From: Microsoft Outlook < MicrosoftExchange 329e71ec88ae4615bbc36ab6ce41109e@pa.gov>

To: Pudlick, Dan <c-dpudlick@pa.gov>

Sent: Mon 11/21/2016 9:22 AM

Subject: Relayed: Erie Coke Corporation, PA0100382, 11/10/2016, eFACTS ID 2534810

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

rwiler@eriecoke.com (rwiler@eriecoke.com)

Subject: Erie Coke Corporation, PA0100382, 11/10/2016, eFACTS ID 2534810

CW/IW/TECH/PA0100382

eFACTS ID 2534810



### NPDES COMPLIANCE INSPECTION REPORT

NPDES Permit No. Mo/Da	ay/Yr Entry T	ime Exit Time	Inspection Ty	ype eFAC	TS Inspection ID			
PA0100382 11/10/2	09:3	11:45	CEI		2534810			
Facility Name: Permittee Name:								
Erie Coke Corporation  Erie Coke Corporation								
Physical Location/Directions:		Permit Expiration Date:						
Foot of East Ave., Erie PA, 16512	October 31, 2017							
Municipality:	Permit Renewal Application Due:							
City of Erie	Erie	May 4, 2017			7			
Facility Type: Sewage Industrial Waste Industrial Stormwater Other:								
☐ Major ■ Minor								
Responsible Person:		Certified Operator Required: ☐ Yes ■ No						
Randall Wiler	Certified Operator:							
Title: Environmental Manager								
Permittee PO Box 6180,	Client ID:							
Address: Foot of East Avenue	Class-Subclass(es):							
Erie, Pennsylvania 16512	Circuit Rider: ☐ Yes ☐ No							
Business Phone: (814) 454-0177	Business Phone:							
Fax: (814) 456-9274		Fax:						
Email: rwiler@eriecoke.com	Email:							
24-Hour Emergency Contact Person / Phone: Randall Wiler / (814) 454-0177 (24-hrs/7-days per week operations)								
VIOLATIONS: ☐ Yes No ☐ Pending Sample Results								
A compliance evaluation inspection was conducted by Daniel Pudlick (ECDH) with Randal Wiler (Env. Manager), Bill Senyl (Wastewater Treatment/ Lab Supervisor), and Ron Romba (Plant Engineer)  Weather conditions at time of inspection were windy, cool, and partly cloudy with a temperature of 50 °F. There was approximately 0.25° of rain 72 hours prior to inspection.  A file review, DMR review, and walk-thru of the plant were conducted. Pictures are included with this report – no samples were taken.								
Person Interviewed:	Date:	Inspector:			Date:			
Randall Wiler	11/10/2016	Daniel Pudlick			11/10/2016			
Signature:	Phone No.: (814) 454-0177	Inspector Signate	ure:		Phone No.: (814) 451-6746			
Title: Environmental Manager	Title: Environmental Protection Specialist II							
Email: rwiler@eriecoke.com	Email: c-dpudlick@pa.gov							
This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and review of Department records.								



#### NPDES COMPLIANCE INSPECTION REPORT

#### Comments

#### Permit Verification:

- NPDES Permit expires 10/31/2017; permit renewal due 5/4/2017.
- Responsible official was verified at time of inspection.
- A Water Quality Management Permit is not required at this time.
- This facility discharges non-contact cooling water from Outfall 001 and boiler blowdown, & excess pump intake water from Outfall 002; both outfalls discharge Presque Isle Bay-Outer Harbor.

#### Operations and Maintenance:

- Operation certification is not required under Industrial Waste (IW) designation.
- No operational changes or chemical additives use reported.
- Settling tank utilized prior to outfall 002; not observed at time of inspection.
- Bulk chemicals stored on-site are reported to be stored in secondary containment or secure location.
- Best Management Practices (BMPs) in place to control and prevent storm water run-off from entering Lake Erie.
- An approximately 6-ft tall berm extends along the north boundary of this facility. Existing ground on- site is porous and non-impervious allowing accumulated precipitation to infiltrate directly. It was not apparent that any off-site stormwater runoff was occurring at time of inspection.
- BMPs outlined in Pollution Prevention and Contingency (PPC) Plan include that weekly inspection of the stormwater containment will be conducted to detect any potential failures.

#### NPDES Monitoring & Reporting:

- Effluent samples are taken directly from each outfall.
- Flows to each outfall are continuously measured by corresponding weirs with flow meters.
- Facility is required to sample 2/month grabs for pH and daily when discharging for temperature (immersion stabilization) at Outfall 001, as well as, 2/month grabs for pH, TSS, and oil & grease at Outfall 002.
- DMRs were reviewed back to January 2012 with one late submission for June 2016 and TSS exceedances reported in August 2012; submissions are timely and complete.
- Non-compliance Reporting Form is required with this permit; form was attached with DMR submission for TSS exceedance as required.
- Laboratory Accreditation Form is required with initial DMR of a renewed NPDES Permit and is only resubmitted if changes are made to laboratory or methods used to analyze parameters in the permit; form has not been submitted.

#### NPDES Part C Requirements:

- Changes in chemical additions or increase in usage rates must be submitted to Department 60 days prior to proposed used of chemical; see request format in Part C of NPDES Permit.
- Accurate records of usage of any approved chemical additive and blowdown discharge volumes must be maintained on the 'Chemical Additive Reporting Form' and kept on-site by the permittee; see Part C of NPDES Permit.

