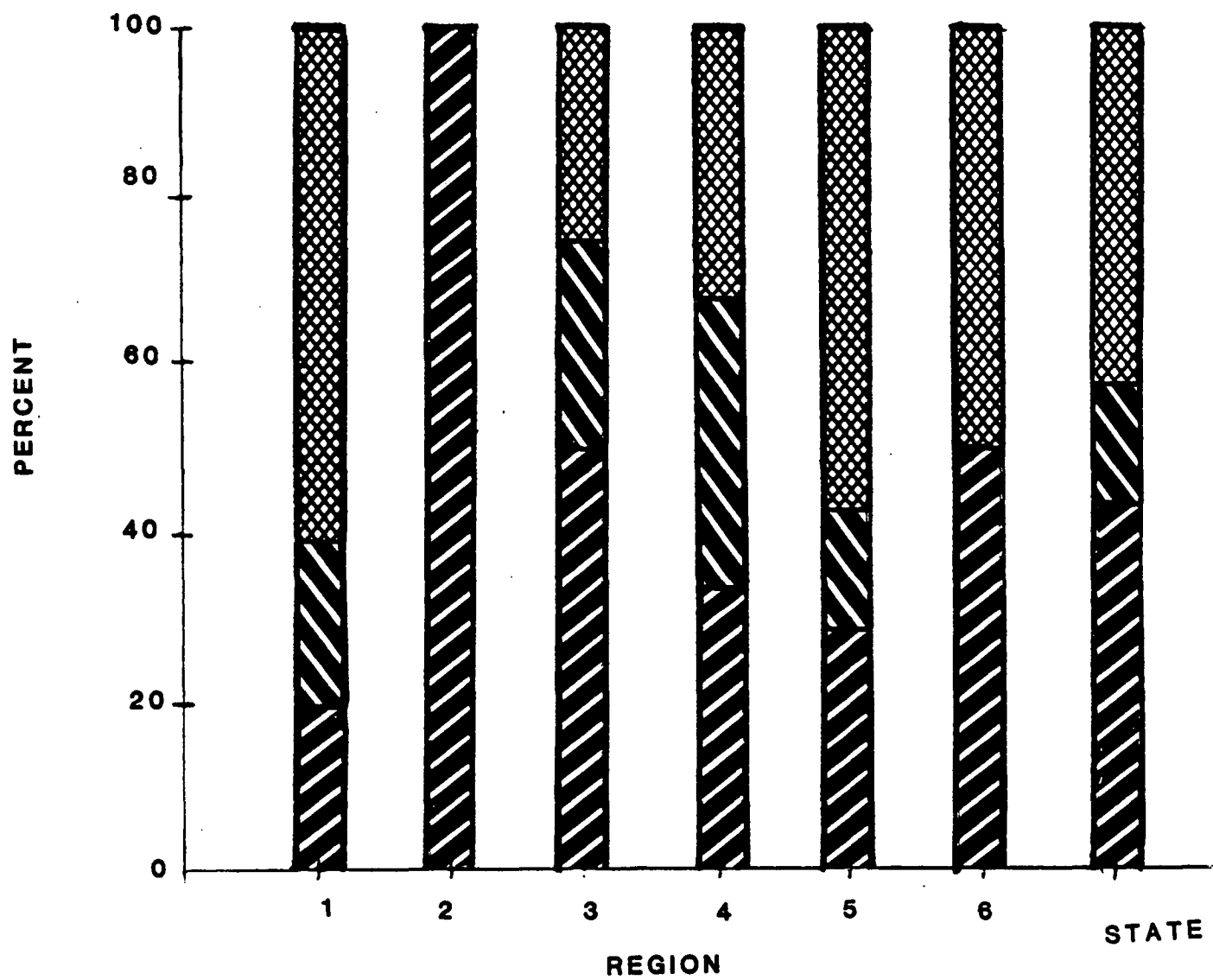
**EFFLUENT VIOLATIONS**



**MISSING DMRs**



**FIGURE 3 SECONDARY FACILITIES**



**COMPLIANCE**

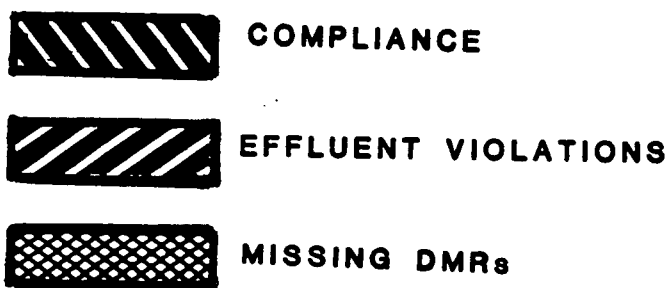
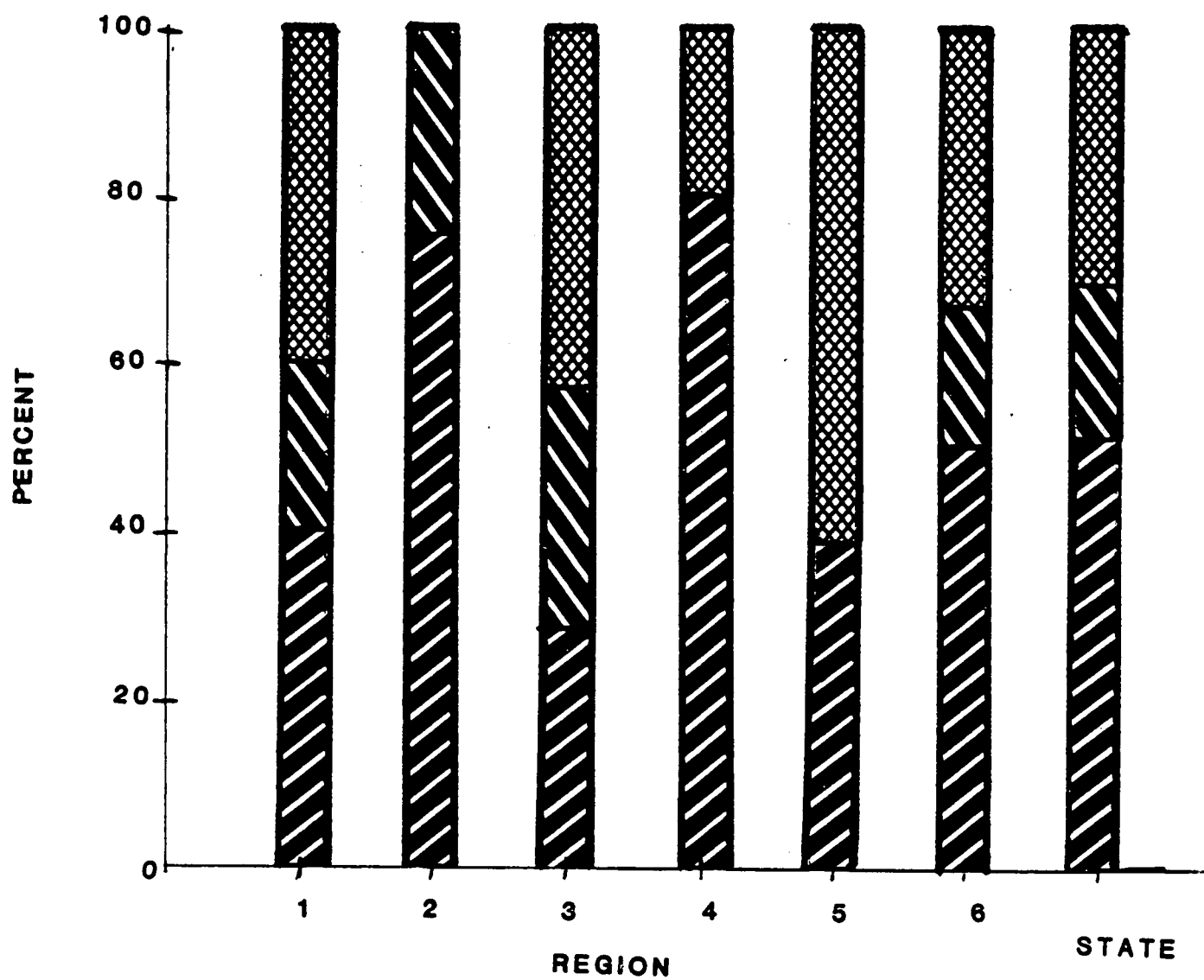


**EFFLUENT VIOLATIONS**



**MISSING DMRs**

**FIGURE 4 MINOR MUNICIPALITIES**



**FIGURE 5 P.L. 92-500 FACILITIES SUBMITTING DMR'S**

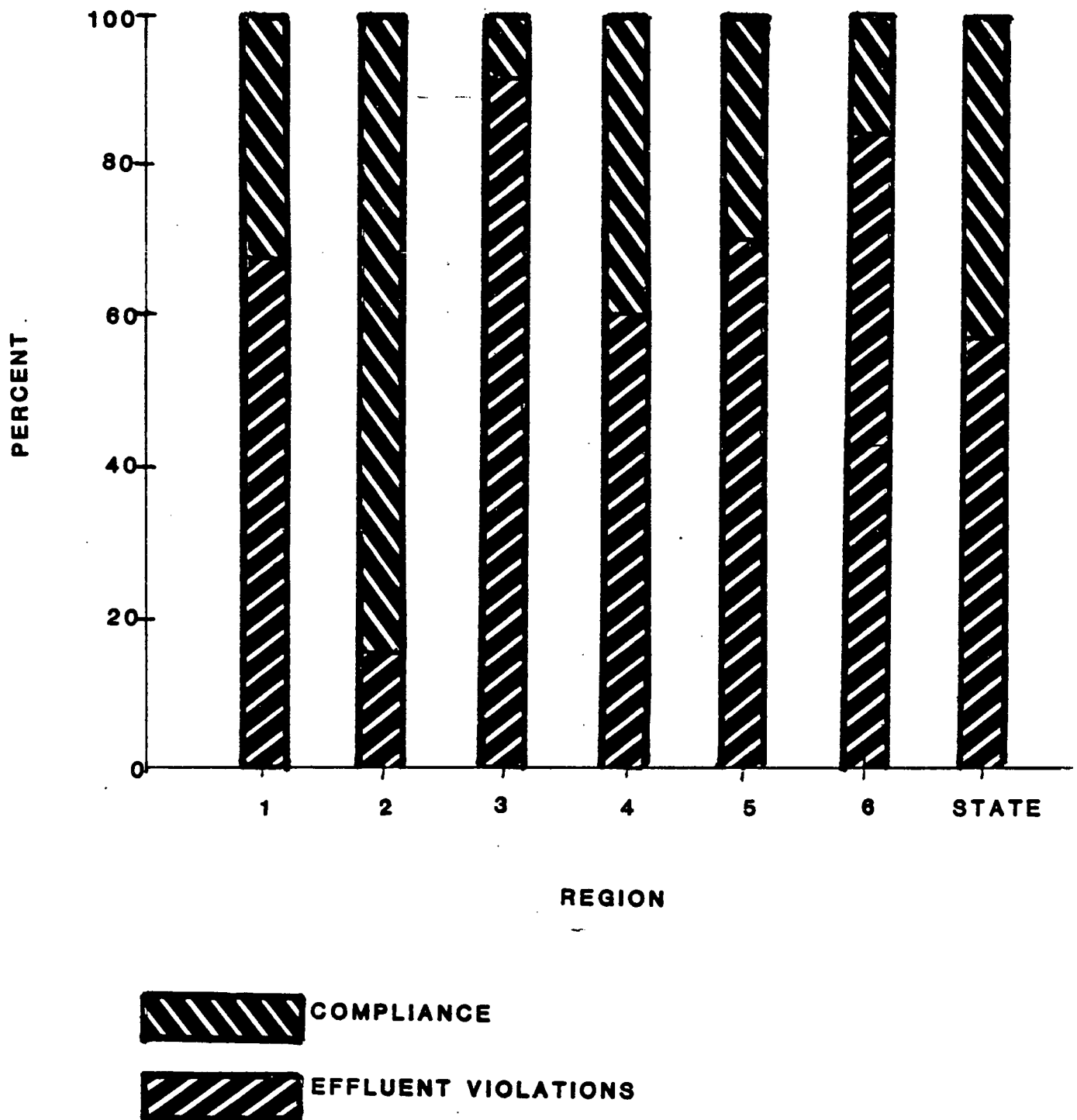


FIGURE 5 P.L. 92-500 FACILITIES SUBMITTING DMR'S

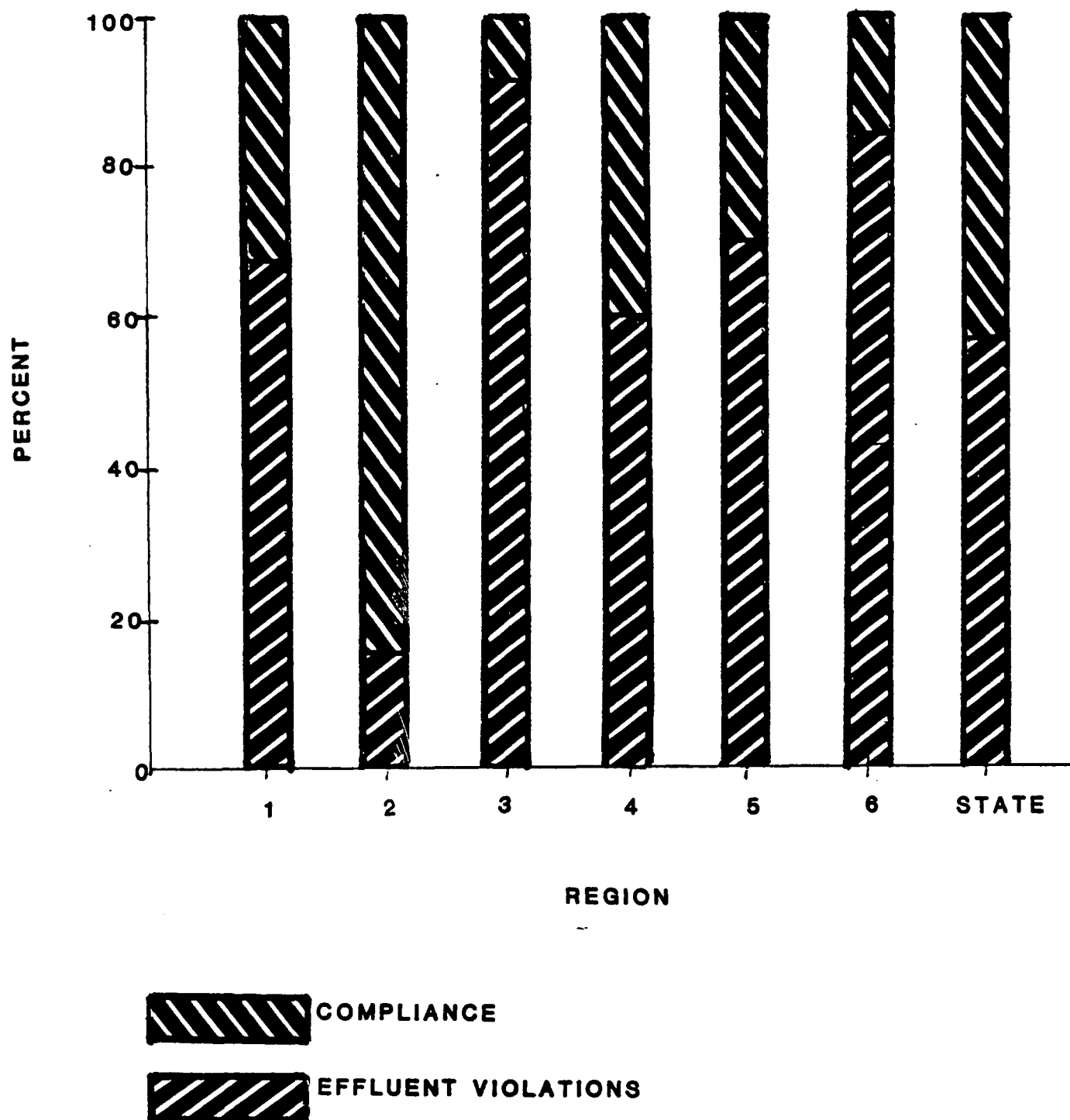
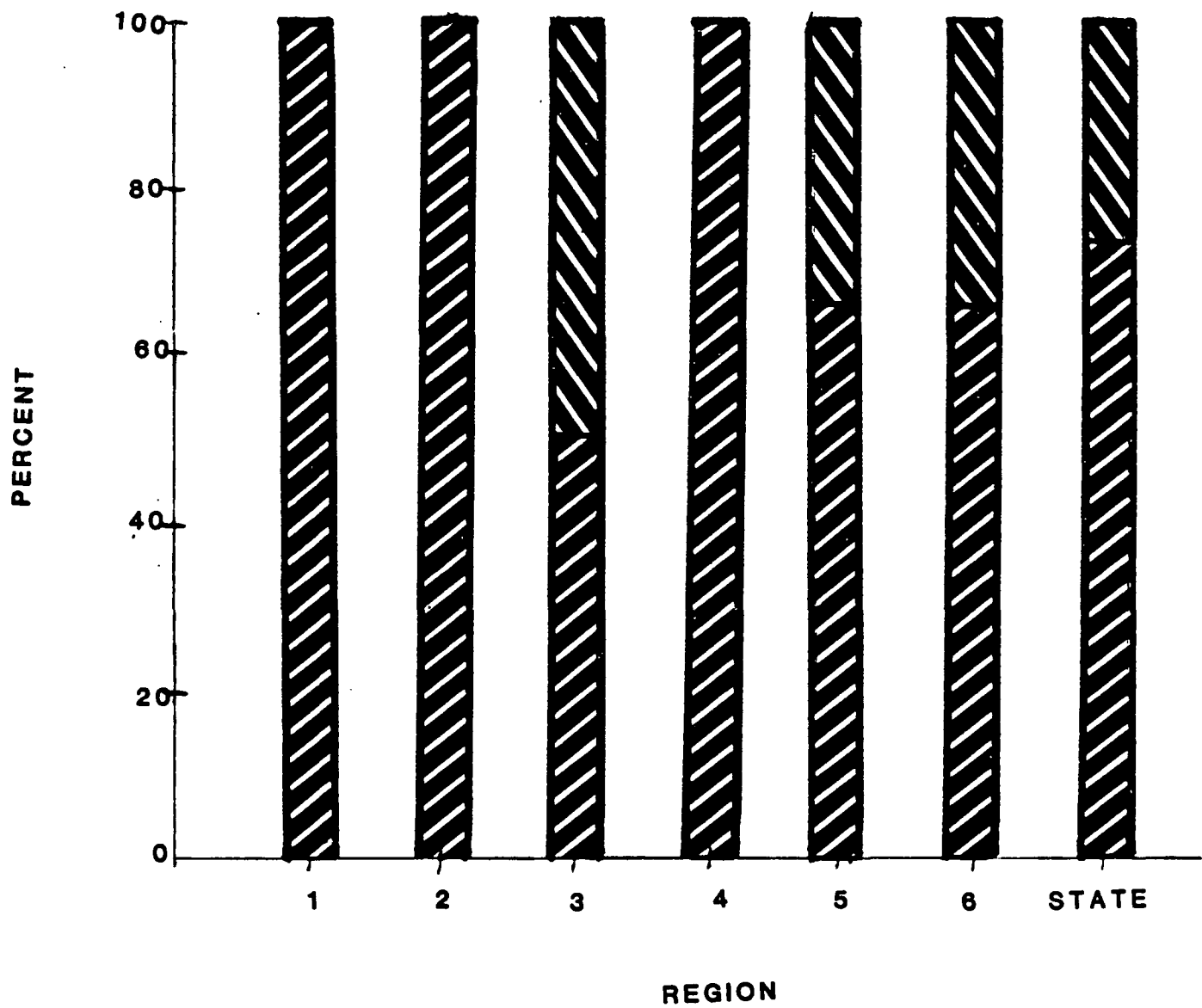