#### **Compliance History**

- Last inspection on 7/24/2012 was a follow-up inspection to an incident inspection on 5/9/2012 with violations noted in NOV dated 5/29/2012; facility responded to NOV and made corrections.

#### **Outfall Observations:**

- Outfall 001 is located northeast of facility; discharge flow was moderate and appeared clear, no staining or accumulation of solids were observed in the channel between the outfall and outer harbor.
- Outfall 002 is located northwest of facility discharging directly into outer harbor; discharge flow was moderate and appeared clear.
- No observations could be made of the outer harbor substrate due to murky water conditions.

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#### NPDES COMPLIANCE INSPECTION REPORT

#### Comments

#### Notes:

- Facility recently began maintaining bench sheets and on-site analysis records with change in personnel; bench sheets and on-site analysis records should be maintained for a minimum of 3-years and include collector name, collection date/time, collection location, analyst name, analysis date/time, analysis results, and record of pH meter & thermometer calibration.
- PPC Plan was last reviewed 3/1/2015; plan will be reviewed and personal information updated.
- An updated Laboratory Accreditation Form will be submitted with next DMR.

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## 3800-FM-BPNPSM0168B 9/2012 COMMONWEALTH OF PENNSTLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION DEPARTMENT OF ENVIRONMENTAL PROTECTION DEPARTMENT OF ENVIRONMENTAL PROTECTION pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF POINT AND NON-POINT SOURCE MANAGEMENT PROTECTION PROTECTI

### NPDES COMPLIANCE INSPECTION REPORT

Monitoring, Reporting and Recordkeeping (NPDES Permit Part A)							
On-site laboratory:	Registered	Accredited	☐ N/A	☐ Not Registered/Accredited			
On-site analyses:	<b>p</b> H	□ DO	☐ TRC	☐ All NPDES parameters ☐ None			
	Other(s): Ten	nperature					
DEP Lab Registration	/Accreditation #:	25-03996	Lab S	Supervisor:			
Comments:							
Contract Laboratory N	lame: Microbac	Laboratories, Inc	c.	DEP Lab Accreditation #: 25-0067			
Address & Phone: 1962 Wager Road, Erie, PA 16509 & 814-825-8533							
Parameters Analyzed: TSS and Oil & Grease							
Comments: Attach updated Laboratory Accreditation Form with first DMR of renewed permit; include on-site analysis.							
Sample Collection: Influent sampling location:							
Effluent sampling loca	tion: Outfall 00	1 & 002					
Location(s) adequate	for representativ	e samples:		■ Yes □ No			
Parameters analyzed,	sample frequen	cies and sample ty	pes meet p	ermit requirements: Yes   No			
Samples properly preserved during collection, storage and shipping:							
Sampler or sample temperature is recorded using NIST traceable thermometer:							
Comments: Effluent grab samples taken are immediately analyzed on-site for pH and temperature then stored in dorm-							
style refrigerator for contract lab to pick-up; sample storage temperatures should be maintained at 6°C or below.							
Composite samples: Being collected: ☐ Yes ☐ No Composites are: ☐ 8-hour ☐ 24-hour ☐ Other							
Samples are:	☐ Flow Pro	oportional	Time Pro	portional			
Sampler controlled by	: Influent	flow meter	Effluent f	low meter			
Minimum aliquot volume greater than 100 ml: ☐ Yes ☐ No							
Composite sampler temperature during inspection:							
Comments: N/A - or	nly grab sample	e required with pe	ermit.				
Sample records: Available for inspection: ■ Yes □ No Retained for at least three years: ■ Yes □ No							
Includes: Collector n		☐ No Collec	tion date/tir				
Analyst na	me: Yes	☐ No Analys	sis date/time	·			
· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	titation limits: 📕 Ye		Chain-of-Custody forms: ■ Yes □ No			
Comments: Contracted lab sample records only, only recent on-site records were available.							
Bench sheets: Data is consistent with data on the DMR: ■ Yes □ No □ N/A Month(s)/year checked: 9/2013 & 3/2016							
Comments: Data compared with contract lab sample records, on-site bench sheets were not available. Results below							
detection limits are not being properly reported; provided with DMR Overview & Summary via email.							
Field Testing: Comple	•						
Equipment is calibrate			DO:	Yes □ No TRC: □ Yes □ No □ N/A			
Other(s): ☐ Yes ■ No Thermometer							
Calibration records maintained: ■ Yes □ No							
Comments: Calibration records were available; three-point pH meter calibration occurs for pH analysis. Calibration							
should occur prior to sampling. Pocket pH meter thermometer should be compared with NIST traceable thermometer.							
DMR Submittal: DMRs are submitted as required: ■ Yes □ No eDMR User: ■ Yes □ No							
DMR Supplemental Reports are submitted as required: Ves No							
DMRs include all sam	ple results collec	ted and analyzed ι	using appro	ved methods: ■ Yes □ No			
	npliance Repor	ting & Suppleme	ntal Labor	atory Accreditation Forms are required with current			
permit.							

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### NPDES COMPLIANCE INSPECTION REPORT

#### **Photos**



Erie Coke Corporation PA0100382 11/10/2016 Outfall 001



Erie Coke Corporation PA0100382 11/10/2016 Outfall 002

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