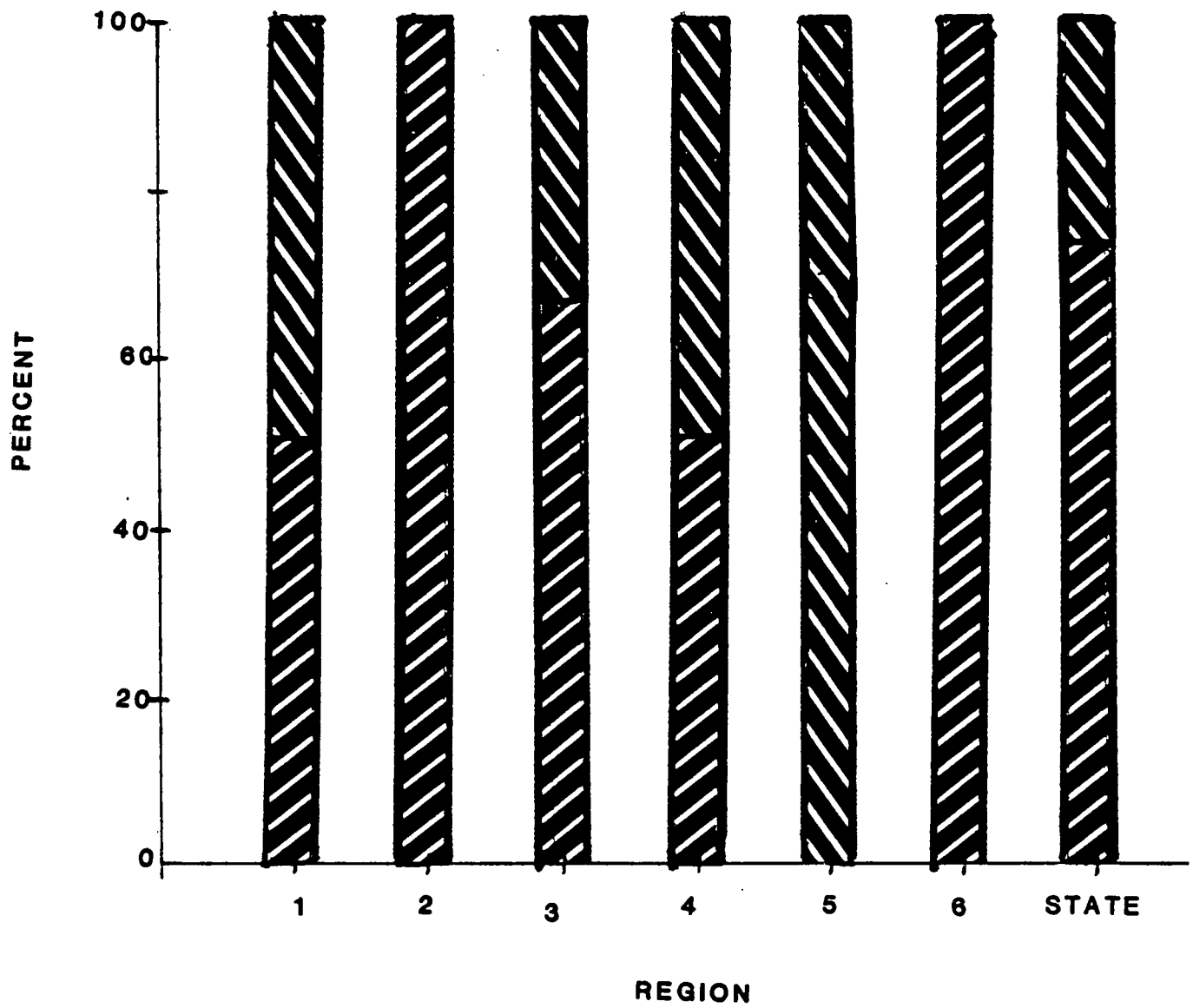
FIGURE 6 PRIMARY FACILITIES SUBMITTING DMR'S



 COMPLIANCE

 EFFLUENT VIOLATIONS

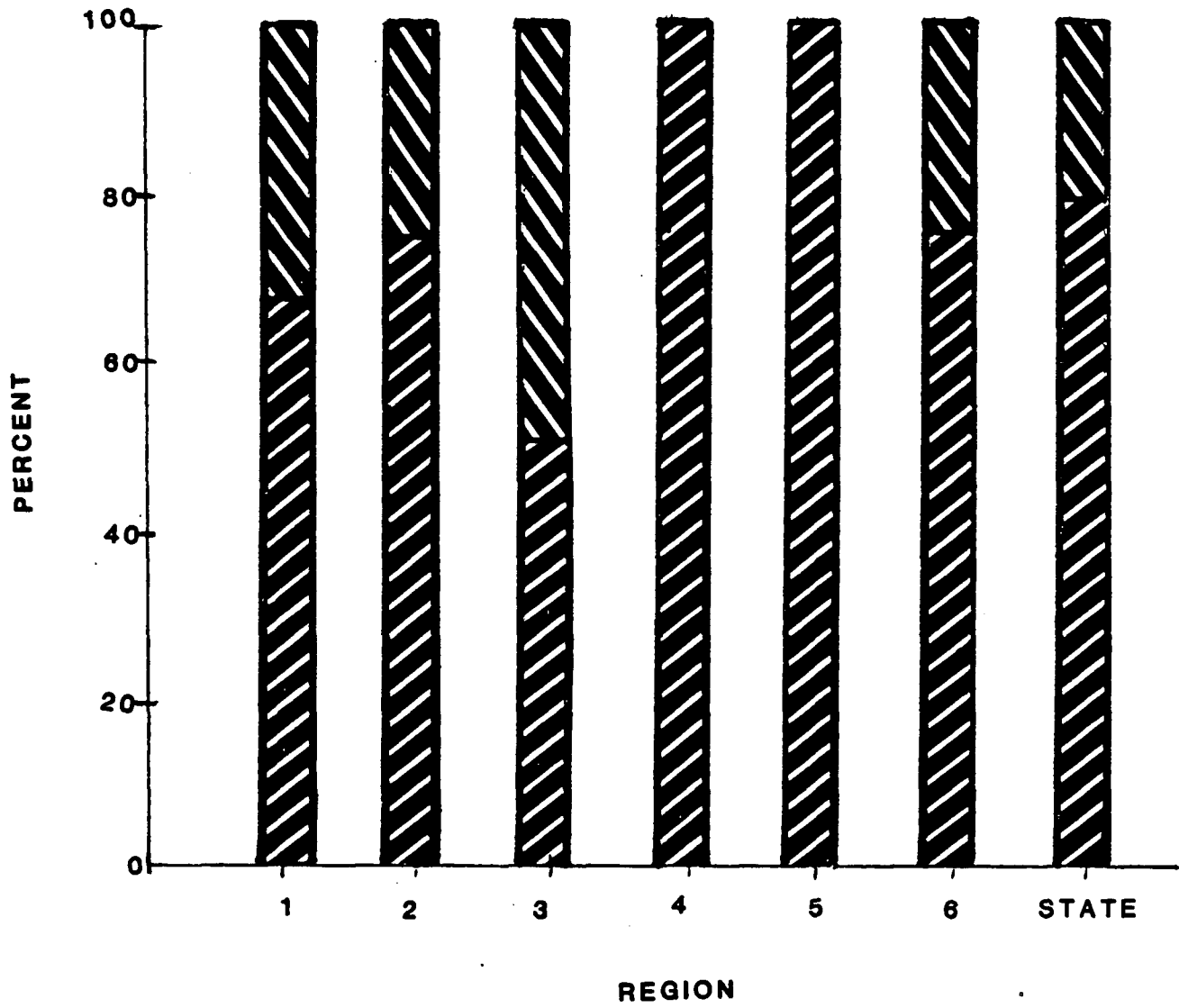
FIGURE 7 SECONDARY FACILITIES SUBMITTING DMR'S



 COMPLIANCE

 EFFLUENT VIOLATIONS

**FIGURE 8 MINOR MUNICIPALITIES SUBMITTING DMR'S**



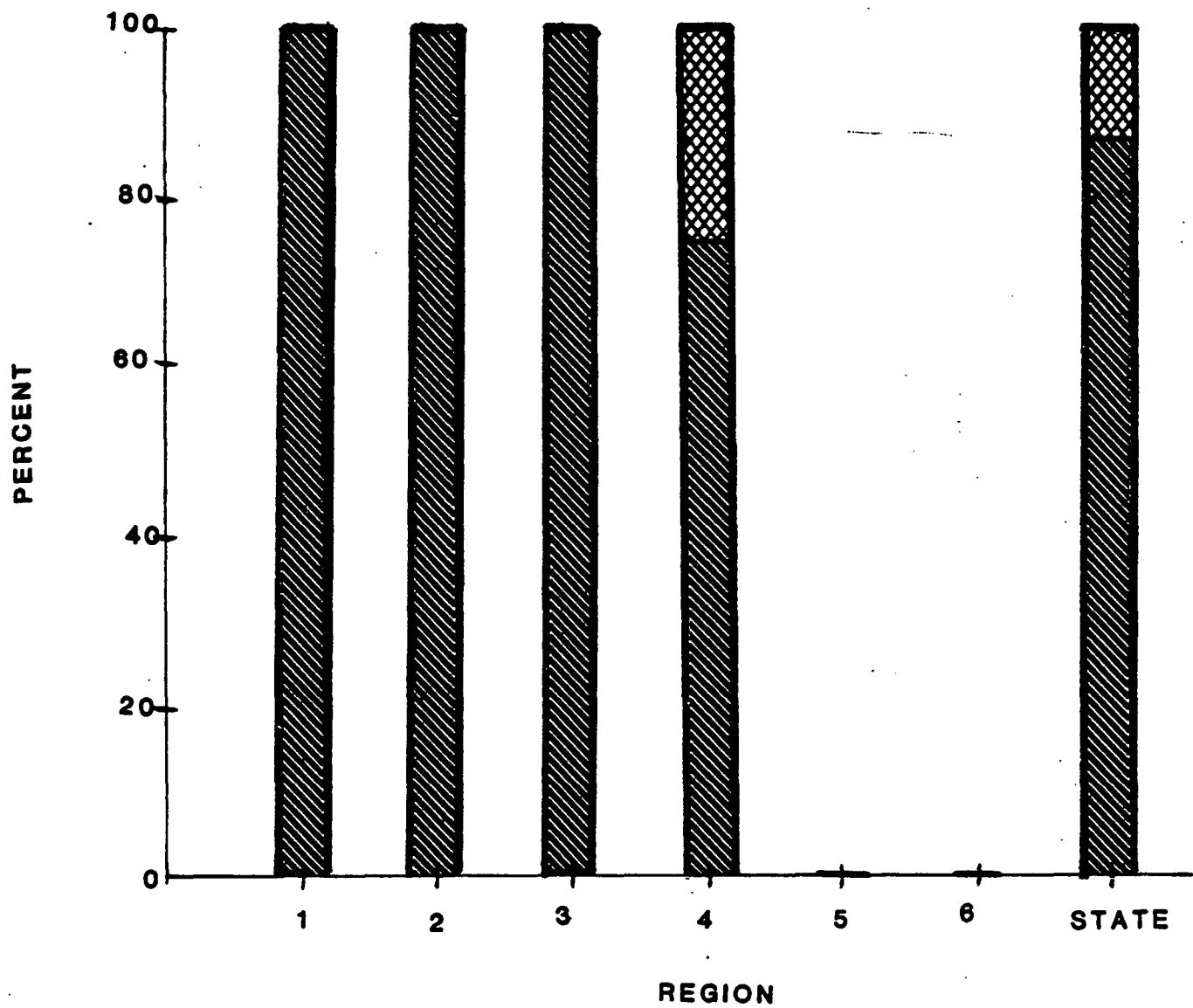
**COMPLIANCE**



**EFFLUENT VIOLATIONS**

**FIGURE 9 FEDERAL FACILITIES**

**IN NON-COMPLIANCE**



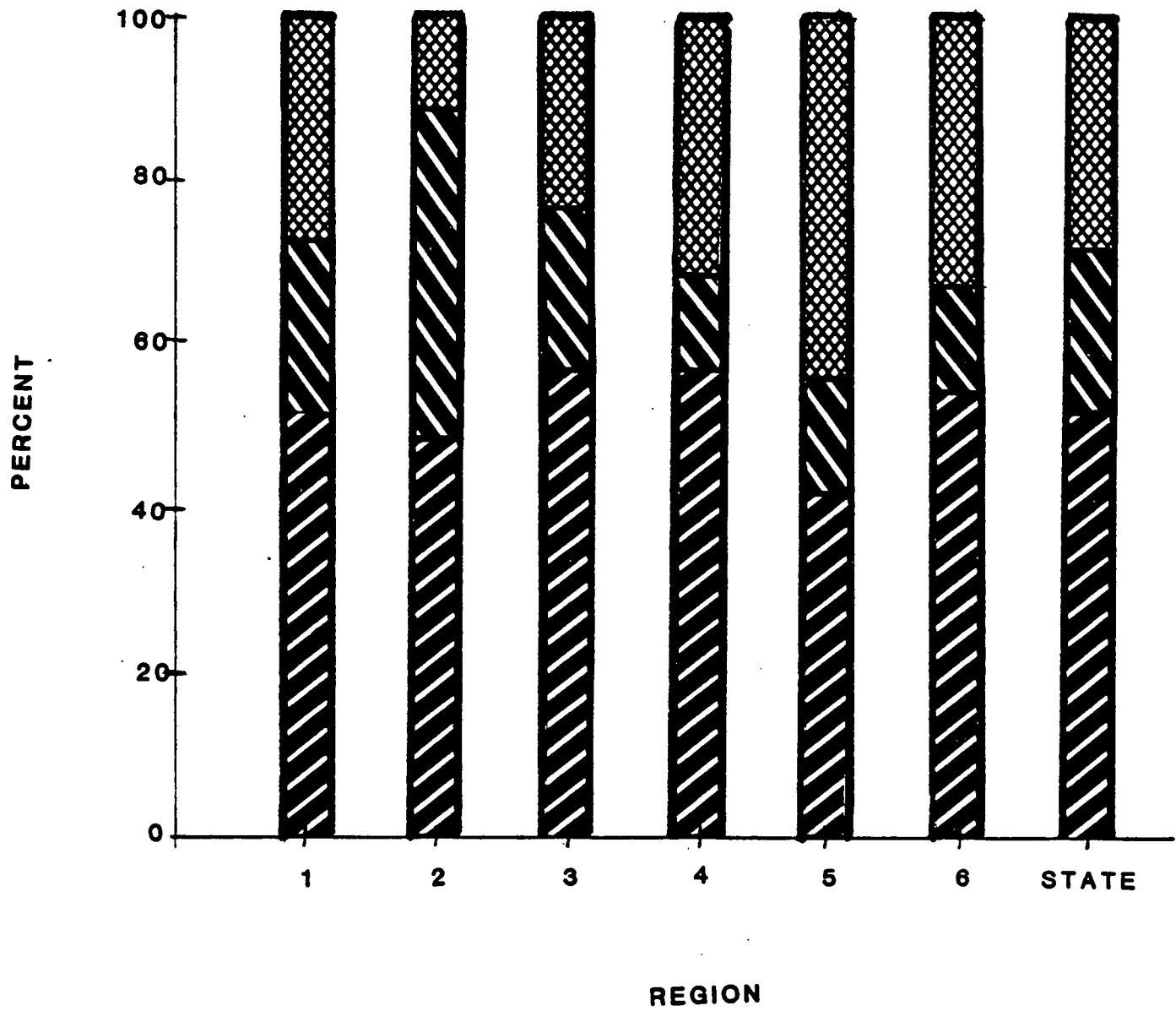
 **DMR'S SUBMITTED**

 **DMR'S MISSING**

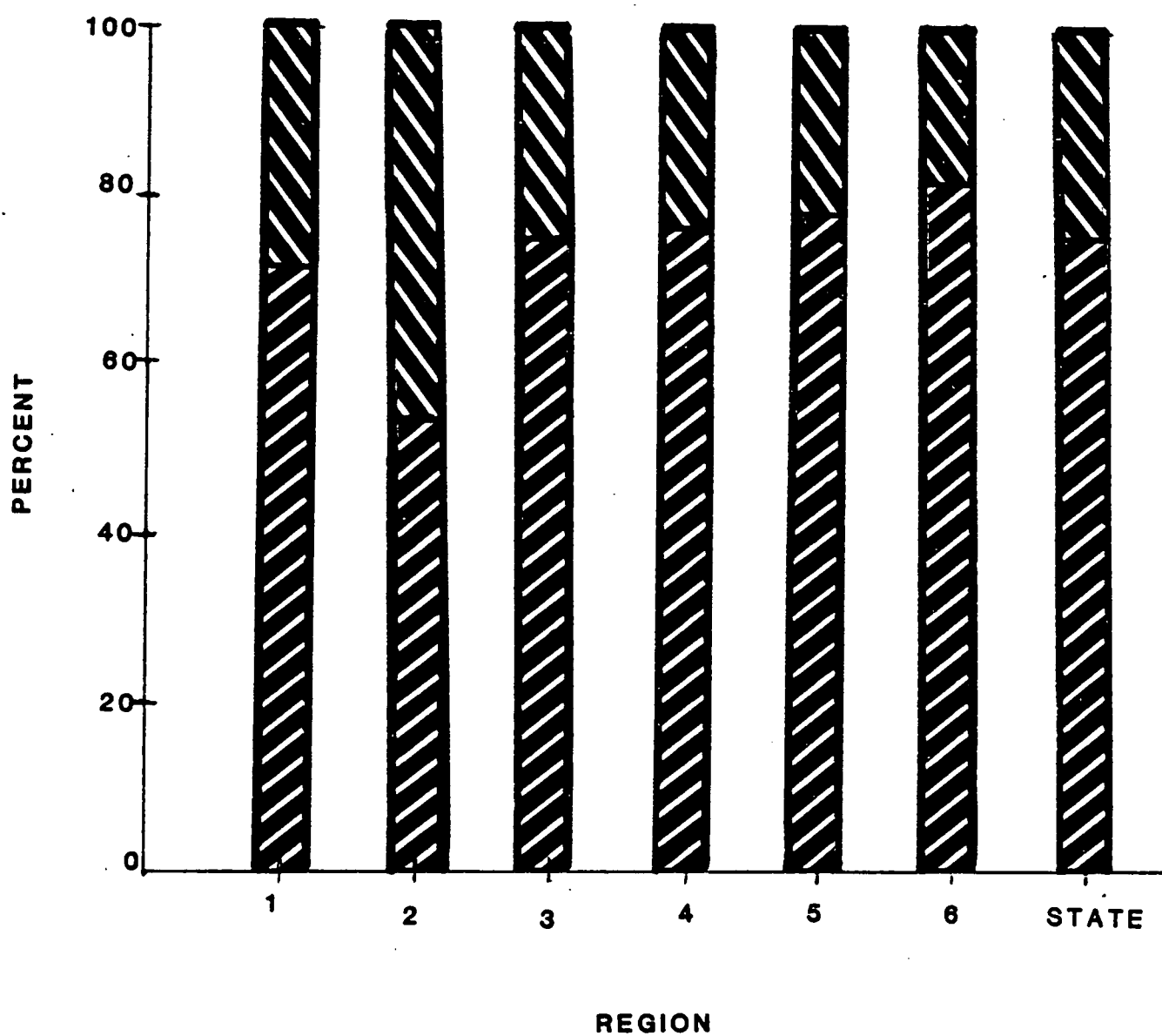
**NOTE:IN REGION 5&6 NO FEDERAL FACILITIES WERE AUDITE**



FIGURE 10 AVERAGE OF REGIONAL FACILITIES



**FIGURE 11 AVERAGE OF REGIONAL FACILITIES SUBMITTING DMR'S**



**FIGURE 12 STATE AVERAGES OF FACILITIES**

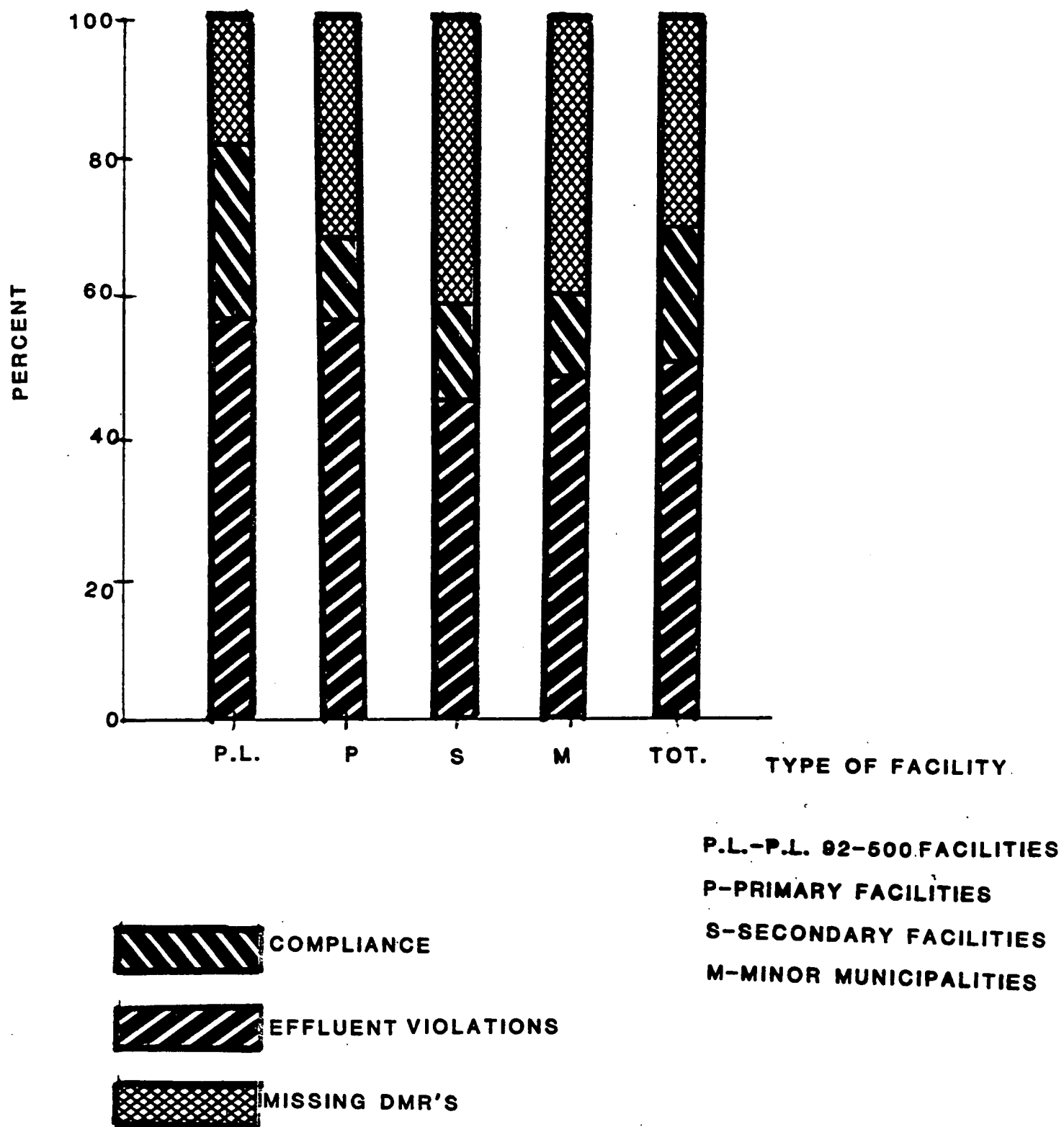


FIGURE 13 STATE AVERAGES OF FACILITIES SUBMITTING DMR'S

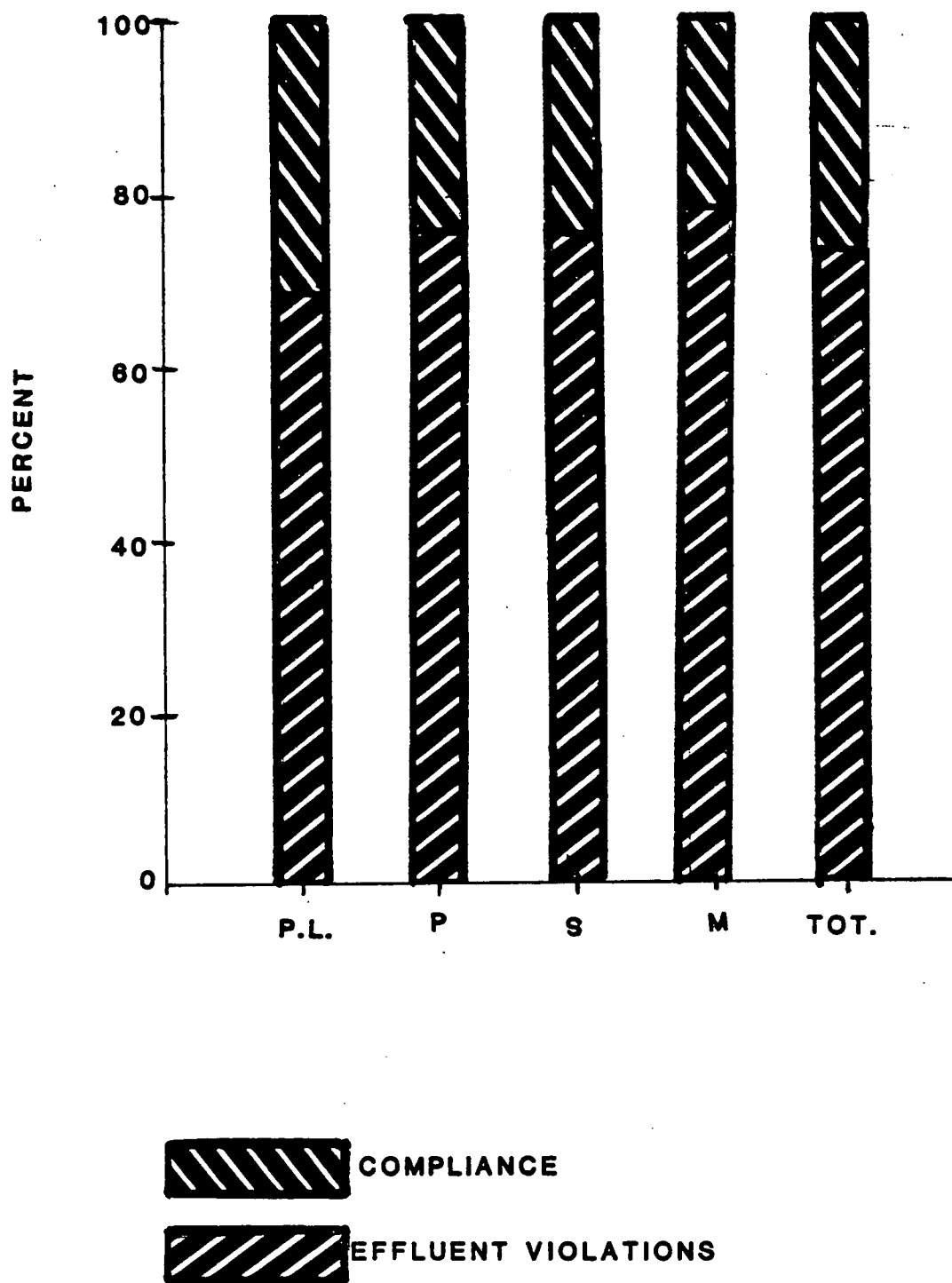
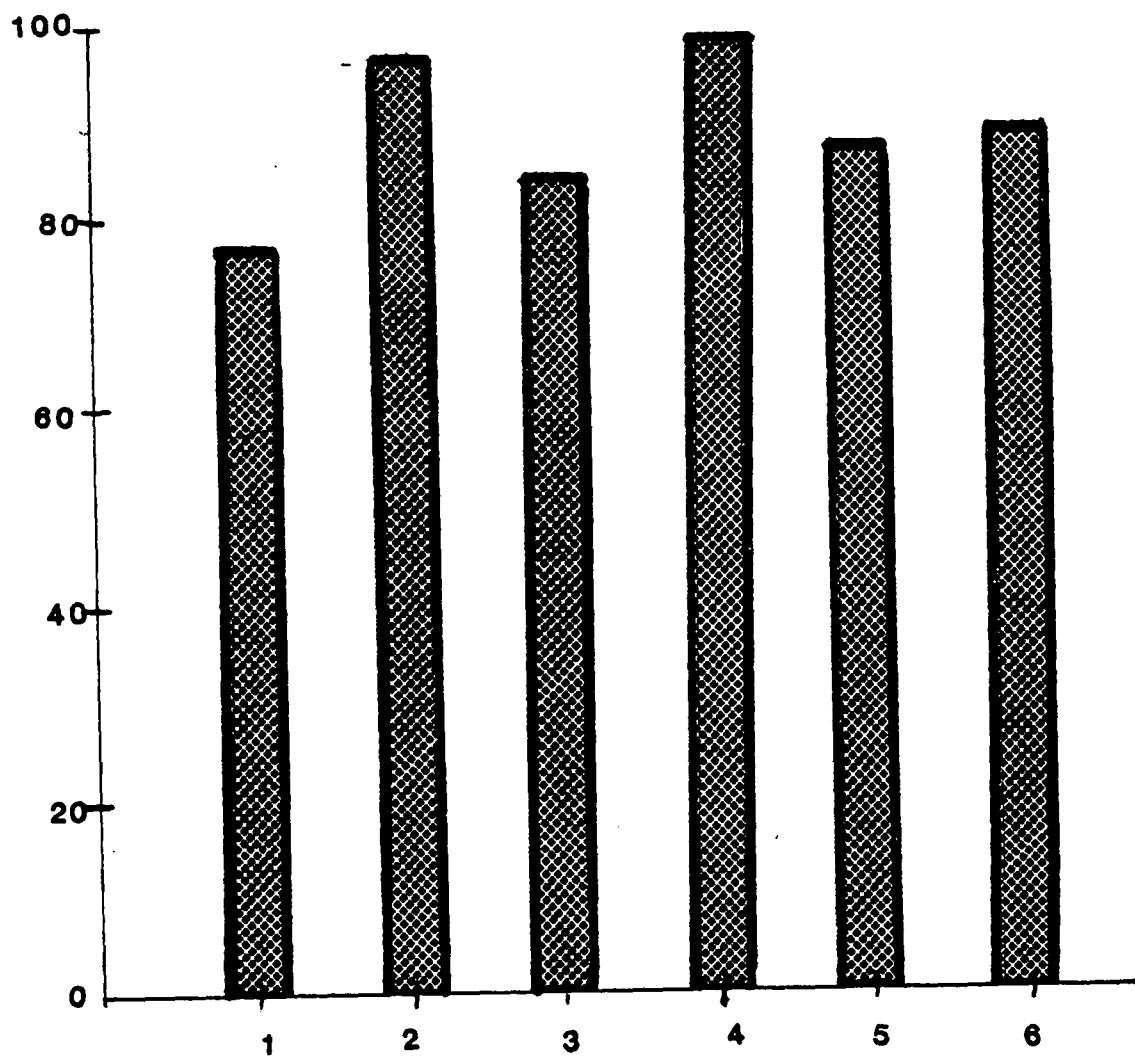


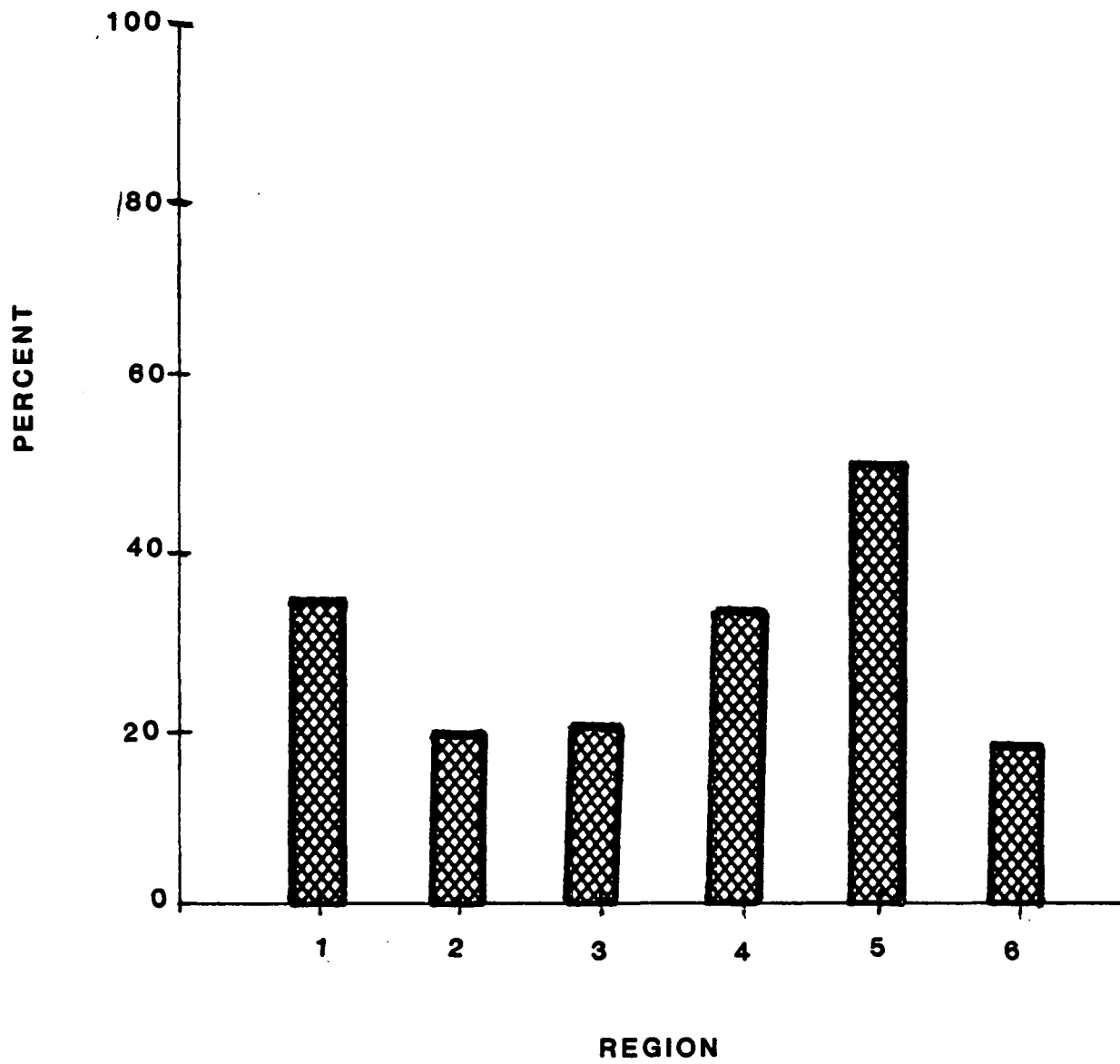
FIGURE 14 FILE QUALITY



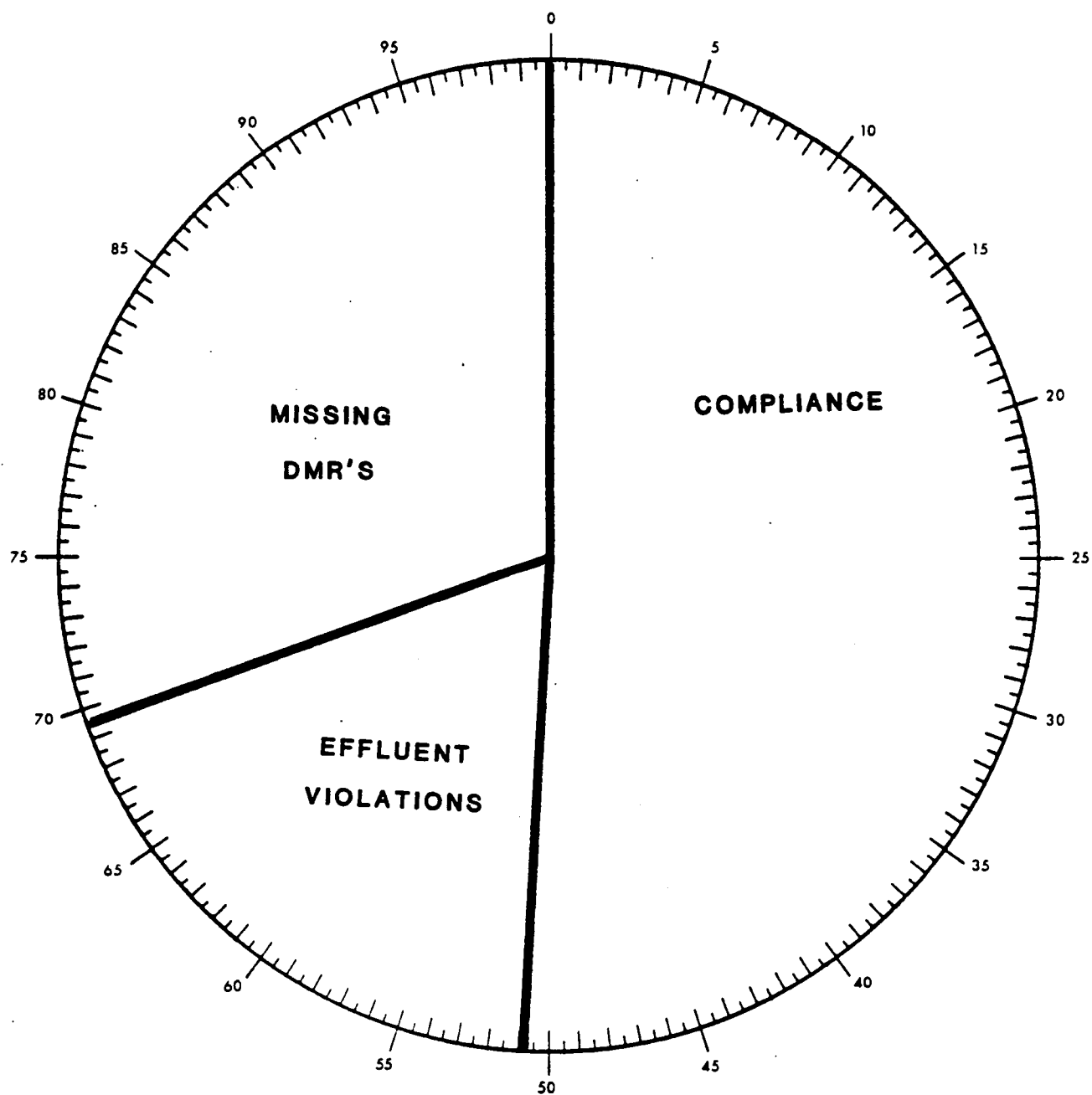
REGION

$$\% \text{ FILE QUALITY} = \frac{\text{DER MISSING DMR'S} - \text{EPA FOUND DMR'S} \times 100}{\text{DER MISSING DMR'S}}$$

**FIGURE 15 MISSING DMR'S**

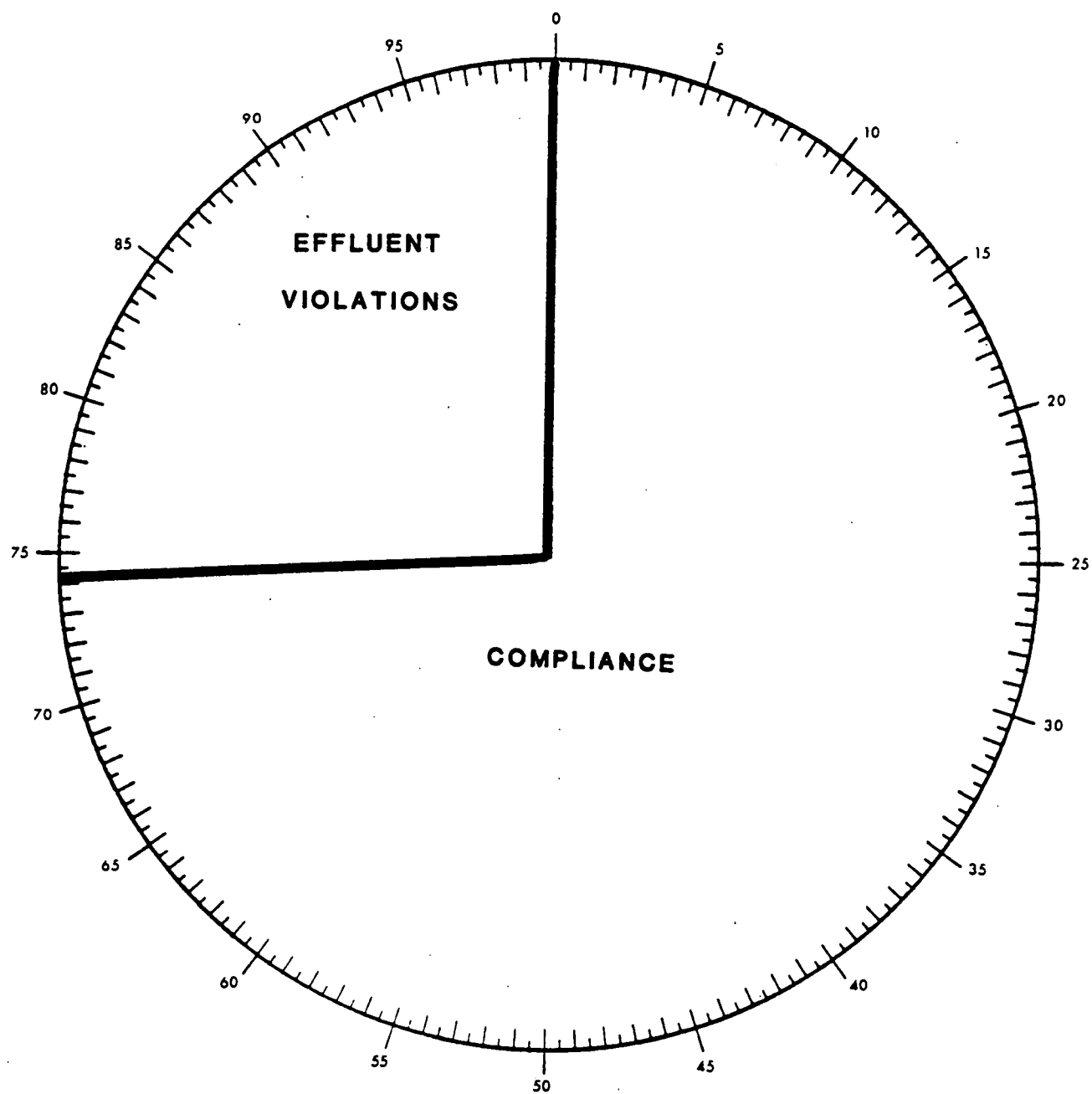


**FIGURE 16 STATEWIDE SUMMARY**



**FEDERAL FACILITIES NOT INCLUDED**

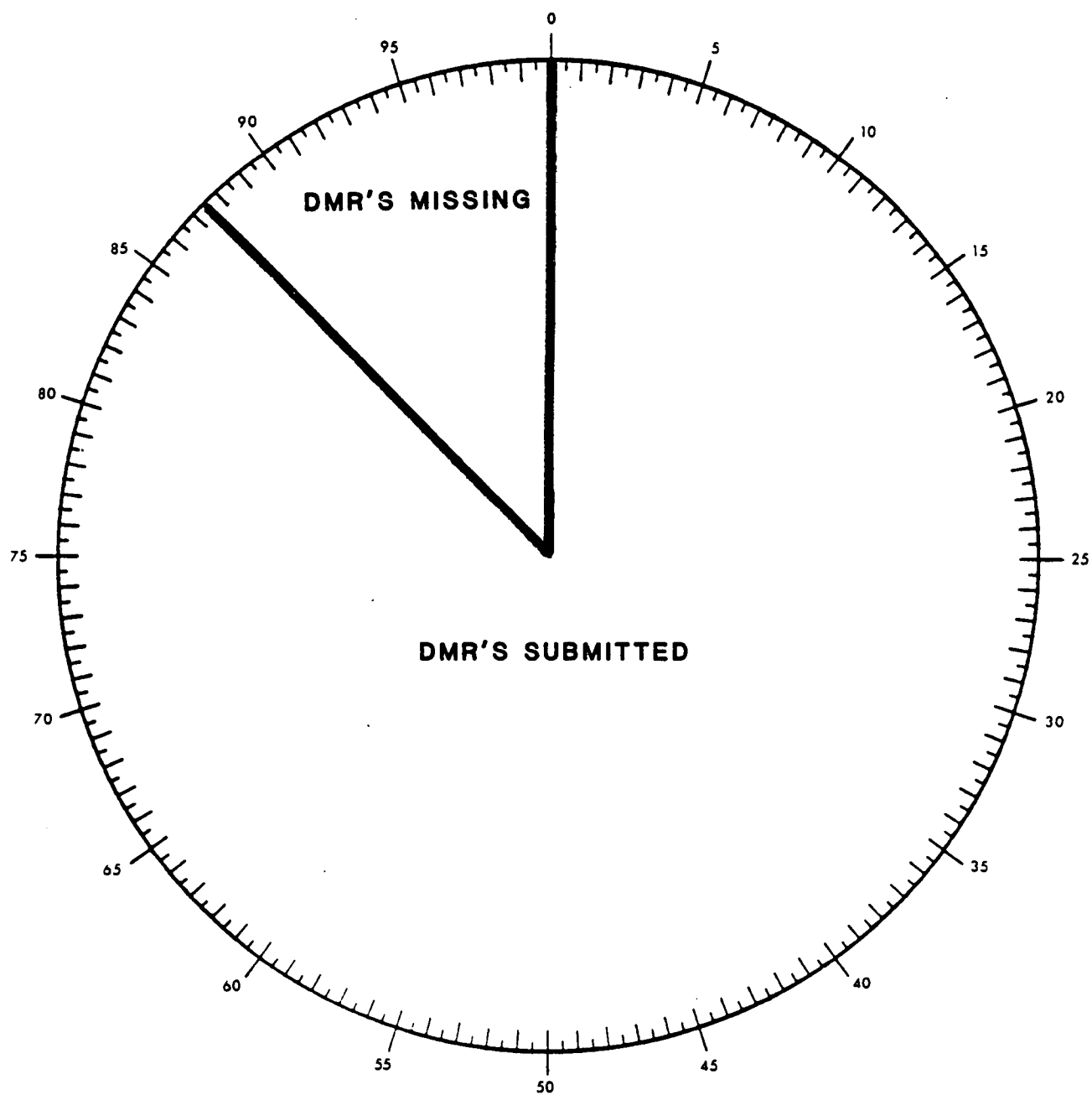
**FIGURE 17 STATEWIDE SUMMARY  
FACILITIES SUBMITTING DMR'S**



**FEDERAL FACILITIES NOT INCLUDED**



**FIGURE 18 FEDERAL FACILITIES**



## Appendix 2

### TABLES

Table 1 P.L. 92-500 Facilities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
1	13	61.5	7.7	30.8
2	8	12.5	12.5	75
3	15	73.3	20	6.7
4	6	50	16.7	33.3
5	14	50	21.5	28.5
6	8	62.5	25	12.5
State	64	54.7	18.8	26.5

Table 2 Primary Facilities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
1	6	66.7	33.3	0
2	2	50	50	0
3	4	50	0	50
4	2	50	50	0
5	4	50	25	25
6	4	50	25	25
State	22	54.5	27.3	18.2

Table 3 Secondary Facilities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
1	5	20	60	20
2	3	100	0	0
3	4	50	25	25
4	3	33.3	33.3	33.3
5	7	28.6	57.1	14.3
6	6	50	50	0
State	28	42.9	42.9	14.2

Table 4 Minor Municipalities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
1	5	40	40	20
2	4	75	0	25
3	7	28.6	42.8	28.6
4	5	80	20	0
5	13	38.5	61.5	0
6	6	50	33	17
State	40	47.5	40	12.5

Table 5 P.L. 92-500 Facilities Submitting DMR's

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
1	12	66.7	33.3
2	7	14.3	85.7
3	12	91.7	8.3
4	5	60	40
5	10	70	30
6	6	83.7	16.3
State	52	67.5	32.5

Table 6 Primary Facilities Submitting DMR's

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
1	4	100	0
2	1	100	0
3	4	50	50
4	1	100	0
5	3	66.7	33.3
6	3	66.7	33.3
State	16	75	25



Table 7 Secondary Facilities Submitting DMR's

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
1	2	50	50
2	3	100	0
3	3	66.7	33.3
4	2	50	50
5	3	66.7	33.3
6	3	100	0
State	16	75	25

Table 8 Minor Municipalities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
1	3	66.7	33.3
2	4	75	25
3	4	50	50
4	4	100	0
5	5	100	0
6	4	75	25
State	24	79.2	20.8

Table 9 Federal Facilities

<u>Region</u>	<u>Number Facilities</u>	<u>Facilities Submitting DMR's</u>	<u>Missing DMR's</u>
1	1	100	0
2	1	100	0
3	2	100	0
4	4	75	25
5	0		
6	0		
State	8	87.5	12.5

Table 10 Average of Regional Facilities

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
1	29	50.2	28.6	21.2
2	17	47.1	11.8	41.1
3	30	56.6	23.3	20.1
4	16	56.3	31.9	11.8
5	38	42.1	44.7	13.2
6	24	54.2	33.3	12.5
State	154	50.7	30.5	18.8

Table 11 Average of Regional Facilities Submitting DMR's

<u>Region</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
1	21	71.3	28.7
2	15	53.3	46.7
3	23	73.9	26.1
4	12	75	25
5	21	76.2	23.8
6	16	81.3	18.7
State	108	74.1	25.9

Table 12 State Average of Facilities

<u>Type Facility</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Facilities Missing DMR's</u>	<u>Effluent Violations</u>
P.L. 92-500	64	54.7	18.8	26.5
Primary	22	54.5	31.9	13.6
Secondary	28	42.9	42.9	14.2
Minor Municipalities	40	47.5	40	17.5
Total	154	50.7	30.5	18.8

Table 13 State Average of Facilities Submitting DMR's

<u>Type Facility</u>	<u>Number Facilities</u>	<u>Compliance</u>	<u>Effluent Violations</u>
P.L. 92-500	52	67.5	32.5
Primary	16	75	25
Secondary	16	75	25
Minor Municipalities	24	79.2	20.8
Total	108	74.1	25.9

Table 14 File Quality

<u>Region</u>	<u>DER MISSING Files</u>	<u>EPA MISSING Files</u>	<u>File Quality</u>
1	122	91	75
2	43	41	95
3	78	65	83
4	75	73	97
5	211	181	86
6	59	52	88



Table 15 DMR Submittal

<u>Region</u>	<u>Number DMR's</u>	<u>DMR's Missing</u>	<u>Percent Missing</u>
1	360	122	34
2	228	43	19
3	384	78	20
4	228	75	33
5	432	211	49
6	324	59	18

Appendix 3

LETTERS AND MEMOS

Region III Strategy - Minor NPDES Discharger Compliance

Charles W. Sapp  
Chief, Water Permits Branch (3WM50)

Greene A. Jones  
Director, Water Management Division (3WM00)

JAN 31 1983

2/3/83

The following is a strategy for analyzing and improving compliance rates of minor discharges in each State in Region III.

The approximate 13,300 minor dischargers can be divided into four categories:

1. POTW - completed facilities funded under PL 92-500 - included in the Administrator's Accountability System - 116.
2. POTW - not funded under PL 92-500 - approximately 1360.
3. Primary Industry - a) approximately 940 non-coal mines.  
b) approximately 5300 coal mines.
4. Secondary Industry - approximately 5600.

The general strategy to assess and improve the current compliance status is as follows:

1. During December 1982, Water Permits Branch reviewed its files and contacted the Delegated States to obtain compliance status of completed POTWs funded under P.L. 92-500 for the Administrator's Accountability System. An effort to have the States inspect or otherwise evaluate 100% of the completed facilities will be made.
2. Regional Counsel will review the MOAs, NPDES regulations, and existing correspondence to determine Regional authority to request information in Delegated States. This is to be done by February 15, 1983.
3. Concurrently with Regional Counsel review, Water Permits Section Chiefs will contact the Delegated States to express our general interest in minor dischargers and discuss their compliance and enforcement programs in this area.
4. By February 28, 1983, Water Permits Branch will schedule audits, on a random basis, of information in each Delegated State to determine compliance status in the following manner:
  - a) Funded POTWs 100% (to establish reporting baseline)
  - b) Unfunded POTWs < 5%
  - c) Primary Industries < 5% other than coal mines
  - d) Secondary Industries  $\approx$  2%

Review of selected Regional files will commence immediately upon selection, and selected State files will be reviewed during our normal audits. Where noncompliance or nonreporting is noted, the Delegated State will be advised in writing, asked to follow up and report actions and results to us. In the case of serious violations, we can initiate enforcement actions if the State fails to achieve compliance in a reasonable time, i.e. six months.

5. In those States where EPA still has primacy, District of Columbia and Federal Facilities in Delaware & Maryland, Water Permits Branch staff will review our files and in instances of noncompliance or nonreporting, will initiate direct contacts with the permittees, either by telephone or letter. There are approximately 100 dischargers in this category, and we would expect to overview 25 of them by March 1, 1983.
6. Once our initial assessments of the States' programs and compliance rates are completed, specific strategies for each state and broad categories of discharges will be developed or modified in cooperation with the affected State. Broad categories are:
  - a) Funded POTWs
  - b) Non-coal mine primary industries
  - c) Coal Mines
  - d) Unfunded POTWs and secondary industries.

These strategies will be based on the information obtained during our reviews plus the draft National Municipal Policy and Environmental Management Reports as they are developed, and it is anticipated they would be implemented through the SEA and §106 grant in FY84.

It is anticipated that EPA's expression of interest in the various areas will be sufficient to cause a definite increase in the compliance rate of minor dischargers in Region III. The information available in the Regional Office concerning current minor permittee compliance is very limited. This strategy includes the use of statistically sound sampling to determine baseline status.

Enclosure

bcc: Len Mangiaracina  
Fred Grant  
Joe Galda  
Bill Bulman  
Stan Laskowski  
Jim Burke

Larry Benning  
Joe Davis  
Jeff Hass  
Bob Collings

Minor Facilities

	Municipals		Primary		Secondary	Total
	Non 92-500	92-500	Non-Coal	Coal		
<del>DE</del>	<del>0</del>	<del>0</del>	<del>1</del>	<del>0</del>	<del>1</del>	<del>5</del>
<del>DE</del>	<del>7</del>	<del>0</del>	<del>25</del>	<del>20</del>	<del>54</del>	<del>108</del>
<del>MD</del>	<del>264</del>	<del>14</del>	<del>153</del>	<del>220</del>	<del>437</del>	<del>1738</del>
PA	625	65	509	2739	2204	6142
<del>VA</del>	<del>300</del>	<del>10</del>	<del>170</del>	<del>302</del>	<del>155</del>	<del>414</del>
<del>WV</del>	<del>250</del>	<del>18</del>	<del>75</del>	<del>2075</del>	<del>293</del>	<del>3005</del>
TOTAL	1362	116	939	5336	5564	13317
PA%	46	56	54	51	40	46

note: coal data erroneous for PA. Only facilities coded into PCS shown. *Fe*

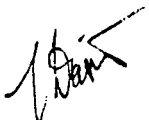
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

SUBJECT: Minor NPDES Discharger Strategy

DATE: FEB 24 1983

FROM: Joseph Davis  
Chief, PA Section, WPB



TO: PA Section Technical Staff

Appended you will find a Branch strategy for analyzing and improving rates for minor dischargers in Pennsylvania. We must add another category:

4(e) Federal facilities 100%  
(to establish a reporting baseline)

Be sure to note the February 28, 1983 deadline for scheduling audits. The West Team is going out during the weeks of March 14 and March 21, 1983. I would like to schedule Norristown during the week of March 28, 1983 and Wilkes-Barre/Harrisburg during the weeks of April 4 and 11, 1983. Please notify the Regional managers that, although we will be in the Region for two to four days, most of the time will be used for looking at selected files with minimum DER personnel participation. Only one day will be required for the usual enforcement discussions.

The merits of this method of operation are not a matter for discussion. We will follow the strategy to the letter. Agency policy is not made at the staff level, so let's make this work. It should be obvious to all that this methodology will provide a good data base for future reporting of compliance rates, and at the same time, we are performing our required NPDES overview audits of the state-run program.

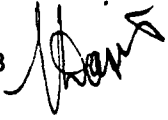
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

SUBJECT: PA Audit "Yardsticks"

DATE: MAY 5 1983

FROM: Joseph Davis  
Chief, PA Section, WPB



TO: Section Staff

As we discussed, the following criteria will be used--without additional judgements etc.--for establishing the compliance status of the audited facilities:

1. Note any violation of the permit without excuses.
2. Note any violations at or greater than the level in the attached draft definition of significant noncompliance.
3. A facility that was in compliance on the last six DMR's is to be counted in compliance. This could be July through December, or August through January, or September through February. Prior violations were obviously resolved. A comment should so note.
4. Nonsubmittal of DMR's is to be counted as a violation in both systems (during the period of January 1982 - December 1982) unless eleven other DMR's show full compliance. The assumption is made that this is a clerical or Postal Service error and we'll give the permittee the benefit of the doubt.

Repeating, then, we'll have three sets of numbers: in compliance, in noncompliance and in significant noncompliance.

A chart format is the next issue to be resolved. This can be developed after we know the approximate statistics based on the preceding.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

MEMORANDUM

OFFICE OF  
WATER

SUBJECT: Definition of Significant Noncompliance

FROM: Martha Prothro, Acting Director  
Office of Water Enforcement and Permits

TO: Bruce Barrett, Acting Assistant Administrator  
Office of Water

Attached for your signature is the definition of significant noncompliance for use in evaluating NPDES permit violations. This fulfills the requirement in the Administrator's accountability system that a procedure be developed to identify those permit violations which are of sufficient magnitude and/or duration to be considered of major concern to the regulatory agency. The definition will be used to report national levels of compliance in the NPDES program and to evaluate the progress of the NPDES program. It does not (indeed, could not) affect in any way the requirements of statute or regulations which apply to NPDES permit holders.

BACKGROUND

The first draft of the definition was developed by the Enforcement Division of this Office (Memorandum August 11, 1981), based on discussions with the EPA regional offices and NPDES States. A work group of compliance managers from the EPA regional offices developed the definition from State and EPA comments. A draft was also presented to the Compliance Task Force of ASIWPCA which endorsed the general definition.

The EPA work group established the following guidelines for the definition of significant noncompliance: (1) it should be simple to use; (2) it must be acceptable to States and program reviewers; and (3) it should be reasonably flexible. We have attempted to incorporate these concerns throughout the draft definition. For example, the draft definition could be used in manual or computerized screening of Discharge Monitoring Reports and Compliance Schedule Reports. The definition's criteria for evaluating violations are the same for major and minor facilities, for interim and final permit limits, and for mass loading and concentration based effluent limits. Separate criteria are used, however, to define significant noncompliance for schedule violations for municipals and non-municipals because of the special circumstances involving funding of municipal treatment facilities.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DRAFT

OFFICE OF  
WATER

MEMORANDUM

SUBJECT: Definition of Significant Noncompliance  
for the NPDES Program

FROM: Frederic A. Eidsness, Jr.  
Assistant Administrator for Water (WH-556)

TO: Regional Administrators  
State NPDES Program Directors

Over the past few years, the compliance personnel of various Regions and States have expressed concern about the Agency's emphasis on reporting and resolving instances of noncompliance which are of minor importance. "Minor" violations of NPDES requirements, although important in one sense, do not always reflect the real gains of the NPDES program. It is important, given the large number of NPDES permittees and the limited enforcement/compliance resources, that we focus our efforts to resolve truly serious problems. Therefore, in cooperation with EPA Regions and NPDES States, we have developed the definition of significant noncompliance as an administrative tool for providing this focus. The Office of Legal and Enforcement Counsel has also cooperated in and concurred with the development of this guidance.

Attached is the draft definition of significant noncompliance. This definition will be used to identify those permit violations which are of sufficient magnitude and/or duration to be considered of major concern to the regulatory agency, to report national levels of compliance in the NPDES program, and to evaluate the progress of the NPDES program.

Previously, separate definitions were used to prepare the Quarterly Noncompliance Report (QNCR), to report national non-compliance levels and to review the progress of the NPDES program. Unfortunately, these separate definitions produced different levels of compliance and frequently included violations which were insignificant. The definition of significant noncompliance should resolve these previous problems because: 1) the definition will be used for all reporting of noncompliance in the NPDES program; and, 2) the definition allows the regulatory agency to list all instances of noncompliance which are considered to be of major concern.

The definition represents a consensus of the comments received from NPDES States and EPA Regional offices. We wish to thank you all for your time and cooperation in developing this definition.

Many commenters recommended that we modify the NPDES regulations pertaining to reporting noncompliance (40 CFR 122.18) to incorporate this definition. These modifications have been included in the draft regulations which will receive public comment. The definition of significant noncompliance will become final when the final regulations are published. In the interim period, you may wish to compare the compliance levels obtained using the definition of significant noncompliance with those obtained using the current QNCR regulations. This experience should assist the transition between definitions and provide a basis for valuable comments on the draft definition.

The Permit Compliance System is being updated to include automated methods to screen self-monitoring data for instances of significant noncompliance. These methods will be based on the definition of significant noncompliance. We will advise you when this option is available.

Attachment

cc: Regional Counsel  
Water Management Division Directors

DRAFT

## DEFINITION OF SIGNIFICANT NONCOMPLIANCE IN THE NPDES PROGRAM

A definition of significant noncompliance is needed for the NPDES program to provide consistent information on the compliance status of permitted facilities and to evaluate changes in compliance status. This definition will be used as part of the administrative procedure for screening NPDES self-monitoring data and reporting instances of noncompliance which are of major concern to the regulatory agency.

It is important to note that any violation of an NPDES permit is a violation of the Clean Water Act (CWA) for which the permittee is strictly liable. The designation of "significant noncompliance" indicates a violation is of sufficient magnitude and/or duration to be considered among the regulatory agency's priorities for regulatory review and/or response. An agency's decision as to what enforcement action, if any, should be taken in such cases must be based on an analysis of all of the facts and relevant legal provisions involved in any particular case.

The categories of significant noncompliance are: violations of requirements resulting from previous enforcement action, violations of permit effluent limits, and violations of permit compliance schedules. Any unauthorized discharge or bypass considered significant by the NPDES Program Director (or Designee) will also be reported as significant noncompliance. Additionally, the Director of an NPDES program may designate any instance of noncompliance which he/she considers to be significant.

The regulatory agency reserves the right to take any action against NPDES permit violations as prescribed by the CWA regardless of whether it is or can be defined as significant noncompliance. This right also applies to any procedures or policies developed to implement the definition of significant noncompliance.

### I. Violations of Previous Enforcement Actions

Violation of a requirement imposed in an enforcement action such as a consent decree or administrative order, except as noted below, is considered to be significant noncompliance.

## II. Violations of Compliance Schedules

Schedule violations, including portions of 309(a)(5)(A) orders which pertain to compliance schedules, can be classified as "significant" for both POTWs and non-POTWs. Assessing the status of compliance of non-POTWs is a relatively straightforward matter because there are fewer variables involved in their construction programs than for POTWs. For those POTWs which rely upon the Federal construction grants process to assist in funding, the entire grant process (including planning, design, and construction) must be reviewed to determine if the municipal facility is making acceptable or unacceptable progress. If a POTW facility is making unacceptable progress, its noncompliance is considered significant. For POTWs not in the Federal grants process and non-POTWs, schedule violations which have not been resolved (returned to compliance with schedule requirements) within 90 days are considered to be significant noncompliance.

## III. Violations of Permit Effluent Limits

Cases of significant noncompliance for permit effluent limits are defined according to the magnitude and/or duration of the violation. Effluent violations should be evaluated on a parameter-by-parameter and outfall-by-outfall basis. Three subcategories have been created for effluent violations, as follows:

### a. Effluent Criteria for Single Events and Short-Term Limits

Single event violations (i.e., of daily maximum limits) and short term violations (i.e., of seven-day averages) are discretionary with respect to their designation as significant noncompliance. Generally, however, any permit violation is significant which has the potential to cause or has actually caused adverse environmental effects, (e.g., fish kills, oil sheens) or poses a human health hazard (e.g., spills of carcinogenic, radioactive or mutagenic substances). The Director also may consider the significance of violations detected during compliance inspections by using a single event criterion.

b. Effluent Criteria for the Magnitude and Duration of  
Monthly Average Permit Limits

Significant noncompliance for monthly average limitations is based on exceeding Technical Review Criteria (TRC) (magnitude) for a specified time period (duration). The TRC's are for two groups:

Group I - Inorganic and Oxygen Demanding Pollutants (such as BOD, COD, TSS, nutrients)	TRC=1.4
---	---------

Group II - Toxic Pollutants (such as heavy metals, cyanide, and organics)	TRC=1.2
---	---------

The duration is evaluated for any consecutive six months. For all permittees, significant noncompliance is exceedance of the TRC for the monthly average for any two months in a six-month period.

c. Effluent Criteria for Chronic Violations

In some cases, a permittee will constantly violate the monthly average permit limit but not exceed the TRC. These chronic violations would be considered significant noncompliance if the monthly average permit limit were exceeded any four months in a six-month period.

GROUP I - Inorganic and Oxygen Demanding Pollutants      TRC=1.4

Oxygen Demand

Biochemical Oxygen Demand  
Chemical Oxygen Demand  
Total Oxygen Demands  
Total Organic Carbon  
Other

Solids

Total Suspended Solids (Residues)  
Total Dissolved Solids (Residues)  
Other

Nutrients

Phosphorus Compounds  
Nitrogen Compounds  
Other

Detergents and Oil

MBAS  
NTA  
Oil and Grease  
Other detergents or algicides

Minerals

Calcium  
Chloride  
Fluoride  
Magnesium  
Sodium  
Potassium  
Sulfur  
Sulfate  
Total Alkalinity  
Total Hardness  
Other Minerals

Metals

Aluminum  
Cobalt  
Iron  
Vanadium

Group II - Toxic Pollutants      TRC=1.2

Heavy Metals (all forms)

Antimony  
Arsenic  
Beryllium  
Cadmium  
Chromium  
Copper  
Lead  
Nickel  
Mercury  
Selenium  
Silver  
Thallium  
Zinc

Inorganic (nonconventional)

Cyanide  
Total Residual Chlorine

All Organics except those specifically listed in Group I.  
The criteria for fecal coliform violations are discretionary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer To: 3WM52

MAR 18 1983

Mr. C. T. Beechwood  
Regional Water Quality Manager  
PA Dept. of Environmental Resources  
1875 New Hope Street  
Norristown, PA 19401

Dear Mr. Beechwood:

This letter is to confirm our plans to visit your office on March 29 and 30, 1983. We may also want to return on April 1 if we are unable to complete our reviews.

We plan to discuss with your staff the major facilities listed on the most recent QNCR. Of particular concern are the following:

PA0026646	Antietam Valley Mun. Auth.	<u>County</u>
PA0024180	Berks-Montgomery Mun. Auth.	Berks
PA0026042	Bethlehem City	Montgomery
PA0026450	Bristol Twp. Authority	Northampton
PA0025917	Chalfont - New Britain Jt. S.A.	Bucks
PA0027103	DELCORA	Bucks
PA0026531	Downingtown STP	Delaware
PA0026948	Falls Township Authority	Chester
PA0026247	Hatfield Twp. M.A.	Bucks
PA0026701	Morrisville Borough M.A.	Montgomery
PA0027421	Norristown Boro	Bucks
PA0020290	Quakertown Boro	Montgomery
PA0026549	Reading City	Bucks
PA0027383	Southwest Delaware Co. M.A.	Berks
PA0027031	West Chester - Goose Creek	Delaware
PA0026018	West Chester - Taylor Run	Chester
PA0011371	Baldwin Hardware Manuf. Corp.	Chester
PA0022047	Crompton & Knowles Corp.	Berks
PA0012823	PP & L Martins Creek	Berks
PA0013315	Publicker Dist. - Div. Continental	Northampton
		Philadelphia

We also plan to review the files for the following minor municipal facilities which have been funded under public law 92-500 and have been certified complete by the Corps of Engineers:

*Joe Mc*

		<u>County</u>
PA0070351	Amity Township M.A.	Berks
PA0022543	Bally Municipal Authority	Berks
PA0023540	Berks-Montgomery Mun. Auth.	Berks
PA0024376	Boyertown Boro	Berks
PA0070424	Caernarvon	Berks
PA0024422	Lower Salford Township	Montgomery
PA0070254	Lynn Township Sanitary Auth.	Lehigh
PA0070271	Maidencreek Township M.A.	Berks
PA0020699	Montgomery W & S	Lycoming
PA0044776	Northwestern Chester County	Chester
PA0024961	Oley Township M.A.	Berks
PA0024074	Shoemakersville M.A.	Berks
PA0020711	Topton Boro M.A.	Berks

At random we selected the following minor facilities for file review during our visit:

Primary Industrial Minors

PA0012033	✓Valley Paper Mills Modena Plant	Chester
PA0012017	✓Allied Corp. - FXD Plant	Philadelphia
PA0011045	✓Pycofoam Corp., Norristown	Montgomery
PA0012980	✓G.O. Carlson, Inc. - Viaduct Plant	Chester
PA0051080	✓Thompson-CSF Components Corp.	Montgomery
PA0012475	OK <del>MET ED Portland</del> <del>MAJOR</del>	<del>Northampton</del>
PA0050369	✓Unitog Company	Bucks
PA 51128	✓Reilly - Whiteman	Montgomery

Secondary Industrial Minors

PA0070106	✓Exxon Company, Tuckerton Terminal	Berks
PA0070416	✓Conrail-Beth Diesel Terminal	Northampton
PA0050296	✓Monarch Development Corp.	Montgomery
PA0050687	✓Bethayres Valley Apts.	Montgomery
PA0029912	✓Embreeville State Hospital	Chester
PA0070319	✓Reading-Berks Joint Fire Training	Berks



Municipal Minors

PA0020231	✓ Hatfield Boro	County
PA0028355	✓ Eddystone Boro	Montgomery
PA0051004	✓ Lower Salford Township	Delaware
PA0070149	✓ Leesport Boro	Montgomery
PA0041742	✓ Nazareth Boro Mun. Auth.	Berks
		Northampton

Our file review will also include the following federal facilities which are in noncompliance either due to effluent violations or failure to submit discharge monitoring reports:

PA0036447	✓ Naval Ship Engineering Center	Phila.
PA0046264	✓ U.S. Army Corps Eng. - Blue Marsh	Berks

Permit to be suspended -

Sincerely yours,

ORIGINAL SIGNED BY

J. DAVIS  
Joseph Davis, Chief  
Pennsylvania Section  
Water Permits Branch  
Water Management Division

cc: Walter Stanley, Norristown DER

3WM52 Trainer/dl:7094:3/17/83							
Symbol	3WM52	21	23				
Surname	Trainer	3	14				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer To: 3WM52

MAR 1 1983

Mr. Lawrence A. Pawlush  
Regional Water Quality Manager  
PA Dept. of Environmental Resources  
90 East Union Street - 2nd Floor  
P.O. Box 659  
Wilkes-Barre, PA 18701

Dear Mr. Pawlush:

This letter will confirm our planned visit to your office on April 5, 6 and 7, 1983.

We plan to discuss with your staff the following major facilities listed on the most recent QNCR.

		<u>County</u>
PA0028576	Clarks Summit - S. Abington Jt. Sanitary Authority	Lackawanna
PA0026221	Dallas Area Mun. Auth.	Luzerne
PA0020168	Stroudsburg Boro	Monroe
PA0026921	Greater Hazleton Joint S.A.	Luzerne
PA0027065	Lackawanna River Basin S.A.	Lackawanna
PA0027090	Lackawanna River Basin S.A.	Lackawanna
PA0029017	Schuylkill Haven Mun. Auth.	Schuylkill
PA0026492	Scranton City S.A.	Lackawanna
PA0012742	Atlas Powder Co.	Schuylkill
PA0044920	Lehighon Electronics Inc.	Carbon
PA0012963	Packaging Corp. of America	Monroe
PA0008231	Penn Dye & Finishing Co., Inc.	Schuylkill
PA0010987	Tobyhanna Army Depot	Monroe

We also plan to review the files for the following municipalities which have been funded under public law 92-500 and which are certified by the Corps of Engineers as being complete:

PA0042048	Conygam Boro Authority	Luzerne
PA0021873	Jim Thorpe Mun. Authority	Carbon
PA0020915	Pine Grove Boro Authority	Schuylkill
PA0046272	Porter-Tower Joint Authority	Schuylkill

		<u>County</u>
PA0043044	Ringtown Boro	Schuylkill
PA0042951	Tremont Municipal Authority	Schuylkill
PA0023736	Tri Boro Municipal Authority	Susquehanna
PA0020940	Tunkhannock Boro M.A.	Wyoming
PA0046353	Waymart M.A.	Wayne

At random we selected the following minor facilities for file review:

Primary Industrial Minors

		<u>County</u>
PA0008907	✓ Harte Company, Inc.	Luzerne
<del>PA0008664</del>	UGI, Hunlock (MAJOR POWER PLANT)	Luzerne
PA0070203	✓ CRAFTEX MILLS INC	Schuylkill

Secondary Industrial Minors

PA0060381	✓ Wyoming County Commissioners	Wyoming
PA0070009	✓ Cove Ski Village LEISURE EQUIPES CO.	Schuylkill
PA0060194	✓ Blue Ridge School District	Susquehanna
PA0041076	✓ PA State Police - Swiftwater Station	Monroe

*Change name to Schep's Cheese Co.*

Minor Municipals

PA0020494	✓ Lehighton Boro	Carbon
PA0029025	✓ Clarks Green	Lackawanna
PA0060330	✓ Hawley Area Authority	Wayne
PA0070386	✓ Shenandoah Mun. Authority	Schuylkill

Our file review will also include the following federal facilities which are in noncompliance either due to effluent violations or failure to submit discharge monitoring reports:

PA0010987	✓ Tobyhanna Army Depot	Monroe
<del>PA0043184</del>	Tobyhanna Army Depot	Monroe

*cancelled application file*

*permit will be re-issued shortly (6mo)*

Sincerely yours,

ORIGINAL SIGNED BY

Joseph Davis, Chief  
PA Section  
Water Permits Branch  
Water Management Division

cc: Paul J. Koval, Wilkes-Barre, DER

3WM52 Trainer/dl:7094:3/18/83

CONCURRENCES

Symbol	Surname						
3WM52	Trainer						



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer To: 3WM52

MAR 18 1983

Mr. James T. Flesher  
Acting Water Quality Manager  
PA Dept. of Environmental Resources  
407 South Cameron Street  
Harrisburg, PA 17120

Dear Mr. Flesher:

As you know, we will be visiting your office on April 12, 13 and 14, 1983. We plan to discuss with your staff the following major facilities which were listed on the QNCR.

1. Altoona City Auth. - East	PA0027014
2. Altoona City Auth. - West	PA0027022
3. Chambersburg Borough	PA0026051
4. Ephrata Borough	PA0027405
5. Hampden Township Sewer Auth.	PA0028746
6. Hanover Boro Authority	PA0026875
7. Lancaster City Sewer Auth. - North	PA0026719
8. Lancaster City Sewer Auth. - South	PA0026743
9. Lititz Sewer Authority	PA0020320
10. Myerstown Boro Sewer Authority	PA0021075
11. Palmyra Boro Authority	PA0024287
12. Penn Township	PA0037150
13. Swatara Township Authority	PA0026735
14. Tyrone Boro	PA0026727
15. Washington Twp. Mun. Authority	PA0080225
16. York City Sewer Authority	PA0026263
17. Appleton Papers	PA0008265
18. Bethlehem Steel - Steelton	PA0008303
19. Consolidated Rail Corp. - Enola	PA0009229
20. Itt - Grinnell	PA0080195
21. Holly Milk Co-operative	PA0044911
22. Lancaster Metal Science Corp.	PA0080063
23. Musselman's, MFP, Inc.	PA0008770
24. United Piece Dye Works	PA0009172
25. Wyeth Laboratories, Inc.	PA0013862
26. Letterkenny Army Depot	PA0010502

We also plan to review the files of those minor municipal facilities which have been funded under Public Law 92-500. In these cases construction has been certified as completed by the Corps of Engineers.

Public Law 92-500 Minor Municipal Facilities

1. Freedom Township W.S.A.	✓ PA0110361	Blair County
2. McVeytown Boro	✓ PA0028993	Mifflin County
3. Millerstown Mun. Auth.	✓ PA0021849	Perry County
4. Mt. Union Mun. Auth.	✓ PA0020214	Huntington County
5. New Oxford Mun. Auth.	✓ PA0020923	Adams County
6. N. Lancaster County Auth.	✓ PA0080438	Lancaster County
7. Petersburg Boro	✓ PA0111350	Huntington County
8. Reading Twp. Mun. Auth.	✓ PA0036889	Adams County
9. S. Middleton Twp. Mun. Auth.	✓ PA0044113	Cumberland County
10. Thompsontown Mun. Auth.	✓ PA0111422	Juniata County
11. York Springs Mun. Auth.	✓ PA0043567	Adams County
12. Alexandria Boro, Porter Township S.W.	✓ PA0043443	Huntington County
13. Annville Township	✓ PA0021806	Lebanon County
14. Antrim Twp. Mun. Auth.	✓ PA0080519	Franklin County
15. Hamiltonban Township	✓ PA0040304	Adams County

At random, we selected the following minor facilities for file review during our visit:

Primary Industry Minor Facilities

1. Kimberly-Clark Corp. Mt. Holly	✓ PA0008150	Cumberland County
2. National Standard Co.	✓ PA0042781	Lancaster County
3. Bowen McLaughlin York Co.	✓ PA0009253	York County
4. Safe Harbor	✓ PA0032379	Lancaster County

Note - Surface mining had  
all the substitute clay  
man. plants (quarries)

### Secondary Industrial Minor Facilities

- SURFACE MINING**
- |  |                        |                         |
|--|------------------------|-------------------------|
| 1. Mt. Pannell Fisheries               | ✓ PA0042030            | Franklin County         |
| 2. <del>GAF Corp. Charmian Plant</del> | ✓ <del>PA0009059</del> | <del>Adams County</del> |
| 3. Walnut Steam Heat Plant             | ✓ PA0008427            | Dauphin County          |
| 4. Minuet Manor Motel & Restaurant     | ✓ PA0032891            | Blair County            |

- |                               |             |                 |
|-------------------------------|-------------|-----------------|
| 5. Mt. View Elementary School | ✓ PA0030201 | Franklin County |
| 6. Youth Development Center   | ✓ PA0030261 | Perry County    |

~~GENERAL REFRACTORIES PA0008826 BLAIR COUNTY~~

### Municipal Minor Facilities

- |                                 |             |                   |
|---------------------------------|-------------|-------------------|
| 2. GROFFS POTATO CHIPS          | ✓ PA 3464R  | LANCASTER         |
| 1. Roaring Springs Boro         | ✓ PA0020249 | Blair County      |
| 2. Newport Boro. Mun. Auth.     | ✓ PA0021237 | Perry County      |
| 3. Mt. Holly Springs Boro Auth. | ✓ PA0023183 | Cumberland County |
| 4. Upper Allen Twp. Auth.       | ✓ PA0024902 | Cumberland County |
| 5. Bellwood Boro                | ✓ PA0028240 | Blair County      |
| 6. Burnham Boro Sewer Plant     | ✓ PA0038920 | Mifflin County    |
| 7. Hampden Twp. Sewer Auth.     | ✓ PA0080314 | Cumberland County |

### Federal Facilities

- |                           |                 |                   |
|---------------------------|-----------------|-------------------|
| 1. Letterkenny Army Depot | ✓ J ✓ PA0010502 | Franklin County   |
| 2. US Army Seven Points   | ✓ PA0039748     | Huntington County |

Sincerely yours,

ORIGINAL SIGNED BY

J. DAVIS

Joseph Davis, Chief  
Pennsylvania Section  
Water Permits Branch  
Water Management Division

3WM52 Arent/dl:9388:3/17/83

CONCURRENCE

Symbol	3WM52						
Surname	Arent	J. DAVIS	3/17/83				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA PENNSYLVANIA 19106

MAR 11 1983

In Reply Refer To: 3WM52

Mr. William P. Parsons  
Regional Water Quality Manager  
PA Dept. of Environmental Resources  
200 Pine Street  
Williamsport, PA 17701

Dear Mr. Parsons:

As you know, we will be visiting your office on March 24, 1983 and March 25, 1983. We plan to discuss with your staff the major facilities listed on the most recent QNCR. The following table is a listing of those facilities.

Major Facilities On QNCR

- |               |   |
|---------------|---|
| 1. PA0043681  | ✓ Athens-Sayre Joint Authority                        |
| 2. PA0020486  | ✓ Bellefonte Boro                                     |
| 3. PA0023248  | ✓ Berwick Boro  |
| 4. PA0027375  | ✓ City of Dubois                                      |
| 5. PA0025933  | ✓ Loch Haven City Authority                           |
| 6. PA0020273  | ✓ Milton Municipal Sewer Authority <i>see Bill P.</i> |
| 7. PA0037966  | ✓ Moshannon Valley Joint Authority                    |
| 8. PA0026557  | ✓ Sunbury Municipal Authority                         |
| 9. PA0026239  | ✓ University Area Joint Authority                     |
| 10. PA0021687 | ✓ Wellsboro Municipal Authority                       |
| 11. PA0009024 | ✓ GTE Sylvania  |
| 12. PA0009300 | Howes Leather Co., Inc.                               |
| 13. PA0010031 | Pennsylvania Electric Co. - Shawville                 |
| 14. PA0008800 | ✓ Westfield Tanning Company (Eberly)                  |

We also plan to review the files of those minor municipal facilities which have been funded under public law 92-500. In these cases construction has been certified as completed by the Corps of Engineers.

Public Law 92-500 Minor Municipal Facilities

- |              |   |
|--------------|---|
| 1. PA0042722 | ✓ Dushore Sanitary Authority <i>113 Shawville</i>         |
| 2. PA0043583 | ✓ Hartley Township Municipal Authority <i>12 Union</i>    |
| 3. PA0046159 | ✓ Houtzdale Boro Municipal San Auth. <i>023 Shawville</i> |
| 4. PA0110965 | ✓ Mid-Centre Authority <i>Shawville</i>                   |
| 5. PA0045993 | ✓ Ulysses Municipal Authority <i>105 Shawville</i>        |
| 6. PA0043893 | ✓ Western Clinton Municipal Authority <i>035 Clinton</i>  |

At random, we selected the following minor facilities for file review during our visit.

Primary Industrial Minor Facilities

- |              |           |                          |                           |
|--------------|-----------|--------------------------|---------------------------|
| 1. PA0009661 |           | ✓ Arco Radiation Process | 033 <i>Clematis</i>       |
| 2. PA0035467 | (ve code) | ✓ Creative Playthings    | 097 <i>Northumberland</i> |

Secondary Industrial Minor Facilities

- |                |  |                            |                      |
|----------------|--|----------------------------|----------------------|
| 1. PA0013871   |  | ✓ Marine Protein Co.       | - 027 <i>Centre</i>  |
| 2. PA0014575   |  | ✓ Jersey Shore Water       | 003 <i>Allegheny</i> |
| ✓ 3. PA0033316 |  | ✓ Pine Crest Village       | <i>Ligonier</i>      |
| ✓ 4. PA0031381 |  | ✓ State Correctional Inst. | <i>Washington</i>    |
| 5. PA0111406   |  | ✓ Maria Joseph Manor       | - <i>Centre</i>      |
- State Corrd. Institute at Rockview*

Municipal Minor Facilities

- |              |  |                                    |                             |
|--------------|--|------------------------------------|-----------------------------|
| 1. PA0020338 |  | ✓ Kulpmont Boro                    | - 097 <i>Northumberland</i> |
| 2. PA0023582 |  | ✓ Freeburg Boro                    | - 109 <i>Troy</i>           |
| 3. PA0028100 |  | ✓ Turbotville Boro                 | 097 <i>Northumberland</i>   |
| 4. PA0043419 |  | ✓ Coudersport Boro                 | - 105 <i>Potter</i>         |
| 5. PA0111414 |  | ✓ McEwensville Municipal Authority | - <i>Jefferson</i>          |

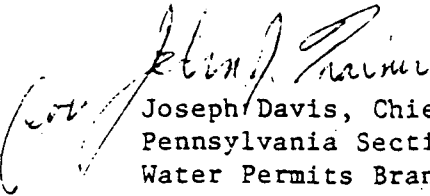
Our file review will also include federal facilities which are in noncompliance. This noncompliance may be due to effluent violations or failure to submit discharge monitoring reports.

Federal Facilities In Noncompliance

- |              |  |                                      |                    |
|--------------|--|--------------------------------------|--------------------|
| 1. PA0039241 |  | ✓ Allenwood Prison Camp Sewer Area   | - 031 <i>Lyons</i> |
| 2. PA0040371 |  | ✓ U.S. Penitentiary, Lewisburg       | - 119 <i>Union</i> |
| 3. PA0046094 |  | ✓ Tioga - Hammond Lake - Ives Run ST | 117 <i>Tioga</i>   |
| 4. PA0060062 |  | ✓ U.S. Dept. Labor Red Rock Job Cor  | 113 <i>Swanton</i> |

We look forward to our visit and our meeting with you and your staff.

Sincerely yours,

  
Joseph Davis, Chief  
Pennsylvania Section  
Water Permits Branch  
Water Management Division



In Reply Refer To: 3WM52

MAR 8 1983

Mr. Stephen F. Pedersen, Water Quality Manager  
Pennsylvania Department of Environmental Resources  
600 Kossman Building  
100 Forbes Avenue  
Pittsburgh, PA 15222

Dear Mr. Pedersen:

As you know, we will be visiting your office on March 14, 1983 through March 17, 1983. We plan to discuss with your staff the major facilities listed on the most recent QNCR. The following table is a listing of those facilities.

Major Facilities on QNCR

- |             |   |
|-------------|---|
| 1. PA25941  | Canonsburg-Houston Joint Authority            |
| 2. PA38181  | Hempfield Township Municipal Authority        |
| 3. PA26034  | City of Johnstown                             |
| 4. PA26069  | Latrobe Municipal Authority                   |
| 5. PA20125  | Monaca Borough Municipal Authority            |
| 6. PA28801  | Montour Township Municipal Authority          |
| 7. PA21148  | Mt. Pleasant Municipal Authority              |
| 8. PA26026  | New Brighton Sanitary Authority               |
| 9. PA26395  | Municipality of Penn Hills                    |
| 10. PA27464 | Pleasant Hills Authority                      |
| 11. PA25810 | Shade-Central City                            |
| 11. PA26212 | Washington-E.Washington Authority             |
| 13. PA01619 | Duquesne Light Philips                        |
| 14. PA04278 | Duquesne Slag Product Co.                     |
| 15. PA27715 | Mill Service, Inc. Yukon Plant                |
| 16. PA05037 | Pennsylvania Electric Company Homer City      |
| 17. PA27481 | Pennsylvania Electric Company Bruce Mansfield |
| 18. PA02305 | Robertshaw Fulton Company New Station         |
| 19. PA02437 | Shenango Incorporated Neville Coke & Iron     |
| 20. PA04464 | U. S. Steel Corporation Duquesne Works        |

We also plan to review the files of those minor municipal facilities which have been funded under Public Law 92-500. In these cases construction has been certified as completed by the Corps of Engineers.

Public Law 92-500 Minor Municipal Facilities

- 9274
1. PA38792 Adams Township
  2. PA45926 Allegheny Township
  3. PA46230 Carmichaels - Cumberland Joint Authority
  4. PA90140 Clymer Borough
  5. PA36609 Corway Municipal Authority
  6. PA23159 Cresent S. Heights
  7. PA23673 Gallitzin Borough
  8. PA42749 Jenner Area Joint Sewer Authority
  9. PA24481 Meyersdale
  10. PA21407 Boro Point Marion Sanitary Authority
  11. PA41441 Somerset Township - Wells CK Area
  12. PA22331 West Elizabeth
  13. PA23698 Vanport Township Municipal Authority
  14. PA92247 Unity Township Municipal Authority

At random, we selected the following minor facilities for file review during our visit.

Primary Industrial Minor Facilities

1. PA5673 ✓ Union Camp Co.
2. PA4308 ✓ Eidemiller Enterprises
3. PA2593 ✓ Teledyne-Scottdale
4. PA3000 ✓ H. H. Robertson
5. PA0761 ✓ Babcock & Wilcox - *Not in - delete*

Secondday Industrial Minor Facilities

1. PA00621 ✓ B & O Railroad
2. PA92002 ✓ Covenant Christian Church
3. PA92045 ✓ Stanton Enterprises
4. PA32182 ✓ Hills of Mingo Mobile Estates
5. PA33871 ✓ Mars Associates
6. PA90417 ✓ Albert F. Milauskas
7. PA34762 ✓ Ohio Township Elementary School
8. PA93114 ✓ Indiana Co. Housing Authority

Municipal Minor Facilities *Gene*

1. PA20656 ✓ Newell Municipal Authority
2. PA22365 ✓ Perryopolis Municipal Authority
3. PA24520 ✓ Marianna Boro
4. PA25500 ✓ Lilly Boro
5. PA27651 ✓ West Newton Boro
6. PA29700 ✓ New Eagle Boro *29696 - Plant 17*
7. PA37818 ✓ Saltsburg Boro
8. PA39489 ✓ Garrett Boro
9. PA90219 ✓ North Strabane Township
10. PA91081 ✓ Richland Township
11. PA92355 ✓ Bellevernon Municipal Authority
12. PA110469 ✓ Boro of Patton

*90212*

We look forward to our visit and our meeting with you and your staff.

Sincerely,

ORIGINAL SIGNED BY

J. DAVIS

Joseph Davis, Chief  
Pennsylvania Section  
Water Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

In Reply Refer To: 3WM52

Mr. James E. Erb  
Regional Water Quality Manager  
PA Dept. of Environmental Resources  
1012 Water Street  
Meadville, PA 16335

Dear Mr. Erb:

As you know, we will be visiting your office on March 22, 1983 and March 23, 1983. We plan to discuss with your staff the major facilities listed on the most recent QNCR. The following table is a listing of those facilities.

Major Facilities On QNCR

1. PA0026697	Butler Area STP Authority
2. PA0028223	City of Corry
3. PA0024571	Cranberry Twp. S & W Authority
4. PA0021792	Edinboro Borough Municipal Authority
5. PA0026832	Ellwood City Borough STP
6. PA0020257	Grove City Borough
7. PA0027511	New Castle Sanitary Authority
8. PA0026204	City of Oil City
9. PA0020346	Punxsutawney Municipal Sewage
10. PA0023213	Ridgway Municipal Authority
11. PA0003026	Abex Corporation
12. PA0006343	Armco Steel Corporation
13. PA0000183	General Electric Co. - Erie
14. PA0033367	Gunnison Brothers, Inc.
15. PA0001970	Koppers Company Inc. - Oil City

We also plan to review the files of those minor municipal facilities which have been funded under public law 92-500. In these cases construction has been certified as completed by the Corps of Engineers.

Public Law 92-500 Minor Municipal Facilities

- |    |           |                                      |
|----|-----------|--------------------------------------|
| 1. | PA0028941 | Evansburg Municipal Sanitary Auth.   |
| 2. | PA0046426 | Franklin Township Sanitary Authority |
| 3. | PA0028274 | New Wilmington                       |
| 4. | PA0046418 | Middleboro Municipal Authority       |
| 5. | PA0041831 | Northwest Crawford County            |
| 6. | PA0024511 | Redbank Valley Municipal Authority   |
| 7. | PA0029122 | Saxonburg Area Authority             |
| 8. | PA0036064 | Washington Township W & S.A.         |

At random we selected the following minor facilities for file review during our visit.

Primary Industrial Minor Facilities

- |    |           |                            |
|----|-----------|----------------------------|
| 1. | PA0001252 | Air Products & Chem        |
| 2. | PA0014494 | Reactive Metals & Alloys   |
| 3. | PA0003174 | Rockwell Intl - Truck Axle |
| 4. | PA0003646 | Gallaghers Laundromat      |

Secondary Industrial Minor Facilities

- |    |           |                            |
|----|-----------|----------------------------|
| 1. | PA0032778 | Architectual Div - Penndot |
| 2. | PA0100692 | Kevin L. Martin            |
| 3. | PA0031780 | Jack's Development Co.     |
| 4. | PA0035017 | R.K. Campground            |
| 5. | PA0101214 | Robison School             |
| 6. | PA0033821 | Pymatuning Labs            |

Municipal Minor Facilities

- |    |           |                                |
|----|-----------|--------------------------------|
| 1. | PA0020133 | Jenks Township                 |
| 2. | PA0023451 | Mount Jewett Boro              |
| 3. | PA0025739 | Port Allegheny                 |
| 4. | PA0028428 | Brockway Boro                  |
| 5. | PA0046418 | Middleboro Municipal Authority |
| 6. | PA0100960 | Bloomfield Township            |

Our file review will also include federal facilities which are in noncompliance. This noncompliance may be due to effluent violations or failure to submit discharge monitoring reports.

Federal Facilities In Noncompliance

- |              |                                    |
|--------------|------------------------------------|
| 1. PA0024970 | U.S. Corps of Eng. - Shenn         |
| 2. PA0025097 | U.S. Corps of Eng. - Woodcock      |
| 3. PA0025534 | U.S. Forest Service - Kiasutha     |
| 4. PA0025542 | U.S. Forest Service - Kinzua Beach |
| 5. PA0025551 | U.S. Forest Service Dewdrop Camp   |
| 6. PA0037117 | Blue Jay Center, USDA              |
| 7. PA0043834 | U.S. Army - COE - Shenango Beach   |

We look forward to our visit and our meeting with your staff.

Sincerely yours,

ORIGINAL SIGNED BY  
J. DAVIS

Joseph Davis, Chief  
Pennsylvania Section  
Water Permits Branch  
Water Management Division